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Re: OMB Number 1121-0102

Dear Ms. Carson,

The Office of Justice Programs requested comment on the extension and minor revision of the Summary of Sentenced Population Movement—National Prisoner Statistics. Among other questions, this information collection includes questions about the race and ethnicity of people under the jurisdiction of state prison systems.

In this comment I wanted to offer a suggestion that would “[e]nhance the quality, utility and clarity of the information to be collected”. I am Executive Director of the Prison Policy Initiative, an 11-year-old national non-profit research organization. In general, the Office of Justice Programs should be commended for its willingness to accept data in whatever form states have available, and similarly commended for its efforts to make this data comparable across time and with other jurisdictions.

This is particularly important in the context of race and ethnicity, because many state prison systems do not currently collect data that is compatible with the federal standards as described by the Office of Management and Budget’s “Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity” (October 30, 1997 (62 FR 58782-58790) available at http://www.whitehouse.gov/omb/fedreg_1997standards/). For example, some states do not track “Hispanic status” at all, and other states consider “Hispanic” to be a race.

There are several historical and political reasons for this discrepancy, but in my view the largest cause of the problem is that most state prison systems are unaware of the Office of Management and Budget’s guidance on collecting race and ethnicity data. While the Office of Justice Programs should continue to be flexible in terms of how it accepts data, *these annual data collection programs should also include suggestions on how data systems can be structured in order to facilitate future collections*. In particular, given the median state prison sentence length in this country, changes in how state prisons collect data at intake would, in just a few years, put states in a very different position to answer questions from the federal government.

To be clear, I am not suggesting that the Office of Justice Programs require the states to collect state information differently. I merely suggest that OJP communicate best practices to the state officials responsible for filling out these information requests so that they may choose to embrace the OMB’s suggestions in the future.

Sincerely,



Peter Wagner

Executive Director