

## SUPPORTING STATEMENT

### ***Part A. Justification:***

#### 1. Necessity of Information Collection.

On September 13, 1994, President Clinton signed into law the Violent Crime Control and Law Enforcement Act of 1994 (Pub. L. 103-322). Title I of the "crime bill," the Public Safety Partnership and Community Policing Act of 1994 (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 to otherwise enhance public safety.

The Community Policing Development program that is funded out of this act was designed to develop and enhance knowledge through applied research activities related to community policing. One award made through this program was to ICF International to develop a community policing implementation self-assessment tool that will significantly advance the ability of law enforcement agencies to determine the extent of their community policing activities. In partnership with ICF International and the Police Executive Research Forum, the COPS Office developed this new assessment tool package (Community Policing Self-Assessment Tool, or CP-SAT) for use by law enforcement agencies. We now seek to make available this CP-SAT for use by law enforcement agencies that receive a COPS Office hiring grant.

#### 2. Needs and Uses

The COPS Office awarded ICF International a cooperative agreement through the Community Policing Development Program. The purpose of this project is to improve the practice of community policing throughout the United States by supporting the development of a series of tools that will allow law enforcement agencies to gain better insight into the depth and breadth of their community policing activities. These tools are designed to operationalize community policing at various levels of the agency: the officer level, the supervisor level, the command staff level, the cross-agency level, the civilian employee level, and the community level. There are three sections to each version (e.g. officer, supervisor, etc.): one each that captures information related to partnership, problem solving, and organizational change activity. The tools are not designed to measure the impact or outcomes of community policing, but rather collect information on what community policing practices are conducted. Once law enforcement administrators are able to determine what community policing activities are occurring, they can better design their strategic planning, training, outreach, and performance reporting initiatives based on their strengths and areas in need of additional attention.

To date the development, testing, and refinement of the CP-SAT has involved working directly with eight test site agencies to finalize the online version and to ensure that the draft guidebook provides effective instruction for administering the online version of the CP-SAT. After the online CP-SAT and guidebook was finalized, the COPS Office plans sponsor approximately 100

agencies through existing funding that has been provided to ICF International for the purchase of survey software licenses which serve as the CP-SAT platform. ICF will offer their assistance to work with these agencies to provide technical assistance, and survey administration and analysis support. These agencies are expected to complete the survey between Fall 2009 and Spring 2012, at which point the tool will be available online free of charge and federal involvement with the instrument will cease. This PRA request pertains to the approximately 100 agencies that will receive the CP-SAT software platform free of charge.

Under this new request, ICF International will administer the CP-SAT process to a group of up to 800 COPS grantees awarded hiring grant funding in FY09 on a voluntary basis. Under a separate contract, a contractor will administer the CP-SAT to about 350 FY11 COPS hiring grantees on a mandatory basis. These agencies are expected to complete the survey twice during their award period, which will take place between Summer 2011 and Fall 2015. This new PRA request pertains to the approximately 1,150 agencies that will receive the CP-SAT software platform free of charge.

Participation in the CP-SAT is purely voluntary for the 100 agencies included in the first collection instrument and for the new FY09 grantees, and will be mandatory for the FY11 grantees. Although we do not know the specific agencies that will be participating we have made estimates on the level of interest in participating across various agency size categories, and this is reflected in our overall CP-SAT burden estimates.

### 3. Efforts to Minimize Burden

Efforts were made to minimize the burden on respondents. First, a portion of the agencies that fall under this collection will be administering the CP-SAT voluntarily. Further, in designing the assessment questions were carefully considered and efforts were made to avoid duplication. The burden was further minimized through implementation of automated skip patterns so that participants can easily skip over sections that are not relevant to them, as well as an online version that will speed the administration of the tool to each participant. Finally, in addition to maintaining the “long form” version, for the new collection instrument we have streamlined the surveys used under the previously approved collection instrument significantly, and the average time required to complete the survey is less than 15 minutes per respondent.

### 4. Efforts to Identify Duplication

There is no duplicative effort. The survey does not duplicate a current information collection instrument.

### 5. Methods to Minimize Burden on Small Business

There is no significant impact on small business.

### 6. Consequences of Less Frequent Collection

A less frequent collection or fewer respondents would not allow sufficient information to

perform the appropriate neighborhood assessment.

#### 7. Special Circumstances Influencing Collection

There are no special circumstances that would influence the collection of information pertaining to the Community Policing Self-Assessment Tool.

#### 8. Reasons for Inconsistencies with 5 CFR 1320.6

The COPS Office did receive public comment from one individual who proposed two questions, to which the COPS Office has reviewed and provided the following responses:

Q1: Will you make the community partner survey available in Spanish?

A1: We responded to the commenter that we are considering making alternative language version available for the community partner survey, and Spanish would be the first version made available. At this point we are exploring the logistics required to deploy these, and how to incorporate these into an agency's assessment process.

Q2: Will surveys be available in hard copy version?

A2: We responded that yes, hard copy versions will be made available for those agencies and/or respondents that/who are not able to access the online survey.

#### 9. Payment or Gift to Respondents

No government funds will be used as payment or for gifts to respondents.

#### 10. Assurance of Confidentiality

In order to avoid revealing respondents' identities, the researchers will remove any individual identifiers from the data file, and survey responses will only be reported in aggregate form. Furthermore, for the agencies participating in the first approved collection instrument (the first 100) the third-party contractor (ICF) will also remove any agency-level identifiers before aggregate data is released to the COPS Office.

The CP-SAT is administered in an online format using Vovici EFM Community Web-based survey software. Vovici's survey hosting environment has been designed with security as a foremost consideration, with features such as 128 bit SSL encryption and redundant firewalls. Participant email addresses will be uploaded into the Vovici Community secure Web site and each respondent will be sent a link to the survey via their email address. Although the survey administrators can identify a participant's survey status (e.g., not started, started, completed), there are no individual identifiers in the data and there is no way to link an individual's data to their email address. If the respondent does not have an email account, participants can be directed to a URL address via alternate means (e.g., via agency memo with URL address, access to a common computer lab with the site loaded onto each computer). The confidentiality statement will also appear at the beginning of the alternative survey. All data exported from the Vovici Community secure Web site will be kept in a secured folder.

## 11. Justification for Sensitive Questions

There are questions on the survey relating to perceptions of superiors. These questions are a very important component of assessing organizational climate, and participants will be assured of the confidentiality of the survey data. There are no questions of a personal nature on the survey.

## 12. Estimate of Hour Burden

There are three collection instruments captured within this request. In the first, the CP-SAT is a resource that will be administered only in law enforcement agencies that request to administer it in their agency using the “long form” version. While it is difficult to say with certainty which law enforcement agencies will voluntarily participate in the CP-SAT, we made some reasonable estimates based on the distribution of agencies of different sizes who could participate, and therefore the resulting hour burden on those agencies and for the overall CP-SAT effort. The estimated hour burden to respondents within an agency for completing the survey is no longer than one hour for each respondent, and the total time burden across all agencies participating is estimated at 800 hours. Note that the very largest agencies are likely to employ a sampling strategy in administering the CP-SAT, which is reflected in the total time burden.

### Time and Cost Burden Estimates for One Administration of the CPSAT “Long Form”

Population Served Range	Total # Agencies	% Agencies Taking CPSAT	# Agencies Taking CPSAT	Average # officers per agency	Total Time Burden	Salary-based Cost of Burden <sup>1</sup>
250,000+	71	5%	4	2,150	430	\$8225.90
100,000-249,000	181	5%	9	290	145	\$2,773.85
50,000-99,999	441	4%	17	121	121	\$2,314.73
25,000-49,999	806	2%	16	63	63	\$1,205.19
10,000-24,999	1826	1%	18	31	31	\$593.03
<10,000	7787	.005%	39	10	10	\$171.30
Total	11,112		103		800	\$15,304

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<sup>1</sup> The Salary-based Cost of Burden was calculated using data from the ICMA Municipal Yearbook, “average starting annual salary for an officer” figures, which is estimated at 2007 levels to average \$39,726. Note that this estimate is nearly identical to DOJ Bureau of Justice Statistics (BJS) Law Enforcement Management and Administrative Statistics (LEMAS) 2007 estimated average. Based on 260 shifts per year, the average hourly salary rate used in the Salary-based Cost of Burden is estimated at \$19.13.

**Total hour burden for “long form” collection instrument: maximum of 1 hour per respondent, and total time burden is estimate at 800 hours across 103 agencies.**

For the second and third collection instruments, the “short form” CP-SAT is a resource that will be administered to two sets of agencies, those FY09 COPS hiring grantees that request to administer it in their agency, and those FY11 COPS hiring grantees that will complete the CP-SAT as a condition of their grant award. For purposes of estimating time and cost burden, these sets of grantees were combined. While it is difficult to say with certainty which law enforcement agencies will participate in the CP-SAT, we made some reasonable estimates based on the distribution of agencies of different sizes who could participate, and therefore the resulting hour burden on those agencies and for the overall CP-SAT effort. The CP-SAT will be administered twice during the grant period. The estimated hour burden to respondents within an agency for completing the survey is no longer than 15 minutes for each respondent and the time burden across all agencies participating is estimated at 23,733 hours for each administration (see chart in Section 13 below).

**Total Hour Burden for “short-form” collection instrument: 15 minutes per respondent and total time burden across the two administrations is estimated to be 47,466 hours.**

### 13. Estimate of Cost Burden

Completing the Community Policing Self Assessment Tool will not generate any costs other than those associated with the respondents’ time. Therefore, the direct cost of the tool is \$0.00. For the first collection instrument, cost burden estimates were developed based on using an annual officer salary of \$39,726, the average hourly wage for a police officer is \$19.13. Given the figures for Total Time Burden, the estimated Salary-based Total Cost of Burden for the “long form” is \$15,304.

For the “short form” administration, the COPS Office used the Bureau of Labor Statistics Division of Occupational Employment data to estimate that the average hourly wage for a line level police officer is \$25.23<sup>2</sup> and \$36.54<sup>3</sup> for supervisors. We estimate an 8:2 ratio of line level to supervisor officer participation in our survey. We therefore calculate Salary-based Cost of Burden using a mean hourly wage of \$27.49 and the 15 minute cost of burden at \$6.87. Given the figures for Total Time Burden, the estimated Salary-based Total Cost of Burden across all agencies covered under this request is \$163,045.70 per administration, and \$326,091 for both “short form” administrations.

#### Time and Cost Burden Estimates for One Administration of the CPSAT “Short Form”

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<sup>2</sup> US Bureau of Labor Statistics Division of Occupational Employment, *33-3051 Police Sheriff’s Patrol Officers*, <http://www.bls.gov/OES> (May 2008)

<sup>3</sup> US Bureau of Labor Statistics Division of Occupational Employment, *First-line Supervisors/ Managers of Police and Detectives*,

A. Population Served	B. Total # Agencies	C. Average # of Officers per Agency	D. % of Officers per Agency Taking CPSAT	E. # of Officers taking CPSAT = Time Burden per Agency <i>(C x D)</i>	F. Total # of Officers Taking CPSAT= Total Time Burden <i>(B x E)</i>	G. Total Salary-based Cost of Burden <sup>4</sup> <i>(F x \$6.87)</i>
250,000+	7	2,150	20%	430	3,010	\$20,678.70
100,000-249,999	19	290	50%	145	2,755	\$18,926.85
50,000-99,999	46	121	50%	61	2,806	\$19,277.22
25,000-49,999	84	63	60%	38	3,192	\$21,929.04
10,000-24,999	189	31	80%	25	4,725	\$32,460.75
<10,000	805	10	90%	9	7,245	\$49,773.15
Total	1150				23,733 <i>(Sum of F.)</i>	\$163,045.70 <i>(Sum of G.)</i>

**Total Salary-based Cost of Burden for “long form” is estimated to be \$15,304 across 103 agencies.**

**Total Salary-based Cost of Burden for “short form” is estimated to be \$163,045.70 per administration, and \$326,091 for both “short form” administrations, across 1,150 agencies.**

14. Estimated Annualized Cost to Federal Government

For the long form administration, there is no additional estimated annualized cost to the Federal government. The form and survey results will be processed by the grantee. For the short-form administration, the COPS Office is currently examining different methods to deliver this resource, and therefore we do not yet have an estimate for what it will cost. However we do anticipate the need to fund a third-party provider to deliver this resource to the field.

15. Reason for Change in Burden

The reason for the increase in burden is because of the development of the “short form” and the increased number of law enforcement agencies we anticipate will take that version. The Spanish version of the survey will not impact the burden hours, as these hours have already been accounted for in the short form.

16. Publication

<sup>4</sup> <http://www.bls.gov/OES> (May 2008)

At the end of the project, ICF International, Police Executive Research Forum, and the COPS Office will develop a guidebook to assist local law enforcement agencies in implementing the survey. The guide book will provide background information on CP-SAT and detailed suggestions for implementation that are intended for the individual(s) directing the CP-SAT effort within an agency. It is divided into two main sections, the first of which includes an overview of the self-assessment process and tool, reasons for implementing the self-assessment, and the structure of the tool. The second section provides technical guidance for completing the assessment. It focuses on the planning process, implementing the tool, data analysis and interpretation, reporting, and strategic and action planning for the future. The guide also includes a resource section to assist agencies with strategic and action planning resulting from the self-assessment process.

Information about the resource and about the development experience will be reported in the publication and will also be submitted to police-related journals and magazines, as well as professional conferences. In the event that numerous agencies administer the CP-SAT, summary statistics may be submitted for publication and/or presentation, but no identifiable information will be included.

For the “short form” administration, information summarizing the aggregated results will also be reported through various means, including COPS Office reports, newsletters, police-related journals and magazines, as well as professional conferences. Agency-level summary descriptive statistics may be submitted for publication and/or presentation, but no identifiable information will be included. These will be characterized to reflect community policing implementation within these agencies and across this subset of COPS grantees, without drawing conclusions as to the practice of community policing more broadly.

#### 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.