

SUPPORTING STATEMENT COPS Non-Hiring Progress Report

Part A. Justification:

1. Necessity of Information Collection

The Office of Community Oriented Policing Services (COPS) was established under the authority of the Attorney General to implement Title I of the “crime bill,” the Public Safety Partnership and Community Policing Act of 1994 (the Act). The Act authorizes the Attorney General to make grants to States, units of local government, Indian tribal governments, other public and private entities, and multi-jurisdictional or regional consortia thereof to increase police presence, to expand and improve cooperative efforts between law enforcement agencies and members of the community, to address crime and disorder problems, and otherwise to enhance public safety.

As a grant-making agency, the COPS Office is charged with monitoring each program, project or activity it funds. To accomplish this, COPS has developed data collection instruments and programmatic progress reports, and has implemented a comprehensive monitoring plan including these reports, proactive phone contact, and site visits.

The Non-Hiring Progress Report will be an important instrument in our grant management and monitoring plan, and will be used to measure our grantees’ progress in grant implementation and to track the community policing activities of grant recipients. The schedule for the collection of this information is set forth in accordance with 28CFR§66.40, “grantees shall submit annual performance reports unless the awarding agency requires quarterly or semi-annual reports... Annual reports shall be due 90 days after the grant year.” Under 28 CFR§70.51, performance reports for institutions of higher learning and non-profit organizations must be collected on a quarterly basis, and are due 30 days following the reporting period. These grants are typically provided from the Community Policing Development program area.

2. Needs and Uses

The Non-Hiring Progress Report (NHPR) solicits information about the grantees’ progress toward implementation of their COPS Non-Hiring grants and their community policing activities. To help manage the monitoring of grants, the COPS Office must obtain updated information from grantees at regular intervals. Progress reports help to determine the status of implementation of community policing and purchases of equipment, technology, training, and other items awarded under COPS non-hiring grants. The Grant Monitoring Division uses the information collected for pre-site visit preparation and the Grants Administration Division uses the information to further enhance the technical assistance and customer service provided to grantees. The Program, Policy Support and Evaluation Division also uses this information for evaluation of the programs funded by the COPS Office as well as the development of future programs.

The COPS Office plans to use the information collected to improve the management of our non-hiring grants and to identify grantees that may require additional technical assistance to achieve successful grant implementation. The COPS Office will identify the need for additional technical assistance based upon the grantee's answers to the progress report questions. For example, there is a specific question regarding the issues that grantees may be experiencing in grant implementation. If a grantee states in that question that they need assistance, their specific answer will pull into a system report and they will receive a phone call from the COPS Office. Another example would be if a COPS Methamphetamine grantee reports that they will not be assessing their project. That answer would generate a report as those grantees are required to assess their program. Any issues that arise will be handled at the individual grantee level.

Although the COPS Office will be handling issues that arise with each individual grantee, we will also look for trends in the answers. If, for example, a majority of grantees report that they are having difficulty implementing their grant because of the same reason, this will be an area where the COPS Office can explore how to better meet their needs. This could result in additional information being sent to them on that specific topic, updates to their Grant Owner's Manual, or other mechanisms of assistance.

All COPS grantees that have active non-hiring grants will be required to complete the NHPR on at least an annual basis. Grantees that have active grants and were awarded Community Policing Development funding will be required to complete a progress report quarterly. In addition, as grants expire, the NHPR which will serve as a final report for grant closeout purposes.

3. Efforts to Minimize Burden

The new NHPR was part of a business process improvement effort aimed at minimizing the reporting burden on COPS grantees by streamlining the collection of progress report information into one annual report (or quarterly reports as required for community policing development grantees). Once OMB approves this report and it is developed online (online development completion expected January, 2008), the COPS Office plans to eliminate the following progress reports that have been in use: Training and Technical Assistance Semi-Annual Status Report (1103-0043); Mental Health and Community Safety Initiative Equipment and Training Progress Report (1103-0078); Tribal Resources Grant Program Equipment/Training Progress Report (1103-0087); Methamphetamine Project Final Update Report (1103-0091); and the Methamphetamine Project, Status Update Report (SUR) (1103-0092). In addition, the Annual Report to Congress-Expired COPS Awards Exceeding \$5 million (1103-0099) will be modified to include only hiring grants.

The new NHPR will minimize the reporting burden on grantees significantly. The greatest impact will be for those grantees that have more than one different type of COPS non-hiring grant. For example, a grantee who has received a COPS Combating Methamphetamine grant and a Tribal Resources Grant Program grant will only be required to complete one annual report for both programs. This will simplify the process for grantees by having only one collection schedule and standardized questions for all grant types.

The COPS Office is committed to furthering our E-government projects and plans to minimize respondent burden by administering the NHPR using an Internet-based system that will allow the respondents to electronically submit their reports. Grantees without access to the Internet will be contacted by the COPS Office and provided the opportunity to complete their report over the phone. This report will then be manually entered into the system. The Internet-based NHPR will include pre-populated data based on grant award and respondent information found in the COPS Management System, thus minimizing the amount of information the respondent must enter.

4. Efforts to Identify Duplication

There is no duplicative effort.

5. Methods to Minimize Burden on Small Business

This collection instrument will have no significant impact on small business.

6. Consequences of Less Frequent Collection

Annual reports are mandated in 28 CFR 66.40 for public agencies and quarterly reports in 28 CFR 70.50 for non-profits and universities. Less frequent collection would not allow the COPS Office to obtain the most current information on our grantees' grant implementation efforts and community policing activities. It would hinder our ability to report on the grantees' implementation of their non-hiring grants.

7. Special Circumstances Influencing Collection

There are no special circumstances that would influence the collection of information pertaining to the NHPR.

8. Reasons for Inconsistencies with 5 CFR 1320.6

There are no inconsistencies with this regulation.

9. Payment or Gift to Respondents

The COPS Office does not provide any payment or gift to respondents. Furthermore, it is not permitted under the terms of the grants.

10. Assurance of Confidentiality

No assurance of confidentiality has been made to respondents.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature. No information commonly considered as private is included in the proposed requested information.

12. Estimate of Hour Burden

There will be approximately 1,500 grantees submitting an active annual NHPR, approximately 75 grantees submitting quarterly reports, and approximately 1,400 grantees submitting final reports. The estimated time to complete the progress report is one hour per grantee submission.

1 hour per respondent x 1,500 respondents = 1,500 annual hours

1 hour per respondent x 75 respondents x 4 quarters = 300 annual hours

1 hour per respondent x 1,400 respondents = 1,400 annual hours

Total Annual Respondent Burden: 3,200 hours

There is no record keeping burden for this collection.

13. Estimate of Cost Burden

Completing this report will not generate any costs other than those associated with the applicants' time. Therefore, the estimated burden cost is 0.

14. Estimated Annualized Cost to Federal Government

The estimated annualized cost to the Federal government for a contracting agency to review, compile, and process the NHPRs should require approximately 2.35 hours per report. No special equipment, other than currently in-use personal computing equipment, is required. The total annual cost to the Federal government is estimated as follows:

2.35 hours per report x 3,200 reports per year = 7,520 hours

7,520 hours @ \$54.72 per hour = \$411,494.40 annually

15. Reason for Change in Burden

Since this is a new collection, there is no change in burden.

16. Publication

This data collection will not be published.

17. Request not to Display OMB Control Number

COPS will display the OMB approval number and expiration date on the upper right hand corner of the collection instrument.

18. Exceptions to Certification Statement

COPS does not request an exception to the certification of this information collection.

Part B. Statistical Methods: Not applicable