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**Via Electronic Submission ([equitabledata@ostp.eop.gov](mailto:equitabledata@ostp.eop.gov))**

Karin Underwood  
Office of Science and Technology Policy  
The White House

**Re: Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety - E.O. 14074  
Criminal Justice Statistics Request for Information**

To Whom It May Concern:

Campaign Zero welcomes the [request for information](#) as part of President Biden's Executive Order in "Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety" ([Executive Order 14074](#)).

As per the request and invitation by the Office of Science and Technology Policy (OSTP), we have responded to the following questions:

- **[RFI #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 state, tribal, local, territorial (STLT) law enforcement agencies (LEAs)? 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?
- **[RFI #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?
- **[RFI #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?
- **[RFI #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?
- **[RFI #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?

We can end police violence in America.

[www.campaignzero.org](http://www.campaignzero.org)



## About Campaign Zero

[Campaign Zero](#) is a project of the non-profit 501(c)(3) organization WeTheProtesters that was launched in August 2015 as a research-based platform to understand and advocate for public safety beyond policing. Since its inception, Campaign Zero has designed and launched research and advocacy projects that have defined their respective field and there are more to come. Notable projects include [Mapping Police Violence \(MPV\)](#), [8 Can't Wait](#), [Nix The 6](#), [End Qualified Immunity](#), [Cancel ShotSpotter](#), and [Raise the Threshold](#). More campaigns can be found [here](#). Our tax ID number is 81-3764408.

## CZ Framing & Approach

In 2015, Campaign Zero launched Mapping Police Violence (MPV) which aims to capture all incidents where a civilian is killed at the hands of US law enforcement. In 2022, the MPV team engaged in a significant overhaul and redesign of the MPV [webpage](#), [methodology](#), and data backend to ensure its sustainability, data integrity, research rigor, and scalability. This included improving detection of incidents, automating data collection and research management operations, deploying advanced technologies and algorithms, and expanded staffing. This has also allowed us to become more transparent and commit to the [Open Science Framework](#) to advance trust and inclusion. Please refer to the following resources and links for seeing the platform in action:

- [Front-End Public Data Visualization Platform](#)
- [Publicly Accessible Dataset](#)
- [Data and Methodology documentation](#).

In 2022, [1,238 persons were killed by US law enforcement](#) according to our database ([mappingpoliceviolence.org](#)); this is the highest number of killings recorded since we started collecting data in 2013. The current outcomes of police violence and mass incarceration are failing communities, with an average of 3 people killed by police each day, more than 10 million people cycling in and out of jails each year, and approximately 1 in 6 Black men being incarcerated in their lifetime. Further, we find that Blacks in the US are nearly three times more likely to be killed by police than Whites (Mapping Police Violence, 2023). As a result, we urge that all data collected should include demographic information, particularly on race, given continued mistreatment of Black and Brown US populations. Without demographic and race information, no study of the US criminal legal system will be sufficient (King and Smith 2005; Lerman and Weaver 2016). We believe all criminal legal data should be publicly accessible at no cost.

Further, we urge that all criminal legal and social indicator data is contextualized by urban state making and the carceral response to the criminalization of blackness, poverty, and social problems in the US (Muhammad 2010; Hinton 2022).



# Campaign Zero Responses to RFI

<b>RFI #1</b>	<b>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?</b>
<b>CZ response to RFI #1</b>	<p><b>Research &amp; reports to review concerning law enforcement data</b></p> <ul style="list-style-type: none"><li>→ <a href="#">CZ's Mapping Police Violence</a>. Law enforcement agencies and the government fail to provide accurate numbers on the number of lives taken by law enforcement. CZ's MPV tracks data on US police killings through advanced technologies and a rigorous methodology to ensure data integrity.</li><li>→ <a href="#">Vera Police Transparency Index</a>. Helps identify critical information gaps in law enforcement data reporting such as use of force, arrests, and civilian complaints.</li><li>→ <a href="#">Invisible Institute's Citizen Police Data Project</a>. A model for standardizing police discipline and citizen complaint data.</li><li>→ <a href="#">CZ's Police Scorecard</a>. A nationwide scorecard for US law enforcement agencies examining data across multiple dimensions.</li></ul> <p><b>Research expanding a shared understanding of public safety</b></p> <p>In a time where public safety is being redefined, there is little discussion or centering of how historically disinvested Black and Brown communities define public safety and what contributes to safer communities. It is critical that the federal government recommends standards and recommendations for jurisdictions engaging in public safety reinvention. One model which should be used as a framework is the NYC Neighborhood Navigator which was developed to support the work of the NYC Office of Neighborhood Safety based out of the NYC Mayor's Office of Criminal Justice:</p> <ul style="list-style-type: none"><li>→ <a href="#">NYC Neighborhood Navigator</a>. "The NYC Office of Neighborhood Safety (ONS) Neighborhood Navigator was born out of the need to render how the programming and theories of change of the Office of Neighborhood Safety, which centers community and participatory governance in co-producing safety and thriving, is the way we should work with community to build safe and thriving communities across NYC."<ul style="list-style-type: none"><li>↳ <a href="#">Columbia University social media analysis</a></li><li>↳ <a href="#">Participatory action research derived framework/measures for understanding public safety</a></li><li>↳ <a href="#">NORC at UChicago's panel survey results shown alongside public social indicators</a></li></ul></li></ul>



## RFI #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?**

### CZ response to RFI #10

#### Improving reporting

First, it is critical that the federal government find ways to require reporting across law enforcement agencies. Without most jurisdictions reporting, standards to report will fail to have the intended outcome to better understand the landscape of US law enforcement. We recommend the following steps be taken to improve reporting:

1. US STLT law enforcement agencies failing to report data to the federal government are ineligible for any federal funding:
  - ↳ Exception: US STLT law enforcement agencies without capacity to report data will need to provide sufficient internal documentation to show lack of capacity for reporting and will be given a set period of three years to reach the reporting requirement;
2. US STLT law enforcement agencies failing to report data to the federal government will not be permitted to have any of its members employed in any form, contractually or not, serve as technical assistance staff, or advising for federal programs or any programs administered by organizations funded by federal funding.

#### Model standards

We will defer to our colleagues regarding their expertise on the issues concerning the NIBRS transition, given that it has resulted in significant issues with standardization and reporting. However, in terms of models and standards for the future, we believe the state of California has made significant strides when it comes to mandating reporting for police departments and creating uniform standards which would allow for cross-sectional analysis of agencies.

#### Future data collection

The federal government should create a working group to identify other types of data which should be collected and needs a framework for standardization. For example, in 2019, the state of California passed the Racial and Identity Profiling Act (RIPA) which requires agencies to collect and report data on the demographics of individuals who are stopped and searched by the police. Other types of data that should be collected and reported publicly includes the following stratified by demographics (i.e., race, gender, age, etc.):

- Reporting of data by third-party entities involved with STLT law enforcement (i.e. gun detection technology, etc.);
- Front-end call for service data (i.e. Computer-Aided Dispatch, etc.); and
- Officer misconduct data (i.e. suspension, termination, decertification, etc.).



## RFI #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?**

### CZ Response to RFI #11

#### Landscape of data on police killings of civilians in the US

Given the failure of the US federal government in producing transparent and reliable data updates tracking lives taken by US law enforcement, this critical gap has been filled by three different non-governmental data sources, one being Campaign Zero's Mapping Police Violence (MPV). In 2019, the FBI launched the data collection efforts for the [National Use of Force database](#). However, participation is voluntary and granular-level agency data still has not been released. *Thus, to date, there is still no US Government data source which captures all killings by US law enforcement with relevant contextual and demographic information of the victims.*<sup>1</sup> The only governmental data source which could be used to identify police killings of civilians is the [National Vital Statistics System \(NVSS\)](#) maintained and monitored by the Centers for Disease Control (CDC). However, the dataset, consisting of birth and death certificate data, suffers from severe undercounting and underreporting concerns. Specifically, the authors of one [study](#), using several data sources, including MPV, find that NVSS undercounts police killings by 55%.

#### Recommendation & models

1. We applaud efforts by individual LEAs such as the [San Antonio Police Department](#) and the Los Angeles Police Department that report all [officer-involved shootings and critical incidents](#) on a monthly basis with critical details including the officer's name and race, the victim's name, circumstances of the incident, date and time, and location information. For example, there have been instances where our MPV researchers have struggled to obtain the names or identify the victims for more than 5 years following an incident. We urge the federal government to take actions to require details for all officer-involved killings to be reported publicly and include the following information to allow for organic accountability and improved data integrity for data platforms like MPV:
  - name of victim
  - victim age
  - victim race
  - date of incident

<sup>1</sup> In 2019, the U.S. The Department of Justice (DoJ) [launched](#) the National Use-Of-Force Data Collection. However, one [investigation](#) found that the FBI was falling short in data collection efforts. In 2021, an [announcement](#) from the DoJ indicated that the program may be shut down given the lack of participation from law enforcement agencies, requiring a 60% participation threshold to release data.



	<ul style="list-style-type: none"><li>→ location of incident</li><li>→ cause of death (release of coroners/medical examiner reports)</li><li>→ STLT agency responsible</li><li>→ circumstances of incident</li><li>→ officer name</li><li>→ officer race</li><li>→ officer past history</li><li>→ if and how administrative discipline was administered</li><li>→ activity that caused the police to engage the victim</li><li>→ source of incident (call for service or officer-initiated)</li><li>→ body camera or dash camera footage?</li><li>→ off duty or on duty</li></ul> <ol style="list-style-type: none"><li>2. <u>We urge the federal government to publicly recognize MPV and the Washington Post’s Fatal Force databases in DoJ government reporting and recommend STLT agencies to report missing and future fatal encounters to the databases.</u></li><li>3. Given research finding that families of LEAs are more likely to experience domestic violence than the general population, it is important to improve reporting and accountability (Johnson, 1991; Neidig, Russell, and Seng, 1992). <u>LEAs accused of crimes such as domestic violence, assault, and other crimes should be reported publicly to allow the public to better understand these incidents and improve transparency.</u></li><li>4. <u>We urge the federal government to develop a framework for categorizing, collecting, and reporting this data at the state-level.</u></li><li>5. <u>As stated above, we urge the federal government to look at the Invisible Institute’s Citizen Police Data Project as a model for standardizing police discipline data.</u></li></ol>
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**RFI # 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?**

**CZ  
Response to  
RFI #17**

As noted in [Knox, Lowe, and Mummolo \(2020\)](#), it is critical that law enforcement agencies publish interaction data to better understand the extent of racial bias. Without interaction data, it is difficult for researchers to understand the extent of bias with treatment data exclusively (i.e. Arrest, Use-Of-Force, etc.).

Individual agencies like the Seattle Police Department (SPD), Los Angeles Police Department (LAPD), and NYC Police Department (NYPD) all have taken significant steps to release data publicly around different outcomes. We encourage that other STLT agencies follow in the footsteps. However, we urge that the federal government take steps to encourage states to standardize this data at the state level to allow for more uniformity and better reporting. To reiterate, the state of California has made significant strides when it comes to mandating reporting for police departments.

We urge that the federal government create standards and open source systems for state or individual STLT agencies to collect and publicly report on the following types of data (disaggregated by demographics) to allow for further research understanding policing outcomes:

- **Front-end.** All data relating to any prior enforcement action taken by STLT LEA officers (i.e. computer-aided dispatch data, stop & search, gun detection technology, etc.)
- **Enforcement actions.** All data relating to when a STLT officer takes an action after an interaction with a civilian (i.e. diversion, detention, arrest, use of force, etc).
- **Administrative activities.** All data relating to administrative activities taken by an agency relating to officer activities (i.e. officer investigations, suspensions, terminations, etc.)
- **Outcomes.** All data relating to the activities following an enforcement activity (i.e. prosecution, pre-trial, pre-sentencing, courts, etc.).
- **Back-end.** All data relating to incarceration and release data (i.e. prisons, probation, parole, etc.)



## RFI #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?

### CZ Response to RFI #21

There are several steps the federal government can do to increase accessibility and quality of criminal justice data:

- **Improving granularity and cadence of National Crime Victimization Survey data.** It is important that the federal government continues NCVS collection. We urge the DoJ to improve the granularity across the data to allow the inclusion of demographics and geography to improve spatial understanding of victimizations.
- **Improving cadence, quality, and feedback for the Law Enforcement Management & Administrative Survey (LEMAS).** The LEMAS dataset is a critical source of data to understand context to law enforcement in the US. We urge the DoJ to (1) increase the cadence of administration, (2) continue to keep the same questions to allow for research through panel data approaches, and (3) allow for a working group to engage the public on what questions and data should be collected through the survey.
- **Centers for Disease Control H-CUP Data.** CZ's ongoing partnership with a university conducting research on police violence has made clear the importance of hospital data, but also has revealed the inaccessibility and costly nature of CDC H-CUP data. We believe there is critical information in hospital data that can better inform the operation of the criminal justice system. Thus, we urge the federal government to make this data available at no cost to universities and research institutions that are interested in studying criminal justice statistics through the public health system and already have the appropriate protocols and institutional review board procedures in place to ingest said data.
- **Harmonizing historical criminal justice statistics with modern data.** CZ's ongoing work to understand safety indicators has identified critical gaps and a lack of standards in harmonizing historical and modern criminal justice data. We urge the DoJ to develop and operationalize a model to harmonize historical and modern criminal justice data.
- **Centralizing criminal justice statistics through one API.** Currently the FBI UCR, BOP, and other US DoJ datasets live in different areas. We urge (1) for the federal government to start the process of centralizing all criminal justice statistics to be accessible through one data portal and (2) assist the public identify gaps in criminal justice statistics to improve accessibility to the use of criminal justice data.





We support and applaud the Biden administration's efforts to raise awareness of this issue and appreciate the public process for comment. We welcome any questions, comments, or follow-up on this RFI.

respectfully submitted,

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