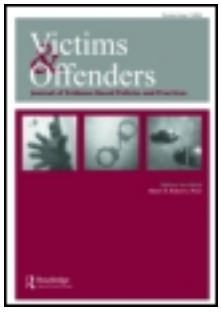

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Reforming Federal Sentencing Guidelines: A Modest Proposal

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Reforming Federal Sentencing Guidelines: A Modest Proposal

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Abstract: This article examines the use of community-based sentencing options within federal sentencing guidelines and offers specific recommendations for expanding the use of these sanctions. We begin by describing how the types of offenders and types of crimes prosecuted in our federal court system have changed since the passage of the Sentencing Reform Act of 1984. We then examine how various types of alternative sanctions—probation, probation and confinement, and prison/community split sentences—are currently being used in conjunction with federal sentencing guidelines in the sentencing of this new generation of federal offenders. We consider the issue of whether specific changes in sentencing guidelines are needed to increase the use of alternative sanctions and reduce post-*Booker* guideline departures. We conclude by estimating the impact of both sentencing guidelines reform and community-based program reform on public safety and the cost of corrections.

Keywords: federal sentencing guidelines, alternative sanctions, Booker decision, Blakely decision, public safety, sentencing reform

INTRODUCTION

The American Society of Criminology (ASC) has certainly not been silent in the areas of both sentencing reform and corrections reform. In 1989, for example, ASC's executive board released a review calling for the abolition of the death penalty in this country. During the past two decades, members of ASC have been active in the areas of both sentencing reform and corrections reform, drawing on their research on such topics as the effectiveness of prison

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and community-based sanctions, the impact of mandatory sentencing, racial disparities in the sentencing of federal and state offenders (particularly for drug law violations), and the negative consequences of incarceration on both offenders and communities. Since its inception a decade ago, ASC's Division on Corrections and Sentencing has offered a much-needed forum for the examination of our current sentencing and corrections research, policy, and practice. In the following article, we highlight current thinking about one of the most important issues facing federal lawmakers today—the need to reform federal sentencing guidelines, given what we know about the effectiveness of the current guidelines system.

With the recent economic crisis there has been much discussion of how to reduce the overall cost of our federal, state, and local corrections system without negative consequences for public safety. Strategies consistent with this reform agenda now even have a name—justice reinvestment. Concomitantly, there has been a renewed interest in developing evidence-based policies and practices with the ability to change both offenders and communities (Austin, 2009a, 2009b; Byrne, 2009a, 2009b, 2009c; Byrne & Taxman, 2005, 2006; Clear et al., 2003; Jacobson, 2005; MacKenzie, 2006; Maruna & Toch, 2005; Mears & Bhati, 2006; Petersilia, 2006; Stemen, 2007; Travis & Waul, 2003; Villetez, Killias, & Zoder, 2006). Members of the Division on Corrections and Sentencing have played a central role in evaluating and proposing this new reform agenda. In the following article, we examine one facet of this reform agenda in detail—federal sentencing guidelines—and offer our initial reform recommendations.

We begin our examination of federal sentencing guidelines by detailing how both the types of offenders and types of crimes prosecuted in our federal court system have changed since the passage of the Sentencing Reform Act of 1984. We then describe how various types of alternative sanctions—probation, probation and confinement, and prison/community split sentences—are currently being used in conjunction with federal sentencing guidelines in the sentencing of this new generation of federal offenders. We consider the issue of whether specific changes in sentencing guidelines are needed to increase the use of alternative sanctions, and reduce post-*Booker* guideline departures.[1] We conclude by estimating the impact of both sentencing guidelines reform and community-based program reform on public safety and the cost of corrections. It is our view that even small, incremental changes in sentencing guidelines—when combined with improvements in community-based programs in the area of offender treatment—will have a significant impact on the effectiveness of federal sentencing (see Sentencing Guideline Grid in Table 1).

CHANGES IN FEDERAL OFFENDERS AND FEDERAL CRIMES

Much has changed since the passage of the Sentencing Reform Act of 1984 due to changes in *laws* (e.g., mandatory minimums for drug offenders, weapons

law violators, and other categories of offenders; new laws to address techno-crime), changes in *technology* (e.g., the Internet has spawned new opportunities for a variety of old crimes—fraud, gambling, sex crimes—and created new categories of offenders and victims), and changes in *immigration* (in particular, the recent surge in illegal immigration from Mexico). As a result, the federal offender population today looks quite different from the federal offender population in 1984. Examination of the most recent figures available from the U.S. Sentencing Commission (October 1, 2008, through March 31, 2009) reveals that there are currently four major categories of federal offenders.

1. Immigration violators (32.2%)
2. Drug law violators (30.6%) (with the three major drug types of powder cocaine, crack cocaine, and marijuana)
3. Fraud, larceny, and other white collar offenders (14.8%)
4. Weapons law violators (10.4%)

While an examination of the immigration issue is beyond the scope of this review, it should be noted that as of March 31, 2009, 43.8% of all federal offenders were not U.S. citizens, and two-thirds were being held for violations of immigration laws. By comparison, in 1984 only a fraction of all federal offenders were not U.S. citizens—of these, the majority were convicted of drug trafficking. Unlike their earlier counterparts, the majority of non-U.S. citizens currently held—both pretrial and postconviction—in federal prisons are not a threat to public safety (Hickman & Suttorp, 2008).

One final change that can be documented over the past 25 years is *public attitudes* toward the sentencing of offenders. While the public appears to support a more punitive approach to offenders who commit financial crimes and sex crimes, the same "public" now recognizes the need for rehabilitation—particularly for the subgroup of our federal and state offender population with serious mental health and substance abuse problems. While several new state-level initiatives have been initiated and evaluated (e.g., drug courts, mental health courts, new proactive community supervision initiatives), the federal system has lagged behind. However, the recent addition of new federal judges with prior successful experiences with the use of rehabilitation-focused sanctions at the state level may be at least a partial explanation for the increased proportion of federal sentences that are below the recommended federal sentencing guideline range. This suggested that many federal judges may be amenable to the expanded utilization of alternative sanctions, particularly if there is mounting evidence that the imposition of these sanctions does not pose a public safety threat, but does provide an opportunity for not only short-term offender control, but also long-term offender change.

Table 1: 2003 federal sentencing guidelines.

		Criminal history category (Criminal history points)					
	Offense level	**I (0 or 1)**	**II (2 or 3)**	**III (4, 5, 6)**	**IV (7, 8, 9)**	**V (10, 11, 12)**	**VI (13 or More)**
Zone A	1	0–6	0–6	0–6	0–6	0–6	0–6
	2	0–6	0–6	0–6	0–6	0–6	1–7
	3	0–6	0–6	0–6	0–6	2–8	3–9
	4	0–6	0–6	0–6	2–8	4–10	6–12
	5	0–6	0–6	1–7	4–10	6–12	9–15
	6	0–6	1–7	2–8	6–12	9–15	12–18
	7	0–6	2–8	4–10	8–14	12–18	15–21
	8	0–6	4–10	6–12	10–16	15–21	18–24
Zone B	9	4–10	6–12	8–14	12–18	18–24	21–27
	10	6–12	8–14	10–16	15–21	21–27	24–30
Zone C	**11**	8–14	10–16	12–18	18–24	24–30	27–33
	12	10–16	12–18	15–21	21–27	27–33	30–37
Zone D	13	12–18	15–21	18–24	24–30	30–37	33–41
	14	15–21	18–24	21–27	27–33	33–41	37–46
	15	18–24	21–27	24–30	30–37	37–46	41–51
	16	21–27	24–30	27–33	33–41	41–51	46–57
	17	24–30	27–33	30–37	37–46	46–57	51–63
	18	27–33	30–37	33–41	41–51	51–63	57–71
	19	30–37	33–41	37–46	46–57	57–71	63–78
	20	33–41	37–46	41–51	51–63	63–78	70–87
	21	37–46	41–51	46–57	57–71	70–87	77–96
	22	41–51	46–57	51–63	63–78	77–96	84–105
	23	46–57	51–63	57–71	70–87	84–105	92–115
	24	51–63	57–71	63–78	77–96	92–115	100–125

(*Continued*)

Table 1: (*Continued*)

Offense level	Criminal history category (Criminal history points)					
	I (0 or 1)	II (2 or 3)	III (4, 5, 6)	IV (7, 8, 9)	V (10, 11, 12)	VI (13 or More)
25	57–71	63–78	70–87	84–105	100–125	110–137
26	63–78	70–87	78–97	92–115	110–137	120–150
27	70–87	78–97	87–108	100–125	120–150	130–162
28	78–97	87–108	97–121	110–137	130–162	140–175
29	87–108	97–121	108–135	121–151	140–175	151–188
30	97–121	108–135	121–151	135–168	151–188	168–210
31	108–135	121–151	135–168	151–188	168–210	188–235
32	121–151	135–168	151–188	168–210	188–235	210–262
33	135–168	151–188	168–210	188–235	210–262	235–293
34	151–188	168–210	188–235	210–262	235–293	262–327
35	168–210	188–235	210–262	235–293	262–327	292–365
36	188–235	210–262	235–293	262–327	292–365	324–405
37	210–262	235–293	262–327	292–365	324–405	360–life
38	235–293	262–327	292–365	324–405	360–life	360–life
39	262–327	292–365	324–405	360–life	360–life	360–life
40	292–365	324–405	360–life	360–life	360–life	360–life
41	324–405	360–life	360–life	360–life	360–life	360–life
42	360–life	360–life	360–life	360–life	360–life	360–life
43	life	life	life	life	life	life

1. The Offense Level (1–43) forms the vertical axis of the sentencing table. The Criminal History Category (I–VI) forms the horizontal axis of the table. The intersection of the Offense Level and Criminal History Category displays the guideline range in months of imprisonment. "Life" means life imprisonment. For example, the guideline range applicable to a defendant with an Offense Level of 15 and a Criminal History Category of III is 24–30 months of imprisonment.
2. In rare cases, a total offense level of less than 1 or more than 43 may result from application of the guidelines. A total offense level of less than 1 is to be treated as an offense level of 1. An offense level of more than 43 is to be treated as an offense level of 43.
3. The Criminal History Category is determined by the total criminal history points from Chapter Four, Part A, except as provided in §§4B1.1 (Career Offender) and 4B1.4 (Armed Career Criminal). The total criminal history points associated with each Criminal History Category are shown under each Criminal History Category in the sentencing table.

Historical note: Effective November 1, 1987. Amended effective November 1, 1989 (see Appendix C, amendment 270); November 1, 1991 (see Appendix C, amendment 418); November 1, 1992 (see Appendix C, amendment 462).

THE CURRENT USE OF ALTERNATIVE SANCTIONS

According to the January 2009 report by the U.S. Sentencing Commission, 21.5% (or 13,771) of the 63,906 federal offenders sentenced in 2007 were classified as zone A, B, or C offenders—which made them potentially eligible for alternative sanctions. However, it is prison that is the sanction of choice for offenders in each of these alternative sanction zones. For offenders in zone A, 48.4% receive prison-only sentences; in zone B, 58.4% of all offenders receive a prison-only term; and in zone C, 66.4% receive a prison-only sentence. By comparison, 94.6% of all zone D offenders received a prison-only sentence in 2007.

Why are we overutilizing prison and underutilizing alternative sanctions? One explanation offered in the U.S. Sentencing Commission report is the citizenship effect: "More than one-third (37.4%) of offenders are non-citizens, the overwhelming majority of whom are illegal aliens" (2009a, p. 4).The percentage of noncitizen offenders in each zone is as follows: zone A (43.7%); zone B (45.0%); zone C (50.8%); and zone D (33.1%). Because illegal aliens are assigned by the U.S. Bureau of Prisons to the second-highest custody level, they are—by policy, not guidelines—essentially ineligible for alternative sanctions. The fact that these offenders (1) do not have high criminal history scores and (2) have been convicted of crimes that are deemed of lesser seriousness is worth noting. Before the federal sentencing guidelines were fully implemented (in November 2007), the proportion of noncitizens in our federal corrections population was much smaller. For example, immigration violations comprised 4.0% of all federal prisoners in 1986, and only 5.6% in 1997; by March 2009, 34% of all federal prisoners were immigration violators (U.S. Sentencing Commission, 2009b). Clearly, this is a problem that must be addressed, although it appears to be beyond the boundary of the U.S. Sentencing Commission.

However, it is important to consider the fact that alternative sanctions are still underutilized for the subgroup of U.S. citizens sentenced in the federal system. In 2007, 18.1% of zone A offenders, 32.6% of zone B offenders, and 37.7% of zone C offenders received a prison-only sentence. This represents approximately 5% (2,076 of 40,720) of all U.S. citizens sentenced in 2007. In zone D, U.S. citizens received prison-only sentences 92.5% of the time. Overall, 81.1% of all sentenced U.S. citizens received prison-only sentences (U.S. Sentencing Commission, 2009a).

Examination of within-zone sentencing patterns reveals that judges appear to have the most difficulty identifying the appropriate "intermediate" sanctions for offenders in zones A, B, and C. In zone A, 75% of U.S. citizens are sentenced to probation-only, which is consistent with the guidelines, but the second-most likely sanction was prison-only (18.1%). In zone B, 42.2% of offenders received a sentence of probation and confinement, which appears

consistent with the guidelines, but again the second-most likely sanction was prison (32.6%), followed by probation (17.1%), and prison/community split (8.1%). In zone C, the lack of uniformity in sentencing is the most pronounced, with sentences as follows: prison-only (37.7%), prison/community split (32.1%), probation and confinement (17.2%), and probation only (13.0%).

For a variety of reasons—the citizenship effect, mandatory minimums for drug offenders, and judges' lack of confidence in alternative sanctions for guideline-eligible offenders are three that come immediately to mind—the past decade has been marked by slight increases in the use of prison-only sentences; this upward trend has slowed but persists post-*Booker* (Cole, 2009; U.S. Sentencing Commission, 2006, 2009a). The fact that the percentage of within-range sentences dropped significantly post-Blakely[2] and post-Booker (from 73% in 2004 to just under 60% in 2009) underscores the need to rethink our current sentencing guidelines system. By definition, a guideline system with this proportion of out-of-range sentences is a system in need of reform.

Between 1997 and 2007, the percentage of offenders receiving a prison-only sentence increased from 75.4% to 85.3%, with a corresponding decrease in the utilization of alternative sanctions—from 24.6% to 14.7%—during this same period (U.S. Sentencing Commission, 2009a). These changes are not simply a product of the increasing size of the noncitizen federal offender population. Looking only at U.S. citizens, we see the following: in zone A, the percentage of offenders receiving probation-only sentences has increased slightly between 1997 and 2007 (from 73.6% to 75.5%); but in zone B, the percentage receiving the presumptive term (probation with confinement) has decreased from 49.8% to 42.2%; while in zone C, the percentage receiving the presumptive term (prison/community split) dropped slightly, from 35.3% to 32.1%. Based on these figures, it appears that strategies designed to increase the utilization of alternative sanctions for zone A, B, and C offenders should be considered.

During this same review period, the corresponding decreases in the utilization of alternative sanctions for noncitizens are dramatic: by 2007, only 13.1% of zone A noncitizens received a probation-only sentence; 4.4% of zone B offenders received a probation/confinement sentence, and 3.2% of zone C offenders received prison/community split sentence (U.S. Sentencing Commission, 2009a, pp. 6–8). If this sentencing trend persists, we will see an increased proportion of noncitizen federal prisoners over the next several years. The fact that a significant number of these federal offenders do not have either extensive criminal histories or serious offense convictions—in 2009, 11,162 of the 16,162 non-U.S. citizens in federal prison were convicted of immigration violations—raises obvious concerns, but the solution to this problem appears to lie outside the purview of the U.S. Sentencing Commission (Lopez & Light, 2009; U.S. Sentencing Commission, 2009a).

ASSESSING THE LIKELY IMPACT OF SENTENCING GUIDELINE REFORMS DESIGNED TO INCREASE THE UTILIZATION OF ALTERNATIVE SANCTIONS

Any recommendations for reform of current sentencing practices through changes in federal sentencing guidelines must begin with the following caveat: the sentences imposed on noncitizens must be examined separately from the sentences imposed on U.S. citizens. In large part, this is because the vast majority of noncitizens are not eligible for alternative sanctions despite their guideline location in one of the three alternative sanction zones, since they are classified as deportable. For this reason, our initial assessment will focus on recommendations for reforming the sentencing of U.S. citizens, which represent about two-thirds of all sentenced federal offenders.

A review of current federal sentencing practices reveals that about eight of every ten sentenced offenders received a prison sentence; for U.S. citizens receiving a prison sentence, the average prison sentence is 76 months (U.S. Sentencing Commission, 2009a). The remaining federal offenders are sentenced to one of the following alternative sanctions.

1. *Prison split with community confinement* was used for 4.7% of sentenced offenders in 2007. This typically involves nine months of prison followed by six months of community confinement, which may involve either home confinement (three-quarters of the cases) or residence in a community treatment center or halfway house of some kind (one-quarter of these cases).
2. *Probation with confinement* was used for 5.8% of all sentenced offenders in 2007. This typically includes 6 months of confinement followed by 33 months of probation. For nine-tenths of these cases, the offender was "confined" via home confinement;
3. *Probation only* was the sanction used for 8.4% of all offenders sentenced in 2007. The average length of probation supervision is 33 months.

With only a few exceptions, monetary penalties—including fines, cost of supervision/home confinement, and restitution—are imposed as add-ons to either prison or one of the three other sanctions just identified. According to the U.S. Sentencing Commission (2009a, p. 10), "Overall, monetary penalties . . . are imposed for approximately one-third (34.7%) of U.S. citizen offenders sentenced in fiscal year 2007 . . . the median monetary penalties . . . range from $3,834 for offenders sentenced to probation, to $20,568 for offenders sentenced to prison/community split."

Focusing on federal offenders who are U.S. citizens, it is clear that alternative sanctions are being underutilized for zone A, B, and C offenders who

are eligible for alternative sanctions under current sentencing guidelines. In 2007, there were 2,076 alternative sanction zone offenders who received prison-only sentences. The U.S. Sentencing Commission should consider revising current guidelines in ways that will preclude the imposition of prison-only sentences for these offenders, while also providing additional education/training opportunities for federal judges on the efficacy of alternative sanctions. If such procedures were in place in 2007, the overall number of federal offenders (including both citizen and noncitizens) sentenced to a prison-only term would have dropped from 63,753 to 61,677 offenders, a 3% decrease.

One reason for opting for a prison-only sentence is a lack of confidence in available alternative sanctions. Given the above sentencing patterns, it appears that judges may not be convinced that (1) sentencing zone B offenders to probation and confinement is the appropriate sanction (they use it about 42% of the time for zone B offenders) or that (2) sentencing zone C offenders to prison/community split sentences is the appropriate sanction (they use it 32% of the time for zone C offenders). In response to the underutilization of these sanctions, this may be a good time for the U.S. Sentencing Commission to rethink the types of alternative sanctions needed for the current group of federal offenders; the evidence supporting the use of split sentences as a recidivism reduction strategy is weak, as is the evidence supporting the use of home confinement (Byrne, 2008, 2009a).

Our point is simple—we need to develop a new generation of community-based sanctions designed to address the problems of the ever-changing federal offender population. Since a significant proportion of these offenders have serious, but treatable, substance abuse or mental health problems, we need to develop alternative sanction programs that not only emphasize short-term offender control (through home confinement), but also long-term offender change (through participation in both residential and nonresidential treatment). A significant number of federal offenders return to federal prison each year because they have violated alternative sanction conditions or they have been convicted of a new crime (Sabol et al., 2000). To the extent that these "new generation" sanctions work to reduce recidivism and the rate of return to prison among federal offenders, additional (but small, on the order of 3%) decreases in federal prison populations would be realized according to one recent simulation study (Austin, 2009b).

Up to this point, we have focused my review on the subgroup of U.S. citizen federal offenders who are eligible for alternative sanctions because they fall in zones A, B, and C of the sentencing table in the federal sentencing guidelines manual. However, it appears that the U.S. Sentencing Commission may want to use the twenty-fifth anniversary of the passage of the Sentencing Reform Act of 1984 as a watershed moment, and consider possible reforms to the table. Several recent reviews of post-*Booker* federal sentencing guidelines have recommended simplifying the offense seriousness levels and reconsidering where we draw the line between zone C and zone D (the incarceration zone).

By reducing the current 43 offense levels to 10, and dropping the number of criminal history categories from six to five (by collapsing the last two categories), the uniformity of sentences should be improved (at least in theory). However, the key to any revisions to the existing sentencing table will be the determination of which cells on the table fall in the incarceration zone. While the upper cutoff point for zone C is currently offense level 12, it appears that even minor changes in cutting points using the existing offense levels would result in a much larger proportion of federal offenders being eligible for alternative sanctions. Consider the following 2007 data on federal sentencing (citizen and noncitizen combined) by offense severity level:

- 4,767 offenders were designated offense level 12
- 280 offenders were designated offense level 13
- 3,188 offenders were designated offense level 14

Expanding zone 3 to include all offenders with severity scores between 12 and 14, thereby moving the start point for the incarceration zone to offense level 15, would have increased the number of offenders eligible for alternative sanctions by 8,235; in 2007, 11% of all federal offenders (citizen and noncitizen) were classified in levels 12–14. Clearly, even small changes in the cutting points of the sentencing table will have a large effect on the size of the federal prison population. Assuming that two-thirds of the offenders included in these three categories are U.S. citizens, another 5,400 offenders would have been eligible for alternative sanctions. If these alternatives were used exclusively for all 12–14 offense level offenders in 2007, then the U.S. prison population would have dropped from 33,022 (U.S. citizens in prison) to 27,622, a decrease of 16.4%.

To summarize, the following three simple recommendations—focusing exclusively on federal offenders who are U.S. citizens—have been proposed here.

1. Restructure federal sentencing guidelines to limit the use of prison-only sentences for zone A, B, and C offenders (U.S. citizens only), resulting in an estimated drop in the overall federal prison population from 63,753 to 61,677 offenders, a 3% decrease.
2. Redesign existing alternative sanctions based on a review of "what works" with specific subgroups of federal offenders (e.g., drug offenders, white collar offenders, sex offenders, etc.); it is estimated that these "new generation" sanctions will reduce recidivism and the rate of return to prison among federal offenders, resulting in additional (but small, on the order of 3%) decreases in federal prison populations.
3. Expand the alternative sanction zone in the current sentencing guideline table, targeting offense levels 12–14 for alternative sanctions—increasing

the number of U.S. citizens eligible for alternative sanctions by 5,400, and decreasing the federal prison population by 8.5%.

Overall, these three recommendations would have reduced our federal prison population by approximately 15% if they were fully implemented in 2007. While others (e.g., Austin, 2009a, 2009b) have proposed changes in federal sentencing practices that promise much greater gains, we have focused exclusively on guideline-based reforms here.

CONCLUDING COMMENTS: THE LIMITS OF REFORM

Based on our review, we have reached the following conclusions about alternative sanctions. First, alternative sanctions are underutilized for federal offenders who fall into zones A, B, and C on the sentencing guidelines grid. Second, alternative sanctions can be expanded to include offenders currently receiving prison terms without undermining the original intent of the sentencing guidelines. Third, the current sentencing guidelines grid needs to be restructured to reflect changes over the past twenty-five years in the type of crimes—and in the public's view of seriousness of crimes—prosecuted in our federal courts. Reducing the number of cells in the sentencing table (both for offense levels and criminal history) is the first step in this process. Fourth, alternative sanctions—when implemented fully and focused on offender change—can improve public safety and save taxpayers money, but even greater gains may be achieved by (1) revising mandatory minimum sentencing laws, (2) designing strategies that recognize the link between individual and community change, and (3) addressing the problems posed by the continued use of incarceration (at both the pretrial and sentencing stage) for non-U.S. citizens held for immigration violations (Byrne, 2009a).

In our view, these findings underscore the need to reform current sentencing guidelines. The three simple recommendations we have offered—focusing exclusively on federal offenders who are U.S. citizens—would have reduced our federal prison population by approximately 15% if fully implemented in 2007. While others (e.g., Austin, 2009a, 2009b) have proposed changes in federal sentencing practices that promise much greater gains, we have focused exclusively on guideline-based reforms targeting U.S. citizens here. Taken individually, these represent modest proposals for reform—but taken collectively, these recommendations will likely have a significant impact on the size of our federal prison population, with no negative consequences in terms of either public safety or cost.

NOTES

1. Booker Decision: The Supreme Court's *Booker* decision on January 12, 2005, changed the federal sentencing guidelines from mandatory to advisory. For a review of the impact of the *Booker* decision on subsequent sentencing decisions, see Meese and Heymann (2006).

2. Blakely Decision: "The constitutionality of the federal sentencing guidelines, and nearly a dozen state sentencing guidelines schemes, was seriously called into question June 24, 2004, with the Supreme Court's decision in *Blakely v. Washington*, No. 02-1632. The case, following the line of *Apprendi v. New Jersey* and its progeny, held that no sentence in a criminal case can be enhanced beyond the statutory maximum for an offense unless the fact is found by a jury or the defendant waives the jury (or pleads guilty to it)." See http://www.nacdl.org/booker

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