

Protecting What Matters

The State of Indiana For All The People

An Assessment of Indiana's Law Enforcement Curriculum and Training,
the State's Law Enforcement Training Board, and State Law Enforcement Agencies'
Policies and Practices

FINAL REPORT

September 15, 2021



 HILLARD HEINTZE

A Jensen Hughes Company

September 15, 2021

Ms. Rebecca McCuaig
Education and Workforce Director
Office of Governor Eric J. Holcomb
State of Indiana, Statehouse Room 206
200 West Washington Street
Indianapolis, Indiana 46204

Dear Ms. McCuaig:

We have completed our final report detailing the results of our review of the training standards, curriculum, policies and practices of the Law Enforcement Training Board, the Indiana Law Enforcement Academy, the Indiana State Police, the State Excise Police, Indiana Conservation Officers, Capitol Police Services and the Gaming Police.

We believe that if the State of Indiana implements the recommendations that we provide in this report, it can begin to build trust between police and the communities they serve and achieve its goal of demonstrating legitimacy and transparency.

We are happy to discuss our findings and recommendations in further detail. Thank you for entrusting us with this critical engagement.

Sincerely,
Hillard Heintze, A Jensen Hughes Company



Robert L. Davis
Practice Lead and Senior Vice President
Law Enforcement Consulting



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Introduction

Strategic Context

Amid the growing national spotlight on the relationship between law enforcement institutions and the communities they serve, Governor Eric Holcomb issued a directive on August 18, 2020 to improve equity and inclusion across Indiana's law enforcement agencies. In his address on the same day, Governor Holcomb described his goals and objectives:

- + A mandate that every frontline state officer use a body-worn camera by spring 2021
- + A third-party review of the Indiana Law Enforcement Academy's (ILEA) curriculum and training to confirm best practices and modernize the training efforts, particularly regarding use of force, de-escalation and implicit bias
- + The addition of more civilian representation to the Indiana Law Enforcement Training Board (LETB)
- + The hiring of officers who better reflect the racial makeup of the communities they serve¹

To help achieve these goals, the State of Indiana sought a top-down review of the composition of the LETB; the ILEA's curriculum and training; the practices and policies related to recruitment, hiring and promotions; and the patterns and practices surrounding core tasks conducted by the Indiana State Police (ISP), the Indiana State Excise Police (ISEP), the Indiana Department of Natural Resources (IDNR) Conservation Officers and the Gaming Police.

Assignment

In November 2020, the State of Indiana engaged Hillard Heintze to assess the ILEA's curriculum, training, policies and procedures, and help establish a strategic roadmap to ensure the ILEA follows best practices and has comprehensive policies and procedures.

Specifically, the State of Indiana asked us to:

- + Review ILEA documents pertaining to instructional systems design efforts and associated lesson plans for key law enforcement training programs, including implicit bias, community policing and engagement, cultural awareness, use of lethal and non-lethal force, foot and vehicle pursuits, de-escalation techniques, duty to intervene, arrests, search and seizure, and warrants.
- + Focus on the training courses' preparation using the ILEA's instructional systems design process.

¹ https://www.in.gov/gov/files/EJH_Equity_and_Opportunity_Remarks.pdf



- + Review of the ILEA's protocols for key performance indicators and measurements of success, the quality of the training facilities, and the culture of the organizational units responsible for designing and implementing the training.
- + Review the composition of the LETB and its policies and training requirements.

Additionally, the State requested Hillard Heintze evaluate the recruitment, hiring and promotion practices and policies of its State's law enforcement agencies. The State also requested Hillard Heintze identify patterns and practices related to core tasks performed by the ISP, the ISEP, Indiana Conservation Officers and the Gaming Police specifically in the areas of use of force investigations, accountability and transparency, data collection, and critical incident interactions.

On February 2, 2021, the State added an addendum for Hillard Heintze to review the Indiana Capitol Police Service's (CPS) policies and practices, organizational structure and management, key training curriculum and accountability mechanisms.

Actions Taken

Over the course of this engagement, the Hillard Heintze assessment team:

- + Reviewed training materials, policies, procedures, reports, documents and data provided by the ILEA, ISP, ISEP, Indiana Gaming Police, IDNR and CPS.
- + Engaged in over 100 interviews with staff from the ILEA, ISP, ISEP, Gaming Police, IDNR, LETB and the LETB-certified satellite academies, as well as local agency stakeholders, CPS members and Indiana Department of Administration officials.
- + Participated in briefings with key staff to discuss observations, recommendations and next steps.
- + Reviewed key training and curriculum and procedures and policies provided by ILEA to its constituency.
- + Identified patterns and practices related to the ISP, ISEP, IDNR Conservation Officers, the Indiana Gaming Police, and the CPS and made recommendations based on evaluation of policies and procedures and further analysis, if required.

+ SIX PRINCIPLES UNDERLYING OUR ASSESSMENT

We performed our review based on six strategic principles:

1. Independent and objective assessments
2. Consideration of multiple perspectives and viewpoints
3. Focus on collaboration and partnership
4. Information-driven and decision-making mindset
5. A structured and highly disciplined approach
6. Clear and open communication



- + Conducted site visits at the ILEA and the Indiana University Police Academy, an LETB-certified satellite academy.
- + Provided subject-matter expertise and consulted regarding topics arising from our review and evaluation.

Interviews

We interviewed key stakeholders, the involved agencies' command staff and sworn members, LETB members and representatives of the LETB-certified satellite academies. We also met with leadership, instructors and personnel from ILEA and the satellite police academy at Indiana University. Maintaining our interviewees' confidentiality was of utmost importance during this process. Throughout our report, all interviewees' viewpoints and statements are anonymous.

A Special Note on the Governor's Task Force on Law Enforcement Training

On October 31, 2019, the Governor's Task Force on Law Enforcement Training concluded its study with a report on Indiana law enforcement officer training.² The task force reviewed the history of law enforcement training in Indiana, officer training, the communities they serve and the governments to which they report. The task force also reviewed research to identify the best and most efficient means to train officers and to meet training needs and expectations. In summary, the task force published the following major findings.

- + Scenario-based training should be the preferred method of training recruits, and changes must be made to the current processes to do so.
- + Training must be consistent, high quality and standardized.
- + It is beneficial to engage with institutions of higher learning to offer LETB-certified curriculum.
- + Civilian experts are best equipped to teach some subjects.
- + Regular job-task analyses identify subjects to teach to meet current needs.
- + A thorough review of current curriculum is needed to identify what is being taught and tested.
- + Technology must be leveraged to enhance training.
- + A long-term, phased, fair and reasonable strategy that includes the satellite academies is needed to meet training needs.

² Governor's Task Force on Law Enforcement Training Report, October 31, 2019



The report recommended facility and technology enhancements at the ILEA Plainfield facility to meet the current and future law enforcement training needs. As part of our review, we examined the task force's report and determined it is consistent with many of the observations and recommendations we make in this report.

The Hillard Heintze Assessment Team

Hillard Heintze, a Jensen Hughes company, is one of the leading law enforcement and public safety consulting firms in the United States and the world. Since 2004, we have helped drive critical advancements in public safety at the international, federal, state and local levels that are changing how police departments view and execute their missions and collaborate with communities to keep residents safe and officers fulfilled and secure in their careers. In addition to guiding dozens of agencies, our team has helped foster the critical advancements in policing called for in the "Final Report of the President's Task Force on 21st Century Policing." We also served as the U.S. Department of Justice's sole service provider for the Community Oriented Policing Services (COPS) Office Collaborative Reform Initiative for Technical Assistance. As subject matter experts, we developed the seminal U.S. Department of Justice (DOJ) COPS Office's publication, "Law Enforcement Best Practices – Lessons Learned from the Field," a guide for modern police reforms throughout the U.S. The biographies of the team members who contributed to this engagement are in the **Appendix**.



Key Findings

1. We commend the State of Indiana for taking the opportunity to analyze its law enforcement practices to improve equity and inclusion at all law enforcement agencies across the state.

In this report, we provide recommendations based on our key findings, analysis and observations, as well as our experience leading and advising public safety agencies with comparable challenges. We designed our recommendations to serve as an actionable roadmap for the LETB, the ILEA and the law enforcement agencies to update their curriculums and training processes. We believe if these entities implement the recommendations made in this report, they will better prepare officers to foster relationships between the police and residents that are based on mutual trust, respect and collaboration.

2. The Indiana law enforcement agencies we assessed have high morale and support for their core missions.

Personnel from all agencies stated that they were committed to their respective organization and did not desire to work anywhere else. They stated that they provided constructive criticism as part of their sincere effort to improve the organization.

3. The LETB provides training and establishes standards but is not structured to oversee the law enforcement officer training process as an independent body.

The LETB leverages the ILEA's staff and resources to conduct many of the LETB's core functions regarding training standards, approval of curriculums and issuance of certifications. The LETB does not have the staff needed to perform these important functions as an independent body. The LETB does not have dedicated personnel, aside from those at the academies, to complete collateral or primary academy assignments and duties.

4. The LETB should create written minimum standards for curriculum, lesson plans and testing to ensure all academy training, lesson plans and testing for law enforcement officers across Indiana are consistent and align with the State's goals, while allowing for variances for local laws and ordinances.

Training needs may vary based on city and local government requirements and the needs of the specific police department and community. Each satellite academy follows a framework for training that allows for significant variance in training curriculum, lesson plans and proficiency testing. The training curriculum reviewed by our team were high level and mirrored only the broad requirements for the training. It did not contain training goals and objectives.



The LETB only requires the academies to submit each course's title and the provided hours of instruction per course topic. The LETB does not review or approve the lesson plans. Each training academy establishes its testing independently; it is not standardized to ensure achievement of standardized training objectives and goals. The absence of standardized expanded course outlines and learning objectives creates variations in the course content across the academies and instructors. Developing tests without documented learning goals and training standards creates challenges for validating successful training outcomes.

5. We encourage the Indiana State Police (ISP), Indiana Gaming Commission (IGC) and Indiana State Excise Police (ISEP) to develop processes to leverage enforcement contact data to increase transparency and support by identifying any potential bias-based policing practices.

Although the enforcement data available to the agencies is not as robust or complete as it could be, the agencies have not yet leveraged the available data to identify any potential bias-based policing practices. For many years, law enforcement agencies across the country have invested in systems and processes to provide early warning of officers who may be engaging in bias-based policing. Although there is no requirement to do so, these agencies can request and analyze the data that is currently available.

6. The state law enforcement agencies should improve their communication efforts and focus on public engagement to support the core principles related to providing police services.

Notably, the IGC created a diversity council and implemented creative public outreach efforts to more fully explain its mission, ensure diversity in its ranks and decisions, and to engage with the public more effectively. The other agencies do not have a public focus that embraces transparency and communication about their values, work and outcomes. These agencies' websites should be more interactive and share the agencies' value and the services they provide. Although each agency pushes information out through a public information officer program, traditional media and social media, they do not use these channels to share messages with the public or seek ongoing engagement. It is important that the agencies engage with public and demonstrate their value more effectively.



7. The ISP should develop a strategic plan focused on increasing the recruitment, selection and promotional opportunities for women and people of color.

The ISP's recruitment and retention processes are not driven by a broader strategy with metrics and goals for achievement regarding diversity or the increase of diversity in the organization. Although the ISP has attempted to improve its promotional processes to identify qualified, diverse candidates, officers with diverse backgrounds expressed that they believe the reforms the ISP made to the promotion process are ineffective, as they believe the agency, whether intentionally or otherwise, has much work yet to do to increase the diversity of its management ranks.

8. The ISP would benefit from developing a strategic plan focused on implicit bias, cultural competency and cultural awareness.

The ISP's training focuses solely on cultural awareness; it does not address implicit bias and its influence in the outcomes of interactions between officers and residents. Reducing the influence of implicit bias is particularly important to achieve the ISP's goal of strengthening its relationships between officers and communities of color.

9. The State of Indiana would benefit from ensuring its law enforcement agencies share a single case management platform that provides each agency exclusive protected access to their case data, while allowing for better data management and operational use within individual agencies and in collaboration with the other state agencies, when appropriate.

The state's law enforcement agencies should leverage new software technologies that would allow them to capture more relevant operational data and help them better plan, measure and analyze the outcomes of their work efforts. Whenever possible, the state's law enforcement agencies should share a single case management platform that provides each agency exclusive protected access to their case data, thereby reducing the cost of such systems and making it easier to track and analyze common data across agencies through a single platform.



01 *The Law Enforcement Training Board, Training Academies and Training Programs*

Law Enforcement Training Board

Establishment and Structure

Peace Officers Standards and Training (POST) Commissions rose to prominence in 1967 because of the recommendations in the “Challenge of Crime in a Free Society” report in the President’s Commission on Law Enforcement and the Administration of Justice³ and the subsequent “Task Force Report: The Police.”⁴ A POST Commission’s primary function is to set the standards for hiring, training and certifying law enforcement officers within the state. A POST Commission’s authority to set selection and training standards ensures law enforcement officers meet established statewide minimum standards.

The State of Indiana Legislature created the Law Enforcement Training Board (LETB) in 1969 to address the growing needs of law enforcement agencies and the communities they serve. The International Association of Directors of Law Enforcement Standards and Training (IADLEST) recognizes the LETB as Indiana’s POST Commission. The LETB’s primary mission is to ensure Indiana law enforcement agencies follow the minimum standards for law enforcement training. The LETB has the authority, set forth in §/C 5-2-1-12 and §/C 5-2-1-12.5, to certify sworn law enforcement personnel and to decertify officers for misconduct or failure to meet the established minimum standards. Consistent with the LETB’s primary mission, the establishment of minimum training standards assures residents of the State of Indiana that peace officers meet minimum standards of competency and ethical behavior.

Representation on the Board

POST Commissions, such as the LETB, have a responsibility for establishing and maintaining training standards of law enforcement officers who, in turn, have unique challenges and responsibilities. Having proper representation on the LETB assists it in the performance of its duties in addressing the multiple law enforcement training disciplines and types of agencies and the diverse communities across Indiana.

According to the IADLEST, POST Commissions should have “representation of local and county law enforcement and correctional agencies, with additional representation from state law enforcement and correctional agencies, the courts, and other appropriate agencies or professions.”⁵ Today, the LETB has 15 members with two vacancies. §/C 5.2.1.3 requires the LETB to have representation from local, county and state law enforcement agencies that serve differing population sizes. In

3 <https://www.ojp.gov/sites/g/files/xyckuh241/files/archives/ncjrs/42.pdf>

4 <https://www.ojp.gov/pdffiles1/Digitization/147374NCJRS.pdf>

5 International Association of Directors of Law Enforcement Standards and Training Model Minimum Standards



addition, the LETB must include representation from the courts; the media; medical, educational, business and industry professionals; labor; and a representative for elected officials.

The LETB's required members are fairly consistent with other states; however, because the LETB has the authority to establish the minimum standards for correctional officers,⁶ we recommend considering adding correctional department representation to the board.

POST Commissions across the country vary from less than 10 to more than 20 members. Some states include advisory members from organizations that share an interest in the commission's work, and some have at least one representative from a training academy. Including satellite academy representatives on the LETB would provide additional insight and guidance when developing and institutionalizing LETB training standards.

Consistent with the IADLEST and other state POST Commissions standards, the Governor's Office appoints LETB members on a four-year term in a bipartisan decision. §/C 5.2.1.3 states the Indiana State Police (ISP) superintendent serves as the LETB chairperson, and the deputy director of the Division of Preparedness and Training of the Department of Homeland Security (DHS) serves as the vice chair. However, this is inconsistent with most other POST Commissions, as commission members typically elect the chairperson for a set term. We recommend considering an elected or appointed chairperson and vice chair with term limits to avoid the appearance of conflicts of interests that could give higher priority to a particular agency's training needs or access to facilities. Such a change would also promote equity and facilitate cohesion among the LETB's representatives.

Composition and Inclusiveness

The 21st Century Policing Taskforce provides uniform guidance on law enforcement best practices. The taskforce indicated that training oversight boards, such as the LETB, are integral to facilitating community communication and coordination. The taskforce recommended law enforcement agencies engage community members in the training process and stressed the importance of being transparent with the public about training programs.⁷

The LETB is not diverse in regard to race, gender or ethnicity, and its members do not reflect Indiana's demographics. However, the pool of potential future Board candidates among chiefs of police and judges is more diverse. As a best practice for policing, the more diverse the board's representation, the better it reflects the diverse communities it serves. The more diverse board can provide better training guidance and implement policing improvements across the state.

⁶ Indiana Code §5.2.1.9(w)

⁷ Final Report of the President's Task Force on 21st Century Policing



Operations

The Executive Director of the LETB executes the duties that LETB members assign them and serves as the chief administrative officer of the Indiana Law Enforcement Academy (ILEA). The LETB members select the Executive Director for a four-year contract with the possibility of renewal. The Executive Director establishes ILEA subordinate positions and associated job descriptions, which are subject to LETB approval.⁸ The LETB, with approval from the governor, determines the Executive Director's and ILEA training employees' salaries.

Because the LETB is a criminal justice agency, ILEA training officers have arrest powers and "shall assist the executive director to enforce the rules of the board or the Indiana law enforcement academy."⁹ As structured, the LETB Executive Director and, by extension, the ILEA staff execute the duties and responsibilities that the LETB assigns them.

POST Commissions in several other states, including Florida, Minnesota and North Carolina, have staff independent of those from the police academies who are dedicated to developing training curriculum and standards. Having POST Commission staff who operate separately from training academies creates the needed structure to handle the day-to-day operations, ensure compliance with minimum training standards and administrative procedures, and maintain proper records. For example, the Michigan Commission on Law Enforcement Standards organizational structure is comprised of the following.¹⁰

- + **Executive Direction** – Executive Director and Deputy Executive Director responsible for administration, budget, legislative and commission issues
- + **Career Development** – Staff responsible for the training curriculum, instructional methods, in-service training, firearms testing, evaluation and measurement and specific courses of study, such as emergency vehicle operation (EVO), use of force, mental health, domestic violence and sexual assault
- + **Standards Compliance** – Staff assigned to specific training academies to conduct regular audits for compliance with procedures, standards, testing and administrative requirements
- + **Licensing and Administrative Services** – Staff responsible for conducting data collection and maintaining licensing and training records, instructor certifications, fiscal control, and funding development and tracking
- + **Commission Counsel** – An individual responsible for legal matters

8 Indiana Code §5.2.1.14

9 Indiana Code §5.2.1.17(b)(3)

10 https://www.michigan.gov/mcoles/0,4607,7-229-41609_43283---,00.html



Michigan Commission's staffing structure is similar to many other POST Commissions. In Indiana, the responsibility for standardizing training and standards compliance falls upon ILEA staff, who are already heavily burdened with conducting basic, executive, pre-basic and in-service training. We recommend the LETB change its operational structure. By separating the responsibilities of the LETB from ILEA and ILEA staff, Indiana could ensure a more distinct organizational structure dedicated to performing the day-to-day standardization and compliance operations of the LETB, under the direct control of the executive director.

LETB-Certified Satellite Academies

According to §250 IAC 2-2-2, basic training for officers occurs at the ILEA or an LETB-approved school or academy. The LETB has the authority to approve the operation of independent LETB-certified training centers that local governments, universities or other institutions govern or operate.¹¹ According to our review, these local institutions are frequently more responsive to local or regional needs and assist in providing local options to candidates for their mandated training. Six LETB-certified satellite academies operate around the state:

- + Indiana State Police Academy (ISPA)
- + Indianapolis Metropolitan Police Department Academy (IMPDA)
- + Fort Wayne Police Department Academy (FWPDA)
- + Northwest Indiana Law Enforcement Academy (NILEA)
- + Southwest Indiana Law Enforcement Academy (SWILEA)
- + Indiana University Police Academy (IUPA)

The LETB authorized these academies to conduct basic training for officers employed by the department conducting the training. The SWILEA and the NILEA are authorized to conduct basic training for multiple agencies. The Evansville Police Department operates the SWILEA, which is designated under §IC 5-2-15.2, authorizing it to conduct basic training for any officer if no space is available in the next ILEA basic class. The NILEA operates independently of a law enforcement agency. Under §IC 5-2-19, the NILEA is a criminal justice agency with its own board of directors and is afforded the duties and privileges of a police agency. Similar to the ILEA, the NILEA's bylaws authorize the training board and NILEA executive director to appoint officers for the academy. Therefore, the NILEA has the authority to conduct basic training for any officer as a standalone criminal justice agency. However, NILEA must adhere to the LETB's standards.

During our review, we were unable to identify any documented standards or procedures for certifying a training academy to conduct basic training. We encourage the LETB to develop, document and publish standards and procedures for academies seeking to acquire certification to conduct basic training. In addition, the LETB should consider leveraging the existing academies to provide basic training to officers from other law enforcement agencies in the state as a permanent standard. By

¹¹ Indiana Code §5.2.1.10.



expanding the authority of the academies and creating viable avenues to increase the number of training academies in Indiana, the LETB could address several challenges that the ILEA faces, including the backlog of recruits awaiting basic training and large class sizes.

§/C 5-2-15.13 creates the law enforcement academy fund that the LETB uses. The funds are for the ILEA and approved training schools certified by the LETB that meet or exceed the minimum training standards. However, the other academies do not receive any direct funding from the LETB. Currently, the other academies receive “training credits,” which they can use at ILEA facilities, such as the EVO track and firearms range. The ILEA is funded primarily by the state law enforcement academy fund and supplemented by fees from the parent agencies of recruits, and the ISPA receives state funding. However, the remaining five academies rely almost exclusively on local tax money. Considering the large amount of training conducted at these five academies, the LETB should consider developing state funding structures that benefit all certified training academies proportionally to the number of recruits they train.

The cost of law enforcement training is an expensive undertaking for the state and law enforcement agencies. Many states allow open enrollment, which means individuals who meet qualification standards set by the POST Commission can enter a training academy prior to employment by an agency. Thirty states offer open enrollment option to law enforcement training academies. For example, the Illinois Law Enforcement Training Act allows a certified academy to train and certify civilians as law enforcement officers before they are hired by a law enforcement agency. Similar open enrollment models are in practice in Georgia, Florida, Ohio, New Jersey and North Carolina. By adopting an open enrollment law enforcement training model, individuals can enter a career in law enforcement while personally accepting the cost burdens associated with that training. This is often beneficial to agencies that have immediate staffing needs and struggle to afford the cost of training and paying the salaries of recruits attending training.

Additionally, many states have standards to allow community colleges, universities and technical institutes to conduct basic training at the cost of the individual attending. The IUPA has a similar program, which has been successful for decades. We encourage the LETB to explore expanding the use of an open enrollment model to address challenges related to training costs, funding, academy availability and training resources.

Basic Training Programs

To become certified as a law enforcement officer in Indiana, officers must complete the minimum basic training requirements established under Indiana Code within one year from the date of their appointment to an agency. Indiana basic recruit training has two main tiers, along with a pre-basic training course. Tier II basic training is 320 hours designed for marshals and deputies appointed in a town employing no more than one marshal and two deputies.¹² In addition, gaming agents employed by the Indiana Gaming Commission can only attend the Tier II basic training after successfully

¹² Indiana Code §5.2.1.9(i)



completing the pre-basic course.¹³ Tier I basic training is for full-time and part-time law enforcement officers and consists of a minimum of 480 training hours.

Pre-Basic Recruit Training

Pursuant to §IC 5-2-1-9 (10) (b), a law enforcement officer appointed to a law enforcement department or agency may not “perform any of the duties of a law enforcement officer involving control or direction of a member of the public” unless the officer successfully completes basic training at a board-certified training academy or center within one year from the date of appointment. However, a statutory exception, §IC 5-2-1-9 (10)(e), allows an individual appointed as a law enforcement officer to exercise law enforcement duties within the one-year period provided the person completes a 40-hour, pre-basic training course. The requirements of the 40-hour pre-basic course are set forth in § IC 5-2-1-9 (10) (f).

According to our review, law enforcement agencies that need to assign newly hired officers while waiting for an opening in the ILEA basic training program are the primary focus of the pre-basic program. Additionally, the pre-basic program trains reserve officers.

Prior to 2021, the ILEA’s process for administering the pre-basic course was as follows:

- + The law enforcement agency requested the ILEA’s approval to host a pre-basic course. The agency identified the lead certified instructor for the course and provided the instructor’s Public Safety Identification (PSID) number and the number of students attending the training.
- + The agency would pay a \$50 fee to the ILEA for each student attending the course.
- + The ILEA would email the lead instructor with the course schedule, lesson plans and associated PowerPoint presentations.
- + Upon completion of the course, the agency that delivered the training would issue the certificate of completion.

Many states have a set time by which an officer must attend basic training from the date of hire. Our review did not identify another state that grants police authority to a new officer before they meet all requirements for basic training.

Additionally, many states have auxiliary or reserve officer programs; however, this does not always include police authority. Typically, to exercise police authority, the reserve or auxiliary officer must complete a basic training course or equivalency, as well as continued in-service training while assigned to a senior certified officer. Some states offer modified or reduced-hour training for auxiliary reserve officers, do not grant them full police authority, and restrict their duties to supporting certified law enforcement officers (i.e., traffic control).

¹³ Indiana Code §5.2.1.9(f)



We recommend the LETB conduct a comprehensive review of the need for the pre-basic program in relation to the risks associated with it. The LETB should determine whether the risks of authorizing use of a firearm, having arrest powers, and operating an emergency vehicle with limited training are greater than the benefit to the public of quickly placing a new officer into law enforcement duties. In addition, if the need for the pre-basic program is due to the immediate agency staffing needs experienced by smaller departments, the LETB should consider expanding the availability of training by adopting the open enrollment option, engaging colleges and universities, and granting satellite academies the authority to train basic recruits from any law enforcement agency in the state.

Tracking

It was the responsibility of the agency providing the training to track who it certified through the pre-basic program and when that certification expired. The ILEA only tracked the month the pre-basic course occurred, the agency that hosted the training, the lead instructor for the course and the number of students that attended.

ILEA staff acknowledged the pre-2021 process did not provide the state with any oversight or knowledge as to who was certified through the pre-basic course and when their authority to exercise police powers expired. As a result, the ILEA proposed adjustments to the pre-basic program, which the LETB approved in December 2020. Although the curriculum remained mostly the same, the ILEA updated the lesson plans to better reflect the information in the Tier I basic training course. Additionally, the ILEA adjusted how the course is administered and improved the training records.

With the recent changes to track students through a training and learning management software that tracks training, the ILEA can determine which officers must complete basic training. We recommend the ILEA use this information to prioritize officers for basic recruit training based on when they completed the pre-basic course, as well as for forecasting training needs.

Course Materials

Beginning in February 2021, instructors present the pre-basic materials using online materials through the online portal, ILEA course lectures and PowerPoint presentations.¹⁴ Instructors use the ILEA records for the pre-basic course. To access the pre-basic course materials, the law enforcement agency requesting the course must submit a letter that includes the training dates, location, name and Public Safety Identification (PSID) number of the lead instructor, student roster along with an assigned PSID, and payment for each student attending the course. Once approved, the lead instructor receives an email with access to the online portal with the pre-basic course material. The instructor must complete the course within 60 days from the start date because the course then automatically expires, preventing access.

¹⁴ <https://www.in.gov/dhs/fire-and-building-safety/indiana-public-safety-personnel-portal/>



Once the student successfully completes the course, the lead instructor must send the completed “Certification of Pre-Basic Completion” form to the ILEA, which authorizes certificate issuance. ILEA and law enforcement agencies track certified students within the online portal.

Curriculum

The ILEA administers the pre-basic course curriculum and LETB-certified instructors teach the course throughout the State of Indiana. Mandatory subjects in pre-basic training include education and training “regarding the subjects of arrest, search and seizure, the lawful use of force, interacting with individuals with autism, and the operation of an emergency vehicle.” However, the minimum level of education and required 40 hours of training are not sufficient to address these subjects adequately.

An effective law enforcement officer must have the skills necessary for conflict resolution and de-escalation. The pre-basic training course requirements may not be sufficiently rigorous to provide a law enforcement officer the skills necessary to deliver effective and efficient services. The peaceful resolution of encounters with the public requires knowledge of procedural justice, legitimacy and community perceptions. Forty hours of training is insufficient to address these subjects adequately. Before exercising authority, law enforcement officers must be knowledgeable of contemporary challenges an officer may face, including the protection of First Amendment activity and crowd management. The pre-basic training does not address these topics.

COVID-19 Impact

In early 2020, the ILEA closed due to the COVID-19 pandemic. State leadership anticipated the hardship this would create for officers and their employing departments. To address concerns over staffing and delivery of services, Governor Eric Holcomb issued Executive Order 20-09 Relating to the Continuity of Government Operations.¹⁵ In addition to other state-wide issues, the order extends the time period for pre-basic certified officers to complete the basic training course. The executive order, in part, extends “for an additional year, the ability of an officer to exercise powers before completion of basic training as provided in §/C 5-2-1-9(e)” to achieve full sworn status. As a result of pandemic closures and subsequent class size reductions, the wait time for entry to an ILEA basic recruit class reportedly increased from three to six months to six to nine months.

Minimum Training Standards

Indiana Code clearly authorizes the LETB to establish minimum standards for hiring; basic recruit, in-service, advanced and executive training; certifications; licensing; revocation; and auditing. Based on our assessment, the only documented training standards are the minimum standards conveyed in Indiana Code §/C 5-2-1 Indiana Administrative Code §250 IAC 2.

¹⁵ https://www.in.gov/gov/files/Executive_Order_20-09_Continuity_of_Government_Operations.pdf



According to §/C 5-2-1-9, the LETB is responsible for establishing a minimum standard for courses of study pertaining to basic training and must include the minimum standards for the specific courses outlined below:

- + Cultural diversity awareness, including the ‘U’ nonimmigrant visa created through the federal Victims of Trafficking and Violence Protection Act of 2000
- + A minimum of six hours focused on interacting with individuals with autism, mental illness, addictive disorders, intellectual disabilities and developmental disabilities; missing adults; individuals with Alzheimer’s; and an overview of crisis intervention teams
- + Human and sexual trafficking-related topics outlined in §/C 5-2-1-9(a)(10)

Pursuant to §250 IAC 2-2-2, the LETB must approve the basic academy curriculums. Based on our assessment, satellite training academies provide the ILEA with a training curriculum that states the topics of study, associated training hours for each topic and training hours for the entire basic training. Once the ILEA reviews the curriculum, the submitting academy director presents the proposed curriculum to the LETB for a vote. However, this approval process does not include the academies providing lesson plans for each course of study presented. The ILEA and LETB have the topic of study and associated hours, but they do not know what is actually taught because the instructors do not have to provide the lesson plans for each course.

Each academy develops its own lesson plans, student objectives, course material and testing. This was evident when reviewing the provided lesson plans for use of force, de-escalation, and interacting with individuals with mental illness. Although the topics and content were similar, the academies present the material differently and have differing student objectives and written examinations. We recommend that the LETB increase its representatives’ ability to view course content and to ensure course objectives are standardized and aligned with statutory and LETB-established minimum standards. We stress, however, that the LETB’s reviews should focus on compliance with minimum standards, recognizing that many agencies may choose to exceed the minimum training requirements and/or customize training so it supports their formal policies and procedures. Local agencies must be able to present training to their personnel that complies with the minimum state standards while still allowing for differences in policing approaches to meet local needs. For example, there are some distinctions between how police serving educational institutions may provide policing services to a campus community compared to how a law enforcement agency serves a town, city or county.

A defined curriculum with standardized lesson plans and testing would address an immediate need in Indiana’s law enforcement training. The lesson plan should meet the standards and refer to each measurable performance objective covered during the course. We encourage the LETB to leverage the subject-matter experts at the ILEA, satellite academies and higher institutes of learning, as well as private professionals, when developing the core competencies and associated lesson plans for each topic of study. By establishing these partnerships and developing a curriculum based on evidence,



the LETB incorporates best practices set by the IADLEST¹⁶ and recommendations documented in the 21st Century Policing Task Force report.¹⁷

The LETB should consider using this process to establish a statewide certification exam required for students who attend basic training, regardless of location. Creating standardized lesson plans, course objectives and exams establishes a baseline for training. However, as indicated in §/C 5-2-1(c), the LETB should encourage departments, agencies, training academies and certified instructors to exceed the minimum training standards.

Administering basic academy training requires thoughtful planning to facilitate the acceptable level of training expected for law enforcement officers. Consider the important topics below when administering basic training.

- + Safety of the instructors and students
- + Instructor-to-student ratios
- + Instructional methods
- + Course scheduling
- + Testing requirements and procedures
- + Recordkeeping (e.g., attendance, instructor certification, schedule adjustments, student and instructor evaluations)
- + Conduct
- + Absences from training and makeup protocols

We encourage the LETB to develop documented basic minimum requirements, policies and procedures regarding basic academy training administration. This would create a standardized platform to address rules, responsibilities and administrative processes when conducting a basic training academy course.

Compliance

The State of Indiana does not have a formalized audit process to ensure compliance to training standards. Under §/C 5-2-1-12, the LETB can inspect any law enforcement training school to determine if the training follows its minimum standards. Many states have compliance officers who ensure agencies, departments, training academies and instructors adhere to standards. With the recent authorization of temporary academies to conduct basic training, the ILEA instituted a program in which instructors will visit the academies to ensure compliance. We applaud these steps that the ILEA is taking to ensure compliance. We encourage the LETB to formalize this process into a more permanent process for all basic training.

¹⁶ Why Law Enforcement Needs to Take A Science-Based Approach to Training and Education

¹⁷ Final Report of the President's Task Force on 21st Century Policing



Updates

It is important that the training curricula remain current to address crime trends, societal changes and proven best practices to reflect the requirements of the officer's job. Equally important is the need for continuous improvement and ensuring training meets the needs of the agencies and their officers. Under Indiana Code §/C 5-2-1-12, the LETB can research, develop and update curricula in line with best practices, national standards, and current and emerging training needs.

Recognized standards of instructional systems design – such as the analyze, design, develop, implementation and evaluation (ADDIE) process – can create a framework for the LETB to develop and enhance the training programs. One key component of this process is a job task analysis. The analysis is a formalized process for identifying and collecting information related to performance standards, job knowledge, skills, attitudes and physical characteristics. Based on our preliminary review, Systems Design Group completed most recent job task analysis for entry-level law enforcement officers in the State of Indiana in June 2015.¹⁸

Although the curriculums in the academies are consistent with basic law enforcement training standards, we identified opportunities to better align them with emerging national best practices. According to the 21st Century Policing Task Force's report, POST Commission boards should mandate training for implicit bias, procedural justice and social interaction. Procedural justice is a concept designed to build trust and legitimacy in communities and within departments. Skills training focused on social interaction, including impartial policing, de-escalation and elimination of implicit bias, also provide officers with alternate methods of gaining compliance without the use of force.¹⁹

The LETB should also consider incorporating the Integrating Communications, Assessment and Tactics (ICAT) model into the basic training programs. Developed by the Police Executive Research Foundation (PERF) with input from hundreds of police professionals from across the country, ICAT includes the essential building blocks of critical thinking, crisis intervention, communications, and tactics in an integrated approach to training.²⁰ The ICAT model focuses on training officers on how to respond to high-risk encounters in which the individual is unarmed or armed with a weapon other than a firearm. This program complements the existing training curriculum related to interacting with individuals with mental illness. Two of the satellite academies, IUPA and IMPDA, have incorporated this training into their basic recruit curriculum. We recommend the LETB consider following this model for all basic training and collaborate with the satellite academies and an agency such as PERF to formalize the program in Indiana.

¹⁸ Final Report on the Job Task Analysis Study of Entry Level Law Enforcement Officers in the State of Indiana and the ILEA Basic Course

¹⁹ Final Report of the President's Task Force on 21st Century Policing

²⁰ <https://www.policeforum.org/icat-training-guide>



National Standards and Accreditation

State and local law enforcement agencies must constantly assess and improve their policies, practices and training to ensure transparent, safe and accountable delivery of law enforcement services to their communities. The Presidential Executive Order on Safe Policing for Safe Communities ensures law enforcement agencies continue striving to provide transparent, safe and accountable delivery of services to communities, and such compliance is tied to U.S. Department of Justice (DOJ) funding.²¹ To be eligible to receive DOJ discretionary grant funds for FY2021, local agencies must certify their adherence to two safe policing principles:

- + **Adherence to applicable laws.** The applying agency maintains use-of-force policies that adhere to all applicable federal, state and local laws.
- + **Prohibition of chokeholds.** The applying agency maintains use-of-force policies that prohibit the use of chokeholds, except during situations in which law allows the use of deadly force.

Agencies had to be certified or in the process of certification by January 31, 2021 to be eligible for DOJ discretionary grant funds in that year's funding cycle, and the Indiana Law Enforcement Accreditation Commission certifies the agencies. Multiple law enforcement agencies in Indiana receive DOJ discretionary funds and have done so for several years.

Developing standards can be a significant undertaking; however, nationally recognized agencies provide model training standards and guidance on best practices. We encourage the LETB to engage organizations such as the IADLEST and the Commission of Accreditation for Law Enforcement Agencies (CALEA) to assist in developing standards.

Independent credentialing bodies can accelerate academy and agency reviews and assessments, enhance public confidence in law enforcement practices, and allow for the identification and correction of internal deficiencies before those deficiencies result in injury to the public or to law enforcement officers. We recommend the LETB seek accreditation from the IADLEST and encourage the Indiana training academies to strive towards accreditation from the CALEA or IADLEST.

The ILEA should consider options for no-cost technical assistance to address training needs such as developing instructors, updating curricula, and developing and delivering training. Through the Collaborative Reform Initiative Technical Assistance Center (CRI-TAC), the IADLEST provides tailored, technical assistance to state, local, campus and tribal law enforcement agencies in partnership with the DOJ's Community Oriented Policing Services (COPS) Office.²²

21 The White House, Executive Order on Safe Policing for Safe Communities, Executive Order 13929, June 16, 2020, <https://www.whitehouse.gov/presidential-actions/executive-order-safe-policing-safe-communities/>.

22 <https://www.iadlest.org/our-services/cri-tac>



In-Service Training

As indicated in the 21st Century Policing Taskforce, for training to be effective in a dynamic society, officers must continue training throughout their career. The LETB is responsible for setting the minimum standards for in-service training in addition to Indiana Code requirements. The State of Indiana Legislature mandates the following for in-service training.

- + In-service training must include interacting with individuals with mental illness, addictive disorders, intellectual disabilities, autism, developmental disabilities and Alzheimer's disease.²³
- + In-service training must include human and sexual trafficking and high-risk missing individuals.²⁴
- + The LETB may modify the in-service training subject matter, add subject matters or modify the number of hours if the LETB conducts two public meetings with the proposed modifications.²⁵
 - Once the LETB approves the modifications, the LETB must post the changes on the ILEA website 30 days before the modification occurs.
- + Every officer must complete a minimum of 24 hours of in-service training annually, which must include a minimum of two hours of training for firearms, physical tactics and use of force, and police vehicle operation.²⁶
- + State, county and local law enforcement are required to provide continuing education covering topics ranging from domestic violence, child abuse, victim rights, Sudden Infant Death Syndrome (SIDS), CPR, and first aid according to the following.
 - **State:** §IC 5-2-8-5(e)(1-17)
 - **County:** §IC 5-2-8-1(h)(1-19)
 - **Local:** §IC 5-2-8-2(f)(1-18)

The above minimum standards are on the ILEA website and do not include any additional mandated training by the LETB. Based on our assessment, the departments, agencies and academies do not have standardized curriculums or lesson plans for the mandated in-service topics. Each department, agency or academy develops its own lesson plan to meet the requirements outlined above. This creates inconsistencies across the state regarding the quality of the in-service training. Similar to the basic training program, we encourage the LETB to develop standard curricula and associated lesson plans, with assistance from subject-matter experts, to ensure minimum standards are taught for mandated in-service training topics. However, as previously noted, this should not preclude local agencies from providing training that exceeds the minimum standards or that is tailored to their policies and procedures.

²³ §IC 5-2-1-9(g)

²⁴ §IC 5-2-1-9(g) & §IC 5-2-1-9(a)(10)

²⁵ §IC 5-2-1-9(h)

²⁶ §IC 5-2-1-9(g) & §250 IAC 2-7-1



To align in-service training to emerging best practices, we encourage the LETB to consider adding required topics of study consistent to the recommendations made in the 21st Century Policing Taskforce report and the “National Consensus Policy and Discussion Paper on Use of Force.”²⁷ By adding mandatory training on subjects such as de-escalation, implicit bias, cultural awareness and procedural justice, the LETB would help ensure officers comply with recommended best practices.

As mentioned earlier, once officers complete the in-service training, the agency’s chief administrative officer enters the training into the online system. ILEA staff audit this system and contact any agency that has officers who have not met the minimum required in-service training. The ILEA’s online learning management program is sufficient to track the training and meets the objectives; however, the software does not have many automatic or convenient features. The LETB should consider a more robust program or learning management software that is capable of automating more tasks and alerts to maintain the multiple training programs and records in Indiana.

Indiana Training Academies and State Agency Training Programs

Indiana Law Enforcement Academy

The ILEA is in Plainfield, Indiana and is a criminal justice agency with police powers. The state funds the ILEA through the LETB. It receives additional funding from the recruits’ parent agencies. The first academy class at the ILEA facility was on January 6, 1975. The facility has multiple classrooms, a gymnasium, cafeteria, dorm rooms and a physical tactics room. The ILEA campus has a firing range and an emergency vehicle operations (EVO) track with more than a mile of roadway and a large skill pad. The ILEA is primarily a resident academy where trainees stay in the dorm rooms while attending basic training. They return home during the weekend. The ILEA shares the facility with the ISP Academy program.

As previously stated, the Executive Director of the LETB is the Chief Administrative Officer for the ILEA. The ILEA has 14 instructors who provide training for current and newly hired officers. The training staff is comprised mainly of retired officers with decades of law enforcement experience. However, we noted a lack of diversity in the race, gender and ethnicity of the training staff. We encourage the ILEA leadership to evaluate and implement employment recruitment and retention strategies to improve diversity. The ILEA also employs guest instructors from various agencies to supplement their training programs, which represents an additional opportunity to diversify those who present training.

The ILEA provides law enforcement training for all tiers of basic, in-service, advanced and executive training. In addition to maintaining and scheduling the multiple training programs, the ILEA shares resources with other academies, agencies and departments throughout Indiana. For example, many academies and departments in Indiana use the EVO track and firing range. The ILEA provides a high volume of training with limited resources, which creates scheduling conflicts that can impact the

²⁷ <https://www.theiacp.org/resources/document/national-consensus-discussion-paper-on-use-of-force-and-consensus-policy>



program's quality. Expanding resources would help reduce the stress on the ILEA facility resources. Additionally, we encourage the ILEA and the LETB leadership to evaluate the curriculum and provide more options for academies and departments, including a curriculum schedule assessment to redistribute the class load for hands-on and practical instruction and to use instructors for these sessions more effectively.

All of the academy classes in the state spend 40 hours at the ILEA EVO track as part of the training and the academies coordinate their basic academy curriculum around track availability. Developing a curriculum that includes more low-speed maneuverability courses would allow the instructors to complete a portion of the EVO training locally and would reduce the time spent at the EVO. Alternatively, the ILEA should consider constructing a second EVO track training facility elsewhere in the state to alleviate the extremely high demand. We also found that the ILEA leadership uses Microsoft Excel spreadsheets to create recruit training schedules. We recommend using a robust scheduling software to help manage resources and training programs effectively.

The ILEA instituted many changes in response to the COVID-19 pandemic and the associated restrictions. During the last year, the ILEA leadership split the last two basic training classes into two classrooms to complete training and maintain social distancing. At the beginning of the COVID-19 pandemic, the instructor used a video feed and moved from each classroom to facilitate training and questions from students. The ILEA leadership later recorded lessons that they streamed through the online portal for remote training. For the most recent class, leadership reduced class sizes to approximately 100 students to comply with COVID-19 restrictions. More than 50 students engaged remotely via video stream at their hiring agencies. In addition, the ILEA leadership uses the online portal to facilitate remote testing. The most recent class used online portal to start their basic academy training remotely from their employers' departments.

With reduced class sizes and intermittent closures during the COVID-19 pandemic, the backlog of officers in need of training has increased. To address this issue, the ILEA requested existing satellite academies, such as NILEA, SWLEA and IUPA, to incorporate their students in their upcoming recruit classes. Additionally, the ILEA developed one-time temporary training academies hosted by local law enforcement agencies throughout the state to conduct basic recruit training. The LETB approved these academies at five law enforcement agencies throughout the state and formalized the arrangements through Memorandums of Agreement.

The temporary academies used the ILEA's prerecorded videos, presentations, lesson plans and exams. To ensure compliance, an LETB-certified master instructor is present during each temporary academy to proctor the basic training instruction. The ILEA also established routine scheduled observations during which a training lieutenant from the ILEA visits the temporary academy to ensure the instructors use the training material the ILEA provided and that they administer it properly. Although the ILEA leadership established the temporary academies to address an immediate need, we encourage the LETB to expand and formalize a more permanent program that can sustain the growing demand for law enforcement training in Indiana.



The ILEA staff tracks the training records and instructor certifications for all Indiana officers. Staff records instructor certificates, basic training and required in-service training in the online portal. Once an officer completes the required training, the agency's chief administrative officer enters the information in the online portal. The ILEA staff completes an annual audit of the online portal entries to ensure officers have completed the required in-service training. If they identify discrepancies, they contact the appropriate agency to address the issue. The satellite academies do not have direct access to the online portal to confirm the validity of an instructors' certificate. Instead, the employing department makes such inquiries. We recommend expanding online portal access or using a separate software management tool to track instructor certification status so the academies and departments can easily confirm the validity of the instructors' certificates.

Indiana State Police Academy

The ISP has its own academy at the ILEA facility. All newly hired officers must attend the ISP Academy (ISPA). Although ISP shares the resources at the ILEA facility, the ISP coordinates training and has its own instructors for the basic academy. Officers complete 1,182 basic training hours in 25 weeks. The LETB approved this training, which exceeds the minimum requirement of 480 hours for basic training. The average class size is approximately 50 to 60 recruits at the start of the basic training, and, on average, six to eight percent drop out during the program.

Officers can take additional ISPA basic training courses, as well as additional physical training, firearms, law subjects, EVO and control tactics trainings. We encourage the ISPA leadership to continue developing an implicit bias training program and incorporating this training into the basic academy curriculum. They should also consider adding procedural justice and ICAT²⁸ training, as other Indiana academies have done, to further supplement their basic training program.

The ISPA training staff develops the curriculum and associated lesson plans for their basic and in-service training. On occasion, the ISPA uses instructors from other agencies, but they must submit their lesson plans to the ISP training section for review. The ISP training section reviews the basic curriculum annually to make necessary adjustments and updates. The ISP training staff reviews all field training officer (FTO) logs and feedback to assist in curriculum development. The ISP is a member of the State and Provincial Police Academy Directors (SPPADS), so it can facilitate the exchange of ideas, instructional methods and emerging trends regarding training with other members. We consider this a best practice, and we encourage the ISP training section to engage the other academies in Indiana to collaborate and improve law enforcement training.

During the ISPA basic training, the FTOs report to the academy for training. This allows academy trainers to get to know the recruits and to help facilitate their transition to the next phase of training. When the recruits successfully complete the ISPA basic training, they begin the FTO training program. The FTO program has three phases:

²⁸ <https://www.policeforum.org/assets/icattrainingguide.pdf>



- + The recruits complete one week of training on the district they are assigned.
- + The recruits complete a 13-week FTO training program.
- + The recruits perform the duties and responsibilities of an officer under the guidance of a district squad sergeant for 38 weeks.

The FTO and FTO coordinator complete daily observation and other evaluation reports and sends them to the ISP training section for review.

Indiana State Capital Police Training Program

The Indiana State Capitol Police (ISCP) is under the authority of ISP. The ISP Training section coordinates the ISCP training. New hires attend a two-week onboarding training that covers ISP human resource issues, policies and ISCP structure. The recruits then attend the ILEA basic recruit training with non-ISP trainees. Once the officer completes their training at the ILEA, they enter the FTO program.

Once the new officers complete the ILEA training, they enter the ISCP FTO eight-week program. The ISCP FTOs are certified through the ISP Training program. During the eight-week FTO program, the new officers work each shift equally with three different FTOs. The ISCP completes daily logs to track the progression of the new recruits training to ensure they meet all objectives. If the recruit does not satisfactorily complete the FTO program, the ISP training section is contacted. The ISCP follows the ISP policies and procedures to correct training or performance issues identified during the FTO program. Additionally, ISCP officers attend ISP in-service training annually. The ISP training section completes and maintains all training records.

We identified some improvements the ISCP can make in fulfilling its duties and responsibilities. Much of the ISCP officers' responsibilities include maintaining the security of the Indiana Capitol buildings and interacting with the public. Private security personnel, screening locations, physical security measures and technical security supplement building security. The ISCP officers do not receive formalized training on walk-through metal detectors, hand-wand metal detectors or bag searches. Although private security personnel primarily perform these tasks, the ISCP officers should know the process. We recommend officers attend training for screening consistent with Department of Homeland Security (DHS) best practices.²⁹ Additionally, we recommend providing additional training for security personnel on the physical and technical security measures at the Indiana State Capitol Building.

²⁹ <https://www.cisa.gov/sites/default/files/publications/patron-screening-guide-03-16-508.pdf>



Indianapolis Metropolitan Police Department Academy

The Indianapolis Metropolitan Police Department (IMPD) Academy (IMPDA) is in Marion County. The basic recruit academy consists of 932 hours of training over 24 weeks. The size of the basic training class depends on the Department's needs. However, the academy usually has two classes per year, one with approximately 65 to 75 recruits and the other with 35 to 50 recruits per year.

The IMPDA has its own training staff who report to a training commander at the rank of major. The IMPDA staff develop the curriculum and lesson plans for their basic training and in-service training. Like the ISP, the IMPD far exceeds the minimum 480-hours of basic training the LETB requires. The IMPDA staff uses an evidence-based approach to training, which the IADLEST recommends. The basic training provides many additional topics of instruction and the option to increase practical training and psychomotor skills training hours. The IMPDA incorporated ICAT and procedural justice, and it expanded training on cultural awareness and implicit bias. For example, it will instruct the current basic recruit class on interrupting racism. Staff developed this curriculum in partnership with local community foundations and businesses.

In the past, the IMPDA did not fully document, track or retain training records for each officer. The IMPDA Commander and sergeants on staff implemented adjustments to the record management system to properly document all training that involves the creation of a record for each training course an officer completes, and individual files of each officer's training record. Training lesson plans, rosters, instructors and training locations are documented and retained.

The FTO program falls under the IMPD training division. This facilitates additional insight and communication between what is instructed during basic training and how that training translates into the FTO program. Many of the IMPDA officers are FTOs. During the FTO program, the FTOs complete daily logs of tasks performed by recruits and evaluations of the recruits' performance. The IMPD training division reviews these logs to assist with training and to identify training deficiencies or needed curriculum adjustments.

Southwest Indiana Law Enforcement Academy

The Evansville Police Department (EPD) operate the SWILEA in Evansville. The EPD also funds the academy and provides the training staff. The SWILEA does not receive direct funding from the State of Indiana. There are 25 law enforcement agencies in Southern Indiana that send new officers to the SWILEA for training and certification. The SWILEA is tuition free, only accepts new hires that will serve as full-time officers and deputies and does not accept reserve officers for training. Parent agencies provide the SWILEA students with required uniforms and firearms ammunition. Otherwise, these agencies do not contribute to academy funding. The SWILEA uses the EPD's classrooms and training facilities. Community organizations provide low-cost residence options for trainees who live beyond a reasonable commuting distance. The SWILEA typically conducts two academy classes per year. It became an LETB-certified academy in 2005.



A commander, director and lead instructor run the SWILEA. The basic academy class is 16-weeks and includes approximately 550 hours of training. The SWILEA conducts two classes per year, each with a maximum of 20 students. This allows for ample one-on-one instruction and for instructors to get to know each student personally. The SWILEA staff and certified EPD officers serve as instructors. The commander tracks guest instructors' certifications on spreadsheets and ensures data is entered into the ILEA training and learning management software.

In addition, the SWILEA draws on non-sworn civilian subject matter experts to instruct on topics such as domestic violence, mental health, human trafficking and case law. The academy uses the ILEA curriculum as its base for training and then builds onto it. The SWILEA conducts three full weeks of firearms training that includes handguns, shotguns and rifles. Training emphasizes de-escalation, hands-on and scenario-based training, and these classes have a lower instructor-to-trainee ratio. Training includes:

- + Role playing exercises tailored to recent incidents and that are relevant to current officer experiences in law enforcement
- + Force-on-force simulation training to practice decision skills in high-stress situations
- + Training simulators, which use filmed realistic scenarios to practice individuals' response times and decision-making skills

The SWILEA has an agreement with a local private firing range for access and scheduling. The SWILEA schedules its entire academy curriculum through advanced coordination with the ILEA based on availability of the EVO track. The recruit class travels to Plainfield for several days to complete the EVO portion of basic training. The SWILEA uses the ILEA's training credits to compensate for using the EVO track.

The SWILEA conducts a meeting with training staff and the assigned FTOs from the hiring agency to share training profiles of each attendee to reinforce the trainees' basic skills and to ensure the trainers can fully support them. In addition, the SWILEA routinely seeks input from the FTOs on academy training and conducts in-service training for officers of the EPD.

Northwest Indiana Law Enforcement Academy

The NILEA is in Hobart. Leadership operates the academy like a cooperative with approximately 64 law enforcement agency members. Each member agency has a seat on the NILEA Board, which meets at least quarterly. For funding, the NILEA agencies pay a membership fee based on the number of sworn officers it has. In addition, the NILEA receives a fraction of each penny a casino in Lake County generates. The NILEA does not receive direct funding from the State of Indiana. It rents space from the City of Hobart on the top floor of the Hobart Police Department (HPD) building, including offices, three classrooms, a simulator training room, a mat room for physical tactics training, and a lunch and break room. The NILEA also uses a gymnasium near the HPD and shares a firearms range with the HPD. The facility space limits the academy class size to approximately 54 recruits.



An Executive Director with four full-time support staff run the NILEA. The Director is a master-certified instructor who also teaches lesson plan development to the staff and certified instructors from the member agencies. The NILEA training course lasts 15 weeks and includes approximately 600 training hours for the basic academy class, which is limited to 50 students. The NILEA holds two academy classes per year for commuter students. Attendees come from as far east as South Bend and as far south as Lafayette. The NILEA also accepts basic recruit trainees who are not police department employees. They must pay a tuition of \$4,500 and must have a NILEA member agency sponsor. On average, fewer than 10 percent of the NILEA students pay tuition. The NILEA provides firearms ammunition for tuition-paying trainees, and the parent agencies provide ammunition for their recruits.

The NILEA basic academy class mirrors and builds on the ILEA curriculum. The NILEA schedules its academy curriculum around the EVO track availability. Before each academy class, the NILEA submits its curriculum, academy schedule and instruction hours to the ILEA for LETB approval.

The NILEA staff and appropriately certified officers from local police departments serve as instructors. The academy does not have access to the ILEA's training and learning management software, but the director tracks guest instructor certifications manually and coordinates with each parent agency annually to ensure certifications are updated. The NILEA has officer instructors from the Northwest region of Indiana who provide invaluable region-specific knowledge and experience to academy trainees. For example, they discuss gang crimes, which are more common to the region due its proximity to Chicago.

The NILEA offers field days during basic academy during which trainees participate in scenario-based training. They also complete Simunition training,³⁰ practice writing reports and participate in moot court. Each class spends four days in Plainfield to complete EVO training at the ILEA track.

Many of the certified instructors who teach at the NILEA are FTOs at their parent agencies. As such, they informally receive trainees' training profile information from the NILEA staff at the end of the Basic Academy training, which is invaluable for developing the trainees' basic skills after they graduate from the academy and are assigned to an FTO. Additionally, FTOs provide helpful feedback to the NILEA on the training provided. The NILEA offers an annual FTO course for member agencies, which encourages an information exchange on training assessments.

In addition to the basic academy classes, the NILEA provides in-service training courses for law enforcement officers from its member agencies.

³⁰ <https://simunition.com/en/home>



Fort Wayne Police Department Academy

The Fort Wayne Police Department Academy (FWPDA) is at the Fort Wayne Indiana Police Department (FWPD) and serves as the law enforcement academy for FWPD recruits. Although the FWPD basic academy only enrolls its own department recruits, the training center hosts in-service training for many law enforcement agencies in Northeast Indiana. The FWPDA does not receive direct funding from the State of Indiana. The basic academy has been in operation for more than 28 years, and the curriculum and standards meet or exceed the requirements of the LETB. The FWPDA schedules its academy curriculum with the ILEA based on the availability of the EVO track.

The FWPDA includes an office, classroom, multipurpose room, Simulations-scenario room, and an indoor firearms range. It does not have a dormitory. Recruits travel to Plainfield to complete the EVO portion of their training at the ILEA track.

The captain who runs the FWPDA is the Department's only certified master instructor. Five staff members assist the master instructor, and the Department brings in external certified instructors for classes. In addition, non-law enforcement personnel teach some specialty subjects. For example, a representative from the League for the Deaf and Blind instructs a class on interacting with the disability community. Additionally, a subject matter expert instructs a class on mental health.

The 21-week FWPDA basic recruit training program consists of 600 hours of training, and the class size averages 20 to 25 students. The number of classes per year depend on the FWPD's hiring needs. They emphasize psychomotor skills and include instruction on the FWPD agency and local prosecutor-specific policies and procedures. Recruits do not take the oath of office until they graduate from the academy, which is unique to the FWPDA. This encourages the recruits to strive for excellence in their training so they can earn the oath.

The FWPDA requires recruits take scenario-based training during all three phases of their academy curriculum. This positions the recruits to practice and improve skills as they learn them. The FWPDA emphasizes decision-making training. Instructors train recruits on using a handgun, patrol rifle and bean bag shotgun, which they assign after the recruit is sworn in. The FWPDA Captain embraces a holistic approach to managing people and resolving conflict, which includes instruction on procedural justice, implicit bias, diversity and culture, verbal judo, and de-escalation techniques.

The FWPDA monitors training records to ensure instructors are certified. If an instructor fails to maintain their certification, leadership removes them from the FWPDA list of qualified instructors.

The FWPDA instructors participate in a meet-and-greet with the FWPD FTOs to informally share recruit training profiles and facilitate the recruits' ongoing basic skills development after they are deployed into the field as sworn officers working with an assigned FTO.

The FWPDA routinely submits its curriculum and academy details in advance to the ILEA for review and LETB approval. The FWPDA keeps records of officer in-service training that they can quickly and easily retrieve to see the training an officer received in the past 10 years.



Indiana University Police Academy

The Indiana University Police Academy (IUPA) is at the Bloomington, Indiana university campus. It provides basic academy training for eligible and interested students at Indiana University. The average age of the recruits is 22. The IUPA does not have a designated facility. Instead, it uses Indiana University (IU) assets, including classrooms at the Indiana University Kelly School of Business, athletic facilities and other recreational facilities. For two weeks, trainees study EVO and firearms at the ILEA facilities in Plainfield.

IUPA basic academy provides trainees with 634 hours of instruction. IUPA submits its curriculum and academy information to the LETB for approval. Class size ranges from 41 to 60 trainees. The IUPA falls under the direction of the Indiana University Police Department (IUPD). The academy has two full-time staff members who receive training support from IU faculty, the IUPA Alumni Network, and a cadre of certified instructors from IUPD and external agencies. Additionally, community partners provide instruction, including the local prosecutor's office.

The IUPA monitors instructor certifications to ensure they have valid certification. The IUPA staff can directly access the ILEA's online portal for this information. In addition to the basic academy, the IUPA provides in-service training for police officers on topics such as FTO training.

The IUPA curriculum emphasizes scientific and evidence-based policing. Course topics include fair and impartial policing, procedural justice, de-escalation, and mental health first aid. The IUPA staff also incorporates scenario-based training and the Integrating Communications, Assessment, and Tactics (ICAT) model into basic training. This enhances critical decision making when officers confront unarmed individuals or those armed with a weapon that is not a firearm. The IUPD implicit bias training is based on information presented by Dr. Kathy Obear of the Center for Transformation and Change.

The IUPA staff uses a lesson plan development system and standardized tests. Trainees and staff use the IU training system dashboard. The IUPA reviews the curriculum, schedule and strategies annually to identify deficiencies and make improvements. The IUPA has dedicated staff research curriculum content and emerging best practices. The IUPA uses its learning management system to train and track training completion. The IUPDA restricted in-person learning during COVID-19 lockdowns, and staff used the IUPA system to continue basic training. The IUPA training and learning management software has more advanced features than that used by the ILEA.

Indiana Gaming Commission Training Program

The Indiana Gaming Commission (IGC) training program is comprised of three phases: agency-specific training, followed by the ILEA's basic recruit academy, and finally, in-field training with an FTO. First, new hires complete a two-week training program that involves 40-hours of agency-specific gaming enforcement training. During the first week, IGC subject matter experts conduct this training on subjects such as audits, occupational licensing and gaming regulations. Instructors prerecord some of this instruction and make it available to recruits via the online law enforcement training



program, PoliceOne. During the second week, new hires attend the Indiana pre-basic law enforcement officer course, which all gaming agents must complete prior to entering the Tier-II basic training program. The class size of the IGC new officer hires ranges from eight to 20 recruits.

Following the two-week agency-specific training, the new officer attends the ILEA basic academy class in Plainfield. The first IGC recruit class attended the ILEA training in 2006, and they have attended every year since. New hires who are prior law enforcement officers with current certification do not need to attend. Some of the basic academy training is not directly relevant to the IGC recruits' future jobs, but it is required to have state law enforcement officer certification. For example, the IGC officers work in plain clothes. They do not operate emergency vehicles or enforce traffic laws. Additionally, they have a regulatory component to their mission. As part of the basic academy, recruits receive one week of scenario-based training, as well as training in implicit bias, de-escalation and procedural justice.

Immediately after completing the basic academy, the recruits enter a highly structured FTO program. They are assigned to work in a casino under the direction of a field supervisor, often with three FTOs on different shifts. They rotate assignments to all three shifts. The IGC initially set up the FTO program using the San Jose model, which includes daily observation guides. New hires can work as full IGC officers only after successfully completing the FTO program.

The IGC training coordinator directs the in-service training and works closely with the regional training coordinators in state's four regions. The regional training coordinators are regional IGC investigators who hold the training coordinator responsibility as a collateral duty. Each regional training coordinator keeps hard copy records of the in-service training for the personnel in their region, and each officer's training file transfers to any subsequent region to which they might be reassigned. The IGC training coordinator tracks and maintains the IGC instructors' certification records ensure they are up to date. They also coordinate recertifications when needed.

Indiana Department of Natural Resources – Conservation Officer Training Program

A Sergeant with the Indiana Department of Natural Resources (DNR) manages the IDNR training program. The program begins with a four-week IDNR recruit academy with a highly structured instruction format and a focus on IDNR specific laws, regulations, policies, practices and procedures. The instructors also go over how to handle civilian aggression. Average class size is 10 recruits. IDNR recruits do not attend the ILEA 40-hour pre-basic training course.

Upon completing the four-week IDNR academy, recruits attend the ILEA basic academy in Plainfield. They then attend nine to 10 weeks of training on IDNR enforcement essentials. The courses include Fish and Wildlife Law, Boating Law, Timber Laws, Waterfowl Enforcement, Trapping Laws, Ginseng Root Investigations, Basic Investigation Skills, and Public Speaking. Public-speaking training is imperative for IDNR students, as the IDNR emphasizes environmental stewardship and public education.



Recruits then attend a 90-shift FTO program at the IDNR district field offices. Initially, IDNR leadership based the FTO program on the San Jose model, but they have since fine-tuned it to meet their specific needs. After completing the FTO program, recruits can fully serve as IDNR officers.

The IDNR-specific training uses IDNR subject matter experts from the field who are experienced in conducting investigations in their subject area (e.g., timber industry, Ginseng). The IDNR training program maintains lesson plans. Instructors provide regular in-service training for all IDNR personnel. This training includes standard law enforcement subjects and IDNR-specific training, such as the all-terrain vehicle (ATV) operator course and the boat crewman course. IDNR training program staff enter training data into the ILEA's online system.

Indiana State Excise Police Training Program

The Indiana State Excise Police (ISEP) enforces the Alcohol & Tobacco Commission. A training coordinator lieutenant organizes the training for the ISEP. The ISEP holds an eight-week recruit school for new hires that focuses on character building, ISEP policies, responsibilities and duties of an ISEP officer, and applicable laws. The recruits also complete the LETB approved pre-basic program during this time. After completing training, the recruits enter the ILEA basic academy in Plainfield. If there is no class available, the recruits partner with a certified ISEP officer until they can attend the training.

After successfully completing the ILEA basic training, the recruits enter a probationary period and begin training with their assigned ISEP FTOs. The FTO program lasts three months and consists of three phases. The recruits must successfully complete each phase must before moving on to the next. To complete the phase, the new officers must meet all training objectives, have acceptable ratings on their daily observation reports and pass a written exam with a score of 100 percent. The FTOs complete daily observation reports to document the recruits' performances, the tasks they complete and the training the FTOs conducted. An assigned Field Training Manager evaluates the new recruits' performances and completes a weekly report. They submit the reports weekly to the ISEP training coordinator to review before submitting to the Superintendent. If a recruit fails to meet the requirements in any phase, the training coordinator can decide to extend training for up to two weeks with approval.

The training coordinator maintains the training curriculums for the ISEP. The ISEP uses a proprietary public safety data management software to track officer training. ISEP staff conducts in-service training, and they employ other agencies' instructors when needed. The ISEP in-service training meets and exceeds the LETB-required training. Because the LETB does not provide a standardized in-service curriculum or lesson plan, the ISEP develops its own curriculum. However, ISEP instructors develop regional training curriculums, such as firearms and physical tactics, which has caused inconsistencies in the training being offered. Once a recruit completes all training, the ISEP exports a report from its database and sends it to the ILEA to enter in the online ILEA portal.



Recommendations

| Rec. # | Recommendation |
|----------------------------------|--|
| LETB Structure | |
| 1.1 | Establish an operational function within the LETB that includes an executive director with full-time dedicated staff to oversee the engagement with the academies. This function's responsibilities should include establishing consistent standards and compliance requirements, accrediting curriculum, sharing resources, researching best practices, managing training and curriculum for legal updates, planning and funding. |
| 1.2 | Ensure each academy has representation on the LETB to allow for shared insight and awareness and to foster adherence to shared goals, standards and policies. Engage the academy representatives to provide input on emerging issues at the local level. |
| 1.3 | Consider establishing an elected or appointed chairperson with defined term limits to run and manage the LETB to allow for diversity in leadership and perspectives and to ensure equitable decisions are made regarding resources, facilities and training goals. |
| 1.4 | Evaluate the value of appointing civilian representatives from the community to the LETB to gain insight and perspective regarding training outcomes and implementation at the community level. |
| LETB Training Development | |
| 1.5 | Develop working groups of subject-matter experts based on topic area to conduct, review and enhance training and to prioritize training topics with high liability risks (e.g., use of force, pursuits, arrest and crowd control, protest activity). |
| 1.6 | Establish formal written minimum curriculum standards for all tiers of basic training that include the minimum training hours for each topic of study. |
| 1.7 | Promulgate student objectives for each topic of study and the associated lesson plan. |
| 1.8 | Expand the current statute regarding academy training, training standards and curricula for cultural awareness, human trafficking and mental illness to include de-escalation, procedural justice and the duty to intervene to align with emerging best practices. |
| 1.9 | Consider options for technical assistance to address training needs, such as training instructors, updating curricula, and developing and delivering training through the CRI-TAC or the IADLEST, which provides tailored, technical assistance partnership with the DOJ's COPS Office. |



| | |
|---|--|
| 1.10 | Explore developing a shared online learning management system that has robust features and is accessible to all academies in Indiana. Identify gaps and issues encountered by the other academies and review whether the current ILEA system can be so there is a single system to manage statewide training and maintain the training program records in a single and accessible location. |
| LETB Oversight of Academies | |
| 1.11 | Establish formal documented and published procedures and standards explaining the requirements to become a certified training academy that is authorized to provide in-service and basic training. |
| 1.12 | Provide formal standards and measurable learning objectives for scenario-based training. Require academy leadership to incorporate scenario-based training opportunities in each phase of the basic academy training. |
| 1.13 | Consider adjusting the requirements for successful completion of the pre-basic training program so that newly hired officers and reserve officers can only engage in full law enforcement activities when under the supervision of a Tier 1-certified law enforcement officer. |
| 1.14 | Develop a plan to phase out pre-basic training as a mechanism to place new hires in law enforcement activities. Require officers to complete an academy training program before engaging in law enforcement activities. Consider continuing pre-basic training only for new reserve officers. Require established reserve officers to continue in-agency on-the-job training programs under a Tier 1-certified law enforcement officer for a specified period. |
| 1.15 | Allow all LETB certified academies to train newly hired recruits regardless of their parent department. |
| 1.16 | Evaluate whether to provide direct state funding for all LETB-certified academies. |
| LETB Management of Law Enforcement Officer Certification | |
| 1.17 | Establish a state-wide standardized written examination for all tiers of basic training that recruits must successfully complete as part of the certification process. |
| 1.18 | Develop a documented state-wide testing requirement for all psychomotor skills (e.g., firearms, defensive tactics, EVO, physical fitness) to ensure the recruits meet a consistent minimum standard before certification. |
| 1.19 | Audit basic training regularly to help ensure academy leadership is enforcing the minimum standards. Auditors should review training records, ensure properly certified LETB instructors teach the courses, ensure the academies adhere to the minimum standards for student/instructor ratios, and observe classes on site periodically to ensure the academy meets the LETB-established minimum course objectives and testing. |



1.20

Consider establishing a state-wide learning management system to deliver training materials, track student performance, identify training deficiencies, easily inform departments of updated standards, automate emails and distribute real-time reporting. This has financial considerations.

1.21

Develop the minimum standards, measurable course objectives, lesson plans and associated testing for all mandatory in-service training.



02 Curriculum Review

Use of Force

Because the use of force, ranging from verbal commands to deadly force, is one of the most controversial aspects of policing, it is critical that basic academies incorporate into their training the technical and decision-making skills necessary for officers to use force properly. Three sources influence law enforcement officers' decisions to use force: policy, training and decision-making. When recruits receive clear guidance during training and practice decision-making skills with exposure to scenario-based training, they are better prepared to make use-of force decisions. It is a best practice in training to use a multidisciplinary approach to enhance recruits' understanding of how use-of-force options are interrelated. Such an approach should incorporate:

- + The applicable law
- + De-escalation
- + The risks of positional asphyxiation
- + Physical tactics
- + Firearms training

The ILEA and satellite academies incorporate use of force decision-making into scenario-based, role player and practicum exercises, as well as defensive tactics and firearms training. However, during our review, we noted variances in the number of hours recruits participate in scenario-based training based on which academy they attended. In general, the satellite academies provide more scenario-based training than the ILEA.

The ILEA and satellite academies vary on how they use scenario-based training in their curriculums. For example, the ILEA emphasizes a scenario-based exercise at the conclusion of the training, whereas the FWPA incorporates scenario-based training to reinforce course instruction and to practice decision-making under pressure during all three phases of training.

Sanctity of Life

The International Association of Chiefs of Police (IACP) recommends, "It should be the foremost policy of all law enforcement agencies to value and preserve human life."³¹ To address this, basic academies must emphasize the preservation of life throughout their use of force training curriculums.

³¹ *National Consensus Policy and Discussion Paper on Use of Force*. International Association of Chiefs of Police, 2017, revised July 2020.



The ILEA's ethics and ethical decision-making courses emphasize the importance of preserving life, and the preservation of life is a centerpiece the satellite academies' use of force training. For example, the Critical Decision-Making Model³² in the Integrating Communications, Assessment, and Tactics (ICAT) de-escalation training for IUPA and the IMPD Academy recruits emphasizes the sanctity of life in use-of-force decisions. In the Critical Decision-Making Model, ethics, values and proportionality are the basis for all use-of-force decisions. Many progressive law enforcement agencies have enshrined valuing and preserving human life in their written missions and values statements.

Legal Framework

The ILEA "Criminal Law and Procedure – Use of Force" course and similar satellite academy courses of instruction explain the legal framework for the use of force. The courses highlight that courts have set a clear standard for determining reasonableness regarding use of force. The ILEA's and the satellite academies' criminal law presentations and the courses on physical tactics, among other courses, explain the ruling in *Graham v. Connor*.³³

Imagery

The ILEA "Criminal Law and Procedure – Use of Force" presentation prominently displays an image of a Glock semi-automatic handgun on 60 of its 64 slides. Although the course clearly identifies the levels of force (e.g., police presence, verbal commands, empty hands, non-impact weapons, impact weapons, deadly force), because nearly every slide only depicts an instrument of deadly force, the course inadvertently contradicts the content and its messaging with its graphics. With all academy courses, curriculum developers must take great care when selecting graphics and images.

+ GRAHAM V. CONNOR

In this case, the Supreme Court held that courts must judge the "reasonableness" of a particular use of force from the perspective of a reasonable officer on the scene, rather than the 20/20 vision of hindsight.

The Supreme Court outlined a non-exhaustive list of factors for determining when an officer's use of force is objectively reasonable:

- + The severity of the crime at issue,
- + Whether the suspect poses an immediate threat to the safety of the officers or other, and
- + Whether the suspect is actively resisting arrest or attempting to evade arrest by flight.

32 *Guiding Principles on Use of Force*. Police Executive Research Forum, Washington, D.C., March 2016.

<https://www.policeforum.org/assets/30%20guiding%20principles.pdf>
33 *Graham v. Connor*, 490 U.S. 386, Supreme Court, 15 May 1989.



Physical and Defensive Tactics

All the assessed academies train recruits on psychomotor skills, defensive tactics and control techniques. The trainings emphasize appropriately de-escalating situations through the implementation of a lower-level use of force and defensive tactics.

Although all the academies provide firearms training, we noted differences in the quality of firearms ranges and the amount and type of firearms training. For example, the FWPA uses its own state-of-the-art indoor firearms range, while another uses an outdoor range that has limited capacity. Most of the academies only certify cadets for handgun use, but others also certify cadets with duty rifles or long guns. At least one academy, the FWPA, certifies its cadets for the use of a less-than-lethal impact weapon.

Continuing Education

Although recruits must successfully complete a firearms qualification course before becoming certified as a police officer, they are not required by law or the LETB to re-qualify for the duration of their careers. Indiana Code mandates officers complete two hours of annual firearms training, but it does not define what the training should include. Because the Indiana Code does not provide guidelines for the annual training, law enforcement agencies' approaches to annual training vary. Some of these variations include classroom instruction that covers firearm safety and nomenclature through practical and scenario-based training that discusses decision-making. These variations create an inconsistent baseline of knowledge and training experience for officers. We noted similar discrepancies in training approaches for other mandated training such as use of force and physical tactics.

Despite the training mandated by Indiana Code and the LETB's standards, officers could work their entire careers and never complete any practical firearms or physical tactics training beyond what they learned during basic training. National emerging best practices encourage agencies to conduct annual training regarding de-escalation and use-of-force policies, and to develop programs that enhance officers' abilities to make informed decisions when using less-lethal and lethal force.³⁴

Use-of-Force Curriculum

As part of the training record for candidates and to support professional learning, the LETB requires academies record their class curriculum and list each course's title and the number of hours taught per subject. However, this is insufficient. To ensure recruits in each academy classes receive instruction on the same use-of-force topics and materials, the academies should teach the same content. It is not enough simply to offer a course with the same title and number of hours of instruction.

³⁴ National Consensus Policy and Discussion Paper on Use of Force



We did not identify a documented LETB standardized lesson plan for training on use-of-force legal standards, including state law. Similarly, we did not identify any standardized testing for use of force or other standardized tests provided by the LETB or in use at LETB-certified academies. The LETB should standardize the use-of-force training content and testing and include a legal review of the use of force.

Proportionality Standards

Emerging professional practices focus on the proportionality in the use of force by law enforcement officers. Proportionality is the concept that law enforcement officers should use force that is proportional to the threat posed. The use-of-force law courses, including those about legal standards, explain proportional use of force. The courses state that the level of force an officer uses must reflect the totality of the circumstances of the situation, such as the nature and immediacy of threats to officers and others. Depending on the immediacy of the threat and likelihood that the situation will result in injury or death, the officer may need to engage in a greater level of force to counter it.

Similar to what we note above, we did not identify any documented LETB standardized lessons plans for courses that teach proportionality standards, nor any LETB standardized tests in use by LETB's certified academies. The certified instructors who teach proportionality standards in courses at each of the academies use their own lesson plans, rather than lesson plans based on the LETB's requirements. The LETB should establish standard expanded course outlines and learning objectives as the base requirement to guide the lesson plans to ensure the academies teach and train recruits on proportionality standards consistently.

Foot and Vehicle Pursuits

The ILEA and the satellite academies provide training on foot and vehicle pursuits. The foot pursuit instruction explains body language that indicates a suspect may be planning to flee, reasons to initiate a foot pursuit, the procedure when navigating corners fences and walls, the decision-making process involving a pursuit, the execution of a pursuit, and practices for mitigating the inherent dangers of foot pursuits. The ILEA effectively uses case studies to convey the material to recruits. Although the academies teach similar content, not all academies use a standardized lesson plan on foot pursuits. The LETB should establish a standard expanded course outline and learning objectives as the base requirement to guide the foot pursuit lesson plan.

Recruits learn about vehicle pursuits during the basic emergency vehicle operators (EVO) course, which is one of the few standardized lesson plans in use by the academies. Recruits receive a detailed 138-page manual and must use the state's only certified EVO training track, which is located at the ILEA facility in Plainfield.



The course explains that vehicle pursuits are dangerous and that contemporary thinking discourages all pursuits because of the dangers to the public, suspect and officer, as well as threats of litigation. Other topics covered in the course include:

- + Legal authorities set forth by state law and agency policy
- + Environmental factors
- + Vehicular factors
- + Human factors
- + Ethical considerations
- + Supervision considerations
- + The seriousness of the offense and how it impacts decisions to initiate and terminate pursuits

The course states that:

- + No more than two to three police vehicles should be involved in direct pursuit.
- + The pursuit should only involve officers who are not emotionally involved.
- + Officers should not use unmarked vehicle and motorcycles.
- + Officers must use emergency lights and sirens.

The course content reflects best practices and emphasizes the risks involved in vehicle pursuits that law enforcement agencies are increasingly adding to their policies and procedures.

Procedural Justice

Procedural justice focuses on the way law enforcement agencies interact with the public, and how those interactions shape the public's views and engagement. It has been one of the most discussed concepts in contemporary law enforcement reform since the Ferguson, Missouri officer-involved shooting of Michael Brown in 2014.

When officers' actions are open, respectful and impartial because the officers feel their agencies and superiors treat them fairly and transparently, the communities they serve are more likely to act in the same manner because such actions foster a shared value in obeying the law.

+ KEY CONCEPT

Procedural Justice

Procedural justice as a theory incorporates four principles specifically geared toward law enforcement and the community:

1. Being fair in processes
2. Being transparent in actions
3. Providing opportunity for voice
4. Being impartial in decision making



Training law enforcement personnel in procedural justice is a best practice. However, during our interviews and review of the ILEA training materials, we did not identify any instruction on procedural justice in the basic academy curriculum. ILEA staff stated they are in the process of incorporating the concept of procedural justice into future academy classes. All the satellite academies include training on procedural justice in their basic academy training, and some provide instruction on procedural justice and implicit bias together.

The ILEA should prioritize incorporating procedural justice training into its curriculum and the LETB should require procedural justice training instruction in all basic academies. The LETB should also ensure all certified instructors have completed training on procedural justice, regardless of their primary area of instruction to help ensure they integrate procedural justice principles into all aspects of the curriculum. This would help ensure recruits are aware of procedural justice from the beginning of their law enforcement careers.

De-Escalation

The push for law enforcement agencies to integrate aspects of conflict resolution and de-escalation into training and policy as it relates to use of force is not a new concept.³⁵ Researchers have determined de-escalation is as an effective way to avoid uses of force and build better community relationships since 2003. Recently, various Department of Justice³⁶ divisions³⁷ and professional organizations,³⁸ such as the Police Executive Research Forum (PERF) and the IACP,³⁹ have promoted and praised de-escalation terminology and tactics. Since 2014, after highly publicized use of force incidents and officer-involved shootings, law enforcement agencies have been increasingly including de-escalation in their training and operational policies.

+ KEY CONCEPT

De-Escalation

“Taking action or communicating verbally or non-verbally during a potential force encounter in an attempt to stabilize the situation and reduce the immediacy of the threat so that more time, options, and resources can be called upon to resolve the situation without the use of force or with a reduction in the force necessary.

“De-escalation may include the use of such techniques as command presence, advisements, warnings, verbal persuasion, and tactical repositioning.”

National Consensus Policy on
Use of Force

35 <https://www.justice.gov/archive/crs/pubs/principlesofgoodpolicingfinal092003.pdf>

36 <https://www.justice.gov/opa/pr/justice-department-applauds-adoption-police-department-wide-tactical-de-escalation-training>

37 https://cops.usdoj.gov/html/dispatch/10-2013/more_de-escalation_tactics_training.asp

38 <https://cops.usdoj.gov/RIC/Publications/cops-p324-pub.pdf>

39 <https://www.theiacp.org/sites/default/files/all/s/StartingwithWhatWorksBrochureWeb.pdf>



In May 2015, the 21st Century Policing Taskforce, which was established to provide guidance on policing best practices, prominently highlighted de-escalation in its final report.⁴⁰ Since the publication of the report, many law enforcement training academies and agencies have embraced de-escalation as a standard for training and added it to their use of force policies.

The CALEA Law Enforcement Standards Manual, Chapter 4.1.1 explains the importance of de-escalation in use of force and recommends law enforcement agencies train their officers on de-escalation and include in their policies language about de-escalation, particularly as it relates to use of force.⁴¹ The National Consensus Policy on Use of Force recommends law enforcement agencies include de-escalation in all training for use of force.

Courses

The ILEA curriculum includes a course on verbal de-escalation and the related courses “An Introduction to Mental Disorders” and “Dealing with Alcoholism and Alzheimer’s-Related Dementia.” An experienced law enforcement officer teaches the ILEA’s basic cadet training de-escalation course and relates his first-hand experiences using de-confliction to mitigate the need to use force. A mental health expert teaches the ILEA courses on mental disorders and working with those with alcoholism and Alzheimer’s-related dementia. The ILEA’s use of non-law enforcement personnel to teach these specialized topics is a best practice.

The satellite academies offer similar courses of instruction relating to de-escalation taught by both experienced officers and civilian subject-matter experts. The satellite academies incorporate de-escalation practices and techniques into their instructions about defensive tactics and use of force, as well as in the practicum.

Practical and Scenario-Based Training

The ILEA de-escalation training provides insufficient practical application for cadets to become proficient in using de-escalation techniques. The ILEA includes limited practicum exercises in its basic cadet curriculum, primarily at the end of the academy, and it is not clear to what extent, if at all, the exercises challenge the cadets with de-confliction scenarios or specifically evaluate the cadets on the use of de-confliction techniques. We recommend the ILEA build a robust series of scenario-based hands-on exercises and provide them throughout each phase of the academy. The exercises should directly expose the cadets to all concepts they learned in the classroom and include deconfliction techniques. The ILEA should evaluate cadets’ performance. Many of those we interviewed at the ILEA said the training facilities are inadequate for scenario-based training. IADLEST recommends that training academies provide adequate facilities for practical exercises with special needs.

40 https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf

41 CALEA Standards Chapter 4 § 4.1.1 Use of Reasonable Force, Commentary



Duty to Intervene

As a result of emerging national discussion, more law enforcement agencies are beginning to include the duty to intervene in their use of force policies and training. Many law enforcement agencies have included in their code of conduct policies requirements for officers to act immediately to stop dangerous situations to the public and immediately report when another officer violates a policy. Agencies are now specifically including the duty to intervene in their use of force policies and training.

The National Consensus Policy on Use of Force states, “An officer has a duty to intervene to prevent or stop the use of excessive force by another officer when it is safe and reasonable to do so.” The National Consensus Policy also recognizes that law enforcement agencies should provide training “on all approved force options and techniques permitted by agency policy, along with regular refresher training that includes a review of the policy and hands on practical training.” By including duty to intervene training in basic recruit curriculum, law enforcement agencies can promote ethical policing, accountability, and the safety of officers and the community.

Our review of the ILEA’s and satellite academies’ curriculum and the use-of-force training materials did not reveal any content specifically related to the duty to intervene. The ILEA includes some of the principles of the duty to intervene in the courses “Ethics in Law Enforcement” and “Introduction to Chivalry.” The ethics course covers the importance of holding yourself and others accountable and standing up for what is right. It also examines five modern ethical issues, such as “Reasonable or Unnecessary Force.” Similarly, the “Introduction to Chivalry” course discusses standing up for the vulnerable and abused, and confronting wrongdoing.

The ILEA, like many law enforcement academies, delivers its training in blocks with sessions dedicated to a single topic. Block training is cost-effective and the easiest way to schedule training; however, it is not an effective method for long-term skill retention.⁴² One study showed significant degradation of officers’ skills only 16 weeks after leaving the training academy.

The ILEA should integrate its use-of-force training into a multidisciplinary approach that connects the use-of-force training components with other training topics so recruits may see how they may use the approaches for a specific situation. A multidisciplinary approach would help improve recruits’ understanding of their use-of-force options, such as de-escalation and duty to intervene, and how they are interrelated. The satellite academies implement a better multidisciplinary approach with enhanced scenario-based training and subsequent assessments for optimal motor-skill learning and

+ KEY CONCEPT

Duty to Intervene

Supervisors and other officers are responsible for addressing officer and civilian safety by intervening in another officer’s actions if the officer violates policy or an individual’s constitutional rights, or places themselves, another individual or the law enforcement agency in danger.

⁴² O’Neill J, O’Neill DA, Weed K, Hartman ME, Spence W, Lewinski WJ. *Police Academy Training, Performance and Learning*. 2018.



retention for all aspects of use of force. We recommend all the academies incorporate a multidisciplinary approach in their use-of-force training that is reinforced through scenario-based training throughout all phases of the academy class.

Searches

Academy trainees must understand the authority, responsibility and potential liability officers have regarding searches in addition to the specific processes, skills and techniques to conduct the searches (e.g., safeguarding evidence, chain of custody, officer safety). Trainees must gain a clear understanding of the protections provided by the Constitution, statutes and case law against unreasonable search and seizures.

The International Association of Directors of Law Enforcement Standards (IADLEST) guidance (33.2.2 Curriculum) requires academies seeking accreditation to ensure academy curriculum is based on a valid job-task analysis and updated at least every five years. The ILEA curriculum includes multiple courses that provide instruction regarding searches:

- + Criminal Law and Procedures – Intro to Search and Seizure
- + Criminal Law and Procedures – Searches with Warrants
- + Criminal Law and Procedures – Warrantless Searches
- + Building Searches
- + Room Clearing

The Law and Procedures courses provide detailed instruction about the basic principles of search and seizure law, warrant and warrantless searches and seizures, motor vehicles searches, and searches of people. The courses provide detailed instruction on the following topics:

- + Techniques to conduct a search safely
- + Securing evidence
- + Building and residence search and entry techniques (e.g., “slicing the pie,” two-person coordinated searches)
- + Identifying potential operational hazards when conducting searches and executing warrants
- + Planning and executing searches and warrants in residences and vehicles

The training courses should include additional emphasis on the importance of conducting after-action assessments after a search. This practice improves officers’ effectiveness and efficiency when they conduct searches, which often involve multiple officers working together.



Scenario-Based Training

Increasingly, law enforcement training programs are incorporating searches into scenario-based training practical exercises during basic cadet training. Core principles of adult education practiced at law enforcement training academies encompass a combination of visual, auditory, and kinetic learning with hands-on exercises involving role playing scenarios and direct involvement of the trainees.

Evaluators observe trainees' actions during these practical exercises and rate their performance based on their choice and use of appropriate search techniques, as well as the legality of the search. Scenario-based exercises may include plain-view searches, consent searches, and exigent circumstances searches that officers typically encounter during vehicle stops or calls for service.

The academy should expose trainees to classroom instruction related to searches and seizures before they complete scenario-based training on those topics. The ILEA provides 16 hours of scenario-based training. We recommend the ILEA expand its scenario-based training to allow trainees to practice the application of the search and warrant lessons they learned in the classroom.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 2.1 | Integrate the ILEA's use-of-force training into a multidisciplinary approach that connects the use-of-force training components across the training for recruits. A multidisciplinary approach would help improve recruits' understanding of their use-of-force options, such as de-escalation and duty to intervene, and how they are interrelated. Such an approach integrates multiple knowledge domains that cover the use of force, such as legal standards, decision making, psychomotor skills and firearms, to enhance the scope and depth of learning. |
| 2.2 | Incorporate the multidisciplinary training approach for use of force that is reinforced through scenario-based training throughout all phases of the academy class in all academy basic training. |
| 2.3 | Expand the ILEA's scenario-based training to allow trainees to practice the application of the search warrant lessons they learned in the classroom. |
| 2.4 | Use standardized, expanded course outlines and learning objectives for training on the use-of-force legal standards, including proportionality standards. Use standardized tests to capture recruit's comprehension of the use-of-force materials. |
| 2.5 | Include training and an emphasis on after-action assessments of search operations as part of the training on conducting searches. |



03 *Implicit Bias*

The impact of bias and discrimination can be evaluated from several societal perspectives, including the selection and hiring of officers, officers' enforcement decisions, and an agency's policies, procedures and practices. Because direct evidence of bias and discrimination is difficult to obtain, law enforcement agencies focus on reducing the influence of unconscious or implicit bias on officers' decisions that affect the agency's internal and external communities.

+ KEY CONCEPT

Implicit Bias

Unconscious thoughts that affect an individual's behavior toward or interactions with others.

Implicit bias is not solely a law enforcement issue. However, because of the potential consequences of an officer's biased decisions, such as deadly force and inappropriate treatment of victims of sexual assault, it is imperative that law enforcement agencies evaluate all their operations for bias, especially in the recruitment and selection of their personnel.

We interviewed line and command-level personnel, including senior executives, from the ISP, IGC, IDNR, ILEA and the Excise Police. We also reviewed the relevant policies and procedures. We determined that although the agencies embrace cultural awareness and diversity, they have yet to commit to educating their members and developing the policies, procedures and training required to address implicit bias in a robust and systematic manner.

As part of its basic recruit curriculum, the ILEA provides cultural awareness and diversity education. This curriculum has been in place for over a decade and includes a discussion of the differences between discrimination and implicit bias. However, this course is only four hours long, which does not provide sufficient time for robust discussion. Additionally, we did not find evidence that the ILEA has integrated implicit bias testing into key practices such as personnel recruitment and selection, scenario-based training, force options training and de-escalation. Testing for implicit bias allows law enforcement agencies to help ensure officers can resolve issues without bias or prejudice.

Like the ILEA, other state law enforcement agencies, including the ISP, IDNR and Excise Police, do not sufficiently educate or train employees on implicit bias and how, if not recognized and addressed, it can negatively impact their service to the public. We asked women and people of color from the noted agencies whether they understood the concepts of bias and implicit bias and whether they believed they have experienced bias or implicit bias in the workplace. Members of the IDNR, Excise Police and the IGC did not believe bias has adversely affected them or any of their colleagues. The IGC developed a Diversity Council that addresses personnel matters in a holistic manner, including discussion of bias and implicit bias, as described further in the Personnel section.



Notably, only members of the ISP reported they have experienced bias or implicit bias in the workplace. These ISP members often prefaced their response with the statement, “I don’t think they know their behavior is offensive because they have never been taught or exposed to other cultures.” The ISP provides its members with cultural awareness education and training taught by command-level personnel, demonstrating its importance to the organization. However, this training does not include a discussion of implicit bias or actions officers could take to reduce the influence of implicit bias when interacting with their colleagues and community members.

We did not find evidence of, nor were we told about, misconduct or complaints alleging bias or related behavior by the ISP. However, some ISP members who are female and people of color shared instances of perceived disparate treatment they received from colleagues, supervisors and ranking members of the organization. These perceptions included disparate treatment in assignments, promotions and training opportunities. They expressed their beliefs that the disparate treatment was not malicious, but rather was influenced by implicit bias. They believe the disparate treatment occurred because the officer or supervisor did not know that someone could interpret their behavior or action as offensive.

ISP leadership has recognized the need for a more robust education and training curriculum that addresses bias and implicit bias in the workplace. The ISP superintendent tasked command-level personnel to review nationally recommended practices to assist in developing training focused on bias and implicit bias. We recommend the ISP support the training by developing a strategic plan that includes a discussion of implicit bias and cultural awareness and competency to address the disparate actions of its internal and external stakeholders.

Recommendations

| Rec. # | Recommendation |
|--------|--|
| 3.1 | Develop an LETB standardized training curriculum on implicit bias, cultural competency and cultural awareness to support training requirements for the academies. |
| 3.2 | Ensure the ISP’s implicit bias training and education scenario-based training requires an officer to make a decision and includes subsequent discussion and education regarding whether the decision was influenced by implicit bias. |
| 3.3 | Develop a strategic plan for the ISP regarding education and training on implicit bias, cultural competency and cultural awareness. Include a goal to increase diversity of members by rank, race and gender. Identify measurable steps that could be taken to help prepare employees to apply for and succeed during promotional testing processes. |
| 3.4 | Mandate all law enforcement training academies provide implicit bias, cultural competency and cultural awareness training consistent with the curriculum developed under Rec. 3.1. |



3.5

Coordinate with the State's Chief Equity, Inclusion and Opportunity Officer to establish an ISP working group or council with duties and responsibilities focused on improving agency diversity. Establish quarterly training on inclusion-related topics.



04 Personnel Practices

We reviewed relevant documents and interviewed members of the State of Indiana law enforcement organizations and found that although personnel practices vary given each agency's size, hiring needs and complexity of duties, as a whole they are consistent with practices used by similar law enforcement agencies throughout the US.

The ISEP, IGC and Indiana Conservation Officers use various methods to recruit applicants, and one of their primary methods is to recruit retired ISP officers. In our interviews, members of each organization expressed satisfaction with their hiring process, working conditions and opportunities for promotion. Given the size of the agencies, promotional opportunities were infrequent as officers seldom left the job other than due to retirement.

Diversity Council

The IGC proactively established a Diversity Council to assist in hiring women and people of color. The Diversity Council, comprised of members from varying divisions of the organization, first met in October 2019 with the full support of the agency director. The Diversity Council created and tasked the Law Enforcement Officer subcommittee to evaluate ways to improve the agency's diversity, including updating pictures on the agency's website to highlight its diverse workforce. Other substantive changes included:

- + Amending the passing score on the physical agility test to a composite score rather than requiring applicant to pass each phase of the test (e.g., pushups, pullups), which disproportionately affects women.
- + Revising the law enforcement officer description to remove gendered words.
- + Revising the hiring metric so that the percentage of specific applicants of color and women hired is equal to or greater than the percentage of those groups who applied.

The Diversity Council was instrumental in establishing virtual job fairs and quarterly training on inclusion related topics. In 2020, these quarterly training topics included unconscious bias, microaggression, gender bias and effective communication.

+ KEY CONCEPT

Personnel Practices

The policies, procedures and protocols an agency uses to attract and hire candidates and retain members who successfully complete the academy. These practices ensure that all members of an organization have equal opportunity to compete for appointment or promotion to supervisory and leadership roles.



We learned the ISP struggles with attracting, retaining and promoting officers of color and women. The ISP struggles despite the Recruiting and Human Resources (HR) Units' focus on attracting and connecting with people of color for potential employment opportunities. Furthermore, a significant number of members of the HR office's recruitment section are people of color.

Nationally, law enforcement agencies are having difficulty attracting applicants, especially people of color. Despite the national climate, the ISP has instituted some processes to encourage people of color and women to apply and support and encourage them as they move through the hiring process. The ISP is currently accepting applications for its next recruit class, and HR noted that people of color and women account for nearly 40 percent of the total applicants.

To attract applicants to apply, HR representatives have begun frequenting local gathering locations, such as restaurants, barber shops and hair salons, in predominantly Black communities to connect with possible recruits and request assistance with recruiting applicants. Officers assigned to divisions on a temporary or as-needed basis assist HR in recruiting applicants. This practice is consistent with best practices in the profession. Frequenting barber shops, beauty salons and restaurants is a novel approach that is subject to more scrutiny, especially in circumstances in which the HR representative is a white man with no established relationship with the individuals they are seeking to approach. Although ISP leaders consider this a progressive move, some Black ISP members consider the tactic to be offensive or patronizing. They believe the ISP would not use the tactic to recruit white applicants or applicants of other demographic groups. Unexplained, this recruitment tactic may be viewed as an indicator of implicit bias. Although we laud the motivation behind this tactic, we recommend the ISP develop a strategic recruiting plan that provides structure and guidance to its recruiting efforts.

The ISP has instituted a practice to assist a successful applicant move from applicant to academy graduate. The ISP's innovative readiness workshop, a process that provides awareness, familiarization and support for a successful applicant experience, is heavily attended by candidates of color and women. The readiness workshop includes proctors or peers, some of whom are women and people of color, who provide support throughout the process. Once recruits reach the academy, however, there are few instructors or counselors who are people of color or female. We recommend the recruiting strategic plan include making peer and other support available to candidates who require assistance to complete the academy successfully. It is a best practice for law enforcement agencies to allow affinity groups to supplement their recruiting efforts and provide peer support to recruits while they are in the academy. However, in interviews and discussions, we were informed that representatives of affinity or employee groups cannot address candidates while they are in the academy. Allowing affinity or employee groups to address candidates while they are in the academy could support trainees who are struggling, whether for personal or professional reasons.

The ISP has instituted practices with the goal of increasing the promotion of women and people of color. The ISP, specifically HR, focuses on the advancement of people of color and women in its reassignment and promotional processes, with specific processes such as Police Rule 5 – Promotion. HR provides candidates with its ISP Promotions Systems Guide, which details the promotions process and supports promotional candidates. In fall 2019, HR provided unsolicited assistance to officers to support a successful promotional experience. This state-wide tour enhanced insight to the



promotional process, and hundreds of officers attended, ranging in rank from officer to lieutenant. The program provided preparation tips for the written test and oral interview from the interviewer's and interviewee's perspective. In addition to this program, training videos and personal assistance are available through HR. We interviewed some ISP members of various racial backgrounds, however, who still perceive that the adopted promotion measures have yet to increase the opportunities for minority candidates to be selected, whether intentionally or otherwise. Obviously, this is a significant concern that the ISP leadership will need to address through increased analysis of the issue, enhanced communication with those who share this perception, and increased efforts to encourage minority candidates to apply and then support them as they prepare for promotional opportunities. We note, however, that the Department has reported an increase in the number of employees with minority backgrounds who have been promoted recently, with a 36-percent increase in the number of Black individuals promoted between 2020 and thus far in 2021, including a Black female sergeant. We note that even those ISP members who raised concerns about the promotional processes advised us that they take great pride in the ISP as an organization and that they enjoy working for the Department.

Recently, the ISP instituted the practice of ensuring at least one woman or person of color is on all promotional interview panels. This practice is too recent to provide data to analyze its impact on the promotion of women or people of color.

Regarding hiring, retention and promotion, the ISP could incorporate innovative policies, procedures and efforts more effectively to increase the diversity of its personnel. White men exceed 80 percent of the total reassignment and promotional statistics for 2018 through 2020. Although that percentage has dropped from 88 percent in 2017 to 81 percent in 2019, two white female captains were included in the 14 reassignments and promotions to captain rank or higher within the same time period.

We recommend the ISP, and specifically HR, increase transparency in its processes so female officers and officers of color have better insight and awareness of the ISP's efforts in place to attract, retain and promote such officers. The ISP should continue to review its internal practices, policies and mission to ensure they focus on recruiting people of color and women. The ISP should review national and recommended practices to create a framework to recruit women and people of color successfully.



Community Engagement to Attract Recruits

When law enforcement agencies have positive relations with the community, it affects not only their ability to accomplish their core missions but also the degree to which the community perceives the agencies to be legitimate and procedurally just. Law enforcement agencies can leverage these positive relations with the community to augment their recruitment and selection processes, particularly to recruit women and people of color.

Indiana Gaming Commission

The IGC serves a community composed primarily of individuals who visit gaming properties for entertainment. We reviewed IGC documents and interviewed IGC personnel. We concluded the IGC is committed to serving its community in a manner that promotes legitimacy and procedural justice.

The IGC publishes educational material on gaming laws and what visitors can expect at an IGC facility. In addition, the IGC prominently displays resources at all gaming facilities for consumers who have a gaming or gambling addiction. The IGC has committed to acting on all complaints it receives about consumers' experiences at a gaming facility, including personal communication with members of the IGC leadership. We interviewed IGC members who stated that because of a positive interaction they had with an IGC professional, they sought employment with the agency.

Indiana Department of Natural Resources

The IDNR serves a community composed of individuals who fish, boat or hunt, primarily for recreation. The Indiana Conservation Officers' (ICOs) efforts to achieve community support and collaborate help the IDNR ensure these individuals engage in recreational activities safely. The IDNR leverages school programs, provides conservation public announcements, and offers hunting, fishing and boating camps to receive input from its community. The IDNR's outreach efforts to a particular community helped the agency resolve a conflict regarding fishing responsibilities. Through this direct communication, the IDNR and the community were able to address the conflict, which involved a lack of understanding rather than a disregard for fishing laws.

The IDNR assigns, commensurate with regular duties, a public information officer (PIO) to every district. The PIO serves as a conduit for receiving information from and providing information to the community. The PIOs community outreach can influence how the IDNR serves its constituents.

Some ICOs we interviewed shared that a positive experience with the IDNR as a child or adult influenced their decision to seek employment with the agency.

+ KEY CONCEPT

Community Engagement

The establishment and building of tangible and collaborative relationships built on mutual trust and respect, common interests, procedural justice, and a sense of shared responsibility.

Law Enforcement Best Practices:
Lessons Learned from the Field 2019



Indiana State Excise Police

The ISEP has a distinct role with power to enforce the laws and rules of the Alcohol & Tobacco Commission, as well as the State of Indiana's laws. The ISEP is not engaged at the traditional community level. ISEP officers reported that their level of community engagement varies in accordance with the direction and posture of the ISEP director. Officers identified variances in their enforcement and community engagement activities based upon the goals of the ISEP director.

Indiana State Police

The ISP has a history of being accessible to the people of Indiana. The ISP accomplishes this through participation in community events and school programs. By far, ISP officers' most common interaction with the community occurs on the side of roads or highways when officers interact with the public. We interviewed members, including women and people of color, who recounted how the command presence and willingness of an officer to engage with them during their previous interactions with officers motivated them to become ISP officers. This reflects yet another critical reason why the implementation of procedural justice is so important. Some of these members spoke of having the same professional interactions with people they encounter now as officers interacting with the public, including women and people of color.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 4.1 | Develop a strategic recruitment plan for each state agency to outline recruiting and diversity goals, as well as required skills. Ensure metrics support the strategic plan. Measure performance at least biannually and adjust tasking as necessary. |
| 4.2 | Develop formal plans for recruitment activities, including outreach through schools, communities and other presentations. Measure the response from such events and track successful outcomes. Modify the plans as needed. |
| 4.3 | Use and formally train recruitment ambassadors to work with communities and the public in recruitment efforts. Use a diverse range of ambassadors to promote outreach and recruitment across all communities in Indiana. |
| 4.4 | Increase the use of social media to expand recruitment efforts and ensure diversity in the images and reporting on the websites. |
| 4.5 | Ensure diversity in the training academies so the trainers reflect the population of the agency, as well as that of the police recruits. |



| | |
|-----|--|
| 4.6 | Establish a promotional process review to assess equity in testing and promotions. Continue the ISP's process for outreach throughout the agency for increasing transparency and support for promotions. Include a measurement and evaluation of the actions in the ongoing review of the outreach's impact in developing qualified diverse candidates. |
| 4.7 | Develop a peer support approach to mentoring newly promoted personnel to help ensure their success as leaders within the organization. |
| 4.8 | Coordinate with the State's Chief Equity, Inclusion and Opportunity Officer to determine the best way to utilize the IGC's Diversity Council to support all state law enforcement agencies to help address concerns of diverse employees and to help ensure a focus on inclusion. Continue to review agency recruitment, inclusion and promotional efforts against best practices and assess for potential bias. |
| 4.9 | Leverage positive relations with the community to increase the recruitment of diverse candidates. |



05 Critical Incident Interactions and Mental Health

The overall goal of crisis intervention is to improve the response and outcomes when law enforcement officers engage with individuals experiencing a mental health crisis. This includes diverting those in crisis from a criminal justice approach to one centered on treatment and support whenever possible.

Across the U.S., public safety agencies are exploring how to improve the law enforcement response to those experiencing a mental health crisis. We do not have consistent or reliable data on law enforcement encounters with those affected by mental illness.⁴³ However, law enforcement officers are likely to encounter individuals affected by mental illness. The National Alliance on Mental Illness (NAMI) identifies that two-in-five people who are incarcerated have a history of mental illness, and nearly one-in-four people who law enforcement officers shot between 2015 and 2020 had a mental health condition.⁴⁴

Law enforcement officers are often the first to respond to individuals experiencing a mental health crisis and although the interaction has the opportunity to have peaceful resolution, many high-profile incidents have demonstrated challenges and the potential for tragic outcomes.

National Perspective

Crisis Intervention Team (CIT) programs are local initiatives designed to improve the way law enforcement and the community respond to people experiencing mental health crises. They incorporate strong partnerships between law enforcement, mental health service providers, and individuals and families affected by mental illness.⁴⁵

The growth of CIT programs was a response to national discussion on how best to assist individuals experiencing mental health crisis. The City of Memphis is credited with beginning the CIT approach in 1988. Since then, different models have emerged across the country, with most focusing on a specialized police response. Officers complete training to learn how to identify those experiencing a mental health crisis and then de-escalate the situation and provide resources and assistance to the person. Officers often partner with on-site or remote mental health professionals who offer consultation and advice.

43 <https://www.theiacp.org/sites/default/files/2018-08/ImprovingPoliceResponseToPersonswithMentalIllnessSymposiumReport.pdf>

44. https://www.nami.org/NAMI/media/NAMI-Media/Infographics/NAMI_CriminalJusticeSystem-v5.pdf

45 <http://www.gocit.org/crisis-intervention-team.html>



According to the IACP, the standard training for officers to become CIT qualified is a 40-hour law enforcement classroom program. By 2018, 2,700 police departments reportedly implemented this training. The program's core elements include mental health signs and symptoms; appropriate medications and their side effects; a tour of local mental health facilities; the use of verbal de-escalation techniques; active listening skills; and improved police tactics using safe restraint techniques to reduce the use of force in these types of incidents. The program is a collaborative initiative between law enforcement officers and mental health experts who provide crisis intervention for individuals affected by mental illness and who focus on diversion and treatment instead of arrest and incarceration.⁴⁶ One of the challenges to ensuring appropriate services to individuals affected by mental illness is creating and sustaining stronger collaboration between law enforcement agencies and stakeholders for mental health services.

Indiana's Legal Framework

The Indiana Legislature established requirements for CIT development and training under *IC 5-2-21.2-1* "Indiana Technical Assistance Center for Crisis Intervention Teams." The LETB established the technical assistance center in conjunction with the Indiana Commission to Combat Drug Abuse and the Division of Mental Health and Addiction. The Legislature tasked the Center to identify grants and other sources to fund local crisis intervention teams and to create and support a statewide CIT advisory committee with representatives from a range of stakeholders. In addition to training and program development, the statute tasks the Center with a range of duties including:

- + Building partnerships and encouraging formal agreements among local law enforcement, mental health providers, individuals and families affected by mental illness and substance addiction disorders, and other community stakeholders to improve prevention and response to mental health and substance addiction disorder crises.
- + Developing and communicating a recommended best practices CIT training curriculum, consistent with recommended standards developed by CIT International.
- + Communicating and disseminating existing standard protocols for law enforcement officers transferring an individual in crisis to medical personnel for treatment under an immediate detention under *IC 12-26-4*.
- + Reporting on the status of crisis intervention teams in Indiana, including an evaluation of outcomes and best practices.

⁴⁶ <https://www.theiacp.org/sites/default/files/201808/ImprovingPoliceResponsetoPersonswithMentalIllnessSymposiumReport.pdf>



The Indiana legislature established the Indiana Technical Assistance Center under § 5-2-21.2-6, which directs the Board to establish free crisis intervention training for law enforcement regarding:

- + Signs and symptoms of a mental health crisis
- + Mental health treatment options in the local community
- + De-escalation and crisis intervention techniques to facilitate interaction and referrals to treatment⁴⁷

The focus on law enforcement training is part of a larger goal of establishing more CITs and resources in Indiana.

Crisis Intervention Teams in Indiana

Traditionally, expert stakeholders, often the local Crisis Intervention Team (CIT) and other mental health stakeholders, support law enforcement training. The Indiana Chapter of NAMI operates the technical assistance center for developing crisis intervention teams (CIT) in Indiana and supports the CIT Indiana website.⁴⁸ The Indiana CIT program is comprehensive and focuses on a stakeholder response to engagement with individuals experiencing mental illness. A successful CIT training program develops first responders' skills and knowledge to support more effective collaborative interventions that reduce harm and increase access to resources within a county. The CIT training for law enforcement, including the 40-hour CIT training, is one component of the overall CIT response.

The Indiana Division of Mental Health and Addiction (DMHA) provides CIT law enforcement training grants for small law enforcement agencies or departments that have trained less than 10 percent of their officers on CIT. However, due to the COVID-19 pandemic, these trainings did not occur last year. Currently, 13 CITs are active in Indiana and training is consistently in demand.

Because of the specific jurisdictional requirements for the state law enforcement agencies we reviewed, many of their roles do not directly translate to fully engaged CIT support and response. For example, the IDNR Conservation Officers and the Gaming Police have limited jurisdictions. The ISP is the primary state agency that engages in crisis incidents, but its statewide jurisdiction makes it difficult for the ISP to involve itself directly in local CIT engagement.

⁴⁷ IC§5-2-21.1-2

⁴⁸ <https://www.cit-indiana.org/>



Law Enforcement Training for Mental Health Crisis Intervention

The ILEA and the ISP offer training that covers some law enforcement response issues that arise when officers engage with individuals with mental illness and teaches the use of verbal de-escalation to minimize the need for using force in crises. The ILEA and the ISP provide minimal training specifically focused on CIT. The documents we reviewed reflect a more generalized approach to training on mental health crisis.

Ideally, the planning and implementation of a training initiative that supports crisis intervention training is a collaborative effort between a law enforcement agency and the stakeholders within the local CIT. The CIT helps guide training decisions, develop materials and identify and prepare trainers. It also ensures a range of voices contribute to the training, including that of mental health practitioners, those with lived experience and family members. Finally, the CIT training helps ensure quality by establishing a process for consistently reviewing and evaluating training and then modifying the curriculum based on the findings.⁴⁹

The NAMI engaged with the LETB and the ISP on the development of CIT programs and training for law enforcement. The LETB was an active partner when the State government passed the technical assistance legislation in July 2015. Since that time, the LETB's engagement on CIT law enforcement training has not been as robust, in part because of the impact of the COVID-19 pandemic on law enforcement training.

Providing consistent and regular training on engaging individuals in mental health crisis or with mental health issues is important. However, delivering effective training is a challenge, particularly for smaller agencies that lack the necessary resources or personnel. The NAMI recently engaged the LETB to build and deliver six one-hour training segments on a range of mental health issues and the interaction with law enforcement. This is a nascent project that could continue CIT-trained officers' engagement and those seeking to refine their knowledge and skills. This training is in an e-learning or distance-based training format, which may also prove useful to smaller agencies.

The ISP determined it was impractical to train all officers on the full 40-hour CIT law enforcement course given the expanse of its jurisdiction and the allocation of its staff. The NAMI engaged with the ISP to develop a six-hour course module to present at the ISP district facilities in partnership with ISP trainers. Although not CIT training, the training called for having both law enforcement and mental health experts to deliver the training. The training focused on a range of issues associated with engaging individuals with mental health, which would help provide officers with de-escalation skills and knowledge about the appropriate outcomes and resources for those suffering from mental health issues. The first two hours of the module focus on verbal de-escalation. The next four hours of the course address de-escalation and police interactions with mental illness, with a CIT emphasis. The pandemic also impacted this project, and it was never fully implemented.

49 <https://bja.ojp.gov/program/pmhc/learning/essential-elements-pmhc-programs/3-specialized-training>



The ILEA website did not identify any off-site 2021 training opportunities for the 40-hour CIT training that certifies officers. The ISP has sent 40 officers to the 40-hour CIT training for law enforcement. Five officers were scheduled to attend in 2019 but did not because it was cancelled and not rescheduled, due to the pandemic.

Mental Health Training

ILEA Training for Police Candidates

The Tier I basic training is for law enforcement officers expected to engage in routine patrol services in Indiana and is discussed more fully earlier in this report. The basic training covers a range of topics and training to help candidates become successful law enforcement officers. The ILEA presents a three-hour course specific to individuals with mental illness, titled “Introduction to Mental Disorders.” In the practical exercises, officers participate in scenarios intended to replicate future incidents and are evaluated and graded depending on how they respond. The ILEA identified that these practical exercises sometimes involve a scenario with individuals suffering from mental health illness. However, we did not receive the scenarios to review.

The “Introduction to Mental Health Disorders” lesson plan includes a presentation by a civilian participant who has a mental health illness to share his experience of interactions with law enforcement, as well as what it is like to live with a mental health illness. A credentialed mental health professional then presents on mental health disorders and closes with a discussion on CIT training and the role of first responders. The presentation materials are comprehensive and include an introduction to the biological nature, diagnosis, treatment and prevalence of major mental disorders, including schizophrenia, depression, bipolar disorder, substance use disorders, antisocial personality disorder, borderline personality disorder, panic attacks, post-traumatic stress disorder, and mental disorders seen primarily in children. However, no materials that we reviewed address the other lesson plan objectives, including criteria for immediate detention or the role of CIT officers.

The ILEA provides an eight-hour training block on verbal de-escalation, which can be an effective response tool when dealing with individuals in mental health crisis. However, the training does not specifically address how to engage individuals with a mental health illness or reference techniques to use for individuals in mental health crisis. Although the eight-hour training module for domestic and sexual violence includes a collaborative agreement with advocacy services to support the training delivery, such an approach does not exist for CITs.

ISP Academy Training

The ISP is the only agency that we assessed that has routine interaction with people in mental health crises, although at a rate less than that of a municipal police agency given the nature of the ISP’s jurisdiction. The ISP provided us several training documents about mental health illness and interactions with officers. Although there is no specific CIT module, multiple training modules, which



total five hours, touch upon key issues associated with police interaction and de-escalation when engaging with individuals who are in mental health crisis or have mental health illness. The modules include a two-hour training on autism, a one-hour training on “excited delirium” and a two-hour training on de-escalation. The ISP communications specialists do not train on CIT response.

The “Mental Illness and Police Use of Force/De-Escalation” training includes specific information on mental health, illness and how people suffering from schizophrenia and other mental health issues perceive or may react to law enforcement commands and engagement. The lesson plan includes the signs and symptoms of mental illness and provides information about local mental health resources.

The training module on autism spectrum disorder defines autism and the importance of law enforcement awareness of the disorder. In February 2021, the ISP revised the lesson plan on excited delirium, with a goal of helping improve responses to incidents involving people with excited delirium.

In-Service Training

Most law enforcement agencies have annual in-service training requirements for training that focus on skills refreshment or newly enacted legal or policy requirements for law enforcement. In Indiana, the LETB establishes the annual training standards and requirements. The law enforcement agencies we assessed follow the ILEA’s training standards. We outline the ISP’s in-service training below.

ILEA-Mandated Training

Under §5 -2-1-9(g), the ILEA must provide 24 hours of annual mandated in-service training that officers must complete to be employed as a law enforcement officer.⁵⁰ Mandated training topics include interacting with individuals with mental illness, addictive disorders, intellectual disabilities, autism, developmental disabilities, and Alzheimer’s disease or related senile dementia. Individuals approved by the secretary of Family and Social Services and the board provide the training. CIT is not a mandated training topic.

The ILEA and the NAMI have worked on a series of six one-hour training modules that address mental health illnesses and other issues associated with law enforcement response. However, they did not finalize these due to the pandemic.

Annual ISP Training

The ISP does not provide CIT training with focus on the holistic interventions or unique factors when engaging with individuals in mentally health crisis as part of its annual in-service training requirements. In 2020, the ISP provided a one-hour online training about law enforcement interactions with people with mental illness as part of its annual in-service training requirements. This

⁵⁰ Gaming officers are excluded from this requirement, but conservation officers are required to comply. (§5-2-1-9(g)(f))



training centers on the types of mental illness an officer may encounter. Other annual in-service training, though not specifically linked to CIT or mental health, supports improved law enforcement response to individuals in mental health crisis and includes training on traditional de-escalation and the use of active listening skills when on traffic stops or when responding to assigned calls. Communications specialists (e.g., dispatchers, call takers) do not have to partake in the annual in-service training unless they are law enforcement personnel.

The ISP developed a draft training module on mental health and law enforcement response, but it has not delivered it to officers. This module has a two-hour focus on verbal de-escalation and a four-hour mental health-focused training that addresses immediate detention and the seizure of firearms possessed by individuals in mental health crisis, which is intended to be delivered in person with a mental health professional and an ISP trainer. The ISP intended this training to be delivered at the ISP district facility locations rather than at the academy, which is a good practice for bringing training to the field. In 2020, the ISP provided only the first two hours of verbal de-escalation training via the online learning portal; it did not provide the four hours focused on CIT-related training. The ISP has not yet made plans to re-engage the training.

Staffing for a Law Enforcement Response Under a CIT Program

CIT is more than training – it is a coordinated, collaborative response designed to improve outcomes for persons in mental health crisis. As part of this response, law enforcement agencies train officers to ensure not only the basic skills for a trained response are in place, but also that officers specifically trained in mental health crisis intervention are available to respond to calls for service. Standard practice includes ensuring enough officers are on each shift to cover the service demand and geographical needs for the area. An emerging practice includes ensuring sufficient staffing of CIT-trained communications specialists, call takers and dispatchers to maintain appropriate focus on and potentially to de-escalate the incident from the initial contact through the field response. CIT trained personnel ensure the correct identification of a person in mental health crisis and that the response is consistent and appropriate to the needs of the person in mental health crisis.⁵¹ The law enforcement agencies we reviewed were not part of any CIT at the local level, so they do not staff to support such programs.

The ISP analyzed its ability to fully staff CIT-trained officers but determined it would take approximately 300 officers to staff and cover its CIT response needs sufficiently. This level of staffing is not feasible and would be difficult to manage given the state-wide jurisdiction of the agency. Those officers that were fully trained on law enforcement's role in the CIT response through the 40-hour program, employ their skills and training as part of their routine duties to recognize the signs of someone in mental health distress and to de-escalate the situation to achieve better outcomes. Although ISP officers are not part of any local CIT programs, the ISP has CIT-trained officers

51 <https://bja.ojp.gov/program/pmhc/learning/essential-elements-pmhc-programs/3-specialized-training>



assigned in jurisdictions throughout Indiana, including Bremen, Lafayette, Ft. Wayne, Putnamville, as well as to the Capitol Police Section.

Recommendations

| Rec. # | Recommendation |
|--------|--|
| 5.1 | Develop a comprehensive training approach for the basic academy curriculum that addresses individuals in mental health crisis. Include awareness of people in mental health crisis; culturally appropriate responses; information from those with lived experience; and exercises addressing response techniques and tactics. Develop this curriculum collaboratively with mental health professionals, who can also assist with the delivery of the training. |
| 5.2 | Reconvene the technical assistance center to develop a statewide perspective and approach to the development of CITs and to support formal, ongoing CIT training for law enforcement officers. Identify needs and offer training assistance, including grants, to support CIT training statewide. |
| 5.3 | Use the technical assistance center to expand in-service training on mental health awareness. |
| 5.4 | Ensure the ISP reviews and implements the six-hour in-service training developed in partnership with NAMI, which includes verbal de-escalation and response to persons in mental health crisis. |
| 5.5 | Ensure the ISP's onboarding and annual training for communications staff, including call takers and dispatch, explains how to engage with individuals in mental health crisis and de-escalation techniques. |
| 5.6 | Develop an annual reporting rubric that provides for updates on training, data on the response to individuals in mental health crisis and the expansion and engagement of CIT programs across Indiana. |
| 5.7 | Consider ensuring ISP personnel have access to and knowledge of local CIT program resources to support appropriate responses and interventions for individuals in mental health crisis. |



06 Body-Worn Cameras

Each of the State of Indiana law enforcement organizations we assessed has considered the use of body-worn cameras (BWCs) and made decisions specific to their unique circumstances. For example, the Indiana Gaming Commission uses video cameras throughout its gaming establishments to gather evidence related to activity on the casino floor. Gaming Commission officers routinely review this footage for investigative and administrative purposes and to review officers' encounters with patrons, especially those that involve the use of force or removal of a patron from the establishment. Gaming Commission officers and supervisors prioritize hiring additional personnel over buying BWCs. This was a common theme among interviewees from other law enforcement agencies who also stated hiring additional personnel is their primary priority. We assessed only the ISP's use of BWCs.

The ISP is poised to provide BWCs to select units pending the allocation of funds, having selected a vendor in late April 2021. ISP Standard Operating Procedure ENF – 010 Law Enforcement Recording Equipment, published October 27, 2016, and LAB Operating Procedure – 008, govern the operation of all ISP recording equipment. Department leaders informed our team that they issued the Body-Worn Camera Testing Policy, published October 21, 2020, to provide additional clarification regarding the use and operation of BWCs. For the testing phase, the ISP has reviewed a multitude of BWC policies from agencies within the State of Indiana, across the country and the IACP's model policy to create a policy consistent with model policies and recommended practices.

The ISP standard operating procedure ENF- 010 Law Enforcement Recording Equipment focuses solely on the mechanical operation of recording devices. The ISP has focused on creating a BWC policy that explains the policy's purpose.⁵² The ISP should consider explaining how BWCs help the organization hold its officers accountable for performing their duties and engaging the public in a manner consistent with its mission and values, as well as how the video helps protect officers from false allegations and provides important information to assist in follow-up investigations. The ISP can reemphasize that it is committed to the principles of procedural justice and legitimacy. The ISP's procedures should support its overarching philosophy on BWCs and capitalize on the opportunity to send a positive and instructive message to State of Indiana residents. The IACP's model BWC policy includes:

- + A statement regarding the purpose of the policy
- + Guidance on when officers must activate their BWC
- + Guidance on when officers are prohibited from activating their BWC
- + Guidance on when BWC activation is discretionary, including sufficient information to ensure officers activate them in an acceptable manner
- + Guidance regarding circumstances in which the officer may view BWC video footage before completing official reports, especially after critical incidents

⁵² IACP BWC Considerations April 2019; IACP Concepts and Issues Paper, July 2019; Final Report of the President's Task Force on 21st Century Policing, Action Item 3.3.3



- + Guidance regarding an officer's responsibility for downloading and initially storing BWC video footage

The ISP's current Body Worn Camera Testing Policy includes some of the following provisions. Section One describes the statutory circumstances in which officers must activate their BWCs, including when engaged in crowd control. The ISP has provided officers to assist cities in their responses to protests and mass gatherings. A benefit of BWCs is their ability to record protests and mass gatherings while modifying the behavior of crowd participants. The ISP should review BWC video footage to improve or modify training on its response to similar future events. The ISP should describe prominently in its policy how it uses BWC video footage to improve or modify its training efforts and assess officers' behavior and performance.

Whether and when to release BWC video footage is a question of considerable public debate. The ISP's policy should clearly address when and under what circumstances it would release BWC video footage. We recommend the ISP consider community input while developing its BWC policy to include guidance governing the release of BWC video footage to the public. Although best or recommended practices about when to release BWC video footage to the public is evolving, current practices link the release of BWC video footage to an organization's transparency and legitimacy. Some local and state governments are considering implementing laws governing when BWC video footage must be released to the public.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 6.1 | Ensure the state law enforcement agencies continue to evaluate their use of BWCs and determine how they can use this technology to improve the effectiveness and efficacy of their relations with the community. |
| 6.2 | Establish a standalone BWC policy for each state law enforcement agency. Ensure the policy includes guidance consistent with nationally recommended practices. Include guidance regarding the use of BWCs to inform training and education efforts. |
| 6.3 | Ensure the LETB supports the development of training and guidance for state law enforcement agencies on BWC use and implementation. |
| 6.4 | Ensure the community has a role and voice in developing and drafting the BWC policy. Provide guidance on how best to engage the community in this role. |
| 6.5 | Ensure the state law enforcement agencies establish consistent guidelines regarding the release of BWC footage, with a focus on disclosure rather than retention whenever possible. |



07 *Indiana State Police*

The Indiana State Police's mission (ISP) is to protect life and property in the State of Indiana from all foreign and domestic threats, investigate and deter crime, and promote roadway safety by upholding the State of Indiana's laws. By partnering with federal, state and local agencies, the ISP accomplishes this mission through effective patrols, investigations, intelligence gathering, innovative application of current technology and all crime policing efforts.

Formed in 1933, the ISP is comprised of over 1,300 sworn officers who provide the primary police services of criminal apprehension, crime reduction, traffic safety and homeland security. It also assists other state agencies with specialized police services such as aviation, emergency response (SWAT) and underwater diving and water rescue.

Interaction with the Public

The ISP has a proud culture and a tradition of being quiet professionals, dedicated to serving the public. We commend and respect the ISP for developing and sustaining such a standard, and the value its work lends to the community. We reviewed the methods the ISP uses to communicate with the public, recognizing that an agency well connected to the public enjoys greater support through the exchange of information.

The ISP has a public information program centralized at its headquarters. District-level Public Information Officers (PIOs) support the PIO Commander. Staff send agency-wide and statewide messaging and items of significant media or public interest from its headquarters, while district PIOs handle reporting of area-specific programs and incidents. Sometimes, the PIO Commander and the district PIOs repeat similar messaging to reach a broader audience or reinforce a particular message. ISP leadership encourages district PIOs to respond to incidents and attend events within their respective district to own its public messaging and to support the broader ISP mission. Although district PIOs have significant autonomy, they communicate with the PIO Commander regularly.

Although technological advances (e.g., social media, websites) afford many options for messaging, using the appropriate messaging tool and reaching the intended audience can be challenging. The PIO program leverages the ISP's website, social media (i.e., Facebook, Twitter, YouTube), television, print and a standing radio talk-show. Although its website contains significant information, users must navigate to find data and information. The website lacks interactivity and could be more user friendly. We recommend highlighting data such as annual statistics to share with the public. Although the site provides access to ISP statistics, a single comprehensive report is not available. Furthermore, the ISP has not produced an annual report in several years.



In assessing the ISP's outreach and attempts to attract individuals of color and women, we discovered that the ISP's website homepage photo features white male officers posted in formation with their commissions. The ISP's diverse personnel, assets and services are only represented on the recruitment webpage. The recruitment webpage photo shows the ISP's special services represented by multiple races and genders. The personnel's diversity, as well as that of police services, attracts potential candidates and informs the public of these special services.

The ISP could significantly enhance its methods of communicating its work to the public. Although we respect its tradition of quiet confidence, the ISP could inform and educate the public more effectively to garner widespread understanding and support of its mission. The ISP evaluates its effectiveness based on the input and interaction it receives after it renders services, such as a community engagement efforts or unsolicited interaction with the public. The ISP determines if the public is satisfied by whether it receives positive feedback after an event or positive comments from citizens outside of active policing. Although we embrace the face-face contact and believe this input has value, it comprises a small percentage of the greater public impacted by the ISP. Less satisfied individuals are less likely to approach an officer. A broader, more comprehensive engagement that includes surveys of Indiana residents would provide important information and assist the ISP in connecting better to those they serve.

The ISP has seen significant demand for specialized police services. However, the ISP has not supported this growth in demand by conducting a data-driven analysis of the needs and services provided, nor by increasing staffing. During our interviews we routinely heard of the impact that specialization has had on the ISP, particularly due to having fewer officers to perform basic law enforcement functions. Currently, for patrol services that once were provided by multiple officers, there are occasions where one officer is assigned to cover multiple counties. Our assessment revealed that the ISP has not focused on educating the public regarding these challenges, and to some extent its law enforcement partners, on the many roles it has undertaken to provide the community with more comprehensive law enforcement services while also assisting other agencies. Agencies that rely on the ISP's investigative experience may be unable to find an officer to respond when requested.

The ISP offers a wide range of services, including emergency response, explosive ordinance response, a K-9 team, boat and dive teams, and multiple investigatory functions. The ISP's aviation service has experienced a significant demand for services and the ISP has invested in the program to support that demand. The upgraded fleet includes three helicopters, two of which have a dedicated law enforcement search-and-track platform. Additionally, the ISP has invested in a Tactical Flight Officer (TFO) program to support enhanced search-and-track capabilities by having a second task-dedicated officer in the aircraft. The enhancements of the aviation fleet are some of the more visible ISP programs, which have had an immediate impact on the citizens and law enforcement agencies of Indiana. With the ISP's statewide reach and resource base, it is the most logical agency to address these specialized services as the smaller agencies across the state expect.



However, this specialization requires a dedicated focus, financial and personnel commitment beyond the traditional roles. The ISP has fewer sworn personnel to provide services than in the previous two years. As the ISP continues to address ever-evolving service needs, we encourage it to remain cognizant of the impact that staffing special services has on the number of visible and available officers who provide basic police services.

Internal Affairs

The ISP does not typically have a high annual number of inquiries or internal investigations, approximately 100 and 50 respectively. We believe the ISP would benefit from implementing process standards and using an electronic software program for case management of the complaints it receives and investigates. These advancements would increase consistency, accountability and transparency; inform commanders and leadership more effectively regarding potential issues of concern; and ensure personnel matters are addressed equitably.

Inquiries are formally initiated when a supervisor completes agency Form 553A. The supervisor then forwards the form through channels to the Internal Investigations Section for manual database entry. Because there is no formal record, if the form is lost or delayed in transit, staff cannot track its progress. Although supervisors are responsible for completing inquiries, they can request a reassignment of the task to an Internal Investigations Section investigator. The Internal Investigations Section Commander considers these requests on a case-by-case basis, and the Commander typically approves them. There is no standard in place to determine when it is appropriate to reassign these cases.

Once an investigation is initiated, Policy INV-015 directs that applicable supervisors keep the Internal Investigation Section Commander updated on the investigation's status. However, the policy does not describe the required reporting format and frequency of such updates. We recommend revising the policy to include a specific reporting format and timeline requirement for case updates to ensure better consistency and increase the organization, timeliness and completion of investigations. A supervisor initiates internal investigations during a case-by-case review of actions and behaviors. There is not a standardized case list or precedent. The initiation of internal investigations and subsequent discipline varies absent an established standard, allowing for inconsistency.

Although the ISP assigns general timeframes for the conclusion of inquiries or investigations, the ISP has not formalized or standardized these timeframes. Definitive completion milestones would represent the ISP's dedication to swift and certain investigations of officer misconduct. The section commander reviews pending cases in a face-to-face weekly meeting or more frequently, if required. This manual process depends on the involved commanders' institutional knowledge, availability and accessibility. We recommend the ISP implement an electronic tracking system for more timely and organized case updates and real-time identification of open cases.



The ISP manually tracks current and historical data of inquiries and investigations, including the respective discipline through a spreadsheet maintained by the Internal Investigation Commander. When accurately maintained, this spreadsheet records all officer inquiries or misconduct. However, it does not identify or call out themes or an individual officer's recurring behaviors. It is important to consider the Executive Order 13929 - Principles on Safe Policing and Use of Force, specifically Performance Management Tools – Early Intervention Systems. The executive order speaks to the value of early warning systems because they “provide procedures that encourage identification and assistance of law enforcement personnel who are becoming, or likely to become, at risk to violate use of force or other agency policies or procedures.”

We encourage the ISP to consider such an early warning system to identify problem behaviors more effectively and ensure consistency in how they address them. Such a system relieves the burden on any one commander to recall or identify a problem behavior, officer or trend by leveraging the system's analysis to identify and alert the agency. Although the ISP's processes and systems are familiar and effective to its command staff, they allow omissions, errors and inconsistency. Further, they provide significant challenges to the successors of tenured commanders.

Use of Force Investigations

Although the ISP tracks use of force incidents with the Shared Integrated Electronic Database (SHIELD), it does not have a flag process to warn of themes or repetitive officer incidents. ENF-012 Police Action Report or Vehicle Pursuit Report and Review requires officers engaged in any police action (e.g., discharge of a firearm or conducted electrical weapon, chemical agent use, physical force) to notify their appropriate district and complete a police action report in SHIELD. SHIELD does not push data reports, rather it depends on manual queries. Adding such an automated feature or requiring a supervisory query would provide critical early warnings for a specific officer at risk of engaging in misconduct, troubling agency operational patterns or inconsistent use of force. One of the ISP's long-term goals is to establish a single source-integrated platform to capture operational data, rather than continuing to use SHIELD and Caliber RMS separately. We recommend selecting such a system that is automated and provides the features mentioned above. We commend the ISP for taking one more step toward its goal by testing a revised Police Action Report in January 2021 that interfaces with the Caliber RMS.

The ISP's investigation and review process follow the traditional chain of command to determine if the subject officer's actions were consistent with its policies. Each level of command reviews the incident and forwards it onward. The policy directs a review of the incident by the subject employees' immediate supervisors; however, the involved employee completes the report. The policy does not require a supervisor to investigate the incident details or complete a report unless the employee involved is incapable of doing so or the use of force resulted in serious bodily injury or death. The Area Commander ultimately reviews the report. If the supervisor and commander concur, they forward the report to the Training Division. An officer experienced in the subject matter reviews the report and forwards it to the Legal Office, where the commander provides the final review. The ISP



takes steps, up to and including initiating internal investigations, to address actions revealed to be inconsistent with policy. The Police Action Review Board makes the final determination for any police action that results in serious physical injury or death. The board typically reviews between 10 and 12 cases each year and includes a representative from the area subject to its review, such as including an emergency vehicle operations (EVO) instructor when reviewing a commission crash.

Considering the state of law enforcement and community relations, specifically surrounding police brutality and the use of force, enhancing the ISP's tracking and notification process is a logical and valuable step to identify and address concerning officer and agency patterns. Additionally, requiring supervisory investigation of all use of force incidents, not just those that result in serious bodily harm or death, would significantly enhance the ISP's transparency to the public.

We recommend the ISP conduct a careful and comprehensive review of its use of force and associated policies that considers the guidance of the national consensus policy of use of force. The ISP should revise its policies to align with trends emerging in the broader police community.

Data Collection

The ISP does not have a full spectrum of electronic or automated systems or processes to support effective management decisions. In some cases, the ISP does not have a system or process, and in others, they system or process is not robust or effectively utilized, such as the traffic stop system detailed below. Good data supports knowledge, accountability and transparency to an agency's strategic mission, training and proactive policing operations. Additionally, automating its personnel-based systems could significantly increase the ISP's insight into individual employee actions and organizational trends.

Since the early 1990s, the ISP has captured the race of individuals involved in traffic stops. Its current and more formal process for tracking citations or written warnings is through Indiana Trial Court Technology (ITRT), a branch of the Indiana Supreme Court. The ISP implemented ITRT's electronic citation and warning system (eCWS) in 2008. The eCWS includes the race and gender of individuals stopped, and issues either a written warning or traffic citation. Although data is available through queries of the system and supervisors can request such reports, the ISP does not require that staff review this data to quantify the number of people of specific races who are stopped or review a specific officer's traffic stops. Further, the eCWS is incapable of automated reporting and lacks an early warning mechanism that alerts to potentially racially motivated policing or an officer's traffic stops that exceed any established statistical norms. Such automated programming provides an early warning to initiate a review of the involved officer's traffic stops and address any bias-based policing concerns.



Leadership had identified and addressed certain officers regarding their continual entry of “unknown” for the race of the individual with whom they interacted. This identification of an officer’s use of “unknown” demonstrates the value of increasing supervisory oversight of this process to ensure professionalism and to detect anomalies before they become problems. A formalized process would increase awareness and proactivity regarding the officer interactions with the public.

The ISP does not provide traffic stop data to the public. The Management and Performance Hub (MPH) gathers state agency data sets, conducts queries and releases information to the public. It releases any such ISP data only after conferring with the agency or in accordance with previously accepted standards for data set release. Although ISP uses the computer aided dispatch (CAD) Caliber RMS to process and capture patrol operations, officers do not have to document traffic stops. This could create instances in which officers conduct traffic stops but do not record the activity, creating incomplete and inaccurate traffic stop data.

We reviewed policy ENF-023 Traffic Citations and Warnings, which states that officers must document a stopped individual’s race and further that officers should only use “unknown” when an officer cannot reasonably discern the individual’s race. As indicated, we could not identify any instruction or guidance in ISP policies that reference a subsequent supervisory review of the race or gender statistics of stopped individuals.

Consent searches of vehicles is a nationally used key data search element. It helps identify how an agency interacts with the public, and whether its actions are consistent with organizational policies and law. The ISP does not collect data on when and how officers conduct searches in a format that supports an inquiry or review by management. Any information resulting from a search is captured in the narrative field of the Caliber RMS. This record does not identify an individual’s race or gender or the officer who conducted the search in a formatted, easily retrievable manner.

The ISP does not have an automated system for tracking officer misconduct complaints and internal investigations. The ISP manages its investigative process and data manually through forms and spreadsheets, which are inefficient and create challenges for a dispersed agency that covers the entire state. The ISP has a policy regarding internal investigations but has not created standards to support the process (e.g., when to initiate an investigation, whether a field supervisor or an investigator is assigned, updating the investigation’s status, required completion time periods, subsequent disciplinary measures). Such factors depend on the institutional knowledge of involved command staff to guide the process. During our interviews, we learned that an automated system would be beneficial and far more efficient, as these factors frequently surface as questions when leadership reviews reports and metrics.

The ISP analyzes data in other areas as well, such as its recent analysis of officer response times to calls for service. This supports the ISP’s mission and objectives.

Although the ISP tracks use-of-force incidents with SHIELD, this data entry system is not automated or integrated with other personnel-based systems. It does not have a flag process to warn of themes or repetitive officer incidents, which would allow for early intervention and redirection of inappropriate



work behaviors. The system does not provide push data reports to inform management; rather, it depends on manual queries. Developing automated flags and notifications, or requiring a supervisory query, can provide a critical early warning to officer or agency patterns regarding use of force and other behaviors which can then be corrected.

Technology

The ISP does not store its library of policies in an automated system. The ISP facilitates reviews of new policies, such as for the impending use of body-worn cameras (BWC), through email. The ISP does not formally document revisions and mandatory policy reviews, such as for a use of force policy, in a manner that includes the date and time or any associated attestation that could otherwise illustrate an officer's adherence to and competency in the guiding policy. An effective and efficient automated policy library that provides an electronic timestamp of agency and officer policy reviews could prove beneficial should questions arise regarding agency or individual policy reviews after to an incident. Such a system could also incorporate a routine administrative review schedule to ensure timely revisions of agency policies.

The ISP is developing a process to adopt BWCs agency-wide, per the direction of Governor Holcomb. It is in the final stages of selecting a vendor to supply nearly 1,000 cameras for officer use. The ISP had an operations policy for a testing period last year and is engaged in a project to develop its final operational policies. To do so, the ISP has reviewed policies from agency in and out of state, as well as best practice documents provided by the IACP.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 7.1 | Produce a comprehensive annual report of the previous year's successes and challenges to serve as an open, transparent and accountable document for agency personnel, the public safety community and the public. |
| 7.2 | Update the ISP website to enhance interactivity, provide readily accessible agency statistics and information, and increase the diversity of its images of Department personnel. |
| 7.3 | Seek greater public input regarding satisfaction with the ISP through increased communication channels, such as surveys. |
| 7.4 | Invest in a case management system to manage the internal investigations process that allows tracking and visibility into disciplinary measures to increase transparency, accountability and consistency. Ensure state law enforcement agencies share a single case management platform that provides exclusive protected access separately to each agency's own case data. |



| | |
|------|---|
| 7.5 | Revise ENF-012 Police Action Report to direct supervisory investigation of use-of-force incidents. |
| 7.6 | Implement an electronic use-of-force reporting and tracking system to capture incident information, including involved officers, for review and analysis and to inform areas of improvement and training needs. |
| 7.7 | Review all policies that reference use of force to ensure they are consistent with emerging standards implemented by the broader law enforcement community, such as the national consensus policy of the use of force. Include issues such as the duty to intervene, de-escalation and proportionality in the use of force. |
| 7.8 | Invest in an automated policy manual that records an electronic timestamp for revisions, review and attestation to increase accessibility and documentation. Similarly, establish a schedule for policy review and updates. |
| 7.9 | Require routine supervisory review of traffic stop data to promote awareness of potential agency or individual officer patterns of conduct. Support this review with annual analysis and reporting of demographics and other data associated with traffic stops. |
| 7.10 | Implement program updates or establish a new system to capture data points from conducted searches to allow for consistent reporting, review and analysis. |
| 7.11 | Encourage the ISP to share a single case management platform that provides exclusive protected access to its case data, while allowing for better data management and operational use within the ISP and in collaboration with the other state agencies, when appropriate. |



08 Capitol Police Services

The Capitol Police Services (CPS) provides for the safety and security and enforcement of code violations at the Government Center and a number of state properties, including the Governor's residence, the Indiana War Memorial Museum and Park, White River State Park, and the Soldiers and Sailors Monument. Once a civilian entity that reported to the Indiana Department of Administrative Services, CPS personnel later became sworn law enforcement officers. In 2002, legislative action brought the CPS under the Indiana State Police (ISP). CPS' enforcement duties are specific to state properties and do not include any patrol functions or enforcement on roadways. Its officers attend ILEA for basic training. Once commissioned, they begin their indoctrination to the ISP, including training, policies and procedures, administrative and operational support, and rank structure.

Internal Affairs

Historically, CPS has relied upon the ISP's investigative services. However, recent changes in the CPS reporting structure have prompted a focus on additional responsibilities and requisite training, such as in internal investigations. Although CPS conducts few internal investigations, a recent high-profile incident highlighted the need for additional focus in the area. The Internal Investigations Section Commander developed an internal investigations basic training course for CPS personnel. However, the ISP will continue to conduct internal investigations of high-profile cases.

Use of Force Investigations

CPS has had few use-of-force incidents. In most use-of-force incidents, the involved ISP officer completes the Police Action Report. During our interview with a CPS supervisor, the supervisor could not recall the last incident in which a CPS officer had used force. If such an incident occurred, the reporting and subsequent review would follow ISP ENF-012.

Recruitment, Hiring and Promotions

CPS is an entity of the ISP, and therefore its recruitment, hiring and promotions follow the ISP's policy. Importantly, CPS does not engage in independent recruitment efforts. In the past, a major lead the CPS with support from a captain, and CPS' operational command was assigned to a lieutenant and sergeants. With the retirement of the major and most recently the captain, ISP leadership evaluated the CPS' command structure for succession and sustainability. Realizing it was not feasible to replicate its previous command structure, they reorganized. On February 7, 2021, the ISP officially discontinued its previous rank structure. It assigned section command to the lieutenant and applied pay incentives throughout rank-and-file from funding previously designated to senior-level leadership.



CPS has suffered significant attrition due to its lower pay scale in comparison to the many other law enforcement agencies in the vicinity of the Government Center. The recent increased pay scale more closely aligns with area agencies and the officers who are often assigned to the Government Center and work beside a CPS officer. Given the challenges that the CPS faces with officer attrition and the impact that retention has on maintaining a comprehensive Department-specific rank structure, the recent structure change is a promising option to address both staffing challenges. A final reporting structure up through the ISP has not yet been finalized. In the interim, the section commander reports directly to a lieutenant colonel. Although this is an unconventional reporting structure, in this instance, it provides familiarity and consistency during the transition period. Additional training and personnel considerations continue to evolve to support the new organizational structure.

Technology

Fragmentation exists across CPS' various technologies. The end-user responsible for security at the Government Center could benefit from establishing a baseline catalogue of which technologies are in place; who owns, maintains and monitors them; and most importantly, who responds to alarms or anomalies. The CPS' alarm system has not been recently audited. The number of active alarms, some in areas renovated for other uses since their initial installation, is unaccounted for. Additionally, the Indiana Department of Administration purchased a small number of alarms several years ago on a first-come, first-served basis. Although activated alarms generate immediate response, there is some confusion or misunderstanding among the security services and employees about which agency will respond for alarms at state buildings.

Similarly, the ability for the end user to influence security measures and leverage technology is minimal. For example, like many government buildings, the success of the security measures at the Government Center largely depends on compliance by the public. However, eliminating some entrances and leveraging available technology for the Government Center would allow CPS to improve its security posture. Reducing employee entrances and incorporating automatic call-up of the video surveillance and card access reporting would significantly enhance accountability, while discouraging piggybacking and tailgating. Additionally, CPS could relieve officers of standing post at multiple doors and redirect them to more active security measures, including staffing patrol routes.

We found the Allied Universal Security Officers to be polite and professional in our examination of public entrance procedures. Upon entry to the Statehouse, we were greeted, directed to remove items in our pockets and place items in a tray for a screener to examine. We were then directed to a walk-through metal detector (WTMD). When a member of our team activated an alarm, the screener politely instructed them to check their pockets and enter the device a second time. A CPS officer posted at the rear of the screening location observed the process. CPS does not supervise or instruct the security officers. However, if the posted CPS officer identifies an issue with screening, they are encouraged to identify it immediately to the security officer. CPS officers do not complete training in the use of WTMDs or the screening process. If CPS officers receive screening training and engage in



brief training drills with the security officers to evaluate their response to a weapon or disruptive patron, the Statehouse's overall security posture would improve.

As CPS has experienced changes in its structure over the years, so has its radio dispatch system. The ISP command evaluated the standalone CPS dispatch program and determined it was no longer effective or sustainable, and the dispatch responsibility was transferred to District 52. This increased not only the effectiveness and sustainability of the dispatch services, but also its competency and awareness by having a more robust pool of highly trained, skilled and tenured dispatchers. Having CPS on the same radio channel enhances officers' awareness of events in and around the Government Center.

The Government Center does not have a shared surveillance center that encompasses the larger campus. Multiple entities can access surveillance cameras covering the area, many of which are not on a shared platform. District 52 does not have direct access to the surveillance cameras at the Government Center. The ISP Operations Center in the basement of the Statehouse, staffed on a 24-hour basis to support the ISP, has limited accessibility to the cameras. The Statehouse Control Center, staffed by the Indiana Department of Administration (IDOA) and Allied 24/7, monitors the fire control panel and additional surveillance cameras. The State Fusion Center, Emergency Operations Center and Department of Homeland Security are housed in the Statehouse basement with each operating independently. While we acknowledge the individuality of these entities, we encourage the entities review their operational processes to determine if opportunities exist to leverage resources.

Security Operations

CPS officers respond and enforce laws at their assigned properties, while security officers at entry control points process incoming patrons and enforce parking. CPS officers observe the entry control procedures facilitated by security officers. The procedure of having an armed officer supporting the screening procedure is a widely accepted practice in similar venues. However, due to CPS' limited staff of less than 50 officers, they are not as effective in proactive law enforcement functions.

The level of attrition in both security and CPS officers is worthy of consideration. Like other law enforcement officers assigned to statehouses, CPS officers generally have short tenures, opting instead for employment at local police departments that offer significantly higher salaries, the allure of a faster-paced work environment and opportunities for advancement. Often, the parent agency's officers work alongside CPS officers, just as ISP officers support law enforcement presence during legislative session and special or emergency events, such as the protests in summer 2020. During these protests, ISP assigned hundreds of officers to the statehouse to provide additional security and address civil unrest. CPS is negatively impacted by the same challenges as other states, and CPS' ability to retain officers is limited. The recent restructuring of ISP command staff attempts to address CPS' salary disparity. This was a significant pay increase, aligning CPS officers more closely to the ISP and agencies in the Indianapolis area. The security provider indicated it too suffers attrition challenges.



In addressing the structure change within CPS, we acknowledge that succession challenge, and the law enforcement function in general, are not unique to Indiana. Statehouses across the country face similar challenges, and the reporting structure is typically linked to its parent state law enforcement agency. We commend the ISP for identifying these challenges, as well as their potential solution in the change in command structure and associated salary increases.

The use of both CPS personnel and security officers provides adequate entry point security and is consistent with operations in other state capitol buildings. However, CPS cannot conduct proactive policing activities due to insufficient staffing and a failure in leveraging of technology. Limiting entry control points and establishing real-time monitoring of access controls and automatic video call-up for entry alarms, would significantly enhance security measures and allow more flexibility in officer assignments and patrol.

CPS' recruitment and hiring practices are facilitated through the ISP. The security provider's hiring process begins with posting "government building" as the location for a vacant position. An interview precedes a brief tour of the statehouse and a second interview with the site manager, who ultimately decides if the applicant is an acceptable fit. Applicants who meet approval are subject to state and federal background checks, fingerprinting and a drug screen.

Successful candidates complete basic security officer training consisting of three modules: basic security procedures, report writing and patrol customer service. Employees are required to achieve an 80 percent cumulative score on the exams, or they must wait six months before they can reapply. Upon passing, they train for two or three days at the Government Center with the site supervisor or assistant site supervisor. They complete X-ray and WTMD training on site in addition to basic entry control point and access control screening training. Employees are required to complete 20 online training modules within the first six months of their employment.

We determined the security operations manual is not user friendly to an officer unfamiliar with its processes and procedures. For example, the manual omits a table of contents, tabs and a reference guide that would otherwise aide performance in a crisis. Even minimal revisions could significantly enhance the manual's usefulness to a security officer.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 8.1 | Establish a baseline catalogue of available and shared technologies, including the ownership and operation of the technology. |
| 8.2 | Encourage the commander to engage opportunities to advance security operations considering CPS' recent restructuring. |



| | |
|-----|--|
| 8.3 | Train CPS officers in general screening procedures to ensure safety. Ensure the training covers the operation of walk-through metal detectors and hand-held metal detection devices. Conduct field screening drills in partnership with the guard services that staff the entrances to the buildings where they provide security services. |
| 8.4 | Establish a protocol for emergency alarms along with the IDOA and other relevant partners. Include the total number of alarms and each alarm's location, type and activation features. Develop monitoring and response protocols for the involved parties and conduct routine drills of these protocols. |
| 8.5 | Develop a protocol that supports the shared visibility into key surveillance video footage and has the shared goal of using a shared operating platform that facilitates real-time awareness of actions on the Statehouse property across the various entities with cameras covering the area. |
| 8.6 | Consider enhancing security posture by minimizing points of entry and ensuring unstaffed entry locations have door alarms and cameras. Implement real-time access control monitoring and automatic video recall of alarms. |
| 8.7 | Consider consolidating the separate state agency communication centers housed in the basement of the Government Center. |
| 8.8 | Encourage the CPS to share a single case management platform that provides exclusive protected access to its case data, while allowing for better data management and operational use within the CPS and in collaboration with the other state agencies, when appropriate. |



09 *Indiana State Excise Police*

The Indiana State Excise Police (ISEP) is the law enforcement division of the Alcohol & Tobacco Commission. Statute empowers ISEP officers to enforce the laws and rules of the Alcohol & Tobacco Commission and State of Indiana. The ISEP's mission is to provide quality service and protect the morals and welfare of the people in the State of Indiana. ISEP agents focus on education and enforcement targeted at the sales and underage use of alcohol and tobacco to prevent and minimize associated injury and deaths.

Internal Affairs

Although the ISEP has only 75 members and has a significant number of internal investigations, it frequently completes statements of charges for violations of standard operating procedures. Most of these violations are damage to ISEP commissions (i.e., cars) including scratches, dents, cracked windshields and other damage from traffic crashes. Over the past three years, the ISEP conducted the following number of internal investigations:

- + **2018:** 49
- + **2019:** 62
- + **2020:** 45

The supervisory team that manages the internal investigative process understands the process and finds that it serves a functional purpose; however, they acknowledge gaps exist. Previously, a lieutenant was assigned to OPS to serve as a neutral investigative party. Despite some changes in recent years, the ISEP has not yet formalized its internal investigative process. Currently, the captain in command of the district where the subject employee is assigned conducts all internal investigations. The captain completes the investigation and recommends discipline to the disciplinary review board, comprised of the other two district captains and the HR administrator. An adjacent captain completes the investigation when a conflict of interest is present. It is a good practice to have a neutral party conduct internal investigations, such as a captain assigned outside of the employee subject's district.

Although ISEP leadership has already implemented changes to address inconsistencies that we identified regarding tracking internal investigations electronically, additional changes could serve the ISEP and minimize the need for employee action more effectively. ISEP policy BA-016 Internal Affairs provides guidelines for the internal investigative process; however, we recommend the ISEP review the policy to address inconsistencies in initiating investigations and subsequent discipline. For example, a supervisor can initiate an investigation of a citizen complaint or policy violation without notification to the formal chain of command. Before HR or the disciplinary review board is aware of the action, a supervisor can engage in and complete an investigation, thereby preventing further action.



HR maintains past internal investigations records, including employee disciplines, on paper rather than a digital system, which limits transparency on discipline data. The ISEP uses a report management system, which could also store internal discipline files. However, the system cannot adequately restrict ISEP personnel from reviewing its contents, including disciplinary records with confidential personal information.

The ISEP implemented a solution to improve its storage and access to personnel files. The files are stored digitally for easy access and ability to query investigative data and discipline rendered. This solution, although not ideal, is acceptable. We commend the ISEP's responsiveness, which demonstrates the resiliency of the agency to problem solve and work within its budgetary constraints. This digital solution provides a platform from which to access individual employee records and disciplines rendered, and to help identify frequent policy or SOP violations.

The ISEP has limited transparency, accountability and consistency in its internal investigation and disciplinary processes. The ISP can improve its accountability by requiring the applicable supervisor forward an overview of any proposed investigation or complaint to the Office of Professional Standards (OPS) or HR, as appropriate under policy. Through OPS or HR, the personnel manager can review historical investigative data and can review the case to ensure the investigations are consistent with past practices and current agency focus before making any investigative determination or disciplinary decision. Previously, a lieutenant was assigned to OPS to serve as a neutral investigative party.

The ISEP's disciplinary review board was formed approximately one year ago. Before the inception of the disciplinary review board, any of the six area lieutenants decided whether to commence an investigation and subsequent discipline, which created inconsistencies across the ISEP. The disciplinary review board does not use a discipline grid or matrix. Rather, it relies upon its members' institutional knowledge to render fair and objective discipline. Although this is an improvement from the previous practice, a matrix would offer consistency in discipline.

The ISEP does not have digital reporting systems that allow for the identification of trends or patterns. The ISEP is a small agency with a relatively low number of personnel actions. The Office of Personnel could review these records semiannually to identify trends, such as frequent specific policy violations, which may suggest the need for additional training or policy revisions. Given the agency's size, supervisors know their employees and such a review can address and identify issues or trends early.

Use of Force Investigations

The ISEP engages in a limited number of use-of-force incidents. To examine the ISEP's use of force processes, we reviewed ISEP policy FO-007 Reasonable Use of Force, revised on June 18, 2020. This revision demonstrates the quick and decisive actions leadership took to address use-of-force policies following the actions viewed as contributing to George Floyd's death in Minneapolis,



Minnesota. The ISEP revision, which aligned with many agencies across the nation, prohibits officers from using chokeholds and vascular neck restraint except when deadly force is authorized. The policy prohibits shooting at or from a moving vehicle and requires the duty to intervene. The ISEP policy does not include requirements for de-escalation. De-escalation is widely recognized as a best practice to reduce and limit the need for the use of force. Like other smaller state agencies, it does not require a supervisor to investigate use-of-force incidents unless they involve serious bodily injury or death.

ISEP policy BA-022 Use of Force Review Board addresses the review process. The ISEP uses a cross-disciplinary team comprised of five members to review all use-of-force cases. The respective investigator forwards the incident details to the board members, who then submit their findings to the broader disciplinary review board.

Over the past three years, the ISEP recorded the following use-of-force incidents:

- + **2018:** 13
- + **2019:** 13
- + **2020:** 2 (partial data)

Data Collection

ISEP policy FO-018 Bias-Based Profiling prohibits bias-based policing. Agent enforcement contacts are tracked through the Uniform Traffic Ticket (UTT) Electronic Citation and Warning System (eCWS) of the Indiana Trial Court Technologies, which captures ticket recipients' race and gender. The ISEP's unique operations do not readily allow the ISEP to capture all contacts, only when a citation is issued. As with the other state agencies we assessed, the ISEP does not have a process that directs or requires a review of the data points. Such a process would inform supervisors of any patterns or trends at the officer- and agency-level and allow for proactive supervisory intervention.

Technology

We reviewed the ISEP's policy management process, which includes reviews of policies regarding use-of-force, firearms and emergency vehicle operations in its mandatory annual officer training sessions. These reviews are consistent with best practices for such management operations. These policy reviews occur at district or regional training sessions, so officers can discuss concerns or request clarification. The officer or the supervisor documents the yearly training in an incident report form (IRF) in the ISP's system including an outline of the training content.



The ISEP does not have a schedule for an administrative review of policies to ensure the content is current. It revised many of its policies in 2016, when leadership decided to conduct an unprompted review. Furthermore, the ISEP does not have a schedule for officer review of policies. Rather, officers assigned to specific disciplines prompt policy reviews in their respective areas of expertise. The ISEP may not assign officers to review less significant policies for years. The ISEP is considering requiring an annual officer review of all agency policies. The ISEP should consider a review schedule in which officers review policies with an operational focus monthly, beginning with those most relevant to daily operations, rather than a blanket annual review.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 9.1 | Improve public messaging by focusing on digital communications that include successes and challenges to provide an open, transparent and accountable approach to engaging with the public. |
| 9.2 | To increase transparency, accountability and consistency, invest in a case management system for the inquiry and internal investigations process that can track disciplinary measures for easy reference. Ensure the state law enforcement agencies share a single case management platform that provides exclusive protected access to each agency of their own case data. |
| 9.3 | Require the applicable supervisor forward an overview of any proposed investigation of a complaint or internal investigation to the Office of Professional Standards or HR. |
| 9.4 | Revise use-of-force policies to include a requirement for de-escalation when engaged in use-of-force incidents and a supervisory investigation for all use-of-force incidents. |
| 9.5 | Implement an electronic use-of-force tracking system to capture incident information including the involved officers to support ongoing evaluation. |
| 9.6 | Conduct a semiannual review of complaint data and use-of-force data to identify trends and to establish mitigation measures, including training and policy review. Establish a process to evaluate this data to provide opportunities for early warning of at risk and problematic behaviors on the part of personnel. |
| 9.7 | Invest in an automated policy manual to record an electronic timestamp for revisions and reviews to increase accessibility and to create an attestation and documentation log. Similarly, establish a schedule for an administrative policy review and officer review of the manual. |
| 9.8 | Encourage the ISEP to share a single case management platform that provides exclusive protected access to its case data, while allowing for better data management and operational use within the ISEP and in collaboration with the other state agencies, when appropriate. |



10 *Indiana Conservation Officers*

The Indiana Department of Natural Resources (IDNR) Law Enforcement Division (LED) employs 214 Indiana Conservation Officers (ICOs) who serve the public and protect the State of Indiana. The LED has its headquarters in Indianapolis and operates 10 law enforcement districts throughout the state. In 1897, the legislature gave the Commissioner of Fisheries power to appoint at least one deputy in every county. In 1911, an act established game wardens. The LED is the state's oldest law enforcement agency and one of its most diverse.

In addition to enforcing state laws, ICOs are active in a variety of non-law enforcement activities, such as boater, snowmobile and hunter and trapper education programs, the Karl Kelley Youth Camp and the Becoming an Outdoors Woman program. Specialty river rescue, cave rescue, underwater search and recovery and K-9 units are available statewide. ICOs use an assortment of boats, snowmobiles and off-road vehicles, and are a unique resource during emergencies and natural disasters. ICOs receive specialty training in areas such as river rescue, advanced rescue SCUBA, firearms, emergency vehicle operation, alcohol breath test and defensive tactics.

The Division's Investigation Section works closely with other IDNR divisions, state and local agencies, and federal partners including the U.S. Fish and Wildlife Service, the Environmental Protection Agency, the FBI and the Canadian Wildlife Service. It receives information from federal, state and local agencies and the public.

Interaction with the Public

The IDNR prides itself on its conservation efforts and providing policing services to the public. Its message is professionalism and service. ICOs are peace officers, and the LED encourages them to find solutions to any police action they encounter. When bad weather creates an increase of need, ICOs investigate traffic crashes to assist other agencies. ICOs routinely assist other agencies that may be short-staffed.

The IDNR focuses on structured and one-on-one education. Its hunter education program reaches nearly 20,000 youth annually. ICOs provide personal education when they encounter a violation they determine they could handle more effectively by sharing educational information rather than enforcement action. Like many agencies, ICOs have a great deal of discretion in how they handle a situation; however, the IDNR's mission is to seek opportunities to educate.

The IDNR has a robust public information officer (PIO) program with 22 officers across the state. The primary PIO is in Indianapolis and coordinates state-wide messaging, while area PIOs report and address topics specific to their respective locations. The PIOs promote the IDNR's mission on social media and press releases and when it has significant cases that generate public interest. The IDNR creates a comprehensive annual report that details the number of each type of contact by quarter.



The IDNR finds that Indiana residents who engage in outdoor recreation can identify its ICOs, while residents who do not participate often cannot. During our interviews, we learned that although the number of people hunting is decreasing, the IDNR has seen a significant increase in attendance at state parks in 2020, which interviewees said was due to families seeking alternative activities during the COVID-19 pandemic. As a recruitment strategy, the IDNR has reviewed its hunter education roster for potential applicants to become ICOs.

Internal Affairs

SOP Internal Affairs, Investigation 3 provides guidelines for the investigation of officer misconduct. Individuals can make allegations of misconduct in person, over the phone or in writing. Policy directs supervisors to contact the complainant and verify their information to determine if an investigation is warranted. If warranted, the supervisor notifies the Office of Professional Standards (OPS) and initiates an investigation of the incident, unless criminal actions are or become apparent, at which time OPS assumes the investigation.

The Records of Professional Standards (RPS) captures all misconduct complaints lodged against ICOs and the subsequent investigative disposition. Agency SOP Enforcement 29 provides guidelines for the disciplinary review of completed investigations.

The IDNR's disciplinary action board is comprised of the executive officer, who is a non-voting member, the operations major and additional command-level officers, including regional captains. A designee may replace regional captains when conflicts of interest arise. Each of the five voting members make disciplinary recommendations. Although the IDNR follows progressive discipline, the director or designee can impose the discipline commensurate with the seriousness of the misconduct. Although the IDNR follows a well-structured process for investigating misconduct, and unanimous disciplinary recommendations move quickly to a statement of charges, inconsistent recommendations prompt open board discussion to determine outcomes. We recommend the board refer to a matrix or grid, or a historical document of all agency misconduct, to increase its transparency and consistency.

Use of Force Investigations

The IDNR revised its use of force policy, SOP Enforcement 23, on July 26, 2020, in conjunction with the renewed national focus on use of force in the wake of George Floyd's death in Minnesota. The IDNR sought guidance in drafting the policy from the Indianapolis Metropolitan Police Department, with whom it has a close working relationship. The IDNR directs ICOs to complete training on the policy annually. The SOP provides ICOs guidance on use of force and the investigative process. Any ICO who uses force must enter the details in an IRF, after which a supervisory review occurs. A supervisory response and investigation only occur after instances of serious bodily injury or death. Considering the massive geographical area to which the supervisors are assigned, we acknowledge that supervisory response to all uses of force is challenging. However, the IDNR could increase its



accountability and transparency by requiring a supervisory notification as soon as practical following the use of force so immediate engagement can occur.

The IDNR has few reported uses of force. Over the past three years, the IDNR recorded the following uses of force:

- + **2018:** 1
- + **2019:** 7
- + **2020:** 1 (partial data)

However, as with other smaller state agencies, it is unclear if its ICOs report all incidents or only those they perceive to be worthy of reporting. We determined all use of force incidents reported for the three-year period of 2018 through 2020 were within policy and no training or discipline was issued.

Data Collection

Just over 30 ICOs actively use the Electronic Citation and Warning System (eCWS) for enforcement activity, primarily those in areas where local courts mandate the use of electronic filing. Significant challenges exist in that boating, hunting and property regulations are not included in the system, and thus do not have corresponding charges. ICOs manually enter most enforcement activity into the system. The IDNR engaged in a project with Indiana Trial Court Technologies to rectify the eCWS programming issues, and they included the non-traditional code sections in January 2021. However, the eCWS still does not interface with CODY, the primary agency records management system, creating the need to enter the enforcement information from the eCWS into the larger data system that holds all records.

SOP Communications 9 states that an IRF is the standard reporting mechanism for all ICO activities, such as training, public contacts, enforcement and investigations. IRFs are categorized as “pending” in CODY until a supervisor reviews and clears them. Generally, this provides a supervisory review of any activity. However, like the other state agencies we assessed, the IDNR does not have an early warning mechanism that notifies supervisors to potentially problematic officer behavior patterns. These patterns can include repeated officer contacts with a specific race or gender as reflected in issued warnings, citations and arrests. The IDNR also does not have a policy to guide subsequent action should any such bias-based policing behavior occur. The IDNR’s use of eCWS data provides some oversight, and we commend the IDNR for collecting and analyzing this data annually. However, as indicated, overall officer engagement with the eCWS is low.



Technology

The IDNR does not store its policy manual in an automated system. Rather, the IDNR facilitates reviews of new policies and revisions manually. The last complete policy review occurred in 2000 in conjunction with a CALEA accreditation, which the IDNR is no longer seeking. Command-level officers facilitate administrative policy reviews on an ongoing basis, with no specific schedule or rotation.

We recommend the IDNR automate its policy manual to document officer policy reviews. The IDNR should retain electronic documentation of policy revisions, such as its revision to use of force policy and its mandatory annual policy review. An automated system documents the date, time and attestation associated with a policy review and provides documentation of adherence and competency as prescribed in policy. An automated policy manual would allow the IDNR to account for all policies and the officers' review of them effectively and efficiently. Such a system stores the policies and an electronic timestamp noting when each officer reviewed the policy. This information can prove beneficial should any question arise after an incident.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 10.1 | Enhance public messaging through the Department's official website to include the IDNR's successes and challenges and act as a transparent and accountable platform for public safety. |
| 10.2 | To increase transparency, accountability and consistency, invest in a case management system for the inquiry and internal investigations processes that includes tracking disciplinary outcomes. Ensure the state law enforcement agencies share a single case management platform that provides exclusive protected access to each agency of their own case data. |
| 10.3 | Revise use-of-force policies and reporting to require officers to report all incidents. Include the requirement for supervisory investigation of all use-of-force incidents. |
| 10.4 | Establish a process to audit use-of-force and internal investigations to provide opportunities for early warning of ICOs at risk of engaging in problematic behaviors. |
| 10.5 | Continue to work with Indiana Trial Court Technologies to program IDNR code violations into the system. |
| 10.6 | Consider investing in an automated policy manual capable of recording an electronic timestamp for policy revisions, review and attestation to increase accessibility and documentation. Absent an investment in technology, establish a schedule for an administrative policy review and ICO review of policies and track the date and time for revisions and review. |



10.7

Encourage the IDNR to share a single case management platform that provides exclusive protected access to its case data, while allowing for better data management and operational use within the IDNR and in collaboration with the other state agencies, when appropriate.



11 *Indiana Gaming Police*

The enforcement and regulation of gaming in Indiana was facilitated by the Indiana State Police until the Indiana Gaming Commission (IGC) formed as a separate agency in 2006, making it the newest enforcement agency in Indiana. IGC agents focus on regulatory practices and have diverse career and life experiences, typically not as closely aligned to the work done at a traditional law enforcement agency. IGC agents address gaming regulatory practices and enforcement ranging from casino operations to athletic events to bingo and animal fighting.

Interaction with the Public

The IGC is relatively small and could benefit from increased communication with the public to demonstrate its value and to attract a diverse applicant pool. We accessed the “About Us” section of the IGC website to learn more about the agency and what they do. We found an impressive mission statement that provides a guiding principle for agents, but it does not explain what the IGC does. The mission statement is as follows, “The mission of the Indiana Gaming Commission is to provide a fair, transparent and dynamic regulatory environment that encourages economic development while requiring the highest level of integrity of all activities under its jurisdiction.” This statement references to the IGC’s activities but does not expound on what those are. Although it is important to highlight the IGC’s mission, we recommend it take the opportunity to communicate its work and value to the public in this section of the website.

Like the other state agencies, IGC leadership do not seek to broadcast the IGC’s work. Rather, leadership believes that if the public has a safe and enjoyable experience while visiting state-regulated gaming locations and did not need to engage with or observe a gaming agent, then the IGC has been successful.

Internal Affairs

The IGC does not have automated systems or processes in place that provide information it can leverage to support the knowledge, accountability and transparency of its personnel. Former President Trump’s Executive Order 13929 - Principles on Safe Policing and Use of Force, specifically Performance Management Tools – Early Intervention Systems, addresses this important topic stating law enforcement agencies should “provide procedures that encourage identification and assistance of law enforcement personnel who are becoming, or likely to become, at risk to violate use of force or other agency policies or procedures.” Consistent with EO13929, societal focus on officer accountability during interactions with the public demands that law enforcement agencies track complaints, internal investigations and use of force incidents. Although ideally such information is stored in one central location to provide clear oversight to supervision and leadership, we acknowledge that the IGC is a relatively small agency and has minimal internal investigations, only eight in the past three years.



The Excel spreadsheet that the IGC uses to track investigations has only basic information, such as “policy violation” for the cause of the investigation. We recommend using a more comprehensive tracking system that includes a historical perspective on investigations to reveal which policy violations have resulted in internal investigations. Leadership could analyze this information to identify when an administrative review of the policy or additional training may be needed. A more detailed system also provides a reference guide to ensure disciplinary measures are consistent.

Over the past three years, the IGC documented the following number internal investigations:

- + **2018:** 3
- + **2019:** 1
- + **2020:** 4

Use of Force Investigations

Policy ENF-002 Use of Force mandates IGC agents notify supervisors of use of force incidents, but it does not require supervisors conduct a supervisory investigation, including after uses of deadly force. Although policy requires notification of a use of force incident, there is less clarity among the agents regarding which actions they should notify their supervisor about.

IGC agents must notify a supervisor and gather supporting information. Every incident we reviewed within the three years of use of force data from 2018 through 2020 was compliant with policy and no discipline was issued nor was training recommended. We recommend the IGC modify the policy and procedures to describe clearly the supervisory investigative process following any use of force to increase supervisory involvement and agency transparency.

GEN SOP-05 Firearms Discharge mandates the involved officer complete a pre-formatted internal agency form, routed for review through supervisory channels, and a statement of findings, submitted to the executive director. This includes any discharge of a firearm outside of qualification, matches, target practice or hunting. The use-of-force policy includes the best practice of identifying the value of preservation of human life, the use of de-escalation and the duty to intervene. Additionally, the policy prohibits discharging warning shots and shooting at or from a moving vehicle. The policy does not address the use of chokeholds or vascular neck restraint, although leadership noted that a final policy revision is pending. Given the current focus on banning these use-of-force options, we recommend the IGC review EO13929 and the National Consensus Use of Force model policy as leadership drafts its final revision.



ENF-019 Conducted Electrical Weapons (CEW) provides guidance for the training, certification, carrying, using and reporting of CEWs, commonly referred to as Tasers. It also includes guidance on data downloads and evidence collection following a discharge of a CEW. Although we commend the IGC for implementing the best practice of data downloads, we encourage the IGC to use the data download information and conduct supervisory audits to detect any anomalies or trends.

LEG-01 Use of Force (Legal) includes an attachment with the pre-formatted internal agency reporting form. However, the policy does not include the requirement to complete the form nor explain the process for the subsequent review. The IGC General Policies Document also references the form. Although the content is essentially the same, IGC has three use-of-force policies, as well as a reference in the General Policies Document. We commend the IGC for addressing the agency's structure in policy, such as separating the enforcement division, yet we recommend the IGC condense this information into one all-inclusive use-of-force policy.

Over the past three years, the IGC recorded the following number of use-of-force-incidents:

- + **2018:** 26
- + **2019:** 24
- + **2020:** 6 (partial data)

Data Collection

The IGC does not have a robust data collection system for key operational data points, which when coupled with its unique duties, contributes to its lack of race and gender data regarding individuals its agents contact. Like ICOs, few IGC agents use eCWS to capture enforcement contacts, which could otherwise provide data for analysis. We recommend the IGC develop a data collection system to record individuals contacted by agents and conduct a supervisory review of that data to detect any anomalies or patterns.

Technology

The IGC's policy manual is not stored in an automated system, although it is on a specific computer drive for officers to access. We recommend the IGC automate its policy manual to document officer policy reviews.

The IGC facilitates officer reviews of new policies and revisions through email. Once they complete their review, officers acknowledge the review on a document filed for future reference. We recommend the IGC retain electronic documentation of officers' reviews of revisions and mandatory annual policy reviews where required, such as the use-of-force policy. By maintaining records such as the date, time and associated attestation following an officer review, the IGC would have



documentation of adherence and competency as prescribed in policy. An automated policy manual would allow the IGC account of all IGC policies and the officers' reviews of the same effectively and efficiently. This information can prove beneficial for the IGC should any questions regarding agency or individual policy reviews arise after an incident.

The IGC leadership updates policies as the need arises. For example, following George Floyd's death in Minnesota, the IGC revised its use-of-force policy. However, the IGC should develop a formal review and revision schedule.

It is unclear whether the individual gaming facilities have emergency response plans that state the IGC's role. The IGC could benefit from a policy to guide its response to a critical incident or emergency. Such a policy should include Incident Command System (ICS) training and describe agents' roles and responsibilities during a crisis management situation.

Recommendations

| Rec. # | Recommendation |
|--------|---|
| 11.1 | Enhance public messaging on the Department's official website to include the IGC's successes and challenges to serve as an open, transparent and accountable platform for public safety. |
| 11.2 | Develop processes to help manage the complaints and to identify risk behaviors. Given the relatively low number of complaints, the IGC should develop an internal tracking system. However, to increase transparency, accountability and consistency, consider investing in a case management system for the inquiry and internal investigations process that includes tracking and reference of disciplinary measures. Ensure the state law enforcement agencies share a single case management platform that provides exclusive protected access to each agency of their own case data. |
| 11.3 | Establish a comprehensive use-of-force reference policy. Review the policy to ensure it has an appropriate focus on emerging national standards and best practices that call for inclusion of de-escalation, includes a requirement for a duty to intervene, addresses proportionality in use of force, and establishes a supervisory review of all use of force incidents. |
| 11.4 | Consider investing in an automated policy manual capable of recording an electronic timestamp for policy revisions, review and attestation to increase accessibility and documentation. Absent a technology investment, establish a schedule for an administrative policy review and ICO review of policies and track the date and time for revisions and review. |
| 11.5 | Establish a process to audit use of force and internal investigations to provide opportunities for early warning of officers at risk of problem behaviors. |



11.6

Encourage the IGC to share a single case management platform that provides exclusive protected access to its case data, while allowing for a cost-effective way to provide data management and operational use both within the IGC and in collaboration with the other state agencies, when appropriate.



Conclusion

Law enforcement standards are changing, and the nation has put a more intense focus on law enforcement officer training. We commend the State of Indiana for taking the opportunity to analyze the training standards, curriculum, policies and practices of the Law Enforcement Training Board, the Indiana Law Enforcement Academies, the Indiana State Police, the State Excise Police, Indiana Conservation Officers, Capitol Police Services and the Gaming Police.

The law enforcement academy officials we spoke with were highly motivated to support their core mission and were open to making improvements. The staff from the law enforcement agencies that we reviewed are optimizing the systems they use and are creative in their use of the resources they have. Throughout the report, we identified areas that could further enhance their operations. We encourage these officials to closely examine our recommendations and ensure their agency is transparent, accountable and prepared should an officer's action cause the agency to have to address inquiries and scrutiny from the public and the media.

We hope this report provides a strategic roadmap for continued improvement of state law enforcement operations and training to help the State of Indiana achieve its ultimate goal of providing best or emerging best practice services to its communities. We have no doubt that the numerous stakeholders possess the capacity to make our suggested improvements so the State of Indiana's law enforcement agencies can become role models for other states.



Appendix: The Hillard Heintze Team

Executive Guidance

Kenneth A. Bouche, Chief Operating Officer



As Hillard Heintze's Chief Operating Officer, Ken has helped the firm's CEO transform a small team of seasoned professionals into one of the leading security risk management firms in the world. Ken has advised clients across many industries and sectors on how to align their security strategies with their corporate strategies to improve efficiencies and effectively mitigate risk. He currently guides the performance of the firm's operations from end-to-end, across all six of its practices. Ken's depth of experience in the justice and homeland security space includes serving as a member the IJIS Institute's Board of Directors from 2009 to 2013 and chairing the Global Justice Information Sharing Initiative from 2001 to 2006. He served as a national leader in improving America's information-sharing capacity and implementing post-9/11 intelligence reforms. Ken dedicated 23 years to the Illinois State Police (ISP). As Colonel and CIO, he was responsible for modernizing and standardizing the agency's technology functions. He oversaw the delivery of critical real-time information to more than 1,000 police agencies and 40,000 police and justice end-users on a 24-hour basis.

Debra K. Kirby, Esq., Senior Vice President



Debra serves as the Senior Vice President for Hillard Heintze's Operations. She drives efficiency in our operations and supports our larger law enforcement and cross-practice projects for municipal and corporate clients. She has been a champion for change throughout her career in the public safety field, including as the Deputy Chief Inspector with the Garda Síochána Inspectorate, which reports to the Minister of the Irish Department of Justice and Equality, and the Chicago Police Department, where she held multiple leadership roles including Chief of the Bureau of Organizational Development. She was an instrumental partner in developing the CPD's response protocol for officer-involved shooting in agreement with the Review Authority. A licensed attorney in the State of Illinois, Debra has a master's degree in homeland security awarded by the Naval Postgraduate School and an undergraduate degree from the University of Illinois. She is a graduate of the FBI National Academy and was a Fulbright Scholar for Law Enforcement working with the University of Manchester in the United Kingdom.



Internal Project Oversight

Robert L. Davis, Senior Vice President and Practice Lead, Law Enforcement Consulting



Robert is a highly regarded and innovative national leader in policing and public safety with extensive experience assessing federal, state and local law enforcement agencies across the U.S. Robert served in a variety of capacities during his 30 years' career with the San Jose Police Department, including as the Chief of Police for seven years. During his time as chief, Robert also served as the President of the Major Cities Chiefs Association, of which Indianapolis is a member. He provided consulting services for the U.S. State Department, traveling on numerous occasions to Central and South America to provide training in community policing methods addressing gang prevention, intervention and suppression. Since retiring from San Jose, Robert has been involved in numerous assessments of police departments across the nation. He also has over 4,000 hours of experience delivering law enforcement training across the country.

Project Manager

Diane Ragans, Vice President, Operations



Diane Ragans brings over three decades of experience to her role as Vice President of Operations at Hillard Heintze. Diane is a highly regarded program manager and criminal intelligence practitioner, adept at conducting assessments, management reviews and audits of high liability areas for public and private sector clients. At Hillard Heintze, Diane has served as a project manager and team member for collaborative reform initiatives in San Francisco and Memphis and risk, threat and vulnerability assessments for a prominent U.S. sports organization with mass-gathering facilities across the country. A 17-year veteran of the Florida Department of Law Enforcement (FDLE), Diane also brought her expertise to the IJIS Institute and Institute for Intergovernmental Research (IIR), the latter for which she served as Vice President.

Subject Matter Experts

Marcia Thompson, Vice President, Law Enforcement Consulting



Marcia K. Thompson is an attorney and law enforcement practitioner with over 20 years working in the criminal justice field. As a Vice President within our Law Enforcement Consulting practice, she provides oversight, management and technical assistance on various law enforcement assessments, trainings and reviews. Marcia has served as a law enforcement administrator within the Department of Safety at the University of Chicago Police Department, where she oversaw professional standards, accreditation, compliance, training, records management, recruitment, field training, in-service training, leadership development, succession planning, community engagement, youth outreach and the community advisory committee in support of the



university's transparency and inclusion initiative. Marcia is a Virginia Supreme Court certified mediator as well as a collaborative problem-solver, change management facilitator, and equal employment opportunity (EEO) and civil rights professional. For many years, Marcia has served as a federal fact finder, EEO counselor, trained EEO investigator and hearing officer, providing neutral hearings and drafting administrative appellate determinations.

Michael Dirden, Esq, Senior Advisor



Michael joined Hillard Heintze following a long and successful career with the Houston Police Department. As the Executive Assistant Chief of Police, Michael provided leadership and oversight for the department's Investigative, Strategic and Field Operations, including accountability for Patrol Operations, Traffic Enforcement, the Mental Health Division, Apartment Enforcement and Differential Police.

Chad M. McGinty, Senior Director



Chad brings nearly three decades of law enforcement, public safety, emergency preparedness and security leadership experience to his role as Senior Director at Hillard Heintze. Chad served in the Ohio State Highway Patrol for nearly 28 years, starting as a Trooper in 1989 and later serving as Sergeant, Lieutenant and Captain before joining the Senior Staff as Major, Commander of Field Operations in 2014. He concluded his tenure by coordinating and leading the crowd control/field force response for the 2016 Republican National Convention in Cleveland, Ohio. Chad implemented a sophisticated staging and response for 1,400 field force officers.

Mark Giuffre, CFE, CAMS, CPP, Senior Director



With 30 years of experience serving in the U.S. Drug Enforcement Administration (DEA), Mark is a globally recognized expert in narcotics investigations, interdiction, border security, transnational crime groups and synthetic opioids. He has developed and provided training programs and instruction to federal, state, local, tribal and foreign law enforcement officials. In addition, he is trained, experienced and certified in financial, fraud and asset forfeiture investigations. Mark retired as an Assistant Special Agent in Charge of the DEA Chicago Office where he was responsible for narcotics investigations, money laundering investigations, intelligence and enforcement in five Midwestern states. Earlier in his career, Mark was stationed at the American Embassy in Bangkok, Thailand for seven years, with travel and assignments to 37 other nations.



Carl J. Dobrich, Senior Director



With over 30 years of experience and expertise in combating organized criminal enterprises, leading major homicide investigations and serving as a public safety administrator, Carl has a proven track record of delivering professional law enforcement services to government partners, as well as the private sector. Carl had a 25-year career in the Illinois State Police (ISP) culminating in serving as the Captain – Zone Commander, where he managed over 80 investigators and was responsible for state police investigations across nine counties. As part of a special assignment, Carl spent nearly two years as a Special Agent for the Federal Bureau of Investigation in Carbondale, Illinois where he performed the duties of a federal task force officer focusing on dismantling organized criminal enterprises under the investigation of the ISP and the FBI.

Wes Stought, Associate Director



Wes brings to Hillard Heintze's private clients more than two decades of strategic leadership, security and project management experience. Before joining Hillard Heintze and supporting the firm's private clients on matters ranging from residential security to cyber and information security best practices, Wes served in the Ohio State Highway Patrol for more than 20 years. In this role, he rose in the ranks to sergeant, serving as an assistance post commander at three different post assignments before transferring to the training academy. Wes served as an instructor and a course director in multiple training disciplines, training several hundred officers from agencies across Ohio and neighboring states.

Robert Boehmer, Esq., Vice President



Robert is an experienced facilitator, trainer and public speaker, with expertise in collaborative problem solving, community policing, partnership development and information sharing. For the past several years, he has been facilitating sessions for the Department of Homeland Security's Building Communities of Trust Initiative, focusing on developing trust among law enforcement, fusion centers and the communities they serve. As a Vice President in the Law Enforcement Consulting practice at Hillard Heintze, Robert manages complex law enforcement assessments and helps police agencies transform their organizations and adopt national best practices and industry standards central to improving accountability, transparency and community trust.