



# COUNTYWIDE CRIMINAL JUSTICE COORDINATION COMMITTEE



March 1, 2012

TO: Supervisor Zev Yaroslavsky, Chair  
Supervisor Gloria Molina  
Supervisor Mark Ridley-Thomas  
Supervisor Don Knabe  
Supervisor Michael Antonovich

FROM: Mark Delgado, Executive Director  
Countywide Criminal Justice Coordination Committee

SUBJECT: Public Safety Realignment Implementation Update No. 4 – December 2011 to  
January 2012 (Related to Item S-1 of the August 30, 2011 Board Agenda)

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On August 30, 2011, your Board directed the Countywide Criminal Justice Coordination Committee (CCJCC) to work with impacted departments and provide status reports on public safety realignment implementation in the County. This report and data attachments I and II provide information captured by departments through January 31, 2012.

## **POSTRELEASE COMMUNITY SUPERVISION (PCS)**

### **Pre-release Packets and Screening**

Probation received 1,152 pre-release packets in December and 1,165 in January. The department received 7,168 total packets through the end of January.

From January 9<sup>th</sup> to February 3<sup>rd</sup>, the California Department of Corrections and Rehabilitation (CDCR) assigned a four-person team to the County to assist with the prescreening process. The team assisted with processing activities, including: verifying PCS eligibility, identifying release date changes, contacting prisons to verify inmates' custody status, and troubleshooting problematic cases. The team also conducted training sessions for County staff on matters related to pre-release packet content and material relevance.

The Department of Mental Health (DMH) continues to prescreen packets that indicate a mental health issue may be present. The department prescreened 1,013 packets through the end of January. DMH reports that fewer packets are missing the mental health information and that improvements in the process of identifying those who may need service has resulted in fewer "no treatment required" findings at prescreening.

Between October 1, 2011 and January 31, 2012, 4,482 Postrelease Supervised Persons (PSPs) were released to the County on Postrelease Community Supervision (PCS) according to the CDCR Law Enforcement Automated Data System (LEADS). Actual release numbers by month and initial projections are indicated in Table 1.

Table 1

	CDCR Projected	Actuals
October	1,245	1,034
November	1,108	1,203
December	1,088	1,172
January	975	1,073
February	833	-
March	868	-
April	806	-
May	769	-
June	732	-
Total	8,424	10,085*

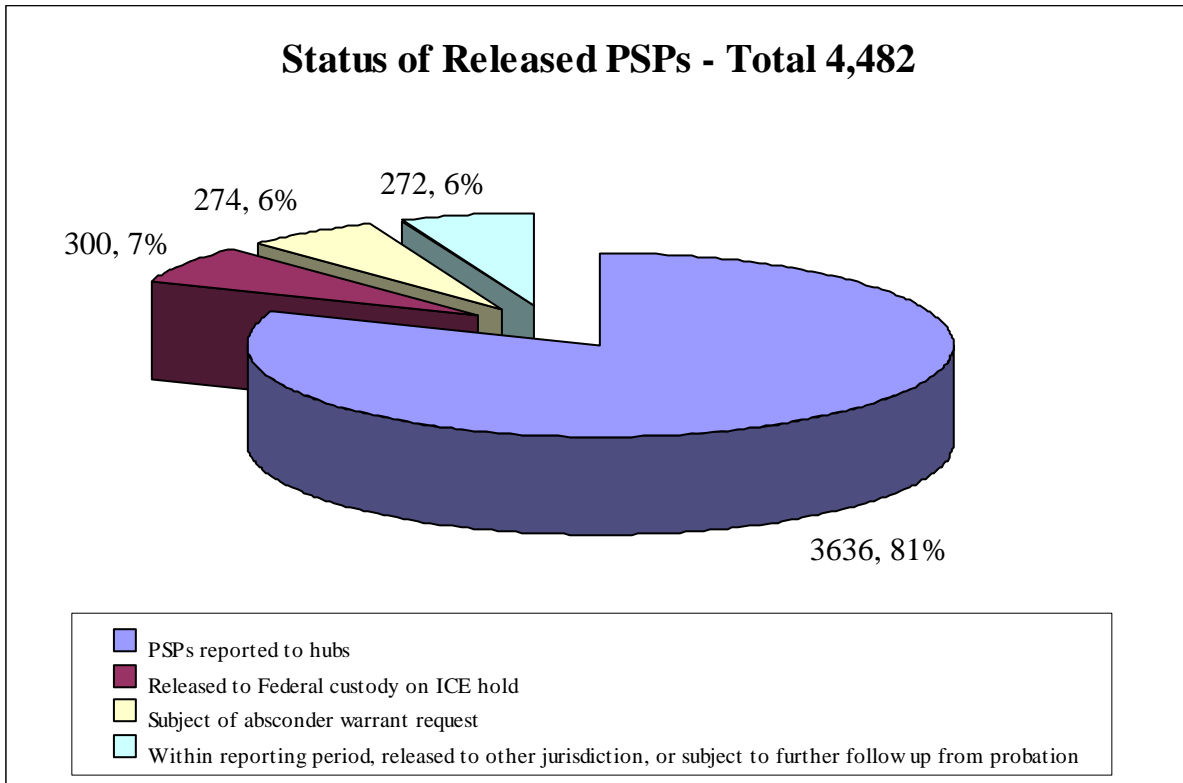
\* Projection is based on average of first four months.

The number of PSPs released in the first four months is consistent with initial projections. However, as shown in Table 1, initial projections anticipated a reduction in the number of PSPs released each month. Probation is tracking this data closely to monitor for this trend. If such a reduction does not materialize and current release rates remain steady, the County will receive more PSPs by the end of the fiscal year than originally anticipated.

**Hub Intake/Assessment**

In December and January, 952 and 965 PSPs reported to the hubs, respectively, for intake and assessment. The following chart indicates the reporting status of the 4,482 PSPs released to the County through the end of January.

Chart 1



Departments highlight the following developments related to hub intake processes:

- Probation has initiated drug testing at the hubs of individuals identified in the pre-release packets as having substance abuse histories or potential treatment needs. Such testing will immediately reinforce for PSPs that they will be closely supervised while on PCS for compliance with their supervision conditions. Testing will also provide deputy probation officers an early performance indicator to assist with case management and supervision.
- Co-located DMH staff at the hubs assessed 964 individuals for mental health needs (27% of the reporting population) by the end of January.
- The Department of Public and Social Services (DPSS) screened 2,888 PSPs for benefits eligibility and has enrolled 908 (31%) in benefits programs. The majority of those have been enrolled in CalFresh (663) or CalFresh and General Relief (194).
- Probation has submitted a Space Request/Evaluation (SRE) to the Chief Executive Office to explore possible lease sites in the Antelope Valley for an assessment hub. In the interim, Probation is reconfiguring its existing Antelope Valley Adult Area Office to serve as a temporary hub. It is estimated that the floor plan changes and electrical additions will take approximately 30 to 45 days to complete.

Both DMH and DPSS have been informed of the Antelope Valley hub developments. Space has been allocated for both departments to accommodate the co-location model.

- The Department of Children and Family Services (DCFS) and Department of Public Health – Substance Abuse Prevention and Control (DPH-SAPC) have expressed an interest in co-locating at PCS hubs. The departments continue to work with Probation on a potential co-location plan.

### **PCS Population Characteristics and Supervision Challenges**

Probation continues to report that PSPs are assessed at higher levels of risk to recidivate than the department anticipated. The department estimated that 49% would be high risk, 26% medium risk, and 25% low risk. Through January, 64% of PSPs had assessed as high risk, 32% as medium risk, and 4% as low risk.

Similarly, DMH reports that the acuity of clients continues to be higher than anticipated and that this remains a significant concern. This issue is particularly apparent for those who were previously designated mentally disordered offenders (MDO) but who are legally eligible for PCS because their MDO status has been terminated.

Probation also reports that there are a large number of PSPs released from CDCR with high needs for immediate mental health services upon transfer. There were 19 special handlings in December and 14 in January. Transitioning these individuals to the County from CDCR consumes significant departmental resources.

Additionally, while persons may be required to take medication when in a prison environment, no such requirement can be made once they are under community supervision. Some severely mentally ill clients are only re-stabilized on medication upon an incarceration event.

**Provision of Treatment Services to Individuals**

Engaging PSPs in treatment remains a significant challenge. For example, while there are signs of improvement, the percentage of PSPs reporting to the Community Assessment Service Centers (CASCs) for substance abuse assessments remains low. Table 2 shows cumulative totals for referrals and the percentage of PSPs who reported by the last day of each month.<sup>1</sup>

*Table 2*

	<b>Through Oct</b>	<b>Through Nov</b>	<b>Through Dec</b>	<b>Through Jan</b>
Referrals to CASCs for Substance Abuse Treatment	333	716	1,066	1,431
Number reporting to CASCs	9 3%	65 9%	263 25%	491 34%

Similarly, while the most recent month’s data shows improvement, the percentage of PSPs assessed at the hubs by DMH who refuse treatment services remains high. Table 3 shows the percentage of assessed PSPs in each month who have refused mental health treatment at the hubs.<sup>2</sup>

*Table 3*

	<b>Oct Releases</b>	<b>Nov Releases</b>	<b>Dec Releases</b>	<b>Jan Releases</b>
DMH assessments at hubs – treatment needed	298	281	219	166
Number refusing mental health treatment at hubs	74 25%	77 27%	76 35%	32 19%

DMH suggests that in addition to potentially leading to higher recidivism, PSPs not engaging in treatment results in them utilizing more costly services, such as psychiatric emergency rooms, inpatient facilities, and urgent care centers.

Departments continue to implement strategies and process improvements to address these issues and connect PSPs to treatment as effectively as possible, such as:

- ***Mandatory treatment conditions*** – While PSPs released from prison are subject to standard conditions, Probation is emphasizing treatment as a condition of supervision and

<sup>1</sup> Data in Table 2 is cumulative through the end of each month and is not organized by month of release.

<sup>2</sup> Data in Table 3 is not cumulative but is based on the month of release.

adding specific substance abuse and mental health treatment conditions on PSPs. To that end, Probation has added 1,367 mental health treatment conditions and 2,375 substance abuse treatment conditions.

- *Narcotics testing at the hubs* – Probation has instituted a policy at the hubs of drug testing individuals identified in the pre-release packets as having substance abuse histories or potential treatment needs. As mentioned earlier, such testing will immediately reinforce for PSPs that they will be closely supervised by probation for compliance with their supervision terms. Testing will also provide deputy probation officers an early performance indicator to assist with case management and supervision.
- *Service Provider Contracts* – The County’s sole source contract with Haight Ashbury was awarded in December. This contract, which runs through the remainder of the fiscal year, addresses support service needs – such as housing, transportation, and employment/vocational services – for the PCS population.

In addition, the Probation Department – in collaboration with the Sheriff’s Department – released a Request for Proposals (RFP) in January to identify organizations that can provide support services, such as transitional housing, sober living homes, shelter, transportation, and job readiness/placement.

- *Mobile Assistance Team* – To meet the demand for transportation services for PSPs with special needs, the Probation Department developed and implemented the Mobile Assistance Team (MAT). MAT is designed to provide transportation services to PSPs unable to use public transportation due to acute mental health issues. The transportation process is a collaborative effort among Probation, CDCR, DMH, Department of Health Services County hospitals, and shelter agencies.
- *Mental Health Training Program* – Probation and DMH have initiated a mental health training program for Probation’s AB 109 staff. The training will focus on identifying potential mental health needs, de-escalating potential high risk situations, and improving referrals to service.
- *TCPX Enhancement* – DPH-SAPC – in coordination with Probation, DMH, and Internal Services Department – has modified the Treatment Court Probation Exchange (TCPX) data tracking system. This system will now allow departments to track treatment referrals, assessments and placements, progress reports, and terminations in a real time fashion. TCPX will be a critical tool for facilitating referrals to treatment and ensuring compliance. TCPX modifications have been finalized and staff in participating departments are now being trained in its use.

### **Supervision and Enforcement**

Probation, the Sheriff’s Department, and the District Attorney’s Office continue to track data on warrants, arrests, and other PCS enforcement efforts. Table 4 summarizes various enforcement actions taken from realignment’s October 1<sup>st</sup> start date through the end of January.

*Table 4*

	Oct	Nov	Dec	Jan	Total
Sheriff and LAPD attempts to contact PSP “no shows”	46	139	185	157	527
Warrants requested for absconders by Probation	0	95	87	67	249
Arrests of PSPs on new charges (non-warrant)	80	165	261	389	895
New cases presented to the D.A. for filing					406

While the majority of cases presented to the District Attorney were theft- or drug-related, some cases do include serious and/or violent charges.

In addition to the enforcement activity summarized in Table 4, departments highlight the following developments:

- Probation and the Los Angeles Police Department (LAPD) have initiated a pilot project in which five deputy probation officers are co-located within the five LAPD bureaus to enhance cross-agency collaboration.
- The Probation Department, Sheriff’s Department, and Superior Court finalized the process for ensuring that all absconder warrants are included in both the state’s and federal wanted persons systems. The County’s extradition process in these cases needs to be finalized. In the interim, Probation will extradite individuals arrested out of the County’s jurisdiction on a PSP absconder warrant.

Finally, there is a urgent and emerging issue related to office space needs for Probation’s PCS supervision staffing. Until now, Probation has been able to accommodate additional staffing in existing area office space. However, as additional deputy probation officers are allocated and assigned to PCS caseloads, additional office space will be needed.

**Revocation Process**

Probation initiated revocation proceedings in three cases in December and one case in January. None of these cases reached the stage of a Court Revocation Hearing, as all the cases settled at the initial Probable Cause Hearing (PCH). The PCH includes the participation of the defendant and staff from Probation, District Attorney’s Office, and offices of the Public Defender and Alternate Public Defender.

The Public Safety Realignment Team’s Legal Work Group continues to refine the revocation process in anticipation of an increasing number of petitions for revocation in the months to come. In particular, the PCH is being replaced by a probable cause determination process administered by designated officers within the Probation Department.

This change, consistent with realignment legislation, offers several benefits:

- Instituting a formal probable cause determination process with designated officers will provide a second level of approval on all revocation petitions and increase quality control of petitions submitted to the Court.
- The more efficient process for filing a revocation petition will decrease the possibility that an individual posing a danger to the community will be prematurely released from custody pending revocation.
- Eliminating the PCH will incorporate the Court's participation earlier in the process and help resolve some of the operational issues identified in previous reports, such as the inability to secure witnesses and interpreters for the PCH.

While the number of revocations initiated remains low, it is expected that the number of revocations will begin to increase with more PSPs in the community and as Probation deems intermediate sanctions inadequate for responding to PSPs with continued violations. In addition, as Probation adds more mandatory treatment conditions on PSPs, non-compliance and non-participation in treatment can increasingly become grounds for revocation.

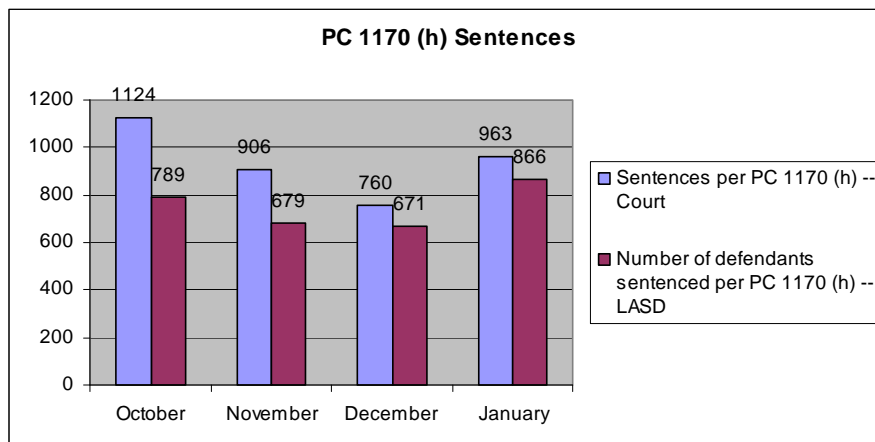
One outstanding revocation issue that remains is the process for handling hearings when a PSP is mentally incompetent to participate in his or her defense. This was not addressed in the legislation, and statutes that apply to criminal cases would not apply to these proceedings. The Court and others have raised this issue with the State as a need for cleanup legislation. In the interim, DMH's Court Liaison Program will attempt to link PSPs to appropriate services when a PSP presents mental health issues at a hearing.

## CUSTODY

### Sentences per Penal Code 1170 (h)

Realignment legislation enacted Penal Code 1170 (h), which specifies that certain non-violent, non-serious, non-sexual felony offenders (N3) are no longer eligible for state prison sentences. Efforts to capture how many PC 1170 (h) sentences are made continue to be refined. For example, there is a significant difference between the number of PC 1170 (h) sentences made and the number of individuals the jail receives on such sentences. (One defendant may have multiple cases that result in a PC 1170 (h) sentence.) This differentiation is illustrated in Chart 2.

Chart 2



Departments highlight the following facts related to PC 1170 (h) sentences:

- The Sheriff’s Department reports that as of the end of January, 208 N3s had been released from jail after having served their full sentence term. In addition, 120 N3 inmates had been assigned as station trustees, housed in local Sheriff stations, and equipped with electronic monitoring devices.
- Since the beginning of December, the Sheriff’s Department has not released any sentenced N3 inmates until their full sentence is served. All N3 inmates are currently serving 100 percent of their sentence in custody.
- The Superior Court reports that 192 “split sentences” were given per PC 1170 (h) through the end of January. Such sentences divide the sentence time between jail and mandatory community supervision. Upon release from jail, community supervision on split sentences is conducted by the Probation Department.

**Parole and Postrelease Community Supervision Violations**

- To date, the use of flash incarceration by the Probation Department has been mostly limited to PSPs arrested on a bench warrant, and the impact on the jail population has been minimal. Twelve PSPs have been flash incarcerated by supervising officers for other non-compliant or violation activity. Only four PSPs have faced revocation proceedings and been sentenced to jail for violations.
- The number of sentenced parole violators, which now also serve custody time in County jail, has steadily increased from 514 on October 31<sup>st</sup> to 783 on January 31<sup>st</sup>.

**Summary of Custody Impact**

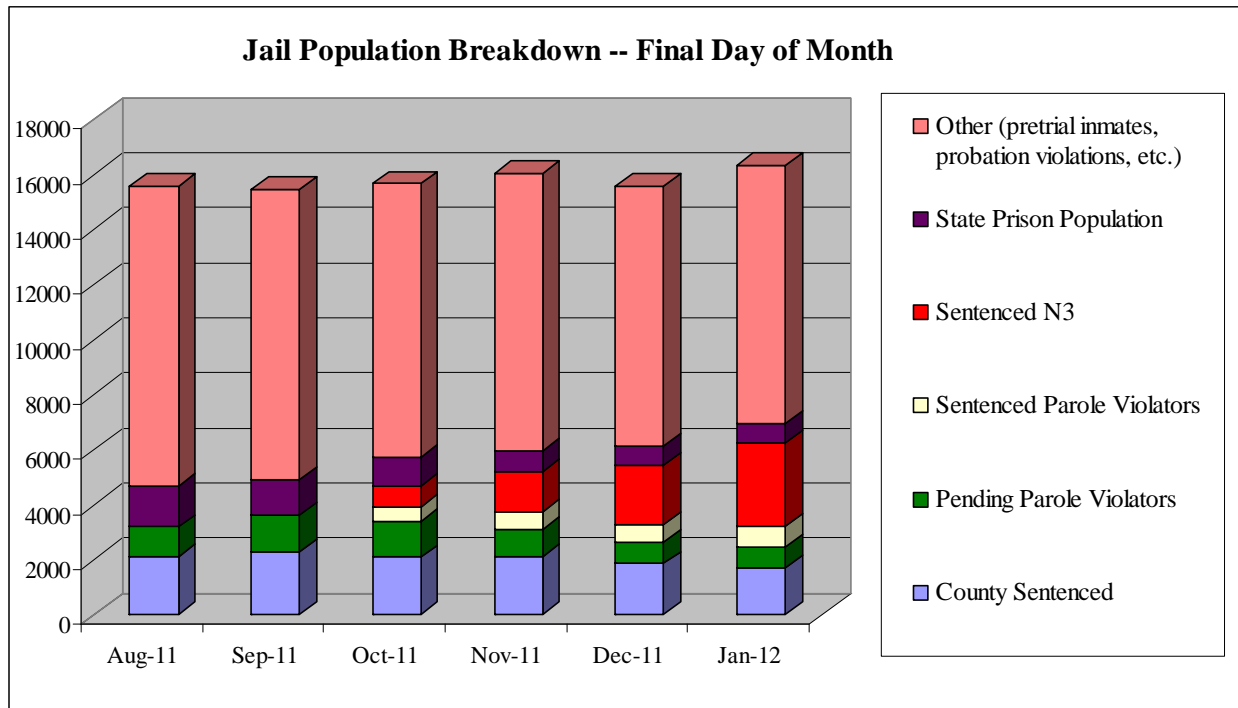
On August 31, 2011 – a month prior to realignment’s implementation – the jail population count was 15,598. By the end of January, 3,005 N3s had been sentenced to County jail, and the total population had increased by 759 to 16,357.

*Table 5*

	8/31/11	9/30/11	10/31/11	11/30/11	12/31/11	1/31/12	+/-	Change
Other (open charges, probation violations, etc.)	10,908	10,560	9,950	10,113	9,412	9,400	-1,508	-14%
Sentenced N3	0	0	789	1,468	2,139	3,005	3,005	-
Sentenced PV	0	0	514	598	644	783	783	-
Pending PV	1,101	1,321	1,312	1,014	790	747	-354	-32%
County Sentenced	2,100	2,300	2,089	2,120	1,860	1,712	-388	-18%
State Prison Population	1,489	1,282	1,017	747	730	710	-779	-52%
Physical Count (ADP)	15,598	15,463	15,671	16,060	15,575	16,357	759	5%



Chart 3



The sentenced N3 population, parole violator population, and total jail population have continued to grow each month – a trend certainly expected post-realignment. As illustrated in Table 5 and Chart 3, reductions in other populations have so far partially offset those increases.

While the above data provides an early snapshot of population growth and change in composition, it is difficult to draw a full set of conclusions from the above information because of seasonal fluctuations in the jail population and the fact that realignment is still in the early stages of implementation. The Sheriff’s Department continues to monitor this growth closely, prepare for continued population expansion, and explore alternative options – such as fire camps and community correctional facilities – to help address growing capacity needs.

Attachments

- c: Chief Executive Officer
- Executive Officer of the Board of Supervisors
- County Counsel
- Public Safety Realignment Team
- CCJCC Members
- Civil Grand Jury

## Public Safety Realignment Summary of Implementation Data

	OCT 2011	NOV 2011	DEC 2011	JAN 2012	TOTAL
<b>Postrelease Community Supervision</b>					
<b>Pre-Release Packets</b>					
No. pre-release packets received	3,635	1,216	1,152	1,165	7,168
<i>No. pre-release packets processed</i>	1,369	1,125	1,643	1,803	5,940
<i>No. pre-release packets deemed ineligible (of those processed)</i>	114	41	77	89	321
No. PSPs with Special Handling Requirements	10	21	19	14	64
No. of PSPs who are registered sex offenders	20	21	13	22	76
No. address verifications conducted	207	64	10	8	289
No. homeless/transient PSPs (CDCR LEADS 2/12/12)	158	146	144	103	551

### PSP Reporting Population

No. PSPs released to County per pre-release packet dates	1,036	1,269	1,152	1,133	4,590
No. PSPs directly released to County per CDCR LEADS (2/2/12)	1,034	1,203	1,172	1,073	4,482
No. PSPs released to Federal custody with ICE detainer	81	86	70	63	300
No. PSPs released to other jurisdiction custody	15	42	29	43	129
No. PSPs transferred to L.A. County from other counties	5	6	12	25	48
No. PSPs transferred from L.A. County to other jurisdictions	9	7	18	36	70
No. PSPs processed at hubs (intake/assessment)	756	963	952	965	3,636
<i>Male</i>	655	847	827	829	3,158
<i>Female</i>	101	116	125	136	478
No. PSPs by risk tier, as assessed at hubs:					
<i>Low Risk</i>	30	43	38	15	126
<i>Male</i>				11	
<i>Female</i>				4	
<i>Medium Risk</i>	242	364	305	374	1,285
<i>Male</i>				317	
<i>Female</i>				57	
<i>High Risk</i>	484	556	609	576	2,225
<i>Male</i>				501	
<i>Female</i>				75	
No. PSPs who are veterans		11	14	25	50

### PSP "No-Show" and Absconder Population

No. "no-show" notifications to Sheriff	46	139	185	157	527
No. Sheriff and LAPD attempts to contact "no-show" PSPs	46	139	185	157	527
No. warrants requested for absconders	0	95	87	67	249
No. warrants issued	0	34	124	83	241
No. absconders apprehended (warrant pick-ups)	0	22	36	59	117
No. of active warrants remaining*	0	12	100	124	124

\* The number of active warrants remaining is cumulative and includes remaining warrants from previous months.

### PSP Violations/Revocations/New Charges

No. of Probable Cause Hearings	0	0	1	3	4
No. of petitions for revocations (other than warrants)	0	1	1	6	8
No. of Revocation Hearings	0	0	0	0	0
No. PSP arrests for new offenses	80	165	261	389	895
No. of cases presented to the D.A. for filing					406

### Mental Health Treatment Services

No. of pre-release packets forwarded to DMH for review	238	236	253	344	1,071
No. of mental health treatment conditions added by Probation	892	241	157	77	1,367
No. of PSPs assessed by DMH at HUBs (based on month of release)	298	281	219	166	964
No. of PSPs refusing Mental Health Services at HUBs (based on month of release)	74	77	76	32	259
SEE ATTACHMENT 2 FOR ADDITIONAL MENTAL HEALTH INFORMATION					

OCT 2011      NOV 2011      DEC 2011      JAN 2012      TOTAL

**Substance Abuse Treatment Services (Based on month of assessment)**

No. of referrals made to CASCs for Substance Abuse Treatment only assessment	333	383	350	365	1,431
No. of substance abuse treatment conditions added by Probation	1,471	404	295	205	2,375
No. of narcotics testing orders added by Probation	1,922	525	304	189	2,940
No. of PSPs showing at CASCs for assessment	9	56	198	228	491
No. of CASC referrals to:	8	33	87	84	212
<i>Residential Treatment Services</i>	1	5	19	19	44
<i>Outpatient Treatment Services</i>	7	28	68	65	168
<i>Sober Living</i>	0	0	0	1	1
No. of PSPs entering:	6	22	30	20	78
<i>Residential Treatment Services</i>	1	4	5	11	21
<i>Outpatient Treatment Services</i>	5	18	25	9	57
<i>Sober Living</i>	0	0	0	1	1

**Referrals for other Services (Based on month of assessment)**

No. PSPs screened for benefits eligibility by DPSS	646	780	707	755	2,888
No. PSPs who DPSS referred to local DPSS office	489	569	528	562	2,148
No. PSPs enrolled in:	186	229	248	245	908
<i>MediCal</i>	2	1	0	0	3
<i>Med/CF</i>	0	1	1	2	4
<i>General Relief</i>	3	16	11	9	39
<i>CalFresh</i>	156	160	174	173	663
<i>CalFresh and General Relief</i>	24	51	62	57	194
<i>CalWorks/CalFresh</i>	1	0	0	4	5
No. PSPs referred to DHS for Healthy Way L.A. screening	291	371	343	390	1,395

**PSP Supervision Terminations**

No. terminations -- 6 months violation-free	0	0	N/A	N/A	0
No. terminations -- 12 months violation-free (automatic discharge)	0	0	N/A	N/A	0
No. terminations -- 3 year expiration (maximum term)	0	0	N/A	N/A	0
No. terminations -- new criminal conviction	0	0	0	0	0
No. other terminations (revocation settlement, court order, etc.)	0	0	0	0	0

**Custody****Jail Population and Sentencing**

No. Court sentences pursuant to Penal Code 1170 (h)	1,124	906	760	963	3,753
No. actual defendants sentenced pursuant to Penal Code 1170 (h)	789	679	671	866	3,005
<i>Male inmates sentenced</i>	636	566	546	718	2,466
<i>Female inmates sentenced</i>	153	113	125	148	539
<i>Average length of sentence (months)</i>	24	24	24	24	730 Days
<i>Average time left to serve (months)</i>	9	9	9	9	9 Months
<i>No. sentenced to "split" sentence</i>	62	41	40	49	192
No. of sentenced N3s currently in jail					2,932
No. convicted of N3 sentenced to probation					68
No. N3s released after serving full term (as of January 31, 2012)					208
No. N3s currently on alternative custody (as of January 31, 2012)					31
No. Station Worker Program					120
No. Work Release Program					0
No. Electronic monitoring/GPS					31
No. Early Release					0

**Risk Management and Liability****Realignment Claims/Lawsuits**

No. claims/lawsuits filed with the County for any realignment related functions	0	0	0	0	0
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Los Angeles County Department of Mental Health  
 Post-Release Community Supervision Program  
 Data for PSPs Based on Release Month

CDCR Mental Health Indicator		Oct-11	Nov-11	Dec-11	Jan-12
I.	<b>DMH Population (Total Clients In Tracking System)</b>	<b>406</b>	<b>374</b>	<b>300</b>	<b>401</b>
	Prescreened, Not Assessed at HUB	100	89	79	234
	Prescreened, Assessed at HUB	142	147	129	95
	Not Prescreened, Assessed at HUB	156	134	90	71
	Not Prescreened, Not assessed at HUB, Receiving Treatment	8	4	2	1
II	<b>DMH Treatment Determination</b>	<b>406</b>	<b>374</b>	<b>300</b>	<b>401</b>
	No Treatment Needed	88	66	17	12
	Not Prescreened, Left HUB without Evaluation	28	8	4	1
	Treatment Needed	290	300	279	388
	<b>Type of Treatment Required</b>	<b>290</b>	<b>300</b>	<b>279</b>	<b>388</b>
	Co-occurring disorder	159	192	204	287
	Mental health	77	65	49	78
	Substance abuse	43	39	24	22
	Unknown/TBD	11	4	2	1
III	<b>Client Acceptance of Treatment Referral</b>	<b>290</b>	<b>300</b>	<b>279</b>	<b>388</b>
	Yes	138	145	119	118
	Released to Other Than HUB	0	2	1	2
	No	46	69	72	31
	N/A - Substance Abuse Services	16	16	11	13
	N/A- Not Seen At HUB/Not Released to Other Than HUB	90	68	76	224
	<b>Accepted Treatment by Type Required</b>	<b>138</b>	<b>147</b>	<b>120</b>	<b>120</b>
	Co-occurring disorder	86	113	93	76
	Mental health	52	32	26	42
	Unknown	0	2	1	2
IV	<b>Accepted Treatment By Level</b>	<b>138</b>	<b>147</b>	<b>120</b>	<b>120</b>
	State Hospital	0	0	0	0
	Institution for Menal Diseases (IMD)	0	0	0	0
	Inpatient++	0	2	2	2
	IMD Step Down	1	2	0	1
	Outpatient	137	143	118	117
V	<b>Post-Release Mental Health Services</b>				
	With Reported Treatment Episode in IS*	104	107	70	34
VI.	<b>Treatment By Level</b>				
	Currently In State Hsoptial	0	0	0	0
	Currently In Institution for Menal Diseases (IMD)	0	0	0	0
	With At Least One Known Inpatient Admission++	3	9	7	3
	Currently In IMD Step Down	1	3	2	2
	Outpatient Services	104	107	68	36
	Crisis Services (PMRT, UCC, PES)	34	44	20	18

++ Some Clients placed in inpatient facilities pending completion of conservatorship proceedings necessary for State Hospital/IMD Placement

\* IS data entry may lag up to three months after the month of service