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DISRUPTING THE SCHOOL-TO-PRISON PIPELINE: A PROJECT-BASED GRANT PROPOSAL THESIS TO PROVIDE COMMUNITY-BASED HEALTH EDUCATIONAL OPPORTUNITIES AS PREVENTION AND DIVERSION FROM THE JUVENILE JUSTICE SYSTEM FOR MIDDLE SCHOOL STUDENTS IN FULTON COUNTY, GEORGIA

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BY

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An abstract of A thesis submitted to the Faculty of the Rollins School of Public Health of Emory University in partial fulfillment of the requirements for the degree of Master of Public Health in the Executive MPH program 2017

Abstract

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BY Donielle LeSandra Bell

Adolescents who are justice-involved experience a significant disruption in a key transitional period of their lives. In addition to poor physical and mental health outcomes, justice-involved youth often suffer the long-term consequences of interruptions in their educational attainment, including health factors correlated to their socioeconomic position. Several factors may contribute to an adolescent's risk for justice involvement, including adverse childhood experiences, mental health and substance abuse. Addressing these factors themselves is key to both prevention of justice involvement as well as reducing recidivism. School related risk factors for justice involvement include exclusionary discipline and juvenile court referral. These disciplinary practices have been used, in some cases excessively, when other effective means of addressing behavior may be underutilized. Alternatives to exclusionary discipline may help reduce exposure to the juvenile justice system and correlated poor outcomes.

Recent attention has been given to both the disproportionality of suspensions, expulsions, and court referrals for students of color, and to the elevated rates of suspensions and expulsions in certain schools within Atlanta, Georgia metropolitan area school districts, including Fulton County Schools. Given the poor outcomes associated with justice-involved youth and the elevated risk for justice involvement among suspended and expelled students, the need for intervention is apparent.

This thesis project describes the development of a grant proposal to acquire funding for the support of development of interventions aimed at preventing and/or diverting at-risk middle school students in Fulton County Schools from involvement in disciplinary actions that include suspension, expulsion, or referral to the juvenile justice system, thus reducing the likelihood of correlated poor health outcomes. Such interventions would provide educational opportunities for at-risk students in the areas of individual and community health issues that potentially affect them and their communities. The proposal is in response to a request for proposals by the Fulton County Housing and Community Development Community Services Program (CSP) whose funding priorities include programs that address unhealthy behaviors in children and youth residents. The proposed program will be piloted at two middle schools within Fulton County with elevated rates of exclusionary discipline and/or referrals to the juvenile justice system.

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List of Acronyms

ACE	Adverse Childhood Experiences
CHINS	Children in Need of Services
СЛ	Criminal Justice Involvement
CSP	Community Services Program (Fulton County Housing and Community Development)
EBP	Evidence-Based Practices
ELA	English Language Arts Standards
FERPA	Family Educational Rights and Privacy Act
FCS	Fulton County Schools (Fulton County, Georgia)
F.R.E.S.H.	Fulton Roundtable Expanded Services Headquarters
GA DJJ	Georgia Department of Juvenile Justice
HSA	Holistic Student Assessment
IEP	Individual Education Plans
JJDPA	Juvenile Justice and Delinquency Prevention Act
MST	Multisystemic Therapy
OJJDP	Office of Juvenile Justice and Delinquency Prevention (U.S. Department of Justice)
OSS	Out-of-School Suspension
PBIS	Positive Behavioral Interventions and Supports
PII	Personally Identifiable Information
PPRA	Protection of Pupil Rights Amendment
RFP	Request for Proposal
RSPH	Rollins School of Public Health
SNAP	Supplemental Nutrition Assistance Program
STEAM	Science, Technology, Engineering, Arts, and Mathematics
TANF	Temporary Assistance for Needy Families

Chapter I: Introduction

Adolescence is a key stage of a person's development where behaviors and experiences can significantly impact their transition into adulthood, with major implications on their future health and well-being. The events in an adolescent's life can have lasting effects on their physical and mental health, financial stability, and occupational success. Adolescents who are justice-involved experience a significant disruption in this transitional period. In addition to poor physical and mental health outcomes, justice-involved youth often suffer the long-term consequences of interruptions in their educational attainment, including health factors correlated to their socioeconomic position (Zajac, Sheidow, & Davis, 2015). The impact of justice involvement on adolescents is a growing area of concern, and more attention is now being given to the implications of health in youth at risk for justice involvement, as well as the lasting health impacts on youth once involved in the justice system.

Several factors may contribute to an adolescent's risk for justice involvement, including childhood exposures to various forms of abuse or neglect, trauma, violence, or household mental illness or substance abuse. Adolescent mental health and substance abuse are also known contributors to risk. School related risk factors include low academic performance, suspension and expulsion. Such factors are overrepresented in adolescents that are justice-involved, suggesting that addressing these factors themselves is key to both prevention of justice involvement as well as reducing recidivism (M.T. Baglivio et al., 2014; Crosby, Day, Baroni, & Somers, 2015).

Along with a recent focus on efforts to reform juvenile justice policy, there has been new emphasis and opportunity for schools and other youth-oriented organizations to reexamine school disciplinary policies as they relate to student involvement in the justice system. Zero tolerance and other similar policies are being examined and modified in light of the extremely high rates of suspension, expulsion, and justice referral observed in many schools as a consequence of these policies. Given the poor outcomes associated with justice-involved youth and the elevated risk for justice involvement among suspended and expelled students, the need for intervention is apparent. This is especially true for students who are at a lower risk for serious offenses but remain at risk for justice involvement because of status offenses or other issues that may be more appropriately addressed within a community-based treatment program. Recent attention has been given to the disproportionality of suspensions, expulsions, and school referrals to the justice system for students of color. This is especially true in several school districts in the Atlanta, Georgia metropolitan area, including Fulton County Schools. Recent efforts to reform Georgia's juvenile justice system have included such programs which can divert offending youth from placement in detention facilities to evidence-based community prevention and intervention programs.

Problem Statement

There is a need for initiatives that will prevent and/or divert youth in metro Atlanta school systems facing school disciplinary action away from pathways into the criminal justice system, and thus reducing the likelihood of correlated poor health outcomes. Such initiatives align within the broader efforts that seek to address events and risk behaviors occurring in the lives of adolescents which impact their health later in life. The U.S. Department of Health and Human Services Second Decade initiative is one such effort to create a framework that can be applied on a community level in support of promoting the establishment of adolescent health behaviors and conditions and intervention for negative behaviors and conditions, with the goal of improving health outcomes later in the lives of this population. These initiatives also intersect with those within the Georgia Positive Behavioral Interventions and Supports (PBIS) framework, a preventive measure which incorporates feedback for positive student behavior within the context of classroom instruction, with the aim of reducing unnecessary discipline and promotion of productivity and a positive and safe school climate (O'Connell, Gudenrath, Davis, DeMuth, & Hill, 2013).

Purpose Statement

The purpose of this thesis project is to develop a grant proposal to acquire funding for the support of development of interventions aimed at preventing and/or diverting atrisk middle school students in Fulton County Schools from involvement in disciplinary actions that include suspension, expulsion, or referral to the juvenile justice system. Such interventions would provide educational opportunities for at-risk students in the areas of individual and community health issues that potentially affect them and their communities. Those developing the proposed intervention program will explore health issues contributing toward behavioral problems in school as well as health implications for persons involved in the criminal justice system. They will also seek to address the disproportionate number of suspensions, expulsions, and/or court referrals for students of color, and associated health disparities.

Objectives for Proposed Program

The proposed program is in response to a request for proposals by the Fulton County Housing and Community Development Community Services Program (CSP) that would serve as the funding agency. There are two main objectives of the program:

- To match at-risk students with mentors and opportunities for redirection through education/empowerment in coordination with Tier 2 (Needs-Based Learning) and Tier 3 (Student Support Team Learning) of the Georgia Positive Behavioral Interventions and Supports (PBIS) framework.
- 2. To reduce the rate of suspensions and other forms of exclusionary discipline in schools by providing disciplinary alternatives that incorporate project-based learning or service learning within community-based organizations.

Proposed Program Description

The program proposed for this grant opportunity will be piloted at two middle schools within Fulton County with elevated rates of exclusionary discipline (suspensions and expulsions) and/or referrals to the juvenile justice system. Criteria for student eligibility for the proposed program will be developed, and the program would be offered as an alternative to suspension, expulsion or court referral. Service learning and projectbased curriculum will also be developed with an emphasis on skill development in STEAM (science, technology, engineering, arts, and math) disciplines. Following assessments made by educators and community mentors, and informed by student participants, projects will be tailored to address issues immediately relevant to its participants and will include community and individual health, social determinants of health, and advocacy opportunities to address these issues. The proposed program will include development of specific training for educators and community mentors for working with at-risk students. Protection of human subjects in the program will also be described. Once developed, the proposal will be reviewed by five individuals, with knowledge of disciplinary programs in Georgia Public School systems, Georgia Department of Juvenile Justice, and/or the Fulton County CSP, against the proposal criteria detailed in the funding announcement. Revisions of the proposal will be detailed and incorporated based on reviewer feedback, and the proposal will then be finalized.

Significance

There are several reasons why it is important to prevent youth from being involved in the justice system when possible, with the associations between justice involvement and poor health outcomes as an area of notable significance. Health implications for those in the system include elevated risk for infectious disease, chronic disease and mental health issues, and the implications continue in the complexities of factors within related socioeconomic determinants of health. As policy evolves in the area of juvenile justice, new opportunities for intervention arise and strategies for reducing the number of justice involved youth can be implemented. School policies and programs can provide key access for intervention at a time in the life course when a significant impact can be made on their current and future health outcomes. School based interventions, or community-based interventions that are in collaboration with schools, could also serve as an effective means of reducing issues that distract from the primary focus of schools, which is the education of the entire student body. This, and the potential reduction of justice-involved youth, can also have a positive impact on the community. Schools in Fulton County, GA could benefit from such programs as they may reduce the current rates of students facing exclusionary discipline and juvenile

justice system referrals, redirecting students back toward opportunities for education. Because of the disproportionate number of African American students who receive exclusionary discipline and justice referrals in Fulton County schools, the interventions could also address disparities in these rates, and in the rates of associated health issues. The lessons learned in a pilot program in Fulton County have the potential for broader application in other schools in Fulton County and other Atlanta-area school systems. The success of any such program will require adequate community and financial support, and the funding opportunity afforded by Fulton County Department of Housing and Community Development via the Community Services Program grant would be an excellent fit in both areas.

Definition of Terms

<u>Adolescent/Juvenile/Youth</u>: These terms are used in this thesis interchangeably, unless otherwise noted, to describe children between ten and seventeen years of age. <u>Exclusionary discipline</u>: Disciplinary action, such as in-school suspension (ISS), out-of-school suspension (OSS) or expulsion, which removes the student from the usual classroom setting.

<u>Status offense</u>: An action that is against the law only due to a person's status as a minor; these actions would not be considered illegal if committed by a person over the age of majority in their jurisdiction.

<u>Delinquent/delinquency</u>: A person who has committed a crime, or the state of having committed a crime. For juveniles, delinquency is often defined as any criminal activity regardless of age, distinguished from status offenses which are age-dependent. The term delinquency in this thesis, unless otherwise noted, includes both criminal and status offense violations.

<u>Justice-involved, or criminal justice-involved (CJI)</u>: A person who is currently or previously involved with the criminal justice system, including those awaiting trial, on probation, under home confinement, incarcerated, under supervision or on parole. <u>Diversion</u>: A program that enables a person to participate in rehabilitation and/or restitution as an alternative to prosecution for violations of the law. <u>Individual Education Program (IEP)</u>: A written document of the special education service plan developed for a student with an identified disability, with details of specialized instruction and services to be used according to the student's needs. <u>Section 504</u>: Refers to Section 504 of the Rehabilitation Act of 1973 which guarantees certain rights and accommodations to people with disabilities. It includes a prohibition of denial of access to public school education and programs due to a student's disability.

Chapter II: Review of Literature

Introduction

There are opportunities to reduce the risk of adolescent criminal justice involvement and its subsequent impact on the health of youth and young adults who receive their secondary education in the Fulton County Public School system in Fulton County, Georgia. One key to this opportunity is the availability of school and community-based programs that address risk factors for involvement and redirect students from the pathways through the juvenile justice system whenever possible, as well as the funding needed to support such programs. The following review examines the literature describing characteristics of adolescent populations in the United States, and the link between health outcomes and adolescent involvement in the justice system. Contributing factors, including those involving school disciplinary policy, will also be discussed. This review of the literature will detail recent juvenile justice reform in the United States, with specific focus on recent reform in the state of Georgia. Description of prevention and intervention efforts and outcomes directed at reducing youth justice involvement will be examined, and the review will conclude with a discussion of funding opportunities for community-based programs within current reform efforts, with particular focus on funding specifically available for programs within Fulton County.

Adolescence

Demographics

The World Health Organization defines adolescence as a period between childhood and adulthood, ages 10-19 (World Health Organization, 2017). In the United States, adolescents are legally defined as minors with the age upper limit defined according to statues in individual states. In the state of Georgia, as with most other states, the age of majority is 18, meaning that persons 17 and under are legally classified as children (Georgia Department of Juvenile Justice, 2017). The U.S. population of children ages 10-17 is currently estimated to be over 33 million (33,670,000) and in Georgia, over 1 million (1,062,000), or about 10.5% of the total state population in 2016 (U.S. Census Bureau, 2016).

Development

Adolescence is a key period of human development with unique opportunities and challenges that can impact the successful transition to adulthood and later well-being (American Psychological Association, 2002). Adolescence is also a key period of socialcognitive and affective development. Significant structural development of the brain in regions active in social cognition occur at this stage, with implications on developing emotional perspective and tendencies towards higher-risk behavior (Choudhury, Blakemore, & Charman, 2006; Crone & Dahl, 2012). Levels of maturity in judgement varies, and may decline during mid-adolescence before increasing again in early adulthood (American Psychological Association, 2002). Development of emotional intelligence also occurs at this stage, along with the development of sense of identity in relation to others and capabilities of coping with stress and managing personal emotions (McNeely & Blanchard, 2010).

Successful interventions targeting positive outcomes in adulthood must consider such factors. Knowledge of these occurrences within this developmental stage can inform preventive and interventive measures geared toward positive outcomes. Cognitive performance may improve if youth are given learning opportunities that accommodate several types of abilities including analytical, practical, and creative abilities (American Psychological Association, 2002). Moral and ethical development occur within the context of adolescent cognitive and emotional development, and opportunities exist for development of values and ethical behavior during this period. These can be promoted in opportunities for adolescents such as community volunteerism, which has been linked to long term outcomes such as a reduced crime involvement in adulthood (American Psychological Association, 2002; Ranapurwala, Casteel, & Peek-Asa, 2016). Sensitivity to social context, which can significantly affect adolescent decision-making, should be considered in developing and executing programs addressing adolescent criminal and health behavior (Kilford, Garrett, & Blakemore, 2016)

Adolescent social development occurs within a context that includes relationships with peers as well as within families, school, work, and community. Within families, parental/teen conflict is normal as adolescents become more independent and relationship dynamics shift (Steinberg & Morris, 2001). There are often shifts in peer relationship focus, e.g. from group to dyad (friendships and/or dating relationships), and/or from same sex to mixed gender (American Psychological Association, 2002) Lack of social skills may lead to rejection by peers, which can increase risk of disruptive behavior and delinquency. Alternatively, such rejection may lead to issues that do not present themselves in an obvious manner but still warrant intervention (American Psychological Association, 2002). Peer relationships are also among the most influential toward decision making and behavior. This is especially true in the earlier stages of adolescence, where cognitive control and self-regulation are not yet developed to a capacity for resistance to peer influence (Albert, Chein, & Steinberg, 2013). Peer influence is believed to be a key contributor to substance abuse, crime, unprotected sexual activity, and other high-risk behavior among adolescents (Albert et al., 2013; Tomé, de Matos, Simões, Camacho, & AlvesDiniz, 2012). However, not all attributes resulting from these relationships are negative. Peers, mentors, and family members can also provide a protective influence against high-risk behavior (Padilla-Walker & Bean, 2009).

Most adolescents still need, and in some contexts, desire, guidance from trusted adult figures throughout their adolescent development. Adults can provide support and facilitate interventions to both reduce the adolescents' natural tendency toward risk and to direct them towards opportunities for developing resilience and prosocial behavior (American Psychological Association, 2002; Do, Guassi Moreira, & Telzer, 2016). Adults who are well positioned to do this will need to commit to an investment of time spent with adolescents to develop emotional bonds and establishment of trust while demonstrating that the perspectives of adolescents are valued (Hamburg, 1997).

It is important to consider the role of other factors on adolescent development and behavior. Studies that have focused primarily on adolescents who are white and of a middle socioeconomic background may not reflect certain factors affecting other ethnic, racial, or socioeconomic groups. Ethnic or racial identification may influence how teens relate to peers, especially if that identification is within a minority group (American Psychological Association, 2002). Determinants of behavior and outcomes, such as both negative and positive peer and family influence, may vary in some ways between different ethnic and racial groups (Padilla-Walker & Bean, 2009). Characteristics of the community in which adolescents live, such as socioeconomic level, availability of resources and services, neighborhood stability, and opportunities for mobility (moving out) can all have significant impact on adolescent development and behaviors. (American Psychological Association, 2002). Lower socioeconomic status has been identified as a significant determinant for negative health and other adverse outcomes in adolescent development, with poverty, violence, low community education and employment, and instability at home as risk factors (Devenish, Hooley, & Mellor, 2017; Quon & McGrath, 2015).

Adolescent behavior and future well-being

Behaviors, conditions, and experiences during adolescence can significantly impact the transition into adulthood and future wellness. Characteristics and behaviors of adolescents have been linked to various adult outcomes, including success in future occupations, financial well-being, and physical and mental health (Crews, Vetreno, Broadwater, & Robinson, 2016; Spengler et al., 2015). Health conditions and behaviors in adolescents affect youth both within and beyond this developmental stage. Education has been linked with long term health advantages, with strong associations between educational attainment and socioeconomic status (Ross & Wu, 1996). Students in poor physical health are limited in their ability to attain education, and success in school is correlated with adoption of health behaviors that are later reflected in adult health inequalities (Basch, 2011; Koivusilta, West, Saaristo, Nummi, & Rimpela, 2013). There are several negative outcomes in adulthood that have been linked to adolescent mental health. Exposure to chronic stress, as well as demonstrated anti-social behavior and defense mechanisms, are risk factors for adulthood aggression, depression and personality disorders (Choi et al., 2016; Strandholm, Kiviruusu, Karlsson, Miettunen, & Marttunen, 2016; Tielbeek et al., 2016). Adolescent substance abuse is one of many

common high-risk behaviors with future repercussions as it is a strong risk factor for lifelong substance use disorder (Jordan & Andersen, 2016). Alcohol exposure, especially binge drinking, impacts neurobiological development of the adult brain, and is a high risk factor for adult alcohol dependence (Crews et al., 2016). Sexual activity among adolescents present a risk of such life altering occurrences as unintended pregnancy and sexually transmitted infections (American Psychological Association, 2002). Delinquency, crime, and violent behavior in adolescents, especially when both in early adolescence and chronic in occurrence, poses a significant risk for problematic behavior patterns that persist in adulthood, often leading to criminal justice involvement (Evans, Simons, & Simons, 2016). Risk of delinquent and antisocial behavior that leads to criminal justice involvement can increase for adolescents that commit first-time offenses that result in exposure to more serious offenders (American Psychological Association, 2002; Utah Criminal Justice Center, 2010).

The Juvenile Justice System

Overview

The juvenile justice system in the United States can only be described generally as its structure and execution varies from state to state, and even from various communities within a state or jurisdiction. The U.S. Department of Justice Office of Juvenile Justice and Delinquency Prevention (OJJDP) describes a general process illustrated in the case flow diagram in Figure 1.



Figure: *Generalized Case Flow for Juvenile Justice Systems in the United States* Source: (Office of Juvenile Justice and Delinquency Prevention, n.d.)

A juvenile who violates the law is usually referred into the system by law enforcement, but parents, victims, and schools also make such referrals. Depending on various factors, cases are either diverted from the system or advanced to further processing, with numerous possibilities depending on the offense and surrounding circumstances. Many cases are handled informally where cases are dismissed pending the agreement and fulfilment of a consent decree or informal disposition where the juvenile satisfies certain conditions in exchange for case dismissal. Conditions may include curfews, school attendance, restitution, drug counseling or other requirements within a specified timeframe (Office of Juvenile Justice and Delinquency Prevention, n.d.).

Formally prosecuted cases are handled depending on the level of offense, with some cases proceeding to criminal court and others remaining in the juvenile court system. Most States have legislation that specifies certain serious offenses (e.g. murder, voluntary manslaughter, aggravated child molestation, armed robbery, aggravated sexual battery) that are to be processed in criminal court, with many states specifying conditions of criminal prosecution depending on the age of the juvenile. In many States, including Georgia, legislation has granted prosecutors discretion for deciding through which system a particular case should processed (Georgia Department of Juvenile Justice, 2017). Cases processed in juvenile courts are adjudicated and juveniles are released if cases are dismissed, or detained while awaiting disposition if found delinquent. Disposition can involve probation, commitment to residential placement, or a combination of the two (e.g. probation with weekend confinement) with any of these scenarios often involving additional requirements such as drug counseling or community service. Some juveniles are referred to post-commitment aftercare where they are supervised by the juvenile court system after their release in a manner similar to parole in the criminal justice system (Office of Juvenile Justice and Delinquency Prevention, n.d.).

According to the most recent data available, nearly 35,000 youth in Georgia were served by the Georgia Department of Juvenile Justice (GA DJJ) in fiscal year 2013. Over 1,700 of those served resided in Fulton County. A summary of youth served by GA DJJ, stratified by offense category, age, sex, and race or ethnicity, is presented in Table 1. The number of youths served by GA DJJ has declined in recent years. Georgia delinquency rates have declined for youths 16 and under from 74 per 1000 youths in 2007 to 44 per 1000 youths in 2013. Status offense rates for youths age 17 and under

		Georgia		Fulton Cou	inty
		Number Served	Percent of Total Served	Number Served	Percent of Total Served
Total Number S	Served	34946		1758	
Category of Most Serious Offense*	Drugs Property Public Order Non-Violent Sex Traffic Violent Violent Sex Weapons Unknown Status Offenses	3077 9200 5490 270 1943 7523 1167 854 1789 6550	8% 24% 14% 1% 5% 20% 3% 2% 5% 17%	57 547 181 8 11 625 49 44 189 308	3% 27% 9% <1% 1% 31% 2% 2% 2% 9% 15%
Age*	<12** 13-15 <u>></u> 16 Male	3225 16938 15661 24319	9% 47% 44% 70%	66 937 818 1321	4% 51% 45% 75%
JUA	Female	10627	30%	437	25%
Race/ Ethnicity	Black Hispanic White Other	18788 1983 13434 741	54% 6% 38% 2%	1597 67 73 21	91% 4% 4% 1%

Table 1: Unique Youth Served by the Georgia Department of Juvenile Justice, 2013

*Irregularities in methodology for counting the number of unique youth served in a given population may have resulted in subcategory totals that are different than reported overall total. Percentages calculated are relative to totals for the category rather than reported overall total.

**Reporting for youths age 12 is ambiguous but assumed to be included in "under 12" category

Source: (Georgia Department of Juvenile Justice, 2013a, 2013b)

have declined from 21 per 1000 youths in 2007 to 14 per 1000 youths in 2013 (Juvenile Justice Geography, Policy, Practice, & Statistics, 2017). A status offense is defined by the OJJDP as "a noncriminal act that is considered a law violation only because of a youth's status as a minor" (Development Services Group Inc., 2015b). According to collaborators at the Juvenile Justice Geography, Policy, Practice & Statistics (2017), these violations "can thrust an adolescent into formal juvenile court actions for services and safety but

also where their liberty may be at-risk." As of 2016, the jurisdiction for status offenses is up to age 17 in Georgia. Status offenses include truancy, underage consumption of alcohol or tobacco, running away from home, violation of curfew, being out of their parent or guardian's ability to govern them, or any other violation which is not lawful due to the age of the one charged with the offense (Juvenile Justice Geography et al., 2017). Table 2 shows a range of classification labels applied to juveniles committing status offenses, which have been associated with a spectrum between two perspectives: the child welfare perspective which considers the juvenile as a victim, or the public safety perspective where the juvenile is considered as an offender.

Child Welfare Pe	erspective <		>Public Sa	afety Perspective
In need of aid, assistance or care	In need of services	In need of supervision	Unruly	Status offender
 Child in Need of Aid Child in Need of Care Child Requiring Assistance Families in Need of Assistance 	 Children in Need of Protection or Services Child in Need of Services (CHINS) Family in Need of Services (FINS) Family in Need of Court- Ordered Services Family With Service Needs (FWSN) Juvenile Alleged to Be in Need of Protection or Services 	 Child in Need of Supervision (CHINS) Person in Need of Supervision (PINS) 	 Incorrigible Undisciplined juvenile Unruly Wayward 	 Juvenile petty offender Delinquent youth Status offender
Source: (Juvenile	Justice Geography e	et al., 2017)		

Table 2: Spectrum of Legal Labels in Various State Statutes for Youth CommittingStatus Offenses

Legal terms describing juveniles that commit status offenses reflect these perspectives and fall within the spectrum according to designations made by each state's jurisdiction. As part of recent juvenile justice reform, Georgia's currently classifies juveniles adjudicated for a status offence as Children in Need of Services (CHINS) ("O.C.G.A. § 15-11-2," 2014). This classification was changed within juvenile justice reform legislation HB 242 enacted in 2014. Juveniles committing status offenses were previously classified as "unruly" ("O.C.G.A. § 15-11-2," 2010). The changes in classification were made with the intention of distancing those committing status offenses from detention and other processes in place for delinquency, and instead handling the cases with community-based services more suited to low-risk offenders (Widner, 2013). Delinquent children are defined as those committing an act designated as a crime according to laws in Georgia, other states, federal laws, or local ordinances, and that are not crimes only due to an offender's child status. Delinquency also includes violation of the terms of court-ordered supervision or failure to appear in court for a delinquent act ("O.C.G.A. § 15-11-2," 2014).

Justice involvement and future health outcomes

Research supports the assertion that adolescent criminal justice involvement (CJI) disrupts the path to adult well-being and health. Juvenile incarceration is considered to be a determinant of health, correlated with worse health outcomes and poor social functioning throughout adulthood (E. S. Barnert, Perry, & Morris, 2016). Longitudinal studies have suggested that there is an independent association between incarceration during adolescence and poor physical and mental health outcomes in adulthood, including increased risk of sexually transmitted infections, (Elizabeth S. Barnert et al.,

2017; Khan et al., 2013). Justice-involved adolescents experience varying degrees of disruption during a transitional period when educational attainment and establishment of a vocation usually occur, leading to missed opportunities to establish a socioeconomic position that will influence health during their life course (Zajac et al., 2015).

Juvenile justice system involvement is correlated with both violent and nonviolent future crime and subsequent incarceration (Petitclerc, Gatti, Vitaro, & Tremblay, 2013). Incarceration aggregates persons at higher risk for various conditions affecting health such as mental health issues, substance abuse, infectious and chronic diseases including asthma, hypertension, arthritis, cervical cancer, HIV and Hepatitis C (Binswanger, Krueger, & Steiner, 2009; Heron & Hoyert, 2009; Maruschak, 2006). Studies have also suggested that incarceration functions as an exposure that is independently correlated with various mental health conditions (Blanc, Lauwers, Telmon, & Rouge, 2001; Fazel & Danesh, 2002; Schnittker, Massoglia, & Uggen, 2012; Wilper et al., 2009). Similar correlations exist with poor physical health due to limited access to necessary healthcare (Hatton, Kleffel, & Fisher, 2007; Magee, Hult, Turalba, & McMillan, 2005). Post release issues of health related difficulties as a result of barriers encountered while attempting to reintegrate with society, such as difficulties finding work, housing, access to healthcare, lack of emotional and social support (Brinkley-Rubinstein, 2013).

Outcomes of adolescent CJI can vary among demographics such as race and gender. Among justice-involved adolescents, there are ethnic and racial disparities in positive adult health outcomes, with African-American males faring the worst of all groups (Abram et al., 2017). Women who were justice involved adolescents are overrepresented in population of adults who are justice involved, but in much smaller proportion than men of similar background (Bright & Jonson-Reid, 2010). Negative outcomes that are more prevalent with or unique to justice-involved young women are related to pregnancy, parenting (including child maltreatment), and involvement in the child welfare system (Leve, Chamberlain, & Kim, 2015). While there are few studies specifically aimed at adolescents who are not justice-involved and who abstain from delinquent behavior, there is evidence that this group fares better as adults in areas such as lowered rate of substance abuse and delinquency in adulthood (Mercer et al., 2016).

Contributing factors to justice involvement

There are several predictive factors and known precursors to adolescent CJI. Many of these fall in to the category of adverse childhood experiences (ACEs), which refer to ten specific exposures identified as risk factors for adverse adult outcomes: emotional abuse, physical abuse, sexual abuse, emotional neglect, physical neglect, witnessed violent treatment towards mother, household substance abuse, household mental illness, parental separation or divorce, and having an incarcerated household member (M.T. Baglivio et al., 2014). Other factors contributing to risk of CJI include adolescent substance abuse, mental health issues such as major depressive disorder, exposure to violence, involvement in gangs, household and/or community poverty or low socioeconomic status, high-risk sexual behavior, low academic achievement, and exclusionary school discipline (i.e. suspension and expulsion) (Howell, 2009; K. C. Monahan, VanDerhei, Bechtold, & Cauffman, 2014; Newsome, Vaske, Gehring, & Boisvert, 2016; Shader, 2001; Voisin et al., 2015). For minority youth, racial discrimination as an adverse exposure has been indicated as an additional risk factor (Evans et al., 2016). Peer contagion is a commonly recognized contributor toward

adolescent CJI risk across several demographics, occurring both in natural peer relationships and in formalized group settings (Evans et al., 2016; Utah Criminal Justice Center, 2010). Group settings with youth with a mixture of levels of exposures to the justice system may be susceptible to "deviance training," where adolescents are at risk for acquiring new behaviors from deviant peers (Zajac et al., 2015). In adolescent populations within disadvantaged communities, the risk of deviant peer influence on an individual basis is increased to varying degree, largely depending on the quality of parental relationships and collective socialization for the youth at risk (Brody et al., 2001).

There is a linear relationship between cumulative risk of delinquency due to a combination of ACEs and other factors, and poor outcomes in both males and females (Fergusson & Woodward, 2000; Newsome et al., 2016). Males are more vulnerable to cumulative risk, with both genetic and environmental risk factors at play. Environmental factors may have more of a primary influence on males committing non-violent offenses. Females are more resilient to cumulative risk, but environmental factors are seen as a primary influence for those who do commit offenses (Newsome et al., 2016). Many risk factors are correlated among themselves. Those that experience childhood victimization are at higher risk for manifesting major depressive disorder as adolescents. Victimization and other adverse experiences in the home as children are a strong risk factor for running away or being thrown out of the home, and subsequent gang involvement, leading to justice system involvement (Howell, 2009).

There have also been characteristics and attributes of individuals, relationships, and systems that have been identified as protective factors against adolescent CJI. Most protective factors are defined in relationship with an opposing risk factor, where the protective factor is the opposite or absence of certain risk factors, or the protective factor somehow mitigates risk factors that exist. (Development Services Group Inc., 2015a; Newsome et al., 2016). Table 3 lists a number of individual, family, peer, school, and community level factors that either pose risk or offer protection from adolescent CJI.

While both dropout and truancy have been identified as risk factors for adolescent CJI and poor future outcomes, school attendance has been demonstrated to be protective factor (Rocque, Jennings, Piquero, Ozkan, & Farrington, 2016).

School attendance offers a greater protective benefit than other activities such as adolescent employment, which has been identified as a protective factor only if students remain in school in addition to their employment (K C Monahan, Steinberg, & Cauffman, 2013). Community involvement, such as volunteerism, is believed to be a potential protective factor. Adolescents who volunteer, either of their own volition or as required by an adult, may have less criminal involvement in adulthood than nonvolunteers, though this does not hold true for those who complete court-mandated volunteering (Ranapurwala et al., 2016).

Based on the factors contributing to risk, as well as those conferring protection, when developing effort for adolescent CJI prevention and reducing recidivism, it is beneficial to consider many of these risk factors as root causes to be addressed within a context. Scholars have noted that addressing social and environmental context is key in successfully approaching prevention efforts (Voisin et al., 2015).

	Risk Factors	Protective Factors
Individual	 Antisocial attitudes, beliefs Problem (antisocial) behavior Risk taking Physical violence Substance use 	 Intolerant attitude toward deviance Resilient personality Prosocial orientation Self-worth and sense of purpose Self-efficacy Conflict resolution/communication skills Involved in meaningful activities (e.g. tutoring/volunteering) Academic aspirations
Family	 Poor parent-child relationship Harsh or lax discipline Low parental involvement Low socioeconomic status/poverty Abusive parents 	 Parental monitoring Warm, supportive relationships with parents or other adults Parents' positive evaluation of peers Presence of a parent (during key times: before and after school, dinner, bedtime, and doing activities together) Fair and consistent discipline practices
Peer	 Weak social ties Antisocial, delinquent peers Gang membership 	 Peers who engage in prosocial behaviors Participation in prosocial activities Peers/friends with positive attitudes Peers with good grades Peers not involved in risky behaviors Peers with close relationships to parents
School	 Disconnectedness, disinterest Poor academic performance 	 Above average academic achievement/reading ability and mathematics skills High expectations for student academics, behavior, and responsibility Clear standards and rules for appropriate behavior Anti-violence and drug-free school policies Youth involvement in class activities and school policies, extracurricular activities, school clubs, and organizations Consistent acknowledgement or recognition for youths' good work Youths' feelings of school connectedness Attachment to teachers and other caring/supportive adults Use of proactive classroom-management strategies Parental support for school

 Table 3: Risk Factors and Protective Factors for Adolescent Criminal Justice Involvement

	Risk Factors	Protective Factors
•	 Neighborhood crime, drugs Neighborhood disorganization Lack of structured recreational activities Lack of available prosocial opportunities 	 Community safety Neighborhood cohesion Positive social norms School graduation rates/high expectations for youth Support and caring received from adults other than family members (mentors, coaches, neighbors, etc.) Meaningful ways for youths to participate in community activities Availability of prosocial activities

School discipline and juvenile justice

There are correlations between exclusionary school discipline and juvenile justice involvement. Exclusionary discipline includes out-of-school suspension and expulsion, often involving referral to police and/or juvenile courts. Discipline and enrollment data from the 2011-2012 school year indicate that nationally, 5.8 out of every one thousand students were subject to police or court referral, and that students of color or students with a disability are referred to police or courts at a disproportionate rate. Georgia ranked 40th of all states for overall referral rate, but has similar disproportionalities as observed on a national level for African American students and students with disabilities.(Zubak-Skees & Wieder, 2015). Table 4 presents national and state level data for Georgia from 2015 for students referred to law enforcement.

One of the consequences of exclusionary discipline is the removal of students so that they are no longer in a supervised setting, a situation that may put students at greater risk for adolescent CJI via gang involvement or other delinquent behavior (K. C. Monahan et al., 2014; Osgood, Wilson, O'Malley, Bachman, & Johnston, 1996). An

		Referral Rate (per 1000)	% Student Population	% of all Referred
U.S.	All Students	5.8	-	-
	Black	9.8	15.9	26.9
	Hispanic	5.9	23.5	23.9
	White	4.6	51.6	40.7
	Disabled	10.9	13.8	25.9
Georgia	All Students	3.2	-	-
	Black	4.4	37.2	51.3
	Hispanic	1.9	12.1	7.2
	White	2.6	43.9	35.8
	Disabled	7.0	11.5	24.9
Source: (Zul	bak-Skees & Wied	er, 2015)		

 Table 4: Rate per 1000 and Demographic Proportion of Public School Students

 Referred to Law Enforcement 2015

increase in exclusionary discipline is directly related to the adoption of zero tolerance policies. Such policies, which have been in place in schools since the 1990s, are based in a "philosophy or policy that mandates the application of predetermined consequences, most often severe and punitive in nature, that are intended to be applied regardless of the seriousness of behavior, mitigating circumstances, or situational context" (American Psychological Association Zero Tolerance Task Force, 2008). These policies are applied to students regardless of their risk level, with the goal of demonstrating consequences for categories of offenses that schools wish to prevent or eliminate the behavior for the sake of maintaining a safe learning environment. However, there are studies suggesting that zero tolerance policies fail to meet this objective, while increasing the number of students that are subject to exclusionary discipline along with its associated risks for CJI and other negative outcomes (Teske, 2011).

Disparities between race or ethnicity, sex, disability, and sexual orientation exist in suspension rates and police or court referrals. Most suspensions overall are for nonviolent violations such as truancy, inappropriate language, dress code violations, and classroom disruptions, as well as more subjective infractions such as talking back and showing disrespect (Losen, 2011). African Americans are suspended at a higher rate than white counterparts for first time offenses and non-violent offenses, especially when the offense is categorically subjective. There is an over-representation of African American students subject to exclusionary discipline in spite of the lack of evidence that the students are misbehaving at a higher rate than their white counterparts. (Bottiani, Bradshaw, & Mendelson, 2016; Bradshaw, Mitchell, O'Brennan, & Leaf, 2010; Losen, 2011). These occurrences disproportionately affects males, with African American males being subject to exclusionary discipline more than any other group (KewalRamani, Gilbertson, Fox, & Provasnik, 2007). Overrepresentation of minority students in exclusionary discipline holds true in public schools in the state of Georgia, including those in Fulton County. A 2015 study revealed that while 42% of students enrolled in Fulton County schools were African American, out of all students who were suspended during the school year, 81% of them were African American (Albright, 2016).

Non-heterosexual adolescents are also at a higher risk for suspension, expulsion, arrest and conviction, with non-heterosexual girls being at an even higher risk (Himmelstein & Bruckner, 2011) . Students who are suspended or expelled have a higher likelihood of being arrested within one month than those who are not subject to exclusionary discipline (K. C. Monahan et al., 2014). Students who may be deemed as "lower-risk" are at greater risk for arrest when they are suspended or expelled, often as a result of zero tolerance policies (Teske, 2011). Lower-risk students are characterized by a higher level commitment to school, fewer behavioral issues, and fewer friends who exhibit delinquent behavior (K. C. Monahan et al., 2014). These lower-risk youth are at

an increased risk of recidivism when disciplinary tactics applied to them are out of proportion to their offense (Teske, 2011).

Reform, Prevention, and Intervention

Juvenile justice reform

The juvenile justice system has evolved in structure and focus since the first juvenile court was established in Chicago in 1899. This first court separated detained or incarcerated juveniles from adults, and focused much less on punitive measures and more on the rehabilitation of juveniles. Juvenile courts held jurisdiction not only over youth committing crimes, but for those deemed neglected, abused, or those committing status offenses. The concept of a juvenile justice system was quickly adopted in other jurisdictions across the nation. The often informal nature of the proceedings in juvenile courts throughout the early and mid-20th century persisted until more formal protections and procedures were mandated in a series of U.S. Supreme Court decisions in the late 1960s and early 1970s (Institute of Medicine National Research Council, 2001).

In 1974, the Juvenile Justice and Delinquency Prevention Act (JJDPA) (Pub. L. No. 93-415, 42 U.S.C. § 5601 *et seq.*) was enacted by Congress, creating a partnership between the federal and state levels in their juvenile justice and delinquency prevention policies and programs, and establishing federal standards to "ensure a minimum level of safety and equitable treatment for youth who come into contact with the juvenile justice system" (Raphel, 2011). There are currently four core requirements in the Act:

• Deinstitutionalization of Status Offenders (DSO), an original requirement of the act which prohibits status offenders and non-offenders from being detained in juvenile detention facilities
- Sight and Sound Separation, an original requirement of the act which requires that juveniles detained or incarcerated in adult facilities be separated so that they are not in contact with adult inmates
- Adult Jail and Lock-Up Removal ("Jail Removal"), a requirement added in 1980 that permits juveniles to be incarcerated with adults only in very limited circumstances, and
- Disproportionate Minority Confinement/Contact (DMC), a provision added in 1988 and made a core requirement in 1992 in response to the overrepresentation of youth of color in the juvenile justice system. The core requirement was broadened from "Disproportionate Minority Confinement" to "Disproportionate Minority Contact" in 2002. (Primm et al., 2004).

The act was most recently reauthorized in 2002 but expired in 2007 (Raphel, 2011). Bipartisan efforts to reauthorized the act have been made, with the most recent effort currently active in Congress as HR 1809, the Juvenile Justice Reform Act of 2017 (Coalition for Juvenile Justice, 2017).

A shift in juvenile justice systems has occurred within the last three decades. In the late 1980s, with juvenile crime rates and severity thought to be on the rise, many held the opinion that juvenile justice policies were too lenient and not appropriate for the perceived unprecedented increase in violent crime committed by "super-predator" youth (Tanenhaus, 2013). In response, during the 1990s, several states passed more punitive juvenile justice policies with a primary focus on public safety and less emphasis on diversion and rehabilitation of juvenile offenders. Juvenile courts functioned similarly to criminal court, with some states adopting "blended sentencing" which allowed for a combination of juvenile and adult sentencing, (Meng, Segal, & Boden, 2013; Tanenhaus, 2013; Zaner, 1998). Mandatory minimum sentencing, lowered age for judicial waiver, and other punitively focused policies were implemented, and the power to make decisions on juvenile criminal cases, once held by judges and probation officers, was often transferred to prosecutors more focused on demonstrating toughness on crime than juvenile rehabilitation (Tanenhaus, 2013).

There have been several factors that precipitated a retreat from the primarily punitive approach to juvenile justice, prompting reform of juvenile justice systems in many jurisdictions. While a drastic drop in crime rates was observed mid-1990s, juvenile detention rates continued to increase well into the late-1990s. The rates remained at levels that were difficult to sustain, and many jurisdictions faced issues with financing the system due to increased costs of detaining and incarcerating juveniles, often in overcrowded facilities (Lachman & Neusteter, 2012; Skeem, Scott, & Mulvey, 2014). Evidence became apparent that most juvenile in detention were held for nonviolent offenses, including status offenses and other "low-risk" offenses, and that detaining these juveniles dramatically increased their risk for short term harm and long term life disruption (Mendel, 2014).

Three U.S. Supreme Court decisions have been pivotal for the direction of juvenile justice. In 2005, the death penalty for those under 18 was deemed 'cruel and unusual punishment' per the Eighth Amendment ("*Roper v Simmons*," 2005). The Court ruled in 2010 that juveniles could not be sentenced to life in prison without the possibility of parole for non-homicide crimes ("*Graham v Florida*," 2010). Subsequently, mandatory life sentences without parole for juveniles were also ruled in violation of the Eighth

Amendment (Program, 2012). Recently, the Court determined that the Miller v Alabama ruling must be applied retroactively ("*Montgomery v Louisiana*," 2016). Decisions in these key cases were made in part on the scientific basis for adolescents being treated differently than adults due to their yet to be complete cognitive and behavioral development. Adolescent tendencies toward risk taking and impulsivity, the importance of peer influence, and diminished self-control in emotionally charged situations are being demonstrated to have both a psychological and neurobiological basis, factors which must be considered in juvenile justice policy (Cohen & Casey, 2014).

Reform in the State of Georgia

As the shift occurred towards a more balanced approach to juvenile justice, many jurisdictions sought to reform their policies to reflect a commitment to public safety, while addressing juvenile delinquency and lesser offenses in the context of the characteristics of the developmental stage and various other circumstances of those in contact with the juvenile justice system. The process of reform in the state of Georgia reflects these considerations. in The Georgia State University Law Review (2014) summarizes the history and progression of recent legal reform in the state: In 2004, efforts to reform Georgia's Juvenile Code were initiated by the Honorable Robin Nash, who presided over the Council of Juvenile Court Judges. Between 2004 and 2008, a model code was developed by members of the Georgia State Bar's Young Lawyer's Division (YLD) and the newly formed statewide JUSTGeorgia coalition. The model was informed by "a review of academic literature, consultation with experts and practitioners throughout the country, and an extensive review of state statutes," and highlighted the relationship between the juvenile justice system and the "underlying social service systems that serve Georgia's children." Legislative efforts to enact the new code began in 2009, with relevant bills going through several iterations in both the GA House and Senate before 2012, when Governor Nathan Deal expanded a council previously commissioned to review criminal justice reform to include juvenile justice reform in its focus. The recommendations of the council, along with initiatives developed by the YLD and JUSTGeorgia coalition, were used for considerations in the formulating of HB 242, which was first introduced in February 2013 and after several amendments and advancement through the legislature, was signed by Gov. Deal on May 2, 2013. The act went into effect January 1, 2014 (Georgia State University Law Review, 2014).

The legislation modernizes Georgia's policies toward juveniles committing status offenses as well as more serious violations including violent crime. For status offenders, the code limits the charges for which juveniles can be detained, and it makes the CHINS designation explicit, providing for youth that would benefit from services to address their issues rather than court intervention. For those in contact with juvenile courts, more allowances for consideration of an offender's individual circumstance are now provided, informing decisions on how each case should be handled rather than applying a sweeping policy without these considerations (Georgia Department of Juvenile Justice, n.d.). Reduction of recidivism is another main objective of the reform, with a focus on risk assessment, community programs and other evidence-based programming, and aftercare and post-release services.

Economic considerations have driven some of the changes in direction within the juvenile justice system. Many jurisdictions have undergone justice reinvestment, where efforts have been made to reduce spending on correctional facilities, in large part by

reducing the number of detainees, while redirecting funds toward cost-effective alternatives that are beneficial for public safety (Lachman & Neusteter, 2012). Georgia's juvenile justice reform has included a shifting a portion of funds previously earmarked for operational costs for juvenile detention facilities, or redirecting funds previously intended for construction of new detention facilities, and redirecting them to initiatives aimed at lower-risk justice-involved youth such as school and community-based programs (Barr, 2016).

Prevention and intervention

With the shift in primary focus from punitive measures, juvenile justice reform has provided opportunities for implementation of initiatives targeting youth at risk for adolescent CJI, enabling the disruption of the "pipeline" at several points of intervention. Even before any contact is made with the juvenile justice system, early prevention programs aim to reduce risk factors for adolescent CJI and promote protective factors. Many of these programs serve pre-adolescent and younger adolescent populations, targeting those exhibiting antisocial behavior and other risk factors. Such programs have been proven to be both efficacious and cost-effective (Interagency Working Group on Youth Programs, 2017b; May, Osmond, & Billick, 2014). Intervention can take place at several places within the continuum (Table 5) as each stage offers opportunities for needs assessment and the provision of physical and mental health services, counseling, education, family-based interventions, and other evidence-based multi-systemic programs.

Stage of Processing	Description	Intervention opportunity				
Initial contact and referral	Often at discretion of law enforcement, can address offense informally, initiate diversion from formal processing if they meet certain criteria, or file a formal charge	Prevention/diversion programs				
Intake	Formal contact with justice system where next steps are addressed. Options can include dismissal, addressing a case informally, or proceeding with formal intervention via juvenile court system	Needs assessment, diversion				
Detention	Short term holding facility while juveniles are waiting for processing or disposition adjudication	Needs assessment, provision of services				
Judicial processing	Adjudication [hearing] and Disposition [analogous to sentencing])	Diversion, dismissal of formal charge upon completion of court- ordered disposition which may include restitution, restorative justice, substance abuse treatment, or other intervention often involving provision of services				
Probation supervision	Most common disposition, often with conditions	Condition that youth participate in restitution, restorative justice, community service, treatment, etc.; provision of services				
Secure correctional placement	Most severe disposition where youths are in long-term custody (incarcerated)	Provision of services, interventions aimed at reduction of recidivism				
Reentry	Occurs as youth transitions from custody back to the community	Provision of services, interventions aimed at reduction of recidivism				

Table 5: Intervention Opportunities Within Juvenile Justice Processing Continuum

Source: (Interagency Working Group on Youth Programs, 2017a)

Types of interventions

Over the past two decades, there have been several approaches to intervention at different points within the continuum, with varying degrees of effectiveness. Programs such as Scared Straight and juvenile boot camps aimed to deter juveniles from criminal behavior by exposing them to adult prisons and interaction with those who are incarcerated. The current consensus in the literature is that these types of programs do not prevent, and may even indirectly promote future delinquency (May et al., 2014; Petrosino, Turpin-Petrosino, Hollis-Peel, & Lavenberg, 2013). Restorative Justice (RJ) programs are shorter term interventions requiring juveniles to address victims of their delinquent acts, focusing on the behavior of the crime. This intervention has been shown to be most effective for young adolescent male first time offenders, but much less so for other groups, especially for those having previous justice involvement (May et al., 2014).

Increasingly common are interventions involving evidence-based practices (EBPs). These interventions have produced data from randomized, controlled trials and positive results from outcome evaluations, and have been vetted by both public and private organizations interests in interventions for adolescent CJI, such as the OJJDP or the University of Colorado-based Blueprints for Healthy Youth Development (Office of Juvenile Justice and Delinquency Prevention, 2017b; University of Colorado Center for the Study and Prevention of Violence, 2017). One such program is Multisystemic Therapy (MST). Often deemed as the "gold standard" of EBPs, MST addresses the needs of juveniles within their family, school, and community systems where problems can occur that put them more at risk for CJI (MST Services Inc., 2015). These programs also focus on involving youth in prosocial activity while promoting a change in their influential peer group. This intervention serves as an alternative that has been

demonstrated to be more effective than detention and incarceration in reducing delinquency recidivism rates (May et al., 2014). Costs for this intervention have been determined to be more cost effective than many alternatives (Osher, Quinn, Poirier, & Rutherford, 2003). Another successful program, the Adolescent Diversion Project, partners Michigan State University students with the Ingham County Circuit court to work with youths referred to the program in a "strengths-based, advocacy framework" that equips them in skill building within their family, school, work, and social arenas (National Institute of Justice, 2013; Smith, Wolf, Cantillon, Thomas, & Davison, 2004). The personalized approach for participating youths has been demonstrated to significantly reduce recidivism (National Institute of Justice, 2013).

The Georgia Department of Juvenile Justice has supported the adoption of several EBPs, including MST, Aggression Replacement Training, Functional Family Therapy, and others, by funding these programs from both state and federal funds via the Juvenile Reinvestment Grant program for county-level jurisdictions within the state. Many counties, including Fulton County, have adopted more than one EBP to address a wide range of factors that influence adolescent CJI and recidivism risks for youths within the county (Georgia Department of Juvenile Justice, 2014). Several juvenile court systems have implemented programs in line with current reform efforts. Fulton County Juvenile Court operates several programs that offer possible alternatives to progression through the formal juvenile court process. The Court's Community Restorative Boards provide a diversion opportunity for first-time, non-violent minor offenders who may have their cases dismissed and records sealed upon the completion of sanctions issued after discussion with the youth, their parents or guardians, and victims of their offenses.

Mediation may also be offered for some cases (Fulton County Juvenile Court, 2017). The Newton County Truancy Intervention Board provides similar opportunities for diversion from the formal court process while working with community groups and stakeholders to address root issues of truancy for students (Status Offense Reform Center, 2015).

There are several local community-based programs addressing juvenile justice issues. As a part of justice reform, Governor Nathan Deal commissioned the Healing Communities of Georgia, a network of state agencies, non-profit organizations, and local faith-based organizations focused on promoting pro-social behavior and providing mentoring and other support for the formerly incarcerated, including juveniles, upon their reentry into the community (Bluestein, 2014). Other non-profit initiatives focus on early prevention by targeting youth with adolescent CJI risk factors such as behavioral or academic issues, and providing them with opportunities for development in academics, athletics, civic engagement, and other areas. The Launch Expose Advise Direct (L.E.A.D.) program is an example that operates in the Atlanta, Georgia metro area (University of Colorado Center for the Study and Prevention of Violence, 2017).

There are also prevention initiatives addressing school discipline, reducing exclusionary discipline and juvenile court referrals. One of these initiatives is Positive Behavioral Interventions and Supports (PBIS). PBIS, a "systematic framework that is designed to enhance academic and social-behavior outcomes by implementing a continuum of evidence-based interventions," has been adopted by the Georgia Department of Education and has been implemented in several counties with districtwide implementation in some school systems (O'Connell et al., 2013). Interventions and academic and behavioral supports are applied in a four-tier structure, with provisions for progressive levels of support for students displaying a need. These interventions and supports would include provisions made for students at risk for adolescent CJI and in need of early intervention, as well as students returning from juvenile justice youth development campuses or detention centers, many of whom have disabilities and mental health concerns (Losen, 2011; O'Connell et al., 2013; Teske, 2011). PBIS emphasizes the acknowledgement of appropriate behavior without waiting for inappropriate behavior to incur disciplinary action, and is designed to provide a "predictable, consistent, fair, and equitable disciplinary system" instead of inconsistent application of policy that often leads to exclusionary discipline (O'Connell et al., 2013).

The School Referral Reduction Protocol is another program implemented in Clayton County, GA. The program, which involves partnerships between the Georgia Department of Juvenile Justice, Clayton County Juvenile Court Judge Steve Teske, Clayton County Public Schools, and local police departments, provides opportunities for addressing first and second time low-level offenses outside of the court system. The program has reduced school arrests without decreasing school safety (Georgia Department of Juvenile Justice, 2012). Other changes that have been suggested for school disciplinary protocol include the implementation of uniform and explicit disciplinary policies that replace subjective, ad hoc enforcement, requirement of more transparency in racial demographics of disciplined students, and collaboration with parents and students in a pre-hearing conference prior to pursuit of suspension, expulsion, or court referral. The collaboration would involve seeking alternatives to discipline that would separate students from the classroom environment (Georgia Legal Services Program, 2012).

There are several considerations to make in the design of new interventions and the implementation of new and existing interventions for adolescent CJI prevention and outcomes. Emphasis has been placed on evaluation of demonstrated or potential effectiveness of intervention programs, with some earning the EBP distinction, and both government juvenile justice jurisdictions and private foundations that provide funding have selected programs based on this distinction. However, there are concerns about the uniformity applied in rating programs among organizations and government departments that provide the designations (Gately, 2014). Programs that are smaller in scope, newer, or more grassroots in origin may show promising results, but some have raised concerns about these programs being eliminated from consideration because they lack the EBP distinction due to limitations that make randomized and controlled studies of the program impractical (Gately, 2014). Additionally, challenges exist with the translation of research into practice for determining program effectiveness (Lipsey, Howell, Kelly, Chapman, & Carver, 2010).

Additional considerations include those for certain groups of the adolescent population that commonly come into contact with the juvenile justice system. Dual status or "crossover" youth are those who are concurrently involved in the child welfare and juvenile justice systems. Interventions that include dual status youth must be implemented with attention to additional risks of negative outcomes related to exposures to both systems (M. T. Baglivio et al., 2016). Concerns have been raised about "widening the net" of the justice system, or including youth in the system as a means to provide needed services, especially in cases of youth with special needs and mental health issues. An overly broad inclusion of children in need of services risks exposure of low- or even no-risk youth to the justice system, putting them at higher risk for offending in the future. Youth who may be more appropriately diverted out of the system also reduce the resources available for moderate-risk youth, who may in turn have more of a likelihood of placement in secure detention (Juvenile Justice Information Exchange, 2017a; Models for Change, 2010).

Funding and support

Federal funding via the JJDPA provides support of state-level compliance to the four core requirements of the act. In Georgia, advisory agencies administer federal funding, received as Title II formula grants or as the Juvenile Accountability Block Grant. These grants have provided financial support to local programs that employ evidence-based and community-oriented programs (Coalition for Juvenile Justice, n.d.). Two grant programs were enacted in 2014 as a part of Georgia's juvenile justice overhaul. The Criminal Justice Coordinating Council administers the Juvenile Justice Incentive Grant Program, a recent initiative providing support for community-based programs that provide needed services for youths committed to the juvenile justice system who may otherwise be held in short-term detention facilities. The Governor's Office of Children and Families grant program administers the Juvenile Reinvestment Grant which focuses on EBPs aimed at the prevention of recidivism for those who have been formally charged (Criminal Justice Coordinating Council, 2017; University of Georgia Carl Vinson Institute of Government, 2014). With the JJDPA reauthorization in limbo, along with other political factors, the future of federal support may be in question. As of 2015, federal funding supporting juvenile justice initiatives via Title II formula grants for state jurisdictions have been on the decline, prompting the concern of some that states may reduce their efforts to complying with JJDPA core requirements due to underfunding, loss of financial incentive and resources to carry out the requirements, possibly leading to a return to higher detention and incarceration rates due to lack of resources for programs (Gately, 2015).

Federal funding has been a major source, but other support is also available from private foundations who work with state government departments of juvenile justice, local juvenile justice jurisdictions, and many nonprofit organizations with youth and adolescent CJI programs. One example, the Annie E. Casey Foundation, provides funding for technical assistance and training for sites adopting their Juvenile Detention Alternatives Initiative. The initiative has been adopted by over 300 counties nationwide and has proven to be an effective model for reducing juvenile detention rates over a 25 year period (The Annie E. Casey Foundation, 2017). Among many other foundations funding reform and community-based programing are the John D. and Catherine T. MacArthur Foundation, the Eckerd Family Foundation, and the J.M Kaplan Fund (J.M. Kapland Fund, 2017; MacArthur Foundation, 2017; Office of Juvenile Justice and Delinquency Prevention, 2017a). In the Metro Atlanta area, local and community-based justice programs have been grant recipients of funding from organizations such as the Zeist Foundation, the Catholic Campaign for Human Development, and various private philanthropic initiatives (Greear, 2011; The Zeist Foundation, 2017). Programs focused specifically on juvenile justice, however, have been funded both by federal grants

specific for juvenile justice initiatives and other public and private sources that support programs in youth education, health, violence reduction, community building, and other areas that intersect issues related to juvenile justice (Juvenile Justice Information Exchange, 2017b).

In Fulton County, Georgia, a wide range of nonprofit organizations have received funding from grants made available through county budget allocations. Until 2015, the Fulton County Housing and Human Services Department has administered both the Fulton Roundtable Expanded Services Headquarters (F.R.E.S.H.) Grant and the Human Services Grant to community-based organizations providing programming and services that align with the department's mission and "bridge the gap" in direct government services to its constituents (Church, 2012; Fulton County Government, 2011). The grants have been awarded to programs meeting needs specific to each of the County's six districts. Services for at-risk teens and prevention programs addressing truancy, school suspension, and drop-out rates are listed as targeted needs for at least 4 of the six districts in the request for proposals for the grants (Fulton County Government, 2015). Modifications to the grant programs were made after internal audits highlighted the need for a more extensive tracking process for administered funds (Fulton County Office of Internal Audit, 2015). In 2016, the program was consolidated and rebranded as the Fulton County Community Services Program (CSP). The County has continued to award eligible service providers that align with the Fulton County Government strategic priority areas, including health, safety, self-sufficiency, economic opportunity, cultural and recreational enrichment, and trust in county government (Fulton County Department of Housing and Community Development, 2017b). The 2016 and 2017 CSP awarded grants to applicants providing services that specifically address children and youth services. Some of the awarded programs under the F.R.E.S.H and Human Services grants have specifically targeted juvenile delinquency, while more recent CSP funding has been awarded to programs addressing various adolescent CJI risk factors (Fulton County Department of Housing and Community Development, 2017a). Examples of grantees include:

- Urban League of Greater Atlanta Project Ready, a college readiness and life skills program offering individualized support in academics and other areas, mentorship, and partnership among students, parents, teachers, administrators, and post-secondary educational institutions (Urban League of Greater Atlanta, 2016)
- Big Brothers/big sisters of Metro Atlanta One-to-One Mentor for Children Facing Adversity in Fulton County, a program focusing in part on youth atrisk for dropping out, substance abuse, or adolescent CJI (Big Brothers Big Sisters of Metro Atlanta, 2017)
- Communities in Schools of Atlanta Dropout Prevention Program providing wraparound services which link at-risk students with community based services that support their success in school, home and community (Communities in Schools of Atlanta, 2017)
- The Truancy Intervention Project, which provides resources and intervention services for students with chronic absenteeism resulting in adolescent CJI or school referral to the program (Skola & Williamson, 2012; Truancy Intervention Project Georgia, 2013).

Conclusion

There are many Fulton County School students who are at a higher risk for adolescent CJI via exclusionary discipline, and thus at higher risk for poor health outcomes and other negative factors affecting their well-being during their life course. Because of this risk, there is need for initiatives that target these students for prevention and/or diversion from justice involvement by providing alternatives to exclusionary discipline while addressing other factors that may contribute to problem behavior. This review of the literature reveals that the potential for such initiatives is well supported. The substantial knowledge found in the literature concerning adolescent development support that this life stage presents key opportunities for intervention, especially for younger adolescents attending middle-school. The review of the history and current trajectory of the juvenile justice system, specifically in Georgia, demonstrates a developing climate where such interventions are recognized as needed and increasingly supported.

The OJJDP has endorsed several community-based and school-based programs, and many of these programs have been funded by federal, state, and local grants, as well as grants made by private institutions. The proposed program is a school-based intervention in collaboration with community partners that seeks to prevent or divert students from justice involvement with methods and practices supported in the literature such as mentoring, prosocial activity, positive peer influence, and skill building within multiple areas of a student's life. The proposal seeks local funding from a grant made by Fulton County, Georgia in order to meet the needs of students residing within the County. The information gained while executing the program will be a valuable addition to the growing body of knowledge in the area of adolescent intervention for youth at risk for justice involvement, with potential for application in other communities.

Chapter III: Methodology

Funding Agencies that Address Proposal Topic

There are several funding agencies that work with community-based programs addressing children and youth-specific issues such as risk for juvenile justice involvement. These agencies are found both public and private sectors, both nationally and locally based. Private foundations such as the Annie E. Casey Foundation, the John D. and Catherine T. MacArthur Foundation, and the Eckerd Family Foundation have awarded funding for community-based programs operating within non-profit organizations across the country that work with youth and adolescent CJI prevention. Many foundations and organizations that award funding to similarly focused programs are based in the state of Georgia and fund programs in specific regions or counties within the state: the Malone Family Foundation, the Community Foundation for Greater Atlanta, the Zeist Foundation, and the Atlanta Catholic Campaign for Human Development, among others. National public funding agencies such as the Office of Juvenile Justice and Delinquency Prevention (OJJDP) and the Substance Abuse and Mental Health Services Administration (SAMHSA) award grants to states, territories, local governments and private organizations that operate juvenile justice related programs. State level funding for evidence-based programing is available in Georgia's Criminal Justice Coordinating Council via the Juvenile Justice Incentive Grant program. In addition to Fulton County, DeKalb County and Cobb County (in conjunction with the Cobb Community Foundation) award funding to non-profit organizations that deliver services to their respective county residents, including youth development services that address issues such as risk for delinquency.

Description of Request for Proposals

The proposal for the PIVOT Program is in response to the Fulton County (Georgia) Department of Housing and Community Development Office of Grants and Community Partnerships Request for Proposals (RFP) for the 2017 Community Services Program (CSP). A copy of the full RFP for the 2017 CSP can be found in Appendix A. This is the second year that the CSP request for proposals have been released. In 2016, the inaugural CSP was approved by the Fulton County Board of Commissioners to replace the former Fulton Roundtable Expanded Services Headquarters (F.R.E.S.H.) grant program and the Human Services grant program, both of which concluded December 31, 2015. Previously, the 2016 RFP and 2017 RFP for the CSP were accessible on the Fulton County Office of Grants and Community Partnerships website, but access to the 2017 RFP has since been limited to agencies who are registered in the Fulton County WebGrants online system. A listing of CSP award recipients for both years remains available on the Fulton County Housing and Community Development website (Fulton County Department of Housing and Community Development, 2017a).

Funding through the CSP program is awarded to non-profit agencies that partner with Fulton County Housing and Development to coordinate and deliver social service programs to Fulton County residents, pursuant to the Fulton County Strategic Plan which encompasses six priority areas that address the following for Fulton County residents: health; safety; self-sufficiency; access to economic opportunities; cultural and recreational enrichment; and trust in an efficient, effective and fiscally sound government (Fulton County Office of County Manager, 2016). There are five specific service categories addressed by the CSP: Children and Youth Services, Disabilities, Economic Stability/Poverty, Homelessness, and Senior Services. Within the Children and Youth Services category, one of the CSP funding priorities is for programs that address contributing factors to unhealthy behaviors in children and youth, including but not limited to truancy, juvenile crimes, youth violence, and student mobility. Performance measures in this category include the number of youth involved in a program that demonstrate a decrease or elimination of delinquent behaviors such as truancy, in-school suspension, or out-of-school suspension.

The Community Services Program's objectives and funding priorities, along with its local focus, align with the aims of the proposed PIVOT program. The PIVOT program is a hypothetical program conceptualized as means to address the need to prevent or divert Fulton County middle school students from disciplinary pathways that place them at elevated risk for juvenile justice involvement and its correlated poor outcomes. The program addresses youth at risk for juvenile justice involvement in schools experiencing high rates of suspension. The program aims to address and redirect problematic student behavior in these schools, while reducing the number of suspensions and other forms of exclusionary discipline that increase the risk of juvenile justice exposure and the poor outcomes resulting in such exposure.

The PIVOT Program responds to the following CSP review criteria:

• Demonstration that the proposing agency has sufficient knowledge, skills and abilities to provide services. The proposal responds to all inquiries outlined in the RFP with extensive detail about the need addressed by the proposed program, characteristics of the schools and surrounding communities to be served, and details about program activities and services with a focus on collaborative partnerships and available resources that will enable the success of the program.

- *Program is results driven*. The proposal includes specific performance measures to track results of the program.
- Program is evidence-based. The proposal refers to and describes evidence-based practices that will be used in the PIVOT program along with supporting data.
- *Program is innovative.* The proposal describes the innovation of the program in its creative approach to addressing the described need in ways that have not been realized by other programs or policies for the target population.
- *Program is collaborative*. The proposal includes a description of several potential collaborating agencies that will partner in program activities.
- *Program is systemic in approach.* The proposal describes the program's aims in addressing root causes for issues affecting its target population while providing alternatives to current disciplinary protocols and providing an opportunity to evaluate disciplinary and academic policies.
- *Program addresses one of the five CSP service categories*. The proposed program addresses the Children and Youth Services CSP service category.
- Addresses a minimum of one funding priority within the primary service category addressed. The proposal addresses the funding priority concerning contributing factors to unhealthy behaviors in children and youth, which falls within the Children and Youth Services category.

• Able to report on a minimum of one County defined performance measure throughout contract period. The proposal states that, in addition to other performance measures determined within the program, the County-defined performance measure that will be reported is the number of youth involved with or at risk for involvement with the Juvenile Justice System who demonstrate decreased or no delinquent behaviors (i.e. truancy, in school suspension, out of school suspension, etc.).

Accordingly, the program is an ideal candidate for funding via the CSP to work in partnership with Fulton County in providing services to its residents.

Grant Review Process

Five individuals were selected to participate in the proposal review process. Reviewers were independent from the thesis committee and chosen on the basis of their expertise in areas addressed by the proposal, or their experience with the Community Services Program and Fulton County and other similar funding agencies. The following individuals provided a review of the grant proposal:

Margaret Cawood - *Deputy Commissioner, Division of Support Services, Georgia Department of Juvenile Justice.* Ms. Cawood has over 30 years of experience in the youth service field, including fifteen years with Georgia Department of Juvenile Justice. She currently works with health, behavioral health, programming, training, classification and transportation for Georgia's state run juvenile justice system. Her prior experience includes the implementation and supervision of child and adolescent community based services in both Tennessee and Georgia. In 2008, Ms. Cawood successfully lead the implementation of a SAMHSA System of Care Grant which enabled the development of an integrated system of services and supports for youth with mental health needs in the Northwest Georgia Region.

Kim Farr - *Manager of Institutional Giving, Year Up Greater Atlanta*. Ms. Farr holds a certification in grant writing and has extensive experience with fundraising and non-profit organizational development. Since 2014, she has worked first as the Development Manager and currently as the Manager of Institutional Giving at Year Up, a non-profit workforce development organization that serves low-income youth and young adults by offering skills training and internships, with wraparound services and supports.

Charles Few – *Middle School Teacher, Martin Luther King, Jr. Middle School, Atlanta Public Schools.* Dr. Few has over nine years of experience in working with middle and high school students in two metro Atlanta-area public school systems. He has processed discipline referrals for both general education and special education students as part of his administrative role as Dean of Students at Riverwood International Charter School (Fulton County Schools), and has worked in transition services with special education students to help them identify and select career choices and post-secondary pathways.

Monita Morton – *Curriculum Assistant Principal, Creekside High School, Fulton County Schools.* Ms. Morton has worked with students and parents in Fulton County Schools since 2005. Her experience includes her work as the Head Counselor at Langston Hughes High School, and as a Graduation Coach at Bear Creek Middle School where she maintained key roles in closing achievement gaps for both the general student body as the Advancement Via Individual Determination (AVID) program coordinator, and students with disabilities as the Section 504 coordinator. Among other duties, Ms. Morton has worked with PBIS and Student Support/Response to Intervention Teams (SST/RTI), developed Individual Education Plans (IEP) for students with special needs, and coordinated students and parents to resources and services.

Eve Rose - (*RISE*) Center Director of Administration, Rollins School of Public Health, Emory University. Ms. Rose is a research Director with 18 years of experience in proposal development, research project management, and budget development. Further, she recently served as Program Director for the Emory University-based site of a multisite juvenile justice grant focused on connecting youth under community supervision to behavioral health services in their communities.

Reviewers were contacted by email and given a summary of the PIVOT Program and the need addressed by the program, as well as a summary of the RFP. After agreeing to participate, the proposal narrative and evaluation form was electronically disseminated to reviewers, with accompanying instructions. A document was created highlighting specific information from the RFP that was pertinent to evaluation criteria for the proposal narrative. This document was included with the evaluation form. Reviewers were also provided access to an electronic copy of the full RFP. Reviewers were given approximately three weeks to complete their review and return the evaluation form electronically. Each reviewer conducted their evaluation independently and provided their responses individually.

The evaluation form (Appendix B) was adapted directly from evaluation criteria outlined in the Community Services Program RFP. The form included only criteria pertinent to the proposal narrative, excluding criteria for proposal budget, biographical information, and other information requested in the RFP but not contained in the narrative. Responses to the RPF were structured as sections of the proposal narrative: General Agency Information, Citizen Needs, Approach and Design, Program Performance Measures, Conclusion, and General Proposal Attributes. Specific criteria per section were detailed in the RFP, and sections were awarded points for how well the proposal met the criteria. Points were awarded on a scale of one to three, with three points indicating that criteria were fully met, two points for criteria adequately met, and one point for criteria addressed but not met. Descriptions for each level of criteria fulfilment were provided within the evaluation form as a guide for reviewers. These descriptions were directly adapted from the evaluation criteria in the full RFP, with no modifications for all applicable sections. The maximum number of points for the entire evaluation of the proposal narrative was 60 points. The evaluation form was provided to reviewers as a fillable PDF, with options to select a score of one, two, or three from a dropdown menu for each subsection, and a space for additional comments provided for each section as well as an additional space for overall feedback.

Upon receiving the completed evaluation forms from each reviewer, the feedback from each reviewer was considered both individually and collectively. Special attention was given to subsections receiving an individual and/or average score below three, and trends in feedback scores and common themes in commentary were carefully considered. After a thorough review of feedback and consultation with the thesis committee, the proposal was edited and finalized.

Protection for Human Subjects

The PIVOT Program is a proposed educational intervention, and the target population and implementation site(s) of the program dictate that protection of human subjects is incorporated in its implementation plan. The program involves working with human subjects below the legal age of consent in the state of Georgia, and therefore regulations for working with children are applicable. The program is also subject to specific regulations for programs implemented in public schools. The following discussion will provide an overview of applicable regulations and considerations that will be made within the proposed program to meet these requirements.

Human Subjects Involvement, Characteristics, and Design

Program participants will include children enrolled in sixth, seventh, and eighth grades, ranging approximately from ten to fourteen years of age. The number of participants in the program have not yet been determined, but will be limited to number of students who can be accommodated according to available resources and personnel. Participants may include students with special education needs that require an Individual Education Plan (IEP), or with disabilities that qualify them for Section 504 status.

To be eligible for inclusion in the program, students must:

- Be currently enrolled in one of the participating schools
- Have committed a first or second occurrence of violation of certain school infractions for which OSS or justice referral would apply
- Be willing and able to provide written informed assent
- Have parental/guardian(s) that are willing and able to provide written informed consent

For students who are justice referred, their offense must qualify for diversion as determined by juvenile court. Eligibility will be determined by a school administrative team that consists of the school principal or designee of the principal, a student behavioral specialist, and members of the school IEP/Section 504 committees. Exclusion criteria will include certain infractions that are more severe, such as those determined after threat assessment to involve true potential danger to others, or infractions that are in their third occurrence or beyond.

The PIVOT program is proposed as an early intervention for prevention of exposure to the juvenile justice system and its correlated short and long-term poor outcomes. The program is targeted toward children due to evidence of effectiveness of interventions at stages earlier in an individual's life course. It addresses this young population during early adolescence, a key transitional time period of development where positive experiences and protective factors can significantly influence their life trajectory; lack of these experiences and protective factors, in combination with other socioeconomic and other factors commonly faced by the target population, could increase their risk for poor outcomes. Prior to implementation, the proposed program must be approved by the following entities:

- Fulton County Schools, for compliance with district policies
- Woodland Middle School and Ronald E. McNair Middle School administration, for alignment with Achievement Zone school program goals and logistics of implementation
- Fulton County Board of Commissioners, for meeting grantee requirements of eligibility and merit for funding via the Community Services Program grant
- Fulton County Juvenile Court, for meeting requirements of diversion for applicable cases
- Georgia Department of Education, for access to de-identified student data

Human Subjects Materials Collected

Records and data that are collected at any stage of the proposed program will be for the specific purposes of determining eligibility for participation, determining how program elements will be tailored to each participant, and evaluation purposes. The following is a description of sources and use for collected material:

- Disciplinary records, used to determine eligibility for participation in the program and to compare type and frequency of disciplinary events for individual participants for up to two terms after participation in program.
- Academic records, used to observe academic performance during and postprogram for up to two terms after participation in program
- Records and data collected in support of referral to services for physical or mental health, behavioral assessments, and learning supports
- Holistic Student Assessment (HSA) and Holistic Student Assessment
 Retrospective (HSA-R), used to assess socio-emotional development and to inform parents, mentors, school administrators, and program staff of particular needs that the program will aim to address, and to evaluate students' growth in social-emotional skills after participation in the program
- IEP and Section 504 status, for program modifications in compliance with supports predetermined to meet the needs of students with disabilities or in special education
- Post-program assessments where information will be collected on academic performance, demonstration of life skills, and resolution of behavioral issues during the course of the program and through the following year

• Evaluation survey data from student participants, parents/guardians, mentors, school administrators and staff involved in program, and community partners that student participants have interacted with

Data obtained from school academic and disciplinary records will be collected, managed, and protected in accordance with all applicable guidelines and laws for the protection of the privacy of participants including the Family Educational Rights and Privacy Act (FERPA), which provides certain rights to parents over their children's academic records, including demographic information, grades and test scores, disciplinary status, and attendance records. Data from school records will be collected in accordance with FERPA guidelines, limited to school administration who already have access to the data, and program administrator and limited staff. Data obtained from participants via assessments and program materials will be subject to the Protection of Pupil Rights Amendment (PPRA), which grants parents control over content of materials their children may encounter in a program (i.e. surveys, instructional materials, and evaluations) that fall within certain categories deemed sensitive in nature. Categories include but are not limited to: mental and psychological health of the student and/or their family members; sexual behavior; and illegal, anti-social, self-incriminating or demeaning behavior. Parents will have access to all evaluations, surveys, and other data collected in the program, and can withdraw consent for any applicable data collection tool or instructional material. The collection of any personally identifiable information (PII) will be subject to authorization of disclosure that will be requested as part of the assent/consent process. Data may be collected verbally, in written form, or electronically, in a manner that protects the privacy of participants. Records for each

participant will be have PII removed, but will be assigned a record code as a unique descriptor to be used to match individual-level records for evaluation. Records will be stored electronically and encrypted, with access limited to school and program personnel as dictated by FERPA guidelines and disclosure agreements. Mentors and others working with participants in program activities may receive limited access to data such as HSA results, IEP, and learning supports for the purpose of meeting the needs of the students.

Recruitment and Informing Subjects of Program

Participants will be recruited from each school based on their disciplinary status and recommendations of school administrators. Eligible students and their parent(s) or guardian(s) will be contacted via the primary means of contact (phone, email, or letter) as designated by the parent with the school, with confirmation of suspension and the PIVOT Program option made in writing and delivered via first class mail or in person, according to school regulations. This initial contact will invite parent(s) or guardian(s) to meet with school administrators and program staff in order to receive detailed information about the program as a voluntary alternative to OSS (or as a juvenile court diversion program for applicable students), and to provide parental or guardian agreement for participation as well as assent to participate from student participants. During the in-person meetings, designated program staff members will provide information about program activities, expectations, requirements, benefits, and risks. The staff members will answer questions about the program and participation agreement/assent process. Participation agreement and assent will be documented in written form and will specify what data will be collected by program staff, the purpose for collecting the data, and how the data will be

protected. The forms for parental/guardian agreement will be written at an 8th grade level as determined by the Flesh-Kincaid reading score. Assent forms for participants will be developmentally tailored for age and written at no higher than a 4th grade reading level.

Potential Risks to Human Subjects

The PIVOT Program will pose minimal risk to its participants, with the probability of program activities causing no more harm or discomfort to participants than their normal activities. Potential risks associated with participation in the PIVOT program include the following:

1) Breach of confidentiality: Data will be collected that includes sensitive academic and personal information. This introduces a risk of exposure of such information to others, which, if linked to a specific participant, could adversely affect the participant's relationships with peers, future educational pursuits, or other arenas that could subject participants to prejudice or discrimination. Risk of breach of confidentiality will be minimized during and after participation in the program. All data that is collected from school records and assessments will be deidentified, encrypted, and stored with a unique identifying code, allowing for evaluation of data without PII. Access to the master list of identifying codes will be limited to the Program Director and a designated program staff member. The list will be stored in a secured location, separate from data to be evaluated. Data will be collected by program staff who are trained in procedures to ensure participant confidentiality. Identification codes for participants will be securely purged from program records after a period of seven years after completion of the program.

2) Adverse psychological responses: In the assessment process and/or during the course of participation in the program, there is the potential for risk for participants that could experience feelings of discomfort or embarrassment when asked to discuss their behavioral challenges while being guided in identifying factors contributing to the offending behavior(s). Risks of this nature will be mitigated by the availability of school counselors, mentors and other supports that are especially trained to help students overcome such responses. Students will also be offered the option of skipping assessment questions and/or program activities that elicit adverse responses, and students will have the option to terminate their participation in the program at any time.

Benefits of Program to Human Subjects and Society

Benefits to program participants may include the exclusion of suspension from their school disciplinary record and/or the opportunity for diversion from commitment to a juvenile detention center. Other potential benefits include the opportunity to receive individualized academic support and wraparound services to address other factors that influence success in school, as well as opportunities for extracurricular exposures that provide positive personal impact.

Anonymized and aggregated data that demonstrates program impact may be shared with stakeholders including parents and students, local school district administrators, and community and civic leaders. This data may support the merits of the PIVOT Program as a means of reducing the number of students in contact with the juvenile justice system by way of reducing OSS and juvenile justice referrals. Mitigation of the minimal risks of participation in the program help to further ensure that the benefits of the program far outweigh the risks.

Chapter IV: Incorporation of Reviewer Comments

Introduction

This chapter details the results from the proposal evaluation forms completed by each of the five individuals that agreed to participate in this project as grant proposal reviewers. I would like to thank Margaret Cawood, Kim Farr, Dr. Charles Few, Monita Morton, and Eve Rose, all of who took the time and effort to review the grant proposal. The feedback that was provided has been an extremely valuable contribution toward the improvement and strengthening of the proposal.

Reviewer Scoring of RFP Evaluation Criteria

As discussed in Chapter III, each reviewer completed a proposal evaluation form based on criteria found in the RFP. The form (Appendix B) included individual criteria for each section of the proposal, for which each criterion received a numeric score. A field for recording specific comments for each of the proposal sections was also included in the evaluation form. Table 6 below summarizes the scores received for the proposal according to the criteria provided. For each reviewer, points for each section of the proposal were summed for a total score, with 60 points being the maximum possible score. Mean scores were also calculated for each individual criterion, as well as a mean total score.

Response to Reviewers' Scoring of RFP Evaluation Criteria

The proposal received generally favorable scoring in all categories with a mean score of 56 out of 60 possible points. Scores were notably lower from Reviewer 4, who awarded the proposal 46 out of 60 points. Two specific criteria (Fulton County Residents

SECTION	CRITERIA	Reviewer 1 (Cawood)	Reviewer 2 (Farr)	Reviewer 3 (Few)	Reviewer 4 (Morton)	Reviewer 5 (Rose)	MEAN SCORE
1. General	Describe the purpose of your agency and	3	3	3	3	2	2.8
Agency Information	the services that your agency provides						
2. Citizen Needs	Specific Need	3	3	3	3	3	3
	Population Service Area	3	3	3	2	3	2.8
	Fulton County Residents Served	3	3	3	1	3	2.6
	Target Population	3	3	3	2	3	2.8
	Statistics About the Need	3	3	3	2	3	2.8
3. Approach and	Activities and Services Provided	3	3	3	2	3	2.8
Design	Activities and Services Accomplished	3	3	3	1	3	2.6
	Strategic Priority Area Program Objectives	3	3	3	2	3	2.8
	CSP Funding Priorities	2	3	3	2	1	2.2
	Community Collaborative Relationships	3	3	3	2	3	2.8
4. Program	Methods and Specific Goals	3	3	3	2	3	2.8
Performance	Milestones	3	3	3	3	3	3
Measures	Data Collection and Sources	3	3	3	2	3	2.8
	County-Defined Performance Measures	3	3	3	3	1	2.6
	Agency-Defined Performance Measures	3	3	3	2	3	2.8
5. Conclusion	Summary statement with solutions	3	3	3	3	3	3
	Focus on required need and relevancy	3	3	3	3	3	3
6. General	Written with no errors	3	3	3	3	3	3
Attributes	Research data is acceptable and relevant	3	3	3	3	3	3
TOTAL		58	60	60	46	56	56

Served in the Citizen Needs section, and Activities and Services Accomplished in the Approach and Design section) received the lowest score of 1 from this reviewer, while receiving the highest score of 3 from all other reviewers. It is unknown what specifically lead to the lower score from Reviewer 4 for these criteria in particular since there was no additional feedback, and since the scores received from others reviewers suggest that the criteria were well met. For many other criteria that received a score of 2 from Reviewer

4, specific feedback was provided. This feedback, and the resulting modifications to the proposal, are discussed in further detail below.

The proposal also received higher scores than merited from some reviewers in certain categories. For instance, to receive a score of 3 in the area of CSP funding priorities, the proposal would have to address all three priorities, which include: Kindergarten readiness (and early childhood development ages 3-5 years); English Language Arts Standards (ELA), Math and Science proficiency; and contributing factors to unhealthy behaviors in children and youth. A minimum of one of these priorities is required to be addressed in the proposal. The proposal directly addresses contributing factors to unhealthy behaviors in children and youth, and describes how the program may potentially address ELA, math, and science proficiencies as participants receive academic support. A score of 2 is the highest possible score for this proposal since the program does not address kindergarten readiness and early childhood development, and therefore no adjustment will be made in this section based on scores lower than three. The proposal also received a generous score of 3 from most reviewers for the selection of three County-defined performance measures. However, the proposal only addresses one County-defined performance measure, and several Agency-defined measures. Because the proposal describes only performance measures that are pertinent to the program, no adjustments will be made to this section based on the score of 1 received by Reviewer 5.

Reviewer Comments from Evaluation of Proposal

With the exception of Reviewer 2 (Kim Farr), all comments were made within the comments field at the end of each section of the proposal within the evaluation form, as well as additional comments at the end of the form. Ms. Farr entered most of her
comments as notes within the copy of the proposal provided to her. Her comments have been notated according to the location where they occur within the proposal.

Comments from Reviewer 1 – Margaret Cawood

<u>Comment 1 (Section 2- Citizen Needs)</u>: The information clearly identified the vulnerabilities and risk factors of youth and that school expulsion doesn't address the underlying needs. However the statement that early prevention measures (I would call early intervention) reduced the risk of justice exposure and subsequent poor health outcomes implies that the justice exposure causes the poor health outcomes. My experience and research review leans more to the perspective that the justice system adds additional risk factors (separation from family/community, negative peer group, trauma etc.) and cannot adequately address vulnerabilities and risk factors as effectively as early intervention and community resources.

<u>Response to Comment 1</u>: On page 78, paragraph 2, lines 8-10, I clarified that poor health outcomes are correlated with, rather than caused by, prior justice exposure.

<u>Comment 2 (Additional Comments)</u>: I am very impressed with the proposal and hope that someone is able to submit it for funding. We use PBIS within the DJJ system, thus the logic of using these interventions as a Tier 2 or 3 intervention is excellent. In addition to the comment I added, another thought is that PIVOT program implements protective factors (Search Institute's 40 Developmental Assets).

<u>Response to Comment 2</u>: On page 79, paragraph 1, line 4-7, I added sentences to highlight that the program implements protective factors against delinquency.

Comments from Reviewer 2 – Kim Farr

<u>Comment 1 (Section 2- Citizen Needs)</u>: [Page 76, paragraph 3, line 5] This sentence seems to repeat the point in the one before it. And the topic sentence seems to address this as well. I'd remove it or use it to replace the second sentence.

<u>Response to Comment 1</u>: I edited the paragraph 3 for clarity and to eliminate redundancy.

<u>Comment 2 (Section 2- Citizen Needs)</u>: [Page 77, paragraph 1, line 6] It would be helpful to know why this is challenging for schools. If schools are imposing the punishment, how are they unable to determine if it's the right one?

<u>Response to Comment 2</u>: I added a sentence in this paragraph to clarify that schools may revert to zero tolerance policies due to lack of resources and support for implementation of alternative policies.

<u>Comment 3 (Section 2- Citizen Needs)</u>: [Page 77, paragraph 3, line 8] I understand that health is affected by a student going down this path, but perhaps explicitly state the correlation. You have several supporting statements here, but there needs to be at least one that demonstrates the correlation [between] health and incarceration.

<u>Response to Comment 3</u>: The sentence in this paragraph that states "Research supports the assertion that adolescent criminal justice involvement disrupts the path to adult wellbeing and health" introduces the correlation. I moved the sentence mentioned in the next reviewer comment (Comment 4) directly following this sentence as an additional supporting statement that helps clarify correlations between health and incarceration and provides a better flow of supporting statements. <u>Comment 4 (Section 2- Citizen Needs)</u>: [Page 78, paragraph 1, line 2] I think this statement almost does the job to make the case for health related outcomes. Perhaps move it up in this paragraph and then add a phrase or two to explicitly tie health and incarceration together.

<u>Response to Comment 4</u>: As mentioned in response to Comment 3, I moved this statement within the preceding paragraph so that correlations between health and justice involvement are clearer.

<u>Comment 5 (Section 2- Citizen Needs)</u>: [Page 78, paragraph 3, line 13] I would remove the word "yet" because "yet otherwise" made me read the sentence several times.

<u>Response to Comment 5</u>: I removed the word "yet" for clarity.

<u>Comment 6 (Additional Comments)</u>: Expound on the risks to health related outcomes. Specifically state how incarceration etc. correlates.

<u>Response Comment 6</u>: I have addressed these issues in response to previous comments.

Comments from Reviewer 3 – Dr. Charles Few

<u>Comment 1 (Section 2- Citizen Needs)</u>: It might be a good idea to obtain and analyze the Fulton County Schools Code of Conduct for the 2017-2018 school year in order to identify discipline infractions, their assigned tiers, and the suggested consequence.

<u>Response Comment 1:</u> On page 80, paragraph 3, I've added a reference to the Fulton County Schools Code of Conduct for 2017-2018 which provides infraction and discipline guidelines that will factor into the determination of student eligibility for the program. <u>Comment 2 (Section 3- Approach and Design)</u>: In reference to community collaborative relationships, where will the mentoring sessions take place? Also, how will you address transportation for students in regards to attending the mentoring sessions?

<u>Response to Comment 2:</u> On page 81, paragraph 4, I added specific detail about oncampus and potential off-campus locations for mentoring sessions, and on page 82, paragraph 2, I noted that mentors or other program team members provide transportation to off-campus sites.

<u>Comment 3 (Additional Comments)</u>: As a former administrator who processed discipline referrals for high school students, I have witnessed countless incidents involving students that most often resulted in suspension and/or expulsion. Most of the time, these students have idle time during this consequence period and they are not participating in any positive interactions that can assist with correcting their behavior. I believe that the PIVOT program can be another avenue for these students that will enable them to not [only] learn about alternative actions to prevent negative outcomes but to also learn about themselves individually.

<u>Response to Comment 3</u>: No changes were made based on this comment. The positive feedback is well appreciated.

Comments from Reviewer 4 – Monita Morton

<u>Comment 1 (Section 2- Citizen Needs)</u>: The program noted that it will target students based on their infraction, discipline and academic history and other circumstances that

could be affecting behavior at school. This is too vague. Who will determine exactly who will be assisted.

<u>Response to Comment 1:</u> On page 80, paragraph 2, I've added more detail about the specific school personnel that will be involved in determining student eligibility in the program, including considerations for students in special education programs and/or those who have been identified as having a disability as either status may factor into disciplinary measures and student eligibility for the program.

<u>Comment 2 (Section 3- Approach and Design)</u>: The program indicated that it is seeking several partnerships that have not been confirmed. Who will provide services if these agencies are not able to assist. What is the contingency plan?

<u>Response to Comment 2:</u> Since the program is hypothetical, the partnerships named are also hypothetical. I've modified this section to list these organizations as, hypothetically, having solid commitments to the program. Changes have been made on page 86, paragraph 3, and page 87, paragraphs 1 and 2 to reflect that the listed organizations are actual partnerships. At a minimum, the Emory-based groups will function as solid commitments for this section. Contingencies will be the adjustment of program capacity based on the number of commitments for the term, with a minimum capacity based on Emory-based mentor and program groups that have a full-time commitment to the program.

<u>Comment 3 (Section 4- Program Performance Measures)</u>: Did not give a clear precise method for tracking the outcomes with the data tools provided. I would like to have a clearer understanding of how the program will assist the parents.

<u>Response to Comment 3:</u> Quantifiable key performance indicators (KPI's) have been added to the table on pages 90-92 that details program goals and methods. Sources for capturing data for KPI's are detailed in the listing of program implementation points (page 85, bullet point 5) and in the discussion of program performance measures on page 90, paragraph 1 and bullet points 1-6. To more thoroughly address parental involvement, I've added several points in the Approach and Design section for pre-, mid- and postprogram meetings with parents to familiarize parents with the program, emphasize their role in the student's success, and link parents with support and resources (page 85, paragraph 2, point 1; page 85, paragraph 3, points 2-3, and page 86 paragraph 1 point 6). There are also KPI's to be reported that are specifically focused on parental engagement with their student in the program (rows 5-6, column 3 of table, page 91-92).

<u>Comment 4 (Additional Comments)</u>: In theory it seems like a great program. The guidelines for entrance into the program could be more specific. The program could benefit from a more direct connect with the parents and services.

<u>Response Comment 4</u>: I have addressed both of these subjects in responses to previous comments.

Comments from Reviewer 5 – Eve Rose

<u>Comment 1 (Section 1- General Agency Information)</u>: The program description is thorough but it is not clear if this is an agency, or where the program is housed. It is clear who developed this pilot program but not who runs it or where it resides. <u>Response to Comment 1:</u> Since the program is at this point hypothetical, I have not included extensive detail about personnel or location of operation for the program. I added a brief mention (page 75, paragraph 1) that Rollins School of Public Health (RSPH) faculty and students will serve as program staff and that operations will take place in a space on the Emory University campus within RSPH.

<u>Comment 2 (Section 2 - Citizen Needs)</u>: Good section! You should probably add a few citations:

Cite "Community-based programming is a demonstrated effective means of prevention"

Cite "DHHS need for initiatives that involved youth-adult partnerships"

Cite -how these initiatives are a protective factor against justice involvement.

<u>Response to Comment 2:</u> I added the necessary citations for each of these statements.

<u>Comment 3 (Section 3 - Approach and Design)</u>: Just a few things: you combine "current and potential" partnerships- but it is not clear, besides the 2 schools, who you have actual commitments from. If I was a funder, I would be nervous as the entire program rests on the partner's ability to provide these services. The other big gap I see is that capacity is not addressed. With 330 OSS in one school and 157 in the other, what % of youth will screen eligible for the program? What % do you anticipate will enroll once offered a spot? How many can the program serve? Will there be an issue recruiting enough mentors?

<u>Response to Comment 3:</u> Similarly to my response to Ms. Morton's comment #2, since the program is hypothetical, the partnerships named are also hypothetical. I've modified this section to list these organizations as, hypothetically, having solid commitments to the program. Changes have been made on page 86, paragraph 3; and page 87, paragraph 1 to reflect that the listed organizations are actual partnerships. To address capacity, I have clarified on page 87, paragraph 2 that capacity will be determined each semester by the number of mentors and program opportunities available per semester, with a minimum capacity determined by mentors and organizations working directly with the program from Emory University. If the number of eligible students exceeds program capacity, students and parents may have to apply and participate on a first come first served basis.

<u>Comment 4 (Section 4: Program Performance Measures)</u>: Good section. I don't see in your performance measures a rate of program completion, only information on those who stay enrolled. So maybe add # enrolled; # completing all program requirements; # dropped out (and reasons for drop-out).

<u>Response to Comment 4:</u> I've added measures for rate of completion within the table of program goals, methods, and KPI's on page 90. Specific measures include rates of enrollment, completion, and drop-out for the program. Data collection via survey instrument or information collected in person, described on page 86 (paragraph 2, bullet point 4) will capture reasons for drop-out, when applicable.

Comment 5 (Section 6 - General Attributes): Well written and organized.

<u>Response to Comment 5:</u> No modifications. I appreciate the positive feedback.

<u>Comment 6 (Additional Comments)</u>: Great job with the proposal. The main area for clarification, as mentioned earlier, would be to address the capacity issue. Somehow estimate the # youth who will be eligible, # you expect to sign-up, and then (since the

number may be high) address how you will find enough mentors/partners, or institute some enrollment cut-off.

One other thought- I did not see any potential challenges considered and possible solutions. This may not be in the scope of the proposal request, but for things like poor attendance at teacher and/or mentor trainings, low participation in your outcome surveys to measure program success, partner agency drop-out, etc. it would be good to show you have considered these things and have solutions.

<u>Response to Comment 6</u>: I've added a brief section addressing potential challenges and solutions within the Approach and Design section of the proposal (page 87-88). Challenges addressed include some of those suggested by the reviewer (i.e. school staff trainings and low participation in outcome surveys), as well as barriers to student and parent participation in the program. The section was also edited for flow after the additions described here.

Chapter V: Grant Proposal

The following chapter presents the final version of the proposal for the PIVOT Program in response to the application guidelines outlined in the Requests for Proposal 16RFP120217A-MH for the 2017 Community Services Program for Fulton County Department of Housing and Community Development. The final version incorporates the suggested edits by the thesis committee chair, thesis field advisor, and five independent reviewers of the proposal.

THE PIVOT PROGRAM

A RESPONSE TO THE REQUEST FOR PROPOSALS (16RFP120217A-MH) FOR THE FULTON COUNTY DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT 2017 COMMUNITY SERVICES PROGRAM

1. GENERAL AGENCY INFORMATION

Describe the purpose of your agency and the services that your agency provides.

The PIVOT Program was created to provide opportunities for students to learn about health, advocacy, and community engagement as an alternative to actions and consequences that threaten their life trajectory. We are a pilot program that provides a new prevention resource that addresses students at risk for involvement in the juvenile justice system via school disciplinary action. The PIVOT Program was developed and will be implemented by faculty and students at Rollins School of Public Health (RSPH) at Emory University, and will operate from a site on the University campus within RSPH facilities. The program's broad aims are to reduce poor health outcomes correlated with criminal justice involvement and incarceration among adolescents and young adults. By targeting youth for prevention and diversion from the justice system, the program aims to reduce the risk of poor outcomes in youth facing a myriad of other risk factors. The PIVOT Program addresses young adolescents in middle schools as a measure of early prevention, and provides training for educators and mentors working with students through disciplinary problems and underlying issues.

There is a need for initiatives that will prevent and/or divert students in Fulton County Schools facing school disciplinary action away from pathways into the criminal justice system, thus reducing the likelihood of poor health outcomes that are correlated with involvement with the justice system. The PIVOT Program will provide opportunities for qualifying students who choose to fulfill disciplinary requirements within the program as an alternative to exclusionary discipline or juvenile justice referral. These students will have the opportunity to engage in community-oriented activities while learning about topics that affect them individually as well as their community, and they will participate in a project that incorporates their new experiences with skill building that can reduce the likelihood of future justice involvement and related poor health outcomes. The program will also facilitate partnerships with social and/or health service providers to ensure that students receive the support necessary for a successful outcome.

Service delivery/impact goals for the program include:

- Enrolling qualified students who elect to participate in lieu of exclusionary discipline or court referral, thereby reducing the rate of each
- Assisting in needs assessment and facilitating access to services that address risk for delinquency or other pertinent needs
- Matching students with mentors and programs or service opportunities that engage their interests while providing an alternative learning opportunity
- Providing training for program facilitators, community organization leaders, university students, and other potential volunteers to serve as mentors for students in the program

2. CITIZEN NEEDS

Describe the need (or problem) in Fulton County that you are proposing to address with CSP funding.

THE NEED: Maintaining a safe and effective learning environment in schools is a priority for school districts across the nation, and finding ways to accomplish this continues to be a challenge. In the 1990s, zero-tolerance policies became a popular strategy to help meet the challenge within school districts nationwide, including Fulton County Schools and other districts in the state of Georgia and within the Atlanta metropolitan area. These policies were implemented in response to fears about school violence and youth crime. Although schools must do all that can be done to ensure the safety of learning environments, controversy continues to surround the use of zero-tolerance policies and their procedures. Studies have shown that there has been no conclusive evidence that zero-tolerance policies have increased levels of safety in schools.¹

With their broad and inflexible application, zero-tolerance policies have had unintended negative consequences. Enforcement of these policies have commonly lead to disproportionate discipline for students who are minimally disruptive, often with first-time or minor infractions. Disciplinary action against students that violate the strict policies has most often involved exclusionary discipline which includes suspension and expulsion of students. Unfortunately, such discipline has been applied often without consideration of other factors contributing to a student's problems in school (e.g. bullying, adverse childhood experiences, mental health issues, or socioeconomic factors), where a more comprehensive intervention would be more appropriate.

Even as many school districts have begun to reconsider zero-tolerance policies, exclusionary discipline continues to be utilized at an alarmingly high rate. While serious violations in conduct may warrant suspension, expulsion, or even juvenile court referral, it has not been uncommon for these disciplinary policies to be applied for much lesser offenses. For instance, suspensions may be applied to students committing minor infractions within a category of behavior that triggers a suspension (e.g. minor scuffles characterized as fighting, or swearing in class characterized as disruptive insubordination).

Studies have shown that gang involvement and other delinquent behaviors are some of the possible unintended consequences of exclusionary discipline as students are at higher

¹ American Psychological Association Zero Tolerance Task Force. (2008). Are zero tolerance policies effective in the schools?: an evidentiary review and recommendations. *American Psychologist*, *63*(9), 852-862. doi:10.1037/0003-066x.63.9.852

risk for these when not in supervised settings.^{2 3} Such discipline actually increases the risk of delinquency for students who have otherwise demonstrated a lower risk, having a higher commitment to school and fewer behavioral issues outside of the infraction for which exclusionary discipline is applied. Although the Georgia Department of Education has designated a progressive discipline process to be applied with a number of situational factors considered, it has still remained challenging for many schools to ensure that suspensions, expulsions, and even arrest and juvenile court referrals are not applied in cases where alternative methods of discipline may be more effective with less of the associated risks to the students. This is possibly due to lingering practices rooted in zero-tolerance discipline policies that manifest within schools that do not have adequate support for the adoption of alternative disciplinary methods.⁴

Exclusionary discipline can be problematic if employed excessively or with possible bias. There are schools where exclusionary discipline is disproportionately applied to minority students, especially those who are African American. Recent reports have indicated that this problem continues to be an issue statewide, with Fulton County Schools (FCS) among other metro Atlanta districts reporting similar disproportionalities. Additional focus is warranted for addressing high rates of exclusionary discipline within schools with a majority-minority population, a phenomenon that occurs in several schools within FCS.

While many districts have begun to seek alternatives to zero-tolerance policies, many students remain vulnerable to disciplinary action that may unnecessarily expose them to higher risk for involvement in the juvenile justice system, a process more commonly called the "school to prison pipeline." Because of the contribution of exclusionary discipline and juvenile justice referral to risk of future juvenile justice involvement, there is a need to reduce the number of students subjected to these practices whenever possible. The negative effects of these practices include an increased risk for immediate and long-term poor outcomes, including health outcomes, that may be avoidable with alternative intervention. Research supports the assertion that adolescent criminal justice involvement disrupts the path to adult well-being and health. Justice-involved adolescents experience varying degrees of disruption during a transitional period when educational attainment and establishment of a vocation usually occur, leading to missed opportunities to establish a socioeconomic position that will influence health during their life course.⁵

² Monahan, K. C., S. VanDerhei, J. Bechtold, and E. Cauffman. "From the School Yard to the Squad Car: School Discipline, Truancy, and Arrest." *Journal of Youth and Adolescence* 43, no. 7 (Jul 2014): 1110-22. http://dx.doi.org/10.1007/s10964-014-0103-1.

³ Osgood, D. Wayne, Janet K. Wilson, Patrick M. O'Malley, Jerald G. Bachman, and Lloyd D. Johnston. "Routine Activities and Individual Deviant Behavior." *American Sociological Review* 61, no. 4 (1996): 635-55. http://dx.doi.org/10.2307/2096397.

⁴ Teske, S. C. "A Study of Zero Tolerance Policies in Schools: A Multi-Integrated Systems Approach to Improve Outcomes for Adolescents." *Journal of Child and Adolescent Psychiatric Nursing* 24, no. 2 (May 2011): 88-97. http://dx.doi.org/10.1111/j.1744-6171.2011.00273.x.

⁵ Zajac, K., Sheidow, A. J., & Davis, M. (2015). Juvenile Justice, Mental Health, and the Transition to Adulthood: A Review of Service System Involvement and Unmet Needs in the U.S. *Child Youth Serv Rev, 56*, 139-148. doi:10.1016/j.childyouth.2015.07.014

Juvenile incarceration is considered to be a determinant of health, correlated with worse health outcomes and poor social functioning throughout adulthood.⁶ Longitudinal studies have suggested that there is an independent association between incarceration during adolescence and poor physical and mental health outcomes in adulthood.⁷

Juvenile justice system involvement is correlated with both violent and nonviolent future crime and subsequent incarceration.⁸ Incarceration aggregates persons at higher risk for various health conditions such as mental health issues, substance abuse, and infectious and chronic diseases including asthma, hypertension, arthritis, cervical cancer, HIV and Hepatitis C.⁹ Post-release issues often include health related difficulties as a result of barriers encountered while attempting to reintegrate with society, such as difficulties finding work, housing, access to healthcare, and lack of emotional and social support.¹⁰ It is important to implement early prevention measures that reduce risk of criminal justice system exposure and risk of subsequent poor health outcomes that are correlated to such exposure.

Community-based programing is a demonstrated effective means of prevention.¹¹ The PIVOT Program employs evidence-based practices including mentoring, needs assessment and referral, academic support, community and civic involvement, and prosocial engagement with peers. Programs with these elements have a high potential to redirect students experiencing problems in school from pathways that hamper their education and potentially increase their risk for exposure to the criminal justice system. The transition from zero-tolerance policies and other punitively focused discipline to more comprehensive approaches, such as community-based programming, is not without scrutiny. A common barrier for such interventions is the notion that broadly punitive policies that are tough on discipline are necessary for maintaining a safe and productive educational environment, especially given the rise of violent crime among juveniles. However, a more tailored approach to discipline can be more effective, especially for those facing school discipline who are otherwise at a lower risk for delinquency. Programs that provide alternatives to exclusionary discipline function as a corrective behavioral intervention while reducing the opportunity for exposures that are likely to place them at higher risk for worse offenses. Keeping lower-risk students out of the

⁶ Barnert, E. S., Perry, R., & Morris, R. E. (2016). Juvenile Incarceration and Health. *Academic Pediatrics*, *16*(2), 99-109. doi:10.1016/j.acap.2015.09.004

 ⁷ Barnert, E. S., Dudovitz, R., Nelson, B. B., Coker, T. R., Biely, C., Li, N., & Chung, P. J. (2017). How Does Incarcerating Young People Affect Their Adult Health Outcomes? *Pediatrics*, *139*(2). doi:10.1542/peds.2016-2624
 ⁸ Petitclerc, A., Gatti, U., Vitaro, F., & Tremblay, R. E. (2013). Effects of juvenile court exposure on crime in young adulthood. *Journal of Child Psychology and Psychiatry and Allied Disciplines*, *54*(3), 291-297. doi:10.1111/j.1469-7610.2012.02616.x

⁹ Binswanger, I. A., Krueger, P. M., & Steiner, J. F. (2009). Prevalence of chronic medical conditions among jail and prison inmates in the USA compared with the general population. *Journal of Epidemiology and Community Health*, 63. doi:10.1136/jech.2009.090662

¹⁰ Brinkley-Rubinstein, L. (2013). Incarceration as a catalyst for worsening health. *Health & Justice, 1*(1), 3. doi:10.1186/2194-7899-1-3

¹¹ Office of Juvenile Justice and Delinquency Prevention. (2009). OJJDP In Focus. Retrieved from https://www.ncjrs.gov/pdffiles1/ojjdp/227345.pdf

juvenile justice system also serves as a cost-savings measure for reserving resources for higher risk delinquency cases. The PIVOT Program provides an alternative for students facing disciplinary action at schools with high rates of exclusionary discipline or court referral by providing students with the opportunity for exposures that will reduce their risk of further infractions while providing support and experiences that will improve academic outcomes. Students participating in the program receive support from mentors and other adult figures as well as opportunities for empowerment, development of social competencies, and prosocial peer interaction. These and other program elements serve as protective factors against delinquency and problematic behavior.¹²

UNDERSERVED POPULATION SERVICE AREA: The program will serve selected middle schools located within the FCS Achievement Zone. There are two middle schools that are currently within the Achievement Zone: Woodland Middle School and Ronald E. McNair Middle School. These, along with seven elementary schools, are feeder schools for Banneker High School, all of which are targeted for improvement and included in the Achievement Zone. According to the FCS website, these schools "experience high rates of mobility, poverty, crime risk, and a lack of intensive supports for struggling students." ¹³ The focus of the PIVOT Program dovetails with the stated goals for the Achievement Zone schools to "decrease out-of-school suspensions." The program provides an opportunity for students to remain in the academic environment while addressing behavioral issues, thus reducing the risk of problems students may encounter while outside of school supervision.

FULTON COUNTY SCHOOLS AND RESIDENTS SERVED: The PIVOT Program serves two neighborhood schools located within south Fulton County. Woodland Middle School is in Fulton County Commission District 5, within the East Point city limits. The school is centrally located in Ward C of East Point, in close proximity to Sykes Park, near the intersection of Stone Road and the Dodson Road Connector. According to the most recent U.S. Census data¹⁴, the poverty rate for the area is 33.1% for families with children under 18, compared to 21.1% statewide poverty rate and 13% poverty rate for the entire Fulton County Schools district. As of October 2017, Woodland currently has 925 students enrolled in sixth (34%), seventh (31%), and eighth (35%) grades, with most students' ages falling between 11 and 14 years old. The school experiences a high mobility rate (47.4%). Demographically, the school population is 48% male and 52% female. Ninety-two percent of the students are African American, and about 7% are Hispanic. Over 95% of the student population is eligible for free or reduced lunch, and the State of Georgia classifies 69% of the population as economically disadvantaged, as defined by students from households receiving SNAP or TANF, or students who are

¹² Development Services Group Inc. (2015). Protective Factors for Delinquency. Washington, DC: Office of Juvenile Justice and Delinquency Prevention. Retrieved from <u>https://www.ojjdp.gov/mpg/litreviews/Protective%20Factors.pdf</u>. ¹³ Fulton County Schools. "Fulton County Schools Achievement Zone Q & A." Last modified 2017. Accessed June 3, 2017.

http://www.fultonschools.org/en/divisions/acd/learncomm/AchievementZone/Documents/Achievement%20Zone Ques tion%20and%20Answer.pdf. ¹⁴ U.S. Census Bureau. 2011-2015 American Community Survey 5-Year Estimates. 2017.

homeless, in foster care, or are from migrant households. Exclusionary discipline rates at Woodland are nearly triple the average for middle schools in Georgia: Ten percent of Georgia students have at least one out-of-school suspension (OSS) during the 2014-2015 and 2015-2016 school years, while the overall rate at Woodland in 2014-2015 was 27% of all students receiving at least one OSS. A total of 729 out-of-school suspensions were given to students during this school year. The rate increased to 36% of all students receiving at least one OSS in the 2015-2016 school year.

Ronald E. McNair Middle School is located in Fulton County Commission District 6, within the newly incorporated City of South Fulton. The school is located proximally to Burdette Park near Flat Shoals Rd. and Old National Hwy (GA 279). As data specific to the City of South Fulton are not yet available, statistics from areas that share the school's zip code are used for context. The U.S. Census¹⁵ reports the 2015 poverty rate for residents of the 30349 zip code as 24.4% for families with children under 18 residing within the same zip code. The total number of students enrolled at McNair as of October 2017 is 830, with 32% in sixth, 33% in seventh, and 35% in eighth grades. Similar to Woodland, McNair has a mobility rate of 45.2%, significantly higher than the most recently reported median rates for Fulton County Schools (about 18% in 2014). McNair's student population is also 48% male and 52% female, and African Americans make up 96% of the population. More than 95% of students are eligible for free or reduced lunch, and 59% are classified as economically disadvantaged. McNair's exclusionary discipline rates are much higher than the state average, reaching 27% of all students having at least one OSS during the 2015 school year and having 649 incidents of OSS during that year. A decrease in the rate of out-of-school suspensions occurred in 2016, with 19% of students receiving at least one OSS.

HOW THE PROJECT WILL ASSIST THE TARGET POPULATION: Students who have committed minor or intermediate level infractions (as described in the 2017-2018 Fulton County Schools Code of Conduct), and whose offenses would otherwise result in OSS, will be considered for the PIVOT Program.¹⁶ Before a student is considered for the program, an initial assessment is conducted with a team of school administrators to assess whether a student qualifies. The school administrative team will consist of the school principal or designee of the principal, a student behavioral specialist, and members of the school IEP/Section 504 committees for students who are receiving special education services and/or have been identified as a student with a disability. Parents of eligible students will be notified that the student may have the option to participate pending current program capacity which may vary depending on available mentors. For students who are accepted, the program will be tailored to each student depending on the severity of the infraction, disciplinary and academic history, special education or disability status, and other circumstances that could be affecting behavior at school. Students will be

¹⁵ Ibid.

¹⁶ Fulton County Schools. (2017). Student Code of Conduct & Discipline Handbook Retrieved from <u>http://www.fultonschools.org/en/divisions/acd/supportserv/Documents/Student%20Discipline/Student%20Discipline%</u> <u>20and%20Code%20of%20Conduct1718%20final%20draft%20July%2028%202017%20821am%20-%202.pdf</u>

asked to commit to the eight-week program in lieu of receiving a formal out-of-school suspension. After acceptance into the program, the students are matched with a team of mentors, educators, community organizations, social and health service providers, and youth-centered organizations that will help address student behavior, find solutions that redirect a student's path, and provide the student with prosocial opportunities with other peers.

During the program, students will be matched with a mentor who will direct the student throughout the process and an advisor that will provide assistance by facilitating access to academic support and any social or health services deemed necessary. Mentors will meet one-on-one with students at a minimum of twice per week. As they build rapport, they will help identify the student's strengths, challenges, and interests while exploring the "why" behind the particular behavior for which the student was suspended. Mentors will help guide students in acquiring life skills by talking through issues such as coping with stress, decision making, and critical thinking.

Mentors will assist in facilitating a connection between students and community organizations that provide opportunities for positive peer engagement. Participation in organizations that focus on an area where the student has expressed interest can provide opportunity for prosocial connection with a new peer group, which can be an important factor in modifying behavioral patterns leading to disciplinary measures. These groups may vary in focus on such subjects as health and wellness, volunteerism, community advocacy and civic engagement, science and math, art, or other topics. Participation will be contextualized as part of a strategic alternative to problematic behavior, as well as a possible venue for students to exercise skills and strategies that are discussed with their mentors.

Mentors will also assist students with the concept and completion of a culminating project. Students will be guided through a project or series of activities designed to provide insight about the precipitating behavioral issue and its consequences, and empowerment for changing behavior, environment, and other factors. The project will also provide an opportunity to enhance skills complementary to school curriculum, with a focus on skills in the fields of science, technology, engineering, arts, and mathematics (STEAM). Projects or activities can incorporate community and/or civic engagement as well as curricular or co-curricular service learning opportunities, depending on the student's situation. These projects may be completed in conjunction with students' participation in new peer groups.

Throughout the program, students will receive academic support in completing assignments given during their time outside of the classroom. Support may include guidance from school faculty as well as tutoring and assistance from community volunteers. For many students, academic support will be given in a location within school grounds. If a student is not able to remain at their school campus for a period of time due to the nature of their infraction, a workspace in a nearby facility, such as a public library or community center, will be provided by one of the program's community partners where academic support can be received and assignments completed. Students' time outside of the classroom may vary, and students will continue meeting with their mentors and completing other program activities outside of school hours after returning to the classroom for the duration of the program.

As students complete the program, post-assessments will be administered to ensure that appropriate supports are maintained beyond the duration of the program. Students may be offered the opportunity to continue voluntary involvement with organizations that they have participated in during the program.

The PIVOT Program provides students with the opportunity to convert experience leading to discipline into a valuable learning opportunity in a structured environment while reducing potentially unsupervised time spent out of school, thus reducing the risk of events leading to adolescent criminal justice involvement. The activities available during time spent in the program will provide continuity of academic and other skill development while concurrently addressing root causes of disruptive behavior. The opportunities will build upon and coordinate with existing programs, community assets, and community infrastructure, and may take place on site as well as in other sites within the school community that are easily accessed by the student (e.g. community centers, church buildings, or other available facilities). Transportation to off-campus workspaces may be provided by mentors or others in the student's PIVOT program support team.

There is broad support for programs such as the PIVOT Program for addressing the need to prevent and divert students from justice involvement via school disciplinary processes. The U.S. Department of Health and Human Services cites the need for initiatives that involve youth-adult partnerships that facilitate youth engagement in their communities and develop problem-solving skills needed for their success during this second decade of life and beyond.¹⁷ Opportunities for this level of engagement have been shown to be a protective factor against justice involvement.¹⁸ On a local level, both Woodland and McNair have recently implemented Positive Behavioral Interventions and Supports (PBIS), an evidence-based initiative that encourages a healthy school climate by reinforcing positive behavior and implementation of early intervention for students needing assistance and support with correcting problem behavior. The PIVOT Program can serve as a structured intervention option for students who may require more individualized or intensive support for school success, designated as Tiers 3 or 4 of the Georgia Student Achievement Pyramid of Interventions.¹⁹ While there are other interventions that have been implemented with a similar focus, the PIVOT Program provides a unique opportunity to address school-specific issues as well as those

¹⁷ U.S. Department of Health and Human Services. (2017). Why Engage Youth. Retrieved from https://www.hhs.gov/ash/oah/tag/game-plan-for-engaging-youth/why/index.html

 ¹⁸ Development Services Group Inc. (2015). Protective Factors for Delinquency. Washington, DC: Office of Juvenile Justice and Delinquency Prevention. Retrieved from <u>https://www.ojjdp.gov/mpg/litreviews/Protective%20Factors.pdf</u>.
 ¹⁹ Georgia Department of Education. Addressing Climate, Safety, and Discipline in Georgia Schools: School-Wide Positive Behavioral Interventions and Supports, by O'Connell, G., M. Gudenrath, T. Davis, S. DeMuth, and J. Hill, 2013.

pertaining to Achievement Zone objectives. Funding from the Community Services Program in the amount of \$100,000 would support the PIVOT Program development, adaptation, and implementation for each of the schools.

STATISTICS ABOUT THE NEED: There are over one million adolescents in GA, nearly 10% of the total population, and the proportion is similar in Fulton County. Approximately 21,600 middle school students are enrolled in the FCS system. The statewide out-of-school suspension rate, that is, the percent of the student population receiving at least one OSS within a school year, has declined from 9.4% in 2007 to 6.7% in 2014. Fulton County Schools has seen a decline in the same period from 8.3% to 6.5% system wide. As noted above, Woodland and McNair Middle Schools continue to far exceed the average OSS rate. Total counts of discipline incidents include both violent and non-violent infractions, with most incidents subjectively categorized under "disorderly conduct," or "other student incivility." At Woodland, about 49% of all incidents fell under these three categories, and at McNair, about 42%. Fighting accounted for approximately 20% of reported discipline incidents at both schools.²⁰ In 2015, the student police/court referral rate in Georgia was 3.2 per 1000 students, lower than the national average of 5.8 per 1000 students. However, disproportionality exists on national, state and county levels when observing referrals for African American students. On a national level, while 15.9% of the total student population was African American, they comprised 26.9% of students referred to the justice system. In Georgia, only 37.2% of all enrolled students were African American, but 51.3% of referred students - more than half—were African American.²¹ Other metro Atlanta counties utilized justice referral for school disciplinary issues at a much greater rate than Fulton County in 2015. However, disproportionate numbers were still apparent when observing suspension rates. While making up only 42% of the total FCS population, African Americans comprised 81% of students facing suspension that year.²²

Disproportionate minority contact is a national issue, addressed in federal policy such as the Juvenile Justice and Delinquency Prevention Act (JJDPA) as well as in recent juvenile justice reform in Georgia. This issue is of concern for both justice involvement and school suspension, which are correlated and have similar implications. Higher suspension rates are correlated with higher dropout rates and personal and societal costs. A 2015 study indicated that a student with one occurrence of a suspension was 23.5% more likely to drop out of high school than a student with no suspensions. Personal costs of dropping out for these students include lost educational opportunity, lost wages, poorer health outcomes and reduced economic stability, and societal costs include lost tax

 ²⁰ Georgia Department of Education. *Discipline Incident Type Counts, School Level; School Year 2015-16 Student Record Data Collection System (Sr 2016).* ²¹ Wieder, B. and C. Zubak-Skees. "A State-by-State Look at Students Referred to Law Enforcement." The Center for

²¹ Wieder, B. and C. Zubak-Skees. "A State-by-State Look at Students Referred to Law Enforcement." The Center for Public Integrity. Last modified October 29, 2015, 2015. Accessed May 2, 2017.

https://www.publicintegrity.org/2015/04/10/17074/state-state-look-students-referred-law-enforcement.

²² Albright, Mandi. Metro Atlanta School Suspensions: Black Students. Tableau. Retrieved from

http://public.tableau.com/views/MetroAtlantaschoolsuspensionsBlackstudents/Dashboard1?:embed=y&:loadOrderID= 0&:display_count=yes&:showTabs=y, 2016.

revenue, loss of non-quantifiable societal contributions, and increased spending on public assistance programs.²³ High school dropouts are more than 3.5 times more likely to be incarcerated or otherwise institutionalized. Another study indicated a 70% cumulative risk of black men who dropped out of high school of being incarcerated by the time they are in their early 30s.²⁴

Given the correlations between exclusionary discipline and involvement with the justice system, along with the associated poor health, economic, and other outcomes for those involved, it is crucial to provide intervention in order to reduce the risk of these outcomes for Fulton County School students. Addressing issues at the middle school level can help prepare the students at the key transitional period of early adolescence. School attendance, community involvement, and prosocial peer interactions are all protective factors than can be promoted and facilitated with interventions that reduce OSS and provide opportunities for positive interaction and development. With support including CSP funding, the PIVOT Program can be a key component in providing students attending schools within the FCS Achievement Zone with these essential opportunities.

²³ Marchbanks, Miner P. III; Blake, Jamilia J.; Smith, Danielle; Seibert, Allison L.; Carmichael, Dottie; Booth, Eric A.; and Fabelo, Ton. "More Than a Drop in the Bucket: The Social and Economic Costs of Dropouts and Grade Retentions Associated with Exclusionary Discipline." *Journal of Applied Research on Children: Informing Policy for Children at Risk* 5, no. 2 (2014). http://digitalcommons.library.tmc.edu/childrenatrisk/vol5/iss2/17.

²⁴ Harris, B. H., Kearney, M. S., Jacome, E., & Parker, L. (2014). *Ten Economic Facts about Crime and Incarceration in the United States*. Retrieved from <u>https://www.brookings.edu/wp-</u>content/uploads/2016/06/v8 THP 10CrimeFacts.pdf

3. APPROACH AND DESIGN

Describe the specific activities and services that your program will provide and how your program will accomplish it.

<u>Program Activities</u>. The activities of the PIVOT Program will meet the program objectives of providing an alternative to exclusionary discipline and juvenile court referral, with extensive support for the student to reduce the risk of juvenile justice involvement and its correlated poor outcomes. The program activities also aim to promote a positive trajectory for individual students, as well as a cumulative effect of an improved school climate as a result of both the reduction of disruptive behavior and the acquisition of skills that facilitate prosocial interaction among students and between students and school faculty and staff.

The proposed program will take place during the 2018 calendar year in three phases:

<u>Preparation/Development</u>. Specific activities for the first phase of the program will include:

- Discussions with school administrators, behavioral specialists and staff, communicating with parent(s) or guardian(s), and recruiting program mentors and volunteers
- Discussion and assessment of student eligibility for program, which will be developed during discussion with school personnel (e.g. 1st or 2nd occurrence of Tier 2 or 3 infractions triggering potential OSS, and/or non-violent infractions, with exceptions at discretion/recommendation of school administration)
- Training for school staff, mentors, and other volunteers, with curriculum developed by the National Mentoring Resource Center of the Office of Juvenile Justice and Delinquency Prevention
- Renewing established partnerships with community programs that can offer service opportunities and positive peer group interaction. Peer groups will include well established pro-social volunteer groups facilitated by adults working on community or civic projects, and/or working on life skills development. They may include adult-facilitated groups with middle and high school students, and volunteer university student groups specifically trained for this program.
- Development of data collection and analysis tools (databases, survey instruments, etc.) for the capturing of program data for evaluation and reporting of key performance indicators (KPI's) to stakeholders

<u>Implementation</u>. Once the foundation is laid for the program to operate in McNair and Woodland Middle Schools, program activities include:

- Selection of student via school referral based on eligibility for program
- Conferences with students and parent(s) or guardian(s) to obtain consent for participation, review program activities and expectations, and provide resources
- Establishment of student and parent/guardian commitment to program as an alternative to exclusionary discipline or court referral

- Assessments, such as the Holistic Student Assessment (HSA), and placement, including a review of existing assessments for student (behavioral, learning supports, physical health, mental health), with additional screenings as necessary
- Review of infraction(s)
- Introduction of mentors and relationship development
- Establishment of focus areas and project goal, which involves students discussing interests with mentors and academic coordinators, matching complementary interest with class curriculum, and choosing a project
- Selection of a peer group that may provide the context for the project and/or assist in life skill development activities while providing prosocial exposure
- Sustaining progress of the program with regular meetings (at least twice per week) with mentor; coordination with academic advisors, teachers, and counselors as appropriate; meetings with peer group; mid-program conference with parent(s) or guardian(s); and completion of project.
- Data collection from sources such as school records, survey tools, information forms, and from in-person settings such as parent conference meetings

<u>Review</u>. Once the student completes their time in the program, the following activities will take place:

- Post assessment for student, involving an assessment of academic performance, demonstration of knowledge of life skills, and resolution of behavioral issues
- Assessment of any positive connections students have made and facilitation of how they can be maintained as part of follow up
- Debriefing conference and evaluation of experience from the perspective of the student and their parent(s) or guardian(s), including provision of links to additional support and resources, as needed
- Debriefing and evaluation with mentors, school administrators and staff, and community partners
- Data collection and evaluation

<u>Program Partnerships.</u> The PIVOT Program is establishing partnerships with several organizations and schools in collaborative efforts to address the need for alternatives to exclusionary discipline and risk of juvenile justice involvement. The primary collaborations will be with the two schools targeted by the program, Woodland Middle School, and Ronald E. McNair Middle School. Our current partnerships with other organizations can provide prosocial peer interaction while exposing the student to opportunities to build life skills and/or explore areas of interest that will aid in the completion of the required project. These organizations include:

- Girls on the Run *Heart and Sole* Program Addresses the needs of middle school girls with an evidence-based curriculum that promotes life skills, resilience, and appreciation for health and fitness. They provide opportunities for community impact through service projects.
- Emory University SEED (Student Educational Experience Development) and Paving Our Futures mentoring programs Provides students with exposure to pathways into STEM fields.

- The Youth Ensemble of Atlanta- Provides opportunities for the empowerment of youth to affect positive change in their communities through artistic expression
- Andrew and Walter Young YMCA Provides programs that promote life skills and foster personal growth for middle school students. They have long-standing programs with several Atlanta and Fulton County middle schools.
- After School All Stars Atlanta Offers homework assistance, project-based learning, and various classes and other opportunities for enrichment.

Additionally, we are partnering with the Hands-on-Atlanta schools-based AmeriCorps program for help with recruiting mentors and volunteers in the program, as well as Mirror Image Mentoring, an organization that has worked with students in a mentoring capacity while facilitating learning experiences in the Greenhouse Aquaponics program at Benjamin E. Mays High School in Atlanta. We anticipate placing students in the Clark Atlanta University TRiO Talent Search program, where they may have access to a counselor who will help provide the support needed for middle school students facing challenges to stay in school and eventually graduate from high school. We will also be working with Communities in Schools of Atlanta to establish wraparound services for Woodland and McNair students.

<u>Program Capacity.</u> The number of students that may be served by the PIVOT Program will be dependent on the number of mentors and peer organizations that have committed to the program. At a minimum, the program will be based on static partnerships with Emory University programs and students volunteering as mentors. With these partnerships, the program will be able to accommodate a minimum of ten students during an eight-week period within a semester, or about thirty students per semester. With additional mentors and program opportunities, the PIVOT Program hopes to be able to accommodate up to ninety students per semester. Parents of students who are eligible for the program may need to submit an application that will be accepted on a first-come first-served basis in cases where the program has reached near its maximum capacity.

<u>Potential Challenges and Solutions</u>. To help ensure the success of the PIVOT Program, efforts to anticipate and mitigate potential challenges have been made and will be implemented in the program as necessary. The following are examples of challenges to be considered and possible solutions:

- *Barriers to student participation.* One of the barriers may include overcoming a student's disinterest in committing to a program with a duration longer than the suspension term they would receive. To address this possibility, emphasis will be placed on benefit for the student and communication about the program will be framed in ways that provide incentive to prospective participants. Parental involvement will be another key element in ensuring student participation, not only in giving consent to participate, but remaining involved throughout their child's participation.
- *Barriers to parental involvement*. Communication with parents will emphasize their crucial role in the lives and education of their children, while providing the support and resources necessary for parents to engage with their child and those

working with them in the program. A program staff member will be designated as parent coordinator to help facilitate parental engagement.

- *Barriers for school staff involvement.* Program staff will work closely with school administration to ensure that adequate time, resources, and support are available for school staff participating in the program. This includes convenient and efficient training during the development phase, and open communication through the implementation phase of the program.
- Low participation in outcome surveys. Student and parent evaluations will be administered and collected during a required in-person program debriefing. Refreshments or other small incentive for attendance of the debriefing may be provided. Teachers with students who complete the program will be asked to complete classroom climate surveys. These surveys will be designed to be brief and simple in delivery, and PIVOT Program administrators will enlist school administration for help in encouraging their completion. The completion of evaluations will be standardized as a required program activity for mentors and others working directly with students. A member of the PIVOT Program staff will be designated for coordination of surveys and evaluations.

The PIVOT Program meets three of Fulton County's six strategic priority areas:

- 1. <u>All people are healthy</u>: Students are assessed and assisted in obtaining care for their physical and behavioral health needs
- 2. <u>All people are safe</u>: Students are in a safe, structured environment under the supervision of adults engaged in their welfare, rather than away from the school environment and unsupervised for long periods of time
- 3. <u>All people are self-sufficient</u>: Students on a potential trajectory for dependence are addressed and equipped to progress in obtaining skills, education, and opportunities that will serve them during their life course as they become self-sufficient members of society. The program specifically addresses the literacy objective in this priority area, as it works to greatly reduce the risk of students being retained and subsequently dropping out of high school. As a result of promoting a path to achieving the important milestone of graduation, other objectives of this strategic priority area, namely economic stability, housing, and food security, are also addressed.

The PIVOT Program addresses the Children and Youth Services CSP Service Category and meets the CSP funding priority for programs that address contributing factors to unhealthy behaviors in children and youth. The program works with teachers and mentors to provide continuity in academic curriculum while students are away from the classroom, and continues to work with students throughout the duration of their participation. The focused nature of the program will support comprehensive efforts to ensure that students are reading at an at 8th grade level by the time they complete middle school. The program is designed to focus on addressing root causes for student behavior and equipping and empowering them to be able to better navigate their circumstances in order to significantly decrease disruptive and delinquent behaviors for students at risk for involvement with juvenile justice system.

4. PROGRAM PERFORMANCE MEASURES

Describe the program measures/ KPI's-Key Performance Indicators are utilized to track and report program outcomes.

During the CSP contract period, several performance measures will be reported. The first will be the number of youth attending Woodland Middle School and McNair Middle School involved with or at risk for involvement with the juvenile justice system who maintain a decrease in behavioral issues (i.e. truancy, in school suspension, out of school suspension, etc.) after program implementation. This measure will be collected from student discipline data and reported in accordance with County-defined performance measures. Other agency-defined performance measures that will be included in report include:

- Number of students in program that are receiving support, and types of support, collected from student program participation data.
- Number of students referred to the justice system, collected from student discipline data.
- Baseline, semester, and yearly student discipline rates as a component of school climate, collected from student discipline data.
- Baseline and cumulative academic performance of students in the program during the program period based on class assignment and test grades and teacher feedback. Data will be collected via survey instrument designed for the program, and from student academic records.
- Evaluation data from parents of students participating in the program. Data will be collected via survey instrument designed for the program.
- Teacher reports about student behavior in classroom. Data will be collected via survey instrument designed for the program.

Program Goal	Methods	Key Performance Indicators
Enrollment and Completion of Program	All students whose infractions would result in OSS will be evaluated for eligibility. All parents will be made aware of program, and parents of eligible students will be informed of program option. Support will be provided for parents, program staff and volunteers to maintain continuity. Feedback will be solicited to address barriers to completion.	 Program enrollment rate Program completion rate Program drop-out rate Percent of program milestones met within designated timeframe

The PIVOT Program goals and methods are outlined in the following table:

Provide key contribution toward improving school climate	The program will achieve this by diverting students from exclusionary discipline into the program, thereby reducing the number of OSS and juvenile justice referrals, and implementing measures to prevent further disciplinary incidents	 Percent change in number of OSS or juvenile justice referrals per semester Rates of post-program disciplinary incidents for participating students Rates of disciplinary incidents for all students Classroom climate satisfaction rate for teachers
Provide support for student to maintain and exceed previous level of academic performance	The program will incorporate existing and newly-established academic supports, both school- based and supplementary support by program mentors and volunteers (tutors), deemed necessary after assessment. Supports will be applied to coursework and co-curricular projects completed in the duration of the program	 Number of participating students receiving newly established academic supports Percent of improvement in participating students' learning rate Grades for assignments and tests given prior and during program for participating students Post-program grades for assignments and tests for participating students
Identify and provide support for mitigating circumstances affecting student behavioral and academic performance	Students in the program will be referred to social and health services and resources as deemed necessary by previous determination and/or screenings including the Holistic Student Assessment (HAS) and other assessment tools	 Number of participating students receiving newly established supports and services from external agencies
Provide opportunity for students to benefit from intergenerational engagement	Students will be paired with an adult mentor that will seek to build rapport while facilitating program activities including academic support, project completion requirements and acquisition of necessary social and health resources	 Percent of students that report a positive experience with their adult mentor in post-program evaluations Percent of parents reporting increased engagement with child during and after program

Provide opportunity for students to benefit from prosocial peer involvement	The program will coordinate opportunities with several groups working with adolescents, primarily in STEAM related fields. Students in the program will be assisted in selecting a project to be completed at least partially in the context of interaction with these groups. The exposure is designed to promote positive peer interaction in contrast to problematic interactions that may have contributed to behavioral issues leading to infraction	 Percent of students reporting a positive experience with program peer group Percent of parents reporting a positive experience within peer group for their child Number of students that continue with peer group post-program

PROGRAM MILESTONES AND TIMELINE:

January-March 2018

- Introduction of program to school administrators, faculty, and staff
- Mentor and volunteer recruitment
- Securing of peer/project group site commitments with priority for spring/summer opportunities
- Coordinating with partners providing wraparound services and other program support
- Compiling of baseline data for performance measures and adaptation of measuring tools
- Training for school staff with focused sessions on Teacher Workday 3/9 (tentative)
- Mentor and volunteer training
- Communication with parents (via mail and email) of all students for awareness of program
- Implementation of selection of 8th grade students facing OSS, with goal of completing requirements so that start of high school is not impeded

April-May 2018

- Implementation of program activities for 8th grade students who opt in program and will continue to 9th grade in the fall
- Data collection

June-July 2018

- Completion of program and post assessments for students whose program activities extend beyond end of 2017-2018 school year and who are continuing to 9th grade in the fall
- Data collection and analysis

- Evaluation of first cohort of students and discussion with stakeholders for initial feedback (school administration, parents, community partners, mentors), including initial KPI measures
- Mentor and volunteer recruitment and training
- Securing of peer/project group site commitments for opportunities during the 2018-2019 school year
- Training for school staff and administration
- Coordinating with partners providing wraparound services and other program support

August 2018

- Communication with parents (via mail and email) of all students for awareness of program
- Program implementation for 6th, 7th, and 8th grade students

September-October 2018

- Continued program activities, with post assessments and follow up as students complete their program requirements
- Data collection and analysis
- Mid-term review of program progress with stakeholders

November-December 2018

- Continued program activities, with post assessments and follow up as students complete their program requirements
- Data collection and analysis
- Evaluation and debriefing with stakeholders, including a review of KPI's
- Mentor and volunteer recruitment and training
- Securing of additional peer/project group site commitments, as necessary, for opportunities during remainder of the 2018-2019 school year

5. CONCLUSION

High rates of exclusionary discipline continue to be a challenge for middle schools within the Fulton County Schools Achievement Zone, placing a high percentage of its students on a track where the risks are higher for involvement in the juvenile justice system, even for students who are at a lower risk for delinquent behavior. Justice-involved students are subsequently much more likely to experience poor outcomes during their life course. The PIVOT Program provides an opportunity to address disciplinary issues while reducing the risk of exposure to the justice system and its correlated negative outcomes. This program offers a solution for schools that need to address student behavior to maintain a positive school climate, while concurrently meeting their goals of reducing high rates of exclusionary discipline. Using evidence-based practices, participants in the PIVOT Program are given the opportunity to intercept problematic behavior and redirect students toward success in school at a crucial point in their academic careers by providing mentoring, social and health services, academic support, and opportunities for prosocial engagement with peers exhibiting positive behavior. Students in the program can gain perspective about their behavior while developing life skills that empower them to succeed in school and beyond, thus decreasing the chances of dropping out before completing high school.

The relevance of the PIVOT Program to Fulton County and the Fulton County Schools system is evident on several levels. As previously described, the program aligns with three of Fulton County's strategic priority areas:

- All people are healthy,
- All people are safe, and
- All people are self-sufficient.

The PIVOT Program meets the Children and Youth Services funding priority for the Community Services Program, working with middle school children toward their success in school and away from delinquent behavior and juvenile justice involvement. The program specifically aims to decrease the rate of out-of-school suspensions, one of the primary goals of the Fulton County Schools Achievement Zone initiative. The funding provided by the Community Services Program will enable the PIVOT Program to partner with Fulton County in its commitment to delivering quality community services to its residents.

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Appendix A: RFP for 2017 Community Services Program



REQUEST FOR PROPOSAL 16RFP120217A-MH

2017 Community Services Program

For

Fulton County Department of Housing and Community Development

RFP RELEASE DATE:	DECEMBER 2, 2016
PRE-PROPOSAL CONFERENCE AND	
TECHNICAL ASSISTANCE WORKSHOP:	DECEMBER 13, 14, AND 15, 2016

RFP DUE DATE (ONLINE SUBMISSION DEADLINE): JANUARY 9, 2017 AT 3:00PM

PURCHASING CONTACT: MARK HAWKS

EMAIL: Mark.Hawks@fultoncountyga.gov

For technical difficulties/ questions specific to navigating WebGrants online application system, email <u>HSD.Applications@fultoncountyga.gov</u> and cc: <u>Mark.Hawks@Fultoncountyga.gov</u>

The official process for completing the Community Services Program RFP is through the use of the Fulton County WebGrants online system. To access the on-line RFP please visit: http://fultoncountyga.gov/WebGrants

This manual is to be used *only as a reference guide* when completing the on-line RFP.

"If you need reasonable modifications due to a disability, including communications in an alternate format, please contact the Purchasing Department's Disability Compliance Liaison Rholanda Stanberry, Contract Compliance Administrator at 404-612-6304 or email: rholanda.stanberry@fultoncountyga.gov. For Georgia Relay Service Access, dial 711."

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Fulton County Board of Commissioners



Fulton County operates under the commission-county manager form of government. This system combines the policy leadership of elected officials with the administrative abilities of a county manager. The commission meets in regular session twice a month on the first Wednesday (10 a.m.) and the third Wednesday (10 a.m.). Tune in to Fulton County's government access channel, FGTV, for live coverage.

141 Pryor Street SW, 10th Floor Atlanta, GA 30303 404-612-8200

http://www.fultoncountyga.gov/commissioners

Fulton County Government and Strategic Priority Areas

Fulton County Government Vision: Fulton County is a positive, diverse community with a thriving economy, safe neighborhoods, healthy residents, and a rich quality of life that all people can enjoy. It is served by a County government that is recognized for being innovative, effective, efficient, and trustworthy.

Fulton County Government Mission: To deliver efficient, high-impact service to every resident and visitor of Fulton County.

Fulton County Government Strategic Priority Areas: In order to accomplish our mission and work toward our vision, the Board of Commissioners organized the County's efforts into six Strategic Priority Areas that reflect the major goals of Fulton County government.

- 1. All people are healthy;
- 2. All people are safe;
- 3. All people are self-sufficient;
- 4. All people have economic opportunities;
- 5. All people are culturally and recreationally enriched;
- 6. All people trust government is efficient, effective and fiscally sound.

For more information regarding Fulton County's strategic priorities, to include the 2016-2019 Strategic Plan, and the 2016 Environmental Scan, visit <u>http://www.fultoncountyga.gov/strategyandperformance</u>.

Strategic Priority Area: "All People are Self-Sufficient": For most adults and families, selfsufficiency means being able to meet their basic needs with minimal public assistance or private assistance. However, we acknowledge that there are times at which families and individuals will find themselves in a vulnerable situation and lose their ability to be self-sufficient. It is Fulton County's responsibility to connect our residents to the right resources at the right time to ensure these periods of dependency are rare, brief, and non-recurring. For those most vulnerable in our society, seniors and intellectually and developmentally disabled (IDD) persons, self-sufficiency means being able to age in place and avoid institutionalization. Fulton County is responsible for providing a safe space where our most vulnerable populations can receive the care and community support they need.

"All People are Self-Sufficient" Program Objectives:

Economic Stability: Fewer residents live in poverty [More residents are economically self-sufficient]

Housing: Residents have better access to affordable housing

Literacy: More residents know how to read and achieve a high school diploma on time

Food: Fewer residents experience hunger

Independence: More vulnerable residents maintain their independence

"All People are Self-Sufficient" Key Performance Indicators: Economic Stability:

- Percentage of individuals and families who earn a living wage
- Percentage of individuals and families who receive mainstream social benefits

Housing:

- Percentage of individuals and families who live in unaffordable housing and do not have access to housing in their price range
- Homelessness rate
- Length of homelessness experience

Literacy:

- Percentage of public school students within Fulton County who are reading at grade level in 3rd, 5th, and 8th grade
- Percentage of residents ages 16 and older who are literate according to National Assessment of Literacy Standards
- Percentage of public school students within Fulton County that graduate high school on time

Food:

 Percentage of individuals and families who report going a whole day during a week without food because there was not enough money for food

Independence:

- Percentage of seniors living independently or with family
- Percentage of intellectually and developmentally disabled persons living independently or with family

Fulton County Government assures the provision of quality community services to all citizens of Fulton County. This includes citizens who are residents of municipalities within the county.

This remarkable task is accomplished in large part by contractual arrangements with nonprofit agencies. The nonprofit community is a vast network of agencies that deliver a continuum of services to general and special populations. Nonprofit organizations play a pivotal role in service delivery, because they are generally community based and community focused entities. Fulton County relies heavily on the nonprofit community to bridge the gaps in the Fulton County Community services delivery system.

In that regard, Fulton County seeks to create new partnerships as well as nurture the partnerships we have historically maintained with the nonprofit community through our grant programs.

The Community Services Program (CSP) is the County's principal avenue for funding social services programs pursuant to the County's Strategic Plan. As part of Fulton County's commitment to ensuring the self-sufficiency of the people of Fulton County, a number of specific objectives and related key performance indicators have been established as a way to measure our success over time.

The Fulton County Board of Commission executes legal contracts between Fulton County and nonprofit agencies selected through a competitive RFP process. The County will issue a Request for Proposal (RFP) for the Community Services program (CSP) on an annual basis pending funding availability. Under the RFP, the County will allocate funds to eligible, non-profit 501(c)3 service providers submitting successful proposals. To be considered, Proposers must submit a complete response as outlined in the actual RFP that is released. Proposer's responses must include the appropriate and requested information in sufficient detail to demonstrate the Proposer's knowledge, skills and abilities to provide the requested services.

Date	Action
December 2, 2016	2017 Community Services Program (CSP) RFP released. Public notice of available funds, RFP guidelines, and process.
December 13, 14, 15, 2016	Pre-Proposal Conference and Technical Assistance Workshop
December 29, 2016	Last Day for questions to be submitted to Fulton County Purchasing, 11:00 a.m.
January 9, 2017	RFP Deadline, 3:00 pm - Submission of RFP and attachments via the Fulton County WebGrants online application system. Hard Copy applications <u>will not</u> be accepted.
January 10-13, 2017	Fulton County staff review RFPs for initial eligibility.
January 17-31, 2017	CSP Evaluation Committee review and recommendation process.
February 15, 2017	Recommendations presented to the Fulton County Board of Commissioners for approval.
February 16, 2017	Pending final action by BOC, a Notification to Proceed (NTP) will be sent to vendors with instructions for modifying the original proposal based on the funding award; notification of pre-payment site visit/onsite agency T.A. session.
February 17-21, 2017	Vendors review and make modifications to applicable sections of the original proposal via Fulton County WebGrants.
February 28-March 31, 2017	Contract development and signature process (Vendor, Housing and Community Development Director, County Attorney, County Clerk and County Commission Chair).
March 6-24, 2017	Office of Grants and Community Partnerships staff conducts pre-payment site visit/onsite agency T.A. session with 2017 CSP funded vendors.
April 3-April 7, 2017	Vendors submit invoice for services rendered and projected deliverables January 1, 2017 -June 30, 2017. (Authorization of payment is dependent upon a fully executed contract and an acceptable pre-payment site visit.)
May 2017	Payment disbursed to vendors for services rendered and projected deliverables January 1, 2017 – June 30, 2017.
July 2017 - October 2017	CSP program site visits.
July 14, 2017	Performance Report due via Fulton County WebGrants for services rendered January 1, 2017 – June 30, 2017.
October 13, 2017	Performance Report due via Fulton County WebGrants for services rendered July 1, 2017 – September 30, 2017.
October 16-20, 2017	Vendors submit invoice for services rendered July 1, 2017-September 30, 2017, with projected deliverables October 1, 2017-December 31, 2017. (Authorization of payment is dependent upon an acceptable performance report and site visit.)
November, 2017	Payment disbursed to vendors for services rendered July 1, 2017-September 30, 2017, with projected deliverables October 1, 2017-December 31, 2017.
December 31, 2017	2017 CSP Contract concludes.
January 12, 2018	Performance Report due via Fulton County WebGrants for services rendered October 1, 2017 – December 31, 2017.

Timeline for 2017 Community Services Program

Pre-Proposal Conferences and Technical Assistance Workshops for the Community Services Program

North Fulton	
Tuesday, December 13, 2016	
10:00 a.m 12:00 p.m.	
North Fulton Service Center	
7741 Roswell Road, Room 232	
Sandy Springs, GA 30350	
Central Fulton	
Wednesday, December 14, 2016	
2:00 p.m 4:00 p.m.	
Metropolitan Branch Library	
1332 Metropolitan Parkway	
Atlanta, GA 30310	
South Fulton	
Thursday, December 15, 2016	
10:00 a.m 12:00 p.m.	
South Fulton Service Center	
5600 Stonewall Tell Rd.	
Auditorium-Room 215	
College Park, GA 30349	

Please RSVP for a T. A. workshop by e-mailing: hsd.applications@fultoncountyga.gov

NO CONTACT DURING PROCUREMENT PROCESS:

It is the policy of Fulton County that the evaluation and award process for County contracts shall be free from both actual and perceived impropriety, and that contacts between potential vendors and County officials, elected officials and staff regarding pending awards of County contracts shall be prohibited.

- A. No person, firm, or business entity, however situated or composed, obtaining a copy of or responding to this solicitation, shall initiate or continue any verbal or written communication regarding this solicitation with any County officer, elected official, employee, or designated County representative, between the date of the issuance of this solicitation and the date of the County Manager's recommendation to the Board of Commissioners for award of the subject contract, except as may otherwise be specifically authorized and permitted by the terms and conditions of this solicitation.
- B. All verbal and written communications initiated by such person, firm, or entity regarding this solicitation, if same are authorized and permitted by the terms and conditions of this solicitation, shall be directed to the Purchasing Agent.
- C. Any violation of this prohibition of the initiation or continuation of verbal or written communications with County officers, elected officials, employees, or designated County representatives shall result in a written finding by the Purchasing Agent that the submitted bid or proposal of the person, firm, or entity in violation is "non-responsive", and same shall not be considered for award.

The ordinance is in effect as of the submittal deadline. The provisions of this Ordinance shall not apply to oral communications at any public proceeding, including Pre-Proposal Conferences, oral presentations/interviews before an Evaluation committee, and contract negotiations during any public meeting. Provisions of the ordinance shall terminate at the time that the BOC awards or approves a contract, rejects all proposals or otherwise takes action which ends the solicitation process.

CLARIFICATION AND ADDENDA:

Proposers may submit requests for clarifications or interpretations regarding this RFP. Proposers must prepare such requests in writing for the County's consideration as set forth in this section of this RFP. While the County has not placed an initial limitation on the number of requests which can be submitted, Proposers are cautioned that if Proposers do not request meaningful clarifications or interpretations in an organized manner (e.g., limited frequency of requests), the County will set restrictions on the frequency and number of requests permitted. The County will not respond to requests, oral or written, received after **December 30, 2016 at 11:00am**, local prevailing time. Proposers are advised that this section places no obligation on the part of the County to respond to any or all requests for clarification or interpretation, and that the County's failure to respond to any such request will not relieve the Proposer of any obligations or conditions required by this RFP.

CONTACT PERSON AND INQUIRIES:

Any questions or suggestions regarding this RFP shall be submitted in writing to the Purchasing Department contact person, **Mark Hawks**, <u>Mark.Hawks@Fultoncountyga.gov</u> or fax # 404-335-5040. Any response made by the County shall be provided in writing to all Proposers by addendum. No verbal responses shall be authoritative. The County will not respond to requests, oral or written, received after December 29, 2016 at 11:00am.

Technical difficulties/ questions that are specific to navigating the Fulton County WebGrants online application system should be sent to <u>HSD.Applications@fultoncountyga.gov</u>. Questions that are specific to the CSP RFP **must be submitted** to the Purchasing Department contact person Mark Hawks.

Fulton County does not discriminate on the basis of disability in the admission or access to its programs or activities. Any requests for reasonable accommodations required by individuals to fully participate in any open meeting, program or activity of Fulton County Government should be directed to Rholanda Stanberry, Contract Compliance Administrator at 404-612-6304 or email: rholanda.stanberry@fultoncountyga.gov.

In accordance with the provisions of the ADA, this document can be requested in an alternate format. If you need reasonable modifications due to a disability, including communications in an alternate format, please contact the Purchasing Department's Disability Compliance Liaison Rholanda Stanberry 404-612-6304, seven days in advance to facilitate your request. For TDD/TTY or Georgia Relay Service Access, Dial 711.

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2017 Community Services Program RFP Eligibility Requirements

These items are applicable for the 2017 Funding Cycle (January 1, 2017 - December 31, 2017). Please verify that the RFP is complete by reviewing the following RFP eligibility requirements and ensuring that all attachments are uploaded to Fulton County WebGrants.

<u>Completed and Submitted RFP via Fulton County WebGrants online application</u> system on or before the Application deadline

1. □ Letter from the Internal Revenue Service

Letter from the Internal Revenue Service recognizing the agency/applicant as tax exempt and nonprofit, under Section 501 (c) 3 of the Internal Revenue Code. Agency and 501 (c) 3 status must be in existence for at least one (1) year.

2.
articles of Incorporation and Amendments from the Georgia Secretary of State
A copy of the agency's Articles of Incorporation (including agency/program's mission), and
Amendments from the Georgia Secretary of State.

3. List of Agency Board Members

A list of all active Agency Board Members.

Agency/Program organizational chart indicating all major components of agency/program.

Submit a recent copy of the agency/program audit (within the past three years) conducted by a Certified Public Accountant. Eligible audits must be for fiscal year review periods between January 1, 2014, and December 31, 2016 and must contain at least one full year (12 months) of financial records within the review periods. This must be a full, signed audit that includes an Independent Auditor's Report expressing an opinion regarding all pertinent material aspects of the agency's finances. (Independent is defined as a third party auditor submitting a report on the auditing agency's letterhead.) Note: Financial Statements or Reports ARE NOT considered full audits and will not be accepted.

Or

Recent agency/program Financial statements

Submit a recent copy of the agency/program financial statements containing at least one full year (12 months) of financial records between January 1, 2014, and December 31, 2016.

6. CSP Funding Parameters

Requested funding amount falls within the defined funding parameters: request is at or above the minimum \$25,000 threshold per agency and proposal, and below the maximum \$100,000 threshold per agency and proposal. *Note: The maximum amount of HCD-CSP funds allowed for administrative purposes is 5% of funds awarded, which is inclusive of direct and indirect charges for administration of the grant.*

Operational Specifications:

- The maximum Community Services funding award for each agency and proposal is \$100,000.
- The minimum Community Services funding award for each agency and proposal is \$25,000.
- The maximum amount of funds allowed for administrative purposes is 5%.
- Community Services funds must be used to support Fulton County residents only.
- All programs must be accessible to all Fulton County residents regardless of ability to pay.
- Agency must be able to report the Fulton County Commission District in which all program participants reside.
- The proposed project must take place in a facility that is accessible under Americans with Disabilities Act (ADA) guidelines. For more information or technical assistance, call the Fulton County Office of Diversity and Civil Rights Compliance (DCRC), 404-612-7390.
- All contracts will operate between January 1, December 31 of the funding year indicated in the RFP.

Characteristics of Programs to be Funded:

- Results-Driven: program focuses on improving the conditions of well-being of participants with a tracking system in place to measure the program's impact.
- Evidence-based Practice: program has a significant level of quantitative and qualitative data showing positive outcomes.
- Innovative: program addresses gaps in current systems, tests new approaches, or uses creative strategies to address unmet needs.
- Collaborative: agency partners with one or more organizations to achieve mutual intended outcomes. Two or more local communities/non-profits working in support of a single or collaborative project.
- Systemic Approach: program engages in policy analysis and action that enables us to identify and influence the key root causes of issues negatively impacting Fulton County's residents.

Ineligible Proposals:

Proposals will be DEEMED INELIGIBLE for the following reasons:

- Not more than 5% of requested or awarded grant funds may be applied towards administrative costs of the program. Includes direct and indirect charges for administration of the grant.
- Construction projects, renovations, repairs, remodeling of existing buildings, or land acquisitions will not be funded (This does not apply for the Senior Home Modification projects, or renovations/repairs).
- Agencies whose activities are restricted to its membership.
- College / University projects which are not open to the public and do not serve a significant (50%) non-student population.
- Government agencies; Agencies that serve as funding sources to 501(c)3 organizations.
- Projects of a religious nature.
- Scholarships to public / private educational institutions.
- Deficit Reduction.
- Capital expenditures (resources not completely consumed during the contract year i.e. computers, construction, vehicles, cell phones, etc.). Program materials that may be pertinent to the scope of services of a funded program and that aid in grantee meeting contracted program outcomes are excluded from capital expenditure definition (i.e. children's story books, educational materials, games, puzzles, and flash cards).

Review Process and Evaluation Criteria:

The review and scoring of CSP proposals consists of four (4) components:

- 1. Eligibility Review
- 2. Internal and External Evaluation Committee Review
- 3. Funding Allocation Protocol
- 4. Final Review and action by the Fulton County Board of Commissioners

Eligibility Review is the initial screening phase of the submitted Community Services Proposals. The eligibility review is initiated by the Purchasing Department who ensures the proper and timely submission of the proposals by the deadline. The eligibility review continues with the Department of Housing and Community Development who ensures that the proposals include the required information as outlined in the RFP. The contents of each proposal submitted via WebGrants are reviewed to assure that the required documentation was uploaded and meets the initial eligibility requirement. If a submitted proposal is missing any of the required documentation, then the proposal is not forwarded for further review. Proposals that comply with submittal criteria and content requirements will be forwarded to the CSP Evaluation Committee for review and scoring. The criteria for meeting eligibility requirements are posted in the Community Services Program RFP Instruction Manual.

The Community Services Evaluation Committee is comprised of twenty (20) committee members, of which ten (10) are internal County staff and ten (10) are external "subject matter experts". Additional reviewers are activated should the number of proposals submitted exceeds the capacity of the CSP Evaluation Committee. Fulton County Department Directors/Division Managers, whose program(s) align with the five CSP Service Categories (Children and Youth Services, Disabilities, Economic Stability/Poverty, Homelessness, and Senior Services) assigns staff to serve as internal committee members and recommends "subject matter experts" to serve as external reviewers. External reviewers complete a questionnaire outlining their areas of skills and expertise, and are required to complete a confidentiality agreement, and a conflict of interest agreement prior to review of proposals. Proposals will be categorized based on the primary Service Category indicated by the vendor. Each proposal will receive two (2) reviews and two (2) scores to minimize any potential bias from a single reviewer.

Proposals will be evaluated on the following criteria:

- Executive Summary (12 pts)
- Citizen Needs (15 pts)
- Approach and Design (15 pts)
- Program Performance Measures (15pts)
- Budget (15 pts)
- Organization Information (3 pts)
- Available Resources and Sustainability (12pts)
- General Attributes (6pts)
- Conclusion (6pts)
- Bonus (1pt)- Submitting RFP at least one day prior to the deadline

Funding Allocation Protocol

The Funding Allocation Protocol is an administrative task performed at the third stage of review. Each proposal will receive a total score, which are the summed internal and external reviewer scores. If there is a 20 point differential in the internal and external reviewer scores, and that difference significantly impacts the outcome of the rating, the internal and external reviewer will be asked to confer regarding the disparity in scores. The recommended funding amount is determined using the percentage of total points the RFP received and applying that same percentage to the vendor's funding request. Requested funding amounts must be supported in the submitted proposal and fall within the defined funding parameters (i.e. minimum request \$25,000; maximum request \$100,000; 5% Admin maximum, etc.). Proposals that do not fall within the established funding parameters will be deemed ineligible. Requested amounts that are not supported by the submitted proposal will be subject to reductions. The funding allocation protocol will be used to help guide funding recommendations based on the grant budget, individual proposal requests and proposal scores. Based on the availability of CSP funding allocated in the respective budget year, proposals that score high in their primary service category, will have a greater likelihood of being recommended for funding. The score driven funding package is reviewed to certify that it collectively addresses the objectives and desired outcomes outlined in the five CSP service categories.

The Fulton County Board of Commissioners (BOC) receives the proposed funding package for review and final action.

Implementation Process:

Contract for Services

The Contract Year shall be January 1– December 31 of the funding year indicated in the RFP. Contracts for services to be rendered under the Community Services Program shall be between the responsible vendor (primary agency) and Fulton County Government. Vendors will be informed of the contract signing period. Contracts must be signed by the agency's authorized representative. Failure to submit requested information and signed contracts in accordance with the established procedures will void funding awards. All unspent funding must be returned to Fulton County Government.

Funding Disbursements

CSP funding is reimbursable, and will be dispersed through the County's vendor payment process. Disbursement of funds will be contingent upon providers being in compliance with the terms of their contract.

Record Retention

Each vendor receiving funding from Fulton County is required to keep detailed records on how Fulton County funds were spent, a copy of the executed contract, and any additional information pertaining to the program for a minimum of three years.

Fulton County Internal Audit

Fulton County may call for an audit of the Community Services Program. Agencies that receive audits are selected by the Fulton County Internal Audit Division.

Reporting Requirements

Each agency is required to submit performance reports and required supportive documentation. The performance report is a performance measurement tool administered to assist with monitoring program performance and contract compliance. Report due dates will be specified in the CSP contract. Funded agencies will receive guidelines for reporting. Failure to adhere to the program report requirements will delay additional payments on a contract and gives cause to reject a request for continuation of funds.

Program Monitoring

Staff from the Department of Housing and Community Development will conduct agency/ program site visits to monitor the contract compliance of operations, programming and services.

Failure to adhere to prescribed procedures, to perform contractual services or to submit reporting or audit requirements may result in the termination of the contract, and reimbursement of funds.

Community Services Program (CSP):

The CSP program is the County's principal avenue for funding social services programs pursuant to the County's Strategic Plan. As part of Fulton County's commitment to ensuring the self-sufficiency of the people of Fulton County, a number of specific objectives and related key performance indicators have been established as a way to measure our success over time.

CSP Service Categories:

CSP addresses five (5) Service Categories: Children & Youth Services, Disabilities, Economic Stability/Poverty, Homelessness, and Senior Services.

- 1. Children & Youth Services Programs and services in this category should address outcomes and performance measures that result in: (1) Every child being prepared to succeed in kindergarten. This includes but is not limited to early intervention services, early childhood development programs such as Head Start and Child welfare programs and child abuse and sexual abuse prevention; (2) Every child receiving support in and out of school. Programs and services should include innovative curriculums and methods that develop and improve 3rd, 5th and 8th grade ELA and Math proficiency, enhance literacy, increase intergenerational engagement, reduce school suspension referrals and provide foster care and/or adoption assistance; (3) youth and young adults becoming self-sufficient and positive contributors to society. Programs and services in this category should support the development and independence of intellectually and developmentally disabled (IDD) persons, improve employability or lead to increased success in becoming employed, impact contributing factors that lead to unhealthy behavior including but not limited to teen parenting, youth violence, truancy, substance abuse, bullying and cyberbullying, self-harm, youth homelessness and the student mobility rate.
- 2. Disabilities Programs and services in this category should address outcomes and performance measures that help children and adults with disabilities, inclusive of developmental disabilities, achieve their personal goals for independent living, which may include: Participating in their choice of facility-based education and vocational training activities; participating in job coaching and related services that will lead to supported employment, as well as preparing for independent living in a community (rather than an institutional) setting.
- 3. Economic Stability/Poverty Programs and services in this category should address outcomes and performance measures that demonstrate positive change toward self-sufficiency, improved living conditions, increased disposable income and/or quality of life for individuals or families experiencing 'hardships' due to the economy and are at or below 200% of the poverty level as indicated by the Federal Poverty Guidelines. http://dch.georgia.gov/sites/dch.georgia.gov/files/2016 Federal Poverty Guidelines.pdf

4. **Homelessness** - Programs and services in this category should address outcomes and performance measures that demonstrate positive change toward the County's goal of ending homelessness, assisting runaways and/or the victims of domestic violence. This could include: Community-based

runaway and domestic violence services; identifying and improving service quality and performance.

5. Senior Services - Program and services in this category should be specific to home and communitybased services that yield, but are not limited to the following outcomes for seniors (active adults) and/or their caregivers with the greatest economic and social needs: seniors (active adults) live independently in their own homes without social isolation; seniors (active adults) with Alzheimer's disease or related disorders and their caregivers experience a positive quality of life; and seniors (active adults) experience improved health outcomes.

CSP Funding Priorities:

Respondents to the RFP will be required to propose programming and services that address a minimum of one CSP funding priority that align with the primary service category for which funding is being requested.

Children & Youth Services Funding Priorities:

- 1. Kindergarten readiness (and early childhood development ages 3-5 years)
- 2. English Language Arts Standards (ELA), Math and Science proficiency
- Contributing factors to unhealthy behaviors in children and youth: (Truancy; Student mobility and homelessness; Sexual activity and drug abuse; Eating disorders; Cyberbullying and bullying; Juvenile Crimes; Violence in media and culture; Internet and social media addiction)

Disabilities Funding Priorities:

- 1. After school, weekend, summer programs, and family caregiver supports and services for persons with Intellectual and Developmental Disabilities
- Programs that promote educational (youth with disabilities) and/or vocational and Career Readiness skills (adults with disabilities); programs that support teaching work skills, interpersonal communication, customer relations skills, and opportunities which could lead to greater selfsufficiency
- Social and cultural programs for persons with Developmental Disabilities to decrease isolation and promote social interaction and development of interpersonal and emotional skills. Programs which promote wellness for the special needs of Persons with Disabilities exclusive of their specific disability

Economic Stability/Poverty Funding Priorities:

- 1. Emergency Financial Assistance inclusive of Rental and Mortgage assistance, as well as Utility assistance
- Pre-vocational and Introductory Computer Training. Training/Job Development/Employment which leads to self-sufficiency. Ex-offender support services (employment, housing options and transitional skills training)
- 3. Accessibility to mass transit or other forms of transportation and Mobility to and from the work place or place of employment

Homelessness Funding Priorities:

- 1. Supportive housing options for homeless youth, women fleeing domestic violence, families, women with children and unattached adults
- 2. Vocational & academic skills upgrade and job placement services targeting the unemployed and under employed (working poor)
- 3. Affordable, accessible and safe licensed 24/7 child care services

Senior Services Funding Priorities:

- 1. To enhance long-term services and supports for seniors and their caregivers that enable older adults to remain in the community and age-in-place
- 2. To improve better health outcomes for older adults
- 3. To connect citizens with organizations to effectively address older adult food hunger

CSP County Defined Performance Measures:

Respondents to the RFP will be required to select and report on a minimum of one County defined performance measure throughout the contract period, in addition to reporting on a minimum of one agency defined performance measure. The CSP performance measure(s) selected must align with the primary service category for which funding is being requested.

Children & Youth Services County defined performance measures:

- Number of students assessed as ready for kindergarten
- Number of public school students who are reading at grade level in 3rd, 5th, and 8th grade
- Number of public school students who are proficient in math at grade level 3 and 5
- Number of youth involved with or at risk for involvement with the Juvenile Justice System who demonstrate decreased or no delinquent behaviors (i.e. truancy, in school suspension, out of school suspension, etc.)

Disabilities County defined performance measures:

- Number of Persons with Disabilities (PWD) included in programs due to increased accessibility; physical environment, transportation, housing, alternative communications
- Number of Persons with Disabilities who are self-sufficient or able to live independently because they can achieve the necessary training or education to be employed or, be able to achieve comparable salaries as those without disabilities
- Number of Persons with Disabilities who can focus on overall wellness, including better management of their disability

Economic Stability/Poverty County defined performance measures:

- Number of individuals who entered employment/education/training
- Number of individuals and families who earn a living wage
- Number of individuals who gain increase in wages and/or attainment of credential in post-secondary training

Homelessness County defined performance measures:

- Number of individuals who are stable in supportive housing followed by uninterrupted movement into affordable permanent housing
- Number of individuals with sustained positive income (earned/unearned) that supports selfsufficiency
- Number of individuals whose barriers to self-sufficiency are eliminated/ reduced; paths to self-sufficiency created

Senior Services County defined performance measures:

- Number of older adults who experience better outcomes based on the services they receive
- Number of seniors who report or demonstrate improved or maintained optimal health
- Number of seniors who report no indications of food-access problems or limitations

Community Services Program Request for Proposals (RFP)

The official process for completing the Community Services Program RFP is through the use the Fulton County WebGrants online system. To access the on-line RFP please visit: http://fultoncountyga.gov/WebGrants. This instruction manual is to be used only as a reference guide when completing the on-line RFP.

Cover Page/ Contact Information:

Agency Name:

Agency EIN-Number as assigned by The Internal Revenue Service (IRS): ______

Fulton County Vendor Code Number (Note: Only for agencies who are currently funded or have received previous funding from Fulton County Government): ______

Agency Main Address (to be listed in the Community Services Program Directory):_____

Agency Main Number/ Fax/ Website/ E-mail Address: ______

Board Chair: ______Board Chair Telephone # : _______ 2nd Authorizing Official: ______ 2nd Authorizing Official Telephone #:

RFP / Program Contact: _____ RFP / Program Contact Telephone # / Email Address: _____

Alternate RFP / Program Contact: ______ Alternate RFP / Program Contact Telephone # / Email Address: ______

General Agency Information:

- 1. Describe the purpose of your agency and the services that your agency provides.
 - (This information will be used to present a snapshot of your agency to the Board of County Commissioners and Fulton County publications.)
- 2. State the total number of clients that your agency serves annually.
- 3. State the total number of Fulton County clients that your agency serves annually.
- 4. State the approximate number of <u>Fulton County</u> clients that your agency serves annually that live at or below the poverty level.
- 4a. State the data source that your agency uses to determine the number of clients that live at or below the poverty level. (Family income; Family receives TANF; Family receives Food Stamps; Family receives Medicaid; Family receives S.S.I.; Family receives PeachCare for Children; Other)

General Program Information:

- 5. State the name/title of the program for which your organization is requesting CSP funding.
- 6. Select the primary CSP Service category that your program is requesting CSP funding to address. (Select only 1 primary service category)

Children & Youth Services	Disabilities	
Homelessness	Seniors	

- Economic Stability/Poverty
- 7. Select ADDITIONAL CSP Service categories that your program will address with CSP funding. (Select all additional categories that are applicable)

Children & Youth Services	Disabilities	
Homelessness	Seniors	

- Economic Stability/PovertyNot Applicable
- State the amount of CSP funding that your agency is requesting to support your program (January 1, 2017- December 31, 2017). (Funding minimum is \$25,000 per agency and proposal; funding maximum is \$100,000 per agency and proposal, Admin maximum is 5% per agency and proposal).
- 9. Select the CSP funding priority(ies) that your program will address. (Reference CSP priorities on page 14.)
- **10.** Select the County defined performance measure(s) that your agency will track. (*Reference CSP* performance measures on page 15.)
- 11. List the service delivery site(s) / address(es) for the program in which you are seeking funds.

Program Location (complete physical address)	Fulton County District of the program (facility) location	District(s) of Fulton County Residents Served by each program (facility) location
EX: ABC Elem. School, 123 ABC St. NW Atlanta, GA 30004	123456	123456
	123456	123456
	123456	123456

Community Services Program RFP Evaluation Criteria:

Proposer's responses must include the appropriate and requested information in sufficient detail to demonstrate the Proposer's knowledge, skills and abilities to provide the requested services and will be reviewed and evaluated based on each Proposer's responses.

12. Executive Summary (Maximum points for section is 12 out of 100)

Provide an Executive Summary (Overview) of the program.

(Excellent)	1. Purpose of the program is clear and thorough. (3 points)
3 points per criteria met	2. Provides a summary of all methods used, results to be obtained and requires
for a total of 12 points	less than 30% of grant funding to meet the annual budget. (3 points)
	3. Provides history of past grant performance with Fulton County Government
	and performance metrics for the last 10 years that demonstrates significant
	impact. (3 points)
	4. Conclusion is strong and reiterates the goal behind the plan. (3 points)
(Fair)	1. Purpose of the program is somewhat clear and has a few areas that need
2 points per criteria met	additional supporting research. (2 points)
for a total of 8 points	2. Provides some of the methods used, results to be obtained and requires 31 to
	50% of grant funding to meet the annual budget. (2 points)
	3. Provides history of past grant performance with Fulton County Government
	and a performance metric that shows impact for five or more years. (2 points)
	4. Conclusion is a summary of the procedures used and needs a more specific
	goal. (2 points)
(Poor)	1. Purpose of the program is unclear and incomplete. (1 point)
1 point per criteria met	2. Provides a vague listing of methods used, has no information on the results to
for a total of 4 points	be obtained, and budget requires more than 50% of funding to meet the
	annual goal. (1 point)
	3. Provides history of past grant performance with Fulton County Government
	and a performance metric that shows impact for less than five years. (1 point)
	4. Conclusion is weak and does not site a specific goal for the project. (1 point)

13. Citizen Needs (Maximum points for section is 15 out of 100)

 Describe the need (or problem) in Fulton County that you are proposing to address with CSP funding.

(Excellent)	1. Identifies and describes the specific need adequately. (3 points)	
3 points per criteria met	2. Describes the underserved population service area. (3 points)	
for a total of 15 points	 Identifies how many Fulton County residents will be served by gender, race, age, income, and County Commission District. (3 points) 	
	4. Describes how proposed project will assist and impact the target population. (3 points)	
	5. Provides statistics (federal, state, and or local) for the need or problem that the program is proposing to address. (3 points)	
(Fair)	1. Specific need is partially identified. (2 points)	
2 points per criteria met	2. Population service area is partially identified. (2 points)	
for a total of 10 points	 Identifies how many Fulton County residents will be served by only two of the five variables (gender, race, age, income or County Commission District). (2 points) 	
	 Proposal has some strong points, but lacks specifics on meeting the need of the target population. (2 points) 	
	 Provides general statistics (not based on actual federal, state, or local data) for the need or problem that the program is proposing to address. (2 points) 	

(Poor)	1. Provides a vague description of the specific need to be addressed. (1 point)
1 point per criteria met	2. Provides a vague description of the population service area. (1 point)
for a total of 5 points	 Identifies how many Fulton County residents will be served, but does not include the five variables (gender, race, age, income and County Commission District). (1 point)
	4. Information provided on meeting the needs of target population is weak. (1 point)
	5. Statistics provided are not related to the need or problem that the program is proposing to address. (1 point)

14. Approach and Design (Maximum points for section is 15 out of 100)

 Describe the specific activities and services that your program provide and how your program will accomplish it.

11	
(Excellent)	1. Identifies the activities and services that will be provided. (3 points)
3 points per criteria met	2. Identifies how the activities and services will be accomplished. (3 points)
for a total of 15 points	3. Proposal addresses three Fulton County "All People are Self-Sufficient"
	strategic priority area program objectives. (ref. page 3 of CSP instruction
	manual) (3 points)
	4. Proposal addresses three CSP funding priorities as identified by the primary
	service category selected. (3 points)
	5. Provides more than seven instances of community collaborative relationships
	to assist organization in addressing the need. (3 points)
(Fair)	1. Partially identifies the activities and services that will be provided. (2 points)
2 points per criteria met	2. Partially identifies how the activities and services will be accomplished. (2
for a total of 10 points	points)
	3. Proposal addresses two Fulton County "All People are Self-Sufficient" strategic
	priority area program objectives. (2 points)
	4. Proposal addresses two CSP funding priorities as identified by the primary
	service category selected. (2 points)
	5. Provides 4-7 instances of supporting community collaborative relationships to
	assist organization in addressing the need. (2 points)
(Poor)	1. Provides a vague description of the activities and services to be provided. (1
1 point per criteria met	point)
for a total of 5 points	2. Provides a vague description of how the activities and services will be
	accomplished. (1 point)
	3. Proposal addresses one Fulton County "All People are Self-Sufficient" strategic
	priority area program objectives. (1 point)
	4. Proposal addresses one CSP funding priority as identified by the primary service
	category selected. (1 point)
	5. Provides less than four instances of supporting community collaborative
	relationships to assist organization in addressing the need. (1 point)

15. Program Performance Measures (*Maximum points for section is 15 out of 100***)**

Describe the program measures/ KPI's-Key Performance Indicators are utilized to track and report program outcomes.

(Excellent)	1. Provides a clear explanation of the methods to be used and the specific goals to
3 points per criteria met	be obtained. (3 points)
for a total of 15 points	2. Describes the major milestones to be achieved with a supporting schedule. (3
070	points)
	3. Identifies the specific data collection tool(s)/ source(s) used to report progress
	on performance measures. (3 points)

	4. Vendor selects three County defined performance measures to report on
	during the contract period. (3 points)
	5. Vendor provides three Agency defined performance measures to report on
	during the contract period. (3 points)
(Fair)	1. Provides a clear explanation for some of the methods used and the majority of
2 points per criteria met	goals for the project. (2 points)
for a total of 10 points	 Describes the majority of the milestones for the project with a supporting schedule. (2 points)
	 Provides a general description of data collection tool(s)/ source(s) used to report progress on performance measures. (2 points)
	4. Vendor selects two County defined performance measures to report on during the contract period. (2 points)
	5. Vendor provides two Agency defined performance measures to report on
	during the contract period. (2 points)
(Poor)	1. Provides a vague description of the methods to be used and goals to be
1 point per criteria met	obtained. (1 point)
for a total of 5 points	Describes only a few of the major milestones for the project and does not include supporting schedule. (1 point)
	 Provides a vague description of data collection tool(s)/ source(s) used to report progress on performance measures. (1 point)
	 Vendor selects one County defined performance measures to report on during the contract period. (1 point)
	 Vendor provides one Agency defined performance measures to report on during the contract period. (1 point)

16. Budget (Maximum points for section is 15 out of 100)

 Describe the total Agency budget; total Program budget; and specific amount of CSP funding being requested (Administrative, Operational, Direct Services).

1. Vendor includes recent agency audit (between the period Jan. 1, 2014-Dec. 31,
2016) conducted by a Certified Public Accountant. (Signed audit that includes
an Independent Auditor's Report expressing an opinion regarding all pertinent
material aspects of the agency's finances.) (3 points)
2. Provides a clear description of the agency's current fiscal year budget. (3
points)
3. Provides a clear description of the total program budget for the time period for
which CSP funds are being requested. (3 points)
4. Provides reasonable and necessary expenditures for the proposed plan. (3
points)
5. Includes a complete budgetary schedule/timeline for the length of the
program. (3 points)
1. Vendor includes partial audit report (not completed and not signed by an
independent auditor) between the period Jan. 1, 2014-Dec. 31, 2016. In
addition, vendor includes recent financial statements (between the period Jan.
1, 2014-Dec. 31, 2016). (2 points)
2. Provides a general description of the agency's current fiscal year budget. (2
points)
3. Provides a general description of the total program budget for the time period
for which CSP funds are being requested. (2 points)
4. Provides most of the reasonable and necessary expenditures for the proposed
plan. (2 points)
5. Includes a partial budgetary/timeline schedule for the initial phase of the
program. (2 points)

(Poor)	1. Vendor does not include an audit; however, vendor includes recent financial
1 point per criteria met	statements only (between the period Jan. 1, 2014-Dec. 31, 2016). (1 point)
for a total of 5 points	2. Provides the agency's previous year budget. Prior to 2016. (1 point)
	3. Provides a vague description of the total program budget for the time period for which CSP funds are being requested. (1 point)
	4. Expenditures are unreasonable or unnecessary. (1 point)
	5. Schedule is vague, not within program limits, or has unrealistic timeline. (1
	point)

17. Organization Information (Maximum points for section is 3 out of 100)

Describe the management and staff functions with qualifications and experience that is related to the program for which funds are being requested.

(Excellent)	1. Describes all management functions with information about staff qualifications
3 points per criteria met	and experience that is related to the program for which funds are being
for a total of 3 points	requested. (3 points)
(Fair)	1. Describes some of the management functions with partial information on staff
2 points per criteria met	qualifications and experience that is related to the program for which funds are
for a total of 2 points	being requested. (2 points)
(Poor)	1. Provides organization chart but does not describe the management functions
1 point per criteria met	or provide information about staff qualifications and experience that is related
for a total of 1 point	to the program for which funds are being requested. (1 point)

18. Available Resources and Sustainability (Maximum points for section is 12 out of 100)

Describe other funding sources that are available, and have been received to support your	
organization to address this need (or solve this problem).	

organization to address this need (or solve this problem).		
(Excellent)	1. Attaches a list of three or more funding sources (corporate, government,	
3 points per criteria met	foundation, individuals, etc.) that is related to the program for which funds are	
for a total of 12 points	being requested AND relative to the requested funding amount. (3 points)	
	2. Provides a clear description addressing how program will continue if funding	
	request is partially funded. (3 points)	
	3. Provides a clear description of the leverage potential of Fulton County funding.	
	(3 points)	
	4. Organization never defaulted on a loan or grant. Organization never returned	
	funds for misuse or inability to meet deliverables. (3 points)	
(Fair)	1. Attaches a list of at least two funding sources (corporate, government,	
2 points per criteria met	foundation, individuals, etc.) that is related to the program for which funds are	
for a total of 8 points	being requested AND relative to the requested funding amount. (2 points)	
	2. Provides a statement that partially addresses how program will continue if	
	partially funded. (2 points)	
	3. Provides a statement that partially addresses how Fulton County funding will	
	be leveraged. (2 points)	
	4. Organization never defaulted on a loan or grant, but has returned funds for	
	inability to meet deliverables. (2 points)	
(Poor)	1. Attaches a list of one other funding source (corporate, government,	
1 point per criteria met	foundation, individuals, etc.) that is related to the program for which funds are	
for a total of 4 points	being requested AND relative to the requested funding amount. (1 point)	
	2. Provides statement that does not adequately address how the program will	
	continue if partially funded. (1 point)	
	3. Provides statement that does not adequately address how Fulton County	
	funding will be leveraged. (1 point)	
	4. Organization defaulted on a loan or grant. Organization returned funds for	
	misuse or inability to meet deliverables. (1 point)	

19. General Attributes (*Maximum points for section is 6 out of 100***)**

(Excellent)	1. Written with no errors. (3 points)
3 points per criteria met	2. Uses research data that is acceptable and relevant to the proposed program. (3
for a total of 6 points	points)
(Fair)	1. Written with 1-3 errors (2 points)
2 points per criteria met	2. Uses research data that is somewhat relevant to the proposed program. (2
for a total of 4 points	points)
(Poor)	1. Written with several (more than 3) errors. (1 point)
1 point per criteria met	2. Uses research data that has no connection to the proposed program. (1 point)
for a total of 2 points	

20. Conclusion (Maximum points for section is 6 out of 100)

(Excellent)	1. Provides a summary statement with possible solutions based on the proposal.
3 points per criteria met	(3 points)
for a total of 6 points	2. Places the focus of the project on the required need and relevancy. (3 points)
(Fair)	1. Provides a summary statement of a few methods used and possible solutions
2 points per criteria met	based on the proposal. (2 points)
for a total of 4 points	2. Places the focus of the project on the required need but does not site the relevancy. (2 points)
(Poor)	1. Provides an incomplete summary with vague references to the proposed
1 point per criteria met	solutions. (1 point)
for a total of 2 points	2. Places no focus on the required need. (1 point)

21. Bonus (Maximum points for section is 1 out of 100)

(Excellent)	1. Submitted RFP at least one day prior to the deadline. (1 point)
1 point per criteria met	(RFP Submitted by Sunday, January 8, 2016 3:00 p.m.)
for a total of 1 point	

Acknowledgment:

If funded, all advertising, promotions and other publicity in connection with the supported program(s) must include the following acknowledgment:

"Funding provided in part by the Fulton County Board of Commissioners, under the guidance of the Fulton County Department of Housing and Community Development."

Assurances:

This provision will also be extended to cover all subcontracts. The applicant assures and certifies with respect to the RFP that:

1. It possesses legal authority to apply for the RFP and that a resolution motion or similar action has been adopted or passed as an official act of the applicant's governing body authorizing the completion of the RFP, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the RFP and to provide such additional information as may be required.

2. No person shall on the basis of race, color, sexual orientation, religion, gender, age, national origin or disability be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity for which the applicant receives Fulton County Government financial assistance.

3. The following statement will be included by the applicant when implementing a program / activity that is funded by Fulton County Government: "No person shall, on the basis of race, color, sexual orientation, religion, gender, age, national origin or disability, be excluded from employment under a contract funded in whole or part by Fulton County Government."

4. It will prohibit employment discrimination where: (1) the primary purpose of a RFP is to provide employment or (2) discriminatory employment practices will result in disparate treatment of persons who are or should be benefiting from the grant-aided program / activity.

5. It will establish safeguards to prohibit employees from using their positions for a purpose that is, or gives the appearance of being, motivated by desire of private gain for themselves or others, particularly those with whom they have family, business, or other ties.

6. It will give Fulton County Government, the Fulton County Department of Housing and Community Development, or other grantor agency through authorized representatives the access and right to examine all records, books, papers, or other documents related to the RFP.

7. It will immediately inform the Fulton County Department of Housing and Community Development staff or designee, of any major changes in the agency (i.e. change in contact information, program locations, etc.)

8. It is the policy of Fulton County Government that minority and female business enterprises shall have maximum opportunity to participate in Fulton County Government projects. Consequently, Fulton County Government's Minority/ Female Business Enterprise Program has established a goal that at least thirty-three percent (33%) of the dollar value of all publicly awarded contracts shall be with businesses owned and controlled by members of established minority/female groups. This shall in no way be considered or operate as a fixed quota. In this regard, the agency to which any award of this solicitation

is made shall take all necessary and reasonable steps in accordance with this solicitation to ensure that minority / female business enterprises have the maximum opportunity to participate in the resulting contract. The agency shall not discriminate on the basis of race, color, sexual orientation, religion, gender, age, national origin or disability in the award of performance of any subcontracts or purchase orders resulting from or relating to this solicitation. Moreover, the agency prior to the owner's award of any contract related to this solicitation shall take affirmative action and otherwise make good faith efforts as described in this section to subcontract with and select contractors, vendors, and suppliers from minority / female business enterprises.

9. The State of Georgia prohibits the use of public funds in any way that advances either directly or indirectly the purposes of any sectarian institution. Agency assures under penalty of law that the receipt of public funds from Fulton County Government is not in furtherance of any sectarian institution.

We, the undersigned, certify that to the best of our knowledge and belief, data contained in this RFP is accurate and true. This RFP document has been duly authorized by the governing body of the applicant agency and the agency / program will comply with the necessary requirements, certifications and assurances if funding is awarded by Fulton County Government.

Chair, Board of Directors: _____

Date: _____

Executive Director or Corporate Secretary:

Date: _____

CSP RFP Terms/Definitions/Conditions:

Term	Definition
Addendum	Revision to the Proposal documents issued by the County prior to the receipt of proposals
Administrative Expenses	Grant funds that are spent on executive / management staff and administrative support staff salaries, salary fringe, and benefits; etc.). (Note: Not more than 5% of grant award can be used for administrative costs. Includes direct and indirect charges for administration of the grant)
Applicant/Agency	The entity of individual submitting a proposal in response to this Proposal.
BOC	Fulton County Board of Commissioners
Collaboration	Partnerships or collaborations in which your program is engaged or will engage and how those partnerships or collaborations work towards efforts to achieve the Funding Objective for the target population.
Commencement of Work	The County's obligation will commence when the contract is approved by the Board of County Commissioners. The County may set a different starting date for the contract. The County will not be responsible for any work done by the proposer, even work done in good faith, if it occurs prior to the contract start date set by the County.
Community Services Program (CSP)	The Community Services Program is the County's principal avenue for funding social services programs pursuant to the County's Strategic Plan. As part of Fulton County's commitment to ensuring the self-sufficiency of the people of Fulton County, a number of specific objectives and related key performance indicators have been established as a way to measure our success over time.
Costs Incurred by Proposers	All expenses incurred with the preparation and submission of proposals to the County, or any work performed in connection therewith, shall be borne by the proposer. No payment will be made for proposals received, or for any other effort required of or made by the proposers, prior to commencement of work as defined by a contract approved by the Board of County Commissioners.
Direct Service Expenditures	Grant funds utilized to provide services directly to agency/program participants such as payments made on behalf of participants for rent, utilities, food, shelter, transportation (rentals, gas, and parking, bus drivers, public transportation costs, etc.), scholarships and day care vouchers, salaries and fringe benefits for direct service personnel (Case Managers, Educators, Subcontractors, etc.), program supplies (educational/instructional materials, paper, pencils, markers, etc.) directly consumed by participants. Program materials that may be pertinent to the scope of services of a funded program and that aid in grantee meeting contracted program outcomes are included in this definition (i.e. children's story books, educational games, puzzles, and flash cards).
Non Profit Agency	An organization that does not operate for profit and has a 501 (c) 3 tax designation from the U.S. Internal Revenue Service.
Operational Expenditures	Grant funds used to conduct agency/ organizational functions that are secondary to program service delivery such as office/ warehouse lease or mortgage expenses, office supplies (pens, toner, paper, etc.), utility expenses, transportation expenses (staff travel expenses), marketing/catalogues, etc.
Proposal	The document submitted by the applicant in response to this Proposal.
Proposal Guarantee	Proposer guarantees their commitment, compliance, and adherence to all requirements of the RFP by submission of their proposal.

RFP Terms/Definitions/Conditions (continued):

Term	Definition
Proprietary/Confidential Information	Proposers are hereby notified that all information submitted as part of, or in support of, proposals will be available for public inspection after opening of proposals, in compliance with
mormation	the State of Georgia "The Open Record Act" enacted in March, 2012.
Responsible Applicant	A person or entity that has the capability in all respects to perform fully and reliably the contract requirements.
Responsive Applicant	A person or entity that has submitted a bid or proposal that conforms in all material respects to the requirements set forth in the invitation for bids or request for proposals.
Service Delivery Site	Physical location where the program in which grant funding is being requested to support is held.
Scope of Work	All of the services specified, indicated, shown, or contemplated by the Contract. The exact manner in which grant funds will be used.
Subcontractor/sub-consultant	An individual, firm, corporation or any combination thereof, with a direct contract with Consultant/Contractor for the performance of a part of the work.
Target Area / Fulton County Commission District	Geographic area / Commission District in which the agency will deliver services.
Target Population	A specific sector of people the agency intends to serve. The description of the target population should include the geographical area (state, city, county, neighborhood, etc.) covered by the people designed for the program, as well as the age group and gender.
Technical Assistance Workshops	Workshops held throughout Fulton County to familiarize agencies with the Community Services Program, as well as provide agencies with an opportunity to gain clarity needed to submit a proposal that complies with the requirements.
Unduplicated	Clients counted once during a specified timeframe, regardless of the number/ amount of services received from the agency.
WebGrants	Grants management software utilized by Fulton County for the electronic administration of the Community Services Program.

RFP Submission Reminders

Last Day for questions to be submitted to Fulton County Purchasing is: Thursday, December 29, 2016 By 11:00 a.m.

> Deadline for receipt of 2017 RFP is: Monday, January 9, 2017 By 3:00pm

RFP must be completed and submitted ONLINE via Fulton County WebGrants application system <u>http://fultoncountyga.gov/WebGrants</u> on or before the January 9, 2017, 3:00pm deadline

Hard copy and Facsimile RFPs WILL NOT be accepted.

******RFPs received after the deadline <u>WILL NOT</u> be accepted.******

Incomplete RFPs WILL NOT be processed.

Fulton County District Locator:

To access the Fulton County District Maps, visit the Fulton County Geographic Information System (GIS) Website at <u>http://www.fultoncountyga.gov/gis-maps</u>

Below are instructions for two (2) options on how to determine which Fulton County Commission District residents/participants reside in.

Option 1:

Fulton County Commission District Locator Instructions:

- Go to: <u>http://www.fultoncountyga.gov/commissioners</u>
- Go to right side menu and look for the following verbiage: "Not sure what district you're in? Enter your address below to find out!"
- Enter street address

If address does not appear, you may need to use an abbreviated suffix when searching, such as Dr., Rd., Ln. or just enter the street number and street name without a suffix (i.e. 141 Pryor).

> Enter City and Select Find District

If the address entered is registered in Fulton County, the results will show an address match and list the Fulton County Commission District (i.e. District 1, 2, 3, 4, 5, or 6).

Option 2:

<u>Fulton County GIS Map Instructions:</u> Search Addresses to determine Fulton County Commission District

- Go to: <u>http://www.fultoncountyga.gov/fcgis-home</u> (Fulton County Geographic Information System)
- > Left side Menu -Click on "Property Profile"
- Enter address and click search (example: 141 Pryor St SW)
 - If address does not appear, you may need to use an abbreviated suffix when searching, such as Dr., Rd., Ln. or just enter the street number and street name without a suffix (i.e. 141 Pryor).
- > Results of search will appear. Click desired result
- > Under "Property Profile", scroll down to the section labeled, "Political"
- The Commission District and Commissioner's name will display under the section labeled, "Political"
- To enter new address, go to left side menu Click on "Property Profile" and repeat the steps above.

Fulton County Department of Housing and Community Development Office of Grants and Community Partnerships 137 Peachtree Street, SW, Suite 100 Atlanta, GA 30303 404-613-7944

> FRANKIE L. ATWATER, MPA, HDFP Director Department of Housing and Community Development

Appendix B: Grant Reviewer Evaluation Form

Thank you for your participation in this review process. The grant proposal narrative is in response to the Fulton County 2017 Community Services Program RFP. Only the proposal narrative will be evaluated –no budget or bio-sketch information, etc., is included for this review. Please use the following form that details the evaluation criteria and provides a space for scoring each section along with additional input. When completed, please return this form via email to [recipient email removed] by **Friday**, **July 28**th. Your time and effort in this process is greatly appreciated!

Reviewer Information

Name:

Professional Title:

Affiliation:

Please give a very brief description of your experience or expertise pertinent to the proposal:

Community Services Program RFP Evaluation Criteria

After you have reviewed the grant proposal narrative, please evaluate each section's response to the information requested in the RFP. Each section has specific criteria that should be rated on a three-point scale (3- Excellent, 2- Fair, or 1- Poor). A description of what qualifies for each rating is given for each criterion. Please give one score per criteria, and provide additional comments in the space provided.

1. GENERAL AGENCY INFORMATION: Describe the purpose of your agency and the services that your agency provides. (Maximum points for section is 3 out of 60)	Score
 Purpose of the program is clear and thorough. (3 points) Purpose of the program is somewhat clear and has a few areas that need additional supporting research. (2 points) Purpose of the program is unclear and incomplete. (1 point) Comments: 	

	DS: Describe the need (or problem) in Fulton County that you to address with CSP funding. (Maximum points for section is 15	Score
Specific Need	 Identifies and describes the specific need adequately. (3 points) Specific need is partially identified. (2 points) Provides a vague description of the specific need to be addressed. (1 point) 	
Population Service Area	 Describes the underserved population service area. (3 points) Population service area is partially identified. (2 points) Provides a vague description of the population service area. (1 point) 	
Fulton County Residents Served	 Identifies how many Fulton County residents will be served by gender, race, age, income, and County Commission District. (3 points) Identifies how many Fulton County residents will be served by only two of the five variables (gender, race, age, income, or County Commission District). (2 points) Identifies how many Fulton County residents will be served, but does not include the five variables (gender, race, age, income, and County Commission District). (1 point) 	
Target Population	 Describes how proposed project will assist and impact the target population. (3 points) Proposal has some strong points, but lacks specifics on meeting the need of the target population. (2 points) Information provided on meeting the needs of target population is weak. (1 point) 	
Statistics About the Need	 Provides statistics (federal, state, and or local) for the need or problem that the program is proposing to address. (3 points) Provides general statistics (not based on actual federal, state, or local data) for the need or problem that the program is proposing to address. (2 points) Statistics provided are not related to the need or problem that the program is proposing to address. (1 point) 	
Comments:		

3. APPROACH	AND DESIGN: Describe the specific activities and services that	Score
your program	will provide and how your program will accomplish it.	
(Maximum poi	nts for section is 15 out of 60)	
Activities and Services Provided	 Identifies the activities and services that will be provided. (3 points) Partially identifies the activities and services that will be provided. (2 points) Provides a vague description of the activities and services to be provided. (1 point) 	
Activities and Services Accomplished	 Identifies how the activities and services will be accomplished. (3 points) Partially identifies how the activities and services will be accomplished. (2 points) Provides a vague description of how the activities and services will be accomplished. (1 point) 	
Strategic Priority Area Program Objectives* *Please refer to Selections from 2017 CSP RFP document	 Proposal addresses three Fulton County "All People are Self-Sufficient" strategic priority area program objectives. (3 points) Proposal addresses two Fulton County "All People are Self-Sufficient" strategic priority area program objectives. (2 points) Proposal addresses one Fulton County "All People are Self-Sufficient" strategic priority area program objectives. (1 point) 	
CSP Funding Priorities* *Please refer to Selections from 2017 CSP RFP document Community Collaborative Relationships	 Proposal addresses three CSP funding priorities as identified by the primary service category selected. (3 points) Proposal addresses two CSP funding priorities as identified by the primary service category selected. (2 points) Proposal addresses one CSP funding priority as identified by the primary service category selected. (1 point) Provides more than seven instances of community collaborative relationships to assist organization in addressing the need. (3 points) Provides 4-7 instances of supporting community collaborative relationships to assist organization in addressing the need. (2 points) Provides less than four instances of supporting community collaborative relationships to assist organization in addressing the need. (2 points) 	
Comments:		

Are utilized to track and report program outcomes. (Maximum t of 60) Provides a clear explanation of the methods to be used and the specific goals to be obtained. (3 points) Provides a clear explanation for some of the methods used and the majority of goals for the project. (2 points) Provides a vague description of the methods to be used and goals to be obtained. (1 point) Describes the major milestones to be achieved with a supporting schedule. (3 points) Describes the majority of the milestones for the project with a supporting schedule. (2 points) Describes only a few of the major milestones for the project and does not include supporting schedule. (1 point) Identifies the specific data collection tool(s)/ source(s) used to report progress on performance measures. (3 points) Provides a general description of data collection tool(s)/ source(s) used to report progress on performance measures. (2 points) Provides a vague description of data collection tool(s)/ source(s) used to report progress on performance measures.	
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(1 point)	
Vendor selects three County-defined performance measures	
to report on during the contract period. (3 points)	
Vendor selects two County-defined performance measures to	
• • •	report on during the contract period. (2 points) Vendor selects one County-defined performance measures to report on during the contract period. (1 point) Vendor provides three Agency-defined performance measures to report on during the contract period. (3 points) Vendor provides two Agency-defined performance measures to report on during the contract period. (2 points) Vendor provides one Agency-defined performance measures to report on during the contract period. (2 points) Vendor provides one Agency-defined performance measures to report on during the contract period. (1 point)

5. COI	NCLUSION (Maximum points for section is 6 out of 60)	Score
•	Provides a summary statement with possible solutions based on the	
	proposal. (3 points)	
•	Provides a summary statement of a few methods used and possible	
	solutions based on the proposal. (2 points)	
•	Provides an incomplete summary with vague references to the proposed	
	solutions. (1 point)	
•	Places the focus of the project on the required need and relevancy. (3	
	points)	
•	Places the focus of the project on the required need but does not cite	
	the relevancy.	
	(2 points)	
•	Places no focus on the required need. (1 point)	
Comm	nents:	
GENE	RAL ATTRIBUTES (Maximum points for section is 6 out of 60)	Score
•	Written with no errors. (3 points)	
•	Written with no errors. (3 points) Written with 1-3 errors (2 point)	
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	Written with 1-3 errors (2 point)	
•	Written with 1-3 errors (2 point) Written with several (more than 3) errors (1 point)	
•	Written with 1-3 errors (2 point) Written with several (more than 3) errors (1 point) Uses research data that is acceptable and relevant to the proposed	
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•	 Written with 1-3 errors (2 point) Written with several (more than 3) errors (1 point) Uses research data that is acceptable and relevant to the proposed program (3 points) Uses research data that is somewhat relevant to the proposed program. 	
•	 Written with 1-3 errors (2 point) Written with several (more than 3) errors (1 point) Uses research data that is acceptable and relevant to the proposed program (3 points) Uses research data that is somewhat relevant to the proposed program. (2 point) 	
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