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“CEA Standards - Making Correctional Education
Professional and Accountable”

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It gives me great pleasure to address such an august and distinguished group of correctional educators. Thank you for inviting me to talk about CEA standards. My hope is that you will be able to learn something from our North American experience that is worthwhile and applicable to your particular situation. My hunch is that there is a tremendous overlap in the work that we all do and we can be of great assistance to each other by sharing our standards, curricula and training efforts.

While no one should apologize for his or her accent, it is I who has the funny sounding pronunciation. My wife says that having grown up in Chicago makes it even worse. She is from Pittsburgh, so what does she know? In any case, because it is easy to misunderstand someone from another part of the English speaking world I will try to speak clearly and enunciate properly. Please feel free to raise your hand or interrupt me if you are having difficulty.

The Correctional Education Association

The CEA is primarily a North American association, but we do call ourselves “an international organization” because we do not want to be exclusively American. While most of our officers are American, we do have two international representatives on our Executive Board. One represents Canada, another all other countries outside North America. Our membership

currently numbers close to 3,000 with about 100 from outside the United States.

Our general purpose is promote the correctional education profession through publications, research, training and public advocacy. We do this primarily through journals, newsletters and conferences.

Correctional Education Issues and Problems in the USA

In North America correctional education for adults and juveniles generally finds public support, but it does not survive because of public support per se. Education in adult prisons, particularly, is very politically sensitive. While a few polls that have been taken show the public supports basic and high school education, the level of support is often subject to the latest headlines. One is hard pressed to find correctional education on any list of state or federally funded priorities. Some politicians see the need for education in the adult and juvenile lock-ups and support special set asides of federal funds, but the set asides are always a point of contention with the education community who often see it as a threat to their programs or with people who see the primary purpose of prisons as punishment.

There is a need for accurate information and statistics which demonstrates the value and effectiveness of correctional education. This can help to gain and maintain public support. Since no one else is going to advocate for correctional education those of us who teach and run correctional education programs must be actively involved if we are to survive as a profession. Finally, better and more universally applicable research is needed to make our programs accountable and defensible.

My purpose here today is to talk about correctional education standards, but I would like to take a few moments to tell you about some of the recidivism research we are conducting at CEA to demonstrate the value and effectiveness of adult correctional education programs.

The recidivism research conducted in the USA and Canada over the last 20 years has been favorable and makes a good case that education for incarcerated adults has a positive impact on post release behavior in terms of crime reduction, increased employability and behavior on parole. However, the studies are not definitive because most of them only track a particular group such as vocational students, high school graduates or college students

after release. There are often weak comparison groups and no real control groups in any of the studies making it difficult to say whether or not the education program participants did better as a result of education or because of some inherent characteristic in the groups themselves. To get around this problem CEA is conducting a multi-state long term study to evaluate over 3,000 adult felons released in late 1997 and early 1998. We are collecting information from inmate surveys, criminal justice and institutional records and data from parole authorities and entering them into a huge database. We will look at every factor known to relate to criminal activity.

The design allows us to look at every inmate, student and non-student in order to build an internal control group. Look for the first results to be published late 1998. For those who are interested we have developed bubble sheets and inmate survey forms, software to collect criminal justice data and statistical packages to analyze the data itself. We will be happy to share this with interested parties as it becomes available.

Status of Correctional Education in USA Prisons

In the United States correctional education has had its ups and downs. It is not my purpose to trace that history here today. I do think it important to keep in mind that education is the most ubiquitous program in our prisons. Generally, wardens of adult facilities value education as a necessary component of good prison management. Most believe that it also contributes to a reduction in recidivism. The professional association for correctional staff, the American Correctional Association, has its own standards for education programs, most of which were written by CEA and accepted by the ACA Commission on Accreditation. At the present time ACA is reviewing the revised set of CEA standards which I will talk about today. By August, 1998 it is likely ACA will not only recognize CEA standards, but also accept CEA accreditation of any institutions that ACA audits. This endorsement is a tremendous boost for our profession because it means many wardens and corrections directors will seek our review and endorsement of their programs along with ACA standards and thereby heighten the importance of CEA and correctional education in general.

Status of Correctional Education in American Education

Most education programs in juvenile and adult institutions do not have endorsement from outside accreditation agencies. Sometimes state laws give adult facilities the power to grant high school credits and diplomas. Often there is some agreement between juvenile correctional agencies and public schools for credit transfer. Because of a need to create a review process that specifically addresses correctional education programs the state directors of correctional education and CEA drew up the first set of 31 standards back in 1988. Under the leadership of our first executive director, Dr. Osa Coffey, a lengthy series of planning meetings and hearings was conducted over two years until there was general agreement on minimum standards for adult and juvenile education programs.

While these standards were recognized by state directors of correctional education programs, at first they were not used widely in program evaluation. This has changed in the last few years. But it had also become obvious that revisions were needed, particularly better performance indicators. Also, in recent years numerous states and Correctional Services of Canada have formally recognized CEA standards and are undergoing audit and accreditation by CEA. We have developed a very formal process for training both auditors and agency staff being audited. I will tell you later about the formal process we have developed.

I would like to show you one of the 1988 CEA Standards to illustrate how we changed to performance based rubric in recent years.

1. Administration

001 PHILOSOPHY AND GOALS: There is a written statement describing the philosophy and goals of the system-wide correctional education program. (Mandatory)

DISCUSSION: The written philosophy and goals statement clarifies the specific legislative mandate which authorizes the provision of educational services. It further explains the role of education within the framework of the overall agency mission. It communicates the agency's support for education programs to meet the needs of individual students, the correctional system, and society. The written philosophy statement is made available to education staff and students and serves as a vehicle to communicate the purpose of the correctional education program to the legislature, agencies providing funding or services, and the public.

You will notice that the thirty-one 1988 standards were followed by a discussion. The auditor would apply the standard only and use the discussion as a guide. The only mandated part was the standard itself. This caused some problems on what constituted proof that the standard was, in fact, being followed. It opened up a wide area of interpretation. As more institutions and states became interested in the standards we switched to a more definitive and measurable context.

The 1998 CEA Standards are more numerous because we broke down the thirty-one standards into distinct measurable items. At first they numbered over 150 and then we revised them again into the current 84. You can see by the examples that it is relatively easy to determine evidence of compliance. Let us look more specifically into the new standards and the audit process itself.

ADMINISTRATION

Principle: There is written legal authorization for establishing, operating, funding and governing a correctional education organization.

GOVERNANCE, PHILOSOPHY AND GOALS:

Standards

1. There is a legal basis for the correctional education organization to conduct the educational programs. (Required, Core)
2. There is a mission statement describing the goals of the organization. (Required, Core)
3. The mission statement is publicly displayed for the benefit of staff, students, and/or other interested parties.
4. The mission statement is included in at least two separate educational organizational documents.

The Use of CEA Standards in Program Evaluation - CEA Audit Procedures

There are some general criteria that were used in developing performance-based standards:

1. Standards are to be used to evaluate the quality of compliance for specific program areas.
2. Standards measure the compliance according to the stated philosophy and goals of the system being audited.
3. Standards are not separate or independent criteria superimposed on a system that must be met, but rather they are used evaluate the performance of the system itself.
4. Standards are minimum areas to be met and any system may extend beyond them according to their own development and purposes.

Passing CEA Audits

The Standards for Adult and Juvenile Correctional Education Programs are comprised of 84 standards based on 4 major categories. Each category contains a principle to introduce the concept and focus for the audit. Following the principal there are standards which specify the criteria that must be met in order to be judged in compliance.

There are 24 required standards that must be met in order to pass the audit. In addition, there are 60 standards that are not required but of these at least 90% must be in compliance in order to pass. Unless waivers have been granted for non-required standards it is necessary to pass 90% of the remaining standards in order to pass this section. Throughout there are 43 core standards found in both the required and non-required groups. In most correctional education systems, documentation for these will be available from the office of the chief education administrator for the system. It is the responsibility of the system and institution being audited to ensure all necessary documentation is on site and available for the auditors to review.

The breakdown of the standards is:

Required	24
Non-required	<u>60</u>
Total number of standards	84
(Core)	(43)

Once again, to pass an audit the system/institution must demonstrate compliance with all (100%) of the 24 required standards and 90% of the

non-required standards.

Definitions of the Standards

Core standards apply across a correctional education system whether there is only one institution or more. These are policies which apply across the system. These will be the responsibility of the education agency's central administrative office to develop and disseminate to all the institutions in the system.

Required standards are those which are essential to the overall quality of the program as to have been judged mandatory. Some of them are Core standards. All required must be met by the education agency in order to pass the standards audit.

Non-required standards are those that are not as important and which may not be met without jeopardizing the general or overall quality of the program. Up to 10% of these may not be in compliance and the institution can still pass the audit..

Majors Areas in CEA Standards

CEA Standards cover four major areas: administration, staff, students and program. Under administration standard topics such as legal governance, philosophy, budget, program approval and staff meetings are covered.

In the area of staff authority, staff training, personnel policies, business and industry involvement, salary scales and student/teacher ratio are included.

The student area involves incentives, assessment, programs, recordkeeping and orientation.

Finally, the program area is comprised of curriculum, equity, exceptional students, programs for segregated students, technology, materials and post secondary education.

At this time I will not go into any detail for each standard. They are all set up similar to the standards examples under administration which I showed

you earlier. I will be happy to talk more specifically about them later in the conference when we have an open discussion.

Steps of the Evaluation Process

CEA has put together a very thorough process with which it trains the agency being audited. First there is the internal review or self audit. The agency is taught how to organize the process. Such topics include the choice of an internal audit leader and audit team, their duties, a time schedule, the purpose of the audit and how to notify staff and gain their support and participation. CEA sends out an auditor to train the agency in the audit process.

The agency learns to document strengths, clarify questions or uncertainties, and then articulate a response or corrective action plans with timelines.

The agency also learns how to assemble its files for an audit so that an outside auditor can readily find all the documentation and materials needed to determine whether or not an agency is in compliance.

When ready for an outside audit the agency asks CEA to send in auditors to conduct its independent evaluation. The auditors audit the system and individual institutions, review documentation, make necessary visitations throughout the institution, conduct interviews of staff and students, verify compliance and identify non-compliance. They will make recommendations and determine the level of compliance at each institution.

Since most audits reveal deficiencies, even if an institution passes the audit the agency will want to eliminate any deficiencies. After the CEA Committee on Standards releases its final report to the contracting agency, the head administrator will need to review the efforts of the original self-evaluation team, its review preparations and develop a corrective action plan and implementation schedule based on the auditor's recommendations. In some cases the agency may disagree with CEA and submit an appeal of the auditor's findings.

Specific Agency Audit Responsibilities

The agency should appoint a responsible person with authority and respect who will lead the agency through the preparation for an outside audit process. This person facilitates or develops a monitoring protocol by conducting meetings, writing reports and working through a chain of command in the agency.

The communication system needs to work from the top down and be truly interdepartmental. It must develop expectations, give feedback, monitor progress, establish timelines and schedules, identify and overcome obstacles and make recommendations which require action from the agency leadership as well as its departments and institutions. Finally, it will need to develop a filing system for each of the current 84 CEA standards. Since there are certain core standards which are systemwide the agency must distribute the central policy and procedures and develop new ones so that CEA standards will be met.

Specific CEA Audit Procedures

CEA sends an auditor trainer to the agency to train their staff in preparing for the audit. This is done early in the process to allow several months for the agency to prepare for the formal audit.

On the day of the institutional audit itself everything begins with a brief introductory entrance interview with the warden, program deputy, principal and or administrator. The primary contact person is introduced. This person should be immediately available throughout the audit to find anything the auditor needs. Next comes an institutional program area familiarization tour. The auditor receives an institution description describing the population and staffing pattern. All clearances and consents for access to areas and records are obtained in advance and are available. Any unusual situations, such as court orders are explained.

The auditor then goes to the room where all the files are collected and begins his or her review of policy and procedures. Each standard with policy and procedures and evidence of implementation are contained in separate files. The auditor will verify compliance, making notes on forms specifically developed by CEA. The auditor basically reviews all policy and procedures to find whether or not they have been implemented. Implementation can be supported by written documentation, oral interviews of staff and students

and visual inspection. The auditor selects files and implementation records to review. The agency staff do not choose the records.

Document review

The auditor reviews all pertinent documents which should be organized in the recommended fashion. If the files are poorly organized and preclude the auditor from finding material readily, it is his or her prerogative to postpone the audit. It is not the job of the auditor to organize the materials for the audit.

The auditor first looks for primary documents such as laws, executive directives or agency policy and procedures which govern and narrate the practice called for in the standard. Once the primary evidence has been identified and is deemed sufficient, the auditor looks for secondary evidence. This type of evidence demonstrates that the standard authorized with primary evidence has actually been implemented. Secondary evidence shows such things as action, usage or occurrence. Various kinds of documents are secondary such as student records, attendance sheets, school calendars, education plans for students, budget records and other items.

The auditor may go another step and look for tertiary evidence. This could include interviews with staff or students.

The burden of proof is on the agency to produce all levels of evidence. If things are missing from the file the agency can bring forth additional and existing documentation, but they cannot manufacture new proof or policy on the spot. Verbal documentation is insufficient except as tertiary evidence.

Auditor responsibilities

CEA auditors meet extensive minimum qualifications and are fully trained to know and apply standards. The auditor learns how to examine documents to justify compliance, how to interview staff and students, how to take accurate notes for compliance and non-compliance (especially the latter). If the auditor finds a standard to be in compliance he may say to the client agency. "Really great policy here!" However, the auditor must be much more specific on non-compliance by writing things such as, "The policy does not cover such and such", or "no evidence of implementation found in file".

The auditor audits the standards and performance objectives, not his or her belief about the quality of the materials presented. This is important because an auditor may feel policy and procedures in his or her agency are better than the agency being audited, but must not say so orally or in writing.

At the end of the audit the auditor presents the tentative findings in an exit interview. Commendations and general findings are given. Exceptions and non-compliance recommendations are covered. The auditor stipulates that all this is subject to review and final approval of the CEA Commission on Standards and is only the auditor's recommendations at this time.

The auditor then writes a report which is submitted to the CEA Executive Office. The report is kept confidential between CEA and the contracting agency.

Standards Interpretation

Standard interpretation is based on the literal meaning of standards and performance objectives alone. As mentioned earlier the interpretation is not based on an auditor's idea of how it is best done or how he or she does it at the home agency. If there is a problem with a standard the auditor will document everything and make a recommendation for a final determination of compliance from the CEA Committee on Standards.

The agency being audited can ask for exceptions by showing how a standard is not applicable to its particular situation. It is preferable to request exceptions or "not applicable" status ahead of time.

Since there is always room for interpretation in any audit, the agency may wish to dispute an auditor's finding of non-compliance. The agency must abide, however, by the final decision of the CEA Committee on Accreditation.

Once accredited the education program receives a three year accreditation from CEA which certifies that it meets the minimum standards set forth by CEA.

We are proud of the work that has been done by the members of the Correctional Education Association over the past ten years and hope that it will be taken seriously by jurisdictions outside North America. It may be that circumstances dictate the need for more standards or the elimination of old ones, but we feel that the current series reflects well on quality professional education practice in the juvenile and adult facilities in North America.

We developed these standards because we believe our mission is inherently different than public or private schools serving free children or adults. Correctional educators work in an environment of security as well as in an educational setting. Our students need skills and knowledge as well as new attitudes to become positive, contributing citizens, productive family members and diligent taxpaying workers. It is our belief that correctional education standards set the framework for the good work we all perform. Standards give us the power to do our jobs effectively and professionally.

Thank you for asking me to present to you at the IFEPS Conference in Adelaide.

“G’Day Mates” or in American terms, “Happy Trails to Y’all”.