



Final Report on Policy Feedback Process

July 2024



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I. INTRODUCTION & PURPOSE OF THE REPORT

Transparency in policing requires community input to shape the contours of acceptable community policing. To effectuate this, modern police policy manuals devote significant attention to addressing circumstances that involve direct interaction between police officers and community members. To this end, Dr. Branville G. Bard, Jr., Vice President for Public Safety and Chief of Police for the Johns Hopkins Police Department (“JHPD”), has emphasized that “the JHPD cannot function effectively without community input.”¹ To accomplish this objective, the JHPD followed a policy development process that included publicly posting draft policies and soliciting the Johns Hopkins community, including the broader Baltimore community, to review and offer input and feedback on the policies before their finalization.

This report describes the policy development process, summarizes the sharing and socialization of the draft policy manual, provides an overview of the public feedback, and synthesizes the major themes of the community's input and feedback.² The report concludes with recommendations for the JHPD’s leadership and officers. Since the public feedback period ended, the JHPD policy development team has worked to incorporate, adopt, or otherwise reflect the feedback provided. These revisions are documented in the Community Feedback on the Johns Hopkins Police Department Draft Policies—*Disposition Report* and are reflected in the finalized, approved, and publicly posted JHPD policies.

The growing complexity of policing, the necessity of providing the public with constitutional, fair, transparent, and accountable policing, and the requirement to provide police personnel with specific, clear performance expectations demand that a law enforcement agency maintain a policy manual that methodically guides officers in their work.³ Professional police agencies understand that policy direction must be comprehensive and anticipate the full breadth of circumstances police officers encounter during the scope of their service. In short, “a policy manual is the foundation for all of the police department’s operations.”⁴ The influence and importance of a professional policy manual for a law enforcement agency cannot be overstated. Indeed, academic research demonstrates that police agency policies significantly impact officer behavior.⁵

¹ PowerPoint Slide from the Policy Development Forum, April 27, 2023.

² The later sections of this report contain examples of feedback provided by the community. All original public comments are available on the JHU Public Safety website as part of the *Community Feedback on the Johns Hopkins Police Department Draft Policies - Disposition Report*, available at: <https://publicsafety.jhu.edu/community-safety/jhpd/jhpd-policies/>

³ Walker, Samuel, and Charles M. Katz. *The police in America: An Introduction*. 10th ed., McGraw-Hill, 2022.

⁴ Dr. Branville Bard, Vice President for Public Safety and Police Chief at Johns Hopkins University, Policy Development and Feedback Forum, April 27, 2023.

⁵ Fyfe, James J. “Administrative interventions on police shooting discretion: An empirical examination.” *Journal of Criminal Justice* 7.4 (1979): 309-323; Homant, Robert J., and Daniel B. Kennedy. “The effect of high-speed pursuit policies on officers’ tendency to pursue.” *Am. J. Police* 13 (1994): 91; Jennings, Jay T., and Meghan E. Rubado. “Preventing the use of deadly force: The relationship between police agency policies and rates of officer-involved gun

In the past, police agencies often presented themselves as rigid, law and order representatives of the government. Police agencies operating with a one-size-fits-all mentality – often leading to over-policing, intrusive and even unconstitutional practices, and unfair outcomes – tended to provide officers with incomplete, minimalistic policies and written guidance.

In contrast, professional 21st-century policing advances the mutually inclusive tenets of upholding the law while simultaneously treating community members fairly and equitably. Achieving this enhanced modern architecture requires a more sophisticated approach to policing. For one, policy manuals must provide direction to officers to effectuate the overarching mission of community safety furnished in the least intrusive manner to the communities served. In this regard, modern police policy manuals direct agency members to conduct their operations in a manner that overcomes historical practices, holds individual officers as well as their agency accountable to its stated values, supports the wellbeing of officers, demonstrates transparency in its operations, and delivers excellent police service to all community members.

deaths.” *Public Administration Review* 77.2 (2017): 217-226; Shjarback, John A., Michael D. White, and Stephen A. Bishopp. “Can police shootings be reduced by requiring officers to document when they point firearms at citizens?” *Injury prevention* 27.6 (2021): 508-513; Terrill, William, and Eugene A. Paoline III. “Police use of less lethal force: Does administrative policy matter?” *Justice Quarterly* 34.2 (2017): 193-216; White, Michael D. “Controlling police decisions to use deadly force: Reexamining the importance of administrative policy.” *Crime & delinquency* 47.1 (2001): 131-151.

II. SUMMARY OF THE POLICY DEVELOPMENT AND REVIEW PROCESS

A. Internal Policy Development

JHPD leadership established a multi-stage policy development process to ensure the final policy manual was customized to meet the needs and uphold the values of the Johns Hopkins (“JH”) community, which encompasses both the University and the Health System. Dr. Bard publicly described this process in a virtual forum on April 27, 2023, and it is briefly summarized here.⁶

In brief, JHPD leadership assembled a policy writing team of professional staff members with considerable experience in policing and policy writing (the “JH Policy Writing Team”) and who received training on inclusion, exclusion, and creating inclusive policies from the JHU Office of Diversity and Inclusion. The starting point for the drafted policies was conformity with the United States Constitution, the laws and regulations of the State of Maryland, the provisions of the *Community Safety and Strengthening Act (“CSSA”)*, and Maryland Police Reform legislation enacted beginning in 2021. The JH Policy Writing Team additionally collected source materials from a broad array of organizations, including the ACLU’s *Racially Just Policing Model Policies for Colleges and Universities*, the Justice Collaboratory at Yale Law School, President Obama’s Commission on 21st Century Policing, the City of Baltimore Consent Decree, the Leadership Council on Civil and Human Rights, the International Association of Chiefs of Police and the Police Executive Research Forum. The JH Policy Writing Team likewise collected sample and model policies from forward-looking municipal police agencies with a focus on those subject to, and reformed by, consent decrees,⁷ local and national peer university police agencies,⁸ the Maryland Police Standards and Training Commission, and the Commission on Accreditation for Law Enforcement Agencies.

The JHPD policies drafted by the JH Policy Writing Team were reviewed by an external consulting team from 21CP Solutions (“21CP⁹”) that included former law enforcement personnel, academics,

⁶ The recorded April 27, 2023 virtual forum and presented slides may be viewed at: <https://publicsafety.jhu.edu/updates-and-events/virtual-events/>.

⁷ The sampled policies include those of the Baltimore Police Department, the Detroit Police Department, the Ferguson Police Department, the New Orleans Police Department, the Portland Police Department, and the Seattle Police Department.

⁸ The sampled policies include those of Carnegie Mellon University, Morgan State University, Towson University, the University of Chicago, the University of Cincinnati, the University of Maryland, the University of Pennsylvania, and Yale University.

⁹ 21CP is a collective of national experts, from veteran police chiefs and preeminent scholars to leading civil rights lawyers and rank-and-file police representatives- all united behind a common goal of furthering a new, shared vision of public safety that can work for everyone. 21CP Solutions helps cities, communities, universities, and other organizations effectively tackle the challenges of delivering safe, effective, justice, and constitutional public safety services in the 21st Century. 21CP empower communities across the country to develop and implement equitable integrity-driven public safety- grounded in building trust and strengthening relationships. Public Safety Solutions for the 21st Century. Available at: <https://www.21cpsolutions.com/>

civil rights lawyers, and community leaders dedicated to advancing safe, fair, equitable, and inclusive public safety solutions. 21CP provided feedback and suggestions, which the JH Policy Writing Team considered and incorporated. Afterward, senior JH leadership reviewed the draft policies and recommended changes that the JH Policy Writing Team incorporated.

As a newly established police department, the JHPD had the unique opportunity to craft new policies that comprehensively address all operational needs. The overall intent behind the internal policy development process aimed to create policies that showcased the wisdom of the preeminent experts in the field of modern policing, reflected Johns Hopkins' commitment to excellence before the next vital step in the process, and included public feedback from both the JH and broader Baltimore communities.

B. External Policy Review

Before the public release of the draft policies, the JH Policy Writing Team shared the draft policies with the Johns Hopkins University Police Accountability Board (“JHAB”) pursuant to JHAB’s statutory mandate to “[p]rovide feedback on existing police department policies and practices, including police department standards for hiring and recruitment; and [s]uggest ideas for improving police department policies, procedures, and performance, including ideas for community-based public safety initiatives.”¹⁰ In preparation for its role advising the JHPD on policy content, the JHAB requested that 21CP suggest best practices for policy review. In response, 21CP provided a memorandum to the JHAB on August 9, 2023, that included recommendations for the JHAB to consider as its members established a transparent, collaborative, and representative policy review process. The JHAB discussed the recommendations contained in 21CP’s memorandum during its August 16, 2023 meeting, and 21CP’s recommendations assisted the JHAB in establishing procedures for its Policy Review Committee, which was established by JHAB, to review all draft JHPD policies.¹¹

The JH Policy Writing Team completed the internal drafting and development process, and the draft policy manual was posted on JH’s website for public review and feedback.¹² The volume of policy material that emanated from the internal process—89 policies and over 1,400 total pages—was extensive. Consequently, the release of policies was divided into two distinct groups.

¹⁰ Community Safety and Strengthening Act (2019), Section 24-1205(B), available at: https://mgaleg.maryland.gov/2019RS/chapters_noln/Ch_25_sb0793E.pdf.

¹¹ JHAB August 16, 2023 Meeting Minutes, available at: https://publicsafety.jhu.edu/assets/uploads/sites/9/2023/09/2023-08-16-JHAB-Meeting-Minutes_final-draft.pdf. Similarly informative are the meeting agendas and transcripts from the October 18, 2023, the November 15, 2023, and the January 17, 2024 JHAB Policy Review Committee meetings, available at: <https://publicsafety.jhu.edu/community-safety/jhpd/jh-accountability-board/meetings/>.

¹² See *id.*

The first tranche of policies, published on September 21, 2023, consisted of 47 generally operational policies relevant to the national conversation in policing surrounding the governance of police interactions with the public.¹³ Following the public release of the first tranche, a 90-day public review and comment period concluded on December 20, 2023.¹⁴

The second tranche, published on November 30, 2023, consisted of the 42 remaining policies. While important in their own right, the second tranche was distinguishable from the first in that the general focus of *most* of these policies relates more to administrative matters than to interactions with the public in the field.¹⁵ Following the public release of the second tranche, a 60-day public review and comment period concluded on January 29, 2024.¹⁶

Members of the public and the JHAB were not expected to become experts in policing, policing policy, or policing procedure to review and provide meaningful feedback on the draft policies. Indeed, both the JHAB and the public provided significantly valuable input throughout the public review process based on their diverse individual perspectives, including but not limited to gender identity, race, age, work, and life experience, and as members of the Johns Hopkins and Baltimore communities, who the proposed policies and practices may impact.

To help readers understand the draft policies more seamlessly, the JH Policy Writing Team prepared a brief cover sheet accompanying all 89 policies that provided an overview of each policy. Additionally, the JHPD hosted two virtual “Ask the Expert” sessions during which Dr. Bard and a recognized policing expert discussed selected policies in greater detail.¹⁷ These sessions, entitled “University Policing, Policy, and Getting it Right,” addressed questions received throughout the policy review process from the university's internal and external stakeholders.¹⁸

Both “Ask the Expert” sessions were posted on the Public Safety website, with the first released on November 28, 2023,¹⁹ and the second released on December 19, 2023.²⁰ The first session included a conversation between Dr. Bard and Dr. Robin Engel, a nationally respected criminologist and former Vice President of Safety and Reform at the University of Cincinnati (“UC”), who has spent more than two decades working in policing research designed to reduce harm in communities and make police-community encounters safer. The second “Ask the Expert” session included a conversation between Dr. Bard and James Whalen, a retired law enforcement official with more than 30 years of experience at the Cincinnati Police Department and the UC

¹³ See <https://publicsafety.jhu.edu/community-safety/jhpd/jhpd-policies/>

¹⁴ See *id.* The initial 60-day review period was extended by 30 days after requests from the community to be able to review all draft policies from both tranches simultaneously.

¹⁵ See <https://publicsafety.jhu.edu/community-safety/jhpd/jhpd-policies/>

¹⁶ See *id.*

¹⁷ See *id.*

¹⁸ See *id.*

¹⁹ See <https://youtu.be/HLuu0GMX9hs?feature=shared>.

²⁰ See <https://www.youtube.com/watch?feature=shared&v=5cn0LobENMo..>

Department of Public Safety, including in the development and implementation of reform measures at both agencies.

Topics addressed during the “Ask the Expert” sessions included:

- The policy development process;
- Agency accreditation;
- The JHPD procedural justice approach to interacting with the community;
- The importance of a strong foundation of policies reinforced by training, supervision, and accountability measures like the Public Safety Accountability Unit (the “PSAU”); and
- Specific policies related to:
 - Mission, vision, and values;
 - Use of force;
 - Training;
 - Employee performance and discipline;
 - Complaints and internal investigations;
 - Traffic enforcement;
 - Secondary employment; and
 - Clery Act reporting.

The public review and feedback period was further guided by the public disclosure of the following four-question framework developed by 21CP within which to consider the efficacy of the draft policies:

1. Is the policy consistent with community needs and values?
2. Does the policy help JHPD safely carry out its mission?
3. Is the policy understandable, or does it need clarification?
4. Is there anything not included that should be addressed in the policy?²¹

Importantly, JHU offered multiple ways for the public to provide feedback on the draft policies. For instance, the JHU website granted access to an online portal designated specifically for policy feedback. As mentioned above, the JH Policy Writing Team provided the draft policies to the JHAB and solicited its feedback. Moreover, in its function as the community's voice, the JHAB was also granted opportunities to share recommendations and suggestions from the community with JHPD leadership. Furthermore, Dr. Bard made himself personally available, meeting frequently with individuals and organizations, both internal and external to JHU, that were potentially impacted by the creation of the JHPD.

²¹ See <https://publicsafety.jhu.edu/community-safety/jhpd/jhpd-policies/>

All told, JHU endeavored during the public review and feedback period to remain faithful to one of the commitments highlighted on the JHPD Public Feedback webpage, namely its pledge to “adopting, incorporating, or otherwise reflecting recommended changes and feedback in the final version of policies that are aligned with JH values and commitments, permissible within legal parameters, and supported by national best practices for community policing and public safety.”²²

²² *See id.*

III. OVERVIEW OF COMMUNITY FEEDBACK

This report summarizes the policy feedback process, which was designed to elicit specific community reactions and feedback regarding the JHPD draft policies. **Between September 21, 2023, and January 29, 2024, the JHU Department of Public Safety received 883 feedback comments regarding the 89 draft JHPD policies.**²³ If a submitter provided multiple points of feedback within their single submission or provided numerous submissions, each point of feedback was counted as a separate comment. For example, if a submitter sent a response to one policy with five points of feedback, whether actionable or not, all five comments were counted individually.

Many of the submissions addressed multiple policies or issues covered in several policies – therefore resulting, in some instances, in changes across multiple proposed JHPD policies. At the same time, other public feedback did not include specific, actionable recommendations tied to the draft policies – asking questions or commenting on the JHPD’s creation or future operations. Additionally, as this report addresses below, 105 feedback submissions, submitted as feedback to 23 draft policies, were identical in language. Since the conclusion of the public review period, the JHPD policy development team has worked to incorporate, adopt, or otherwise reflect the feedback provided in the now-final policies.

Table 1 summarizes the total number of public feedback comments disaggregated by affiliation type.

Table 1. Policy Feedback Comments by Affiliation

Affiliation	Total # of Comments
<i>JHU-Affiliated Individuals</i>	
Students (graduate, post-doc, undergraduate, and unspecified)	132
Faculty	133
Staff	77
JH Accountability Board Member	71
Alumni	56
<i>Non-JHU Affiliated Individuals</i>	396
<i>Other (not specified)</i>	18
Total	883

²³ 21CP did not directly receive any comments or submissions. 21CP relied on JHU to provide the submissions they received in compiling this report.

Table 2 summarizes the total number of comments by policy²⁴ and release date.²⁵ As shown in Table 2, JH received the most comments on the draft policies released in Tranche 1. Of the 89 draft policies, 18 received no public comments. The policy that received the most feedback was the *Vision, Mission, and Guiding Principles* (#101). The feedback portal was designed to collect input on individual policies. Therefore, it appears that many contributors who provided general feedback about JHPD rather than policy-specific recommendations tended to use the first listed policy to provide such feedback. Consequently, not all 165 comments related to recommendations for Policy #101. This same dynamic applied, to a lesser degree, to several other policies from Tranche 1, with earlier-appearing policies receiving generalized feedback.

The other draft policies that generated the most feedback during the public comment period were *Fair & Impartial Policing* (#106), *Complaints Against Police Personnel* (#350), *Rules of Conduct* (#103), *Recruitment & Selection* (#302), *Interactions with LGBTQ+ Individuals* (#107), and *Use of Force* (#402). This suggests that community feedback was particularly focused on policy issues related to fair and ethical officer behavior and decision-making, particularly during police interactions with the public, as well as organizational selection standards, investigations, discipline, and accountability.

The remainder of this report provides an overview of the comments received during the policy feedback process, with an emphasis on synthesizing common themes. The report provides partial or complete feedback submissions as examples of each theme. **The provided comments are not, nor are they intended to serve as, an exhaustive inventory of all comments related to that topic.** Instead, the excerpted feedback is included as particularly illustrative examples of the types of feedback received on the topic.

Any identifying information has been redacted, but the comments are otherwise unedited from what community members provided via website submission, email, or other means.²⁶ Corrections to spelling, grammar, or typing errors appear with [] around any corrections.

Participation in any community engagement process is self-selecting – with individuals with more pre-existing interest, time, and opportunity more likely to participate. Therefore, it is important to note from the outset that the comments provided by those who participated in the policy feedback process may or may not reflect the sentiments of the larger JHU campus community, health system, or neighboring Baltimore communities that did *not* submit feedback.

²⁴ Gaps in the policy numbers do not indicate a “missing” policy. A policy manual’s table of contents and accreditation standards require that agencies leave “placeholders” for policies that may be necessary later. All newly developed JHPD policies will follow the same period for public and JHAB review if or when they are created.

²⁵ Tranche 1 was released on September 21, 2023 and Tranche 2 was released on November 30, 2023.

²⁶ In some cases, lengthier comments are shortened to the most relevant excerpts pertaining to the theme being summarized. As noted previously, all original public comments are available on the JHU Public Safety website as part of the *Community Feedback on the Johns Hopkins Police Department Draft Policies - Disposition Report*, available at: <https://publicsafety.jhu.edu/community-safety/jhpd/jhpd-policies/>

Table 2. JHPD Policy Feedback by Individual Policy

Policy Number	Tranche 1 or 2	Policy Name	Comments received
Global	N/A		28
101	1	Vision, Mission, & Guiding Principles	165
102	1	Professional Ethics	9
103	1	Rules of Conduct	35
104	2	Personal Appearance	4
105	2	Personal Use of Social Media & Electronic Devices	1
106	1	Fair & Impartial Policing	39
107	1	Interactions with LGBTQ+ Individuals	55
109	1	Procedural Justice	11
110	1	Observation & Recording of Police Services	13
111	1	Duty to Intervene	13
201	2	Authority, Department Organization, & Command	8
202	1	Written Directive System	9
203	2	Forms Control	0
205	2	Accreditation Management	0
206	2	Fiscal Management	0
208	2	Uniforms & Equipment	4
209	2	Fleet Management	1
210	2	Records Management	5
221	2	Media Communications	1
222	2	Clery Act Compliance	1
230	2	Criminal Justice Information Systems	0
301	2	Personnel Management	4
302	1	Recruitment & Selection	47
303	1	Background Investigations	27
305	2	Training & Professional Development	2
306	2	Field Training & Evaluation Program	1
312	2	Awards	1
313	2	Secondary Employment	1
350	1	Complaints Against Police Personnel	67
351	2	Non-Punitive Corrective Action	1
352	1	Expedited Resolution of Minor Violations ²⁷	1
353	1	Disciplinary Matrix ²⁸	See #350
354	1	Civilian Review Board Complaint Procedures	4

²⁷ In draft form, this policy was called *Expedited Resolution of Minor Misconduct*. The updated policy title, adopted because of public feedback, is listed in Table 2.

²⁸ Policy 353 “Disciplinary Matrix” was combined with Policy 350 in the revision process after the public comment period; the total number of comments in #350 reflects feedback on both original policy drafts.

Policy Number	Tranche 1 or 2	Policy Name	Comments received
355	2	Early Intervention Program	0
401	1	De-Escalation	21
402	1	Use of Force	48
403	1	Authorized Defensive Weapons	24
404	1	Patrol Rifle	27
405	1	Conducted Energy Weapon ²⁹	3
406	1	Special Impact Weapon	1
407	1	Use of Force Reporting, Review, and Assessment	11
408	1	Performance Review Board	9
409	1	Field Interviews, Investigative Stops, & Pat-Downs	8
410	1	Foot Pursuits	6
411	1	Search & Seizure	2
412	1	Custody, Transport, & Processing	3
413	2	Diplomatic Immunity	1
414	1	Non-Citizen Interactions	7
415	1	Individuals with Behavioral Health Conditions	6
416	1	Behavioral Health Crisis Dispatch	2
417	1	Emergency Medical Examination & Assistance	0
418	2	Behavioral Threat Assessment	7
420	1	Domestic Violence, Stalking, & Harassment	19
421	2	Court Orders for Protection	5
422	2	Victim & Witness Assistance	8
423	1	Arrest Warrants, Attachments, & Criminal Process	2
424	1	Arrests & Alternatives to Arrest	2
425	1	Community Policing & Problem Solving	7
426	1	Interactions with Youth	6
427	2	Patrol Operations	2
429	2	Police Radio Communications	0
430	2	Animal Complaints	0
431	2	Administration of Nasal Naloxone	0
432	2	Automated External Defibrillators	1
433	1	Body-Worn Cameras	1
434	2	Language Access Services	4
435	2	Communicating with Hearing Impaired Persons	2
438	2	In-Car Camera System	0
439	2	Automated License Plate Reader	0

²⁹ In draft form, this policy was called *Conducted Electrical Weapon*. The updated policy title, adopted because of industry standards, is listed in Table 2.

Policy Number	Tranche 1 or 2	Policy Name	Comments received
440	1	Emergency Driving	0
441	1	Vehicle Pursuits	1
442	1	Traffic Control & Enforcement	6
443	2	Collision Investigations	0
444	2	Driving Impaired & Under the Influence	0
445	2	Assistance to Roadway Users	0
446	2	Vehicle Towing & Storage	0
447	2	Parking Enforcement	0
460	1	Criminal Investigations	6
461	1	Custodial Interrogation	2
462	1	Eyewitness Identification	2
463	1	Exculpatory & Incriminating Evidence	2
464	2	Missing Persons Investigations	2
465	1	Domestic Violence, Stalking & Harassment ³⁰	29
466	1	Hate & Bias Incident Investigations	2
467	2	Evidence Collection & Preservation	2
470	2	Field Reporting System	0
480	2	Critical Incident Response & Management ³¹	5
481	2	Active Assailant Response	3
486	1	Assemblies, Demonstrations, & Disruption of Campus Events ³²	11
Total			883

³⁰ In draft form, this policy was called *Response to Crimes of Sexual Violence*. The updated policy title, adopted to include responses to stalking and harassment, is listed in Table 2.

³¹ The full text of these policies is not publicly available, pursuant to MD Code, General Provisions, § 4-352, because the disclosure of JHPD's critical incident and emergency management training and procedures or JHPD's active assailant training and procedures could risk compromising the security of Johns Hopkins facilities, facilitate the planning of an active assailant or terrorist attack, and endanger the lives and physical safety of members of the Johns Hopkins and broader Baltimore communities, as well as JHPD members.

³² In draft form, this policy was called *Assemblies, Demonstrations & Disruption of Campus Activities*. The updated policy title, adopted because of public feedback, is listed in Table 2.

IV. COMMUNITY FEEDBACK ABOUT DRAFT JHPD POLICIES

This section synthesizes the major themes of community feedback received on the draft JHPD policies, whether that feedback was submitted as a question, comment, or specific recommendation for revising individual policies. This policy feedback is organized by themes identified by 21CP, but the report also provides the specific policy number under which the commenter originally submitted the feedback.

The categorization of comments within themes was determined by 21CP, not by the community members who submitted the original feedback. This determination was made after reviewing the substance of the feedback and identifying the most appropriate theme, regardless of the specific policy under which the comment was submitted.³³ Significant identified themes include Interactions with the Community, Fair & Impartial Policing, De-Escalation and Use of Force, Diversified Response, Jurisdiction, Recruitment and Selection, Officer Wellness, Accountability, and Transparency.

Again, **community comments in this report appear as submitted and are presented in the interest of a fair, objective summary of public feedback on the draft JHPD policies.** The report offers no response, one way or another, about the substance, applicability, or quality of underlying comments. Likewise, the presentation of comments or themes in this report does not communicate anything about the suitability or appropriateness of incorporating the comments into JHPD policy or making changes to draft policies to respond to those comments. **As such, the goal is to provide an overall inventory of the array of community concerns received.** The comments selected for inclusion in the report are intended to represent all points of view provided in the public feedback.

A. Interactions with the Community

The Johns Hopkins community comprises students, faculty, staff, visitors to the University and Health system, and neighbors not formally affiliated with the University who live and/or work in the Johns Hopkins campus area or who regularly interact with members of the JH community. As a result, the Johns Hopkins community encompasses people of diverse cultures, backgrounds, lived experiences, and interests who live and work within a large, urban area.

From the outset, Johns Hopkins and JHPD leadership have expressed a commitment to serving all members of the Johns Hopkins and Baltimore communities by fostering strong police-community relationships – and by partnering with the community to collaborate on preventing, deterring, addressing crime, and promoting community safety. It will be the responsibility and duty of all

³³ For further description of content analysis see: Krippendorff, Klaus, "Content analysis," *International encyclopedia of communication* 1.1 (1989): 403-407; Braun, Virginia and Victoria Clarke, "Using thematic analysis in psychology," *Qualitative research in psychology* 3.2 (2006): 77-101; Neuendorf, Kimberly A. "Content analysis and thematic analysis," *Advanced research methods for applied psychology*. Routledge, (2018) 211-223.

JHPD personnel to engage in community policing on an ongoing, day-to-day basis. As outlined in draft policies, JHPD expects all its members to adhere to and apply the principles of community policing in their daily interactions with the people they serve.

1. Policy 107 (Interactions with LGBTQ+ Individuals)³⁴

The feedback on JHPD personnel interactions with the community was considerable, particularly related to Policy 107, which addresses Interactions with LGBTQ+ Individuals. The excerpts below reflect just a sample of comments received regarding this policy.

- *LGBTQ+ is very common. Sometimes it is extended to LGBTQIA+. It is notable that the list of definitions includes what the “I” is usually used to refer to (intersex) but the “A” (asexual) does not appear anywhere. Otherwise, the list of terms at the start of this section is fairly comprehensive (although one could include Two Spirit as well). My biggest concern is that only one of the two that make up “IA” is listed and there is a reference to the shorter LGBT or GLBT but not the longer LGBTQIA. The list in the main paragraph of III.B includes what appears to be a mixture of nouns and verbs and should be copyedited carefully. Section IV.B is very well written using all modern standards on how to deal with names and pronouns.*
- *The term “cross-dresser” is given as a term to use instead of transvestite. It would be good to add that cross-dresser should not regularly be used when referring to transgender people. This could discount their transgenderedness and reinforce that they are not the gender that they identify with. It also can offend people if called a cross-dresser when they don't consider themselves as such. It would be safer not to use this term when talking to or describing people. It also reinforces gender stereotypes of clothing, which is not the most progressive view. As an example, a skirt is not “women’s clothing,” although many people in America might classify it as that. In many cultures men wear skirts and dresses as well. Anybody can wear a skirt. So, cross-dressing is an outdated term that is reinforcing the harmful gendering of things. Also, a more appropriate term used in lieu of homosexual would be same-sex couple rather than gay or lesbian if gay or lesbian has not been explicitly said by the people. This can widen the range of people included in the terminology and stop assumptions from being made because not every couple with two people of the same sex are gay or lesbian. Thanks for giving space for community feedback!*
- *“This requirement does not preclude members from investigating whether a person is giving false information to a police officer.” This will inevitably lead to transphobic investigations and police targeting transgender students as suspects of “giving false information,” especially when*

³⁴ Terminology in this area is evolving, sometimes quickly, and not everyone is equally familiar with terms or how they apply in a university context. The JHU Office of Diversity and Inclusion recommended that JHPD stay with LGBTQ+ to align with University and Medicine usage. For more information: <https://diversity.jhu.edu/assets/uploads/sites/11/2021/12/SecondJHURoadmap.pdf>

students already struggle to correct their name/gender marker in JHU's systems. This sentence should be removed...VI.B. –“When making decisions about transport and custody of a person, members shall deem an individual’s gender to be male or female based on the individual’s gender identity. As such, transgender and/or intersex persons shall be transported with other arrestees of the same gender identity, unless the individual expresses a safety concern or a member identifies a safety concern, in which case the person shall be transported alone. For a person who states that they are nonbinary, gender fluid or gender nonconforming, the member shall ask the person if they would be more comfortable being transported with males or females” What happens when the individual expresses safety concerns? Why don't you have a plan in place for what to do then? Will there be detainment areas for non-binary individuals and individuals who don't feel safe being placed with males or females? These kinds of areas absolutely need to be provided.

- *...Overall, I consider the draft to be appropriate and current to best practices for showing respect for LGBTQ+ people, especially transgender and other gender-variant people... While I’ve never been in favor of the private police, I understand it's a reality now, and appreciate that efforts are being made to govern police interactions with LGBTQ+ people. I offer these comments in hopes of improving the draft policy and its implementation. Small Edits:
1) The memo uses the term “transgendered persons” which is outdated and inaccurate. Please change to “transgender persons.”
2) In Definitions, definition for Cisnormativity states “...being cisgender is superior to all other genders.” More accurately, it should read “...to all other gender modalities.” Cisgender and transgender are not genders. Man, woman, nonbinary, etc., are genders. To capture this difference, the label “gender modality” is used to name the umbrella category in which cisgender and transgender are.
3) Definition for Gender Identity: it would serve to add a note that cisgender and transgender people alike have gender identities (similarly to how it states that all people have sexual orientations and gender expressions).
4) Definition for Transgender: the word “transexual” is used but is not also defined. Later, “transsexualism” is noted as a word to avoid, but again, transexual is skipped. Since some people use the term “transexual” to refer to themselves, but a growing proportion of trans people find it offensive, this should be addressed either in definitions or words to avoid. Police should not be using it the person themselves asked to be referred to that way. Defaulting to trans or transgender is much safer. (see pdf of full comments) In the definition for Cisnormativity, ‘cisgender’ is referred to as a gender. It is actually a category of gender identity, as is ‘transgender,’ and not a gender in itself. NIH possibly missed this in their definition as an oversight.*
- *X. Youth Ref. Section “:... shall not disclose a youth’s actual or perceived gender identity, gender expression, or sexual orientation to the youth’s parents or guardians without the youth’s consent ...” Why is this prohibition on disclosure solely to Parents/guardians? The disclosure should be prohibited, unless necessary, to all/any parties including JHU administration, witnesses, etc. b) Further, Disclosure of this private information – including sexual orientation – should not be*

automatic even when the individual concerned is 18 years or older. “Outing” is a concern for many young people of college age and can have many potential consequences. Any such [dis]closure, without consent, must be seriously weighed and only pursued when clearly necessary/required.

This section is extensive and does meet a need for informing/advising JHPD members of new/emerging terminology et al., regards LGBTQ+ individuals and community. Also, this extensive section on LGBTQ+ approaches does raise the question as to if some added section is also planned?

regarding interactions with other communities? IE: How best to address certain minority groups, etc. (Illegal Vs Undocumented, Hispanic Vs Latino/a Vs LatinX, Native Vs Indigenous Vs Indian, Black or Negro Vs Afro or African/American, etc. Some of this seems obvious to many, but may not be obvious to others depending on their background.

2. The Need for the JHPD to be Inclusive in its Interactions with the Community

Numerous community comments identified other policies that need to utilize appropriate terminology and be more inclusive to enable the JHPD to serve the needs of various diverse or marginalized communities more effectively – such as youth, people with disabilities or behavioral health concerns, and victims of sexual and domestic violence. These comments appear to reflect community members' desire for JHPD officers to carry themselves thoughtfully, respectfully, and in accordance with constitutional principles during their interactions with the public by placing themselves in the shoes of community members.

- Policy 414 – Non-Citizen Interactions:

414, pg. 1

Policy Statement

The Johns Hopkins Police Department (JHPD) recognizes that one of the University’s greatest strengths is its international diversity. The Johns Hopkins community includes many members who originate or permanently reside in countries outside of the United States. Understanding that some members of its community – including students, faculty, and staff – are non-citizens, Johns Hopkins recognizes and prioritizes the need to foster trust with non-citizens and their communities.

COMMENTS: Needs to acknowledge broader City community, not just JHU-affiliated non-citizens.

I wonder about taking out the word international. International visitors (here temporarily, have protection of other nations, new to local procedures & unlikely to learn them), foreign-born Baltimoreans (arrived last week or 40 years ago, a permanent part of the community, no protection from any other entity/gov't)

- Policy 420 – Domestic Violence:

Thorough in including the LAP and taking a trauma-informed lens. The policy is advised to include:

1) annual required training of PD provided by trained victim advocates

specifically House of Ruth Maryland, documented with training documentation accessible to the public (min 1-hr refresher training annually)

2) adopt a "universal education" approach about support services -- specifically, encourage survivors to seek support services (House of Ruth Maryland) even if assessed harm is low, using a universal education approach that simply raises awareness about available services and encourages their use

3) training section needs to include 1) strategies for survivor-centered, trauma-informed care to minimize harm, and 2) current national surveillance on the prevalence, severity and impact of domestic violence for college-age individuals (see CDC NISVS, and National Violence Death Reporting System).

4) make use of existing evidence-based strategies for onward support and referral, including www.myplan.org

5) draw on a wider set of recommended response materials including those developed for first-line violence support, specifically the WHO LIVES approach (Listen, Inquire, Validate, Enhance safety and Support), available at <https://www.who.int/publications/i/item/9789241517102>

6) include extensive internal expertise including the JHU SVAC (sexual assault advisory Committee) and GBV-related staff of Wellness to review and approve the training on an annual basis for key content and emergent new learning.

- Policy 465 – Response to Crimes of Sexual Violence:

In paragraph II.A on victim-centered response to crimes of sexual violence there is a list of characteristics that should not be determining factor in treating an individual with respect. Race/ethnicity is not on that list. There are number of other characteristics from the JHU diversity wheel that are not on the list. Perhaps a comprehensive list from the diversity wheel is unnecessary, but it would seem like race/ethnicity should be on that list. Perhaps age is also important as race. I realize that the paragraph ends with "or any other characteristic," making it unnecessary to list every last category, but it is not at all clear why characteristics like race and age are not considered sufficiently important to be listed explicitly.

- Policy 465 – Response to Crimes of Sexual Violence:

Thorough in taking a trauma-informed survivor-centered lens.

The policy is advised to include the following:

1) medical assistance section should specify that victims will be made aware of forensic evidence collection available through trained sexual assault nurse examiners, currently available at Mercy Hospital. All victims should be offered safe, free transport for forensic exam should they so choose, and should be offered the opportunity to talk with a trained victim advocate (non PD) prior to deciding about a forensic exam.

2) strike language related to "cooperate" in investigation and replace with "participate"

3) specify minimum annual required training of PD on sexual violence provided by trained sexual violence victim advocates, documented with training documentation accessible to the public (min 1-hr refresher training annually)

4) training section needs to include 1) strategies for survivor-centered, trauma-informed care to minimize harm, and 2) current national surveillance on the

prevalence, nature, severity and impact of sexual violence for college-age individuals (see CDC NISVS, and National Violence Death Reporting System).

- **Policy 465 – Response to Crimes of Sexual Violence:**
Good evening, I am writing to suggest a change to JHPD Directives #465, Response to Crimes of Sexual Violence, Section III, I. When obtaining an initial statement from the SA survivor, ensure the personnel mirror the same language as the victim. If the survivor describes their encounter as a “sexual assault” instead of “rape,” the personnel should not take ownership of the victim’s narrative by asking questions about the survivor’s emotions about their “rape,” but rather ask about their reaction to the “assault.” The survivor may also require time to process the traumatic experience and space to use different label.
- **Policy 426 – Interactions with Youth:**
Super detailed. I liked the different categorical levels of offenses along with respective treatment of the youth given the level of the offense.
 - *Cool: – Officers are reminded that interrogations of youth must always follow the special guidance for youth set forth in this Directive, regardless of the perceived maturity or comprehension of the youth.*
- **Policy 103 – Rules of Conduct:**
I did a cursory review and did not note any policies related to ADA compliance when police interact with individuals with disabilities. (ADA.Gov links also included).

3. Community Engagement

Several comments suggested that Policy 101 does not sufficiently acknowledge or reflect the historical and existing JHU-community at large tensions and fails to reflect a specific commitment by the JHPD to continue collaborating with those communities.

- **Policy 101 – Vision, Mission, & Guiding Principles:**
The “Justice” statement should be an acknowledgment of the issues that Johns Hopkins has had, even in recent history, with marginalized communities throughout Baltimore City. This statement as it is does not acknowledge the tensions between Johns Hopkins and the communities throughout the City, only government agencies and the marginalized communities. These should not be confused or intertwined.
- **Policy 101 – Vision, Mission, & Guiding Principles:**
While the current Vision and Mission statements emphasize the engagement of the community at the co-creation level, this does not extend to including community stakeholders in provision of security services, engagement of police in sensitization activities or routine planned reviews of the policies outlined with the community to ensure that JHPD is upholding its mission statement. Would request that the Mission and Vision more accurately reflect the ACLU document on Racially Just policing,

which states this very clearly, and emphasizes the need for continuous community engagement and minimal police involvement.

4. JHPD Personnel Appearance

One person touched on the need to demilitarize the JHPD's appearance.

- Policy 208 – Uniforms & Equipment:

Is there a reason visible name plates are not to be worn at all times? Visibility of a nameplate inspires confidence with the public that police are identifiable and are not hiding or obscuring their identity. Even if not practical at all times, this should be considered as a routine practice.

- VI. Body Armor: This section gives the impression that officers will always wear soft body armor or ballistic vest while on duty. If so, This potentially gives a militaristic impression to the public. Even if this is a practice in large city police departments, it really should be considered if this is the militaristic impression the JH campus police wish to present. And if there are not alternative ways to use ballistic vest when only fully necessary.

B. Fair & Impartial Policing

As submitted for community comment, JHPD's draft policies prohibit discriminatory policing and require that all JHPD members only take a law enforcement action when it conforms with the legal requirements of reasonable suspicion, probable cause, or relevant exigent circumstances and that any such action is supported by articulable facts. The draft policies prohibit the use, to any extent or degree, of any actual or perceived personal characteristics as the basis to conduct any law enforcement action unless it is conducted pursuant to a reliable, trustworthy, timely, and specific individual physical description that is linked to a distinct person.

Community feedback in this area tended to focus on a perceived need for more detailed directives on the factors that officers may or may not consider in contacting individuals and to ensure greater inclusivity in terms of policy language.

1. Policy 106 – Fair & Impartial Policing

- *There's no mention of "Whren" stops in the entire policy, which is an essential case in impartial policing concerning traffic stops. "Bias-Based Policing" needs to be changed to "Discriminatory Policing." Bias-based policing used to be known as racial profiling, but it covers biases that one would only know by **looking** at an individual. Discriminatory policing covers things that may be learned through further conversations, such as immigration status, language ability, and everything else currently listed under the JHPD definition of "Bias- Based Policing" in JHPD Policy #106.*

Why have the definitions for the policy not come from a legal dictionary or BPD Fair & Impartial Policing policy?

There is no mention of discriminatory policing outside of the cover memorandum for JHPD Policy#106. This is a huge issue since the Fourteenth Amendment to the United States Constitution, Article 24 of the Maryland Declaration of Rights, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., Title II of the Americans with Disabilities Act, 42 U.S.C. § 12131-12134, the Omnibus Crime Control and Safe Streets Act of 1968, 34 U.S.C. § 10101 et seq., and Md. Code Ann., Crim. Proc. § 4-101.1 strictly prohibits discriminatory policing. This citing is straight from BPD's Fair & Impartial Policing policy 317.

Constitutional policing needs to be in its own policy. At the core of everything that an officer does, constitutional policing should be guiding it. And if they were attempting to be better than or learn from the Baltimore Police Department Consent Decree, the biggest violation that the Department of Justice found was their failure to uphold Constitutional policing. It should not be a footnote buried in another policy.

- *Page 5 of the policy notes: "These personal characteristics can never be used as the sole basis for probable cause or reasonable articulable suspicion. Officers must be able to describe how the individualized physical and personal characteristics are specifically related to establishing RAS or probable cause when initiating enforcement based on such characteristics. "This guidance is not concrete enough – per ACLU recommendations, it is noted that it is often a combination of race and "perceived" suspicious activity that leads to racially motivated arrests. Include language that more closely mirrors ACLU recommendations, particularly the below steps for officers:*

Before an officer initiates an encounter with an individual, the officer should consider the following:

- a. Setting aside the individual's physical appearance, what specific behavior(s) is the individual exhibiting that rouse my suspicion?*
- b. Do those behaviors make me believe that this person poses a risk of violence or physical harm?*
- c. Who, specifically, would be physically harmed by this behavior? How?*

2. Policy 101 – Vision, Mission, & Guiding Principles

- *In the paragraph on justice there are two types of marginalized communities (people of color and LGBTQ+) listed. I realize it would be impossible to include every marginalized community and the sentence does conclude with "and others," but is this a situation where simply saying "and marginalized communities" or "all types of marginalized communities" and leave it without examples.*
- *In the paragraphs on diversity and equity there are interesting focal points. For the diversity, it appears to focus on making sure of a diverse workforce, whereas for equity, that focuses on fair and equitable services. But I don't see anywhere that the*

“dots are connected” talking about fair and equitable services to the diverse community.

3. Policy 409 – Field Interviews, Investigative Stops & Pat-Downs

- *I appreciate the opportunity to offer constructive feedback on the preliminary version of Policy 409: Field Interviews, Investigative Stops & Pat-Downs. I commend the Johns Hopkins Police Department for its proactive efforts in promoting transparency, accountability, and fostering collaborative relationships with the community. Policy 409 plays a vital role in defining the framework for interactions between law enforcement officers, the community, and safeguarding the rights of community members. In an effort to enhance clarity and precision within the policy, I have outlined suggested revisions below, accompanied by the rationale behind each proposed change.*

Voluntary Contact

1. Terminology Change:

Suggested Change: I propose changing the terminology from “Voluntary Contact” to “Community Interaction.”

Rationale: This adjustment is intended to dispel any misconception that “Voluntary Contacts” and “Field Interviews” are subsets of each other, emphasizing their separate and distinct classifications. The revised terminology creates a clearer distinction, mitigating the possibility of misclassification.

2. Definition of “Community Interaction”:

Suggested Definition: “Community Interaction” is defined as a consensual encounter facilitated by law enforcement officers with community members for the purpose of (i) engaging in pleasantries, (ii) engaging in casual conversation, or (iii) providing assistance in public service or community engagement matters.

Additional Aspects: Community Interactions are devoid of any investigative purpose, explicitly excluding inquiries into criminal activities. No written documentation or activation of Body-Worn Camera recording is mandated unless expressly specified otherwise. If, during a “Community Interaction,” a law enforcement officer acquires information related to a suspected crime and subsequently initiates an investigation, the interaction ceases to be classified as such and, at minimum, transforms into a “Field Interview.”

C. De-Escalation and Use of Force

The draft policies provided for community comment require officers to use de-escalation to avoid the use of force, instructing that officers shall, unless it is not possible to do so, avoid the use of force by employing de-escalation techniques. In this regard, the draft policies direct an officer to use time, distance, and cover to avoid the need to use force whenever it is possible to do so. In addition, the draft policies dictate that officers shall not use force, except when: (1) de-escalation techniques are not effective, appropriate, or feasible; (2) no reasonable alternative exists; (3) based on the totality of the circumstances, a reasonable officer would know that the use of force is reasonable, necessary, proportional to the aggression or resistance, or to prevent an imminent

threat of physical injury to themselves or another person or to achieve another legitimate law enforcement purpose (such as to restrain or subdue a person who is lawfully being seized and is actively resisting or evading arrest or detention, or to bring an unlawful situation safely and effectively under control).

Finally, the draft policies also mandate that officers shall not use Deadly/Lethal force, except as a last resort, when de-escalation techniques and less lethal force options are not effective or feasible, and when a reasonable officer, based on the totality of the circumstances, would know that such action is immediately reasonable, necessary and proportional to protect themselves or another person from an imminent threat of death or serious physical injury.

1. Perceived Lack of Definitions/Clarity

Several comments related to what commenters appeared to characterize as a lack of definitions or clarity regarding when officers may be permitted to use force.

- Policy 101 – Vision, Mission, & Guiding Principles:

Of the guiding principles, one that is ‘missing’ is judiciousness/restraint. A call for knowing when force should and should not be used and aiming to use as little force as necessary in all situations. I know there is a ‘use of force’ document, but I believe this should also be a guiding principle.

- Policy 402 – Use of Force:

1. Many of these policies depend on ‘effectiveness’ and ‘reasonable officers’ but both of those terms have no clear definition and could be abused.

2. No description of punishment is given for when officers unintentionally break these rules. Breaking rules is still breaking rules and if ‘intention’ is the criteria for punishment or not, this can and will be easily abused.

Pg 1. Paragraph 3/4. How is effective defined? How is a ‘reasonable officer’ defined/assessed?

Pg 5: Anticipatory Force: Is bouncing on your feet a reasonable trigger for anticipatory force? What is level of anticipatory force used in these circumstances?

Pg 7: Reasonable: how do we define an ‘objectively reasonable officer’?

Pg 9: Passive resistances: is going limp a sufficient metric in so far as going limp may not be intentional? Pg 14: IV. C. ‘The escape of the person would pose an immediate Threat of Serious Physical Injury or death to the officer or another unless the person is apprehended without delay.’ How can you apprehend them if you are using lethal force? Why ‘when feasible’ on identifying yourself. Pg 15: IV. E: “The unholstering or withdrawal of a firearm from the holster, without the firearm being pointed at an individual, is not considered a reportable use or threat of force. “

Unholstering is in fact a threat of force whether implicit or explicit. Pg 19: VI. B.: “Officers shall not use any weapons or any non-de minimis force against a youth that is under the age of twelve (12) years old.” why is 12 the cutoff? What separates the necessity to not use this type of force on a 12yr old vs a 13yr old? Pg. 23. VIII.:

“an officer who intentionally violates the Maryland use of force requirements resulting in serious physical injury or death to a person is guilty of a misdemeanor” Is it just a misdemeanor of intentional use of lethal force? What about unintentionally breaking these rules? What is the punishment then? If I unintentionally kill someone [t]hat is still a crime!

- Policy 402 – Use of Force:

There is simply no way to frame a police body that is supposed to use force “when the force is reasonable, necessary” as a positive addition to the community. There is simply no way to stop the presence of the police from bringing more violence to our community. The directive explicitly saying that an officer shall use force “when, based on the totality of the circumstances, a reasonable officer would know that such action is reasonable, necessary, proportional to the aggression” immediately shows me that JHPD will function JUST LIKE all other police departments in the country, with the dangers and violence that they present to citizens. I am scared as a homewood neighbor.

- Policy 410 – Foot Pursuits:

It limits use of taser devices “Use a Conducted Electrical Weapon (CEW) to stop a suspect fleeing on foot unless the totality of the circumstances would support the use of deadly force...” but, strangely, does not restrict the use of other weapons or firearms. I would suggest a few more limitations:

In Section III or IV – not pursuing beyond the jurisdictional limits of the JHPD (though this might be implied)

In Section III– limit the use of other weapons and firearms during foot pursuit, unless the suspect is engaged in active aggression that is posing an immediate public threat.

- Policy 481 – Active Assailant Response:

If the policy is cloaked for the purpose of safety, by what means is such a policy modified?

2. Concerns Surrounding Armed Officers

Some comments focused on concerns regarding officers being armed while on and off duty and with various weapons, particularly firearms.

- Policy 403 – Authorized Defensive Weapons:

Any weapon that is carried will be used. Limit “regular carry” weapons to non-lethal options only. Mandate that firearms, or any weapon with lethal potential, be locked and secured at all times (in vehicle), and a log kept of each and every time it is accessed.

- Policy 403 – Authorized Defensive Weapons:

Officers must not be able to carry their service weapons off-duty. There is no accountability off-duty: no body-worn camera, no supervision, no formal obligation

to serve the community. This policy will just result in more guns on the streets of Baltimore without accountability. What reason does the University have for allowing officers to carry lethal service weapons while off-duty? This puts the community in urgent danger. What circumstances will officers be told is appropriate to discharge their service weapon while off-duty? (If none, then they should not carry off-duty.) What sort of investigation and who will conduct the investigation into incidents where off-duty officers discharge their service weapon? What is the discipline policy and how will officers be held accountable for off-duty actions? Is the service weapon effectively a privately-owned weapon while off-duty? This is delinquent and reckless policy and appalling to see in a formal policy draft for a private police force that will police public spaces. This MUST be addressed before any more progress forward can be made. The public will not allow the University to threaten the community with unaccountable guns.

Similarly, several comments expressed concerns about the arming of officers as envisioned in Policy 404 - Patrol Rifle, which ensures that officers are prepared and properly equipped to face the potential threat posed by an active shooter or assailant.

- Policy 404 – Patrol Rifle:

Are you guys actually serious in freaking having rifles around/near campus?? This level of weaponry is ABSOLUTELY NOT NECESSARY, even normal police simply carry handguns. This is so blown out of proportion and it's clear no one in the JHU community wants this, stop aggravating violence with violence. Stop trying to instill fear in both Hopkins students and the surrounding community.

- Policy 404 – Patrol Rifle:

As a [redacted] who have been working on the East Baltimore campus for [redacted], I question the necessity of arming patrol officers with the M4 Colt semiautomatic rifle as mentioned in the 404 section of the draft policies. This seems to be a disproportionate response to the kind of security issues prevalent around the EB campus (mostly petty thefts and unarmed assaults, only very rarely armed robberies, and shootings with small arms on extremely rare cases). The kind of heavily armed assaults these patrol rifles are supposed to counter as mentioned in 404 has never happened on the EB campus. The sight of semiautomatic rifles on campus can be very threatening to students, staff, faculty and patients alike. It will no doubt damage the image of Johns Hopkins University as a renowned institute for learning and healing and further strain the relationship between the university and the surrounding communities. It will also have a chilling effect on the peaceful expression of political and personal opinions on campus. This also seems to be an intentional escalation of security measures on the part of the JHPD, as I do not ever recall BPD officers patrolling around the area carrying semiautomatic rifles. I strongly oppose this policy proposal and would like to see an explanation of the rationale behind it.

- Policy 404 – Patrol Rifle:

We do not need semiautomatic weapons on a college campus and a hospital. This is ridiculous. These are not military zones. Why is a Colt M4 Carbine necessary and what alternatives were considered? Why are nonlethal weapons like a taser not sufficient? What situation does the University envision would require a semiautomatic rifle?

We demand answers to these questions, not platitudes and redirection to the very policy we're critiquing. There is no accountability if you never answer people's genuine questions.

3. Use of Force Incident Reviews and Investigations

Other community members expressed concerns about the review and investigation of use of force incidents. This feedback appeared to reflect a desire to ensure the appropriate supervision and review of use of force incidents and a review process that provides transparency to the community.

- Policy 407 – Use of Force Review, Assessment & Investigation:

Consider mandatory review of body camera footage in all use of force encounters (UoF). Even for level 1 encounters, without feedback from a supervisor on whether the UoF was appropriate and whether the level was appropriate, the officers cannot modify their behavior.

b) Consider mandatory mental health specialist appointments/check-in for level 2 or 3 UoF.

c) Offer peer and/or small group mental health counseling for all officers on a monthly basis

d) Consider adding UoF data to publicly available dashboards while ensuring confidentiality of the people involved. I added these bullets from Procedures II, D which I think could be publicly reported. Aim to have data uploaded in a timely fashion (~1 month after incident)

- *The nature of the incident;*

- *Where (can be general location if needed) and when (date and time) the incident took place;*

- *Location type of the incident (using location codes from the National Incident Based Reporting System (NIBRS));*

- *Whether the incident was in response to a call for service or an officer initiated action;*

- *Reason for the initial contact.*

- *Race, gender and approximate age of person on whom force was used*

D. Diversified Response

The policies distributed for public feedback articulate the goal for JH's public safety system to deploy an appropriate level of response tailored to an individualized situation as armed officers are unnecessary to address a host of community issues that may arise. Rather than having police

officers respond to all manner of community problems and issues, the draft policies are geared toward ensuring that officer response is limited to situations that implicate an imminent or acute risk of harm to an individual.

Consequently, non-JHPD resources are designated explicitly in policies as primary responders for a host of calls and community problems that do *not* implicate imminent harm – from lock-outs and lost property issues to disputes and drug and alcohol violations. To this end, the policies envision that JHPD will rely on the Behavioral Health Crisis Support Team, a joint JHU team that pairs mental health clinicians with campus public safety officers (and JHPD officers in limited circumstances) to respond to those within the campus area who experience a behavioral health crisis. As outlined in the draft policies reviewed by community members, the approach aims to have those with the best training, most relevant experience, and applicable capabilities take the lead on addressing community issues.

Several community members expressed approval regarding this diversified response approach, including to those experiencing behavioral health challenges.

- Policy 416 – Behavioral Health Crisis Dispatch:

I am relieved to see that officers will be trained to recognize behavioral issues and to differentiate between types of intervention needed. The more that JHU personnel-critically, those interacting with individuals during these calls/interventions- can be fully trained to recognize and attend to behavioral health crises, the safer we will all be. Thanks for your thoughtful approach here.

- Policy 415 – Individuals with Behavioral Health Issues & Impairments

Several providers in the larger community are also available to assist officers and telecommunicators. These include, but are not limited to:

- *National Alliance on Mental Illness (NAMI) Metro Baltimore - (410) 435-2600*
- *Baltimore Crisis Response, (410) 433-5175*
- *National Alliance on Mental Illness (NAMI) Maryland, 1-877-878-2371*
- *Maryland Behavioral Health Helpline, 211, press 1*
- *National Alliance on Mental Illness District of Columbia (NAMI DC), (202) 546-0646*
- *Washington DC Access HelpLine, 1-888-793-4357*
- *National Alliance on Mental Illness (NAMI), 1-800-273-8255*

DRAFT

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- *Maryland Mental Health Association*
- *Maryland Psychological Association*
- *Maryland Youth Crisis Hotline*
- *Mental Health Association of Maryland*
- *National Suicide Prevention Hotline: 988*

COMMENTS: worth confirming which offer non-English languages. officer may start the call, but if they need to pass the call to a community member, they need to know which options accommodate for other languages. 988 does.

E. Jurisdiction and Cooperation/Coordination with BPD

Just as JHPD's actions must be specific and focused, so too must be its geographic scope. Maryland law requires, and JHPD policies mandate, that Department activities beyond the physical boundaries that primarily consist of JHU's Homewood, Peabody, and East Baltimore campuses are limited and that JHPD may only cross these boundaries under exceptional circumstances.³⁵

Feedback concerning this theme consisted of focused questions related to JHPD's areas of operation compared to those of the BPD and inquiries as to standard operating procedures when the JHPD and BPD operate in areas where their jurisdictions overlap.

- Policy 101 – Vision, Mission, & Guiding Principles:

This comment pertains to the statement of jurisdiction areas, as reported here: <https://publicsafety.jhu.edu/community-safety/jhpd/jurisdiction-boundaries/>. It appears that those public areas adjacent to JHU properties may have overlapping jurisdiction with the Baltimore Police Department. In those areas, and where JHU police guidelines differ from Baltimore police guidelines, which are followed? Historically, when given any leeway, the default has trended toward the more violent allowed procedures. Clarity here would be beneficial.

- Policy 103 – Rules of Conduct:

In section VII, it states: "JHPD officers have limited powers of arrest outside of the campus area". As an organization that touts being inclusive of the community, I cannot see how policy is acceptable. Before even being created, there is already a wish to expand the jurisdiction of the JHPD. Community members are not (and in my opinion should not), have to be concerned about being accosted by JHPD members outside of JHPD jurisdiction. Will a map CLEARLY MARKING the lines of JHPD jurisdiction be created and disseminated to all involved parties? If these lines of jurisdiction change, will the public be notified? If so, how quickly before

³⁵ Per the Memorandum of Understanding with the Baltimore Police Department and the CSSA, JHPD police officers may not exercise police powers outside of these jurisdictional borders unless: "1) JHPD is engaged in fresh pursuit of a suspected offender; 2) it is necessary to facilitate the orderly flow of traffic to and from a campus area; 3) specially requested or authorized to exercise powers in Baltimore City by the Mayor of Baltimore City if there is a sudden and unforeseen emergency of such public gravity and urgency that it requires an immediate response to protect the public welfare, and the Mayor issues an order declaring an emergency that specifies the manner in which the police officer may exercise such powers; or 4) the Governor grants such an exercise of powers pursuant to a declared state of emergency. Importantly, an authorization that permits the JHPD to exercise police powers outside of the JHU campus area terminates when the emergency declaration by the Mayor or Governor sunsets. In addition, according to the CSSA, JHPD may increase its jurisdiction outside of the confines of the current one "only if the University receives a majority of support from the members of the relevant campus-adjacent communities for the police department to operate in their communities and the Baltimore City Council approves a resolution affirming that the University has received the support required under this paragraph and specifying the campus-adjacent community areas in which the police department is authorized to operate."

those changes are made? Is there a non-JHPD or BPD body or organization(s) that will be responsible to reviewing the conduct of JHPD officers that are non-compliant with this document?

- Policy 201 – Authority, Department Organization, and Command:
“However, JHPD officers shall not take extra-jurisdictional action solely to protect property. ” This provision seems to be clear for urban campuses with clearly defined and/or confined spaces. It seems less clear for JHU campus areas that is so fully integrated into a patchwork of urban city streets. The provision seems to place future JHPD officers in the potentially difficult position, of seeing a property crime across the street and not being in a position to respond (Where such street is the campus area boundary). JHU Community members know that at the moment Baltimore City is going through a property crime spike, including car thefts and break-ins. In such circumstances, Will this provision actually be workable?
- Policy 425 – Community Policing & Problem Solving:
I am a little confused on the patrol area, but I am certainly soooooo happy that this police force is coming. As a daughter of a [redacted] Police Officer, our Safety is so incredibly important and he has drilled into my head what to look out for. With the violence in the city, I am terrified to drive to work. I was wondering if there would be patrols from Madison Street coming from Route 40, and then Monument street heading back to Route 40.
- Policy 427 – Patrol Operations
Like so many other Baltimore residents who have expressed opposition to the JHU private police force, I find it unconscionable that a private organization could hire armed personnel claiming a spurious jurisdiction over Baltimore neighborhoods. A private police force answering to an unelected administration with an indefensible track record of perpetuating injustice represents an explicit threat of violence that I refuse to accept.....

Several comments on the Traffic Control and Enforcement policy raised issues about the degree to which JHPD might prioritize traffic enforcement and where such patrol might occur.

- Policy 442 – Traffic Control & Enforcement:
A couple of questions on this section: 1. I am unable to find the policy that prevents parking police cars on sidewalks, in crosswalks, or in bike lanes? is there a policy that prevents blocking of the right-of-way of the most vulnerable road users, those who are not in cars? 2. Considering the greatest health and safety risk to the Johns Hopkins students and staff are drivers, what will the relative priority of traffic safety be?
- Policy 442 – Traffic Control & Enforcement:
This directive reveals that JHPD is attempting to exercise a greater degree of control over the surrounding community than Johns Hopkins claims in its public

statements. Forty pages of traffic directives is excessively long for the publicly stated purposes of JHPD.

- Policy 442 – Traffic Control & Enforcement:

The jurisdiction of the proposed force is supposed to contain the three major Hopkins campuses and only a modest footprint outside of them (so as to encompass property Hopkins owns, rents, leases, or controls that may be adjacent or near the major campuses). Why does the proposed force have a traffic control policy at all?

F. Personnel Recruitment and Selection

As codified across the draft policies circulated for community comment, JHPD is planning a recruitment and training program designed to attract personnel committed to the mission, vision, and values of the Department by:

- Recruiting well-qualified entry- and lateral-level candidates;
- Offering police officer opportunities to qualified existing members of the Johns Hopkins Public Safety Department;
- Utilizing a strict selection process designed to identify candidates appropriate for serving the JH and Baltimore communities;
- Embracing new technologies and innovative approaches to enhance police effectiveness and efficiency;
- Providing not only basic police academy instruction, but also JHPD-specific training relative to the mission, vision, core values, and policies of the Department as well as a comprehensive field training program focused on service and accountability-driven policing.

Overall, community feedback on personnel selection and management indicates that many community members are significantly invested in hiring an ethical, fair, and impartial police force.

1. Minimum Requirements and Background Investigations

Comments regarding recruitment and selection centered around minimum requirements and background investigation and selection processes to ensure that only the best-qualified officers join the JHPD.

- Policy 302 – Recruitment and Selection:

...To that end, I think the minimum requirements for employment for the JHPD should include a bachelor's degree from an accredited four-year institution. The minimum degree required to be a librarian in this country is a master's. Yet, an armed police officer is only required to hold a high school diploma or a GED. I think that's absurd, not only because it means that officers are not necessarily

educated in the quantitative and qualitative ways that would make them better members of a police force, but also because they won't necessarily understand the culture of a campus, like ours. Secondly, the 25% minimum residency requirement is frankly ridiculous. It should be 65% at a minimum.

- Policy 303 – Background Investigations:
Police officers are in a position of power within a community and have the potential to do great and grave harm. They MUST be held to a higher standard of background investigation than is typical with hiring policies.
- Policy 301 – Personnel Management:
Does the background check ensure that JHPD employees do not have any previous affiliation with security threat groups such as gangs or white supremacy groups? Can JHPD offer recruitment events or incentives for officers from Baltimore city? This could allow for officers to have stronger ties to the communities they serve.
- Policy 303 – Background Investigations:
Background investigations are touched on within JHPD Policy #302, Recruitment & Selection, and this should be worked into that subsection as it is part of the selection process. JHPD should also be using a separate law enforcement agency to have background investigations completed. This would avoid any biases that could occur and would conform with other local law enforcement agencies' practices.
- Policy 302 – Recruitment and Selection:
The use of polygraph examinations has been proven to be incredibly flawed due to a lack of standardization and subjectivity in the interpreter's reading of the results, and therefore, are no longer admissible in court. This is another point where Johns Hopkins and JHPD could be a progressive leader in law enforcement by no longer utilizing polygraph or truth verification examinations (however, this would be a complete separation from other agency minimum qualifications for employment).

2. Lateral Officer Selection Process

Other community feedback concentrated on the importance of the JHPD to gain access to a lateral candidate's disciplinary records to ensure that only qualified lateral officers are permitted to join the JHPD.

- Policy 302 – Recruitment and Selection:
How are you going to ensure candidates with a history of misconduct at other police departments are not hired?

- Policy 302 – Recruitment and Selection:
*Someone should not be hired if they have previously been fired from a different police department for misconduct. Candidates should undergo implicit bias assessments and psychological assessments in the initial screening. Scores for this should be reported to the hiring team.
Having tattoos or other intentional marks should not disqualify someone from being hired, unless these marks are affiliated with hate groups, gangs, or identity-based hate.*
- Policy 303 – Background Investigations:
Hello, I'd like additional information about background investigations, specifically how they will be processed when the officer has been employed by a jurisdiction that makes it difficult to access police records. According to this article, (<https://www.delawareonline.com/story/news/politics/2023/06/02/delaware-police-misconduct-records-public-legislation/70282472007/>), "Under current state law, police disciplinary records are required to be kept secret from the public, including from criminal defense attorneys. The only non-law enforcement group that can access these records are attorneys representing people who sue the police for physical injury or damage." How will this be handled should an officer from Delaware apply for a job with JHPD?
- Policy 303 – Background Investigations:
Section IV (B). – I applaud that this section is specific about assessing candidates' prior record as an officer, including any resignations during ongoing investigations. This language has been part of legislation to reduce the problem of "gypsy cops." Given that many "gypsy cops" have ways to obscure their prior police records, I suggest including a clause that not being able to access a prior police record (if there is one), should also be a disqualifier for employment. Section IV (C). This section could also specify that JHPD would not hire people with evidence of participation in international or domestic terrorist groups, as identified by the FBI, US GAO, or Homeland Security. The social media review may help identify if people are affiliated with these groups.

3. Past Marijuana Use

Some feedback also recommended that the JHPD clarify whether previous or current marijuana use would disqualify potentially qualified candidates.

- Policy 303 – Background Investigations:
Thank you for the opportunity to submit comments. Perhaps I missed it, but the policy should be specific about past and present marijuana use and how it will be considered, if at all, in the selection process.

4. *Selection Process*

Another area of feedback addressed establishing safeguards to remove implicit bias from the selection process and ensuring multilingual skills. Other comments emphasized the absolute necessity for the JHPD to prevent, as best it can, the hiring of biased officers through appropriate vetting.

- Policy 302 – Recruitment and Selection:
I'd suggest an addition regarding the preparation of panelist and interview committee to effective (and with minimal/no bias) participate in the interview and selection process. Could there be a required training on Mitigating Unconscious Bias in Hiring for participants, such as the one OID provided?
- Policy 302 – Recruitment and Selection:
Thanks for the opportunity to submit feedback. The JHPD should value language capacity in recruitment, so at least some of the officers are able to communicate with people who don't speak English. In particular, it would be great if Spanish-speaking ability were an asset in the application process.
- Policy 302 – Recruitment and Selection:
Each section represents an opportunity to reinforce principles of equity and anti-racism. This section could be stronger by adding requirements for: (1) candidate's attestation of commitment to equity in its various forms; (2) candidate's satisfactory completion and performance on anti-bias training tests (e.g., Shoot-no-shoot training; Implicit Association Tests, or others); (3) stipulating a role for an "equity officer" within the Department; and (4) in section I.G., adding that the annual recruitment review will include review of the existing workforce and particularly who occupies which ranks in the organization, by race and gender Section IV(M). For panel reviewers, this should specify that one must be a non-Hopkins student or employee who lives in Baltimore City; this is because it is possible that the stated composition could mean only internal to Hopkins people are included in the panel review, to the exclusion of community members who may be affected by the JHPD but who do not have a direct affiliation with Hopkins Section VI (B). In several places, marijuana is singled out as a substance that would lead to the disqualification of candidates; however, this seems at odds with recent laws in Maryland and Baltimore that have decriminalized marijuana possession and allowed amounts "for personal use." To align with the current laws, marijuana should be removed from these sections.

G. Officer Safety and Wellness

Community members provided several recommendations on ways to improve wellness support for JHPD officers. These comments appeared to reflect some community members' recognition of the need to prioritize wellness in light of its relationship to performance in the field, officer recruitment, and employee retention.

- Policy 101 – Vision, Mission, & Guiding Principles:

I would include training that helps officers see their evolving perceptions and possible bias toward a group. I served as a police officer in the military and noticed my perceptions of the world changed as I responded to specific calls repeatedly. You interact with only the 'bad' parts of the community, which can change your views of the world. While I was at [redacted] we had Anti Stockholm Syndrome training every month to ensure our perceptions of the detainees did not change and put us or them in danger. I'm not sure if they've developed something similar for police to help deter the effects that responding to violent calls has on their perception of the world and the community.

There is also a concern after the use of force, officers are sometimes put on paid leave. There should be check-ins with the officer if this is part of the policy. I've seen departments that will have a peer take the officer home and sit down with the officer and their family to help them navigate the emotional highs and lows they may experience after a use of force call. They also outline when the officer or the family member may notice things of concern and who to call for help. It's helpful to have some trained peer support in the department to ensure the officers' mental health is a priority.

Lastly, I'm curious if you could have a policy that helps officers who work midnights and may have to complete administrative tasks (court, or whatever JHU admin requirements) during the day. The midnight officers' sleep patterns are normally disregarded, but I would try to ensure there is a way to protect their sleep and off time. You can set their admin tasks right as offices open, or if there is court, try to work to have their cases first. Protecting sleep hours is critical to ensure the safety of the officers and the public. We need our officers who work the midnight shift to be able to get enough sleep to remember all the policies outlined above, make complex decisions, and have the bandwidth to interact with JHU and the community respectfully. None of us make optimal decisions after a night of bad sleep, let alone a week of bad sleep.

I appreciate the efforts with this and think it'll help shape other policing efforts.

- Policy 301 – Personnel Management:

Consider adding a section on mental health wellness – providing not only free counseling upon request or after a traumatic work-related event, but also offering weekly, drop-in peer counseling opportunities. The informal peer counseling should not take attendance or keep medical records so that officers may attend without concern of it impacting their future career outside JHPD (thinking of military positions which can reject applications due to use of mental health services)

H. Accountability

Johns Hopkins' commitments regarding the JHPD will only be as strong as the oversight systems that hold the JHPD and its officers accountable to rules and norms of constitutional policing. To this end, Johns Hopkins and the JHPD will need to comply with several accountability measures mandated by the state, which the policies distributed for community feedback aim to codify.

Specifically, the Community Safety and Strengthening Act that authorized the JHPD also required JHU to “establish a University Police Accountability Board.” The JHAB enables community members to share community concerns regarding the JHPD directly with Department leadership, review police department metrics, provide feedback on existing policies and practices, and suggest ideas for improving JHPD policies, procedures, and performance. Beyond the JHAB, two additional bodies – the Civilian Review Board of Baltimore City and the Baltimore City Accountability Board – provide supplementary oversight over the JHPD. Three organizations, besides the Johns Hopkins administration, have the authority to play a primary and crucial role in overseeing and advising the JHPD. This results in one of the most comprehensive university policing oversight systems in the country.

Additionally, Johns Hopkins' policies establish the Public Safety Accountability Unit (“PSAU”) of the Johns Hopkins University & Medicine Office of Hopkins Internal Audits (“OHIA”),³⁶ as an entity independent of the JHPD and Johns Hopkins Public Safety to conduct all investigations of potential police misconduct, whether generated from external or internal complaints or internal investigations.

1. Accountability Process

The ample feedback on accountability concentrated on the JHPD process to hold its officers accountable if misconduct occurs, along with queries concerning the procedure for the community to file complaints against JHPD officers. Others probed how the various functions will interact with each other to ensure they provide the appropriate level of oversight over the entire process.

- Policies 101-111:
Unclear why “Responsibility” is used, rather than “Accountability” – likely for Baltimore/JHU community, these are different – is there a reason? –OR – Add “Accountability” ...ie: “Conduct, Responsibility & Accountability” to name of this Section. While there is language on need to report misconduct when it is observed... Is there explicit language here regards “failure to report misconduct/abuses” or “misleading any internal investigation” or “covering-up of misconduct/abuses,” which should also constitute misconduct.

³⁶ The Executive Director of the OHIA reports directly to the Audit Committees of the Boards of Trustees for both The Johns Hopkins University and The Johns Hopkins Health System rather than the President of either of these entities.

- Policy 103 – Rules of Conduct:
If an officer reported for violation of ethics or professionalism such as sexual misconduct, unnecessary use of force, harassment, making malicious false statements in reports or towards citizens, refusal to disclose their status as an officer or name or badge number to anyone requesting, etc. they should be suspended without pay until confirmation that the accusation is false. If the investigation finds there was a violation, the officer should be dismissed without possibility for rehiring.
- Policy 106 – Fair & Impartial Policing:
Who will comprise the Public Safety Accountability Unit (PSAU)? Which people(s) or institution(s) BESIDES the JHPD and BPD will create and sit on this board? Will you invite members of the community to participate? Will you invite members from the Hopkins community to have a say or have an opportunity to participate on this board?
This section also mentions several reports that will be collected, run, and reviewed internally. Will any of these reports be made to the public? What types of transparency will the public have regarding these reports?
There seems like almost zero outside person(s) or organization(s) that can participate in the audit process? If accountability is only internal and within Hopkins, this police force should not be created unless and until there can be more non-police members of the community to make this different than the policing that has harmed many, but especially those people who are more vulnerable (limited English proficiency, mental health disorders, BIPOC³⁷, among many others.
- Policy 350 – Complaints Against Police Personnel:
There is no mention of including the State’s Attorney Office (SAO) and their Police Integrity Unit anywhere when they should be informed since they have authority over all cases. Our office has confirmed that the SAO would need to be informed and supportive of this action...Under Definitions, the Administrative Charging Committee (not Baltimore City Administrative Charging Committee as written) definition is not entirely correct. The ACC reviews investigations for the complaints filed with the PAB and will then decide on the disciplinary outcomes. Under Definitions, Disciplinary Suspension should end after the first sentence. The items consisting of “a - e” need to be in the policy itself. Under Definitions, the Police Accountability Board (PAB) definition is not entirely correct. The PAB does not appoint required members to the ACC and Baltimore Trial Boards. They only appoint two members. Under Procedures, the subtitle label, VIII. Classification and Assignment should be deleted because “B.” below the subtitle belongs under the prior subtitle, VII. PSAU Supervisor or Investigator Actions, as it is duties the PSAU is to perform.

³⁷ Black, Indigenous, People of Color.

- Policy 350 – Complaints Against Police Personnel:
 - *All means of complaint should have a phone/verbal option & be available in English & Spanish. Google translate is not sufficient for websites.*
 - *All means of complaint should have a phone/verbal option & be available in English & Spanish. Google translate is not sufficient for websites.*
 - *JHPD website is English only*
 - *PAB website (not under JH control) has google translate only. Phone number goes to English language voicemail & gives email address that does not match what's on website.*
 - *CRB website does have Spanish version of complaint form*

- Policy 354 – Civilian Review Board Complaint Procedures:
 - I. Required Actions*
 - A. An individual who claims to have been subjected to or witnessed an act of abusive language, harassment, false imprisonment, false arrest or excessive force by a JHPD officer, or an injury allegedly resulting from excessive force caused by a JHPD officer, shall be informed that they may file a complaint at the JHPD PSAU, the Maryland Legal Aid Bureau, the Maryland Commission on Civil Rights, the Office of Equity and Civil Rights, or any JHPD station.*
 - COMMENTS: Information about how to contact these agencies in languages other than English will need to be available & updated annually.*

- Policy 354 – Civilian Review Board Complaint Procedures:
 - Thank you for the opportunity to submit comments. The JHPD should consider developing an explainer on the composition and role of the various boards, including the PRB, CRB, and PSAU. The explainer should cover what work each board will be released to the public.*

2. Supervisor Roles and Responsibilities

Some comments focused on ensuring supervisors are held accountable for upholding the policies.

- Policy 101 – Vision, Mission & Guiding Principles:
 - a) Policy Enforcement: CONSIDER ADDING Accountability & importance of Policing Work Environment (Ref. #111, etc) that minimizes risks of misconduct/abuse - Such AS: Managers, supervisors and commanders are accountable to create and maintain an work environment that prevents misconduct and are responsible for taking appropriate measures to achieve this.*

- Policy 111 – Duty to Intervene:
 - It is clearly stated all members have “affirmative duty” to intervene, should also it be explicitly stated that failure to intervene may be reviewed and may constitute misconduct? b) III. Required Action B. Supervisors shall & C. Commanders shall ... CONSIDER ADDING – supervisors and commanders shall create and maintain*

a work environment that ensures active bystandership is pursued when appropriate.

3. The Intersection of Accountability and Transparency

Other comments recommended that officers be easily identifiable to foster transparency with the community.

- Policy 350 – Complaints Against Police Personnel:

The New JHPD places a strong emphasis on accountability and transparency. To ensure this, all personnel should be required to wear a prominently displayed nametag or identification number at all times while on duty. This practice only helps in easy identification of JHPD personnel within the community but also sets a positive example for law enforcement agencies across the nation. By being a trailblazer in this regard, the new JHPD aims to foster trust, transparency, and accountability in policing, ultimately enhancing the quality of service we provide to our community and setting a standard for law enforcement agencies nationwide. If you have any questions about this proposal do not hesitate to contact me.

I. Transparency

The comments concerning transparency highlighted the necessity for JHPD to function as an open, data-driven agency for a multitude of reasons, including so that it can nimbly share specific data points with the community to ensure that the community is fully informed of JHPD operations.

- Policy 101 – Vision, Mission & Guiding Principles:

Data analysis: The JHPD should consider a policy in support of the use of data to drive policing. Some standing analyses should be explained, such as data on differences in enforcement by race and genderor data on the types and locations of calls for help...or data on the types and locations of criminal activity. Research: The JHPD should consider a policy that creates space for discussion of new research on policing, so that the Department is able to put important insights into practice quickly, for example, if a type of evidence collection is found to be erroneous or prone to bias, the JHPD can discontinue it.

- Policy 101 – Vision, Mission, & Guiding Principles:

The policies do not make clear what information will be released publicly, versus kept internal to the JHPD. The JHPD should consider a transparency policy that lays out what information will be available where, either proactively or by request. Such a policy could facilitate greater accountability and community trust.

- Policy 210 – Records Management:

Could the JHPD make certain aggregated data publicly available via a dashboard about arrests? Very simple demographic data like race and gender and whether the

person was a minor or a JHU affiliate. And then type of crime (broad category). Similar to the BCPD Accountability Dashboard. Could the JHPD describe their process to ensure the cybersecurity of the criminal records and other files?

- **Policy 302 – Recruitment & Selection:**

G. Annual Recruiting Review & Analysis – A documented review of the law enforcement workforce shall be conducted annually by the Human Resources Director, at the close of each fiscal year.

COMMENT: Annual analysis should include mapping of demographics of officers and jurisdictions they're serving (and that they come from if they're from Baltimore City?) A check on representativeness? There is also a need for annual assessment of profile of candidates that recruiting events are generating. We should learn from HSCRC funded community health worker initiative at Hopkins. Partnership between BACH & Turnaround Tuesdays yielded essentially no Sp/Eng Latinx community health workers. One size does not fit all.

- **Policy 350 – Disciplinary Matrix:**

If it's not already in another section, I think this should include required annual reporting of police disciplinary actions.

- **Policy 350 – Complaints Against Police Personnel:**

Thank you for the opportunity to provide comment. Page 25. For the annual report, consider requiring demographic analysis, including the race and gender of people filing complaints (where known).

V. QUESTIONS AND COMMENTS ON THE POLICY FEEDBACK PROCESS AND NEXT MILESTONES FOR THE JHPD

In addition to the questions, comments, and recommendations regarding specific policies, the community shared significant sentiments regarding the policy feedback process. Additional feedback included questions about training that will accompany the draft policies. Another tranche of comments consisted of community recommendations on future policy formulations for the JHPD to consider and establish.

A. General Comments on the Overall Policy Feedback Process

Multiple community members expressed their appreciation for JHU's commitment to transparency in publicly sharing the draft policies and for the opportunity to offer their feedback before they are finalized. Several commenters further expressed optimism and hope for the JHPD and its future.

- *I appreciate the effort and thoughtfulness put into these policies.*
- *These are great, I appreciate the transparency between law enforcement agencies around the nation to inform best practices at Johns Hopkins University. As well to the student body of those like myself, who are studying online and perhaps even abroad, to be aware of their personal and human rights by way of law.*
- *Thank you for sharing the JHPD policies and guidelines. I have reviewed them all and find them to be well formulated, concise and comprehensive and have no observations. Really appreciated the opportunities I had to provide feedback and support for the initiative and will continue to follow its implementation and evolution.*
- *I agree with the policies and feel this is a very important step for the safety of the patients, staff and community surrounding JHH.*
- *Each of the policies look fair to me. I hope and pray they are effective in reducing crime.*

Other community members criticized, in some way or another, the difficulties involved in reviewing such a huge volume of draft policies within the 60-90 day public comment periods while juggling many other competing obligations. One recurring view was that the policy feedback process was another extension of JHU "going through the motions" of transparency and collaboration with the community when the University will simply ignore those comments and commenters not aligned with JHU's goals and objectives.

- *Frankly, this is insulting. Aside from the massive wall of text that this simply dumps on folks as a means to check the "we presented this to the community" box and the*

fact that to my knowledge you've not held direct meetings with most of the communities that your school sits inside of (I say this with direct knowledge as a member of one of those community associations), EVERY SINGLE SUBDOCUMENT that I opened has HUGELY PROBLEMATIC CONTENT that is dismissive or even contemptuous of the people whose lives these policies would directly affect. You think because you left hundreds of pages of text online for people to review you've somehow done some measure of due diligence? As if the people who are most likely to experience negative outcomes from encounters from your private police have the time and the means to comfortably and comprehensively review these documents? (And as if you'd even listen if they provided negative feedback, because – let's be honest here – you don't really give a shit what most of the community thinks about the idea of the JHPD or you wouldn't keep moving ahead with it). Your arrogance is simultaneously infuriating and unsurprising. Your ethics are superficial BS, and your perception of the community is well in line with the racism of both your founder and the historical legacy of your institution. But yea, make sure your cops play some basketball with the local kids. That'll do it.

- *This is really extensive and as a community organization, we don't have the capacity to thoughtfully review it in its entirety. We don't agree that Johns Hopkins should have a private police force. This is a very extensive document, filled with legal writing and as a community organization, it is extremely challenging to provide thoughtful feedback. That being said, we tried to focus on the section regarding Interactions with Youth, JHPD, JHPD Directive #426. However, even just looking at this one section, it references other documents that we did not have the capacity to review. At the bottom of page 3 you state, "Johns Hopkins is committed to adopting, incorporating, or otherwise reflecting recommended changes and feedback in the final version of policies so long as feedback is aligned with our values and commitments, permissible within legal parameters, and supported by national best practices for community policing and public safety." Given these parameters, there is already a framework that invalidates the feedback that we bring to the table and it silences authentic reform.*
- *The policy includes "working collaboratively with" and "engaging the community," when throughout the whole process, the community opinions seemed to be ignored. The attitude, voiced by former VP Daniel Ennis and others was essentially that, "we hear you, but we're going to do it anyway. While I am opposed to private police in principle, I certainly hope that engaging the community is far more than lip service.*

B. Comments About Next Milestones for the JHPD

While feedback from numerous commenters did not include specific actionable recommendations on revisions to the draft policies, many submitted questions about training referenced in the draft policies that they reviewed. Likewise, many community members expressed the desire for community input in developing certain curriculum and provided recommendations on future areas

of policy development for the JHPD, including but not limited to a thoughtful approach to drug crimes and policing within Johns Hopkins Hospital.

1. Training

Several comments identified the need for various types of training and included questions and/or recommendations on certain trainings referenced in the draft policies, particularly related to training development, delivery, frequency, and accreditation. In large part, the takeaway of this feedback was that many have a significant desire for community input in training development.

- Policy 102 – Professional Ethics:

In section IV, it states “all members of the JHPD will receive ‘ongoing and initial ethics training.’ What topics, specifically, will be addressed in these trainings? What is the frequency with which these trainings will be held? Who is the person(s) or institution(s) involved in the creation and dissemination of these trainings? How often will these trainings be updated? With the type and level of control and power that you are hoping the JHPD has REQUIRES more than once or twice yearly ethics trainings. These people need the space, capacity, and instruction to help them understand their own personal biases, as well as any cultural biases that the JHPD might have. It is my opinion that the person(s) and institution(s) that give these trainings MUST NOT be part of either the Baltimore Police Department (BPD) or the Johns Hopkins Police Department (JHPD). This might help to ensure that these trainings are done well, with intention, and are actually meaningful.

- Policy 106 – Fair & Impartial Policing

In section II, subsection H, it states “Members should consider relevant personal characteristics when determining the best way to serve certain members of the community, particularly those in crisis (e.g., behavioral health, housing status, addiction, limited English proficiency. etc)”. Will members of the JHPD be given training regarding resources that they can introduce community members too? If so, what specifically will the training(s) entail? How often will they be given? Who will be responsible for the creation and dissemination of these trainings? How will community members gain access to these resources by JHPD? There seems like almost zero outside person(s) or organization(s) that can participate in the audit process? If accountability is only internal and within Hopkins, this police force should not be created unless and until there can be more non-police members of the community to make this different than the policing that has harmed many, but especially those people who are more vulnerable (limited English proficiency, mental health disorders, BIPOC, among many others.

- Policy 109 – Procedural Justice:

In Section I, sections F&G discuss inability to comply (due to, but not limited to: Mental condition, Behavioral health disability, Developmental disability, Physical limitation, language or cultural barrier, or drug and alcohol impairment). It also discusses steps that JHPD members should take when interacting with a

marginalized community (LGTBQIA+ , students, racial minorities, and immigrants). Will members of the JHPD be given data-driven, appropriate, and regular trainings to help them identify and better understand these communities and the instances that have helped them to become distrustful of police? If so, which person(s) or institution(s) will be responsible for the creation and dissemination of these trainings? Will they be led by JHPD or BPD members? This might be an opportunity to invite members from those communities to discuss and to hopefully prove to community members that you value them and wish to take steps to do better in your service FOR THEM.

- **Policy 305 – Training and Professional Development:**
General comment on training, professional development, and field training programs. While these areas cover the “ accepted buzz words” ref. Policing a diverse community, somehow I am less than fully convinced that lateral, or probationary officers, but particularly lateral officers coming from areas of policing with little or no diversity, will embrace these concepts simply from “ Gap ” and standard field training. Particularly if they do not come from a diverse community and are unfamiliar with diverse populations. How does GAP or field training assess a lateral or probationary officer’s capacity for just or fair policing? - of course no one may have the perfect answer to this, but it should be fully considered and reflected in training as best as possible. -as one potential idea, Consider including in GAP training, a requirement for lateral and probationary officers to meet in some forum, members of the diverse communities they will be policing, and hear directly from these, their fears and concerns regarding just and fair policing.
- **Policy 305 – Training & Professional Development:**
*Mentions de-escalation techniques but not mental health crisis specifically (some mental health diagnoses first appear in individuals college age and exacerbated by stress-this might be a “cultural’ consideration for training for this population) “cultural responsiveness and diversity, equity and inclusion in police decision making will be completed with the Baltimore Police Department Equity Office and Educational and Training Unit”. – *** What does this curriculum look like? and will there be consideration and inclusion/input for cultural needs of a diverse adult student population?****
- **Policy 401 – De-Escalation:**
For policy 401, De-Escalation, one cycle of de-escalation training is insufficient. Consider an annual renewal and ongoing training. Also, consider having mandatory rotations in the downtown emergency department and Psych hold units at JHU, where staff, physicians and security deal with people in emotional and physical distress on a regular (constant) basis, and we are expected to provide treatment and keep people safe from themselves and others, without resorting to violence.

- Policy 401 – De-escalation:
There are named training programs mentioned in Section IV. Are these documented and is there a link in order to make an assessment of the appropriateness of these programs for the task at hand? Is there any type of accrediting or approval body external to the university that has indicated that these training programs are appropriate?

- Policy 420 – Domestic Violence
Comments on training for JHPD members:
 - 1) *Training should occur at least annually and in person.*
 - 2) *Training contents should be prepared, reviewed, and facilitated by gender-based violence experts prior to use.*
 - 3) *The material used for trainings should be made available to the public.*
 - 4) *Recommended additions to the training list of topics:*
 - Functioning as a responsible employee*
 - Commonly used resources*
 - How to conduct a trauma-informed response to calls for domestic violence, stalking and/or harassment, including cases presenting co-occurring crimes such as sexual or physical assault*
 - Impact of trauma on victims of domestic violence, stalking and harassment, and ways to minimize further physical and psychological trauma to victims -OIE training on Domestic Violence, Dating Violence, Stalking, Sexual Harassment and Sex-Based Harassment (as defined under the University’s Sexual Misconduct Policy and Procedures)*
 - Standards for report writing and documentation for preliminary investigations for cases involving domestic violence, stalking, and harassment*

C. Recommendations For JHPD’s Future Consideration

- *We do not recall reviewing a JHPD draft policy specifically relating to policing within the Johns Hopkins Hospital (JHH). While there will already be policy regarding Johns Hopkins security personnel within the JHH, We believe consideration should be given to drafting additional policy on JHPD officers’ interactions with JHH patients, medical providers, etc.*
Issues raised among committee members included the following:
 - a. *Policing of and policing services for JHH patients*
 - b. *Potential Vulnerability of patients.*
 - c. *Patient (or their representative) access to JHPD policing services.*
 - d. *Role of JHPD vs JHH Security personnel.*
 - e. *JHPD interactions with medical personnels within a medical care setting.*
 - f. *JHPD access to JHH restricted areas.*
 - g. *Medical records access, handling and privacy.**Again, some of these areas will be covered in existing JHH security policy, but given the added authority vested in sworn police officers, policy clarity on these and any related issues is recommended.*

- Policy 101 – Vision, Mission, & Guiding Principles:

The policies do not set out a thoughtful approach to the prosecution of drug crimes, the amnesty policy of the University notwithstanding. Rather the policies seem to treat drug crimes equivalent to other activities for police intervention. (In an extreme example, Policy 411, page 30, suggests that police officers may conduct a strip search if someone is thought to be in possession of fentanyl or heroin). Enforcement of drug crimes has not been shown to reduce the harms of drug use. The JHPD could be a model for a better approach focused on facilitating access to harm reduction and treatment. I recommend that JHPD leadership convene a discussion with experts on policing around drugs and, based on that consultation, develop a special policy on the issue of drug policing. I would be happy to facilitate this dialogue.

VI. GENERAL FEEDBACK ON JHPD

The public comment periods addressed in this report were designed to solicit feedback on specific JHPD draft policies. However, much like the public feedback received during the public comment period on the Memorandum of Understanding with the Baltimore Police Department (Fall 2022), many community comments provided more general feedback regarding the creation or generalized operations of the JHPD.

This section summarizes the broader themes and questions most identified by commenters. Although these comments did not specifically address JHPD draft policies, JHPD leadership should continue to be aware of and engage the community on the sentiments behind them and the issues raised.

Several individuals who engaged in the policy feedback process expressed support for creating the JHPD and equated the establishment of the department with anticipated increases in feelings of safety. Some examples are included below:

- *I love Baltimore and call it my hometown but I do not live in the city because of the crime. I think a JHPD would make Baltimore a safer place, which is why I support this decision.*
- *I am a neighbor and strongly am in favor of Hopkins having their own police force. This will be wonderful for the neighborhood! The safety of the students is most important and a safe neighborhood will enhance their experience at the university.*
- *It's great to see that JHU is adding more security. The code of ethics is extensive and considerate. Campus safety is one of the most important factors for me personally, when selecting the graduate program.*

For several community members, support for JHPD appears to be based on perceptions of, or direct experiences with, crime on and near one of the Johns Hopkins'som campuses:

- *JHPD is strongly needed to maintain safety and well being of employees especially on East Baltimore campus. It can be a force that can deter miscreants who are looking to make a quick buck off of JHU affiliates. Also its important that the force should not be used to harass or intimidate community members who are residing in the vicinity of JHMI campus.*
- *My husband works on the JHU Homewood campus. I would like to believe that he will be safe at work and walking to and fro to work. We live about 3 blocks from campus, we want to live in a well policed neighborhood. We encourage you to have a strong and fair police force.*

By contrast, other individuals who provided feedback opposed the establishment of the JHPD and argued that the presence of JHPD officers would make them feel less safe:

- *Is my firm belief that the JHPD do not in fact, contribute to the overall safety and well-being of the community. I believe they should be downsized and ultimately disbanded as the last thing our community needs is more policing.*
- *As a close-by to Homewood campus Baltimore resident, I am extremely against a JHU police force. The presence of such a force would be extremely detrimental to life and community on and off campus. I would feel significantly less safe in my neighborhood knowing a JHU police force was present.*

Others lamented that the policies were not explicit in establishing that the JHPD's primary function is to fight crime and that some of the policies created a challenging environment for the JHPD to effectively perform this function.

- *We are responded to several of the policies, which by-and-large should do well in giving anyone who wants to join the police force pause - not to mention future potential employees and students. Many of these policies tie the hands of officers to do their job and to keep THEMSELVES safe. Not only safe from physical harm but from action taken against them from an activist community and culture apparent at JHU (not just students and activist groups but JHU Administration). They also circumvent federal law. Regarding 486 - police should not allow anyone to block roadways or buildings, as has happened in the past at JHU. There should be no “de-escalation.” Get your point across by immediately arresting them and throwing them in jail. This will help dissuade future dangerous and potentially violent situations....It would take a month to go through the litany of policies and procedures here. And that’s the problem. You’ve created a monster, instead of putting your foot down to fight crime and keep students and staff safe. Before, we know in 2020 you wanted police gone, and now you’re begging to get them back. This is your happy medium, but you’ll have no one to blame for the increasing crime except yourselves once this crap is pushed through.*
- *I find it absurd that you have to really squint at section 101 to discover, in all the progressive verbiage, that the main mission of the police is to keep community members safe from crime AND deter and arrest those engaged in criminal activity. In fact, I’m not sure “detering and arresting those engaged in criminal activity” is really in the mission statement. It’s as if you are going to “keep the community safe” despite there not being any criminals to worry about.*

It appears that the views that many expressed of the JHPD are inextricably linked to general perceptions of policing and the ongoing national conversations about race and policing. In this

regard, a significant number of comments conveyed opposition to, or fundamental concerns regarding, the JHPD rooted in the apprehension of the potential harms of policing, including the over-policing of BIPOC communities. Indeed, several community members made clear their view that addressing the roots of crime rather than what they perceived as responding to crime by the JHPD would be a better use of the funds dedicated to creating the JHPD.

- *Baltimore students, community members, and activists have made it abundantly clear that a Hopkins-run private police force is not and will never be an acceptable use of funding, resources, staffing, or power in our community. Hopkins should listen to the voices of those most affected by police violence that this is not what we want and no amount of thoughtful policy crafting will erase the negative impact of having more law enforcement in our neighborhoods and on our campus.*
- *This is such a joke. “Progressive policing” is an oxymoron. Police represent the antithesis to “justice, humility, professionalism, respect, integrity, diversity, and equity.” The Baltimore community has made it painfully clear that more police, and specifically JHPD, are not wanted nor needed. It is with malicious disrespect that you are ignoring the community input and needs to force forward with a police force just so that wealthy white parents will feel safe sending their kids to Johns Hopkins and footing their inflated tuition bills that bankroll your undeserved and equally inflated salary. I urge you to scrap this effort and instead actually make genuine efforts to contribute to public safety, such as listening to the community and amplifying and supporting ongoing efforts by the actual Baltimore community to define and implement what safety means for them. Police do not prevent crimes, they respond to it. Calling police creators of safety is racist insult to people of color who suffer abuse from police every day in this country. I have no respect for police or anyone who supports them or tries to create more of them, and I hope the guilt of the evil you are engaging with haunts you for the rest of your existence. These efforts create JHPD make me ASHAMED to be a JHU [redacted].*
- *I believe every penny wasted on JHPD would see a tenfold greater reduction in crime if spent on community projects focused on housing, employment, and drug use harm reduction. This police force will at best be a misuse of funds and at worst may lead to abuse of power, discrimination, and suffering in the Charles Village, Remington, and Middle East communities. I oppose it at all levels, no matter how much it's doused in the gaging perfume of this “code of conduct.”*
- *First, I am against the formation of a police security organization on campus. I know that police do not prevent crimes, only respond to them. I know that increasing the number of guns on campus will absolutely increase the number of gun-related deaths. I know that policing disproportionately hurts people of color and other marginalized populations. I know that the best way to prevent crime is to invest in the community, reduce food insecurity, decriminalize drug use and destigmatize treatment, and reduce the number of weapons (including those carried by police) in the community.*

- *As a neighbor of Johns Hopkins Homewood campus residing in 21218, there is absolutely no need for a private police force. Baltimore spends the most money per capita on policing of any US city. We spend \$200 million more on policing than we do on education and \$300 million more than we do on health. I already cannot leave my neighborhood without seeing anywhere between 2 and 6 police cars within half a mile of my house. In addition, I usually see at least 1 Campus Safety vehicle in the area. If you would like to ensure the safety of your students, please continue to use non-police security measures. This city is begging you not to increase its policing and militarization. Please listen.*
- *After a number of protests specifically about the creation of the JHPD, it seems especially callous to go ahead with its formation anyway. I understand that the goal is student and staff safety, but more policing only increase arrests, it doesn't necessarily improve safety. In order to make communities safe, JH needs to invest in them, and improve access to food, housing, and fun, not police them. Moreover the draft policies seem to have the right ideas in mind for making this department as good as can be, so I encourage the department to transition away from policing and more towards aiding. For example, a Crisis Response Team is a better alternative used in a number of cities. Increasing the number of available EMTs and decreasing ambulance response time will help those in need even more. Police Johns Hopkins really wants to introduce a 'reformed' police department, then they need not introduce one at all; create something better. Thank you for soliciting feedback, and I hope you can find another way forward.*

Several comments expressed concerns about the potential increased risk for more gun-related violence due to the presence of officers with firearms.

- *No firearms or projectile weapons of any kind should be permitted for use for any reason. Remove all firearm permissions for campus security or JHPD.*
- *I am profoundly troubled by the prospect of a semi-automatic weapon being allowed anywhere on or near our campuses, in the hands of police officers or anyone else. I do not believe that the risk of armed assailants calls for the presence of even more weapons, especially semi-automatic weapons. Hopkins should not be introducing more guns into our campus and community. A simple Google search confirms that the "good guy with a gun" myth is just that, whether that gun is in the hands of a civilian or a law enforcement officer. I do not believe that this patrol rifle should be stored or carried by a Johns Hopkins Police Department.*
- *Point blank, this is an awful idea. Police brutality is an ongoing and rapidly intensifying issue in the US and many students, especially a campus where most students are minorities, are uncomfortable with police on campus. Leave the responsibilities of the police to the actual city police force.*

Another concern expressed by several community members was that the establishment of the JHPD could potentially have a detrimental impact on the City of Baltimore by drawing qualified officers away from the BPD, whether in the first instance or via lateral hiring.

- *I'd like to understand if there is parity between JHU police force's salaries and the Baltimore Police Department's salaries. Since JHU salaries typically outpace those of civil servants, I worry that we may cannibalize the BPD.*
- *While I appreciate the attention to detail and best practices when drafting these policies, I still think that adding a Johns Hopkins Police Department is unfair to the rest of the city, and undermines the Baltimore Police Department. Although JHPD will not actively poach BPD members, it will hire some current members which will increase the burden on an already understaffed and overworked department. As seen in the news, BPD doesn't have the greatest track record and taking away it's best members will ultimately lead to a decrease in effectiveness and a decrease in overall quality. Johns Hopkins resources would be better spend aiding BPD and working to improve the quality of policing done throughout the city as a whole. Not only would this benefit the University, but the Medical System too, and anyone else not on campus. Johns Hopkins is a part of Baltimore City, and should work to improve the city in all areas, not just around Hopkins campuses.*

Finally, of the total number of individual comments received, 105 were submitted in response to 23 policies with identical language that was specifically related to recommendations for any of those draft policies. The language of this comment is as follows:

- *Johns Hopkins wants us to believe they can create the first ever "accountable" police force, something that has never existed in over 100 years of attempted reforms. I will continue to oppose Johns Hopkins private police every step of the way. I am demanding a response to each of the following points:*
 - 1) *During the Garland Hall Sit-in in 2019, Tawanda Jones, who is a local activist with West Wednesday, was personally threatened by President Daniels' personal lawyers while on campus. Bard has refused to comment on the open investigation into these threats. I demand a public and written update on the ongoing investigation.*
 - 2) *There are several ongoing investigations into abuses of power and violence committed by Johns Hopkins security officers on Homewood campus. Before addressing policies for JHPD we need transparency about the policies and open investigations surrounding the existing campus security. Several videos were submitted of officers detaining or assaulting students. Racist social media posts inciting violence were made by officers Benjamin Held and John Horne, which were documented and submitted to the appropriate channels. We were told that*

these officers are no longer employed by the university, but we don't know if Johns Hopkins fired these officers. Without fail, students receive emails about every property crime that occurs within miles of the campus, but not a single email was sent to warn students about these officers, or the ones who assaulted or detained students. I demand a public statement and university-wide email be sent detailing policies for JHU security, updates on these ongoing investigations, and what measures are being taken to root out white supremacy within the existing campus security before even considering policies for armed private police.

3) Johns Hopkins is actively participating in Israel's ongoing genocide of Palestinians through its ties with weapons manufacturers like Lockheed Martin, Northrop Grumman, Raytheon, Boeing, and others. I demand Johns Hopkins cut all ties with weapons manufacturers arming the genocide of Palestinians and end their participation in DARPA's OFFSET program for making better drone technology for killing Palestinians.

4) Johns Hopkins has a 6 billion dollar endowment and has spent millions lobbying for their interests such as private police. I demand that Johns Hopkins use their lobbying resources to instead call for an immediate ceasefire and an end to Israel's genocide of Palestinians and US funding for Israel.

5) A patient in the Emergency Department died at the Johns Hopkins Hospital after suffering a cervical spinal cord injury while under the observation of two Johns Hopkins security guards. The death was ruled a homicide, and it bears a striking resemblance to the police killing of Freddie Gray. While this incident happened in January, the media only broke the story around two weeks ago. Bard, who likes to boast about transparency, has still not released a statement about this homicide at the Johns Hopkins Hospital. I demand the university make a public statement and send out a university-wide email detailing the homicide as well as established policies for JHU security officers at the hospital, and addressing why this story was covered up for 10 months.

I trust all of these points will make it into 21CP Solutions' report on submitted feedback.

VII. CONCLUSION

JHPD posted draft policies for public feedback between September 2023 and January 2024 after an extensive internal policy development process that incorporated best practices and tailored policies to Johns Hopkins' public safety needs.

Since the conclusion of the public input and feedback process, the policy development team for JHPD has reviewed, considered, and revised the initial draft policies. These revisions are documented in the *Community Feedback on the Johns Hopkins Police Department Draft Policies - Disposition Report* and will be reflected in the finalized, approved, and publicly posted JHPD policies. These policies and the future operations of the JHPD undoubtedly will be better because of the public's thoughtful participation in the policy feedback process. In addition to the invaluable feedback on specific policies, JHPD leadership also received several questions and public feedback about the JHPD and its future operations, which 21CP encourages JHPD leadership to use to inform the continued implementation of the JHPD.

In their finished form, JHPD policies will serve as the foundation for the agency, a focal point for the training that all JHPD officers will receive, and the standard by which all conduct by the JHPD will be measured. However, **the policy development and refinement process to ensure alignment with community needs is an ongoing task.** Notably, under Policy #202 Written Directive System, when JHPD updates policies moving forward, a similar public comment period (30 days) and Accountability Board review will occur before the revised versions of the policies are finalized and published.

Furthermore, JHPD's continued implementation and future operations must ensure that the strong policy foundation is reinforced by other essential components of a highly effective law enforcement agency. This includes training officers on the content of policies and the reasoning behind how these policies were developed and customized to JHPD. First-line supervisors can strongly influence their subordinate officers' compliance with policy and training by modeling behavior and setting priorities and expectations that align with JHPD policy.³⁸ Similarly, JHPD command staff personnel must ensure that the department's accountability infrastructure rewards adherence to policies and training and holds accountable officers if their conduct does not conform to these policies.

21CP is encouraged by JHPD's plan for a phased implementation of operational services over the next three years. This approach demonstrates great respect for the significant planning and assessment each phase will require. Especially given the scope of activities and requirements that

³⁸ Engel, R.S., Isaza, G.T., Motz, R.T., McManus, H.D., & Corsaro, N., "De-escalation training receptivity and first-line police supervision: Findings from the Louisville Metro Police Study." *Police Quarterly* 25, no. 2 (2022): 201-227; Haas, N.E., Van Craen, M., Skogan, W.G., & Fleitas, D.M., "Explaining officer compliance: The importance of procedural justice and trust inside a police organization." *Criminology & Criminal Justice* 15.4 (2015): 442-463.

are implicated in establishing policing services, this kind of structured, strategic, and phased approach helps to ensure that the JHPD ultimately functions in a manner consistent with the goals, values, and interests of Johns Hopkins and the greater Baltimore communities of which the University and Health system are a part. Establishing JHPD will not be a matter of “flipping a light switch on”—instead, it will be a gradual, phased approach to scaling the Department to its full form.

