



OFFICE OF THE STATE AUDITOR



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STATE AUDITOR

November 4, 2021

SEX OFFENDER MANAGEMENT BOARD PERFORMANCE AUDIT – STATUS REPORT

Members of the Legislative Audit Committee:

Attached is the status report from the Department of Public Safety (Department) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) *Sex Offender Management Board Performance Audit*.

OSA REVIEW OF DOCUMENTATION

As part of the status report process, we requested and received supporting documentation for each recommendation that the Department reported as having been implemented. Specifically, we reviewed the following documentation:

- Board policies and standard operating procedures, committee charters, and other written guidance.
- Revisions to and other documentation associated with the Standards and Guidelines for the Assessment, Evaluation, Treatment and Behavioral Monitoring of Adult Sex Offenders and the Standards and Guidelines for the Evaluation, Assessment, Treatment and Supervision of Juveniles Who Have Committed Sexual Offenses.
- Written legal guidance the Board obtained from the Attorney General's Office.
- Board meeting minutes.

Based on our review, the supporting documentation substantiates the Department's reported implementation status.

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AUDIT RECOMMENDATION STATUS REPORT

AUDIT NAME	Sex Offender Management Board performance audit
AUDIT NUMBER	1926P
AGENCY	Department of Public Safety
DATE OF STATUS REPORT	November 4, 2021

SECTION I: SUMMARY

REC. NUMBER	AGENCY'S RESPONSE	ORIGINAL IMPLEMENTATION DATE	CURRENT IMPLEMENTATION STATUS	CURRENT IMPLEMENTATION DATE
1-A	Agree	December 2020	Implemented	11/20/2020
1-B	Agree	June 2021	Implemented	08/20/2021
1-C	Agree	September 2020	Implemented	09/22/2020
2-A	Agree	December 2020	Implemented	11/20/2020
2-B	Agree	September 2020	Implemented	11/20/2020
2-C	Agree	December 2020	Implemented	11/20/2020
2-D	Agree	December 2020	Implemented	11/20/2020
3-A	Agree	December 2020	Implemented	11/20/2020
3-B	Agree	December 2020	Implemented	11/20/2020
3-C	Agree	September 2020	Implemented	11/20/2020
3-D	Agree	December 2020	Implemented	11/20/2020
3-E	Agree	September 2020	Implemented	11/20/2020
3-F	Agree	December 2020	Implemented	11/20/2020
3-G	Agree	September 2020	Implemented	11/20/2020
4-A	Agree	December 2020	Implemented	10/21/2020
4-B	Agree	December 2020	Implemented	11/20/2020
4-C	Agree	December 2020	Implemented	11/20/2020
4-D	Agree	December 2020	Implemented	01/15/2021
5-A	Agree	December 2020	Implemented	12/07/2020
5-B	Agree	December 2020	Implemented	12/07/2020
5-C	Agree	December 2020	Implemented	09/22/2020
5-D	Agree	December 2020	Implemented	09/22/2020
6-A	Agree	December 2020	Implemented	11/20/2020
6-B	Agree	December 2020	Implemented	11/20/2020

SECTION II: NARRATIVE DETAIL

RECOMMENDATION 1-A

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that the Standards and Guidelines for the Assessment, Evaluation, Treatment and Behavioral Monitoring of Adult Sex Offenders (Adult Standards) and the Standards and Guidelines for the Evaluation, Assessment, Treatment and Supervision of Juveniles Who Have Committed Sexual Offenses (Juvenile Standards) and its process to revise standards align with statutory requirements by:

- A. Implementing policies and procedures to guide the standards revision process, including (i) how committees should document their consideration of evidence; (ii) how committees should apply the Board’s evidence hierarchy when assessing available research, including how they should document that no relevant or reliable research is available; (iii) the extent to which meeting minutes should reflect committees’ deliberations about specific wording changes; (iv) which sections of the standards do not require supporting research; and (v) how the standards should inform readers of which sections are not based on evidence and why.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

The Board developed a research standard operating procedure (SOP) to be used by the Board and its Committees in deliberation related to the Standards revisions process. The research SOP directs the Board and its Committees on the use of research in the Standards revisions process, and this guidance addresses each of the items listed in the recommendation. Further, the Board developed Committee charters for each Committee in terms of the functioning of the Committee.

RECOMMENDATION 1-B

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that the Standards and Guidelines for the Assessment, Evaluation, Treatment and Behavioral Monitoring of Adult Sex Offenders (Adult Standards) and the Standards and Guidelines for the Evaluation, Assessment, Treatment and Supervision of Juveniles Who Have Committed Sexual Offenses (Juvenile Standards) and its process to revise standards align with statutory requirements by:

- B. Based on the policies and procedures implemented in response to PART A, revising the standards to clearly indicate, for each standard, which is evidence-based and which lacks supporting evidence, and why. Revisions could include adding footnotes, an appendix, and/or other explanatory language so readers can easily reference supporting evidence or understand why certain standards are not based on evidence.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	08/20/2021
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AGENCY UPDATE

The Board reviewed recently completed Standards revisions and assessed the evidence gathered in terms of its applicability to each section of the Standards (for older revised sections, the Board completed a new research review). The Board then completed a summary document for each section of the Standards highlighting which Standards are supported by research and which are not. This information is now included as a part of each section of the Standards and copies of the reference list will be accessible to the reader. All sections have been ratified by the Board as of August 20, 2021.

RECOMMENDATION 1-C

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that the Standards and Guidelines for the Assessment, Evaluation, Treatment and Behavioral Monitoring of Adult Sex Offenders (Adult Standards) and the Standards and Guidelines for the Evaluation, Assessment, Treatment and Supervision of Juveniles Who Have Committed Sexual Offenses (Juvenile Standards) and its process to revise standards align with statutory requirements by:

- C. Requiring the Best Practices Committee to have more substantial involvement in every standards revisions process.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	09/22/2020
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AGENCY UPDATE

The Board developed a standard operating procedure (SOP) for the Best Practices Committee that highlights the substantial involvement of the Committee in Standards revisions process. The Board also developed a Best Practices Committee charter to guide the work of the Committee.

RECOMMENDATION 2-A

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it approves only qualified providers to work with sex offenders by:

- A. Implementing processes, and changing Board policies as needed, to request and check references for first-time applicants to help assess their fitness to provide services. This could include, for example, accepting non-professional references, such as from the applicant's educational institution or community service.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	11/20/2020
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AGENCY UPDATE

The Board developed an Application Review Committee (ARC) application review Standard Operating Procedure (SOP) and an ARC charter. The SOP reviews the required process for application review including first-time applicants. The Application 1 process was also updated to require professional or non-professional letters of reference as part of the process.

RECOMMENDATION 2-B

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it approves only qualified providers to work with sex offenders by:

- B. Requiring staff to document, in the applicant's file, when they rely on work conducted by the Department of Regulatory Agencies (DORA) to satisfy the Board's requirements. As needed, the Board should modify its policies to reflect when and how staff may rely on work conducted by DORA to confirm an applicant met the Board's qualification requirements.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	11/20/2020
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AGENCY UPDATE

The Board developed an Application Review Committee (ARC) application review standard operating procedure (SOP) and an ARC charter. The SOP reviews the required process for application review including staff to verify first-time applicant education requirements to satisfy Board requirements, and no longer rely on DORA for this information. A checklist has been developed to track required information and all application review work is documented in the provider data management system.

RECOMMENDATION 2-C

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it approves only qualified providers to work with sex offenders by:

- C. Implementing processes to ensure that Division staff and the Application Review Committee review and verify applicants' qualifications, and document their completion of this review, prior to approving the applicants for inclusion on the Approved Provider List. This should include verification and documentation of required training, work product examples, evidence of work with specific populations, and completed supervision agreements.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) application review standard operating procedure (SOP) and an ARC charter. The SOP reviews the required process for application review including applications where training, work product, experience with specific populations, and supervision agreements are required. An application staff checklist has been developed to track required information for each application type, and all application review work is document in the provider data management system.

RECOMMENDATION 2-D

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it approves only qualified providers to work with sex offenders by:

- D. Implementing a process for the Board and Division to evaluate requirements that may be unrealistic and modifying or removing those requirements as needed.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

The Board has reviewed and will continue to regularly review the Application Review Committee (ARC) application review standard operating procedure (SOP), and updated the requirements that were unrealistic, and modified or removed those requirements through the SOP and application requirements.

RECOMMENDATION 3-A

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- A. Accept anonymous complaints and carry out review or investigative actions to the extent such complaints contain sufficient information to do so. Alternatively, if the Board believes that no anonymous complaints should be addressed and does not agree to change its policy to include these complaints, it should seek statutory change to exempt the Board from this responsibility.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) complaint process standard operating procedure (SOP) and Committee charter. The SOP specifies the receipt and review of all complaints including anonymous complaints. The complaint form and process have also been modified to allow for anonymous complaints.

RECOMMENDATION 3-B

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- B. Define or explain what constitutes a complaint that: (i) has not been completed properly or does not contain sufficient information, to guide staff's initial review of complaints, and (ii) sufficiently alleges a standards violation, to guide the Application Review Committee in its early review process.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) complaint process standard operating procedure (SOP) and Committee charter. The SOP explains what constitutes a complaint including whether it has been completed properly or does not contain sufficient information, and what the criteria is for sufficiently alleging a complaint. The SOMB Provider Administrative Policies also provide information to complainants and providers on the complaint process. The SOMB Bylaws provide information on the way in which the ARC conducts its business.

RECOMMENDATION 3-C

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- C. In instances when a complaint is deemed to have insufficient information, notify complainants and allow them the opportunity to provide additional information prior to dismissal.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) complaint process standard operating procedure (SOP) and Committee charter. The SOP identifies what happens if a complaint does not have sufficient information, the request for additional information, and notifying the complainant what will happen if additional information is not provided.

RECOMMENDATION 3-D

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- D. Include guidance on the minimum type and amount of information the Application Review Committee should obtain to come to a determination on a complaint.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) complaint process standard operating procedure (SOP) and Committee charter. The SOP identifies what information is necessary to sufficiently allege a complaint in order for ARC to proceed with a review of the complaint and make a final determination.

RECOMMENDATION 3-E

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- E. Establish a clear sequence of steps the Application Review Committee must follow in managing complaints, as well as any activities the committee may take at its discretion.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

11/20/2020

AGENCY UPDATE

The Board updated its SOMB Provider Administrative Policies to identify the clear sequence of events that will occur within a complaint investigation including initial staff review, ARC review, and what options the ARC has for an outcome during its review.

RECOMMENDATION 3-F

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- F. Specify (i) that all parties must be involved in negotiating the terms of a mutual agreement (i.e., the complainant, provider, and Board); (ii) the circumstances that would prompt an effort to resolve a complaint through agreement; (iii) what information mutual agreements should contain, such as the types of corrective actions that might be suitable for an agreement; and (iv) how the public will be made aware of a provider's standards violations and the action taken to correct these violations.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) complaint process standard operating procedure (SOP) and Committee charter. The SOP identifies terms of the mutual agreement including that both parties must agree to the mutual agreement and what information will be made public as part of the mutual agreement. In preparing for this review, it was noted that the SOMB Provider Administrative Policies do not comport with the SOP in terms of public disclosure of the mutual agreement, and this was resolved at the August 20, 2021 SOMB meeting.

RECOMMENDATION 3-G

The Sex Offender Management Board (Board), within the Department of Public Safety, should strengthen its complaints handling process to comply with statute and implement adequate controls to ensure fairness and consistency by implementing revised written policies to:

- G. Require staff and committee members to document their activities in dealing with complaints, including the basis for decisions and actions such as dismissing a complaint, seeking a resolution through agreement, and how the terms of an agreement address a provider's lack of compliance with the Standards and Guidelines for the Assessment, Evaluation, Treatment and Behavioral Monitoring of Adult Sex Offenders (Adult Standards) or the Standards and Guidelines for the Evaluation, Assessment, Treatment and Supervision of Juveniles Who Have Committed Sexual Offenses (Juvenile Standards).

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

11/20/2020

AGENCY UPDATE

The Board developed an Application Review Committee (ARC) complaint process standard operating procedure (SOP) and Committee charter. The SOP identifies how the staff of the SOMB will document the findings of the complaint process including the basis for decisions and actions through meeting minutes, correspondence, and the provider data management system. The SOMB Provider Administrative Policies provide information regarding the complaint process.

RECOMMENDATION 4-A

The Sex Offender Management Board (Board), within the Department of Public Safety, should improve its controls over the identification and management of conflicts of interest among its members by:

- A. Obtaining a written legal opinion from the Attorney General that clarifies how the State Code of Ethics applies to Board members, including (i) what types of official actions constitute use of the Board's discretionary authority, (ii) employment situations that create financial interests for members, (iii) whether a supervisory relationship must exist for Board members to have a conflict involving providers who work for the same organization, and (iv) whether Board members who are state employees have financial interests that could create conflicts.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

10/21/2020

AGENCY UPDATE

The Board obtained a written legal opinion from the Attorney General that clarifies how the State Code of Ethics applies to Board members. The SOMB highlighted its response to the written legal opinion in an audit response memo.

RECOMMENDATION 4-B

The Sex Offender Management Board (Board), within the Department of Public Safety, should improve its controls over the identification and management of conflicts of interest among its members by:

- B. Based on the legal opinion obtained in response to PART A, implementing written guidance that provides specific examples of how statutory definitions and provisions apply to the Board (e.g., official acts, direct economic benefits, businesses or other undertakings, and financial interests) to help members identify when they have conflicts, or the potential appearance of conflicts, that should be disclosed.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

Based on the results of the written legal opinion from the Attorney General, the Board reviewed its Bylaws and Conflict of Interest Policy to implement the written guidance that provides specific examples of how statutory definitions and provisions apply to the Board to help members identify when they have conflicts of interest. In addition, a frequently asked questions document was prepared for Board members to provide them with practical guidance on conflicts of interest.

RECOMMENDATION 4-C

The Sex Offender Management Board (Board), within the Department of Public Safety, should improve its controls over the identification and management of conflicts of interest among its members by:

- C. Revising the bylaws and/or conflicts of interest policy to ensure that both contain clear, precise, and consistent direction related to (i) which provisions of the State Constitution and statutes apply to Board members, (ii) what types of actions are considered to be the exercise of “discretionary authority,” (iii) what types of situations are considered other undertakings that members should consider when identifying conflicts, (iv) what is meant by the terms “direct” and “substantial” when referring to direct economic benefits, (v) whether members are required to abstain from voting when the appearance of a conflict exists, and (vi) whether Board members can be present and answer questions during discussions of matters with which they have conflicts.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

11/20/2020

AGENCY UPDATE

Based on the results of the written legal opinion from the Attorney General, the Board reviewed its Bylaws and Conflict of Interest Policy to implement the written guidance that address i-vi above. In addition, a frequently asked questions document was prepared for Board members to provide them with practical guidance on conflicts of interest.

RECOMMENDATION 4-D

The Sex Offender Management Board (Board), within the Department of Public Safety, should improve its controls over the identification and management of conflicts of interest among its members by:

- D. Expanding the bylaws or policy to identify responsible parties and processes for (i) ensuring that Board members submit the required annual disclosures, (ii) communicating the annual disclosures to the entire Board, and (iii) reminding Board members during meetings to disclose their conflicts.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

01/15/2021

AGENCY UPDATE

The Board revised its Conflict of Interest Policy and Bylaws to ensuring that Board members submit their annual required disclosures, communicate their annual disclosures to the entire Board, and remind members during meetings to disclose their conflicts. Sample minutes from Board meetings demonstrate the Board meeting this requirement.

RECOMMENDATION 5-A

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it has effective controls over the funding allocations it recommends from the Sex Offender Surcharge Fund (Surcharge Fund) by:

- A. Implementing processes for the Allocation Committee to use more comprehensive financial information to inform its proposed allocations, such as by asking agencies to submit written requests or statements related to their need for allocations, provide some historical expenditure information, and offer a rationale for the amount of funds needed.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

12/07/2020

AGENCY UPDATE

The Board developed a Sex Offender Surcharge Allocation Committee standard operating procedure (SOP) and charter, and the SOMB Bylaws were updated to provide formal requirements for the work of the Board and Committee in making proposed allocations of the funds. A Sex Offender Surcharge Allocation Form has been developed for each impacted agency to provide the required information.

RECOMMENDATION 5-B

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it has effective controls over the funding allocations it recommends from the Sex Offender Surcharge Fund (Surcharge Fund) by:

- B. Seeking guidance from Joint Budget Committee staff about the process to request increased spending authority, and sharing that guidance with agencies that receive money from the Surcharge Fund to help ensure that their annual budget requests align with the Board's recommended allocation amounts.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

12/07/2020

AGENCY UPDATE

The Board staff met with Department financial staff and a Joint Budget Committee staff member on August 27, 2020. The staff member advised the Board that the Board could make spending allocation recommendations independent of any requests for changes in spending authority from the agencies receiving the funds. The Sex Offender Surcharge Allocation Committee was updated on this advisement and will make recommendations for decisions on spending in the future based on identified need rather than being limited by Department requests for spending authority.

RECOMMENDATION 5-C

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it has effective controls over the funding allocations it recommends from the Sex Offender Surcharge Fund (Surcharge Fund) by:

- C. Directing staff to seek guidance from the Office of the State Controller on accessing accounting data about the Surcharge Fund, including annual reversion amounts, and provide that information to the Board and/or Allocation Committee. The Board should then use that information for analysis as part of the Board's annual decision-making process.

**CURRENT
IMPLEMENTATION
STATUS**

Implemented

**CURRENT
IMPLEMENTATION
DATE**

09/22/2020

AGENCY UPDATE

The Departmental Budget Director spoke with the Office of the State Controller on June 11, 2020. Information from this conversation is contained in a Departmental Memo, and this data and the process to obtain this data is highlighted in the Sex Offender Surcharge Allocation Committee standard operating procedure (SOP). The accounting data about the Surcharge Fund, including annual reversion amounts, was provided to the Board during its decision-making regarding the funding allocation at its September 17, 2021 meeting, and the Board will be provided this information per SOP for all subsequent funding decisions.

RECOMMENDATION 5-D

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it has effective controls over the funding allocations it recommends from the Sex Offender Surcharge Fund (Surcharge Fund) by:

- D. Establishing a target fund balance in writing and tracking against that benchmark.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

09/22/2020

AGENCY UPDATE

The SOMB Sex Offender Surcharge Allocation Committee established a minimum target fund balance at its meeting on August 20, 2020. This information was then shared with and supported by the SOMB at its meeting on August 21, 2020, and incorporated into the SOMB Sex Offender Surcharge Allocation Committee standard operating procedure (SOP). In addition, information on the functioning the Committee are identified in the Committee charter and SOMB Bylaws. The Board considered the minimum target fund balance as part of the funding allocation recommendation made at the September 17, 2021 meeting, and will review the minimum target fund balance for all subsequent funding decisions.

RECOMMENDATION 6-A

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it documents all formal votes regarding public policy recommendations and decisions regarding sex offenders in a manner that is transparent to the public and complies with open meetings laws by:

- A. Revising and implementing the Board’s bylaws to specify that tallies of individual votes and clear references to the specific voting positions of individual members present, rather than only final decisions, must appear in full Board and committee meeting minutes.

CURRENT IMPLEMENTATION STATUS

Implemented

CURRENT IMPLEMENTATION DATE

11/20/2020

AGENCY UPDATE

The SOMB revised its Bylaws to identify the recording of individual votes for the Board and all Committees where there are appointed members, as well as a consensus decision-making model to be used where possible. The SOMB Application Review Committee, Sex Offender Surcharge Allocation Committee, Best Practices Committee, and SOMB Executive Committee charters were developed to identify the decision-making process.

RECOMMENDATION 6-B

The Sex Offender Management Board (Board), within the Department of Public Safety, should ensure that it documents all formal votes regarding public policy recommendations and decisions regarding sex offenders in a manner that is transparent to the public and complies with open meetings laws by:

- B. Revising and implementing the Board’s bylaws to specify which Division staff or Board members are responsible for ensuring all minutes from full Board and committee meetings contain complete voting information and provide the public a transparent record of its policy recommendations and decisions.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	11/20/2020
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AGENCY UPDATE

The SOMB revised its Bylaws to identify the recording of individual votes by staff for the Board and all Committees where there are appointed members, as well as a consensus decision-making model to be used where possible. The SOMB Application Review Committee, Sex Offender Surcharge Allocation Committee, Best Practices Committee, and SOMB Executive Committee charters were developed to identify the decision-making process.