



Interstate Commission
for Adult Offender Supervision
ICAOS Policies

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COMPLIANCE AUDIT POLICY 05-2009

I. Mission

To provide an independent, objective assurance that there is adherence to Commission rules, policies, and procedures.

II. Objectives

The objective of the ICAOS Compliance Audit Program is to provide independent assurance to the Commission that member states are managing the interstate transfer process efficiently, in compliance with ICAOS Rules and in a manner that is consistent with furthering the goals of the Compact.

III. Scope

The scope of the audit program is limited to Commission rules, policies, and procedures.

IV. Authority

Article III of the Compact Statute states in part, “administers enforcement and compliance with the provisions of the compact, its by-laws and as directed by the Interstate Commission and performs other duties as directed by Commission or set forth in the By-laws.”

Article V of the Compact statute states in part, “To enforce compliance with compact provisions, Interstate Commission rules, and by-laws, using all necessary and proper means, including but not limited to, the use of judicial process.”

Article IX Sec. (C) of the Compact Statute states, “The Interstate Commission, in the reasonable exercise of its’ discretion, shall enforce the provisions of this compact using any or all means set forth in Article XII, Section B, of this compact.”

V. Access

The Compliance Committee and designated national office staff, as appropriate, are granted authority for full, free, and unrestricted access to all compact records, files, and information systems. All employees of member states are required to cooperate with the staff of the national office in fulfilling their audit functions and duties.

VI. Confidentiality

Information provided to the national office or the Compliance Committee during the audit shall be

handled confidentially. The Executive Director shall ensure that internal staff is instructed in the handling and safeguarding of confidential information.

VII. Independence and Objectivity

The national office reports to the Executive Committee. The Executive Committee hires, evaluates, retains, and terminates the Executive Director.

The Executive Director shall have the freedom to discuss audit policies, audit findings and recommendations, audit follow-up, guidance issues, and other matters as necessary with the Executive Committee.

VIII. Responsibilities and Accountabilities

A. The Compliance Committee will conduct annual reviews of the audit program and recommend changes to the program, if needed.

B. The Compliance Committee will establish the audit standards and determine the annual audit schedule.

C. Before finalizing an audit report, the state that is the subject of the audit shall be given 30 calendar days to dispute and or respond in writing to any findings of noncompliance. The state's written response shall become part of the final report.

D. All final audit reports are provided to the Compliance Committee for review.

E. When a State or US Territory fails to achieve a compliance rate of 80% or better on established compliance standards, the Compliance Committee will require the State or US Territory to submit a corrective action plan for approval by the Executive Committee (see policy no. 03-2015 on corrective action plans).

F. Noncompliance issues discovered during the compliance audit will be addressed as outlined in the Commission policy titled, "Guidelines for Resolving Compliance Issues."

G. The national office will provide the Compliance Committee with a periodic report summarizing any developing trends in both compliance and noncompliance.

H. The national office will audit each member state or territory annually, unless directed otherwise by either the Compliance Committee or the Executive Committee.