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Quick-Response Summary of Request for Information on Criminal Justice Statistics

Nathan N. L. Dinh
Brian L. Zuckerman
Dylan H. Cohen

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1701 Pennsylvania Ave., NW, Suite 500
Washington, DC 20006-5805



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For More Information

Brian L. Zuckerman, Project Leader
bzuckerm@ida.org, 202-419-5485

Kristen M. Kulinowski, Director, Science and Technology Policy Institute
kkulinow@ida.org, 202-419-5491

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Request for Information on
Criminal Justice Statistics**

Nathan N. L. Dinh
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Executive Summary

On May 25, 2022, President Biden signed Executive Order 14074, which established the Working Group on Criminal Justice Statistics. This Working Group was charged with publishing a report to the President that “assesses current data collection, use, and data transparency practices with respect to law enforcement activities, including calls for service, searches, stops, frisks, seizures, arrests, complaints, law enforcement demographics, and civil asset forfeiture.”

To inform this report, the White House Office of Science and Technology Policy (OSTP) released a “Request for Information; Criminal Justice Statistics” on February 16, 2023 as part of their stakeholder engagement process. The RFI (the text of which is included as Appendix A) included 21 topics. As of the closing date, 87 responses to the RFI were received, although 1 response could not be characterized due to its being submitted in an inaccessible format. The Science and Technology Policy Institute (STPI) was asked by OSTP to assist in summarizing the RFI results to the extent feasible by April 7, 2023—8 days after the RFI closed.

Of the 86 responses received and analyzed, 20 were provided by individuals, 5 were provided by academic research groups or research networks, and 61 on behalf of organizations (Figure ES-1). The list of respondents can be found in Appendix B. Of the 20 individual responses, 11 were from academia, 3 from current or former state, tribal, local, or territorial (STLT) law enforcement professionals, 2 from current or former Federal or national-level law enforcement professionals (including 1 international response), 1 was from a journalist, and 3 did not provide institutional affiliations. Of the 61 institutional responses, 28 were on behalf of stakeholder groups such as non-governmental organizations (NGOs), 10 were on behalf of STLT law enforcement organizations (LEOs), 2 on behalf of research entities, 1 on behalf of a Federal LEO, 19 from industry, and 1 from an industry group (CEO Action for Racial Equity).

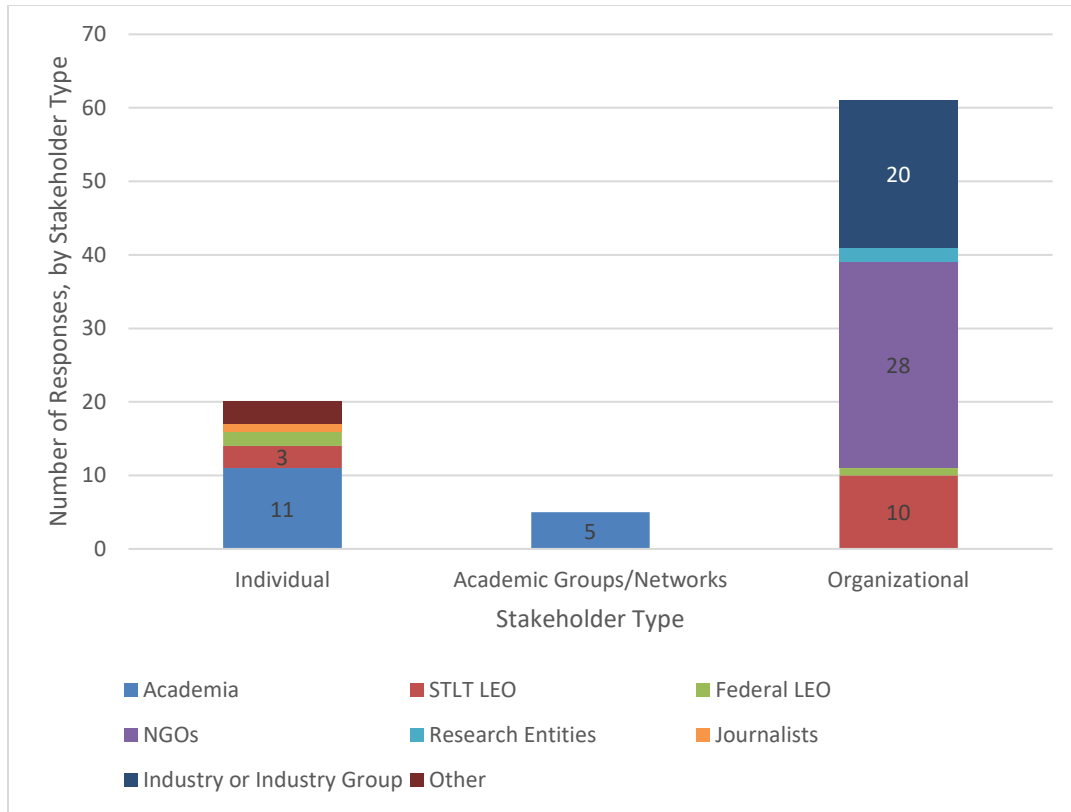


Figure ES-1. Characterization of RFI Respondents by Stakeholder Group

STPI’s approach to analyzing the RFI followed its structure. We began by developing a deductive coding framework corresponding to the key phrases found in the RFI questions and sub-questions. We then extracted text from the RFI responses corresponding to each question. Once the text corresponding to each RFI question was extracted, we then mapped the text manually to the deductive coding framework to identify which responses were relevant to each portion of the RFI questions and to summarize relevant responses. Where RFI responses to particular questions suggested an alternative approach might produce a more useful summary, STPI staff instead summarized the responses based on how respondents answered the question rather than based on the structure of the original RFI question. Several responses, however, did not indicate that they were in response to a particular question or alternatively focused on a single law enforcement-related topic, even if portions of the response were listed as being in response to particular RFI questions. Rather than mapping these responses to the questions, STPI staff summarized each of those responses as a whole in a separate chapter of the report.

Key findings from the RFI analysis and recommendations offered in the RFI responses are summarized in Table ES-1 and discussed below.

Table ES-1. Summary of Findings and Recommendations in RFI Responses

| Key findings from analysis of the RFI responses | |
|---|---|
| Criminal justice data are lacking, inconsistent, and dispersed. | |
| There is a role for the Federal Government to play in standardizing and coordinating current criminal justice data collection efforts. | |
| There were more responses explicitly favoring mandated data reporting than responses explicitly against mandated reporting. | |
| There was a notable paucity of examples on how data related to sexual assault, domestic violence, and other forms of gender-based violence are collected effectively. | |
| Key recommendations from the RFI responses | |
| Federal Government Role | The Federal Government should establish standard definitions. |
| | The Federal Government should also establish data infrastructure frameworks. |
| | The Federal Government should create an open architecture that would facilitate and promote standardized data collection and reporting by STLT law enforcement agencies. |
| | Communication and collaboration between the Federal Government, STLT law enforcement agencies, and software vendors are key to creating products that suit the needs of law enforcement officers. |
| STLT Resources | Use of shared resources through a cooperative system could help bolster the data collection efforts of small and resource-limited agencies. |
| | Law enforcement agencies need to build capacity—in technology, human capital, training, and other resources—in order to effectively capture data. |
| | Addressing barriers preventing widespread adoption of robust data collection efforts is key to increasing buy-in. |
| Data Collection, Use, Transparency | Making data available and accessible to stakeholders and the public is key to transparency and reducing disparity. |
| | Partnerships between law enforcement and community-based organizations can strengthen data collection practices while promoting public safety through a culturally informed and equitable lens. |
| | Auditing mechanisms should be established to verify the veracity of law enforcement-derived data. |

Key Findings

Criminal justice data are lacking, inconsistent, and dispersed. In general, the responses agreed that there are significant gaps in criminal justice data collection efforts that can prevent informative analysis, stunt reform, or exacerbate disparities. Gaps mentioned in the responses included lack of uniform data on law enforcement interactions involving people with mental health conditions and lack of data on individual characteristics that play into discrimination (e.g., skin color, hair texture, accent, religion, race, ethnicity).

Respondents noted also that data reporting requirements, capacity, and buy-in vary greatly across jurisdictions. Law enforcement agencies must meet new, continually issued data requirements issued by either Federal agencies or State agencies, which can make law enforcement agencies feel like they are trying to hit a “*moving target*.” Additionally, each of these required datasets may be housed in their own databases or call for different format requirements. This disparate system of data reporting makes the process significantly more time-consuming: separate and disjointed data collection systems and requirements, such as use-of-force data, make the process “*unwieldy*” and require more bandwidth to manually enter in data across different datasets.

There is a role for the Federal Government to play in standardizing and coordinating current criminal justice data collection efforts. There was wide agreement from STLT LEOs, academia, stakeholder groups/NGOs, and industry that the Federal Government has a role to play in guiding data collection efforts. While the extent and form of the Federal Government’s involvement varied, the examples provided in the responses included some form of guidance, standards, or requirements on what types of data are collected by law enforcement agencies; distributing funds to STLT agencies to build up their data collection capacity and infrastructure; imposing requirements on vendors to streamline data collection efforts; coordinating State-level data collection efforts; or investing and de-risking new data collection technologies. These suggestions, and others, are outlined further below as part of the discussion of recommendations for the Federal Government embodied in the RFI responses. Overall, STPI notes the responses generally agreed with the underlying premises of the questions in the RFI—that the Federal Government should play a role in this effort. Responses by STLT agencies were generally accepting of the concept of increased data collection, although they identified challenges. As the North Carolina Governor’s Crime Commission (GCC) noted,

It’s somewhat inaccurate to say that law enforcement agencies are unable or unwilling to collect data. In recent years law enforcement has shown to be very open to collecting new data. The issue comes with the technological and time challenges. Basically, collecting statistically accurate and viable data is not in the core mission of law enforcement. Collecting data becomes a burden when it is shoehorned into law enforcement’s daily workflow. We need to somehow learn to incorporate accurate and robust data collection into the common workday of law enforcement. We also need to make an effort to show law enforcement the value of these data and that the data is not being collected as a ‘gotcha.’

There were more responses explicitly favoring mandated data reporting than responses explicitly against mandated reporting. The degree of enforcement of data reporting requirements varied; there was more explicit support for mandated data reporting, which could be tied to Federal funding, while there was less explicit opposition to mandated data reporting. CEO Action for Racial Equity, Council on Criminal Justice, Esri,

the Federal Bureau of Investigation’s (FBI) Criminal Justice Information Services, the International Association of Chiefs of Police (IACP), In-Synch Systems, RTI International, SmartForce, The Sikh Coalition, Williams Institute at UCLA, and the Yale Justice Collaboratory all argued that voluntary data collection has not worked and has perpetuated gaps in data, with several of them recommending mandatory data reporting. On the other hand, some responses suggested that the Federal Government provide guidance and encourage, but not mandate, agencies to participate. For example, North Carolina GCC suggested that Federal models or standards should be used as a basis for State-level standards. The Federal Government should also provide some form of incentive for participation, financial or otherwise, to address the general lack of buy-in by law enforcement agencies.

There was a notable paucity of examples on how data related to sexual assault, domestic violence, and other forms of gender-based violence are collected effectively. Only two RFI responses were submitted to Question 13 that were germane to this topic—one by the Iowa Department of Public Safety (DPS), which noted that it collects domestic violence qualifiers to allow agencies to learn about trauma, how to recognize domestic abuse, and how to interact with the public through trauma-informed care. The other response was from SSB Digital, whose platform allows data to be displayed along various parameters such as type of crime and the gender of the victim and suspect/accused.

Key Recommendations from the RFI Responses

Recommendations related to the Federal Government’s role

The Federal Government should establish standard definitions. There was agreement that the Federal Government should standardize definitions, which are highly variable across jurisdictions. These definitions could then be applied to a Federal database or promulgated to STLT agencies, which would then implement these definitions into State-level databases. For example, definitions of “use of force” vary between States, cities, and even agencies. Standardizing terminology would not only clarify the process for law enforcement officers entering data but also allow for more robust analyses between datasets. This definition standardization could mirror efforts by the Federal Government in healthcare. Some responses suggested that special consideration should be given to the definitions of terms related to race and ethnicity to ensure harmonization with local understandings of race and ethnicity.

The Federal Government should also establish data infrastructure frameworks. These frameworks would include ontologies, taxonomies, data schema, privacy requirements, benchmarking metrics, auditing processes, and even image quality standards. The frameworks should also standardize how data are entered into and exported out of a system. At the same time, the framework would be flexible enough to incorporate new concepts and data. In addition to standard traffic stop and arrest data, the framework

would include standards to collect data on gender-based violence, hate crimes, and behavioral health-related calls.

The Federal Government should create an open architecture that would facilitate and promote standardized data collection and reporting by STLT law enforcement agencies. To address the multiple databases that exist across the country, several responses—including from STLT LEOs, industry, and stakeholder groups/NGOs—suggested that Federal and State Governments should play a role in centralizing databases and records management systems (RMSs) with varying degrees of centralization. At one end of the spectrum, Gathering for Justice called for a “*national and universal data platform that all law enforcement agencies are mandated to use, as it relates to incidents of excessive police violence, including homicides committed by police.*” Campaign Zero suggested centralizing Federal criminal justice data into one application programming interface.

At a more local level, North Carolina GCC suggested that the Federal Government provide basic RMSs, while other responses recommended that statewide data clearinghouses maintain and curate data that are normalized to a national standard. Iowa DPS focused on how, within agencies, there should only be one data platform that facilitates easier data collection and updates. Similarly, Valkyrie Intelligence suggested centralizing databases across city services such as homeless shelters and hospitals to inform officers’ judgments. Another model was proposed by Ratcliffe whereby “*the federal government would set the standard for data format, system security, and remote access*” as well as “*having a certification program for commercial products that certify that they are compatible with federal standards regarding data collection and remote access allowing data to be pulled by approved federal and state agencies.*”

Communication and collaboration between the Federal Government, STLT law enforcement agencies, and software vendors are key to creating products that suit the needs of law enforcement officers. Ensuring that products offered by vendors, such as RMSs, are informed by the everyday operations of law enforcement officers and are intuitive to use would increase buy-in and enable accurate data collection.¹ One industry response recommended the Federal Government establish a standard model that vendors could help implement. Another industry response suggested that a Federal standard would make products cheaper for police departments.

Recommendations related to STLT resources

Use of shared resources through a cooperative system could help bolster the data collection efforts of small and resource-limited agencies. As IJIS Institute suggested,

¹ Several industry responses highlighted their own companies’ products as examples of technologies that would meet law enforcement officers’ needs.

Small agencies will certainly benefit from collaborating with local agencies and partners by developing joint data sharing capabilities using a shared services model. This will help reduce the resource burden on any one agency and distribute the financial burden across partnering agencies and move towards more effective data sharing. Utilizing cloud-based solutions and standards like NIEM [National Information Exchange Model] or other standards can reduce the overall cost and additional resource needs.

Law enforcement agencies need to build capacity—in technology, human capital, training, and other resources—in order to effectively capture data. The most common barrier to accurate and robust data collection and publication cited in the responses was the lack of capacity among law enforcement agencies. Given the problems cited above including complicated data entry requirements and numerous reporting requirements, many of the responses noted that data management and analysis is one part of law enforcement’s job duties that can be particularly onerous; the Federal Government should play a role in building up this lack of capacity by issuing grants to agencies to augment their data infrastructure and to buy software.

The responses provided various recommendations on how law enforcement agencies could address their shortages in human capital. This could include hiring data analysts with expertise; using a co-op system to share data analysts across smaller, resource-limited agencies; hiring ethicists, sociologists, psychologists, etc. to diversify law enforcement programs; hiring Federal crime analysts who could provide analysis to local law enforcement; or forming partnerships with local universities to embed researchers in agencies to provide guidance and analysis.

Addressing barriers preventing widespread adoption of robust data collection efforts is key to increasing buy-in. Iowa DPS noted that *“if the ability to input data into either the local system or state system is not easily accessible, then the likelihood of obtaining complete data decreases.”* The responses offered various solutions to lower the barrier of entry to data collection. This included taking advantage of software solutions that save time writing reports, streamline case management, feature easily exportable reports and dashboards, automate data collection, and offer confidential surveys to build trust with the community. How these recommendations would be implemented is worth considering, given the concerns cited by multiple other responses that law enforcement has limited resources and funding. Measures for Justice offered the following consideration:

Departments are asked to juggle competing priorities for budget and resources, but if committed to using data for better decision-making and evaluation, incremental changes may be a more tangible and palatable option. It is difficult to ask officers to take additional time for record-keeping, especially in small departments, but nonprofit and philanthropic resources may be able to offset the burden while demonstrating the value of the entire department’s investment in better data collection.

Other responses noted the difficult process of navigating Federal databases such as the National Incident-Based Reporting System, Uniform Crime Reporting, and the FBI's National Use-of-Force Data Collection, with one response arguing that “*greatly simplifying the reporting process in virtually every category of reporting would result in more data being submitted.*”

In addition to making data entry and collection easier, some responses offered recommendations on increasing buy-in to data collection efforts. These included demonstrating to agencies what the data will be used for and correcting misconceptions, as well as providing resources alongside any local, State, or Federal requirements to build and sustain capabilities.

Recommendations related to data collection, use, and transparency

Making data available and accessible to stakeholders and the public is key to transparency and reducing disparity. In addition to collecting and standardizing data, releasing data to the public in an accessible format and making those data actionable is key to promoting transparency and reducing disparities in communities. As Axon summarized,

While there are increasing ways in which to review encounters between the public and the police, such as body-worn camera footage, there remains a critical scarcity of information provided directly by members of the public. Without collecting feedback from members of the public, entire categories of information (such as demographic data) remain unreliable and incomplete. As public access to information increases, accuracy of the data is essential to successfully build public trust and identify potential inequalities and disparities that people experience.

The National Alliance on Mental Illness noted in its response that releasing easily understandable reports for the public would make it easier for grassroots advocates to support effective policy change. The Sikh Coalition argued that sharing anonymized hate crime data with the community would “*help improve understanding of hate crimes, inform prevention and response strategies, and strengthen community trust in law enforcement.*” The Yale Justice Collaborative response cited a study published in *Science*, which found that considerable effort—including Freedom of Information requests and court orders—was required to assemble the data for analysis of use of force by the Chicago Police Department.

The release of public data could come in multiple forms: data could be released through publicly accessible (and understandable) dashboards and reports available on agency websites, through online data portals, through a standard and automated data request system for qualified researchers to access, or a tiered approach with varying levels of access based on the user (e.g., public versus academic researcher).

Partnerships between law enforcement and community-based organizations can strengthen data collection practices while promoting public safety through a culturally informed and equitable lens. In addition to partnerships helping to build capacity, partnerships can also promote data collection practices that are responsive to the needs of the community to improve public safety. As was stated in Wormeli Consulting’s response, to “*promote a more inclusive collection of justice researchers,*” the Bureau of Justice Statistics should contact institutions with underrepresented scholars to make them aware of data repositories, to provide tools for analysis, and to train researchers on how to use the data. Black-focused racial equity and STEM organizations such as the National Association for the Advancement of Colored People, Urban League, UnidosUS, Black in GeoScience, NorthStar of GIS, and the National Society of Black Engineers, which have trusted relationships with the community, can serve as key partners and can help develop appropriate metrics and data visualizations. Using cultural and community competency programs can “*help law enforcement understand the unique biases faced by specific communities.*”

There was some reticence expressed in both LEO and non-LEO responses about the willingness to address equity concerns. For example, Wormeli Consulting, referencing efforts to reduce disparities, said “*Very little has been done on this issue . . . will to do so is not common.*” The National Association of Criminal Defense Lawyers cited three studies showing that the New York, Chicago, and Los Angeles Police Departments have allegedly deleted data in response to legislation or internal policies meant to increase transparency. IACP submitted the following comment: “*If an agency were to talk about their efforts to reduce disparities in policing outcomes, they would likely take a beating in the popular press. You don’t get credit for trying to improve in cases where you have to expose that you may not have been perfect in the first round.*”

Auditing mechanisms should be established to verify the veracity of law enforcement-derived data. As Hamilton’s response noted, “*when these tasks are conducted internally within criminal justice agencies, there exists substantive potential for the invasion of conscious and unconscious biases and agendas of line staff and management.*” Partnering with non-law enforcement entities—such as independent researchers at universities, journalists, lawyers, and grassroots organizations—can help audit the data and “*increase the goals of transparency and appearance of legitimacy in the reported results.*” Three responses, submitted by Gathering for Justice, Prince William County PD, and The Sikh Coalition, recommended accountability measures such as an independent “watchdog” agency created by the government with the power to impose penalties or other regular independent audits to ensure that data are being accurately and consistently tracked. Building quality assurance processes into law enforcement data collection tools (e.g., checkboxes, drop-down menus) may also improve data quality.

Contents

| | | |
|----|---|----|
| 1. | Introduction and Summary of Responses Received..... | 1 |
| A. | Introduction and Approach..... | 1 |
| B. | Overall Summary of Responses | 2 |
| C. | Characterization of Responses | 2 |
| 2. | Question-by-Question Summaries..... | 5 |
| A. | Initial Questions Section of the RFI..... | 5 |
| 1. | Question 1: Existing Reports and Information..... | 5 |
| 2. | Question 2: Promising and Effective Models..... | 7 |
| 3. | Question 3: Datasets for Equitable Outcomes..... | 11 |
| 4. | Question 4: Communities of Practice and Collaborations | 14 |
| 5. | Question 5: What Is and Is Not Working Related to Disaggregated Data | 16 |
| 6. | Question 6: Challenges and Opportunities for Small STLT LEOs | 20 |
| 7. | Question 7: Opportunities for Improvement by Software Vendors | 22 |
| 8. | Question 8: Roles of Other Stakeholders | 25 |
| B. | Data Collection Section..... | 27 |
| 1. | Question 9: Federal Government Opportunities around Disaggregated Data Collection..... | 27 |
| 2. | Question 10: Standards for Reducing Barriers to Data Collection | 30 |
| 3. | Question 11: Models and Lessons Learned..... | 34 |
| C. | Use of Data Section..... | 38 |
| 1. | Question 12: Data Policies to Improve How Police Officers Interact with Underserved Populations..... | 38 |
| 2. | Question 13: Data Policies Related to Sexual Assault, Domestic Violence, and Other Gender-Based Violence | 39 |
| 3. | Question 14: Human Capital and Data Infrastructure Investments..... | 40 |
| 4. | Question 15: Roles of Philanthropic Organizations and Academic Researchers in Improving Data Collection and Use by Small STLT LEOs..... | 43 |
| D. | Data Transparency Section..... | 44 |
| 1. | Question 16: Police-Community Partnerships for Data Sharing..... | 44 |
| 2. | Question 17: LEO Data Sharing Regarding Reducing Disparities | 47 |
| 3. | Question 18: Data Sharing and Small STLT LEOs | 50 |
| 4. | Question 19: Access for Historically Underrepresented Scholars and Research Institutions to LEO Data..... | 52 |
| 5. | Question 20: Barriers and Opportunities for Improving Agency Participation in NIBRS..... | 53 |

| | | |
|----|---|-----|
| 6. | Question 21: Federal Data Sharing to Empower STLT Officials, Researchers, and Civil Society | 55 |
| 3. | Summary of Topic-Specific Responses..... | 57 |
| A. | Cheryl Phillips Individual Response | 58 |
| B. | Fons von Gessel Individual Response..... | 58 |
| C. | James Nolan Individual Response..... | 58 |
| D. | Jerry Garner Individual Response | 59 |
| E. | Jerry Ratcliffe Individual Response | 59 |
| F. | Joel Garner Individual Response..... | 60 |
| G. | M. Chris Cox Individual Response | 60 |
| H. | Mark Beaudry Individual Response | 61 |
| I. | Michael Melton Individual Response..... | 61 |
| J. | Philip Mathew Stinson Individual Response..... | 62 |
| K. | The Policy Lab at Brown University Academic Network | 62 |
| L. | Data Foundation Organizational Response | 63 |
| M. | Electronic Privacy Information Center Organizational Response | 64 |
| N. | ForceMetrics Organizational Response..... | 64 |
| O. | Full Circle Training Solutions Organizational Response..... | 64 |
| P. | Latinas in Law Enforcement Organizational Response | 65 |
| Q. | Major County Sheriffs of America Organizational Response..... | 65 |
| R. | National Policing Institute Organizational Response..... | 66 |
| S. | Project on Government Oversight Organizational Response..... | 67 |
| T. | Strategies for Youth Organizational Response | 68 |
| U. | Tech5 USA Organizational Response | 68 |
| V. | The Sikh Coalition Organizational Response | 68 |
| W. | Treatment Advocacy Center Organizational Response..... | 70 |
| X. | Vera Institute Organizational Response | 71 |
| | Appendix A. RFI Text | A-1 |
| | Appendix B. List of Respondents, by Organization Type | B-1 |
| | Appendix C. List of Data Sources from Question 1 | C-1 |
| | Abbreviations..... | D-1 |

1. Introduction and Summary of Responses Received

A. Introduction and Approach

On May 25, 2022, President Biden signed Executive Order 14074, which established and charged the Working Group on Criminal Justice Statistics with publishing a report to the President that “assesses current data collection, use, and data transparency practices with respect to law enforcement activities, including calls for service, searches, stops, frisks, seizures, arrests, complaints, law enforcement demographics, and civil asset forfeiture.”

To inform this report, the White House Office of Science and Technology Policy (OSTP) released a “Request for Information; Criminal Justice Statistics” on February 16, 2023 as part of their stakeholder engagement process. This request for information (RFI) closed on March 30, 2023. The RFI (the text of which is included as Appendix A) included 21 questions. Those questions were divided into four sections: a set of eight initial questions (Questions 1–8); three questions on Data Collection (Questions 9–11); four questions on Use of Data (Questions 12–15); and six questions on Data Transparency (Questions 16–21).

By the end of the comment period, 87 responses to the RFI were received. One response was linked to a Google Document, which was inaccessible as it could not be accessed either by Science and Technology Policy Institute (STPI) staff or by OSTP staff. STPI was asked by OSTP to assist in summarizing the RFI results to the extent feasible by April 7, 2023—8 days after the RFI closed.

STPI’s approach to analyzing the RFI followed its structure. We began by developing a deductive coding framework corresponding to the key phrases found in the RFI questions and sub-questions. We then extracted text from these RFI responses corresponding to each question. Once the text corresponding to each RFI question was extracted, we then mapped the text to the deductive coding framework to identify which responses were relevant to each portion of the RFI questions and to summarize relevant responses. Where the RFI responses to particular questions suggested that an alternative approach might produce a more useful summary, STPI staff instead summarized the responses based on how they answered the question rather than based on the structure of the original RFI question. Several responses, however, did not indicate that they were in response to a particular question or alternatively focused on a single law enforcement-related topic, even if portions of the response were listed as being in response to particular RFI questions. Rather than

mapping these responses to the questions, STPI staff summarized each of those responses as a whole in a separate chapter of the report.

B. Overall Summary of Responses

Of the 86 responses received and analyzed, 20 were provided by individuals, 5 were provided by academic research groups or research networks, and 61 on behalf of organizations (Table 1). The list of respondents can be found in Appendix B. Of the 20 individual responses, 11 were from academia, 3 from current or former state, tribal, local, or territorial (STLT) law enforcement professionals, 2 from current or former Federal law enforcement professionals (including one international response), 1 was from a journalist, and 3 did not provide institutional affiliations. Of the 61 institutional responses, 28 were on behalf of stakeholder groups such as non-governmental organizations (NGOs), 10 were on behalf of STLT law enforcement organizations (LEOs), 2 on behalf of research entities, 1 on behalf of a Federal LEO, 19 from industry, and 1 from an industry group (CEO Action for Racial Equity).

Table 1. STPI Characterization of RFI Responses by Organization Type

| Organization Type | Number of Individual Responses | Number of Responses by Academic Groups or Networks | Number of Institutional/Organizational Responses | Total |
|---|---------------------------------------|---|---|--------------|
| Academia/academic research group or network | 11 | 5 | 0 | 16 |
| STLT LEO | 3 | 0 | 10 | 13 |
| Federal LEO | 2 | 0 | 1 | 3 |
| Stakeholder groups/NGOs | 0 | 0 | 28 | 28 |
| Research Entities | 0 | 0 | 2 | 2 |
| Journalists | 1 | 0 | 0 | 1 |
| Industry | 0 | 0 | 19 | 19 |
| Industry Groups | 0 | 0 | 1 | 1 |
| Other/could not characterize | 3 | 0 | 0 | 3 |
| Total | 20 | 5 | 61 | 86 |

C. Characterization of Responses

Of the 86 responses analyzed, 62 addressed 1 or more of the RFI questions specifically. Ten responded to a single RFI question, 27 to between 2 and 5 questions, 12

to between 6 and 10 questions, 11 to 11 to 15 questions, and 2 to more than 15 questions, including 1 (Wormeli Consulting) that responded to all 21 questions (Figure 1). The largest number of responses were provided to Question 3 (36 responses), while 3 responses were provided to Question 13 and 5 responses to Question 15 (Figure 2). The average response rates for the questions were as follows: 22.88 responses were provided to the initial 8 questions, 20.33 responses to the Data Collection questions, 7.5 responses to the Use of Data questions, and 14 to the Data Transparency questions.

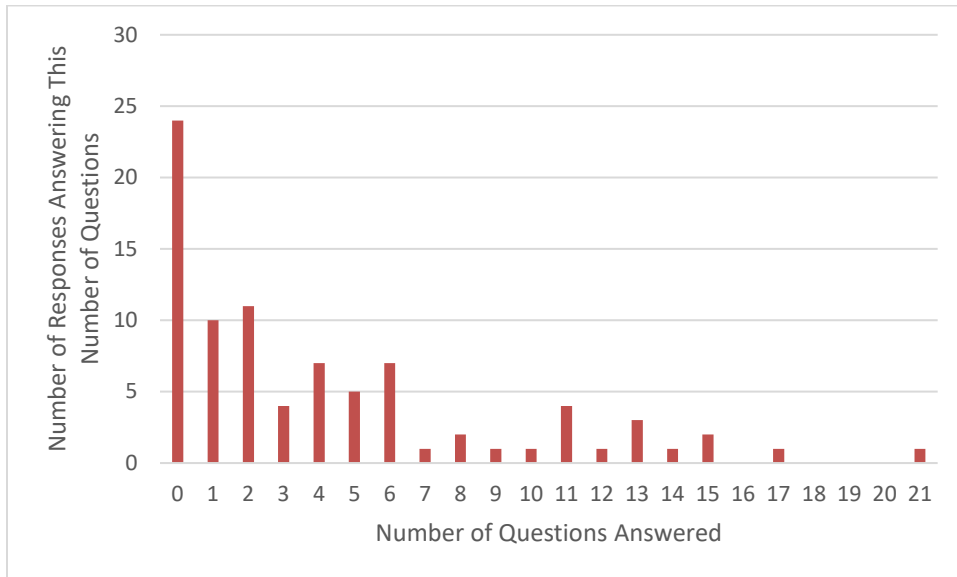


Figure 1. Number of Questions Answered by Respondents

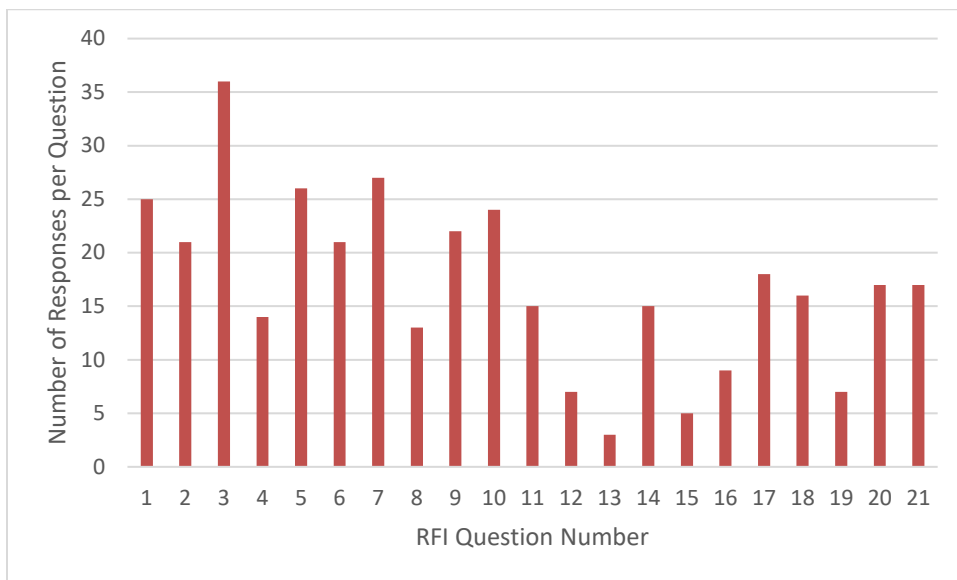


Figure 2. Number of Responses per RFI Question

Of the 24 responses (summarized in Chapter 3) that did not provide responses to any of the questions specifically, 10 were from individuals, 1 from an academic research group or network, and 13 were provided on behalf of institutions. On average, the individual responses were more likely not to answer any questions specifically (10 of 20 or 50%) as compared with 1 of the 5 academic networks (20%) and 13 of the 61 institutional responses (21%).

2. Question-by-Question Summaries

In this chapter, we summarize the responses to the individual questions in the RFI. The sections correspond to the sections of the RFI: the initial set of eight questions, the three Data Collection questions, the four questions on Use of Data, and the set of six Data Transparency questions. Sub-sections of the analysis correspond to the individual questions asked.

A. Initial Questions Section of the RFI

1. Question 1: Existing Reports and Information

Question 1 of the RFI sought the following information: *“What existing reports or research should the Federal Government review to better understand and assess the status of data collection, use, and transparency in STLT law enforcement agencies? What are the findings of researchers, groups, and organizations researching the status of law enforcement agencies’ data practices in general and disaggregated by sociodemographic and geographic variables in particular?”*

Twenty-six responses were received that were germane to Question 1 (Table 2). Responses mentioned specific reports or data sources (listed in Appendix C) and discussed findings.

Table 2. Respondents to Question 1

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Individual responses (5) | Coles, Hamilton, Laurisen, Roberts, Thieme |
| Federal LEO responses (1) | Federal Bureau of Investigation (FBI) Criminal Justice Information Services (CJIS) |
| STLT LEO responses (5) | International Association of Chiefs of Police (IACP), Iowa Dept. of Public Safety (DPS), Oregon Dept. of Public Safety Standards & Training (DPSST), Texas DPS, Virginia State Police |
| Stakeholder/NGOs responses (9) | Arnold Ventures, Campaign Zero, Council of State Governments, Council on Criminal Justice, Leadership Conference, Mapping Police Violence, National Alliance on Mental Illness (NAMI), National Association of Criminal Defense Lawyers (NACDL), and SEARCH |

| Respondent Type and Count | Respondents |
|------------------------------|--|
| Industry responses (5) | Benchmark Analytics, Jensen Hughes, LEFTA Systems, Valkyrie Intelligence, and Wormeli Consulting |
| Industry Group responses (1) | CEO Action for Racial Equity |

Fifteen responses also addressed the second half of question one. A common theme across many of those responses was that law enforcement agencies do not make timely high-quality data accessible to the public. Five responses (Coles individual response, Virginia State Police, Council of State Governments, Thieme individual response, and Arnold Ventures) emphasized that agencies either do not report data at all or are slow to update data in databases such as the National Incident-Based Reporting System (NIBRS). NIBRS itself was flagged by one response (SEARCH) as having challenges (costliness of implementation, lack of demonstrated operational benefits to NIBRS participation, concerns that adopting NIBRS will increase the number of publicly reported crimes, administrative burden on law enforcement officers, administrative burden of meeting Federal and State reporting requirements, lack of structure and definition of particular NIBRS data elements, and insufficient Federal outreach to STLT LEOs), that were identified in a report to the Department of Justice (DOJ) Bureau of Justice Statistics (BJS) in 1997 and are still present in the modern system.² Additionally, three responses (Council on State Governments, Thieme individual response, Council on Criminal Justice) highlighted that reporting is slow (months to years to data release) both to the FBI and by the FBI to the public.

Six responses (LEFTA Systems, Oregon DPSST, Council on State Governments, NAMI, Leadership Conference, Council on Criminal Justice) addressed issues with demographic data, reporting that either it is not tracked at all, or that it is not standardized and some jurisdictions have the officers report the race of those they interact with while others have individuals self-identify. One of those responses (Council of State Governments) noted that the challenges in standardization extend beyond race to definitions of use of force and other similar topics, and another response (NAMI) highlighted the lack of high-quality standardized data on law enforcement officer interactions with people with mental illness.

Another common focus was agency access to and use of data. Three responses (Campaign Zero, Valkyrie Intelligence, and Council on Criminal Justice) highlighted concerns that criminal justice data are often self-reported by agencies and lack third party

² The response referenced Roberts, David J. 1997. "Implementing the national incident-based reporting system: A project status report." U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics, Washington, DC. Available from: <https://www.ojp.gov/library/publications/implementing-national-incident-based-reporting-system-project-status-report>

validation, casting doubts on its veracity. Three responses (Council of State Governments, Lauritsen individual response, and Council on Criminal Justice) highlighted a need for law enforcement agency access to additional datasets either in their area of interest or on a national scale. In addition, two responses (Coles individual response and Jensen Hughes) noted that while agencies are doing a better job of collecting data, they either do not or cannot analyze it beyond State or Federal requirements. Finally, one response (Oregon DPSST) expressed the concern that more granular data reporting could allow for the identification of individual officers from smaller agencies.

2. Question 2: Promising and Effective Models

Question 2 of the RFI sought the following information: *“What are promising and effective models for, and what are lessons learned from, how law enforcement agencies collect, use, and share disaggregated data to inform policies, procedures, and training to reduce disparities in policing? What are some examples of law enforcement agencies using these models? Note: We are seeking models and examples that collect, use, and share disaggregated data while being intentional about when data are collected and shared, as well as how data are protected.”*

Twenty-one responses were received that were germane to Question 2 (Table 3). Responses discussed models, lessons learned, and examples, including examples of agencies using promising and effective models at the State level and the local level.

Table 3. Respondents to Question 2

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Individual responses (2) | Coles, Nix |
| Academic network responses (1) | Yale University Justice Collaboratory |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (3) | Minnesota Bureau of Criminal Apprehension (BCA), North Carolina Governor’s Crime Commission (GCC), and Virginia State Police |
| Stakeholder/NGOs responses (5) | Center for Policing Equity, Council of State Governments Justice Center, IJIS Institute, Mapping Police Violence, and National Association for the Advancement of Colored People (NAACP) Legal Defense Fund (LDF) |
| Industry responses (9) | Axon, Benchmark Analytics, Cyrun, LEFTA Systems, Mark43, SmartForce Technologies Inc., SSBI Digital, Tyler Technologies, and Wormeli Consulting LLC |

a. Responses related to models

Fifteen of the responses identified potential models or approaches to collecting, analyzing, and sharing disaggregated data. The most common response describing a “model” was a comprehensive portal, making use of standardized definitions and data collection approaches (Benchmark Analytics, FBI CJIS, LEFTA Systems, Mapping Police Violence, Mark43, Minnesota BCA, NAACP LDF, North Carolina GCC, SmartForce Technologies Inc.). Other responses described a variety of processes that might contribute to the effective collection, analysis, and sharing of disaggregated data, such as:

- Collaborations between police departments and other stakeholders, such as academia and NGOs (Benchmark Analytics, Coles);
- Analysis teams with specialized capabilities and skills inside police departments (Coles, Virginia State Police); and
- Peer-to-peer training and information sharing activities across LEOs (Council of State Governments Justice Center).

The IJIS response mentioned examples of non-criminal justice-related collaborations across stakeholders that were effective in collecting and sharing disaggregated data, such as the: “(1) National Suspicious Activity Reporting (SAR) Initiative (NSI) a joint initiative between DOJ, Department of Homeland Security (DHS), and Office of the Director of National Intelligence (ODNI); (2) the Prescription Drug Monitoring Program (PDMP) a DOJ/Center for Disease Control and Prevention (CDC) supported program; and (3) the Silicon Valley Regional Data Trust (SVRDT), a regional program supported by education, justice and health and human services in California.” The Council of State Governments Justice Center discussed alternative crisis response efforts as a model for improving outcomes.

b. Responses related to lessons learned

Eight of the responses were considered by STPI staff to be identifying lessons learned, although in some cases those “lessons learned” overlapped with the discussion of models, especially with respect to creating common data types and standards:

- Lessons learned related to common data types and standardization
 - Develop Federal models or standards that can serve as the basis for State-level standards, such as in the case of use-of-force reporting or death in custody reporting (North Carolina GCC).
 - Require common naming conventions or variable names to facilitate standardized statewide data collection (LEFTA Systems).
 - Standardize input data (SSB Digital).

- Create a standard and then fund vendors to implement it (Cyrus).
- Provide common definitions and best practices for capturing information (Benchmark Analytics).
- Other lessons learned statements
 - Balances between transparency and privacy can be developed so that data can reside securely on the data owners’ systems while access controls allow role-based access (Axon, IJIS Institute, Tyler Technologies).
 - Incident-level information should encompass a wide range of interactions between police and citizens and contextual information such as demographics and geographic location (Center for Policing Equity).
 - Building quality assurance processes into law enforcement data collection tools (e.g., checkboxes, drop-down menus) improves data quality (Center for Policing Equity).

c. Examples of agencies using promising and effective models at the State level

Several statewide examples were provided:

- California, especially with respect to traffic stop data (Center for Policing Equity, LEFTA Systems, Mapping Police Violence, NAACP LDF, Nix).
- Connecticut traffic stop data (Center for Policing Equity, Council of State Governments Justice Center).
- Minnesota (Minnesota BCA).
- New Jersey use-of-force data (Benchmark Analytics, Mapping Police Violence).
- Texas (Benchmark Analytics, Nix).

“California and Texas are the trailblazers. Two of our largest states, each with a diverse set of large and small, urban and rural agencies, and they’re both collecting better incident-level use of deadly force data than the Federal Government . . . it’s because they had the power to mandate it at the state legislative level.” – Nix

d. Examples of agencies using promising and effective models at the department/locality level

Many examples of local LEOs were provided, especially with respect to building municipal dashboards to display criminal justice statistics:

- Alliance, NE (Nix)
- Baltimore, MD (NAACP LDF)
- Chandler, AZ (NAACP LDF)

- Chattanooga, TN (Tyler Technologies)
- Cincinnati, OH (NAACP LDF)
- Colorado Springs, CO (Tyler Technologies)
- Dallas, TX (Nix)
- Denver, CO (Nix)
- Montgomery County, MD (NAACP LDF)
- New Orleans, LA (NAACP LDF)
- New York City, NY (Nix)
- Phoenix, AZ (NAACP LDF)
- Portland, OR (NAACP LDF)
- Sacramento, CA (NAACP LDF)
- San Diego, CA (NAACP LDF)
- Seattle, WA (NAACP LDF)
- Tucson, AZ (NAACP LDF)

e. Other points made

- The FBI's data collections (NIBRS, N-DEx) and data display tools (Crime Data Explorer) were identified as models in the FBI CJIS and Mark43 responses.
- The Center for Policing Equity was identified as an example of a third-party organization that is skilled in working with LEOs to analyze their data (Coles).
- The NAACP LDF response identified gaps in some of the data collections they had identified as models, such as the Baltimore and Chandler municipal dashboards do not include information on mental health or disabilities issues in their 911 call data; the Portland municipal dashboard includes information on police use of force but not the extent of injury (or whether the subject was killed); and the California statewide stop data does not include information on the extent of injury or whether the subject was killed.
- The Yale Justice Collaborative response, in describing an analysis published in *Science* regarding use of force by the Chicago Police Department, noted that considerable effort, including Freedom of Information Act requests and court orders, was required to assemble the data for analysis.

3. Question 3: Datasets for Equitable Outcomes

Question 3 of the RFI sought the following information: “*What datasets are critical for law enforcement agencies to collect in order to ensure the comprehensive and disaggregated collection of operational data, incident-based datasets, and other data to produce more equitable outcomes? Why?*”

Thirty-six responses were received that were germane to Question 3—the most of any of the questions associated with the RFI (Table 4).

Table 4. Respondents to Question 3

| Respondent Type and Count | Respondents |
|---------------------------------|--|
| Individual responses (5) | Coles, Hamilton, Lauritsen, Nix, Rineer, Roberts |
| Academic network responses (2) | NYU, The Policing Project, Williams Institute at UCLA |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (6) | Iowa DPS, Minnesota BCA, North Carolina GCC, Oregon DPSST, Texas Department of Public Safety, Virginia State Police |
| Stakeholder/NGOs responses (10) | Center for Policing Equity, Council on Criminal Justice, IJIS Institute, Measures for Justice, NAACP LDF, NACDL, NAMI, National Disability Rights Network [NDRN], National Police Accountability Project |
| Research entities responses (1) | RTI International |
| Industry responses (10) | Axon, Benchmark Analytics, Cyrun, Jensen Hughes, Mark43, SmartForce Technologies Inc., SSBI Digital, TEI Software Development, Valkyrie Intelligence, Wormeli Consulting LLC |
| Industry Group responses (1) | CEO Action for Racial Equity |

The various responses mentioned several types of disaggregated data. The most commonly mentioned data types were:

- Calls for service (Axon, Center for Policing Equity, Coles, FBI CJIS, Jensen Hughes, Mark43, Measures for Justice, NAACP LDF, RTI International, Wormeli Consulting).

- Contact and stop data (Center for Policing Equity, Council on Criminal Justice, Jensen Hughes, Measures for Justice, NAACP LDF, NACDL, National Police Accountability Project, Oregon DPSST, Policing Project at NYU, RTI International, SmartForce Technologies Inc., Valkyrie International, Virginia State Police).

“In order to address racial disparities and inequities in traffic stops, it is critical that police departments collect data on all traffic stops conducted, including the purported reason(s) for the stop, the race of the stopped driver, and whether a search and/or arrest was made. This data will enable communities to understand how frequently drivers of color are targeted for traffic stops, how often those stops are for highly discretionary, low-danger reasons such as a broken headlight or tinted windows, and how regularly those stops escalate into increasingly intrusive law enforcement contact, such as questioning, a search, or even arrest.”

– National Police Accountability Project

- Incident-based data such as information that is incorporated into NIBRS (Axon, Center for Policing Equity, FBI CJIS, IJIS Institute, Jensen Hughes, Measures for Justice, Minnesota BCA, North Carolina GCC, Roberts, RTI International, SmartForce Technologies Inc., TEI Software Development, Virginia State Police, Texas DPS, Williams Center, Wormeli Consulting).
 - Geomapping/Policing “hot spots” with census data overlaid (Axon, Coles, IJIS Institute, Texas DPS).
 - Geographically-coded incident data (Iowa DPS, Minnesota BCA, SmartForce Technologies Inc.), including at the sub-city level such as by census tract or address (Roberts).
 - More complete information on the demographics of arrestees and victims (IJIS Institute, Minnesota BCA, Roberts, SSB Digital, Valkyrie Intelligence).
 - Arrest data (Jensen Hughes, Mark43, NAACP LDF).
- Police use of force including non-lethal uses of force (Benchmark Analytics, Council on Criminal Justice, IJIS Institute, Jensen Hughes, Mark43, NAACP LDF, NACDL, National Police Accountability Project, Nix, Policing Project at NYU, RTI International, SmartForce).
- Officer misconduct data such as complaints, claims, and lawsuits filed against LEOs (Benchmark Analytics, CEO Action for Racial Equity, Jensen Hughes, Measures for Justice, NACDL, National Police Accountability Project, Policing Project at NYU).
- Operational data, including:

- Officer training and performance data (IJIS Institute, Measures for Justice, SmartForce);
- Police deployment data (Axon, Measures for Justice, NACDL, Valkyrie Intelligence); and
- Community engagement data (Jensen Hughes, Measures for Justice, SmartForce Technologies Inc., RTI International).

Even when responses identified common types of data, they did not necessarily agree on the purpose and nature of disaggregation. For example, both the Coles and the Wormeli Consulting responses considered calls for service to be critical data to collect. The Coles response focused on call for service data as a means to understand alternatives to uses of force—where the data to be collected for disaggregation included: “who called, what was the issue, how was the issue resolved, what resources were deployed, how did the community member rate the effectiveness of the intervention, what did they need that police could NOT provide, who could provide it, what impact would that have made, etc.” The Wormeli Consulting response focused on equitable treatment in policing, and suggested “these two primary datasets [calls for service and incident-based data] should include the demographic variables related to the participants (all parties, including the responding officers), the context of the incidents including environmental variables, and the results of the interaction of the participants (harm done, or lack thereof) as well as the variables that describe the included offenses.”

- Other types of data mentioned by one or two responses were:
 - Gun violence data, with disaggregation by type of firearm used (Rineer)
 - Policing contacts with disaggregation by demographic data (SmartForce Technologies Inc.)
 - Arrested individuals by type of weapon (Nix)
 - Criminal history data (Texas DPS)
 - Gun violence against officers (Nix, Oregon DPSST)
 - Time-stamped data (Iowa DPS)
 - Hate/bias crime data (SmartForce Technologies Inc.)
 - Search warrants (Mark43)
 - Case outcomes (Measures for Justice, Williams Center)
 - Offense codes (Williams Center)
 - Prosecutorial data including declined prosecutions (NAACP LDF, NACDL)
 - Exonerations (NACDL)

- Digital evidence/metadata (IJIS Institute)
- Device-generated data (Policing Project at NYU)
- Audio and video data (RTI International)
- External data such as State DMV databases, STLT Automated License Plate Reader (ALPR) databases, social media databases, and stolen property databases at the State and national level (FBI CJIS)
- Use of surveillance technologies (NAACP LDF)
- Data on police responses to protest (NAACP LDF)
- Deaths in custody (National Police Accountability Project)
- Commendations (Jensen Hughes)

Some responses identified gaps or made recommendations as to how to improve data collection, such as:

- Incorporating information on mental health and disability status into call for service and incident-based data collection (NAACP LDF, NAMI, NDRN).
- Adding original offense codes (Williams Institute), State-level crime/offense codes (TEI Software) to NIBRS.
- Need for a national, mandatory, standardized, incident-based data collection system (CEO Action for Racial Equity, Gathering for Justice).

4. Question 4: Communities of Practice and Collaborations

Question 4 of the RFI sought the following information: *“What communities of practice or collaborations can law enforcement agencies participate in to improve how they collect comprehensive, quality, and disaggregated data to identify and address disparities? How can the Federal Government encourage and support the development of collaborations to further promote the exchange of ideas and best practices?”*

Fourteen responses were received that were germane to Question 4 (Table 5).

Table 5. Respondents to Question 4

| Respondent Type and Count | Respondents |
|--------------------------------|--|
| Individual responses (2) | Caplan, Coles |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (5) | Iowa DPS, Minnesota BCA, North Carolina GCC, Prince William County PD, Texas DPS |
| Stakeholder/NGOs responses (3) | Center for Policing Equity, IJIS Institute, NAMI |

| Respondent Type and Count | Respondents |
|------------------------------|-------------------------------|
| Industry responses (2) | Mark43 and Wormeli Consulting |
| Industry Group responses (1) | CEO Action for Racial Equity |

There were no explicit differences between the two halves of the question—some responses described a particular activity as a partnership type and others as being an action that the Federal Government should incentivize. Types of responses received were:

- Communities of practice
 - Partnerships with local and community organizations (CEO Action for Racial Equity, Center for Policing Equity, Coles, IJIS Institute, Prince William County Police Department, Texas DPS, Wormeli Consulting)
 - including mental health organizations (NAMI)
 - use risk-based policing as a specific mechanism for promoting partnerships with community organizations (Caplan)
 - Partnerships with academia (Center for Policing Equity, Prince William County Police Department, Wormeli Consulting)
 - Partnerships with policymakers (Wormeli Consulting)
 - Partnerships with industry/makers of RMS tools (Caplan)
 - Partnerships across STLT organizations, including across State boundaries (Iowa DPS)
 - Partnerships through national organizations such as:
 - the Association of State Uniform Crime Reporting Programs or ASUCRP (FBI CJIS, Iowa DPS, Minnesota BCA, Texas DPS)
 - IJIS Institute (FBI CJIS, Texas DPS)
 - the Police Data Initiative, the IACP, the National Police Foundation, the National Sheriff’s Association, and the American Probation and Parole Association (FBI CJIS)
 - Work with the Center for Policing Equity (Center for Policing Equity)
 - Work with the CJIS Advisory Process Board (FBI CJIS)
- Federal roles
 - Foster partnerships across STLT organizations, including across State boundaries and through national organizations (Coles)

- Fund networking activities with community groups (FBI CJIS, IJIS Institute)
- Publicize best practices (IJIS Institute)
- Foster outreach through online training, newsletters, and emails (Iowa DPS)
- Participate in STLT meetings such as Sheriff’s Association conferences to “provide feedback and gather ideas” (Texas DPS)
- Leverage funding through the Department of Health and Human Services (e.g., the Substance Abuse and Mental Health Services Administration or the National Institute of Mental Health) to support collaborations
- Provide States funding and support to develop national and State standards (FBI CJIS, North Carolina GCC)
- Provide models of how disaggregated analysis or equity-promoting analyses could be accomplished (Wormeli Consulting)
- Use the National Information Exchange Model (NIEM) and open data standards to promote standard data collection across programs (North Carolina GCC)
- Place terms and conditions on grants to require involvement of researchers or other users (Center for Policing Equity, Wormeli Consulting)
- Incorporate performance measures into funded activities (IJIS Institute)

5. Question 5: What Is and Is Not Working Related to Disaggregated Data

Question 5 of the RFI sought the following information: “*What is and is not working regarding how the Federal Government supports the collection, use, and transparency of disaggregated data on law enforcement activities, and why?*”

Twenty-six responses were received that were germane to Question 5 (Table 6). Responses tended to highlight what is not working rather than what is working.

Table 6. Respondents to Question 5

| Respondent Type and Count | Respondents |
|--------------------------------|--|
| Individual responses (2) | Coles, Mitchell |
| Academic network responses (2) | NYU, The Policing Project, Williams Institute at UCLA |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (5) | IACP, Iowa DPS, Minnesota BCA, North Carolina GCC, Texas DPS |

| Respondent Type and Count | Respondents |
|---------------------------------|---|
| Stakeholder/NGOs responses (4) | Center for Policing Equity, Council on Criminal Justice, Mapping Police Violence, SEARCH |
| Research entities responses (1) | RTI International |
| Industry responses (10) | Axon, Benchmark Analytics, Cyrun, Esri, In-Synch Systems, LEFTA Systems, Mark43, SmartForce Technologies Inc., TEI Software Development, and Wormeli Consulting |
| Industry Group responses (1) | CEO Action for Racial Equity |

a. What is working

Reponses identified efforts they described as “working.” Most of these responses mentioned Federal efforts that are deemed successful:

- Federal efforts identified as “working”:
 - Having designated staff assigned to States and programs to provide timely feedback (Iowa DPS).
 - Establishing initiatives such as NIBRS (SmartForce Technologies Inc., Wormeli Consulting).
 - Crime Data Explorer and other FBI mechanisms for accessing Uniform Crime Reporting (UCR) data (Minnesota BCA, SEARCH).
 - The UCR portal for STLT LEOs to input data (Minnesota BCA).
 - UCR outreach and training efforts (FBI CJIS).

“The FBI’s implementation of Crime Data Explorer (CDE) crime data to augment the annual publication of Crime in the United States has been helpful to provide more timely access to crime data.” – Minnesota BCA

- NCS-X awards for modernizing collection and transmission of statewide UCR data (TEI Software Development).
- Providing guidelines and resources (SmartForce Technologies Inc.).
- Encouraging collaboration through initiatives such as the 21st Century Policing Task Force (SmartForce Technologies Inc.).
- Incorporating compliance into the terms and conditions of grants (TEI Software Development).
- STLT efforts identified as “working”
 - Louisiana’s effort to collect incident data statewide, including development of a common, no-cost RMS for smaller LEOs and outreach and training activities (TEI Software Development).

“Louisiana has a state data repository and data analytic system for incident-based data supported by the program staff from the Commission on Law Enforcement and Louisiana Sheriffs Association. Automated notifications, constant outreach by the state to the LEAs [law enforcement agencies], and real-time transparency for crime analytics to each participating LEA are necessary. The Louisiana staff are constantly calling and working with LEAs on training and data quality issues that arise. If the state did not have a solution, compliance would likely drop off. In combination with the State Repository and analytic solution, the Louisiana Commission on Law Enforcement and Louisiana Sheriffs Association partnered with TEI to provide a no cost RMS solution for medium to small law enforcement agencies. This program is funded through various grants and state funds. Currently about 80 agencies are using this solution and provide an avenue for collecting data from agencies that would not normally have the funds or IT resources to obtain a record management system that reports State and Federal Crime submissions.”

– TEI Software Development

b. What is not working

More responses were received with respect to deficiencies or what is not working than with respect to what is working. Three common themes were identified in the responses:

- Lack of checks and balances/inconsistency in data standardization and quality in UCR data (Center for Policing Equity, Coles, Esri, In-Synch Systems, SmartForce Technologies Inc., Texas DPS).
- Voluntary rather than mandatory data collection, for example the National Use-of-Force Data Collection (CEO Action for Racial Equity, Council on Criminal Justice, Esri, FBI CJIS, IACP, In-Synch Systems, RTI International, SmartForce Technologies Inc., Williams Institute at UCLA, Yale Justice Collaboratory).

- Limited data collection scope (e.g., National Use-of-Force Data Collection does not include all types of uses of force; NIBRS should include the response of the criminal justice system, deaths in custody, and all interactions with the public, including traffic stops) (Center for Policing Equity, Esri, IACP, LEFTA Systems, SmartForce Technologies Inc., TEI Software Development, Wormeli Consulting).
- Additional topics identified in one or two responses as “not working” were:
 - Lack of communication within Federal agencies leading to duplicative inquiries (Iowa DPS, North Carolina GCC).
 - Lack of a single consistent data collection hub across all Federal programs, for all States (North Carolina GCC).
 - Collection of unnecessary information leading to administrative burden on STLT LEOs (e.g., height and weight data for Use-of-Force Data Collection) (LEFTA Systems).
 - Administrative burden specifically on smaller STLT LEOs and need for differential data collection by size of department (RTI International).
 - Need to balance transparency with privacy—need clear guidelines on data sharing that preserve individual privacy (SmartForce Technologies Inc.).
 - Insufficient Federal funding to incentivize transition by STLT LEOs to better statistical data collection systems (Center for Policing Equity, FBI CJIS).
 - Policing data is collected through systems designed to support law enforcement workflows rather than to capture data for statistical purposes (Mitchell).
 - Differences between State and Federal data requirements (TEI Software Development).

“There seems to be overlap and lack of communication between many of the federal data collection programs. They lack consistency in their development and support. An effort should be made at the federal level to coordinate data collection efforts between the various agencies. Maybe even working towards a single data collection point for the states to work with. While not all data submitters at the state level will be from the same agency, a single consistent data collection hub at the federal level would be very helpful.”

– North Carolina GCC

- Limited information sharing from NIBRS back to police departments (Cyrus).
- Limited transparency of Use-of-Force dataset—information is not sufficiently available to the public (Mapping Police Violence).
- Need for expanded and more regular collection of Law Enforcement Management and Administrative Statistics (LEMAS) information (Mapping Police Violence).
- Need for Federal collection of information regarding citizens’ perceptions of police (Mapping Police Violence).
- The National Decertification Index is incomplete and insufficient to provide information regarding decertified officers (Benchmark Analytics).
- Need for a national database of disciplined officers/police accountability database (CEO Action for Racial Equity).
- Vendors and academics/researchers not involved in the design of Federal criminal justice statistical collections (Mark43).
- Funding technology and personnel through grants (rather than long-term support mechanisms) leads to a lack of sustainability once awards close (Axon).

6. Question 6: Challenges and Opportunities for Small STLT LEOs

Question 6 of the RFI sought the following information: *“What specific challenges and opportunities do small and resource-constrained STLT law enforcement agencies face in the collection, use, and transparency of disaggregated data to inform more equitable outcomes?”*

Twenty-one responses were received that were germane to Question 6 (Table 7). Responses discussed both challenges and opportunities.

Table 7. Respondents to Question 6

| Respondent Type and Count | Respondents |
|--------------------------------|--|
| Individual responses (1) | Coles |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (5) | IACP, Iowa DPS, North Carolina GCC, Minnesota BCA, Texas State Police |
| Stakeholder/NGOs responses (4) | Center for Policing Equity, IJIS Institute, Measures for Justice, and SEARCH |

| Respondent Type and Count | Respondents |
|---------------------------------|--|
| Research entities responses (1) | RTI International |
| Industry responses (8) | Axon, Cyrun, In-Synch Systems, Jensen Hughes, LEFTA Systems, Mark43, Valkyrie Intelligence, Wormeli Consulting |
| Industry Group responses (1) | CEO Action for Racial Equity |

a. Challenges

The large majority of responses that discussed challenges focused on capacity limitations associated with small STLT organizations, primarily:

- No specialized staff working on data collection/data collection is one of several roles officers need to carry out/limitations on training and skills (Coles, Axon, Center for Policing Equity, Cyrun, In-Synch Systems, Iowa DPS, Jensen Hughes, LEFTA Systems, Mark43, Measures for Justice, Minnesota BCA, North Carolina GCC, RTI International, SEARCH, Texas Department of Public Safety, Valkyrie Intelligence, Wormeli Consulting).
- Small agencies may not have sufficient funding to invest in records management systems (RMS) or other methods of capturing disaggregated data (Axon, Center for Policing Equity, CEO Action for Racial Equity, Cyrun, FBI CJIS, IJIS Institute, IACP, Iowa DPS, Jensen Hughes, LEFTA Systems, Mark43, Measures for Justice, Minnesota BCA, North Carolina GCC, RTI International, SEARCH, Texas Department of Public Safety, Wormeli Consulting).

Some responses contained additional mentions of challenges related to lack of standardization, administrative burden, and policy requirements:

- “The main problem is that each municipality is making their own decisions on systems and capabilities without regard to national standards” (IACP).
- “One thing we cannot optimize is the certification process. State to state this varies, from a simple ‘submit 3 months’ worth of valid data’ to a multi-day on-site audit or even whole sets of test-questions that the agency must enter and submit” (In-Synch Systems).
- “Additionally, union contracts and legislative requirements may dictate the reliable governance and privacy of certain data types (PII [personally identifiable information], personnel records, discipline, etc.), further straining resources” (Measures for Justice).
- “Asking for small agencies to report on data differently or in new ways is viewed as a burden. Any new data collection efforts should be framed within the

processes already being conducted or should lessen the existing burden” (RTI International).

b. Opportunities

There were mentions of opportunities that represented the inverse of the challenges. While resources and cost of software were mentioned as a capacity challenge, four responses identified improvements in software—to allow low-cost creation of dashboards, the promise of voice-to-text systems to automate data input, and mentions of open-source approaches—as a means to overcome that challenge (FBI CJIS, In-Synch Systems, Measures for Justice, Valkyrie Intelligence). Another type of opportunity identified relates to partnerships or sharing of resources across LEOs (Jensen Hughes, Mark43). The IACP approach identified national standards as a means to overcome the complexities associated with a multiplicity of data collection approaches.

The Wormeli Consulting response additionally pointed to Federal Government opportunities for addressing these capacity limitations, stating, “The federal government needs to supply both funding and technical assistance to move the law enforcement field forward on these issues. Research programs can create the kinds of datasets needed on an experimental basis, to help define the standards more clearly and help set the stage for consistent and comparable datasets from all agencies. It is important to make clear to agencies and technologists (in government or industry) who build information systems that the choice of and standard for including data elements in information systems must consider the need for statistical sufficiency in how the data is represented.”

7. Question 7: Opportunities for Improvement by Software Vendors

Question 7 of the RFI sought the following information: *“How can software vendors (including those that build records management systems (RMS) and other systems) improve software design, development, and deployment to reduce barriers for law enforcement agencies to collect, use, and share comprehensive, quality, and disaggregated data and further incentivize them to produce more equitable outcomes?”*

Twenty-seven responses were received that were germane to Question 7 (Table 8).

Table 8. Respondents to Question 7

| Respondent Type and Count | Respondents |
|--------------------------------|----------------------------|
| Individual responses (1) | Coles |
| Academic network responses (1) | Yale Justice Collaboratory |
| Federal LEO responses (1) | FBI CJIS |

| Respondent Type and Count | Respondents |
|---------------------------------|--|
| STLT LEO responses (7) | IACP, Iowa DPS, Minnesota BCA, North Carolina GCC, Prince William County PD, Texas DPS, Virginia State Police |
| Stakeholder/NGOs responses (6) | Center for Policing Equity, IJIS Institute, The Leadership Conference on Civil and Human Rights, Measures for Justice, NACDL, SpotCrime |
| Research entities responses (1) | RTI International |
| Industry responses (10) | Axon, Benchmark Analytics, Esri, In-Synch Systems, Jensen Hughes, LEFTA Systems, Mark43, SSBI Digital, Valkyrie Intelligence, Wormeli Consulting |

There was not a clean distinction between responses intending to answer the “improve” and “incentivize” aspects of Question 7. STPI staff instead distinguished between responses that touched upon technical aspects of software design and responses that mentioned actions that an RMS provider might take either during the software design phase or during support/training/implementation phases of a software implementation.

a. Software design-related responses

Responses made two types of suggestions with respect to software design. One set of suggestions regarded software architecture considerations, such as:

- Shift toward open source approaches and architectures, including specific references to making use of the NIEMOpen standard (Mark43, Measures for Justice, Minnesota BCA, NACDL, North Carolina GCC).
- Shift toward cloud-based products that could be deployed (with customization) to many STLT LEOs (Benchmark Analytics, NACDL, RTI International).

A second set of suggestions referenced useful design features that RMS software should incorporate, such as:

- Design for interoperability and ease of data linking and data sharing across systems (Axon, Esri, FBI CJIS, IJIS Institute, Iowa DPS, Measures for Justice, SSB Digital).
- Design for ease of use, including embedded QA/QC features (Axon, Esri, LEFTA Systems, Prince William County PD, Texas DPS).
- Design for customization (Center for Policing Equity).
- Design for easy updating as standards change (Virginia State Police).
- Design for ease of development of output such as dashboards or reports (Axon, Center for Policing Equity).

b. Actions to be taken to enhance utility during the design or the support/training/implementation phases

Responses to Question 7 regarding the non-software aspects of opportunities for improvement by RMS vendors were also varied. Three themes were identified across multiple responses. First, RMS vendors should be knowledgeable of the activities and workflows of LEOs, including embedding software development personnel in LEOs to gain an understanding of police procedures and terminology (Esri, Mark43, SSB Digital, Valkyrie Intelligence). Second, there should be closer collaboration between RMS vendors and Federal statistical data collection programs (IACP, IJIS Institute, North Carolina GCC, Prince William County PD). Third, standardization of collections and mandating common variables—whether across States or between States and Federal programs—will improve design (Center for Policing Equity, In-Synch Systems, Iowa DPS, Minnesota BCA, North Carolina GCC, Texas DPS). Additional points made in individual responses were:

- Identify how to incorporate training on the RMS into the training lifecycle of police officers (Coles, Esri).
- Identify who within the LEO organization is responsible for managing the RMS system (Coles).
- Slow the pace of changes to data standards to ease administrative burden associated with upgrading (North Carolina GCC).
- Incorporate data elements beyond those required by NIBRS to facilitate disaggregated analyses (Wormeli Consulting).
- Encourage local LEOs within a State to pool resources to deploy a common RMS at a county or regional level (RTI International).

The most commonly mentioned Federal incentives were for funding for software development and upgrading, including funding for a universal, simple RMS that small STLT LEOs could employ (Cyrus, NACDL, North Carolina GCC, Yale Justice Collaboratory).³ These responses were phrased as “the Federal Government should fund” generically and did not refer to expanding or modifying existing Federal programs. Other incentives mentioned were:

- Promulgate guidance documents (Texas DPS, Wormeli Consulting);
- Require private vendors to make data public (SpotCrime);
- Pre-qualify vendors that meet specified security/feature/support capabilities (Tyler Technologies);

³ The RTI International response, in a variation on this theme, suggested that individual States could also develop and deploy a common RMS at no cost or low cost to smaller police departments.

- Impose a price cap on software and associated services (Center for Policing Equity); and
- Maintain close relationships with State criminal justice data program managers (Virginia State Police).

8. Question 8: Roles of Other Stakeholders

Question 8 of the RFI sought the following information: *“How might professional, academic, nonprofit, and philanthropic organizations support and/or make investments to help law enforcement agencies advance equitable and disaggregated data practices?”*

Thirteen responses were received that were germane to Question 8 (Table 9).

Table 9. Respondents to Question 8

| Respondent Type and Count | Respondents |
|--------------------------------|--|
| Individual responses (1) | Coles |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (4) | IACP, North Carolina GCC, Texas Department of Public Safety, Virginia State Police |
| Stakeholder/NGOs responses (3) | Gathering for Justice, IJIS Institute, Measures for Justice |
| Industry responses (4) | Axon, Cyrun, Valkyrie Intelligence, Wormeli Consulting |

Some of the responses identified particular types of groups such as academics or professional organizations (including naming individual organizations) while other responses identified types of activity but did not specify particular groups or organizations. Responses were classified by STPI as:

- Advocate for policy change
 - Generic: “Stakeholders in the position to advocate for policy change in these areas can alleviate some of the cultural reluctance historically tied to disaggregated data practices” (FBI CJIS).
- Analyze data or provide quality assurance
 - Generic: “The offering of services for quality control, additional analysis, location specific review of data submitted would greatly improve the data received” (Virginia State Police).
- Change professional culture
 - Professional organizations: Law enforcement professional organizations should focus more heavily on data and data analysis in educating law

enforcement officers (North Carolina GCC, Wormeli Consulting). The Wormeli Consulting response specified particular organizations:

- “IACP, PERF, and the National Institute of Police [sic]⁴ can convene discussions among members.”
- IJIS Institute “can be and has been a catalyst for change that can provide a direct route to the software providers who most heavily influence their customers.”
- Convene or develop strategies
 - NGOs: (IJIS Institute, Measures for Justice)
 - Measures for Justice response named Ford Foundation, Arnold Ventures
 - Generic: “These types of organizations can bring together resources that are technologically agnostic and create standards for the greater community” (IACP). The FBI CJIS response also identified the need for convening without specifying stakeholder groups.
- Fund or provide technical assistance
 - NGOs: (IJIS Institute, Measures of Justice, Wormeli Consulting)
 - Academia: Train specifically around the value and complexities of predictive policing and other artificial intelligence- or machine learning-enabled tools (Valkyrie Intelligence).
 - Generic: “Provide funding in the form of grants” (Cyrus). The FBI CJIS and Texas DPS responses also mentioned the need for funding and technical assistance without specifying who might be involved.
- Participate on advisory bodies
 - Academia: “In addition to centering the voices of directly impacted communities and engaging community-focused stakeholders, advisory councils can include advocates, researchers, and academics who study the impact of technology on society, including marginalized communities, as well as the racial and ethical implications thereof” (Axon).
- Partner with LEOs
 - Academia: Memoranda of understanding (MOU) between universities and law enforcement agencies to develop technologies (Coles)

⁴ Likely the “National Policing Institute” is meant.

- Academia: Partner toward furthering transparency efforts (Measures for Justice)
 - Measures for Justice response names NYU Policing Project
- NGOs: Partner toward furthering transparency efforts (Measures for Justice)
 - Measures for Justice response named Center for Policing Equity, Measures for Justice, Vera Institute
- Train future investigators
 - Academia: (Measures for Justice)

The Gathering for Justice response was considered by STPI staff to be questioning the premise of Question 8. Their response stated, “While The Gathering for Justice (a nonprofit organization) looks forward to partnering with government and law enforcement agencies to advance equitable and disaggregated data practices, respectfully, it is not the role of nonprofits, academics, philanthropic organizations and/or other professionals to make ‘investments to help’ law enforcement. We need to invest in our communities who are deeply harmed by law enforcement agencies. The government needs to provide stronger oversight, and if the government wants support from nonprofits, etc., adequate funding and technical assistance must be provided and available to nonprofits and partners to achieve this important, collaborative work.”

B. Data Collection Section

1. Question 9: Federal Government Opportunities around Disaggregated Data Collection

Question 9 of the RFI sought the following information: “*How might the Federal Government better understand and improve the technologies and data systems that law enforcement agencies use to collect disaggregated data?*”

Twenty-two responses were received that were germane to Question 9 (Table 10).

Table 10. Respondents to Question 9

| Respondent Type and Count | Respondents |
|---------------------------------|--|
| Individual responses (4) | Coles, Hamilton, Johnson, Lauritsen |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (5) | IACP, Iowa DPS, Minnesota BCA, North Carolina GCC, and Texas DPS |
| Stakeholder/NGOs responses (2) | Center for Policing Equity and IJIS Institute |
| Research entities responses (1) | Evident Change |

| Respondent Type and Count | Respondents |
|---------------------------|---|
| Industry responses (9) | Axon, Cyrun, Intersystems, LEFTA Systems, Mark43, SSBI Digital, Tyler Technologies, Valkyrie Intelligence, and Wormeli Consulting |

The most common points made in response to Question 9 were also made in response to other questions:

- Need to coordinate State-level and Federal-level data collections to set standards and reduce administrative burden caused by multiplicity of data collection requirements (Axon, Cyrun, Texas DPS).
- Include data analysts, vendors, and other users—and not just data collectors—in the governance of Federal law enforcement data systems (Axon, IACP, IJIS Institute, Wormeli Consulting).
- Invest in new technologies for collecting and sharing disaggregated data (Axon, Hamilton, Johnson, Texas DPS).

Other responses provided in response to Question 9 made varied suggestions regarding efforts the Federal Government could undertake:

- There are many different types of LEOs so information system templates should not be one size fits all—the Federal Government should specify what information needs to be collected but allow for local customization (Coles).
- Changing data collection requirements can take years to implement due to budget constraints, leading to agencies’ utilizing less robust systems that fit those constraints (Iowa DPS).
- Work more closely with States and RMS providers to create interoperable systems (North Carolina GCC).
- Work with States to help them collect centralized State-level data (North Carolina GCC).
- Provide advanced notice to STLT agencies and RMS vendors before data collection requirements change (Minnesota BCA).
- Embed Federal personnel in STLT LEOs to understand how data are collected in the field (Center for Policing Equity).
- Participate in existing industry and professional society forums to better understand challenges associated with disaggregated data collection (FBI CJIS).
- Offer training on existing data collections (e.g., NIBRS) to RMS vendors (Minnesota BCA).

- Identify existing RMS tools that meet Federal data collection requirements (Tyler Technologies).
- Fund researchers to develop new (or enhance existing) criminal justice ontologies (Valkyrie Intelligence).
- Develop formal standards for data sharing, similar to efforts occurring around health data (Intersystems).
- Create “a toolkit to support agencies in the development or augmentation of useable data systems with a robust planning process and implementation support” (Evident Change).
- Create a working group under the auspices of BJS of criminologists, practitioners, and data holders to document formally the issues considered in this RFI (Lauritsen).
- Research best practices around for collecting, connecting, and protecting disaggregated criminal justice data (Johnson).
- Implement policies that incentivize law enforcement agencies to prioritize collecting detailed data for effective disaggregation (Johnson).
- Hold a regular, “law enforcement technology summit where software providers could present to Federal Government stakeholders how their systems support the collection, analysis, and distribution of data. Technology changes frequently, and with the advent of ChatGPT and similar AI and machine learning advancements, the government will benefit from hearing how these technologies are being used (and not mis-used) by the companies that provide services to law enforcement” (Axon).

“Criminal Justice as a professional discipline has a terrific opportunity to establish formalized data standards facilitating data aggregation standards around a common taxonomy similar to FHIR HL-7 in healthcare. This standardization would support data sharing and data research across many use cases both nationally and locally. In the U.S., healthcare data exchange has been conducted on a regional or state basis through the implementation of Health Information Exchanges (HIEs). These organizations ease data share across peer groups for various patient data use cases. HIEs can work in a hub mode where data is brought together centrally or left at the edge.”

– Intersystems

The LEFTA Systems response questioned the premise of Question 9, stating, “We do not believe the Federal Government needs to improve existing technologies; they already exist. It would actually be counterproductive for the Federal Government to build another system to collect data.”

2. Question 10: Standards for Reducing Barriers to Data Collection

Question 10 of the RFI sought the following information: *“What standards must be implemented to reduce barriers to data collection from law enforcement? What organizations or models of data standards exist that could serve as a model to inform more standardized police and criminal justice data collection in the future?”*

Twenty-five responses were received that were germane to Question 10 (Table 11).

Table 11. Respondents to Question 10

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Individual responses (3) | Coles, Hamilton, Mitchell |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (4) | Iowa DPS, North Carolina GCC, Prince William County PD, Texas DPS |
| Stakeholder/NGOs responses (7) | Campaign Zero, Center for Policing Equity, CEO Action for Racial Equality, Civic Hacker, IJIS Institute, Measures for Justice, SEARCH |
| Industry responses (10) | Axon, Cyrus, Esri, In-Synch Systems, Intersystems, LEFTA systems, Mark43, SpotCrime, Valkyrie Intelligence, Wormeli Consulting |

Common across most responses was the idea that there should be a universal standard. On standards, various points were made:

- Software application should be able to use the terminology that an agency uses and convert it to language that the Federal Government wants like “Taser” being called “ECD” or “EWD” (LEFTA Systems).
- Discussions on creating standards should be held at three levels: foundational, functional, and implementation standards; recommended that the existing Global Standards Package be used (IJIS Institute).
- Because data are often scattered, a “national standard for flattened data as well as the process for how to do it would ensure that agencies would have what the need when it comes to visualizing, analyzing, and sharing data to not only to the Federal Government but with communities as well” (Mitchell).
- “Standards should seek to provide more opportunity to scale data collection rather than lose nuance and context, and should range from standards for data definitions (use of force, arrest, citation, person-first language, etc.), data governance and privacy, and commitment that institutions with access and resources will make the information available to impacted communities and the broader public through responsible means. Further, it should be recommended

that every law enforcement agency must report a standard set of meaningful and accessible metrics. In the not-for-profit space, [Measures for Justice] (MFJ) is working toward this goal, incorporating voices at the national and local levels, from members of the public to scholars, to officers and police leadership” (Measures for Justice).

- “If agencies can implement automated data collection it could reduce the barrier and burden of documentation on law enforcement, while at the same time implementing a standard for all records. The [Institute of Electrical and Electronics Engineers] (IEEE) organization could inform and help develop more standardized police and criminal justice data collection. They could develop a standard ontology, taxonomy, topology, and data schema for easier comparison across agencies, while also letting it be extensible for unforeseen concepts and data possibilities” (Valkyrie Intelligence).

Some responses argued for centralization efforts by the Federal Government, such as compelling law enforcement agencies to report data or creating national standards:

- The Federal Government should require law enforcement agencies to report data by restricting Federal funding for failure to report data—with the exception of smaller agencies—or not allowing members of agencies who fail to report data to serve as technical assistance staff or to advise Federal or federally funded programs (Campaign Zero).
- “STLT agencies need better federal guidance on when and what types of Criminal Justice Information (CJI) fall under FBI CJIS for the purposes of data sharing with external stakeholders and the public. Many agencies feel constrained by their understanding of how CJIS regulations apply to their authoritative data. Lack of clarity on what CJIS applies to (address of an incident is a great example) prevents agencies from feeling free to share, often offers an excuse when sharing is not desired, or causes them to apply a blanket policy that treats all law enforcement data as falling under CJIS. Better federal guidance that offers clarity on what types of fields are okay for sharing would go a long way towards removing excuses associated with the lack of sharing of transparent, comprehensive, high-quality, and disaggregated data on law enforcement activities” (Esri).
- The States and the Federal Government require different data; data requirements also differ across the states. The Federal Government should try to normalize these programs, ideally with a single RMS system with oversight from a Federal state partnership (North Carolina GCC and Prince William County PD).

NIEM was referenced as a national standard in multiple responses (Wormeli Consulting, SEARCH, IJIS Institute, FBI CJIS, and Esri), as was NIBRS (Prince William

County PD, SEARCH, Esri, Mark43). Esri's response noted that NIBRS has "no incident-level requirement to capture specific location information, such as address of incident and its associated latitude and longitude." SpotCrime noted that FBI UCR/NIBRS data does not show crime at the street level and takes months to be published.

Other models and references mentioned include:

- California's mandated reporting and uniform standards (Campaign Zero)
- California's RIPA (Center for Policing Equity)
- Connecticut's model (Center for Policing Equity)
- IACP's recommended practices on data collection (Prince William County PD)
- Stanford's Open Policing Project (Prince William County PD, Measures for Justice)
- Criminal History Information Exchange Format (CHIEF) (SEARCH)
- Vera Police Data Transparency Index (SpotCrime)
- SpotCrime Crime Data Transparency ranking (SpotCrime)
- SpotCrime Open Crime Standard (which saw little success) (SpotCrime)
- Arnold Venture's "Because the Road to Reform is Paved by Data – Campaign for Criminal Justice Data Modernization (SpotCrime)
- Data Foundation's "Understanding Policing in America: How Neighborhood and Individual Characteristics Influence Experiences with Police and Perspectives of Policing" (SpotCrime)

FBI CJIS provided the following lessons learned from the N-DEX model efforts using the NIEM:

- "A data model that provides agreed-upon terms, definitions, and formats for various business concepts, agreed upon rules for how those concepts fit together, and independence from how information is stored in individual agency systems. It is a structured approach for development tools, processes, and methodologies.
- Improves public safety and homeland security by enabling timely, accurate, and secure information access and exchange between agencies and jurisdictions at all levels of government.
- Enhances the quality of justice and decision-making by providing accurate, timely, complete, and relevant information to decision-makers across the broad spectrum of NIEM participating agencies.
- Achieves greater efficiency, effectiveness, and return on investment in operations and decision-making by providing users with a set of reusable data

components, as well as the tools needed for discovering and developing common and universal data for effective information exchange.

- Improves efficiency and effectiveness through the application of standard methodologies for scenario-based planning, information exchange mapping and modeling, and standards development, reducing the design and development time needed to build and implement robust, agile information sharing capabilities.
- Facilitates business transformation by identifying and documenting information exchange requirements among and between diverse communities of interest, building information sharing standards, and enabling reengineering of key operations where appropriate.”

Other comments provided include the following:

- Standardization of XML and IEPDs is essential (North Carolina GCC).
- Information being collected in Anchorage will be different than information collected in Las Vegas so standardization should mimic other standards to make data collection faster and more effective like information on licenses or the Census (Coles).
- Government should support NIBRS training on the vendor’s software and not generic training (Cyrus).
- Common definitions for race and ethnicity may do a disservice to local or State interests (Hamilton).
- Use of “other” creates an inability to learn much because it melds together unlike characteristics and background while also possible masking disparity (Hamilton).
- Quality standards on all images received via electronic and manual submissions (Texas DPS).
- Need to protect PII of officer and citizen (Axon).
- Technology companies should be required to have a standard for policing data to make products cheaper for police departments (Axon).
- NIBRS should include a new variable to capture use of force, originating from the National Institute of Justice’s Use-of-Force Continuum nomenclature, with additional variables to reflect lethality and type of officer-involvement (Civic Hacker).

3. Question 11: Models and Lessons Learned

Question 11 of the RFI sought the following information: “*What are valuable models and lessons learned from data collected by organizations, groups, and researchers other than law enforcement agencies that are related to law enforcement activities? How might these practices lead to the valuable data collection that law enforcement agencies are unable or unwilling to collect on their own?*”

Fourteen responses were received that were germane to Question 11 (Table 12).

Table 12. Respondents to Question 11

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Individual responses (1) | Coles |
| Academic network responses (1) | Cline Center at University of Illinois |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (3) | Iowa DPS, North Carolina GCC, and Texas DPS |
| Stakeholder/NGOs responses (4) | Campaign Zero, Mapping Police Violence, Measures for Justice, NAACP LD, NACDL |
| Industry responses (4) | Axon, Mark43, Valkyrie Intelligence, Wormeli Consulting |

The responses provided numerous models, examples of data collection efforts, and organizations identified as undertaking notable data collection efforts. These include:

- Pew Charitable Trust (Coles)
- Washington Post police shootings database (Coles)
- Mapping Police Violence’s databases (Coles, Mapping Police Violence)
- Vera Institute police budget map (Coles)
- Statista police death by race (Coles)
- Marshall Project (Coles)
- San Antonio Police Department and Los Angeles Police Department report on all officer-involved shootings and critical incidents (Campaign Zero)
- Campaign Zero’s Mapping Police Violence (Campaign Zero)
- Washington Post’s Fatal Force database (Campaign Zero)
- Invisible Institute’s Citizen Police Data Project (Campaign Zero)
- ZenCity (Measures for Justice)
- Rochester Police Accountability Board (Measures for Justice)

- California’s POST (Measures for Justice)
- National Police Data Coalition (Measures for Justice)
- Police Data Accessibility Project (Measures for Justice)
- MFJ’s Summary Roundtable Report (Measures for Justice)
- American Society for Evidence Based Policing (IACP)
- Global Medical Response (Valkyrie Intelligence)
- N-DEx Program Office (FBI CJIS)
- Systematic Policing Oversight Through Lethal-force Incident Tracking Environment (SPOTLITE)

Axon’s response mentioned RTI International’s study that analyzed how seven agencies were unaware of what types of calls each of their call nature types represented.

Campaign Zero’s response included critiques of existing Federal databases including of the National Use-of-Force Data Collection, where participation is voluntary and granular-level agency data is not released, and of the CDC’s National Vital Statistics System, which a study found undercounted lethal officer-involved shootings by 55%.

NAACP LDF’s response recommended looking at the effects of incarceration on public health including its relationship with increased psychological distress, depression, anxiety, PTSD, suicide, infectious diseases, hypertension, diabetes, stroke, and exposure to violence. They added that results from the Department of Health and Human Service’s nationwide study of the effects of law enforcement on communities of color required under Executive Order 14074 should be “institutionalized at the federal level, conducted periodically, and similar information should be collected, evaluated, and published by local and state public health agencies to spur local and state public health policy solutions to police violence.”

NACDL provided a lengthy response on the need for external auditing of police-derived data to ensure their accuracy. As stated by the NACDL, “Neither the government nor law enforcement agencies should have an exclusive monopoly on creating or collecting misconduct data, and official databases should not be viewed as containing the universe of police misconduct information worth capturing to inform policy change. Police data collection and dissemination is most effective when it is connected and accountable to larger organizing efforts and movements, is strategically focused on preventing and reducing police violence, and is led, informed by, and deeply connected and accountable to communities directly impacted by policing.” They added that partnerships with communities, journalists, lawyers, and grassroots organizations can track data that the government of law enforcement is not tracking.

Several responses provided lessons learned, although they varied greatly in their scope:

- “We do not have enough research or lessons learned about how law enforcement systems can influence improving equity and transparency. Some of the work by the monitors in consent decrees may shed light on these issues, but there needs to be a lot more research focused on learning the best practices that make this case. At this point, we don’t have evidence to formulate best practices” (Wormeli Consulting).
- “Another lesson learned from a former client was to identify data sources to ensure certain individuals are not excluded. The purpose of our engagement was to develop a bus route for the community using cell phone location data. After our initial model was built and we began testing, we realized there was a gap between our predictions and the need. It was then realized by the client that they were only collecting data from iPhones, and neglected the needs of users with other types of phones” (Valkyrie Intelligence).
- Automation of reporting mechanisms is key to support administrative workload; training for officers and supervisors who enter data is essential; combined automated and human auditing is necessary; data will have to be analyzed in the context of the agency’s definitions and policies (Axon).
- FBI CJIS recounted lessons learned by the N-DEx Program Office when providing a national information sharing system that was developed with stakeholder buy-in and participation:
 - Aligning system capabilities with users’ tactical, investigative, operational, and strategic needs.
 - Navigating local, state, and tribal political considerations.
 - Providing ongoing system support post-deployment.
 - Minimize customization for individual customers/users.
 - Allow more time to implement system improvements, taking into consideration current system performance and scalability needs.
 - Develop and define policies early in system development—security, audit, legal, outreach, and training.
 - Implement standardization earlier in the data ingestion process.
 - Continually work to enhance data quality to improve return on investment.
 - Mitigate dependencies on customers to participate in information sharing.

- Obtain stakeholder buy in and participation earlier in the implementation process.
- Create a Concept of Operations document prior to Prototype and Rapid Development phases.
- Work collaboratively between technical staff and business staff; consideration of decisions must be equally weighted.
- Schedule adequate testing time prior to operational implementation.
- Consider all possible use cases for the user base.
- Limit access methods to the system and simplify the method of connection.
- Conduct cost benefit analysis on enhancements and features as they are suggested for the system (e.g., does this increase the value of the system/program?).
- Define the development and build cycles early on and consider how these impact marketing and outreach activities.
- Be consistent with messaging and communication with external and internal communities.
- Re-use technology and industry commercial off-the-shelf products when possible.
- Stay away from cliché relationships, phrasing, and comparisons, e.g., “google-like interface.” (FBI CJIS)

Other provided comments were varied:

- “It’s somewhat inaccurate to say that law enforcement agencies are unable or unwilling to collect data. In recent years law enforcement has shown to be very open to collecting new data. The issue comes with the technological and time challenges. Basically, collecting statistically accurate and viable data is not in the core mission of law enforcement. Collecting data becomes a burden when it is shoehorned into law enforcements daily workflow. We need to somehow learn to incorporate accurate and robust data collection into the common workday of law enforcement. We also need to make an effort to show law enforcement the value of these data and that the data is not being collected as a ‘gotcha’” (North Carolina GCC).
- “Develop a framework for categorizing, collecting, and reporting this data at the state-level” (Campaign Zero).
- “Combined IEPD formats like NDEx 4.0 (NDEx and NIBRS data) do not work for single submission for multiple purposes, as the business rules vary too much

between the different purposes this data is collected for. However, NIEM standardization across the various IEPD formats, helps vendors and agencies be more uniform in sharing data” (Texas DPS).

C. Use of Data Section

1. Question 12: Data Policies to Improve How Police Officers Interact with Underserved Populations

Question 12 of the RFI sought the following information: *“What are effective examples, and what lessons have been learned from how law enforcement agencies use data policies, tools, and practices to improve how police officers interact with underserved populations?”*

Seven received responses were received to Question 12 (Table 13), although one response, from Wormeli Consulting, was, “I don’t know any.”

Table 13. Respondents to Question 12

| Respondent Type and Count | Respondents |
|---------------------------------|---------------------------------------|
| STLT LEO responses (1) | North Carolina GCC |
| Stakeholder/NGOs responses (2) | Center for Policing Equity and NAMI |
| Research entities responses (1) | RTI International |
| Industry responses (3) | Axon, Mark43, and Wormeli Consulting* |

* Note: The Wormeli Consulting response was considered not germane and was not included in the analysis.

The six germane responses offered distinct examples of success stories of law enforcement effectively using data policies and tools:

- The Criminal Justice Analysis Center found that Black drivers were more likely to be stopped, especially for vehicle equipment violations—which gave leadership the opportunity to review their policies and procedures (North Carolina GCC).
- Seattle’s Office of Police Accountability publishes “a report of complaints filed against law enforcement that included information on the types and number of complaints filed, self-reported demographics of individuals filing complaints (including years of service), how many complaints officers are receiving and officer demographics, and outcomes following complaints” (Center for Policing Equity).

- Tucson, AZ’s police department established an Analysis Division in 2019 to employ advanced analytics across all policing systems. They employed internal dashboards to understand trends and found that an officer was identified as using shows of force at a rate higher than their peers. The officer was assigned additional training to improve their use of de-escalation techniques (RTI International).
- Effective programs to address situations involving those with mental health needs include the Police Mental Health Collaboration Program, the Stepping Up Initiative, and the Memphis Model of Crisis Intervention Team. These initiatives “encourage or require that criminal justice entities, such as law enforcement, create formal collaborations with mental health, advocates and other key stakeholders in their communities. Not only does the collaboration help build trust across groups of stakeholders, but they also create opportunities to leverage resources in different networks and across the community” (NAMI).
- Mark43 helped the Albuquerque Police Department to build out their RMS as they start supplementing their police response with trained mediators, social workers, and mental health clinicians. The Atlanta Police Department also automated and releases real-time data dashboards (Mark43).
- Axon highlighted their product, My90, which automates surveys for police departments to collect confidential and systematic feedback from community members. The survey does not ask for officer names or badge numbers or for community members’ names, address, or immigration status. The survey also does not create formal complaints or commendations. Serious information, which does not include contact information, is treated as an anonymous tip.

NAMI also recommended that OSTP leverage grant programs at the Office of Justice Programs, the Substance Abuse and Mental Health Services Administration, National Institute of Mental Health and other agencies, to support ongoing collaboration through financial support and grant requirements.

2. Question 13: Data Policies Related to Sexual Assault, Domestic Violence, and Other Gender-Based Violence

Question 13 of the RFI sought the following information: “*What are examples of law enforcement agencies using data policies, tools, and practices that have and have not improved how police officers collect, maintain, review, and act upon data regarding sexual assault, domestic violence, and other forms of gender-based violence?*”

Three responses were received to Question 13 (Table 14), although the Wormeli Consulting response was, “Unknown.”

Table 14. Respondents to Question 13

| Respondent Type and Count | Respondents |
|---------------------------|---------------------------------|
| STLT LEO responses (1) | Iowa DPS |
| Industry responses (2) | SSB Digital, Wormeli Consulting |

* Note: The Wormeli Consulting response was considered not germane and was not included in the analysis.

The Iowa DPS response was, “The data collection supports various initiatives and training for officers. Specifically within our state, we collect Domestic Violence qualifiers. This has triggered agencies to learn about trauma, how to recognize domestic abuse and ways to interact that aligns with best practices and trauma-informed care. This has led to various initiatives that help educate law enforcement as well as the public as to law enforcement’s role. Data collected helps to drive the need for resources based on trends and gaps agencies may have.” SSB Digital reported that they have been “awarded a contract for integration of multiple types of law enforcement agencies to ensure the following of fair practices. The data is displayed to differentiate on various parameters such as sort of crime, gender of victim and suspect/accused, and more. This enables taking relevant steps in bettering these practices more informed and transparent.”

3. Question 14: Human Capital and Data Infrastructure Investments

Question 14 of the RFI sought the following information: “*What investments in human capital and data infrastructure can STLT law enforcement agencies make to disaggregate data and conduct equity assessments to inform policies, programs, and protocols to reduce disparities?*”

Fifteen responses were received that were germane to Question 14 (Table 15).

Table 15. Respondents to Question 14

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Individual responses (2) | Mitchell, Johnson |
| Academic network responses (1) | Williams Institute at UCLA |
| STLT LEO responses (3) | Iowa DPS, North Carolina GCC, and Prince William County PD |
| Stakeholder/NGOs responses (4) | Gathering for Justice, Giffords Center, Measures for Justice, SEARCH |
| Industry responses (5) | Axon, Mark43, Tyler Technologies, Valkyrie Intelligence, Wormeli Consulting |

Multiple responses agreed that investment in data infrastructure was necessary, with several responses offering various elements that should be included with any form of data infrastructure:

- A standard and automated data request system for researchers to quickly access deidentified incident-based reporting (Williams Institute).
- A centralized database across all city services like homeless shelters and hospitals to inform officers' judgments (Valkyrie Intelligence).
- A national and universal data platform that all law enforcement agencies are mandated to use, as it relates to incidents of excessive police violence, including homicides committed by police. This data platform must be shaped by a racial equity lens, with data reflecting incidences of violence disaggregated by race and ethnicity. Data would also be shared publicly (Gathering for Justice).
- Tyler Technologies' Public Safety Analytics Suite (Tyler Technologies).
- Infrastructure should have easy access to data such as through publicly accessible dashboards of firearm-related and other arrest data could help "facilitate research exploring the disparate enforcement of certain gun safety laws along lines of race and other demographic characteristics." These public data should be disaggregated by demographic characteristics. (Giffords Center).
- Optimization of management of unstructured content that can provide insights in social characteristics, geographic locations, and other relevant attributes associated with individuals involved in law enforcement interactions (Johnson).
- A spatiotemporal data platform to identify patterns across time and space (Johnson).
- Cloud-based solutions with Application Programming Interfaces (APIs) or online analytic dashboards, where money could be saved and put towards other resources (Mark43).
- Other responses provided general agreement with the importance of investments in data infrastructure including collection, storage, and analysis (Iowa DPS, Wormeli Consulting, Prince William County PD).

“Right now, states collect incident-based reporting data from law enforcement agencies in different ways, and each state agency or surrogate creates its own impediments to the timely and cost-effective access of that data. For example, some state agencies use a standard public records requests interface through which requests for incident-based data must be processed. Others appear to require direct contact through email or phone to a specific person in order to initiate a request. Records requests can take months to complete. Moreover, while some states do not charge a fee for incident-based data, others require payment in the hundreds or thousands of dollars.” – Williams Institute

Iowa DPS noted that “if the ability to input data into either the local system or state system is not easily accessible, then the likelihood of obtaining complete data decreases.”

Mitchell provided a longer answer, outlining what features software solutions should provide in order for law enforcement agencies to accurately analyze and benchmark their data. The software should be able to “flatten data . . . clean up missing and duplicate data issues using advanced inferential statistics to avoid manual cleaning . . . create a systematic way to account for repeat police contacts or users of the 911 and non-emergency systems . . . link CAD CFS [*calls for service*] to RMS reports to determine what CFS are becoming crime/incident reports and which ones are not . . . link CAD CFS—to RMS reports—to outcomes (arrests, involuntary mental health commitments, citations, tows, stops, and searches) . . . break down CFS to RMS to outcomes by demographics (Sex, race, age, geographic location, time, day, etc. of offender, victim, and officers) . . . and code relationships within the system to better understand offender/victim/officer relationships.”

Similar to elements to be included in data infrastructure, multiple responses agreed with the need for investments in human capital with various elements proposed:

- Hire well-trained data analysts with expertise (North Carolina GCC, Prince William County PD, Wormeli Consulting, SEARCH, Axon).
- Use co-op system to share data analysts across smaller agencies (North Carolina GCC).
- Hire ethicists, sociologists, psychologists etc. to diversify law enforcement policies and programs (Valkyrie Intelligence).
- Use professionalized information technology management to help build capacity (SEARCH).
- Hire law enforcement officers who are focused on leveraging and using technology to drive better outcomes and reduce disparities (Axon).

Responses suggested several structural and organizational changes including an annual funding pool to support organizations interfacing with communities through townhalls or brown bags (Gathering for Justice) and accountability measures such as an independent “watchdog” agency created by the government to ensure that data are being accurately and consistently tracked with the power to impose penalties (Gathering for Justice, Prince William County PD). Wormeli Consulting suggested that investments in data management systems and human capital could be undertaken by the crime analysis unit or the planning and research divisions to support policy formulations. Mitchell suggested the creation of a DARPA-like organization for the Federal Government to take on the risk of developing research, technology, and innovation for public safety.

Measures for Justice offered the following consideration: “Departments are asked to juggle competing priorities for budget and resources, but if committed to using data for

better decision making and evaluation, incremental changes may be a more tangible and palatable option. It is difficult to ask officers to take additional time for record-keeping, especially in small departments, but nonprofit and philanthropic resources may be able to offset the burden while demonstrating the value of the entire department’s investment in better data collection.”

4. Question 15: Roles of Philanthropic Organizations and Academic Researchers in Improving Data Collection and Use by Small STLT LEOs

Question 15 of the RFI sought the following information: *“How might philanthropic organizations and academic researchers work effectively with government officials to evaluate and improve data collection, use, and transparency practices for small and resource-constrained STLT law enforcement agencies?”*

Five responses were received that were germane to Question 15 (Table 16).

Table 16. Respondents to Question 15

| Respondent Type and Count | Respondents |
|---------------------------|---------------------------|
| Individual responses (2) | Hughes, Johnson |
| STLT LEO responses (1) | North Carolina GCC |
| Industry responses (2) | Cyrun, Wormeli Consulting |

The North Carolina GCC response mentioned that State leaders are “are unaware of the complexity and technical nature of collecting and analyzing data” and suggested that these leaders provide more resources—funding and staffing—to support law enforcement data programs. The Wormeli Consulting response also mentioned funding needs, and specified that, “NGOs could help by developing standards, supporting software providers to make default versions of software contain the necessary data elements, providing training programs for small and resource limited agencies, and promoting best practices for considering equity issues in operations.”

Similarly, Johnson suggested that NGOs can provide training on data collection best practices, technical expertise to optimize existing data systems, process design for involving external stakeholders, research on ways to empower communities through access to transparent data, and joint research projects to meet community needs to address systemic disparities. Johnson added that philanthropic organizations could provide funding to grassroots community-based organizations to support data collection, analysis, and visualization especially to empower marginalized communities. Johnson added the following comment related to academic research: “Academic researchers can also present a barrier to trusting and accessing the lived experiences of community members and families with multiple generations of knowledge. Research is rarely real-time, and often

these findings validate perspectives shared by communities for decades prior. Additionally, academic research often needs more modern tools and data analysis techniques, leading to outdated best practices that fail to consider the diverse range of information available today, such as spatiotemporal analysis, big data, and equitable uses of AI. To ensure actionable insights are developed, law enforcement agencies and philanthropic organizations must provide resources to equip academic researchers with the tools and necessary funding for more real-time and contemporary analysis of community members' lived experiences and expectations.”

Hamilton noted that partnering with independent researchers, such as those residing in universities, would provide a proper balance to analyses because “When these tasks are conducted internally within criminal justice agencies, there exists substantive potential for the invasion of conscious and unconscious biases and agendas of line staff and management This collaboration could also increase the goals of transparency and appearance of legitimacy in the reported results.”

D. Data Transparency Section

1. Question 16: Police-Community Partnerships for Data Sharing

Question 16 of the RFI sought the following information: “*What are exemplary models of police-community partnerships where police actively work with the community to share data findings and discuss how these data can address community needs? What lessons have been learned?*”

There were nine responses to Question 16 (Table 17), although the Wormeli Consulting response was, “Unknown.”

Table 17. Respondents to Question 16

| Respondent Type and Count | Respondents |
|--------------------------------|--|
| Individual responses (1) | Caplan |
| Academic network responses (1) | Yale Justice Collaboratory |
| STLT LEO responses (2) | Iowa DPS and Virginia State Police |
| Industry responses (5) | Axon, In-Synch Systems, Mark43, Tyler Technologies, Wormeli Consulting |

* Note: The Wormeli Consulting response was considered not germane and was not included in the analysis

The responses cited many forms of police-community partnerships that work to share data findings:

- Roundtables with law enforcement and the community, which are “available to the public and discussions surround what is currently taking place, benefits of the partnership and goals for the future” (Iowa DPS).
- National Night Out (Iowa DPS).
- Virginia’s Open Data Portal through their Office of Data Governance (Virginia State Police).
- Colorado Springs, CO PD reports demographic make-up of the police force demonstrating that it reflects the community (Tyler Technologies).
- Greenville, NC PD participated in preexisting programs like the 2016 Cops and Barbers Program and it shares annual reports and cumulative data (Tyler Technologies).
- Chattanooga, TN PD displays data on a publicly available website (Tyler Technologies).
- Seattle Police Department’s micro-community policing plan program, which consists of surveys and publicly displaying those results to inform conversations with the community (Yale Justice Collaboratory).
- Compstat360 by the National Policing Institute and Vera Institute of Justice, which seeks “to promote ‘co-production of public safety’ by police and community members through mutual sharing of data deemed to be relevant to the attainment of common public safety goals.” An example of its implementation is by Manchester, NH to reduce gun violence (Yale Justice Collaboratory).
- Commons dashboard developed by Measures for Justice, which collects data from prosecutors’ offices, police departments, and courts, and the results are shared publicly and compared against pre-determined policy goals (Yale Justice Collaboratory).

The Newark Public Safety Collaborative was cited by both Caplan and by Simsi Inc. as an example of an effective partnership. The Collaborative uses Risk Terrain Modeling to connect crime with geography. As summarized by Simsi, Inc:

For example, when top place-based risk factors for shootings were identified as convenience stores, laundromats, and vacant buildings, a risk narrative was formed with consensus among multiple stakeholders. The risk narrative is like a story about the contexts of shooting incidents and how they connect at or around these places. Everyone agreed that most shootings were about turf conflict and drug related. Convenience stores were believed to be locations where drug buyers are solicited because they’re open late, it’s easy to loiter, and easy to come and go. Laundromats are open 24-hours,

coin-operated, and don't have managers on site, so that's where buyers are told to go nearby to make the drug transactions off the street and out of sight. Buyers use the drugs at nearby vacant buildings after purchase, and dealers use vacant properties as stash houses for drugs and weapons. Data-informed risk narratives such as this empower several agencies to coordinate their efforts and share the burden of crime prevention. Police focused patrols at high-risk places and did business checks at laundromats and convenience stores located there. They also paid attention to nearby vacant properties at peak times. Meanwhile, the City Planning Department prioritized their boarding-up and demolition of vacant properties, and Public Works fixed street lights at these areas.

The NPSC [Newark Public Safety Collaborative] hosts bimonthly meetings with a large and diverse group of local stakeholders, which includes city officials and police, but mostly others such as business owners, non-profit organizations and community groups. They all get access to the same data and analytics, add context to it, then form strategies to disrupt the risk narratives at priority places based on their own unique missions, resources and expertise. Their independent initiatives combine to produce a deliberate and impactful response to crime problems throughout the city as a whole. The result is a comprehensive, dynamic, transparent and effective crime prevention strategy tailored to the local problem. Law enforcement is only one part of the effort.

Simsi, Inc. also included several lessons learned, suggesting that starting small with data can make it easier to not overwhelm stakeholders; using a framework like the Risk Terrain Modeling analyses can help the group speak the same language; a group should administratively manage the Collaborative; the Collaborative should start locally; and the Collaborative should measure and meet the needs and expectations of the community like focusing on certain crimes more prevalent in the area.

Several industry responses highlighted how their software solutions have helped law enforcement collect and share data with the community. Advantages that these solutions offered to the agencies include the following:

- When combined with statistics on public contact, which they pulled from their calls for service, law enforcement agencies were able to show “an accurate picture” that combatted some instances of public misperception (In-Synch Systems).
- Saved time writing reports (Mark43).
- Platform streamlines case management where troopers can submit reports that can be reviewed by their supervisors; information can also be shared with other agencies, organizations, and the public such as through reports and dashboards (Mark43).

- Provides confidential surveys for the public to share feedback about interactions with LEOs, which are “critical to building trust with low-trust members of the public who are disproportionately people of color” (Axon).
- Report out aggregate, de-identified results that protect personally identifiable information while increasing transparency and public information sharing (Axon).
- Identifying specific “opportunities to bank trust” by conducting ongoing, real-time surveys rather than (solely) relying on annual surveys that yield low levels of responses (Axon).

Axon provided the following additional comment: “While there are increasing ways in which to review encounters between the public and the police, such as body-worn camera footage, there remains a critical scarcity of information provided directly by members of the public. Without collecting feedback from members of the public, entire categories of information (such as demographic data) remain unreliable and incomplete. As public access to information increases, accuracy of the data is essential to successfully build public trust and identify potential inequalities and disparities that people experience.”

2. Question 17: LEO Data Sharing Regarding Reducing Disparities

Question 17 of the RFI sought the following information: “*To what extent do law enforcement agencies currently make data publicly available about their efforts to reduce disparities in policing outcomes? What are examples and opportunities for law enforcement agencies to use relevant and accessible approaches to data transparency?*”

Seventeen responses were received that were germane to Question 17 (Table 18).

Table 18. Respondents to Question 17

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| STLT LEO responses (4) | IACP, Iowa DPS, Prince William County PD, Texas DPS |
| Stakeholder/NGOs responses (3) | Campaign Zero, Measures for Justice, NACDL |
| Industry responses (9) | Axon, Cyrun, Esri, In-Synch Systems, Jensen Hughes, LEFTA Systems, Mark43, SmartForce Technologies Inc., Wormeli Consulting LLC |
| Industry Group responses (1) | CEO Action for Racial Equity |

Iowa DPS, SmartTech, NACDL, and Esri all mentioned that data release practices vary greatly between jurisdictions, causing heterogeneity in released data across the agencies. Iowa DPS noted that larger agencies likely have more people who can facilitate data releases. The most common form of data release is publicly accessible data dashboards

(SmartTech, LEFTA Systems, In-Synch Systems, Esri, Mark 43, Axon). As LEFTA Systems summarizes, “LEAs use dashboards on agency’s websites that share certain data points with their community (for example, use-of-force statistics and stop data, etc.). Without the proper software program this can be a very burdensome process. A data analyst has to collect the data, create visual representations for the data collected, and then find a way to get it on the agency’s website. This can require different software programs and requires access to multiple applications. Ideally the agency is using one platform that not only collects all of the required data but also displays this data in a way that can be shared with the community.” Esri also mentioned that some agencies provide open data portals to the public.

Various resources were provided in the responses as examples of good data sharing practices and platforms to reduce disparities. These include:

- Efforts by jurisdictions:
 - Seattle Police Department (Campaign Zero)
 - Los Angeles Police Department (Campaign Zero)
 - NYC Police Department (Campaign Zero)
 - California’s RIPA (Measures for Justice)
 - City of Houston Police Transparency Hub (Esri)
 - City of Columbus Division of Police (Esri)
 - Berkeley Police Transparency Hub (Esri)
 - Asheville Police Department (Esri)
 - Partnership between Rochester, NY and West Sacramento, CA with MFJ’s Policing project implement framework of police performance metrics (Measures for Justice)
 - Charleston Police Department’s Racial Justice Audit (Measures for Justice)
 - Washington State’s efforts to identify a research institution for the collection and management of use-of-force data (Measures for Justice)
 - Florida’s Criminal Justice Data Transparency Bill (Measures for Justice)
 - California’s Justice Data Accountability and Transparency Act (Measures for Justice)
 - Oregon Department of Public Safety Standards & Training Professional Standards Cases Database (CEO Action for Racial Equity)
 - Policing efforts in England and Wales (<https://data.police.uk/>) (Hamilton)

- Criminal History Conviction Name Search (Texas DPS)
- Texas criminal illegal alien statistics (Texas DPS)
- Texas’s TxGC 411.135, which allows the public access to Texas convictions and deferred adjudication criminal history record information (Texas DPS)
- Prince William County PD’s annual report on crime and publicly available arrest logs and daily incident reports (Prince William County PD)
- Prince William County PD’s Community Engagement that “works hand-in-hand to partner with watch groups in neighborhoods, the business community, and religious institutions to discuss crime deterrence and ways to involve the greater community in crime prevention efforts” (Prince William County PD)
- Efforts by NGOs and academia
 - Center for Policing Equity’s Justice Navigator (Measures for Justice)
 - NYU Policing Project’s Neighborhood Policing Initiative (Measures for Justice)
 - Stanford Open Data Project (Measures for Justice)
 - Policing Data Initiative model, used by local law enforcement agencies (Measures for Justice)
 - Open Data (IACP)
 - Clery Act requirements for college campuses (Cyrun)
 - National Decertification Index (CEO Action for Racial Equity)
 - USC Police Misconduct Registry (CEO Action for Racial Equity)
 - Chicago Citizen Police Data Project (CEO Action for Racial Equity)
 - National Institute of Policing [sic]⁵ (Wormeli Consulting)

Several responses included ways for law enforcement agencies to improve data transparency:

- Engage with communities to foster trust, collaboration, and improve policing outcomes (SmartTech, Esri).
- Develop tools for agencies to engage the community and solicit feedback on their policing efforts (Esri).

⁵ Likely the “National Policing Institute” is meant.

- Provide regular reports to stakeholders to demonstrate agencies’ commitment to transparency and accountability (SmartTech).
- Participate in national data initiatives (SmartTech).
- Identify and track bias profiling practices by LEAs’ members (LEFTA Systems).
- Need for oversight and enforcement mechanisms to ensure law enforcement agencies are complying with transparency laws (NACDL).

Hughes argued, “We have also seen that while many agencies are reticent to provide information to the public out of concerns that because anyone can take published data and recontextualize it in a way that may be seen as excessively critical by a law enforcement agency, especially when the data is analyzed by others without any context of a community’s social challenges, those agencies who provide important data on a regular and consistent basis will, over time, be recognized as being open and transparent as they work to address any issues of concern they may have regarding the data. Again, over time, this engenders greater public trust in the law enforcement agencies that provide such data.”

On the other hand, several responses had differing responses. For example, Wormeli Consulting, referencing efforts to reduce disparities, said “very little has been done on this issue . . . will to do so is not common.” NACDL cited three studies showing that the New York, Chicago, and Los Angeles Police Departments have been reported to have deleted data in response to legislation or internal policies meant to increase transparency.

IACP submitted the following comment: “If an agency were to talk about their efforts to reduce disparities in policing outcomes, they would likely take a beating in the popular press. You don’t get credit for trying to improve in cases where you have to expose that you may not have been perfect in the first round.”

3. Question 18: Data Sharing and Small STLT LEOs

Question 18 of the RFI sought the following information: “*How might small and resource-constrained jurisdictions participate in public data sharing and use it to inform decision-making and increase accountability?*”

Sixteen responses were received that were germane to Question 18 (Table 19).

Table 19. Respondents to Question 18

| Respondent Type and Count | Respondents |
|--------------------------------|------------------------------------|
| Individual responses (1) | Johnson |
| Academic network responses (1) | Yale Justice Collaboratory |
| STLT LEO responses (3) | IACP, Iowa DPS, North Carolina GCC |

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Stakeholder/NGOs responses (2) | IJIS Institute and Center for Policing Equity |
| Industry responses (9) | Cyrun, Esri, In-Synch Systems, Intersystems, LEFTA Systems, Mark43, Simsi Inc., Valkyrie Intelligence, Wormeli Consulting |

Three organizations, North Carolina GCC, IJIS Institute, and Esri, provided similar comments on using a cooperative system where smaller agencies can share resources related to data analysis including analysts and RMSs. As IJIS Institute suggested, “small agencies will certainly benefit from collaborating with local agencies and partners by developing joint data sharing capabilities using a shared services model. This will help reduce the resource burden on any one agency and distribute the financial burden across partnering agencies and move towards more effective data sharing. Utilizing cloud-based solutions and standards like NIEM or other standards can reduce the overall cost and additional resource needs.”

There were recommendations that small and resource-constrained jurisdictions take advantage of low-cost, readily available, and simple resources to collect and share data. This could include federally provided basic RMSs (North Carolina GCC), simple websites that display basic statistics like crime rates (Wormeli Consulting), and low-cost training (Esri). Use of software that puts much of the burden of data entry, data exportation, and analysis on the software developers rather than staff or includes more automated features may also help smaller agencies (LEFTA Systems, IACP, and Esri).

Several responses suggested that States and the Federal Government provide resources to smaller agencies such as through grants. This could include grants that come with reporting requirements or grants derived from partnerships between States and foundations. Smaller agencies could also look to larger government agencies that may already have resources available, such as shared RMS licenses (Wormeli Consulting, Johnson, Yale Justice Collaboratory, Esri).

Iowa DPS suggested that smaller agencies participate in the UCR program, where data could be readily pulled. Wormeli Consulting and Johnson suggested that States provide either data portals for local agencies to present basic data or central data repositories to standardize and make available public safety data.

Other suggestions included:

- Any potential IEEE standard data schema should be included on all Internet of Things devices, which would make it easier for smaller agencies to collect, normalize, and share their data (Valkyrie Intelligence), and
- Smaller agencies should conduct internal inventory auditing to determine if they already have internal data management resources (Esri).

4. Question 19: Access for Historically Underrepresented Scholars and Research Institutions to LEO Data

Question 19 of the RFI sought the following information: “*What relationship-building and what resources would be effective for expanding opportunities for historically underrepresented scholars and research institutions to access law enforcement data while protecting privacy?*”

Seven responses were received that were germane to Question 19 (Table 20).

Table 20. Respondents to Question 19

| Respondent Type and Count | Respondents |
|---------------------------|---|
| Individual responses (1) | Johnson |
| STLT LEO responses (3) | IACP, North Carolina GCC, Texas DPS |
| Industry responses (3) | Cyrun, Intersystems, Wormeli Consulting |

The recommendations were highly varied, which included:

- Establish statewide data clearing houses that can maintain and remove any personally identifiable information with datasets normalized to a national standard to facilitate fair and accurate cross-analyses (North Carolina GCC).
- To “promote a more inclusive collection of justice researchers,” BJS should reach out to institutions with underrepresented scholars to make them aware of data repositories, to provide tools for analysis, and to educate researchers on how to use the data (Wormeli Consulting).
- In response to researcher requests, IACP could reach out to agencies on their behalf in order to solicit participation in studies (IACP).
- Create symposia for vendors to be put in direct touch with researchers on a one-to-one basis so that vendors can be more willing to share sensitive information, which is not possible with existing tradeshow (Cyrun).
- Create a vocabulary framework to share data for research purposes, as has been done by healthcare organizations using the Observational Medical Outcomes Partnership Common Data Model (Intersystems).
- Build relationships with Black-focused racial equity and STEM organizations such as NAACP, Urban League, UnidosUS, Black in GeoScience, NorthStar of GIS, and the National Society of Black Engineers, which have trusted relationships with the community and can serve as key partners (Johnson).

- Provide resources such as scholarships for students interested in technology courses, courses in ethical use of data, and training opportunities to teach advocates basic data science (Johnson).
- Post online clear criteria and processes for researchers to request criminal history data (Texas DPS).
 - “The state of Texas has TxGC 411.083(a)(4) for the access to confidential criminal history record information if they are a person working on a research or statistical project that is funded wholly or partially with state funds or meets the requirements of Part 22, Title 28, CFR, and is approved by the department. If a person does not meet the requirements of TxGC 411.083(a)(4), Tx DPS also has the conviction database that may be purchased. The database will provide all Texas convictions and deferred adjudications per TxGC 411.135” (Texas DPS).

5. Question 20: Barriers and Opportunities for Improving Agency Participation in NIBRS

Question 20 of the RFI sought the following information: “*The E.O. intends to maximize STLT participation in the National Incident-Based Report System (NIBRS). What are the barriers and opportunities for improving agency participation in NIBRS, including its hate crime reporting section and the FBI’s National Use-Of-Force Data Collection?*”

Seventeen responses were received that were germane to Question 20 (Table 21).

Table 21. Respondents to Question 20

| Respondent Type and Count | Respondents |
|---------------------------------|--|
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (6) | IACP, Iowa DPS, Minnesota BCA, North Carolina GCC, Prince William County PD, Texas DPS |
| Stakeholder/NGOs responses (3) | IJIS Institute, Safe States Alliance, and SEARCH |
| Research entities responses (1) | RTI International |
| Industry responses (6) | Axon, Cyrun, In-Synch Systems, LEFTA Systems, Mark43, Wormeli Consulting |

Most of the responses provided to this question related more generally to concerns regarding data collection and RMS management. The respondents most commonly cited that lack of resources—in terms of time, bandwidth, funding, and experience—was a major barrier to participating in NIBRS. Multiple factors were noted as exacerbating this problem including:

- Disparate data entry and collection systems and requirements, such those for NIBRS and those for use-of-force data, make the process unwieldy and require more bandwidth to enter in data (Safe States Alliance, North Carolina GCC, FBI CJIS, and Texas DPS).
- Having to meet new State and Federal requirements, each of which may require its own customized data collection system can make it feel like they are trying to hit a moving target (North Carolina GCC).

The Wormeli Consulting response further noted, “An obstacle to the inclusion of use-of-force reporting in NIBRS is a product of FBI Advisory Policy Board reluctance to take this obvious route. It will take a policy change through the APB or congressional action to make this happen, and it must be done if we will ever achieve the objectives of knowing the extent of use of excessive force.”

To address these resource shortages, Wormeli Consulting and FBI CJIS said that financial support to law enforcement agencies has been effective in helping them transition to NIBRS while RTI International, IACP, and In-Synch Systems argued for additional support, funding, and training at the local level. LEFTA Systems said that funding should be provided specifically for software, otherwise that funding will be used on other resources instead like body cameras or equipment.

Responses noted a general lack of buy-in by law enforcement agencies into reporting NIBRS and that some form of incentive, financial or otherwise, to encourage participation is needed (Wormeli Consulting, RTI International, Safe States Alliance). Iowa DPS noted that they typically do not know what the data will be used for, which is a barrier to buy in; similarly, FBI CJIS said that agencies have expressed concerns that the public may perceive an increase in crime if they switched to NIBRS. In response, they noted that a 2019 study showed only a 2.4% increase in crime reported via NIBRS. RTI International pointed to BJS’s LEARCAT and FBI’s Crime Data Explorer as examples of efforts trying to increase buy-in and participation. Iowa DPS suggested that agencies would increase participation if they are shown that they can provide insight on what they are doing properly and to correct misconceptions.

Several opportunities were suggested by the responses. These include:

- BJS and FBI could share oversight of NIBRS data, split between statistical and investigative data, just as how FBI has jurisdiction over CODIS, IAFIS, LEOKA, and UCR data (Safe States Alliance).
- Federal Government could hire crime analysts who provide NIBRS data analysis to help local law enforcement agencies make decisions (Safe Space Alliance).
- Collaborations with stakeholder organizations can strengthen the public’s understanding of NIBRS (Safe States Alliance).

- Federal Government should work with RMS vendors to develop and offer intuitive, easy-to-use record management systems (Prince William County PD).

Successful models of funding noted by the responses include Minnesota’s model for funding, technical specifications, and deployment support (Minnesota BCA) and the COVID-19 Hate Crime Prevention Act, which authorized grants to implement NIBRS and to provide training on responding to hate crimes (FBI CJIS). Minnesota BCA also noted that crime data and use-of-force data reporting are statutorily required in the State.

6. Question 21: Federal Data Sharing to Empower STLT Officials, Researchers, and Civil Society

Question 21 of the RFI sought the following information: *“How might the Federal Government better share the criminal justice data it collects through surveys and programs like these in a manner that assists and empowers STLT government officials, researchers, and civil society to make use of such data to understand trends and inform policy decisions?”*

Seventeen responses were received to Question 21 (Table 22), although the response from the North Carolina GCC was considered not germane and was not included in the analysis.

Table 22. Respondents to Question 21

| Respondent Type and Count | Respondents |
|--------------------------------|---|
| Individual responses (1) | Johnson |
| Federal LEO responses (1) | FBI CJIS |
| STLT LEO responses (4) | Iowa DPS, IACP, North Carolina GCC,* and Texas DPS |
| Stakeholder/NGOs responses (8) | Campaign Zero, Center for Policing Equity, Council on Criminal Justice, IJIS Institute, Measures for Justice, NACDL, NAMI, Safe States Alliance |
| Industry responses (3) | Cyrun, Valkyrie Intelligence, Wormeli Consulting |

* Note: The North Carolina GCC response was considered not germane and was not included in the analysis.

The most common recommendation focused on making data accessible to stakeholders. This includes making criminal justice data more accessible to the public and to qualified researchers especially through clean visual dashboards and easily understandable reports (Valkyrie Intelligence, Safe States Alliance, NAMI, Johnson, NACDL). For example, NAMI noted that releasing easily understandable reports for the public would make it easier for grassroots advocates to support effective policy change.

Respondents also provided several technical recommendations to improve accessibility, including the following:

- Centralize all Federal criminal justice data into one API (Campaign Zero).
- Provide access to firearm data that comes with clear documentation on the data (Safe States Alliance).
- Make clear who has responsibility for data management (Measures for Justice).
- Include a query function in datasets (Measures for Justice, Cyrun).

NACDL and Council on Criminal Justice suggested partnering with STLT governments, researchers, and organizations to facilitate collaboration on criminal justice data collection efforts. NACDL pointed specifically to the Community Law Enforcement Accountability Network as an example in California. Johnson suggested convening groups with representatives from community-based organizations to develop sets of questions, metrics, and data visualizations.

Measures for Justice, IACP, and Valkyrie Intelligence noted the need to put data in the proper context. This would allow for local leaders to be able to make decisions locally and within the context of their community.

Iowa DPS, IJIS Institute, and NAMI suggested that the Federal Government communicate and educate the public on its efforts. This includes continued communication through emails, newsletters, and training on programs such as the Crime Data Explorer; educating the public on the greater national strategy; and releasing easily understandable and accessible tool kits and reports that can help advocates inform policy makers.

Campaign Zero mentioned specific datasets the Federal Government should continue improving and supporting and making data publicly available—including the National Crime Victimization Survey, the Law Enforcement Management & Administrative survey, and CDC H-CUP.

Other responses that were less germane to the question included recommending that the Federal Government provide additional resources, training, and tools for STLT law enforcement agencies and that the Federal Government issue standard data reporting requirements.

3. Summary of Topic-Specific Responses

Twenty-four of the 86 responses were summarized individually rather than question-by-question because they focused on a single idea or topic:

1. Cheryl Phillips individual response
2. Fons von Gessel individual response
3. James Nolan individual response
4. Jerry Garner individual response
5. Jerry Ratcliffe individual response
6. Joel Garner individual response
7. M. Chris Cox individual response
8. Mark Beaudry individual response
9. Michael Melton individual response
10. Philip Matthew Stinson individual response
11. The Policy Lab at Brown University academic network response
12. Data Foundation organizational response
13. Electronic Privacy Information Center organizational response
14. ForceMetrics organizational response
15. Full Circle Training Solutions organizational response
16. Latinas in Law Enforcement organizational response
17. Major County Sheriffs of America organizational response
18. National Policing Institute organizational response
19. Project on Government Oversight organizational response
20. Strategies for Youth organizational response
21. Tech5 USA organizational response
22. The Sikh Coalition organizational response
23. Treatment Advocacy Center organizational response

24. Vera Institute organizational response

A. Cheryl Phillips Individual Response

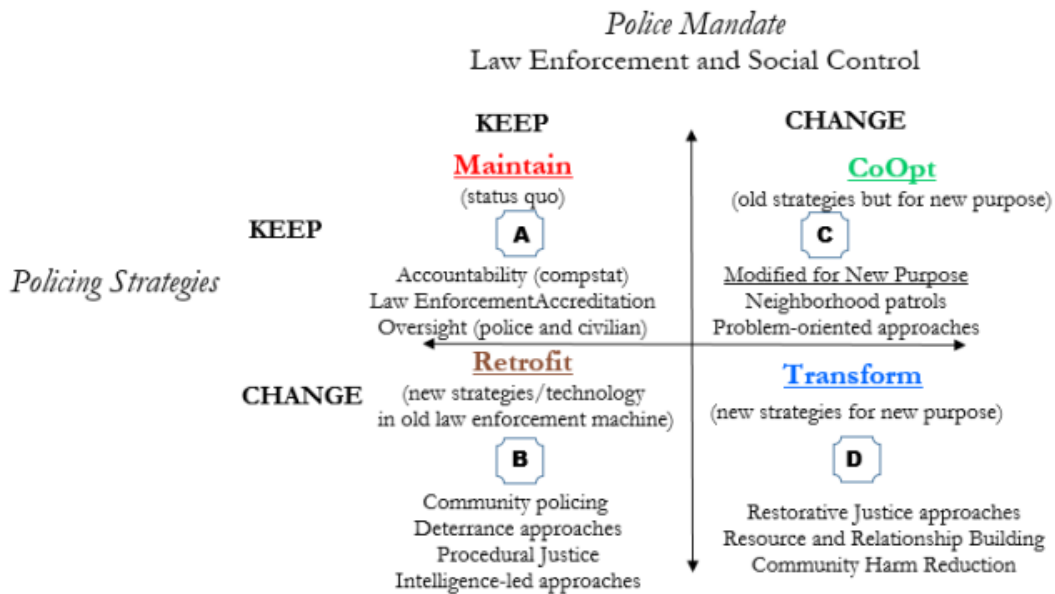
Ms. Phillips’s half-page response identified the Community Law Enforcement Accountability Network as an effort, made up of public defenders, advocates, researchers and journalists, with a goal “to build a federated system that will allow for tiered and appropriate access and accountability.”

B. Fons von Gessel Individual Response

Mr. von Gessel is associated with the Netherlands Ministry of Justice and Security. His short response noted that the ministry has an Information and Analysis Team including both law enforcement personnel and civil servants that works on issues of disaggregated criminal justice data.

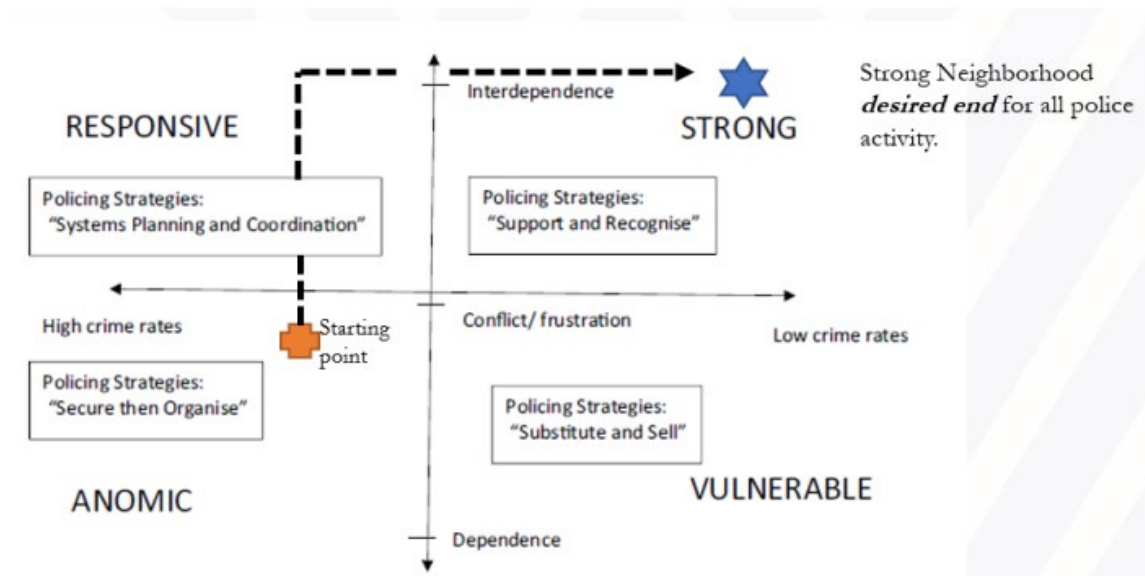
C. James Nolan Individual Response

Dr. Nolan’s seven-page response considered two topics. First, the response provided a theoretical basis for conceptualizing policing reform efforts and the implicit assumptions underlying this RFI.



Second, the response discussed the concept of “neighborhood atmosphere,” how atmosphere predicts the potential for violent crime, and measures of atmosphere. The response culminated in Dr. Nolan’s description of an optimal state for community safety

(“strong neighborhoods”) and policing strategies that are valuable in supporting that state (“support and recognize”).



D. Jerry Garner Individual Response

Mr. Garner based his response on his law enforcement background and experience, including as a chief of police. In a half-page response, he mentioned that a primary barrier for law enforcement departments to respond to Federal statistical requests is the complexity of reporting processes. He noted that his small law enforcement department, which participates in NIBRS and UCR, has had difficulties navigating the FBI Use-of-Force reporting. The response concluded, “In sum, greatly simplifying the reporting process in virtually every category of reporting would result in more data being submitted.”

E. Jerry Ratcliffe Individual Response

Professor Ratcliffe is a Professor in the Department of Criminal Justice at Temple University. This two-page response focused on the idea that crime statistics reporting should shift from a “push model,” whereby individual agencies and States collect, clean, standardize, and provide the data they collect to the Federal Government, to a “pull model.” This model builds on open data principles, whereby the Federal Government sets the standards for data format, data security, and remote data access as well as a certification process intended to assure compliance and then local and State law enforcement agencies build their own tools (or use commercially available tools) that conform to those standards, and then the Federal agencies pull the relevant data from individual STLT data systems when required. The response concludes, “By reducing the paperwork and communication

burdens on the local agencies, greater data quality, speed, and compliance could generate criminal justice data that are more complete and fit for purpose.”

F. Joel Garner Individual Response

Dr. Garner’s five-page response considers how to provide “guidance and support to STLT law enforcement agencies to implement best practices related to equitable data” in the context of the Police Public Contact Survey, the LEMAS program, the Fatal Encounters program, and the need for Federal law enforcement agencies to contribute to national statistics regarding use of force. His response concludes with five summary suggestions:

1. “It is important to use rigorous scientific methods to collect and analyze data about all incidents of police violence or other police behaviors of interest. Whether those data collections include demographic information is secondary at best.
2. The LEMAS program provides an example of how collaboration with law enforcement agencies can provide valuable descriptive data on police behavior as well as organizational characteristics of a national sample of law enforcement agencies. In addition, it appears to be an efficient mechanism to obtain reliable estimates of policing behavior.
3. Federal statistical agencies must embrace 21st-century methods of collecting and analyzing data about police behavior or die.
4. When federal law enforcement agencies are leaders in systematically collecting and rigorously analyzing individual-level data on police behavior, federal statistical agencies will have more success encouraging STLT agencies to adopt these practices and share their data with other agencies and the public.
5. While federal leadership and collaboration with STLT agencies is a more likely path to better descriptive data on police behavior, a small number of studies examining a variety of federal enforcement actions will provide a far more rigorous basis for determining how to reduce police violence.”

G. M. Chris Cox Individual Response

Mr. Cox’s half-page response focused on the subject of enhancing transparency while creating high-quality data. The response suggests three approaches:

1. “The first and easiest is to put everything on the internet. This would give researchers access to the data immediately. It is relatively inexpensive. However, there are many policy/legal reasons why doing so is problematic.
2. A second method is to fund researchers to work at each of the law enforcement offices. This would allow the researchers access to sensitive information, which

they could mine for data while also protecting privacy rights. However, this method would be very expensive.

3. The third way is to have universities work with law enforcement agencies, giving researchers access to the data. Through an MOU, the researcher would have access to the data, but would be precluded from publicizing sensitive information. (e.g., Privacy Act data). You might find that graduate students would be willing to mine data for relatively low cost, and they would not have to work for the agency. The benefit to graduate students is the opportunity to engage in research and produce meaningful science.”

H. Mark Beaudry Individual Response

Professor Beaudry is an Assistant Professor in the Criminal Justice Department at Worcester State University. The one-page response points to disconnects between academic researchers and STLT LEO practitioners, and suggests “embedding Academic Researchers into agencies to provide guidance and recommendations on ‘best practices.’”

I. Michael Melton Individual Response

Mr. Melton is a retired local law enforcement officer. His six-page response describes a change in policing procedures that would have the potential for reducing inequities in clearance rates for serious crimes. Mr. Melton’s response suggests greater use of “actuarial instruments based on solvability for case screening,” a proposal with three components:

1. “Preliminary Investigation: Augment the current case screening process for allocation of specialized investigative resources (e.g., Detective; Criminalist), which primarily looks at seriousness... [reference to internal footnote redacted] as part of the preliminary investigation, to include case screening of solvability criteria for select crimes, especially to include consideration of the outcome of an actuarial instrument as a part of a decision support process also involving structured professional judgement.
2. Teleforensics: Employ teleforensics technologies and practices to support real-time consultation between on-scene personnel who are responsible for any portion of the crime’s preliminary investigation and any needed off-site individuals who are suitable subject matter experts (SMEs).
3. Follow Up Investigation: Augment the typically used case screening process for investigative resource allocation and prioritization, which is employed at the initiation of the follow up investigation phase and is based primarily on solvability [reference to internal footnote redacted], to include consideration of the outcome of an actuarial instrument as a part of a decision support process that employs structured professional judgement.”

The response argues that this approach will lead to more effective collection of forensic evidence at the crime scene, increasing the likelihood that the perpetrator will be brought to justice and decreasing the likelihood of mistaken prosecutions and convictions.

J. Philip Mathew Stinson Individual Response

Professor Stinson, a Professor in the Criminal Justice Department at Bowling Green State University, provided a one-page response to the RFI. This response focused on the Henry A. Wallace Police Crime Database (<https://policecrime.bgsu.edu>) supported by the Police Integrity Research Group at Bowling Green. The database collects information on crimes committed by law enforcement officers. The project—funded first by DOJ’s National Institute of Justice and since 2015 by the Tides Foundation—has information on cases between 2005 and 2017 and is collecting information toward a 2023 release of 2018 police crime data.

K. The Policy Lab at Brown University Academic Network

This four-page response, from two researchers at Brown University, began by summarizing the results of a study of State and local integrated data systems across a variety of social policy domains, including criminal justice systems. The response described integrated data systems as “systems dedicated to aggregating individual level encounters between the public and state and local governments into publicly transparent and privacy protected data portals.” Most of the systems identified in their study contained health data (e.g., from Medicaid) or State-level education data. The response highlighted the North Carolina NC Justice Portal as an example of a State-level criminal justice integrated data system deserving of emulation for additional pilots. The response also points to the University of Michigan Criminal Justice Administrative Record System (CJARS), which gathers and harmonizes municipal criminal justice data for research purposes. The response recommends future pilots include:

- Assisting the law enforcement entity in setting up processes for accurate data collection.
- Automating processes, where cost effective.
- Providing value back to the law enforcement entity through dashboards, data analysis projects or interfaces with outside data.
- Establishing MOUs to carry out this work.
- Reporting the necessary aggregate statistics back up to the Federal Government and entities like CJARS.

- Creating open science materials, such as publicly posted data dictionaries describing what data is collected and how it is curated for what uses, and protocols for how to request access to data for research purposes.

L. Data Foundation Organizational Response

The four-page response from the group described the Policing in America Project and described some of the recommendations from the Data Foundation’s reports:

- Governments have a need for clear performance indicators on policing based on community satisfaction and perception.
- The use of learning agendas can help establish cycles of continuous evaluation and improvement.
- Local governments should allocate resources for relevant survey-based data collection about perceptions, experiences, and attitudes.
- DOJ BJS should provide support to local governments in collecting perception and attitudinal data at the local level.
- DOJ should include research activities related to improving services that over time enrich attitudes and perceptions as part of the departmental learning agenda and annual evaluation plan.
- The Federal Government can incentivize data transparency and accountability with publicly available, de-identified datasets that align with Uniform Crime Report data.
- Increasing transparency about non-reports of information in administrative records from jurisdictions across multiple data systems can improve research capabilities and knowledge for analysis (and research efficiency).
- Providing enhanced technical assistance for record management systems and data standards that align with relevant Federal reporting will improve data quality.

“The open data collected through the Policing in America Project is now available to be mapped to other available data assets for generating new insights that support ongoing and future research and analysis at the local level, and the insights can also be applied for understanding the relationship between perceptions of law enforcement agencies and the conditions in select cities and disaggregated by key characteristics of the population. The Policing in America Project led to important insights and recommendations in large part because we were able to stratify the datasets by key characteristics of interest, and I appeal to you to consider this information as part of this RFI and the efforts moving forward. While confined to only a small sample of jurisdictions in the United States, the model is one that could easily be extrapolated across the country—and transparently build credible, reliable knowledge in the years ahead.” – Data Foundation

M. Electronic Privacy Information Center Organizational Response

The five-page response from this group recommended to OSTP that it should “push agencies to redirect more of their existing resources toward complying with transparency obligations” and to “consider how data collection and processing can be harmful, particularly to vulnerable individuals and marginalized communities.” Other points in the response include:

- “Statistical data has been used for over 30 years to justify targeted policing practices that harm marginalized communities without contributing to public safety.”
- “Victims of crime shouldn’t have to feel like they’re being asked to decide whether to (1) give up their privacy or (2) receive services.”
- “We reiterate that the failures of law enforcement agencies to produce and publicize statistics do not reflect a pure lack of resources, but rather deliberate choices not to invest in transparency and public records infrastructure. Police departments should not be rewarded with more federal funds for systematic failures to comply with existing obligations. And all law enforcement agencies should be particularly careful with respect to the personal data of survivors of domestic violence and other vulnerable populations. At a minimum, departments should require differential privacy and other data protection techniques before publishing or making available datasets containing particularly sensitive information.”

N. ForceMetrics Organizational Response

The two-page ForceMetrics response describes the organization’s software platform as a “cloud-based web application available on desktops, laptops/mobile data terminals, and smartphones to provide data analytics and enrichment applications to public safety agencies throughout the United States.” The response does not directly address the questions in the RFI, but implicitly identifies what the company considers to be valuable characteristics of RMS systems such as: simplicity/ease of use, mobile functionality including automated geotagging, automating data input, automated tagging of free-form text, and incorporation of predictive policing tools.

O. Full Circle Training Solutions Organizational Response

The three-page response was based on the organization’s experience as training instructors for the FBI. Their core point is that “RMS Vendors have never had training on how to properly report NIBRS.” In addition to calling for more training efforts by the FBI aimed at RMS vendors themselves, the response noted that “via the FBI CJIS Division, the States CJIS Systems Agencies, or self-audits by the reporting agencies themselves. As the

operations/staffing/budget efforts of the past decade have been on increasing the number of NIBRS-certified agencies across the U.S., the number of quality assurance reviews (QARs) conducted at current NIBRS agencies to check data quality and ensure compliance with all FBI and State technical specifications have equally decreased.”

P. Latinas in Law Enforcement Organizational Response

The two-page response from this group—composed of female Hispanic and Latino law enforcement officers in the State of Illinois—called for more data collection regarding female law enforcement officers of color. The response stated, “There should be such collection and analysis in order to analyze such data to determine if (we believe it will prove that) women officers who come from the communities that they serve—especially in predominantly minority communities—have better outcomes because no one is collecting that data. With fewer complaints of excessive use of force and more trust of the community, women are getting the job done, and we need more! But any data collection on women officers is all lumped together as one data point.” The response concludes by proposing a pilot project to collect these disaggregated data.

Q. Major County Sheriffs of America Organizational Response

The two-page response included points that were germane to the themes of the RFI but did not attach those statements to particular RFI questions. Notable points included:

- “We recognize, however, that it is both time-consuming and expensive to collect more and more data about routine law enforcement activity, and there is wide variability among agencies and states in terms of capabilities and available resources to collect and report data. There is also wide variability in legal requirements, restrictions, and terminology among states and agencies, which makes it challenging to centralize or standardize data collection, analysis, and reporting.”
- “Any requirements at the local, state, or federal levels to collect and report data must be accompanied by resources to build and sustain those capabilities.”
- “Just as the public should expect accountability from law enforcement agencies and officers, they should also expect accountability from researchers and the media when data is analyzed and reported. Taken out of the context of broader community demographic and behavioral statistics, data regarding the activities of agencies and individual officers may be mischaracterized to drive certain agendas.”
- “MCSA believes that data collection and reporting for public accountability, transparency, and research purposes is important and valuable. At the same time, we urge full consideration of the challenges and risks associated with the types

of data that are collected, the granularity of collection, the analysis of data, and the public reporting of data. Smart approaches to data collection and reporting that account for both risks and opportunities can lead to enhanced community trust.”

R. National Policing Institute Organizational Response

The National Policing Institute submitted a five-page response to the RFI. The response was presented in light of Questions 1–3 of the RFI but did not align directly with the RFI’s questions. The response recommended the following:

- Reorganizing responsibility for Federal criminal justice statistical collections so that all programs currently managed by the FBI—and their funding—would be transferred to, and managed by, BJS.
- Revitalizing the Police Data Initiative and expanding its scope to include “open data sets from justice system components that have not fully embraced transparency, including prosecutors, courts, probation and parole, and corrections institutions.”
- The Federal Government should develop the “capacity of STLT law enforcement agencies in data collection by providing guidance to STLT agencies” on:
 - “Data collection priorities, based on past experience of the types of data that (1) drive the most critical insights or (2) have the most significant implications for operations and accountability.”
 - “Intra-governmental coordination and quality control between law enforcement agencies and other governmental entities that collect law enforcement relevant information, such as emergency call dispatch centers and oversight and investigative agencies.”
 - “Inter-governmental coordination to establish common terminology and common reporting standards across government agencies.”
 - “Impact of the data dissemination model on transparency and public trust. Data never speaks for itself: it is always subject to interpretation and requires context. The “right” context for understanding any given law enforcement metric will often be essentially contested. However, the Federal Government can provide general guidance on some foundational contextual information that should always be reported along with specific metrics or data types.”
 - “Attention to the problem of ‘selection on the outcome’ in public safety data collection. Much critically important law enforcement data is ‘selected on

the outcome,’ meaning that data is only collected when a certain event occurs, not when it could have occurred but did not....The Federal Government can provide technical guidance to STLT government on how to recognize that very common systematic bias in their collected data and how it should inform their internal analysis and public reporting.”

S. Project on Government Oversight Organizational Response

The eight-page response from the Project on Government Oversight did not specifically address the questions in the RFI but instead focused on two topics: (1) open data strategies and the value of pursuing greater transparency in criminal justice statistical data and (2) deaths in custody data (discussed in other responses under Question 3). Notable points included:

- “While no anonymization or de-identification method is foolproof, there are several widely practiced techniques that minimize the risk of identification. The DOJ should utilize these techniques to maximize disclosure of data. The databases should be monitored for potential problems and any identified issues or breaches should be addressed quickly.
- DOJ needs to develop guidance and incentives for jurisdictions to report Death in Custody Reporting Act (DCRA) data.
- DCRA reporting should use structured fields to capture the circumstances leading to deaths in custody.
- DOJ should audit DCRA data to prevent under-counting.
- DOJ is tasked “to find relationships, if any, between deaths in custody and administrative policies. But there are no data collection plans that would produce the information necessary to deliver on this requirement, particularly relating to administrative policies.”

“Public access to law enforcement data can also directly lead to better law enforcement outcomes. Making law enforcement data public means more people will review the data and help identify problem areas. Increased review means more chances to find things that might otherwise be missed or dismissed. Armed with information, community members can more effectively push for specific improvements in law enforcement performance, training and oversight. Finally, disclosure of data can also lead to better data in the long run. When data is made public, more people review and use the data. They provide feedback on data problems and needed improvements. Data users with different perspectives, such as researchers, journalists, or community residents, can raise concerns or offer recommendations that would elude government officials. Transparency also encourages accountability: agencies are more motivated to fix and improve databases that are publicly available to avoid scrutiny and criticism.”
– Project on Government Oversight

- DOJ needs to release DCRA data, “Withholding crucial information from the public concerning deaths in custody not only undermines the spirit of DCRA, but also prevents the public from holding the government accountable and pursuing reforms.”

T. Strategies for Youth Organizational Response

In a one-page response, Strategies for Youth identified that LEOs do not collect adequate data on interactions between youths and STLT LEOs, prosecutors, and courts. They submitted a draft policy as a supplement to their RFI response.

U. Tech5 USA Organizational Response

Tech5 USA submitted a five-page response to the RFI, which presented responses to many of the individual questions. The substance of the response, however, focused primarily on biometric technologies rather than being focused on the types of criminal justice data and databases described in the RFI itself. Points made in the Tech5 USA response include:

- “There are misperceptions that facial recognition technologies are biased from a gender or race perspective. Recommend looking at the recent White Paper published by the International Biometric Industry Association.”
- Related to protecting privacy, “Reference NIST recommendations SP 800-122, Guide to Protecting the Confidentiality of PII | CSRC (nist.gov).”
- Related to LEO use of biometric tools, “Commercial Booking systems are uniform in how they go about collecting, storing, and matching the biometric data to aid law enforcement. Newer systems are cloud based using a FISMA Moderate cloud environment.”
- Related to supporting smaller STLT LEOs, “Recommended a big brother program be adopted whereby large agencies can adopt smaller, more resource strained organizations, in close geographic proximity.”
- Related to data sharing, “you can consider making the data available to researchers on a secure government website with multifactor authentication for security. You must also promote the fact that the data is available. Recommend these promotions occur at relevant Public Safety Forums and Trade Shows. IACP, APCO, National Governors Association and others.”

V. The Sikh Coalition Organizational Response

The Sikh Coalition’s seven-page response noted that the U.S. Sikh community is a common target of hate crimes and focused on substantial under-reporting in current hate

crime data collection and limitations of statistical reporting methods, especially subsequent to the 2021 transition to NIBRS. The response made 14 recommendations for improving hate crime reporting and response:

1. “Mandatory hate crime data reporting: Law enforcement agencies receiving federal grants must be required to collect and report comprehensive and accurate hate crime data to the HCSP.
2. Mandatory hate crime training: Require regular, comprehensive hate crime training for all law enforcement officers to enhance their understanding, identification, and response to hate crimes.
3. Standardized reporting guidelines: Develop and implement standardized guidelines for law enforcement agencies to investigate, collect, classify, and report hate crime data, ensuring consistency across jurisdictions.
4. Regular independent audits: Conduct regular independent audits of law enforcement agencies’ hate crime data collection and reporting processes, with results made publicly available to ensure transparency and accountability.
5. Technical assistance and resources: Provide federal and state support to local law enforcement agencies through technical assistance, funding, and resources to improve their capacity for accurate and timely hate crime reporting and response.
6. Strengthening records management systems: Implement additional mechanisms within law enforcement records management systems to facilitate bias identification and accurate classifications of motives in hate crime cases.
7. Community outreach and collaboration: Develop and maintain strong relationships between law enforcement agencies and community advocates to increase awareness, reporting, and trust in the criminal justice system. Utilize cultural and community competency programs to help law enforcement understand the unique biases faced by specific communities.
8. Victim support and resources: Allocate funding to victim services organizations to provide support, resources, and assistance to victims of hate crimes, thereby encouraging reporting and addressing the needs of affected individuals that are also language accessible.
9. Non-law enforcement reporting initiatives: Encourage and support alternative reporting avenues, such as hotlines, online platforms, and community-based organizations, to capture a broader range of hate crime incidents and offer culturally competent resources.

10. Expanding data sharing with community organizations: Encourage law enforcement agencies to share anonymized hate crime data regularly with community organizations, advocacy groups, and academic institutions. This collaboration can help improve understanding of hate crimes, inform prevention and response strategies, and strengthen community trust in law enforcement.
11. Improve data disaggregation: Develop guidelines to collect more granular data on the identity of victims in both hate crimes and bias incidents, ensuring voluntary self-identification is encouraged and protected. This disaggregation will provide a clearer understanding of the specific communities being targeted and enable more targeted interventions and resources to address hate crimes and bias incidents effectively.
12. Public awareness campaigns: Launch public awareness campaigns to educate the general population about the nature, impact, and consequences of hate crimes, as well as the importance of reporting such incidents in a language-accessible format.
13. Regular evaluation and refinement of policies and practices: Regularly review and assess the effectiveness of hate crime policies, practices, and interventions to identify areas for improvement, share best practices, and ensure that efforts remain responsive to the evolving nature of hate crimes and the needs of affected communities.
14. Strengthening hate crime prosecution: Enhance the capacity of prosecutors to pursue hate crime cases by providing specialized training, resources, and support. Establish dedicated hate crime prosecution units within state and federal agencies to ensure effective, timely, and consistent handling of hate crime cases, which will send a strong message that such crimes are taken seriously and perpetrators will be held accountable.”

W. Treatment Advocacy Center Organizational Response

The Treatment Advocacy Center, in its three-page response, focused on issues related to the interactions between individuals with mental illness and law enforcement, especially with respect to the use of force by law enforcement professionals when encountering individuals with mental illnesses. Their response suggested:

- “People with serious mental illness are disproportionately overrepresented in police use-of-force cases compared to people with no serious mental illness.... Despite this, as of 2020, no states mandated collecting data about whether someone was in a mental-illness related crisis when they encountered law enforcement. Only Colorado mandated collection on the presence of documented mental disability of civilians involved in police shootings.”

- “Treatment Advocacy Center believes it is important to collect data about the presence of serious mental illness in encounters with law enforcement agencies.... Data collected with sufficient detail will allow policymakers to recommend changes to crisis response and policing capable of saving lives.”
- “The National Conference of State Legislatures database on the state laws surrounding Use-of-Force Data and Transparency is a good source for reviewing state laws relating to mandated data collection from state law enforcement agencies and requirements for making this data publicly available.” Other reports their response cited were:
 - A 2015 WNYC New York Public Radio report that police disciplinary records were available to the public in only 12 States: Lewis, R., Veltman, N., Landen, X. 2015. “Is Police Misconduct a Secret in Your State?” WNYC News. <https://www.wnyc.org/story/police-misconduct-records>.
 - Cook, S. J., & Fortunato, D. 2023. “The politics of police data: State legislative capacity and the transparency of state and substate agencies.” *American Political Science Review*, 117(1), 280–295.
 - The Treatment Advocacy Center. 2019. *Road Runners: The Role and Impact of Law Enforcement in Transporting Individuals with Severe Mental Illness*. The Treatment Advocacy Center. <https://www.treatmentadvocacycenter.org/storage/documents/Road-Runners.pdf>.
 - Laniyonu, A., & Goff, P. A. 2021. “Measuring disparities in police use of force and injury among persons with serious mental illness.” *BMC psychiatry*, 21, 1–8.

X. Vera Institute Organizational Response

The Vera Institute of Justice, in its five-page response, focused on issues related to two topics that did not align directly with the RFI’s questions: the need to increase police data transparency (although many of the responses on this topic align with responses to Question 3) and the need for a Federal role in establishing metrics of community safety. Points made in the response include:

- “The administration should mandate reporting to FBI’s National Use-of-Force Data Collection to improve completeness and ensure a federal source for tracking and public reporting on this information.”
- “The administration should prioritize fulfilling its commitment to establishing a National Law Enforcement Accountability Database. A federal system for tracking misconduct, sustained complaints, and decertification across

jurisdictions is essential to ensure that officers who abuse their power cannot move from one department to another, as well as to ensure police are accountable to the public.”

- “Leverage federal resources to support complete reporting of data on traffic and pedestrian stops and searches to allow analysis of the scale of police interactions with community members and analysis of disparities in the frequency and outcomes of these interactions.”
- “The administration should support efforts to ensure consistent and valid reporting of call types, as well as the interoperability of CFS data to other data on police interactions (e.g., stops, arrests, use of force). It should also support improvement and standardization of tracking behavioral health-related calls in CFS data.”
- “DOJ should enhance transparency on data quality and the limitations of UCR crime data and related estimates.”
- “Identify a mechanism for increasing transparency and comparability of police budgets, such as standardizing and analyzing expenditures data reported in the BJS’ LEMAS survey.”
- “The administration should work with DOJ to create national standardized measures of affirmative community-based public safety.”

Appendix A. RFI Text

AGENCY: Office of Science and Technology Policy (OSTP).

ACTION: Notice of request for information.

SUMMARY:

Executive Order, *Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety*, states that building trust in policing and criminal justice requires “transparency through data collection and public reporting.” The Executive Order calls for issuing a report to the President on the current data collection, use, and data transparency practices with respect to law enforcement activities. This includes data related to calls for service, searches, stops, frisks, seizures, arrests, complaints, law enforcement demographics, and civil asset forfeiture. The White House Office of Science and Technology Policy (OSTP), on behalf of the National Science and Technology Council (NSTC) and in coordination with the Assistant to the President for Domestic Policy, is requesting public input to inform this report.

DATES:

Interested persons and organizations are invited to submit comments on or before 5 p.m. ET March 30, 2023.

ADDRESSES:

You may submit comments by any of the following methods:

- *Email:* equitabledata@ostp.eop.gov, include “Criminal Justice Statistics RFI” in the message subject line. Email submissions should be machine-readable [PDF, Word], all attachments must be 25MB or less, and responses should not be copy-protected. Due to time constraints, mailed paper submissions will not be accepted, and electronic submissions received after the deadline cannot be ensured to be incorporated or taken into consideration.

Instructions: Response to this RFI is voluntary. Each responding entity (individual or organization) is requested to submit only one response, in English. Respondents may answer as many or as few questions as they wish. Please identify the question number(s) associated with your answer. Submissions must be at most 7 pages in 11-point or larger font (3,500 words). Responses should include the name of the person(s) or organization(s) filing the comment, as well as the respondent type (*e.g.*, academic

institution, advocacy group, professional society, community-based organization, industry, member of the public, government, or other).

We encourage all members of the public interested in this initiative to submit their comments. OSTP and the Criminal Justice Statistics Working Group will consider each comment, whether it contains a personal narrative, experiences with the Federal government, or more technical legal, research, or scientific content.

OSTP will not respond directly to submissions. This RFI is not accepting applications for financial assistance or financial incentives. Comments submitted in response to this notice are subject to the Freedom of Information Act (FOIA). Responses to this RFI may be posted online without notice. OSTP requests that no proprietary, copyrighted, or personally identifiable information be submitted in response to this RFI.

In accordance with FAR 15-202(3), responses to this notice are not offers and cannot be accepted by the U.S. Government to form a binding contract. Additionally, the U.S. Government will not pay for response preparation or the use of any information contained in the response.

FOR FURTHER INFORMATION CONTACT:

Karin Underwood, at OSTP, by email at equitabledata@ostp.eop.gov or by phone at 202-456-6121. Individuals who use telecommunication devices for the deaf and hard of hearing (TDD) may call the Federal Relay Service (FRS) at 1-800-877-8339, 24 hours a day, every day of the year, including holidays.

SUPPLEMENTARY INFORMATION:

On May 25, 2022, President Biden signed an Executive Order (E.O.) on *Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety* ([E.O. 14074](#)). This E.O. aimed to enhance public trust and public safety by promoting accountability, transparency, equality, and dignity in policing and the criminal justice system. The E.O. recognized that better data practices are a vital component of advancing these objectives, noting that “Building trust between law enforcement agencies and the communities they are sworn to protect and serve also requires accountability for misconduct and transparency through data collection and public reporting.”

Improving the collection, use, and transparency of criminal justice data enables a more rigorous assessment of the extent to which law enforcement agency procedures and policies yield fair, just, and impartial treatment of all individuals, including those in underserved communities. To improve outcomes for communities, we need to identify effective and emerging practices and opportunities to accelerate the adoption and adaptation of those practices across the nation's approximately 18,000 State, Tribal, local, territorial (STLT) law enforcement agencies. To help reach this goal, the E.O. directed the **Equitable Data Working Group** to work with the **National Science and**

Technology Council (NSTC) to create an **Interagency Working Group on Criminal Justice Statistics** and tasked this group to develop a report about how to collect and publish data on police practices.

In this RFI, we are seeking the following:

1. Information to understand the current data collection, use, and transparency practices across STLT law enforcement activities.
2. Best practice examples and lessons learned from STLT law enforcement agencies and other entities in the criminal justice system related to how they have collected, used, and/or made transparent data disaggregated by demographic information, geographic information, and other variables to inform changes to policies, procedures, and protocols to produce more equitable outcomes.
3. Recommendations on how to build the capacity and ability of STLT law enforcement agencies to collect, use, and make transparent, comprehensive, high-quality, and disaggregated data on law enforcement activities.

Law enforcement agencies can use data to foster collaborations across all levels of government, neighboring jurisdictions, and a diverse community of external organizations. Public-facing tools and dashboards can allow civil society organizations and communities to visualize and use data about police activities and chart their local law enforcement agency's progress toward equitable outcomes. However, for these efforts to increase police accountability and legitimacy and to improve community participation, they must take into account the data analysis capacity and resources of all stakeholders.

The Equitable Data Working Group noted in its recommendations that data disaggregation and transparency need to ensure that individual identities and personally identifiable information (PII) are protected. The stakes of data privacy are exceptionally high in criminal justice, where insufficient privacy and confidentiality can have a chilling effect on victim reporting—including for domestic violence and for hate crimes such as crimes targeted against LGBTQI+ people, religious minorities, and Asian American, Native Hawaiian, and Pacific Islander populations—which, in turn, reduces the ability of law enforcement to respond to, solve, and prevent crimes.^[12]

We invite members of the public to share perspectives on what could help achieve comprehensive and transparent criminal justice data and how the Interagency Working Group on Criminal Justice Statistics should address the requirements in [E.O. 14074](#).

Please consider the following when responding to this RFI:

- *Datasets:* The Working Group is tasked with issuing a report to the President that assesses current data collection, use, and data transparency practices with respect to law enforcement activities, including but not limited to calls for service, searches, stops, frisks, seizures, arrests, complaints, law enforcement demographics, and civil asset

forfeiture. Additional datasets about law enforcement activities to consider include, but are not limited to: use-of-force, officer-involved shootings, de-escalation incidents, incidents (including the federally-reported National Incident-Based Reporting System, NIBRS), hate/bias crimes; solicitations, fees and fines, officer training, community engagement, vehicle pursuits, body-worn camera/dashboard camera metadata, accidents/crashes, patrol locations, and assaults on officers. This RFI does *not* include surveillance technologies or body-worn camera imagery.

- *Law enforcement agencies:* This Working Group focuses on policing and criminal justice data from STLT law enforcement agencies, *not* Federal law enforcement, which is covered elsewhere in the E.O.

- *Equitable data:* Equitable data refers to data that allow for rigorous assessment of the extent to which government programs and policies yield consistently fair, just, and impartial treatment of all individuals, including those who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Equitable data can illuminate opportunities for targeted actions that will result in demonstrably improved outcomes for underserved communities.

- *Disaggregated data:* One key characteristic of equitable data is that it is disaggregated, or broken down into detailed sub-categories that will differ based on the context and desired policy outcomes. For example, data might be disaggregated by demographics (*e.g.*, race, ethnicity, gender identity, sexual orientation,^[3] language spoken, national origin), geography (*e.g.*, rural/urban, police district, neighborhood), or other variables (disability, veteran status, housing status), enabling insights on disparities in access to, and outcomes from, government programs, policies, and services.

Additional context: The Equitable Data Working Group was established by President Biden's first Executive Order, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government ([E.O. 13985](#)), to study Federal data collection policies, programs, and infrastructure to identify inadequacies and provide recommendations that lay out a strategy to “expand and refine the data available to the Federal Government to measure equity and capture the diversity of the American people.” The **Criminal Justice Statistics Working Group** is now part of the **NSTC Subcommittee on Equitable Data**. It includes representatives of the Domestic Policy Council, the Office of the Counsel to the President, the Department of Justice, the Office of Management and Budget, the Office of Science and Technology Policy, the Gender Policy Council, the Office of Drug Control Policy, the Centers for Disease Control, the Department of Homeland Security, the Department of Education, and the General Services Administration.

Request for Information

OSTP seeks responses to the following questions about how STLT law enforcement agencies collect, use, and make data transparent to inform policies, procedures, and

protocols to reduce disparities. Respondents may provide information for one or more topics below, as desired.

1. What existing reports or research should the Federal government review to better understand and assess the status of data collection, use, and transparency in STLT law enforcement agencies? What are the findings of researchers, groups, and organizations researching the status of law enforcement agencies' data practices in general and disaggregated by sociodemographic and geographic variables in particular?
2. What are promising and effective models for, and what are lessons learned from, how law enforcement agencies collect, use, and share disaggregated data to inform policies, procedures, and training to reduce disparities in policing? What are some examples of law enforcement agencies using these models? *Note:* We are seeking models and examples that collect, use, and share disaggregated data while being intentional about when data are collected and shared, as well as how data are protected.
3. What datasets are critical for law enforcement agencies to collect in order to ensure the comprehensive and disaggregated collection of operational data, incident-based datasets, and other data to produce more equitable outcomes? Why?
4. What communities of practice or collaborations can law enforcement agencies participate in to improve how they collect comprehensive, quality, and disaggregated data to identify and address disparities? How can the Federal government encourage and support the development of collaborations to further promote the exchange of ideas and best practices?
5. What *is* and *is not* working regarding how the Federal government supports the collection, use, and transparency of disaggregated data on law enforcement activities, and why?
6. What specific challenges and opportunities do small and resource-constrained STLT law enforcement agencies face in the collection, use, and transparency of disaggregated data to inform more equitable outcomes?
7. How can software vendors (including those that build records management systems (RMS) and other systems) improve software design, development, and deployment to reduce barriers for law enforcement agencies to collect, use, and share comprehensive, quality, and disaggregated data and further incentivize them to produce more equitable outcomes?
8. How might professional, academic, nonprofit, and philanthropic organizations support and/or make investments to help law enforcement agencies advance equitable and disaggregated data practices?

Data Collection

9. How might the Federal government better understand and improve the technologies and data systems that law enforcement agencies use to collect disaggregated data?
10. What standards must be implemented to reduce barriers to data collection from law enforcement? What organizations or models of data standards exist that could serve as a model to inform more standardized police and criminal justice data collection in the future?
11. What are valuable models and lessons learned from data collected by organizations, groups, and researchers other than law enforcement agencies that are related to law enforcement activities? How might these practices lead to the valuable data collection that law enforcement agencies are unable or unwilling to collect on their own?

Use of Data

12. What are effective examples, and what lessons have been learned from how law enforcement agencies use data policies, tools, and practices to improve how police officers interact with underserved populations?
13. What are examples of law enforcement agencies using data policies, tools, and practices that have and have not improved how police officers collect, maintain, review, and act upon data regarding sexual assault, domestic violence, and other forms of gender-based violence?
14. What investments in human capital and data infrastructure can STLT law enforcement agencies make to disaggregate data and conduct equity assessments to inform policies, programs, and protocols to reduce disparities?
15. How might philanthropic organizations and academic researchers work effectively with government officials to evaluate and improve data collection, use, and transparency practices for small and resource-constrained STLT law enforcement agencies?

Data Transparency

16. What are exemplary models of police-community partnerships where police actively work with the community to share data findings and discuss how these data can address community needs? What lessons have been learned?
17. To what extent do law enforcement agencies currently make data publicly available about their efforts to reduce disparities in policing outcomes? What are examples and opportunities for law enforcement agencies to use relevant and accessible approaches to data transparency?

18. How might small and resource-constrained jurisdictions participate in public data sharing and use it to inform decision-making and increase accountability?
19. What relationship-building and what resources would be effective for expanding opportunities for historically underrepresented scholars and research institutions to access law enforcement data while protecting privacy?
20. The E.O. intends to maximize STLT participation in the National Incident-Based Report System (NIBRS). What are the barriers and opportunities for improving agency participation in NIBRS, including its hate crime reporting section and the FBI's National Use-Of-Force Data Collection?
21. How might the Federal government better share the criminal justice data it collects through surveys and programs like these in a manner that assists and empowers STLT government officials, researchers, and civil society to make use of such data to understand trends and inform policy decisions?

Dated: February 10, 2023.

Rachel Wallace,

Deputy General Counsel.

Footnotes

1. National Science and Technology Council: Federal Evidence Agenda on LGBTQI+ Equity.
2. DOJ Office of Violence Against Women: Improving Law Enforcement Response to Sexual Assault and Domestic Violence by Preventing Gender.
3. The Federal Evidence Agenda on LGBTQI+ Equity includes guidelines for collecting sexual orientation and gender identity (SOGI) data on forms and in other administrative contexts such as policing and criminal justice.

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Appendix B.

List of Respondents, by Organization Type

- Individual responses
 - Academia/university
 - Aki Roberts, University of Wisconsin at Milwaukee
 - Carolyn Coles, University of California at Irvine
 - Cheryl Phillips, Stanford University
 - James Nolan, West Virginia University
 - Janet Lauritsen, University of Missouri St. Louis
 - Jerry Ratcliffe, Temple University
 - Joel Caplan, Rutgers University
 - Justin Nix, University of Nebraska at Omaha
 - Mark Beaudry, Worcester State University
 - Melissa Hamilton, University of Surrey
 - Philip Matthew Stinson, Bowling Green State University
 - Federal (including national-level international) LEO
 - Fons van Gessel, Netherlands Ministry of Justice and Security
 - Joel Garner, formerly Bureau of Justice Statistics, Department of Justice
 - Journalism
 - Nick Thieme, The Baltimore Banner
 - STLT LEO
 - Jerry Garner
 - Michael Melton, LAPD (retired)
 - Renee Mitchell
 - Unknown/no affiliation listed
 - Clinton Johnson

- Ken Rineer
- M. Chris Cox
- Academic groups or networks
 - Cline Center for Advanced Social Research
 - Justice Collaboratory, Yale University
 - The Policing Project, NYU
 - The Policy Lab, Brown University
 - Williams Institute at UCLA
- Organizational responses
 - Federal LEO
 - FBI Criminal Justice Information Services Division
 - Industry
 - Axon
 - Benchmark Analytics
 - Cyrun
 - Esri
 - ForceMetrics
 - Full Circle Training Solutions
 - In-Synch Systems
 - Intersystems
 - Jensen Hughes
 - LEFTA Systems
 - Mark43
 - Simsi, Inc.
 - SmartForce Technologies, Inc.
 - SSBI Digital
 - Tech5 USA
 - TEI Software Development
 - Tyler Technologies

- Valkyrie Intelligence
- Wormeli Consulting, LLC
- Industry group
 - CEO Action for Racial Equity
- Research entities
 - Evident Change
 - RTI International
- Stakeholder groups/NGOs
 - Arnold Ventures, LLC
 - Campaign Zero
 - Center for Policing Equity
 - Civic Hacker
 - Council on Criminal Justice
 - Council of State Governments Justice Center
 - Data Foundation
 - Electronic Privacy Information Center
 - Gathering for Justice
 - Giffords Law Center to Prevent Gun Violence
 - IJIS Institute
 - Mapping Police Violence
 - Measures for Justice
 - NAACP Legal Defense and Educational Fund
 - National Alliance on Mental Illness
 - National Association of Criminal Defense Lawyers
 - National Disability Rights Network
 - National Police Accountability Project
 - National Policing Institute
 - Project on Government Oversight
 - Safe States Alliance

- SEARCH - The National Consortium for Justice Information and Statistics
- SpotCrime
- Strategies for Youth
- The Leadership Conference on Civil and Human Rights
- The Sikh Coalition
- Treatment Advocacy Center
- Vera Institute
- STLT LEO
 - International Association of Chiefs of Police
 - Iowa Department of Public Safety
 - Latinas in Law Enforcement
 - Major County Sheriffs of America
 - Minnesota Bureau of Criminal Apprehension
 - North Carolina Governor's Crime Commission
 - Oregon DPSST
 - Prince William County Police Department
 - Texas Department of Public Safety
 - Virginia State Police

Appendix C.

List of Data Sources from Question 1

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- Bureau of Justice Statistics. 2020. “Law Enforcement Management and Administrative Statistics (LEMAS).” (FBI CJIS)
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 - National Use-of-Force Data Collection
 - Law Enforcement Suicide Data Collection
 - Law Enforcement Officers Killed and Assaulted
 - Law Enforcement Employee Counts
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Abbreviations

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| API | Application Programming Interface |
| BCA | Bureau of Criminal Apprehension |
| BJS | Department of Justice Bureau of Justice Statistics |
| CDC | Centers for Disease Control and Prevention |
| CDE | Crime Data Explorer |
| CHIEF | Criminal History Information Exchange Format |
| CJARS | Criminal Justice Administrative Record System |
| CJI | Criminal Justice Information |
| CJIS | Criminal Justice Information Services |
| DCRA | Death in Custody Reporting Act |
| DOJ | Department of Justice |
| DPS | Department of Public Safety |
| DPSST | Dept. of Public Safety Standards & Training |
| FBI | Federal Bureau of Investigation |
| GCC | Governor's Crime Commission |
| HIEs | Health Information Exchanges |
| IACP | International Association of Chiefs of Police |
| IDA | Institute for Defense Analyses |
| IEEE | Institute of Electrical and Electronics Engineers |
| LDF | Legal Defense Fund |
| LEMAS | National Information Exchange Model |
| LEO | law enforcement organization |
| MOU | memoranda of understanding |
| NAACP | National Association for the Advancement of Colored People |
| NACDL | National Association of Criminal Defense Lawyers |
| NAMI | National Alliance on Mental Illness |
| NDRN | National Disability Rights Network |
| NGO | non-governmental organization |
| NIBRS | National Incident-Based Reporting System |
| NIEM | National Information Exchange Model |
| OSTP | Office of Science and Technology Policy |
| PII | personally identifiable information |
| RFI | request for information |
| RMS | records management system |
| SMEs | subject matter experts |
| STLT | state, tribal, local, and territorial |
| STPI | Science and Technology Policy Institute |
| UCR | Uniform Crime Reporting |

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