

**SUPPORTING STATEMENT**  
**1110-0082**  
**LAW ENFORCEMENT SUICIDE DATA COLLECTION**

The FBI's Uniform Crime Reporting (UCR) Program requests a three-year extension of the Law Enforcement Suicide Data Collection (LESDC) for the purpose of receiving information regarding suicides and attempted suicides within the law enforcement community.

**Part A. Justification**

1. Necessity of Information:

On June 16, 2020, the United States Congress passed the *LESDC 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 Program, under which law enforcement agencies may submit to the Director [of the FBI] information on suicides and attempted suicides within such law enforcement agencies . . .”

Development of the LESDC began following the passing of the *LESDCA* in 2020. The FBI's 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's Criminal Justice Information Services (CJIS) Advisory Process to receive feedback from criminal justice and other 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 collects 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 (LEO) who commits or attempts suicide;
4. the occupational category, including criminal investigator, corrections officer, line of duty officer, 911 dispatch operator, of each LEO who commits or attempts suicide; and
5. the method used in each suicide or attempted suicide.

The LESDC questionnaire is comprised of five sections which focus on collecting the aforementioned 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 of these occurrences. The data will help further the discussion within society around law enforcement suicide and attempted suicide.

The primary customers of LESDC data are 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 the incident(s).

### 3. Use of Technology:

The LESDC provides a centralized repository for the responsible LEA 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 enables the nation's LEAs to submit LESDC incident information to the FBI's UCR Program. COLECT was created to allow agencies to use an FBI-developed interface to submit to, and manage their agency's submissions within, the FBI's 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 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's 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

*LES DCA*. 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's UCR Program worked closely with the non-government group Blue H.E.L.P. (Honor. Educate. Lead. Prevent) (BH). BH is a non-profit organization working to collect data on LEOs who commit suicide and support the families of LEOs. BH is not a federal or state collection and there are major differences between the BH data collection and the LESDC. First, BH collects data from both the families and the employing law enforcement agency of the LEO. BH 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 LEOs in search for healing and bring awareness to suicide and mental health" and conducts outreach to the families after learning about the incident.

In contrast, the LESDC collects directly from LEAs. First, the FBI will be collecting such information from LEAs through the COLECT platform on LEEP. 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 *LES DCA*, the scope of the LESDC expands beyond the traditional definition of a LEO recently utilized by BH, which only included those LEOs belonging to police departments. The LESDC includes employees of correctional agencies, telecommunicators (911 operators), and criminal prosecutors and adjudicators. BH recently expanded their collection scope to include suicides from all first responders (Fire, Emergency Medical Services, Dispatch, Police, and Corrections). This aligns BH and the LESDC considerably, but the differences in collection participation and the absence 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, which included a representative of BH, the frequency at which any one LEA will experience multiple law enforcement suicides or attempted suicides remains low. Therefore, 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 also requires an annual publication.

## 7. Special Circumstances Influencing Collection:

Under the LESDCA, the FBI's UCR Program is required to provide a yearly report to Congress and publish on the FBI's website LESDC information containing the aspects required by law. Not collecting and distributing, or collection and distributing on a less frequent basis, would be inconsistent with the *LESDCA*'s requirements.

The FBI's UCR Program is requesting that LEAs 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 FBI's UCR Program is voluntary, and LEAs are under no requirement to submit information concerning suicide or attempted suicides.

## 8. Public Comments and Consultations:

The 60- and 30-day notices for LESDC were published in the *Federal Register* and no public comments were received.

## 9. Payment of Gift to Claimants:

Not applicable.

## 10. Assurance of Confidentiality:

The FBI's UCR Program does not traditionally assure confidentiality. However, the *LESDCA* addresses the issue. 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 LEOs who commit or attempt to commit suicide.

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

## 11. Justification for Sensitive Questions:

Not applicable.

## 12. Estimate of Burden Hours:

Due to the inability to accurately measure the total population of eligible LEAs included in the expanded scope of the LESDC, providing a burden estimate based on total number of potential responses cannot be calculated at this time. Based on the annual volume reported to the FBI's UCR Program since the collection began, it is estimated the LESDC could reasonably expect to receive an estimated 50 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 submissions to the FBI's UCR Program's LESDC, 15 minutes is the average time required for LEAs to provide pertinent information for the collection.

As the LESDC is a relatively new collection and the FBI's 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. Therefore, the annual burden associated with this information collection is an estimated 312.5 hours. This includes 12.5 hours for LESDC and 300 additional hours for outreach.

<b>Total Annual Responses:</b>	50 responses
<b>Time per Response:</b>	15 minutes
<b>Annual Response Burden:</b>	12.5 hours
<b>Additional Outreach Burden:</b>	300 hours
<b>Total Annual Burden:</b>	312.5 hours

Total requested annual burden hours: 312.5 hours

## 13. Estimate of Cost Burden:

There are no direct costs to law enforcement to participate in the FBI's UCR Program other than the time to respond to the data collection questions, and for any additional follow-up actions between the agency and the FBI. 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 Fiscal Year (FY) 2023 cost breakdown for the FBI’s UCR Program as provided by CJIS Division financial management staff.

<b>Data Collection and Processing Costs</b>		
<b>Activities</b>	<b>FY2023 Annualized Cost</b>	<b>FY2023 Annualized FTE</b>
Conduct Liaison, Education, and Promotion	\$916,917.59	7.1
Conduct Research and Release Studies on Collected Data	\$243,082.15	2.1
Develop and Manage Policy	\$69,263.87	0.5
Perform Administrative and Human Resource Tasks	\$603,229.19	4.0
Perform Advisory Policy Board Tasks	\$194,194.00	1.5
Perform Budget, Strategic Planning, and Program Control	\$598,841.68	3.8
Perform Contracting Officer’s Representative Duties	\$58,386.55	0.3
Perform Scaled Agile Framework Duties	\$345,054.17	2.7
Planning and Implementing New Data Collections	\$175,895.37	1.7
Process Media, Freedom of Information Act, and Congressional requests	\$178,042.55	1.2
Provide Support to Other FBI Units/Sections (Temporary Duty, Surge)	\$9,128.15	0.1
Support <i>Crime in the United States</i> Data Release	\$165,419.04	1.3
Support Law Enforcement Employee Counts Data Collection	\$132,740.65	1.0
Support LESDC	\$200,837.28	1.8
Support Law Enforcement Officers Killed and Assaulted (LEOKA) Data Collection	\$243,811.88	2.2
Support the National Incident-Based Reporting System	\$285,340.64	2.2
Support National Use-of-Force Data Collection	\$208,387.15	1.8
Support the FBI’s CDE	\$106,852.68	0.8
Support the Hate Crime Data Collection and Data Release	\$156,367.49	1.2
Support the Quarterly Uniform Crime Report	\$121,320.92	0.9
<b>Total</b>	<b>\$5,013,113.00</b>	<b>38.2</b>

15. Reasons for Change in Burden:

When the LESDC was in the development stage, the FBI’s UCR Program collaborated with BH as part of the LESDC task force and used their collected data to estimate an expected response number for calculating annual burden. In 2019, there were 238 suicide deaths of LEOs. In 2020, the number reported by BH was 174. Based on the volume reported and accounting for the expanded scope of the LESDC, as compared to the BH collection, it was 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. Additionally, the FBI’s UCR Program anticipated an average of 25-30 minutes for LEAs to respond. An assessment of reasonable estimates for the additional demographics to include corrections, legal system, and telecommunications was unavailable.

However, based on responses received during the useability assessment, internal testing procedures, and the pilot, along with data submitted to the FBI’s UCR Program since the

inception of the LESDC, it has been estimated that 50 responses will be received, and an average of 15 minutes will be required to complete the report. Consequently, the burden for respondents has been reduced to an estimated 12.5 hours. The time for outreach remains at 300 hours for a total annual burden of 312.5 hours for the LESDC.

#### 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. The FBI's 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 required by the *LES DCA*, the scope of the LESDC consists of agencies not normally counted among LEAs by the FBI's 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's UCR Program plans to represent LESDC publications as 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 Crime Data Explorer (CDE). However, the FBI's 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 have been collected to provide a clearer picture of the available data that exists within the LESDC scope.

#### 17. Expiration Date Approval:

The FBI hesitates to provide an expiration date for Office of Management and Budget (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.