



3/30/2013

Dr. Arati Prabhakar
Director
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue
Washington, D.C. 20504

Re: Request for Information (RFI) Criminal Justice Statistics; Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety

Dear Dr. Prabhakar:

We would like to thank the Office of Science and Technology Policy for the opportunity to provide information regarding criminal justice data, specifically related to policing in America. The National Alliance on Mental Illness (NAMI) is the nation's largest grassroots mental health organization dedicated to building better lives for the millions of people affected by mental illness. We do this by providing education, support, public awareness and advocacy in communities across the country. We appreciate that you are evaluating current data collection, use, and data transparency practices with respect to law enforcement activities. We hope our response to this request for information will help the administration with its goal of enhancing public trust and safety by building effective and accountable policing in America.

Need for Better Data on Law Enforcement Interactions with People with Mental Health Conditions (Background)

People with mental health and substance use disorders are over-represented in America's criminal justice system. Pervasive gaps in local mental health systems mean that when people are in crisis, law enforcement — not a mental health professional — is often the only response available. Through our nationwide network, we hear countless stories of individuals and families who have encountered law enforcement during a mental health crisis, often with traumatic results. While it is generally accepted that a disproportionate amount of law enforcement interactions involves people with mental health conditions, there is a lack of data to uniformly quantify the situation.

With many state and local governments working to expand crisis response services in conjunction with the new 988 Suicide and Crisis Lifeline, better data is critical to understanding interactions between law enforcement and people with mental illness. This information will help communities as they make decisions about public safety and the most appropriate ways to respond to people experiencing a mental health crisis.

Current National Data Collection Is Limited (RFI-1 & 3)

Currently there are few sources of publicly available data that includes information about police interactions with people with mental illness. Many of the national data resources that are easily accessible and available to the public include the [Washington Posts Police Shootings Database](#), and the [Mapping Police Violence website](#). These sources include data on mental health status; however, the data is limited to information about deadly police encounters and do not include information about non-deadly use of force. Additionally, some non-profits, such as the Treatment Advocacy Center, have attempted to bridge the gap by creating [databases](#) that capture injuries and deaths associated with interactions between police and people with mental illness. However, none of these databases display a comprehensive picture of law enforcement interactions with people with mental illness.

Two federal databases, the National Incident Based Reporting System (NIBRS), and the FBI's National Use of Force Data Collection, both include information on mental illness. However, NIBRS only includes this information related to arrests or crimes and does not capture interactions that may not result in an arrest. The National Use of Force Data Collection could provide a wealth of information about interactions between law enforcement and people with mental illness; however, the response rate to that collection has never reached a level in which the FBI will release information that includes questions on mental illness.

This lack of comprehensive and available data illustrates the significant need for federal leadership to expand data collection with respect to law enforcement activities.

Current Local Data Collection and Use (RFI-1 & 3)

Data collected at the local and state level regarding police interactions with people with mental illness is inconsistent, and in many cases not easily available to the public. In the vast majority of communities, indicating whether an interaction involved someone with a mental illness in a report is dependent on the software used by the agency. Furthermore, at the 911 level, many cities include calls for service involving a mental health crisis in categories that also include domestic violence cases or public disturbances.

What does lead to better data collection are local initiatives to address the overincarceration of people with mental illness, or to improve law enforcement response to people in crisis. The data is often collected and analyzed to set a baseline for the community initiative, and to measure any progress towards its goal. Unfortunately, the collection and analysis are often narrow and very specific. Furthermore, the data often looks at systems level impact and rarely provides much detail about outcomes for the individual. Evaluating the impact and outcomes of the community members served by these systems and initiatives is equally as important to evaluating the impact to the system itself. We see a great need to provide additional support and resources to communities to use police data to evaluate the impact of policies and reforms on individuals.

Existing Collaboration and How the Federal Governments Can Help (RFI-4; Use of Data-13)

Many communities have engaged in initiatives that look to improve or reduce law enforcements' interactions with people who have mental illness. Programs such as the Police Mental Health Collaboration Program, the Stepping Up Initiative, and the Memphis Model of Crisis Intervention Team (CIT) Programs, all engage in data collection to better understand and improve their work to ensure people with mental illness are getting access to the mental health system.

A key component to the success of these initiatives at the local level is that they 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. Many of our NAMI affiliates have relationships in both law enforcement and academia and are able to leverage these relationships to support data collection and evaluation of their local reform efforts.

A challenge and barrier to ongoing work is incentives for sustained collaboration. Given that this work is often not funded, once priorities shift or budgets reduced, regular meetings and collaboration often fall by the wayside. To encourage better ongoing collaboration and data collection, we encourage OSTP to use its leadership role within the Federal Government to 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.

Sharing Criminal Justice Data to Impact Advocacy (Data Transparency-21)

Data is a key component of NAMI's advocacy with federal, state and local policy leaders. Our alliance leverages this information to identify needs and support requests for resources or policy changes. The challenge of incorporating this information is often having accurate and accessible research and data. NAMI grassroots advocates are people directly impacted by public policymaking and care about issues in their communities but are often not experts in policy. Having easily understandable and accessible tool kits, reports and other data can help advocates educate and inform policymakers. Unfortunately, this information is either not available or not provided in an accessible format. By producing easily understandable reports for the public, the National Institute of Justice and the Bureau of Justice Statistics can make data analysis more accessible for grassroots advocates to share with their local policy makers to support effective policy change.

Thank you for the opportunity to comment on this important issue. Law enforcement data is not only critical to improving the law enforcement profession but can also provide insight and support to building the resources that meet the needs of our communities. If you have any questions or would like to discuss further, please contact Shannon Scully, Director of Justice Policy & Initiatives at sscully@nami.org.

Sincerely,



Hannah Wesolowski
Chief Advocacy Officer
National Alliance on Mental Illness