

FINAL REPORT OF THE COMMISSION

Name of Review Committee	BIAS-BASED POLICING REVIEW COMMITTEE
Chairperson(s) of Review Committee	MARVIN BOYER
Members of Review Committee	DENISE ASHE, KEIR BRADFORD-GREY, ESQ., Dr. A. SURESH CANAGARAJAH, Ph.D., and BRENDA TATE
Non-Member Advisors	Commission Chairperson SHA BROWN, OSIG Senior Special Investigator TIFFANY WELCOME, and Vice-Chairperson ELIZABETH C. PITTINGER
Ex-officio Member	ANGELA FITTERER*
Date Review Started	08/09/2021
Report Number	21-0010-P
Date of Report	10/28/2022

* NOTE: Appointment of an Ex-officio (or non-voting) Member to all Review Committees is required by Article 8 (Review Process), Section 8.2 (Commission Sub-committees and Review Committees) of the Commission's Bylaws; however, the Ex-officio Member does not vote on any of the content contained in this report.

TYPE OF COMMITTEE REVIEW

Name of Covered Agency	PENNSYLVANIA STATE POLICE
Nature of Completed Internal Investigative Findings Under Review (i.e., Police-Involved Shooting, Lower-Level Use of Force, Bias-based Policing)	BIAS-BASED POLICING DURING TRAFFIC STOP

BACKGROUND

Incident Date	January 14, 2019
Troop Jurisdiction of Incident	Troop F (Cameron, Potter, Tioga, Clinton, Lycoming, Union, Montour, Snyder, Northumberland)
Criminal Disposition	Not Applicable
Agency Administrative Disposition	Unfounded – Troop Commander (Troop F) - (May 7, 2019)

SCOPE AND METHODOLOGY OF REVIEW

Under Executive Order 2020-04, as amended, the Pennsylvania State Law Enforcement Citizen Advisory Commission (Commission) is required to review a Covered Agency's completed internal investigations concerning allegations of racial or ethnic discrimination and other bias-based policing or external complaints of bias-based policing during interactions with law enforcement personnel to determine the following:

1. Whether the completed internal investigation was:
 - prompt;
 - fair;
 - impartial;
 - complete; and
 - performed in a manner consistent with applicable policies.
2. Whether the internal adjudicatory findings and discipline (if any) were reasonable under standard law enforcement protocol; and
3. Whether there is a perceived policy or training deficiency.

Under the methodology contemplated by Executive Order 2020-04, as amended, a Covered Agency is required to provide a Comprehensive Written Summary and an Oral Presentation of its completed internal investigation that shall include a description and relevant dates of all investigative activities along with a summary of all facts as determined by the investigation, and criminal and administrative adjudications.

In performing its review of the matter currently under consideration, the Commission's Bias-Based Policing Review Committee (Review Committee) used the following methodology:

1. Reviewed how the Covered Agency's completed internal investigation was conducted when compared to internal policy and relevant collective bargaining agreements to determine whether the investigation was conducted in a prompt and fair manner.
2. Reviewed internal relevant policies designed to safeguard fairness and impartiality to ensure that the Covered Agency's completed internal investigation was conducted in accordance with said policies and determine whether any conflict of interest exists based on all known information.
3. Reviewed the Covered Agency's completed internal investigation to ensure investigators collected all relevant facts reasonably obtainable and conducted all relevant interviews.
4. Reviewed the Covered Agency's adjudication report to ensure all relevant facts were considered, including all known actions by the law enforcement officer(s), to determine whether the adjudicator's decision was reasonable and based on a totality of the circumstances.
5. Compared the discipline issued (if any) with past disciplinary precedent to confirm that the discipline (if any) was reasonable and consistent with the Covered Agency's just cause standard, rules and regulations, collective bargaining agreements, and/or grievance and arbitration decisions.
6. Compared facts and circumstances described in the Covered Agency's completed internal investigation with relevant internal policies and training along with best practice guidelines (i.e., Final Report of *"The President's Task Force on 21st Century Policing"*) to determine if any policy or training deficiencies exist. Where deficiencies are identified, make recommendations for corrective action(s).

RELEVANT POLICIES AND CRITERIA EXAMINED

1. Collective Bargaining Agreement between the Commonwealth of Pennsylvania and the Pennsylvania State Troopers Association (effective dates July 1, 2017 through June 30, 2020);
2. United States Department of Justice's (US DOJ) Standards for Internal Affairs (2005);
3. PSP Policy No. FR 1-1 (General Requirements);
4. PSP Policy No. FR 1-2 (Duty Requirements);
5. PSP Policy No. FR 9-1 (Use of Force);
6. PSP Policy No. AR 4-6 (Rules of Conduct for Employees);
7. PSP Policy No. AR 4-25 (Internal Investigations);
8. PSP Policy No. AR 4-26 (Discrimination, Discriminatory Harassment, Sexual Impropriety, and Retaliation);
9. PSP Policy No. AR 4-37 (Bias-Based Profiling Review);
10. PSP Policy No. FR 6-7 (Uniform Traffic Law Enforcement); and
11. PSP Policy No. FR 6-8 (Traffic Law Violation Stops).

COMMISSION'S FINAL DETERMINATIONS, FINDINGS, AND CONCLUSIONS

Pursuant to Executive Order 2020-04, as amended, the Commission completed a comprehensive review of **Internal Case No. 21-0010-P** in accordance with Article 8 (Review Process) of the Commission's Bylaws and adopts such Findings and Conclusions as follows:

The Commission finds that the Pennsylvania State Police's (PSP) completed internal investigation was prompt, fair, complete, and the internal adjudicatory findings were reasonable under standard law enforcement protocol. The Commission corroborated these determinations by examining PSP's investigative and adjudication reports, relevant interviews, and information provided by PSP during its Oral Presentation.

Regarding impartiality, the Commission expresses concern that it is unable to determine if any conflict of interest exists among the parties involved in the investigation with the limited information provided. Specifically, the Commission does not have access to the names of any party because this information is protected as Personally Identifiable Information (PII) under Executive Order 2020-04, as amended. Notwithstanding this limitation, the Commission determines that PSP's completed internal investigation was impartial based on the limited information available to it.

Regarding promptness, fairness, impartiality, completeness, and reasonableness, the Commission also finds that PSP's completed internal investigation is consistent with PSP internal policy, the relevant collective bargaining agreement, and guidelines established by the US DOJ's published standards concerning internal affairs investigations.

Additionally, PSP provided the Commission with documentation to form a sufficient understanding of the underlying facts concerning the incident under review to identify any potential policy or training deficiencies as required by Executive Order 2020-04, as amended. Regarding any potential policy or training deficiencies, the Commission finds the following:

Finding No. 1 – Use of Force (Less than Lethal Force Determinations)

During its review, the Commission expressed concerns about the physical contact between the involved Trooper and the vehicle's driver. Specifically, the involved Trooper "chest bumped" the driver causing him to move backward several feet. Consequently, the Commission sought to determine whether this action was permissible under PSP policy and if there were specific training guidelines regarding "chest bumping."

Concerning PSP's policy or training on "chest bumping," this type of physical contact is considered force and PSP's guidelines regarding the permissible use of force are contained within PSP's Policy No. FR 9-1 (Use of Force). Specifically,

the use of “less than lethal force” is defined as “force which, under the circumstances [it is] applied, is neither calculated, likely, or intended to cause death or serious bodily injury. This includes, but is not limited to, the use of a less than lethal weapons, physical strikes, kicks, and *other physical force*” [emphasis added]. On the use of force array, “other physical force” is considered “mechanical” which falls between OC Spray/Pressure Point Control/Conduct Electrical Weapon (drive stun) and Impact Weapons (baton). Generally, this type of force is also used to gain a subject’s compliance. Although the type of force used during the incident here is contemplated by PSP’s policy under “other physical force,” the Commission could not identify any training technique, compliance hold, escort position, or defensive tactic using the “chest bump” as a recognized technique or tactic taught to Troopers or recommended as a best practice.

Also, PSP’s use of force policy (in effect at the time and published 9/5/2018) permits any type of force to be used in only five limited circumstances:

1. when a Trooper reasonably believes force is necessary to defend themselves or another while making an arrest;
2. when a Trooper reasonably believes that force is immediately necessary while protecting themselves or another from bodily injury from the unlawful force of another;
3. when a Trooper reasonably believes force is necessary to prevent an escape and or defending themselves while preventing an escape;
4. when a Trooper reasonably believes force is necessary to prevent another person from committing suicide or inflicting serious bodily injury upon themselves; or
5. when a Trooper reasonably believes force is necessary to prevent another from committing or consummating the commission of a crime involving, or threatening, bodily injury, damage to or loss of property, or a breach of the peace.

Here, the driver was known to the involved Trooper from previous traffic stops that resulted in the seizure of contraband. At the time of this use of force, Troopers reported that the driver and passenger were argumentative and refused verbal commands to move away from the vehicle to facilitate a canine sniff search of the vehicle’s exterior. Additionally, in PSP’s comprehensive summary of its investigation, Troopers expressed safety concerns including the driver’s refusal to search his outer clothing for weapons (Stop and Frisk) after being ordered to exit his vehicle, along the roadside, given the proximity of highway traffic.

Based on its review, and despite the involved Trooper’s observations and concerns, the Commission finds that none of the five circumstances permitting the Trooper to “chest bump” the vehicle’s driver was apparent in this case. For example, the adjudicator’s evaluation of the incident did not include an explanation of which of the five limited circumstances (allowing the use of less than lethal force) was used in his or her determination that the “chest bump” was justified and the citizen’s complaint of bias was unfounded. Although the driver and PSP describe the physical contact and incident differently, no party denies that force was used.

However, the Commission notes that law enforcement officers generally possess wide latitude when effectuating a traffic stop. For example, the United States Supreme Court opined that minimizing the risk of harm to police officers performing their duties is a government interest of great importance.¹ And the risk of harm to police “is minimized if [officers] routinely exercise “unquestioned command” over situations such as a stopped vehicle.² Further, both the United States Supreme Court and Pennsylvania courts have held that police officers may order both the driver and any passengers out of a vehicle during a traffic stop as a precautionary measure and the officer need not have any reasonable suspicion of a safety risk.³ Additionally, it is reasonable for vehicle drivers and passengers “to expect that a police officer will not let

¹ See *Michigan v. Summers*, 452 U.S. 692, 702 (1981).

² See *Id.* at 702-703; and see *Arizona v. Johnson*, 555 U.S. 323, 330 (2009).

³ See e.g., *Brendlin v. California*, 551 U.S. 249, 258 (2007); *Commonwealth v. Adams*, 205 A.3d 1195, 1201, (Pa. 2019); *Commonwealth v. Elliot*, 546 A.2d 654, 659-660 (Pa. Super. Ct. 1988); and *Commonwealth v. Palmer*, 145 A.3d 170, 173 (Pa. Super. Ct. 2016) (recognizing it is well settled Pennsylvania law that an officer’s right to order the occupants out of the car during a traffic stop is absolute to ensure his own safety).

people move around in ways that could jeopardize [the officer's] safety" during an investigative traffic stop.⁴ In carrying out their "authority and duty to control [a] vehicle and its occupants," police officers may "use a reasonable amount of force" in effectuating a lawful stop.⁵ Accordingly, various federal and state courts have held that the use of less lethal force during traffic enforcement activity to force compliance with an officer's verbal commands is generally considered reasonable.

With the above context, the Commission recognizes that there are circumstances where less than lethal force may be necessary outside of the five limited circumstances permitted by PSP's use of force policy. For example, less than lethal force may be appropriately used when engaged in civil enforcement activities like transporting truants or juvenile runaways, or when engaged in other law enforcement activities like transporting subjects under arrest or during investigative detentions involving traffic stops, or for officer safety, etc. In its **Final Report for Internal Case No. 21-0001-P (dated December 10, 2021)**, the Commission previously recognized this policy deficiency and recommended adding language to PSP's relevant policies creating the permissible use of less than lethal force for legitimate law or civil enforcement purposes. Similarly, it may be necessary to consider whether force is permitted during investigative detentions or, as in this case, "to create tactical distancing" (for officer safety) during the search of a vehicle. In response to the Commission's **Final Report for Internal Case No. 21-0001-P (dated December 10, 2021)**, PSP agreed to update its relevant policies for clarity but has not yet implemented this recommendation or improved the guidance regarding the permissible circumstances covering the use of less than lethal force. Accordingly, the Commission finds that the previously identified policy deficiency remains.

Finding No. 2 – Bias-Based Policing Determinations and Related Adjudications

In completing this review, the Commission sought to evaluate and assess PSP's policy concerning bias-based profiling and policing. PSP defines "Bias-Based Profiling" as "[t]he detention, interdiction, or other disparate treatment of any person on the basis of their racial or ethnic status rather than on the basis of reasonable suspicion." When determining the reasonableness of PSP's adjudicatory findings, the Commission assessed if PSP's adjudicator appropriately applied its bias-based policing policy during his or her evaluation of the facts of their internal investigation under a totality of the circumstances. This would include determining if the involved Trooper made decisions and or took enforcement actions based on the driver's and or passenger's race or ethnic status. In making his or her assessment in this case, the adjudicator should reasonably consider whether the involved Trooper used race or ethnic status in their decision to: (1) initiate the traffic stop; (2) extend the investigative detention of the driver and or passenger; (3) frisk the vehicle's occupants; and or (4) search the vehicle.

Here, the adjudicator thoroughly examined the Trooper's decision to stop the vehicle and the Commission concurs with the adjudicator's assessment that the initial traffic stop was appropriately based on probable cause, i.e., traffic violations. The Commission further concurs that the vehicle's window tinting could have made it difficult to determine the vehicle occupants' race or ethnic group prior to initiation of the traffic stop. However, the Trooper's decision to extend the traffic stop and initiate an investigative detention, i.e., frisk the vehicle's occupants and conduct a vehicle search, occurred after the involved Trooper was aware of the driver's and passenger's perceived race or ethnic background. Accordingly, the adjudicator should have determined if the citizen's race or ethnic status potentially became or was later a factor in the

⁴ See *Brendlin*, 551 U.S. at 258; but c.f. *Rodriguez v. U.S.*, 575 U.S. 348, 354 (2015) (noting a police officer's authority over a traffic stop ends when the purpose of the stop is, or reasonably should be, complete).

⁵ See *U.S. v. Bonner*, 363 F.3d 213, 217 (3d Cir. 2004) (relying on the standard established in *Graham v. Connor*, 490 U.S. 386 (1989) holding the officer tackling a suspect fleeing from a traffic stop was reasonable); *U.S. v. Mitchell*, 454 F. App'x 39, 41 (3d Cir. 2011) (holding the officer's use of force to remove a vehicle's occupant when the occupant failed to comply with the officer's order was reasonable); *U.S. v. Richardson*, 504 F. App'x 176, 181 (3d Cir. 2012); *U.S. v. Jones*, 506 F. App'x 128, 132-33 (3d Cir. 2012) (holding the officer's draw of his weapon during a traffic stop was reasonable and commensurate with the posed threat because "because officers may apply enough force during a stop to neutralize the situation of potential danger, depending on the peculiarities of the stop . . .") (citing *Graham*, 490 U.S. at 396).

involved Trooper's further decisions and subsequent actions to detain the vehicle's occupants for investigative purposes and or search the vehicle.

In this case, the Commission finds that it appears each enforcement action was based on the Trooper's assessment that reasonable suspicion or probable cause existed to first initiate a traffic stop, then to further detain, and investigate for evidence of a potential crime, and finally to search the vehicle (based on the K-9 positive alert). Based on PSP's policy at that time, the adjudicator would have to determine if the Trooper's decisions and actions were based on racial or ethnic status rather than reasonable suspicion and or probable cause. However, PSP's records did not contain any evidence to support the former. Accordingly, the involved Trooper's reasonable suspicion and or probable cause was appeared apparent during each step of the decision-making process and the adjudicator's decision regarding bias-based profiling (i.e., "Unfounded") is consistent with PSP's policy at that time.

In its **Final Report for Internal Case No. 21-0006-P (dated December 10, 2021)**, the Commission identified several deficiencies within PSP's collective bias-based policing policies and recommended that PSP update its Bias-Based Profiling Review Policy (last updated 2008/2009). The Commission's recommendation sought to better define prohibitions of conduct against all protected classes, and (where feasible) provide examples and descriptions of prohibited acts that constitute or may indicate bias-based policing for more specific guidance. In its response to the Commission's **Final Report for Internal Case No. 21-0006-P (dated December 10, 2021)**, PSP agreed to update its Bias-Based Profiling Review Policy and other related policies to better define prohibitions of conduct against all protected classes.

As of the date of this Final Report, PSP has not updated its Bias-Based Profiling Review Policy and adjudicators continue to apply the limited definition of bias-based profiling ("the detention, interdiction, or other disparate treatment of any person on the basis of their racial or ethnic status rather than on the basis of reasonable suspicion"). The Commission finds that the previously identified deficiency and PSP's current policy still does not consider that: (1) bias-based policing and racial or ethnic discrimination can occur concurrently while also possessing reasonable suspicion or probable cause; and (2) the existence of reasonable suspicion or probable cause should not cancel or limit an adjudicator's thorough review of all facts to determine if Troopers used bias during any enforcement activity.

**Finding No. 3 –
Mandated Annual Bias-Based Policing or Implicit Bias Training**

The United States Department of Justice (US DOJ) publishes best practice guidelines for law enforcement agencies regarding a wide range of topics concerning enforcement activity. For example, Recommendation No. 5.9 of the US DOJ's Final Report of the President's Task Force on 21st Century Policing (2015) states, "Police Officer's Standards and Training should ensure both basic recruit and in-service training incorporates content around recognizing and confronting implicit bias and cultural responsiveness." Further, Action Item No. 5.9.1 of the same publication states, "Law Enforcement Agencies should implement ongoing, top-down training for all officers in cultural diversity and related topics that can build trust and legitimacy in diverse communities."

The Commission confirmed that PSP does provide implicit bias training for all cadets in its training academy. However, PSP does not include implicit bias or bias-based policing training as an annual in-service training requirement as recommended by the Final Report of the President's Task Force on 21st Century Policing. Consequently, in its **Final Report for Internal Case No. 21-0006-P (dated December 10, 2021)**, the Commission recommended that PSP mandate annual in-service bias-based policing or implicit bias training for all members. In its response to the Commission's Final Report, PSP agreed to review the feasibility of making anti-bias and implicit bias training a mandatory annual in-service training requirement. However, as of the date of this Final Report, the Commission's recommendation has not been implemented.

BASED ON ITS REVIEW, THE COMMISSION FINDS THAT THE COVERED AGENCY'S COMPLETED INTERNAL AGENCY INVESTIGATION WAS –

✓ **Prompt;**

- ✓ **Fair;**
- ✓ **Impartial;**
- ✓ **Complete;**
- ✓ **Performed in Manner Consistent with Applicable Policies; and**
- ✓ **Included Adjudicatory Findings and Discipline (if any) that were Reasonable and Based on Applicable Standards.**

ADDITIONAL FACTORS / NOTES

Not Applicable

FINAL RECOMMENDATION(S) FOR CORRECTIVE ACTION(S)

Recommendation No. 1 – Use of Force (Less than Lethal Force Determinations)

The Pennsylvania State Law Enforcement Citizen Advisory Commission recommends that the Pennsylvania State Police revise and include language within its use of force policy permitting the use of less than lethal proportional force (given the totality of circumstances) to carry out a legitimate law or other civil enforcement activity, including a definition for “legitimate law or enforcement activity” in further support and enhancement of a similar recommendation (see Recommendation No. 1 contained in the Commission’s **Final Report for Internal Case No. 21-0001-P (adopted on December 10, 2021)**).

Recommendation No. 2 – Bias-Based Policing Determinations and Adjudications

The Pennsylvania State Law Enforcement Citizen Advisory Commission recommends that the Pennsylvania State Police update its Bias-Based Profiling Review Policy (last updated 2008/2009) and all relevant employee code of conduct and enforcement-related policies to include, cover, and better define prohibitions of conduct against all protected classes, and (where feasible) provide examples and descriptions of acts that constitute or may indicate bias-based policing. For more specific guidance, see Recommendation No. 2 contained in the Commission’s **Final Report for Internal Case No. 21-0006-P (dated December 10, 2021)**.

Recommendation No. 3 – Mandated Annual Bias-Based Policing or Implicit Bias Training

The Pennsylvania State Law Enforcement Citizen Advisory Commission recommends that the Pennsylvania State Police mandate in-service annual bias-based policing or implicit bias training for all members as previously recommended in the Commission’s **Final Report for Internal Case No. 21-0006-P (dated December 10, 2021)**.

AS ADOPTED AND PRESENTED BY RESOLUTION NO. BBP-1 OF THE BIAS-BASED POLICING REVIEW COMMITTEE (DATED OCTOBER 11, 2022)

AS ORIGINALLY ADOPTED AND RATIFIED BY RESOLUTION NO. 1 OF THE PENNSYLVANIA STATE LAW ENFORCEMENT CITIZEN ADVISORY COMMISSION (DATED OCTOBER 28, 2022)

**SIGNATURE OF THE PENNSYLVANIA STATE LAW ENFORCEMENT CITIZEN ADVISORY COMMISSION'S
CHAIRPERSON:**



Sha S. Brown

(Electronic Signature Authorized)

**SIGNATURE OF THE PENNSYLVANIA STATE LAW ENFORCEMENT CITIZEN ADVISORY COMMISSION'S
SECRETARY:**



Jaimie L. Hicks

(Electronic Signature Authorized)

**RESPONSE BY
COVERED AGENCY
TO
FINAL REPORT OF THE
COMMISSION
INTERNAL CASE NO. 21-0010-P**



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA STATE POLICE
1800 ELMERTON AVENUE
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COLONEL ROBERT EVANCHICK
COMMISSIONER

November 22, 2022

Sha S. Brown, Chairman
Office of State Inspector General
Bureau of Law Enforcement Oversight
Law Enforcement Citizen Advisory Commission
555 Walnut Street
Harrisburg, Pennsylvania 17101

Re: Response to Final Report of the Commission for Report No. 21-0010-P [PSP Case No. [REDACTED]]

Dear Chairman Brown:

This correspondence is the response of the Pennsylvania State Police (PSP) to Pennsylvania State Law Enforcement Citizen Advisory Commission's (Commission) final report and recommendations for Internal Case No. 21-0010-P.

Pursuant to Executive Order 2020-04, as amended, the PSP has reviewed the recommendations contained in the Commission's final report. This written response identifies the recommendations that will be implemented and addresses recommendations that cannot be implemented.

Recommendation No. 1 – Use of Force (Less than Lethal Force Determinations)

As stated in the response to the Commission's Use of Force Review Committee's Final Report for Internal Case No. 21-0001-P (dated December 10, 2021), the Bias-Based Policing Review Committee is reminded that the PSP already incorporates force avoidance de-escalation techniques, which is reenforced through training. Field Regulation (FR) 9-1, Use of Force, 1.07 meets the legal standard under State and Federal law. FR 9-1, 1.07 (A) (1-5) clearly states members may use less-lethal force when "they reasonably believe that such force is necessary [or immediately necessary] ..." As for the recommendation to include a definition of "legitimate law or enforcement activity," the PSP is unaware of an official and/or non-ambiguous definition. FR 9-1, 1.01 does state that "Members and enforcement officers are authorized to use reasonable force, when necessary, in the performance of their duties, after consideration of the totality of the circumstances, to successfully attain lawful objectives." Accordingly, the PSP believes that FR 9-1, as written, currently meets the precepts articulated in this current recommendation.

Recommendation No. 2 – Bias-Based Policing Determinations and Adjudications

The PSP is currently in the process of updating the Bias-Based Profiling Review Regulation, and other regulations to better define prohibitions of conduct against all protected classes. As stated in the response to the Commission's Bias-Based Policing Review Committee's Final Report for Internal Case No. 21-0006-P [PSP Case No. ██████████] (dated December 10, 2021), these prohibitions are already captured in several internal regulations and prohibit any discrimination or harassment against any protected class. Furthermore, the overarching guideline governing PSP member's conduct is the regulation on conduct that is unbecoming. PSP members are currently prohibited from engaging in conduct that could reasonably be expected to destroy public respect for PSP members or confidence in the Department, which would include any bias-based activity against any member of a protected class. While individual regulations may be targeted to prohibit specific types of discrimination, as an agency under the Governor's jurisdiction, PSP members are bound by management directives and policies, which make it clear that discrimination against all protected classes is prohibited.

Recommendation No. 3 – Mandated Annual Bias-Based Policing or Implicit Bias Training

As stated in the response to the Commission's Bias-Based Policing Review Committee's Final Report for Internal Case No. 21-0006-P [PSP Case No. ██████████] (dated December 10, 2021), the PSP currently mandates all members receive anti-bias and implicit bias training starting with Cadets at the Academy. The PSP is currently in the process of formalizing bias-based policing/implicit bias training as a mandatory, annual in-service requirement in our regulations.

The PSP thanks the members of the Commission for their time and dedication to this process and looks forward to continuing our work together.

Sincerely,



Robert Evanchick
Commissioner
Pennsylvania State Police