

Office of the Auditor General
Performance Audit Report

**Special Alternative Incarceration
Program for Men**

Michigan Department of Corrections

September 2020

The auditor general shall conduct post audits of financial transactions and accounts of the state and of all branches, departments, offices, boards, commissions, agencies, authorities and institutions of the state established by this constitution or by law, and performance post audits thereof.

The auditor general may make investigations pertinent to the conduct of audits.

Article IV, Section 53 of the Michigan Constitution



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Report Summary

Performance Audit
Special Alternative Incarceration Program
for Men
Michigan Department of Corrections
(MDOC)

Report Number:
471-0202-19

Released:
September 2020

MDOC's Special Alternative Incarceration Program (SAI) for men operates as an alternative prison program for selected male prisoners and probationers who were convicted of certain crimes. SAI is a 90-day intensive program that focuses on developing the offender's self-esteem and self-discipline, sense of individual responsibility, and positive work ethic. For fiscal year 2018, SAI graduated 817 trainees and incurred total expenditures of \$13.5 million, at an average cost of \$16,524 per trainee graduate.

Audit Objective			Conclusion
Objective #1: To assess the effectiveness of SAI's eligibility screening, intake, and discharge processes.			Effective
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
None reported.	Not applicable.		

Audit Objective			Conclusion
Objective #2: To assess SAI's compliance with policies and procedures related to safety and security.			Partially complied
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
SAI did not subject 16% of trainees and 6% of staff and volunteers entering the secure perimeter gate to screening by a metal detector. Also, SAI did not require 41% of staff and volunteers entering or exiting the gate and 55% of the trainees and graduates exiting the gate to show identification (Finding #1).	X		Agrees
SAI did not document that it conducted 9% of the required cell searches and 7% of the required trainee shakedowns and did not search 8% of the cells. Also, SAI documented 16 (62%) cell searches that it did not conduct and conducted 6 (23%) cell searches within 6 to 84 seconds (Finding #2).	X		Agrees

Findings Related to This Audit Objective (Continued)	Material Condition	Reportable Condition	Agency Preliminary Response
SAI did not conduct 13% of the base station radio checks and conducted 27% of the individual radio checks 6 to 42 minutes late (<u>Finding #3</u>).		X	Agrees
SAI did not properly complete at least 40% of gate manifests (<u>Finding #4</u>).		X	Agrees
SAI could not support that it provided safety and tool training to 30 (44%) of the 68 trainees that we selected for review. Also, SAI was not timely in training 14% of the trainees that we selected, ranging from 7 to 45 days after the trainees appeared on the May 2019, June 2019, or July 2019 work rosters (<u>Finding #5</u>).		X	Agrees
We identified several concerns relating to gate pass and public works assignments, including SAI consistently allowing trainees to work outside of the secure perimeter without securing the outer entrance gate and inappropriately allowing trainees to work as porters in the administration building prior to being enrolled in SAI for the minimum required period (<u>Finding #6</u>).		X	Agrees

Audit Objective			Conclusion
Objective #3: To assess SAI's compliance with policies and procedures related to food service.			Complied
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
None reported.			Not applicable.

Audit Objective			Conclusion
Objective #4: To assess the sufficiency of MDOC's efforts to evaluate the benefits of SAI.			Sufficient, with exceptions
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Our analyses indicated that SAI offers a cost savings to the State; however, outcome measures predominantly indicated higher return to custody or supervision rates and higher abscond rates (<u>Finding #7</u>).		X	Agrees

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Doug A. Ringler, CPA, CIA
Auditor General

September 24, 2020

Ms. Heidi E. Washington, Director
Michigan Department of Corrections
Grandview Plaza Building
Lansing, Michigan

Dear Ms. Washington:

This is our performance audit report on the Special Alternative Incarceration Program for Men, Michigan Department of Corrections.

We organize our findings and observations by audit objective. Your agency provided preliminary responses to the recommendations at the end of our fieldwork. The *Michigan Compiled Laws* and administrative procedures require an audited agency to develop a plan to comply with the recommendations and to submit it to the State Budget Office upon completion of an audit. Within 30 days of receipt, the Office of Internal Audit Services, State Budget Office, is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

We appreciate the courtesy and cooperation extended to us during this audit.

Sincerely,

Doug Ringler
Auditor General

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AUDIT OBJECTIVES, CONCLUSIONS, FINDINGS, AND OBSERVATIONS

ELIGIBILITY SCREENING, INTAKE, AND DISCHARGE PROCESSES

BACKGROUND

Sections 771.3b and 791.234a of the *Michigan Compiled Laws* provide eligibility criteria for participation in the Special Alternative Incarceration Program (SAI) and preclude participation for offenders convicted of certain assaultive crimes. SAI screens all newly committed Michigan Department of Corrections (MDOC) prisoners* and probationers* referred to SAI by the sentencing judge and follows up with offenders who could become eligible in the future. Also, offender consent and the sentencing judge's approval are required before the offenders can be placed in SAI.

SAI's intake* process includes a two-week orientation program, during which trainees* become familiar with SAI rules and are assessed for needed programming and training such as General Educational Development (GED) classes.

Trainees who successfully complete their assigned programming and training are discharged from SAI to a predetermined parole or probation period. Trainees who voluntarily terminate from SAI or are terminated because of rule violations or medical conditions are transferred to a traditional MDOC correctional facility or returned to probation.

AUDIT OBJECTIVE

To assess the effectiveness* of SAI's eligibility screening, intake, and discharge processes.

CONCLUSION

Effective.

FACTORS IMPACTING CONCLUSION

- SAI evaluated the program eligibility of 99.8% of the MDOC prisoners committed from October 1, 2017 through August 14, 2019.
- SAI ensured that all trainees admitted to the program that we reviewed were eligible.
- SAI systematically evaluated and monitored potential future eligibility of MDOC prisoners and probationers during the audit period.
- SAI provided the required coursework and individualized programming identified during the intake process for all 50 discharged trainees that we reviewed.

* See glossary at end of report for definition.

COMPLIANCE WITH SAFETY AND SECURITY POLICIES AND PROCEDURES

BACKGROUND

The Special Alternative Incarceration Facility (Facility), located in Chelsea, exclusively housed 152 to 278 minimum security (level I)* prisoners and probationers (SAI trainees) as of the first day of each month from October 2017 through June 2019.

SAI operates under the policy directives and operating procedures established by MDOC and operating procedures developed by SAI. These policies and procedures were designed to have a positive impact on the safety and security of SAI trainees and staff and to help ensure that trainees receive proper care and services. They address numerous aspects of SAI's operations, including:

- Gate access
- Cell searches* and area searches*
- Trainee shakedowns*
- Radio checks
- Gate manifests*
- Training
- Gate pass and public works*
- Tool control

Although compliance with these policies and procedures contributes to a safe and secure prison, the nature of the prison population and environment is unpredictable and inherently dangerous. Therefore, compliance will not eliminate safety and security risks.

On March 7, 2020, MDOC relocated the SAI operations to the Cooper Street Correctional Facility in Jackson.

AUDIT OBJECTIVE

To assess SAI's compliance with policies and procedures related to safety and security.

CONCLUSION

Partially complied.

FACTORS IMPACTING CONCLUSION

- SAI did not achieve compliance in 7 of the operational areas listed above as noted in the material conditions* related to monitoring secure perimeter access and completing cell searches and trainee shakedowns (Findings #1 and #2) and the reportable conditions* related to completing radio checks and gate manifests, providing training to trainees, and complying with security procedures for gate pass* and public works assignments (Findings #3 through #6).

* See glossary at end of report for definition.

- SAI substantially complied with policies and procedures related to tool control.
- Our limited review of other operational areas, such as key control, prisoner counts, and fire safety, did not identify significant concerns that warranted the additional use of our audit resources beyond our preliminary survey.

FINDING #1

Improved monitoring of access to secure perimeter needed.

16% of trainees and 6% of staff and volunteers were not screened by a metal detector upon entering the secure perimeter.

73% of trainees did not show identification upon exiting the secure perimeter.

SAI did not properly monitor staff, volunteers, and trainees entering and exiting the secure perimeter, increasing the risk of contraband* entering the secured perimeter and escape.

SAI operating procedure 04.04.100k requires all individuals entering the secure perimeter to walk through the metal detector or be screened by the use of a handheld metal detector. The operating procedure also requires that all individuals entering or exiting the secure perimeter show their identification to the gate officer and that an officer maintains continuous visual observation of trainees re-entering the secure perimeter.

We reviewed selected first and second shift video surveillance of staff, volunteers, and trainees entering and exiting the secure perimeter gate on 13 days from August 6, 2019 through August 30, 2019. We noted the following:

- a. 24 (15.9%) of the 151 trainees and 11 (6.0%) of 184 staff and volunteers entering the gate did not walk through the metal detector or get screened by a handheld metal detector, including 2 trainees who had not been under continuous supervision.
- b. 125 (40.8%) of the 306 staff and volunteers entering or exiting the gate did not show identification.
- c. 11 (20.4%) of the 54 graduates exiting the gate were not required to show identification cards and were not verified against the release clearance form.
- d. 72 (73.5%) of the 98 trainees exiting the gate did not show identification and were not verified against the trainee detail form. An additional 3 (3.1%) of the 98 trainees showed their identification cards but were not verified against the trainee detail form.
- e. 129 (86.6%) of 149 trainees entering the gate did not show identification, including 32 (21.5%) trainees who had not been under continuous supervision.

We consider this finding to be a material condition because of the significance of the combined exception rates; the potential for escape; and, together with the deficiencies identified in Finding #2, the impact that contraband could have on the safe operation of SAI.

RECOMMENDATION

We recommend that SAI ensure that all staff, volunteers, and trainees entering and exiting the secure perimeter are properly monitored.

* See glossary at end of report for definition.

**AGENCY
PRELIMINARY
RESPONSE**

MDOC provided us with the following response:

Agrees.

Effective March 7, 2020 MDOC relocated SAI inside the secure perimeter of Cooper Street Correctional Facility (JCS).

Plan of Action: SAI OP 04.04.100k has been retired. Information regarding searches has been included in SAI Intake procedure OP 05.01.141. All trainees will be screened by a metal detection device and be in possession of appropriate identification before entering the facility through the front gates and/or sallyport.

FINDING #2

Conducting and documenting cell searches and trainee shakedowns need improvement.

SAI may not have conducted all required cell searches and trainee shakedowns, which decreases the likelihood of detecting and confiscating contraband and compromises the safety and security of staff and trainees. Also, SAI documented that it conducted cell searches that either were not conducted or were conducted in unrealistically short periods of time.

SAI operating procedure 04.04.110 requires that each first and second shift officer assigned to a housing unit conduct thorough and complete searches of at least two randomly selected trainee cells (bunks) per shift and record them in the logbook. The operating procedure also requires that each cell (bunk) be searched at least once per month. In addition, the operating procedure requires each corrections officer who has direct trainee contact to conduct pat-down searches or clothed-body searches of at least five randomly selected trainees per first and second shift and record them on the daily trainee shakedown report and in the appropriate logbook.

We reviewed SAI's cell search and trainee shakedown documentation and surveillance video as follows:

- a. Our review of cell search records and trainee shakedown records for September 14, 2018 through September 18, 2018; November 22, 2018 through November 26, 2018; January 10, 2019 through January 15, 2019; and June 25, 28, and 30, 2019 disclosed:
 - (1) SAI did not document that it conducted 34 (9.3%) of the 364 required cell (bunk) searches.
 - (2) SAI did not document that it completed 135 (7.2%) of the 1,885 required trainee shakedowns on the daily trainee shakedown reports or in the logbook.
 - (3) SAI did not search 28 (12.6%) of the 222 cells (bunks), 9 (4.1%) of the 220 cells (bunks), and 17 (7.6%) of the 224 cells (bunks) at least once during September 2018, January 2019, and June 2019, respectively.
- b. Our review of surveillance video for 26 cell searches that were documented in the housing unit logbooks from June 28, 2019 through July 2, 2019; July 6, 2019 through July 10, 2019; and July 12, 2019 through July 18, 2019 disclosed that surveillance video:
 - (1) Did not corroborate 16 (61.5%) cell searches.
 - (2) Depicted officers entering and exiting 6 (23.1%) cells within 6 seconds to 84 seconds, raising concerns regarding the thoroughness of the searches or whether the searches actually occurred. For privacy purposes, the surveillance

Surveillance video did not support documented cell searches.

video does not capture activity within trainees' cells.

SAI did not have a mechanism in place to monitor whether cell searches and trainee shakedowns were completed.

We consider this finding to be a material condition because of the significance of the combined exception rates, the potential falsification of documented cell searches, and the impact that contraband could have on the safe operation of SAI.

RECOMMENDATION

We recommend that SAI conduct and document all required cell searches and trainee shakedowns.

**AGENCY
PRELIMINARY
RESPONSE**

MDOC provided us with the following response:

Agrees.

MDOC agrees that SAI did not always document prisoner cell, and area shakedowns.

Plan of Action: SAI has developed a more user-friendly shakedown log that outlines cell, personal and area searches to be completed. The format allows for clearer and more comprehensive documentation of searches conducted. Additionally, Post Orders are being reviewed and updated as needed.

A Sergeant will be assigned to complete a weekly audit of search requirements to ensure compliance with the SAI operating procedure. The audit will include periodic review of cameras to verify documented searches are corroborated on video. The Sergeant will report findings to the Deputy Warden weekly.

FINDING #3

Radio checks not completed.

SAI did not conduct all required radio checks. Periodic contact with corrections officers ensures that radio equipment is in working order and helps to ensure the safety and security of the officers.

MDOC policy directive 04.04.100 requires radio status checks to be conducted on an hourly basis during daylight hours and at least every half hour during darkness for single staff assignments. Also, SAI operating procedure 04.04.100i requires that the control center officer make a base station check with the Cooper Street Correctional Facility at the beginning of each shift to test the 800 MHz base station radio communication system.

Our review of SAI's documentation for the periods October 25, 2018 through October 29, 2018; December 1, 2018 through December 5, 2018; April 11, 2019 through April 15, 2019; and July 11, 2019 through July 15, 2019 noted that SAI did not conduct:

- 8 (13.3%) of the 60 required base station radio checks.
- 184 (27.1%) of the 680 required individual radio checks in a timely manner, including 81 (11.9%) that ranged from 6 minutes to 42 minutes late.

SAI stated that staff were not following procedure. It also indicated that this is a performance issue and that staff need to be retrained on the radio procedures and offered better tools to help record the required checks.

RECOMMENDATION

We recommend that SAI conduct and document all required radio checks.

AGENCY PRELIMINARY RESPONSE

MDOC provided us with the following response:

Agrees.

With the relocation of SAI inside JCS, JCS Control Center Shift Command is now responsible to complete radio checks in accordance with policy.

Plan of Action: The JCS Bubble Officer completes the radio checks for both JCS and SAI. SAI OP 04.04.100i has been retired. The radio checks are in compliance with PD 04.04.100; once per shift and hourly on single staff assignments.

FINDING #4

Improvements needed over completion of gate manifests.

SAI did not properly complete all gate manifests. As a result, an increased risk exists that critical and dangerous items could be left inside the prison, thus endangering staff and trainees.

Gate manifests serve as a tracking mechanism for items (tools, supplies, medications, etc.) entering and leaving the prison and are used to control and prevent the introduction of contraband and the theft of State property.

SAI operating procedure 04.04.100e requires that staff ensure the proper completion of the gate manifests, including the entry and exit times, and that all appropriate signatures and boxes are checked. The operating procedure also requires the front desk officer to match the front desk copy with the carrier's returned copies, ensure that all of the appropriate sections were completed, and reconcile the returned copies with the gate manifest log.

Our review of the 99 gate manifests prepared from May 20, 2018 through May 26, 2018; August 5 through August 11, 2018; December 30, 2018 through January 5, 2019; and March 10, 2019 through March 16, 2019 noted:

- a. For 33 (33.3%) gate manifests, SAI recorded identical entry and exit times.
- b. For 7 (7.1%) gate manifests, SAI did not record the entry time, exit time, or both.
- c. For 16 (16.2%) gate manifests, SAI recorded a different entry or exit time on the manifest log than was on the manifest.
- d. For 4 (4.0%) gate manifests, the gate officer's signature was missing.

SAI indicated that the gate officer's position was a rotatable position and all gate officers may not have been aware of the proper procedure to handle gate manifest forms and that the manifests were not always returned to the front desk.

RECOMMENDATION

We recommend that SAI implement the necessary controls to ensure that all gate manifests are properly completed and approved.

AGENCY PRELIMINARY RESPONSE

MDOC provided us with the following response:

Agrees.

MDOC agrees that SAI did not always complete the Gate Manifest form completely leaving room for improvement.

Plan of Action: At JCS, gate manifests are completed by the Sallyport and Front Gate Officer who ensure they are completed accurately. The mid-shift Bubble Officer reviews all manifests daily and forwards to the Arsenal Sergeant for review. The Arsenal Sergeant then forwards to the Inspector for reconciliation monthly. The Inspector refers them back for corrections/training when needed.

FINDING #5

Improvements needed over required training.

SAI did not ensure that all trainees received safety and tool training prior to working on assignment and did not maintain training documentation. SAI compromised trainees' safety and increased the State's risk of potential litigation.

MDOC policy directive 04.03.101 requires offenders to complete training and orientation prior to working on assignment and requires training documentation to be retained for the duration of the offender's sentence, plus three years.

We requested training documentation (CAJ-900s) for 25 of the 160 trainees identified on the July 1, 2018 work roster and 43 of the 260 trainees identified on the May 1, 2019, June 1, 2019, and July 1, 2019 work rosters. Our review noted:

- None of the 25 trainees' files selected from the July 1, 2018 work roster had any training documentation. SAI indicated that it only retained documentation until the trainees graduated.
- 5 (11.6%) of the 43 trainees' files did not contain evidence that training was provided.
- 6 (14.0%) of the 43 trainees' files indicated that the trainee had received training 7 to 45 days after being placed on the work roster.

Also, as noted in Finding #6 d., 6 (42.9%) of 14 trainees who were assigned to either gate pass or public works assignments had not received the required training.

SAI had not developed control processes to ensure that trainees receive training prior to being placed on the work roster. The maintenance supervisor did not track trainees' training status and the programming director assumed training was completed within a few weeks of being admitted to SAI.

RECOMMENDATION

We recommend that SAI develop processes to track the training status of each trainee and verify the completion of appropriate training prior to being assigned to a work assignment.

AGENCY PRELIMINARY RESPONSE

MDOC provided us with the following response:

Agrees.

With the relocation of SAI inside JCS, SAI processes have been revised to align with JCS.

Plan of Action: During orientation, each trainee will be presented with the CAJ-900 Prisoner Worker Safety Training Record. The Corrections Program Coordinator (CPC) will report monthly to the Deputy Warden that new admissions are tracked for completion prior to assignment to work. Post Orders have been updated to reflect the process.

FINDING #6

Compliance with gate pass and public works assignment procedures need improvement.

SAI should improve its compliance with security procedures related to trainee gate pass and public works assignments to reduce the opportunity for escape and help to ensure the safety of staff, trainees, and the public.

Gate 1 is the main entrance gate to the Facility and allows access from the public road to the unsecure areas, such as the administration building and parking lots. Gate 2 is the entrance to the Facility's secure perimeter.

Our review noted that SAI:

- a. Did not close the outer security gate (gate 1) when trainees were working on Facility grounds outside of the inner secure perimeter (gate 2).

SAI operating procedure 03.02.121 states that a trainee can work outside of gate 2 but inside of gate 1 only if gate 1 remains closed.

While we were on site at the Facility from July 1, 2019 through October 17, 2019, primarily between 7:00 a.m. through 5:00 p.m. on Monday through Friday, we observed on a daily basis that SAI allowed trainees to be outside of gate 2 while gate 1 was open, noting that gate 1 was closed on only 2 occasions for approximately 5 minutes each time.

It appeared to us that SAI considered the trainees as low risk of escape and, therefore, did not enforce the requirement.

- b. Inappropriately assigned trainees to work in its administration building outside of the secure perimeter (gate 2).

SAI operating procedure 03.02.121 requires trainees to have been enrolled in SAI at least 69 days with satisfactory adjustment before being assigned cleaning duties in the administration building.

Our review of SAI's work rosters noted that 5 (83.3%) of the 6 trainees who were assigned to work as administrative building porters in April, May, June, July, or August 2019 had only been enrolled in SAI for 39 to 55 days prior to beginning their work assignment.

The SAI programming director misapplied the requirement within the operating policy when assigning trainees to work as porters in the administration building.

- c. Did not inspect the public works transportation vehicles prior to leaving the Facility.

SAI operating procedure 03.02.121 requires the public works or off-grounds gate pass crew supervisor to inspect vehicles for items such as contraband, safety equipment, functioning brakes, and radio equipment and complete a daily vehicle inspection report.

SAI's public works sergeant indicated that he was not aware of the vehicle inspection requirement or the daily vehicle inspection report requirement and, therefore, had never completed them.

- d. Did not ensure that all trainees assigned to gate pass or public works received safety and tool training prior to their work assignment.

SAI operating procedure 03.02.121 requires that the public works or gate pass crew supervisors ensure that all trainees under their supervision are trained.

We noted that 6 (42.9%) of 14 trainees who were assigned to either gate pass or public works had not received the required training.

SAI had not developed control processes to ensure that trainees receive training prior to being placed on the work roster. The maintenance supervisor did not track trainees' training status and the programming director assumed that training was completed within a few weeks of arrival.

RECOMMENDATION

We recommend that SAI implement controls to ensure compliance with security procedures related to gate pass and public works assignments.

AGENCY PRELIMINARY RESPONSE

MDOC provided us with the following response:

Agrees.

With the relocation of SAI, the Public Works contract and program has been discontinued. However, MDOC agrees that SAI needs to do a comprehensive review of OP 03.02.121 to update processes allowing for the use of gate pass assignments.

Plan of Action: *SAI OP has been updated to reflect the removal of the Public Works program and the continued use of gate pass assignments within the structure of JCS.*

COMPLIANCE WITH FOOD SERVICE POLICIES AND PROCEDURES

AUDIT OBJECTIVE

To assess SAI's compliance with policies and procedures related to food service.

CONCLUSION

Complied.

**FACTORS
IMPACTING
CONCLUSION**

- SAI used MDOC's Statewide standard menu (SWSM) that met or exceeded the daily Dietary Reference Intake* recommendations for the 15 key nutritional values for the 3 days that we reviewed.
- SAI's food service was in compliance with its policies and procedures related to the menu plan and dispensing accurate portions and in compliance with sanitary and health code regulations at the time of our 3 unannounced visits to the Facility's food service building.

* See glossary at end of report for definition.

EVALUATING SAI BENEFITS

BACKGROUND

SAI is a 90-day elective program that can reduce an offender's sentence by up to 33 months. SAI is intended to provide targeted programming and training to address trainees' assessed risks and needs in a structured environment.

MDOC reports SAI-related data in its annual departmentwide and SAI legislative reports, including statistics for 3-year recidivism* rates for prisoners and probationers and other relevant data.

AUDIT OBJECTIVE

To assess the sufficiency of MDOC's efforts to evaluate the benefits of SAI.

CONCLUSION

Sufficient, with exceptions.

FACTORS IMPACTING CONCLUSION

- MDOC accurately reported the outcome data in the 2018 SAI annual report.
- MDOC accurately reported SAI data in MDOC's 2017 and 2018 statistical reports.
- Reportable condition related to MDOC's evaluation of the benefits of SAI (Finding #7).

* See glossary at end of report for definition.

FINDING #7

MDOC should improve its evaluation of SAI.

MDOC had not developed a comprehensive process to assist in evaluating the overall effectiveness of SAI and support its continuation.

Program effectiveness can often be evaluated and improved by having a comprehensive evaluation process. Such a process should include performance indicators* that measure outcomes* related to the program's goals* and objectives*; performance standards* or goals that describe the desired level of outcomes based on management expectations, peer group performance, and/or historical performance; a management information system to accurately gather relevant outcome data on a timely basis; a comparison of the actual data to desired outcomes; a reporting of the comparison results to management; and recommendations to improve effectiveness and efficiency* or change the desired performance standards or goals.

SAI's objectives are to develop the offender's self-esteem and self-discipline, sense of individual responsibility, and positive work ethic.

SAI annually compiles and reports certain information to the Legislature on the operation of SAI, including statistics relating to graduate recidivism and graduate success on the GED test. However, SAI and MDOC have not compared these statistics with similar statistics of former prisoners and probationers who did not complete SAI since May 2011, at which time the report stated that further analysis would be required to determine the longer term effects of the revised SAI curriculum. In addition, SAI and MDOC have not compiled or evaluated other performance indicators. For example, absconder* status*, reported wages, collection of unemployment compensation, receipt of public assistance, cost data, and stakeholder survey information could provide information that may be useful in evaluating the benefits of SAI.

By analyzing additional performance indicators and comparing performance indicator results of trainees and probationers who completed SAI with former prisoners and probationers who were eligible for but did not complete SAI, MDOC could begin to evaluate the overall effectiveness of SAI, including whether the graduates benefited from SAI and whether SAI met its objectives.

Our review of performance indicator and cost data indicated that SAI offers a cost savings to the State; however, our analysis of SAI performance outcome measures predominantly indicated higher return to custody or supervision rates and higher abscond rates:

- a. We compiled custody, supervision, absconder, and public assistance data for SAI prisoner graduates*, SAI-eligible prisoners*, SAI probationer graduates*, and SAI-eligible probationers*, as applicable, from October 1, 2006 through

* See glossary at end of report for definition.

September 30, 2019. Our results are presented as supplemental information in Exhibits #1 through #4. We acknowledge that many factors can impact the rate at which offenders re-offend, abscond, or need public assistance. However, this type of data, in addition to other relevant performance indicator data, should be collected and further analyzed to evaluate how well graduates function after completing SAI. Such analyses could provide valuable information to MDOC and others charged with determining the strategic direction of SAI.

- b. We performed a cost analysis of SAI and determined that it appears to be a cost-effective alternative for housing and rehabilitating offenders who meet the SAI eligibility criteria. SAI's average daily per trainee cost for fiscal year 2018 of \$176.97 exceeds the average daily prisoner cost of the State's five other minimum security (level I) correctional facilities of \$85.36. However, considering that SAI trainees are generally incarcerated for only 90 days compared with an average incarceration period of 24 months for SAI-eligible prisoners and the additional costs of reincarcerating 37.1% of the SAI prisoner graduates who returned to prison, MDOC realizes a cost savings of approximately \$9.3 million for every 400 SAI prisoner graduates.

RECOMMENDATION

We recommend that MDOC develop a comprehensive process to sufficiently assess the benefits of SAI.

**AGENCY
PRELIMINARY
RESPONSE**

MDOC provided us with the following response:

Agrees.

MDOC agrees that assessing and evaluating the effectiveness of programs, including SAI, has merit.

Plan of Action: MDOC will perform a comprehensive review of the SAI reporting, including the annual report and the reporting in the yearly Statistical report, in order to determine appropriate effectiveness measures for SAI. At the very minimum, the resulting revised reporting will include an expansion of MDOC's current 3-year recidivism measure to SAI.

SUPPLEMENTAL INFORMATION

UNAUDITED
Exhibit #1

SPECIAL ALTERNATIVE INCARCERATION PROGRAM (SAI) FOR MEN Michigan Department of Corrections

Summary of Data for Selected Performance Indicators As of September 30, 2019

	Fiscal Year of Graduation, Release, or Parole ¹												
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
<u>Returned to MDOC Custody or Supervision</u>													
SAI prisoner graduates - Custody ²	45%	49%	46%	47%	45%	47%	38%	34%	32%	28%	25%	14%	3%
SAI-eligible prisoners - Custody ²	43%	44%	40%	39%	38%	35%	32%	24%	26%	20%	16%	9%	4%
SAI prisoner graduates - Supervision ³	17%	15%	14%	12%	12%	9%	13%	14%	15%	8%	6%	4%	1%
SAI-eligible prisoners - Supervision ³	13%	13%	12%	13%	13%	13%	13%	13%	11%	10%	7%	3%	1%
SAI probationer graduates ⁴	71%	64%	67%	62%	66%	62%	59%	53%	53%	48%	43%	31%	11%
SAI-eligible probationers ⁴	27%	25%	24%	22%	22%	21%	19%	17%	15%	12%	9%	6%	2%
<u>Absconder⁵</u>													
SAI prisoner graduates	21%	29%	27%	26%	26%	28%	26%	27%	27%	26%	29%	25%	10%
SAI-eligible prisoners	22%	26%	22%	22%	19%	24%	20%	19%	21%	21%	25%	23%	10%
SAI probationer graduates	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶
SAI-eligible probationers	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶	N/A ⁶
<u>Food and/or Cash Assistance⁷</u>													
SAI prisoner graduates	77%	80%	79%	79%	79%	71%	73%	67%	69%	60%	58%	56%	38%
SAI-eligible prisoners	80%	82%	82%	85%	81%	77%	74%	71%	71%	68%	62%	59%	48%
SAI probationer graduates	71%	66%	69%	67%	68%	58%	65%	58%	56%	44%	42%	31%	21%
SAI-eligible probationers	57%	57%	57%	56%	56%	55%	51%	48%	45%	43%	38%	32%	25%

¹ Evaluated as of September 30, 2019.

² Percentage of SAI prisoner graduates or SAI-eligible prisoners who returned to State custody at any time after graduation, release, or parole through September 30, 2019.

³ Percentage of SAI prisoner graduates or SAI-eligible prisoners who were under State supervision at any time after graduation, release, or parole through September 30, 2019.

⁴ Percentage of SAI probationer graduates or SAI-eligible probationers who returned to State supervision or entered State custody at any time after graduation or release through September 30, 2019.

⁵ Percentage of SAI prisoner graduates or SAI-eligible prisoners who absconded from their first parole after graduation or release at any time through September 30, 2019. Individuals who absconded and returned to State custody are included in the absconder percentage and the returned to State custody percentage.

⁶ Absconder data was not analyzed for probationers.

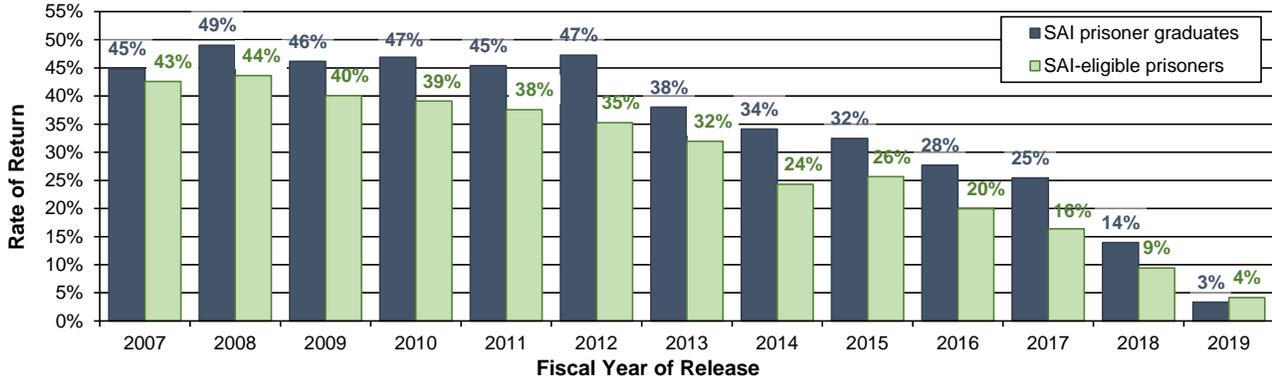
⁷ Percentage of SAI prisoner graduates, SAI-eligible prisoners, SAI probationer graduates, or SAI-eligible probationers who received food and/or cash assistance through the Michigan Department of Health and Human Services (MDHHS) after graduation, release, or parole through September 30, 2019.

This data is displayed in chart format in Exhibits #2 through #4.

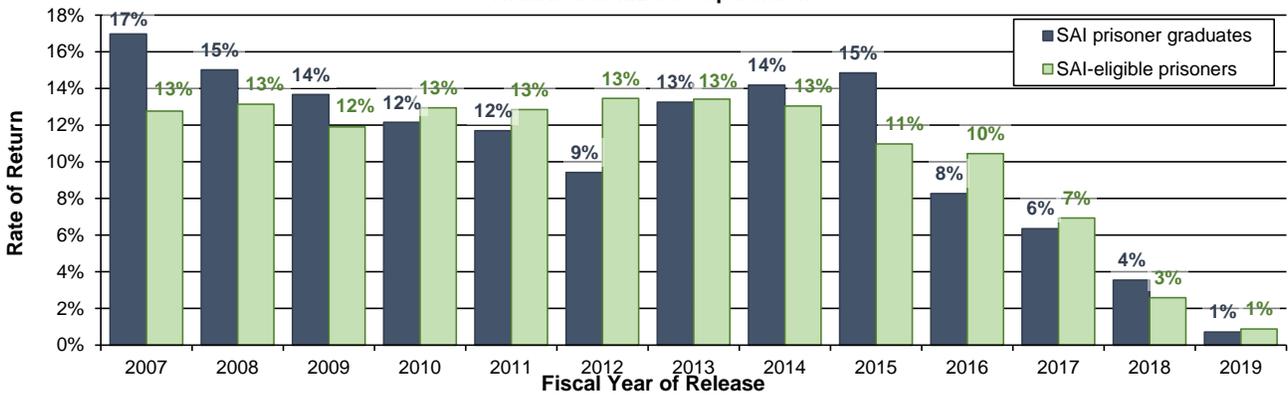
SPECIAL ALTERNATIVE INCARCERATION PROGRAM (SAI) FOR MEN
Michigan Department of Corrections

Returned to MDOC Custody or Supervision Data
As of September 30, 2019

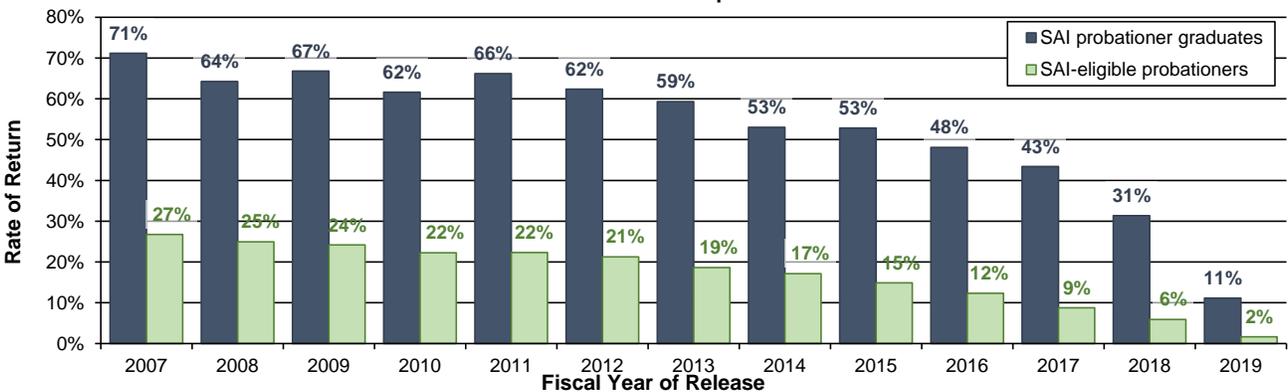
Returned to MDOC Custody



Returned to MDOC Supervision



Returned to MDOC Supervision

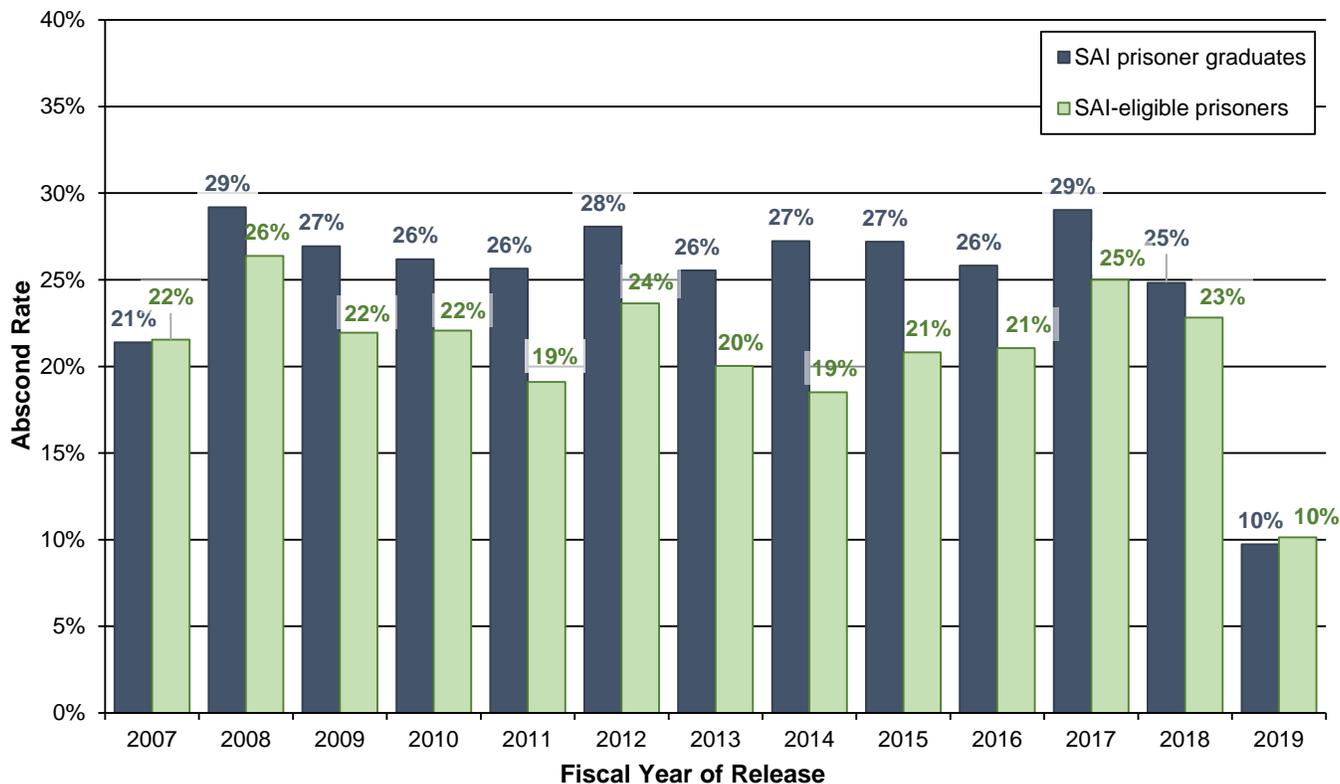


These charts represent the percentage of SAI prisoner graduates, SAI-eligible prisoners, SAI-probationer graduates, and SAI-eligible probationers who returned to MDOC custody or supervision after graduation or release, by fiscal year of graduation or release, as of September 30, 2019.

Source: The OAG prepared this exhibit using data from the Offender Management Network Information System (OMNI).

SPECIAL ALTERNATIVE INCARCERATION PROGRAM (SAI) FOR MEN
Michigan Department of Corrections

Absconder Data
As of September 30, 2019



This chart represents the percentage of SAI prisoner graduates and SAI-eligible prisoners who absconded from their first parole after graduation or release at any time through September 30, 2019.

Source: The OAG prepared this exhibit using data from OMNI.

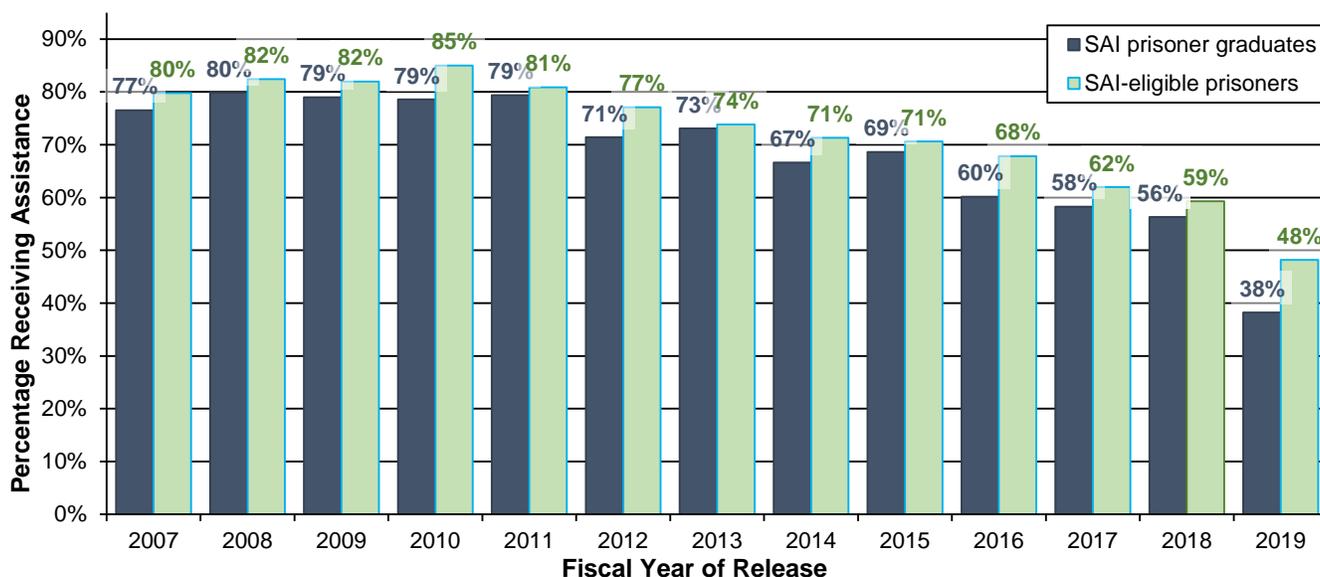
SPECIAL ALTERNATIVE INCARCERATION PROGRAM (SAI) FOR MEN

Michigan Department of Corrections

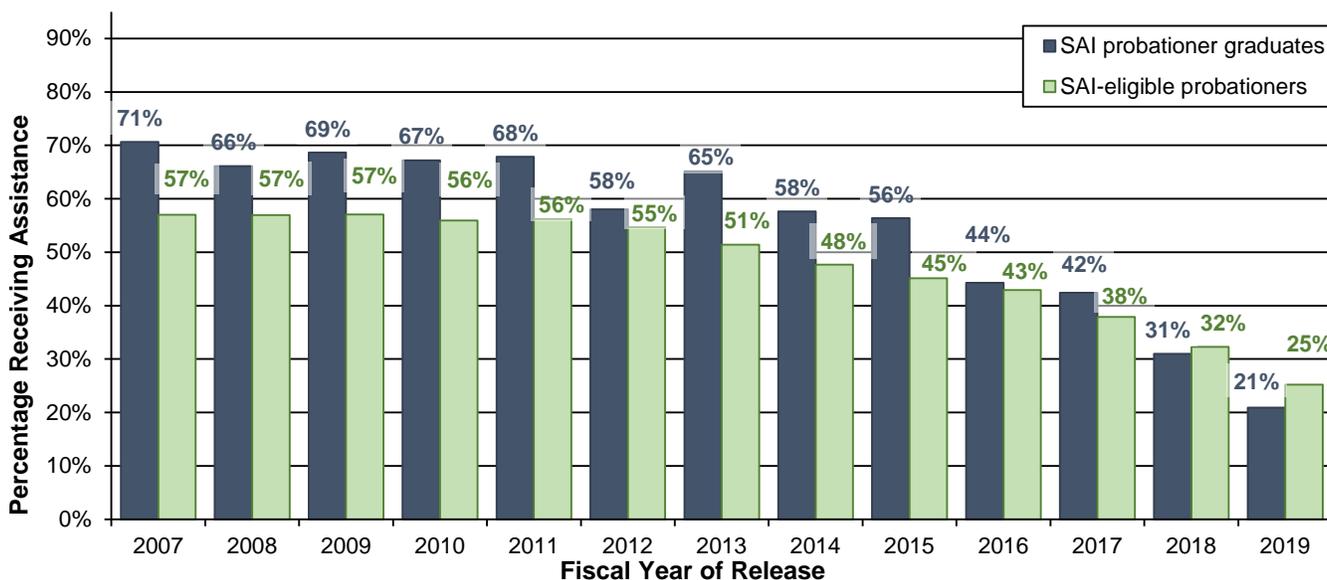
Food and/or Cash Assistance Data

As of September 30, 2019

Prisoners



Probationers



These charts represent the percentage of SAI prisoner graduates, SAI-eligible prisoners, SAI probationer graduates, and SAI-eligible probationers who received food and/or cash assistance through MDHHS after graduation, release, or parole through September 30, 2019.

Source: The OAG prepared this exhibit using data from OMNI and MDHHS's Bridges Integrated Automated Eligibility Determination System* (Bridges).

*See glossary at end of report for definition.

PROGRAM DESCRIPTION

SAI was created by Public Act 287 of 1988 (Sections 798.11 - 798.18 of the *Michigan Compiled Laws*) as an alternative prison program for selected male probationers who were convicted of certain crimes. Public Act 22 of 1992 amended the eligibility criteria to include both male and female prisoners and probationers.

SAI focuses on each individual's assessed risks and needs and provides targeted programming and training. The evidence-based programs provided during the offender's SAI experience include Cognitive Behavioral Restructuring, Family/Community Structure, Education, Daily Living Skills, and Self-Discipline. SAI trainees are not afforded the same privileges as offenders housed in other State correctional facilities. For example, SAI trainees are allowed to have very limited personal property and are not allowed to have visitors (except clergy or attorneys) or to receive funds from any source.

MDOC and SAI operate under the offender success model* in which the mission is to reduce crime by implementing a seamless plan of services and supervision developed for prisoners, delivered through State and local collaboration, from the time of their entry into prison through their transition, reintegration, and aftercare in the community.

Through March 6, 2020, SAI was located three miles north of Chelsea, Michigan, at the Special Alternative Incarceration Facility. It is under the jurisdiction of MDOC and is supervised by the warden of the Cooper Street Correctional Facility. Subsequently, MDOC transferred the SAI operations to the Cooper Street Correctional Facility.

For fiscal year 2018, SAI graduated 817 trainees and incurred total expenditures of \$13.5 million, at an average cost of \$16,524 per trainee graduate.

* See glossary at end of report for definition.

AUDIT SCOPE, METHODOLOGY, AND OTHER INFORMATION

AUDIT SCOPE

To examine the program and other records and processes related to the operation of SAI. We conducted this performance audit* in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We did not include any aspect of SAI for female trainees within the scope of this audit. SAI for females is operated separately at the Women's Huron Valley Correctional Facility.

PERIOD

Our audit procedures, which included a preliminary survey, audit fieldwork, report preparation, analysis of agency responses, and quality assurance, generally covered October 1, 2017 through August 31, 2019.

METHODOLOGY

We conducted a preliminary survey to gain an understanding of SAI's processes and operations in order to establish our audit objectives, scope, and methodology. During our preliminary survey, we:

- Interviewed SAI management and staff regarding their functions and responsibilities.
- Examined SAI records and reviewed applicable laws, policies, and procedures.
- Observed various activities and operations.
- Reviewed SAI's annual reports, self-audits*, and monthly reports to the Warden including critical incident information sections.

OBJECTIVE #1

To assess the effectiveness of SAI's eligibility screening, intake, and discharge processes.

To accomplish this objective, we:

- Reviewed files for 50 of the 110 SAI trainees who graduated from June 25, 2019 through September 3, 2019 to determine whether the trainees completed the general and individualized programming required for graduation and were enrolled in GED classes, if

* See glossary at end of report for definition.

applicable. We randomly selected our sample to eliminate bias and enable us to project the results to this population.

- Reviewed OMNI records for 20 of the 173 trainees who were in SAI as of August 14, 2019 to determine whether the trainees met eligibility requirements. We randomly and judgmentally selected our sample to reduce bias and increase audit efficiency. Therefore, we could not project the results to the overall population.
- Reviewed the 2 SAI GED teachers' certifications for the entire audit period.
- Compared SAI's recruitment rosters for five days from August 1, 2019 through September 5, 2019 with the OMNI daily intake downloads to verify that the rosters were complete and accurate. We randomly selected our sample to eliminate bias and enable us to project the results to this population.
- Compared a listing of all MDOC prisoners who were incarcerated from October 1, 2017 through August 14, 2019 with SAI's database to determine whether the prisoners were screened for SAI eligibility.
- Reviewed SAI's process for screening all 445 future eligible offenders as of October 1, 2019 to determine whether SAI actively monitored their eligibility.

OBJECTIVE #2

To assess SAI's compliance with policies and procedures related to safety and security.

To accomplish this objective, we reviewed policies and procedures, examined records, and assessed SAI's compliance with policies and procedures related to safety and security at SAI, including:

- Gate access
- Cell searches and area searches
- Trainee shakedowns
- Radio checks
- Gate manifests
- Training
- Gate pass and public works
- Tool control

For the above areas, with the exception of tool control, our testing methodologies are reflected in the related findings (Findings #1 through #6).

For tool control, we conducted a physical inspection of 375 critical or dangerous tools in 4 of the 19 tool areas. We judgmentally selected the tool areas based on the number of

tools in the area and results of our preliminary walk-through and judgmentally selected the tools based on the danger level of the tool. We also tested the completion of weekly tool inspection reports related to 18 tool areas for 4 weeks (randomly selected 2 weeks from each fiscal year in our audit period).

We also conducted limited procedures related to other operational areas, including key control, prisoner counts, fire safety, and medication inventories.

We used random and judgmental sampling to reduce bias, project our results to the respective populations, and increase audit efficiency. Where a combination of random and judgmental sampling was used, we could not project the results to those populations.

OBJECTIVE #3

To assess SAI's compliance with policies and procedures related to food service.

To accomplish this objective, we:

- Reviewed the caloric and nutritional value of the SWSM used by SAI for the breakfast, lunch, and dinner meals for 3 days in one quarter of our audit period. We randomly selected the days to eliminate bias and enable us to project the results to this population.
- Observed the food service line and kitchen on 3 judgmentally selected days to determine whether SAI's food service operations complied with applicable policies and procedures. We could not project the results to the overall population.

OBJECTIVE #4

To assess the sufficiency of MDOC's efforts to evaluate the benefits of SAI.

To accomplish this objective, we:

- Performed analyses, using OMNI and MDHHS's Bridges data, comparing factors for SAI prisoners and probationers with performance of non-SAI prisoners and probationers. These factors included returning to MDOC custody or supervision, absconder status, and receiving public assistance.
- Verified the accuracy of selected outcome data included in the 2018 SAI annual report.
- Verified the accuracy of selected SAI data included in MDOC's 2017 and 2018 statistical reports.

CONCLUSIONS

We base our conclusions on our audit efforts and any resulting material conditions or reportable conditions.

When selecting activities or programs for audit, we direct our efforts based on risk and opportunities to improve State government operations. Consequently, we prepare our performance audit reports on an exception basis.

**AGENCY
RESPONSES**

Our audit report contains 7 findings and 7 corresponding recommendations. MDOC's preliminary response indicates that it agrees with all of the recommendations.

The agency preliminary response that follows each recommendation in our report was taken from the agency's written comments and oral discussion at the end of our fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and the State of Michigan Financial Management Guide (Part VII, Chapter 4, Section 100) require an audited agency to develop a plan to comply with the recommendations and to submit it to the State Budget Office upon completion of an audit. Within 30 days of receipt, the Office of Internal Audit Services, State Budget Office, is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

**SUPPLEMENTAL
INFORMATION**

Our audit report includes supplemental information presented as Exhibits #1 through #4. Our audit was not directed toward expressing a conclusion on this information.

GLOSSARY OF ABBREVIATIONS AND TERMS

absconder	A parolee who has clearly fled supervision and/or missed two consecutive scheduled in-person contacts.
absconder status	The classification assigned to a parolee who has absconded.
area search	The act of going through a housing unit's common areas looking for contraband.
Bridges Integrated Automated Eligibility Determination System (Bridges)	An automated, integrated service delivery system for Michigan's cash assistance, medical assistance, food assistance, child care assistance, and emergency assistance programs.
cell search	The act of going through a prisoner's cell and belongings looking for contraband.
contraband	Property that is not allowed on facility grounds or in visiting rooms by State law, rule, or MDOC policy. For prisoners, this includes any property that they are not specifically authorized to possess, authorized property in excessive amounts, or authorized property that has been altered without permission.
Dietary Reference Intake	The general term for a set of reference values, which vary by age and gender, used to plan and assess nutrient intakes of healthy people issued by the Food and Nutrition Board of the National Academies of Sciences, Engineering, and Medicine.
effectiveness	Success in achieving mission and goals.
efficiency	Achieving the most outputs and the most outcomes practical with the minimum amount of resources.
gate manifest	A record used to control materials and supplies entering and leaving a facility through the front gates and sallyport.
gate pass assignment	Assignment of a supervised prisoner to a work duty on MDOC grounds but outside the secure perimeter of the facility.
GED	General Educational Development.
goal	An intended outcome of a program or an entity to accomplish its mission.

intake	The process of receiving offenders from referral sources and placing them in SAI.
JCS	Cooper Street Correctional Facility.
material condition	A matter that, in the auditor's judgment, is more severe than a reportable condition and could impair the ability of management to operate a program in an effective and efficient manner and/or could adversely affect the judgment of an interested person concerning the effectiveness and efficiency of the program. Our assessment of materiality is in relation to the respective audit objective.
MDHHS	Michigan Department of Health and Human Services.
MDOC	Michigan Department of Corrections.
minimum security (level I)	The classification assigned to prisons that house prisoners who can live in facilities with a minimal amount of security. These prisoners are normally relatively near parole, are not serving for a sexual offense, and have no history of certain kinds of arson behavior.
objectives	Specific outcomes that a program seeks to achieve its goals.
offender success model	A model in which the mission is to reduce crime by implementing a seamless plan of services and supervision developed for prisoners, delivered through State and local collaboration, from the time of their entry into prison through their transition, reintegration, and aftercare in the community.
OMNI	Offender Management Network Information System.
outcomes	The actual impacts of the program.
performance audit	An audit that provides findings or conclusions based on an evaluation of sufficient, appropriate evidence against criteria. Performance audits provide objective analysis to assist management and those charged with governance and oversight in using the information to improve program performance and operations, reduce costs, facilitate decision-making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.
performance indicator	Information of a quantitative or qualitative nature used to assess achievement of goals and/or objectives.

performance standard	A desired level of output or outcome.
prisoner	Person serving a term of incarceration under the jurisdiction of MDOC.
probationer	Person placed on probation pursuant to Chapter XI of the Code of Criminal Procedure, Public Act 175 of 1927, being Section 771.3b of the <i>Michigan Compiled Laws</i> .
public works	Projects in the local community where trainees work, such as maintaining public residential areas and working in a recycling facility.
recidivism	The return of a prisoner or parolee to State custody. MDOC measures recidivism as the 3-year period after release or parole.
reportable condition	A matter that, in the auditor's judgment, is less severe than a material condition and falls within any of the following categories: an opportunity for improvement within the context of the audit objectives; a deficiency in internal control that is significant within the context of the audit objectives; all instances of fraud; illegal acts unless they are inconsequential within the context of the audit objectives; significant violations of provisions of contracts or grant agreements; and significant abuse that has occurred or is likely to have occurred.
SAI	Special Alternative Incarceration Program.
SAI-eligible prisoners and SAI-eligible probationers	Former prisoners and probationers who did not participate in SAI even though their crime and sentence met the requirements to be eligible for SAI.
SAI prisoner graduates and SAI probationer graduates	Former prisoners and probationers who graduated from SAI.
self-audits	Audits performed by facility staff that enable management and staff to ensure that all operational units comply with policy directives and take proactive steps to correct any noncompliance. Performing self-audits is intended to maximize safe and efficient operations by MDOC.
shakedown	The act of searching a trainee, an employee, or a visitor to ensure that he/she does not have any contraband in his/her possession.

SWSM Statewide standard menu.

trainee An offender and participant in SAI (either a prisoner or a probationer).



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