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April 2016

Donnell Boyden, Chair
Members of the Legislature
Cortland County
60 Central Avenue
Cortland, NY 13045

Report Number: S9-15-2

Dear Mr. Boyden and Members of the Legislature:

A top priority of the Office of the State Comptroller is to help county officials manage their resources efficiently and effectively and, by so doing, provide accountability for tax dollars spent to support county operations. The Comptroller oversees the fiscal affairs of local governments statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations and governance. Audits also can identify strategies to reduce costs and to strengthen controls intended to safeguard assets.

In accordance with these goals we conducted an audit of six counties throughout New York State. The objective of our audit was to determine if the applicable county departments were adequately monitoring the State's Ignition Interlock Program to ensure proper use and compliance. We included Cortland County (County) in this audit. Within the scope of this audit, we examined the county departments' policies and procedures and reviewed the record of actions taken to comply with monitoring requirements of the Ignition Interlock Program for the period January 1, 2010 through January 28, 2015. This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This report of examination letter contains our findings and recommendations specific to the County. We discussed the findings and recommendation with County officials and considered their comments, which appear in Appendix A, in preparing this report. County officials generally agreed with our recommendation and indicated they planned to initiate corrective action. At the completion of our audit of the six counties, we prepared a global report that summarizes the significant issues we identified at all of the counties audited.

Summary of Findings

Department officials generally monitored the ignition interlock device (IID) installations and negative activities of offenders as required. However, for three of the 24 cases requiring installations (13 percent), the IIDs were installed after the required 10 business days, on average seven days late. In another case, where the individual indicated he owned a vehicle, there was no proof of an IID being installed. The monitors did not report these violations to the court or district attorney. In addition, the monitors did not report three cases with negative activity¹ in a timely manner, among the 24 completed installations, and did not report four cases which had negative activity due to a registered blood alcohol concentration (BAC) level, missed start-up retest, missed service visits and resulting IID lockouts.

Background and Methodology

Cortland County is governed by a 17-member County Legislature (Legislature) and has a population of approximately 49,000. The County's fiscal year 2015 budgeted appropriations totaled \$97.9 million. The County's Probation Department (Department) monitors the installation and activity of court-ordered ignition interlock devices (IIDs) using four senior probation officers, eight probation officers, and a probation assistant as monitors. As of December 31, 2014, the County was monitoring 122 open cases² that required an IID installation.

“Leandra’s Law,” a New York State law enacted November 18, 2009,³ is intended to protect the safety of the public. It requires, among other things, that – as a condition of being sentenced for certain alcohol-related offenses occurring on or after August 15, 2010 – a convicted individual install and maintain a breath alcohol IID on any vehicle owned or operated by that individual for a certain period of time.⁴ An ignition interlock device installed in a vehicle requires the operator to provide a breath sample in order to start the car.

The New York State Division of Criminal Justice Services (DCJS) has regulations for, among others, counties in regard to establishing standards for the usage and monitoring of IIDs ordered by criminal courts for these alcohol-related sentences.⁵ The County's Probation Department is responsible for monitoring court-ordered IIDs for both individuals sentenced to probation and

¹ For audit purposes, a negative event (activity) is the result of an individual's actions that are not in compliance with listed events in 9 NYCRR Section 358.7 (d) (1).

² Composed of 67 probation cases and 55 conditional discharge cases

³ The Child Passenger Protection Act (Chapter 496 of the Laws of 2009) is commonly referred to as Leandra's Law, which amended provisions of the Vehicle and Traffic Law (VTL), Executive Law and Penal Law. Provisions addressing the ignition interlock device became effective August 15, 2010, and Chapter 169 of the Laws of 2013, which strengthens certain provisions of Leandra's Law, took effect on November 1, 2013 (see Appendix B for additional detail). After this audit began, the Penal law was further amended to provide that when a court sentence includes a condition that an IID be installed and maintained by a defendant, and the court later declares that individual to be delinquent, the condition to have the IID installed continues to be in effect during the period of delinquency. The court may also extend the period of the IID installation by the period of the delinquency (see Chapter 440 of the Laws of 2015, effective November 20, 2015).

⁴ See VTL Section 1193, 1198; see also Executive Law Section 259-c.

⁵ See VTL Section 1193(1) (g) and 9 NYCRR Part 358 – Handling of Ignition Interlock Cases Involving Certain Criminal Offenders.

those sentenced to conditional discharge.⁶ Probation cases with an IID order requirement are generally assigned to one of four senior probation officers or one of eight probation officers. All conditional discharge cases are monitored by a probation assistant. Monitoring is a key component for ensuring that a vehicle operator is complying with a court order and for protecting the safety of the public.

Installation and activity requirements that must be monitored include the following:⁷

- The monitor shall receive court notification of an order for the IID within five business days from sentencing.
- The operator is required to have an IID installed within 10 business days of the court order or if sentenced to imprisonment, upon release from imprisonment, whichever is applicable.
- The operator shall submit to service visits at defined intervals (see Appendix B for details).
- The monitor shall notify the appropriate court and district attorney, within three business days, of the following:
 - Operator failure to install an ordered IID;
 - Operator non-compliance with a service visit requirement;
 - Any report of alleged tampering with or circumventing of the IID or an attempt thereof;
 - Any report of a lock-out mode, and/or any report of a failed test or retest when the BAC is .05 percent or higher.

Appendix B includes more details of monitoring requirements. The failure by an individual to comply with the Ignition Interlock Program may result in the conditional discharge or probation sentence being modified or revoked by the court.

To complete our audit objective, we conducted interviews with Department personnel and reviewed policies/procedures. We also reviewed court orders and information that the Department maintained for the IID records we sampled. We examined communications to ensure that appropriate monitoring actions were taken and tested records to confirm compliance. We conducted our audit in accordance with generally accepted government auditing standards (GAGAS). More information on such standards and the methodology used in performing this audit is included in Appendix C of this report. Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

⁶ As a general premise, probation is a sentencing option used by the court that permits the offender to remain in the community under conditions specified by the court, and involves some form of supervision or reporting requirement. A conditional discharge is a sentencing option which is generally used for minor violations that do not require probation supervision. The regulations provide, in part, that the county's ignition interlock program plan "shall specify monitoring by the probation department where the operator is subject to a period of probation supervision and may designate one or more alternative persons or entities, in lieu of the probation department, responsible for monitoring where an ignition interlock device has been imposed pursuant to a conditional discharge" (see, 9 NYCRR Section 358.4[c]).

⁷ See 9 NYCRR Section 358.7.

Audit Results

The County's Probation Department is responsible for monitoring court-ordered IIDs for both individuals sentenced to probation and those sentenced to conditional discharge.

Department officials generally monitored the ignition interlock device (IID) installations and negative activities of offenders as required. However, three of 24 installations (13 percent) were installed late. The IIDs were installed after the required 10 business days, on average seven days late. In another case, where the individual indicated he owned a vehicle, there was no proof of an IID being installed. We also confirmed that in the 35 cases where the individual indicated no ownership or operation of a vehicle, there were no registered vehicles. The monitors did not report these violations to the court or district attorney. In addition, the monitors did not report three cases with negative activity in a timely manner, among the 24 completed installations, and did not report four cases which had negative activity due to a registered blood alcohol concentration (BAC) level, missed start-up retest, missed service visits and resulting IID lockouts.

IID Installations – We selected 60 court orders⁸ requiring IID installation for offenders sentenced to probation or conditional discharge to determine if the Department adequately monitored the installations and notified the court of violations as required. In 35 cases the individuals indicated that they did not own or operate a vehicle and no IID was installed. We confirmed that none of the 35 cases had a registered vehicle during the IID order period. Of the 25 cases where the individuals indicated they owned or operated a vehicle, an IID was installed in 24 cases and in the remaining case there was no proof of a device being installed. Three of the 24 installations (13 percent) occurred after the required 10 business days, on average about seven days late. Further, the monitors did not report the four violations to the court or district attorney. Department monitors attributed the lack of reporting to professional discretion given to monitors.

Negative IID Activity – We reviewed the reported negative IID activity from the vendor for all 24 cases with installed devices (30 negative events)⁹ and found that the monitor did not notify the court and district attorney¹⁰ in a timely manner in three cases (nine negative events), which were reported on average eight days after the required three-day period. These events included failed tests due to BAC levels and IID lockouts. Additionally, the monitor did not report four cases with failed tests (21 negative events) due to a registered BAC level, missed start-up retest, missed service visits and resulting IID lockouts. The monitor attributed the delay in notifying the courts and district attorney to other work priorities. In the instances of the failed tests that were not reported, the monitor cited work priorities and the use of graduated sanctions (such as verbal warnings and face-to-face visits with the Probation Officer).

⁸ See Appendix C for methodology.

⁹ A “negative event” is counted each time an individual’s actions are not in compliance with listed events in 9 NYCRR Section 358.7 (d) (1). For example, each of the following is counted as a separate “event” for a total of three negative events even though the three events occur in one attempt to start a vehicle: a breath sample is given at a BAC of 0.05 percent, a sample is not given for a re-test, and a lock-out results.

¹⁰The monitor’s notifications sent to the court recommended that the “court notification defer the recommendation to the district attorney’s office.” According to the County’s IID Plan updated in 2014, for a conditional discharge case “a failure report is sent by the monitor to the district attorney, to be handled at the discretion of the district attorney.”

While the IIDs potentially stop intoxicated individuals from starting and driving their vehicle with a BAC higher than 0.025 percent,¹¹ courts rely on county monitoring to ensure an individual is following sentencing conditions and to protect the public. A failure to adequately monitor the IID program and report violations could prevent a court from knowing about noncompliance and from deciding whether an individual's sentence needs to be modified or revoked to keep the county roadways safe.

Recommendation

1. Department officials should address the causes of monitors' late or missed reporting of IID Program violations to the court and district attorney and institute procedures, as necessary, to help ensure that all violations are reported in a timely manner.

The County Legislature has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report should be prepared and forwarded to our office within 90 days, pursuant to Section 35 of the General Municipal Law. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. We encourage the Legislature to make this plan available for public review in the Clerk of the Legislature's office.

We thank the officials and staff of the Cortland County Probation Department for the courtesies and cooperation extended to our auditors during this audit.

Our office is available to assist you upon request. If you have any further questions, please contact Ann Singer, Chief Examiner of the Statewide and Regional Projects Unit, at (607) 721-8306.

Sincerely,

Gabriel F. Deyo
Deputy Comptroller

¹¹ See 9 NYCRR Section 358.5 (c) (2).

APPENDIX A

RESPONSE FROM COUNTY OFFICIALS

The County officials' response to this audit can be found on the following pages.



CORTLAND COUNTY

60 Central Avenue
Cortland NY 13045

Donnell E. Boyden
Chair, Cortland County Legislature

Jeremy Boylan
Clerk of the Legislature

September 14, 2015

Ann C. Singer, Chief Examiner
State Office Building, Suite 1702
44 Hawley Street
Binghamton, New York 13901-4417

Dear Ms. Singer and Associates:

On behalf of Cortland County Legislative Chairman, Donnell Boyden, I am responding to the draft audit report compiled by the New York State Comptroller's Office regarding monitoring of the NY State Ignition Interlock Program.

Following a review of the draft with Mr. Boyden, this Writer, and two representatives from the Comptroller's Office, we have no issues with the methodology or accuracy of the report. It is our opinion that, overall, the Cortland County Probation Department is in compliance with only a very few exceptions. While we do not refute the findings we are offering the following explanations for those areas in which we appeared to be remiss.

- IID Installations occurring after the allotted 10 business days without notification to the Court or District Attorney's Office: We believe that these delays were related to individuals who were not residents of Cortland County and were in the process of being transferred to other jurisdictions. We do our best to meet with the individual prior to transfer but many times we are not aware of sentencing until after the individual has returned to his/her county of residence and instructions and verification have to be relayed via telephone and/or fax machine. This process is not always expedient and there have been occasions when finding an installation site has been difficult. At no times were any of these cases unattended to and we continued working diligently with the individuals to procure installation. As there were on-going good faith efforts on the part of the offender, Court notification did not occur. We would also like to note that installation difficulties have been encountered with DWI offenders sentenced within NY State but who are residents of a different state, especially in cases where the Court has either waived the fee or ordered partial pay. It was our experience that one out-of-state resident had to return to NY State for IID installation as the partial pay was not recognized by the installer in the state of residence, citing the manufacturer's agreement was with NY State exclusively.
- Negative IID Activity: After reviewing the findings related to failure to notify the Courts and District Attorney of negative events, we determined that we initially misinterpreted actions that were required to be taken. For instance, there is a referral to Part 352 of the NYCRR Title 9, which addresses Probation response to an offender's non-compliance with Probation conditions. This section allows for graduated sanctions at the discretion of the supervising Probation department. We erroneously assumed that this discretion continued to apply without the need to formally inform the Court or the District Attorney. In some instances wherein notification had been made but there was no recommendation for a Violation of Probation or Conditional Discharge, the Court and/or the District Attorney questioned the need for notification and requested not to be notified unless a violation was being recommended or the BAC was .05 or more for any failure or lock-out. Probation Officers mistakenly interpreted this to mean that any failures that were being administratively addressed by



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Probation did not have to be reported. In instances that reporting did not occur within 3 days, "other work priorities" was cited by a Probation Supervisor. As explanation he reported that he had various other issues imminently impacting community safety and equally or more time sensitive. This Writer concurred with the Supervisor's decision. The collective reasoning being that, notification of an IID failure is not received until after the DWI offender brings his/her IID card for download resulting in as much as a 30 day gap between the incident and the notification. The monitoring agency then has only 3 days to report an event that not only occurred sometimes 30 days ago but also indicates that the IID did exactly as intended; it kept the individual from driving after consuming alcohol. Conversely, we have 7 days to report any non-compliance with other conditions and all other convictions. We also believe there should be consideration of the fact that the rule mandates reporting of any "lock-out" mode but does not adequately differentiate between a "lock-out", wherein the vehicle will not start and a "temporary lockout" wherein the individual was locked out initially but approximately 5 minutes later re-tested and registered a .000 BAC. We were warned by manufacturers that several products, (i.e. mouthwash, hand-sanitizer, certain foods, etc.) could cause a failure, hence the need for a re-test shortly after the initial test.

In closing, we would like to assure all involved that community safety is first and foremost in the Cortland County Probation Department mission. We acknowledge that in a few cases we did not adhere to timelines and notifications but at no time did this department or any individual there-in, neglect or ignore any issue related to a DWI Offender's non-compliance with Ignition Interlock conditions and requirements.

Please accept the attached addendum to this letter as the Cortland County Probation Department's formal Corrective action Plan.

Respectfully submitted,

Lisa A. Cutia
Probation Director

Donnell Boyden, Chair
Cortland County Legislature



CORTLAND COUNTY

60 Central Avenue
Cortland NY 13045

Donnell E. Boyden
Chair, Cortland County Legislature

Jeremy Boylan
Clerk of the Legislature

Unit Name: Cortland County Probation Department

Audit Report Title: Ignition Interlock Program

Audit Report Number: S9-15-2

I. Audit Recommendation:

- A. Department officials should address the causes of monitors' late or missed reporting of IID Program violations to the court and district attorney and institute procedures, as necessary, to help ensure that all violations are reported in a timely manner.

II. Implementation Plan of Actions:

- A. A staff meeting will be commenced to re-address implementation of Leandra's Law, specifically NYCRR Title 9, Part 358 and VTL §1193, 1198, with special attention to timely notifications to the Court and District Attorney within 3 business days of being notified of any of the following:
 - 1) Operator failure to install IID,
 - 2) Operator has not complied with required service visit,
 - 3) Any report of alleged tampering or circumvention of IID, or
 - 4) Any report of lockout mode, and/or any report of a failed test or retest where BAC is .05% or higher.
- B. The Probation Supervisor(s) will receive all new DWI Probation and Conditional Discharge orders for assignment to a Probation Officer/Probation Assistant and will follow-up within 5 business days to verify installation of IID. If no installation has occurred within timeframe, the Supervisor will follow-up within 3 business days to ensure notification has been made where appropriate.
- C. The Senior DWI Probation Officer will provide all IID Reports to the Probation Supervisor and determine if notification to the Court and District Attorney is required and/or warranted. The Probation Supervisor will follow-up within 3 business days to ensure that notification has been made.
- D. Department Policy and Procedure of handling of Ignition Interlock contains part A and will be amended to include parts B and C.

III. Implementation Date:

- A. The corrective action plan will be implemented as soon as possible and no later than October 30, 2015.

VI. Person Responsible for Implementation:

- A. The Cortland County Probation Director will be responsible for implementation of the above Corrective Action Plan

 Lisa A. Cutia
 Probation Director

9/24/15
Date

 Donnell Boyden
 Legislature Chair

9-22-15
Date

APPENDIX B

CERTAIN DEFINITIONS AND MONITORING REQUIREMENTS¹²

Definitions

“Ignition Interlock Device” – Any blood alcohol concentration equivalence measuring device which connects to a motor vehicle ignition system and prevents a motor vehicle from being started without first determining through a deep lung breath sample that the operator’s equivalent blood alcohol level does not exceed the calibrated setting on the device as required by standards of the department of health.

“Monitor” – The local probation department where the operator is under the probation supervision or any person(s) or entity(ies) designated in the county’s ignition interlock program plan for any operator granted conditional discharge.

Monitoring Requirements

Minimum standards for the usage and monitoring of ignition interlock devices imposed by a criminal court for a felony or misdemeanor under the Vehicle and Traffic Law or Penal Law are provided, in part, as follows.

- Any monitor shall receive notification pursuant to its county plan of all operators which it has responsibility to monitor within five business days of the sentencing court’s order imposing the condition of an ignition interlock device and of an operator’s release from imprisonment. Such monitor shall obtain proof of installation by the operator and installation/service provider.
- Every operator shall have installed and maintain a functioning ignition interlock device in any vehicle(s) he or she owns or operates within 10 business days of the condition being imposed by the court or if sentenced to imprisonment upon release from imprisonment, whichever is applicable; within three business days of installation, submit proof of installation to the court, county probation department, and any other designated monitor.
- Qualified manufacturers notify the monitor and county probation department when an ignition interlock device has been installed on an operator’s vehicle(s) within three business days of installation. Where a monitor learns that the operator no longer owns or operates a motor vehicle in which an IID has been installed, the monitor may issue letter of de-installation directly to the installation/service

¹² See Title 9 NYCRR Part 358, Handling of Ignition Interlock Cases Involving Certain Criminal Offenders, available on the DCJS website: <http://www.criminaljustice.ny.gov/opca/ignition.htm>.

provider which authorizes removal of the device. The monitor selects the class of IID and features to be used in the county.

- Upon learning of the following events: (i) that the operator has failed to have installed the ignition interlock device on his/her own vehicle(s) or vehicle(s) which he/she operates; (ii) that the operator has not complied with service visits requirements; (iii) a report of alleged tampering with or circumventing an ignition interlock device or an attempt thereof; (iv) a report of a failed start-up re-test; (v) a report of a missed start-up re-test; (vi) a report of a failed rolling re-test; (vii) a report of a missed rolling re-test; and/or (viii) a report of a lockout mode; the applicable monitor shall take appropriate action consistent with public safety. Where under probation supervision, the county probation department shall adhere to Part 352. With respect to any operator sentenced to conditional discharge, the monitor shall take action in accordance with the provisions of its county ignition interlock program plan. At a minimum, any monitor shall notify the appropriate court and district attorney, within three (3) business days, where an operator has failed to have installed the ignition interlock device on his/her own vehicle(s) or vehicle(s) which he/she operates, where the operator has not complied with a service visit requirement, any report of alleged tampering with or circumventing an ignition interlock device or an attempt thereof, any report of a lock-out mode, and/or any report of a failed test or re-test where the BAC is 0.05 percent or higher. The monitor may recommend a modification to the operator's condition of his or her sentence or release whichever is applicable as otherwise authorized by law, including an extension to the IID period, a requirement that the operator attend alcohol and substance abuse treatment and/or drinking driver program, referral to the Department of Motor Vehicles to determine whether the department may suspend or revoke the operator's license, or recommend revocation of sentence or release. Where the operator is under supervision by the Division of Parole, the monitor shall coordinate monitoring with the Division and promptly provide the parole agency with reports of any failed tasks or failed tests.
- Any monitor may disseminate relevant case records, including failed tasks or failed reports not otherwise sealed or specifically restricted in terms of access by state or federal law to, among others, appropriate law enforcement authorities. In all such instances, those to whom access has been granted shall not secondarily disclose such information without the express written permission of the monitor that authorized access.
- Every operator shall submit to service visits within thirty (30) calendar days of prior installation or service visits for the collection of data from the ignition interlock device and/or for inspection, maintenance, and recalibration purposes where the device does not automatically transmit data directly to the monitor; and submit to

an initial service visit within thirty (30) calendar days of installation and service visits within sixty (60) calendar days of prior service visits where the device either automatically transmits data directly to the monitor for inspection, maintenance, or recalibration purposes or the device head is sent to the qualified manufacturer every thirty (30) calendar days for such purposes, including data download. However, an operator shall only remove the device head upon receipt of a new device head.

Chapter 169 of the Laws of 2013:

On July 26, 2013, Chapter 169 of the Laws of 2013 was signed into law to strengthen certain provisions of “Leandra’s Law” and establish new safeguards to help keep impaired drivers off the streets. This Chapter took effect November 1, 2013 and applies to those violations committed on and after such date. Among its provisions are as follows:¹³

- Extending the period of interlock restriction to a minimum of 12 months (from six months) for individuals convicted of DWI and/or other alcohol-related offenses.¹⁴
- Authorizes imposition of IIDs to be installed prior to sentencing as a preventive measure. The period of IID restriction will commence from the earlier of the sentencing date, or installation date in advance of sentencing.
- Establishing that a court can waive the installation of an IID only where the defendant asserts under oath that he/she is not the owner of any motor vehicle and that he/she will not operate any motor vehicle during the period of interlock restrictions, except as may be otherwise authorized pursuant to law.
- Ensuring that youth adjudicated as Youthful Offenders of DWI and/or other alcohol related offenses will be subject to Leandra’s Law provisions, including the IID requirement.
- Expanding upon the Class E felony, Aggravated Unlicensed Operation 1st Degree to capture operators who were given the benefit of a conditional license after a DWI and/or alcohol-related offense and then drive impaired again.
- Clarifies that operators provide proof of installation compliance with the IID requirement to the court and the probation department or other monitor where such person is under probation or conditional discharge supervision.

¹³ See Leandra’s Law – Reform and Ignition Interlock Program Plan Updates, State of New York Division of Criminal Justice Services, Office of Probation and Correctional Alternatives, dated April 14, 2014.

¹⁴ VTL Section 1193 (1) also provides that “such period of interlock restriction shall terminate upon submission of proof that such person installed and maintained an ignition interlock device for at least six months, unless the court ordered such person to install and maintain an ignition interlock device for a longer period as authorized...and specified in such order.”

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

We interviewed the County staff involved in the IID program for general background information and policies/procedures in place with respect to usage of ignition interlock devices and monitoring the compliance of an individual subject to installation of an ignition interlock device.

To determine if the Department is monitoring the IID program for both conditional discharge and probation cases, we obtained the list of individuals with a court-ordered sentence to install an IID. To verify reliability, we compared this list, which was pulled from the County Probation Department's quarterly reports,¹⁵ to the New York State Office of Court Administration (Unified Court System) records showing required IIDs.

We sampled 60 of 192 cases reported by the County from 2013 and 2014 for conditional discharge and probation cases to focus on current impact to the public. We sorted the list for the sample by separating conditional discharge from probation and unidentified cases, selecting every other case for conditional discharge cases, every third case for probation and every fourth case if a case was not identified as a conditional discharge or probation case. We reviewed documentation in each individual file (hardcopy and electronic formats when available) to determine timing of installation of an IID and communications between the monitor and the courts/district attorneys. Further, we met with County staff to understand the actions taken for negative IID activity related to a case.

For the same cases sampled that were identified by court documentation as not having a vehicle and where no IID was installed, we used software tools to determine if the individual had any vehicle registered.¹⁶

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹⁵ County reports: "Monitors' Report of Ignition Interlock Sentences Received" and "County Monitors' Report of Ignition Interlock Device Sentencing Orders Received and Installation Status"

¹⁶ The software accesses only public records reported in electronic format.