

A PROPOSED MODEL
FOR
EVALUATING DISTRICT OPERATIONS
IN
ADULT PROBATION AND PAROLE SERVICES

67468

VIRGINIA DEPARTMENT OF CORRECTIONS
Division of Program Development and Evaluation
Research and Reporting Unit

November 1978
Report No. 7804

ACKNOWLEDGEMENTS

This study was prepared by James Duke, Corrections Researcher. Inquiries concerning this paper should be directed to the Research and Reporting Unit.

The study was funded in part by LEAA funds secured through DJCP Action Grant No. 78A-4436 awarded the Department of Corrections by the Council on Criminal Justice.

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EXPLANATORY NOTE

The original title of this document was "A Proposed Model for Evaluating District Operations in the Division of Probation and Parole Services." It was written in May 1978 and distributed in draft form to members of a divisional committee charged with developing approaches to monitoring and evaluation of district office operations.

Effective September 1, 1978, a reorganization of the Department of Corrections had the functions and responsibilities of the Division of Probation and Parole Services placed under the administration of the new Division of Community and Prevention Services. Within this division, each of five regional offices has an Adult Probation and Parole Services Manager who supervises a designated number of probation and parole district offices. The district offices will operate and perform services essentially the same as they did before the reorganization.

Thus, the intent to evaluate "district operations" remains a valid one and our purpose here of proposing a model for evaluation is in accord with the mission of the Research and Reporting Unit.

Introduction

The purpose of this paper is to explain a model evaluation approach designed for assessing the operation of district offices charged with delivering adult probation and parole services in the community.

This is not designed for in-depth analysis of programs, but evaluations based on this model can give the administrator the kind of information to determine whether operations are functioning properly or whether they are in need of assistance. Again, this system encompasses only program operations and excludes client outcome analysis. For this reason mainly --- although evaluations by this method can be used to group districts into similar categories --- they cannot provide reliable district-by-district rankings. Such rankings are beyond the scope of the analysis employed.

This approach identifies areas of critical interest and focuses on getting reliable data for those areas. Data can be collected systematically and highlighted in a consistent format to satisfy immediate purposes as well as to set the stage for further data collection as needed.

This model is based principally on analytical criteria with sufficient consideration given to descriptive data. In addition, the evaluator's observations made on-site can assist in the interpretation of more quantitative data. That such an interpretation is needed rests too on the fact that each district's characteristics are different -- e.g., its location, growth history, clientele, etc. Therefore,

descriptive characteristics which reflect some elements of subjective assessment are seen as a necessary part of a district's evaluation.

Analytical Criteria

In this model ten analytical criteria, six quantitative and four qualitative, are selected as major program performance measures. The quantitative measures are:

- cost per client-year;
- staff-client ratio;
- officer-client ratio;
- staff-turnover rate;
- percent of parole/pardon cases in compliance with minimum standards; and
- percent of probation cases in compliance with minimum standards.

The qualitative criteria are:

- level of services provided to clients;
- scope of record-keeping systems;
- quality of records; and
- validity of reported data.

Qualitative considerations are too often ignored in evaluating program operations. Although not readily quantifiable, such information is critically reflective of a district's operations. The evaluation team should be able, based on its extensive interview with the Chief Probation and Parole Officer (Evaluation Questionnaire) and contacts

with other staff members along with the team's inspection and validation of data contained in case records and administrative files, to incorporate those qualitative factors into the overall assessment of a district office.

Descriptive Information

Descriptive information about each district office's operations can be summarized under four categories:

- background (e.g., district number, location, number of jurisdictions served, number of judges, and C.P.O.)
- funding (e.g., grant funds, total funds, and amount spent)
- caseload data (e.g., investigations, supervision cases, case terminations)
- staff (e.g., authorized and filled positions and person-years of effort)

Implementation Procedures

Implementation procedures can be considered in terms of activities performed by the evaluation team before, during, and after the visit to the district office. Before the site visit, besides formally arranging the visit, the team should review related records and reports on file at Central and Regional offices.

At the district office, the evaluation team:

- interviews the Chief Probation & Parole Officer;
- interviews other staff members, as indicated;
- tours the office facility;
- reviews selected records, including several randomly selected files on individual supervision cases; and

- uses data collection forms to fill in financial, staff, and client data.

After the visit, the evaluation team analyzes the data collected and prepares its report in a prescribed manner. Immediate feedback to the district office should occur by sending the office a draft of the finished report for their review and comments.

Evaluation Report

The final evaluation report on each district should be kept short, focused on the major features of the program and can be organized as follows:

- Highlights
- Descriptive Summary
- Analytical Summary
- Assessment Summary

The highlight's section can be limited to a one- or two-page summary of the major features of the analytical summary, descriptive summary and pertinent observations of the evaluation team. Sub-sections can include:

Background: Identification of district, location, jurisdictions served, magnitude of operations, special capacities, grant funding (if any) data, and other important points should be presented.

Program Strengths: This should summarize operational strong points and cite relevant data to support the judgments made.

Program Weaknesses: The district operations' weak points should be summarized, along with any extenuating circumstances or other explanations.

Technical Assistance Needs: The technical assistance needs of the district office and its operations should be discussed.

Recommendations: Recommendations related to services, staffing, and technical assistance needs should be presented along with the rationale underlying those recommendations.

The descriptive and analytical summaries are discussed elsewhere in this paper.

The final section, topical evaluative statements or assessment summary, serves to incorporate the evaluation team's impressions and observations. Specific topics which may be addressed are:

1. Facility: Any problems with space, layout, condition, location, etc., are noted.

2. District Office Administrator: The evaluation team assesses both the administrator's responses to questions and the general level of management ability, as reflected in the district's operations.

3. Staff: This may include comments on overall impressions of the staff's capabilities, motivation and workload, as well as discussion of any problems concerning staff training, staff organization, staff turnover, vacancies, etc.

4. Client Services: The type and extent of services are addressed in the interview with the Chief Probation and Parole Officer. This can be related to information gained from perusal of client records and on-site observations.

5. Records: Comments on the scope and quality of administrative and management record system maintained.

6. Client Records: Assessment should be based on on-site review of client records and should consider both scope and quality.

7. Validity of Report Data: Evaluators should comment on the extent to which the data they verified agreed with the data reported by the program.

8. Other Problems or Comments: Other items which seem important for a district's operations should be discussed. This could include community relations problems, hours of operation, allocation of staff, etc.

9. Technical Assistance Needs: These comments would be similar to those included in the Highlights section.

10. Recommendations: Similar to those in the Highlights section.

DATA COLLECTION AND REPORTING FORMS/TABLES

Examples and models of data collection and reporting forms are included on the following pages as well as model summary tables for the final report.

A principal part of this material is the Evaluation Questionnaire which is used to interview the Chief Probation and Parole Officer of each district office. The responses to this questionnaire and the evaluators' interpretation of them as they relate to other data serve to form a critical part of the final evaluation report.

DISTRICT OFFICE
EVALUATION QUESTIONNAIRE*

*This questionnaire was developed by Mr. W. E. Boldin, Jr., Assistant Director, Division of Probation and Parole Services and published in a memorandum entitled "District Performance Indicators" sent to the Division Regional Administrators, October 5, 1977.

DISTRICT OFFICE
EVALUATION QUESTIONNAIRE

DISTRICT _____

CHIEF PROBATION OFFICER _____

DATE _____

1. Court Services

A. Referrals

1. Does the Clerk of Court notify the office of referrals for P.S.I.'s?

Answer/Comments:

2. Does the CPO know of all referrals at or near the time made and know when investigations are completed?

Answer/Comments:

3. Do the courts generally require a specific return date on referrals?

Answer/Comments:

4. Does the CPO require that officers complete P.S.I.'s within given time frames?

Answer/Comments

5. Does CPO confer with the judge(s) in the district:

- a. Quarterly? _____
- b. Monthly? _____
- c. Weekly? _____
- d. Other times? _____
(specify)

To discuss the services being provided by staff?

Answer/Comments:

6. Is CPO made immediately aware of it when dissatisfaction is expressed concerning a P.S.I. report rendered by a member of your staff if the expression is from:

- a. The judge? _____
- b. The Commonwealth's Attorney? _____
- c. The Defense Attorney? _____
- d. The offender or family? _____
- e. Others? _____

Answer/Comments:

7. Does CPO review P.S.I. reports made by staff prior to them being submitted to the court?
- | | |
|------------------------|---------------------|
| a. All? _____ | Almost never? _____ |
| b. 50%? _____ | Upon Request? _____ |
| c. 10%? _____ | Never? _____ |
| d. Occasionally? _____ | |

Answer/Comments

B. Supervision

1. Is the CPO or DCPO reviewing with the P.O.'s the cases of new probationers and assisting in developing supervision plans?

Answer/Comments:

2. Is the CPO or DCPO reviewing the probation cases who are reported to be in violation states:
- | |
|--|
| a. Before a capias or PB-15 is issued? _____ |
| b. Before case brought to court? _____ |
| c. After court appearance? _____ |
| d. Usually not at all? _____ |

Answer/Comments:

3. Are all probationers in the district personally contacted by staff after being placed on probation:
- a. Within a month? _____
 - b. Within a week? _____
 - c. Within 72 hours? _____
 - d. Don't know? _____

Answer/Comments:

4. Is case "staffing" done in the district?
- a. At regular staff sessions? _____
 - b. At special sessions? _____
 - c. Who attends? _____

Answer/Comments:

5. Do all the PO staff have access to and use dictating equipment to record supervision histories?

Answer/Comments:

6. When the probation period expires or prior thereto:
- a. Is there a court order discharge given to offender? _____
 - b. Does the PO write a letter to offender? _____
 - c. Is offender orally told that he is off probation? _____
 - d. No official action is taken? _____

Answer/Comments:

7. When action to revoke probation is taken by the court, which if any of the following is/are done?
- a. A written review of case made by the PO and received by the CPO? _____
 - b. The case summarized and copies sent to C.O. with copies of P.S.I.? _____
 - c. Indications made in cover letter of any unusual circumstances of time of sentencing such as voiced threats, etc.? _____
 - d. Indications made by supervising officer as to what treatment or programs the individual should receive while incarcerated as a result of the revocation action.

Answer/Comments:

8. Are the Probation and Parole Officers in the district giving supervision to probation cases not exempted in compliance with minimum standards?
- a. In 95% of the cases? _____
 - b. In 90% of the cases? _____
 - c. In 85% of the cases? _____
 - d. In 75% of the cases? _____
 - e. In 60% of the cases? _____
 - f. a, b, c, d, e, f (circle one) of the above except for _____ (provide #) officers.

Answer/Comments:

II. Parole/Pardon Services

A. Referrals

1. Do all requests for FR's, OR's, PR's, etc., go to the CPO or DCPO for assignment within the date of receipt?

Answer/Comments:

2. Is there a conference held between CPO or DCPO and each Probation and Parole Officer on a regular basis to review status of investigations assigned?
- a. Weekly? _____
 - b. Bi-weekly? _____
 - c. Monthly? _____
 - d. Other? _____
 - e. Only for newer officers? _____

Answer/Comments:

B. Investigations

1. Is average response time for all requested parole/pardon investigations:
 - a. Under 45 days? _____
 - b. Under 35 days? _____
 - c. Under 30 days? _____
 - d. Under 25 days? _____
 - e. Under 20 days? _____
 - f. Under 2 weeks? _____
 - g. One of above _____ (specify) except for _____ (#) officers

Answer/Comments:

2. Is it generally true that officers in the district meet the Probation and Parole Officers' Manual requirements in Parole/Pardon reports made?

Answer/Comments:

C. Supervision

1. Are Probation and Parole Officers in the district giving supervision to parole/pardon cases in compliance to the minimum standards?
 - a. In 95% of the cases? _____
 - b. In 90% of the cases? _____
 - c. In 85% of the cases? _____
 - d. In 75% of the cases? _____
 - e. In 60% of the cases? _____
 - f. One of above _____ (specify) except for _____ (#) officers

Answer/Comments:

2. Is case "staffing" a practice in the district?

Answer/Comments:

3. Is the CPO or DCPO reviewing with the PO's new pardon/parole cases and assisting in developing supervision plans?

Answer/Comments:

4. Is the CPO or DCPO reviewing parole/pardon cases reported in violation status:
- a. Before a PB-15 is issued? _____
 - b. Before a preliminary hearing? _____
 - c. Before new court cases are tried? _____
 - d. Before PB Warrant is requested? _____
 - e. All of above? _____
 - f. None of above? _____

Answer/Comments:

5. Are PO's indicating what should be done (program, etc.) individuals who have been under their supervision and whose parole/pardon has been worked?

Answer/Comments:

III. Administrative Services

A. Manuals

1. Does each PO have a Probation and Parole Officer's Manual and is it kept current with all changes entered?

Answer/Comments:

2. Is a Departmental Policy Manual readily available to all staff and does each staff person review changes when they are received?

Answer/Comments:

3. Is a Parole Board Policy Manual readily available to all staff?

Answer/Comments:

B. Staff Supervision

1. Are regular staff sessions held?
 - a. Including CPO, DCPO's PO's and Secretaries? _____
 - b. Including CPO and DCPO's? _____
 - c. Including CPO, DCPO's and PO's? _____
 - d. Including CPO, PO's and Secretaries? _____
 - e. Including CPO and PO's? _____
 - f. Including CPO and Secretaries? _____

Answer/Comments:

2. Are staff sessions held:
- a. Weekly? _____
 - b. Bi-weekly? _____
 - c. Monthly? _____
 - d. Quarterly? _____
 - e. As needed? _____
 - f. Seldom? _____
 - g. Never? _____

Answer/Comments:

3. Are personnel records kept on each district employee?

Answer/Comments:

4. Are written evaluations made of employees' other than the annual merit ratings?

Answer/Comments:

5. Does CPO and/or DCPO's actually go with veteran PO's on routine day from time to time to monitor techniques, etc.?

Answer/Comments:

C. Training Services

1. Is an orientation provided locally for each new employee?

Answer/Comments:

2. Is an in-service training schedule made for all district personnel?

Answer/Comments:

3. Does the local orientation include introduction to local officials and local resources available?

Answer/Comments:

4. Is there current professional literature made available to staff?

Answer/Comments:

5. What percentage of staff is involved on a yearly basis with at least 30 hours of formally approved training?

- a. 100 - 90% _____
- b. 90 - 80% _____
- c. 80 - 70% _____
- d. 70 - 50% _____
- e. Under 50% _____

Answer/Comments:

FUNDING BY SOURCE OF FUNDS

PROGRAM NAME: _____

Note: The fiscal year (FY) is July 1 - June 30.

Source	Date of First Funding	Amount Available (Budget)				Amount Expended			
		Past FY		Current FY		Past FY		Current FY*	
		Total	For Staff	Total	For Staff	Total	For Staff	Total	For Staff
Federal Agency:									
LEAA									
NIMH									
HUD									
Other: _____									
State									
Local									
Private									
TOTAL		\$	\$	\$	\$	\$	\$	\$	\$

*Through month of _____

GRANT INFORMATION

Note: One column should be completed for each grant in effect during the past or current Fiscal year.

ITEM	AGENCY				
Grant:					
Amount					
Starting data.					
Ending data.					
Budget Amendment Dates:					
Amount spent through _____					
Date funds are expected to be exhausted. . . .					

STAFF DATA

PROGRAM NAME _____

Note: This form should contain information on all persons who have worked in the program during the past or current fiscal year.

Name	Position Title	Date Hired	Date Left (if Applicable)	Annual Salary	Hours Worked Per Week

Information provided by:

Name: _____

Title: _____

Date: _____

Personnel records can be examined at the following location:

DESCRIPTIVE SUMMARYI. Background

District Number:

Location (address):

Number of Jurisdictions Served:

Number of Judges: Circuit: _____ District: _____

Chief Probation and Parole Officer:

Telephone No.:

II Funding

<u>ITEM</u>	<u>PAST FISCAL YEAR 19xx-xx</u>	<u>CURRENT FISCAL YEAR 19xx-xx</u>
Grant Funds*	\$	\$
State Funds	\$ \$ \$	\$ \$ \$
<hr/>		
Amount Spent	\$	\$ **

*Grant:
 ** As of: date

(In this table grant funds, state funds, and the amount spent for the past fiscal year and the current fiscal year to-date are presented. This information comes from financial data reports on file at the district office or at the Bureau of Accounts)

III Caseload DataA. Caseload (As of date

Category	Male	Female	TOTAL
Parole			
Probation			
Pardon			
Post-Parole Assistance			
TOTAL			

(This table presents the number of clients,
by category and sex, currently receiving
service)

B. Investigative Reports - FY _____

<u>Number of Reports</u>	Pre/Post Sentence	Field	Pre- Release	TOTAL
1. Continued from last year				
2. Added during year.				
3. Total (Sum of 1 and 2)				
4. Completed during year				
5. Carried forward to next year (3 less 4).				

(This table presents the number of investigative reports by type processed and completed during a fiscal year)

C. Parole Cases under Supervision FY _____

Number of Cases

TOTAL

1. Under supervision beginning of year . .	
2. Received during year.	
3. Total (Sum of 1 and 2).	
4. Released during year	
5. Under supervision end of year (3 less 4)	

(This table presents the parole supervision cases handled during a fiscal year)

D. Pardon Cases under Supervision - FY _____

Number of Cases

TOTAL

- | | |
|---|--|
| 1. Under supervision beginning of year . . | |
| 2. Received during year. | |
| 3. Total (Sum of 1 and 2). | |
| 4. Released during year | |
| 5. Under supervision end of year (3 less 4) | |

(This table presents the pardon supervision cases handled during a fiscal year)

E. Probation Cases Under Supervision - FY _____

<u>Number of Cases</u>	<u>Circuit Court</u>	<u>District Court</u>	<u>TOTAL</u>
1. Under supervision beginning of year . .			
2. Received during year.			
3. Total (Sum of 1 and 2).			
4. Released during year			
5. Under supervision end of year (3 less 4)			

(This table presents the probation supervision cases handled during a fiscal year)

F. Cases under Supervision (Summary) FY _____

<u>Number of Cases</u>	<u>Parole</u>	<u>Pardon</u>	<u>Probation</u>	<u>TOTAL</u>
1. Under supervision beginning of year . .				
2. Received during year.				
3. Total (Sum of 1 and 2).				
4. Released during year				
5. Under supervision end of year (3 less 4)				

(This table summarizes the total supervision caseload for a fiscal year)

G. Case Termination Data - FY _____

<u>Type of Termination</u> (Broadly Defined)	<u>Parole</u>	<u>Pardon</u>	<u>Probation</u>	<u>TOTAL</u>
Discharge				
Revocation				
Transfer				
	_____	_____	_____	_____
TOTAL				

(This table presents a breakdown of terminated cases by type and category of supervision)

IV. Staff

	Chief B	Chief A	P/P Off.	Clerical	TOTAL
Authorized positions (date) . .					
Staff resignations FY xx-xx . .					
Staff person years FY xx-xx . .					
Authorized positions (date) . .					
Filled positions (date) . .					

(Included is data on the past and current fiscal years, relating to authorized and currently filled positions, as well as staff resignations and staff person-years)

ANALYTICAL SUMMARY*

A. Cost per client-year	
(1) Current rate ()	
(2) Current FY through 19	
(3) Past FY ()	
B. Other Quantitative Indices:	
1. Staff-client ratio	
2. Counselor-client ratio	
3. Staff turnover rate	
4. Percent of parole/pardon cases in compliance with minimum standards	
5. Percent of probation cases in compliance with minimum standards	
C. Qualitative Indices: **	
1. Level of services provided to clients . . .	
2. Scope of record-keeping systems	
3. Quality of records	
4. Validity of reported data	

* See definitions of indices in Appendix

** These areas are rated as "high," "medium," or "low." The "medium" level is defined specifically, and the other two levels are defined relative to that standard.

ASSESSMENT SUMMARY

Facility:

C.P.O.:

Staff:

Client Services:

Records:

Client Records:

Validity of Reported Data:

Other Problems or Comments:

Technical Assistance Needs:

Recommendations:

CONSOLIDATED
EVALUATION REPORT
FORMAT

EVALUATION

PROBATION AND PAROLE DISTRICT NO. _____

19 _____

HIGHLIGHTS

BackgroundProgram StrengthsProgram WeaknessesTechnical Assistance NeedsRecommendations

DESCRIPTIVE SUMMARYI. Background

District Number:

Location (address):

Number of Jurisdictions Served:

Number of Judges

Circuit: _____

District: _____

Chief Probation and Parole Officer:

Telephone No.:

II Funding

<u>ITEM</u>	<u>PAST</u> <u>FISCAL YEAR</u> <u>19xx-xx</u>	<u>CURRENT</u> <u>FISCAL YEAR</u> <u>19xx-xx</u>
Grant Funds*	\$	\$
State Funds	\$	\$
	\$	\$
<hr/>		
Amount Spent	\$	\$ **

*Grant:

** As of: date

III Caseload DataA. Caseload (As of date)

Category	Male	Female	TOTAL
Parole			
Probation			
Pardon			
Post-Parole Assistance			
TOTAL			

B. Investigative Reports - FY Number of Reports

	Pre/Post Sentence	Field	Pre- Release	TOTAL
1. Continued from last year				
2. Added during year.				
3. Total (Sum of 1 and 2)				
4. Completed during year				
5. Carried forward to next year (3 less 4).				

C. Parole Cases under Supervision FY _____

Number of Cases

TOTAL

1. Under supervision beginning of year . .	
2. Received during year.	
3. Total (Sum of 1 and 2).	
4. Released during year	
5. Under supervision end of year (3 less 4)	

D. Pardon Cases under Supervision - FY _____

Number of Cases

TOTAL

1. Under supervision beginning of year . .	
2. Received during year.	
3. Total (Sum of 1 and 2).	
4. Released during year	
5. Under supervision end of year (3 less 4)	

E. Probation Cases Under Supervision - FY _____

<u>Number of Cases</u>	Circuit Court	District Court	TOTAL
1. Under supervision beginning of year . .			
2. Received during year.			
3. Total (Sum of 1 and 2).			
4. Released during year			
5. Under supervision end of year (3 less 4)			

F. Cases under Supervision (Summary) FY _____

<u>Number of Cases</u>	Parole	Pardon	Probation	TOTAL
1. Under supervision beginning of year . .				
2. Received during year.				
3. Total (Sum of 1 and 2).				
4. Released during year				
5. Under supervision end of year (3 less 4)				

G. Case Termination Data - FY _____

<u>Type of Termination</u> (Broadly Defined)	<u>Parole</u>	<u>Pardon</u>	<u>Probation</u>	<u>TOTAL</u>
Discharge				
Revocation				
Transfer				
	_____	_____	_____	_____
TOTAL				

IV. Staff

	Chief B	Chief A	P/P Off.	Clerical	Total
Authorized positions (date) . .					
Staff resignations FY xx-xx . .					
Staff person years FY xx-xx . .					
Authorized positions (date) . .					
Filled positions (date) . .					

ANALYTICAL SUMMARY*

A. Cost per client-year	
(1) Current rate ()	
(2) Current FY through 19	
(3) Past FY ()	
B. Other Quantitative Indices:	
1. Staff-client ratio	
2. Counselor-client ratio.	
3. Staff turnover rate	
4. Percent compliance parole/pardon cases	
5. Percent compliance probation cases	
C. Qualitative Indices:	
1. Level of services provided to clients . . .	
2. Scope of record-keeping systems	
3. Quality of records	
4. Validity of reported data	

* See definitions of indices in Appendix

ASSESSMENT SUMMARY

Facility:

C.P.O.:

Staff:

Client Services:

Records:

Client Records:

Validity of Reported Data:

Other Problems or Comments:

Technical Assistance Needs:

Recommendations:

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APPENDIX

DEFINITIONS
(See Analytical Summary)

- A.1: $\frac{[(\text{Costs for most recent month}) \times (12)]}{(\text{Number of clients supervised})}$
- A.2: $\frac{(\text{Costs for current FY to date})}{(\text{Current FY client-years of supervision to date})}$
- A.3: $\frac{(\text{Costs for past FY})}{(\text{Past FY client-years of supervision})}$
- B.1: $\frac{(\text{Number of staff-members})}{(\text{Average number of clients})}$
- B.2: $\frac{(\text{Number of officers})}{(\text{Average number of clients})}$
- B.3: $\frac{(\text{Number of staff separations})}{(\text{Average employee strength})}$
- B.4: $\frac{(\text{Number of parole/pardon cases in compliance})}{(\text{Total number of parole/pardon cases})}$
- B.5: $\frac{(\text{Number of probation cases in compliance})}{(\text{Total number of probation cases})}$
- C.1: "Medium" is interpreted as a standard based on criteria periodically set by the Division of Probation and Parole Services, above which point or level would be "High" and below which, "Low."
- C.2: "Medium" means (pursuant to uniform criteria set by the Division) that records, statistics, reports are routinely kept on district operations; individual client records, which include completed forms, reports and counseling entries are basically adequate. "High" would denote more extensive records-keeping and "Low" of less.
- C.3: "Medium" means that 70-80% of the records are relatively complete, up-to-date, and consistent. Client records include timely counseling notes which seem relevant and useful. "High" indicates that more than 80% meet these conditions and "Low" less than 70%.
- C.4: "Medium" indicates that data verified by the evaluation team and data reported by the program differ by 5-10%. "High" indicates differences of less than 5% and "Low" of more than 10%.

END