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July 13, 2020

Steven T. James
House Clerk
State House Room 145
Boston, MA 02133

Michael D. Hurley
Senate Clerk
State House Room 335
Boston, MA 02133

Dear Clerk James and Clerk Hurley:

Pursuant to Chapter 69 of the Acts of 2018, the Executive Office of Technology Services and Security (EOTSS) is pleased to provide you with the enclosed report on Data Collection and Reporting in the Massachusetts Criminal Justice System produced by the Justice Reinvestment Policy Oversight Board.

I am grateful for your continued partnership with EOTSS. Please feel free to contact Scott Ahern at Scott.m.ahern@mass.gov should you have any questions about this report.

Sincerely,

A handwritten signature in cursive script that reads "Curtis M. Wood".

Curtis M. Wood
Secretary, Executive Office of Technology Services and Security



Data Collection and Reporting in the Massachusetts Criminal Justice System

A Report of the Justice Reinvestment Policy Oversight Board

June 2020

Members of the Board

Member	Affiliation
<i>Secretary Curtis M. Wood, Chair</i>	Executive Office of Technology Services and Security
<i>Deputy Chief Alicia Rebello-Pradas</i>	Office of the Attorney General
<i>Honorable Paula M. Carey</i>	Executive Office of the Trial Court
<i>General Counsel Susan Terrey</i>	Executive Office of Public Safety and Security
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<i>Robert Harnais</i>	Massachusetts Bar Association
<i>Rahsaan D. Hall</i>	American Civil Liberties Union of Massachusetts
<i>Brook Hopkins</i>	Criminal Justice Policy Program, Harvard Law School (appointed expert in addressing racial, ethnic, gender, or age bias)
<i>Dr. Rhiana Kohl</i>	Department of Correction (appointed expert in data collection and analysis)
<i>Gina Papagiorgakis</i>	Executive Office of Public Safety and Security Office of Grants and Research (appointed expert in data collection and analysis)

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1. Introduction

The Justice Reinvestment Policy Oversight Board (the “Board”) was created in April 2018 with the passage into law of Chapter 69 of the Acts of 2018, [“An Act Relative to Criminal Justice Reform.”](#) The Board, chaired by the Secretary of the Executive Office of Technology Services and Security (EOTSS) and comprised of a broad spectrum of criminal justice agency heads and stakeholders inside and outside of state government, is charged with monitoring the development and implementation of justice reinvestment policies relative to the collection, standardization, and public availability of data to ensure they achieve anticipated goals.

The legislation requires the Board to file a report with the clerks of the Massachusetts House of Representatives and the Senate annually by July 1 that reviews the compliance of the criminal justice agencies and the Trial Court, including the Probation Service, the Parole Board, the Executive Office of Public Safety and Security (EOPSS), the Department of Correction, houses of correction, and county jails, with:

1. Collecting and submitting to EOPSS data required by section 18 3/4 of chapter 6A of the Massachusetts General Laws in the form of a cross-agency tracking system that uses a unique state identification number assigned to each person who enters the criminal justice system;
2. Making said data available to the public through the use of an application programming interface (API), as required by paragraph (12) of section 18 3/4;
3. Establishing data collection and reporting standards relative to recidivism rates for re-arrest, reconviction, and reincarceration; and
4. Establishing data collection and reporting standards for reporting race and ethnicity data and policies that ensure accurate data collection across racial, ethnic, and gender classifications.

This is the Board’s second annual report and will primarily address the progress made towards compliance with M.G.L. c. 6A, § 18 3/4 since the previous report.

The Board convened four times in 2020 and continued its work to research, describe, and identify the current landscape with respect to data collection and reporting across criminal justice agencies, the purpose of which is to aid the Executive Office of Public Safety and Security (EOPSS) in the development and implementation of new data standards. EOPSS shared draft regulations with the Board in May.

The following sections present the Board’s findings in each of the four areas listed above. The final section presents recommendations and additional considerations raised by the Board.

2. Data Collection Required by Section 18 3/4

Paragraph (12) of section 18 3/4 of chapter 6A of the Massachusetts General Laws mandates the collection of at least seventeen (17) distinct categories of data by criminal justice agencies and the Trial Court, including but not necessarily limited to: (1) a unique statewide identification number assigned to each person who enters the criminal justice system; (2) the offense for which the person has been incarcerated; (3-4) the date and time of the offense; (5) the location of the offense; (6-9) the race, ethnicity, gender, and age of the person; (10) whether the person is the primary caretaker of a child; (11) the status of the person's reproductive health needs; (12-13) risk and needs assessment scores; (14-15) participation in and completion of evidence-based programs; and (16-17) entry and exit/release dates from a jail or house of correction.

The paragraph further mandates that data shall be collected in the form of a cross-tracking system that tracks individuals through the use of the unique statewide identification number. At present, while some integration across criminal justice information systems has been achieved, no such cross-tracking system, as envisioned by this legislation, has yet been developed.

The Board's June 28, 2019 report to the Legislature highlighted two surveys of criminal justice agencies and the Trial Court conducted to better understand which of the mandated data elements each agency collects presently, by what methods, and in what forms.

At the time the report was submitted, the Board had received eighteen (18) survey responses from the Trial Court, Department of Correction, Parole Board, Probation Service, Committee for Public Counsel Services, and thirteen sheriffs' departments.¹ Over the course of this past fiscal year, the Attorney General's Office (AGO)² and six Offices of the District Attorney (DAs) also submitted responses to the surveys.³ Figure 1 lists these additional respondents.

Figure 1: Survey Respondents

- Attorney General's Office
- Offices of the District Attorney:
 - Berkshire
 - Middlesex
 - Norfolk
 - Northwestern
 - Suffolk
 - Worcester³

¹ Nantucket is the only Sheriff not represented in the survey because Nantucket's data is housed in Barnstable. The Suffolk Sheriff submitted two responses: one from the Nashua St. Jail and one from the South Bay House of Correction.

² Survey responses for the AGO are for the Criminal Bureau only.

³ The Worcester District Attorney's Office responded only to the second of the two surveys and therefore did not provide information about the data categories that office collects.

The following are the findings for each of the data categories surveyed for the **Offices listed in Figure 1 (above)**:

Unique statewide identification number. Not all agencies are using a unique statewide identification number that would allow individuals to be tracked through and across the criminal justice system.

- Full implementation of a consistent, unique identification (ID) number assigned to each individual is paramount to the development of the cross-tracking system for data collection contemplated in paragraph (12) of section 18 3/4 of M.G.L. chapter 6A.
- There are two primary types of unique IDs in the Massachusetts criminal justice system: the fingerprint-based ID (commonly referred to as the State Identification Number – SID) and the non-fingerprint-supported probation central file number (PCF). Of the six agencies who submitted surveys this year, the AGO does not collect a unique identification number, while the DAs all report sometimes collecting a unique identification number. When they do collect a unique ID, three DAs collect both the SID and the PCF, while one collects only the PCF and one a driver’s license number.
- Not all bookings are presently reported to the Massachusetts State Police (MSP) State Identification Section, the central repository for fingerprint-based ID numbers, and even when bookings are reported, some agencies do not appear to record the fingerprint-based ID numbers returned by the MSP in their own records management systems.⁴

Type, date, time, and location of the offense. More thought is needed to determine how offenses should be incorporated into the cross-tracking data system. While all of the agencies surveyed record this information, most report receiving most or all of the information from other agencies, like police departments, and that the content and format of the information varies across the agencies providing it.

- The AGO records the type, date, time, and location of the offense, but receives the information from another agency. Of the DAs, two also receive all of this information from other agencies, while one reports collecting the type of offense and receiving information on the date, time, and location from another agency, and two report collecting the type, date, and location, but receive the time from another agency.
- Two DAs report receiving the location of offense as just the city/town and three as an address, city/town, and zip code. One DA also reports receiving geocodes.
- Several DAs report that time formats vary across police department; time of offense may be reported in standard time or military time.

⁴ The fingerprint-based SID number for each person booked at the DOC, county jail, or house of correction is generated centrally by the Massachusetts State Police as part of the booking process.

Race, Ethnicity, Gender, and Age. Like the offense information, most agencies surveyed report receiving demographic information from another agency or the Trial Court, which raises similar concerns about the consistency of the information collected.

- With the exception of sometimes collecting age, the AGO does not record demographic information in any of these categories.
- Of the DAs, only Middlesex reports collecting these categories. The other DAs report receiving the information for all categories from other agencies, like police departments.
- All of the DAs record gender as male and female only, except one who includes an “unknown” category.

Primary caretaker of a child. Few agencies record information about an individual’s caretaker status.

- Of the agencies surveyed, one reports receiving this information from another agency, one does not know, and the others do not collect or record the information.

Status of reproductive needs. None of the surveyed agencies collect or record this information.

Risk and needs assessment scores. The surveyed agencies generally do not collect or record this information.

- Three agencies report never collecting or recording risk or needs assessments, two do not know, and one collects them sometimes.

Participation in and completion date for evidence-based programs. Responses varied across agencies, likely due to differing interpretations of evidence-based programs.

- The AGO does not collect or record participation or completion of evidence-based programs.
- Three DAs report collecting this information always or sometimes for their own offender diversion programs, while one DA reports receiving the information from another agency or the Trial Court and one reports never collecting the information.

The preceding findings can be summarized as follows:

Some data categories are not collected consistently. Some data categories are not collected by all agencies or are collected by few. Notably, for example, the survey results suggest that not every agency presently collects or records the same unique statewide identification number. Other data categories that do not appear to be consistently collected include primary caretaker of a child, status of reproductive needs, the locations and times of offenses, and participation in and completion of evidence-based programs. Several of these categories are new to this legislation and have not been required in the past.

Identifying definitive data sources will be important to this effort. The volume of information DAs report receiving from police departments, and the variation in the content and format of that information, may suggest the need to expand the scope of the data standardization effort envisioned under M.G.L. c. 6A, § 18 3/4 to include police departments. At the very least, it suggests that attention should be paid to identifying the definitive source for each data category from which data will be provided to the cross-tracking system to improve on data consistency.

Data is not always collected in reportable formats. Even where information is collected, it is not always recorded electronically or in structured ways that lend to straightforward reporting. For example, at least one DA reports receiving information from police department on paper, which may or may not be entered into the DA's electronic system. Information collected on paper, such as where attendance sheets are used to track participation in evidence-based programs, must be made electronic before it can be turned into reportable data. Data recorded in unstructured text fields rather than structured data fields, as is sometimes the case with the time and location of the offense, is difficult to mine for reporting.

3. Progress Reported by the Executive Office of Public Safety and Security

The Board afforded EOPSS the opportunity to provide a section in the report highlighting progress made toward compliance with the requirements articulated in M.G.L. c. 6A, § 18 ¾. EOPSS offers the following summary of their work:

Section 10 of the Criminal Justice Reform Act (CJRA) requires the Executive Office of Public Safety and Security (EOPSS) to work with the Executive Office of Technology Services and Security (EOTSS) to create a data collection and cross-tracking system, including reporting standards, for all criminal justice agencies and the Trial Court. Following the Justice Reinvestment Policy Oversight Board's 2019 Report, EOPSS created an internal working group with key personnel from the Office of Technology and Information Services (OTIS), the Department of Criminal Justice Information Services (DCJIS), and criminal justice agencies including, the Department of Correction (DOC), Parole, and the Massachusetts State Police (MSP).⁵

As this report highlights, there are few standardized definitions for the data points required by Section 10 of the CJRA. Recognizing this, the working group focused on the manner in which various criminal justice agencies define and presently collect the data points required by the statute and the system upgrades that would be required to uniformly collect such data points. The working group utilized the feedback from the data contributors and developed draft data collection regulations. The group met multiple times prior to the COVID-19 pandemic. Thereafter, the working group continued working through teleconferences on a weekly basis.

Undersecretary of Forensic Services and Technology, Kerry Collins, presented to the Justice Reinvestment Policy Oversight Board on behalf of the working group on May 19, 2020 and June 3, 2020. At the May meeting, Undersecretary Collins provided an overview of the group's approach to the data regulations

⁵ The Trial Court and Probation were not among those offices or agencies represented in the working group, as the working group was internal to agencies overseen by EOPSS.

and cross tracking system as well as an update as to the progress the group has made. Following the May meeting, EOPSS circulated the draft regulations to the members of the Justice Reinvestment Policy Oversight Board for their feedback. At the June meeting, Undersecretary Collins reviewed the draft regulations with the Board, welcoming feedback from the members. This feedback, like that of the data contributors, is critical to ensure that the regulations effectively carry out the mission of the CJRA across all agencies.

As of the date of this report, EOPSS is awaiting feedback to finalize its draft regulations. EOPSS expects the final regulations to be promulgated in early Fall of 2020 and will continue to attend and participate in Board meetings.

4. Public Availability of Data

Paragraph (12) of section 18 3/4 of M.G.L. chapter 6A requires that de-identified data from the cross-tracking system be made publicly available through an application programming interface (API) that allows access to “all electronically available records.”

Though the cross-tracking system is in the early stages of planning, and no data is presently made publicly available through an API, the Board recognizes the strides criminal justice agencies and the Trial Court have made in recent years to make data more accessible to the public through online reports, data sites, and dashboards. Prominent examples include:

1. **The Department of Correction** currently publishes dashboards for admissions, releases, release to the community and a January 1st snapshot of inmate data. To provide more current and detailed data, this summer the DOC will be posting additional dashboards displaying Ten-Year Trends and January 1st snapshots as well as rolling Monthly inmate profile dashboards; Ten-Year Trend and Rolling Monthly Admission, Release and Snapshot dashboards and a weekly Institutional inmate count dashboard will be available for public access. While the Department of Correction’s dashboards provide aggregated statistics, not individualized records, and the data cannot be downloaded for independent analysis, each dashboard provides the public viewer multiple drill down features and tool-tips that allows the user to obtain finer detail inmate data while still balancing public reporting goals against data privacy concerns. The DOC provides the greatest level of detail via the filters while still protecting the privacy of identifiable inmate information.
2. **The Trial Court** publishes dashboards that track charges, substance abuse case filings, and harassment and restraining order filings by county, court type, and division, and also publishes statistical reports on mass.gov.
3. **The Parole Board** produces an annual statistical report with data on hearings, votes, and releases.

The Board notes, however, that the data made available through these efforts is in the form of aggregated statistics, not individualized records, and that the data powering the dashboards cannot be downloaded for independent analysis.

5. Recidivism: Collection and Reporting Standards

Paragraph (13) of section 18 3/4 of M.G.L. chapter 6A requires the Secretary of EOPSS to “establish data collection and reporting standards for criminal justice agencies and Trial Court relative to recidivism rates for re-arraignment, reconviction, and reincarceration.” Data is to be tracked over 1, 2, and 3-year periods, include categorizations by race, ethnicity, gender, and age, be reported to EOPSS by relevant criminal justice agencies, and be published quarterly on the EOPSS website.

Presently, some of this data is available through the Department of Correction, which publishes annual technical reports on its website of one- and three-year reincarceration rates, broken out by race, age, and gender. Data for re-arraignment and reconviction are not currently available, nor have standard definitions or calculation methods been implemented for determining re-arraignment, reconviction, or reincarceration rates.

6. Race, Ethnicity, and Gender: Collection and Reporting Standards

Paragraph (14) of section 18 3/4 of M.G.L. chapter 6A requires the Secretary of EOPSS to “establish data and collection and reporting standards for criminal justice agencies and the Trial Court to standardize methods of reporting of race and ethnicity data to facilitate assessment of the racial and ethnic composition of the criminal justice population of the Commonwealth.” Criminal justice agencies and the Trial Court are further required to coordinate to ensure that “racial and ethnic data related to populations, trends, and outcomes is reported accurately” to the Secretary of EOPSS.

There continue to be no consistently employed standards in place for collecting race, ethnicity, or gender data across Massachusetts criminal justice agencies and the Trial Court:

1. While all agencies and the Trial Court use some version of the NCIC race designations, they do not necessarily use the same version; there is no centralized guidance for agencies to rely upon to update their systems when new versions of federally determined race designations are released.
2. There is little consistency in how agencies and the Trial Court collect ethnicity data. Some do not collect ethnicity separately from race; some use the NCIC designations Hispanic and non-Hispanic or another categorization; and others use custom designations ranging in number from 21 to 190.
3. Of the agencies and the Trial Court (which oversees the Probation Service) for which information was made available to the Board—Committee for Public Counsel Services (CPCS), Department of Correction, Parole Board, Probation Service, and Trial Court, and the Sheriffs, only five include gender designations other than male and female. The Department of Correction uses male, female, other, while the CPCS uses male, female, non- binary, transgender male, transgender female. Three Sheriffs—Berkshire, Hampden, and

Worcester—use additional designations, while one DA includes a category for “unknown”.

4. There is presently no coordination among criminal justice agencies or with the Trial Court with regards to reporting race and ethnicity data.

7. Recommendations and Considerations of the Board

The Board’s recommendations remain largely the same as articulated in the previous year’s report (Appendix B). However, the Board is interested in the following additional considerations as it pertains to the requirements of Chapter 69 of the Acts of 2018:

1. The Board is interested in seeing regulations promulgated, pursuant to Chapter 69 of the Acts of 2018, in early FY2021. The regulations should include input from, and represent the role played by, both custodial and non-custodial criminal justice agencies, such as the District Attorney’s Offices and local police departments.
2. The Board recommends EOPSS continues to provide an update on progress made toward developing and deploying the cross-tracking system required by paragraph (12)(ii) of section 18 3/4 of M.G.L. chapter 6A. Consideration should be given to the following action items:
 - (a) Developing an integrated project plan that can be shared with the Board. Said project plan should incorporate the timelines associated with both the successful promulgation and implementation of the required regulations and the development and deployment of the cross-tracking system.
 - (b) Within said project plan, establish measurable benchmarks and metrics that will allow the Board to evaluate project progress more efficiently, and provide an opportunity for the relevant criminal justice agencies and the Trial Court to highlight challenges that limit progress toward compliance.
 - (c) Develop a project implementation budget that outlines the costs associated with implementing said cross-tracking system across all participating agencies, including for necessary interfaces into police departments, district attorneys and the Trial Court data systems, and highlight investment gaps and opportunities where the Board may advocate for funding and assistance.
3. The Board requests a briefing on how EOPSS plans to utilize the funding, included in Governor Baker’s recently released FY21 Capital Investment Plan, that allocates funding for “Criminal Justice Reform – Inmate Data” and “Public Safety Records and Data System Improvements.”
4. The Board requests regular updates from EOPSS as to its plan for making data accessible to the public and/or producing publicly available reports and requests. The Board further requests that EOPSS consider expediting its efforts towards public data reporting by cataloging and publishing available data through a public data ‘portal’ or other reporting tool while progress towards full statutory compliance is ongoing.

Appendix A

Data Collection by Agency

Tables A1. Data Collected by Category: Attorney General and District Attorneys

Key	
✓	Always collects this information
○	Sometimes collects this information
✗	Never collects this information
◆	Receives from another agency

	Attorney General's Office	Berkshire DA	Middlesex DA	Norfolk DA	Northwestern DA	Suffolk DA
<i>Birthdate or Age</i>	○	◆	✓	◆	◆	◆
<i>Gender</i>	✗	◆	✓	◆	◆	✗
<i>Race</i>	✗	◆	✓	◆	◆	◆
<i>Ethnicity</i>	✗	◆	✓	◆	◆	◆
<i>Primary Caretaker of a Child</i>	✗	✗	Don't know	◆	✗	✗
<i>Status of Reproductive Needs</i>	✗	✗	✗	✗	✗	✗
<i>Unique State ID No.</i>	✗	○	○	○	○	○
<i>Type of State ID No.</i>	NA	Driver's License	Probation	Fingerprint Probation	Fingerprint Probation	Fingerprint Probation

I. About Assessments and Evidence-Based Programs (EBP)

	Attorney General's Office	Berkshire DA	Middlesex DA	Norfolk DA	Northwestern DA	Suffolk DA
<i>Risk Assessment Scores</i>	✗	✗	Don't know	Don't know	✗	○
<i>Needs Assessment Scores</i>	✗	✗	Don't know	Don't know	✗	○
<i>Participation in EBP</i>	✗	○	✓	✓	◆	✗
<i>Completion Date for EBP</i>	✗	◆	✓	✓	○	✗

II. About Offenses

	Attorney General's Office	Berkshire DA	Middlesex DA	Norfolk DA	Northwestern DA	Suffolk DA
<i>Offense of Incarceration</i>	◆	◆	✓	✓	✓	◆
<i>Location of the Offense</i>	◆	◆	✓	◆	✓	◆
<i>Date of the Offense</i>	◆	◆	✓	◆	✓	◆
<i>Time of the Offense</i>	◆	◆	◆	◆	◆	◆

Appendix B

Justice Reinvestment Policy Oversight Board Recommendations

2019

The Board raises the following recommendations and considerations in addition to its evaluation of criminal justice agencies' compliance with the requirements of Chapter 69 of the Acts of 2018:

- The legislation sets requirements but not limitations for data collection and reporting; some extensions may be warranted.
 - While the legislation focuses on measuring and reporting on the characteristics of the individuals who come through the criminal justice system, conscious consideration should also be paid to measuring and reporting on incarcerated individuals and their outcomes after incarceration so that policies and programs may be evaluated against outcomes.
 - The data collection mandated in the legislation focuses on the offense of incarceration, but the offense of incarceration may differ from the offense at arrest. Tracking the offense charged at arrest and the offense for which an individual is convicted as separate data fields is important to understanding how the system operates and how it produces particular outcomes for particular individuals.
 - Individuals often wait for extended periods in a pretrial status; pretrial data should be incorporated into the collection mandates.
 - To better our understanding of equity in the system, bail opportunity and amount should be a part of the data collection and reporting process.

- The legislation mandates outcomes, but consideration should also be paid to goals and processes.
 - It is important to think through how the data will ultimately be used to track program effectiveness and other objectives and create the cross-tracking system with those goals and measures in mind.
 - It is also important to think through how the public expects to engage

with the data and to open up for public comment the process of developing data standards and a cross-tracking system in order to deliver a product that will be useful and used.

- Even where agencies report that they *always* collect data, such as race, there are considerable issues with missing data. Consideration should be paid not only to ensuring accurate data collection but also to ensuring complete data collection. This may require changes not just to data standards, but also to collection practices and processes.
- In order to improve data collection, categories causing confusion should be more precisely defined.
 - Two categories in particular—primary caretaker of a child and the status of reproductive needs—caused confusion across agencies. Ensuring that the intended meaning and use of these terms are properly communicated to participating agencies is the first step in planning for the collection of this data.
- A strong effort should be made to include all agencies in the justice system in the data collection and standardization process, including EOPSS agencies, police departments, the Massachusetts Probation Service, the Trial Court, Sheriffs, Offices of the District Attorneys, and the Committee for Public Counsel Services.
- Moving towards a cross-tracking system will require determining which agencies will contribute which data and prioritizing the systemwide collection of the unique state identification number.
 - Achieving a viable cross-tracking system does not necessarily require that every agency collect or contribute data in all of the required categories, only that complete and accurate coverage is achieved when the data is brought together. More thought and focus on data origins and overlap will be required during the planning and development of the cross-tracking system to reduce noise and redundancy and foster accuracy.
 - Because the creation of a viable cross-tracking system hinges on the ability to track individuals accurately, prioritizing the uniform and universal use of the unique statewide identification number is advisable.
- As the cross-tracking system is developed, appropriate privacy standards and security protocols must be adopted to protect individuals' personally identifiable information (PII), as required by law. These standards should include protections against the unauthorized or unlawful use of PII and extend to data storage, processing, and reporting.
- Improving data standardization will hinge on adopting general data standards to

ensure data is uniformly formatted and category-specific data designations that cross agencies and limit missing data (or standardized methods for mapping across designations). These changes should be accompanied by written guidance to ensure that standards are followed over time and that changes are uniformly adopted.

- General standards for how to format dates, times, addresses (location), and other common inputs should be considered and applied in cases where data formatting hinders cross-tracking.
 - A successful data designation system (e.g. race) will be comparable across agencies but also flexible or comprehensive enough to limit the risk of missing data that occurs when individuals do not identify themselves within existing designations.
 - Centralized adoption requirements and guidance should be developed to move agencies en masse to new versions of designation systems when they are released.
 - A centralized process should be developed for agencies looking to make changes existing designations so that the reasons and implications can be understood and any necessary changes to the cross-tracking system can be fully considered.
 - Adoption requirements for new data standards should include guidance for treating historical data. Any necessary retroactive changes to historical data should also be articulated clearly during the planning process and reflected in cost estimates.
 - Race, ethnicity, gender, and other demographic indicators are not unique to the criminal justice system. It is important to implement data standards for common data categories statewide.
- Improving on data reportability will require adopting structured fields for necessary data categories and moving paper tracking processes to digital systems.
 - Data housed in unstructured text fields should be moved to structured data fields that can be built into digital reports.
 - Pre-defined, structured measures should be developed for information kept on paper, like program attendance, for example, and moved into digital systems. Efforts should begin as early as possible to estimate the costs of implementing any changes to data standards and collection and to ensure that participating agencies are adequately resourced and supported to undertake this work.