

Community Feedback on the Johns Hopkins Police Department (JHPD) Draft Policies

DISPOSITION REPORT

From September 2023 through January 2024, Johns Hopkins University (the “University”) sought input from the community on draft policies that will guide the day-to-day work of the Johns Hopkins Police Department (“JHPD”). Two public comment periods were opened: the first, a 90-day period that concluded December 20, 2023; the second, a 60-day period that concluded January 29, 2024.

As part of the University’s commitment to a transparent, community-driven process, the JHPD policy development team reviewed every comment submitted during those open periods, using community guidance to enhance our policies where relevant and appropriate.

The University and JHPD are committed to improving our policies continuously. We are dedicated to implementing policies that align with the concerns and views of our community members, and we will continue to review and update our policies in the future to ensure we remain at the forefront of positive, community-informed policing.

This Disposition Report lists the feedback submitted – more than 800 unique comments and questions – during the two public comment periods and notes how the input has been addressed in the final policies. The feedback herein is presented verbatim and is organized into two sections:

1. Policy Manual Recommendations:

Specific questions, comments, and recommendations related to the JHPD Policy Manual

2. General Questions and Feedback

Overarching feedback on the JHPD or the draft policies

Due to extensive changes from incorporating community feedback and copy-editing, referenced content may no longer be the same as compared to initial draft policies. Dispositions note the current location of content referenced by comments to ensure ease of reference. In addition, the cover memorandums that prefaced each draft policy, which provided background context for the public as they reviewed them, have since been removed to improve readability.

KEY

No Actionable Recommendation: No change was made to the policy, as the comment does not provide applicable feedback. A disposition response is not given.

Original Language Retained: No change was made to the policy, but a disposition response is given.

Reflected: The intent of the comment is addressed elsewhere in the policy or within the JHPD Policy Manual.

Adopted: A change was made to the policy, or elsewhere within the JHPD Policy Manual, to reflect the intent of the comment.

Policy Manual Recommendations

The University committed to adopting, incorporating, or otherwise reflecting in the final JHPD policies recommended changes and feedback aligned with the University’s values and commitments, permissible within legal parameters, and supported by national best practices for community policing and public safety.

This section lists comments focused specifically on the draft policies. Comments and their dispositions are listed numerically by policy, with the exception of selected comments categorized as Global, due to having application in multiple areas of the JHPD Policy Manual.

Some comments were submitted as in-line edits to the draft policies. These comments are addressed in the Policy Manual Recommendations section. However, for readability and brevity, the referenced draft policy text is not included. The right-hand column describes how each comment is addressed in the draft policies or other aspects of its implementation.

Policy Number and Title	Comment	Disposition
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.	Adopted: Addressed in Policy Enforcement.
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.	Adopted: Addressed in Vision and Mission statement.
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.	Adopted: Addressed in Guiding Principles.
101 Vision, Mission & Guiding Principles	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.	Adopted: Addressed in Guiding Principles.

Policy Number and Title	Comment	Disposition
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.	Adopted: Addressed in Guiding Principles.
101 Vision, Mission & Guiding Principles	All this looks great. Just one comment. For this statement: We provide relief to the people and situations we encounter in a campus environment. I think perhaps "support" may be clearer than the word relief?	Original Language Retained: The term "relief" was chosen based on Johns Hopkins' commitment to harm reduction strategies.
101 Vision, Mission & Guiding Principles	This is literally part of the job of being law enforcement.	Adopted: Addressed in Guiding Principles.
101 Vision, Mission & Guiding Principles	If this is for all members, then it is not following chain of command.	Adopted: Addressed in Policy Enforcement: Reporting Violations.
101 Vision, Mission & Guiding Principles	The "Vision Statement" is not a vision statement. A vision statement is where the organization is going and what the long-term goals are for the organization. As this vision statement stands, it is more of a mission statement since it states what the organization is doing right now. The "Service" statement is reaching, and it is recommended that it is redeveloped since law enforcement, especially in recent years, is not an agency that is recognized to be providing "relief to the people." In addition, law enforcement is the enforcement of laws and that should not be discredited in the statement. The "Justice" statement should be an acknowledgement to 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 nor intertwined. The "Integrity", "Diversity", and "Equity" statements are weak considering the importance and weight they carry. This was a severe disappointment as it is one of the most important points for any institution, including law enforcement.	Adopted: Addressed in Vision Statement and Guiding Principles.
101 Vision, Mission & Guiding Principles	This is not a vision statement. A vision state is where the organization is going and what the long term goals are for the organization. This is a mission statement since it states what the organization is claiming to do right now.	Adopted: Addressed in Vision Statement.

Policy Number and Title	Comment	Disposition
101 Vision, Mission & Guiding Principles	These principles make no mention of upholding the law and Constitutional rights of those their members come across. I'm extremely concerned since these principles are all about legitimizing JHPD in the minds of everyone around them and not about law enforcement.	Adopted: Addressed in Guiding Principles.
101 Vision, Mission & Guiding Principles	JH is not a justice institution and this statement fails to acknowledge the racist, sexist, and homophobic past that the institution has with marginalized communities.	Adopted: Addressed in Guiding Principles.
101 Vision, Mission & Guiding Principles	Whenever referencing their department, JH should capitalize it.	Original Language Retained: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
101 Vision, Mission & Guiding Principles	JH has "Policy" in the title, but then "...are governed by this Directive". Clearly unable to differentiate between the two.	Original Language Retained: The terms "directive" and "policy" are used interchangeably.
101 Vision, Mission & Guiding Principles	I'm not sure if it's listed or not. Can you confirm that in cases where members of the JHU community commit crimes, they will be investigated by an external police force? I am most interested that we have learned the lessons from the Jerry Sandusky scandal at Penn State, the UMass - Dartmouth sexual assault cover-up, and the Dartmouth University faculty rape scandal, i.e. that when a university police force investigates its own university's leaders and/or faculty and/or itself, it too often refuses to follow through adequately, or even goes as far as covering up crimes of those in authority, which results in harm to other members of the community and a lack of due process. In all three cases, university community members and/or neighbors were harmed because the university police force did not hand over investigations to impartial, external investigative offices. I hope that for any serious crime the JHU police force is required by its own policies to involve the relevant investigative police force, whether it be Baltimore City or County, Maryland State Police, the relevant DA, or even federal investigators if needed. University police forces do not report to a democratically elected leader, and are therefore much more likely to be corrupted as a result. I hope the JHU police force creates solid policies that avoid situations where it protects its bosses at the expense of protecting other members of the university community and neighbors.	Original Language Retained: In accordance with the Maryland Police Accountability Act of 2021, JHPD Directive #350, Complaints Against Police Personnel requires all complaints of police misconduct involving a member of the public be adjudicated by the Administrative Charging Committee for Baltimore City.

Policy Number and Title	Comment	Disposition
101 Vision, Mission & Guiding Principles	<p>Another 100 armed police at a couple of JHU campuses is not going to make everyone safer - it will help only a tiny amount. JHU should invest time and money to work to have Baltimore City add 1000 police on the streets, surrounding counties a similar +1000 police n the streets (in city ~600K, nearby another ~600K. Also need to reform and improve entire criminal justice system (City, neighboring counties, MD) to quickly (and fairly) deal with potential criminals. I do not see +100 armed JHU police, or my recommended additional +2000 regionally, as solving the routine lawlessness I see on and near the JHU East Baltimore campus (and also throughout Baltimore City, I-95 corridor, etc). Every day I see at the Wolfe & Orleans and Wolfe & Fayette intersections vehicles (1) speeding [when intersections are not jammed], and/or (2) running red lights. This puts pedestrians (me and others), bicyclists (few), scooters (more), and vehicles at risk for accidents. Armed JHU police are not going solve this campus lawlessness. I suggest JHU work with Baltimore City, neighboring counties, MD, and Ferderal government, to re-implement EZ-Pass (or equivalent system; ideally secure transponders integrated with license plates and newer vehicle GPSs and drivers smartphone GPSs) for local traffic control. JHU could start by funding sensors (and license plate cameras) on and near all our campuses (start with Homewood, East Baltimore, then Bayview). This would require changes in laws such that every vehicle on public roads in MD has "EZ-Pass-like" transponders (out of state drivers would need the same system). Also local schools (ex. extend past Dunbar high school). An additional high priority would be interstate construction sites - re the 6 deaths earlier this year on I-695 due to two cars racing. Readers on each end of a constuction zone can record every vehicle, and fines can be issued (and texted and emailed to the driver and owner and insurance company). EZ-Pass-like plus (modern) vehicle GPS plus license plate readers would also de-chaos (i) car thefts and carjackings, and (ii) tail gating. When I drive on I-95 I am frequently tail gated by mega-SUVs, mega-pickup trucks and occasionally tractor-trailers. These drviers are both behaving unsafely and are doing this to intimidate drivers -- a form of bullying that should be fined to the point of ending the behavior.</p>	<p>Original Language Retained: Per JHPD Directive #442, Traffic Control & Enforcement, the JHPD's traffic enforcement efforts will be focused on moving traffic law violations or locations that present public safety related concerns.</p>
101 Vision, Mission & Guiding Principles	<p>Thank you for the opportunity to submit comments. This is a big picture comment. 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 the 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.</p>	<p>Adopted: Addressed in JHPD Directive #411, Search & Seizure Procedure XVIII (H), and JHPD Directive #424, Arrests & Alternatives to Arrest Procedure I (G)(H), IV (C)(E).</p>

Policy Number and Title	Comment	Disposition
101 Vision, Mission & Guiding Principles	<p>Thank you for the opportunity to submit comments. This is a big picture comment. 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.</p>	<p>Reflected: JHPD Directive #210, Records Management, details what information JHPD will make publicly available.</p>
101 Vision, Mission & Guiding Principles	<p>Thank you for the opportunity to submit comments. This is a big picture comment. Given the extensive number of policies, there may be questions about how the JHPD can be sure its officers are aware of the policies.</p> <p>The JHPD should consider developing policy on how people will be trained and assessed on their knowledge of the policies.</p>	<p>Reflected: JHPD Directive #305, Training & Professional Development, explains JHPD officer training and assessments.</p>
101 Vision, Mission & Guiding Principles	<p>Thank you for the opportunity to submit comments. This is a big picture comment related to data analysis and research. 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 gender ... or 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.</p>	<p>Reflected: Data driven policies are included throughout the JHPD Policy Manual. Additionally, JHPD is working to develop a contact data-reporting and analysis program, which will result in an associated directive.</p>
101 Vision, Mission & Guiding Principles	<p>2. Whether these policy documents help “JHPD safely carry out its stated mission” is unknown. I think that ultimately what will matter most is the leadership’s ability to institutionalize, routinize, and incentivize the vision in these documents. It’s one thing to write on paper these aspirations, norms and rules. It’s a very different thing to ensure they are implemented in a consistent and comprehensive manner in the field. No one could possibly remember all the bullet points in these documents and it’s quixotic to ask officers to remember, for example, the roughly two dozen actions that are listed as being elements of procedural justice. How will you ensure that the principles and specifics in these documents are persistently implemented by the force? How will you make it cognitively easier for officers to remember what they’re supposed to do in a particular situation? How will you ensure that they perceive they will be rewarded for doing what they’re supposed to do? One of the biggest problems in effective policing is misaligned incentives.</p>	<p>Reflected: JHPD Directives #301, Personnel Management; #305, Training & Professional Development; #306, Field Training & Evaluation Program; #312, Awards; and #355, Early Intervention Program, explain JHPD officer training, assessment, supervision, and awards.</p>

Policy Number and Title	Comment	Disposition
101 Vision, Mission & Guiding Principles	<p>3. Yes, the policies are consistent with the values and needs of the community. Yes, they are understandable (if a little repetitive and long-winded in places). I don't see major gaps for a policy document. I guess the most challenging part of this enterprise will be "how will you know you've achieved your goals or how far you are from achieving them?" For example, who is the "public" that must perceive the force's fidelity to "procedural justice"? The individual detained or questioned, an evaluative panel, people who submit comments and complaints, or someone else? How will their opinions and perceptions be ascertained?</p>	<p>Reflected: JHPD Directive #425, Community Policing & Problem Solving, details JHPD methods for assessing the success of our problem-oriented community relief efforts.</p>
101 Vision, Mission & Guiding Principles	<p>I think this is very good. I think on the Campus I would clearly post those laws that will be enforced per the University. These specific laws should be those of the University therefore they have not been made up or added by the police. Off Campus I think people will have to follow the laws of Baltimore City and there police department. I really don't think this will be hard. I would run down a plan for live shooters on the Campus. Hopefully this will never be needed, A plan that shows you'll approach and the expected protocols for notifying the students on campus.</p>	<p>Reflected: JHPD Directives #424, Arrests & Alternatives to Arrest, outlines JHPDs, differentiated, least intrusive, and most appropriate enforcement response to criminal and civil offenses. JHPD Directive #201, Authority, Department Organization & Command outlines JHPD jurisdiction and the general authority, duties, and responsibilities of its officers. JHPD Directive #481, Active Assailant Response, provides plans and protocols for JHPD response to active assailants on campus. JHPD Directive #222, Clery Act Compliance, details procedures for timely warnings regarding threats to the campus community.</p>
101 Vision, Mission & Guiding Principles	<p>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. 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. 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.</p>	<p>Original Language Retained: Each agency is subject to it's own policies, procedures, and guidelines.</p>

Policy Number and Title	Comment	Disposition
101 Vision, Mission & Guiding Principles	<p>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 Guantanamo Bay, 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.</p>	<p>Adopted: Addressed in Guiding Principles VI. Additionally, JHPD Directive #106, Fair & Impartial Policing Procedures V (A), details training requirements on bias-based or discriminatory policing.</p>
101 Vision, Mission & Guiding Principles	<p>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.</p>	<p>Reflected: JHPD Directive #301: Personnel Management Procedure VI and XIV detail methods for regulating over-time and ensuring officer wellness.</p>
101 Vision, Mission & Guiding Principles	<p>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. It's helpful to have some trained peer support in the department to ensure the officers' mental health is a priority.</p>	<p>Reflected: JHPD Directive #301, Personnel Management, Procedures XV, details significant incident stress de-briefing and evaluation procedures.</p>

Policy Number and Title	Comment	Disposition
101 Vision, Mission & Guiding Principles	<p>Dr. Bard, I'm writing in my official capacity as [REDACTED]. Johns Hopkins Public Safety released a subset of its policies in draft form for public comment. Members of the [REDACTED] community have begun to examine the policies with an eye towards providing feedback. We note however that the subset provided is incomplete. Can you let us know when the full set will be available? Are we correct in assuming that the sixty days for public comment will be counted from the release of that full set?</p>	<p>Reflected: The release of the final JHPD Policy Manual serves to meet the initial Commission on Accreditation for Law Enforcement Agencies law enforcement accreditation standards. The JHPD Policy Manual will be reviewed and updated regularly to ensure that it is in compliance with updates to law, regulations, accreditation standards, or changes in best practices. All newly developed JHPD policies will follow the same period for public review if or when they are created.</p> <p>In order to ensure adequate room in the JHPD Policy Manual to accommodate the additional standards or to achieve advanced and dual accreditation, the JHPD Policy Manual strategically reserves policy numbers throughout to expand topics into separate directives and to add additional topics, when necessary, to meet the additional standards required for dual and advanced accreditation.</p> <p>At this time, all policies have been posted publicly in draft form and the public has had more than sixty days to review them.</p>
101 Vision, Mission & Guiding Principles	<p>I live one block away from the Homewood campus and STRONGLY OPPOSE the proposal to have campus police carry rifles. I'm disgusted by the idea of armed riflemen in my neighborhood. This proposal won't prevent muggings and other crimes, they'll only increase the chance of escalation and police violence. Horrible! The force shouldn't have rifles at all.</p>	<p>Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
101 Vision, Mission & Guiding Principles	<p>Accountability is notably laid out as a requirement for the public to enforce through e.g. public recording of police, undertaken at one's own risk that JHPD members will obey law and policy. When someone has a gun or less-lethal (but still commonly lethal) weapon, you cannot leave accountability up to "we hope they follow the policy, and if they don't, we hope someone records it." JHPD officers should be unarmed and trained in de-escalation, with the ability to call for armed backup only if necessary. Any such call should be rigorously reviewed by an independent panel with investigatory powers, regardless of the outcome of the call. Only then would campus members and affiliates feel relatively safe around JHPD.</p>	<p>Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
102 Professional Ethics	<p>Code of ethics bullet A should be revised as follows: As a law enforcement officer, my fundamental duties are to serve the community; to safeguard lives; to protect the innocent against deception, the weak against oppression or intimidation; and to respect the constitutional rights of all to liberty, equality and justice.</p>	<p>Adopted: Addressed in Procedures II (A).</p>
102 Professional Ethics	<p>Code of ethics</p> <p>Bullet C should be additionally revised to not claim that all police officers will "permit personal feelings, prejudices, political beliefs, aspirations, animosities or friendships to influence my decisions" and instead should emphasize that all officers will undertake continuous anti-racism as part of their duty.</p>	<p>Adopted: Addressed in Procedures II (C).</p>

Policy Number and Title	Comment	Disposition
102 Professional Ethics	Does "I will keep my private life unsullied..." in any way place unnecessary restrictions on the behavior of the officers? Its the definition of "unsullied" sufficiently objective to make this clear?	Adopted: Addressed in Procedures II (B).
102 Professional Ethics	<p>In section IV, it states "all members of the JHPD will receive 'ongoing and initial ethics training'".</p> <p>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?</p> <p>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.</p> <p>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.</p>	Original Language Retained: Lesson plans will be created in accordance with JHPD Directive #305, Training & Professional Development.
102 Professional Ethics	My only comment is that the policy doesn't appear to spell out what the consequences for not following it will be	Reflected: Violations of JHPD Directives are addressed in accordance with JHPD Directive #350, Complaints Against Police Personnel.
102 Professional Ethics	Since JHPD will be employing a variety of positions that would be considered civilian positions, a Civilian Member Code of Ethics should be developed like what BPD has in their Code of Ethics, Policy 301.	Adopted: Addressed in Procedures IV.
103 Rules of Conduct	In what circumstances would this occur?	No Actionable Recommendation.
103 Rules of Conduct	a) Tobacco, Alcohol and Gambling Restrictions: As the section also deals with illicit Drugs, should it be called "Drug, Tobacco, Alcohol and Gambling Restrictions "	Adopted: Addressed in Rules and Regulations VIII.
103 Rules of Conduct	b) As use of Steroids &/or other performance enhancing drugs by Law Enforcement officers (I strongly believe) can lead to aggressive behavior in the field, I believe adding specific restrictions on this may be considered.	Adopted: Addressed in Rules and Regulations VIII (L).
103 Rules of Conduct	This should be changed to be "no member shall save..." since other policies under XII. JHPD Records start with "No member..".	Adopted: Addressed in Rules & Regulations XI (D).

Policy Number and Title	Comment	Disposition
103 Rules of Conduct	Thank you for the opportunity to submit comments. Page 8. Should refer to "misuse" of prescription drugs, not "abuse." Abuse is a stigmatizing and unnecessary word and its use is disfavored. See: https://obamawhitehouse.archives.gov/blog/2017/01/13/changing-language-addiction	Adopted: Addressed in Rules & Regulations VIII (C).
103 Rules of Conduct	Should link to JHU's Discrimination and Harassment Policy and Procedures page. https://oie.jhu.edu/policies-and-laws/discrimination-andharassment-policy-and-procedures-dhpp/	Adopted: Addressed in Related Resources.
103 Rules of Conduct	V. Professionalism - D. This is the same as "B."	Adopted: Addressed in Rules & Regulations V (B).
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 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?	Adopted: Removed section. Policies regarding extrajurisdictional action are included in JHPD Directive #201, Authority, Department Organization & Command, Procedures II.
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)	Reflected: JHPD Directive #412, Custody, Transport and Processing, Procedures II (D) and V (A), detail police interactions with individuals with disabilities.
103 Rules of Conduct	A proper Authority statement would include citing the Code. The Community Safety and Strengthening Act, Md. Code Ann., Education § 24-1202 authorizes Johns Hopkins the authority to establish a police department.	Adopted: Addressed in Rules and Regulations I.
103 Rules of Conduct	"Values" aren't included in #101.	Adopted: Addressed in Rules and Regulations II.
103 Rules of Conduct	"Scheduled Substance" is not defined in the "Definitions" of the policy though is referenced several times.Under Rules and Regulations, I. Authority, a proper authority statement would include citing the code that provides the authority to the agency. Under Rules and Regulations, IX. Tobacco, Alcohol and Gambling Restrictions, C., "... The taking of any scheduled substance before or during working hours must be reported to their supervisor within two (2) hours of the start of the member's shift" is an ADA violation if they are being forced to provide specific details.	Adopted: Addressed in Rules and Regulations I, VIII (C), and X.

Policy Number and Title	Comment	Disposition
103 Rules of Conduct	If JH is wanting to be the "progressive leader in public safety" that they are claiming, they would forego this deeply flawed hierarchy model.	Adopted: Addressed in Rules and Regulations IV (B-D).
103 Rules of Conduct	Defining insubordination isn't necessary.	Adopted: Addressed in Rules and Regulations IV (B-D).
103 Rules of Conduct	Why was this separated from "A."? (BPD Policy 302, 1:1)	Adopted: Addressed in Rules and Regulations V (A).
103 Rules of Conduct	This link doesn't go to Sexual Misconduct Policy and Procedures.	Original Language Retained: The link connects to the Johns Hopkins University Office of Institutional Equity, which includes a page dedicated to Sexual Misconduct Policy and Procedures.
103 Rules of Conduct	These would all fall under the "unwillingness or inability to perform assigned tasks" and "the failure to conform to work standards established for the member's rank, grade and/or position". (Edited from BPD Policy 302,1:16-16.2)	Adopted: Addressed in title of VI.
103 Rules of Conduct	This can be a slippery slope.	Adopted: Addressed in Rules and Regulations VIII (C).
103 Rules of Conduct	"Scheduled substance" is not defined in this "directive", so as it stands, this is an ADA violation.	Adopted: Addressed in Rules and Regulations VIII (C).
103 Rules of Conduct	Wouldn't "Johns Hopkins" include JHPD?	Adopted: Addressed in Rules and Regulations VIII (I).
103 Rules of Conduct	Why is there a listing of why someone could take time away from work?	Adopted: Addressed in Rules and Regulations IX (A).
103 Rules of Conduct	Are there links to these policies and procedures?	Adopted: Addressed in Rules and Regulations IX (A).
103 Rules of Conduct	This sentence was omitted when adopted from BPD Policy 302, 5:3. "Prior to taking a leave of absence, members will notify their Commanding Officers as to how they may be contacted while on leave."	Adopted: Addressed in Rules and Regulations IX (C).
103 Rules of Conduct	Shouldn't this be the ADA link? JHU's ADA Compliance and Disability Accommodations	Adopted: Addressed in Rules and Regulations IX (E).
103 Rules of Conduct	There should be policy that no member is permitted to release any information about the Department and any activities its participating in except on the authority of the CoP.	Adopted: Addressed in Rules and Regulations X (E).

Policy Number and Title	Comment	Disposition
103 Rules of Conduct	Local institutions, including Morgan State University and Towson University, do not have policies dictating what members may do while off-duty and not in uniform.	Original Language Retained: Most police agencies have rules and regulations regarding off duty conduct, especially forms of conduct that could bring discredit to the agency or affect an officer's credibility or ability to perform the essential functions of their job.
103 Rules of Conduct	JHPD should consider drafting an internal investigations policy, then having it noted here.	Adopted: Addressed in Rules and Regulations XII (B).
103 Rules of Conduct	There needs to be a policy under Rules and Regulations, XI. Reports & Communications stating that no member is permitted to release any information about the Department and any activities it is participating in except under the authority of the Chief of Police.	Adopted: Addressed in Procedure X (E).
103 Rules of Conduct	Belongs under Rules of Conduct, V. Professionalism.	Original Language Retained: This provision is related to Rules and Regulations XII: Investigation and Reporting of Misconduct.
103 Rules of Conduct	Rules of Conduct seem exclusively taken from CALEA as a source, and does not include ACLU recommendations or guidelines, including JHUPD performance metrics based on community engagement and limited off-duty engagement of officers. Given the already robust presence of BPD in JHU areas, consider eliminating section about off-duty responsibilities and emphasize that officers should not be engaging in policing when off-duty (even when exercising discretion).	Adopted: Addressed in Rules and Regulations and reflected in JHPD Directive #201, Authority, Department Organization & Command.
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.	Reflected: JHPD Directive #350, Complaints Against Police Personnel, details policies and procedures for misconduct investigations.
103 Rules of Conduct	While I understand the reason for IX.d, who is the judge of what is "obnoxious or offensive behavior which would discredit themselves, the JHPD and JHU..." Can discredit be made any clearer?	Adopted: Removed from Rules and Regulations VIII (D).
103 Rules of Conduct	The officers should not have firearms on duty. They should be equipped with tazers, pepper spray and batons. They have more than enough capacity to deal with violent offenders in this regard, with the exception of criminals with guns. In that case, they should explicitly NOT engage, and should defer to the Baltimore Police Department.	Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.

Policy Number and Title	Comment	Disposition
104 Personal Appearance	<p>I find this challenging to enforce, "Members may wear eyeglasses and sunglasses if the frames are consistent with a modern professional appearance." I'm not sure where I would draw the line on what is a modern professional experience. Are there certain colors that would not be professional? Would my yellow reading glasses be considered professional? Is there anything either more inclusive or more directive that would be acceptable but allow for diversity?</p>	Adopted: Addressed throughout JHPD Directive #104, Personal Appearance.
105 Personal Use of Social Media & Electronic Devices	<p>The policy clearly infringes upon the basic free speech of JHPD. It prohibits members from "Mak[ing], shar[ing], or comment[ing] in support of any posting disparaging of any race, religion, sex, gender, sexual orientation, nationality, or any other protected class of persons." Except "disparaging" is, as far as I could find, not defined in the policy document. Given that different individuals will have different ideas on what "disparaging" is, this policy could (for example) easily get a JHPD member fired for liking a Twitter post arguing that Christian beliefs are illogical (disparaging against religion), or liking a Facebook post that claims food made by people from Thailand is better than food made by people from France (disparaging against French nationality). JHU should at least provide a definition for disparaging, although ideally JHU would remove the section on disparaging entirely, because any attempt to define disparaging is still bound to be weaponized against opinions. This is problematic not just from a free speech standpoint, but also from the standpoint of needing to recruit: job candidates will not want to work for an employer that threatens to fire them for mundane social media activity done in private off the clock.</p>	Original Language Retained: This provision is in line with best practices of other law enforcement agencies.
106 Fair & Impartial Policing	<p>Note for me to check: Has JH released an org. chart with the positions yet? (Curious)</p>	No Actionable Recommendation.
106 Fair & Impartial Policing	<p>Happy to see this in here!</p>	No Actionable Recommendation.
106 Fair & Impartial Policing	<p>a) Definition of Reasonable Articulate Suspicion (RAS) allows for pat-downs based on the perception that a person is armed. Board should discuss whether this is too subjective/should include a more evidence-based clause regarding presence of weapons.</p>	Reflected: This issue is addressed in JHPD Directive #409, Field Interviews, Investigative Stops & Pat-Downs.

Policy Number and Title	Comment	Disposition
106 Fair & Impartial Policing	<p>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.</p>	<p>Reflected: JHPD Directive #415, Individuals With Behavioral Health Conditions, details resources and training related to responses to individuals in crisis.</p>
106 Fair & Impartial Policing	<p>This is not how you cite the Code.</p>	<p>Original Language Retained: In the JHPD directives, the Maryland Code is consistently referred to as the "MD Code," instead of the full legal format cited, "Md. Code Ann." The stylistic choice was to use "MD Code" for ease of use and reading. This is also a format commonly used by Westlaw. A provision has been included in JHPD Directive #202, Written Directive System, explaining that the Maryland Annotated Code is referred to as "MD Code."</p>
106 Fair & Impartial Policing	<p>I do not support the creation of the JHPD. However, as an affiliate of the university, I will provide feedback to try to mitigate the harm the creation of the JHPD will do. Within this policy under heading II. Constitutional Policing section B, the last point reads "Callers or other persons providing information to the JHPD may be asked to elaborate on terms like "acting suspiciously" to enable JHPD members to more accurately determine what, if any, police response is required." This is not strong enough language and leaves far too much up for interpretation. To better protect affiliates and the community members, I believe all persons reporting must provide reasonable and articulable cause. It should say "... providing information to the JHPD will be asked..." and this cause should be quoted in the report, if any action is taken. This will ensure consistency with the policy that the reason for instigating an interaction is articulable. Furthermore, more terms beside "acting suspiciously" are used to wrongly subject people to police encounters. Therefore, more terms and examples should be included here to provide less room for misinterpretation</p>	<p>Adopted: Addressed in Procedures II (B).</p>

Policy Number and Title	Comment	Disposition
106 Fair & Impartial Policing	<p>Pg. 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:</p> <p>Before an officer gap encounter with an individual, the officer should consider the following:</p> <ul style="list-style-type: none"> 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? d. Are other individuals in the immediate vicinity exhibiting those same behaviors such that the behaviors are indicative not of crime but of a shared activity, e.g., dancing, or of a community norm? 	Adopted: Addressed in Procedures II (C).
106 Fair & Impartial Policing	<p>106, pg. 3 (Fair and Impartial Policing): Policy The JHPD prohibits bias and discrimination, requires professional police interactions, and ensures that all members base their behavior and all enforcement actions on sound legal reason, to include ensuring that investigative stops and detentions, traffic stops, interviews and/or interrogations, arrests and citations, searches, uses of force, and asset seizure are consistent with Maryland Statutes and the Fourth Amendment of the U.S. Constitution. Needs review by a lawyer. Somewhere in these policies there needs to be something about using language line or similar for non-English speaking interactions - not sure if it belongs here or elsewhere.</p>	Adopted: Addressed in Procedures I (A).
106 Fair & Impartial Policing	<p>In section I, it states: "If a person states that they would like to speak with a supervisor, make a complaint, and/or they refuse to accept a JHPD member's explanation about the encounter, the member shall request a supervisor to allow individuals to voice their concern related to the contact and shall explain the compliant process to the person".</p> <p>There are so many non-police organizations that could be partners. Social Workers, members of the community who have adequate training on mental health, members who live in the community and want to strengthen the relationship and trust that people do not have in BPD and JHPD.</p>	Adopted: Addressed in Procedures I (A).

Policy Number and Title	Comment	Disposition
	<p>There are a lot of people in the community and in Hopkins who have (and continue to have) non-affirming, dangerous, and traumatic instances with the police. Having a non-police member present could help community members feel SAFE and HEARD. Having another police officer come to "explain the compliant process to the person" is not an adequate response to the very real concerns of the people of this community regarding the earned distrust of police, let alone a police force for an institution that clearly does not respect them, but rather views as a liability.</p> <p>This policy in particular highlights the fear that I have about the intention of this police force. It seems as though there will be no real sense of accountability for this force and all of the members that serve it.</p>	
106 Fair & Impartial Policing	<p>While the intent to prevent the worst outcome (black-targeted harassment) is evident in the writing, the language is so vague that this sort of targeting can still be justified using hand-wavy justifications. For example, an officer may explain that a suspect has a known skin color, and that's why a random stop was conducted, and from here abusive behavior can occur. Explicit language in this document (106) describing specific scenarios and resulting unallowable or allowable actions would make it much easier for police to be held accountable to their own governing documents. In other words, more specifics, less room for interpretation, less wiggle room for scared police officers working on poor judgement.</p>	<p>Adopted: Addressed in Procedures II (C).</p>
106 Fair & Impartial Policing	<p>This is Discriminatory Policing and it came from BPD Policy 317, Definitions. Bias-based policing used to be known as racial profiling, but it covers biases that one would only know by looking at an individual. Whereas discriminatory covers things that may be learned through further conversation, such as immigration status, language ability, HIV status, mental illness, political ideology, and addiction. This should be changed back to be Discriminatory Policing and redrafted with that update.</p>	<p>Adopted: Addressed in Definitions.</p>
106 Fair & Impartial Policing	<p>Most of "A." is from BPD Policy 317, Fair and Impartial Policing. If JH is going to include this, then they need to define "investigative stop" and "vehicle stop", as BPD has in their policy.</p>	<p>Adopted: Addressed in Definitions.</p>
106 Fair & Impartial Policing	<p>There's no mention of "Whren" stops in the entire policy which is an essential case in impartial policing concerning traffic stops.</p>	<p>Original Language Retained: Pretextual stops are prohibited except for rare instances where there is a serious offense involving an immediate threat to the public's safety. See JHPD Directive #409, Field Interviews, Investigative Stops & Pat-Downs, and #442, Traffic Control & Enforcement.</p>

Policy Number and Title	Comment	Disposition
106 Fair & Impartial Policing	"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. Whereas discriminatory policing covers things that may be learned through further conversations, such as immigration status, language ability, and everything else currently listed under 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?	Adopted: Addressed in Definitions and throughout - now reads "bias-based or discriminatory policing."
106 Fair & Impartial Policing	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.	Adopted: Addressed in Definitions and throughout - now reads "bias-based or discriminatory policing."
106 Fair & Impartial Policing	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.	Original Language Retained: The JHPD Policy Manual, in its entirety, exceeds the constitutional minimum requirements in most instances and requires that all officers shall engage in law enforcement actions in accordance with federal, state, and local law.
106 Fair & Impartial Policing	The way that this is worded makes it sound like the only reason that JH is practicing fair and impartial policing is to gain the trust of the public. That can't be the only reason...	Adopted: Addressed in Procedures - Introduction.
106 Fair & Impartial Policing	Per my favorite JHU Graduate professor, "Good policy is, 'as required'. Great policy is, 'pursuant to'. And don't forget to cite your sources."	Adopted: Addressed in Procedures II (A).
106 Fair & Impartial Policing	What an odd way to say the law.	Adopted: Addressed in Procedures V (A).
106 Fair & Impartial Policing	This is duplicative since the Department's mission was already cited.	Original Language Retained: Intentionally reiterating the mission of the department for emphasis.
106 Fair & Impartial Policing	This is not a principle. It is a policy.	Original Language Retained: Core Principles often reflect the fundamental values and guiding statements of an organization by incorporating policy and making them actionable and aligned with the over-arching goals.

Policy Number and Title	Comment	Disposition
106 Fair & Impartial Policing	This is also not a principle. It is a policy.	Original Language Retained: Core Principles often reflect the fundamental values and guiding statements of an organization by incorporating policy and making them actionable and aligned with the over-arching goals.
106 Fair & Impartial Policing	This policy is not about strengthening the relationship between the police and the community.	No Actionable Recommendation.
106 Fair & Impartial Policing	This is not a policy nor a directive. It is an explanation as to why someone should abide by the policies and directives.	Original Language Retained: Ensuring fair and impartial policing results in strengthened relationships with the community.
106 Fair & Impartial Policing	Really should be its own policy. Constitutional policing isn't just about fair and impartial policing.	Original Language Retained: The JHPD Policy Manual, in its entirety, exceeds the constitutional minimum requirements in most instances and requires that all officers shall engage in law enforcement actions in accordance with federal, state, and local law.
106 Fair & Impartial Policing	Do they mean a different "directive"?	Adopted: Addressed in Procedures V (A).
106 Fair & Impartial Policing	Officers should under go implicit bias training and implicit bias assessments once a year. Scores from the implicit bias assessments should be reported to the individual and their supervisor(s), as well as stored in a database that may be used for investigations in the future if relevant.	Adopted: Addressed in Procedures V (A).
106 Fair & Impartial Policing	<p>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?</p> <p>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?</p>	<p>Adopted: Addressed in Procedure VI. Additionally, JHPD Directive #350, Complaints Against Police Personnel, defines Public Safety Accountability Unit as:</p> <p>"An independent investigative unit of the Office of Hopkins Internal Audits that conducts investigations and assessments of incidents and complaints related to the use of force and misconduct."</p>

Policy Number and Title	Comment	Disposition
106 Fair & Impartial Policing	<p>The only thing I want to understand a little bit more about is the reasonable articulable suspicion section. How does one draw the line between a hunch, RAS, and probable cause? What is the consequence if an officer fails to inform the person that they are being recorded with a body-worn camera or if they do not want to answer questions? (I assume the person could just file a report) I feel like in some cases the Non-discrimination clause: "all members are prohibited from using, to any extent or degree, actual or perceived personal characteristics of an individual as a factor in conducting or justifying law enforcement actions, except as part of a reliable, trustworthy, timely, and specific individual physical description where that description includes other appropriate non-demographic identifying factors" would be hard to implement but that's that. Ultimately, it's a great policy and clearly states that biased/discriminatory policing is not Acceptable</p>	Adopted: Addressed in Procedures II (B)(C).
107 Interactions with LGBTQ+ Individuals	<p>Small Edits: 1) The memo The memo uses the term "transgendered persons" which is outdated and inaccurate. Please change to "transgender persons."</p>	Adopted: Addressed in Definitions and Procedures I (B). The cover memorandums that prefaced each draft policy, which provided background context for the public as they reviewed them, have since been removed to improve readability.
107 Interactions with LGBTQ+ Individuals	<p>Pg 4 definitions have some inaccuracies Sex assigned at birth or assigned sex is falling out of favor. As sex is not what is being assigned, since sex is actually based on chromosomes which are not actually looked at for the vast majority of people. The more accurate term here is Gender Assigned at Birth. AFAB and AMAB are common terms, which stand for Assigned Female at Birth, and Assigned Male at Birth. I'm not sure where the definition of sexual orientation was taken from, but its incorrect. Sexual orientation refers to sexual attraction orientation. Romantic orientation is actually a separate thing. As an example, someone can be heterosexual, but panromantic, meaning they can develop romantic feelings for anyone but are only sexually attracted to the opposite sex. Emotional feelings isnt really something I would include either, as non-romantic emotional feelings refer to platonic orientations.</p>	Adopted: Addressed in Definitions.
107 Interactions with LGBTQ+ Individuals	<p>Pg. 6 table of "outdated" terms has some inaccuracies. "Transgenderism" has never been an actual word or appropriate. The way to refer to such is that an individual "is transgender". I would caution on suggesting cross-dresser as an alternative to transvestite, as it is a bit more complex. Cross-dressing is a form of gender expression. However, it is important to distinguish between cross-dressing, drag, and identifying as transgender, as those are all distinct. The term cross-dresser is not appropriate when referring to drag performers or transgender individuals.</p>	Adopted: Addressed in Procedures I (A).

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	Pg.7-8, asking for pronouns when unsure. I would suggest that for a person in authority like a police officer, the SOP should be to introduce themselves first using pronouns to model acceptance and safety. Such as "I'm Officer Smith, I use he/him pronouns, what name and pronouns do you use?"	Adopted: Addressed in Procedures IV (B).
107 Interactions with LGBTQ+ Individuals	Pg. 8. people's names changing over time, I would change the phrasing to be something like "changes to reflect gender identity" as often, someone's gender identity does not change. Rather, they make their gender identity known and transition to reflect the identity they've always had.	Adopted: Addressed in Procedures IV (B).
107 Interactions with LGBTQ+ Individuals	Pursuant to Md. Code Ann., State Government § 20-304,	Adopted: Addressed in Procedures VIII (A).
107 Interactions with LGBTQ+ Individuals	If it isn't in the "Definitions", then it shouldn't be capitalized.	Adopted: Addressed in Procedures VI (A).
107 Interactions with LGBTQ+ Individuals	This should be rephrased to be a policy--"Members shall not immediately suspect that the possession of needles is indicative of drug use or illegal drug paraphernalia as they may be indicative of a prescribed hormone replacement therapy."	Adopted: Addressed in Procedures VI (A).
107 Interactions with LGBTQ+ Individuals	You could deadname or misgender anyone, not just transgender people.	Adopted: Addressed in Procedures X (C).
107 Interactions with LGBTQ+ Individuals	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.	Original Language Retained: Terms and Definitions in this Directive are adopted from the National Institute of Health's Office of Equity, Diversity and Inclusion, Sexual & Gender Minority Employment Portfolio, terms and definitions, with internal cross references omitted, available at: https://www.edi.nih.gov/people/sep/lgbt/safezone/terminology , with the exception of Affirmed/Chosen Name and Legal Name, which are adopted from JHU's Chosen Name Policy.
107 Interactions with LGBTQ+ Individuals	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).	Original Language Retained: Terms and Definitions in this Directive are adopted from the National Institute of Health's Office of Equity, Diversity and Inclusion, Sexual & Gender Minority Employment Portfolio, terms and definitions, with internal cross references omitted, available at: https://www.edi.nih.gov/people/sep/lgbt/safezone/terminology , with the exception of Affirmed/Chosen Name and Legal Name, which are adopted from JHU's Chosen Name Policy.

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	<p>4) Definition for Transgender: the word "transsexual" is used but is not also defined. Later, "transsexualism" is noted as a word to avoid, but again, transsexual is skipped. Since some people use the term "transsexual" 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 unless the person themselves asked to be referred to that way. Defaulting to trans or transgender is much safer.</p>	Adopted: Addressed in Definitions and Procedures I (A).
107 Interactions with LGBTQ+ Individuals	<p>5) Under culturally-aware language A: I certainly hope it shouldn't have to be stated, but perhaps it does: there are a number of slurs for trans people that should never be used. Perhaps adding a statement that slurs should never be used (without having to name the slurs) is a way to approach this.</p>	Adopted: Addressed in Procedures IV (B).
107 Interactions with LGBTQ+ Individuals	<p>6) Under culturally-aware language B: remove the word "often." Police should be trained not to use the phrases at all. And add "transgendered" as an inappropriate term.</p>	Adopted: Addressed in Procedures I (B).
107 Interactions with LGBTQ+ Individuals	<p>7) Section V.A: when obtaining and recording the person's legal name and legal sex, asking them one-on-one is a good tip. A better tip is to ask to them to show their ID so the office can write down the legal name, such that no one ever has to say it out loud. It can be mortifying and humiliating. If an officer showed enough respect and awareness to ask to -see- my ID to get my legal name instead of asking my legal name out loud, I'd almost confess right then and there. (Kidding. But it matters!)</p>	Adopted: Addressed in Procedures V (A).
107 Interactions with LGBTQ+ Individuals	<p>Bigger issues: I see several points in which officers will need much more examples and training to implement these policies:</p> <p>1) Section IV.A.: How will officers determine who to ask gender identities? Quote: "When a member needs to determine a person's gender identity, if the member is uncertain..." When are they "uncertain"? How are they "reading" people? Hopefully -not- by relying on stereotypes of trans women. Trans people look all sorts of ways, including exactly like cis people, and are not "obviously" trans, non-conforming, androgynous, etc. The -only- reliable way to know a person's gender identity is to ask them. Police need to either ask ALL people their genders (which some cis people will get nasty about), or none. Police could ask name, gender, age, address--whatever it is they need to know--of ALL people. Again, everyone has a gender.</p>	Adopted: Addressed in Procedures IV (A).

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	2) Section IV.B: More examples of gender-neutral alternatives would be helpful, with practice, practice, practice. I'm sure "sir" and "ma'am" has been ingrained into officers to show respect. To replace that takes time and practice, practice, supervision, enforcement, role modeling, etc. Folks, people, friends, boss, chef, fam, sibling, parent, offspring, youth. "Mx" (pronounced Mix) is a gender-neutral alternative to Mr/sir or Ms/ma'am.	Adopted: Addressed in Procedures IV (B).
107 Interactions with LGBTQ+ Individuals	3) Section IV.B last point about mistakenly misgendering and apologizing: examples and practice in training will be helpful. "The victim left his car--sorry, her--car on the side..." "She said--they said, sorry-- that they called 5 minutes before...."	Adopted: Addressed in Procedures XI.
107 Interactions with LGBTQ+ Individuals	4) Section VI.B Arrest and Transport, bullet 3: "member shall verbally inform..." of the person's trans status at booking and intake. I can see this going awry and (purposely or not) outing someone in what could be a very dangerous situation. Can this information be given 1) only if absolutely necessary and 2) non-verbally? Or at least privately?	Adopted: Addressed in Procedures VI (B).
107 Interactions with LGBTQ+ Individuals	5) IX.B on Youth. This could be an apparent contradiction between never using a person's deadname and misgendering them and ALSO protecting a youth's trans/enby identity from their parents' if the youth is not out to the parents. There are definitely ways to avoid misgendering/deadnaming a youth while simultaneously not outing them to the parents. But members will need direction and training on that. (Avoiding saying the kids' name, using gender neutral terms like kid, child, youth, offspring, avoiding using pronouns for the youth--it's tricky but can be done with some creativity and thought.)	Adopted: Addressed in Procedures IX.
107 Interactions with LGBTQ+ Individuals	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.	Original Language Retained: To maintain consistency with the Johns Hopkins University Roadmap On Diversity and Inclusion and the Johns Hopkins Health System, "LGBTQ+" will remain.
107 Interactions with LGBTQ+ Individuals	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.	Adopted: Addressed in Procedures III (B). Additionally, after the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
107 Interactions with LGBTQ+ Individuals	Section IV.B is very well written using all modern standards on how to deal with names and pronouns.	No Actionable Recommendation.

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	In the definition for Cisnormativity, 'cisgender' is referred to as a gender. It is actually category of gender identity, as is 'transgender,' and not a gender in itself. NIH possibly missed this in their definition as an oversight.	Original Language Retained: Terms and Definitions in this Directive are adopted from the National Institute of Health's Office of Equity, Diversity and Inclusion, Sexual & Gender Minority Employment Portfolio, terms and definitions, with internal cross references omitted, available at: https://www.edi.nih.gov/people/sep/lgbti/safezone/terminology , with the exception of Affirmed/Chosen Name and Legal Name, which are adopted from JHU's Chosen Name Policy.
107 Interactions with LGBTQ+ Individuals	This is implied through "use correct pronouns going forward".	Adopted: Addressed in Procedures IV (B).
107 Interactions with LGBTQ+ Individuals	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.	Original Language Retained: Training will prioritize the use of culturally sensitive language when discussing underrepresented communities.
107 Interactions with LGBTQ+ Individuals	a) IX. 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.	Adopted: Addressed in Procedures III (F).
107 Interactions with LGBTQ+ Individuals	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 disclosure, without consent, must be seriously weighed and only pursued when clearly necessary/required.	Adopted: Addressed in Procedures III (F).
107 Interactions with LGBTQ+ Individuals	This should be in training, not in policy. It just looks bad on their part.	Original Language Retained: Including guidance on language in an outward-facing policy ensures and demonstrates to the community that the JHPD is committed to inclusive and respectful interactions.
107 Interactions with LGBTQ+ Individuals	I'm appalled that JHPD would include a chart that includes slurs. If there are members of JHPD who part of the LGBTQ+ community, this can be triggering. If there are situations where this information is needed, it should be done on a case-by-case basis in a tactful way, especially during training. It is not appropriate to have this in a policy.	Adopted: Removed from Procedures I (A).

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	Under Procedures, VI. Search, Seizure, Arrest, and Transport, A., "...A person's possession of needles may be indicative of a prescribed hormone replacement therapy and is not necessarily indicative of drug use or illegal drug paraphernalia" should be rephrased to be a policy; "Members shall not immediately suspect that the possession of needles is indicative of drug use or illegal drug paraphernalia as they may be indicative of a prescribed hormone replacement therapy.	Adopted: Addressed in Procedures VI (A).
107 Interactions with LGBTQ+ Individuals	This entire chart is offensive. As someone in the LGBTQ+ community, I'm appalled that a "progressive" institution would find it satisfactory to include a chart like this. It is extremely inappropriate, triggering, and if they must do a "do this, not that", then it should be done during training. Not in policy.	Adopted: Removed from Procedures I (A).
107 Interactions with LGBTQ+ Individuals	JH should consider adding "Pronouns" to their definitions since JHU is a campus that now embraces (from what I'm told) asking and offering pronouns.	Adopted: Addressed in Definitions.
107 Interactions with LGBTQ+ Individuals	JH should also consider adding a "See Pronouns at JHU" link since they have one.	Adopted: Addressed in Definitions.
107 Interactions with LGBTQ+ Individuals	JH should consider having "Chosen Name" on the form as well. I know that they do on most Registrar/academic forms.	Adopted: Addressed in Procedures V (A).
107 Interactions with LGBTQ+ Individuals	Why is "Equal Treatment" and "Discrimination Prohibited" two separate sections? "Non-Discrimination" would cover both...	Original Language Retained: The language as structured is meant to distinguish between affirmative guidance and prohibitions.
107 Interactions with LGBTQ+ Individuals	THIS is great. With this, the "don't say that" can be reserved for training or on an as needed basis. But it isn't hard, so I doubt they would really have a need to begin with.	Adopted: Removed from Procedures I (A).
107 Interactions with LGBTQ+ Individuals	Again, I hope JH does this in training, not in policy. If there are members of JHPD who are part of the LGBTQ+ community, reading through this on an annual basis could be triggering and offensive.	Original Language Retained: Including guidance on gender-neutral language in an outward-facing policy ensures and demonstrates to the community that the JHPD is committed to inclusive and respectful interactions.
107 Interactions with LGBTQ+ Individuals	This is awesome to see in policy.	No Actionable Recommendation.
107 Interactions with LGBTQ+ Individuals	Would this also be considered a FERPA violation? I'm not sure since it wouldn't be under an academic record? Even though its an academic institution?	Reflected: FERPA guidance is addressed in JHPD Directive #210, Records Management.

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	This is great to see in policy!	No Actionable Recommendation.
107 Interactions with LGBTQ+ Individuals	6) XI. Training. See above for examples of points on which training will be particularly important.	Adopted: Addressed in Procedures XI.
107 Interactions with LGBTQ+ Individuals	IV. B - "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 students already struggle to correct their name/gender marker in JHU's systems. This sentence should be removed.	Adopted: Addressed in Procedures IV (B).
107 Interactions with LGBTQ+ Individuals	IV. A - "Acknowledging a person's gender identity" - what training will police and all staff be receiving to ensure that these policies are being upheld? LGBTQ+ competency training is absolutely a must to ensure all JHPD understand how to respect individual's identities. What disciplinary actions will be taken to address staff who fail to follow these requirements? What systems are in place for trans students to report when police have harmed them or not respected their identities?	Adopted: Addressed in Procedures XI.
107 Interactions with LGBTQ+ Individuals	V.A - "If a member has a need to determine an individual's legal name, they should ideally ask for this information one-on-one rather than in the presence of bystanders or witnesses." This should not happen "ideally", this should ALWAYS happen. Otherwise it will lead to situations where JHU members are outed as transgender to classmates, professors, etc, which is unacceptable and will lead to harm.	Adopted: Addressed in Procedures V (A).
107 Interactions with LGBTQ+ Individuals	VI.A - "Absent exigent circumstances, if any person to be searched requests that a member of a particular gender conduct the search, the member should accommodate the request. The person's request shall be documented. " -- This should not have to be requested, everyone should be given the option and police should be trained to ask all individuals what their preference is. Trans students will already be under extreme stress when they are being stopped (and there is a power imbalance), and many will not feel comfortable making this request. Police should be trained to ask students what gender they prefer to conduct the search. Police should also be required to document when the student's requests were not respected, that is, when they were searched by someone of incorrect gender. When this happens, it can be traumatizing for trans individuals.	Adopted: Addressed in Procedures VI (A).

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	<p>VI.A "not conduct a weapon pat down or search any person to determine that person's gender identity or sex, or to view or touch the person's genitals, or for any demeaning or harassing purpose." How will you ensure the members that you hire are not transphobic? Will that be a job requirement? Trans and queer people experience disproportionate rates of sexual violence. This will continue here as well unless you have systems in place to prevent it.</p>	<p>Reflected: JHPD Directives #302, Recruitment and Selection, and #303, Background Investigations, detail JHPD hiring standards and background investigations to determine any evidence of prior examples of bias.</p>
107 Interactions with LGBTQ+ Individuals	<p>A person's possession of needles may be indicative of a prescribed hormone replacement therapy and is not necessarily indicative of drug use or illegal drug paraphernalia." What is the policy here? This is just a statement which is meaningless without some kind of policy statement, which needs to be added. This should mean that police are not allowed to arrest or search students based on the possession of needles, and students should not be required to prove why they have needles by providing a prescription. Needles can be purchased without a prescription at the pharmacy, which many trans individuals do.</p>	<p>Adopted: Addressed in Procedures VI (A).</p>
107 Interactions with LGBTQ+ Individuals	<p>VIII.A - "Members shall not stop, question, or arrest a person for using a single-sex restroom based to any extent or degree on the person's actual or perceived gender identity, g"</p> <p>WHY ONLY SINGLE SEX RESTROOMS? This rule should apply for all restrooms. Trans people who do not pass frequently use male/female restrooms. This policy is unacceptable as it is written. It needs to be made EXPLICIT that the same applies for male/female restrooms as well. And if not, JHU needs to immediately ensure there are single sex bathrooms accessible in every single building on campus, which is currently very far from being the case.</p>	<p>Adopted: Addressed in Procedures VIII (A).</p>
107 Interactions with LGBTQ+ Individuals	<p>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".</p> <p>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.</p>	<p>Reflected: Procedures VI (B) provides a plan for when individuals express a safety concern. It states that if they express a safety concern, they will be transported alone.</p>

Policy Number and Title	Comment	Disposition
107 Interactions with LGBTQ+ Individuals	<p>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 to not use this term at all 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!</p>	Adopted: Addressed in Procedures I (A).
107 Interactions with LGBTQ+ Individuals	<p>I am [REDACTED], and community member. 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. I am trans myself and teach LGBTQ health and am nationally known and highly regarded in the transgender health world. 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.</p>	No Actionable Recommendation.
107 Interactions with LGBTQ+ Individuals	<p>I will begin this, and all other feedback I give with the following:</p> <p>I have not read each and every policy that you have posted. I simply don't have the time to do that alongside keeping up with my work. I have simply selected a handful of them, found them all to be egregious, and am criticizing them as they stand. I am sure that if I read the rest, I would find them similarly lacking. I will primarily be using your prompt "Is this policy consistent with the values and needs of the community?"</p>	No Actionable Recommendation.

Policy Number and Title	Comment	Disposition
	<p>Now, I find not much particularly awful about the policy! Speaking as a transgender woman, I have been routinely harassed and demeaned by police officers. Police officers at the institutions that you base your policies on. The very fact that this is a "training" you need to give people in order to grant me and my community a modicum of the basic respect that is routinely denied to us is ridiculous. Of course, people should get the chance to be taught about ways to move past their own bigotries. Everyone deserves forgiveness and a second chance. But giving someone the 101 info that most elementary schoolers are taught and then sending them armed into communities with a variety of queer people and hoping that it will be enough is ridiculous. The functional imperatives of police require them to make snap judgements, and a basic course, guideline on the correct words to use will not help at the end of the day. If someone looks at me and thinks "Hermaphrodite" or "Transvestite" or "having a Transgender lifestyle," a basic "here's what you say instead" won't fundamentally change the way that I am viewed. It will not change the fact that I will be viewed as alien, as freak, as other. I have come to terms with the fact that plenty of members of Johns Hopkins view me that way. But they do not hold extreme powers over me the way that police do.</p> <p>In short, either such a policy is useless, as the police hired already believe that I and my community are full humans or it is useless because they already don't. And the fact that so many police departments think to write this is clear evidence for the latter. My history with the police, my friends history with the police, and the long, long story of police interactions with queer communities is fraught with dehumanization and is clear evidence for the latter. This policy is perfect for what it is, and is woefully lacking when it comes to making the many, many people like me feeling safe. I don't know what you could do to make it work. I really don't."</p>	
109 Procedural Justice	This isn't a complete sentence.	Adopted: Addressed in Procedures I (C).
109 Procedural Justice	Parts of BPD Policy 325, Procedural Justice in Interactions, are within JHPD's policies, however, some key points are missing.	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
109 Procedural Justice	Same as BPD Policy 325, paragraph 1.	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
109 Procedural Justice	Also same as BPD Policy 325.	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.

Policy Number and Title	Comment	Disposition
109 Procedural Justice	If taking this from BPD Policy 325, Principles of Procedural Justice, why not keep the same format? I. Fairness, B., is "Respect" under BPD policy...	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
109 Procedural Justice	Again, taken from BPD Policy 325, Principles of Procedural Justice--why were these turned into policies when they are principles? By having "...shall.." it is now a policy.	Original Language Retained: JHPD includes affirmative policy statements in it's core principles to provide clarity and direction, ensuring that the principles are both actionable and aligned with the overarching goals.
109 Procedural Justice	Same as before, but why not make this "Trustworthiness" like in BPD Policy 325?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
109 Procedural Justice	<p>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 member of a marginalized community (LGTBQIA+, students, racial minorities, and immigrants).</p> <p>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 in 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.</p>	Adopted: Addressed in Procedures II (C). All officers will receive training on procedurally just policing, which will include the perspectives of members of marginalized communities, behavioral health professionals, and others.
110 Observation & Recording of Police Services	Pg. 3 examples of interference, this needs to be more clear "Tampering with a witness (including repeatedly instructing a witness being questioned by a member not to respond to the member's questions)." Reminding someone that they have a right to refuse to answer questions, especially if they are a family member, shouldn't be considered witness tampering.	Adopted: Addressed in Procedures I (E).
110 Observation & Recording of Police Services	b) Telling a witness not to answer questions is grounds for an order to stop recording. Consider removing this stipulation in order to avoid infringing on right to speech.	Adopted: Addressed in Procedures I (E).

Policy Number and Title	Comment	Disposition
110 Observation & Recording of Police Services	<p>I am not questioning the need for a "reasonable perimeter" for the policy to conduct their business when they are being observed or recorded (II.N). However, there does seem to be enough room for variation in the interpretation of "reasonable" to lead to disagreements with the individuals doing the observing or recording and the result being an altercation that might need to be de-escalated or could result in other undesirable outcomes. Is there sufficient information on how the term "reasonable" gets interpreted by police and observers to make everyone comfortable with the notion that this will not be abused?</p>	Adopted: Addressed in Procedures II (N).
110 Observation & Recording of Police Services	<p>a) Confusing wording – “JHPD members shall respect and shall not infringe, upon the right of all persons to observe and record the actions of law enforcement officers... so long as the observation or recording does invade the privacy of members of the community; should read “does not” –</p>	Adopted: Addressed in Policy Section.
110 Observation & Recording of Police Services	<p>The followeing sentence, like many others, is very confusing. It also includes a mistake :</p> <p>"Summary of Directive Requirements This Directive explains the legal protections related to members of the public observing and recording police activity. It specifically dictates that JHPD members shall respect and shall not infringe, upon the right of all persons to observe and record the actions of law enforcement officers in the public discharge of their duties in all public spaces (including sidewalks, parks, and other locations for lawful public protest) on its campus, as well as in all other areas in which persons have a legal right to be present (including a person’s home or business and common areas of public and private facilities and buildings), so long as the observation or recording does invade the privacy of members of the community, does not threaten the safety of any member or any other person, and does not physically interfere with the performance of any member’s duties."</p> <p>The passage "so long as the observation or recording does invade the privacy of members of the community" should read "so long as the observation or recording does ***NOT *** invade the privacy of members of the community." The same mistake is repeated further down in the document</p>	Adopted: Addressed in Policy section.
110 Observation & Recording of Police Services	<p>Under the Core Principles, a key piece is missing--the right to retain their recorded material. These rights are protected by the First, Fourth and Fourteenth Amendments of the United States Constitution; Articles 10, 24, and 26 of the Maryland Declaration of Rights; and 42 U.S.C. § 2000aa-(b). Excluding this is negligent.</p>	Adopted: Addressed in Core Principles.
110 Observation & Recording of Police Services	<p>This is missing a key part of this--the right to retain their recorded material.</p>	Adopted: Addressed in Core Principles.

Policy Number and Title	Comment	Disposition
110 Observation & Recording of Police Services	If a PO is saying, "please stop recording", etc. no matter what, it is going to seem like an order. Other than saying, "I'm asking you to voluntarily stop recording", there isn't a lot that won't sound like an order.	Adopted: Addressed in Procedures II (B).
110 Observation & Recording of Police Services	Other policies have "Supervisors" as its own subsection and subtitle; this should follow the same format.	Adopted: Addressed in Procedures IV.
110 Observation & Recording of Police Services	This policy is from BPD Policy 1016, will JHPD also have a policy for First Amendment Protected Activity?	Reflected: JHPD Directive #486, Assemblies, Demonstrations & Disruption of Campus Activities, details the subject matter covered in BPD Policy 1016. Additionally, JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
110 Observation & Recording of Police Services	Thank you for the opportunity to submit comments. Please explain what a first amendment auditor is.	Original Language Retained: First Amendment auditor is defined in Definitions.
111 Duty to Intervene	a) Procedures I. General: 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? -	Adopted: Addressed in Policy.
111 Duty to Intervene	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. -	Adopted: Addressed in Procedures III (C).
111 Duty to Intervene	Already used "ultimately".	Adopted: Addressed in Core Principles III.
111 Duty to Intervene	There is a confusion throughout this Policy between active bystandership and duty to intervene. While similar, these are not the same things. Active bystandership is when an individual sees the opportunity for a safe intervention into a situation. Duty to intervene is when an individual is required to intervene into a situation.	Original Language Retained: This directive provides JHPD members with an understanding of both terms which are synonymous in promoting intervention to prevent harm or misconduct. This is crucial for fostering a culture of accountability and proactive intervention within law enforcement and the community at large.
111 Duty to Intervene	This isn't a policy. Where is the policy?	Adopted: Addressed in Policy.
111 Duty to Intervene	Ok, they advocate for it; this isn't specifying that they will be participating in the program.	Adopted: Addressed in Core Principles I.

Policy Number and Title	Comment	Disposition
111 Duty to Intervene	This is problematic because it is only discussing how it helps JH. What about the community? Preventing and stopping misconduct and/or other problematic behavior will also greatly impact the civilians and communities, too. I know this is from BPD Policy 319, but they didn't go as far to add "legitimacy"...	Adopted: Addressed in Core Principles I.
111 Duty to Intervene	I'm torn with all the "Core Principles" that come straight from another department's core principles... It makes me question if they mean it, or if they are just copying to get the job done (even if it is from great core principles and policies).	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
111 Duty to Intervene	This isn't an Active Bystandership policy, it is a Duty to Intervene policy--these are two different things. Active bystandership is when someone may want to intervene in a situation. Duty to intervene is when someone has to intervene in a situation. This confusion is throughout this policy and its subsequent directives.	Original Language Retained: This directive provides JHPD members with an understanding of both terms, which are synonymous in promoting intervention to prevent harm or misconduct. This is crucial for fostering a culture of accountability and proactive intervention within law enforcement and the community at large.
111 Duty to Intervene	An example of where I'm torn...This is basically BPD Policy 319, Core Principles, Officer Safety & Wellness. They changed "BPD's" to "JHPD's", and slightly reworded "to member safety and wellness" to "to the safety and wellness of our personnel". Do they mean it? Why didn't they take the time to write their own "Core Principles" (despite BPD's being stellar)?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
111 Duty to Intervene	CORRECT! Policy!	No Actionable Recommendation.
111 Duty to Intervene	Can't explain how happy I am to see this in policy!!!	No Actionable Recommendation.
111 Duty to Intervene	This Policy will assist and reinforce any guided line that needs to be clarify in the community that been service and can ease any discrepancy that may arrive in the future.	No Actionable Recommendation.
201 Authority, Department Organization & Command	<p>Page 2, section I.C.</p> <p>Please ADD after 'authorizes': "BUT DOES NOT REQUIRE police officers to carry handguns"</p> <p>Nothing in the Maryland law nor CSSA mandates the JHPD to be armed. Hopkins has not properly justified why its private police should be armed and going forward with the guns the policies suggest is in fundamental contradiction with the values and mission of the Johns Hopkins University.</p>	Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.

Policy Number and Title	Comment	Disposition
201 Authority, Department Organization & Command	<p>p. 2, section I.C.</p> <p>Change "authorizes police officers to carry handguns" to "authorizes, but does not mandate, police officers to carry handguns."</p> <p>Justification: The directive should make clear that the decision to carry handguns is optional and not required by law. For example, Baltimore City Community College has sworn officers who do not carry weapons. Because the community is strongly opposed to JHU having a private armed police force, and because there is no evidence that more guns make people safer, JHPD should avoid any directives that suggest it is normal or expected for officers to carry weapons or to use lethal force.</p>	<p>Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
201 Authority, Department Organization & Command	<p>A. RE: "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?</p>	<p>Adopted: Addressed in Procedures II (B).</p>
201 Authority, Department Organization & Command	<p>p. 4, section II.A.</p> <p>Please specify some constraints or limits on the ability to engage in fresh pursuit. The draft wording is not acceptable because this would allow unbounded time or distance in pursuit.</p>	<p>Adopted: Addressed in Procedures II (A).</p>
202 Written Directive System	<p>This isn't in alphabetical order and is missing the definition of "Policy" and "PowerDMS".</p>	<p>Adopted: Addressed in Definitions.</p>
202 Written Directive System	<p>Why is this not in the "Definitions" portion of the policy?</p>	<p>Adopted: Addressed in Definitions and Procedures II (D).</p>
202 Written Directive System	<p>Under Policy, "his" needs to be changed to "their" because the Chief of Police may not always be male.</p>	<p>Adopted: Addressed in Policy.</p>
202 Written Directive System	<p>Where is this?</p>	<p>Adopted: Addressed in Procedures II (E).</p>

Policy Number and Title	Comment	Disposition
202 Written Directive System	<p>The following definitions are missing from the "Definitions": Special Order Are written directives that may be utilized to temporarily implement, update, and amend a policy or procedure in response to an emerging or rapidly developing issue. Special orders provide specific instructions governing particular situations and may be used to relay information department-wide or to a particular group or section of personnel.</p> <p>Official JHPD Memorandums May be used to provide specific instructions as a matter of official event briefings, training, or other administrative matters of a department-wide, bureau, or other audience.</p> <p>PowerDMS A Policy management software program that provides for distribution, acceptance, tracking, maintenance, and training of JHPD written policies and directives.</p>	Adopted: Addressed in Definitions.
202 Written Directive System	Under Procedures, IV. Terminology Limiting Discretion should be in training, not in a policy.	Original Language Retained: This language is included here due to its importance for interpretation of rules during disciplinary hearings.
202 Written Directive System	This is a definition of "procedures"... It isn't identifying the procedures carried out by the department (per CALEA 12.2.1.h).	Adopted: Addressed in Definitions and Procedures II (C).
202 Written Directive System	Would the Senior Director for Policy, Training, and Accreditation really be considered a CEO?	Adopted: Addressed in Procedures V (C).
202 Written Directive System	This belongs in training; it's not policy.	Original Language Retained: This language is included here to ensure proper interpretation of terminology used throughout the JHPD Policy Manual.
208 Uniforms & Equipment	VI. Body Amor: 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.	<p>Adopted: Addressed in Procedures VI (E).</p> <p>As noted, this section indicates that officers are encouraged but not required to wear a bullet-proof vest. This is a safety provision that is available at each officer's discretion. However, it's important to note that when worn, the vest will be under the uniform shirt to avoid the military appearance of the external vest. In an active assailant scenario, JHPD expects its officers to immediately intervene to neutralize the threat. That expectation requires that officers be properly equipped for such a scenario.</p>
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.	Adopted: Addressed in Procedures III (J).

Policy Number and Title	Comment	Disposition
208 Uniforms & Equipment	<p>As a JHU alum and Baltimore city resident, I strongly advocate against the presence of firearms on campus in any capacity. Officers should be restricted to the usage of non-lethal weapons, such as pepper spray. Studies have indicated that armed officers do not prevent gun-related incidents (The Thin Blue Line in Schools: New Evidence on School-Based Policing Across the U.S. by Lucy C. Sorensen, Montserrat Avila-Acosta, John B. Engberg, and Shawn D. Bushway). In fact studies from the RAND institute directly indicate that it increases the chances of school shootings and bystander injuries. Additionally, it would create further distrust between students at risk of racial profiling and the administration, which would disproportionately affect low-income FLI students and other minority groups on campus. As Johns Hopkins is one of the leading researchers in gun violence and prevention (as per the Bloomberg School of Public Health's Center for Gun Violence) it would reflect badly on the institution to be the center of an instance of gun violence or misuse of a firearm within one of their campuses by a JPD member. The risk to the institutional reputation greatly outweighs what are proven to be limited (if any) benefits.</p>	<p>Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
209 Fleet Management	<p>"If the vehicle is equipped with a GPS Antenna, it will be connected to the Mobile Data Computer (MDC) and activated during vehicle operations." - could more detail be added on which vehicles are selected for GPS tracking and how that data will be used. Could that data be available to the public if requested?</p>	<p>Adopted: Addressed in Procedures IV (F). JHPD Directive #210, Records Management, details publicly available records.</p>
210 Records Management	<p>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</p>	<p>Original Language Retained: At present, this is not a capability JHPD possesses; however, it is a possibility in the future.</p>
210 Records Management	<p>Could the JHPD describe their process to ensure the cybersecurity of the criminal records and other files?</p>	<p>Reflected: Cybersecurity responsibilities are detailed in Procedures VI (B).</p>
210 Records Management	<p>Critical incidents go through AGs office and Johns Hopkins Public Safety Accountability Unit (PSAU) but non critical incidents will go through PSAU re: records release. **Who is on the PSAU?</p>	<p>Reflected: JHPD Directive #350, Complaints Against Police Personnel, details Public Safety Accountability Unit description and responsibilities.</p>
210 Records Management	<p>How similar is this policy to BCPDs policy?*</p>	<p>Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.</p>

Policy Number and Title	Comment	Disposition
210 Records Management	<p>Feedback - Overall, the multiple policies provided claim to be one for a model, progressive, new type of police department, based on research by 21CP. Aside from this being a faulty premise (based on the history and reason police departments were introduced to begin with), there are too many policies that do not consider recent findings and investigative reporting. The plans to move forward also ignore the research conducted by our own JHU faculty (e.g., https://hardhistoriesjhu.substack.com/p/jhu-policing-and-our-origin-stories?utm_source=twitter&sd=pf, https://hub.jhu.edu/2023/12/05/baltimore-area-survey/). To provide additional evidence, I am going into detail with respect to one of many examples within Directive 210, which outlines the process whereby members of the public can request JHPD records and recordings for the body-worn cameras (as described within Directive 433):</p> <p>"IX. Public Requests for Records & Recordings</p> <p>A. Pursuant to MD Code, Education, §24-1210, the JHPD shall allow a person or governmental unit to access information as a person or governmental unit would be able to access a public record of a law enforcement agency, under the Public Information Act (PIA), if the information is included in records that are:</p> <ul style="list-style-type: none"> · Created solely for law enforcement purposes, or · Related to an arrest for a criminal offense, and · Would be subject to disclosure under the PIA if the information were in a record created by a law enforcement agency. <p>B. In addition, pursuant to MD Code, General Provisions, §4-311, all records relating to an administrative or criminal investigation of misconduct by a police officer, including administrative investigatory records, a hearing record, and records relating to a disciplinary matter, except for records related to technical infractions, shall remain confidential, but are subject to public disclosure upon request. All documents related to technical violations shall remain confidential and are not subject to public disclosure.</p> <p>C. Members of the public seeking to review a JHPD recording or record in which they are a person in interest, may request to do so, at any time, via telephone, in person, in writing, or via the request for information form linked below. A JHPD supervisor will obtain the recording or record and facilitate the review of the recording or record for the interested party.</p> <p>D. Members of the public seeking to obtain JHPD records, including BWC footage or records related to misconduct may make a request by submitting a written request for JHPD records to the JHPD PIO via the Record Request webform, mlocated on the Johns Hopkins Public Safety (JHPS) website under Requests for Information or in writing at:</p>	<p>Adopted: Addressed in Procedures IX (E) by adding directives that a Public Information Officer processing any JHPD record request will respond according to a provided time frame.</p>

Policy Number and Title	Comment	Disposition
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JHPS
 c/o JHPD PIO
 1101 E. 33rd St.
 Baltimore, MD 21218

E. All requests for records and recordings, regardless of the identity of the requester or form of the record (e.g., electronic, photograph, recording, audio, paper, etc.), received by the JHPD shall be immediately forwarded to the PIO, with a copy to Office of the Senior Vice President and General Counsel for JHU for review.

F. Upon receipt of the record request, the PIO will log all requests and gather responsive records and recordings, unless the records are related to misconduct, in which case, after being logged, the request shall be immediately forwarded to the designated PSAU member to gather the responsive records and recordings.

- The PIO or PSAU member will make a preliminary determination as to whether the records or recordings are accessible to the public, pursuant to MD Code, Education, §24-1210 or MD Code, General Provisions, §4-311 and if so, any redactions that should be applied under the PIA or other applicable laws. The PIO will then forward the records and the request to the Office of Senior Vice President and General Counsel for JHU for legal review to ensure compliance with MD Code, Education, §24-1210 or MD Code, General Provisions, §4-311, the PIA, and other applicable laws.

- Upon completion of the legal review, and as soon as possible, within the most relevant PIA time periods, the PIO or PSAU member shall provide the records or recordings to the requester or issue a denial letter stating the reason the request was denied.”

Despite this lengthy text, the policy does not concretely state how long it will take for a public request for body-worn camera footage to be fulfilled. Instead, the policy states, “Upon completion of the legal review” (how long will legal review take?), “as soon as possible” (what is a reasonable time frame for “as soon as possible”?), and “within the most relevant PIA time periods” (what are best-case and worst-case examples of “the relevant PIA time periods”?). What are best-case and worst-case examples for this entire waiting period?

1. “When body-worn cameras were introduced a decade ago, they seemed to hold the promise of a revolution. Once police officers knew they were being filmed, surely they would think twice about engaging in misconduct. And if they crossed the line, they would be held accountable: The public, no longer having to rely on official accounts, would know about wrongdoing. Police and civilian oversight agencies would be able to use footage to punish officers and improve training. In an outlay that would ultimately cost hundreds of millions of dollars, the technology represented the largest new investment in policing in a generation.”

Policy Number and Title	Comment	Disposition
	<p>2. “Yet without deeper changes, it was a fix bound to fall far short of those hopes. In every city, the police ostensibly report to [authorities]. But in practice, they have been given wide latitude to run their departments as they wish and to police — and protect — themselves. And so as policymakers rushed to equip the police with cameras, they often failed to grapple with a fundamental question: Who would control the footage?”</p> <p>3. “Even when departments have stated policies of transparency, they don’t always follow them. Three years ago, after George Floyd’s killing by Minneapolis police officers and amid a wave of protests against police violence, the New York Police Department said it would publish footage of so-called critical incidents “within 30 days.” There have been 380 such incidents since then. The department has released footage within a month just twice.”</p> <p>4. “And the department often does not release video at all. There have been 28 shootings of civilians this year by New York officers (through the first week of December). The department has released footage in just seven of these cases (also through the first week of December) and has not done so in any of the last 16.”</p> <p>5. “Asked about the department’s limited release of footage, a spokesperson pointed to a caveat, contained in an internal order, that footage can be withheld because of laws or department policy.“</p> <p>The N.Y.P.D. remains wholly committed to its policy of releasing such recordings as quickly and responsibly as circumstances and the law dictate,” the spokesperson wrote. “Though transparency is of the utmost importance, so too is the Police Department’s commitment to preserving privacy rights.” ...”</p> <p>6. “For a snapshot of disclosure practices across the country, we conducted a review of civilians killed by police officers in June 2022, roughly a decade after the first body cameras were rolled out. We counted 79 killings in which there was body-worn-camera footage. A year and a half later, the police have released footage in just 33 cases — or about 42 percent.”</p> <p>7. “This article is the product of more than six months spent investigating how the police have undermined the promise of transparency and accountability that accompanied the body-camera movement. We interviewed dozens of department insiders, government lawyers, policing experts and advocates and reviewed hundreds of pages of internal reports, obtained through Freedom of Information requests, and dozens of hours of surveillance-camera and body-camera footage, including some that the New York Police Department fought against disclosing. The reporting reveals that without further intervention from city, state and federal officials and lawmakers, body cameras may do more to serve police interests than those of the public they are sworn to protect.”</p>	

Policy Number and Title	Comment	Disposition
	<p>8. "President Barack Obama put the cameras at the center of his plans to restore trust in policing. Cities quickly began spending millions on the devices, expenditures that continue today for storage and software. Los Angeles has spent nearly \$60 million since getting cameras in 2016. In Philadelphia, where footage is rarely released, the cameras have cost taxpayers about \$20 million. New York City has spent more than \$50 million. But whether citizens benefit from the cameras they're paying for is often up to the police, who have often been able to keep footage hidden from the public in even the most extreme cases. In 2018 in Montgomery, Ala., an officer unleashed his police dog on a burglary suspect without warning, severing the Black man's femoral artery and killing him. The police and the city have refused to release footage for five years, arguing that it could cause "civil unrest" and that the officers could face "embarrassment." But a lawyer for the man's family, which is suing the city, got a copy of the transcript in the discovery process and entered it into the court record. "Did you get a bite?" an officer asked the one who had the dog, according to the document. "Sure did, heh, heh," the K-9 officer responded."</p> <p>9. "The secrecy undercuts the deterrent effect on officer behavior that many had presumed body cameras would produce. Three years before the Minneapolis police officer Derek Chauvin murdered George Floyd by kneeling on his neck, body-camera video caught him kneeling on the necks of others. In 2017, Chauvin dragged a handcuffed Black woman out of her house, slammed her to the ground and then pressed his knee into her neck for nearly five minutes. Three months later, Chauvin hit a 14-year-old Black boy at least twice in the head with a heavy flashlight, choked him and pushed him against a wall. The boy cried out in pain and passed out. Chauvin pushed a knee into his neck for 15 minutes as the boy's mother, reaching to help him, begged, "Please, please do not kill my son!"..."</p> <p>10. "The footage was left in the control of a department where impunity reigned. Supervisors had access to the recordings yet cleared Chauvin's conduct in both cases. Minneapolis fought against releasing the videos, even after Chauvin pleaded guilty in December 2021 to federal civil rights violations in one of the cases. A judge finally ordered the city and the police to release the tapes this April, six years after Chauvin abused the boy. "Chauvin should have been fired in 2017," says Robert Bennett, a lawyer who represented both of the victims. If the police had done that, "the city never burns. We'd have a downtown still. It's a parade of horrors. All to keep something secret!"..."</p> <p>11. "A Department of Justice report from this summer found that the secrecy and impunity was all part of a larger pattern in the Minneapolis Police Department. Shootings, beatings and other abuse had routinely been captured on video. But the department didn't make the footage public or mete out punishment."</p> <p>Given the vague timeline provided regarding public requests for footage, the entire plan for the proposed "transparent" JHPD requests for records and recordings is subject to the same fate as that provided in the examples and excerpts above. It is additionally concerning that there is a possibility for the request to be denied altogether, with no clear, upfront parameters indicating possible rationale.</p>	

Policy Number and Title	Comment	Disposition
222 Clery Act Compliance	When the JHPD is pushing security notifications, could there not be a description of the suspect? It was alarming for JHU students, faculty and staff to receive these when they personally matched the description of the suspect (e.g. Black male). The vague descriptions don't add any information. Instead just a brief description of the crime, the geographic area of concern and specific instructions (e.g. Be aware, avoid area, shelter in place) would be most helpful.	Original Language Retained: To protect against bias, Johns Hopkins does not include race in suspect descriptions unless the suspect's identity is known.
301 Personnel Management	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	Adopted: Addressed in JHPD Directive #302, Recruitment and Selection, Procedures II (B).
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)	Adopted: Addressed in Procedures XIV, XV.
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?	Reflected: JHPD Directives #302, Recruitment & Selection, and #303, Background Investigations, outline the steps to ensure potential JHPD officers are screened for any identifiable bias before employment.
302 Recruitment & Selection	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	Original Language Retained: The Johns Hopkins Accountability Board is composed of fifteen members, some of whom are not Johns Hopkins affiliates. A non-affiliate Johns Hopkins Accountability Board member may participate in interview panels to represent the community at large.
302 Recruitment & Selection	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.	Original Language Retained: The marijuana limitation is mandated by State law (COMAR MD Code Regs. 12.04.01.16). As this is a regulatory requirement, The JHPD is not at liberty to alter it in this policy.
302 Recruitment & Selection	<p>Secondarily, the 25% minimum residency requirement is frankly ridiculous. It should be 65% at a minimum.</p> <p>If we're going to welcome armed officers to our campus, then they should be invested in the overall health of the community. If they aren't, then their role is essentially that of an occupying force.</p> <p>Please, reconsider these extraordinarily lax hiring requirements. Our community deserves better. Respectfully,</p>	Original Language Retained: The 25% minimum residence requirement is established by State law and, while the current, national climate for police hiring remains challenging, the JHPD fully embraces the goal with the hope of exceeding it.

Policy Number and Title	Comment	Disposition
302 Recruitment & Selection	<p>Thanks for the opportunity to submit feedback.</p> <p>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.</p>	Adopted: Addressed in Procedures II (A).
302 Recruitment & Selection	<p>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;</p>	Adopted: Addressed in Directive #106, Fair and Impartial Policing Procedures V (A).
302 Recruitment & Selection	<p>Each section represents an opportunity to reinforce principles of equity and anti-racism. This section could be stronger by adding requirements for: (2) candidate's satisfactory completion and performance on anti-bias training tests (e.g., Shoot-no-shoot training; Implicit Association Tests, or others);</p>	Original Language Retained: This will be covered in training.
302 Recruitment & Selection	<p>Each section represents an opportunity to reinforce principles of equity and anti-racism. This section could be stronger by adding requirements for: (3) stipulating a role for an "equity officer" within the Department;</p>	Original Language Retained: The Office of Diversity and Inclusion will perform this function for JHPD.
302 Recruitment & Selection	<p>Each section represents an opportunity to reinforce principles of equity and anti-racism. This section could be stronger by adding requirements for: (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</p>	Adopted: Addressed in Procedures II (G).
302 Recruitment & Selection	<p>302, pg. 5 - 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.</p> <p>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?</p> <p>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.</p>	Adopted: Addressed in Procedures II (G).

Policy Number and Title	Comment	Disposition
302 Recruitment & Selection	<p>302, pg. 6 - III. Minimum Qualifications for Employment</p> <p>A. Police Officer - JHPD has identified the following minimum qualifications for all applicants for the officer position. This list includes the qualifications necessary to achieve certification by the Maryland Police and Correctional Training Commission (MPCTC) regulations, Code of Maryland Regulations (COMAR) 12.04.01.04, requiring that police officers in Maryland:</p> <ul style="list-style-type: none"> · Are age 21 or older at the time of provisional certification by MPCTC · Are a United States citizen; or o Are a permanent legal resident of the United States who is an honorably discharged veteran of the United States Armed Forces and has submitted an application for United States citizenship that is pending approval. · Possess and submit a high school diploma, GED certificate, or college degree · Eligible under federal and Maryland law to possess and use a handgun · Hold a valid driver's license · --compensated -Have no tattoos and intentional body mutilation, branding, or intentional scarring visible on the face. · Have successfully completed the selection process as described in the "Steps in the Selection Process" section of this Directive. <p>B. Other Personnel - The minimum qualifications for positions other than officer are unique to the knowledge, skills, and abilities required of each individual position. Therefore, the minimum qualifications for each position, including volunteers, shall be identified in the job posting specific to that position.</p> <p>Nothing here about language skills. Need to include:</p> <ul style="list-style-type: none"> - requirement for English literacy - how proficiency in other languages will be --recruited for --verified 	Adopted: Addressed in Procedures III (A) and II (C).
302 Recruitment & Selection	<p>Dear Branville G. Bard Jr. ,</p> <p>As the son of a retired homicide detective, the nephew of various law enforcement officers, and the brother of another, I am intimately familiar with what law enforcement officers face in the day-to-day performance of their duties. I also know that some of the biggest challenges an officer faces are related to cultural misunderstandings between members of the police force and members of the community they are charged with protecting.</p>	<p>Original Language Retained: JHPD's recruiting plan is focused on hiring candidates from diverse backgrounds to serve our diverse community. Requiring a bachelor's degree as a condition for hiring would create an unnecessary barrier to employment for otherwise qualified candidates who possess the experience and maturity of the type of candidates JHPD seeks.</p>

Policy Number and Title	Comment	Disposition
	<p>...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.</p>	
<p>302 Recruitment & Selection</p>	<p>Message in advocacy of hiring newly hired personnel with a bachelor's degree and focusing on diversity in the JHPD police force. A bachelor's degree is a valuable asset for any police officer, and the JHPD should require it for all newly hired personnel. A college education provides officers with the critical thinking, problem-solving, and communication skills they need to succeed in the complex and challenging field of law enforcement. It also exposes them to a wide range of perspectives and experiences, which can help them better understand and serve the diverse communities they protect. In addition to requiring a bachelor's degree, the JHPD should also make a special focus on hiring officers from diverse backgrounds. A diverse police force is more reflective of the community it serves, and it is better equipped to understand and address the unique challenges faced by different groups of people. It is also important to note that a diverse police force is more likely to be viewed as legitimate and trustworthy by the community....A diverse and well-educated police force is essential to the JHPD's mission to protect and serve the community. By requiring a bachelor's degree for all newly hired personnel and making a special focus on hiring officers from diverse backgrounds, the JHPD can ensure that it has the best possible team to serve the people of Baltimore.</p>	<p>Original Language Retained: JHPD's recruiting plan is focused on hiring candidates from diverse backgrounds to serve our diverse community. Requiring a bachelor's degree as a condition for hiring would create an unnecessary barrier to employment for otherwise qualified candidates who possess the experience and maturity of the type of candidates JHPD seeks.</p>
<p>302 Recruitment & Selection</p>	<p>It's not part of an effort if it is a requirement.</p>	<p>Adopted: Addressed in Procedures II (B).</p>
<p>302 Recruitment & Selection</p>	<p>COMAR 12.05.01.15 doesn't exist. They mean COMAR 12.04.01.15.</p>	<p>Adopted: Addressed in Procedures IV (R).</p>
<p>302 Recruitment & Selection</p>	<p>This is NOT what this does. Md. Code Ann., Health Occupations § 1-102 provides the ability for health occupations to establish health occupation boards. It also states that health occupations should be regulated and controlled.</p>	<p>Original Language Retained: This definition is taken from MD Code Regs. 12.04.01.01 (14) Mental Health Professional.</p> <p>(a) "Mental health professional" means an individual who is certified by the appropriate health occupations board, as provided by the Health Occupations Article, § 1-102, Annotated Code of Maryland, and licensed to practice:</p> <ul style="list-style-type: none"> (i) Medicine; (ii) Psychology; (iii) Clinical social work; or (iv) Clinical professional counseling. <p>(b) "Mental health professional," unless specifically stated otherwise in this chapter, includes an individual referred to as a:</p>

Policy Number and Title	Comment	Disposition
		<p>(i) Psychiatrist licensed to practice medicine as defined in Health Occupations Article, § 14-101, Annotated Code of Maryland;</p> <p>(ii) Psychologist licensed to practice psychology as defined in Health Occupations Article, § 18-101, Annotated Code of Maryland;</p> <p>(iii) Licensed certified social worker-clinical authorized to practice clinical social work as defined in Health Occupations Article, § 19-101, Annotated Code of Maryland; or</p> <p>(iv) Certified professional counselor licensed to practice clinical professional counseling as defined in Health Occupations Article, § 17-101, Annotated Code of Maryland.</p>
302 Recruitment & Selection	§ 14-101 is NOT about psychiatrists.	<p>Original Language Retained: This definition is taken from MD Code Regs. 12.04.01.01 (14) Mental Health Professional.</p> <p>(a) “Mental health professional” means an individual who is certified by the appropriate health occupations board, as provided by the Health Occupations Article, § 1-102, Annotated Code of Maryland, and licensed to practice:</p> <p>(i) Medicine;</p> <p>(ii) Psychology;</p> <p>(iii) Clinical social work; or</p> <p>(iv) Clinical professional counseling.</p> <p>(b) “Mental health professional,” unless specifically stated otherwise in this chapter, includes an individual referred to as a:</p> <p>(i) Psychiatrist licensed to practice medicine as defined in Health Occupations Article, § 14-101, Annotated Code of Maryland;</p> <p>(ii) Psychologist licensed to practice psychology as defined in Health Occupations Article, § 18-101, Annotated Code of Maryland;</p> <p>(iii) Licensed certified social worker-clinical authorized to practice clinical social work as defined in Health Occupations Article, § 19-101, Annotated Code of Maryland; or</p> <p>(iv) Certified professional counselor licensed to practice clinical professional counseling as defined in Health Occupations Article, § 17-101, Annotated Code of Maryland.</p>
302 Recruitment & Selection	If they can't get a certification under MPTC, then why spell it out here in JH policy? That is for MPTC to identify and document.	<p>Original Language Retained: The JHPD has to complete the Application for Certification (AFC) for each police officer it hires to obtain certification. The AFC is submitted to the Maryland Police Training and Standards Commission.</p>
302 Recruitment & Selection	COMAR 12.05.01.15 doesn't exist.	Adopted: Addressed in Procedures IV (R).
302 Recruitment & Selection	They mean COMAR 12.04.01.15.	Adopted: Addressed in Procedures IV (R).
302 Recruitment & Selection	Under the same section, the seventh bullet point also needs to be part of the minimum requirements and not an afterthought in the disqualifications section.	Adopted: Addressed in Procedures III (A).

Policy Number and Title	Comment	Disposition
302 Recruitment & Selection	This isn't written to be a policy. Should be revised.	Adopted: Addressed in Policy section.
302 Recruitment & Selection	The HR Director is considered the CEO of the department (for CALEA purposes)?	Adopted: Addressed in Procedures II (G).
302 Recruitment & Selection	<p>This isn't even all of what BPD requires of their potential officers. They include:</p> <ul style="list-style-type: none"> -Can pass a comprehensive background check; Has not had a DWI/DUI conviction within the last 24 months; -Has a good driving record with no more than five points; -Has been Honorably Discharged, if they served in the military; -Has no felony convictions; -Is not currently on parole or probation; -Has had any misdemeanor charges expunged; -Has not illegally used a controlled dangerous substance, narcotic drug or marijuana for any purpose for three or more years; or less than three years, but not less than 12 months, on the condition that the applicant agrees to complete an annual substance abuse test during the two years following the applicant's date of initial certification; -Can pass a mental and physical examination; and -Is, above all, truthful throughout the hiring process. 	Adopted: Addressed in Procedures III (A). The outlined requirements were covered by the certification requirements, but policy has been edited for clarity.
302 Recruitment & Selection	This needs to be up in the minimum requirements for applicants, not in the disqualification subtitle!	Adopted: Addressed in Procedures V (B) – An applicant may not have a DWI/DUI conviction within the last 2 years.
302 Recruitment & Selection	Why isn't this part of the minimum requirements? So much of this list of "reasons why you're disqualified" could be handled if it were upfront in the initial minimum qualifications and requirements.	Adopted: Addressed in Procedures III and V.
302 Recruitment & Selection	This is already in the minimum qualifications and wouldn't need to be reiterated here.	Adopted: Addressed in Procedures III and V.
302 Recruitment & Selection	Kind of odd that JH wouldn't submit for it so that there is uniformity, but ok, I guess.	No Actionable Recommendation.
302 Recruitment & Selection	<p>Recruitment & Selection, JHPD Policy #302</p> <p>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).</p>	Original Language Retained: The use of truth verification for past drug use is mandated by State law (COMAR Md. Code Regs. 12.04.01.16). As this is a regulatory requirement, the JHPD is not at liberty to alter it in this policy.

Policy Number and Title	Comment	Disposition
302 Recruitment & Selection	<p>Under Definitions, Mental Health Professional, lists Md. Code Ann., Health Occupations § 1-102 as being the statute that provides an individual the ability to be certified through a health occupations board. This is not what this does. Md. Code Ann., Health Occupations § 1-102 provides the ability for health occupations to establish health occupation boards. It also states that health occupations should be regulated and controlled.</p> <p>Within that same definition, Md. Code Ann., Health Occupations § 14-101 is not about psychiatrists.</p>	<p>Original Language Retained: This definition is taken from MD Code Regs. 12.04.01.01 (14) Mental Health Professional.</p> <p>(a) “Mental health professional” means an individual who is certified by the appropriate health occupations board, as provided by the Health Occupations Article, § 1-102, Annotated Code of Maryland, and licensed to practice:</p> <ul style="list-style-type: none"> (i) Medicine; (ii) Psychology; (iii) Clinical social work; or (iv) Clinical professional counseling. <p>(b) “Mental health professional,” unless specifically stated otherwise in this chapter, includes an individual referred to as a:</p> <ul style="list-style-type: none"> (i) Psychiatrist licensed to practice medicine as defined in Health Occupations Article, § 14-101, Annotated Code of Maryland; (ii) Psychologist licensed to practice psychology as defined in Health Occupations Article, § 18-101, Annotated Code of Maryland; (iii) Licensed certified social worker–clinical authorized to practice clinical social work as defined in Health Occupations Article, § 19-101, Annotated Code of Maryland; or (iv) Certified professional counselor licensed to practice clinical professional counseling as defined in Health Occupations Article, § 17-101, Annotated Code of Maryland.
302 Recruitment & Selection	<p>Cannabis/marijuana is listed as part of this policy. This policy hasn’t been revisited since recreational cannabis became legal in Maryland. This needs to be updated.</p>	<p>Original Language Retained: This is covered under MD Code 12.04.01.16.</p>
302 Recruitment & Selection	<p>This policy incorrectly lists hallucinogens, heroin, PCP, and LSD as not being considered as controlled dangerous substances. These are all considered to be controlled dangerous substances.</p>	<p>Original Language Retained: There are specific indications of non-recreational drug use, which is why they are separated. See MD Code 12.04.01.16(D)(1).</p>
302 Recruitment & Selection	<p>Under Policy, this is not a policy. It is a policy statement. It needs to be rewritten to be a policy.</p>	<p>Adopted: Addressed in Policy.</p>
302 Recruitment & Selection	<p>Under Proc, IV. Steps in the Selection Process, Q. Step #9 - Physical Evaluation & Drug Screening, COMAR 12.05.01.15 is cited. COMAR 12.05.01.15 does not exist.</p>	<p>Adopted: Addressed in Procedures IV (R).</p>
302 Recruitment & Selection	<p>Under Procedures, VI. Disqualification of Applicants, B., third bullet point, starting with “Specific requirements...” and the remaining part of the bullet point needs to be in the section regarding minimum qualifications. If these aren’t being stated as minimum qualifications, then they should not be listed as reasons for disqualification.</p> <p>Under the same section, the fifth bullet point regarding certification under MPTC standards is not for JHPD to spell out in their policy. The bullet point should only be “The applicant is ineligible for officer certification under MPTC standards”.</p>	<p>Original Language Retained: There are specific indications of non-recreational drug use, which is why they are separated. See MD Code 12.04.01.16(D)(1).</p>

Policy Number and Title	Comment	Disposition
302 Recruitment & Selection	Pg. 11, truth verification. Unless CALEA requires a polygraph, I would not subject applicants to it. If one is required, this must be made explicitly clear to applicants in the job ad and the recruiting process. No research has ever supported the validity of polygraphs (in fact it's shown the opposite, science does not support them having any accuracy), and they have been trying to get them out of the federal government for over a decade. There is a reason polygraphs aren't admissible in a court of law. Willing to talk to Dr Bard and others about this more in depth offline.	Original Language Retained: The use of truth verification for past drug use is mandated by State law (COMAR Md. Code Regs. 12.04.01.16). As this is a regulatory requirement, the JHPD is not at liberty to alter it in this policy.
302 Recruitment & Selection	Pg. 11, drug screening. What will the stance be on marijuana use, particularly medical marijuana? The federal workforce subjected to drug screening is not allowed to use it at all, even if medical. I would make sure this is clarified (whether in this policy or elsewhere deemed appropriate).	Original Language Retained: The marijuana limitation is mandated by State law (COMAR MD Code Regs. 12.04.01.16). As this is a regulatory requirement, The JHPD is not at liberty to alter it in this policy.
302 Recruitment & Selection	Pg. 14. The marijuana policies here need to be made much more clear. Are we talking about federal law? If so, ANY marijuana use is illegal, even medical marijuana. Also, I would caution against using a blanket "cannot ever" for things. Kids experiment in high school and college. Recent use is what matters. This is even stricter than federal employment standards. Willing to also discuss this more offline. Also, how will you handle if someone was dosed with something without their knowledge or non-consensually?	Original Language Retained: The marijuana limitation is mandated by State law (COMAR MD Code Regs. 12.04.01.16). As this is a regulatory requirement, The JHPD is not at liberty to alter it in this policy.
302 Recruitment & Selection	Pg 1: "reflects the diverse community it serves to the degree possible", is this the maximum degree possible? If so, state that.	Adopted: Addressed in Policy Statement.
302 Recruitment & Selection	Pg. 2, recruitment plan, rephrase "aggressive recruitment" to "vigorous recruitment" or "dynamic recruitment" due to aggressive possibly having a negative connotation when associated with police	Adopted: Addressed in Procedures II (A).
302 Recruitment & Selection	Pg. 7, min quals for police officer, states "Have no tattoos and intentional body mutilation, branding, or intentional scarring visible on the face". Is this a requirement of the MPCTC? Is accommodation made for cultural or religious body modifications or tattoos (example tribal tattoos)?	Adopted: Addressed in Procedures III (A).
302 Recruitment & Selection	Pg. 9, written testing. There is no mention of testing accommodations and it even seems to imply that accommodations wouldn't be allowed "All tests will be administered uniformly to all candidates and in accordance with the instructions provided by the vendor or test administrator". I would rethink this position. There are disabilities that would not impact cognitive ability or fitness for duty, but could impact testing abilities (dyslexia and dysgraphia come to mind, there are others as well).	Adopted: Addressed in Procedures IV (K).

Policy Number and Title	Comment	Disposition
302 Recruitment & Selection	<p>Pg. 10, panel interviewer distribution requirements. This appears to be attempting to establish a duly constituted board. However, there are typically diversity requirements for hiring and career progression boards. In federal agencies, duly constituted boards must contain a female member and a minority member. This helps ensure decisions aren't biased.</p>	Adopted: Addressed in Procedures IV (N).
302 Recruitment & Selection	<p>Pg. 14, repeats the "No tattoos and intentional body mutilation, branding, or intentional scarring may be visible on the face." same comments as above. Is this necessary and will accommodation be made for religious and cultural markings?</p>	Adopted: Addressed in Procedures V (B).
302 Recruitment & Selection	<p>Someone should not be hired if they have previously been fired from a different police department for misconduct.</p> <p>Candidates should undergo implicit bias assessments and psychological assessments in the initial screening. Scores for this should be reported to the hiring team.</p> <p>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.</p>	Adopted: Addressed in Procedures V (B), and IV (S).
302 Recruitment & Selection	<p>I'd like to understand if there is parity between the 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.</p>	No Actionable Recommendation.
302 Recruitment & Selection	<p>I'd suggest an addition regarding the preparation of panelists and interview committee members to effectively (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 ODI provides?</p>	Adopted: Addressed in Procedures IV (N).
302 Recruitment & Selection	<p>How are you going to ensure candidates with a history of misconduct at other police departments are not hired?</p>	Reflected: JHPD Directive #303, Background Investigations, details the process for ensuring those selected to work at the JHPD is aligned with the institution's mission, vision, and guiding principles.
303 Background Investigations	<p>Made this it's own letter because "B." deals with being dishonest, using excessive force, or racially profiling individuals. Whereas "C." is regarding discrimination, harassment, and sexual misconduct.</p>	Adopted: Addressed in Procedures IV (C).
303 Background Investigations	<p>I updated the formatting of this because it wasn't clear why "Non-sworn civilians" is under the blanket statement, "The assigned investigator..." and COMAR 12.04.01.05 doesn't apply to non-sworn civilians. How it was formatted previously didn't make sense and wasn't accurate.</p>	Adopted: Addressed in Procedures II (B).

Policy Number and Title	Comment	Disposition
303 Background Investigations	This is all MPTC procedure and should be explained by MPTC in their policies and procedures. Not necessary to have it here.	Adopted: Addressed in Procedures II (A).
303 Background Investigations	COMAR 12.04.01.01-16 isn't only governing police certification; .09-.14 are training standards.This should be updated to reflect the correct Chapters of COMAR that are relevant to police certification.	Adopted: Addressed in Procedures IV (A).
303 Background Investigations	This isn't the only regulations that are cited in this policy...	Adopted: Addressed in Related Resources.
303 Background Investigations	This is duplicative since it is already stated that a copy of the HS diploma AND transcripts are required.	Original Language Retained: In reference to Procedures II (A), the provision is not duplicative and is meant to list acceptable documentation when a diploma is not available.
303 Background Investigations	This is duplicative since it is already stated that a copy of the college diploma AND transcripts are required.	Original Language Retained: In reference to Procedures II (A), the provision is not duplicative and is meant to list acceptable documentation when a diploma is not available.
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.	Adopted: Addressed in Procedures IV (E).
303 Background Investigations	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.	Adopted: Addressed in Procedures II (A) and IV (D).
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.	Reflected: JHPD Directive #302, Recruitment & Selection, cross-references this policy where appropriate.
303 Background Investigations	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.	Original Language Retained: The JHPD is committed to hiring individuals whose backgrounds align with the Mission, Vision, and Core Principles of the University, Public Safety, and JHPD. Relegating the candidate selection process to an outside agency risks compromising this goal. While partnerships with outside agencies for some steps in the hiring process do occur, an overall assessment of the suitability of the candidate for hire needs to be performed by personnel directly affiliated with the JHPD and the University.

Policy Number and Title	Comment	Disposition
303 Background Investigations	Cannabis/marijuana has not been updated since becoming medically and recreationally legal in the State of Maryland.	Original Language Retained: The marijuana limitation is mandated by State law (COMAR MD Code Regs. 12.04.01.16). As this is a regulatory requirement, the JHPD is not at liberty to alter it in this policy.
303 Background Investigations	<p>This is incredibly invasive. If the personnel had access to money, okay, maybe this would be valid, but they don't. Want them to do a financial disclosure?</p> <p>Sure. Want to run a credit check? Fine. But investigating past credit histories and bankruptcy is over the top.</p>	Original Language Retained: The investigation of current and past credit histories is required for background investigations for police officer applicants by the Maryland Police Training and Standards Commission.
303 Background Investigations	Also, a credit report is already noted in the items needed for the investigation. This is duplicative and invasive.	Adopted: Addressed in Procedures II (B).
303 Background Investigations	<p>When the criminal records of candidates for work as JHPD offers are being investigated, a no-tolerance policy for acts of violence of any kind, and in particular, for domestic violence, should be adopted. Even if the acts are classified as misdemeanors for which a sentence of less than a year would be imposed, they should immediately disqualify a candidate for employment. Candidates with prior employment as law enforcement officers should not be considered if they resigned in the course of an investigation of a case in which they were involved unless the subsequent investigation absolves them of any misconduct.</p>	Adopted: Addressed in Procedures IV (C).
303 Background Investigations	<p>I get what JH is trying to say here, but I don't think it is appropriate to be in the "Definitions" for this policy. It should be under "IV. Candidate Disqualification" since it is a reason for disqualification.</p>	Adopted: Addressed in Definitions and Procedures IV (B).
303 Background Investigations	COMAR 12.04.01.01 are the "Definitions". This needs to be corrected.	Adopted: Addressed in Procedures I (H).
303 Background Investigations	<p>Same as above, BUT the "use" of steroids? I mean, I've used steroids that were prescribed to me before. Would that then disqualify me from being a candidate? Steroids are prescribed a lot. This should be more specific.</p>	Adopted: Addressed in Procedures IV (B).
303 Background Investigations	Also, "Abuse of alcohol"-- does this mean they are in AA, or that they have a DUI?	Adopted: Addressed in Procedures IV (B).
303 Background Investigations	Also, what constitutes a "Negative employment history"?	Adopted: Addressed in Procedures IV (B).
303 Background Investigations	Very nice.	No Actionable Recommendation.
303 Background Investigations	This should be reconsidered since use, sale, AND distribution is pretty specific. Maybe, "use and sale, or distribution of..."?	Adopted: Addressed in Procedures IV (B).

Policy Number and Title	Comment	Disposition
303 Background Investigations	<p>Thank you for the opportunity to submit comments. These policies on background investigations cover a lot of ground, but I do not see a specific review of all past disciplinary records, with the (required) consent of the applicant. If I missed this, I apologize for the oversight. If it is not in the policy, i would recommend its inclusion.</p>	Adopted: Addressed in Procedures II (A).
303 Background Investigations	<p>Also, the section on social media is about privacy protection. it seems like this should be stronger, explaining that prospective police officers must disclose all their social media accounts and handles, as well as any closed groups they are a part of (which might, for example, be groups that have values deeply offensive to JHU). It should explain the review of social media -- whether the groups are offensive or any of the public posts are offensive.</p>	Adopted: Addressed in Procedures II (A).
303 Background Investigations	<p>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.</p>	Adopted: Addressed in Procedures IV (B).
303 Background Investigations	<p>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 very 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 damages." How will this be handled should an officer from Delaware apply for a job with the JHPD?</p>	Adopted: Addressed in Procedures II (A) and IV (E).
303 Background Investigations	<p>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. I feel that the university would make a much better investment in community safety by funneling all funds dedicated to policing into the community instead.</p>	Adopted: Addressed in Procedures II (A) and IV (E).

Policy Number and Title	Comment	Disposition
	<p>I consider all feedback I provide on policies to be a form of harm-reduction. For 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. Given that in the most public and horrifying incidences of police violence there were multiple prior incidences of civilian complaints against the offending officer, this must be taken into account during the hiring procedures. The question must be asked of the most recent supervisor (and not just candidate- supplied references).</p> <p>https://theconversation.com/police-officers-accused-of-brutal-violence-often-have-a-history-of-complaints-by-citizens-139709</p>	
305 Training & Professional Development	<p>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.</p>	Adopted: Addressed in Procedures V (B).
305 Training & Professional Development	<p>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?***</p>	Adopted: Addressed in Procedures V (B).
306 Field Training & Evaluation Program	<p>In section K, focusing on program evaluation, it talks about "Within 180 days of the conclusion of a FTEP session, the Director of Training for Public Safety will report to the Chief of Police on the coordination and effectiveness of the FTEP. " Is there any outside, third-party evaluation or some type of overseer who will assess the validity and conclusions of the director's report?</p>	Adopted: Addressed in Procedures VI (L).

Policy Number and Title	Comment	Disposition
312 Awards	I applaud the decision to have a Medal of Tactical Deescalation as outlined in Section III.B.	No Actionable Recommendation.
313 Secondary Employment	This appears to include prohibition on “secondary/ outside employment” that involves use of law enforcement authority. If this includes prohibition on secondary employment as off-duty security for private sector? Which appeared to be common practice some places? - If so, consider elaborating that example.	Adopted: Addressed in Procedures II (B).
350 Complaints Against Police Personnel	Definitions: and throughout all policies a) Consider Changing the acronym used for Civilian Review Board (CRB) to BCCRB – This better identifies the BCCRB as a function of Baltimore City. This will help community members better understand complaints processing procedures, which involve several entities.	Original Language Retained: CRB is the acronym used by the Baltimore City Office of Equity and Civil Rights, which oversees the CRB.
350 Complaints Against Police Personnel	This is so important!! And it is in the Code!! Why was it not included?! Suggested text to be added: A police officer may not be denied the right to bring suit arising out of the police officer’s official duties.	Adopted: Addressed in Procedures XI (B).
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.	Adopted: Addressed in Procedures VII (B) and IX (H).
350 Complaints Against Police Personnel	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.	Adopted: Addressed in Definitions.
350 Complaints Against Police Personnel	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 are to perform. Under Procedures, VIII. Classification and Assignment, “C.” and “D.” do not pertain to Classification and Assignment. “C.” belongs under VI. Complainant’s Rights and “D.” belongs under I. General Complaint Procedures.	Adopted: Addressed throughout this policy.

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	The matrix doesn't have "serious misconduct" defined.	Original Language Retained: Serious Misconduct is defined in the Definitions section of the Directive.
350 Complaints Against Police Personnel	Number of complaints issued against each officer should be tracked and this data should be stored. This data should be evaluated regularly when assessing the individual and department's annual performance.	Reflected: JHPD Directive #355, Early Intervention Program, details complaint data tracking and evaluation.
350 Complaints Against Police Personnel	Need to define "IAPro" in "Definitions".	Adopted: Addressed in all JHPD Directives. Both "IApro" and "Blueteam" have been replaced by "record management system."
350 Complaints Against Police Personnel	Complainant should be updated on the status of their complaint in a timely manner (for example if the complaint has been received, being investigated, when the investigation has been completed and what the findings were.)	Adopted: Addressed in Procedures VI.
350 Complaints Against Police Personnel	The Discrimination and Harassment Policy and Procedures link goes to a dead page.	Adopted: Addressed in Procedures VI (G).
350 Complaints Against Police Personnel	Below in the Police Accountability Board (PAB) definition, it is not "BCACC"--that isn't the correct acronym. It needs to be correct and uniform.	Adopted: Addressed in Definitions.
350 Complaints Against Police Personnel	Yes, but no. ACC reviews investigations for the complaints filed with the Police Accountability Board (PAB) and will decide on the disciplinary outcomes.	Adopted: Addressed in Definitions.
350 Complaints Against Police Personnel	"email" is "online"... Does JH mean through the website?	Adopted: Addressed in Definitions.
350 Complaints Against Police Personnel	Shouldn't be in the "Definitions" portion of the policy. Needs to be IN the policy.	Adopted: Addressed in Definitions and Procedures VII.
350 Complaints Against Police Personnel	You can't say, "As defined in..." and then alter the definition...	Adopted: Addressed in Definitions.

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	Yes, and no. PADA is significantly more than that. This either needs to be incredibly more specific or removed from "Definitions" because it is utterly misleading.	Adopted: Addressed in Definitions.
350 Complaints Against Police Personnel	Nope. They do not appoint all five members. PAB appoints two of the civilians and the Chair of PAB is a member of ACC. Also, you can't say "ACC" here, but in the "Definitions" above you have "BCACC"... C'mon, Hopkins.	Adopted: Addressed in Definitions.
350 Complaints Against Police Personnel	This isn't the acronym in the "Definitions".	Adopted: Addressed in Procedures II (D).
350 Complaints Against Police Personnel	What is the difference between "H." and the list of resources under "C."?	Adopted: Addressed in Procedures III (H).
350 Complaints Against Police Personnel	There is NOTHING about the privacy of those who have filed a complaint and those who are accused, but have not yet gone through the investigation process. JH needs to include that information provided regarding a complaint, in writing or verbal, is considered confidential and the receiver of the complaint is to not discuss the complaint with anyone until otherwise instructed.	Adopted: Addressed in Procedures IV (C).
350 Complaints Against Police Personnel	Duplicative.	Adopted: Addressed in Procedures IV (B).
350 Complaints Against Police Personnel	What happens if the supervisor embellishes on the form?	Adopted: Addressed in Procedures V (A).
350 Complaints Against Police Personnel	Need to define "BlueTeam" in the "Definitions".	Adopted: Addressed in all JHPD Directives. Both "IApro" and "Blueteam" have been replaced by "record management system."
350 Complaints Against Police Personnel	Link the webpage.	Adopted: Addressed in Procedures VI (G).

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	This is poor policy. List them out or else it will be subject to interpretation.	Adopted: Addressed in Procedures VII.
350 Complaints Against Police Personnel	Not State's Attorney Office, too?	Adopted: Addressed in Procedures VII (B).
350 Complaints Against Police Personnel	Belongs under VII. PSAU Supervisor or Investigator Actions.	Adopted: Addressed in Procedures VII (C).
350 Complaints Against Police Personnel	This doesn't belong under this subtitle. This isn't about Classification and Assignment...	Adopted: Addressed in Procedures VII.
350 Complaints Against Police Personnel	This isn't true. Md. Code Ann., Public Safety § 3-107 says nothing about the length of time of the emergency suspension as it pertains to the mandatory suspensions of police powers.	Adopted: Addressed in Procedures VII (H).
350 Complaints Against Police Personnel	This is the exactly the opposite of what Md. Code Ann., Public Safety § 3-108 says. § 3-108 is about the Victims' Rights Advocate.	Adopted: Addressed in Procedures VIII.
350 Complaints Against Police Personnel	This is not the name of this Act...It is the Maryland Police Accountability Act of 2021. It includes discipline, but "Discipline" is not in the name of the Act.	Adopted: Addressed in Procedures IX (A).
350 Complaints Against Police Personnel	This belongs under VII. PSAU Supervisor or Investigator Actions.	Adopted: Addressed in Procedures VII (A).
350 Complaints Against Police Personnel	This has nothing to do with this subtitle. It belongs under "I. Specific Procedures for Interviews & Interrogations".	Adopted: Addressed in Procedures IX (H).
350 Complaints Against Police Personnel	Also has nothing to do with this subtitle. It belongs under "I. Specific Procedures for Interviews & Interrogations".	Adopted: Addressed in Procedures IX (H).

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	There is no clause indicating that someone being interviewed or interrogated may seek legal council prior to proceeding with the interview or interrogation. Everyone has the right to legal representation during an interview or investigation.	Adopted: Addressed in Procedures IX (H).
350 Complaints Against Police Personnel	I don't think this is what JH meant...	Adopted: Addressed in Procedures IX (H).
350 Complaints Against Police Personnel	There isn't a great history with breaks being at the investigator(s) discretion.	Adopted: Addressed in Procedures IX (H).
350 Complaints Against Police Personnel	<p>Nope. § 3-105 states that:</p> <ol style="list-style-type: none"> 1. The law enforcement agency shall adopt the State disciplinary matrix for all matters that may result in discipline of a PO. 2. Within 15 days after the ACC issues an administrative charge against a PO, the COP shall offer discipline to the PO who has been charged in accordance with the matrix. 3. The COP may offer the same discipline that was recommended by the ACC or a higher degree within the applicable range of the matrix, but they can't deviate below the discipline recommended by the ACC. 4. If the PO accepts the COP's offer of discipline, then it will be imposed. 5. If the PO doesn't accept, then it will go to the trial board. 6. And at least 30-days before the trial board proceeding begins, the PO will get a copy of the investigatory record, notified of the charges, and notified of the recommended disciplinary action. 	Adopted: Addressed in Procedures X (E).
350 Complaints Against Police Personnel	This should be moved up in this section.	Adopted: Addressed in Procedures X (B).
350 Complaints Against Police Personnel	This is not part of Md. Code Ann., Public Safety § 3-106(b), so why was it under that bulletpoint?	Adopted: Addressed in Procedures X (F).
350 Complaints Against Police Personnel	This section isn't about the PSAU Commander.	Adopted: Addressed in Procedures XII (A).

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	All of this is in Md. Code Ann., Education § 24-1208. Why was it not included in this policy?!	Adopted: Addressed in Procedures XV.
350 Complaints Against Police Personnel	This is NOT the name of this Act!!	Adopted: Addressed in Related Resources - External Documentation.
350 Complaints Against Police Personnel	You could cite it this way, but where is the rest of the citation??	Adopted: Addressed in Related Resources - External Documentation.
350 Complaints Against Police Personnel	OECR has told me that JHPD will not be under CRB. This policy will need to be reviewed to exclude anything regarding CRB. OECR states that JHPD complaints would go to PAB.	Original Language Retained: Per the Community Safety and Strengthening Act, JHPD is subject to the Civilian Review Board.
350 Complaints Against Police Personnel	Where did this definition come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins. Additionally, the definition of Technical Infraction is sourced from MD Code, General Provisions, 4-110.
350 Complaints Against Police Personnel	Here they used the proper acronym.	No Actionable Recommendation.
350 Complaints Against Police Personnel	Duplicative and isn't what the member shall do when they have received a complaint or complaint form.	Original Language Retained: Procedure IV (D) requires officers to carry complaint forms so that they can be equipped to receive complaints at all times.
350 Complaints Against Police Personnel	This is great to see.	No Actionable Recommendation.
350 Complaints Against Police Personnel	Why isn't this under an "Internal Investigations" policy?	Original Language Retained: This directive outlines the JHPD complaint procedure from the initial filing of a complaint through resolution. The procedure is designed to ensure transparency, accountability, and fairness in handling complaints against JHPD personnel.
350 Complaints Against Police Personnel	Who would this be?? And who would organize that??	No Actionable Recommendation.

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	This has nothing to do with policing. It's the Code for DPW...	Original Language Retained: Per the Community Safety and Strengthening Act, JHPD is subject to the Civilian Review Board.
350 Complaints Against Police Personnel	This policy isn't relevant because CRB won't be taking on JHPD issues.	Original Language Retained: Per the Community Safety and Strengthening Act, JHPD is subject to the Civilian Review Board.
350 Complaints Against Police Personnel	The following aren't procedures.	Adopted: Addressed in Procedures IX (I).
350 Complaints Against Police Personnel	<p>There needs to be a stricter and more explicit requirement for the complaints that warrant suspension without pay beyond just if the Chief or their designee determines. Certain accusations should necessitate suspension without pay such as misconduct, unnecessary use of force, biased discrimination, harassment, refusal to identify their name/badge number to someone requesting, etc. If the investigation finds misconduct has occurred, the officer should be dismissed without possibility for rehiring.</p>	<p>Reflected: This directive tracks the requirement of the Maryland Police Accountability Act of 2021 . All police discipline is determined by the Statewide Model Disciplinary Matrix, which is the required framework through which all matters of discipline will be imposed as a result of a sustained disposition from an administrative investigation into an officer's misconduct. The purpose of this Disciplinary Matrix is to apply disciplinary standards in a fair, equitable, and consistent manner statewide.</p>
350 Complaints Against Police Personnel	<p>350, pg. 7</p> <p>III. Methods for Making Complaints (CALEA 26.2.4)</p> <p>A. The public and members of JHPD can obtain paper complaint forms from any JHPD supervisor as well as from all Johns Hopkins Public Safety (JHPS) buildings across campus and central hubs, to include all campus libraries.</p> <p>COMMENTS: The need to ask a supervisor for a complaint card may suppress complaints. Will there be public postings of means of complaint at public safety desks/stations? In English and Spanish and other languages as relevant?</p> <p>C. Complaints can be made online or by email through the following avenues:</p> <ul style="list-style-type: none"> · General misconduct: <ul style="list-style-type: none"> o JHPD's website (https://publicsafety.jhu.edu/communitsafety/jhpd/) o PAB's webpage (https://civilrights.baltimorecity.gov/intake-form) o CRB's website (https://civilrights.baltimorecity.gov/civilianreview-board/file) o Via email (JHPDcomplaints@jh.edu) <p>COMMENTS:</p> <ul style="list-style-type: none"> -- 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 	Adopted: Addressed in Procedures III (A).

Policy Number and Title	Comment	Disposition
	<p>· 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.</p> <p>· CRB website does have Spanish version of complaint form Complaints of discrimination or harassment and/or related retaliation can be submitted to OIE via phone (410) 516-8075, e-mail (oie@jhu.edu) or via the online form: Protected Category Discrimination and Harassment Report Johns Hopkins University Advocate GME System (symplicity.com)</p> <p>COMMENTS: There are JH employees in various positions with very marginal English proficiency - just enough to get through HR processes. Might consider this form in Spanish even though it's for employees.</p>	
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).	Adopted: Addressed in Procedures XV (B).
350 Complaints Against Police Personnel	<p>The disciplinary suspension part is a little unclear to me, though I am sure there's a whole plethora of details regarding the different punishments listed: "A penalty is imposed by the Chief of Police or their designee for the violation of any JHPD directives, rules, regulations, policies, or any local, state, or federal laws. a) Depending on the circumstances, the suspension may be with or without pay. b) The suspension may include a prohibition against approved secondary employment that requires the offduty officer to have police authority.</p> <p>To me, it seems like the chief of police determines the extent of certain punishments and while I don't find anything wrong with that, I feel like there could be some controversy with this (i.e. finding favor with the chief and having paid time off for something more serious than not)</p>	Reflected: Procedures X details the disciplinary process.
350 Complaints Against Police Personnel	Really good detailed outline of the whole investigation process with specific sections dedicated to the before, during, and concluding parts of the process	No Actionable Recommendation.
350 Complaints Against Police Personnel	For trial boards, "An officer of equal rank to the officer who is accused of misconduct appointed by the JHPD Chief of Police." Would there not be a conflict of interest if they work together	Adopted: Addressed in Procedures X (F).

Policy Number and Title	Comment	Disposition
350 Complaints Against Police Personnel	<p>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 not 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 please do not hesitate to contact me.</p>	<p>Adopted: Addressed in JHPD Directive #208: Uniforms & Equipment, Procedures III (J).</p>
351 Nonpunitive Corrective Action	<p>Policy 351 (along with 350 and 407 I believe) refers to a Public Safety Accountability Unit. I see no policy that states the members of this unit and how the membership of this unit is selected.</p>	<p>Adopted: Addressed in Definitions. Additionally, JHPD Directive #350, Complaints Against Police Personnel, defines Public Safety Accountability Unit as: "An independent investigative unit of the Office of Hopkins Internal Audits that conducts investigations and assessments of incidents and complaints related to the use of force and misconduct."</p>
352 Expedited Resolutions of Minor Violations	<p>This policy is a complete violation of Maryland regulations. Pursuant to COMAR 12.04.10, the Uniform State Disciplinary Matrix is required for all matters that may result in discipline of a police officer, and the imposition of discipline shall not be influenced by the high- or low-profile nature of the police misconduct.</p>	<p>Original Language Retained: Through comprehensive review and based on research and benchmarking with peer departments, JHPD directives regularly exceed the minimum legal requirements.</p> <p>JHPD supports the proper application of the Uniform State Disciplinary Matrix. While the Matrix's purpose is to ensure uniformity in discipline, the Matrix does not strictly mandate a specific penalty for each violation category. Instead, with the various categories, there are ranges of penalties that can increase or decrease based on aggravating and mitigating factors. JHPD Directive #352, Expedited Resolution of Minor Violations, applies only to Category A of the Statewide Police Disciplinary Matrix where minimal investigation and adjudication are required, the officer does not contest the allegations, and where the alleged violation does not involve a member of the public (i.e., violation associated with improper attire and grooming (uniformed/non-uniformed), late for duty assignment, failure to properly care for agency vehicle, including but not limited to vehicle inspection and maintenance care, loss of agency property (excluding weapon and radio), and parking violations, only).</p> <p>This directive is consistent with the Matrix, which permits the lowest level of disciplinary proceedings for "conduct that has or may have a minimal negative impact on operations or professional image of the law enforcement agency." JHPD Directive #352 will only be used as a mechanism to efficiently resolve cases alleging minor internal misconduct where extensive investigation and adjudication are unnecessary and not required by the Matrix. For these reasons, we are confident that JHPD Directive #352, as well as our other related directives, do not violate Maryland law.</p> <p>It is worth noting that JHPD Directive #352 was modeled after Baltimore Police Department (BPD) Policy #321, Expedited Resolution of Minor Violations, which was adopted during the consent decree process. According to BPD's policy, BPD utilizes an Early Resolution process for certain categories of misconduct cases that do not implicate allegations pertaining to conduct or performance involving a member of the public.</p>
353 Disciplinary Matrix	<p>If it's not already in another section, I think this should include required annual reporting of police disciplinary actions.</p>	<p>Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.</p>

Policy Number and Title	Comment	Disposition
353 Disciplinary Matrix	This is not what it is called...Come on, Hopkins.	Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.
353 Disciplinary Matrix	Why is JHPD incorrectly restating the Maryland Statewide Disciplinary Matrix in its own policy? Of the schools listed and the Baltimore Police Department refer to the Matrix and provide a link to it. At no point have they rewritten the Matrix into a policy, let alone do so incorrectly.	Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.
353 Disciplinary Matrix	These should have been directly copied from the Md. Code Ann. Why weren't they??	Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.
353 Disciplinary Matrix	JH needs to just add the Statewide Disciplinary Matrix document to the rest of this, just like other agencies do. There is no point in rewriting the document. Waste of time, effort, and personnel. It can also be misconstrued when rewritten.	Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.
353 Disciplinary Matrix	Based on the Maryland Statewide Disciplinary Matrix, *****expedited resolution - update an "expedited resolution for minor misconduct" is appropriate. That entire policy is against the law.	<p>Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.</p> <p>Additionally, through comprehensive review and based on research and benchmarking with peer departments, JHPD directives regularly exceed the minimum legal requirements.</p> <p>JHPD supports the proper application of the Uniform State Disciplinary Matrix. While the Matrix's purpose is to ensure uniformity in discipline, the Matrix does not strictly mandate a specific penalty for each violation category. Instead, with the various categories, there are ranges of penalties that can increase or decrease based on aggravating and mitigating factors. JHPD Directive #352, Expedited Resolution of Minor Violations, applies only to Category A of the Statewide Police Disciplinary Matrix where minimal investigation and adjudication are required, the officer does not contest the allegations, and where the alleged violation does not involve a member of the public (i.e., violation associated with improper attire and grooming [uniformed/non-uniformed], late for duty assignment; failure to properly care for agency vehicle, including but not limited to vehicle inspection and maintenance care; loss of agency property [excluding weapon and radio], and parking violations, only).</p> <p>This directive is consistent with the Matrix, which permits the lowest level of disciplinary proceedings for "conduct that has or may have a minimal negative impact on operations or professional image of the law enforcement agency." JHPD Directive #352 will only be used as a mechanism to efficiently resolve cases alleging minor internal misconduct where extensive investigation and adjudication are unnecessary and not required by the Matrix. For these reasons, we are confident that JHPD Directive #352, as well as our other related directives, do not violate Maryland law.</p> <p>It is worth noting that JHPD Directive #352 was modeled after Baltimore Police Department (BPD) Policy #321, Expedited Resolution of Minor Violations, which was adopted during the consent decree process. According to BPD's policy, BPD utilizes an Early Resolution process for certain categories of misconduct cases that do not implicate allegations pertaining to conduct or performance involving a member of the public.</p>

Policy Number and Title	Comment	Disposition
353 Disciplinary Matrix	<p>I do not support the creation of the JHPD. However, as an affiliate, it is my responsibility to mitigate the harm that the creation of the JHPD will have upon our affiliates and communities.</p> <p>In this policy under Procedures section I. General it states "Discipline is imposed for first violations and may follow a progressive course for repeat or increasingly serious offenses." This is outrageous. Repeat or increasingly serious offenses should always follow a progressive course. We must hold JHPD officers accountable since it has been repeatedly promised that this new police department will be beyond reproach.</p>	<p>Adopted: JHPD Directive #353, Disciplinary Matrix, has been incorporated into JHPD Directive #350, Complaints Against Police Personnel, which details investigations and disciplinary measures in response to officer violations.</p>
354 Civilian Review Board Complaint Procedures	<p>354, pg. 3</p> <p>I. Required Actions</p> <p>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.</p> <p>COMMENTS: Information about how to contact these agencies in languages other than English will need to be available & updated annually.</p>	<p>Adopted: Addressed in Procedures I (A).</p>
354 Civilian Review Board Complaint Procedures	<p>I do not support the creation of the JHPD. However, as an affiliate, it is my responsibility to mitigate the harm that the creation of the JHPD will do to our school and communities. In this policy under Procedures section I. Required Actions point L. it states "If there is no agreement, the Police Chief or a designee will review both findings and make a final decision." However, the Police Chief or a designee of the Police Chief has a conflict of interest because the Police Chief is a member of the police department and will therefore want to exonerate the member of their department. There should be someone outside of the police department who will review both the CRB and PSAU findings and come to an unbiased decision.</p>	<p>Adopted: Addressed in Procedures I (L).</p>
354 Civilian Review Board Complaint Procedures	<p>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 of each board will be released to the public.</p>	<p>No Actionable Recommendation.</p>
401 De-Escalation	<p>Not the name of the policy.</p>	<p>Adopted: Addressed in Related Resources.</p>
401 De-Escalation	<p>De-escalation to De-Escalation</p>	<p>Original Language Retained: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.</p>

Policy Number and Title	Comment	Disposition
401 De-Escalation	No, no, not as described by JHPD policy, as it states in the First Amendment.	Original Language Retained: Guiding Principle IV reflects JHPD's prohibition against retaliatory force used on persons engaged in acts of expression protected by the First Amendment.
401 De-Escalation	This should be in the "Definitions", not within the policy.	Original Language Retained: The Definitions section defines de-escalation techniques in general, and Procedures II (D) describes various verbal de-escalation techniques.
401 De-Escalation	Should be in the "Definitions" portion of the policy.	Original Language Retained: The Definitions section defines de-escalation techniques in general, and Procedures II (D) describes various physical de-escalation techniques.
401 De-Escalation	The following definitions need to be added to "Definitions": Verbal De-Escalation Techniques Refers to strategies for using the substance and manner of speech in a way that defuses and de-escalates situations. In addition to regulating vocal tone and pitch and speaking in a slow, calming voice, members will use the Listen and Explain with Equity and Dignity (LEED) framework to verbally de-escalate. Physical De-Escalation Techniques Seeks to avoid physical confrontation unless immediately necessary to prevent direct harm to others or to stop behavior that may result in serious harm to others.	Original Language Retained: The Definitions section defines de-escalation techniques in general, and Procedures II (D) describes various verbal and physical de-escalation techniques.
401 De-Escalation	Since some of the Core Principles from BPD policy 1107 are being incorporated, they all should be. The ones missing include De-Escalation, Assessment, Reporting Use of Force, Duty to Provide Medical Assistance, and Sound Tactics.	Adopted: Addressed in Core Principles.
401 De-Escalation	Redundant.	Adopted: Addressed in Policy.
401 De-Escalation	Why are only some of BPD Policy 1107 Core Principles used? All should be used.	Adopted: Addressed in Core Principles.
401 De-Escalation	Ones missing: De-Escalation Assessment Reporting Use of Force Duty to Provide Medical Assistance Sound Tactics	Adopted: Addressed in Core Principles.
401 De-Escalation	If the individual is having a mental or behavioral health crisis, the decreasing the risk of harm may be to that individual which isn't reflected here.	Adopted: Addressed in Procedures I (A).

Policy Number and Title	Comment	Disposition
401 De-Escalation	From BPD Policy 1107; added in what was missing. Additional text added: Esure appropriate number of officers respond promptly to an incident;	Adopted: Addressed in Procedures III (H).
401 De-Escalation	Why is this only the first two sentences of BPD Policy 1107 definition?!	Original Language Retained: The definition of "totality of the circumstances" is found in several directives, and the circumstances are not specific to those that are related to use of force.
401 De-Escalation	Not relevant since in the deescalation policy.	Original Language Retained: Including a prohibition against retaliatory force against persons engaged in acts of expression protected by the First Amendment aligns with the principles of de-escalation, ensuring that officers act in a manner that prioritizes safety, fairness, and accountability.
401 De-Escalation	Redundant. Not needed.	Original Language Retained: Including situational guidance aligns with the principles of de-escalation, ensuring that officers act in a manner that prioritizes safety, fairness, and accountability.
401 De-Escalation	This is not pertinent to this policy.	Original Language Retained: Including the duty to provide medical attention in a de-escalation policy underscores JHPD's commitment to protecting the sanctity of life, ensuring humane treatment, and facilitating a prompt medical response.
401 De-Escalation	Including "voluntary" members to the private Johns Hopkins University police force is unduly broad and would make a number of related policies unenforceable, such as any sort of standard of conduct or commitments to JHU's core values as well as publicly held one's. Local police forces have been investigated federally for their lack of discipline and training, and JHU already has active contracts with the Baltimore police, so the inclusion of volunteers seems intentionally ambiguous. I would hope that is not the case, as the reasoning for such a private police force's existence is to be at a higher (or cheaper) level than the one our tax payer dollars already pay for. Further, I would think that any contractual additions to this potential police force would be required to sign specific addendums agreeing to meet the values of JHU's campus policy, individually, and with contractual remuneration to JHU and it's residents in the case of a provable offense as set forth with the stated values and practice of this agency.	Original Language Retained: Including voluntary members in the definition of "member of the police department" helps ensure that all individuals contributing to the department's mission are held to the same high standards and are equipped to perform their roles effectively and responsibly.
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?	Adopted: Addressed in Procedures IV.
401 De-Escalation	ICAT is noted in this policy. However, it is incorrectly cited as having a "De-Escalation Program." ICAT has de-escalation within it, but it is not a "De-Escalation Program."	Adopted: Addressed in Procedures IV (A).

Policy Number and Title	Comment	Disposition
401 De-Escalation	<p>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. I feel that the university would make a much better investment in community safety by funneling all funds dedicated to policing into the community instead.</p> <p>I consider all feedback I provide on policies to be a form of harm-reduction. 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.</p>	Adopted: Addressed in Procedures IV.
402 Use of Force	The levels of use of force are not listed in this policy anywhere. This must be added to the policy.	Adopted: Addressed in Definitions.
402 Use of Force	Under "Definitions", only the first sentence of the definition is there for Totality of Circumstances. The "facts and circumstances may include but are not limited to..." and the list is missing from the definition.	Reflected: Reasonable, Necessary, and Proportional are listed in Definitions.
402 Use of Force	The same applies for JHPD Policy #402 as it did for Policy #401, since some of the Core Principles from BPD Policy 1115 are being incorporated, they should all be. The ones missing include De-Escalation, Assessment, Reporting Use of Force, and Duty to Provide Medical Assistance.	Adopted: Addressed in Core Principles.
402 Use of Force	Under Directives, III. Response to Aggression and Resistance, A. "Officers shall not use non deadly force" is extremely concerning and the entire section needs to re-reviewed.	Original Language Retained: Procedures III aligns with the MD Use of Force statute, MD Code, Public Safety, § 3-524, which states, "A police officer may not use force against a person unless, under the totality of the circumstances, the force is necessary and proportional to (i) prevent an imminent threat of physical injury to a person, or (ii) effectuate a legitimate law enforcement objective."
402 Use of Force	...This is about DoD funding for military activities... what does it have to do with JHPD?	Original Language Retained: The reference to the National Defense Authorization Act of 2013 is correct, as it amended LEOSA.

Policy Number and Title	Comment	Disposition
402 Use of Force	<p>1. Many of these policies depend on 'effectiveness' and 'reasonable officers' but both of those terms have no clear definition and could be abused.</p> <p>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.</p>	Adopted: Addressed in Definitions.
402 Use of Force	Pg 1. Paragraph 3/4. How is effective defined? How is a 'reasonable officer' defined/assessed?	Adopted: Addressed in Definitions.
402 Use of Force	While the reasonable officer standard appears straightforward, the concept of the reasonable officer, as applied in practice has been used to justify the use of force above and beyond that considered appropriate for the preserving peace and order. If the "reasonable officer standard" used here is NOT that used to support the type of policing that generated protest over the past several years, what is that standard and where does it come from?	Adopted: Addressed in Definitions.
402 Use of Force	BPD Policy 1115 definition, but they included the "Devices of Less-Lethal Force" which JH needs to include.	Adopted: Addressed in Definitions.
402 Use of Force	What JH had was from BPD Policy 1115, but missing some; I've added it back in.	Adopted: Addressed in Procedures II and III.
402 Use of Force	MINIMUM! No.	Adopted: Addressed in Procedures VII (E).
402 Use of Force	Why did JH make this overly complicated? The policy is to establish when a member may use force and what their specific duties are throughout the encounter.	Original Language Retained: The Policy Statement aligns with the MD Use of Force statute, MD Code, Public Safety, § 3-524, which states, "A police officer may not use force against a person unless, under the totality of the circumstances, the force is necessary and proportional to (i) prevent an imminent threat of physical injury to a person, or (ii) effectuate a legitimate law enforcement objective."
402 Use of Force	This is exactly what the "Policy Statement" for Policy #401 states...	Original Language Retained: Repeating these values in the policy statement serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
402 Use of Force	Also is exactly what the "Policy Statement" for Policy #401 states...	Original Language Retained: Repeating these values in the policy statement serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
402 Use of Force	Subjective.	Original Language Retained: The phrase "describes the very narrow parameters under which deadly force is authorized" emphasizes that the use of deadly force is highly restricted. This specificity is crucial in ensuring that officers understand the limited circumstances in which they are permitted to use deadly force.

Policy Number and Title	Comment	Disposition
402 Use of Force	NO!! This is Aggravated Aggression straight from BPD Policy 1115 Definitions.	Original Language Retained: The distinction between active aggression and aggravated aggression lies in the severity and immediacy of the threat posed by the aggressor.
402 Use of Force	Where did this definition come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	This is only the first part of BPD Policy 1115 definition of Deadly Force/Lethal Force.	Reflected: The examples are included in the body of Procedures IV (F).
402 Use of Force	Where did this definition come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	Where did this definition come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	Where did this definition come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	Where did this come from??	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	This belongs under "Totality of Circumstances", not under "Reasonable" definition. (Literally comes from BPD Policy 1115).	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	Where did this definition come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
402 Use of Force	WHY IS THERE NO INDICATION OF THE DIFFERENT LEVELS OF USE OF FORCE LIKE IN BPD POLICY 1115.	Adopted: Addressed in Definitions.

Policy Number and Title	Comment	Disposition
402 Use of Force	This isn't a directive. Its an FYI.	Adopted: Addressed in Procedures II (B).
402 Use of Force	Where did this come from?? It is confusing especially with the very first line of "Officers shall not use non-deadly force...".	Original Language Retained: The Policy Statement aligns with the MD Use of Force statute, MD Code, Public Safety, § 3-524, which states, "A police officer may not use force against a person unless, under the totality of the circumstances, the force is necessary and proportional to (i) prevent an imminent threat of physical injury to a person, or (ii) effectuate a legitimate law enforcement objective."
402 Use of Force	WHAT?!?!	Original Language Retained: The Policy Statement aligns with the MD Use of Force statute, MD Code, Public Safety, § 3-524, which states, "A police officer may not use force against a person unless, under the totality of the circumstances, the force is necessary and proportional to (i) prevent an imminent threat of physical injury to a person, or (ii) effectuate a legitimate law enforcement objective."
402 Use of Force	Redundant.	Original Language Retained: Repeating the necessity for verbal warnings serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
402 Use of Force	Redundant.	Original Language Retained: Repeating the need to cease force once the law enforcement objective has been achieved serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
402 Use of Force	Redundant. This is already in the "Definitions" portion of the policy.	Original Language Retained: Repeating these definitions serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
402 Use of Force	Redundant.	Original Language Retained: Clarifying that deadly force is to be used only as a last resort serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
402 Use of Force	Not really needed to be in policy, but should definitely be addressed in training.	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins. Additionally, the JHPD is implementing Integrating Communications, Assessment, and Tactics (ICAT) training, which is an innovative, evidence-based approach to use-of-force training. ICAT provides first responding police officers with the tools, skills, and options they need to defuse a range of critical incidents successfully and safely.

Policy Number and Title	Comment	Disposition
402 Use of Force	This belongs in training, not policy.	<p>Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.</p> <p>Additionally, the JHPD is implementing Integrating Communications, Assessment, and Tactics (ICAT) training, which is an innovative, evidence-based approach to use-of-force training. ICAT provides first responding police officers with the tools, skills, and options they need to defuse a range of critical incidents successfully and safely.</p>
402 Use of Force	MSP stated that LEOSA is only for retiring, retired, and separated officers. Not active.	<p>Original Language Retained: The Law Enforcement Officers Safety Act permits the nationwide carrying of concealed handguns by qualified current and retired law enforcement officers and amends the Gun Control Act of 1968 to exempt qualified current and retired law enforcement officers from state and local laws prohibiting the carry of concealed firearms.</p>
402 Use of Force	<p>Hello, I am glad to see that there is a policy specifically for de-escalation. But I see a large gap in policy between de-escalation and use of force. I believe it is critical for officers to know how to control a violent person without having to resort to an authorized defensive weapon (#403), even if that weapon is non-lethal.</p> <p>Without proper training on how to handle a violent person without using a weapon, officers are at risk of simply defaulting to pepper spray or a baton when that level of force may have been avoided if proper training had been provided. A promising avenue is to train the officers in a specialized form of Brazilian Jiu-Jitsu (BJJ) developed specifically for law enforcement. This course teaches officers how to restrain and control a violent person with the minimal possible force - no punching, kicking, pepper spray, or batons. Specifically, the course Gracie Survival Tactics (GST, <https://www.gracieuniversity.com/Pages/Public/Informationpages/graciesurvivaltactics2>) has been shown to reduce injuries to both officers and community members. Additionally, the money saved in workers comp claims from reduced officer injuries was more than enough to cover the cost of training. There are a number of other benefits to this training, and I believe we have a certified training center right here in Baltimore. The program has been implemented by a number of departments nationwide and locally in Maryland (Aberdeen PD, Annapolis City PD, Greenbelt PD, Laurel PD). I would highly encourage you to research using this fantastic tool for JHPD, as it would provide officers with the training necessary to keep themselves and community members safe with the minimal possible force.</p>	<p>Original Language Retained: The JHPD is implementing Integrating Communications, Assessment, and Tactics (ICAT) training, which is an innovative, evidence-based approach to use-of-force training. ICAT provides first responding police officers with the tools, skills, and options they need to defuse a range of critical incidents successfully and safely.</p>
402 Use of Force	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?	Adopted: Addressed in Procedures I (B).

Policy Number and Title	Comment	Disposition
402 Use of Force	Pg 7: Reasonable: how do we define an 'objectively reasonable officer'?	Adopted: Addressed in Definitions.
402 Use of Force	Pg 9: Passive resistances: is going limp a sufficient metric in so far as going limp may not be intentional?	Adopted: Addressed in Definitions.
402 Use of Force	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.	Original Language Retained: The application of force is always intended to serve as a means of seizing or gaining control of a person to stop their assaultive behavior. In a lethal/deadly force situation, officers may not be reasonably capable of identifying themselves without increasing risk of harm to the officer or another person. Additionally, the JHPD is implementing Integrating Communications, Assessment, and Tactics (ICAT) training which is an innovative, evidence-based approach to use-of-force training. ICAT provides first responding police officers with the tools, skills, and options they need to defuse a range of critical incidents successfully and safely.
402 Use of Force	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.	Adopted: Addressed in Procedures IV (E).
402 Use of Force	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?	Original Language Retained: "A child under the age of 13 years may not be charged with a crime, only a delinquent act." (Md. Code Ann., Cts. & Jud. Proc. § 3-8A-03 (West)).
402 Use of Force	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?	Adopted: Addressed in Procedures VIII.
402 Use of Force	What about unintentionally breaking these rules? What is the punishment then? If I unintentionally kill someone what is still a crime!	Adopted: Addressed in Procedures VIII (B).
403 Authorized Defensive Weapons	Has a 17+1 ammunition capacity. Why are they not sticking with the standard 19?	Adopted: Addressed in Procedures II (A).
403 Authorized Defensive Weapons	There is no program listed anywhere, especially not in JHPD Policy #404.	Adopted: Addressed in Procedures II (C).
403 Authorized Defensive Weapons	This doesn't follow the format of the other policies. This would be the better way to address additional items in policy, but the majority of the policies drafted by JHPD has entire policies within policies that are already external policies.	Original Language Retained: Because the policy requirements related to these weapons are highly specialized, they have their own directives.

Policy Number and Title	Comment	Disposition
403 Authorized Defensive Weapons	<p>I am profoundly opposed to officers being authorized to carry their weapons while off-duty. As it is, a JHPD is seeking to introduce more guns into our community. Allowing officers to carry these deadly weapons at any time/in any context only heightens the danger for civilians and officers alike.</p>	<p>Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
403 Authorized Defensive Weapons	<p>No Firearms or projectile weapons of any kind should be permitted for use for any reason. Remove all firearms permissions for campus security or JHPD.</p>	<p>Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
403 Authorized Defensive Weapons	<p>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. I feel that the university would make a much better investment in community safety by funneling all funds dedicated to policing into the community instead. I consider all feedback I provide on policies to be a form of harm-reduction. 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.</p>	<p>Original Language Retained: Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
403 Authorized Defensive Weapons	<p>According to our military weapons expert, the Glock 26 would not be appropriate due to the actual size of the firearm. Usually, men find the 26 to be too small for their hands, and women find it to be too wide. In addition, the standard is the Glock 19 which has the smaller magazine.</p> <p>Why is JHPD not sticking with the standard? Under Directives, II. Authorized Firearms, D. Patrol Rifle Program, there is no "Patrol Rifle Program" outlined in detail in any policy drafted by JHPD.</p>	<p>Adopted: Addressed in Procedures II.</p>
403 Authorized Defensive Weapons	<p>NOT the name of the Council.</p>	<p>Adopted: Addressed in Procedures I.</p>
403 Authorized Defensive Weapons	<p>Military weapons expert, [REDACTED], said that the Glock 26 is considered the "compact" model which, unless needing to be concealed, isn't a weapon that is used much. It is usually too small for a mans hands and too wide for women.</p>	<p>Adopted: Addressed in Procedures II (A).</p>

Policy Number and Title	Comment	Disposition
403 Authorized Defensive Weapons	So, everyone gets a gun??	Adopted: Addressed in Procedures II (A).
403 Authorized Defensive Weapons	Since there is a policy specifically for Patrol Rifles, this is redundant and not necessary.	Adopted: Addressed in Procedures III (B).
403 Authorized Defensive Weapons	Should be in the "Definition".	Adopted: Addressed in Definitions.
403 Authorized Defensive Weapons	WHY IS THERE NO MENTION OF THE LAWS ALLOWING FOR THE HANDLING OF GUNS AS LAW ENFORCEMENT OFFICERS?!	Reflected: JHPD Directive #201, Authority, Department Organization & Command, details these laws and policies.
403 Authorized Defensive Weapons	LEOSA!!!	No Actionable Recommendation.
403 Authorized Defensive Weapons	The same statement for JHPD Policy #401 and # 402. Why?	Original Language Retained: Repeating these values in the policy statement serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
403 Authorized Defensive Weapons	Where did this policy come from?	Original Language Retained: JHPD conducted extensive benchmarking from around the country of different university and municipal police department policies and practices, selecting the best parts of each. While many requirements from other agencies are captured, all JHPD policies are tailored to the unique campus environment of Johns Hopkins.
403 Authorized Defensive Weapons	Belongs in "Training", not in Off-Duty Carry of DEPARTMENT Firearms.	Original Language Retained: This directive makes clear that police officers are only trained, qualified, and authorized to wear or carry JHPD-issued duty weapons while off- duty.
403 Authorized Defensive Weapons	This doesn't follow the other policy formats. The other policy formats go into detail of other parts of relevant policies, so should this one and not be a blanket statement. Unless they want to do the simpler thing and use this format in all other policies (recommended).	Original Language Retained: This format is used in other policies where appropriate.
403 Authorized Defensive Weapons	Put in training, not needed in policy since it changes from person to person.	Original Language Retained: Including detailed information about the effects, limitations, and risks of O.C. spray in the policy ensures that all officers have a consistent, legally sound, and operationally effective understanding of its use.
403 Authorized Defensive Weapons	Training, not policy, and is already covered in the statement that a verbal warning will be issued.	Original Language Retained: Including detailed information about the effects, limitations, and risks of O.C. spray in the policy ensures that all officers have a consistent, legally sound, and operationally effective understanding of its use.

Policy Number and Title	Comment	Disposition
403 Authorized Defensive Weapons	Training.	Original Language Retained: Including detailed information about the effects, limitations, and risks of O.C. spray in the policy ensures that all officers have a consistent, legally sound, and operationally effective understanding of its use.
403 Authorized Defensive Weapons	Redundant from other policies, but more times it's mentioned the better.	Original Language Retained: Repetition underscores the critical importance of this safety measure. Positional asphyxia is a serious risk, and continually highlighting this provision helps ensure that all officers are acutely aware of the dangers associated with prone or supine positioning.
404 Patrol Rifle	If the "Policy Statement" is generally going to say the same thing over and over again, don't include it. This is incredibly lazy.	Original Language Retained: Repeating these values in the policy statement serves to embed respect for human life, the necessity of de-escalation, and the requirement for reasonable, necessary, and proportional use of force into the fabric of JHPD's operational procedures.
404 Patrol Rifle	A patrol rifle is a defensive weapon. Why is it not under Policy #403?	Original Language Retained: Because the policy requirements related to these weapons are highly specialized, they have their own directives.
404 Patrol Rifle	This is legally setting JHPD up to be sued if the patrol rifle is used for any other reason other than an active shooter. This is also not a great justification for having a patrol rifle. According to the FBI, the average time for law enforcement to respond to an active shooter is 12.5 minutes at which point, the shooting is already over. With these statistics, a patrol rifle wouldn't be necessary.	Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.
404 Patrol Rifle	Should be in training; not appropriate to have in a policy document.	Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency
404 Patrol Rifle	<p>Why do you need 120 rounds of ammunition and 30 round magazines? The need for an M4 and enough ammo for a fun half day trip to Haditha strikes me as the militarization of our streets via the same tools used by soldiers.</p> <p>1) Those magazines are ILLEGAL for purchase in the State of Maryland. This violates your pledge to use military style weapons.</p>	Adopted: Addressed in Procedures I (B).
404 Patrol Rifle	<p>2) The standard combat patrol load-out is 210 rounds. Why do officers who are supposedly going to be trained on how to restrain their use of force, with so many other tools at their disposal, needs 120 rounds to patrol a college campus? You aren't fast roping into Somalia guys, calm down, how much kill do you need... Is this about playing soldier?</p>	Adopted: Addressed in Procedures I (B).

Policy Number and Title	Comment	Disposition
404 Patrol Rifle	3) Can you explain to me why officers who are trained in the best rifle handling skills, desclation, and use of force processes need a 30 round magazine with three more at the ready? That means you're got a lot of targets, poor marksmanship, or zero backup. I would hope you aren't planning to fight a war, that your officers could confirm a hit before firing a follow up, and could radio for a guy to bring more ammo. You guys have radios right?	Adopted: Addressed in Procedures I (B).
404 Patrol Rifle	4) You talk about the ability of this round/rifle to defeat body armor and barricades, we've also seen that officers tend to magazine dump at the first sense of panic. I've also seen how a some cops shoot, you guys need to work on that grouping under stress. As someone who often stands within rooms with walls, like many of you I assume, I worry about combining this knowledge with the above ammo count and fast access to reloads. Should I wear some NIJ IV to class just in case? Please advise	Adopted: Addressed in Procedures I (B).
404 Patrol Rifle	According to the FBI, 8% (4) of all active shootings in 2022 happened on an educational campus and 2% (1) in health care. Of the total number of active shooters, 0.18% were engaged by law enforcement. And 16% of the incidents had citizen intervention and/or confrontation which resulted in the end of the incident. The likelihood of an officer needing a high-powered, military grade weapon such as the identified patrol rifle is incredibly slim. Having a rifle in every vehicle is unrealistic and unreasonable especially if JHPD is going to work towards community policing and is something that Commissioner Worley is passionate about BPD working towards, as JHPD should be as well. The officers should not be sitting in their vehicles regularly to begin with.	Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.
404 Patrol Rifle	This is an extremely powerful weapon... More so than the AR-15.	Adopted: Addressed in Procedures I (A).
404 Patrol Rifle	Is this assuming that anytime the rifle is discharged it is considered Use of Force? This is an incomplete thought here.	Adopted: Addressed in Procedures V (B).
404 Patrol Rifle	There is an inconsistency in this Policy between creating a program and not creating a program. JHPD needs to decide if they are wanting to make this a program and redraft their policy to reflect that decision.	Adopted: Addressed throughout JHPD Directive #404: Patrol Rifle.
404 Patrol Rifle	Now there is a Rifle Program. In "A" there is a "Rifle Training Program"... which is it?	Adopted: Addressed in Procedures VII (B).
404 Patrol Rifle	This is not the name of their own policy...	Adopted: Addressed in Procedures VII (C).
404 Patrol Rifle	A THIRD title for this same policy... their policy...	Adopted: Addressed in Procedures VII (E).

Policy Number and Title	Comment	Disposition
404 Patrol Rifle	Again, mentioning a "Program". Where is this "Program"?	Adopted: Addressed in Procedures VII (E).
404 Patrol Rifle	Not the name of their own policy...	Adopted: Addressed in Procedures VII (E).
404 Patrol Rifle	Not the name of their own policy...	Adopted: Addressed in Procedures VII (F).
404 Patrol Rifle	Not a policy in first or second tranche	Adopted: Addressed in Related Resources.
404 Patrol Rifle	This isn't appropriate to have in a policy. Even if it is true and extremely sad.	Original Language Retained: Including the statement acknowledges the serious and real threat of active shooters on campuses and the necessity of a rapid and effective response of well-trained and equipped officers to minimize the loss of life.
404 Patrol Rifle	Only one?	Adopted: Addressed in Procedures VII (B).
404 Patrol Rifle	As a faculty member - and as a near-lifelong Baltimore City resident and JHU alum - 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	Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.
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.	Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.

Policy Number and Title	Comment	Disposition
404 Patrol Rifle	<p>As a post-doc fellow who have been working on the East Baltimore campus for 7 years, 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 JPHD, 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.</p>	Adopted: Addressed in Procedures I.
405 Conducted Energy Weapon	<p>Pg. 7, considerations before deploying, I would be explicit here: "Whether an individual's actions are the product of a behavioral health condition or crisis, including being under the influence of drugs/alcohol". Include neurodevelopmental conditions, such as autism explicitly. As autistics may misunderstand instructions or be incapable of responding when stressed (meltdown/shutdown).</p>	Adopted: Addressed in Procedures II (D).
405 Conducted Energy Weapon	<p>Alternative tactics shall be considered if the officer has information that the person: · Has a condition that would increase the danger to that person if exposed to a CEW probe deployment (e.g., a person at the scene tells the officer that the person has a heart condition). How would this fare if the person w the heart condition is a immediate threat to safety?</p>	Adopted: Addressed in Procedures III (E).
405 Conducted Energy Weapon	<p>Not much to really point out: again, the process for what is to be done during and prior to even using the CEWs is specific and detailed</p>	No Actionable Recommendation.
406 Special Impact Weapon	<p>Seeking clarification regarding the SIW projectile zones. In all of the diagrams on pages 6 -7, the groin is shown in red/zone 3/greatest potential for serious physical injury. However, in the text, the groin is categorized as yellow/zone 2. Am I misunderstanding? Should the groin be red/zone 3? Or yellow/zone 2?</p>	Adopted: Addressed in Procedures III (F).
407 Use of Force Reporting, Review & Assessment	<p>b) Consider mandatory mental health specialist appointments/check-in for level 2 or 3 UoF.</p>	Adopted: Addressed in Procedures III (D).

Policy Number and Title	Comment	Disposition
407 Use of Force Reporting, Review & Assessment	<p>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)</p> <ul style="list-style-type: none"> -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 	Adopted: Addressed in Procedures IX (H).
407 Use of Force Reporting, Review & Assessment	<p>a) 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.</p>	Adopted: Addressed in Policy Statement and Procedures IV (D).
407 Use of Force Reporting, Review & Assessment	<p>c) Offer peer and/or small group mental health counseling for all officers on a monthly basis</p>	Reflected: JHPD Directive #301, Personnel Management, details officer mental health counseling options.
407 Use of Force Reporting, Review & Assessment	<p>The three levels of Use of Force within this policy should be in the Use of Force Policy #402 as well, and both should be within the "Definitions" of the policy. It is not accurate to have the levels under a "General" identification.</p>	Adopted: Addressed in Definitions and JHPD Directive #402, Use of Force.
407 Use of Force Reporting, Review & Assessment	<p>The title on the Policy's Cover Memorandum is, "Use of Force Review, Assessment & Investigation", but the title on the Policy itself is "Use of Force Reporting, Review & Assessment." The title of the policy is what sets the content for and expectation of the policy—which title is it?</p>	Adopted: The cover memorandums that prefaced each draft policy, which provided background context for the public as they reviewed them, have since been removed to improve readability. Use of Force Reporting, Review & Assessment is the correct title.
407 Use of Force Reporting, Review & Assessment	<p>Core Principles should be included to be an accurate and thorough reporting and review of all Use of Force incidents involving a JHPD officer. Currently, there are no "Core Principles" in this policy.</p>	Adopted: Addressed in Core Principles.

Policy Number and Title	Comment	Disposition
407 Use of Force Reporting, Review & Assessment	<p>In section IV, section B, it states "The Use of Force Review shall be conducted by the PSAU, JHPD Supervisor at the PSAU's direction, a qualified third-party contracted by the PSAU to conduct the review, or another law enforcement agency.</p> <p>Which 'qualified third-party' companies are being looked at to partner with? Will there be a public RPF period? Is there any thought towards having a non law enforcement member be present as a third-party?</p> <p>Again, the idea that any accountability that the JHPD will be held to all seems to be internal, which is a huge cause of concern.</p>	<p>Original Language Retained: The Public Safety Accountability Unit (PSAU) is an independent investigative body within the Office of Hopkins Internal Audits. Its primary purpose is to ensure accountability and integrity by conducting thorough and impartial investigations and assessments of incidents involving the use of force and allegations of misconduct. Qualified third parties that PSAU may partner with to assist in use of force reviews include other law enforcement agencies, law firms, and consultants with appropriate expertise. Ultimately, discipline related to any use of force incident or misconduct matter involving a member of the public will be determined by the Administrative Charging Committee for Baltimore City or, if necessary, a Trial Board.</p>
407 Use of Force Reporting, Review & Assessment	<p>Under General, III. Use of Force, B., "...This does not include hospital visits resulting in minor treatment, without sutures, and release in the emergency department" needs to be updated to, "This does not include treatment and release in the emergency department, no matter how long the stay" (BPD Policy 1115). This should be reflected in Policy #402 when the levels of Use of Force are moved. Under Procedures, III. Supervisory Response to Use of Force Incidents, A.- D. needs to be moved to Policy #402 as these do not have anything to do with the review, reporting, assessment, and investigation of a use of force incident. Right now, there are no supervisory responsibilities within Policy #402. Under Procedures, III. Supervisory Response to Use of Force Incidents, F. Response by the Public Safety Accountability Unit (PSAU) is also not found in Policy #402 and states what the PSAU would do at the time of an incident. Under Procedures, IV. Use of Force Review, A. and B. have conflicting information. "A." states that the use of force review is done by PRB (not defined in "Definitions" but is only cited by acronym in this Policy), but in "B.", it is stated that the review is done by the PSAU.</p>	<p>Adopted: Addressed in JHPD Directive #402, Use of Force.</p>
408 Performance Review Board	<p>a) Core Principles, III: Accountability: CONSIDER CHANGING "...held accountable for ACTIONS that violate law or policy"</p>	<p>Adopted: Addressed in Core Principles III.</p>
408 Performance Review Board	<p>b) Procedures, General, A: CONSIDER ADDING "Any other incident that warrants Public Safety Accountability Unit (PSAU) investigation"</p>	<p>Adopted: Addressed in Procedures I (A).</p>
408 Performance Review Board	<p>c) V. Submission & Implementation of Recommendations, A: States "Within fourteen days of the PRB presentation" but under Procedures, I. General, F: "The PRB shall, within 30 days or review, provide a memorandum of recommendation..." Need to clarify if these are the same thing and what the correct timeframe should be.</p>	<p>Adopted: Addressed in Procedures I (F).</p>

Policy Number and Title	Comment	Disposition
408 Performance Review Board	d) V. Submission and Implementation, B, Equipment and teaching. Consider adding any recommendation of equipment should also include a disclosure statement or summary of evidence for the use.	Adopted: Addressed in Procedures V (B).
408 Performance Review Board	e) V. Submission and Implementation, B, Referral for Potential Misconduct: In "...they shall report the investigators to PSAU for failing to report the misconduct." Consider adding a report and status should be added to monitor the number of failures in reporting to PSAU. This way this becomes a trackable event and can be reported regularly as a measure of performance review and accountability	Adopted: Addressed in Procedures V (B).
408 Performance Review Board	f) V. Submission and Implementation, C, "THE Chief of police shall decide whether to adopt the PRB's recommendations." Consider the addition of a report as to the logic/reasoning when the CoP decides against implementation of recommendations. This again creates a paper trail and allows for tracking in the instance a similar situation arises in the future.	Adopted: Addressed in Procedures V (B).
408 Performance Review Board	Although members of the proposed police force will be employees of Johns Hopkins, given the power they will wield, boards created for the purpose of assessing their performance should be public rather than private. How is the board to be constituted?	Adopted: Addressed in Procedures II (A).
408 Performance Review Board	The Performance Review Board as described (p. 4) has no faculty, student, union, or community members. This makes it undemocratic and unrepresentative and weakens accountability.	Original Language Retained: The Performance Review Board is meant to perform a root cause analysis. To ensure candor, it is important that the proceedings have some level of confidentiality. In addition, a de-identified summary of all matters is provided to the Johns Hopkins Accountability Board. Ultimately, discipline related to any use of force incident or misconduct matter involving a member of the public will be determined by the Administrative Charging Committee for Baltimore City or, if necessary, a Trial Board.
409 Field Interviews, Investigative Stops & Pat-Downs	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.	Adopted: Addressed in Definitions and Procedures I & II.

Policy Number and Title	Comment	Disposition
409 Field Interviews, Investigative Stops & Pat-Downs	<p>2. Definition of "Community Interaction":</p> <p>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.</p> <p>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."</p>	Adopted: Addressed in Definitions and Procedures I & II.
409 Field Interviews, Investigative Stops & Pat-Downs	<p>Field Interview</p> <p>1. Redefinition of "Field Interview"</p> <p>Suggested Redefinition: Redefine "Field Interview" as a consensual interaction between law enforcement officers and community members with the specific purpose of asking questions or collecting information related to criminal activity or potential criminal activity.</p>	Adopted: Addressed in Definitions.
409 Field Interviews, Investigative Stops & Pat-Downs	<p>Searches:</p> <p>1. Suggested Revisions (Discovery of Illegal Narcotic or Paraphernalia):</p> <ul style="list-style-type: none"> -All searches conducted by law enforcement officers, where no immediate physical danger to themselves or others is perceived, requires the presence of probable cause. -Where a search is initiated based on a standard lower than probable cause, law enforcement officers must possess Reasonable Articulate Suspicion that an individual poses an immediate physical danger to the officer or others. -In the event that, during the search, no illegal weapon constituting an immediate physical danger is found but illegal narcotics or narcotic paraphernalia are discovered, officers are required to confiscate the contraband. However, an arrest shall not be made solely based on the discovery of such contraband. -If, during the search, an illegal weapon posing an immediate physical danger to the officer or others is discovered along with other contraband, the officer is permitted to make an arrest for all discovered items. <p>2. Rationale for Proposed Changes:</p>	Adopted: Addressed in Procedures V (A)(F)(G).

Policy Number and Title	Comment	Disposition
	<p>The proposed revisions seek to establish a clear and coherent framework for law enforcement searches, emphasizing the crucial role of probable cause in non-immediate physical danger scenarios. In situations where contraband other than illegal weapons is discovered, the proposed revision seeks to guide officers to confiscate the items (narcotic or narcotic paraphernalia) while maintaining a balance by emphasizing that an arrest should not be based solely on the discovery of such contraband. This ensures a measured response in-line with the severity of the situation. When an illegal weapon posing an immediate danger is found alongside other contraband, the proposed revision allows officers the discretion to make an arrest for all discovered items, contributing to a comprehensive and uniform approach in handling such situations. Also, such policy revision may incentivize community members to not keep illegal weapons on their person.</p> <p>Thank you for considering these proposed revisions. I believe these adjustments will contribute to a more precise, accountable, and effective framework for law enforcement interactions.</p>	
409 Field Interviews, Investigative Stops & Pat-Downs	<p>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.</p>	No Actionable Recommendation.
409 Field Interviews, Investigative Stops & Pat-Downs	<p>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.</p> <p>3. Rationale for Proposed Changes: The proposed changes aim to create a clearer distinction between the two voluntary/consensual civilian law enforcement contacts, reducing the potential for misclassification. The current policy lacks clear boundaries between "Voluntary Contact" and "Filed Interviews," leaving room for misclassification. Notably, the disparity in documentation requirements (throughout the entire policy) may incentivize officers to downgrade contacts to avoid administrative burdens. The revision to "Community Interaction" ensures officers can easily differentiate between the two concepts, maintaining accuracy in the classification of civilian-law enforcement contacts department-wide.</p>	No Actionable Recommendation.

Policy Number and Title	Comment	Disposition
409 Field Interviews, Investigative Stops & Pat-Downs	<p>2. Additional Suggested Aspects for "Field Interviews"</p> <ul style="list-style-type: none"> -Field Interviews should be initiated by law enforcement officers only when and where a reasonable officer would believe further investigation is warranted. -Strict prohibition on . -During Field Interviews, officers are not permitted to request consent to search community members. -Officers are not permitted to request or accept identification, such as a driver's license, from community members during Field Interviews. -Activation of Body-Worn Camera is mandatory at the initiation of the Field Interview, and deactivation is allowed only upon completion of the encounter. -Completion of Citizen/Police Contact Receipts is required for all Field Interviews, with copies provided to community members. -Mandatory submission of an Incident Report within 24 hours of concluding the Field Interview. <p>The proposed changes aim to create clearer distinctions between Field Interviews, Community Interactions, and Involuntary Stops, such as Investigative Stops, minimizing the potential for misclassification. The inclusion of prohibitions, such as using Field Interviews as a pretext for an Investigative Stop, and restrictions on requesting consent to search and soliciting identification, contribute to transparency and prevent misuse of the interaction. Also, I noticed there is a prohibition in the policy against using Voluntary Contact as a pretext for Investigative Stops, and I proposed including this prohibition for the other voluntary interaction, Field Interview. Mandatory Body-Worn Camera activation and informing community members at the outset align with the voluntary nature of the interaction, empowering community members with the ability to make an informed decision on whether to engage with the officer. Documentation requirements for Field Interviews have been enhanced to align more closely with other types of contacts that include investigative components. This was done to bring consistency to documentation practices across different types of contacts, reduce the potential for misclassification, and ensure accountability. Finally, the inclusion of a 24-hour Incident Report submission deadline ensures additional clarity for officers. This is because the policy specifies a 72-hour submission deadline for supervisors to review but does not explicitly provide a submission deadline for officers.</p>	Adopted: Addressed in Procedures III.
410 Foot Pursuits	In Section III or IV – not pursuing beyond the jurisdictional limits of the JHPD (though this might be implied)	Adopted: Addressed in Procedures III (A).
410 Foot Pursuits	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	Adopted: Addressed in Procedures III (A)

Policy Number and Title	Comment	Disposition
410 Foot Pursuits	a) VII. Reporting, A. Consider adding a section regarding inventory of confiscated items (especially ones of material value) that may or may not be related to the incident. What is the process of retrieving said objects if unrelated to incident?	Adopted: Addressed in Procedures VII (A).
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.	Adopted: Addressed in Procedures III (A).
410 Foot Pursuits	<p>What is the punishment for officers who break these rules?</p> <p>Pg. 6: I.B.: NOTE: Under what circumstances would a person transition from not being under arrest to being under arrest in this situation? Could an officer put a person under arrest for ‘not following specific orders’ as an excuse to then bypass this NOTE?</p>	Reflected: JHPD Directive #350, Complaints Against Police Personnel, details investigation and disciplinary procedures.
410 Foot Pursuits	Pg. 6: V. A: What is the consequence /punishment of the camera not being on to the officer?	Reflected: JHPD Directive #350, Complaints Against Police Personnel, details investigation and disciplinary procedures.
411 Search & Seizure	<p>This directive (411) is not referenced under directive 433 on body-worn cameras (and vice versa), although other directives are. In fact, there are discrepancies regarding strip searches and body-worn cameras in directives 433 and 411. For example, directive 411 says “The wishes of the person being searched will be followed by the primary officer and all assisting or witnessing officers.” But, directive 433 says “if the person does not respond, the officer shall maintain [body-worn camera] activation during the search”. Which one prevails? If the person does not respond, no search should be performed at all.</p> <p>The option to turn off the body-worn camera seems to be presented as a favor to the person being strip searched in directive 433, whereas this directive (411) seems to respect the wishes of the person being strip searched at all times. In reality, the options provided in directive 433 are lose-lose choices for the person being strip searched. For example, what will happen in the event that the person does not desire to be on camera while strip searched, and sexual assault to the person being strip searched (or worse) takes place while the body-worn camera is off? If the person is not responsive enough to agree to a strip search, why is that person considered such a threat that a strip search will proceed anyway, against the person’s verbal wishes? The absence of consent is not consent.</p>	Adopted: Addressed in JHPD Directive #433, Body-Worn Cameras, Procedures III (I).

Policy Number and Title	Comment	Disposition
	<p>Do the reasons for strip searching provided under this directive apply to directive 433? Is the need to conduct a strip search similarly expected to be an “extremely rare” occurrence under directive 433? How often is considered “extremely rare”? Does the requirement to have others present during a strip search apply under directive 433? Will there be assisting and witnessing officers under directive 433? Or, is directive 433 truly intended to provide independent and broader latitude in comparison to the details listed here in directive 411?</p> <p>Note that the example discrepancies provided above are not intended to be an exhaustive list.</p> <p>Overall, these discrepancies and the absence of clarity regarding these and other related details are not consistent with the values and needs of the community.</p>	
411 Search & Seizure	<p>A general note that this policy requires more proofreading and editing for spelling/grammar, as there are many throughout. No other comments</p>	<p>Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.</p>
412 Custody, Transport & Processing	<p>a) J. Officers responsible for transportation... Consider adding explicit conditions/timeframe for which period safety checks are performed.</p>	<p>Adopted: Addressed in Procedures IV (J).</p>
412 Custody, Transport & Processing	<p>b) L. Person in Custody Communications. Consider adding caveat if regarding those with medical conditions or psychological crises where communication may allow for safe transfer.</p>	<p>Adopted: Addressed in Procedures IV (L).</p>
412 Custody, Transport & Processing	<p>c) X. In Custody Death Procedures A. Consider including more detail regarding rendering aid, contact of medic/EMS. Detail about pronouncement of death.</p>	<p>Adopted: Addressed in Procedures IX (A).</p>
413 Diplomatic Immunity	<p>A) As someone who has in the past worked overseas with diplomatic functional immunity, I understand that this is a complex area and would be clearer if “functional immunity” were elaborated. -Consider adding language on “functional immunity” to Procedure E. Such as: “... find that criminal acts occurred in the course of official duties. (ie: functional immunity) Persons with limited criminal immunity enjoy limited or no personal inviolability for private acts performed outside their official duties.” -Consider adding “Functional Immunity” to the definitions.</p>	<p>Adopted: Addressed in Definitions and Procedures I (E).</p>

Policy Number and Title	Comment	Disposition
414 Noncitizen Interactions	<p>414, pg. 1</p> <p>Policy Statement</p> <p>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.</p> <p>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)</p>	Adopted: Addressed in Policy Statement.
414 Noncitizen Interactions	<p>414, pg. 3</p> <p>B. Members shall not initiate an investigation or take law enforcement action on the basis of actual or perceived immigration status, citizenship, national origin, and/or ability to speak or understand the English language.</p> <p>·If a person is unable to speak or understand the English Language, members of the JHPD shall utilize Language and Interpretation Services in accordance with JHPD Directive #434, Language Access Services, where applicable.</p> <p>COMMENTS: This needs to be emphasized and included in other policies (cross-referenced). 414, pg. 5</p> <p>D. Members shall not confiscate Permanent Resident Cards or Documents (also known as “green cards”), Employment Authorization Cards, or any other residency, citizenship, or immigration permits or documents unless the officer has reason to believe that the documents are counterfeit with fraudulent intent and thereby indicative of a violation of applicable statutes involving the possession of fraudulent government identification documents (MD Code, Criminal, 8-303).</p> <p>COMMENTS: If this happens, what is the procedure someone follows to file a complaint and/or get docs back?</p>	Reflected: JHPD Directive #350, Complaints Against Police Personnel, details investigation and disciplinary procedures.

Policy Number and Title	Comment	Disposition
414 Noncitizen Interactions	<p>414, pg. 11</p> <p>VII. Training</p> <p>A. The Public Safety Training Section shall ensure that all members, upon hire, receive training on this policy, the process for making consular notifications, and the process of providing access to foreign officials.</p> <p>COMMENTS:</p> <ul style="list-style-type: none"> ·Centro SOL and others should be consulted to support training. ·The more frequent issue I suspect will be hesitation on the part of immigrant community members from interacting with police even when victims of crime. 	<p>Adopted: Addressed in Policy Statement.</p>
414 Noncitizen Interactions	<p>414, pg. 9</p> <p>B. When a non-citizen has been arrested or detained, members shall:</p> <p>Attempt to determine the person's country of citizenship. In the absence of the information, assume this is the country displayed on the passport or other identification presented. This information will be placed on the arrest sheet.</p> <p>COMMENTS: This where I wonder if it's different if I'm a professor of microbiology visiting for a month from El Salvador versus an undocumented immigrant from Honduras who's been here 15 years working at a restaurant.</p>	<p>Adopted: Addressed in Policy Statement.</p>
414 Noncitizen Interactions	<p>Interestingly, there is the clause that JHPD shall utilize Language and Interpretation Services in accordance with JHPD Directive #434, Language Access Services, where applicable. Not sure where that is but theres that</p>	<p>Reflected: JHPD Directive #434, Language Access Services, explains when officers would utilize interpretation services.</p>
414 Noncitizen Interactions	<p>Cannot report to ICE or basically work with ICE at all</p>	<p>Reflected: Directive #414, Noncitizen Interactions, explains that "members are not permitted to accept requests by U.S. Immigration and Customs Enforcement or other agencies to support or assist in civil immigration enforcement opportunities."</p>
414 Noncitizen Interactions	<p>A lot of the responsibility surrounding non-citizens, including arrests, has to be given to a consular officer</p>	<p>No Actionable Recommendation.</p>

Policy Number and Title	Comment	Disposition
415 Individuals with Behavioral Health Conditions	<p>Pg.10, part C on things to do</p> <p>“look for personal identification”, should also mention medical ID bracelets (I wear one by the brand MyID) or that medical profiles may be found on cell phones (these can be viewed without unlocking the phone).</p> <p>“call the caregiver” assumes that the person has a caregiver. I would phrase this as “contact their emergency contacts or caregiver”. The profile brought up by my bracelet has emergency contacts which are close friends of mine.</p> <p>Not mentioned in that list, but should be- assume competence and talk to as if they can understand, unless given reason to believe otherwise. Intellectual disability is one type of developmental disability, and there are many folks with developmental disabilities, including autistics and those with down syndrome, who do not have intellectual disabilities.</p>	Adopted: Addressed in Procedures V (C).
415 Individuals with Behavioral Health Conditions	<p>Not included but would like to see:</p> <p>information about training on neurodivergent conditions and being neurodivergent-affirming in interactions. Of particular importance, not questioning self-diagnosis and believing individuals when they state they have a neurodivergent condition.</p> <p>Information/training to officers on folks with developmental disabilities or mental health conditions being statistically more likely to being victims of crime and abuse</p>	Adopted: Addressed in Definitions and Procedures V (C).
415 Individuals with Behavioral Health Conditions	<p>a) Definitions. Should there be discussion regarding the use of behavioral health Crisis Support Team (BHCST) for non-JHU-affiliated persons, such as general members of the community?</p>	Adopted: Addressed in Definitions.
415 Individuals with Behavioral Health Conditions	<p>415, pg. 13</p> <p>B. Several providers in the larger community are also available to assist officers and telecommunicators. These include, but are not limited to:</p> <ul style="list-style-type: none"> • 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 	Adopted: Addressed in Procedures VIII (B).

Policy Number and Title	Comment	Disposition
415 Individuals with Behavioral Health Conditions	<p>00/00/2023 Johns Hopkins Police Department 415, pg. 14</p> <ul style="list-style-type: none"> • Maryland Mental Health Association • Maryland Psychological Association • Maryland Youth Crisis Hotline • Mental Health Association of Maryland • National Suicide Prevention Hotline: 988 <p>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.</p>	Adopted: Addressed in Procedures VIII (B).
415 Individuals with Behavioral Health Conditions	<p>Thank you for the opportunity to submit comments</p> <p>The policies should set out training and use of extreme risk protection orders in Maryland. These are associated with fewer suicides and can also prevent homicides and mass shootings. see http://americanhealth.jhu.edu/implementERPO</p>	Adopted: Addressed in Procedures V (H) and in JHPD Directive #416, Behavioral Health Crisis Dispatch.
416 Behavioral Health Crisis Dispatch	<p>416, pg. 4</p> <p>I. Behavioral Health Response Program</p> <p>A. JHU's Behavioral Health Crisis Support Team (BHCST) is a co-responder model that pairs behavioral health clinicians with specially trained, unarmed public safety personnel to provide immediate in-person assistance to individuals experience a personal crisis.</p> <p>COMMENTS: language capabilities?</p>	Adopted: Addressed in Procedures I (E).
416 Behavioral Health Crisis Dispatch	<p>I am relieved to see that officers will be trained recognize behavior health 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.</p>	No Actionable Recommendation.
418 Behavioral Threat Assessment	<p>p. 4, section E,</p> <p>Clarify that psychological distress or feelings of injustice that are reasonable beliefs by a citizen based on potential risk of police violence directed toward the citizen do not constitute indicators of risk of violence.</p> <p>Justification: An individual protesting police brutality could be identified by an officer as experiencing "psychological distress" or "feelings of injustice" and then be incorrectly assessed as a threat under this operational procedure.</p>	Adopted: Addressed in Procedures II (F).
418 Behavioral Threat Assessment	<p>Is it appropriate to add procedure for dealing with individual who is assessed not to be a immediate threat?. it is likely this will be a large number of cases, and the policy seems lacking on this point, therefore.</p>	Adopted: Addressed in Procedures III (B).

Policy Number and Title	Comment	Disposition
418 Behavioral Threat Assessment	<p>Page 4, section E:</p> <p>The following "indicators of violence" seem open to abuse of interpretation: "psychological distress" and "feelings of injustice" may be reasonable reactions from a person facing a police officer and do not warrant the label of "indicators of violence".</p> <p>While the person may have good reasons to fear an encounter with a police officer and may feel threatened by potential violence from the armed officer, this policy completely turns this reasonable reaction into what it is not by itself: it should not be included as a "indicator of risk of violence" from the person facing the police officer.</p> <p>Thank you.</p>	Adopted: Addressed in Procedures II (F).
418 Behavioral Threat Assessment	<p>Crisis or behavioral health issue: Directives #415, Individuals with Behavioral Health Conditions and #417, Emergency Medical Examination & Assistance.</p> <p>**In what ways will they work with and be trained by the behavioral health crisis support team at JHU?*</p>	Adopted: Addressed in Procedures IV.
418 Behavioral Threat Assessment	<p>In this policy, in section II.D there is a mention of requiring investigation of harassment. Will all members of the community (particularly those from marginalized groups) be able to feel confident that their complaints of harassment will be taken seriously? How will reports of and responses to harassment be accounted for so that everyone can feel confident that their concerns will be taken seriously and they will be kept safe? This is primarily a request for accountability.</p>	Adopted: Addressed in Procedures II (E).
420 Domestic Violence, Stalking & Harassment	<p>1) Missing appendices C and D, recommend adding Appendices A (resource brochure) and B (additional info on trauma informed, victim centered responses) from Directive 465 here.</p>	Reflected: Appendices added.
420 Domestic Violence, Stalking & Harassment	<p>2) Consider linking to OIE online policies directly rather than listing definitions from those policies, as the definitions and other content are often updated.</p>	Adopted: Addressed in Purpose and Related Resources. Former Appendix G removed.
420 Domestic Violence, Stalking & Harassment	<p>4) Link policies and law for technological abuse (e.g. revenge porn - threat of sharing or actual sharing of intimate photos or videos of an intimate partner as a method of coercion or manipulation) in the directive, noting that cases of revenge porn or other online sexual harassment should be handled in a victimcentered, trauma-informed manner. Because these scenarios can be common in abusive relationships, consider adding a scenario including technological sexual harassment or revenge porn to trainings. Recommend connecting victims to resources on JHU Resources brochure.</p>	Adopted: Addressed in Procedures III (P) and JHPD Directive #465, Response to Crimes of Sexual Violence.

Policy Number and Title	Comment	Disposition
420 Domestic Violence, Stalking & Harassment	6) Recommendation to perform full Danger Assessment for person at high risk on LAP similar to that performed by House of Ruth MD staff. MNADV is putting out a Lethality Assessment Program Lethality Screen 2.0 with increased emphasis on risk of strangulation, so may want to update when the new version comes out (any day now). The MNADV website (https://www.mnadv.org/) and the Danger Assessment website (www.dangerassessment.org) should be provided.	Adopted: Addressed in Procedures IX.
420 Domestic Violence, Stalking & Harassment	Pg.10-11, determining primary aggressor. There is no mention of DARVO here, but there should be. It is also worth mentioning gaslighting and that the victim may question their own memory or version of events if gaslighting is present.	Adopted: Addressed in Procedures IV (J).
420 Domestic Violence, Stalking & Harassment	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)	Adopted: Addressed in Procedures XIV (B)(C).
420 Domestic Violence, Stalking & Harassment	Thorough in including the LAP and taking a trauma-informed lens. the policy is advised to include: 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	Adopted: Addressed in Core Principles II (E).
420 Domestic Violence, Stalking & Harassment	Thorough in including the LAP and taking a trauma-informed lens. the policy is advised to include: 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).	Adopted: Addressed in Procedures XIV (C).
420 Domestic Violence, Stalking & Harassment	Thorough in including the LAP and taking a trauma-informed lens. the policy is advised to include: 4) make use of existing evidence-based strategies for onward support and referral, including www.myplan.org	Adopted: Addressed in appendices A and B.
420 Domestic Violence, Stalking & Harassment	Thorough in including the LAP and taking a trauma-informed lens. the policy is advised to include: 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	Original Language Retained: This information can serve as a reference source for JHPD training materials.

Policy Number and Title	Comment	Disposition
420 Domestic Violence, Stalking & Harassment	<p>Thorough in including the LAP and taking a trauma-informed lens. the policy is advised to include: 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.</p>	Adopted: Addressed in Procedures XIV (C).
420 Domestic Violence, Stalking & Harassment	<p>The following feedback is submitted on behalf of the Provost’s Sexual Violence Advisory Committee (SVAC). The comments were collected by the SVAC and compiled by the SVAC’s Policy and Communication Subcommittee. [REDACTED]</p> <p>1) Training should occur at least annually and in person.</p>	Adopted: Addressed in Procedures XIV (B).
420 Domestic Violence, Stalking & Harassment	<p>The following feedback is submitted on behalf of the Provost’s Sexual Violence Advisory Committee (SVAC). The comments were collected by the SVAC and compiled by the SVAC’s Policy and Communication Subcommittee.</p> <p>2) Training contents should be prepared, reviewed, and facilitated by gender-based violence experts prior to use.</p>	Adopted: Addressed in Procedures XIV (C).
420 Domestic Violence, Stalking & Harassment	<p>The following feedback is submitted on behalf of the Provost’s Sexual Violence Advisory Committee (SVAC). The comments were collected by the SVAC and compiled by the SVAC’s Policy and Communication Subcommittee. 3) The material used for trainings should be made available to the public.</p>	Adopted: Addressed in Procedures XIV (C).
420 Domestic Violence, Stalking & Harassment	<p>The following feedback is submitted on behalf of the Provost’s Sexual Violence Advisory Committee (SVAC). The comments were collected by the SVAC and compiled by the SVAC’s Policy and Communication Subcommittee.</p> <p>4) Recommended additions to the training list of topics:</p> <ul style="list-style-type: none"> -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 	Adopted: Addressed in Procedures XIV (C).

Policy Number and Title	Comment	Disposition
420 Domestic Violence, Stalking & Harassment	Comments on accountability: 1) Clarify processes for when any part of the directive is not followed, including specific references to other Directives regarding complaints, accountability and discipline (who evaluates process, what is the bar for immediate dismissal, what is the plan for other responses to behavior is in conflict with directives?).	Adopted: Addressed in Policy Enforcement.
420 Domestic Violence, Stalking & Harassment	Comments on accountability: 2) Indicate that information about the Public Safety Accountability Unit (PSAU) will be provided to victims proactively, at the forefront of interactions, with an explanation of victims' right and encouragement to submit a complaint.	Adopted: Addressed in Procedures IX (H) and Appendix A.
420 Domestic Violence, Stalking & Harassment	3) Include method for survivors to contact JHPD member in charge of their case, and timeline/ accountability protocols for prompt officer responses.	Adopted: Addressed in Procedures IX (F).
420 Domestic Violence, Stalking & Harassment	5) Indicate that locations of victims will be kept confidential and specifically will not be shared with offender or other parties	Adopted: Addressed in Core Principles II (F).
421 Court Orders of Protection	Procedures 1. General. A: Recommend link to NIBRS Group A and B offenses. It appears based on these categories, the majority if not all cases would fall under the jurisdiction of the BPD, not JHPD. How do you ensure that JHPD helps facilitate the process and ensure the safety of the victim.	Original Language Retained: Pursuant to the Memorandum of Understanding (section B.1.c), the JHPD will have the primary responsibility of patrolling the buildings and property of the Campus Area. The JHPD will handle all incidents in accordance with the Community Safety and Strengthening Act and the Memorandum of Understanding and serve as the first responder to all routine calls for service, all non-emergency calls for service, and all emergency calls for service within the Campus Area that call for a police response.
421 Court Orders of Protection	Definitions: cohabitant – why does this definition not include roommates who do not have a sexual relationship?	Original Language Retained: Definition of Cohabitant is from MD Code, Family Law, § 4-501.
421 Court Orders of Protection	II. B/C: In the scenario a crime is committed that would fall into the eligibility criteria for a protective or peace order, how are the number of orders requested, declined, approved, and events with or without an order captured?	Adopted: Addressed in Procedures VI (A).
421 Court Orders of Protection	III. B. How do you ensure the safety of a victim if an order has been approved but never served to the respondent?	Adopted: Addressed in Procedures VII.
421 Court Orders of Protection	How will students learn about their choices for protective and peace orders. understanding rights and choices in stalking, blackmail, and harassment incidents would be important	Adopted: Addressed in Procedures I (A)(C).

Policy Number and Title	Comment	Disposition
422 Victim & Witness Assistance	Policy Core Principles: I. Trauma Informed Response and II. Victim-Centered Support: Would recommend stating what type of training is required and how frequently it is updated.	Adopted: Addressed in Procedures XI.
422 Victim & Witness Assistance	VIII. Resources: Link to safeathopkins.org does not work.	Adopted: Addressed in Procedures VIII (A).
422 Victim & Witness Assistance	XI. Training: Recommend adding frequency of training.	Adopted: Addressed in Procedures XI.
422 Victim & Witness Assistance	<p>JHPD Directive #434, Language Access Services). Cultural background can affect the crime victim's response and reaction to being victimized and how they are treated by family and community members.</p> <p>JHPD members should be aware of these special circumstances and work with the appropriate service providers and community partners to support victims in these situations **Besides awareness, what kind of cultural training will be provided? Students come from all over the world, there may not be a clear community partner to support a Bangladeshi grad student in crisis for example.**</p>	Adopted: Addressed in Procedures XI. JHPD employees must complete training on providing assistance and services to victims and witnesses of crime as well as cultural sensitivity training including how persons from different cultures may react to being victimized themselves and their relatives' and friends' reports of being victims.
422 Victim & Witness Assistance	A supply of the Maryland Crime Victims and Witnesses: Your Rights and Services booklet will be maintained by the CVSC.- **What languages?*	Adopted: Addressed in Procedures VII (B).
422 Victim & Witness Assistance	Witness Relocation Unit the primary investigator on the related criminal case to ensure that the victim's/ witness's safety is secured as quickly and securely as possible. **Not sure if this is temporary? For students who are victims of crimes or have protection orders, how will their online/student profile and information be protected? Like in a student directory, course list..etc'*	Adopted: Addressed in Procedures VIII (A).
422 Victim & Witness Assistance	Section VII, special considerations, lists physical, mental, or emotional impairments, child and elderly, and then a note about language issues in section B. What about other marginalized populations? Perhaps these are included in the general statement of section B, but would it be worth mentioning women, LGBTQ+, etc.?	Adopted: Addressed in Procedures VII (C).
423 Arrest Warrants, Attachments & Criminal Process	Pg. 10. V.A. "The person has previously failed to respond to a summons that has been personally served or a citation". By what method will summons be delivered and what is the time delay in ascertaining 'failed to respond'. A summons getting lost in the mail or one that someone took more than a couple days to respond to should not be an impetus for arrest.	Adopted: Addressed in Procedures V (A).

Policy Number and Title	Comment	Disposition
423 Arrest Warrants, Attachments & Criminal Process	Pg. 14. VII.O. "If there are no injuries or complaints of injuries, the officer shall promptly transport the person to Central Booking and Intake Facility (CBIF)" while there may not be visible injuries, the person may not be in a situation where they could properly communicate they are injured (concussion, shock, etc). Officers should assess for hidden injuries as well (like a concussion test) and also ask the person if they are injured, not just wait for the person to speak up or what they can see.	Adopted: Addressed in JHPD Directive #412, Custody, Transport & Processing.
424 Arrests & Alternatives to Arrest	Thank you for the opportunity to submit comments. The policy should consider explaining when school leadership will be notified of significant police action against their faculty, staff, or students.	Adopted: Addressed in Procedures VI.
425 Community Policing & Problem Solving	In paragraph I.C in the discussion about "...people of diverse faiths, races...", the list is extensive (I count 9) but there are 16 categories in the JHU diversity wheel. The list does not include age, political beliefs, or several other items in the diversity wheel. Is there a reason for favoring some of the items from the diversity wheel over others on this list?	Adopted: Addressed in Procedures I (B).
425 Community Policing & Problem Solving	<p>In reviewing the JHPD Draft Policies, I found it difficult to find a clearly stated jurisdiction or "beat" for JHPD.</p> <p>In Section 425 however, I do see a definition of Homewood Campus. I notice that it excludes JHU's leased property west of Stony Run. This lease area is bounded north by University Parkway, west by Tudor Arms Avenue, and South by 37th Street. Use of this area for recreational purposes by JHU students was negotiated and agreed upon between Baltimore City and JHU. These parties share a duty of care over this parcel. The under-resourced BCPD does not take any initiative over this area. I do not think it's reasonable expect BCPD to do so.</p> <p>The leased area is contiguous with the Homewood Campus. It's a beautiful natural oasis in the city readily available to JHU students. Unfortunately however, I've heard many reports from students of not feeling safe there.</p> <p>Please be sure to include this lease area in the JHPD beat. Allow students to feel safe here and invite them back into Wyman Park.</p> <p>Disclosure: [REDACTED] *I am not speaking directly for either of these groups with this input.</p>	<p>Original Language Retained: Johns Hopkins is implementing the JHPD only within the university's Homewood, East Baltimore, and Peabody "campus area" as defined in both the Community Safety and Strengthening Act and the Memorandum of Understanding.</p> <p>"Campus area" is defined in state law as property that is: owned, leased, operated by, or under the control of the University; located within specific boundaries (listed in the Act) on the Homewood, East Baltimore, and Peabody campuses; and used for educational or institutional purposes.</p> <p>The JHPD campus area does not include non-Hopkins property, except public sidewalks, public streets, or other public thoroughfares, and/or parking facilities that are immediately adjacent to the campus. Preliminary maps of the JHPD jurisdictional boundaries can be viewed on the Public Safety website.</p>
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.	No Actionable Recommendation.
426 Interactions with Youth	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.	No Actionable Recommendation.

Policy Number and Title	Comment	Disposition
426 Interactions with Youth	Lots of protocols for the interrogations	No Actionable Recommendation.
426 Interactions with Youth	In this policy description, it says that strip searches are only to be used under appropriate circumstances but the definition of strip searches in the document does not classify a pat down as a strip search unless underclothes are "Removed or Rearranged". This means at any time an officer could ask a youth to take off a jacket and pat the youth down under any circumstances. I think this definition should be reworked so that it is clear that these types of searches require probable cause because without that protection it seems like an unethical loophole.	Reflected: Procedures V and JHPD Directive #409, Field Interviews, Investigative Stops & Pat-Downs, detail pat-down policies and definitions. According to the terms of that policy, a pat-down is justified only when an officer has reasonable suspicion to believe that the person may be armed and dangerous. The removal of a jacket can be part of this process if the officer reasonably believes that weapons or contraband may be concealed underneath. The removal of a jacket is not considered a strip search because its removal typically leaves the individual fully clothed in other garments, such as shirts, pants, or skirts, which cover private areas.
426 Interactions with Youth	The information for the YOUTH Access to Counsel Hotline in Policy 426 are not current/the phone number is outdated. Find 1-800 and proper information here https://www.opd.state.md.us/_files/ugd/868471_56fbb69b343745d1b947749a46d9aa2e.pdf	Adopted: Addressed in Procedures XII (H).
432 Automated External Defibrillator	Procedures. 1. C.: Would suggest all officers be trained in AED use as time is of the essence in cardiac arrest.	Adopted: Addressed in Procedures I (B).
433 Body-Worn Cameras	Thank you for the opportunity to submit comments. JHPD should consider a more routine review of body worn camera footage with some regularity for each officer.	Adopted: Addressed in Procedures VI (H).
434 Language Access Services	C. Language skilled bilingual members: Would recommend that LSBM undergo testing to demonstrate proficiency in a language prior to using that language for communication with the public as there is some associated risk with miscommunication and the decision to use language services is arbitrary and left open to the officer to decide rather than formally defined based on specific contexts.	Original Language Retained: While it is important to recognize the limitations of an officer's language proficiency, the benefits of attempting communication in the individual's non-English language often outweigh the risks, provided it is done thoughtfully and supplemented with supports outlined in directives as needed.
434 Language Access Services	B. Onsite Interpreters: The need for written request beyond supervisor approval seems like an unnecessary hurdle that likely will prevent the use of in-person services when they would more than likely be indicated. Would suggest that this process not be so cumbersome as it is within the rights of LEP persons to have access to language interpretation, free of cost.	Adopted: Addressed in Procedures III (B).
434 Language Access Services	The Directive explains that in circumstances requiring lengthier and more complex communications, such as formal witness and victim interviews and suspect interrogations, it is strongly preferred to use onsite (in-person) interpreters. Members seeking to use onsite interpreters shall consult their supervisor for approval and submit a written request". **How long would approval take in these situations? Sounds like they are urgent and important scenarios**	Adopted: Addressed in Procedures III (B).

Policy Number and Title	Comment	Disposition
434 Language Access Services	If there is an individual with limited English proficiency who is also a member of an otherwise marginalized population, are there any steps necessary to ensure that the interpreter is proficient in the issues related to the marginalized population of interest? Is there any special procedure to ensure that this will be the case for individuals in need if the initial interpreter is not able to keep up?	Adopted: Addressed in Procedures III (E).
435 Communicating with Persons Who Are Hearing Impaired	I would like to raise a similar issue for this as for language access. Is there an allowance for particular issues for those who are hearing impaired and members of an additional marginalized population?	Adopted: Addressed in Procedures III (E).
435 Communicating with Persons Who Are Hearing Impaired	Please also include communicating with persons who use a second language, persons who may be under the influence of mind-altering drugs and persons with mental or communication disorders (psychosis or autism, for example).	Reflected: JHPD Directives #434, Language Access Services, and #415, Individuals with Behavioral Health Conditions, detail policies for various communication scenarios.
441 Vehicle Pursuits	<p>I will begin this, and all other feedback I give with the following: I have not read each and every policy that you have posted. I simply don't have the time to do that alongside keeping up with my work. I have simply selected a handful of them, found them all to be egregious, and am criticizing them as they stand. I am sure that if I read the rest, I would find them similarly lacking. I will primarily be using your prompt "Is this policy consistent with the values and needs of the community?"</p> <p>Let us begin with the notion of Vehicle Pursuits. Take the following news article into consideration as you read the rest of this. https://www.cbsnews.com/baltimore/news/body-worn-camera-footage-shows-a-baltimore-police-pursuit-that-ended-in-a-deadly-crash/. The fundamental issue, as always, is probable cause. You correctly point out that such pursuits are dangerous. Thus, initiating them only in the direst circumstances makes sense. However, as the above news report is an example of, officers may, in the moment, decide that this pursuit is worth it, despite the great risks it poses. I would argue that completely prohibiting vehicular chases would keep everyone in the community far safer as opposed to allowing it in specific cases.</p>	Original Language Retained: By limiting vehicle pursuits to very narrow circumstances, where the person in the vehicle being pursued poses an imminent threat of serious bodily harm to the community, JHPD has sought to strike a balance that can help ensure that vehicle pursuits occur very rarely and only in circumstances that implicate acute safety concerns. This approach seeks to ensure that JHPD can respond effectively to extreme circumstances, such as an active assailant, while prioritizing public and officer safety through stringent guidelines and accountability measures.
442 Traffic Control & Enforcement	a) IV. Uniform Enforcement: Potentially restrictive policy - JHPD officers cannot stop cars based on the smell of cannabis, registration issues, or certain equipment problems	Original Language Retained: As a university police department, the JHPD has a responsibility to ensure the safety and well-being of our diverse campus community while fostering trust and maintaining transparency in our law enforcement practices. Implementing a very detailed traffic enforcement policy, including strict prohibitions on pretextual stops and limiting the ability to conduct vehicle stops for vehicle equipment violations, seeks to promote public safety as well as constitutional policing through specific guidelines and accountability measures.

Policy Number and Title	Comment	Disposition
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?	Original Language Retained: As a university police department, the JHPD has a responsibility to ensure the safety and well-being of our diverse campus community while fostering trust and maintaining transparency in our law enforcement practices. Implementing a very detailed traffic enforcement policy, including strict prohibitions on pretextual stops and limiting the ability to conduct vehicle stops for vehicle equipment violations, seeks to promote public safety as well as constitutional policing through specific guidelines and accountability measures.
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.	Original Language Retained: As a university police department, the JHPD has a responsibility to ensure the safety and well-being of our diverse campus community while fostering trust and maintaining transparency in our law enforcement practices. Implementing a very detailed traffic enforcement policy, including strict prohibitions on pretextual stops and limiting the ability to conduct vehicle stops for vehicle equipment violations, seeks to promote public safety as well as constitutional policing through specific guidelines and accountability measures.
442 Traffic Control & Enforcement	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?	Original Language Retained: As a university police department, the JHPD has a responsibility to ensure the safety and well-being of our diverse campus community while fostering trust and maintaining transparency in our law enforcement practices. Implementing a very detailed traffic enforcement policy, including strict prohibitions on pretextual stops and limiting the ability to conduct vehicle stops for vehicle equipment violations, seeks to promote public safety as well as constitutional policing through specific guidelines and accountability measures.
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?	Adopted: Addressed in Procedures I (K).
460 Criminal Investigations	a) II. Follow-Up Investigation: Consider implementing requirement that officers/investigators notify victims/witnesses of investigation status; as written said notification is required "as appropriate" but not in all cases -	Adopted: Addressed in Procedures I (G) and II (F).
460 Criminal Investigations	b)III. Special Investigative Procedures: Consider adding more detail on process by which surveillance of specific individuals is approved (or not) by the CoP; the same goes for deception detection examinations	Adopted: Addressed in Procedures III (C) and (D).
460 Criminal Investigations	Pg. 6. I. H. Weird formatting on second bullet-point	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
460 Criminal Investigations	JHPD should not consider demonstrations and gatherings in the same category worth criminal investigation. Polygraphs are bad.	Adopted: Addressed in Procedures I (I), Procedures III (D).

Policy Number and Title	Comment	Disposition
460 Criminal Investigations	Pg. 7. I. I. Why are “Demonstrations and Assemblies and ‘Large gatherings “ considered under this category? These things are not inherently criminal or dangerous to always require a police presence. Concern of police stopping/quieting peaceful protests under the guise of ‘safety’.	Adopted: Addressed in Procedures I (I).
460 Criminal Investigations	III. D. There is A LOT of research showing the polygraphs are completely unreliable, do not show any evidence of guilt, can be fooled, and should not be admissible in courts. This is not something that JHPD should even be considering implementing in their criminal investigations. This is like using phrenology to determine capability!	Adopted: Addressed in Procedures III (D).
461 Custodial Interrogations	a) I. General: Consider strengthening language of “shall make all efforts to make an audio and visual recording of all Custodial Interrogations”	Adopted: Addressed in Procedures I (C).
462 Eyewitness Identification	a) V. Documentation: Consider strengthening language of “the identification procedure should be audio/video-recorded, if possible”	Adopted: Addressed in Procedures V (A).
463 Exculpatory & Incriminating Evidence	a) I. Member Requirements: Potential issues/conflict of interest emerging from required self-reporting of disciplinary history as part of a Required Court Disclosure, as well as lack of requirement to report Confidential Disciplinary Investigations of which the member is aware o Possibly mitigated by the Brady/Giglio Liaison responsibilities listed in II. Public Safety Accountability Unit Responsibilities	Adopted: Addressed in Procedures I (C).
464 Missing Persons Investigations	III: C. if the search/investigation is limited to the JH campus, should BPD be notified immediately if the child is thought to be missing?	Adopted: Addressed in Procedures III (C).
464 Missing Persons Investigations	VIII: C. When children are thought to be exploited in criminal activities, shouldn’t their interview be held by a different agency, such as the FBI who have more experience in these matters? There is a risk of psychological trauma associated with the interview process and it should be performed appropriately the first time.	Adopted: Addressed in Procedures VIII (B).

Policy Number and Title	Comment	Disposition
465 Response to Crimes of Sexual Violence	<p>Pg. 4 footnote 5: On the topic of using “victim” vs “survivor”. I believe that when speaking to the individual, the use of survivor is paramount. As a survivor myself, the term survivors isn't just “preferred by some individuals or groups”. There is ample research about the damage that the term victim causes. The use of the word “survivor” actually helps prevent PTSD and help in recovery to make the condition less serious. 50% of rape survivors develop PTSD. I am in that category. “Survivor” emphasizes that you are no longer in that situation, you are safe, you survived, which helps when PTSD is essentially a chronic activation of fight or flight where the mind does not recognize that the situation has passed and you are no longer in danger. “Survivor” is also crucial to combatting victim blaming, in particular, the cruel self blame experienced by those that did not fight back. Fight or flight has two other components- freeze or fawn... and those of us that experienced freeze and/or fawn, repeatedly blame ourselves, when it wasn't within our control. Our body did what it needed to in order to survive. Repeated use of the word “victim”, is unfortunately a form of revictimization and retraumatization.</p>	Adopted: Addressed throughout this directive and all related directives.
465 Response to Crimes of Sexual Violence	<p>Comments around accountability</p> <p>2) Indicate that information about the Public Safety Accountability Unit (PSAU) will be provided to victims proactively, at the forefront of interactions, with an explanation of victims' right and encouragement to submit a complaint.</p>	Adopted: Addressed in Appendix A, Johns Hopkins Resource Brochure.
465 Response to Crimes of Sexual Violence	<p>a) II. Victim-Centered Response: Potential conflict between policies requiring BWC footage and stated right of victims of sexual assault to ask that BWC be turned off during interactions with JHPD officers -</p>	Adopted: Addressed in Core Principles II (K) and JHPD Directive #433, Body Worn Camera, Procedures III (B).
465 Response to Crimes of Sexual Violence	<p>b) III. Initial Response: Nonsensical wording (“follow the victim's lead on if they would like them for not”; could read ‘follow the victim's lead as to whether or not they would like them’)</p>	Adopted: Addressed in Procedures III (J).
465 Response to Crimes of Sexual Violence	<p>VI. Additional Investigative Steps: Refers to a “campus ban” for sexual assault suspects; implementation/policy for this is not mentioned</p>	Adopted: Addressed in Procedures VI (I).
465 Response to Crimes of Sexual Violence	<p>Thorough in taking a trauma-informed survivor-centered lens. The policy is advised to include the following:</p> <p>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.</p>	Adopted: Addressed in Procedures X.

Policy Number and Title	Comment	Disposition
465 Response to Crimes of Sexual Violence	Comments around accountability 1) Clarify processes for when any part of the directive is not followed, including specific references to other Directives regarding complaints, accountability and discipline (who evaluates process, what is the bar for immediate dismissal, what if the plan for other responses to behavior is in conflict with directives?)	Adopted: Addressed in Policy Enforcement and JHPD Directive #350, Complaints Against Police Personnel.
465 Response to Crimes of Sexual Violence	Thorough in taking a trauma-informed survivor-centered lens. The policy is advised to include the following: 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).	Adopted: Addressed in Procedures X (B)(D)(J)(K).
465 Response to Crimes of Sexual Violence	8) designate a representative to serve on the JHU SVAC for the purpose of ensuring connectivity with student-led survivor supports and the expressed needs of survivors on an ongoing basis.	Adopted: Addressed in Procedures XI (A).
465 Response to Crimes of Sexual Violence	Thorough in taking a trauma-informed survivor-centered lens. The policy is advised to include the following: 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	Adopted: Addressed in Procedures X.
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 chose, and should be offered the opportunity to talk with a trained victim advocate (non PD) prior to deciding about a forensic exam.	Adopted: Addressed in Procedures VII (C)(D)(E).
465 Response to Crimes of Sexual Violence	Thorough in taking a trauma-informed survivor-centered lens. The policy is advised to include the following: 2) strike language related to "cooperate" in investigation and replace with "participate	Adopted: Addressed in Procedures VII (C).

Policy Number and Title	Comment	Disposition
465 Response to Crimes of Sexual Violence	<p>Thorough in taking a trauma-informed survivor-centered lens. The policy is advised to include the following:</p> <p>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)</p>	Adopted: Addressed in Procedures X.
465 Response to Crimes of Sexual Violence	<p>Thorough in taking a trauma-informed survivor-centered lens. The policy is advised to include the following:</p> <p>7) adopt in "principles" a "universal education" approach about support services -- recognize that many may not immediately reach out for care, and specifically, encourage survivors to seek support services even potentially after the event, using a universal education approach that raises awareness about available supports and encourages their use, particularly in the days and weeks following the incident</p>	Adopted: Addressed in Core Principles II (G).
465 Response to Crimes of Sexual Violence	<p>In further response, SVAC also refers to the individual comments submitted by [REDACTED] of BSPH.</p>	No Actionable Recommendation.
465 Response to Crimes of Sexual Violence	<p>The following feedback is submitted on behalf of the Provost's Sexual Violence Advisory Committee (SVAC). The comments were composed by SVAC members and compiled by the SVAC's Policy and Communication Subcommittee. This feedback is also being submitted to [REDACTED] via e-mail. Comments on training for JHPD members</p> <p>1) Training should occur at least annually and in person.</p>	Adopted: Addressed in Procedures X.
465 Response to Crimes of Sexual Violence	<p>2) Training contents should be prepared, reviewed, and facilitated by gender-based violence experts prior to use.</p>	Adopted: Addressed in Procedures X.
465 Response to Crimes of Sexual Violence	<p>3) The material used for trainings should be made available to the public.</p>	Adopted: Addressed in Procedures X.
465 Response to Crimes of Sexual Violence	<p>4) Recommended additions to the training list of topics:</p> <ul style="list-style-type: none"> -Functioning as a responsible employee -Commonly used resources 	Adopted: Addressed in Procedures X (D)(J).
465 Response to Crimes of Sexual Violence	<p>1) Consider linking to OIE online policies directly rather than listing definitions from those policies, as the definitions and other content are often updated.</p>	Adopted: Addressed in Purpose and Related Resources.

Policy Number and Title	Comment	Disposition
465 Response to Crimes of Sexual Violence	2) Include method for survivors to contact JHPD member in charge of their case, and timeline/ accountability protocols for prompt officer responses.	Adopted: Addressed in Procedures III (N).
465 Response to Crimes of Sexual Violence	3) In Victim Centered Response section: -Part H, are there other crimes (e.g. trespassing) for which JHPD members will be directed to not charge the victim for, or is this an exhaustive list?	Adopted: Addressed in Core Principle II (I).
465 Response to Crimes of Sexual Violence	3) In Victim Centered Response section: Part E, indicate working with an advocate and receiving a SAFE exam are free of charge. An advocate can work to find additional no- and low-cost resources as well.	Adopted: Addressed in Core Principles II (J).
465 Response to Crimes of Sexual Violence	4) If there are policies for technological abuse (e.g. “Revenge porn” - threat of sharing or actual sharing of intimate photos or videos of an intimate partner as a method of coercion or manipulation), link them somewhere in the directive, noting that cases of revenge porn or other online sexual harassment should be handled in a victim-centered, trauma-informed manner. Because these scenarios can be common in abusive relationships, consider adding a scenario including technological sexual harassment or revenge porn to trainings. Recommend connecting victims to resources on JHU Resources brochure.	Adopted: Addressed in Procedures VI (K) and Definitions.
465 Response to Crimes of Sexual Violence	5) In Victim Center Responses of in Appendix B, clarify: The victim has the right to decline any part of the medical care for any reason and by any officer. A victim may not want to be touched by any officer or may prefer to wait for an officer of a different gender or wait for an EMT.	Adopted: Addressed in Procedures III (B).
465 Response to Crimes of Sexual Violence	6) Under Definitions; 4th degree sex offence, the paragraph includes the following language: “It is the sexually-oriented act of groping, caressing, feeling, or touching of the genital area or anus or breasts of the female victim. Can we either remove of the female victim here, or remove this sentence altogether? It does not seem necessary to include, and can be read as if a 4th degree sex offense does not apply to victims who are male or gender non-binary.	Original Language Retained: This definition is a direct quote from Maryland case law (Travis v. State, 218 Md. App. 410, 465, 98 A.3d 281, 313 (2014)).
465 Response to Crimes of Sexual Violence	7) Indicate that locations of victims will be kept confidential and specifically will not be shared with offender or other parties.	Adopted: Addressed in Core Principles II (H).

Policy Number and Title	Comment	Disposition
465 Response to Crimes of Sexual Violence	<p>In paragraph II.A on victim-centered response to crimes of sexual violence there is a list of characteristics that should not be a determining factor in treating an individual with respect. Race/ethnicity is not on that list. There are a 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 as 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.</p>	Adopted: Addressed in Core Principles II (A).
465 Response to Crimes of Sexual Violence	<p>Good evening, I am writing to suggest a change to JHPD Directive #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 a "rape," the personnel should not take ownership of the victim's narration 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 labels.</p>	Adopted: Addressed in Procedures III (J).
466 Hate & Bias Incident Investigations	<p>a) I. Identifying Hate/Bias Crimes and Incidents: Consider removing "the officer's knowledge of the community where the incident occurred" as a contributing factor to the classification of an incident as a hate/bias crime -</p>	Adopted: Addressed in Procedures I (C).
466 Hate & Bias Incident Investigations	<p>The question I will ask here is similar to one I asked about another section. What will the community be able to know about the accreditation or approval or general validity of the training regarding hate crimes? Is the training internally developed? Is there any input from the community or any other external body that specializes in understanding hate crimes and how to deal with them?</p>	Reflected: JHPD Directive #305, Training & Professional Development, details accreditation and training.
467 Evidence Collection & Preservation	<p>V. D: How do we ensure that photos taken on personal devices are stored safely or deleted in a timely manner?</p>	Adopted: Addressed in Procedures V (D).
467 Evidence Collection & Preservation	<p>The definition of jewelry used in this directive is clearly focused on the monetary value. It is quite possible that some of what people consider to be jewelry does not necessarily have a lot of monetary value but may have significant emotional value. (The definition focuses on gems and precious metals.) I would hope that jewelry that may have quite a bit of emotional value would be treated with as much care as jewelry that has potentially high monetary value. Particularly because at first glance, there could be some forms of jewelry that are plated with precious metals rather than being solid precious metals that would not have the same value.</p>	Adopted: Addressed in Definitions.

Policy Number and Title	Comment	Disposition
480 Critical Incident Response & Management	Critical Incident and Response Management and Active Assailant Response policies have redacted detailed procedures. How will the community know what to do, and where is the transparency in how the JHPD will handle such situations?	Original Language Retained: Because the disclosure of JHPD’s Active Assailant and Critical Incident and Response Management training and procedures could run a risk of 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, the procedures will not be made publicly available in accordance with MD Code, General Provisions, § 4-352. This is consistent with many other police departments.
481 Active Assailant Response	If the policy is cloaked for the purpose of safety, by what means is such a policy modified?	Reflected: JHPD Directive #202, Written Directive System, details the process for modifying policies. Because the disclosure of JHPD’s Active Assailant and Critical Incident and Response Management training and procedures could run a risk of 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, the procedures will not be made publicly available in accordance with MD Code, General Provisions, § 4-352. This is consistent with many other police departments.
486 Assemblies, Demonstrations & Disruption of Campus Activities	The criminal charge of Wanton Trespass (p. 13) proposed for relatively minor offenses such as disrupting a meeting is excessive and violates the university’s commitment to free speech and assembly. Such charges should not be part of this directive.	Adopted: Addressed in Procedures IV (C).
486 Assemblies, Demonstrations & Disruption of Campus Activities	The definition of disruption (p. 3) is broad and encompasses protected acts of free expression. Disruption is conflated or identified with more serious civil disturbances in determining responses.	Adopted: Addressed in Definitions.
486 Assemblies, Demonstrations & Disruption of Campus Activities	In this section, the term “disruption” is defined broadly enough to include brief interventions near or in classrooms or other campus activities by people exercising their First Amendment rights. If these interventions are punctual, it is not clear that they could be said to interrupt campus activities. For that reason, language such as the following constitutes an infringement on the First Amendment rights of protesters: “Officers shall seek to prevent and de-escalate disruptions..” “Officers shall not interrupt a speaker, unless ...the assembly or demonstration constitutes a disruption”	Adopted: Addressed in Definitions.

Policy Number and Title	Comment	Disposition
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>The core principles state that we have the right to criticize law enforcement without being subject to retaliation but this hasn't even been true before the JHPD is established, as community members have in fact been subject to retaliation for exercising their right to freely participate in protest. So how is it that adding the JHPD to the mix will guarantee the protection of our rights when they're not even protected in the first place????</p> <p>Procedure B states that "officers shall not, when feasible, restrict the rights of any person to gather" IT SHOULD ALWAYS BE FEASIBLE TO DEFEND PEOPLE'S RIGHTS. Who will determine when it's not feasible?? The officers themselves??</p>	Adopted: Addressed in Procedures I (B).
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>Procedure P states that officers may arrest a person based on "the officer's own knowledge" of probably cause of the person committing a crime. This very much opens the door for officers to make unjustified arrests, police officers are entitled by this procedure to lie and make indiscriminate arrests.</p>	Reflected: JHPD Directive #424, Arrests & Alternatives to Arrest, Procedures V details the probable cause standard.
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>a) I. Response to Demonstrations and Assemblies: Consider removing "if feasible" from statement "Officers shall not, when feasible, restrict the rights of any person to gather at or near the object of the assembly or protest"</p>	Adopted: Addressed in Procedures I (B).
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>V. Disruption of Campus Activities, Events, and Classes: Consider clarifying the circumstances under which responsibility for civil disturbances can be transferred to the BPD, especially in emergent situations -</p> <p>c) The same goes for mass arrest situations</p>	Adopted: Addressed in Procedures IV (H)(J).
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>d) V. Disruption of Campus Activities, Events, and Classes: Potential conflict between inability to record protected speech via BWC for intelligence purposes and requirement to record dispersal orders via BWC -</p>	Adopted: Addressed in Procedures I (Y).

Policy Number and Title	Comment	Disposition
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>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.</p>	<p>Original Language Retained: The JHPD is committed to the least intrusive and most appropriate enforcement measures. Our policies prioritize respecting freedom of expression and view de-escalation and avoidance of arrest as fundamental principles of our policing model. De-escalation techniques and harm reduction strategies are proven methods to reduce the risk of injury and conflict, benefiting both officers and the community. These strategies seek not to tie officers' hands but, rather, to equip them with a broader set of tools to manage situations effectively and safely.</p> <p>Regarding the enforcement of laws and maintaining order, JHPD is committed to developing policies in alignment with legal standards and best practices in modern policing. We recognize the importance of maintaining clear pathways and access to buildings and will enforce these regulations as appropriate, always with a focus on safety and respect for all individuals involved. We believe that by working together, we can achieve a safer, more inclusive campus for everyone.</p>
486 Assemblies, Demonstrations & Disruption of Campus Activities	<p>I have quite a few feedbacks but I'll address two of them for now. I'll start by saying that Baltimore City still does not have the full implementation of local control of their police department and this MOU nor this police force need not to exist.</p> <p>With Policy number 486, it is personal. In 2019 I've witness firsthand the threats leveled against Tawanda Jones, a well-known activist . I also witnessed intimidation tactics leveled against students and community members during the Garland Hall 2019 sit-in. Currently, protests are ongoing as students and residents are calling for a Ceasefire in Gaza. According to the draft of 486, "it requires JHPD members to make reasonable efforts to protect demonstrators and assemblers and preserve their ability to engage in assemblies and demonstrations on campus. It lists the Campus Area "includes the public property that is immediately adjacent to the campus, including a sidewalk, a street, or any other thoroughfare; and a parking facility as inclusions of the campus areas. I read through the entire policy; when I got to the part of "Suspected violations of this Directive should be reported to the Public Safety Accountability Unit I went to Policy 350.</p> <p>Policy 350 "Complaints Against Police Personnel" , there needs to be the transparency of the complaint made available to the public. Currently, the biggest issue is the public not aware of an egregious complaints due to at least immunity and at worse backlog of the list of complaints. I do not see the timeframe of when complaints are made to the public (at the request of the individual filing the complaint). It is equally as important that the public have access to complaints without going through a multitude of barriers to find out the results of the complaints.</p> <p>These are all that I have at the moment, thank you for your time and attention.</p>	<p>Reflected: JHPD Directive #210, Records Management, details what information JHPD will make publicly available.</p>

Policy Number and Title	Comment	Disposition
Global	<p>Violation of Current Law - Within these policies are some very explicit violations of current law. A major example of this is JHPD Policy #352, Expedited Resolution of Minor Misconduct. This policy is a violation of COMAR 12.04.10, Uniform State Disciplinary Matrix which states that the Uniform State Disciplinary Matrix is required for all matters that may result in discipline of a police officer which is not reflected in JHPD Policy #352. In addition, COMAR 12.04.10 states that the imposition of discipline shall not be influenced by the high- or low-profile nature of the police misconduct which is violated by the core principle of JHPD Policy #352. Additionally, this does not mean that JHPD can negotiate the penalty, as it states in JHPD Policy #352. The entire purpose of the Statewide Disciplinary Matrix is so that all police officers who commit misconduct are disciplined in the same manner.</p>	<p>Original Language Retained: Through comprehensive review and based on research and benchmarking with peer departments, JHPD directives regularly exceed the minimum legal requirements.</p> <p>JHPD supports the proper application of the Uniform State Disciplinary Matrix. While the Matrix's purpose is to ensure uniformity in discipline, the Matrix does not strictly mandate a specific penalty for each violation category. Instead, with the various categories, there are ranges of penalties that can increase or decrease based on aggravating and mitigating factors. JHPD Directive #352, Expedited Resolution of Minor Violations, applies only to Category A of the Statewide Police Disciplinary Matrix where minimal investigation and adjudication are required, the officer does not contest the allegations, and where the alleged violation does not involve a member of the public (i.e., violation associated with improper attire and grooming [uniformed/non-uniformed]; late for duty assignment; failure to properly care for agency vehicle, including but not limited to vehicle inspection and maintenance care; loss of agency property [excluding weapon and radio]; and parking violations, only).</p> <p>This directive is consistent with the Matrix, which permits the lowest level of disciplinary proceedings for "conduct that has or may have a minimal negative impact on operations or professional image of the law enforcement agency." JHPD Directive #352 will be used only as a mechanism to efficiently resolve cases alleging minor internal misconduct where extensive investigation and adjudication are unnecessary and not required by the Matrix. For these reasons, we are confident that JHPD Directive #352, as well as our other related directives, do not violate Maryland law.</p> <p>It is worth noting that JHPD Directive #352 was modeled after Baltimore Police Department (BPD) Policy #321, Expedited Resolution of Minor Violations, which was adopted during the consent decree process. According to BPD's policy, BPD utilizes an Early Resolution process for certain categories of misconduct cases that do not implicate allegations pertaining to conduct or performance involving a member of the public.</p>
Global	<p>Policies vs. Directives - All policies need some significant reworking for a combination of issues including spelling and punctuation errors, formatting inconsistencies, definition inconsistencies, faulty definitions, duplicative information, and incorrect information. It is evident that most of these were not written by individuals who understand the development and drafting of policies. There is a reason why JHU Graduate Government Studies professor Dr. Paul Weinstein, Jr. wrote the book, "The Art of Policymaking:"</p>	<p>Reflected: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual. During this process, dead or inaccurate links were corrected, as were formatting inconsistencies and grammatical, spelling, and punctuation errors.</p> <p>The policy development team personnel have extensive experience working on police policies. The team includes the former chief counsel for the Baltimore Police Department and Pennsylvania State Police, the former deputy director of the Police Executive Research Forum and policy writer for the BPD, a former member of the consent decree implementation team at the BPD who serves as a consultant to several consent decree monitoring teams, and a former police chief, who also served as The Commission on Accreditation for Law Enforcement Agencies' assessor and team leader. In addition, every directive is reviewed and edited by a team from 21st Century Policing Solutions and the National Policing Institute.</p>

Policy Number and Title	Comment	Disposition
Global	<p>Citing Code Incorrectly and Links - Some other major errors throughout these “Draft Policies” include only portions of the Maryland Code being included when the entire subsection applies to the corresponding policy. Again, there is no excuse nor reason for The Johns Hopkins to have such incorrectly and poorly drafted policies with the resources available to them.</p> <p>As a side note, the way that one is to draft the citation of the Maryland Code is done incorrectly throughout the documents; there is not a single instance where it is drafted correctly. More importantly, several of the Articles and Sections of the Maryland Code and United States Constitution cited are not applied correctly or are even relevant to the draft policies. These must be re-reviewed for accuracy immediately.</p>	<p>Reflected: There were some typographical errors concerning the corresponding Maryland Code provisions. For instance, in JHPD Directive #350, Complaints Against Police Personnel, MD Code, Public Safety, § 3-108 was referenced when it is now § 3-107. That said, the provisions themselves accurately reflect the statutory requirements. All directives were reviewed to ensure every code provision number indicated is correct.</p> <p>In the JHPD directives, the Maryland Code is consistently referred to as the “MD Code,” instead of the full legal format cited, “Md. Code Ann.” The stylistic choice was to use “MD Code” for ease of use and reading. This is also a format commonly used by Westlaw. A provision has been included in JHPD Directive #202, Written Directive System, explaining that the Maryland Annotated Code is referred to as “MD Code”.</p>
Global	<p>Citing Code Incorrectly and Links - In addition, at no point is Baltimore City Code directly cited which Johns Hopkins and JHPD would be required to uphold; there is only a general mention of upholding “local ordinances” which is not sufficient enough in policies. It should also be noted that some of the links provided in the policies are dead links, are missing links, or are leading to incorrect webpages.</p>	<p>Reflected: Regarding the Baltimore City Code, JHPD is obligated to enforce and uphold the Baltimore City Code and does not take that obligation lightly. For example, it is referenced in JHPD Directive #424, Arrests and Alternative Arrests, like BPD Policy #803, Civil Citation Procedures. After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual. During this process, dead or inaccurate links were corrected, as were formatting inconsistencies and grammatical, spelling, and punctuation errors.</p>
Global	<p>Chain of Command - Another inconsistency is the reference to JHPD utilizing “chain of command” while each “Reporting Violations” does not follow a chain of command. Chain of command has been proven to be flawed and promotes secrecy in communication, contributes to low morale, and hinders innovation.</p> <p>Because JHPD has an opportunity to lead the way towards better policing and progressive practices, I would urge the rethinking of using a chain of command. The institution has a natural form of hierarchy and if there is a true will for members to practice active bystandership, eliminating the chain of command and embracing the open-door policy that the rest of the institution has would be a large step in that direction.</p>	<p>Adopted: Addressed in JHPD Directive #103, Rules of Conduct, Rules & Regulations, IV (B)-(D): JHPD has intentionally removed "Reporting Violations" from the JHPD chain of command (and all misconduct reporting and investigation) in the draft directives and mandated a duty to intervene to prevent misconduct and promote active bystandership.</p> <p>Unlike any other agency in Maryland, the Public Safety Accountability Unit (PSAU) exists outside of the JHPD chain of command and will receive all reports of violations. The PSAU is an independent investigative unit of the Office of Johns Hopkins Internal Audits that conducts investigations and assessments of incidents and complaints related to using force and misconduct.</p> <p>To the extent that any provision of the draft directives is inconsistent, it has been adjusted accordingly, including the chain of command provision of JHPD Directive #103, Rules of Conduct.</p>

Policy Number and Title	Comment	Disposition
Global	<p>Creating A Militarized Police Force - The policy related to the type of guns that are used must be revised and/or removed. JHU should not be trying to create a militia or a militarized group of people. According to the FBI, 8% (4) of all active shootings in 2022 happened on an educational campus and 2% (1) in health care. Of the total number of active shooters, 0.18% were engaged with by law enforcement and 16% of the incidents had citizen intervention and/or confrontation which resulted in the end of the incident.</p> <p>The likelihood of an officer needing a high-powered, machine-gun quality weapon such as the Colt M4 Carbine is incredibly slim, let alone in every vehicle. The way in which JHPD Policy #404 is drafted is not indicative of a "Patrol Rifle Program" which is what JHPD identified and cited comparable Maryland institutions utilize. While in the BPD and sister police departments there are cars equipped with rifles, it's not every car and those cars are sent out for specific purposes, not general patrol.</p>	<p>Original Language Retained: It is critical to emphasize that JHPD officers will not carry rifles as a matter of course. Instead, rifles will be securely locked and stored in JHPD vehicles, accessible only under appropriate and very rare circumstances. Our officers will undergo extensive training that emphasizes de-escalation techniques and ensures that any use of force is proportionate, necessary, and reasonable to the situation. Additionally, every instance of accessing firearms will be tracked, documented and reviewed to ensure accountability and transparency.</p>
Global	<p>Creating A Militarized Police Force - Additionally, JHPD incorrectly references the Law Enforcement Officers Safety Act of 2004 (LEOSA), National Defense Authorization Act of 2013, "officers may wear and carry a concealed firearm anywhere within the United States of America, whether on- or off-duty, provided they do so in compliance with the Maryland law, state, and local ordinances, and JHPD rules and procedures" (JHPD Policy #402, VI. Special Situations, E. Off-Duty & Extra-Jurisdictional Carry). LEOSA, in the State of Maryland, is only for retiring and retired law enforcement officers. In the context that JHPD has referenced LEOSA, it is not relevant nor correct. The National Defense Authorization Act of 2013, even as amended, is strictly about funding for the Department of Defense, military construction authorizations, and the Department of Energy National Security Authorizations and Other Authorizations which has nothing to do with JHPD in any capacity.</p>	<p>Original Language Retained: As noted by the Maryland State Police, "the Law Enforcement Officers Safety Act (LEOSA) permits the nationwide carrying of concealed handguns by qualified current and retired law enforcement officers and amends the Gun Control Act of 1968 (Pub. L. 90-618, 82 Stat, 1213) to exempt qualified current and retired law enforcement officers from state and local laws prohibiting the carry of concealed firearms."</p> <p>Thus, the context in which JHPD Directive #402, Use of Force, cites LEOSA for current officers is correct. The reference to the National Defense Authorization Act of 2013 is also correct, as it amended LEOSA.</p>
Global	<p>Civilian Review Board and Police Accountability Board - The state legislation mandates that the JHPD is held accountable by the Civilian Review Board (CRB). The policies released have procedures for reporting and investigations for the CRB. However, the MOU with the Baltimore Police Department and the new legislation passed by the City Council to create the Police Accountability Board (PAB) mandates that the JHPD is held accountable by the Police Accountability Board. In conversations with the Baltimore City Law Department, it is clear that JHPD has to work under both entities. The current JHPD policies exclude any mention of the PAB.</p>	<p>Reflected: JHPD Directive #350, Complaints Against Police Personnel, and JHPD Directive #354, Civilian Review Board Complaint Procedures, detail investigation, reporting, and disciplinary processes.</p>

Policy Number and Title	Comment	Disposition
Global	<p>In Conclusion - It would behoove Johns Hopkins to get this far in the process of gaining the ability to have their own police department and working through the process of development to not take the time required to draft consistent, cohesive, and thoughtful policies. Due to the incredibly poor state of the first tranche of "Draft Policies", I would urge JHPD to revisit each of the policies, line by line, as we have. JHPD must revise them to be accurate, consistent, and in the manner, they should be drafted. I have included the several "Draft Policies" edits as an example, Appendix C, but not all the edited policies to afford JHPD with the opportunity for course correction.</p>	<p>Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.</p>
Global	<p>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. (THIS MAY APPEAR SOMEWHERE ELSE? - TBD)</p>	<p>Adopted: Addressed in JHPD Directive #103, Rules of Conduct Procedures XII.</p>
Global	<p>CONDUCT & RESPONSIBILITY #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</p>	<p>Adopted: Addressed in JHPD Directive #103, Rules of Conduct.</p>
Global	<p>Issues consistent throughout the "Draft Policies": Need to fix the incorrect drafting of the Maryland Annotated Code.</p>	<p>Original Language Retained: In the JHPD directives, the Maryland Code is consistently referred to as the "MD Code," instead of the full legal format cited, "Md. Code Ann." The stylistic choice was to use "MD Code" for ease of use and reading. This is also a format commonly used by Westlaw. A provision has been included in JHPD Directive #202, Written Directive System, explaining that the Maryland Annotated Code is referred to as "MD Code."</p>
Global	<p>Issues consistent throughout the "Draft Policies": Need to correctly update "Directive" to be "Policy."</p>	<p>Original Language Retained: The terms "directive" and "policy" are used interchangeably.</p>
Global	<p>Issues consistent throughout the "Draft Policies": Acts, agencies, councils, organizations, etc. are not correctly named (i.e., JHPD Policy #403, Procedures, I. Approval of Firearms, "...Baltimore Criminal Justice Training Council" is not the name of the Council. It is called the Criminal Justice Coordinating Council, or CJCC).</p>	<p>Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.</p>
Global	<p>Issues consistent throughout the "Draft Policies": Formatting inconsistencies throughout all policies.</p>	<p>Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.</p>
Global	<p>Issues consistent throughout the "Draft Policies": Grammatical, spelling, and punctuation errors.</p>	<p>Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.</p>

Policy Number and Title	Comment	Disposition
Global	Issues consistent throughout the "Draft Policies":Alphabetize the "Definitions."	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
Global	Issues consistent throughout the "Draft Policies": The "Blueprint for the Policy Development Process" does not need to be included in all the policies since it does not change.	Adopted: The cover memorandums that prefaced each draft policy, which provided background context for the public as they reviewed them, have since been removed to improve readability.
Global	Issues consistent throughout the "Draft Policies":Most of the links are either linked to incorrect webpages or are linked to dead webpages.	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual. During this process, dead or inaccurate links were corrected, as were formatting inconsistencies and grammatical, spelling, and punctuation errors.
Global	Issues consistent throughout the "Draft Policies": Incorrect labeling of own JHPD policies (i.e., JHPD Policy #407 title on the JHU website,throughout other draft policies, and Policy #407 Cover Memorandum states, "Use of Force Review, Assessment & Investigation", but the title on the Policy is "Use of Force Reporting, Review & Assessment").	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
Global	Issues consistent throughout the "Draft Policies":When something is defined under "Definitions", then it would be capitalized throughout the policy it is defined under. If it is not defined under the policy, it should not be capitalized.	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
Global	Issues consistent throughout the "Draft Policies": Writing out any numbers followed with the number in parenthesis when not related to citing law and other policies.	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
Global	Issues consistent throughout the "Draft Policies": Decide if going to use acronyms–inconsistent throughout the policies.	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
Global	Issues consistent throughout the "Draft Policies":I urge you to take a deep look at the policies line by line based on what we've done. We have not addressed everything, and you must do the work to review these thoroughly based on the concerns we have brought to your attention.	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.
Global	Issues consistent throughout the "Draft Policies":When an acronym is being used, it needs to be written out prior to strictly using the acronym as readers of the policies may not know what the acronym stands for.	Adopted: After the JHPD Policy Manual was finalized, Westchester Publishing Services copyedited and proofread the entire manual.

Policy Number and Title	Comment	Disposition
Global	<p>An observant member of the Policy Review Committee recently raised a concern that to date, 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:</p> <ul style="list-style-type: none"> 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 personnel within a medical care setting. f. JHPD access to JHH restricted areas. g. Medical records access, handling and privacy. <p>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</p>	<p>Adopted: Addressed in JHPD Directives #210, Records Management, Procedures XVI; #409, Field Interviews, Investigative Stops & Pat Downs, Procedures III (F); #411, Search & Seizure, Procedures I (F).</p>
Global	<p>Policies vs. Directives - From the start, stating that these are "Draft Policies" and then noting in all 42 Cover Memorandum's that, "the draft JHPD policies (hereinafter referred to as 'directives')..." is confusing as a directive and a policy are, while similar, not the same thing. Policies explain what someone is expected to achieve while directives explain how someone is to meet or exceed the policy. It is clear throughout the policies that this confusion is taking place. An example of this would be the Fair & Impartial Policing policy, BPD Policy 317, JHPD Policy #106.</p>	<p>Original Language Retained: The terms "directive" and "policy" are used interchangeably.</p>
Global	<p>Policies vs. Directives - Another example of this is how within the first 20 policies, or roughly the first 300 pages, the Commission on Accreditation for Law Enforcement Agencies (CALEA) is incorrectly applied to the policies 78% of the time. While the general public and a reasonable person may not know this nor have easy access to the CALEA standards and manuals, my office does.</p>	<p>Reflected: All Standards for Law Enforcement Agencies references were reviewed. Corresponding standards were inserted in the policy or policy statement when relevant, with the goal of being over-inclusive and transparent.</p>

Disposition Report updated on August 14, 2024.

General Questions and Feedback

Feedback included questions and comments on specific topics, some related to the draft policies and some related to the JHPD more broadly.

In reviewing all responses submitted during the public comment period, the JHPD policy development team encountered some instances where comments were submitted verbatim multiple times. For example, one comment was submitted a total of 105 times. For readability and brevity purposes, those comments have been included only once with a note indicating the original total submission number. All other comments have been included as submitted.

Comment

2. It is ludicrous to start with the statement: "Johns Hopkins Public Safety is a progressive leader in campus safety, working collaboratively with our community of students, faculty, staff, neighbors, and patients", when the head of the Office of Public Safety has been repeating for more than a year: "I have heard many good arguments in favor of this police force, but I haven't heard a single valid argument against it." This is evidence that this administration is tone-deaf to what the community is saying. They are just NOT LISTENING.

How will this police be progressive if they don't think there is any reason to be against it?

Is this policy consistent with the values and needs of the community?

Though I deeply disagree with it, instituting a new police force does seem like a move consistent with the needs and values of Hopkins if we admit that those needs and values involve maintaining a strict and potentially lethal separation between Hopkins and Baltimore residents more widely.

Does this policy help JHPD safely carry out its stated mission?

Though I deeply disagree with it, all of the attached policies help the JHPD to carry out its mission of bringing more surveillance and violence to Baltimore. I do not believe it is possible for police to participate in a safe campus environment. Is this policy understandable? Are there any points that need clarification?

I am at a loss as to why this policy has been created after so many years of police violence in Baltimore and so much activism on behalf of students and community members—though I can see why you paused for two years so that people would forget the moral clarity that galvanized the sit-in. Is there anything that needs to be addressed in this policy that isn't currently reflected in the draft?

Yes—how on earth can you say that these policies will be safe when the "national and local higher education institutions that are based in comparable environments" have already shown that campus police can kill, that they reproduce racism with just as much vigour as any municipal police force?

3. This draft is just about using buzz words but the JHU administration has nothing to prove that they can be trusted. On the contrary, they report peaceful protesters against the very policies of the University, they claim a 'quiet majority' wants this police without showing any data (yet, they refuse a referendum), and they control the Police Accountability Board which is supposed to be their poster child for transparency.

More importantly, the JHPD website and all public information the Public Safety puts out lies about the unique nature of the Hopkins private police: it does NOT have any 'peer' to be compared to. The university they always cite are PUBLIC and the private campus forces do NOT have jurisdiction on public streets.

How in the world does Hopkins think we should trust it to lead the unheard of concept of a 'progressive police' when they act so blatantly against transparency and truth? By the way, speaking of lack of transparency:

According to the numbers associated with the draft policies, only half of them have been posted so far: the two tranches are still missing at least 93 of the total. When will you post the remaining policies OR fix the numbers? Not a single word has been shared about the fact that only half the policies have been made public. Hopkins must publish them all. I am glad that it means there will automatically be 60 more days for public comments.

JHPD is strongly needed to maintain safety and well being of employees specially 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.

Comment

Thank you for this opportunity to comment on the JHPD draft policies. As they have not been posted yet in their entirety, we need to wait until we receive the complete policies to fully analyze them.

In the meantime, we can assess if JHU is indeed capable to honor its ambitious claims of 'reinventing public safety' and 'implementing modern, progressive policing policies'. The only basis for our trust in this idyllic police force is whether or not JHU is currently able to follow its own rules.

1. In that regard, using the reality at work with the JH Police Accountability Board (PAB), the striking feature is that it not only violates the spirit of the Community Safety and Strengthening Act, but also its letter. The PAB members, supposed to be 'responsible for sharing community concerns directly with JHPD leadership' are actually forced to be several steps removed from the community, buried under layers of JHU administration.

a. The October 2023 PAB annual public meeting revealed that community members could not see their PAB members, could not hear them, and could not engage in a dialogue.

The regular public meetings do not allow any direct interaction with the Board members (no chat, no Q&A). Community engagement is meaningless.

b. The email address to contact the Board is managed by the administration whereas Board members clearly asked last year to have an independent and direct management of their own email.

Dr. Bard unilaterally refused, claiming efficiency reasons. The independence of the Board is meaningless.

c. Under scrutiny at the beginning, the first PAB included people with a wide range of opinions on how to conduct public safety at Hopkins: yet, the most vocal opponents have not been renewed, without any explanation. They have been replaced by new members embracing the JHPD, who, by their very views, cannot anticipate the problems more cautious and critical people can bring into the discussion. Hopkins entirely controls who is on the Board. Accountability is meaningless.

d. Community members versed in the law have already pointed out several violations of the Open Meetings Act during the PAB meetings.

2. Other areas are of grave concern regarding JHU's ability to honor its pledge of transparency and accountability:

a. There has been no public information about security officers who were reported for violent, racist rhetoric on social media and discriminating behavior (one is still listed as a Hopkins employee on LinkedIn). Transparency is meaningless if it is selective.

b. The Student Code of Conduct has been used in recent years to single out graduate students during peaceful protests. Even when they are not found guilty of any violation at the end of the process, it has a chilling effect, meant to scare and discourage dissent on campus

Peaceful protestors have been physically removed against the rules security officers were under.

All the efforts and money invested in integrating progressive policies should not be wasted on a heavily armed private police: it will hopefully be put to better use for Baltimore City and other urban areas who deserves so much the relief of better trained and less militarized police force.

I applaud all the other Public Safety initiatives that are meant to minimize the presence and use of police force.

Dear Dr. Bard,

Thank you so much for your invitation to comment on the JHPD draft policies. We look forward to reading them carefully and sharing our feedback.

Would you be able to answer the following three questions?

1. Is the feedback form on the Public Safety website automatically shared with the Accountability Board?

As written on the Accountability Board webpage, their first statutory charge is:

"Sharing community feedback directly with JHPD leadership;"

As such, they are the interface between the public and the office of Public Safety. We expect all public comments to go to them as well, at the same time it reaches the office of Public Safety.

2. If they do not receive community feedback right away, will they only read them at the end of the process when they are all public to anyone? At that time, will the Accountability Board still have a role in refining the policies?

I'm concerned that the JHAB's window to participate in the making of the policies may have closed already.

Comment

3. Can you reassure us that no recruiting for the future JHPD has started yet? Are we still exclusively in the phase of finalizing the draft policies or have recruiting efforts already begun one way or another? I have included the Accountability Board email to this message and my colleagues on the Policing committee of the [REDACTED].

"In answer to Question 1 above:

The JHPD is in absolute contradiction with the values of the Johns Hopkins University: there is no need for the heavily armed private police this administration is trying to force onto the entire community, including public streets that should be the exclusive jurisdiction of a public force.

At least for the Homewood campus, community associations are in majority against the creation of the JHPD. The weapons the JHPD plans on using has absolutely no justification for the purposes it states and will endanger the community, instead of ensuring safety. "

4. Against all research on guns and weapons (including coming from its own center on gun violence), which shows that the more guns are out, the more deaths and injuries happen, this private police will be heavily armed: the storage will be in Baltimore County... Through transport, errors, accidents, the unexpected in general, those weapons will land in the wrong hands, besides already being in the hand of police officers who will not be able to modify their previous training - unless it takes years to reform how they've been trained to use them. NOTHING in the Community Safety and Strengthening Act says the police should be armed. The weapons described and their numbers are a disgrace to this university. They are disproportionate to the level of crime that happens around our campuses. The day this police starts working at Homewood, I will quit my job and will make it known why. I will not be the accomplice of the subterfuge to pretend the JHPD is needed for the safety of the community -when it is mainly to control real estate around Hopkins and assuage the fears of potential families of future students about the safety of Baltimore. The fact is that JHU constantly receives more applications every year, so there is no shortage of excellent students. The ACLU published a study of private police forces across the nation and revealed that the main purpose is expansion of real estate on the part of the universities. It is immoral of JHU to be so devious about why they want this police and to put so much money into creating it (flowing cash for lobbying in 2019 after their failed attempt in 2028 in Annapolis, bribing the since disgraced Mayor at the time, and exerting pressure on Delegates and Senators who spoke against the police. They contacted each big donor of opponents to the JHPD, and dried up their funding, to scare anyone else from standing up against the JHU plans. They also need an army of lawyers to protect the institution from 'incident's, which will inevitably happen.)

All this money should be used to make the BPD stronger, better trained, better educated, in the long run. There is no quick fix to crime anywhere and the JHPD is just a smoke-screen that will not resolve any deeply rooted issue. I applaud and embrace all the other forms of support and initiatives that the Office of Public Safety has already set up, besides the armed private police. I will fight the JHPD until this unconscionable project is dead.

Thank you for reading my comments and including them in the 21CP report.

Cops are never the solution. NO TO JHPD! FUCK UR COPS!

Thank you for the opportunity to provide feedback on this important topic as it will undoubtedly affect the community that I live in. I am concerned deeply with that there will be a private police force operating in my neighborhood that is not responsive to my community and that I have little say and governance over. While I appreciate your principle around Justice, from numerous real life examples, armed police (public, private and otherwise) have consistently demonstrated an inability to adequately protect members of marginalized communities and have been harmful and even lethal. With such a vast footprint around Baltimore City, I am concerned that there will be many community interactions with the private police force that can end similarly to the killing of Tyrone West by Morgan State Police. On this same point, I would like to see the MOU with BPD that details more regarding the enforcement boundaries of the private police force as I am not clear on the jurisdiction of the Hopkins private police force and how they then would interact with folks in Baltimore community.

As a community member that has been vocal about my opposition to John's Hopkins having a private police force since before 2019, I am concerned that me and others in my community have been systematically ignored, going very much against your Equity principle. Having sat in on many hearings in Annapolis, I have seen first hand the overwhelming opposition to this private police force and every attempt to ram it through by Hopkins Administration.

Given Johns Hopkins connections to many weapons manufacturers and ties to Israeli surveillance technology, I am concerned how these technologies will be used and developed in Baltimore with the private police force. Any institution that aligns itself with companies that profit off of and promote war is not one that I trust to operate a private police force and it is not one that can call itself "progressive" (whatever that means in the context of an armed body).

Comment

"Does this policy help JHPD safely carry out its stated mission?"

This is actually a very interesting question to pose, and I'm glad you included it. I think there is a very similar, but much more important, question that should be asked here:

Does the JHPD keep us safe?

Breaking 'JHPD' into its respective 'Johns Hopkins' and 'Police Department' pieces, it's hard to answer that question in the affirmative.

The very authority of a police force depends on a monopoly of violence (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9262041/>), meaning the very existence of police is a threat to public safety. Indeed, with the backing of Qualified Immunity, the legalization of 'Civil Forfeiture', and myriad other codes, police can and do bring harm upon citizens on a daily basis. All this legally, before we get to the issue of cops further abusing their power, something that is not hard to come by through examination of the history of this city (though if you'd like a recent example, might I recommend Soderberg & Woods' "I Got a Monster"). Why would we ever want to add to the number of people who can and will commit such harms?

Johns Hopkins assures us of accountability, civilian review, etc. But as many of the other feedback submissions you'll surely receive note, JHU does not have a good track record in the realm of addressing any harm that it has caused nor being transparent with the greater Baltimore community. In fact, the very process of establishing the JHPD is an example of this. The so-called Two-Year Pause was interrupted by the hiring of Branville Bard, Jr., and the voices of those who oppose the creation of the JHPD have gone unacknowledged. These are not the types of actions taken by an institution that values the feedback of its surrounding community, nor holds their safety and interests paramount.

It is for these reasons that I wholeheartedly oppose the creation of JHPD.

I absolutely do not want another police force within Baltimore City. Please cease any forward movement on this project.

As a community member, I do NOT want Johns Hopkins to have its own private police force. Hopkins is already a culprit in redlining, gentrifying, and harming local communities through suing low income residents for medical debt, buying available housing, and a police force will only worsen relationships with the community, no matter how hard it tries to do something different.

People have been trying to reform the police for over a hundred years and it has never worked. Reform isn't possible for a system that was built on surveilling escaped slaves and unionbusting.

I can't even submit feedback on the policies because they should not exist in the first place.

This is about the vision, mission, etc. 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.

There's a lot of social media groups organizing against JHU police force, but I welcome them Baltimore City police don't actively police, they respond to crime scenes. I'm looking forward to the implementation of your plans, for the benefit of Baltimore citizens.

Stop trying to secretly start a police force that will disproportionately affect students of color and visiting alumnae

I was a [REDACTED] and I stand with the students against the JHU private police. The response from the students and community has been unequivocal and yet, this school silences these voices and commits to an unwanted, violent agenda. Your staff, students, and alumni request a public written investigation into the threats against Tawanda Jones, a public accounting for the death of Bertonazzi after interactions with police, remove dangerous, white supremacist officers from JHU campus security, divest from drone and weapons programs, call for an immediate end to the genocide in Palestine.

We have little hope that the geriatrics in charge of this institution will choose to do the right thing but still, the leadership should be aware that their institution is in decline because of their failure. If you care about the future of this institution, align with your students, align with your alumni, align with current and former staff, and step into the present moment.

Comment

"As an alumni [REDACTED] I am begging you not to create an armed police force.

An armed police force is not going to make the campus safer; it will simply bring guns onto campus. None of Hopkins's problems are solved by having additional guns on campus. Guns will not support public health, as many of our public health faculty have written about.

Guns will not promote community well-being -- it will only heighten the distrust of Hopkins from the neighboring communities and discourage people who live near Hopkins from participating in the academic community. Guns will not promote academic success. The existing security forces have repeatedly demonstrated racist, sexist, and transphobic behavior. Students should not have to worry about being racially profiled or harassed while on campus, but the presence of guns will only heightened students' fears.

Sincerely,
[REDACTED]

I am strongly opposed to the creation of a private police force for Hopkins. As an alumni I know the area and Baltimore more generally is already over policed and underserved. A private police force will accomplish absolutely nothing and will actively make campus less safe.

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 seeking 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.

This document explicitly mentions the University of Chicago as a model for campus private police, when UCPD continues to employ an officer who has shot two people, one of them a UChicago student. As a resident of Waverly, i often walk past JHU security and wonder what has happened in Charles Village and Waverly that these security aren't enough for Hopkins' needs. Private police are ultimately unaccountable and as such should not exist. Terminate this program immediately.

As a neighbor of Johns Hopkins who lives in the Waverly neighborhood, I object to the document's use of the term neighbors as collaborators in your objectives. The JHU police force has been established *without* the support of the surrounding community. At every turn your neighbors have been clear; we do not want your private police force policing our community. There is nothing but dissent whenever you consult with the community. So naming neighbors as willing collaborators in your document is dishonest and misrepresents us.

I oppose the Johns Hopkins University proposed private police force. I can only imagine the events that could occur after reports of a Johns Hopkins hospital patient dying of a spinal injury in the presence of hospital security personnel in Jan.. 2023. The lack of transparency in reports of this investigation gives more reason to disallow an entire private police force to operate on the Hopkins campuses. One wonders what other incidents have occurred that were not given media attention.

Private police forces have no space on campus. Protect students from over policing.

This whole process JHU has ignored student and community feedback. The lack of transparency and (less than) bare minimum of community coordination proves to me that JHU cannot be trusted with its own armed police force. No one in the community wants this.

First, I am not just faculty, but an alum and a community member. 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.

This process has not been transparent. It appears the one public hearing was dominated by people who were protesting establishing a police force, yet the effort is moving ahead. Meanwhile, we hear in the news about a patient named Bertonazzi who died while in security custody at JHH of a cervical spine injury but have not heard anything from Branville Bard, who claims this police force would have intense oversight and total accountability and transparency, about Bertonazzi's death. Please halt this process of establishing a police force on campus. We have no reason to believe it will make us safer and continue to have reason to believe it will not.

Comment

Nobody wants this police force. I'm not even going to submit thorough critiques because I already did that during the MOU and 21CP didn't synthesize any of it. If y'all genuinely cared about accountability, the University would put its endless amount of money and political influence to changing BPD instead of getting to brag about a rebranded version of the same damn thing. Just abandon this already and leave us alone.

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

THE JHPD SHOULD NOT EXIST. IT IS BEING FORMED ILLEGALLY AND UNDEMOCRATICALLY. YOU SHOULD BE ASHAMED OF YOURSELVES

The community does not want JHPD to happen. The faculty, staff, and students do not want JHPD to happen. There has been so much pushback on this, and Hopkins has done nothing to address any concerns. The "Accountability Board" has no real influence, and at the recent public Accountability Board meeting absolutely no questions were addressed. The entire concept that JHPD will be accountable to anyone but the stakeholders is laughable, and it's pathetic Hopkins expects anyone to think any differently. Hopkins has shown time and time again that they will not accept a hair of accountability, but they plan to barrel forward with JHPD nonetheless.

This is a disgrace and a farce. We will NEVER accept a JHPD. Let me repeat: WE WILL NEVER ACCEPT JHPD.

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.

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.

I started reading this and immediately felt overwhelmed by the volume of content, which exceeds what a non-policy specialist would likely have patience for. I predict you'd be more likely to get well-considered responses from interested parties, myself included, if you'd kindly provide a summary with enough information on which to base an informed opinion. This is otherwise a mountain of reading and, frankly, the invitation to respond comes across as insincere. Thanks.

I read 101-111, 202, 401, 402, 405, 433, 440, 462 and 486. I don't have specifics on each section and thus will summarize my overarching comments in this submission. I think these policy documents reflect a lot of thought and effort on the part of the writers."

4. I wish you the best of luck and leadership. If JHU cannot bring to fruition an effective and fair police force, it may not be possible.

- (1) Why should I trust you that I would provide my real name? I do work as a staff member at JHU at Homewood.
- (2) I do not support having a rich organization (JHU) developing a private army (police) to protect its own interests.
- (3) All this accountability board stuff is moot. Anytime the Board of Trustees decides to do something, such as getting rid of the accountability board, they can do so. Then they will be left with a private army under their own control.
- (4) I do agree that the crime in the region around Hopkins is out of control. However the police force should be under civilian, citizen control, not under the control of an ultimately unaccountable and private Board of Trustees.

Comment

How can you justify an armed police force when no data that arms enhance public safety have been released? While this is all a game of perceptions, data alone will cut the rhetoric.

Establishing an armed police force is contrary to all of JHU's efforts to be part of the greater Baltimore community.

JHU needs a police force before one of the students becomes a victim of crime and the parents and other students complain that JHU is doing nothing to protect them.

The justification of any escalation of police involvement at Johns Hopkins and the surrounding communities is wholly deficient. This is an escalation of force against the community, regardless of whatever protections are put in place to prevent this. "21st Century Best Practices" has led to the murder of countless individuals, over 600 annually, with no trends showing this statistic will decrease. We can realize greater violence at the hands of the state-sponsored police by inviting more officers into our community, or we can address the harm that Hopkins' expansion throughout Baltimore has brought through the use of red-lining. There is no need to perpetuate harm by installing armed guards around the gates of Hopkins, whose sole responsibility will be to protect the *grounds* on which us students walk. As an individual who has experienced intimidation, and had family members who experienced direct violence, by police officers, I have no trust that whatever policies drafted or 'enacted' here will reduce the actual harm done by police. As someone with friends who have experienced violence at the hands of police I have no trust in these policies curbing the violence wrought by police. And this is the crux of the issue--any policy drafted herein will not stop the violence that police departments country-wide have proven themselves capable of year after year. If the goal is to reduce the potential for violence on Hopkins grounds, then nothing short of abandonment of this initiative and direct investment in the existing communities surrounding Hopkins must be done.

"Johns Hopkins Public Safety is a progressive leader in campus safety ... to secure a safe environment ..." Are these the same "progressive leaders" who manage existing Public Safety resources & services???

From my vantage point of 12+ years risk management service at Hopkins, I see security operations continuing to dramatically decline as we emerge from the pandemic and focus on police. The root cause of this decline seems related to security/risk reduction being an expense rather than a revenue stream.

Leadership's focus on police and inability to address persistent security operations failures will not lead to a secure/safe environment.

For starters, we need to train existing security staff and repair electronic safety & security equipment. This would enable reporting to leadership and support risk reduction efforts. Respectfully/optimistically submitted.

And don't get me started on CPTED!!! More flowers and less trash please! [REDACTED]

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 forge 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 to not prevent crime, they respond to it. Calling police creators of safety is a 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 to create JHPD make me ASHAMED to be a JHU alum.

No one asked for a JHPD. This should not happen. It will cause more issues. We know that increased policing does not solve the actual issues. We know productive and real investment in the community and community development is how to resolve issues. Please focus on that and not the creation of a JHPD that no one asked for.

I appreciate the effort and thoughtfulness put into these policies.

Comment

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.

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.

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.

Best of luck with the updated policy draft.

FUCK THE JHPD.
PUT THIS MONEY INTO USEFUL THINGS, LIKE BUILDING UP COMMUNITY, NOT BREAKING IT DOWN.

This is dumb, political, and will likely lead to erosion of physical safety. The police force should not be "progressive". It should focus on safety.

Just don't. I have witnessed years worth of lobbying against JHPD, organized around the abundance of data suggesting that the presence of private police forces on college campuses contributes negatively to on-campus experiences--especially among people of color. It would do well for JHU to question who would be most adversely impacted by the existence of an on-site police force rather than assuming that policies based around "reform"-minded universities could make the prospect palatable to campus-goers largely familiar with the advantages of abolition.

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.

On July 17th, 1992, I was working my family's small business, a hot dog stand, on the corner of [REDACTED]. I was working with my friend who i had recruited during the school year at [REDACTED]. This was her first job.

On that day around lunch time, with about 20 people in line waiting to be served, my friend was approached by 2 males who brandished a weapon, robbed her as she was trying to get my attention. I didn't see the gun or the second male. Long story short, i was shot 3 times, once in the chest, shoulder and one luckily missed. My friend she was shot twice in the back. It was the campus police as well as Baltimore City Police that came to our defense. That continued with the investigation and eventually caught all 4 suspects.

Till then the campus police may have had a few issues to deal with in the past but i'm sure i was the first shooting victim. I just want to tell you that i fully support the upcoming JHPD and will gladly say how important it is to have this presence not only as a safeguard but also that when something does eventually happen, there is someone there to help.

Thank you for this.
[REDACTED]

Each of the policies look fair to me. I hope and pray they are effective in reducing crime.

Do not create a private police force. More policing is not in the best interest of our society at large and is not aligned with the research conducted by your own valued public health experts.

I believe that 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"

Comment

I agree with the policies and feel this is a very important step for the safety of the patients, staff and community surrounding JHH. The policy is understandable and provides a clear understanding of the mission behind the policy.

This plan must be cancelled ASAP. The student body, faculty, and community has repeatedly voiced their opposition to this plan and the creation of this unaccountable private police force will lead to irreparable damage both off- and on-campus. These pathetic claims to 'build trust by engaging our community and partners' fools nobody, as the MOU townhalls made acutely apparent. The GRO, an organization well known for its close ties to the administration, has also opposed the plan numerous times and recently even rejected a seat on the hiring committee following an act that can only be seen as corrupt by Branville Bard to cajole a pro-police minority. Despite President Ron Daniell's lovely speak of 'campus democracy' the creation of this force is both an affront to democratic norms and this private police force itself will only stifle democratic life on campus. Even without an armed force of private police, JHU has repeatedly repressed students attempts to organize both against the JHPD and for a labor union. More significantly, however, just as Branville Bard oversaw and defended police brutality in Massachussets, he will do the same in Baltimore. To cancel this plan means to cancel the future suffering of families, violence, and even death. No amount of "National guidance on best practices and model policie" will change this. Reference to the Morgan State University police force, responsible for the death of Tyrone West makes this brutally clear. We as students, organized against this vile plan and the destruction it will bring, will continue fighting against the creation of this police force until it is fully cancelled. You all can be assured of that.

The JHPD should not exist. Students and the broader community have made it clear repeatedly that they do not support the formation of this department. No amount of "progressive policing policies" can mitigate the threat that formation of this department would pose to students and community members. Cancel the JHPD

I believe given how dangerous Baltimore is, we do need police

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.

I don't support having a private JHU police force. To me, it is unethical for us to pursue a private police force while striving to be responsible, equitable, committed partners with Baltimore City and Baltimore City residents.

Abolish JHPD

I highly suggest that you simply do not create a JHPD. It will save the university a lot of money, and it won't make us any less safe. This is the resounding consensus among JHU students (as evidenced by numerous surveys), and it seems foolish to not respect our overwhelming preference.

Hello and thank you for your transparency. I'm glad to see the below quoted expectation included as I often see security personnel inside and outside the hospital asleep at their desk/in their box or staring at their phones. There are many who do not do this, of course! Some of the guards are interactive and present/alert to what is happening around them - usually standing and walking, making eye contact and speaking with all who pass by. I hope that the people hired will be competent, paid well, supervised and trained carefully, and made to feel valued "Members shall be awake, alert, and active at all times while on duty, and shall respond to all calls for service, and render back up to other members, in a safe and timely manner

Comment

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 its best members will ultimately lead to a decrease in effectiveness and a decrease in overall quality. Johns Hopkins resources would be better spent 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. 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 increases 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 are not the only first responders, yet they're the ones in focus here. After so many delays, alterations, and feedback sessions, it is clear that more work needs to be done to meet the community's standards. If 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.

pg. 2 (Cover Memorandum):

b. National guidance on best practices and model policies from criminal justice reform efforts, social science research centers, and civil rights organizations, including: the Leadership Conference on Civil and Human Rights; American Civil Liberties Union (ACLU), including the ACLU of Massachusetts's "Racially Just Policing: Model Policies for Colleges and Universities"; the International Association of Chiefs of Police (IACP); the Police Executive Research Forum (PERF); U.S. Department of Justice Office of Community Oriented Policing Services (COPS Office); The Justice Collaboratory (The JC) at Yale University Law School; and The Center for Innovation in Community Safety (CICS) at Georgetown Law School. Do these choices of national guidance include any with a focus on immigrant communities? Would CASA's national legal team know? Or would a legislative advocacy group know - Latino caucus?

c. National and local higher education institutions that are based in comparable environments and make policies publicly available, including: Carnegie Mellon University; Morgan State University; Towson University; University of Chicago; University of Cincinnati; University of Maryland, Baltimore County; University of Pennsylvania; and Yale University. environments comparable in what ways? re: immigrant composition we may be similar to Cincinnati. Chicago & Pennsylvania are very different to my knowledge - longstanding presence of immigrants communities within their cities. Not sure about Pittsburgh.

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.

This police force is useless, there is no need for it. Please stop this non sense. You know we don't need it. What is the actual reason for this task force? Think about how your interests are shaped by politics and investments

Were any LGBTQ+ organizations/agencies consulted in the drafting of this policy? It has some significant issues. It is also obvious that BPD Policy 720, Interactions with LGBTQ+ Individuals, was not used in the drafting of JHPD Policy #107.

Prohibiting an individual to question or protest a person's right to be in a bathroom if suspected of being the wrong sex for that bathroom prevents, say, women from protecting themselves from voyeurism or sexual assault from men who can gain free entry by putting on women's clothes. This protects LGBTQ+ individuals from accountability by elevating their interests above all others. This is dangerous due to the "self-identifying" nature of this group. If all that is required to be protected from personal accountability is to call oneself LGBTQ, then anyone can shield themselves from accountability by claiming asylum within that group. These policies, including policing speech, serve to embolden bullies who would silence their opponents. Why not ban all "mean" speech? All name-calling or insults?

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.

Comment

Who can I talk to about updating the "Care of the Patient in Custody" policy <https://hpo.johnshopkins.edu/doc/fetch.cfm/X8bvqLhR>

I thought these updated policies would include that after discussions I've had with risk management and public safety this past year, but I do not see any updates. Specifically, there are discrepancies with the Maryland Directive "Hospital and Medical Center Transports (<https://itcd.dpscs.state.md.us/PIA/ShowFile?fileID=4553>) and the JHU policy above.

Examples include,

- The Maryland directive notes that "The transport officer shall ensure hospital security staff receives a copy of the "Medical Transport Order (Appendix A) and returns the original to the shift commander or designee." I do not see that mentioned in the JHU policy, which may help with communication/transitions between the prison/jail and the hospital

- The MD directive says Leg irons and handcuffs are the custodial restraining devices used to restrain an inmate to a bed or wheelchair unless the attending physician requests other devices that do not interfere with the inmate's care...The escort officer shall ensure inmates are restrained by securing one arm and one leg opposite from the secured arm cuffed to the bed or wheelchair. The hopkins policy's wording makes it seem like they have to be restrained to the bed the entire time, when they can also be restrained to a wheelchair.

- All inmates shall be secured to the hospital bed or wheelchair at all times unless the inmate is a) being escorted to the bathroom..Request a bed pan or portable urinal; if not provided, escort to the restroom. The hopkins policy says use of a bedpan is required, when that is not in line with the MD directive and not in the best interest of patient care. (Puts patients at risk of constipation, ileus, hyperkalemia, bowel obstruction, UTI's, etc)

Thank you,
[REDACTED]

[REDACTED]

please mail me a letters

donald j. trump supporters

obama supporters

childsupport

thank you

I love you

**NOTE: The above comment was submitted verbatim a total of 18 times. For readability and brevity purposes, it has been included only once.*

The 1st and 2nd tranches of draft policies, once combined, show that up to 93 policies are still missing as of January 29, 2024.

Nowhere is the incomplete status of the draft policies acknowledged on the Public Safety website.

Please let us know when the remaining policies will be posted and allow for another 60-day comment period.

The Baltimore community has overwhelmingly spoken out against the creation of a private police force at Hopkins.

It would endanger everyone and there has already been one person killed by Hopkins security guards. Listen to students, faculty members, and residents and do not move forward with this private police force.

Hard to believe JHPD's commitment to "Transparency" when in the process of it's creation they have made all efforts to obscure their process and to move out of the public view because they KNOW that the public is opposed. The Public Information Officer cannot be trusted with communicating with the community with our best interest in mind, because they are accountable only to JHPD, and not to the people they're supposed to serve.

Pretty extensive: outlines how, when, where, to file complaints with provided links. Great tool for the public

I've been misgendered, called "it" while seeking ER services, and had John's Hopkins cops hassle me while at the outpatient building for simply sitting in my wheelchair & waiting for my ride (was accused of "loitering" by a man with his hand in a gun. How in earth does this make us feel safer? I specifically friend, via JH customer services, to express a grievance about your security staff in the ER. Was told no one from ER security would meet with me, as protocol required, and there was nothing I could do.

Comment

Hello,

How will you enforce the rules differently to ensure your private police force doesn't cause any of the same mental or physical damage that the BPD or any numerous police departments on and off campus cause? You point out de-escalation techniques, but don't acknowledge that constant police presence often times escalates incidents, and leads to violence. How will your cops be so different than the rest? Many members of the community are against this police department as a whole because there's so much history of police violence; why do we need another department when we already have BPD? Put your energy into listening to what your community actually wants rather than making your own private military, with overkill weapons, and maybe come up with a JHU study on how theoretically your police department would stray away from the pattern of violence that every other department follows. Not that you probably could, but actually try to convince us that this is a good idea vs ignoring comments and pushing ahead like people haven't been saying, "no jhupd" for years. Very uncool, very impolite.

Thaaaanks.

I will begin this, and all other feedback I give with the following:

I have not read each and every policy that you have posted. I simply don't have the time to do that alongside keeping up with my work. I have simply selected a handful of them, found them all to be egregious, and am criticizing them as they stand. I am sure that if I read the rest, I would find them similarly lacking. I will primarily be using your prompt "Is this policy consistent with the values and needs of the community?"

I fundamentally do not believe that this does enough to protect students, because the possibility of deadly force invites it. I could point to the myriad cases of university police departments wounding and even killing students and community members, in places such as the University of Cincinnati and Georgia Tech. I could talk about how many of the uses of force described here, such as chokeholds, can cause far more damage and carries far more risk than people know. I could talk about how, when people are having a mental health crisis, police officers are not given enough training to be able to de-escalate and understand what is happening when compared to the Behavioral Health Crisis Support team. "Unless no other option is available" is not good enough for the split second decisions police officers have to make. It will invariably lead to force being used in situations where it is not warranted. It will inevitably cause someone to be hurt when they did not have to be. Any use of deadly force whatsoever should be entirely prohibited.

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.

Due to the accusations against jhu campus security regarding countless racist remarks and actions, it's clear that the setting up of a private police force would be a danger to the minority students of the jhu community, as well as the minority citizens of the surrounding area. When these types of behaviors go unchecked for even campus security, it creates a world of issues and safety concerns for students in that environment.

As an alum and resident of [REDACTED], I am strongly opposed to any police presence affiliated with the Johns Hopkins family of organizations. How can we the community trust any employees of the Johns Hopkins network to exercise appropriate use of force when we have only recently found out that 63-year-old mental health emergency patient Paul Bertonazzi was murdered by two Johns Hopkins security guards after being driven to Johns Hopkins Hospital in January after experiencing a mental health episode? Not only that, but his injuries are disturbingly reminiscent of the ones caused by the Baltimore Police officers who murdered Freddie Gray in 2015. Further, we are only just learning that JHH has been covering this death up for the past 10 months! Truly despicable. In what world would we consent to you deploying armed police officers if you can't even keep your security guards from murdering mentally unhealthy elders?

I think it's been pretty clearly established that armed police officers have not prevented tragedy in this country. They serve to ease the minds of some rich parents who are scared to send their children to school in Baltimore. They put lives in danger. JHU has been so incredibly bullish when it comes to the JHUpd and especially arming them. The overwhelming community feedback is we don't want it, we think it will create a fearful and hostile environment for students and not deter the most prevalent kinds of crime we see around campus like carjackings and theft. We have no faith in these "feedback" efforts because we have not seen our input integrated. If you must have a private police force, which is dangerous and any issues from them will smear Hopkins' name, at least please do not arm them, especially not with guns!

Comment

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.

As a faculty member – and as a near-lifelong Baltimore City resident and JHU alum – 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.

What the fuck? 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 install fear in both Hopkins students and the surrounding community.

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.

ACAB

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. I feel that the university would make a much better investment in community safety by funneling all funds dedicated to policing into the community instead.

I consider all feedback I provide on policies to be a form of harm-reduction. For policy 409: Field interviews, Investigative Stops and Pat-Downs: I find the emphasis on Marijuana allowable quantities to be disturbing. Multiple national jurisdictions have shown that decriminalizing Marijuana use and possession, no matter the quantity, has led to a decrease in hostile police interactions and decreased the disproportionate impact on marginalized communities. I suggest removing this section entirely and forbidding any police involvement based on suspicion of Marijuana possession.

Additionally, I am disturbed by the provided rubric for interacting with the public. I dislike the reliance on the phrase "reasonable person" in guiding police behavior (for example: "A contact is voluntary if a reasonable person in the person's position would feel free to leave and/or decline any of the officer's requests at any point"). We must acknowledge that in the regular performance of their duties, police officers may come into contact with many people who are not "reasonable," may be in an altered state or may be mentally ill. Communication needs to be explicit rather than implied. Additionally, the JHU community is full of people who come from different cultures and backgrounds, or from countries where police encounters are substantially different from those in the US.

In a related area, I find the rubric for behavior evaluation, especially the "Potential Element for Reasonable Suspicion" to be quite problematic. Many of the examples in this section also apply to those who are developmentally delayed, Autistic, or suffering from mental illness, and I feel that this is a prime example of guideline language that potentiates unfair policing and disproportionate harm against marginalized communities.

How could the JHPD possibly manage threats with the potential for violence in the community when it's THEMSELVES who are entering our neighborhoods with weapons and making us feel unsafe. Police departments across the country murder people of color regularly and their presence in our community is NOT WELCOME and will be the biggest threat to the safety and wellbeing of me and my neighbors. JHPD is simply unable to objectively assess the threat that they pose to the community because they don't listen to us, and will not care about us when they're in our streets. (submitted twice)

Comment

I gave relatively extensive feedback to the first set of policies. I will not do so here. I just want it to be known how genuinely harmful this entire project has the serious possibility to be. I will likely be gone from Hopkins and Baltimore in 4-5 years, like most of the current students. I will not have to deal with the ramifications of this decision. Nor, likely, will many of you reading this. But the communities surrounding the patrol zones absolutely will. Their children will. Their words should have far more weight than ours. Neighbourhood organizations have had overwhelmingly negative responses to this decision, and I am inclined to try and listen to what they are telling us. I implore you to reconsider this process. Or even if you will not reconsider the project as a whole, disarming the JHPD and further restricting where they have jurisdiction in accordance with the wishes of the wider communities seems nothing but reasonable. And if you will not think of them, please think of the students who will call this place home for a part of their lives. This will not make them safer. It will only serve to hurt the most marginalized amongst us, who already have a difficult time within the structures of higher education. I know this plea will likely fall upon deaf ears. This process too far along and too far gone. But I did need to make my distaste at this whole process known, even if for nothing but posterity.

It's great that the JHPD aims to provide care and support to victims but there is ABSOLUTELY NO REASON why an armed officer will help improve a victim's emotional recovery. If JH cares about victims in the community they should invest in a trained team who deals with victims from a human perspective, instead of imposing punitivism and more violence into their recovery process. REAL support for victims looks like prevention, multidisciplinary support and real commitment to justice, it's NOT an armed police officer with unequal power, and accountable to a violent institution.

All for Private Police in these areas.

you talk about problem solving for the communities that hosts john hopkins campuses and engaging with them in good ways but don't address how you will actually combat racism and classism with the people who are being hired and that is instilled in your campus. plus your talking about better relations but you are actively gentrifying the communities with your police force that your saying you'll do better by. you aren't addressing that though so how would u create not superficial good relationships with the few communities members you can while simultaneously not doing enough and actively bringing harm to people in the lower classes with lower money.

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

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 Baltimore City 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. Those are my routes in, but, I know others take different routes as they come from 83.. I just wondered if there would be increased presence on the commuting routes.

Many thanks, [REDACTED]

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.

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.

I live only a few blocks from JHU campus. Walking outside my home to be greeted by a baton and pistol, shielded by a badge and the authority of Johns Hopkins University, is a dystopian vision that my community will fight against until we win.

There have been protests and organized opposition for years. The people of Baltimore and Johns Hopkins have made it abundantly clear that we do not want this police force to exist. It's time for the administration to turn around before they incur personal responsibility for even more injustice and tragedy in this city.

Comment

JHPD support is requested to control traffic exiting the faculty/staff garage on E. Jefferson Street, turning onto N. Caroline Street, between the hours of 3:30 - 5:00 PM. Dunbar students are crossing Caroline St. after school ~3:30 PM, there is heavy traffic coming from the Outpatient center, and cars are often illegally parked on Caroline at this time, all making it hazardous for faculty/staff to exit the garage. There is a police observation tower at this intersection, but police assistance is needed on the ground. Thanks for considering this issue. -

Blah

To the point, procedures were clear and made sense with regards to the various types of evidence, incriminating or impeachment evidence (better for defendant)

You all should be ashamed of yourselves for going ahead with policing at JHU. We will be less safe as students and in the community.

"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.

**NOTE: The above comment was submitted with minor variations a total of 105 times. For readability and brevity purposes, it has been included only once.*