

SUPPORTING STATEMENT

A. Justification

1. Necessity of Information Collection

The proposed 2011 Survey of Campus Law Enforcement Agencies will provide systematic agency and national-level information about the personnel, budgets, equipment, policies and procedures, and use of technology by campus law enforcement agencies serving universities and colleges across the United States. There is no other source for these important statistics.

The importance of collecting these statistics is evident in light of the fact that the U.S. Congress has mandated in the Crime Awareness and Campus Security Act of 1990 (now known as the Clery Act) that every campus in the U.S. must provide annual crime reports to the Department of Education as well as to faculty, staff, and students (both current and prospective). The data to be collected in this survey will effectively supplement the Clery Act statistics, by providing data on the characteristics of the law enforcement agencies serving each campus and the resources available to these agencies to prevent and respond to crime.

As part of its efforts to streamline its law enforcement collections, BJS is separating data collections linked to special purpose agencies such as campus law enforcement agencies from collections related to general purpose agencies such as state police, local police, and sheriffs' offices. This allows for more efficiency in designing a sample appropriate for each specific type of agency and for tailoring questionnaire content that is tailored to the different types of jurisdictions (e.g., campuses) served by special purpose agencies.

It is especially important to conduct a separate survey of campus law enforcement agencies because the campus law enforcement environment includes both public and private agencies that may employ sworn police or nonsworn security officers, unlike the general purpose public agencies (state police, local police, sheriffs' offices) in LEMAS that employ only sworn personnel. The campus law enforcement community also has its own stakeholder organization - the International Association of Campus Law Enforcement Administrators - which has taken an active interest in the new survey.

Previously data collected about campus law enforcement agencies by BJS has shown that:

- Three-fourths of campus law enforcement agencies serving 4-year universities and colleges with 2,500 or more students employ sworn law enforcement officers.
- Nearly all public campuses (93%) use sworn officers compared to less than half of private campuses (42%).
- Entry-level sworn police officers earn an average starting salary of \$30,600, about 6% less than their counterparts in local police departments.
- Agencies require an average of more than 800 hours of training for new officers, ranging from 400 hours at small private colleges to 1,100 hours at large public universities.

- About 1 in 4 campus law enforcement agencies use in-field computers.
- About two-thirds of campus law enforcement agencies have a written terrorism response plan.
- Nearly all students at 4-year schools with 2,500 or more students have access to crime prevention programs provided by campus law enforcement personnel.

Currently, BJS does not find a compelling need to conduct its surveys of law enforcement agencies on an annual or even bi-annual basis. However, its experience with such surveys in the past has shown that significant trends can be detected in many subject areas at intervals of 3 years or more. BJS has tracked trends through its surveys in areas such as officer diversity, training requirements, types of equipment used, and the development of new technologies. BJS initially collected data from campus law enforcement agencies in 1995, and again, as a supplement to the 2004 Census of State and Local Law Enforcement Agencies, covering the 2004-05 school year. Therefore, the most recent available data on campus law enforcement agencies are at least 6 years old and in need of updating.

Beginning with the new survey, BJS hopes to continue to conduct the survey approximately every 5 years. This would be a longer time between surveys than other BJS law enforcement surveys, but sufficient to provide periodic updates that meet the needs of information consumers. This periodicity would also be sufficient for the tracking of trends, and to address the new issues that emerge in the field of law enforcement on a regular basis. Examples of new developments in campus safety in recent years that the survey needs to address in more detail include emergency preparedness and mass notification systems.

The statutory mandate to collect these data is derived from Title 42 U.S.C. Section 3732 (Attachment 1), in which the Bureau of Justice Statistics (BJS) is directed to collect and analyze statistical information regarding the operation of the criminal justice system at the Federal, state, and local levels.

2. Uses of Information

The data to be collected from the 2011 Survey of Campus Law Enforcement Agencies will be used to provide national-level and campus-level measures of law enforcement personnel, budgets, equipment, and policies and procedures. These statistics are requested and used by police chiefs, security directors, education administrators, legislators, planners, researchers, and others to identify resource needs, trends, and priorities in campus law enforcement.

The primary national membership organization for campus police chiefs and security directors is the International Association of Campus Law Enforcement Administrators (IACLEA). This organization, with approximately 1,300 members, recognizes the BJS survey as the only nationwide survey that can produce objective and comprehensive data covering a wide range of campus public safety issues. Campus law enforcement administrators will use the information collected in the survey to conduct crucial benchmark comparisons to assess their own operations relative to other agencies. Agencies studying potential changes, such as from nonsworn security to sworn police, or from unarmed to armed officers, have utilized BJS data to examine the costs in terms of salaries and benefits, equipment, and training associated with such changes.

Agencies have also used BJS data to develop budget requests to hire additional staff, by developing comparisons with other agencies serving campuses with similar enrollments, geographic settings, or crime levels in the surrounding area. Agencies also use BJS data to identify agencies that may assist them with the development of policies in areas such as use of force, pursuit driving, and use of new technologies. Similarly administrators use BJS data to identify other agencies for assistance in the development of programs in areas such as community policing, drug and alcohol education, rape prevention, victim assistance, and emergency preparedness.

Other areas for which campus law enforcement agencies have used the BJS data for comparison purposes include patrol allocation strategies, officer recruitment and retention strategies, officer salaries and benefits, education and training requirements for officers, use of computers and new technologies, and the development of new information systems. The national benchmarks provided by this survey also help campus law enforcement officials and public policy makers identify gaps in areas such as access to services, emergency management, and homeland security so that efforts to protect the campus population and prevent crime can be enhanced. The BJS survey data are also used by IACLEA assessors who perform management reviews of campus public safety departments under the Loaned Executive Management Assistance Program (LEMAP). Please see the attached endorsement letter from IACLEA sent to BJS in support of the survey.

The importance of campus safety is made evident by the Congressionally-mandated reporting of crime on campus required of all U.S. post-secondary institutions receiving federal funding. The data collected by the Survey of Campus Law Enforcement Agencies will provide valuable information to administrators, researchers, and policy makers for the study of the covariates of campus crime both in terms of general campus characteristics and the characteristics of campus law enforcement agencies. Such information could serve to be useful in developing responses that reduce the incidence of crime on campus.

To achieve this goal, BJS will develop, independently of the survey data collection, a profile of approximately 350 large 4-year campuses (those with a total enrollment of 10,000 or more) using existing data sources. This profile will include supplemental data such as campus physical characteristics (e.g., number and total square footage of buildings), number of campus staff and visitors, geographic setting (region, urban vs. rural, etc.) of the campus, and selected demographic and crime-related characteristics of the surrounding community. Using the Office of Postsecondary Education identifier (OPEID), these profile variables will be linked to the survey data for these campuses.

The data collected in the BJS survey will also be linked through the OPEID to the Clery Act data collected by the Department of Education. The Clery Act data include reported serious crimes (except for larceny) and violations related to drugs, alcohol and weapons. These data are required by law to be reported annually and are available for any reference year chosen for use with the BJS survey data. Based on discussions with campus law enforcement executives, it was decided by BJS that the survey will collect data on larcenies reported to campus law enforcement authorities since this offense is excluded from the Clery act submissions. This will create summary crime statistics for campuses that are equivalent to those published by the FBI in its Uniform Crime Reports products. BJS plans to incorporate all linked data into an online web tool to be developed for public access on its web site. If this effort is deemed successful, it

may be expanded to all schools covered by the survey depending on the availability of staff resources.

3. Efforts to Minimize Burden

To reduce respondent burden, the data collection methodology will include two versions of the data collection instrument (see attachments). Larger agencies (those serving 4-year schools with 5,000 or more students or 2-year schools with 10,000 or more students) will receive the 12-page long-form (CJ-42L). Smaller agencies (those serving 4-year schools with 1,000 to 4,999 students or 2-year schools with 2,500 to 9,999 students) will receive the shorter 8-page CJ-42S.

BJS will also offer a web-based response option as part of this data collection and will encourage respondents to use this option. (OMB will be provided access to the web-based instruments for review as soon as they are available.) Based on the results of the 2008 Census of State and Local Law Enforcement Agencies, BJS estimates that up to 60% of respondents will use this electronic option. To maximize the response rate, BJS will provide options for respondents to submit their data by mail or fax, if the web option is not suitable for them. Based on past experience with surveys of law enforcement agencies, some telephone follow-up calls may be necessary to obtain information from non-respondents and from respondents with incomplete information. BJS will make every effort to obtain responses through other means (web, fax, mail) before implementing telephone follow-up procedures.

BJS has attempted to minimize the complexity of questions and ensured that terminology conforms to current standard practices in law enforcement. Based on the pretest results, it is estimated that data collection will take two hours per long-form respondent and one hour per short-form respondent.

4. Efforts to Identify Duplication

There will be no duplication of effort based on the nature and scope of this survey. The information sought is not attainable from any other data source.

5. Minimizing Burden on Small Businesses

Not applicable. No information will be gathered from small businesses.

6. Consequences of Not Conducting Collection

This data collection will be the only source of national data on campus law enforcement personnel, budgets, equipment, use of technology, and policies and procedures. There are no other sources for these data. Without this data collection there will be no source for recent data on the status of campus law enforcement agencies in the United States.

7. Special Circumstances That Would Increase Respondent Burden

There are no special circumstances that would require a respondent to report more than once, report in less than 30 days, retain records over three years, or in any other foreseeable way increase the respondent's burden to provide the requested information.

8. Public Comments and Consultations

BJS has consulted with staff of the International Association of Campus Law Enforcement Administrators (IACLEA) and various members of the campus law enforcement community regarding the questionnaire content and the clarity of instructions. Key events in the process have included the following:

- June 2008 - BJS statistician, Dr. Brian Reaves, and BJS Senior Statistical Advisor, Dr. Allen Beck, met with the 15-member IACLEA Board of Directors at the Annual IACLEA Conference in Hartford, Connecticut. This meeting provided Board members with an opportunity to provide feedback to BJS on their information needs and to advise BJS on how the survey could best address those needs. At the meeting it was agreed that IACLEA would form a Survey Review Committee to work with BJS on the formulation of questions for the 2011 Survey. Vickie Weaver, Director of Public Safety at Rider University, is Chair of the Committee. While at the conference, Dr. Reaves spoke to a plenary session of several hundred attendees about the BJS survey.
- February 2009 – Drs. Reaves and Beck hosted a meeting of the IACLEA Survey Review Committee. In addition to the face-to-face meeting at BJS, ongoing email discussions with attendees and other committee members unable to attend provided valuable input into the survey instrument development process.
- April 2009 – Dr. Reaves attended the IACLEA Mid-Atlantic Regional Meeting in Atlantic City and with Director Weaver, hosted a focus group to discuss the survey instruments.
- December 2010 and January 2011 – Conducted pretest of instruments at eight selected campuses representative of the different types and sizes of campuses served by the agencies that will be receiving the survey instrument. The pretest involved 4-year and 2-year campuses with a range of enrollments, and included those under both public and private control. The pretest volunteers were in addition to those who serve in a consultant role on the project. BJS has incorporated the comments of the pretest participants into the current version of the questionnaire (see attachments). Please see the attachment titled “pretest” for the comments provided by the pretest participants. They are listed by the commenter's initials.
 - Jasper Cooke (JC), Director of Public Safety, Augusta State University
 - Thomas Johnson (TJ) , Director of Police, Truman State University
 - Gary Lyle (GL), Director of Public Safety, Anne Arundel Community College
 - Michael Lynch (ML), Director of Police, George Mason University
 - James C. Lyon (JL), Jr., Chief of Police, Northeastern Illinois University
 - Paul Ominsky (PO), Director of Public Safety, Princeton University
 - David Perry (DP), Chief of Police, Florida State University
 - Laura Wilson (LW), Chief of Police, Stanford University

During the development of the survey instrument the following individuals provided significant contributions to its improvement:

1. Peter Berry, Director, International Association of Campus Law Enforcement Administrators, Hartford, CT, (P) 860.586.7517, pberry@iaclea.org
2. Chris Blake, Associate Director, International Association of Campus Law Enforcement Administrators, Hartford, CT, (P) 860.586.7517, cblake@iaclea.org
3. Max Bromley, Associate Professor of Criminology, University of South Florida, Tampa, FL, (P) 813-974-7281 mbromley@cas.usf.edu
4. Howard Cook, Chief of Police, Columbia College Police Department, Columbia, SC, (P) 803-786-3001, hcook@colacoll.edu
5. John Kleberg, Assistant Vice President for Administration (retired), Ohio State University, Columbus, OH, (P) 614-746-4184, jkleberg@columbus.rr.com
6. Joe Monroe, Interim Chief of Police, University of Kentucky Police Department, Lexington, KY (P) 859-257-5770 x 241, jwmonr1@email.uky.edu
7. James Overton, Chief of Police, Delaware State University Public Safety, Dover, DE (P) 320-857-7473, joverton@desu.edu
8. John Sloan, Professor and Chair, Department of Justice Studies, University of Alabama, Birmingham, AL (P) 205-975-5701, prof@uab.edu
9. Doug Tuttle, Policy Scientist, School of Public Affairs, University of Delaware, Newark, DE, (P) 302-831-0718, dougt@udel.edu
10. Vickie Weaver, Director of Public Safety, Rider University, Lawrenceville, NJ, (P) 609-896-5049, weaver@rider.edu

Based on the comments of these contributors, new questions were added to the survey form (see attachment B). The new questions include: Q30 – emergency call systems; Q32 – 800 MHz radios; Q33 – dispatch; Q36 – mass notification systems; Q40 – Number of officers by educational attainment; Q46 – active shooter training; Q55 – student patrols; Q57/Q58 officer participation in special programs; Q59 – campus escort service; Q61/Q62 – agency jurisdiction; Q63 – MOUs and mutual aid agreements; and Q64 - accreditation.

While there is significant new content planned for the survey, it should be noted that some questions in the survey are identical to, or patterned after, those in past LEMAS surveys. These include the following: Q5 - number of personnel, Q6 - race of personnel; Q7 - gender of personnel; Q24 – salaries; Q38 - education requirements for new officers; Q41 - community policing training; Q42/Q44 - screening methods used in the hiring process; Q43/Q45 - training requirements for officers; Q47 – types of weapons; Q48 – number of vehicles; Q50 - in-field computers; Q54 - preparedness activities; Q56 – types of special units; and Q60 – citizen complaints.

To further prepare for the survey, in October 2009, Dr. Reaves met with David Bergeron, Director, Policy and Budget Development, Office of Post-Secondary Education, U.S. Department of Education. Dr. Bergeron is currently the senior management official overseeing the Clery Act data collection activities for DOE. The purposes of the meeting were:

- a) To inform Dr. Bergeron of the planned BJS survey and make sure there was no duplication of effort;
- b) To discuss the suitability of using the Clery Act contact information file for the BJS survey respondent frame; and
- c) To ask for assistance with obtaining the Clery Act contact file.

Results of the meeting were:

- 1) There is no duplication of effort.
- 2) The Clery list is very up-to-date and includes all but a few non-compliant institutions.
- 3) The contact list is available for BJS use and has been provided by Westat.

9. Provision of Payments or Gifts to Respondents

Not applicable. The Bureau will not provide any payment or gift of any type to respondents. Respondents participate in the survey on a voluntary basis.

10. Assurance of Confidentiality

Respondents will be informed that survey participation is voluntary. The data collected are in the public domain and not subject to confidentiality guarantees. All data, except names of individual respondents, will be made available for public use, and BJS will make no assurances of confidentiality to any respondent.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature included in the data collection.

12. Estimate of Respondent Burden

As we discuss in Part B, Statistical Methods, we will contact a total of 1,860 schools for the survey. We expect approximately 261 to be out-of-scope for not having a police or security agency operated by the institution. We will ask these 261 ineligible schools to identify who provides their campus security (external law enforcement agencies, private security firm); this identification should take not more than five minutes per respondent.

The larger part of the respondent burden shall be on the eligible cases. Of the expected 1,599 eligible schools, the long-form (CJ-42L) will be sent to 735 law enforcement agencies serving larger campuses, and the short form (CJ-42S) will be sent to approximately 864 agencies serving smaller campuses (see Section B - Statistical Methods, below, for greater detail). The average time required for each long-form agency is 2 hours, and for short-form agencies, 1 hour. These estimates are based on experience garnered from a pretest conducted with eight agencies and from experience with other law enforcement surveys.

The total respondent burden is estimated at 2,436 hours. Respondents will be asked to respond once. Some respondents with missing or out-of-range items will require follow-up phone calls to resolve these values; we estimate that 20% or 320 respondents will require phone follow-up of 15 minutes. The burden hours are summarized in the following table:

Reporting method	Type of respondent	Number of respondents	Number of responses	Average reporting time	Total burden hours
Screening item – Email or phone	Out-of-scope	261	261	5 minutes	22
Long form - Web, fax, or mail	Larger eligible campuses	735	735	2 hours	1,470
Short form Web, fax, or mail	Smaller eligible campuses	864	864	1 hour	864
Follow-up – telephone or email	Selected campuses	320	320	15 minutes	80
TOTAL	All campuses	1,860	1,860	1.3 hours	2,436

13. Estimate of Respondents' Cost Burden

The survey form, in most cases, will be filled out by one person per respondent, equivalent to the GS-15 / 01 level (\$99,628 per year). The cost to the respondent would be about \$96 per long-form, and \$48 per short-form. For all respondents combined, the approximate cost would be about \$112,000. This information collection will require only information that is already generated and maintained by the respondents. There is no additional cost to respondents other than the cost of filling out the survey form.

14. Cost to Federal Government

The total cost to the Federal government for this survey is estimated at \$458,500, all to be borne by the Bureau of Justice Statistics. Office costs are based on 12 months of work at 1/3 time of a GS-14/10 Statistician salary (\$136,771 per year) and benefits (33 percent of salary) and indirect costs (20% of salary) of the Bureau of Justice Statistics.

Summary of Cost Estimates

Office Costs (BJS)

Salaries	\$45,590
Benefits (33%)	14,458
Travel	2,000
Equipment and supplies	500
Other costs	0
Indirect costs (20%)	8,675
<i>Subtotal</i>	71,223
Collection costs (grantee)	387,277
Total cost to government	\$458,500

15. Reasons for Change in Burden

Expansion of the scope of the survey to include 4-year schools with 1,000 to 2,499 students and 2-year schools with 2,500 to 9,999 students. Representatives of these schools have expressed an interest in being included in the survey so that they may use their peer institutions for benchmark comparisons. This expansion also allows for better coverage of the campus population served by law enforcement agencies nationwide.

16. Publication Plans and Schedule

Information collected from campus law enforcement agencies will be reported in a Bureau of Justice Statistics report. The data will then be made available to the public through the National Archive of Criminal Justice Data (NACJD), operated by the Inter-university Consortium for Political and Social Research (ICPSR). The projected schedule for data collection, publication and data release is as follows:

Preparation and pretesting	Months 1 - 3
Data collection	Months 4 – 10
Data processing/analysis	Months 7 - 12
Publication release	Month 15
Data release to public	Month 16

17. Display of Expiration Date

The expiration date will be shown on the survey form.

18. Exceptions to the Certification Statement

There are no exceptions identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.