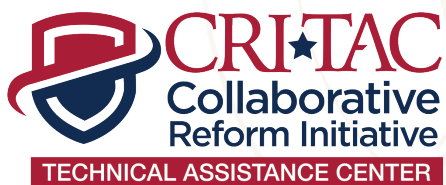


Collaborative Reform Initiative Continuum of Technical Assistance

STRATEGIC FRAMEWORK



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CRITICAL RESPONSE

**Organizational
Assessment**



COPS
Community Oriented Policing Services
U.S. Department of Justice

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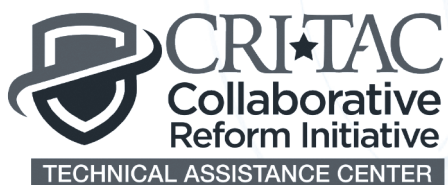
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Introduction

The U.S. Department of Justice (DOJ) is committed to ensuring that law enforcement agencies across the nation provide all people with fair, equitable, and effective public safety services. To that end, the Office of Community Oriented Policing Services (COPS Office) offers the Collaborative Reform Initiative (CRI) Continuum of Technical Assistance Services to assist law enforcement agencies and the communities they serve in identifying and implementing organizational improvements and reforms through training, consultation, peer-based learning, analysis, and in-depth independent assessments. The CRI encompasses three complementary programs that, for the first time in history, are now available concurrently to law enforcement agencies nationwide.

Background

In 2011, the COPS Office established Collaborative Reform, a program designed to help state and local law enforcement address issues that undermine public trust. The main objective of Collaborative Reform was to provide a cost-effective, proactive, nonadversarial vehicle for the DOJ and local agencies to work together to ensure fair, impartial, and effective policing for all communities. This reform model offered an alternative to more adversarial litigation and enforcement actions.

In addition to Collaborative Reform, the COPS Office offered limited assessments of key processes and procedures, after-action reviews, and rapid technical assistance (TA) such as peer exchanges through the Critical Response program. That program operated in parallel with Collaborative Reform and was designed to provide targeted TA to law enforcement agencies dealing with high profile events, major incidents, or sensitive issues of varying need.

In 2017, at the direction of DOJ leadership, the COPS Office ended the Collaborative Reform and Critical Response programs. At the same time, the COPS Office established a new TA center, the Collaborative Reform Initiative Technical Assistance Center (CRI-TAC), supported by national law enforcement management and labor stakeholder groups and designed to provide small-scale, agency-driven TA. CRI-TAC is not designed to engage in resource intensive, independent, and transparent organizational reform processes that some law enforcement agencies and communities desire.

In 2022, the COPS Office re-established the services of the original Collaborative Reform and Critical Response programs and entered into cooperative agreements with service providers to continue this work while continuing to sustain TA supported through the CRI-TAC. With this new framework, the COPS Office offers a comprehensive continuum of services to law enforcement agencies nationwide—all under the banner of the COPS Office's flagship TA program, the Collaborative Reform Initiative.



Purpose of this publication

This publication provides a strategic framework for the management, administration, and operations of the COPS Office Collaborative Reform Initiative, which comprises CRI-TAC, the Critical Response program, and the Organizational Assessment program (successor of Collaborative Reform circa 2011). The sections that follow describe the goals and overarching strategy for providing law enforcement agencies and the communities they serve with a comprehensive suite of options for organizational improvement and reform. Operating principles, approaches, and methods of program performance measurement are summarized in each program description.

Strategy Overview

The COPS Office CRI is structured as a continuum of services offered to law enforcement agencies on a strictly voluntary basis. Three complementary programs offer four tiers of service that range in level of effort and complexity. These services are designed to build trust between law enforcement agencies and the communities they serve; improve fairness, effectiveness, and efficiency in agency operations; enhance officer safety and wellness; build agencies' capacity for organizational learning and self-improvement; and widely share evidence-based, promising, and innovative community policing practices (see CRI goals in figure 1).

Figure 1. CRI goals

Goal 1.	Goal 2.	Goal 3.	Goal 4.	Goal 5.
Build trust between police and the communities they serve	Improve fairness, effectiveness, and efficiency in agency operations	Enhance officer safety and wellness	Build agencies' capacity for organizational learning and self-improvement	Promote community policing practices nationwide

CRI-TAC offers training and TA on a request-and-deliver basis through a consortium of law enforcement stakeholder associations, subject matter experts (SME), and training providers. These engagements are narrowly scoped and conducted at the pace of the requesting agency. TA offered through this program is considered tier 1 and tier 2 in the continuum of services.

The **Critical Response** program offers an intermediate form of TA that includes issue-specific reviews or targeted assistance in the wake of a critical incident. Critical Response efforts are tier 3. In contrast to the Organizational Assessment program, this program does not involve ongoing implementation and long-term TA.

The **Organizational Assessment (OA)** program offers more intensive TA, involving in-depth assessments and TA on systemic issues that challenge community trust and confidence. These engagements are the most comprehensive and are classified as tier 4.

Each of the three programs contributes to the prescribed goals by assisting participating law enforcement agencies in making small- and large-scale improvements and reforms on a proactive, collaborative, and voluntary basis.

Examples of TA, per program and tier, are provided in table 1 on page 4.

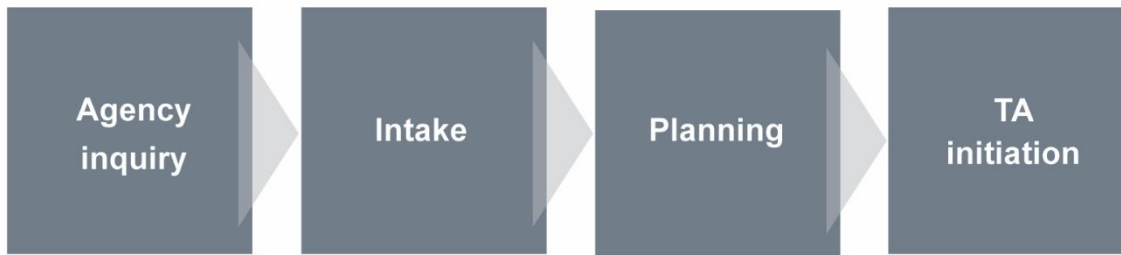
Table 1. Continuum of Services examples

Collaborative Reform Initiative Continuum of Services		
Program	Tier	TA examples
Technical Assistance Center (CRI-TAC)	1	<ul style="list-style-type: none"> • Training • Executive consultation • Peer exchange • Resource referral
	2	<ul style="list-style-type: none"> • Policy review • Strategic planning • Needs assessment (e.g., training, technology, recruitment)
Critical Response	3	<ul style="list-style-type: none"> • Immediate delivery of TA • Critical incident after-action review • Issue-specific review of operations
Organizational Assessment	4	<ul style="list-style-type: none"> • Comprehensive organizational assessment with ongoing TA and public reporting

Common approach for onboarding agencies

CRI is a finite public resource, and law enforcement leaders requesting services under this initiative must be ready, willing, and able to engage fully and establish it as a priority in their agency. Law enforcement agencies requesting participation in any of the three programs constituting the CRI will be guided through a standard approach for onboarding that enables the agency, the COPS Office, designated TA providers, and other relevant stakeholders to achieve a shared understanding of the program, its parameters, and mutual expectations for all involved parties. Figure 2 on page 5 illustrates this common approach. Depending upon the nature and scope of the request for assistance, the phases illustrated in figure 2 may vary in complexity and duration.

Figure 2. CRI intake overview



Agency inquiry

Law enforcement agencies interested in TA services may submit an initial inquiry to the COPS Office. The inquiry may be made directly to the COPS Office or through an intermediary such as another DOJ component, a U.S. Attorney’s Office, or the COPS Office’s designated TA provider. However, all TA through the CRI must ultimately be requested voluntarily by the law enforcement executive.

Intake

The purpose of the intake process is to ensure that the requesting agency, the TA provider(s), and the COPS Office reach consensus on the type of TA being requested, the most appropriate program to meet that agency’s needs, and the mutual expectations among all involved parties. When the agency completes intake, it may submit a formal TA request for the agreed-upon best-fit program.

Planning

The planning phase of onboarding entails the production of a detailed work plan including timelines, resources (e.g., staffing and budget), information and data needs, and the approach for conducting TA.

TA initiation

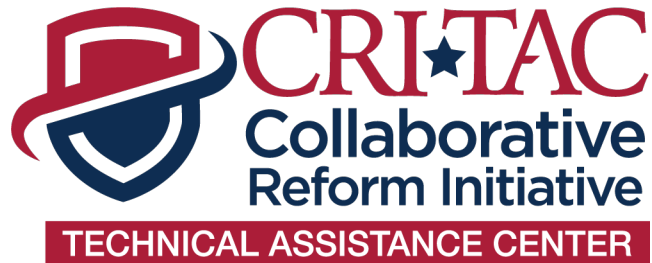
The initiation of TA marks the completion of agency onboarding and the beginning of all work prescribed within the parameters of the specific program.

CRI program coordination

CRI operates within a broader ecosystem of DOJ resources designed to help law enforcement agencies and the communities they serve to achieve public safety goals while using strategies and tactics that are constitutional and represent the best available evidence, innovation, and standards of practice. Regular coordination and collaboration within the COPS Office, as well as other DOJ components—primarily the Civil Rights Division (CRT), Office of Justice Programs (OJP), and Community Relations Services (CRS)—mitigates potential conflicting or duplicative efforts. To this end, COPS Office leadership and senior staff participate in the following activities:

- As needed, CRI program managers convene staff, TA providers, and SMEs from multiple programs to coordinate, deconflict, and ensure the efficient provision of TA to participating law enforcement agencies.
- COPS Office staff members participate in the Civil Rights Coordination Meeting, which includes component representatives from across the department.
- The COPS Office chairs the TA working group, with federal program managers from TA programs across the COPS Office, Bureau of Justice Assistance (BJA), CRS, and Office of Violence Against Women (OVW). This meeting can accommodate newly established law enforcement TA programs as necessary.
- COPS Office and CRT staff members coordinate one-on-one for TA requests involving law enforcement agencies under active consent decrees. In addition, requests from jurisdictions recently encountering high-profile incidents are routinely shared with CRT for situational awareness.

CRI-TAC



The COPS Office and its partners provide support, resources, and TA to law enforcement agencies nationwide through CRI-TAC. Customized solutions are designed by SMEs from the field and in collaboration with participating agencies to address agencies' unique needs. The program brings together the collective leadership, expertise, and

resources from law enforcement stakeholder organizations to ensure it is meeting the field's complex and varying needs.

The range of resources provided includes training, remote and on-site consultations, peer exchanges, resource referrals, and policy assistance among other types of TA. The TA covers more than 60 distinct community policing, crime prevention and response, and law enforcement management topics.

Operating principles

In 2017, through a competitive process, the COPS Office selected the International Association of Chiefs of Police (IACP) to spearhead this national law enforcement TA center. The IACP is supported by a broader coalition of law enforcement stakeholder associations, ensuring that the program is "by the field, for the field." Likewise, the CRI-TAC process puts agencies in the driver's seat, providing agencies with opportunities for review and approval of work plans that scope the engagement and deliverables, which are provided solely to the agency. CRI-TAC's operating principles are built into every facet of the program as designed by the COPS Office (see figure 3 on page 8).

Figure 3. CRI-TAC operating principles

By the field, for the field	With partners from major law enforcement stakeholder associations, the program is designed to be "by the field, for the field." TA reflects a peer-based learning approach to organizational improvement. Subject matter experts are provided by IACP and partners.
Agency- driven	Participating agencies are in the driver's seat throughout the process, including the TA request, work plan, and types of TA activities that SMEs may engage in.
Narrowly scoped	CRI-TAC offers a wide array of discrete, focused training and TA. The engagements are typically no longer than 6 months in duration.

Approach

CRI-TAC offers a broad range of technical assistance services (see figure 4 on page 9). The type(s) of TA delivered are selected in consultation with the agency, accounting for the agency's needs and availability of resources. Notably, an agency may receive one or more of these services throughout a TA engagement.

In addition to receiving training and consultation on a topic or topics of their choice, participating agencies may request a formal product as part of their TA engagement. There are two types of outputs CRI-TAC produces for participating agencies: (1) informational briefings and (2) agency deliverables. Generally, these products are developed by the SMEs assigned to the site in collaboration with IACP and the COPS Office.

- **Informational briefings** are formal presentations to the agency describing the TA delivered, guidance and considerations, and general conclusions.
- **Agency deliverables** are documents intended to provide guidance and considerations that represent CRI-TAC SMEs' expert opinion of the agency's operations and informed by best and promising practices, research literature, practitioner experience, and tailored innovations for the agency.

Figure 4. Types of TA offered via CRI-TAC

Resource referral

Provide requestor with guides, documentation, toolkits, reports, and other relevant publications on selected topics.

Web-based training

Provide pre-recorded webinars, live online training, and virtual informational briefings.

In-person training

Deliver live direct training or train-the-trainer courses, customized for the need of the agency.

Remote coaching and consultation

SME review of policies and practices and follow-up remote consultation.

Peer exchange

Facilitate peer-to-peer exchanges with leading experts to share information and promising practices in person or via telephone, videoconference, and web-based meeting spaces.

Meeting facilitation

Support meetings among agency personnel and/or other public and private sector stakeholders.

On-site consultation

Collaborate with agency leadership and other law enforcement personnel to provide guidance on promising/emerging practices to deliver tailored solutions.

Policy assistance

SMEs assist in reviewing current policies or developing new ones, in collaboration with the agency.

Evaluation

CRI-TAC continually assesses client satisfaction and self-reported impact on participating agencies through three primary data collections:

1. **Training evaluations** are distributed to all training participants. These evaluations allow trainees to rate the training on a variety of dimensions including general satisfaction with the content and instructors and self-reported knowledge, skills, and abilities gained as a result of the training.
2. **Client satisfaction surveys** are distributed to all primary agencies that have completed their TA. These surveys collect information about the agency's overall satisfaction with the TA engagement, including the process, resources provided, staff, SMEs, and quality of TA.
3. **Long-term impact surveys** are distributed to agencies six months after they have completed their TA engagement. These surveys assess self-reported policy, training, and operational changes that have been initiated or sustained as a result of the agency's participation in the program.

Timelines

CRI-TAC timelines are generally established at the pace of the requesting agency. Once TA has commenced, target timelines for completion are generally three to six months.

Critical Response Program

CRITICAL RESPONSE

The Critical Response program is designed to provide targeted TA to law enforcement agencies experiencing high profile events, major incidents, or sensitive issues of varying need. The program is customizable and provides assistance to law enforcement agencies in a variety of ways including peer-to-peer exchanges; targeted in-depth review, analysis, and recommendations; and facilitated discussions with SMEs.

Operating principles

The Critical Response program's principles (see figure 5) are designated to ensure it provides a flexible and timely resource for agencies that have recently experienced a critical incident or identified an issue of significant community concern in their agency's operations.

Figure 5. Critical Response operating principles

Timely	When needed, the Critical Response program can quickly deliver resources, expertise, and guidance to an agency in need.
Incident- or issue-driven	TA provided under Critical Response is narrowly focused on a specific incident or issue of concern to the agency and/or community it serves.
Flexible	Services offered via Critical Response are flexible depending on the incident, issue, and needs of the agency and community.

Approach

The Critical Response program brings expertise and assistance to agencies so they can effectively respond to high-profile and urgent situations and improve operations. The program also provides the field promising practices to plan and respond to similar incidents or issues in the future. Under the Critical Response program, TA generally falls into three categories: (1) immediate delivery of TA to address a pressing and acute need, (2) after-action reviews to understand and learn from law enforcement and public safety responses to critical incidents or issues, or (3) data analysis. Each is described in the following sections.

Immediate delivery of TA

Through the immediate delivery of TA, the COPS Office provides assistance through a peer-to-peer discussion and information exchange in which law enforcement leaders connect with other leaders and SMEs who have experience and expertise in addressing similar issues. These meetings afford law enforcement leaders a mechanism to discreetly discuss and share ideas and advice on issues such as incident management, tactical operations, community engagement, communicating to the public and media, and promoting officer wellness following an incident. If needed, the immediate delivery of TA may also entail training on related topics.

After-action reviews

Through the Critical Response program, the COPS Office also provides after-action reviews of critical incidents. Through these after-action reviews, a TA provider works closely with the local law enforcement agency and other stakeholders to document their approaches, to provide feedback on strategies and tactics that were found to work, and to identify areas where improved practices could be employed in the future. After-action reviews are conducted within the general framework described in the COPS Office publication, *How to Conduct an After Action Review*.¹ A similar approach may be taken to conduct issue-specific reviews for agencies whose operational issues have come under intense scrutiny but are not directly tied to a recent critical incident or event.

Data analysis

Critical Response supports data analysis on critical law enforcement operational topics such as racial profiling, use of force, traffic stops, arrests, and staffing. This TA involves collecting, cleaning, and analyzing data as well as presenting the analysis in a manner that is understood by all stakeholders. In addition, TA may entail assisting the agency in analyzing its own data and understanding data collection needs.

¹ National Police Foundation, *How to Conduct an After Action Review* (Washington, DC: Office of Community Oriented Policing Services, 2020), <https://cops.usdoj.gov/RIC/ric.php?page=detail&id=COPS-W0878>.

Evaluation

Agencies that participate in the Critical Response program complete two surveys.

Client satisfaction surveys are distributed to all agencies that have completed their TA. These surveys collect information about the agency's overall satisfaction with the TA engagement with respect to the process, resources provided, staff, SMEs, and quality of TA.

Long-term impact surveys are distributed to agencies six months after they have completed their TA engagement and assess policy, training, and operational changes that have been initiated or sustained as a result of their participation in the program.

In addition, key stakeholders involved in the TA are interviewed regarding their experience with the process, the outcomes, and any identified areas for improved future services from the COPS Office Critical Response program.

Timelines

Critical Response sites will likely vary in duration, depending upon the scope of the project. Shorter-term executive consultations may take as little as two weeks, while in-depth reviews of specific incidents or issues can take between six and nine months.

Organizational Assessment Program

Organizational Assessment

The relaunch of the original Collaborative Reform program through an action-oriented Organizational Assessment (OA) program poses an opportunity to build on past successes while introducing program enhancements that increase collaboration, community involvement, and the timeliness of these engagements. While the program's goals remain the same as the original model's, the new approach is designed to strengthen its principles and achieve greater collaboration and results.

Operating principles

The OA program principles (see figure 6 on page 15) are intended to guide programmatic activities on all levels. Remaining committed to these principles ensures that all stakeholders, at both the federal and local level, have a shared understanding of the nature of the program and mutual expectations of the process, methods, outputs, and anticipated outcomes. The program provides a collaborative approach for law enforcement agencies and community stakeholders to jump-start and sustain significant organizational reforms. The methods for assessment, collaboration, and implementation are designed to achieve the CRI's overarching goals, adhere to OA program principles, and do so in a way that is timely and responsive to the needs of requesting agencies and the communities they serve. Compared to previous Collaborative Reform efforts, the approach features greater community engagement, faster implementation, and more routine public reporting.

Figure 6. OA operating principles

Collaborative

The agency, community stakeholders, TA provider, SMEs, and COPS Office work together on a voluntary, nonadversarial basis, committed to the common goals and the outcomes of the process.

Transparent

The process, deliberations, and outcomes will be openly communicated with the public through routine reporting.

Focused on organizational transformation

Program will focus on long-term improvements to ensure that fair, effective, and efficient policing practices are institutionalized into the culture and day-to-day operations of the organization.

Forward-looking

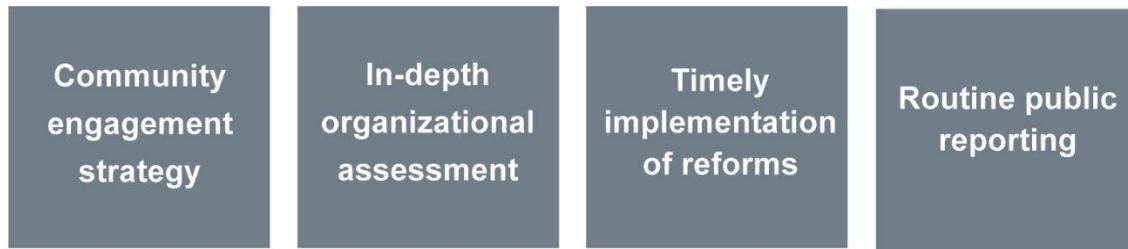
Program outputs will focus on the future state of the agency and recommendations for improvement. Agency deficiencies or failures will not be the primary points of emphasis but will be referenced in the context of future improvements.

Approach

Law enforcement agencies seeking to participate in the program commit to an approach that is transparent, collaborative, and intensive. The COPS Office, participating agencies, community stakeholders, and the TA provider work together to guide the process and its resulting reforms.

Areas for organizational improvement and reform are addressed continually throughout the process to provide timely and ongoing guidance and recommendations while also providing TA to accomplish reforms. Routine status reporting begins soon after program initiation to help ensure transparency and accountability. Key program features are highlighted in figure 7 on page 16.

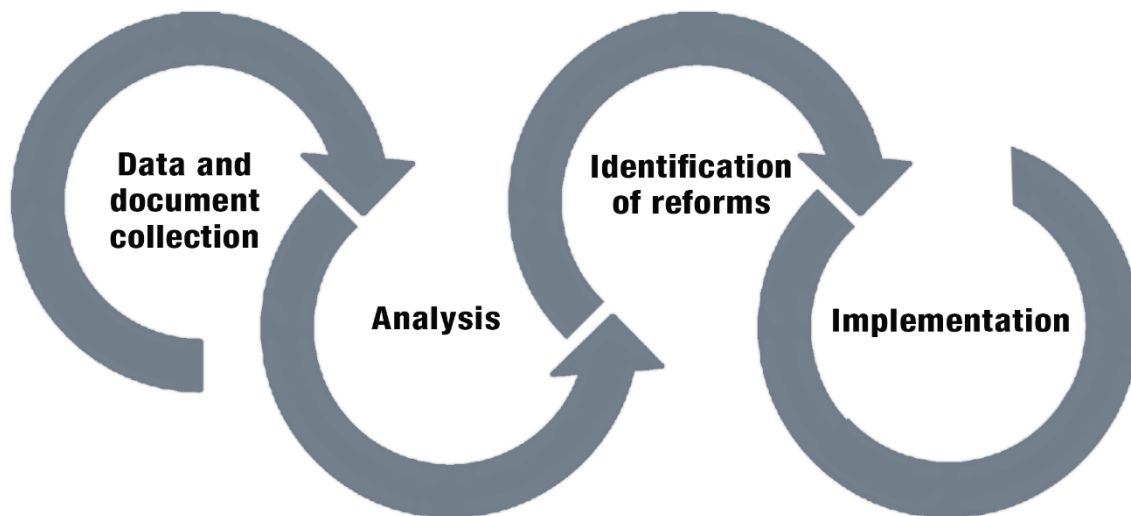
Figure 7. Key OA program features



Assessment process and implementation of reforms

The OA process prioritizes action over report writing. A continual assessment and implementation process ensures that time and resources are used to focus on identifying areas for improvement, agency strengths, and assisting with the implementation of reforms expeditiously while still providing transparency and accountability with routine public reporting. Each engagement will be supported by a multidisciplinary assessment team composed of SMEs with diverse experience and perspectives including in law enforcement, community engagement, research and evaluation, program management, organizational reform, and civil rights. Figure 8 illustrates the key steps in the assessment and implementation process.

Figure 8. OA and reform process



Assessment process

The assessment process entails standard methods such as document reviews, interviews, focus groups, and data analysis along with corroborating, deconflicting, and triangulating the various pieces of information collected during the assessment.

Assessment teams work through topics with advisement and guidance from *all* pertinent stakeholders involved in the process. In formulating recommendations for reform, assessment teams are transparent and forthcoming in the justification for each. The following are examples of items that serve as the basis for reforms:

- A well-documented and agreed-upon standard of practice (also may be tailored to the agency and community need)
- Appeal to widely accepted normative values held and agreed upon by all stakeholders
- Clear logical process improvement or efficiency to be created based on local agency and community conditions
- Promising or evidence-based practices, as documented in the scientific research literature
- Unique innovation that leverages one or more of these examples

As applicable, recommendations provided throughout the assessment are crafted within a sustainability framework, detailing the activities, processes, and structures that need to be established for the agency and community to self-sustain and continue progress on newly established practices.

Implementation


As the assessment team identifies and validates areas for reform, the agency, COPS Office, and TA provider immediately work toward implementation while balancing the need to prioritize tasks and connect interrelated reforms. Implementation occurs on an ongoing basis throughout the process. All reforms are closely monitored for completion, fidelity, and timeliness.

A joint effort and commitment of resources from the participating agency, the local government, and the COPS Office is required to support organizational improvements recommended to the agency, particularly those in need of financial investments. The COPS Office and TA provider will identify funding for training, additional consultation and TA, and other educational opportunities for the participating agency. However, many reforms, such as new equipment, technology, or staffing needs, are likely to require additional local or external funding sources.

Community and stakeholder engagement strategy

Engaging the community and other stakeholders in a meaningful way throughout the OA process is pivotal to the program's success. To this end, OA uses a two-pronged approach: one led by the assessment team and the other by the participating law enforcement agency.

Each engagement will incorporate a multifaceted strategy to obtain feedback from the community through mechanisms such as listening sessions, focus groups, individual interviews, and other methods of community engagement. The strategy for each site should be designed to help ensure the assessment includes diverse voices from a broad representation of the community.



In addition, the participating agency, with assistance from the COPS Office and TA provider, will develop a complementary agency-led community engagement strategy. The purpose of this strategy is to maximize community buy-in; ensure agency transparency; and maintain an open, two-way line of communication with the community on the agency's activities. The strategy may vary per site depending on the size and complexity of the agency and jurisdiction. The strategy should include engagement with the broader community, community and advocacy groups, relevant elected and government officials, law enforcement labor associations, businesses, and media. Types of engagement will ultimately vary but may include activities such as communicating agency progress in the program via social media, conventional media, and other electronic means; convening community members and groups to solicit input and feedback on reforms; and developing other mechanisms for continuous feedback and authentic engagement with the community on agency operations.

Routine public reporting

The COPS Office will regularly publish status updates throughout the engagement on a COPS Office site-specific web page. Each law enforcement agency that participates in the program will have a dedicated web page on the COPS Office program website that includes a summary of assessment activities conducted to date; recommendations that have been made to the participating agency; and immediate actions that are being taken by the agency, community, and COPS Office to assist in implementing the reform. Reporting is succinct and focused on the work and outcomes of the engagement. The site-specific web page also hosts a final public status report on the work accomplished through the engagement. Agencies participating in the process are also encouraged to post any reports on their own websites.

Special analytic reports

As part of their organizational assessment, agencies may request specialized reports that are data- and time-intensive, including analyses on topics such as biased policing, traffic stops, and use of force. Because of the time-intensive nature of these efforts, these types of analyses are conducted on a parallel track to other assessment efforts, with a dedicated data analysis team in close coordination with the assessment team. Organizing the assessment in such a manner will ensure that the work is completed in a timely manner and that other programmatic efforts are not delayed.

Evaluation

Agencies that participate in the OA program complete two surveys:

1. **Client satisfaction surveys** are distributed to all agencies that have completed their TA. These surveys collect information about the agency's overall satisfaction with the TA engagement with respect to the process, resources provided, staff, SMEs, and quality of TA.
2. **Long-term impact surveys** are distributed to agencies six months after they have completed their TA engagement and assess policy, training, and operational changes that have been initiated or sustained as a result of their participation in the program.

In addition, key stakeholders involved in the TA are interviewed regarding their experience with the process, the outcomes, and any identified areas for improved future services from the COPS Office OA program.

As resources are available, the COPS Office may employ other methods of evaluation to determine the program's impact. Evaluating a complex program such as OA is an ambitious undertaking. The collection of organizations, processes, and environments in which they operate poses a significant challenge. An evaluability assessment would help address this challenge by determining the limitations, benefits, and overall merit of evaluating the program given its operations. In addition, the evaluability assessment informs the COPS Office as to the best type and approach for evaluating the program—if it does indeed lend itself to a formal evaluation. Undertaking this effort would enable the COPS Office to make an informed decision about allocating additional resources toward an impact evaluation.

Timelines

The ideal timeline for engagements is a 12-month period after the intake process is completed, with the maximum time for engagements to be 18 months. During that period, it is the responsibility of all involved parties to accomplish the mutual goal of police reform while acknowledging that sustaining these efforts ultimately must be the responsibility of local agencies and communities.

Conclusion

More than 10 years in the making, the COPS Office's comprehensive suite of services is now available to law enforcement agencies nationwide. The CRI is designed to address the varying and complex needs of law enforcement agencies and the communities they serve in a way that is scalable and customizable. To support this comprehensive effort, the COPS Office has established partnerships with national technical services providers to assist in the facilitation and delivery of these services to participating law enforcement agencies. This framework serves as a foundation for providing TA services through CRI to (1) build trust between police and the communities they serve; (2) improve fairness, effectiveness, and efficiency in agency operations; (3) enhance officer safety and wellness; (4) build agencies' capacity for organizational learning and self-improvement; and (5) promote community policing practices nationwide.



By re-establishing the services of the Collaborative Reform and Critical Response programs while continuing to sustain technical assistance supported through the Collaborative Reform Initiative Technical Assistance Center, the COPS Office offers a comprehensive continuum of services to law enforcement agencies nationwide—all under the banner of the COPS Office’s flagship technical assistance program. This publication provides a strategic framework for the management, administration, and operations of the COPS Office’s Collaborative Reform Initiative.



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