

April 9, 2015

President's Task Force on 21st Century Policing  
Office of Community Oriented Policing Services  
U.S. Department of Justice  
145 N Street, N.E. 11th Floor  
Washington, DC 20530  
[Comment@taskforceonpolicing.us](mailto:Comment@taskforceonpolicing.us)

Submitted via e-mail

**Re: Statement in Response to White House Interim Report on 21<sup>st</sup> Century Policing**

Dear Administration Officials:

On behalf of the undersigned organizations, representing faith leaders, criminal justice reform groups, disability rights and civil and human rights advocates, we appreciate this opportunity to submit written comments including proposed recommendations in response to the interim report by the President's Taskforce on 21<sup>st</sup> Century Policing.

The interim report provides important suggestions on how to improve policing across the country, with valuable appropriate recommendations around police force diversity, safety and wellness, and technology. However, there are other issues not sufficiently addressed in the report, which we highlight below. It is our hope that the Task Force will consider these issues and incorporate them into the final report. In order to have truly safe and secure communities in America, we must reform current police practices and develop comprehensive measures to improve law enforcement accountability, provide clear directives for those entities receiving federal dollars, and provide defined goals of the final report.

As the Task Force issues its final report to the President, we would like for you to consider adding the following recommendations to the final report.

***1. Ensuring Accountability***

Police departments are funded with taxpayer dollars and are accountable to the public. Enforceable accountability measures with a proven track record should be established that ensure impartiality in instances where police brutality, discriminatory profiling, and/or improper use of force are in question.

***We urge the Task Force to recommend the implementation of effective independent review boards broadly representative of the community, not just municipal interests.*** The actions, investigations, and publication of all relevant information, evidence, and policy recommendations of these review boards will be transparent and enforceable. These boards should have substantial authority, which could include subpoena power and independent disciplinary authority. These boards should also ensure that data and summary information are properly collected and analyzed and made publicly available on particular incidents, progress,

and trends that relate to suspected policy brutality and racial profiling over the years for the department.

## ***2. Implementing Success Oriented Funding***

Funding can be a powerful motivator in shifting behavior, but it can also serve as a subtle measure of direction and provide accountability. We believe federal dollars should be used to fund what we know works in criminal justice, and that the dollars expended should be focused on the twin goals of reducing crime and reducing unnecessary incarceration. Recommendation 2.9 in the report directs law enforcement agencies and municipalities to “refrain from practices requiring officers to issue a predetermined number of tickets, citations, arrests, or summonses, or to initiate investigative contacts with citizens for reasons not directly related to improving public safety, such as generating revenue.” This recommendation gets to the core issue of removing perverse incentives in policing practices and policies. We believe this issue should be further investigated and addressed by the Task Force in the final report.

***We urge the Task Force to recommend implementing Success-Oriented Funding into federal law enforcement grants.*** The federal government sends more than \$4 billion in grants to state and local governments, largely for law enforcement purposes. These grants have explicit or implicit success measures that encourage certain policies. We believe that federal funds should be tied to clear outcomes, ensuring accountability and modern criminal justice goals. The federal government can play a large role working with local police to shift policing practices toward modern practices.

## ***3. Demilitarizing Local Law Enforcement Entities***

While emergencies and terrorism are real concerns for our communities, on a day to day basis our local police departments should not be thought of or seen as an occupying force in our neighborhoods. While the report specifically addressed militarized policing in the context of mass demonstrations, departments should not customarily use military weaponry in their day to day activities. Both the federal government and local departments should closely examine the need for military equipment into our local police departments, as such equipment can result in the use of unnecessary force that compromises public safety.

***We urge the Task Force to recommend that local law enforcement only use military weaponry in extreme and rare circumstances.*** In addition, those using such weaponry must have obtained the proper training before access to such goods is made available.

We believe the recommendations outlined above will help improve relationships between state and local law enforcement and the communities they serve. In an effort to continue working together, we would like to request a follow up meeting to discuss some of the items discussed in the letter. If you have any questions or concerns, please feel free to contact Danyelle Solomon, Counsel, Brennan Center for Justice at NYU School of Law, Washington Office at [danyelle.solomon@nyu.edu](mailto:danyelle.solomon@nyu.edu) or 202-249-7197 or Sakira Cook, Counsel, The Leadership Conference on Civil and Human Rights at [cook@civilrights.org](mailto:cook@civilrights.org) or 202-263-2894.

Sincerely,

AAPD (American Association of People with Disabilities)

ACLU

Brennan Center for Justice

Church of Scientology National Affairs Office

Code Pink

Disciples Justice Action Network

Drug Policy Alliance

Institute of the Black World Police and Accountability Taskforce

Leadership Conference on Civil and Human Rights

NAACP

NAACP LDF

National LGBTQ Taskforce

National Association of Social Workers

Peace Alliance and Student Peace Alliance

Prison Policy Initiative

TASH: Equity, Opportunity, and Inclusion for People with Disabilities

T'ruah: The Rabbinic Call for Human Rights

United Church of Christ, Justice, and Witness Ministries