Executive Summary

ELEFA has partnered with County officials, the MCPD, the Reimagining Public Safety (RPS) Task Force, and local residents to identify, evaluate, and recommend structural and systemic improvements the Department can implement to achieve a shared vision of safe and effective law enforcement in Montgomery County, MD.

ELEFA's audit included evaluation of the Department's organizational culture, policies, resources, transparency, procedures and operations. ELEFA issued a Preliminary Report in June 2021 that identified a number of opportunities for improvement. Since then, ELEFA has continued its audit of the MCPD, working in close cooperation with the Department and other constituent organizations.

Though this audit's scope is limited to recommendations based in the MCPD, it should be noted that the implementation of many recommendations will involve cross-agency cooperation and that safe and effective policing requires a healthy ecosystem of agencies working towards shared goals. Further, it should be noted that the MCPD is a high-performing organization. Yet, like all high-performing organizations, there is not only opportunity for improvement but continuous improvement is essential to maintaining pace with constantly changing environmental circumstances and public expectations. Accordingly, our final report on the review of the MCPD focuses on those areas in greatest need of improvement, rather than the strengths of the department.

This summary focuses on the key findings and recommendations of the full report and therefore omits useful information regarding methodology; further discussions; and some recommendations or alternative suggestions. It also omits a preliminary section on the organizational structure of the MCPD. This content can be found in the full report.

An overview of the review is provided on the following pages.

Key recommendations set forth in the final report center around the following areas:

- Systems & Technology
- Early Warning & Intervention Systems (EWIS)
- Education & Training
- District Leadership, Operations & Calls for Service
- Use of Force
- Mental Health Response
- Alternative Response
- Officer Wellness
- Recruitment & Hiring Process

Systems and Technology

Generally, ELEFA found that the Department has the potential and an opportunity to become a data-driven organization leading to better training, performance, accountability, and transparency, but realizing these benefits will require improved data collection and analysis to fully meet the Department's and County's needs. This section is crucial to many of the other areas of recommendation in this report, because adequate data gathering and analysis is crucial to understanding problems and progress. Further, issues with data specific to elements of policing will be discussed in their respective sections of the report.

Key Findings:

- Competent personnel in the Information and Technology Division can perform analytical work.

- There are major gaps in both data collection and analysis. MCPD's systems for tracking and classifying uses of force, CIT responses, and Calls for Service are outdated and woefully inadequate relative to the Departments' needs, generally accepted practices, and the public's demand for transparency.

- Department arrest data is maintained in the Correction and Rehabilitation Information Management System (CRIMS). This database produces the Daily Arrest dataset available on Montgomery County's open data portal. The dataset does not include the race/ethnicity or gender of arrested individuals and only holds data for 30 days.

- During interviews with personnel regarding field interviews, staff members did not know or understand the capabilities of Delta Plus, the system which maintains data from traffic stops, searches, traffic collisions, and field interviews.

- Officers are not required to enter information on all stops based on reasonable suspicion, and may enter information in a field stop but the data is entered into a narrative input on Delta Plus which is not conducive to study.

- The Crisis Intervention Team (CIT) Unit does not use data or analytics to inform strategy or operations. Its work has been self-described as being "reactive" to incoming calls and referrals. The CIT Unit does not have a comprehensive understanding of the number of CIT trained officers, incoming calls and referrals, or any other key data points related to their work. Additionally, the CIT Unit does not use any data to evaluate performance, and the Department as a whole does not track CIT call data, in part because the code for CIT response is often mistakenly foregone.

- Due to severe limitations, historical data does not provide a comprehensive understanding of officer-civilian interaction.

- All areas of policing could stand to see data gathering and analysis improvements which are outlined more thoroughly in the report, including Human Resources, Training, Overtime data and Internal Affairs data.

Key Recommendations:

- **Create internal processes** to ensure that key data on all reasonable suspicion stops are captured in an appropriate single database.

- **Conduct regular analyses of its traffic stop data.** This analysis and the accompanying raw data should be publicly available in efforts to increase transparency and trust with the community.

- **Anonymized Use of force data should be publicly available.**

- **Continue to procure a new RMS and ensure that it is able to comprehensively collect data** in such a manner that is conducive for analytics. The new RMS should have dedicated fields for all relevant data points and the ability to validate geocoded addresses. Ideally, the new RMS would be integrated with other critical data such as use of force reports, crisis intervention reports, and arrest data.

- **CIT data is crucial to not only the MCPD, but all of Montgomery County's crisis response ecosystem.** It should be gathered and shared with other stakeholders, as per ELEFA's commitment to sharing data. The CAD's secondary call code should be used so that calls pertaining to crisis intervention can be tracked. This will be expanded on in the Mental Health Response section of the report as well.

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Early Warning and Intervention Systems

Maryland state law now requires each department in the state to create an "early intervention policy" for tracking complaints to identify an officer who may exhibit a pattern of actions or behavior in order to provide intervention. An Early Warning or Early Intervention System is a computerized database of police officer performance indicators, including uses of force, citizen complaints, arrests, traffic stops, officer discipline records, use of sick leave, and others.

Key Findings:

- The MCPD EWIS is based on a system wherein an officer's supervisor is notified after a third citizen complaint in 12 months. The supervisor can then determine which tool would be most effective, and their response to the EWS including the method and results is recorded in a counseling memo. This memo, however, only remains in the officer's records for a further 12 months.

Key Recommendations:

Produce a more robust EWIS that considers more factors (for example weapons discharge and missed court appearances) and analyzes data in more ways (for example, a peer officer comparison).

Education and Training

The Montgomery County Police Department (MCPD) has excellent training facilities and committed professional training staff and meets and/or exceeds all of their training mandates for the Police Academy, in-service, and various training programs.

It is important to note that since the preliminary report has been released, several crucial changes have been made to education and training. Work is underway to update any and all training materials that ELEFA has selected, as well as identify and remove harmful training practices like references the "Warrior" mentality. In addition, new training programs are being implemented both for new recruits and annually, such as adding a training block on procedural justice for Sergeant and Lieutenant schools. Therefore, all of the key recommendations in this section are already in the process of being addressed, which is reflected in the report with detailed information on the steps already being taken.

Key Findings:

- Many exceptional recruit training programs. The Academy does require its instructors to debrief recruits during and after learning activities. However, they do not teach an actual problem-solving model that recruits must use to critically think and solve the numerous learning activities given to them in the Academy.

- Officers welcomed changes to Academy training. MCPD does not use an 8-step traffic stop approach and, in many cases, does not allow for the violator to have "voice" – as in procedural justice. In past discussions with the Education and Training Division (ETD), they purposely do not do this, as they perceived it could lead to conflict, but after brief discussion were willing to adopt changes to training.

Key Recommendations:

- **Ensure that Academy training is at a university level**; consider hiring a civilian PhD at a high level and introduce learning constructs so that retention of information is stronger.

- The Re-Imagining Public Safety Committee (Task Force) identified changing the MCPD to a "Guardian" culture as their number one recommendation. This can be achieved through **increased training that focuses on the values of the department; promoting active bystandership; focusing on procedural justice training** (for example, CAL-POST's 8-step model LEED format for traffic stops).

- **Consider more programs for annual training requirement** so that retention improves and lessons learned are reinforced.

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District Leadership, Operations, and Calls for Service

We reviewed over 500 BWC recordings to consider Department and District culture, operations, leadership, and management, as well as officers' interactions within the Montgomery County community. A breakdown of results as well as in-depth discussion by district with district-specific recommendations can be found in the full report.

Key Findings:

- Most officers were courteous and friendly while handling calls for service and traffic stops. The community members reporting incidents were ethnically and racially diverse. Although a representative sample was utilized for the review, few arrests were observed during the BWC audits. In general, there were no indications of racial bias in the BWC incidents observed.

- However, of the traffic stops reviewed in the random BWC sample, most interactions included people of color.

- There was excellent handling of domestic abuse calls for service; officers used appropriate de-escalation where necessary and were empathetic, well-trained and informed.

- There were limited incidents where individuals in crisis were given inadequate explanation prior to transport, which can lead to fear and the mistaken conclusion that the individual is under arrest.

- There was a lack of supervisors observed at the scenes for calls for service. We observed very few supervisors at the scene of most calls for service.

- In most cases, officers did not properly introduce themselves to citizens at the beginning of events. There were some examples of officers being brusque and/or stern in their communications skills with the reporting persons.

- The MCPD has an extensive list of disposition codes that officers can use to reflect the outcome of calls for service. Unfortunately, the audit revealed that officers only use a few of these codes such as code 29911 "Other Miscellaneous" and code 24131 "Disorderly Conduct" to reflect the outcome of most of these calls for service.

- Several Body Worn Camera (BWC) protocol issues, for example BWCs being activated after the officer's arrival, leading to missing context and data.

Key Recommendations:

- **Supervisors should conduct regular, random audit reviews of BWC's** when there is any type of arrest or physical altercation on domestic calls for service. Supervisory reviews will aid in verifying officers are clearing calls properly

- **Change the BWC activation policy** to clearly direct a) officers shall press BWC activation button prior to broadcasting any information regarding traffic stops; b) require Sergeants to randomly review a monthly sample of BWC incidents of the officers assigned to their shift; and 3) ensure activation of all AXON devices (have AXON link devices). BWCs should be turned back on in sufficient time to capture all discussions with the parties (after officers have turned them off for private consultations). Further, Montgomery County Bill 18-21 requires random review of body worn camera footage.

- Officers can **improve their professional response with a proper greeting and personal introduction,** rather than "What's going on?", "Did you call?" etc.

- **Consider requiring Sergeants to conduct bias investigations at the scene of traffic complaints.** Also, data analysis should be undertaken to prove or disprove if transitory traffic patterns impact racial disparities and to what extent.

- **Discuss issuing stripped chevrons** for Sergeants to place on the arm sleeves of their shirts to improve the identification of field supervisors.

- **District Commanders should ensure reviews of field supervisors** to ensure that they are responding to a variety of calls and investigations in a more uniform manner.

Use of Force

ELEFA evaluated MCPD's use of force policy, reporting, sixty use of force incidents, and a sample of use of force investigations.
ELEFA found areas for improvement in the Department's policies, practices and some investigations. For example, the former policy lacked specificity and failed to address important aspects in uses of force; however, many of these concerns are addressed in MCPD's recently adopted, revised policy. The Response to Resistance and Use of Force Policy, FC 131, became effective May 2021.

The Command Staff was very accommodating and helpful in assuring that ELEFA had all the information and documents required to conduct our review. MCPD provided ELEFA with a list of use of force incidents. From this list, a sample of cases was selected for the review. The random selection included force such as: OC (Oleoresin Capsicum) Spray, commonly known as 'pepper spray', K-9 bites, strikes, takedowns, weapons (handguns/rifles), ASP (Armament Systems and Procedures), commonly known as 'batons' and ECDs (Electronic Control Devices-Tasers, and also referenced as ECWs).

A total of 60 incidents were selected plus 8 completed formal internal affairs investigations. The review particularly targets MCPD internal processes for assigning, investigating and reviewing force incidents occurring by MCPD officers. Additionally, ELEFA considered bias in MCPD investigatory and complaint intake processes. ELEFA also selected a sample of six Internal Affairs (IA) investigations over a three year period to study.

Key Findings:

- ELEFA observed the following use of force and policy violations in our review of BWCs: pointing of firearms, takedowns, subject complaints of injury/pain, OC spray, strikes, tactical vehicle stop, officer demeanor (excessive cursing), failure to give warning before ECD deployment, damage to property, improper use of K9, subject complaints of possible excessive force.
- MCPD does not define levels of force or provide guidance to the investigating force officials on circumstances when to elevate less serious uses of force to Internal Affairs or a Force Team to initiate a formal investigation, though MCPD reports all use of force reports are reviewed at the Bureau level after review by the commands.
- As previously stated in the Systems and Technology section, inadequate data hampers any understanding of the real problems around use of force incidents.
- MCPD does not issue BWCs to SAT (Special Assignment Teams). These officers work on the front line and often engage with the public. When force is used, no video is available to review when warranted.
- Off-duty BWCs may be a bargaining item in negotiations with the FOP.
- Generally, the Internal Affairs administrative investigations were complete and contained all the information within the investigative case file to support a finding. (i.e., BWC video, Mobil in-car camera videos, interviews of witnesses, interviews of involved and witness officers, physical evidence, scientific evidence). Response letters to complainants are timely.

Key Recommendations:

- **Define Departmental standards on use of force levels** and terms, i.e. serious use of force
- **Determine a single repository** for use of force and IA incidents.
- **All use of force incidents should be investigated, and not simply reviewed.** IAD currently may not have the staff to investigate all use of force incidents. Expand the role of IA to include investigating criminal misconduct of officers instead of assigning this to investigators in ISB (Investigative Services Bureau). IAD needs additional staffing to conduct parallel criminal and administrative case investigations.
- **Develop a Force Investigation Team (FIT) within Internal Affairs** to conduct serious uses of force investigations and review. This may be considered along with OAG responsibilities related to handling criminal cases.
- Develop a system to conduct criminal and internal investigations as **parallel investigations.**
- **Revise MCPD use of deadly force investigation policies and protocols** to require a prompt, separate, parallel administrative investigation of each officer-involved shooting, and require the preparation of a report documenting investigative findings. This would be an improvement on the current IAD administrative report.

  ~ continued

- **Allow the Districts to review only those less serious uses of force.** Although there is ACC, there may still be a role for the Internal Investigative Review Panel should broaden their role when convening on force matters, and determine if force incidents raise policy, training, equipment or tactical concerns, and record outcomes.

- **Define a Departmental standard on what is expected to be included** when conducting District level force investigations.

- **Administrative intake should be required to be recorded by audio or video.**

- **Provide training to District supervisors in force investigations** and hold them accountable for evaluating their officers' videos with a critical eye.

- **Initiate an internal auditing protocol for BWC and other force related videos.**

Mental Health Response

Safe and effective responses to mental and behavioral health crisis calls require a coordinated, inter-agency response. Focusing exclusively on MCPD's policies and practices will not achieve necessary improvements. This report focuses on the MCPD's response but consequently will mention elements of the broader Montgomery County behavioral health ecosystem.

ELEFA reviewed existing policy; BWC on forty randomly selected mental health calls for service; the mental health related training from 4 previous (non-consecutive) years; and interviewed a broad spectrum of stakeholders (including all MCPD District Commanders, a Mental Health Court Judge, MCPD officers assigned to the CIT team, members of the Mental Health Advisory Committee and many more detailed in the full report).

Taken together, this has informed a better understanding of the current roles, functions, and gaps as part of a holistic ecosystem supporting 21st century response to individuals in crisis.

The full report discusses different possible models; further questions of intersectionality; observations on BWC footage as well as an in-depth overview of service delivery and why improvements to CIT response are so wholly necessary in any community. Due to the crucial nature of the topic, this section has many additional findings & recommendations that are detailed in the full report.

Key Findings:

- There are presently four CIT trainings offered per year, with the Chief of Police opening the training. This is commendable as it signifies support from the Department's leadership.

- MCPD CIT completion data exists (73% SGT; 70%LT; 50% CPT; 64% FTO's; and 66% patrol CIT trained) but there is no information on how recently training was completed, which is particularly relevant considering that there have been so many changes to MCPD CIT programs

- After a fatal shooting in 2000, CIT training began and used the Memphis voluntary/specialized only model, but has since been moving towards a more generalized model wherein all recruits must attend the 40 hour training. Though there are benefits, this can mean that officers who aren't CIT specialized are responding when situations call for someone with better and more recent training.

- Of forty calls analyzed, only three calls involved the use of the MCOT. In one case, MCOT was already on scene. Strengthened partnerships and improved protocols may be required for this model to be more successful.

- It is somewhat unknown how many officers are CIT certified. The training tracking system has deficiencies. In addition, too few officers are Taser certified. No Requests for CIT officers are heard over the air, and rarely for CRSS.

- The current MCPD specialized program under the Crisis Response and Support (CRSS) umbrella is a CIT team made up of two full-time officers and one clinician (LCSW). The team had been operating without a Sergeant, however one was recently assigned.

Key Recommendations:

- **Prioritize CIT training for all commanders,** make it a requirement for pre-service promotion, and mandate mental health refresher training annually, or at minimum every three years.

- **Create a "bumped up" specialized cadre of officers with additional training** who are prioritized for response to higher level calls for service. This specialized model would provide a "real time" response, for example, a co-responder clinician and CIT officer on patrol and prioritized to calls for service that involve a mental health component; a follow up response for high frequency utilizers of mental health calls for service, as well as patrol and community request for follow up.

- **An internal specialized response is needed to assist with calls where MC44 would be otherwise utilized.** Additionally, co-locating MC44 teams within the police substations would be another good option to consider, not only to improve clinician/police relationships, but also to improve knowledge of the program, facilitate improved response time, and to have the clinician teams own the EEP and hospital liaison process.

- **Evaluate data to develop efforts to reduce force in crisis or mental health related calls for service.**

- **Data assessment may be required to develop targeted efforts to reduce call times for crisis related calls for service.** Specialized response services should be considered.

- **Determine any barriers to accessing the crisis center.** Facilitation of access to medications, community-based resources etc. are greater at a community crisis center than a hospital, while reducing trauma that can be associated with hospital environments.

- **Evaluate updating the training tracking system at MCPD.** Additionally, automate the date the (40) CIT was provided, and develop a cadence for required refresher training at minimum every three years, preferably annually. Develop use of an alpha character, or other character to designate mental health calls even when clearing it with a primary call code. Additionally, differentiate and train on 2942 and 2950, using 2950 for all emergency petition transports.

- **Ensure crisis policies are evaluated annually, with stakeholder and public input; ensure policies integrate well with other Department policies as well as with Fire/EMS and other community resources**

- **Establish a call code system** that accounts for primary and secondary call codes that best capture overall calls for service (CFS) that involve a mental health component. Call codes should also be developed for alternative response calls. Require a CIT report be reliably completed for calls that are closed out as calls involving a mental health component.

- Because MCPD reports they often drop people off at the jail in order to get individuals screened by jail mental health staff (CATS), **ensure utilization data is tracked to support ecosystem program changes.**

Safe and effective responses to mental and behavioral health crisis calls require a coordinated, inter-agency response.

Alternative Response

Montgomery County has strong public motivation and resources to develop a more robust, integrated crisis response system (for instance, a multidisciplinary community response model(s), behavioral health unit, mobile crisis outreach, community facing social worker embedded in telecommunications to divert non-emergency calls, additional EMS based mobile integrated health teams etc.). As mentioned in the Mental Health Response segment, this broader ecosystem is essential to safe and effective crisis response. Though this report focuses on MCPD, some of the recommendations in this segment are directed towards other actors/stakeholders.

Key Findings:

- The County has adopted the Crisis Now Model, which includes 24/7 Crisis Call hubs, mobile crisis outreach teams and 24/7 receiving centers. This is a strong model, with recommendations in this report fully supporting this.

- If it is often unclear when MC44 (MCOT) or the MCPD should respond, this is an ecosystem problem and must be prioritized.

- The Montgomery County Sheriff's Office (MCSO) Domestic Violence Unit are charged with serving emergency petitions (typically those issued by the court), in addition to restraining orders and child custody orders. This unit has no pre-assessment process to identify fit for this role, and emergency petitions can sometimes get "bumped down" in urgency due to priority of restraining orders. It is estimated this unit serves and transports 400-500 emergency petitions annually, with MCPD estimated to serve even more. Due to MCPD data limitations, this is difficult to track.

Key Recommendations:

- **Establish clear criteria for emergency communications to identify and dispatch these calls,** and ensure there are robust, ongoing cross-discipline training (including call code designation, triage questions, and CIT training). While the goal of many of these programs is to divert calls from 911 altogether (e.g.: 988), the reality is many calls will still come to 911. A coordinated effort between a CIT coordinator, emergency communications and other multi-disciplinary community response programs should be prioritized. There should be thorough awareness of the programs, and a streamlined approach for response.

- **Expand the CRSS CIT Team.** This current team of two sworn officers and a civilian social worker is drastically understaffed. This should be expanded to a behavioral health unit, and likely tripled or quadrupled in size to do justice to the needs of the community. A multidisciplinary team could be piloted under this unit.

- **Establish much needed paramedic, clinician, soft uniform CIT officer and (where appropriate, PEER) dedicated multidisciplinary-response team models,** with unmarked vehicles, and soft uniforms. Whenever possible, prioritize alternative transport options that do not include handcuffs.

- **Consider embedding a clinician(s) inside telecommunications to divert from law enforcement response at all,** while also utilizing a warm hand off as necessary to a resource line, multidisciplinary team that includes a CIT officer, or other non-police based programs (CAHOOTS, MCOT etc.). As Maryland gears up for the implementation of 988, this is a good place to dedicate alternative response resources.

- **Consider a specialized behavioral health unit** taking lead in police involved emergency petitions.

- **Include a laminated card kept in all patrol vehicles** (or pocket books if MCPD carries those) that includes important information for officers to easily reference to include things like: Correct Mental Health Clear Codes; Crisis Center locations, hours of operation, phone number; MCOT hours of operation, contact person and phone number; Hospital Phone Numbers, locations and type of individuals accepted (youth, adult etc.); CATS contact info and hours of operation; CIT Unit phone and email; Specific paperwork or procedure information etc. along with a "resource list" for patrol to give out to families on these calls.

- **Develop justice involved case management teams at the community mental health center** who have the role of serving high frequency utilizers of law enforcement calls and jail bookings. These teams can also assist with a warm handoff out of the hospital for emergency petitions.

Officer Wellness

Officer Wellness was not a formal part of this review, however, one cannot discuss community crisis services and holistic wellness without including a focus on officers who are often responding to these crises. The health of our first responders is a key part of community health and the positive outcomes on calls for service involving a mental health component. All too often, community resources are being funded, but not law enforcement resources designated for wellness. This should be considered an equal priority.

Key Findings:

- MCPD has had 3 officer suicides in the past 10 years.

- For many years, efforts have been under way to formulate a wellness program specific to MCPD officers. However, a comprehensive wellness program is not in place. The FOP would like to see a nationally recognized wellness program as an important goal.

Key Recommendations:

- **Complete a comprehensive officer wellness needs assessment** (which includes Patrol officers as part of the task force), and develop a strategic implementation plan.

Recruitment and Hiring Practices

A police organization's success begins with its recruitment strategies. A Department's recruitment efforts impact every other function of the agency. Model departments ensure that recruitment efforts are designed and operated to identify and hire candidates that reflect the communities they serve, especially including historically underrepresented populations. The Department requires an associate degree, or equivalent, at the time of application, or three years of active-duty military service with an honorable discharge, or three years of full-time law enforcement experience recognized by MCPD.

The full report analyzes recruitment and retention data, and goes into further detail about both challenges and opportunities to find the right recruits.

Key Findings:

- Challenges to hiring include police-specific; such as well-publicized police use of force incidents in recent years negatively impacting public image; as well as more general recruitment challenges such as generational workforce differences and the pandemic.

- Montgomery County salaries used to be some of the highest in the area but have now fallen in comparison to other local agencies in the region. It was reported that being ranked 13th in the area in starting salaries negatively impacts attracting quality candidates. As of FY23, the Fraternal Order of Police Lodge 35 has negotiated a wage increase that would increase officer's pay to one of the highest in Maryland.

- The Department surpassed prior recruiting efforts with successful diversity recruitment in Session 74, having a 58% minority representation (7 White, 5 African American, 2 Hispanic, 3 Asian). Unfortunately, they were able to fill only 17 of the 34 authorized positions for this Academy Session.

- In 2019, the recruitment team added 41 police officers as decentralized recruiters. As of 2022, the Department has 93 decentralized recruiters. The decentralized recruiters are well trained in current recruitment information, they assist with career fairs and community events, and serve as mentors to police cadets. One of their main goals is to find recruits that represent the community of Montgomery County.

- There are new partnerships and pathways being built including an expansion of the Cadet Program with Montgomery College, offering scholarships.
- There is a downward trend in employee retention, particularly notable among younger officers and FTOs.
- A variety of screening measures are used, including a polygraph test and psychological evaluations.

Key Recommendations:

- **Add a cloud-based technology** as a streamlining measure and to increase effectiveness and efficiency for background investigators. This is currently in progress since the preliminary report.
- **Reduce the amount of time it takes to process candidates** using technology and combining processes when practical and the MCPD is implementing these practices. This is currently in progress.
- **Review and analyze adverse impact analysis reports** regularly for negative trends and adjust practices as warranted to reduce adverse impact at any stage, if indicated. And make adjustments to the written test. The MCPD has completed this review, made adjustments to the written test, and eliminated the PFAT testing.
- **Consider increasing the starting salary for entry-level MCPD police officers** to become more competitive in the Washington Metropolitan area. There is a significant increase proposed in the FY 23 budget. MCPD should consider conducting a comparison study on all Maryland law enforcement agencies' salaries and present the data to the County Council for consideration.
- **Assess MCPD employee turnover continually,** and review reasons officers leave the Department. The MCPD is working with County HR to continually assess attrition.
- **Provide additional training and leadership guidance** so that workplace "inclusion" becomes part of the everyday MCPD work-life culture.
- **Provide more training and monetary incentives to FTOs.** Training should focus on the importance of providing the best possible training to probationary officers by following all Department policies and procedures. Consider paying the FTOs the full amount of the hourly rate even when they are not training probationary officers.
- **The Department's leadership must continually promote "inclusion"** as an integral part of its culture and value. Improving recruitment should continue to be a broad, department-wide, effort involving steps to improve community relations and community engagement, increase transparency, and continue persistent efforts targeted at reaching under-represented populations.

A Department's recruitment efforts impact every other function of the agency.