PARTNERSHIP FOR THE PUBLIC GOOD

This policy brief was drafted by Andrea Ó Súilleabháin, *Deputy Director at Partnership for the Public Good*. It recommends that the Buffalo Police Department expand its community policing efforts through culture change and incentives, a diversified police force, increased training, improved transparency and oversight, more restorative justice and diversion programs, and the use of crime prevention through environmental design.

The brief is based on "Collaboration, Communication, and Community-Building: A New Model of Policing for 21st Century Buffalo," a 2016 PPG report prepared by Sam Magavern, Steve Peraza, Kerry Battenfield, Caryn Blair, Erin Carman, Stephen Hart, Tina Meyers, and Sarah Wooton. It also draws on Open Buffalo's Community Policing Survey data, collected from 2,018 residents of Buffalo in spring 2016.

The research and strategies it sets out inform PPG's work with Open Buffalo's Justice and Opportunity Coalition. This table of community groups and individuals seeks an improved relationship between police and community, based on respect, trust, confidence, oversight, and mutual benefit.

Policy Brief
Better Policing for the City of Buffalo: Toward Community, Transparency, and Justice

Community policing is a philosophy of law enforcement that changes police culture by prioritizing positive interaction between police and the community, and by using problem-solving methods to prevent crime. The Buffalo Police Department (BPD) has taken important steps toward embracing community policing. This brief explores further ways the BPD can build on this momentum to expand community policing in Buffalo.

The Buffalo Police Department faces an imposing array of challenges in serving a city affected by concentrated poverty and racial inequality. Community policing will not, alone, solve these challenges. But the recommendations in this brief provide innovative and proven approaches that can help improve public safety and police-community relations while reducing the stark racial disparities in the criminal justice system.
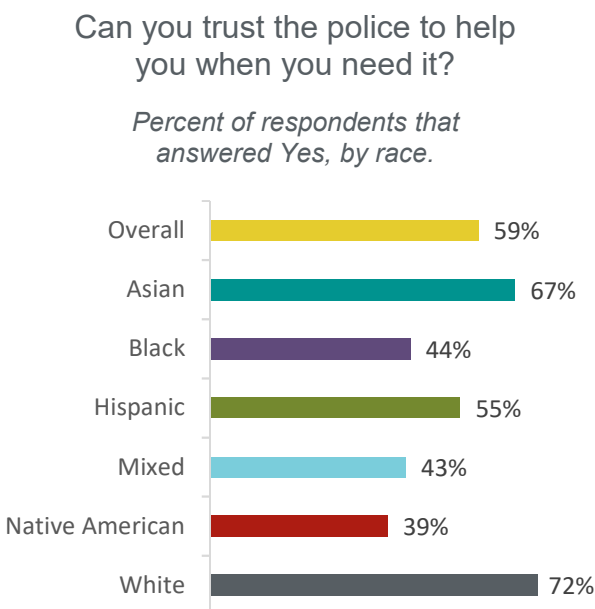
These approaches can make officers' work more effective and rewarding, while increasing the public's trust that the police will protect and serve every resident, without exception. Police officers are safer when they engage with the community and concentrate on cultivating partnerships. They can then leverage their ties to community members to prevent crime, rather than react to it.

Buffalo has many assets to build on as it explores police reform, including a police department that has embraced community policing and instituted several good policies, practices, and collaborations. Still, no plan is in place to achieve many of the recommendations in this brief, which require a systemic set of changes to policy and practice to fully implement community policing in Buffalo. Through the strategies outlined below, the BPD has a unique opportunity to become a national leader in community policing.

The BPD can promote community policing through culture change, incentives, and policies.

Community policing calls on officers to fully engage in the communities they serve. In developing relationships with residents, businesses, and organizations, officers can increase trust in law enforcement. And with the community's help, police can respond to crime more effectively and renew their legitimacy as public servants in the eyes of the people they serve. For communities to remain safe, police must understand the needs of residents and promote the dignity of society's most vulnerable members.[1]

In the City of Buffalo, with a poverty rate more than twice the national average and persistent racial disparities, this increase in trust and understanding is badly needed.[2] According to data in Open Buffalo's Community Policing Survey, only 44 percent of black respondents believe they can trust the police.[3]

Can you trust the police to help you when you need it?

Percent of respondents that answered Yes, by race.

Overall	59%
Asian	67%
Black	44%
Hispanic	55%
Mixed	43%
Native American	39%
White	72%

Trust is low among young people as well: 44 percent of respondents under 18 years old and 56 percent between 18 and 25 believe that they can trust the police.[4]

When community policing is the core principle of a police department, officers are hired, trained, evaluated, and promoted based on community engagement, not just the number of arrests and tickets, or their tactical skills.[5] While the BPD has begun successful community policing initiatives, parts of the department still seem to follow a "zero tolerance" approach that prioritizes large numbers of arrests for low-level offenses. The BPD's Strike Force Unit and Housing Unit generate huge numbers of arrests and citations for minor offenses such as high grass, missing house numbers, or garbage totes left too close to the street.[6]

This aggressive enforcement comes with persistent racial disparities, as demonstrated in recent arrest data. In the City of Buffalo in 2015, there were 259 black people arrested for misdemeanor possession of marijuana compared to 41 white people; in 2016, 232 black people were arrested compared to 28 white people (though national research shows that white people use marijuana at the same rates as people of color).[7]

In particular, the approach of the BPD's Housing Unit has raised many concerns. The president of the Jurisdiction-Wide Resident Council of Buffalo Municipal Housing has expressed concern that many residents have been unlawfully stopped or falsely arrested for trespassing when walking to or from their own apartments. This practice of proactive stops and frequent arrests is out of step with the

Buffalo Municipal Housing Authority's contract with the BPD—which calls for the use of "community policing concepts."

> ### "Cops should be as familiar as mail carriers."
> – Buffalo West Side resident

The BPD, a department with over 850 sworn officers, currently employs 11 sworn officers as community police officers (CPOs). Each of Buffalo's five police districts has two CPOs, and the housing unit has one. CPOs engage the community and build relationships in non-enforcement settings, attending block club meetings and cosponsoring community events. Other officers are not required or incentivized to use these community policing methods, and their daily interactions with citizens are not regularly reviewed. Surprisingly, the BPD does not even conduct annual performance reviews of its officers.

> **All Buffalo police officers should spend time on community policing, and those who do it well should be rewarded.**

- The BPD should require all officers to devote a certain number of hours each week to community policing activities such as doing foot and bike patrols, attending community meetings and events, collaborating on community improvements, and mentoring youth.

- The BPD can create incentives for officers to excel at community policing, such as pay increases, promotional opportunities, and public recognition.

- The BPD's Housing Unit should be converted from a strike-force model to community-policing model and partner with residents.

> **The Buffalo Police Department should conduct annual performance reviews of its officers, and regularly assess their interactions with citizens.**

- Annual performance reviews and regular assessments should recognize and reward community policing activities.

- Performance reviews should include measures of effectiveness in solving problems, fostering relationships with residents and businesses, and partnering with community organizations to address issues in the community.

Buffalo can increase the diversity and cultural competency of its police force.

There is no evidence that police officers are more or less racist than other segments of society. Indeed, racial disparities persist in every part of our society, including employment, housing, and health. But because police officers are involved in situations involving life or death, freedom or imprisonment, and respect or humiliation, the stakes are particularly high. Many respondents in Open Buffalo's Community Policing Survey asked that Buffalo police officers be more sensitive to the communities they serve, especially when policing across racial and cultural

lines. They recommended that the BPD recruit more police of color, so that its officers reflect the communities they patrol. Evidence shows that increasing diversity in the police force can prevent incidents of police misconduct,[8] and is necessary for unbiased training and operations.[9]

Today, the BPD does not demographically reflect the population it serves. Minority groups comprise more than 50 percent of the population in Buffalo, but only 30 percent of the police force.[10] African Americans are 39% of Buffalo's population, but only 18% of the BPD's high-ranking officers. The overrepresentation of whites in the police force may foster racial and ethnic alienation in some Buffalo communities, and increase perceived bias.

To make the police force more diverse, Buffalo has developed three key initiatives: first, to increase the pool of applicants, the BPD lowered the education standard for admission to the police academy;[11] second, the BPD established residency requirements to ensure officers are invested in serving in Buffalo—new recruits must live in Buffalo for at least 90 days before taking the police exam, and remain in Buffalo for 7 years after the time of hire;[12] and third, the BPD added a pre-employment examination on cognitive abilities and personality traits, to select candidates most likely to promote public safety and serve communities as guardians.[13] The Buffalo Police Department 21st Century scholarship program was also launched to recruit from underrepresented communities, including racial minorities, women, and first-generation immigrants, and offered fifty scholarships to Buffalo residents to cover police academic tuition,

books, and uniforms (a total value of $6,800).[14]

> **Diversify the police force, so it better represents the communities it serves.**

- Recruit more police officers from Buffalo's diverse communities, including minorities, women, LGBT individuals, refugees, immigrants, and people with disabilities.

- Repeat and expand the Buffalo Police Department 21st Century scholarship program.

Buffalo has a significant immigrant, refugee, and non-English speaking population, including many recent arrivals from Puerto Rico, Yemen, Burma, Iraq, Nepal, and Somalia, among others. The expansion of Buffalo's immigrant community means that officers must develop the ability to communicate effectively with those who do not speak fluent English.

For example, in recent years, Buffalo's Burmese refugee community was the target of a series of home burglaries. Many of these incidents went unaddressed, because victims with limited English proficiency could not communicate effectively with the police.

In February 2016, following advocacy by refugee leaders, the City announced that the BPD had adopted a language access plan, including the following provisions:[15]

- Giving a "language identification card" to officers for identifying what language an individual speaks, so that the officer

can request help from a qualified BPD member or a professional interpreter;

- Maintaining a list of all BPD qualified bilingual members;
- Specifying that BPD members should not use family members, friends, bystanders, neighbors, or volunteers to interpret except under extreme circumstances;
- Requiring language access training for new recruits and in-service training for BPD members;
- Monitoring, compliance, and data collection and reporting.

Unfortunately, the BPD added qualifying language to many of the policies, with words such as "if possible" and "where practicable." For example, the collection and reporting of LEP data will be done only "if possible."

> **Improve and implement the Buffalo Police Department's Language Access Plan.**

- Revise the BPD's Language Access Plan to include the recommendations of refugee leaders and to remove qualifying language.
- Provide ongoing language access training to officers and evaluate their

> *"Our house was broken into, and many of our belongings stolen. When the police officers came, they couldn't understand us. It made us feel even more unsafe in our new home."*
> – Burmese refugee, Buffalo West Side

performance to ensure successful implementation.

- Hire civilian liaisons and police social workers to aid in language access, cultural competency, mental health response, and other situations.

The BPD can increase and improve its training on diversity and implicit bias, use of force, and community engagement.

The Investigative Post reports that the Buffalo Police Department is lagging behind law enforcement agencies across the nation in training programs.[16] Whereas other law enforcement agencies require that officers receive between eleven and twenty hours of training on firearms and use of force each year, Buffalo police officers receive only two hours of training. These training programs are based in classroom settings, and do not place officers in real-life scenarios to prepare them for the stressful situations they encounter on patrol. In addition, Buffalo police officers do not receive training in de-escalation tactics. The national context makes this quite worrying: over 1,000 people are killed by the police each year in the U.S., compared to less than 10 people per year in countries such as Great Britain, Australia, Germany, and Japan.[17]

In 2014, the Buffalo Common Council changed municipal law to require that Buffalo police officers take part in a minimum of 21 hours of diversity, ethics, and use of force training each year.[18] Ongoing diversity and implicit bias training should be mandated. Research in social psychology has shown that bias allows individuals to make quick generalizations
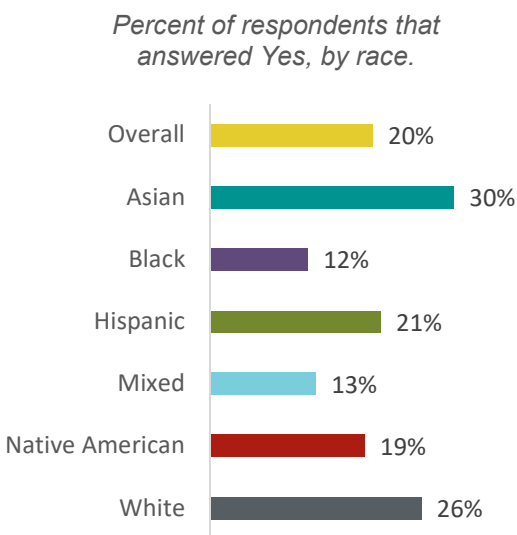
about people and categorize them into groups with similar characteristics.

Race-crime stereotypes and presumptions around 'dangerousness' make implicit bias particularly dangerous in law enforcement. National data shows that blacks are disproportionately likely to be stopped and subjected to the use of force: for example, to be pushed into a wall, pushed to the ground, or threatened with a gun.[19] In Buffalo, the Community Policing Survey data shows that black and Latino respondents were more likely to feel disrespected by police.

In general, do you think that police respect people of color?

Percent of respondents that answered Yes, by race.

Race	Percent
Overall	20%
Asian	30%
Black	12%
Hispanic	21%
Mixed	13%
Native American	19%
White	26%

Researchers have shown that biases are malleable and that police officers can overcome implicit biases by increasing positive contact with diverse communities and individuals who defy stereotypes.[20] Gender bias in policing can also prevent officers from responding effectively to crime and, consequently, delegitimize them in victims' eyes. Like racial bias, gender bias can surface explicitly or implicitly, shaping how police officers

address sexual assaults or domestic violence incidents.

In addition to training, the BPD should encourage the collection and analysis of data related to bias. In Minneapolis, for example, local police agencies are collaborating with social scientists to study implicit bias, procedural justice, and racial reconciliation in relations between police and the community.[21] The BPD should also seek partnerships with national organizations dedicated to the study and implementation of community policing methods—some, like the Center for Policing Equity, conduct free research with interested police departments.[22]

> ***Require implicit bias training for Buffalo police officers, and include members of diverse communities in the process.***

- Require regular implicit bias, cultural competence, and diversity training for all officers, including positive contacts with individuals from various communities as part of the training.

- Offer more training in trauma, adolescent development, and tactical restraint/de-escalation strategies.

- Work with local and national agencies to develop a system of data collection and analysis to monitor bias in police activities.

In 2015, all officers were required to attend a four-hour community policing training.[23] Currently, one preliminary community policing training takes place in the Erie County Police Academy. This training is led

by Deputy Commissioner Kimberly Beaty. Captain Steven Nichols conducts another two-hour community policing training during the Buffalo police orientation—with input from representatives of community groups, including members of immigrant and refugee populations. The BPD-specific training explains the role of the community police officer and how to address non-criminal neighbor disputes, problem properties, and eviction processes. Additionally, new recruits are taught to partner with community groups and neighborhood watches. This additional training is welcome, but it needs to be complemented with incentives and requirements that encourage officers to use community policing in their daily work.

> ***Train officers to interact effectively with allies and assets in the community.***

- Incorporate more community policing into training for new recruits and in-service police officers.

The BPD can improve transparency, information-sharing, and oversight.

By documenting police stops and use of force, the Buffalo Police Department can make criminal justice information more accessible for citizens. The public should have easy access to police records that document investigatory stops, frisks, and arrests. Everyday citizens should also be able to find and search a police database with information detailing any fines, charges, or other penalties they face. The law enforcement section of the City's new Open Data Buffalo Portal, to be launched in September 2017, could serve as a useful platform to make this data accessible.

"To them, you are criminal until proven innocent."
– Buffalo East Side resident
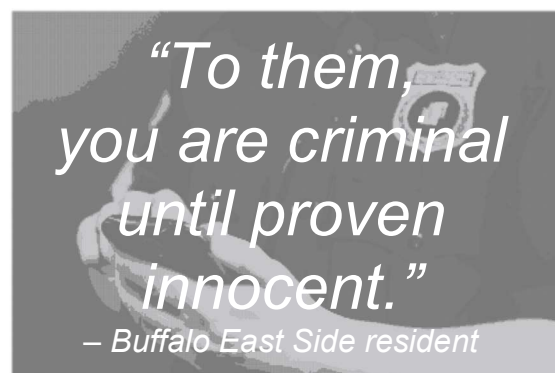
Documenting stops as they happen is critical for this type of data collection. The New York Police Department recently implemented a practice of issuing receipts to all individuals stopped, but not arrested, by police. The receipts explain police policy on stops, and include the officer's name, badge number, and justification for the stop. Illinois also recently enacted legislation to require officers to provide a "stop receipt," including the officer's name, badge number, and a reason for the stop.[24] The BPD should document and offer receipts for all stops, which would enable study of the effectiveness of the stops and their racial impacts.

> ***The BPD should collect and analyze data to monitor bias in policing, and make it publicly available.***

- Develop a procedure for recording all police stops and issuing receipts to those stopped, and create a database where the public can access these records.

- Work with local and national agencies to develop a system of data collection and analysis to monitor bias in police activities.

- Publish the Buffalo Police Department's policies and more department data on the BPD website to facilitate greater transparency, and ensure that all the information and reports required by the City Charter are presented.

When it comes to police oversight, Buffalo has an asset that many cities do not: a commission with the authority to review, monitor, and report on the relationship between the Buffalo police and community members. This means assessing the BPD's community relations training, its protocols for resolving civilian complaints against officers, and its internal investigations of police misconduct.

According to the City Charter, the Commission on Citizen Rights and Community Relations (CCRCR) should serve as an advocate for citizens with grievances against the police. The CCRCR has the power to hold public and private hearings, take testimony under oath, and to issue subpoenas. Unfortunately, the CCRCR has not released a public report since 2008.

According to the Charter, it is required to issue an annual report on "the state of the police department's initial and ongoing training programs in community relations and respect for citizens' rights and standards and procedures for investigating and acting upon complaints of police misconduct."[25]

The Commission on Citizen Rights and Community Relations (CCRCR) should review all police misconduct cases, and report to the public.

- Require the CCRCR to review all Internal Affairs cases to look for systemic problems, repeat offenders, and unfair results.

- Require the CCRCR to release reports of oversight to the public and to host community meetings to present their findings.

Accreditation is another form of oversight required by the City Charter, but not yet realized. The Charter requires the BPD to obtain accreditation by an agency recognized for "certifying compliance with generally accepted law enforcement training, policies and procedures and other relevant techniques and methods of operation."[26]

Of the ten largest cities in New York State, seven police departments are accredited through the New York State Law Enforcement Accreditation Program, a free program that aims to increase accountability, officer understanding of policies, government funding, and community support while decreasing liability in civil lawsuits. In July 2017, the BPD announced that it would begin the process to become accredited.[27]

The BPD should obtain accreditation, as required by the City Charter.

Restorative justice and diversion programs can reduce arrests and racial disparities, and increase public safety.

In many cities, community policing has taken a backseat to the war on drugs. Since the 1980s, new laws and policies led to a massive increase in the number of arrests and convictions for drug offenses, and tended to target low-level offenses in non-white, poor communities. At the same time, the public health system has failed to provide adequate services for people with mental illness or drug use. As a result, police increasingly respond to calls related to mental health or substance use, rather than criminal intent or activity.

Officers cannot solve all the underlying problems in society, but they should have protocols for handling individuals with diverse needs. Officers should be able to determine when the safety of the individual and the community is better served by diversionary methods like referrals to human service providers or restorative justice than by punitive justice. Alternatives to arrest can ensure the rights and safety of vulnerable populations, help individuals get access to needed services, improve equity and reduce recidivism.[28]

Law Enforcement Assisted Diversion (LEAD) is a program that improves public safety and public health through a partnership between police and community service providers. In a LEAD program, when an individual comes into contact with law enforcement due to an incident related to substance use, mental health, or poverty, the officer can choose to divert them into an intensive case management system. LEAD participants

were 58% less likely to be arrested after enrollment in the LEAD program in Seattle, compared to those who went through the criminal justice system as usual.[29]

In April 2016, the City of Albany launched its own LEAD program, and has seen similar success with 40 diversions in its first year. A committee of community groups and service providers in Buffalo is working with Albany's LEAD team to begin developing a similar program for Buffalo.

> **_Bring Law Enforcement Assisted Diversion (LEAD) to Buffalo._**

- The BPD can support local efforts to create a Law Enforcement Assisted Diversion (LEAD) program for incidents driven by mental health, substance use, or poverty.

- Develop standards by which BPD officers can determine when a suspect should be referred to a social service agency rather than arrested.

Not all diverted cases need a formal, intensive program like LEAD. Certain neighbor disputes and minor offenses, for example, should be referred to neighborhood peace hubs rather than addressed through formal citations. Peace hubs in Buffalo are a result of restorative justice: a philosophy that aims to repair the harm that criminal offenders do rather than simply punish them. In Buffalo, community leaders have embraced restorative justice to resolve conflicts in local schools and to restore peace in troubled neighborhoods.

In 2014-2015, for example, the Buffalo Public School system incorporated

restorative justice in its code of conduct, hoping to prevent suspension and to improve the sense of community in each school.[30]

> *Whenever possible, Buffalo police should refer neighborhood disputes to peace hubs and restorative justice programs.*

- BPD officers should be trained in restorative justice practices and develop strong relationships with Buffalo's restorative justice coalitions.

In many situations, police officers have the discretion to address low-level misdemeanors and petty offenses with alternatives to arrest. One recommendation that emerged from a federal investigation into policing in Ferguson, Missouri was the use of "fix-it" tickets to reduce the arrests and fines related to "correctable violations." The Ferguson Police Department has begun to issue correctable violation tickets for "vehicular equipment violations, traffic violations involving the failure to provide proof of driver's license, any housing, zoning, or animal licensing violations (including occupancy and maintenance violations), and additional violations as the city deems appropriate."[31] If the resident can provide proof of correction of the violation within a reasonable period of time, he or she can avoid a citation altogether.

Buffalo should use such alternatives to arrest, to allow low-level offenders to avoid citations if they are willing to remedy the violation within a reasonable period of time.

> *Buffalo police should use fix-it tickets for minor offenses, instead of arrests and fines.*

- Utilize fix-it tickets for minor, correctable offenses.

- Carefully monitor practices regarding violations and minor crimes to ensure that a desire for fine revenue does not distort policing and unduly harm people with low incomes.

Use crime prevention through environmental design to reduce crime and improve communities.

Crime prevention through environmental design can offer a more positive version of "broken windows" policing. If a neighborhood suffers from broken windows, the most effective response may be to hire neighborhood residents to fix the broken windows rather than to arrest them for minor "quality of life" offenses. Making large numbers of minor arrests can have negative consequences, such as interrupting the income of the arrestees, lessening their employability, increasing police-community tensions. In contrast, hiring residents to fix up their neighborhoods can have many positive consequences, such as adding income, increasing employability, reducing police-community tensions, and making the neighborhood a better place to live.

This strategy, sometimes called "building our way out of crime," has been successful in many cities.[32] The police in Providence, Rhode Island dramatically reduced crime in one of the city's most challenged areas by working closely with non-profit housing

developers to make physical improvements to parks, streets, and buildings. In Minneapolis, this strategy included replacing a gas station/convenience store that accounted for 517 police calls in a year with a bakery that provided jobs for local residents while also adding many more "eyes on the street" to reduce crime.

The BPD has also implemented crime prevention through environmental design at a strip mall on East Delavan and Cortland Avenue on the City's east side, making changes to the streetscape, trimming trees, moving a bus stop, adding new curb structures, and re-routing the entrance through the parking lot, which changed the flow of traffic through the area. This initiative on East Delavan and Cortland was effective in reducing the prevalence of crime in the area and improving business relations.[33]

Do you think your neighborhood works well with the police?

Percent of respondents that answered Yes, by race.

Race	Percent
Overall	43%
Asian	31%
Black	30%
Hispanic	39%
Mixed	25%
Native American	28%
White	57%
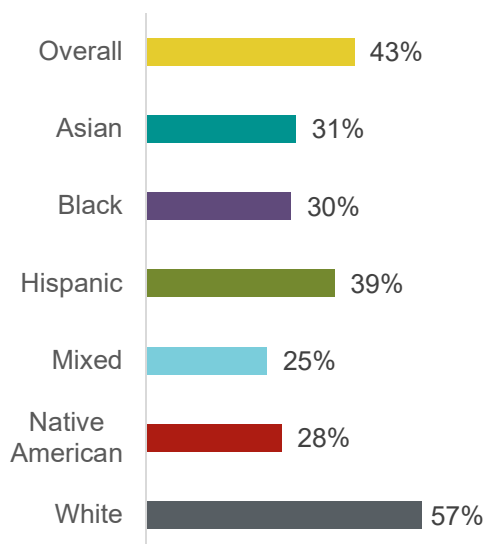
The BPD should expand its use of environmental design, especially in BMHA developments. Data from Open Buffalo's Community Policing Survey revealed disparities in whether residents think their neighborhood works well with police. BPD could combine these improvement projects with community engagement and, in the long term, diversity recruitment.

Law enforcement agencies can prevent crime among young people by creating youth development programs that offer work experience and employment. BPD resources could be used to support adolescents through a summer jobs program emphasizing community policing and crime prevention through environmental design. This could also serve as an introduction to a future career in law enforcement, and improve the public perception of the police's relationships with and respect for young people.

Further, it could be linked to Mayor Brown's Summer Internship Program in Buffalo, which employs nearly 1,500 youth for six weeks at $8.75 per hour.[34] The City of Buffalo and the BPD should work together to expand the Mayor's Summer Internship program by hiring youth to work on crime prevention through environmental design projects in their neighborhoods.

> ***Increase crime prevention through environmental design in Buffalo.***

- Work with community groups and, where possible, hire local residents and young people to improve public safety through physical improvements to neighborhoods.

[1] President's Task Force on 21st Century Policing, Final Report of the President's Task Force on 21st Century Policing (Washington, D.C.: Office of Community-Oriented Policing Service, 2015), 49.

[2] Partnership for the Public Good, "Collaboration, Communication, and Community-Building: A New Model of Policing for 21st Century Buffalo," November 2016, 9. Available at: https://ppgbuffalo.org/files/documents/criminal-justice/policing/criminaljustice-_collaboration__communucation_and_community-building.pdf.

[3] Ibid, 15-16.

[4] Ibid.

[5] President's Task Force on 21st Century Policing, Final Report of the President's Task Force on 21st Century Policing (Washington, D.C.: Office of Community-Oriented Policing Service, 2015).

[6] Aaron Lowinger and Justin Sondel, "Checkpoint: Buffalo Police Practices Questioned," The Public, 13 July 2016, and Aaron Lowinger, "Broadway-Fillmore Sees Raft of Code Violations," The Public, August 10, 2016.

[7] Data obtained from the New York State Division of Criminal Justice Services (DCJS): Arrests for PL 221.10, 2012-2017, by Race/Ethnicity.

[8] For example, a higher percentage of female officers has been associated with fewer civilian complaints of excessive use of force. Liqun Cao, Curbing Police Brutality: What Works? A Reanalysis of Citizen Complaints at the Organizational Level (Report, 2002), 20.

[9] Russell Glenn, Barbara Raymond, Dionne Barnes-Proby, Elizabeth Williams and John Christian, Training the 21st Century Police Officer: Redefining Police Professionalism for the Los Angeles Police Department (Rand Corporation, 2003), 99.

[10] "Buffalo Police Department Sworn Officer Demographic, June 10, 2016," acquired during interview with BPD officials, July 2016; U.S. Census Bureau, Buffalo (city) New York. http://quickfacts.census.gov/qfd/states/36/3611000.html.

[11] "Buffalo Police Announce New Recruitment Program," WGRZ, October 19, 2015, http://www.wgrz.com/story/news/local/buffalo/2015/10/19/buffalo-police-announce-new-recruitmentprogram/74234744/.

[12] "Police Exam Announcement," Buffalo Police Department, March 2016 (Accessed July 20, 2016, http://www.city-buffalo.com/files/1_2_1/Police/Police_Exam_Announcement.pdf).

[13] National Criminal Justice Officer Selection Inventory™ - NCJOSI™ I/O Solutions (Accessed July 20, 2016, http://www.iosolutions.org/Products_and_Services/OTS/National_Criminal_Justice_Officer_Selection_Inventory.aspx)

[14] @BPD21C (Twitter account), https://twitter.com/bpd21c.

[15] "Buffalo Police Department Adopts Language Access Plan for Limited English Proficient Individuals to Better Serve the City's Growing Diverse Communities," BPD Language Access Plan, Press Release, City of Buffalo, https://www.ci.buffalo.ny.us/Mayor/Home/Leadership/Archived_Press_Releases/2016_Archives/BPDLanguageAccessPlan.

[16] Daniela Porat, "Tempting a Ferguson in Buffalo," Investigative Post, October 31, 2016, and "Buffalo Police Training Lags," January 18, 2017.

[17] Malcom Sparrow, Handcuffed: What Holds Policing Back, and the Keys to Reform (Washington, DC: Brookings Institution Press, 2016), 8.

[18] Ashley Hirtzel, "City Orders Additional Training for Police Officers," WBFO, November 6, 2014, http://news.wbfo.org/post/council-orders-additional-training-city-police-officers.

[19] Roland G. Fryer, "An Empirical Analysis of Racial Differences in Police Use of Force," National Bureau of Economic Research Working Paper 22399 (NBER, July 2016), http://www.nber.org/papers/w22399.

[20] Cheryl Staats, Kelly Capatosto, Robin A. Wright, and Danya Contractor, State of the Science: Implicit Bias Review (2015): 65. Available from: Kirwan Institute: http://kirwaninstitute.osu.edu/wp-content/uploads/2015/05/2015-kirwan-implicit-bias.pdf.

[21] Peter Callaghan, "Professors and Police, How Minneapolis Project May Change the Way Cops Everywhere Relate to the Public," MinnPost, August 27, 2015. https://www.minnpost.com/politics-policy/2015/08/professors-and-police-how-minneapolis-project-may-change-way-cops-everywhere.

[22] The Center for Policing Equity, http://policingequity.org/about/.

[23] Deputy Commissioner Kimberly Beaty, Buffalo Police Department, interview with PPG, Buffalo, NY, May 12, 2016.

[24] Illinois Public Act 099-0352, http://www.ilga.gov/legislation/publicacts/99/PDF/099-0352.pdf and Matthew Speiser, The NYPD Will Now Issue 'Receipts' for Street Stops, September 29, 2015. Accessible at: http://www.businessinsider.com/nypd-issue-receipts-for-street-stops-2015-9.

[25] 9 Chapter C, Article 18-20, Commission on Citizens Rights and Community Relations, Charter of the City of Buffalo.

[26] City of Buffalo Charter, Section 13-18.

[27] Sarah Wooton and Denise Walden, "Another Voice: Build on progress in police reforms," *Buffalo News,* July 22, 2017, http://buffalonews.com/2017/07/20/another-voice-build-progress-police-reforms.

[28] Community Policing a Foundation for Restorative Justice, International Institute for Restorative Practices, August 12, 2000.

[29] https://www.leadbureau.org/

[30] Restoring Justice in Buffalo Public Schools: Safe and Supportive Quality Education for All, Citizen Action, Alliance for Quality Education, Public Policy and Education Fund, Advancement Project. July 2015. Available from http://www.aqeny.org/wp-content/uploads/2015/07/Buffalo-Report-Restoring-Justice-FINAL-WEB.pdf.

[31] U.S. v. City of Ferguson, Missouri, Consent Decree (Apr. 2016), 23. https://www.justice.gov/crt/file/883846/download.

[32] Bill Geller and Lisa Belsky, "Building Our Way out of Crime: the Providence, Rhode Island Case Study" (Geller and Associates, 2009). Available from www.gellerassociates.net.

[33] Captain Steven Nichols, interview with PPG, Buffalo, NY, December, 3, 2015.

[34] Brown Raises Summer Youth Jobs Goal to 2,500," City of Buffalo, accessed August 8, 2016, https://www.ci.buffalo.ny.us/Home/Leadership/Mayor/CitiStat_Buffalo/ArchieveCitiStatNews/2007Archives/BrownRaisesSummerYouthJobsGoalTo2500.