

Recidivism and Reintegration: Barriers Facing Ex-Offenders of Color in Employment

Bethanie R. Quarton

Milligan University

COMP 211

Dr. Hoover

9 November 2020

Abstract

Studies have found that job placement is a great way to combat recidivism, but for many ex-offenders finding work can be difficult. Despite job training and placement programs, many ex-offenders are rejected by companies because of their criminal record. For ex-offenders of color, this problem is exacerbated by racial discrimination. One study found that companies responded more positively to white applicants with a drug felony than to black applicants with the same charge. The existing policies need to change to further protect ex-offenders and racial minorities. In this paper, I will examine models for legislation and work environments that will give ex-offenders an equal chance in the workplace. This will include current or potential legislation that could be passed, as well as incentives for businesses to hire ex-offenders. I will be investigating current hiring practices that exclude ex-offenders from the workplace and looking at how they can be reformed.

Key Words: Ex-offender, racial minorities, barriers to employment, second-class citizen, and employment

Unemployment is a daunting prospect for many, especially during a pandemic. When the economy abruptly shut down, many were left wondering about their jobs. The U.S. saw an increase in the unemployment rate to 14.4% due to the pandemic, creating turmoil and instability for many (Kochhar, 2020). Ex-offenders are well-acquainted with the problems stemming from unemployment. Many ex-offenders are unable to find work despite education, job training, and placement programs. The unemployment rate for ex-offenders is “27% — [which is] higher than the total U.S. unemployment rate during any historical period, including the Great Depression” (Couloute & Kopf, 2018). This high rate is not the result of a sudden pandemic but rather exclusionary hiring practices and policies targeting ex-offenders. Many companies conduct background checks on potential employees due to safety and liability concerns. While this may appear to be a good thing, it bars many ex-offenders from the workplace. Employment is crucial in preventing recidivism, or the tendency to reoffend, and reincarceration (NAACP, 2018). It is necessary that ex-offenders receive an equal chance in the job market. However, this is still not happening in the workplace, and ex-offenders of color suffer the ramifications more so than anyone. Formerly incarcerated Black men and women experience unemployment rates of 35% and 43%, respectively (Couloute & Kopf, 2018). These rates are considerably higher than the general unemployment rate of 27%, suggesting that black ex-offenders experience discrimination beyond that of other ex-offenders. They face discrimination due to their criminal record as well as their race. While racial discrimination in the workplace is illegal, discrimination against ex-offenders is not. Employers can buy, view, and flag the criminal records of potential employees before the hiring process really begins. This disconnect means that racial discrimination can exist within the bounds of ex-offender filtration. With criminal records readily available through background checking companies and public databases, the focus of the employer needs to shift.

To prevent discrimination against ex-offenders of color in the workplace, hiring practices need less weight placed on the ex-offender status and more of a focus on qualifications.

The historic exclusion of ex-offenders continues to be an issue in the United States. Exclusion of ex-offenders in the workplace is not a new phenomenon. Over centuries, cultures continually excluded or banished those who were labeled criminals. England's use of Australia as a penal colony is a prime example of the exclusion and stigma that ex-offenders have faced. These criminals were completely ostracized by their communities, a concept not unfamiliar to ex-offenders in the United States. Today's U.S. offenders face exclusion through "disqualifications for voting and political participation, firearms ownership, adoption, occupational licensing, social welfare benefits, and immigration status" (Jacobs, 2015, p. 241). Because the U.S. has the highest incarceration rate in the world, these limitations affect millions of people, with an overwhelming majority being people of color ("Ranking: Most Prisoners Per Capita By Country 2020," 2020). This majority is due largely to a change in policing tactics and harsher policies. While incarceration used to be intended for those who committed violent or "heinous" crimes, it has been "extended to a much greater range of crimes and a much larger segment of the population" (Pager, 2003, p. 938). This extension can be seen clearly in President Reagan's War on Drugs campaign. This campaign was intended to address the United States' issue of drug abuse, doing so through harsher policing and sentences for those suspected and convicted of drug felonies. However, this strategy did little to combat drug use. Rather, it "enabled racially biased policing and drug operations in communities of color, which resulted in the disproportionate arrest, conviction, and sentencing of people of color" (Abrams, L., & Lea C., 2020, p. 220). People of color became associated with drugs and crime, leading to higher rates of arrest. The tactics implemented in Reagan's War on Drugs have not been significantly

modified today. In fact, a 2017 study found that “15 percent of the entire U.S. Black adult male population had been to prison and 33 percent of the U.S. Black adult male population lives with a felony criminal record” (Lindsay, 2020, p. 116). People of color are still being arrested and incarcerated at higher rates than white people, and “the disproportionate growth of criminal justice intervention in the lives of young black men, compounded by skewed media coverage of this phenomenon, has likely played an important role” (Pager, 2008, p. 73). The limitations of forfeited voting rights and other disqualifications imposed on ex-offenders are felt even more by ex-offenders of color. Many employment options are unavailable to ex-offenders, but even more employers are reluctant to hire those with a criminal record. Without federal guidelines or policies in place, ex-offenders will continue to experience discrimination in hiring practices.

Employers discriminate against ex-offenders of color because of their status as well as their race. While racial discrimination against job applicants is illegal, businesses can filter applicants based on criminal history. In fact, federal and state law mandate that records must be released to certain businesses and organizations (Jacobs, 2015, p. 204). Other businesses or organizations can easily purchase criminal records from databases that compile lists of criminal records. The access to background checks hurts applicants’ chances of making it to the interview process, which means that they are unlikely to be able to explain their record or answer any questions. In Devah Pager’s study, two pairs of college students were assigned fake resumes and criminal backgrounds. The two pairs consisted of two white, male students and two black, male students. Their resumes were essentially identical except for the fact that one student from each group was assigned a felony drug conviction. After sending these applications to 350 businesses in the Milwaukee area, “34% of whites without criminal records [received] callbacks, relative to only 17% of whites with criminal records” (Pager, 2003, p. 955). However, the black applicant

without a criminal record had a 14% callback rate, while the black applicant with a criminal record had a 5% rate (Pager, 2003, p. 957). This study reveals not only the bias against ex-offenders, but specifically people of color. The white applicant *with* a criminal record had a higher callback rate than the black applicant without one. The black ex-offender's callback rate was the lowest by a significant margin. This study shows the monumental impact race continues to have in the hiring process, as well as the compound effect of race and a criminal record. Preemptive screening led to discrimination against ex-offenders of color "regardless of whether the practices were driven by prejudice and regardless of whether the managers, directors, or employees following the norms are themselves racially prejudiced" (Small & Pager, 2020, p. 53). Employers considered the criminal record more for the black candidates than the white candidates since "the ratio of callbacks for nonoffenders relative to ex-offenders for whites is 2:1, this same ratio for blacks is nearly 3:1. [...] A criminal record is thus 40% [more damaging] for blacks than for whites" (Pager, 2003, p. 959). Pager and others have repeated this study in cities across the U.S., from New York City to Chicago, and the results come out the same in every place. The unwillingness of employers to call back let alone hire ex-offenders of color mean that those ex-offenders face severely limited employment options.

Racial stereotypes and portrayal contribute greatly to the high unemployment rates of ex-offenders of color. A common concern of employers is liability. This is especially true when they consider hiring ex-offenders, as that leaves them vulnerable to "potential liability for negligent hiring" (Paul-Emile, 2014, p. 919). It makes sense then that employers, unless incentivized otherwise, would rather hire someone without a criminal record. However practical this is for business, it disadvantages an entire population of ex-offenders. Employers' unwillingness to hire ex-offenders of color may come from another source. Media-enforced stereotypes of African

Americans as “violent or crime-prone are among the most salient dimensions of contemporary stereotypes about African Americans” (Pager, 2008, p. 82). Black ex-offenders must deal with the stigma of a criminal record as well as the wide held view that African Americans are “crime-prone.” If employers hold this view when deciding on applicants, ex-offenders of color are even less likely to be hired than white ex-offenders. These racial stereotypes are detrimental to ex-offenders of color finding employment.

Many reentry barriers facing ex-offenders directly limit their job options, even before applying. Reintegrating into society is the goal for most ex-offenders after prison. However, reentry is made more difficult by “institutional and systemic biases” (hidden sentences) such as “substandard education, pay inequities, and the spatial mismatch of jobs and housing” (Blessett, 2013, p. 437). These biases are often government-regulated and are difficult for ex-offenders to overcome. One such example of pay inequities for ex-offenders is in the testimony of Lawrence Kelly. While in college, Kelly resorted to selling drugs to make money. He was arrested, spent a short time in jail, and then returned to college to finish school. Kelly continued on to receive his doctorate, but found himself only in a “position [that] yielded [him] a stipend of \$75 per week, in exchange for a 40-[hour] work week” (Kelly, 2010, p. 494). Even though Kelly was overqualified for his position, he was not making nearly enough to support his life in New Jersey/New York. His criminal record prevented him from finding employment that would support him, despite his qualifications. Kelly’s level of education, however, is an outlier for many ex-offenders, specifically those of color. In fact, many of the “hidden sentences” have a harsher effect on black ex-offenders (Warner et. al, 2020, p. 147). Many ex-offenders of color have a high school degree level of education or lower, but many “jobs often require skills or at least credentials beyond a high school diploma or equivalent” (Lindsay, 2020, p. 117). This

disparity between the skills of ex-offenders of color and the requirements for jobs places ex-offenders of color at a significant disadvantage in the workforce. While there are programs within prisons that offer job training or education, “poor access to prison programs and low levels of motivation to participate among incarcerated people most at risk limit the potential effectiveness of prison programs” (Lindsay, 2020, p. 116). Cuts to educational programs within prisons are felt by millions of incarcerated persons as only 35% of state prisons in the U.S. report offering college courses to inmates (Delaney et al., 2016, p. 7). This worsens many ex-offenders chances of employment upon reentry. In fact, ex-offenders who have completed educational courses while incarcerated have a “13 percent higher chance of obtaining employment post-release” (Delaney et al., 2016, p. 10). Without the access to training and education, ex-offenders of color are at risk of recidivism.

Like education, ex-offenders are also discriminated against in housing searches. While this may not seem like a limitation on employment, it is a great barrier to many ex-offenders of color. The conditions of many urban environments mean that they are “uniquely incapable of accommodating ex-offenders or proactively supporting their reintegration into society” (Blessett, 2013, p. 436). If the environments that ex-offenders of color are reintegrating into are unable to support them, these ex-offenders must search for either new environments or stay where they are without adequate support. Because ex-offenders are barred from government housing and discriminated against in other forms of housing, moving is not always an option. This means that ex-offenders have limited housing and therefore employment options to choose from. In addition, many job applications require applicants to list a permanent address. For ex-offenders, finding a permanent address is much harder because of housing restrictions. Without a permanent address, ex-offenders face further limitations on potential employment. Limited

housing, education, and pay inequities result in extra barriers for ex-offenders to overcome in the employment process.

Programs to help ex-offenders obtain employment are already being considered and implemented around the country. One of the most common strategies is reentry programs. These programs are being implemented in lower socioeconomic neighborhoods and urban areas to help ex-offenders of color specifically. One such program in Los Angeles was studied to see how instructors of color at these programs prepare the ex-offenders for the harsh job search. The researchers found that while there were some voluntary participants in the program, most “participants are required to enroll and attend the program daily as a condition of their parole or probation plans” (Abrams & Lea, 2016, p. 222). Because the class is mandatory for many ex-offenders, it has a better chance of reaching high numbers of ex-offenders. Training and reintegration programs can greatly help ex-offenders in their job search. In addition, this program serves and employs African Americans and Hispanics (95% and 5% of participants, instructors, etc.) (Abrams & Lea, 2016, p. 223). The program instructors work to create strategies and exercises for the ex-offenders to better prepare them for restricted employment opportunities. Education and training programs inside of prisons, while offering the ex-offender many useful skills, has also been found to be cost-effective. These programs “In comparison to the direct costs of re-incarceration, [offer] an estimated 400 percent return on investment for taxpayers over three years, or \$5 saved for every \$1 spent” (Delaney et al., 2016, p. 11). It is less costly for the state to provide educational programs in prisons than it is to re-incarcerate an ex-offender. Programs targeting ex-offenders of color help to give this population a better chance at reintegrating.

Not only have programs been developed to help with reintegration, but some policies have been created to help ex-offenders secure jobs. When the rights and opportunities of U.S. ex-offenders are compared to that of many European ex-offenders, it is evident that the U.S. can do more for this population. In many European countries, “employers, landlords, and voluntary associations may not obtain criminal history information from the NCR or from courts” (Jacobs, 2015, p. 160). While the U.S. does not have any policies of quite this magnitude, the Ban the Box movement pushes for similar confidentiality. The name Ban the Box comes from the movement’s desire to remove the box on applications asking about a criminal history. This movement mandates companies withhold questions about criminal records until later in the hiring process. Ban the Box has been implemented in 35 states in the U.S. when hiring in the public sector (Avery & Lu, 2020). This policy gives ex-offenders the chance to create a good impression with employers before explaining any arrests or convictions. While it is not as enforced in private sector companies, Ban the Box has migrated into some companies’ policies. Retailer-giant Target voluntarily implemented Ban the Box in its hiring practices (Jacobs, 2015, p. 297). Delayed questioning is also the goal of the “Fair Chance to Compete for Jobs Act of 2019.” This Act, which will go into effect in December 2021, “[prohibits] most federal agencies and contractors from requesting information on a job applicant’s arrest and conviction record until after conditionally offering the job to the applicant” (Avery & Lu, 2020). This is a necessary step forward that will help to emphasize relevance of an arrest/conviction rather than just the charge itself. Companies will be forced to weigh qualifications and interview performances against any criminal record. While this act does not make it illegal to discriminate against ex-offenders, it is a step in the right direction.

The action currently being taken is important but searching for solutions that aid ex-offenders of color in job searches is still a necessary step. Numerous models and policies already exist that can be extended or modified to meet these needs. Advocate Kimani Paul-Emile writes about the possibility of building policies for ex-offender protection off a Health Law framework. A crucial part of Paul-Emile's framework revolves around employment protection for those with disabilities. Paul-Emile advocates for a system that allows employers to ask about criminal history during interviews, but "then, as under Title VII, [...] must demonstrate that the exclusionary criteria are job-related and consistent with business necessity" (Paul-Emile, 2014, p. 937). Essentially, this takes the Fair Chance to Compete for Jobs Act of 2019 further by mandating that the conviction/arrest would directly correlate to poor job performance. An example of this could be a trucking company denying employment to someone with a history of drunk driving. While there is still room for denial, this framework mandates that the criminal history must be relevant. With emphasis being placed on relevant convictions, it protects ex-offenders of color from being discriminated against because of a stop-and-frisk incident or arrests without a conviction (Paul-Emile, 2014, p. 932). A Health Law approach in conjunction with the Ban the Box movement and the Fair Chance to Compete for Jobs Act would provide ex-offenders of color with a greater chance of employment.

Restricting background checks until a later part of the hiring process means that more needs to be done to regulate rap sheets and criminal histories. Background checking companies are most used by employers when performing background checks on potential employees. However, these companies obtain records and then sell them, meaning that "criminal history reports are riddled with errors and frequently contain significant inaccuracies, including false positive identifications, sealed or expunged information, misleading information, and missing

case disposition or resolution information” (Paul-Emile, 2014, p. 907). For ex-offenders, this can lead to confusion or a rescinded job offer. Regulating these companies would further eliminate inaccuracies from criminal records, as well as make records easier to understand. Alleviating any confusion or inaccuracies in criminal records requires that they “be redesigned to be more user-friendly and they should provide more information about the charges than a bare notation of ‘assault’ or ‘theft.’” (Jacobs, 2015, p. 308). Giving more information, including the result of an arrest, about charges on criminal records will help employers to make an informed decision as well as avoid discrimination. Because ex-offenders of color are more likely to be arrested for “curfew violations, disorderly conduct, false alarms, minor traffic violations, and loitering,” explanation within the criminal record itself could reduce discrimination (Paul-Emile, 2014, p. 940). The regulation of these records could allow ex-offenders of color to get further in the hiring process.

In addition to direct employment discrimination, more needs to be done to ensure that ex-offenders can obtain the skills and licenses they need while in prison and reentry programs. For ex-offenders trying to find work, it can be difficult to compete with other applicants because of the gap in work history and lack of marketable skills. Programs in prisons and reentry programs need to be expanded instead of eliminated so that more ex-offenders have access to them. These programs are crucial for developing trade skills, as well as “hard skills like typing and soft skills such as communication and teamwork, which are necessary to be competitive in the labor market” (Lindsay, 2020, p. 121). For ex-offenders of color, these skills become even more crucial in offsetting the biases of both race and status. There should also be more emphasis placed on creating effective and worthwhile programs. Seeing as these skills are necessary for ex-offenders entering the workplace, there should be a focus on “[funding] projects or [hiring]

researchers to conduct longitudinal evaluations that compare and identify prison programs that positively affect post-prison employment chances” (Lindsay, 2020, p. 122). Investing in programs that increase employment chances for ex-offenders will create a smoother transition for them. This is especially true of ex-offenders of color who may be returning to environments not equipped to support their reentry. One such program that could help is a wider implementation of the Safer Foundation. The Safer Foundation, based in Chicago, provides education and job skills for ex-offenders and then places them “with willing employers to whom the applicant’s full criminal record is disclosed” (Jacobs, 2015, p. 312). The Safer Foundation works closely with businesses in Chicago to line up job offers for ex-offenders. More programs like the Safer Foundation would provide ex-offenders the opportunity to enter the workforce and create connections and a positive reputation.

To get more employers to consider hiring ex-offenders, incentives could be provided through tax breaks or insurance. Many employers avoid hiring ex-offenders because they are wary of liability, “including the costs that may be incurred as a result of litigation based on a negligent hiring or negligent retention claim, [...] if an employee were to engage in criminal activity at work (such as theft, fraud, or violence)” (Paul-Emile, 2014, 944). By providing monetary incentives, employers would be more willing to take on the perceived risk of hiring an ex-offender. This could be done through insurance provided in case the ex-offender did engage in criminal activity while at work. It would make employers feel more comfortable hiring ex-offenders if the threats of a lawsuit or loss of assets were not present. There could be wage or benefit requirements built into the insurance policy to ensure that businesses do not take advantage of ex-offenders (Lindsay, 2020, p.122). This insurance could be provided by eliminating negligent hiring policies. Eliminating these policies would mean that businesses

could not be sued because of the acts of an ex-offender that they hired. Rather, they would have the same accountability for ex-offenders and non-offending employees. Requirements helping ex-offenders could also be implemented in a tax break or credit. The Work Opportunity Tax Credit is a current incentive that “gives tax credits to businesses that hire groups with traditionally high unemployment rates, including people with felony records” (Lindsay, 2020, p. 116). Because black ex-offenders have some of the highest unemployment rates, this incentive could be crucial to increasing their employment opportunities (Couloute & Kopf, 2018). This tax credit does need some modification to further help ex-offenders of color. One of the glaring issues is the Work Opportunity Tax Credit has only been extended to December of 2020 (“Work Opportunity Tax Credit”). Without an extension, this credit will no longer be available for businesses. This extension is crucial to the future employment of ex-offenders of color because it offers businesses an incentive to hire ex-offenders. If an extension is granted, the requirements to qualify for the tax credit must be amended. Employers can only use these tax credits for “those who are hired within one year of their conviction or release from prison” (Lindsay, 2020, p. 122). To encourage further hiring of ex-offenders, this time limit should be suspended. By incentivizing businesses to hire ex-offenders and other groups with high unemployment rates, ex-offenders of color would gain much needed employment options.

Creating a system that values qualifications and skills over a criminal history will allow greater employment opportunity for ex-offenders of color. Placing value on the individual’s skillset and experience will reduce the stigma of a criminal record. Giving ex-offenders a chance to reenter the workforce fairly will allow them to reintegrate and support themselves. Without action, ex-offenders will continue to face injustice and discrimination that is counterintuitive to a successful reentry. Ex-offenders should be able to move past their mistakes into a society that is

ready to receive them. Moving forward, there must be a deliberate effort to help ex-offenders of color reenter society. Programs that assist them with education, job training, and finding employment are crucial in making sure that this population is not overlooked. Along with this, policies and legislation need to protect and advocate for this group. Giving ex-offenders these tools will enable them to forge a fresh start and create a more stable life. Stability and a successful reentry could contribute to lessening the stigma surrounding ex-offenders and their job performance. If discrimination against ex-offenders is no longer accepted, it no longer offers a space for racial discrimination to legally occur. Ex-offenders of color could be considered for their skills without the looming threat of discriminatory hiring practices. Progress for ex-offenders of color hinges on ignoring stereotypes and embracing an inclusive workplace.

References

- Abrams, L., & Lea C. (2016). "From Ex-Offender to New Contributor: An Examination of How a Community-Based Reentry Program Addresses Racial Barriers to Employment." *The Voluntary Sector in Prisons*, 215-244,
https://www.researchgate.net/publication/303542547_From_Ex-Offender_to_New_Contributor_An_Examination_of_How_a_Community-Based_Reentry_Program_Addresses_Racial_Barriers_to_Employment
- Avery, B., & Lu, H. (2020, September 30). Ban the Box: U.S. Cities, Counties, and States Adopt Fair Hiring Policies. <https://www.nelp.org/publication/ban-the-box-fair-chance-hiring-state-and-local-guide/>
- Blessett, B., & Pryor, M. (2013). "The Invisible Job Seeker: The Absence Of Ex-offenders In Discussions Of Diversity Management." *Public Administration Quarterly*, 37(3), 433-455. <http://www.jstor.org/stable/24372114>
- Couloute, Lucius, and Daniel Kopf. 2018. "Out of Prison & Out of Work: Unemployment among Formerly Incarcerated People." Prison Policy Initiative Report, <https://joinnia.com/out-of-work/>
- Delaney, R., Subramanian, R., & Patrick, F. (2016, July). "Making the Grade." Vera Institute of Justice, <https://www.vera.org/downloads/publications/making-the-grade-postsecondary-education-programs-in-prison.pdf>
- Jacobs, J. (2015). "Employment Discrimination Based on A Criminal Record." *The Eternal Criminal Record* (pp. 275-300). Harvard University Press.
<http://www.jstor.org/stable/j.ctt21pxkjv.21>

Kelly, L. (2010). "Re-entry Programs, From An Anti-unconventional Ex-Offender." *Dialectical Anthropology*, 34(4), 491-495. Retrieved October 22, 2020, from

<http://www.jstor.org/stable/29790971>

Kochhar, R. 2020, August 26. "Unemployment Rose Higher in Three Months of COVID-19 Than it Did in Two Years of the Great Recession." <https://www.pewresearch.org/fact-tank/2020/06/11/unemployment-rose-higher-in-three-months-of-covid-19-than-it-did-in-two-years-of-the-great-recession/>.

Lindsay, S. (2020). "Alleviating the Mark of a Criminal Record: Prison Programming and Post-Incarceration Employment." Muschert G., Budd K., Christian M., & Perrucci R. (Eds.), *Agenda For Social Justice 2020: Solutions For 2020* (pp. 115-124). Bristol University Press. <https://doi.org/10.2307/j.ctv14rmnsb.19>

NAACP. (2018, March 18). *Fair Chance Hiring Fact Sheet*. NAACP.

<https://www.naacp.org/fairchancehiring/>.

Pager, D. (2008). "Blacklisted: Hiring Discrimination in an Era of Mass Incarceration." In Anderson E. (Ed.), *Against the Wall: Poor, Young, Black, and Male* (pp. 71-86). University of Pennsylvania Press. <http://www.jstor.org/stable/j.ctt3fhmgx.8>

Pager, D. (2003). "The Mark of a Criminal Record." *American Journal of Sociology*, 108(5), 937-975. <https://doi.org/10.1086/374403>

- Paul-Emile, K. (2014). Beyond Title VII: Rethinking Race, Ex-offender Status, And Employment Discrimination In The Information Age. *Virginia Law Review*, 100(5), 893-952. <http://www.jstor.org/stable/24362712>
- “Ranking: Most Prisoners Per Capita By Country 2020.” (2020, June 16). Statista Research Department, <https://www.statista.com/statistics/262962/countries-with-the-most-prisoners-per-100-000-inhabitants/>
- Small, M., & Pager, D. (2020). “Sociological Perspectives on Racial Discrimination.” *The Journal of Economic Perspectives*, 34(2), 49-67. <https://doi.org/10.2307/26913184>
- Warner, C., Kaiser, J., & Houle, J. (2020). “Locked Out of the Labor Market? State-Level Hidden Sentences and the Labor Market Outcomes of Recently Incarcerated Young Adults.” *RSF: The Russell Sage Foundation Journal of the Social Sciences*, 6(1), 132-151. <https://doi.org/10.7758/rsf.2020.6.1.06>
- “Work Opportunity Tax Credit.” (n.d.). <https://www.dol.gov/agencies/eta/wotc->