

# Department of Corrections and Rehabilitation

## The Benefits of Its Correctional Offender Management Profiling for Alternative Sanctions Program Are Uncertain

### REPORT NUMBER 2010-124, ISSUED SEPTEMBER 2011

Our report concludes that the benefits from the Department of Corrections and Rehabilitation's (Corrections) use of the Correctional Offender Management Profiling for Alternative Sanctions Program (COMPAS) are, at best, uncertain. Specifically, Corrections' use of COMPAS in its reception centers—facilities where inmates entering the correctional system are evaluated and assigned to a prison—does not meaningfully affect its decision making concerning prison assignments, and by extension, the rehabilitative programs inmates might access at those facilities. Further, the COMPAS core assessment identifies up to five different needs; however, Corrections has rehabilitative programs that address only two. Corrections has not established regulations defining how COMPAS assessments are to be used despite legal requirements to do so.

Our review also revealed other problems with Corrections' deployment of COMPAS that negatively affect its usefulness. Some correctional staff we spoke with at reception centers and parole offices indicated a lack of acceptance of COMPAS, suggesting the need for further training or clarification regarding COMPAS's value. Further, Corrections' use of COMPAS for placing inmates into its in-prison rehabilitative programs is limited to its substance abuse program. However, we found that many in this program either lack COMPAS assessments or have a low COMPAS-identified need for substance abuse treatment. Moreover, relatively few inmates with moderate to high substance abuse treatment needs, as determined through the COMPAS core assessment, are assigned to a treatment program. Finally, we found that Corrections lacks accounting records demonstrating how much it cost to fully deploy and implement COMPAS at its reception centers, prisons, and parole offices.

In the report, the California State Auditor (state auditor) made the following recommendations to Corrections. The state auditor's determination regarding the current status of recommendations is based on Corrections' response to the state auditor as of September 2012.

#### **Recommendation 1.1.a—See pages 21, 37, and 38 of the audit report for information on the related finding.**

To ensure that the State does not spend additional resources on COMPAS while its usefulness is uncertain, Corrections should suspend its use of the COMPAS core and reentry assessments until it has issued regulations and updated its operations manual to define how Corrections' use of COMPAS will affect decision making regarding inmates, such as clarifying how COMPAS results will be considered when sending inmates to different prison facilities, enrolling them in rehabilitative programs to address their criminal risk factors, and developing expectations for those on parole.

#### ***Corrections' Action: No action taken.***

Corrections stated that it does not agree with our recommendation to temporarily suspend its use of COMPAS. During the audit, we had noted that COMPAS did not play a significant role when deciding where inmates should be housed, and by extension, the rehabilitative programs they receive at those prison facilities. Instead, Corrections' staff more frequently considered other factors, such as an inmate's security level and available bed space.

Corrections has not suspended its use of COMPAS and has not developed regulations that are responsive to our recommendation. In May 2012 Corrections adopted emergency regulations that defined COMPAS and required its use for those inmates entering the correctional system and those undergoing their annual reviews. Further, the emergency regulations require Corrections' staff to use COMPAS assessments when determining the inmate's placement into rehabilitative programs.

However, the regulations do not clarify how COMPAS results will be acted upon given the importance of other inmate factors. As a result, it remains unclear if COMPAS will meaningfully influence inmate placement in rehabilitative programs. Finally, Corrections' parole staff acknowledged that they have not developed regulations defining the appropriate use of COMPAS for those beginning parole.

**Recommendation 1.1.b—See page 29 of the audit report for information on the related finding.**

To ensure that the State does not spend additional resources on COMPAS while its usefulness is uncertain, Corrections should suspend its use of the COMPAS core and reentry assessments until it has demonstrated to the Legislature that it has a plan to measure and report COMPAS's effect on reducing recidivism. Such a plan could consider whether inmates enrolled in a rehabilitative program based on a COMPAS assessment had lower recidivism rates than those provided rehabilitative programming as a result of non-COMPAS factors.

*Corrections' Action: No action taken.*

- ➔ Corrections did not provide a plan or methodology for considering whether inmates enrolled in rehabilitative programs as a result of COMPAS had lower recidivism rates once released. Corrections indicated that it plans to provide some information on recidivism rates for those receiving a COMPAS assessment sometime in the fall of 2012. Finally, Corrections' response did not indicate that it communicated with the Legislature regarding how it plans to measure COMPAS' usefulness.

**Recommendation 1.2.a—See pages 19, 20, and 37 of the audit report for information on the related finding.**

Once Corrections resumes its use of COMPAS core and reentry assessments, it should provide ongoing training to classification staff representatives, parole agents, and others that may administer or interpret COMPAS assessment results to ensure that COMPAS is a valuable inmate assessment and planning tool.

*Corrections' Action: No action taken.*

- ➔ Corrections provided employee sign-in sheets as evidence that it provided training to certain correctional staff, along with examples of the material provided at these training sessions. These training materials are primarily related to conducting COMPAS assessments and thus it does not appear that the training helps ensure that COMPAS plays a more prominent role in inmate decision making and that Corrections' staff has a better understanding of how to use COMPAS now than they did at the time of our audit.

**Recommendation 1.2.b—See pages 28 and 36 of the audit report for information on the related finding.**

Once Corrections resumes its use of COMPAS core and reentry assessments, it should develop practices or procedures to periodically determine whether its staff are using COMPAS core or reentry assessments as intended. Such a process might include performing periodic site visits to corroborate that COMPAS is being used as required.

*Corrections' Action: Partially implemented.*

According to Corrections, it has completed an initial draft of the site visit process and a final version will be prepared for executive review. In addition, Corrections reported that it has completed an initial draft of a weekly COMPAS report that will outline issues identified during the site visits and is soliciting feedback on the report from staff. However, Corrections did not provide any evidence to corroborate its assertions.

**Recommendation 1.2.c—See page 23 of the audit report for information on the related finding.**

Once Corrections resumes its use of COMPAS core and reentry assessments, it should develop practices or procedures to periodically compare the demand for certain rehabilitative programs, as suggested by a COMPAS core assessment, to the existing capacity to treat such needs.

***Corrections' Action: Partially implemented.***

Corrections asserts that it has fully implemented this recommendation, but we disagree. Corrections indicates that it provides monthly data reports that show the number of inmates with medium to high needs—based on a COMPAS assessment—that are in rehabilitative programs, citing evidence it provided to us during an earlier response. Although we saw at one time Corrections tracked whether inmates in its substance abuse program had medium or high COMPAS scores, Corrections did not provide evidence to demonstrate that this practice is still taking place for both its substance abuse and other rehabilitative programs. Further, Corrections did not provide evidence that it was using COMPAS scores to determine which rehabilitative programs are needed the most and where.

**Recommendation 1.3.a—See pages 39 and 40 of the audit report for information on the related finding.**

To ensure transparency and accountability for costs associated with information technology projects such as COMPAS, Corrections should disclose that it lacks accounting records to support certain COMPAS expenditure amounts it reported to the California Technology Agency and seek guidance on how to proceed with future reporting requirements for its deployment of the COMPAS core assessment to its adult institutions.

***Corrections' Action: Fully implemented.***

Corrections' staff met with the California Technology Agency in October 2011 and disclosed that it lacked accounting records to support certain COMPAS expenditures that Corrections has been submitting to the California Technology Agency. The California Technology Agency stated that Corrections' reporting of COMPAS costs were appropriate.

**Recommendation 1.3.b—See page 40 of the audit report for information on the related finding.**

To ensure transparency and accountability for costs associated with information technology projects such as COMPAS, Corrections should develop policies to ensure that accounting or budget management personnel are involved in the project planning phase of future information technology projects so that appropriate accounting codes are established for reporting actual project costs.

***Corrections' Action: Fully implemented.***

Corrections has modified its project management manual to require those responsible for information technology projects to obtain an accounting code—referred to as a functional area code—from Corrections' budget and accounting staff. Corrections provided us with revisions to its policy manuals and cost-tracking tools to demonstrate it had implemented our recommendation.

