Pre-Trial Risk Assessment, Maine Demonstration Project

FINAL REPORT | October 2011

TABLE OF CONTENTS:

In Brief ................................................................. 2
Framing the Issue .................................................. 3
Methodology ......................................................... 6
Research Findings ................................................ 7
Using the Risk Assessment ...................................... 11
Recommendations .................................................. 12
Talking Points ........................................................ 15
References ............................................................. 16
Appendix A: Risk Assessment Validation .................. 17
Appendix B: M.RISK Pre-Release Risk Assessment ....... 20
IN BRIEF

This report represents a number of firsts. It is the first validated pre-trial risk assessment developed in the State of Maine. It is the first in-depth study of a sample of inmates at a Maine correctional facility. It is one of very few pre-trial risk assessments that includes both protective and risk factors. And it is the first phase of a larger initiative we hope will be expanded to other counties across the state.

In the last few years, numerous organizations, including the American Bar Association and the National Institute of Justice, have issued strong recommendations about the need to adopt risk assessment tools in pre-trial decisions. These classification instruments at the pre-trial stage are designed to identify arrestees who are more likely to be a danger to the community and less likely to appear in court.

This report represents a number of firsts... and it is the first phase of a larger initiative we hope will be expanded to other counties across the state.

In the fall of 2009, Two Bridges Regional Jail, Volunteers of America and the University of Southern Maine, Muskie School of Public Service were awarded a grant from the Bureau of Justice Assistance to develop and implement a pre-trial risk assessment tool that would be specifically validated for use in Sagadahoc, Lincoln and Waldo counties in Maine. This is the first such tool to be developed specifically for use in facilities in Maine.

The goal of the Pre-Trial Risk Assessment Pilot Study was to improve the pre-trial case processing system by using the developed risk assessment tool to provide the Judiciary, Prosecutors Office and the Defense Bar with accurate, validated information about a defendant’s risk of violating conditions of bail or failure to appear for court. By having this information available at the time of arraignment, the parties would be better able to make informed decisions about bail conditions thereby reducing the number of higher-risk defendants released while awaiting trial, and reducing the number of low-risk defendants being held in jail while on pre-trial status.

Our research revealed that few pre-trial programs rely on objective criteria when making bail recommendations. Of those who do, 39 percent adopt a classification scheme from another district, while only 25 percent report developing it by using data from their own jurisdiction. Research suggests that risk assessment tools should be piloted and validated within the jurisdiction where the tool is being implemented so that it can successfully predict the outcomes for the population that is being served.

In order to develop our instrument, three full-time pre-trial screeners were hired to collect specific information on every new arrestee (580 offenders) that was brought to the Two Bridges Regional Jail between January and July, 2010. These defendants were then tracked over the following six months to determine if they had either violated the conditions of their release or failed to appear for their court hearing. Subsequently, the follow up data was analyzed to determine which variables were the best predictors of violation or failure to appear. Items that were identified as significant were combined into a draft pre-trial risk assessment instrument. We then validated this data, using a second round of analyses. Based on our research, we found that our tool was found to have good predictive validity for a population of adult defendants.

This report presents details about the process we used, our findings and recommendations for both the use of the tool and for future actions based on the lessons we learned and the data we collected and analyzed. We consider it Phase One of an initiative to gather and assess data related to our inmate population in Maine which will better help us determine risk to the larger community, reduce costs and develop the most appropriate intervention for our particular populations.

The objective of this study was to address the recommendation made by the CAAC in its Interim Report to the Maine Legislature which was to “reduce the average length of pre-trial defendant’s stay within jail.”
FRAMING THE ISSUE

The crime rate in Maine has been steadily decreasing since 1990, while the average daily population in Maine Jails has grown 71 percent. One factor of this growth is an increase in the average length of stay for a pre-trial defendant, which has doubled from 7 days in 1990 to 14 days in 2004. 60 percent of those admissions were due to violation of probation. The Maine State Legislature formed the Corrections Alternatives Advisory Committee (CAAC) in 2005 to study the causes of these increases and provide recommendations to increase the effectiveness and efficiency of Maine’s criminal justice system.1

In its Interim Report to the Maine Legislature, the CAAC made several recommendations, one of which was to “reduce the average length of pre-trial defendant’s stay within jail,” based on the a key finding that a pre-trial defendant’s average length of stay along with probation revocations were increasing costs and the use of jail bed space. The report highlighted problems with the initial assessment of pre-trial risk, including:

- most cases were completed by a Bail Commissioner;
- identification was rarely confirmed through fingerprints;
- limited local criminal history was available;
- self-reported information was limited, e.g.: community ties, residence, employment
- substance use, mental or physical health information was rarely available, and
- information was often relayed by phone by the corrections or police officer.

In the last few years, numerous organizations including the American Bar Association (2002) and the National Institute of Justice (2001) have issued strong recommendations about the need to adopt risk assessments in pretrial decisions. Classification instruments at the pretrial stage are designed to identify arrestees who are more likely to be a danger to the community and less likely to appear in court. To accurately identify high and low-risk arrestees an objective and validated assessment instrument should be used.1

Of the seven main recommendations of CAAC’s final report, three focus on pre-trial procedures, including “changing pre-trial procedures to reduce the average length of stay for those awaiting trial” and integrating “Risk and Need Assessments into Criminal Justice Processing.” The report notes that decisions relating to sentencing and setting of bail, “must be tied to offender risk level. To do this, sentencing judges and post sentencing agencies must use a validated risk assessment method that meaningfully differentiates between offenders who are high, moderate, or low risk. Length of supervision and the services provided must be clearly tied to an offender’s risk level. Sentencing judges need to have options at their disposal that are appropriate for the risk level of the offenders being processed.”2

In the last few years, numerous organizations have issued strong recommendations about the need to adopt risk assessment tools in pre-trial decisions.

It appears that few pre-trial programs (less than 1 in 4) rely on objective criteria when making bail recommendations. Of those who do, 39 percent adopt a classification scheme from another district, while only 25 percent report developing it by using data from their own jurisdiction. Research suggests that risk assessment tools should be piloted and validated within the jurisdiction where the tool is being implemented so that it can successfully predict the outcomes for the population that is being served (Lowenkamp, Lemke and Latessa, 2008.)

History of Pre-Trial Risk Assessments:

In 1961, the Vera Institute created the first pre-trial screening program, the Manhattan bail project, which sought to aid pre-trial agents in making release decisions. The factors incorporated included the defendants’ ties to the area, employment status, education, and prior criminal record. As the first such program of its kind, the Manhattan bail project produced two significant findings.

1. The frequent use of finances as bail forced many defendants to remain in pretrial custody, and
2. Individuals with strong ties to the community were likely to appear at required court proceedings, even if they were not assigned financial bail.
The experiences and findings from the Manhattan bail project were integral to the bail reform movement, but were predicated on the availability and accuracy of information about the defendant prior to release.

Recently, several jurisdictions have attempted to develop and implement objective risk assessments with greater complexity, with regard to the factors included in the instruments as well as the statistical methodologies employed. The Urban Institute developed and validated a risk prediction instrument on a large sample of Washington, DC pretrial defendants (Winterfield, Coggeshall, & Harrell, 2003). The resulting instrument comprised 22 items in two separate subscales; the safety risk scale and the appearance risk scale. Nearly all the incorporated items that predicted either of the outcomes were components of criminal history, demographics (i.e., age, citizenship), current criminal charge, and drug involvement/testing.

In Virginia, the pretrial risk assessment comprises of nine risk factors (VanNostrand, 2003). Six of the nine risk factors are derived from an individual’s criminal history, and three incorporate additional factors such as residential stability, employment, and drug use. The risk assessment is administered by interviewing the defendant; however, individuals conducting the assessment are required to verify all possible information provided by the defendant. VanNostrand used this information to create a risk factor scale from 0-10. Using these scores, VanNostrand found a significant relationship between an individual’s risk factor score and a combined outcome measure of failure to appear/new arrest.

Finally, in one of the most current and complex risk assessment tools developed specifically for pretrial decision-making, Lowencamp et al. (2008) validated a pretrial screening tool for federal defendants that included 63 items covering eight different theoretical risk and need domains to predict both failure to appear and new offenses on release pending sentencing. These included criminal history, pretrial supervision, drug/alcohol use, employment, residence/transportation, mental health, antisocial personality characteristics, and a scale measuring criminal associates. The results of the validation study found that the overall pretrial assessment score was found to be significantly correlated with both failure to appear and new arrest.

The Use of Pre-Trial Risk Assessment Tools:

It appears that jurisdictions often rely on implementing pre-existing tools derived for similar purposes but on different samples. Given that it is unlikely for a single instrument to have universal applicability, research has suggested that adopted assessments should be piloted and validated on the jurisdiction implementing the tool, since the instrument or its classification scales may not be valid for the agency’s specific population (Gottfredson & Moriarty, 2006; Jones, 1996; Wright, Clear, & Dickson, 1984). Specifically, it should be shown that the instrument can successfully predict the outcomes of interest for the population being served (Flores, Travis & Latessa, 2003; Lowenkamp & Latessa, 2002.)

The literature on pre-trial risk assessment tools developed to date shows that the risk factors measured by these tools generally fall into the following broad domains:

- criminal history
- current legal status
- education
- employment
- housing
- mental health
- relational stability
- residency
- substance abuse
- transportation

Despite these common domains, there is nevertheless a great deal of variety in how the factors that fall within each domain are actually measured from one tool to another. For instance, while Kentucky’s Pre-trial Services Risk Assessment defines stable employment as having held one’s present job for over a year, Monroe County’s (NY) tool defines it as having been employed steadily and full-time for the past three years. Likewise, while all tools include variables related to criminal history, there is variety in which elements of criminal history are included. The Ohio Pre-trial Assessment Tool (2009), for instance, includes age at first arrest. Other tools focus on the number of past convictions. Still others distinguish between felony and misdemeanor convictions.

In addition to the variety within broad domains, there are a number of variables included in some tools that do not appear at all in others. Some examples include whether the defendant expects someone to accompany him/her to arraignment, whether the defendant has a telephone, whether the defendant has citizenship, and whether the defendant is affiliated with a gang. While factors such as these may be predictive of risk in some geographical areas, they are not predictive in all areas.
Furthermore, factors that are predictive of risk at a particular time are not necessarily predictive of risk at a later date. Several jurisdictions, including Harris County (TX), Hennepin County (MN), and the state of Virginia, recently re-validated their pre-trial risk assessment tools and found that the ability of factors to predict risk changes over time. This underscores the importance of not only validating a tool to a particular area but also validating it on a regular basis.

Pre-trial risk assessment tools also vary in how they assign scores to each of the risk variables. Some tools use a small scoring range, such as Ohio’s Pre-trial Assessment Tool, which is scored on a scale of 1-8, while others use a large range, such as Maricopa County’s Release Assessment, which involves a range of 142(+). Furthermore, some tools simply total risk points while other tools utilize both negative and positive points in order to account for protective or mitigating factors. Montgomery County’s Pre-Trial Release Risk Instrument, for example, subtracts a point for defendants aged 50 or older. Tools also vary in how they assign weight to variables. The Virginia Pre-trial Risk Assessment Instrument, for instance, includes eight risk factors, seven of which are worth one point, while the remaining factor—failure to appear, which is highly predictive of risk—is worth two.

Some of the variety seen between pre-trial risk assessment tools is no doubt due to the difference in populations served by the different tools. Some tools are designed to be used in a relatively small geographic area—New York City, for instance, validated a tool of its own. Other tools are designed to be used more broadly—Colorado, in another instance, validated a tool in 10 counties throughout the state. These areas vary not only in size, but also in population density. New York City with its urban composition is quite different from a county in Colorado that comprises both urban and rural areas. In fact, rural areas as a whole are underrepresented in the literature. While they are represented to some degree by studies such as Colorado’s, no studies to date focus exclusively on areas that are primarily rural in nature.
METHODOLOGY

The goal of the Pre-Trial Risk Assessment Pilot Study was to improve the pre-trial case processing system by using the developed risk assessment tool to provide the Judiciary, Prosecutors Office and the Defense Bar with accurate, validated information about a defendant’s risk of violating conditions of bail or failure to appear for court. By having this information available at the time of arraignment, the parties are better able to make informed decisions about bail conditions thereby reducing the number of higher-risk defendants released while awaiting trial, and reducing the number of low-risk defendants being held in jail while on pre-trial status.

The Study included a review of previous pre-trial studies and assessments, which were used to develop a structured interview questionnaire using elements from past assessments that have been shown to be most predictive of failing to appear (FTA) and being arrested under pre-trial supervision (recidivism.)

While the findings of our study are important to review and analyze, what is of equal importance to learn from is the process by which we conducted our study. There were benefits derived from our methodology that have implications on how we conduct research in the future that are important to highlight.

The findings of our study are important to review and analyze, what is of equal importance to learn from is the process by which we conducted our study.

Our Process:
The following outlines the process we used to develop the pre-trial risk assessment instrument, each documented component was vital to the success of our research and should be considered necessary when considering replication of this study:

Volunteers of America Northern New England hired three full time pre-trial screeners to collect the data for this study. They were supervised by the Director of Corrections, an existing staff person from Volunteers of America.

Their duties were to collect specific information, identified by the Muskie School and Volunteers of America, on every new arrestee that was brought to the Two Bridges Regional Jail. The screeners were trained by Muskie School researchers in data collection methods; the accuracy and completeness of the data was paramount to accurate findings.

A screener was on duty at the Two Bridges Regional Jail 24 hours a day, seven days a week in order to capture all of the data required.

Each documented component was vital to the success of our research and should be considered necessary when considering replication of this study.

Screeners used a structured questionnaire to gather information on a series of factors that have been shown to be predictors of FTA and new crime recidivism, including criminal history, probation history, employment, mental and medical health, and residency. Information obtained was verified, when possible, through a review of the individual’s case file information.

The interview included information normally used by pre-trial agencies, as well as new factors. More than 100 questions were included in the interview.

Data Collection:
The data collection phase was conducted over a period of six months.

The defendants who were entered into the system were then tracked over the following six months to determine if they had either violated the conditions of their release or failed to appear for their court hearing.

The defendant was tracked using county court records, reports from pre-trial supervision officers, and the state criminal history records system for whether they failed to appear at a court hearing (FTA) and/or whether any new offense occurred while they were released.

The information was then entered into a database and collected by the Muskie School on a monthly basis for analysis.
It is important to note that this is a study not of a defendant’s risk as it relates to future violent acts, but of their risk of either violating the conditions of their release or failing to appeal for their court hearing.

**Data Analysis:**
The follow up data was then analyzed by the Muskie School to determine which variables were the best predictors of violation or failure to appear. The risk factors were then separated from the other information collected by the screeners and developed into a pre-trial risk assessment tool to be used on new arrestees prior to arraignment to provide information to the judges, district attorneys and defense attorneys.

Once data was collected, individual items from the data collection tool that have a significant relationship with the outcome measures were identified, using chi-square correlations statistics. Items that were identified as significant were combined into a draft pre-trial risk assessment instrument.

A series of cross-tabulation analyses was then be used to create cut-off values in the distribution of risk scores of the construction sample in order to classify defendants as low, moderate and high risk for receiving an FTA or to commit a new offense while under supervision.

This second round of analyses examined the ability of the draft pre-trial assessment to distinguish among risk groups by evaluating their respective failure rates.
RESEARCH FINDINGS

Demographics:
What we learned by simply looking at the demographics of our sample of offenders is worth noting and recommending for replication. The process of collecting and analyzing demographic data on a sample of a jail’s population is beneficial for tracking trends over time and developing appropriate programming/interventions for a specific population.

Our researchers analyzed a sample of 580 offenders who entered the Two Bridges Jail in Wiscasset between January and July, 2010. From this sample, we learned the following:

- More than three-quarters (76%) were male.
- Whites accounted for 96.2% of the sample.
- The majority (56.2%) were single, with 43.8% married or with a partner.
- The mean age of probationers in the sample was 33, with a median of 30.
- Those with some college or more accounted for only 15.7% of the sample.
- More than half (57.0%) had completed high school or a GED.
- More than a quarter of the sample (27.3%) had less than a HS diploma.

Charges:
The following details the charges filed against individuals within the sample population we studied:

- More than two thirds of the sample (68.4%) was arrested for one offense.
- The most serious offense class associated with the arrest was a misdemeanor.
- The most serious charge type associated with the arrest was most often a probation or bail violation.
- Just over one fifth of the sample had pending charges and was currently out on bail, and slightly more (21.9%) were on probation when arrested.
- The most common criminal histories were prior probation, prior probation violations, and prior bail violations.

### TABLE 1 Characteristics of Two Bridges Entrants, 01-07, 2010

<table>
<thead>
<tr>
<th>Sex</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>441</td>
<td>76.0%</td>
</tr>
<tr>
<td>Female</td>
<td>139</td>
<td>24.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Race</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>558</td>
<td>96.2%</td>
</tr>
<tr>
<td>Non-White</td>
<td>22</td>
<td>3.8%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Marital Status</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single</td>
<td>296</td>
<td>56.2%</td>
</tr>
<tr>
<td>Married</td>
<td>231</td>
<td>43.8%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Age</th>
<th>Mean</th>
<th>SD (11.7)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Median</td>
<td>30</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Highest Grade Completed</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 11th grade</td>
<td>146</td>
<td>27.3%</td>
</tr>
<tr>
<td>12th grade / GED</td>
<td>305</td>
<td>57.0%</td>
</tr>
<tr>
<td>Some college or more</td>
<td>84</td>
<td>15.7%</td>
</tr>
</tbody>
</table>

### TABLE 2 Characteristics of Charges of Two Bridges Entrants, 01-07, 2010

<table>
<thead>
<tr>
<th>Charges</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Most Serious Offense Type</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Felony</td>
<td>187</td>
<td>32.2%</td>
</tr>
<tr>
<td>Misdemeanor</td>
<td>351</td>
<td>60.5%</td>
</tr>
<tr>
<td>Missing</td>
<td>42</td>
<td>7.2%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Most Serious Charge Type</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Person</td>
<td>64</td>
<td>11.2%</td>
</tr>
<tr>
<td>Property</td>
<td>81</td>
<td>4.0%</td>
</tr>
<tr>
<td>Drug/Alcohol</td>
<td>94</td>
<td>16.2%</td>
</tr>
<tr>
<td>Other</td>
<td>41</td>
<td>7.0%</td>
</tr>
<tr>
<td>Violation (Failure to pay fine, Violation of Conditions of Release, Probation Violation, etc)</td>
<td>299</td>
<td>51.6%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Status</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pending Charges</td>
<td>120</td>
<td>20.7%</td>
</tr>
<tr>
<td>Current Charge DV</td>
<td>53</td>
<td>9.1%</td>
</tr>
<tr>
<td>Currently on Probation</td>
<td>127</td>
<td>21.9%</td>
</tr>
<tr>
<td>Currently on Probation for a Felony</td>
<td>69</td>
<td>11.9%</td>
</tr>
<tr>
<td>Currently Out on Bail</td>
<td>120</td>
<td>20.7%</td>
</tr>
<tr>
<td>Current Warrant on Any Charge</td>
<td>88</td>
<td>15.2%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Prior Charges</th>
<th>N</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior Probation</td>
<td>180</td>
<td>31.0%</td>
</tr>
<tr>
<td>Prior Probation Violations</td>
<td>150</td>
<td>25.9%</td>
</tr>
<tr>
<td>Prior Bail Violations</td>
<td>171</td>
<td>29.5%</td>
</tr>
<tr>
<td>Prior FTPF</td>
<td>112</td>
<td>19.3%</td>
</tr>
<tr>
<td>Prior FTA</td>
<td>76</td>
<td>13.1%</td>
</tr>
<tr>
<td>History of Felony Convicts</td>
<td>120</td>
<td>20.7%</td>
</tr>
</tbody>
</table>
Substance Use:
The following outlines use of substances, as reported by the individuals within the sample we studied:

- Just over one third of the sample reported using alcohol.
- Of those, 15.2% reported drinking four times a week or more and 20.8% reported drinking six or more beers per occurrence.
- Almost 40% reported receiving treatment for either drug or alcohol in the past.
- 17.8% of the sample was under the influence at the time of the offense.

| TABLE 3 Substance Abuse Characteristics of Two Bridges Entrants, 01–07 2010 |
|-----------------|-----|-----|
| Use Alcohol     | N   | %   |
| Yes             | 197 | 34.0% |
| No              | 147 | 25.3% |
| How Much (of those reported yes to drinking) | N | % |
| 1–2 Drinks      | 74  | 37.5% |
| 3–5 Drinks      | 30  | 15.2% |
| 6+ Drinks       | 31  | 20.8% |
| How Often (of those reported yes to drinking) | N | % |
| Rarely (less than once a week) | 69 | 35.0% |
| 3 x Weekly or Less | 70 | 35.5% |
| 4 x Weekly or More | 30 | 15.2% |
| Under Influence (at time of offence) | N | % |
| Yes             | 103 | 17.8% |
| Prior Treatment | N   | %   |
| Alcohol         | 97  | 16.7% |
| Drugs           | 142 | 24.5% |
| Alcohol or Drugs| 230 | 39.7% |

Jail stays:
Of the 580 arrestees who were screened during the first six months of 2010, 72% or 417 were released prior to their court appointment, while the remainder who held until their court date.

| TABLE 4 Releases of Two Bridges Entrants, 01–07 2010 |
|-----------------|-----|-----|
| Total Held Until Court Date (including PTPFs) | N | % |
| Total released prior to court (sample)       | 417 | 72.0% |
| Total                                          | 580 | 28.0% |

Of the arrestees who were released:
- Nearly half (49.1%) of the arrestees released had conditions placed during their pre-trial period. The two most common conditions were an alcohol prohibition (43.6%) and random search without cause (41.6%).
- Nearly a quarter (23.4%) was prohibited from making contact with the victim and slightly more than 20% (21.8%) were not allowed to possess a weapon.
- Many of these conditions were placed on arrestees charged with a person crime, such as a domestic violence assault.

| TABLE 5 Jail Days of Two Bridges Entrants, 01–07 2010 |
|-----------------|-----|-----|

Six month Recidivism Rates:
To avoid distortion in comparison of recidivism rates due to different lengths of time spent in the community, researchers tracked arrestees for six months following release from jail. Recidivism is defined as either a re-arrest for new criminal conduct prior to court, or a failure to appear to court.

What is important to note (for this study and for future studies) is that our sample consisted of arrestees who were released from jail who had no conditions assigned to them. This is an important distinction because it reduced the sample size from 417 to 220.

This report only looked at cases where no conditions were assigned because the tool was intended to help assess risk prior to conditions being set. Conditions can bias the outcomes of arrestees, and the tool was created to measure the inherent characteristics and living arrangements of the arrestee that could lead to an adverse outcome.
Overall, 10.5% of the 220 released from jail without conditions returned within 6 months for new criminal conduct or a failure to appear. Just 4.5% of the arrestees released from custody failed to appear (FTA) in court during the six month period.

**Significant Predictors:**
Using chi-square analyses, this study identifies differences among arrestees who recidivated and those who did not. From a total of more than 100 possible predictors, items were selected based on their relationship to the outcome of interest: pre-trial recidivism (failure to appear or a new arrest).

These statistics identified nine predictive items, four of which are risk factors and five are protective factors. This study is unique among pre-trial risk assessments because we included both risk factors and protective factors. We included protective factors because these factors reduce the risk of violations and failures to appear for court dates.

These statistics identified nine predictive items, four of which are risk factors and five are protective factors.

Table 8 shows these nine factors. It is important to note that the number reported in the table represents only the number of individuals who received a FTA or were arrested for a new criminal offense. As indicated below, nine factors emerged as significant predictors (p<.15) of a subsequent recidivating offense. These factors can be subsumed under risk factors (current pending charges, failure to appear in court in the last 24 months, prior failure to pay a fine, whether their driver’s license was or is currently suspended), and protective factors (having a High School or GED diploma, living with their biological children, having medical insurance, prior substance abuse/alcohol treatment and whether they have a reliable vehicle.)

**Felony Personal Offense and Domestic Violence:**
Two additional items, whether the defendant is currently charged with a felony personal offense and whether one of the current charges DV related, were incorporated into the assessment despite their statistical non-significance. The decision to include these items was based on a review of the instrument by pre-trial staff and local law enforcement officials who indicated that these items, regardless of their statistical relationship with outcomes, were required for the instrument to have face validity. Therefore, these items were added to the model and had little effect on predictive power.

**Risk Factors:**
Each of the risk factors was assigned a weight of +1 when the respondent answered “yes” to the question asked during their intake assessment. Protective factors were assigned a scoring weight of -1 if the respondent answered affirmatively.
Scoring System:
The scoring system for the assessment is designed to be straightforward and simple: For each risk factor present, the scorer adds one point, and to calculate total score, the scorer subtracts the number of protective factors from risk factors.

**Low Risk** Individuals who score a negative number on the risk assessment are classified as low risk, or individuals unlikely either to receive an FTA or to commit a new offense.

**Medium Risk** Individuals who score a zero on the risk assessment are classified as medium risk, and were substantively more likely than low-risk individuals to re-offend in either outcome measure.

**High Risk** High-risk individuals scored a positive number on the assessment and were the most likely classification to recidivate.

Protective Factors:
Currently most bail decisions are made based on the current charge and criminal history and take little consideration of other factors in the defendant's life. The Pre-Trial Risk Assessment Tool incorporates Protective Factors in the total risk score. These factors, such as employment, stable living environment and previous success while on pre-trial status, reduce the risk of violations and failures to appear for court dates. When decision-makers have the opportunity to take these facts into account, they can set bail that is appropriate to the defendant's current situation. The desired outcome is that defendants who have a low-risk of violating conditions or failing to appear will be released, thus reducing the pre-trial populations being held in the facility.

Override Option:
The tool also includes an important override variable: Is one of the current charges Domestic Violence (DV) related? If an individual is arrested with a DV-related charge, the risk level is automatically increased by one level.

The reason for the override is to acknowledge that pre-trial conditions are required in domestic violence cases to maintain balance between the constitutional right of the accused and the protections of victims from crime.
**RECOMMENDATIONS**

The current study attempted to add to the risk assessment literature by constructing and validating a pretrial risk instrument. Using data from 196 adult offenders, nine items were selected to comprise the pretrial instrument, and the pretrial assessment score was found to be significantly correlated with an arrest for either failure to appear or new criminal conduct. When the cut-off scores were examined, the pretrial instrument successfully differentiated between low-risk defendants, medium-risk defendants and high-risk defendants.

Our recommendations are broken down into three categories: Statewide Replication; Effective Policy; and Suggested Further Research.

**Statewide Replication**

The pretrial assessment was found to have good predictive validity for a population of adult defendants. The ability to identify higher-risk defendants for the purposes of safety and the allocation of agency resources is an important aspect of a valid risk assessment.

The importance of conducting the research necessary to develop and validate a pre-trial risk assessment with the population to whom the assessment will be administered cannot be underscored enough. While certain lessons hold up when generalized to the broad spectrum of defendant populations, regional and demographic differences that impact an accurate assessment of risk do appear. For this reason and based on the results of our research in Lincoln and Sagadahoc County, we recommend validating and implementing the use of the M.RISK in every jurisdiction in the state.

**We offer the following road map for achieving this goal:**

» Implementation is broken down into Three Phases, executed across two tracks.

» Track A focuses on the roll out process of validating M.RISK in every jurisdiction in the State.

» Track B focuses on informing practitioners of the features and benefits of using M.RISK.

» We recommend these tracks run contiguously so that M•RISK is being validated in each jurisdiction, it is also being introduced to the system.

**Current status of implementation in Maine**
Phase One has been completed in Lincoln and Sagadahoc Counties; Phase Two is being executed currently in Penobscot County; and Phase Three would be to validate in subsequent counties.

The visual below highlights the status of implementation of MRISK in Maine as of the date of this report.

The ideal sample size for Phase Three is 1000 pre-trial defendants from across the state broken down into representative subpopulations: women, men, minorities, etc.

We recommend implementing the M•RISK with the pretrial defendants referenced above; and subsequently tracking the defendants and assessing their progress in 6 months to determine the accuracy of the risk assessment. Once M•RISK has been validated, it can be used to make recommendations for conditions of release.

We also suggest that M•RISK is “re-validated” every 3 -5 years in each jurisdiction.
Effective Policy
There are a number of questions that resulted from our research that policy makers should consider reviewing to improve our statewide pre-release system.

Low-Risk Defendants:
Risk assessments should accurately identify those low-risk defendants who do not need such supervision or detention. As Lowenkamp and Latessa (2004) suggest, assigning intense supervision or preventative detention to low-risk defendants either removes the individual from pro-social aspects of their life or exposes them to risk factors that were previously nonexistent in the defendant’s life. Either way, these actions put the defendant at greater risk of recidivism or negative supervision outcomes.

The M.RISK was developed as a strategy to reduce the likelihood of recidivism and as such, should consider the effects of intense supervision or preventative detention to low-risk defendants. Just as important as is it to emphasize the need for appropriate conditions for high risk offenders, it is important to emphasize the negative impact (on society) of too much intervention for low risk offenders.

Protective Factors:
The M.RISK is unique in that it equally weighs protective and risk factors. Most tools do not consider protective factors, and even fewer assign negative points to them. We recommend including protective factors in any risk assessment that is developed because protective factors have an impact on predicting recidivism.

Related Variables:
Some variables that emerged as significant predictors may be proxies for other variables. For example, living with biological children may be a proxy for housing stability. Likewise, having medical insurance may be a proxy for health insurance. Alternately, medical insurance may mean a person is able to receive mental health services. Because of these possibilities, any validation effort should include additional, related variables to test.

Risk Principal:
The Risk Principal is an important learning that needs to be highlighted in this study as it has significant potential impact on how we treat our defendant populations, how we expend our limited resources, and what we can expect as outcomes depending upon which intervention (and whether or not) we choose.

What is important to note is that intervention should target higher risk offenders. Intensive treatment for lower risk offenders can increase recidivism. What we know from our work is that we rely on accurate assessment of risk in order to apply intervention to only the higher risk offenders. One might assume that any intervention is helpful, whether the offender is at high or low risk of recidivism. In reality, intervention is not only wasted on lower risk offenders, it can actually have the opposite effect and increase their chances to recidivate.

Bail as a Condition of Release:
If we are using bail as a means to keep someone from failing to appear or violating their conditions of release, it only has the potential to work for those who have the financial means to actually make bail. For those who do not, they remain incarcerated awaiting trial, which we know from our research actually increases their chances of recidivating when they are finally released. In this way, we are punishing poverty and negatively impacting our system by potentially keeping people in jail awaiting trial whose only reason (related to risk) to needing to remain in jail is lack of finances.

We recommend reconsidering bail for low-risk defendants who have no financial means to actually make bail. Close ties to community is a much better predictor of success than assigning bail. So, the person with limited financial means should be assessed for ties to the community. Assigning bail to this person may keep them in jail unnecessarily if, in fact, their ties to the community are strong. In this way, we waste our limited resources on incarcerating a person whose chance at recidivating is not high.

Further Research:
Our study raised as many questions to explore through further research as it answered. The following is a list of topics we suggest are important to consider for potential further research:

» How do rural areas differ from urban in terms of risk factors?
» How would we conduct a similar study looking at factors that predict violence?
» How could we test our tool against past cases to prove its effectiveness?
» How many resources could be saved from using this tool across the state?
Data collectors should be allocated a portion of their work time to focus on data collection, versus this work being an “add on” to existing work duties. It cannot be stressed enough that a good deal of the success of this study was due to the fact that Case Managers were able to focus their efforts on data collection, thus engaging them in the study and ensuring accurate and timely results.

Final Thoughts:
The completion of this project and the development of the M.RISK provide the State of Maine with a unique opportunity to address important enhancements to our correctional systems. We have done the “heavy lifting” by creating a comprehensive database that allowed us to analyze, test and identify variables that can be predictive of failure and success with regard to pre-release conditions. By validating the already-established M.RISK in each jurisdiction in the state and integrating its use by the correctional system in each jurisdiction across the state, we ensure the most appropriate conditions are placed on pre-release defendants, saving the system time and money and ensuring safety for all of our communities.

Partnerships:
The “how” of doing this study was an important component to its success. This partnership – correctional facility, community-based organization and research institution – represented a unique and productive partnership that should be considered when conducting further research to address complex correctional challenges.

Staff conducting the research should be trained in appropriate research methods by parties in order to ensure accurate and valid data collection. The case managers hired for this project were trained in basic data collection methods by the Muskie School of Public Service.

The facility in which the research is being conducted should be willing to give access to records, defendants and staff to the data collectors (in this case, Volunteers of America case managers) in order to facilitate timely and cost-effective research. Two Bridges Regional Jail administrators and staff gave Volunteers of America case managers full and flexible access to defendants and supporting research material.
The crime rate in Maine has been steadily decreasing since 1990, while the average daily population in Maine Jails has grown 71%. One factor of this growth is an increase in the average length of stay for a pre-trial defendant, which has doubled from 7 days in 1990 to 14 days in 2004. 60% of those admissions were due to violation of probation.

The Maine State Legislature formed the Corrections Alternatives Advisory Committee (CAAC) in 2005 to study the causes of these increases and provide recommendations to increase the effectiveness and efficiency of Maine’s criminal justice system. In its Interim Report to the Maine Legislature, the CAAC made several recommendations, one of which was to “reduce the average length of pre-trial defendant’s stay within jail,” based on the key finding that a pre-trial defendant’s average length of stay along with probation revocations were increasing costs and the use of jail bed space.

This study represents an attempt by Two Bridges Regional Jail, in partnership with Volunteers of America and the USM Muskie School of Public Service, to create a strategy to reduce the average length of pre-trial defendants’ stay within jail.

This study was funded by the US Department of Justice, Bureau of Justice Assistance as part of the American Recovery and Reinvestment Act.

Three full-time case managers were hired by Volunteers of America Northern New England to screen every defendant that came through the doors of the jail between January and July 2010.

Currently most bail decisions are made based on the current charge and criminal history and take little consideration of other factors in the defendant’s life. Our tool incorporates Protective Factors in the total risk score. These factors, such as employment, stable living environment and previous success while on pre-trial status, reduce the risk of violations and failures to appear for court dates. When decision-makers have the opportunity to take these facts into account, they can set bail that is appropriate to the defendant’s current situation. The desired outcome is that defendants who have a low-risk of violating conditions or failing to appear will be released, thus reducing the pre-trial populations being held in the facility.

This risk assessment tool is designed to assist in the pre-trial case management decision process by providing an assessment of risk of an arrest for a new crime prior to trial.

This report only looked at cases where no conditions were assigned because the tool was intended to help assess risk prior to conditions being set. Conditions can bias the outcomes of arrestees, and the tool was created to measure the inherent characteristics and living arrangements of the arrestee that could lead to an adverse outcome.

It is important to note that this is a study not of a defendant’s risk as it relates to future violent acts, but of their risk of either violating the conditions of their release or failed to appear for their court hearing.

The study identified the following predictive factors:

- Risk factors include current pending charges, failure to appear in court in the last 24 months, prior failure to pay a fine, and whether their drivers license was or is currently suspended.
- Protective factors include having a High School or GED diploma, living with their biological children, having medical insurance, prior substance abuse/alcohol treatment and whether they have a reliable vehicle.

The practical utility of a risk assessment lies in its ability to accurately distinguish between risk groups of defendants (low, medium, and high) for the purposes of case planning, resource allocation, and supervision. As demonstrated by our analysis, there is considerable difference in the failure rates between risk categories. Only 1.8 percent of those classified as low-risk defendants were arrested, compared to 6.3 percent of medium-risk defendants, and 32.4 percent for high-risk groups.

This tool is not meant to be used as the only decision-making factor, but instead to be used in conjunction with other information gathered at the time of screening.

This tool helps identify those defendants who may benefit most from pre-trial services, and those who may be appropriate for release with no pre-trial services.

No risk assessment tool can predict the future.

The tool was developed to be completed quickly during the intake assessment process.

Based on the analysis of our results, the tool is a good predictor of recidivism during the pre-trial period.
REFERENCES


**Pretrial Risk Assessments Examined**

» *Colorado Bond Conditions Assessment (COBCA)*

» *Hennepin County, MN (2006)*

» *Lane County, OR (2009)*

» *Kentucky Pretrial Services (2008)*

» *Ohio Pretrial Assessment Tool (2009)*

» *Outgamie and Racine Counties, WI (2006, 2009)*

» *Virginia Pretrial Assessment Instrument (2009)*
APPENDIX A
RISK ASSESSMENT VALIDATION
A majority of the defendants in the sample were classified as low risk (n=114), followed by medium risk (n=48), with fewer defendants classified as high risk (n=34). Table 10 reports the number of defendants assigned to each risk level and failure rates attributed to those risk levels.

<table>
<thead>
<tr>
<th>Risk Category</th>
<th>N</th>
<th>Failure Rate of sample: Arrest</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>114</td>
<td>1.8%</td>
</tr>
<tr>
<td>Medium</td>
<td>48</td>
<td>6.3%</td>
</tr>
<tr>
<td>High</td>
<td>34</td>
<td>32.4%</td>
</tr>
</tbody>
</table>

* Pearson x^2=33.018, p< .001

The practical utility of a risk assessment lies in its ability to accurately distinguish between risk groups of defendants (low, medium, and high) for the purposes of case planning, resource allocation, and supervision. As demonstrated by the analysis, there is considerable difference in the failure rates between risk categories. Only 1.8 percent of those classified as low-risk defendants were arrested, compared to 6.3 percent of medium-risk defendants, and 32.4 percent for high-risk groups. These failure rates are illustrated in Table 10.

**Validation Analysis:**

With the assessment constructed and risk level cutoffs created, the next analyses have the purpose of testing the assessment on the sample. To test the linear relationship between the pre-trial assessment score and outcomes, a bivariate correlation analysis and a Receiver Operating Characteristic (ROC) analysis were conducted. Under the bivariate analysis, the total score was significantly correlated with the recidivism measure (either a new arrest for criminal conduct or a FTA) at a score of .377 (see Table 11.)

The Receiver Operating Characteristic (ROC) curve plots the true positives and the false positives at each level of the risk scale and the Area Under the Curve (AUC) statistic can be calculated and used as a measure of predictive accuracy. A ROC curve is a graphical representation of the trade off between the false negative and false positive rates, i.e. it is the trade off between sensitivity (Sn) and specificity (Sp). The ROC analysis, therefore, plots sensitivity against specificity. You can quantify the accuracy of a ‘test’ using an ROC curve by measuring the area under the 8 pt curve, (commonly

---

**Table 9** Distribution of Failure Rates Across Total Assessment Score

<table>
<thead>
<tr>
<th>Total Score</th>
<th>N</th>
<th>% of Total</th>
<th>Failure Rate of sample: Arrest</th>
</tr>
</thead>
<tbody>
<tr>
<td>-5</td>
<td>0</td>
<td>0.0</td>
<td>—</td>
</tr>
<tr>
<td>-4</td>
<td>4</td>
<td>2.0</td>
<td>0.0%</td>
</tr>
<tr>
<td>-3</td>
<td>16</td>
<td>8.2</td>
<td>0.0%</td>
</tr>
<tr>
<td>-2</td>
<td>43</td>
<td>21.9</td>
<td>0.0%</td>
</tr>
<tr>
<td>-1</td>
<td>56</td>
<td>28.6</td>
<td>3.6%</td>
</tr>
<tr>
<td>0</td>
<td>46</td>
<td>23.5</td>
<td>8.7%</td>
</tr>
<tr>
<td>1</td>
<td>21</td>
<td>10.7</td>
<td>33.3%</td>
</tr>
<tr>
<td>2</td>
<td>8</td>
<td>4.1</td>
<td>25.0%</td>
</tr>
<tr>
<td>3</td>
<td>2</td>
<td>1.0</td>
<td>50.0%</td>
</tr>
<tr>
<td>4</td>
<td>0</td>
<td>0.0</td>
<td>—</td>
</tr>
<tr>
<td>5</td>
<td>0</td>
<td>0.0</td>
<td>—</td>
</tr>
</tbody>
</table>

A series of cross-tabulation analyses were used to create cut-off values in the distribution of risk scores of the sample. From these cross-tabulations, an optimal cut-off score was devised with three categories. Individuals who scored a negative number on the risk assessment were classified as low risk, or individuals unlikely to either receive an FTA or to commit a new offense. Individuals who scored a zero on the risk assessment were classified as medium risk, and were substantively more likely than low-risk individuals to re-offend in either outcome measure.

High-risk individuals scored a positive number on the assessment and were the most likely classification to recidivate.
referred to as the Area Under the Curve or AUC). The area under the curve is a useful value because if the area under the curve is 1.0, this means that you have an ideal test (though in the real world, this is very unlikely to happen), because it achieves both 100% sensitivity and 100% specificity. If the area under the curve is 0.5, then the test has 50% sensitivity and 50% specificity, which would be no better than flipping a coin. In general terms, an AUC between 0.90 and 1 is considered excellent, between 0.80 and 0.90 good, between 0.70 to 0.80 fair, between 0.60 to 0.70 poor and between 0.50 and 0.60 a fail (i.e. a reveals a test that fails to identify whatever it is supposed to identify).

**Validity of Tool**
Under the Area Under the Curve statistic, the model scored a value of 0.823, which would suggest the tool does a good job of predicting recidivism during the pre-trial period.

**Limitations:**
The current study has some methodological limitations that should be addressed. The first is the relatively small size of the sample. Due to the size of the sample and the voluntary nature of the research, arguments could be made that this sample is likely to represent a subgroup of pre-trial defendants who are lower risk or who are more apt to comply with supervision requirements. If this is the case, there is a chance that the sample characteristics could have limited the robustness of the predictive ability of items and the assessment in its entirety. This problem is inherent in the initial study of any assessment and only additional studies and samples will confirm either argument.

Another limitation is that screeners relied on self reporting for some variables. While criminal history, employment, and residency could be verified, substance use could not. Some defendants may be hesitant to provide information about their alcohol or drug use, and missing data on many of these variables led to their exclusion from the analysis.

Under the Area Under the Curve statistic, the model scored a value of 0.823, which would suggest the tool does a good job of predicting recidivism during the pre-trial period.
APPENDIX B

M.RISK PRE-TRIAL RISK ASSESSMENT
### Instructions:
Enter ‘1’ for each present variable. To calculate total score, subtract protective factors from Risk Factors.

### Risk Level:
- **Low**: -5 to -1
- **Medium**: 0
- **High**: 1 to 5

#### PRE-TRIAL RISK ASSESSMENT TOOL

**Risk Factors**

1. **Is the defendant currently charged with a felony personal offense?**
   - A personal offense such as assault, domestic violence, robbery, criminal threatening, harassment, unlawful sexual contact, gross sexual assault, manslaughter.

2. **Does the defendant have current pending charges?**
   - Enter ‘1’ if defendant has charges that do not have court dispositions because they are awaiting trial/court.

3. **Does the defendant have at least one Failure to Appear in past 24 months?**
   - Enter ‘1’ if the defendant has been charged with FTA in the previous 24 months.

4. **Does the defendant have any prior FTPFs?**
   - Enter ‘1’ if defendant has any prior FTPF charge.

5. **Is the Defendant’s drivers license currently suspended?**
   - Enter ‘1’ if defendant’s license is currently suspended.

**Protective Factors**

6. **Does the Defendant have at least a high school diploma or GED?**
   - Enter ‘1’ if defendant attained at least high school diploma or general education degree.

7. **Does the defendant live with his/her biological children?**
   - Enter ‘1’ if defendant lives with biological children.

8. **Does defendant have health insurance?**
   - Enter ‘1’ if defendant has health insurance (which includes both private and public insurance, such as Medicaid).

9. **Has the defendant received or is currently receiving alcohol treatment?**
   - Enter ‘1’ if defendant reports receiving treatment for alcohol abuse in the past, regardless of whether that treatment was completed or not.

10. **Does the defendant have access to a reliable vehicle?**
    - Enter ‘1’ if defendant has access to a reliable vehicle.

**Total Score** (Risk Factor Sub Score – Protective Factor Sub Score)

**Is one of current charges DV related?** (IF YES, INCREASE RISK LEVEL BY ONE LEVEL)
- Enter ‘1’ if one of current charges is DV related (DV assault, Protection from Abuse).

---

Project Partners: Two Bridges Regional Jail / USM Muskie School of Public Service / Volunteers of America Northern New England

This document was prepared by the above named partners under grant number 2009-SD-B9-0025 awarded by the Bureau of Justice Assistance, Office of Justice Programs, U. S. Department of Justice.

October 2011
INSTRUCTIONS FOR FORM

Risk Factors:
1. Is the defendant currently charged with a felony personal offense? Enter '1' if:
   - One of current charges is both a felony (class A, B, or C), and
   - A personal offense such as assault, domestic violence, robbery, criminal threatening, harassment, unlawful sexual contact, gross sexual assault, manslaughter.

2. Does the defendant have current pending charges that have not been resolved in court?
   - Enter '1' if defendant has charges that do not have court dispositions because they are awaiting trial/court.

3. Does the defendant have at least one prior Failure to Appear (FTA) in past 24 months?
   - Enter '1' if the defendant has been charged with FTA in the previous 24 months.

4. Does the defendant have any prior Failure to Pay Fine (FTPf)?
   - Enter '1' if defendant has any prior FTPf charge.

5. Is the Defendant’s driver’s license currently suspended?
   - Enter ‘1’ if defendant’s license is currently suspended.

Protective Factors:
Does the Defendant have at least a high school diploma or GED?
   - Enter ‘1’ if defendant attained at least high school diploma or general education degree.

Does the defendant live with his/her biological children?
   - Enter ‘1’ if defendant lives with biological children.

Does defendant have health insurance?
   - Enter ‘1’ if defendant has health insurance (which includes both private and public insurance, such as Medicaid).

Has the defendant had prior or alcohol treatment?
   - Enter ‘1’ if Defendant reports receiving treatment for alcohol abuse in the past, regardless of whether that treatment was completed or not.

Does the defendant have access to a reliable vehicle?
   - Enter ‘1’ if defendant has access to a reliable vehicle.

Override factor:
Is one of the current charges DV related?
   - Enter ‘1’ if one of current charges is DV related (DV assault, Protection from Abuse).
John Doe was arrested on 7/1/11 by the Smalltown Police and Department and charged with the offense of Operating Under the Influence. Mr. Doe has been screened by a pre-trial case worker to obtain information to evaluate his risk level for failing to appear for court or violating his conditions of release if granted bail. The following is the result of that screening:

M•RISK Score:
The defendant’s risk score is based on the following variables:

<table>
<thead>
<tr>
<th></th>
<th>Risk Factors</th>
<th>Protective Factors</th>
<th>TOTAL M•RISK SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
<td></td>
<td>-4</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Recommendation:

Based on Mr. Doe’s M•RISK score and the absence of any criminal history within the last 5 years, it is the recommendation of the Pre-Trial Service Agency that Mr. Doe could be safely released on bail without the necessity of cash or a bail supervision contract.

Copies of the M•RISK, Defendant Screening and criminal history are attached to this report.

Signed: John Smith
Printed Name: John Smith, Case Worker
Agency: Pre-Trial Service Agency

Project Partners: Two Bridges Regional Jail / USM Muskie School of Public Service / Volunteers of America Northern New England
This document was prepared by the above named partners under grant number 2009-SD-B9-0025 awarded by the Bureau of Justice Assistance, Office of Justice Programs, U. S. Department of Justice.
M•RISK Score:
The defendant’s risk score is based on the following variables:

- Risk Factors
- Protective Factors

Recommendation:

Copies of the M•RISK, Defendant Screening and criminal history are attached to this report.

Signed: ________________________________

Printed Name: ________________________________

Agency: ________________________________