



Stage 1 Business Analysis

California Department of Technology, SIMM 19A.2 (Rev. 2.5, July/2021)

1.1 General Information

Agency or State Entity Name: Corrections and Rehabilitation

If agency/state entity not in list, then enter here. [Click or tap here to enter text.](#)

Organization Code: 5225

Proposal Name: Incarcerated Persons Tracking

Proposal Description: The CDCR proposes to implement a modern, enterprise level incarcerated persons tracking solution as a proactive measure to address concerns of the courts pertaining to Armstrong plaintiffs and Americans with Disabilities Act (ADA) compliance, and thereby mitigate risks of Non-Compliance. The proposed solution will be used to perform compliance surveys, measure/monitor/report ADA compliance metrics, and track/monitor incarcerated persons through improved and automated processes. The proposed solution will be to develop a Web-based enterprise solution which aims at replacing existing standalone (non-enterprise/non-standard) manual paper processes with an automated one. The proposed solution primarily includes both hardware and software components, which makes use of state-owned rugged mobile device, such as a cell phone or tablet, to collect information relating to incarcerated persons, ADA monitoring and compliance.

When do you want to start the project? 9/6/2022

Department of Technology Project Number (0000-000): [5225-175](#)

1.2 Submittal Information

Contact Information

Contact First Name: Jeffery

Contact Last Name: Funk

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Contact Phone Number: (916) 764-6853

Submission Date: 11/12/2021

Version Number: 1.1

Project Approval Executive Transmittal – (Attach Transmittal to the email submission.)

1.3 Business Sponsorship

Add additional Executive Sponsors or Business Owners as needed.

Executive Sponsors

Title: Undersecretary

First Name: Jennifer

Last Name: Barretto

Business Program Area: (Name of the business program area represented by the Executive Sponsor(s))

Administration

Title: Undersecretary

First Name: Jeffrey

Last Name: Macomber

Business Program Area: (Name of the business program area represented by the Executive Sponsor(s))

Operations

Title: Director

First Name: Kristin

Last Name: Montgomery

Business Program Area: (Name of the business program area represented by the Executive Sponsor(s))

Enterprise Information Services (EIS)

Business Owners

Title: Director

First Name: Kristin

Last Name: Montgomery

Business Program Area: (Name of the business program area represented by the Executive Sponsor(s))

Enterprise Information Services (EIS)

Title: Director

First Name: Connie

Last Name: Gipson

Business Program Area: (Name of the business program area represented by the Executive Sponsor(s))

Division of Adult Institutions (DAI)

Title: Deputy Director (A)

First Name: Jared

Last Name: Lozano

Business Program Area: DAI

Title: ITM II

First Name: Jeffery

Last Name: Funk

Business Program Area: EIS

Program Background and Context

In a series of Federal Court orders stemming back to the 1990s, the court found CDCR's treatment of prisoners violated basic rights related to Mental Health treatment (Coleman vs. Newsom), the constitutional adequacy of CDCR's medical care system (Plata v. Newsom), the treatment of Developmentally Disabled inmates (Clark vs. Newsom), and inmates covered by the Americans with Disabilities Act (ADA) (Armstrong vs. Newsom). For Clark and Armstrong lawsuits, the Department entered into agreed upon remedial plans and developed policy and procedures to achieve compliance. For the Coleman lawsuit, the Department established the Mental Health Services Delivery System (MHSDS). For Plata, compliance issues associated with the 2002 stipulation led to the appointment of a federal Receiver in February 2006.

One of CDCR's most critical functions is tracking services provided to incarcerated persons. Many of the current tracking processes require custody and non-custody staff to capture information on paper and on legacy outdated systems and either transpose that data into the Strategic Offender Management System (SOMS) or other CDCR IT solutions, or maintain it permanently in paper form. Additionally, CDCR institutions implement paper processes differently, thus there are many different manual processes for capturing the same information and storing the data. Accuracy of the data is reliant on each individual collector and not readily available for responses to the court or plaintiff attorneys leaving the Department vulnerable or with the appearance of non-compliance. CDCR is proposing to implement an Information Technology tool to replace the currently outdated legacy system and manual paper processes. Additional use cases that could potentially be included in the

solution could be tracking durable medical equipment, meal-tracking, inmate welfare checking, automation of 114A and attendance tracking.

As a proactive measure to address concerns raised by Armstrong plaintiffs tied to a recent court order in the Armstrong v. Newsom case, CDCR requested and was approved funding in a Budget Change Proposal to implement a solution to record and track ADA survey findings of non-compliance through resolution and provide accurate near-real-time reporting. Currently, data requests from plaintiffs and other stakeholders are distributed to the various missions for responses. Typically, auditing teams are dispersed to rifle through paper files at the institutions to compile the data necessary to provide responses. This is a time consuming arduous process resulting in delivery of inaccurate or incomplete data.

CDCR intends to address its surveying and monitoring of ADA compliance in its initial deployment of a new solution. However, there are other business problems that the Department believes this solution could address in the future should funding become available.

Potential Future Opportunities:

Welfare Checks: A report filed by Coleman Special Master Keating in May 2006, regarding suicides completed in the CDCR in calendar year 2004 (May 9, 2006 Final Suicide Report) indicated that 69.2 percent of incarcerated persons suicides committed in CDCR during the 2004 calendar year occurred in the Administrative Segregation Units (ASU). Upon release of this statistical data, plaintiff's attorneys in Coleman v. Brown requested a plan outlining the steps necessary to reduce the incarcerated person suicide rate. As a result, the State implemented the Inmate Welfare Check System (IWCS) with a product named Guard 1 to track and report on rounds conducted not greater than every 35 minutes. This system is currently used in all Administrative Segregation Unit (ASU), Psychiatric Services Unit (PSU), Security Housing Unit (SHU), and Condemned Housing Units. The proprietary equipment used with this system has presented some challenges since the implementation in 2014. Problems with equipment result in staff manually tracking Security/Welfare checks.

Automation of incarcerated persons Segregation Records: Documentation of required ASU functions was not being consistently applied in accordance with the October 2, 2006 memorandum titled, "Plan to Reduce Suicide Risk in Administrative Segregation Units". Therefore, custody supervisors are now required to complete a weekly manual review/calculation of services offered to all incarcerated persons housed in Segregation. Various stakeholders request and have access to the manual data and have questioned the validity and reliability. An automated tracking system will ensure the data is accurately tracked and calculated and the report will be automated, saving staff time and reducing errors.

Meal Tracking: The Department is responsible for making a reasonable effort, by law, to accommodate meals upon request for incarcerated persons with any religious, personal, or ethical dietary need. However, incarcerated persons continue to manipulate the current process to acquire multiple meals as well as meal types that have not been approved for them. The Department lacks the ability to quickly identify whether an incarcerated person is collecting the appropriate meal or whether they are collecting more than one. This manipulation is significantly increasing food costs, and at times, resulting in meal shortages as incarcerated persons have to ability to be selective of their meal choice since there is not a consistent tracking method to enforce meal assignment.

Attendance Tracking: The current manual methods and processes used for tracking time and incarcerated person participation in credit-earning programs are not working well with respect to accuracy and fairness. A review of numerous institutions revealed that the methods and rules for obtaining and recording incarcerated person participation times have material differences between institutions, programs, instructors, sponsors, and so on. It was observed that the methods and rules were not uniformly understood, performed, or prioritized. Because manual processes allow for more errors, it is possible that incarcerated persons could get released later than they should due to inaccurate tracking. Any erroneous early or late release of incarcerated persons betrays CDCR's mission to enhance public safety. It also conflicts with CDCR's goal to achieve organizational excellence in our operations and systems.

Asset Tracking: In 2019, there were 316 allegations of non-compliance due to missing Durable Medical Equipment (DME). Each allegation requires an inquiry requiring a supervisor to conduct interviews and determine the validity of the allegation. This solution will 'tie' assigned DME and Reasonable Accommodation items to the offender. This will allow for validation that items in the offender's possession are appropriate and not mistakenly taken away, greatly reducing the amount of allegations related to missing DME. It will also ensure required equipment is transported along with the offender.

1.4 Stakeholders

Key Stakeholders

(Stakeholder" are individuals or groups impacted by the business processes addressed by the proposed project)

Organization Name: DAI

Stakeholder Name: Connie Gipson

Stakeholder Internal or External? Internal

When is the Stakeholder Impacted?

Input to Business Process: Yes

During Business Process: Yes

Output of Business Process: Yes

How are Stakeholders impacted? (Describe how the stakeholder is involved in the process)

DAI administers and oversees all processes for the tracking of Incarcerated persons in CDCR institutions.

How will the Stakeholder participate in the project? (Describe how the stakeholder will be involved in the project)

DAI management and staff will serve as subject matter experts, providing input into the business case and justification.

Organization Name: EIS

Stakeholder Name: Kristin Montgomery

Stakeholder Internal or External? Internal

When is the Stakeholder Impacted?

Input to Business Process: No

During Business Process: Yes

Output of Business Process: No

How are Stakeholders impacted? (Describe how the stakeholder is involved in the process)

EIS supports the CDCR technology solutions, network and infrastructure.

How will the Stakeholder participate in the project? (Describe how the stakeholder will be involved in the project)

EIS staff will provide the technical expertise needed to plan, implement and support the solution.

TIP: Copy and paste to add Stakeholders as needed.

1.5 Business Program

Organization Name: DAI

Business Program Name: Division of Adult Institutions

When is the unit impacted?

Input to the Business Process: Yes

During the Business Process: Yes

Output of the Business Process: Yes

How is the business program unit impacted? (Describe how the business program unit will be involved in the project)

DAI has been proactive in their response to the court's concerns and has already developed new policies and procedures to support the deployment of this solution for ADA compliance auditing, labor notifications have been processed, and they have implemented into their operations a temporary standalone solution at the six institutions where the courts expressed greatest concern. DAI received staffing through the BCP process in support of this program. DAI staff are assisting in the development of the business requirements, and will participate in testing the solution, training and statewide implementation.

How will the business program unit participate in the project?

Custody Staff will assist with defining requirements and testing the end product.

TIP: Copy and paste to add Business Programs as needed.

1.6 Business Alignment

Business Driver(s)

Financial Benefit: No

Increased Revenue: No

Cost Savings: No

Cost Avoidance: No

Cost Recovery: No

Mandate(s): Choose an item.

Improvement

Better Services to Citizens: No

Efficiencies to Program Operations: Yes

Improved Health and/or Human Safety: Yes

Technology Refresh: Yes

Security

Improved Information Security: Yes

Improved Business Continuity: Yes

Improved Technology Recovery: Yes

Technology End of Life: No

Strategic Business Alignment

Strategic Plan Last Updated: 1/1/2016

Strategic Business Goal: P.38 Improvements in Accessibility, Health Care, and Programming Space.

Alignment: This proposal improves the mechanism for ensuring ADA compliance for incarcerated persons.

Strategic Business Goal: P. 38 The Department has developed and implemented a number of facility improvement projects that when complete will provide greater accessibility, improve the delivery of health care, and create additional space to conduct rehabilitative programming.

P. 52 The safety and security of the Department's institutions is of paramount importance. Safe operation of the Department's facilities fosters a positive atmosphere that promotes rehabilitation. High programming facilities create better working conditions for staff and better living conditions for incarcerated persons. The Department is regularly challenged to maintain safe and secure prisons, and continues to refine and expand methods that improve the safety and security of the prisons to protect incarcerated persons, staff, and the public.

Alignment: This proposal improves the identification and tracking of ADA compliance issues and resolution of open matters, therefore providing greater accessibility and a safer environment for the delivery of services. In addition, this automated solution exemplifies best practices through data integration, standardization and collective reporting and is in alignment with the State's goal of standardizing business practices through the use of Information Technology. Accurate reporting is essential to successful management of the CDCR business operations.

Executive Summary of the Business Problem or Opportunity:

With each court order, CDCR develops ways to comply with the multitude of lawsuits, some of which occurred prior to the advent of information technology hardware/software with the necessary capability to capture and store the necessary data. The CDCR has conducted research and found solutions successfully implemented at other correctional entities nationwide. As a pro-active measure, CDCR proposes to deploy a technology solution

to replace the short-term survey tool and antiquated multiple paper tracking processes currently in place, which have proven to be inefficient, at times are illegible, and are not easily accessible for reporting.

The proposed solution will use modern technologies to collect information relating to incarcerated person tracking. The solution will standardize the data captured, monitoring, resolution and compliance reporting across all institutions and will enable the CDCR to quickly identify and resolve issues. The proposed solution will also allow the CDCR to report on various types of ADA compliance in near real-time, across all the institutions and with far greater accuracy.

Business Problem/Opportunities and Objectives List

Business Problem/Opportunity ID: 1

Business Problem/Opportunity Description:

Currently, the Department tracks ADA compliance using paper processes, with the exception of six institutions which use a temporary solution that was built in-house as a quick, but not scalable enterprise solution. Automated record keeping serves the Department in mitigating exposure to litigation through the implementation of defensible metrics and the use of enhanced quality management tools. The Department is subjected to quarterly ADA compliance audits (Joint Audits) as a result of the Armstrong and Coleman lawsuits. One of the outcomes of these audits is the Compliance Rating which is derived based on these audits. Currently, the Compliance ratings are low and litigation ensues due to non-compliance.

Objective ID: 1.1

Objective:

Identify ADA issues of non-compliance in a timelier manner in order to resolve quickly and at the lowest level. Improve audit compliance score by an average of 25% by end of Year 1 after statewide implementation and achieve an audit Compliance score of 100% by end of Year 2. Note: Quarterly audits are conducted for a group of institutions in a sequential manner and throughout the year as per Joint Audit Schedule. However, it is important to note that not all institutions will have the benefit of new improved solution depending on time of the audits and timing of solution implementation during Year 1.

Metric: New Compliance score (Average) = Current Compliance score plus 25% by end of year 2023, Average Compliance score = 100% by end of year 2024

Baseline: Latest or current statewide Audit Compliance score for that institution – compliance scores will be noted at the end of each audit and used in the calculation above. The data is not readily available and will take time to collect. Collection will be completed prior to the 1 year target for comparison.

Target: Improved Compliance score of 25% by end of Year 1 after statewide implementation and achieve an audit compliance score of 100% by end of Year 2.

Measurement Method: New statewide Audit Compliance score divided by previous year score.

Business Problem/Opportunity ID: [1.2](#)

Business Problem/Opportunity Description: The Department faces ongoing ADA non-compliance issues and needs a method to determine reasons and/or factors influencing these issues. In the absence of an enterprise wide data driven solution with a means to identify all these factors affecting level of compliance, the department would find it difficult to find a resolution to the issues and improve compliance.

Objective ID: 1.2

Objective: Use data collected through the solution and analyze to assist the department in determining the reasons for ongoing non-compliance and audit compliance score less than 100%.

Metric: Identify and list all factors influencing the 100% Audit Compliance score.

Baseline: Latest or current statewide Audit Compliance score for that institution – compliance scores will be noted at the end of each audit and used in the calculation above. The data is not readily available and will take time to collect. Collection will be completed prior to the 1 year target for comparison.

Target: Identify all factors to mitigate issues/risks of non-compliance and achieve a 100% Audit Compliance score

Measurement Method: New statewide Audit Compliance score divided by previous year score.

TIP: Copy and paste to add Problem/Opportunities and/or related Objectives as needed.

TIP: Each Problem/Opportunity statement must have at least one Objective.

Project Approval Lifecycle Completion and Project Execution Capacity Assessment

1. Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants or financial) with other priorities within the agency/state entity (projects, PALs, or programmatic/technology workload)?

Answer (yes or no): Yes

2. Does the agency/ state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

Answer (No, New, Existing, or Both): Both New and Existing Processes

1.7 Project Management

(Attach a completed [Statewide Information Management Manual \(SIMM\)](#) Section 45 Appendix A to the email submission.)

Existing Data Governance and Data

1. Does the agency/state entity have an established data governance body with well-defined roles and responsibilities to support data governance activities?

Answer (Unknown, Yes, No, Clear): Yes

If Yes, include the data governance organization chart as an attachment to your email submission.

2. Does the agency/state entity have data governance policies (data policies, data standards, etc.) formally defined, documented, and implemented?

Answer (Unknown, Yes, No, Clear): Yes

If Yes, include the data governance policies as an attachment to your email submission.

3. Does the agency/state entity have data security policies, standards, controls, and procedures formally defined, documented, and implemented?

Answer (Unknown, Yes, No, Clear): Yes

If Yes, attach the existing documented security policies, standards, and controls used to your email submission.

ISO security policies are in DOM section 49020. Draft DOM Article 44 are also in review.

4. Does the agency/state entity have user accessibility policies, standards, controls, and procedures formally defined, documented, and implemented?

Answer (Unknown, Yes, No, Clear): Yes

If Yes, attach the existing documented policies, accessibility governance plan, and standards used to the email submission.

Accessibility policies are on the CDCR internet website: <https://www.cdcr.ca.gov/accessibility/>

If Yes, include the data migration plan as an attachment to your email submission.

5. If data migration is required, please rate the quality of the data.
Select data quality rating: Not Applicable

1.8 Criticality Assessment

Business Criticality

Legislative Mandates: No

Bill Number(s)/Code(s): [Click or tap here to enter text.](#)

Language that includes system relevant requirements: [Click or tap here to enter text.](#)

TIP: Copy and paste to add Bill Numbers/Codes and relevant language.

Business Complexity Score: 1.9

(Attach a completed [SIMM](#) Section 45 Appendix C to the email submission.)

Noncompliance Issues: Indicate if your current operations include noncompliance issues and provide a narrative explaining how the business process is noncompliant.

Programmatic regulations: No

HIPAA/CIIS/FTI/PII/PCI: No

Security: No

ADA: Yes

Other: No

N/A: No

Noncompliance Description:

Most violations identified in the Armstrong class action lawsuit involved failures to provide reasonable accommodations to class members, such as denying class members alternative handcuffing methods, wheelchairs, and additional time to enter or leave a cell or facilities or equipment to assist with disabilities is not present or in need of repair. Also, a denial of reasonable accommodations in violation of the ADA can take place where a law enforcement officer could have used less force or no force during the performance of his law-enforcement duties with respect to a disabled person. The policies, procedures, and monitoring mechanisms currently in place at most institutions, despite recent modifications made by CDCR, have proven to be inefficient at curbing reports of violations. There has been a noticeable improvement at the six institutions where CDCR has implemented the temporary standalone ADA survey application. The increased staffing and the current policies and procedures have already proven to be inefficient at bringing CDCR closer to compliance per the court directive.

Additional Assessment Criteria

1. What is the proposed project Implementation start date? 8/23/2021
2. Is this proposal anticipated to have high public visibility? No
If “Yes”, then please identify the dynamics of the anticipated high visibility below:
[Click or tap here to enter text.](#)
3. If there is an existing Privacy Threshold Assessment/Privacy Information Assessment, then include as an attachment to your email submission.
4. Does this proposal affect business program staff located in multiple geographic locations? Yes

If Yes, provide an overview of the geographic dynamics below and enter the specific information in the space provided.

Statewide Institutions

City Various State: California

Number of locations: All adult institutions

Approximate number of Staff: 400

TIP: Copy and paste to add Locations as needed.

1.9 Funding

1. Does the agency/state entity anticipate requesting additional resources through a budget action to complete the project approval lifecycle?

Answer (Yes, No, Clear): No

2. Will the state possibly incur a financial sanction or penalty if this proposal is not implemented?

Answer (Yes, No, Clear): Yes

If yes, please identify the financial impact to the state:

There is the potential for other ADA compliance court orders.

FUNDING SOURCE

FUND AVAILABILTY DATE

General Fund: [Choose an item.](#)

[Click or tap to enter a date.](#)

Special Fund: [Choose an item.](#)

[Click or tap to enter a date.](#)

Federal Fund: [Choose an item.](#)

[Click or tap to enter a date.](#)

Reimbursement: [Choose an item.](#)

[Click or tap to enter a date.](#)

Bond Fund: [Choose an item.](#)

[Click or tap to enter a date.](#)

Other Fund: [Choose an item.](#)

[Click or tap to enter a date.](#)

If "Other Fund" is selected, specify the funding source: [Click or tap here to enter text.](#)

1.10 Reportability Assessment

1. Does the agency/state entity's IT activity meet the definition of an IT Project found in the [State Administrative Manual \(SAM\)](#) Section 4819.2?

Answer (Yes, No, Clear): Yes

If No" this initiative is not an IT project and is not required to complete the Project Approval Lifecycle. ([Reportable Project Decision Tree \(RPDT\) Reference Guide](#), Reference R1.)

2. Does the activity meet the definition of Maintenance or Operations found in [SAM](#) Section 4819.2?

Answer (Yes, No, Clear): No

If Yes, this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report and provide an explanation below:

[Click or tap here to enter text.](#)

3. Has the project/effort been previously approved and considered an ongoing IT activity identified in [SAM](#) Section 4819.2, 4819.40? **NOTE:** Requires a Post Implementation Evaluation Report (PIER) submitted to the CDT.

Answer (Yes, No, Clear): No

If Yes, this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.

4. Is the project directly associated with any of the following as defined by [SAM](#) Section 4812.32? Includes single-function process-control systems; analog data collection devices, or telemetry systems; telecommunications equipment used exclusively for voice communications; Voice Over Internal Protocol (VOIP) phone systems; acquisition of printers, scanners and copiers.

Answer (Yes, No, Clear): No

If Yes, this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.

5. Is the primary objective of the project to acquire desktop and mobile computing commodities as defined by [SAM](#) Section 4819.34, 4989 ([RPDT Reference Guide](#), References R8)?

Answer (Yes, No, Clear): No

If Yes, this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity. Submit a copy of the completed, approved Stage 1 Business Analysis to the CDT and track the initiative on the Agency Portfolio Report.

6. Does the Project meet all of the criteria for Commercial-off-the-Shelf (COTS) Software and Cloud Software-as-a-Service (SaaS) delegation as defined in [SAM](#) Section 4819.34, 4989.2, and [SIMM](#) Section 22? ([RPDT Reference Guide](#), Reference R9.)

Answer (Yes, No, Clear): No

If Yes, this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity; however, submit an approved [SIMM](#) Section 22 COTS/SaaS Acquisition Information Form to the CDT.

7. Will the project require a Budget Action to be completed?

Answer (Yes, No, Clear): No

8. Is it anticipated that the project will exceed the delegated cost threshold assigned by CDT as identified in [SIMM](#) Section 15 Departmental Project Cost Delegation?

Answer (Yes, No, Clear): Yes

9. Are there any previously imposed conditions place on the state entity or this project by the CDT (e.g. Corrective Action Plan)?

Answer (Yes, No, Clear): No

If Yes, provide the details regarding the conditions below: [Click or tap here to enter text.](#)

10. Is the system specifically mandated by legislation?

Answer (Yes, No, Clear): No

Department of Technology Use Only

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Form Disposition: [Approved](#)

If Other, specify: [Click or tap here to enter text.](#)

Form Disposition Date: [10/31/2022](#)