

Hello:

I am writing in response to an RFI found in the *Federal Register* pertaining to the Annual Survey of Jails in Indian Country. I am pleased to submit the following comments prepared by my staff:

**Comment on Agency Information Collection Activities; Proposed eCollection eComments Requested; Revision of a Currently Approved Collection: Annual Survey of Jails in Indian Country [OMB Number 1121-0364].**

We are a group of individuals writing on behalf of the University of Michigan's (U-M) Inter-University Consortium for Political and Social Research (ICPSR). ICPSR manages the National Archive of Criminal Justice Data (NACJD), a longstanding collaborative project that facilitates open science in crime and criminal justice. Since 1978, the archive has been instrumental in archiving and disseminating data for the U.S. Department of Justice. This email responds to your request for commentary about the collection of the Annual Survey of Jails in Indian Country (SJIC).

**Comment 1: Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Bureau of Justice Statistics, including whether the information will have practical utility.**

The Annual Survey of Jails in Indian Country (SJIC) series stands as a highly utilized and respected BJS data resource, with both public-use and restricted-use datasets archived at NACJD. NACJD use statistics reflect strong engagement from the research community. For example, *the Annual Survey of Jails in Indian Country, 2023 (ICPSR 39184)* was downloaded 444 times since its release in September 2024, indicating ongoing demand and relevance for secondary analysis. The most recent release, *Annual Survey of Jails in Indian Country, 2024 (ICPSR 39407)*, has already been downloaded 31 times just weeks after publication.

Applications for restricted-use data are managed through the standard application process (SAP) portal, ResearchDataGov, demonstrating that the collection facilitates access to sensitive data for qualified researchers while maintaining necessary protections.

SJIC is a longstanding, invaluable resource for criminal justice research and policy with data collection stretching back to 1998. It is both practical and necessary for BJS to continue this annual data collection. Ongoing data collection ensures continuity for this serial dataset, supporting longitudinal analyses by BJS experts and enabling new research by the wider criminal justice data community via NACJD. Continued support for the SJIC contributes directly to evidence-based policy and research focused on Indian country correctional facilities.

**Comment 2: Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.**

The 70.5 total annual burden (hours) is a reasonable estimate for time required for respondents to complete the SJIC survey. For SJIC 2024, the burden of this collection was estimated to average 60 minutes per form, so the updated estimated time for each respondent of 55 minutes is in line with, though slightly lower than, previous years. The value of the SJIC data to the scientific research community, tribal nations who cannot collect this data alone, and to policymakers outweigh the minimal time burden associated with facility responses.

**Comment 3: Evaluate whether and if so how the quality, utility, and clarity of the information to be collected can be enhanced.**

The quality, utility, and clarity of the information to be collected can be enhanced by continuing to ask survey questions in a consistent manner with prior years. Consistency supports comparability for longitudinal analysis. Additionally, ongoing archiving of the data collection at NACJD ensures that data can be curated and made available to secondary users in a manner consistent with prior years. This archiving process includes performing

quality checks and converting files to multiple data formats, which promotes both accessibility and usability for researchers and other stakeholders.

**Comment 4: Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.**

Ways to minimize the burden of the collection of information include offering multiple modes of data collection and standardizing the questionnaire and data collection methods over the three-year period. Providing respondents with a consistent form from year to year increases the efficiency with which they can complete the survey, reducing the time required and minimizing potential confusion or errors. We appreciate the Bureau of Justice Statistics' ongoing commitment to high-quality data collection and transparency. By continuing to support the SJIC and facilitating open access to these important datasets, BJS helps advance evidence-based practices and research on Indian country correctional facilities. We look forward to continued collaboration in ensuring that these resources remain useful and accessible to all stakeholders.

Regards,

Justin Noble and A.J. Million on behalf of ICPSR