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21CP is pleased to submit its third status update, including summaries of 21CP's ***preliminary recommendations***, on the progress of this engagement as we enter Phase Three of the Project Plan. This document is intended to provide a preliminary overview of where 21CP's evaluation is heading – and what will receive a fuller treatment and explanation in the context of 21CP's upcoming final report.<sup>1</sup>

As reported in prior status updates, Phase One was principally targeted at gathering initial information from the City, Oklahoma City Law Enforcement Policy Task Force (Task Force), Oklahoma City Community Policing Working Group (Working Group), and the City's internal Oversight Committee; having initial meetings with key stakeholders in those same groups; and gathering names and contacts of community groups to begin the outreach scheduled in Phase Two. In Phase Two, 21CP has reviewed current policies and practices of the OKC Police Department, conducted extensive engagement with community groups, the Task Force, the Working Group, and the Oversight Committee, and has begun the work on the community survey with partner the ETC Institute. Through these processes, 21CP is driving towards solutions in OKC.

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<sup>1</sup> The project schedule anticipates a final report delivered on 12/15/21, but as discussed in the last status update, 21CP believes the timeline should be shortened and is using 9/30/21 as a target deliverable date.

Phase Three is a development phase, which takes the recommendations and vets them against the City budget process, available community resources, utilizes a cost benefit analysis, and offers a “clear, actionable playbook for proposed reforms.” Therefore, the initial broad-based recommendations that are offered today will be discussed thoroughly to ensure a reasonably feasible path forward. Additionally, we fully anticipate that the recommendations may change and that some may be eliminated even as others are added.

### A. Developing the Recommendations

This project has eight categories for review, the first two of which are being reviewed by the Task Force and the last six by the Working Group. Police Officer Access to Mental Health Services was primarily reviewed by Code4, an independent consulting group and the Expansion of Law Enforcement Homeless Outreach Initiatives was part of a separate Mayor’s Task Force; 21CP was asked to review the outcomes of these processes and make recommendations as necessary.

Task Force	Law Enforcement De-escalation Policy	
	Independent Law Enforcement Accountability to the Community	
	Law Enforcement Training in Crisis Response	Working Group
	Alternative Response to Mental Health Calls	
	Law Enforcement Focus on Youth Outreach	
	Neighborhood Safety/Violence Interruption Program	
Code4	Police Officer access to Mental Health Services	
Homelessness Task Force	Expansion of Law Enforcement Homeless Outreach Initiatives	

That being said, there is overlap between the areas and, as is always the case, issues in policing do not necessarily lend themselves to discrete categories.

Therefore, the development of the initial recommendations stems from work with the Task Force, the Working Group, direct community engagement, review of reports from Code4 and the Mayor's Task Force on Homelessness, discussions with the OKCPD, and a review of national best practices in a variety of areas. Ultimately, the recommendations below are made by 21CP, informed by all of these stakeholders. However, although the project requires development of evidentiary support, including presentation of community perspectives and citation to research and data **in the final report**, the recommendations here are presented in summary format. This will undoubtedly lead to questions of "why" or "why not?" regarding what was or was not included at this point. **The response is: be patient.** Determining feasibility in Phase Three is a critical part of this process. What works in one jurisdiction may not work in another depending on both City resources, existing laws, and available resources to support the City.

Additionally, we often run into the problem of balance with preliminary recommendations. Some recommendations are partially fleshed out with supporting evidence, others are not. In the past we have debated whether to strip all recommendations of commentary and just present in bulleted form; here, we have chosen to add information where we have it sufficiently developed and leave others without commentary. Again, please recognize that the final report, once the recommendations are finalized, will be fully supported, with additional context. In short – we will connect all the dots during the next phase.

Although the recommendations are made by 21CP, we do not dismiss the perspectives and stated goals of the Task Force, the Working Group, or the many community voices. As such, we include initial recommendations that while we cannot conclusively recommend at this point, warrant inclusion in Phase Three. We believe that ultimately, if we cannot support a path forward that community has advocated for, we should explain why in the end.

Finally, these are not all of the final recommendations. As we turn to feasibility and continue to examine policy, practices, and resources, we will identify additional areas of

change. Similarly, we may remove recommendations that we determine are not feasible. And perhaps most importantly, we will triage the recommendations so that the City has guidance on what is immediately implementable, what requires some preparation, and what are longer term goals.

## **B. Initial Recommendations**

### **1. Law Enforcement De-escalation Policy (De-escalation<sup>2</sup>).**

At the outset, we note that the engagement called for an examination of de-escalation “policy.” This potentially narrow focus on the policy – which many stakeholders agreed appeared to be in alignment with best practices<sup>3</sup> – risked missing the point. In 21CP’s experience, there are often critical differences among what a Department says that it does, what it *actually does*, and what it *should do*.

As such, as discussed with the Task Force and Working Group, the concept of de-escalation should be thought of as a core philosophy and approach to engagement and core operations, rather than a policy that exists in a vacuum. Some of the recommendations below address the specific policy, but more overlap significantly with the Alternative Response to Mental Health calls and Training in Crisis Intervention sections below in an effort to drive towards comprehensively thoughtful policing.

Our recommendations below do not imply that the de-escalation policy is somehow holistically deficient or somehow unlawful<sup>4</sup>. Instead, strive to suggest policy

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<sup>2</sup> Although this report is presented by topic area, many recommendations overlap and therefore we indicate the areas the recommendation addresses in parentheses.

<sup>3</sup> The OKCPD highlights its approach to de-escalation: “The Oklahoma City Police Department has had a formalized de-escalation procedure since 2017. This procedure requires the use of de-escalation on every use of force. De-escalation is evaluated independent from the use of force itself to determine if appropriate tactics were used to try and diffuse the situation.” <https://www.okc.gov/departments/police/about-us/okcpd-policy-and-procedure-manual/8-cant-wait>. Several stakeholders found this frustrating, arguing that better outcomes should come from policies and training aligned with best practices.

<sup>4</sup> All of the recommendations in this report come from national best practices, not a legal determination of any sort. In fact, departments are not well-served by policies that operate on

recommendations that provide critical guidance to officers and transparency to the community, both of which enhance legitimacy.

***Recommendation No. 1.*** De-escalation should be elevated to the policy level to highlight it as a core department value. (De-escalation).

The OKC Operations Manual is divided into Policies, Procedures, and Rules.

Policies consist of, “principles and values, which guide the performance of a Department activity. Policy is not a statement of what must be done in a particular situation; rather, it is a statement of guiding principles, which should be followed in activities, which are directed toward the attainment of Department objectives.”

A Procedure, “is a preferred and expected method of performing an operation or a manner of proceeding on a course of action. It differs from policy in that it directs action in a particular situation to perform a specific task within the guidelines of policy. Both policies and procedures are objective oriented; however, policy establishes limits of action while procedure directs response within those limits.”

Finally, a Rule, “is a specific requirement or prohibition, which is stated to prevent deviations from policy or procedure.”

This form of guidance to officers is needlessly complex and contributes to the reason for the Department’s six-hundred- and twenty-six-page Operations Manual. In practice, the distinctions between Policies, Procedures, and Rules appear muddy, with granular issues such as uniforms and restrictions on Secondary Employment placed at the Policy level. In contrast, de-escalation appears as a Procedure.

Although 21CP recommends globally that the Operations Manual be collapsed into clear policies that incorporate the value, purpose, and procedures on how to follow any given policy, at the very least de-escalation should be included as a core principle and value,

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the “Constitutional floor” or simply provide requirements for legal sufficiency. Just because something is technically lawful does not mean that it should happen or be encouraged. Good policies should provide specific guidance to officers to act in a manner that keeps them well above any legal concerns and in alignment with department and community values.

which it is not. While functionally this may not matter as officers are accountable to all aspects of the Operations Manual, clearly designating de-escalation as the centerpiece of police engagements at the highest tier of standards under the Policy Manual sends a strong departmental signal, both internally and externally.

**Recommendation No. 2.** OKCPD should revise its Use of Force policy to include levels of reporting and review based on the severity of the use of force. By broadly categorizing uses of force, the department can ensure that appropriate resources are directed to critically analyzing each use of force incident. (De-escalation).

**Recommendation No. 3.** The department should formalize and strengthen its Force Review Board to holistically review uses of force for lessons learned, including policy, training, supervision, and equipment, and de-escalation. (De-escalation).

Currently, OKCPD utilizes a Use of Force Screening Committee, which, as explained in the Operations Manual, is:

...responsible for reviewing all uses of force for compliance with written directives. The Use of Force Screening Committee is also responsible for reviewing all intentional uses of vehicles as force, such as instances of ramming. The Use of Force Screening Committee shall consist of three majors assigned by the Chief of Police on a rotating schedule<sup>5</sup>.

The department should formalize this review process and ensure that representatives from disciplines such as dispatch, training, and crisis intervention are present and that the review process is not just policy compliance, but a complete review of the incident to find any lessons that might improve outcomes in future events. We understand that some of these disciplines are included in the current committee reviews, but they should be enshrined in policy to ensure consistency and continuity moving forward. For more serious uses of force, the department should consider adding a civilian observer to witness the review and provide community perspectives.

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<sup>5</sup> OKCPD 160.40.

Recommendation No. 4. OKCPD should provide publicly-facing aggregate statistics – in dashboard and raw format - of officer activities, including use of force. (De-escalation).

Recommendation No. 5. OKCPD should shorten the waiting period for interviewing officers who have been involved in an officer involved shooting or use of force incident. Ideally, officers would be interviewed before end of shift in most circumstances. (De-escalation).

Recommendation No. 6. OKCPD should prohibit officers from viewing video evidence before providing an interview in critical events, such as officer-involved shootings. This change needs to be balanced with an understanding that what any officer perceived will not match up perfectly with video evidence. (De-escalation).

Recommendation No. 7. The OKCPD and the City Council should consider increasing the budgeted numbers of officers trained in CIT based on the frequency of calls for service that require that form of response. (De-escalation/Alternative Response).

There was a lot of discussion at the Task Force and Working Group about the number of fully trained CIT officers available to the Department and how they are deployed within the districts. While all officers receive 24 hours of mental health training<sup>6</sup> with two-hour annual refresher training, the 40-hour class is more specialized and comprehensive. Some were concerned about the “premium pay” associated with CIT officers and there was discussion about the current 158 authorized CIT positions (not all of which are filled). In presentations, OKCPD noted that CIT International recommends 20-25% of the department be CIT officers; however, in follow-up discussions, OKCPD clarified that this was a floor, not a ceiling, and that having more CIT officers could only benefit the department and the community. There was acknowledgement from all stakeholders that forcing unwilling officers to become CIT officers would be counterproductive (although others noted that officers unwilling to pursue this skill may not be appropriate officers for the 21<sup>st</sup> Century). However, there was also agreement that allowing all who want to be CIT officers to have the opportunity was a good idea. We agree - this would ensure

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<sup>6</sup> Many departments only offer an eight-hour mental health “first aid” class to all officers, so the expansion to 24 hours is already closing the gap between all officers and CIT officers.

public safety and de-escalation through appropriate law enforcement mental health response to those in crisis.

**Recommendation No. 8.** The City should consider preference points for new applicants to the Department with mental health experience, certifications, or degrees, or social work experience (De-escalation /Crisis Training/Alternative Responses).

**Recommendation No. 9.** The City should consider creating a Crisis Intervention Committee to focus on mental health response city-wide to address ongoing needs of the OKC community. (De-escalation/Crisis Training/Alternative Responses).

Many jurisdictions have benefited from the creation of a multi-disciplinary and interagency advisory committee composed of regional mental and behavioral health experts, social service providers, clinicians, community advocates, academics, other law enforcement agencies, the judiciary, and other stakeholders in the mental health/crisis areas, to coordinate efforts to address these regional issues.

This committee could provide updates on available resources and programs, review policies and data to assess crisis response, and essentially get all stakeholders pulling in the same direction. While OKCPD would be a necessary partner, they are only one of many and should remain open to alternate ways of thinking.

This body could also serve to provide expert advice on the best form for the alternative response model for mental health calls as the City explores options.

Also, cross-referencing the recommendation to strengthen the Force Review Board, a mental health provider from the committee mentioned above could be a part of the board to address crisis intervention.

## ***2. Independent Law Enforcement Accountability to the Community (Accountability).***

Given the inherent skepticism that many have to the notion of the police policing themselves on matters of misconduct, many jurisdictions use some mechanism of



independent oversight. The National Association for Civilian Oversight of Law Enforcement identifies three major classes of oversight models: (1) an auditor/monitor model, which either “review[s] . . . the completeness and thoroughness of Internal Affairs investigations” or, alternatively, involves an outside individual or entity “monitoring . . . entire internal investigations from beginning to end” to ensure fairness, thoroughness, and consistency; (2) an investigative model, in which “[a] civilian[-]led agency investigates complaints of misconduct” themselves; and (3) a review-focused model, in which “[a] civilian board or panel examines the quality of internal affairs and investigations.”<sup>7</sup>

At this time, 21CP makes no specific recommendations here as to the form or structure of oversight – that is necessarily reserved for the feasibility work in Phase Three. We note simply that, to enhance community trust and confidence in the police and to alleviate the concerns of some community members about the legitimacy of police investigating police, that OKC should strengthen its oversight mechanism for its internal investigations of officer performance. Some members of the Task Force have stated a preference for a Civilian-led model, with primary authority to investigate complaints against police officers.<sup>8</sup> While not exclusive of a civilian-led investigatory model, 21CP does not support any model that will divest the Chief of Police of final disciplinary authority – ultimately, the Chief needs to be able to manage the police service, and the Chief must be held accountable for doing so. As we move into Phase Three, we will examine the feasibility of the different models and make additional recommendations as necessary.

**Recommendation No. 10.** Oklahoma City should assess the membership design of the Citizens Advisory Board (CAB), including who sits on the CAB, the transparency of their appointments, and establish term limits. (Accountability).

While the Task Force and Working Group were not satisfied with the current status of the CAB, there was a general sentiment that it was not necessary to recreate the wheel. Discussions were focused on transformation of the Board, not elimination of the CAB.

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<sup>7</sup> Office of the Police Monitor, City of Austin, Texas, *Preliminary Police Oversight Analysis 4* (2018), <http://www.austintexas.gov/edims/document.cfm?id=301093>.

<sup>8</sup> Civilian Oversight Subcommittee History, Principles and Recommendations, Task Force Accountability Subcommittee Recommendations Letter.

However, there was criticism of the lack of transparency for appointments, concerns that some of the current members were “defenders of the status quo,” the lack of term limits, and a perception that despite the level of power granted even under the current Charter, the CAB was simply not exercising its power to maximal effect. Moreover, many expressed concern that the CAB’s membership did not reflect, and was not accountable to, many in the community.

**Recommendation No. 11.** The City should consider changing the scope and authority of the CAB to increase its ability to influence accountability measures for police officers. (Accountability).

Some possible changes to explore in Phase Three include:

- a. CAB should have greater access to OKCPD records to ensure visibility into operations.
- b. The City should consider giving the CAB a direct investigatory role into officer complaints, including whether that role should include subpoena authority.
- c. How the CAB’s arbitration process can be modified so that the recommendations offered are taken seriously prior to an officer’s return to work—many believe the CAB assessments/recommendations are not accepted by the police department.
- d. The CAB should be able to review and influence policy creation in order to help mitigate problematic findings that are regularly presented to the group

**Recommendation No. 12.** OKC should engage in a comprehensive education campaign to highlight the work and authority of the CAB. (Accountability).

Many lamented that their constituents and members of the general community had no idea what the CAB was or what authority it had. As such, the City should breathe life into it with a strong information campaign.

This campaign should include a public education process that gives citizens a clear understanding of how they may make a formal complaint against the OKCPD and its employees.

**Recommendation No. 13.** The City should add an electronic way to anonymously file a complaint, such as through a web form. (Accountability).

Although anonymous complaints are permitted, doing so requires calling, mailing, or dropping off the filled PDF complaint form. In keeping with this concept, the end affirmation and signature line on every page of the complaint form should be removed.

### **3. Law Enforcement Training in Crisis Response (Crisis Training).**

There was significant discussion, particularly in the Working Group, about the length and frequency of crisis response training. Similar to bias-free policing trainings, it is possible for CIT trainings to become formulaic and stale. Additionally, there is the challenge of ensuring all officers are trained in the subject while also striving to provide new information for experts in the discipline to grow and develop. These issues, combined with the steady influx of raw recruits creates training complexities.

**Recommendation No. 14.** OKCPD should develop a specific and comprehensive training plan for ensuring that CIT officers have sufficient support and training both in the short-term and throughout their careers. (De-escalation/Crisis Training/Alternative Responses/OSW).

Discussions with the Reality Based Training Unit shed light on OKCPD's recent approach to training and development. What started as a return to duty program (ensuring that officers are ready to resume work after a critical event, such as an officer-involved shooting), is becoming a scenario-based training unit focused on "de-escalation, mentally challenged individuals, duty to intervene, officer self-care, and sanctity of life."

President Obama's Task Force on 21st Century Policing emphasized the "need for realistic, scenario-based training to better manage interactions and minimize force . . . ."<sup>9</sup> As the Leadership Conference for Civil Rights has recommended, "[o]fficers should practice, in interactive environments . . . de-escalation techniques and threat assessment strategies that account for implicit bias in decision-making."<sup>10</sup> Rather than passively

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<sup>9</sup> *Final Report of the President's Task Force on 21st Century Policing* 52 (2015).

<sup>10</sup> The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 143 (2019).

consuming information about law or policy, officers need the opportunity to learn, apply, and practice decision-making skills with realistic contexts. In the same way that continuing training for pilots puts them in flight simulators to practice the response to real-world flight scenarios,<sup>11</sup> effective law enforcement training presents real-world scenarios and asks officers to respond. Many practical strategies grounded in adult learning techniques are effective police instruction, including; verbal scenarios, group discussions analyzing officer performance from an incident captured on video, role playing, demonstration, group analysis of scenario performance, “teach-backs” in which students provide instruction to fellow students on designated topics, and many others.<sup>12</sup>

The Reality Based Training Unit appears to be a strong start in the right direction. The unit is exploring sector level small team training, which will help supervisors and sector-level patrol units to train together and thereby learn their strengths and weaknesses. Such an approach is valuable, as often trainings draw from different sectors to preserve services to the public. OKCPD is using overlap days to keep teams together without compromising service.

#### **4. *Alternative Response to Mental Health Calls (Alternative Response).***

Communities across the country are exploring the best systems for responding to individuals in crisis and the best ways that police can help support successful outcomes. Dominant models include:

- The Crisis Intervention/“Memphis Model.” Officers receive training on responding to individuals in crisis, with some specially-trained “CIT officers” being specially dispatched to calls implicating behavioral health issues.<sup>13</sup>

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<sup>11</sup> See, e.g., Marcel Bernard, “Real Learning Through Flight Simulation: The ABCs of ATDs,” FAA Safety Briefing (Sept./Oct. 2012), [https://www.faa.gov/news/safety\\_briefing/2012/media/SepOct2012ATD.pdf](https://www.faa.gov/news/safety_briefing/2012/media/SepOct2012ATD.pdf).

<sup>12</sup> NHI Instructor Development Course 1, 2, <https://www.nhi.fhwa.dot.gov/downloads/freebies/172/pr%20pre-course%20reading%20assignment.pdf> (last accessed Jan. 17, 2021).

<sup>13</sup> See, e.g., Amy C. Watson & Anjali J. Fulambarker, “The Crisis Intervention Team Model of Police Response to Mental Health Crises: A Primer for Mental Health Practitioners,” 8 *Best*

Steering committees of community stakeholders, including social service providers, clinicians, individuals of affected populations, and other community representatives, come together to discuss system-wide responses to mental health, substance abuse, and other behavioral issues. OKCPD utilizes this model for its CIT program.

- Community Co-Response. Officers and specially-trained clinicians or social workers respond to calls involving behavioral health issues. These non-sworn specialists and officers are specially dispatched as primary responders in situations that may involve individuals in crisis. “Thus, co-response teams go beyond training police officers by integrating officers with trained professionals who specialize in behavioral health problems.”<sup>14</sup> Programs launched in Colorado<sup>15</sup> and Dallas<sup>16</sup> are examples.
- Primary Community Response/“CAHOOTS”/STAR Model. Social service providers or clinicians are dispatched in teams, without police, as the primary response to individuals in crisis where the call indicates that the individual is not posing a threat. Police are dispatched as and when these primary, community-based responders require such assistance. The City of Eugene, Oregon has for three decades dispatched “two-person teams consisting of a medic and a crisis worker who has substantial training and experience in the mental health field,” rather than immediately sending police, to “deal with a wide range of mental health-related crisis, including conflict resolution, welfare checks, suicide threats, and more . . . ,” which has been associated with

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*Practices in Mental Health* 71 (2012); University of Memphis, CIT Center, <http://www.cit.memphis.edu/overview.php?page=2> (last visited Jan. 27, 2021).

<sup>14</sup> Katie Bailey, et al, “Barriers and Facilitators to Implementing an Urban Co-Responding Police-Mental Health Team,” *6 Health and Justice* 21, 22 (2018).

<sup>15</sup> Colorado Department of Human Services, *Co-Responder Programs*, <https://cdhs.colorado.gov/behavioral-health/co-responder> (last visited Mar. 6, 2021).

<sup>16</sup> Press Release, “Dallas Launches Coordinate Response Program for Behavioral Health Calls” (Jan. 22, 2018), [https://mmhpi.org/wp-content/uploads/2018/04/01.22-RIGHTCareTeam\\_PressRelease\\_FMT\\_FINAL2.pdf](https://mmhpi.org/wp-content/uploads/2018/04/01.22-RIGHTCareTeam_PressRelease_FMT_FINAL2.pdf).

positive outcomes and significant cost savings to the City.<sup>17</sup> Similarly, the Denver STAR pilot program uses a paramedic/mental health response team to respond to non-violent mental health calls<sup>18</sup>. New York City launched a similar program late last year, which has initial promising results.<sup>19</sup>

As it appeared from discussions with OKC stakeholders that the critical discussion going forward is about *how* to create alternative responses to mental health and crisis calls, rather than *whether* to do so.

There was a lot of discussion about what form such an alternative program should take as well as the City's current collaboration with Northcare, which is a referral follow-up service to engage people in crisis after police have made the initial contact and referred the person to Northcare. The referral can occur whether or not the person has been involuntarily committed. Members of the Task Force and Working Group advocated for some form of an expansion of the Northcare pilot that would replicate the STAR model in OKC. It may well be that such a program would be very effective in OKC. However, some Working Group members expressed concern about the perception of Northcare in the community, reflecting that where smaller, more localized care providers could be engaged, there would be a more trusting relationship between various communities and the service offered. Regardless, there was agreement that if a pilot was created, it would need to incorporate data collection, tracking, and measurable outcomes.

**Recommendation No. 15.** The City should issue a Request for Information to determine what community resources exist and what capacity they have for an alternative response model. (Alternative Responses).

As it stands, there are unknowns about what resources exist in OKC to form the basis of a community response model. As stated, it may be that the pilot program with Northcare could be the model moving forward and if that pilot is viable, (budget and other legal challenges aside) there is no reason not to test those waters. However, other than

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<sup>17</sup> White Bird Clinic, *What is Cahoots?* (Sept. 29, 2020), <https://whitebirdclinic.org/what-is-cahoots/>.

<sup>18</sup> <https://www.jsonline.com/story/news/local/milwaukee/2021/05/27/what-know-denvers-911-alternative-police-star-mental-health/5210500001/>

<sup>19</sup> <https://www.npr.org/2021/07/23/1019704823/police-mental-health-crisis-calls-new-york-city>

Northcare, no other community-based resources capable of taking on this work were identified.

An RFI is the appropriate exploratory tool when you know the problem – we want an alternative to police responding to non-violent mental health calls – but are open to solutions to the identified problem.<sup>20</sup>

**Recommendation No. 16.** As OKC potentially invests in a new records management system, part of the requirements should be that it connects to dispatch and allows for coordination to respond to mental health issues, identifying frequent callers and potential needs or specialized responses that they require (Alternative Response/Crisis Training/De-escalation).

As OKCPD develops its Record Management System (RMS), which is currently planned, the Department and the City should ensure that gathering and tracking crisis data is fully baked into the new system. This information will help guide deployment needs and guide specific interactions by providing information before the police come into contact with an individual in crisis.

Currently OKCPD tracks crisis response, attempted suicide calls, and dispositions – whether an arrest or custodial intervention occurred. The copy we received was an Excel spreadsheet. While laudable, the level of detail that can be collected for crisis calls should be far greater. For example, tracking behavioral information for “frequent flyers” requiring mental health contacts can inform a thoughtful police approach. Knowing an individual’s service provider, their triggers, and methods of successful resolution is important for any responding officer. By recording behavioral responses rather than diagnoses, potential HIPPA entanglements can be avoided.

Additionally, OKC could consider creating a public-facing portal for families to enter information about problematic behavioral issues in the family. This could work similarly to the current OKC Storm Shelter Registry<sup>21</sup> and allow the public to enter family demographics and special needs into the system through a public database that would

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<sup>20</sup> <https://rfp360.com/rfi-rfp-rfq/>

<sup>21</sup> <https://app.okc.gov/applications/stormshelter/Forms/Welcome.aspx>

be linked to 911 dispatch so that when and if that family calls 911 there can already be useful response data in the system.

**Recommendation No. 17.** Community training/public education on how best to call for emergency needs in a mental health crisis in order to provide Dispatch and subsequently the law enforcement or first responder the best information to mitigate the problem upfront. (Alternative Response/Crisis Training/De-escalation).

As part of or separate from the above recommendations, a comprehensive community education plan can help people know what to expect with a police response and what information will be most useful for dispatch and responding officers.

**Recommendation No. 18.** Consistent with the above, 911 dispatchers should continue training in crisis intervention, continue to have access to updated information on which officers are CIT, and regularly revisit their script protocols for crisis events to learn, along with the department, the best approaches based on outcomes. (Alternative Response/Crisis Training/De-escalation).

##### ***5. Law Enforcement Focus on Youth Outreach (Youth)***

Law enforcement engagement with youth is a critical component to any outreach or operations plan. This is an age where mentorship and coaching in the area of responsible decision making is critical. This is often too where a positive or negative interaction with police officers can have a long-lasting effect on a young person's psyche and future interaction with law enforcement, particularly in the BIPOC communities. Especially considering the fear many young people have of law enforcement based on media coverage, or unfortunately, their own personal observation of police misconduct. Therefore, it is important that law enforcement is intentional in how it prepares its members to engage with youth. A first step is acknowledging and respecting their voice, which can be difficult for any adult, particularly one trained to command and control all situations. Departments must also ensure bias plays no role in their engagement.

**Recommendation No. 19.** Create a Youth Advisory Board that has direct access to the Chief in monthly meetings. (Youth/Violence Interruption).



The Youth Advisory Board can serve to define goals for department engagement with youth. Meetings should be in the community, as youth will not likely come to the department, and representatives of OKCPD, up to and including Command Staff and the Chief, should regularly attend. This process could include youth dialogue circles on a regular basis in every district, with active OKCPD listening and supported by community-based mediation/facilitation.

**Recommendation No. 20.** OKCPD should consider holding special sessions of the Community Police Academy for Youth. (Youth).

**Recommendation No. 21.** Ensure that current Youth Outreach Programs are funded, remain a department priority, and part of a public information effort. (Youth/Violence Interruption).

In our discussions with community, there was little understanding of current efforts by the department to engage Youth. At the same time, the department is making extensive efforts to reach to Youth, including the Youth Enrichment Services (YES) program, formerly the Truancy Unit, that seeks more holistic solutions for kids struggling in school and the Family Awareness and Community Teamwork (FACT) program that targets gang violence. We conclude there is a disconnect and OKCPD should increase awareness through an information campaign, continued engagement, and by ensuring the programs are funded and staffed so that the experience in the field matches the commitment on paper.

#### ***6. Creation of a Neighborhood Safety/Violence Interruption Program (Violence Interruption)***

The Working Group received information on current programs and partnerships to combat violence, and discussed OKC resources. However, we note that the Working Group still has some work to do in this space, which may inform additional recommendations.

**Recommendation No. 22.** The City should create an exploratory committee to vet community resources that have resources critical to violence intervenor programs as a core building block of their programming. (Youth/Violence Interruption).

Combatting violence can be a very contentious place for law enforcement and communities of color. While everyone wants a safe neighborhood, aggressive tactics, allegations of unconstitutional policing, police involved shootings and over-incarceration of people of color breeds distrust. Many crimes, particularly those that include violence, are solved by community members stepping forward with information. This cooperation decreases significantly when procedural justice is not a part of a department's core principles and shows up in operations. Given that this reciprocal relationship is a critical component to all law enforcement activities, many cities have turned to a model that acknowledges these realities. Many cities use models of "trusted" community members to engage and deescalate tensions to decrease violence. These programs are called violence interrupter programs. Where by community members, usually formerly criminally-involved, work to proactively stop violence before it happens by using their credibility in the community.

Street outreach is an important component of violence – especially gang-based violence – strategies, but defining the approach and the community capacity is critical.<sup>22</sup> Successful violence interruption programs do not always use the same combination of approaches and outreach activities, mentorship approaches, or case management approaches have had different efficacy in different jurisdictions. However, it is clear that best outcomes are achieved when the police, the community, and other resources work collaboratively in a combination of engagement, opportunities for Youth, and enforcement priorities.<sup>23</sup> As such, jurisdictions looking to establish violence interruption programs should focus on answering foundational questions<sup>24</sup>:

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<sup>22</sup> National Council on Crime and Delinquency, *Developing a Successful Street Outreach Program: Recommendations and Lessons Learned*, 2009; See also OPHS Violence Prevention Toolkit, 2019.

<sup>23</sup> OPHS.

<sup>24</sup> National Council on Crime and Delinquency, *Developing a Successful Street Outreach Program*:

- 1) **What is the specific purpose and the target audience of the outreach program?**  
Reduce Gang and/or Street Violence? Reduce gang membership? Connect at-risk youth to positive opportunities?
- 2) **How will outreach be conducted?** Long-term relationship building and linking youth to prosocial services and activities? Conflict mediation and high-risk situations?
- 3) **How is the program staffed?**
- 4) **What methods are used to recruit, hire, train, and retain staff?** Official and “neighborhood” background checks; drug testing; tolerance of misbehavior or recidivism on part of staff; hiring panels; willingness to work with law enforcement; workers safety; fair wage and benefits; apprenticeships and volunteering; management and supervision; training; passion and long-term commitment.
- 5) **Which type of agency or organization should host a street outreach program?**  
Nonprofit, community, and grassroots organizations; city and county agencies; central agency, with workers located in CBOs in particular neighborhoods; faith-based organizations.
- 6) **Which partnerships are essential, and how can they be developed and maintained?**  
Police Departments; probation, parole, and correctional facilities; schools; hospitals; community-based organizations/service agencies; faith-based organizations; business community.
- 7) **What data will be collected and how will it be used and evaluated?**
- 8) **How will funding be secured?**

Similar to our recommendations around community-based Alternatives to Mental Health calls, it is necessary to assess what resources exist and what community-based capacity there is to interrupt violence. The committee might consist of government representatives, including executive level and health and human services, two community-based organizations run by or assisting formerly incarcerated citizens, two service providers that serve communities with high levels of violence, representative of a hospital that cares gunshot victims. The group should help determine the scope and purpose of any program, how long the program will be in effect, whether the program will directly engage in mediations, staffing requirements and qualifications, and what community-based resources exist to support this effort.

Recommendation No. 23. Once the exploratory committee provides a program design, the City should issue an RFI to identify a resource. (Youth/Violence Interruption).

### **7. Police Officer access to Mental Health Services (OSW)**

Policing can be a dangerous and unpredictable job. Officers are expected to respond to address situations that others have not been able to address themselves – and to resolve situations in which people are often at their worst or most vulnerable. Police Officers are called to handle problems and address people that the remainder of the social service fabric has forgotten, ignored, or left behind leaving officers at times to feel helpless and lost in the best way to serve the community.

As a result of performing their everyday duties, police officers can experience unique physical and mental stress.<sup>25</sup> For instance, in 2016, more officers died of suicide than any single cause of death in the line of duty – and almost as many died from suicide as all other causes combined.<sup>26</sup> Officers exhibit symptoms of post-traumatic stress disorder (PTSD) at a higher rate than the general population.<sup>27</sup>

Ongoing stress and trauma affect not just officers but their families and, indeed, the communities that they serve. Mental and physical health challenges often result in increased administrative costs from absenteeism, increased use of workers' compensation and sick days, and more frequent use of early retirement. Likewise, "[w]hen exhausted, officers are unable to effectively communicate with community members [this] may even incite agitation among them."<sup>28</sup> "Officers who are equipped

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<sup>25</sup> Deborah L. Spence, et al, *Law Enforcement Mental Health and Wellness Act: Report to Congress* (2019).

<sup>26</sup> John M. Volanti, et al, "Law Enforcement Suicide: A National Analysis," 15 *International Journal of Emergency Mental Health & Human Resilience* 289, 289 (2013).

<sup>27</sup> National Alliance on Mental Illness, Advocacy, Crisis Intervention, Law Enforcement Officers, <https://www.nami.org/Law-Enforcement-and-Mental-Health/Strengthening-Officer-Resilience> (last visited Mar. 3, 2021); Ellen Goldbaum, University of Buffalo, "Police Officer Stress Creates Significant Health Risks Compared to General Population, Study Finds," (July 9, 2012), <http://www.buffalo.edu/news/releases/2012/07/13532.html>.

<sup>28</sup> Police Executive Research Forum, *Building and Sustaining an Officer Wellness Program: Lessons from the San Diego Police Department* 7 (2018).

to handle stress at work and at home . . . are more likely to make better decisions on the job and have positive interactions with community members.”<sup>29</sup>

Given the importance of officer wellness, President Obama’s Task Force on 21st Century Policing recommended:

Support for wellness and safety should permeate all practices and be expressed through changes in procedures, requirements, attitudes, and behaviors. An agency work environment in which officers do not feel they are respected, supported, or treated fairly is one of the most common sources of stress. And research indicates that officers who feel respected by their supervisors are more likely to accept and voluntarily comply with departmental policies. This transformation should also overturn the tradition of silence on psychological problems, encouraging officers to seek help without concern about negative consequences.<sup>30</sup>

Officer wellness can be supported through a variety of mechanisms within a police organization:

There is clearly a continuum of mental health and wellness strategies, programs . . . that begins with recruitment and hiring and goes through retirement. It includes proactive prevention and resiliency building; early interventions; critical incident response; treatment, reintegration; and ongoing support for officers, staff members, and their families.<sup>31</sup>

The City contracted with Code4, an independent consultant, to assess the sufficiency of OKCPD’s Officer Safety and Wellness (OSW) programs. The assessment was delivered and OKC has taken the recommendations seriously and has started to implement a

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<sup>29</sup> The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 312 (2019).

<sup>30</sup> *Final Report of the President’s Task Force on 21<sup>st</sup> Century Policing* 62 (2015).

<sup>31</sup> 21CP Solutions, U.S. Department of Justice, Office of Community Oriented Policing Services, *Law Enforcement Mental Health and Wellness Programs: Eleven Case Studies* (2019), <https://cops.usdoj.gov/RIC/Publications/cops-p371-pub.pdf>.

number of these recommendation. 21CP believes that at a high level, OKCPD is well-ahead of the national curve with its wellness programs and that the department is well-served by the Code4 assessment. As such, while we recommend that OKCPD continue its implementation, we also highlight some of the areas recommended by Code4 as priorities.

**Recommendation No. 24.** OKCPD should continue to implement the Code4 recommendations in full. (OSW).

The department has been making remarkable progress and there is strong leadership in the Officer Wellness Unit. However, some of the Code4 recommendations require time in development and implementation and on-going commitment in terms of funding and staffing. OKC should hold the course and fully implement the comprehensive plan.

**Recommendation No. 25.** Require each member of Peer Support to complete a monthly stat sheet that documents number of contacts, type of service needed, referrals given, and any follow-up service. (OSW).

This goal may be satisfied by the app being currently developed with the LEMHWA grant received by OKC in 2020. The app is currently in development and will serve as a real-time mental health support and services toolkit for officers

**Recommendation No. 26.** OKCPD should formalize the recommendation for a Hospital Response Team. (OSW).

The Department, in an effort to continue the positive growth of the Wellness Unit should document procedures for how to best respond during to a crisis in which an officer is injured. This does not requires a policy, but at least a unit-based SOP setting out the best practices for hospital response and care. This will support continuity when inevitable unit transitions occur.

**Recommendation No. 27.** Develop a comprehensive Post Critical Event Guide. (OSW).

The Wellness Unit has a sophisticated response model to support officers involved in critical events. Their system is informed by best practices and has a clear pathway of

offering officers' mental health first aid, physical health treatment, family notification, and resources for mental health care. While officers are provided with sheets about possible symptoms of PTSD, the officers and their families would be well served to receive a timeline and process guide to next steps – mandatory leave, fitness for duty, Reality-Based Training Unit (RBTU) training requirements, and investigations.

**Recommendation No. 28. Expand the number of fulltime Licensed Professional Counselors available to OKCPD staff members. (OSW).**

Nationally police departments from Los Angeles to Nashville have developed Wellness Units that also include the hiring of Licensed Professional Counselors (LPC) or Psychologists. Although, once seen as a necessity to the department to manage fitness for duty processes, today these important positions are more readily used as an ongoing mechanism to provide continued mental health care for officers and their families. The LPC position can be used across a variety of operations inside the Department from managing private health data of officers on leave post a critical incident to being an emergency mental health first-aid responder to officers at the scene of an incident. LPC's also may serve as part of the interview team for an officer immediately following an incident and can be a resource touch for families should an officer be hospitalized or in critical condition. LPCs can also lead the Department in informed mental health response training, education around mental health calls and best practices in CIT intervention as well as academy training and family resource education that can provide a broader more holistic response to officer wellness in OKC.

As recommended by Code4, the Department should prioritize the LPC hire immediately with the hiring of at least two LPC position to manage the following:

1. Oversee the confidential management of the data mentioned in recommendation 26 to ensure adequate tracking
2. Serve as a primary responder to critical incidents and be a part of the mental health assessments of officer both during the emergency first aid session and in the days to follow after an incident

**Recommendation No. 29. Create an agency fitness program. (OSW).**

OKCPD should consider a comprehensive approach to supporting officer health, including a consistent policy pertaining to On-Duty Workouts and the possibility of an incentive program for maintaining health standards.

**Recommendation No. 30. Provide continued education and training for the OKC PD staff bi-annually with new and emerging issues and coping skills to growth officer wellness throughout the agency and to build mental resiliency in the OKCPD. (OSW).**

This training should include reminders of the existing resources, their commitment to confidentiality, and encouragement to use the wellness resources. Many anecdotes in the Code4 assessment indicated either ignorance of resources or an apprehension to use them – that must be overcome.

Additionally, officer safety and wellness best practices including tactical breathing, stress reduction and mental health first should be regularly presented as part of the on-going training plan.

**8. *Expansion of Law Enforcement Homeless Outreach Initiatives (Homelessness)***

The Mayor’s Task Force on Homelessness provided the final report to 21CP and the Working Group and presented their findings. As noted by one Working Group member, “there seems to be a need to have services better connected and the need for safer sheltering options,” which is consistent with our observations. A lack of mental health services – coupled with the often-co-occurring conditions of substance use disorder, homelessness, and other conditions of despair – has led to jurisdictions nationwide increasingly relying on police officers to serve as first responders to incidents of behavioral crisis. Discussions about homelessness overlap significantly with considerations of Community Policing and general feelings of safety and order in OKC. Overall, our recommendations around Alternative Responses to Mental Health Calls will apply to homeless response issues. For people experiencing homelessness and addiction or mental health issues, the Crisis Intervention Committee will be the best source of guidance for OKCPD and any police response, if warranted, will be in



alignment with the crisis response. If there is a crime committed, especially a violent crime, a police response is warranted, but diversion into services is likely the proper disposition.

Fundamentally, homelessness is not a policing problem and expanding Law Enforcement Outreach is likely not the proper path. Instead, Working Group members discussed the expansion of the Homelessness Outreach Team (HOT), which works on cleanups in coordination with mental health providers.

**Recommendation No. 31.** As OKCPD creates systemic training for crisis intervention, issues of homelessness should be incorporated to ensure officers are adequately aware of appropriate resources and departmental guidance on use of discretion for low-level offenses. (Crisis Training/Homelessness).

**Recommendation No. 32.** OKC should consider whether to modify ordinances for quality-of-life crimes to individuals experiencing homelessness. (Homelessness).

In recommending consideration of the impacts of quality-of-life offenses on homeless populations, we are not suggesting that people experiencing homelessness are above the law in some way. Instead, we are recommending that criminal enforcement is likely not the best tool to achieve the outcomes the City wants – to get people housed and stabilized. Ideally, the District Attorney would participate in these efforts.

### **C. Working Group, Task Force, and Oversight Committee engagement**

The Oklahoma Working Group, Task Force, and Oversight Committees are the primary touch points for 21CP to understand the concerns of OKC communities and identify additional community groups to be included in the conversation. Since the project kickoff on January 8, 2021, the 21CP team has facilitated Task Force meetings, Working Group meetings, and has met regularly with the Oversight Committee. Focused conversations with most of the Task Force and Working Group Members have also occurred. This has been very helpful at getting a deeper perspective into the issues outside a group setting. With the encouragement of 21CP, the City developed a web-based "[landing page](#)" to provide information and updates on the policing work being done in OKC.

**Task Force.** Responding to the Task Force decision to create space for community perspectives on the Task Force agenda, 21CP has coordinated presentations at the Task Force to provide substantive context and information. The presentations have been balanced with the need to present on project status and updates and move the process forward towards solutions.

Based on a 21CP survey of the Task Force members to define priority topics, two Task Force subcommittees were formed – Accountability and De-escalation – and have been meeting regularly. These smaller groups allow for more time for individuals to speak and we have heard valuable input from members who do not often chose to speak at the full Task Force. At the May 13, 2021, Task Force meeting, 21CP reviewed “themes” in both areas that were drawn from the subcommittees and overall community engagement that formed the basis of some of the recommendations.

**Working Group.** The Working Group has met many times during 21CP’s engagement with OKC and has provided guidance and areas of focus to 21CP. Each member was polled about their interest to meet twice a month as opposed to monthly, and consensus was they would prefer to meet twice monthly. The members were also asked to dive into their ideas around various topics of the Working Group, sharing key insights and early ideas for problem solving and community policing. Working Group members also gave 21CP suggestions for critical community members to meet with in the coming weeks as well as stakeholder groups and valued community-based organizations.

The working group addressed each of their six subjects to identify early recommendations in each space, including a priority and feasibility exercise to identify “low hanging fruit.” The Working Group has been very focused on moving beyond debate to solutions. They have been quick to offer solutions and specifically address their feasibility for OKC by seeking out suggestions for OKC that encompass community policing and care in public safety over the “standard” reforms that may not best serve the OKC community.

Like the Task Force, the Working Group requested or was offered presentations to learn about critical topics, best practices and the current state of Oklahoma City with respect to their various areas of focus.

**Oversight Committee.** The Oversight Committee serves as a backstop to the City to ensure that 21CP is on task – what is generally referred to as Project Management Quality Assurance (PMQA) – and to be the point for the City on providing names and contacts of community groups for outreach. As such, 21CP has regularly reported out to the Oversight Committee and received some suggestions on community groups.

#### **D. Direct Engagement**

Community Engagement is a complex concept and there are differing perspectives about the form and content of how such engagement should be managed. Coming into this project, 21CP was asked to “[i]dentify with the assistance of City staff, the Task Force, and Working Group all community groups necessary to meet and confer with to learn and review current community and law enforcement conditions” and that the Oversight Committee would “provide names and contact information for group contacts. These contacts will be provided as a resource for effective outreach to these groups.”<sup>32</sup> Based on these contract provisions, 21CP surveyed the Task Force, discussed this issue with the Working Group, and asked the Oversight Committee for specific contacts. Members of each proposed community groups for 21CP to reach out to and 21CP began that outreach to those groups. However, it became clear that the provided contacts would be insufficient for adequate engagement and 21CP began to develop its own list of potential contacts and planned a Town Hall event to “shake the trees” to identify others for direct engagement. Additionally, 21CP asked members of the Task Force, the Working Group, and the Oversight Committee to hold listening sessions with their memberships, which has generated some engagement.

#### **Community**

First and foremost, we begin this section with thanks. Thank you to all who have given their time, energy, and voices to this important work. Thank you to all who are exhausted

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<sup>32</sup> Professional Services Contract.

by “engagement,” but persist. And thank you to those who have taken the chance that this process might lead to better results for OKC.

To date, in addition to the engagement with the Task Force, Working Group, and Oversight Committee, 21CP participated in and hosted several virtual events. On April 12, 2021, 21CP hosted a Virtual Town Hall that was attended by over 150 people. Based on contacts obtained through that engagement, 21CP has been directly engaging with members of the self-described activist community.

Previously, 21CP (through Chuck Ramsey, who was invited to be on the panel), participated in a Town Hall event sponsored by the OK Justice Circle, that was attended by over 70 community members.

As we also received guidance to engage with the faith-based community and scheduled four faith-based Town Hall meetings. While these were not heavily attended, they did provide important insights into the faith-based community perspective.

Most recently, 21CP, through Ray Kelly, was able to participate in “Reimagine Community Policing Listening Session,” held by OKC Councilman James Cooper and State Representative Mauree Turner. Previously, 21CP was able to attend the Breaking Bread breakfast on the centennial of the Tulsa Race Massacre. There, Ray Kelly spoke to the 100+ attendees and facilitated a breakout session on police and race dynamics. During this in-person visit to OKC, Ray also met directly with members of the Task Force, with a separate meeting with members of the Accountability subcommittee at Kindred Spirits eatery to discuss future public forums. That group was joined by members of the Urban League.

To date, 21CP has conducted more than ten listening sessions, with more being scheduled. We estimate that over 70 people attended these sessions. Additionally, we have spoken with hundreds of individuals<sup>33</sup>, including community members writ large,

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<sup>33</sup> Throughout this document, we are intentionally not naming the individual community members that we have met with, as some asked for confidentiality. In our final report, we will consider what level of information to provide balancing privacy – which we respect – with the strong interest in thanking those who have contributed their time.

Council Members, State Representatives, Task Force members, Working Group Members, and members of the Oversight committee, as well as members of the police department. We have talked with representatives from BIPOC, LGBTQ, Latinx, Indigenous, School and Youth communities. We have also spoken with mental health professionals, homeless advocates, and other community organizers/activists.

The community groups identified to date (most of which have already been contacted)<sup>34</sup>, include:

A Chance to Change	Intentional Fitness	Oklahoma County Crisis Intervention Center
8th Street Church	ION Mental Health	Oklahoma City Young Democrats, Activist
Academy of Law & Public Safety at Frederick A. Douglass H.S.	It's My Community	Q Space
Alpha Boys Institute	John Marshall High School	Oklahoma Democratic Party, Make It Right Project
Association Oklahoma	Langston-OKC	Oklahoma DOC Offender Services
Autism Foundation of Oklahoma	Latino Community Development Agency	Oklahoma Youth Literacy Program
Avery Chapel AME	Leo's Barbeque	Opportunities Industrialization Centers -OKC
B&B Catering	Loves OKC	OUHSC
Bethlehem Star Baptist Church	LULAC Youth	Pastor of Ebenezer Baptist Church
Bishop	Lynn Institute	Perry Publishing
Black Chamber of Commerce	Mayflower Congregational Church	Polk house
Black Muslims	Mental Health Association Oklahoma	Positive Tomorrows
Black Lives Matter OKC	Mid-Del Youth	Possibilities Inc.
Boys and Girls Club	Millwood Public Schools	Prospect Baptist

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<sup>34</sup> Not all outreach is successful; groups and individuals can always decide not to participate in this process.

Calle Dos Cinco in Historic Capitol Hill	NAACP & Dear J.O.N. (Justice or Nothing)	Prospect Church
Calm Waters	NAACP OKC	Public Defender/TEEM
Centennial Health	NACOK	Southeast High School
CEO of Mental Health Association Oklahoma	Nappy Roots	Spiritual Formation
Citizens Committee for Community Development	National Panhellenic Council OKC	Spring Eternal
Delta Gems	National Women In Agriculture Association	St. Anthony's Behavioral Health
Distinctive Designs Salon & Barbershop	Neighborhood Alliance	St. John Missionary Baptist Church
Dream Action OKC	North East Community Leaders	Stop the Violence OKC
Ebenezer Baptist Church	Northcare	Stronger Together Movement
Fairview Missionary Baptist Church	Northeast Missionary Baptist Church	Tabernacle Baptist Church
Florence's Restaurant	Northeast OKC Renaissance	Tango
Freedom Oklahoma	OK Commission on the Status of Women	Temple B'nai Israel
Frederick A. Douglass Academy of Law & Public Safety	OK County Criminal Justice Advisory Council	Temple Funeral Home
Geronimo's Bakery	OKC Artists for Justice	Unidos en Oklahoma City
Greater Bethel Church	OKC Black Chamber of Commerce	United Way of Central Oklahoma
Greater Cleaves AME	OKC First Nazarene	Urban League of Greater OKC
Guatemaltecos	OKC Fraternal Order of Police	US Grant HS Law Enforcement Cadets
Guiding Right, Inc	OKC Herald	We The People Consulting
Helm Farm	OKC Public Schools	Whiz Kids- Prospect Church
Homeless Alliance	OKCPS Board	Young Democrats National
Hope Community Services	Oklahoma Baptist State Convention Prison Ministry	Youth Advocate Programs, Inc. (YAP)

Additionally, the [voicesofokc@21cpsolutions.com](mailto:voicesofokc@21cpsolutions.com) email portal and the voice mail set up at (405) 203-0759 has received over 70 substantive comments to date in topic areas including:

- Alternative Response to Mental Health Crisis
- Officer bias
- Creation of a Neighborhood Safety/Violence Interruption Program
- Homelessness
- De-escalation
- Youth Outreach
- Officer Wellness
- Procedural Justice
- Appreciation
- General interest in participating in listening sessions

We have responded to many of those that contacted us and met with many community leaders as a result. As discussed above, additional listening sessions with community groups are being scheduled and outreach will continue on an ongoing basis.

### ***OKC Police Department***

21CP sent document requests to the police department to begin discovery on how current policies, systems, and protocols are currently configured and operating. The department designated a single point of contact, which is a great help to this process and has facilitated the response to the initial requests. To date, the department has produced over 1700 documents to 21CP and continues to supplement on a rolling basis. Of note, 1,429 of those documents are trainings, policies, and certifications relating to de-escalation. Additionally, 21CP received all documents relating to officer-involved shootings for the last two years. Overall, we are reviewing all the information and will make follow-up requests as necessary.

Following up on the information requests, 21CP also completed interviews with key department personnel in the areas of Use of Force and De-escalation; Use of Force

Screening Committee; Internal Affairs and review boards; Technology and Data Analysis; Officer Wellness; School Resource Officers, Crisis Intervention, and Youth Outreach. We also discussed the themes presented to the Task Force on potential recommendations around De-escalation and Oversight with Command Staff and the Chief.

### ***Mayor's Task Force on Homelessness***

21CP met with members of OKC Homeless Services, who provided 21CP with the work to date of the Mayor's Task Force on Homelessness and discussed the current state of engagement with their research consultant. The City also provided 21CP with community contacts at organizations supporting the homeless, which is part of our on-going community engagement efforts. The Working Group received information about the ongoing work to address homelessness by the Mayor's Task Force, with the prevailing message that homelessness is not primarily a policing issue.

### ***Officer Wellness Systems***

21CP was provided the wellness assessment by Code4, has reviewed the report, and discussed with the Working Group. Additionally, as discussed above, 21CP interviewed personnel at the OKCPD about their wellness support systems and their response to the Code4 report. OKCPD presented to the Working Group and based on the discussions of the work in that space, 21CP does not anticipate extensive recommendations.

## **E. Community Survey**

After strategizing with the Crime and Justice Institute and reaching out to several possible partners to conduct the community survey, including the University of Oklahoma, the Lynn Institute, and Evolve Partners, 21CP recommended that the City contract with the ETC Institute to conduct the community survey.

This survey is not intended to be comprehensive and certainly will not reach every affected person in OKC. It will be primarily virtual, as door-to-door engagement is prohibitively expensive and not particularly effective. This is a smaller design survey that will test the waters, so to speak, to make sure that we are not missing perspectives in the



direct engagement that is currently underway. 21CP has provided the themes presented to the Task Force as well as some sample questions to assist in the design and implementation of the survey, however ETC will provide the expertise to ensure the most successful survey design possible.