POLICY STATEMENT

Policy Statement 4016
Policy Area: Supervision
Effective Date: May 10, 2010
Approved:
Adrienne Poteat, Deputy Director

DISTRIBUTION OF TOKENS TO OFFENDERS

I. COVERAGE

This Policy Statement establishes procedures for the distribution of bus tokens to eligible offenders. Court Services and Offender Supervision Agency (CSOSA) staff having specific responsibilities under these procedures includes Community Supervision Services (CSS) Branch Chiefs, Supervisory Community Supervision Officers (SCSOs), Program Managers and Community Supervision Officers (CSOs). Certain specific CSS token program functions may be designated to Community Supervision Assistants (CSAs), Branch Secretaries and other administrative staff. Office of Management and Administration (M&A) staff have specific administrative and audit review responsibilities. In addition, approved CSOSA programs, outside of CSS, may operate the token program following the same structure, roles and requirements outlined for CSS in this Policy.

II. BACKGROUND

CSOSA is committed to assisting offenders become law-abiding members of the community. The Agency's approach to community supervision includes providing offenders with the necessary assistance, programming, intervention and guidance to help them in many aspects of their lives. Gainful employment and participation in rehabilitative programs are key elements in an offender's ability to become and remain productive in the community. With this in mind, CSOSA will provide limited transportation assistance in the form of bus tokens to eligible offenders to support their job-seeking efforts and participation in treatment and other rehabilitative programs.

III. POLICY

Eligible offenders shall include unemployed offenders who are seeking employment or are in CSOSA-ordered or approved rehabilitative programs (e.g., vocational, educational or treatment) and are in compliance with program and CSOSA guidelines. Additionally, offenders with legitimate financial needs who are currently employed may also be eligible to receive tokens. Distribution of tokens to eligible offenders is subject to funds availability, token allocation levels approved by the respective Associate Director, and adherence to the controls outlined in this policy.

In accordance with the CSOSA Funds Control Policy, Accountable Officers include certifying officers, procurement officers, government credit card holders and other employees who by virtue of their employment are responsible for the obligation, custody, and payment of government funds. Accountable Officers may be held personally liable or subject to disciplinary action for the loss or improper payment of the funds for which they are accountable.

Token Custodians include any CSOSA staff person with responsibility for receipt, control and distribution of tokens. This includes any staff of the Office of Procurement, Office of Financial Management, CSS or another CSOSA division with a participating program, who account for, receive, distribute or order tokens. Token Custodians are Accountable Officers and may be held personally liable or subject to disciplinary action for the loss or improper authorization, handling, safe-keeping or distribution of tokens or improperly maintaining the token control forms prescribed in this Policy Statement. Staff are required to complete CSOSA token custodian training prior to performing any Token Custodian functions.

For CSS token distribution, Branch Chiefs, or their designees, must submit a Branch Token Log Form and supporting Team Token Log form(s), including any requests for additional tokens, to M&A each month. Token requests may only be submitted to M&A following a comprehensive review and reconciliation of the prior-month Branch and Team Token Log forms with the current token inventory. Branch Chiefs, or their designees, shall obtain approved token allocations from M&A staff on a monthly basis for distribution to SCSOs/Program Managers, or their designees, within their Branch. SCSOs/Program Managers, or their designees, are responsible for maintenance and further distribution of the bus tokens to eligible offenders within their Team/Program. CSOs and Program Managers shall determine and authorize offenders eligible to receive agency-purchased bus tokens. CSOs or Program Managers must ensure that the actual distribution of tokens to an eligible offender is documented in the Agency's Supervision and Management Automated Record Tracking (SMART) system using required data elements and formats.

CSOSA divisions with programs outside of CSS that are approved by the Office of the Director to participate in the token program must designate specific staff that will perform the roles and responsibilities of the CSS Branch Chief and the CSS SCSO/Program Manager outlined in this Policy. These staff designations must be submitted in writing to the Office of Procurement for approval prior to program implementation. All requirements and responsibilities outlined in the policy for CSS must be followed by participating non-CSS programs.

IV. AUTHORITIES, SUPERSEDURES, REFERENCES, AND ATTACHMENTS

A. Authorities

Statutory Authority: 111 Stat. 748, Pub. L. 105-33 § 11233; D.C. Official Code § 24-133(b) (2) (D) and (c) (1).

5 C.F.R. §§ 2634.901-.909 (Confidential Financial Disclosure Reports)

B. Supersedures

Policy Statement 4016, dated May 10, 2005

C. Procedural References

CSOSA Funds Control Policy, dated July 7, 2000

D. Attachments

Appendix A. General Procedures
Appendix B. Branch Token Log Form
Appendix C. Team Token Log Form

APPENDIX A
GENERAL PROCEDURES

A. Eligibility Requirements

To be eligible, an offender must be in compliance with applicable judicial orders, United States Parole Commission (USPC) conditions, CSOSA policies and must meet at least one of the requirements below:

1. The offender is actively seeking employment and has a legitimate financial need. The offender must be able to provide documentation of employment-seeking efforts and/or proof of attempts to receive supplemental income;

2. The offender is participating in a CSOSA-ordered or approved rehabilitative program (e.g., vocational, educational or treatment), is in compliance with the program, and has a legitimate financial need;

3. The offender is employed and the SCSO/Program Manager has determined that exigent circumstances exist which qualify the offender. Exigent circumstances include, but are not limited to, a house fire, or sudden eviction. The offender must provide proof of the exigent circumstances; or

4. The offender suffers from physical challenges and is unable to report for office visits due to financial need. (The offender must provide proof of such circumstances.)

B. Token Distribution Limits

1. The SCSO/Program Manager is responsible for determining the pattern of distribution of tokens to offenders.

   a. For an offender who is seeking employment and has a legitimate financial need (Section A.1. above), the pattern of distribution shall not exceed four (4) tokens per week for more than a period of twelve (12) weeks, unless the offender gains employment and the offender's initial paycheck will be issued after the twelve (12) week period. In such cases, the pattern of distribution may include up to four (4) tokens per week for up to four (4) additional weeks.

   b. For an offender who qualifies under Sections A.2. or A.4., the pattern of distribution shall not exceed four (4) tokens per week for more than a period of twelve (12) weeks.

c. For an offender who qualifies under Section A.3., the pattern of distribution shall not exceed sixteen (16) tokens within a four (4) week period.

2. The CSO/Program Manager is responsible for authorizing the distribution of tokens to the offenders in accordance with the approved pattern of distribution. Prior to distributing tokens, the CSO/Program Manager must review SMART to determine if token distribution activity will exceed limitations.

3. When an offender has been authorized the maximum number of tokens allowable under section B.1., no additional tokens shall be authorized during the remaining term of offender supervision unless there is a properly approved re-authorization.

4. An SCSO/Program Manager may re-authorize token distribution in limited circumstances where the offender has reached the initial allowable distribution threshold outlined in section B.1., yet is otherwise eligible to continue to receive tokens. An SCSO/Program Manager may only issue one re-authorization per offender supervision period.

C. Termination and Suspension of Token Distribution

Distribution of tokens may be suspended or terminated due to any of the following circumstances. The CSO must consult with the SCSO prior to the suspension or termination of token distribution. The circumstances do not override existing, related CSOSA policies or procedures.

1. Failure to report for a scheduled appointment, for which tokens were specifically provided, more than two (2) times without a valid reason;

2. Termination from an assigned program or group for which tokens were provided;

3. Failure to actively seek employment or provide verifiable proof of job seeking efforts;

4. Non-compliance with general or special conditions of parole, probation, or supervised release;

5. Documented receipt of supplemental income (e.g., Supplemental Security Income, reduced Metro fare, transportation subsidy or stipends) or

6. CSO/Program Manager verification of offender employment (except as noted in section B.1.a.). Distribution shall be terminated within three (3) weeks of an offender's "start date" or "hire date".

D. Conditions for Reconsideration of Token Suspension/Termination

1. SCSOs/Program Manager shall have the discretion to reconsider the suspension/termination of the distribution of tokens to an offender after an eight (8) week waiting period.

2. The offender must meet the initial eligibility requirements for token distribution (see Section A above) and the basis for the suspension/termination must no longer exist.

3. If the termination/suspension was conduct-based, the offender must have been sanctioned in accordance with any applicable CSOSA policy or guidelines.

E. Distribution and Security of Tokens

1. Branch Chiefs must submit token purchase requests electronically to the Office of Procurement's Token Forms Mailbox by the 25th calendar day of each month. All token purchases will be made by the Office of Procurement.

2. The Office of Procurement shall distribute approved tokens to Branch Chiefs, or their designees, no later than the 7th calendar day of the month following receipt of valid request documentation from the Branch Chief. Distribution must be documented on the Branch Token Log Form (See Appendix B). A copy of the Branch Token Log Form will be maintained by Procurement and the original returned to the Branch Chief, or designee.

3. Branch Chiefs, or their designees, shall distribute tokens to their respective SCSOs/Program Managers, or their designees, and document the distribution on the Branch Token Log Form. The number of tokens provided to SCSOs/Program Managers should reflect the estimated monthly need in the context of current Team/Program token inventories and approved allocations.

4. The SCSO/Program Manager, or their designees, shall record the tokens received from the Branch Chief and document distribution of tokens to eligible offenders on the Team Token Log Form (see Appendix C).

5. The CSO/Program Manager must ensure offenders are eligible to receive tokens prior to each authorization to distribute. The CSO/Program Manager may follow different steps for providing tokens to offenders deemed eligible:

   A. The CSO must escort offenders to the SCSO, or their designee, who is designated to distribute tokens for the Team.

B. Program Managers may distribute tokens directly to offenders if the Program does not have adequate staff to support a separate role for token distribution.

6. The SCSO/Program Manager, or their designee, shall record each distribution of tokens to the offender on the Team Token Log Form, ensuring that the appropriate purpose code and signatures are obtained on the Form before dispensing the tokens to offender.

7. The CSO/Program Manager must enter the relevant information, including number of tokens provided and purpose code, in SMART using the required format for each offender provided tokens.

8. The Office of Procurement, Branch Chiefs, and SCSOs/Program Managers who distribute or maintain tokens and forms are responsible for securing tokens in a locked safe or cabinet, if available. If neither is available, the Office of Facilities must be contacted through the Facilities Help Desk to obtain the required items to secure tokens prior to the distribution of any tokens.

9. Staff shall not place tokens in an unsecured area (e.g., employee's desk, unlocked cabinet). The staff person who receives the tokens will be held responsible for the theft of any tokens if they have failed to properly secure them. In the event of token theft, the staff person responsible for securing them shall immediately forward an Incident Report to the Office of Security in accordance with CSOSA policy and through the appropriate chain-of-command.

F. Monthly Reporting

1. SCSOs/Program Managers, or their designees, shall complete Team Token Log Forms (see Appendix C) in accordance with the attached instructions. Forms signed by the SCSO/Program Manager must be submitted to the respective Branch Chief, accounting for all prior-month tokens, by the 20th calendar day of each month. Team Token Log Forms must be submitted to the respective Branch Chief each month even if there is no prior-month token activity. Branch Chiefs must review, reconcile and sign all Team Token Log Forms, indicating their approval.

   a. After submitting the signed prior-month Team Token Log Form to the Branch Chief, SCSOs/Program Managers should immediately control and distribute any remaining token balances using a new Form.

2. By the 25th calendar day of each month, Branch Chiefs shall request additional tokens by submitting signed copies of the prior month Branch Token Log Form and all supporting Team Token Log Form(s) electronically to the Office of Procurement's Token Forms

Mailbox. The submitted prior-month Branch Token Log Form must indicate total tokens requested, if any, by the Branch Chief for the next month.

a. Branch Chiefs are responsible for reconciling the Team Token Log Forms for each month with the Branch Token Log Form. Discrepancies between the number of tokens received, distributed and remaining on hand that cannot be resolved must be reported, immediately in writing, by the Branch Chief to the Office of Procurement.

3. The Office of Procurement will review monthly token forms and token requests for accuracy, completeness and reasonableness. The number of tokens approved for distribution by the Office of Procurement must comply with Branch allocation levels approved by the Associate Director of CSS. The Office of Procurement may cancel or postpone distribution of requested tokens based on lack of funds availability, invalid request forms or lack of determined need in context with current token inventories and approved allocation levels. The Office of Procurement will contact the Branch Chief, or designee, when approved monthly token requests are ready for distribution or if there are issues with the request.

G. Requests for Adjustment of Token Allocation

1. To request an adjustment in the approved monthly token allocation level, a Branch Chief shall provide written justification through the chain-of-command to the Associate Director for CSS (or his/her designee) for approval. The request shall include appropriate documentation to support the justification. The Associate Director, or designee, shall notify the Branch Chief and the Office of Procurement of the response to the request within five (5) business days of receipt of the request.

H. Token Audit Process

1. The Office of Financial Management and the Office of Procurement shall perform joint periodic reviews of token distribution processes and balances. At least one review must be completed each fiscal year. The audits will ensure:

a. Token inventories maintained by the Office of Procurement equate to balances carried forward, plus properly documented token purchases made by the Office of Procurement, minus tokens allocated to the Branch Chief level, as documented by signed Branch Token Log Forms;

b. Token allocations from the Branch Chief or their designee to-SCSOs/Program Managers/Teams are documented by signed Branch Token Log Forms;

c. Token inventories are maintained by Teams in a secure, locked location with limited access;

d. Offenders receiving tokens have signed and dated the Team Token Log Form, indicating the date, amount and justification for receipt of tokens. Offenders receiving tokens must be under CSOSA supervision and eligible for participation in the token program;

e. Token distribution must be documented in SMART and note the number of tokens and reasons for distributing token to offender; and

f. Token inventories maintained by each Branch/Team equate to balances carried forward, plus new monthly allocations, minus tokens distributed, as documented by signed Token Log Forms.

2. Audit results attesting to the items listed above must be documented, signed and dated by the Auditor. The Auditor shall provide a copy of the audit results to the Associate Director of CSS and the Associate Director of M&A within thirty (30) business days after the completion of the audit.

APPENDIX B
Branch Token Log Form
(TO BE PLACED ON CSOSA LETTERHEAD)

(1) Distribution Month/Year: _____
(2) Office of Procurement Distributor: _____
(3) Branch Distributed to: _____
(4) Received By (Printed/Signed): _____ (5) Date Received: _____
(6) Balance Forward from Prior Month: _____
(7) Number of New Tokens Received: _____
(8) Total Tokens Available for Distribution: _____

Date	Number Issued to SCSO	Issued By (print)	Rec'd By SCSO Name/Team # (print)	SCSO Signature
		(9) Balance Carried Forward to Next Month		
		(10) New Token Number Requested for Next Month		

(11) New Tokens Requested for Next Month By: _____ **(12)** Date Requested: _____
(Branch Chief's signature indicates that all balances and requests are valid.)

Branch Token Log Form: Used by M&A Procurement and CSS Branch Chiefs to document the receipt new tokens for the current month, distribution of tokens to the SCSO/Team/Program level for the current month and request tokens for the next month.

(Items 1 – 8): To be completed by M&A Procurement and CSS Branch Chief (or designee) at the time of receipt of new tokens for the current month.

(Item 6): "Balance Forward from Prior Month" represents the number of tokens in possession of the Branch as reported in "Balance Carried forward to Next Month" (Item 9) from the prior month's form.

(Item 7): "New Token Number Received" represents the actual number of new tokens received for the current month by the Branch Chief, or designee, from M&A Office of Procurement.

(Item 8): "Total Number Available for Distribution" represents the total number of tokens available at the beginning of the distribution month. It is computed by adding Item 6 plus Item 7.

(**Item 9**): "Balance Carried Forward to Next Month" section represents token balances not distributed to SCSOs/Teams/Programs during the current distribution month.

(**Item 10**): "New Token Number for Next Month" section represents the Branch Chief's token request for the next distribution month.

(**Items 9-12**): To be completed by CSS Branch Chief to request tokens for the next month.

APPENDIX C

Team Token Log Form
(TO BE PLACED ON CSOSA LETTERHEAD)

(1) Distribution Month/Year: _____
(2) Balance Forward from Prior Month : _____
(3) New Token Number Received:_____ (4) Date Received: _____
(5) Total Number Available for Distribution: _____

Date	CSO Name/Initials	Offender Name	PDID#	Tokens Received	Purpose Code(s)[1]	Offender's Signature
(6) Balance Carried Forward to Next Month						

All Information Reported Above is Valid:
(7) Authorized Designee Signature: _____Date Signed: _____
(8) Authorized SCSO/Program Manager Signature: _____Date Signed: _____
(9) Authorized Branch Signature: _____ Date Signed: _____
(*Signature indicates that all balances and requests are valid.)*

Team/Program Token Log Form: Used by the SCSO/Program Manager (or designee) to control distribution of tokens requested by CSOs to eligible offenders. SCSO (or designee) must ensure that token inventory balances correspond to numbers recorded on this Form.

[1] **Purpose Codes:**
A.1.: Seeking Employment
A.2.: Rehabilitation Program
A.3.: Exigent Circumstances
A.4.: Disabled

(Items 1 – 5): To be completed by SCSO/Program Manager (or designee) at the time of receipt of new tokens for the current month.
(Item 2): "Balance Forward from Prior Month" represents the number of tokens in possession of the SCSO/Team/Program as reported in "Balance Carried forward to Next Month" (Item 6) from the prior month's form.
(Item 3): "New Token Number Received" represents the actual number of new tokens received for the current month by the SCSO, or designee, from the Branch Chief.
(Item 5): "Total Number Available for Distribution" represents the total number of tokens available at the beginning of the distribution month. It is computed by adding Item 2 plus Item 3.
(Item 6): "Balance Carried Forward to Next Month" section represents token balances not distributed to eligible offenders during the current distribution month.
(**Items 7 – 8**): To be completed by SCSO/Designee at the end of every Distribution Month prior to submitting Form to the Branch Chief. Signature(s) indicate that all reported balances are valid and documented in SMART.
(Item 9): To be completed by the Branch Chief. Branch Chief must review Team Token Log Forms and forward approved forms to the Office of Procurement's Token Forms Mailbox each month.