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Bruce A. Monfross, Inspector General (A)
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Dear Inspector Monfross:

This letter is in response to the May 25, 2011 version of the OIG report, "California Department of Corrections and Rehabilitation's Implementation of the Non-Revocable Parole Program," which I have recently reviewed.

I am deeply disappointed that this revised version of the report contains many of the same inaccuracies and poorly crafted science as did the earlier version, even though I brought these errors to the attention of your office. This letter focuses on the inaccuracies and misleading conclusions related to the first three findings from the May 25, 2011 version of the report: 1) the automated CSRA instrument inaccurately assesses a number of offenders; 2) the automated CSRA instrument uses incomplete conviction data; and 3) the automated CSRA instrument inconsistently applies juvenile data when calculating risk assessment scores.

Accuracy

The analysis conducted by OIG investigators on the accuracy of the CSRA was flawed in two major respects.

First, investigators essentially compared "apples" to "oranges" in their exercise when they compared their own manual scoring of hard copy rap sheets with the automated CDCR computer algorithm used for the vast majority of offenders under the supervision of CDCR. The discrepancies identified by OIG were largely caused by OIG staff using "old" scores generated by an out-of-date scoring algorithm to compare with their hand scored calculations.

Second, and perhaps more disturbing, the OIG manual coding considered factors that are not programmed into the current automated version of the tool. Based on these "extra" factors, OIG claims that its coding is not only different from, but also more accurate than, the CDCR tool. While OIG's

manual coding is different from CDCR's automated coding (because OIG's coding includes additional factors), there is no evidence that OIG's manual coding is more accurate than CDCR's automated coding. The additional factors that OIG inserted into its own manual coding have never been tested to verify their accuracy – either by the OIG or by CDCR. The conclusion in the report – that OIG's manual coding is more accurate than CDCR's automated coding -- is nonsensical because it amounts to claiming accuracy for a procedure which was never tested for accuracy.

Conviction Data

OIG's second finding -- that criminal history records typically are incomplete -- is a limitation of which researchers and criminal justice professionals are well aware of. However, "rap sheets" are the standard used by the justice system and there currently exists no alternative, as the report itself notes.

Juvenile Data

OIG's third finding – that juvenile data are handled inconsistently –relates only to the miniscule number of juvenile records (much less than 1 percent) that are contained in the records. I have discussed this issue repeatedly with investigators from OIG. I have explained that the tool counts adult convictions on adult charges in adult courts. If a juvenile has an adult conviction on an adult charge, it is counted. Otherwise, it is not counted. This is a simple and concise rule that is consistent with Penal Code 3000.03. Therefore, OIG's report is incorrect.

Finally, as with any risk tool – whether used in the field of corrections, insurance or health - the CDCR continues to refine and test the tool in an effort to increase its accuracy and improve its use in making the most appropriate decisions regarding offender supervision and treatment. We agree that this tool, like any tool, can be improved. An evidence-based dialogue that accurately reflects the tool and possible ways it, and its use, might be improved, could benefit the CDCR, our State and our citizens. However, poor methods, suppositions and bad logic masquerading as evidence that this tool is flawed helps no one and only wastes scarce resources.

Sincerely,



Susan Turner, Ph.D.
Director

ST/jlm