

SUPPORTING STATEMENT

COPS Office Monitoring Information Collections

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.

The Attorney General, through the COPS Office, is required by the Act to include a monitoring component in its programs. In addition to the general monitoring requirement established by the Act, the COPS Office must also monitor grant-funded criminal intelligence systems, as mandated by 28 C.F.R. Part 23. The COPS Office has developed the following streamlined series of information collections (the “Monitoring Information Collections”) to standardize and simplify its monitoring activities:

1. Monitoring Request for Documentation
2. 28 C.F.R. Part 23 Monitoring Kit

The *Monitoring Request for Documentation* collection contains a series of questions collecting data regarding the status of COPS hiring grants. Questions are tailored as necessary to the grantee in question (for example, the collection may include a question regarding delinquent progress reports if applicable to the grantee being monitored), with the majority of questions regarding hiring status, staffing levels, and retention of officer positions applicable to every respondent. The *Monitoring Request for Documentation* collection is used annually for approximately 40 grantees that are selected by the Grants Monitoring Division using a series of risk-based criteria.

The *28 C.F.R. Part 23 Monitoring Kit* collection contains a Monitoring Checklist that grantees reporting the operation of a COPS grant-funded criminal intelligence system must review and compare to their system, followed by a Certification that is returned to the COPS Office confirming the grantee’s compliance with the requirements of 28 C.F.R. Part 23 or an Alternative Certification that allows the grantee to report that it is not in fact operating a criminal intelligence system or that it is doing so in a manner that exempts it from the coverage of 28 C.F.R. Part 23. The *28 C.F.R. Part 23 Monitoring Kit* collection is used annually for approximately 100 grantees that have previously reported their intent to use COPS grant funds to operate a criminal intelligence system.

2. Needs and Uses

The information collected in the Monitoring Information Collections will be used to monitor the selected grantees' use of COPS hiring and equipment grant funds to ensure compliance with applicable program requirements, regulations, and laws.

3. Efforts to Minimize Burden

The Monitoring Information Collections are designed to be simple, straightforward, and easy to complete. They were developed to standardize and streamline the COPS Office's monitoring activities by providing grantees with clear guidance and easily completed charts and certification forms. From experience, the COPS Office has learned that it is extremely helpful to grantees if we provide a basic chart for their completion, rather than simply asking an open-ended question regarding their officer hiring history, for example, and expecting them to produce the data in a clear format. The information requested in the *Monitoring Request for Documentation* is a minimal amount of basic data necessary to monitor compliance with primary grant requirements (and, as noted above, certain questions can be deleted if not applicable to the grantee being monitored to further reduce the burden on the respondent).

Similarly, the *28 C.F.R. Part 23 Monitoring Kit* was designed to satisfy the monitoring requirement of the regulation with a minimal amount of burden on the grantees. This information collection takes the place of a previous monitoring approach that was highly burdensome on grantees, requiring them to write criminal intelligence system operating manuals and submit them for review and approval – a time consuming process that exceeded the regulatory requirements. Accordingly, the COPS Office streamlined this monitoring process to the least burdensome approach for respondents, as reflected in the *C.F.R. Part 23 Monitoring Kit*.

With all Monitoring Information Collection instruments, the COPS Office has made every effort to eliminate unnecessary burden on respondents, reduce required burden, and provide simple, easily completed charts or certification forms for responses.

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. The overwhelming majority of COPS Office grants and cooperative agreements are provided to state, local, and tribal law enforcement agencies.

6. Consequences of Less Frequent Collection

Less frequent collection is not possible, as the Monitoring Information Collection instruments are generally used only once per grantee (if selected for the particular monitoring).

7. Special Circumstances Influencing Collection

There are no special circumstances that would influence the collection of information in the Monitoring Information Collections.

8. Reasons for Inconsistencies with 5 CFR 1320.6

There are no inconsistencies with this regulation. The 30 and 60-day notices were published and no public comments were received.

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

Information Collection Titles	Annual Number of Responses	Hours Per Response
Monitoring Request for Documentation	40	3 (120 total)
28 C.F.R. Part 23 Monitoring Kit	100	2 (200 total)
Totals	140	320

As the chart above illustrates, there may be as many as 140 COPS Office grantees annually who will be required to complete a Monitoring Information Collection.

$$\begin{array}{r} 40 \text{ respondents} \times 3 \text{ hours} = 120 \text{ hours} \\ 100 \text{ respondents} \times 2 \text{ hours} = 200 \text{ hours} \\ \hline \text{TOTAL} = 320 \text{ hours} \end{array}$$

There is no record keeping burden for this collection.

Total Respondent Burden: 320 hours

13. Estimate of Cost Burden

Completing the Monitoring Information Collections 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 reviewing and analyzing the projected 140 responses is outlined below. No special equipment, other than currently in-use computing equipment is required. The cost to the Federal Government is as follows:

Monitoring Request for Documentation

2.75 hour per collection x 40 collections = 110 hours

110 hours @ \$17.75 per hour = \$1,952.50

28 C.F.R. Part 23 Monitoring Kit

.25 hour per collection x 100 collections = 25 hours

25 hours @ \$17.75 per hour = \$443.75

Total Annualized Cost to the Federal Government for reviewing the Monitoring Information Collections = \$2,396.25

15. Reason for Change in Burden

This is an existing approved collection; there is no change in burden.

16. Publication

This data collection will not be published.

17. Request not to Display OMB Control Number

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

18. Exceptions to Certification Statement

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

Part B. Statistical Methods:

This collection of information does not require the employment of statistical methods.