

**REPORT OF THE**  
***Ad hoc* AUDIT COMMITTEE**  
**of the**  
**INTERSTATE COMMISSION FOR ADULT OFFENDER**  
**SUPERVISION**

**February, 2007**

## **Background**

At the 2005 Annual Business Meeting of the Interstate Commission for Adult Offender Supervision (ICAOS), Commissioner Warren Emmer, then Chairperson of the Compliance Committee, proposed developing a system to audit 20% of compacting states each year. Related to that initiative, the commission approved a motion to create an *ad hoc* Audit Committee, to develop an audit instrument. The *ad hoc* committee was chaired by Commissioner Dave Nelsen, ID, and included Colleen Fickel, DCA-PA, Gregg Smith, DCA-LA and Commissioner James McKenzie, NE.<sup>1</sup>

During the tenure of the committee, significant assistance was received from the Idaho Department of Corrections to construct a series of Quality Self Assessment (QSA) instruments focusing on interstate compact operations.<sup>2</sup> The committee members modified and refined sections of the QSA, but a complete QSA accounting for all aspects of compact operations from both a sending and a receiving state's perspective was not formally adopted by the *ad hoc* Audit Committee.

In May, 2006, Chairperson Emmer asked William Rankin, Commissioner-WI, to "field test" the draft QSA instruments in the Arkansas Compact Office. Rankin agreed to test the instrument and also agreed to test other versions and approaches, including adapting the American Correctional Association (ACA) Standards related to interstate compact.

## **Arkansas Field Test**

In preparation for the field test, Rankin contacted Arkansas DCA Linda Strong to determine what information is available and to request background material about the compact operations in AR. Rankin received and reviewed written policies and procedures, Compact Office organization chart and position descriptions for compact office staff. From numbered lists of cases transferring into and out of AR during 2005, Rankin randomly selected 12 cases transferred into AR, 12 cases transferred out of AR and 10 cases (5 into and 5 out of AR) rejected during 2005. The list of selected cases was sent to AR with a request that case files be made available in the compact office for Rankin's review.

Rankin interviewed staff and reviewed electronic and field case files in Little Rock on May 17-18, 2005. Some requested field files were not delivered to the compact office in time for the review. In those cases, review was confined to information contained in AR's compact information system. (It should be noted that AR has a well-developed information management system, including interstate compact information. The case

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<sup>1</sup> Subsequently, Commissioner's Nelsen and McKenzie left the committee. In June, 2006, Commissioner Emmer named Commissioner William Rankin, WI, to chair the committee.

<sup>2</sup> Special recognition is extended to Michaela Reitcheck, Senior Management Analyst, ID DOC, for invaluable assistance in understanding and developing QSA.

information provided through that system would not likely be available in many states.) In total, 27 individual cases were reviewed. Field case files were available for 15.

The assessment results were compiled and sent to Commissioner David Guntharp on June 1, 2006. (Exhibit 5) Rankin also presented the findings to the ICAOS Compliance Committee on June 28, 2006.

The completed assessment instruments tested in Arkansas included:

- Interstate Compact Audit forms (adapted from QSA Formats) - Exhibit 1
- Single Case File Audit, Summary form - Exhibit 2
- Comparison of ICAOS Rules and Corresponding AR DOCC Manual Sections - Exhibit 3
- Critical Standards Model, adapted from ACA Standards - Exhibit 4

## Observations

After completing the four distinct assessment instruments, the following observations are possible:

### Interstate Compact Audit form

The QSA instrument offered some definite benefits, but needs further development. It is clearly a better tool for assessing policy than for auditing compliance with ICAOS rules. The primary drawback is the general YES/NO format of the item responses. This format doesn't permit measurement of degrees of compliance. It seems to work best as a tool to identify whether a practice is *expected* rather than as a yardstick of the extent that an expected practice *occurs*. It is a *qualitative* assessment, more than a quantitative one.

### Single Case File Audit form

This format is appropriate for collecting *quantifiable* information about compliance with ICAOS rules. Combining results of a sample of Single Case File Audits provides an estimate of the overall extent a state's cases comply with the rules. Reviewing a file and completing this form typically took about 20 minutes. Complex cases took as much as 40 minutes to review.

Specific forms were developed for use when AR was the Sending State and when AR was the Receiving State. The forms also noted whether the other state had complied with a particular ICAOS rule. This was an attempt to assess AR's rate of compliance, relative to the states AR dealt with.

A Summary Report of single case file audits can provide significant information about a state's overall compliance, but this approach and this format have their own drawbacks:

- Certain items had high rates of "Unknown" responses because the answers simply weren't recorded in the files. Electronic files often noted an action, but lacked the actual ICAOS form which was needed to accurately answer an item.

It would be necessary to interview field staff to obtain answers to some items. Even then, some responses may not be objectively verifiable.

- Certain items had high rates of “Not Applicable” responses because the issues were relatively rare events among the sampled cases. This is partly attributable to the selection criteria. Sampling based on a wider range of targeted criteria would reduce this problem.
- This is a labor-intensive approach, requiring on-site review of case material. Consequently, it could involve significant expenditures to audit a sample of cases sufficient to estimate a state’s true rate of compliance with the whole spectrum of rules.

Notwithstanding the obstacles to this approach, even the small sample of cases reviewed during the field test suggested several areas where AR (or the other states) appeared to be complying with ICAOS rules at a very high rate and others where compliance could be improved.

#### Comparison of ICAOS Rules and Corresponding AR DOCC Manual Sections

This assessment highlights areas where ICAOS rules are or are not addressed in a state’s written policies and procedures manual. This turned out to be a difficult process due to differences in organization and language. The ICAOS Rules are complex and a state’s written policy may address a part of a rule and be silent on other parts.

#### Critical Standards Model, adapted from ACA Standards

This assessment has a narrower focus than the previous model. The intent is to identify “critical standards” and then document the presence or absence of written policies and procedures directing compliance with those standards. This tool was adapted from the ACA Standards, primarily to demonstrate its utility as an audit instrument. An “official” instrument may identify other “critical” standards for audit. As used here, the tool is useful for assessing a state’s administrative efforts to assure compliance through written directives. It is not a useful tool to measure a state’s actual practice. However, it could be the basis for developing a quantitative audit tool.

## **Discussion**

The selection of an appropriate audit tool or procedure should be determined by the goal to be accomplished. The Compliance Committee’s goal to promote compliance by the states may incorporate “audit” practices on several levels. It seems clear that different approaches could be used to:

- assist states to review their practices to identify strengths or weaknesses;
- document states’ administrative efforts to direct compliance with ICAOS rules within their jurisdictions;
- survey a sample of cases to identify potential problems of compliance with “critical” standards; or
- examine a sample of cases selected to estimate the extent of a particular compliance problem.

These process levels could be arrayed along an “audit continuum” as:

- Self-assessment (QSA).
- Certification Audit
- Accreditation or Compliance Audit
- Corrective Action or Verification Audit

Each successive level would increase the amount of direct involvement required from an external reviewer and carries additional related costs.

This continuum (without the labels) was discussed by the Compliance Committee in June, 2006. At that meeting, the committee asked for continued refinement of a model QSA format. Colleen Fickle and Rankin exchanged several versions before agreeing on a proposed QSA. A sample, completed for Wisconsin, is attached. (Exhibit 6) The QSA does not require an external, on-site reviewer. It is a relatively simple format to complete and could be modified to suit a state’s unique structure.

The “Critical Standards” Certification Audit is also a relatively simple instrument. It does not require an on-site reviewer. The audited state could identify the relevant policies and procedures, then forward the appropriate documentation to the reviewer(s) for verification. This certification could be valuable for a state faced with default or liability for actions of staff within its jurisdiction. Certification by the commission would provide a degree of protection by demonstrating the state’s good faith effort to adhere to accepted standards.

Accreditation or Compliance Audit would require on-site review of file material by an external reviewer. The Single Case File Audit forms would be appropriate for a general survey of selected cases to identify areas where a state or jurisdiction may need improvement. A different version than the one presented here, if based on the Critical Standards, could be used to advance the commission’s “stamp of approval” to another level (“accreditation” being a higher endorsement than “certification”).

The Corrective Action or Verification Audit also requires on-site review of file material by an external reviewer. It is more narrowly focused than a broad Certification Audit. Since this audit is completed in response to an identified compliance problem, participation may not be completely voluntary on the part of the audited jurisdiction. Since it will require on-site review of a case sample large enough to permit an estimate of the extent of compliance it is likely to be the most costly option. Specifics of the audit should be developed in negotiations between the reviewer(s) and the audited jurisdiction. This should include a specification of how expenses will be allocated. A written audit plan should be approved and signed by the reviewing authority and the audited state’s representatives. A sample format for a plan is attached. (Exhibit 7)


## **Recommendations**

- The Compliance Committee should continue develop an “audit continuum” to assist, encourage and verify compliance with ICAOS Rules. The continuum

should encompass a range of internal/external review, voluntary v. compulsory, long-distance v. on-site review, and policy v. practice assessments.

- The Quality Self Assessment instrument proposed by Fickle and Rankin should be adopted and circulated to states for internal use. Use or modification of the instrument should be left to the discretion of member states.
- The Compliance Committee should adopt a set of “critical” standards which states are encouraged to incorporate into written directives. The commission should adopt a process for certifying that a state’s written policies and procedures are consistent with the standards. The American Correctional Association provides a model worth emulating. A joint effort with ACA or the American Probation and Parole Association could provide external validation of any ICAOS certification program.
- The Compliance Committee should adopt the Single Case File Audit format for general surveys of compliance issues. A state may choose to regularly audit a sample of case to identify potential compliance issues. The format could also be used in a Compliance or Accreditation audit, should the Compliance Committee wish to pursue that system.
- Corrective Action or Verification Audits must be developed with regard to the unique characteristics of each situation. The *ad hoc* Audit Committee does not recommend adoption of a standard instrument. Rather, these audit strategies and tools should be narrowly focused to address the specific compliance issue requiring action.
- The *ad hoc* Audit Committee is a good vehicle to continue development of a model procedure. However, as an *ad hoc* committee, its scope must be limited and clearly defined. Recently, the *ad hoc* committee has lacked a clear direction. If the Compliance Committee agrees with the recommendations contained in this report, this may provide a guide for future committee activity. However, the committee should be reconstituted, with a new chairperson. If the Compliance Committee wishes to pursue a systematic audit function, it should consider creating a permanent Audit sub-committee attached to the Compliance Committee.

Respectfully Submitted,

 Date: 2/15/2007  
William Rankin, Chair  
Ad hoc Audit Committee

# INTERSTATE COMPACT AUDIT ARKANSAS as Receiving State

	<b>Initials</b>
<b>QSA Manager</b>	
<b>QSA Reviewer/s</b>	Rankin

**PROGRAM**

**TRANSFER OF SUPERVISION TO A RECEIVING STATE FROM A SENDING STATE**  
(Arkansas is Receiving State)

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>Comment</b>
Does the (receiving) state have written procedures documenting how transfer of supervision requests from another state will be processed?	<b>X</b>		Reviewed Compact office procedures, Section 5 of DCC manual. Updates still in progress.
Is the receipt of the transfer request from a sending state documented by the receiving state?	<b>X</b>		Date of receipt is entered in eomis database.
Is the sending state notified by the receiving state when transfer request is received?	<b>X</b>		This is AR IC practice, but is not required by ICAOS rule.
Are transfer requests from sending states reviewed for completeness by the receiving state?	<b>X</b>		Management Project Analyst
If transfer requests are deemed incomplete (by the receiving state), is the sending state notified within five business days of receipt?	<b>X</b>		Usual practice is to call the sending state or return the incomplete packet.
Is an explanation of the nature of incompleteness included?	<b>X</b>		AR IC uses a standard form letter for this purpose.
If the offender does not meet eligibility requirements as defined by the Interstate Compact rules adopted Aug 1, 2004 and a receiving state consents to accepting the offender, is the "good cause" documented and approved?		<b>X</b>	There is no specific policy requirement that "good cause" acceptances be justified and approved. (ICAOS rules don't require special documentation.) If agent accepts case, approval is presumed. Deputy CA only reviews rejected cases.
Is an investigation initiated by the receiving state upon receipt of a transfer request, ?	<b>X</b>		Sec 5-09
Is the investigation completed by the receiving state within 45 days from date of receipt of the request?	<b>X</b>		AR IC policy allows 30 days for field investigation. (Sec 5-09) This practice allows time for IC office action.

## INTERSTATE COMPACT AUDIT ARKANSAS as Receiving State

Is the offender reviewed and categorized based upon receiving state's supervision requirements?	<b>X</b>		Offender goes through AR standard intake and assessment.
Is the proposed time of supervision by the sending state considered in the decision to accept the offender for supervision by the receiving state?	<b>X</b>		Sec 5-17 (j)
Are special conditions of supervision considered based upon sentencing guidelines within the receiving state?	<b>X</b>		Sec 5-17 (j)
Are special conditions of the sending state evaluated for compatibility with those imposed upon current offenders in the receiving state?	<b>X</b>		Sec 5-17 (j)
Is inquiry made of the <b>sending</b> state, regarding special conditions of supervision?		<b>X</b>	Not routinely. (Not a requirement. Unsure why this item is included.)
If the receiving state can not implement special conditions of supervision, is the sending state notified?	<b>X</b>		Sec 5-17 (j)
Upon accepting transfer of supervision from another state, is the offender notified of the receiving state's offender registration and DNA testing requirements?	<b>X</b>		Sec 5-17 (j)
Is the receiving state's notification of registration and DNA requirements documented by the receiving state?	<b>X</b>		In eomis.
Is receipt the departure notification/information from the sending state documented by the receiving state?	<b>X</b>		In eomis.
Upon arrival of the offender in the receiving state, is the sending state notified by the receiving state?	<b>X</b>		Sec 5-17 (h)
If an offender does not report as instructed, are the following steps performed by the receiving state: <del>instructions withdrawn by the receiving state?</del>			
Immediate withdrawal of travel instructions issued by the receiving state.		<b>X</b>	Immediate withdrawal of RI is permitted, but not required, by rule. Not current AR IC practice.
Immediate notification of the <b>sending</b> state of failure of the offender to report as instructed?	<b>X(?)</b>		Assumed. Should be added to written policy.
Are offender progress reports sent to the sending state annually? SEE THE ANNUAL PROGRESS REPORT FOR ADDITIONAL TESTING PROCEDURES	<b>X</b>		Sec 5-10. Recorded in eomis.



	Name	Initials
	INTERSTATE COMPACT AUDIT	
QSA Manager		
QSA Reviewer/s	Rankin	

PROGRAM

RETAKEING OF THE OFFENDER BY ICAOS MEMBER STATE

QSA STEP	YES	NO	Comment
Does the Interstate Compact Office have written procedures regarding the re-taking of an offender whose supervision has been transferred to a receiving state?	X		Sec 5-15 (a) describes what to do when AR is the receiving state, i.e., probable cause hearing, detainer warrant. Sec 5-15 (b) describes when a state is required to retake an offender.
Do retaking procedures require the sending state to ensure the offender has not been charged with a subsequent criminal offense in the receiving state?		X	Not in written policy.
If the receiving state has charged the offender with a subsequent criminal offense, retaking procedures are initiated after the following:			
The consent of the receiving state has been received?	X		Upon disposal of charges in receiving state.
Criminal charges by the receiving state have been dismissed?	X		As above.
The offender has been released from supervision incarceration for the subsequent offense?	X		Warrant is filed; enforced when offender is available.
Are retaking procedures initiated at the request of a receiving state for the return of an offender that has been convicted of a new felony offense?	X		Sec 5-15 (b)
Are re-taking procedures initiated for offenders that have committed three or more separate significant violations of supervision and the receiving state has requested a return?	X		Sec 5-15 (b)

<p>Upon initiating the retaking procedures, is the authority of the officer and the identity of the offender documented?</p>			<p>Responsibility of the holding facility. These partners should be educated about IC requirements.</p>
<p>Prior to re-taking of an offender from a local, state or federal facility is the following confirmed:</p>			
<p>No detainer has been placed against the offender by the state in which the correctional facility lies?</p>		<p><b>X</b></p>	
<p>No extradition proceedings have been initiated against the offender by a third party state?</p>		<p><b>X</b></p>	
<p>Is bail denied to any offender against whom a sending state has initiated re-taking procedures?</p>			<p>Responsibility of the court. Deputy CA not aware of it ever being an issue. Are the courts trained in IC rules re bail, retaking vs. extradition?</p>

# INTERSTATE COMPACT AUDIT ARKANSAS

	Initials
Name	
QSA Manager	
QSA Reviewer/s	

## PROGRAM

### COST OF SUPERVISION, VIOLATIONS IN ARKANSAS as RECEIVING STATE

QSA STEP	YES	NO	Comment
Are Cost Of Supervision (COS) fees imposed on offenders from sending states?	<b>X</b>		Sec 5-17 (a). \$25/mo, unless waived for cause.
Are the COS fees of offenders in the sending state considered to ensure the amount charged to offenders does not exceed current fees or the amount paid in the sending state?		<b>X</b>	Not a requirement. Unsure why this item is here. ICAOS rules only require that the fee be reasonable and not greater than receiving state's offenders.
If sending states notify the receiving state of non-payment by offender of financial obligations imposed by the Sending state, are the offenders notified of:			Sec 5-17 (b) only says "receiving state agrees to use its best endeavors" to see that \$\$ is paid.
Violation of conditions of supervision?	<b>X</b>		Per Deputy CA
The address to which payments are to be sent?	<b>X</b>		Per Deputy CA
Upon significant violation of conditions of supervision is the sending state notified within 30 days?	<b>X</b>		Sec 5-15 (b)
Does the violation report contain the following:			Sec 8 describes violation reports. Use of ICAOS forms (Sec 5-14) assures content described below will be present.
Offender's name and location?	<b>X</b>		ICAOS Violation Report
Offender's state-issued identifying numbers (the sending state and receiving state's #)	<b>X</b>		ICAOS Violation Report
Date of the offense or infraction that forms the basis of the violation?	<b>X</b>		ICAOS Violation Report

# INTERSTATE COMPACT AUDIT ARKANSAS

Description of the offense or infraction?	<b>X</b>	ICAOS Violation Report
Status and disposition, if any, of the offense or infraction?	<b>X</b>	ICAOS Violation Report
Dates and descriptions of any previous violations?	<b>X</b>	ICAOS Violation Report
The receiving state's recommendations of action the sending take may take?	<b>X</b>	ICAOS Violation Report
The name and title of the officer making the report?	<b>X</b>	ICAOS Violation Report
If the offender has absconded, the offenders last known: Address ?	<b>X</b>	ICAOS Violation Report, Case Closure Notice
Telephone Number?	<b>X</b>	ICAOS Case Closure Notice
Name and address of employer?	<b>X</b>	ICAOS Case Closure Notice
Date of the offender's last personal contact with the supervising officer?	<b>X</b>	ICAOS Violation Report

# INTERSTATE COMPACT AUDIT ARKANSAS

	Name		Initials
	QSA Manager		
	QSA Reviewer/s		
	Rankin		

## PROGRAM TRANSFER OF SUPERVISION – EXCEPTION; VICTIM NOTIFICATION

QSA STEP	YES	NO	Comment
Does the State train Probation and Parole regarding exception to rules of the Interstate Compact for Adult Supervision?	X		Included in ICAOS PowerPoint training.
Has the State adopted written procedures for documentation of exception transfer of supervision process?		X	
Are the Known Victims within the state notified of the Transfer Request?		X	Not required by AR victim statutes, so not required by ICAOS rule. Not a current practice. Sec 5-18 (k) is a disclaimer.
Are victims notified that they have the right to be heard regarding their concerns related to the transfer request?		X	See above.
Are victims notified that they have the right to contact the interstate compact office of the Receiving state any time by telephone, telefax or conventional or electronic e-mail?		X	See above.
Is the contact information for the sending and the Receiving State's interstate compact offices provided to the known victims by IDOC?		X	See above.
Are victim responses, comments and concerns compiled and forwarded to the Receiving State's interstate Compact Office?		X	See above.
Are Comments from Victims in the Receiving State Considered by IDOC?		X	See above.
Is the consideration of victims comments documented by the receiving state as support for the decision to continue the transfer of supervision to a receiving state?		X	See above.

**INTERSTATE COMPACT AUDIT  
ARKANSAS**

Upon notification that a receiving state will accept transfer of an offender, is the acceptance of supervision by the Receiving state documented?	<b>X</b>		Logged in eomis.
Is a copy of Reporting Instructions issued to the offender placed in the offender file?	<b>X</b>		Electronic and/or paper file.
Are known victims of the offender within the receiving state notified of the Transfer of Supervision within one business day of the issuance of reporting instructions?		<b>X</b>	Not required by AR victim statutes, so not required by ICAOS rule. Not a current practice. Sec 5-18 (k) is a disclaimer.

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Receiving State**  
**May 17-18, 2006**

<b>Audited State:</b> ARKANSAS (as Receiving State)	
<b>QSA Reviewer/s:</b> William Rankin, Commissioner WI Dept of Corrections	<b>Date of Review:</b> May 17-18, 2006

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
<b>Transfer Request/Investigation</b>					
Is the receipt of the transfer request from a sending state documented by the receiving state?	14				
Is the sending state notified by the receiving state when transfer request is received?	10	4			Good practice. Not required by ICAOS rule.
Was transfer request reviewed for completeness by the receiving state?				14	Who/When? Routine part of MPA duties, but not documented.
If transfer request deemed incomplete (by the receiving state), was the sending state notified within five business days of receipt?			7	7	If I saw a Reply, without a request for information, I assume N/A. If I didn't see a Reply, I coded UNK
Is an explanation of the nature of incompleteness included?			7	7	Missing: None observed in sample cases.
If a parolee, was request submitted within 120 days of scheduled release?	4	1	5	4	Sending State's Responsibility
If offender was in state prior to investigation, were reporting instructions requested?	4	1	5	4	Sending State's Responsibility
If YES, were reporting instructions provided: <ul style="list-style-type: none"> <li>• Consistent with rule 3.103 or 3.106?</li> <li>• Within 2 work days (3.103)?</li> </ul>	4 4		7 7	3 3	
If YES, did supervision begin when offender reported as directed?	3	1	7	3	
If YES, was transfer request received within (circle appropriate): <ul style="list-style-type: none"> <li>• 15 calendar days, for offender living in state?</li> <li>• 7 calendar days, for expedited transfer?</li> </ul>	1	4	7	2	Sending State's Responsibility. Not always clear which rule applies.

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Receiving State**  
**May 17-18, 2006**

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
Does the Transfer Request describe how the offender meets eligibility requirements as defined by the Interstate Compact rules adopted Aug 1, 2004 or why the case should be accepted "with consent"?	11			3	If file not available, used eomis field. Assumed it reflects the Transfer Request.
Is an investigation initiated by the receiving state upon receipt of a transfer request?	14				Not a very useful item.
Is the investigation completed by the receiving state within 45 days from date of receipt of the request?	9	5			Useful item. Important compliance issue.
Does the decision have the concurrence of the compact administrator or designated deputy?		10		2	Assumed NO for all 10 acceptances. Couldn't tell for 2 rejected cases. Not documented.
If Rejected, is decision consistent with 3.101/3.101-1?	1	1*	12		*Failed to report to agent. No info in rejection about proposed plan, IC criteria.
If rejected, Sending State ordered offender to return or issued warrant (for offender already in Receiving State)			12	2	
If rejected, did Receiving State continue supervision until offender departed?			12	2	
If accepted, are specific reporting instructions provided? (offender remaining in Sending State)	6		8		
<b>Supervision</b>					
Did the Sending State send a Notice of Departure?	1	12	1		Sending State's Responsibility. Important compliance issue.
Did the Receiving State send a Notice of Arrival?	7	5	2		Important compliance issue.
If the offender did not report as instructed, were the following steps performed by the receiving state: Immediate withdrawal of travel instructions issued by the receiving state.					Not observed in any sample cases.
Immediate notification of the sending state of failure of the offender to report as instructed?			11	3	
If parolee, withdrawal of acceptance by receiving state?			11	3	
Are special conditions of supervision considered based upon sentencing guidelines standards within the receiving state?	6		2	6	Not sure how useful or valid this item is. It should be an automatic YES for accepted cases.



**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Receiving State**  
**May 17-18, 2006**

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
Is Sending State notified of Receiving State's Special Conditions?	2	1	3	8	Should be included in Reply to Transfer Request. NA means none were identified.
Are special conditions of the sending state evaluated for compatibility with those imposed upon current offenders in the receiving state?	3		2	9	Hard to determine without file and agent.
Is inquiry made of the sending state, regarding special conditions of supervision?		5	2	7	Not sure why this item is here. No reason to expect an inquiry.
If the receiving state cannot implement special conditions of supervision, is the sending state notified?			7	7	No cases observed where record indicated AR unable to implement a condition.
Upon accepting transfer of supervision from another state, is the offender notified of the receiving state's offender registration and DNA testing requirements?	7		2	5	
Is the receiving state's notification of registration and DNA requirements documented by the receiving state?	7		2	5	
Are offender progress reports sent to the sending state annually?	6	1	6	1	
Are Progress Reports complete?	5	1	6	2	
Are there any significant violations? (Code N/A if None.)	3		9	2	
• Violation Report sent within 30 days?	1	2	9	2	
• Sending State response received within 10 days?			11	3	
• Retaking requested or required?	1		11	2	
Is this a "Victim Sensitive" case?			10	4	
If YES, was Sending State notified if offender did any of the following:			10	4	
• Committed a Significant violation	_____	_____		_____	
• Changed address	_____	_____		_____	
• Returned to sending state where victim resides	_____	_____		_____	
• Departed to subsequent receiving state	_____	_____		_____	
• Was issued a temporary travel permit for more than 24 hours but no more than 31 days	_____	_____		_____	
Did receiving state impose a supervision fee?	9	2	2	1	"Waived fees" coded NO.

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Receiving State**  
**May 17-18, 2006**

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
If YES, is fee same as charged to state's offenders?	9		4	1	
<b>Case Closing/Retaking</b>					
If offender returned to Sending State, were reporting instructions requested prior to departure?	1	1	11	2	Return without permission of AR agent is coded N/A.
Was Departure Notice sent?	1	1	11	2	
<p>If offender transferred to third state, were the following procedures followed:</p> <ul style="list-style-type: none"> <li>• Receiving state assisted with forms, signatures, etc.</li> <li>• Receiving state sent summary of progress to Sending State</li> <li>• Offender remained in receiving state until receipt of reporting instructions</li> <li>• Receiving state sent Departure Notice to Sending State and Subsequent Receiving State</li> </ul>					
			14		No transfers to third state observed in sample cases.
<p>If Receiving State closed supervision:</p> <ul style="list-style-type: none"> <li>• Valid reason, per 4.112?</li> <li>• Sending State was <u>not</u> in process of retaking*</li> <li>• Case Closure Notice sent, including last known address and employer</li> </ul>					
	3	1	9	1	Invalid reason was "committed new offense". *If case was closed due to violation, without sending state's awareness, code N/A.
	2		11	1	
	4		9	1	
<p>Was Retaking initiated,</p> <ul style="list-style-type: none"> <li>• With consent of Receiving State, if new charges not disposed of?</li> <li>• Upon request, after conviction for a felony?</li> <li>• Upon request, after 3 significant violations?</li> </ul>					
	1*		11	2	*Warrant issued by sending state after AR sent Case Closure Notice advising of new charges.
			12	2	
			12	2	
Was a Probable Cause hearing held or waived?	1	1	11	2	
Was offender denied bail in the Receiving State once retaking procedures were initiated?			12	2	
Did the Sending State retake the offender within 30 days of decision to retake or upon release from incarceration?	1		11	2	

SUMMARY OF SINGLE CASE FILE AUDITS  
AR-Receiving State  
May 17-18, 2006

ADDITIONAL COMMENTS:

AR 165051 Offender returned to LA at end of school year. AR closed without obtaining reporting instructions or sending Notice of Departure

AR 1122170 Investigation completed within 45 days, but acceptance not sent to sending state until 70 days. Arrival report sent 01/06, but e-notes indicate offender was in AR, on EMP, from 10/4/05-11/3/05.

AR 167675 Agent's notes say Viol Report sent 4/07/06. Resubmitted 5/12/06, with Case Closure Notice.

AR 160990 No file. Reporting instructions given, case accepted. Arrival notice. No further supervision history. (WI case, last name: ██████████)

AR 160108 New arrest not reported to sending state, because "\_\_\_ probably wouldn't do anything."

AR 065880 No file. No record of Reply to Transfer Request, but status notation on Reporting Instructions says "Accepted". EOMIS screen says "Action Taken".

AR 158254 No file. Case closed 12/20/05: "new charges." Violation Report sent 1/13/06 after request from sending state.

AR 156271 Reply to Transfer Request, Reporting Instructions not part of file. E-documents not found in eomis.

Reviewed 14 cases:

6 accepted T-IN cases	case file and e-file
6 accepted T-IN cases	e-file only
2 rejected T-IN cases	case file and e-file

Reviewer's signature \_\_\_\_\_

\_\_\_\_\_ Date

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Sending State**  
**May 17-18, 2006**

<b>Audited State:</b>	<b>ARKANSAS (as Sending State)</b>
<b>QSA Reviewer/s:</b> William Rankin, Commissioner WI Dept of Corrections	<b>Date of Review:</b> May 17-18, 2006

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
<i>Transfer Request/Investigation</i>					
Is the date the transfer request was sent recorded by the receiving state?	13				Date Sent:
Was transfer request reviewed for completeness prior to sending?				13	Who/When? Management Project Analyst. Not documented.
Does the Transfer Request describe how the offender meets eligibility requirements as defined by the Interstate Compact rules or why the case should be accepted "with consent"?	6	2		5	
If transfer request deemed incomplete (by the receiving state), was the sending state notified within five business days of receipt?	1	2	7	3	Receiving State's Responsibility
Is an explanation of the nature of incompleteness included?	1		8	4	Missing: Receiving State's Responsibility
If a parolee, was request submitted within 120 days of scheduled release?	3		8	2	
If offender was in Receiving state prior to investigation, were reporting instructions requested?	2	5	5	1	Important compliance issue.
If YES, were reporting instructions provided:					
• Consistent with rule 3.103 or 3.106?	2		9	2	Receiving State's Responsibility. Not always clear which rule applies.
• Within 2 work days (3.103)?	2		9	2	
If YES, was transfer request sent within (circle appropriate):	2				
• 15 calendar days, for offender living in state?			9	2	
• 7 calendar days, for expedited transfer?					Important compliance issue.
• If not sent within specified time, offender was directed to return by specified date	1		11	1	

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Sending State**  
**May 17-18, 2006**

	YES	NO	12	1	Comment
<ul style="list-style-type: none"> <li>Warrant issued, if offender did not return</li> </ul>			12	1	
<b>QSA STEP</b>			N/A	UNK	
Is the investigation completed by the receiving state within 45 days from date of receipt of the request?	5	8			Receiving state's responsibility. Important compliance issue.
Does the decision have the concurrence of the compact administrator or designated deputy?				13	
If Rejected, is decision consistent with 3.101/3.101-1?		2*	11		*Incomplete packets
If rejected, offender was ordered to return or warrant issued (for offender already in Receiving State)			12	1	Important compliance issue.
Offender returned or warrant issued			12	1	
If accepted, are specific reporting instructions provided? (offender remaining in Sending State)	6		7		Receiving state's responsibility. Important compliance issue.
<b>Supervision</b>					
Receiving State notified Sending State that it cannot implement special conditions of supervision			13		No notices observed.
Did the Sending State send a Notice of Departure?	6	5	2		Important compliance issue.
Did the Receiving State send a Notice of Arrival?	8	3	2		Receiving State's Responsibility Important compliance issue.
If the offender did not report as instructed, the Sending State was immediately notified			10	3	Receiving State's Responsibility.
<ul style="list-style-type: none"> <li>Sending State took corrective action</li> </ul>			13		No notices observed. Important compliance issue.
Are offender progress reports sent to the sending state annually?	7	1	5		Receiving state's responsibility. Important compliance issue.
Are Progress Reports complete?	7	1	5		
Are there any significant violations? (Choose N/A, if None.)	2		11		Receiving state's responsibility. Important compliance issue.
<ul style="list-style-type: none"> <li>Violation Report sent within 30 days?</li> </ul>	2		11		
<ul style="list-style-type: none"> <li>Retaking requested or required?</li> </ul>	1	1	11		

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Sending State**  
**May 17-18, 2006**

<b>QSA STEP</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
<ul style="list-style-type: none"> <li>Sending State response sent within 10 days of receipt of Violation Report?</li> </ul>	1	1	11		Important compliance issue.
If a "Victim Sensitive" case", appropriately identified?			13		AR statutes do not require notification to victims when offenders request or transfer under interstate compact.
If YES, Sending State notify victim if offender did any of the following: <ul style="list-style-type: none"> <li>Committed a Significant violation</li> <li>Changed address</li> <li>Returned to sending state where victim resides</li> <li>Departed to subsequent receiving state</li> <li>Was issued a temporary travel permit for more than 24 hours but no more than 31 days</li> </ul>			13		No "Victim Sensitive" cases.
Sending State did not charge a supervision fee after the offender had transferred? (Accepted and arrived in RS)	11		2		Fees waived upon acceptance and arrival.
<b>Case Closing/Retaking</b>					
If offender returned to Sending State, were reporting instructions requested prior to departure?			13		Receiving State's Responsibility. Important compliance issue.
Was Departure Notice sent?			13		Receiving State's Responsibility. Important compliance issue.
If offender transferred to third state, the Sending State submitted the transfer request to the third state, in the same manner as the initial request.			13		No third state transfers in sample.
If Receiving State closed supervision: <ul style="list-style-type: none"> <li>Valid reason, per 4.112?</li> <li>Sending State was not in process of retaking</li> <li>Case Closure Notice sent, including last known address and employer</li> </ul>	1*		12		*Retaken. No Case Closure Notice.
	1		12		
	-		12	1	
Was Retaking initiated, <ul style="list-style-type: none"> <li>With consent of Receiving State, if new charges not disposed of?</li> <li>Upon request, after conviction for a felony?</li> </ul>	1*		12 13 13		*Retaken upon request. Decision of AR. Not mandatory under ICAOS rules.

**SUMMARY OF SINGLE CASE FILE AUDITS**  
**AR-Sending State**  
**May 17-18, 2006**

Upon request, after 3 significant violations?				13	
<b>QSA STEP</b>					
Was a Probable Cause hearing held or waived?	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>UNK</b>	<b>Comment</b>
Did the Sending State retake the offender within 30 days of decision to retake or upon release of offender from incarceration?			12	1	Receiving State's Responsibility. Important compliance issue.
		1		12	Important compliance issue.

**ADDITIONAL COMMENTS:**

- AR 110906 Offender is in KY, but "Client Synopsis" screen says TN. Appears that offender was in receiving state prior to investigation, without reporting instructions.
- AR 132588 Departure Notice present in file; not noted in eomis. Arrival Notice noted in eomis; not present in file.
- AR 1122728 Parolee was allowed to relocate to MD, approximately 09/2003. Transfer requested 10/2004, when case assigned to new agent.
- AR 12318 Offender was in receiving state without reporting instructions. TX PO told offender to continue reporting to AR until accepted. No Acceptance recorded in eomis. (File not available.)
- AR 149517 Offender was in receiving state without reporting instructions. No Acceptance noted in eomis, but fees waived 06/01/2005.
- AR 150398 Offender was in receiving state without reporting instructions. Ordered to leave receiving state, but was given TP to live in third state pending transfer investigation in receiving state.
- AR 164149 At time of Transfer Request, probation violation trial pending. (Offender in "substantial compliance"?)

**Reviewed 13 cases:**

- 5 accepted T-OUT cases case file and e-file
- 2 accepted T-OUT cases blue file and e-file only
- 4 accepted T-OUT cases e-file only
- 2 rejected T-OUT cases case file and e-file

Signature of reviewer \_\_\_\_\_

Date \_\_\_\_\_

ICAOs RULES AND CORRESPONDING ARKANSAS DOCC POLICY AND PROCEDURES MANUAL SECTIONS

ICAOs Rule	Title	AR IC Manual Section	Comment
<b>Chapter 1</b>	<b>Definitions</b>		Embedded in relevant manual sections: Resident, Resident Family
<b>Chapter 2</b>	<b>General Provisions</b>		
2.101	Involvement of interstate compact offices	5-03	
2.102	Data collection and reporting	5-17(c),(e)	
2.103	Dues formula		
2.104	Forms	5-14	
2.105	Misdemeanants	5-05	Incomplete (missing: "at least one year of supervision"); Incorrect ( <u>sex offense</u> requires offender to register in sending state, not an <u>offender</u> who is required to register...)
2.106	Offenders subject to deferred sentences		
2.107	Offenders on furlough work release		
2.108	Offenders with disabilities		
2.109	Adoption of rules; amendment		
2.110	Transfer of offenders under this compact	5-03(a)	
<b>Chapter 3</b>	<b>Transfer of Supervision</b>		
3.101	Mandatory transfer of supervision	5-03(a)	
3.101-1	Mandatory transfers of military, families of military and family members employed	5-03(b)	Clarify Part 2, "military member" must be a "family member who is deployed".
3.101-2	Discretionary transfers of supervision		
3.102	Submission of transfer request to receiving state	5-03(b)	



ICAOs RULES AND CORRESPONDING ARKANSAS DOCC POLICY AND PROCEDURES MANUAL SECTIONS

3.103	Acceptance of the offender by receiving state; exception	5-03(b) 5-06 5-11	Incomplete. (Missing: Required signature forms.)
3.104	Time allowed for investigation by receiving state	5-03(a) 5-06	
3.104-1	Acceptance of offender; issuance of reporting instructions	5-04	120 day expiration of acceptance only applies to probation cases.
3.105	Request for transfer of paroling offender	5-06	Numbering error. 120 day expiration is incorrect.
3.106	Request for expedited transfer	5-08	
3.107	Application for transfer of supervision	5-04	
3.108	Victim notification	5-18(k)	Numbering error
3.108-1	Victims' right to be heard and comment	5-18(k)	Numbering error
3.109	Waiver of extradition		
<b>Chapter 4</b>	<b>Supervision in Receiving State</b>		
4.101	Manner and degree of supervision in receiving state	5-09 5-17(f)	
4.102	Duration of supervision in receiving state	5-17(j)	
4.103	Special conditions	5-09 5-17(j)	
4.104	Offender registration in receiving state	5-09	
4.105	Arrival and departure notifications; withdrawal of reporting instructions	5-17(h),(i)	
4.106	Progress reports	5-10	
4.107	Fees	5-17(a)	
4.108	Collection of fines and other costs	5-17(b)	
4.109	Violation reports	5-15	Refers reader to Section 8
4.110	Transfer to subsequent receiving state	5-07	
4.111	Return to sending state	5-16(b)	
4.112	Closing of supervision by receiving state	5-16	Several references to obsolete rules

ICAOs RULES AND CORRESPONDING ARKANSAS DOCC POLICY AND PROCEDURES MANUAL SECTIONS

<b>Chapter 5</b>	<b>Retaking</b>		
5.101	Retaking by the sending state	5-15	
5.102	New felony offense	5-15(b)	
5.103	Violations of conditions of supervision	5-15(b)	
5.104	Cost of retaking offender		
5.105	Time allowed for retaking offender		
5.106	Cost of incarceration in receiving state		
5.107	Officers retaking an offender in receiving state		
5.108	Opportunity for hearing in receiving state	5-15(a)	Review language with Legal Counsel, esp. para. 3, first sentence. PC Hearing may be waived, but is not "not necessary when offender admits to" a significant violation.
5.109	Transport of offenders		
5.110	Retaking offenders from state or federal correctional facilities		
5.111	Denial of bail to certain offenders		
5.112	Effect of special conditions or requirements		
<b>Chapter 6</b>	<b>Dispute Resolution and Interpretation of Rules</b>		
6.101	Informal communication to resolve disputes or controversies		
6.102	Formal resolution of disputes and controversies		
6.103	Enforcement actions against a defaulting state		
6.104	Judicial enforcement		

## Standards for Written Policies and Procedures for Interstate Compact Operations

- 0001 **Written policies and procedures govern the transfer of supervision of offenders to and from other jurisdictions. Transfer policies are in accordance with the Interstate Compact for Adult Offender Supervision.**

**Documentation:**

Section 5 – Transfer Case Management

Comment: Current version contains several errors or misstatements which may have applied to the “old” compact.

Recommendation: Needs further updating and editing with close attention to current ICAOS rules. Consider reorganizing chapter and section headings to make it easy for officers to find important information.

- 0002 **Written policies and procedures provide that acceptance, rejection, or termination of interest in cases shall not occur except through the Compact administrator’s office or a designated deputy.**

**Documentation:**

5-04 Interstate Compact Transfers: Procedures  
5-09 Interstate Compact Intakes  
5-17(c) Authority of Deputy Compact Administrator

Comment: Packets must go through IC office and rejected cases will be reviewed. Deputy Compact Administrator is responsible for all final decisions on IC cases.

Recommendation: Add explicit statement that all transfers must be with the involvement and concurrence of the compact administrator or designated deputy. If the Area Manager (?) is allowed to approve transfer requests and acceptances, that delegated duty should be stated.

- 0003 **Written policies and procedures provide that the receiving state shall complete and forward requested investigations within forty-five days of receipt to the sending state.**

**Documentation:**

5-06 Pre-Parole Investigations  
5-09 Interstate Compact Intakes

Comment: There is no reference to 45 days for receiving state to investigate probation case or parolee already in community. AR officers have 30 days from date received at field office.

Recommendation: Move the statement that a receiving state has 45 days to investigate a transfer from "5-06 Pre-Parole Investigations" to "5-04 Interstate Compact Procedures". It is more relevant to 5-04 and has broader applicability than to pre-parole requests.

**0004**      **Written policies and procedures provide that parolees and probationers shall sign all forms for movement to and/or acceptance in the receiving state.**

**Documentation:**

5-07 Transfer to a Subsequent Receiving State  
5-14 Content of Interstate Compact Forms

Comment: Except for 5-07, there is no explicit policy statement that an offender must sign all required ICAOS forms. These forms should also be mentioned in 5-06 since they must be forwarded to a receiving state at the time a travel permit is issued.

Recommendation: Add notations to 5-04, #'s 2, 3 and 4, indicating that offender's signature is required. Add to 5-06 the instructions for forwarding signed forms and immediate Request for Reporting Instructions.

**0005**      **Written policy, procedure, and practice provide that the receiving state should be given the opportunity to investigate the prospective plan of the individual prior to the individual being sent to the receiving state.**

**Documentation:**

5-03 (b) Mandatory Acceptance

Comment: This basic tenet is contained in the last sentence of the section. It may be easily overlooked.

Recommendation: Make this a prominent statement at the beginning of 5-04.

**0006**      **Written policies and procedures provide that no state shall refuse to supervise a parolee or probationer eligible under the Compact who meets the eligibility requirements.**

**Documentation:**

5-03 (a) Interstate Compact: Mandatory Acceptance  
5-03 (b) Mandatory Acceptance

Comment: Minor editing required. Compact name is incorrect in 5-03(a). Criteria do not exactly match ICAOS rules 3.101 or 3.101-1.

Recommendation: Edit to match ICAOS language.

**0007**      **Written policies and procedures provide that the receiving state shall assume supervision duties over probationers and parolees of any sending state transferred under the Compact and will apply equal standards of supervision and services that prevail for its own probationers and parolees.**

**Documentation:**

5-09 Interstate Compact Intakes

Comment: N/A

Recommendation: N/A

**0008**      **Written policies and procedures provide that the duration of the parole/probation period shall be determined by the sending state. The degree of supervision shall be determined by the receiving state.**

**Documentation:**

5-09 Interstate Compact Intakes  
5-17(f) Dual Supervision Cases  
5-17(j) Supervision

Comment: N/A

Recommendation: N/A

- 0009**     **Written policies and procedures provide that progress reports are required to be sent to the sending state on at least an annual basis.**
- Documentation:**
- 5-10 Reporting
- Comment: N/A
- Recommendation: N/A
- 
- 0010**     **Written policies and procedures provide that arrival reports shall be sent to the sending state immediately upon the offender's arrival within the receiving state.**
- Documentation:**
- 5-17(h) Arrival Notice
- Comment: "Arrival" has a special meaning under ICAOS. An offender may be present in AR, but has not "arrived" until s/he reports as instructed. At that point, AR assumes responsibility for supervision.
- Recommendation: Modify language to require Notice of Arrival immediately after the offender reports to the location and officials designated in the reporting instructions issued by the receiving state.
- 
- 0011**     **Written policies and procedures provide that the receiving state shall notify the sending state of significant violations within 30 days of becoming aware of the violation.**
- Documentation:**
- 5-15(b) Commission of New Felony Crime
- Comment: Mislabeled paragraph?
- Recommendation: Create new heading, "5-15(c) Significant Violations".

**0012**      **Written policies and procedures provide that offenders have the opportunity for a probable cause hearing in the receiving state, consistent with due process requirements.**

**Documentation:**

5-15(a) Probable Cause Hearings

Comment: Some language clearly refers to old rules and might not be precisely in synch with current ICAOS rules.

Recommendation: Review language with Legal Counsel, especially references to "if requested by the sending state" and when a hearing is not necessary.

**0013**      **Written policies and procedures provide that there is documentation that the Compact administrator has been duly appointed by the governor to administer the Interstate Compact, acting jointly with other administrators who will promulgate the rules and regulations of the Interstate Compact.**

**Documentation:**

Not in Manual.

Comment: Not applicable to ICAOS.

Recommendation: Delete this item from this instrument.

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Reviewer

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Date



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Jim Doyle  
Governor

Matthew J. Frank  
Secretary

## State of Wisconsin Department of Corrections

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June 1, 2006

G. David Guntharp, Director  
Department of Community Correction  
Two Union National Plaza, 2<sup>nd</sup> Floor  
105 West Capitol  
Little Rock, Arkansas 72201

Dear David:

On behalf of the Compliance Committee, I want to thank you again for the opportunity to visit your department and observe the operations of your Interstate Compact Section. I was able to test several types of instruments which could be applied to certification, evaluation or compliance auditing of a state's compact operations.

To recap, I conducted the following assessment activities:

- Interviewed Deputy CA Linda Strong;
- Reviewed eomis records and case files of randomly selected offenders transferring to and from Arkansas during 2005;
- Reviewed DCC Manual Section 5 – Transfer Case Management; and
- Reviewed the organizational structure and Position Descriptions of Interstate Compact Section staff.

Enclosed, you will find the results of my review. Please note there are four (4) distinct assessments:

- Interstate Compact Audit forms. These are the QSA forms developed for the *ad hoc* Audit Committee. The items and responses are general *qualitative* statements about policy and practice.
- Summaries of Single Case File Audits. These reports were adapted from the general QSA forms. They reflect *quantitative* results of the individual case reviews. Separate summaries are provided for Arkansas as the Receiving State and Arkansas as the Sending State. Each summary includes shaded items which apply to the *other* state. Those items are included since they may reflect important compliance issues.
- ICAOS Rules and Corresponding DCC Manual Sections. This table identifies the sections of the DCC Manual which describe or relate to ICAOS Rules. Identification of a section does not imply that the section completely covers all elements of a rule.
- Standards for Written Policies and Procedures. This is adapted from the ACA Standards for Interstate Compact. The assessment documents the presence or absence of written policy directing compliance with selected ICAOS requirements. It includes my own comments and recommendations, where applicable, for revisions to the DCC Manual.



Each assessment is still in development. I am very interested in your reactions to each approach. I am also interested in anything you or your staff believes to be inaccurate or misrepresented. It is important to know if I did not get an accurate picture of interstate operations in your state. At the same time, I want to remind you that the individual case file reviews cannot be assumed to reflect overall practice in Arkansas. The sample of cases is a very small percentage of the population and for many items it was not possible to determine the correct answer from the available material. Nonetheless, I believe there are several items which reflect important compliance issues and which suggest areas for further training.

Thanks again for your hospitality. All the staff I met were extremely helpful, friendly and accommodating. I thoroughly enjoyed the experience.

Sincerely,

William Rankin  
Commissioner

Quality Self-Assessment

Transfer-in  
to a Receiving State

QSA STEP	Transfer Request / Investigation	Action Occurs or is Expected? Yes / No / NA	Functional Responsibility Assigned to:	Supported by Written Policies, Procedures or Directives? (cite)	Follow-up Action Required?
<i>Rules 2.101, 3.101-2, 3.102, 3.103, 3.104, 3.106, 4.103, 4.105</i>	<b>Does the receiving state:</b>				
	Maintain records of issued / denied reporting instructions?	YES	CENTRAL OFFICE/ COMPACT SPECIALIST	NO	Add to CO/CS Manuals
	Establish controls for the timely receipt of sending states' Transfer Requests?	YES	COMPACT SPECIALIST/ LEDGER KEEPER	LEDGER MANUAL	Add to CS Manual
	Transmit Notices of Arrival when offenders' report or fail to report in accordance with issued reporting instructions?	YES	AGENT/ COMPACT SPECIALIST	DCC MANUAL 12.04.02	
	Withdraw its reporting instructions when offenders fail to report as instructed?	NO	CENTRAL OFFICE	NO	Clarify policy
	When reporting instructions are issued in line with 3.103 & 3.106, does supervision commence upon the offenders' arrival in the receiving state?	YES	AGENT	DCC MANUAL 12.04.01	
	Record the date Transfer Requests are received?	YES	CENTRAL OFFICE	NO	Add to Central Office Manual
	Notify a sending state of an incomplete request within five business days of receipt?	NO	CENTRAL OFFICE	DCC MANUAL 12.04.02	Add "5-day Notice" to DCC/CO Manuals
	Provide compact supervision to discretionary applicants?	YES	AGENT	DCC MANUAL 12.01.05; 12.04.01	
	Reply to Transfer Request within 45 days?	YES	AGENT	DCC MANUAL 12.04.02	
	Establish controls for receipt of field officers' Reply to Transfer Requests?	YES	COMPACT SPECIALIST/ LEDGER KEEPER	LEDGER MANUAL	ADD TO CS MANUAL
	Advise the sending state when it is unable to enforce a special condition?	YES	AGENT	DCC MANUAL 12.01.05	
	Field staff notify the Compact Office when a sending state's offender is present in the RS without the benefit of reporting instructions?	NO			N/A; FREQUENTLY HAPPENS, BUT NOT REQUIRED
	Do decisions to accept / reject Transfer Requests identify the compact criteria upon which the decision is based?	YES	AGENT	NO	N/A; COMPLETED ON ICAOS REPLY FORM

**Quality Self-Assessment**

**Transfer-in  
to a Receiving State**

Do decisions to accept / reject Transfer Requests have the concurrence of the compact administrator or designated deputy?	YES	COMPACT SPECIALIST	DCC MANUAL 12.01.02; 12.04.02	
When offender, present in the receiving state, is rejected, does the Reply to Transfer Request remind the SS to direct such offenders' return or when appropriate, issue a warrant?	NO		NO	NOT REQUIRED
<b>QSA STEP Supervision Rules</b>	Action Occurs or is Expected? Yes / No / NA	Functional Responsibility Assigned to:	Supported by Written Policies, Procedures or Directives? (cite)	Follow-up Action Required?
<b>3.108, 4.101, 4.103, 4.104, 4.106 through 4.112</b>				
<b>Does the receiving state:</b>				
Distinguish victim sensitive cases from other cases?	YES	AGENT	PARTIAL: DCC MANUAL 12.04.07	ADD TO DCC MANUAL
Use assessment tools to ensure offenders are supervised uniformly based upon their individual risks/needs?	YES	AGENT	DCC MANUAL, CH 3; CH 6; 12.04.01	
Apply equal standards of supervision, services and sanctions?	YES	AGENT	DCC MANUAL 12.04.01	
Are special conditions of supervision imposed based upon standards within the receiving state?	YES	AGENT	DCC MANUAL 12.04.01	
Notify the sending state when special conditions have been imposed?	YES	AGENT	DCC MANUAL 12.01.05	
Notify the offender of applicable offender registration and/or DNA testing requirements?	YES	AGENT	DCC MANUAL CH 3; CH 6	
Forward annual progress reports?	YES	AGENT	DCC MANUAL 12.04.03; LEDGER MANUAL	
Impose uniform supervision fees?	YES	AGENT	DCC MANUAL 12.01.05	CLARIFY SECTION
Assist sending states' in the collection of court-ordered financial obligations by directing the offender to submit	YES	AGENT	DCC MANUAL 12.01.05; 12.04.01	
Forward Offender Violation Reports on significant violations within thirty days of discovery?	YES	AGENT	DCC MANUAL 12.04.04	ADD 30-DAY LIMIT
Establish controls for receipt of Responses to Violation Reports?	YES	COMPACT SPECIALIST	NO	ADD TO CS MANUAL

**Quality Self-Assessment**

**Transfer-in  
to a Receiving State**

<p>When offenders propose a subsequent state transfer, are following rule provisions followed:                  Assisted the sending state in executing compact forms.                  Send a supervision summary to the Sending State                  Ensure offender remains in the receiving state until receipt of reporting instructions</p>	<p>YES                  YES                  YES</p>	<p>AGENT                  AGENT                  AGENT</p>	<p>DCC MANUAL 12.04.09                  DCC MANUAL 12.04.09                  DCC MANUAL 12.04.09</p>	
<p>Notice of Departure sent to the Sending State and Subsequent Receiving State</p>	<p>YES</p>	<p>AGENT</p>	<p>DCC MANUAL 12.04.09</p>	
<p>When offenders request to return to the Sending State, are reporting instructions requested prior to departure?</p>	<p>YES</p>	<p>AGENT</p>	<p>DCC MANUAL 12.04.07</p>	
<p>Send timely Case Closure Notices that include the offender's last known address and employment information?</p>	<p>YES</p>	<p>AGENT</p>	<p>DCC MANUAL 12.04.12</p>	<p>N/A;                  COMPLETED ON ICAOS                  "CLOSURE" FORM</p>

Quality Self-Assessment

Transfer-in  
to a Receiving State

QSA STEP	Retaking	Action Occurs or is Expected? Yes / No / NA	Functional Responsibility Assigned to:	Supported by Written Policies, Procedures or Directives? (cite)	Follow-up Action Required?
<i>Rules 4.112, 5.102, 5.103, 5.105, 5.108</i>					
<b>Does the receiving state:</b>					
Afford offenders in custody a probable cause hearing?	YES	AGENT	DCC MANUAL 12.04.04		
Forward the hearing examiner's report and evidence presented to the sending state?	YES	MAGISTRATE/ COMPACT SPECIALIST	DCC MANUAL 12.04.04		
Permit offenders to waive a probable cause hearing?	YES	AGENT	DCC MANUAL 12.04.04		
If so, is the offender provided with an explanation of his/her due process rights?	YES	AGENT	DCC MANUAL 12.04.04	N/A; INCLUDED ON DOC-414; 415	
Assure probable cause hearing waivers include an offender's admission to one or more significant violations?	YES	AGENT	DCC MANUAL 12.04.04		
Provide copies of court sentencing information when retaking is REQUESTED AFTER a new felony conviction?	YES	AGENT	DCC MANUAL 12.04.04		
Provide documentation supporting significant violations? i.e.: urinalysis testing results, photographs, notarized statements	YES	AGENT	DCC MANUAL 12.04.04		
Review Responses to Violation Reports to ensure sending states retake as required under 5.102 & 5.103?	YES	AGENT/ COMPACT SPECIALIST	NO	CREATE POLICY	
Establish controls to ensure the timely retaking of violators?	NO				NECESSARY?
Maintain interest in the case until the Sending State assumes custody?	YES	AGENT	DCC MANUAL 12.04.04		

**Quality Self-Assessment**

**Transfer-out  
from a Sending State**

QSA STEP	Transfer Request / Investigation	Action Occurs or is Expected? Yes / No / NA	Functional Responsibility Assigned to:	Supported by Written Policies, Procedures or Directives? (cite)	Follow-up Action Required?
<b>Rules 2.101, 3.101, 3.101-2, 3.102, 3.103, 3.104, 3.105, 3.106, 3.107, 3.108, 3.108-1, 4.103, 4.105</b> <b>Does the sending state:</b>					
Assure that offender remains in SS until investigation completed, unless 3.103 or 3.106 apply?	YES	AGENT	DCC Manual 12.01.05; 12.02.01		
Maintain records of requested reporting instructions?	YES	COMPACT SPECIALIST	NO	Add to Compact Specialist Manual	
Transmit Notices of Departure at the time offenders' depart for the Receiving State?	YES	SOCIAL WORKER/ AGENT/ COMPACT SPECIALIST	DCC Manual 12.02.04		
Track the receipt of offenders' Arrival Notices?	YES	CENTRAL OFFICE	NO	Add to Central Office Manual	
Take action when offenders fail to report as instructed?	YES	AGENT	YES- Training Material	Add to DCC Manual	
Notify the Receiving State when an offender or officer withdraws a transfer request?	YES	SOCIAL WORKER/ AGENT/ COMPACT SPECIALIST	YES- Training Material; DA IMP 300	Add to DCC Manual	
Establish controls for the timely submission of Transfer Requests [for offenders issued reporting instructions] ?	NO	COMPACT SPECIALIST	NO	Add to Compact Specialist Manual	
Record the dates Transfer Requests are received and the dates Transfer Requests are forwarded?	YES	COMPACT SPECIALIST	NO	Add to Compact Specialist Manual	
Provide victims the opportunity to be heard and comment on offenders' requests for transfer?	NO			Not required	
Notify interested victims of offenders' departure to or acceptance by another state?	NO			Not required	
Notify the Receiving State of offenders' special conditions and court-ordered financial obligations?	YES	AGENT	DCC Manual 12.02.04; 12.03.01		
Review Transfer Requests for completeness prior to submitting to a Receiving State?	YES	COMPACT SPECIALIST	DCC Manual 12.02.04	Expand in Compact Specialist Manual	
Review Reasons for Transfer to ensure verifications have been performed?	YES	COMPACT SPECIALIST	DCC Manual 12.02.04	Expand in Compact Specialist Manual	
Use the Eligibility Worksheet & Guide to determine offenders' eligibility for transfer?	NA	AGENT	Eligibility listed in DCC Manual 12.01.05	Not required	
Provide factual documentation to support discretionary Requests for Transfer?	NO	AGENT	NO	Not required	

**Quality Self-Assessment**

**Transfer-out  
from a Sending State**

Reply to a receiving state's request for missing Transfer Request materials within five business days?	YES	CENTRAL OFFICE/ COMPACT SPECIALIST	NO	Develop CO/CS "reminder"
Submit parole plans within 120 days of the offender's projected parole release date?	YES	SOCIAL WORKER	DAI IMP 300; DCC Manual 12.02.04	
Establish controls for the Receiving States' Reply to Transfer Requests?	YES	OATS LEDGER/ COMPACT SPECIALIST	Ledger Manual	Compact Specialist Manual
Review rejection decisions for appropriateness?	YES	COMPACT SPECIALIST	NO	Compact Specialist Manual
When plans are rejected for offenders who are on reporting instructions, are these offenders directed to immediately return to the sending state?	YES	AGENT	DCC Manual 12.02.04	
Is retaking initiated if such offenders fail to report as directed?	YES	AGENT	DCC Manual 12.02.04	
Reconsider compact transfer or modify/remove a special condition, when a RS advises it cannot enforce such condition(s)?	YES	AGENT	NO	Add to DCC Manual
<b>QSA STEP Supervision Rules</b>	Action Occurs or is Expected? Yes / No / NA	Functional Responsibility Assigned to:	Supported by Written Policies, Procedures or Directives? (cite)	Follow-up Action Required?
<b>3.106, 3.108, 3.108-1, 4.101, 4.103, 4.106 through 4.112</b>				
<b>Does the sending state:</b>				
Waive supervision fees for offenders who transfer to a receiving state?	YES	AGENT	DCC Manual 12.01.05; 12.02.04	
Notify interested victims when offenders' addresses change?	NO			Not required
Establish controls for receipt of annual progress reports?	YES	OATS LEDGER	Ledger Manual	
Track offenders' court-ordered monetary obligations and when not in compliance, provide notification to the receiving state?	YES	AGENT	DCC Manual 12.03.01	
Initiate Requests to Transfer to a subsequent receiving state?	YES	AGENT	DCC Manual 12.03.05	
When the receiving state advises that an emergency exists, request reporting instructions from the subsequent receiving state?	YES	AGENT/ COMPACT SPECIALIST	DCC Manual 12.02.04; 12.03.05	

**Quality Self-Assessment**

**Transfer-out  
from a Sending State**

Respond to requests for reporting instructions within 2 business days when offenders wish to relocate back to the sending state?	YES	CENTRAL OFFICE	DCC Manual 12.03.02	Add to Central Office Manual
Within 10 business days of receipt, submit Responses to Violation Reports which includes the action(s) to be taken?	YES	AGENT	DCC Manual 12.03.04	
Review Case Closure Notices to ensure it is appropriate for the receiving state to close compact interest?	YES	CENTRAL OFFICE/ COMPACT SPECIALIST	NO	Add to CO/CS Manuals
<b>QSA STEP Retaking</b>	Action Occurs or is Expected? Yes / No / NA	Functional Responsibility Assigned to:	Supported by Written Policies, Procedures or Directives? (cite)	Follow-up Action Required?
<b>Rules 5.101, 5.102, 5.103, 5.105, 5.108, 5.112</b>				
<b>Does the sending state:</b>				
Have the receiving state's consent to retake the offender when criminal charges remain undisposed?	YES	CENTRAL OFFICE/ DCC Extradition Office	DCC Manual 12.03.04	
Review the retaking request to determine whether it is requested or required?	YES	AGENT	DCC Manual 12.03.04	
Ensure that the offender has been provided opportunity for a probable cause hearing in the receiving state?	YES	AGENT	DCC Manual 12.03.04	
Assure probable cause hearing waivers include an offender's admission to one or more significant violations?	YES	AGENT	DCC Manual 12.03.04	
Complete the retaking of an offender within 30 days of availability for transport?	YES	DCC Extradition Office	NO	Not required. Retake upon availability.
Enforce special conditions imposed by the receiving state?	YES	AGENT	NO	Not required.



**INTERSTATE COMMISSION FOR ADULT OFFENDER SUPERVISION  
ON-SITE AUDIT PLAN**

AGENCY	
AGENCY CONTACT	PHONE:  E-MAIL:
PRINCIPAL AUDITOR:  AUDIT TEAM:	PHONE: E-MAIL:  PHONE: E-MAIL:  PHONE: E-MAIL:  PHONE: E-MAIL:
PURPOSE OF AUDIT / ISSUES TO BE ADDRESSED:	
TARGET POPULATION: (Describe in detail; identify any unique characteristics)	
DECISION RULE:	
AUDIT SCHEDULE: <ul style="list-style-type: none"> <li>• Introductory letter and list of requirements</li> <li>• Pre-audit documents due</li> <li>• Final pre-audit plan meeting, allocation of expenses</li> <li>• On-site data collection</li> <li>• Preliminary report to audited jurisdiction</li> <li>• Jurisdiction response</li> <li>• Final Report and recommendations</li> </ul>	DATE TO BE COMPLETED:

**AUDIT METHOD**

Pre-audit documents to be reviewed:

- Description of subject population
- Jurisdiction organizational chart and description of functional Responsibilities
- Relevant, written policies and procedures
- Description of information systems, data fields and operational definitions
- Other:

Records/IMS Contact

Phone

E-Mail:

Records to be reviewed: (format, location, access)

Sample size and sampling method

Data collection instruments

Data storage and confidentiality

Critical issues or concerns

**APPROVALS:**

\_\_\_\_\_

Agency Representative

Date \_\_\_\_\_

\_\_\_\_\_

ICAOS Representative

Date \_\_\_\_\_