



Written Statement of Maria Goellner
Senior Director of State Policy, FAMM
Alabama Board of Pardons and Paroles
Public Comment on Proposed Parole Guidelines
July 2, 2025

Honorable Members of the Alabama Board of Pardons and Paroles:

I write with input on the [proposed parole guidelines](#), and represent many Alabama families who have experienced incarceration. [FAMM](#) is a nonpartisan, nonprofit organization that advocates sentencing and prison policies that are individualized and fair, protect public safety, and preserve families. Many of our families have also suffered harm from crime; including but by no means limited to the crime that occurs daily within the Alabama Department of Corrections (ADOC). The experiences of incarceration and victimization are not mutually exclusive.

Alabama's parole grant rates reached a historic low of 8% in 2023.¹ Though the percentage has increased since, serious concerns remain about the parole guidelines and grant and denial rates. We are grateful for your work to safely increase the parole grant rate in recent years and urge you to significantly expand access to parole. This effort is critical given the state's staggering incarceration rate and abysmal prison conditions, which are negatively affecting incarcerated people, their families, correctional staff, and public safety every day.²

FAMM recommends the following regarding the proposed guidelines.

- Acknowledge that the proposed rules on parole have a *significant* economic impact and therefore should be accompanied by a fiscal note prepared in accordance with subsection (f) of Section 41-22-23, Code of Alabama 1975. ADOC has a \$730 million annual budget, 21,000 incarcerated people in its care, and nearly 3,000 state employees on its payroll.³ The cost of supervision is significantly less than the cost of incarceration. The parole guidelines play a huge role in ADOC's population size. A fiscal note should consider the cost savings if the Parole Board meets its target parole percentage under the proposed guidelines as well as current costs related to the rate of parole today.
- Section II. Actuarial Assessments.
 - The Board should make available online the psychiatric, impulsivity, and/or risk assessment tools used to evaluate people. In addition, these tools should be

¹ Alabama Daily News, "Alabama Parole Board chair grilled by committee over release guidelines, noncompliance," <https://aldailynews.com/alabama-parole-board-chair-grilled-by-committee-over-release-guidelines-noncompliance/>.

² Complaint in *United States of America v. State of Alabama and Alabama Department of Corrections*, <https://www.justice.gov/opa/press-release/file/1344011/download>

³ Biography of John Hamm, Commissioner of the Alabama Department of Corrections, <https://doc.alabama.gov/ExecutiveBios?Name=John%20Hamm>; State of Alabama General Fund Fiscal 2024 Appropriations, <https://budget.alabama.gov/wp-content/uploads/2023/12/GF-APPR-REC-NOV-FY24.pdf>.

assessed independently by outside agencies on a regular basis for bias and accuracy.

- Consider the use of half points in this Section.
- Section III. Institutional Behavior.
 - A person with “0 disciplinaries within the last 12 months” will have zero points added under the proposed guidelines. The Board should deduct points where a person has had zero disciplinaries for longer than 12 months. In looking at the whole picture of a person today, this is an important counterbalance to the seriousness of the offense or other areas where a person may be able to do nothing to reduce their score. Further, the current proposal does not recognize the good behavior and effort put forth by a person to maintain a zero disciplinary history for more than 12 months. Some people have zero disciplinaries for years, even decades.
 - Ensure that incarcerated people have the opportunity to explain misconducts.
 - Ensure that the Board has the opportunity to depart downward for mitigating circumstances.
 - Consider the use of half points in this Section.
- Section IV. Participation in Risk-Reducing Programming/Treatment.
 - Only programs and treatments ordered by the Court, the Board, or recommended by ADOC that are risk-reducing/cognitive behavioral as defined by ADOC are scored. Ensure that this list is regularly updated and broaden the definition of acceptable programming.
 - A person who has completed required programs will have zero points added to their overall score. The Board should deduct points where a person has completed all programs or gone above and beyond in participating in non-required programming. Programming is an important rehabilitative tool. It should deduct numerically from the present risk to public safety and from static factors like seriousness of the offense which a person can do nothing to change.
 - Recognize in the numerical score and the parole process that people are often denied parole because they have not taken a particular program, but many times that is because the waitlist is long or the program is unavailable. It is unfair to penalize people for not taking required programming that they are physically unable to take.
 - Consider the use of half points in this Section.
- Section V. Reentry Plan.
 - A person who has a complete and acceptable reentry plan will have zero points added to their overall score. The Board should deduct points where a person has a good, comprehensive reentry plan. It reduces the present risk to public safety and that should be positively reflected in the numerical score.
 - Consider the use of half points in this Section.
 - Recognize in the numerical score and the parole process that many people do not have complete and acceptable reentry plans because of factors outside of their control. It can be extremely difficult to secure housing and a job without help from the outside. This can be close to impossible when one’s family has passed away, moved, or the individual has been placed in a prison hundreds of miles

- from home. Reentry plans are also impacted by age, medical and mental health, financial position, length of sentence and other factors that cannot be helped.
- Recognize that oftentimes appropriate home plans or rehabilitation facility beds are simply not available in time for parole review. The Board should prioritize quick reconsideration of these applications once space is available.
 - Recognize that ADOC has a duty to assist in creating solid reentry plans. To the extent that this is not occurring, the Board should bring this to light. Social workers can be an immense help in these situations.
- VI. Stakeholder and Community Input.
- If a potential parolee has support, that person will not be assessed any points. If a potential parolee has opposition, they will be assessed up to two points. The Board should not weigh opposition so heavily and should not weigh it more heavily than support. The Board should deduct points where a person has support. Community and individual support for parole reduces the present risk to public safety and should be positively reflected in the numerical score.

Overall, the proposed guidelines represent an extremely reductive scoring system. They add points for negative attributes but never deduct points for positive attributes. The state should move to a more holistic scoring model, *i.e.* one that reduces points for positive attributes in addition to adding points for negative attributes. This simple step will improve accuracy, the budget, and public safety.

We finally ask you to please visit an Alabama prison and continue the practice regularly.⁴ You could gain valuable insight by holding listening sessions about these guidelines throughout the state with incarcerated people who are up for parole or have been through the parole process. They are critical stakeholders, and you will be best positioned to create parole policy after meeting them on these issues.

Please reach out to mgoellner@famm.org to discuss this matter further. Thank you for considering our views.

⁴ FAMM #VisitAPrison campaign, www.visitaprison.org.