



STATE OF MICHIGAN  
DEPARTMENT OF CORRECTIONS  
LANSING

RICK SNYDER  
GOVERNOR

DANIEL H. HEYNS  
DIRECTOR

November 25, 2014

Office of Internal Audit Services  
Office of the State Budget  
George W. Romney Building  
111 South Capitol, 6<sup>th</sup> Floor  
Lansing, MI 48913

Dear Internal Audit Operations Division:

In accordance with the State of Michigan, Financial Management Guide, Part VII, attached is a summary table identifying our responses and a corrective action plan to address the recommendations contained within the Office of the Auditor General's performance audit of the Prisoner Education Programs covering the period October 1, 2010 through June 10, 2013.

Please direct questions regarding the summary table or corrective action plans to Julie Hamp at (517) 335-6886.

Sincerely,

Signature Redacted

Dan Heyns, Director

Attachment

DH/22/cm

c: Executive Office  
Office of the Auditor General  
House Fiscal Agency  
Senate Fiscal Agency  
House Appropriations Sub-Committee on Corrections  
Senate Appropriations Sub-Committee on Judiciary and Corrections  
House Judiciary Committee  
Senate Judiciary Committee  
T. Combs            H. Gay  
C. MacKenzie      R. Treacher

Audit recommendations the agency will comply with:

1. Expected compliance date: July 2015
2. Expected compliance date: February 2015
3. Expected compliance date: December 2014

Audit recommendations the agency disagrees with:

None

**1. Evaluation Process**

The auditors recommended that DOC implement all the components of a comprehensive process to evaluate the effectiveness and efficiency of its prisoner education programs.

Agency Preliminary Response

*DOC agrees with the recommendation and has taken steps to comply.*

*DOC agrees that gathering and analyzing post-release data, such as employment status and continued education, on parolees who participated in the education programs would be a good practice. As part of its employment readiness focus, DOC has hired 8 employment counselors and expects to hire 13 additional employment counselors by January 2015. These positions will track post-release data. DOC has scheduled professional development in February 2015 to ensure standardization and consistency in gathering, analyzing, and tracking this data.*

*DOC also agrees that using prisoner data reported to and performance standards established by the Workforce Development Agency to evaluate its ABE program is a good practice and has been doing this informally. DOC, through its education manager and Academic Committee, will formally document its efforts to annually monitor and evaluate EFL gains within its schools. DOC has also hired a departmental specialist to monitor performance standards established by WDA and the federal government.*

*DOC is updating its monthly reporting system to better differentiate between CTE tier completions and to track employment readiness completions.*

*DOC already has many components in place to monitor the effectiveness and efficiency of its prisoner education programs. The DOC's processes include output and quality monitoring and reporting practices such as internal performance audits, school audits, boilerplate reporting, MiScorecard performance metric reporting, internal monthly reporting, the Michigan Adult Education Reporting System updating, DOC's Offender Education Tracking System (OETS) maintenance, biannual ABE testing, individual prisoner EFL tracking, prisoner GED completion and CTE completion tracking, and advisory committee meetings.*

**2. Classroom Utilization**

The auditors recommended that DOC identify and investigate correctional facilities that did not maintain prisoner classroom enrollments at the recommended capacity.

Agency Preliminary Response

*DOC agrees with the recommendation and has complied by updating classroom enrollment standards and requiring schools that fall below the classroom enrollment standards to explain the reasons on their monthly reports. DOC will overfill classrooms bi-weekly, to the extent practical given space limitations and the demands on school administration staff.*

*As noted in the audit report, the teacher hour utilization rate was 94% and its classroom utilization rate was 90%. It is unrealistic to expect facilities to achieve 100% compliance with the*

*recommended classroom size due to security risks, prisoner transfers and disciplinary actions, special education needs, space limitations, and staff leave usage.*

### **3. Title I Federal Funding**

The auditors recommended that DOC request Title I (State Agency Program for Neglected and Delinquent Children and Youth) federal funding for all eligible prisoners.

The auditors also recommended that DOC ensure that it enrolls otherwise eligible prisoners in the required hours of educational instruction in order to obtain additional Title I federal funding.

#### Agency Preliminary Response

*DOC agrees with the recommendations and has taken steps to comply. DOC continues to work with DTMB to correct the query used to identify prisoners who were enrolled in 15 or more hours of educational instruction. DOC has required each school to perform and report a monthly manual headcount of these prisoners and compares the headcount reports to the query results to ensure that it requested Title I funding for all eligible prisoners. Additionally, DOC hired a departmental specialist to monitor Title I headcounts to ensure it appropriately captures Title I data to meet eligibility requirements.*

*DOC has sent and will continue to send out a reminder every September to prompt schools to give priority enrollment to Title I eligible students leading up to count day. However, enrolling and meeting the Title I requirements for all prisoners who would otherwise be eligible for funding is difficult because of safety and security concerns in higher security level facilities; classroom space limitations; prisoner transfers; and movement schedules at facilities where it is important to prevent mixing of prisoners at security levels. For example, the Thumb Correctional Facility has Holmes Youthful Trainee Act prisoners who cannot mix with the regular adult population; however, DOC will attempt to address this by moving additional resources to that facility.*

*In addition, DOC is now operating the SAI School and will count these students going forward.*