

May 10, 2010

Attorney General Eric H. Holder, Jr.
Department of Justice
950 Pennsylvania Ave. N.W.
Washington, D.C. 20530

RE: Docket No. OAG-131; AG Order No. 3143-2010
National Standards to Prevent, Detect, and Respond to Prison Rape

Dear Attorney General Holder,

The National Association of Evangelicals, representing 40 denominations with more than 45,000 congregations and millions of members, writes to encourage your swift adoption of the standards proposed by the National Prison Rape Elimination Commission. The widespread rape and sexual abuse of prisoners – affecting according to some reports more than 60,000 prisoners per year – is a blight on our nation’s conscience. Every violation is an offense against God and the moral fabric of our society.

Evangelicals have long been concerned for the welfare of prisoners, sponsoring numerous prison ministries, which serve both inmates and ex-offenders. In a 1997 resolution we affirm that “the people of God, whether in prison or free in society, are equal in the sight of our Lord Jesus Christ as we have been saved only by his grace through faith.” In a 1983 resolution we refer to imprisoned believers as “the church-behind-the-walls.” In a 2004 document we further state that “because God created human beings in his image, all people share in the divine dignity.” As God’s image bearers, those behind bars deserve the same protections against violence as those on the outside. Indeed, we bear a special responsibility for the protection of those who have no other recourse. While some prisoners have indeed committed heinous crimes, subjection to rape or sexual abuse must never be part of their punishment.

We have followed the work of the Commission established by the Prison Rape Elimination Act of 2003. Following an exhaustive review and wide consultation with stakeholders, the Commission issued proposed standards that will guide corrections professionals in their important responsibility of protecting prisoners from abuse. Now, the ball is in your court. With an estimated 165 prisoners being subjected to abuse every day – more than 1,000 per week – any further delay is inexcusable.

We understand that some opponents of the regulations argue that our nation cannot afford the cost of protecting prisoners from rape and sexual abuse. While we appreciate and strongly support the need for fiscal discipline in all areas of government spending, we do not accept the premise that maintaining basic standards of human decency is unaffordable. We understand that many of the needed reforms can be accomplished with minimal additional expenditures. Even where substantive additional costs must be incurred, these must be weighed against the costs – moral as well as financial – of inaction. Sexually abused prisoners face even greater obstacles to reintegration in society upon their release. Eliminating prison rape and sexual abuse would certainly lower recidivism rates, leading to substantial cost savings.

We have long advocated for sentencing reform, which would provide for more cost-effective alternatives to incarceration for nonviolent offenders, leading, wherever possible, to restitution for the victims. This would also free up substantial resources to improve protection for those who must be incarcerated.

Thank you for considering our views. Be assured of our continued prayers for you as you fulfill your important responsibilities.

Respectfully,

A handwritten signature in black ink that reads "Leith Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Leith Anderson
President

A handwritten signature in black ink that reads "Galen Carey". The signature is cursive and somewhat stylized, with a large initial "G".

Galen Carey
Director of Government Affairs