

These comments represent the views of the national organizations and individuals listed below, all of whom represent and serve victims of crimes throughout the nation. We firmly believe that the regulations should keep the focus on victims by affording them the highest priority when it comes to the allocation of inmate resources under the proposed Bureau of Prisons (BOP) regulations, especially when it comes to payment of court-ordered restitution.

While we overall support the proposed rule to revise the Inmate Financial Responsibility Program (IFRP), we believe the rule would strengthen the rights of crime victims by requiring all inmates to participate, rather than retaining the IFRP as a voluntary program. As a voluntary program, inmates with lengthy or life sentences have very little incentive to participate with only a minimal contribution to the debts they owe. At the very least, inmates' financial obligations should be subject to the Treasury Offset Program, including on amounts an inmate may try to send to other persons.

Rather than setting a maximum on the amount that could be collected under the IFRP, we believe a fairer approach would be to establish a minimum threshold (e.g. up to \$250) on the permissible amount that an inmate can retain from community resources (such as inheritances, sales of assets, etc.). This would recognize the concerns of inmate families, particularly lower income families, who fear the rule change would jeopardize the modest amounts they send to incarcerated relatives for necessities.

Improved collection of inmate debts would not only directly benefit crime victims who are owed court-ordered restitution, but would also enhance collection of special assessments under 18 U.S.C. 3013 and criminal fines. These amounts are deposited into the Crime Victims Fund (CVF) from which Victims of Crime Act (VOCA) grants are awarded. These grants financially support state crime victim assistance and state crime victim compensation programs and other services for millions of crime victims every year.

In sum, we support BOP's proposed rule revisions with a few suggestions to make the rule more effective in recognizing the rights of crime victims as it pertains to the Trust Fund Program which offers inmates the opportunity to shield their monetary resources from fully meeting their financial obligations.

National Organization for Victim Assistance (NOVA)

National District Attorneys Association (NDAA)

National Coalition Against Domestic Violence (NCADV)

National Crime Victim Law Institute (NCVLI)

National Children's Alliance

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