

Criminal Justice Information Policy

Assessing Completeness and Accuracy of Criminal History Record Systems: Audit Guide

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**Assessing Completeness
and Accuracy
of Criminal History
Record Systems:
Audit Guide**

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Steven D. Dillingham, Ph.D.
Director

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Part I

Introduction

A. Overview

The purpose of this *Audit Guide* is to provide assistance to State officials and others in planning and conducting audits to assess the completeness and accuracy of the criminal history record databases maintained by State central repositories. The *Guide* will also help State repositories assess compliance by State and local criminal justice agencies with statutory reporting and other legal requirements. The *Guide* describes methods of:

- (1) Auditing data quality levels of the central repository database by in-house methods and by methods that require reference to externally obtained information, such as validating sample repository records by comparison with original records of entry maintained by contributing agencies; and
- (2) Auditing contributing criminal justice agencies, either as a part of an audit of the repository database or as part of an ongoing local agency audit program.

The *Guide* deals in detail only with *data quality* auditing. It does not describe specific methods of auditing compliance with other aspects of recordhandling, such as limits on dissemination, security requirements or record subject access/review procedures. However, some sections of the *Guide*, including those that deal with pre-audit planning, selecting agencies to be audited, scheduling and conducting on-site audits, and structuring audit reports, are applicable to any kind of criminal history record audit. Agency officials who want to develop an audit program to police

compliance with all aspects of recordhandling policy should find the *Guide* useful in planning the *overall* audit methodology and designing specific audit techniques and data collection methods for auditing data quality. Audit techniques for other aspects of recordhandling can be found in other publications.¹

B. Approach of the *Audit Guide*

As noted, the *Guide* describes audit methods that can be used to conduct an assessment of the completeness and accuracy of the State central repository database (or designated segments of that database), as well as methods for auditing selected State and local agencies that report information to the repository. The techniques for auditing reporting agencies can be used as part of a repository database audit, if such an audit includes local agency site visits to validate sample repository records by comparing them with original records of entry maintained at the agency level. The techniques also can be used to conduct a program of ongoing compliance audits of local agencies, as required by Federal regulations² and the provisions of some State laws.

Part II of the *Guide* describes completeness and accuracy requirements, including those set out in Federal regulations and guidelines

¹ See, for example, SEARCH Group, Inc., *Audit Guide for Criminal History Records Systems* (Sacramento, Calif.: SEARCH Group, Inc., December 1982).

² 28 C.F.R. § 20.21(e).

and those established by State laws or regulations. Part III describes methods of auditing repository data quality levels by in-house analysis or by other means that do not require on-site audits of reporting agencies. Included are suggested methods of (1) conducting manual or computer analysis of the repository database; (2) comparing database entries with source documents stored at the repository; (3) comparing database entries with externally obtained case processing lists or statistical data; and (4) conducting auditing by mail. Part IV describes methods of conducting on-site audits of State and local agencies that report information to the repository. This section of the *Guide* sets out procedures for (1) selecting agencies to be audited; (2) selecting sample records to be validated by reference to original source documents; (3) formulating an audit methodology; (4) completing necessary pre-audit tasks; and (5) conducting the on-site audits. Part V describes the preparation of audit reports and suggests ways of reducing the burden of preparing multiple audit reports for ongoing local agency audit programs.

The basic purpose of a data quality audit is to determine the extent to which criminal justice transactions that are required to be reported to a central criminal record repository — for example, arrests, court dispositions, correctional reception and release — are fully and accurately *reported* in a timely manner and are accurately *entered* into the repository database. Some of these elements of data quality can be assessed at the repository, through audit methods described in the *Guide*, without reference to official records maintained at reporting agencies. For example, the accuracy of data entry procedures at the repository can be

assessed by comparing sample record entries drawn at random from the criminal history database with incoming reporting documents or computer tapes stored at the repository. Timeliness of reporting can be assessed by comparing the dates on which reported transactions occurred with the dates on which the reported information was received at the repository, if reception dates are logged, or the dates on which the information was processed at the repository, if these dates are logged. As a final example, analysis of the repository database by manual or automated methods can identify instances in which reportable transactions *apparently* occurred and were not reported — such as an arrest entry for which no disposition was received within a designated period or an entry showing a court conviction and a sentence to imprisonment not followed by a reported correctional segment within an appropriate period.

However, it is not possible to determine by such methods whether *all* reportable transactions were in fact reported fully and accurately. Such determinations require reference to official source documents maintained by reporting agencies, such as arrest logs, prosecutor files, court dockets and other case files. The most reliable method of making such determinations is by conducting site visits to selected reporting agencies to examine their records and assess the adequacy of their reporting procedures. This method of auditing, described in detail in Part IV, is highly accurate for two reasons: first, the auditor can establish that particular reportable transactions actually occurred; second, by comparing the official agency records of such transactions with repository records, the auditor can determine whether the transactions were reported fully and accurately and in a timely manner. This type of auditing is expensive, however, particularly if enough records are reviewed to yield statistically significant results — that

is, to establish data quality *statistics* of a known degree of accuracy and reliability, as opposed to *estimates* of unknown accuracy. For example, if the goal of a particular audit is to measure the accuracy and completeness of a designated segment of the repository database (such as all felony arrests and convictions occurring in the State during a designated period) and if statistically significant audit results are desired, the audit methodology may need to include selection of a rather large random sample of such cases followed by site visits to all of the reporting agencies involved in processing the cases. In this way, auditors can determine whether all required information was reported and whether it is accurately reflected in the repository database.

While statistically significant audit results may be necessary for some purposes, less accurate (and less expensive) audits may suffice for other purposes, such as for making a general assessment of data quality levels for planning purposes. Even if more accurate audit results are desired and reference to local agency records is deemed necessary to achieve such results, it may be possible to devise a workable audit methodology that does not require site visits to every single agency selected for inclusion in the audit. For example, it may be possible to obtain, by mail or other means, copies of appropriate portions of necessary agency source records, such as copies of arrest booking sheets for particular dates or copies of designated pages of court docket books. These copies can be used for purposes of determining whether the docketed transactions were accurately reported to the repository. It may even be possible, depending on the level of local agency cooperation that can be achieved, to persuade agency record clerks or other appropriate personnel to perform record validations of sample repository records and to mail in the results on data collection forms provided by the auditor. Finally, it may be possible to

obtain lists of reportable transactions from local agencies that can be used to determine whether all of the listed transactions were reported to the repository. These and other such audit methods are described in the *Guide*.

In summary, the *Guide* describes a wide range of audit methods that can be utilized singly or in combination in a particular audit, depending upon the goals of the audit, the desired accuracy of audit results, the resources available to the auditors and other such considerations. Factors that affect the reliability of audit results and other factors that affect the design of an audit approach and methodology are discussed in more detail in the substantive parts of the *Guide*.

Part II

Completeness and Accuracy Requirements

One of the first steps in planning an audit is to develop a list of applicable legal requirements and other standards or requirements applicable to the central repository and contributing local agencies. These requirements may be based on Federal laws or regulations, on State laws or regulations, or on other standards or requirements.

Federal regulations require all criminal justice agencies that have received U.S. Department of Justice funding for information systems³ to establish operational procedures to “[i]nsure that criminal history record information is complete and accurate.”⁴ This provision of the regulations goes on to state that complete records should be maintained at a central State repository and that any such repository record which contains information that an individual has been arrested “must contain information on any dispositions occurring within the State within 90 days after the disposition has occurred.”⁵ The provision defines “accurate” as meaning that “no record containing criminal history record information shall contain erroneous information”⁶ and provides

³ This means funding provided after July 1, 1973, by the Law Enforcement Assistance Administration or its successor agencies pursuant to the Omnibus Crime Control and Safe Streets Act of 1968, 42 U.S.C. §§ 3711 *et seq.*, as amended.

⁴ 28 C.F.R. Part 20, § 20.21(a).

⁵ 28 C.F.R. Part 20, § 20.21(a)(1).

⁶ 28 C.F.R. Part 20, § 20.21(a)(2).

that, to accomplish this end, criminal justice agencies:

[S]hall institute a process of data collection, entry, storage and systematic audit that will minimize the possibility of recording and storing inaccurate information and upon finding inaccurate information of a material nature, shall notify all criminal justice agencies known to have received such information.⁷

Thus, rather than establishing specific minimum data quality criteria that would be deemed acceptable (other than the 90-day disposition recording requirement), the Federal regulations establish a *goal* of accuracy and completeness and require State repositories and contributing agencies to implement operational procedures, including reporting, data entry and systematic audit procedures, designed to achieve that goal — that is, to ensure *maximum completeness* and *minimum errors* in the repository database.

Pursuant to this Federal requirement, most of the States have established at least *some* data quality standards and procedures, while other States have established comprehensive standards. State laws and regulations set out specific standards and requirements in such areas as the following:

- The types of offenses for which fingerprints and arrest/charge information must be reported to the repository by law enforcement agencies;

⁷ *Ibid.*

- The types, as well as the content and form, of case disposition information relating to reportable offenses that must be reported by prosecutors, courts, correctional agencies and other criminal justice agencies;
- The timeframes within which such information must be reported;
- The content and format of the criminal history record transcript and other inquiry responses provided by the repository; and
- Specific data quality procedures, such as disposition monitoring procedures, error notification procedures, inquiry-before-dissemination procedures and procedures for review and correction by record subjects.

In developing a list of applicable completeness and accuracy requirements for audit purposes, the auditor should obtain and carefully review all such State laws and regulations, as well as relevant reporting forms, instruction manuals, code tables and criminal history record output formats. Not only will these materials enable the auditor to establish specific data quality standards against which to assess agency performance, they will also assist in the development of an audit methodology and the structure of data collection forms and other audit documents, as explained in Part IV of the *Guide*.

In addition, Federal grant guidelines issued pursuant to recent Federal laws have established specific data quality standards and reporting requirements that may need to be reflected in the audit methodology, depending upon the purpose and scope of particular audits. For example, a 1990

amendment to the Omnibus Crime Control and Safe Streets Act requires the States to allocate at least five percent of their annual formula grant funds to data quality improvements, specifically including the identification and flagging of felony arrests and convictions.⁸ Another amendment to the Act requires the States to provide “notice” of alien convictions and upon request, certified copies of conviction records, to the Immigration and Naturalization Service (INS) to facilitate the deportation of such persons.⁹ The guidelines issued by the Bureau of Justice Assistance, U. S. Department of Justice to implement these provisions prescribe specific INS reporting requirements and establish minimum data quality levels and reporting requirements that must be met in order to obtain a waiver of the five percent set-aside requirement.¹⁰ These requirements and standards must be reflected in the methodology of any audit to assess adherence to these requirements.

Finally, on February 13, 1991, the FBI and the Bureau of Justice Statistics issued voluntary reporting and data quality standards recommended for adoption by State

and local criminal justice agencies as part of a nationwide effort to upgrade the completeness, accuracy and accessibility of criminal history records.¹¹ To the extent that these standards are adopted by particular States, they may need to be reflected in the methodology of audits conducted in these States if a goal of the audits is to assess the degree of compliance with these standards.

⁸ Crime Control Act of 1990, Pub. L. No. 101-647, 104 Stat. 4850 (codified as 42 U.S.C. § 3759(a)).

⁹ H.R. 3049, The Miscellaneous and Technical Immigration and Naturalization Service Amendments Act of 1991, amending § 503(a)(11) of the Omnibus Crime Control and Safe Streets Act of 1968, as added by § 507 of the Immigration and Naturalization Service Act of 1990 (December 18, 1991).

¹⁰ U.S. Department of Justice, Bureau of Justice Assistance, *Guidance for the Improvement of Criminal Justice Records* (Washington, D.C.: Government Printing Office, December 1991).

¹¹ U.S. Department of Justice, Federal Bureau of Investigation and Bureau of Justice Statistics, “Recommended Voluntary Standards for Improving the Quality of Criminal History Record Information,” *Federal Register* (13 February 1991) vol. 56, no. 30.

Part III

In-House Accuracy and Completeness Checks at the Repository

This section of the *Guide* describes ways to assess some aspects of the completeness and accuracy of criminal history record databases maintained by State central repositories without undertaking site visits to local criminal justice agencies that report information to the repository. Although these audit methods may not yield results that are as accurate and reliable as those obtained from site visit audits, they can be useful for many planning and evaluation purposes. Included are methods for:

- (A) In-house analysis of the criminal history database;
- (B) Comparison of the repository database with externally obtained offender processing lists or statistical information;
- (C) Comparison of the repository database with stored source documents; and
- (D) Conducting auditing by mail.

A. Analyzing the Criminal History Database

• Goal

The goal of this audit method is to determine as much as possible about the completeness, accuracy and timeliness of the repository database by manual or programmed analysis of the database itself. Audit procedures that may be used for this purpose include (1) reviewing error lists or other processing lists or reports routinely compiled by the repository; (2) conducting a programmed analysis of the criminal history database; and (3) conducting a manual analysis of randomly selected documents or database entries.

• Procedures

— Review Error Lists or Other Reports

Some States have laws or regulations requiring their repositories to institute “systematic audit” processes to minimize the possibility of recording inaccurate information and to provide for appropriate correction and notice when materially inaccurate information is discovered. Other legal provisions dealing with completeness require the repositories to establish procedures for regular and random system audits to check on conformance with arrest and disposition reporting requirements, including compliance with reporting time limits. Pursuant to these requirements, many of the repositories have instituted data entry review and edit processes to guard against the entry of erroneous information and “delinquent disposition monitoring” procedures to check on conformance with reporting requirements.

These and other such programs and procedures generate a variety of lists and reports that the auditor can use to make an assessment of some aspects of data quality. These include error lists, lists of arrest entries without prosecutor or court disposition entries, lists of court dispositions or correctional segments without corresponding arrest entries, and reports showing the elapsed time between the dates that reportable events occurred and the dates when the events were reported to the repository or entered into the criminal history system. If lists or reports such as these are produced by the repository on a regular basis, the auditor may be able to obtain lists for

any time period considered appropriate. The auditor should interview repository officials to determine what types of lists or reports are available.

— Conduct a Programmed Analysis of the Criminal History Database

If such error lists or reports are not produced on a regular basis, the auditor may be able to generate them using programs developed expressly for audit purposes. For example, in most automated repositories, it should be possible to determine the number and percentage of arrest events or case cycles in the criminal history database for which final court dispositions have and have not been recorded within appropriate timeframes. This can be determined for the entire database or perhaps for recent years only, depending on the purpose and scope of the audit. It should also be possible to determine the number and percentage of prosecutor or court segments received that do not have corresponding arrest entries, and the number and percentage of correctional entries that do not have arrest, prosecutor or court entries. As another example, most automated systems should be programmable to produce reports showing timeliness of reporting, based on the dates on which reportable events occurred and the dates on which the information was received or processed by the repository, if such dates are logged.

Programs used for the generation and analysis of such lists will need to take into consideration the fact that the absence of a particular entry in a particular case cycle *does not* necessarily mean that a reportable event occurred and was not reported. For example, the absence of a final

court disposition may be due to the fact that the offender was released without being charged and the police failed to report this action, or the fact that the prosecutor declined to prosecute the case and failed to report this decision. Similarly, the presence of a court or correctional entry with no corresponding arrest entry may not be due to failure of an arresting agency to report an arrest, but rather due to the fact that the case originated by indictment followed by the issuance of a summons in lieu of arrest.

It may be possible to accommodate some of these considerations in the design of the program to generate the lists or reports, depending on the way in which information is stored in the system and the ways it can be searched and analyzed. For example, the system may be able to generate lists of arrests or case cycles that are at least one year old and do not have *final* dispositions; that is, do not include trial court dispositions or entries indicating that the cases were terminated by police release without charging or prosecutor declination. For such cases, at least some disposition information can be assumed to be missing. Some of these missing reportable events probably can be identified by analyzing the recorded information. For example, if there is a prosecutor entry indicating the filing of charges in a particular case, there should be a court disposition (and an arrest entry, unless the record information shows that the case originated by indictment or by means other than arrest). There also may be other identifiable missing entries, such as bail or pretrial detention information.

For cases that *do* have final dispositions recorded, the system may be able to identify other missing reportable events. For example, if a particular case was terminated by a trial court disposition, there should be a prosecutor segment, an arrest segment (unless the case can be identified as one that did not originate by arrest) and perhaps other

segments, such as bail or pretrial detention entries. If the trial court disposition was a guilty verdict, there should be sentence information and, depending upon the sentence, a correctional component.

— Conduct a Manual Analysis of Database Entries or Documents

If reviews of the types discussed in the previous section cannot be performed by automated database analysis, the auditor may be able to perform them by manual analysis of a random sample of arrests or case events selected from the database of cases being audited. For example, if the purpose of the audit is to examine the completeness of records of felony cases initiated during the past five years and the system is able to identify felony arrests occurring during that period that do not have final dispositions but is unable to perform any further analyses of the types described above, the auditor may randomly select a manageable sample of such identified cases to be printed out for manual analysis. These transcripts can be examined to determine whether the recorded information indicates that reportable events are missing. In some cases, it may be clear that information is missing. In other cases, the auditor may need to contact appropriate criminal justice agencies to confirm that the cases are still actively pending or that reportable events have occurred that are not reflected on the sample transcripts. Depending upon the size and randomness of the sample, the results of such manual analyses may be used to estimate, with acceptable levels of confidence, the state of completeness of the broader segment of the criminal history database being audited — in this example, all felony arrests without dispositions identified by system analysis. (Random sampling techniques are discussed in Part IV.)

In systems that cannot perform any of the types of automated analyses described in the previous section, the auditor will need to rely entirely upon the manual analysis of

sample criminal history transcripts. As noted, however, analysis of a randomly selected sample can yield results that may be attributed with some degree of confidence to the larger database.

As mentioned earlier, the fact that particular reportable transactions are identified, through the above-described methods, as missing from criminal history transcripts does not necessarily indicate that the responsible criminal justice agencies failed to report the transactions. Rather, the repository may have failed to enter reported information, or the information may have been rejected by system edits and not corrected by the reporting agency due to the failure of the repository to return error lists or the failure of the agency to process those lists. Another possibility is that the information may have been reported properly and entered into the criminal history system, but may not have been linked to the proper case cycle due to the failure of the reporting agency to include appropriate tracking numbers or other linking information or the failure of repository personnel to enter the linking information accurately.

To understand the reasons for missing information, the auditor should examine such factors as data entry backlogs at the repository and should review procedures for generating and processing error lists. If unlinked disposition information is maintained in a separate segment of the criminal history database, the auditor should determine whether particular entries can be located through the use of agency case numbers or by other means. It may be possible to trace a sample of missing disposition information and to determine that some of the information was reported and entered into the system but failed to link. In this way, it may be possible to estimate, with acceptable accuracy, the percentage of missing entries of various types that were reported but failed to link and to establish why the linkage failures occurred.

Finally, *timeliness* of reporting can be assessed manually by selecting a sample of reporting documents that arrive at the repository on a particular day during the audit and noting the elapsed time from the dates on which the reported events occurred. The timeliness of data entry or fingerprint card processing by the repository can be assessed by the same method. If, for example, a review indicates that most fingerprint cards are arriving at the repository within three to five days after the date of arrest but the fingerprint cards being processed on the day of the review are two to three weeks old, this indicates a significant processing backlog.

B. Comparing the Database with Externally Obtained Information

• Goal

The methods of auditing the completeness of the criminal history record database listed in Section A rely upon analyzing the database to determine whether certain reportable events are missing, or appear to be missing, and making some determinations or assumptions concerning whether the events actually occurred and were not reported or recorded. Another method of auditing completeness — and accuracy, to some extent — is first, to establish by reference to externally obtained information that particular reportable events *did* occur and second, to examine the criminal history database to determine whether they are completely and accurately reflected on the appropriate records. This can be done by obtaining lists (or totals) of processed cases from reporting criminal justice agencies or from other sources.

• Procedures

— Assess Arrest Reporting Levels

Arrest reporting levels can be assessed by comparing the number of arrests reported to the repository

during a given period (the overall number and the number per agency, if available) with *Uniform Crime Reports* statistics or other arrest statistics available from the Federal Bureau of Investigation, the State's statistical analysis center or other sources. Although these methods may not yield precise comparisons, it should be possible to determine the approximate level of arrest reporting in the State and possibly to identify particular agencies that appear not to be complying with reporting requirements.

If available statistics of this kind are inadequate or insufficiently comparable to yield reliable results, arrest reporting levels can be assessed on a sampling basis by obtaining statistics, lists or other documents directly from selected arresting agencies for comparison with the criminal history database. For example, some arresting agencies may routinely compile statistics or even lists of fingerprintable arrests that can be provided to the repository. Others that do not routinely compile such statistics or lists may be able to generate them for a particular period, upon request, for purposes of the audit. Lists are especially useful since they may include subject identification information and case numbers (such as arrest numbers or other tracking numbers) that will enable the auditor to determine whether particular arrests are included in the repository database.

If lists of these types are not available, the auditor may be able to compile lists from copies of documents that can be obtained from arresting agencies. Some repositories require arresting agencies to submit copies of booking sheets, arrest dockets or similar documents to the repository on a regular or periodic basis. In other States, copies of such documents covering a designated period could be obtained for audit purposes, at least from selected sample agencies. Depending upon the information maintained in such source documents, the auditor may be able to assess both the incidence and

the accuracy of arrest reporting by determining whether fingerprint cards were received for all of the listed arrests and whether the identification and charge information on the cards matched the information on the booking documents. If the repository logs the date of receipt of fingerprint cards, as it should, compliance with reporting time requirements can be measured by comparing the dates of receipt with the dates of arrest. Arresting agencies also may be able to provide lists of arrests in which the arrested persons were released without charging; these can then be used to determine whether or not that information is included in the repository database.

— Assess Reporting by Other Agencies

Similar methods can be used to assess the incidence and, to some extent, the accuracy of reporting by other criminal justice agencies. For example, prosecutors may be able to provide lists of cases filed or not filed during particular periods, including cases that originated by indictment and summons. Courts may be able to provide lists of cases filed and adjudicated and of convicted offenders sentenced to probation or incarceration. Parole and probation agencies and correctional institutions may be able to provide lists of persons admitted to or released from incarceration or supervision. Again, some of these agencies may already generate such lists on a regular basis. Others that do not may be able to generate them upon request for audit purposes. Comparison of such lists with the repository database can provide a highly accurate test of database completeness and of agency reporting rates, particularly if the lists include tracking numbers or other data that enable the auditor to accurately locate the listed transactions in the criminal history system or to determine with certainty that they are not included.

If auditors can obtain these types of lists in a form that permits automated comparison with the

repository's criminal history database, it may be possible to audit all listed events for the period audited. If the lists cannot be obtained in such form or if the number of cases is too great, it may be necessary to undertake manual comparisons on a sample basis.

If agency processing *lists* of the types described above cannot be obtained, it may be possible to obtain *statistical* information that may be useful for audit purposes. For example, if a particular agency can provide the number of reportable transactions occurring during a selected period, such as the number of convictions on felony charges in particular courts, the repository database can be analyzed to determine whether that number was reported. Although this method does not yield results as accurate and reliable as those obtained through comparison of lists of identifiable transactions with the database, it can yield useful information about the completeness of the database.

C. Comparing the Database with Stored Source Documents

• Goal

The goal of this audit method is to assess the accuracy of *data entry procedures* at the repository by comparing the information on a selected sample of criminal history transcripts with fingerprint cards, case filing notices, disposition reporting forms or other such incoming source documents on file at the repository.

• Procedures

Some repositories perform comparisons of this type on a regular basis as part of ongoing data quality maintenance procedures. If records of such comparisons are available, the auditor should obtain them for review. These records may be sufficient to enable the auditor to

determine whether data entry procedures are adequate to prevent the entry and storage of inaccurate information.

If independent assessment is considered appropriate, the auditor should select a random sample of stored reporting documents for comparison with repository database entries. The scope of the database segments that can be audited in this way will be limited by the types of source documents that are on file at the repository, the period of time the stored documents cover, and the difficulty of locating and searching them. In any case, because most repository systems are continuously enhanced and because data entry procedures usually are changed from time to time to incorporate additional edits and other data quality safeguards, it will probably be more useful to select the sample cases from relatively recent records in order to assess the efficiency of data entry procedures currently in effect. However, the auditor may wish to include some older records in order to compare audit results for those records with audit results for more recent records to assess the impact of newly implemented data entry procedures.

The types of in-house comparisons that can be undertaken will be determined by the manner in which information is reported to the repository and the types of reporting documents maintained by the repository. If fingerprint cards for all reported offenses are maintained by the repository (or are obtainable from the identification bureau, if it is a separate agency), the auditor can confirm that positive identification was accurately established in the sample cases and also can determine whether arrest information was accurately entered from the fingerprint cards. If custody fingerprint cards submitted by correctional institutions are maintained, the auditor can assess the accuracy of the correctional components of the sample cases. If prosecutor and court information is

reported on paper forms and these forms are kept on file, the auditor can assess the accuracy of data entry procedures for this type of information. If certain types of information is reported on magnetic tape, the extent to which these types of in-house audits can be performed will depend upon such factors as whether the tapes are retained and stored and whether they can be transcribed for audit purposes.

In selecting the sample database entries and reporting documents to be audited, the auditor can select *separate* samples for each type of information (for example, offender identification data, arrest charge data, prosecutor data, court disposition data and correctional data). Or the auditor can select sample case *cycles*, and all of the recorded information for these cases can be audited against all of the stored source documents pertaining to them. The advantage of selecting separate data segment samples is that equal numbers of each type of reported information can be selected, whereas selection on a case cycle basis may not yield sufficient court and correctional segments for audit purposes, depending on the method of selection. An advantage of auditing at least *some* entire case cycles is that this method of audit can reveal ways in which data entry errors at one stage of processing can affect the entry of other types of information. For example, inaccurate entry of a case tracking number from a fingerprint card can cause a linkage failure of subsequently reported disposition information. The auditor may be able to confirm that some disposition information for sample cases was reported and accurately entered, but failed to link because of earlier data entry errors.

It should be kept in mind that this method of auditing can measure only the *accuracy* of data entry procedures at the repository. It cannot determine whether all reportable transactions that occurred were reported nor whether reported information accurately reflects what actually happened in the cases.

D. Auditing by Mail

• Goal

Another method of auditing the repository database without undertaking site visits to local agencies is to mail audit questionnaires or data collection forms to the agencies and request that they make necessary comparisons or provide requested information by return mail. This method of auditing can be used to check both accuracy and completeness.

• Procedures

To audit the accuracy of the repository database, sample criminal history entries can be printed out and mailed to the submitting agencies with a request that the information be compared with agency source documents and either confirmed as accurate or corrected, if necessary. Completeness can be assessed by selecting a sample of cases that appear to lack disposition information and sending lists of these cases, with available case numbers and other identifying information, to the appropriate agencies requesting that they determine from their records whether dispositions have occurred. If dispositions have occurred, the agencies can be requested to provide copies of source documents or to submit completed reporting forms to enable the repository to update the records.

This method of auditing necessarily depends upon the cooperation of the audited agencies. Cooperation can be increased by recruiting high-ranking officials, such as the Attorney General or the State Court Administrator, to contact local agencies and encourage them to respond fully. Even with such assistance, however, it is likely that not all agencies will respond fully, despite follow-up mail and telephone requests, and some may not cooperate at all. In addition, the auditor cannot rely entirely upon the accuracy of the responses. Despite

these shortcomings, however, this method of auditing can yield useful results and may be the only method of “outside” auditing possible if resources are not available for site visits to reporting agencies. In combination with some of the other in-house audit methods discussed above, auditing by mail can provide an assessment of data quality that is reliable enough for many purposes. Procedures for selecting sample cases for mail auditing and appraising the accuracy of audit results are generally the same as those discussed in Part IV of the *Guide*, which deals with on-site visit audits.

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Part IV

Site Visits to Reporting Agencies

This section of the *Guide* describes procedures for auditing sample criminal history records by conducting site visits to the agencies that report case processing information to the repository. This method of auditing is the most accurate and reliable because the auditor is able to determine from original records of entry on file at the audited agencies what reportable events actually transpired in the sample cases and to determine the extent to which the required information about these events was completely and accurately *reported* in a timely manner and completely and accurately *entered* into the criminal history record system. In addition, by observing agency procedures and interviewing agency personnel, the auditor can determine the reasons for data quality deficiencies and can formulate recommendations to remedy them.

Site visit auditing is expensive, however, especially if enough agencies are audited and sample sizes are large enough to yield audit results that can be attributed to the entire criminal history record database with a high degree of confidence. For this reason, it is likely that most audits of State repository databases will combine *limited* site visit audits with some of the other audit methods described in Part III of the *Guide*. For example, the auditor may use some of the methods of in-house database analysis and review described in Part III to obtain an overall view of the completeness and accuracy of the criminal history database and may only perform site visit audits of *selected* agencies to validate records selected from *segments* of the criminal history database rather than the entire historical database. Furthermore, for purposes of particular audits, it may

be deemed acceptable to select fewer records for audit than would be required to obtain highly accurate results. Finally, the auditor may utilize mailed audit forms to validate samples of information reported by at least some of the agencies not chosen for an on-site audit. By combining audit methods in this way, the auditor should be able to devise an audit methodology that can be supported by available resources and that will yield results that are adequate for most audit purposes.

As pointed out earlier, the *Guide* envisions that site visit auditing may be undertaken for purposes of two types of audits:

- (1) Annual or periodic audits of the repository database; and
- (2) Audits conducted as part of an ongoing program of local agency audits to verify compliance with reporting and other legal requirements.

In the first type of audit, the auditor will select a random sample of the types of information being audited from among all of the entries of that type in the database — such as all felony arrests occurring in the State during the past five years — and will validate these sample records by comparing them with original entry records maintained at the agencies that submitted the information. Since the records are selected at random from among all entries of a particular type in the database, the sample is likely to include records submitted by most of the agencies in the State that report information of the type being audited, with larger agencies heavily represented and smaller agencies represented by only a few records. The large number of reporting agencies typically encompassed

within this type of auditing is the primary reason it is so expensive.

Site visit auditing may also be undertaken as part of an ongoing program of local agency audits to determine whether they are complying with reporting requirements. In such cases, the sample record entries to be validated for completeness and accuracy are selected from among entries submitted by those agencies selected for audit. For this reason, the audit results can be reliably attributed only to the audited agencies themselves. While the results of particular audits of this type cannot be assumed to accurately reflect the quality of the broader repository database, the cumulative results of numerous such audits can provide a useful assessment of overall repository data quality levels.

Although the criteria for selecting agencies and records to be audited may vary depending on the purpose of the audits and the nature of the audit program undertaken, the auditing procedures described below can be used for any type of auditing that includes site visits to reporting agencies, including audits to assess compliance with requirements other than data quality. The procedures comprise a *generic* audit approach that should be workable in most States. The approach set out here, however, may need to be tailored in particular jurisdictions, depending on the purpose and scope of the audit(s) to be undertaken, and many of the procedures described below will need to be refined to conform to local conditions, practices and legal requirements.

The following sections describe procedures for:

- (A) Selecting agencies to be audited;

- (B) Selecting sample cases to be validated;
- (C) Formulating an audit methodology;
- (D) Completing pre-audit tasks; and
- (E) Conducting the site visit audits.

A. Selecting Agencies to be Audited

• Goal

This section describes procedures for selecting agencies for on-site audits. Because such audits are extremely time-consuming and State repositories have very large numbers of State and local criminal justice agencies reporting information to them, it is clear that some method for selecting agencies to be audited must be developed that yields a manageable and affordable number of agencies, yet provides audit results that are as valid as possible. The aim should be to audit as many agencies as resources permit and to select agencies that provide as representative a review as possible of the aspects of data quality targeted by the audit.

• Procedures

Agency selection procedures depend upon the type of audit undertaken and the audit approach used. If it is a data quality audit of a segment of the repository database and is designed to yield highly accurate and reliable results, the sample cases selected for validation will need to be chosen at random and may well include cases from hundreds of agencies scattered throughout the State. Site visits to all of these agencies may be impossible. In many States, however, a relatively small number of agencies in large metropolitan areas may account for a high percentage of the sample cases. If this is the case, it may be feasible to schedule site visits for all of these large agencies and to rely on other

methods of audit for the other agencies. For example, mailed audit forms may be used for the other agencies and, if they do not respond after follow-up contacts, site visit audits may be scheduled for some of them. The reliability of the responses received by mail can be increased by requiring the responding agencies to provide copies of source documents used for validating sample cases. Although it is likely that responses will not be received for all sample cases, it should be possible to obtain responses in enough cases to ensure the accuracy and validity of the audit records.

If the audit program to be undertaken is an ongoing series of local agency audits to police compliance with reporting and other legal requirements, selection criteria might differ from those described above. Such a local agency audit program might be designed to respond primarily (at least for the first few years) to problems or deficiencies identified through systematic sampling and other ongoing data quality monitoring techniques employed by the repository. As noted earlier, most repositories employ a variety of systematic auditing procedures and generate various lists and reports reflecting the results of these procedures. On the basis of these reports and other available information, the repository may be able to identify particular data quality problems that are common to numerous agencies, such as poor court disposition reporting, or particular agencies that appear to have serious reporting problems. The agency selection criteria for the audit program might properly be weighted toward inclusion of such agencies. Pursuant to such an approach, a particular State might decide to audit only arresting agencies or courts for the first few years of the local agency auditing program.

As another example, the selection criteria for a particular year might be weighted to include agencies that have recently implemented

automated reporting procedures or other procedural enhancements that impact data quality. These and similar factors might properly influence the selection of agencies to be audited in a given year or years so long as the on-going audit program is designed to include, over a period of years, agencies of all sizes, types and geographic location: large and small jurisdictions, urban and rural agencies, high- and low-volume agencies, automated and manual agencies, arresting agencies, detention centers, prosecutors' offices, trial and appellate courts and correctional agencies.

Another factor affecting the selection of agencies to be included in a local agency audit program is that it is generally more economical, and in some cases more useful, to conduct audits on a *jurisdiction* basis rather than on a *single-agency* basis. Instead of selecting agencies from a list of eligible agencies of a particular type without regard to where they are located (which might result in inclusion of only one agency in most audited jurisdictions), the auditor would select a number of jurisdictions — cities, counties or judicial districts, for example — and audit *all* of the criminal justice agencies in those jurisdictions: police departments, prosecutors, courts and correctional agencies. This approach obviously saves travel costs and auditors' time. It also yields results that reflect the quality of *all* types of information. Perhaps more important, however, is that this approach enables the auditor to understand how record creation procedures, reporting procedures and even case processing procedures in particular agencies can affect reporting procedures and data quality levels in other agencies in the jurisdiction. This helps the auditor to better understand the reasons for particular deficiencies or problems and to formulate more responsive and realistic recommendations for remedying them. This audit approach is particularly effective if the *same* sample cases are audited in

the various agencies in a particular jurisdiction; that is, if the auditor selects sample cases from the jurisdiction and audits all of the information concerning those cases that was reported or should have been reported by all of the agencies involved in processing the cases. For example, if a particular sample case began by arrest and progressed to a conviction and incarceration of the offender, the auditor would follow the audit trail of that case through the entire process and ultimately to the repository and the sample record transcript. If the court disposition was not shown on the transcript, the auditor might find that the court failed to report the disposition; that the court accurately reported the required disposition and sentence data but reported an inaccurate tracking number passed along by the police; or that the court reported all required information fully and accurately, but the information failed to link properly because the police failed to fingerprint the offender since he was already in custody on an earlier case. There are many nuances of interagency relationship and many case processing peculiarities of this type that can affect reporting performance and that might be missed by an audit approach focusing on only one criminal justice agency in a particular jurisdiction.

B. Selecting Sample Records

• Goal

This section discusses a number of ways of selecting sample records to audit and a number of factors that affect the selection methodology and the sample size. The goal is to select a sample that is designed to yield audit results of the accuracy and reliability desired while simplifying as much as possible the tasks of locating the sample records and the agency files that must be accessed to validate them.

• Procedures

— Devise a Selection Methodology

Factors to consider in devising a record selection methodology include, among others, the types of records to be selected, and where and how the records will be selected. The types of records to be selected will be determined primarily by the purpose and scope of the audit. For example, if the audit is part of a continuing program of regularly scheduled local agency audits and the agencies to be audited in a particular year are police departments, the auditor would select reportable events (arrest and charge information) submitted by those agencies during that year. These case segments might be selected directly from the repository's criminal history database or from its fingerprint file.

On the other hand, if the audit is to be conducted on a complete-case basis in selected jurisdictions, the auditor would (1) select sample cases processed in the particular jurisdictions; and (2) obtain transcripts of all of the information concerning these cases submitted to the repository by all of the agencies involved in processing them — police agencies, prosecutors, courts and correctional agencies. For example, the sample cases could be selected from among all arrest cases reported to the repository by the arresting agencies in the selected jurisdictions during the period covered by the audit. However, this selection process has the disadvantage of including many sample cases that do not contain prosecutor, court or correctional segments, since some arrests do not result in charges being filed, while some cases that *do* result in charges being filed are terminated before progressing all the way through the system. In order to ensure that the sample cases include enough court and correctional segments to provide a reliable audit of these types of information, the auditor can select the sample cases from among cases in the repository database that include these data segments. This method of

selection might be particularly appropriate if a major concern of the audit is to assess the accuracy of court or correctional reporting.

As suggested above, sample cases can be selected directly from the repository database. They can also be selected from the files of audited agencies. For example, if a major goal of a particular audit is to measure the completeness and accuracy of felony court disposition reporting, the sample cases might be selected from among cases filed in the felony trial courts of the particular jurisdictions during the period covered by the audit. This ensures the inclusion of trial court segments in all of the sample cases (and a high proportion of correctional segments as well) and provides a more reliable assessment of reporting, since cases may be included in the sample that were not reported to the repository and might not have been included in the audit if sample cases had been selected only from the repository database. A disadvantage of this selection approach is that additional site visits to audited agencies may be required to select the sample cases. Another disadvantage is that, depending upon the filing and numbering systems of the audited agencies and the ways in which cases can be retrieved from the repository database, it may be difficult to locate all of the criminal history transcripts and fingerprint cards for the selected cases. The auditor should discuss this issue with repository officials (if he is not already familiar with these factors) and should devise a case selection approach that will (1) yield sample cases that include the types of case information to be audited; (2) simplify the location of sample criminal history transcripts and other documents (for example, fingerprint cards and reporting forms) at the repository; and (3) simplify the location of case files at all of the audited agencies.

Even if the primary audit methodology calls for selecting sample cases from the repository

database, the auditor might consider selecting a few cases from the files of the audited agencies as a “reverse audit” of compliance with reporting requirements. For example, if the audited agency is a police department, a few arrests for fingerprintable offenses might be selected from the department’s booking log during the audit and inquiries might later be made at the repository to determine whether fingerprint cards were submitted as required for all of those arrests.

— Generate Sample Case Lists

Once the sample case selection methodology has been determined, sample case lists can be produced in a number of ways. Statistical sampling software is available that can generate a list of randomly selected case numbers from the population of cases to be audited, based upon starting and ending case numbers for the segments of the database to be included. The auditor also can use random number tables which can be generated by computers or can be obtained from statistical sampling textbooks.¹² Such textbooks also describe other sample case selection methods, including the selection of every *n*th case from random starting points in the segments of case numbers to be audited. Whatever method of selection is employed, the auditor should generate more sample case numbers than the number of records needed for inclusion in the sample (sample size is discussed in the next section). This will facilitate the selection of extra sample cases to

replace cases that may need to be excluded from the sample because they are deemed inappropriate. These may include noncriminal motor vehicle cases, nonsupport cases, game law violations or other types of cases that may be included within the sampled population but may not be considered appropriate for audit. Extra sample cases may also be necessary because of case numbering errors or other such anomalies. A good rule is to select about one and one-half times the number of case numbers needed.

— Select a Sample Size

As pointed out earlier, for some types of auditing it may not be necessary to employ sampling techniques designed to yield statistically significant or reliable results in a technical sense. Factors such as time, resources, availability of personnel and the intended use of audit results can properly influence the selection method and sample size and the resultant reliability of audit results. For example, if the primary purpose of a particular review of the repository’s criminal history database is to determine, for planning purposes only, the approximate level of reporting for a particular type of information, it might not be considered necessary to draw a purely random sample of a size sufficient to yield highly reliable results. A one-month chronological listing of inquiry responses might be used and the audit results for these cases might be considered sufficiently reliable even though they provide only an inexact estimate.

On the other hand, if the purpose of the audit sampling is to derive completeness rates and accuracy rates to be included in a report to a State legislative budget hearing or in a report prepared in response to a court order, the sampling techniques utilized might need to be more precise. Similarly, if the audit is undertaken pursuant to a Federal or State law, that law (or regulations issued under it) might expressly require that the audit be performed in

accordance with established statistical sampling procedures. In such cases, the auditor will need to select a sample size and employ sample case selection techniques that will yield audit results that can be attributed with a high degree of confidence to the larger database from which the sample cases are drawn. If the auditor does not have the requisite expertise in these areas, the auditor should consult someone in the office who has statistical sampling experience and knowledge or someone in some other State office, such as the statistical analysis center, the office of the legislative auditor or the statistics department of a State university.

Generally, however, if highly accurate and reliable audit results are desired, the required sample size for particular degrees of accuracy and reliability can be determined by using sampling tables obtained from statistical sampling textbooks such as those cited earlier or computer software programs designed for statistical sampling. For either method, the auditor will need to be familiar with the following concepts: (1) population size and sampling frame; (2) population variance (or error rate); (3) the desired “confidence level” and “precision factor” of the audit results; (4) one-tailed versus two-tailed tests; and, (5) statistical “power.”

Population size is the total number of cases in the criminal history file or file segments from which the sample cases will be drawn. If, for example, the sample cases are to be drawn from cases filed in the felony trial courts of a given jurisdiction during the previous five years, and those courts number cases consecutively by calendar year, the population size could be determined by the beginning and ending case numbers for the years to be sampled. If cases are to be drawn from the criminal history database of the repository or segments of that database, population size probably could be determined or accurately estimated by computer

¹² See, for example, Arthur J. Wilburn, *Practical Statistical Sampling for Auditors* (New York: Marcal Dekker, Inc., 1984); Herbert Arkin, *Handbook of Sampling for Auditing and Accounting*, 3d. ed. (New York: McGraw-Hill Book Co., 1984); and Henry P. Hill and others, *Sampling in Auditing* (Huntington, N.Y.: Robert E. Kreiger Publishing Co., 1979).

analysis of the database segments to be included.

A *sampling frame* is the actual list from which the sample is selected. The sampling frame may be a pre-existing list (for example, a police booking sheet) or it may consist of a computer-generated list of numbers which correspond to an agency's filing system. It is critical that the auditor understand that a properly drawn sample will provide information that is statistically relevant to the population of elements comprising the sampling frame — and nothing more. It is common for persons to generalize their findings to the population — indeed, this is the usual purpose of drawing a sample — but the validity of the generalization depends upon the extent to which the sampling frame reflects the population.

Population variance indicates how homogeneous the underlying population is, and this affects the sample size. For example, if all persons in a population had the same blood type, then a sample of one person would suffice. On the other hand, if everyone had a different blood type, then everyone would have to be included in the sample. Thus, the more homogeneous the population, the fewer cases required. The average time to receipt of final disposition could be used as an example for repositories. If Repository A's average time ranged from zero to six months, while Repository B's average time ranged from zero to one year, then Repository A's data would be more homogeneous. All else being equal, an audit of average time at Repository A could be conducted with a smaller sample size than possible at Repository B.

For most criminal history record audit purposes, population variance will be generally equivalent to the error rate, or noncompliance rate, in the sampled population with respect to a particular attribute of data quality. For example, if the purpose of a particular sampling project is to establish the level of reporting of

felony court dispositions, the error rate would be the percentage of such dispositions that are not reported. As another example, if the purpose of sampling is to determine the level of accuracy of reported disposition information, the error rate would be the percentage of reported dispositions that include inaccurate information.

As pointed out above, population variance (error rate) is an important factor in determining required sample sizes. The challenge for auditors is that error rates generally are not known in advance and must be estimated. Such estimates can be based upon prior audits or reviews, computer analyses of the type described earlier or other known statistical data. It is important that these estimates be as accurate as possible because (1) computed sample size affects the amount of time and resources that must be allocated for the sampling project; and (2) the reliability of audit results derived from sampling will be adversely affected if the error rate derived from examination of the sample records turns out to be significantly greater than the estimated error rate used in determining the sample size (see examples below).

Precision factor and *confidence level* define the accuracy and reliability of audit results and can be established in advance according to the goals of the audit. The *precision factor* refers to the estimation range (for example, plus or minus x percentage points) within which audit statistics derived from examination of sample cases can be assumed to reflect the quality of the population of cases sampled. A common example of precision factor in a different context is when the media reports polling results that show that candidate A is preferred by 30 percent of voters, plus or minus three percentage points. *Confidence level* refers to the certainty with which the audit results derived from examination of the sample cases can be attributed (within the chosen

precision factor) to the entire population of cases from which the sample was drawn. For example, a chosen confidence level of 95 percent together with a chosen precision factor of plus or minus three percentage points would mean that the audit results derived from the sample cases could, with 95 percent confidence, be attributed to the sampled population within a range of plus or minus three percent. In other words, an error rate of eight percent computed from the sample would mean that it is 95 percent certain that the error rate in the sampled population is between five and 11 percent.

Excerpts from statistical sampling tables designed for determining sample sizes are set out in Figures 1 through 3. These tables show how sample size is affected by the population size, the estimated error rate, and the chosen values for confidence level and precision factor. Confidence level and precision factor have the greatest impact on sample size. For example, Figure 1 shows that for a database (population) of 100,000 records of the type being audited, with an estimated error rate of 5 percent or less, the size of a random sample needed to yield audit results with a confidence level of 95 percent and a precision factor of plus or minus three percent would be 202 records. Increasing the desired accuracy by narrowing the precision factor to plus or minus two percentage points would more than double the necessary sample size to 454 records. Figure 2 shows that for the same example of 100,000 records, increasing the desired confidence level from 95 to 99 percent would increase the sample size needed for a precision factor of plus or minus three percent to 349 records and for plus or minus two percent to 782 records.

Surprisingly, compared to confidence level and precision factor, the size of the population of records being sampled has only a slight impact on sample size. In the original example cited in Figure 1

(estimated error rate of five percent or less, confidence level of 95 percent and precision factor of plus or minus three percent), increasing the population size from 100,000 records to 500,000 records would increase the sample size by only one record (see Figure 1).

As stated earlier, however, the estimated error rate in the population of records from which the sample is to be selected does have a significant impact on sample size. Figure 3 is an excerpt from a table designed for determining sample sizes for a 95 percent confidence level and an estimated error rate of 10 percent. The number of records that must be drawn from a population of 100,000 records for a precision factor of plus or minus three percent is 383, almost twice the number needed if the estimated error rate were five percent, as in the earlier example. For this reason, audit results derived from random samples selected pursuant to the procedures described here are accurate to the indicated degrees of confidence level and precision factor only if the actual error rate encountered when validating the sample records is equal to or less than the estimated error rate used in determining the sample size. If the actual error rate in the sample records proves to be substantially larger than the estimated error rate, the reliability of the audit results will be significantly affected because the sample will have turned out to be too small. In such a case, more records will need to be added to the sample or, if this is not practical, the reliability of the audit results must be revised. Figure 4 is an excerpt from a table that can be used in such cases to “appraise” the audit results; that is, to compute the actual precision factor for the audit results based upon population size, chosen confidence level and the actual error rate. The table shows that for the original example cited above (population of 100,000 records, confidence level of 95 percent and desired precision factor of plus or minus three percent), if the actual error rate in the sample

records turns out to be 15 percent instead of the five percent estimate used in determining the sample size, the actual precision factor of the audit results would be plus or minus five percentage points (10.4 percent to 20.7 percent). This underlines the importance of estimating error rates as accurately as possible. If the sample turns out to be too large, unnecessary work will have been done; if the sample proves to be too small, the audit results will not be as accurate and reliable as expected.

In some cases, an auditor may have to decide whether to use a *one-tailed* or a *two-tailed* sampling test. A two-tailed test can identify significant differences in either direction from a designated standard, whereas a one-tailed test will identify differences in only one direction. For example, if repository officials are interested in determining whether the repository’s accuracy level for a particular type of information is significantly better or worse than some standard, a two-tailed test would be appropriate. On the other hand, if the officials are only concerned with whether they are doing worse than the standard, a one-tailed test would be appropriate. The advantage of using a one-tailed test is that, all else being equal, it does not require as many sample cases in order to obtain comparable precision factors and confidence levels.

When an audit is conducted to determine if some sort of standard is being met (for example, there may be a requirement that 95 percent of all records be complete), it is critical that the auditor consider the “power” of the statistical approach utilized. Statistical *power* refers to how likely it is that a given test will identify deviations from a standard. The greater the power of the test, the more likely it will identify deviations from the standard. Power is affected by several factors, but a key factor is the number of cases sampled. The greater the number of cases sampled, the greater the power of a test. In order to calculate the power of a test, an auditor must determine how large

a deviation from the standard has to be in order to be considered important, because the detection of large deviations is obviously much easier than the detection of slight deviations from a standard. The more subtle the effect to be detected, the greater the number of cases that will be required.¹³ (Because of their complexity, sample tables for determining sample sizes for different power levels are not included in this *Guide*.)

¹³For a more detailed discussion regarding statistical power issues, please see: Helena C. Kraemer and Sue Thiemann, *How Many Subjects? Statistical Power Analysis in Research* (New York: Sage Publications, 1987).

Pop. Size	Sample Size for Precision of:						
	±.5%	±1%	±1.5%	±2%	±2.5%	±3%	±4%
3,000		1135	639	396	267	190	110
3,100		1149	643	398	267	190	110
3,300		1175	652	401	269	191	110
3,500		1200	659	404	270	192	110
3,700		1222	666	406	271	192	111
3,900		1243	672	409	272	193	111
4,000		1253	675	410	273	193	111
4,500		1299	688	414	275	194	111
4,700		1315	692	416	275	194	111
5,000		1337	698	418	276	195	112
5,500		1370	707	421	278	196	112
6,000		1400	715	424	279	196	112
6,500		1425	722	426	280	197	112
7,000		1448	727	428	281	197	112
7,500	3700	1468	732	430	282	197	112
8,000	3817	1486	737	432	282	198	112
8,500	3932	1503	741	433	283	198	113
9,000	4031	1517	744	434	283	198	113
9,500	4128	1531	748	435	284	199	113
10,000	4220	1543	751	436	284	199	113
10,500	4306	1555	753	437	285	199	113
11,500	4465	1575	758	439	285	199	113
13,000	4675	1600	764	441	286	200	113
14,500	4856	1621	769	442	287	200	113
15,000	4851	1627	770	443	287	200	113
16,500	5061	1643	774	443	287	200	113
19,000	5274	1665	778	446	288	201	113
20,000	5348	1672	780	446	288	201	113
22,000	5482	1685	783	447	289	201	113
24,000	5595	1696	785	448	289	201	114
26,000	5699	1705	787	448	289	201	114
28,000	5790	1713	789	449	289	201	114

Figure 1
Statistical Sampling Table Excerpt¹⁴
(Sample sizes for sampling attributes for random samples only. Expected rate of occurrence not over 5% or expected rate of occurrence not less than 95%. Confidence level 95% (two-tailed); 97.5% (one-tailed).)

¹⁴ Excerpted from Herbert Arkin, *Handbook of Sampling for Auditing and Accounting*, 3d. ed. (New York: McGraw-Hill Book Co., 1984) pp. 334-335.

Pop. Size	Sample Size for Precision of:						
	±.5%	±1%	±1.5%	±2%	±2.5%	±3%	±4%
30,000	5871	1720	790	449	290	201	114
32,000	5944	1727	791	450	290	202	114
34,000	6010	1732	793	450	290	202	114
36,000	6069	1737	794	451	290	202	114
38,000	6123	1741	795	451	290	202	114
40,000	6173	1745	795	451	290	202	114
45,000	6282	1754	797	452	291	202	114
50,000	6370	1761	799	452	291	202	114
60,000	6508	1771	801	453	291	202	114
70,000	6610	1779	802	453	291	202	114
80,000	6689	1784	803	454	291	202	114
90,000	6752	1789	804	454	291	202	114
100,000	6803	1792	805	454	292	202	114
150,000	6961	1803	807	455	292	203	114
200,000	7043	1809	808	455	292	203	114
250,000	7092	1812	809	455	292	203	114
300,000	7126	1814	809	456	292	203	114
400,000	7169	1817	810	456	292	203	114
500,000	7196	1818	810	456	292	203	114

Figure 1 (Continued)

Pop. Size	Sample Size for Precision of:						
	±5%	±1%	±1.5%	±2%	±2.5%	±3%	±4%
12,000		2496	1254	740	484	340	194
12,500	6274	2517	1259	741	485	341	194
13,000	6398	2537	1264	743	486	341	194
14,000	6631	2573	1273	746	487	342	194
15,000	6847	2605	1281	749	488	342	194
16,000	7050	2633	1288	751	489	343	195
17,000	7236	2659	1294	753	490	343	195
18,000	7411	2682	1299	755	491	344	195
19,000	7575	2704	1304	757	491	344	195
20,000	7730	2721	1309	758	492	344	195
21,000	7874	2741	1313	760	493	344	195
23,000	8141	2772	1320	762	494	345	195
25,000	8377	2799	1326	764	494	345	195
27,000	8592	2823	1331	766	495	346	196
29,000	8783	2843	1336	767	496	346	196
30,000	8873	2851	1338	768	496	346	196
32,000	9041	2869	1342	769	497	346	196
35,000	9264	2892	1346	771	497	347	196
38,000	9462	2909	1351	772	498	347	196
40,000	9581	2920	1353	773	498	347	196
43,000	9745	2937	1356	774	498	347	196
45,000	9843	2944	1358	774	499	348	196
48,000	9980	2958	1361	775	499	348	196
50,000	10063	2963	1362	776	499	348	196
55,000	10250	2981	1366	777	500	348	196
65,000	10552	3006	1371	779	501	348	196
80,000	10884	3033	1376	780	501	349	197
100,000	11189	3056	1381	782	502	349	197
130,000	11487	3077	1385	783	502	349	197
150,000	11623	3085	1387	784	503	349	197
180,000	11775	3098	1389	785	503	350	197
200,000	11852	3101	1391	785	503	350	197
250,000	11994	3111	1393	785	503	350	197
375,000	12189	3124	1395	786	504	350	197
500,000	12289	3132	1396	787	504	350	197

Figure 2
Statistical Sampling Table Excerpt¹⁵
(Sample sizes for sampling attributes for random samples only. Expected rate of occurrence not over 5% or expected rate of occurrence not less than 95%. Confidence level 99% (two-tailed); 99.5% (one-tailed).)

¹⁵ Ibid., p. 356.

Pop. Size	Sample Size for Precision of:							
	±.5%	±1%	±1.5%	±2%	±2.5%	±3%		±4%
6,000			2194	1224	756	507	361	209
6,500			2257	1243	763	510	363	209
7,000			2314	1261	769	513	364	210
7,500			2367	1276	775	516	365	210
8,000			2414	1290	780	518	367	210
8,500			2453	1302	785	520	368	211
9,000			2493	1313	789	522	368	211
9,500			2535	1323	792	523	369	211
10,000			2569	1332	796	525	370	212
10,500			2601	1341	799	526	371	212
11,000			2631	1349	801	527	371	212
11,500			2658	1356	804	528	372	212
12,000			2684	1363	806	529	372	212
12,500			2708	1369	808	530	373	212
13,000			2731	1375	810	531	373	213
13,500			2752	1380	812	532	374	213
14,000		6957	2773	1385	814	533	374	213
14,500		7079	2792	1390	816	533	375	213
15,000		7196	2810	1394	817	534	375	213
16,000		7418	2843	1402	820	535	375	213
17,000		7626	2873	1410	822	536	376	213
18,000		7821	2900	1416	825	537	376	214
19,000		8004	2925	1422	827	538	377	214
20,000		8176	2948	1427	828	539	377	214
22,000		8491	2988	1437	832	540	378	214
24,000		8774	3022	1445	834	541	378	214
26,000		9028	3055	1451	836	542	379	214
28,000		9257	3077	1457	838	543	379	214

Figure 3
Statistical Sampling Table Excerpt¹⁶
(Sample sizes for sampling attributes for random samples only. Expected rate of occurrence not over 10% or expected rate of occurrence not less than 90%. Confidence level 95% (two-tailed); 97.5% (one-tailed).)

¹⁶ Ibid., p. 337.

Pop. Size±.5%	Sample Size for Precision of:						
	±1%	±1.5%	±2%	±2.5%	±3%	±4%	
30,000	9465	3100	1462	840	544	379	215
32,000	9658	3120	1467	842	544	380	215
35,000	9913	3146	1472	843	545	380	215
38,000	10140	3169	1477	845	546	380	215
40,000	10277	3182	1480	846	546	380	215
42,000	10405	3194	1483	847	546	381	215
45,000	10579	3210	1486	848	547	381	215
50,000	10834	3234	1491	850	548	381	215
55,000	11050	3253	1495	851	548	381	215
65,000	11404	3282	1502	853	549	382	215
75,000	11677	3305	1506	854	550	382	215
90,000	11989	3329	1511	856	550	382	216
100,000	12150	3242	1514	857	551	383	216
110,000	12287	3352	1516	858	551	383	216
125,000	12453	3365	1518	859	551	383	216
140,000	12587	3374	1520	859	552	383	216
150,000	12663	3379	1522	859	552	383	216
200,000	12936	3398	1525	861	552	383	216
275,000	13167	3414	1529	862	553	384	216
350,000	13303	3423	1530	862	553	384	216
425,000	13340	3430	1532	863	553	384	216
500,000	13459	3433	1532	863	553	384	216

Figure 3 (Continued)

<i>For Sample Size of:</i>														
<i>and Field Size is:</i>	60		100		200		300		500		1,000		2,000	
	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit
200	6.4%	24.7%	10.5%	21.0%										
300	7.9	25.4	9.8	22.0										
400	7.7	25.7	9.5	22.4	11.7%	19.0%								
500	7.6	25.9	9.3	22.6	11.4	19.4								
1,000	7.3	26.2	9.0	23.1	10.9	20.1	11.8%	18.8%	12.9%	17.4%				
1,500	7.3	26.4	8.9	23.2	10.7	20.3	11.6	19.1	12.5	17.8				
2,000	7.2	26.4	8.8	23.3	10.6	20.4	11.5	19.2	12.4	18.0	13.5%	16.7%		
2,500	7.2	26.4	8.8	23.4	10.6	20.5	11.4	19.3	12.3	18.1	13.3	16.8		
3,000	7.2	26.5	8.8	23.4	10.5	20.5	11.4	19.3	12.2	18.1	13.2	16.9		
3,500	7.2	26.5	8.7	23.4	10.5	20.6	11.3	19.4	12.2	18.2	13.2	17.0		
4,000	7.2	26.5	8.7	23.4	10.5	20.6	11.3	19.4	12.2	18.2	13.1	17.1	13.9%	16.2%
4,500	7.2	26.5	8.7	23.4	10.5	20.6	11.3	19.4	12.2	18.2	13.1	17.1	13.9	16.2
5,000	7.2	26.5	8.7	23.4	10.5	20.6	11.3	19.4	12.1	18.3	13.1	17.1	13.8	16.3
6,000	7.1	26.5	8.7	23.5	10.4	20.6	11.3	19.4	12.1	18.3	13.0	17.2	13.7	16.3
7,000	7.1	26.5	8.7	23.5	10.4	20.6	11.2	19.5	12.1	18.3	13.0	17.2	13.7	16.4
8,000	7.1	26.5	8.7	23.5	10.4	20.7	11.2	19.5	12.1	18.3	13.0	17.2	13.7	16.4
9,000	7.1	26.5	8.7	23.5	10.4	20.7	11.2	19.5	12.1	18.3	13.0	17.2	13.6	16.5
10,000	7.1	26.5	8.7	23.5	10.4	20.7	11.2	19.5	12.1	18.4	13.0	17.3	13.6	16.5
15,000	7.1	26.6	8.7	23.5	10.4	20.7	11.2	19.5	12.0	18.4	12.9	17.3	13.6	16.5
20,000	7.1	26.6	8.7	23.5	10.4	20.7	11.2	19.5	12.0	18.4	12.9	17.3	13.5	16.5
25,000	7.1	26.6	8.7	23.5	10.4	20.7	11.2	19.5	12.0	18.4	12.9	17.3	13.5	16.6
50,000	7.1	26.6	8.7	23.5	10.4	20.7	11.2	19.5	12.0	18.4	12.9	17.4	13.5	16.6
100,000	7.1	26.6	8.7	23.5	10.4	20.7	11.2	19.5	12.0	18.4	12.9	17.4	13.5	16.6

Figure 4
Statistical Sampling Table Excerpt¹⁷
 (Sample reliability for relative frequencies for random samples only.
 Rate of occurrence in sample is 15%. Confidence level is 95%.)

¹⁷ Excerpted from Henry P. Hill and others, *Sampling in Auditing* (Huntington, N.Y.: Robert E. Kreiger Publishing Co., 1979).

C. Finalizing the Audit Methodology

• Goal

Some of the decisions to make and tasks to accomplish in developing an audit methodology are discussed in earlier sections of the *Guide*. This section discusses other tasks that are necessary in finalizing the audit approach, structuring the tools for conducting the audit, and gathering and evaluating the information that will support the audit findings and recommendations. These tasks include (1) developing data collection forms for record validations; (2) developing audit questionnaires; (3) creating an audit database; and (4) preparing an audit manual.

• Procedures

— Develop Data Collection Forms

Data collection forms used in auditing sample records should be structured to provide spaces for the auditor to record the results of record validations in such a way as to simplify the entry of audit results into an audit database for analysis and report generation. Additionally, if criminal history records are to be corrected on the basis of the audit, the data collection forms should provide spaces for recording corrected information or, at a minimum, spaces for indicating which data elements need to be corrected. A suggested approach is to structure data collection forms, as well as data analysis and audit findings, on the basis of reportable events to be targeted by the audit, that is, agency processing steps or decisions in the criminal justice process that are required to be reported to the repository. As indicated earlier, a list of reportable events can be compiled from applicable reporting laws and regulations. Such a list might include the following (or, for particular audits, only some of the following):

- Arrest information

- Release by police without charging
- Initial court appearance
- Bail information
- Pretrial and post-trial detention
- Misdemeanor court disposition information
- Felony court disposition information
- Appellate court information
- Release pending appeal
- Probation information
- Confinement information
- Parole information

The data collection form should include spaces for recording audit results for all of the principal processing steps or decisions required to be reported to the repository, from arrest or other case initiation through final release from confinement or supervision. Other events, such as executive clemency or court-ordered changes in sentences, may be infrequent enough to be handled on an *ad hoc* basis and may not merit inclusion on the data collection form.

When the list of reportable events to be targeted by the audit has been finalized, data collection forms can be structured to provide spaces for indicating an audit finding concerning the completeness and accuracy of each reportable data element within each reportable event and an overall audit finding for the reportable event. This will enable the auditor to record a finding as to whether the event was reported fully and accurately and, if not, to indicate which data elements were inaccurate or missing. This simplifies entry of audit results into an audit database and provides an easy and useful way to aggregate audit results and display them in the audit report.

A data collection form used to validate sample records in an audit of a State central criminal history database is included as Appendix I. Since it was used in a comprehensive audit performed on a complete-case basis, the multiple-page form encompasses all types of case

information required to be reported to the repository by the State's criminal history record law. For ease of reference, pages 1 and 2 of the form appear as Figure 5. On these pages, spaces are provided for the auditor to record notations or codes representing audit findings for reportable events (arrest, court data, etc.) and for data elements within reportable events. The codes are listed at the bottom of the pages. A notation of "C/A" indicates that an item of information on a sample record was found by comparison with agency source documents to be complete and accurate. "M" indicates that the data element was missing from the sample record. "E" indicates that the information was found to be inaccurate in some respect, and "INC" means that it was incompletely reported. "N/A" means not applicable and "NSD" means that no agency source document could be located to validate a particular data element or reportable event. Finally, "LE" means "linkage error," indicating that a particular item of information was reported to the repository but did not appear on the sample criminal history record because of a tracking number error or other error or omission.

As noted, the form includes spaces for validating the completeness and accuracy of individual data elements, as well as of reportable events. For example, if all of the information required to be reported for a particular reportable event were found to be completely and accurately shown on the sample record, the auditor would record "C/A" for each included data element and "C/A" for the reportable event. If, on the other hand, the auditor found that a court failed to report particular charge information but accurately reported all other required information, he would mark the charge information "M" and would mark the reportable event ("court data") "INC."

Electronic Editor's Note:

Figure 5, the Sample Data Collection Form Excerpt, (pp. 24-25)

is not available electronically.

In the State in which this audit was conducted, some agencies report information to the repository by means of local computer systems. For this reason, the data collection form includes spaces for indicating whether particular errors or omissions were caused by these systems. The form also includes spaces for recording agency case numbers, agency identification numbers and offender identification numbers. Although these numbers are not always shown on criminal history records, they often are entered into criminal history databases and are useful in searching the databases, in locating agency case files and in determining whether particular information not shown on sample records was reported but not successfully linked. Finally, the form includes spaces for recording the dates on which reportable events occurred. These dates can be used to determine whether the events were reported in a timely fashion.

As mentioned earlier, the audit in which the form in Appendix I was used was conducted on a jurisdictional or complete-case basis; thus, this multiple-page data collection form provides spaces for validating *all* of the information about particular sample cases reported (or not reported) by all of the criminal justice agencies involved in processing the cases. In addition, the list of reportable data elements conforms to the format of the criminal history record, since this particular audit approach involved (1) validating all of the information shown on or missing from the sample criminal history records; and (2) making determinations as to whether errors or omissions resulted from reporting deficiencies at the local agency level or from data entry errors at the repository.

Figure 6 sets out an example of a data collection form developed for use in an audit that differs significantly in approach from the one discussed above. This form was developed for use in a program of continuing audits of local criminal

justice agencies conducted by a State central repository. The audit approach calls for most of the scheduled audits to be conducted on an individual agency basis. Thus, the data collection forms were structured separately for individual agencies: arresting agencies, State's attorneys, courts and custodial agencies. Figure 6 is the form used for auditing arresting agencies. Since data entry procedures at this particular repository are audited yearly by an independent State agency, the audit approach for the local agency audit program provides for auditing the completeness and accuracy of information on fingerprint cards and disposition reporting forms submitted to the repository; that is, for auditing the incidence and accuracy of reporting by local agencies, but not the accuracy of data entry at the repository. Thus, the structure of the data collection forms follows the format of the reporting documents used by local agencies.

Finally, because this State intends to use the data collection forms for correcting erroneous records, the forms provide spaces both for indicating whether particular data elements were reported fully and accurately (the small blocks in the upper left corners of the data field blocks) and larger spaces for writing in corrected information as necessary (the titled data field blocks). Like the multiple-page form set out at Appendix I, this form uses code notations (set out at the bottom of the form) to indicate audit findings and provides spaces for recording audit findings at both the data element level and the reportable event level.

Other data collection forms developed for this local agency audit program are provided in Appendix II. These forms and the two discussed above are examples of forms developed for particular States for use in particular audit programs. While they are useful as examples, it should be stressed that data collection forms must be tailored to the criminal history record format, reporting procedures and criminal justice case

processing procedures of particular jurisdictions, as well as to the audit methodology to be employed.

— *Develop Audit Questionnaires*

Questionnaires should be developed to use in conducting interviews with agency personnel during audit site visits to assess the adequacy of reporting procedures and other procedures that affect data quality. These questionnaires can ensure that audit interviews are conducted in an orderly fashion and that all relevant issues are addressed. Like the data collection forms, audit questionnaires should be structured to conform to the particular audit approach being used and to the requirements of applicable laws, regulations and reporting procedures. Questions should be included to determine what types of files the audited agency maintains, whether agency officials and personnel understand applicable legal requirements and their reporting duties, and what procedures the agency employs to ensure full and accurate reporting to the repository. The questionnaire forms also should include spaces for the auditor to indicate whether the agency is in compliance with legal requirements, and spaces for recording comments concerning agency procedures that are not in compliance with applicable requirements, including suggestions for remedying such deficiencies. These notations and comments can be used in preparing audit reports (see Part V).

CJIS Audit Data Collection Form

Arrest Information

Agency Audited _____

Audit Case No. _____ Auditor _____ Date _____

Subject Name _____

DCN _____ PCN _____

<input type="checkbox"/> Summary Audit Finding *	SUBJECT IDENTIFICATION INFORMATION <i>Enter Corrected Information as Appropriate</i>										
	Subject Name	LAST	FIRST	MIDDLE		Birthdate	Month	Day	Year		
	Also Known As - AKA					Month	Day	Year			
	Sex	Race	POB	Hair Color	Skin Tone	Height	Weight	Eyes	Photo Taken <input type="checkbox"/> Yes <input type="checkbox"/> No		
	Scars, Marks, Tattoos		Misc. Number	Social Security Number			Driver's Lic. Number			State	
	Agency's Off. ID Number			Agency's Case Number			Month	Day	Year		
<input type="checkbox"/> Summary Audit Finding *	CHARGE AND DISPOSITION INFORMATION <i>Enter Corrected Information as Appropriate</i>										
	Charge	Audit Finding*	Statute Citation	CSA	Class	Offense Description	Warrant Type	County of Issue	Warrant Court Case No.	Disposition	
	1										
	2										
	3										
	4										
<input type="checkbox"/> Summary Audit Finding *	OTHER INFORMATION <i>Enter Corrected Information as Appropriate</i>										
	Date of Arrest Month Day Year		Date of Offense Month Day Year		County of Prosecution		Juvenile Pros. as Adult <input type="checkbox"/> By Law <input type="checkbox"/> Ct. Order		Post Sentence Fingerprints <input type="checkbox"/> Yes <input type="checkbox"/> No		Inquire Only <input type="checkbox"/> Yes <input type="checkbox"/> No
	Prints signed by officer <input type="checkbox"/> Yes <input type="checkbox"/> No			Prints signed by subject <input type="checkbox"/> Yes <input type="checkbox"/> No			Officer ID noted <input type="checkbox"/> Yes <input type="checkbox"/> No			Agency ORI	
	Agency Name			Comments							

REPORTABLE EVENT AUDIT FINDING*

*Audit Findings:
 A = Accurate and Complete; E = Erroneous; I = Incomplete; M = Missing; NA = Not Applicable; NSD = No Source Document

Appendix III sets out an audit questionnaire developed for use in the local agency audit program referred to above. Like the data collection forms discussed earlier, this questionnaire reflects specific legal requirements and reporting procedures in the State in which it is used. In addition, it includes questions on areas of record management other than data quality, including dissemination, security, personnel training and record subject access/review. The form does, however, illustrate the types of questions that should be included concerning agency file maintenance and reporting procedures. It also shows how a questionnaire form can be structured so as to facilitate the preparation of audit reports. All of the questions on the form that have “Yes/No” blocks in the left margin are based upon specific legal requirements in the State. This means that any “No” block that is marked by the auditor indicates some respect in which the audited agency is not in compliance with a reporting or recordhandling requirement based upon Federal or State law. Each such question has a space for comments in which the auditor can set out specific information as to the reasons for the finding of noncompliance and can suggest ways in which compliance can be achieved. This information can later be incorporated into the audit report as described in Section V of this *Guide*. The questionnaire also includes spaces for recording identifying information about the audited agency, the names and titles of agency officials and records personnel, and the names and telephone numbers of persons to be contacted for follow-up questions concerning the audit.

— *Create an Audit Database*

For particular audits, the number of sample records involved and the scope of the review may be such that analysis of audit data and preparation of tables, charts and graphs for inclusion in the audit report or reports can be accomplished manually. At

best, however, this is a tedious process and if the audit is extensive or part of a series of continuing audits, manual analysis of audit data may be impossible. For this reason, arrangements should be made to store audit data in a computer, if possible. Spreadsheet and database management software packages are available that can greatly simplify the entry and storage of sample case information and can make such information easily retrievable for follow-up audit tasks and for analysis and report generation purposes. If the audit is part of a series of continuing local agency audits, computer storage of audit data facilitates the aggregation of such data over a period of time for management purposes, as well as for generating periodic reports.

In addition to information about sample cases and audit results, the auditor can store miscellaneous agency identification numbers and case processing numbers that can simplify the production of lists of key numbers for use in locating case files at audited agencies. The auditor can use these numbers to pull files during the audit or provide them to the agency in advance so that case files can be pulled prior to the audit and made conveniently available to the auditor. These numbers can also be useful if follow-up questions arise that need to be referred back to audited agencies for response.

Audit data should be entered in the computer database in such a way as to provide easy retrieval of information reflecting the results of record validation reviews. This can be facilitated by using notations or codes such as those discussed earlier — C/A, M, E, INC, LE, etc. In addition, if necessary for report generation or management purposes, additional symbols or codes can be used to facilitate the entry and analysis of information about specific types of errors or omissions. For example, if the audit reveals a pattern of occurrence of particular types of errors in reporting particular data elements, such as using an erroneous

disposition code or sentence code in reporting court disposition information, the auditor might devise a special error code or symbol, such as “E1,” to store this information. Use of such error codes makes it possible for these particular types of errors to be aggregated and reflected in the tables and narrative of the audit report.

Using a computer to store audit data also makes it easy to enter the results recorded on audit questionnaires concerning agency compliance with particular legal requirements, such as reporting deadlines. This simplifies the generation of individual audit reports and, for ongoing local agency audit programs, the generation of summary reports based on particular legal requirements, particular types of agencies, particular geographic areas or other such bases for aggregating and analyzing audit results. Such cumulative data can be a useful management tool for monitoring local agency compliance with particular legal requirements. In addition, although the record validation component of individual agency audits may involve too few records to be statistically significant, record validation results cumulated over a period of time can provide a useful and reliable assessment of data quality.

— *Prepare an Audit Manual*

Once the audit methodology has been finalized, including the structuring of data collection forms and questionnaires, it is recommended that an audit manual be prepared describing the audit approach in detail (including methods for selecting sample cases) and setting out specific instructions for such tasks as completing the data collection forms, administering the audit questionnaires and entering audit results in the audit database. The manual should also summarize the pre-audit procedures set out in part D of this section and the procedures set out in part E for conducting on-site audits. As

experience is gained in conducting audits, the manual can be revised and augmented as necessary. In particular, instructions can be added concerning the types of source documents found to be most appropriate for validating various types of sample case information. Sample copies of such source documents can be included as an appendix to the manual to assist other auditors in locating them.

A manual of this type will be especially helpful in conducting a continuing local agency audit program, particularly if it is contemplated that additional or replacement auditors will be engaged as the audit program progresses.

D. Completing Pre-Audit Planning

• Goal

This section of the *Guide* describes other tasks that must be completed prior to beginning on-site audits of selected agencies. It assumes that an audit methodology (including data collection forms, audit questionnaires and sample record selection procedures) has been finalized and that some or all of the agencies to be audited have been selected. The tasks set out here are applicable to site visits undertaken as part of a comprehensive audit of the repository database, as well as to multiple audits undertaken as part of an ongoing local agency audit program. These tasks include (1) developing an audit schedule; (2) contacting agencies to be audited; and (3) preparing audit folders.

• Procedures

— *Develop an Audit Schedule*

A preliminary audit schedule should be developed, based upon considerations outlined in preceding sections of the *Guide* and upon such additional factors as the number of records to be validated, the estimated time needed to review and, if necessary, copy source documents,

the probable ease or difficulty of locating and pulling case files, the availability of auditors, necessary travel time and known scheduling conflicts. The schedule should reflect the number of audits to be conducted during the scheduled period and should include proposed dates and times for the audits, or at least for those planned for the first few weeks or months. Planning as far ahead as possible permits auditors to schedule their time for conducting audits and for other such activities as report writing, and also gives the audited agencies more advance notice so that they can ensure the availability of agency personnel and make other necessary arrangements to facilitate the audit.

It should be assumed that the preliminary schedule will require revision after initial contact with agencies selected for audit and that the schedule will require continued monitoring and possible revision due to scheduling conflicts involving auditors or agency officials or due to other unforeseen problems. It is advisable to schedule some flexibility into the projected timetable and to have alternate agencies in mind in the event that audits for scheduled agencies need to be rescheduled.

— *Contact Agencies to be Audited*

INITIAL CONTACTS. As part of pre-audit planning, efforts should be made to enlist the endorsement and cooperation of high-ranking State and local criminal justice officials who can help to obtain the cooperation of the agencies to be audited. Such officials as the Attorney General, the Commissioner of Public Safety, the Commissioner of Corrections, and the Chief Justice of the State's highest court or the State Court Administrator can help pave the way for cooperation by agency officials in their respective departments of government, resulting in savings in audit time and costs. Most criminal justice officials have extremely heavy workloads and many of them may be reluctant to find time to participate in an audit. In addition, they may be

skeptical about the reasons for the audit and uneasy about the outcome and thus not inclined to cooperate. It can be helpful to have a high-ranking official in their department or branch contact them to explain the reasons for the audit and to urge them to cooperate.

Officials of agencies selected for audit should be contacted by the auditors, by telephone or mail, well in advance of the proposed audit dates to confirm the feasibility of the dates and to briefly explain the scope of the audit and the nature of the assistance the agency will be asked to provide. In addition, the auditor should raise any necessary questions about such things as the agency's recordkeeping practices, accessibility of files and the availability of photocopy machines.

AUDIT NOTICE LETTER. Once a scheduled date is agreed upon, the agency should be sent a formal audit notice letter confirming the date and advising in some detail of the legal authority for the audits; the scope of the planned review of agency activities and records; and applicable legal reporting and recordkeeping requirements. The letter also should advise the agency of any other audit requirements, such as the need to interview particular agency officials, the necessity for working space for the auditors and the necessity for making arrangements to obtain copies of source documents and other agency files.

An audit notice letter developed for use in the local agency audit program referred to earlier is provided in Appendix IV. The letter includes a pre-audit questionnaire form that agencies are asked to complete and return to the auditors. This form requests information concerning the size of the population served by the agency, case processing volumes, the types of files and source documents maintained, how such files are organized and numbered, and whether the agency has written policies governing record preparation and handling and reporting to the

repository. Information provided in response to questionnaires such as these can help the auditor make final plans for the audit and perform any additional pre-audit work that may be indicated.

For example, the pre-audit questionnaire response may indicate that some of the reporting forms submitted to the repository (arrest fingerprint cards, for example) are essentially original source documents; that is, that the information on them is original rather than obtained from a previously completed document. This may indicate that the auditor will not need to plan for validation of these types of sample records. As another example, the questionnaire response may confirm that a sheriff's office is both an arresting agency and a pre-trial or post-trial detention facility, necessitating a broader audit than originally envisioned. Information such as this can help the auditor ensure that enough time is scheduled for the site visit and that appropriate sample records, data collection forms and audit questionnaires are taken along.

Of necessity, the questions appropriate for inclusion in such pre-audit questionnaires will vary depending upon the type of agency to be audited. It is probable that a separate form questionnaire will need to be developed for each type of agency included within the scope of the audit — arresting agencies, courts, prosecutors, etc.

— Prepare Audit Folders

When all sample records (criminal history transcripts, fingerprint cards, disposition reporting forms, etc.) and other relevant documents for a particular agency have been selected and obtained, audit folders for the agency should be prepared.

CASE FOLDERS. A numbered folder should be prepared for each sample record to be validated during the site visit and a copy of all case documents, together with a data collection form, should be placed in

the folder. If, during the audit, copies of agency source documents are obtained for record correction or audit documentation purposes, these copies should be placed in the sample case folders also.

AGENCY FOLDERS. A larger agency folder should be prepared to store all of the documents relating to the audit of a particular agency. This folder should contain all of the sample case folders, copies of the audit notice letter and other correspondence, appropriate audit questionnaires, copies of agency policy statements and other materials that may be necessary or useful during the audit, such as copies of applicable laws and regulations and reporting form instruction sheets or code tables. The folder should also contain any other relevant information about the agency available to the auditor. For example, if the repository logs the date of receipt of reported information, it should be possible to determine prior to the site visit whether all of the sample reportable events were submitted in a timely manner or perhaps to obtain other information about timeliness of reporting and overall data quality levels derived from the repository's systematic audit program. Any available information of this type should be included in the agency audit folder for use in interviewing agency personnel during the audit.

E. Conducting the Audits

• Goal

This section discusses the major tasks involved in performing on-site data quality audits. They are (1) conducting an entry interview; (2) touring the agency's recordkeeping operations; (3) validating sample records; (4) locating appropriate files; (5) reviewing "extra-agency" papers; (6) obtaining copies of audit documents; (7) selecting sample cases for "reverse audit"; and (8) conducting an exit interview.

• Procedures

— Conduct an Entry Interview

At the start of the on-site audit, the auditor should schedule a conference with agency officials and record personnel to explain the legal basis, purpose, scope and approach of the audit. If some of this information already has been provided in the audit notice letter, only a brief summary should be necessary. The auditor should also review requirements for such things as work space, a tour of agency recordkeeping operations, assistance in locating files and assistance in obtaining copies of documents. Arrangements should be made for obtaining copies of booking sheets, docket books or whatever documents are necessary to identify a specified number of reportable events for reverse auditing as a further check on reporting, if this is to be done (see the section on *Select Cases for Reverse Audit*, Page 32). If arrangements have not been made in advance for pulling sample case files, the sample case numbers and other identifying information should be provided to agency personnel at this point to enable them to begin locating and pulling the files, if this is necessary to speed the audit process.

At the entry conference, the auditor should summarize the data quality and reporting laws and regulations applicable to the agency and should review any specific reporting requirements that may not be entirely clear to agency personnel. Any information the auditor has obtained in advance about the agency's reporting performance or the quality of information reported by the agency should be reviewed and any data quality problems already identified by the auditor should be discussed. If the necessary agency personnel are present at the conference, this may be the appropriate time to complete the audit questionnaire.

It is likely that the auditor will need to explain to at least some agency personnel the precise

reporting requirements applicable to them and the reasons for requiring the reporting of particular items of information in particular ways. For example, arresting agencies may not be fully aware of their duty to fingerprint persons already in custody who are charged in new and separate cases or they may not understand the critical importance of assigning and reporting case tracking numbers. Prosecutors may not understand the importance of reporting cases they decline to prosecute or reporting information about charge modifications. Court personnel may not understand the importance of reporting a disposition and sentence, if any, for each charge, the necessity of using designated disposition codes and sentence codes, or the importance of obtaining the fingerprints of convicted persons who have not already been fingerprinted. For these reasons, the auditor may find that, to agency personnel, the audit is as much instructional as it is an assessment of their performance. Care should be taken to have sufficient copies of applicable laws and regulations, instruction forms and code tables available in case agency personnel do not have current copies.

Finally, the auditor should explain that the agency will be afforded an opportunity to comment on audit findings before they are finalized, if this is to be the case. He should also explain how the report will be utilized and distributed, such as whether it will be made available to the public, the State legislature or the Governor.

— Tour the Agency's Record Operations

At the conclusion of the entry interview, the auditor should request a guided tour of the agency's record creation and storage areas, and areas where computer terminals and other equipment are located. During this tour, the auditor should confirm information provided during the entry interview and in response to the audit questionnaire and should resolve any remaining questions about the

agency's procedures for recording and storing criminal history record information and reporting to the repository. It may be appropriate to observe record personnel at work or to question some of them about their understanding of their duties. The auditor may wish to review sample documents being processed at the time of the audit and note the dates of occurrence of reportable events to determine whether there are data entry backlogs or reporting delays. Finally, this tour of agency procedures and examination of agency files will enable the auditor to confirm whether validation of sample information is necessary and to determine which files and papers are the appropriate original source documents for record validation purposes.

— Validate Sample Records

If it is appropriate to validate sample records by comparison with agency source documents, the auditor should make arrangements to have the sample case files located and brought to a convenient work area (if this has not already been done), or to have direct access to the necessary files (if this is more feasible). It is usually helpful to have agency personnel available during the record comparison process to answer questions that may arise and to help locate and interpret source documents or entries.

— Locate Appropriate Files

The purpose of the record validation process is to determine from official agency source documents what actually happened at a particular processing stage in a sample case and to determine whether the processing agency fully and accurately reported the required information about the event to the repository. In some audits, an additional purpose may be to determine whether the repository itself accurately entered the information and recorded it on the appropriate criminal history record.

For record validation purposes, the auditor will want to locate the most official and reliable record of the event maintained by the agency. Usually, this will be the first record created, that is, the "original source" record of the event. These records may be separate pieces of paper, such as court orders, documents completed by court clerks in the courtroom, fingerprint cards or indictment forms; or they may be ledgers, such as arrest booking sheets or court docket books. They may be partly both. The auditor will need to determine which records, files or ledgers are the most reliable recordings of the sampled reportable events.

As noted earlier, the auditor may find that some of the information reported to the repository is reported in essentially original form and need not be verified by reference to any other record. For example, sometimes the subject identification information, arrest event information and charge information on an arrest fingerprint card is original information — that is, it is initially recorded directly on the fingerprint card rather than copied from some other document. In some agencies, however, some or all such information may be taken from other, earlier records, such as arrest booking sheets or incident reports. The auditor will need to understand exactly how case processing and record creation takes place in the agency to determine whether validation is appropriate and, if so, to determine which documents are the most reliable records for validation purposes.

— Review Extra-agency Papers

In addition to providing a means of validating information reported by the audited agency, case files maintained by the agency may include copies of records created by other agencies involved in processing the sample cases. If the audit is being conducted on a jurisdiction or complete-case basis (that is, if entire cases are being audited in all of the agencies involved in processing the

cases), these extra-agency copies can help the auditor compile complete lists of *all* of the processing steps that occurred in particular cases and can even be used to validate reported information about some of these other reportable events. For example, case files maintained by trial courts often contain copies of source documents forwarded by other agencies, such as police arrest reports and statements of charges, arraignment documents, bail orders, pretrial commitment or release orders and charging documents. If a particular case resulted in a conviction and a sentence of imprisonment, the trial court case jacket may contain copies of correctional reception or release documents, probation or parole documents, or at least notations indicating whether these events occurred. If the case was appealed, a copy of the notice of appeal and possibly a notation of the outcome of the appeal should be in the trial court's case file. If the case began by indictment and summons rather than by arrest, this should be evident from the court file. Use of such documents as these can save time by making it unnecessary to spend as much time validating records in other agencies. For this reason, it is usually a good idea in complete-case audits to begin the audit at the trial court of the audited jurisdiction and then to audit other agencies as necessary.

— *Obtain Copies of Audit Documents*

At a minimum, the auditor should obtain copies of all source documents relied upon to conclude that reported information is missing, erroneous or incomplete. These copies can be used to clear up questions that may arise later and can be the basis for correcting repository records. If feasible, it is a good idea to obtain copies of all source documents used in the audit, even if the audited information is found to be accurate and complete. Questions may arise later concerning exactly what happened in particular cases and source document copies may provide

the answer and preclude the necessity for follow-up telephone calls or even follow-up site visits.

— *Select Cases for Reverse Audit*

If the audit includes this additional activity, arrangements should be made to select a number of recent reportable events from the agency's files as a "reverse audit" of compliance with reporting requirements. Appropriate reviews can be undertaken later to determine whether all of the events were reported to the repository in a timely manner. For example, as part of an audit of a police agency, a manageable number of recent fingerprintable arrests can be selected at random from the agency's booking sheets or chronological arrest logs and enough information about the arrests can be recorded to determine later whether or not they were reported to the repository. In addition, it may be possible to identify a few cases in which arrested persons were released without being charged (after the arrests were reported to the repository) and to determine, at the agency or at the repository, whether these events were reported. If the agency maintains a chronological file, such as an arrest log, that contains enough information to enable the auditor to identify appropriate reportable events and to make inquiries at the repository to determine whether or not the events were reported, it may be sufficient to obtain copies of several pages of the log or docket. If this is not possible, it will be necessary to copy the relevant case information from the agency's files.

The auditor might also explore the feasibility of making arrangements to obtain copies of logs, dockets or case processing lists or totals on a continuing basis as an ongoing check of agency compliance with reporting requirements and to provide a means of systematic monitoring of the completeness of the repository database. As discussed in an earlier section of the *Guide*, this method of systematic auditing can be a valuable

management tool and can provide an accurate means of gauging data quality.

— *Conduct an Exit Interview*

When the audit is completed, the auditor should conduct an exit interview with agency officials to review the audit and to advise them of any respects in which it is apparent that the agency is or is not in compliance with legal requirements. The auditor can provide a preliminary review of the results of the record validation process and can point out areas of apparent deficiency and suggest ways to remedy them. Discussing preliminary audit findings in this way gives agency officials an early opportunity to take issue with audit findings, if they desire, or to ask questions about what can be done to be in compliance. This should reduce the likelihood of later questions or controversy about audit findings or recommendations and should facilitate review and final approval of the audit report.

If the audit has revealed serious deficiencies in agency procedures or misunderstandings concerning legal requirements that the auditor cannot resolve, it may be necessary to schedule on-site training sessions by repository field personnel or to make arrangements for agency personnel to attend training sessions at the repository or elsewhere. These arrangements can be discussed during the exit conference. Finally, arrangements should be completed for any necessary additional assistance by the agency, such as forwarding copies of source documents or providing information about cases that require follow-up investigation.

Part V

Preparing Audit Reports

• Goal

Upon completion of an audit, a report should be prepared setting forth audit results and the auditor's conclusions and recommendations. The report usually should include (1) a description of the recordhandling and reporting procedures of the audited agency; (2) a presentation of audit findings; and (3) recommendations made by the auditors. This section of the *Guide* discusses these aspects of report preparation. It also suggests ways to simplify the preparation of audit reports in ongoing local agency audit programs that require the preparation of multiple reports.

• Procedures

— Describe Agency Procedures

The report should describe the procedures used by the audited agency to record case processing information, the types of criminal history record files it maintains, and the procedures it uses to report information to the repository. Recordhandling and reporting procedures should be described in enough detail to enable the report reader to understand the audit findings and the auditor's recommendations. The level of detail necessary in a particular report will depend upon the type of audit undertaken, the auditor's findings and the nature and scope of the recommendations. For example, if the audit results indicate that a particular agency is reporting completely and accurately in a high percentage of cases and the auditor has no recommendations for changes in policies or procedures, the description of agency procedures can be brief. If, however, audit results are poor for a particular agency, the auditor will need to describe and

analyze the agency's reporting procedures in some detail in order to explain the problems that caused poor reporting and the reasons for recommended procedure changes. If the audit is undertaken to assess data quality levels at the repository and includes site audits of selected reporting agencies, the audit report probably will need to describe the repository's system configuration, databases, data entry procedures, systematic data quality maintenance procedures and system outputs in some detail and will also need to include descriptions of reporting agency procedures, as suggested above.

— Present Audit Findings

Audit findings should be presented both in narrative and graphic form. If audit information is stored in a computer in the manner suggested earlier in this *Guide*, it should be relatively easy to generate audit statistics and to display them in a variety of tables, charts and graphs so as to make the audit results easy to understand. Such graphic representations can display audit results by agency, by reportable event, by year or other timeframe or in other ways, depending on the nature of the audit and audit results. If, as suggested earlier, data collection forms are structured on the basis of reportable events (arrest data, bail data, trial court data, etc.) and audit results are organized and stored in that manner, it should be relatively simple to present and analyze audit results in this manner. Because each reportable event generally represents a separate decision or step in the criminal justice process that should be reported by the agency responsible for the action, the report can focus on these distinct types of information

and the reporting procedures used by the agency, and can relate deficiencies and recommendations directly to audit results. As recommended earlier, data collection forms and audit data storage procedures also can be structured in a way that makes it possible to analyze and display audit results on the basis of particular data fields, particular types of information within reportable events (for example, subject identification, arrest charge, court charge and count information), or particular types of errors.

In this regard, even though some errors found in the audit may appear to be trivial while others are more serious, it is recommended that all errors or omissions be noted in record validation audits and included in overall audit statistics. Although a particular error may seem immaterial in the context of the record on which it appears, it may well have resulted from lax data entry or reporting procedures that could cause serious errors. It may be appropriate, however, for the audit report to distinguish between serious and nonserious errors in some respects. For example, errors in subject identification information may be categorized on the basis of whether specific errors would cause name search failures, and errors in charge or disposition information may be categorized on the basis of whether they would cause a particular record to be substantively misinterpreted.

— Set Out Recommendations

Where significant deficiencies are documented by the audit, the audit report should set out recommendations for remedying the deficiencies. Such recommendations may include, among others, suggested changes in agency

procedures, implementation of new procedures or acquisition of additional equipment or personnel. As indicated earlier, the recommendations should be related as directly as possible to specific audit results and an analysis of agency procedures. To assist the agency in formulating plans for implementing the audit recommendations, they should be ranked in order of importance. It is usually helpful to the reader if major findings and recommendations are set out in an executive summary or overview section of the report.

— *Prepare Multiple Reports*

If the audits are undertaken as part of a continuing program, such as a local agency audit program, preparing audit reports can become a tedious task that consumes a great deal of time that could be more constructively spent performing additional audits. Since audit offices are invariably understaffed, time saved in report preparation can be an important factor in the overall efficiency of the program. For this reason, it is recommended that the preparation of audit reports in continuing audit programs be planned so as to utilize standard language and forms to the extent possible.

For example, a variety of form cover letters and form paragraphs setting out stock findings and recommendations can be prepared for inclusion at appropriate places in audit reports. These form paragraphs can: (1) summarize applicable legal requirements, such as reporting time limits; (2) provide a standard way of presenting particular audit findings, with blank spaces to be completed as appropriate; and (3) set out various types of agency actions or procedures necessary to achieve compliance with specific requirements. As experience is gained in a particular audit program, these boiler-plate paragraphs, letters and forms can be refined and augmented to be applicable to virtually all audit situations encountered. It is not difficult to enter such standard

language and forms into a computer and to establish procedures for retrieving particular materials as necessary to structure individual audit reports.

Another way of saving time in report preparation is to use audit questionnaires completed during the audit as part of the audit report. It was suggested earlier that such questionnaires be prepared and utilized and that they be structured to provide spaces for indicating ways in which an audited agency is or is not in compliance with particular legal requirements, as well as spaces for comments by the auditor. If care is taken to ensure that auditors' comments entered on such questionnaires are legible, understandable and material, the questionnaires can be made available to the audited agency along with the report. In such cases, the audit report, generated as suggested above, can be keyed to the order of the questions on the questionnaire. Since the auditor will have discussed the audit questionnaire and other audit results with agency officials during the exit interview at the conclusion of the site visit, there should be no surprise conclusions or recommendations. Thus, the type of brief, direct report suggested here should suffice in all cases except perhaps in audits of agencies that have particularly serious or unusual deficiencies, in which case major portions of the audit reports may need to be written with original language, tailored specifically to those agencies and their problems.

Appendices

- I Sample Audit Data Collection Form — Jurisdictional Basis
- II Sample Audit Data Collection Forms — Local Agency Basis
 - State’s Attorney Disposition
 - Court Initiation and Disposition
 - Custodial Receipt/Status Change
- III Sample Audit Questionnaire
- IV Sample Audit Notice Letter

Electronic Editor's Note:

Appendix I, The Sample Audit Data Collection Form, (pp. 37-43)

is not available electronically.

Appendix II

Sample Audit Data Collection Forms

Local Agency Basis

- ***State's Attorney Disposition***
- ***Court Initiation and Disposition***
- ***Custodial Receipt/Status Change***

CJIS Audit Data Collection Form
State's Attorney Disposition

Agency Audited _____

Audit Case No. _____ Auditor _____ Date _____

Subject Name _____

DCN _____ PCN _____

<input type="checkbox"/> Summary Audit Finding *	CHARGE AND DISPOSITION INFORMATION <i>Enter Corrected Information as Appropriate</i>
--	--

Charge	Audit Finding*	Statute Citation	CSA	Class	Offense Description	SA Disposition	Disposition Date		
							Mo.	Day	Year
1									

COMMENTS

2									
---	--	--	--	--	--	--	--	--	--

COMMENTS

3									
---	--	--	--	--	--	--	--	--	--

COMMENTS

<input type="checkbox"/> Summary Audit Finding *	AGENCY IDENTIFICATION INFORMATION <i>Enter Corrected Information as Appropriate</i>
--	---

Form Signed <input type="checkbox"/> Yes <input type="checkbox"/> No	Agency ORI	Agency Name
---	------------	-------------

REPORTABLE EVENT AUDIT FINDING*

*Audit Findings:
 A = Accurate and Complete; E = Erroneous; I = Incomplete; M = Missing; NA = Not Applicable; NSD = No Source Document

CJIS Audit Data Collection Form Court Initiation and Disposition

Agency Audited _____ Date _____

Audit Case No. _____ Auditor _____

Subject Name _____

DCN _____ PCN _____

<input type="checkbox"/> Reportable Event Audit Finding *	COURT INITIATION INFORMATION <i>Enter Corrected Information as Appropriate</i>			
<input type="checkbox"/> Court ORI	<input type="checkbox"/> Court Case Number	<input type="checkbox"/> Court Case Number	Date Filed Mo. Day Year	
<input type="checkbox"/> Agency Name		<input type="checkbox"/> Comments		

<input type="checkbox"/> Summary Audit Finding *	DISPOSITION INFORMATION <i>Enter Corrected Information as Appropriate</i>										
Count	Audit Finding*	Offense	Statute Citation	CSA	Class	Court Case Number	Disp. Code	Disposition Date Mo. Day Year			
1		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS

<input type="checkbox"/> Summary Audit Finding *	SENTENCE INFORMATION <i>Enter Corrected Information as Appropriate</i>										
Count	Audit Finding*	Sentence Code	Sentence Length Yrs. Mos. Days Hours				Fine Amount	Sentence Status Code	Sentence Date Mo. Day Year		
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS

<input type="checkbox"/> Summary Audit Finding *	OTHER INFORMATION <i>Enter Corrected Information as Appropriate</i>		
<input type="checkbox"/> Court ORI	<input type="checkbox"/> Court Name	Form Signed <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> COMMENTS			

REPORTABLE EVENT
AUDIT FINDING*

*Audit Findings:
A = Accurate and Complete; E = Erroneous; I = Incomplete;
M = Missing; NA = Not Applicable; NSD = No Source Document

CJIS Audit Data Collection Form Custodial Receipt/Status Change

Agency Audited _____

Audit Case No. _____ Auditor _____ Date _____

Subject Name _____

DCN _____ PCN _____

<input type="checkbox"/> Summary Audit Finding *	SUBJECT IDENTIFICATION INFORMATION <i>Enter Corrected Information as Appropriate</i>											
	Subject Name			LAST	FIRST	MIDDLE	Birthdate			Month	Day	Year
	Sex	Race	POB	Hair Color	Skin Tone	Height	Weight	Eyes	Photo Taken <input type="checkbox"/> Yes <input type="checkbox"/> No			
	Scars, Marks, Tattoos			Misc. Number			Social Security Number					
	Driver's Lic. Number			State		Correctional Number						
	Court Case Number			County		Court Case Number			County			
COMMENTS												
<input type="checkbox"/> Summary Audit Finding *	RECEIPT INFORMATION <i>Enter Corrected Information as Appropriate</i>											
	Confining Inst. ORI		Agency Rec'd From ORI			Date Rec'd			Date Printed			
						Month	Day	Year	Month	Day	Year	
	Signed by Official <input type="checkbox"/> Yes <input type="checkbox"/> No			Officer ID No. Noted <input type="checkbox"/> Yes <input type="checkbox"/> No			Signed by Subject <input type="checkbox"/> Yes <input type="checkbox"/> No					
COMMENTS												
<input type="checkbox"/> Summary Audit Finding *	STATUS CHANGE INFORMATION <i>Enter Corrected Information as Appropriate</i>											
	Status Change Code		Status Change Date			Signed by Officer			Dated			
			Month	Day	Year	<input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No			
COMMENTS												

REPORTABLE EVENT AUDIT FINDING*

*Audit Findings:

A = Accurate and Complete; E = Erroneous; I = Incomplete; M = Missing; NA = Not Applicable; NSD = No Source Document

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Appendix III

Sample Audit Questionnaire

Auditor _____
Date _____

**AUDIT QUESTIONNAIRE FOR
COUNTY SHERIFF'S OFFICE**

I. AGENCY INFORMATION

A. Agency Name _____
Address _____

Telephone _____

B. Agency Officials Interviewed:

<i>Name</i>	<i>Title</i>
_____	_____
_____	_____
_____	_____
_____	_____

C. Records Personnel:

<i>Name</i>	<i>Title</i>
_____	_____
_____	_____
_____	_____

D. Official(s) to contact for follow-up questions concerning the audit:

II. CHRI FILES MAINTAINED

1. Determine what files the agency maintains that contain criminal history record information (fingerprint files, arrest booking system, case jackets, incident reports, intelligence or investigative files, inmate files, etc.).

2. Are juvenile records maintained separately from adult records or flagged to distinguish them from adult records?

Yes No Comment _____

3. Is CHRI sealed or expunged upon receipt of a court order?

Yes No Comment _____

III. REPORTING TO ISP

1. Are arrest fingerprint cards prepared and submitted to ISP for:

Yes No All persons arrested for felonies or class A or B misdemeanors?

Yes No All persons already in custody against whom additional charges are filed in unrelated cases?

Yes No All persons ordered by a court to be fingerprinted after conviction for reportable offenses (and not previously fingerprinted)?

Yes No All persons who commit reportable crimes while incarcerated?

Yes No All minors under 17 years of age who are arrested or taken into custody for weapons offenses or forcible felonies as specified in Chapter 38, paragraph 206-5(a)?

Yes No All minors ordered to be tried as adults pursuant to Chapter 37, paragraph 805-4 et seq.?

Comment _____

2. Is the arrest fingerprint card the original source document for subject identification and arrest charge information, or is the information on the fingerprint card and arrest reporting form taken from other records?

- Fingerprint card is original source document
- Information is taken from other records

Comment _____

3. Are arrest fingerprint cards for all reportable offenses sent to ISP within 24 hours of the arrests?
Yes No Comment _____

4. Is there a procedure in effect for "felony review" by the State's Attorney prior to sending fingerprint cards to ISP? Yes No

Comment _____

5. Does the agency notify ISP and request an error correction when charges are not referred to the State's Attorney concerning an individual whose arrest fingerprint card has already been submitted to ISP?
Yes No Comment _____

6. Are procedures in place to ensure that copies 2 through 4 of the completed ISP arrest reporting packet are forwarded to the State's Attorney?

Yes No Comment _____

7. Does the agency submit a completed Custodial/Status Change Fingerprint Card to ISP within 30 days of the initial receipt of a subject *for a sentence of imprisonment* for a reportable offense?

Yes No Comment _____

8. Is the Custodial fingerprint card the original source document for offender identification information and receipt information or is the information taken from other records?

Fingerprint card is original source document

Information is taken from other records

Comment _____

9. Does the agency submit to ISP a completed Status Change form (copies 2, 3 and 4 of the Custodial fingerprint card) within 30 days after any change in status pertaining to the original imprisonment sentence?

Yes No Comment _____

10. Does the agency notify ISP and request an error correction when it discovers errors in previously submitted Custodial/Status Change information?

Yes No Comment _____

11. Does the agency provide training for new officers in the taking of fingerprints and filling out the receipt and status change reporting forms?

Yes No Comment _____

12. Are completed forms reviewed by a supervisor prior to submission to ISP?

Yes No Comment _____

IV. DISSEMINATION

1. Does the agency have adequate procedures to determine that any agencies or persons (including noncriminal justice personnel such as reporters or other news media representatives) to whom CHRI received from ISP is disseminated are legally authorized?
- Yes No Comment _____

2. Does the agency have procedures to ensure that "update inquiries" to ISP are made to obtain the most current information prior to any extra-agency dissemination of information received from ISP?
- Yes No Comment _____

3. Does the agency maintain, for at least three years, logs of all extra-agency disseminations of CHRI received from ISP?
- Yes No Comment _____

4. Do such logs include:
- Yes No The identity of the requestor?
Yes No The authority of the requestor?
Yes No The purpose of the request?
Yes No The identity of the record subject?
Yes No The date of the dissemination?
- Comment _____

5. Is the agency aware that a new user agreement with ISP must be executed if the agency head who signed the prior agreement is replaced?
- Yes No Comment _____

V. SECURITY

1. Are all records or files that include CHRI physically located so that access can be controlled?
- Yes No Comment _____

2. Are adequate procedures in place to ensure that only authorized persons can access CHRI or enter secured areas?
- Yes No Comment _____

3. Are adequate procedures in place to ensure that personnel who have access to CHRI files or facilities can obtain only authorized data and perform only authorized functions?
- Yes No Comment _____

4. Are all CHRI storage areas and facilities adequately protected by fire detection and suppression devices?
- Yes No Comment _____

5. Are all computer terminals and other automated equipment that can access CHRI located in secure areas?
- Yes No Comment _____

6. Are all computer terminals and printers attended during all hours when they are in use and locked or made inoperable during non-use or off-duty hours?
- Yes No Comment _____

7. Does the agency have adequate procedures to provide for the destruction or secure storage of computer printout sheets that contain CHRI?
- Yes No Comment _____

8. Does the agency employ adequate procedures (*e.g.*, locks, passwords, ID codes) to ensure that only authorized persons may operate computer terminals that can access CHRI and that they may perform only authorized functions?
- Yes No Comment _____

9. Does the agency conduct an adequate background investigation (including a criminal history check) of all persons authorized to access CHRI or to work with or around CHRI records and facilities (including janitorial and maintenance personnel)?
- Yes No Comment _____

10. Does the agency have adequate procedures to ensure that non-fee applicant fingerprint cards are submitted to ISP *only* for criminal justice employment in the agency?
- Yes No Comment _____

11. Does the agency have written agreements with any organizations that provide data processing support services under which the agency has management control of noncriminal justice personnel who have access to CHRI?
- Yes No Comment _____

12. Does the agency have a security officer?
- Yes No Comment _____

VI. PERSONNEL TRAINING

1. Are all appropriate personnel properly trained and supervised to ensure that they are familiar with legal requirements applicable to CHRI, such as dissemination limitations, reporting requirements, access and review procedures and security requirements?
- Yes No Comment _____

2. Does the agency have a written Standard Operating Procedures (SOP) manual that includes a section on record handling responsibilities and security/confidentiality requirements?
- Yes No Comment _____

3. Does the agency have sanctions for misuse of CHRI and for other violations of rules and limitations applicable to CHRI?
- Yes No Comment _____

4. Has the agency experienced any incidents involving security violations or record misuse?
- Yes No Comment _____

VII. RECORD SUBJECT ACCESS AND REVIEW

1. Is the agency familiar with the access and review process and the agency's legally-mandated role in the process?
Yes No Comment _____

2. Does the agency maintain adequate copies of the regulations governing access and review and the forms utilized in the access and review process?
Yes No Comment _____

3. Does the agency make copies of the access and review regulations and forms available upon request to persons being processed or previously processed through the criminal justice system?
Yes No Comment _____

4. Does the agency make access and review services available between the hours of 8:00 a.m. and 4:00 p.m. daily except weekends and holidays?
Yes No Comment _____

5. Is the fee charged by the agency in accordance with the regulations (related to the costs of processing reviews and not to exceed \$10)?
Yes No Comment _____

6. Does the agency utilize fingerprint identification to establish the individual's positive identity?
Yes No Comment _____

7. Does the agency comply with the time requirements in the regulations applicable to the forwarding of forms to ISP and notification of the record subject of ISP responses?
Yes No Comment _____

8. Does the agency provide notice of corrected information to all agencies that have received inaccurate records as required by the regulations?
Yes No Comment _____

9. Does the agency, upon request, provide the record subject with a list of noncriminal justice agencies to which the record has been disseminated?
Yes No Comment _____

10. Does the agency keep adequate records of access and review cases to facilitate audit of compliance with the requirements of the regulations?
Yes No Comment _____

Appendix IV

Sample Audit Notice Letter

FORM LETTER

PRE-AUDIT NOTICE TO SHERIFF'S OFFICE

Dear _____:

We have tentatively scheduled an audit of your department for _____ (time) on _____ (date). The purpose of this letter is to confirm the scheduled date and time and to advise you of the nature and scope of the audit. We also are enclosing a brief Pre-Audit Questionnaire that we would appreciate your completing and returning.

If the date and time noted above are not agreeable to you, will you please let us know? Also, if scheduling conflicts arise later, please advise us promptly so that we can reschedule the audit.

The audits we are performing of criminal justice agencies throughout the State are pursuant to (statutory citation). That Act makes all conviction information maintained by the State central repository (including related arrest, sentence and custodial information) available upon request to any member of the public for any purpose. The Act also imposes upon the State central repository a duty to maintain complete and accurate criminal history record information and establishes judicial remedies for the negligent dissemination of inaccurate or incomplete conviction information, including actions for civil damages against State or local governmental agencies.

The Act also requires the State central repository to conduct audits of State and local criminal justice agencies to ensure compliance with the Act and with the law requiring such agencies to report arrest, disposition and custodial information to us (statutory citation). We are also auditing compliance with the provisions of the Interagency Agreements signed by all criminal justice agencies that receive criminal history record information from us. Those agreements incorporate provisions of State law and Federal regulations governing criminal history records (28 C.F.R., Part 20), dealing with limits on re-dissemination, security requirements, and requirements concerning the maintenance of records to facilitate audits, including dissemination logs. Finally, we will audit compliance with Administrative Rules promulgated pursuant to (statutory citation) authorizing record subjects to review and correct criminal history record information concerning them maintained by the State central repository. These rules require arresting agencies and correctional institutions to provide record subjects with facilities for reviewing their records and to assist them in filing challenges if they desire to do so.

The auditors will utilize a questionnaire designed to determine whether your agency is in compliance with the requirements summarized above. For this purpose, they will need to talk with appropriate agency officials and records personnel. The auditors also will wish to tour the areas of your agency where fingerprint files or criminal history files are located or where computer terminals that can access State central repository information are located. They may wish to observe the agency's procedures for completing arrest and custodial fingerprint cards and submitting them to us.

Finally, the auditors will wish to validate the accuracy and completeness of the information on a randomly selected sample of arrest fingerprint cards, custodial fingerprint cards and status change forms submitted to the State central repository by your agency in recent months and will select from your agency's files a sample of recent reportable events of these types to verify that fingerprint cards and status change notices were submitted to the State central repository as required by the reporting law. They will need access to appropriate agency files for these purposes and will need to obtain copies of some source documents, probably not exceeding 15 to 20 pages. We would appreciate your

cooperation in providing access to the needed files; a desk, table or other work space for the auditors; and access to a photocopying machine or assignment of someone to make photocopies as necessary.

As we have previously advised you, we anticipate that the audit will take no more than three to three-and-one-half hours, and we do not believe that agency officials will necessarily need to be available during all of that period. We will strive to ensure that your agency's activities are interrupted to the least possible extent.

When the audit has been completed, we will prepare a written audit report setting out findings and any appropriate recommendations. The report will be submitted to you for your comments before it is prepared in final form. Final audit reports are required by the Act to be available to the public upon request, and to be provided to the Governor and the General Assembly.

We would appreciate your completing and returning the enclosed Pre-Audit Questionnaire within 10 days, if possible. If you have any questions about the audit, please contact this office.

Sincerely,

**CRIMINAL JUSTICE INFORMATION SYSTEM
PRE-AUDIT QUESTIONNAIRE FOR
SHERIFF'S OFFICE**

I. AGENCY INFORMATION

1. Please indicate:
 - a) The population of the jurisdiction served by the agency _____.
 - b) The number of arrests per month for fingerprintable offenses _____.
 - c) The number of offenders received per month to serve sentences of imprisonment _____.

2. Please provide an organizational chart for the agency, identifying the divisions and officials responsible for:
 - a) the taking of arrest and custodial fingerprints and submission of fingerprint cards and status change forms to State central repository
 - b) security and confidentiality of fingerprint files and criminal history record files
 - c) employee training regarding recordhandling policies
 - d) use and security of telecommunications terminals

3. Please provide copies of any written agency policies concerning:
 - a) the taking of fingerprints and reporting of information to State central repository
 - b) security of records
 - c) access to and dissemination of criminal history records

II. AGENCY FILES/REPORTING TO STATE CENTRAL REPOSITORY

1. Please identify and describe any files that contain criminal history record information received from the State central repository, indicating how they are organized and numbered. _____

2. Please describe the procedures for taking fingerprints and completing the Arrest Fingerprint Card and Custodial Fingerprint Card. _____

3. Please describe the procedures for completing and submitting status change forms to the State central repository. _____

4. Is the offender identification information and other information entered on the Arrest Fingerprint Card and/or Custodial Fingerprint Card taken from some other source records (such as arrest reports, incident/offense reports, inmate reception reports or court commitment papers) or are fingerprint cards filled out as "original" records utilizing information provided by the offender and the arresting or receiving officer? _____

5. Please identify the types of arrested and incarcerated persons (by offense type and offender type) whose fingerprint cards are submitted to the State central repository. _____

6. Please describe the procedures for submitting Arrest and Custodial Fingerprint Cards to the State central repository, including times of submission. _____

7. Does the agency need additional copies of the State central repository's Instructions for completing and submitting Arrest Fingerprint Cards and Custodial Fingerprint Cards? Yes No

III. USE AND DISSEMINATION

1. Please provide the number and location of telecommunications terminals in the agency. _____

2. Who has access to the terminals and for what purposes? _____

3. Does the agency make criminal history record information received from the [State central repository] available to any noncriminal justice persons or agencies? Yes No

If so, describe the procedure and indicate who has access and for what purposes. _____

4. Please describe the logs kept of extra-agency disseminations of criminal history record information received from the State central repository, and indicate how long they are kept. _____

IV. SUBJECT ACCESS/REVIEW

1. Are agency officials familiar with the Administrative Regulations permitting record subjects to obtain and review their criminal history records and challenge the accuracy and completeness of the records? Yes No
2. Are agency officials familiar with the role of arresting and correctional agencies in the review/challenge process? Yes No
3. Does the agency have sufficient copies of the regulations and applicable forms for subject access/challenge? Yes No