SALT RIVER
PIMA-MARICOPA INDIAN COMMUNITY
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To the Membership of the Salt River Pima Maricopa Indian Community (SRPMIC),

The Community retained 21 CP Solutions, a national law enforcement consultant, to assess the Salt River Pima-Maricopa Indian Community's Police Department (SRPD) because of Community member complaints/concerns that were brought to the SRPMIC Council's attention. Each complaint was reviewed.

In addition, the Council's goal of the assessment was to review SRPD's standard operations, training and performance of police officers, their interactions with the public, and Community member perception of the SRPD. 21 CP Solutions spent time within the Community observing and meeting with Community members, officers and staff to hear issues and concerns as well as to note good practices. The assessment identified areas for improvement and offered recommendations for best practices.

21 CP Solutions completed their assessment and report and it has been shared with the SRPD staff so they had an opportunity to review the report prior to sharing information with the Community. The SRPD has begun to implement recommendations for best practices.

The Council is making the report available for Community members and the public to review 21 CP Solutions' report on the SRPD.

Council would like to thank the SRPD staff and the Community membership who participated in this process. Executive Administration and Council will work together with the SRPD to implement recommendations from the report that will improve our service to the Community. Our collective goal is to enhance and maintain the SRPD's quality service for the Salt River Pima-Maricopa Indian Community.

Thank you,

Martin Harvier
President SRPMIC

Recommendations for the Salt River Police Department

SEPTEMBER 2023

21ST CENTURY 21CP POLICING SOLUTIONS

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GREAT SEAL

SALT RIVER PIMA-MARICOPA INDIAN COMMUNITY

INTRODUCTION & SCOPE OF THE ASSESSMENT

A. Scope of the Assessment

21CP Solutions, LLC ("21CP") was asked to conduct a review of the Salt River Police Department ("SRPD" or the "Department") as it looks to strengthen community well-being and reform its Police Department into a model 21st Century policing agency.

Specifically, the Salt River Pima Maricopa Indian Community ("SRPMIC," "Salt River," or "the Community") Tribal Council engaged 21CP Solutions to conduct an evaluation that would strengthen public safety and improve policing and community well-being in the Community through a comprehensive assessment of the SRPD. The assessment focused on specific areas that the Tribal Council identified and which were based in large part on complaints the Council received from Community members in the past 24-36 months. The 21CP assessment included a review and evaluation of the following:

- o Community policing and engagement;
- o Accountability, including civilian complaints
- o Stops, searches, and arrests;
- o Use of force
- o Body-Worn Cameras
- o Facilities
- o Staffing and Recruitment
- o Training

21CP's evaluation involved both qualitative and quantitative assessment of the Police Department. Among other activities, 21CP:

- o Reviewed SRPD policies, procedures, and protocols;
- o Analyzed aggregate data regarding SRPD policing activities;
- o Reviewed and assessed police-community interactions specifically identified by SRPMIC leadership;
- o Convene one-on-one, focus group, and extensive feedback sessions with SRPD personnel;
- o Engaged with Community members to hear history, experiences, values, concerns, and ideas for the future;

Assessed the functioning of the current civilian oversight body, the Law Enforcement Commission ("LEC"), including its bylaws and complaint process to assist the Council in re-imagining oversight and accountability systems in the Community.

B. Approach

21CP typically bases its assessments and recommendations on an analysis of three primary sources of information or data: paper, performance, and people. Our work related to public safety at SRPMIC followed this approach.

First, 21CP examined an array of written materials and information concerning policing, public safety, and community safety in the SRPMIC lands. This included various policies, procedures, protocols, training materials, periodic and annual reports, and several other types of materials that assisted 21CP in gaining a better understanding of the current systems and structures pertaining to community safety and the areas of focus outlined above. These materials related both to the Community generally and to SRPD specifically. SRPD leadership and other personnel were extremely cooperative and engaged with 21CP throughout the assessment. 21CP evaluated these written materials in light of various best or promising practices, emerging approaches, and national standards. Throughout this report, we detail or reference the specific materials, and the best, emerging, or promising national practices used to consider those materials.

Second, 21CP considered some overall aggregate information about public safety at SRPMIC and the Department's activities. Specifically, 21CP examined data on crime, calls for service, arrests, citations, citizen complaints, internal investigations, use-of-force incidents, SRPD's community engagement, and other information related to the needs of the Community and its surrounding stakeholders in the metropolitan area regarding safety and well-being.

Third, between March 2022 and August 2023, 21CP engaged in a sustained effort to listen to SRPMIC members. This engagement included (1) focus groups and one-on-one interviews with Community members and other stakeholders; (2) feedback and experiences shared through a "Voices of SRMIC" email created to receive anonymous Community input; and (3) a community-wide survey that was distributed via social media platforms, targeted emails, and the Community newspaper, the *O'Odham Action News*. Through these various methods, 21CP obtained input and feedback from approximately 232 individuals who live and work in the SRPMIC. 21CP also received a dozen messages through our anonymous email account, VoicesofSRPMIC@21cpsolutions.com.

21CP's engagement efforts were necessarily shaped by the overall interest in the Community to come forward and share their experiences. 21CP strove to engage with a diverse array of the Community and worked hard to offer our focus groups and one-on-one interviews in a variety of sites throughout the SRPMIC lands and also through telephone and virtual engagements. 21CP held sessions at public locations, too, including the Way of Life Facility (WOLF), the Lehi Recreation Center, the employee-based restaurant in the administration complex, and the

Talking Stick Casino and Resort. All of these engagements were aimed at creating accessible opportunities for Community members to share opinions, views, values, histories, experiences, and ideas surrounding public safety and well-being. The following summarizes 21CP's methodologies to engage various SRPMIC members and groups.

1. Listening Sessions

Over a dozen listening sessions were convened with Community members, including residents and non-residents, as well as employees of the SRPMIC and the Talking Stick Resort and Casino. These sessions occurred on multiple days of the week and times of day. Both in-person and virtual meetings were held. To respect participant time, focus groups were structured to take no more than 90 minutes, and the SRPMIC administration provided a meal or a heavy snack to all participants.

To promote the listening sessions to Community members, 21CP worked with staff from the Community Manager's office, which sent out emails, made phone calls, and created public advertisements during the February to March 2023 and June to July 2023 time frames. These communications provided information about the upcoming listening sessions, as well as the "Voices of SRPMIC" email established to receive feedback. Additionally, various Council Members and Community influencers posted on their social media accounts and membership websites about 21CP's presence in the Community and the opportunity for engagement.

To promote high-quality and in-depth conversation in a supportive environment, 21CP intended to limit these open sessions to 20 registrants per session at the outset. These limits were aimed at providing an inclusive environment in which a diversity of voices might be heard. Specifically, a smaller-group setting can help to support individuals who may experience discomfort, fear, trauma, or difficulty discussing issues surrounding safety, policing, law enforcement, and related issues. Additionally, the focus group setting allows for moderators to ensure that all participants have an equal opportunity to contribute and speak. Further, in contrast to large, "open mic"-style forums, smaller discussion groups enable those who are less comfortable with public speaking or disclosing personal information or details to a large group to provide input in a smaller environment.

Consistent with these focus group goals, the sessions were facilitated by a member of the 21CP team. Although a 21CP team member took notes, all participants were assured that their participation was voluntary and confidential. Even as 21CP indicated that it might characterize or quote various aspects of their comments, names and identities of individuals would not be disclosed. Meetings were not recorded, and no names or other identifying information were documented.

Despite the various types of communications and outreach outlined above and sustained efforts by SRPMIC staff, administrators, and 21CP, Community member participation could have been higher for the listening sessions. Nevertheless, 21CP feels that the feedback received strengthened this report because it spoke to various experiences and perceptions from within the SRPMIC and provided concrete examples of how the Community feels about public safety and the SRPD. Through the listening sessions, 21CP was able to understand better the unique culture of the Salt River Pima Maricopa community and capture views on law enforcement from a diverse array of Community members and stakeholders. In particular, their insights and experiences provided examples of how historical trauma can remain present in a community long after an incident has occurred and even after many of the actors in a traumatic incident have moved on. The listening sessions were a reminder that even when law enforcement practices may be done correctly and within the confines of a policy, historical trauma can mar one's perceptions of the present and challenge one's capacity to trust any government agent. This was an important insight that helped to guide this report.

2. *One-on-One Interviews*

Building on the experience from the March site visit (in which the listening sessions were only sparsely attended) and wanting to ensure the comfort and privacy of SRPMIC members, 21CP met with several Community members in a one-on-one format in the spring and summer. Similar in goals and methodology to the listening sessions, these interviews were held for 30 to 60 minutes with the Community members and one or two 21CP consultants. The same parameters surrounding confidentiality and anonymity applied. Between the listening sessions and one-on-one interviews, a total of 43 SRPMIC members participated in discussions with 21CP.

3. *SRPD Personnel*

21CP engaged with various members of the SRPD, including executive leadership, managers, first-line supervisors, officers, rangers, dispatch personnel, and other professional staff. 21CP endeavored to speak with SRPD across various ranks, assignments, and years with the Department. Various discussions addressed current SRPD and officer interactions with Community members, response dynamics, community safety and crime trends, the role of SRPD officers, internal operations and culture, employees' understanding of SRPMIC history and culture, Community engagement and outreach efforts, and many other topics. A total of 85 members of the SRPD participated in 21CP's focus groups and interviews. Additionally, 21CP consultants participated in ride-alongs with SRPD patrol officers.

4. Community-wide Survey

To learn more about the experiences of SRPMIC members and other stakeholders, 21CP worked with the City Manager to disseminate a survey to Community members, asking them about their feelings of safety in the Community and experiences with the SRPD. A total of 87 individuals participated in the survey. They offered 21CP a variety of insights, which were generally similar to those gathered during the listening sessions and one-on-one interviews.

Of those who participated, 85% were members of the tribe and lived in the Community. 70% of the respondents were female, and the average respondent was 25-44 years of age. 65% of the respondents had interactions with the SRPD in the last 12 months, largely because they called the police for assistance. Of those, only 28% were satisfied with the interaction; 44% were either dissatisfied or very dissatisfied.

50 of the 87 respondents answered a follow-up series of questions about their perceptions of the officers they encountered. These respondents said the following:

- 24% disagreed with the assertion that the SRPD is professional, and another 24% remained neutral to the question;
- 48% disagreed with the assertion that SRPD personnel performs their jobs with integrity, are responsive to Community issues, and use good judgment in the physical use of force; and
- 78% did not feel the SRPD takes complaints against officers seriously and investigates them.

44 respondents provided open-ended comments in the survey. As discussed in further detail throughout the report, the feedback received via the Community survey was varied:

"I feel they are doing a great job and only doing what is necessary to keep our Community safe.... When I do come across our PD, I make sure to acknowledge [them] and have my grandchildren acknowledge [them] with a hello."

"They treat the community poorly, never respectfully. They are rude and yell all the time. They never try to de-escalate situations; they make it worse."

"Overall, I believe that SRPMIC is a safe place to live and raise a family. In my current home, I feel comfortable leaving my doors unlocked when we are home and usually only lock our doors when sleeping."

"I believe there needs to be more policing within the community not just on the freeways or surrounding enterprises. There is a rarity when I see a police officer driving or community policing with neighborhoods."

"SRPMIC PD does a great job in a difficult environment."

"At night, they drive with 'brights' on, When I flash them they do not turn off their brights. That is a safety issue causing to temporarily blind me at night."

"I appreciate and feel safe if police patrol in my area but usually don't see patrol unless something is happening nearby."

5. *The Role of Community Engagement in the Assessment and Report*

Regardless of affiliation or relationship to SRPMIC – whether they be members, employees, administrators, members of SRPD, stakeholders, or others – individuals elected to speak with us voluntarily, submit comments to the "Voices of SRPMIC" email, or take part in the survey. This means that Community participants in 21CP's engagement were self-selected, not randomly selected. Consequently, the views of participants cannot be extrapolated to the entire SRPMIC or any particular subgroup.

In other words, the views of participants in our Community conversations and electronic communications may or may not represent or reflect the opinions of the SRPMIC as a whole. For instance, it may be that individuals with more positive views about public safety in the Community, or with more positive experiences involving SRPD, were more likely to engage with 21CP. It may also be that individuals who say they feel less safe in the Community, or who raised concerns about SRPD's practices, were relatively more interested in talking about such issues and were, therefore, more represented in focus groups, interviews, and electronic communications than the overall Community.

Likewise, the "sample" of the Community with whom we spoke, including in the survey, focus groups, interviews, and through the "Voices of SRPMIC" email, was not statistically significant. Substantively, this means that it is entirely possible that, during our engagement process, some important views were not, or were not sufficiently, represented simply because of the particular nature of the individuals with whom we interacted.

Despite these limitations, small-group discussions, semi-structured interviews, focus groups, and convenience-sample-based questionnaires are appropriate and useful methods of qualitative research:[1]

> [Q]ualitative research … allows you to identify issues from the perspective of your study participants, and understand the meanings and interpretations that they give to behaviour, events, or objects …. Qualitative research is useful for exploring new topics or understanding complex issues; for explaining people's beliefs and behaviour; and for identifying the social or cultural norms of a culture or society.[2]

Another set of conversations with different Community stakeholders might yield different or additional insights. However, the 21CP project team believes that the commonality of a number of themes and the recurrence of several issues and suggestions indicate that the views of the stakeholders with whom we spoke reflected at least some material and important part of the Community.

In describing recurring themes and areas of feedback, this report cites, characterizes, and sometimes quotes stakeholder participants from our focus groups, interviews, and emails. To ensure candid discussions and preserve the confidentiality of participants who sometimes shared sensitive or traumatic experiences, 21CP did not record the identities of who said what during focus groups and interviews. Their self-identified demographic characteristics or SRPMIC affiliations were recorded, when participants referenced them, for context, along with the specific contents of what they said. Accordingly, this report refers to the views and comments of stakeholders in generic ways – as "a member," "an employee," or the like. When quoting from responses to the electronic feedback, this report generally preserves the original emphasis, wording, and formatting, adding material in brackets as necessary to clarify meaning.

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[1] *See, e.g.,* Steven J. Taylor, et al, *Introduction to Qualitative Research Methods* (4th ed. 2015) (describing various modes and standards of qualitative inquiry); Pranee Liamputtong, *Focus Group Methodology: Principles and Practice* (2011) (summarizing approaches to focus group research); Gisela Bichler and Larry Gaines, "An Examination of Police Officers' Insights into Problem Identification and Problem Solving," 51 *Crime & Delinquency* 53 (2005) (applying focus group or group interview techniques to police officers).

[2] Monique Hennink, et al, *Qualitative Research Methods* 9–10 (2011).

C. The Role of This Report

21CP again observes that – even as its scope of work necessarily implicates a variety of important issues and community topics, and even as the approach that 21CP took to completing its evaluation involved the analysis of substantial information and engagement with a number of stakeholders – 21CP's work at SRMPIC was not a fully exhaustive, encyclopedic evaluation of public safety in the Community or of the practices, policies, procedures, or performance of SRPD. The Council engaged 21CP to address an important set of topics, not the least of which was accountability systems. Where appropriate in this report, we note areas where it may be useful for the SRPMIC to devote additional resources in the future or to partner with local academic and cultural resources to explore further or to conduct additional analysis.

21CP approached its engagement at SRPMIC, and the crafting of the recommendations contained in this report, with humility. Although we believe that the recommendations presented here are grounded in best practices, emerging and promising public safety approaches, and an understanding of critical community dynamics in the Community, 21CP is not a part of the SRPMIC. It is possible, if not probable, that these and other limits to our approach may have led us to overlook details, miss nuance, or bypass some areas of importance. Consequently, any work to implement or engage with the recommendations of this report will likely be aided by additional and continuing Community feedback and engagement.

This report aims to provide specific guidance and practical recommendations for the Salt River Pima Maricopa Indian Community and its Police Department. We believe the SRPD is well-positioned to implement the recommendations presented here. In 2020, the SRPD became only the fifth law enforcement agency in Arizona – and the first tribal agency – to be fully accredited by the Arizona Law Enforcement Accreditation Program (ALEAP). And the Department's Public Safety Communications Bureau is soon expected to be the first 911 center in the state to be accredited by ALEAP.[3]

The SRPMIC is not alone in encountering the topics that this report addresses. 21CP has conducted, and is conducting, similar reviews for other police agencies that address many of the same issues and topics. Perhaps unsurprisingly, given the common challenges that police departments (including tribal agencies) face today, some of the recommendations we propose for SRPMIC are similar

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[3] For more information about the Arizona Law Enforcement Accreditation Program, visit https://www.azchiefsofpolice.org/.

to recommendations we have made for other agencies. Even where this report makes similar recommendations – and in some cases contains similar language, examples, and/or citations used in other reports – the specific realities of the SRPMIC, its members, and police department are the focus and foundation of the recommendations contained here.

There are two important considerations to keep in mind about this report:

1. The findings and recommendations reflect 21CP's analysis at the time of publication. As is customary with all our engagements, we gave the Salt River Police Department and the SRPMIC Council a preview of the report prior to final publication. As a result, in some instances, the SRPD and the Council have already begun planning for and implementing specific recommendations. These efforts, however, are not reflected in this report.

2. Many of the recommendations in the report are directed at the SRPD, and it will be up to SRPD leadership to review and implement them. Other recommendations require decisions from the SRPMIC Council. And still others may involve both the Police Department and the Council. No one individual or entity will be responsible for implementing all of the recommendations in this report; rather, it will require a cooperative effort of the SRPD, the Council, and, in some instances, the Community.

This report does not have all of the answers. We do not have all of the answers. For that matter, it is unlikely that any one of the SRMIC's stakeholders alone has all of the answers when it comes to issues surrounding the safety and well-being of the Community. The remainder of this report outlines a set of specific approaches and actionable recommendations in the areas of focus identified in our comprehensive assessment of SRPD and the community oversight bodies available to the SRPMIC.

I. COMMUNITY POLICING

Since the early 1990s, police agencies across the United States have adopted the strategy of "community policing" to varying degrees. The U.S. Department of Justice, Office of Community Oriented Policing Services (COPS) defines community policing as "a philosophy that promotes organizational strategies that support the systematic use of partnerships and problem-solving techniques to proactively address the immediate conditions that give rise to public safety issues such as crime, social disorder, and fear of crime."[4] In the past three decades the federal government, through the Justice Department and other agencies, has provided more than $14 billion to jurisdictions across the country for community policing initiatives.[5]

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[4] U.S. Department of Justice, Office of Community Oriented Policing Services, *Community Policing Defined* (2014), https://portal.cops.usdoj.gov/resourcecenter/RIC/Publications/cops-p157-pub.pdf.

[5] U.S. Department of Justice, Office of Community Oriented Policing Services, https://cops.usdoj.gov/grants (last visited Sept. 11, 2023).

Over the years, however, the term "community policing" has become muddled and inconsistently applied. Agencies have tended to group widely varying types of initiatives, approaches, and programs under the banner of "community policing."[6] Instead of being a department-wide philosophy that guides all police operations, community policing in many agencies has become little more than a series of isolated and disconnected community engagement programs – "coffee with a cop" get-togethers, officers participating in youth sports games, and the like. Consequently, a number of purported community policing efforts have devolved into little more than "check-the-box" activities, while the bulk of the agency's work continues to center around traditional, reactive, enforcement-based policing.

The President's Task Force on 21st Century Policing emphasized that real "community policing" is not just a standalone activity or a set of outreach initiatives but rather a core approach that "should be infused throughout the culture and organizational structure of law enforcement agencies."[7] The Task Force also stressed that community policing relies on agencies building trust and earning legitimacy with the community. "Building trust and nurturing legitimacy on both sides of the police/citizen divide is the foundational principle underlying the nature of relations between law enforcement agencies and the communities they serve. Decades of research and practice support the premise that people are more likely to obey the law when they believe that those who are enforcing it have authority that is perceived as legitimate by those subject to the authority."[8]

The COPS Office has identified three core components of community policing: (1) community partnerships; (2) organizational transformation; and (3) problem solving.[9]

These three components are interconnected, and all three are necessary elements of true community policing. An agency cannot practice meaningful problem solving without community partnerships and organizational transformation. By the same token, simply forming partnerships with the community without transforming the organization and engaging in collaborative problem solving is not effective community policing.

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[6] The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* (2019), https://civilrights.org/resource/new-era-of-public-safety-a-guide-to-fair-safe-and-effective-community-policing/.

[7] Final Report of the President's Task Force on 21st Century Policing (2015), https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf.

[8] *Id.*

[9] U.S. Department of Justice, Office of Community Oriented Policing Services, Community Policing Defined (2014), https://portal.cops.usdoj.gov/resourcecenter/RIC/Publications/cops-p157-pub.pdf.

In our examination of community policing in the Salt River Police Department, 21CP Solutions found that, while its efforts are well intentioned, the SRPD is not yet fully embracing or implementing the three core elements of the strategy. Rather than treating community policing as a Department-wide philosophy to be practiced by all Department members, the SRPD has, like many other law enforcement agencies, adopted a somewhat disjointed approach that is not achieving the strategy's full potential.

Here is our assessment of where the SRPD stands on the three core components of community policing.

A. COMMUNITY PARTNERSHIPS

"Effective partnerships between law enforcement and community stakeholders are essential to public safety, and it is important that government agencies, community groups, nonprofits, businesses, and private citizens all embrace public safety as a shared responsibility."[10]

Chief Auerbach places a strong emphasis on SRPD officers getting to know the Community and treating Community members with "service, respect, professionalism, and dedication." However, the 21CP team found the depth and breadth of those partnerships to be lacking.

The Police Department organizes and participates in several activities with the Community throughout the year. These include sports games, Shop with a Cop, back-to-school events, and other interactions with youth, including with the SRPMIC Young River People Council. In addition, SRPD personnel regularly participate with three Block Watch groups in the Community, attend every District Council District meeting, and join monthly prayer group and senior breakfast meetings. However, these activities seem to be largely isolated, one-off events not necessarily directed at forming long-term partnerships with Community members or addressing specific crime and disorder problems that are of concern to the Community.

21CP heard from numerous community members who said they did not know the police officers who patrolled their neighborhoods and wouldn't know how to contact them if they had an issue, concern, or idea they wanted to discuss. Some Community members said that police officers attend events in the Community

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[10] U.S. Department of Justice, Office of Community Oriented Policing Services, *Community Partnerships,* https://cops.usdoj.gov/communitypartnerships (last visited Sept. 11, 2023).

only sporadically, and when they do, the officers tend to group together and do not actively engage with Community members.

When it comes to day-to-day patrols, the Chief and other Department leaders encourage officers to devote some of their patrol shifts to community policing activities. The Department has a code ("586") that allows officers to go "off the radio" and spend that time engaging with the Community. However, our analysis found that SRPD officers spend only a small fraction of their time engaged in community policing. In 2022, community policing accounted for less than 8% of SRPD officers' self-initiated activity (see Stops, Searches, and Arrests Section). Furthermore, SRPD data is not clear on exactly what officers are doing when they are off the radio and "going 586," and there is little indication that sergeants are closely monitoring these activities and holding officers accountable for effectively engaging with the Community when they are "586."

Significantly, Community members told 21CP interviewers that many SRPD officers do not understand the history, culture, and traditions of the Salt River Pima Maricopa Indian Community or appreciate the unique nature of the Community they serve. As one Community focus group participant noted, SRPD officers "need to understand we are not just 'John Q. Public.' We are your community." Others went on to say:

> *"Our elders are held in high respect; they carry our history, songs and prayers. Our children are our future and they are also held in high regard as well as medicine people. These behaviors [of the SRPD] [do] not honor our culture."*

> *"In the last 20 years, SRPD has become disconnected from our Community's traditional values and perspectives; there's little to no understanding (generally speaking) and has become dramatically militarized over the last eight years, not just in their equipment but in the department's culture. I support law enforcement, but the department is definitely not a part of my Community. They try to host superficial events that have no relevance in a tribal community."*

> *"When I was a kid, [the] tribal police was someone from the Community but then they started bringing in people from outside and everything changed.... There were people who were [from] here and were coming and building relationship[s], and then it's like the chief just moved them [either] moved to nights or been moved somewhere else [and] we no longer feel represented."*

> *"Police don't mingle with us. We are a story-telling people. They don't tell us who they are or where they are from."*

> *"They do not understand the importance of elders in our Community and have caused us all harm by the way they have treated our elders."*

A large part of this perception likely stems from a lack of training and education. All new employees get a basic Community overview during orientation provided by the Community government. And over the years, SRPD employees have received various classes on "cultural awareness" or "cultural sensitivity," but these appear to be neither comprehensive nor particularly impactful. Recently, Commander Walter Holloway (who is a Community member) designed and delivered a 1.5-hour course to new officers on the history and culture of the SRPMIC. It covers a range of important topics, but, given its relatively short length and the richness and complexity of the Community, the course necessarily can only scratch the surface of this critically important element of community understanding and partnerships.

Information-sharing is another critical element to forming strong police-community partnerships. The SRPD's efforts here are uneven. The Department maintains an active Facebook page, which is a primary channel for communicating with the Community.[11] However, several Community members said they are not on Facebook or don't check it regularly. A 21CP analysis of recent Facebook posts found that they primarily focused on areas such as SRPD-sponsored community events; reporting of missing persons; recruitment information; the Department's School Resource Officer; and occasional safety alerts about scams, street racing, coyote safety, etc. Although the SRPD's Facebook page has approximately 1,700 followers, its posts generate few reactions or comments, and some comments appear to be hidden. This suggests that the SRPD is not using Facebook to engage with the Community in a truly interactive, bidirectional fashion.

SRPD's website[12] includes a wealth of information about the Department, but its content is largely static and not regularly updated with recent news or agency developments. The SRPD occasionally places articles in the biweekly *O'Odham Action News,* as well as safety tips and crime prevention messages,[13] but the Department does not have a regular presence in the newspaper, which seems to be a trusted source of information for many in the Community. The SRPD also offers occasional Community-wide forums on topics such as gang and drug abuse. However, some of the Community members 21CP spoke with said these sessions, while informative, were not always geared toward the specific issues and concerns of the SRPMIC.

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[11] Facebook, Salt River Police Department, https://www.facebook.com/SaltRiverPD (last visited September 19, 2023).

[12] Salt River Pima-Maricopa Indian Community, government, Salt River Police Department, https://www.srpmic-nsn.gov/government/srpd/ (last visited Sept. 19, 2023).

[13] *O'Odham Action News,* https://oan.srpmic-nsn.gov/ (last visited Sept. 19, 2023).

Community members also said they do not routinely get information *from* the SRPD on topics of interest and importance to them, such as recent crimes and emerging crime trends, crime prevention safety tips, new SRPD programs, upcoming events, and profiles of newly hired or promoted personnel. 21CP found that this lack of information can lead to rumors and misinformation about crime in the Community and SRPD's efforts to address it. This, in turn, undermines Community trust in the Police Department.

B. ORGANIZATIONAL TRANSFORMATION

"Organizational transformation is the alignment of management, structure, personnel, and information systems to support community partnerships and proactive problem solving." [14]

The SRPD has some of the basic building blocks in place for implementing community policing. The Department is organized into discrete police beats that generally conform with the neighborhoods and geography of the Community, and officers are encouraged to remain on their beats while they are on duty. Officers are well-equipped to carry out their day-to-day responsibilities, and they have access to a wide range of technologies, including body-worn cameras, drones, and various information systems. In addition, the Department provides officers with a wide range of internal and external training opportunities.

What is missing from the SRPD is an organizational culture and climate that fully embrace community policing and infuse it throughout the agency. While the Chief has made clear his commitment to many community policing principles, that message does not always make its way to all SRPD personnel and it is not always incorporated into the Department's practices and priorities. For example, many of the SRPD's community engagement activities are organized and frequently staffed by the centralized Public Information Office, although other SRPD personnel do frequently attend. Greater involvement by neighborhood patrol officers in planning and executing these events would increase the opportunities for Community members to establish meaningful partnerships with the police officers who regularly patrol and serve their neighborhoods.

Forming strong partnerships with the community and engaging in proactive problem solving do not occur through policy or pronouncement alone. They need to be reinforced every day at all levels of the organization. Ultimately, community

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[14] U.S. Department of Justice, Office of Community Oriented Policing Services, *Organizational Transformation*, https://cops.usdoj.gov/organizationaltransformation (last visited Sept. 19, 2023).

policing must be the shared responsibility of every member of a police agency – not just a few specialists.

C. PROBLEM SOLVING

> "Community policing emphasizes proactive problem solving in a systematic and routine fashion. Rather than responding to crime only after it occurs, community policing encourages agencies to proactively develop solutions to the immediate underlying conditions contributing to public safety problems."[15]

Problem solving, the third and final core element of community policing, is where the community partnerships a police department has formed and the organizational transformations it has undertaken come together to address crime and disorder problems in a strategic, proactive, long-term manner. Problem solving is where "the rubber meets the road" in community policing.

Under a problem-oriented strategy of policing, officers who are assigned to a particular neighborhood work hand-in-hand with residents, government agencies, and other stakeholders to collectively identify, analyze, and address crime or quality-of-life problems in their community. Problem solving attempts to move beyond the traditional, reactive approach to addressing crime, which typically involves a resident calling the police, officers responding and attempting to address that one incident, only to have similar incidents continue to occur in the same neighborhood days or weeks later. Using problem solving, police and community develop a more focused and proactive strategy that gets at the underlying conditions that are creating the problem in the first place and then addresses them in a comprehensive, longer-term fashion.

During the assessment, 21CP heard numerous Community members (and, in some cases, police officers) express concern about ongoing, persistent crime or safety problems in their neighborhoods. These included areas with high concentrations of illegal drug activity and associated problems (of particular concern was an area known as "Pill Alley" or "Pillville," which was mentioned by more than one Community member); speeding and other traffic safety issues; gang-related activity; and disturbances at the casinos located in the Community, to name a few.

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[15] U.S. Department of Justice, Office of Community Oriented Policing Services, *Problem Solving*, https://cops.usdoj.gov/problemsolving (last visited, September 11, 2023).

Some Community members reported they do not routinely call the police about these and other problems because the police response to their calls is not solving the problem. It is likely that each of the SRPD's seven police beats has one or more of these types of persistent crime or safety issues that could be addressed through a problem-oriented approach.

Our analysis found that while the SRPD introduces the concept of problem solving to its officers, the strategy is not well defined, officers are not trained in how to do it, and, as a result, there is limited true problem-solving taking place.

SRPD Operations Order 4.24 on community-based policing requires that the Department "allocate time and provide sufficient line-level authority to identify and solve neighborhood problems using the SARA Model." SARA is an acronym for **S**canning, **A**nalysis, **R**esponse and **A**ssessment. It was developed in 1984 by the Newport News, Virginia Police Department and the Police Executive Research Forum to provide a tool to guide officers' problem-solving initiatives. It has been adopted by police agencies across the United States and around the world.[16] However, beyond this reference to the SARA Model, there is no further mention of problem solving in SRPD Operations Order 4.24. Instead, most of the order is devoted to a list of 15 Community programs – some of which appear to be no longer supported by the Department.

Relatedly, as part of their Advanced Officer Training (AOT), new SRPD recruits who have completed the state-authorized basic academy receive 90 minutes of training on community policing. This course includes a brief description of the SARA Model, but there does not appear to be much discussion or analysis of when and how officers are expected to use the model when they complete their AOT.

21CP conducted focus groups with patrol officers, supervisors, and command level personnel to gain insight and understanding of their perspectives on Department and Community issues and their approach to policing. Community policing was mentioned by a few participants, but many seemed to view community policing as primarily the responsibility of centralized units such as the Public Information Office. Problem solving was never mentioned as a responsibility of patrol officers.

Effective problem solving requires the collaboration of not only police and residents, but also other community stakeholders, including government agencies, elected officials, business owners, faith leaders, and the like. Our analysis found

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[16] For more information about the SARA Model, see U.S. Department of Justice, Office of Community Oriented Policing Services, *Community Policing Defined* (2014), https://portal.cops.usdoj.gov/resourcecenter/RIC/Publications/cops-p157-pub.pdf.

that, in some incidents, the SRPD has established strong relationships with some of these entities, especially other SRPMIC government agencies. For example, the Department works closely and effectively with Community Counselors, who often respond along with police officers to calls involving individuals in a mental or behavioral health crisis. Additionally, the SRPD is part of the Family Advocacy Center, which brings together police, prosecutors, social services, and other entities to address crimes against children in a collaborative, holistic manner. In addition, through its work with the three Block Watch groups in the Community, the SRPD has successfully resolved some quality-of-life issues.

These efforts demonstrate that, given the right conditions and organizational priority, the SRPD is capable of forming collaborative partnerships to address problems. What is needed is an organized, sustained, and strategic approach to problem-solving at the neighborhood level.

Recommendation 1. The SRPD should embrace community policing as a Department-wide philosophy built on the three core components of community partnerships, organizational transformation, and problem solving.

21CP found that "community policing" in the SRPD has essentially become a collection of isolated community events, often carried out by specialized units such as the Public Information Office. These efforts are not directly connected with forming long-term police-community partnerships or addressing persistent crime and safety problems. The SRPD is not alone in this situation. Many police agencies across the United States that claim to practice "community policing" follow a similar approach.

The SRPD has an opportunity to reimagine and restart its approach to community policing. This can be achieved by focusing on the three core components of community policing discussed above: (1) community partnerships, (2) organizational transformation, and (3) problem solving. As SRPD refocuses and grows its efforts, community policing must be the responsibility of every member of the SRPD, and all employees should be given the training, tools, and support to implement the philosophy.
In particular, 21CP identified some specific actions that the Department can use to jumpstart community policing in the SRPD.

> **Recommendation 1(a). The SPRD should provide its employees with in-depth, immersive, and ongoing education on the history, culture, and traditions of the SRPMIC.**

For a police department to form strong and lasting partnerships with the community it serves, department members must first know and understand that community. This is especially important in Native American communities such

as the SRPMIC. The SRPMIC has a long and sometimes painful history, especially in its dealings with non-Native settlers who came to the area. The SRPMIC also has a unique culture and distinctive traditions that have developed over the years and been passed down from generation to generation. The history, culture, and traditions of the SRPMIC fundamentally shape the Community of today, and they have an enormous impact on policing in the Community. However, as discussed previously, several Community members 21CP spoke with expressed frustration that more SRPD officers do not seem to understand or appreciate the unique nature of the Community they are serving.

Most SRPD officers and employees are not Community members – nor are they members of other Native tribes. Consequently, many do not know the history of the SRPMIC or fully understand and appreciate its culture and traditions. This lack of knowledge and understanding can hinder officers' ability to form stronger partnerships with Community members and engage in effective problem solving.

Both tribal and non-tribal police agencies have embraced cultural competency education. For example, the Penobscot Nation in Indian Island, Maine has developed, in conjunction with its community, "formal and information cultural awareness training for officers to help them understand customs, religious ceremonies, and basics of the native language."[17] Similarly, in the Leech Lake Band of the Ojibwe, the Leech Lake Tribal Community College has a specialized criminal justice program designed at recruiting and educating future law enforcement officers of the area's multiple tribes. Focused on community policing, cultural awareness, and daily cultural rituals throughout the college's curriculum, enrolled students, "learn to understand the culture they are going to experience in the field."[18] Additionally, the National Criminal Justice Training Center has developed resources on cultural competency to help police officers work more effectively in Native American communities.[19]

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[17] See International Association of Chiefs of Police, "Three Strategies to Enhance Tribal Community Policing During National Native American Heritage Month" (Nov. 13, 2014), https://www.theiacp.org/news/blog-post/three-strategies-to-enhance-tribal-community-policing-during-national-native.

[18] Center for American Progress, A Minnesota Tribal College Teaches Law Enforcement in an Effort to Put More Native Americans behind the Badge (Dec. 2022), https://www.americanprogress.org/article/a-minnesota-tribal-college-teaches-law-enforcement-in-effort-to-put-more-native-americans-behind-the-badge/.

[19] See, for example, the NCJTC's two-part webinar on "Cultural Considerations When Working Within Indian Country," recorded February and June 2021, *available at* https://ncjtc.fvtc.edu/trainings/TR00428964/TRI0428977/cultural-considerations-when-working-within-indian-country-part-1; https://ncjtc.fvtc.edu/trainings/TR00533278/TRI0533281/cultural-considerations-when-working-within-indian-country-part-2.

Several municipal police departments also provide their new recruits with in-depth and immersive training on the history of policing in their cities, with a focus on race relations. These include the police departments in Tucson,[20] as well as Washington, D.C.; New York City; Chicago; Memphis; and New Orleans.[21] The Daytona Beach, Florida Police Department provides in-depth instruction to its veteran officers.[22]

Over the years, the SRPMIC government and the Police Department have provided various "cultural awareness" and "cultural sensitivity" classes to new SRPD employees, but, for the most part, 21CP understands that this training has typically involved static PowerPoint presentations. Stakeholders observed that the courses have not been comprehensive or particularly impactful. The 1.5-hour course on SRPMIC history and culture recently developed by Commander Holloway is an important step toward providing a more in-depth course of instruction for new officers, but it is not as comprehensive or immersive at this type of training needs to be.

Rather than brief, classroom sessions that only scratch the surface of SRPMIC history, culture, and traditions, SRPD employees should receive education about the Community that is more in-depth, immersive, and ongoing. Specifically:

- New officers going through Advanced Officer Training should receive up to a week focused on these topics. New officers should spend most of that time not in the classroom but out in the Community, meeting with families, visiting Community resources, observing or participating in Community events, and having open and candid conversations with Community members.

- Veteran officers should complete a condensed version of the training but should still spend considerable time directly interacting with and learning from Community members.

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[20] Stephanie Casanova, Shaq Davis, "Community Advocates Bring Cultural Awareness Training to Tucson Police Recruit," *Arizona Daily Star* (June 11, 2021), https://tucson.com/news/local/community-advocates-bring-cultural-awareness-training-to-tucson-police-recruits/article_faf1b4ac-b43d-11eb-a8ab-035f3cc57555.html.

[21] Police Executive Research Forum, *Transforming Police Recruit Training: 40 Guiding Principles* 44–45 (2022), www.policeforum.org/assets/TransformingRecruitTraining.pdf.

[22] Patricio G. Balona, "Diversity training creates a safer community for residents and police officers," *Daytona Beach News-Journal* (Sept. 8, 2021), https://www.news-journalonline.com/story/news/2021/09/08/daytona-beach-police-diversity-training-focuses-cultural-differences/5407368001/.

- Refresher courses should be developed and provided as part of the in-service training calendar.

- The classes should be provided to both sworn officers and professional staff employed by the SRPD, with an emphasis on dispatchers and other personnel who have Community-facing positions.

In developing this instruction, the SRPD should partner with members of the Community, the Council, and other stakeholders. For example, institutions such as the Huhugam Ki: Museum (located in the Community), the S'edav Va'aki Museum, and the Heard Museum (both in Phoenix) could help develop and deliver educational programming.[23] The Department should also utilize current employees who are Community members to be involved in the instruction.

> **Recommendation 1(b). The SRPD should update Operations Order 4.24 to describe with greater specificity the Department's strategy and approach to community policing and problem solving or supplement the order with a formal Community Policing Plan.**

For agencies to successfully implement problem solving, they need to clearly describe what the strategy entails and articulate expectations for how it will be implemented. Then, agencies need to train both their own personnel and Community members in how to carry out effective problem solving.

SRPD's Operations Order 4.24 provides only a passing reference to problem solving and the SARA Model (Scan, Analyze, Respond, Assess). This order needs to be dramatically expanded or a supplemental Community Policing Plan needs to be created to include a more complete description of what community policing and problem solving are, how the SARA Model works, what the strategy looks like in the SRPD, and the expectations of Department members in carrying out the strategy. This order or Community Policing Plan and the subsequent training on it should include among other things:

- A specific inventory and description of problem-oriented policing tactics;
- A description of conflict resolution techniques, including verbal

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[23] The Law Enforcement and Society program, originally developed by the Anti-Defamation League, the U.S. Holocaust Memorial Museum, and the Metropolitan Police Department of Washington, DC, is an example of an educational collaboration between a police department, a museum, and other stakeholders. With the Holocaust as the backdrop, the training "highlights the core values of American law enforcement and their unique role as protectors of the Constitution and individual rights." For more information, see Anti-Defamation League, Education & Outreach, Law Enforcement and Society (Aug. 29, 2013), https://dc.adl.org/initiatives/law-enforcement-and-societ/.

de-escalation of conflict;
- Public safety and crime prevention strategies, including community engagement, neighborhood partnerships, and mechanisms for addressing quality-of-life issues; and
- Methods of ongoing, person-to-person community engagement.

Best practices in community-centered, problem-solving policing in any police department must also include strong emphasis on procedural justice, bias-free policing, least-intrusive response approaches, and strategic and cross-cultural communications skills.

> **Recommendation 1(c). The SRPD should provide in-depth training on community policing and problem solving to its employees and Community members, with a focus on how to use the SARA Model to address crime and public safety problems in each police beat.**

Once the policy on community policing has been updated, the SRPD should launch an intensive campaign to train both Department employees and Community members in community policing and problem solving. All members of the SRPD must understand that their primary role and duty is to be a public servant, a guardian of the community. It is the responsibility of not only police leadership but all Department members to, "be transparent and responsive [to the community while implementing police services] and [to] promote and explain its philosophy and activities as often as possible with stakeholders, [a]llow[ing] tribal members to ask questions and share their comments and complaints."[24]

Within the SRPD, the training should initially focus on patrol officers and first-line supervisors, who will be primarily responsible for implementing community policing and problem solving at the neighborhood level. They will need a thorough, interactive, and hands-on course of instruction – not simply a 90-minute PowerPoint presentation. A major focus on this training should be on communications skills and how to work effectively with Community members.

In addition to patrol personnel, all SRPD employees must play a role in community policing and should be trained. Investigators, specialized units, crime analysts, dispatchers, and other personnel should be trained in the basics of the SRPD strategy and how they can support it. For example, crime analysts will be expected to produce regular reports on crime and calls for service in each police

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[24] U.S. Department of Justice, Office of Community Oriented Policing Services and the International Association of Chiefs of Police. *Promising Practice in Tribal Community Policing* (Dec. 2016), https://www.theiacp.org/sites/default/files/all/t/TribalCommunityPolicing.pdf.

beat, to help with the identification of priority problems to be addressed (see Recommendation 1(d) below). Investigators can provide useful information about how crimes are occurring and tips on how those crimes can be prevented.

It is also critical that Community stakeholders be trained in how to effectively partner with the Police Department and engage in problem solving. Community policing and problem solving require residents, business owners, elected officials, other government agencies, faith leaders, and others to do more than simply serve as the "eyes and ears" of the police. These stakeholders must be actively involved in identifying and prioritizing the problems to be addressed, developing and implementing strategies, and assessing what worked and what did not. As these are likely new roles for most SRPMIC members and other stakeholders, they will need to undergo thorough, hands-on training on what problem solving is and how they can be actively engaged in the process. This training should be open to all segments of the Community and be organized to fit their time schedules.

Once SRPD officers have been assigned to their consistent beats (see Recommendation 1(d)), there should be opportunities for police and Community members to be trained together in problem solving and, specifically, the use of the SARA Model.[25] That model can provide a structured approach for residents and police to jointly identify priority problems in their community, analyze those problems, and respond to them in a strategic, collaborative manner.[26] Documenting the problem-solving process is critical to effective implementation of the SARA Model. Therefore, it is important that this training also include instruction on how to create written action plans that describe the problem, analysis, and action steps to be taken by police, Community, and other stakeholders. Having Community members and police train jointly in the nuts-and-bolts of problem solving helps ensure that all parties are operating from the same foundation of knowledge and approach.

> **Recommendation 1(d). SRPD should assign patrol officers and sergeants to the same police beats for a minimum of one year ("continuity of assignment"). These personnel form the "beat team," which is responsible for leading community policing and problem-solving efforts in that beat, under the leadership of a designated "beat team leader."**

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[25] Arizona State University, Center for Problem-Oriented Policing, About Us, The SARA Model, https://popcenter.asu.edu/content/sara-model-0 (last visited Sept. 12, 2023).

[26] The National Criminal Justice Training Center has a resource describing how the SARA Model can apply to tribal agencies, available at https://ncjtc-static.fvtc.edu/Resources/RS00002738.pdf (last accessed Sept. 19, 2023).

Currently, SRPD patrol officers are generally assigned to a different police beat every week. In other words, an officer may work in the area around the Talking Stick Resort this week, then be assigned to Lehi the following week.

Assigning officers to the same beat for an extended period of time gives them the opportunity to develop a deeper understanding of the people, problems, and resources within their assigned beat.27 This, in turn, allows for more regular and meaningful engagement with Community members and more effective problem solving at the neighborhood level. Continuity of beat assignments also fosters a team mentality. Officers working the same beat on different shifts can collaborate more effectively on addressing the problems on their beat.

Beat teams are successful when they have consistent supervision and leadership. That is why it is important for the SRPD to also assign patrol sergeants to consistent beats. That way, the sergeants get to know not only the Community, but also their officers, including their strengths and weaknesses.

Every team needs a leader, and each SRPD beat team should have a sergeant designated as the "beat team leader." Other sergeants would continue to manage individual shifts on the beat. But in addition to their regular shift duties, the beat team leader would also be responsible for overseeing the community policing and problem-solving activities on the beat across all shifts. It is essential that beat team leaders possess the communications and coaching skills to effectively manage their teams and motivate and guide team members. Given their added responsibilities, beat team leaders should be eligible to receive an additional stipend.

Community participation in the beat team is also critical. Wherever possible, the scope of this engagement should go beyond the participation of a small cadre of Community leaders who may purport to speak for the broader community. The beat team should work to include a broad representation of the community and to hear from all voices.[28]

> **Recommendation 1(e). The Department should establish a formal problem-solving process on each police beat. This will entail regular meetings among the police beat team and Community stakeholders, analysis of crime trends within the beat, and the use of the SARA Model to**

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[27] Yucel Ors and Nicole DuPuis, *National League of Cities, City Officials Guide to Policing in the 21st Century* (2016).

[28] Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* (2019).

identify and address priority crime and disorder problems.

For problem solving to be effective, there must be a commitment by all parties to collaborate and a system in place for them to follow. It is important for police and community to establish and follow a regular methodology for how problem-solving will be implemented.

Once the beat teams have been established and police and Community stakeholders trained, each SRPD police beat should establish a regular schedule of "beat meetings." (Hosting monthly meetings may be optimal.) The primary purpose of these meetings is to bring together the police beat team and Community stakeholders to engage in problem-solving.

The SRPD's crime analysts will play a key role in supporting beat-level problem solving. In advance of each beat meeting, the analysts will be expected to produce reports showing crime, calls for service, and other relevant information on that beat. This information will help identify crime hot spots, Community concerns (what issues they're calling the police about), and other important factors impacting public safety.

Armed with this analytical data and using the SARA Model, the beat meetings will be the forum for identifying and prioritizing the problems on that police beat, analyzing those priority problems, and developing strategies to address them. Depending on the nature of the problems being worked on, the beat teams may need to draw on a range of partners, including specialized SRPD units (drug enforcement or traffic safety, for example), other government agencies, faith leaders, and others. That is why it is important for the SRPD to develop strong partnerships with these organizational entities, as well as individual residents.

Problem-solving strategies and activities should be documented in written "beat plans." The beat meetings are an opportunity to update those plans, review progress on problem-solving strategies that are underway, and to celebrate successful outcomes. The beat team can also use the beat meetings to share other information of interest to the Community, including new SRPD initiatives, crime prevention information, etc. (see Recommendation 2, below).

Ensuring that beat meetings occur and are productive will be a key responsibility of the beat team leader (the sergeant assigned to lead community policing and problem solving on that beat). The beat team leader will secure a location for the meeting, make sure appropriate members of the beat team and other SRPD units attend, advertise the meeting broadly in the Community, develop the agenda, lead the meeting, and keep it on track. In the SRPMIC, there are regular District Council meetings hosted in each community. During the initial phase, SRPD could use those meetings as an opportunity to garner interest within the

Community while the Department builds out its own beat meetings.

Progress on addressing problems at the beat level should feed into the SRPD's broader performance tracking and management systems. Lieutenants and Commanders should monitor problem-solving progress on the individual beats, identify resources and other needs, and provide coaching and support to the beat teams.

> **Recommendation 1(f). As the SRPD rolls out its expanded philosophy of community policing, the Department should consider partnering with outside experts to assist with program design, implementation, and evaluation.**

Establishing or dramatically expanding a department-wide philosophy of community policing is a heavy lift for any police agency. Policies must be written or updated. Training must be developed and delivered. Implementation systems need to be put in place. Ongoing efforts need to be evaluated and updated as needed. And all this needs to take place as the police agency is carrying out its day-to-day work of answering calls for service and investigating crime.

The SRPD would be well-served to find a trusted partner to assist with its community policing design, implementation, and assessment efforts. One local resource, the Center for Problem-Oriented Policing at Arizona State University ("the POP Center"), may be able to provide valuable assistance to the SRPD.[29] The POP Center was founded as a private non-profit organization in 2002. Its mission is to "advance the concept and practice of problem-oriented policing in open and democratic societies...by making readily accessible information about ways in which police can effectively and equitably address specific crime and disorder problems."[30] The organization and its Director, Michael Scott (a professor at ASU and former police officer and police chief), are highly regarded.

Even if the POP Center cannot provide direct assistance to the SRPD, it has a wealth of information on its website and could possibly make recommendations of other potential partners. In addition, the COPS Office offers resources, training, and technical assistance for tribal agencies looking to implement or

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[29] *See* University of Arizona, Center for Problem Oriented Policing, https://popcenter.asu.edu/ (last visited Sept. 19, 2023).

[30] *Id.*

enhance community policing.[31] The National Criminal Justice Training Center also maintains extensive resources and training on community policing in tribal communities.[32] The SRPD should ensure it is taking advantage of all these resources.

Recommendation 2. To enhance its partnerships with the Community, the SRPD should provide more information, through additional communications channels, to Community members.

By holding regular beat meetings (see Recommendation 1(e)), the SRPD will increase the flow of information to members of the Community. But not everyone will want to get involved in the beat meetings or neighborhood-based problem solving, and there is important information that the SRPD should be getting out to the entire Community. This includes information about emerging crime trends, crime prevention safety tips, new SRPD programs, upcoming events, and profiles of newly hired or promoted personnel.

Therefore, the SRPD should make a concerted effort to increase the amount of information it provides to the Community and to reach Community members through a broader array of communications channels.

Specifically, the SRPD should:

- Expand its communications portfolio to include **additional social media platforms** beyond Facebook. Special attention should be focused on those apps that are typically used by younger Community members. The SRPD should use these social media platforms to provide a wide range of public safety information (not just announcements of individual Community events), and the Department should make an effort to increase two-way engagement on social media.

- Make greater use of its **website** to post relevant SRPD news and updated information. Right now, it appears the SRPD does not have direct control over the content on its website, and instead must rely on other Community government entities to maintain the site. To maintain a dynamic website, SRPD personnel need to have the ability to add and update content directly and quickly. To promote transparency and

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[31] See U.S. Department of Justice, Office of Community Oriented Policing Services, Tribal Policing, https://cops.usdoj.gov/tribalpolicing (last visited Sept. 19, 2023).

[32] See National Criminal Justice Training Center, Resources, https://ncjtc.fvtc.edu/search-results?content=Resources (last visited Sept. 19, 2023).

Community understanding of SRPD operations, the Department should publish its operational orders on the website (excluding any sensitive material that may compromise safety or operations).

- Provide all police personnel with **personalized business cards** they can hand out to Community members and others. It is especially important that beat team members (officers and sergeants) carry and use personalized business cards. The business cards can also include links to a Community survey (see Recommendation 3) and how to file a complaint or compliment about an employee (see Recommendation 5(b)).

- Publish a regular public safety column in every issue of the *O'odham Action News* and place additional stories, as warranted, in the newspaper. For example, the Department could publish the upcoming schedule of beat team meetings and profile problem-solving success stories. The *O'Odham Action News* is a trusted source of information for many in the Community, and the SRPD should have a greater presence there.

- Get on the agendas of **District Council meetings** and other appropriate venues to provide in-person updates on SRPD operations and activities on individual police beats.

- Consider creating regular **mail and/or email communications** to key Community stakeholders, including Elders. Online platforms can provide regular and real-time informational updates to subscribers.

- Publish an **annual report** that includes information about the SRPD, crime in the Community, and Department efforts to address it. This annual report could also include information about internal affairs activity (see Recommendation 10), traffic stops and arrests (see Recommendation 13), and officers' use of force (see Recommendation 19).

Recommendation 3. The SRPD should routinely collect feedback from the Community.

An important element of community policing is for police agencies to know how their community feels about them and the services they provide. In addition to providing more information *to* the Community, the SRPD should collect feedback, in a consistent and systematic manner, *from* the Community.

There are various methods the Department could consider for gathering feedback, including:

- Regular Community-wide surveys. "[S]urveys may collect information

about crime and safety concerns, the effectiveness of current safety programs, and the types of safety programming respondents would like to see."[33]

- Follow-ups with individuals who have had recent contact with the police. "Some agencies distribute targeted surveys to victims of crime or those who have been involved with the criminal justice system to inquire about their experience and what processes could be improved."[34] Online tools and platforms are available that allow police agencies to collect and analyze this feedback easily and efficiently.
- QR code or web link on SPRD business cards that direct people to a survey.
- "Comment boxes" on the SRPD website and in Police and Community government facilities.
- In-person feedback collected during beat meetings, Community events, and other encounters.

This information not only will help to measure Community satisfaction with the police, but also serve to identify Community concerns and opportunities for improvement in areas such as policies, programs, and training.

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[33] U.S. Department of Justice, Office of Community Oriented Policing Services and International Association of Chiefs of Police, *Promising Practice in Tribal Community Policing.* Pg 12. (Dec. 2016), https://www.theiacp.org/sites/default/files/all/t/TribalCommunityPolicing.pdf.

[34] *Id.*

II. ACCOUNTABILITY

Ensuring the police are held accountable for fulfilling their responsibilities and meeting performance expectations in a fair and equitable manner, and that police departments identify and address misconduct when it occurs, have become defining issues for police agencies across the country.[35] Especially given the proliferation of body-worn cameras and mobile phone video capabilities over the past decade, numerous videos have documented instances of excessive use of force, the mistreatment of individuals during police encounters, and other misconduct or deficient performance.

Tribal police departments are not immune from these dynamics of community mistrust. This was evident from interviews with SRPMIC members, along with responses to the Community-wide survey, that were part of the 21CP assessment. Many Community members expressed distrust of individual officers and the SRPD

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[35] *See generally* Darrel W. Stephens, *Police Discipline: A Case for Change* (2011).

in general, which can undermine public safety. According to the COPS Office, "Trust of tribal elders, the tribal council, and community members is essential to gaining and keeping community and tribal leadership's support, just as the trust of officers and employees is essential to maintaining morale and loyalty."[36]

It is critical that communities have the mechanisms in place to ensure officers are held accountable for their behavior. These include a clear and transparent system for accepting complaints from individuals; police internal affairs systems that thoroughly and fairly investigate complaints against police officers; disciplinary systems to hold accountable those who violate department policies; civilian oversight bodies that give the community a role in the process; as well as the potential for criminal prosecution, civil lawsuits and public pressure.[37]

Our review found that the SRPMIC has many of the basic building blocks in place for ensuring police accountability,[38] but that some key systems and processes need improvement. Three key areas, in particular, need attention: (1) the citizen complaint process; (2) the internal disciplinary system; and (3) civilian oversight.

2.   A. Citizen Complaint Process

The process for accepting and investigating citizen complaints about SRPD officers is described in Operations Order 3.19 ("Misconduct Investigations," effective October 2016.[39] Per that policy, the basic steps of the complaint process are:

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[36] U.S. Department of Justice, Office of Community Oriented Policing Services and International Association of Chiefs of Police, *Promising Practice in Tribal Community Policing.* Pg. 11. (Dec. 2016), https://www.theiacp.org/sites/default/files/all/t/TribalCommunityPolicing.pdf.

[37] Ensuring police are held accountable involves more than these areas. It begins with a hiring and selection process that weeds out unsuitable applicants and brings in those who exhibit characteristics important to the job. Officers must receive quality training that gives them the skills required to perform effectively and includes clear expectations on acceptable behavior. Policies and procedures must be established and enforced to properly guide officers in carrying out their responsibilities in an acceptable manner. Appropriate supervision, performance review and discipline are also key aspects of establishing a culture of accountability in police organizations.

[38] Faye C. Elkins, U.S. Department of Justice, Office of Community Oriented Policing Services, "Evaluating the Complaint Process with a Checklist of Best Practices." *Community Policing Dispatch* (Apr. 2022), https://cops.usdoj.gov/html/dispatch/04-2022/complaint_process.html.

[39] Although not specifically identified in the order, misconduct investigations are initiated based on both complaints from citizens and internally by conduct observed by supervisory personnel. Examples of internally initiated investigations include use of force, improper vehicle/equipment handling, unsatisfactory performance, observations from body-worn camera review, missing or late to work and other types of misconduct.

- Individuals may file a complaint against any member of the SRPD in person, over the telephone, or by mail. The SRPD recommends that complaints be filed with the involved employee's supervisor, although complaints can also be filed directly with the SRPD's Professional Services Bureau (PSB).

- Once the SRPD receives a complaint, it is referred to an on-duty supervisor who is responsible for contacting the complainant to discuss the matter and determine if it meets the definitions set forth in Operations Order 3.19.[40] Complainants must then complete and sign the Notification of Citizen Complaint form.

- The investigation is conducted by the employee's supervisor or, in the case of more serious allegations, by the PSB. Of the 53 citizen complaints between 2018 and 2022, SRPD data on complaints, provided to 21CP, indicates that 25 (47%) were conducted by the employee's supervisor. In all investigations, PSB is responsible for issuing case numbers, tracking the progress of the investigation, and review.

- The investigator interviews witnesses and other parties, as well as the involved employee. The investigator also collects, reviews, and analyzes all data relevant to the case, including police reports, video and audio recordings, computer system entries, etc.

- The investigator evaluates the facts of the investigation and makes a finding on the allegation(s) of misconduct. This finding is reviewed by the investigator's chain of command.

- At the conclusion of the investigation, the SRPD sends the complainant a Notification of Findings letter by registered mail.

There are five possible findings in a citizen complaint investigation:

- **Unfounded.** The reported misconduct did not occur or did not occur as alleged.

- **Exonerated.** The incident occurred, but the conduct was lawful and proper.

- **Unresolved.** There is insufficient evidence to either prove or disprove the

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[40] Salt River Police Department. *Operations and Directives Orders*. Operations Order 3.18, Section 2: Definitions, pg. 1.

allegation. (Other agencies often use the term "Not Sustained.")

- **Sustained.** The allegation is supported by sufficient evidence to justify a reasonable conclusion that the alleged misconduct occurred.

- **Administrative closure.** Any cases whose outcome does not fit in the other four categories. (For example, if a complainant decides not to follow through on their complaint, the complaint investigation would be administratively closed.)

For allegations that are sustained, the chief of police determines what discipline, if any, should be imposed on the employee.

In interviews and focus groups with Community members, 21CP found that many do not know how to file a complaint and are not familiar with how the complaint process works. Some Community members told 21CP the following:

"I do not know how to make a complaint."

"I tried to make a complaint but when I went to the police department to do it in person, there was no one there that could take the report except the officer I was complaining about."

"I don't know how to make a complaint directly to the SRPD. There was a law enforcement committee, but it never amounted to much.... Some people were able to make complaints there, but nothing happened with the complaints."

"I know how to file [a complaint], but often the lower ranking officers that were supposed to take [the report] wouldn't do it, so often I had to make the complaints right to the Captain and the Chief myself."

Others said they did not trust the process because they did not think the SRPD would fairly and objectively investigate its own members. Some Community members said they felt uncomfortable or intimidated filing a complaint in person or even over the phone, because the employee they were complaining about might be involved in the process. Here are some other comments 21CP heard from Community members:

"There is no transparency, no trust and for sure no communication.... We hear a lot of the inside complaints the employees have. It always seems to be the administration caus[ing] it.... There has to be a police commission that can freely look into problems without the tribal council interfering on behalf of the police department."

"The lack of transparency creates a lot of strife among [the] Community. We are trying to figure that out internally.... When the [Community] complain[s] to [the] Council, we need a process to see that complaint is investigated."

In some instances, Community members have bypassed the established citizen complaint process and brought their concerns directly to the Council during its regular meetings. However, if the information presented at Council is not forwarded to the SRPD to initiate an investigation, the complaint can easily fall through the cracks. This appears to have happened in some cases.

Some Community members thought that complaints could be filed with the SRPMIC Law Enforcement Commission (LEC). The Commission was created in 2006 to support "the effective, efficient, and objective provision of police and corrections service."[41] On paper, the LEC has the authority to accept complaints from citizens, as well as assist in the completion of the Notification of Citizen Complaint form and engage in other support activities. However, the LEC has been dormant for several years and does not appear to be currently involved in the citizen complaint process. (See Recommendation 11 for more on the Law Enforcement Commission.)

Part of the disconnect appears to be related to the fact that information on how to file a complaint and what to expect once a complaint has been filed is not easily accessible to Community members. Some details about the complaint process are posted on the SRPD and SRPMIC websites, but the information is not readily apparent and there is no search function on either site. On the SRPD website, one must know where to look and then click through several links (the SRPD home page, a "Frequently Asked Questions" page, and the Professional Standards Bureau page) to find the relevant information.[42] Further, there is no opportunity on the SRPD website to initiate a complaint online, and it does not appear that SRPD members routinely carry complaint forms or other information that can be handed out to members of the public.

3. *Statistical Snapshot: Citizen Complaint Process*

Between 2018 and 2022, the SRPD averaged 10 citizen complaint investigations a

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[41] Salt River Pima-Maricopa Indian Community, Community, SRPMIC Law Enforcement Commission, www.srpmic-nsn.gov/community/lec/ (last visited Sept. 19, 2023).

[42] *See* Salt River Pima-Maricopa Indian Community, Government, Salt River Police Department, Professional Standards Bureau, https://www.srpmic-nsn.gov/government/srpd/psb/ (last visited Sept. 19, 2023).

year, with a low of 6 in 2020 and a high of 14 in 2022.[43] The SRPD sustained 13% of the citizen complaint investigations, as Table 1 inventories.

Table 1. Citizen Complaint Investigation Outcomes

	2018	2019	2020	2021	2022	Total (%)
Sustained	1			4	2	7 (13%)
Unfounded	4	5	2	3	3	17 (32%)
Exonerated	2	3	4	6		15 (28%)
Unresolved	1					1 (1%)
Administrative Closure	2	2			9	13 (25%)
Total	10	10	6	13	14	53

Data is from the SRPD Professional Standards Bureau

There are no national benchmarks regarding the number of complaints received by police agencies or the outcomes of investigations. Adding to the benchmarking difficulty is that departments use different terms and definitions of outcomes. For example, the SRPD's use of "Administrative Closure"[44] as an outcome is uncommon; however, in New Jersey 18.4% of citizen complaints in 2021 resulted in an administrative closure. In the SRPD, an administrative closure is used when the outcome does not fit any of the other categories.

Between 2018 and 2022, the most common type of citizen complaint to SRPD was "unbecoming conduct" (26%), followed by courtesy (17%), honesty (15%), and excessive force (13%).

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[43] Citizen Complaint data was obtained from reports prepared by the Professional Service Bureau from IAPro, the system the SRPD uses to manage and track complaints.

[44] State of New Jersey, Department of Law & Public Safety, Statewide Internal Affairs Statistics (2021), www.njoag.gov/iadata/ (last accessed Sept. 19, 2023).

Table 2. Types of Citizen Complaints

	2018	2019	2020	2021	2022	Total (%)
Courtesy	6	3				9 (17%)
Excessive Force	1	3	2	1		7 (13%)
Unbecoming Conduct	1	2	4	4	3	14 (26%)
SRPMIC Policy				5	1	6 (11%)
Vehicle Use		1		3	2	6 (11%)
Improper Search		1				1 (2%)
Honesty/False Statement					8*	8 (15%)
Unsatisfactory Performance	2					2 (4%)
Total	10	10	6	13	14	53

Data is from the SRPD Professional Standards Bureau
* Seven of these cases were from the same incident and were administratively closed.

A frequently expressed concern, among community members and police officers nationally, is the time it takes to complete a citizen complaint investigation.[45] Per Operations Order 3.19, the SRPD expects all misconduct investigations to be completed within 30 working days. This is a good standard but challenging to meet at times. Obviously, more complex investigations will usually take longer to complete.

Between 2018 and 2022, nearly 50 percent of SRPD citizen complaint investigations were completed within 30 days of their initiation, and 69% were completed within 120 days (Table 3). (Many of the investigations that took longer than 120 days were the result of the investigator failing to enter a closure date in the IAPro System, which the Department uses to track and manage complaints against officers.)

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[45] Darrel W. Stephens, Ellen Scrivner, and Josie F. Cambareri, *Civilian Oversight of the Police in Major Cities* (2018).

Again, there are no national benchmarks for how quickly citizen complaint investigations should be completed. However, in the state of New Jersey, which posts investigative information on its website, the average time to complete an investigation in 2021 was 76 days.[46]

Table 3. Time to Complete Citizen Complaint Investigations

Days	2018	2019	2020	2021	2022	Total (%)
<30	4	5		6	11	26 (50%)
30–60	4			1	3	8 (15%)
60–120	1	1				2 (4%)
120–365	1	1	2	5		9 (17%)
>365		2	4	1		7 (14%)
Total	10	10	6	13	14	53

Data is from the SRPD Professional Standards Bureau
*Note: The time the investigation was completed was not recorded in one case.

Recommendation 4. The SRPD should create a specific order – separate from Operations Order 3.19 – that spells out the process for filing citizen complaints.

Currently, the citizen complaint process is detailed in Operations Order 3.19, a broad policy that also covers the internal disciplinary process and the SRPMIC Law Enforcement Commission. To provide greater clarity, the sections of the current order pertaining to the citizen complaint process should be moved to a new, stand-alone order.

The new order should spell out in clear terms how individuals can initiate a complaint about an SRPD employee and how the investigative process works. Once the new order is developed, the Department should issue a Training Brief to ensure that all members are aware of the citizen complaint process and can explain it to members of the public who ask them about it.

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[46] State of New Jersey, Department of Law & Public Safety, Statewide Internal Affairs Statistics (2021), www.njoag.gov/iadata/ (last accessed Sept. 19, 2023).

In addition, the new order should be posted on the SRPD website to help ensure that Community members can gain greater understanding of the process (see Recommendation 2).

Recommendation 5. The SRPD should provide the Community with clear, concise information about the citizen complaint process and make it easy for individuals to file a complaint (or compliment) about an officer. This level of transparency can help enhance the Community's understanding of and trust in the process.

As noted above, many Community members told 21CP interviewers that they do not file complaints about SRPD employees either because they do not know or understand the process, or they do not trust that the process will be fair and objective. To address these concerns, the SRPD should take the following steps.

> **Recommendation 5(a). SRPD should produce brochures and online materials that clearly explain the citizen complaint process and forms for filing complaints and/or commendations.**

Written materials explaining the complaint and commendation process should be easy to read and understand and not contain bureaucratic jargon. They should be made available at government buildings and other Community venues, as well as online. In addition, the Department should promote the materials through its various communications channels (see Recommendation 2) and through District Council meetings or a special town hall meeting to address this change in policing practice.

> **Recommendation 5(b). SRPD should ensure its employees have the citizen complaint brochures and forms and that employees provide the information to individuals who ask about the complaint process.**

It is especially important for patrol officers and sergeants, as well as other Community-facing employees, to have these materials readily available and to provide them to individuals who inquire about filing a complaint. In addition, employees' business cards (see Recommendation 3) could include links to information about the citizen complaint process.

> **Recommendation 5(c). SRPD should develop an automated process for filing a complaint or compliment online, through a secure link on the SRPD website.**

The current process for individuals to file a complaint – in person, over the phone, or via mail – is cumbersome and inefficient. At the same time, some Community members said they feel uncomfortable or intimidated filing a complaint in person or over the phone. Adding an online option for filing a complaint will make it

easier and less daunting for some Community members. The online form will also make the investigative process more efficient by capturing basic information about the complaint and the complainant in an automated fashion.

> **Recommendation 5(d). SRPD should create a prominent, easy-to locate link on the SRPD home page so the public can easily access the citizen complaint information.**

Right now, finding information about the citizen complaint process on the SRPD website is difficult; it requires knowing where to look and clicking through several links to get there. The Department should create a link on its homepage that takes individuals directly to a page that provides clear information about the citizen complaint process and includes a link to the complaint form (see Recommendation 5(c)). Again, this online information should be promoted through the SRPD's communications channels (see Recommendation 2).

> **Recommendation 5(e). All complaints about SRPD employees raised   at Council meetings should immediately be referred to the SRPD complaint process so that the complaints can be quickly and thoroughly investigated.**

As previously noted, some Community members bring complaints about SRPD employees directly to the Council at its regularly scheduled meetings. While Community members may think their complaint has been registered and will be investigated, unless the complaint is forwarded to the SRPD, it may never be logged and investigated.

The Council should establish a formal and consistent response to complaints about SRPD employees that are raised at Council meetings. This response would direct Community members either to an on-site representative (such as the Assistant Community Manager) who could help initiate the complaint process or to the information and forms on the SRPD website. The Council should have business cards or flyers containing this information printed and available at all meetings.

Recommendation 6. The SRPD should revise the Notification of Citizen Complaint form by removing existing language about false reports.

Once the SRPD receives a complaint from a Community member, an on-duty supervisor contacts the complainant to discuss the matter. If the complaint meets the criteria set forth in SRPD policy, then the complainant must complete and sign the Notification of Citizen Complaint form. Currently, this form contains the following statement:

> *"NOTE: Making a false or fraudulent or unfounded report or statement or knowingly misrepresenting a fact or misleading Police, is a violation of*

the Salt River Code of Ordinances under section 6-38 (False reporting to law enforcement.)"

Although this statement is technically accurate, it could be interpreted as intimidating or threatening and could have a chilling effect on those wishing to file a complaint. The U.S. Department of Justice has recommended that "[u]nless required by law, no threats or warnings of prosecution or potential prosecution for filing a false complaint should be made orally or in writing to a complainant or potential complainant."[47] Tribes such as the Penobscot Nation have eliminated similar language in the last decade to ensure that the community complaints will be believed and acted fairly upon.[48]

The SRPD should strike the above note from its Notification of Citizen Complaint form. As an alternative, the investigator assigned to review the complaint could verbally relay to the complainant, in a straightforward, non-threatening manner, that filing false or unfounded reports is a violation of SRPMIC ordinance. Alternately, if the Notification of Citizen Complaint must remain as it does for all other AZ Post-certified agencies then 21CP recommends softening the languagesimilar to what the Phoenix Police Department has placed on their website, which reads:

Responsibility: Ours and Yours

The Phoenix Police Department takes all citizen complaints against our employees seriously. It is our responsibility to actively pursue investigations into employee misconduct. For this reason, you have the responsibility to ensure that your complaint is based on fact and that you have provided us with all of these facts to the best of your ability.

Per state law, Arizona Revised Statutes 38-1120, effective September 29, 2021, before an Arizona law enforcement agency accepts a complaint made against a peace officer, the law enforcement agency must provide the person making the complaint with the following mandatory notice:

"Pursuant to section 13-2907.01, Arizona Revised Statutes, it is a class 1 misdemeanor to knowingly make to a law enforcement agency a

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[47] United States Department of Justice, Office of Community Oriented Policing Services, Standards and Guidelines for Internal Affairs: Recommendations from a Community of Practice. Pg. 17. (2008), https://portal.cops.usdoj.gov/resourcecenter/ric/Publications/cops-p164-pub.pdf

[48] U.S. Department of Justice, Office of Community Oriented Policing Services and International Association of Chiefs of Police,. Promising Practice in Tribal Community Policing (Dec. 2016). https://www.theiacp.org/sites/default/files/all/t/TribalCommunityPolicing.pdf

false, fraudulent or unfounded report or statement or to knowingly misrepresent a fact for the purpose of interfering with the orderly operation of a law enforcement agency or misleading a peace officer."

To ensure we comply with state law, supervisors and other department personnel accepting complaints against sworn staff must provide the above stated notice to the complainant(s). When possible, this notice should be captured on body worn cameras or during audio recorded interviews with complainant(s), and will be included in any administrative investigation.[49]

Recommendation 7. In the follow-up notification to individuals who have filed a complaint, the SRPD should provide a more thorough explanation of the steps the Department took and more clearly state the outcome of the investigation.

Once the investigation of a citizen complaint has been completed, the SRPD's Professional Services Bureau notifies the complainant through a certified letter. The SRPD website indicates that complainants "will be advised of the investigation's findings and whether disciplinary action will be taken."[50] However, a 21CP review of some sample complainant notification letters revealed that they typically provide very little information about what the Department did other than "investigate." In addition, complainants are informed that "all actions including any discipline by the Salt River Police Department is considered confidential and will not be released."

Although it is understandable that some personnel information needs to remain confidential, the SRPD could provide complainants with some basic process and outcome information that would not jeopardize the privacy of its employees. For example, the Hallandale Beach, FL Police Department pledges to do the following at the conclusion of an internal investigation:

After a final review with the Chief of Police and his determination of action to be taken is obtained, you will be notified, in writing, of the results of the

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[49] Phoenix, Arizona. Phoenix Police Department. Commendations and Complaints. https://www.phoenix.gov/police/resources-information/commendations-complaints (Last visited Sept. 26, 2023)

[50] Salt River Pima-Maricopa Indian Community. Government, Salt River Police Department, Professional Standards Bureau, https://www.srpmic-nsn.gov/government/srpd/psb/ (last visited Sept. 19, 2023).

investigation, and in non-specific terms, what action was taken by the Department.[51]

4. B. Internal Disciplinary System

In addition to accepting and investigating complaints from citizens, the SRPD conducts investigations based on complaints from Department members. These internal complaint investigations are usually initiated when supervisors observe or become aware of misconduct through departmental review processes. Vehicle crashes involving Department members also initiate an internal complaint investigation. Like citizen complaints, internal complaint investigations may be conducted by the employee's supervisor or by the SRPD's Professional Standards Bureau.

The SRPD disciplinary process is guided by various directives: SRPD Operations Order 3.18: Disciplinary Policy; SRPMIC Discipline Policy 2-12; and SRPD Operations Order 3.19: Misconduct Investigations, which contains two sections that address the pre-disciplinary meeting with the employee and the disciplinary meeting.

The SRPD maintains a matrix that provides a framework for making disciplinary decisions by indexing various types or severity of misconduct to specific disciplinary or remedial outcomes. The use of a specific discipline matrix is a best practice nationally.[52] Many police agencies have adopted the approach over the past 15 years to be more transparent and to ensure both fairness and consistency in making disciplinary decisions.

The SRPD disciplinary matrix has seven levels of discipline ranging from level 1, supervisory counseling, to level 7, termination of employment. Policy violations are placed in five classes of misconduct, ranging from the least serious to the most serious, and three steps within each class to provide progressive discipline. The operations order contains several examples of how the matrix should be applied.

5. Statistical Snapshot: Internal Complaint Investigations

Between 2019 and 2022, the SRPD investigated 60 internal complaints (not including vehicle crashes). Forty-five percent of these investigations were sustained; the other 55% had a variety of outcomes, including officers being

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[51] *See* Hallandale Beach, Departments, Police, Citizen Complaints, https://hallandalebeachfl.gov/163/Citizen-Complaints (last visited Sept. 19, 2023).

[52] Samuel Walker, *The Discipline Matrix: An Effective Police Accountability Tool?*, Conference Report, University of Nebraska at Omaha (2004).

exonerated, the complaint being unfounded or, in the case of vehicle pursuits and weapons discharges at animals, the officers were found to have acted "within policy" (Table 4). Of the 33 vehicle crashes investigated between 2019 and 2022, officers were found to be "at fault" in 55 percent of the cases.

It is typical that internal complaint investigations are sustained at a much higher rate than external citizen complaints, which is the case in the SRPD.

Table 4. Internal Complaint/Misconduct Investigations Outcomes*

	2019	2020	2021	2022	Total (%)
Sustained	11	5	6	5	27 (45%)
Unfounded	3	4	1		8 (13%)
Exonerated		3			3 (5%)
Unresolved		2	2	1	5 (8%)
Administrative Closure	3	2		4	9 (15%)
Policy Failure		1			1 (2%)
Within Policy	1	1	2	3	7 (12%)
Total	18	18	11	13	60

Vehicle Crashes

	2019	2020	2021	2022	Total
Not at Fault	3	1	5	6	15 (45%)
At Fault	1	1	2	14	18 (55%)
Total	4	2	7	20	33

Data is from the SRPD Professional Standards Bureau
*Does not include Use of Force, Citizen Complaints

6. Statistical Snapshot: Disciplinary Action Taken

In the majority (72%) of the citizen complaint investigations the SRPD conducted between 2019 and 2022, no disciplinary action was taken against the officers. Most of these complaints were deemed to be unfounded, the officers were exonerated, or the case was unresolved. In the six sustained cases, officers received supervisory counseling, written warnings, or informal discipline. In two other cases, the officers were coached.

Table 5. Disciplinary Action in Citizen Complaint Investigations

	2019	2020	2021	2022	Total (%)
No Discipline	9	4	7	1	21 (72%)
Coached			2		2 (7%)
Supervisory Counseling				2	2 (7%)
Written Warning	1		2		3 (10%)
Informal Discipline				1	1 (3%)
Total	10	4	11	4	29

Data is from the SRPD Professional Standards Bureau

Among internal complaint investigations conducted between 2019 and 2022, the SRPD did not impose discipline in 54% of the cases (again, largely because the complaints were unfounded, the officers were exonerated, or the case was unresolved). Some type of discipline was imposed in all the sustained and at-fault cases, as Table 6 details. In 9 percent of the cases where discipline was imposed, the officers either resigned or their employment was terminated.

Table 6. Disciplinary Action in Internal Complaint/Misconduct Investigations*

	2019	2020	2021	2022	Total (%)
No Discipline	11	15	11	13	50 (54%)
Informal Discipline	2				2 (3%)
Supervisory Counseling	3			5	8 (9%)
Written Warning/ Counseling	2	3		4	9 (10%)
Remedial Training				10	10 (11%)
Demotion	1				1 (1%)
Suspension W/O Pay				1	5 (5%)
Resigned	3	1			6 (6%)
Termination		1	1		2 (3%)
Total	22	20	18	33	93

Data is from the SRPD Professional Standards Bureau
*Does not include Use of Force, Citizen Complaints

Recommendation 8. SRPD should revise Operations Order 3.18: Discipline Policies and Procedures to specifically inventory the actual steps involved in the administration of discipline.

Operations Order 3.18 addresses the causes for disciplinary action, responsibilities of employees and supervisors, the application of the disciplinary matrix, and other helpful information. However, the order does not spell out the actual steps for administering discipline. This is a significant omission that can and should be easily and quickly remedied.

In addition, some steps in the disciplinary process are addressed in other orders. For example, the pre-disciplinary meeting is described in Operations Order 3.19: Misconduct Investigations. That information should instead be incorporated into Operations Order 3.18.

> **Recommendation 8(a). An employee's chain of command should have a greater role in the disciplinary decision-making process by making recommendations to the Chief of Police about disciplinary action.**

In the SRPD, the Chief is the person ultimately responsible for making disciplinary decisions. The employee's immediate supervisor and chain of command are not closely involved in the final determination of discipline. This is not considered a best practice nationally.

In most police agencies, the employee's supervisor and chain of command make recommendations to the chief, who then has the responsibility for the final decision about discipline. That process contributes to accountability at all levels of the organization and provides an opportunity for supervisory and management personnel to gain experience in the critical area of reviewing and administering discipline. The U.S. Department of Justice COPS Office Standards and Guidelines for Internal Affairs notes "[t]he value of considering commanding officers' options":

> The recommendations of commanding officers and their chain-of-command superiors regarding the adjudications of cases and the actions taken regarding the accused employees should be considered by the final deciding authority.[53]

Many police departments employ processes that involve the chain of command in the adjudicatory process. For example, the Charlotte-Mecklenburg, North Carolina Police Department (CMPD) convenes a "chain of command" board that reviews the internal affairs investigation, determines the finding, and recommends disciplinary action to the chief.

Recommendation 9. The SRPD should revise Operations Order 3.19: Misconduct Investigations to provide greater clarity about the process for conducting misconduct investigations; sections not specifically related to misconduct investigations should be removed and addressed in separate orders.

Operations Order 3.19 is currently 20 pages long with the addendum. It currently contains sections not specifically related to misconduct investigations, such as the citizen complaint process and disciplinary policy and procedures. To make Operations Order 3.19 more focused, these sections should be removed and addressed in separate orders. For example:

- Section 8 provides instructions for the processing of citizen complaints. That section should be remov ed, and a separate order that addresses the entire citizen complaint process should be developed (see

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[53] U.S. Department of Justice, Office of Community Oriented Policing, *Standards and Guidelines for Internal Affairs: Recommendations from a Community of Practice* (2008).

Recommendation 4).

- Section 9 addresses the pre-disciplinary meeting. That section should be removed and incorporated into Operations Order 3.18: Disciplinary Policies and Procedures (see Recommendation 8).

- Section 12, describing the Law Enforcement Commission, should be removed, and information describing the civilian oversight process should be addressed in a separate order (see Recommendation 11).

In addition, Operations Order 3.19 contains some conflicting statements that should be clarified, and it is missing important information that should be added. For example:

- The order indicates that the investigation and any discipline are strictly confidential but then includes a statement that upon completion of the investigation, the employee is allowed to talk about it (pages 1-2). This contradiction should be clarified.

- The order makes no reference to the Blue Team/IAPro System, which the SRPD uses to track and manage internal investigations, even though supervisors are expected to enter complaints into the system when they are filed (page 3). Use of Blue Team/IAPro should be spelled out in the Order.

- One part of the Order states that off-duty supervisors are expected to investigate complaints against officers working off-duty under their supervision (page 3), but in another part of the Order (page 13), it is not clear who is responsible for these types of investigations.

- One part of the Order states that a supervisor *may* record the statement of the accused officer or accept a written statement (page 6), but a later part indicates the interview will be recorded (page 11).

Given the importance of misconduct investigations in promoting accountability, and to ensure clarity and consistency in the process, these technical issues in Operations Order: 3.19 should be addressed.

Recommendation 10. The SRPD should publish statistical information on internal investigations, discipline, and commendations and make it available to the Community.

The Department collects and produces high-level, summary information on complaint investigations in the Quarterly At-a-Glance Report. While helpful, this

report does not contain sufficient detail to inform the Community about an area that is critical to developing and maintaining trust. In addition, the At-a-Glance Report does not appear to be widely disseminated within the Department or to the Community (see Recommendation 2).

The Professional Standards Bureau ("PSB") should publish statistical information on external (citizen) and internal complaints, investigative outcomes, disciplinary action, use of force, vehicle pursuits, and assaults on officers. Information on departmental commendations and other awards that employees receive should also be published. This information could be provided as a stand-alone report or as part of the SRPD's annual report to the Community (see Recommendation 2).

The PSB report would not include specific personnel information that is protected from public disclosure. Rather, the report would provide statistical summaries that will help the Community better understand the complaint investigation and disciplinary process. The report should also include information on the process for Community members to file complaints or commend an officer. For examples of these types of reports, see Scottsdale, AZ Police Department,[54] Ft. Myers, FL Police Department[55], Charleston, SC Police Department[56], and Yorkville, IL Police Department.[57]

7. C.   Civilian Oversight

Civilian oversight of law enforcement has long been a topic of analysis and debate nationally.[58] One response to the erosion in public trust in police discussed above has been the creation or expansion of civilian oversight boards, which are designed to give the community a stronger role in the review and

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[54] Scottsdale Police Department. Internal Affairs and Activities Report. Scottsdale, AZ. www.scottsdaleaz.gov/Assets/ScottsdaleAZ/Police/2022-internal-affairs-activities-review-report.pdf.

[54] Fort Myers Police Department. Internal Affairs Report. Fort Myers, FL www.fmpolice.com/DocumentCenter/View/1463/2021-Interal-Affairs-Annual-Report

[56] Charleston Police Department. Office of Internal Affairs Annual Report. Charleston, SC. www.charleston-sc.gov/DocumentCenter/View/34486/2022-OIA-Annual-Report

[57] Yorkville Police Department. *Transparency and Accountability* page. Yorkville, IL. www.yorkville.il.us/788/Police-Transparency-Accountability

[58] Emily Washburn, "America Less Confident in the Police Than Ever Before: A Look at the Numbers." *Forbes* (Feb. 3, 2023), https://www.forbes.com/sites/emilywashburn/2023/02/03/america-less-confident-in-police-than-ever-before-a-look-at-the-numbers/?sh=7e2d28776afb.

oversight of the police.[59]

The President's Task Force on 21st Century Policing emphasized the importance civilian oversight in their Recommendation 2.8:

> Some form of civilian oversight of law enforcement is important in order to strengthen trust with the community. Every community should define the appropriate form and structure of civilian oversight to meet the needs of that community.[60]

As of 2021, more than 160 communities have some type of civilian oversight and another 130 were trying to develop civilian oversight approaches.[61] Since the early 1960s, a variety of approaches to civilian oversight have been developed in communities across the United States. Although each jurisdiction has unique characteristics in their oversight models and some have hybrid approaches, the National Association for Civilian Oversight of Law Enforcement (NACOLE) has identified three major categories of civilian oversight:

- **Investigation-Focused Model.** The civilian oversight body conducts independent investigations of officer misconduct allegations.

- **Review-Focused Model.** The civilian oversight body reviews the quality of completed internal affairs investigations conducted by the police.

- **Auditor/Monitor-Focused Model.** This model encompasses an inspector general function, audit processes, and review of complaint investigations.[62]

According to a 2017 Major Cities Chiefs Association (MCCA) survey of the largest cities in the United States and Canada, the Review-Focused Model is the most frequently used. That was followed by the Investigation-Focused Model, a hybrid

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[59] Sharon Fairley, "Survey Says: The Development of Civilian Oversight of Law Enforcement Skyrockets in the Wake of George Floyd's Killing," 31 *S. Cal. Rev. L. & Soc. Just.* 283 (2022).

[60] *Final Report of the President's Task Force on 21st Century Policing.* Pg. 26. (2015), www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf.

[61] N. Dungca and J. Abelson, "When Communities Try to Hold Police Accountable, Law Enforcement Fights Back," *Washington Post* (Apr. 7, 2021), www.washingtonpost.com/investigations/interactive/2021/civilian-oversight-police-accountability/.

[62] National Association for the Oversight of Law Enforcement, Models of Civilian Oversight of Law Enforcement Agencies, https://www.nacole.org/models_of_oversight (last visited Sept. 19, 2023).

approach, and the Auditor Model.[63] The hybrid approach consists of a combination of models – for example, a review focus with an auditor function. Whatever approach to civilian oversight is selected needs to be tailored to the needs of the community.

Tribal agencies were among the early adopters of community oversight, with "civilian oversight systems … more prevalent in Indian Country than among police agencies in the non-Indian community."[64] The structure of tribal police oversight boards varies widely, in terms of composition, jurisdiction, and authority.

The SRPMIC Council established a Law Enforcement Commission ("LEC") in 2006 for the purpose of aiding "in the effective, efficient, and objective provision of police and corrections services…."[65] The LEC has the authority to accept complaints from citizens, assist in the completion of the Notification of Citizen Complaint form, inquire into the nature of the complaint, make recommendations to the Chief on possible solutions to the matter, and communicate non-confidential information to the complainant.

In recent years, however, the LEC has become dormant. The LEC has eight commissioner positions – four of which are currently vacant.[66] The SRPMIC Council specifically asked 21CP to review the LEC and provide recommendations for civilian oversight.

Recommendation 11. The SRPMIC should discontinue use of the Law Enforcement Commission and replace it with a hybrid approach to civilian oversight that includes an Inspector General and a "Review-Focused Model."

The current LEC has not been functional for several years. Half of the current Commission seats are vacant. In general, Community members do not seem to know details about the LEC, understand its mission and function, know how to utilize its services, or have trust in the LEC. This is evident by the fact that many individuals who want to make a complaint against an SRPD employee bypass the LEC (and the Police Department) and instead go straight to the Council (see Recommendation 5(c)). A new, hybrid model would provide the SRPMIC the

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[63] Darrel W. Stephens, Ellen Scrivner, and Josie F. Cambareri, *Civilian Oversight of the Police in Major Cities* (2018).

[64] Eileen Luna-Firebaugh, *Tribal Policing: Asserting Sovereignty, Seeking Justice.* Pg. 90. (2007).

[65] Salt River Pima-Maricopa Indian Community, Community, SRPMIC Law Enforcement Commission, www.srpmic-nsn.gov/community/lec/ (last visited Sept. 19, 2023).

[66] *Id.*

opportunity to address Community concerns about SRPD operations and employee conduct in a more efficient and effective manner.

The City of Fresno, California uses a hybrid model of civilian oversight that may be instructive to the SRPMIC. Fresno maintains an Office of Independent Review ("OIR") that reports to the City Manager. The OIR is staffed by an auditor who independently analyzes citizen complaints to ensure they have been thoroughly and fairly investigated. The OIR also reviews various units of the police department to ensure compliance with policy, procedure, and best practice.[67]

Fresno also has a Citizens Public Safety Advisory Board. Working closely with the OIR, the Board reviews policies and procedures, and receives reports from the OIR on community relations, the results of internal investigations, reviews from a separate officer-involved shooting committee, and information on excessive and unnecessary force investigations. In addition, the Board reviews critical incidents and recommends policy and procedure changes to the OIR. The Fresno hybrid model provides the community with independent oversight and input, while having professional investigations of complaints and regular audits.

Other cities follow similar approaches. Seattle, for example, has three oversight entities: an Inspector General, an Office of Police Accountability, and a Community Police Commission. Within the Office of Police Accountability, a civilian director oversees law enforcement officers that conduct both external and internal complaints.[68]

Given the Community's needs and current dynamics, 21CP recommends a hybrid oversight structure that includes at least two parts: (1) an Inspector General, and (2) a Community Advisory Board. The Inspector General would be responsible for working directly with the board to coordinate and fulfill its oversight responsibilities.

Inspector General. The Inspector General ("IG") would report to the Community Manager or designee. The office would be staffed by the IG and an assistant. The IG would be responsible for overseeing both citizen complaint and internal complaint investigations, which would continue to be conducted by SRPD personnel. Among other responsibilities, the IG would:

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[67] City of Fresno, City Manager, Office of Independent Review, www.fresno.gov/citymanager/office-of-independent-review/ (last visited Sept. 19, 2023).

[68] Seattle.gov, Civilian Oversight, www.seattle.gov/civilian-oversight (Sept. 19, 2023).

- Review the quality of SRPD investigations and return for further investigation any that were found to be incomplete or not thorough;
- Analyze trends in the types of complaints that are received and investigated by the SRPD;
- Conduct audits of SRPD operations, with a focus on traffic stops (see Recommendation 14) and body-worn camera footage (see Recommendation 23); and
- Identify complaints that the Community Advisory Board could review for possible policy changes.

The Inspector General is an approach that some communities have used for a broad range of government functions beyond the police. To this end, the Council may want to consider expanding the role of the IG in the SRPMIC beyond police oversight to include other key government agencies. This could be accomplished by creating deputy IGs to oversee various other identified government functions.

Community Advisory Board. The Community Advisory Board ("CAB") would be a 5- to 7-member body of Community members appointed by the Council. (The current criteria for LEC commissioners could be used for members of the CAB.) The Board would work closely with and be supported by the IG. It would serve in a review and advisory role to the IG and Community on police policies and procedures, citizen complaint investigations, use-of-force investigations, and other matters, as deemed appropriate by the Council.

III.   STOPS, SEARCHES, AND ARRESTS

The Bureau of Justice Statistics reports that, nationally, police had contact with 53.8 million U.S. residents (16 or older) in 2020.[69] Nearly half of those contacts (47%) were initiated by the police in the form of traffic stops, street stops, and other officer-initiated encounters. In a study of over 100 million stops from 21 state patrol and 29 municipal police agencies, the Stanford Open Policing Project found significant racial disparities – and concluded that, in some instances, bias played a role in the stops.[70] The report also found that, in nearly every jurisdiction studied, Black and Hispanic drivers were "searched more often than whites." The Public Policy Institute of California similarly found, in a study of 4 million stops in 2019 conducted by the 15 largest police agencies in California, Black individuals were searched at more than two times the frequency of whites – but that the

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[69] S. Tapp & Elisabeth Davis, U.S. Department of Justice, Bureau of Justice Statistics, *Contacts Between Police and the Public*, 2022.

[70] The Stanford Open Policing Project., Findings, https://openpolicing.stanford.edu/findings/ (last visited Sept. 19, 2023).

searches were *less* likely to find contraband or evidence than whites.[71] Similar trends have been found in several other jurisdictions.

Significant concerns about profiling and bias have led 23 states to adopt laws relating to or requiring police agencies to collect data about their traffic stops, usually including the race and ethnicity of the individuals they stop.[72] Collecting and analyzing data on traffic stops and other police encounters with the public is a best practice that promotes transparency and helps to build trust with the community.

8. A. Overview of Analysis on Stops and Citations, Officer-Initiated Activity, and Arrests

21CP analyzed data on SRPD traffic stops and other self-initiated activity and reviewed the Department's policies and procedures in these areas. The analysis focused on three areas: (1) traffic stops and citations; (2) officer-initiated activity; and (3) arrests.

9. 1. Traffic Stops and Citations

SRPD Operations Order 6.01 provides guidance to officers on Traffic Patrol and Enforcement. Although the Order is generally well written and addresses many key issues, it has two notable omissions. First, the Order fails to articulate the legal criteria for making the stop. In other words, it does not specifically address the

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[71] P. Premkumar, et al, Public Policy Institute of California, *Racial Disparities in Law Enforcement Stops* (2021).

[72] National Conference of State Legislators, 2023 Traffic Stop Data (last updated Jan. 12, 2021), https://www.ncsl.org/civil-and-criminal-justice/traffic-stop-data.

issues of reasonable suspicion and probable cause. Second, the Order does not address the issue of collecting data on traffic stops.

In interviews and focus groups, the 21CP team heard from Community members who felt that the police sometimes followed them when they were driving and then pulled them over without justification, at least from the Community member's perspective.

One Community member said they were driving home from school earlier this year when a police cruiser began following them closely. When they pulled over to let the cruiser pass, the officer initiated a traffic stop, claiming they were driving 40 mph in a 35-mph zone (a claim the driver denies). The officer was a member of the SRPD gang unit, and the driver felt they were profiled because they drive a large black Chevy Tahoe.
Another Community member told 21CP about an incident where they were pulled over for driving without a seatbelt. When the officer approached, the Community member showed the officer they were in fact wearing their seatbelt; they had elected to put the shoulder strap behind their body rather than across the body. According to the Community member, the officer was unprofessional and said to them, "I could search your car. I could do this the hard way. I could teach you a lesson." Shaken and upset, the Community member asked that a supervisor be called to the scene but the officer refused that request.

When surveyed, another Community member told 21CP that an officer sped up behind them, followed them home, and then turned on his lights once the Community member turned into their driveway. In the end, the member wasn't ticketed, but the officer never stated why he pulled the member over.

The mere perception of bias in traffic stops undermines public trust in the police.

An analysis of SRPD data shows that the Department averaged 3,184 traffic stops a year between 2018 and 2022 and issued an average of 5,552 citations a year during this period (Table 7). Between 2018 and 2022, traffic stops and citations declined by 54% and 72%, respectively. SRPD leaders suggested two primary reasons for the decline in traffic stops and citations: (1) a decline in the number of drivers on the road during the COVID-19 pandemic, and (2) a reduction in personnel due to a wave of officer resignations over the SRPMIC's COVID-19 vaccination requirement. (That mandate has subsequently been rescinded.)

Information on the demographic breakdown of persons stopped by the SRPD is not available. The 21CP team was informed that the Department collects some of this information, but it does not routinely analyze the data or produce reports for review. The lack of data, and the lack of analysis of data that is collected, are omissions that – as outlined below – need to be addressed going forward.

Table 7. Traffic Stop and Citation Activity

	2018	2019	2020	2021	2022	Annual Average 2018–22	% Change 2018–22
Citation*	5890	6759	8328	4068	2717	5552	-54
DUI	361	327	335	357	320	340	-11
Field Interview Card	955	941	741	666	688	798	-28
Traffic Stop	5527	4068	2659	2122	1543	3184	-72
Warning/Repair Ordered	5322	6362	3314	2554	2336	3978	-56
Total	18,055	18,457	15,377	9,767	7,304	13,792	-60

Data is from the SRPD Professional Standards Bureau

### 10.	2.	Officer-Initiated Activity

In addition to traffic stops, the 21CP team analyzed SRPD officers' other self-initiated activity between 2018 and 2022. This analysis included an examination of High Visibility Activities and security checks, both of which are a priority of SRPD leadership.

In the SRPD, most of patrol officers' workload stems from self-initiated activity rather than responding to calls for service from the public. Over the five-year period of 2018 through 2022, 71% of the Department's workload stemmed from officers' self-initiated activity (Table 8). This amount of self-initiated activity, which may be somewhat elevated in comparison to other law enforcement

agencies,[73] suggests that SRPD officers have an opportunity to devote increased time to community policing and problem-solving efforts, as outlined previously.

High Visibility Activities ("HVAs") and security checks were the most frequent category of police activity logged, on average, from 2018 through 2022. An HVA primarily involves having a police presence at a particular location as determined by the officer or from a list provided by a supervisor. It appears that the primary purpose of the HVA is for the officer to be seen, and not necessarily to engage in additional proactive problem-solving.

HVAs averaged 39% of the total self-initiated activity and 28% of the total calls for service during the five-year period reviewed.[74] In 2022, however, HVAs accounted for 72% of the self-initiated activity and 51% of the total calls for service.

What impact, if any, the HVAs are having is largely unknown, however. The SRPD does not routinely collect or evaluate information on the purpose or outcomes of HVAs. The Department occasionally receives feedback from members of the Community that they saw the police. And the 21CP team heard from Community members who appreciated seeing a police presence in areas known for speeding and other traffic violations. However, the team also heard about problem areas – such as the so-called "Pillville" area where drug activity is alleged to be rampant – in which Community members would appreciate a greater, dedicated police presence.

A "security check" involves an officer periodically stopping at a residence or business to ensure the location is safe. Most security checks are self-initiated by officers on businesses in their patrol area, but they can also stem from a request from someone in the Community. From 2018 through 2022, the SRPD conducted

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[73] There are several methods of determining the number of patrol officers needed by the department. The most precise method is through workload analysis in which the time it takes to handle calls for service, self-initiated activities, and administrative duties is determined and staffing requirements are calculated based on those numbers. In this method, it is important for the department to determine the proportion of time that they would like to have officers engage in proactive or self-initiated activity. It varies from department to department, but 33% to 40% is frequently used as the target. Although patrol staffing levels are not within the scope of 21CP's work, understanding the workload is important to making recommendations concerning policing strategies. For more information on police staffing see: Wilson, Jeremy M., and Alexander Weiss. 2014. *A Performance-Based Approach to Police Staffing and Allocation.* Washington, DC: Office of Community Oriented Policing Services; and McCabe, J.E., & O'Connell, P.E. (2017). *Factors related to police staffing.* International Journal of Humanities and Social Science Review, 3(6).

[74] "Total calls for service" represents the combined total of officer self-initiated activity and citizen generated calls to the police.

an average of 9,350 security checks a year. The average is heavily influenced by the year 2020 (the beginning of the COVID-19 pandemic), when the SRPD conducted 35,065 security checks. In the other years, the number ranged from 1,338 (2021) to 5,298 (2019).

Notably, since 2018 there has been a sharp decline in officer-initiated activities that are defined as "community policing." Some of this can be attributed to the impact of COVID-19 on public activities across the country, including police-community interactions. The SRPD did not return to its "new normal" operating posture post-COVID until April 2022, meaning there were two full years of reduced community interactions. Still, between 2020 to 2022, there was a dramatic, 85% decrease in these engagements among SRPD officers. It would be expected that since the SRPD had 3,115 community policing engagements in 2020 (despite the surge of COVID-19 in March of that year), the Department would have at least as many such interactions in 2022, during the eight-and-a-half months after the SRPD resumed its "new normal" operations. 21CP's analysis would suggest that the Department's priorities shifted in 2020 away from public-facing events and engagements to HVAs and security checks. As noted above, these activities are largely about observation and maintaining a police presence, not intentional engagements meant to build trust and rapport with the Community through partnerships and problem-solving.

Table 8. Officer-Initiated Activity

	2018	2019	2020	2021	2022	Annual Average 2018–22	% Change 2018–22
Citation	5890	6759	8328	4068	2717	5552	-54%
DUI	361	327	335	357	320	340	-11%
Field Interview Card	955	941	741	666	688	798	-28%
Traffic Stop	5527	4068	2659	2122	1543	3184	-72%
Warning/Repair Order	5322	6362	3314	2554	2336	3978	-56%
Security Check	2670	5298	35,065	1338	2378	9350	-11%
HVA	2999	3360	24,225	34,400	30492	19,095	+90%
Susp Activity*	491	402	338	308	270	362	-45%
Susp Person*	1217	1167	822	559	568	867	-53%
Susp Vehicle*	1994	2004	1550	1055	1143	1549	-22%
Community Policing	6346	8675	3115	483	459	3816	-93%
Total SIA	33,771	39,363	80,459	47,510	42,614	48,743	+21%
SIA % CFS	60	66	82	74	72	71	+12%
Total CFS*	56,587	59,312	98,122	64,627	59,492	67,628	+5%

Data provided by SRPD Professional Standards Bureau
* An unknown portion of these may be from calls for service

3. Arrests

In a welcome letter to officers on their first day on the job, the Chief asks them to remember they "took an oath to uphold the Constitution, Laws, Serve, Protect and

uphold the Public Trust."[75] Officers receive training on making traffic stops that address the requirement for reasonable suspicion, search and seizure laws, laws of arrest and Constitutional law.[76]

Arrests are often the result of self-initiated activity when officers observe unlawful behavior. They are also made by officers investigating crimes reported by the public. For the years 2020 through 2022, SRPD officers averaged 2,127 arrests per year. Native Americans accounted for 31% of the individuals arrested. Total arrests declined slightly over this three-year period; the number of Native Americans arrested was essentially unchanged.

Table 9. Arrest Activity

	2020	2021	2022	Total	Average (%)
Native	651	652	659	1962	654 (31%)
Non-Native	1619	1505	1296	4420	1472 (69%)
Total	2270	2157	1955	6382	2127

Data is from the SRPD Monthly Crime Reports prepared by the Professional Standards Bureau

11.   B.   Recommendations

Recommendation 12. The SRPD should revise Operations Order 6.01 to provide specific guidelines on the necessary legal requirements for initiating traffic stops. SRPD should expand training to officers on the revised policy and non-voluntary encounters.

Current Operations Order 6.01 is a nine-page directive that provides detailed guidance to officers on traffic stops. However, the Order does not include specific guidance on the basis for making a stop (i.e., reasonable suspicion, probable cause). Some policy information and definitions can be found in other Departmental orders (for example, Operations Order 4.2 and Operations Order 4.11), but this information should be included in Operations Order 6.01. And while SRPD officers receive training on this topic, the Department's policy directive should clearly and specifically articulate when officers may initiate a stop and

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[75] SRPD, Memorandum from the Chief of Police, Welcome to Our Family, Dec. 12, 2022.

[76] SRPD, Traffic Stops and Citations Lesson Plan, Mar. 3, 2021.

involuntarily detain an individual.

Many police agencies maintain specific, detailed guidance within their policies on when and how various types of stops, searches, and arrests may and may not be permissible.[77] The failure to include these key legal concepts and standards in the order on traffic steps may leave SRPD officers without sufficient direction necessary to carry out these crucial responsibilities lawfully and appropriately. It is a significant omission that the Department should correct right away. Laws and obligations surrounding stops, searches, seizures, and arrests are notoriously complicated.[78] The differences among various types of encounters with individuals, the boundaries and restrictions on various types of searches, and the requisite levels of legal justifications that officers must have before conducting various types of stops, searches, and arrests are complex and nuanced. The SRPD should provide its officers with more specific guidance on these issues.

As SRPD revises its policy guidance on traffic stops and other non-voluntary encounters, the Department should emphasize that officers must embody the principles of procedural justice in their conduct of such encounters. Generally, procedural justice means a commitment, across interactions, to (1) being fair in processes; (2) being transparent in actions (often by explaining the nature and rationale for officers taking particular actions during encounters); (3) providing an opportunity for subjects to give voice; and (4) being impartial in decision-making.[79] Acting with procedural justice reflects that:

> People want an opportunity not only to understand what is happening but also to feel they have an opportunity for voice [sic] to ensure their side of the story is heard. No one likes to feel their future is being decided upon at another person's whim; rather, people want voice or representation in decisions that may directly affect them. We all want decision making to be guided by impartiality, ensuring that biases did

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[77] *See, e.g.,* Baltimore Police Department, Policy 1112: Field Interviews, Investigative Stops, Weapons Pat-Downs & Searches (Oct. 12, 2020), https://www.baltimorepolice.org/1112-draft-field-interviews-investigative-stops-weapons-pat-downs-and-searches; New Orleans Police Department, Chapters 1.2.4, 1.2.4.3, available at https://www.nola.gov/nopd/policies/ (last visited Sept. 19, 2023).

[78] *See generally* Stephen Budiansky, "Rescuing Search and Seizure," *The Atlantic* (Oct. 2020), https://www.theatlantic.com/magazine/archive/2000/10/rescuing-search-and-seizure/378402/ (observing that Fourth Amendment-related legal "rules are hard for a layperson to make much sense of," with the application of various exceptions to the warrant requirement especially "bewildering").

[79] The Justice Collaboratory, Yale Law School, *Procedural Justice*, https://law.yale.edu/justice-collaboratory/procedural-justice (last visited Sept. 19, 2023).

not influence the decision and ultimately the outcome.[80]

Recommendation 13. SRPD should collect more detailed data on traffic stops and other non-voluntary encounters so that it can be accessed and analyzed internally and also made available to the Community.

The SRPD collects some data on traffic stops, but the Department does not routinely analyze the data or provide reports to members of the SRPMIC. Not collecting systematic, uniform information on non-voluntary encounters like traffic stops leaves SRPD less able to systematically analyze its performance with respect to a core enforcement activity. Specifically, by not collecting and reporting detailed information about all non-voluntary encounters the SRPD has with members of the public, SRPD supervisors, the Department, and Community stakeholders lack the information they need to assess performance, identify issues, and promote accountability.

Because "[s]top data collection is an essential practice for every law enforcement agency, no matter how small or specialized,"[81] SRPD policy should expressly require that, for all non-voluntary encounters – that is, all those that implicate significant legal considerations and guidelines because they are interactions in which a reasonable subject, under the circumstances, would not feel free to leave – officers provide information about:

- The location of the investigatory stop or encounter;
- The race, ethnicity, gender, and age of the subject;
- A specific, free-response description of the legal justification for the stop or encounter (such as the reasonable articulable suspicion necessary to justify a *Terry* stop[82]);
- The duration of the stop or encounter;
- Whether a frisk or other search was conducted, and what, if anything, was discovered pursuant to the search; and
- The outcome of the interaction (such as an arrest, citation, warning, or

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[80] U.S. Department of Justice, Office of Community Oriented Policing Services, (Apr. 2015), *Organizational Change through Decision Making and Policy: Procedural Justice Course for Managers and Supervisors*, https://cops.usdoj.gov/html/dispatch/04-2015/a_new_procedural_justice_course.asp.

[81] Marie Pryor, et al, Center for Policing Equity & Policing Project at NYU School of Law, *Collecting, Analyzing, and Responding to Stop Data: A Guidebook for Law Enforcement Agencies, Government, and Communities* 13 (2020), https://static1.squarespace.com/static/58a33e881b631bc60d4f8b31/t/5f7335d7294be10059d32d1c/1601385959666/COPS-Guidebook+Final+Release+Version.pdf.

[82] As established by the U.S. Supreme Court, the purpose of a *Terry* stop is to conduct a brief investigation to confirm or deny that a suspect is involved in criminal activity. *Terry v. Ohio,* 392 U.S. 1 (1968).

the interaction concluding without any specific action or activity).[83]

There is an ever-growing body of national guidance on the topic of systematically capturing information about non-voluntary police-civilian interactions.[84]

21CP emphasizes here that collecting information about individual stops does not involve the collection of "data" just for the sake of data collection. Instead, it involves logging critical information about important encounters that go to the heart of issues such as police legitimacy, equity, and overall community trust.

SRPD should make statistical information about stop activity available to the Community, either as a stand-alone report or as part of the SRPD's annual report (see Recommendation 2). Transparency with respect to this policing activity can enhance the Community's understanding of what the police do and their trust in the Department.

Recommendation 14. The SRPD should conduct regular audits of its non-voluntary encounters, including traffic stops, to ensure they are following Constitutional guidelines and that officers are treating individuals with respect and in a procedurally just manner.

In addition to collecting, analyzing, and publishing data on stops, the SRPD should conduct regular audits of its non-voluntary interactions with members of the public. This would include the review of dispatch records, computer entries, police reports and citations, and other documentation for a sample of traffic stops, pedestrian stops, and other non-voluntary encounters. It will also entail reviewing footage from officers' body-worn cameras (see Recommendation 23).

Such audits serve two primary purposes: (1) ensuring that officers have a lawful basis for the stops they make; and (2) assessing whether officers are treating all persons, including drivers they pull over and any passengers, in a

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[83] *See, e.g.,* Cleveland Division of Police, General Order, Investigatory Stops (Apr. 25, 2019), https://static1.squarespace.com/static/5651f9b5e4b08f0af890bd13/t/5d81088a7a15 2a6219030763/1568737418788/Ex+B+Investigatory+Stops.pdf (listing required types of information and data that officers must report).

[84] The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 104–05 (2019); Marie Pryor, et al, Center for Policing Equity & the Policing Project at NYU School of Law, *Collecting, Analyzing, and Responding to Stop Data: A Guidebook for Law Enforcement Agencies, Government, and Communities* (2020), https://policingequity.org/images/pdfs-doc/COPS-Guidebook_Final_Release_Version_2-compressed.pdf.

procedurally just manner and with appropriate courtesy and respect. The audits would initially be conducted by the SRPD Professional Standards Bureau and could then be reviewed by the Inspector General (see Recommendation 11). The results of the audits could be used for training purposes (providing examples of both exemplary and questionable actions on the part of officers) and to inform future policy adjustments.

Recommendation 15. SRPD should refocus its High Visibility Activities away from being a largely stand-alone initiative and instead direct officers' discretionary time to specific community policing and problem-solving objectives established by the police beat team and Community partners.

As noted previously, SRPD patrol officers have large amounts of discretionary time when they are not answering calls for service, and much of this time is currently spent on High Visibility Activities (HVAs).   In 2022, just over half of officers' total time was devoted to HVAs. The Department does receive positive feedback from members of the Community about officers engaged in HVAs. But beyond this anecdotal information, the SRPD does not routinely collect detailed data on the results or outcomes of HVAs. As a result, it is unclear what impact HVAs are having on public safety.

As the SRPD expands its community policing and problem-solving activities in the manner discussed previously, the use of officers' discretionary time will need to dramatically change. Rather than simply establishing a short-term presence at a particular location, as the HVAs do now, officers will be expected to use their discretionary time engaging directly with Community members and carrying out the problem-solving plans that have been created for their police beats. Officers' time and activities will need to be much more intentional and focused than they are under the HVA model.

Of course, some problem-solving strategies developed by a beat team and the Community may call for establishing a strong police presence at a problem location at targeted times. In that instance, an HVA would be an appropriate tactic as part of a larger, collaborative approach to addressing a priority crime problem.

IV.   USE OF FORCE

Between 2018 and 2022, SRPD averaged 64 use-of-force incidents a year, the majority of which involved lower-level uses of force, such as verbal commands, soft empty hands, and going hands-on. There were 87 Taser deployments during the five-year period – an average of about 17 per year, though the number of Taser deployments fell to just eight (8) in 2022. Excluding discharges at animals, SRPD personnel recorded four (4) firearms discharges during the five-year period; only one of those was an officer-involved shooting.

Table 10.   Use-of-Force Incidents

	2018	2019	2020	2021	2022	TOTAL	% of
40 mm. Less Lethal	0	4	2	5	1	12	3.70%
Chemical Agent	0	1	0	1	0	2	0.60%
Handgun	0	0	0	2	2	4	1.60%
Hands On	18	27	4	29	14	92	28.60%
Hard Empty Hand	5	9	2	4	0	20	6.20%
Impact Techniques	1	1	4	3	0	9	2.80%
K-9	1	0	1	0	1	3	0.90%
Pain Compliance	0	3	0	1	0	4	1.20%
Pressure Points	1	1	0	2	1	5	1.60%
Restraints	2	3	0	4	0	9	2.80%
Soft Empty Hand	1	16	4	12	1	34	10.60%
TASER	16	23	11	29	8	87	27.00%
Verbal Commands	7	10	6	14	3	40	12.40%
TOTAL	52	98	34	106	31	321	

Data is from the SRPD Professional Standards Bureau

Despite the relatively low number of instances where SRPD officers used force, 21CP team heard from several Community members during focus groups and interviews who either personally experienced or witnessed what they considered to be excessive use of force by members of the SRPD or had heard accounts from others about police use of excessive force. As the scope of the present evaluation did not involve the investigation of individual incidents, the 21CP team was unable to follow up on these individual reports.

As noted in the Accountability Section, Community members say that they do not always file formal complaints about use of force either because they do not know

how to file a complaint or they do not trust the process. Between 2019 and the first half of 2023, the Professional Standards Bureau logged only four citizen complaints alleging excessive force. In all but one of the cases, the officers were exonerated.

In the vast majority of cases in which officers used force, the subjects were fleeing or resisting apprehension (Table 11). About 18% involved self-defense or the defense of another.

Table 11.   Use of Force Situations

	2018	2019	2020	2021	2022	**TOTAL**	*% of*
Fleeing Apprehension	3	8	6	14	6	**37**	*25.30%*
Resisting Apprehension	11	21	14	27	10	**83**	***56.90%***
Self Defense	5	7	1	6	1	**20**	*13.70%*
Defense of Another	3	0	0	2	0	**5**	*3.40%*
No Entry	1	0	0	0	0	**1**	*0.70%*
TOTAL	**23**	**36**	**21**	**49**	**17**	**146**	

Data is from the SRPD Professional Standards Bureau

The perception among Community members that some SRPD members use force that is excessive – or at least unnecessary – hinders public trust in the police and may inhibit police-community cooperation. Community members surveyed by 21CP said:[85]

> *"They are eager to use force when [it] is not necessary."*

> *"They are rude and yell all the time. They never try to de-escalate situations, they make it worse. They create probable cause to start problems. They act like they are in the military and treat us as like 3rd-class citizens…. They use extreme physical force on all Community members, including [the] elderly and under-age children."*

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[85] 21CP Solutions. *Salt River Pima Maricopa: Public Safety Survey.* Collection of feedback from June 2023-August 2023.

"I've had many interactions with the SRPD. I am not a criminal but I've been treated like one. I've been thrown around, made to walk through thorns without shoes, and called for help twice, and no one came. I don't call them anymore."

It is important that the SRPD strengthen aspects of its use-of-force policies, training, and reporting to help strengthen Community confidence in the police.

Recommendation 16. SRPD should update the Use-of-Force Order to emphasize more strongly the sanctity of human life and the importance of de-escalation.

Overall, SRPD's Operations Order on Use of Force (1.05) addresses a number of key issues and reflects guidance that is consistent with best practices nationally. For instance, the Order prohibits the use of choke holds, severely restricts officers from firing their service weapons at a moving vehicle, requires officers to intervene when fellow officers are engaging in excessive force, and directs officers to render first aid to a subject who has had force used against them. It also delineates reporting requirements following a use-of-force incident, spells out how use-of-force incidents are to be investigated, and establishes training requirements. The Order further recognizes the trauma that officers involved in serious use-of-force incidents may experience, identifies resources available to officers, requires a psychological debriefing with a trained counselor, and provides options for officers returning to work. 21CP commends SRPD for maintaining a use-of-force policy that is consistent with and embodies many forward-thinking elements.

At the same time, some specific updates would make the current use of force policy stronger.

> **Recommendation 16(a). SRPD's existing statement recognizing the sanctity of human life should appear more prominently at the outset of the policy.**

The statement that SRPD "recognizes and respects the value of human life" currently appears at the bottom of the initial paragraph entitled "Use of Force Philosophy." Putting this statement front and center sends the message that protecting human life is the core value around which the entire use-of-force policy is built.

> **Recommendation 16(b). In addition to stating that any use of force must be "objectively reasonable," the Use-of-Force Order should emphasize that all uses of force should be both "<u>necessary</u>" and "<u>proportional</u>" to the threat being faced and that no other, less intrusive option is available.**

"Objective reasonableness" is the legal standard for police use of force established

by the U.S. Supreme Court.[86] The SRPD's current use-of-force policy addresses this bedrock principle. However, the SRPD's current policy does not sufficiently address the key concepts of necessity and proportionality.

The SRPD's use-of-force policy should authorize force only when it is necessary under the circumstances. In the current order, necessity is discussed in the context of "prevent[ing] imminent serious bodily injury or death or unless such force is reasonable based on the totality of circumstances." However, the concept of necessity is tied not to an officer's determination as to whether to use force but, instead, to the amount, type, or scope of force that an officer applies.

The SRPD policy should expressly state that any force, regardless of level or severity, may be deployed only when and if it is necessary under the circumstances. Other departments have incorporated the concept of necessity into their policies:

- **Denver Police Department** – "Force may only be used if non-force alternatives would be ineffective in effecting a detention for any lawful purpose, an arrest, preventing an escape or preventing an imminent threat of serious bodily injury or death to an officer or another person. The intended action must be required based on the circumstances and will only consist of the amount of force needed to safely accomplish a lawful purpose."[87]

- **Baltimore Police Department** – "Force is necessary only when no reasonably effective alternative exists. When force is necessary, members shall use force in a manner that avoids unnecessary injury or risk of injury to members and civilians."[88]

- **Cleveland Division of Police** – "Officers shall use force only as necessary, meaning only when no reasonably effective alternative to the use of force appears to exist, and then only to the degree which is reasonable to effect the intended lawful objective."[89]

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[86] *Graham v. Connor*, 490 U.S. 386 (1989).

[87] Denver Police Department, Operations Manual, Section 105.01(2), Use of Force Policy, https://www.denvergov.org/content/dam/denvergov/Portals/720/documents/OperationsManual/OMSBook/OM_Book.pdf (Sept. 1, 2020).

[88] Baltimore Police Department, Policy 1115 at 4 (Nov. 24, 2019), https://www.baltimorepolice.org/1115-use-force.

[89] Cleveland Division of Police, General Police Orders, Use of Force: General at 1, https://static1.squarespace.com/static/5651f9b5e4b08f0af890bd13/t/582c54ac59cc685797341239/1479300270095/Dkt.+83--Use+of+Force+Policies+with+Exhibits.pdf.

The SRPD policy should also emphasize the related idea of "proportionality." In the context of use of force, proportionality is not a type of mathematical formula which implies that officers may only use force that is somehow "equal" or "equivalent" to the level of force of resistance used by the subject. Rather, "proportionality requires that any use of force corresponds to the risk of harm the officer encounters, as well as to the seriousness of the legitimate law-enforcement objective that is being served by its use."[90] The requirement that force be proportional "means that even when force is necessary to achieve a legitimate law-enforcement end, its use may be impermissible if the harm it would cause is disproportionate to the end."[91]

Over half of the country's 50 largest police departments have a proportionality requirement in their use-of-force policies.[92] For example:

- **Baltimore Police Department** – "Members shall use only the force Reasonable, Necessary, and Proportional to respond to the threat or resistance and to effectively and safely resolve an incident.… Proportionality measures whether the force used by the member is rationally related to the level of resistance or aggression confronting the member."[93]

- **Los Angeles Police Department** – "Officers may only use a level of force that they reasonably believe is proportional to the seriousness of the suspected offense or the reasonably perceived level of actual or threatened resistance."[94]

- **Newark Police Division** – "Police Division members shall consider a subject's level of resistance when using force.… The level of control used shall be proportional to the threat or resistance the member encounters."[95]

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[90] American Law Institute, *Principles of the Law: Policing* §7.05 cmt. a, https://www.policingprinciples. org/chapter-7/7-05-proportional-use-of-force/.

[91] *Id.*

[92] Brandon L. Garrett & Seth W. Stoughton, "A Tactical Fourth Amendment," 103 *Virginia Law Review* 211 (2017).

[93] Baltimore Police Department, Policy 1115 at 1, 4 (Nov. 24, 2019), https://www.baltimorepolice. org/1115-use-force.

[94] Los Angeles Police Department, "Policy on the Use of Force – Revised," (June 29, 2020), https://www. lapdonline.org/home/news_view/66709.

[95] Newark Police Division, General Order No. 18-20, Section VII-A-1, https://www.newarkpdmonitor. com/wp-content/uploads/2019/04/Use-of-Force-Policy.pdf (Nov. 8, 2018).

The concepts of necessity and proportionality also imply that officers can use a particular level of force only when other, less intrusive force options are not available or are unlikely to succeed. In other words, officers should apply the minimum level of force needed to address the threat of harm or resistance. For example, in its revised use-of-force policy for federal officers, the U.S. Department of Justice has adopted the following language:

Officers may use force only when no reasonably effective, safe, and feasible alternative appears to exist and may use only the level of force that a reasonable officer on the scene would use under the same or similar circumstances.[96]

The SRPD should update its use of force policy to clearly articulate and explain the concepts and requirements of necessity and proportionality.

> **Recommendation 16(c). SRPD's use of force policy should more clearly define what de-escalation is and emphasize that, whenever feasible, de escalation is the preferred approach to situations in which the use of force may be considered.**

Operations Order 1.05 defines de-escalation as "an employee's intent to resolve an incident as safely as possible to protect the public and persons involved by reducing the danger through the use of tactics, techniques, and force options." The policy further states that, "When use of force is needed, employees will assess each incident to determine based on policy, training, and experience, which use of force options will de-escalate the situation and bring it under control." As written, the policy suggests that de-escalation is something that is implicated only *after* an officer has decided that use of force may be necessary. However, "de-escalation" is more properly viewed as a set of tactics and strategies that can be deployed *before* use of force is considered. De-escalation is aimed at successfully resolving a situation, minimizing or eliminating a threat, and advancing public safety without using force at all, or with less significant force.[97]

SRPD should revise its policy to emphasize that all officers have an affirmative duty to use de-escalation tactics, techniques, and strategies whenever possible under the circumstances. For instance:

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[96] United States Department of Justice, Justice Manual, Policy on Use of Force (July 2022), https://www.justice.gov/jm/1-16000-department-justice-policy-use-force.

[97] International Association of Chiefs of Police, "De-escalation: Guidelines for How to Begin Evaluating Your Agency's De-escalation Practices, https://www.theiacp.org/sites/default/files/Research%20Center/Combined%20v2.pdf (last accessed Sept. 19, 2023).

- **IACP National Consensus Policy on Use of Force** – "An officer shall use de-escalation techniques and other alternatives to higher levels of force consistent with his or her training wherever possible and appropriate before resorting to force and to reduce the need for force."[98]

- **American Law Institute Principles on Use of Force** – "Agencies should require, through written policy, that officers actively seek to avoid using force whenever possible and appropriate by employing techniques such as de-escalation."[99]

- **Seattle Police Department** – "When safe, feasible, and without compromising law enforcement priorities, officers shall use de-escalation tactics in order to reduce the need for force."[100]

- **New Orleans Police Department** – "When feasible based on the circumstances, officers will use de-escalation techniques, disengagement; area containment; surveillance; waiting out a subject; summoning reinforcements; and/or calling in specialized units such as mental health and crisis resources, in order to reduce the need for force, and increase officer and civilian safety. Moreover, the officers shall de-escalate the amount of force used as the resistance decreases."[101]

Further, in addition to describing the various tools and techniques for gaining compliance from a subject, the Order should stress that using strategic communication skills with a subject is a foundational de-escalation tool that officers should deploy before, and even as, they turn to other means, such as a less-lethal device.

Recommendation 17. The SRPD should update the Operations Order on Tasers to more tightly control when the device can be used in "drive stun" mode.

The SRPD Operations Order on Taser and Pepperball Launcher (1.06) provides

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[98] International Association of Chiefs of Police, *National Consensus Policy and Discussion Paper on Use of Force* 3.

[99] American Law Institute, *Principles of the Law: Policing* §7.04, https://www.policingprinciples.org/chapter-7/7-04-de-escalation-and-force-avoidance/.

[100] Seattle Police Department Manual, Section 8.100: De-Escalation (rev. Sep. 15, 2019), https://www.seattle.gov/police-manual/title-8---use-of-force/8100---de-escalation.

[101] New Orleans Police Department, Operations Manual, Chapter 1.3, Use of Force Policy at 5, *available at* https://www.nola.gov/getattachment/NOPD/NOPD-Consent-Decree/Chapter-1-3-Use-of-Force.pdf/.

detailed guidance on when and how officers should use these less-lethal tools. However, the Order is lacking when it comes to guidance on Taser use in the "drive stun" mode. In "drive stun" mode, the Taser is applied directly to the subject's body, which delivers a painful electrical shock but does not cause neuro-muscular incapacitation, as the "probe" mode is designed to do in order to allow officers an opportunity to bring the incapacitated subject into compliance.

The current SRPD Order merely provides that "the 'drive stun' technique may be used on large muscle groups or nerve points of the legs, arms, stomach or back." It does not provide guidance or limitations on when the drive stun mode should be used, nor does it describe the possible unintended consequences of using the Taser in drive stun mode.

In its 2011 "Electronic Control Weapons Guidelines," the U.S. Department of Justice, Office of Community Oriented Policing Services observes:

> Using the ECW to achieve pain compliance may have limited effectiveness and, when used repeatedly, may even exacerbate the situation by inducing rage in the subject. For these reasons, agencies should carefully consider policy and training regarding when and how personnel use the drive stun mode, and should discourage its use as a pain compliance tactic. Drive stun has an applicable but limited purpose that should be taught, explained, and monitored during ECW training and field use.[102]

The SRPD should update its Taser and Pepperball Launcher Order to reflect these national guidelines and then train personnel on the updated policy. In general, the policy should direct officers to refrain from using Tasers in drive stun mode for pain compliance only. Drive stun should be used only in extraordinary circumstances when an officer is trying to gain control of a combative subject and other, less intrusive options have not worked or are unlikely to work. The Department should also review Taser deployments over the past several years, ascertain how many involved drive stun mode, and use that data to further inform future policy and training.

Recommendation 18. The SRPD should incorporate more scenario-based exercises into its use-of-force/de-escalation training – including training on revisions to the Department's use-of-force policy made pursuant to other recommendations.

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[102] Police Executive Research Forum, U.S. Department of Justice, Office of Community Oriented Policing Services, *Electronic Control Weapons Guidelines*. Pg. 14. (2011).

The SRPD provides its sworn members with regular training on use of force and de-escalation, as required in Operations Order 1.05. Recruits in the Academy receive general use-of-force/de-escalation training as part of their state-certified training, which is usually conducted at the Mesa Police Department or Maricopa County Sheriff's Office. Recruits go through an Arizona POST-certified course that teaches "Seven Foundational Principles" of de-escalation. Academy graduates then receive a four-hour block of more specialized de-escalation training during their two-week Advanced Officer Training at the SRPD.

In 2022, all SRPD sworn officers went through de-escalation training using the same Arizona POST-certified course ("Seven Foundational Principles") that new recruits receive. This helped to ensure that all SRPD officers were trained on the same basic de-escalation principles. In addition, as part of their annual firearms recertification training, SRPD officers are tested on both accuracy and judgment. The latter involves using a simulator with three possible scenarios, which include "talking the subject down" and using either less-lethal or lethal force.

However, these training are missing one critical element: live-action, scenario-based instruction grounded in adult learning techniques. Covering the basics of de-escalation in classroom instruction and using video case studies is valuable, as is the use of simulators. However, officers should have meaningful opportunities to practice what they learn in the classroom in a dynamic and realistic setting. In its final report, the President's Task Force on 21st Century Policing emphasized the importance of "realistic, scenario-based training to better manage interactions and minimize using force."[103] The Leadership Conference for Civil Rights similarly observes that scenario-based instruction can address potential issues of bias in police decision making: "[O]fficers should practice, in interactive environments . . . de-escalation techniques and threat assessment strategies that account for implicit bias in decision-making."[104]

In recent years, and consistent with policing's ever-growing utilization of adult learning techniques in officer training, many agencies have added role-playing and/or scenario-based exercises to their use-of-force/de-escalation training. These exercises use live actors (often other police officers or individuals trained in theater) to serve as role players, often portraying an individual in a mental or behavioral health crisis. Use of role players provides for more realistic and dynamic encounters for testing officers' skills than can be achieved with a

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[103] *Final Report of the President's Task Force on 21st Century Policing* (2015), https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf.

[104] The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 143 (2019).

simulator. Role players are trained to respond to how the officers are handling the encounter, whether that involves de-escalating or escalating the situation based on the officers' words and actions. Another advantage of live-action scenarios is that instructors and role players can debrief with the officers after the scenario is over, helping them learn what worked well and opportunities for improvement in real time.

There are existing de-escalation curricula that include scenario-based exercises that the SRPD could consider.[105] The Department may also want to work on developing its own scenarios based on the unique characteristics of the SRPMIC.

Finally, to complement its scenario-based training, the SRPD should explore opportunities using virtual reality (VR) technology. Virtual reality can provide immersive and realistic use-of-force and de-escalation training experiences in a safe and controlled environment that minimizes the risk of harm to officers or others.[106] Several vendors now offer VR training platforms. The SRPD might consider partnering with a VR training vendor to develop customized scenarios for Native communities that could then be shared with other tribal agencies.

SRPD should ensure that current officers receive in-depth training on changes and revisions made to the Department's force policy pursuant to the recommendations that this report outlines above.

Recommendation 19. The SRPD should publish statistical information on police officers' use of force and make it available to the Community.

As the issue of police use of force has been a focus of public attention in recent years, many agencies have begun to publish annual reports (or, in some cases, semi-annual or quarterly summaries) on their officers' use of force. In addition to demonstrating openness and transparency with the community, these use-of-force reports provide valuable information and context for the community on just how often officers use force and under what circumstances.

SRPD's Professional Standards Bureau already collects a variety of data on

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[105] One evidence-informed de-escalation curriculum that relies heavily on scenario-based instruction is ICAT (Integrating Communications, Assessment, and Tactics), from the Police Executive Research Forum. A 2020 study of the Louisville Metro (KY) Police Department found that ICAT training was associated with substantial reductions in use-of-force incidents and injuries to both citizens and officers.

[106] Carey Rhodes, "Why VR is an Effective Tool for Use of Force Training," *Police Technology News* (Jan. 24, 2023), https://www.policetechnews.com/post/why-vr-is-an-effective-tool-for-use-of-force-training.

officers' use of force. Much of this statistical information could be shared with the Community, either as a stand-alone report or as part of the SRPD's annual report to the Community (see Recommendation 2). An overall report on use force need not include specific personnel information that is protected from public disclosure. Rather, the report can provide statistical summaries and trend information that will help the Community better understand how often officers use force, what type of force they use, and under what circumstances. Such transparency can help address some of the Community's concerns about use of force in the SRPD by presenting accurate, aggregate information about the incidence of force each year.

The SRPD might look to other agencies to see the level of detail in their use-of-force reports:

- The **Los Angeles Police Department** publishes extremely detailed and lengthy reports, broken down by geographic area, units, time of day/day of week, etc.[107]

- The **Montgomery County, Maryland Police Department** publishes a concise, but still detailed analysis of its officers' use of force.[108]

- The **Chandler, Arizona Police Department** publishes quarterly statistical reviews on use of force, along with short summaries of each of the cases included in that quarter's report.[109]

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[107] Los Angeles Police Department, *Use of Force Year-End Review 2022*, https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2022-Year-End-Review.pdf.

[108] Montgomery County Department of Police, *Annual Use-of-Force Report 2022*, https://www.montgomerycountymd.gov/pol/Resources/Files/Annual-Reports/UseOfForce/2022%20MCPD%20Use%20of%20Force%20Report%20FINAL_ED3_saf_dh_df_mj_03222023.pdf.

[109] Chandler Police Department, Open Data, Use of Force Reviews, https://data.chandlerpd.com/use-of-force-reviews/ (last visited Sept. 19, 2023).

V. BODY-WORN CAMERAS

As part of this project, 21CP was asked to review two individual cases in which members of the Council and Community expressed concern about the actions of SRPD officers. The examination included a review of the body-worn camera ("BWC") footage of the officers involved.

This review found instances where SRPD officers were turning off or intentionally covering up their body-worn cameras during times when they should have been recording. A review of the SRPD's policy on body-worn cameras found that, though the policy identifies when BWCs should and should not be activated, there is no specific prohibition in the policy against selectively turning off or covering up the cameras.

This type of activity goes against national best practices. In a 2014 report, the U.S. Department of Justice, Office of Community Oriented Policing Services recommended the following:

> Once activated, the body-worn camera should remain in recording mode until the incident/encounter has concluded, the officer has left the scene,

or a supervisor has authorized (on camera) that a recording may cease.[110]

In addition, the 21CP team heard from Council members about instances in which the SRPD apparently established such extensive crime scenes as to prevent Community members from seeing or filming what the officers were doing. Council members also relayed Community complaints about the SRPD disabling cameras on private property at locations where they were conducting enforcement operations. It is understandable that in certain situations, the Police Department would not want its activities captured in real-time on private video cameras. That is why it is so important, for the sake of transparency and accountability, that officers' body-worn cameras be turned and operational during the vast majority of enforcement actions. If there are questions or concerns that arise after the fact, the BWCs can provide an accurate accounting of what transpired.

The 21CP review uncovered another shortcoming in the SRPD's policies and procedures on body-worn cameras: BWCs are typically not used in certain tactical operations, such as entries to execute search and arrest warrants. These are often among the most dynamic situations that officers face, and the absence of BWC footage can deprive officers, supervisors, and managers from being able to effectively debrief after an operation. The lack of BWCs can also undermine accountability and erode public trust in how the Police Department operates, especially if there are questions about a particular event.

One impediment is that the cameras the SRPD currently uses do not readily support these types of tactical operations. The BWCs cannot easily fasten to officers' tactical gear or be mounted on protective helmets. In addition, SRPD policy expressly exempts certain officers (including Special Operations Unit personnel) who are engaged in "tactical operations" from using BWCs.

The SRPD should update its policies and procedures on the use of body-worn cameras to ensure officers are properly recording their activities and capturing certain tactical operations, including the execution of search and arrest warrants.

Recommendation 20. SRPD should revise its body-worn camera policy to expressly prohibit officers from turning off or covering up their cameras when they should be recording, unless there are extreme exigent circumstances.

Current SRPD policy identifies the situations in which BWCs should and should

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[110] Lindsay Miller & Jessica Toliver, Police Executive Research Forum, U.S. Department of Justice, Office of Community Oriented Policing Services, *Implementing a Body-Worn Camera Program: Recommendations and Lessons Learned* (2017).

not be activated. However, the policy is silent about officers selectively turning off or covering up the cameras during times when they would normally be recording. This behavior should be explicitly prohibited in Operations Order 4.53, except in extremely unusual circumstances, such as when the camera may capture an undercover officer or confidential informant or reveal sensitive information about an investigation.

Recommendation 21. The SRPD should revise its policy on body-worn cameras to require Special Operations Unit personnel to wear and activate body-worn cameras in most situations.

Section 4.B.7 of Operations Order 4.53 currently exempts Special Operations Unit (SOU) personnel from wearing BWCs during tactical operations. These personnel are typically involved in some of the most dynamic operations the SRPD engages in, including the serving of arrest and search warrants.

To support effective supervision, through debriefing of critical incidents, and transparency, the SRPD should remove the blanket exemption of SOU personnel from having to wear BWCs. When these personnel are easily identifiable as SRPD officers, they should wear BWCs during tactical operations.

Recommendation 22. The SRPD should explore technical options to enable the expanded use of BWCs during tactical operations.

As noted above, the SRPD's body-worn cameras cannot easily fasten to officers' tactical gear, including their helmets. This makes it extremely difficult for officers involved in executing search and arrest warrants and other tactical operations to capture these situations on camera. 21CP recommends that SRPD work with its current BWC provider to explore possible solutions, or the Department should investigate other BWC technology options.

Recommendation 23: The SRPD should establish a regular and rigorous schedule for auditing body-worn camera footage.

Section 9.A of Operations Order 4.56 states that the "SRPD audits and inspections supervisor will randomly inspect BWC system videos periodically." Given the critical role that BWCs play in ensuring accountability and identifying potential areas for improvement, this guidance is not specific enough.

Most departments review BWC footage after a critical incident or when the agency has received a complaint. Recently, however, more departments are establishing proactive BWC audit programs. By regularly pulling and reviewing random footage from officers' BWCs, these agencies are better able to monitor performance, identify training needs, and ensure officers are following Constitutional standards

and applicable laws and policies (see, also, Recommendation 14).

Some departments are now using artificial intelligence ("AI") to support their body-worn camera analysis and audit programs.[111] AI software allows agency personnel to quickly and easily comb through thousands of hours of BWC footage and identify encounters that may be both problematic or exemplary. This can help support policy, training, and supervision efforts.

The SRPD should assign personnel to oversee the BWC audit program and establish policies and procedures on when and how BWC footage will be reviewed. These reviews can then be passed along to the Inspector General for review and inspection (see Recommendation 11). BWC audits could be used to inform needed changes to policy, procedures, and/or training.

Recommendation 24. SRPD should communicate updates to its body-worn camera policies and procedures to all SRPD personnel.

Once updates to BWC policies and procedures have been implemented, the SRPD training unit should develop appropriate materials to communicate these changes Department-wide. A detailed Training Brief should be created and discussed at roll call briefings, and updates should continue to be disseminated through the Power DMS system and SRPD Operations Updates.

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[111] Bryan Corliss, "Seattle Police Department using AI software to analyze body cam footage and officer behavior," *GeekWire* (Feb. 3, 2023), https://www.geekwire.com/2023/seattle-police-department-using-ai-software-to-analyze-body-cam-footage-and-officer-behavior/.

VI. FACILITIES

One important but often overlooked aspect of effective modern policing is a department's facilities — the offices, station houses, and other buildings that police personnel work in. Modern, well-designed, and -equipped facilities can promote internal collaboration and efficiency. They facilitate communication and teamwork within organizational units and across teams. Well-designed facilities bring personnel together, strategically organize their workspaces, provide the technology and other resources to support effective collaboration, and offer physical space for police to interact and engage with community members.[112]

This is especially important for personnel in many of the support functions within a police department — investigations, crime analysis, administration, and agency leadership who, unlike patrol officers, spend much of their time in an office.

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[112] Otto E. Stalleworth, Jr. & Brian H. Kleiner, "Recent Developments in Office Design," 14 *Facilities* 34 (1996).

When these functions are physically siloed in different locations, it becomes more challenging both to conduct official meetings and to have the spontaneous "water cooler" conversations that often spur ideas and innovation.[113]

Facilities are important for patrol personnel as well. Even though they spend the majority of their time on the street, patrol officers and supervisors still need locker rooms to store their gear, spaces (and technology) to write reports and make phone calls, and rooms to conduct roll call briefings and other internal meetings.

Police facilities also play a role in the police-community relationship.[114] When police facilities are open, inviting, and accessible to the public, they can support cooperation and collaboration. They can serve as locations for meetings, problem-solving sessions, crime prevention forums, community training, and other activities. Having open and accessible facilities is also important for supporting the community-facing functions of a police department, such as filing reports or complaints.

In the 21CP team's interviews and other interactions with SRPD personnel, we always asked what the Department does well and what improvements are needed. On the latter, employees invariably mentioned the need for better facilities. This was consistent across organizational units, among personnel at all ranks and experience levels, and among both sworn and professional staff.

Some employees said they felt isolated and cut off from their co-workers because their office was a long distance from personnel in other units they needed to collaborate with. For some, attending meetings at the Police Administration building means spending considerable time in transit — time that could be used more productively, especially if there are multiple meetings in the same day. Other personnel said that because their facility is so isolated, they sometimes feel neglected or left out by the organization — an "out of sight, out of mind" feeling.

Other employees mentioned the lack of secure parking at their facilities for both Department and personnel vehicles. One sergeant relayed that a police vehicle at one location was severely damaged by vandals when personnel had to rush out to answer a call for service.

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[113] Claire Cain Miller, "When Chance Encounters at the Water Cooler Are Most Useful," *N.Y. Time*s (Sept. 3, 2021), https://www.nytimes.com/2021/09/03/upshot/when-chance-encounters-at-the-water-cooler-are-most-useful.html.

[114] Ian Reeves, "Facility Design for Community Engagement," *Police Chief*. https://www.policechiefmagazine.org/facility-design-for-community-engagement/?ref=4b51d08b798a31e219d2266c80520f23 (last accessed Sept. 19, 2023).

The 21CP team visited many SRPD facilities during our various site visits. While some, such as the Property and Evidence facility, are relatively new and well-appointed, many of the Department's facilities are outdated and not conducive to organizational efficiency or productivity. Some SRPD units occupy space that was originally designed for a completely different purpose. For example, the current gun and ammunition storage facility is an old refrigeration unit attached to a "training room" that was a jail cell in the facility. Similarly, the current workout facilities for officers are located inside a semi-renovated jail cell. Both spaces lack sufficient airflow and ventilation, making them especially uncomfortable in the hot Arizona summer.

The Emergency Communications Center, which operates the SRPMIC's 9-1-1 and non-emergency call-taking and dispatch functions, is in an older building that is physically isolated from other Department facilities. While the center has up-to-date technology, it lacks efficient workspaces and some of the design features that can support the physical and mental health and well-being of dispatch personnel.[115]

The SRPD's training facilities are also lacking. Even as the Training Unit has expanded its offerings in recent years (see Training Section), it lacks consistent, modern classrooms and suitable locations to conduct hands-on and scenario-based training. In many instances, staff has to call upon neighboring agencies to host classes and supply equipment. Having a modern, spacious, well-equipped training facility is important not only to internal readiness and morale – it can also impact recruitment by showing potential applicants that the department is committed to their personal growth, development, and safety.[116]

The Police Administration building appeared to the 21CP project team as neither inviting to the public nor sufficient for a modern, full-service police agency like the SRPD. Offices are small and cramped, and meeting space is limited and poorly organized. Several meetings the 21CP team had with SRPD employees were held in a second-floor conference room that is adjacent to the office of an SRPD Commander. During meetings, the Commander has to keep his door closed and walk through the meeting room to get to and from his office, or he has to stay out of his office altogether.

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[115] Phil Kalman, Samuels Group, Blog, "6 Crucial 9-1-1 Center Construction Considerations," (Aug. 16, 2022), https://www.samuelsgroup.net/blog/911-dispatch-center-construction-considerations.

[116] Police Executive Research Forum, *Transforming Police Recruit Training: 40 Guiding Principles* (Nov. 2022), https://www.policeforum.org/assets/TransformingRecruitTraining.pdf.

As the SRPD embraces a robust, Department-wide philosophy of community policing, it is important that the agency has the facilities that can support the work of its employees and enable strong partnerships with the Community.

Recommendation 25. The SRPMIC should conduct a comprehensive assessment of the facilities needs of the SRPD and develop both short- and long-term plans for upgrading key facilities. Construction of a new, technologically advanced public safety building that brings together key SRPD management, operational, training, and community policing and engagement functions in one facility should be a priority.

As discussed above, improving facilities is a clear priority for SRPD employees at all levels and in a variety of assignments. Upgrading the Department's facilities could boost both productivity and morale. A new, consolidated headquarters building would support internal communications, collaboration, and more effective supervision. It could also support the SRPD's community policing efforts by providing space for police and Community members to come together to collaborate in the problem-solving process.

As SRPMIC and SRPD contemplate new facilities, 21CP notes that national organizations like the International Association of Chiefs offer planning guidelines for agencies considering the construction of new police facilities.[117]

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[117] International Association of Chiefs of Police, *Police Facilities Planning Guidelines,* https://www.theiacp.org/sites/default/files/2019-10/Police_Facilities_Planning_Guidelines.pdf (last accessed Sept. 19, 2023).

VII.   STAFFING AND RECRUITMENT

Like police agencies across the country, the SRPD is facing serious staffing challenges for both sworn police officers and non-sworn personnel in its Public Safety Communications Bureau. As of the end of third quarter of 2023, the Department was short 31 sworn personnel out of an authorized head count of 158. While the Chief notes that the SRPD generally loses few officers to normal attrition, the large number of vacancies is largely the result of an SRPMIC policy early in the COVID-19 pandemic that all employees be vaccinated against the coronavirus. This requirement prompted more than 30 officers to leave the Department, and, in a challenging time overall for police recruiting, the SRPD has not been able to hire enough officers to fill that gap. (As noted previously, this vaccine mandate has subsequently been lifted.) In response, the SRPD has launched a number of officer recruitment efforts, including billboards, a booth at spring training baseball games, job fairs (including those targeting veterans), in-person visits at schools and military bases, and a recruiting showcase and walk-in hiring event. However, in a challenging environment overall for police recruiting, the SRPD has been unable to hire enough officers to fill the current gap.

With current staffing, the SRPD is often able to assign only one officer per shift

on each of its police beats. During most times, this staffing seems to be sufficient for officers to keep up with the calls for service on their beats. However, as the Department looks to reimagine and expand community policing (see Community Policing Section), it will be essential for the Department to have sufficient personnel to engage in meaningful collaboration with the community and engage in proactive problem solving, while also continuing to respond to calls for service.[118]

The number of officer vacancies can impact not only overall Department performance but also individual opportunities for advancement. The 21CP team heard from one patrol officer who had applied for and been accepted into a specialized unit but could not move into the new assignment until a replacement officer was hired to fill his spot in patrol.

The shortage of personnel in the Public Safety Communications Bureau is even more significant. As of the third quarter of 2023, the Bureau was short 15 dispatchers and one dispatch manager, representing well more than half of the authorized staffing for the emergency communication center. To help ease the staffing crunch, the Bureau routinely brings in 2-3 sworn SRPD members who previously served as dispatchers to work overtime assignments – a short-term and expensive band-aid.

According to Public Safety Communications Bureau leaders, the optimum staffing in the 9-1-1 center is four personnel on duty at all times. Currently, the center has only 2 to 3 staff (including a supervisor) on most shifts. Staff generally work 12-hour shifts, four days a week, and the supervisors typically have to spend their time on the floor answering and dispatching calls, leaving them little time for their supervisory duties. With current staffing levels, everyone in the unit has to perform all tasks – answering phones, dispatching both police and fire units, handling non-emergency requests, running license plates and name checks, etc. With more staff, the Communications Bureau managers would like to segregate some of these responsibilities – for example, separate call-taking and dispatching functions, a practice that many emergency communications centers follow. The Chief and Bureau leadership are also worried about employee burnout; the SRPD has lost dispatchers over the past year to other departments, in part because of the pressures caused by the lack of staff.

Money does not appear to be a major impediment to hiring either sworn officers or dispatchers. The starting salary for SRPD officers is among the highest in the state

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[118] Jeremy M. Wilson & Alexander Weiss, U.S. Department of Justice, Office of Community Oriented Policing Services, *A Performance-Based Approach to Police Staffing and Allocation* (2014).

of Arizona, and the SRPD is currently offering bonuses of $10,000 for new officers. In addition, managers report that the starting salaries for SRPD dispatchers is at or near the top of the pay range for dispatchers in the Phoenix area. Rather, the SRPD needs to get more creative and aggressive in attracting new personnel.

A key element of the recruiting strategy needs to include the hiring of more Community members for all positions in the SRPD: sworn officers, dispatchers, and other non-sworn professional staff. In interviews and focus groups, the 21CP team heard from several long-time Community members who said they remembered when the SRPD was a much smaller department and more of the officers were Community members. These individuals said that as the SRPD has grown and diversified, they do not feel as connected to the Police Department as they once did. While it is unlikely that the SRPD will ever return to the days when most of its officers were Community members, the Department should take steps to increase Community representation in its ranks.

Recommendation 26. The SRPD should update its recruitment materials to provide a more realistic, Community-centered view of policing that may appeal to a broader range of job candidates, in particular Millennials and members of Generation Z.

Like many other agencies, the SRPD's current recruiting materials focus on two things: starting salary and the "excitement" of police work. For example, the Department's recruitment video highlights activities such as dynamic building entries, motorcycle and K-9 patrols, and drone technology. But the video fails to show what is really the bread-and-butter of most police work: working in the Community to solve problems, help individuals in need, and improve public safety.

Research shows that many officers, especially minority and women officers, say they joined policing for reasons such as fulfilling a childhood dream and making a difference in the community[119] – motivations that should be highlighted in the SRPD's recruiting materials. In addition, when it comes to choosing a career, Millennials and Gen Z members tend to prioritize issues such as work-life balance, flexibility, and use of technology to gain new skills,[120] as well as organizations that value diversity and inclusion.[121] To the extent possible, the SRPD should address these issues in its recruiting materials and discussions with job candidates.

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[119] Jennifer C. Gibbs, "Diversifying the Police Applicant Pool: Motivations of Women and Minority Candidates Seeking Police Employment." 32 *Criminal Justice Studies* 207 (2019).

[120] Parmelee, M. Making waves: *How Gen Zs and Millennials are prioritizing-and driving-change in the workplace.* Deloitte Insights. https://www2.deloitte.com/us/en/insights/topics/talent/recruiting-gen-z-and-millennials.html. May 17, 2023.

[121] Ibid.

As the SRPD embraces a Department-wide philosophy of community policing (see Community Policing Section), it will be critical that the Department recruit and hire personnel who possess both the skills and the mindset to practice community policing and engage in problem solving. SRPD recruitment materials should highlight the uniqueness of the Community and the opportunity to work closely with members of the SRPMIC to build a safer Community.

Recommendation 27. The SRPD should seek approval from the SRPMIC Council to expand recruitment incentives for police officers beyond the cash bonus, to include other forms of employee assistance and a greater focus on employee wellness.

The SRPD already offers one of the highest starting salaries among police agencies in the state of Arizona – and at the same time offers a $10,000 cash bonus for new hires or lateral officers hired from other agencies. However, these monetary incentives alone do not appear to be boosting hiring in the short term to fill the current shortage of officers. Therefore, the SRPMIC should explore other types of incentives to increase recruitment. These could include assistance with child-care costs, housing, student loan repayment, and tuition reimbursement for personnel who are attending school.

The Department should also review its policies that impact work-life balance and wellness. While the structure of police agencies often limits what departments can do with issues such as scheduling, more agencies today are focusing on promoting physical and mental health among members and their families through robust employee wellness programs.[122]

Recommendation 28. To address the immediate shortage of dispatch personnel, the SRPD should seek approval from the SRPMIC Council to establish a cash bonus and offer other short-term recruitment incentives. For the longer term, the Department should work to establish a more reliable pipeline of job candidates.

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[122] U.S. Department of Justice, Office of the Associate Attorney General, Officer Safety and Wellness Resources, https://www.justice.gov/asg/officer-safety-and-wellness-resources#financial (last visited Sept. 19, 2023). *See also* Police Executive Research Forum, U.S. Department of Justice, Office of Community Oriented Policing Services, *Building and Sustaining an Officer Wellness Program: Lessons from the San Diego Police Department* (2018), https://www.policeforum.org/assets/SanDiegoOSW.pdf; Rodney W. Rego, "Building a Successful Officer Wellness Program," FBI Law Enforcement Bulletin, (Mar. 11, 2020), https://leb.fbi.gov/articles/featured-articles/building-a-successful-officer-wellness-program.

The SRPMIC has not authorized a cash hiring bonus for people hired as dispatchers, as has been done for police officers. To help address the immediate staffing crisis in the emergency communications center, the Council should authorize a cash bonus for newly hired dispatchers and explore the same menu of incentives for police officers outlined in Recommendation 27. While monetary incentives alone may not address the immediate shortage of dispatchers, they should help attract more candidates in the short term.

In the longer term, the SRPD should look to establish a regular pipeline of job candidates for dispatch positions. One approach would be to expose young people still in high school to a career in police dispatch through a "junior academy" program.[123] The Department could also explore a partnership with Scottsdale Community College to create a certificate program in police communications and then reimburse the tuition costs of candidates who successfully complete the program and join the SRPD. As noted earlier, the Leech Lake Band of the Ojibwe, has used this type of model for officer recruitment and education, teaming up with the Leech Lake Tribal Community College for a specialized criminal justice program among the area's multiple tribes.[124] The Department could also target recruitment efforts to "non-traditional talent," such as employees currently working in customer service in the private sector.[125]

Recommendation 29. The SRPD should launch a multi-pronged campaign to attract more Community members to positions in the SRPD – both sworn and professional staff.

Many of the Community members our team spoke with expressed a strong desire to see more SRPMIC members in the Police Department. Achieving this goal will take time and persistence, but the SRPD should start now. The campaign may include elements such as the following:

· **Increasing the police presence in the schools, with both dedicated School Resource Officers and other police personnel who regularly**

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[123] *See* DC.gov, Office of Unified Communications, OUC Junior Academy, https://ouc.dc.gov/page/junior-academy (last visited Sept. 19, 2023).

[124] Center for American Progress, "A Minnesota Tribal College Teaches Law Enforcement to Put More Native Americans Behind the Badge" (Dec. 2022), https://www.americanprogress.org/article/a-minnesota-tribal-college-teaches-law-enforcement-in-effort-to-put-more-native-americans-behind-the-badge/.

[125] 911.gov Connects, "Facing Staffing Challenges, Industry Stakeholders Share Tips to Attract and Retain Telecommunicators" (Feb. 2023). https://www.911.gov/newsletters/issue-13/facing-staffing-challenges-industry-stakeholders-share-tips-to-attract-and-retain-telecommunicators/

participate in school-related activities. Establishing strong bonds with young people at an early age can be a key factor in getting them to consider a career in policing later in life. The Prairie Band Potawatomi Tribal Police Department in Kansas works with the local public elementary, middle, and high schools that tribal youth attend. Their programming includes dedicated School Resource Officers, instruction in the G.R.E.A.T. (Gang Resistance Education and Training) curriculum, and a Police Explorer post.[126] The SRPD has one School Resource Officer, who is well regarded in the Community. The Department should work to build on that foundation.

- **Re-establishing a Police Explorers post that gives interested young people an inside look at policing and fosters their interest in future career opportunities.** Law Enforcement Exploring is a hands-on program for young people (usually middle-school through high-school age) who may be interested in a career in policing. Sponsored by local police agencies, the Explorers program offers training and practical experiences in law enforcement and promotes personal growth through character development and citizenship.[127] The Lansing, MI Police Department has found success in recruiting police officers from the local community through a vibrant youth outreach and Explorers program.[128] The SRPD had an Explorer post at one time, but it has lost momentum in recent years. To help with recruitment and engage better with young people, the Department should invest the personnel and resources to restart the program.

- **Taking on more summer job program youth and giving them diverse and meaningful assignments in the Department.** The SRPD already hosts some Community members under the SRPMIC summer job program. The Department should look to expand that number in the future and work to ensure that young people's interests are aligned with the assignments they are given.

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[126] U.S. Department of Justice, Office of Community Oriented Policing Services and International Association of Chiefs of Police, *Promising Practice in Tribal Community Policing* (Dec. 2016), https://www.theiacp.org/sites/default/files/all/t/TribalCommunityPolicing.pdf.

[127] *See* Exploring.org, Law Enforcement Exploring, https://www.exploring.org/law-enforcement/ (last visited Sept. 19, 2023).

[128] Kaye Berg, "As Police Officer Recruitment Faces 'Looming Crisis,' Departments Turn to Teenagers," *Lansing State Journal* (May 13, 2019), https://www.lansingstatejournal.com/story/news/2019/05/13/police-department-recruit-jobs-explorer-apply-lansing-dewitt-msp/1152560001/.

- **Offering a range of internships year-round to Community members interested in police work.** Internships are a way to provide work experience and exposure to Community members throughout the year. Again, it is key to match Community members' interests with their internship assignments within the Department. And after Community members have completed their internships, the SRPD should follow up with qualified candidates to gauge their interest in joining the Department.

- **Exploring the creation of a Police Cadet program that would provide Community members with paid, part-time, non-sworn positions while they are completing their education.** Many police agencies have found that Police Cadet programs can provide a steady pipeline of local talent into their departments.[129] Under these programs, young people (typically ages 17 and up) work a part-time job in the police department while they continue their education, often at a local community college. The departments typically cover the Cadets' educational costs. Upon successful completion of the program, Cadets are fast-tracked into the hiring process for full-time officers. The SRPD could explore a partnership with a local higher education institution, such as Scottsdale Community College, to provide a custom-designed program of classes for the Police Cadets.

In its efforts to attract Community members, the SRPD should find ways of prominently including and featuring current personnel – especially Department leaders such as Commander Walter Holloway – who are Community members. They can serve as role models and honestly address questions and concerns Community members may have about careers in the SRPD.

The Department also should dedicate resources to help Community members navigate the application and hiring process. The SRPD indicates that it has hosted a preparatory and coaching class designed to help potential applicants understand and prepare for the hiring process. This class should be offered on a regular basis going forward.

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[129] *See, e.g.*, JionMPD.dc.gov, Metropolitan Police Department Cadet Corps, https://joinmpd.dc.gov/metropolitan-police/cadet (last visited Sept. 19, 2023).

VIII. TRAINING

All SRPD recruits complete their initial Arizona POST-required training at a neighboring agency, usually the Maricopa County Sheriff's Office or Mesa Police Department. Upon graduation, recruits complete a two-week Advanced Officer Training course that focuses on SRPD-specific policies and procedures. Then, officers undergo field training with an experienced training officer.

The Department also offers a robust program of annual in-service training for experienced officers. Required training includes 12 hours of instruction mandated by Arizona POST, plus regular firearms qualifications and courses mandated by ALEAP (Arizona Law Enforcement Accreditation Program). In 2022, the SRPD started publishing an annual training calendar of both required and optional courses taught by the SRPD and available to members. The Department also has a process for personnel to request and receive approval for courses taught by outside organizations; these outside courses are not routinely published in the training calendar.

In addition, the SRPD Training Unit produces one to two Training Briefs each week, which are distributed electronically to Department members via the

PowerDMS system. The Training Briefs cover a mix of new policies and ongoing operational issues. To promote understanding and retention, they generally include a question-and-answer-style quiz at the end. Sergeants are expected to go over the Training Briefs in roll call briefings.

Today, SRPD members are expected to complete approximately four (4) hours of in-service training a month – both required and optional courses. That is four times the amount of training required by Arizona POST and exceeds the in-service training requirements of most states.[130]

The Training Unit told 21CP that training in the SRPD has come a long way in recent years. In 2019, the Unit included only one training coordinator, and in-service training consisted of the bare minimum of Arizona POST-required training and firearms qualification. Today, the Unit has two training coordinator officers, plus strong leadership from the sergeant (who has other responsibilities besides training) and dedicated administrative support. This has allowed the Training Unit to increase the number of in-service training courses it offers, identify and certify internal instructors to teach those courses, and implement innovations such as the weekly Training Briefs. SRPD officers and supervisors generally agreed in interviews with 21CP that training in the SRPD has improved markedly in recent years, and the members seem satisfied overall with the quality and quantity of the training they receive.

Nevertheless, there are some training improvements that could be implemented, including a new in-house training facility that could accommodate and improve both classroom and scenario-based training.

Recommendation 30. As highlighted in previous recommendations, the SRPD should expand or enhance its training in the following areas:

- **In collaboration with Community members, Council leaders, and outside organizations, the SRPD should create a comprehensive, immersive, and ongoing education program covering the history, culture, and traditions of the SRPMIC (Recommendation 1(a)).** This instruction should be mandated for both recruits in their Advanced Officer Training and experienced officers as part of their in-service training. The training should be updated on a regular basis and included in the SRPD's annual training calendar.

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[130] Institute for Criminal Justice Training Reform, State Law Enforcement Training Requirements, https://www.trainingreform.org/state-police-training-requirements (last visited Sept. 19, 2023).

- **To support its Department-wide approach to community policing, the SRPD should provide instruction to both police personnel and Community members on how to work collaboratively to solve crime and public safety problems (Recommendation 2(b)).** This training should be interactive and hands-on, and it should focus on how to use the SARA Model (Scan, Analyze, Respond, Assess) to solve neighborhood crime problems.

- **The SRPD should incorporate more scenario-based exercises into its use-of-force and de-escalation training (Recommendation 18).** Scenario-based training, which uses live actors as role players, can help officers better manage interactions, improve their decision making in high-stress encounters, and minimize the use of force.

Recommendation 31. The SRPD should expand the training it provides to new officers in certain key administrative functions such as Records, Property and Evidence, and Emergency Communications.

New recruits receive a few hours of instruction during their Advanced Officer Training (AOT) on how to access records, log property and evidence, and work with the emergency communications center. Personnel in these areas who were interviewed by 21CP said that this training is inadequate for new officers about to hit the streets. Administrative personnel felt that the lack of initial training carried over into officers' careers in patrol. Some indicated that officers who had been on the job for several months or even years did not always know how to handle certain routine requests.

The SRPD should look to broaden the instruction on these topics that new recruits receive during AOT. The Department also should carve out time during field training for additional, hands-on instruction on using these internal resources. In addition, the Training Unit should create more Training Briefs or video tutorials for all personnel on how to complete various processes involving these administrative functions.

Recommendation 32. The SRPD should ensure members are aware of the outside training opportunities that are available and that the process for reviewing and approving outside training is fair and equitable.

As noted above, the SRPD generally does not include outside training opportunities in its annual training calendar. As a result, personnel who could benefit from certain training opportunities beyond what is offered within SRPD may not be aware of what is available. While it would be impossible to include every possible training class in the calendar, the Training Unit could focus on including courses that are applicable to the SRPD mission and that are nearby and affordable.

Some personnel interviewed by the 21CP team felt that the process for reviewing and approving outside training was not always fair or equitable. Some sworn members said that certain officers were routinely approved for outside training that was not directly related to their roles and responsibilities. As a result, they said, other officers could not attend outside training that may have been more applicable. Some non-sworn professional staff interviewed by 21CP said they were not always considered or included in outside training. The SRPD should review its current process for reviewing and approving outside training and ensure that the process is fair and equitable.

Recommendation 33. Once its Community education program is operational, the SRPD should offer cultural awareness training on the SRPMIC to neighboring police agencies that routinely interact with members of the SRPMIC.

Recommendation 1(a) directs the SRPD to develop a robust and immersive education program for its members on the history, culture, and traditions of the SRPMIC. But the SRPD is not the only law enforcement agency in the metropolitan area that interacts with Community members. It is important for these other agencies to also have at least some familiarity with the people of the SRPMIC and their customs and traditions.

Once the internal education program is up and running, the SRPD should create a cultural awareness course for neighboring agencies and develop a system for delivering the training to personnel in those agencies.

The St. Regis Mohawk Tribal Police Department, New York, has implemented this type of model. The police department, which covers an area that straddles the U.S.-Canada border and works with multiple police agencies in the region, worked with the Seven Dancers Coalition, a group that seeks to restore traditional values in Indigenous communities, to develop a two-day cultural safety and awareness program for police and other criminal justice personnel in the region. More recently, the St. Regis Mohawk Police Department created a video on cultural awareness and sensitivity that is used by neighboring agencies, including the U.S. Customs and Border Patrol.[131]

Recommendation 34. The SRPD needs a new training facility for classroom instruction, scenario-based exercises, other operational (hands-on) training,

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[131] See New York State Coalition Against Sexual Assault, Cultural Safety Training for Law Enforcement and Court Personnel (Akwesasne), https://www.nyscasa.org/event/cultural-safety-training-for-law-enforcement/ (last visited Sept. 19, 2023).

and driving instruction. Securing a new training facility should be a priority for the SRPMIC Council.

The SRPD lacks both dedicated classroom space and areas to conduct operational (hands-on) training. It also does not have an adequate facility to conduct driving instruction. As a result, the Department either has to make do with the space it has, or it has to "beg or borrow" from other agencies to get space for the classes it wants to offer. In addition, because the SRPD does not have consistent facilities for conducting training, the Department frequently has to borrow basic items such as training mats. Also, the classroom space the SRPD does have access to is not always designed or equipped with the technology and layout to support adult learning principles.

As the SRPD works to implement a Department-wide philosophy of community policing, its training needs will grow dramatically. The Department will need adequate space to conduct scenario-based exercises for use-of-force and de-escalation instruction, as well as other hands-on training. It will also need facilities that can accommodate joint training of police officers and Community members. Building a new police training facility should be a priority in the SRPMIC's plans for SRPD facilities (see Recommendation 25).

No	Recommendation	Timeline	Status
1.	The SRPD should embrace community policing as a department-wide philosophy built on the three core components of community partnerships, organizational transformation, and problem-solving	Ongoing	In Progress
1.a.	The SPRD should provide its employees with in-depth, immersive, and ongoing education on the history, culture, and traditions of the SRPMIC.	Ongoing	In Progress
1.b.	The SRPD should update Operations Order 4.24 to describe with greater specificity the Department's strategy and approach to community policing and problem-solving or supplement the order with a formal Community Policing Plan.	1-3 months	In Progress
1.c.	The SRPD should provide in-depth training on community policing and problem-solving to its employees and Community members, with a focus on how to use the SARA Model to address crime and public safety problems in each police beat.	3-6 months	In Progress
1.d.	SRPD should assign patrol officers and sergeants to the same police beats for a minimum of one year ("continuity of assignment"). These personnel form the "beat team," which is responsible for leading community policing and problem-solving efforts in that beat, under the leadership of a designated "beat team leader." Note: there are several goals to bring together: workload analysis; providing continuity of service; and understanding the policitcal climate.		Complete
1.e.	The Department should establish a formal problem-solving process on each police beat. This will entail regular meetings among the police beat team and Community stakeholders, analysis of crime trends within the beat, and the use of the SARA Model to identify and address priority crime and disorder problems.	3-6 months	In Progress
1.f.	As the SRPD rolls out its expanded philosophy of community policing, the Department should consider partnering with outside experts to assist with program design, implementation, and evaluation.		Pending
2.	To enhance its partnerships with the Community, the SRPD should provide more information, through additional communications channels, to Community members		Complete
3.	The SRPD should routinely collect feedback from the Community.	IT Approval	Pending
4.	The SRPD should create a specific order – separate from Operations Order 3.19 – that spells out the process for filing citizen complaints.		Complete
5.	The SRPD should provide the Community with clear, concise information about the citizen complaint process and make it easy for individuals to file a complaint (or compliment) about an officer. This level of transparency can help enhance the Community's understanding of and trust in the process		Complete
5.a.	SRPD should produce brochures and online materials that clearly explain the citizen complaint process and forms for filing complaints and/or commendations.		Complete
5.b.	SRPD should ensure its employees have the citizen complaint brochures and forms and that employees provide the information to individuals who ask about the complaint process		Complete
5.c.	SRPD should develop an automated process for filing a complaint or compliment online, through a secure link on the SRPD website		Complete
5.d.	SRPD should create a prominent, easy-to-locate link on the SRPD home page so the public can easily access the citizen complaint information		Complete
5.e.	All complaints about SRPD employees raised at Council meetings should immediately be referred to the SRPD complaint process so that the complaints can be quickly and thoroughly investigated		Complete
6.	The SRPD should revise the Notification of Citizen Complaint form by removing existing language about false reports		Complete

7.	In the follow-up notification to individuals who have filed a complaint, the SRPD should provide a more thorough explanation of the steps the Department took and more clearly state the outcome of the investigation		Complete
8.	SRPD should revise Operations Order 3.18: Discipline Policies and Procedures to specifically inventory the actual steps involved in the administration of discipline.		Complete
9.	The SRPD should revise Operations Order 3.19: Misconduct Investigations to provide greater clarity about the process for conducting misconduct investigations; sections not specifically related to misconduct investigations should be removed and addressed in separate orders		Complete
10.	The SRPD should publish statistical information on internal investigations, discipline, and commendations and make it available to the Community.	1-3 Months	In Progress
11.	The SRPMIC should discontinue use of the Law Enforcement Commission and replace it with a hybrid approach to civilian oversight that includes an Inspector General and a "Review-Focused Model."	Admin/Council Decision	Referred
12.	The SRPD should revise Operations Order 6.01 to provide specific guidelines on the necessary legal requirements for initiating traffic stops. SRPD should provide initial and ongoing training to officers on the revised policy and non-voluntary encounters.		Complete
13.	SRPD should collect more detailed data on traffic stops and other non-voluntary encounters so that it can be accessed and analyzed internally and also made available to the public		Complete
14.	The SRPD should conduct regular audits of its non-voluntary encounters, including traffic stops, to ensure they are following Constitutional guidelines and that officers are treating individuals with respect and in a procedurally just manner		Complete
15.	SRPD should phase out High Visibility Activities as a stand-alone initiative and direct officers' discretionary time to specific community policing and problem-solving objectives established by the police beat team and Community partners.		Complete
16.	SRPD should update the Use-of-Force Order to emphasize more strongly the sanctity of human life and the importance of de-escalation.		Complete
16.a.	SRPD's existing statement recognizing the sanctity of human life should appear more prominently at the outset of the policy		Complete
16.b.	In addition to stating that any use of force must be "objectively reasonable," the Use-of-Force Order should emphasize that all uses of force should be both "necessary" and "proportional" to the threat being faced and that no other, less intrusive option is available.		Complete
16.c.	SRPD's use of force policy should more clearly define what de-escalation is and emphasize that, whenever feasible, de-escalation is the preferred approach to situations in which the use of force may be considered.		Complete
17.	The SRPD should update the Operations Order on Tasers to more tightly control when the device can be used in "drive stun" mode.		Complete
18.	The SRPD should incorporate more scenario-based exercises into its use-of-force/de-escalation training – including training on revisions to the Department's use of-force policy made pursuant to other recommendations.	Ongoing	Complete
19.	The SRPD should publish statistical information on police officers' use of force and make it available to the Community.	1-3 Months	In Progress
20.	SRPD should revise its body-worn camera policy to expressly prohibit officers from turning off or covering up their cameras when they should be recording, unless there are extreme exigent circumstances.		Complete
21.	The SRPD should revise its policy on body-worn cameras to require Special Operations Unit personnel to wear and activate body-worn cameras in most situations.		Complete

22.	The SRPD should explore technical options to enable the expanded use of BWCs during tactical operations.		Complete
23.	The SRPD should establish a regular and rigorous schedule for auditing body-worn camera footage.		Complete
24.	SRPD should communicate updates to its body-worn camera policies and procedures to all SRPD personnel.		Complete
25.	The SRPMIC should conduct a comprehensive assessment of the facilities needs of the SRPD and develop both short- and long-term plans for upgrading key facilities. Construction of a new, technologically advanced public safety building that brings together key SRPD management, operational, training, and community policing and engagement functions in one facility should be a priority.	Admin/Council Decision	Pending
26.	The SRPD should update its recruitment materials to provide a more realistic, Community-centered view of policing that may appeal to a broader range of job candidates, in particular Millennials and members of Generation Z.	Ongoing	In Progress
27.	The SRPD should expand recruitment incentives for police officers beyond the cash bonus, to include other forms of employee assistance and a greater focus on employee wellness.	Admin Approval	Pending
28.	To address the immediate shortage of dispatch personnel, the SRPD should establish a cash bonus and offer other short- term recruitment incentives. For the longer term, the Department should work to establish a more reliable pipeline of job candidates.		Complete
29.	The SRPD should launch a multi-pronged campaign to attract more Community members to positions in the SRPD – both sworn and professional staff.	Ongoing	In Progress
30.	As highlighted in previous recommendations, the SRPD should expand or enhance its training in the following areas:		
30.a.	In collaboration with Community members, Council leaders, and outside organizations, the SRPD should create a comprehensive, immersive, and ongoing education program covering the history, culture, and traditions of the SRPMIC (Recommendation 1(a)).	6-9 months	In Progress
30.b.	To support its Department-wide approach to community policing, the SRPD should provide instruction to both police personnel and Community members on how to work collaboratively to solve crime and public safety problems (Recommendation 2(b)).	6-9 months	In Progress
30.c.	The SRPD should incorporate more scenario-based exercises into its use-of-force and de-escalation training (Recommendation 18).	Ongoing	Complete
31.	The SRPD should expand the training it provides to new officers in certain key administrative functions such as Records, Property and Evidence, and Emergency Communications.		Complete
32.	The SRPD should ensure members are aware of the outside training opportunities that are available and that the process for reviewing and approving outside training is fair and equitable.		Complete
33.	Once its Community education program is operational, the SRPD should offer cultural awareness training on the SRPMIC to neighboring police agencies that routinely interact with members of the SRPMIC.		Complete
34.	The SRPD needs a new training facility for classroom instruction, scenario-based exercises, other operational (hands-on) training, and driving instruction. Securing a new training facility should be a priority.	Admin/Council Decision	Referred