

# Grand Rapids Police Department



## Response to 21<sup>st</sup> Century Policing's Recommendations to the Policy & Procedure Review Task Force

In early 2017 the City of Grand Rapids contracted with 21CP to facilitate a Policy and Procedure Review Task Force that was made up of all ranks of the Grand Rapids Police Department and members of the community, who were appointed by the Mayor and City Commission. The Task Force was charged with reviewing the policies and procedures of the Grand Rapids Police Department for practices that could lead to disparate outcomes in the issuing of traffic citations and searches.

The Task Force has been meeting once a month for the past year, with every third meeting open to the general public. The conversation was constructive and impassioned on both sides, with multiple ideas and changes coming to fruition. Now that the Task Force has completed its directive, 21CP has compiled a final report on its recommendations. This report is a response to those suggestions, outlining things that the department is currently performing and addressing those items that would require additional resources.

The Grand Rapids Police Department remains dedicated to the most progressive, professional, and responsive service it can bring to the citizens of Grand Rapids. From programs like this Task Force to *Policing at the Speed of Trust*, the men and women of the GRPD have undertaken unprecedented efforts to improve relationships with the community they serve.

## 1. Staffing and Deployment

**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.

**Agreed:** *The Grand Rapids Police Department has been requesting additional staffing for a number of years. In an effort to increase police & community relations, the department has invested heavily in ways to increase non-enforcement contacts with members of the public. The department has created a Community Engagement Unit and the position of Community Policing Specialist. However, current staffing levels make it difficult for personnel assigned to those positions to not get pulled into more traditional enforcement activities.*

*The City of Grand Rapids has moved forward with the request for a study, and bids were accepted from experienced companies. A vendor was selected utilizing the city's process. An agenda item seeking commission approval will be presented to Committee of the Whole on November 27<sup>th</sup>.*

*The study will provide a comprehensive analysis of the department's personnel needs, sworn and civilian, and will look at additional factors, such as crime rates and geography.*

**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.

**Agreed:** *The Grand Rapids Police Department has extensive policies regarding topics outlined in this recommendation. These include the Field Interrogation policy, Manual of Conduct, and Unbiased Policing policy. In addition, the GRPD utilizes its Record Management System (RMS) to direct officers to areas requiring additional or specialized enforcement. These Service Area Referrals are input by the Service Area Captain and include enforcement expectations, directions, and limitations. Based on the recommendation from 21CP, the Captains will be directed to provide the clear guidance suggested.*

**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.

**Agreed:** *The Grand Rapids Police Department recognizes the need for communication and transparency within the neighborhoods. Whenever possible, a public meeting will be held to discuss sustained enforcement activities.*

*The department has expanded the use of Public Information Officers (PIO), social media, and mainstream press releases by coordinating closely with the city's communication office.*

*In addition, the department is researching methods where the Service Area Captain and PIO could address neighborhood questions and concerns, where increased enforcement efforts would be taking place. These can be achieved using the already well established relationships with the Neighborhood Associations.*

**Recommendation 1.4:** 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.

**Agreed:** *The GRPD meets weekly to hold IOS – Intelligence Operation Summary meetings. These meetings are a monthly review crime strategies and resource deployment for the five Service Area. Reviews include, but are not limited to, stop, search and arrest data. The results of the enforcement efforts will be evaluated through a lens of racial equity.*

**Recommendation 1.5:** As recommended in the Lamberth report, GRPD should immediately conduct an analysis of its 2016 stop data.

**Agreed in part:** *The Grand Rapids Police Department is committed to continually analyzing available data for the purpose of identifying disparate outcomes and providing professional service. With many of the recommendations, however, personnel becomes an issue. The current staffing level of the department does not allow for the temporary reassignment of personnel to long-term projects.*

*The 2016 Lamberth study also brought into question the best practices for collecting stop data and traveling population demographics. The GRPD supports the competitive bid process adopted by the City of Grand Rapids to ensure the most professional and capable consultants are identified to provide these valuable services.*

*City Commission and community input recognized that an immediate review of stop data regarding past years was of limited value. It was decided collaboratively that a bias free policing policy would be put into effect and training undertaken prior to embarking on another traffic study.*

**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.

**Agreed in part:** *Michigan Drivers Licenses do not contain racial demographic information. It has been recognized that officer identification is imperfect, while asking drivers how they self-identify would be intrusive and inappropriate.*

*This information is contained in the required incident reports that are completed after a traffic stop that would result in any of the above described actions. The department can investigate ways to streamline the recording of this information into the officer's log automatically and calculate the statistics for review.*

**Recommendations 1.7:** GRPD should conduct regular analyses of its stop data – both at the aggregate and individual officers level to ensure deployment patterns and crime strategies are not resulting in racially disparate effects.

**Agreed in part:** *As part of the CALEA accreditation, the GRPD is required to conduct annual reviews of traffic stop data, racial profiling complaints, and*

*analysis of the Early Warning System. These analyses would be able to highlight any disparate effects of officer activities.*

*Conducting individual officer level review, without the context of a traffic study, provides no relevance to the data.*

**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.

**Agreed:** *The GRPD will be looking for an academic institute that that can assist with this undertaking. As this may involve an expenditure of city dollars, an RFP to include the scope of services, will have to be prepared. City Commission approval will be needed before entering into any contract.*

**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.

**Agreed:** *Chief Rahinsky and department leaders are currently participating in a variety of open data initiatives and will also consider the projects by the Police Foundation.*

## **2. Internal Affairs (IAU)**

**Recommendation 2.1:** GRPD should add clear prohibitions against conflicts of interests to existing policies.

**Agreed:** *Conflict of interest language was added to the GRPD’s Internal Affairs Policy that expressly prohibits IAU personnel from investigating subjects or complaints where they have a, or may have a perceived, conflict of interest.*

**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.

*Note:* The current policy refers community members to the Internal Affairs Unit, which is only open during normal business hours. This may cause the department to lose an opportunity to learn about potentially inappropriate behavior or deficient performance. It may also interfere with a supervisor's ability to resolve the incident as appropriate and/ or impact the ability of the department to gather relevant information that may prove useful toward exonerating or sustaining a complaint.

**Agreed:** *The GRPD's Internal Affairs Policy was modified to reflect this recommendation. Internal Affairs complaints may now be taken by on-duty supervisors and forwarded to the IAU for investigation. Patrol supervisors have been trained on how to respond to complaints, with the ability to attempt resolution, without dissuading a community member from following through with a complaint.*

**Recommendation 2.3:** Complaint 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.

**Agreed:** *See response above to recommendation 2.2.*

**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.

**Agreed:** *The IAU community pamphlet has been updated to reflect the changes made above and is available in hard copy, in both English and Spanish, around the city and on various websites and links.*

**Recommendation 2.5:** GRPD should conduct an analysis of community complaints for the past 5 years to identify any patterns and trends.

**Agreed:** *As part of the CALEA process, the GRPD is required to conduct an in-depth analysis of Internal Affairs complaints on an annual basis. The purpose is to identify any trends or issues, as well as prescribe to best practices and adherence to policy.*

*The GRPD utilizes one of the professions finest early intervention software programs, I.A. Pro. I.A. Pro provides a broad range of proactive early intervention support features. Included are nine different configurable thresholds, peer group analysis, and a variety of ranking and comparison reports.*

**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.

**Agreed:** *The GRPD will included the above described information in the annual report and make it available to city leaders, stakeholders, and to the community through the department's website.*

**Recommendation 2.7:** GRPD should expand its Early Intervention System (EIS) to include stop and search data.

**Agreed:** *The GRPD utilizes one of the professions finest early intervention software programs, I.A. Pro. I.A. Pro provides a broad range of proactive early intervention support features. Included are nine different configurable thresholds, peer group analysis, and a variety of ranking and comparison reports. Stop and Search Complaints will be incorporated into these thresholds.*

### **3. Training**

**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.

**Agreed:** *The GRPD's Training Unit compiles a comprehensive training calendar every year. Training needs are identified through a number of sources: required re-certifications, needs of the agency, local and national trends, best practices, CALEA requirements, annual analyses, and MCOLES mandates.*

*In addition, public input will be sought and incorporated into the annual needs assessment to identify community priorities. Community priorities will be aligned*

*with departmental goals and objectives. Input will be solicited from the Public safety Committee, Impact, ALPACT, CRC and CAB.*

**Recommendation 3.2:** GRPD should include community members and relevant stakeholder groups in the development and presentation of officer training.

**Agreed:** *The GRPD has included community members in many of its recent training opportunities. Bias Free Policing, by Dr. Lori Fridell, was a joint police and community undertaking which resulted in the departments Bias Free Policing Policy. Policing at the Speed of Trust, which is currently ongoing, pairs officers and community stakeholders in a one on one dynamic learning atmosphere.*

*Public input will be sought and incorporated into the annual needs assessment to identify community priorities/ Community priorities will be aligned with departmental goals and objectives*

**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.

**Agreed:** *The GRPD has taken aggressive steps to address training in the area of cultural competency and unbiased policing. The department has trained approximately a dozen personnel as unbiased policing instructors and the entire agency has attended the training.*

*New recruits receive training in unbiased policing, using the traffic stop study as the historical and local context. The agency has also partnered with Franklin Covey to train the entire agency, along with an equal number of community members, in Policing at the Speed of Trust.*

*Department personnel continue to participate in the city’s Racial Equity in Action Leadership (REAL) cohorts. Opportunities for additional cultural competency training, to include a focus on historically disenfranchised communities, will be sought.*

#### 4. Youth Policy

The recommendations below have been provided to the Task Force and GRPD for their consideration. The GRPD Youth policy has been completed by GRPD and adopted by the City Commission.

**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.

**Agreed:** (A) is addressed through training on the new policy and integrated skills training.

(B) and (C) are essentially the same and are already addressed in the policy.

(D) is addressed in the Unbiased Policing policy and would be redundant here.

**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.

**Agreed:** The Youth Policy is currently being modified to incorporate this recommendation. Policy modifications will be addressed internally and shared with community stakeholders.

**Recommendation 4.3:** The policy should require supervisors respond to the scene whenever a minor 12 or under is handcuffed.

*See above*

**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.

**Agreed:** *This recommendation is already included in an existing policy. GRPD policy 8-1 Field Interrogations E. 6. f. (7) states that any juvenile who is searched or frisked must have his/her parent or guardian contacted after the completion of the stop.*

**Recommendation 4.5:** Policy should require officers receive cohesive training that enables officers to understand adolescent development; cultural differences among youth; mental health and trauma issues; and effective strategies for youth engagement, intervention and crisis response.

**Agreed:** *GRPD personnel receive extensive training regarding cultural differences, mental health, and trauma. This training occurs both in-house prior to deployment and in-service throughout the officers' careers.*

*The GRPD has also recently developed integrated skills training regarding juvenile contacts, use of force, and decision making. This training includes the use of youth specific video scenarios for application in the department's MILO system.*

*Finally, patrol personnel are cycled through temporary assignments to the Boys and Girls Clubs Youth Centers of Grand Rapids, in order to have a more direct contact with our youth and to better understand youth related issues.*

**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).

**Agreed:** *As part of the continuing effort to improve relations with Grand Rapids' youth, and in compliance with CALEA accreditation, the GRPD instituted the Youth Interaction policy, which specifically requires personnel to use the "most reasonable, and least restrictive, alternative consistent with public safety, officer*

*safety, maintenance of public order, department policy and the rights of the youth.”*

**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.”

- (A) 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.
- (B) 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.
- (C) Having CPS on the ground when children are involved in an arrest environment is a proactive intervention.

*Agree in part: The policy language cannot be made any “stronger” because it relies on the availability of resources that are outside the control of the GRPD.*

*The suggestions made in this recommendation are more in line with a program, and would require coordination and understanding with additional agencies.*

*While they no doubt yield positive results, it is a substantial undertaking compared to the already inadequate available resources that the GRPD has available for such programming.*

*The department already engages in a number of efforts to forge positive relationships with Grand Rapids youth, particularly those in at-risk settings. Despite the shortage of personnel, the department continues to fully staff the Boys and Girls Clubs, as well as running programs such as On Base and the Youth Police Academy.*

## **5. Community Policing and Crime Reduction**

**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.

**Agreed in part:** *The GRPD works collaboratively with elected officials and community leaders. The GRPD utilizes community policing as both an organizational model and a policing philosophy. It will be left to the discretion of the City Manager and Commissioners regarding any potential resolution committing to a police department operational philosophy.*

**Recommendation 5.2:** GRPD should develop a citywide community policing plan that incorporates crime reduction strategies, community engagement and partnerships, and police department oversight.

**Agreed:** *The Grand Rapids Police Department has been committed to the concept of community policing since 1998. In that year, the GRPD created the Service Area model for the city, with each Service Area being commanded by a Captain.*

*At the same time the department created the position of Community Policing Officer, in order to address the neighborhood specific concerns in their assigned area. Chief Rahinsky has continued this dedication, renaming the CPOs to Community Policing Specialists. This is because, in his vision, every officer of the GRPD is a community policing officer.*

*Chief Rahinsky has developed a Compstat type program referred to as IOS, Intelligence Operational Summary. Much like CompStat, Service Area Commanders and Unit heads are required to report out on community policing efforts, crime reduction strategies, community engagement events, and partnerships with stakeholders, and they are held accountable for complaints, crime trends, and the results of these efforts.*

*Personnel at all levels are trained on available resources for proactive problem solving and partnerships with groups such as Neighborhood Associations. The department continues to take a team approach to problem solving within the community.*

**Recommendation 5.3:** GRPD should include community members in its CompStat process.

*Agreed: As the process continues to evolve, community stakeholders will be invited to attend sessions.*

**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).

**Agreed in part:** *The department leadership recognizes this recommendation as a priority and a highly desirable approach, and embraces this model whenever possible. At its current staffing level the department cannot fully embrace community engagement to the extent that both the department, and the community desire. Upon completion of the Staffing and Deployment study, if additional personnel are provided, additional emphasis will be placed on non-enforcement community engagement activities.*

**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.

**Agreed:** *This type of training is provided to Community Policing Specialists, who are assigned to work a specific area or neighborhood. One of their primary functions is to participate in POP, along with stakeholders in their area. Providing the training department-wide would be desirable and beneficial, but difficult with the current staffing level and amount of training already required.*

**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.

*Agreed: These traits are evaluated in the Interpersonal Skills and Oral Communication anchor in the department's current Evaluation System. This anchor is required for all sworn personnel.*

**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.

*Agreed in part: The department leadership recognizes this recommendation as a priority and a highly desirable approach, however the primary objective of law enforcement must always be responding to calls for service by the public.*

*At its current staffing level the department cannot utilize any strategy that increases non-enforcement activities without sacrificing response time and level of service.*

*Upon completion of the Staffing and Deployment study, it will be a priority for each GRPD beat officer, contingent upon staffing, to complete a quarterly problem oriented policing project.*

**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.

*Agreed: The department's Board of Awards, and Chief of Police, are able to recognize officers and these types of efforts through the presentation of commendations and medals. The current award categories contain commendations that recognize personnel for problem-solving oriented policing strategies.*

## **6. Recruiting and Hiring**

**Recommendation 6.1:** The City and GRPD continue its recruitment outreach efforts with a specific focus on minority recruitment and retention.

*Agreed: The GRPD is dedicated to finding the most qualified personnel, who reflect the community, to serve the public professionally, progressively, and responsively. These efforts continue with the return of non-certified, sponsored, academy recruits. The year 2019 will see the third such class of recruits, which have proven to be the most diverse in recent years.*

**Recommendation 6.2:** The City and GRPD continue the “Intern” program and provide sufficient resources to increase participation.

**Agreed:** *The Intern program continues to be one of the most effective ways for Grand Rapids and the department to recruit and train the most dedicated and diverse individuals. While it would be highly beneficial to increase the number of Intern participants, it would put an unbearable hardship on the sworn personnel, who are involved in their hiring process, without increasing that staffing as well. Interns must be recruited, hired, trained, and supervised by sworn personnel.*

**Recommendation 6.3:** The City continues to use community members as part of the interview process of applicants.

**Agreed:** *The GRPD, Human Resources, and Labor Relations will continue to utilize community stakeholders in the hiring process in order to receive input and provide transparency for recruiting and hiring efforts.*

**Recommendation 6.4:** The City consider engaging in a national recruitment effort to increase the diversity pool and outreach efforts.

**Agreed:** *The department continually engages in recruitment and hiring efforts outside the state of Michigan, but these efforts are limited due to cost and resources. Despite the amount of hiring being conducted by the department, personnel must fill vital positions before being able to participate in out-of-state recruiting opportunities.*

## Summary

The Grand Rapids Police Department appreciates the efforts of the 21CP Task Force, particularly those community members who volunteered their time for this endeavor. The recommendations from 21CP and the Task Force will be a benchmark for the department's continual improvement efforts.

Thirty eight total recommendations have been made. Many of those recommendations were addressed during the time of the Task Force, and many more have been addressed through recent efforts. Out of the 38 recommendations, 7 of them involve some type of training for department personnel, and 5 would require the addition of sworn personnel.

While the Grand Rapids Police Department recognizes the need to address the concerns of all members of the community, some of these efforts will require additional sworn staff.

The primary responsibility of any police agency has always been to respond to calls for service from the public. Current staffing levels require personnel who are otherwise assigned proactive, community based, non-enforcement activities to forsake those efforts in order to provide police services and vital assistance to fellow officers.

The department, from the line officer to its leadership, is dedicated to continual improvement in all areas of service. The Grand Rapids Police Department remains committed to providing progressive, professional and responsive police services to this great community.

Chief David Rahinsky