considered when relying upon such assessments in parole hearings. Butcher and Kretschmar suggest that risk assessments be used in conjunction with developmentally-appropriate behavioral health, trauma, and resilience data to make more informed decisions.

assessments for youth <u>a recently administered</u> (within six months), reliable and racially equitable the applicable risk assessment tool validated on the appropriate target population

3. Despite the addition of age at offense and diminished culpability of youth, the proposed OAC 5120:1-1-07 does not adequately incorporate an understanding of adolescent development throughout which disadvantages those incarcerated as children or youth.

In addition to the issues raised above, OAC 5120:1-1-07(B)(2)-(5) and (B)(11) as written do not reflect an understanding of adolescent development and how the status of youth impacts consideration of these various factors. Specifically:

- (B)(2)

as a

factor which, in addition to the example of bias in first arrest discussed above, is by definition any person incarcerated during their childhood and