

## The Annie E. Casey Foundation's Juvenile Detention Alternatives Initiative Data Analysis: Data Capacity Assessment

In March 2008, the Governor's Juvenile Justice Advisory Committee (GJJAC) contracted with the Washington State Center for Court Research (WSCCR), the research section of the Administrative Office of the Courts (AOC), to perform an evaluation, make recommendations, provide technical assistance, and conduct analyses of the Juvenile Detention Alternative Initiative (JDAI) in Washington State. Juvenile courts participating in JDAI are King, Pierce, Spokane, Whatcom, and Benton/Franklin.

This is an extensive study and this report is the first in a series. The data capacity assessment describes the sites' 1) JDAI data collection efforts, 2) analysis of JDAI data, and 3) production of JDAI-related reports. The next WSCCR report on JDAI will contain recommendations for a common set of standards for data collection, analysis and reporting. The final report, to describe the results of efforts to reconcile the sites' data collection and reporting approaches, is anticipated to be completed by February 2009.

### Background

The Annie E. Casey Foundation (Casey) pursues a variety of activities intended to more effectively meet the needs of today's vulnerable children and families.<sup>1</sup> Launched in 1992, JDAI is a Casey Foundation program that focuses on the detention component of juvenile justice. The objective of JDAI is to reduce the unnecessary detention of juveniles. The goals of the initiative are to:

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<sup>1</sup> Information available on May 20, 2008 from <http://www.aecf.org>

### Summary

In March 2008, the Governor's Juvenile Justice Advisory Committee contracted with the Washington State Center for Court Research to 1) perform an evaluation, 2) make recommendations, 3) provide technical assistance, and 4) conduct analyses of the Annie E. Casey Foundation's Juvenile Detention Alternative Initiative in Washington State. Juvenile courts in King, Pierce, Spokane, Whatcom, and Benton/Franklin counties participate in the program.

This report is the first of three to be released between June 2008 and February 2009. This data capacity assessment describes the data collected, analysis performed, and reports produced at each of the JDAI sites. The objectives of the report series are to:

- Assess the current data capacity at each of the five sites with regard to quality and accuracy of analysis and reporting.
- Recommend a common set of standards to increase consistency across sites.
- Demonstrate the adopted standards for data collection, analysis and reporting.

Each site currently collects, analyzes, and reports JDAI data in an internally reliable manner that generally conforms to JDAI reporting requirements. Yet details of data collection, analysis, and reporting differ from site to site, making comparisons between JDAI sites problematic. However, the sites' procedures can be reconciled to produce reports that are comparable across sites. The quality and availability of the data at each JDAI site permit reconciling the definitions and analysis used for reporting while continuing to satisfy Casey Foundation requirements.

1. Reduce the reliance on secure confinement.
2. Improve public safety.
3. Reduce racial disparities and bias.
4. Save taxpayers' dollars.
5. Stimulate overall juvenile justice reforms.

JDAI currently has a national representation of approximately 100 sites across 22 states and the District of Columbia.<sup>2</sup>

GJJAC selected JDAI as a model for best-practices outcomes and, with a grant from the Casey Foundation, King, Pierce, Spokane, and Whatcom counties began implementing JDAI in 2004. Benton/Franklin counties joined the initiative in July 2007. These counties represent approximately one-half of Washington State's youth population aged 10-17 and account for approximately one-half of Washington's juvenile referrals.<sup>3</sup> GJJAC administers JDAI in Washington State through a project coordinator. GJJAC sought an agent to evaluate and assist the data collection, analysis, and reporting for JDAI in Washington State and contracted with WSSCR in March 2008.

WSSCR is the research arm of the AOC and was established in 2004 by order of the Washington State Supreme Court. The WSSCR conducts research to improve the understanding of the courts, help guide judicial policy, and improve the functioning of the judicial system.

## Study Objectives

During the spring of 2008, data, documentation, definitions, and calculations were collected from the JDAI sites, the JDAI statewide coordinator, and the JDAI Help Desk. These materials will be evaluated in reference to each JDAI site, in comparison with the other Washington JDAI courts and non-JDAI courts, and at the State level. In particular, this study aims to:

- Assess the current data capacity at each of the five sites with regard to the quality and capability of available data and accuracy of analysis and reporting.
- Recommend a common set of standards in data collection, analysis, and reporting to increase consistency across sites.
- Demonstrate the adopted standards for data collection, analysis, and reporting using data from each site.

## Required Reports and JDAI Documentation

The Casey Foundation publishes a set of JDAI report templates and definitions as part of the starter kit of resources available to JDAI sites on the JDAI Help Desk website.<sup>4</sup> This documentation was created so that definitions and report templates will be used for the site assessment work and to guide quarterly reporting to the Casey Foundation. The instructions allow for the modification of definitions (provided that modifications are properly annotated) due to the limitations within sites and differing needs across them.

Casey requires JDAI sites to produce four quarterly reports: Detention Population, Referrals Screened, Overrides, and Alternative Programs. These reports include summary statistics on the demographics of detention and alternative programming populations, programming and detention duration, offense pattern, and the performance characteristics and administrative decisions linked to the Risk Assessment Instrument (RAI).

### Detention Population Report

The Detention Population Report counts population at the beginning and end of each quarter, the admissions and releases, the average length of stay, and average daily population. These indicators are also reported by gender, race, and offense categorization.

<sup>2</sup> Information available on May 20, 2008 from <http://www.aecf.org/Home/MajorInitiatives/JuvenileDetentionAlternativesInitiative.aspx>

<sup>3</sup> Information available on May 20, 2008 from <http://www.dshs.wa.gov/ojj/JDAI.shtml>

<sup>4</sup> <http://www.jdaihelpdesk.org/Pages/Default.aspx>

## Referrals Screened Report

Each site employs a Risk Assessment Instrument (RAI), or screening instrument, that helps with the decision of whether a youth is released, released with conditions that typically include some alternative to detention, or detained. The Referrals Screened Report counts and summarizes RAI activity for the quarter. Since the RAI involves the calculation of a risk score, and the administrative decision of whether to release, release with conditions, or detain is based in part upon that score, counts are tabulated by offender demographics for each score range and for each admission decision.

## Overrides Report

The Overrides Report is also based upon the RAI and details administrative decisions 1) coinciding with or 2) departing from the recommendation produced by the RAI risk score calculated. "Overrides Up" corresponds to a decision more serious than the risk score would recommend, and an "Override Down" indicates a decision that is less serious. "No Override" is when the decision coincides with the recommendation from the RAI. The override indicators can be reflective of special detentions, or policy decisions, where local policy guides the detention decision under specific circumstances..

## Alternative Programs Report

The Alternative Programs Report is similar to the Detention Population Report in that it counts population at the beginning and end of each quarter, the entries and exits to the programs, and the average daily population. The Casey Foundation also requires the tracking of Failure to Appear (FTA) and Re-offense exits from the programs, and total capacity. These totals are disaggregated by program type, as well as gender and race.

## Research Design

The first step in the JDAI data analysis project consists of an assessment of the data, analysis, and reporting from each site. The next steps will be to make recommendations for improvements based upon this assessment, demonstrate and work with sites to

implement these improvements, and report on the outcomes.

The assessment component of the data analysis project includes an evaluation of each site to determine the quality of the data, the extent of the available records history for analysis, and the accuracy of the analysis. This assessment will then compare and describe the degree to which the current site reports meet Casey Foundation requirements. Finally, this assessment compares data definitions and approaches to analyses to find commonalities and document differences in reporting across the JDAI sites.

The assessment component of this data analysis project requires review of the most recent JDAI quarterly site reports sent to the Casey Foundation, documentation of analysis performed by each site in the production of the reports, and review of the database records at their most detailed level. These resources are necessary to evaluate properly the quality of data, the extent of the available record history for analysis, the accuracy of the analysis, and reporting of outcomes. Data, documentation, definitions, and calculations were collected through site visits, questionnaires, and other contact with court staff at the JDAI sites.

## The Assessment

### About the Data Sources

Each Washington State JDAI site collects its own detention population, RAI, and alternative program data and stores this data at the local level in independent systems. Individual components of this data may be stored in separate local database systems. The primary database systems are: JJWEB, King County; JUDI, Pierce County; Detention/EM Database, Spokane County; Rite Track, Whatcom County; and Juvenile Tracking System (JTS), Benton/Franklin Counties.

These database systems serve as the principal source of data for the production of JDAI quarterly

reports and, with the exception of Spokane, reports are produced exclusively with site data.<sup>5</sup>

King, Pierce, Spokane and Whatcom counties began implementation of JDAI in 2004. With the exception of Benton/Franklin counties, which began implementation in July 2007, each site produces all four required JDAI quarterly reports. Implementation is ongoing in Benton/Franklin counties and currently the detention population quarterly report is produced.

### **Data Availability**

The five JDAI sites each have a record history available for analysis that extends backward between 3 and 10 or more years.<sup>6</sup> Accounting for the different implementation start times, this corresponds approximately to a range of 2 to 10 or more years of available pre-JDAI history and 1 to 4 years of post-JDAI data for analysis.<sup>7</sup> Records are also available from various AOC statewide data systems for most of the JDAI sites as an alternative or supplement. In some cases, this available statewide data extends the available site history by several years.

The detention population data has the most extensive available history. At certain sites, this is due to the later adoption of RAIs and alternative programs. For most sites, the available history of alternative program data is as extensive as that of the detention population; however, there are tendencies for the addition of new alternative programs over time and current site programs have various durations. There are additional considerations with RAIs since in some cases the particular instrument, the thresholds for action, or the administrative overrides have changed over time.

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<sup>5</sup> Spokane supplements records with race, gender and individual information from the AOC's Juvenile and Corrections System (JCS) and Judicial Information System (JIS).

<sup>6</sup> For electronic records. Hard copy records can extend additional years into the past.

<sup>7</sup> King County informally began implementing JDAI strategies in 1998, prior to formal JDAI implementation in 2004.

Within these data sets older records often have a smaller set of available detail than more recent records. This limits the extent or scope of certain comparisons of pre- and post-JDAI indicators. With regard to the Casey Foundation's reporting requirements, the indicators of greatest research interest are supported by site histories extensive enough to produce pre- and post-JDAI comparisons.

### **Reliability**

After reviewing available documentation of analysis methods and the reported measures on recent quarterly reports, indications are that the general quality of the unprocessed data—i.e., data at the most detailed level—is high. Direct and detailed review and analysis of the unprocessed data is necessary and will be conducted when full record sets of data are made available from all JDAI sites.

Analysis of this data is critical to the success of this study. Future study objectives depend upon an accurate determination of the reliability of these datasets conducted through a detailed assessment of the full unprocessed data. Future recommendations for the standardization of definitions, analysis, and reporting of measures associated with JDAI are subject to the limitations and permitted by the flexibility inherent in the data from each JDAI sites.

### **Definitions/Categorizations – All Reports**

#### **Exclusions**

The Casey Foundation notes that juveniles detained from sources not participating in JDAI, through contract holds for example, should not be included in the reports. These youth have not passed through the same juvenile justice processes targeted by JDAI at the site and should be excluded for calculations that are used to measure JDAI outcomes. JDAI sites in Washington State appear to be taking steps to report these youth separately. However, the approaches to exclude non-JDAI youth from analysis vary by site. Currently, no site completely excludes these youth from JDAI quarterly reports. Two areas in particular where sites tend not to properly exclude

these youth are the counts and calculations of gender and race.

### **Gender**

The definition of gender is unambiguous and uniform across sites in past reports.

### **Race/Ethnicity**

The Casey Foundation requires the use of the racial categories Black, Hispanic, Asian, White, and Other. Sites generally adhere to a reporting format that satisfies the requirements of the Casey Foundation. However, most sites deviate in some manner from the reporting model as with the inclusion of other racial categorizations such as Multiracial or the inclusion of a category for when the race is Unknown.

Additional categories do not pose an obstacle to reconciling these reports into a common format; e.g. Multiracial can be seen as a subset of Other. When race is Unknown, it is not appropriate to condense Unknown into Other, since Other implies that the race is known and not one of the other delineated races. These are youth that must be included, but a critical piece of data is not known for them, so one possible solution may be the adoption of Unknown as a reported category, albeit one that should be used when all other efforts to recover the data are exhausted. Another course would be to take systematic steps to prevent recording of Unknown as a valid racial categorization. The National Center for Juvenile Justice (NCJJ) has produced a set of guidelines for collecting and reporting that may help mitigate this situation.<sup>8</sup>

NCJJ guidelines, raising another issue concerning race and ethnicity, recommend removing Hispanic as a racial category and including it in a separate question about ethnic identification. The NCJJ guidelines can be reconciled with the Casey

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<sup>8</sup> *Guidelines for Collecting and Recording the Race and Ethnicity of Juveniles in Conjunction with Juvenile Delinquency Disposition Reporting to the Juvenile Court Judges' Commission*, NCJJ, 2006.

Foundation's JDAI reporting Template. The racial categorizations required for JDAI encompass the categories recommended by the NCJJ; the NCJJ categories can be collapsed into the categories required by the Casey Template. Most JDAI sites already record ethnicity as a separate data field from race and could easily satisfy both NCJJ guidelines and Casey Reporting requirements.

## **Detention Population Report**

### **Offense Category**

The Casey Foundation's report templates and definitions of terms require categorizing youth by their "top", or most serious, offense. The template provides offense categories for general guidelines. This ordering of the offense categories is discussed in greater detail below.

All state JDAI sites aggregate youth into offense categories. The most striking deviation from the template is the tendency of some sites to include subcategories within the main Casey Foundation categories. This added detail does not conflict with Casey Reporting requirements; the additional information can be condensed into the main, Casey-listed categories. With little or no substantive change, the sites' reporting formats can be reconciled to the Casey template.

The determination of the "top" offense, or equivalently, the use of an ordered listing of the categories such that a youth is counted in the highest category that applies regardless of the applicability of other lower categories, is not a trivial decision. During meetings and site visits, issues and reasoning were put forward for different orderings. One consideration is the ordering of juvenile offenses as they are written in the Revised Code of Washington, Juvenile Justice Act of 1977.<sup>9</sup> Another consideration is the latitude in decision making at the time of intake if more than one offense reason exists. An offense reason resulting in a mandatory detention can be argued to be more serious than one not requiring detention.

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<sup>9</sup> RCW 13.40

As noted above, the Casey Foundation template format requires some ordering of the offense categories. Currently, most sites order their reported categories uniquely. While there may not be an ideal ordering, one that satisfies the Casey Foundation requirements and is used by all sites will produce comparable results even if those results are limited by the assumptions under which they were produced.

### **Analysis and Calculations**

There is a wide range of issues and challenges with data analysis inherent to each site. These depend upon the intricacies and the limits of the data. There is some concern with the impact of the categorizations and definitions discussed above on calculations performed.

Generally, Start and End of Period populations, Admissions, and Releases are accurately stated on the JDAI quarterly reports. These records adhere to the Casey Foundation's definitions and satisfy the conditions on timing; e.g., admission dates are counted if they fall between or on the starting and ending dates. There are differences between the sites due to timing issues that may relate to the moment when a record is created for a detention, or the accuracy of recording a time stamp in databases. These differences do not appear substantial, may be inherent to the local data system, and may not easily be eliminated.

### ***Average Length of Stay (ALOS)***

The Casey Foundation provides guidance for the calculation of Average Length of Stay (ALOS) as part of the reporting template. For each release event the length of stay is calculated, subtracting the admission date from the release date. The lengths of stay are summed over all releases in a group, and then divided by the number of releases in that group. Sites appear to calculate the values of ALOS correctly in recent quarterly reports, in accordance with Casey Foundation requirements.

Difficulties arise in the comparison across sites. This is the consequence of youth being detained for

multiple reasons, and the subsequent aggregation of these individuals into one reason category in order to comply with the Casey Foundation reporting requirements. This aggregation poses problems. Consider a youth detained for two reasons, with a portion of the total time spent in detention divided between those reasons. When reporting, if the first reason is in the "top offense" category, then the youth will appear to have spent the total time in detention for the first reason, while spending no time for the second reason. If the second reason is now considered "top", the situation is reversed. **This illustrates the dependence of the reported results on the offense category orderings.** This problem is compounded since each site labels admission reasons according to its own offense category scheme.

This difficulty does not reflect a calculation or analysis problem as much as a standardization problem and a reality of the constraints of the required report format. The Casey Foundation requires the reporting of JDAI results in a report that matches their format. It gives no recommendation on an expected ordering of offense categories other than to ordering them by "top offense," with no further explanation, and notes that categories will differ by site. This has resulted in the lack of standardization of reporting across Washington State JDAI sites. Note that site results are valid while viewed under the specific assumptions that were used to construct them. If viewed in any other regard (e.g., a different ordering), or for any other purpose (e.g., comparisons between sites), they can be very misleading.

It is necessary to construct a uniform set of standards that includes a reasonable ordering of the "top offense" categories. This will comply with the Casey Foundation's reporting requirements and enable comparison across Washington State JDAI sites.

However, standardization will not eliminate the effects of grouping particular offenses into broad categories that are then ranked by seriousness, a condition that erroneously attributes detention time to single, rather than multiple, reasons. This dependence

of the reported results on the offense category orderings, even with a commonly adopted standard order, is a direct consequence of the required format of the Casey Foundation report. Since this reporting format does not satisfy many research needs, it may be reasonable and necessary to expand or create additional reporting formats that better serve site and statewide research requirements.

### ***Average Daily Population (ADP)***

The same comments made for ALOS apply to the calculation of the Average Daily Population (ADP). The Casey Foundation suggests for each day in the reporting period, the number of youth is counted for each group (a census). The census results are summed for all days in the reporting period and then divided by the total number of days to produce the ADP.

This calculation poses additional challenges. Some sites appear to use the census method described above. In this case, the time of the day of censuses may result in different counts, if there are systematic differences connected to the time of day, in detention population. Others use information from release dates and starting dates. Although these methods differ and can produce different results, the difference on average should tend towards insignificance. Regardless, after a more detailed assessment of the unprocessed site data, it may be possible to reconcile the two methods and propose a recommendation on the adoption of one.

### ***Referrals Screened (RAI) Report***

#### ***Intake Decision***

The Casey Foundation template requires that scores generated from RAIs be classified first as Detained, Released, or Released with Conditions. This partition of all intake decisions appears unambiguous for the state JDAI sites. However, reports from different sites differ dramatically in appearance. The combination of the risk assessment tool, the sequence of administrative decision points, policy overrides, and alternative programming contributes to the variety in reporting formats.

### ***Risk Assessment Instrument (RAI) Score***

The three intake decisions are further categorized by the score received on the RAI. The template divides all scores into high, medium, and low score groups. This score group corresponds with the recommendation received from the instrument to detain, release with conditions, or release, respectively. The Casey Foundation notes in the template that there are situations where this may not be applicable. For example, some risk assessments only recommend release and detention. It then falls to Special Detentions, or Policy Overrides, to determine if detention is mandatory or if a release with conditions is possible. Another common trait is the absence of certain score ranges or categories, which may result from court policies that restrict or prohibit options or outcomes that exist at other sites. There are other differences in how sites report these results, but most are due to differences in formatting and convention rather than substantive differences. These differences do not conflict with reporting requirements and it is likely they can be reconciled with Casey Foundation requirements and between JDAI sites.

### ***Overrides Report***

The Overrides Report is essentially a reorganization of the Referrals Screened Report, tabulating the same results relative to a different question. It poses the same issues and can be addressed with similar remedies.

### ***Alternative Programs Report***

The Alternative Programs Report is similar to the Detention Population Report and shares many of the same definitions and categorizations. Unlike the Detention Population Report, the Alternative Program Report does not contain a count of youth according to the most serious offense upon which they entered the program. The report does divide youth into the specific type of program in which they participate. Although the Casey Foundation guides sites to count youth that exit and then re-enter a program during the reporting period as separate episodes, it does not provide guidance for youth participating in several

programs at the same time. This is an issue that requires resolution for statewide comparability.

### ***Failure to Appear/Re-offense***

Most sites currently report Failure to Appear (FTA) and re-offense (re-arrest) rates as part of their quarterly reports. FTA and re-arrest data are obtained from a variety of sources and can be difficult to obtain. These sources may include the primary site data systems and systems external to the Juvenile Court. It is also likely that the confidence in data for certain programs, such as Electronic Monitoring, will be higher than for others.

Re-arrest rates can be particularly difficult to obtain. There is no statewide repository of re-arrest data. The results reported are often a proxy indicator, re-referrals. It is clear that arrests may not always lead to referrals, but referrals are likely to be the best available approximation for arrests.

## **Findings**

### **Current state of data collection, reporting and analysis**

JDAI data is currently collected, analyzed and reported within each Washington State JDAI site in a manner that is both internally reliable and substantially consistent with JDAI reporting requirements. All sites are collecting sufficient detention, alternative, and RAI data to comply with Casey Foundation reporting requirements. Sites that have fully implemented JDAI are currently producing all four quarterly reports that satisfy the requirements. The remaining site is in the process of implementing JDAI, currently produces the Detention Population Report, and is taking substantial steps towards producing all required reports

### **Availability of data to compare before and after JDAI measures**

Each JDAI site has database records that extend prior to the implementation of JDAI. The length of time of this pre-JDAI data varies by site, and the quantity of detail is diminished in older records. Additional data supplied from the AOC statewide

databases may extend and supplement this data for most JDAI sites. There appears to be sufficient history and detail to produce comparisons of the pre- and post-JDAI data at each site, between sites, and statewide.

### **Consistency and standardization in definitions and reporting**

Within individual JDAI sites, the definitions, analysis, and reporting are generally consistent. Minor changes in analysis and reporting are observed from older reports. Recent reports show corrections and improvement in analysis and stabilization in reporting consistency.

Reporting and analysis methods used by the Washington State JDAI sites largely follow JDAI guidelines. Instances where reporting and analysis do not exactly match requirements are generally for good cause, documented, and acceptable under the intentionally broad JDAI template. These variations are primarily due to inconsequential formatting or local practice differences that should be easily reconciled.

The generality of the JDAI template has allowed reporting practices at the JDAI sites to diverge while remaining in compliance with the Casey Foundation reporting requirements. Comparisons of analysis and reporting between JDAI sites that may appear legitimate are in fact misleading and must be reconciled before being considered valid. The data analysis and reporting at each site differs substantially. The ability to reconcile the analyses and reporting is entirely dependent upon the flexibility in definitions and detail of the available data from the JDAI sites. The degree to which the unprocessed data at each of the five sites will support reconciliation between the analyses will be assessed when all datasets are available for comparison.

## **Recommendations**

The quality and availability of the data at each JDAI site are adequate for current reporting requirements. The recommendation is to reconcile the

definitions and calculations used in the reporting process while still meeting the Casey Foundation requirements. It should be noted that the recommendations offered below are not meant to eliminate data collection, analysis, and reporting at the local level that is tailored to meet local needs; such reporting can, and should, continue.

Specific recommendations include the following:

- Exclude, or count separately, youth that do not participate in the JDAI.
- Collapse racial categories to a set that satisfies the Casey Foundations requirements but is sustainable based on the data limitations of each site.
- Subtotal Hispanic youth as an ethnicity, and then include it to match reporting requirements.
- Adopt a set of reported offense categories that is common to all JDAI sites.
- Adopt a standard ordering of offense categories to satisfy reporting requirements and increase comparability.
- Reconcile time data used in ALOS and ADP calculations if supported by site data.
- Reconcile differences in reporting to more closely match the Casey Foundation templates.

## Next Steps

### Continued Assessment

Sites are in the process of making the full databases available to the WSCCR. This data is necessary in this study for a continued evaluation at the most detailed level, and to perform the richest analysis possible. As these databases are made

available, more thorough assessments of reporting accuracy and individual site needs will be possible. When this is accomplished, the research will guide recommendations and serve as the basis for the successful completion of subsequent objectives.

### JDAI Standards Working Group

A JDAI Standards Working Group will meet for this study to provide feedback, guidance, and technical assistance on issues of definitions, analysis, and reporting. The working group will review recommendations and proposals produced by the WSCCR for standardized practices. It is composed of staff members from each of the JDAI sites and the Washington State Coordinator. The participants include: Rand Young, Washington State JDAI coordinator; Michael Gedeon, King County; Ed Vukich, King County; TJ Bohl, Pierce County; Allyson Erickson, Pierce County; Bonnie Bush, Spokane County; Marie Studebaker, Spokane County; Lori Pence, Spokane County; Karen Gehret, Spokane County; Colleen Smith, Spokane County; David Reynolds, Whatcom County; and Eric Lipp, Benton/Franklin Counties.

### Future Reports

The next report will consist of a series of recommendations for a common set of standards for data collection, analysis, and reporting. An interim progress report will include analyses of site data in conjunction with the WSCCR and serve as a demonstration of the adoption of standards for data collection, analysis, and reporting. The final report will summarize the progress towards adopting uniform standards, verify the reliability and accuracy of analysis and reporting, and compare JDAI sites and state wide data. The final report is anticipated to be completed by February 2009.

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