

Supporting Statement for Paperwork Reduction Act Submissions
Request for a new data collection with an OMB control number for the Law Enforcement
Suicide Data Collection (LESDC)

OMB Control #: N/A (New Data Collection)

Part A. Justification

1. Necessity of Information:

On June 16, 2020, the United States Congress passed the *Law Enforcement Suicide Data Collection Act (LESDCA)* (Title 34, United States Code, Section (§) 50701). This law mandates “the Attorney General, acting through the Director of the Federal Bureau of Investigation (FBI), shall establish, for the purpose of preventing future law enforcement suicides and attempted suicides, and promoting understanding of suicide in law enforcement, the Law Enforcement Officers Suicide Data Collection, under which law enforcement agencies may submit to the Director of the FBI information on suicides and attempted suicides within such law enforcement agencies . . .”

The LESDC has been in development since the passing of the *LESDCA* in 2020. The FBI Uniform Crime Reporting (UCR) Program established a task force of subject matter experts (SMEs) and law enforcement personnel to advise and provide recommendations on collection decisions and methodology throughout the development process. Major milestones of the LESDC were also presented to the FBI Criminal Justice Information Services (CJIS) Advisory Process to receive feedback from law enforcement SMEs from across the United States.

2. Needs and Uses:

The LESDC is designed to provide data on incidences of suicide and attempted suicides within the law enforcement community. The LESDC will collect a required list of attributes related to suicides and attempted suicides, including

1. the circumstances and events that occurred before each suicide or attempted suicide
2. the general location of each suicide or attempted suicide
3. the demographic information of each law enforcement officer who commits or attempts suicide
4. the occupational category, including criminal investigator, corrections officer, line of duty officer, 911 dispatch operator, of each law enforcement officer who commits or attempts suicide
5. the method used in each suicide or attempted suicide

The LESDC questionnaire is comprised of five sections which focus on collecting the above requirements, along with additional data elements that are relevant to a suicide or attempted suicide incident. These sections are:

- Administrative agency data
- Demographic data on the subject
- General data on the incident
- Circumstance data on the incident
- Agency training and wellness information

Data from the LESDC will be used to produce a report of information about suicide and attempted suicide within the law enforcement community and help to promote understanding into these occurrences. This data will help further the discussion within society around law enforcement suicide and attempted suicide.

The primary customers of LESDC data will be law enforcement agencies (LEAs) and organizations interested in the research and analysis of suicides and attempted suicides in the law enforcement community. Each section of the LESDC is designed to not only fulfill the requirements of the congressional mandate but provide added utility in understanding the details surrounding these incident(s).

3. Use of Technology:

The LESDC provides a centralized repository for the responsible law enforcement agency representatives to submit data on the circumstances, demographics, and details involved in a suicide or attempted suicide incident. The Collection of Law Enforcement and Crime Tool (COLECT) is a robust application that will enable the nation's law enforcement agencies to submit LESDC incident information to the FBI UCR Program. The COLECT has been created to allow agencies the use of an FBI-developed interface to submit and manage their agency's submissions to the FBI UCR program, including participation in the LESDC. Detailed information about these and other features are included within this document.

All users access the COLECT through the FBI's Law Enforcement Enterprise Portal (LEEP). COLECT uses the LEEP for authentication and the related user account to provide access to information and functionality within the software.

4. Efforts to Identify Duplication:

The FBI UCR Program worked with the LESDC task force to identify potential areas of duplication for this collection. However, the study of suicide and attempted suicide among the law enforcement community is a relatively new area of research. Collections regarding suicide were found in various aspects of specific demographics, such as for the military or general populace, but none are comparable to the requirements as established within the *LESDCA*. No collections were identified supporting the collection of attempted suicide within any demographic established within the Act.

In the development of the LESDC, the FBI UCR Program worked closely with the non-government group Blue H.E.L.P. (Honor. Educate. Lead. Prevent.). Blue H.E.L.P. is a non-

profit organization working to collect data on law enforcement officers who commit suicide and support the families of the law enforcement officer. While Blue H.E.L.P is not a federal or state collection, there are major differences between the Blue H.E.L.P data collection and the LESDC. First, Blue H.E.L.P collects data from both the families and the employing law enforcement agency of the law enforcement officer. Blue H.E.L.P. also provides a mission statement for the collection to “Reduce mental health stigma through education, advocate for benefits for those suffering from post-traumatic stress, acknowledge the service and sacrifice of the law enforcement officers in search for healing and bring awareness to suicide and mental health” and conducts outreach to the families after learning about the incident.

As mandated in the *LESDCA*, the LESDC collects directly from LEAs. The FBI will be collecting such information from LEAs through the LEEP and the COLECT platform. No outreach is conducted to the family of the subjects and no personal information on the family is collected. Second, due to the requirements of the *LESDCA*, the scope of the LESDC expands beyond the traditional definition of a LEO recently utilized by Blue H.E.L.P, which only included LEOs belonging to police departments. The LESDC includes employees of correctional agencies, telecommunicators (911 operators), and criminal prosecutors and adjudicators. Blue HELP recently expanded their collection scope to include suicides from all first responders (Fire, EMS, Dispatch, Police, and Corrections). This aligns Blue HELP and the LESDC considerably, but the differences in collection participation and the absences of adjudicators limits risk of duplication. More information on the scope and respondent universe for the LESDC will be provided later in this document.

5. Methods to Minimize Burden on Small entities:

To mitigate potential burden on all participating entities, the FBI has built the COLECT as a web portal which will serve as a platform to access the LESDC application. Also, based on research conducted with the LESDC task force, to include a representative of Blue H.E.L.P, the frequency at which any one law enforcement agency will experience multiple law enforcement suicides or attempted suicides remains low. Thus, it is not anticipated that the volume of suicides or attempted suicides will create a large burden on any small entities.

6. Consequences of Less Frequent Collection:

Not Applicable. Collection is required by congressional mandate, which requires an annual publication.

7. Special Circumstances Influencing Collection:

The LESDC is congressionally mandated by the *LESDCA*. Collection and distribution of this collection is a legal requirement. The FBI UCR Program is required to provide a yearly report to Congress and the public on LESDC progress and information containing the aspects required by law. Not collecting and distributing, or collection and distributing on a less frequent basis would be a violation of the *LESDCA*.

The FBI UCR Program is requesting that law enforcement agencies submit information on an incident-by-incident basis. This means that agencies will submit an incident of suicide or attempted suicide after the incident has occurred. Participation in the LESDC is voluntary and law enforcement agencies are under no requirement to submit information concerning suicide or attempted suicides within its law enforcement agency.

8. Public Comments and Consultations:

The 60- and 30-day notices were published in the *Federal Register*; no public comments were received on this data collection.

9. Payment of Gift to Claimants:

Not applicable.

10. Assurance of Confidentiality:

The FBI UCR Program does not traditionally assure confidentiality. However, the *LESDCA* addresses the issue within the statute. The legislation states, in paragraph (d) “CONFIDENTIALITY.—The report described under subsection (c) may not include any personally identifiable information of a law enforcement officer who commits or attempts suicide.” To ensure the highest level of privacy, the LESDC does not collect directly identifiable information about officers who commit or attempt suicide. All publication of LESDC information will be designed to limit the ability to indirectly identify law enforcement officers who commit or attempt to commit suicide.

The FBI has completed a Privacy Impact Assessment (PIA) which identifies privacy risks and mitigations pertinent to this collection. The PIA has been approved by the US Department of Justice and published on fbi.gov.

11. Justification for Sensitive Questions:

Not Applicable

12. Estimate of Hour Burden:

Due to the inability to accurately measure the total population of eligible law enforcement agencies included in the expanded scope of the LESDC, providing a calculated burden estimate based on total number of potential responses is impossible at this time. However, the FBI UCR Program has collaborated with Blue H.E.L.P. as part of the LESDC task force and can use their collected data to estimate an expected response number for calculating annual burden. In 2020, Blue H.E.L.P. reported 174 suicides deaths of law enforcement officers. In 2019, this number was 238 suicide deaths of law enforcement officers. Based on the volume reported by Blue H.E.L.P. and accounting for the expanded scope of the LESDC compared to the collection frame of Blue H.E.L.P, it can be estimated the LESDC could reasonably expect to receive an estimated

300 responses of suicides or attempted suicides from the law enforcement demographic on an annual basis. An assessment of reasonable estimates for the additional demographics to include corrections, legal system, and telecommunications is unavailable.

Based on useability assessment and testing, the FBI UCR Program anticipates an average of 25-30 minutes of burden response submitted for the LESDC. This is based on responses received during the pilot and any internal testing procedures. Below is a calculation of the estimated burden using a response time of 30 minutes.

Total annual responses:	300 responses
Time per response:	30 minutes
Annual burden:	150 hours

As the LESDC is a new collection and the FBI UCR Program is still assessing the full scope of the potential respondent population, it is anticipated that further work and outreach will be necessary for this collection. This will include communication with potential respondents and additional discussions with state representatives and task force members. To allow for this outreach, an additional 300 burden hours is anticipated to continue improving the LESDC.

Annual Response Burden:	150 hours
Additional Outreach Burden:	300 hours
Total Annual Burden:	450hours

Total requested annual burden hours: 450 hours

13. Estimate of Cost Burden:

There are no direct costs to law enforcement to participate in the FBI UCR Program other than the time to respond to the data collection questions, and for any additional follow-up between the agency and the FBI UCR Program. Respondents may incur capital or start-up costs associated with this information collection, although it is difficult to obtain the costs from agency-to-agency.

14. Cost to Federal Government:

Below is a FY2020 cost break down for the FBI UCR Program provided by FBI Financial Management staff.

Data Collection and Processing Costs

Activity	FY2020 Annualized Cost	FY2020 Annualized FTE
Conduct Assessment / Perform Analysis	\$ 91,640.91	0.45
Conduct Liaison, Education, and Promotion	\$ 460,753.01	3.56

Conduct UCR Audits	\$ 473,855.85	3.74
Define and oversee Compliance within IT infrastructure	\$ 40,363.87	0.30

Data Collection and Processing Costs

Activity	FY2020 Annualized Cost	FY2020 Annualized FTE
Deliver Curriculum - External Customer	\$ 167,469.21	1.17
Deliver Curriculum - External Customers	\$ 226,131.47	0.91
Develop and Manage Policy	\$ 357,738.77	2.86
Develop Curriculum - External Customer	\$ 167,469.21	1.17
Develop Curriculum - External Customers	\$ 233,860.67	1.13
Manage Projects	\$ 136,428.30	0.76
Perform Administrative and Human Resource Tasks	\$ 812,853.40	6.57
Perform Advisory Policy Board (APB) Tasks	\$ 206,528.50	1.53
Perform and Oversee IT Service Management Activities	\$ 94,125.20	0.66
Perform Budget, Strategic Planning, and Program Control	\$ 273,102.44	1.77
Perform Duties as the Agile Product Owner	\$ 424,564.99	3.31
Perform IT Finance Functions	\$ 35,267.21	0.17
Perform Organization IT Management and Strategic Planning	\$ 30,617.56	0.18
Perform Other Agile Duties	\$ 258,005.53	1.72
Perform Research and Analysis	\$ 248,981.39	1.44
Perform the Client Management Function	\$ 103,171.04	0.65
Produce Publications	\$ 101,532.52	0.70
Provide and Administer Databases and Database Services	\$ 163,856.22	1.01
Provide and Administer Middleware Services	\$ 120,329.50	0.94
Provide and Maintain Servers	\$ 54,086.46	0.41
Provide and Maintain UNIX Operating Systems	\$ 27,370.28	0.23
Provide Application Development Services	\$ 687,257.21	4.79
Provide Application Support and Operations Services	\$ 111,365.30	0.84
Provide Editing Services/Support	\$ 201,792.18	1.20
Provide Supervisory Review/Oversight	\$ 35,091.60	0.18
Provide Writing Services/Support	\$ 179,656.15	1.07
Support and Manage IT Programs, Product Initiatives	\$ 344,140.46	2.45
Support CJIS Advisory Policy Board	\$ 26,661.76	0.20
Support the <i>Crime in the United States</i> Publication	\$ 1,051,706.87	9.04
Support the FBI's Crime Data Explorer (CDE)	\$ 92,448.35	0.61
Support the <i>Hate Crimes Statistics</i> Publication	\$ 440,587.35	3.58
Support the <i>LEOKA</i> Publication	\$ 422,069.73	3.49
Support the National Use-of-Force Data Collection	\$ 176,977.21	1.42
Total	\$ 9,115,124.89	66.38

15. Reasons for Change in Burden:

Not applicable. This is a new program.

16. Plans for Publication:

The *LES DCA* requires that LESDC information be provided via a report to Congress at an annual cadence and made available for public consumption. For the first year of collection, available information must be provided to Congress on June 16, 2022. After this report, LESDC information must be provided in an annual report for each subsequent year. The FBI UCR Program plans to publish an annual report of information from a given year during the following calendar year.

Due to the expanded scope and the nontraditional definitions provided by the *LES DCA*, the scope of the LESDC consists of agencies not normally counted among LEAs by the FBI UCR Program. This has presented a challenge in accurately measuring the total population of potential agencies and participation percentage. To allow for adequate time to evaluate reported data and ensure proper interpretation of LESDC data, the FBI UCR Program plans to represent LESDC publications as simple reports of submitted information and not as statistical findings that are representative of the population. Information collected as part of the LESDC will be published on traditional UCR platforms, such as the CDE. However, the FBI UCR program will provide extensive messaging on the CDE to ensure proper interpretation of LESDC information as nonstatistical reporting. This will help differentiate between UCR statistical data collection and publications and the LESDC on the CDE.

Evaluation of participation and population coverage will be an area of research and analysis for the future of the LESDC. The need for a study focused on the total population coverage and potential nonresponse will be evaluated after sufficient data has been collected to provide a clearer picture of the available data that exists within the LESDC scope.

17. Expiration Date Approval:

The FBI does not want to display the expiration date for OMB approval of the information collection due to the mode of data collection. The LESDC will be collected via web form available on COLECT through the restricted-access LEEP. To keep an expiration date current would require programming changes on the web form.

18. Exceptions to the Certification Statement:

Not applicable