

B. Collection of Information Employing Statistical Methods

1. Universe and Respondent Selection

Defining the tribal law enforcement agency (LEA) universe

The 2025 Census of Tribal Law Enforcement Agencies (CTLEA) will collect data from tribally-operated LEAs that

- provide direct law enforcement services on tribal lands,
- are funded by a tribe,
- are responsible for maintaining public order and enforcing the law,
- are responsible for the detection and investigation of crimes and apprehension of criminals, and
- have general arrest powers or the authority to issue citations.

Authority for tribal LEAs is granted by federally recognized tribes through tribal constitutions, statutes or codes or by 638 compacts through the Bureau of Indian Affairs (BIA).¹ These tribal LE agencies include any and all tribal police departments and those agencies with special authority and/or functions operated by or on the behalf of tribal governments in Indian country, including conservation and wildlife agencies and tribal college or university police operating in Indian country.

The CTLEA will build upon the universe that was compiled for the 2019 CTLEA data collection. Several steps were taken to update the universe: 1) comparing the list of tribes to BIA's annual list of 575 federally recognized tribes, 2) contacting tribal leadership to review and update existing information on tribal LEAs, 3) scanning IACP's Indian Country Law Enforcement Section Roster and membership database, and lastly, 4) checking online sources or, in the event that the information could not be verified through other sources, contacting the tribe to ensure the most current and correct information is available.

Upon completing those steps, there were general categories of agencies that needed follow-up to determine eligibility. These included the following:

- **No Known Law Enforcement Agency** – Based on the universe sources listed above 345 tribes and Alaska Native Villages (ANVs) could not be confirmed to have a LE agency. For each of these tribes, a direct phone call and/or web research was conducted to determine if the tribe had a qualifying LE agency or if it was covered by state, local, or other tribal public safety services.
- **Conservation and wildlife agencies** – 43 tribal wildlife and conservation agencies were found through the various universe sources.
- **Alaska** – Alaska has one reservation and over 200 Alaska Native Villages (ANVs). Law enforcement services are provided to the ANVs by the State of Alaska through Village Public Safety Officers (VPSOs), a component of the Alaska State Troopers. Three tribal LE agencies serve reservation or Indian trust land in Alaska and both are included on the CTLEA universe list, in addition to the Alaska State Troopers. Through contact with the

¹ Title 25 U.S. Code § 2802 - Indian law enforcement responsibilities

Alaska State Troopers, it was determined that a central office would be able to complete the CTLEA survey on behalf of all VPSOs and was considered eligible to participate.

- **BIA** – The BIA Office of Justice Services, informed BJS that currently there are 24 BIA police agencies operating on tribal lands.

As a result of the updating process outlined above, 303 total LE agencies were identified as meeting the CTLEA eligibility criteria. The 279 tribal-government-operated agencies (including VPSO programs) provide services to a subset of the 575 federally recognized tribes. Ongoing updates to agency contact information will be incorporated into the universe list as new information is made publicly available by the tribes via website updates, by BIA, or through other public sources.

All eligible tribal police, conservation and wildlife offices, and tribal university or college police agencies will be surveyed. A breakdown of the 2025 CTLEA universe list can be found in Table 1.

Table 1. 2025 CTLEA universe of tribal LE agencies

Type of agency	Count	Percent of universe
CTLEA Universe	303	100%
<i>Tribal-Government-Operated Agencies</i>		
Tribal law enforcement agencies	230	76%
Conservation/Wildlife enforcement agencies	43	14%
Tribal university/college police	5	2%
<i>Federal and State operated agencies/programs</i>		
BIA Police agencies	24	8%
Alaska State Troopers	1	0.3%

2. Procedures for Collecting Information

The full data collection effort will include all **303** eligible agencies identified in the tribal LE agency universe list. The collection period for the CTLEA is 16 weeks, anticipated to begin in September 2026, pending OMB approval.

Based on the experience with cognitive testing, full data collection will be divided into four phases: *outreach and data collection; nonresponse follow-up; validation; and weighting for unit non-response and item imputation phases.*

Phase 1: Outreach and data collection for the Tribal Law Enforcement survey

- *Step 1. Outreach.* Prior to data collection, NORC and partner organization IACP will conduct outreach to tribal leadership and the tribal law enforcement community to inform them of the upcoming CTLEA data collection. This outreach will include speaking about the project at related conferences, distributing an informational flyer at related conferences (**Attachment G**), hosting an informational webinar about the project prior to the start of data collection, and emails to IACP’s Indian Country Law Enforcement Section (ICLES) membership. The informational webinar will be 60 minutes in length and entitled “Why Data Matters: Strengthening Tribal Policing Through Information, Evidence, and Collaboration” (**Attachment H**) prior to the data collection. All tribal agencies will be invited to the webinar, including tribal law enforcement agencies (CTLEA respondents). The webinar will focus on educating tribal agencies about why participation in federal data collections matter, how data will be used, and privacy protections. It will also emphasize how accurate census data supports resource allocation, funding, and policy development. The webinar will include interactive elements, including a Q&A session and testimonials from tribal representatives.
- *Step 2. Data collection start.* Following these outreach activities, data collection will commence. During week 1 of data collection, NORC will mail an invitation packet to all tribal-government-operated agencies and BIA police agencies via first class USPS mail. The questionnaire packet will contain the CTLEA agency invitation letter from the BJS director addressed to the LEAs (**Attachment I**), sample questions (**Attachment J**), CTLEA one page flyer (**Attachment K**) and a letter of support from IACP and their Indian Country Law Enforcement Section (**Attachment L**). Agencies will be invited to complete the web-programmed version of the 2025 CTLEA survey (**Attachment B**) and use the Question Guide (**Attachment F**) to facilitate completion of the web survey.
- *Step 2. Email invitation and follow up.* One week after the mail invitation is sent, a separate email invitation (**Attachment M**) will be sent to the best email address for each LEAs chief of police or general email address.
- *Step 3. Mail an invitation postcard.* A separate postcard mailing (**Attachment N**) will be sent to all non-responding agencies approximately two weeks after the invitation mailing is sent. The postcard mailing will include instructions to complete the online survey, as well as contact information for the project hotline and email address for assistance.
- *Step 4. Phone outreach and confirm receipt of invitation.* Starting at week four, phone outreach will be made by NORC and IACP staff to prompt participation in the survey. This outreach will also be used to confirm best contact information and update any contact information as necessary. On request, an additional mailed or emailed invitation packet will be sent to the LEAs. A copy of the confirmation script is included as **Attachment O**.

Phase 2. Nonresponse follow-up strategy for the Tribal Law Enforcement survey

- *Step 1. Reminder email prompts.* Five and seven weeks after the start of data collection, NORC will send reminder emails to the best-known email address for the chief of police or agency (**Attachment P**) to non-responding agencies. These emails will encourage non-responders to complete the web survey. Additional reminder emails may be sent out, if necessary, similar to email in **Attachment P**.
- *Step 2. Telephone prompt.* Ten weeks after the reminder postcard is mailed, NORC and IACP will conduct an additional round of telephone outreach to all non-responding agencies. This round of telephone calls will serve to determine progress on the survey, obtain an anticipated timeline for submission and encourage response. Telephone interviews will also be offered to those who want to complete the survey over the telephone. A copy of the prompting script is included as **Attachment Q**.
- *Step 3. Last chance letter.* Twelve weeks after the initial survey mailing, NORC will send one final mailed outreach to non-responding agencies. This will include a last chance letter, question guide, and letter of support from IACP. Depending on project needs, this may either be sent out via USPS first class mail or FedEx, or some combination of the two depending on available addresses and successful previous contacts with the agency. A copy of the letter is attached as **Attachment R**.
- *Step 4. Last chance email prompts.* Concurrent to the last chance letter (and with similar text), a personalized last chance email will be sent to the best-known address of both chiefs of police and the tribal law enforcement agency. This will underscore the importance of participation and will reflect any prior contact already made with the agency (see **Attachment S**).
- *Step 5. IACP Nonresponse follow-up.* Fourteen weeks after follow up until the close of data collection, partner organizations that participated in the development of the CTLEA surveys will be asked to assist in the nonresponse follow-up by phone and email as necessary via personalized outreach. Scripts will be similar to those provided in **Attachment O and Q**.

Alaska data collection and nonresponse follow up

Unlike the data collection and follow up effort described for tribal LEAs, the project will rely on central offices within the Alaska State Troopers for distribution, follow-up, and, where appropriate, completion of surveys. At the start of the data collection period, a copy of the CTLEA survey will be forwarded to the central office for the Alaska State Troopers. One survey will be completed on behalf of all VPSOs, with aggregate data used to populate the survey. The Alaska State Troopers have confirmed their ability to provide aggregate data and complete the CTLEA survey as written. Email and telephone follow-up as described above will be used with the Alaska State Troopers as necessary.

Upon completion of the CTLEA survey, the responding agencies will be sent a Thank You Letter (**Attachment T**).

Phase 3. Data collection verification, validation and editing

Throughout data collection, NORC staff will review frequencies on a weekly basis to assess item missingness, if values are within range, and if inconsistencies can be resolved. If it is determined that updated data are needed due to errors, inconsistencies, or missing data, the data collection agent will contact the data provider for clarification as close as possible to the date of completion of the web survey (**Attachment U and V**).

Phase 4: Weighting for unit non-response and item imputation

Weighting for Unit Non-Response

Although it is anticipated that the steps mentioned above will result in participation from at least 90% of LEAs, similar to the last iteration of the CTLEA data collection (response rate = 94%), there will likely be a percentage that do not complete the survey in a timely manner. While the CTLEA is intended to be a census, the final list of responding agencies is likely to be a nonrandom sample of the study population due to differential response rates across subpopulations. NORC will develop an analysis weight for each respondent through a two-step weighting adjustment procedure. The sample base weight is 1 for all sample members because it is a census. The first step is an eligibility step. If any respondents are found to be ineligible, the base weight will be set to zero at this step. It is not expected that many agencies will be found to be ineligible as all agencies were screened during the universe development stage.

The second step is a nonresponse weight adjustment step. Through this adjustment, the weight carried by non-respondents is transferred to respondents within each adjustment cell so each responding agency will represent a portion of the non-responding agencies and the sum of the weights will be the total number of eligible agencies. To determine which variables should be used to create the adjustment cells, a non-response bias analysis to compare response rates among different subgroups will be carried out. Variables analyzed will include the source of inclusion, law enforcement agency type (i.e. LEA, conservation agency, campus police), PL-280 Status, Native American land type, agency location (state or region), American Community Survey (ACS) reservation population estimate (as a proxy for agency population size), and other ACS variables such as the percentage of the population that is American Indian. Response rates by land size (in square mile) categories will also be explored. Variables where subgroups have the largest differential response rates will be used to define the adjustment cells for the nonresponse weight adjustment. The details of these analyses will be included in a non-response bias analysis report. To avoid introducing unnecessary weight variation, each adjustment cell must contain at least 20 cases.

Imputation for Item Non-Response

While high item response is anticipated, agencies may leave items blank due to lack of access to the information or the fact that the data are not being recorded by the agency's records management system. To address this, it is planned to use a hot-deck method for imputation to

ensure a complete data file as this method protects relationships between variables that are observed in the non-missing data. This single-imputation method does result in an under-representation in variance. If there is a high non-response rate for certain items (20 percent or more), multiple imputation could be considered for some variables.

Multiple imputation involves model building for multiple related variables in which all are imputed together or sequentially. For each variable to be imputed with the hot-deck method, the file will be sorted by variables that have correlations with the variable to be imputed. These “sort” variables will be chosen based on models in which the variable to be imputed is the dependent variable and the independent variables (sort variable candidates) will be other questionnaire items or variables known for all eligible agencies considered for weighting (see above). Once the file is sorted, the hot-deck imputation will use the nearest neighbor as the donor for the missing value. Each variable to be imputed will be sorted according to its own set of sort variables.

3. Methods to Maximize Response

The CTLEA aims to obtain a response rate of 90% or more, similar to the most recent CTLEA’s response rate of 94% and the BJS 2018 Census of State and Local Law Enforcement Agencies (CSLLEA) response rate of 92.5%.

BJS and NORC have and will continue to undertake various steps to help facilitate high response rates for the CTLEA survey. In addition to the various survey methodology strategies discussed in the data collection section above, best practices learned from the cognitive test and for collecting data from tribal justice agencies will be incorporated. BJS, NORC, and partner agencies have taken a proactive approach to engage with key stakeholders, including tribal leadership, federal government agencies, and tribal law enforcement agencies, as well as coordinate with BIA and tribal organizations and tribal law enforcement experts from around the country to design the CTLEA survey instruments. The development of the CTLEA surveys with the input and support of tribal law enforcement practitioners working in Indian country continues to be essential to the development of the culturally centered survey and served to inform tribal nations about the project early on. In July, 2025, an introduction letter and one-page flyer summarizing project activities of the CTLEA was sent to tribal leaders of all federally recognized tribes informing them of the CTLEA project, the types of data to be collected, the reasons for the collection, and requesting their support, in addition to encouraging participation in the tribal law enforcement verification process described above.

Tribal and Federal Webinars. As described in Part A, through the series of hosted webinars, BJS sought valuable input from tribal leaders, tribal law enforcement and court administrators, justice practitioners working in Indian Country, and other interested parties centered around data needs, data gaps, and successes and challenges faced by tribal justice systems. It is our hope that these efforts will result in full engagement and participation in the survey.

Indian country law enforcement expert panel. Also outlined in Part A, to ensure that the CTLEA survey captures key measures on the administration and operation of tribal LE agencies with clarity and an informed perspective from tribal LE professionals, BJS hosted a two-day

expert panel meeting in Albuquerque, New Mexico comprised of representatives from various LE agencies that work directly in Indian country. In total, there were 39 attendees of the Tribal Justice Panel including subject matter experts in tribal law enforcement, and tribal court systems and representing tribes exercising various types of law enforcement jurisdictional authority, including tribes that were and were not subject to Public Law 280.

There were also 10 federal attendees at the meeting representing BJS, FBI, OJJDP, OTJ, and BIA. These federal staff attended the meeting to learn more about the needs of tribal law enforcement agencies and tribal court systems and to offer their input on the CTLEA and CTCS surveys. Some federal attendees (FBI and OJJDP) also gave presentations describing other federally sponsored tribal data collections that they help facilitate. These presentations aimed to inform panel members of the various tribal data collections already taking place to avoid duplicating data collection efforts and identify gaps in current data collections.

In addition to presentations and open discussion, panel members spent a significant portion of the panel reviewing and suggesting changes to the prior round's survey instrument and provided content and survey item suggestions. The panel members conducted a detailed review of the survey content and questions section by section. In addition, the panelists also discussed eligibility criteria, dissemination of survey reports, and engagement with tribal leadership and respect of tribal sovereignty.

Indian Country justice agencies marketing strategy. As described earlier, prior to the start of data collection, IACP will lead outreach to tribal law enforcement agencies and IACP ICLES membership to inform them of the upcoming CTLEA collection. In addition to attending conferences and hosting webinars, IACP and NORC will also share a CTLEA project summary (**Attachment K**) with various Native American media, professional associations and organizations asking that they distribute materials about the project. The NORC website will describe the utility and benefits of CTLEA results in understanding the challenges of crime and justice in Indian country and it will also indicate the types of information that will be collected, including budgets, staffing and work activities. IACP will host a website on its domain highlighting details of the study and the importance of participating, similar to content already hosted on the NORC domain ([Census of Tribal Law Enforcement Agencies | NORC at the University of Chicago](#)). IACP will also host the webinar titled, "Why Data Matters: Strengthening Tribal Policing Through Information, Evidence, and Collaboration" (**Attachment G**)

Letter of support. A letter of support (**Attachment L**) from IACP ICLES will accompany the initial survey mailing. Subsequent updates about the value of the survey will continue to be communicated to IACP's membership through its ICLES, which has many tribal law enforcement chiefs as members. IACP will also issue project updates via social media outlets, conferences, and other communications to their membership.

Response modes. The data collection plan includes a multi-mode collection strategy so that surveys may either be completed online or via phone. A hardcopy option is not planned as the skip logic of the survey is more sophisticated this round compared to the previous round.

Additionally, NORC will monitor a project specific email address and toll-free number, both of which allows respondents to contact NORC with questions on the survey or issues they encounter.

4. Test of Procedures or Methods

Frame verification

As outlined in section B1, frame verification was conducted through several steps: 1) comparing the list of tribes to BIA's annual list of 575 federally recognized tribes, 2) contacting tribal leadership to review and update existing information on tribal LEAs, 3) scanning IACP's Indian Country Law Enforcement Section Roster and membership database, and lastly, 4) checking online sources or, in the event that the information could not be verified through other sources, contacting the tribe to ensure the most current and correct information is available.

As a result of the updating process outlined above, 303 total LE agencies were identified as meeting the CTLEA eligibility criteria. The 279 tribal-government-operated agencies (including VPSO programs) provide services to a subset of the 575 federally recognized tribes. Ongoing updates to agency contact information will be incorporated into the universe list as new information is made publicly available by the tribes via website updates, by BIA, or through other public sources.

Survey development

BJS built on the existing 2019 CTLEA survey and developed new survey questions to capture topics most critical to tribes, tribal justice experts, tribal LE agencies and federal agencies. A thorough literature review, a scan of new and updated legislation since the last iteration of the CTLEA collection, and numerous outreach and engagement events seeking input from tribal representatives were conducted to inform modifications to the survey instrument.

CTLEA cognitive testing. On behalf of BJS, NORC at the University of Chicago (NORC) conducted cognitive interviews on the CTLEA survey to confirm item comprehension and assess the respondent burden. The cognitive testing was conducted under the BJS's generic clearance (OMB Control Number 1121-0339). A total of 20 tribal LE agencies were selected and invited to participate in cognitive testing. To ensure representation, the following criteria were considered: size of resident population, geographic location, and PL-280 status. The cognitive test period lasted from August 8th through October 24th, 2025 and a total of 12 agencies completed the cognitive interview. A breakout of the participating agencies is shown in Table 2.

Table 2. Cognitive testing tribal law enforcement agencies by selection criteria

ID Number	PL-280 Status	Size	Geography
10001020	PL-280	Small	West
10001040	PL-280	Small	North
10001270	Not PL-280	Small	East

10001130	Not PL-280	Small	East
10001160	Not PL-280	Small	West
10001290	Not PL-280	Small	West
10001140	Not PL-280	Small	South
10001080	PL-280	Medium	West
10001070	PL-280	Medium	North
10001190	Not PL-280	Medium	West
10001110	PL-280	Large	North
10001250	Not PL-280	Mega	West

The CTLEA cognitive test was divided into two phases: *outreach and appointment scheduling*; and *data collection and cognitive interview feedback*.

Outreach and appointment scheduling: For those agencies identified as potential participants, NORC research staff sent an invitation email and followed up by phone. Upon successful contact with the agency, they were provided with background information on the collection and need for participation in the cognitive interview, and if agreeable, an appointment was set with the best contact.

Immediately after the interview was scheduled, a calendar invite was sent to the contact along with the Question Guide for pre-review, time permitting. One business day prior to the scheduled interview, a reminder email was sent to the contact, along with a link to the web survey, access PIN, and brief set of instructions for joining the video conference.

Data collection and interview feedback: During the scheduled video conference for the cognitive interview, participants were given the opportunity to ask questions about the project and the interview process was explained. They were asked if they had completed the Question Guide prior to the interview, with the response noted as this impacted the responses provided in the cognitive interview. Finally, participants shared their computer screen via the video conference software so cognitive interviewers could follow along and note any challenges with navigation or providing responses in the survey. During the interview, both general probing questions and specific questions were asked at certain points in the questionnaire. These responses, along with any issues raised organically by the participants were noted.

The time to complete the cognitive interview for all LEAs on average was 60 minutes and a median of 45 minutes. Across agencies, the majority reported no difficulties in providing general numerical information regarding staffing counts for sworn officers, calls for service, or adult and juvenile arrests, though some subsets of these requests were more difficult to provide for some agencies.

Agencies reported that the planning and thought put into the survey was evident, with questions being clear, response categories exhaustive, and appropriate terminology was used to capture the concepts being measured. Further, they noted that the collection was timely, and the subjects

included were relevant and important to LEAs, tribal leadership, and the communities they serve. Many agencies agreed that the perceived response burden felt appropriate based on the questions asked and topics that were included.

Based on feedback from the cognitive test, wording and question revisions were made to the survey to address updated terminology as well as revisions to questions that were added to the survey since the last fielding. This included expanding some of the response options, bolding or emphasizing certain words or phrases in the question text and adding definitions or examples. Item non-response was low across all questions, though some ‘no’ responses in the grid question formats were left blank by some agencies. This is likely due to the format of the cognitive test instrument, which did not require responses to any questions. This will be updated in the main fielding of the survey, with soft prompt reminders to provide responses where appropriate. Some questions were eliminated based on reported burden or difficulty of answering the question by agencies, which is why the estimated burden for the 2025 CTLEA is 30 minutes.

5. Contacts for Statistical Aspects and Data Collection

The Bureau of Justice Statistics within the U. S. Department of Justice is the sponsoring agency for the CTLEA. NORC is the data collection agent.

- BJS contact –
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