ATLANTA POLICE DEPARTMENT

Agency Review and Assessment

Final Report
April 2022

POLICE EXECUTIVE
RESEARCH FORUM

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Executive Summary

Background and PERF's Process

In November 2020, the City of Atlanta, GA, through the Atlanta Committee for Progress, commissioned the Police Executive Research Forum (PERF) to conduct an organizational review and assessment of the Atlanta Police Department (APD). Specifically, PERF was engaged to:
- Create a Kitchen Cabinet of policing experts to advise the Chief of Police and APD leadership team on real-time issues of concern;
- Assess APD's crime reduction strategy and make recommendations;
- Conduct a review of APD policies on police use of force and an assessment of the department's uses of force;
- Review APD's training, including use-of-force training and the field training program;
- Assess and make recommendations on APD's internal and external communications related to reform and crime-fighting efforts.

PERF conducted interviews with APD members of all ranks, Mayor's Office staff members, city council members, community leaders, and others. PERF also worked closely with APD Urban Planning and Management, an Atlanta-based consulting firm that was hired to obtain community input on police reform efforts. PERF participated in a number of focus group and town hall meetings facilitated by APD Urban Planning and Management and incorporated community input into its work and the recommendations in this report.

PERF reviewed and assessed APD's use-of-force policies, procedures, training, and tactics. PERF reviewed departmental policies and training regarding use-of-force as well as APD use-of-force report data. PERF developed proposed recommendations on APD's use-of-force policies and obtained input from APD members of all ranks and community members on PERF's proposals.

PERF also created a Kitchen Cabinet of experienced police leaders and other experts to provide advice, guidance, and support to Chief Rodney Bryant and the APD leadership team. Kitchen Cabinet members included:
- Charles Ramsey, former Commissioner, Philadelphia Police Department and former Chief, Washington, DC Metropolitan Police Department
- James P. O'Neill, former Chief, New York City Police Department
- Scott Thompson, former Chief, Camden County, NJ Police Department
- Michael Harrison, Commissioner of Police, Baltimore Police Department and former Chief, New Orleans Police Department
- Robert C. White, former Chief, Denver Police Department
- Molly Baldwin, Founder and CEO, Roca, an organization that focuses on racial justice
- Anthony Guglielmi, Public Affairs Director, Fairfax, VA Police Department
- Christopher Watler, Chief External Affairs Officer, Center for Employment Opportunities

In addition to the core group of experts, PERF identified and brought in specific subject matter experts and police chiefs to address specific topics. Additional experts included Dallas Chief Edgardo Garcia, Stockton Chief Eric Jones, Long Beach Chief Robert Luna, Memphis Chief C.J. Davis, and Minneapolis Chief Medaria Arradondo. This Kitchen Cabinet met with APD leaders 14 times to discuss challenges and issues and the implementation of proposed solutions. The work focused on developing a crime strategy, improving morale within APD, internal communications, best practices for managing public demonstrations and protests, recruitment of new

officers, and centralizing investigative units. These meetings and follow-up discussions generated recommendations for operational improvements at APD that have been adopted and implemented. These action items are detailed in the report. Major themes are highlighted below.

This report presents PERF's recommendations based on its assessment and review of APD. It is designed to serve as a blueprint for continued improvements on use of force, training, crime strategies, and other issues to bring APD policies in line with best practices in the policing profession. It also documents progress that has been made over the course of PERF's engagement.

Recommendations included in the report stem from findings of PERF's review, which was based upon the expertise PERF has developed in conducting similar reviews for other law enforcement agencies. Throughout the review process, PERF communicated initial findings to APD command staff. APD already has made changes based on these findings and its own review, and PERF has noted in this report instances in which APD already addressed PERF's recommendations.

Continuing the Reform Process with a New Mayor and Administration

PERF completed this report in late December 2021, as a new Mayoral Administration was preparing to take office on January 3, 2022. Incoming Mayor Andre Dickens was endorsed by Mayor Keisha Lance Bottoms, and the mayoral transition is expected to be a cooperative one. Representatives of Mayor Dickens' transition team are working together with representatives of Mayor Bottoms' administration to ensure a smooth transition.

PERF believes that the recommendations in this report can serve as an outline for Mayor Dickens to continue and expand upon the improvements already begun by Mayor Bottoms and APD.

PERF's work will continue following the release of this report. PERF is ready and eager to work with transition officials and the new administration to discuss specific recommendations and the reform process. PERF will also continue to convene meetings of our Kitchen Cabinet of policing experts to discuss crime reduction and other issues detailed in this report.

As noted in this report, APD has made a good start in improving its training of officers with adoption of PERF's Integrating Communications, Assessment, and Tactics (ICAT) program. PERF will continue to work with APD on incorporating ICAT and other training-related reform measures.

Major Findings

Major themes that PERF identified as part of its review are discussed below.

Crime Strategy

The City of Atlanta is experiencing increases in violent crime. These increases reflect national trends. Reasons for the crime increases in Atlanta—confirmed by PERF's stakeholder interviews—include the prevalence of firearms among criminals, police understaffing issues, early

prisoner releases due to COVID-19, and the increasing involvement of juveniles in carjackings and vehicle thefts.

PERF has worked with APD to make improvements to the way it analyzes crime patterns and identifies high-crime locations. As a result of our work, APD has made significant improvements to its COBRA process, which is its internal Compstat. Compstat is a performance management system that is used to reduce crime and achieve other police department goals. Compstat emphasizes information-sharing, responsibility and accountability, and improving effectiveness.[1]

The data shows that much of Atlanta's violence is related to interpersonal disputes (including domestic disputes) or is connected to bars and nightclubs. As a result, APD is working with other city agencies to focus resources on bars and clubs that are associated with violence, and this work has begun to show results.

Opportunities for future work reducing violent crime include:
- **Using data to identify the individuals and groups that are driving violence** or otherwise responsible for crime, and developing strategies to focus attention on these individuals and groups, including prosecution, supervision, and community outreach and engagement.
- Implementing national best practices to **reduce domestic violence**.
- Building a **Real Time Crime Center** that is staffed and supported by civilian crime analysts.
- In partnership with the Mayor's Office, **creating a citywide strategy for reducing violence** that includes APD, community-based violence reduction organizations, other city agencies, and the community. This strategy should include and coordinate all violence reduction efforts, contain an evaluation plan and metrics, and be supported by a communications plan to ensure that all stakeholders and community members have a clear understanding of the city's efforts.

Use-of-Force Policy Review

As part of our overall review of the Atlanta Police Department, PERF reviewed APD's policies on use of force and related topics. Overall, PERF found APD's policies to be strong and in line with minimum standards required by federal, state, and local laws. PERF recommends revisions detailed in this document to bring APD's policies to the level of nationally recognized best practices and exceed minimum legal requirements. We also recommend that APD integrate the principles of PERF's Integrating Communications, Assessment, and Tactics (ICAT) Training and Critical Decision-Making Model into its policies, training, and operations.

All of PERF's recommendations to APD's policies were made with an eye toward meeting the spirit of the recommendations contained in the *APD Use-of-Force Advisory Council Final 45-Day Report and Strategic Recommendations,* dated July 24, 2020, and Administrative Order Number 2020-18, requiring adopting and implementing reforms to APD's standard operating procedures and work rules of the APD regarding police use of force. See Appendix A at the end of this report for a chart that depicts APD's progress in meeting the requirements of these two documents.

In addition to the Use-of-Force Advisory Council's final report, PERF's recommendations are

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1 *Compstat: Its Origins, Evolution, and Future in Law Enforcement Agencies,* Bureau of Justice Assistance and Police Executive Research Forum. https://bja.ojp.gov/sites/g/files/xyckuh186/files/Publications/PERF-Compstat.pdf

based upon PERF's Integrating Communications, Assessment, and Tactics (ICAT) training guide[2] and PERF's Guiding Principles on Use of Force.[3] ICAT and PERF's Guiding Principles are centered on the concepts of proportionality, de-escalation, and the sanctity of human life.

PERF made 49 recommendations to APD's use-of-force policies. To date, APD has adopted 29 of these recommendations, and others are under consideration.

PERF's key policy recommendations include the following:

Combining related use-of-force policies into a single policy, to make it easier for officers and supervisors to find pertinent information on use of force and create a more holistic approach to force within the department. The comprehensive policy should include the agency's philosophy on use of force, clear guidelines regarding lethal and less-lethal force options, and guidelines on the accountability and reporting measures related to use of force.

Emphasizing concepts of proportionality by:
- **Making proportionality a key component of APD's use-of-force policy.** In assessing proportionality, officers should consider the following factors:
  1. Whether the level of force is necessary to mitigate the threat and can safely achieve a lawful objective;
  2. Whether there is another, less injurious option available that will allow the officer to achieve the same objective as effectively and safely; and
  3. Whether the officer's actions will be viewed as appropriate, given the severity of the threat and the totality of the circumstances.
- **Reinforcing proportionality by adding language to its use-of-force policy that states that force needs to be objectively reasonable, necessary, and proportional.**

Going beyond minimum legal standards governing use of force by:
- **Removing the phrase "reasonably appears"** from Section 2.1 and **replacing it with "is necessary and proportional."**
- **Adding language to policy that more clearly defines the basis for using force.** This language should go beyond the minimum legal standard established in the U.S. Supreme Court decision *Graham v. Connor* (1989) and reflect key concepts such as de-escalation and proportionality.
- Adding language to Section 4.1.6 that **when feasible, officers are required to provide warnings and an opportunity to comply before using force. *(Adopted)***

"Slowing down" and de-escalating situations that do not pose an immediate threat by:
- **Expanding policy on tactical repositioning, slowing down certain types of incidents,** and related issues.
- **Using lethal force as a last resort. *(Adopted)***
- Reinforcing that de-escalation is part of the agency's culture. *(Adopted)*
- Clearly **prohibiting certain uses of force,** such as retaliatory force of using lethal force against persons who pose a risk of harm only to themselves and not to others. *(Adopted)*

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2 "ICAT: Integrating Communications, Assessment, and Tactics." Police Executive Research Forum.
https://www.policeforum.org/icat-training-guide

3 "Guiding Principles on Use of Force." Police Executive Research Forum (2016).
http://www.policeforum.org/assets/guidingprinciples1.pdf

Prohibiting shooting at or from **a moving vehicle** except in cases of apparent terrorism.

Monitoring trends on use of force by:
- Requiring that **all use-of-force reports be reviewed by a deputy chief.**
- **Identifying and implementing a use-of-force tracking software solution** that provides the features and integrations it needs.
- **Reviewing use-of-force trends quarterly** for trends or training needs. *(Adopted)*

Creating a Critical Incident Review Board that will evaluate serious uses of force and other critical incidents in order to identify opportunities for improving officer training, making any needed changes in policy, or providing additional equipment to officers. This Review Board should see its mission as comparable to the National Transportation Safety Board's investigations of airline accidents, for the purpose of identifying contributing factors and improving future operations. *(Adopted)*

Integrating duty to intercede within the department's use-of-force philosophy. *(Adopted)*

Adding a non-retaliation requirement that prohibits retaliation, interference, intimidation, or coercion against employees who intervene or report inappropriate uses of force. *(Adopted)*

Use-of-Force Data Review
PERF identified three primary use-of-force findings:
- Officers frequently use Electronic Control Weapons (ECW) in use-of-force incidents and rarely utilize other less-lethal tools.
- Force is being used mostly by younger (21 to 30 years old), less experienced officers (1 to 5 years of service) in the department.
- APD officers used force more frequently against African American suspects than other racial groups.

PERF recommendations include:
- More **in-depth analysis regarding the circumstances and demographic variables** that contribute to the use of force, including analysis of possible reasons for racial differences in use of force,
- More consistent reporting of force data in order to allow **accurate monitoring of trends,** and
- More comprehensive **reporting of force data to the community** in APD's annual reports.

Training
As part of this project, PERF was asked to provide APD with an introduction to PERF's Integrating Communications, Assessment, and Tactics (ICAT) training program. ICAT is designed to increase officer safety and public safety by providing officers with more tools, skills, and options for handling critical incidents, especially those involving subjects who are in crisis but who are not armed with firearms.

In October 2020, PERF staff conducted a virtual train-the-trainer seminar for APD's Training Section staff. In this training, PERF provided an overview of the ICAT curriculum and demonstrated several examples of the scenario-based training that is a key part of ICAT. PERF prefers to provide in-person training and believes it to be more impactful, therefore, in June 2021, PERF staff performed an in-person ICAT training session for approximately 15 APD instructors. PERF continues to work with APD's Training Section to develop materials and training for in-service training in 2022.

PERF staff will attend and observe this training and provide support and feedback to the trainers.

PERF also reviewed other aspects of APD's training programs and made recommendations, including the following:

- **Training Instructors:** APD should evaluate training instructors regularly to ensure that training is being implemented in a consistent manner that is consistent with APD's mission and goals. And APD should involve the Training Section in the policy-making process when it is expected that training will need to be altered in accordance with a new policy directive.
- **Accountability:** APD should require sergeants and lieutenants to monitor the implementation of training in the field. If officers are not in compliance with training, sergeants and lieutenants should intervene and correct the behavior immediately.
- **Field Training:** APD should lengthen and strengthen its field training program for new recruits.

Office of Professional Standards
Based on interviews with APD personnel, the PERF team learned that APD utilizes an Early Intervention System (EIS), but its use is solely limited to internal affairs complaints. **APD should expand the use of its EIS to track and monitor information beyond officer complaints, to include all uses of force, abuse of sick leave, tardiness, and other potentially problematic trends, such as a high number of arrests for disorderly conduct or assault on a police officer.** Other information that APD could track in the EIS are civil actions filed against the officer, criminal investigations of the officer, domestic violence investigations and sexual harassment claims against the officer, vehicular collisions involving the officer, positive drug tests, high rates of cases/arrests dismissed or evidence suppressed in court, insubordination, and neglect of duty.

APD should also upgrade its version of IAPro and expand its capacity to be used as an Early Intervention System. In the alternative, APD should investigate other EIS software solutions from Mark43 and Benchmark Analytics.

Communications
APD faces challenges with both internal and external communications. Internally, PERF was told that there was a breakdown in communications from the top down and the bottom up. Staff members at all ranks identified communications as a challenge.

With respect to external communications, while the Mayor's Office and APD have a strong relationship and share information, they do not have a joint overarching public safety and reform messaging strategy. This may diminish their collective ability to inform the public of the work that APD and the City are doing to reduce crime and improve police policies and practices. A comprehensive communication strategy is needed.

Internal Communications
APD leaders expressed a strong desire to improve internal communications methods to ensure that all APD personnel are well informed about mission, vision, and strategies of the APD; to increase opportunities for input from officers; and to improve employees' morale.

At PERF's suggestion, APD asked APD Urban Planning and Management to conduct focus groups of officers and sergeants to obtain insight and feedback about internal communications. PERF also recommended that APD leaders engage in more direct communication with sergeants instead of relying on information to flow down the chain of command.

Based on PERF's recommendations, APD **_implemented the following measures_** to improve internal communications:

1. Increased messaging to sergeants and officers to ensure that APD's mission, vision, and specific strategies are being communicated properly at all levels of the department.
2. Increased roll call visits by executive command staff to obtain feedback from officers.
3. APD Urban Planning and Management conducted officer focus groups to obtain feedback about internal communications.
4. APD used feedback from officer focus groups to improve its internal communications plan.
5. Expanded content on Chief's Corner, a video platform through which Chief Bryant provides information directly to police officers.
6. Increased promotion of news and information about officers' accomplishments on social media platforms and news media releases.
7. Increased direct messaging from Public Affairs to APD staff to ensure they were informed about significant issues to be reported by the media.
8. Deputy Chiefs conducted divisional Q&A sessions with officers.
9. Expanded the Atlanta Police Leadership Institute (APLI) to include additional sessions with executive command staff. APLI is a local leadership curriculum run by the Atlanta Police Foundation to develop a well-rounded understanding of APD operations and prepare mid-level leaders to manage the challenges facing police.

External Communications

It is critically important to keep the public informed about Atlanta's police reforms and public safety efforts. A coordinated communications strategy including both APD and the Mayor's Office would promote the dissemination of consistent and accurate information. To facilitate transparency and consistent messaging, PERF and APD Urban Planning and Management worked with APD and Mayor's Office communications leaders to develop a unified communications strategy to provide information to the community about the work being done and progress made to date. An outline of this recommended strategy can be found on .

Continuing Progress for the Incoming Administration

Throughout the review process, PERF found members of the Atlanta Police Department to be dedicated to their agency and their community. They expressed a strong desire to improve their performance, serve the community, and be the best at what they do.

Furthermore, as detailed throughout this report, during PERF's entire process of working with APD in 2021, PERF advised APD officials about recommendations we would be making in this report, and **_APD already has implemented many of those recommendations._**

PERF will continue to work with the City of Atlanta and the APD to provide advice and guidance as the City continues to implement PERF's recommendations.

And PERF plans to work with Mayor Dickens and his leadership team to review our key findings and recommendations for improving APD as described in this report.

Introduction

In November 2020, the City of Atlanta, GA, through the Atlanta Committee for Progress, commissioned the Police Executive Research Forum (PERF) to conduct an organizational review and assessment of the Atlanta Police Department (APD). Key elements of this work included creating a Kitchen Cabinet of policing experts to advise the Chief and APD leadership team on real-time issues of concern; assessing APD's crime strategy and making recommendations; and reviewing APD's use-of-force policies and training.

The purpose of the review was not to investigate any specific incident or officer, but to focus on broad trends through the review of policies, procedures, training, strategies, and the department's practices and culture. PERF's review included:

- Interviews of key stakeholders, including APD commanders, Mayor's Office staff members, community partners and City Council members;
- Two multi-day site visits, which included interviews, training review, and ride-alongs;
- An analysis of APD's policies and training related to use of force, on-site and virtual interviews with department personnel of all ranks, and a review of officer-generated reports related to use of force;
- A review of APD's crime analysis capacity and crime strategy;
- Community input, obtained in partnership with APD Urban Planning and Management, through a community survey and facilitated Town Hall meetings and focus groups.

During the review process, APD personnel demonstrated a strong commitment to their community and an openness to recommendations for improvements and new types of training that would help them serve their community. As noted throughout this report, APD leaders already have proactively implemented changes to improve the department's crime analysis, crime strategies, and use-of-force policies. The intention of these recommendations is to build upon these efforts by providing APD with a blueprint for future efforts.

PERF's review is based on the expertise PERF has developed in conducting scores of similar reviews for other city and county law enforcement agencies, PERF's extensive research on use-of-force policies, and a review of policies in law enforcement agencies that have entered into consent decrees with the U.S. Department of Justice due to use-of-force issues.[4]

About the City of Atlanta and the Atlanta Police Department

The City of Atlanta, covering a land area of 134 square miles, is home to 498,715 residents.[5] According to 2020 Census data, the racial composition of Atlanta is 40.9% white, 51% Black or African American, 0.3% American Indian and Alaska Native, 4.4% Asian, and 2.4% two or more races. In terms of ethnicity, 4.3% of Atlanta residents identified as Hispanic or Latino.

The Atlanta Police Department employs approximately 1,661 officers and 460 professional staff members. Eighty-two percent of sworn officers are male and 18% are female. The racial composition of sworn officers is 29% white, 64% Black or African American, 1.5% Asian, and 0.5%

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4   PERF conducted extensive research on the DOJ consent decree process, summarized in our 2013 report *Civil Rights Investigations of Local Police: Lessons Learned*.

5   "Atlanta city, Georgia." United States Census Bureau.
https://www.census.gov/quickfacts/fact/table/atlantacitygeorgia/POP010220#POP010220

FIGURE 0.1

Atlanta Residents and Atlanta Police Department Sworn Officers by Ethnicity and Race

■ **City of Atlanta** ■ **Atlanta Police Department Sworn Officers**
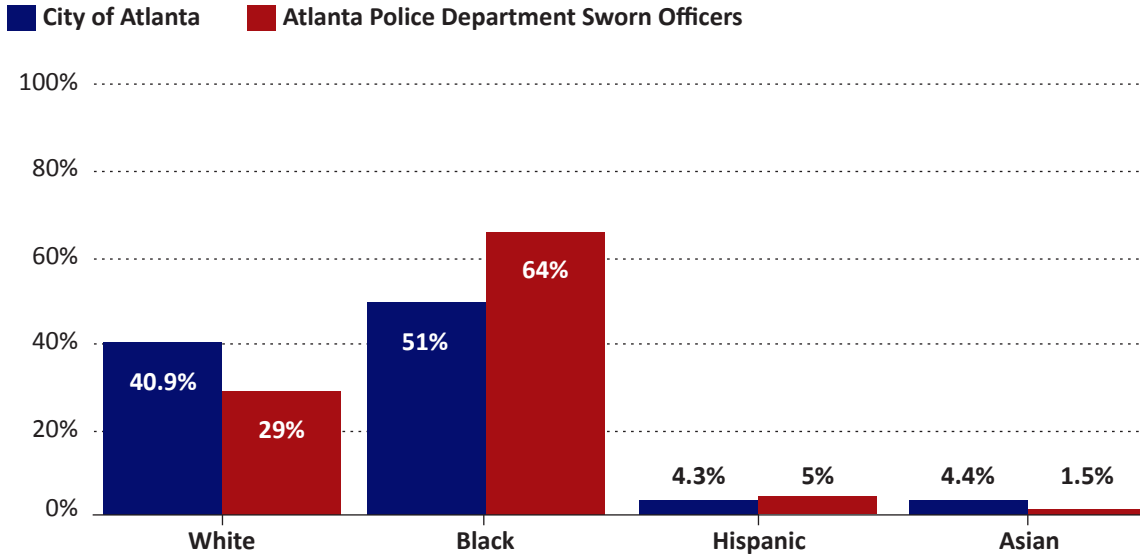
Note: The City of Atlanta also includes 0.3% American Indian and Alaska Native and 2.4% two or more races. The racial composition of APD sworn officers includes 0.5% other.

other. In terms of ethnicity, 5% of officers identify as Hispanic or Latino.

APD is composed of a Field Operations Division, a Criminal Investigations Division, a Support Services Division, a Community Services Division, a Strategy and Special Projects Division, and a 911 Communications Division.

- The Field Operations Division oversees the city's six Zones.
- The Criminal Investigations Division is led by a Deputy Chief who oversees the Major Crimes Section and the Special Enforcement Section, which includes Homicide, Complex Case Squad, Special Victims, Fraud, Criminal Intelligence, and Licenses and Permits. Over the past year, this Division has reorganized to centralize investigations with the goal of improved information sharing and increased clearance rates.
- The Support Services Division (SSD) provides administrative and logistical support to all divisions in the Atlanta Police Department. The division consists of Corporate Services, E911, Information Services, and the Training Academy.
- The Community Services Division (CSD) encompasses units that are directly responsible for coordinating and facilitating Community Oriented Policing principles, Atlanta Airport (HJIA) police functions, Special Operations, and Code Enforcement Section operations. It also includes the Violent Crime Interdiction Section and a Strategic Response Section (SRS), which is composed of the Video Integration Center, Special Events, and Film Liaison (which supports all television and movie filming in Atlanta).
- The Strategy and Special Projects Division (SSP) is responsible for coordinating and facilitating the department's strategic crime fighting initiatives and implementing new technologies and projects. The division consists of the Video Integration Center (VIC), Planning & Research/Accreditation, Staff Inspections, Crime Analysis, the Retired Offi-

cers Force, and the Atlanta Police Leadership Institute (APLI).[6]

APD has also recently created a Technical Information Services Division that reports directly to the Chief. This Division is responsible for implementing a Fusus software that will enable police to access and share surveillance cameras feeds from across the city. APD's goal is to have at least 30,000 cameras sharing their feed to this cloud-based platform and to move from a video integration center to a Real Time Crime Center.

Project Scope and Methodology

The scope of PERF's work included:
- Creating a Kitchen Cabinet of policing experts to advise the Chief and APD leadership team on real-time issues of concern;
- Assessing APD's crime strategy and making recommendations;
- Conducting a review of use-of-force policies, procedures, and tactics;
- Reviewing APD's training, including use-of-force training and the field training program;
- Assessing APD's communications related to reforms and crime-fighting efforts.

To assess these key areas, PERF used the following methodology:

Virtual Interviews and Focus Groups: PERF conducted 22 interviews of key stakeholders, including APD commanders, Mayor's Office staff members, community partners, and City Council members. On February 2, 2021, PERF conducted two focus groups: one consisting of APD officers and the other of APD sergeants.

Site Visits: PERF staff members conducted two site visits to Atlanta in summer 2021 to conduct interviews with stakeholders in the department, view training, conduct ICAT training, and participate in ride-alongs. During these trips, PERF spoke with the Chief, executive staff, commanders, lieutenants, sergeants, patrol officers, APD professional staff members, and Mayor's Office staff members. Additionally, PERF met with personnel from the Office of Professional Standards and the Training Academy. PERF staff also participated in ride-alongs throughout the zones. Before and after the site visits, PERF maintained communication with APD for follow-up questions and data gathering.

Community Input: PERF met weekly with APD Urban Planning ("Urban") and Mayor's Office staff members to ensure continuous community input. PERF worked with Urban to develop and implement a community survey. It also partnered with Urban on focus groups and town halls designed to elicit community input on APD's training and use-of-force policy as well as policy recommendations.

Kitchen Cabinet: PERF created a Kitchen Cabinet of experienced police leaders and other experts to provide advice, guidance, and support to Chief Bryant and APD leaders. Kitchen Cabinet members included:
- Charles Ramsey, former Commissioner, Philadelphia Police Department and former Chief, Washington, DC Metropolitan Police Department
- James P. O'Neill, former Chief, New York City Police Department
- Scott Thompson, former Chief, Camden County, NJ Police Department

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6   Atlanta Police Department Organizational Chart, 2022.

- Michael Harrison, Commissioner of Police, Baltimore Police Department and former Chief, New Orleans Police Department
- Robert C. White, former Chief, Denver Police Department
- Molly Baldwin, Founder and CEO, Roca, an organization that focuses on racial justice
- Anthony Guglielmi, Public Affairs Director, Fairfax, VA Police Department
- Christopher Watler, Chief External Affairs Officer, Center for Employment Opportunities

In addition to the core group of experts, PERF identified and brought in subject matter experts and chiefs to address specific topics. These additional experts included Dallas Chief Edgardo Garcia; Stockton, CA Chief Eric Jones; Long Beach, CA Chief Robert Luna; Memphis Chief C.J. Davis; and Minneapolis Chief Medaria Arradondo. **The Kitchen Cabinet began meeting with Chief Bryant and the APD leadership team on January 8, 2021. The group met 14 times** to discuss challenges and issues affecting the APD and the implementation of proposed solutions. To date, the work has focused on developing a crime strategy, improving morale, internal communications, planning for public demonstrations and protests, recruitment, centralizing investigative units, building a real-time crime center, and holiday deployments.

Crime Strategy: PERF engaged Rachel Boba Santos as a subject matter expert to work with APD and analyze its crime data. Ms. Santos and PERF have assessed and made recommendations to improve APD's crime analysis system and COBRA process. PERF gathered and assessed pertinent data about violent crime and recent crime trends and visited APD on July 12-13, 2021, to meet with commanders and participate in ride-alongs.

Use-of-Force Policy Review and Analysis: PERF reviewed and analyzed APD's policies, procedures, and other documents related to the department's use of force.

Office of Professional Standards Review: PERF interviewed staff members of the Office of Professional Standards and interviewed the head of the Atlanta Civilian Complaint Review Board.

Training Review: PERF conducted a site visit to APD's training facility and reviewed training curricula and scenario-based exercises that relate to use of force and de-escalation. PERF also interviewed training staff members, field training officers, and recent trainees.

PERF was also asked to provide train-the-trainer instruction on PERF's Integrating Communication, Assessment, and Tactics (ICAT) training to selected APD training staff members. **PERF conducted virtual train-the-trainer instruction on October 20-21, 2020, and followed up with a second, in-person ICAT training in June 2021. PERF worked with APD in March 2022 to integrate ICAT principles into department-wide in-service training. PERF plans to continue to work with APD to provide additional training to its trainers.**

This report presents the findings from PERF's review and provides recommendations for how APD can continue to improve its policies and practices. Preliminary recommendations were shared with APD command staff members during the review process, and APD has already begun implementing a number of recommendations that will strengthen its policies, procedures, and training. These updates will be noted throughout the report. PERF's recommendations are based on current research and reflect progressive policing practices that have been adopted in other police agencies.

Section I. Kitchen Cabinet Initiatives

PERF created a Kitchen Cabinet of experienced police leaders and other experts to provide advice, guidance, and support to Chief Bryant and the APD leadership team. Kitchen Cabinet members included:

- Charles Ramsey, former Commissioner, Philadelphia Police Department and former Chief, Washington, DC Metropolitan Police Department
- James P. O'Neill, former Chief, New York City Police Department
- Scott Thompson, former Chief, Camden County, NJ Police Department
- Michael Harrison, Commissioner of Police, Baltimore Police Department and former Chief, New Orleans Police Department
- Robert C. White, former Chief, Denver Police Department
- Molly Baldwin, Founder and CEO, Roca, an organization that focuses on racial justice
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The Kitchen Cabinet began meeting with Chief Bryant and the APD leadership team on January 8, 2021. The group met 14 times to discuss challenges and issues affecting the APD and the implementation of proposed solutions. The work focused on developing a crime strategy, improving morale, internal communications, best practices for managing protests, recruitment, and centralizing investigative units. These meetings and follow-up discussions generated recommendations for operational improvements at APD that were adopted and implemented. Internal and external communications were discussed at several meetings. A list of meeting dates, topics, experts and action items is provided below.

TABLE 1.1
Kitchen Cabinet Meetings

Meeting Date	Kitchen Cabinet Topic	PERF Experts	APD Actions Taken
1/8/2021	Internal and External Communications and Guns Stolen from Cars	Core Kitchen Cabinet (Former Chief Charles Ramsey, Former Chief James O'Neill, Former Chief Scott Thompson, Commissioner Michael Harrison, Former Chief Robert C. White, Molly Baldwin, Anthony Guglielmi and Christopher Watler)	Deployed digital signs in Zone 5 (Midtown); expanded prevention and awareness messaging on all social media platforms; partnered with City Council members to get messages out.

Meeting Date	Kitchen Cabinet Topic	PERF Experts	APD Actions Taken
1/15/2021	Crime Strategy	Core Kitchen Cabinet	Compared current strategies to those suggested by experts; increased messaging to officers to develop fidelity to strategy implementation; increased roll call visits by executive command staff for feedback and buy-in.
1/21/2021	Community Policing/Crime Strategy	Core Kitchen Cabinet	Compared current strategies to those suggested by experts; increased messaging to rank and file to develop fidelity to strategy implementation; increased roll call visits by executive command staff for feedback and buy in.
2/4/2021	Officer Morale	Core Kitchen Cabinet	Conducted officer focus groups; created "good news/good deeds" newsletter; put verification process in place to ensure that officers are getting information; Chief met with officers and frontline supervisors; executive command staff regularly attended roll calls
2/23/2021	Officer Morale and Best Practices for Managing Demonstrations	Core Kitchen Cabinet	Used feedback from focus groups to enhance internal communications plan; increased content on "Chief Corner"; expanded officer accomplishments content on social media platforms and news media releases; increased direct messaging from Public Affairs to APD staff; Deputy Chiefs conducted divisional Q&A sessions; expanded APLI to include additional sessions with executive command staff.
3/5/2021	Practices for Managing Demonstrations	Core Kitchen Cabinet and Minneapolis Chief Medaria Arradondo	Conducted on-site planning meetings with GA National Guard, federal, state, and local partners; coordinated with EAP on field support in future protests; confirmed strategy of not creating static lines of officers; established reoccurring meetings with Concerned Black Clergy.

Meeting Date	Kitchen Cabinet Topic	PERF Experts	APD Actions Taken
3/19/2021	Officer Wellness	Chief Chris Chew of Evesham, NJ Police Department; Brian Nanavaty, retired from Indianapolis Police Department; Jessica Toliver from PERF	Assessed officer wellness programs; expanded Peer Support program and added 55 sworn/professional members; added Peer Support and EAP modules to APLI; APD members added to interview panel for EAP staff; developed an Officer Wellness training for front line supervisors; assessing the feasibility of a dedicated Officer Wellness Unit.
4/2/2021	Crime Analysis	Dr. Rachel Boba-Santos	Adopted Stratified Policing model for TCAU/COBRA; revamped analysis for COBRA format; retained Dr. Santos to support Summer Crime Plan; developed crime pattern bulletins; Stratified Policing training for TCAU and Command Staff; revamped COBRA report.
4/16/2021	Recruitment	Deputy Commissioner Jim Gillis, Baltimore Police Department, and Marvin Haiman, Executive Director, Professional Development Bureau, Washington, DC Metropolitan Police Department	Implemented a digital application management system; hired six civilian employees to work on recruitment and hiring; retained an outside recruitment expert.
4/30/2021	Investigations: Centralized vs. Decentralized Units	Chief Peter Newsham, Prince William Police Department; Chief Melissa Hyatt, Baltimore County Police; Sean Malinowski, former Los Angeles Police Department, and Shawn Ferguson, New Orleans Police Department	Completed centralization of department's criminal investigations structure; restructured investigations to focus on gangs, bars, and related crimes citywide; co-located investigative units to facilitate better communication.
8/5/2021	Violent Crime Reduction Strategy (Part 1 of 2)	Former Camden County, NJ Chief Scott Thomson; Stockton, CA Chief Eric Jones; and Dr. Santos	

Meeting Date	Kitchen Cabinet Topic	PERF Experts	APD Actions Taken
9/3/2021	Violent Crime Reduction Strategy (Part 2 of 2)	Scott Thomson; Chief Eric Jones; Commissioner Michael Harrison; Long Beach Chief Robert Luna; and Dallas Chief Eddie Garcia	Experts suggested expanding online and telephone reporting for shoplifting and other minor offenses; APD interested in expanding citywide efforts to conduct joint enforcement efforts at bars and clubs; use of violence interrupters and citywide strategy to reduce violence; need to engage other state and city agencies and community leaders.
9/17/2021	Real Time Crime Centers	Memphis Chief C.J. Davis and Assistant Chief Don Crowe; Charlotte- Mecklenburg, NC Chief Johnny Jennings; and Baltimore Commissioner Michael Harrison	APD has 1,500 cameras and license plate readers (LPRs) and is integrating 10,000 other federated cameras; purchasing integration software to see all cameras in one place; participated in site visits and information exchanges with Memphis, Charlotte, Baltimore, and Washington, DC to develop best practice plan for Real Time Crime Center.
10/22/2021	Holiday Crime Prevention Strategies	Houston Executive Chief Matt Slinkard; Executive Lieutenant for Community Engagement Lawrence Davis of the Austin, TX Police Department; Scott Thomson	Increased uniformed and marked car presence; conducted holiday crime safety presentations before holidays; conducted DWI enforcement. Additional recommendations include learning more about the Greater Houston Loss Prevention Alliance; increasing public messaging about leaving items, money, and guns in cars; working with retailers and malls on proactive security plans; developing safe places to exchange for community-based resale; using data to drive deployment; increasing messaging about storing guns safely in cars.
1/28/2022	Office of Violence Prevention	Tiffany Collins, Director of Strategic Initiatives in Memphis; Patrick Young, Director, Office of Gun Violence Prevention, New Orleans; Shantay Jackson, Baltimore Mayor's Office of Neighborhood Safety and Engagement, and Commissioner Harrison from Baltimore	Discussed relationship between Offices of Violence Prevention and police; shared ideas about coordination of citywide gun violence strategies and programs; planned ongoing dialogue and information sharing.

Internal Communications

APD leaders expressed an interest in improving internal communications methods to ensure that all APD personnel are properly informed about the department's mission, vision, and strategy; to increase opportunities for input from officers; and to improve morale. As a result of Kitchen Cabinet meetings and recommendations, **APD leaders implemented the following measures** to improve internal communications:

1. Increased messaging to sergeants and officers to ensure that APD's mission, vision, and specific strategies are being communicated properly at all levels of the department.
2. Increased roll call visits by executive command staff to obtain feedback from officers.
3. APD Urban Planning and Management conducted officer focus groups to obtain feedback about internal communications.
4. APD used feedback from officer focus groups to improve its internal communications plan.
5. Expanded content on Chief's Corner, a video platform through which Chief Bryant provides information directly to police officers.
6. Increased promotion of news and information about officers' accomplishments on social media platforms and news media releases.
7. Increased direct messaging from Public Affairs to APD staff to ensure they were informed about significant issues to be reported by the media.
8. Deputy Chiefs conducted divisional Q&A sessions with officers.
9. Expanded the Atlanta Police Leadership Institute (APLI) to include additional sessions with executive command staff. APLI is a local leadership curriculum run by the Atlanta Police Foundation to develop a well-rounded understanding of APD operations and prepare mid-level leaders to manage the challenges facing police.

Thefts from Autos

Car break-ins and theft of guns from automobiles are a significant crime challenge identified by APD. As a result of Kitchen Cabinet discussions about how to best prevent car break-ins, APD deployed digital signs with prevention messages in Zone 5 (Midtown), which was experiencing a high number of car break-ins; expanded crime prevention and awareness messaging on social media platforms; and reached out to City Council members to ask for their help with prevention messaging. PERF is working with APD personnel to have additional peer information exchanges with the Houston and San Francisco Police Departments, which are encountering similar challenges.

> **RECOMMENDATION:** APD should continue to utilize APD social media platforms, community meetings and events, digital signboards, and proactive patrols to increase awareness and prevention of car break-ins and thefts. Analysts should continue to identify trends and provide awareness to Zone commanders on at least a weekly basis and daily if needed. APD should evaluate other programs including those in Houston and San Francisco for implementation.

Officer Wellness and Morale

Police officer wellness and morale are a concern in law enforcement agencies nationwide. APD leaders expressed concern for the well-being of all APD personnel and a desire to expand officer wellness programs. PERF engaged Chief Christopher Chew of the Evesham Township, NJ Police Department, who has expertise in officer wellness programs, to assist APD in making improvements to its program. APD has officer wellness supports in place to respond to critical incidents and assist officers who seek out assistance. As a result of the Kitchen Cabinet meetings, APD has worked to expand and improve these supports.

APD has expanded the capacity of its Peer Support Program at the first line and mid-supervisors' levels, for both professional staff members and officers, by adding 55 sworn/professional members to serve as peer supporters. Peer Support has also been added to the APLI curriculum to ensure that employee care and mental health support are part of APD's leadership development programing. APD has developed Officer Wellness training for front line supervisors and is assessing the feasibility of creating a dedicated Officer Wellness Unit.

PERF recommends that APD conduct an assessment of its officer wellness programs and develop proactive initiatives in consultation with PERF staff and Chief Chew.

> **RECOMMENDATION:** Conduct an assessment of APD's officer wellness programs and develop proactive officer wellness initiatives. PERF has made expert resources available to APD to support and facilitate this work.

Recruitment

Like many other law enforcement agencies, APD is seeking to recruit and hire a large number of new officers. Mayor Lance-Bottoms announced an initiative to hire an additional 250 officers in 2022. PERF's experts recommended that APD streamline its application process, use civilian employees to process applications, and obtain external professional assistance to refine its recruitment efforts. As a result, APD has implemented a digital application management system, is hiring six civilian employees to support the recruitment unit, and has retained an outside recruitment expert. APD is also working with Emory University to assess officer retention and obtain a better understanding of why officers leave, and what incentives and practices can be put in place to retain officers.

> **RECOMMENDATION:** APD should continuously examine its recruitment and hiring process to assess whether initiatives are delivering expected outcomes.

RECOMMENDATION: APD should invest in effective application and processing management software to simplify and streamline the hiring process. This software should have the capacity to identify phases where applicants are dropping out or being disqualified, and break the data down by race, gender, ethnicity, and other factors to assess opportunities for improvement. This software should allow for all applicant information, including the initial application and personal history information, to be submitted via a single system. For example, eSOPH is a software system used by departments (including the Metropolitan Police Department of Washington, DC) that has dramatically reduced the departments' processing time.

RECOMMENDATION: APD recruiters should contact applicants as soon as feasible to establish personal contact with each applicant, which sends an important signal that APD is an open, welcoming organization.

Demonstrations and Protests

APD managed a number of demonstrations and protests over the past two years. One Kitchen Cabinet session was focused on sharing information about best practices related to managing demonstrations. At that meeting, experts recommended that APD engage in ongoing planning meetings with federal, state, and local law enforcement partners, create measures to support officers on the front lines of demonstrations, and develop proactive relationships with community groups.

In early 2022, PERF will publish an updated guide for response to protests and demonstrations. This report examines the large numbers of demonstrations that occurred across the United States in the summer and fall of 2020 and the unprecedented violence that occurred in many cities. It provides 35 recommendations for actions that law enforcement agencies can take to improve their planning for, and response to, demonstrations in their communities.

The demonstrations of 2020 were especially difficult to manage because the protests were about policing. In some jurisdictions, the police response to the demonstrations added to the anger and distrust toward the police that many demonstrators felt. It is difficult for police to meet with protest leaders and discuss how to facilitate peaceful demonstrations when the leaders view the police as the enemy.

Engaging the community is vitally needed to achieve the twin goals of safeguarding First Amendment rights and protecting public safety. The challenge is to find new approaches to working with community leaders during peaceful times, and then engaging them in new ways when demonstrations emerge.

RECOMMENDATION: APD should develop and tend relationships with community leaders to ensure that there is open communication and information-sharing in the event of protests. Transparency will benefit the police and the community.

Understanding the importance of open communication with the community during protests, APD leadership has established regular meetings with Concerned Black Clergy of Metropolitan Atlanta.

RECOMMENDATION: APD should develop and implement resources and strategies to support officers who are serving on the front lines during protests and often experience stress and trauma. APD should have proactive and reactive resources to support these officers in the field.

APD has coordinated with Atlanta's Employee Assistance Program to develop a plan for field support in the event of future protests.

RECOMMENDATION: APD should engage in ongoing planning meetings and training exercises with federal, state and local law enforcement partners to bolster preparedness and coordination of future protests or demonstrations.

APD has conducted on-site planning meetings with GA National Guard and other partners to prepare for potential future protests and confirmed its operational strategies.

A number of the Kitchen Cabinet meetings focused on APD's crime strategies, specifically strategies to reduce violent crime. These efforts are detailed in the "Crime Strategy" section below.

Section II. Crime Strategy

The City of Atlanta is experiencing increases in almost all Part 1 Violent and Property Crimes.[7] PERF reviewed Part 1 crime data provided by the Atlanta Police Department that compared year-to-date crime rates from October 2, 2020, to October 2, 2021.[8] Most Part 1 crimes saw double-digit percentage increases, with the exceptions of Robbery (0% change) and Burglary (31% decrease). These increases are in line with national trends. PERF's recent national violent crime survey found that there was an increase in the total numbers of homicides and aggravated assaults in the first seven months of 2021 compared to the same period in 2020, and a decrease in the number of robberies reported by the responding agencies.[9]

Reasons for the crime increases in Atlanta—confirmed by stakeholder interviews—include the prevalence of firearms among criminals, police staffing issues, early prisoner releases due to COVID-19, and the increasing involvement of juveniles in carjackings and vehicle thefts.

PERF has worked with APD to make improvements to the way it analyzes crime patterns and identifies high-crime locations. As a result of our work, APD has made significant improvements to its COBRA process, which is its internal Compstat. Compstat is a performance management system that is used to reduce crime and achieve other police department goals. Compstat emphasizes information-sharing, responsibility and accountability, and improving effectiveness.[10] The data shows that much of Atlanta's violence is related to interpersonal disputes (including domestic disputes) or connected to bars and nightclubs. As a result, APD is working with other city agencies to focus resources on bars and clubs that are associated with violence, and this work has started showing results.

Opportunities for future work reducing violent crime include:
- Using data to identify the people and groups that are driving/responsible for violence and developing strategies to focus attention on them as appropriate, including prosecution, supervision, and community outreach and engagement.
- Implementing national best practices to reduce domestic violence by adding a dedicated domestic violence unit to each zone and implementing a Lethality Assessment program.
- Building a Real Time Crime Center that is staffed and supported by civilian crime analysts.
- In partnership with the Mayor's Office, creating a citywide strategy related to reducing violence that involves community partners.

Crime Analysis

As a first step, PERF engaged Dr. Rachel Boba Santos as a subject matter expert to work with APD and analyze its crime data. Dr. Santos and the PERF project team met with Deputy Chief

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7   Part 1 Violent Crimes include Murder, Rape, Robbery and Aggravated Assault. Part 1 Property Crimes include Burglary, Larceny from Auto, Larceny (other) and Auto Theft.

8   Atlanta Police Department Weekly COBRA Report (10/2/21) https://www.atlantapd.org/i-want-to/crime-data-downloads

9   PERF Special Report: Violent Crime Trends https://www.policeforum.org/violentcrimesurveyseptember2021

10   *Compstat: Its Origins, Evolution, and Future In Law Enforcement Agencies*, Bureau of Justice Assistance and Police Executive Research Forum. https://bja.ojp.gov/sites/g/files/xyckuh186/files/Publications/PERF-Compstat.pdf

Darin Schierbaum and APD crime analysts multiple times. In February 2021, Dr. Santos reviewed and assessed APD's data and crime analysis statistics, maps, and other crime analysis products; interviewed command staff; and conducted focus groups with patrol majors and the crime analysis unit. In March and April 2021, Dr. Santos attended COBRA Meetings. Dr. Santos continued to attend COBRA meetings throughout May and June and worked with APD to (1) implement a strategy known as "Stratified Policing" and (2) to make improvements in APD's crime analysis.

Stratified Policing: Stratified Policing is an organizational model for proactive crime reduction and accountability. The model outlines a structure of stratified problem-solving responsibility, specific crime analysis products, and a structured set of accountability meetings, so that both place-based and person-based crime reduction strategies can be implemented and institutionalized into the day-to-day practices of the police department. Problem-solving, analysis, and accountability processes become part of the day-to-day organizational structure of the police department, with the goal of increasing the effectiveness and efficiency of crime reduction efforts.[11]

Crime Analysis: Dr. Santos developed a specific crime analysis training for APD, and in May conducted a Crime Analysis for Stratified Policing Training for the entire Tactical Crime Analysis Unit (TCAU) staff and chain-of-command. Dr. Santos and PERF arranged a virtual visit for APD to attend Ft. Myers, Florida's CITISTAT session. APD had a follow-up Q&A session with the Ft. Myers Police Department's command and crime analysis staff. Based on these sessions and discussions with the Kitchen Cabinet, APD began adopting and implementing a Stratified Policing model for its COBRA sessions. Dr. Santos was retained by APD as a consultant over the summer.

In June, Dr. Santos worked with APD to update internal data products and crime analysis content and modify COBRA to align with the Stratified Policing model. As a result of Dr. Santos's work, APD has made significant changes and improvements to the COBRA format, processes and products. APD has modified its weekly crime discussions to focus more on problem areas, to ensure that a commander is assigned to each area, to focus on discussion and tracking of wanted persons, to modify the way the department looks at crime from a weekly to monthly view, to expand the outside partners participating in COBRA, and to modify the mapping/analysis charts to guide the weekly discussions.

APD has also created Power Bi dashboards that provide real-time crime data available to all members of the department. APD crime analysts are developing new reports for each of the Zones, detailing specific crime problems. There are also efforts under way to create a plan to hire civilian crime analysts. Dr. Santos continues to support improvements in crime analysis and implementation of Stratified Policing at APD. Current efforts include identifying specific individuals who are driving violence and developing suppression and intervention strategies.

> **RECOMMENDATION:** PERF recommends that APD continue to implement the Stratified Policing Model and new COBRA format.

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11   Santos, R.G., & Santos, R.B. (2020). *Stratified Policing: An organizational model for proactive crime reduction and accountability.* Rowman & Littlefield.

RECOMMENDATION: PERF recommends that APD continue to improve and refine its data products, disseminate them to the Zones, and get feedback from the Zones on the products.

RECOMMENDATION: PERF recommends that APD pursue its efforts to create civilian crime analyst positions for the department and ultimately hire civilian crime analysts.

RECOMMENDATION: APD should use data to identify the individuals and groups that are driving violence and develop suppression and intervention strategies, including prosecution, supervision, and community outreach and engagement.

While APD has made changes to its COBRA process and improved its centralized data analysis and products, some Zone Commanders are still relying on their Zone-based crime analysts and may not be utilizing these new tools and products. PERF recommends that APD take steps to inform Zone personnel about the new data tools, provide training where needed, and ensure that commanders have the technology to access and use these tools.

RECOMMENDATION: PERF recommends that APD make concerted efforts to inform Zone personnel about new data analysis capacity, tools, and products. PERF also recommends that APD provide training to Zone personnel on the new data tools available, ensure that all Zones have access to these tools, and that all Zones have software capacity to access the tools and data.

Identifying Crime Challenges

PERF collaborated with APD to gather and assess pertinent data about violent crime and recent crime trends. PERF staff visited APD on July 12-13 to meet with commanders and participate in ride-alongs. Based on a review of the data and interviews with commanders, much of the violent crime in Atlanta is connected to interpersonal disputes and specific bars and nightclubs. There is also a concern that domestic violence is also on the rise.

Other challenges identified include:
- A lack of transparency from the courts and prosecutors;
- A lack of real-time information sharing between criminal justice agencies about case status and sentencing;
- A perception that the criminal justice system is a revolving door;
- Inadequate staffing levels and patrol coverage;
- An increase in guns stolen from cars; and
- A diversion of police resources required to manage protests and demonstrations, which depleted staffing for other duties.

Based on the data and reports from commanders, most violent crime is connected to interper-

sonal disputes and bars and clubs. Domestic violence is also on the rise.

Opportunities and recommendations for reducing violent crime are detailed below and include:
- Expanding its existing multi-agency work to reduce violence related to bars and night-clubs.
- Implementing national best practices to reduce domestic violence.
- Building a Real Time Crime Center that is staffed and supported by civilian crime ana-lysts.
- In partnership with the Mayor's Office, creating a citywide strategy related to reducing violence that involves community partners.

Bars and Nightclubs

Between January 1 and October 19, 2021, APD recorded 55 crimes of violence related to bars and nightclubs in 2021. This includes two homicides, three rapes, 36 aggravated assaults, and 14 robberies. APD has taken a multi-pronged approach to address this violence associated with bars and clubs. These actions include using the regulatory and licensing authority of other government agencies to increase accountability and address conditions that pose risks to public health or safety at these locations. As part of this effort, License and Permits have been completing inspections along with the Atlanta Fire Department, State of Georgia, and the City Solicitor's Office. The Mayor's Office convenes a Nuisance Property Committee weekly to foster collaborative problem-solving and accountability with respect to locations that present a threat to public health and/or public safety. The group is monitoring and taking action at 32 locations, including 11 bars and nightclubs. Their works has resulted in the issuance of fines and revoca-tion of certificates of occupancy.

> **RECOMMENDATION:** In addition to the Nuisance Property Committee, APD and the City would benefit from a formalized multidisciplinary task force to perform joint inspec-tions and enforcement actions at nuisance properties, particularly bars, nightclubs, and restaurants operating as after-hours establishments. Members should include APD Code Enforcement and Special Enforcement, Atlanta Fire Department, Licensing and Permits, Fulton County Environmental Health, Office of Transportation (to take enforcement action against illegal valets), and any other pertinent agencies that have enforcement powers related to bars and clubs.

Centralization of Investigative Units

In April and May of 2021, APD also assessed the structure of its Criminal Investigations Division and sought input from the Kitchen Cabinet on the most efficient and effective structure for this Division. One significant question was whether investigative units should be centralized or decentralized. There are strengths and challenges to each approach, and there is no one-size-fits-all approach. Based on its own internal analysis and input from the Kitchen Cabinet, APD decided to centralize its criminal investigations structure and create a dedicated domestic violence unit.

The benefits of having investigators in the same room working the same cases were immediate. The units were able to identify the same groups and crews committing crimes throughout the

city, instead of only in one small area of a zone. This information-sharing and improved communication have already had a significant impact and benefit within the unit and the working relationship between the Gangs Unit and Homeland Security Unit. APD has co-located its Gangs Unit and Auto Theft Unit (which investigates when cars are stolen) in the same suite and are working to add the Theft from Auto Unit (which investigates when items are stolen from a car) in the same area to further improve the communications between the teams.

> **RECOMMENDATION:** Now that investigations are centralized, APD should create a mechanism to share investigative status and case closure information to zone personnel. In addition, zone personnel should have clear channels of communication to investigators to share information and leads about open cases.

> **RECOMMENDATION:** APD should evaluate the impact of centralizing its investigative units at six months and one year after the date of centralization and make adjustments to the new approach if needed. APD leaders must consider investigators' and zone commanders' input on the change; examine case outcomes; and consider feedback from other stakeholders, including victims and prosecutors, to determine whether centralization of key investigative functions is the most effective strategy for APD.

Domestic Violence

In March 2021, APD reported a 193% increase in Part I Domestic Crime compared to 2019 data. As part of its process to centralize investigative units, APD formed a centralized domestic violence unit that began operations on June 24th, 2021. The unit has one lieutenant, two sergeants, and eight investigators. The team works seven days a week from 8:00 a.m. to midnight and handles all domestic violence crimes per the Georgia State Statute (19-13-1). The lieutenant is working with Microsoft to build a dashboard that provides up-to-date information on the cases assigned. This dashboard enables the supervisors to track cases quickly, identify deficiencies, and link suspects.

APD should also consider creating a partnership with a local domestic violence services agency and implementing a Lethality Assessment Program. The goals of Lethality Assessment Programs are to educate domestic violence victims about risk factors for homicide, and to connect them with support and safety planning services. In this type of program, during a domestic violence investigation, the police officer administers a brief risk assessment screen to the victim. This "Lethality Screen" is an 11-item questionnaire that assesses the victim's level of risk for being killed by the offender.[12] If the victim screens as "high risk," the police officer informs the victim of his/her risk and calls the domestic violence hotline at the collaborating partner organization, which offers assistance with safety planning and gives the victim an opportunity to speak directly with a victim advocate.

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12 "Domestic Violence Lethality Screen for First Responders."
https://nij.ojp.gov/sites/g/files/xyckuh171/files/media/document/domestic-violence-screening.pdf

RECOMMENDATION: Investigate the feasibility of partnering with a local domestic violence victim advocacy organization to develop and implement a Lethality Assessment Program.[13] Most police departments in Maryland, including the Anne Arundel County Police Department use lethality assessment tools to help identify domestic violence victims who may be in danger of serious injury or death. The assessment uses 11 questions to determine the potential danger to a victim. Certain responses will trigger a referral for victim assistance. Officers put the victim in touch with domestic violence counselors and encourage them to take recommended safety steps. A sample policy is included below.[14]

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13 https://www.nccpsafety.org/assets/files/library/Domestic_Violence_Lethality_Screen.pdf; "Lethality Assessment Program Report – In Response to House Bill 1371." Maryland Police Training and Standards Commission, December 2016. https://mdle.net/pdf/HB1371-Report_regarding_Lethality_Assessment_Program_12-1-16.pdf

14 Anne Arundel County, MD Police Department. "Domestic Violence, Index Code 1603." Effective Date: 11-15-21. https://public.powerdms.com/aac/documents/225

RECOMMENDATION: APD should consider adding a domestic violence unit to each zone responsible for assisting victims of domestic violence with obtaining protective orders or appropriate criminal charges, assist officers and local prosecutors with case enhancement criminal case preparation, and maintaining a liaison with key domestic violence stakeholders.

RECOMMENDATION: APD analyst should create a weekly report that identifies all addresses that officers have responded to two or more times for domestic violence calls in the last 28 days. Domestic violence officers assigned to the zones should examine these reports and conduct analysis and follow-up investigations to proactively assist domestic violence victims with the goal of reducing incidence of family violence.

Partnerships

APD personnel expressed concern about a lack of information and transparency from other criminal justice agencies. It can be difficult to follow cases through to completion and obtain information about arrestees who are released. While some of these issues are beyond the control of APD, PERF recommends that APD leaders strive to build stronger relationships and information-sharing mechanisms with criminal justice partners. Some jurisdictions have created criminal justice coordinating committees to facilitate these relationships and information sharing. Others have invited criminal justice partners to co-locate staff in their Real Time Crime Centers.

RECOMMENDATION: APD would benefit from stronger partnerships and information-sharing mechanisms with state parole and probation agencies and local, state, and federal prosecution offices.

Telephone Reporting of Minor Offenses

Like many other police departments throughout the country, APD is experience staffing shortages and challenges with recruitment and hiring. Several APD commanders expressed frustration with the amount of time officers spend taking reports for minor offenses, such as shoplifting when there is no suspect at the premises. PERF recommends that APD consider expanding the use of its online and telephone reporting capacity to include shoplifting and other minor crimes, in order to make the best use of its patrol resources.

Currently, APD only accepts online reporting for four types of crimes (harassing phone calls/texts/emails; vandalism; lost property; and identity theft) as well as missing trash bins. Other police departments nationwide allow a broader range of crimes to be reported by phone or online, including non-injury auto accidents, hit and run, larceny from auto, and larceny. This would help free up officers to patrol their beats.

> **RECOMMENDATION:** APD should consider expanding the scope of its online and telephone reporting to include additional crimes, including theft from auto and shoplifting where the theft amount is small and there is no suspect. PERF has provided policy samples for expanded online and telephone reporting processes to help alleviate call volume on low-level calls not needing a police response. A sample telephone reporting policy from the Baltimore Police Department can be found below.[15] In addition, the Louisville Metropolitan Police Department (LMPD) website describes how a community member can file a report by telephone or online. A link to LMPD's website is below.[16]
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> 15   Baltimore Police Department. "Policy 506: Telephone Reporting Unit (TRU)." February 12, 2020.
> https://public.powerdms.com/BALTIMOREMD/documents/66353#:~:text=The%20Baltimore%20Police%20Department%20
> (BPD,citizens%2C%20and%20address%20community%20concerns
>
> 16   Louisville Metro Police Department. "File a Police Report." https://louisville-police.org/187/File-a-Police-Report

Real Time Crime Center

Real Time Crime Centers (RTCC) centralize a broad range of technologies, coordinate personnel, and streamline intelligence to direct police attention to high-crime areas, active crimes in progress, large public events that may require a police response, and violent repeat offenders in the community. RTCCs enable police to respond to crimes more efficiently, with improved operational intelligence, and with an emphasis on community safety and officer safety.

The APD is working to develop an RTCC and sought information about national best practices. At a recent Kitchen Cabinet meeting, representatives from the Charlotte-Mecklenburg and Memphis Police Departments shared information about their RTCCs, including the technologies that they use, their partnerships, staffing, and other operational details. PERF also supported site visits and peer exchanges between Charlotte; Memphis; Washington, DC; Baltimore; and the APD to support the creation of a best-practice RTCC.

> **RECOMMENDATION:** APD should consider hiring professional crime analysts to provide staff support and crime analysis in the Real Time Crime Center.

> **RECOMMENDATION:** APD should develop a strategy to proactively utilize its camera and LPR resources and should use professional APD personnel to monitor cameras and other technology deployed in the Real Time Crime Center.

Citywide Strategy

There are a number of efforts in Atlanta to reduce crime and violence, but they do not appear to be connected and coordinated. Efforts include:

- Development of a joint City-County Center for Diversion and Services (Diversion Center), which will serve as a 24/7 law enforcement drop off point offering co-located services and connections to resources for people needing assistance related to mental health, homelessness, substance use, and poverty
- Establishment of an intergovernmental, multi-stakeholder Justice Policy Board tasked with overseeing Diversion Center development, impact, and success, as well as strengthening and expanding metro Atlanta's continuum of supportive services and resources
- Expansion of the Policing Alternatives and Diversion Initiative, which provides mobile law enforcement diversion and accepts community referrals for people experiencing extreme poverty, problematic substance use, or mental health concerns[17]
- The newly launched Mayor's Office of Violence Reduction[18]
- President Biden's Community Violence Initiative
- Cure Violence program implementation[19]

Prior initiatives include:

- The Mayor's Anti-Violence Task Force, which issued written recommendations[20]
- The One Atlanta One APD Plan to Address Violent Crime[21]

While these efforts have merit, they do not appear well coordinated or understood by the public at large. Additionally, other city agencies and the community have a significant role to play in citywide effort to reduce violence.

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17   City of Atlanta Press Release. "Police Alternatives and Diversion Now Available Citywide." July 1, 2021. https://www.atlantaga.gov/Home/Components/News/News/13775/672

18   Axios Atlanta. "Atlanta establishes office to reduce violent crime." October 8, 2021. https://www.axios.com/local/atlanta/2021/10/08/atlanta-office-violent-crime-reduction

19   The Crime Report. Center on Media, Crime and Justice at John Jay College. " 'Cure Violence' Programs Credited with Decline in Atlanta, Milwaukee Shootings." September 30, 2021. https://thecrimereport.org/2021/09/30/cure-violence-programs-credited-with-decline-in-atlanta-milwaukee-shootings/

20   City of Atlanta Press Release. "Mayor's Anti-Violence Advisory Council Delivers Recommendations to Address COVID Crime Wave." July 16, 2021. https://www.atlantaga.gov/Home/Components/News/News/13789/672

21   One Atlanta: One APD. "Immediate Action Plan to Address Violent Crime." https://www.atlantaga.gov/Home/ShowDocument?id=49353

RECOMMENDATION: The City of Atlanta should adopt a coordinated, citywide violence reduction strategy that includes APD, community-based violence reduction organizations, other city agencies, and the community. **This type of initiative will require strong city leadership and commitment from elected officials.** This strategy should include and coordinate all violence reduction efforts, contain an evaluation plan and metrics, and be supported by a communications plan to ensure that all stakeholders and community members have a clear understanding of the city's plan, implementation status, and results. This plan should also include Atlanta's plans for alternatives to arrest and incarceration of individuals experiencing homelessness, substance abuse, and poverty.

Section III. Use-Of-Force Policy Review

As part of the overall review of the Atlanta Police Department (APD), PERF reviewed APD's policies on use of force and related topics. **Overall, PERF found APD's policies to be strong and in line with minimum standards required by federal, state, and local laws. PERF recommends the revisions detailed in this document to bring APD's policies to the level of nationally recognized best practices that exceed minimum legal requirements. We also recommend that APD integrate the principles of PERF's Integrating Communications, Assessment, and Tactics (ICAT) Training and Critical Decision-Making Model into its policies, training, and operations.**

All of PERF's recommendations to APD's policies were made with an eye toward meeting the spirit of the recommendations contained in the *APD Use-of-Force Advisory Council Final 45-Day Report and Strategic Recommendations,* dated July 24, 2020, and Administrative Order Number 2020-18, requiring adopting and implementing reforms to APD's standard operating procedures and work rules of the APD as they pertain to use of force. Please refer to Appendix A at the end of this report for a chart that compares APD's progress in meeting the requirements of these two documents.

In addition to the Use-of-Force Advisory Council's final report, PERF's recommendations are based upon PERF's Integrating Communications, Assessment, and Tactics (ICAT) training guide and PERF's 30 Guiding Principles on Use of Force. ICAT is centered on the concepts of proportionality, de-escalation, and the sanctity of human life.

PERF's Integrating Communications, Assessment, and Tactics Training Guide

To help law enforcement agencies implement PERF's 30 Guiding Principles on Use of Force,[22] PERF developed *ICAT: Integrating Communications, Assessment, and Tactics,*[23] a training guide that represents a new way of thinking about use-of-force training for American police officers. ICAT takes the essential building blocks of critical thinking, crisis intervention, communications, and tactics and puts them together in an integrated approach to training.

ICAT is designed to increase officer safety and public safety by providing officers with more skills, tools, and options for handling critical incidents, especially those involving subjects who are in crisis but who are not armed with firearms. The cornerstones of ICAT include slowing incidents down in order to avoid reaching a point where there is a need to use force, upholding the sanctity of human life, building community trust, and protecting officers from physical, emotional, and legal harm.

The ICAT Training Guide is composed of the following topics:
- Introduction to ICAT
- Critical Decision-Making Model
- Crisis Recognition and Response
- Tactical Communications
- Operational Safety Tactics
- Integration and Practice
- "Suicide by Cop" Incidents

The ICAT Training Guide includes model lesson plans, scenario-based training exercises, PowerPoint presentations, case study videos of use-of-force incidents, and other resources. The Training Guide was developed with the help of a working group of more than 60 professionals representing law enforcement agencies and other organizations from across the country. A panel of 10 policing experts reviewed a draft of the Training Guide, and the training was pilot-tested in seven sites throughout the country.

Feedback from the expert review and pilot sites was incorporated into a final report,[24] and in 2016, PERF held a national meeting on how to implement ICAT Training. This meeting, held in New Orleans, was attended by more than 400 individuals representing more than 160 police agencies. To date, more than 500 law enforcement agencies have attended ICAT training meetings.

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22   Police Executive Research Forum (2016). *Guiding Principles on Use of Force.* https://www.policeforum.org/assets/guidingprinciples1.pdf

23   Police Executive Research Forum (2016). *ICAT: Integrating Communications, Assessment, and Tactics. Training Guide for Defusing Critical Incidents.* http://www.policeforum.org/assets/icattrainingguide.pdf

24   Ibid.

A critical component of ICAT is the Critical Decision-Making Model (CDM). The CDM helps offi-cers to develop critical thinking skills that will help them identify the best strategies and tactics to more safely resolve any type of situation they encounter, including incidents that might involve a use of force, or might be resolved without force.

Critical Decision-Making Model

Elements of the CDM
The Critical Decision-Making Model is a five-step critical thinking process. All five steps are built around the core values of the department and the policing profession. The CDM should be a driving philosophy throughout APD and should be used in all aspects of use-of-force deci-sion-making. This includes training, supervisory review, report writing, and the review of critical incidents.

CDM Core
At the center of the CDM is an ethical core that provides grounding and guidance for the entire process. The four elements of the CDM core are:
- Police ethics
- Agency values
- Concept of proportionality
- Sanctity of human life.

Every step of the process is connected to this core, and the core informs and guides officers throughout the five steps
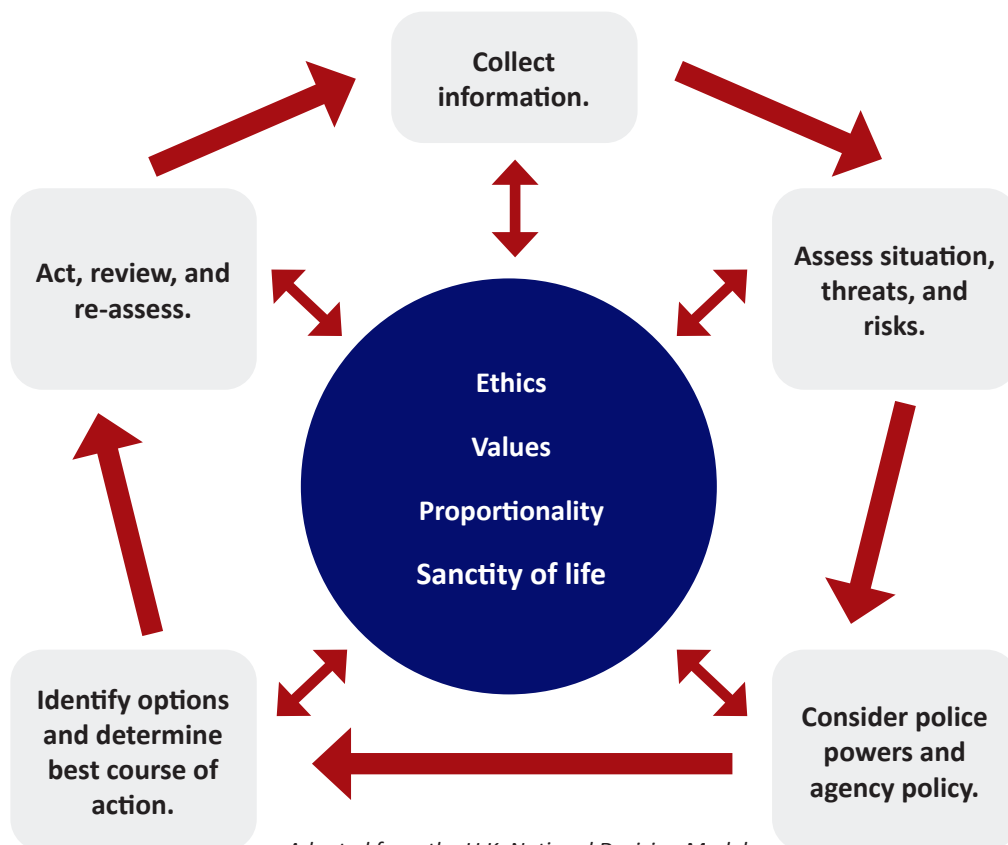
Adapted from the U.K. National Decision Model

While our recommendations reflect PERF's recent work on use-of-force, APD should ensure that they become the foundation of APD's organizational culture and influence the way APD does business.

PERF made 49 recommendations regarding APD's use-of-force policies. To date, APD has adopted 29 of these recommendations. *All recommendations and adoption status are detailed below.*

One of the recommendations contained in the *APD Use-of-Force Advisory Council Final 45-Day Report and Strategic Recommendations* is to strengthen the department's use-of-force continuum. PERF disagrees, because PERF does not encourage the use of a use-of-force continuum. PERF has found that while these continuums may help officers in the decision to *escalate* force, they do not promote or provide sufficient guidance related to *de-escalating* encounters. PERF recommends the adoption of a critical decision-making model (CDM) in place of a use-of-force continuum to aid officers. PERF will train APD in the use of the CDM as part of our overall project with APD.

RECOMMENDATION: APD should adopt the Critical Decision-Making Model (CDM) department-wide. CDM helps officers to develop critical thinking skills that will help them identify the best strategies and tactics to more safely resolve any type of situation they encounter, including incidents that might involve a use of force or might be resolved without force.

APD has expressed a commitment to adopt and implement this recommendation and is in the process of working to integrate CDM principles into its recruit and in-service training.

How Does APD Implement Change?

APD should develop an implementation plan that synchronizes policy changes with training. The implementation plan should include a timeline and tracking mechanism to ensure that all policy changes and training are adopted. APD leaders should identify and engage first-line supervisors in this process. PERF provided APD's trainers with additional training on our Integrating Communications, Assessment, and Tactics (ICAT) program in the Summer of 2021. PERF's ICAT training is centered on key concepts such as proportionality and de-escalation, which are at the heart of PERF's policy recommendations. A key component of our ICAT training involves instructing APD personnel on the Critical Decision-Making Model (CDM). The CDM can be used in all aspects of use-of-force decision-making. This includes training, supervisory review, report writing, and the review of critical incidents. PERF also recommends that some professional staff members, including communications personnel and dispatchers, participate in ICAT training.

This section presents recommendations for how APD can continue to improve its use-of-force policies, as well as specific recommendations for strengthening language in current policies. **Policies and recommendations are presented in sequential order based on the policy number and not in priority order.**

SOP .2022 Early Intervention and Early Warning System

Early Intervention and Early Warning Systems are discussed in greater detail on , and recommendations for APD can be found there.

Early Warning System: Documentation and Reporting

Section 4.9 discusses documentation and reporting requirements, but only for APD's Early Warning Review. APD should add language to this section for the department's documentation and reporting requirements for its Early Intervention System (e.g., documentation for retraining, etc.). APD should document what steps were taken to investigate the issue/behavior, the findings of the investigation, and the actions taken to address the issue/behavior. This information should be documented in a memo that details the nature of the issue and corrective actions taken.

> **RECOMMENDATION: Add documentation and reporting requirements for APD's Early Intervention System.** APD should add documentation and reporting requirements for its Early Intervention System to Section 4.9. This should include what steps were taken to investigate the issue/behavior, the findings of the investigation, and the actions taken to address the issue/behavior. This information should be documented in a memo that details the nature of the issue and corrective actions.
>
> *APD has adopted this recommendation for implementation. Additional recommendations for improving APD's Early Intervention System are discussed on of this report.*

SOP .3010 Use of Force

SOP .3010 Use of Force governs the department's overall approach to use of force. The version PERF reviewed was a draft version dated January 22, 2021.

Overall Policy Organization

APD should consider consolidating its current use-of-force policies to ensure clarity and ease of reference. When issues pertaining to use of force are broken into numerous policies, there is a chance that revisions may not be applied uniformly. For example, the department's current Electronic Control Weapon (Taser) policy is in a standalone document. APD would be better served if issues related to use of force were combined under a single use-of-force policy. This would also make updating the policy easier, because all of the critical components would be located in the same document. Another benefit of having a combined policy is that the department's overall use-of-force philosophy (including de-escalation, proportionality, and the Critical Decision-Making Model) is contained in one document.

> **RECOMMENDATION: Combine related use-of-force policies into a single policy.** This will make it easier for officers and supervisors to find pertinent information on use of force and will create a more holistic approach to force within the department. This comprehensive policy should include the agency's philosophy on use of force, clear guidelines regarding lethal and less-lethal force options, and guidelines on the accountability and reporting measures related to use of force.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

2. Policy

Section 2.1 states that "Sworn employees, who in the performance of their duties, encounter situations where the use of force reasonably appears necessary to effect an arrest or detention, overcome resistance, control a subject, or protect themselves or others from injury or death will only use that force which is reasonable and necessary in order to accomplish lawful objectives."

This section is reflective of the U.S. Supreme Court's 1989 decision in *Graham v. Connor*,[25] which establishes a general standard of "objective reasonableness" regarding police use-of-force. Objective reasonableness represents the legal standard by which police use of force is judged by the courts, and it is critical that any use-of-force policy articulate that standard.

However, *Graham* provides only broad legal principles for how the objective reasonableness standard should be applied. The brief decision contains no more than a few sentences that provide practical guidance to police officers about actually making use-of-force decisions. As of 2021, the Supreme Court has effectively left it up to individual police agencies to determine how to best incorporate *Graham's* basic principles into their own policies, training, and tactics.

Many police departments have chosen to go beyond the bare requirements of *Graham*. For example, many police agencies have detailed policies and training on issues such as prohibiting or tightly limiting shooting at moving vehicles, rules on pursuits, guidelines on the use of Electronic Control Weapons (ECWs), and many other use-of-force issues that are not mentioned in or required by *Graham*.

Furthermore, new concepts in use-of-force policy and practice often reflect expectations of American communities about police use of force, particularly in assessing whether force in any given situation is not only legal, but also necessary, proportional, and ethical. In this sense, use-of-force policies and practices currently employed by many police agencies seek to go beyond the minimum legal standard established in *Graham*.

In fact, a federal appeals court in 2016 held that professional standards in policing can sometimes become incorporated in new legal standards. (The case, *Armstrong v. the Village of Pinehurst et al.*,[26] involved the use of an Electronic Control Weapon against a mentally ill man. The Fourth Circuit U.S. Court of Appeals cited ECW guidelines produced by PERF and the Justice De-

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25 *Graham v. Connor,* 490 U.S. 386 (1989). http://caselaw.findlaw.com/us-supreme-court/490/386.html

26 *Armstrong v. the Village of Pinehurst,* No. 15-1191. January 11, 2016.
https://www.ca4.uscourts.gov/Opinions/Published/151191.P.pdf

partment's COPS Office to reach the conclusion that "immediately tasing a non-criminal, mentally ill individual, who seconds before had been conversational, was not a proportional response.")

RECOMMENDATION: Remove the phrase "reasonably appears" from Section 2.1 and replace it with "is necessary and proportional." This change helps integrate the concept of proportionality into Section 2.1.

This recommendation remains under review by APD and has not been adopted at this time.

RECOMMENDATION: Add language to policy that more clearly defines the basis for using force. APD should strengthen policy by adding language to this section that more clearly defines the basis for using force. This language should go beyond the minimum legal standard established in the U.S. Supreme Court decision *Graham v. Connor* (1989) and should reflect key concepts such as de-escalation and proportionality. These concepts should also be incorporated into all of APD's policies, practices, and training on use of force.

This recommendation remains under review by APD and has not been adopted at this time.

RECOMMENDATION: Add language to Section 4.1.6 that, when feasible, officers are required to provide warnings and an opportunity to comply before using force. APD should strengthen this policy, which states, "An employee's ultimate goal with every encounter involving a suspect is to gain voluntary compliance without having to use any of the APD approved use-of-force options," by requiring officers to provide warnings and an opportunity to comply.

APD has adopted this recommendation for implementation.

RECOMMENDATION: Expand policy on tactical repositioning, slowing down certain types of incidents, and related issues. APD's use-of-force policy should require that officers consider issues of proportionality, the use of distance and cover, tactical repositioning, "slowing down" situations that do not pose an immediate threat, calling for supervisors and other resources, and similar actions and tactics. **For example, the Camden County, NJ Police Department's use-of-force policy states that "when force cannot be avoided through de-escalation or other techniques, officers must use no more force than is proportionate to the circumstances… Some of the factors that officers should consider when determining how much force to use include…whether further de-escalation techniques are feasible, …the time available to an officer to make a decision, and whether additional time could be gained through tactical means…."**

This recommendation remains under review by APD and has not been adopted at this time.

> **RECOMMENDATION: Make proportionality a key component of APD's use-of-force policy.** APD should add language to Section 2.0 Policy stating that force used by officers should be proportional to the threat. In assessing whether a response is proportional to the threat being faced, officers should consider the following factors:
> - Whether the level of force is necessary to mitigate the threat and can safely achieve a lawful objective;
> - Whether there is another, less injurious option available that will allow the officer to achieve the same objective as effectively and safely; and
> - Whether the officer's actions will be viewed as appropriate, given the severity of the threat and the totality of the circumstances.
>
> ***This recommendation remains under review by APD and has not been adopted at this time.***

The concept of proportionality does not mean that officers, at the moment they have determined that a particular use-of-force is necessary and appropriate to mitigate a threat, should stop and consider how their actions will be viewed by others. Rather, officers should begin considering what might be appropriate and proportional as they approach an incident, and they should keep this consideration in their minds as they are assessing the situation and deciding how to respond. Proportionality also considers the nature and severity of the underlying events.

4.1 Use-of-Force Generally

APD should add language to this section that officers must consider a subject's age, frailty, and evident medical/mental conditions as a factor in their decision to use force. This language will emphasize the department's approach to proportionality as discussed above.

> **RECOMMENDATION: Add factors for officers to consider in guiding their decisions about whether or how to use force.** APD should add language to this section that officers must consider a subject's age, frailty, and evident medical/mental conditions as a factor in their decision to use force.
>
> ***APD has adopted this recommendation for implementation.***

APD should clearly state in policy that the following types of force are STRICTLY PROHIBITED:
- Retaliatory force;
- Use-of-force against subject(s) who only verbally confront officers and are not involved in criminal conduct;
- Use of lethal force against individuals who are only a danger to themselves and not others.

> **RECOMMENDATION: Clearly prohibit certain uses of force.** APD should add language to policy prohibiting certain types of force. This includes the use of retaliatory force; use of force against subject(s) who only verbally confront officers and are not involved in criminal conduct themselves; and lethal force against individuals who pose a risk of harm only to themselves and not others.
>
> *==APD has adopted this recommendation for implementation.==*

Section 4.1.2 states that "Employees will use only the amount of objectively reasonable force (as defined in Section 5.6 Reasonable) necessary to successfully protect themselves and others, to effect an arrest, or to bring an incident under control when dealing with members of the community, suspects or prisoners." APD should add language to this section stating that force needs to be objectively reasonable, but also *necessary and proportional.*

For example, the Seattle Police Department's use-of-force policy states that "an officer shall use only force that is objectively reasonable, necessary, and proportional to the threat or resistance of a subject."[27] The Baltimore Police Department's use-of-force policy states that "Members shall use only the force Reasonable, Necessary, and Proportional to respond to the threat or resistance to effectively and safely resolve an incident, and will immediately reduce the level of force as the threat or resistance diminishes."[28] Similarly, the Camden Police Department's Policy states that "*officers may only use force that is objectively reasonable, necessary, and as a last resort.*"[29]

> **RECOMMENDATION: Reinforce proportionality.** APD should add language to Section 4.1.2 stating that force needs to be objectively reasonable, necessary, and proportional.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

Section 4.1.5 states that "De-escalation techniques shall be continuously developed, updated and made part of the continuing training delivered to all police officers by the training academy." APD should add language reinforcing that de-escalation is part of APD's culture.

> **RECOMMENDATION: Reinforce de-escalation.** APD should add language to Section 4.1.5 reinforcing that de-escalation is part of the agency's culture.
>
> *==APD has adopted this recommendation for implementation.==*

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27 Seattle Police Department Manual. "8.000 – Use of Force Core Principles." April 15, 2021. http://www.seattle.gov/police-manual/title-8---use-of-force/8000---use-of-force-core-principles

28 Baltimore Police Department. "Use of Force Policy Number 1115." https://www.baltimorepolice.org/1115-use-force

29 Camden County Police Department. "Volume 3, Chapter 2. Subject: Use of Force." January 28, 2013. https://static1.squarespace.com/static/58a33e881b631bc60d4f8b31/t/5d5c89c2e3bc4c000192f311/1566345667504/CCPD+UOF+Policy+%288.21.19%29+%28FINAL%29.pdf

4.2 Use of Deadly Force

This section states when officers are authorized to use lethal force. Recommendations related to specific subsections are detailed below.

4.2.1 De-escalation

Section 4.2.1 states that "All employees present during a police/citizen contact will make every effort throughout the entire encounter to de-escalate a situation in order to prevent the use of deadly force."

This section can be strengthened by modifying it as indicated in the recommendation below.

> **RECOMMENDATION: Use of lethal force as a last resort:** APD should reword Section 4.2.1 as follows: "All employees present during a police/citizen contact will make every effort throughout the entire encounter to de-escalate a situation [insert new phrase: "and exhaust other means reasonably available"] in order to prevent the use of deadly force. **The use of lethal force should be an officer's last resort.**" [bold and underline]
>
> *APD has adopted this recommendation for implementation. This concept is a central component of PERF's ICAT training.*

4.2.2 Authorization to Use Deadly Force

The first paragraph of Section 4.2.2 states that an officer may use deadly force to apprehend a suspected felon only when "he or she reasonably believes that the suspect possesses a deadly weapon or any object, device, or instrument which, when used offensively against a person, is likely to or actually does result in serious bodily injury and when he or she reasonably believes that the suspect poses an immediate threat of serious bodily injury to the officer or others."

APD should modify this paragraph as indicated in the recommendation below.

> **RECOMMENDATION: Add additional language to the first paragraph of Section 4.2.2.** APD should modify the first paragraph as follows: "… he or she reasonably believes that the suspect possesses a deadly weapon or any object, device, or instrument which, when used offensively against a person, is likely to or actually does result in serious bodily injury [insert new phrase: "or threat of death"] **and when he or she reasonably believes that the suspect poses an immediate threat of serious bodily injury to the officer or others."** [bold and underline]
>
> APD should encourage the use of de-escalation and CDM strategies unless there is an immediate threat of serious bodily harm.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

The second paragraph of Section 4.2.2 states that an officer may use deadly force to apprehend a suspected felon only when "there is probable cause to believe that the suspect has committed a crime involving the infliction or threatened infliction of serious physical harm (O.C.G.A. Section 17-4-20) and the employee reasonably believes that the suspect's escape would create a continuing danger of serious physical harm to any person."

APD should modify this paragraph by adding the phrase "or death" after the phrase "serious physical harm."

> **RECOMMENDATION: Add a new phrase to the second paragraph of Section 4.2.2.** APD should add the phrase "or death" after the phrase "serious physical harm" to the second paragraph of Section 4.2.2.
>
> *APD has adopted this recommendation for implementation.*

Shooting at Vehicles

There is no language in APD's use-of-force policy regarding shooting at vehicles. Instead, guidance is contained in APD's pursuit policy (SOP .3050 Pursuit Policy) and simply states "Discharging a firearm in an effort to stop a fleeing vehicle. (This does not prohibit a police officer from using his or her firearm as a lethal force option when it is reasonable and necessary)."

Many agencies have adopted a complete prohibition on shooting at moving vehicles, starting with the New York City Police Department (NYPD) in the 1970s. Other agencies that prohibit shooting at vehicles include the Boston, Chicago, Cincinnati, Denver, Philadelphia, and Washington, DC Police Departments.[30] In New York City, the total number of shooting incidents involving NYPD officers declined 33 percent in the year following the implementation of the prohibition, and shootings continued to drop by more than 90 percent in the following years.[31]

However, PERF recognizes the recent trend of using motor vehicles as a weapon of mass destruction. This has been observed both internationally and within the United States. [32] PERF understands that this type of threat may require an extraordinary response to stop the threat and protect life. If this type of event were to occur within Atlanta, any use of force, particularly lethal force, must be evaluated based on all of the facts and circumstances and the necessary, reasonable, and proportional use of force.

APD should add language to its use-of-force policy regarding shooting at moving vehicles to state, "Shooting at or from a moving vehicle is prohibited, unless someone inside the vehicle is using or threatening lethal force against an officer or another person by means other than the

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30   Police Executive Research Forum (2016): *Guiding Principles on Use of Force.* Pages 44-47. https://www.policeforum.org/assets/30%20guiding%20principles.pdf

31   See PERF, *Guiding Principles on Use of Force,* pp. 45. http://www.policeforum.org/assets/guidingprinciples1.pdf

32   For example, in July 2016, a cargo truck was driven into a crowd in Nice, France. This attack resulted in the deaths of 86 people, and 458 people were injured. In the United States, a vehicle was used to attack a crowd in Charlottesville, VA in August 2017. One person was killed, and 19 others were injured. In October 2017, a vehicle was rammed through a crowded bike lane in New York City. Eight people were killed, and 12 were injured.

vehicle itself, or the vehicle is being used as a weapon of mass destruction in an apparent act of terrorism."

> **RECOMMENDATION: Prohibit shootings at or from vehicles in policy.** APD should add language to both its use-of-force policy and pursuit policy regarding shooting at moving vehicles to state, "Shooting at or from a moving vehicle is prohibited, unless someone inside the vehicle is using or threatening lethal force against an officer or another person by means other than the vehicle itself, or the vehicle is being used as a weapon of mass destruction in an apparent act of terrorism."
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

4.3.1 Medical Attention

Section 4.3.1 states that employees will request appropriate medical aid and/or assistance immediately to all persons inflicted with severe injuries, experiencing medical distress, or who are unconscious due to an employee's use of force. APD should add language to improve its policy, stating that officers shall promptly render first aid, to the best of their training, to individuals who are injured or complain of an injury after a use-of-force incident until an EMT arrives.

> **RECOMMENDATION: Require officers to render first aid after a force incident.** APD should add language to Section 4.3.1 to require that officers render first aid, to the best of their training, to individuals who are injured or complain of an injury after a use-of-force incident until an EMT arrives.
>
> *APD has adopted this recommendation for implementation.*

4.4.3 Lethal and Less-Lethal Weapons

Section 4.4.3 of SOP .3010 Use of force states that officers are required to receive training on certain devices on at least an annual basis. Language in SOP .3040 Weapons in Section 4.3.1 Oleoresin Capsicum (OC) Spray and Section 4.4 Expandable Baton says that refresher training will occur at least biennially. APD should review language in all relevant policies to ensure congruency in refresher training on its less lethal weapons.

> **RECOMMENDATION: Review language on retraining frequency.** APD should review language in both its use-of-force and its weapons policy to ensure that the frequency of retraining in less lethal weapons is the same in both policies.
>
> *APD has adopted this recommendation for implementation.*

4.5 Duty to Intercede

The duty to intervene is emphasized in PERF's Guiding Principles on Use of Force and in Module 7 of ICAT. Language in APD's Duty to Intercede section is strong. PERF recommends that APD move this section to Section 2.0 Policy to highlight the department's requirement as a key part of its overall use-of-force philosophy. APD should also add a non-retaliation requirement in this section, to prohibit retaliation, interference, intimidation, or coercion against employees who intervene or report inappropriate uses of force.

RECOMMENDATION: Integrate duty to intercede within the department's use-of-force philosophy. APD should move Section 4.5 Duty to Intercede to Section 2.0 Policy to highlight this requirement as a key component of the department's overall use-of-force philosophy.

APD has adopted this recommendation for implementation.

RECOMMENDATION: Add a non-retaliation requirement. APD should add a non-retaliation requirement in this section, to prohibit retaliation, interference, intimidation, or coercion against employees who intervene or report inappropriate uses of force.

APD has adopted this recommendation for implementation.

4.6.2 Reporting Requirements

Section 4.6.2 states that "Any employee who points or aims a firearm at a subject or applies force or takes an action that results in, or is alleged to have resulted in, the physical injury or death of another person is required to immediately notify his or her supervisor. An incident report describing the incident must be completed and submitted prior to the end of that employee's tour of duty."

APD should add language to section 4.6.2 that makes clear that supervisors are required to respond to the scene where an employee points or aims a firearm at a subject. While Section 4.7.1 appears to state this requirement, it would be clearer to add this language to Section 4.6.2.

RECOMMENDATION: Add language to section 4.6.2 that clearly states that a supervisor is required to respond to the scene when an employee points or aims a firearm at a suspect.

This recommendation remains under review by APD and has not been adopted at this time.

APD should require that the pointing or aiming of an Electronic Control Weapon is to be reported to a supervisor and included in an incident report.

> **RECOMMENDATION: Require the reporting of pointing or aiming ECWs.** APD should require that a supervisor be notified when an officer points or aims an ECW at a subject. This should also be captured in an incident report.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

Section 4.6.8 provides timelines for the review, approval, and routing of force incidents. Language in APD's current policy states that the section commander's review, approval, and routing through their chain of command must be done within seven days of receiving the report.

Current language is unclear as to how far up the supervisor's chain of command review goes. PERF recommends that the chain of command review go up to the deputy chief of the involved officer's division (typically Patrol). Language in this section should be added to reflect this requirement.

> **RECOMMENDATION: Use-of-force reports should ultimately be reviewed by a deputy chief.** APD should clarify language in Section 4.6.8 to state that the review of an officer's use-of-force go through their chain of command up to the level of that officer's deputy chief.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

4.7.3 Chain of Command Review

4.7.3 states that "The employee's supervisor will assist the officer as necessary and will investigate the employee's use of force." This requirement is sound, but language should be added to state that the supervisor will review the incident in its entirety, not just the moment when force was used. Supervisors should also receive training in how to conduct these investigations.

> **RECOMMENDATION: Holistic review of force incidents.** Supervisors should be taught to review each incident in its entirety and not just at the moment force was used. APD should ensure that supervisors receive training in how to conduct these investigations. Supervisors who are present or involved in the incident should not be the investigating supervisor.
>
> *APD has adopted this recommendation for implementation.*

New Section: Critical Incident Review Board

APD must continuously engage in a process of self-examination. When certain significant events occur, a detailed performance review should occur. APD should create an advisory body that reviews serious uses of force and other critical incidents. At the conclusion of its review, the advisory body makes a recommendation to the Police Commissioner regarding the completeness

of the investigations, findings, and action items.[33]

PERF recommends that this body be named the Critical Incident Review Board (CIRB). The CIRB should be led by a deputy chief, and tasked with a review/investigation of the following incidents:

- All serious uses of force (including canine bites)
- Lethal force
- Less-lethal force with a tool
- Uses of force resulting in death, serious physical injury, loss of consciousness, or requiring hospitalization
- All in-custody deaths
- Any other critical police incident as directed by the chief of police

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RECOMMENDATION: Create a Critical Incident Review Board: APD should create a Critical Incident Review Board (CIRB), led by a deputy chief, that is responsible for reviewing: all serious uses of force; lethal force; less-lethal force with a tool; uses of force resulting in death, serious physical injury, loss of consciousness, or requiring hospitalization; all in-custody deaths; and any other critical police incident as directed by the chief of police.

The formal review of these incidents, conducted as a matter of course, will provide valuable opportunities to identify lessons that can be incorporated into officer training, gaps in tactics, any need for additional equipment to be provided to officers, or any need for changes in policy.

In order to provide a decision in a timely manner, the CIRB should convene within 45 days of the completion of the final investigative report by the investigative unit, and the chair should submit a memorandum to the police chief outlining the findings and recommendations of the CIRB.

RECOMMENDATION: The CIRB should convene within 45 days of the completion of the final investigative report, and once the review is complete, the chair of the CIRB should submit a memo containing findings and recommendations to the chief.

In response to this recommendation, APD has drafted a policy to establish procedures for a Critical Incident Review Board (CIRB). The CIRB would review police incidents involving firearm discharges at persons and incidents involving police that result in a fatal injury. The CIRB would be charged with making recommendations for policy development, training, and officer safety and providing recommendations to the Chief. The policy is being revised and under review.

In addition, APD should have a process to provide an initial debrief to the chief within 72 hours following an officer-involved shooting or in-custody death to identify any immediate response or action. The chief should be briefed by investigators regarding the facts of the case known at

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33   One example of such a policy is Baltimore Police Department's Policy 724—Performance Review Board available at https://www.baltimorepolice.org/724-performance-review-board

that time, to determine whether any immediate changes to policy, training, or equipment are necessary. The 72-hour tactical debrief is not meant to replace a formal administrative investigation.

RECOMMENDATION: 72-hour tactical debrief. APD should require that a tactical debriefing occur no later than 72 hours after an officer-involved shooting or in-custody death, to identify potential issues in training, policy, and/or equipment without having to wait until the completion of the official shooting investigation. As part of this review, the training supervisor should be allowed access to the scene after all investigative measures have been completed. The 72-hour tactical debrief is not meant to replace a formal administrative investigation.

This recommendation remains under review by APD and has not been adopted at this time.

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7. Definitions

Definitions to add/modify:

RECOMMENDATION: Include ECWs as an example of less-lethal weapons. APD should add "Electronic Control Weapon (ECW)" to its list of examples under the definition of "less-lethal weapon."

This recommendation remains under review by APD and has not been adopted at this time.

RECOMMENDATION: Add a definition of "proportionality" in use of force: APD should add a definition of "proportionality" to the Definitions section of policy. As explained in PERF's report on Guiding Principles on Use of Force, the definition should state that proportionality involves officers: (1) using only the level of force necessary to mitigate the threat and safely achieve lawful objectives; (2) considering, if appropriate, alternate force options that are less likely to result in injury but will allow officers to achieve lawful objectives; and (3) considering the appropriateness of officers' actions. The concept of proportionality does not mean that officers, at the moment they have determined that a particular use of force is necessary and appropriate to mitigate a threat, should stop and consider how their actions will be viewed by others. Rather, officers should begin considering what might be appropriate and proportional as they approach an incident, and they should keep this consideration in their minds as they are assessing the situation and deciding how to respond. Proportionality also considers the nature and severity of the underlying events. Proportionality is a central component of the Critical Decision-Making Model (CDM), discussed earlier in this report, and should be adopted by APD to guide officers' actions.

This recommendation remains under review by APD and has not been adopted at this time.

RECOMMENDATION: Add a definition of "de-escalation" to policy. APD should add a definition of "De-escalation" to its definitions section. Current policy refers to de-escalation in several sections, so this term should be clearly defined in policy.

For example, the Seattle Police Department utilizes the following definition of de-escalation: "taking action to stabilize the situation and reduce the immediacy of the threat so that more time, options, and resources are available to resolve the situation. The goal of de-escalation is to gain the voluntary compliance of subjects, when feasible, and thereby reduce or eliminate the necessity to use physical force."

APD has adopted this recommendation for implementation.

SOP .3030 Arrest Procedures

SOP .3030 establishes policy and procedure for the arrest, temporary detention, transport, and delivery of persons subject to arrest.

PERF has no recommended changes to policy. Section 4.1.3 Arrests in First Amendment Situations in particular provides good guidance to officers with regard to First Amendment activities.

SOP .3040 Weapons

SOP .3040 Weapons is APD's policy governing the use of weapons by officers.

APD should consider reviewing this policy to identify opportunities to streamline it. Specifically, APD should review policy to ensure that language relevant to maintenance of weapons and training is contained in its weapons policy, while language governing the use of force is moved to the department's use-of-force policy.

For example, Section 4.3.3 of APD's weapons policy contains a discussion of OC spray. Much of this language governs the practical *use* of OC spray (e.g., prohibition on using in a department vehicle, decontamination, etc.) and should be contained in APD's use-of-force policy.

Similarly, Section 4.14 of policy states that personnel should refer to SOP .3042 Conducted Energy Weapon for policies and procedures in the use, reporting, and maintenance of these devices. APD should integrate any language in SOP .3042 that involves the maintenance and care of these devices into Section 4.14.

RECOMMENDATION: Streamline policy. APD should include language governing the use and operation of force tools (e.g., baton, OC spray) to its use-of-force policy, while keeping language relevant to maintenance and training of these devices in its current Weapons policy to ensure consistency between these policies.

This recommendation remains under review by APD and has not been adopted at this time.

4.1.5 Weapon Mounted Lights

APD should add language to this section that clearly prohibits using a weapon-mounted light system as a general source of illumination (e.g., using it as a flashlight). Using a weapon light as a general source of illumination brings the weapon into play when it is not needed.

> **RECOMMENDATION: Prohibit the use of weapon-mounted lights as a source of illumination.** APD should add language to Section 4.1.5 to clearly prohibit the use of weapon-mounted lights as a general source of illumination.
>
> *APD has adopted this recommendation for implementation.*

SOP .3042 Conducted Energy Weapon

SOP .0342 governs the use of the department's Conducted Energy Weapons (e.g., Taser). APD should replace all references to "conducted energy weapons" in its policies with the term, "Electronic Control Weapon (ECW)," as this is the preferred reference in the field to this type of device.

> **RECOMMENDATION: Use the term "Electronic Control Weapon."** APD should replace all references to "conducted energy weapons" in its policies with the term, "Electronic Control Weapon (ECW)," as this is the preferred reference in the field to this type of device.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

2. Policy

Section 2 contains the department's policy statement on ECWs. APD should add language on the department's overall use-of-force philosophy in this section (such as the importance of proportionality and de-escalation), or refer officers back to the department's use-of-force philosophy as contained in SOP .3010 Use-of-force.

> **RECOMMENDATION:** Reinforce APD's use-of-force philosophy. APD should either add language to Section 2 Policy to include the department's overall use-of-force philosophy, or refer officers to the department's philosophy as contained in SOP .3010 Use-of-force.
>
> *APD has adopted this recommendation for implementation.*

4.1.7 Settings

This section states that probe mode is the primary setting for ECWs, with the drive stun mode as a secondary option. APD should include language to this section to prohibit the use of the

drive stun mode as a pain compliance technique. The drive stun mode should be used only to supplement the probe mode to complete the incapacitation circuit, or as a countermeasure to gain separation between officers and the subject so that officers can consider another force option.

> **RECOMMENDATION: Prohibit use of the ECW as a pain compliance technique.** APD policy should forbid the use of the drive stun mode (where the ECW is applied directly against the subject without firing darts) as a pain compliance technique. The drive stun mode should be used only to supplement the probe mode to complete the incapacitation circuit, or as a countermeasure to gain separation between officers and the subject, so that officers can consider another force option.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

4.2.2 Decision to Deploy

Current language in this section states that "an officer's decision to deploy the CEW shall involve a physical arrest or a situation where the subject is escalating from passive resistance to active resistance." This section should be changed to state that an officer's decision to deploy an Electronic Control Weapon shall involve a physical arrest or a situation where the subject has escalated from passive resistance to active resistance.

> **RECOMMENDATION:** Section 4.2.2 should be revised to state an officer's decision to deploy the CEW shall involve a physical arrest or a situation **where the subject has escalated** from passive resistance to active resistance.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

4.2.4 Environmental Factors

Current language in this section states that "Environmental factors which could lead to serious injury or death shall be taken into consideration." APD should expand this section to provide more guidance to officers by providing examples such as using the ECW on a subject in an elevated position who may suffer serious injury or death as a result of a fall, etc.

> **RECOMMENDATION: Provide examples of environmental factors.** APD should provide examples of environmental risk factors in Section 4.2.3., such as using an ECW on a subject in an elevated position who may suffer serious injury or death as a result of a fall, etc.
>
> *APD has adopted this recommendation for implementation.*

4.4.3 Targeting to ECW

Section 4.4.3 contains information on where to target the ECW on a subject. The last sentence in this section states that "No subject will be exposed to an ECW deployment for any longer than fifteen (15) seconds."

This prohibition is sound; however, it should be **moved to Section 4.4.4,** which discusses deployment cycles, so that it appears after the following sentence: "When deploying the ECW, the officer shall activate it for one cycle (one trigger pull – 5 seconds), then stop and evaluate the situation. Additional ECW discharges can be administered when reasonable and necessary to gain 'control' of the subject, if the initial 5 seconds deployment was ineffective. The CEW should be deployed in conjunction with verbal commands."

> **RECOMMENDATION: Move language on 15-second deployment.** APD should move language in Section 4.4.3 to Section 4.4.4 which discusses deployment cycles. T**he new language should read** "When deploying the ECW, the officer shall activate it for one cycle (one trigger pull – 5 seconds), then stop and evaluate the situation. Additional ECW discharges can be administered when reasonable and necessary to gain 'control' of the subject, if the initial 5 seconds deployment was ineffective. The ECW should be deployed in conjunction with verbal commands. No subject will be exposed to an ECW deployment for any longer than fifteen (15) seconds."
>
> *APD has adopted this recommendation for implementation.*

4.4.4 Deployment of ECW—Communication

This section discusses deployment cycles and states that "The ECW should be deployed in conjunction with verbal commands." APD can strengthen communication requirements by adding language to this section requiring that a warning should be given to a subject prior to activating the ECW, unless doing so would place any person at risk.

> **RECOMMENDATION: Warning to subjects.** A warning should be given to a subject prior to activating the ECW, unless doing so would place any person at risk. Warnings may be in the form of verbalization, display, laser painting, arcing, or a combination of these tactics.
>
> *APD has adopted this recommendation for implementation.*

Additionally, APD should add language to this section requiring that the deploying officer warn other officers on scene that an ECW will be deployed.

> **RECOMMENDATION: Warning to officers.** When feasible, an announcement should be made to other personnel on the scene that an ECW is going to be activated.
>
> *APD has adopted this recommendation for implementation.*

4.4.10 Moving Vehicles

Policy states that ECWs are not to be deployed against a subject in control of a motor vehicle. APD can provide additional guidance to officers by replacing current language in Section 4.4.10 with the language below.

> **RECOMMENDATION: Adopt a more comprehensive prohibition of ECW use on subjects in control of a vehicle.** APD should replace current language in Section 4.4.10 Moving Vehicles with "ECWs should not be used against subjects in physical control of a vehicle in motion (e.g., automobiles, trucks, motorcycles, ATVs, bicycles, scooters)."
>
> *APD has adopted this recommendation for implementation.*

4.6 Medical Treatment

This section addresses medical treatment to those who have been subjected to an ECW application. Overall language is sound, but APD can strengthen the policy by adding the following language to this section.

> **RECOMMENDATION: Risk of Sudden Death.** Policy should state that officers should be aware that there is a higher risk of sudden death when an ECW is used against subjects under the influence of drugs and/or exhibiting symptoms associated with excited delirium.
>
> *APD has adopted this recommendation for implementation.*

SOP .3082 Mentally Ill

SOP .3082 provides guidance to officers when interacting with persons experiencing a mental health crisis.

General

APD should rename this policy "Responding to Persons Experiencing a Mental Health Crisis." This is the preferred term and is the title of IACP's model policy. References to persons experiencing a mental health crisis as "mentally ill" are outdated.

RECOMMENDATION: Rename policy. APD should rename SOP .3082 Mentally Ill "Responding to Persons Experiencing a Mental Health Crisis." APD's current terminology is outdated.

APD has adopted this recommendation for implementation.

2. Policy

APD should reference ICAT and the Critical Decision-Making Model (CDM) (discussed previously in this report) in this section. ICAT and the CDM can provide officers with guidance in communicating with those in crisis, providing tools to help de-escalate situations.

RECOMMENDATION: Reference ICAT and the CDM in policy. APD should make reference to ICAT and the CDM in Section 2 Policy, to provide officers with additional resources to use in their interactions with those who may be experiencing a mental health crisis.

APD has adopted this recommendation for implementation.

4.4 Guidelines for Dealing with the Mentally Ill

This section provides officers with guidelines for responding to persons who are experiencing a mental health crisis. APD should consider modifying the term "Guidelines for Dealing with the Mentally Ill" in order to promote officers' understanding of the importance of helping someone in crisis, as opposed to "dealing" with them, which has a negative connotation.

Additionally, there are situations where the subject is exhibiting signs of mental illness, but may not have a mentally illness, such as a subject under the influence of drugs or alcohol, a medical crisis that appears to be mental illness, and situational crises. The term "Guidelines for Managing Those in Crisis" is more encompassing.

RECOMMENDATION: Replace the term "Guidelines for Dealing with the Mentally Ill." APD should replace the term "Guidelines for Dealing with the Mentally Ill" with "Guidelines for Managing Those in Crisis" to promote officers' understanding of the importance of helping to manage someone in crisis, as opposed to "dealing" with them, which has a negative connotation, and also does not address situations where a subject *appears* to be exhibiting signs of mental illness, but may not actually have a mental illness (such as persons under the influence of drugs).

APD has adopted this recommendation for implementation.

SOP .3089 Supervisor Notification

SOP .3089 addresses situations in which a supervisor's presence or notification is required.

Section 4.2 lists 20 situations in which supervisor response is required. Currently, supervisors are required to respond when any officer uses any force outlined in APD's use-of-force policy. Similar to PERF's recommendation in our review of APD's use-of-force policy, APD should add language requiring that supervisors be dispatched to all incidents where it is anticipated that force might be used.

At PERF's 2016 meeting on *Guiding Principles on Use of Force,* former San Diego Police Chief William Lansdowne said that in incidents that involved an officer-involved shooting, there was typically about a 15-minute window from when the call came in until the first shots were fired. "If you have a system set up within your organization that gets a supervisor to the scene early on, within the 15-minute window, your chance of having an officer-involved shooting … is reduced by about 80 percent, because they can manage the situation as a team," Chief Lansdowne said.[34]

Therefore, PERF recommends that supervisors be aware of the types of incidents that can result in force being used—such as calls involving persons in crisis or persons with a developmental disability, drug addiction, or other condition that is causing them to behave erratically or dangerously—and to respond to those calls.

> **RECOMMENDATION: Dispatching supervisors to potential use-of-force incidents.** APD should add language to Section 4.2 to require that supervisors should be dispatched to all incidents where it is anticipated that force might be used.
>
> *This recommendation remains under review by APD and has not been adopted at this time.*

SOP .3180 Critical Incidents

SOP .3180 governs APD's response to critical incidents.

Section 2 of SOP .3180 contains the department's policy statement regarding critical incidents. APD should add language on the department's overall use-of-force philosophy to this section (such as the importance of proportionality and de-escalation) or refer officers back to the department's use-of-force philosophy as contained in SOP .3010 Use of Force.

> **RECOMMENDATION: Reinforce APD's use-of-force philosophy.** APD should either add language to Section 2 Policy to include the department's overall use-of-force philosophy, or refer officers to the department's philosophy as contained in SOP .3010 Use of Force.
>
> *APD has adopted this recommendation for implementation.*

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34   Police Executive Research Forum, *Guiding Principles on Use of Force,* (Washington, D.C.: Police Executive Research Forum): p. 63.

New Practice to be Utilized During Roll Call: Review of Critical Incidents

APD should create a new practice that requires its first-line supervisors to regularly look for departmental and nationally trending incidents involving use of force and other critical incidents by police, especially incidents where there is video footage that can be used as a basis for discussion and education of officers. PERF has written several articles that explain and recommend this practice.[35] APD's first-line supervisors should share these videos with their officers to foster general discussions of decision-making and incident outcomes. Regardless of the jurisdiction the incident occurred in, supervisors can use these videos and ask their officers questions such as:

- Was this use of force in line with APD's use-of-force policy?
- Do the actions of the officer(s) in the video reflect the mission, vision, and values of APD?
- If this incident occurred in Atlanta, how would our community react?
- What did the officer(s) do well in the encounter?
- Were there things that the officer(s) in the video could have done better?

The purpose of these reviews is not to second-guess the actions of the involved officers but, rather, to generate a discussion. The Critical Decision-Making Model (CDM) is the perfect tool to utilize for these discussions and will help solidify the use of the CDM as part of officers' everyday decision-making process.

Videos need not be negative in nature. Instances where officers successfully resolve incidents should also be shared with officers.

RECOMMENDATION: Review footage of national uses of force on an ongoing basis.
APD should require that first-line supervisors regularly look for video footage of use of force and critical incidents (such as from news reports or officers' body-worn camera footage) to share with their officers. Supervisors should generate a discussion of what took place in the video, to include what officers did well, what they could have done better, and if the incident in question was reflective of APD's mission, vision, and values. The Critical Decision-Making Model can serve as a foundation for these discussions.

APD has adopted this recommendation for implementation.

Monitoring Use-of-Force Trends

PERF interviewed APD personnel to obtain an understanding of how uses of force are reported and reviewed. If an officer uses force, he/she is required to complete a use-of-force form (Form 17), and the supervisor will interview all parties involved and complete a use-of-force supplement. The use-of-force form and supplement are then reviewed by the officer's chain of command and signed off by the sergeant, lieutenant, captain, and major. Prior to January 2021, this process was done entirely on paper and the major was responsible for sending a paper copy of the form and supplement to the Training Section and Central Records and referring to the Office

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35   See "PERF Trending: How Do We Get Out of This Mess? Here's a First Step." August 29, 2020.
https://www.policeforum.org/trendingaugust29; "PERF Trending: PERF members tell me they agree that policing needs 'Monday-morning quarterbacking.' " September 5, 2020. https://www.policeforum.org/trendingsep5; "PERF Trending: The Next Step in Monday-Morning Quarterbacking." September 12, 2020. https://www.policeforum.org/trendingsep12

of Professional Standards (OPS) if warranted.

Until 2021, the Training Section, OPS, and Central Records all had separate systems to track and collect use-of-force data, which led to data discrepancies when compiling the annual report. (Data and reporting issues are discussed in the next section of this report.) Another downside to the paper system is that it could take weeks or months for use-of-force reports to get to the Training Section for review and action.

APD has been working with AXON to design and implement a new use-of-force reporting and data collection system that will ensure that all relevant individuals have access to use-of-force information simultaneously. AXON has never before created a use-of-force data collection system and is working with APD on this pilot project. This system went live on January 1, 2021, and serves as a clearinghouse for all use-of-force data. All use-of-force supplements are entered into the database, and the Training Section and OPS have immediate access. The incident report, supplement, and body-worn camera video are all reviewed by the Training Section. Once reviewed, Training Section staff complete an online Training Implication Form to document if there is there a policy violation, if there is a training opportunity, and if remedial training is needed. If there is a significant breach of policy, Training will forward to OPS and the officer's supervisor for investigation.

> **The purpose of using these actual cases is not to critique the actions of the officers involved, but instead to develop realistic scenario-based training that reflects the types of incidents that officers encounter in Atlanta.**

With the Training Section fully involved in the process of monitoring the department's use-of-force, it will also be able to create training curricula derived from actual cases. The purpose of using these actual cases is not to critique the actions of the officers involved, but instead to develop realistic scenario-based training that reflects the types of incidents that officers encounter in Atlanta.

APD reports that the AXON system has improved and streamlined its use-of-force reporting, review, and monitoring. However, this software is still under development and needs improvement. Additionally, it does not interface with IAPro. This means that unless a use-of-force incident results in a complaint, it does not get entered into IAPro's Early Warning alert system. PERF recommends that APD continue to work to improve its use-of-force software and to investigate other technology products. If the AXON prototype does not meet APD's needs and does not interface with IAPro, APD should consider a different software solution to track uses of force.

RECOMMENDATION: PERF recommends that APD continue to research and identify a use-of-force tracking software solution that provides the features and integrations it needs. IAPro and Benchmark Analytics are examples of systems used by a number of other departments.

APD personnel reported that there is a need for supervisor training on how to use the newly developed software system and that some supervisors are not reviewing body-worn camera footage as part of their investigation.

RECOMMENDATION: PERF recommends that APD develop and implement a training for sergeants on how to use the new use-of-force software platform.

RECOMMENDATION: PERF recommends that APD policy be updated to clarify exactly which supervisors are required to review body-worn camera footage as part of the use-of-force review process.

Section IV. Use-Of-Force Data Review

To access the Atlanta Police Department's (APD) reporting on use of force, PERF evaluated use-of-force data from the 2019[36] and 2020[37] annual reports and raw use-of-force data for each year. The raw data consisted of a total of 753 use-of-force reports associated with 733 distinct incidents. PERF examined the raw data and the corresponding annual reports to better understand how APD collects and reports its UOF data and to identify potential areas of improvement in data collection and reporting. The PERF team also obtained the 2018 Use of Force report from APD.[38] However, because no Excel data exist to corroborate the 2018 annual report, this was excluded from the main analysis.

PERF found that APD collects a significant amount of data about use of force and provides analysis and public reporting of most of this data. APD can improve its use-of-force reporting by ensuring data consistency between sources including the underlying raw Excel data, the annual report, and the use-of-force dashboard. It can also make enhancement to the annual report by adding some data elements and making changes to the report layout and structure.

Reporting Requirements

Section 4.6 of the APD's Standard Operating Procedure on Use of Force (APD.SOP.3010)[39] outlines the department's reporting requirements for a use-of-force event. The policy states that any officer who uses or applies force within the conditions found in section 4.6.1 through 4.6.7 is required to immediately contact or notify their supervisor or an on-duty supervisor if the event took place outside their assigned zone.[40]

These conditions include the following situations:
- when an officer points a firearm at a subject or uses force that results in, or is alleged to have resulted in, an injury or death of another person;
- when an officer applies force through lethal or less-lethal weapons;
- when an officer uses weaponless control techniques that are likely to result in injury, claim of injury, allegation of excessive force, or death;
- when force is used against property and results in damage; when an officer uses force in a law enforcement capacity off-duty; and
- when an officer works an extra job and uses force.[41]

A completed incident report describing the event must be submitted by the officer(s) involved prior to the end of the officer's tour of duty. The supervisor in turn is required to complete a use-of-force report through the RMS incident and Axon Standards Use-of-Force Module and is routed to the supervisor's supervisor, the training academy, and OPS by the end of the occur-

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36   2019 Use of Force Report. https://www.atlantapd.org/home/showdocument?id=4234

37   2020 Use of Force Report. https://www.atlantapd.org/Home/ShowDocument?id=3823

38   2018 Use of Force Annual Report. https://www.atlantapd.org/home/showdocument?id=4240

39   Atlanta Police Department Policy Manual. APD.SOP.3010, Use of Force. April 26, 2021.
https://www.atlantapd.org/home/showpublisheddocument/4710/637840613783500000

40   Ibid., pg. 5.

41   Ibid.

ring shift.[42] The module is then forwarded through the respective chain of command up to the section commander for review.[43]

APD's training section conducts the annual analysis of all of the use-of-force reports completed by the supervisor. The annual report serves to identify patterns or trends in the use of force and determine training needs of officers and adherence to policy and procedure.[44] The raw data on use of force is created based on the information gathered in the use-of-force reports. It is entered manually into an Excel spreadsheet by academy personnel.

Data That APD Collects and Reports

General use-of-force data that APD compiles annually includes the following information:
- A use-of-force event occurred
- Incident date
- Where and when the event took place (including watch and zone)
- Use-of-force trends
- Officer and suspect demographics, including race, gender, age, officer rank, and officer years of service
- Call for service reason
- Existence of any video and source (Electronic Control Weapon, body-worn camera, or both)
- Officer and suspect injuries

APD also collects information on the method of force used in an incident. There are five main methods of force that the APD documents: physical force; firearms; OC or pepper spray; ASP batons; and Electronic Control Weapon (ECW).

APD reports the total number of use-of-force incidents that resulted in a citizen complaint against an officer for unnecessary use of force or maltreatment when a firearm was involved. The data in this section describes the officer and suspect involved, the time and location of the event, and type of complaint. The complaints also describe the allegation made against the officer and the disposition or status of the case. The 2020 report includes suspect and officer demographics (race and gender) and injury data.[45] This data was not reported in the 2019 report.[46]

Remedial training is provided to officers who use force in conditions that could present an undue hazard to the suspect, such as using an Electronic Control Weapon in the rain or on uneven terrain.[47] Both annual reports provide information on the total number of officers who received this training based on the method of force used. Although all methods of force are accounted for, the report places particular focus on cases where an ECW was used. The reason for this is the increase in use of ECWs since their introduction in 2013 and the fact that ECWs are the

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42 Ibid.

43 Ibid., pg. 6

44 2020 Use of Force Report, p. 2. https://www.atlantapd.org/Home/ShowDocument?id=3823

45 Ibid., pp 8-10.

46 2019 Use of Force Report, pg. 8. https://www.atlantapd.org/home/showdocument?id=4234

47 Ibid., p. 6.

most often used non-physical weapon.[48]

The underlying data in the Excel file contains a total of 373 use-of-force reports associated with 366 unique incidents (more than one officer can be involved in the same event) in 2019, and a total of 380 reports associated with 373 unique incidents in 2020, matching the total use-of-force cases in their respective annual reports. The data also provides additional detail on use-of-force incidents. Additional data points include the entry date; the magnitude of the injuries to officers and suspects; the type of ECW used; the number of officers and suspects at the scene; whether the force eased arrest; firearm round fired; and whether the physical force had implications for policy, training, or equipment needs.

For the purpose of our analysis, PERF extracted the month from the entry date, added columns to capture cases where multiple use-of-force methods were used, and created intervals from the officer age and years of service.

APD Use-of-Force Reporting Discussion

The following sections provide a detailed discussion of PERF's findings from all identified sources of APD use-of-force data. The first section discusses the most significant findings within the use-of-force analysis. This section focuses solely on what the data says, rather than issues about how the data is reported and analyzed. The second section focuses on computation and reporting in the annual use-of-force analyses.

Use-of-Force Findings

The PERF team identified three primary use-of-force findings:
1. While use of hand was the primary method of force applied, officers frequently use the ECW in use-of-force incidents and rarely utilize other less-lethal weapons.
2. Force is being used mostly by younger officers (21 to 30 years old) and by less experienced officers (1 to 5 years of service) in the department.
3. APD officers used force more frequently against African American suspects than other racial groups.

These findings are discussed in greater detail below.

Use of ECW

While use of hands was the most prevalent type of force applied by APD officers, PERF's analysis found that the most frequently used tool or weapon in a use-of-force incident was the ECW. The breakdown of the use-of-force methods is depicted below.

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48   2019 Use of Force Report, pp. 5-6. https://www.atlantapd.org/home/showdocument?id=4234

TABLE 4.1

Use-of-Force Methods in 2019 and 2020

Type of Force	2019	2020
Physical	232	201
O.C.	19	22
ASP Baton	14	2
Firearm	10	19
Taser	98	136
Total Reports	**373**	**380**

Based on the findings, officers are not fully utilizing the other methods available to maintain control in situations that require force. In addition, ECW's can be unreliable and fail to deploy. PERF recommends that the APD gather information from officers to determine the reason that ECW is used at a much higher frequency than other tools or weapons.

> **RECOMMENDATION: Gather information on high levels of ECW use and utilize the Critical Decision-Making Model (CDM) in considering other options.** The data shows that officers frequently use the ECW in use-of-force incidents and rarely utilize other less-lethal weapons like OC spray. It would be beneficial to speak with officers in the field to determine why this is so and to instruct officers to utilize the Critical Decision-Making Model to examine other options in use-of-force situations. APD should integrate this into the upcoming ICAT in-service training.

Officers' Years of Service and Use of Force

Data found within the annual reports indicate that force is being used mostly by officers with the least amount of experience and training. In 2019, officers with 5 or less years of experience accounted for 58.16% of the total 337 use-of-force incidents that year. In 2020, this same group accounted for 34.74% of the total 380 use-of-force incidents that year. Because of some irregularities in the 2020 data, only the 2019 data are charted on the next page.

PERF's prior work has shown that officers with more education, experience, and who are older tend to use less force.[49] Interviews and observations conducted as part of this review found

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49 Police Executive Research Forum (February 2021). *What Police Chiefs and Sheriffs Need to Know About Collecting and Analyzing Use-of-Force Data.* https://www.policeforum.org/assets/CollectingAnalyzingUOFData.pdf

younger officers with less experience are frequently assigned to patrol and have more encounters with the public. PERF recommends that APD monitor the frequency of use-of-force by younger officers and consider offering additional training to them. This should be part of APD's Early Intervention System. Currently, APD's Early Intervention System does not include all uses of force, only uses of force where a complaint was made. Including all uses of force in the Early Intervention System could identify officers who would benefit from additional training.

> **RECOMMENDATION: Monitor use of force by less experienced officers, and mentor and train those officers on how to continually improve their response to situations that may result in a use of force.** APD should monitor all uses of force as part of its Early Intervention System, for the purpose of improving de-escalation and other training and identifying officers who would benefit from additional training and supervision. First-line supervisors play a critical role in mentoring younger and less experienced officers on how best to achieve successful outcomes in force situations.

FIGURE 4.1

Use of Force by Years of Service: 2019

- 21-30 years: 2.1%
- 11-20 years: 14.5%
- 6-10 years: 25.2%
- 1-5 years: 58.2%
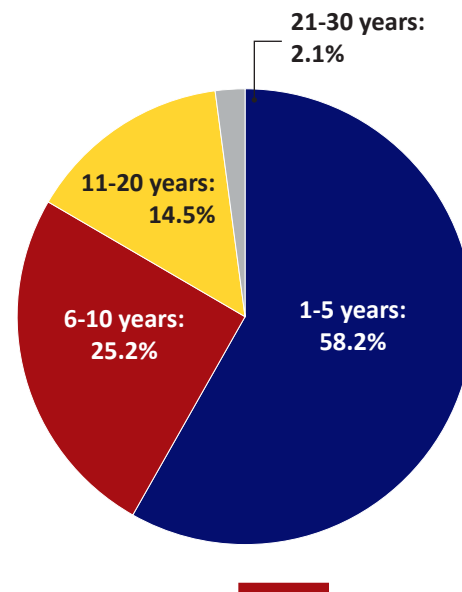
Race of Suspects

According to 2020 Census data, the racial composition of the City of Atlanta is as follows:
- 40.9% white
- 51% Black or African American
- 0.3% American Indian and Alaska Native
- 4.4% Asian
- 2.4% two or more races

In terms of ethnicity, 4.3% identified as Hispanic or Latino.

PERF's analysis found that APD officers used force more frequently against Black suspects than other racial groups in the report. According to the APD reports, officers used force against Black suspects 333 times in 2019[50] and 336 times in 2020.[51] Officers used force against white suspects 41 times in 2019[52] and 30 times in 2020.[53]

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50 2019 Use-of-force, Annual Report, pg. 13. https://www.atlantapd.org/home/showdocument?id=4234

51 2020 Use-of-force, Annual Report, pg. 14. https://www.atlantapd.org/Home/ShowDocument?id=3823

52 2019 Use-of-force, Annual Report, pg. 13. https://www.atlantapd.org/home/showdocument?id=4234

53 2020 Use-of-force, Annual Report, pg. 14. https://www.atlantapd.org/Home/ShowDocument?id=3823

To determine whether this numerical differential reflects racial bias would require complex research far beyond the scope of PERF's project. Multiple factors could be involved, such as whether policing activity is more concentrated in certain geographic areas, resulting in larger numbers of arrests that might result a use of force. Additionally, it would be helpful to understand the circumstances under which different types and levels of force are being used, whether certain squads or individuals are using force more than others, and the age and experience level of the officers broken down by race.

RECOMMENDATION: Conduct more in-depth analysis regarding use of force by race. The amount of data available is not enough to make a reasonable interpretation about reasons behind the amount of force used by race. PERF recommends that the APD arrange for a more in-depth analysis of use of force by race (and other analyses) by using proper comparison data. This data should include race of individuals in contact with the police, the circumstances under which force is being used, if there are certain geographic zones where force is used more often, if certain squads or individuals are using force more than others, the age and experience level of the officers using various types of force, broken down by race, and other pertinent factors.

Analysis and Reporting

PERF reviewed APD's annual reports and underlying data and found several issues related to how APD reports its use-of-force statistics. The following section will discussion these findings in detail and provide recommendations for improvement.

APD's Training Section is responsible for manually entering use-of-force data into Excel spreadsheets, conducting the department's analysis, and writing the annual reports. Manual data entry can increase the likelihood of errors in the data. As discussed above, APD has been working with AXON to create a technology solution that will collect use-of-force data. This potential solution remains a work in progress.

PERF recommends that the use-of-force data analysis and drafting of the annual report be performed by the Crime Analysis Section, rather than the Training Section. PERF also recommends that APD continue to invest in and develop technology that allows for data to be transferred from the use-of-force reports to a database that will store this data. PERF also recommends that an internal use-of-force report be created quarterly so that department leaders can assess the data for trends or training needs. These changes will better ensure data accuracy and consistency in how the data is reported across all channels.

RECOMMENDATION: PERF recommends that the use-of-force data analysis be performed by the Crime Analysis Section and that this same section draft the annual report.

APD has made this change, and all use-of-force data analysis for 2021 is being performed by the Crime Analysis Section.

> **RECOMMENDATION:** PERF recommends that APD continue to invest in and develop technology that allows for data to be transferred from the use-of-force reports to a database that will store this data, in order to improve data integrity and accuracy.

> **RECOMMENDATION:** PERF recommends that a quarterly internal use-of-force report be generated so that department leaders can assess the data for trends or training needs.
>
> ***APD is currently working with the Mayor's Office to upload use-of-force data quarterly to its newly created dashboard.***

Data Inconsistencies

PERF found some noticeable data inconsistencies between the print reports and the Excel data. In some instances, the APD captures data elements in one report that do not match the data elements in another report within the same data category. In other cases, the data in the Excel sheet cannot be reconciled with the data found in the annual reports.

For example, call-for-service data elements such as damage to property, indecent exposure, and escape or fleeing person were reported in 2019, but not in 2020. In 2020, carjacking, domestic disturbance, suicidal call, information for officer, intoxicated person, and injured person were captured, but these elements were not documented in 2019. This was the case in both the print reports and the Excel data.

There were also instances where data in one report was not captured at all in another. For example, in 2020 the APD reported the total number of use-of-force incidents by division as well as zone. However, the division data was not captured in the 2019 report.

> **RECOMMENDATION: Maintain consistent reporting of data categories.** APD should report the same use-of-force data categories and data elements within those categories for every reporting year. If changes need to be made, they must be documented within the report.

PERF also found issues with data labeling. Returning to the call-for-service type, the labeling was not consistent between reports. In this instance, the categories of an armed person or person injured by gunfire were consolidated into one category in 2019, but then split into two categories in the 2020 report. In 2019, a category is labeled as "armed person/person shot," whereas in 2020, one category was "person shot/shots fired" and another was "armed person call."

PERF also found a minor issue in how race is captured in the Excel data compared to how it was reported in the annual reports. The options for the race of officer in both print reports are Black, white, Hispanic, or other. In the Excel data, those racial categories are present in addition to "Asian." Upon further review of the Excel data, we found that there were 10 use-of-force inci-

dents in each report (20 in total) report involving Asian officers. However, it would appear that these Asian officers were classified as "other" in the print reports.

> **RECOMMENDATION: Ensure that data labeling is consistent.** The ways in which data is labeled in the annual report should match the raw data source *and* be consistent across all annual reports. If changes are made in order to improve the department's data analysis, the changes should be explained in the reports. With respect to race, Asian as a racial category should be present as an option in all forms of reporting use-of-force data and not listed as "other."

Data Accuracy

PERF also reviewed APD's use-of-force dashboard, which includes data from 2019 and 2020. PERF found discrepancies between the three use-of-force data sources—Excel data, annual reports, and the dashboard. For example, in the use-of-force dashboard, there were a total of 288 incidents in 2019 and 213 in 2020.[54] However, in the annual report, there were a total of 373 incidents in 2019 and 380 in 2020. There were additional data discrepancies, including officer and suspect demographics, use-of-force methods, and watch type.

PERF also discovered discrepancies between the underlying data contained in Excel files and the annual reports. For example, in the 2019 annual report, officers within the age range of 31-40 had the most uses of force.[55] However, the Excel data shows that use-of-force was greater for officers within the age range of 21-30 years. There were also differences in the number use-of-force incidents found within officer age data category. The below table shows the comparison.

TABLE 4.2

Discrepancies in Data: Excel vs. Annual Report

Officer Age	Use-of-Force Totals Excel Data (2019)	Use-of-Force Totals Annual Report (2019)
21-30	179	154
31-40	149	163
41-50	32	44
51-60	6	8

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54   "Use-of-force dashboard." City of Atlanta. https://justicereform.atlantaga.gov/use-of-force

55   2019 Use-of-force, Annual Report, pg. 11. https://www.atlantapd.org/home/showdocument?id=4234

> **RECOMMENDATION:** **Ensure that data is the same in all areas of reporting.** The APD needs to ensure that the use-of-force data and analysis being generated are the same across all reporting formats. When significant differences are found across reporting formats, the discrepancies need to be corrected to ensure consistency.

Use of Force Against Property

APD collects data and reports use of force against property, such as breaking down a door. PERF recommends that APD discontinue its practice of reporting force used against property. First, it diminishes the sanctity of human life to include property damage in the same data collection system, and second, including property damage incorrectly increases the number of "use-of-force" incidents being reported. This results in confusion and skewed use-of-force data.

As an alternative, PERF recommends that APD report *property damage* that occurs during a use-of-force incident and maintain this as a separate category of data. If an officer uses force to gain entry into a building or car, it should be considered an element of property damage that occurred during a use-of-force event. If an officer did not use force against a person during an arrest, but property is damaged to execute that arrest, that should not be counted as a use-of-force event.

> **RECOMMENDATION:** **Do not report "force used against property."** The annual report should delete the option of "force used against property" from the "force used" data category in Excel. Instead, property damage that occurred during a use-of-force incident should be documented as a separate data field.

Report Layout and Structure

None of the annual reports contains a table of contents explaining where findings or different sections in the report are located. Instead, the reports start with excerpts taken from the APD. SOP.3010,[56] followed by an explanation of the type of analysis the department conducts based on the use-of-force reporting standards found within the Commission on Accreditation for Law Enforcement Agencies (CALEA) Manual for Law Enforcement Standards.[57] Use-of-force reports should contain a table of contents to guide readers on where different sections are located.

> **RECOMMENDATION: Provide a table of contents.** Annual use-of-force reports should contain a table of contents to help guide reader in locating data findings and sections within the report. The annual reports currently provide an executive summary followed by the main analysis with visualizations. The problem is that the executive summary is very short and only describes the total number of arrests, total number of use-of-force reports, total use-of-force reports by method, and the percentage change from the previous year. It does not provide an overview of other data significant findings within the report.

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56   Atlanta Police Department. 2021. "Use-of-force" Atlanta Police Department Policy Manual, April 26, 2021. https://www.atlantapd.org/home/showpublisheddocument/4710/637840613783500000

57   2019 Use-of-force, Annual Report, pp 3-4. https://www.atlantapd.org/home/showdocument?id=4234

RECOMMENDATION: **Expand the executive summary.** The executive summary for the annual report should be expanded and contain an overview of *all* of the findings in the annual report. Shifting focus to the main analysis, most of the reports contain only the visualizations of the findings with little or no description to explain the findings. The exceptions for this are the remedial training and complaints data. In addition, the visualizations are separated throughout the report only by their headers. This not only leaves out much needed context for the findings, but it also makes it confusing to determine where the executive summary ends and where the main analysis begins in the reports.

RECOMMENDATION: **Provide a summary of data findings and make it clear where main analysis begins.** Each data visualization in the annual report should have information attached to it that explains what the data finding means. The report should make it clear where the main analysis begins in the report, following the executive summary.

The report lacks a well-defined structure for listing the data visualizations in the report. Some use-of-force findings are mentioned in the executive summary, followed by remedial training and complaints data, and then additional use-of-force findings are presented. In addition, data elements that belong in similar categories (demographics, injuries, etc.) are scattered throughout the report.

RECOMMENDATION: **Develop a defined outline and keep similar data elements together.** Annual use-of-force reports should have a defined structure for data findings and visualization. One approach is to group similar data elements together in sections of the report—for example, demographics (both officer and suspect) in one section, injuries in another section, etc.

Additional Data

PERF recommends the APD add several data points to the annual use-of-force reports in the future. The purpose of this is to increase the quality of the annual report by extracting additional insights from the use-of-force data.

Trends

APD collects data on use-of-force and reports on annual trends. PERF recommends that APD also report on monthly trends. Officer activity throughout the year may show an increase or decrease in use-of-force incidents related to deployments or significant events. On the next page is a chart showing monthly use of force trends by APD officers in the year 2020. This data was pulled from the APD's Excel database.
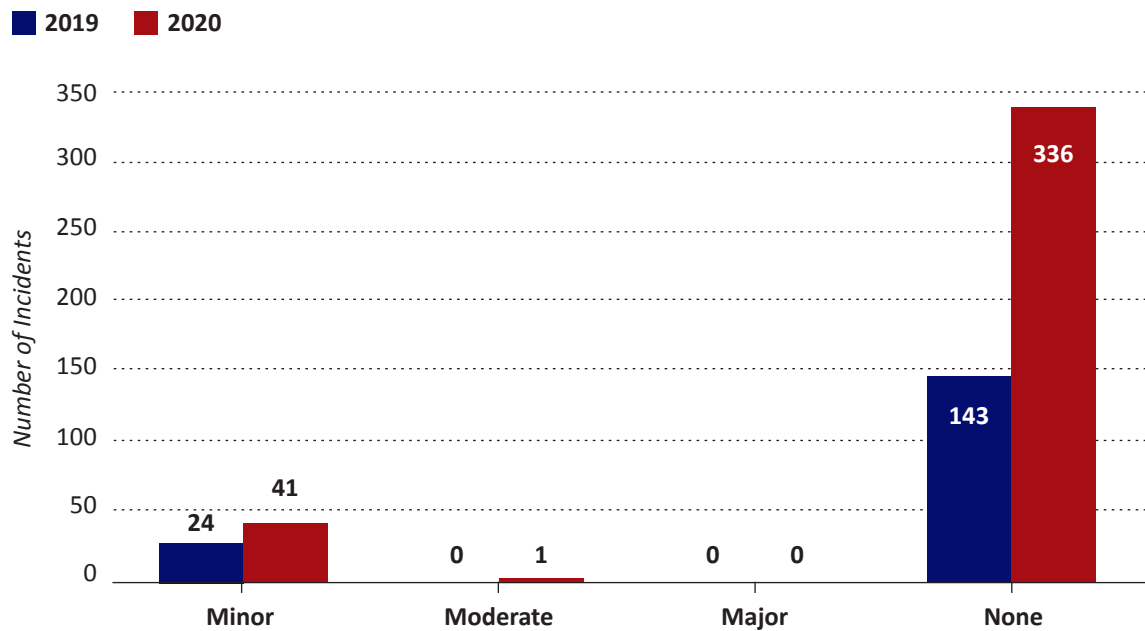
FIGURE 4.2

Monthly Use-of-Force Trends, 2020
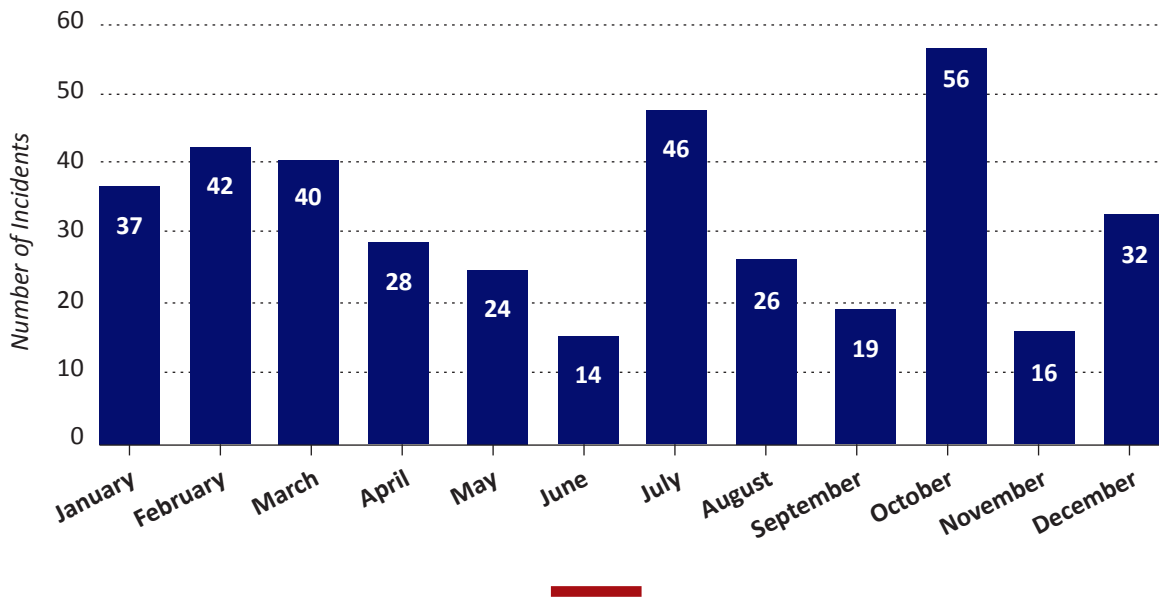
> **RECOMMENDATION: Report monthly use-of-force trends.** The APD should begin to report police use-of-force incidents broken down by month for each year in the future.

Magnitude of Injury

APD reports the total number of use-of-force incidents in which officers or suspects are injured. While it collects data on the magnitude of the injuries (minor, moderate, major), it does not report them publicly. The two figures on the next page show PERF's analysis of the magnitude of officer and suspect injuries.

FIGURE 4.3

Magnitude of Officer Injuries in Use-of-Force Incidents

■ 2019   ■ 2020

FIGURE 4.4

Magnitude of Suspect Injuries in Use-of-Force Incidents

■ 2019   ■ 2020
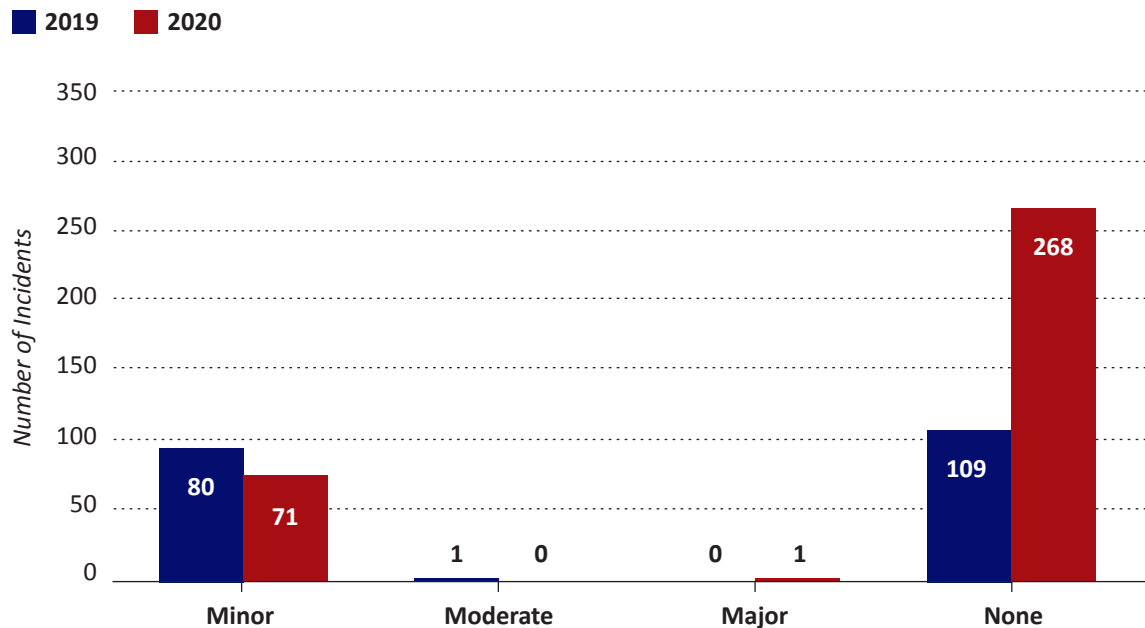
PERF recommends that APD report the magnitude of injuries to both officers and suspects in future annual reports. The data should be categorized by the same options found in the Excel data. In addition, "compliant of injury" data should be presented regarding incidents where a subject claims to have an injury although it is not apparent. The APD should also have clear and concise definitions of these categories, specifying what types of injuries constitute a certain

level of injury. This could be in the form of a list of examples of the kind of injuries that could be defined as minor, major, or moderate. For instance, a gunshot wound would be considered a major injury while a fall that resulted in a few scratches would be a minor injury.

> **RECOMMENDATION: Report the magnitude of injuries.** APD should report the level of injury to suspects and officers based on four main categories: minor, major, moderate, or none. APD should also provide clear definitions of what constitutes minor, moderate, and major injuries, with examples provided.

Use-of-Force Reason

APD collects data on the reason the officer was called to the scene (call-for-service type). However, APD does not collect and report data as to why force was used. Reasons could include to make an arrest, self-defense, in defense of another, to prevent a suspect from fleeing, etc.

> **RECOMMENDATION: Collect data and report reason for using force.** APD should collect data regarding the reason force was used and report it in future annual reports. This can provide additional insight into the nature of the event and if the use of force was necessary.

Number of Officers and Suspects

APD should also report the total number of incidents where more than one officer or suspects were present at the scene. This is a useful data metric that would be beneficial to include in all future reports. This data is found in the Excel data and APD's 2018 report, but not the 2019 or 2020 report. The 2018 report summarizes the incidents based on the call for service type and splits the data into two categories: number of officers present and number of suspects present. The number of officers or suspects is counted as 1, 2, or 3 or more. The APD did not include this type of data in the 2019 or 2020 annual reports, even though the data exists in the Excel files for those years.

PERF's analysis of this data found that most incidents involved one or two officers at the scene. See Figure 4.5. The number of incidents with one officer increased from 136 in 2019 to 176 in 2020. In instances with 2 officers, the number decreased from 98 to 93. For suspects, almost all cases involved only 1 suspect at the scene. The number of incidents with 1 suspect increased from 269 in 2019 to 339 in 2020. See Figure 4.6.
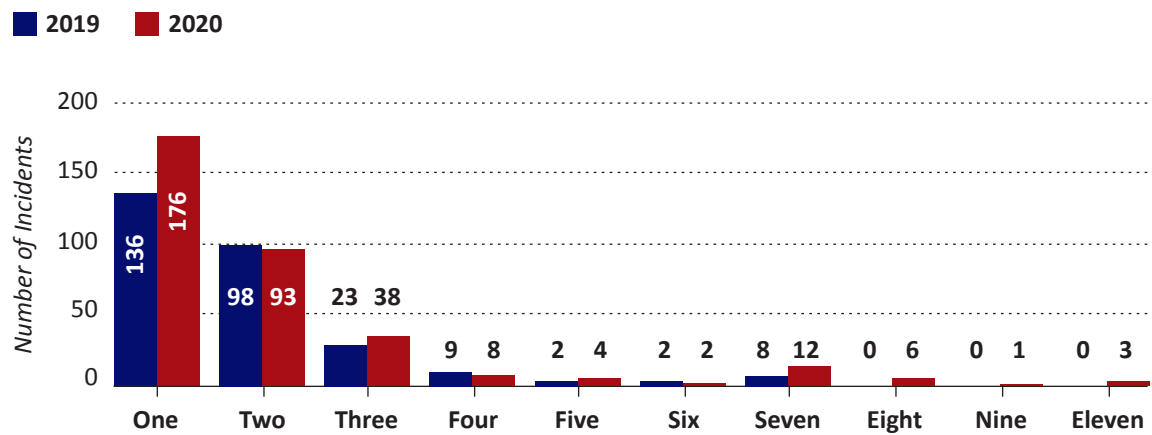
FIGURE 4.5

Total Number of Officers on the Scene

■ **2019**   ■ **2020**

FIGURE 4.6

Total Number of Suspects on the Scene

■ **2019**   ■ **2020**
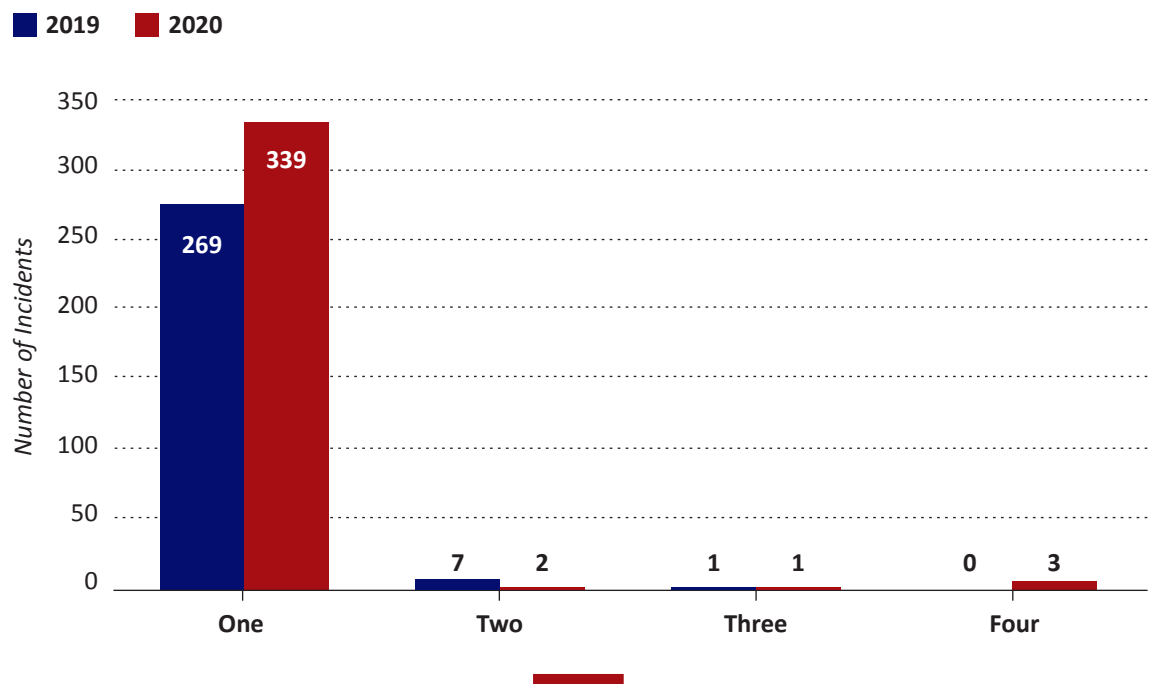
> **RECOMMENDATION: Report total number of officers and suspects at the scene.** The total number of officer and suspects at the scene should be reviewed and reported every year. It should follow the same pattern as the 2018 reports by summarizing the data by call-for-service type and splitting the data by officers and suspects. The data should also display the ratio of the number of officers to the number of suspects on the scene. An analysis of this data should be performed to determine if the number of officers on scene or the presence of a supervisor has an impact on whether force is used and the level of force used.

As discussed on page 57, PERF also recommends that supervisors be aware of the types of incidents that can result in force being used—such as calls involving persons with a mental illness, developmental disability, drug addiction, or other condition that is causing them to behave erratically or dangerously—and that supervisors respond to those calls. APD should add language to Section 4.2 of its use-of-force policy to require that supervisors be dispatched to all incidents where it is anticipated that force might be used.

Section V. Training

PERF staff toured APD's training academy, reviewed training materials provided by APD, including training on use of force and de-escalation, and interviewed training academy leaders, field training officers, and new officers. PERF was also asked to provide a train-the-trainer seminar to support APD's implementation of PERF's Integrating Communications, Assessment, and Tactics (ICAT) training.

The following section provides an overview of the implementation of ICAT and PERF's recommendations on how to strengthen APD's training.

Implementing ICAT

In addition to reviewing APD's use-of-force policies and practices, PERF was asked to provide an introduction to its ICAT training in the form of a train-the-trainer course as APD works to incorporate ICAT into its current use-of-force training.

ICAT will also provide guidance for all members of the department on the benefits of the Critical Decision-Making Model (CDM). For officers, the CDM provides officers with tactics to successfully assess situations, with an aim toward de-escalating force. For first-line supervisors, the CDM provides a consistent framework to evaluate whether the force used by officers in the field is appropriate and in line with department policy.

To begin the process, in October 2020, PERF staff conducted a virtual train-the-trainer seminar for APD's Training Section staff. In this training, PERF provided an overview of the ICAT curriculum and demonstrated several examples of the scenario-based training that is a key part of ICAT. APD participants appeared receptive to the training and were engaged throughout the process.

ICAT Training Guide contains seven modules:

Module 1: Introduction. This module explains the purpose and focus of the training, emphasizing that public safety and officer safety lie at the heart of the entire Training Guide.

Module 2: Critical Decision-Making Model (CDM). This module discusses the importance of critical thinking and decision-making for officers responding to the types of incidents that are the focus of this Training Guide. It presents the Critical Decision-Making Model as a training and operational tool for agencies to structure and support officers' decision-making.

Module 3: Crisis recognition. This module provides basic information on how to recognize individuals who are experiencing a behavioral crisis caused by mental illness, drug addiction, or other conditions.

Module 4: Tactical communications. This module provides more specific and detailed instruction on how to respond to such individuals and initiate communications with them. It focuses on key communications skills, including active listening and non-verbal communication, that are designed to help officers manage these situations and gain the subject's voluntary compliance with officers' instructions.

Module 5: Suicide by Cop. This module teaches officers to recognize and respond safely to incidents in which a person decides to attempt to die at the hands of a police officer. These encounters are called "Suicide by Cop" (SbC) incidents. Many SbC incidents can be resolved without using lethal force against the suicidal person, and without endangering officers or the public.

Module 6: Operational tactics. Using the Critical Decision-Making Model as the foundation, this module reviews critical pre-response, response, and post-response tactics to incidents in which a person in behavioral crisis is acting erratically or dangerously but is not brandishing a firearm. It emphasizes concepts such as the "tactical pause"; using distance and cover to give officers more time to engage the person and attempt to obtain voluntary compliance; using time to continue communications, de-escalate heightened emotional responses, and bring additional resources to the scene; tactical positioning and re-positioning of officers; and teamwork among responding officers.

Module 7: Step up and step in. This module integrates the previous six modules while presenting case studies in which officers may have missed opportunities to engage the subject, as well as examples of incidents in which officers successfully used these opportunities, allowing them to "step up and step in" and manage the scene to increase the likelihood of a favorable conclusion.

Integration and practice. Officers then participate in scenario-based exercises to put into practice the lessons taught in the previous modules.

The ICAT modules utilize lecture/discussion-based training and as well as practical, "hands-on" instruction methods in which students participate in acting out the types of scenarios that police officers actually encounter.

Traditional, lecture-based classes do not provide "kinesthetic learners" with the opportunities they need to be actively engaged in their leaning and retain the information presented. In addition, some individuals do not have a single learning style. Many students retain more information if it is presented across multiple learning styles.

ICAT instruction includes multiple hands-on activities and different methods of presenting lessons. In ICAT scenario-based sessions, one instructor may take the role of a person behaving erratically on a city street, for example, perhaps brandishing a knife or threatening to throw an object. The person might be speaking aggressively, or despondently, or not at all. Students take the roles of responding officers and demonstrate ICAT principles, such as having one officer attempt to communicate with the person, while others take specific supporting roles. A scenario might take 5 or 10 minutes to play out, and then ICAT students and instructors discuss how the scenario was resolved and how various strategies may have helped, or if they did not help, how officers switched to an alternate approach. Next, students may participate in new scenarios in which they attempt to demonstrate their understanding of ICAT principles.

In June 2021, PERF staff performed an in-person ICAT training session for approximately 15 APD instructors. The training appeared to be well-received, and feedback was positive. PERF also worked with APD's Training Section to develop materials and training for in-service training in March 2022. PERF staff attended and observed this training and provided support and feedback to the trainers. PERF plans to continue to support APD and provide additional training to its trainers.

> **RECOMMENDATION:** Document progress on ICAT implementation, including its integration into new recruit and in-service training. Obtain support and coaching for trainers from PERF, and document feedback and areas for ICAT training improvement.

> **RECOMMENDATION:** Integrate ICAT into APD's in-service training and scenario-based training with assistance from PERF.

APD's Pre-ICAT Training Materials

PERF reviewed 25 training documents and observed a session of APD's 2021 "Use-of-force and De-Escalation" In-Service Training. Overall, PERF found APD's training to be driven by case law and legal standards. Much of the course material focused on constitutional standards and applicable case law.

Each session of the training began with a Terminal Performance Objective. The first objective in the training stated, "Given an encounter with a non-compliant or violent subject, the officer will apply an objectively reasonable level of force to stabilize the situation, in accordance with state and federal statutes and current case law." The objective did not include any statement about diffusing or de-escalating a potentially violent situation.

Later in the training, there is an objective related to de-escalation of "non-compliant and non-violent subjects" that states that officers should employ de-escalation techniques. The definition of de-escalation used in the training materials is: "The use of non-confrontational verbal skills and body language to facilitate a successful outcome." The training highlights purported disadvantages of de-escalation, stating that de-escalation requires more time and resources, decreases officer safety, and that manipulative suspects can take advantage of officers who let their guard down. PERF shared several concerns with APD training staff regarding their slides and training about purported disadvantages of de-escalation. These myths are corrected in PERF's ICAT training.

APD's "Duty to Intercede" training section covered the topic of officers having a duty to speak up when they see improper or illegal actions by a fellow officer. It contained statements directly from policy and used materials from EPIC/ABLE training regarding active and passive bystandership. It could be enhanced by ICAT Module 7.

PERF staff observed two scenarios as part of the 2021 training. The scenarios were short and did not incorporate ICAT principles described below. In addition, APD has a significant focus on aligning training with Georgia State requirements, and all training must be submitted and approved by Georgia POST.

RECOMMENDATION: APD should fully integrate ICAT concepts into the department's training materials and provide ICAT training throughout the department. **PERF will support APD's Training Section's efforts to integrate ICAT concepts into its in-service training for 2022 and will attend trainings to assess these efforts and provide feedback.**

RECOMMENDATION: APD should enhance and improve its scenario-based training. In both recruit and in-service training programs, APD should provide use-of-force training that utilizes realistic and challenging scenarios that officers are likely to encounter in the field.

Scenarios should be based on real-life situations and encounters that officers in the agency have recently faced. Scenarios should go beyond the traditional "shoot-don't shoot" decision-making, and instead provide for a variety of possible outcomes, including situations in which communication, de-escalation, and use of less-lethal options are the best choices. Scenario-based training focused on decision-making should be integrated with officers' regular requalification on their firearms and less-lethal equipment.

PERF recommends that APD command staff regularly evaluate how the training is being delivered. To do so, it is recommended that senior leaders in the academy attend classes and personally observe how the training is being delivered. At a 2016 PERF conference, then-Commissioner Charles Ramsey of the Philadelphia Police Department noted: "You have to periodically check to make sure that the academy training is consistent with what you're trying to achieve. Just going by and listening is a good way to do that."

RECOMMENDATION: APD should evaluate training instructors regularly to ensure that training is being implemented in a consistent manner that is consistent with APD's mission and goals. With respect to ICAT, senior leaders in APD's academy should sit in on classes to personally observe the instruction of ICAT and ensure that training is presented in the manner intended by APD command. PERF has offered to send training staff to observe training scheduled for 2022 and provide support and feedback to trainers.

PERF staff will continue to provide support to APD staff members as they work to implement the ICAT curriculum within the department.

PERF's Integrating Communications, Assessment, and Tactics Training Guide

To help law enforcement agencies implement PERF's 30 Guiding Principles on Use of Force,[58] PERF developed *ICAT: Integrating Communications, Assessment, and Tactics*,[59] a training guide that represents a new way of thinking about use-of-force training for American police officers. ICAT takes the essential building blocks of critical thinking, crisis intervention, communications, and tactics, and puts them together in an integrated approach to training.

ICAT is designed to increase officer safety and public safety by providing officers with more tools, skills, and options for handling critical incidents, especially those involving subjects who are in crisis but who are not armed with firearms. The cornerstones of ICAT include slowing incidents down in order to avoid reaching a point where there is a need to use lethal force, upholding the sanctity of life, building community trust, and protecting officers from physical, emotional, and legal harm.

The ICAT Training Guide is composed of the following topics:
- Introduction to ICAT
- Critical Decision-Making Model
- Crisis Recognition and Response
- Tactical Communications
- Operational Safety Tactics
- Integration and Practice
- Suicide by Cop

The ICAT Training Guide includes model lesson plans, scenario-based training exercises, PowerPoint presentations, case study videos of use-of-force incidents, and other resources. The Training Guide was developed with the help of a working group of more than 60 professionals representing law enforcement agencies and other organizations from across the country. A panel of 10 policing experts reviewed a draft of the Training Guide, and the training was pilot-tested in seven sites throughout the country.

Feedback from the expert review and pilot sites was incorporated into a final report,[60] and in 2016, PERF held a national meeting on how to implement ICAT Training. This meeting, held in New Orleans, was attended by more than 400 individuals representing more than 160 police agencies. To date, more than 500 law enforcement agencies have attended ICAT training meetings.

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58   Police Executive Research Forum (2016). *Guiding Principles on Use of Force.* https://www.policeforum.org/assets/guidingprinciples1.pdf

59   Police Executive Research Forum (2016). *ICAT: Integrating Communications, Assessment, and Tactics. Training Guide for Defusing Critical Incidents.* http://www.policeforum.org/assets/icattrainingguide.pdf

60   Ibid.

Training on Policy Changes and Updates

When policy changes necessitate training changes, the Training Section should be involved in the policy-making process. Specifically, the Training Section should be involved in policy updates and the implementation of new policies. Involving the Training Section will provide them with time to prepare new or updated curricula that can be released in tandem with any policy changes. This is important because **policy changes will not be effective in the long-term without training to implement those changes in the field.** Officers may be more receptive to policy changes if they are given the tools to meet the department's new expectations. Additionally, training plays a significant role in setting the culture of an agency by ensuring that policy changes are sustainable and practical.

> **RECOMMENDATION:** APD should involve the Training Section in the policy-making process when it is expected that training will need to be altered in accordance with the new policy directive(s).

APD leaders should ensure that changes being made in policy are supported by changes in training.

Accountability

Training must constantly be reinforced in the field to remain effective. Therefore, it is critical that sergeants and lieutenants monitor the behavior of officers and ensure that training is being implemented correctly.

> **RECOMMENDATION:** APD should require sergeants and lieutenants to monitor the implementation of training in the field. If officers are not in compliance with training, sergeants and lieutenants should intervene and correct the behavior immediately. Supervisors should be held accountable if these corrective measures are not taken.

Although accountability at the first-line supervisor level is important, this accountability needs to be seen through all levels of the department up to command staff. APD leaders will need to take appropriate steps to continue to support changes that increase accountability. Specifically, the Chief can support changes by addressing officers during roll calls and recording videos articulating the reasons behind changes and setting clear expectations for the department.

Additionally, it is important for APD to track positive behavior related to use of force in addition to tracking areas for improvement. Doing so will help reinforce training and potentially increase morale. The Los Angeles Police Department, the Denver Police Department, and the Philadelphia Police Department are among the many departments that have implemented awards for officers who demonstrate de-escalation techniques in the field.[61]

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61   See: Phillips, Noelle, "Eight Denver Police Department officers awarded for showing restraint when gunfire would have been justified," *Denver Post,* April 19, 2018, https://www.denverpost.com/2018/04/19/denver-police-preservation-of-life-medal/;
"Police Departments begin to reward officers for showing restraint," *CBS News,* May 31, 2016. https://www.cbsnews.com/news/police-departments-begin-to-reward-officers-for-showing-restraint-philadelphia/; Los Angeles Police Department. (2018). *Chief Michel Moore Honors 29 Officers with the Distinguished Medal of Valor, Purple Heart & Preservation of Life Awards* [Press Release]. https://www.lapdonline.org/newsroom/chief-michel-moore-honors-29-officers-with-the-distinguished-medal-of-valor-purple-heart-preservation-of-life-awards/

> **RECOMMENDATION:** APD should commend officers who demonstrate appropriate use of force or restraint in accordance with department policy and who practice de-escalation techniques in the field.

Field Training

In 2019, APD moved from a 12-week Field Training Program (FTP) to a six-week model. The change was instituted for the purpose of faster placement of new officers into the Field Operations Division (FOD). While this model benefited FOD by reducing the vacancies, it affected the field experiences the new officers. The current APD Field Training Program is a six-week program. Officer candidates rotate every two weeks between three Zones, with one day of training at the training academy before each rotation.

PERF interviewed training staff, FTOs, zone commanders, and officers who recently completed field training. Without exception, all stated that a longer field training experience was desirable. FTOs and new officers stated that it would also be helpful if training was configured so that each trainee returned for a final rotation to their initial FTO. Some trainees reported showing up to their first day of field training and meeting their FTO for the first time. FTOs expressed an interest in more training and recognition for their work.

Field Training Officers are required to have a minimum of three years of APD experience and to complete a 40-hour GA POST Approved Training Officer Course. After being certified, FTOs receive a one-hour refresher course each year. Currently, there are 55 FTOs in the program, with 44 active. Currently, FTOs do not receive any incentive to stay in patrol and train candidates, rather than trying to move into specialized assignments.

In April 2021, Major Watson and his team submitted a proposal outlining suggested improvements to the Field Training Program. These recommendations include lengthening field training, offering a pay incentive to FTOs, providing additional training to FTOs, digitizing the "rook book" and daily observation reports, and adding a dedicated sergeant to oversee and support FTOs. PERF supports these recommendations.

RECOMMENDATION: APD should lengthen and strengthen its field training program for new recruits.

The current APD field training program is shorter than many peer FTO programs in police departments of similar size. Ideally, officers should spend three to four months in field training. During that time, new officers should spend time with, and be evaluated by, several different Field Training Officers (FTOs). At the end of that process, the officer's original FTO should evaluate the recruit by shadowing them, dressed in plainclothes. Best practice field training programs include the San Jose Model[62] and the Reno Patrol Training Officer program.[63]

Currently, APD is running a 12-week field training pilot that include 4 rotations:
- Phase 1- with FTO A (3 weeks) Initial FTO instruction.
- Phase 2- With FTO B (3 weeks) New concepts learned/measured progression.
- Phase 3- With FTO C (3 weeks) New concepts learned/measured progression.
- Phase 4- With FTO A (3 weeks) Summative evaluation by initial FTO.

PERF recommends that this pilot be evaluated and expanded to future field training if successful.

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62   San Jose Police Department. "Field Training Officer (FTO) Program."
https://www.sjpd.org/about-us/organization/bureau-of-field-operations/field-training-program

63   The Reno Police Department. "PTO (Police Officer Training) Program." https://www.renopd.com/PTO

RECOMMENDATION: APD should ensure that its FTOs receive annual refresher training, specific to their function, to ensure that they understand their roles and responsibilities.

APD's April 2021 proposal recommends that FTOs receive eight hours of refresher training annually. Additionally, their status as an FTO will be taken into consideration quarterly based on Officer Candidate feedback, supervisory review, self-assessment, and self-initiated professional development. PERF supports the implementation of this internal recommendation.

RECOMMENDATION: APD should provide an incentive to encourage more officers to become FTOs.

APD has a limited number of FTOs and is challenged to keep FTOs active in the program. The training academy team has recommended a financial incentive for active FTOs. Another idea would be to include FTO responsibilities in the role of Senior Police Officers (SPOs). SPOs have to pass a test to become SPOs and receive a pay increase for the role. APD may also wish to consider other incentives to encourage participation in the FTO program.

> **RECOMMENDATION:** Establish a supervisory position at the Training Academy whose responsibility is to follow up with trainees in the field, make necessary adjustments in scheduling, support and evaluate FTOs, and be responsible for FTO training and feedback.

> **RECOMMENDATION:** Digitize the Rook Book and the Daily Observation Reports.
>
> Currently, all observations and feedback about trainees are contained on paper. This limits information-sharing between the different FTOs who supervise trainees; and academy staff and supervisors don't have real-time visibility into these records. APD is investigating apps and online platforms that could capture this data. PERF supports this effort and recommends piloting a digital platform for use by recruits and FTOs to facilitate the field training program.

The new Public Safety Training Center will be an 85-acre joint fire and police training facility. The campus will include a mock training village, which will help to ensure full implementation of ICAT programing through fully immersive reality-based training. An EVOC course, firing range drill tower, mounted stables, K9 kennels, training Fire Station, and a building dedicated to leadership development programing are also planned. The campus is being designed for park space adjacent to the classroom buildings and physical fitness fields to create opportunities for citizen/police interactions. The campus is scheduled to open in Fall of 2023.

Section VI. Office of Professional Standards Review

PERF was also asked to assess the Atlanta Police Department's Office of Professional Standards (OPS), specifically related to its complaint investigation process, interaction with the Atlanta Citizen Review Board (ACRB), and its early intervention system. **PERF was not asked to conduct a review of individual complaints or provided access to complaints and investigative files as part of this project.**

Community members can make a complaint to the Atlanta Citizen Review Board, OPS, or any police precinct.

Atlanta Citizen Review Board
The Atlanta Citizen Review Board (ACRB) was established by City Ordinance in 2007. It is designed to provide citizen oversight of misconduct accusations against sworn members of the police and corrections departments in the City of Atlanta. It is independent from APD. The ACRB is composed of 13 members, selected from various constituencies throughout the City. The Board accepts complaints, investigates the complaints, and is authorized to conduct hearings to resolve complaints and make recommendations to the Chief of Police. In 2020, the ACRB investigated and reviewed 36 complaints. In 2021, it has investigated and reviewed 26 complaints as of September.

OPS and ACRB do not conduct simultaneous investigations. If a complaint comes to the ACRB, ACRB will investigate and issue a finding and recommendation to the Chief of Police. If the complaint is sustained, OPS will begin its own independent investigation of the complaint. If the complaint is not sustained, OPS does not investigate. In some instances where the ACRB sustains a complaint, OPS may come to a different determination, because the entities may apply different standards.

Internal Affairs Investigations Process Outlined
Investigations of complaints at APD may take one of two paths: by the chain of command, or by the Office of Professional Standards (OPS). The process is completely paper-based.

Minor complaints are handled by the employee's supervisor and chain of command and may result in counseling and retraining. Repeated performance deficiencies may be considered for minor disciplinary action, involving a verbal or written reprimand. These command recommendations are not reviewed or approved by OPS. Instead, the investigating supervisor in the Zone (a sergeant) will make a recommendation to sustain or not sustain the complaint to a lieutenant. If a command investigation is sustained, it will progress up the chain of command to the Deputy Chief of the Division for final review.

Serious complaints are investigated by OPS. OPS detectives conduct investigations and recommend dispositions. The investigation and disposition processes are similar for supervisory-level investigations. A lieutenant reviews the results of the investigation and determines applicable violations. Then it goes to the OPS Major for review. If the OPS Major concurs with the findings, he/she forwards it to the subject officer's chain of command who ultimately decide on discipline. OPS does *not* recommend or decide discipline.

The officer's chain of command recommends discipline based on the severity of the policy violation and the facts of the case, applying a progressive discipline standard and using the

guidelines established within APD's Disciplinary SOP.[64] Different levels of discipline are available based on the nature of the violation and the rank of the supervisors issuing the discipline. Once discipline is recommended by a supervisor, it will be reviewed by the divisional Deputy Chief, Assistant Chief, or Chief of Police, depending on the type of violation and discipline recommended. Demotions and terminations are reviewed by the Chief.

While OPS strives to conclude investigations and dispositions in a timely fashion, some investigations take extended periods of time.

OPS uses IAPro[65] to record and track all complaints. IAPro is a software tool capable of documenting internal investigations, use-of-force incidents, and vehicle pursuits. It also has capabilities to provide early intervention alerts. OPS currently uses IAPro as an early intervention system based on complaints.

> **RECOMMENDATION:** APD should endeavor to move to an electronic process to capture complaints, investigations, outcomes, and discipline taken. Electronic recordkeeping would allow for stronger information-sharing mechanisms, data analysis capability, and uniformity in case files.
>
> OPS personnel reported that they are interested in moving to an electronic process and are currently investigating different software.

> **RECOMMENDATION:** APD should implement tools to ensure consistency around command investigations and reviews. OPS should develop a training for zone sergeants who are tasked with conducting command investigations and provide a framework for completing these investigations. There should be a standardized format and package for command investigations to complete and move through their chain of command.

> **RECOMMENDATION:** APD should designate a single point of review for all command investigations. Currently, no one person at OPS or APD reviews all investigations. This could result in APD missing some overall trends or training issues, or missing a situation in which an officer has moved between Zones and Divisions but has multiple complaints. OPS review of all command investigations would provide a more holistic view and promote consistency within the agency.

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64   Atlanta Police Department Policy Manual, *APD.SOP.2020 Disciplinary Process*

65   https://www.iapro.com/

Early Intervention System (EIS)

Over the past 25 years, the use of an Early Intervention System (EIS),[66] especially for large and medium-size police agencies, has emerged as a widespread practice in police personnel management.[67] The underlying concept of an EIS is that serious incidents of police officer misconduct often do not erupt unexpectedly. Rather, such significant events are often preceded by a number of minor past incidents or concerning patterns of behavior. An EIS is designed to help agencies identify these potential areas of concern and address them through training, counseling, or other non-punitive measures before serious misconduct occurs.

For example, an Early Intervention System can help to flag officers who are using force more often than other officers in similar assignments, or who are using force more often than they did in the past. This system would identify officers who would benefit from additional de-escalation and CDM training. The ultimate goal of an EIS is to identify officers who may be experiencing stress or exhibiting troubling behavior before it reaches the level of misconduct.

How an EIS Works

An EIS generally consists of four components:[68]

- **Performance metrics or variables** that are related to incidents and behaviors, and that could be potential indicators of future misconduct or performance problems. Examples include citizen complaints against the officer, uses of force, lawsuits against the officer, the officer's performance evaluations, supervisory actions against the officer, excessive sick leave, etc. Some agencies' EIS systems track as few as a half-dozen indicators, while other agencies may track 20 or more data points.
- **The threshold levels for these variables** to identify, or flag, officers with possible performance concerns. When a threshold is met, an alert is "triggered" in the system and the officer's supervisor is notified. For example, if "complaints against an officer" is a variable included in the EIS, then NCPD must determine how many complaints must be filed, and in what time period, in order for the EIS alert to be triggered.
- **The intervention** that the officer's supervisor will use to address the performance problems. Interventions are designed to be non-punitive and to help modify the officer's patterns of behavior, and they may include options such as additional training, counseling, or a change of assignment.
- **Follow-up monitoring** of the officer after the intervention is implemented.

Based on interviews with APD personnel, the PERF team learned that APD utilizes an EIS, but its use is solely limited to internal affairs complaints. **APD should expand the use of its EIS to track and monitor additional trends, including all uses of force, whether they are the subject of a complaint or not.**

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66   In the early stages of these systems' development, they were commonly referred to as Early Warning Systems (EWS). The use of the word "warning" connoted to many officers a punitive, disciplinary potential to these systems, which was counterproductive if the goal is to prevent problems from occurring. Thus, the word "Intervention" came into use as a replacement. Some entities refer to these as Early Identification and Intervention Systems. This report will use Early Intervention Systems (EIS) as the generic term.

67   Samuel Walker (2005). *The New World of Police Accountability.* Thousand Oaks, CA: SAGE Publications, Inc.

68   The John F. Finn Institute for Public Safety, Inc. (2015). *Features of Contemporary Early Intervention Systems: The State of the Art.* IACP 2015 Conference, Chicago, IL.

RECOMMENDATION: APD should expand the use of its EIS to track and monitor information beyond officer complaints, to include all uses of force, abuse of sick leave, tardiness, and other potentially problematic trends, such as making a high number of arrests for disorderly conduct or assault on police officer. Other information that APD could track in the EIS are civil actions filed against the officer, criminal investigations of the officer, domestic violence and sexual harassment allegations against the officer, vehicular collisions involving the officer, positive drug tests, high rates of cases/arrests dismissed or evidence suppressed, insubordination, and neglect of duty.

OPS currently utilizes IAPro as its Early Warning System. However, it is an older version of the software and is not user-friendly. PERF recommends upgrading IAPro and using its expanded capacity for its Early Intervention System.

RECOMMENDATION: APD should upgrade its version of IAPro and expand its capacity to be used as an Early Intervention System. In the alternative, APD should investigate other EIS software solutions from Mark43 and Benchmark Analytics.

Section VII. Communications

In the course of its review, the PERF team learned that APD faced challenges with both internal and external communications. Internally, there was a breakdown in communications from the top down and the bottom up. Staff members at all ranks identified communication as a challenge. With respect to external communications, while the Mayor's Office and APD have a strong relationship and share information, they do not have a joint overarching public safety and reform messaging strategy. This may diminish their collective ability to inform the public about the good work that APD and the City are doing to reduce crime and improve police policies and practices.

Internal Communications

APD leaders expressed a strong desire to improve internal communications methods to ensure that all APD personnel are well informed about mission, vision, and strategies of the department, to increase opportunities for input from officers, and to improve employees' morale.

PERF recommended that APD use an outside organization to conduct focus groups of officers and sergeants to obtain insight and feedback about internal communications. PERF also recommended that APD leaders engage in more direct communication with sergeants, instead of relying on information to flow down the chain of command. Based on PERF's recommendations, APD *already has implemented* the following measures to improve internal communications:

1. Increased messaging to sergeants and officers to ensure that APD's mission, vision, and specific strategies are being communicated properly at all levels of the department.
2. Increased roll call visits by executive command staff to obtain feedback from officers.
3. APD Urban Planning and Management conducted officer focus groups to obtain feedback about internal communications.
4. APD used feedback from officer focus groups to improve its internal communications plan.
5. Expanded content on Chief's Corner, a video platform through which Chief Bryant provides information directly to police officers.
6. Increased promotion of news and information about officers' accomplishments on social media platforms and news media releases.
7. Increased direct messaging from Public Affairs to APD staff to ensure they were informed about significant issues to be reported by the media.
8. Deputy Chiefs conducted divisional Q&A sessions with officers.
9. Expanded the Atlanta Police Leadership Institute (APLI) to include additional sessions with executive command staff. APLI is a local leadership curriculum run by the Atlanta Police Foundation to develop a well-rounded understanding of APD operations and prepare mid-level leaders to manage the challenges facing police.

PERF recommends that these efforts continue, and that APD executive command staff continue to create forums and opportunities to interact directly with sergeants and officers. This will help to get input and feedback from officers and sergeants, while ensuring that changes in policy and strategy adopted by command are filtering down to frontline officers.

External Communications

It is critically important to keep the public informed about Atlanta's police reform and public safety efforts. A coordinated communications strategy by APD and the Mayor's Office would promote the dissemination of consistent and accurate information.

To facilitate transparency and consistent messaging, PERF and APD Urban worked with APD and Mayor's Office communications leaders to develop a unified communications strategy, which will provide information to the community about the work being done and progress made to date.

An outline of this recommended strategy can be found below.

RECOMMENDATION: PERF recommends that APD and the Mayor's Office adopt a joint communications and messaging strategy to inform the public about the work that is being done to reduce crime while increasing trust, transparency, and accountability.

Draft Communications Strategy

Title: Our City. Our Safety.
Tagline: Stronger Together.

Lead Talking Points:
- Creating safer neighborhoods by reducing violence through strong community and public safety partnerships
- Strengthening public trust and engagement by being more accountable to the people we serve
- Enhancing policies and training that center on 21st century policing best practices

Reducing Violent Crime	Increasing Trust, Transparency, and Accountability
Headlines: • Data-driven policing to better anticipate and respond to violence. • Investing in evidence-based, community violence reduction programs.	**Headlines:** • Drive down overall use of force by training officers to de-escalate difficult situations and to create time, distance, and tactical realignment.

Reducing Violent Crime	Increasing Trust, Transparency, and Accountability

Data Driven Policing:
• Most of the violence is driven by interpersonal disputes between people.
• Many incidents are connected to bars and nightclubs.
• Formed a citywide taskforce focused on bars and clubs that aren't following the rules and aren't safe.
• The Nuisance Property task force is monitoring and taking action at 32 locations, including 11 bars and nightclubs. Their work has resulted in the issuance of fines and revocation of certificates of occupancy.
• Working with prosecutors and community partners to identify the individuals responsible for violence in our city and holding them accountable
   • Improving coordination between police, prosecutors, and court systems at the City and County level for people who commit multiple violent crimes
   • Increasing nuisance property enforcement
• Building a Real Time Crime Center
   • Expanding the Operational Shield camera network by 250 cameras by December 2021
   • APD will be able to see 10,000 camera feeds.
   • All data and intelligence in a central location
• Staffing and crime analysis 24/7 to prevent and solve crime
	Headlines:
	• Integrating Communication, Assessment, and Tactics training for every police officer.
	• Ensuring that our community has a voice in how their police department works.
	• A renewed commitment to police accountability, with a focus on greater transparency, increased community partnership, and world-class training and professional standards.
	• Improving use-of-force policies and training to incorporate best practices
	• Published a use-of-force dashboard to increase transparency and show our progress reducing use of force
	• 26% reduction in total use-of-force reports from 2019 to 2020
	• Implementing ICAT, which is a training program providing responding police officers with the tools, skills, and options they need to successfully and safely defuse a range of critical incidents.
	• Implementing numerous administrative orders focused on an officer's duty to intervene, improved officer compliance, public transparency with body-worn camera footage, and increased community awareness of the ACRB
	• Ensuring all "8 Can't Wait" policies are reflected in APD's SOPs

Reducing Violent Crime	Increasing Trust, Transparency, and Accountability

Evidence Based Community Violence Reduction:
• Launching Cure Violence: Street out-reach workers will be working to de-escalate conflicts and reducing shootings and violence.
• Created Office of Violence Reduction
• Focus on expert-, evidence-, and community-based violence reduction strategies ($70M investment) that are both enforcement and non-enforcement based.
    • Creating and expanding public awareness campaigns
    • Building community capacity and infrastructure (e.g., convening youth and faith leaders, investing in mental health services, and expanding reentry services)
    • Adding 10,000 additional street-lights in areas where more violence occurs
    • Hiring 250 new police officers
	Ensuring all Atlantans have meaningful opportunities to participate in and share their input on police reform and community safety efforts:
	• Engagement (press release here) began in January 2021, with a city-wide survey, several APD focus groups, and one business town hall
	• Focus groups held in September to get community input on use-of-force policy recommendations.
	• Town Halls
	• APD Urban website
	
	Engaged PERF to conduct a comprehensive review of APD training and policies, ensuring a world-class police department with 21st century policing practices
	• Engagement with Police Executive Research Forum (press release here) began in November 2020 with two APD site visits, two focus groups, 22 interviews, and 50 use-of-force policy recommendations
	• PERF has held brought in subject matter experts and police leaders from across the country to advise APD on best practices in crime analysis, violence reduction, community engagement, officer wellness, recruitment, and a number of other areas.

Additional Recommendations

In the course of its review, the PERF team identified additional recommendations to assist the Atlanta Police Department. While they do not all fall under the initial scope of work, they may be beneficial to the department as a whole.

Transparency

Both internal and external transparency are important for a law enforcement organization. Transparency helps improve morale among officers and fosters trust within the community. Therefore, APD should make an effort to promote transparency throughout the agency and with the community.

Internal Transparency

The Atlanta Police Department is undergoing major changes to use-of-force policy and training. Making such changes can be a difficult process for all involved. Officers expressed concern that some of the changes happened too quickly and that there is a need for better communication regarding the reasoning behind policy changes. This concern was not limited to changes in the department's use-of-force policies. Officers cited an overall need for better communication between leadership and officers on the street. As discussed earlier, APD leaders can communicate policy changes through videos and roll calls. Involving officers in the policy-making process and focusing on the role of first-line supervisors in explaining policy changes can also help address officers' concern about the pace of change in the department.

Involving officers in the policy-making process is important in promoting internal transparency about the direction the department is moving. To do so, PERF recommends that APD create a system that allows officers to provide feedback on new policies and policy changes. The Planning, Research, and Accreditation Unit (PRAU) should identify internal subject matter experts who can provide feedback on potential policy changes and updates. Selected individuals in the department who will be most impacted by a policy should be encouraged to provide feedback as well. PRAU should review all feedback and incorporate helpful suggestions as much as possible before the policy is disseminated department-wide.

Once a policy is enacted, members of the department should be allowed to provide feedback to PRAU about the policy's operational impacts for a set period of time. Full impacts of the policy on operations may not be known until it has been enacted in the field. By allowing a grace period for feedback, APD can mitigate unintended consequences from the policy that negatively impact police operations. APD should consider using PowerDMS as a tool for this feedback.

RECOMMENDATION: APD should create a formal system to be overseen by the PRAU to allow feedback during the policy making process. This system should allow for input from internal subject matter experts and by individuals within the department who will be significantly impacted by the policy. Once the policy has been implemented, feedback should be solicited from the field on how the policy impacts daily operations. APD should consider allowing feedback via PowerDMS and should ensure that each policy goes through the same process. For example, when a policy is issued, APD should use the current PowerDMS system to send the policy out to a consistent group of individuals who have been designated to review policy changes. Individuals to include would be all commanders, the department's legal representatives, elected union officials, and other internal subject matter experts. Within a certain number of days, this group should provide feedback and additional recommendations to be considered by PRAU as they finalize the policy.

External Transparency

APD follows promising practices by making its policies available online through its website, an important step in promoting external transparency. It also releases an annual report that provides information about the department to the public and an annual use-of-force report. In August 2021, the Mayor's Office and APD released a public use-of-force dashboard and a video evidence submittal portal.

The use-of-force dashboard was created as a collaborative effort between the Mayor's Office, APD, the Atlanta Citizen Review Board (ACRB), and Atlanta Information Management. The purpose of the dashboard is to improve transparency and increase trust between the public and APD. The dashboard, which current lives on Atlanta's Justice Reform website (https://justicereform.atlantaga.gov/use-of-force) will be updated quarterly. PERF recommends that the use-of-force dashboard be updated regularly and become part of the APD's website.

RECOMMENDATION: PERF recommends that the use-of-force dashboard be housed on APD's website and updated quarterly.

The Mayor's Office and APD also launched a Video Evidence Submittal Portal which allows members of the public to submit video footage when filing a complaint with APD, including evidence of an alleged use-of-force incident. Complaints and associated footage may be submitted anonymously and will be submitted to APD's Office of Professional Standard.

Continuing to collect data on use-of-force should be a priority for APD. Use-of-force data collection benefits the APD internally, and it can benefit agencies nationally. APD should participate in the FBI's National Use-of-Force database, which began data collection on January 1, 2019.[69] The FBI's use-of-force data collection efforts are supported by major policing organizations, including PERF, the Major Cities Chiefs Association (MCCA), the National Sheriffs' Association (NSA), the Major County Sheriffs of America, the International Association of Chiefs of Police (IACP), the Association of State Criminal Investigative Agencies, the National Organization of Black Law Enforcement Executives (NOBLE), and the Association of State Uniform Crime Reporting Programs.

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69   More information on the FBI's National Use-of-force Database can be found at https://www.fbi.gov/services/cjis/ucr/use-of-force

> **RECOMMENDATION:** APD should be prepared to participate and submit data to the FBI's National Use-of-Force database as soon as possible. Data collection began on January 1, 2019.

Command Promotions

Creating a leadership pipeline is a critical component in the operation of a police department over time. APD invests in leadership development by sending supervisors to national leadership training programs, including PERF's Senior Management Institute for Police (SMIP) and a local leadership institute run by the Atlanta Police Foundation called the Atlanta Police Leadership Institute (APLI). APLI is a five-tier, leadership-focused curriculum designed to develop a well-rounded understanding of APD operations and prepare mid-level leaders to manage the challenges facing law enforcement today.

It came to PERF's attention that as part of its leadership development efforts, APD tends to rotate division, section, and unit commanders frequently in order to expose them to the different areas of the department. While this exposure can be useful in expanding commanders' experience, frequent leadership rotations may lead to some instability within units. Additionally, it can be challenging to implement change in a division, section or unit without continuity of command. PERF recommends that APD assess the duration of command assignments and strive to balance the desire for command exposure to a wide range of experiences with the benefit of command stability.

> **RECOMMENDATION:** Frequent changes in leadership can undermine the ability to implement effective change. PERF recommends that APD assess the duration of command assignments and strive to balance the desire for command exposure with the benefit of command stability. This can often be critical for zone commanders, where establishing relationships with community and business leaders is imperative for success.

PERF also learned that there is no transparent process for promotion to the rank of captain or above. The absence of a transparent and open process to be considered for promotion to a command rank can create the appearance that promotions are based on relationships, rather than merit. PERF recommends that APD create a process through which lieutenants and above can apply and be considered for open command positions, and that APD share clear expectations about what factors will be considered when making promotions. For example, the Baltimore Police Department has developed a policy on command promotions and created a command promotions committee.[70] The purpose of the policy is to establish the minimum guidelines and describe the selection procedure for promotion to the command ranks of Captain and Major. There is an application form and scoring matrix to support the process. The ultimate promotional decision remains with the chief.

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70   Baltimore Police Department, Policy 1738: Command Promotions and Promotion Committee. May 3, 2021.
https://public.powerdms.com/BALTIMOREMD/documents/877066

RECOMMENDATION: The APD should consider creating a policy and process governing command promotions through which lieutenants and captains can apply and be considered for open command positions, and that there is transparency about what factors will be considered when making promotions.

RECOMMENDATION: APD should also endeavor, when possible, to have a training and transition period for new commanders moving to new assignments.

Conclusion

The Atlanta Police Department (APD) has demonstrated a commitment to improving its policies and practices on officers' use of force, as well as issues of crime reduction, professional standards, and the Police Department's relationship and communications with the Atlanta community.

As this report was being written, APD already was making changes on many of the issues that PERF identified.

One major theme of PERF's evaluation is that training of APD officers can be improved. As part of this project, PERF provided APD with assistance in implementing PERF's ICAT training program. A key part of this training is teaching officers to use a Critical Decision-Making Model (CDM),[71] which is a tool for expanding the range of options that police officers consider as they respond to any situation, including situations that may involve a use of force.

By using the CDM, officers in many situations may be able to resolve an incident without using force, or they may make a better choice about the type of force that is most likely to be effective.

PERF facilitated a train-the-trainer seminar on ICAT and the CDM for APD's Training Section staff. PERF returned to assist APD when it began ICAT instruction in March of 2022, in order to ensure the quality of instruction and facilitate understanding of the program. PERF plans to provide continued support to APD trainers to implement ICAT.

PERF was pleased to find that APD personnel were receptive to the training. There is more work to be done to integrate ICAT principles into APD's training. PERF recommends that APD commanders regularly attend ICAT trainings to ensure that instruction remains consistent. And the Critical Decision-Making Model must become part of the organization culture and used throughout the agency. The CDM should be used daily in all operational settings, as a tool during weekly COBRA meetings, and to evaluate use of force. PERF is available to provide guidance and support to APD as the department continues its implementation of ICAT and the CDM.

Moving Forward in 2022

As the City of Atlanta government shifts to a new Administration with Mayor Andre Dickens, PERF looks forward working with APD to implement new approaches to police operations, policies, training, crime-fighting, accountability, and communications with the Atlanta community. PERF will also work with Mayor Dickens and the new administration to build on the work accomplished to date and recommendations for the future. This report outlines the changes that PERF believes will improve policing and crime-fighting in Atlanta.

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71 "ICAT Module 2: The Critical Decision-Making Model." Police Executive Research Forum
https://www.policeforum.org/icat-module-2

Appendix A: APD Use-of-Force Advisory Council Final 45-Day Report and Strategic Recommendations

APD Policy	Lead Use of Force SOP with principles/values to set tone for Use of Force policies, incorporating additional principles consistent with APD's emerging vision, mission and values	Create de-escalation requirements out-lining specific examples/tactics and creating a requirement to consider vulnerable populations when deciding to use force	Strengthen Use of Force Continuum with clearer definitions for levels of subject resistance and force to ensure proportionality	Further restrict use of deadly force/ firearms, including designation of deadly force as a "last resort" and outlining requirements before use, including de-escalation	Add peer duty to intervene and complementary non-retaliation and reporting requirements	Administrative Order 2020-18
APD SOP .3010 Use of Force	✓	✓	✓ [1]	✓	✓	✓ [2]
APD SOP .3042 Conducted Energy Weapon	✓	✓				
SOP .3180 Critical Incidents	✓					

1 While PERF's recommendations were crafted to place an emphasis on proportionality, PERF generally does not promote the use of a use-of-force continuum. PERF has found that while such a continuum helps officers in the decision to escalate force, they do not promote sufficient guidance in de-escalating a given encounter. PERF recommends the adoption of a critical decision-making model (CDM) to aid officers. Please refer to the Use of Force Review Report for a discussion on the CDM.

2 PERF suggests a modification to AO 2020-18's requirement that all uses of deadly force are to be reported to the Citizens Review Board. PERF's Use of Force Review Report recommends the creation of a Critical Incident Review Board, headed by a deputy chief, that reviews all serious uses of force by APD members. This proposed board could include civilians as part of the review process.