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SAFETY, RESPECT
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FOR ALL

LA SÉCURITÉ,
LA DIGNITÉ
ET LE RESPECT
POUR TOUS

Audit of Community Supervision

Internal Audit

378-1-258

September 28, 2010



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EXECUTIVE SUMMARY

BACKGROUND

The Audit of Community Supervision is being conducted as part of Correctional Service Canada's (CSC) Internal Audit Branch 2009-2012 Audit Plan and it is linked to the CSC priority of "safe transition of eligible offenders into the community." As noted in the 2010-2011 Report on Plans and Priorities, the vast majority of offenders will eventually return to the community either through some form of conditional release or because their sentence will have expired. Ensuring those offenders are effectively and efficiently supervised in the community is essential to public safety.

In fiscal year 2010-2011, CSC expects to spend \$141 million on community supervision. At any given time, CSC supervises approximately 8,000 offenders within the community through 84 parole offices. These offices report to 32 area offices under eight district offices. In addition, CSC manages 16 Community Correctional Centres and has approximately 200 contracts in place with community-based agencies to manage Community Residential Facilities¹.

In February 2008, CSC launched a Transformation Agenda² with the goal of enhancing the public safety of Canadians. The Transformation Agenda comprises a number of inter-related initiatives in five main themes, one of which is strengthening community corrections. Some of the key initiatives implemented include a strengthened policy on tandem supervision visits and the launching of a pilot program to enhance community staff safety.

As part of the risk-based audit planning process, an audit on Community Supervision was identified for fiscal year 2009-2010 and the objectives were to:

- Provide reasonable assurance that the management framework in place supports the effective supervision of offenders in the community.
- Provide reasonable assurance that CSC is complying with relevant legislation and policy directives with regards to the supervision of offenders in the community.

CONCLUSION

The key elements of a management framework are in place to support the supervision of offenders in the community. Commissioner's Directives (CD) related to community supervision are consistent with legislation and are generally well understood by employees. Roles and responsibilities are understood and parole officers are generally being provided with sufficient job relevant training. We also found that resources for

¹ http://infonet/opr/community/home_e.shtml

² Integrated Overview CSC Transformation Agenda – November 2009



parole officer and parole officer supervisor positions are being allocated to the Districts in accordance with the workload formula prepared by National Headquarters. Finally, we found that regular monitoring and reporting was occurring in only two of the eight districts across CSC.

Our audit showed that attention is required in the following areas:

- There is a need for cross referencing between current CDs and relevant case management and security bulletins to ensure that all requirements are being followed;
- There is a need for the districts to ensure that parole officers are compliant with their annual training requirements.; and
- There is a need for a standard approach for the monitoring and reporting of trends and data for offenders in the community.

In general, CSC is supervising offenders in the community in compliance with the various CDs regarding community supervision. The audit noted that documentation is typically being completed when required and within any applicable timelines. We also noted that case contact with offenders is typically occurring as required in the CDs. Furthermore, we found no compliance issues regarding the way suspensions are being exercised, both in terms of completing the required documentation and ensuring the safety of Parole Office staff.

Nevertheless, our audit showed that attention is required in the following areas:

- There is a need to ensure that documentation is completed and reviewed as specified in the CDs;
- There is a need for a review of the CDs surrounding tandem supervision, including the criteria for tandem supervision; and
- There is a need to ensure that the requirements for urinalysis testing, including completion of the applicable forms and the selection of offenders, is occurring in accordance with policy.

Recommendations have been made in the report to address these areas for improvement. Management has reviewed and agrees with the findings contained in this report and a Management Action Plan has been developed to address the recommendations (see **Annex C**).



GLOSSARY

Community Correctional Centre: Community Correctional Centres are community-based residential facilities operated by CSC that provide a structured living environment with 24-hour supervision, programs, and interventions to assist the offender with a gradual and structured transition to the community.

Community Residential Facility: Community Residential Facilities are operated by non-governmental organizations or private aftercare agencies that provide a structured living environment with 24-hour supervision, programs and interventions to assist the offender with a gradual and structured transition to the community.

Corrections and Conditional Release Act and Regulations (CCRA/CCRR): A prescriptive legislative framework proclaimed in 1992 which guides NPB policies, training, operations and parole decision-making. It provides the legal framework for the correctional and parole system in Canada.

Day Parole: A form of conditional release, granted to an offender by the NPB or a provincial parole board, which requires the offender to return to a penitentiary, a Community-Based Residential Facility (CBRF), which includes an authorized private home placement, or a provincial correctional facility each night, unless otherwise authorized in writing.

Full Parole: A form of conditional release, granted to an offender by the NPB or a provincial parole board which allows the offender to serve a portion of the sentence in the community under supervision.

Long Term Supervision Order (LTSO): An order imposed by the court whereby an offender who has received such an order is supervised in accordance with the CCRA. The LTSO commences when the offender has finished serving all sentences for offences for which he or she had been convicted.

Special Conditions: Conditions imposed by the NPB on an offender granted a conditional release or subject to a Long-Term Supervision Order (LTSO) that are linked to an offender's risk and reduces the likelihood the offender will commit an offence. Special conditions are extraordinary measures that require demonstrable evidence that they are necessary, reasonable and the least restrictive option consistent with the protection of society.

Statutory Release: Is normally a non-discretionary form of legislated release that the CSC and the NPB are obligated to proceed with unless there is sufficient evidence to support the detention of the offender. The offender remains subject to supervision until the expiration of his or her sentence.

Unescorted Temporary Absence (UTAs): UTAs can be authorized for an unlimited period for medical reasons, and up to a maximum of 60 days for specific personal



development programs. Typically, UTAs last two to three days per month to allow the offender to visit family. The Board, the Commissioner of CSC and Wardens have authority to grant UTAs in specified circumstances, usually based on the type of offence. (Eligibility is set at 1/6 or 6 months into the sentence, whichever is greater).

Warrant Expiry Date: The date the sentence imposed by the courts officially ends.



STATEMENT OF ASSURANCE

This audit engagement was conducted with an audit level of assurance.

In my professional judgment as Chief Audit Executive, sufficient and appropriate audit procedures have been conducted and evidence gathered to support the accuracy of the opinion provided and contained in this report. The findings and conclusions are based on a comparison of the conditions, as they existed at the time, against pre-established audit criteria that were shared with management. The findings are applicable only to the entity examined.

Date: _____

Sylvie Soucy, CIA
A/Chief Audit Executive

1.0 INTRODUCTION

1.1 Background

The Audit of Community Supervision is being conducted as part of Correctional Service Canada's (CSC) Internal Audit Branch 2009-2012 Audit Plan and it is linked to the CSC priority of "safe transition of eligible offenders into the community." As noted in the 2010-2011 Report on Plans and Priorities, the vast majority of offenders will eventually return to the community either through some form of conditional release or because their sentence will have expired. Ensuring those offenders are effectively and efficiently supervised in the community is essential to public safety.

CSC expects to spend \$141 million in fiscal year 2010-2011 community supervision. At any given time, CSC supervises approximately 8,000 offenders within the community through 84 parole offices. These offices report to 32 area offices under eight district offices. In addition, CSC manages 16 Community Correctional Centres and has approximately 200 contracts in place with community-based agencies to manage Community Residential Facilities³.

Following the 2007 CSC Independent Review Panel report titled "*A Roadmap to Strengthening Public Safety*," CSC launched a Transformation Agenda, with the goal of enhancing the public safety of Canadians⁴. The Transformation Agenda comprises a number of inter-related initiatives in five main themes, one of which is strengthening community corrections. Some of the key initiatives implemented include a strengthened policy on tandem supervision visits and the launching of a pilot program to enhance community staff safety. Ongoing initiatives for 2009-2010 include developing comprehensive internal and external communications strategies specific to community corrections, promulgating a policy on Managing Community Incidents and enhancing case management practices for statutory release. It is expected that the results of this audit will further assist CSC in its efforts to strengthen community corrections.

1.2 Reporting Structure

The Community Reintegration Branch, under the Correctional Operations and Programs Sector, is responsible for promoting and facilitating national policies, strategies, initiatives and procedures to support the safe reintegration of offenders in the community.⁵

At the community level, there are eight District Offices consisting of one District in the Atlantic and Pacific Regions and two in each of the Québec, Ontario and Prairie Regions. As demonstrated below, area directors, who are responsible for the Parole Offices within their territory, report to district directors who report to their respective

3 http://infonet/opr/community/home_e.shtml

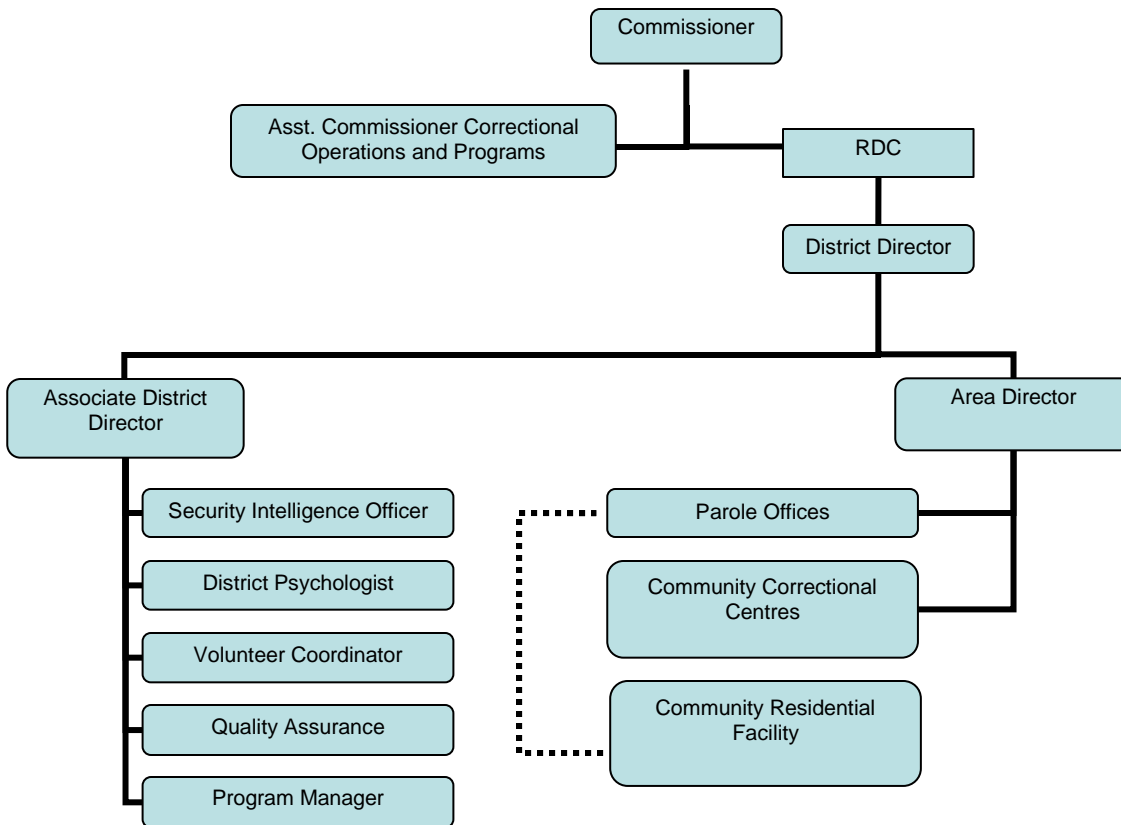
4 Integrated Overview CSC Transformation Agenda – November 2009

5 <http://infonet/Sectors/COPS/Community/cbranch.htm?lang=en>



Regional Deputy Commissioner. Within the actual parole offices, parole officer supervisors are responsible for the supervision of parole officers. Supervision includes assigning a caseload to the parole officers and conducting quality control reviews of reports completed by parole officers to ensure that they are completed in accordance with the various content guidelines and within the appropriate time frames.

Reporting Structure in the Community



Legend: Community Parole Offices are responsible for the supervision of offenders in Community Residential Facilities.

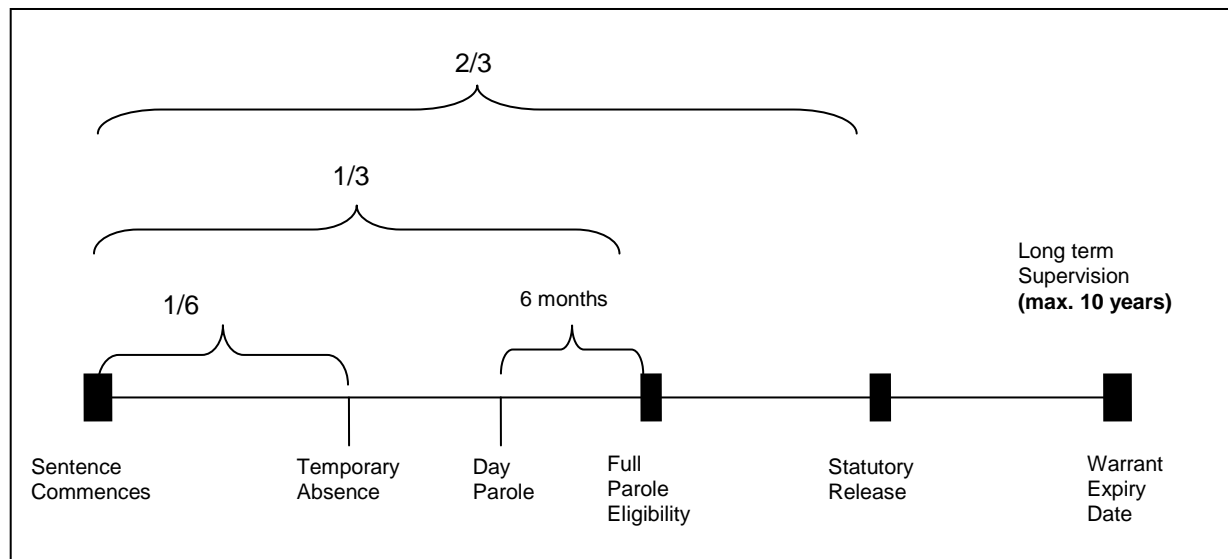
1.3 Types of Release

Most offenders will be considered for some form of release during their sentence and CSC is responsible for assessing the offenders' risk and making recommendations to the National Parole Board (NPB) on release options. The NPB is an independent administrative tribunal that has exclusive authority under the *Corrections and Conditional Release Act (CCRA)* to grant, deny, cancel, terminate or revoke day parole



and full parole⁶. If approved by the NPB, offenders are able to serve part of their sentence in the community under supervision and may remain on release in the community until their Warrant Expiry Date which is the official end of their sentence. There are four different types of release into the community: temporary absences/work releases, day parole, full parole and statutory release.

Sentence timeline ⁷(general rule)



Prior to an offender being granted day parole, full parole or statutory release, offenders must agree to any special conditions imposed by the NPB, such as abstaining from the use of alcohol. These conditions exist to assist the Parole Officer in the community to manage the risk of the released offender. CCRA Section 135 and Commissioner's Directive (CD) 715-3 (Post-Release Decision Process) allow CSC to suspend an offender's release in cases where there is either a breach of condition, to prevent a breach of condition or because it will protect society. When this occurs, CSC may recommend to the NPB that the offender's conditional release be revoked. Offenders on all types of conditional releases must report to a Parole Officer on a regular basis and must advise their Parole Officer of any significant changes in their release plan including a change of residency or change of employment.

1.4 Legislative and Policy Framework

The CCRA, more specifically sections 119 & 120 – *Eligibility for Parole*, and the *Corrections and Conditional Release Regulations (CCRR)* provide the legislative framework for the supervision of offenders in the community. These are the authorities from which CSC's community policy framework is established.

⁶ <http://www.npb-cnrc.gc.ca/about/abt-eng.shtml>

⁷ Does not include exceptions (e.g. Accelerated Day Parole, indeterminate sentences and lifers, Detained cases, judges can set a longer Parole Eligibility Dates, offenders can have new Statutory Release (SR) dates if they have conditional releases revoked, and others)



There are a number of Commissioner's Directives directly related to the supervision of offenders in the community. These include:

- CD 566-11: Urinalysis Testing in the Community
- CD 715: Community Supervision Framework
- CD 715-1: Community Transition and Post-Release Assessment
- CD 715-2: Community Supervision and Monitoring
- CD 715-3: Post-Release Decision Process
- CD 719: Long-term Supervision Order

1.5 Audit of Staff Safety in the Community

Following the 2004 murder of a Parole Officer from the Yellowknife Parole Office by an offender under community supervision, a Board of Investigation was convened and made 71 recommendations intended to reduce the risk to community staff. In the aftermath, CSC implemented a series of measures to increase the level of safety and to raise the level of awareness about staff safety issues related to community supervision practices.

In 2007, the Internal Audit Branch conducted an audit on staff safety in the community. The objectives of the audit were to:

- Assess the progress made by CSC specific to community operations in addressing the Board of Investigation's recommendations;
- Assess the progress made by operational sites to implement measures to strengthen staff safety in the community; and
- Determine if the assessment of staff safety is considered while managing the offender's risk in accordance with the community supervision policy requirements.

While the audit found that National Headquarters had made significant progress and had acted upon many of the recommendations, issues regarding compliance with procedures were found at the site level. These findings will be examined as a component of the current audit.

2.0 AUDIT OBJECTIVES AND SCOPE

2.1 Audit Objectives

The objectives of this audit were to:

- Provide reasonable assurance that the management framework in place supports the effective supervision of offenders in the community.
- Provide reasonable assurance that CSC is complying with relevant legislation and policy directives with regards to the supervision of offenders in the community.



Specific criteria related to each of the objectives of this audit are included in **Annex A**.

2.2 Audit Scope

The Audit of Community Supervision was national in scope and included site visits to 24 parole offices covering all Districts (see Annex B). The audit examined the processes related to the supervision of offenders once they are in the community. Interviews, observations and file reviews were conducted in order to assess the management framework and to assess compliance with policy regarding file documentation, contact with offenders, urinalysis program and suspension process. The sample of offender files reviewed included male, female and aboriginal offenders on all types of release. File review covered the period from April 1, 2009 to January 31, 2010.

Furthermore, the audit team reviewed the progress made in addressing the recommendations included in the May 2007 Audit of Staff Safety in the Community, which related to community supervision. Topics addressed included the completion of Staff Safety Assessments, tandem supervision requirements, and a formalized sign-in / sign-out procedure for Parole Officers conducting visits outside of the office.

The operation of Community Correctional Centres and the management of the contractual agreements with Community Residential Facilities were not examined as part of this audit.

Processes including the initial case conference between the institutional and community Parole Officers were also not examined as part of this audit, as they will be examined as a component of a future audit on release.

3.0 AUDIT APPROACH AND METHODOLOGY

In reviewing the management framework, the audit team reviewed legislation, Commissioner's Directives and procedures relating to community supervision along with the roles and responsibilities of the key individuals involved in the process. The audit team also examined if training was being provided to and taken by parole officers and determined if resources were being allocated to the community in accordance with the workload formula. Finally, we determined if the Districts were using any formal reporting processes to monitor the supervision of offenders in the community.

In assessing compliance with relevant legislation and Commissioner's Directives, the audit team examined the case contact between parole officers and the offenders, determined whether the key documents relating to community supervision were being completed and if these documents were being completed within the prescribed timelines. The overall urinalysis program and suspension process were also examined to determine compliance.

Various methods were used to gather evidence including:



- **Review of Documentation:** Relevant documentation, including legislation, Commissioner's Directives, and procedures relating to community supervision were reviewed and analyzed.
- **Site Visits:** Site visits were conducted at 24 Parole Offices. These offices included three sites per district and represented a mix of offices managing a large number of offenders and those supervising a smaller number of offenders. Furthermore, the sites selected included a mix of offices between those located in urban settings and those located in more rural settings.
- **Interviews:** 119 interviews were conducted with a sample of staff at the Parole Offices, Area Offices, District Offices and Regional Headquarters. The individual interviewees included parole officers, parole officer supervisors, area directors, district directors, urinalysis collectors, regional urinalysis coordinators and regional comptrollers.
- **File Reviews:** A random sample of offender files was reviewed for each test to determine compliance with the various legislation and CDs. The files reviewed include:
 - 47 parole officers training summaries from the Human Resource Management System (HRMS);
 - 230 offender files from the Offender Management System (OMS);
 - 289 physical case management files to determine existence of key case management documents; and
 - 190 physical case management files for urinalysis collections and results.
- **Analytical Review:** Analytical reviews were performed throughout the audit in order to identify trends, including best practices.

4.0 AUDIT FINDINGS AND RECOMMENDATIONS

4.1 Management Framework for Community Supervision

We assessed the extent to which an appropriate management framework is in place to support the effective supervision of offenders in the community. This included a review of legislation and CDs, training, roles and responsibilities, resource allocation and monitoring and reporting mechanisms.

4.1.1 Policy Framework

We expected to find that CDs and guidelines related to community supervision are sufficient to support the supervision of offenders in the community. We also expected to find that the CDs are consistent with both the *CCRA* and the *CCRR*.

Commissioner's Directives (CDs) are in line with both the Corrections and Conditional Release Act and the Corrections and Conditional Release Regulations.



We compared the relevant sections of the CCRA and the CCRR to the applicable Commissioner's Directives relating to Community Supervision. No discrepancies or contradictions were noted in our analysis.

Commissioner's Directives regarding community supervision are easy to understand and follow; however there is confusion regarding what the most current requirements are.

In 88% (61/69) of the interviews with parole officers and parole officer supervisors we were told that the CDs directly relating to community supervision were clear and easy to understand. In 70% (47/67) of these interviews we were also told that there are no areas of the CDs which could not be met. For those interviewees that did note concerns regarding the policy, they often stated that the specified timeframes for deliverables were, at times, unattainable. Parole officers said that when unexpected issues arise, such as having multiple offenders being suspended in a short period, timeframes may be missed on those responsibilities which they deem to be of lower importance such as the completion of casework records within seven calendar days.

During interviews, both parole officers and parole officer supervisors stated that when reviewing CDs, it is difficult to ensure that the most current or all requirements are being met. Bulletins, whether relating to case management or security, are regularly issued in order to clarify or augment the requirements of the policy. While these bulletins are shared with all employees and are maintained on the InfoNet, there is not one source where an employee can review a CD and note any applicable bulletins. As it currently exists, the CDs and any applicable policy bulletins are listed on one site while security bulletins exist on a separate site and case management bulletins on a third site. Furthermore, the Case Management and Security Bulletins are listed chronologically hence making it difficult to determine if any bulletins exist regarding a specific subject. It is common for parole officers to review the newest CD on the InfoNet without noting that a bulletin exists regarding that policy. This could lead to the possibility that some requirements may not be followed.

For example, a case management bulletin was issued in April 2008 requiring that casework records be completed within seven calendar days. However, in the most current policy it states that "...Parole Officers will maintain clear, detailed and up-to-date Casework Records"⁸ without specifying a specific timeframe. Not only does this lead to the possibility that the most current requirements may not be followed, it is also an inefficient use of time as the parole officer attempts to locate the specific bulletin.

Consultation typically exists between National Headquarters and the Districts with regards to changes in the Commissioner's Directives; however concerns were expressed regarding the consultation process followed.

During interviews with both area directors and parole officer supervisors, 74% (32/43) stated that they regularly receive requests for input and consultation on proposed policy

⁸ CD 715-2, para 42



changes. Concerns were raised by both area directors and parole officer supervisors that National Headquarters does not provide a sufficient amount of time to provide feedback. We heard that due to the limited time that the Parole Offices are given to provide feedback, which is typically between two and five days, and because of competing priorities for the time of parole officers, parole officer supervisors do not always forward them the request for comments. Only 38% (16/42) of parole officers interviewed had been requested in the past to provide comments on policy changes.

Concerns were also raised with the fact that consultation regarding policy changes typically occurs at the end of the process. Those interviewed stated that it would also be beneficial to consult on policy changes at the start of the process to allow sufficient time to get the suggestions of the staff that use them.

Commissioner's Directives are viewed as prescriptive in many areas but not enough in others.

During interviews with staff at the various levels, it was stated that the CDs are highly prescriptive. Parole officers stated that the prescriptive CDs minimize their room for professional judgment. Parole officers also stated that, in their opinion, the prescriptive nature is changing their job to be more about completing paperwork than it is about managing the risk of the offender. Area directors on the other hand feel that prescriptive CDs are necessary to ensure that all community parole officers supervise the offenders in a consistent manner.

The audit team also heard that while most CDs have become more prescriptive, some have been amended recently where it is thought that they are not specific enough. For example, at one time, policy stated that more than 50% of contacts with the offender were to take place in the community, which did not include meetings in public locations. However, the current policy provides no such direction. Parole officer supervisors told us that it is challenging to ensure that their parole officers are conducting a sufficient number of visits in the community as parole officers feel that it is their decision on how many community visits are required to best manage the risks of their offenders.

4.1.2 Roles and Responsibilities

We expected to find that roles and responsibilities related to the supervision of offenders in the community are clearly defined, understood and documented.

Parole officers and parole officer supervisors believe that they have a good understanding of their roles and responsibilities.

Through interviews we found that 95% (42/44) of parole officers and 91% (21/23) of parole officer supervisors believe that they understand their roles and responsibilities relating to the supervision of offenders in the community. Through our review of the various CDs on Community Supervision, we found that the CDs define many of the responsibilities of those supervising offenders in the community.



The actual duties in the job descriptions for parole officers and parole officer supervisors do not always reflect the actual roles.

During interviews with parole officers and parole officer supervisors, it was stated that the duties listed in the formal job descriptions do not always coincide with the actual duties performed. The current job description for parole officers is dated May 19, 1998 and the current one for parole officer supervisors is dated August 24, 2009. Of those who stated that they had reviewed a copy of their job description, 56% (19/34) of parole officers and 52% (11/21) of parole officer supervisors felt that their job descriptions are not in line with the duties they are actually performing in their jobs.

We heard, during the interviews, that individuals find the job descriptions to be vague as they are intended to cover the overall job of a community parole officer or parole officer supervisor at any office across the country. Many of the interviewees stated that some of the duties which are being completed by parole officers and parole officer supervisors are not specifically stated on the job description. For example duties regarding the coordination of urinalysis which is the responsibility of the parole officer supervisor, is not specifically listed as part of the job description.

Concerns were also raised by parole officers that some of the duties which are not expressly stated on the job description, take them away from supervising offenders and that these duties are not reflected in the workload formula. For example, we were told by parole officers that some spend time doing administrative duties, including filing and preparing new offender files, when there is no administrative assistant in the office. No credit is given to the workload of a parole officer for completing these other duties, and this could have an effect on the amount of time they have for supervising the offenders on their case loads.

4.1.3 Training

We expected to find that training is being provided to and taken by both parole officers and parole officer supervisors. We also expected to find that these individuals were compliant with the requirements of the National Training Standards (NTS).

Although each District is monitoring the training completed by parole officers, as per the National Training Standards, we found issues regarding compliance.

The National Training Standards represent the fundamental learning and development requirements employees must receive to be able to perform certain aspects of their roles and responsibilities. All training activities are compulsory and must be completed by the deadline indicated for each training activity.⁹

Each District has a training coordinator monitoring compliance with the National Training Standards. The training coordinators provide regular feedback to parole officer supervisors and area directors in order to ensure all parole officers are compliant with

⁹ National Training Standards, May 30, 2010 v2 P. I



the standards. As demonstrated in Figure 1.1, we noted compliance issues in some regions regarding the compliance with the training requirements.

In our review of the monitoring completed by National Headquarters, we were unable to confirm how overall compliance is being monitored. We were informed that there is currently no consistent approach in place to ensure that the data is being entered consistently across all Regions. The quality of the data being entered into the Human Resource Management System impacts the compliance reports prepared by National Headquarters.

We analyzed a sample of 47 parole officer training summaries from the Human Resource Management System to determine compliance with the National Training Standards in regard to the completion of Suicide Prevention and Parole Officer Continuous Development training requirements.

The course on Suicide Prevention gives parole officers the knowledge and skill proficiency to detect and respond to behaviours that may be indicative of suicidal or self-injurious intent. The initial suicide prevention training is received as a component of either the New Employee Orientation Program or the Correctional Training Program. Refresher training is required to be taken by parole officers every two years.

Parole Officer Continuous Development provides parole officers a sound knowledge of the case management process and assists them in being able to apply relevant laws, CDs and procedures related to the duties of their position. Parole officers are required to complete five days of continuous development training each year. Three of these days are formal and are dictated by CSC while the remaining two days are at the discretion of the individual parole officers.

The following table summarizes the file review results based on data contained within CSC’s Human Resource database for the three standards for which data existed.

Table 1: File Review Results for National Training Standards Reviewed

Region	Suicide Prevention	Three Day Core - Parole Officer Continuous Development	Two Day Self Directed - Parole Officer Continuous Development
Atlantic	100% (6/6)	100% (6/6)	100% (6/6)
Québec	64% (7/11)	45% (5/11)	0% (0/11)
Ontario	92% (11/12)	92% (11/12)	92% (11/12)
Prairies	67% (8/12)	67% (8/12)	67% (8/12)
Pacific	67% (4/6)	83% (5/6)	100% (6/6)
Total	77% (36/47)	74% (35/47)	66% (31/47)

Source: Employee Training Summaries from the Human Resource Management System



4.1.4 Resource Allocation

We expected to find that resources were being allocated to the community in accordance with the workload formula.

Resources for parole officer and parole officer supervisor positions are being allocated in accordance with the workload formula.

Through discussions with Finance staff from both National and Regional Headquarters, we were able to confirm that the resources that National Headquarters calculated per the workload formula for both parole officers and parole officer supervisors were allocated to the districts. It was noted during our interviews that while the resources for positions have been provided to the Districts, the allocation of these resources to the sites is left to the discretion of the district directors. This ensures sites are given the appropriate number of positions to fulfill their requirements and also allows for flexibility to cover sick leaves and other staffing challenges that may arise.

During interviews with area and district directors, it was stated that they feel they are allocated an appropriate number of positions to effectively supervise offenders in the community. It was however noted that while they have the positions available, staffing them can sometimes be a challenge, whether it is trying to backfill for a parole officer who is on sick leave or trying to permanently staff a position. One of the challenges is that there is no delegated authority for hiring casual parole officers¹⁰. Another challenge stems from the requirement that prior to the parole officer working independently, they need to complete the two week Parole Officer Orientation training which is not offered at regular frequencies.

4.1.5 Monitoring and Reporting

We expected to find that a process exists to monitor and report performance relating to the supervision of offenders in the community at the district, regional and national levels.

No regular monitoring and reporting process exists in the majority of the districts.

In the majority of the districts, we found no evidence of a formal monitoring and reporting process. The exception to this was noted in the two Ontario districts which share an in-house Management Information System that provides regular reports and monitors trends as required. Using data from the corporate systems, this Management Information System provides up-to-date reports for parole officer supervisors, area directors and district directors on various subjects including monitoring the workload of individual parole officers and providing a snapshot of the offender population in the community.

¹⁰ Instrument of Delegation of Authorities in the area of Human Resource Management p. 23



In the majority of interviews, we were told that monitoring and reporting was extremely ad-hoc. Parole officer supervisors and area directors stated that no formal reports were being created; however some reporting does occur when special requests are made from Regional or National Headquarters. During the planning of the audit, we noted that RADAR has a community portal including a variety of information and reports which can be used by the community to track bring forward dates and other monitoring of trends and statistics. We noted during interviews with the various levels, that for the most part, RADAR is not widely used in the community offices.

District directors expressed concerns about the fact that the lack of a formal monitoring and reporting system does not allow for CSC to be pro-active when dealing with issues and trends regarding community supervision. During these interviews, many district directors said that this is a concern, and stated that they are currently in the process of creating their own means to monitor.

Conclusion

The key elements of a management framework are in place to support the supervision of offenders in the community. CDs related to community supervision are consistent with legislation and are generally well understood by employees. Roles and responsibilities are understood and parole officers are generally being provided with sufficient job relevant training. We also found that resources for parole officer and parole officer supervisor positions are being allocated to the Districts in accordance with the workload formula prepared by National Headquarters. Finally, we found that regular monitoring and reporting was occurring in only two of the eight districts across CSC.

Our audit showed that attention is required in the following areas:

- There is a need for cross referencing between current CDs and relevant case management and security bulletins to ensure that all requirements are being followed;
- There is a need for the districts to ensure that parole officers are compliant with their annual training requirements.; and
- There is a need for a standard approach for the monitoring and reporting of trends and data for offenders in the community.

Recommendation 1

The Assistant Commissioner Correctional Operations and Programs in collaboration with the Assistant Commissioner Policies should ensure that bulletins are easily accessible and that there is cross referencing between Commissioner's Directives and any applicable bulletins



Recommendation 2

Regional Deputy Commissioners, with the assistance of the Assistant Commissioner Human Resources Management, should ensure that parole officers are compliant with the training requirements as stated in the National Training Standards.

Recommendation 3

The Assistant Commissioner Correctional Operations and Programs should ensure that performance monitoring and reporting requirements are established to ensure each district has access to data to better supervise offenders in the community.

4.2 Compliance with Policy and Legislation

We assessed the extent to which CSC is in compliance with relevant legislation and policy relating to the supervision of offenders in the community.

4.2.1 Documentation

We expected to find that key documents were being completed as required by policy.

Correctional Plans and Progress Reports were not always reviewed or updated in accordance with policy.

The CD on Community Transition and Post-Release Assessment (CD 715-1) requires that parole officers review the Correctional Plan and Progress Report within the 30 day assessment period for newly released offenders. In 84% (99/118) of the files reviewed, we found evidence that these reports were reviewed within the 30 day timeframe.

The CD on Community Supervision and Monitoring (CD 715-2) requires that the Correctional Plan and Progress Report be updated, or at minimum reviewed, at specific frequencies based on the offender's current level of intervention. We found that for 88% (167/190) of the offenders in our file review, their Correctional Plan and Progress Reports were, at a minimum, reviewed at the appropriate frequency.

Casework records were not always being completed within the required timeframes.



A Case Management Bulletin issued in April 2008¹¹ states that casework records are to be entered in the Offender Management System as soon as possible, but no later than seven calendar days following the contact. Through our analysis we found that 24% (10/41) of the parole officers in our sample entered their case work records, on average, more than seven days following the supervision visit with the offender.

During interviews with parole officers we heard that while they ensure that the frequency of contact requirements are being met, the completion of casework records is considered to be a low priority in relation to the other duties of a parole officer. However should they note any concerns with the case, or should something significant occur during the visit, they will ensure that a casework record is completed immediately.

During interviews, both district and area directors discussed the importance of completing casework records in a timely fashion. When this does not occur staff needing to review the case, including other parole and duty officers, may make decisions and take a course of action without having access to the most current information.

Upon offender supervision being reassigned, there was limited evidence to support that parole officers were completing a full file review and conducting a case conference with the offender's current parole officer prior to commencing supervision of an offender

The Community Supervision Framework (CD 715) states that *"Prior to the reassignment of supervision of any case, the newly assigned Parole Officer must have a clear understanding of the critical elements of the Correctional Plan, the offender's offence cycle and any critical issues. In any reassignment of supervision, both the case conference and the completion of the full file review by the newly assigned Parole Officer will be documented in a Casework Record."* In 77% (62/81) of the offender files reviewed, we were unable to find documented evidence demonstrating that parole officers were completing a full file review prior to commencing supervision of the offender. Furthermore, in 48% (40/84) of the cases where reassignment occurred between two community parole officers, we were unable to find documented evidence that a formal case conference between them took place or was documented in a casework record.

During interviews with parole officers and parole officer supervisors we were told that it is routine practice to review the offender's case prior to supervision; however they said that they do not always complete a full file review. Parole officers discussed the importance of being familiar with the specifics of the case prior to the commencement of supervision. They said that they will typically review key documents including the Criminal Profile, recent NPB decisions and recent Correctional Plan and Progress Reports. Nevertheless, we found little evidence of these reviews documented in the casework records.

¹¹ Case Management Bulletin 2008-04-08: [Timeframes for Entries of Casework Records](#)



Parole officers and parole officer supervisors interviewed told us that regular communication exists between parole officers, including a discussion upon change of supervision. That being said, they do not always record these discussions in a casework record.

Staff Safety Assessments were not always being completed as required by policy.

The Community Supervision Framework requires the completion of Staff Safety Assessments by the parole officers and parole officer supervisors to assess the existence of any staff safety issues for each offender. This assessment must be completed within 10 working days and prior to the first community contact upon the initial release of an offender and upon case supervision reassignment. Additionally, Staff Safety Assessments must also be reviewed every 90 days for offenders who require tandem supervision.

In our file review we noted that 86% (97/113) of the required Staff Safety Assessments for an offender's initial release were completed in accordance with the policy. For Staff Safety Assessments completed for reassignment of supervision, we found completed assessments on file 90% (103/114) of the time; however 7% (8/114) of these were completed after the 10 day period.

Through our file review, we also identified concerns with the completion of the 90 day Staff Safety Assessments to review the offender's tandem requirement. For the 17 offenders in our sample who required tandem supervision, only seven of them (41%) had their Staff Safety Assessments completed every 90 days as required by policy.

4.2.2 Case Contact

We expected to find that supervision contacts with offenders were occurring in accordance with the various policy requirements.

Frequency of contact requirements are typically being met; however the contacts were not always conducted at regular intervals.

The CD on Community Transition and Post-Release Assessment states the required monthly contacts with the parole officer and the offender based on the offender's perceived level of risk. This interval ranges from a minimum of once every three months up to eight times per month. Through our electronic file review we were able to determine that the frequency of contact requirement was being met 88% (199/226) of the time.

During interviews with parole officers it was stated that maintaining the frequency of contact with their offenders is a priority in their workload. Parole officer supervisors stated that they use the corporate reporting tools to monitor compliance with frequency of contact to ensure parole officers are meeting with their offenders at the levels prescribed in policy. By examining the 12% (27/226) of offenders who we deemed to be



non-compliant with regards to frequency of contact, we found that two-thirds of those missed only one visit within the ten month period under review.

Our analysis also examined the timings of the visits within the period. We noted, on some occasions, that offenders would be visited frequently over a short period and would then go some time without another supervision visit. We also found in 11 of the 226 (5%) files reviewed, the offender had two contact visits in the same calendar day. Although the minimum frequency of contact was being met in these cases, this goes against the spirit of the policy, which is to ensure ongoing and regular contact with the offender.

Initial interviews are generally taking place within the timeframes prescribed in the policy.

The CD on Community Transition and Post-Release Assessment requires community parole officers to schedule a face-to-face interview with the offender within one working day of his or her arrival at the release destination. Through our file review, we determined that this requirement was being met in 90% (159/177) of the files in our sample.

A process exists in all districts to monitor the movement of Parole Officers in the community; however the process varies between sites.

The Community Supervision Framework states that “*District Directors will ensure that a reliable sign-in/sign-out system for each community parole office and Community Correctional Centre are established to ensure the safety of community staff.*” At all sites visited, the audit team was able to confirm that a process existed to track the movement of staff while visiting offenders in the community; however we found the process varied between sites. In many sites, we noted that a logbook is being maintained by the administrative staff and parole officers are to call-in at pre-arranged times throughout the day. Xx xxxxx xxxxx, xxxxx xxxxxxx xx xxxxx xxxxxxxx xx xxxxx xxxxx xxxxxxxxx xxxxx xxxxxxx xxxxxxxxx xxxxx xx xxxxx-xx xxxxx xxxxx xxxxxxx xx xxx xxxxx xxxxx xxxxxxx xxxxx xxxxxxxxx xxxxxxx xxxxx xx xxxxxxxxx.

Through interviews with parole officers, 83% (35/42) stated that they do not have any issues with their safety when they are meeting offenders in the community. The majority of those interviewed stated that they are more concerned about the neighborhoods they are visiting as opposed to the offenders themselves. The interviewees stated that they have a strong knowledge of their offenders and can use their observation skills to determine when their personal safety may be at risk. Xxxx xx xxx xxxxxxx xxxxxxxxx xxxxxxx xxxxx xxxxx xxxxx xxxxx xxx xxxxxxx xxxxxxx xxxxxxxxx xxxxxxx, xx xx xxxxxxxxx xxxxxxx, xxxxx xxxxx xxxxxxx xx xxxxxxxxx xxxxxxx xxxxxxx xxx xxx xx xxxxx xx x xxxxxxx xx xxxxxxx xxxxx x xxxxxxx.

Through interviews with area and district directors it was noted that they understand their responsibilities with regards to staff safety. They admit that while they provide the



monitoring procedures and state that they are mandatory, not all of the Parole Officers are following these procedures. A staff safety pilot project is currently underway at the Ottawa Parole office which involves parole officers regularly updating the National Monitoring Centre with their current location. It is anticipated that once funding is secured, the National Monitoring Centre will be expanding the pilot project to two other regions and will experiment with different types of monitoring processes.

Area directors overrode initial Staff Safety Assessments in 29% of the cases reviewed.

When completing the Staff Safety Assessment, tandem supervision will be required if one of the following criteria is met:

- The offender has a criminal history involving a sexual offence and/or death and is assessed as high risk at intake; or
- The offender has a criminal history involving a sexual offence and/or death and is classified as maximum security upon release.

During interviews with parole officers and parole officer supervisors, we heard that they believe tandem supervision criteria do not always target the correct offenders. For example parole officers stated that there is little staff safety concern from a pedophile, which would typically require tandem supervision, when compared to those with gang affiliations, which would not require tandem supervision.

Area directors are authorized to override the tandem requirement at their discretion. During interviews they told us that they will override when they are confident that the safety of the parole officer will not be compromised. We analyzed all instances of such decisions on the initial Staff Safety Assessment for offenders released within our scope period where one of the requirements for tandem supervision was met. For 108 of those 378 cases (29%), an area director overrode the requirement for tandem supervision. Reasons for the overrides were varied and included offences such as an offender being convicted of a sexual offence against a minor (43/108).

The fairly important percentage of overrides (108/378) raises questions as to the appropriateness of the criteria used for identifying the need for tandem supervision in the first place. The number of overrides also raises concerns whether the area directors might be too lenient with some of the offenders that they are overriding.

Tandem supervision is used when required, however very few tandem visits are occurring.

Tandem supervision refers to the requirement to conduct offender contacts in the community, including at the offender's home, with two individuals where an objective assessment of staff safety has been completed and risks have been identified. Contacts with the offender in the community are an essential component of good supervision as they enable the parole officer to gather information about the offender in



his or her environment and to see how well they are reintegrating into the community. These contacts may be conducted in the home, at the worksite, or in locations where the offender's circumstances may help to reveal whether progress is being made against the Correctional Plan.¹²

In our sample, we found 17 offenders who required tandem supervision during the period under review. Of the 17, only six of them had any community visits conducted either at the offender's residence or another location where tandem supervision was required. In one of these cases, we found no evidence to suggest that tandem supervision was always used when meeting with the offender at his/her residence. For the remaining 11 cases, we found that no true community contacts took place. At many offices, we were told that parole officers will avoid the requirement of tandem supervision by meeting the offender in the parole office, a police station or a public location such as a coffee shop. By not meeting with the offender at their home or at their worksite makes it more difficult for the parole officer to assess the offender's true progress.

4.2.3 Urinalysis Testing

We expected to find that the urinalysis testing process was being conducted in accordance with both the *CCRA* and CDs with regards to the selection of offenders, the collection of the sample and the reporting of the results.

Offenders are being tested for either alcohol or drugs when they do not have a NPB condition to abstain.

We noted a total of 16 offenders, representing eight percent of the files tested, where urine was tested for a condition for which he or she did not have an NPB condition to abstain. Eight of these cases involved an offender being tested for drugs and the other eight involved the offender being tested for alcohol when there was no such NPB condition.

Section 55(a) of the *CCRA* states that an offender may be subject to urinalysis where there are reasonable grounds to suspect that he or she has breached any condition of an absence or release that requires abstention from alcohol or drugs in order to monitor the offender's compliance with that condition. Section 55(b) states that offenders may be required to submit to urinalysis testing at regular intervals in order to monitor compliance with any condition of release requiring the offender to abstain from either alcohol or drugs. Testing of a substance not subject to a condition of release goes beyond the authority prescribed in the *CCRA*.

At many sites visited, we were told that offenders being tested for a condition which they do not have could be attributed to human error. We were also told that there was confusion regarding the procedure on collecting a urine sample for just one test. For

¹² CD 715-2, para 16



example, at one site we found that the Collector and Urinalysis Supervisor were unsure how to collect and submit only an alcohol sample, as they were under the impression that a drug sample always needed to be submitted.

During interviews with Urinalysis Collectors, we heard that it is not always clear the condition the offender is to be tested for. At some sites we noted that the collectors were provided with a urinalysis log sheet identifying the offenders to be tested and the substances being tested for. At other sites the “Notification to Provide a Urine Sample” form would clearly indicate whether the urine was to be collected for an alcohol test, drug test or both. We also observed at some sites that the decision of what urine sample was to be collected for was made by the Urinalysis Collector. For example, at some sites Urinalysis Collectors told us that they will typically test the offender’s urine for drugs unless told otherwise.

Roles and responsibilities for the Urinalysis Collector, Urinalysis Supervisor and Urinalysis Coordinator are not clearly defined.

We were unable to find clearly documented roles and responsibilities for the positions involved with the urinalysis process.

Most of the Urinalysis Collectors interviewed, many of whom are contractors, stated that they have never seen documented roles and responsibilities; however all of them stated that they clearly understand what is expected of them with regards to the collection of urine samples. It was stated that while some of the processes may vary, the actual role of a Urinalysis Collector changes very little whether collecting samples for CSC or for any other organization.

In most offices, the Parole Officer Supervisor is responsible for supervising the urinalysis program at the Parole Offices. However, as discussed in Section 4.1.2, the job description of the Parole Officer Supervisor makes no reference to any responsibilities relating to urinalysis with the exception of stating that they maintain and manage a section budget and authorize expenditures under section 34 for various tasks, which includes urinalysis. During interviews with the Parole Officer Supervisor, we found very little consistency on exactly what Parole Officer Supervisors feel that their role is with regards to supervising the Urinalysis program. For example, at some offices, the Parole Officer Supervisor maintains logs of urinalysis tests and results, ensures frequency for each offender's testing requirements are being followed, trains the collectors and ensures that results are recorded in a timely manner. In other offices, we found that Parole Officer Supervisors responsible for the urinalysis program view their responsibilities as extremely high level and may only schedule the days for collection to take place.

Urinalysis Coordinators, who typically are employed by the Security Branch at Regional Headquarters, also stated that they have not seen formalized duties of what their responsibilities entail with regards to urinalysis. It was stated that these duties typically represent less than 5% of their overall responsibilities. It was also stated that it is this



position that provides urinalysis training to both Collectors and Parole Officer Supervisors, and provides assistance to them should any questions regarding the policy or procedures arise; however they are unsure if there are any other duties regarding urinalysis for which they are responsible.

There is a lack of standardized training for the urinalysis program.

Concerns were also raised that there is no consistent training taking place in the various regions. At some sites, we were told that the Urinalysis Coordinator from Regional Headquarters regularly provides training, while at other sites we found that training is being provided by colleagues who have previously been trained. We also noted that each Region has developed their own training material and that there are no standardized national training guides with regards to urinalysis testing.

Notification forms are not being completed for each test.

CD 566-11 states that “All demands for a sample shall be presented to the offender using Notification to Provide a Urine Sample form (CSC/SCC 1064-1, Community).” Following a court ruling issued in December 2008, a Security Bulletin was issued in September 2009 further clarifying the requirement to provide this form for any requested urine samples.

In our review of 846 urine tests, we were able to locate a completed Notification to Provide a Urine Sample form for 160 of the samples collected, representing a compliance rate of 19% (160/846). From our review, we found that prior to the issuance of the Security Bulletin in September 2009, the compliance rate was 13% (55/413). For tests completed after September 2009, the compliance rate increased to 24% (105/433).

During interviews, it was stated that Parole Offices and Parole Officer Supervisors were aware of the new requirements; however they felt that the requirements are unreasonable and create unnecessary paperwork to complete. Some smaller offices said that it was a challenge to have the Notification to Provide a Urine Sample form signed by the Parole Officer Supervisor as they were often located in a different city from the Parole Officers.

Correctional Plan and Progress Reports are being completed to maintain the offender’s release in spite of a positive urinalysis result; however they are not always completed within the 14 day timeframe.

Policy states that, where there is a breach of condition of release, a positive urinalysis result or an inability or refusal to provide a urine sample, and a decision is made not to suspend the release of the offender, a Correctional Plan and Progress Report entitled “Release Maintained” must be completed within 14 calendar days following the day the breach became known. We found completed correctional plans and progress reports in 92% (45/49) of the cases where an offender had a positive urinalysis test and the



decision was made to maintain the offender's release. Of the Correctional Plans and Progress Reports that were completed, 24% (11/45) of them were not within the required 14 calendar day timeframe but were completed shortly thereafter.

4.2.4 Suspensions

We expected to find that the process relating to the suspension of offenders is being conducted in accordance with the *CCRA* and *CSC* CDs.

The overall process relating to suspensions is done in accordance with CDs and legislation.

Based on our file reviews of both the electronic and physical offender files, we found no compliance issues with how suspensions are being conducted. We found the key documents on file in 100% of the cases. We also determined through interviews that offices had plans in place to deal with in-office suspension. These plans are required to ensure that the staff in the parole offices is aware of the suspension that will take place thus ensuring their safety.

Conclusion

In general, *CSC* is supervising offenders in the community in compliance with the various CDs regarding community supervision. The audit noted that documentation is typically being completed when required and within any applicable timelines. We also noted that case contact with offenders is typically occurring as required by CDs. Furthermore, we found no compliance issues regarding the way suspensions are being exercised, both in terms of completing the required documentation and considering the safety of Parole Office staff.

Nevertheless, our audit showed that attention is required in the following areas:

- Casework records need to be completed in the timeframes specified in the seven calendar day timeframe specified in the policy;
- Full file reviews and case conferences need to be completed and documented in a casework record when there is a change of supervision;
- There is a need for a review of the CDs surrounding tandem supervision, including the criteria for tandem supervision;
- There is a need to ensure that staff safety assessments are being completed in accordance with the CDs; and
- There is a need to ensure that the requirements for urinalysis testing, including completion of the applicable forms and the selection of offenders, is occurring in accordance with policy.



Recommendation 4

The Assistant Commissioner Correctional Operations and Programs should review the sections of the CD regarding Tandem Supervision, including the criteria used for assessing offenders to ensure applicability.

Recommendation 5

The Regional Deputy Commissioners should ensure compliance with the CDs surrounding urinalysis, including ensuring that offenders are only tested for conditions specified by the NPB and that the appropriate paper work is completed for each urinalysis test.



ANNEX A

AUDIT OBJECTIVES AND CRITERIA

OBJECTIVES	CRITERIA
1. To provide reasonable assurance that the management framework in place supports the effective supervision of offenders in the community.	1.1 <i>Policy Framework</i> – CSC policies and guidelines are sufficient to support the supervision of offenders in the community and are consistent with the CCRA and the CCRR.
	1.2 <i>Roles and Responsibilities</i> – Roles and responsibilities related to the supervision of offenders in the community are clearly defined, documented and understood.
	1.3 <i>Training</i> – Training, including courses required as part of the National Training Standards, is being provided to and taken by individuals responsible for the supervision of offenders in the community.
	1.4 <i>Resource Allocation</i> – A process exists to allocate resources in the community in accordance with the resource formula.
	1.5 <i>Monitoring and Reporting</i> – There is a process established to monitor and report performance at district, regional and national levels regarding the supervision of offenders in the community.
2. To provide reasonable assurance that CSC is complying with relevant legislation and policy directives with regards to the supervision of offenders in the community.	2.1 <i>Documentation</i> – Key documents, in both the physical offender file and in OMS, related to case management such as casework records and CPPRs are being completed as required.
	2.2 <i>Case Contact</i> – Supervision contacts, such as collateral and community contacts, are taking place as prescribed in policies.
	2.3 <i>Urinalysis</i> – The selection of offenders, collection and reporting of urinalysis testing complies with the CCRA and CSC policies.
	2.4 <i>Suspension</i> – The decision and process relating to the suspension of an offender is done according to the CCRA and CSC policies.



LOCATION OF SITE EXAMINATIONS

REGION	SITES
Atlantic	<ul style="list-style-type: none">• Charlottetown Parole Office• Halifax Parole Office• Truro Parole Office
Quebec	<ul style="list-style-type: none">• Chicoutimi Parole Office• Granby Parole Office• Lafferrière CCC• Longueuil Parole Office• Québec Parole Office• Ville-Marie Parole Office
Ontario	<ul style="list-style-type: none">• Kingston Parole Office• Peterborough Parole Office• Sudbury Parole Office• St. Catharine's Parole Office• Team Supervision Unit• Women's Supervision Unit
Prairies	<ul style="list-style-type: none">• Brandon Parole Office• Calgary Urban Parole Office• Edmonton Rural Parole Office• Lethbridge Parole Office• Regina Parole Office• Winnipeg Parole Office
Pacific	<ul style="list-style-type: none">• Chilliwack CCC• Maple Ridge Parole Office• New Westminster Parole Office



AUDIT OF COMMUNITY SUPERVISION MANAGEMENT ACTION PLAN (MAP)

Recommendation:	Recommendation No. 1 The Assistant Commissioner Correctional Operations and Programs in collaboration with the Assistant Commissioner Policies should ensure that bulletins are easily accessible and that there is cross referencing between Commissioner's Directives and any applicable bulletins.
Management Response / Position:	<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Accepted in part <input type="checkbox"/> Rejected

Action(s)	Deliverable(s)	Approach	Accountability	Timeline for Implementation
<i>What action(s) has / will be taken to address this recommendation?</i>	<i>Expected deliverable(s) / indicator(s) to demonstrate the completion of the action(s)</i>	<i>How does this approach address the recommendation?</i>	<i>Who is responsible for implementing this action(s)?</i>	<i>When will action(s) be completed to fully address the recommendation?</i>
New policy will be reviewed every two years per the recommendation in the Report of the 2008 Policy Review Task Force. Links to policy bulletins made available on the Community Parole Officer Portal.	The draft case management policies, revised by the National Policy Review Team, include all updates from the bulletins.	The promulgation of the new policy will address the current challenges regarding clear sharing of information in policy. A two-year review cycle will ensure that CDs are modified as required thereby reducing the number of bulletins.	Future policy changes are the responsibility of COP, in collaboration with Policy.	New policy will be promulgated in fall 2010.



Recommendation:	Recommendation No. 2 Regional Deputy Commissioners, with the assistance of the Assistant Commissioner Human Resources Management, should ensure that parole officers are compliant with the training requirements as stated in the National Training Standards.
Management Response / Position:	<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Accepted in part <input type="checkbox"/> Rejected

Action(s)	Deliverable(s)	Approach	Accountability	Timeline for Implementation
<i>What action(s) has / will be taken to address this recommendation?</i>	<i>Expected deliverable(s) / indicator(s) to demonstrate the completion of the action(s)</i>	<i>How does this approach address the recommendation?</i>	<i>Who is responsible for implementing this action(s)?</i>	<i>When will action(s) be completed to fully address the recommendation?</i>
Regional Staff Training Coordinators (STC) to monitor training requirements to ensure compliance.	Review information provided for MAP updates.	This approach ensures that all training needs are identified and compliance with NTS requirements.	RDC The mandate is influenced by reliance on NHQ and RCSC Learning and Development. This impacts the timeline available for community staff to complete training due to operational requirements and exigencies.	Regional action plans implemented fall 2010.



Recommendation:	<p>Recommendation No. 3</p> <p>The Assistant Commissioner Correctional Operations and Programs should ensure that performance monitoring and reporting requirements are established to ensure each district has access to data to better supervise offenders in the community.</p>
Management Response / Position:	<p><input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Accepted in part <input type="checkbox"/> Rejected</p>

Action(s)	Deliverable(s)	Approach	Accountability	Timeline for Implementation
<i>What action(s) has / will be taken to address this recommendation?</i>	<i>Expected deliverable(s) / indicator(s) to demonstrate the completion of the action(s)</i>	<i>How does this approach address the recommendation?</i>	<i>Who is responsible for implementing this action(s)?</i>	<i>When will action(s) be completed to fully address the recommendation?</i>
Establish performance monitoring requirements for corporate reporting systems.	Identify data required Develop inventory of existing reports Define corporate reporting requirements Consultation with Performance Measurement and Management Reporting to establish parameters to develop standardized performance monitoring and reporting and timeframes	Development of standardized tools and guidelines will ensure that each district has access to relevant information to enhance management of offenders.	COP	Requirements identified by June 2011.



Recommendation:	Recommendation No. 4 The Assistant Commissioner Correctional Operations and Programs should review the sections of the CD regarding Tandem Supervision, including the criteria used for assessing offenders to ensure applicability.
Management Response / Position:	<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Accepted in part <input type="checkbox"/> Rejected

Action(s)	Deliverable(s)	Approach	Accountability	Timeline for Implementation
<i>What action(s) has / will be taken to address this recommendation?</i>	<i>Expected deliverable(s) / indicator(s) to demonstrate the completion of the action(s)</i>	<i>How does this approach address the recommendation?</i>	<i>Who is responsible for implementing this action(s)?</i>	<i>When will action(s) be completed to fully address the recommendation?</i>
Consultation on criteria for tandem supervision ACOCSS review of recommendations	Summary of national consultation to be provided as indicator of national consultation ACOCSS minutes provided as indicator of review	Review of the criteria will verify their applicability or will result in policy changes.	COP	Review of criteria for tandem supervision completed September 2011. Changes to policy, if required, completed December 2012.



Recommendation:	<p>Recommendation No. 5</p> <p>The Regional Deputy Commissioners should ensure compliance with the CDs surrounding urinalysis, including ensuring that offenders are only tested for conditions specified by the NPB and that the appropriate paper work is completed for each urinalysis test.</p>
Management Response / Position:	<p><input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Accepted in part <input type="checkbox"/> Rejected</p>

Action(s)	Deliverable(s)	Approach	Accountability	Timeline for Implementation
<i>What action(s) has / will be taken to address this recommendation?</i>	<i>Expected deliverable(s) / indicator(s) to demonstrate the completion of the action(s)</i>	<i>How does this approach address the recommendation?</i>	<i>Who is responsible for implementing this action(s)?</i>	<i>When will action(s) be completed to fully address the recommendation?</i>
Regional direction regarding requirements for the urinalysis program and monitoring to ensure compliance.	Emails/minutes/memos provided for MAP update	The clarification of requirements for the program and monitoring addresses the recommendation. The Management Control Framework assists in the monitoring of compliance with policies surrounding urinalysis.	RDC	Regional direction implemented fall 2010.



GUIDANCE FOR DEVELOPING A MANAGEMENT ACTION PLAN (MAP)

A management action plan (MAP) should include:

- *Recommendation*: The original recommendation being addressed.
- *Management Response / Position*: An indication of acceptance or non-acceptance of the recommendation by management (e.g. Accepted / Accepted in Part / Rejected).
- *Action(s)*:
 - If the recommendation is “accepted”, a clear, concise, and understandable description of the action(s) that has / will be taken for each recommendation should be provided.
 - If the recommendation is “accepted in part”, in addition to a description of any action(s) to be taken, an explanation as to why corrective action cannot be taken at this time or an explanation or justification why the recommendation is only being accepted in part. The component of the recommendation not accepted should be clearly stated.
 - If the recommendation is “rejected”, an explanation or justification why the recommendation is not accepted and, if applicable, an acknowledgement of management’s agreement to accept the risk of taking no action.
- *Deliverable(s)*: Expected deliverable(s) / indicator(s) to demonstrate that the implementation of the management action has been completed.
- *Approach*: Briefly describe how this approach / action(s) addresses / will address the recommendation.
- *Timeline for Implementation*: Timelines for the planned action(s) / deliverable(s) should be identified.



OTHER TIPS / SUGGESTIONS TO CONSIDER IN DEVELOPING YOUR MAP

Action(s):

- The proposed / planned action(s) should adequately address the recommendation findings outlined in the report as well as its' underlying cause(s) and produce concrete results at a reasonable cost.
- In order to assist in the evaluation of its impact on risk, if any, the proposed action(s) should be linked to the corporate risk profile or other risk, wherever possible.
- When identifying action items, consider the feasibility of implementation in terms of time, resources, priorities, etc.
- Consider the results or impacts of actions to be taken and how these will be measured to determine success.
- Where applicable, link management actions to ongoing initiatives within the organization to ensure that they are complementary and efficient.
- Certain issues can require relatively complex solutions which need to be implemented over an extended period of time; therefore, determining milestones and key dates can be important elements of your plan.
- If the action plan will be implemented over an extended period of time, any interim measures taken to mitigate the risk(s) should be identified.
- Consider any barriers, obstacles or conflicting priorities that might impede resolution of the issue or implementing the solution in a timely manner.
- Be realistic in the consideration of internal and external resources that are anticipated for executing the plan.