



## COMPLIANCE COMMITTEE REPORT

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**To:** Commissioners of the Interstate Commission for Adult Offender Supervision

**From:** Allen Godfrey, Chair, Compliance Committee and Commissioner, State of Minnesota

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### Compliance Committee Members

Allen Godfrey (MN), Chair, Commissioner	Amy Vorachek (ND), Commissioner
Hope Cooper (KS), Commissioner	Dale Crook (VT), Commissioner
Gloriann Moroney (MA), Commissioner	Diann Skiles (WV), Commissioner
Cathy Gordon (MT), Commissioner	Jacey Rader (NE), Ex-officio, DCA
Sally Reinhardt-Stewart (NE), Commissioner	Suzanne Brooks (OH), Ex-officio, DCA

The Compliance Committee is responsible for monitoring compliance of member states with the terms of the Compact and the Commission's rules. In addition, the committee is responsible for developing appropriate enforcement procedures for the Commission's consideration.

### Goals and Objectives

1. Review compliance issues and make fair and consistent recommendations if necessary.
2. Meet and review compliance issues within 30 days of referral.
3. Develop processes to enhance proactive compliance by monitoring trends and working collaboratively with other committees.
4. Develop processes for improving dashboard outcomes

### Compliance Issues and Outcomes

During the reporting year, the Committee reviewed and made recommendations to the Executive Committee on the following matters:

- **December 21, 2021:** The Compliance Committee added a new goal of reviewing the dashboard compliance outcomes to determine if new measures should be established or current outcomes removed. To establish a process for determining, the Committee recommend reviewing the following: past compliance audit results, complaints filed with the National Office, and surveying the deputy compact administrators on areas that further compliance outcome dashboard measures may be helpful.

The Committee also reviewed a complaint referred by the National Office for failing to issue a nationwide warrant. The complaint was substantiated and was resolved prior to the Compliance Committee meeting. While no formal action was referred to the Executive Committee, the state was required to provide a written response to the Compliance Committee on how they are going to remedy future issues of nationwide warrants. The Committee received the state's written response and was approved on the March 17, 2022, meeting.

- **March 17, 2022:** The Committee reviewed the FY22 audit on discretionary transfers in comparison from FY2015 to FY2022 data. Upon review of the total acceptance rates, they slightly increased as Commission in FY2015 from 76.3% to 79.1%. A modest increase of 9%. In addition, 70% of the rejections were due to failing to verify transfer plans and provide sufficient justification in the transfer request. This highlighted that sending states can play a significant role to increase their overall acceptance rates for outgoing cases. The Committee recommended highlighting the results at the upcoming annual business meeting and the sending states will start to receive their acceptance statistics twice a year starting on January 1, 2023.

The Compliance Committee reviewed the FY2023 audit plan on reviewing data entry accuracy. Correct data entry and cleaning up duplicate clients in our system are vital to ensuring outcome reporting is accurate. The FY2023 audit will focus on the following ICOTS data elements: demographic; photo; junk/duplicate client profiles; rejected cases and clients awaiting retaking. The committee recommended the Executive Committee approve the FY2023 data integrity audit.

Lastly, the Committee discussed the 2021 State Council Report, finding that most states met the policy requirement to have a council with required named members for executive, legislative, judicial, and victims' advocate. As evidenced by the 15 states that did not report a meeting in 2021, the policy did not create an expectation for meetings to be held. Discussion about how to manage the important role of functioning state councils was therefore placed on the agenda for the 2022 annual business meeting.

- **May 11, 2022:** The Compliance Committee reviewed a survey from the DCA Liaison Committee to evaluate compliance measures, identify deficiencies, and determine what if any compliance standards/tools should be added to the compliance summary and quarterly emails. The committee reviewed current compliance quarterly emails and options for additional data. While the Committee recommended no changes to the current compliance dashboards, the Committee did recommend, in addition to the transfer acceptance rates sent out quarterly, to also include data on retaking. The Committee also agreed to audit the compliance dashboards every other year.

### **Dashboard Trends**

States' adherence to the outcomes measured across the compliance dashboard continued to trend well above the 80 percentiles in all six primary categories in the last five years and in all primary categories in the last three years.

<b>Compliance Standard</b>	<b>FY 2018</b>	<b>FY 2019</b>	<b>FY 2020</b>	<b>FY 2021</b>	<b>FY 2022</b>	<b>5 Year Change</b>	<b>3 Year Change</b>
Case Closure Notices	96.2%	96.2%	96.4%	96.8%	95.9%	<b>-0.3%</b>	<b>-0.5%</b>
Case Closure Replies	90.1%	91.1%	92.0%	92.4%	91.8%	<b>1.7%</b>	<b>-0.2%</b>
Requested Progress Reports	88.1%	88.8%	91.1%	91.5%	90.1%	<b>2.0%</b>	<b>-1.0%</b>
Violation Responses	86.1%	88.2%	88.7%	89.9%	88.2%	<b>2.1%</b>	<b>-0.5%</b>
Transfer Request Replies	92.0%	93.2%	93.2%	94.0%	93.4%	<b>1.4%</b>	<b>0.2%</b>
RFRI Replies	97.1%	97.8%	97.4%	97.9%	97.4%	<b>0.3%</b>	<b>0.0%</b>

Respectfully submitted,

*Allen Godfrey*

Allen Godfrey  
Chair, Compliance Committee  
Commissioner, State of Minnesota