Safety Beyond Policing:
Promoting Care Over Criminalization
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Executive Summary

This report has two main goals: to review innovative alternatives to traditional policing that have been implemented in cities nationwide, and to propose feasible reforms that are cost effective and that further public safety. The report’s premise is that police intervention need not and should not be the default response to every social ill, from drug addiction to unlicensed street vendors to misbehavior of youth.

In recent decades, American policing has faced widespread criticism and often outrage for a broad range of failures – its ineffectiveness in addressing problems like drug addiction, mental illness, and sexual assault; patterns of enforcement that disproportionately burden people of color; and an excessive proclivity to use deadly force in officer-citizen encounters. Paradoxically, policing faces criticism for the insufficiency of its response to social problems, and for its unnecessary and harmful intrusion into areas of social life where it does not fit. Nevertheless, proposals to fundamentally reconfigure policing were slow to gain traction with the American public.

That changed in the summer of 2020, when a series of high-profile cases of egregious police violence against Black Americans led many thousands of people across the country to join protests calling for police agencies to be defunded or for much of their traditional role to be abolished.

For this report, we sought a partnership with civic leaders who could broadly represent public views on American policing, who could bring an expert perspective on the ground-level realities about the state of policing functions, and to advise us on the feasibility and likely effectiveness of various proposed mechanisms for reducing or redesigning the role of police in society.

We were fortunate to enter a partnership with the African American Mayors Association (AAMA). With the assistance of AAMA staff leadership and members, we undertook a review of public safety solutions available as alternatives to traditional police enforcement. We reviewed expert literature about four
areas of common police involvement – mental health crisis response, homelessness, traffic enforcement, and school discipline – to determine best practices. We spoke with officials in cities across the country who have implemented reforms designed to replace police actors with civilian enforcement. This report contains our findings and recommends concrete steps cities can take to save money and improve public welfare by moving particular jobs to providers other than police officers.

**Methodology**

We started with a review of academic literature to identify problems that have been identified with traditional police management of particular social problems and solutions that have been proposed. We confirmed our initial findings by consulting primary source materials and by reviewing data from the Stanford Open Policing Project, the Bureau of Justice Statistics, and local organizations.

After initial research, we recognized that our inquiry, and the mayors’ overall concerns, sorted into a few discrete subtopics:

- Policing and mental health crises
- Policing and homelessness
- Policing and traffic safety
- Policing and school discipline

The core of our research then focused on interviews with mayors, city officials, and stakeholders implementing programs designed to ameliorate harms. In addition to interviews with AAMA mayors and key staff, we conducted 22 interviews with academics, non-profit leaders, politicians, agency staff, civil service workers, and a local judge. Because AAMA includes a wide range of cities, from Holly Hill, SC with just over 1,000 residents to Houston, TX with 2.3 million, we similarly defined “cities” as broadly as possible. The examples analyzed in our report are drawn from cities with populations as small as 13,000 and as large as four million.

This report represents the findings and recommendations of its authors – Stanford Law School faculty and student researchers – not the AAMA or its member mayors. Indeed, these mayors reflect a diversity of cities and circumstances and thus hardly speak with a single voice. While many of our ideas derive from our meetings with member mayors and some of their cities may consider adopting some our recommendations, a major role of our AAMA partners was to serve as a sounding board, providing critical perspective for our own thinking on these issues. Drawing on their wisdom and
experience, they responded to our initial findings and recommendations with crucial feedback. In each of the areas we address in this report—mental health response, homelessness, traffic safety, and school safety—the mayors urged us to remain mindful of the importance of ensuring citizens’ trust of police, the costs associated with policing, budget constraints in implementing related social services, and logistical challenges related to introducing new public safety programs. We have sought to take account of these concerns and reflect them in our recommendations.

**Context**

This is a critical moment to address concerns about policing in the areas we have enumerated. In addition to the numerous failures ascribed to American policing in recent decades and the renewed roiling controversies over police bias and deadly force in early 2020, policing, like all government functions, suddenly encountered the crisis of the coronavirus pandemic. Millions of Americans are facing dramatic food and housing insecurity and will continue to do so in the coming months, and proposed federal relief plans may prove too little, too late to save many renters from looming evictions. Roughly 40 percent of Americans report struggling with mental health or substance abuse during the pandemic. Children are not immune to these consequences: teachers will face a perfect storm of behavioral issues as students return to schools after months of isolation, often with continuing stressors at home because of to the health and economic effects of the pandemic. City governments, facing dramatic budget restrictions due to falling tax revenue, are hard-pressed to justify every dollar spent on public services. All these forces have exacerbated social problems that law enforcement is often ill-equipped to or wrongly assigned to address.

The timeliness of this project is further underscored by some blunt political facts about the immediate opportunities for significant change. For the next two years, control of the presidency and both houses of Congress (the latter by very thin margins) is lodged in a party many of whose leaders have called for dramatic police reform and have proposed federal spending programs to local jurisdictions to reengineer their approaches to public safety policing. American confidence in policing has reached historic lows, and large numbers of Americans endorse investment in public health and safety measures in lieu of or as a complement to existing police services. A poll conducted by USA Today in the summer of 2020 found that most Americans agree on reducing the scope of policing to serious or violent crimes, and specifically turning to civilian agency and technology solutions to address mental health crises, school safety issues, and traffic enforcement in particular.¹
Key Findings

Mental Health Crises

Mental health emergencies constitute up to 10 percent of all 911 calls and accounted for a quarter of all police-involved shooting deaths in the last six years. Nearly two million people with serious mental illness are booked into jail each year.

Controversies over policing in this context center around the following four concerns: (1) Police are often ill-equipped to provide the help needed by an individual in a mental health crisis. (2) First response to mental health crises by police risks escalation into violence. (3) Early involvement by police often ensnares the individual in criminal charges that could have been avoided. (4) Using police as the default response to mental health crises strains scarce police resources.

The solution is to replace police, where possible, with first response by civilian professionals. Roughly three decades of implementation data support the effectiveness of a civilian first responder team consisting of a medic and a crisis worker in lieu of police dispatch for mental health crises. In cities that have implemented these programs, the teams require police support in less than one percent of dispatched calls. The experience in cities that have implemented alternative first responder programs for mental health emergencies also suggests that such programs can save millions of dollars otherwise spent on police response, ambulance services, and emergency treatment for individuals in mental health crises.

Homelessness

As homeless encampments have expanded and proliferated over the course of the last decade, jurisdictions have typically responded with ordinances criminalizing homelessness in various forms and encampment evictions. Encampment evictions are expensive and ineffective, often costing cities hundreds of thousands of dollars a year, without addressing the needs of local unhoused populations.

Recent debates over policing in regard to homelessness have focused on the arguably gratuitous use of criminal laws as an inapt response to the deep social and economic problems facing unhoused people instead of constructive approaches to the fundamental conditions and causes of homelessness. These criminal charges derive from unnecessary and distortive use of such purportedly general laws as loitering and vagrancy statutes, as well as from the use of police in forcibly evicting people from homeless encampments.
Courts are also increasingly recognizing legal rights of unhoused populations to camp or sleep outdoors, retain their belongings, and beg or solicit funds from passerby. A recent Ninth Circuit ruling prohibits cities from imposing criminal sanctions on unhoused citizens sleeping outdoors without an alternative form of shelter. As an alternative to criminalization, the preferable approach is to provide safe housing and affirmative outreach to mitigate the harms faced by the unhoused community.

Beyond simple enforcement of ordinances that prohibit camping or sleeping in public, these mechanisms can include enforcing strict notice periods, offering storage space for encampment residents before displacement, and establishing zones where homeless encampments are permitted. Combining permissive ordinances with social services outreach tailored to the needs of homeless people can vastly improve outcomes for citizens on the streets while limiting expenses associated with ineffective criminalization measures.

**Traffic Enforcement**

Traffic stops reflect the most common police-initiated interaction between officers and civilians, and often serve as a litmus test for perceptions of police legitimacy. The U.S. Supreme Court has held that any traffic code violation provides sufficient justification for police to stop a vehicle. Given the breadth of traffic codes, this affords police officers virtually unlimited discretion to stop any driver.

The current debates over police and traffic enforcement raise several concerns: (1) Broad police discretion allows for arbitrary and racially skewed interventions and excessive criminal charges. (2) Traffic stops can escalate into violence. (3) Reliance on police is often far less effective in meeting the professed goal of public safety than are non-police alternatives.

Police often use this authority to investigate crimes unrelated to traffic enforcement, stopping drivers on the pretext of a minor violation in order to search for evidence of other crimes. Nationwide, police stop Black drivers roughly 1.5 times as often as they stop white drivers, and search and arrest Black drivers at twice the rate of white drivers. Evidence suggests that these kinds of pretext stops do little to deter crime or improve traffic safety.

Despite a broad grant of authority to police, American streets are not particularly safe: road fatalities in the U.S. are roughly 50 percent higher than in other high-income countries, and low-income communities that experience the highest rates of policing also often have the most dangerous streets.² Research suggests methods to generate “self-
policing” streets with relatively low-cost interventions like improving lighting and street infrastructure. Technological solutions can also promote equity by removing discretion and police interaction from traffic solution. Finally, research suggests that civilian enforcement of the traffic code can be equally as effective as police enforcement while mitigating some of the harmful consequences of police interaction.

**School Safety**

School police officers were uncommon until 1999, at the time of the Columbine school shooting. Now, 1.7 million students attend schools with police but no counselors, while 10 million students attend schools with police but no social workers. Black students are three times more likely than their white peers to attend schools with more security staff than mental health personnel. Data also shows that schools are generally very safe environments for kids, and juvenile crime rates have dropped dramatically in the last two decades, mirroring similar drops in general crime rates.

The key issues are as follows: (1) Police presence on school campuses is not conducive to optimal learning. (2) Using police officers for school safety can cause young people to distrust police. (3) Police presence in schools exacerbates the well-documented racial disparities in school disciplinary penalties. (4) Police-imposed penalties often set young students on a path toward future ensnarement in the criminal justice system.

Empirical research regarding the effect of police presence on student safety is inconclusive, but scholars have found a strong causal connection between school resource officer (SRO) presence and the referral of students to the criminal justice system. Controlling for other variables, students in schools with SRO programs are far more likely to face referrals to law enforcement and arrests for minor offenses. Despite these harmful consequences, SROs are often popular; many mayors felt strongly that their school officers promote a positive relationship between students and police, and a majority of parents believe that SRO presence makes school safer for their children.

School districts that have replaced police officers with social workers, counselors, or behavioral health professionals have seen reductions in public altercations, expulsions, and suspensions. Where school districts choose to retain SROs, all parties can benefit from implementing clear guidelines for when and what role the SRO will play in school discipline procedures. Similarly, cities should take care to ensure that any police officer employed in a school-centric capacity is subject to rigorous standards as to hiring and training requirements.
Recommendations

Implement a Mental Health First Responder Program.

1. Start with a relatively small pilot program to retain flexibility and ease initial funding.
2. Loop in existing civic organizations and municipal departments in the development stages to maximize institutional knowledge and limit interference with existing services.
3. Route calls from existing 911 communications systems.
4. Staff Mental Health First Responder teams with one emergency medical provider and one crisis worker with experience in mental health crisis response.
5. Pursue federal funding through Medicaid, the U.S. Department of Justice, and the U.S. Department of Housing and Urban Development to support initial development.

Meet homeless populations “where they are” with services.

1. Review existing ordinances to determine offenses that criminalize homelessness, and work to eliminate or reduce enforcement of those ordinances.
2. Identify key partners, including city agencies and civic organizations, that engage routinely with unhoused citizens to identify current gaps in services.
3. Solicit input directly from unhoused individuals and hold space for local engagement to determine what services will be most effective in your city.
4. Structure outreach programs, both literally and figuratively, around the existing homeless population by incorporating local residents’ feedback about needed services and ensuring those services are offered in close geographic proximity to encampments.
5. Pursue federal funding through Medicaid and the U.S. Department of Housing and Urban Development Emergency Solutions Grant.

Limit the need for police to perform traffic enforcement.

1. Institute a formal policy discouraging local police from engaging in pretext stops, and consider a warning policy for minor traffic infractions.
2. Invest in low cost, high impact engineering solutions to improve street safety by shoring up pedestrian and bike space, repainting crosswalks, lowering speed limits, and re-timing signals at dangerous intersections.
3. Review state laws regarding use of automated traffic cameras and unarmed civil enforcement agents.
4. Consider establishing a civilian Department of Transportation or shifting traffic enforcement duties to civilian enforcement agents within analogous city departments as state law permits.
5. Seek federal funding from the U.S. Department of Justice Community Oriented Policing Services (COPS) Office to fund transfers of traffic enforcement duties out of the police department.

**Re-evaluate the role of SROs in schools.**

1. Create a School Safety Taskforce of relevant stakeholders to review data on the current role of SROs within schools.
2. Gather data on funding structures, disciplinary procedures, student arrests, and current safety plans in and around the school.
3. Solicit input from students, parents, and teachers on the existing data and goals for school safety programs moving forward.
4. Develop and distribute a clear decision tree and memorandum of understanding as when police should be called to intervene in school discipline matters, and what role SROs will play in school safety going forward.
5. Pursue grant funding for alternative safety solutions and training and hiring reforms as needed.

**Conclusion**

We are at a pivotal moment for police reform in America, as national attention is focused on the disparate harms suffered by Black Americans at the hands of police, and the dramatic disruption of the coronavirus pandemic has shaken up normal routines. Given the possibility of federal funding for police reform, the time is ripe for developing reform proposals and engaging in community discussions about the future of public safety. The proposals detailed in this report have proven more effective and less expensive over time than traditional policing approaches in these issue areas. Critically, they also reduce unnecessary interactions between police and civilians, which will help protect vulnerable populations from getting caught up in the criminal justice system. Cities should seize this moment and work to develop a safer and fairer public safety system for the future.
Introduction

American policing is in the midst of an existential crisis. The explosive growth of recording technologies and internet access has led to a substantial body of evidence viscerally demonstrating the disparate treatment of people of color at the hands of police in the United States. Organizers expertly used social media to amplify these stories, especially since the founding of #BlackLivesMatter in 2013, and won significant victories for accountability for police in the following years, including a renewed focus on routine police tactics, widespread adoption of additional accountability measures like body cameras, and a dramatic shift in public opinion about inequality and racial justice. But 2020 in particular marked a major turning point for our country’s understanding of policing inequity. Nationwide, confidence in police hit a record low in August 2020, after a series of highly publicized, egregious use of force incidents led to civilian fatalities in cities around the country. Tens of thousands of citizens took to the streets, despite a global pandemic, to protest excessive use of police force, often to be met with excessive police force to disperse the protests. Stories and images of peaceful protestors, journalists, and legal observers being met with tear gas, rubber bullets, and batons popularized a new rallying cry: defund the police.

Against this backdrop, we set out to assess the underlying assumptions and implications of de-policing and the various mechanisms that have been tried or proposed to move towards that goal. We were interested in determining whether there were particular areas of police activity that could productively be reassigned to agencies other than the police, providing opportunities for forging at least a limited consensus between advocates of “defunding” the police and the majority of Americans who remain skeptical of those calls but want the police to act more equitably and effectively. As a crucial step in our work we were fortunate to arrange a partnership with the African American Mayors Association (AAMA). AAMA mayors represent a very diverse group of cities, ranging in population sizes from 1335, in Holly Hill, South Carolina, to 2.3 million in Houston, TX. As we organized our research we found it best to classify the practical issues of policing into four key areas of police involvement – mental health crisis response, homelessness, traffic enforcement, and school discipline – to determine best practices. We spoke with officials in cities across the country who have implemented reforms designed to replace police actors with civilian enforcement. This report contains an overview of our findings and recommends concrete steps cities can take to save money and improve public welfare by what might be called “selective de-policing.”

We stress that this report represents the findings and recommendations of its authors – Stanford Law School faculty and student researchers – not the AAMA or its member mayors. Indeed, these mayors come from widely varied cities and make no claim to speak
in a unitary way. In settling our findings and drafting our recommendations, we benefited from insights gleaned from our meetings with member mayors, and, we hope that some of their cities may consider adopting some our recommendations. But probably the major role of this partnership was to allow us to draw on the invaluable perspective provided by AAMA members. Drawing on their wisdom and ground-level government experience, the mayors responded to our ideas, questions, and suggestions with crucial realty-tested guidance. In each of the areas we address in this report – mental health response, homelessness, traffic safety, and school safety, the mayors urged us to remain mindful of these concerns in reducing or redesigning the role of police: (1) the importance of ensuring citizens’ trust of police; (2) the costs associated with policing and budget constraints in implementing related social services; and (3) logistical challenges related to introducing new public safety programs.

In many interviews, mayors were sympathetic towards and sometimes strongly defended their local police, noting that even when faced with funding challenges, intractable social problems, and an increasingly distrustful citizenry, officers in their jurisdiction did their best to enforce the law without exacerbating bias and inequality. In effect, police in America seem to be like Congress: everyone hates the institution but likes their representatives. Because many of us began this endeavor with certain hypotheses endorsed by strong advocates of police defunding, our relationship with AMMA proved to be a constructively dialectical one, helping to ensure that our work was appropriately self-critical.

Still, our research revealed discouraging statistics nationwide. Study after study shows that Black Americans in particular are, in relation to whites, stopped or arrested disproportionately in relation to population and demonstrable crime rate, more likely to be searched, and more likely to be subjected to police force including deadly force across a variety of jurisdictions. Stanford social psychologist Jennifer Eberhardt and her collaborators have repeatedly demonstrated the role unconscious bias may play in influencing policing decisions. In 2017, Eberhardt and her team worked with the Oakland (CA) Police Department, and reduced the number of stops of Black citizens by over 40 percent, simply by telling officers to ask themselves why they wanted to stop that particular individual before doing so.

In this report, we offer concrete recommendations for improving public safety by selectively moving particular functions away from the police and reassigning them to other personnel. We focused on four areas where police interventions are often counterproductive and are also prone to racial bias: mental health, homelessness, traffic enforcement, and school safety. In each of these areas, we suggest non-police response options and offer implementation advice for how to approach reform.
Mental Health Crisis Response

Overview

Healthcare and criminal justice systems are facing increasing challenges from the growing numbers of individuals experiencing mental health crises. By default, law enforcement agencies and hospital emergency departments have become safety nets for this population, but they are not equipped to provide the care that individuals in crisis desperately need. As social movements for racial justice and equity gain prominence, calls for fundamental policing reforms have gained traction and become more politically viable. This presents an unprecedented opportunity to rethink current approaches to people in crisis. We outline the policy considerations cities should consider in moving away from a police-centered strategy in this area and recommend concrete steps toward building a less punitive and more effective crisis response system.

Nature of the Problem

(1) By training and orientation, police are often ill-equipped to provide appropriate help to individuals in mental health crisis.

(2) Police response to mental health crises often transforms tense encounters into serious and sometimes deadly episodes of violence.

(3) Early involvement by police often leads to otherwise avoidable criminal charges that entangle individuals in the criminal justice system.

(4) As in other contexts, when police budgets are tight, allocating officers to mental health crises diverts them from duties where they are more needed and can be better used.

Background of the Problem

Mental health emergencies can constitute around 10 percent of all calls fielded by a 911 dispatch. Unlike other medical emergencies, most mental and behavioral health crises currently result in a response from law enforcement. These calls often lead to adverse and sometimes fatal outcomes. About a quarter of police-involved shooting deaths over the last six years have been linked to mental health crises, and half of those shootings
were in a person’s own home. And contrary to the popular belief that such tragedies only affect large urban centers, these fatal encounters are more likely to occur in small and midsized metro areas.

Similarly, over two million people with serious mental illness are booked into jail each year, frequently for non-violent offenses. These individuals rarely receive needed treatment in jail, are often incarcerated for longer periods than the general population, and once released are more likely to be unemployed, more likely to be homeless, and more likely to be rearrested. Inherent bias in policing, and in the criminal justice system more broadly, can magnify consequences of mental health crises in vulnerable and marginalized populations. This is especially true for Black Americans, who are more than two-and-a-half times more likely to be killed by police than whites.

The current system is harmful to law enforcement as well. In our interviews with law enforcement officials around the country, several of them described their departments’ efforts in responding to mental health crises as time-consuming and frustrating. Officers agreed that individuals in crisis do not need jail time, they need care and resources. Unfortunately, many state civil commitment laws prevent more constructive responses to persons in crisis by requiring law enforcement officers to conduct involuntary mental health transports – eating up time and resources that could be spent on police responsibilities that contribute more effectively to public safety.

Several cities have already implemented a variety of programs to attempt to provide law enforcement with the tools needed to recognize individuals experiencing a crisis and deescalate the situation. But some of these programs, including widely used Crisis Intervention Teams (CIT) and Co-Responder Teams, are typically insufficient by themselves to address the problem. Crisis Intervention Teams provide training and resources to police officers to help them work with individuals in mental health crisis. Co-responder teams dispatch a mental health professional alongside a police officer to individuals in crisis. These programs are useful, but neither removes armed police officers from those situations that do not require a law enforcement skillset and that unarmed counselors may be better equipped to address.

Instead of pursuing half-measures, cities can better address the needs of people in mental health crises by providing healthcare and social services directly. Some cities across the country are already doing just that by creating first responder teams, integrated into 911 dispatch to respond to mental health crises in the community.
Recommendations

Program Reform Concepts and Examples

Mental Health First Responder Teams

Mental Health First Responder Teams are teams of civilians who respond to mental health crises in particular locales. Unarmed mental health counselors working in teams are well-equipped to assist those experiencing non-violent mental health crises while also saving municipalities’ and law-enforcement agencies’ resources. These teams are the most effective way to decrease harmful interactions between police and people in mental health crises, because they remove police from interactions in which they are not required.

Crisis Assistance Helping Out on the Street, or CAHOOTS, is a Mental Health First Responder Team that has operated in Eugene, OR, since 1989. CAHOOTS teams are composed of two civilian staff members, a crisis worker and a medic, who respond to calls in a city-owned van. The teams are dispatched directly through Eugene and Springfield’s 911 system. A team member calling 911 is given the option to be routed to CAHOOTS. Alternately, the 911 dispatcher can identify a call as CAHOOTS-appropriate depending on the nature of the call. If police officers responding to a call realize that a CAHOOTS team would be best situated to handle the situation, they can also accordingly request a team. CAHOOTS teams communicate via secondary police patrol channels and carry police radios, which allow the police force and CAHOOTS to be aware of each other’s actions in real time. A CAHOOTS member who needs police backup during their calls can request an officer’s presence. In 2019, CAHOOTS handled approximately 24,000 calls, about 17 percent of calls dispatched by 911. Of those calls, police backup was only requested 150 times. The city of Eugene estimates that CAHOOTS saves it $8.5 million annually in public safety spending and $14 million for ambulance/emergency room treatment.

This type of program has been implemented in numerous cities across the country. The Crisis Response Unit (CRU) in Olympia, WA uses a similar model. Relying on nurses and behavioral health specialists, the CRU is funded by the city through an annual grant and has been integrated into the city’s 911 dispatch. The CRU responded to about 700 calls within the first two months of its existence. Denver, CO, with the cooperation of its police department, launched a pilot mental health first responder team in addition to its current co-responder program in 2020. And in the wake of the global pandemic and this summer’s protests for racial justice, other cities, like Oakland, CA, Portland, OR, and New York, NY, are launching large-scale mental health first responder pilot programs.
Components of a Successful Program

There are two critical elements to implementing a successful Mental Health First Responder program: first, routing calls through existing 911 communication systems, and second, ensuring that each team consists of at least one emergency medical provider and at least one local crisis worker with experience in mental health crisis response.

911 Dispatch

911 call centers are the primary entry point to crisis services and offer assistance to people 24 hours a day, seven days a week. Dispatching mental health first responders through 911 keeps the teams looped into new and ongoing crises. As CAHOOTS Director of Consulting Tim Black said in a recent news interview:

[T]he impact of our program is most felt when it’s integrated into that 911 communication system. We’re able to divert so many calls from the police because we’re using the same priority as they are. We’re able to respond to calls that come into dispatch on 911, where somebody is experiencing a crisis. We can’t get to those calls if we’re not plugged into that system in the same way.34

While crisis lines and call centers are certainly alternatives, routing crisis calls straight through 911 is more efficient, and prevents crises from falling through the cracks.35 Routing calls in this manner allows 911 dispatch to act as a centralized hub for relaying information, and it allows emergency management professionals and crisis workers to gather on-the-ground information and approach each crisis in a comprehensive fashion.36

Team Makeup

The first responder teams should generally consist of one crisis worker and one emergency medical provider (an EMT or nurse). Pairing a crisis worker with a medical professional enables the teams to deal with a wider variety of call types and increase cost savings. Many programs staff a nurse or EMT as the professional, as a cost-effective alternative to a more advanced provider (e.g., paramedic). Given that any medical provider is limited by the medical supplies carried on program vans, nurses and EMTs are equally effective in the field.37 Similarly, hiring non-clinician crisis workers is cost-effective and increases organizational ability to hire people from the local area. Crisis workers need to have extensive experience working with people in mental health crises and
training in de-escalation techniques, but also need to be able to “build rapport and trust with clients.” Employee recruitment should focus on recruiting people from the local neighborhood, especially people with relevant lived experiences of mental health crisis, homelessness, etc. It is important to remove barriers to hiring the best possible employees, by, for instance, ensuring that policies and procedures do not bar formerly incarcerated individuals from employment. Finally, all staff members involved in the teams must undergo skills training in de-escalation, street outreach, and local mental health, and medical services.

Steps in Implementation

Program Development

Most successful programs have started with a small pilot program, which is easier to fund and allows jurisdictions to experiment to find the model that works best for them. A small team can work out the kinks with 911 diversion, best hours of operation, and other logistics before the program is scaled up. We recommend as first step a comprehensive survey of individuals from the target populations and an analysis of 911 call data to identify trends in call types, frequency, locations, and days and times mental health response is most needed. Those trends may be good starting points for a small program to start. After gathering this data and convening stakeholders, program designers should solicit feedback from local residents with varying perspectives and interests and then decide on the metrics to measure program success.

Identify and Work with Stakeholders

Collaboration with all relevant stakeholders, including existing mental health organizations and municipal departments, offers a multitude of benefits during the program design process. Outreach to existing local mental health organizations can help identify trusted partners to house the first responder team and can provide a repository of knowledge and expertise about the community mental health responders will serve. Municipal departments, such as a fire department or city public health department, may be able to house the first responder program and have some built-in advantages, including easier integration into the 911 dispatch system. Buy-in from the police department, existing emergency medical response agencies, and other local partners, is also key. These departments are often strong supporters of programs that reduce strain on their members and enable police to focus resources on crime-fighting. Including them in the design process builds trust and reduces redundancy in crisis response. Where
possible, localities should also consider regional or countywide partnerships, which enable smaller and lower-resourced cities or regions to pool resources. Engaging all relevant stakeholders in the design process can preempt problems down the line, ensuring that existing social services are not disturbed and guiding success metrics for continuing development of the program.

**Funding**

Mental Health First Responder Teams can save cities significant money in the long term, and they can also handle calls at a faster rate than police officers. By taking on services that would have otherwise been handled by the police department, the teams save money otherwise spent on police resources and overtime. The money to fund these services can be redirected from the police department to the teams.

Federal funding can also subsidize mental health first responder services. The most prominent federal source is Medicaid funding, which is available in states that have successfully applied for Section 1115 waivers. Furthermore, Congress has recently considered a bill that would provide funding specifically for these kinds of programs. Under the CAHOOTS Act, Congress would allocate $25 million for planning grants to help establish/build out mobile crisis programs, while also providing a 95 percent funding match for three years to reimburse services that the programs provide. Additional sources of funding may be available through the U.S. Department of Justice and the U.S. Department of Housing and Urban Development. Beyond acquiring federal funds or reallocating funding from the police department or other agencies, cities may also find funding streams available to start a Mental Health First Responder Team through outside grants and local taxes. And finally, as mentioned above, regional or multi-city collaboration offers the possibility of pooling resources and expanding services to broader geographic areas.
Countering Hyper-Policing of Unhoused People

Overview

Hyper-policing of encampments by police and the frequent use of 911 dispatch services for calls related to nonviolent unhoused people has increased harmful interactions between police and homeless individuals.

Nature of the Problem

Criminal enforcement is often an inapt response to the deep social and economic problems facing unhoused people, substituting for more constructive approaches to the fundamental conditions and causes of homelessness. Too many cities respond to homelessness with unnecessary and distortive use of such purportedly general laws such as loitering and vagrancy statutes, as well as the use of police to forcibly remove unhoused people from their encampments.

Background of the Problem

The number of encampments – defined as a single individual or group of unhoused individuals – has grown rapidly across the nation over the last decade. A 2018 study out of the National Law Center on Homelessness & Poverty (NLCHP) found a 1,342 percent increase in the number of media reports of homeless encampments, from 19 in 2007 to 274 in 2016, totaling 1047 media reports on homeless encampments over 10 years. Of those reports that recorded the legal status of the encampments, three quarters showed violations of local laws that put the occupants under constant threat of eviction. Four percent of the encampments were reported to be legal, 20 percent semi-legal (i.e., tacitly sanctioned), and 35 percent were soon to be or already had been closed, with no alternative housing identified for those being displaced.

Cities have responded with a variety of approaches, many of which rely on some form of criminalization of homelessness or increasing enforcement of existing ordinances. The 2018 NLCHP study found that 33 percent of 187 reported cities prohibit camping citywide, and 50 percent prohibit camping in particular public places – increases of 69 percent and 48 percent respectively from 2006. Encampment evictions are costly and often repeated, because they do not solve the underlying problem of the chronically unhoused. Honolulu, HI spends $15,000 per week (approximately $750,000 per year) sweeping encampments and Washington, DC spends $172,000 every three months on sweeps.
Recommendations

Program Reform: Concepts and Examples

Research shows, and common sense suggests, that housing is an effective way to end homelessness with a larger return on investment than traditional criminalization. Cities should adopt a two-part strategy: (1) pass ordinances that decriminalize homelessness and/or remove ordinances that criminalize homelessness from the city’s codes, and (2) establish affirmative outreach programs specifically tailored to the needs of local unhoused populations.

Variants of Permissive Ordinances

The most constructive approach combines repealing city ordinances and misdemeanor laws that criminalize homelessness and passing ordinances that limit encampment eviction. These are essential steps in reducing the frequency of unnecessary and counterproductive interactions between the unhoused people and the police. The underlying principle is straightforward: recognition that an individual should not need a permanent address to enjoy the same rights as a housed person – rights that have been and continue to be highly litigated in the last decade in favor of the plaintiff.

Some cities that have begun this transition include: Seattle, WA which struck loitering laws from its books last June, and Minneapolis, MN which repealed lurking laws in 2015.

Ordinances to Limit Enforcement Procedures Against Encampments

Other cities have passed ordinances to limit enforcement procedures against encampment evictions. For example, in Indianapolis, IN, the city must provide at least 15 days’ notice to encampment residents before they are displaced (except in cases of an emergency); catalog and provide storage for all personal items of encampment residents for up to 60 days; and coordinate with other service providers to ensure that transitional or permanent housing is available to displaced persons together with other wrap-around services for which they are eligible.

Ordinances to Legalize Encampments

Finally, some cities have passed ordinances that affirmatively legalize encampments in proper circumstances. For example, Oakland, CA has authorized homeless encampments
to be in designated “low sensitivity areas” under new restrictions. “Low sensitivity” means at least a set minimum from personal residences, schools and certain other facilities. The “sensitivity” criteria for permissive encampments can be quite controversial and thus require considerable political negotiation. In Oakland, camps in the permitted areas that break the rules and are set for closure are given a 72-hour notice, and residents are offered temporary shelter. No one is cited or arrested for camping in public spaces. However, critics argue that the “low sensitivity areas” push unhoused people toward the outskirts of the city without providing them direct services, which can compound the underlying problems facing these communities. Those problems are not necessarily inherent in proposals to legalize encampments, however, and they may be addressed by establishing outreach programs.

**Components of a Successful Program**

Each city will need to identify the needs of its unhoused population before choosing an appropriate outreach program. These programs are not mutually exclusive, and some cities may require the implementation of a variety of programs. The following specific mechanisms have proven successful in certain cities.

**Homeless Outreach Teams for the Highest Users of City Services**

In some cities, a small number of individuals place a disproportionate strain on city services. In these cities, municipal departments can collaborate to share data with each other on the city’s top users of emergency medical services, police services, and other social services. With a laser-focused outreach strategy, wrap-around services can be targeted at repeat users to help them move off the street and save municipal resources.

For example, Santa Monica, CA, developed a Homeless Multidisciplinary Street Team (HMST), which focuses specifically on locating the highest-cost users of city services and helping them obtain housing and other health and social services.

> “Our approach is we will do whatever it takes, wherever it is in order to meet our clients.” – Zack Coil (Program Director, HMST, The People Concern)
San Diego, CA also implemented a pilot program following this model. The city identified the 25 highest-cost users of emergency medical services in the country and immediately placed them in permanent supportive housing. While the program itself was successful, the pilot stopped after three years when San Diego struggled to secure additional funding for a permanent operation.

**Onsite Services Provided by Roving Street Teams**

This approach is best for a city that is dealing with severe substance abuse and mental health issues or a homeless population that is resistant to receiving care in hospitals. Medical staff pair up with homeless outreach workers to meet unhoused people wherever they and assess unhoused patients and establish plans for care.

San Francisco, CA has established a roving street team to provide these kinds of services. Street Medicine and Shelter Health in San Francisco pairs a medical staff member with a homeless outreach worker to assess unhoused patients and establish care for chronic medical, mental health, and substance use conditions using an “adapted patient-centered medical home model.”

> “People are capable of making incredible changes in their lives. Because we can’t predict who is going to make these changes, we should treat people with dignity and respect and prioritize the least palatable person to enter a program.” – Dr. Barry Zevin (Medical Director, Street Medicine and Shelter Health, San Francisco Department of Public Health)

**Low-Barrier Shelter Model with Wrap-Around Services**

This strategy is best for a city with financial resources, public buy-in, and a commitment to embracing the unhoused people where they currently are while assisting them on their journey to permanent housing.

San Francisco, CA has also established several Navigation Centers, the nation’s first low-barrier homeless shelters, in areas with large homeless encampments. These centers differ from typical shelters because they are open 24 hours a day, residents can come and go as they please, and residents can bring their partners, pets, and possessions.
Another city that has successfully implemented this approach is Las Cruces, NM. The city has embraced a 50-person homeless encampment in its city, offered unhoused people self-governance and a legal place to store belongings during the day and night, and offered health and social services onsite.71

“If you give people an opportunity to shine, oftentimes they will. We have seen that over and over.” – Nicole Martinez (Executive Director of Mesilla Valley Community of Hope)72

**Steps in Implementation**

**Program Development**

In developing and implementing non-police strategies for addressing the needs of unhoused populations, cities should attend to available data and make use of professional analysis, but also consult with a broad range of city residents, including unhoused individuals themselves, in order to take account of conditions on the ground and ensure broad buy-in. Direct services should be provided at or near homeless encampments, to ensure that advocates and agencies are able to do effective outreach.

**Identify and Work with Stakeholders**

In addition to consulting with residents, cities designing and implementing non-police responses to homeless encampments should also engage with relevant city agencies, including not just police but also fire, EMT, and city attorneys, to share qualitative data, build off existing government infrastructure, and leverage the city or county’s legal apparatus. The goal is two-fold: to tap into all forms of relevant expertise, and to ensure buy-in from relevant agencies as well as from all sectors of the public.
Funding

Localities in certain states that have Medicaid waivers can use Medicaid funds to fund their affirmative outreach programs. In addition, some cities have pursued grant funding from the U.S. Department of Housing and Urban Development (HUD). HUD provides the Emergency Solutions Grant (ESG) to eligible metropolitan cities and urban counties for these localities to engage in street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, or establishing or operating a Homeless Management Information System (HMIS). HUD also provides “Continuum of Care” funding to nonprofit organizations, state and local governments, and public housing agencies to assist individuals and families experiencing homelessness to promote the goal of long-term stability. The program funding focuses on permanent housing, transitional housing, supportive services, and, in some cases, homelessness prevention. Finally, some jurisdictions may be able to secure grants from non-profit organizations to fund outreach programs.
Traffic Enforcement

Overview

Traffic enforcement is the most common interaction between American police and civilians.\textsuperscript{77} It heavily influences how civilians view the police and, in particular, whether officers are perceived as trustworthy, fair, and equitable.\textsuperscript{78} Unfortunately, traffic enforcement can also be dangerous, not just for officers but also for motorists and passengers stopped by the police. Traffic enforcement has been the starting point for a distressing number of violent encounters between the police and civilians and has repeatedly led, in particular, to the deaths of people of color stopped by the police.\textsuperscript{79}

Nature of the Problem

The current debates over police and traffic enforcement raise these concerns:

(1) Broad police discretion under the Fourth Amendment permits capricious and racially biased auto stops and can lead to criminal charges that replicate the problems of caprice and bias.

(2) These stops often lead to otherwise avoidable use of force and deadly force by the police.

(3) Giving police the dominant role in traffic enforcement does not advance the goal of safety but instead inefficiently displaces more effective non-police approaches and, as in other contexts, misallocates constrained police budget resources.

This report focuses on the first enforcement stage of traffic enforcement, beginning with a stop and extending until an arrest is made, a citation is issued, or the officer ends the interaction. The second enforcement stage, which encompasses arrest or citation through the imposition of punishment, presents its own unique set of challenges that are best addressed through broader justice system reforms focused on fair fine and fee structures rather than policing \textit{per se}.\textsuperscript{80} For more information on the issues inherent to the second enforcement stage of traffic enforcement, see Appendix D.

Background of Problem

Police enforcement of traffic laws creates inequity in enforcement due to the size of state traffic codes and the wide latitude granted to individual officers in deciding when and
how to enforce them. Traffic codes are filled with minor offenses that are commonly and often unwittingly violated, giving police almost limitless discretion to stop nearly any driver, and the requirement that courts accept any such reason given for a stop without prying further hides an officer’s motivations for any stop (including impermissibly racially-biased ones) from judicial scrutiny.\textsuperscript{81}

Even when it does not result in violence, the current discretionary regime of traffic enforcement by the police undermines the legitimacy and democratic responsiveness of local institutions. The invasive and ubiquitous nature of modern traffic policing can erode trust in police and government overall, particularly in the marginalized communities that bear the brunt of such policing enabled by our laws and policy choices.

In the 1990s, Americans became familiar with the term “Driving While Black” and the problem of racial disparities in traffic stops gained widespread attention. In one of the first and most prominent suits challenging racial biases in traffic stops on the New Jersey Turnpike, the court found that while only 14 percent of cars on the road carried at least one Black person, and while Black and white drivers violated traffic laws at the same rate, almost half of the stops made by police were of Black drivers – a massive statistical outlier.\textsuperscript{82} The court also found that police divisions charged with making discretionary stops for drug interdiction stopped double the number of Black drivers.\textsuperscript{83}

Manifestations of profiling in traffic stops have hardly abated. As recently as 2019, a national study found that Black and Latinx drivers were more likely to be stopped and searched than white drivers.\textsuperscript{84} These results should not surprise anyone familiar with policing discretion and pretextual stops. The presence of nearly unfettered police discretion to make analogous pedestrian stops under “stop and frisk” regimes has come under substantial fire in recent years as allowing indiscriminate harassment of Black and Latinx civilians without substantial benefits in crime reduction.\textsuperscript{85}

Studies have also found that Black drivers are more likely than white drivers to be pulled over by police for “more arbitrary” reasons, and that twice as many Black drivers as white drivers are stopped for the kinds of “highly discretionary” traffic code violations often used in pretext stops.\textsuperscript{86} Ultimately, scholars argue, the evidence shows that “virtually all of the wide racial disparity in the likelihood of being stopped is concentrated in one category of stops: discretionary stops for minor violations of the law.”\textsuperscript{87}

Furthermore, data shows that violence by police is a far more likely result of any given traffic stop than violence against the police. While Bureau of Justice Statistics show that police use physical force against 1.5 percent of stopped drivers (and 6.7 percent of Black drivers), research by Jordan Blair Woods shows that officers are assaulted at the rate of one assault in every 6,959 stops (.01 percent).\textsuperscript{88}
To date, relatively few municipalities have taken meaningful steps to curb police discretion in traffic enforcement. This may be because many police departments rely on traffic ticket revenue to fund state and local budgets,90 and because traffic stop rates are considered a staple measure of officer performance.90 Moreover, although there have been occasional efforts by localities to reduce particular, unpopular forms of traffic enforcement, these generally have not significantly curbed police interactions with vulnerable populations.91

But momentum may be shifting. In February 2021, Berkeley, CA, approved a halt to routine traffic stops by its police department, as part of a comprehensive plan to achieve structural police reform. The city is reassigning traffic enforcement to unarmed civil employees.92 Other municipalities are considering similar reforms that would remove police from traffic enforcement to varying degrees.93 Even where removing police entirely is off the table, the discretion that police have specifically with respect to traffic is increasingly recognized as inequitable and inefficient.94 The moment may be ripe for sensible, researched, and tailored change.

Several AAMA mayors made clear that they are committed to traffic enforcement being limited to road safety rather than other objectives, such as aiding ordinary law enforcement efforts or generating revenue through citations. For example, Mayor McKinley Price, President of the AAMA and mayor of Newport News, VA, emphasized as much when he told us that in his city, the main traffic enforcement goal is to achieve safety, not to supplement criminal law enforcement or generate revenue.

**Recommendations**

**Program Concepts and Examples**

To address these problems, cities should craft local law and policy to reduce opportunities for police abuses by banning or restricting pretext stops and focusing on environmental solutions to traffic safety issues. Additionally, they should seek to implement automated and non-police enforcement of traffic laws. Where state laws restrict the ability of localities to adopt these measures, cities should seek necessary legislative change at the state level. By claiming authority for their polities to decide the
best means of ensuring traffic safety, cities can institute fairer, more effective, and more community-oriented solutions to this pressing public safety problem instead of being shackled to a reliance on armed policing.

Several jurisdictions around the country have moved to curtail pretext stops. For example, a traffic code amendment passed by the Virginia State Legislature last fall to restrict pretext stops limits officers’ authority to issue citations for vehicles with ineffective mufflers, broken tail lights, tinted windows, or objects obstructing a driver’s view (as well as officers’ authority to issue citations for possession of marijuana or search solely on the basis of its smell) without probable cause to pull over the driver for a more serious traffic offense or a criminal offense. The Texas State Legislature is considering limiting the practice as well, and the state supreme courts of Washington, Oregon, and New Mexico have already banned pretext stops. And in 2019, after a Los Angeles Times investigation into the Los Angeles Police Department Metropolitan Division found that its focus on huge volumes of vehicular pretext stops as a crime suppression tactic resulted in an arrest once in every 100 stops but led to Black drivers being stopped at a rate five times their share of the city’s population, the city’s Chief of Police committed to drastically cutting back the program. Since 2016, the Oakland Police Department has instituted a policy of declining to make traffic stops for violations that pose no immediate safety threat, which has resulted in a reduction in the number of discretionary stops by 36 percent (63 percent for Black drivers—although racial disparities remain).

Implementing strategies to create “self-policing streets” improves traffic safety while reducing the need for traditional traffic policing by armed officers, thereby reducing the inequities and violence of the traffic policing status quo. Experts credit New York City’s first-in-the-nation adoption of a Vision Zero plan focused on such road redesigns (as well as public education and narrowly targeting police enforcement to specifically dangerous activities) with its successes in reducing traffic fatalities, which run counter to national trends in the same time period. In some places, adding protected bike lanes and other safety improvements helped cut speeding by 50 percent and crashes resulting in injury by nearly two-thirds.

Since New York City became the first American city to institute speed cameras in 1992, the Insurance Institute for Highway Safety reports that 156 cities across 16 states and the District of Columbia have implemented some type of speed camera system. Speed cameras are effective at reducing speeds and crashes: a 2017 analysis of 28 international studies found that instituting speed camera programs resulted in up to a 49 percent reduction in crashes, and a 30 to 40 percent reduction in death or serious injury. In New York City, cameras typically reduce speeding violations by 50 percent in their first year of operation.
Speed cameras are also efficient: in practice, they issue up to ten times as many tickets as police even with limited locations and hours of operation.\textsuperscript{106} Therefore, camera programs allow cities to drastically reduce the value of each ticket and avoid subjecting drivers to opportunities for biased police discretion and fines they cannot pay, promoting equitable treatment of their citizens in speed enforcement. In New York City, for example, fines issued by speed cameras are $50, whereas a summons from a police officer for the same offense can be up to $600, and can carry additional fees, insurance penalties, and DMV points.\textsuperscript{107} The program more than pays for itself: from 2014 to 2017, the city spent $99,694,868 on speed cameras that generated $183,450,718 in revenue.\textsuperscript{108}

Finally, speed cameras are recognized as an effective and just means of ensuring traffic safety by a broad spectrum of city residents. In 2016, a survey of New York City voters found that 78 percent of Black respondents, 79 percent of Hispanic respondents, 80 percent of low-income respondents, and 60 percent of car owners supported expanding the number of cameras and hours of operations of the city’s school zone speed camera program.\textsuperscript{109} Other surveys found 71 percent of drivers and 90 percent of non-drivers in Washington, DC supported the use of speed cameras, as did 77 percent of drivers in Scottsdale, AZ.\textsuperscript{110}

Several jurisdictions have also explored moving traffic enforcement away from the police. Oakland, CA, established a Department of Transportation in just over a year by consolidating functions spread across other city agencies, chiefly the Department of Public Works.\textsuperscript{111} Oakland has recently begun transferring its crossing guard program from the Oakland Police Department to the Oakland Department of Transportation.\textsuperscript{112} Last summer, Philadelphia’s budget shifted $12.3 million for crossing guards from its police department to its Managing Director’s Office,\textsuperscript{113} in addition to $1.9 million for “public safety officers,” a new type of non-police city civil servant created by a 2019 referendum. The officers will be unsworn and unarmed, and will be authorized to issue citations, but not arrests, for certain traffic and quality of life offenses.\textsuperscript{114}

**Key Components of a Successful Program**

By reducing police officers’ authority to make pretextual stops, deemphasizing the issuance of paid citations, and instead focusing on effective environmental design interventions to create “self-policing” streets, cities can move away from a status quo that generates inequitable police enforcement of traffic laws and pivot towards one that increases traffic safety.
1. Ban or Restrict Pretext Stops

By local law or policy, cities should neutralize opportunities for pretext stops by precluding their police officers from citing drivers for minor violations of their states’ traffic codes. Any benefits of pretext stops are outweighed by their substantial harms. In addition to comprising the main driver of racial disparities in traffic policing and a significant opportunity for police violence, there is little evidence to suggest that discretionary pretext stops are a particularly effective means of pursuing law enforcement or traffic safety goals. State-level analyses of the low “hit rate” of traffic policing (the rate at which contraband is discovered as the result of a traffic stop) abound. To cite one typical example, a 2020 report by the California Attorney General found that only 0.6 percent of traffic stops resulted in the seizure of weapons or ammunition, and only 1.3 percent resulted in the seizure of narcotics.115

2. Create “Self-Policing” Streets and Automated Enforcement Programs

Cities should focus on fixing traffic safety by addressing it directly with Vision Zero plans, particularly traffic safety-focused infrastructure improvements and speed reductions, which will reduce the need for policing by creating streets that keep themselves safe. In the wake of this summer’s racial justice protests, Vision Zero advocates are rethinking the role of police enforcement in road safety programs and are instead opting for fixes to address the root causes of traffic violence and inequity.116 Advocates note that high-injury networks that map closely to underserved, racially marginalized communities in cities across the country, and that less than half of low-income communities in American cities have sidewalks.117

Speed camera systems can reorient cities towards a focus on safety as the central tenet of traffic enforcement by encouraging drivers to follow speed limits and drive carefully without relying on the terror and inequitable enforcement that can accompany police enforcement of traffic laws.118 Additionally, reducing the role of police in traffic enforcement also frees up police officers to focus on more serious crimes.119 Finally, when well-designed, speed camera systems can provide additional revenue for local governments without exploitation of inequities of race and class.120

Where necessary, cities should request state authority to lower speed limits and institute speed camera programs from their states in order to further automate enforcement.
3. Establish a Civilian Traffic Agency

Since last summer, cities across the country have been investigating the prospect of transferring responsibility for traffic code enforcement from police to unarmed, non-police civilian officers under the authority of a Department of Transportation. Heeding the call from their residents to shift from a reflexive reliance on armed police to provide a wide range of city services, these cities are turning towards civilian enforcement of traffic codes as a more fair and effective means of providing public safety on the roads while conserving police resources to address situations that require a traditional police response. Recent polling in some cities finds this reform to be broadly popular, backed by a majority of voters.¹²¹ Unarmed non-police civilian officers drastically decrease police-civilian interactions, which could help de-escalate traffic encounters,¹²² increase fairness and equity,¹²³ increase police efficiency in other areas,¹²⁴ and improve public perception of police officers.¹²⁵

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International examples exhibit the possibility and utility of civilian enforcement of traffic laws. Law professor Jordan Woods highlights New Zealand’s long history of traffic enforcement by non-police traffic officers as a successful model of public safety that does not rely on policing.¹²⁶ Beginning in the 1930s, New Zealand’s municipalities created departments of transportation to handle traffic violations, which were eventually centralized into the nationwide Ministry of Transport’s Traffic Safety Service until its merger with the national police in 1992.¹²⁷ TSS officers, distinct from police and lacking their general law enforcement authority, were largely responsible for road safety.¹²⁸ Although police retained the authority to enforce traffic codes, the TSS did most of the nation’s traffic enforcement.¹²⁹ A 1971 comparative study with Australia revealed that New Zealand’s “low discretion” approach to traffic enforcement¹³⁰ led to more positive community perceptions of their police.¹³¹ Additionally, in the estimation of the president of a New Zealand police union, the 1992 merger of the TSS into the national police led to increased speeds, lower compliance, outrage over ticket quotas, and lower public confidence in the nation’s traffic enforcement capabilities.¹³² Anecdotally, former TSS officers lamented the merger, regretting that the TSS’ “ethos” that focused on “a passion for road safety and an ideal of saving injuries and lives...wasn’t carried over at the time of the merger.”¹³³
In July, Berkeley, CA became the first American locality to apply this de-policing framework to the context of traffic enforcement. After hours of emotional public testimony, council members approved an omnibus police measure that calls for cutting the police budget by half and initiates a community engagement process to reimagine policing, including by creating a Berkeley Department of Transportation whose unarmed officers, rather than police, would enforce traffic laws.134

Where necessary, cities should seek amendments to state law that would delegate authority to broadly enforce state traffic codes, traditionally reserved to the police, to unarmed, non-police civil servants. Unarmed police or non-police “traffic monitors” would not retain the typical powers of sworn police officers. They would not, for example, have the authority to detain, search, arrest, or, fire a weapon.135 Their authority would be strictly limited to the performance of traffic monitoring, which could include initiating traffic stops for traffic code violations, requesting documentation, and issuing traffic citations. Serious traffic violations, such as driving without a license or driving under the influence, and non-traffic criminal violations, would still be handled by the police. Traffic monitors could call in for additional police support if they encounter these types of offenses in the course of their job.

Steps to Implementation

Program Development

1. Assess and Address State Law

Cities in 21 states where the law requires state permission for localities to implement speed camera programs should petition their state legislatures for the authority to do so.136 Cities in the five states where the law prohibits speed camera enforcement should advocate for state law changes permitting the use of speed camera programs.137

Certain police reforms, particularly those that touch on the role of police in enforcing vehicle codes, may be preempted by exclusive state authority to regulate in this field, which presents a challenge for cities attempting to enact such broad structural reforms without state approval. Broadly, cities do not have powers that are not specifically enumerated by their state. Thus, the specific grants of authority in city charters will determine the extent to which some cities can unilaterally reform their own individual police forces in this area. Cities should seek state permission via statute to pursue many of the structural reforms we suggest to avoid litigation.

Cities seeking to empower officers of a civilian traffic agency to enforce traffic laws must contend with the fact that state vehicle codes may restrict the authority to enforce moving
violations to statutorily defined peace officers, preempting localities from delegating this role to non-police civil servants staffing a civilian traffic agency (as will be discussed further below). Cities should be aware that state law changes, such as an amendment to the vehicle code, may be necessary to give a civilian traffic agency’s officers the authority to enforce traffic violations.

If a city is unable to receive state permission for such reforms, then the possibility of making such reforms unilaterally will depend on the city’s Home Rule authority. Forty-four states have granted some municipalities some Home Rule charter powers, and while most cities have some form of Home Rule power, each differs in its specific charter language and how it is interpreted by past courts.

2. Develop “Self-Policing” Streets and Automated Enforcement Programs

Cities should develop engineering solutions to road safety. Low cost, high impact engineering solutions that can generally be unilaterally implemented by cities include expanding pedestrian curb space with the use of painted bulbs, re-painting bike lanes and crosswalks, and re-timing signals at dangerous intersections. Where in-person enforcement is still used, it should be precisely deployed to address specific issues (such as DUI and failure to yield) that have been identified as problems in targeted areas in order to avoid casting too wide of a net of discretionary policing. Cities should also reduce speed limits as permitted by state law. In Seattle, WA, lowering speed limits from 30 to 25 miles per hour by modifying signs on select city roadways (without any other interventions or increased enforcement) resulted in an 18 percent decrease in crashes causing injury or death, a 22 percent decline in crashes overall, and a 54 percent reduction in speeding over 40 miles per hour.

To ensure successful speed camera programs regardless of size, municipalities should review data to empirically determine areas where camera placement is most needed to reduce traffic collisions and average traffic speed. While many municipalities contract with third-party vendors to process and send speed camera images back to sworn officers to determine whether a citation should be issued, best practices counsel that cities have civilian Department of Transportation officers perform the initial review and citation issuance, (as is already done in New York City). Once issued, the citation would be mailed to the cited driver with camera images, a description of the particular offense, and notification of their opportunity to appeal.

Speed camera enforcement should attempt to mirror that of traditional policing in that a citation will not be issued for negligible speeding a few miles per hour over the limit. This
“safe harbor” should be determined city by city. Maryland’s speed camera program does not issue a citation unless a driver is traveling at least 12 miles per hour over the speed limit, which is a helpful bar.\textsuperscript{144}

Citation rates should be low enough to ensure payment but high enough to justify camera costs. This again will depend on median income of the city and past collection rates. While we recommend warning citations should be used for firsts violations and that the scale should be graduated, setting an initial cost that is not overly burdensome is key. Maryland, which set its maximum infraction at $40, has seen success in collecting ticket revenues.\textsuperscript{145} Reports show that at least between 2007 and 2009, less than one percent of drivers cited in Maryland appealed their citation.\textsuperscript{146}

To avoid creating incentives for specific actors to increase citations, revenues should be managed to ensure that funds generated by speed camera programs are not routed to police departments or cities’ general funds. Instead, they should be funneled into defraying the costs of the speed camera program, ongoing traffic safety efforts such as street improvements and education campaigns and offsetting the costs of a more comprehensive Department of Transportation envisioned by our recommendations.

\textbf{3. Transfer Traffic Enforcement Duties and Abolish or Curtail Pretext Stops}

Cities that do not already have one should establish a municipal Department of Transportation responsible for road engineering, capital projects that focus on traffic safety and reviewing speed camera data. To the extent feasible, traffic enforcement responsibilities should be transferred from the police to the Department of Transportation, or another civilian agency.

State law changes should be pursued if necessary. Los Angeles, CA, whose City Council is currently exploring options to transfer traffic enforcement from the Los Angeles Police Department to its well-established Department of Transportation, has successfully pursued this type of amendment in the past.\textsuperscript{147} In the late 1990s, in order to combat the city’s problems with unlicensed “bandit taxis,” the Los Angeles Department of Transportation created a special unit of non-police “Transportation Investigators” whose responsibilities included impounding unlicensed taxis.\textsuperscript{148} When an adverse superior court decision held that these officers were not “peace officers” with authority under California’s vehicle code to impound vehicles, the city advocated for and sought a state legislative amendment to the code specifically authorizing “designated local transportation officers” to enforce the city’s taxicab regulations.\textsuperscript{149} While this amendment was narrowly cabined to address a specific problem – it defined designated transportation officers as “any local public officer employed by a local authority to investigate and
enforce local taxicab and vehicle for hire laws and regulations” – it represents a legal avenue that could be used to delegate broad authority to non-police civil servants in the enforcement of traffic laws.\textsuperscript{150}

Even where police retain responsibility for some or all traffic enforcement, cities should seek to end or heavily restrict pretext stops.

Funding

Ending the use of pretextual stops is a policy choice that could be issued as a directive from a city's police chief without any additional outlay of funding. The same is true for implementing use of warning citations for first-time offenses. While these policies may result in fewer citations being issued, a fair automated enforcement system could help make up the shortfall. While enhancing street infrastructure in underserved neighborhoods would require additional funding, the scope of such projects will be city-specific and would not necessarily require large-scale capital investments. Furthermore, the savings created by fewer crashes and safer streets, while difficult to quantify fully, could defray the overall cost to the city of such improvements.

Camera systems are not free,\textsuperscript{151} but they can pay for themselves via the increased revenue that they can offer cities. In New York City, camera systems are quite remunerative, capable of bringing in over $10 million in just one month,\textsuperscript{152} which easily offsets their operational costs. Maryland is also experiencing an increase in revenue due to its camera system. In 2018, with a statewide program, it reported $64 million in ticket revenue.\textsuperscript{153} While some smaller cities have experienced a decrease in citation revenue since implementing speed camera programs,\textsuperscript{154} this may be due to suboptimal camera placement.

Our recommendation with the largest implication for municipal budgets is the creation of a civilian traffic safety and enforcement agency. The costs of the new agency could be mitigated by shifting staff and funding previously used to support police execution of traffic-related functions to officers of the new agency, by establishing new funding streams, and by applying for expanded federal funding of new public safety initiatives. In addition, some cities have created new funding streams by ballot initiative or city ordinance. For example, Oakland, CA approved Measure Y in 2004 and extended its provisions in 2014 for a decade to create new parcel and parking taxes to fund violence prevention programming and the local police and fire departments.\textsuperscript{155} Cities also can seek funding from federal programs designed to help localities acquire resources to reform their police, such as President Biden’s promised $300 million investment in the U.S. Justice Department’s Community Oriented Policing Services (COPS) Office.\textsuperscript{156}
School Safety

Overview

This section of the report focuses on the effects school resource officers (SROs) have on student safety and well-being. This past summer, students and educators joined the chorus of voices calling for meaningful change to public safety. Their message: Remove police from schools.\textsuperscript{157} While dozens of school districts heeded this call by terminating or limiting SRO programs,\textsuperscript{158} others rejected it, often citing safety concerns.\textsuperscript{159} Most of the mayors interviewed for this report balked at the idea of removing police from their local schools and expressed little urgency toward reforming SRO-related practices. In fact, almost across the board, these mayors described their local SROs as highly successful at preventing crime and building meaningful mentorships with students.

Nature of the Problem

The controversy over school police offers center on these concerns:

(1) Police presence harms the learning environment.

(2) Police in school buildings sows distrust of police in young people.

(3) Even without police, school disciplinary schemes in many places is disproportionately imposed on children of color; police involvement exacerbates this skewing by leading to criminal charges and thus contributing to the “school-to-prison” pipeline.

Background of the Problem

School policing is a relatively recent phenomenon. Flint, MI ushered in the first SRO program in the 1950s, but it would be decades before the practice took off on a national scale.\textsuperscript{160} In 1975, only about one percent of principals reported having police stationed in their schools.\textsuperscript{161} The tragic mass shooting at Columbine High School in 1999 stirred calls for greater school security.\textsuperscript{162} That year, the U.S. Department of Justice initiated the “COPS in Schools” grant program, which diverted hundreds of millions in federal funding for hiring SROs.\textsuperscript{163}

Today, police roam the halls of about 45 percent of the nation’s public schools.\textsuperscript{164} Nationally, more than half a billion dollars are spent on SROs each year, while other critical school services face chronic underfunding.\textsuperscript{165} For instance, 1.7 million students
attend schools with police but no counselors and 10 million attend schools with police but no social workers.166 Black students in particular are three times more likely than their peers to attend schools with more security staff than mental health personnel.167

School shootings continue to contribute to a public perception of schools as dangerous places,168 and shootings and other safety concerns remain the primary rationale among the U.S. public for maintaining SRO programs.169 A majority of American parents feel that police make schools safer.170

In actuality, students are far safer at school than outside of it. For instance, in the most recent year for which data is available, only 1.1 percent of homicides of victims aged 5-18 occurred at school.171 Moreover, juvenile crime rates have dropped by 75 percent since 1996,172 mirroring a downward trend in crime generally.173 Moreover, evidence that SROs actually increase school safety is mixed at best.174 Studies indicate SROs do not deter school shootings, although data is limited on this topic.175 Most (but not all) of the credible studies of SROs’ impact on all crimes committed at schools find SROs do not increase school safety.176 And several studies conclude SROs can increase student misconduct.177

Other effects of SROs are more consistent across studies. Multiple studies find that the presence of SROs correlates with increased crime reporting at schools.178 Many studies find their presence correlates with increased arrests, expulsions, and suspensions.179 Many proponents of SROs note a correlation between SROs, higher standardized test scores, and less truancy, though opponents point out this likely results from heightened expulsion rates of ill-behaved students.180

In the face of conflicting data, both proponents and opponents of SRO programs often turn to qualitative analyses of students’ feelings toward SROs. Numerous studies show that most students have positive feelings about their SROs and feel safer with SROs around.181 However, these findings vary significantly by race, with substantial numbers of students of color reporting feeling less safe with SROs around.182

Many proponents also contend that SROs foster positive perceptions of law enforcement among youth.183 SROs themselves view positive law enforcement messaging as central to their role. One study found that SROs consistently cited encouraging students to trust police “as their second-highest priority, safety being the first.”184 One officer summarized, “we’re wanting to make sure that those kids know that… police are not the bad guys.”185 The study also finds that officers pay particular attention to encouraging students of color to trust police.186 Opponents question whether this type of messaging is appropriate in a school setting, noting that students have valid concerns about systemic racial discrimination and abuse in policing and should be free from anxieties associated with
police while at school.\textsuperscript{187} Regardless of where one stands in this debate, research suggests that SRO programs have no effect on student perceptions of law enforcement more broadly.\textsuperscript{188}

In addition to concerns about SRO efficacy, a growing number of reports have raised alarms about systemic consequences associated with stationing police in schools. A spate of incidents in which police used excessive force against school children vividly illustrate critics’ concerns about SRO programs. Some of these cases appear to be isolated incidents, such as a highly publicized case in which a deputy threw a black high school girl to the floor.\textsuperscript{189} Other incidents reflect broader patterns. In one Alabama district, school police deployed a military-grade chemical gas against predominately Black students more than one hundred times over four years, often for minor disciplinary issues, such as back-talking.\textsuperscript{190} Similarly, multiple highly publicized incidents involve SROs handcuffing children as young as five years old for throwing temper-tantrums.\textsuperscript{191} These episodes illustrate a concerning statistic: Over a five-year period, police arrested more than 30,000 children ages nine and younger.\textsuperscript{192}

Even in schools free from excessive force incidents, SRO programs inadvertently harm students in less conspicuous ways. Studies have thoroughly documented a strong causal connection between SRO programs and the school-to-prison pipeline, which is characterized by the criminalization of ordinary childhood and adolescent behaviors. Even controlling for factors such as neighborhood crime rates and general levels of crime and disorder at a school, national data reveals that students in schools with SROs are far more likely to face law enforcement referrals and arrests, especially for minor offenses like “disturbing the peace.”\textsuperscript{193} Disturbing the peace arrests include offenses such as violating school dress codes, tardiness, and bringing a cell phone to class.\textsuperscript{194} Even when students are not convicted or incarcerated, arrests can impact the trajectory of their lives. For instance, a review of national data found that “even after controlling for other relevant factors, a first-time arrest during high school almost doubles the odds that a student will drop out of school, and a court appearance associated with an arrest nearly quadruples those odds.”\textsuperscript{195}

Criminalization of normal student behavior is disproportionately imposed on students of color. For example, Black students make up less than 16 percent of school enrollment nationwide, but account for more than 33 percent of student arrests.\textsuperscript{196} These trends comport with a study of SRO attitudes toward students of color. The survey found that officers in a predominately white and affluent school district viewed outside intruders as the main safety concern, whereas in a low-income district in which students of color predominated, officers perceived students as the primary threat.\textsuperscript{197} Juvenile crime rates in both districts were comparable.\textsuperscript{198}
The bottom line is that the available evidence fails to conclusively demonstrate that SRO programs increase school safety, but SRO programs do often contribute to the school-to-prison pipeline and make some students, most often students of color, feel less safe at school. Eliminating SRO programs presents an opportunity to mitigate these negative impacts and shift resources to evidence-based approaches to youth wellness.

Because school districts vary, and some cities may not consider removal of SROs feasible or desirable, this report provides two other, alternative recommendations: limiting and defining the role of SROs, and improving hiring and training practices. The three approaches are not mutually exclusive. Each provides useful guidance for decision-makers concerned with school discipline and crime, with or without police involvement.

In both opinion polls and conversations with the authors, SROs and other law enforcement officers explained that school administrators often fail to understand the proper role of an SRO. Officers lamented that their attempts to build positive relationships with students were often hampered by teachers calling on them to enforce disciplinary rules. A recent study concluded that most California schools give staff complete discretion to decide when to involve police in student misbehavior. Less than four percent of the schools had policies limiting police contact for rule-breaking or minor offenses. Activists are also highly critical of SROs’ involvement in school discipline, noting the potential for SROs to use excessive force or arrest students for classroom disruptions. Furthermore, studies show that school administrators often treat SROs as legal advisors when they are unsure if conduct is criminal, and SROs often respond with formal processing, leading to more legal actions for minor misconduct.

An MOU between the police department and school district can spell out:

1. When SROs or off-campus police will be called to deal with student misbehavior
2. Whether school officers should carry weapons or restraints, and what kinds
3. Who retains responsibility for overseeing the officer’s behavior
4. How interactions with students will be documented
5. Guidelines as to when officers can arrest students or enter their information into police databases
6. The rights of students to remain silent or have an adult present during police questioning
7. When police officers may remove students from campus
Another issue SROs face is that state laws and school policies often take an explicitly punitive approach to discipline. At the same time that federal funding for SROs grew, states began legal reforms requiring mandatory reporting to police for more crimes, and many school districts instituted zero-tolerance policies through which students would be expelled, suspended and/or sent to juvenile court for minor offenses such as drug possession.205

Recommendations

Program Concepts and Examples

Strategy One: Removing School Police

For school districts that fund their own SRO program, removing SROs could result in significant cost savings that could enable the hiring of counselors, social workers, or psychologists; instituting restorative justice initiatives and positive behavioral programming; or raising teachers’ salaries. Since June 2020, school boards across the country have voted to remove police from schools in the wake of both Black Lives Matter protests and budget cuts due to COVID-19.206

Thousands of schools have long functioned without SROs, but given how recently SRO programs began, there is little public data on whether and how school districts have successfully ended SRO programs in the past.207 School boards have thus looked beyond the United States for a model. In 2017, the Toronto City School Board terminated its contract with police after conducting a comprehensive review of the role SROs played in schools.208 Although most students, teachers, and parents viewed SROs positively, many students of color felt unsafe and overly surveilled.209 The district replaced SROs with civilian “safety monitors” and developed a detailed protocol for when school staff must call police.210 Additionally, the local police maintain “school engagement teams” assigned to groups of schools that continue building relationships and investigating crime as needed.211 In conjunction with a broader push toward reducing punitive practices within schools, removal of embedded officers led to fewer expulsions and suspensions the following year.212

A lesser-known example of school de-policing is Schenectady City School District in New York. Several years ago, the district removed school resource officers and replaced them with social workers, civilian safety officers, and other sorts of “cultural brokers” who intervene in and deescalate conflicts among students.213 Since making these changes and adopting other “healing-centered” strategies, the district has seen a 40 percent reduction in public altercations at their schools.214
Beyond these success stories, local organizations and national nonprofits have been developing comprehensive guides on de-policing schools for decades. The past year saw some cities implement these plans. For example, in June 2020, the Oakland Unified School District Board voted to eliminate the Oakland Unified Police Department entirely, building on a decade of local activism from the Black Organizing Project. The board envisions broadly restructuring the role of school safety personnel to focus on equity, restorative justice, and trauma-informed practices over punitive measures. The board directed the superintendent to reallocate over six million dollars currently dedicated to maintaining the police force toward student support positions, including social workers, psychologists, restorative justice practitioners, or other mental and behavioral health professionals. A community safety committee led by the Black Organizing Project has been tasked with creating a plan to ensure campus safety. As of January 2021, the committee had completed Phase One, which consisted of assessing the gaps left by the police department and creating new hiring plans and decision structures to respond to crises. Phase Two will consider longer-term changes to promote a positive school climate, including the establishment of a new position entitled “Culture and Climate Ambassadors” to play many roles previously filled by SROs.

Non-profit organizations’ model safety plans appear in Appendix E. All model safety plans included in this report emphasize the need to introduce new safety planning measures and protocols to fill the role previously held by SROs. None of the proposals recommend implementing a system where the police are never called to the school. Situations with active shooters, bomb threats, or other serious crimes will still likely require law enforcement intervention. A comprehensive safety plan will help all parties understand when law enforcement involvement can help, and when regular school discipline can suffice.

These plans also emphasize the importance of investing in new support staff with backgrounds in conflict resolution, adolescent psychology, and social work. Several school districts have been criticized for symbolically removing SROs but rehiring the same personnel under a new title. Although many students do have positive relationships with SROs, non-law enforcement personnel who are trained in working with youth may be better suited to build these important relationships. School districts must invest time and resources into filling any gaps left by SROs’ removal and cultivating a safe school climate for all children.

**Strategy Two: Limiting & Defining the Role of Police in Schools**

Districts that are not ready to fully remove SROs from their schools would do well to undertake a comprehensive review of the services SROs currently provide and consider
limiting those roles going forward. Carefully defining the roles officers play and ensuring that all school staff understand those limitations and responsibilities, can help protect students from unnecessary law enforcement intervention and protect officers from assuming inappropriate disciplinary responsibilities.

In light of these issues, some school districts have revised their policies, carefully limiting the ways SROs and other law enforcement can interact with students. A popular model for reforms to limit the role of SROs is the School-Justice Partnership started in Clayton County, GA, where the juvenile court and the school district partnered to reduce the school-to-prison pipeline. This effort has yielded extremely low recidivism rates for juvenile offenders. The Clayton County School-Justice Partnership Replication Team now consults with schools around the country, helping them to develop their own partnerships. At the heart of these partnerships are two documents: a decision tree for school staff to determine when to involve police in student misconduct issues, and a memorandum of understanding between key stakeholders agreeing to abide by the decision tree. For information about other efforts to limit and define the role of SROs, see the resources listed in Appendix E.

**Strategy Three: Instituting Training and Hiring Best Practices**

When students walk into school, they bring the issues they face at home, past traumatic experiences, and a host of other factors that affect their day-to-day experience at school. Yet police departments and school districts often hire SROs ill-suited to deal with these issues and fail to provide them necessary training. A 2017 report found that Georgia public schools hired officers pushed out of prior policing jobs for issues such as sexual misconduct and inappropriate use of force at twice the rate of local police departments. As of 2017, only twelve states required training for SROs on how to interact with children, and less than a third of states required SROs to obtain any training specific to working with young people or in a school setting. Such trainings are particularly critical for police, whom child development experts contend have often received “warrior mentality” training that stands at odds with best practices for working with children.

Responding to these widespread issues, multiple organizations, including the National Association of School Resources Officers (NASRO), provide guidelines for hiring individuals fit to be successful SROs. The central tenets common to such guides are summarized in the box on the following page.
Best hiring practices include:

1. **Applying to be an SRO must be voluntary.** Some police departments assign officers who lack enthusiasm and experience working with youth to these positions. Only officers who understand the role of an SRO and desire to work in the unique school environment should be permitted to serve as an SRO.

2. **SROs should reflect the populations they serve.** Many interviewees expressed that SROs with similar backgrounds to students more easily build rapport with students and are more effective because students place more respect and trust in these SROs. Diversity hiring initiatives are critical to ensure the demographics and life experiences of SROs mirror those of the students.

3. **Candidates must have stellar records.** No officer with a history of excessive use of force may be hired as an SRO. School districts must be permitted to conduct independent background checks of any candidates.

4. **School administrators ultimately decide.** Although SROs are often funded and led by a local police department, it is critical that school administrators be able to veto any candidate based on lack of fit for the role.

In addition to hiring the right people, school districts must commit to providing additional training for SROs. As with hiring, many advocacy organizations have identified the most important training topics for SROs, including but not limited to crisis intervention and de-escalation, cultural competency, developmental psychology, implicit bias, Positive Behavior Intervention and Supports (PBIS), restorative justice, disability awareness, and trauma-informed practices. This report highlights just one of these training topics: restorative justice.

Restorative justice refers to a set of practices centering on mediation, community-building and agreement over punishment. Rather than administering suspension, expulsion, or other punitive practices, restorative justice seeks to address conflict through harm circles, mediation, family group sessions, and other measures aiming to restore the harm inflicted upon the community. Restorative practices bring together perpetrators, victims, and other community members to talk, process, and air grievances in order to solve problems and prevent reoccurring issues, while avoiding overly punitive and often
highly discriminatory disciplinary action. Training SROs in restorative justice not only provides schools with a restorative justice facilitator, but helps SROs build deeper and more positive connections with students.

The Oakland Unified School District (OUSD) offers a model for successful implementation of restorative justice. By removing suspension for minor behavioral issues and instead relying on restorative practices, the district has reduced school pushout while maintaining a safe environment for students. Prior to implementing restorative justice, Black and Latinx students were eight times more likely to be suspended than white students. One year after implementation, the number of Black students being suspended in OUSD decreased by 29 percent. Furthermore, 90 percent of teachers surveyed felt that implementing restorative practices helped with managing difficult behaviors.

By implementing proactive and rehabilitative approaches and concurrently ending suspensions for behaviors such as willful defiance and disruption, schools can better equip students to resolve conflict while lowering suspension and expulsion rates. Students benefit from having relationships with individuals who care and are committed to their well-being. More than just following a superficial policy change or attending a single training series, individual stakeholders must have a deep commitment to promoting a positive and just school culture. Ultimately, care-oriented training and hiring methods can transform the school into a space where children can learn how to manage their behaviors and be embraced with understanding and mercy rather than harsh disciplinary policies perpetuating a dangerous cycle of punishment.

**Steps to Implementation**

**Stakeholders**

Cities interested in rethinking the use of SROs should ideally convene a multi-agency task force with strong and diverse community representation. The task force should include but not be limited to representatives of the following stakeholders: school counselors, social workers, students, teachers, administrators, the police department, the district attorney’s office, juvenile court, and community-based advocacy groups.
Program Development

1. Gather Data
The task force should begin by seeking input from the school district about daily security in and around the school, protocols for emergency situations, and any other use of law enforcement or security, such as large events and DARE programming. It is also critical to determine the funding structure for SROs and how much flexibility there may be to shift these funds elsewhere. Other important information to gather from school districts include disciplinary procedures, suspension and expulsion rates, graduation rates, the number of school policy violations per year, and the number of arrests over time.

Cities should then survey students, parents, and teachers on their interactions with and feelings about SROs. A draft of the survey questions should be made public before the final survey is released in order to gather community feedback on the methodology and wording. Past surveys conducted by school districts have included questions asking respondents to rate how much they agree with statements about SROs and school safety. Such questions should seek to determine, among other things, whether respondents feel more or less safe with SROs; their perception of school climate; and what services or personnel they believe are underfunded. Open-ended survey questions and focus groups are also useful to identify unknown impacts of SROs on student wellness. Such qualitative methods also help readers of the survey results evaluate it through an equity lens, which means putting more weight on the perspectives of marginalized students.

2. Evaluate Data and Solutions
The next step is to publicize the data in its entirety. The survey results should be broken down data by race, gender, socioeconomic status, and disability. Often, school boards also summarize the data at an open meeting and allow community members to comment on the results. From here, cities should engage in a series of open listening sessions with the community both on the results of the survey and the community’s reflections on student safety more broadly.

3. Create and Implement Safety Plan
After the taskforce has decided and the school board has voted on how to move forward with school police, the real work begins. The taskforce should create a series of documents including, but not limited to, an explanation of how the new safety plan will comply with state school safety requirements; specific details on how any new initiatives will be funded; a memorandum of understanding between the school district and police
force; a decision tree for school administrators to determine when to contact police; and a handbook of student’s rights.

The task force should then oversee the progress of any new hiring, training, or programming. The task force should continue to meet at least quarterly to discuss whether the plan is being implemented correctly. It is also important to continue to survey students and other stakeholders on their perceptions of school safety. Equally important, the task force should urge school districts to track and publish annual data on student misconduct, recidivism, arrests, and disciplinary actions.

**Funding**

For many school districts, terminating their SRO programs will free up hundreds of thousands or even millions of funds for much-needed support staff, including counselors, nurses, psychologists, and social workers. In New York City, for example, redistributing the city’s estimated $451 million of school policing spending could add $280,000 to every school’s budget.\(^{237}\) But when SROs are funded through a local police department, terminating an SRO program may not immediately free up additional funds for the school district.

Even when a school district cannot be able to hire new personnel, it can still institute policy and programming changes to increase school safety. The documents linked in Appendix E contain information about hiring and training practices, many of which are free or inexpensive. Additionally, organizations such as the School-Justice Partnership provide free or low-cost consulting on revising school policies and partnerships with police departments.
Conclusion

Current policing tactics in the fields of homelessness, mental health, traffic enforcement, and school safety too often lead to harmful - and sometimes deadly - interactions between police and civilians. As the country emerges from the COVID-19 pandemic in the coming months, cities have an exceptional opportunity to capitalize on the national appetite for reform in policing and public safety. The proposals we recommend in this report - such as adopting permissive ordinances for homelessness, sending crisis counselors instead of police to mental health emergencies, creating self-policing streets with civilian enforcers, and implementing restorative justice practices in schools - can help local jurisdictions address public health concerns efficiently and free up valuable law enforcement resources. These strategies also limit unnecessary interactions between police and civilians, helping to keep vulnerable people from getting ensnared within the broader criminal justice system. Federal proposals for broad police reform, from the CAHOOTs Act to the Biden plan for investment in Community Policing, offer potential funding sources for local reforms in the coming months. Single-party control of Congress and the Presidency may promote rapid changes to the availability of federal support in the next two years. We urge every locality to seize this moment to reevaluate its relationship with its law enforcement agencies and to consider the goals and layout of its public safety infrastructure.
Appendix A:

Select City Models for Mental Health Crisis Response

<table>
<thead>
<tr>
<th>Name: CAHOOTS</th>
<th>Location: Eugene, OR</th>
<th>Status: Operating since 1989</th>
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<tbody>
<tr>
<td>Population: 172,000</td>
<td>Budget: ~$2.1 million annually (2020)</td>
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<tr>
<td>Program Hours: 24 hours a day, seven days a week</td>
<td>Personnel: 40 team members, three vans</td>
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</tr>
<tr>
<td>Stakeholders: White Bird Clinic, Eugene Police Department, Springfield Police Department</td>
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<td></td>
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<tr>
<td>Funding Sources:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• City Budget – The City has supported CAHOOTS through the Eugene Police department budget</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• County Budget – When CAHOOTS expanded into Springfield in 2015, it received a grant from Oregon Health and Human services which was administered by Lane County</td>
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<td></td>
</tr>
<tr>
<td>• Donations – White Bird Clinic receives a small amount of donations that help run CAHOOTS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dispatch Process: CAHOOTS is dispatched on EPD’s service channel and calls are triaged through the Central Lane Communication Center. In Springfield, this is done by SPD’s calltakers. Some of the CAHOOTS calls are a joint response, or CAHOOTS is summoned to a police or fire call after it is determined their services are a better match to resolve the situation.</td>
<td></td>
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<tr>
<td>Savings: On average, $8.5m annually in public safety costs, $6m in medical service costs, and $14m in ambulance trips and emergency room costs</td>
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<table>
<thead>
<tr>
<th>Name: CRU</th>
<th>Location: Olympia, WA</th>
<th>Status: Operating since 2019</th>
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<tbody>
<tr>
<td>Population: 52,000</td>
<td>Budget: ~$550,000 (2020)</td>
<td></td>
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<tr>
<td>Program Hours: 7 A.M. to 9 P.M., seven days a week</td>
<td>Personnel: Six team members, and four substitutes</td>
<td></td>
</tr>
<tr>
<td>Stakeholders: Recovery Innovations International, Olympia Police Department (OPD)</td>
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<td></td>
</tr>
</tbody>
</table>
Funding Sources:

- **Voter-Passed Levy** – Olympia voters passed a public safety levy in 2017. The levy did support other programs, but specifically allocated funds for the police department to contract with a behavioral health partner to staff Crisis Response Units (CRU) as an alternative to police response.

- **Grant Funding** – OPD received a grant from the Washington Association of Sheriffs and Police Chiefs (WASPC) to fund Familiar Faces, CRU’s adjacent peer navigator program, and renewed its grant in early 2020 to expand the program.

**Dispatch Process:** CRU teams use police radios to identify and respond to calls that might otherwise go to police. Thurston County Communications Center identifies all potentially CRU-eligible calls over the shared police frequency, and CRU may decide to respond, or officers may refer calls to CRU. CRU can also provide a secondary response at the request of officers.

**Savings:** There is not enough currently enough data to estimate annual savings, however, CRU’s cost per response is less than half of OPD’s cost per response, suggesting significant savings.

<table>
<thead>
<tr>
<th>Name: STAR</th>
<th>Location: Denver, CO</th>
<th>Status: Established in 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population: 620,000</td>
<td>Budget: ~$208,000 (2020)</td>
<td></td>
</tr>
<tr>
<td>Program Hours: 10 A.M. to 6 P.M., Monday through Friday</td>
<td>Personnel: One van with two civilians, a clinician and a paramedic (rotating)</td>
<td></td>
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<tr>
<td>Stakeholders: Mental Health Center of Denver, Denver Health, Caring for Denver Foundation, Denver Justice Project, Denver Police Department</td>
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</tbody>
</table>

**Funding Sources:**

- **Grant Funding** – grant from "Caring for Denver", a nonprofit founded in 2018 after the passage of ballot initiative to levy a sales tax and address mental health and substance abuse.

- **Medicaid Funding** – STAR is able to bill Medicaid for most of the calls they respond to, and therefore only bill the city for a little more than a third of their calls.

**Dispatch Process:** The STAR van is dispatched in response to 911 calls coming into Denver's 911 communications center and calls from Denver's non-emergency line. Dispatchers have undergone training to understand what calls are appropriate for the team and what questions to ask. The STAR team does not wear uniforms or carry weapons and their van is unmarked.

**Savings:** There is not enough currently enough data to estimate annual savings.
<table>
<thead>
<tr>
<th>Name: MACRO</th>
<th>Location: Oakland, CA</th>
<th>Status: Implementation in 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population: 430,000</td>
<td><strong>Budget:</strong> $1.35 million (Allotted in 2020)</td>
<td></td>
</tr>
<tr>
<td><strong>Program Hours:</strong> 24 hours a day, seven days a week</td>
<td><strong>Personnel:</strong> Two vans, each with a mental health professional and EMT, and a program coordinator</td>
<td></td>
</tr>
<tr>
<td><strong>Stakeholders:</strong> Coalition for Police Accountability, Urban Strategies Council, Oakland Police Department, Oakland Fire Department, OPD Dispatch, and the Mayor's Office</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Funding Sources:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• <strong>Police Budget</strong> - Part of the $12 million ($1.35 million) in immediate reductions and transfers of funds out of Oakland Police Department (3 percent of annual budget) is being used to fund MACRO</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Dispatch Process:</strong> MACRO proposes that the incoming service requests from emergency and non-emergency lines be routed to MACRO dispatch to determine feasibility for behavioral health intervention. Then, if the call is not mental health-related, the call will be routed through the current Oakland Police Department procedures. If the call is mental health-related, a MACRO service provider will engage with the subject and potentially refer to services.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Savings:</strong> Program has not begun operations yet.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Appendix B:
Select City Models for Outreach Programs for Unhoused Individuals

<table>
<thead>
<tr>
<th>Name: Homeless Multidisciplinary Street Team (HMST)</th>
<th>Location: Santa Monica, CA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel: Seven members, including program coordinators, clinicians, case managers, and advocates</td>
<td>Budget: $600,000 (2016/2017)</td>
</tr>
</tbody>
</table>

**Funding Sources:**

- **HUD Funding** – The County distributes Continuum of Care vouchers which are funded by the Department of Housing and Urban Development. These vouchers support linking rental assistance with other services for unhoused individuals.

- **Local Funding** – The City of Santa Monica has supported HMST, most recently allocating $1.2 million in funding in 2019 to support the program for two years. Additionally, Los Angeles County programs administered by the Department of Mental Health and the Department of Health Services support HMST.

- **Medicare/Medicaid** – For those individuals who need additional care (e.g., convalescent homes/assisted living), HMST can bill those services to Medicare/Medicaid.

**Description:** The Homeless Multidisciplinary Street Team (HMST) focuses on a small population of chronically homeless individuals who use services at a higher rate, and links them to service providers that will assist them on a path to get off the streets and into permanent housing. In addition, HMST will link individuals to mainstream services (medical treatment, mental health care, substance abuse treatment, etc.), and engage in legal advocacy to ensure individuals stay off of the streets.

**Savings:** Individuals had fewer interactions with police officers, firefighters and emergency room doctors after HMST began working with them. While the cost of HMST is about $48,000 annually per client, the lower demand for expensive city services offset between 17 percent and 43 percent of the cost to fund the team.

<table>
<thead>
<tr>
<th>Name: Project 25</th>
<th>Location: San Diego, CA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel: N/A</td>
<td>Budget: $1.5 million (2011-2014)</td>
</tr>
</tbody>
</table>
### Funding Sources:
- **Grant funding** – United Way of San Diego provided a grant, to be used over three years, to fund the City’s pilot program.

### Description:  
Project 25 identified the 25 highest-cost users of emergency medical services in the county and immediately placed them in permanent supportive housing. The pilot eventually grew to 35 participants. The program followed the “housing first” model, which says a stable living environment is the necessary first step to helping someone deal with issues like addiction, chronic disease and mental illness.

Everyone in Project 25 was given an apartment, covered by a HUD voucher, and services either through county mental health or St. Vincent de Paul, a nonprofit homelessness-services provider.

### Savings:  
In 2013, Project 25 participants took 600 fewer ambulance rides, were in the ER 1,100 fewer times and spent nearly 1,000 fewer days in the hospital compared with the year before they entered the program. All this resulted in a savings of more than $2 million. None of the original Project 25 participants have returned to the street.

<table>
<thead>
<tr>
<th>Name: Street Medicine and Shelter Health Team</th>
<th>Location: San Francisco, CA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Personnel:</strong> 50-60 team members, half are licensed clinicians, half are unlicensed professionals who provide support</td>
<td><strong>Budget:</strong> $6 million (2018)</td>
</tr>
</tbody>
</table>

### Funding Sources:
- **City/County funding** – In 2018, the City/County of San Francisco announce a $6 million investment to expand the initial pilot program which connected nearly 100 individuals who were unhoused and dealing with substance abuse to buprenorphine, a treatment for opioid abuse.
- **State funding** – In 2019, the State granted the City/County $3 million to expand mental health and substance abuse services. Some provisions of the grant directly fund the expansion of the Street Medicine and Shelter Health Team, while other provisions fund related programs.

### Description:  
San Francisco’s street medicine is a multidisciplinary team that works on providing comprehensive transitional primary care for those experiencing homelessness. The team brings doctors and other health professionals directly to people living on the streets to hear their stories and earn their trust. Sites include parks, encampment health fairs, hospitals and needle exchange sites. Staff provide as many services as the person will accept, from food to medication, including addiction treatment. Staff also help transition people living on the streets into shelter and housing.

### Savings:  
The model “saves taxpayer money, considering the thousands of dollars it can cost to go to the emergency room — the de facto doctor’s office for most chronically ill homeless people. By comparison, the average visit to the clinic costs at most a few hundred dollars in public money.”
<table>
<thead>
<tr>
<th>Name: Camp Hope</th>
<th>Location: Las Cruces, NM</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Personnel:</strong> One full-time program coordinator to connect individuals at the Camp with services</td>
<td><strong>Budget:</strong> $15,000, mostly for tents</td>
</tr>
</tbody>
</table>

**Funding Sources:**

- **Federal Funding** – MVCH used a 10-month Shelter Plus Care Grant to fund Camp Hope and its other services. The Shelter Plus Care Program provides rental assistance in connection with matching supportive services. That funding pays primarily for the operational funding/staff of the Camp.

- **Fundraising/Donations** – MVCH hosts an annual fundraiser (tentstorents.org), which asks people to raise money for 6 weeks out of the year via the online platform. These funds are used to pay for utilities and maintenance costs for the tents and the bathroom that has been installed.

**Description:** Camp Hope is a self-governing transitional living community that provides temporary, transitional shelter in the form of tents, showers, and cooking facilities. Currently about 50 homeless persons reside at Camp Hope. Residents range in age from 25 to 65. Although residents live in Camp Hope from several weeks to several months, the goal is to enable them to transition to permanent housing as quickly as possible. Camp Hope’s location on the Mesilla Valley Community of Hope (MVCH) campus enables its residents to have ready access to the many services that MVCH provides, including mail service, assistance and referrals to social service agencies, case management, and assistance in obtaining needed identification documents.

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2. Christie Thompson, This City Stopped Sending Police to Every 911 Call, MARSHALL PROJECT (July 24, 2020), https://www.themarshallproject.org/2020/07/24/crisisresponders.
3. Zoom Interview with Chris Richardson, Associate Director of Criminal Justice Services, Mental Health Center of Denver (Nov. 6, 2020).
4. Zoom Interview with Anne Janks, Director, Coal. for Police Accountability (Oct. 13, 2020).
5. Zoom Interview with Zack Coil, Program Director, The People Concern, and Brian Hardgrave, Senior Administrative Analyst on Homelessness, City of Santa Monica (Nov. 12, 2020).
8. Zoom Interview with Nicole Martinez, Executive Director, Mesilla Valley Cnty. Hope (Nov. 16, 2020).
Appendix C: Legal Rights of Unhoused People

In 2018, the United States Court of Appeals for the Ninth Circuit, with the previous support of the Obama Administration, held in Martin v. City of Boise that a city cannot impose criminal sanctions against unhoused individuals sleeping outdoors on public property when there is not an alternative form of shelter made available to them. Despite the pleas of many municipal governments, the U.S. Supreme Court refused to overturn the Ninth Circuit’s ruling. The Ninth Circuit’s ruling is just one of many in recent years that have expanded the legal rights of unhoused people. According to the National Law Center on Homelessness & Poverty, “[m]ost recent cases have upheld the legal rights of homeless persons to perform various life-sustaining behaviors in public places. Since 2014, favorable results were obtained in state and federal court: 75 percent of cases challenging evictions of homeless encampments and/or seizure and destruction of homeless persons’ belongings; 57 percent of cases challenging enforcement of camping and/or sleeping restrictions; 100 percent of cases challenging laws restricting begging and solicitation.” These recent expansions of the legal rights of unhoused people can be categorized into three areas and have arisen alongside a broader legislative movement to affirm the rights of the unhoused.

Eighth Amendment Challenges to Camping or Sleeping Prohibitions

These cases build on the Supreme Court’s holding in 1962 in Robinson v. California that it is cruel and unusual punishment, and therefore unconstitutional, to criminalize “status” crimes, defined by who people are rather than what specific actions they take. Under this logic, criminalizing a homeless person’s mere right to exist is unconstitutional. The above-discussed Martin v. City of Boise decision by the Ninth Circuit was decided on these grounds. Similarly, in 2016, the United States District Court for the Northern District of California held that the city of Eureka, CA, could not enforce an anti-camping ordinance until the city provided shelter and property storage facilities for the unhoused. Several other federal and state courts have made similar determinations that jurisdictions cannot criminalize sleeping outdoors on public property without offering meaningful alternatives.
Fourth and Fourteenth Amendment Challenges to Eviction of Unhoused Persons from Encampments

These cases provide constitutional protection for unhoused individuals' possessions against the destruction of their property by police or other government employees without adequate notice and due process. In one 2016 settlement, before the United States District Court for the Central District of California, the City of Pomona was forced to recognize the impropriety of police officers confiscating and withholding items and documents from unhoused individuals.245 Similarly, a federal court ordered the City of Los Angeles to stop seizing items on the street without evidence that such items were abandoned, an immediate threat to public health, evidence of a crime, or contraband. The Los Angeles City Council settled the case by agreeing to alter police anti-homeless tactics in various areas of the city.246

First Amendment Challenges to Restrictions on Begging or Solicitation

These cases follow the U.S. Supreme Court’s ruling in 2015 in Reed v. Town of Gilbert that any restrictions imposed by jurisdictions limiting signage were to be reviewed by courts under strict scrutiny, the highest level of judicial scrutiny.247 Under this standard, municipalities cannot treat different information on signs as subjected to different standards. Therefore, advocates for homeless rights have argued, a town cannot ban individuals from holding signs or physically soliciting donations if other similar actions would be permitted by non-unhoused individuals, such as charity workers or businesses. Courts have generally agreed. The United States Court of Appeals for the Seventh Circuit struck down a Springfield, IL restriction of vocal pleas by those seeking cash donations because the law limited only certain types of speech.248 Federal and state courts in various states have reached similar conclusions regarding the unconstitutionality of limitations on speech targeted towards the unhoused.249

Homeless Bills of Rights

Rhode Island, Connecticut, and Illinois have all passed statutory “homeless bills of rights” in the past decade that explicitly protect the rights of the unhoused.250 These three states’ legislation centers on the equal protection guarantees of the federal constitution and their state laws. All residents of a state must be treated equally by the
law, government agencies, and the courts, even if they do not possess a permanent address.

With Rhode Island’s law as a model, these statutes generally protect the right to move freely in public spaces; the right to receive equal treatment by state and municipal authorities; the right to be free from discrimination while seeking or maintaining employment; the right to receive emergency medical care; the right to vote, register to vote, and receive documentation necessary for voter registration; the right to be protected from disclosure of information or records conveyed to a temporary residence such as a shelter; and the right to have a reasonable expectation of privacy regarding personal property.\(^{251}\)

These protections already exist in most, if not all, states’ codes. But, the power of a bill of rights specifically for the unhoused, whether passed by a state legislature or a local jurisdiction, is that such legislation makes clear that these rights cannot be infringed for any person. Regardless of housing situation, all members of a community must be recognized as such.

**Liability**

Although some critics of the mobile crisis team model have referenced liability issues, all currently implemented programs have responded to calls without the result of injury to their personnel or those being serviced. In addition to the proven minimal risk associated with this type of program, any liability for those responders (certified and non-certified) injured at work rests on the shoulders of the stakeholder organizations running the operation. Since both non-certified and certified responders are likely to be considered employees,\(^{252}\) they will be able to collect workers’ compensation for these injuries, as well as retain the right to file a lawsuit against a third party if the responsible party is someone other than his or her employer. Therefore, cities can, but may not need to, indemnify themselves of any liability for injuries caused to responders or those serviced.

If a certified paramedic or EMT responder causes an injury to someone they are servicing at work, that injured party can file a lawsuit against the EMT or private employer (the stakeholder organizations of the mobile crisis team). But the injured party must meet the high standard of proving gross negligence and breach of duty of care by providing improper treatment, or willfully failing to provide emergency care to the victim. If a non-certified responder causes injury at work, the injured party can file a
lawsuit against the EMT or private employer, but only if the medical assistant is found to have exceeded the scope of practice, and by doing so, has incompetently or negligently caused the patient injury. The scope of practice for a medical assistant is determined by the state.

For these practical and legal reasons, liability has not proven to be an issue for current mobile crisis response teams throughout the country.

**Data and Privacy**

To effectively establish and operate affirmative outreach programs, cities will likely need to establish legal channels for sharing information on service provision with stakeholders involved in the program. If the locality is pursuing a model that requires program employees to share unhoused clients’ health information with other stakeholders, the City must be aware of its responsibilities under the Health Insurance Portability and Accountability Act (HIPAA) to share minimum necessary information. Typically, the best way to establish an effective data sharing approach is to engage the City attorney and partners in a conversation to establish such procedures and then document the procedures in a standard MOU.
Appendix D: Fee and Fine Harms and Alternative Enforcement Models

The harms of excessive criminal justice fines and fees on low-income communities has been well documented. California offers a prime example of how traffic fees and fines can spiral out of control. Fees and fines for low level infractions grew as a palatable alternative to raising taxes for revenue generation following the 2008 financial crisis. When people couldn’t afford to pay the skyrocketing price of tickets, the state resorted to drastic measures: assessing exorbitant late fees, requiring full payment before allowing the person to appear before a judge to contest the tickets, and suspending licenses for unpaid debt, requiring full payment of all outstanding fines before the license could be reinstated.253

While this may have increased revenue when applied to people who could afford to pay the additional fines, it failed miserably when applied to those who couldn’t. The United States is a particularly car-dependent society, and access to jobs, education, and basic services are often predicated on access to a reliable form of transportation.254 People who had their licenses suspended for failure to pay debts faced an impossible choice: stop driving and lose access to opportunities to pay off those debts through work, or keep driving and risk losing what might be your most valuable asset – your car. Driving on a suspended license was a misdemeanor that meant police could tow your car to an impound lot for 30 days if you were caught. For low-income drivers, the exorbitant tow fees could prevent you from ever retrieving your car.255 Moreover, the disproportionate shouldering of fees and fines by low-income residents means that cities and states only collect around 10 to 20 percent of the fees they assess.256 California finally repealed the practice of suspending driver’s licenses for unpaid debts in 2017.257

Requiring officers or civilian agents to issue only warnings for certain offenses could substantially reduce the impact of over-policing on minority communities without affecting safety.258 Police officers are already accustomed to exercising substantial discretion when it comes to policing traffic offenses, with some studies finding that only 30 to 50 percent of traffic stops result in a ticket or summons.259 Some studies suggest that minority drivers are generally more likely to receive a ticket or summons in a traffic stop than white drivers, while others indicate that Black drivers may be stopped at higher rates but with a slightly lower likelihood of receiving a ticket from the encounter.260 When the Oakland Police Department focused their attention on offenses that presented a clear danger, the absolute number of stops of black resident dropped by nearly half.261 Black residents were still stopped at nearly 10 times the rate of white residents, but an absolute
drop in the number of stops constitutes a dramatic improvement. Even when the initial assessment of whether or not to issue a ticket with a fine is not tinged with racial bias, the downstream costs of a traffic ticket disproportionately harm those who can’t afford to pay, and can generate further interaction with police officers and the criminal justice system for minority drivers.\textsuperscript{262} Standardizing the use of verbal and written warning citations in lieu of tickets with fines presents an effective, low-cost opportunity improve the perceived legitimacy of police traffic stops\textsuperscript{263} while also improving long term outcomes for low income and minority residents.

Cities should also consider alternatives to payment. Some standard options include payment plans and some limited forgiveness or amnesty for unpaid fines. Some cities and states also offer community service options, such as SF Project 20.\textsuperscript{264} Project 20 is administered by a non-profit group and allows individuals to perform community service in conjunction with city workers to pay off their fines. Michigan recently passed a law requiring all tickets to notify drivers that they have the option of engaging in community service instead of paying their fines.\textsuperscript{265}
Appendix E:

Resource Guides

The following documents are a sampling of the many plans that non-profit organizations have created to guide schools on removing school police and/or reducing the school-to-prison pipeline:

ADVANCEMENT PROJECT & ALLIANCE FOR EDUCATIONAL JUSTICE, WE CAME TO LEARN: A CALL TO ACTION FOR POLICE-FREE SCHOOLS, https://advancementproject.org/wecametolearn/


DIGNITY IN SCHOOLS, A RESOURCE GUIDE ON COUNSELORS NOT COPS: SUPPLEMENTAL MATERIALS FOR DSC POLICY RECOMMENDATIONS ON ENDING THE REGULAR PRESENCE OF LAW ENFORCEMENT IN SCHOOLS (2016).


Endnotes


7 Belinda Luscombe, She Wrote a Book about Bias. Here’s How She Thinks Police Departments Should Approach Reform, TIME (June 8, 2020), https://time.com/5849172/police-racial-bias/.


9 Saleh et al., supra note 6, at 114.


11 Henry J. Steadman et al., Prevalence of Serious Illness Among Jail Inmates, 60 PSYCH. SERV. 761, 764 (June 2009).


13 Saleh et al., supra note 6.


15 See Appendix A.


20 Id.

21 Id.

22 Zoom Interview with Tim Black, Director of Consulting, CAHOOTS (Nov. 3, 2020).

23 Id.

24 Id.

25 Id.


28 Christie Thompson, This City Stopped Sending Police to Every 911 Call, MARSHALL PROJECT (July 24, 2020), https://www.themarshallproject.org/2020/07/24/crisisresponders.


35 Interview with Tim Black, supra note 22.

36 Id.

37 Zoom Interview with Chris Richardson, Associate Director of Criminal Justice Services, Mental Health Ctr. of Denver (Nov. 6, 2020).


39 Interview with Tim Black, supra note 22; Zoom Interview with Anne Janks, Director, Coal. for Police Accountability (Oct. 13, 2020).

40 Id.

41 Other programs hire licensed clinicians in these roles (e.g., Denver STAR). In Colorado, licensed clinicians can initiate an involuntary mental health hold for a client in need without calling for police backup (Interview with Chris Richardson, supra note 37). While this could be a helpful option in some jurisdictions, we feel that the therapeutic benefits and cost savings of hiring a diverse group of non-clinicians outweigh this concern.
At CAHOOTS, for instance, all staff complete over 500 hours of training. See Media Guide, White Bird Clinic, supra note 27.

For example, when CAHOOTS started, they had a small staff running from Tuesday - Saturday, 4 P.M. - 12 A.M., Interview with Tim Black, supra note 22.


Partnerships can be jurisdiction sharing agreements—where two or more jurisdictions share resources to create a CAHOOTS-style program, or “split”/formally divided agreements, where despite the fact that the responder team is shared, the staff members employed are split between two jurisdictions.

Media Guide, White Bird Clinic, supra note 27.

STAR time-on-scene is 25 minutes, when the average police response is 38 minutes. Interview with Chris Richardson, supra note 37.

If the teams are part of a local coordinated care organization (CCOs), they may be eligible to receive Medicaid funds. White Bird Clinic, which implements CAHOOTS, for example, gets a substantial portion of its funding through Medicaid. Interview with Tim Black, supra note 22. The Centers for Medicare and Medicaid Services (CMS) have recently allowed local Medicaid providers to transform their care into wrap-around services (per member per month) while receiving funding for those services. Considering these wraparound services, including screening, intervention and referral to treatment, can be considered as addressing the social determinants of health. In the past, if local CCOs have integrated their funding and delivery systems, and agreed to reduce the growth of the cost of healthcare spending, CMS has supported and incentivized these programs. See Eric Parsons et al., Coordinated Care Organizations Implementation Proposal, OREGON HEALTH POLICY BOARD (Jan. 24, 2012). See also K. John McConnell, Oregon’s Medicaid Coordinated Care Organizations, 315 JAMA 869-70 (Mar. 1, 2016).

Senator Ron Wyden (D-OR) & Representative Peter DeFazio (D-OR) introduced identical versions of the CAHOOTS Act in the Senate and the House (S.4441 and H.R. 7961, respectively) during the 116th Congress. Crisis Assistance Helping Out On The Streets Act, S.4441, 116th Cong. (2020).

CAHOOTS is funded in part by private donors, and they generally try to get dollars that are not earmarked for specific purposes in order to have flexibility. See interview with Tim Black, supra note 22.


Id. at 21.

Id. at 8.

Id. at 9.

Researchers at Portland State University evaluated the impact of the Portland, OR Police Bureau’s Service Coordination Team (SCT) in reducing crime among program participants and lowering criminal justice costs. The SCT is a comprehensive homeless reduction initiative that targets the most difficult cases, involving chronically homeless individuals who have also had frequent contacts with the police. The 2018 evaluation found a 75% reduction in post-program arrests. Donald Trapp et al., Study of The Service Coordination Team and its Influence on Chronic Offenders, 7 (2018). Researchers calculated that every dollar spent on the SCT program resulted in a $13.10 savings in costs related to crime and criminal justice system activities. Id. at 38. In Pinellas County, Florida, the sheriff’s office opened the Safe Harbor facility as an alternative to jail for approximately 450 individuals involved in low-level crimes often related to homelessness. The facility, which offers both temporary housing and wrap-around support services, costs about $2.3 million per year to operate. That is about half of what it would cost to house those same 450 individuals in the county jail, where they wouldn’t have the access to services they receive in Safe Harbor. Eileen Zaffiro-Kean, Volusia Leaders Taking Hard Look at Pinellas Homeless Shelter, DAYTONA BEACH NEWSJ. (June 7, 2015), https://www.newsjournalonline.com/article/LK/20150607/News/605058270/DN.

See Appendix C.
83 Id.
84 Pierson et al., supra note 6.
86 Id. (noting that while 8% of white drivers receive no reason for the stop from the executing officer, almost 18% of Black drivers receive no reason).
87 Id.
88 Id. supra note 6, at 46.
89 Beth A. Colgan, Beyond Graduation: Economic Sanctions and Structural Reform, 69 DUKE L.J. 1529, 1552-53 (2020) (“[R]esearchers have linked increased traffic ticketing to both budgetary shortfalls and statutory limitations on other mechanisms for generating revenue such as property tax caps.”); Thomas A. Garrett & Gary A. Wagner, Red Ink in the Rearview Mirror: Local Fiscal Conditions and the Issuance of Traffic Tickets, 52 J. L. & ECON. 71, 71 (2009) (finding that “tickets are used as a revenue-generation tool rather than solely a means to increase public safety”).
90 See Wesley G. Skogan et al., On the Beat: Police and Community Solving Problems 51 (2020) (“[T]he success of traffic enforcement is usually measured by the number of traffic tickets written.”); Glenn French, How Ticket Quotas Negatively Impact Police Morale and Public Trust, POLICE (Nov. 21, 2016), https://www.police1.com/police-products/traffic-enforcement/articles/how-ticket-quotas-negatively-impact-police-morale-and-public-trustSwHcZgpm1lQhi1B/ (“Too often leadership simply places a number on an officer’s monthly performance and requires a certain number of violations to meet the minimum performance goal.”); Garrett & Wagner, supra note 89, at 74 (“There is evidence that some jurisdictions have linked police performance and pay to the number of tickets that officers issue.”); George Joseph, NYPD Commander’s Text Messages Show How the Quota System Persists, APPEAL (Dec. 12, 2018), https://theappeal.org/nypd-commanders-text-messages-show-how-the-quota-system-persists/.


99 Woods, supra note 6, at 18-19.


102 Ryan Fosseca, *Do We Need Police to Curb LA’s Traffic Violence? Some Cities Are Saving Lives Without Them*, LAIST (Nov. 11, 2020), https://laist.com/how-to-new-la/reinvent/trafficsafety-los-angeles-police-roles-reexamined-vision-zero.php (noting that DOT improvements to a Brooklyn street, including a protected bike lane, were followed by a 50% reduction in speeding and a 63% reduction in injury crashes).


105 Conner, supra note 101, at 996.

106 Id. at 997


108 Id. at 15.


115 Boudin, supra note 97.

116 Leah Shahum, *Acting for Racial Justice & Just Mobility*, VISION ZERO NETWORK (June 8, 2020), https://visionzeronetwork.org/acting-for-racial-justice-just-mobility/ (committing to “replac[ing] traditional enforcement roles and strategies in Vision Zero Network guidance with strategies that uphold our belief that truly safe design and infrastructure, coupled with policies and processes that are anti-racist, won’t require enforcement; and encourag[ing] individual Vision Zero communities to do so too.”).

117 Conner, supra note 101, at 979.


In fact, automated traffic enforcement technologies are so effective at generating revenue that communities may be wary of adopting these technologies despite the clear safety benefits. The National Highway Traffic Safety Administration (NHTSA) recommends a combination of transparency on the part of administrators and express focus on the safety benefits to counter skepticism about the goals of automated traffic enforcement. David Randall Peterman, *Safety Impact of Speed and Red Light Cameras R46552*, Cong. Rsch. Serv. 15 (Sept. 28, 2020).


Zackory T. Burns & Sachiko V. Donley, *Social Evaluative Mechanisms: A Potential Psychological Mechanism Coloring Police-Public Encounters*, 8 U.C. Irvine L. Rev. 1, 3 (2018) (identifying “racial bias, stereotype threat, and racial anxiety” as “among the most highly cited” “psychological mechanisms that contribute to racially biased policing and increased racial violence”);

Devon W. Carbado, *From Stopping Black People to Killing Black People: The Fourth Amendment Pathways to Police Violence*, 105 Cal. L. Rev. 125, 151-52 (2017) (describing an officer’s “decision. . . to use the traffic violation as a pretext” as one of many decisions that “reveal[s] the discretion police officers have to practice racial profiling in ways that heighten black vulnerability to police surveillance and violence”).

Asher & Horwitz, supra note 14.

Engel, supra note 78, at 450 (summarizing prior studies).

Woods, supra note 6, at 4950.


Woods, supra note 6, at 49.

O’Connor, supra note 128.


O’Connor, supra note 128.


John S. Dempsey, Linda S. Forst, & Steven B. Carter, *An Introduction to Policing* 290 (9th ed. 2019) (“[T]raffic stops are one of the primary tasks of patrol officers . . .”); id. at 86 (“Nonsworn (civilian) members of police departments are not given traditional police powers and can exercise only the very limited arrest power given to ordinary citizens.”); Ross Wolf & Thomas Bryer, *Applying an Outcomes-Based Categorisation to Non-Warranted/NonSworn Volunteers in United States Policing* 93 Police J. 1, 42, 44, 46-47 (2020) (comparing traffic monitors to volunteer police who do not have enforcement power).

The following are states that currently prohibit use of speed cameras: Maine, Mississippi, New Hampshire, New Jersey, and South Carolina. Ins. Inst. for Highway Safety, supra note 136.


Conner, supra note 101, at 976 n. 36.

Seattle Dep’t, Transp., Speed Limit Case Studies 3 (2020).


N.Y.C. Dep’t. Transp., supra note 107, at 7.


Id.

Glazer supra note 119.

Fonseca, supra note 102.

Seth Benkle, Chapter 26: Transportation Officers Authorized to Combat Bandit Taxicabs, 40 MCGEOGE L. REV. 587 (2009).

Id. at 588.


Hedgpeth, supra note 144.

Id.


See Katie Reilly, ‘Police Do Not Belong in Our Schools’: Students Are Demanding an End to Campus Cops After the Death of George Floyd, TIME (June 5, 2020), https://time.com/5848959/school-contracts-


140 Joseph M. McKenna et al., The Roles of School-Based Law Enforcement Officers and How These Roles Are Established: A Qualitative Study, 27 CRIM. JUST. POL’Y REV. 420, 421 (2016).


142 Id. at 621.

143 Id.; Emily G. Owens, Testing the School-to-Prison Pipeline, 36 J. POL’Y ANALYSIS & MGMT. 11, 14 (2017).


149 Id.


157 Id.


159 Id. at 90849.

160 Id. at 930.

161 Educ. Res. All. for New Orleans, Technical Appendix: Voices of New Orleans Youth: What Do the City’s Young People Think About Their Schools and Communities, at 37 n.4 (2020) (finding that 58% of
students surveyed in New Orleans charter schools feel safer in the presence of school police officers; Jonathan Nakamoto, Rebeca Cerna & Alexis Stern, High School Students’ Perceptions of Police Vary by Student Race and Ethnicity: Findings from an Analysis of the California Healthy Kids Survey, 2017/2018, WESTED 3-5 (finding most high school students surveyed in California believed the statement “I feel safer with the officer at school” is at least a little true); Audry Breen, Survey: Most VA High Schoolers Agree SROs Make Them Feel Safer, Some Disagree, U. VA. SCHL. EDUC. & HUMAN DEVELOP. (July 13, 2020), https://education.virginia.edu/news/survey-most-va-high-schoolers-agreesros-make-them-feel-safer-some-disagree (finding the majority of students of all races in Virginia high schools agreed SROs made them feel safer at school).

182 See, e.g., Nakamoto et al., supra note 181, at 4-5 (demonstrating that 27% of black students in California felt the statement “I feel safer with the officer at school” is not at all true, compared with 15% of white students); Breen, supra note 181 (finding 32.5% of black students disagreed the SROs make them feel safer at school, compared to 25% of white students).

183 See, e.g., Nat’l Assoc. of Sch. Res. Officers, To Protect & Educate: The School Resource Officer and Prevention of Violence in Schools, 26 (2012), https://www.nasro.org/clientuploads/About-Mission/NASRO-To-Protecand-Educate-nosecurity.pdf (noting SROs improve students’ perception of law enforcement in general); Nakamoto et al., supra note 181, at 4 (finding “students of color had more positive perceptions of school-based law enforcement than they had of police in their community”).


185 Aaron Kupchik et al., Police Ambassadors: Student-Police Interactions in School and Legal Socialization, 54 LAW & SOC’Y REV. 391, 408 (2020) [hereinafter Kupchik, Police Ambassadors].

186 Id. at 409.

187 See, e.g., Curran et al., supra note 30.


192 Bill Hutchinson, More Than 30,000 Children Under Age 10 Have Been Arrested in the US Since 2013: FBI, ABC NEWS (Oct. 1, 2019), https://abcnews.go.com/US/30000-children-under-age-10-arrested-us-2013-fbi/story?id=65798787#:%3A:text=with%20news%20about,More%3Dthan%3D2030%20children%20under%20age%2010%20have%20been%20arrested,were%20arrested%20in%20the%20US.&text=And%20the%20numbers%20skyrocket%20for,span%2C%20according%20to%20data.

193 See Nance, supra note 165, at 927; Amanda Petteruti, Education Under Arrest: The Case Against Police in Schools, JUST. POL’Y INST. 13 (2011); Owens, supra note 163, at 14.

194 Nance, supra note 165, at 922.

195 Id. at 955.

Mark Keierleber, ‘The Students Were the Danger’: In Racially Diverse Schools, Police Were More Likely to View Students as Threats, Study Shows, THE 74 (June 16, 2020), https://www.the74million.org/the-students-were-the-danger-in-racially-diverse-schools-polices-were-more-likely-to-view-students-as-threats-study-shows/ (citing Benjamin W. Fisher et al., Protecting the Flock or Policing the Sheep? Differences in School Resource Officers’ Perceptions of Threats by School Racial Composition, SOC. PROBS. (Oct. 2020)).

Id.


Id.; see also Educ. Rsc. Ctr., School Policing: Results of a National Survey of School Resource Officers, at 13 (2018) (reporting that one third of SROs surveyed said their school does not specify what types of disciplinary issues they can intervene in).


Na & Gottfredson, supra note 161, at 622-23, 640.

Id. at 621.

See Kittredge, supra note 158 (providing a non-exclusive map of school districts that have voted to remove SROs as of Dec. 15, 2020); Stephen Sawchuk, More School Districts Sever Ties with Police. Will Others Follow?, EDUCATIONWEEK (June 26, 2020), https://www.edweek.org/leadership/moreschool-districtssever-ties-with-police-will-others-follow/2020/06 (listing a few of the major cities that have voted to remove SROs).


Belsha, supra note 208.

Id.


214 Community Roadmap to Bring Healing-Centered Schools to the Bronx, supra note 213, at 75-76.


216 George Floyd Resolution, supra note 215.


218 See generally George Floyd District Safety Plan, supra note 56.

219 Id. at 27-28.


221 See, e.g., ACLU, *Cops and No Counselors*, supra note 166, at 4 (“Schools that employ more school-based mental health providers see improved attendance rates, lower rates of suspension and other disciplinary incidents, expulsion, improved academic achievement and career preparation, and improved graduation rates.”).


223 Nance, supra note 165, at 12, 29-50; Colin Slay, *Clayton County’s JDAI Journey, CLAYTON COUNTY JUV. CT. 3* (noting “school-related misdemeanor filings have fallen by more 90%” since the project began).

224 The SchoolJustice Partnership has guided dozens of school districts in creating community agreements to reduce the school-to-prison pipeline. For more information, contact Judge Steven Teske at Steve.Teske@claytoncountyga.gov or visit https://schooljusticepartnership.org.

Jeff Ernsthause & Brad Schrade, Troubled Cops Land Jobs in Georgia Schools, AJC (June 1, 2017), https://www.ajc.com/news/local-education/troubled-cops-land-jobs-georgia-schools/2p1SpVzIRp0ZKPg0ujrlFL/.


Kupchik, Police Ambassadors, supra note 185, at 392.


See Appendix E for NASRO’s best practices, as well as several model safety plans containing best practices.

The documents linked in Appendix E contain more information on these trainings.


Id. at 45.

Id. at 39.


In 2015, while the case was in the United States District Court for the District of Idaho, the Department of Justice filed a statement of interest supporting the plaintiffs’ argument that the Ninth Circuit’s previous prohibition of the criminalization of life-sustaining activities in public by homeless people applied to the question in Martin. Statement of Interest of the United States, Janet F. Bell, et al., v. City of Boise, et al., No. 1:09-cv-540REB (D. Idaho, Aug. 6, 2015).

“An ordinance violates the Eighth Amendment insofar as it imposes criminal sanctions against homeless individuals for sleeping outdoors, on public property, when no alternative shelter is available to them.” Martin v. City of Boise, 920 F.3d 584, 604 (9th Cir. 2019).

Various amicus curiae briefs can be viewed at: https://www.scotusblog.com/case-files/cases/city-of-boise-idaho-martin/.


For a full list of federal and state cases through 2018 examining such Eighth Amendment protections for the unhoused, see Bauman et al., supra note 241, at 21-46.

Allen v. City of Pomona, No. 16-cv-01859 (C.D. Cal. filed Mar. 18, 2016).


Norton v. City of Springfield, 768 F.3d 713 (7th Cir. 2014); Norton v. City of Springfield, 806 F.3d 411 (7th Cir. 2015).

For a full list of federal and state cases through 2018 examining such First Amendment protections for panhandling and solicitation, see Bauman et al., supra note 241, at 52-67.


Id. at 409-10.
Paul Smith, Andrea Frey & Ben Durie, *California Assembly Bill 5 and Health Care Workers*, HLB (Nov. 21, 2019), http://www.healthlaw.com/newsroom-advisories230.html; see also Dynamex Operations W. v. Superior Court, 4 Cal. 5th 903, 957, 416 P.3d 1, 35 (2018), ref’g denied (June 20, 2018), finding that “it is appropriate, and most consistent with the history and purpose of the suffer or permit to work standard in California’s wage orders, to interpret that standard as: (1) placing the burden on the hiring entity to establish that the worker is an independent contractor who was not intended to be included within the wage order’s coverage; and (2) requiring the hiring entity, in order to meet this burden, to establish each of the three factors embodied in the ABC test—namely (A) that the worker is free from the control and direction of the hiring entity in connection with the performance of the work, both under the contract for the performance of the work and in fact; and (B) that the worker performs work that is outside the usual course of the hiring entity’s business; and (C) that the worker is customarily engaged in an independently established trade, occupation, or business of the same nature as the work performed.”; see also AB5, which also adopts the “ABC” test that has been used by courts and government agencies to determine employee status. While AB 5 has exemptions for physicians, dentists, podiatrists and psychologists, it currently does not provide any exemption for nurse practitioners, nurse anesthetists, pharmacists, occupational/physical/speech/respiratory therapists, medical technicians or physician’s assistants—many of whom serve as independent contractors of hospitals or medical staffs. AB 5 expands the Dynamex approach to cover not just the existing wage orders, but also the California Unemployment Insurance Code (which provides for unemployment and disability benefits) as well as provisions of the Labor Code. The effect is that a person providing labor or services for remuneration must now be considered an employee rather than an independent contractor unless the hiring entity can demonstrate all three prongs of the ABC test.


Farida Jhabvala Romero, *Driving With Suspended License Top Crime in Menlo Park, Many Lose Cars*, PENINSULA PRESS (June 17, 2015), http://peninsulapress.com/2015/06/17/driving-suspendedlicense-topcrime-in-menlo-park-california/ (also noting that older, cheaper cars are more likely to come to the attention of officers due to mechanical failures, like a broken taillight).

Anne Kim, *When Cities Rely on Fines and Fees, Everybody Loses*, GOVERNING (Sept. 2018), https://www.governing.com/archive/gov-court-fees-fines-debt.html (noting that California had 12.3 billion in uncollected court debt as of 2016, and collection rates of under 10% in Alabama); Teresa Mathew, *The Only Winners in California’s Fines and Fees System Are Private Debt Collectors*, APPEAL (Jul 2, 2018), https://thecapital.org/california-fines-and-fees-system-private-debt-collectors/ (noting that San Francisco was only able to collect roughly 17% of $15 million in assessed fees over the course of six years, and that private debt collection agencies took commissions of 12 to 18%). Even tow companies started losing money, as low-income drivers couldn’t afford to pay fines to retrieve their cars, and the cars failed to fetch enough at auction to recover the storage rates. Romero, supra note 255.


259 Illya Lichtenberg, Police Discretion and Traffic Enforcement: A Government of Men, 50 CLEV. ST. L. REV. 425, 438-39 (2002) (citing various studies finding tickets or summons issued in only 30-50% of traffic stops nationwide and noting that “research on the exercise of discretion in issuing citations does not support the view that most traffic summonses are based on public safety criteria.”); see also id. at 442-50 (reviewing the “factors unrelated to the motorists’ conduct” that typically influence police discretion as to whether or not to issue a ticket, including quotas, demographic details, and the relationship of the motorist (if any) to the police and other local authorities).


263 U.S. Dep’t Just., Bureau Just. Stat., Police Behavior During Traffic and Street Stops, 2011 7 (Sept. 2013) (finding that 93% of drivers who were issued a warning following a traffic stop believed the police had behaved properly during the stop and noting the correlation between perceptions of the legitimacy of a traffic stop with the outcome of the stop).

264 SFMTA, SFMTA Citation Work Credit/Payment Plan Program: “Project 20” Terms and Conditions (July 1, 2013), https://www.sfmta.com/sites/default/files/reportsanddocuments/2018/01/project_20_fact_sheet_final_eff_07_01_2013_0.pdf.