

Supporting Statement A for FBI Training Generic Clearance

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The FBI conducts formal training and education programs in support of our state, local, tribal and foreign law enforcement partners. In order to ensure the success of these programs, the FBI requires direct feedback on how well these programs are benefiting the students. Training programs are similar to but not limited to the following:]

National Academy (NA)

The Federal Bureau of Investigations (FBI) NA was created in response to a 1930 study released by the National Committee on Law Observation and Enforcement. This body was appointed by Hebert Hoover to study causes of criminal activity (largely related to prohibition) and make recommendations regarding appropriate national policy responses. One of those recommendations 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 NA 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." To meet this mission, the FBI NA offers a quarterly 10-week program including undergraduate and graduate courses at their campus, at the FBI Academy, Quantico, Virginia. The subject areas include law, behavioral science, forensic science, leadership development, communication, and health and fitness.

National Executive Institute (NEI)

In 1974, the FBI was asked to develop a program that would foster leadership and professional partnerships among senior LE employees of major cities that consisted of more than 500 LE employees. In response, the FBI initiate the NEI.

The NEI is designed for chiefs and sheriffs who lead these large LE organizations. The NEI provides strategic leadership development, and inter-agency liaison at the highest level of the FBI, U.S. law enforcement agencies, and international law enforcement agencies. The NEI works collaboratively with the major city's chiefs, the major county sheriffs, and the NEI Associates. The NEI is a strong conduit for domestic, international, government, and private industry collaboration.

Law Enforcement Executive Development Seminar (LEEDS)

After NEI was established there was an identified need to ensure that smaller city, senior LE employees, were assured the same level of leadership and professional partnerships as those of the larger cities. In response, the FBI established LEEDS in 1981.

LEEDS seminar provides instruction on management, leadership, strategic planning, labor relations, media relations, social issues, and police programs to attending law enforcement executives. LEEDS is designed for the chief executive officers of mid-sized law enforcement agencies employing 50 – 499 sworn law enforcement personnel and serves a community with a population of at least 50,000.

Attendance in these FBI programs allows law enforcement professionals the opportunity to network, share ideas, and learn from their various experiences. Participation is by invitation only and is implemented through a supervisory nomination process. Attendees represent state and local police and sheriffs' departments, military police organizations, and federal law enforcement from the United States and over 150 foreign nations.

This data collection is justified under 5 U.S.C. 410.601(f) (Office of Personnel Management, Training, Evaluation of Training). This section reads as follows:

Under provisions of chapter 41 of title 5, United States Code, and Executive Order 11348, the agency head shall evaluate training to determine how well it meets short and long-range program needs by occupations, organizations, or other appropriate groups. The agency head may conduct the evaluation in the manner or frequency he or she considers appropriate.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The purpose of the proposed generic data collection from these evaluations is to gather feedback from respondents about their courses, instructors, and their overall experience during the FBI training. The results are used to help determine if FBI training programs are functioning as intended and meeting the intended goals and objectives.

Instructor or Presenter Questionnaire

The information collected from either an instructor or presenter questionnaire will determine the strengths and weaknesses of the individuals delivering the FBI training. Information received will aid in the FBI developing professionals who are responsible for making these training programs successful. The respondents are the best source for obtaining relevant feedback on the quality of the instruction at the FBI and how the instruction either hindered or aided their learning. This questionnaire represents the most cost-effective method for allowing the respondents to provide such feedback and, as a result, create the opportunity for improvements to FBI training programs to benefit future participants.

Course Questionnaire

The information collected from the course questionnaire will determine the quality of the content being delivered. Information received will be used to ensure the content is relevant to today's LE members and help identify future topics for inclusion into the programs. The respondents are the best source for obtaining relevant feedback on the quality of the content being delivered in these programs at the FBI and for ensuring the content supports their job role. This questionnaire represents the most cost-effective method for allowing the respondents to provide such feedback and, as a result, create the opportunity for improvements to FBI training programs to benefit future participants.

General Questionnaire

The information collected from the general questionnaire will determine how the FBI can improve the respondents overall experience and learning environment during their stay at the FBI Academy or in the FBI training venue. This will be accomplished by assessing respondents' views of the FBI's facilities, programs, and resources. In addition, address improvements or alterations that can be used to make learning more enjoyable for future respondents attending these programs. The respondents are the best source for obtaining feedback on how this experience has affected them and their learning environment. This questionnaire represents the most cost-effective method to provide such feedback and, as a result, create the opportunity for improvements for these programs by the FBI.

Focus Group

When necessary, information collected from Focus Groups will be used to determine if timely and relevant feedback on if the training continues to provide relevant information which can assist the students in their job roles. This technique will use similar mentioned questions used in the different questionnaires listed above. Focus Groups are conducted during the training setting and are therefore a cost effective method and will allow FBI staff to engage the students in person to obtain the instructor and course feedback.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

To the extent possible, all data collection will be conducted via the Internet. The data collection plan calls for respondents to be notified of the existence and purpose for these questionnaires. Respondents may be contacted via email, select a link on a Learning Management System, or scan a bar code in order to access these questionnaires. 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 respondents prefer to

complete a paper version of the evaluation, they will be allowed to request one via email. We anticipate this option will be selected infrequently.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

Given the unique nature of continually improving education and training, efforts are only possible by seeking the opinions from the respondents of these FBI training and education programs. No other sources are available or viable for this purpose.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There is no significant impact on small business or other private entities.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The content of these FBI programs and the way they are conveyed have been carefully designed to address the organization's mission. The changing nature of law enforcement presents the possibility that additional content may be needed, otherwise content has become less worthwhile to professionals in the field. These questionnaires will allow FBI personnel the ability to monitor the quality of delivery, the relevance of the content, and the distractions the learning environment can have in order to make necessary changes to these programs.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes 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; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-Day Notice was published in the Federal Register on March 29, 2023 (88 FR 18588). The comment period ended on May 30, 2023. No comments were received.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

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

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Confidentiality is not required in the processing of this information co

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Although rare, this data collection may include questions of a sensitive nature due to the potential sensitive nature of Law Enforcement techniques.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Training	8,250	1	8,250	10min	1,375	\$41.32	\$56,815
<i>Unduplicated Totals</i>	<i>8,250</i>		<i>8,250</i>		<i>1,375hrs</i>		<i>\$56,815</i>

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no startup costs associated with this collection. No equipment, software, systems, or technology will be purchased to support this effort. Completing these questionnaires will have no monetary cost on the respondents.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

The estimated cost to the federal government is \$86,780 (program support staff and overhead).

15. Explain the reasons for any program changes or adjustments.

The collection of information is revised to include two additional questions and formatting changes.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Using technology, of the EAU, CMS, TD will analyze the results of the questionnaires in order to provide these FBI training programs with a report summarizing the background, methodology, and results. The report will not be released to the public, but will be maintained in a database for use by FBI employees or FBI contract personnel to work to improve the training being delivered. At this time it is anticipated that the following data summaries will be provided:

- Statistical data showing the summation of all the quantitative items on the questionnaires.
- Compilation of the responses to each of the open-ended items.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are requesting no exemption.

18. Explain each exception to the certification statement.

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection contains statistical data.