MEMORANDUM

MEMORANDUM TO:	Jennifer Park
	Official of Statistical and Science Policy
	Office of Management and Budget
THROUGH:	Lynn Murray
	Clearance Officer
	Justice Management Division
	Christopher A. Nicholas
	Section Chief
	Law Enforcement Support Section
	Federal Bureau of Investigation
	Amy C. Blasher
	Unit Chief
	Crime Data Modernization
	Federal Bureau of Investigation
FROM:	Cynthia Barnett-Ryan
	Survey Statistician
	Crime Data Modernization
	Federal Bureau of Investigation
DATE:	October 6, 2016
SUBJECT:	Federal Bureau of Investigation (FBI) Request for Office of Management and Budget (OMB) Clearance for National Incident-Based Reporting System (NIBRS) Program's modernization study activities under the OMB generic clearance agreement (OMB Number 1110-0057).

The Federal Bureau of Investigation (FBI) Crime Data Modernization (CDM) Team has begun its modernization activities to prepare for the Uniform Crime Reporting (UCR) 2021 cutover from the Summary Reporting System (SRS) to the National Incident-Based Reporting System (NIBRS), which will add more statistical rigor to its data collection programs.

The NIBRS's incident-based reporting provides specific details on crime including data about victims, offenders, property, and arrests, along with information on each offense, depicting a comprehensive view of crime and criminal activity. Having detailed information is powerful and helps dispel misperceptions, foster accountability, and promote transparency in how law enforcement personnel are relating to and supporting the diverse communities they serve.

This request for approval, under the FBI UCR Generic Clearance (1110-0057) is for activities involved in the collection of information on the modernization of the NIBRS, and the impact of the 2021 cutover from SRS to the NIBRS on state, local, federal, and tribal law enforcement agencies, as well as external stakeholders. These activities are estimated to require 118 burden hours.

Purpose of the Study

The FBI UCR Program is a nationwide, cooperative statistical effort of over 16,000 city, college and university, county, state, tribal, and federal law enforcement agencies (LEAs) voluntarily reporting crime data on offenses reported or known. Since 1930, the FBI has administered the UCR Program and continues to assess and monitor the nature and type of crime in the nation. In addition to being one of two national crime measures, the program's primary objective is to generate reliable and valid information for use in law enforcement administration, operation, and management.

The CDM initiative is an FBI Director's Priority Initiative (DPI) to generate the pathway to greater crime data collection and to improve the nation's crime statistics for reliability, accuracy, accessibility, and timeliness of the data through the transition of local, state, and tribal LEAs from the SRS to the NIBRS. The outcome is to sunset the SRS and then replace it with the NIBRS, as the national standard for crime reporting by 2021.

The purpose of the NIBRS modernization study is to ensure the NIBRS 2021 cutover is successful, to gauge the technical readiness of the NIBRS, and to increase state, local, and tribal LEAs voluntarily reporting crime data on offenses to the NIBRS.

Currently, approximately 30% of the crime data submitted to the FBI is in the NIBRS format. Although several states are reporting 100% of their crime data in this format, there are many states which only report part of their data in this format, and several states have not begun the transition to the NIBRS.

The modernization study will examine the "health of the NIBRS" and offer potential recommendations to address challenges surrounding incident-based crime reporting and support technologies in order to ensure representative reporting. The study will be performed by in-person visits and conference calls to study participants which will determine the impacts of the NIBRS 2021 cutover on state, local, and tribal agencies and external stakeholders; the technical readiness for the NIBRS 2021 transition; and provide potential recommendations for post-2021 improvements to the NIBRS.

Background Research

The NIBRS modernization study team performed a comprehensive review of existing Department of Justice (DOJ), FBI, and external stakeholder literature to assist in the development of questionnaire material. The review examined previous crime reporting field assessments, surveys, and questionnaires. Much of the information was collected from the questionnaires performed by the Bureau of Justice Statistics (BJS), CDM Team, and their contractors as part of the National Crime Statistics Exchange Program.

The NIBRS literature review was performed to ensure that the NIBRS modernization study's field visits incorporate previously obtained crime reporting information and leverages lessons learned from the previous crime reporting questionnaires.

From the literature review and working in concert with crime reporting subject matter experts, the NIBRS modernization team developed a potential set or "universe" of potential questions that may be asked during field interviews with NIBRS state, local, or tribal law enforcement agencies. The NIBRS modernization study's interviews will focus on three high-level NIBRS modernization assessment areas related to: 1) the LEA's crime reporting activities; 2) the LEA's preparedness for the NIBRS 2021 cutover; and 3) recommendations for the NIBRS improvements. The NIBRS universe of questions are the list of potential questions asked to a participating LEA.

The NIBRS modernization study will work in concert with staff from other Federal agencies and participation in working groups around the topic of crime data reporting. All efforts would be collaborative in nature, and no duplication in this area is anticipated.

Selection of Participants

The NIBRS modernization study, working in cooperation with state UCR coordinators and CJIS Systems Officers, will transmit an email (see attachment 2) inviting LEAs to participate in a NIBRS modernization study. All participants will be volunteers and are self-selected by the LEA leadership.

Agencies will be selected based in part on their size and their current NIBRS reporting status. This selection process will ensure that we will be able to ascertain the significance and impact of incident-based crime reporting on small, medium and large agencies. For agencies that have not made the transition to the NIBRS, we will be able to determine to potential concerns of the agencies. For agencies that are already reporting NIBRS data, we will be able to determine their overall satisfaction with this system. As the study progresses, interview participation may focus on a specific subset of organizations that can provide relevant information related to key-issues or themes that are extracted during early interviews. As a result, a specific minimum number of agencies in each category has not been determined. The study does not include a statistical analysis of participation to determine significance. The following methodology comprised of exploratory interviews and focus groups will be utilized for interviews that are part of the NIBRS modernization study.

Participant Interview

The NIBRS modernization study participant interviews will be exploratory interviews and focus groups covering three general areas: 1) the LEA's crime reporting activities; 2) the LEA's preparedness for the NIBRS 2021 cutover; and 3) recommendations for the NIBRS improvements to boost participation. The universe of questions (Attachment 3) will be used to gather information to be able to report on the three general areas. With this approach, the study team will ensure that the study does not limit a participant's responses. The NIBRS universe of questions comprise the list of potential questions to be asked of the respondent.

Group Interview

The NIBRS modernization study will interview LEA-oriented groups. Examples could include a group of individuals working in the LEA's crime reporting or information technology departments, or groups of LEAs with similar challenges or concerns. Each group interview will be informal, but will cover the same

three general areas as a participant interview. The interview will use questions from the universe of questions (Attachment 3), but not follow a predetermined format to allow the interview to be adaptable to the priorities of the LEAs. With this approach, the NIBRS study team will ensure that the study does not limit a participant group's responses.

Developmental Activity Procedures Language

All interviews and follow-up activities will be conducted in English.

Burden Hours for Developmental Activities

The estimated hour burden for the NIBRS modernization study's participant and group interviews will equal approximately 108 burden hours in 2016 and 10 burden hours for potential follow-up re-interviews in 2017. The study's participant and group interview population is anticipated to need an approximate total of 72 participants in 2016 and 10 participants in 2017. The estimated total burden hours across 2016 and 2017 for all proposed NIBRS modernization study activities are estimated to be 118 hours.

The NIBRS modernization study participant and group interviews will be in-person and will primarily occur at the participant or group's LEA facilities. A portion of the interviews will occur in conjunction with attendance at law enforcement conferences (e.g. International Association of Chiefs of Police, Major City Chiefs of Police, and Association of State Uniform Crime Reporting Programs). As necessary, the CDM Team will contact law enforcement agencies, UCR state coordinators, and crime reporting stakeholders.

Table 1: Burden Estimate

Year	Participant Interviews			Group Interviews			
	Participants	Hrs. /Participant	Hours	Group Participants	Hrs. /Participant	Hours	Total Hrs.
2016	52	1.5	78	20	1.5	30	108
2017 (possible re-interview)	10	1	10	0	0	0	10
3-Year	62		88	20		30	118

This plan involves conduct of exploratory interviews with individuals at the various agencies. Depending on the agency, it may be useful to also conduct additional focus groups with agency personnel. The length of each participant or group interview will be determined by the size of the LEA and LEA staff availability. As a result, the length of a study interview is not thoroughly known at this time. The lengths of interviews will be planned and monitored closely and, as the study progresses, the most critical elements within the study's three themes will be prioritized to ensure consistency with the burden estimate. By efficiently managing the scope of the interviews and utilizing best practices for maintaining the course of the conversation, the estimated likely interview population for the NIBRS modernization study's interviews and potential re-interviews are anticipated to fall within burden hour estimates. The universe of potential NIBRS study questions is included with this request (Attachment 3).

All modernization study participants will receive the NIBRS modernization study's public information sheet (Attachment 1) and will receive a participation email (Attachment 2) introducing the study team and describing the modernization study.

Estimate of Cost Burden

The NIBRS modernization study will not reimburse participants, groups or agencies for participating in the modernization study conducted under this clearance.

Analysis Plan

The results of the NIBRS modernization study will be an assessment of current LEA crime reporting record-keeping; local, state and tribal crime data use habits. The NIBRS modernization study's participant and group interviews will collect information that will assist the modernization study team to gain an understanding of the capabilities and barriers that exist in state, local, federal, and tribal LEAs with regards to collecting and reporting crime incident data and meeting the 2021 transition to the NIBRS.

The NIBRS modernization study team will summarize the interview notes and extract common themes (e.g. common areas of participant agreement and areas of participant disagreement) that will be summarized in the modernization study to provide the CDM Team the state of the NIBRS in being prepared for the 2021 cutover from summary reporting to incident-based crime reporting.

The information collected in this effort will not be the subject of estimates or other statistics in FBI UCR or the NIBRS Program reports. The results of the modernization study may be prepared for presentation at professional meetings or publication in professional journals. Due to the nature of this clearance, there is no definite or tentative time schedule at this point. The work is expected to be conducted more or less continuously throughout the duration of the clearance.

Informed Consent, Data Confidentiality and Data Security

The NIBRS modernization study participation is voluntary and each participant interview will begin with a review of the NIBRS modernization study informed consent form (Attachment 4). All individuals being interviewed will receive a copy of the informed consent form. The interview will not be recorded.

The NIBRS modernization study team will protect the privacy of information provided to the extent permitted by law and will take procedural safeguards such as limiting access to those on the project team, destroying or encrypting identifiers once the project is complete, and other physical security measures. Furthermore, when working with other Federal agencies, the NIBRS team will work with its partners to ensure confidentiality and privacy protections are agreed upon and enforced equally by all parties.

Attachments:

        Attachment 1 – NIBRS Public Information Sheet
        Attachment 2 – Study Participation Email
        Attachment 3 – Universe of Potential NIBRS Study Participant Questions
        Attachment 4 – NIBRS Participation Consent Form