

WEST VIRGINIA
SECRETARY OF STATE
KEN HECHLER
ADMINISTRATIVE LAW DIVISION

Form #5

FILED
JUL 30 9 43 AM '97
OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW

AGENCY: WEST VIRGINIA STATE POLICE TITLE NUMBER: 81

CITE AUTHORITY: W. Va. Code 15-2-24

RULE TYPE: PROCEDURAL INTERPRETIVE

EXEMPT LEGISLATIVE RULE _____
CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW

AMENDMENT TO AN EXISTING RULE: YES _____, NO

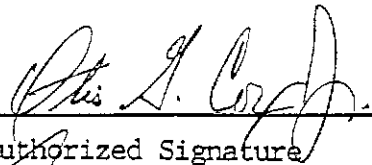
IF YES, SERIES NUMBER OF RULE BEING AMENDED: N/A

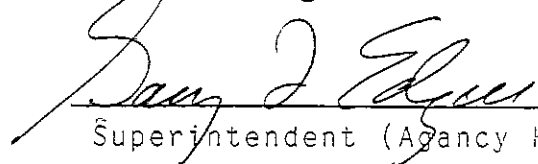
TITLE OF RULE BEING AMENDED: N/A

IF NO, SERIES NUMBER OF NEW RULE BEING ADOPTED: 11

TITLE OF RULE BEING ADOPTED: WEST VIRGINIA UNIFORM CRIME REPORTING
PROGRAM: GENERAL GUIDELINES AND REPORTING REQUIREMENTS

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS September 2, 1997


Authorized Signature


Superintendent (Agency Head)



West Virginia State Police
725 Jefferson Road
South Charleston, West Virginia 25309-1698
Executive Office

Cecil H. Underwood
Governor

Colonel Gary L. Edgell
Superintendent

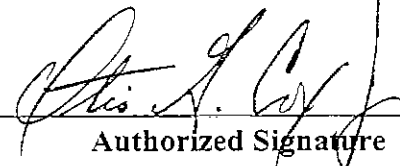
TO: Secretary of State
Legislative Rule Making

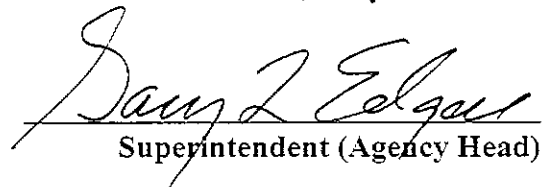
FROM: West Virginia State Police

DATE: July 30, 1997

RE: Procedural Rule
"West Virginia Uniform Crime Reporting Program; General
Guidelines and Reporting Requirements"
Title 81
Series 11

The accompanying procedural rule was filed for a notice comment period on June 6, 1997. Subsequently, two letters were received in response to the new rule. In response to these letters, several changes have been made to the proposed rule. These changes are detailed in the accompanying pages to the rule. Therefore, the proposed rule is hereby approved by the promulgating agency for final filing with the Secretary of State.


Authorized Signature


Superintendent (Agency Head)

**The Department of Military Affairs and Public Safety**

WALTER SMITTLE III
State Fire Marshal
L. DARL CROSS
Chief Deputy Fire Marshal

CECIL H. UNDERWOOD, GOVERNOR
STATE FIRE MARSHAL'S OFFICE
1207 Quarrier Street, 2nd Floor
Charleston, West Virginia 25301

Phone (304) 558-2191
FAX (304) 558-2537

June 27, 1997

The Honorable Ken Hechler
Secretary of State
State Capitol
Charleston, WV 25305

Re: WV Procedural Rule, Dept. Of Military Affairs & Public Safety
WV State Police, Title 81, Series II

Dear Mr. Secretary:

The proposed procedural rule has been reviewed by this agency. The following are recommendations to improve the procedures regarding "Jurisdictional Reporting - Section 6":

- (1) 6.1(1) Add the following words fter the word Arson,
"explosions & explosive related offenses" investigated by....

Justification: Adding these words will provide a better understanding of the types of investigations conducted by the Fire Marshal's Office.

- (2) Throughout Section 6 the name of this office is incorrectly spelled. Accordingly, the word Marshal is spelled with only one "L".

I thank you for the opportunity to provide input in this procedural rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter Smittle III".

Walter Smittle III
State Fire Marshal

WSIII/nlo

cc: Sergeant S. Gayle Midkiff
UCR Officer

Ref: 062797-2

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In response to the comments submitted by the WV State Fire Marshal's Office, the following revisions will be made.

6.1.1 Arsons explosions, and explosive related offenses investigated by the WV State Fire ~~Marshal's~~ Marshal's Office and their subsequent arrests are to be counted by the State Fire ~~Marshal's~~ Marshal's Office.

6.1.2 Those campus police agencies that possess an ORI and are identified as a UCR contributing agency count crimes and their subsequent arrests that occur on college/university property. Campus police are to count arsons, explosions, explosive related offenses and their subsequent arrests, if they are not investigated by the WV State Fire ~~Marshal's~~ Marshal's Office.

6.1.3 Municipal police departments count crimes and their subsequent arrests that occur within the city limits. If a crime occurs on college/university property which lies within the city limits, the municipal police department is to count the crime and arrest, if it is not being investigated by the campus police. Municipal police departments are to count arrests, explosions, explosive related offenses and their subsequent arrests if they are not being investigated by the WV State ~~Marshal's~~ Marshal's Office.

6.1.4 County law enforcement agencies and state police detachments are to count crimes and their subsequent arrests that happen in the county outside the limits of the municipalities. County law enforcement agencies and state police detachments are to count arsons, explosions, explosive related offenses and their subsequent arrests if they are not investigated by the WV State Fire ~~Marshal's~~ Marshal's Office.



COMBINED LOCAL AGENCY WARRANT SYSTEM

BECKLEY • CHARLESTON • PARKERSBURG • WEIRTON • FAIRMONT

July 7, 1997

Superintendent, c/o S. W. Cogar
725 Jefferson Road
South Charleston, WV 25309-1698

Gentlemen,

This letter constitutes comments on the proposed rule, Title 81, Series 11. We are including this letter and the attached document as our comments.

The Combined Local Agency Warrant System (C.L.A.W.S) is made up of law enforcement agencies throughout the State. C.L.A.W.S is operated by a board of directors made up of representatives of larger agencies that operate sophisticated computer hardware and software. Each of these agencies allows smaller agencies to tie into their systems and share their hardware and software.

The C.L.A.W.S. agencies are connected through a network that allows them to share various types of information including offense, arrest, accident, suspect and m.o. information. We also provide our agencies with the capability of computerized Uniform Crime Reporting.

Together we represent offense reporting for much of the population of the State. We hope that our comments will be seen as our expression of concern for a project that is plagued with problems but could be made to work with proper planning and funding.

Thank you for any consideration given to our comments.

Captain Rita Wilson
Charleston Police Dept.
CLAWS Board

Lieutenant William Kelly
Beckley Police Dept.
Chairman, CLAWS Board

Lieutenant David Dickens
Charleston Police Dept.
CLAWS Network Admin.

C.L.A.W.S. (Combined Local Agency Warrant System) COMMENTS ON:

**PROPOSED PROCEDURAL RULE, TITLE 81, SECTION 11
WEST VIRGINIA UNIFORM CRIME REPORTING PROGRAM; GENERAL
GUIDELINES AND REPORTING REQUIREMENTS**

Notice of a Comment Period

NOTICE NOT RECEIVED BY CHIEFS OF POLICE

We first learned about the proposed procedural rules and about the comment period, which ends on July 7, 1997 at 10:00 A.M., on June 26, 1997, during a meeting at the offices of the Criminal Justice and Highway Safety Division attended by Director James Albert, Norb Federspiel, Lieutenant William Kelly of the Beckley Police Department, Lieutenant David Dickens of the Charleston Police Department, and Sergeant Gayle Midkiff of the West Virginia State Police Uniform Crime Reporting Program. Sergeant Midkiff said that, while she knew that the C.L.A.W.S. (Combined Local Agency Warrant Systems) agencies would be interested in the proposed rules, she gave no instructions to the State Police legal section about distribution of the notice.

Since we were concerned about the short notice we contacted each of the C.L.A.W.S. agencies to determine whether or not any of us received timely notice of the proposed rules and the comment period. None of the Chiefs from any of the C.L.A.W.S. hub agencies (Charleston, Beckley, Fairmont, Weirton, Parkersburg, and node agencies such as Clarksburg) received notification.

This whole process should be slowed down. The comment period should be extended to allow the agencies affected by the proposed rule adequate time to comment. Extending the comment period would avoid the appearance of ambush and deception, would provide meaningful review and would allow all agencies to be a part of the process rather than just suffering the consequences.

Circumstances Requiring This Rule

UCR REDESIGN STEERING COMMITTEE

The steering committee had no voice in the decision to implement incident based reporting in West Virginia, did not develop the statewide reporting form and did not establish, nor were they given the opportunity to review or approve, the additional West Virginia-specific data elements.

The discussion at the first meeting on October 31, 1990 was, for the most part, limited to Sergeant Midkiff's announcement that all agencies in the state would be required to convert to incident based reporting and to use the new uniform reporting form when it was developed. The committee insisted that agencies which were capable of reporting electronically use any reporting forms they elected to use. While the current statewide incident report developed by the UCR section may well capture all the elements required for incident based reporting, it does a poor job of documenting an offense for criminal investigative purposes. In fact, many of the agencies represented on the committee subsequently chose

to develop their own forms because they found the statewide form to be cumbersome, confusing and ill-suited to the needs of law enforcement investigators or administrators.

At that first meeting, Sergeant Midkiff also stated that the State Police UCR Section planned to use only the data elements being used by the FBI. She mentioned that she wanted to add some additional data elements later.

There was a second meeting of the steering committee on December 7, 1990, during which the relative merits of various types of report forms were discussed. The meeting adjourned after the examination of forms used by other agencies across the country. Committee members left with the expectation that additional meetings would be held to allow the committee to review the form that was being developed by the State Police UCR Section. Those expectations were not met.

The committee did not meet again. The West Virginia Uniform Incident/Offense Report Form was developed with no further input or oversight from the steering committee.

The State Police UCR Section added 61 more data elements to the FBI's 52 NIBRS data elements, more than doubling the amount of data. The committee was **not** consulted on this change. This dramatic increase in the number of data elements West Virginia law enforcement agencies would be required to collect, report, enter, and store has increased the manhours needed to document investigations, as well as the manhours required for data entry at those agencies who have computerized their records. To the extent that the increased workload has resulted in overtime hours and increased hiring, this amounts to an unfunded mandate.

Circumstances Requiring This Rule INTERNAL STATISTICAL VALIDITY

For any statistical program to be useful, the statistics must have internal validity. Stated in simple terms, this means that when collecting data everyone must agree to call an apple an apple.

Some of the NIBRS data elements have not been defined by the FBI. While there are fairly comprehensive definitions of the various criminal offenses to be reported and short definitions for the types of property reported, there are no definitions of the values to be reported for several data elements, for example, the location of the offense, type of weapon, and type of injury. There are no written definitions and no plans to write any at a national level.

If variables have no established definitions and everyone collecting data uses his own definitions, then any statistics based on those variables have no internal validity, and any conclusions based on those statistics are suspect.

We question the wisdom of continued large expenditures of resources on a national, state, and local level to support a statistical program that does not begin to achieve internal validity on the data used.

Paragraph 9.1 on page 6 of the proposed procedural rule states "Data cannot be utilized unless it is accurate." We wholeheartedly agree and recommend that, since NIBRS in its current form is a fatally flawed program in that it lacks internal statistical validity, the attempt to convert to incident based reporting in West Virginia be substantially revised or abandoned.

In the event that the State Police choose to proceed with their proposed conversion to incident based reporting, we strongly recommend several changes in the program.

Circumstances Requiring This Rule

CONVERSION TO INCIDENT BASED REPORTING

The FBI envisions incident based reporting as allowing "common denominator links" among local agency computer systems rather than decentralized data collection for a centralized data repository.

The FBI Uniform Crime Reporting Handbook clearly states, "The implementation of NIBRS will be at a pace commensurate with the resources, abilities, and limitations of the contributing law enforcement agencies." Obviously this is not the case in West Virginia.

The handbook is adamant about its requirements for NIBRS participation. The FBI states that agencies wishing to participate should have computerized data systems and they are very clear that NIBRS should be a by-product of an **existing** automated law enforcement records system.

They further state that the state agency must have adequate field staff. With the State Police UCR staff consisting of a sergeant and an administrative assistant, it is clear that they do not meet this requirement.

The UCR staff apparently intends to abandon the summary based crime statistics. The introductory section to the proposed procedural rule states, "it is counterproductive to operate both the summary and incident based system. Also the state UCR program does not have the resources to maintain dual systems." We question the wisdom of totally abandoning summary based statistics.

Since there is no national requirement to do incident based reporting and since a number of states have elected not to convert to incident based reporting, the summary based uniform crime statistics are the only nationally accepted yardstick for measuring crime and crime trends. Grant applications of all types universally require summary based uniform crime statistics.

Just as NIBRS data should be a byproduct of automated records systems, the software used by the State Police should be able to compile summary based statistics as a byproduct of the incident based data.

NUMBER OF DATA ELEMENTS

Current summary based reporting consists of a count of seven specific types of crimes plus the number of persons arrested.

Incident based reporting consists of furnishing the FBI 52 data elements on 22 different crime categories classified by the FBI as Group A Offenses. The West Virginia UCR Section has added 61 extra data elements not required by the FBI.

All other crimes are classified as Group B Offenses and require a reduced data set of 13 data elements (13 of the 52 collected for Group A Offenses).

The primary reason for adding the sixty-one extra West Virginia data elements was to provide for crime analysis on a statewide basis, something computerized agencies already do on a local or regional basis. For crime analysis to be useful, the analyst must be familiar with both the geographical area, the demographics, and the recent and historical crime patterns for an area under study. It would be difficult, if not impossible, to perform such analysis on a statewide basis. Since crime analysis is used to shape a tactical response to problems, it must be performed in a timely manner, which would require an extremely large staff dedicated solely to that purpose.

The last paragraph of the section entitled "Circumstances Requiring This Rule" states that the State Police UCR program does not have the resources to operate both the summary based and incident based systems. Our assessment is that the State Police program does not have the resources to operate a crime analysis program. The extra sixty-one data elements added to facilitate statewide crime analysis are unnecessary for incident based reporting and place an unreasonable burden on local agencies to collect data the State Police UCR program is not in a position to use.

We maintain that requiring data collection for this attempt to perform crime analysis by the State Police UCR section exceeds the scope of their authority under Chapter 15, Article 2, Section 24 of the West Virginia State Code. The statute provides that "The bureau shall correlate the reports submitted to it and shall compile and submit to the governor and legislature semiannual reports based on such reports. A copy of such reports shall be furnished to all prosecuting attorneys and law enforcement agencies." Time sensitive crime analysis reports, as opposed to the more traditional statistical summaries and trend analysis, would be of little use for legislative and other governmental purposes.

**Page 3 of Proposed Procedural Rule
81-11-5. Information Collected. Paragraph 5.2**

Requires local agencies to report the additional detailed Group A offense data on several offenses which the FBI treats as Group B offenses, requiring arrestee data only on those offenses. Requiring additional data on these offenses for the West Virginia program would place an unreasonable and outrageous burden of extra and unnecessary data collection on local agencies.

The Group B offenses listed in paragraph 5.2 are bad checks, vagrancy, disorderly conduct, DUI, leaving the scene, hit and run, traffic accidents resulting in death, public intoxication, non-violent family offenses, liquor law violations, runaways, and trespassing.

Expanding the number of data elements required from 13 to 113 for these offenses would further short circuit police operations at every agency in West Virginia.

Pages 4 and 5 of Proposed Procedural Rule

81-11-8. Records Needed. Paragraph 8.1 and subparagraphs

This entire section exceeds the scope of the statute establishing uniform crime reporting. It is not within the authority of the Uniform Reporting Section to mandate what records a local or county agency is required to maintain beyond those necessary for accurate UCR reporting. It is certainly not within the purview of the UCR section to define what administrative records are maintained, nor should they concern themselves with such details as complaints filed or what they define as "other activities as considered necessary." This appears to authorize the UCR section to determine what is considered necessary for a local agency to maintain. This misuse of statutory authority is not acceptable.

Page 5 of Proposed Procedural Rule

81-11-8. Reporting Requirements Established. Paragraph 8.1.1

This paragraph is misleading. The current Summary Based Uniform Crime Reporting System requires that local agencies report only the number of arrests made for Part II offenses.

Page 5 of Proposed Procedural Rule

81-11-8. Reporting Requirements Established. Paragraph 8.2.5 and subparagraphs.

This paragraph states that the WVDPS UCR program will determine whether an agency reports on diskette or paper forms provided by or approved by the WVDPS UCR program. This is totally unacceptable. The decision to computerize record keeping must always be a local decision.

Requiring local agencies to computerize amounts to an unfunded mandate.

Additionally, there should be a third option for reporting: transferring electronic data by modem.

Page 7 of Proposed Procedural Rule

81-11-9. Certification and Approval. Paragraph 9.1.1.

This section requires submission of three months of data with 0% errors for certification. The FBI requires a 4% error rate.

APPENDIX B

FISCAL NOTE FOR PROPOSED RULE

The \$503,200 cost listed in Appendix B does not even begin to cover the cost associated with this project. It is obvious that little thought was given to the actual economic impact on local agencies.

Local agencies should not be expected to and cannot afford to maintain dual records systems. Therefore, in order to provide UCR reporting as a by-product of a police records system as defined by the FBI, consideration must be given to the costs associated with implementing a full records system. Using very conservative figures, we estimate the cost of bringing the additional 148 contributors mentioned in Appendix B to be as follows:

Hardware and software for full implementation	\$60,000 x 148	\$ 8,880,000
Adding one data entry clerk per agency	\$15,000 x 148	\$ 2,220,000
TOTAL FIRST YEAR COST		\$11,100,000

Additionally, recurring costs were not even addressed. Yearly costs are estimated as follows:

Hardware and software maintenance	\$ 2,000 x 148	\$ 296,000
Personnel costs (not including benefits)	\$15,000 x 148	\$2,200,000
TOTAL RECURRING YEARLY COST		\$2,296,000

Who is going to pay these costs? These costs far exceed the \$1,600 per agency that the UCR section claims. These costs represent the epitome of the unfunded mandate.

Please bear in mind that these figures are purposely conservative. They do not include the cost of training officers and data entry personnel. They do not address the costs involved in computerizing the large and medium sized agencies. They do not reflect the cost of quality control on both data collection and data entry.

Conclusions and Recommendations

The rush to implement incident based reporting began nearly seven years ago. During this process, West Virginia has somehow managed to put the cart before the horse. Before we can reap the rewards of NIBRS reporting, we must first pay the price of computerization. Local agencies must be given the opportunity to adequately develop computerized records management systems before NIBRS is implemented. Attempting to perform both transformations concurrently is placing an undue burden on local and county governments and law enforcement agencies. The FBI designed NIBRS to be a byproduct of existing records systems, and that is how it should be implemented in West Virginia. Forcing local agencies into premature and often ill-advised purchasing decisions just to comply with state-mandated UCR reporting will have long-lasting ramifications.

Since this transformation has already spanned the greater portion of the 1990's, delaying the process a little while longer in order to assess our progress, evaluate our options, get greater local law enforcement involvement and revamp the program would be time well spent. We recommend that the comment period be lengthened, the number of data elements be reduced to the FBI national data set, and that all the data elements be adequately defined to provide for statistical validity within West Virginia. As representatives of many of the major law enforcement agencies in West Virginia, we offer our assistance in implementing a workable solution to incident based reporting in West Virginia.

Response to comments provided by Combined Local Agency Warrant System (CLAWS) regarding Proposed Procedural Rule Title 81, Section 11, West Virginia Uniform Crime Reporting Program; General Guidelines and Reporting Requirements.

Notice of a Comment Period

NOTICE NOT RECEIVED BY CHIEFS OF POLICE:

The proposed procedural rules were legally filed and a standard comment period was established for the proposed rules. There was and is no attempt of "ambush and deception." It should be noted that procedural rules may be altered in the future as circumstances necessitate.

Circumstances Requiring This Rule

UCR REDESIGN STEERING COMMITTEE

CLAWS recounting of past events differ from my memory of the same events. October 31, 1990 was indeed the first meeting of the UCR Redesign Steering Committee. The newsletter dated October 10, 1990 announcing the date for the first steering committee meeting was part of a packet that included an agenda, the *Hate Crime Data Collection Guidelines*, a standardized incident form from Virginia and various other "material (that) relates to data elements." The newsletter also stated that "there (was) a sheet entitled *Types of Data Use Within the Criminal Justice Systems*. The areas in bold can be aided by the use of the incident based system, again demonstrating the importance of this program. Another sheet is labeled *Data Elements for Enhanced UCR Offenses*. These are the FBI data elements. They are our minimum requirements and will be covered during our first committee meeting. The sheets: *Washington State Incident-based Reporting: Finalized List of Data Elements*; *Additional Washington State Incident-Based Reporting Elements* and *Partial List of Additional Virginia State Incident-Based Reporting Data Elements* help describe how we may expand NIBRS into a customized system relevant to West Virginia." The newsletter also included the instructions to "study this material and be prepared to suggest what **additional data elements** will be useful to our system and why." This shows that the topics of additional data elements was presented at the very beginning of the redesign project. The meeting on December 7, 1990 was to discuss "the design of the standardized incident/offense form." A newsletter dated October 16, 1991 went out to all agencies, not just steering committee members. The newsletter was enclosed with the printer's draft of the West Virginia Standardized Incident/Offense form. The form was sent for critiquing purposes and agencies were asked for suggestions or criticisms concerning the report form. Agencies were also offered the opportunity to be represented on the UCR Redesign Steering committee held on November 13, 1993, even though they had not previously been a member. The November 13, 1991 meeting was devoted to the review of the incident/offense form. Agencies volunteered to pilot the form and a meeting was held of the pilot agencies following the testing period. Although the number of steering committee meetings were limited, they did continue past December 7, 1990. Communication was also not limited to just committee meetings. Correspondence was continual and agencies and individuals were always given the opportunity to comment and offer suggestions.

In actuality, 73 additional data elements were added. We beg to differ, that with the exception of the Law Enforcement Officer Killed and Assaulted (LEOKA), Hate Crime, West Virginia domestic violence information, agency UCR ID number and reporting officer ID, the additional data elements were in fact selected by the UCR Redesign Steering Committee.

The additional data elements were added at the end of existing FBI NIBRS segments. No additional segments or records were added to the format, nor was there any truncating or linking of segments. The only edit that was added was to identify domestic violence incidents. The other additional data fields can be left blank with no error generated.

Nine (9) elements were to collect domestic violence as required by §48-2A-9(d). Three (3) elements were for the FBI UCR LEOKA information and one (1) for the FBI UCR Hate Crime reporting. Without the addition of these data elements to the West Virginia layout, the reports would have to be submitted by paper and separate computer programs written and processed for these two FBI reports. Fifteen (15) were fields added for a variety of purposes; reporting agency UCR ID number, reporting officer ID, lighting, weather, location of entry, location of exit, security, tools used for entry, was evidence obtained, vehicle type, vehicle make/style, vehicle model, vehicle year, keys in vehicle and vehicle locked. Another fifteen (15) were suspect/offender descriptors; height, eye color, hair color, head hair, facial hair, glasses, handed, complexion/skin, build, teeth, tattoo, tattoo location, scars/marks, speech, offender unique ID (MO). These same 15 elements are found in three segments; offender segment, arrestee segment, arrestee segment for group B offenses. There were also alterations to some of the codes. Location codes added college/ university as a separate location and altered the relationship codes to mirror West Virginia family and household members definitions.

Many of the additional data elements reflect the same information collected by CLAWS to support its goal of sharing offense, arrest, suspect and MO information.

Circumstances Requiring the Rule INTERNAL STATISTICAL VALIDITY

The comment letter states that some of NIBRS data elements have not been defined by the FBI. The FBI provides two guide manuals describing the data elements as they are to be reported: *Uniform Crime Reporting Handbook, NIBRS Edition* and *Uniform Crime Reporting, National Incident Based Reporting System, Volume 1, Data Collection Guidelines*. It is true they did not detail all entries. Perhaps it was thought that entries such as bar/night clubs and service/gas station for location; poison, handgun and explosives for weapons and loss of teeth, apparent broken bones and unconsciousness were considered to be self-explanatory.

CLAWS expresses their opinion that NIBRS in its current form is fatally flawed, but we refer to an article in *The Police Chief*, November 1995. In his President's message, Chief David G. Walchak enumerated six urgent policy issues that needed to be addressed by the International Association of Chiefs of Police (IACP). The sixth issue was "leadership and support during the struggle to bring all law enforcement agencies on board with the new National Incident Based Reporting System (NIBRS)." The NIBRS he was addressing is NIBRS in its current form.

Circumstances Requiring This Rule CONVERSION TO INCIDENT BASED REPORTING

With the slow progress of the IBR conversion, beginning in 1990 and having a deadline for conversion set for January 1, 1999, it was thought that the eight and half year period would be sufficient for agencies to plan, prepare and provide for the conversion. Since the initiation of the redesign project, many agencies have indeed kept pace with the general trend of automating law enforcement agencies.

The comments are correct in stating that "agencies wishing to participate **should** have computerized data systems" and "that NIBRS should be a by-product of an existing automated law enforcement system." The FBI guidelines also state that "NIBRS data are designed to be generated as a by-product of local, state and Federal automated records systems. Thus, an agency can build its own system to suit its individual needs, including all the information required for administrative and operational purposes. Only the data required by NIBRS are then to be reported to the national UCR program." It is the intent that a single crime occurrence is entered only once into the computer. The agency collects information pertinent to its own uses and is able to filter off the NIBRS information, without requiring a separate entry of the occurrence just for NIBRS purposes.

The comments from CLAWS address the staffing of the state UCR program. The UCR staff is limited, but has been able to maintain routine summary functions in a timely manner, compile and publish the annual and semi-annual *Crime in West Virginia* report, work towards the implementation of the IBR system, conduct training sessions on NIBRS, instruct basic and cadet classes at the West Virginia State Police Academy and fulfill many other duties extremely well with only two persons. Conversion to IBR would mean our limited staff would be able to return to maintaining only one program and its applications. Then, we would be able to evaluate the need for additional staff, perhaps in the area of conducting field audits.

Agreed, there is no national requirements to do incident based reporting, just as there is no national requirement to do summary based reporting, yet the voluntary summary data contributed by law enforcement represents 95 percent of the total US population. Of course reporting is aided in many states by legislative mandates such as West Virginia code §15-2-24 (i) & (j). Yes, some states have elected not to convert to NIBRS, but according to the FBI publication *Crime in the United States 1995*, ten (10) states are NIBRS certified, twenty-two (22) states are in testing mode and eleven (11) other states, plus the District of Columbia and Guam are in various stages of planning and development. This means forty-three (43) states, plus DC and Guam have elected to convert to NIBRS. At the present time it is true the "summary based uniform crime statistics are (a) nationally accepted yardstick for measuring crimes and crime trends. The FBI even states that "*Crime in the United States* will continue to be published in its current format **until conversion** from the traditional summary UCR system to NIBRS is complete in most of the country."

CLAWS questions the wisdom of totally abandoning summary based statistics and is of the opinion that the software used by the State Police should be able to compile summary based statistics as a by-product of the incident based data. We totally agree, this is why the West Virginia IBR Repository software is capable of compiling summary based statistics from IBR data. The problem resides if both systems are maintained, then a plan must be devised to integrate two very different computer programs to compile understandable crime statistics for the state. Conversion to IBR makes only one program necessary to achieve two objectives.

NUMBER OF DATA ELEMENTS

The comment letter states that "WV has added 61 extra data elements not required by the FBI." As described earlier in this response, 73 data elements were added, but the FBI allows the UCR state programs to add to the 52 FBI data elements as long as the state system is capable to submitting to the FBI their 52 prescribed data elements.

The CLAWS comment letter states that the "primary reason for adding the additional elements was to provide crime analysis... that would require an extremely large staff dedicated solely to that purpose." We foresee responding to the **specific** requests of agencies and drawing up ad hoc reports by utilizing standard query language. This method of analysis is not as time consuming as devoting the mission of the program to analysis alone. We will be unable to determine staff needs for that purpose until an operable volume of data is compiled. That operable amount will not be a reality until the majority of agencies convert to IBR.

The comment letter also assumes that time sensitive crime analysis reports, as opposed to the more traditional statistical summaries and trend analysis, would be of little use for legislative and other governmental purposes. The UCR office receives many requests for information that cannot be provided using the traditional statistical summaries. During the past legislative session, requests were made for data on child abuse, juvenile offenders, juvenile victim, hate crime and elderly victims; none of which was available with our current summary system, but would have been if we could have utilized the IBR system. Such information could prove to be invaluable in making or supporting legislative decisions, plus provide an unprecedented capability to address criminal justice issues in great detail.

Page 3 of Proposed Procedural Rules 81-11-5. Information Collected. Paragraph 5.2

The comments regarding paragraph 5.2 indicate a need to clarify the statement. If agencies are contributing by form submission, the offense data will be necessary so manual entry of the report can be made by the UCR staff into the repository system. The following revisions will be made.

5.2 With the conversion to the Incident Based Reporting (IBR) System, individual offense data will also be reported on bribery, counterfeiting/forgery, destruction of property, embezzlement, extortion/blackmail, fraud, gambling, kidnapping, pornography, prostitution, sexual assault, sexual abuse, incest, stolen property, weapon law violation and hate crimes, bad

checks, vagrancy, disorderly conduct, DUI, leaving the scene, hit and run, traffic accidents resulting in death, public intoxication, non-violent family offenses, liquor law violations, runaways, trespassing and hate crimes.

5.2.1 If an agency contributes by form submission, individual offense data on the following offenses will also be reported: bad checks, vagrancy, disorderly conduct, DUI, leaving the scene, hit and run, traffic accidents resulting in death, public intoxication, non-violent family offenses, liquor law violations, runaways, trespassing and all other criminal offenses.

5.2.2 If an agency contributed by disk submission, Group B arrestee data will be reported on the following offenses: bad checks, vagrancy, disorderly conduct, DUI, leaving the scene, hit and run, traffic accidents resulting in death, public intoxication, non-violent family offenses, liquor law violation, runaways, trespassing and all other offenses.

81-11-8. Records Need. Paragraph 8.1 and subparagraphs

The comment letter actually refers to 81-11-7, paragraph 7 and subparagraphs. The procedural rules do not mandate what records a local or county agency is required to maintain. The paragraph suggests that "basic records **should** include." The records listed is an abbreviated version of the records suggested by the FBI in their *Uniform Crime Reporting Handbook* for accurate UCR reporting. Since as defined in *Crime in the United States*, the Uniform Crime Reporting Program is a nationwide cooperative statistical effort of over 16,000 city, county and state law enforcement agencies voluntarily reporting data on **crimes brought to their attention**, reports of the investigation of each complaint received are needed for UCR reporting. To clarify that this pertains to criminal occurrences, the following changes will be made:

7.1(2) Control for recording and counting every criminal complaint received.

7.1(3) Reports of the investigation of each criminal complaint received.

81-11-8 Reporting Requirements Established. Paragraph 8.1.1

The following revisions have been made to clarify reporting requirements for Part II Offenses.

8.1(1) Any law enforcement agency, discovering, receiving a report investigating any offense occurring in its jurisdiction that would constitute a crime as defined by the FBI's *Uniform Crime Reporting Handbook* as a Part I ~~or Part II~~ offense shall report the facts to the West Virginia UCR program monthly.

8.1(2) Any law enforcement agency making an arrest for any offense occurring in its jurisdiction that would constitute a crime as defined by the FBI's Uniform Crime Reporting Handbook as a Part II offense shall report the facts to the West Virginia UCR program monthly.

~~8.1(2)~~ 8.1.3 Any law enforcement agency arresting, citing or issuing a summons to any person (including the handling of a juvenile) for any crime which occurred in its jurisdiction shall

report these facts to the West Virginia UCR program monthly.

~~8.1(3)~~ 8.1(4) Any law enforcement agency which receives a report of an alleged incident of family or household abuse shall report the information mandated by §48-2A-9(d) to the West Virginia UCR program monthly.

~~8.1(4)~~ 8.1(5) These reports shall be made on the forms provided by or approved by the West Virginia UCR program.

~~8.1(5)~~ 8.1(6) The completed report is due by the 7th of the month following the reporting period.

81-11-8 Reporting Requirements Established. Paragraph 8.25 and subparagraphs

When determining the form an agency submits its report the volume of data generated by that agency must be taken into account. The West Virginia state UCR program does not have the staff to do manual data entry for a moderate size agency and should not have to do so when the agency is already or planning to become, automated and enters, or plans to enter, cases into their automated record keeping system. Again, UCR should only receive the NIBRS by-product of that recordkeeping system. The agency's resources must also be taken into consideration. The following revisions will be made:

8.2.5 These reports will be submitted by one of two methods. The West Virginia UCR program will determine a contributor's method of submission based on agency's volume of activity, a review of the contributing agency's resources and the West Virginia UCR program's available resources. These methods are:

- 8.2.5.1 Diskette
- Disk Size - - - - 3.5
- Code Set - - - - ASCII

Although funding is not provided for the conversion, many agencies are finding the need to keep pace with today's technological and informational needs is also an unfunded mandate, but a necessary one for the operation of an effective law enforcement department.

Presently, only two methods of submission, diskette and form, are available. Modem transmission is indeed a future option, but only after being thoroughly explored and only when security becomes assured. When modem submission becomes a viable option, the procedural rule will be revised.

8-11-9 Certification and approval

The FBI only sets certification for the state programs. This certification consists of a 4% or less error rate, statistical reasonableness, updating capability and responsiveness, and system appropriateness. The 0% error rate for three (3) successive months standard for local agencies was derived after conferring with other state programs on their standards and attending the

Association of State UCR Programs (ASUCRP) annual conference training sessions on certification processes.

APPENDIX B FISCAL NOTE FOR PROPOSED RULE

The cost listed in Appendix B did not consider the cost of complete automation for any agency, including items such as dispatch, multiple workstations or MDTs, as not all those items are specific for IBR conversion.

Also, many agencies are already or are planning for, a modicum or more of automation and don't need to purchase hardware exclusively for IBR participation. The WV state UCR program is proposing procedural rules so that planned automation conforms with WV IBR and NIBRS specifications.

The estimated costs were computed primarily considering the small agencies which may need a much lesser degree of automation. The \$3,400 per agency was estimated for a PC standalone and an IBR compliant software license. The costs did not take in account the cost of data entry personnel, because it was assumed that entry of the case reports was an essential recordkeeping function of an agency and since NIBRS is to be a by-product of the agency's recordkeeping software, separate and distinct entry for NIBRS would not be needed. But, it is recognized that with the implementation of IBR, the entry process would become more detailed and more time consuming.

The fiscal note for the proposed rules did not take into account the cost of training. But, the West Virginia UCR program does offer training on the West Virginia Incident/Offense Report form and plans to offer practical IBR training with additional newsletters and the formation of the WV IBR Users Group.

Conclusions and Recommendations

To reiterate, it was thought that seven years was sufficient "opportunity to adequately develop computerized records management systems." Plus, placing a deadline date of January 1, 1999 gives an agency an additional 15 months from present to thoroughly consider their options, so not to force an agency into "premature and often ill-advised purchasing decisions." The WV State UCR program is of the opinion that the development of computerized records management system should not be **before** NIBRS implementation, but **simultaneous** with NIBRS implementation.

The comments supplied by CLAWS emphasizes the need to clarify guidelines, the need to establish procedural rules and the need to form a WV IBR Users Group. With the interest, experience and knowledge demonstrated by CLAWS, we are hopeful they will take a prominent leadership role in the WV IBR Users Group.

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TITLE 81
PROCEDURAL RULE
WEST VIRGINIA STATE POLICE

SERIES 11
WEST VIRGINIA UNIFORM CRIME REPORTING PROGRAM;
GUIDELINES AND REPORTING REQUIREMENTS.

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

§81-11-1. General.

1.1 Scope - This procedural rule explains the intent of the West Virginia Uniform Crime Reporting Program and the reporting requirements of the contributing law enforcement agencies.

1.2 Authority - *W. Va. Code* §15-2-24 (i) and (j) and §48-2A-9(d).

1.3 Filing Date - July 30, 1997

1.4 Effective Date - September 2, 1997

§81-11-2. Definitions.

As used in this rule, unless in a context that clearly requires a different meaning, the term:

2.1 Approved -- software that meets the specifications listed in the FBI's *Uniform Crime Reporting National Incident-Based Reporting Systems*, Volumes: 1 - *Data Collection Guidelines*, 2 - *Data Submission Specifications*, 4 - *Error Message Manual*, and the specifications listed in the West Virginia NIBRS implementation data fields and the West Virginia file document layout. For a vendors' software to be approved, the software must produce zero percent errors when utilizing test data. Another method of a vendor achieving approval status is when a UCR contributing agency employing the software becomes certified.

2.2 Certified -- a contributing agency that is submitting IBR data on computer disk whose data complies with the specifications listed in the FBI's *Uniform Crime Reporting National Incident-Based Reporting Systems*, Volumes: 1 - *Data Collection Guidelines*, 2 - *Data Submission Specifications*, 4 - *Error Message Manual*, and the specifications listed in the West Virginia NIBRS implementation data fields and the West Virginia file document layout. The agency must submit 3 months in succession of actual crime incident data with zero percent errors to achieve certification.

2.3 Contributing Agency -- a West Virginia law enforcement agency that has been assigned an Originating Identifier (ORI) by the Federal Bureau of Investigation (FBI) and is mandated by §15-2-24 (i) and (j) to submit uniform crime reports in the form, content, time and manner prescribed by the Criminal Identification Bureau of the West Virginia State Police.

2.4 Incident Based Reporting (IBR) -- an enhanced crime reporting system in which law enforcement agencies collect detailed data regarding individual crime incidents and arrests and submits them in separate "reports". In West Virginia the prescribed data elements and data values utilize the NIBRS standards, plus other elements and values qualified in the West Virginia NIBRS implementation data fields and the West Virginia file document layout. These West Virginia fields and values also include the information required for collection by the WV Family Violence Prevention Act §48-2A-9.

2.5 National Incident Based Reporting System (NIBRS) -- the IBR system developed for reporting crime figures to the FBI. Prescribed data elements and data values to describe each incident and arrest are to be found in the publications, *Uniform Crime Reporting National Incident-Based Reporting Systems* (Volumes 1, 2 and 4).

2.6 Summary Based Reporting -- the traditional system of crime reporting where law enforcement agencies tally the number of occurrences of Part I Offenses as well as arrest data for both Part I and Part II offenses and submit aggregate counts of the collected data in monthly summarized reports indirectly to the FBI through the State UCR Program. The guidelines for summary reporting are found in the FBI publication *Uniform Crime Reporting Handbook*.

2.7 Uniform Crime Reporting (UCR) -- is a city, county and state law enforcement program which provides a nationwide view of crime based on submission of statistics by law enforcement agencies throughout the country. The crime data is submitted to the State UCR program which forwards the data to the national UCR program which is administered by the Federal Bureau of Investigation (FBI). The authorization for the state UCR program in West Virginia is found in §15-2-24 (i) and (j).

§81-11-3. Purposes.

3.1 The quantitative statistical data derived from the Uniform Crime Reporting (UCR) program will provide assistance in determining the overall scope of the reported criminal activity in West Virginia and will aid in making effective management studies and criminal analysis possible.

3.2 To prescribe the forms, general content, time and manner of submission of the Uniform Crime Reports as mandated in §15-2-24(i).

§81-11-4. Objectives.

4.1 Collect from all state law enforcement agencies, crime data as defined by state statute and by national Uniform Crime Reporting definitions.

4.2 Assure accuracy in the data collected by developing and adhering to submission standards.

4.3 Enhance the effectiveness and usefulness of the data provided by converting from the summary based method of reporting to incident base reporting as recommended and endorsed by International Association of Chiefs of Police, the National Sheriff's Association, the FBI and the national Association of State UCR Programs.

4.4 Provide law enforcement administrators with crime statistics for administrative and operational use.

4.5 Determine the occurrence of crime, victims of crime and the offenders within the state and their characteristics in order to find the proper focus for crime prevention and enforcement.

4.6 Inform the Governor, Legislature and other governmental officials and the public as to the nature of the crime problem in West Virginia, its magnitude and its trends.

§81-11-5. Information Collected.

5.1 UCR contributors are to report the individual offense data known to them in the following crime categories: murder, manslaughter, rape, robbery, felonious assault/malicious wounding, burglary, breaking and entering, breaking without entering, petit and grand larceny, motor vehicle theft, joyriding, arson, misdemeanor assault and/or battery, controlled substance violations and domestic violence violations.

5.2 With the conversion to the Incident Based Reporting (IBR) System, individual offense data will also be reported on bribery, counterfeiting/forgery, destruction of property, embezzlement, extortion/blackmail, fraud, gambling, kidnapping, pornography, prostitution, sexual assault, sexual abuse, incest, stolen property, weapons law violations, and hate crimes.

5.2.1 If an agency contributes by form submission, individual offense data on the following offenses will also be reported: bad checks, vagrancy, disorderly conduct, DUI, leaving the scene, hit and run, traffic accidents resulting in death, public intoxication, non-violent family offenses, liquor law violations, runaways, trespassing, and all other criminal offenses.

5.2.2 If an agency contributed by disk submission, Group B arrestee data will be reported on the following offenses: bad checks, vagrancy, disorderly conduct, DUI, leaving the scene, hit and run, traffic accidents resulting in death, public intoxication, non-violent family offenses, liquor law violations, runaways, trespassing, and all other criminal offenses.

5.3 Additional offense information concerning victims, property, suspects/offenders, homicide and/or aggravated assault circumstances, circumstances in which an officer(s) is killed or assaulted is to be submitted. Additional reports on persons arrested are to be submitted to provide information concerning the age, sex, race, residency and personal description of all persons arrested.

5.4 This information is specified by the Federal Bureau of Investigation's (FBI) *Uniform Crime Reporting National Incident-Based Reporting Systems*, Volumes: 1 - *Data Collection Guidelines*, 2 - *Data Submission Specifications*, 4 - *Error Message Manual*, and the West Virginia NIBRS implementation data fields and the West Virginia file document layout.

5.5 Annually, numerical data on sworn and non-sworn employees is also to be collected from each participating law enforcement agency.

§81-11-6. Jurisdictional Reporting.

6.1 The purpose of jurisdictional guidelines for reporting crime statistics is to accurately depict the nature and volume of crime for a particular community or jurisdiction, not to claim or take "credit" for the number of investigations, arrests, etc. Throughout West Virginia there are several hundred law enforcement agencies, some of which have overlapping jurisdictions. To be certain that a crime is not counted more than once by overlapping jurisdictions, the following guidelines are to be adopted:

6.1.1. Arsons, explosions, and explosive related offenses investigated by the WV State Fire Marshal's office and their subsequent arrests are to be counted by the State Fire Marshal's office.

6.1.2. Those campus police agencies that possess an ORI and are identified as a UCR contributing agency count crimes and their subsequent arrests that occur on college/university property. Campus police are to count arsons, explosions, and explosive related offenses and their subsequent arrests, if they are not investigated by the WV State Fire Marshal's office.

6.1.3. Municipal police departments count crimes and their subsequent arrests that occur within the city limits. If a crime occurs on college/university property which lies within the city limits, the municipal police department is to count the crime and arrest, if it is not being investigated by the campus police. Municipal police departments are to count arsons, explosions, explosive related offenses and their subsequent arrests if they are not being investigated by the WV State Fire Marshal's office.

6.1.4. County law enforcement agencies and state police detachments are to count crimes and their subsequent arrests that happen in the county outside the limits of the municipalities. County law enforcement agencies and state police detachments are to count arsons, explosions, explosive related offenses and their subsequent arrests if they are not being investigated by the WV State Fire Marshal's office.

6.1.5. A crime that occurs in one jurisdiction should not be counted by another campus police department, municipality, sheriff's department, state police detachment or state fire marshal's investigator, even though more than one agency participated in the investigation or arrest of the subject of that crime.

§81-11-7. Records Needed.

7.1 Data needed for UCR reporting are readily available through a good recordkeeping system. Basic records should include:

7.1.1. Permanent records of crime, traffic, administrative matters and such other activities as considered necessary.

7.1.2. Control for recording and counting every criminal complaint received.

7.1.3. Reports of the investigation of each criminal complaint received.

7.1.4. Information on persons arrested, charges made, disposition and other facts about the arrested person, including age, sex, race, residence and physical descriptors.

§81-11-8. Reporting Requirements Established.

8.1 The UCR program is currently operating under the Summary Based reporting system. The minimum reporting requirements established for the Summary Based UCR system are:

8.1.1. Any law enforcement agency, discovering, receiving a report or investigating any offense occurring in its jurisdiction that would constitute a crime as defined by the FBI's *Uniform Crime Reporting Handbook* as a Part I offense, shall report the facts to the West Virginia UCR program monthly.

8.1.2. Any law enforcement agency making an arrest for any offense occurring in its jurisdiction that would constitute a crime as defined by the FBI's *Uniform Crime Reporting Handbook* as a Part II offense shall report the facts to the West Virginia UCR program monthly.

8.1.3. Any law enforcement agency arresting, citing, or issuing a summons to any person (including the handling of a juvenile) for any crime which occurred in its jurisdiction shall report these facts to the West Virginia UCR program monthly.

8.1.4. Any law enforcement agency which receives a report of an alleged incident of family or household abuse shall report the information mandated by §48-2A-9(d) to the West Virginia UCR program monthly.

8.1.5. These reports shall be made on the forms provided by or approved by the West Virginia UCR Program.

8.1.6. The completed report is due by the 7th of the month following the end of the reporting period.

8.2 The UCR reporting system is undergoing a conversion to an enhanced reporting system, Incident Base Reporting (IBR), which is designed to more effectively meet current and future information needs as it pertains to crime reporting. As of January 1, 1999 all agencies are to have made the conversion to IBR and begun the certification process.

The minimum reporting requirements established for incident based reporting are:

8.2.1. Any law enforcement agency discovering, receiving a report of or investigating any offense occurring in its jurisdiction that would constitute a crime as defined by the FBI's Uniform Crime Reporting, National Incident-Based Reporting System, Volume 1 - Data Collection Guidelines as a Group A or Group B offense shall report these facts to the West Virginia UCR program monthly.

8.2.2. Any law enforcement agency arresting, citing or issuing a summons to any person (including the handling of a juvenile) for any crime which occurred in its jurisdiction shall report these facts to the West Virginia UCR program monthly.

8.2.3. Any law enforcement agency who receives a report of an alleged incident of family or household abuse shall report the information mandated in §48-2A-9(d) to the West Virginia program monthly.

8.2.4. Any law enforcement agency discovering, receiving a report of or investigating any offense that manifest evidence or prejudice based on race, religion, sexual orientation, ethnicity, disability, political affiliation or sex shall report these facts to the West Virginia UCR program monthly.

8.2.5. These reports will be submitted by one of two methods. The West Virginia UCR program will determine a contributor's method of submission based on an agency's volume of activity, a review of the contributing agency's resources, and the West Virginia UCR program's available resources. These methods are:

8.2.5.1. Diskette
Disk Size - - - 3.5
Code Set - - - ASCII

8.2.5.1.1 The data elements must comply with the specifications qualified in the FBI's publications Uniform Crime Reporting - National Incident-Based Reporting System Volume 1 - Data Collection Guidelines, Volume 2 - Data Submission Standards, Volume 4 - Error Message Manual and the West Virginia NIBRS implementation data fields.

8.2.5.1.2. The data file format must comply with the specifications qualified in the FBI publication Uniform Crime Reporting National Incident Based Reporting System, Volume 2 - Data Submission Standards and the West Virginia file document layout.

8.2.5.1.3. The disks must be on high or double density and used exclusively for submitting UCR reports.

8.2.5.2. Form Submission - Reports shall be made on the forms provided by or approved by the West Virginia UCR program. Only copies of the reports are to be submitted to the West Virginia UCR program, the originals of the reports are to remain on file at the contributing agency.

8.2.5.3. The complete reports, whether submitted by disk or on forms are due by the 7th of the month following the end of the reporting period.

§81-11-9. Certification and Approval.

9.1 Data cannot be utilized unless it is accurate. To ensure accuracy, a contributing agency that submits by diskette will undergo the certification process.

9.1.1. A contributing agency will be considered IBR certified once it has submitted three (3) months of data in succession with 0% errors.

9.1.2. A software vendor can achieve approval status by submitting test data (provided by the State UCR program) to the West Virginia UCR program with 0% errors or if a UCR contributing agency utilizing their software receives certification.

9.2 An agency may lose certification or a vendor may lose approval status if an agency's monthly submission has greater than 4% errors.

§81-11-10. Supplies and Services offered to UCR contributors

Obtainable by writing, telephoning or faxing the UCR office at:

West Virginia State Police
725 Jefferson Road
South Charleston WV 25309

Phone: 304-746-2159/2237
Fax: 304-746-2402

- 10.1 Summary based reporting forms (until Jan. 1, 1999).
- 10.2 Summary based tally books and tally sheets (until Jan. 1, 1999).
- 10.3 Prepaid envelopes.
- 10.4 IBR incident/offense forms.

- 10.5 IBR incident/offense form guide manual.
- 10.6 Conversion tables (converts West Virginia criminal code to the appropriate UCR summary based and NIBRS codes).
- 10.7 WV NIBRS Implementation Data Fields and File Document Layouts.
- 10.8 IBR test data.
- 10.9 FBI Publications:
 - 10.9.1 Uniform Crime Reporting, National Incident-Based Reporting System, Volume 1: Data Collection Guidelines.
 - 10.9.2 Uniform Crime Reporting, National Incident-Based Reporting System, Volume 2: Data Submission Specifications.
 - 10.9.3 Uniform Crime Reporting, National Incident-Based Reporting System, Volume 3: Approaches to Implementing an Incident-Based Reporting IBR System.
 - 10.9.4 Uniform Crime Reporting, National Incident-Based Reporting System, Volume 4: Error Message Manual.
 - 10.9.5 Uniform Crime Reporting Handbook (until Jan. 1, 1999).
 - 10.9.6 Hate Crime Data Collection Guidelines.
 - 10.9.7 Training Guide for Hate Crime Data Collection.
- 10.10 Provide one-on-one training in the UCR office on proper UCR submission, upon request.
- 10.11 Provide regional training on proper UCR submission, upon request.

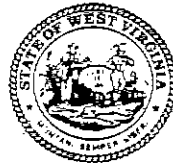
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(Plus all the volunteer
help we can get)

TO: STEVE W COGAR

AGENCY: STATE POLICE

FROM: JUDY COOPER, DIRECTOR, ADMINISTRATIVE LAW DIVISION

DATE: September 5, 1997

THE ATTACHED RULE FILED BY YOUR AGENCY HAS BEEN ENTERED INTO OUR COMPUTER SYSTEM. PLEASE REVIEW, PROOF AND RETURN IT WITH ANY CORRECTIONS. IF THERE ARE NO CORRECTIONS, PLEASE SIGN THIS MEMO AND RETURN IT TO THIS OFFICE. YOU WILL BE SENT A FINAL VERSION OF THE RULE FOR YOUR RECORDS.

PLEASE RETURN EITHER THE CORRECTED RULE OR THIS FORM WITHIN TEN (10) WORKING DAYS OF THE DATE YOU RECEIVED THIS REQUEST. CALL IF YOU HAVE ANY QUESTIONS.

SERIES: 11 TITLE: 81 STATE POLICE

* THE ATTACHED RULE HAS BEEN REVIEWED AND IS CORRECT.

SIGNED: *Sabrina Jeff Medley*
TITLE OF PERSON SIGNING: Sgt. / UCR officer
DATE: 09-15-97

* THE ATTACHED RULE HAS BEEN REVIEWED AND NEEDS CORRECTING. THE CORRECTIONS HAVE BEEN MARKED.

SIGNED: _____
TITLE OF PERSON SIGNING: _____
DATE: _____

NOTE: IF YOU ARE NOT THE PERSON WHO HANDLES THIS RULE, PLEASE FORWARD TO THE CORRECT PERSON.