

IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

IN RE: SCOTT HARROLD,) OEIG Case #12-02223

OEIG FINAL REPORT (REDACTED)

Below is an amended final summary report from an Executive Inspector General. The General Assembly has directed the Executive Ethics Commission (Commission) to redact information from this report that may reveal the identity of witnesses, complainants or informants and “any other information it believes should not be made public.” 5 ILCS 430/20-52(b).

The Commission exercises this responsibility with great caution and with the goal of balancing the sometimes-competing interests of increasing transparency and operating with fairness to the accused. In order to balance these interests, the Commission may redact certain information contained in this report. The redactions are made with the understanding that the subject or subjects of the investigation have had no opportunity to rebut the report’s factual allegations or legal conclusions before the Commission.

The Commission received this amended final report from the Governor’s Office of Executive Inspector General (“OEIG”) and a response from the agency in this matter. The Commission, pursuant to 5 ILCS 430/20-52, redacted the final report and mailed copies of the redacted version and responses to the Attorney General, the Governor’s Executive Inspector General and to Scott Harrold at his last known address.

The Commission reviewed all suggestions received and makes this document available pursuant to 5 ILCS 430/20-52.

FINAL REPORT

I. INTRODUCTION AND ALLEGATIONS

On October 31, 2012, the Office of Executive Inspector General (OEIG) received a complaint alleging that former Senior Parole Agent Scott Harrold engaged in sexual contact with female parolees assigned to his caseload. Because the Illinois Department of Corrections (IDOC) and the Illinois State Police (ISP) were also investigating this allegation, the OEIG closed its investigation on November 13, 2012. On May 23, 2013, the OEIG learned that the IDOC and ISP investigations had been completed, that Mr. Harrold had resigned from IDOC after confessing to IDOC investigators that he had improper sexual contact with at least one female parolee under his supervision, and that criminal charges would not be pursued against Mr. Harrold. Thereafter, the OEIG reopened its investigation in June of 2013, focusing on whether the IDOC Parole Division was following policies designed to prevent this type of misconduct. During the course of the investigation, the OEIG discovered that Mr. Harrold and [Employee 1]

conduct numerous drug tests on female parolees without the assistance of a female Parole Agent in violation of IDOC rules.

II. BACKGROUND

A. Illinois Department Of Corrections Parole Division

"The mission of the Department of Corrections is to protect the public from criminal offenders through a system of incarceration and supervision which securely segregates offenders from society, assures offenders of their constitutional rights and maintains programs to enhance the success of offenders' reentry into society."¹ The IDOC Parole Division (Parole Division) "serves to address public safety and the reentry process."² As of September 26, 2014, there were 28,158 adult parolees in Illinois, and of that number 2,675 were female. As of September 26, 2014, there were 332 Parole Agents working in Illinois, of which 86 were female. As of September 20, 2014, there were 34 Parole Commanders across the State supervising those Parole Agents.³

B. IDOC Parole Division Drug Testing Policies

Parole Agents must conduct drug tests on a minimum of 10 percent of their assigned offenders on a monthly basis.⁴ Per IDOC Parole Directives, a Parole Agent conducting a drug test of a parolee shall be the same gender as the parolee.⁵ "If same gender Parole Agent is not available, the drug test must be facilitated through community service providers, department vendors or local law enforcement."⁶ Before conducting the test, the parolee shall be "pat" searched and the Parole Agent shall visually search the testing area.⁷ The cup used for the drug test shall remain in the view of the person observing the drug test at all times.⁸ "All drug tests shall be . . . directly observed."⁹

C. IDOC Employee Conduct Policies

"Employees shall conduct themselves in a manner that will not reflect unfavorably on [IDOC] and shall not engage in conduct that is unbecoming of an employee or that may reflect unfavorably on or impair the operations of [IDOC]."¹⁰ "Employees shall comply with [IDOC] rules, written procedures, bulletins and written or verbal orders issued by [IDOC] authorities."¹¹ IDOC "shall require employees to conduct themselves in a professional manner and, whether on

¹ <http://www2.illinois.gov/DOC/aboutus/Pages/DOCOverview.aspx> (last visited on September 18, 2014).

² <https://www.illinois.gov/DOC/parole/Pages/default.aspx> (last visited on April 29, 2015).

³ The OEIG obtained a document from IDOC listing all Parole Commanders and the number of Parole Agents each Commander supervised as of September 20, 2014. The list also listed three vacancies in Parole Commander positions, and it stated the supervisors of "Agents on [Leave of Absence]" are "various."

⁴ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(A).

⁵ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(E).

⁶ *Id.*

⁷ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(A).

⁸ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(C).

⁹ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(F).

¹⁰ 20 Ill. Adm. Code 120.30.

¹¹ 20 Ill. Adm. Code 120.40(c).

duty or off duty, not engage in conduct that is unbecoming of a State employee or that may reflect unfavorably on or impair operations of [IDOC].”¹² IDOC “[e]mployees shall comply with [IDOC] rules, written procedures, bulletins, and written or verbal orders issued by proper authorities.”¹³

III. INVESTIGATION

In order to determine whether former Senior Parole Agent Scott Harrold engaged in sexual contact with female parolees under his supervision, the OEIG obtained and reviewed the IDOC and ISP investigative files on him. The OEIG also obtained and reviewed the Automated Management System¹⁴ (AMS) entries for 101 female parolees, including drug test entries, in order to determine whether improper drug testing of female parolees was common among Parole Agents. The OEIG also interviewed [Parolee 1], [Employee 1], and [Parole Supervisor 1] and [Parole Supervisor 2].

A. IDOC And ISP Investigation Of Former Senior Parole Agent Scott Harrold

On September 9, 2012, IDOC initiated an investigation into the allegation that then-Senior Parole Agent Scott Harrold engaged in sexual contact with female parolees. During its investigation against Mr. Harrold, IDOC interviewed multiple potential witnesses, parolees, Parole Agents, and Mr. Harrold. On October 19, 2012, IDOC interviewed [Parolee 2], who said that Mr. Harrold gave her a ride to the Danville Parole Office “generally every Sunday.”¹⁵ [Parolee 2] stated that she had performed oral sex on Mr. Harrold five to six times since September 2012, and that they have had sexual intercourse in his office at least once. She said that Mr. Harrold told her that if she did not “take care” of him that he would not “take care of her.” That same day, IDOC interviewed parolee [Parolee 3]. [Parolee 3] said that she performed oral sex on Mr. Harrold so he would report that she gave a clean drug test.¹⁶ [Parolee 3] said that Mr. Harrold told her it was a “favor for a favor.” On October 24, 2012, IDOC interviewed [Parolee 4], who said that Mr. Harrold conducted a search of her person during her last drug test. She said that Mr. Harrold found a condom filled with “clean pee” on her person. [Parolee 4] stated that Mr. Harrold was mad and told her that it was enough to send her “back to prison,” and they began to discuss what she could do. [Parolee 4] stated that Mr. Harrold told her that if she would put on “one of those ‘stripper outfits’ he would not submit” a dirty drug test for her.¹⁷ [Parolee 4] said that Mr. Harrold then picked out an outfit and she dressed in front of him. She said that he made her turn around twice while she was naked and pose with and without the outfit.

IDOC interviewed Mr. Harrold on July 23, 2013. Mr. Harrold said that in October of 2012, he contacted [Parolee 3] and advised her that she needed to have a face-to-face meeting

¹² Illinois Department of Corrections, Administrative Directive 03.02.108(I)(B).

¹³ Illinois Department of Corrections, Administrative Directive 03.02.108(II)(G)(1)(d).

¹⁴ AMS is the system used by the Parole Division to record contact with parolees, including drug tests, either by computer or by calling entries in to an operating center.

¹⁵ Illinois Department of Corrections, Report of Investigation, Case Number [REDACTED]. The information in this and the following paragraph is contained in the aforementioned IDOC Report of Investigation.

¹⁶ A “clean” drug test is a common reference to a drug test that tests negative for drugs.

¹⁷ A “dirty” drug test is a common reference to a drug test that tests positive for drugs.

with him and that a drug test would be administered. He said that while she was in his office she lifted her shirt and showed him her breasts. Mr. Harrold said that he told [Parolee 3] to stop but that she proceeded to “rub his crotch,” unzip his pants, and perform oral sex on him. He said that this incident was the only time it had occurred and that he did submit a clean drug test for her. At that point Mr. Harrold ended the interview and told IDOC investigators that he would immediately begin the process of retiring. The IDOC investigation concluded that Mr. Harrold violated multiple IDOC rules regarding individual conduct, that he failed to follow procedural guidelines when transporting female parolees and conducting drug testing, and that he implicated himself in a felony crime by receiving oral sex from [Parolee 3] in return for his submission of a clean drug test for her. However, because Mr. Harrold resigned from IDOC effective July 24, 2013, no discipline was administered.

On October 19, 2012, IDOC contacted ISP regarding Mr. Harrold. ISP conducted a thorough investigation into the allegations against Mr. Harrold, including interviews of 21 current or former parolees, the two parolees who had reported that Mr. Harrold engaged them in sexual contact, three potential witnesses, and Mr. Harrold, as well as collecting and analyzing DNA evidence. The two parolees interviewed told ISP investigators that Mr. Harrold had engaged in sexual contact with them on numerous occasions. However, during his interview with ISP, Mr. Harrold denied the allegations against him. Additionally, the DNA evidence which ISP had gathered was not conclusive as to whether Mr. Harrold engaged in sexual contact with the parolees. On May 2, 2013, the Vermilion County State’s Attorney’s Office declined to file criminal charges against Mr. Harold, citing a lack of evidence.¹⁸

The OEIG contacted Mr. Harrold on July 31, 2015, and informed him that the OEIG would like to speak with him regarding his time as a Parole Agent and the circumstances surrounding his resignation. Mr. Harrold declined to speak with the OEIG.

B. OEIG Investigation Of IDOC Parole Division Drug Testing Practices

While examining the records of parolees who had been assigned to former Senior Parole Agent Scott Harrold’s caseload, the OEIG discovered that multiple male Parole Agents were conducting drug tests on female parolees without the assistance of a female Parole Agent. Thereafter, the OEIG expanded the scope of its investigation to determine whether male parole agents drug testing female parolees without the assistance of a female Parole Agent or other assistant was common practice among male Parole Agents.

The OEIG initially obtained and reviewed the AMS entries of the three female parolees who reported that Mr. Harrold had engaged in sexual behaviors with them. In order to identify other parolees who may have been the subjects of violations of Parole Division policy, the OEIG next obtained the AMS entries of 19 female parolees who had contact with Mr. Harrold. During that review the OEIG discovered that [Employee 1] conducted multiple drug tests on female parolees without the assistance of a female Parole Agent or other assistant. The OEIG then obtained the AMS entries of 34 female parolees with whom [Employee 1] had contact to

¹⁸ As Mr. Harrold’s statements to IDOC investigators were made to his employer during an interview that he was required to participate in as a condition of his employment, those statements would potentially be inadmissible in a criminal proceeding. See *People v. Haleas*, 404 Ill.App.3d 668, 674 (2010).

determine the extent to which he had been drug testing female parolees without the assistance of a female Parole Agent or other assistant. Finally, the OEIG obtained and reviewed the AMS entries of 45 female parolees (25 located in Springfield and surrounding areas and another 20 from other parts of Illinois) assigned to various Parole Agents to determine the extent of the issue of male Parole Agents improperly drug testing female parolees.

The OEIG discovered that, of the 225 drug tests performed, 80 were conducted on 43 female parolees by a male Parole Agent without the assistance of a female Parole Agent or other assistant.¹⁹ The OEIG also discovered that, 36 of 45 drug tests [Employee 1] performed on female parolees were conducted without the assistance of a female Parole Agent or other appropriate assistant. The OEIG also discovered that Mr. Harrold had conducted 24 drug tests on female parolees without the assistance of a female Parole Agent or other appropriate assistant. No other Parole Agent included in the review had conducted more than four drug tests on female parolees without the assistance of a female Parole Agent or other appropriate assistant.

C. Interview Of [Parolee 1]

On May 20, 2014, the OEIG interviewed [Employee 1's] parolee [Parolee 1]. [Employee 1] had drug tested her but did not list a female Parole Agent as an assistant in the AMS entry for the drug tests.

[Parolee 1] said that one of the Parole Agents she has been assigned to was [Employee 1] among others, and that she has never been assigned to a female Parole Agent. [Parolee 1] said that she sees her Parole Agent approximately once a month, that it is usually at her family residence, and that neither a female Parole Agent nor a community service provider, department vendor, or local law enforcement is present for the drug testing. [Parolee 1] said that when her Parole Agent visits her residence, she ([Parolee 1]) and the Parole Agent are never alone, as she would always have her mother or her children at the residence during the visits.

The OEIG asked [Parolee 1] to describe the standard process used by her Parole Agent when she is being drug tested, and she said that:

- the Parole Agent provides her ([Parolee 1]) a drug test;
- the Parole Agent stands outside the restroom's closed door;
- she urinates in the drug test alone with no one watching; and
- she hands the Parole Agent the urine sample to be tested.

When asked if the Parole Agents searched the restroom prior to her taking the drug test, [Parolee 1] said they did not. When asked about the process for when she is drug tested at the Danville Township Building, [Parolee 1] said that the Parole Agent handed her a drug test and she went into the public restroom alone. [Parolee 1] said that each drug test was accomplished in the same manner, the only difference being the location.

¹⁹ There was a further eight female parolee drug tests that were categorized as "Day Reporting." AMS records do not reflect who collected the "Day Reporting" urine samples, if a same gender assist was present to observe the collection of the urine sample, or who entered the drug test record into AMS.

D. Interviews Of [Employee 1]

On July 17 and 30, 2014, the OEIG interviewed [Employee 1].²⁰ [Employee 1] said that he supervises 131 parolees, and he estimated that at least five of them are female. [Employee 1] said that, when testing a female parolee, he is required to have a female assistant present. [Employee 1] said that the female assistant would observe the female parolee urinate into the drug testing cup.

[Employee 1] said that if he felt the need to drug test a female parolee in the field he would try to find a female police officer to come assist with the drug test. [Employee 1] said another option was to bring the female parolee to a location where there was a female assistant available. [Employee 1] said that, when he does not have a female to assist with a drug test, he will, "go in and search the restroom and make sure there is nothing in there they can alter a test with." He said that he would then set the drug test on the restroom counter, exit the restroom, and have the female parolee take the drug test in the restroom alone. When she came out, [Employee 1] said that he would then test the sample for drugs.

When asked if he does pat down searches of female parolees, [Employee 1] said that he has never patted down a female parolee. [Employee 1] later corrected his previous statement and said that he would pat down a female parolee when he had a witness. The OEIG presented [Employee 1] with the AMS printouts of 22 female parolees whose records reflect that he had drug tested them 36 times but the records do not reflect that there was a female assistant. For each one, [Employee 1] said that he drug tested the women without an assistant present. When asked if he patted any of the female parolees down or ever watched them urinate in the drug test, [Employee 1] said that he had not.

E. Interviews Of IDOC Parole Commanders

During the course of the investigation, the OEIG interviewed two Parole Commanders: [Parole Supervisor 1] on January 28, 2015, and [Parole Supervisor 2] on July 22, 2015. The OEIG asked each Parole Commander how many Parole Agents they supervise. [Parole Supervisor 1] said he supervises six Parole Agents, and [Parole Supervisor 2] said he supervises 13, and each said that only one of their Parole Agents is female. Each said that the female Parole Agents they supervise cannot assist all of the male Parole Agents with their drug testing of female parolees while also handling their own responsibilities. Both [Parole Supervisor 1] and [Parole Supervisor 2] said that their male Parole Agents receive assistance from female Treatment Alternatives for Safer Communities employees when conducting drug tests on female parolees, and [Parole Supervisor 2] said his male Parole Agents also get help from female Illinois Department of Juvenile Justice Aftercare Specialists. Both [Parole Supervisor 1] and [Parole Supervisor 2] stated that they would not know if a male Parole Agent administered a drug test without the assistance of a female Parole Agent or other assistant without looking up the specific AMS entry.

IV. ANALYSIS

²⁰ [Redacted]

A. Former Senior Parole Agent Scott Harrold Engaged In Sexual Contact With A Female Parolee

The IDOC Administrative Rules state that all “[e]mployees shall conduct themselves in a manner that will not reflect unfavorably on [IDOC] and shall not engage in conduct that is unbecoming of an employee or that may reflect unfavorably on or impair the operations of [IDOC].”²¹ IDOC “shall require employees to conduct themselves in a professional manner and, whether on duty or off duty, not engage in conduct that is unbecoming of a State employee or that may reflect unfavorably on or impair operations of [IDOC].”²² As detailed above, IDOC’s investigation of former Senior Parole Agent Scott Harrold revealed that, by his own admission, he engaged in at least one act of sexual contact with a female parolee. IDOC interviewed three different female parolees, and each discussed instances in which Mr. Harrold solicited various sexual favors in exchange for reporting clean drug tests for them. When IDOC interviewed Mr. Harrold he admitted to receiving oral sex from one of these female parolees and submitting a clean drug test for her afterwards. Mr. Harrold then ended the interview and voluntarily resigned from IDOC. The OEIG also contacted Mr. Harrold to interview him regarding his time as a Parole Agent, but he declined to be interviewed.

Mr. Harrold admitted to engaging in sexual contact with a female parolee under his supervision. Such behavior reflects unfavorably on IDOC, is unbecoming of an employee of IDOC, reflects unfavorably on and impairs the operations of IDOC, and is not professional. Therefore, the allegation that Scott Harrold violated the IDOC Administrative Rules and IDOC Administrative Directives by engaging in sexual contact with a female parolee is **FOUNDED**.²³

B. Former Senior Parole Agent Scott Harrold Failed To Comply With IDOC Parole Division Drug Testing Procedures

IDOC policy states that a Parole Agent conducting a drug test of a parolee shall be the same gender as the parolee, and if a Parole Agent of the same gender is not available, “the drug test must be facilitated through community service providers, department vendors or local law enforcement.”²⁴

During the course of its investigation, the OEIG discovered that 10 female parolees’ AMS printouts reflect they were subjected to 24 drug tests by former Senior Parole Agent Scott Harrold with no female assistant listed. Given the vulnerability of parolees and the position of power Parole Agents are in with regard to them, strict adherence to procedures for drug testing is of paramount importance. When these processes are abused, situations like those discussed above are more likely to arise.

²¹ 20 Ill. Adm. Code 120.30.

²² Illinois Department of Corrections, Administrative Directive 03.02.108(I)(B).

²³ The OEIG concludes that an allegation is “founded” when it has determined that there is reasonable cause to believe that a violation of law or policy has occurred, or that there has been fraud, waste, mismanagement, misconduct, nonfeasance, misfeasance, or malfeasance.

²⁴ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(E).

Therefore, the allegation that Scott Harrold violated IDOC Parole Division Drug Testing policy by administering drug tests on female parolees without an appropriate assistant and not facilitated through a community service provider, department vendor, or local law enforcement is **FOUNDED**.²⁵

C. [Employee 1] Failed To Comply With IDOC Parole Division Drug Testing Procedures

In addition to the requirement that drug tests be administered by a same gender parole agent or appropriate assistant, Parole Agents are also required to “pat” search the parolee prior to the drug test and to visually search the testing area.²⁶ The cup used for the drug test shall remain in the view of the person observing the drug test at all times.²⁷ The Parole Agent shall directly observe the drug test.²⁸

During the course of its investigation, the OEIG discovered that 22 female parolees’ AMS printouts reflect they were subjected to 36 drug tests by [Employee 1] with no female assistant listed. The OEIG asked [Employee 1] about 35 of the drug tests on those 22 female parolees, and [Employee 1] said that he drug tested these women without an assistant present. When the OEIG asked [Employee 1] if he had patted down any female parolees, [Employee 1] said that he had not. Finally, the OEIG asked [Employee 1] if he had watched any female parolees produce a drug test sample, and he said no, meaning he did not keep the drug test in view at all times.

[Employee 1] admitted to drug testing 22 female parolees without an assistant present. As mentioned above, strict adherence to drug testing procedures are of paramount importance. [Employee 1’s] failure to follow drug testing procedures creates the possibility of the drug tests having been compromised.

Therefore, the allegation that [Employee 1] violated IDOC Parole Division Drug Testing policy by administering drug tests on female parolees without a female Parole Agent and not facilitated through a community service provider, department vendor, or local law enforcement, by not patting down female parolees prior to drug testing them, by not keeping the drug test in his view at all times, and by allowing the female parolees’ drug tests to not be directly observed is **FOUNDED**.²⁹

V. CONCLUSION AND RECOMMENDATIONS

The OEIG makes the following conclusions:

²⁵ While the records reflect that other Parole Officers administered drug tests on female parolees without an appropriate assistant present, no other Parole Officer included in the review engaged in such conduct more than four times.

²⁶ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(A).

²⁷ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(C).

²⁸ Illinois Department of Corrections, Parole Directives, P4.02.105(III)(F).

²⁹ While the records reflect that other Parole Officers administered drug tests on female parolees without an appropriate assistant present, no other Parole Officer included in the review engaged in such conduct more than four times.

- **FOUNDED** – Former Senior Parole Agent Scott Harrold violated IDOC Administrative Rules and IDOC Administrative Directives by engaging in sexual contact with a female parolee.
- **FOUNDED** – Former Senior Parole Agent Scott Harrold violated IDOC Parole Division Drug Testing policy by administering drug tests on female parolees without a female Parole Agent or other assistant.
- **FOUNDED** – [This finding relates to an individual who received discipline of less than three days' suspension and the Commission is exercising its discretion to redact.]

The OEIG recommends that IDOC place a letter in former Senior Parole Agent Scott Harrold's file referencing this investigation and barring him from employment with the IDOC in the future. The OEIG also recommends that IDOC train [Employee 1] and other Parole Agents in proper drug testing procedures, including the use of appropriate assistants for opposite gender drug tests and the reporting of drug tests in AMS. Additionally, the OEIG recommends that IDOC revise its policies and reporting requirements to make failure to follow drug testing procedures easier for supervisors to detect. Finally, the OEIG recommends that IDOC undertake a full audit of the drug test entries for all of its parolees to ensure they have been drug tested in accordance with IDOC Parole Division Drug Testing policy.

No further investigative action is needed and this case is considered closed.

Date: **October 28, 2015**

Office of Executive Inspector General
for the Agencies of the Illinois Governor
607 East Adams, 14th Floor
Springfield, IL 62701

Grant Anderson
Assistant Inspector General

Melissa Brandenburg
Investigator #160



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RECEIVED
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 BY: _____

**AGENCY OR ULTIMATE JURISDICTIONAL AUTHORITY
 RESPONSE FORM**

Case Number: 12-02223

Return 20 Days After Receipt

Please check the box that applies. (Please attach additional materials, as necessary.)

We have implemented all of the OEIG recommendations. Please provide details as to actions taken:

In accordance with the recommendations, JDOC will train all Parole Agents in proper drug testing procedures through staff meetings. We will ensure Commanders are notified of any opposite sex drug testing that may occur and be sure to notify AMS.

A letter was placed in former Senior Parole Agent Scott Harrold's personnel file. See Attached.

We will implement some or all of the OEIG recommendations but will require additional time to do so.
 We will report to OEIG within _____ days from the original return date.

We do not wish to implement some or all of the OEIG recommendations. Please provide details as to what actions were taken, if any, in response to OEIG recommendations:

John Baldwin
 Signature

Illinois Department of Corrections Director
 Print Agency and Job Title

John Baldwin
 Print Name

November 20, 2015
 Date

Bruce Rauner
Governor



John Baldwin
Acting Director

The Illinois Department of Corrections

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MEMORANDUM

DATE: November 19, 2015

TO: Personnel Transactions
April Alexander

FROM: John Baldwin 
Director

SUBJECT: Former Senior Parole Agent Scott Harrold

Senior Parole Agent Scott Harrold resigned from his position effective July 24, 2013 after being investigated by DOC, ISP and OEIG for conduct of an individual. Former Agent Harrold will not be reinstated or allowed to return to the Illinois Department of Corrections in any capacity.

cc: Scott Harrold's Personnel File
Margaret Hickey, Acting Executive Inspector General
Chief of Staff
Chief of Parole

Mission: To serve justice in Illinois and increase public safety by promoting positive change in offender behavior, operating successful reentry programs, and reducing victimization.

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