

**PAPERWORK REDUCTION ACT SUBMISSION**  
**Supporting Statement**

Agency: Federal Bureau of Investigation (FBI)

Title: FBI National Academy: United States Holocaust Memorial Museum's Law Enforcement and Society Questionnaire

Forms: FBI National Academy: United States Holocaust Memorial Museum's Law Enforcement and Society Questionnaire

OMB No: None assigned

Prepared by: Laleatha B. Goode  
Management and Program Analyst  
Federal Bureau of Investigation  
FBI Training Division  
Quantico, Virginia 22135  
Telephone: (703) 632-3495

The FBI Training Division's Curriculum Management Section (CMS), Evaluation and Assessment Unit (EAU) is requesting the Office of Management and Budget (OMB) to approve the Paperwork Reduction Act submission for a new data collection. The data collection will be directed at the FBI National Academy (NA) students.

On the behalf of the United States Holocaust Memorial Museum, the FBI Training Division will distribute to all students who attend the FBI National Academy a questionnaire titled, United States Holocaust Memorial Museum's Law Enforcement and Society Questionnaire. The questions will target the FBI National Academy students' experience with the Law Enforcement and Society program. As part of their 10-week training session at the FBI National Academy students are given a guided tour of the Holocaust Museum lead by the Law Enforcement and Society.

**A. JUSTIFICATION**

**1. Circumstances of the collection**

The FBI National Academy was created in response to a 1930 study released by the National Committee on Law Observation and Enforcement. This body was appointed by Herbert Hoover to study causes of criminal activity (largely related to prohibition) and make recommendations regarding appropriate national policy responses. One of those recommendations concerned appropriate national policy responses. Another recommendation was to

establish an "FBI Police Training School" that would offer training to law enforcement professionals from around the country to bring about greater standardization of techniques and a higher level of professionalism.

Today, the mission of the FBI National Academy is to "support, promote, and enhance the personal and professional development of law enforcement leaders by preparing them for complex, dynamic and contemporary challenges through innovative techniques, facilitating excellence in education and research, and forging partnerships throughout the world." Attendees represent state and local police and sheriffs' departments, military police organizations, and federal law enforcement agencies from the United States and over 150 foreign nations.

To meet this mission, the FBI National Academy offers a quarterly 10-week program including undergraduate and graduate courses at the FBI Academy campus, Quantico, Virginia. In addition to class work, FBI National Academy send law enforcement professionals to the United States Holocaust Memorial Museum to attend a guided tour led by the Law Enforcement and Society program (LEAS).

The LEAS program was established in 1999 and is in partnership with the Anti-Defamation League. Their purpose is to allow law enforcement officers to examine the role of the law enforcement profession and how it played in the Holocaust. In addition, it challenges law enforcement officers to reflect upon their professional and personal responsibilities in a democracy today. The program is suitable for recruit, in-service, and command professionals in law enforcement at the federal, state, and local levels. Each five-hour training session includes:

- a guided tour of the Museum's Permanent Exhibition
- a discussion led by Museum educators on the role of police within the Nazi state
- an interactive examination of the role of police in American society today

## **2. Purpose and Use of the Information**

The purpose of the proposed data collection is to gather feedback from FBI National Academy students about their guided tour led by LEAS. The results will help determine if the LEAS is meeting its goals and objectives to enhance the program to better serve future law enforcement professionals participating in the FBI National Academy. In addition, the proposed data collection will be used to ensure the presentations and educational material is current and applicable.

**3. Use of Automated, Electronic, Mechanical or Technological Collection of Techniques**

To the extent possible, all data collection will be conducted through the Internet. The data collection plan calls for FBI National Academy students to be contacted via email to inform them of the existence and purpose of the questionnaire. Therefore, all activities associated with this data collection involve information technology. The decision was made to use these methods to make it as easy as possible for all respondents to participate. If any student prefers to complete a paper version of the questionnaire, they will be allowed to request one via email. We anticipate this option will be selected infrequently.

**4. Efforts to Identify Duplication**

Given the unique nature of the FBI National Academy's program, efforts are possible only by questioning students. No other sources are available or viable for this purpose.

**5. Impact on Small Business**

The collection of information will not have an impact on small businesses.

**6. Consequences of not Collecting Data**

The changing nature of the law enforcement profession presents the possibility that additional presentations and educational materials may be needed; otherwise, the content could become less worthwhile to the law enforcement community. Without this data collection, USHMM will be unable to determine if their program is current and applicable.

**7. Special Circumstances**

- (a) Respondents will not be required to report information more than quarterly.
- (b) Although open-ended responses will be included in the questionnaire, most questions are in multiple-choice format. Those questions that do require a written response are intended to elicit brief comments or recommendations related to the Law Enforcement and Society program and United States Holocaust Memorial Museum content. We will be asking students to respond in two weeks or less, which could be extended if necessary. We feel the nature of the written responses is such that this will not inflict undue burden. This is especially true since all input will be gathered via the Internet.
- (c) Respondents will not be required to submit documentation of any kind with their completed questionnaires.
- (d) Respondents will not be required to retain records of any kind as part of this data collection.

(e) All students who attend a ten-week training session at the FBI National Academy, approximately 1,000 law enforcement professionals annually, will be questioned.

(f) No statistical data classification is required.

(g) The proposed questionnaire does not include a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

(h) Respondents are not required to submit proprietary trade secrets or other confidential information.

## **8. Outside Consultation**

Consultation was conducted with the program manager of the Law Enforcement and Society and with personnel of the FBI's Training Division. The feedback was utilized to tailor the questionnaires to meet the needs of the students.

## **9. Payment to Respondents**

No payment or gifts will be offered to respondents.

## **10. Assurance of Confidentiality**

All respondents will be assured of confidentiality under Public Law 93-573 (Privacy Act of 1974). They will be assured that individual data will not be released, and that only aggregate data will be reported. Limited demographic information will be collected, allowing no possibility of identifying individual respondents.

## **11. Justification for Sensitive Questions**

This data collection includes no questions of a sensitive nature.

## **12. Estimates of Hour Burden**

Approximately 1,000 FBI National Academy students per year will be sent the questionnaire (this number is based on appropriate number of students from fiscal years 2013 -2014). Average time to complete the questionnaire will be 15 minutes. Though we would like 100% response rate, we anticipate a 75% response rate of those surveyed (or 750); with 25 % of the students not responding to the questionnaire.

## **13. Estimates of Cost Burden**

No equipment, software, systems, or technology will be purchased to support this effort. Completing the questionnaire will have no monetary cost on the respondents.

Salary costs - Because respondents occupy a variety of positions within law enforcement agencies, an average of the upper limit salaries from the following classifications were used to represent wage rate: detectives/criminal investigators, police and detective supervisors, grade 14/15 FBI special agents, police chiefs, deputy police chiefs, and police captains. The average annual salary came to \$102,585. Given a yearly total of 2,080 hours on the job, the average hourly salary comes to \$49.32. The total estimated time to complete this questionnaire per respondent is approximately 15 minutes. Thus, the calculated costs associated with this effort are \$12.33 per respondent. For 750 expected respondents, the total salary cost burden is \$9,247.50. Wage rate data was obtained from the Department of Labor.<sup>1</sup>

#### **14. Estimates of Annualized Cost to the Federal Government**

This is a collection that will be offered four-times a year. Costs outlined in Section 13 represent the total annual cost of this project.

#### **15. Reasons for Program Changes**

There are no program changes or adjustments in the estimate of hour burden.

#### **16. Plans for Tabulation and Publication**

The USHMM will produce a report summarizing the background, methodology, and results each time the questionnaire is sent out. Results will be averaged and used to determine if the educational program is applicable to the FBI National Academy. All answers are anonymous and will be included in the larger data set from all groups surveyed. At this time it is anticipated that the following data summaries will be provided:

- Charts showing the summation of all the quantitative items on the questionnaires.
- Compilation of the responses to each of the close-ended items.

At this time, it is not anticipated that complex statistical issues will emerge.

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<sup>1</sup> U.S. Department of Labor (2010-11). *Occupational Outlook Handbook*. Retrieved February 22, 2012, from <http://www.bls.gov/oco/ocos160.htm>

**17. Request for Approval not to display OMB  
Expiration Date**

The expiration date for OMB approval number will be displayed.

**18. Exceptions to the Certification Statement**

No exceptions to the certification statement are requested.

## **B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

**Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

### **1. Describe the procedures for the collection of information including:**

- Statistical methodology for stratification and sample selection.
- Estimation procedure.
- Degree of accuracy needed for the purpose described in the justification.
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The FBI National Academy offers a 10-week training program on a quarterly basis. Approximately 1,000 law enforcement professionals attend the training program each year. These law enforcement professionals represent state and local police and sheriff's departments, military police organizations and federal law enforcement agencies from the United States and over 150 foreign nations. The FBI Training Division will invite all FBI National Academy students who attended the guided tour at the United States Holocaust Museum led by the Law Enforcement and Society to complete the questionnaire. Six months after the each FBI National Academy graduation, an invitation is e-mailed to all students. The e-mail message will include the link directing all them to the questionnaire. The questionnaire will include a description of its goal and the purposes to why the data is being collected. The questionnaires will also explain to the students that their participation is completely anonymous.

After completing the questionnaire, the students will be instructed to select "submit" in order to record their responses. Because all FBI National Academy students will be offered the opportunity to participate in the questionnaire, the questionnaire does not involve any sampling, methods for stratification, imputations or similar statistical methods.

### **2. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification**

**must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

To ensure a high response rate, several measures have been put into place. For numerical data collection an electronic application, Key Survey, will be used to calculate simple totals, percentages, and cumulative percentages. Key Survey will also capture student comments entered in response to open-ended questions. The questionnaire will focus strictly on those issues of great interest in order to keep it as short as possible while still accomplishing the goals of the questionnaire. By offering the questionnaire online, we reduce the level of effort needed to complete it, as well as the steps involved in creating the database for analysis. Response rates will also be maximized by e-mail reminders which are sent out automatically by the Key Survey application, five days after the questionnaire has been sent. Finally, by including all students, we feel confident that the resulting data will reflect the experience of a wide range of respondents, including the full variety of law enforcement agencies and personnel levels. It is the understanding of the students that by completing these evaluations they will help the USHMM determine the strengths and weaknesses of their existing program.

**3. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

USHMM and an independent research firm, Slover Linett Audience Research that serves cultural nonprofits organizations developed this questionnaire form included as part of this package. A thorough review of the content centered on several issues, including:

- clarity of instructions
- ease with which information requested can be provided
- length of the instrument
- quality of the resulting data in terms of how it can be used to answer the questions of interest

When the draft instrument was approved internal tests were run to ensure functionality. After a thorough check, a sample of students was asked to complete the online questionnaire. Each respondent was interviewed afterwards to determine whether they had any problems completing the questionnaire and to get their input on changes that might clarify its content. Only minor wording changes were suggested and implemented.



**4. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

The following individual were consulted regarding the statistical aspects of the project:

Keith Shirley  
Unit Chief, Evaluation and Accreditation Unit  
FBI Training Division  
703-632-3025

Sarah Campbell  
Program Coordinator  
Law, Justice, and Society Initiatives  
United States Holocaust Memorial Museum  
202-488-0458

The persons who will be involved in collecting and analyzing the questionnaire data:

Laleatha B. Goode  
Management Program Analyst  
Evaluation and Accreditation Unit  
FBI Training Division  
703-632-3495

Sarah Campbell  
Program Coordinator  
Law, Justice, and Society Initiatives  
United States Holocaust Memorial Museum  
202-488-0458