

1. OMB appreciates being invited to TRP/TWG meetings in general, and certainly for new or redesigned collections. Alternatively, advance briefings, during the formative stage, can be helpful. In fact, our guidance strongly encourages such advance consultation. We are surprised to learn about this collection for the first time when it is arriving for formal clearance. Please keep this in mind for the future.

Thank you for the clarification.

2. There are many assertions in the package about why “BJS needs” the information that the new census will provide. It seems a little bit circular to say that BJS needs the data to fulfill its mission unless there are users of the data identified. As BJS knows, the PRA standard for assessing utility is “actual, not merely the theoretical or potential, usefulness of the information.” Please talk about the specific identified stakeholder, especially federal, uses of the data.

Part A Sections 1 and 2 now contain additional language addressing these concerns. (See track changes.) Additionally, the SS now contains a description, beginning on page 8, of how specific federal stakeholders will use CPSC data.

3. Related, there are a list of 4 purposes of the census listed in the SPOC email, 3 of which are not discussed in the SS.

The SPOC email has been substantially revised and the 4 purposes stated in the original SPOC email are not included in the revision. Upon reflection, we felt that they were not necessary for the purpose of the email and no longer reflected BJS’ intent for the CPSC data collection.

4. Just a reminder to BJS that the PRA requires clearance for 10 or more persons; if 2 or more individuals at a specific court were asked to participate in the pilot, then the total number of persons would have exceeded 9. We look forward to a BJS/OJP generic clearance request soon to permit a more timely approval route for such requests in the future.

Language was added to Part A Section 5 (see track changes, p. 11) and Part B Section 4 clarifying only one respondent from each of the nine pilot sites was asked to complete the questionnaire.

5. Please reconcile the burden estimate of 30 minutes in SS A12 and that of 1 hour on the front of the questionnaire. In addition, please make consistent the ROCIS numbers (3,854 and 1918) and the SS numbers (3800 and 1900).

Additional text and a table were added to Part A Section 12 clarifying the apparent discrepancy (see track changes).

6. Please change the wording in the letter and on the questionnaire that seems to imply that the NCSC is the data sponsor. This is a federal collection and NCSC is the contractor or grantee working on behalf of BJS. Language like “in collaboration with BJS” or “NCSC is undertaking...” With a mention of BJS relegated to a second paragraph (or not at all as in the case of the SPOC contact email) is insufficient. Also note that the SPOC email says that the NCSC is a grantee while the SS says it is a contractor. Please reconcile

All communications and the questionnaire were revised to better reflect that BJS is the data collection sponsor and NCSC is the contractor working in behalf of BJS.

7. Please provide a screen shot of a page or two of the questionnaire (actual questions, not just welcome page).

An updated screen shot is included with this round of revisions.

OMB's recommended changes were made and highlighted using MS-WORD'S comments feature. While making the requested changes, we found other questions that could be clarified. (See questions 8, 15, 23, 30, and 31.) We made these changes (see track changes) for your review. We are willing to go back to the original versions of these questions if they do not meet OMB's standards.

8. Questionnaire

- a. the first item under question 1 may be contrasted against the second question under item 1 better if the word "single" were inserted in the phrase "Identify the SINGLE category label..."

The recommended changes were made to the questionnaire.

- b. question 1, Item d. Your professional information – this is vague. What is this asking and why is it necessary? There are a lot of items about the person when in fact you presumably already have contact information given that you contacted them in the first place from the SPOC contact information.

The question was expanded to ask for specific information.

- c. Question 4, what if the person doesn't know about the "creation" period, which apparently could have been 20 years ago?

Respondents now have the option to indicate the information is not currently available and then skip the question.

- d. Item 7 – does "poor jurisdictional compliance" mean that the city or county is not complying? Clarify.

The typo "jurisdiction" has been corrected to "offender."

- e. Question 9 – this is way too long and poorly structured. Suggest "For each of the following key stakeholders, does the Problem-Solving court mandate **any type of** training (e.g., ~~formal training curriculum, information brown bag sessions on key topics~~) specific to the needs of program participants (e.g., **about** underlying causes of their justice system involvement; **or** relevant health or behavioral problems like drug addiction, ~~mental illness, sex offending, domestic violence~~)?"

The question was revised to improve clarity. Please review this revision to see if it addresses OMB's concerns.

- f. Item 28 – is b asking about aggregate or individual data? As written, this seems unclear and if interpreted not as intended, the wrong answer could easily be provided.

The question was revised to improve clarity. Please review this revision to see if it addresses OMB's concerns.

9. Please clarify if PSCs are best thought of as a subset of all state courts or whether some are not in the universe of all courts.

Language was added in Part A Section 1 to more clearly indicate PSCs are a subset of state courts.

ISSUES 10-13: The methods section in Part B has been substantially revised in many places. Using MS-WORD's track changes function proved overly difficult to follow so we chose to "accept the changes" for ease of reading. We have tried to indicate what (and where) changes have been made to address OMB's concerns below each issue. Please note that the abstract in Part B matches the proposed changes in Part A's abstract.

10. Please explain what the 9 "core components" on page 1 of SS Part B represent – are these a second set of screening criteria (ie, if you don't have these you aren't really a PSC) or are these implying some type of implicit best practices designation, or something else?

Language was added in Part B Section 1 to more clearly indicate the nine core components are not additional screening criteria but rather serve as theoretical constructs identified by scholars that make PSC unique from other types of courts.

11. Is SS B1 really saying that the starting list by which to contact SPOCs is a 5 year old list of names, numbers/emails? If so, what is the expected yield (eg, based on estimates of job turnover in that field)? How will finding replacements be done? How long is the wait between initial contact and concluding that the person is not willing/able to be a contact? Singing the praises of the subcontractor is not a description of methodology.

This was an error. Language was added indicating SPOC lists are updated every six months independently of BJS' CPSC project. (See Part B Section 1 page 3.)

12. In the first phase of data collection (directed at the SPOCs for list building), BJS needs to provide the IC (the referenced spreadsheet template) specifying the variables listed in Part B. It sounds like the IC (or perhaps a second one) should also be capturing in a standard way the judgments or methodology used to identify PSCs, per the discussion in SS Part B.

The Excel template (attachment 13) is now provided, which specifies the variables to be collected from SPOCs. Language included on the template and attachment 10 provides specific instructions to SPOCs regarding the inclusion of PSCs and systematically provides a question to incorporate any state's definition of PSCs. (See Part B Section 1 page 4.)

13. The "further inquiry with the court" in step 2 of SS Part B 1 sounds like an additional collection (IC). It's not clear why this is necessary (e.g., is this another stage of list building by asking about other known courts), what the content of the inquiry will be, nor how this relates to already provided burden estimates. Please provide an IC and clarify each of these points.

This aspect of the methodology of was included in error due to a miscommunication between the contractor and project manager. The language was removed and this portion of the methodology was revised.

14. What is the basis for estimating 20 minutes of burden for the SPOCs? This seems quite low especially given the number of variables being requested for many courts.

Language was added to the SS in Part A Section 12 to describe the 20 minute burden estimate.

15. Please confirm that at the end of the list building phase, BJS plans to return to OMB for approval if the number of PSCs exceeds the estimate, therefore raising the burden estimates.

Language was added in Part A Section 12 and Part B Section 1 of the SS indicating BJS will return for OMB approval if the number of PSCs exceeds the estimate.