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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

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information systems. All of the employees of the 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 course of the audit shall be handled in a confidential manner. 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 functionally 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. Prior to 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 with four or more standards the State or US Territory will be required to submit a

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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.

IX. Appendix 1: ICAOS Audit Standards

Appendix 1

ICAOS Audit Standards

3.101-1, 3.101-3 (c), 3.103 (a)(2) & 3.106 (a)(2)(A): With regard to the transfer of military members, offenders who live with family who are members of the military, employment transfer of family members, employment transfer of offenders, military veterans referred for treatment, probationers who live in the receiving state at the time of sentencing and expedited requests, the receiving state issues reporting instructions no later than two (2) business days following receipt of such a request from the sending state. For sex offenders living in the receiving state at the time of sentencing, the receiving state issues reporting instructions no later than 5 business days.

3.104: The receiving states shall complete the investigation and respond to a sending state's request for an offender's transfer of supervision no later than the 45th calendar day following receipt of a completed transfer request in the receiving state's compact office.

4.102 & 4.112 (a) (1)&(c): The receiving state shall supervise an offender transferred under the interstate compact for a length of time determined by the sending state and the state will transmit a case closure for offenders within 10 business days after the "Supervision End Date" provided by the sending state.

4.112 (d): The sending state shall submit the case closure notice reply to the receiving state within 10 business days of receipt of the case closure notice.

4.105(a): At the time of an offender's departure from any state pursuant to a transfer of supervision or the granting of reporting instructions, the sending state shall transmit a notice of departure.

4.105(b): At the time of an offender's arrival in any state pursuant to a transfer of supervision or the granting of reporting instructions, or upon the failure of an offender to arrive as instructed, the intended receiving state shall transmit a notice of arrival to the sending state.

4.106 (annual progress report): The receiving state shall provide to the sending state a progress report annually.

4.106 (requested progress report): The receiving state shall provide to the sending state a progress report upon the request of the sending state. The receiving state shall provide the progress report within 30 calendar days of receiving the request.

4.109(c): The sending state shall respond to a report of a violation made by the receiving state no later than 10 business days following transmission by the receiving state. The response by the sending state shall include action to be taken by the sending state and the date by which that action will begin and its estimated completion date.

Misc 101: Compact office regularly identifies and deletes duplicate offender files.

Misc. 102: Every ICOTS user must have a signed and approved user agreement.

Misc. 103: Compact office deactivates ICOTS users, who have not logged into ICOTS in 12 months or more.

Misc. 104: Every commissioner must submit to the Commission written verification that the appointment complies with the member's state compact statute.