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No. 98317-8

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

SHYANNE COLVIN, SHANELL DUNCAN, TERRY KILL, LEONDIS BERRY, and
THEODORE ROOSEVELT RHONE, Petitioners,

v.

JAY INSLEE, Governor of the State of Washington, and STEPHEN SINCLAIR,
Secretary of the Washington State Department of Corrections, Respondents.

**BRIEF OF AMICI CURIAE PIONEER HUMAN SERVICES,
SEATTLE/KING COUNTY COALITION ON HOMELESSNESS,
REVIVE REENTRY HOMES & SERVICES, AND THE STAR
PROJECT IN SUPPORT OF PETITIONERS**

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TABLE OF CONTENTS

I.	IDENTITY AND INTEREST OF AMICI CURIAE.....	1
A.	Pioneer Human Services	1
B.	The Seattle/King County Coalition on Homelessness	2
C.	Revive Reentry Homes & Services.....	3
D.	The STAR Project.....	3
II.	INTRODUCTION	5
III.	ISSUES PRESENTED.....	7
IV.	STATEMENT OF THE CASE.....	7
V.	ARGUMENT	8
A.	There can be sufficient resources available to assist with the re-entry into the community of those released.	9
B.	Redistribution of resources to facilitate re-entry is more economically prudent for the community.....	13
VI.	CONCLUSION.....	15

I. IDENTITY AND INTEREST OF AMICI CURIAE

A. Pioneer Human Services

Pioneer Human Services (“Pioneer”), a Seattle-based nonprofit organization, is the oldest and largest reentry services provider in Washington. Since 1963, Pioneer Human Services has specialized in working with justice-involved individuals to build healthy, productive lives in our communities. Offering a comprehensive range of housing, employment, training, treatment, and transition services, Pioneer is the oldest and largest provider of reentry services in Washington providing more than 10,000 people a year with the tools and skills they need to build healthier, happier lives.

In addition to providing direct services, Pioneer advocates for legal and policy changes promoting the rights of people reentering the community and fights policies and practices that continue to punish people after they complete their sentences. A significant and disproportionate number of the people whom Pioneer serves are people of color.

Like most service providers, Pioneer has seen a sharp increase in demand for its services as a result of the COVID-19 pandemic, and its capacity to meet that growing need is limited. That said, Pioneer is committed to supporting people released from prison and encourages Respondents to not only expand the number of people who are released due

to COVID-19, but also to adequately fund programs that are designed to meet the specific needs of those releasing. Pioneer welcomes opportunities to partner on these types of projects. Pioneer further encourages Respondents to redirect dollars that are currently spent to incarcerate people to reentry services designed to help people achieve long-term success in our communities. Community-based services are more cost-effective and consistently produce better outcomes than incarceration.

B. The Seattle/King County Coalition on Homelessness

The Seattle/King County Coalition on Homelessness (SKCCH) is a nonprofit organization begun in 1979 and incorporated as a 501c3 in 2017. The Coalition offers education, advocacy, and public policy work rooted in the knowledge of its members. Coalition member organizations provide direct services to support people without homes, including formerly justice-involved individuals reentering their communities. Members include agencies and community groups that provide shelter and other survival services; education and employment services; social and behavioral health services; and housing for adults and children in King County. Members also include people who were or are homeless, local government departments, public housing authorities, professional associations, religious congregations and social action committees, and advocacy groups. The

Coalition envisions a region that acts on a shared sense of responsibility to ensure that everyone has a home.

C. Revive Reentry Homes & Services

Established in 2015, Revive Reentry Home & Services provides peer and family support to formerly justice-involved individuals in Spokane. In addition, Revive provides foundational community supports (FCS), supported employment and supportive housing for eligible Medicaid recipients and supports individuals through the reentry process by providing case management to help people obtain basic needs and, eventually, employment. Revive also has seven transitional homes that their FCS case managers work within. Revive was formed by three formerly incarcerated community members, Layne Pavey, Bill Keizer and Dom Felix, who wanted to help others get through the sometimes grueling and often intimidating process of reentry. The founders walked the same path just a short time ago that those released will embark upon, and they seek to share their successful navigation of the journey with those about to begin it, helping bring them back to life. Revive's program is based on peer support, encouragement, and working with community partners to find the right resources to help those reentering society to hold up their heads high.

D. The STAR Project

The STAR Project provides rural reentry services in Walla Walla County in Washington State. STAR provides services to approximately 150 individuals each year in the following programs: pre-release transition, comprehensive case management, housing, employment, and education.

STAR clients are provided reentry services during incarceration, immediately upon release, and/or after attempting to rejoin the community of Walla Walla. STAR coordinates client services with the local Department of Corrections Field Supervision Office, Washington State Penitentiary, and Walla Walla County Jail. For services not offered in-house, such as mental health and substance use disorder treatment, STAR closely coordinates with local services providers.

COVID-19 has brought a variety of challenges to the field of reentry. As institutions make decisions to release justice-involved individuals in response to the pandemic, reentry services are more vital than ever. STAR supports the early release of qualifying individuals and stands ready to serve those who return to the community of Walla Walla. STAR urges Respondents to consider using funds otherwise designated for incarceration to be redirected to reentry service providers. Reentry services are shown to improve long-term outcomes for justice-involved individuals and reduce the overall cost of the criminal justice system. A well-funded,

robust network of reentry services is a vital component in ensuring the safety and security of our communities during the COVID-19 pandemic

II. INTRODUCTION

As Nelson Mandela observed, “no one truly knows a nation until one has been inside its jails. A nation should not be judged by how it treats its highest citizens, but its lowest ones.”¹ And how Washington treats those inside its prison during a deadly pandemic will be quite telling.

COVID-19 is a particularly virulent, highly contagious, and potentially fatal infectious disease that has entered Washington’s prisons as it has the rest of the state. Having infected thousands of Washingtonians, COVID-19 is seen as such a threat to human life and health that Governor Jay Inslee proclaimed a State of Emergency on February 29, 2020,² and subsequently issued a “Stay Home - Stay Healthy” order (Order) on March 23, 2020.³ In his address announcing the Order, Governor Inslee stated: “We all just need to practice social distancing of six feet to protect ourselves and others — everywhere, all the time.”⁴ But it is simply impossible to

¹ *Long Walk to Freedom*, Nelson Mandela, 1995.

² <https://www.governor.wa.gov/sites/default/files/proclamations/20-05%20Coronavirus%20%28final%29.pdf>

³ <https://www.governor.wa.gov/sites/default/files/proclamations/20-25%20Coronavirus%20Stay%20Safe-Stay%20Healthy%20%28tmp%29%20%28002%29.pdf>

⁴ March 24, 2020 "Stay Home, Stay Healthy" address transcript, *available at* <https://www.governor.wa.gov/news-media/stay-home-stay-healthy-address-transcript>.

practice social distancing in the extremely close confines of prison cells. As the Governor admits in his April 15, 2020, Proclamation, “current statutory barriers limit the Department’s ability to respond swiftly to the COVID-19 emergency, including the ability to achieve safe distancing for individuals incarcerated in correctional facilities.”⁵ Prisons amplify infectious diseases.

Governor Inslee also called upon the people of Washington to “be...compassionate...”⁶ In the case of the highly medically vulnerable population and those who have nearly finished repaying their debt to society that Petitioners seek to have released, compassion demands urgent, effective action to save them from the predictable and, more importantly, *preventable* carceral death or serious illness that likely awaits them should they contract the virus as it relentlessly spreads through the facilities in which they are currently held. If the spread of the virus at the Cook County jail in Illinois — one of the nation’s largest where the virus spread exploded from two inmates to over 350 in just over two weeks⁷ — is any indication of what is to come in Washington’s prison, immediate action is needed. The virus will not be contained by prison walls.

⁵ <https://www.governor.wa.gov/sites/default/files/proclamations/20-50%20-%20COVID-19%20Reducing%20Prison%20Population.pdf>.

⁶ *Id.*

⁷ <https://www.nytimes.com/2020/04/08/us/coronavirus-cook-county-jail-chicago.html>
[Need proper cite]

Although lower than that of other states in this country, Washington's incarceration rate is *higher than every single founding NATO country* except for the United States itself.⁸ This would remain true even if the state released the individuals identified by Petitioners. Compassionate release is both possible and necessary to protect not only the incarcerated but also prison staff and the community at large.

III. ISSUES PRESENTED

Whether the State can fulfill its duty to protect the health and safety of all Washingtonians through the depopulation and release sought by Petitioners.

IV. STATEMENT OF THE CASE

The State of Washington is in a State of Emergency due to the COVID-19 pandemic. Washingtonians have been ordered by Governor Inslee to stay at home and to practice social distancing. Unfortunately, there remains one group in Washington State for which social distancing is currently impossible: people in the custody of the Department of Corrections (DOC). COVID-19 has arrived in the prisons, and immediate action must be taken to prevent it from spreading like wildfire in the close confines of prison facilities.

⁸ Prison Policy Initiative, *Washington Profile*, <https://www.prisonpolicy.org/profiles/WA.html>

Petitioners request that they, as well as all vulnerable people – those who are over age 50, those with certain serious medical conditions, who are pregnant, or have compromised immune systems – and other people within 18 months of their release date and those who are currently on work release be released from confinement. Petitioners’ Brief in Support of Petition at 4. With coordination with non-profits such as amici, the release of these individuals can be accomplished in a manner that will benefit both the individuals, their families, and the communities to which they will return,

V. ARGUMENT

In 2016, Governor Inslee launched the Statewide Reentry Council (“Reentry Council” or “Council”), tasking it with “develop[ing] collaborative and cooperative relationships between the criminal justice system, victims and their families, impacted individuals and their families, and service providers[.]” In its December 2018 Report of the Statewide Reentry Council (“Reentry Council Report”), the Council stated that:

...proposals that promote and invest in successful reentry outcomes [] will reduce the cost of incarceration and eliminate the need to build additional prisons in Washington. Investing in reentry practices and policies that promote successful reintegration for people returning from Washington jails and prisons increases public safety by decreasing the likelihood of further criminal conduct.⁹

⁹ December 2018 Report of the Statewide Reentry Council, at 1 *available at* <https://www.commerce.wa.gov/wp-content/uploads/2013/01/1-2-2019-CSHD-Commerce-Reentry-Report-2018.pdf>.

Substantial reduction of the prison population is a must to control against the spread of COVID-19 and protect those in prison who are most vulnerable to exposure to the virus. The Governor and DOC, in partnership with community organizations such as amici, can build on already-existing relationships to immediately develop plans to effectively assist those who will be returning to communities around the State due to COVID-19. With the proper collaboration and allocation of resources, amici and other reentry-focused organizations have the experience and expertise to be nimble and effectively respond to the release of people in prison that the Petitioners request.

A. There can be sufficient resources available to assist with the re-entry into the community of those released.

As Governor Inslee has noted, “These are unprecedented times and we continue to make necessary adjustments to help Washingtonians.”¹⁰ The Governor has had to take “unprecedented steps ... to protect Washingtonians.”¹¹ The Department of Corrections has demonstrated that it can pivot to make necessary changes to address the health crisis as well, recently implementing rapid reentry transfers and easing the transition by

¹⁰ <https://www.governor.wa.gov/news-media/inslee-signs-additional-measures-help-mitigate-covid-impacts>.

¹¹ <https://www.governor.wa.gov/news-media/stay-home-stay-healthy-address-transcript>.

expediting access to public benefits for incarcerated individuals.¹² The State has been and must continue to think creatively to expedite reentry and to work with the myriad of community organizations that provide services to those reentering from the prison system.

In addition to organizations like Pioneer, SKCCH, Revive, and the STAR Project, a review of the ILS Reentry wiki (a resource provided by the Institutional Library Services, a Washington State Library program) reveals that there are numerous other community organizations as well as statewide and national resources providing a wide range of services from housing to employment and education to health and government assistance for formerly justice-involved individuals upon reentry. *See* https://wiki.sos.wa.gov/ILSRe-entry/index.php?title=Main_Page.

Organizations such as Pioneer, SKCCH, Revive, and the STAR Project, Amici and other reentry service providers have all continued operations during this pandemic and continue to serve individuals being released from prison. These organizations and others that provide reentry services have already started preparing the changes that have occurred due to COVID-19. For example, Pioneer Human Services, in response to the COVID-19 pandemic, quickly recognized that the most vulnerable in our communities

¹² <https://doc.wa.gov/news/2020/docs/2020-0415-expedited-access-to-public-benefits-for-rapid-reentry.pdf>.

will bear a disproportionate burden of harm due to the pandemic. As such, they set up a COVID-19 relief fund to assist clients with rental assistance, food provisions, medical costs, and more. Furthermore, Pioneer's leadership team has agreed to match any gift up to \$10,000.¹³ Likewise, SKCCH quickly mobilized so it could quickly respond to the impact COVID-19 is having on people who are homeless, including launching a solidarity fund to assist this population.¹⁴

Many of the services necessary for return to the community are already provided by amici and other organizations. For example, Pioneer, Revive, and the STAR Project provide individualized case management services to people in Washington, which includes referrals to housing and employment services, and assistance with addressing clients' access to health care services. These organizations are willing to work in partnership with Defendants to come up with potential solutions for concerns they may have with the early release of inmates.

Amici recognize that the reentry work will be challenging, and resources will need to be creatively reapportioned by DOC and the organizations that provide supportive reentry services. However, this is

¹³ <https://pioneerhumanservices.org/about/news-events/donate-today-pioneer-human-services-covid-19-relief-fund>

¹⁴ <http://homelessinfo.org/>

difficult and challenging work under normal circumstances. But it can be done. As Revive Reentry notes on its website, “We won’t tell you it will be easy, but we will tell you it is possible to be successful with a prepared mindset and a little help from your friends.”¹⁵

Amici and others would not be in this line of work if it was not challenging. For years, many reentry organizations have been operating on shoestring budgets and constantly adjusting to increase capacity. Yet, this has not prevented these organizations from assisting thousands of people each year with successful reentry to their communities, which in turn contributes to the general health and safety of those communities.

Furthermore, life generally for most every person in our community has been challenging over the last several months; but collectively, Washingtonians have risen to the challenge and successfully adapted. Collectively, we are doing things we did not think were possible mere weeks ago.

Finally, while there may be some challenges ahead, the Department of Corrections is in the business of releasing inmates — releasing 8,178 individuals in fiscal year 2019 alone.¹⁶ And the alternative of continued

¹⁵ <https://revivereentry.com/>

¹⁶ <https://www.doc.wa.gov/docs/publications/reports/200-RE001.pdf>

incarceration with potential widespread casualties in the prison population is simply unacceptable.

B. Redistribution of resources to facilitate re-entry is more economically prudent for the community.

According to the Reentry Council Report, the Department of Corrections was allotted approximately \$1.9 billion in the 2015-17 biennial budget, or roughly \$950 million annually.¹⁷ The average annual cost of incarcerating a person in 2018 was \$38,946 per person.”¹⁸ Factoring in the cost of medical care for inmates that will contract COVID-19 will only increase the average cost per incarcerated person.

In comparison, in 2018 alone, amicus Pioneer Human Services served 8,697 individuals with a revenue of \$82,793,598, at an average cost of \$9,519.78 per person.¹⁹ This represents a savings of approximately \$29,426 per person. If a portion of state and federal funds were redistributed to or earmarked for community organizations helping with the re-entry of formerly justice-involved individuals, they could increase their capacity to provide services at large savings.²⁰

¹⁷ Reentry Council Report at 6.

¹⁸ *Id.*

¹⁹ Pioneer Human Services 2018 Annual Report at 14, *available at* https://pioneerhumanservices.org/sites/default/files/reports/phs2018_annual_report_072519_1.pdf.

²⁰ For example, the Washington State Legislature appropriated \$492,000 for FY 2021 to establish and operate a statewide reentry legal aid project. <https://ocla.wa.gov/wp-content/uploads/2020/04/Notice-of-Funds-Availability-FINAL-4-13-2020.pdf>.

Further, comprehensive re-entry services lower recidivism rates. Not only would funds redistributed to re-entry be able to help more people at lower cost, they would save more money by preventing future incarceration. For example: In a program in Colorado that directed financial grants to comprehensive, community-based re-entry services, only 2.5% of program participants who were formerly incarcerated committed a new crime within the program's first two years.²¹ Likewise, money invested in re-entry often yields generous returns. A 2013 cost-benefit analysis of the Minnesota Comprehensive Offender Reentry Program found that that program yielded a return of \$1.80 for every \$1.00 spent on the project, a savings of over \$1.8 million.²²

To fully meet the needs of people being released from DOC custody, however, the State must devote resources to achieve successful reentry. The State cannot fulfill its duty to ensure the health and safety of people in its custody and their communities by simply relying on nonprofit service organizations, such as homeless shelters, to fill the gap. These resources are already stretched thin even in normal times. Thus, particularly in this current environment, it is important that the State ensure that release is

²¹ https://www.urban.org/sites/default/files/publication/96341/investing_justice_resources_to_address_community_needs.pdf

²² <https://crimesolutions.gov/ProgramDetails.aspx?ID=486>

accomplished with continuing health of the people it is releasing – for example, by ensuring screening and adequate facilities for isolation, if needed, and other health care. Again, while these resources will require investment, the State can and has shown it can respond in the nimble and dramatic ways called for by the pandemic.

Redistributing resources to facilitate re-entry will only increase service providers' capacity to reduce the costs of incarceration and help stabilize people reentering the community from DOC custody.

VI. CONCLUSION

For the foregoing reasons, Amici respectfully submit that increasing the rate of reentry at this particular time in history is not only the compassionate and humane response but also one that will protect both the formerly incarcerated individuals as well as the community as a whole while being fiscally responsible.

DATED this 16th day of April, 2020.

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A handwritten signature in cursive script, appearing to read "Sara Amies".

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I certify that on the date below, I electronically filed Motion for Leave to File Briefs of Amici Curiae:

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