

Framework for a Data-Driven Crime Prevention Prosecutor's Office

Background

The National Network for Safe Communities, a project of John Jay College of Criminal Justice, was launched in 2009 under the direction of David M. Kennedy and John Jay College President Jeremy Travis. The National Network focuses on supporting cities implementing proven strategic interventions to reduce violence and improve public safety, minimize arrest and incarceration, strengthen communities, and improve relationships between law enforcement and the communities it serves. The National Network is committed to building a community of practice that operates along a set of guiding principles:

First do no harm. Criminal justice is strong medicine: it can help, but applied too heavily or in the wrong way, it can hurt. It's now clear that too much incarceration; aggressive, disrespectful policing; and other missteps can damage individuals, families, and communities and undermine relationships between neighborhoods and law enforcement. Law enforcement should do its work in ways that do not cause that harm.

Strengthen communities' capacity to prevent violence. Community norms and actions – not law enforcement – do most of the work of crime control. Community members can establish expectations for nonviolence and intervene directly with the few people at the highest risk. Direct communication through “call-ins,” “custom notifications,” and other practical steps can focus and amplify community crime control. Using this approach strengthens neighborhoods and keeps people out of jail.

Enhance legitimacy. Most people obey the law because it's the right thing to do, not because they're afraid of being arrested. Even criminals follow the law most of the time. Communities need to see law enforcement, especially the police, as fair, respectful, and on their side. Police should conduct themselves in ways that model their caring and respect for the communities they serve. Where legitimacy goes up, crime goes down.

Offer help to those who want it. Many of the people at highest risk don't like how they're living and want a way out. Communities should meet them where they are and do everything possible to support them.

Get deterrence right. When law enforcement needs to act, it's usually best to let someone know that enforcement is coming, so they can step aside, rather than to arrest, prosecute, and incarcerate. The creative use of existing law, combined with direct communication with high-risk people, can make deterrence work and head off both violence and actual enforcement.

Use enforcement strategically. When arrest, prosecution, and incarceration are necessary, law enforcement should use them as sparingly and tactically as possible. Profligate enforcement can have terrible collateral consequences, alienate communities, and

undermine legitimacy. Law enforcement should apply the minimum that is compatible with ensuring public safety.

These principles have informed a variety of evidence-based interventions, of which the Group Violence Intervention (GVI) is the most seasoned. First implemented in Boston as “Operation Ceasefire,” the GVI produces rapid and substantial reductions in homicide and serious violence in America’s most troubled communities by communicating directly with street groups. A long and growing record of impact makes it the most powerful response developed to date to address this core problem.¹ This work is spreading nationally and many of the cities that have seen historic violence reduction over the past few years—including Chicago, New Orleans, Oakland, and Stockton, CA—are using this strategy or its basic framework. Cities such as Detroit, Philadelphia, and Kansas City have begun to use the GVI with promising results; Baltimore launched this past year; the state of Connecticut is supporting the approach in New Haven, Bridgeport, and Hartford; and smaller cities like Peoria, Chattanooga, and South Bend have begun, as well.²

This framework has now also been tested successfully in addressing overt drug markets through the Drug Market Intervention³; individual violent offenders through “Chicago PSN”⁴; and a host of other problem areas, such as robbery, domestic violence, and prison violence. The National Network has recently seen indications from prosecutor’s offices nationally that they are open to contributing to violence prevention and reduction goals in accord with the principles that underlie these strategies. Movement in this direction holds great potential to contribute to rapid and dramatic declines in violence, reduction in arrest and incarceration, improved law enforcement legitimacy, and strengthened relationships between the criminal justice system and minority communities.

Executive summary

The National Network has typically designed the law enforcement component of its violence intervention strategies through partnership with police departments. However, it is entirely possible to imagine a prosecutor’s office organized to conduct its work consistent with goals of violence reduction, reducing unintended harm, enhancing procedural justice, and strengthening relationships between law enforcement and minority communities. This paper outlines a basic direction and design for a fundamental reconception of the function and office of the prosecutor.

For all practical purposes, prosecutors nationally have functioned largely as a passive element in the broader criminal justice system: they have taken cases provided to them by the police, made charging and plea decisions within a relatively narrow statutory and discretionary framework, and handed defendants over to the courts and corrections. Marginal innovations, such as geographically focused or “community” prosecution and add-ons such as reentry programs, have not fundamentally altered this profile. For the most part,

¹ Braga, A. A., & Weisburd, D. L. (2012). *The Effects of “Pulling Levers” Focused Deterrence Strategies on Crime*. Campbell Systematic Reviews.

² Kennedy, David M. (2014, January 21). The Story Behind the Nation’s Falling Body Count. *The Huffington Post*. http://www.huffingtonpost.com/david-m-kennedy/the-story-behind-the-nation_b_4634755.html.

³ Braga & Weisburd, *The Effects of “Pulling Levers.”*

⁴ Papachristos, A. V., & Fagan, J. (2007 July). Attention Felons: Evaluating Project Safe Neighborhoods in Chicago. *Journal of Empirical Legal Studies*, 4(2), 223–272.

prosecutors have not taken independent responsibility for addressing core serious crime problems; held themselves accountable for on-the-ground performance in key areas such as crime reduction and recidivism; produced their own crime prevention and control strategies; conducted their own crime analysis; or considered their role in addressing key issues such as community concerns about intrusive and illegitimate criminal justice practices and the damaging community impact of concentrated arrest, prosecution, and incarceration.

The National Network now envisions a prosecutor's office that breaks this mold and establishes itself as not only an important partner to other criminal justice agencies but an independent and effective strategic actor in reducing crime, enhancing the legitimacy of the criminal justice system, strengthening the capacity of communities to prevent and reduce crime, and reducing the unintended consequences of existing criminal justice practices. Such a prosecutor's office would include the following core elements:

- An explicit commitment to independently producing crime reduction;
- An explicit commitment to reducing community harms from the criminal justice process;
- A set of core strategies designed to address a set of particularly important crime and public safety issues;
- The internal strategic and managerial capacity to design and implement those strategies;
- The data and analytic base necessary to design, implement, and assess those strategies.
- Within those strategies, elements designed to minimize arrest and prosecution by mobilizing direct communication with high-risk groups and individuals; mobilizing community informal social control; enhancing the legitimacy of the prosecutor's office and the criminal justice system; employing deterrence before actual enforcement; and where enforcement is required, applying the minimal level requisite;
- Working partnerships with those necessary to implement these approaches: police and other criminal justice agencies; communities and key actors within communities; social service providers; outreach workers; and academics.

This document sketches this new conception of the function and office of the prosecutor and touches on each of these core elements. It is intended to stimulate consideration of that overall direction and how each of the core elements could be realized.

The new prosecutor's office

Over twenty years ago, the New York Police Department took itself by the scruff of the neck and determined to become a relentlessly, independently effective crime-prevention organization. It did not remove itself from the rest of the criminal justice system, but it consciously undertook to have impact without worrying overmuch about the behavior, or lack thereof, of other criminal justice agencies. Commissioner William Bratton publicly set numerical crime reduction targets. Explicit strategies for particularly important public safety problems such as gun violence were developed and published. NYPD management and data systems were overhauled. Perhaps most important, a powerful new culture of impact and accountability was inculcated – one that has now endured multiple shifts in commissioners and mayors. The NYPD's capsule summary of its new ethos – “we're not just report takers, we're the police” – became a rallying cry.

The results are history. New York has produced the longest and most sustained crime decline in the nation's history. There is broad agreement that NYPD's practices had a substantial part in producing that decline. A data-driven focus on high-payoff criminogenic problems like violent drug gangs and open drug markets meant that these crime declines were accomplished with substantial reductions in felony arrests and prison and jail populations. New York is a fundamentally different city as a result. US policing is fundamentally changed as a result: it believes it can reduce crime, it is doing so in cities across America, and NYPD innovations like CompStat are now nearly professional standards. What was once a standard set of police explanation of their failure to reduce crime – that's a social problem, we're doing our job but the prosecutor and the judges aren't backing us up – are no longer heard, or allowed, in good departments. (Even serious flaws and excesses in policing New York, such as excessive stop and frisk, have been driven by a bedrock commitment to crime reduction. That commitment is at root commendable, even though – as this paper will address – other, sometimes competing commitments are also important.) Because of the NYPD's leadership and example, police departments now know that they can prevent crime and expect themselves, and are expected, to do so.

No other part of the criminal justice system has made the transition that policing has. Local and federal prosecutors, the bench, community corrections, and institutional corrections are largely operating as they always have. In particular, local prosecutors primarily manage their inbox of cases presented by the police. Prosecutorial strategies for crime prevention largely mean marginal shifts within existing law and discretion, such as office guidelines that shape charging and pleas for certain crimes, or focusing prosecutions on certain problems or areas, such as gang crime or drug markets. Alternatives to such practices, such as reentry initiatives, are also typically marginal. In general, offices have no independent capacity to collect or analyze crime data. Office management tends to be directed to managing caseflows. Offices often do not even ask, much less assess, what impact they are having on crime. Success on widely accepted metrics, such as conviction rates, can in fact signal overly cautious and self-serving internal standards and procedures.

At the same time, prosecutors have been an active, if generally unselfconscious, element in producing America's historically unprecedented increase in the prison population. That increase has led to the current prison population of over two million people behind bars and a 70 percent rate of imprisonment for black men who fail to finish high school. These realities are especially concentrated within poor black communities. A large body of research shows that such concentration hurts individuals, families, and neighborhoods. Collateral consequences include permanent income declines; disruption family, marriage, cohabitation, and child-rearing; intergenerational harms such as increased school failure and likelihood of imprisonment; and overall damage to community collective efficacy.⁵

A particularly important element in that picture is that perceptions of unfair, unsupportive, and badly motivated criminal justice undermine community perceptions of the *legitimacy* of the criminal justice system. Where perceived legitimacy is low, community norms against crime are undermined. compliance with the law declines; cooperation with authorities decreases; and crime increases. In police leadership nationally, there is now an active

⁵ Tyler, T. R., Fagan, J., & Geller, A. (2014). Street stops and police legitimacy: Teachable moments in young urban men's legal socialization. *Yale Law School, Public Law Working Paper (302), Yale Law & Economics Research Paper (476), Columbia Public Law Research Paper (14-380)*.

engagement with the idea of legitimacy – how to stop damaging it and how to enhance it. Prosecutors have been essentially absent from that conversation.

It is time for prosecutors to take the step that police departments began to take twenty years ago and invent the crime-focused, data-driven, independently effective prosecutor's office. This reimagined office should be informed by past missteps in order to minimize the unintended community harms of existing criminal justice practices.

Core statement of values and impact, internally and externally

The prosecutor should communicate unmistakably, both inside the office and to the public, what their goals and expectations are. These goals should include the following commitments:

- Effect concrete crime reductions
- Minimize the use of the criminal sanction to the extent compatible with public safety
- Rebuild legitimacy and relationships with the jurisdiction's highest-crime neighborhoods.

Set of explicit strategies for particularly important public safety issues

The office should select and prepare formal office strategies for a limited initial set of priority crime problems. These may include the following:

- Homicide
- Gun violence (most homicides are gun homicides, but there are typically around five nonfatal shootings for every fatality)
- Disorderly drug markets, both on the street and indoors (the latter particularly with respect to public housing units)
- Robbery
- Domestic violence

Many of these issues have greatly improved in the recent past, but they remain the significant crime problems in most cities. Public violence associated with guns and drug markets persists in highly visible neighborhood "hot spots." Robbery is perceived as a deep and central threat to communities' sense of safety. Such violence is likely to be the metric on which the prosecutor is most immediately judged. Especially during political shifts, public attention is drawn to serious violence. These are also areas in which proved strategies can be mapped onto the prosecutor's office and in which the office can exercise new leadership (as discussed below).

The most serious domestic violence is concentrated amongst poor women of color and in poor neighborhoods. Their vulnerability and the community, family, and intergenerational impact of domestic violence should make this a priority.

Operational strategic orientation: hot groups, hot people, and hot places

A growing body of criminological evidence shows that serious violence is dramatically concentrated among remarkably small numbers of "hot people" and "hot places." Hot people are so hot that, when their offending is removed from the neighborhood they live in, that neighborhood often ceases to be dangerous. These communities are not dangerous; *they* are. Hot places are likewise remarkably few and encompass startlingly large proportions of communities' crime. These concentrations of offending create high-payoff opportunities for prevention, community action, and enforcement. Those opportunities, in turn, provide a

different framing for organizing the work of the office (“this gang,” “this person,” “this block,” and “this building” rather than “this case”). Focusing on relatively small numbers of people and places also provides an alternative to the one-size-fits-all enforcement that drives high levels of incarceration and, in turn, the legitimacy crisis.

A workable breakdown of “hot people” is:

- **Gangs, crews, and other violent groups.** City-level analysis shows that homicide and gun violence is overwhelmingly driven by serious offenders who operate in groups. Audits that identify all such groups typically find that their entire collective membership adds up to under 0.5 percent of the city’s population but is associated with half to three-quarters of all homicides.
- **“Impact players.”** Within such groups, a relatively small number of individuals drive the action. “Impact players” are typically 10 to 20 percent of the overall group population.
- **Prior offenders.** The best predictor of offending is past offending. Those with prior gun offenses, for example, are at greatly elevated risk of future gun offending; those with prior robbery offenses are at greatly elevated risk for future robberies.
- **Those closely associated with victims.** Individuals with close criminal and social connections to, for example, homicide victims can be as much as 900 percent more likely to be killed than others, even those in the same general criminal network.⁶ These connections and networks can be identified from existing criminal justice data (for example, arrested-with and stopped-with databases).
- **Recidivist domestic violence offenders with otherwise robust criminal histories.** Not all serious recidivist domestic violence offenders also have histories as chronic non-domestic offenders, but research indicates that a large proportion do, and that they tend to be in intimate relationships with the most vulnerable domestic violence victims. The most vulnerable women in a city’s most troubled neighborhoods face a special risk from such offenders.

Research on hot spots likewise shows that crime is remarkably concentrated in “micro” places: not the usual conception of “dangerous neighborhoods,” but in a very small number of very concentrated places – particular blocks, corners, and buildings – within those neighborhoods. These micro places are remarkably stable over time: they persist as hot spots over periods of years. For example, research in Seattle found that half of all crime in the city took place on only 4.5 percent of street segments (blocks). Not surprisingly, these places are often situated within gang turf, drug markets, or public housing areas. Their small number, concentration, and persistence offer important opportunities for intervention.

Prosecutor-led interventions

Effective operational interventions have been demonstrated for hot groups, hot individuals, and hot places. Nationally, police departments have nearly always initiated and managed such interventions. **Yet the prosecutor is well-positioned to take a leadership role in these types of interventions and advance the state of the art, and should do so.**

⁶ Papachristos, A. V., & Wildeman, C. (2014, January). Network Exposure and Homicide Victimization in an African American Community,” *American Journal of Public Health*, 104(1), 143-150. <http://ajph.aphapublications.org/doi/abs/10.2105/AJPH.2013.301441?journalCode=ajph>

The basic frame of hot people interventions has been to identify the hot groups and hot individuals; put them on notice that they have been so identified; communicate to them that their communities need their violence to stop; offer them various kinds of help and support; and put them on prior notice that further offending will result in a certain and higher-level criminal justice response. The “Operation Ceasefire” gang violence intervention does this with violent groups. The “Chicago PSN” gun violence intervention focuses on prior gun offenders (and was, in fact, initiated under the auspices of a US Attorney). NYPD’s “Juvenile Robbery Intervention Program” (JRIP) addresses recidivist juvenile robbers. The High Point “Drug Market Intervention” (DMI) shuts down overt drug markets by intervening simultaneously with all low-level drug dealers in particular market areas. A recent domestic violence intervention creates escalating attention to recidivist domestic violence offenders. This family of interventions has the strongest record of any approach to serious violent crime: Ceasefire, for example, cut gang homicide in New Orleans by half last year; Chicago PSN cut neighborhood homicide by almost 40 percent, and overall recidivism by felons with gun priors by 30 percent; NYPD’s figures show JRIP reduces robbery by over 80 percent.

In only a handful of instances nationally have prosecutors taken the lead in such work. Yet the prosecutor is in many ways powerfully situated to organize and lead such efforts. To take one example, the people most likely to commit gun violence are those who have prior gun charges. The prosecutor could review their criminal records; prepare an analysis of their criminal exposure for a subsequent gun charge; and organize the office to give such a charge maximal attention. The prosecutor could then seek them out in the community or address them when they pass through the office on other charges, give them and their families notice of their criminal exposure, and offer both help and support, mobilizing social service and outreach partners.

Similarly, were the prosecutor’s office to track violence by gangs and crews, it could systematically identify the most violent of those groups; work with its internal investigators and external partners to focus investigative attention on those groups; and formally communicate to less violent groups that this is the office policy. The latter could be done as a routine part of office business – group members are arrested so often that an internal tracking mechanism could flag them for briefings and updates as they pass through during routine processing.

Many of the same type of interventions could be applied to hot places. Once they are identified, the office will have the option to take special measures with respect to the offenders operating in them and organizing broader problem-solving efforts. One method of particular interest is the use of “third party” interventions (as they are known in policing). This method takes measures to motivate figures such as landlords, business owners, and even high-level offenders to reduce crime in the zones they can influence. The prosecutor could readily mobilize outreach, technical assistance, criminal prosecution, civil action, asset forfeiture, and the like to promote compliance by such actors.

All of these approaches share important characteristics. They seek to proceed against important crime problems in ways that are transparent; to focus on small numbers of key people, not whole communities or classes of people; to treat offenders with respect and give them the information they need to stay out of trouble; to mobilize informal social control by involving the people closest to them and influential community figures; to facilitate focused outreach and support; to use deterrence rather than enforcement; and to make actual enforcement a last resort. Together these characteristics have potential to bring fewer

people into the criminal justice net, and engage with communities and offenders in ways that strengthen community efficacy and law enforcement legitimacy.

Cross-functional Division of Crime Prevention Strategy and Operations

The foregoing suggests ways the prosecutor's office could implement proved approaches. In practice, such approaches would have to be carefully designed, implemented, and their impact assessed by the office. To this end the prosecutor's office should create a new cross-functional division, reporting directly to them, to take the lead in this area. This division would have the following responsibilities:

- Collecting and analyzing the data necessary to understand crime in the jurisdiction; informing the design of crime prevention strategies; tracking and managing implementation; and assessing impact.
- Designing office strategies for particular crime problems. The division should include personnel knowledgeable about the rapidly developing frameworks for applied crime control and draw on the knowledge of outside specialists. These frameworks include focused deterrence, hot spots, group and network dynamics, repeat offending, repeat victimization, situational crime prevention, routine activities theory, and crime prevention through environmental design.
- Coordinating the implementation of strategies across the prosecutor's functional divisions. However the prosecutor chooses to organize the new office, strategies are likely to require careful integration across divisions. A strategy that seeks to impose a high price on gangs for gun violence, for example, may draw on gang, gun, narcotics, and misdemeanor enforcement, depending on the vulnerabilities of individual gang members. Program coordinators will need to manage the overall strategy and integrate the office's individual contributing elements.
- Mobilizing and coordinating outside partners. The suggested strategies generally draw heavily on other criminal justice agencies; community figures; and social service providers. The office should have a centralized point for outreach to and coordination of such partners, in addition to contacts and work that will go on at lower levels in the office.
- Designing methods for strategic communication with offenders and other parties. Many of the suggested strategies have a key component of direct communication with offenders and those influential with offenders. For example, the prosecutor's office may put gun offenders on notice that their next gun case will get dramatically heightened attention through arrangement with their probation and parole officers, direct personal contact in the community, notice to a family member, or when a non-gun case brings them into the office. This strategic communication is central to the strategies' effectiveness, and particular approaches can cut across strategies. Designing, testing, promulgating, and refining them should be a priority for the office.
- Process and impact assessment. The division should monitor both the progress and integrity of the implementation of particular strategies, and provide impact evaluations.

Procedural justice and legitimacy

Long-standing practice within the criminal justice system has contributed to public perceptions of unfair, unsupportive, and badly motivated law enforcement. This is especially true in minority communities that have been subject to the most damaging effects of the prison boom. The proposed approach to prosecution holds great potential to improve procedural justice. Procedural justice focuses on the way legal authorities interact with the

public, and how the characteristics of those interactions shape the public's views of authorities, their willingness to obey the law, and actual crime rates. Mounting evidence shows that community perceptions of procedural justice can have a significant impact on public safety.

Procedural justice is based on four central principles: "treating people with dignity and respect, giving citizens 'voice' during encounters, being neutral in decision making, and conveying trustworthy motives."⁷ By prioritizing these principles in its routine interactions with the public, and especially in its communications with high-risk members of gangs and groups, the prosecutor's office can contribute to strengthened relationships between authorities and the community, through which 1) the community has trust and confidence in authorities as honest, unbiased, benevolent, and lawful; 2) the community feels obligated to follow the law and the dictates of legal authorities; and 3) the community feels that it shares a common set of interests and values with law enforcement.⁸

Procedurally just prosecution is essential to the development of good will between law enforcement and communities and is closely linked to improving community perceptions of law enforcement legitimacy, the belief that authorities have the right to dictate proper behavior. Research shows that when communities view the criminal justice system as legitimate, they are more likely to cooperate with law enforcement and obey the law.⁹ Establishing and maintaining legitimacy promotes the acceptance of criminal justice decisions, correlates with high levels of law abidingness, and makes it more likely that communities will collaborate with the prosecutor's office and other law enforcement representatives to combat crime.

Just as the police department has everyday encounters with the public, prosecutorial staff also has repeated contacts with defendants, and informing them along the principles of procedural justice can have a positive impact on the relationship between law enforcement and communities. The National Network has worked with Chicago Police Department to craft a day-long in-service training for line officers and command staff that teaches them how to apply powerful procedural justice principles in their day-to-day contacts with the public. A similar training could be designed for the staff of the prosecutor's office to great effect. In fact, some community courts that emphasize procedural justice have seen significant reductions in recidivism by defendants.¹⁰

The federal government has recently endorsed this agenda as a central component of the Justice Department's National Initiative for Building Community Trust and Justice.¹¹ In particular, the initiative calls for mapping the principles of procedural justice onto not only

⁷ Mazerolle, L., Bennett, S., Davis, J., Sargeant, E., & Manning, M. (2013). *Legitimacy in Policing: A Systematic Review*. Oslo, Norway: Campbell Systematic Reviews.

⁸ Tyler, T. R., & Jackson, J. (2013). *Popular Legitimacy and the Exercise of Legal Authority: Motivating Compliance, Cooperation and Engagement*. Forthcoming in *Psychology, Public Policy and Law*.

⁹ Tyler, T. R. (2006). *Why People Obey the Law*. Princeton, NJ: Princeton University Press.

¹⁰ Lee, C. G., et al. *A Community Court Grows in Brooklyn: A Comprehensive Evaluation of the Red Hook Community Justice Center: Final Report*, 122.
<http://www.courtinnovation.org/research/community-court-grows-brooklyn-comprehensive-evaluation-red-hook-community-justice-center-f>

¹¹ Office of Justice Programs. *National Initiative for Building Community Trust and Justice*.
<http://ojp.gov/communitytrust.htm>

the police department but all arms of the criminal justice system, with special attention to individuals at highest risk of violent victimization or offending, as well as other vulnerable populations with which prosecutors maintain routine contact, such as youth, victims of violent crime, victims of sexual assault, and the LGBTQI community.

Data needs

The prosecutor's office will need the data infrastructure required to support its new strategic orientation and will need to design this for its own purposes. Timely, accurate, and appropriate data will be essential to creating an independent understanding of the jurisdiction's crime issues; designing operational strategies; tracking strategies' implementation; assessing their impact; and reporting to the public and partner agencies. Getting this right will be one of the most important inputs into the new office's effectiveness.

Some of these data may be available from other agencies and acquired through data-sharing agreements. Others will need to be created by the office itself. Even prior to data availability or the prospect for acquisition and sharing at this stage, the office will need to create the capacity to track at least the following:

- Incident-level crime information
- Offender-level crime information
- Victim-level crime information
- Address-level crime incident locations (required for refined micro-level hot spot analysis)
- Gang, groups, and crews: members, rivalries, alliances, key offending information
- Gun offending and victimization, aggregated and tracked at the group level
- "Impact players" within groups
- Non-group involved dangerous violent offenders
- Known robbery offenders
- Dangerous domestic violence offenders
- Office contact with all the above across all dimensions of the office's work: arraignment, prosecution, notification, and any elements of specific office crime control strategies
- Arrested-with, stopped-with, investigated-with, and other data supporting individual-level social network analysis
- Recidivism
- Community perceptions of law enforcement legitimacy, and the legitimacy of the office specifically

A strong model for much of the above is the Arrest Alert System and related information and mapping systems developed by the Crime Strategies Unit of the Manhattan Prosecutor's Office in New York City. Interested prosecutor's offices should take a close look at the Manhattan CSU for inspiration and possible replication.

The office will need a high-level, professional, and dedicated staff to design these and other data collection systems; conduct analysis; and support the office's high-level and line operational elements.