



Women & Incarceration Project  
Center for Women's Health & Human Rights  
Suffolk University  
sites.suffolk.edu/wiproject

January 20, 2026

Dear Senator Brownsberger and Representative Hunt,

Thank you for your work chairing the Special Commission on Correctional Consolidation and Collaboration. Together with colleagues of the Women and Incarceration Project, I have carried out substantial research regarding security classification of women in Massachusetts. That report is available here: [Women and Security Classification in Massachusetts](#).

As you suggested at the end of the hearing on classification, I am sharing with you questions and concerns regarding the classification process. The hearing raised a number of concerns that we'd like to share with you.

1. **Widespread over-classification is the clear finding presented by the UMass team as well as by our report ([Women and Security Classification in Massachusetts](#)).** While the UMass study used data from 2019-2022 and the WIP used 2024 data, the trends were the same.
2. The majority of Objective Point Based System scores are overridden to higher security levels. This raises the question **why the Commonwealth is using an assessment tool (Objective Point Based System) that needs to be modified in more than half of cases.**
3. While women were not discussed at the hearing, our report raises serious concerns regarding women in the classification system. **The percentage of overrides among women is approximately 80% - almost all from minimum to medium. The reason for this is that the DOC does not currently operate a minimum security women's prison.**
  - a. **At this time, when the State is poised to spend at least \$360 million on a new MEDIUM security women's prison, the issue of classification could not be more relevant. It is fiscally prudent and socially responsible to halt that spending and instead invest in lower security and community based facilities and programs for women, especially given the extremely low rates of violence and zero rate of attempted flight among incarcerated women at MCI-Framingham.**
4. A disproportionate amount of attention is placed on so-called "discretionary overrides" which make up smaller numbers than non-discretionary overrides (also called "restrictions"). **The distinction between discretionary and non-discretionary overrides is somewhat artificial. The Objective Point Based System tool and the override and restriction criteria are at the discretion of the Commissioner of the DOC.**

- a. According to Massachusetts General Law Title XVIII Ch 124, Section 1, Para Q, the Commissioner has the authority to “make and promulgate necessary rules and regulations incident to the exercise of his powers and the performance of his duties including but not limited to rules and regulations regarding nutrition, sanitation, safety, discipline, recreation, religious services, communication and visiting privileges, **classification**, education, training, employment, care, and custody for all persons committed to correctional facilities.”
5. The UMass team found that **the basic classification tool (OPBS) is more accurate BEFORE the overrides, and particularly before the “non-discretionary” overrides, most of which are to higher security levels.**
  - a. We encourage the DOC and the Commission to **review restrictions such as barring people with sentences of 5+ years from minimum security regardless of all other factors** (that is, whether they are assessed as presenting a risk for violent or problematic behavior in the institution).
  - b. Similarly, **barring people with certain medical or mental health needs from lower security settings needlessly keeps people in medium security**, which is not only discriminatory but also expensive. For more on this matter see [Women and Security Classification in Massachusetts](#), esp.p. 8.
6. The UMass team suggested that the fact that **“only” 15% of people received discretionary overrides indicates that there is no racism.** This statement is problematic. First, **15% of 7000 people is a substantial number.** Second, we did not see data on the races of people whose overrides were to higher vs. lower security settings. And finally, social scientists understand that **racism is structural and institutionalized – it’s not just “discretionary.”**
7. We are concerned that **Code C – civil commitment – is applied to 18% of the total DOC male population and accounts for most of the degradation in accuracy of the risk predictions.** This data point demands closer scrutiny. The 18% number is very high.
  - a. Are these people who should be in treatment facilities rather than prisons but for whom no beds were found? Or are there other reasons? The data point alone raises concerns about discrimination against people with mental health and substance use disorder conditions.
8. Several members of the Commission noted that the current prison population is more challenging than was the case ten years ago or compared to other states. That is not reflected in the data.. To the contrary, the **low rate of violent misconduct (5% over a three year period)** reported by the UMass team suggests there are many people who could manage quite well in lower classification settings.
  - a. It is **incumbent upon the Commission to ask for hard data rather than subjective comments regarding the claim that current prisoners are more difficult than in the past.**
9. It was mentioned at the hearing that some people may prefer to stay in medium security because there are more programs offered than in minimum security. However, **this is not justification for over-classification.** Rather, it’s an indication that **the DOC is not providing adequate programming in minimum security prisons.**

- a. Incarcerated people know that they need to show parole boards evidence that they have participated in many programs. Perhaps the DOC should ensure that sufficient programs are made available in minimum security prisons.
10. Senator Brownsberger asked how the security level of the institution impacts individual misconduct. We review some of the studies in our [report](#) (p. 7), and they indicate rather different findings than mentioned by the UMass team. The research shows that **people who are released from lower level security have lower recidivism rates.**
- a. Here are a few highlights: Gaes and Camp (2009) found that prisoners randomly assigned to a higher security level than warranted by their classification scores had a significantly higher rate of returning to prison than those randomly assigned to a lower security level, despite no differences in the institutional serious misconduct rates of these same prisoners. In a landmark study of 1,205 individuals released from federal prisons in 1987, Chen and Shapiro found that “moving an inmate over a cutoff that increases his assigned security level from minimum to above-minimum security tends to increase his likelihood of rearrest following release” (2007, p. 3). See [Women and Security Classification in Massachusetts](#) esp. p. 7 for more on this issue.

We hope these comments will be helpful as the Commission continues its important work. My colleagues and I would be happy to meet with the Co-Chairs and other Committee members to review these concerns and provide our detailed research on women.

Best regards,

Susan Sered, PhD  
Professor, Department of Sociology and Criminal Justice  
Suffolk University, Boston, MA 02108  
[Women and Incarceration Project](#)  
ssered@suffolk.edu