Local Jails Reporting Program: Feasibility Study

Final Report

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About This Report

The following report provides the Bureau of Justice Statistics (BJS) with the findings and recommendations from the Local Jails Reporting Program (LJRP) feasibility study. The project is funded as part of the BJS Statistical Support Program (SSP), awarded to Abt Associates as a cooperative agreement in 2019 (award number ***2019-85-CX-K002***). The SSP serves to support BJS with a broad range of statistical and methodological research to further BJS's mission to "collect, analyze, publish, and disseminate information on crime, criminal offenders, victims of crime, and the operation of justice systems at all levels of government." BJS utilizes the SSP to focus on three overarching objectives: filling gaps in current BJS collections, restoring discontinued collections, and addressing emerging criminal justice issues.

The purpose of the feasibility study is to identify the issues and challenges involved in developing an individual-level, inmate administrative record collection from local jails across the country. The results of this study will be used to determine if it will be feasible for BJS to pursue a future pilot study to collect data from a limited number of jails in the coming years. The goal of the pilot study is to better understand the appropriate design and other challenges that would be encountered if BJS determines it is feasible and necessary to pursue a national collection.

The following report provides an introduction to the call for a feasibility study, the methodology, a snapshot of participating jails, the findings from the study, and a discussion of recommendations for next steps.

Authors

Seri Irazola, Ph.D., conducted and authored the feasibility study; Dr. Irazola is a Principal Associate for Abt Associates. The SSP Project Director, Tom Rich, provided ongoing technical support throughout the project; Mr. Rich is also a Principal Associate for Abt Associates. The report was reviewed by the Project Quality Assurance (PQA) representative, Walter Campbell, Ph.D., a Senior Associate for Abt Associates. Dr. Irazola conducted all interviews, and she was supported in the interviews by: Katherine Armstrong, Meg Chapman, Tom Rich, and Elyse Yarmosky.

BJS staff also provided ongoing technical support and conducted all outreach activities.

CONTENTS

ATTACHMENTS

1.   Introduction[1]

The Bureau of Justice Statistics (BJS) is the primary statistical agency of the United States Department of Justice (DOJ). BJS collects, analyzes, publishes, and disseminates information on crime, criminal detainees, crime victims, and criminal justice operations. As part of the corrections agenda, BJS currently obtains data on the local jail population through establishment censuses and surveys, specifically the Census of Jails[2] and Annual Survey of Jails,[3] and personal interview surveys, specifically the Survey of Local Jail Inmates (SILJ)[4] and the National Inmate Survey.[5]

In 2020, BJS directed Abt Associates (Abt) to conduct a feasibility study to explore the collection of individual-level data based on jails' administrative records: Local Jails Reporting Program (LJRP). The LJRP Feasibility Study was contracted using the Statistical Support Program (SSP) – a cooperative agreement awarded to Abt Associates in 2019 to support BJS with specific statistical tasks. LJRP is modeled after BJS's National Corrections Reporting Program (NCRP),[6] which collects prisoner-level administrative records from state departments of corrections. A jail administrative record collection would have several significant advantages over BJS's current jail collection vehicles. First, it would allow BJS to obtain data that are difficult to aggregate and therefore impractical to collect through jail establishment surveys, such as information on bail, offense/charge, and detailed detainee demographic and case characteristics. Second, it would allow BJS to collect data on the detained pretrial population, a group that Congress asked BJS to focus on in recent appropriations bill (below), but is difficult to sample through detainee self-report surveys due to short stays in jail. Third, it could provide individual identifiers to link jail detainees to other administrative records, such as the NCRP or records of arrest and prosecution (i.e., RAP sheets), for conducting recidivism studies among jail detainees.

In the spring of 2020, BJS was tasked with collecting information specifically on the pretrial jail population by the Subcommittee on Commerce, Justice, Science, and Related Agencies:

> *The Committee directs the Bureau of Justice Statistics to collect information analyzing the population of individuals detained pretrial in local jails, State and Federal facilities, and private facilities under contract to Federal, State, and local authorities and report back to the Committee within 180 days of the date of enactment of this Act. The report should include the number of individuals detained pretrial; the median duration of the*

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[1] This section is largely based on the Office of Management and Budget (OMB) package submitted by BJS for the feasibility study. See **Attachment A** for the submitted OMB package.
[2] OMB Control # 1121-0100.
[3] OMB Control # 1121-0094.
[4] OMB Control # 1121-0098.
[5] OMB control # 1121-0311.
[6] OMB Control # 1121-0065.

pretrial detention period; the number of individuals detained pretrial who were offered financial release or not offered financial release; and the number of individuals who were offered financial release but remained detained because they could not pay the amount required. All data should be disaggregated by demographic and the level of the offense charged.

The feasibility study was key to understanding how BJS can fulfill the Congressional reporting requirement on the pretrial population, including information on disposition on a criminal record, duration of the pretrial detention period, bail amount, charge types or codes, etc.

The feasibility study is an extension of prior BJS's efforts at exploring a jail administrative record collection. In 2017, as part of the SILJ redesign, BJS conducted a small pre-test, the SJAR, to determine whether BJS could obtain individual-level jail administrative records on detainees sampled for the SILJ survey. The goal was to potentially allow BJS to reduce total respondent burden and interview length, by obtaining the data more efficiently from jails if the detainee records were already part of the administrative records maintained by the jails. During the SJAR pre-test, BJS selected 40 local jails of various sizes to assess whether specific data elements were collected through their detainee management systems, and whether and how the facilities could provide data for the specific elements to BJS. Only 25 jails responded to the survey, and the percentage of jails that could provide individual-level administrative data to BJS ranged from 93% for individual demographic and current commitment characteristics, to 64% for sentencing information. Ultimately, BJS did not field the full SJAR due to the low response rate to the pre-test and a lack of resources to sample more jails.

Unlike the SJAR pre-test, which aimed to collect specific data elements to supplement the self-report data BJS is planning to collect through the SILJ in 2022, LJRP is broader in scope and the goals are different. This project will explore the feasibility of developing an individual-level jail administrative record collection in the long term, which if feasible, could eventually become a core BJS jail collection.

2.   Methodology

To conduct the feasibility study, BJS conducted outreach out to selected jails to solicit participation; once participation was obtained, BJS asked Abt to conduct telephone interviews with a jail representative selected by the jail administrator. Interviews were guided by a semi-structured interview drafted in partnership with BJS and Abt, and approved by BJS (see **Attachment B** for the interview instrument).

2.1   Sample Design

The design employed a convenience sample to select jail respondents from the approximately 3,000 jail facilities in the United States, which were enumerated in BJS's 2019 Census of Jails. The goal was to recruit 20-25 jails that varied in average daily detainee population (e.g., 1-49 detainees, 50-249, 250-999, and 1000+), geographic diversity (state and region), and community size (rural and urban). To account for nonresponse, fifty jails were contacted to yield up to 25 completed interviews.

Fourteen jurisdictions were recruited to participate in the Feasibility Study, with a mix of urban (64.3%) and rural (35.7%) jurisdictions. Nearly half (6, or 42.9%) were located in the West; four sites (28.6%) were located in the South, three sites (21.4%) were located in the Northeast, and one site (7.1%) was located in the Midwest. The mid-year population (based on BJS's 2019 Census of Jails) ranged from ▇ detainees to ▇▇▇, with an average of 1,354 detainees. Annual admissions for the interviewed jails ranged from ▇▇ detainees to ▇▇▇, with an average of 17,137 annual admissions. The total bed-count for the participating jails in 2019 ranged from ▇ to ▇▇▇, with an average of 2,000 beds.

Schedule

In mid-October 2020, BJS submitted the clearance package to OMB, and in early November, BJS notified Abt that OMB approval had been granted. BJS then emailed the selected jails an invitation letter with a list of FAQs intended to provide: (a) further information on BJS and Abt; (b) topic areas of questions that will be asked during the interview; (c) how the information provided will be used by BJS; and (d) the confidentiality and security provisions that govern information collected by BJS. After the invitation letter was sent, BJS followed up with the jail administrators by email or phone as needed to encourage participation in the study. Once a jail agreed to participate, BJS connected the jail's contact person with Abt to schedule the interview. Interviews with transcribed notes began in November and continued through December. Data was entered, coded, and analyzed in January, and the draft report was submitted to BJS in mid-January. ***Exhibit 1*** depicts this schedule.

Exhibit 1.   Actual Study Schedule

Feasibility Study Schedule (Actual)	
October, 2020	BJS submitted OMB package
November 2, 2020	Upon receiving OMB approval, BJS initiated outreach to jails to obtain participation
November – December, 2020	BJS continued to solicit participation from jails; Abt conducted interviews, transcribed responses, and coded key themes by group
January, 2021	Abt entered data, extracted and coded key themes by group; wrote draft report
January 22, 2021	Abt submitted draft deliverables to BJS for review
March, 2021	All deliverables finalized with BJS approval

2.2   Snapshot of Jails

Fourteen jurisdictions participated in the study. A snapshot of each is exhibited below.

Exhibit 2.   ▮▮▮▮▮▮▮▮▮▮▮

▮▮▮▮▮▮▮▮▮	
Rural / Urban	Urban
Type of Vendor	External vendor (heavily-modified off-the-shelf)
Name of Vendor	Police Central
Name of System	Jail Management System (JMS)
Years with Current System	More than 10 years
Plans to Switch System	Yes – one to two years

Exhibit 3.   ▮▮▮▮▮▮▮▮▮▮

▮▮▮▮▮▮▮▮	
Rural / Urban	Urban
Type of Vendor	External vendor
Name of Vendor	Tyler Technologies – *New World Corrections* module
Name of System	Jail Management System (JMS)
Years with Current System	5 to 10 years
Plans to Switch System	No plans to change system

Exhibit 4. ██████████

██████████	
Rural / Urban	Urban
Type of Vendor	In-house
Name of Vendor	N/A
Name of System	Tag
Years with Current System	5 to 10 years
Plans to Switch System	Yes – one to two years

Exhibit 5. ██████████████

██████████████	
Rural / Urban	Rural
Type of Vendor	External vendor
Name of Vendor	Sun Ridge
Name of System	RIMS
Years with Current System	5 to 10 years
Plans to Switch System	No plans to change system

Exhibit 6. █████████

█████████	
Rural / Urban	Urban
Type of Vendor	External vendor
Name of Vendor	Spillman
Name of System	Jail Management System (JMS)
Years with Current System	5 to 10 years
Plans to Switch System	No plans to change system

Exhibit 7. ███████████████

Rural / Urban	Urban
Type of Vendor	In-house
Name of Vendor	N/A
Name of System	Offender Management System (OMS)
Years with Current System	2 to 5 years
Plans to Switch System	No plans to change system

Exhibit 8. ███████████████

Rural / Urban	Urban
Type of Vendor	In-house
Name of Vendor	N/A
Name of System	Inmate Information System (IIS)
Years with Current System	More than 10 years
Plans to Switch System	Yes –two to five years

Exhibit 9. ███████████

Rural / Urban	Urban
Type of Vendor	External vendor
Name of Vendor	Inagraph / Hexagon
Name of System	Jail Management System (JMS)
Years with Current System	More than 10 years
Plans to Switch System	Yes – in process of changing

Exhibit 10. ██████████████

██████████████	
Rural / Urban	Rural
Type of Vendor	External vendor
Name of Vendor	Global Telelink
Name of System	Jail Management System (JMS)
Years with Current System	More than 10 years
Plans to Switch System	No plans to change system

Exhibit 11. ████████████████████

██████████████████	
Rural / Urban	Urban
Type of Vendor	In-house
Name of Vendor	N/A
Name of System	Jail Information Management System (JIMS)
Years with Current System	More than 10 years
Plans to Switch System	Yes – two to five years

Exhibit 12. ████████████████

██████████████	
Rural / Urban	Rural
Type of Vendor	External vendor
Name of Vendor	Arconics
Name of System	X-Jail
Years with Current System	2 to 5 years
Plans to Switch System	No plans to change system

Exhibit 13. ██████████████████████

██████████████████████	
Rural / Urban	Rural
Type of Vendor	In-house
Name of Vendor	N/A
Name of System	Jail Web
Years with Current System	More than 10 years
Plans to Switch System	Yes – one to two years

Exhibit 14. ██████████████████████████

██████████████████████████	
Rural / Urban	Urban
Type of Vendor	External vendor
Name of Vendor	GTL (legacy-version released in 2004 – originally DSI)
Name of System	Offender Management System (OMS)
Years with Current System	More than 10 years
Plans to Switch System	Yes – in process of changing

Exhibit 15. ██████████████

██████████████	
Rural / Urban	Rural
Type of Vendor	External vendor
Name of Vendor	E M Solutions
Name of System	Jail Management System (JMS)
Years with Current System	More than 10 years
Plans to Switch System	No plans to change system

3. Findings

The findings are outlined below; this includes data on detainees that are tracked and timestamped, system-tracked characteristics, detainee transfer and administration of data, length of time to extract data for one year, and length of time to extract data on all confined detainees for one point in time.

Tracked Detainees and Timestamps

To understand what jail populations were "tracked" by the jail management systems (JMS), specific questions were asked around whether *pretrial* detainees, detainees *held for other jurisdictions*, and *sentenced* detainees were followed in the management systems.

Exhibit 16.   Tracked Detainees and Timestamps

Detainees for Other Jurisdictions	
Yes	92.9%
No	7.1%
Other/Unknown	

Pretrial Detainees	
Yes	78.6%
No	21.4%
Other/Unknown	

Sentenced Detainees	
Yes	92.9%
No	7.1%
Other/Unknown	

Other Detainees Tracked	
Yes	50%
No	50%
Other/Unknown	

From the collected data, nearly all sites tracked detainees of interest to BJS for the LJRP, and half of the sites tracked information on other categories of detainees. Therefore, it may be that the majority of the nation's 3,000 jails' systems will have the capacity to support the LJRP.

Of all sites queried, 78.6% of the systems were able to immediately *differentiate between statuses/categories of detainees*. The remaining sites were able to identify the statuses/categories of detainees, but only after clicking through several screens.

All of the fourteen jail management systems were able to *differentiate between temporary and non-temporary releases*.

Nearly all of the participants' *admissions and releases were timestamped*; only one site was unsure of both. However, only nine of the fourteen sites management systems tracked *date/timestamped arrests*. For the remaining four sites, arrest information was located in the law enforcement data management system, but not the jail system

All but one site had the ability to *track detainees over time to identify repeat detainees*. The site that was unable to track repeat detainees because no unique identifier was assigned to detainees.

System-Tracked Characteristics

The purpose of Section II of the interview instrument is to capture the different data components of interest to BJS within each of the jurisdictions jail management system (JMS).[7] Each data point collected is reported below.

Exhibit 17.   System-Tracked Characteristics

Variable	Yes (%)	No (%)	Other/Unknown (%)
Full name	14 (100%)	0 (0%)	0 (0%)
Date of birth	14 (100%)	0 (0%)	0 (0%)
Race & ethnicity	14 (100%)	0 (0%)	0 (0%)
Citizenship*	7 (50%)	5 (35.7%)	2 (14.3%)
Education*	10 (71.4%)	2 (14.3%)	2 (14.3%)
Occupation*	12 (85.7%)	2 (14.3%)	0 (0%)
Fingerprint-backed ID	11 (78.6%)	1 (7.1%)	2 (14.3%)
FBI number	10 (71.4%)	2 (14.3%)	2 (14.3%)
Full SSN*	13 (92.9%)	0 (0%)	1 (7.1%)
Partial SSN*	13 (92.9%)	0 (0%)	1 (7.1%)
Criminal history	6 (42.9%)	3 (21.4%)	6 (42.9%)
Initial arrest date	11 (78.6%)	2 (14.3%)	1 (7.1%)
Arrest charge(s)	12 (85.7%)	2 (14.3%)	0 (0%)
Court docket number	12 (85.7%)	0 (0%)	2 (24.3%)
Arraignment date	12 (85.7%)	2 (14.3%)	0 (0%)
Filed charges	13 (92.9%)	0 (0%)	1 (7.1%)
For PRETRIAL detainees only			
Variable	Yes (%)	No (%)	Other/Unknown (%)
Timestamp of admissions	12 (85.7%)	1 (7.1%)	1 (7.1%)
Whether bail was ordered?	12 (87.7%)	2 (14.3%)	0 (0%)
Bail payment amount	12 (87.7%)	2 (14.3%)	0 (0%)
Released on bail/bond?	12 (87.7%)	2 (14.3%)	0 (0%)
Released on pretrial?	10 (71.4%)	3 (21.4%)	1 (7.1%)
Whether/when detainee had provocation	6 (42.9%)	5 (35.7%)	2 (14.3%)
Adjudication charges	10 (71.4%)	3 (21.4%)	1 (7.1%)
Holding-agency's name	14 (100%)	0 (0%)	0 (0%)
Holding-agency detainee start-date	11 (78.6%)	2 (14.3%)	1 (7.1%)
Holding-agency detainee release	11 (78.6%)	2 (14.3%)	1 (7.1%)

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[7] Across the sites, the JMS's had different labels, such as detainee management systems (OMSs) or other variations including detainee information systems (IMSs). For consistency across this report, we refer to all detainee management systems as "JMS."

* Some or all of reported data is self-reported and therefore not considered reliable.

For SENTENCED detainees only			
Variable	Yes (%)	No (%)	Other/Unknown (%)
Sentence length	13 (92.9%)	1 (7.1%)	0 (0%)
Charges	13 (92.9%)	1 (7.1%)	0 (0%)
Fines imposed as part of sentence	5 (35.7%)	7 (35.7%)	2 (14.3%)
Date of admission following sentencing	10 (71.4%)	2 (14.3%)	2 (14.3%)
Whether detainee released temp-release	10 (71.4%)	2 (14.3%)	2 (14.3%)
Date/timestamp of release	11 (78.6%)	1 (7.1%)	2 (14.3%)
Type of release	13 (92.9%)	0 (0%)	1 (7.1%)
Date re-admissions following conditional release	12 (85.7%)	2 (14.3%)	0 (0%)

Transfer and Administration of Data

To successfully share data with BJS, Section III of the instrument asked questions related to the mechanisms that would be used to implement a data-sharing agreement (DSA), memorandum of understanding (MOU), or data-use agreement (DUA), as well as the challenges to implementing a partnership, and potential challenges and remedies. The following sub-section outlines the findings.

MOU, DSA, and/or DUA

Just over half of the fourteen sites (8) reportedly had an existing MOU for some current or former partner or agency, while three (3) had never entered into any formal data-sharing agreement, and the remaining three (3) were unsure if they'd ever entered into any formal agreement to share data. It was clear the sites had nuanced differences in their use and execution of MOUs. Specific examples include:

➢ One site had a DSA in use with other counties within the state, but that instrument would not apply to other Federal agencies including BJS.

➢ One site used an MOU for permanent data transfers; however they do not share data outside of law enforcement.

➢ At least four sites have "standard language" or "existing templates," however they would want the receiving agency (BJS) to present their own template to request data.

➢ More than five sites also reported a desire for a standardized data sharing agreement to securely share data.

➢ At least two sites have existing data agreements to facilitate grants issued from DOJ with universities and research organizations, and therefore would be glad to use those instruments.

- One site participated with DOJ's National Institute of Justice (NIJ) to jointly draft an MOU (please see **Attachment C** for a sample MOU).

- Only one site (with the average daily population under 70 detainees) reported that such a data agreement would be difficult or impossible to do because the "formality of signing something would freak out many in the county."

Legality of Providing Data

Three questions were asked pertaining to whether BJS may have any major **legal challenges** to providing individual-level data from the fourteen sites to BJS: (1) Could BJS legally access data with no personally identifying information (PII)? (2) Could BJS legally access data with PII? And (3) Could BJS legally access data with *unique* PII? PII and unique PII were specifically distinguished from each other to determine whether it was possible to obtain data beyond name and data of birth (traditional PII) to include sensitive data on fingerprint-backed identifiers and social security numbers (unique PII).

Data without PII. Nearly all sites – thirteen of fourteen (92.9%) – reported there would be no known legal challenge to providing BJS with data on detainees without PII. The remaining site was unsure whether or not they could legally provide this data to BJS.

Data with PII. Just over half of the sites – eight of fourteen (64.3%) – reported that they could legally provide BJS data with PII. One site reported they could not legally provide BJS with PII-data, and five sites (35.7%) were unsure if they could provide BJS with data with PII.

Data with Unique PII. Only five (35.7%) of the sites reported that they could legally provide BJS with data that included unique PII. Two sites (14.3%) reported that they could not legally provide BJS with data that included PII, and half of the sites (50%) were unsure.

Remarks on Legality of Accessing Data. Many of the sites interviewed provided clarification on their "unknown" answers. Nearly all of the sites that answered "unknown" for providing data with PII and data with unique PII reported that *they had to consult with their legal counsel* to understand what could be provided. These same sites indicated that *they had not shared data with external agencies in the past*, and certain data elements (e.g., arrest data that were not included in their databases, etc.) may be harder to legally share than other data elements. Most importantly, these sites stated that *with a strong MOU, they believed they would be able to share both data with PII and unique PII.*

Technical Challenges to Providing Data

To understand technical challenges, we asked whether or not the sites could identify or anticipate any major challenges to providing the data to BJS. Nearly half (6 sites, 42.9%) reported that they did not foresee any major technical challenges. Half of sites (50%) reported they would have major technical challenges, and one site (7.1%) reported they were unsure.

Themes from Technical Challenges. The technical challenges that were identified centered on **four key themes**:

(1) How the data would be provided and/or accessed: some sites expressed trepidation regarding whether BJS would expect a "data dump" or whether BJS would want to access their data directly. Both had challenges that may need to be overcome; for example, if the former, the site was concerned how the data dump would be provided (i.e., zip-drive, CD, and/or how it was secured when being transferred).[8] Whereas the latter had to do with outsiders wanting access to their internal system and data, and the reservation they had with how that would be done and how data would be protected.

(2) The size and what data would be provided: a key theme among almost all sites that expressed they would have major technical challenges was around how many variables (volume) would be included, how often they would be asked to pull the data (frequency), and how difficult it may be to produce code to answer questions they do not already report on.

(3) The burden on resources: several sites expressed concern regarding the small size of their staff, a lack of staff to pull the data, and the lack of resources to provide data. At least two sites indicated that because they used a 3rd party vendor, they would have to pay the vendor to pull the data, and that would be an added cost that was not accounted for in their budget.

(4) Hard to access/provide data: at least two sites stated that their system was "older," "difficult," and even had "paper files that would need to be entered into a system." One rural site expressed that they did not have broadband, so internet would be a challenge if BJS expected them to email the data.

Management Challenges to Providing Data
To understand technical challenges, we asked whether or not the sites could identify or anticipate any major management challenges to providing the data to BJS. Eleven sites (78.6%) reported that they did not foresee any major management challenges. Only three sites (21.4%) reported they would have major management challenges, and no sites reported they were unsure

Themes from Management Challenges. The management challenges that were identified centered on **staffing and resources**. One site expressed concern in getting "buy-in" from overburdened staff. Another site discussed the issue of oversight; because they had a large jail population they had a lot of data coming in and out of their JMS, and therefore needed manpower. The third site expressed that staffing was a concern and "the request would need to be filled during down-time," which meant it may be de-prioritized.

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[8] Abt Associates has a private file transfer site that is used to securely protect data. Should BJS choose to move forward on the LJRP, this information would be provided in a DUA-template to assuage any concerns from participating jails.

Reducing Challenges to Providing Data

To understand how to reduce challenges, we asked whether BJS may be able to provide assistance to reduce any identified legal, technical, and/or management issues. Only two sites (14.3%) said they would require nothing from BJS to reduce any stated challenges; one other site (7.1%) reported they were unsure. Nearly all (11 sites 78.6%) reported that BJS could assist in reducing the challenges.

Themes from Reducing Challenges. To reduce challenges with the assistance of BJS, the key themes that were identified centered on **resources**. Over half of the sites that identified BJS could assist in reducing challenges stated that funding would be critical – either to provide the staff to easily extract the data, and/or to provide funding for their vendor to modify their JMS to provide the capability to provide the data. Other necessary resources may include: BJS providing their DUA template to jails that clearly states the purpose of why BJS wants the data and how it would be used; ensuring they had a BJS point of contact who was "responsive and patient;" and BJS providing "a clear set of requirements from BJS." One site that had not provided data outside their jurisdiction before and had expressed concerns with "what the feds would do with their data" had two specific asks: "We'd need a letter from Barr [Attorney General at time of interview] that grants indemnification that says if something happened to the data, we wouldn't be held responsible. And we'd want to know what's in it for us."

Length of Time to Extract Data for One Year.

To gauge the length of time to extract data for all detainees for the period of one year, respondents were asked: *How long would it take you to create an individual-level data extract that contains your jail's booking records for a period of one year? You may use 100 fields per record for estimating purpose.*

Nearly 80% of sites answered they would be able to provide the data under one month. However, it is critical to understand that many sites expressed that the front-end development would be the time-consuming part (e.g., writing the code to pull the reports), and that once their code had been generated, it would be under a week to pull the extraction; these instances are denoted with an asterisk (*). Answers by timeframe are below.

Under one week: 8 sites (57.1%)

➢ "A couple days, mostly for formatting. We could export into Excel or Google Sheets to create a flat-file. It'd be very easy if we don't have anyone accessing our network – we have a CSV extraction tool we can use."
➢ "Approximately a week."
➢ "A couple hours to a couple of days."
➢ "Depends on the variables. We could provide at least 25 fields now that we have already programmed."*
➢ "Fairly quickly unless we have to pull from multiple apps and other data sources."*

- ➢ "I could run a report now. It depends on the number of records in a year booked – I can do about 1,000 records at a time. It wouldn't take more than a week, especially since we are booking less detainees since Covid."*
- ➢ "No longer than a day."
- ➢ "To generate reports, it takes about a day; more if we don't have the direct field you request."

Two weeks to one month: 3 sites (21.4%)

- ➢ "Probably two to three weeks."
- ➢ "Probably two to three weeks. With our current system, it depends on how we structure the dataset. Within a booking, you can have 'immediate releases[9]' that get messy and hard to identify. If you don't need the immediate releases, it could take two weeks. If BJS wants to include the immediate releases, I haven't been able to do this reliably. All our data is entered manually and transcribed from paper documents, so that becomes an issue too. Our jail is extremely sensitive to releasing large amounts of data in fear of being sued."*
- ➢ "Unsure, but I think 30-days."*

Up to six-months: 3 sites (21.4%)

- ➢ "80 to 120 hours over a six-month period."
- ➢ "This is a long-term task that would require pulling in others to extract information. If the field search was very basic, it could be done in-house and could take approximately two-weeks. It may require the County's Information Services Division (ISD) to write code, and that could take an additional two to four weeks. Once that code is written, it'd be easy to dump the information as needed."*
- ➢ "Up to six-months."

Length of Time to Extract Data on All Confined Detainees for One Point in Time.

To gauge the length of time to extract data for a single point in time, respondents were asked: *How long would it take you to create a data extract that contains individual-level data on all confined detainees at a specific time and day? You may use 100 fields per record for estimating purpose.*

Nearly 80% of sites answered this task would be much easier than the first scenario. Like the last scenario, the sites expressed that the front-end development would be the time-consuming part (e.g., writing the code to pull the reports), and that once their code had been generated, it would be under a week to pull the extraction; these instances are denoted with an asterisk (*). Answers by timeframe are below.

Within a day: 8 sites (57.1%)

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[9] Interview respondent was referring to "temporary" releases, which would not necessarily be a hindrance to the LJRP collection.

Two days to one week: 2 sites (14.2%)

One week to one month: 2 sites (14.2%)

Other: 2 sites (21.4%)

➤ "The issues isn't the data and time – it's in generating the first reports. Once we have all the fields identified, one date or one time doesn't matter. But it does depend on which data fields are requested."*

➤ **"**Like before: this is a long-term task that could be done in-house and could take about two to four weeks. Once that code is written, it'd be easy to dump the information as needed."*

4. Discussion

The overall enthusiasm for collecting administrative data from jails was high; it was clear that nearly all interviewees and sites wanted to figure out how to overcome their challenges in order to participate in such a collection. This was especially true in the larger jails that were interviewed. Nearly all understood the importance of the data to their own jail management and how their jail would use the data, which was driving their desire to participate. However, there were clear issues that stood out to hinder the process of participating in the LJRP data collection, which can easily be overcome with assistance and guidance. Aside from the challenges that sites would need to overcome, there were several key themes that arose from the seven sites (50%) that anticipated changing their system or vendor in the next few years. These issues, along with recommendations for next steps, are discussed below.

4.1 Challenges to Overcome

Upon analyzing the data, several key themes of challenges were made apparent. First and foremost – nearly all sites expressed concern with **the front-end setup of the data**. These sites acknowledged that they had the ability to provide data, however before that could happen, they needed to modify or add code to be able to produce the data as-asked. Sites expressing this concern said that once the code is written and the report has been produced, subsequent data requests could be promptly pulled and provided to BJS. In some sites, the concern was around resources to write the code – whether it be staffing or funding. It is important to note that no routine data collections exist without a startup effort and/or cost to participating sites. Once those costs are met and the jail system is prepared to accommodate future data requests, the succeeding burden is typically minimal.

Secondly, and similar to the first challenge, issues arose with **whether the jail management system was in-house or outsourced with an external vendor**. When asked questions about technical challenges, those sites with in-house systems had more confidence that they would be able to provide the data or build in additional data elements as needed to support a BJS data collection effort. However, those with external vendors expressed concern that they were limited in what could be added or changed; the external systems were either too cost-prohibitive to modify, or too rigid. This scenario is similar to BJS's collection for the NCRP, whereby a small number of Department of Corrections (DOCs) had to be paid to produce the NCRP files.

Thirdly, the smaller and more rural jurisdictions that were interviewed were more likely to have challenges with their management system's **infrastructure**. For example, these sites had issues such as having paper-files rather than electronic files, limited broadband and internet, and were ill-equipped and/or understaffed to produce the data. That said, the larger sites indicated there would be minimal infrastructure challenges.

The fourth theme that arose was on the **management of the jail and its relationship with the function of law enforcement**. Jails with sheriffs that also had a law enforcement role tended to

have arrest data and other relevant data elements related to the individual – such as criminal history, SSN, and other information that would be in an arrest record. With sites that had jails and sheriffs for confinement purposes only, the police departments tended to have the detainee's information and that information was held in a separate database that would need extra permissions to obtain. (Note: jails still had data on detainee name, date of birth, and typically SSN.) To obtain data from these separated entities would take coordination with both the jail and the police, which may prove to be difficult. Moreover, the quality and accuracy of the data may depend on who, where, and when the data is entered. Having multiple datasets that do not "talk to each other" may prove to be an ongoing challenge.

To a lesser extent, challenges related to the **Coronavirus (COVID-19)** were discussed. For example, several sites discussed general challenges with the accuracy of data due to the significant fluctuation in their population due to COVID-19, and the thought that the population may not "stabilize" for a long period of time. COVID-19 also had an impact on staffing in at least one jail, which caused challenges around the manpower for the jail to provide the data. And finally, one site expressed concern with providing the data to any entity – but especially the Federal government – due to distrust of how the data would be used. While this is not a direct challenge, it may be a theme that arises as more jails are approached to participate in the LJRP.

4.2 Themes from Transitioning Systems

As stated previously, half of the sites interviewed were either in the process of transitioning their JMS (2 sites), or anticipating a change in the next few years (5 sites). **Contributing factors** to whether the site intended to change their system ranged; these factors included transitioning to a cloud-based storage system; selecting a more user-friendly system; finding a more robust system that had large data storage and functionality for reporting; and creating a system that had the ability to "speak to" other databases of interest – such as police- and court-data. The sites that were in the midst of transition or planning to transition expressed **interest in assisting BJS** – whether it be by piloting the effort or obtaining the data elements BJS is interested in collecting and ensuring they are included in their new system.

4.3 Recommendations

To move forward, we have provided three key recommendations that BJS may want to consider as next steps, prior to further exploring the feasibility of a national data collection in local jails.

BJS to Issue Formal Data Request. The first recommendation that is based on the telephone interviews is that BJS should issue formal data requests to a subset of the interviewed sites. This would enable BJS to determine: (1) the level of effort required to obtain and process the data, and (2) demonstrate value of the effort. The first point is critical for determining the feasibility of a national collection, while the second is important to get more jails to participate. As part of this request, BJS should also contact two to three of the 3rd party vendors who maintain control of the sites' data to determine the level of effort and the cost associated with making changes to the variables collected and/or code needed to produce reports that meet the needs of the LJRP.

Conduct Scan of Practice. It was clear that the sites had varying policies guiding their practices, varying statutes by jurisdiction, and different data elements that were required by a higher entity (typically to the state). A scan of practice or environmental scan would provide a snapshot at the range of these practices in the local jails to understand what they collect, for who, and why (i.e., how the data is used). For example – one site interviewed shared that "we should get the data from the state because of the Data Transparency Act across the state." The Act requires all jails to report up to the state on standardized data, thus streamlining the collection for BJS. A scan of practice would also identify core measures that could be easily collected by local jails (e.g., variables that are already collected), and ensure that the variables have the same definitions. In addition, the scan of practice should contain site visits so that the data systems and reporting tools are as-reported. It will also further reveal the local jails that are changing or transferring their management systems, so that they are more user-friendly to provide BJS with ongoing data.

Reducing Burden on Local Jails. As stated previously, the jails in the study were enthusiastic about participating in the collection, however several faced impediments that BJS can help to address. First, BJS may want to consider providing funding (or asking their sister agency the Bureau of Justice Assistance to provide funding) to assist jails in the first collection. The front-end work seemed to be the largest obstacle for the sites, and funding was identified by nearly all participants as a way BJS could reduce burden. The funding could assist in additional manpower to write and/or change code to ensure the data that is being reported to BJS is what BJS wants. The funding may also provide local jails with external vendors the ability to make the changes without taking money from the jurisdictions' budgets.

Another way to reduce burdens for the local jails is to create a standardized and comprehensive MOU/DUA for each jail to utilize. Most jails either had no MOUs or had "pieces" based on other MOUs for different projects. And because many sites were concerned their legal counsel would be a challenge, providing a template that has adequately addressed how the data will be used, the protections on the data, and why the collection is important, would be helpful to reduce burden.

BJS may also want to consider implementing something similar to their probation and parole efforts, which have both short- and long-forms; for those facilities that are overly burdened, the short form would be sufficient and focus only on the "core measures" that would be identified in a scan of practice.

The jails want to participate in the LJRP. Overall, if BJS can assist with better understanding the lay-of-the-land, and reducing burden on the jails to increase participation, both BJS and the jails would be better equipped to ensure a high response rate for a successful collection. We recommend BJS build on the feasibility study with formal data requests to be issued to the participating sites, so as to further understand the challenges and solutions.

U.S. Department of Justice

Office of Justice Programs

Bureau of Justice Statistics

Washington, DC 20531

Dear [NAME OF SHERIFF/ADMINISTRATOR]:

I am writing to request your agency's participation in the **Local Jail Reporting Program (LJRP) Pilot Study**, sponsored by the Bureau of Justice Statistics (BJS). BJS is piloting the LJRP, a collection of individual-level administrative data (e.g., booking records), with some of the largest jails in the country.

As part of the pilot study, we would like to interview you or member(s) of your jail team familiar with your jail management system and data sharing process. The interview will take about one hour and cover the following topics:
- How your agency tracks the movements of inmates
- What data elements are available in your jail management system (including inmate characteristics and status, admission and release timestamps and reasons, charges and sentences, bail and bond, and case disposition)
- What administrative process your agency has in place for data sharing
- What challenges you anticipate in sharing data with BJS.

The results of the interviews will be used to inform the design of the LJRP only and will not be published or released outside BJS. By law, BJS employees and its data collection agents may only use your agency's information for statistical or research purposes and must protect the confidentiality of information identifiable to a private person (34 U.S.C. § 10231). BJS is not permitted to publicly release your agency's responses in a way that could reasonably identify a specific person.

The University of Michigan is BJS's data collection agent for this effort. Please let the team know by email (um-bjs-ljrp@umich.edu) whether you will be able to participate and, if so, the appropriate contact information. Our data collection team will follow up to schedule the appointment. Participation in the study is voluntary.

If you have any comments or questions about the LJRP, please feel free to contact Zhen Zeng, BJS LJRP Project Manager, at Zhen.Zeng@usdoj.gov or (202)-598-9955.

BJS appreciates your generous cooperation and partnership in supporting this important effort.

Sincerely,

Dr. Alexis R. Piquero
Director

U.S. Department of Justice

Office of Justice Programs

Bureau of Justice Statistics

_____

Washington, DC 20531

Dear <<Insert Name of Jail Administrator>>,

Recently, the Bureau of Justice Statistics (BJS) sent you an email inviting you to participate in the **Local Jail Reporting Program (LJRP) Pilot Study**. I am following up today on that request.

BJS is piloting the LJRP, a collection of individual-level administrative data (e.g., booking records), with some of the largest jails in the country. As part the pilot study, we would like to interview you or member(s) of your office to learn about your jail management system and data sharing process. The phone interview will take about one hour. Data collected for the pilot study will be kept confidential and will not be published or released outside BJS.

The University of Michigan is BJS's data collection agent for this effort. Please let the team know by email (um-bjs-ljrp@umich.edu) whether you will be able to participate and, if so, the appropriate contact information. Our data collection team will follow up to schedule the appointment.

Answers to frequently asked questions are attached to this email. If you have any comments or questions about the LJRP, please contact me at Zhen.Zeng@usdoj.gov or (202) 598-9955.

BJS appreciates your generous cooperation and partnership in supporting this important effort.

Sincerely,

Zhen Zeng
LJRP Project Manager

Local Jail Reporting Program Pilot Study

Frequently Asked Questions

What is the Bureau of Justice Statistics (BJS)?

A component of the Office of Justice Programs within the U.S. Department of Justice, BJS is the United States' primary source for criminal justice statistics. The mission of BJS is to collect, analyze, publish, and disseminate information on crime, criminal offenders, victims of crime, and the operation of justice systems at all levels of government. BJS also provides financial and technical support to state, local, and tribal governments to improve both their statistical capabilities and the quality and utility of their criminal history records.

What is the Local Jail Reporting Program (LJRP)?

BJS hopes to develop the Local Jail Reporting Program, a national data collection of individual-level jail administrative data, in the coming years. The LJRP will draw on booking records from jail management systems. It will supplement other BJS jail collections and provide a main source for individual-level data on jail populations; admissions and releases; and charges and sentences.

What is the University of Michigan's role in the LJRP Pilot Study?

BJS has contracted the University of Michigan (UM) to act as the data collection agent for the LJRP Pilot Study. UM will be responsible for conducting interviews with jail representatives; and collecting and processing administrative record data. UM was selected for this project because of their expertise in collecting and processing secure criminal justice administrative data.

Is participation in the study voluntary?

Yes, participation in the study is voluntary. You may decline to answer any and all questions, or stop the interview, at any time. However, we ask for your participation in this study because your response is valuable for BJS to understand how jails keep records on inmates, what information is recorded, and the capability of jails to share this information, so that BJS can make an informed decision on how to proceed with a pilot collection of individual-level administrative data.

What questions will be asked during the interview?

During the phone or video interview, we will ask questions in the following areas:

1. Your jail's data management system, including system vendor, software product name, types of inmates tracked, and types of inmate movements tracked (e.g., movements into and out of jail and internal movements).

2. The availability of specific data elements in your system, including inmate demographic characteristics; information on charges, sentences, and bail; circumstances of admission and release; and unique personal identifiers such as Social Security Number (SSN), FBI number, and state ID number.

3. Your jail's capability and expected burden in sharing individual-level records with BJS, as well as technical, legal, and confidentiality issues involved in sharing your administrative records.

The interview will be conducted by an experienced interviewer from UM, BJS's data collection agent. The interviewer will take notes during the interview but will not record the conversation.

How does BJS keep data secure?

BJS is bound by federal law (Title 34 U.S.C. § 10231), which provides that "No officer or employee of the Federal Government, and no recipient of assistance under the provisions of this chapter shall use or reveal any research or statistical information furnished under this chapter by any person and identifiable to any specific private person for any purpose other than the purpose for which it was obtained in accordance with this chapter. Such information and copies thereof shall be immune from legal process, and shall not, without the consent of the person furnishing such information, be admitted as evidence or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceedings."

BJS has numerous confidentiality and security protections governing the data collected by BJS and its data collection agents. BJS and its data collection agents are required to follow the BJS Data Protection Guidelines, which summarizes the federal statutes, regulations, and data security procedures governing BJS and its data collection agents in more detail. These guidelines ensure the confidentiality of all data, including PII.

Local Jail Reporting Program Pilot Study Sample Call Script for Nonresponse Calls

Hello, this is <<INSERT NAME>> calling from the University of Michigan regarding the Local Jail Reporting Program Pilot Study. I am following up on an email that we sent to <<Jail Administrator Name>>. May I speak with <<Jail Administrator Name>> or <<Other Facility Contact>>?

[IF LEAVING MESSAGE ON VOICEMAIL OR WITH JAIL ADMINISTRATOR]
Hello, this is <<INSERT NAME>> calling from the University of Michigan. We recently sent you an email inviting you to participate in the Local Jail Reporting Program Pilot Study, sponsored by the Bureau of Justice Statistics. I am calling to follow up on that. As part of this study, we are hoping to interview you or someone in your office to understand your jail management system and data sharing process. I wanted to confirm that you received the request and to find out if you have identified a representative for the interview.

<<Insert for voicemail: Please give me a call back at [PHONE NUMBER] for details on the pilot study and the opportunity to provide feedback to the Bureau of Justice Statistics. Thank you and have a good day!>>

[IF CALL REACHES OR IS ROUTED TO FACILITY CONTACT OTHER THAN THE JAIL ADMINSTRATOR]
Hello, this is <<INSERT NAME>> calling from the University of Michigan. We recently sent <<Jail Administrator Name>> an email inviting you to participate in the Local Jail Reporting Program Pilot Study, sponsored by the Bureau of Justice Statistics. I am calling to follow up on that. As part of this study, we are hoping to interview <<Jail Administrator Name>> or someone in your office to understand your jail management system and data sharing process. I wanted to confirm that <<Jail Administrator Name>> received the request and to find out if <<he/she>> has identified a representative for the interview.

<<Insert for voicemail: Please give me a call back at [PHONE NUMBER] for details on the pilot study and the opportunity to provide feedback to the Bureau of Justice Statistics. Thank you and have a good day!>>

[ANSWER QUESTIONS ABOUT THE STUDY USING THE FAQ AS A GUIDE]

[IF FACILITY HAS NOT RECEIVED EMAIL]
Let me review the information we have on file for your facility.

[REVERIFY EMAIL ADDRESS AND OFFER TO RE-SEND THE INFORMATION]

[IF FACILITY IS WILLING TO PARTICIPATE IN THE INTERVIEW]
Great! Can you please let us know who will be the contact person for the interview? The contact person can be yourself or someone else who is familiar with your jail management data system

and data sharing process.

Thank you. We will follow up with the contact person by email to schedule the interview. We appreciate your participation!

[IF AGENCY REFUSES TO PARTICIPATE IN THE INTERVIEW]
Thank you for taking the time to speak with me and for considering this request.

Local Jail Reporting Program Pilot Study

Jail Management System Data Element Check List

Please indicate if the following data elements are included in your jail management system (JMS) and return the completed form to um-bjs-ljrp@umich.edu. If you have comments or clarifications, you can enter them at the end of the form. Thank you!

Category	Data Element	In your JMS?
Personal identifiers and characteristics	Last name	Yes☐ No☐
	First name	Yes☐ No☐
	Middle name or initial	Yes☐ No☐
	Date of birth	Yes☐ No☐
	Sex	Yes☐ No☐
	Race	Yes☐ No☐
	Hispanic origin	Yes☐ No☐
	Is a U.S. citizen	Yes☐ No☐
	State ID number (SID)	Yes☐ No☐
	Federal Bureau of Investigation (FBI) number	Yes☐ No☐
	Full Social Security Number (SSN)	Yes☐ No☐
Arrest/booking	Name of the arresting agency	Yes☐ No☐
	Arresting agency ORI	Yes☐ No☐
	Date of arrest	Yes☐ No☐
	Charge codes at arrest	Yes☐ No☐
	Charge descriptions at arrest	Yes☐ No☐
	Charge levels at arrest	Yes☐ No☐
	Individual's jail/booking number	Yes☐ No☐
Admission, release, and movements in jail	Date and time of admission	Yes☐ No☐
	Admission reason	Yes☐ No☐
	Date and time of release	Yes☐ No☐
	Release reason	Yes☐ No☐
	Date and time of movements while under jail jurisdiction	Yes☐ No☐
	Movement reason	Yes☐ No☐
Hold/Detainer	Is there a detainer/hold/warrant	Yes☐ No☐
	Name of agency with detainer/hold/warrant	Yes☐ No☐

Category	Data Element	In your JMS?	
Conviction and sentencing status	Is the inmate detained pretrial	Yes☐	No☐
	Is the inmate serving a jail sentence (usually one year or less)	Yes☐	No☐
	Is the inmate serving a prison sentence in jail (usually longer than one year)	Yes☐	No☐
Initial charges *Criminal statute(s) for which a defendant appears in court. These are the charges the prosecutor is formally charging a defendant with.*	Name of initial court	Yes☐	No☐
	Initial court case/docket number	Yes☐	No☐
	Initial charge codes	Yes☐	No☐
	Initial charge descriptions	Yes☐	No☐
	Initial charge levels	Yes☐	No☐
	Arraignment date	Yes☐	No☐
Bail/bond	Is bail/bond ordered	Yes☐	No☐
	Is bail/bond posted	Yes☐	No☐
	Bail/bond type	Yes☐	No☐
	Bail/bond amount	Yes☐	No☐
	Is inmate released on bond	Yes☐	No☐
	Date of release after posting bail/bond	Yes☐	No☐
Final charges *Criminal statute(s) for which a defendant is found guilty or enters a guilty plea. These are the charges the defendant will be sentenced for.*	Name of final court	Yes☐	No☐
	Final charge codes	Yes☐	No☐
	Final charge descriptions	Yes☐	No☐
	Final charge levels	Yes☐	No☐
	Date of disposition	Yes☐	No☐
	Disposition	Yes☐	No☐
Sentences	Date of sentencing	Yes☐	No☐
	Type of sentence (e.g., probation, incarceration, fines, restitution)	Yes☐	No☐
	Length of sentence	Yes☐	No☐
Comments			

Reset   Print   Save

Local Jail Reporting Program Pilot Study
Interview Guide

Jail name and location:

Sheriff / Jail Administrator / Department Head:

Interviewer (1):

Interviewer (2):

Interviewee name and title (1):

Interviewee name and title (2):

Interviewee name and title (3):

Date:

Introduction and purpose of the interview

The Bureau of Justice Statistics (BJS), a federal statistical agency housed in the U.S. Department of Justice (DOJ), is seeking your agency's participation in a pilot study to help inform the planning for a new BJS program, the Local Jail Reporting Program (LJRP). The goal of LJRP is to collect individual-level administrative data from local jails to support research and public policy decisions.

BJS awarded funds to the University of Michigan (UM) to operate as BJS's agent for the LJRP pilot data collection. As a first step, we are conducting interviews with 30 of the largest jails to understand if and how they can provide individual-level data to BJS for statistical and research purposes. The findings of the interviews will be used to develop the LJRP collection and will not be released to the public.

We have a series of questions about the Jail Management System (JMS) your agency uses and about your agency's capacity to provide data from that JMS to BJS. This interview will take approximately 60 minutes to complete. Your agency's participation in this interview is completely voluntary. You may decline to answer specific questions, limit your responses, or

may stop the interview at any time. Your agency will not be penalized in any way if you choose to not participate in the interview or the data collection stage of the pilot study.

We appreciate you taking the time to talk to us today! Your input will be critical to help BJS improve its jail data collection.

General questions about the Jail Management System (JMS)

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1. Vendor:

2. Product Name:

3. How many years has your agency been using this JMS?

4. How many years of individual-level data are stored in your JMS?

5. Are you planning to switch to a different JMS in the next year or two? If yes, what is the name of the new system (if known)?

6. Does your JMS import data from other systems, e.g., Case Management System from the Court, Offender Management Systems from the DOC?

   Yes☐   No☐

   a. If yes, from what other system(s)?

   b. If yes, what type of data are imported?

      i.   Demographic characteristics   Yes☐   No☐

      ii. Arrest information   Yes☐   No☐

      iii. Case/charge information   Yes☐   No☐

      iv. Bail/bond information   Yes☐   No☐

      v.   Sentences   Yes☐   No☐

Data sharing with BJS

[*Interviewer talking points:* BJS is required by law to use the data it collects only for statistical or research purposes and protect respondent privacy and confidentiality. To fulfill these statutory obligations, BJS and its data collection agents employ robust physical, technical, and administrative controls and data security procedures to protect the data collected under BJS's authority.

BJS is governed by many federal laws, regulations, and policies to uphold these fundamental requirements and responsibilities, which are summarized in the BJS Data Protection Guidelines, available on the BJS website at - https://bjs.ojp.gov/sites/g/files/xyckuh236/files/media/document/bjs_data_protection_guidelines.pdf .]

We would like to learn more about how your JMS tracks the movement of inmates, and their charges and sentences, but before we start on that, I have some questions about your data sharing process…

7. If BJS were to request individual-level data from your jail for statistical purposes, can your agency provide the following types of data to BJS?
    a. Data that contains no personal identifiers (e.g., race, charges, data of admissions)?

    Yes☐   No☐
    b. Data that contains personal or unique identifiers (e.g., full name, exact DOB, SSN, FBI #)?

    Yes☐   No☐
    c. Are there any specific data elements or categories of data, such as inmate characteristics, arrest and booking, charges, bail/bond, or sentences, that your agency cannot share with BJS, either due to legal, data quality, or other reasons?

8. What administrative processes does your jail have in place for sharing data with a federal agency like BJS? Who has to approve data sharing?

9. Do you have any preferred process or requirements for BJS to follow to request the data?

10. In your experience, about how long does it typically take to review and make determinations about data provision requests?

11. Are there any major challenges you can anticipate to providing individual-level data to BJS? [Interviewer: Probe with "Are there any other challenges?"]

12. What could BJS do to help make it easier to provide any or all of the requested data?

13. When we are ready to request pilot data for the LJRP, to whom or to what entity should we address the request?
    a. Name:
    b. Title:
    c. Phone:
    d. Email:

Inmate movements and status changes

14. Are the following types of jail entry captured as new admissions in your JMS? [Interviewer: Record explanations for Not Applicable items.]
    a. Transfers from another facility within your jail jurisdiction   Yes☐   No☐   NA☐
    b. Repeat offenders booked on new charges   Yes☐   No☐   NA☐
    c. Returns from court appearance   Yes☐   No☐   NA☐
    d. Returns from bail/bond releases   Yes☐   No☐   NA☐
    e. Returns from work release   Yes☐   No☐   NA☐
    f. Returns from medical appointments or treatment facilities   Yes☐   No☐   NA☐
    g. Returns from furloughs   Yes☐   No☐   NA☐

15. What admission reasons are recorded in your JMS?

16. Can you distinguish admissions booked on new charges from transfers from other facilities within your jail jurisdiction and returns from temporary release? If so, how (e.g., through booking ID, inmate ID, or admission reason)?

17. Can you create individual-level data extracts containing all admissions within a specified date range?

18. An inmate's status often changes while in jail, e.g., pretrial to sentenced, pretrial to bond release, and temporary release to pretrial (bond violation).
    a. What types of status are captured in your JMS?
    b. How are status changes recorded in the JMS? Are existing data overwritten or new records created when recording status changes?
    c. Are the date and time of status changes recorded in the JMS? Yes☐   No☐

19. Are the following types of exits from jail captured as releases in your JMS? [Interviewer: Record explanations for Not Applicable items.]
    a. Transfers to another facility within your jail jurisdiction   Yes☐ No☐ NA☐
    b. Temporary releases for a court appearance   Yes☐ No☐ NA☐
    c. Pre-trial releases (e.g., posted bail/bond)   Yes☐ No☐ NA☐
    d. Work releases   Yes☐ No☐ NA☐
    e. Temporary releases for medical appointments/treatment   Yes☐ No☐ NA☐
    f. Furloughs   Yes☐ No☐ NA☐

20. What release reasons are recorded in your JMS?

21. Can your JMS create individual-level data extracts containing all releases within a specified date range?

Charges and Sentences

22. How are charge data entered into your JMS? Are they entered manually or imported from another agency through data linkage? What about sentence data?

23. If charges are modified, such as amended or reduced, how is that recorded in your JMS?

24. Are charges categorized by type, such as violent, property, drug, and public disorder in your JMS? If so, what are the categories?

25. Are charges categorized by level of severity, such as felony and misdemeanor? If so, what are the categories?

26. Do you have charge data on inmates held for state DOC or federal authorities such as U.S. Marshals and ICE?

27. Can you create individual-level data extracts containing all charges associated with each admission within a specified date range?

28. How are sentence data entered into your JMS? Are they entered manually or imported from another agency through data linkage?

29. Do you have sentence data on inmates held for state DOC or federal authorities such as U.S. Marshals and ICE?

30. Can you create individual-level data extracts containing lengths of sentences for each inmate serving time in your jail within a specified date range?

Conclusion

That is all the questions we have today. Thank you so much for sharing your knowledge about your JMS and data sharing process with us.

Attachment F: Pilot data request email

Dear [NAME],

Thank you again for participating in the interview for the Local Jail Reporting Program (LJRP) Pilot Study. As we move to the phase 2 of the study, we are reaching out to you today to request individual-level administrative record data from your jail.

The data you provide will be used to inform the design of the LJRP only and will not be published or released outside BJS. By law, BJS employees and its data collection agents may only use your agency's information for statistical or research purposes and must protect the confidentiality of information identifiable to a private person (34 U.S.C. § 10231). BJS is not permitted to publicly release your agency's data in a way that could reasonably identify a specific person.

We have attached a Data Extraction Guide to this email. Please respond to this email or call me to discuss your participation in this pilot data collection by [Date], and please do not hesitate to contact me with any questions or concerns.

If you have any comments or questions about the LJRP, please feel free to contact me or Zhen Zeng, BJS LJRP Project Manager, at Zhen.Zeng@usdoj.gov or (202)-598-9955. BJS appreciates your generous cooperation and partnership in supporting this important effort.

Sincerely,
Diana Sutton
Criminal Justice Administrative Records System
University of Michigan
(248) 881-4133

Local Jails Reporting Program Pilot Study Electronic Data Extract Guide

Prepared by

University of Michigan
and
Bureau of Justice Statistics

OMB Control Number: ##### Expiration Date: #####

Table of Contents

1. Local Jails Reporting Program Pilot Study Overview

The goal of the Bureau of Justice Statistics' (BJS) Local Jails Reporting Program (LJRP) Pilot Study is to support the planning of the LJRP, a new data collection of person-level jail administrative records designed to better understand the flows of individuals into and out of local jails, the characteristics of people incarcerated in jails, and the reasons for incarceration.

This pilot study will be completed in two phases by the University of Michigan. During the first phase, University of Michigan conducted interviews with 30 of the largest local jails in the U.S. to learn about their jail management systems and data sharing procedures. The second phase involves collecting pilot data from 10 of the jails that participated in phase one. The pilot data will be used to plan for the implementation of LJRP on a large scale and will not be published or released outside BJS.

2. Data Preparation Instructions

This is an individual- and case-level data collection. We are interested in person-level information on individuals booked into local jails, including arrests that led to bookings, admissions, releases, and movements while held in jail, detainer information, conviction and sentencing status while held in jail, charges, bail, and sentencing outcomes. **Appendix A** lists the data elements that we would like to collect for this study. We do not expect agencies to have all requested data elements. Please provide those data elements that are available in your system.

If you have questions about our data request, or it would be too burdensome or technically challenging to provide the data elements, please send us an email at um-bjs-ljrp@umich.edu. We recognize that systems vary in terms of the ability to store, extract, and share data, and are prepared to assist you.

2.1 Identifying Eligible Records

Please include records of—
- all individuals held in your jail on 06/30/2021, and
- all admissions that occurred between 07/01/2021 and 06/30/2022.

For eligible records, please include available data elements listed in **Appendix A**.

2.2 File Structure

You may provide data in any format that is suited to your system or convenient for you. However, we recommend organizing the requested data in a series of

relational tables linked by personal identifiers and jail booking numbers as follows:

- Table 1: Person-level data and personal identifiers, such as name, date of birth, sex, race, state ID, FBI number, and Social Security Number.
- Table 2: Admission and release records, such as admission date, release date, admission reason, release reason, detainer status, pretrial status, bail, movement reason, movement date, etc. Each row can represent an admission event, a release event, or a pair of matched admission and release events.
- Table 3: Arrest, charge, and sentence records, such as arresting agency, arrest date, charge code, charge description, court name, sentence date, and sentence length. Each row represents a charge at arrest, an initial charge an inmate appears in court for, or a final charge an inmate is found guilty or enters a guilty plea for.

2.3 File Format

There is no required format for the data you submit; use any format that is most convenient for you. All file formats will be accepted. Some common file formats include:

- Text files (fixed width, delimited)
- Excel or .csv files
- Data analysis software files (e.g., SAS, STATA, SPSS, or R data files)

You do not need to recode or format your data prior to submission.

2.4 Supporting Documentation

If possible, we ask that you provide supporting documentation with your submission. Specifically, we request:

- Data point of contact (POC) (i.e., name, organization, address, telephone, and email address)
- Date that the data extract is pulled
- Parameters of data query (e.g., all individuals booked into jail between 07/01/21 through 06/30/2022)
- Known data limitations or quality issues
  - Missing data
    - System missing (requested data element is not available in the system)
    - Missing items (requested data element is available, but blank for a significant number of records)
    - Missing records (complete records of some eligible cases are missing)

- - ○ Other common data issues include
        - ■ Misspellings
        - ■ Redundancy or duplication (e.g., two or more records for the same case)
  - ● Data formatting information
    - ○ Data dictionaries, including variable/column names, variable description, expected variable values
    - ○ Known discrepancies in the data fields as described in **Appendix A** and in your system (e.g., Hispanic origin is a race category in your system but a field separate from race in Appendix A)

During the data standardization process, we may contact you with questions to ensure that all submitted data are processed correctly. Any documentation available that defines data fields or entries within data fields may help to clarify questions at the outset if submitted with the data extract.

3. Data Submission Instructions

Data will be transferred to BJS and University of Michigan via the Justice Enterprise Files Sharing (JEFS) system. This system uses Box Incorporated Software as a Service (SaaS) capability as a transport infrastructure. This will provide a method of secure data transfer. When you are ready to submit data, we will create a login for you and provide instructions on how to complete the secure file transfer.

If your agency prefers to transfer data in some other way, we will also accept the submission. Common data transfer methods include:
- ● Secure File Transfer Protocol (SFTP)
- ● Encrypted CD sent through the mail
- ● Email with encrypted data file(s)

After transfer of data via JEFS or another method, all data will be securely managed and stored by the University of Michigan on a secure server while the data are being processed. Data will be stored in a computing environment designed for criminal justice data storage and management which requires a high level of security. The University of Michigan Institute for Social Research (ISR) hosts the secure data server. Within ISR, the Survey Research Center's (SRC) Computing and Multimedia Technologies (CMT) staff manage the data server. This system was built to meet all applicable FBI Criminal Justice Information System (CJIS) standards.

3.1 Will the data be secure and kept confidential?

Consistent with its statutory obligations (34 U.S.C. § 10134), BJS only uses information collected under its authority for statistical or research purposes.

Further, BJS is required by law to protect the confidentiality of all personally identifiable information (PII) it collects or acquires in conjunction with BJS-funded projects (34 U.S.C. § 10231), and must maintain the appropriate administrative, physical, and technical safeguards to protect the identifiable information against improper use or unauthorized disclosure. BJS will not use or reveal data identifiable to a private person, except as authorized under 28 CFR § 22.21 and § 22.22. The BJS Data Protection Guidelines summarize the federal laws, regulations, and other authorities that govern information acquired under BJS's authority, and are published on the BJS website: https://www.bjs.gov/content/pub/pdf/BJS_Data_Protection_Guidelines.pdf.

As BJS's data collection agent for the LJRP Pilot Study, University of Michigan is required to adhere to the same requirements to protect data security and confidentiality. We have also developed a data management plan specifically for this project, which describes how the LJRP pilot data will be collected, handled, processed, stored, and disposed of at the end of the project. The data management plan will be provided to you upon request.

3.2 When is the submission due?

We ask that all participating agencies provide their data by ##/##/####. Please reach out to us if you need additional time to submit your data.

3.3 What happens after we submit the data?

We will import the data into a standard structure, format and recode the data fields, and conduct a series of checks to ensure that the data are processed correctly. We may reach out to you with questions about variable values, data labels, or missing data to understand your data.

4. Whom do I contact if I have questions?

Please reach us at um-bjs-ljrp@umich.edu for questions or support in submitting your data.

Appendix A: Requested Data Elements and Case Selection

The following tables list the data elements we are requesting for the LJRP Pilot Study. The name and description of the data field provided should help you locate a similar data element in your jail management system.

- We do not expect agencies to have all of the listed data elements. Please provide corresponding data fields available in your system.
- You do not need to recode or format your data fields. Please provide the data in any format that is convenient for you.
- If the data are encoded into numerical values in your system, please provide value labels in the documentation (e.g., 1 = white, 2 = black, 3 = native American, etc.).
- Please provide the month, day, and year for all dates (e.g., date of birth and date of arrest). You can provide dates in any format, as one field or multiple fields.
- If possible, please provide a data user manual or data dictionary.

Part 1. Personal Identifiers and Characteristics

Please include records of—
- all individuals held in your jail on 06/30/2021, and
- all individuals admitted between 07/01/2021 and 06/30/2022.

Data element	Definition
Last name	Last name of the inmate.
First name	First name of the inmate.
Middle name/initial	Middle name/Initial of the inmate.
Date of birth	Date of birth (month, day, and year) of the inmate
Sex	Biological sex or sex assigned at birth.
Race	Race of the inmate.
Hispanic origin (as a field separate from race)	Does the inmate identify as Hispanic?
U.S. citizen	Is the inmate a U.S. citizen?
State ID number (SID)	State identification number.
FBI number	Federal Bureau of Investigation number.

Social Security Number	Full (9-digit) social security number.
Personal ID number	Other personal identification number used in your JMS

Part 2. Admissions, Releases, and Movements in Jail

- Please include the admission and release records of all individuals held in your jail on 06/30/2021 and all individuals admitted between 07/01/2021 and 06/30/2022.
- For each admission or release event, please include jail booking number and available personal identifier(s) such as state ID, name, and date of birth of the inmate for data linkage.
- If an individual was admitted into or released from your jail multiple times between 07/01/2021 and 06/30/2022, please include records for all admissions and releases.

Data element	Definition
Jail booking number	The unique identification number assigned to the booking event
Date of admission	Date of jail admission (month, day, and year)
Time of admission	Time of jail admission
Admission reason	Reason for jail admission
Date of release	Date of release from jail (month, day, and year)
Time of release	Time of release from jail
Release reason	Reason for release from jail
Date of movement	Date of movement while under jail jurisdiction (month, day, and year)
Time of movement	Time of movement while under jail jurisdiction
Movement reason	Reason for movement while under jail jurisdiction (e.g., move to a different facility, furlough, out to court, out for medical treatment, etc.)
Detainer/hold/warrant	Does the inmate have a detainer/hold/warrant on their record?
Name of agency with	If yes, what is the agency name with the

detainer/hold/warrant	detainer/hold/warrant
Pretrial detention	Is the inmate waiting for trial?
Serving jail sentence	Is the inmate serving a sentence of incarceration for less than one year, commonly known as a jail sentence?
Serving prison sentence	Is the inmate serving a sentence of incarceration for more than one year, commonly known as a prison sentence?
Bail ordered	Has bail been ordered by the court?
Bail type	What type of bail was ordered by the court (cash, surety, %, ROR, etc.)?
Bail amount	What amount of bail was ordered?
Bail posted	Has bail been posted for the inmate?
Bail release	Has the individual been released based on his/her bail being posted?
Bail release date	Date the individual was released based on his/her bail being posted (month, day, and year)

Part 3. Arrests, Charges, and Sentences

- Please include arrest, charge, and sentence records of all individuals held in your jail on 06/30/2021 and all individuals admitted between 07/01/2021 and 06/30/2022.
- Please include all arrests for individuals with multiple arrests and all charges for persons with multiple charges.
- Please include jail booking number and available personal identifier(s) such as state ID, name, and date of birth of the inmate for data linkage.

Data element	Definition
Arresting agency name	Name of the arresting agency
Arresting agency ORI	ORI of the arresting agency
Arrest ID number	The unique identification number assigned to the arrest

Date of arrest	Date of arrest (month, day, and year)
Arrest charge code	Charge code (statute number) at arrest
Arrest charge description	Description of charge at arrest (e.g., robbery armed, resist/obstruct/flee)
Charge level at arrest	Severity level of charge at arrest (e.g., felony, misdemeanor, ordinance, etc.)
Initial court name	Name of the court where the inmate first appeared for arraignment/bail decision
Initial court case number	Court case number associated with the initial charge
Initial charge code	Initial charge code (statute number) the inmate appeared in court for
Initial charge description	Description of the initial charge (e.g., robbery armed, resist/obstruct/flee)
Initial charge level	Severity level of the initial charge (e.g., felony, misdemeanor, traffic, ordinance)
Arraignment date	Date the inmate was arraigned on initial charge(s) (month, day, and year)
Final court name	Name of the court where the inmate appeared for disposition (guilty plea, jury trial, bench trial, etc.)
Final court case number	Court case number associated with the final charge
Final charge code	Final charge code (statute number) the inmate was found guilty or entered a guilty plea for
Final charge description	Description of the final charge (e.g., robbery armed, resist/obstruct/flee)
Final charge level	Severity level of the final charge (e.g., felony, misdemeanor, traffic, ordinance)
Disposition type	Type of disposition for the final charge (pled guilty, found guilty, acquitted, dismissed, Nolo Contendere, mistrial, Nolle Prosequi, etc.)
Disposition date	Date the final charge was disposed of (month, day, and year)

Sentence date	Date sentence was imposed for the final charge (month, day, and year)
Sentence type	Type of sentence imposed for the final charge
Sentence length	Length of sentence imposed for the final charge

Attachment H: IRB approval

4/8/22, 12:00 PM   University of Michigan Mail - eResearch Notice: Amendment (Ame00122344) for (HUM00201251) has been approved by the IRB.

UNIVERSITY OF MICHIGAN   **Jordan Papp <pappj@umich.edu>**

eResearch Notice: Amendment (Ame00122344) for (HUM00201251) has been approved by the IRB.
1 message

eresearch@umich.edu <eresearch@umich.edu>   Fri, Apr 8, 2022 at 11:24 AM
Reply-To: eresearch@umich.edu
To: pappj@umich.edu, mgms@umich.edu, suttondi@umich.edu

UNIVERSITY OF MICHIGAN eResearch.umich.edu

Health Sciences and Behavioral Sciences Institutional Review Board (IRB-HSBS) • 2800 Plymouth Rd., Building 520, Room 1170, Ann Arbor, MI 48109-2800 • phone (734) 936-0933 • fax (734) 998-9171 • irbhsbs@umich.edu

To: Michael Mueller-Smith

From:

Riann   Palmieri-Smith
Thad   Polk

Cc:

Jordan   Papp
Michael   Mueller-Smith
Diana   Sutton

Subject: Amendment [Ame00122344] Approved for [HUM00201251]

SUBMISSION INFORMATION:
Study Title: Implementing the Local Jail Reporting Program (LJRP) Pilot
Full Study Title (if applicable):
Study eResearch ID: HUM00201251
Amendment eResearch ID: Ame00122344
Amendment Title: HUM00201251_Amendment - Tue Mar 29 07:31:17 EDT 2022
Date of this Notification from IRB: 4/8/2022
Date of Approval for this Amendment: 4/8/2022
Review: Expedited
Current IRB Approval Period: -
Expiration Date: Approval for this expires at **11:59 p.m. on**
UM Federalwide Assurance (FWA): FWA00004969 (For the current FWA expiration date, please visit the UM HRPP Webpage)

OHRP IRB Registration Number(s): IRB00000245

Approved Risk Level(s) as of this Amendment:

Name   Risk Level
HUM00201251   No more than minimal risk

Continuing Review Required: Yes

NOTICE OF IRB APPROVAL AND CONDITIONS:
The IRB HSBS has reviewed and approved the amendment to the study referenced above. The IRB determined that the proposed research continues to conform with applicable guidelines, State and federal regulations, and the University of Michigan's Federalwide Assurance (FWA) with DOJ regulations for human subjects protections in 28 CFR 46.111 and UM policy. You must conduct this study in accordance with the description and information provided in the approved application and associated documents, as amended.

APPROVAL PERIOD AND EXPIRATION:
The approval period for this study is listed above. Please note the expiration date is not changed by the approval of this amendment. If the approval lapses, you may not conduct work on this study until appropriate approval has been re-established, except as necessary to eliminate apparent immediate hazards to research subjects. Should the latter occur, you must notify the IRB Office as soon as possible.

RENEWAL/TERMINATION:
The IRB has determined that annual review and renewal is required for this research. At least two months prior to the expiration date indicated above, you should submit a continuing review application either to renew or terminate the study. Failure to allow sufficient time for IRB review may result in a lapse of approval that may also affect any funding associated with the study.

IMPORTANT REMINDERS AND ADDITIONAL INFORMATION FOR INVESTIGATORS

APPROVED STUDY DOCUMENTS:
You must use any date-stamped versions of recruitment materials and informed consent documents available in the eResearch workspace (referenced above). Date-stamped materials are available in the "Currently Approved Documents" section on the "Documents" tab.

FUTURE AMENDMENTS:
All proposed changes to the study (e.g., personnel, procedures, or documents), must be approved in advance by the IRB through the amendment process, except as necessary to eliminate apparent immediate hazards to research subjects. Should the latter occur, you must notify the IRB Office as soon as possible.

AEs/ORIOs:
You must inform the IRB of adverse events (AEs) and other reportable information and occurrences (ORIOs) according to your IRB's required reporting timetable (IRBMED and IRB-HSBS/Flint/Dearborn).

UNANTICIPATED PROBLEMS INVOLVING RISKS TO SUBJECTS OR OTHERS (UPIRSOs or UaPs) :
Investigators must inform the IRB promptly of any potential Unanticipated Problems (UaPs or UPIRSOs) that come to the attention of the study team. Unanticipated Problems meet **all of the following criteria:**

1. **Unexpected** (in terms of nature, severity, frequency);
2. **Related or possibly related to participation in the research;** and
3. Suggests that the research places subjects or others at **a greater risk of harm** than was previously known or recognized.
See U-M HRPP Operations Manual Part 12.III.B.1.a.

SUBMITTING VIA eRESEARCH:
You can access the online forms for continuing review, amendments, and AEs/ORIOs in the eResearch

workspace for this approved study, referenced above.

MORE INFORMATION:
You can find additional information about UM's Human Research Protection Program (HRPP) in the
Operations Manual and other documents available at: http://research-compliance.umich.edu/human-subjects.

Riann Palmieri-Smith Thad Polk
Co-chair, IRB HSBS   Co-chair, IRB HSBS

eRESEARCH | REGULATORY MANAGEMENT

Path >>   My Home   **Human Subjects Studies**   Biosafety / IBC   Repositories   Help

Current State

Approved

Edit / View

View Study

Printer Friendly Version

Create New

Adverse Event / ORIO

Amendment

Continuing Review

Termination Report

Activities

Edit Study Team Members

Post Correspondence

Update NCT Number

Implementing the Local Jail Reporting Program (LJRP) Pilot **(HUM00201251)**

▼ **Study Team**

Study Team Member	Study Team Role	Appointment Dept	Appt Selection Complete	Student	Friend Account	Accepted Role?	COI Review Required	Edit Rights
Michael Mueller-Smith	PI	Population Studies Center	Yes	no	No	N/A	no	yes
Jordan Papp	Study Coordinator/Project Manager	Population Studies Center	Yes	no	No	Yes	no	yes
Diana Sutton	Study Coordinator/Project Manager	Population Studies Center	Yes	no	No	Yes	no	yes

Main   Notes   Documents   Related Projects   Amendments   Continuing Reviews   AE/ORIO

(1) Pre-Submission   (2) IRB Review   **(3) Approved**

Submission in **Approved** state

MIAP Staff Owner:

Current Approval Period:	- 4/7/2023
Current Expiration Date:	4/7/2023
Last Continuing Review (SCR) Approval Date:	
Study Status:	
Accrual Closed:	
Last Amendment Approval Date:	4/8/2022
Original Study Approval Date:	
Staff Owner:	Mary Donnelly
MCRU ID:	
Cancer PRC ID:	
NCT Number:	

Currently Approved Risk Level(s):

Name	Level Of Risk
HUM00201251	No more than minimal risk

Currently Approved Maximum Subject Payment Tier: 0   Tier Information

View of Approved HUM Application:

Originally Approved HUM Application (HTML view): [View]

Activities and Correspondence

Activity	Author	▼ Activity Date
Approve and Change to Approved	Donnelly, Mary	4/8/2022 11:24 AM
Amendment Completed	Donnelly, Mary	4/8/2022 11:24 AM
Posted Correspondence	Donnelly, Mary	4/6/2022 5:04 PM
Hi Jordan - Just to update you, the amendment is with the reviewer. Mary		
Posted Correspondence	Papp, Jordan	4/4/2022 11:17 AM
I apologize, I am not sure what happened. I think it should be submitted now. Can you confirm please?		
Posted Correspondence	Donnelly, Mary	4/4/2022 10:37 AM
Hi Jordan - The amendment hasn't been submitted yet. Thanks, Mary		
Posted Correspondence	Papp, Jordan	4/4/2022 8:11 AM
Hi Mary, I was just checking back to see how things are going with the amendment. I would like to follow up with an anticipated timeline of review s contact at the Bureau of Justice Statistics is aware of how things are progressing. So i… **read more**		
Amendment Opened	Papp, Jordan	3/29/2022 7:32 AM
Posted Correspondence	Donnelly, Mary	3/28/2022 2:43 PM
Hi Jordan - The reviewer and I have been looking over the applicable regulations and can't seem to find a way to make a not-regulated de When we reviewed this and gave it an initial determination of not-regulated, it was because the work … **read more**		
Posted Correspondence	Papp, Jordan	3/25/2022 5:14 PM
That sounds like a good plan, Mary. Thank you for your work on this! I will wait to hear back from you before I follow up with BJS.		
Posted Correspondence	Donnelly, Mary	3/25/2022 5:06 PM
Hi Jordan - First of all, my mistake on the letter - I should have removed the reference to 45 CFR 46 (rookie mistake) but it just didn't register with this regulated determination. I've redone the letter and attached it here - hopefully tha… **read more** 📄 Mueller-Smith Not-Regulated DOJ ref.pdf		

40 items   ◀ page [1] of 4 ▶