

SUPPORTING STATEMENT
COPS Rural Law Enforcement Training Needs Assessment Survey

Part A: Justification

1. Necessity of Information Collection

The Rural Policing Institute (RPI) is a Congressionally-mandated initiative of the Federal Law Enforcement Training Center (FLETC), U.S. Department of Homeland Security. On August 3, 2007, the U.S. Congress enacted the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110-53, that called upon the Secretary of the Department of Homeland Security (DHS) to establish the RPI at the FLETC; resources for implementing the RPI were provided via passage of the DHS Appropriations Act in September 2008. Section 513 Public Law 110-53 (attached) requires the RPI to evaluate the needs of law enforcement agencies and other emergency responders in rural areas, develop expert training programs based on identified needs (and not duplicate existing training), deliver training programs to rural law enforcement officers and other emergency response providers, and conduct outreach efforts to ensure that rural agencies are aware of the training.

To address its mandate to evaluate the training needs of law enforcement personnel and emergency responders in rural areas, RPI/FLETC teamed with the Office of Community Oriented Policing Services (COPS), U.S. Department of Justice (DOJ). RPI/FLETC chose to do so because of the COPS Office's partnerships with, and 15 years experience in conducting national needs assessments of, State and local law enforcement agencies. The COPS Office routinely works with key law enforcement and community-based groups to address critical law enforcement issues by convening symposia, working groups, focus groups and conducting other customer-oriented outreach activities. RPI/FLETC believed that the COPS Office's experience and existing partnerships with organizations whose support was needed for the national training needs assessment would be invaluable in conducting the current study.

The COPS Office is administering the implementation of the Rural Law Enforcement Training Needs Assessment Project (National Training Needs Assessment and Training Validation Project), which is managed by CRA, Inc. with support from an experienced law enforcement research consultant. The project will survey law enforcement personnel in rural jurisdictions about their training needs related to their law enforcement and emergency response functions. In addition, the project will compile information on the training currently available to law enforcement in rural areas to support RPI in developing training that complements, rather than duplicates, other government-funded training.

2. Needs & Uses

The Rural Law Enforcement Training Needs Assessment survey is a new information collection process that will solicit information on the training needs of personnel in law enforcement agencies serving rural communities: (1) through the self reports of law enforcement executives and field-level personnel, and (2) via the perspectives of State Peace Officer Standards and Training (POST) and State and local Training Academy Directors. The project team, comprising CRA and its consultant, an experienced law enforcement researcher, will also compile information on existing training for law enforcement professionals serving rural jurisdictions.

The project team will analyze the information collected through the survey, including identifying the training needs of law enforcement personnel and the existing training available to them, and conduct a training gap analysis. The team will prepare a report for the COPS Office and RPI/FLETC that presents that information in aggregate form—nationally and by region. They will also make recommendations regarding the type(s) of training needs that RPI might address through the development and delivery of training, with a focus on how the training topic and mode of delivery can best meet the needs of law enforcement personnel serving rural areas.

The RPI/FLETC will use the analyses of the information collected via the survey to plan for the design and delivery of new trainings for law enforcement personnel in rural areas—nationally and by region. The information will enable the Institute to address gaps in training *and* avoid developing new training that duplicates what is currently being provided.

3. Efforts to Minimize Burden

The project team will make the survey available for completion in both Web-based (online) and hardcopy formats, and a respondent will complete the survey only once. The project team anticipates that the majority of the surveys will be completed online (Web-based) and therefore estimates that response times will be kept to a minimum.

4. Efforts to Identify Duplication

There is no duplicative effort.

5. Methods to Minimize Burden on Small Business

There is no significant impact on small business.

6. Consequences of Less Frequent Collection

This collection will occur only once. A less frequent collection or fewer respondents would not produce sufficient information to perform the training needs analysis.

7. Special Circumstances Influencing Collection

There are no special circumstances that would influence the collection of information pertaining to the Rural Law Enforcement Training Needs Assessment survey.

8. Reasons for Inconsistencies with 5 CFR 1320.6

There are no inconsistencies with this regulation. The COPS Office will display the valid OMB Control Number, expiration date, and PRA Notice on the Rural Law Enforcement Training Needs Assessment Survey. The COPS Office also sought public comment through posting 60-day and 30-day *Federal Register* notices. The COPS Office did not receive any public comments on this information collection.

9. Payment or Gift to Respondents

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

10. Assurance of Confidentiality

The project team will protect the confidentiality of potential respondents through a number of measures. First, they will not request respondent names or agency names; instead they will collect information on respondents' position type and experience level and agency demographics that will be useful in analyzing the data. Second, they will assign potential law enforcement executives, POST, and Academy Director respondents a number that they will use for tracking and follow-up/reminder purposes only. The list of those numbers will be maintained separately from the master list of potential respondents and only the principal investigator will have access to both sets of information. Moreover, the team will only report the survey results in an aggregate form and information from individual respondents will not be shared. When surveying individual field-level personnel via the training academies (e.g., police officers and deputy sheriffs), the project team will assign tracking numbers for aligning returned surveys to particular trainings (for count purposes only); the numbers will not be connected to individual field officers thereby ensuring complete confidentiality of their responses.

The project team intends to conduct the survey and tabulate the data via a third-party platform: WorldAPP Key Survey (<http://www.keysurvey.com/>). The company's Privacy Policy describes the measures by which the platform protects survey respondent confidentiality, including that it: (1) will not use the information collected through surveys hosted on their platform in any manner and (2) will hold in confidence all information provided by respondents, such as e-mail addresses. Moreover, the WorldAPP

Key Survey Privacy Policy complies with the privacy standards of TRUSTe, the leading internet privacy services provider. TRUSTe is an independent, non-profit organization that seeks to build Internet user trust by promoting and establishing fair information practices.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature. No questions about information commonly considered private will be asked in the proposed information collection process.

12. Estimate of Hour Burden

The Rural Law Enforcement Training Needs Assessment survey will be completed by rural law enforcement personnel and law enforcement trainers during a 2-month period in 2010; see the chart below for a complete list of the types of law enforcement professionals who will be asked to complete the survey.

The survey will comprise three distinct survey instruments for the following types of personnel: (1) State and local law enforcement executives, (2) law enforcement field-level personnel, and (3) State POSTs and Law Enforcement Training Academy Directors. The project will survey field-level personnel by selecting a random of 50 law enforcement training academies (10 in each region) and asking the directors to allocate time for all of the field-level law enforcement personnel attending in-service training during a designated 1-2 week period to complete the survey.

The project team will make the survey available for completion in both Web-based (online) and hardcopy formats, and a respondent will complete the survey only once. The team anticipates that the survey of field-level law enforcement personnel will require less time to complete than that of the law enforcement executives or POST and State and local Training Academy Directors because it will contain fewer questions (a subset of the questions asked of the law enforcement executives).

The project team anticipates that the majority of the surveys will be completed online (Web-based) and therefore estimates a minimal record keeping burden for respondents. The 50 Training Academy Directors who will be asked to engage training participants in completing the survey will have a record keeping burden (e.g., distributing, collecting, and mailing in the completed surveys) of approximately 1 hour during the one week in which the surveys are administered

The chart below presents the following information about the Rural Law Enforcement Training Needs Assessment survey: (1) the types of law enforcement agencies/personnel that will be surveyed, (2) the anticipated number of respondents for each type of agency/personnel to be surveyed, (3) the anticipated survey duration/burden (time required to complete the survey), (4) the total burden for each type of survey

respondent (by hours), (5) the total number of projected survey respondents, and (6) the total burden by hours.

Agency Type	Respondents	Projected Number of Respondents	Duration of Survey (Minutes)	Total Time (Hours)
Rural Law Enforcement Agency (local)	Agency Law Enforcement Executives	3000	20	1000
Rural Law Enforcement Agency Personnel Attending Academy Training	Field-level personnel	2500	10	417
State Law Enforcement Agency	Agency Law Enforcement Executives	49	20	16.3
State Special Jurisdiction Law Enforcement Agency (e.g., natural resources or fish and wildlife police)	Agency Law Enforcement Executives	300	20	100
Tribal Law Enforcement Agency	Tribal Agency Law Enforcement Executives	171	20	57
State POST and Law Enforcement Training Academy	POST and Training Academy Directors	49	30	24.5
Total Number of Respondents		6,069		
Total Burden Hours				1,614.8

The estimated hour burden to respondents for completing the above referenced survey is 16.2 minutes (.27 average hours) for each respondent.

16.2 minutes (.27 average hours) per respondent x 6,069 respondents = 1,614.8 hours

The COPS Office estimates a minimal record keeping burden for respondents.

The estimated record keeping burden to Training Academy Directors supporting the completion of the field officer survey by rural law enforcement personnel attending academy in-service training during the designated 1-week period is 1 hour for each of the 50 selected Directors that participates.

1 hour per Training Academy Director x 50 training academies = 50 hours

Total Respondent Burden: 1,614.8

13. Estimate of Cost Burden

Completing the Rural Law Enforcement Training Needs Assessment survey 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 annualized cost to the Federal government is \$421,268.98 which is part of the total contract awarded to CRA, Inc. for the National Training Needs Assessment and Training Validation Project (Contract Number: GS-10F-0088L; Order Number: DJJ09-F-1907). This amount is for the following contract tasks: (1) conducting research about and then designing and developing the Rural Law Enforcement Training Needs Assessment Survey, (2) vetting the survey instruments with subject matter experts (SMEs), (3) developing and implementing the Survey Deployment Plan (and related materials/correspondence), (4) developing and designing the Web-based survey platform, (5) deploying and following up on the survey responses, and (6) developing the final report on the survey.

15. Reason for Change in Burden

No changes, proposed new collection.

16. Publication

The primary purpose of the survey is to collect information on the training needs of law enforcement personnel serving rural areas and Indian Country for use by the RPI in making resource allocation decisions and planning future training. The agency also plans to share a summary of the survey results via a number of vehicles, as appropriate.

First, RPI may include an overview of the survey and the resulting quantitative and qualitative data in RPI/FLETC responses to requests for data from the Executive Branch, the U.S. Congress, and/or DHS. The RPI also may include information about or from survey in its annual reports and/or other documents reporting RPI/FLETC activities.

Second, the agency may share some of the survey results with key national law enforcement organizations, particularly those that provided input on the survey design and deployment. These organizations include, for example, the International Association of Directors of Law Enforcement Standards and Training (IADLEST), the Center for Domestic Preparedness (CDP), the Rural Domestic Preparedness Consortium (RDPC), the Regional Community Policing Institutes (RCPIs), the National Sheriffs' Association (NSA). This may be done via participation in select organizations' key meetings, for example, the IADLEST annual regional meetings or by producing a summary of the survey results that will be posted on the RPI Web site.

RPI anticipates (and will make final decisions on the basis of the quality of the data collected) that the summary report on the survey will include descriptive statistics (mean, median, mode, percentages) summarizing respondent ratings of their training needs—presented in the aggregate and by the subsets of respondents (i.e., by region, State, and/or law enforcement agency type). The RPI does not plan to publish the raw statistical data collected through the survey.

17. Request not to Display OMB Control Number

The COPS Office will display the OMB approval number and expiration date on the upper right had 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.