

DRAFT INDEPENDENT  
COMPREHENSIVE STATUS  
REPORT ON POLICE STUDIES  
AND RECOMENDATIONS

AUGUST 11, 2020



**CITY OF GRAND RAPIDS**  
OFFICE OF OVERSIGHT & PUBLIC ACCOUNTABILITY

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Grand Rapidians,

In August of 2019, the Office of Oversight and Public Accountability (OPA) was established to build bridges to trust between community and public safety by increasing transparency and accountability in the City's public safety operations. For many years prior to the establishment of OPA, the City has engaged with community and other stakeholders regarding police and community relations in Grand Rapids. As part of that work several recommendations studies and taskforces were commissioned. The City of Grand Rapids has had the benefit of the following reports, studies, and commitments that were specifically related to policing/community and police relations in Grand Rapids:

1. the 12 Point Plan [2015]
2. the Grand Rapids Police Department Task Force on Police Policies and Procedures Report [2017] (21CP Report)
3. the Lamberth Traffic Stop Study [2017] (Traffic Stop Study)
4. the Hillard-Heintze Staffing and Deployment Study [2019] (Deployment Study)

In addition to the four aforementioned studies, reports, and commitments, the City also had the benefit of the Safe Alliances for Everyone Anti-Violence Strategy Report and Recommendations [2015] (SAFE Report) which was a report on recommendations for violence reduction in Grand Rapids. In 2019, the City adopted its Strategic Plan. The City's Strategic Plan is intended to detail the City's priorities and serve as a guide to City investments and operations.

The primary purpose of this report is to provide an update regarding the status of past recommendations. Transparency and accountability are important pillars in building trust. This Independent Comprehensive Status Report on Police Studies and Recommendations (2020 Comprehensive Report) is an important step toward increasing accountability and transparency in our public safety operations.

In the 2020 Comprehensive Report, OPA has made recommendations regarding some of the items in past reports. However, this 2020 Comprehensive Report is not intended to become the GRPD's strategic operational plan. Alternatively, this 2020 Comprehensive Report should be used as a reference point regarding the status of past studies. The information contained therein should be considered, and in many cases, adopted by GRPD.

With the exception of items contained in the City's Strategic Plan, this 2020 Comprehensive Report lists the recommendations from past studies and recommendations regarding policing, and provides findings related to action taken by the City and a status update. The City's Strategic Plan was specifically designed to guide the operations of the City from FY 2020 – FY 2023. As such, the City will provide an update on the status of the City's Strategic Plan at another time. The status updates in this report are broken down into 5 categories:

- **Completed** – This recommendation or similarly purposed actions have been fully implemented in City/Public Safety Operations.
- **Significant Progress** – Significant Progress has been made toward the full implementation of this recommendation in City/Public Safety Operations.
- **Some Progress** – Some Progress has been made toward the full implementation of this recommendation into City/Public Safety Operations.
- **Minimal Progress** – Minimal Progress has been made toward the full implementation of this recommendation into City/Public Safety Operations.
- **Nominal/No Progress** – Either no progress or an insignificant amount of progress has been made toward the implementation of this recommendation.

When performing an independent audit or analysis, it is better to produce a report that results in an unqualified opinion. An unqualified analysis indicates that the source data that is needed to produce the analysis/opinion was fairly and accurately presented to the auditor. Alternatively, a qualified audit suggests that there are issues with the data or data control that was used to prepare the report. Unfortunately, the findings and status update contained in this report must be classified as a **qualified analysis**. There were significant issues with how GRPD has recorded data related to these items. Additionally, I struggled to obtain the necessary information and supporting documentation from GRPD. To some extent, the passage of time played a part in the difficulties presented in obtaining supporting documentation. However, throughout the process of preparing this report, it was abundantly clear that the preparation of this report was not a priority of the GRPD Office of Research and Planning. Eventually, responses were provided to OPA regarding most of the recommendations, however many of those responses were vague, irresponsive to the inquiry, and/or lacking supporting documentation as requested. Grand Rapids Police Department is both the subject of the analysis (recommendations are primarily geared toward GRPD) and the keeper of the record (reporting source). If additional information was provided or greater effort was placed into explaining GRPD's position on many of these recommendations, the ultimate findings and status may have been different. Improved GRPD records management is necessary to ensure greater accountability. For all of these reasons, this Comprehensive Report is a qualified analysis.

The Grand Rapids Police Department continues to be recognized as an excellent police department based on many national standards. GRPD maintains accreditation through the Commission on Accreditation of Law Enforcement Agencies. Only 5% of police departments across the nation have obtained this level of accreditation. While this accreditation evidences GRPD's achievements based on traditional policing standards, it should not be used to undervalue or silence the recommendations that have been provided to GRPD from community through several years of discussion related to police and community relations. Reimagining policing in Grand Rapids will undoubtedly require courageous leadership and innovative approaches to public safety.

Since the commissioning of all of the studies referenced above, there have been significant changes in the leadership of public safety operations. In 2018 City Manager Washington united with the City. In 2019 Chief Payne was appointed as Police Chief. In 2020 I was officially hired to serve as Director of Oversight and Public Accountability. These studies and recommendations have been considered in the creation of the City's Strategic Plan, the GRPD's new Strategic Plan and OPA's Strategic Plan. Those Strategic Plan's will be used to guide public safety operations in both OPA and GRPD, respectively. (This 2020 Comprehensive Report was drafted prior to the release of the GRPD's new Strategic Plan.) I am supportive of Chief Payne's decision to cast his vision for the GRPD and I am supportive of any changes that help increase accountability and transparency and help to make Grand Rapids a place where all people feel safe and are safe at all times. However, before moving forward we must be accountable for the recommendations and commitments of the past. This 2020 Comprehensive Report is an important step in accomplishing that goal.

In Service,

Brandon D. Davis, Esq.

Director of Oversight and Public Accountability

# The 12 Point Plan

Summary: In 2015, The City of Grand Rapids Created its 12 Point Plan. The 12 Point Plan was intended to improve community relations with police. In many ways, this plan was created in response to community concerns related to the death of Michael Brown, a black teenager that was killed by a police officer in Ferguson, MO and the failure of a Missouri grand jury to issue an indictment against the officers that killed him. This killing received national attention and highlighted the need for greater accountability across the nation, including in Grand Rapids. More detailed information regarding this study can be found at [www.grandrapidsmi.gov/OPA](http://www.grandrapidsmi.gov/OPA).

# The 12 Point Plan

## **Recommendation 1**

**Review all Police and Fire hiring practices to ensure a diverse workforce.**

Findings: The GRPD worked with the City's Human Resources department to perform an examination of the GRPD hiring process and remove some of the automatic disqualifiers that were barriers to the hiring of under-represented populations. Since that time, the MCOLES has increased its list of automatic disqualifiers. Through the good work of Lt. Obrien, the Community Engagement Unit, and Human Resources, GRPD has created a recruitment plan and is working to increase diversity in the GRPD.

Since 2017, GRPD has hired 81 police officers. Of the 81 new hires, 28 (34.57%) of those individuals are women. This increase evidences a significant improvement in recruitment and hiring practices of GRPD as it relates to gender diversity. However, the GRPD has not been nearly as successful at hiring racially diverse candidates. Of the 81 new hires, only 2 individuals are Asian (2.47%), 6 (7.41%) are LatinX and 7 (8.64%) individuals are African American. Notably, there have been no African Americans hired in the last 4 hiring classes.

Status: The GRPD has made **Significant Progress** in improving its hiring practices to ensure gender diversity. The GRPD has made **Minimal Progress** in improving its hiring practices to ensure racial diversity.

## **Recommendation 2**

**Create additional opportunities for Police Chief and service area Captains to regularly engage with community.**

Findings: The GRPD created the Community Engagement Unit (CEU) in 2017 to increase and coordinate opportunities for all levels of GRPD personnel to engage in positive, non-enforcement contacts with the public. GRPD participates in approximately 230 non-enforcement activities annually. The CEU is a significant resource that helps to coordinate non-enforcement contacts with the public. It should be noted that since becoming police chief, Chief Payne has been noticeably present at community events in a non-enforcement capacity. Although this progress is promising, significant effort needs to be made in increasing non-enforcement interactions between GRPD and community.

Status: **Significant Progress** has been made in relation to the Police Chief's interactions with community. **Some Progress** has been made in relation to the GRPD's (as a whole) interactions with community.

# The 12 Point Plan

## Recommendation 3

**Mandatory cultural competence and implicit bias training for all police officers.**

Findings: Since 2016, GRPD has had all personnel trained in implicit bias. Some training has been presented by outside experts, and other training has been provided by GRPD personnel trained by Lamberth Consulting as Implicit Bias instructors and/or by Fair & Impartial Policing to spearhead the department's program and efforts. Officers receive a minimum of 3 hours of training on this topic annually. GRPD was unable to provide the exact amount of training that is given to these topics annually. The amount of training given related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their biases in order to serve impartially. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics.

Status: Although implicit bias training is now mandatory, **Minimal Progress** has been made in ensuring that adequate training is given on these topics.

## Recommendation 4

**Develop Police Department Strategic Plan that provides framework for strengthening community and police relations.**

Findings: The GRPD is scheduled to release its Draft Strategic Plan on or before August 11, 2020. The completion of the plan will be a significant accomplishment for GRPD. Until very recently, minimal progress had been made on this recommendation. However, GRPD has been working on its strategic plan for the last several months. Based on information and belief, significant work has gone into the creation of the GRPD Strategic Plan. In order for this recommendation to be completed, a thorough review of GRPD's Strategic Plan needs to occur and the plan must be implemented by the department.

Status: **Significant Progress** has been made toward the completion of GRPD's Strategic Plan.

## Recommendation 5

**Phased implementation of body worn cameras (BWC) for police officers.**

## The 12 Point Plan

Findings: The department has instituted an agency wide BWC program where every sworn officer has their own camera assigned to them. In-car video cameras have also been upgraded so that both cameras are on the same system. The program began in 2016 and is ongoing. This is a significant achievement for the GRPD. Body cameras and in-car video are essential tools in increasing accountability.

Status: **Completed**

### Recommendation 6

**Develop protocols for body cameras.**

Findings: GRPD has implemented policies and retention schedules related to body worn cameras. Additional steps should be taken to increase transparency with video recordings. Whereas privacy interest of employees should be considered, the safety and trust of Grand Rapidians must be prioritized. GRPD should consider reducing requirements related to obtaining video and should also review its policy related to an officer's ability to turn off the video during tactical conversations with other officers. GRPD should consider pre-release redaction as an alternative strategy.

Status: Protocols for body worn cameras have been **Completed**, but should be revised to promote greater transparency and trust.

### Recommendation 7

**Hire consultant to review disparities in arrests.**

Findings: To date, an arrest disparities study has not been commissioned. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in arrests and will conduct this analysis going forward.

Status: **Nominal/No Progress**

### Recommendation 8

**Hire consultant to conduct race-based review of traffic stops.**

Findings: Lamberth Consulting was hired to perform a race-based review of traffic stops in Grand Rapids. The report concluded that when disaggregated by race, there were significant disparate outcomes on traffic stops. Additional information regarding this study is provided in greater detail later in this report. Notably, the Office of Oversight and Public Accountability has recently been charged with reviewing disparities in traffic stops and will conduct this analysis going forward.

# The 12 Point Plan

Status: **Completed**

## **Recommendation 9**

**Work with Community Relations Commission to review City's Diversity and Inclusion policies and practices.**

Findings: The Community Relations Commission reviewed the City's Diversity and Inclusion policies and practices. Additionally, GRPD reviewed their policies and procedures based on the standards of the Commission for Accreditation of Law Enforcement Agencies (CALEA). GRPD currently holds CALEA certification.

The Office of Oversight and Public Accountability has recently been tasked with reviewing all of GRPD's policies and procedures including the policies and procedures including, but not limited to GRPD's diversity and inclusion policies.

Status: **Some Progress**

## **Recommendation 10**

**Develop Acquisition and Use of Surveillance Equipment policy to protect citizens' privacy amid increased use of new surveillance technology.**

Findings: The City instituted Administrative Policy 15-07 regarding electronic surveillance. Before implementing new technology such as, Unmanned Aerial Systems (UAS), GRPD should work in partnership with stakeholders to create strong policies and guidelines regarding the use of that technology.

Status: **Completed**

## **Recommendation 11**

**Develop protocols for outside agencies to investigate any police officer involved shooting.**

Findings: The City adopted an administrative policy stating that officer involved shootings will be investigated by the Michigan State Police (MSP). Since the implementation of this policy, five uses of deadly force have been reviewed by MSP. None of those investigations have resulted in criminal charges of police officers. In addition to the investigation by MSP, The Office of Oversight and Public Accountability has recently been tasked with responding to the scene of all officer involved shootings and monitoring those investigations to ensure greater transparency and accountability.

Status: **Completed**

# The 12 Point Plan

## **Recommendation 12**

**Launch public education campaign about citizens' right to use internal investigative process and Civilian Appeals Board.**

Findings: Pamphlets and online information have been prepared and provided to the public regarding the Civilian Appeal Board and its role in City operations. The pamphlets and online information were important first steps, but it does not constitute a public education campaign. The Office of Oversight and Public Accountability was recently tasked with evaluating Civilian Appeal Board operations and developing a comprehensive public safety community engagement strategy which will include Civilian Appeal Board operations.

Status: **Minimal Progress**

# The Lamberth Traffic Stop Study

Summary: After being contracted by the City of Grand Rapids, in 2017 Lamberth Consulting released a report evaluating racial disparities in Grand Rapids traffic stops. To put it plainly, the study found that Black motorists were stopped more frequently than would be expected based on the number of Black drivers in the traffic stream. The study also found that Black drivers are over-searched during traffic stops. More detailed information regarding this study can be found at [www.grandrapidsmi.gov/OPA](http://www.grandrapidsmi.gov/OPA).

# Traffic Stop Study

## Recommendation 1

GRPD should have the stop and search data for 2016 analyzed as soon as possible to determine whether:

- A. The increases in stops of Black motorists continued during that year.
- B. There is any evidence that the City Mangers 12 point plan appeared to influence GRPD officers to reduce searches as posited by a GRPD spokesman for 2015.
- C. There were any other changes from earlier years in the stopping patterns of GRPD.

Findings: This recommendation was not prioritized by GRPD. An arrest disparities study has not been commissioned. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in arrests and will conduct this analysis going forward.

Status: **Nominal/No Progress**

## Recommendation 2

GRPD should make public their stop data with an analysis each year for at least the next 4 years. The existing benchmarks should not present a problem. Our previous experience leads us to believe that the benchmarks used in this report are good for the next 4 to 5 years.

Findings: GRPD annually provides information regarding stop data as part of the process of maintaining CALEA certification. Although some data regarding the number of traffic stops conducted is available in GRPD's Annual Reports, significant analysis is needed regarding racialized outcomes in order to properly quantify any progress that has occurred since the last Traffic Stop Study. Additionally, data needs to be provided to the public in a manner that is readily accessible and understandable. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in traffic stops and will conduct this analysis going forward.

Status: **Nominal/No Progress**

## Recommendation 3

GRPD should immediately begin a comprehensive review of its policies and procedures to determine whether any of these administrative tools contribute to the over stopping of Black motorists.

- A. The review should be conducted by a group that consists of the Chief, Command Staff, representatives, other supervisory levels and officers as well as at least one external policing expert. In addition, this group should include one or more members of the Grand Rapids community.
- B. Being cognizant of the unintended consequences of an earlier policy decision, changing the recording of race/ethnicity to simply race as was detailed in this report, all policies and procedures should be scrutinized to determine their effect on minority motorists.

# Traffic Stop Study

Findings: The City contracted C1CP, a consultant, to work with a taskforce comprised of GRPD Staff and community members to examine all GRPD policies to determine if any administrative tools contribute to the over stopping of Black motorist. The GRPD Taskforce on Police Policies and Procedures made 38 recommendations to improve policing in Grand Rapids. However, this report did not directly answer the question of whether or not polices and procedures contribute to the over stopping of Black motorists. The Office of Oversight and Public Accountability has recently been charged with reviewing GRPD polices and procedures to evaluate the racial equity impacts of all public safety policies and initiatives.

Status: **Significant Progress**

## Recommendation 4

The GRPD Should carefully review its data collection efforts to assure that relevant data is accurately recorded. These efforts should attend to the following:

- A. Accurately recording race and ethnicity of motorist
- B. Collecting more data on post stop activity, e.g. were motorist asked to exit their vehicles and/or were they handcuffed
- C. Revising the type of stop data to be more inclusive of the type of moving or equipment violations recorded.
- D. When the motorist, passenger of vehicle is searched, the results of these searches should be recorded.

Findings: The GRPD collects some relevant data. However, additional data and disaggregation should be gathered. Based on information and belief, GRPD is aware of the need to collect additional data and is currently working on improvements to its Records Management System. The inability to retrieve this data in the form of a report or as supporting documentation to prepare this Comprehensive Report evidences a lack of progress in this area.

Status: **Minimal Progress**

## Recommendation 5

GRPD should assess and evaluate its training offerings for ensuring that their staff engage in bias free policing. All levels of GRPD sworn and unsworn personnel should have regular bias free policing training that incorporates implicit bias subject matter.

- A. All officers should receive the full training session(s) within their first year of employment with GRPD and participate in a “re-fresher” session at least once every 2 years.
- B. Included in the training sessions should be a discussion on the GRPD’s hit rate (instances where contraband is located incident to a search) for GRPD for all motorists to assure

# Traffic Stop Study

that officers understand that over stopping/over searching either Black or Hispanic motorist does not increase the rate that contraband is found.

- C. The training should emphasize that biased based policing, including the targeting of minority motorist is deleterious to efforts to achieve cooperation between community members and GRPD.

Findings: Since 2016, GRPD has had all personnel trained in Implicit Bias. Some training has been presented by outside experts, and other training has been provided by GRPD personnel trained by Lamberth Consulting as Implicit Bias instructors and/or by Fair & Impartial Policing to spearhead the department's program and efforts. Although it is difficult to quantify, officers receive a minimum of 3 hours of training on this topic annually. The amount of training given related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their bias in order to serve impartially. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics.

Status: Although implicit bias training is now mandatory, **Minimal Progress** has been made in ensuring that adequate training is given on these topics.

## Recommendation 6

GRPD should assess and evaluate its staff reward and recognition program as well as their promotion practices to determine if they have a practice of promoting and or honoring individuals whose behavior and performance support outcomes that result in disparate treatment of racial/ethnic or gender minorities.

When asked about this recommendation, GRPD indicated that the department entered into an agreement with the Unions to allow personnel who pass promotional exams to remain on the list for three years instead of having to retake the promotional exam every time that the exam is offered. Additional evaluation of GRPD's reward and promotional policies is warranted. GRPD should employ efforts to diversify its Command Staff.

Status: **Minimal Progress**

## Recommendation 7

GRPD should assess and evaluate its Field Training Officers (FTOs) to assure that they are not avertedly or inadvertently training new officers in practices that result in the targeting of minority motorist.

# Traffic Stop Study

The GRPD evaluated its Field Training Officers based on the standards of the Sokolove Field Training Officer program. GRPD follows the FTO Training program administered by Sokolove. Additionally, the GRPD conducts FTO development training every 3 years. GRPD did not provide detailed information that explains how GRPD avoids avertedly or inadvertently training new officers in practices that result in the targeting of minority motorists.

Status: The amount of documented progress related to this recommendation is insufficient, however **Some Progress** has occurred.

## Recommendation 8

**GRPD should assess and evaluate the training given to FTOs to assure that these officers are aware of the need to protect against bias based policing.**

The GRPD evaluated its Field Training Officers based on the standards of the Sokolove Field Training Officer program. GRPD follows the FTO Training program administered by Sokolove. Additionally, the GRPD conducts FTO development training every 3 years. GRPD did not provide detailed information that explains how GRPD avoid avertedly or inadvertently training new officers in practices that result in the targeting of minority motorists.

Status: The amount of documented progress related to this recommendation is insufficient, however **Some Progress** has occurred.

## Recommendation 9

**GRPD should assess and evaluate its early warning system to determine which officers are stopping and/or searching minority motorist at higher rate than their peers.**

Findings: To date, this recommendation has not been implemented.

Status: **Nominal/No Progress**

## Recommendation 10

**GRPD should immediately begin a process of bringing officers and citizens together to discuss this report and the larger issue of minority and police relations. This is a difficult conversation and should be conducted by trained facilitators who have facilitated these types of engagement efforts previously.**

Findings: After the completion of the Lamberth Report, the GRPD participated in discussions with community and other City leaders regarding the Lamberth report. These conversations were in the form of listening sessions. Sometime later, GRPD attempted additional engagement

## Traffic Stop Study

with its Policing at the Speed of Trust Program. While well intentioned, the Speed of Trust program did very little to address the issues that exist between police and minority motorist.

Status: **Some Progress**

### Recommendation 11

GRPD should, in cooperation with a local group with expertise in community surveying, begin to survey the community on a regular basis to obtain feedback from citizens. This effort should be carefully designed to tap both positive and negative opinions and to reach all portions of the community but with special emphasis on minority groups. This should include oversampling of those groups that are hard to reach and using a Spanish language survey where appropriate.

Findings: In 2019, the GRPD contracted with ELUCD to conduct a survey to determine community sentiment regarding trust and safety. Additionally, in 2019 the City conducted a community survey that among other things, measured residents' feelings of safety. The results of these studies is available of the City's website. The City will continue to conduct community surveys.

Status: **Completed**

### Recommendation 12

Within 6 months of the release of this report GRPD should inform the Grand Rapids community which of these recommendations they intend to follow and report to the community the basis for their decision and when the results of the recommendation will be made public where appropriate. Every 6 months thereafter, the City should report to the community the outcomes of their efforts.

Findings: This recommendation was not implemented.

Status: **Nominal/No Progress.**

# The GRPD Task Force on Police Policies and Procedures Report

Summary: In 2017, the Grand Rapids Police Department Task Force on Police Policies and Procedures released a report containing 38 recommendations to improve policing in Grand Rapids. The GRPD took those recommendations under advisement and implemented some of the recommended changes. More detailed information regarding this report can be found at [www.grandrapidsmi.gov/OPA](http://www.grandrapidsmi.gov/OPA).

## 21 CP Report

### Recommendation 1.1

GRPD should conduct a comprehensive staffing and deployment analysis, including but not limited to the evaluation of the current Beat configuration, and an assessment of the current and future staffing needs (both sworn and civilian) of the Department based on service demands and the comprehensive adoption of community policing.

Findings: The City hired Hillard-Heintze to perform a comprehensive staffing & deployment study that included evaluation of GRPD's sworn and civilian staffing needs. The study was completed in April of 2019.

Status: **Completed**

### Recommendation 1.2

GRPD should develop policies that provide clear guidance to officers regarding their expected duties and responsibilities when deployed to proactive patrols and while participating in specific crime initiatives and responses.

Findings: The GRPD utilizes its Manual of Procedures to provide guidance to officers regarding their expected duties and responsibilities. Relevant policies include the Field Interrogation Policy, the Impartial Policing Policy, and the Manual of Conduct. The GRPD also utilizes a records management system (RMS) to provide officers with Service Area Referrals that provide enforcement expectations, directions, and limitations. The GRPD should consider enacting a specific policy regarding the use of Service Area Referrals.

Status: **Completed**

### Recommendation 1.3

Prior to the increasing sustained enforcement activities in a Beat or area and when it does not compromise officer safety, GRPD should conduct a public meeting in that impacted Beat or area, give the community notice of these activities, and identify expected outcomes.

Findings: In mid-2019, GRPD began making efforts to announce sustained enforcement activities by sharing information at neighborhood meetings, and in some instances even going door-to-door. GRPD should expand its system of providing notification by utilizing social media, and other communication platforms. The goal of sustained enforcement must be to reduce occurrences. Additional notice will likely aid in reducing occurrences during the sustained enforcement activity.

Status: **Some Progress**

### Recommendation 1.4

## 21 CP Report

Whenever GRPD initiates a new crime strategy or deploys additional enforcement resources, for a sustained period of time, to a Beat or specific area, GRPD should conduct a monthly evaluation – including a review of stop, search and arrests data – to identify if the activities are resulting in disparate effects by race.

Findings: Prior to the release of the 21CP Report, GRPD Command personnel attended weekly Intelligence and Operational Summary (IOS) meetings to review activity, arrests, and other pertinent information. To date, those meetings have continued. However, this weekly IOS meeting does not include a review of stop, search, and arrest data with a focus on racial disparities. The latter was a key component of this recommendation.

Status: **Nominal/No Progress**

### Recommendation 1.5

As recommended in the Lamberth report, GRPD should immediately conduct an analysis of its 2016 stop data.

To date, this recommendation has not been implemented. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in traffic stops and will conduct this analysis going forward.

Status: **Nominal/No Progress**

### Recommendation 1.6

As recommended in the Lamberth report, GRPD should expand its stop data collection in the following areas (Lambert, p. 73):

- A. Accurately record race and ethnicity of motorists;
- B. Collect more data on post stop activity, e.g. were motorists asked to exit their vehicles and/or were they handcuffed;
- C. Revise the type of stop data to be more inclusive of the type of moving or equipment violations recorded; and
- D. When the motorist, passenger or vehicle is searched, record the results of these searches.

Findings: The GRPD collects some relevant data. However, additional data and disaggregation should be gathered. Based on information and belief, GRPD is aware of the need to collect additional data and is currently working on improvements to its Records Management System. The inability to retrieve this data in the form of a report or as supporting documentation to prepare the Comprehensive Report evidences a lack of progress in this area.

Status: **Minimal Progress**

## 21 CP Report

### Recommendation 1.7

GRPD should conduct regular analyses of its stop data – both at the aggregate and individual officer’s level to ensure deployment patterns and crime strategies are not resulting in racially disparate effects.

Findings: The GRPD has not conducted regular analysis of its stop data. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in traffic stops and will conduct an analysis regarding stop data going forward.

Status: **Nominal/No Progress**

### Recommendation 1.8

GRPD should partner with a local academic institution to assist with its ongoing stop-data collection and analysis to ensure all analysis is based on credible methodologies and benchmarks.

Findings: The GRPD has not conducted regular analysis of its stop data. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in traffic stops and will conduct an analysis regarding stop data going forward.

Status: **Nominal/No Progress**

### Recommendation 1.9

GRPD should participate in the “Police Open Data Initiative” facilitated by the Police Foundation and post all stop and search data and analysis publicly.

Findings: The GRPD has participated in the open data initiative, however the National Police Open Data Initiative website has not been updated to reflect the current information about GRPD. The City’s Socrata software and Police Dashboard are great tools that can be used to ensure that police/safety data is regularly accessible to the public.

Status: GRPD **Completed** the action that it needed to take regarding this item.

### **Recommendation 2.1:**

**GRPD should add clear prohibitions against conflicts of interests to existing policies.**

Findings: GRPD added language in its Internal Affairs Unit policy that forbids an investigator from handling a case if there is a conflict of interest, including a close relationship. To date, there has not been an instance in which an Internal Affairs staff member recused themselves from an investigation based on a close relationship with another officer. The subjectivizes of the conflict policy can still be the cause of significant concern. The Office of Oversight and Public

## 21 CP Report

Accountability will work to monitor and review Internal Affairs investigations in order to increase accountability and transparency.

Status: **Completed**

### Recommendation 2.2

Complaint Filing Procedure E.2 should be modified to require that police personnel who are notified by a community member that they want to file a complaint against a member must direct that complaint to Internal Affairs or an on-duty supervisor to initiate the complaint process.

Findings: GRPD's Internal Affairs Policy was modified to allow on duty supervisors to take complaints and forward the complaints to internal affairs for investigation. The Office of Oversight and Public Accountability will also have the ability to receive complaints and forward those complaints to Internal Affairs for investigation.

Status: **Completed**

### Recommendation 2.3

Filing Procedure E.2 should be revised to allow an on-duty supervisor to complete the Complaint Intake Report and, when necessary, advise Internal Affairs of any situation that requires an IA response.

Findings: GRPD's Internal Affairs Policy was modified to allow on duty supervisors to take complaints and forward the complaints to internal affairs for investigation. The Office of Oversight and Public Accountability will also have the ability to receive complaints and forward those complaints to Internal Affairs for investigation.

Status: **Completed**

### Recommendation 2.4

GRPD should develop and widely distribute across the community a "Complaint Brochure" that describes the complaint and appeal processes in a clear, concise, and accessible manner.

Findings: A brochure was created and was made available to the public both online and at locations in community. A new complaint brochure and videos that explains the role of the Office of Oversight and Public Accountability and its role in police complaint investigations will be created and disseminated in community.

Status: **Completed**

## 21 CP Report

### Recommendation 2.5

GRPD should conduct an analysis of community complaints for the past 5 years to identify any patterns and trends.

Findings: The GRPD evaluates its community complaints in order to comply with CALEA requirements and to examine the results for possible patterns and trends. The GRPD does not disaggregate the data based on the race of the complainant. The disaggregation of that data is an essential component of analyzing patterns or trends.

Status: **Minimal Progress**

### Recommendation 2.6

GRPD should complete and publish a complaint summary report on an annual basis that provides a comprehensive report and analysis of the aggregate data on complaint patterns and trends.

Findings: The GRPD evaluates its community complaints in order to comply with CALEA requirements and to examine the results for possible patterns and trends. A complaint summary report is included in some of GRPDs Annual Reports. The GRPD does not disaggregate the data based on the race of the complainant. The disaggregation of that data is an essential component of analyzing patterns or trends. GRPD should take additional action to improve its outcomes related to this recommendation.

Status: **Minimal Progress**

### Recommendation 2.7

GRPD should expand its Early Intervention System (EIS) to include stop and search data.

Findings: GRPD reports that they are currently evaluating this recommendation to determine if it is feasible. However, no action has been taken to seek Requests for Proposals or quotes regarding the expansion of the EIS.

Status: **Nominal/No Progress**

### Recommendation 3.1

GRPD should conduct an annual training needs assessment to identify continual professional training courses that includes consideration of information (and lessons learned) from community complaints and feedback, stop and search data analysis, uses of force, and assaults against officers.

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Findings: The GRPD Training Unit compiles a list of annual training opportunities (both mandatory and optional) for GRPD staff. Internal Affairs Unit trends are considered, but a thorough analysis of community complaints is necessary. Since the release of the 21 CP Report, stop and search data has not been properly analyzed by GRPD. The GRPD should regularly report how community feedback is incorporated into departmental training. Officers receive a minimum of 3 hours of training on this topic annually. The amount of training given related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their bias in order to serve impartially. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics.

Status: **Minimal Progress**

### Recommendation 3.2

**GRPD should include community members and relevant stakeholder groups in the development and presentation of officer training.**

Findings: Community input has been obtained to address community concerns resulting in the creation of the Youth Interaction Policy and the Foreign Nationals Policy. Those policies resulted in additional officer training; however, community members did not participate in the development or presentation of that training. The Chief has recently announced the creation of the Chief's Advisory Board that can be used as a resource in this area. Additionally, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have recently been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics.

Status: **Minimal Progress**

### Recommendation 3.3

**GRPD should, in partnership with the community, develop and provide training on "cultural competency" with a focus on communities that have been historically disenfranchised by law enforcement, and typically have generational mistrust with the police. These groups include, but are not limited to, immigrants, LGBTQ, and communities of color.**

Findings: Since 2016, GRPD has had all personnel trained in Implicit Bias. Some training has been presented by outside experts, and other training has been provided by GRPD personnel trained by Lamberth Consulting as Implicit Bias instructors and/or by Fair & Impartial Policing to spearhead the department's program and efforts. Although it is difficult to quantify, officers receive a minimum of 3 hours of training on this topic annually. The amount of training given

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related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their bias in order to serve impartially. Notably, the GRPD made efforts to increase cultural competency through its Policing at the Speed of Trust Program. However, the aim of the Speed of Trust Program was toward developing core skills used to build trust as opposed to working to address issues that have eroded trust between police and community. In that regard, the program was unsuccessful. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics.

Status: **Minimal Progress**

### Recommendation 4.1

The policy should contain a statement that states:

- A. A recognition that juveniles are still in the stage of developing and learning and may have already experienced trauma that is shaping their behavioral response.
- B. The formal juvenile justice process is to be avoided unless clearly indicated by the juvenile's behaviors and unless alternatives do not exist.
- C. The least restrictive alternative is used to address the juvenile problems.
- D. All juveniles are to be treated fairly regardless of race, gender, sexual orientation, ethnic and religious background, etc.

Findings: In 2019, The GRPD created and implemented its Youth Interaction Policy. The Youth Interaction Policy is a strong policy that clearly provides guidance related to interactions involving youth and police.

Status: **Completed**

### Recommendation 4.2

Prohibit the handcuffing of a child under the age of 12 unless exigent circumstances are present such as violent behavior, possession of a firearm, etc. It is important for officers to determine the context and situation when they handcuff a youth.

Findings: Although not implemented, the GRPD did thoroughly consider implementing this recommendation. Based on information and belief, the GRPD engaged in discussions with members of the community on the Policy Review Committee and determined that creating a bottom-line age was not in the best interest of youth or the policy. GRPD expressed concern regarding violating the Elliot-Larson Civil Rights Act based on age discrimination.

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Status: Although not specifically implemented, the intended result of this recommendation was accomplished through the implementation of the Youth Interaction Policy. As such, this item should be considered **Completed**

### **Recommendation 4.3:**

**The policy should require supervisors respond to the scene whenever a minor 12 or under is handcuffed.**

Findings: This recommendation was implemented as part of GRPD's Youth Interaction Policy.

Status: **Completed**

### **Recommendation 4.4:**

**If a youth has been frisked or searched, officers shall notify the youth's parent or guardian. This notification should be made within 24 hours.**

Findings: This recommendation has been implemented. Guidance related to these topics can be found in both the Youth Interaction Policy and the Field Interrogation Policies.

Status: **Completed**

### **Recommendation 4.5:**

**Policy should require officers receive cohesive training that enable officers to understand adolescent development; cultural differences among youth; mental health and trauma issues; and effective strategies for youth engagement, intervention, and crisis response.**

Findings: Officers are required to receive bi-annual training in mental health issues and ethics. GRPD failed to provide sufficient support that anything more than minimal progress has been made toward the completion of this recommendation.

Status: **Minimal Progress**

### **Recommendation 4.6**

**Clarification on how officers interact with youth, what levels of intervention they use, especially in school settings, and recognizing that police interactions can lead to trauma in children (trauma exposed children).**

Findings: The implementation of GRPD's Youth Interaction Policy has addressed many of the concerns contained in this recommendation.

Status: **Significant Progress**

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### Recommendation 4.7

Referencing General Procedures Sec. 5, Line B, “Utilizing appropriate resources, such as CPS or DART.” This needs stronger language than just “using.”

- GRPD should consider putting into place a strategy that focuses on chronic youth offenders, regardless of age. A community-team approach that involves Child Protective Services, Schools/Education/and PD. This strategy has been very effective in communities that face repeat offenders or chronic or habitual youth offenders.
- Engagement and partnership with Child Protective Services is crucial. This has been a major lesson and practice as a result of the work of the National Alliance for Drug-Endangered- Children.
- Having CPS on the ground when children are involved in an arrest environment is a proactive intervention.

Findings: GRPD reports that increased interaction and partnership with CPS has been established to address these concerns. The Youth Interaction discusses “utilizing appropriate resources, such as CPS or DART,” however no additional information has been provided to support further implementation of this item.

Results: **Minimal Progress**

### Recommendation 5.1

Recognizing that community policing works best when it is supported by elected leaders and is a subset of community-based governance; the Mayor and City Commission should adopt a Resolution that mandates community policing as the operating philosophy of the police department and require all city departments to contribute to enhance public safety through community collaboration.

Findings: The City’s Strategic Plan evidences the City’s commitment to Community Policing. Based on information and belief, the GRPD Strategic Plan will reinforce and expand the departments commitment to community policing.

Status: **Some Progress**

### Recommendation 5.2

GRPD should develop a citywide community policing plan that incorporates crime reduction strategies, community engagement and partnerships, and police department oversight.

Findings: The Office of Oversight and Public Accountability was created to increase transparency and accountability and provide oversight to the Grand Rapids Police Department. The City’s Strategic Plan evidences the City’s commitment to Community Policing. Based on information and belief, the GRPD Strategic Plan will reinforce and expand the departments commitment to community policing and improvement of crime reduction strategies. The Strategic Plan of the

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Office of Oversight and Public Accountability addresses both community engagement and creating crime reduction strategies.

Status: **Some Progress**

### Recommendation 5.3

GRPD should include community members in its ComStat process.

Finding: This recommendation has not been implemented. Although the laws and guidelines regarding information governed by the Criminal Justice Information System (CJIS) limit what can be discussed publicly, GRPD should examine the possibility of meetings with community members that do not include discussions that contain CJIS information.

Status: **Nominal/No Progress**

### Recommendation 5.4

Develop a patrol strategy that allows Beat officers time to engage with the community in non-enforcement activities (e.g., foot and bicycle patrols).

Findings: The City's Strategic Plan evidences the City's commitment to Community Policing. Based on information and belief, the GRPD Strategic Plan will reinforce and expand the departments commitment to community policing.

Status: **Some Progress**

### Recommendation 5.5

Require Problem-Oriented Policing (POP) training to all sworn officers. This training teaches officers how to solve community problems in partnership with the community and through a mode that is comprehensive and evidence-based.

Findings: GRPD Community Policing Specialists currently receive problem-oriented policing training. However, problem oriented policing training is not provided to all of GRPD's sworn officers.

Status: **Minimal Progress**

### Recommendation 5.6

Incorporate the core principles of community policing – engagement, collaboration, problem-solving, and building trust and legitimacy in annual performance evaluations for all officers.

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Findings: The GRPD officer evaluation form broadly addresses community collaboration, community knowledge, and prevention activities. The evaluation process should specifically evaluate and reward the categories listed in this recommendation with a focus on positive individual interaction with Grand Rapidians.

Status: **Minimal Progress**

### Recommendation 5.7

**GRPD Beat officers should be required, and given the time, to initiate and complete at least one POP project on a quarterly basis.**

Findings: Currently, GRPD officers are not required to initiate and complete at least one POP project per quarter.

Status: **Nominal/No Progress**

### Recommendation 5.8

**GRPD should develop a specific POP incentive program(s) that recognizes and highlights GRPD staff - both sworn and civilian - in problem-solving with the community.**

Findings: To date, this recommendation has not been implemented.

Status: **Nominal/No Progress**

### Recommendation 6.1

**The City and GRPD continue its recruitment outreach efforts with a specific focus on minority recruitment and retention.**

Findings: The GRPD and City have adopted the “Grow Your Own” philosophy to recruit local talent with a mind for service and works in partnership with the Boys & Girls Club on the Pathways to Policing Program in order to recruit from within the community. The department has also obtained greater success in obtaining diverse candidates by sponsoring police academy attendees.

Since 2017, GRPD has hired 81 police officers. Of the 81 new hires, 28 (34.57%) of those individuals are women. This increase evidences a significant improvement in recruitment and hiring practices of GRPD as it relates to gender diversity. However, the GRPD has not been nearly as successful at hiring racially diverse candidates. Of the 81 new hires, only 2 individuals are Asian (2.47%), 6 (7.41%) are LatinX and 7 (8.64%) individuals are African American. Notably, there have been no African Americans hired in the last 4 hiring classes.

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Status: The GRPD has made **Significant Progress** in improving its hiring practices to ensure gender diversity. The GRPD has made **Minimal Progress** in improving its hiring practices to ensure racial diversity.

### Recommendation 6.2

The City and GRPD continue the “Intern” program and provide sufficient resources to increase participation.

Findings: GRPD continues its intern program. Recent budget cuts have resulted in a reduction in the number of GRPD interns.

Status: **Completed**

### Recommendation 6.3

The City continues to use community members as part of the interview process of applicants.

Findings: GRPD interview panels continue to include GRPD employees, City employees, and community members.

Status: **Completed**

### Recommendation 6.4

The City consider engaging in a national recruitment effort to increase the diversity pool and outreach efforts.

Findings: This recommendation was implemented.

Status: **Completed**

# Hillard-Heintze Staffing and Deployment Study

Summary: After being contracted by the City of Grand Rapids, in 2019 Hillard-Heintze released an assessment of the staffing of the Grand Rapids Police Departments staffing levels and deployment strategy. The assessment found that GRPD's 2019 sworn staffing levels were sufficient to meet current demand. However, the study also found that limited administrative support and the absence of usable data to direct resource allocation contributes to the pressures felt by officers and managers within GRPD. The analysis recommends providing additional support through administrative staffing in order to allow officers to engage in proactive policing activities. It is reasonable to expect GRPD to have made some progress on the recommendations contained in this report. However, given the short period of time since the recommendations have been made, it is unreasonable to expect that all of the recommendations would be fully implemented at this time.

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## Recommendation 1.1

Develop a formal policing strategy that aligns resources to organizational vision. Task officers to help drive strategic goals and measure the progress towards goals under the strategic vision.

Identify core processes, such as traffic, community policing, community engagement and crime prevention and align resources to meet the strategy. Evaluate outcomes through ongoing data analysis and process improvement to drive the best allocation of resources for service delivery.

Findings: Based on information and belief, GRPD has recently begun the process of evaluating the adoption of this strategy and implementing it within its Strategic Plan. However, to date this has not been implemented.

Status: **Minimal Progress**

## Recommendation 1.2

Formalize the tasking and expectations for officers on a daily basis to maximize use of unallocated time. The GRPD is response ready, meaning that officers prioritize dispatch assignments over other tasking. Creating formal tasking plans will help to maximize officer allocation.

Findings: The GRPD utilizes a records management system (RMS) to provide officers with Service Area Referrals that provide enforcement expectations, directions, and limitations. The GRPD should consider enacting a specific policy regarding the use of Service Area Referrals.

Status: **Completed**

## Recommendation 1.3

Review calls for service to ensure officers are being sent to calls where their response supports strategic vision. The GRPD should evaluate whether assigning officers to traffic crashes that are property damage only is an effective use of police officers' time.

Findings: GRPD has researched options regarding outsourcing property damage accidents and alarms in order to reduce time on non-priority calls. However, to date no change has been made to operations in this area.

Status: **Minimal Progress**

## Recommendation 1.4

Provide civilian support staff to process traffic citations, City violation citations, and other administrative records to allow sworn officers currently doing this work the time to address

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situations that require sworn posers. This will have significant benefit in both the Traffic Unit and the Detective Unit.

Findings: One non-sworn employee has been hired to process subpoenas and allow a sworn position to be reallocated to duties that can only be performed by sworn officers. GRPD is evaluating the use of other non-sworn positions in order to reallocate other positions to that can only be performed by sworn officers.

Status: **Some Progress**

## Recommendation 1.5

**Align civilian support staff with service areas to provide appropriate data management and analysis to inform management's decision making on resource allocation, implementation of crime strategies and other administrative and operational needs.**

Findings: GRPD recently hired a non-sworn data analyst to assist with crime analysis, resource allocation and deployment strategies. It is too early to determine the benefits or results of hiring this position.

Status: **Significant Progress**

## Recommendation 1.6

**Consider implementing a continuous improvement approach to policing that identifies objectives and key results for the units under Operations and ensures shared responsibility for success, particularly around community engagement and community policing. Use management meetings to develop shared strategies and tasks and define measurements for success.**

Findings: Prior to the release of this Report, GRPD Command personnel attended weekly Intelligence and Operational Summary (IOS) meetings to review activity, arrests, and other pertinent information including creating shared strategies and tasks and define measurements for success. GRPD does maintain CALEA certification which requires department wide goal setting. Notably, GRPD was unable to provide evidence of goals that were set or evidence of how those goals, objectives, and key results are monitored. If implemented correctly, GRPD's new Strategic Plan should aid in accomplishing this recommendation.

Status: **Minimal Progress**

## Recommendation 1.7

**Expand the use of civilian parking enforcement aides, consistent with other similar police departments, to issue parking citations and to accept parking citation assignments, as this type**

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of professional staff can manage such actions effectively and allow officers to engage in direct traffic enforcement.

Findings: GRPD has worked with the City Attorney's Office and MobileGR to increase the parking enforcement authority given to Parking Services. Additional research regarding expanding the authority of Parking Services is being conducted by the City Attorney's Office.

Status: **Some Progress**

## Recommendation 1.8

Develop a staffing plan for the Records Unit to establish a Department data manager responsible for ensuring the accuracy, sufficiency, and consistency of data reporting across the department.

Findings: While this recommendation has been considered, it has not been implemented.

Status: **Nominal/No Progress**

## Recommendation 1.9

Create a Crime Analysis Unit that is staffed with sufficient resources, starting with a minimum of two or three individuals who can supply crime intelligence and analytics products across the department on a regular basis Use this unit to help inform management regarding trends, resource allocation and effectiveness of strategy.

Findings: While not formally classified as a unit, at the start of this study the GRPD had one non-sworn crime analyst. GRPD now has three non-sworn crime analysts.

Status: **Completed**

## Recommendation 1.10

Review the detective unit schedule to ensure that it aligns with organizational needs relative to demand for investigative services.

Findings: A review of the Detective Unit schedule was completed and GRPD determined that the current schedule provides the best service for the department and the community. GRPD indicated that GRPD detectives do not regularly work weekend shifts because courts are closed on weekends. GRPD should reconsider assigning detectives to weekend shifts. Whereas courts are closed- unfortunately, crime still occurs on weekends.

Status: **Completed**

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## Recommendation 1.11

Revise policy and procedures to ensure that patrol officers are not writing unnecessary reports that do not provide any policing or other value. If a report is not reviewed by anyone, that is a good indicator that it is not a necessary action for an officer to take.

Findings: This recommendation has not been implemented.

Status: **Nominal/No Progress**

## Recommendation 1.12

Determine whether the assignment of an officer to every call for service is a strategic goal. If it is, establish the resources and tasking to support this goal. If it is not, establish parameters for officer assignment and educate the community and the officers on how these services will be supplied.

Findings: GRPD did not provide a response as to whether or not it is a strategic goal for officers to respond to every call for service. GRPD utilizes interns at the front desk take many non-emergency calls and reports over the phone. Community has not been educated related to GRPD's strategic priorities.

Status: **Minimal Progress**

## Recommendation 1.13

Establish a staffing plan that accounts for the upcoming gaps in existing staff. Work to expand the current hiring goals to match the anticipated retirements. Consider an incentive by which officers announce a year in advance that they will retire to facilitate a hiring plan.

Findings: The GRPD Community Engagement Unit works with Human Resources to match hiring classes with anticipated departmental needs. Command staff regularly reaches out to retirement eligible officers to inquire about their retirement plans. No evidence was provided by GRPD to suggest that an incentive program has been created to encourage officers to announce a year in advance that they will retire to facilitate a hiring plan.

Status: **Some Progress**

## Recommendation 1.14

Conduct a skills gap analysis to ensure that officers positioned to be future leaders are trained and receive professional development.

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Findings: This recommendation has not been implemented.

Status: **Nominal/No Progress**

## Recommendation 1.15

Establish clear policies on overtime and officer rest.

Findings: Based on information and belief, GRPD is currently creating a policy to address this recommendation.

Status: **Some Progress**

## Recommendation 1.16

Provide routine command engagement with patrol and investigations through roll-calls, appearance in the field and other opportunities to engage with officers.

Findings: Command staff regularly attends roll-calls and other GRPD functions.

Status: **Completed**

## Recommendation 1.17

Develop a civilian staffing plan that prioritizes staffing in units that have a direct impact on optimal field resource allocation. Identify strategic data-led policing goals and recruit civilian staff in support of those goals.

Findings: This recommendation has not been implemented.

Status: **Nominal/No Progress**

## Recommendation 1.18

Hire additional civilian staff for the Records Unit, as the current staffing level is insufficient to ensure a professional, integrated approach to records management and the data that attaches.

Findings: This recommendation is not being implemented at this time. However, it is being considered by departmental leadership.

Status: **Nominal/No Progress**

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## Recommendation 1.19

**Develop a position catalogue with job descriptions and specific skills for each position in the GRPD. Those that do not require sworn powers should be staffed by civilians.**

Findings: A job description plan is required in order to maintain CALEA accreditation. GRPD is now in the process of creating the job description catalogue.

Status: **Minimal Progress**

## Recommendation 1.20

**Develop an organizational strategy that seeks to transition officers out of positions and tasks that are administrative and do not require sworn powers.**

Findings: The department has begun transitioning some sworn positions to non-sworn positions in order to reallocate sworn positions to perform tasks that can only be **Completed** by sworn staff. An organizational strategy regarding this recommendation has not been created.

Status: **Minimal Progress**

## Recommendation 1.21

**Adopt a work-load based model for allocating Patrol Division resources.**

Findings: Based on information and belief, GRPD is currently investigating this model.

Status: **Minimal Progress**

## Recommendation 1.22

**Closely examine the use of 4-10 work schedule, and when possible, adopt a more efficient work schedule.**

Findings: When asked about this recommendation, GRPD indicated that implementing this initiative would involve negotiations with the Labor Unions and that the Labor Unions prefer retaining their current schedule. Whereas the preference of the Labor Union is a factor that must be considered in determining what is in the best interest of the department, it should not be the sole determining factor. GRPD leadership should adopt this recommendation by reevaluating the use of 4-10 work schedules, and then take the appropriate steps to adopt the most efficient work schedule that best serves the needs of Grand Rapidsians.

Status: **Minimal Progress**

# Safe Alliances for Everyone Anti-Violence Strategy Report and Recommendations

Summary: In March of 2015, the Safe Alliances for Everyone (SAFE) Taskforce released a report regarding root causes to the issue of violence in neighborhoods and recommendations that derived from the research of the Taskforce. The Recommendations of the Taskforce were built around 5 Peace Pillars. They are:

- P-Prevention Investment
- E-Eliminate Violent Acts
- A-Activate Economic Opportunity
- C- Community Engagement, Education, and Empowerment
- E- Effect Positive Change in Public Institutions [Local, County, and State]

While geared toward reducing violence, this report provided recommendations that would be implemented at multiple levels of government. This comprehensive report will focus on the recommendations that fall within the general purview or are closely related to the work of the Grand Rapids Police Department.

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## Recommendation P-1

Establish dedicated staff, guided by a local leadership council, to spearhead this work and build partnerships for collective, systemic implementation. Implement the crime reduction strategy of South Bend or NOLA for life. Place all recommendations in the form of a strategy document. Appoint or hire someone with direct access to Mayor and City Manager to oversee violence prevention activities in the community. This person would coordinate activities city or county-wide as well as convene regular meetings with representative from law enforcement, mental health, probation, social services and others to coordinate activities and address specific issues and individuals in a proactive manner.

Findings: The Grand Rapids Police Department and the newly established Office of Oversight and Public Accountability have recently committed to working to implement violence reduction programming in Grand Rapids. The City of Grand Rapids has recently announced commitments to expand mental health partnerships to improve public safety outcomes.

Status: **Minimal Progress**

## Recommendation P-2

Educate the public by offering a public training center with experts teaching citizens practical living tools (Know Your Rights, illegal behavior, GRPD systems (technologies, filing citizen complaints), small business development (SBTDC, banking system), silent observer (address reporting concerns).

Findings: Although a public training center was not created, the Office of Oversight and Public Accountability (OPA) has recently been charged with providing programming related to Know Your Rights, illegal behavior, and filing citizen complaints. Prior to the creation of OPA, the City provided some education related to Know Your Right and filing citizen complaints. The work of OPA will improve the City's efforts in this area.

Status: **Minimal Progress**

## Recommendation E1-1

Support the Restorative Justice/reinstatement training approaches to discipline and provide for interventions when children have been exposed to violence and trauma.

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Findings: Both the Grand Rapids City Attorney's Office and the Kent County Prosecutor's Office offer restorative justice programming (on a case by case basis) as alternatives to traditional prosecution. In addition to the efforts employed by these departments, in its strategic plan, the Office of Oversight and Public Accountability has committed to implementing extensive restorative justice programming.

Status: **Some Progress**

### Recommendation E1-2

#### **Deploy Body Cams**

Findings: In March of 2015, The Grand Rapids Police Department unanimously voted to approved the City issued an Administrative Order requiring phased introduction of body cameras in the Grand Rapids Police Department. Since that time, the Grand Rapids Police Department has fully implemented its body camera program.

Status: **Completed**

### Recommendation E1-3

**Deploy shot spotter and other practical modern technologies in a way that reasonably protects privacy, builds community-police trust, informs investigations.**

Findings: The Grand Rapids Police Department has and continues to consider the implementation of shot spotter and other practical modern technologies to be used to implement this recommendation.

Status: **Minimal Progress**

### Recommendation E1-4

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Use elements of cease fire strategy to put the community on notice that crime is no longer acceptable. Include members of the community to stand with leaders. Convey this message as often as needed.

Findings: In recent times, the Grand Rapids Police Department has provided messages to community indicating that crime is no longer acceptable. These messages were conveyed in partnership with leaders.

Status: **Significant Progress**

### Recommendation E-5

Develop a hybrid violence reduction strategy for serious offenders from the following models: South Bend, Safe Communities, Cure Violence, Cease Fire, and Street Soldiers and identify/implement aspects for the city within a framework that gun violence is a public health issue.

Findings: This recommendation has not been implemented. The Grand Rapids Police Department and the newly established Office of Oversight and Public Accountability have recently committed to working to implement violence reduction programming in Grand Rapids.

Status: **Minimal Progress**

### Recommendation A1

Identify, train, and place 15-24 year olds in year round city-related employment opportunities.

Findings: In the Spring of 2020, The City of Grand Rapids announced the Grow 1000 youth employment program to provide employment opportunities to Grand Rapids youth. To date, 320+ youth completed pre-employment training and 220+ youth have been placed in employment opportunities.

Status: **Completed**

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## Recommendation A-2

**Support employment/workforce strategies for “At Risk” individuals.**

Findings: In the Spring of 2020, The City of Grand Rapids announced the Grow 1000 youth employment program to provide employment opportunities to Grand Rapids youth. To date, 320+ youth completed pre-employment training and 220+ youth have been placed in employment opportunities. Whereas targeting youth is a great start at supporting employment strategies for “at risk” individuals, additional strategies should be employed to positively impact other “at risk” individuals.

Status: **Significant Progress**

## Recommendation C-4

**Launch a city-wide SAFE GR media campaign to inform the community about the SAFE strategies that are being launched.**

Findings: Although some grantees have promoted SAFE GR, this recommendation was not comprehensively implemented.

Status: **Nominal/No Progress**

## Recommendation C-6

**Racial equity and implicit bias training for all judicial workers, public service, non-profits that serve minorities.**

Findings: Since 2016, GRPD has had all personnel trained in Implicit Bias. Some training has been presented by outside experts, and other training has been provided by GRPD personnel trained by Lamberth Consulting as Implicit Bias instructors and/or by Fair & Impartial Policing to spearhead the department’s program and efforts. Officers receive a minimum of 3 hours of training on this topic annually. The amount of training given related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their bias in order to serve impartially. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have

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been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics. Additionally, OEE has worked to provide equity training to Grand Rapids staff and has released a Request for Proposals to further that work.

Status: Although implicit bias training is now mandatory in GRPD, **Minimal Progress** has been made in ensuring that adequate training is given on these topics. The Office of Equity and Engagement has made **Significant Progress** toward instituting equity training throughout the City. Additional work is underway.

### Recommendation C-8

**Recommend racial equity and implicit bias training for all judicial workers, public service, non-profits that serve minorities.**

Findings: Since 2016, GRPD has had all personnel trained in Implicit Bias. Some training has been presented by outside experts, and other training has been provided by GRPD personnel trained by Lamberth Consulting as Implicit Bias instructors and/or by Fair & Impartial Policing to spearhead the department's program and efforts. Officers receive a minimum of 3 hours of training on this topic annually. The amount of training given related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their bias in order to serve impartially. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics. Additionally, OEE has worked to provide equity training to Grand Rapids staff and has released a Request for Proposals to further that work.

Status: Although implicit bias training is now mandatory in GRPD, **Minimal Progress** has been made in ensuring that adequate training is given on these topics. The Office of Equity and Engagement has made **Significant Progress** toward instituting equity training throughout the City. Additional work is underway.

### Recommendation C-9

**Review the State's "Stand Your Ground" law to understand the law and educate the community of the findings.**

Findings: This recommendation has not been implemented. The Office of Oversight and Public Accountability (OPA) is now charged with designing and implementing a "Know Your Rights and

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Responsibilities” community education campaign that focuses on increasing community understanding of misunderstood ordinances, laws, and responsibilities. This has been incorporated into OPA’s Strategic Plan.

Status: **Nominal/No Progress**

### Recommendation E2-1

The Police Chief shall review disparities with the arrest rates of African Americans in the city to ensure that equal protection of the law is afforded to all.

Findings: To date, arrest disparities have not been studied by the GRPD. The Office of Oversight and Public Accountability has recently been charged with reviewing disparities in arrests and will conduct this analysis going forward.

Status: **Nominal/No Progress**

### Recommendation E2-2

Review all GRPD policies and practices as it relates to “No Trespassing” letters/notices and “Pictures & Prints,” along with data for these arrests. Include findings in educational plans for the broader community.

Findings: After the release of the SAFE Report, GRPD has reviewed and updated policies and practices related to No Trespassing and Pictures and Prints. In 2016, the Field Interrogations policy, in the GRPD Manual of Procedure was updated in reference to pictures and prints. Specifically, guidance related to consent was added to the Manual of Procedures. GRPD indicates that there are no arrests typically associated with Pictures and Prints. Officers also received the updated information in training bulletins.

GRPD further advised that no trespass letters have also changed since the SAFE report was released. The department treats situations of people alleged to be trespassing in open businesses as an “unwanted persons call”. Individuals must be warned that they are trespassing. Those individuals must be asked to leave and they are then given an opportunity to comply. Officers must document the warning. If enforcement actions are taken (e.g. an appearance ticket or arrest), the incident report must include information about the prior warning. These incidents are documented as trespassing but there is not a specific code to specifically track no trespass letter arrests as they fall under the trespassing ordinance. Community groups were engaged to assist with educating businesses and brochures were also prepared and disseminated.

Status: **Significant Progress**

# SAFE REPORT

## Recommendation E2-5

**Allow 3 citizens to be part of the Commission's Public Safety Committee.**

Findings: This recommendation has been implemented.

Status: **Completed**

## Recommendation E2-6

**Enhance training for all city leadership and all police/fire staff (implicit bias, racial equity, police legitimacy, social systems, mental health first aid) which will foster relationship building, respect and understand of cultural difference.**

Findings: Since 2016, GRPD has had all personnel trained in Implicit Bias. Some training has been presented by outside experts, and other training has been provided by GRPD personnel trained by Lamberth Consulting as Implicit Bias instructors and/or by Fair & Impartial Policing to spearhead the department's program and efforts. Officers receive a minimum of 3 hours of training on this topic annually. The amount of training given related to these topics is not significant. The nature of the work performed by GRPD requires extensive training in the area of cultural competency and implicit bias. Officers must confront their bias in order to serve impartially. Recently, the Office of Oversight and Public Accountability (OPA) and the Office of Equity and Engagement (OEE) have been tasked with assisting GRPD in developing/instituting trainings related to implicit bias and other relevant cultural competency topics. Additionally, OEE offers multiple training opportunities to City staff including, but not limited to, equity training, cultural competency training and the Racial Equity Cohort. OEE recently released a Request for Proposals to further that work.

Status: Although implicit bias training is now mandatory in GRPD, **Minimal Progress** has been made in ensuring that adequate training is given on these topics. The Office of Equity and Engagement has made **Significant Progress** toward instituting equity training throughout the City. Additional work is underway.

## Recommendation E2-7

## SAFE REPORT

Conduct an independent audit of police protocols to understand where we can establish community court system for ticket payment to decriminalize certain crimes.

Findings: This recommendation has not been implemented.

Status: **Nominal/No Progress**

### Recommendations E2-8

Make Law Enforcement data transparent (disaggregate by race, age, gender to discern trends, support policing, equity, transparency, and trust, and measure progress).

Findings: The City has highlighted the need for disaggregation of data in its Strategic Plan. The City's new Police Dashboard, T.R.U.E. Action webpage, and Police Budget breakdown have helped to make law enforcement data more transparent. Additional work needs to be done to ensure that this data is disaggregated by race, age, and gender.

Status: **Some Progress**

### Recommendation E2-9

Incentivize GRPD, GR City employees to live in the city.

Findings: The City of Grand Rapids offers a down payment assistance program to City employees to incentivize City employees to reside in Grand Rapids. Additional incentives should be explored.

Status: **Some Progress**

### Recommendation E2-10

Support sensible state efforts to reform policing, parole, and probation policies that keep people locked up way beyond any rational concern for public safety. Establish a city-wide goal of lowering incarceration and recidivism rates. Determine if rules are harming or helping with employment and school.

Findings: A city-wide goal of lowering incarceration and recidivism rates has not been established; however the City is currently considering ways to reimagine policing in Grand Rapids. Based on information and belief, the GRPD Strategic Plan will address these issues in greater detail. Additionally, parole and probation are entities that are managed at the County and State levels.

# SAFE REPORT

Status: **Some Progress**

## Recommendation E2-13

**Promote relationships between police and probation officers.**

Findings: The department has continued to promote relationships with not only probation but parole officers through the years. A Kent County Prosecutor has been embedded into the Grand Rapids Police Department. This partnership has assisted in building connections between GRPD officers and probation and parole officers. GRPD's Child Protective Services Officers meet on a quarterly basis with juvenile probation officers. Probation and Parole officers also assist with GRPD's Prisoner Re-Entry program and the Cops for Kids program.

Status: **Completed**

# Table of Abbreviations

**21CP Report:** Grand Rapids Police Department Task Force on Police Policies and Procedures Report [2017]

**CAB:** Civilian Appeal Board

**CALEA:** Commission on Accreditation of Law Enforcement Agencies

**City:** City of Grand Rapids

**CRC:** Community Relations Commission

**Deployment Study:** Hillard-Heintze Staffing and Deployment Study [2019]

**GRFD:** Grand Rapids Fire Department

**GRPD:** Grand Rapids Police Department

**OEE:** City of Grand Rapids Office of Equity and Engagement

**OPA:** City of Grand Rapids Office of Oversight and Public Accountability

**SAFE Report:** Safe Alliances for Everyone Anti-Violence Strategy Report and Recommendations [2015]

**Traffic Stop Study:** Lamberth Traffic Stop Study [2017]