

SUPPORTING STATEMENT

Updated October 25, 2015

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. The COPS Office has provided funding for this program to ICF International (ICF) to develop a community policing 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 (Community Policing Self-Assessment Tool, or CP-SAT) for use by law enforcement agencies, and under a previously approved collection we have made it available for use by law enforcement agencies that receive a COPS Office hiring grant.

2. Needs and Uses

The COPS Office awarded ICF International funding through cooperative agreement vehicles 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 administration of a tool that will allow law enforcement agencies to gain better insight into the depth and breadth of their community policing activities. This tool is designed to operationalize community policing at various levels of the agency: the officer level, the supervisor level, the command staff level, the civilian employee level, and the community partner level. There are three sections to the tool: 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.

Testing and refinement of the CP-SAT involved working directly with eight test site agencies to finalize the online version and to ensure that the supplemental materials provide effective instruction for administering the online version of the CP-SAT. Since the online CP-SAT was finalized, the COPS Office has sponsored approximately 575 hiring grantees to administer the

CP-SAT in their agencies as a grant requirement twice during their grant period. ICF offers assistance to work with these agencies to provide technical assistance, and survey administration and analysis support.

Under this new request, ICF International will continue to administer the CP-SAT to future COPS hiring grantees as a grant requirement. These agencies are expected to complete the survey twice during their award period, which will take place between Summer 2016 and Fall 2019. This new PRA request pertains to the approximately 1,150 survey process administrations for agencies that will administer the CP-SAT free of charge.

After an agency completes their CP-SAT administration period, ICF generates a summary report that is emailed to the Chief Executive Officer of the agency and the self-assessment point of contact. This report summarizes their self-assessment results and provides benchmark data in a user-friendly format. Participating agencies receive the CP-SAT Results Report after their 1st administration and the CP-SAT 2nd Administration Results Report after their 2nd administration.

Participation in the CP-SAT continues to be a mandatory grant requirement for our COPS Hiring Program (CHP) 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, 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 or other private entities.

6. Consequences of Less Frequent Collection

A less frequent collection or fewer respondents would not allow sufficient information to perform the appropriate agency 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

There are no inconsistencies with 5 CFR 1230.6

9. Payment or Gift to Respondents

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

10. Assurance of Confidentiality

The COPS Office is committed to protecting the confidentiality of individual respondents. No individual identifiers are collected and survey responses will only be reported in aggregate form. Furthermore, the third-party provider (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 Verint EFM Community Web-based survey software. Verint's survey hosting environment has been designed with security as a foremost consideration, with features such as 128 bit SSL encryption and redundant firewalls. Responses to the assessment are anonymous. There are no individual identifiers in the data and there is no way to link an individual's data to their name or email address. Participants will be invited to participate by sending the survey link via email. 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 survey. All data exported from the Verint secure Web site will be kept in a secured folder.

To ensure that the data distributed to participating agencies does not compromise respondent confidentiality, agencies must have at least three participant responses for a given item or set of items in order for the summary data to be displayed on the agency report. If only certain items, subsections, or sections have less than three responses, summary data is provided for all of the report with the exception of those specific sections, subsections, or items with fewer than three responses. If multiple respondent types (e.g., command staff, line officers) each have fewer than three respondents, data from those respondents are not segmented and presented, but rather they are only included with the rest of the respondent types as aggregate findings. These confidentiality protections do not apply to very small agencies with four or fewer sworn staff; the administration process for very small agencies is described next.

Note that the CP-SAT provider cannot protect respondent confidentiality while delivering agency results in very small agencies under the standard survey administration process. To address this, agencies with sworn force levels of four or fewer will be instructed to complete the survey as a

group. They will receive specific instructions in how this should occur, along with a reminder that the confidentiality of individual responses will not be protected under this process. Moreover, an individual review of several data items for these agencies will occur to add additional verification that they followed the instructions to complete the survey as a group. This small-agency modified process will ensure that the agency will receive a report summarizing their results, which would not be possible if the surveys were completed independently.

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 Burden¹

The CP-SAT is a resource that will be administered by COPS hiring grantees as a condition of their grant award. 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 hours for each administration (see chart in Section 13 below).

Total Hour Burden for collection instrument: 15 minutes per respondent and total time burden across the two administrations is estimated to be 5,241 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.

In developing salary estimates, 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 \$27.31² and \$38.91³ 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

1 The COPS provider completed usability tests - internally and externally- prior to the full administration of the CP SAT survey. The usability tests indicated that the response time was close to 15 minutes. However, the average time indicated by the respondent agencies was much less than 15 minutes. Because the internal tests were closer to 15 minutes, we provided an estimate of 15 minutes for Summary Statement A as in order to prevent an underestimation of time required to complete the survey in the instructions.

2 US Bureau of Labor Statistics Division of Occupational Employment, 33-3051 *Police Sheriff's Patrol Officers*, <http://www.bls.gov/oes/current/oes333051.htm> (May 2014)

3 US Bureau of Labor Statistics Division of Occupational Employment, 33-1012 *First-line Supervisors/ Managers of Police and Detectives*, <http://www.bls.gov/oes/current/oes331012.htm> (May 2014)

using a mean hourly wage of \$29.63 and the 15 minute cost of burden at \$7.41. Given the figures for Total Time Burden, the estimated Salary-based Total Cost of Burden across all agencies covered under this request is \$19,417.91 per administration and \$38,835.81 for both administrations.

Time and Cost Burden Estimates for One Administration of the CPSAT

A. Population Served	B. Total # Survey Process Administrations (450 grantees x 2 survey process administrations per agency)	C. Average # of Officers per Agency	D. % of Officers per Agency Taking CP-SAT	E. # of Officers taking CP-SAT = Time Burden per Agency (C x D)	F. Total # of Officers Taking CP-SAT (B x E)	G. Total Time Burden (F x .25 ⁴)	H. Total Salary-based Cost of Burden ⁵ (G x \$7.41)
250,000+	4	2,150	20%	430	1,720	430	\$3,186.30
100,000-249,999	16	290	80%	232	3,712	928	\$6,876.48
50,000-99,999	36	121	80%	97	3,492	873	\$6,468.93
25,000-49,999	66	63	80%	50	3,300	825	\$6,113.25
10,000-24,999	148	31	80%	25	3,700	925	\$6,854.25
<10,000	630	10	80%	8	5,040	1,260	\$9,336.60
Total	900				20,964 (Sum of F.)	5,241	\$38,835.81 (Sum of G.)

Total Salary-based Cost of Burden is estimated to be \$38,835.81.

14. Estimated Annualized Cost to Federal Government

The COPS Office has partnered with a third-party provider to administer this process. The estimated annualized cost is \$200,000.

15. Reason for Change in Burden

This request is to update a previously-approved collection, and therefore we are not requesting an increase in burden for an individual respondent.

16. Publication

4 Number of officers (F) is multiplied by .25 to account for the 15 minutes maximum it takes each participant to complete the CP-SAT.

5⁴ <http://www.bls.gov/OES> (May 2014)

The COPS Office and ICF International have developed a series of resources that reside on the COPS Office grantee website, which are designed to provide background information, instructions, and relevant community policing publications. This information assists local law enforcement agencies in implementing the survey,

Information about the resource and about the development experience will be reported on the website and will also be submitted to police-related journals and magazines, as well as professional conferences. Each individual agency that meets an 80% response rate at the conclusion of their CP-SAT administration period will receive a report summarizing their results, which is emailed to the Chief Executive Officer of the agency and the self-assessment point of contact. This report summarizes their self-assessment results and provides benchmark data in a user-friendly format. Participating agencies receive the CP-SAT Results Report after their 1st administration and the CP-SAT 2nd Administration Results Report after their 2nd administration.

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.