



CITY OF
GRAND
RAPIDS

Office of
Oversight and
Public Accountability



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Canine Program Benchmarking Study

A Policy-Level Benchmarking Review of the Grand Rapids Police Department's Written Canine Policy and Reported Operational Practices, Compared to Selected Peer Agencies and Nationally Recognized Best Practices.

**Prepared by the City of Grand Rapids Office of
Oversight and Public Accountability (OPA)**

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1. Executive Summary

In response to the City Commission's request, the City Manager directed the Office of Oversight and Public Accountability (OPA) to undertake a benchmarking analysis of peer jurisdictions and nationally recognized professional associations related to the Grand Rapids Police Department's (GRPD) canine policy, MOP 6-8.1.

The review identifies areas where written policy could be clarified or strengthened to better align with peer-city practices and nationally recognized sources, particularly in how canine operations integrate with the department's broader force-governance, accountability, and community-protection frameworks. GRPD's canine policy contains important existing provisions that reflect current professional expectations. MOP 6-8.1 includes national certification requirements through IPWDA, NAPWDA, or USPCA and currently includes recall and control provisions that apply once a suspect is in custody or no longer presents a reasonable threat.

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After completing the MOP 6-8.1 policy-level review, OPA met with GRPD and learned that several operational practices currently followed by the canine unit are not fully reflected in written policy. In practice, GRPD restricts canine apprehension in “non-serious” offenses where no danger is present.

OPA recommends, among other things, that canine apprehension be defined within the Department's existing use-of-force governance framework (MOP 9-1) and establish a defined canine-specific apprehension threshold consistent with benchmarked peer agencies and nationally recognized sources. This would better align the written canine policy with reported operational practice and with nationally recognized sources.

Defining an apprehension threshold, for canine apprehension, in writing would align the policy with peer-city practice. MOP 6-8.1 currently directs handlers to weigh offense severity, threat, and resistance before a physical apprehension and does not limit canine apprehension to serious violent felonies, armed suspects, or other defined high-risk situations. Vulnerable population protections established in GRPD policy (MOP 8-16, 8-10, 10-2, 10-3) should be explicitly extended to canine encounters. Supervisory approval before bite-risk deployments and comprehensive public reporting of canine deployments and outcomes are also recommended to align with nationally recognized best practices.

These observations are offered not as findings of misconduct or legal conclusions but to support the practical goal of keeping written policy, training, and stated practice aligned and auditable. Because the underlying canine deployment data, bite statistics, and completed Internal Reviews have not been provided to OPA, those reported practices are described in this report as GRPD has stated them rather than as independently verified findings.

Introduction

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On March 17, 2026, City Manager, Dr. Mark Washington, issued a follow-up report to the City Commission (See Appendix C). In Section 2 of that report, the City Manager directed OPA to lead a best practice benchmarking analysis of peer jurisdictions and national professional associations related to police canine pursuit and use policies with input from the Police Department to identify model agencies and relevant comparison points as part of the City's continuous improvement efforts in public safety.

Use of canine units in Public Safety Departments is common practice across the United States and benchmarking GRPD's policy against comparable agencies and recognized national sources offers a structured way to identify where the Department's written policy aligns with, or diverges from, current professional expectations.

A canine program operates within the broader policy environment of the department that houses it. For that reason, this review examines not only GRPD's Canine Program policy (MOP 6-8.1) but also how that policy interacts with six related GRPD policies governing force, pursuit, and the protection of vulnerable persons: the Use of Force policy (MOP 9-1.1), the Emergency Vehicle Operations / Pursuit policy (MOP 8-6.1), the Youth Interactions policy (MOP 8-16), the Deaf and Hard of Hearing policy (MOP 8-10), the Custody of Incapacitated Persons policy (MOP 10-2), and the Responding to Persons with Mental Disorders policy (MOP 10-3.1).

In the spirit of collaboration, OPA met with GRPD and learned that, while not always reflected in written policy, GRPD reports that the canine unit operationalizes several elements that this study has identified as nationally recognized policy expectations. Those reported practices are described in Section 4.10. The recommendations in this report are intended, in part, to bring written policy into alignment with practices GRPD reports it already follows, and to clarify the relationship between the written policy and reported practice so that the two are consistent.

This analysis is based on GRPD's written canine policy as published in MOP 6-8.1 and the GRPD K-9 Handler Manual. It does not evaluate individual incident decisions or handler conduct. Data and policy material from GRPD are acknowledged and form a meaningful foundation for the recommendations within this report.

SUMMARY OF RECOMMENDATIONS

- Formally classify canine apprehension within the use of force framework. Integrate canine apprehension into MOP 9-1.1 so that the Department's existing de-escalation, duty-to-intervene, and reporting requirements apply to K-9 deployments. This would also include canine deployment data into the annual use-of-force statistical analysis already required under MOP 9-1.1, Section K.2.b.
- Narrow the canine-specific apprehension threshold language. Build on the constitutional reasonableness factors GRPD reports it already applies by adding a defined canine-specific apprehension threshold language limiting physical apprehension to violent felonies consistent with peer-agency practice and with IACP, PERF, and the Washington State CJTC. This also includes extending the vulnerable-population protections established in MOP 8-16 (Youth), MOP 10-3.1 (Mental Health), MOP 8-10 (Deaf and Hard of Hearing), and MOP 10-2 (Custody of Incapacitated Persons) to canine encounters, creating presumptive restrictions for known or suspected juveniles, elderly persons, individuals in crisis, and individuals with impairments.
- Expand public reporting of canine deployment and outcome. GRPD's public dashboard already reports aggregate annual canine force counts. Clarify and expand the existing report to include deployment totals,

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bite occurrences, bite-to-deployment ratios, offense categories, injury severity, affected-individual demographics, and warning compliance.

- *Standardize warning language and warning documentation.* Include standardized warning language in written policy, provide multilingual considerations, and require written documentation whenever a warning is not given.
- *Require supervisory approval before bite-risk deployments.* At minimum, articulate when a sergeant-level concurrence is expected before physical apprehension, area search apprehension, or off-lead deployment for consistency with peer-agency practices.

2. BACKGROUND AND METHODOLOGY

This report compares GRPD's canine policy to the policies of selected mid-size peer agencies and to nationally recognized sources published by the International Association of Chiefs of Police (IACP), the Police Executive Research Forum (PERF), the Washington State Criminal Justice Training Commission (CJTC), the National Association for Civilian Oversight of Law Enforcement (NACOLE), and selected peer-reviewed academic research. The review describes how GRPD's canine program reflects, or could be clarified to more clearly reflect, the expectations found across those sources.

The study was designed to be a collaborative effort. GRPD was invited to nominate benchmark agencies and to provide input. Chief Trigg recommended five agencies (Kent County Sheriff's Department, Michigan State Police, Traverse City Police Department, Wyoming Police Department, and West Covina Police Department) and provided the K-9 Handler Manual. This cooperation is noted and appreciated. OPA selected additional peer cities to support a balanced and representative comparison.

The nine peer agencies represent a range of city sizes, geographic regions, and policing structures. Agencies were selected based on the following considerations: comparable population and policing context, geographic and demographic diversity, availability of publicly accessible canine policies, inclusion of agencies that have updated their canine policies in recent years, and representation of varying approaches to canine deployment governance.

Peer Agencies that could not be included: Chief Trigg nominated Wyoming Police Department and Michigan State Police. Despite diligent efforts, OPA was unable to obtain either agency's canine policy. Wyoming Police Department's policy was not publicly accessible, and Michigan State Police indicated that its policy is not available for public review. Because this study relies on documented policy language for consistent review, both agencies could not be included in the comparison.

OPA selected the following benchmark agencies: Madison, Wisconsin; Worcester, Massachusetts; Detroit, Michigan; Fort Collins, Colorado; Spokane, Washington; and Salt Lake City, Utah. Further rationale for OPA's selections can be found in Section 3.1.

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3. BENCHMARKING FRAMEWORK

3.1 THREE PART BENCHMARKING FRAMEWORK

Part	Description	Purpose
Part 1: GRPD Cross-Policy Analysis	Examines how MOP 6-8.1 interacts with six related GRPD policies: Use of Force (MOP 9-1.1), Vehicle Pursuit (MOP 8-6.1), Youth Interactions (MOP 8-16), Deaf and Hard of Hearing (MOP 8-10), Custody of Incapacitated Persons (MOP 10-2), and Mental Health Response (MOP 10-3.1).	Identifies opportunities for the canine policy to be more clearly connected to GRPD's existing protective and accountability frameworks.
Part 2: Best Practices from Nationally Recognized sources	Published guidance from the International Association of Chiefs of Police (IACP), the Police Executive Research Forum (PERF), the Washington State Criminal Justice Training Commission (CJTC) Model Canine Policy, the National Association for Civilian Oversight of Law Enforcement (NACOLE), and selected peer-reviewed academic research.	Identifies recurring policy recommendations and recognized accountability safeguards across the profession.
Part 3: Selected Peer City Comparison	Agencies of comparable population, demographics, and policing structure. GRPD nominated up to four agencies, and OPA independently selected the remainder.	Provides a direct comparison of GRPD's written canine policy to the policies of similarly situated agencies.

3.2 TEN BENCHMARKING FACTORS

There is no single, universally adopted standard governing police canine programs in the United States. Canine policy varies widely across jurisdictions, and no federal statute or national accreditation body prescribes a uniform set of requirements. However, a clear convergence of expectations has emerged across the leading professional associations, federal reform actions, state-level model policies, and peer-reviewed research.

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The ten benchmarking factors used in this study were not developed by OPA. They are drawn from the recurring policy features found across IACP guidance, PERF recommendations, the Washington State CJTC Model Canine Policy, NACOLE oversight guidance, peer-reviewed academic research, and the canine policies of the peer agencies reviewed. These factors are presented as nationally recognized policy considerations rather than as requirements that any individual agency is bound to meet.

These factors also reflect the operational categories around which law enforcement agencies routinely structure their canine policies. Among the nine peer agencies reviewed in this study, most agencies address the majority of these ten areas in some form and widely used policy platforms such as Lexipol incorporate provisions for force classification, deployment thresholds, warnings, supervisory involvement, and incident documentation as standard template elements. The degree to which any given agency addresses each factor varies, and that variation is the focus of this study.

Each agency was reviewed against the following ten Benchmarking Factors:

1. Force Classification. Does the policy classify canine bites or apprehension as a use-of-force option? Source basis: IACP Patrol Canines Model Policy, Sec. IV.B.5 ("The deployment of a police canine for apprehension of a suspect is a use of force"); PERF Guidance on Policies and Practices for Patrol Canines (2020), Recommendations 17 through 20; Washington State CJTC Model Canine Policy; selected peer-agency policies.
2. Apprehension Threshold. Is canine physical apprehension described as limited to serious violent felonies, armed suspects, or other high-risk situations? Source basis: IACP Patrol Canines Model Policy, Sec. IV.B.4 (deployment based on severity of crime, immediate threat, and active resistance); PERF Guidance, Chapter 3; Washington State CJTC Model Canine Policy; selected peer-agency policies.
3. Vulnerable Population Protections. Are there restrictions for juveniles, elderly persons, persons in mental health crisis, or impaired individuals? Sources: Washington State CJTC Model Canine Policy; NACOLE oversight standards; peer agency policies (including West Covina and Detroit).
4. Transparency and Reporting. Is public reporting of deployments, bites, demographics, or bite ratios required? Sources: PERF Recommendation 20 (canine usage data should be published annually); PERF Guiding Principles on Use of Force, Principle 11 (public reporting); NACOLE oversight guidance.
5. Warning Requirements. What warnings must be given, and is documentation required when warnings are waived? Sources: PERF Guidance, Chapter 3; IACP Concepts and Issues Paper; Washington State CJTC Model Canine Policy.
6. Supervisor Approval. Does the policy require supervisory approval before bite-risk deployments? Sources: PERF Recommendation 18 (every canine contact or bite should be critically reviewed by a supervisor); IACP Model Policy (supervisory roles); Washington State CJTC Model Canine Policy.
7. Bite Incident Review. Who conducts the primary review, and is it independent of the canine unit? Sources: PERF Recommendations 18 and 19 (supervisory review of all contacts and bites; inclusion in general force review process); IACP Model Policy (structured reporting and review); Washington State CJTC Model Canine Policy.

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8. Training Methodology. Does the policy specify bite-and-hold, bark-and-hold, or another approach? Sources: IACP Concepts and Issues Paper, Sec. G (find-and-bark versus find-and-hold methods and their de-escalation implications); PERF Guidance, Chapter 2; Mesloh (2006) on canine methodology.
9. Demographic Tracking. Is demographic data collected and analyzed for canine deployments? Sources: NACOLE oversight standards; NIJ-funded research linking canine use to increased suspect injury risk and severity, reinforcing the need for data-driven program management. GRPD already collects demographic data for other use-of-force categories through its IAU annual statistical analysis (MOP 9-1.1, Sec. K.2.b).
10. Recall and control. Is the handler required to recall the canine once the suspect is in custody or the threat has ended? Sources: PERF Recommendation 15; IACP Model Policy, Sec. IV.B (handler control and disengagement expectations); Washington State CJTC Model Canine Policy.

3.3 REVIEW METHODOLOGY

OPA reviewed GRPD's written canine policy (MOP 6-8.1), the GRPD K-9 Handler Manual, related GRPD policies, selected peer-agency policies, and nationally recognized sources. Each topic is described by whether it is expressly addressed in MOP 6-8.1, addressed through a related GRPD policy, addressed through GRPD's reported operational practice, or recommended for enhancement or codification in written policy.

OPA also met with GRPD after the policy-level review and learned of several operational practices that the canine unit reports it follows but that are not fully reflected in MOP 6-8.1. Those reported practices are described in Section 4.10. They are presented as reported by GRPD because the underlying canine deployment data, bite statistics, and completed Internal Reviews have not been provided to OPA and the practices could not be independently verified.

Where written policy is ambiguous, OPA noted the ambiguity and applied a reasonable interpretation. The review remains a written-policy and reported-practice review. It is not legal analysis or an audit of individual incidents. Furthermore, this report does not imply that any GRPD officer has used canine force unreasonably, and it does not conclude that GRPD's written policy violates any court decision or federal standard.

3.4 DATA SOURCES AND LIMITATIONS

This study draws on the following categories of source material:

- Publicly available canine policies from each peer agency, obtained through agency websites, public records portals, or direct request.
- Nationally recognized sources, including the IACP Patrol Canines Model Policy and Concepts and Issues Paper (2015), PERF's Guidance on Policies and Practices for Patrol Canines (2020), PERF's Guiding Principles on Use of Force (2016), the Washington State CJTC Model Canine Policy (2021), and NACOLE oversight standards and guidance.
- GRPD internal policies, including MOP 6-8.1 (Canine Program), MOP 9-1.1 (De-escalation, Response to Resistance, and Use of Force), MOP 8-6.1 (Emergency Vehicle Operations and Pursuit), MOP 8-16 (Youth Interactions), MOP 8-10 (Deaf and Hard of Hearing), MOP 10-2 (Custody of Incapacitated Persons), and MOP 10-3.1 (Responding to Persons with Mental Disorders).
- The GRPD K-9 Handler Manual, provided to OPA by Chief Trigg.

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- Selected peer-reviewed and federally funded academic research, including Adams et al. (2023, Journal of Experimental Criminology) on Salt Lake City canine reform outcomes; an NIJ-funded multi-method evaluation linking canine use to increased suspect injury risk and severity; and Mesloh (2006) on canine methodology.

Limitations: This analysis is a policy-level benchmarking review based on written policies, published guidance, and operational practices that GRPD described to OPA. Consistent with the scope of this review, OPA did not examine internal GRPD deployment data, bite statistics, and completed Canine Program Internal Reviews. These materials would be central to a future operational or outcome-based review of how the canine policy is applied in practice. Language and policy varies across agencies in structure, specificity, and terminology. OPA applied the benchmarking factors as consistently as possible while acknowledging that interpretive judgment was sometimes necessary given the non-standardized nature of canine policy drafting.

4. GRPD CURRENT STATE: POLICY AND CROSS-POLICY ANALYSIS

This section reviews GRPD's Canine Program (MOP 6-8.1) and how it interacts with six related GRPD policies: Use of Force (MOP 9-1.1), Emergency Vehicle Operations and Pursuit (MOP 8-6.1), Youth Interactions (MOP 8-16), Deaf and Hard of Hearing (MOP 8-10), Custody of Incapacitated Persons (MOP 10-2), and Responding to Persons with Mental Disorders (MOP 10-3.1). GRPD has undertaken substantial work to develop protective policies for vulnerable populations and to establish comprehensive force-governance frameworks. Nationally recognized sources suggest that these protections benefit from being expressly extended to canine encounters. Because canine deployments may occur in situations where the subject's identity or characteristics are not known to the handler, cross-referencing those protections within the canine policy would help ensure that the relevant considerations are consistently applied.

4.1 POLICY OVERVIEW (MOP 6-8.1)

GRPD's Canine Program policy (MOP 6-8.1, seven pages, updated August 2024) establishes procedures and guidelines for the use and management of trained police canine teams. The policy is filed under Chapter 6 (Operational Procedures), not Chapter 9 (Use of Force and Weapons). This organizational placement frames the canine program as an operational tool rather than a force instrument, which could influence how officers and supervisors conceptualize canine deployment decisions.

4.2 AUTHORIZED FUNCTIONS

While this report concentrates on canine apprehension, GRPD authorizes canine use across a broad operational range:

- Suspect tracking and potential evidence collection during or after criminal offenses
- Missing person incident tracking where the missing person may be in danger
- Article/evidence searches for stolen or abandoned property
- Building searches where burglary or felony suspects are believed to be hiding
- Narcotic searches (homes, vehicles, open areas, parcels) when legal requirements are met
- Physical apprehensions based on totality of circumstances
- Area searches to locate and apprehend hidden felony suspects
- Off-lead apprehensions after verbal warnings and totality review
- Tactical/SRT deployments under SRT supervisor direction

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4.3 CANINE POLICY VS. USE OF FORCE (MOP 9-1.1)

Key Observation: Canine apprehension is not expressly described as a use-of-force option within MOP 9-1.1.

MOP 9-1.1 sets out a detailed force continuum that runs from Officer Presence and Verbal Direction through Compliance Controls, Physical Controls, Intermediate Control, and Deadly Force. It expressly addresses compliance control devices, conducted energy weapons (CEWs), aerosol subject restraints (ASRs), impact weapons, kicks, strikes, takedowns, neck restraints, motor vehicles as force, and tactical duty knives. Canine apprehensions and bites are not currently described within MOP 9-1.1.

MOP 9-1.1 reporting requirements (Section H) describe a Use of Force Report for compliance controls causing injury, lethal weapons use, pressure points, takedowns, kicks, strikes, impact weapons, ASRs, and CEWs. Canine apprehensions are not currently included in this list. MOP 6-8.1 separately addresses a Use of Force Report for bites (Section F.1). The relationship between these two reporting paths could be clarified in written policy.

Discussion: IAU conducts an annual statistical analysis of all Use of Force Reports under MOP 9-1.1 Section K.2.b. It is not clear from written policy whether canine apprehension incidents are included in that analysis or whether they are tracked separately under the canine program. GRPD reports operationally that canine bites are treated as a use-of-force event. Cross-referencing canine apprehension within MOP 9-1.1 would clarify how the existing de-escalation, duty-to-intervene, supervisory review, and reporting expectations apply to canine deployments. It would also extend the IAU annual statistical framework to canine deployments, building on the analytic process already in place for other force categories.

4.4 CANINE POLICY VS. VEHICLE PURSUIT POLICY (MOP 8-6.1)

Key Observation: MOP 8-6.1 directs the assignment of a K9 unit during pursuits but does not set separate criteria for canine deployment.

Current vehicle pursuit policy MOP 8-6.1 Section K.4 directs Emergency Communications Operators to "Contact and assign a K9 Unit if available" during pursuits. Within this policy, there is no further guidance on when K9 deployment is appropriate during pursuit, the "cooling-off period," or the distinction between a suspect who is actively dangerous versus one who is merely fleeing.

This lack of explicit guidance is significant because GRPD's pursuit restrictions MOP 8-6.1 Section G.1.b limit pursuit initiation to situations involving an "inherently violent fleeing felon" or a violent felony crime, unless officers can articulate a pursuit exceptional circumstance. Pursuits are prohibited for property crimes and misdemeanors (Section H.3) and when the suspect's identity is known (Section H.6). These are meaningful restrictions on when officers may pursue.

Discussion: GRPD's pursuit policy articulates when officers may chase a vehicle. Once that pursuit ends, the current canine policy does not include additional written assessment criteria before deploying a canine for physical apprehension. The pursuit policy also includes supervisory involvement, including patrol supervisors monitoring pursuit compliance (Section J.1), choosing when to terminate pursuits (J.2), and coordinating perimeter units (J.9). The annual review under Section P.4 requires the Training Unit and IAU to analyze all pursuit reports for trends. Comparable supervisory structure for canine deployment in this setting could be clarified in MOP 6-8.1.

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4.5 CANINE POLICY VS. YOUTH INTERACTIONS (MOP 8-16)

Key Observation: GRPD's youth interactions policy contains protections that are not currently extended to canine encounters.

MOP 8-16 (Youth Interactions, updated 12/14/2022) recognizes that youth "are still in the stage of developing and learning and may have already experienced trauma that is shaping their behavioral response" and that they "characteristically lack the capacity to exercise mature judgment." The policy establishes several notable safeguards:

- Officers must consider age, intelligence, mental capacity, and physical condition when interacting with youth (Section D.1.b)
- Supervisor notification is required when a youth under 13 is handcuffed, and the supervisor shall respond to the scene (Section E.4.b-c)
- Officers shall not draw and display a firearm on a youth unless the officer has a fear for their or others' safety (Section E.6)
- Officers should select the most reasonable and least restrictive alternative consistent with public safety (Section G.1)
- Handcuffs shall only be used for as long as reasonably necessary and removed as soon as reasonable (Section E.4.a)

Discussion: MOP 8-16 requires supervisor notification when a child under 13 has been handcuffed and restricts drawing a firearm on any youth, and mandates a least-restrictive-alternative analysis. Currently, the canine policy permits deploying a police dog for physical apprehension against any suspect without any age-based restrictions or considerations. In other departments, a canine bite can be considered a higher use of force than handcuffing or displaying a firearm. If GRPD requires a supervisor to be notified when handcuffing a 13-year-old, it is inconsistent with Youth Interactions not to require supervisor approval when deploying a dog trained to bite against a person who may be a juvenile. Canine deployments in building searches, area searches, and foot-pursuit apprehensions may involve young suspects whose age is unknown to the handler. Written policy could be clarified to instruct handlers to consider the possible age of a concealed or fleeing suspect before canine deployment.

4.6 CANINE POLICY VS. DEAF AND HARD OF HEARING (MOP 8-10)

Key Observation: MOP 6-8.1 currently relies on verbal warnings as the standard means of pre-deployment notification.

MOP 8-10 (Deaf and Hard of Hearing, updated 8/20/2024), provides extensive guidance on communicating with persons who are deaf, deaf-blind, or hard of hearing. The policy specifically recognizes that "failure of the person to respond to spoken commands or signals" may indicate hearing loss, not defiance (Section D.1.a.2). It warns officers not to assume that a person who does not respond to verbal commands is being non-compliant.

Discussion: The canine policy's warning approach is entirely verbal. Building-search warnings must be "of sufficient volume to be heard by those inside" (MOP 6-8.1 Section D.1.c.2). Off-lead apprehension requires verbal warnings (Section D.1.e.3). If a suspect does not respond to verbal commands, a handler could interpret silence as non-compliance and proceed with deployment. MOP 8-10 specifically cautions against this assumption, but MOP 6-8.1 does not currently cross-reference that guidance. MOP 8-10 also recognizes that "highly stressful situations, background noise, multiple speakers, and complex information and instructions can compromise the limited

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effectiveness of hearing aids" (Section F.2.g). MOP 6-8.1 does not currently address the need to quiet the canine to allow time for response or to allow a command to be heard clearly.

4.7 CANINE POLICY VS. CUSTODY OF INCAPACITATED PERSONS (MOP 10-2)

Key Observation: Protections established in MOP 10-2 are not currently reflected in canine policy.

MOP 10-2 (Custody of Incapacitated Persons, updated 12/14/2022) defines an incapacitated person as someone whose mental or physical functioning is so impaired by alcohol, drugs, or other substances that they pose a danger to themselves or the public. The policy frames custody of such persons as civil and protective in nature, emphasizing care and transport to treatment rather than arrest.

Discussion: An incapacitated person who is hiding in a building or who has fled on foot may be unable to understand or respond to canine warnings, unable to comply with commands to surrender, or unable to remain still when confronted by a police dog. The canine policy provides no guidance for handlers on how to adjust their deployment when there is reason to believe the suspect may be incapacitated by substances. Cross-referencing MOP 10-2 in MOP 6-8.1 would extend the existing protective framework to canine encounters.

4.8 CANINE POLICY VS. MENTAL HEALTH RESPONSE (MOP 10-3.1)

Key Observation: MOP 10-3.1 establishes a mental health response framework that is not currently cross referenced in MOP 6-8.1.

MOP 10-3.1 (Responding to Persons with Mental Disorders, updated 12/14/2022) is a comprehensive eight-page policy that provides significant guidance on interactions with people experiencing mental health crises. It requires officers to use de-escalation techniques including indicating willingness to help, speaking simply and moving slowly, being patient, announcing actions before initiating them, and avoiding touching except for safety. It recognizes that persons may be suffering from mental illness, developmental or intellectual disabilities, or neurocognitive disorders.

The canine policy contains no cross-reference to MOP 10-3.1 and no vulnerable-population provisions. MOP 6-8.1 does not clarify as to whether a handler deploying a canine for a building search should consider whether the suspect may be a person in mental health crisis, a juvenile, an elderly person, or someone with a cognitive disability. These are important considerations for policy enhancement because canine deployments in buildings and area searches are often situations where a person in crisis may be located, unresponsive to commands, or unable to understand warnings.

Discussion: MOP 10-3.1 requires officers to "stabilize the scene using appropriate de-escalation techniques" and approach in a "calm, non-threatening manner." Because MOP 10-3.1 applies to police contacts generally, explicitly referencing its application to canine deployments would add more clarity in how handlers should adjust their approach where there is reason to believe a subject may have impaired mental function.

4.9 CROSS-POLICY SUMMARY

OPA reviewed MOP 6-8.1's interaction with six related GRPD policies. The principal observation is that MOP 6-8.1 currently operates largely as a standalone framework that is not expressly cross-referenced with the Department's broader force-governance and protective policies. Canine apprehensions are not described within the MOP 9-1.1 force continuum, and the policy's de-escalation and duty-to-intervene provisions are not expressly connected to canine deployments. The youth, deaf and hard-of-hearing, incapacitated-persons, and mental-health protections in MOP 8-16, MOP 8-10, MOP 10-2, and MOP 10-3.1 are not carried into canine encounters, even though building and area searches are precisely the situations in which those populations may be present. Each of these is an opportunity for

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clarification and cross-referencing rather than a finding of deficiency, and each is addressed in the recommendations in Section 7.

4.10 GRPD OPERATIONAL PRACTICES BEYOND WRITTEN POLICY

After completing the review of the written policy, OPA met with GRPD and learned that several operational practices currently followed by the canine unit are not fully reflected in written policy. Because the underlying canine deployment data, bite statistics, and completed Internal Reviews have not been provided to OPA, the practices below are described as GRPD has stated them rather than as independently verified findings. OPA notes those representations as important context. In the interest of transparency and accuracy, a description of GRPD's stated operational practices is included below.

- **Force classification.** GRPD reports that canine apprehensions are treated as a use-of-force event in practice and that a Use of Force Report is required for each apprehension.
- **Apprehension threshold.** GRPD reports that canine deployment decisions are guided by the constitutional reasonableness framework, including *Graham v. Connor (1989)* precedents, and that canine apprehension is reserved for serious situations rather than minor offenses. MOP 6-8.1 Section D.1.e reflects a general totality-of-the-circumstances standard by requiring the handler to weigh the severity of the crime, the threat to officers and citizens, and resistance or flight before a physical apprehension, and Section D.1.f prohibits apprehension in non-serious offense situations where no danger is present. This standard does not limit physical apprehension to serious violent felonies, armed suspects, other defined high-risk situations, or state that flight alone is insufficient in a non-serious offense situation; all of which are included in benchmarking factors of focus for this report.
- **Warning requirements:** GRPD has stated that standardized warnings are taught through training and that any omission must be documented in the Use of Force Report. GRPD also stated that multilingual warnings are not currently required, although peer Cities such as West Covina require multilingual as best practice.
- **Bite-review independence:** GRPD has stated that Internal Affairs reviews all Use of Force Reports, including those involving canine apprehensions that result in bites.
- **Vulnerable-population considerations:** GRPD has stated that officers are trained to weigh a person's status in a vulnerable population as part of the totality-of-the-circumstances analysis applied to any use of force.
- **Training methodology:** GRPD has stated that bite-and-hold is its default canine training methodology.
- **Demographic tracking:** GRPD has stated that demographic information for canine deployments is captured within Use of Force Reports, though the data is not publicly reported or analyzed for patterns and disparities.

These reported practices indicate that GRPD has, in operational terms, moved closer to several nationally recognized policy considerations than the written policy alone reflects. Because the reported practices are not contained in MOP 6-8.1, and because the underlying data has not been provided to OPA, they cannot be independently verified and are not consistently enforceable as written. When a recommendation in Section 7 aligns with a reported GRPD practice,

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OPA's recommendation is to define that practice within MOP 6-8.1 so that it applies uniformly regardless of which handler or supervisor is involved.

5. BEST PRACTICES FROM NATIONALLY RECOGNIZED SOURCES

Across the principal nationally recognized sources reviewed in this study, recurring policy best practices for contemporary canine policies include describing canine apprehension as a use of force, providing structured reporting with supervisory review and program-level monitoring, articulating clear deployment authorization, providing warnings before deployment, supporting robust training and certification, and supporting transparency through public reporting. Each guidance summarized below in descriptive terms. The guidance is not presented as mandatory legal requirements on GRPD. They reflect best practices and recognized accountability safeguards across the profession. The 10 benchmarking factors used in this study are mostly drawn from these sources as stated in section 3.2.

5.1 INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE (IACP)

The International Association of Chiefs of Police (IACP) addresses canine apprehension as a use-of-force option governed by necessity and proportionality. The IACP Patrol Canines Model Policy (2015) and the accompanying Concepts and Issues Paper address structured reporting and review, defined roles for handlers and supervisors, warnings when feasible, and handler control and disengagement. The model policy at Sec. IV.B.5 describes the deployment of a police canine for apprehension as a use of force.

5.2 POLICE EXECUTIVE RESEARCH FORUM (PERF)

The Police Executive Research Forum (PERF) addresses program management, including supervision, training, and continuous evaluation. PERF's Guidance on Policies and Practices for Patrol Canines (2020) addresses structured documentation and trend review to support identification of outlying handler incidents. Bites are described as high-risk, high-liability events that benefit from tight controls and annual public reporting of canine usage statistics. PERF Recommendation 18 addresses supervisory review of every canine contact and bite, and PERF Recommendation 20 addresses annual publication of canine usage data.

5.3. WASHINGTON STATE CRIMINAL JUSTICE TRAINING COMMISSION (CJTC) MODEL POLICY

The Washington State Criminal Justice Training Commission (CJTC) Model Canine Policy (2021) addresses canine policy around reducing violence, preserving life, handler certification, structured reporting, and statewide consistency. The CJTC model expressly supports performance measures such as bite-to-apprehension ratios. The CJTC framework also addresses restrictions for vulnerable populations and standardized warning protocols.

5.4. NATIONAL ASSOCIATION FOR CIVILIAN OVERSIGHT OF LAW ENFORCEMENT (NACOLE)

The National Association for Civilian Oversight of Law Enforcement emphasizes transparency and accessible reporting as foundational to oversight legitimacy. Public reporting helps communities understand police practices and outcomes, reducing information gaps that fuel mistrust.

5.5 PEER-REVIEWED ACADEMIC RESEARCH

Peer-reviewed and federally funded research provides empirical context for canine policy considerations. Adams, Mourtgos, and Nix (2023, Journal of Experimental Criminology) examined Salt Lake City's reform that

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limited canine apprehension deployments and found no statistically significant impact on officer safety outcomes. An NIJ-funded multi-method evaluation linked canine use to suspect injury risk and severity, supporting the value of data-driven program management. Research conducted by Mesloh (2006) examined the relationship between training methodology and bite outcomes.

6. SELECTED PEER CITY COMPARISON

This section provides concise narrative profiles of each peer agency reviewed in this study. The profiles focus on selected policy features that may be useful for GRPD to consider in clarifying or codifying MOP 6-8.1. Agencies are organized to support practical, example-based comparisons and are not ranked in any order. Peer agencies are reviewed against the ten benchmarking factors described in Section 3.2.

6.1 WEST COVINA, CALIFORNIA (POP. ~110,000; GRPD NOMINATION)

West Covina PD's Policy 309 is a comprehensive 20+ page canine directive developed with Lexipol guidance. It was recommended by former City Attorney as a model for the Grand Rapids canine program after a 2023 K9 training.

- **Force Classification:** Canine apprehension is expressly described as a use of force and is subject to the same Use of Force reporting requirements that apply to other force categories.
- **Apprehension Threshold:** Limited to serious offenses with additional conditions including imminent threat, physical resistance, or high-risk concealment. Mere flight does not justify canine apprehension.
- **Supervisor Approval:** An on-scene supervisor or Watch Commander must approve deployment. An exigent circumstance exception requires written justification.
- **Warnings:** Two standardized warnings are required, with community announcements and Spanish-language options. Documentation is required when warnings are omitted.
- **Bite Review:** The canine supervisor conducts an administrative review of bite incidents, consistent with the use-of-force policy. The review is forwarded to the Canine Coordinator (independent oversight role) who reviews all documents related to the Canine Use.
- **Prohibited Uses (Section 309.13):** Absent exigent circumstances, directed bite is not authorized for minor or non-serious crimes or against passively resisting subjects, and a canine is not to be used to apprehend suspects who are clearly elderly, clearly a minor child, or female suspects known to be pregnant.

Analysis for Grand Rapids: West Covina's policy was identified by GRPD as a model agency for their canine program. The gap between what West Covina has codified and what GRPD currently practices is relevant as supervisor approval, explicit vulnerable-population prohibitions, standardized bilingual warnings, and Internal Affairs (IA)-led bite review are present in West Covina PD Policy 309 but absent in GRPD MOP 6-8.1.

6.2 DETROIT, MICHIGAN (POP. ~640,000)

Detroit PD's Directive 201.4 (2022) uses a "find and indicate" training methodology rather than bite-and-hold, explicitly defining canine deployment as force. DPD's approach reflects post-consent-decree governance standards.

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- **Force Classification:** Canine deployment is explicitly listed in the definition of “force” (Section 201.4-3.6). All deployments, including those without apprehension, require a Use of Force Report.
- **Apprehension Threshold:** Based on severity of crime, immediate threat, and active resistance. Dogs should not be used on persons suspected under influence or mentally ill unless threat of death or serious injury.
- **Supervisor Approval:** A canine or Metro Division supervisor must respond and make the final deployment decision for building searches where serious force may occur.
- **Warnings:** Standardized announcement required twice, with 3-minute surrender window. Multi-language accommodations specified. Warnings repeated per building level.
- **Bite Review:** Force Investigations reviews all bite incidents. Canine supervisor and Notification & Control involved. A supervisor is prohibited from closing an investigation due to subject unavailability.
- **Vulnerable Populations:** Canines should not be used to apprehend youth offenders or persons under influence/mentally ill unless necessary to protect from death or serious injury. Use in schools restricted.

Analysis for Grand Rapids: Detroit’s “find and indicate” training model and explicit force classification highlight current policy differences between DPD and GRPD. Detroit’s prohibition on canine use against youth and mentally ill persons absent life-threatening circumstances directly addresses the cross-policy gaps identified between GRPD’s Use of Force and Canine Policy.

6.3 MADISON, WISCONSIN (POP. ~270,000)

Madison PD’s K9 Use SOP (2023) treats canine deployment as an application of force with clear threshold requirements and command-level reporting.

- **Force Classification:** K9 deployment is explicitly classified as an application of force.
- **Apprehension Threshold:** Requires subjects who pose a “significant threat to the safety of officers or the public.” Felony suspects are the minimum threshold.
- **Supervisor Approval:** The K9 Sergeant evaluates deployment necessity with handlers. Handler retains final tactical authority once approved.
- **Warnings:** Three loud verbal announcements required for building searches, including multilingual options when feasible. Reasonable time for response required.
- **Bite Review:** Executive Captain of Operations reviews all bite incidents and K9 use, plus quarterly and annual reports.
- **Transparency and Reporting:** Quarterly and annual reports are required. All canine data is included in the annual Use of Force review.

Analysis for Grand Rapids: Madison’s executive-level review of all canine incidents—not just bites—and mandatory quarterly/annual reporting portray a program-management approach for reporting, differing from GRPD’s incident-level-only review. The K-9 Sergeant’s pre-deployment evaluation with handlers provides a structured check absent in GRPD policy.

6.4 WORCESTER, MASSACHUSETTS (POP. ~206,000)

Worcester PD’s Policy 401 (revised May 2025) is one of the most recently policies in this study. It classifies canine bites as Level 4 use of force and incorporates a notable bite-ratio tracking requirement.

- **Force Classification:** K-9 apprehension (bite) is a Level 4 use of force. Police canine is explicitly listed alongside firearms, batons, and CEWs in the force-reporting framework.

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- **Apprehension Threshold:** Limited to violent felonies or serious misdemeanors where actions pose immediate risk. Minor offenses where subjects pose no threat are excluded.
- **Warnings:** Verbal warnings required, given in three prevalent languages of the city. All warnings must be documented in reports.
- **Bite Ratio Tracking:** The K9 supervisor tracks bite ratios monthly. Performance review is triggered when any handler's ratio exceeds 20% over six months, or when the unit's ratio exceeds that threshold.
- **Bite Review:** K9 supervisor or uninvolved supervisor responds to scene. Suspect interviews conducted on body-worn cameras with Miranda warnings. Reports forwarded to Bureau of Professional Standards and Deputy Chief.
- **Lead Requirement:** All searches conducted on-lead by default. Off-lead requires articulable safety justification.

Analysis for Grand Rapids: Worcester's 20% bite-ratio trigger and monthly tracking provide program-level performance monitoring recommended by PERF currently absent in GRPD performance metrics. On-lead search requirement with documented justification for off-lead use is a practical control GRPD could adopt without significant operational disruption.

6.5 FORT COLLINS, COLORADO (POP. ~170,000)

Fort Collins Police Services Policy 318 is a single and publicly accessible canine policy that consolidates all K9 unit elements within one directive, including a detailed pre-deployment assessment checklist.

- **Force Classification:** Canine deployment is addressed within the force-governance framework, though classification is not as explicit as some peers.
- **Apprehension Threshold:** Requires "serious offense" and at least one additional condition: imminent threat, physical resistance, or high-risk concealment. Mere flight does not justify use.
- **Pre-Deployment Assessment:** Handler and/or supervisor must consider perceived age, nature of offense, danger to public, risk to canine, resistance level, escape potential, and injury potential.
- **Warnings:** Required when feasible. Documentation of whether warning was given and reasons for omission is required.
- **Bite Review:** Supervisor notified; injuries documented with photographs. Review forwarded through chain of command.
- **Training:** National certification required. Regular in-service training documented.

Analysis for Grand Rapids: Fort Collins' explicit pre-deployment checklist includes perceived age which is a practical mechanism for building vulnerable-population considerations into GRPD canine procedures.

6.6 KENT COUNTY SHERIFF'S DEPARTMENT, MICHIGAN (POP. ~663,000; GRPD NOMINATION)

Kent County's Policy 11-1600 provides a regional standard directly comparable to GRPD. The Department reports canine use of force as one of seven major force categories and maintains monthly utilization reports.

- **Force Classification:** Canine use of force is the 4th of 7 major categories in Kent County's use-of-force data and reporting.
- **Apprehension Threshold:** Broad: "any offense" with conditions of imminent threat, physical resistance, or high-risk concealment; however mere flight does not justify canine use.

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- **Supervisor Approval:** Handler has full discretion. A supervisor may prohibit deployment but is not required to approve it.
- **Warnings:** Required unless warning would increase risk of injury or escape. Multi-language provisions included. Shift supervisor notified if warning omitted. All warnings documented in reports.
- **Bite Review:** Canine supervisor reviews; reports forwarded to the Sheriff. Monthly and annual utilization reports prepared.
- **Transparency:** Monthly utilization report to the Sheriff. Annual report filed. Canine force included in public use-of-force data.

Analysis for Grand Rapids: Kent County’s monthly and annual reporting structure provides a model for GRPD’s canine unit, currently lacking public reporting requirements. Kent County’s “any offense” threshold for canine deployment and emphasis on handler expression share some of the same structural concerns identified in GRPD’s policy.

6.7 TRAVERSE CITY, MICHIGAN (POP. ~16,000; GRPD NOMINATION)

Traverse City PD Policy 310 uses the same Lexipol template as West Covina and Fort Collins, providing a useful comparison of how different agencies implement the same framework.

- **Force Classification:** Addressed within the force framework, though not as explicitly classified like some of the larger agencies.
- **Apprehension Threshold:** Requires reasonable suspicion of a “serious offense” plus threat to public. Mere flight does not justify canine apprehension.
- **Supervisor Approval:** Supervisor may prohibit deployment but is not required to approve it. Handlers retain primary tactical authority.
- **Warnings:** Required unless risk of injury or escape would increase. Documentation required when warnings are omitted.
- **Bite Review:** Canine Unit Supervisor reviews. Bite documented in canine use report, included in general incident and arrest reports.
- **Transparency and Reporting:** Annual K9 use report tracks program progression and bite incident numbers. Traverse City produces an annual report on all K9 use within the force.

Analysis for Grand Rapids: Traverse City uses a handler-led discretion model similar to GRPD’s. Its documentation-when-omitted standard for warnings and TCPD’s annual K9 report are examples GRPD could draw on for policy enhancements. While less detailed than larger agencies, TCPD emphasizes Canine unit transparency currently absent in GRPD policy.

6.8 SALT LAKE CITY, UTAH (POP. ~200,000)

Salt Lake City publicly acknowledged serious concerns about bite cases in 2020 and moved to limit canine apprehension deployments. A peer-reviewed study published in the Journal of Experimental Criminology found no statistically significant impact on officer safety outcomes after K9 apprehension deployments were suspended. Adams et al. (2023)

- **Force Classification:** Canine deployment governed under use-of-force framework with full Use of Force reporting requirements.

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- **Apprehension Threshold:** Requires serious offense plus enumerated conditions. Detailed pre-deployment assessment required, including perceived age, weapons, resistance, and whether bystanders can hear warnings.
- **Program-Level Review:** Created a formal program-level review trigger: when bite rates exceed defined thresholds or a handler becomes a statistical outlier, a structured evaluation is required.
- **Warnings:** Required with detailed preparation checklist. Handlers must assess whether innocent persons or children are in the deployment area.
- **Bite Review:** Supervisory review with documented incident reports. Policy references state regulatory framework (UAC R728-507-9).
- **Reform Outcome:** Peer-reviewed research confirmed no negative impact on officer safety after apprehension use was suspended, demonstrating that canine reform need not compromise operational capability.

Analysis for Grand Rapids: Salt Lake City is the closest population match to Grand Rapids and has confronted similar public controversy with its canine unit. Its experience demonstrates that canine policy reform, including suspending apprehension deployments, can be implemented without measurable harm to officer safety. The program-level review displayed a willingness by city and public safety officials to examine K9 use within the Salt Lake City Police Department.

6.9 SPOKANE, WASHINGTON (POP. ~230,000)

Spokane PD's Policy 318 operates within Washington State's CJTC statewide framework, which provides standardized definitions, reporting protocols, and bite-minimization strategies. The city also has an independent Office of the Police Ombudsman.

- **Force Classification:** Canine bites are reported using use-of-force reporting procedures and routed through the supervisory chain of command.
- **Apprehension Threshold:** Requires "serious offense" with imminent threat, physical resistance, or concealment conditions. Mere flight does not justify canine use.
- **Supervisor Approval:** Handler must obtain explicit supervisor permission for community caretaking deployments. For apprehension, handler evaluates but supervisor can prohibit.
- **Warnings:** Mandatory warnings prior to release. Handler must advise supervisor if warning is not given. Documentation of warning status required in all reports.
- **Transparency:** Operates within CJTC framework with bite-to-apprehension ratio tracking. Independent Ombudsman provides external oversight.
- **Statewide Standards:** Washington's CJTC model provides definitions, performance measures, and reporting protocols that enable department-to-department comparisons statewide.

Analysis for Grand Rapids: Spokane's combination of statewide standards, independent ombudsman oversight, and structured reporting creates a three-layer accountability system. The CJTC framework's emphasis on standardized definitions addresses the challenges of cross-department benchmarking identified in MOP 6-8.1 by this report.

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Peer Cities Comparison Summary

Peer agencies profiled in this section present recurring canine policy components that GRPD may find useful when considering enhancements to MOP 6-8.1:

- ✓ Each peer agency expressly identifies canine apprehension within its force-governance framework, although the specific placement and language vary.
- ✓ Most peer agencies articulate a canine-specific apprehension threshold that goes beyond the general constitutional reasonableness standard and addresses severity, threat, and concealment.
- ✓ Several peer agencies (notably West Covina, Detroit, and Salt Lake City) describe vulnerable-population considerations directly within the canine policy.
- ✓ Several peer agencies publish annual canine program data and incorporate that data into broader use-of-force reporting.
- ✓ Most peer agencies expressly address documented justification when warnings are not given.
- ✓ Several peer agencies (notably West Covina and Detroit) describe supervisory approval or concurrence before bite-risk deployments. Others (notably Madison, Worcester, Fort Collins, Traverse City, Salt Lake City, and Spokane) describe supervisory involvement in some form.
- ✓ Several peer agencies route bite reviews through Internal Affairs or a comparable unit outside the canine program.
- ✓ Recall and control provisions are nearly universal across peer canine policies, including GRPD's.

These recurring policy features are reflected in the recommendations in Section 7 and in the comparative matrix in Appendix A.

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7. RECOMMENDATIONS

This section presents recommendations corresponding to the details and analysis provided in this report.

7.1 RECOMMENDATION 1: CLASSIFY CANINE APPREHENSION AS A USE-OF-FORCE OPTION.

Classify canine apprehension as a use-of-force option on the GRPD force continuum and integrate canine apprehension into MOP 9-1.1.

Rationale: MOP 6-8.1 at Section F.1 references a Use of Force Report, but MOP 6-8.1 does not formally include language describing canine apprehension as a use-of-force option. Canine bites are not currently defined or mentioned within the reportable categories of MOP 9-1.1. As discussed in Section 4.10, GRPD has stated that canine apprehensions are treated as a use-of-force event in operational practice. Codifying that practice would extend the Department's existing de-escalation, duty-to-intervene, supervisory review, and reporting requirements to canine deployments, and would integrate canine deployment data into the IAU annual statistical analysis already required under MOP 9-1.1, Section K.2.b. Every peer agency reviewed in this report classifies canine apprehension as a use of force in some form. Consideration should also be given to whether the canine policy would be more appropriately housed in Chapter 9 rather than Chapter 6 of the Manual of Procedures.

Peer and national reference point. IACP Patrol Canine Model Policy, Sec. IV.B.5; PERF Recommendations 17 through 20; Washington State CJTC Model Canine Policy; and the canine policies of West Covina, Detroit, Madison, Worcester, and Salt Lake City describe canine apprehension within the agency's use-of-force framework.

7.2 RECOMMENDATION 2: NARROW THE CANINE APPREHENSION THRESHOLD.

Limit canine physical apprehension to serious violent felonies, suspects who are known or reasonably believed to be armed, or comparable high-risk situations, and state expressly that flight alone does not justify apprehension in a non-serious situation absent an articulable safety threat.

Rationale: MOP 6-8.1 does not provide a specific set of canine apprehension thresholds, instead requiring the handler to weigh the severity of the crime, the threat to officers and citizens, and resistance or flight (Section D.1.e). Section D.1.f prohibits apprehension in non-serious offense situations where no danger is present. MOP 6-8.1 treats severity of the crime one factor in a totality of circumstances for canine apprehension, but does not limit apprehension to serious violent felonies, armed suspects, or comparable high-risk situations. The lack of clarity between "serious" and "non-serious" offenses for canine apprehension, clearly defined in many peer agencies' canine policies, is the basis for this recommendation.

Peer and National reference point. Benchmarked agencies in this report generally name specific offenses or circumstances that justify canine apprehension. West Covina PD reserves apprehension for serious offenses involving an imminent threat or physical resistance and provides that mere flight does not justify it. Worcester limits apprehension to violent felonies and serious misdemeanors posing immediate risk. Madison, Fort Collins, Traverse City, Salt Lake City, and Spokane each apply comparable serious-offense language, with several agencies stating expressly that flight of a suspect alone is not sufficient cause for canine apprehension. The IACP Model Policy (Sec. IV.B.4), PERF Guidance (Chapter 3), and the Washington State CJTC Model Canine Policy are consistent with this approach.

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7.3 RECOMMENDATION 3. ESTABLISH VULNERABLE POPULATION PROTECTIONS

Establish restrictions on canine apprehension involving known or reasonably suspected juveniles, elderly persons, persons in mental health crisis, deaf or hard-of-hearing persons, and incapacitated persons, and incorporate cross-references to the corresponding GRPD policies.

Rationale: GRPD has stated that officers are trained to weigh a person's vulnerable-population status as part of the totality-of-the-circumstances analysis applied to any use of force (Section 4.10). Incorporating this consideration into MOP 6-8.1, and cross-referencing the related policies, would extend the protective frameworks already in effect to canine encounters, including building and area searches where a concealed person's characteristics may not be known. MOP 6-8.1 currently does not contain vulnerable-population provisions, although protections exist elsewhere in GRPD policy under MOP 8-16 (Youth), MOP 10-3.1 (Mental Health), MOP 8-10 (Deaf and Hard of Hearing), and MOP 10-2 (Custody of Incapacitated Persons).

Peer and national reference point. West Covina, Detroit, and Salt Lake City each include vulnerable-population provisions directly within the canine policy. The Washington State CJTC Model Canine Policy and NACOLE oversight guidance each address vulnerable-population considerations in canine policy.

7.4 RECOMMENDATION 4. EXPAND TRANSPARENCY AND REPORTING

Expand public reporting of canine deployments and outcomes and formalize routine OPA access to canine program data.

Rationale: Handler Manual Section 8-1 requires deployment reports for every use, monthly statistics, and quarterly reviews for training logs. Public reporting on deployment totals by type, bite occurrences, bite-to-deployment ratios, injury severity, offense categories, warning compliance, and aggregated demographic information, and could be incorporated into existing annual Use of Force reports produced by the GRPD.

Peer or national reference point. Worcester PD offers a concrete program-level model, where its policy triggers supervisory review when bite ratios exceed 20 percent over a six-month period. PERF Recommendation 20 and Principle 11; NACOLE oversight guidance; and the canine policies of West Covina, Detroit, Madison, and Salt Lake City also incorporate substantial reporting provisions.

7.5 RECOMMENDATION 5: STANDARDIZE WARNING LANGUAGE AND WARNING DOCUMENTATION

Adopt standardized warning language in MOP 6-8.1, require a defined opportunity to surrender, provide for multilingual considerations, and require written justification when a warning is not given.

Rationale: MOP 6-8.1 Section D.1.c(2) requires building-search announcements, and Section D.1.e(3) requires verbal warnings prior to off-lead deployment. Currently, omission of using warning language does not require documented justification for the omission itself. GRPD has stated that standardized warnings are taught through training and that any omission is documented in the Use of Force Report (Section 4.10).

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Peer or national reference point. West Covina, Detroit, Madison, Worcester, Fort Collins, Kent County, Traverse City, Salt Lake City, and Spokane each include written warning language and most include documentation expectations when a warning is not given. Nationally recognized sources include PERF Guidance, Chapter 3; IACP Concepts and Issues Paper; Washington State CJTC Model Canine Policy.

7.6 RECOMMENDATION 6: REQUIRE SUPERVISOR APPROVAL BEFORE DEPLOYMENT

Require supervisory approval, or at minimum, sergeant-level concurrence, before physical apprehension, area-search apprehension, or off-lead deployment.

Rationale: Section D.1 of MOP 6-8.1 authorizes most canine functions without prior supervisory approval, with supervisor involvement required only for the special circumstances in Section D.2. Adding a concurrence expectation for bite-risk deployments would provide a consistent supervisory check and a documented decision point before the highest-risk canine uses.

Peer or national reference point. West Covina addresses on-scene supervisor or Watch Commander approval before deployment. Detroit requires Canine Supervisor or Metro Division supervisor approval before searches where serious force may occur. Madison, Worcester, Fort Collins, Traverse City, Salt Lake City, and Spokane each describe supervisor involvement at varying levels. PERF Recommendation 18 addresses supervisory review of canine deployments.

7.7 RECOMMENDATION 7: MANDATE BITE REPORT REVIEW BY IAU.

Designate Internal Affairs as the primary reviewing authority for canine bite incidents and apprehensions with the Canine Program supervisor providing technical input. Mandate consistent reporting components of a canine bite report review. Formalize routine OPA access to canine program data.

Rationale: Sections F.4 and F.7 of MOP 6-8.1 and Handler Manual Section 11 establish a review in which the Canine Program supervisor conducts the primary review and copies are forwarded to Internal Affairs, the Chief of Police, and the service area commander. Designating Internal Affairs as the primary reviewing authority, and making the review components mandatory, would route canine bites through the same structure that applies to other serious force and ensure each review is complete and independent.

Currently, Section 11-C provides that the on-scene review "may consist of" incident reports, officer and witness interviews, a suspect interview, and injury documentation. Second, when the Canine Unit Supervisor is unavailable, Section 11-B allows another canine handler to conduct the review, which places review within the same unit rather than an independent reviewer. Third, Section 11-A requires an on-scene review only where injury or damage occurs, and a bite with no visible injury may be documented by the handler alone.

Peer and national reference point. West Covina, Detroit, Madison, Worcester, and Salt Lake City each use a unit structurally separate from the canine program to conduct or oversee the primary review. Several departments specify mandatory components such as photographs of injuries and recorded witness interviews. Kent County requires color photographs before and after treatment, recorded post-bite interviews, and veterinarian clearance. Bite-review

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independence and documentation are reflected in PERF Recommendations 18 and 19, the IACP Patrol Canines Model Policy, and the Washington State CJTC Model Canine Policy.

7.8 RECOMMENDATION 8. CLARIFY TRAINING METHODOLOGY IN CANINE POLICY MOP 6-8.2

Specify the canine training methodology applied by GRPD in MOP 6-8.1 and document maintenance training requirements.

Rationale: GRPD has stated that bite-and-hold is its default methodology in training (Section 4.10). Naming the methodology in policy and documenting maintenance-training requirements would bring written policy into alignment with current practice. Handler Manual Section 4 addresses canine and handler selection and the apprehension training framework, and Section 6 establishes weekly in-service training, peer knowledge-sharing, and annual national certification through IPWDA, NAPWDA, or USPCA. The bite methodology itself, however, is not named in either MOP 6-8.1 or the Manual.

Peer or national reference point. Detroit and Salt Lake City expressly name their training methodologies. IACP and PERF guidance and Mesloh (2006) each address the relationship between training methodology and outcomes.

7.9 RECOMMENDATION 9. INCLUDE DEMOGRAPHIC TRACKING IN REPORTING

Collect and analyze demographic data for canine deployments and incorporate that analysis into the IAU annual statistical analysis already required under MOP 9-1.1, Section K.2.b.

Rationale: MOP 6-8.1 does not currently address demographic data collection or analysis for canine deployments. GRPD has indicated that demographic information for canine deployments is captured within Use of Force Reports but is not currently analyzed for patterns or disparities. Extending the existing IAU analytic framework to canine deployments would address this item using a process GRPD already operates for other force categories.

Peer or national reference point. NACOLE oversight guidance and NIJ-funded research each address demographic review for canine programs. Several peer agencies are working toward similar review in their canine reporting.

7.10 IMPLEMENTATION CONSIDERATIONS

The recommendations above are largely codifications of practices GRPD reports it already follows and could be addressed through targeted amendments to MOP 6-8.1 without changes to current field operations: force classification (7.1), threshold articulation (7.2), warning standardization (7.5), bite-review independence (7.7), and training methodology (7.8).

Other recommendations require new written provisions but rely on frameworks already in use elsewhere within GRPD: vulnerable-population protections (7.3) extend existing MOP cross-references, demographic tracking (7.9) extends the existing IAU analytic framework, and expanded reporting (7.4) builds on the existing public dashboard.

The supervisor approval recommendation (7.6) involves a more substantive procedural consideration. It would benefit from consultation between OPA, the Office of the Chief of Police, and the Canine Program supervisor to assess

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operational feasibility and any training or supervisory guidance that may be needed. Appendix A summarizes each factor against written policy and reported practice alongside the recommended enhancement.

8. CONCLUSION

GRPD's canine program is operationally capable, and several parts of the policy reflect current professional expectations. Handlers and dogs are nationally certified, recall is required once a suspect is in custody or no longer presents a reasonable threat, and physical apprehension is not permitted for non-serious offenses where no danger is present. These are meaningful strengths, and the recommendations in this report build on them rather than replace them.

The main observation of the review is that the canine policy sits outside several of the frameworks that already govern other parts of GRPD's work. Canine apprehension is not formally treated as a use of force in the policy, is not listed among the reportable categories in MOP 9-1.1, and is not included in the annual IAU statistical analysis as a distinct, identifiable category. The protections set out in GRPD's youth, mental health, deaf and hard-of-hearing, and incapacitated-persons policies are also not explicitly carried into canine encounters.

This study does not conclude that GRPD's canine policy violates constitutional standards or that officers are using canine force unreasonably. GRPD has indicated that canine deployment decisions are guided by the constitutional reasonableness framework, including *Graham v. Connor* (1989). The report identifies opportunities to enhance written policy, codify practices GRPD reports it already follows, integrate related GRPD policies, and strengthen documentation, review, transparency, and consistency.

After completing the policy-level analysis, OPA met with GRPD and learned that several positive practices are followed in the field that are not reflected in written policy, as described in Section 4.10. The recommendations in Section 7 take that into account: where GRPD already does something well in stated practice, the recommendation is to put that practice into policy, and where a recommendation goes further, it draws on what peer agencies and nationally recognized sources have already adopted. The peer agencies and sources reviewed indicate that these changes can be made incrementally, are compatible with maintaining an effective canine unit, and are within the Department's administrative authority to implement, potentially without changes to existing collective bargaining agreements.

Establishing a defined serious offense threshold, consistent with the benchmarked agencies, would make the Department's expectations clearer and easier to apply and audit, and would reduce the risk that the threshold is read differently by different handlers or supervisors. MOP 6-8.1 sets a general totality-of-the-circumstances standard, requiring the handler to weigh the severity of the crime, the threat to officers and citizens, and resistance or flight, and it prohibits apprehension in non-serious offense situations where no danger is present. Measured against the benchmarking factor, however, the policy does not limit physical canine apprehension to serious violent felonies, armed suspects, or other defined high-risk situations, and it does not state that flight alone is insufficient in a non-serious offense situation.

OPA hopes this report advances the shared goal of making Grand Rapids a City where all people feel safe and are safe at all times throughout our community.

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APPENDICES

APPENDIX A: WRITTEN POLICY AND REPORTED PRACTICE MATRIX

This matrix indicates, using a checkmark, whether each benchmarking factor is reflected in GRPD written policy (MOP 6-8.1 and the K-9 Handler Manual) and whether it is, in some form, addressed in GRPD's reported operational practice as described to OPA by GRPD. The final column states the related recommendation. A checkmark means the factor is referenced in that column in some form. It does not mean the factor is fully aligned with the benchmarking factor. A blank cell means the factor was not identified in that source. Because policies vary in detail, structure, and terminology, the matrix should be read as a high-level summary and not as a full substitute for the narrative analysis in the report.

Benchmarking Factor	Written Policy	Reported Practice	Recommendation
Force Classification		✓	Codify in MOP 6-8.1 and MOP 9-1.1 that canine apprehension and bites are a use of force (Rec. 7.1).
Apprehension Threshold		✓	Limit canine physical apprehension to serious violent felonies, armed suspects, or comparable high-risk situations, and state expressly that flight alone does not justify apprehension in a non-serious offense situation (Rec. 7.2).
Supervisor Approval			Clarify when sergeant-level concurrence is expected before bite-risk deployment (Rec. 7.6).
Warning Requirements	✓	✓	Standardize warning language and require documented justification when a warning is not given (Rec. 7.5).
Bite Incident Review	✓	✓	Designate Internal Affairs as the primary reviewing authority for canine bites (Rec. 7.7).
Vulnerable Population Protections		✓	Cross-reference MOP 8-16, 10-3.1, 8-10, and 10-2 within MOP 6-8.1 (Rec. 7.3).
Transparency and Reporting	✓	✓	Expand the public dashboard and integrate canine data into the annual Use of Force report (Rec. 7.4).
Training Methodology		✓	Name the canine training methodology in MOP 6-8.1 (Rec. 7.8).

Benchmarking Factor	Written Policy	Reported Practice	Recommendation
Demographic Tracking		✓	Integrate canine deployments into the IAU annual statistical analysis (Rec. 7.9).
Recall and Control	✓	✓	Maintain existing language; no change recommended.

Note on apprehension threshold: This factor asks whether canine physical apprehension is limited to serious violent felonies, armed suspects, or comparable high-risk situations. GRPD reported to OPA that it reserves canine apprehension for serious situations rather than minor offenses, and the checkmark in the reported-practice column reflects that statement, consistent with how reported practices are recorded elsewhere in this matrix.

As with the other reported practices, OPA has not received the underlying deployment data, bite statistics, or Internal Reviews that would independently verify it. The written-policy column is left blank because the limitation this factor measures does not appear in MOP 6-8.1. The policy sets a general totality-of-the-circumstances standard in Section D.1.e and prohibits apprehension in “non-serious offense situations” where no danger is present in Section D.1.f, but it does not affirmatively limit physical apprehension to serious violent felonies or to a defined set of high-risk circumstances, and it does not state that flight alone is insufficient in a non-serious offense situation. See Sections 4.10 and 7.2.

APPENDIX C: SOURCE MATERIALS SURVEYED

The following sources were reviewed in developing the benchmarking framework, comparative review, and policy recommendations in this study.

NATIONALLY RECOGNIZED SOURCES FROM PROFESSIONAL ASSOCIATIONS

- International Association of Chiefs of Police (IACP), Patrol Canines Model Policy (2015).
- International Association of Chiefs of Police (IACP), Patrol Canines Concepts and Issues Paper (2015).
- Police Executive Research Forum (PERF), Guidance on Policies and Practices for Patrol Canines (2020).
- Police Executive Research Forum (PERF), Guiding Principles on Use of Force (2016).
- Washington State Criminal Justice Training Commission (CJTC), Model Canine Policy (2021).
- National Association for Civilian Oversight of Law Enforcement (NACOLE), oversight guidance and standards materials.

ACADEMIC AND EMPIRICAL RESEARCH

- Adams, Ian T., Scott M. Mourtgos, Kyle McLean, and Geoffrey P. Alpert. "De-fanged: Outcomes of a Police K-9 Program's Sudden Suspension." *Journal of Experimental Criminology* 19 (2023): 733-753.
- Mesloh, Charlie. "Barks or Bites? The Impact of Training on Police Canine Force Outcomes." *Police Practice and Research* 7, no. 4 (2006): 323-335.
- National Institute of Justice research on police canine use and suspect injury.

GRPD POLICIES AND INTERNAL MATERIALS

- MOP 6-8.1, Canine Program.
- MOP 9-1.1, De-escalation, Response to Resistance, and Use of Force.
- MOP 8-6.1, Emergency Vehicle Operations and Pursuit.
- MOP 8-16, Youth Interactions.
- MOP 8-10, Deaf and Hard of Hearing.
- MOP 10-2, Custody of Incapacitated Persons.
- MOP 10-3.1, Responding to Persons with Mental Disorders.
- GRPD K-9 Handler Manual (provided to OPA by the Chief of Police).
- [City Manager's Report: Follow-Up Actions Regarding February 24 Discussion of Officer-Involved Shooting and Next Steps \(March 17, 2026\).](#)

PEER AGENCY POLICIES

- West Covina Police Department, Policy 309.
- Detroit Police Department, Directive 201.4.
- Madison Police Department, Canine Use Standard Operating Procedure.
- Worcester Police Department, Policy 401.
- Fort Collins Police Services, Policy 318.
- Kent County Sheriff's Department, Policy 11-1600.
- Traverse City Police Department, Policy 310.
- Salt Lake City Police Department, Canine Operations Policy.
- Spokane Police Department, Policy 318.

APPENDIX D: GLOSSARY OF TERMS AND ABBREVIATIONS

Canine Apprehension: A suspect surrenders or is otherwise brought into custody as the result of a canine deployment. This may be because the canine was used as trained, or because the suspect surrendered after becoming aware that the canine might be used. (PERF).

Canine Handler: A sworn law enforcement officer trained and certified to work with a police canine.

Bite to apprehension ratio: The number of canine apprehensions accomplished by means of a canine bite divided by the total number of canine apprehensions both with and without a bite.

Bite-to-Deployment Ratio: A program-level measure comparing bite incidents to total canine deployments. It is commonly used to assess handler and unit performance.

CEW: Conducted Energy Weapon, such as a Taser. An intermediate force option on GRPD's force continuum.

CJTC: Washington State Criminal Justice Training Commission, which publishes model canine policy guidance and related standards.

Consent Decree: A court-enforceable agreement, usually between DOJ and a law enforcement agency, requiring specified reforms.

Bark-and-Hold (Find-and-Bark): A canine training method in which the dog locates a suspect and alerts by barking without biting, allowing officers to take the person into custody.

Bite-and-Hold (Find-and-indicate): A canine training method in which the dog locates a suspect and maintains a bite until the handler orders release.

Graham v. Connor: The 1989 U.S. Supreme Court decision establishing the 'objective reasonableness' standard for evaluating police force under the Fourth Amendment.

IACP: International Association of Chiefs of Police, which publishes model policies and issue papers for law enforcement agencies.

IAU: Internal Affairs Unit, responsible for investigating complaints and force-related incidents within a police agency.

Lexipol: A commercial provider of law enforcement policy templates and training used by some benchmark agencies.

MOP: Manual of Procedures, GRPD's internal policy manual organized by chapter and section.

NACOLE: National Association for Civilian Oversight of Law Enforcement. NACOLE publishes oversight standards and related practice guidance.

OPA: Office of Oversight and Public Accountability, the City of Grand Rapids' civilian oversight office and author of this study.

PERF: Police Executive Research Forum, a policing research and policy organization that has published guidance on patrol canine policy and practice.

UOF: Use of Force. The application of physical tactics or tools by law enforcement to gain compliance or control.

Thank You!

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