Washington State Criminal Sentencing Legislative Task Force
Meeting Summary: November 18, 2019
Criminal Justice Training Center, 19010 1st Ave. S., Burien, WA

Task Force Attendees (in person unless noted):
- Judge Veronica Alicea-Galvan
- Lydia Flora Barlow
- DeVitta Briscoe
- Suzanne Cook
- Lew Cox
- Senator Manka Dhingra
- Rep. Roger Goodman
- Sonja Hallum
- Russ Hauge
- Rep. Brad Klippert
- Gregory Link
- Mac Pevey (on behalf of Sec. Sinclair)
- Judge Judith Ramseyer (on behalf of Judge Rogoff)
- Tarra Simmons
- Clela Steelhammer (attending on behalf of Elaine Deschamps)
- Nick Straley (attending on behalf of Nick Allen)
- Jon Tunheim
- Councilmember Derek Young (phone)

Facilitation Team: Amanda Murphy, Chris Page, and Molly Stenovec – William D. Ruckelshaus Center

WELCOME & INTRODUCTIONS
Project Co-Leads Chris Page and Amanda Murphy welcomed the Criminal Sentencing Task Force (Task Force) and asked members to share name, affiliation, and response to the following question: What is one topic or issue that you would like to see as the focus of a future meeting?

Responses included:
- Elimination of the accrual of juvenile record in the adult sentencing system
- BA/AA degree and education opportunities while incarcerated
- Sentencing 101 – how does the current system work?
- Ways to reduce population of incarcerated persons, including retroactive sentencing, sentencing alternatives, and post-sentence reviews
- Reentry, especially exploring ways to welcome individuals back into the community
- Opportunities to increase the quality of supervision, rather than the duration

Many members talked about the need to use data and research to inform their decisions. Some specifically mentioned the need for more data on an individual’s gender, race, geography, and convictions to better understand existing disparities. Others cited the need for information to understand the potential impacts of proposals under consideration. A few also talked about the need to collect data to monitor and evaluate the effectiveness of any recommendations made by the group. A member, while acknowledging the desire and utility of data, stated confidence in the information gained by visiting prisons and talking directly with prisoners.

Some members hope the group considers the fiscal impacts of proposals, and others want the group to consider how recommendations might affect families of crime victims. Some also expressed optimism that the group will develop policy recommendations to introduce during the 2020 Legislative Session.
REVIEW AGENDA, DISCUSSION GROUNDRULES and DRAFT MEETING SUMMARY
Due to traffic affecting the timely attendance of several members, the Facilitation Team delayed the start of the meeting and established a conference call option. The final agenda is available on the Task Force website.

The Facilitation Team reminded the group that their task is to develop policy recommendations, rather than legislative language. This meeting will focus on potential early action items related to supervision—not on drafting or editing potential legislation but discussing policy-level considerations or concerns related to each proposal. If the group agrees on a policy change, the facilitation team recommends forming a legislative work group to refine proposed legislation, consistent with the input from the full Task Force.

Decision: All Task Force members present accepted the 10/24/19 meeting summary (also on website) as final.

Amanda and Chris made the following announcements and reminders:
- At its October meeting, the Task Force requested the option to participate by videoconference for those not able to attend in person. Unfortunately, the Criminal Justice Training Center does not have videoconference capabilities. The Facilitation Team explored alternate venues but could not find one available with videoconference capabilities on such short notice. The Center has invested in a portable videoconferencing system and will have it for the December meeting.
- The finalized groundrules and operating procedures are posted on the website. Hardcopies have been included in the binders prepared for all Task Force members.
- Regarding the transmittal email and meeting materials sent on November 11, 2019: The Facilitation Team included verbiage from Kelly Leonard regarding the proposed bill language. This verbiage was not an official policy assessment from the Office of Programs & Research; therefore, it has been removed from the printed materials and documents posted on the website (see URL above).

DISCUSSION ABOUT GUIDING PRINCIPLES
Chris and Amanda presented draft guiding principles for the consideration of the Task Force. The Facilitation Team developed these principles based on the proviso’s policy goals and values expressed by the Task Force during the interviews and at their September meeting. The purpose of these principles is to serve as a framework for the Task Force to use when discussing and considering potential recommendations.

Action: The Facilitation Team will post the Guiding Principles in the “Key Documents” section of the meetings and materials website.

COMMENTS FROM THE CO-CHAIRS
- Representative Goodman thanked the members and attendees for participating in the important work of the Task Force. He expressed enthusiasm for the four early action items on the agenda and encouraged the group to consider adding Pre-Sentence Investigations and a statewide sentencing worksheet as early actions for the 2020 Legislative session. Rep. Goodman also encouraged the Task Force to consider asking the Facilitation Team to send meeting notices and materials to interested parties and media outlets.
- Lydia Flora Barlow provided a big-picture context on time and perspective. A hundred years ago, it was highly likely to die of either influenza or war; yet, from our current vantage point, she reflected that we view that time as a period of incredible growth. While the Task Force is in the midst of challenging conversations and members come to the table with diverging viewpoints, she believes that the individuals around the table have never been closer to using the same language and that a hundred years from now, people will view this time as a watershed moment of reform to the criminal sentencing system.
- Jon Tunheim was still in transit.

1 https://ruckelshauscenter.wsu.edu/meetings-and-materials-criminal-sentencing-task-force/
TOLLING OF COMMUNITY SUPERVISION TERMS
Before the presentation on tolling, Mac Pevey provided opening remarks on behalf of the Department of Corrections (DOC). He noted that every day the topics of the four early action items issues impact individuals, communities, and organizations. The current complexity of the criminal sentencing system—from the Judgment & Sentencing Forms to daily record-keeping to sentence/supervision calculations—is challenging for DOC employees to understand and navigate, and even more so for the average citizen. Some of the proposals address this complexity; all the proposals have been informed by data and research. Mac expressed DOC’s appreciation of the opportunity to present their proposals and his hope to make complicated topics simple.

Diane Ashlock (DOC) provided an overview of tolling and DOC’s proposal (presentation available on Task Force website). DOC is required to “toll” an individual for the time they are unavailable for community supervision. DOC calculates the number of days which the individual is “unavailable” and adds them to the end date of the supervision term. Thus, an individual may be on community supervision and subject to the conditions of that supervision for 12 months, but the 365 days of that supervision may not all be consecutive.

Diane shared that calculating the tolling events and the corresponding end date of a supervision term gets complicated in a variety of ways. This includes:
• DOC still needs to determine if an individual is eligible for supervision, even if the court orders it.
• DOC staff need to understand all 12 pages of rules regarding tolling and the actions that may require tolling.
• With no centralized data system, staff must use four different systems to gather information on booking dates and reasons for incarceration:
  o Jail Booking and Reporting System (JBR5): information must be confirmed to ensure it relates to the correct individual; JBR5 has no back up system if data fails to import
  o Judicial Access Browser (JABs): information from Superior, District, and Municipal courts
  o Criminal History Background Checks run through Washington State Patrol
  o DOC Offender Management Network Information System, which requires reading through case files
• DOC staff often also need to confirm information by phone, and may receive different information based on how they phrase questions.

She concluded by stating that on top of being difficult for staff to calculate, current supervision tolling also makes it hard for individuals to understand why their supervision end date often changes.

Proposed legislation: DOC would continue to toll community supervision when an individual is serving original jail time (the period of confinement required before supervision can begin) or has absconded from supervision; however, tolling would no longer occur while an individual is:
• returned to confinement;
• confined for violations of community custody if serving on a current sex offense;
• confined for a separate sentence.

The paragraphs below summarize the ensuing discussion, comments, and question/responses on tolling of community supervision terms.
• Administration of tolling: Some members raised concerns about the complexity involved with the many factors that create opportunities for errors, specifically the reliance on humans manually calculating tolling and adjusting supervision end dates combined with the number of systems those individuals must access to make those calculations.
• Resources: On fiscal impacts, some suggested that making the system easier to administer and understand is an effective use of resources. DOC encouraged the group to focus on the policy decision, rather than cost savings. Some questioned the human resources required to administer a new tolling system.
• **Intent of Supervision:** Many Task Force members asked the group to consider the intent of supervision—is it to extend a punishment? Or to support and facilitate community integration post-incarceration? If the latter, several pointed to research indicating the importance of support before release and in the first 90 days of release, rather than the length of supervision.

• **Data/Information Needs:** the group requested information about persons on supervision—race, base conviction, recidivism while on supervision, and those tolled due to new arrests, etc. DOC shared the following resources:
  o Agency facts on people incarcerated and on supervision: [https://doc.wa.gov/docs/publications/reports/100-QA001.pdf](https://doc.wa.gov/docs/publications/reports/100-QA001.pdf)
  o Additional statistics: [https://doc.wa.gov/information/data/analytics.htm#web-stats](https://doc.wa.gov/information/data/analytics.htm#web-stats)
  o Demographics of those on supervision is forthcoming.

• **Intent of Tolling:** Some observed that tolling, in part, ensures that an individual fully engages with the terms of their supervision. If a person is confined, they may not have access to programs that support community integration. Some noted that tolling, in part, holds individuals accountable for their actions while on supervision; others noted that not all crimes should automatically delay reentry and that many current tolling events may not affect public safety. Regarding the latter, some suggested that judges need to be able to consider more context, including Pre-Sentence Investigations and alternatives to incarceration.

• **Statement from Washington Association of Sheriffs and Police Chiefs, Executive Board:** Representative Goodman shared this statement on behalf of Chief Rafael Padilla, who could not attend the meeting:
  “Reform in the criminal justice system should be based on public safety outcomes and should not ignore concern for law enforcement, victims of crime, and justice. Assisting offenders with re-entry and reducing recidivism is good for public safety. Achievement of these goals are worth our state’s investment of time, money, and resources.”

• **Additional comments/reflections:**
  o If looking at tolling from a community perspective, “unsuccessful” days on supervision may be a result of difficulties in getting to their court dates.
  o Not all people convicted of a felony are eligible for supervision. Current policy requires DOC to supervise people convicted of sex crimes for the remainder of their natural life but does not allow supervision of those who may most benefit from additional support and mentoring upon release.
  o There is a tension between longer supervision terms and quality of supervision experience.
  o In addition to discussing punitive measures, the group should discuss incentives such as opportunities for individuals to reduce supervision with good “behavior.”

• Some members reflected that some tolling may not actually improve supervision outcomes, since some of the greatest barriers to good supervision outcomes lie with consecutive terms of supervision.

• The tolling proposal does not give DOC discretion to determine when tolling occurs, rather it provides much more clarity on the relationship between tolling and active supervision terms.

**Decision:** all members present accepted the following revisions to the meeting agenda:

• Concurrent Community Supervision (presentation followed by Q&A)
• Supervision Compliance Credit (presentation followed by Q&A)
• Swift & Certain Count (presentation followed by Q&A)
• After all presentations, apply the following discussion questions to each topic:
  o Anything you don’t understand or that needs more clarity?
  o Anything that concerns you or that you would need addressed before you can be thumbs sideways or up?
  o Is this bill/recommendation consistent with the Task Force principles identified in the budget proviso and draft guiding principles?
CONCURRENT SUPERVISION

Mac Pevey (DOC) provided an overview of consecutive and concurrent approaches to supervision. The graphics below recreate his whiteboard drawings.

Current statutes lack clarity on the relationships among existing supervision terms and any additional terms the court may order. The graphic shows how an individual may receive three 12-month supervision terms over the course of 2019, but current law states that (unless explicitly ordered as concurrent) the terms are served consecutively—one supervision does not start until the prior term ends; nor does the treatment that would be required as a condition of the subsequent violation.

Any tolling event(s) in 2019 would not only adjust the end date of supervision A (which could be for a drug related crime) but also adjust the start date of Supervision C (which could be for a domestic violence-related crime). Under the current system, according to Mac, DOC is not able to fully supervise an individual and account for all their needs because of the need to sequencing supervision terms and corresponding conditions (e.g., anger management or cognitive behavior therapy for domestic violence would not start until well after that violation).

DOC proposes changing the presumption from consecutive to concurrent terms of supervision. Under this approach, a judge could still require consecutive terms, but by default an individual could be “supervised” for multiple convictions at the same time. The start date of a supervision term would begin with sentencing, rather than waiting for one supervision to end. If tolling event occurs, then all supervisions are paused simultaneously.

The paragraphs below summarize the ensuing discussion, comments, and question/responses on concurrent and consecutive community supervision:

- Q: Does DOC have the computer model to be able to keep up with this system? R: Yes.
- Under consecutive supervision terms, a person cannot enroll in a program for domestic violence until they reach that point in their supervision sequence. A sentencing judge may know whether an individual is on DOC supervision and has the discretion to order concurrent supervision but must be explicitly directed.
- Q: Why did this proposal fail in the past? R: Partly due to a perception that shorter supervision terms could be seen as against public safety and partly due to opposition by Washington Federation of State Employees and the Teamsters Local 117. Some noted that this process could benefit from engaging those entities.
- Q: Would this proposal affect the adult supervision grid? R: No.
- Comment: tolling, consecutive/concurrent, positive achievement, and swift and certain response all intersect in places. These proposals should provide more clarity on what to expect during supervision.
- Q: Could you provide more information on the 24-month cap? R: While supervision terms for misdemeanor convictions must be consecutive, if someone is on misdemeanor supervision then convicted for another misdemeanor, the supervision cannot extend longer than 24 months. The cap does not apply to felony-related supervision.
Some expressed concern that while a recommendation may have good intent, the benefit or change may not actualize due to either:
  - A conflict with other existing statutes,
  - Future misinterpretation of the recommendation, or
  - Unintended consequences arising.
  
  Thus, a possible task for the legislative work group would be to map out the cascade of RCW (Revised Code of Washington) revisions and other systemic effects of recommendations.

Several stated concern about the demographics of individuals currently on supervision and those who stand to most benefit or suffer harm from proposed changes.

- **ACTION:** The Facilitation Team will forward documents and links to relevant reports from DOC.

**SWIFT & CERTAIN VIOLATION MODEL**

Mac Pevey (DOC) reviewed the existing “swift and certain” violation model and the proposed changes. In the existing Swift and Certain Count model, low-level violations (excluding the first) may result in brief confinement; the fifth low-level violation of supervision terms automatically equals a high-level violation. The proposal would eliminate the “process count,” which would allow DOC to better discern between high-level and low-level violations and to consider an individual’s behavior and stability in the community.

DOC responds differently to supervision violations for individuals on supervision for any of 21 specific underlying crimes (“Underlying 21”). Individuals on supervision for any of the “Underlying 21” who get arrested with a new crime are confined for up to 30 days, even if the prosecution never files charges. The proposal would eliminate the “Underlying 21,” which would create consistency in how DOC responds to all supervision violations.

The paragraphs below summarize the ensuing discussion, comments, and question/answers on the Swift & Certain Violation Model and the Underlying 21:

- **Regarding the Underlying 21:**
  1. If an individual has been convicted of a crime, served time, and while on supervision gets arrested for a low-level violation (e.g., stealing a candy bar or driving while license suspended), the subsequent arrest results in 30 days of confinement.
  2. Some cited the restrictions of working in a system requiring automatic actions, noting the need to consider the intent and circumstances of current actions.
  3. Others felt that some crimes and actions should be given special considerations.
  4. A few expressed the need to make a distinction between past actions, no matter how awful, and the present.
  5. The intent of this approach may have been to allow the supervision officer to make an arrest and provide time for the prosecution to gather evidence and for the pre-trial process to commence.
  6. The 30-day confinement (even if charges) are dropped may be an unintended consequence of that approach.

- **DOC already has a list of low-level and high-level violations to supervision. Neither proposal would change how the agency responds to those violations.**

- **Some suggested the following questions are relevant: How often does an individual violate supervision? How does the Underlying 21 approach affect supervision compliance?**

**POSITIVE ACHIEVEMENT TIME, aka COMPLIANCE CREDIT**

Mac Pevey (DOC) reviewed the proposal to establish a policy of Positive Achievement Time (PAT). DOC has many tools to discourage behaviors and hold individuals accountable for their actions, but no tools to encourage and

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2 For example, new offense behavior or contact with victim

3 For example, failure to report to treatment group or a positive drug test

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incentivize positive actions. Proposal: for every month of supervision compliance, an individual could earn time off their overall term of supervision. The accrued PAT could be revoked as the consequence of a violation to supervision terms.

The paragraphs below summarize the ensuing discussion, comments, and question/answers on PAT:
• This proposal would not affect individuals in any of the existing alternatives to sentencing.
• The opportunity to shorten time on supervision is an incredible motivator for many in the Drug Offender Sentencing Alternative system and other programs.
• Some suggested that PAT implies that the community corrections officer has more of a case worker model, rather than merely enforcement officer (statute currently requires the latter model). Some questioned whether DOC is the appropriate entity to provide a coaching and mentoring approach to supervision.

The Facilitators led a check-in with the group, asking each member to respond to the following questions: Where are you on these proposals? What do you hope we accomplish for the rest of the day?
• Some described the day as a crash course in complexity; others shared that, despite years of immersion on these issues, they found themselves hearing new perspectives and nuances that will inform their work.
• A few noted that the presentations included summaries of complicated issues and proposals informed by bodies of research and data, commenting that Task Force deliberations need to continue to be informed by (and build on) existing research.
• Many expressed an appreciation for the conversation, for hearing from many different perspectives on difficult topics. A few noted that while the group examined discrete proposals, they held those proposals in the larger and philosophical context of the values and purpose imbedded in the criminal sentencing system. Several voiced a need for these conversations to include more data and research.
• Some felt that the proposals wouldn’t exacerbate existing disproportionalities, while others expressed concern about a lack of data or that the proposals may not have the intended effect of reducing disparities.
• Several hope that the group could reach consensus on fundamental changes to the criminal sentencing system, while also acknowledging the huge task(s) ahead.
• Others noted that while the group may not be near agreement on all issues, they appreciate the opportunity to build relationships and hope that relationship building continues.
• On potential early action items:
  o Individuals expressed appreciation for focus on restoration and positive reentry, public safety, and that each allows for an individualized approach to accountability.
  o Many expressed hopes that the group could reach consensus on at least concurrent supervision and positive achievement time.
  o Some raised concerns with respect to tolling and swift and certain response.
  o A few voiced support for all proposals.
  o Some shared concerns that the proposals simply repackaged the existing system or that the group wouldn’t delve deeper in 2020 on issues that they “solved” at this meeting.

Amanda Murphy observed that many members talked about a need for more information and learning generally, and for the early action proposals specifically that it sounded as if the group supported pursuing recommendations on concurrent supervision and PAT. As per the agenda revision discussed earlier, the group then applied the discussion questions to each of the four topics, starting with concurrent supervision and positive achievement time due to the energy around those proposals.

**Concurrent supervision:**
• **Q:** How would the proposal differ from current policy? **R:** Currently the default with multiple terms of supervision is that they get served consecutively; the proposal would make concurrent the presumptive. This policy would apply retroactively and apply to those in supervision regardless of the level of offense.
Q: What are the distinctions among community placement, community supervision, community custody? R: These terms used to have different meanings, but now can be used interchangeably. Concurrent would apply to all types of supervision.

**Decision: all members present conveyed consensus to the following proposal:**

“The changes clarify the presumption of community custody to be concurrent for both instances in which multiple terms of community custody can exist:

1. Between multiple current counts contained in one sentencing; and
2. When individuals have a current term of community custody ordered who also still have a term of community custody from a prior, unfinished term.

The changes allow the courts discretion to expressly order terms be served consecutively. The proposal includes a provision relation to sentences that were imposed prior to the effective date of this bill which gives clear direction to DOC to set the relationship between multiple causes and/or sentences as concurrent unless the court had ordered otherwise.”

**Positive achievement time:**

Q: How would DOC calculate PAT? R: PAT could be earned based on months in compliance with the terms of an individual’s supervision.

Members shared the following concerns:

- That this will continue to disproportionally benefit white people;
- That DOC is the appropriate agency to fill role of case manager;
- That PAT could be revoked.

Some suggested that creating a new program provides an opportunity for data collection and reporting. Some suggested that revoking PAT could be a way to issue a sanction without incarceration.

**DECISION: All members present reached consensus to the following recommendation:**

“Positive Achievement Time (PAT), may only be awarded to individuals who have clearly shown positive behavior. Compliance with supervision plus completion of specific treatment, programming or reentry goals, may result in the granting of PAT. The result is that higher performing individuals will move off supervision move off of supervision more quickly, thereby allowing DOC to focus limited resources on those individuals who need it the most. DOC shall collect data by race, gender, age, location of those granted PAT and of those with PAT revoked.”

**Swift & Certain:**

In terms of concerns, members shared the following:

- That a Task Force proposal doesn’t result in DOC developing a practice of issuing more violations;
- That while an individual may need time, they also need to be held accountable for repeated violations to their supervision;
- That an automatic violation count feels arbitrary;
- That the existing SAC approach contributes to community instability; and
- That inclusion of “may” in a recommendation results in inconsistent approaches.

Some expressed a need for a Community Custody Officer (CCO) to make decisions based on the unique needs and circumstances of an individual without contributing to inconsistencies and disproportionality.

DOC has developed a supervision behavior accountability grid.

**ACTION: The Facilitation Team will forward that information to the group.**
The group considered and did not reach consensus on the following proposal: After an offender has committed and been sanctioned for five low level violations, all subsequent violations committed by that offender shall may automatically be considered high level violations.

2020 Task Force Workplan
To enable deeper dialogue on important issues and give complex topics the time and attention they deserve, the Facilitation team recommends formation of three working groups to meet between Task Force meetings and bring to the full group “first offer” proposals of how to address key challenges. The three workgroups are:
1. Reentry/supervision
2. Accuracy and the sentencing grid
3. Legislative (comprised of the Legislators and Co-Chairs to develop draft legislation in-line with the policy recommendations developed by the full Task Force).

In closing, Amanda Murphy asked each member to use one word to describe their current feelings. Members shared the following:

- Positive
- Encouraged
- Exhausted
- Encouraged
- Encouraged
- Hopeful
- Appreciative
- Hopeful
- Achievement
- Hopeful
- Willing
- Eager
- Exhausted
- Hopeful
- Hopeful
- Hopeful
- Willing
- Eager
- Exhausted
- Hopeful
- Processing

RECAP OF DECISION AND ACTION ITEMS

Task Force Decisions:
- The Task Force accepted the October 24th meeting summary as final (available on website).
- Members recommend the following policy changes:
  - Concurrent Community Supervision: The changes clarify the presumption of community custody to be concurrent for both instances in which multiple terms of community custody can exist:
    1. Between multiple current counts contained in one sentencing; and
    2. When individuals have a current term of community custody ordered who also still have a term of community custody from a prior, unfinished term.

    The changes allow the courts discretion to expressly order terms be served consecutively. The proposal includes a provision related to sentences that were imposed prior to the effective date of this bill that gives clear direction to DOC to set the relationship between multiple causes and/or sentences as concurrent unless the court had ordered otherwise.

  - Positive Achievement Time (PAT) may only be awarded to individuals who have clearly shown positive behavior. Compliance with supervision plus completion of specific treatment, programming or reentry goals, may result in the granting of PAT. The result is that higher performing individuals will move off supervision more quickly, thereby allowing DOC to focus limited resources on those individuals who need it the most. DOC shall collect data by race, gender, age, location of those granted PAT and of those with PAT revoked.
**Task Force Action Items** *(items emerging from Nov. 18th meeting are in italics):*  
<table>
<thead>
<tr>
<th>Due date/Status:</th>
<th>Members will discuss draft legislation on tolling, concurrent supervision, swift &amp; certain response to supervision violations, and compliance credit with their constituents</th>
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| Ongoing                   | *Facilitation Team Action Items* *(items emerging from Nov. 18th meeting are in italics):*  
|                           | Post the Guiding Principles in the “Key Documents” section of the meetings and materials website.  
|                           | Forward documents and links to relevant reports from DOC on individuals on supervision.  
|                           | Forward supervision behavior accountability grid used by DOC.  
|                           | Provide information on potential early action items (tolling, concurrent supervision, swift & certain, compliance credit) to Task Force members by November 1, so members can meet with their constituencies prior to the November meeting. |
|                           | Sent by email on 11/1  
|                           | Provide remote meeting participation option. |
|                           | Available for Dec. 6th meeting.  
|                           | Share report mentioned by Senator Dhingra: *Reducing Recidivism with Technology: State of Arkansas and SAP Co-Invention 2019*  
|                           | Develop 2020 meeting schedule which follows pattern of first Thursdays but also considers holidays.  
|                           | Sent by email on 11/1 and posted on website. |
|                           | Follow up with members unable to attend October meeting. |
|                           | Left voicemails/messages with all individuals 10/28  
| **Task Force Parking Lot** *(items emerging from Nov. 18th meeting are in italics):*  
| Due date/Status:          | would like to revisit practice of showing up to jobs with full armor,  
|                           | lack of access to legal support while in supervision  
|                           | monitoring/evaluation and data collection – what other parts of the system should we be evaluating?  
|                           | Sentencing worksheet  
|                           | Pre-Sentencing Investigations |