



Findings & Recommendations Regarding Use of Force for the Anchorage Police Department

September 2026

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Introduction & Executive Summary

The Municipality of Anchorage (the “Municipality”) engaged 21CP Solutions (“21CP”) to conduct a review and assessment related to the use of force practices, policies, training, tactics, and supervision of the Anchorage Police Department (“APD” or the “Department”). This report summarizes that work, presenting key findings and making specific recommendations about ways that the Department can enhance and strengthen its practices and processes.

Specifically, the Municipality asked 21CP to conduct its work in two parts. In Phase 1, 21CP was to conduct a review that would (1) identify features and attributes that lead to or are more frequently associated with the use of force, and (2) identify incident attributes and officer practices that may lead to or be associated with the deployment of force. During this phase, 21CP conducted a quantitative analysis of available data on all APD use of force between January 1, 2021 and June 30, 2025.

Notable findings include, but are not limited to:

- The overall number of incidents involving force, and the number of individual force applications, declined over the period of 2021 through 2024 – with a 17.0% reduction in 2024 compared to 2022 and a 4.7% reduction in 2024 compared to 2021.
- Incidents involving force are more likely to occur during the early morning hours of Saturday and Sunday.
- A relatively small number of APD officers are responsible for a disproportionate share of force, with 20 officers involved in some 19% of use of force incidents from January 2021 through June 2025. This includes 6 officers who were involved in 100 or more separate incidents involving force during the period.
- Most – nearly nine out of ten – APD force incidents are low-level, Level 1 incidents. Fewer than one percent of force incidents involved the most significant, Level 3 force. Most of this significant Level 3 force was associated with four specific call for service types: (1) driving under the influence, (2) eluding, (3) assault, and (4) burglary.
- Confirmed or possible observed mental illness was present among subjects in a significant portion (56.2%) of incidents where APD officers used force.
- A significant portion of uses of force (45.4%) involve American Indian/Alaskan Native subjects. Most (93.11%) of this force involving American Indian/Alaskan Native is lower-level Level 1 force. Among serious, Level 3 incidents, American Indian/Alaskan Native subjects account for 19.6% of use of force (compared to 34.8% of subjects who are white). Similarly, for intermediate Level 2 incidents, American Indian/Alaskan Native subjects represent 28.0% of subjects (compared to 34.4% of white subjects, 15.5% Black subjects, and 10.2% Asian/Pacific Islander).

- Officer injury rates across use of force incidents are relatively low, occurring in 7.7% of force incidents overall. Subjects were injured in approximately 14.5% of incidents, with subject injuries most common in lower-level, Level 1 force.

It also reviewed use of force incidents and investigations for 11 officer-involved shootings that occurred from January 1, 2024 through May 2025 and 34 randomly-selected Level 2 force incidents that were considered by the Department's Force Review Board in approximately the first nine months of 2025. Notable findings include, but are not limited to:

- Several significant force encounters involved individuals who APD officers either knew were experiencing mental illness, suspected based on actions and behavior were likely experiencing a behavioral health crisis, or that a reasonable officer under the circumstances would have suspected were having a behavioral health crisis.
- Several reviewed force incidents involved a fleeing subject, or a subject who officers appeared to believe posed a significant flight risk.
- In some encounters, officers elected to bypass the strategic use of distance, cover, or concealment when interacting with subjects, which may have limited their ability to use other, less-lethal force options.
- Communication among on-scene personnel was not as clear or dynamic as it should have been in several cases, leaving officers to respond and react without a communicated tactical approach.
- APD's use of (a) vehicle tactics, including boxing in and pinning, and (b) the PIT maneuver, is not uncommon, and, in some instances, the application has run the risk of placing officers, the public, and subjects at a higher risk than alternative high-risk vehicle encounter tactics might.

In Phase 2, 21CP was asked to evaluate APD policies, training, and other use-of-force practices, and to make recommendations for improvements and enhancements. 21CP therefore considered APD policies, procedures, manuals, memoranda, training curricula, and other written materials relating to the use of force and APD's response, review, investigation, and adjudication of use of force incidents. In addition to comparing APD practices to the approaches of other police departments, policing standards and practices nationwide, and best practice guidance, the review was informed both by the findings from the Phase 1 evaluation and by interviews, focus groups, and other engagement with a variety of APD personnel, Anchorage stakeholders, and community members.

After conducting an intensive review and assessment between July and October 2025, 21CP provided a memorandum to the Municipality and APD regarding Phase 1 in October 2025. It provided a separate memorandum regarding Phase 2 in November 2025. An initial draft of this final report – which substantially incorporated the contents of the Phase 1 and Phase 2 memoranda – was provided in February 2026. 21CP received thoughtful feedback and some factual clarifications from the Municipality and APD on each draft document, which it incorporated where, and only where, 21CP's independently determined that changes were appropriate.

An unformatted version of this final report was provided in March 2026. Other than this paragraph, and the addition of a more detailed breakdown of use of force incidents in terms of subject race summarized in Table 8 and discussed in adjacent text and briefly in section (above), the only difference between this final report and the March 2026 version is that this version has been re-formatted for final distribution and publication. The APD document attached to this final report as Appendix A, entitled “21CP Recommendations – Updated Gap Analysis,” is provided for additional context of what the Department indicates it has done to engage with or implement 21CP’s recommendations to date. Because 21CP received the APD document in mid-August 2026, this report does not evaluate the nature or sufficiency of what the Department summarizes there.

21CP’s specific recommendations are summarized in Table 1, below. Recommendations are also classified in terms of the necessary time horizon that may be necessary for the changes to be fully implemented. “Short-Term” refers to recommendations that could be fully implemented within 6 months or less. “Intermediate-Term” refers to work that could take between 6 and 18 months to complete. “Long-Term” refers to areas that may take longer than 18 months to fully address. Because many of 21CP’s recommendations suggest that APD make changes to policies and protocols, the identified time horizon attempts to account for the fact that full implementation requires both finalization of updated policies and the provision of training to sworn personnel on new performance expectations.

The remainder of this report details 21CP’s approach, methodology, findings, and recommendations. Where the 21CP team encountered limitations, these are noted and described. For many recommendations, the report provides examples of approaches from other police agencies and communities that the Department might evaluate as it considers making identified changes to policies and practices.

Additionally, this report identifies instances where 21CP learned about potential barriers or obstacles to implementation. Such barriers or potential impediments may include, for instance, the fact that a given recommendation implicates the current collective bargaining agreement with the Anchorage Police Department Employees’ Association (APDEA) such that changes may need to be addressed in subsequent contract negotiations. They might also include certain financial, technological, or operational considerations that might make implementation less feasible or straightforward than may be immediately obvious. Making some types of operational changes may also implicate staffing and other resource dynamics.

To this end, 21CP endeavored to approach its engagement with APD, and the crafting of the recommendations contained in this report, with humility. Although we believe that the recommendations outlined in this report are grounded in nationally accepted policing practices, emerging and promising public safety approaches, and an understanding of dynamics within APD, 21CP is not a part of APD or the Anchorage community. It is very possible, if not probable, that limits to our approach or available resources may have led us to overlook details, miss nuance, or bypass some areas of importance in some instances.

Ultimately, this report does not have all of the answers. None of our reports do because we do not have all of the answers. For that matter, it is unlikely that any one APD stakeholder or Anchorage community member alone has all of the answers when it comes to ensuring community and officer safety. Instead, the purpose of this report is to identify specific mechanisms through which APD can better provide the delivery of effective, lawful, safe, fair, and just public safety services to the people of Anchorage.

Table 1. Summary of Recommendations

Number	Recommendation	Implementation Time Horizon		
		Short-Term	Intermediate -Term	Long-Term
1	APD should continue to revise, update, and enhance its use of force policies to ensure that it provides personnel with streamlined, focused, and pragmatic guidance on officer use of force and use of force decision-making in the field.			
1.1	APD should consider streamlining and focusing its core use of force policy to maximize clarity, understanding, and utility for officers and supervisors.			
1.2	APD should strengthen existing policy language to include a comprehensive statement of purpose that affirms the sanctity of human life.			
1.3	Although existing APD policy meaningfully addresses de-escalation, APD should affirmatively require that officers employ de-escalation strategies, tactics, and techniques whenever safe and feasible to do so under the circumstances.			
1.4	Although APD policy addresses the topic of verbal warnings, its coverage of verbal warnings before the deployment of less-than-lethal and deadly force should be streamlined; could be more strongly and clearly worded; and could be clearer about exceptions to the general rule that officers provide a verbal warning before using force whenever safe and reasonable under the circumstances.			
1.5	Even as APD policy appropriately reflects the concept of proportionality, APD policy should use the term and require that officers, considering the totality of the circumstances, use force only when it is proportional to the nature of the threat or resistance posed by a subject under the circumstances.			
1.6	APD policy should provide sufficient detail on the factors that inform the “objective reasonableness” inquiry.			
1.7	APD policy should consider more specifically, comprehensively, and uniformly defining types of subject resistance and/or eliminating the use of those terms within the context of use of force reporting.			

1.8	APD policy should require that officers exhaust all other means reasonably available to them under the circumstances before using deadly force.			
1.9	APD policy should clarify confusion about the definition of “imminent threat” by emphasizing that a threat must be present and apparent based on the actions of the subject to justify deadly or significant force.			
1.10	APD policy should specifically prohibit: (a) the use of force against subject(s) who only verbally confront officers and/or are solely engaged in the exercise of First Amendment rights, and (b) retaliatory force. APD policy should clarify details relating to existing prohibitions on (c) the application of chokeholds, neck holds, and any other tactics that place pressure on the individual’s airway in any manner and/or run a reasonable risk of restricting the flow of blood and oxygen to a subject’s brain; and (d) the use of force against subjects who are handcuffed or otherwise restrained.			
1.11	APD policy should memorialize the Department’s current general practice and require that officers carry less-lethal instruments.			
1.12	APD’s use of force policy should impose an affirmative duty on officers to intervene when other officers are using force that runs a reasonable risk of violating law or APD policy.			
1.13	APD should update policies and training regarding less-lethal weapons.			
1.13a	Policy should caution officers against the use of OC spray in windy conditions, because it might affect individuals other than the intended target, and in circumstances where the flammability of OC spray might pose a risk (such as in conjunction with Tasers).			
1.13b	Policy should specifically prohibit the application of OC spray on individuals who are handcuffed or restrained unless they pose an immediate threat to officer or public safety.			
1.13c	APD should ensure that APD personnel receive regular, ongoing training on less-lethal instruments focusing not merely on technical re-qualification but on use of force decision-making in realistic scenarios that may implicate deployment of less-lethal weapons.			
1.14	APD should work to finalize current working Policy 3.08 regarding the deployment of canines.			
2	APD should update and enhance its overall training capacity to develop and provide dynamic, integrated, skills-focused, and scenario-based training grounded in adult learning principles and techniques.			

3	Whenever APD makes substantive changes to its use of force policies, it should provide initial and ongoing training to all sworn personnel to ensure that officers understand the new performance expectations.			
4	APD should provide regular, ongoing training to all sworn personnel on use of force. This training should focus on critical decision-making skills, de-escalation strategies, high-risk traffic stops, tactics and techniques to address circumstances where there is elevated concern of flight or the subject eluding law enforcement, peer intervention, and team tactics.			
5	APD should develop and provide all APD officers with initial and ongoing training focusing on cross-cultural communication, cultural competency, interactions with individuals with limited English proficiency, and procedural justice.			
6	APD should work to ensure that it collects more comprehensive aggregate data across all use of force incidents.			
7	APD should update and revise, as necessary, its use of force Level definitions to ensure greater clarity in incident reporting and data analysis.			
8	Officers involved in an officer-involved shooting should be assigned to duties other than in the field for a period of greater than the current four-day customary period.			
9	APD should continue to improve on the quality of use of force investigations by updating and enhancing applicable policies and protocols.			
9.1	APD should revise policies and procedures to ensure that all Level 1 force receives substantive supervisory review and that all Level 2 force investigations receive review from a more senior member of the command staff.			
9.2	Investigative interviews involving Level 2 and Level 3 force should be video-recorded whenever possible. If video-recording is not feasible, interviews should be audio-recorded. If interviews are audio-recorded, they should be transcribed for all Level 3 use of force, rather than only summarized, to ensure clarity and avoid confusion among subsequent reviewers.			

9.3	Involved officers in force incidents investigated by IA should be accompanied by a supervisor from the field to the station, and not by other officers, in part to ensure the integrity of initial officer incident accounts.			
9.4	Investigative reports and/or files should clarify when officer body-worn camera was turned off following an officer-involved shooting or other reportable force incident, as well as a description of the underlying circumstances.			
9.5	Policy should clarify primary investigators – including supervisors and IA – should focus on reporting the facts and circumstances of the incident. Investigators should not provide recommendations on the adjudication or disposition.			
10	To improve the capacity, continuity, and overall experience level of seasoned investigators, APD should consider adding at least one more investigator to Internal Affairs.			
11	APD should continue to revise, update, and enhance its policies and procedures relating to the review of use of force incidents and the role of the Force Review Board.			
11.1	APD policy should require that the Force Review Board review and analyze all Level 2 and Level 3 use of force incidents.			
11.2	APD policy should clarify that the FRB does not consider vehicle collisions that do not meet the definition of a use of force.			
11.3	APD policy and procedures should ensure that a part of the Force Review Board's responsibilities include consideration of training, equipment, policy, data, and other implications.			
11.4	APD should work to ensure that APD supervisors who believe that they cannot serve as an impartial party recuse themselves from the force review.			
11.5	APD should revise and refine its use-of-force adjudication categories to ensure that the focus of the adjudication is on whether officers performed consistent with APD policy.			
11.6	Following the final adjudication of an OIS, APD should conduct a sit-down tactical debrief involving all significantly involved personnel to identify strengths and weaknesses of performance, as well as lessons learned – regardless of whether the Department found that any involved personnel violated policy.			

12	Even as APD has taken tangible strides to be substantially more transparent at present than it was in the past with respect to officer-involved shootings, the Department should relay, both internally and externally, the internal outcomes/adjudications of investigations of officer performance during officer-involved shootings.			
13	APD should update and enhance protocols related to post-event support for families and impacted parties following officer-involved shootings and other critical incidents.			
14	APD should revise and update its Vehicle Tactics and Vehicle Pursuit policies, and update associated officer training, to promote greater clarity about officer decision-making regarding whether to initiate, continue, and/or terminate a pursuit. Included in this decision-making should be a careful balancing of public safety risks.			
14.1	The Vehicle Tactics policy should be clearer about what constitutes an “imminent” risk and/or threat.			
14.2	The definition of “public risk” should be expanded to encompass the risk posed to the public by a suspect fleeing and/or an officer engaging in a pursuit.			
14.3	Clearer guidance should be provided about the use of roadblocks.			
14.4	APD should ensure clarity regarding officer responsibilities to continually evaluate the risks associated with an in-progress pursuit.			
15	APD should revise and update its Vehicle Pursuit policy, and update associated officer training, to better promote officer safety and the effective resolution of situations involving individuals fleeing in vehicles.			
15.1	To enhance officer-safety, APD should modify its Vehicle Tactics policy to either prohibit or more specifically describe the potentially heightened risks of using Blocking and Rolling-Box in situations where officers reasonably believe that the vehicle occupants are armed with a firearm or are implicated in an original criminal offense that involved the use of a firearm.			
15.2	To promote officer safety, APD should limit the use of the “pinning” vehicle tactic to appropriately trained, specialized tactical units equipped with vehicle and other ballistic protection. Additionally, policy should more specifically define the vehicle speeds at which a pinning maneuver may be deployed.			

15.3	APD should consider prohibiting “ramming” subject vehicles. If “ramming” is permitted, it should be used only when deadly force is authorized and supervisor approval has been obtained.			
15.4	To ensure public and officer safety, APD should consider updating existing policy guidance regarding the Pursuit Intervention Technique to (a) limit the deployment of the PIT maneuver to situations where the maximum vehicle speed is 35 miles per hour, and rely on spike strips or other tire deflation devices for higher-speed pursuits, and (b) prohibit the use of the PIT maneuver and spike strips to areas where the risk of the subject losing control of the car and injuring members of the public is high.			
16	APD command staff should expand their presence at roll call (“fallout”), off-hour, and field activities to deepen the relationship with personnel and build trust within APD and to improve communication about departmental changes—especially the “why” of these changes throughout the ranks of the Department.			
17	To ensure meaningful and comprehensive implementation of APD’s Strategic Plan – including the refinement and implementation of force-related policies, procedures, and training – APD should ensure sufficient delegation and assignment of priorities across a broader leadership group.			
18	APD should periodically report – both internally and externally – on the status of recommendation implementation from the most recent APD Use of Force report, the Certus Report, and the Darcy report.			
19	APD should consider expanding its formalized professional development and mentorship programs.			
20	APD should ensure that it maintains mechanisms – such as a formalized Early Intervention System/Program, the establishment of use of force notification protocols combined with specific supervisory expectations for trend-based, informal performance appraisals, or other protocols – to ensure that any potentially problematic performance trends are identified and addressed early through non-disciplinary mentoring, training, or other support.			
21	The Department should work to develop more structured, ongoing opportunities for rank-and-file APD officers to engage informally with the broader Anchorage community.			

Part I. Features, Attributes, and Practices Leading to or Associated with the Use of Force

The Municipality of Anchorage asked 21CP, in Phase 1 of its work, to conduct a review that would:

- (1) Identify features and attributes that lead to or are more frequently associated with use of force incidents, and
- (2) Identify incident attributes and officer practices that may lead to or be associated with the deployment of force.

To do so, 21CP conducted a summary quantitative review of overall APD use of force data and a qualitative review of specific APD use of force incidents. This section of the report outlines 21CP's approach and methodology and provides key findings from its analysis of APD force data and review of force incidents.

A. Approach & Methodology

1. Analysis of APD Aggregate Use of Force data, January 2021 through June 2025

21CP requested all unaggregated data collected by APD on all use of force incidents from January 1, 2021 through June 30, 2025. This was to include, but was not limited to, data on (1) the type of force used; (2) characteristics of the responding officer(s); (3) characteristics of the involved subject(s); (4) characteristics and features of the underlying call for service or encounter (such as address, time of day, type of activity (e.g., self-initiated, warrant service, etc.); (5) characteristics and features of the force encounter; and (6) injuries to involved officer(s) or subject(s).

APD provided unaggregated data on encounters in which an APD officer deployed force for the requested period. Based on discussions with Department personnel, the data provided was the whole of the fielded, unaggregated data that it captured and maintains regarding use of force incidents.

At the outset, it should be noted that the current force data set has some limitations that prevent some useful types of analysis. In some instances, 21CP was able to work with the data to address some of the initial limitations. Most critically, APD's produced data did not include a field designating each incident as a Level 1, Level 2, or Level 3 incident per APD policy.¹ As this report elsewhere describes, the Department needs to work to ensure that information and data on force can be analyzed per force Level as a fundamental unit of analysis.

Nevertheless, because the data does provide sufficient detail on the specific type of force used (*i.e.*, technique, instrument, weapon, etc.), 21CP was independently able to categorize a significant portion (about 95.8%) of force incidents according to APD force levels as defined per Operational Procedure 3.05.020, "Reporting and Investigating Force"² and as summarized in Table 2. Less than 5% (4.2%) of the force incidents from January 2021 through June 2025 period could not be definitively categorized based on the available, aggregate information.

¹ Anchorage Police Department, Operational Procedure 3.05.020, "Reporting and Investigating Force" at Section I-A (last rev. Jan. 12, 2024).

² *Id.*

Table 2. Force Level Categorization Based on APD Aggregate Data on Force Technique Used

Technique	Level Assigned	Technique	Level Assigned
Cross-Face Lock	Level 1	Other Takedown	Level 1
CS Gas Discharge	Level 2	Pepperball	Level 2
Expandable Baton Strike	Level 2	Pinning/Prying	Level 1
Figure Four	Level 1	Pressure Point	Level 1
Foot Sweep	Level 1	Push/Shove	Level 1
Grab/Hold	Level 1	Push/Pull Takedown	Level 1
Hand Strike	Level 1	Push/Pull Technique	Level 1
Hobbles	Level 1	Rear Sentry Takedown	Level 1
Inside Takedown	Level 1	Reverse Palm	Level 1
Joint Lock	Level 1	Shotgun Discharge	Level 3
K9 Bark and Detain	Level 1	Straight Arm Bar Takedown	Level 1
K9 Physical Apprehension	Level 2	Tackle	Level 1
Kick	Level 2	Taser Cartridge Discharge	Level 2
Kinetic Energy Weapon Discharge	Level 2	Team Takedown	Level 1
Knee Strike	Level 2	Thigh Lock	Level 1
Lateral Head Displacement	Level 2	Total Restraints	Level 1
Leg Restraints	Level 1	Vehicle Blocking/Boxing	Level 1 (unless it was the highest level of force used, then “Level 0,” see below)
OC Spray Discharge	Level 2	Vehicle Pin	Level 2
Other	Unknown/Not Categorized	Vehicle Pit	Level 3
Other Strike	Level 2		

For all individual force techniques used across all force incidents with relevant data, levels of force were assigned. Subsequently, each incident was assigned with an overall force level, which is simply the highest force level for any technique deployed in the incident. For instance, an incident in which Level 2 and Level 1 techniques were both deployed would be considered as a Level 2 incident.

21CP’s assignments of force levels might, in some instances, differ from the Department’s actual classification for investigation and review purposes. Indeed, for some incidents, 21CP’s classification might be inaccurate to the extent that relevant information is not readily available in the aggregate data (e.g., a subject’s complaint of injury

leads to medical treatment and makes what would be, according to force used, a Level 1 incident instead classified as a Level 2 incident per APD policy³).

Additionally, it is possible that the particular circumstances of a force application or incident are causing some force to be categorized at a higher level than they should and other force to be categorized at a lower level than they should. For instance, this report's data analysis considers a kick as a Level 2 force incident. However, if an officer deployed such a kick to a subject's head, that might well constitute significant Level 3 force. Similarly, the nature of application of several Level 2 applications might constitute force that would classify the incident as a Level 3 to the extent that it created a "substantial risk of causing death" or involved "serious physical injury."

Another dynamic relates to incidents where the only force reported was "vehicle blocking/boxing." APD's current policy – in contrast to the approach of other police departments – classifies the use of the technique as force even when it involves no physical contact with a subject's car or person and implicates no injuries. To ensure that this force analysis was not unduly skewed by the inclusion of blocking/boxing, 21CP's analysis categorizes vehicle blocking/boxing as "Level 0" force, and this report discusses such force separately from other force categories. Most significantly, this means that use of force incidents in which "vehicle blocking/boxing" was the only type of force deployed are categorized for this analysis as "Level 0" force.

Finally, for purposes of 21CP's analysis and aggregate data reporting, incidents involving levels of force that could not be categorized were removed.

Despite these limitations – including the portion of incidents that could not be immediately categorized based on available data and the potential for the categorization to both over- and under-count incidents, depending on the type of force and the nature of the circumstances in which they were deployed – 21CP believes that its application of APD policy to provided data groups similar types and classes of APD force together in a way that facilitates a more detailed and useful analysis.

In other instances, 21CP could not address or work around limitations in the data that APD provided. Specifically, the provided use of force data:

- Does not include officer-involved shootings. Although 21CP was able to review all officer-involved shootings in 2024 and 2025, fielded, aggregate data for officer-involved shootings is not included alongside other types of Level 3 incidents, and lower-level (Level 2 and Level 1) force.
- Includes limited information on subject characteristics. The provided data set gives limited subject descriptions, with only subject race and mental illness status included. No data is provided on subject age, gender, language spoken, ethnicity, and other characteristics.
- Includes limited information officer characteristics. The provided data set does not provide detailed information on officer age, race, gender, ethnicity, and other characteristics. It is likely that APD retains this information in other databases (human resources, etc.), but force database systems often log this information to streamline analysis and ensure data accuracy.

³ *Id.* at Section I-A-2-i.

- Includes limited information about circumstances and factors leading up to force being used. In the provided data, “Reason for Force” and subject “Resistance Displayed” are the primary two data categories that speak to factors bearing on the extent to which force deployed may be reasonable, necessary, proportional, consistent with de-escalation, and otherwise consistent with APD policy.
- Does not include detailed information on overall incident characteristics. Information about environmental factors, including weather and lighting conditions, do not appear to be captured in fielded, aggregate data.

As the remainder of this report demonstrates, the provided information is – despite the limitations described above – still useful for generating insights about the circumstances, factors, and conditions that tend to be associated with force incidents in Anchorage.

2. Review of APD Use of Force Incidents and Investigations

In addition to aggregate force information, 21CP reviewed a number of specific, recent APD force incidents. First, 21CP reviewed information on 11 officer-involved shootings that occurred from January 1, 2024 through May 2025. Investigative materials were not available for 2 other officer-involved shootings that occurred during the time period.

As noted previously, 21CP’s review of force incidents informed a number of recommendations, memorialized in Part II of this report, relating to APD’s investigation, review, analysis, and adjudication of force incidents. The 21CP team notes here that, although the overall quality of the Department’s internal administrative investigations has improved significantly since mid-2024, APD will need to make further strides to ensure high-level administrative investigations of incidents going forward.⁴ To this end, several administrative investigations in 2024 did not include some important types of information, including descriptive information of the subject and the condition of the subject’s firearm (*i.e.*, loaded or unloaded). Although 21CP reviewed all information on officer-involved shootings that APD produced, and in some instances reviewed video or information made publicly available by others, the review of at least some of these force incidents may not have benefitted from as full or comprehensive of an investigation file or evidentiary record as would be optimal.⁵

Separately, 21CP also reviewed a sample of 34 randomly selected Level 2 force incidents that were reviewed by the Department’s Force Review Board during the first 9 months of 2025. This means that 34 incidents were reviewed out of 67 overall cases heard by the FRB. This number was selected using a 10% margin of error and 90% confidence level – meaning that, although 21CP reviewed some but not all FRB cases, it can be 90% confident that the sampled cases differ by plus or minus 10% along any reviewed dimension. Put differently, this allows 21CP

⁴ 21CP emphasizes that it reviewed only APD’s internal *administrative* investigations, not criminal investigations, of use of force incidents for this assessment.

⁵ APD noted that because it reviewed only APD’s internal administrative investigations, not criminal investigations, of use of force incidents for this assessment, such information may have been captured by the criminal investigation but not copied over into the administrative investigation.

reasonable confidence that, even if it reviewed another sample of 34 cases or even all incidents considered by the FRB instead of a sample, its observations and conclusions would not be substantially different.

For reviews of both officer-involved shootings and Level 2 force incidents, 21CP's review assessed the totality of circumstances that the involved officer(s) confronted, as established through available evidence, and considered what a reasonable officer would have done under the circumstances.

This mode of inquiry is an *objective* rather than subjective one, which has some important implications. First, the review was not about whether the Team's experts believed that they would have done the same thing had they been in the officer's shoes, or whether they subjectively believed the force to be appropriate. Instead, the required inquiry focused on what a reasonable officer would have done under the circumstances that the involved officer(s) encountered.

Second, as the Supreme Court has recently affirmed, a use of force may be justified or not justified "at the moment" it occurred partly because of what had transpired in the preceding period"– such that "earlier facts and circumstances" than those encountered at the moment that an officer used force "may bear on how a reasonable officer would have understood and responded to later ones."⁶ Consequently, 21CP's review considered the whole of the facts and circumstances that led to, were involved in, and followed the specific application(s) of force.

Third, the standard of review was not what reviewers believed that the involved officer could or should have done differently with the "20/20 vision of hindsight."⁷ Rather than an exercise in second-guessing or "Monday morning quarterbacking," 21CP's law enforcement experts considered performance in light of the circumstances that the involved officer actually encountered and what a reasonable officer on the scene would have known or appreciated about those circumstances.

Additionally, the analysis of an officer's performance during a use of force incident must consider an officer's actions "without regard to their underlying intent or motivation."⁸ An "officer's good intentions" do not "make an objectively unreasonable use of force constitutional," consistent with APD use of force policy, or otherwise appropriate.⁹ The 21CP team therefore evaluated the officer's objective performance and not the purported intent of the involved officer(s).

Finally, because 21CP's charge was to explore the specific factors and circumstances that appear to be associated with officers using force, the review and analysis summarized in this report references some trends and tactics that did indeed appear to more systematically be associated with instances in which APD officers used force. However, these trends by themselves do not indicate, one way or another, whether specific force applications were reasonable, necessary, proportional, and consistent with de-escalation principles in individual incidents.

⁶ *Barnes v. Felix*, 605 U.S. __, 6, 5 (2025).

⁷ *Graham v. Connor*, 490 U.S. 386, 396 (1989).

⁸ *Id.*

⁹ *Id.*

B. Aggregate Use of Force Data Analysis: Findings

This section summarizes key findings from the data analysis outlined in Section I, above. The following discussion, and related data tables, speak both in terms of *force incidents* and *force applications*. A single *force incident* (an encounter or circumstance in which at least one officer employs some sort of reportable force) may involve:

- Multiple types of force (*i.e.*, more than one force instrument or type of physical technique);
- More than one Level of force (*i.e.*, the use of a Taser (Level 2 force) and a pain compliance technique (Level 1 force));
- Multiple applications of the same force (*i.e.*, two distinct discharges of a Taser or different hand control applications at different times during the encounter); and/or
- Multiple officers applying force.

Generally, the distinguishing factor is that a force incident includes applications of force and the attendant facts and circumstances that stem from a common nucleus of operative fact – that is, that are related to the same string of events or set of circumstances.

Separately, a *force application* refers specifically to a single, distinct application of physical force – one specific deployment of a particular technique, tactic, or instrument. Thus, an encounter with a subject in which an officer applied both one cycle of a Taser and a pain compliance technique would be considered one *force incident* but would be counted as involving two *force applications*. Because many force incidents involve multiple applications of force, aggregate totals for *force applications* are higher than the number of *force incidents*, as Table 3, below, summarizes. This report focuses substantially on *force incidents*, but it also discusses discrete *force applications* within those incidents.

- **The overall number of incidents involving force, and the number of individual force applications, declined over the period of 2021 through 2024.**

As Table 3 details, APD’s use of force in 2024 was lower than any year from 2021 through 2024 – both in terms of the total number of incidents in which APD officers used force and the total number of individual applications of physical force across those incidents. This is a 4.7% reduction in force incidents in 2024 compared to 2021 and a 17.0% reduction in 2024 compared to 2022.

Level 0 force—defined as using a police vehicle to block or box in a subject preemptively to prevent fleeing—was excluded from Table 3 and the analysis above because 21CP understands from APD that blocking and boxing are tactics that do not involve physical contact or impact with either a subject’s vehicle or body. In total, there were 408 incidents and 568 applications where Level 0 force (vehicle blocking/boxing) was the *only* force used. While overall use of force incidents and applications declined from 2021 to 2024, this “Level 0” force *increased* by 35.6% during the same period.

This Level 0 force appears to represent a precautionary tactic used by APD officers to prevent flight during enforcement encounters. Anchorage data indicate that this tactic is typically used during encounters when a subject is believed to pose a high risk of fleeing rather than actively resisting or

threatening officers. Nearly 60% (59.6%) of incidents involving level o force occurred when the subject's highest level of resistance was passive, while another 38.7% involved active resistance. Fewer than 2% of these incidents involved assaultive or deadly resistance. Consistent with its preventative purpose, Level o force is most often used in investigations involving stolen vehicles (24.5%), warrant service (21.8%), and driving under the influence (16.4%).

Table 3. Total APD Use of Force Incidents & Force Applications (excluding Level O), 2021–June 2025, By Year

Year	Total Use of Force Incidents	Total Individual Applications of Force
2021	1,205	2,838
2022	1,384	3,097
2023	1,299	2,864
2024	1,148	2,523
2025 (through June 30)	683	1,466
TOTAL (January 1, 2021– June 30, 2025)	5,719	12,788

Although the data show that no officers or subjects were injured in nearly all instances where only Level o force was used—including 99.8% of cases without officer injury and 100% of incidents without subject injuries—and that the technique was considered effective in 93.6% of incidents, its use raises important considerations.

A substantial majority of these encounters involved felony-level offenses (66.9%), and nearly one-quarter involved misdemeanors. The most common reasons for Level o force were high-risk traffic stops (45.6%), prevention of escape (37.8%), and effecting arrest (30.4%)—often linked to stolen vehicles, warrants, and driving under the influence.

- **Even as APD's overall number of use of force incidents declined over the evaluated period, the overall rate of force appears to be somewhat higher, per capita, than some similar communities.** Although it is an imperfect gauge, 21CP looked to benchmark APD's overall volume of force incidents in light of other cities.

As Table 4 details, APD's use of force per capita (*i.e.*, number of use of force incidents per 100,000 residents) is higher than any of Boise, Portland, Seattle, or Spokane – and is almost twice as high as New Orleans.

We strongly caution that, by themselves, overall numbers of force incidents or the number of force incidents per capita does not say anything about the appropriateness of force in individual encounters. Indeed, there are many reasons why APD's overall *per capita* force rate is higher than some other jurisdictions. It could be that officers in Anchorage encounter a comparatively higher

number of subjects who are resistant or non-compliant in a way that poses a threat to others or officers and requires force. For instance, 21CP understands that Alaska Statute Section 18.65.530 requires law enforcement officers to arrest individuals when they have probable cause to believe that they have committed domestic violence or violated a protective order in the prior 12 hours.¹⁰ As “[d]omestic-related calls for service . . . are one of the most dangerous calls for officers,”¹¹ and APD officers must take significant enforcement action across a number of those encounters, it is possible that overall force numbers are higher in Anchorage and other Alaska agencies.

Separately, APD covers a service area substantially larger than any of the cities used for this general comparison – some 1,706 square miles compared to the 516 square miles patrolled by the Portland (Oregon) Police Bureau or the 143 square miles covered by the Seattle Police Department. APD does this even as it fields fewer than half of the number of officers as Portland does and just one-third of the number of officers in Seattle. These dynamics mean that APD officers less readily enjoy the tactical support of other officers – limiting de-escalation opportunities and potentially heightening the risks to officers and nearby members of the public when subjects pose a threat of harm.

Additionally, policies differ among police agencies as to precisely what is reportable force. As this report describes elsewhere, APD counts some encounters as reportable force that other agencies would not – potentially complicating the utility of cross-agency comparison and making it appear that the Department is *using* force more than other agencies when it is simply *counting* force differently.

Table 4. APD Total Use of Force Incidents Compared to Other Cities

City	Use of Force Incidents	Population	Use of Force Incidents Per 100,000 Persons	Number of Officers	Crime rate per 100,000	Square Milage of Service Area
Anchorage	1,148	289,600	397	349	3,811	1,706
Boise	151	237,963	63	330	1,427	84
New Orleans	910	362,701	251	898	3,697	350
Portland	786	635,749	124	878	6,288	516
Seattle	1,169	780,995	150	1,200	5,802	143
Spokane	86	230,069	37	333	3,138	516

Notes: Use of force data for Spokane is for 2023. All other use of force data is for 2024.

- **Incidents involving force are more likely to occur during the early morning hours of Saturday and Sunday.** As is typical for most police agencies, use of force incidents are most likely to occur on weekend nights – on Friday and Saturday evenings and into the early morning hours of

¹⁰ AK Stat § 18.65.530 (2024).

¹¹ Roberto Santos & Rachel Santos, U.S. Department of Justice, Office of Community Oriented Policing Services, *Proactive Police Response to Domestic-Related Repeat Calls for Service* 1 (2023).

the ensuing Saturday and Sunday. All levels of force are most common on Sundays from 12:00am to 6:00am.

- **A relatively small number of APD officers are responsible for a disproportionate share of force.** 402 unique APD personnel used force during the period of January 2021 through June 2025. However, just 5% – or 20 officers – were involved in some 19% of use of force incidents during that period. This includes 6 officers who were involved in 100 or more separate incidents involving force between January 2021 and July 2025.

These 20 officers involved in the highest number of use of force incidents also accounted for more than one out of five (20.9%) total APD individual force *applications* within the 2021 through 2025 time period. These 20 officers were therefore responsible for some 2,674 force applications among 12,788 total APD force applications. Overall, 24 APD officers applied some of type of force more than 100 times between January 2021 and July 2025, with two officers each responsible for over 200 force applications.

This phenomenon – of a small minority of a department’s officers being involved in a disproportionately high number of force incidents or responsible for a disproportionately significant volume of force applications – is common.¹² Indeed, there are reasons why this fact might not ultimately be problematic or worrisome for APD. First, it is possible that these “top 20” officers have assignments and/or work in areas in which they are more likely to engage with noncompliant, resistant, or assaultive subjects. Second, and relatedly, it does not necessarily follow from the number of force incidents in which an officer is involved or the volume of force that an officer applies that such force is inconsistent with law or policy.

At the same time, however, these numbers do suggest that some critical part of APD’s use of force is being driven by a comparatively small group of officers – and that a much larger group of APD personnel are accomplishing their duties in a manner that implicates force less regularly.

- **Most APD force incidents are Level 1 incidents. Roughly one in ten incidents were intermediate Level 2 force, while the most serious Level 3 force occurs in fewer than 1% of all cases.** After excluding force that cannot be categorized and Level 0, it appears that nine out of ten (89.4%) of all APD force incidents were comparatively less serious Level 1 incidents – meaning that, in a vast majority of APD incidents, nothing more significant or severe than Level 1 force has been deployed by officers. In 0.8% of all categorized incidents, APD officers deployed comparatively serious Level 3 force, which is defined in current APD policy as force: “resulting in death;” involving “[a]ny critical firearm discharge;” “creat[ing] a substantial risk of causing death;” that does “cause[] serious physical injuries;” involving an “intentional impact weapon strike to the head;” and/or that is a “serious use[] of force, excluding canine bites,” which is defined elsewhere in APD policy as “[a]ny

¹² See, e.g., *Report of the Independent Commission on the Los Angeles Police Department* x (1991), available at <https://archive.org/details/ChristopherCommissionLAPD/mode/2up> (observing that, across a period of a little more than 4 years, two-thirds of LAPD officers had five or fewer use of force reports while 63 officers had 20 or more reports, with “[t]he top 5% of officers (ranked by number of reports) account[ing] for more than 20% of all reports”).

action by an Officer that involves: 1) the use of deadly force, including all critical firearm discharges; [or] 2) a use of force in which the person suffers serious physical injury or requires hospital admission.”¹³

A moderate share of categorized incidents – 9.9% – can be classified as Level 2 force. As this report discusses further below, aggregate totals for specific techniques/applications that APD policy classifies as Level 2 force appear consistent with the idea that incidents in which intermediate, Level 2 force is the maximum force applied is relatively limited.

Table 5. Total APD Use of Force Incidents & Force Applications, 2021–June 2025, By Level

Maximum Level of Force Used	Total Use of Force Incidents	Percentage of Use of Force Incidents	Percentage of Categorizable Force Incidents
Level 1	4,881	85.4%	89.4%
Level 2	540	9.4%	9.9%
Level 3	42	0.7%	0.8%
Unknown/Unable to be Categorized	256	4.5%	–
TOTAL	5,719	–	–

Note: “Use of Force level” refers to the maximum level of force used during each unique incident. Percentages are calculated only from incidents that could be categorized into levels, with Level 0 excluded from the overall numbers, totals, and percentages.

This general trend was consistent across individual calendar years during the time period studied – with small observed deviations but relative portions not deviating by any more than 4% among any of the years from 2021 through 2024.

- **Three-quarters of Level 3 force is linked to four specific call for service types: (1) driving under the influence, (2) eluding, (3) assault, and (4) burglary.** Table 6 summarizes the portion of each level of force, and force overall, that was associated with specific call types over the period of 2021 through June 2025. This analysis identifies that, overall, assaults are the most common service type associated with use of force (with 21.7% of force incidents relating to a call for service coded as relating to an assault), followed by warrant service (12.7% of force incidents occurring within a call coded as warrant service).

More than three-quarters of the most serious, Level 3 force – which, again, does not include officer-involved shootings – occurs within the context of calls for service for driving under the influence, eluding, assault/assault info, and burglary residence or commercial. While “eluding” is associated with 2.3% of force incidents overall, “eluding” accounts for one-quarter (25.9%) of Level 3 force. Similarly, while “driving under the influence” encounters are associated with 7.4% of force incidents overall, they account for nearly a third (30.2%) of Level 3 force. This is distinct from, for instance,

¹³ Operational Procedure 3.05.020, “Reporting and Investigating Force” at § I-A-3, 3 (last rev. Jan. 12, 2024).

“assault/assault info” calls for service – which account for some 21.7% of all force incidents but just 13.8% of Level 3 force (compared to 22.0% of Level 1 force and 20.2% of Level 2 force).

Table 6. Percentage of Use of Force Applications By Call for Service Types, Per Force Level and Overall (2021–June 2025)

Call For Service Type	Level 1	Level 2	Level 3	TOTAL (All Force)
Assault/Assault Info	22.0%	20.2%	13.8%	21.7%
Warrant Service	12.3%	15.6%	0.0%	12.7%
Mental Subject	7.7%	0.5%	0.0%	6.6%
Driving Under The Influence	7.0%	8.6%	30.2%	7.4%
Disorderly Conduct	6.7%	1.3%	0.0%	5.9%
Trespass	5.2%	1.3%	0.0%	4.6%
Resist Arrest	4.9%	2.2%	0.0%	4.5%
Vandalism	4.7%	2.6%	0.9%	4.4%
Suicide Attempt/Threat	3.8%	0.6%	0.0%	3.3%
Disturbance	2.7%	0.6%	0.0%	2.4%
Burglary Residence Or Commercial/Info	1.6%	2.8%	6.9%	1.8%
Stolen Vehicle	1.6%	16.0%	6.0%	3.7%
Theft/Larceny	1.5%	0.6%	0.0%	1.4%
Shoplift	1.5%	1.0%	0.0%	1.4%
Violation Of Release Conditions	1.4%	0.8%	0.0%	1.3%
Robbery/Robbery Information	1.3%	2.2%	3.5%	1.5%
Misconduct Inv Weap/Driveby Shoot	1.3%	3.0%	0.9%	1.5%
Drug Info/Possess/Sale/Other	1.1%	1.5%	0.0%	1.2%
Agency Assist	1.1%	0.8%	0.0%	1.0%
Drunk Problems	1.0%	0.1%	0.0%	0.8%
Violation Of City/State Regs	1.0%	0.6%	0.0%	0.9%
Harassment	0.7%	0.0%	0.0%	0.6%
DV Violation	0.7%	0.5%	0.0%	0.6%
Eluding	0.6%	10.9%	25.9%	2.3%
Child Neglect	0.6%	0.4%	0.0%	0.5%
Traffic Violation/Incident/Dwoi	0.4%	0.1%	0.9%	0.4%
Traffic Collision	0.2%	0.1%	6.0%	0.3%
Homicide/Manslaughter/Info	0.1%	1.2%	2.6%	0.3%

The 21CP team observes that a relevant common factor among eluding and driving under the influence calls is that the individual either is fleeing or possesses the immediate means (a vehicle) to flee from officers. At the same time, it may also be that subjects involved in these encounters are particularly resistant or likely to pose a significant threat to officers or others. Regardless of the dynamics in any particular instance, it would appear that APD policy and training going forward

should emphasize force decision-making in the context of situations where the circumstances pose an elevated concern of flight or the subject eluding law enforcement.

Separately, the notable portion of overall force related to warrant service suggests that APD could benefit from a close evaluation of its warrant service procedures, planning, policies, training, and supervision.

- **Force is most commonly used in connection with effectuating an arrest, accounting for 76.3% of all incidents.** In these cases, the force used typically does not exceed Level 1 (89.3%), though roughly one in ten involve Level 2 force (10.0%). Preventing escape accounts for another 12.8% of all force incidents, and protective custody for 15.2% – both of which also predominantly involve Level 1 force. The most serious uses of force, Level 3, is most often used during arrests, accounting for 69.0% of Level 3 incidents. Preventing escape is the second most common context, representing 38.1% of Level 3 incidents.
- **With respect to individual force applications, incidents associated with “assault/assault info” as the underlying call for service have the highest average number of force applications involved.** Force incidents relating to an “assault/assault info” call have, on average, 8.5 uses of force per officer involved. This is followed by “warrant service,” with 5.7 average uses of force per officer; “driving under the influence,” with 4.3 average uses of force per officer; “mental subject,” with 3.6 average uses of force per officer; and “disorderly conduct,” with 3.4 average uses of force per officer.
- **Force is most commonly used in connection with misdemeanor, rather than felony, offenses.** Nearly half (52.1%) of all APD force is used in situations that are connected to offenses that do not rise beyond that of a misdemeanor level. Another 36.5% of force is used in connection with felony offenses.
- **When APD uses force, the subject’s level of resistance is most frequently described as “active resistance.”** When resistance is displayed by a subject, it is most often active resistance (76.7%) or assaultive resistance (17.4%), both of which typically result in the use of Level 1 force (with 90.2% of all force incidents in which the subject’s resistance is described as active resistance involving Level 1 force, just 9.1% involving Level 2 force, 0.7% involving Level 3 force. Assaultive resistance was displayed by subjects in 17.4% of force incidents overall, with Level 1 force the most typical (in more than 86.3%) of incidents involving assaultive resistance.
- **Data on the specific type of force deployed by APD officers does not offer many clear, systematic trends.** APD data includes two fields that describe the specific type of force (*i.e.*, the instrument, technique, maneuver, or physical tactic deployed). The most common techniques are, unsurprisingly, “soft hand control” occurs in 93.4% of incidents.

It is unclear to 21CP, based on available data, how frequently APD deploy intermediate/less-lethal force instruments. On the one hand, aggregate data suggests that less-lethal weapons were deployed in 4.8% of incidents between January 2021 and June 2025, with intermediate weapons deployed in

1.0% of incidents during the period. However, the data on specific *types* of less-lethal tools suggests that they are used even less frequently. For instance, an “expandable baton strike” was used in less than 0.1% of force incidents, only 1 total instance of OC spray discharge (0.0%), pepperballs in 1.0% of incidents, and 4 incidents involving a Taser Cartridge Discharge (0.1%). Although a few classes of potential intermediate/less-lethal deployments appear to be missing as categories for selection (*e.g.*, use of a Taser in drive-stun mode), adding up information on when specific *types* of intermediate/less-lethal force instruments does not entirely align with the overall 4.8% of force incidents involving less-lethal weapons.

- **Some 5% of incidents in which officers deployed force involved an officer-reported maximum subject resistance level of “passive.”** Data for each force incident provided by APD includes a characterization of the subject’s resistance exhibited during the encounter, and this appropriately captures multiple types of resistance within the same encounter. For instance, for an incident in which a subject who exhibited passive resistance early in an encounter but then displays active resistance later in the same encounter, the available data might reflect the resistance level as involving *both* passive and active resistance.

To gain a better understanding of the relationship between the type and level of force used by APD officers and a subject’s resistance, 21CP analyzed use of force incidents according to the *maximum* subject resistance level. Consequently, for the example above in which a subject exhibits both passive and active resistance within the same incident, the overall incident for this analysis can be coded as “active resistance” because that level of resistance is at a higher level of significance than “passive resistance.”

Table 7. Maximum Subject Resistance Level, Use of Force Incidents, January 2021–June 2025

Resistance Level	Number of Use of Force Incidents	Percentage of Use of Force Incidents
4 – Deadly Assault	25	0.5%
3 – Assaultive	951	17.4%
2 – Active Resistance	4,190	76.7%
1 – Passive	274	5.0%
0 – Suicidal	23	0.4%

Note: Force Level 0 and data that could not be categorized by Force level were excluded from this table and analysis.

Table 7 summarizes the number and percentage of APD use of force incidents during the evaluated period according to the maximum resistance level deployed – showing the range of severity of resistance from passive (“1”) to deadly (“4”).¹⁴ In a significant majority (76.7%) of use of force encounters, subjects exhibited what APD officers and data describes as “active resistance.” Another

¹⁴ Because “suicidal” by itself does not identify anything concrete about a subject’s resistance or non-compliance, it is coded and reflected as “0.” For purposes of the chart, the 31 incidents in which “suicidal” was the maximum subject resistance level means that no other resistance level was indicated beyond “suicidal” in available APD data.

17.4% of force incidents involved a maximum resistance level of “assaultive” resistance, and 0.5% of incidents involved “deadly assault.”

Some 5.0% of incidents in which officers deployed force involved a *maximum* subject resistance level of “passive” – meaning that no more significant level of resistance (active, assaultive, deadly assault) was recorded in APD data. (As the note to Table 7 indicates, instances where vehicle blocking/boxing, pinning, or the PIT maneuver was the only type of force used were classified as “Level 0” and were excluded from those totals for the purposes of the present analysis. Incidents where officers employed vehicle blocking/boxing, pinning, or the PIT maneuver *and* some other type of force accounted for 36 of the 274 instances (13.1%) where force was used against subjects classified as passively resistant.) Among these “passive resistance” incidents, most (89.8%) involved Level 1 force, 7.3% involved Level 2, and 2.9% involved Level 3 force. Overall, across all Level 3 force incidents, nearly one-fifth of incidents (19.0%) involved subjects who, according to APD, exhibited nothing more significant than passive resistance.

The large number and portion of Level 3 incidents involving only passively resisting subjects, as well as the low number of Level 2 force with respect to such subjects, suggests that a sustained emphasis in APD policy and training on proportionality, necessity, and de-escalation may be warranted and helpful.

21CP does observe here that APD’s policies on deploying force (3.05.025, “Response to Resistance”) and reporting force (3.05.020, “Reporting and Investigating Force”) effective as of October 3, 2025 do not define “active resistance,” “assaultive” resistance, or “deadly assault.” Without clearer definitions, it is possible, if not likely, that data on subject resistance is not as accurate or systematic as it could be.

- **Confirmed or possible observed mental illness was present among subjects in a significant portion of APD force incidents.** Across encounters from 2021 through 2025, officers indicated that subjects were experiencing mental illness in 20.5% of total incidents. In another 33.7% of instances, officers indicated that subjects were possibly experiencing mental illness. Overall, then, in more than half (56.2%) of incidents where APD officers used force, the subject’s mental state and/or mental health condition was at issue.

Even as a sizable portion of force subjects were affirmatively or possibly experiencing a mental illness, the data does not immediately suggest that such subjects were disproportionately more likely to be subject to more significant or higher-level force. Specifically, subjects who APD officers affirmatively confirmed that the subject was experiencing a mental illness accounted for 4.8% of Level 3 force incidents, 9.4% of Level 2 incidents, and 21.8% of Level 1 incidents. Subjects who APD officers *either* affirmatively confirmed were experiencing mental illness *or* who the force database lists as *possibly* experiencing mental illness accounted for 26.2% of Level 3 incidents, 37.7% of Level 2 incidents, and 56.2% of Level 1 incidents.

- **A significant portion of uses of force involve American Indian/Alaskan Native subjects—at a rate that is substantially higher than their representation in the Anchorage**

population. American Indian/Alaska Native subjects were involved in 45.4% of force incidents between January 2021 and June 2025. Subjects identified as Black/African American were involved in 12.9% of officer use of force incidents overall.

A significant portion (93.11%) of this force involving American Indian/Alaskan Native is lower-level Level 1 force. Among serious, Level 3 incidents, American Indian/Alaskan Native subjects account for 19.6% of use of force (compared to 34.8% of subjects who are white). Similarly, for intermediate Level 2 incidents, American Indian/Alaskan Native subjects represent 28.0% of subjects (compared to 34.4% of white subjects, 15.5% Black subjects, and 10.2% Asian/Pacific Islander).

Table 8. Use of Force Incidents by Race (excluding Level 0), 2021–June 2025

Race Description from APD Data	Level 1 Force Incidents	Level 2 Force Incidents	Level 3 Force Incidents	Total Use of Force Incidents
American Indian/Alaskan Native	2,311 (45.5%)	162 (28.0%)	9 (19.6%)	2,482 (45.4%)
Asian/Pacific Islander	244 (4.8%)	59 (10.2%)	4 (8.7%)	307 (5.6%)
Black	609 (12.0%)	90 (15.5%)	6 (13.0%)	705 (12.9%)
White	1,439 (28.3%)	199 (34.4%)	16 (34.8%)	1,654 (30.3%)
Unknown/Blank	480 (9.4%)	69 (11.9%)	11 (23.9%)	560 (10.3%)

Note: Displayed percentages represent the portion of subjects involved in force incidents of the respective levels in each column (Level 1, Level 2, and Level 3) and overall. Therefore, the percentages add up to 100% in each column.

Overall population statistics are often an incomplete and imperfect comparative metric with respect to disparity analyses – with other, more complex statistical methods serving as better and more realistic approaches for determining the nature and scope of any disparity.¹⁵ However, comparison to the general population has frequently been used as one preliminary benchmark for gauging disparity within police interactions.¹⁶

In Anchorage, the representation of American Indian/Alaska Native and Black/African American among subjects in officer use of force incidents is significantly higher than their relative share of the overall Anchorage population per the 2020 United States Census (7.3% of Anchorage population compared to 45.4% of use of force subjects for American Indian/Alaskan Native individuals and 5.0% of the Anchorage population compared to 12.9% of use of force subjects for Black/African American

¹⁵ See Jerry H. Ratcliffe & Shelley S. Hyland, “Police Stops and Naïve Denominators,” *14 Crime Science* 1 (2025).

¹⁶ See, e.g., Jeffrey Fagan, “Report of Jeffrey Fagan, Ph.D.,” *Floyd v. City of New York*, S.D.N.Y., 1:08-cv-01034 at 2, available at https://ccrjustice.org/files/Expert_Report_JeffreyFagan.pdf; G. Ridgeway, RAND Corporation, *Analysis of Racial Disparities in the New York Police Department’s Stop, Question, and Frisk Practices* at 14–16 (Nov. 9, 2007), http://www.rand.org/pubs/technical_reports/TR534.html.

individuals).¹⁷ Meanwhile, although white subjects comprise 56.8% of the Anchorage population, where APD officers used force, the involved subject was white in 30.3% of incidents.¹⁸ APD data, which uses State of Alaska racial categories, does not include a category for “two or more races,” but U.S. census data does. The U.S. Census statistics cited here are for single-race categories, with population numbers for “two or more races” separately reported. Because APD and U.S. Census categories do not align along some key dimensions, this difference further limits the insight that can be gained from a simple comparison of the races of force subjects to overall population data.

Additionally, 21CP emphasizes that the racial trends with respect to subjects of force incidents do not say anything about the legality of force deployed or about whether APD is doing anything to contribute to those trends – or whether, instead, the trends reflect larger social dynamics that are not primarily related to what the Department or its personnel are doing or not doing.

- **Officer injuries occur during a relatively small portion of force incidents and relatively evenly across levels of force.** At least one APD officer reported injuries in 7.7% of force incidents. Officer injury rates were consistent across Level 1 (7.0% of incidents), Level 2 (14.3%) and Level 3 (4.8%) incidents.
- **Subject injuries were most represented within Level 1 force.** Overall, subjects were injured in approximately 14.5% of force incidents. Subjects were most likely to incur injuries during Level 1 incidents (75.3% of incidents where there were subject injuries) and Level 2 incidents (23.8% of incidents with subject injuries) than serious Level 3 incidents (0.9% of incidents with subject injuries). There are a few potential explanations for this trend. First, and most obviously, subjects may be especially likely to be injured through the application of the force instruments and techniques that APD classifies as Level 1 or Level 2 force – including various types of strikes, kicks, and takedowns; the application of a chemical agent, ECW, or specialty impact munitions; a head strike (except an intentional strike with an impact weapon); and canine bites.¹⁹

Separately, APD policy defines Level 2 force to include “[a]ny use of force which results in injuries or a complaint of injury that requires any medical treatment to the subject or Officer.”²⁰ The high rate of subject injuries in Level 2 force may simply reflect that force that would otherwise be classified as Level 1 and causes injury – but not “serious physical injury”²¹ – is classified at the higher level, making complaint of or actual injury a disproportionate driver in Level 2 force numbers.

C. Review of Force Incidents: Findings

This section summarizes key findings from 21CP’s review of the individual officer-involved shootings and Level 2 force incidents identified in Section I-B, above.

¹⁷ United States Census Bureau, Quick Facts, Anchorage Municipality, Alaska, <https://www.census.gov/quickfacts/fact/table/anchoragealaska/PST045224> (last accessed Feb. 13, 2026).

¹⁸ *Id.*

¹⁹ Operational Procedure 3.05.020, “Reporting and Investigating Force” at § I-A-2 (last rev. Jan. 12, 2024).

²⁰ *Id.* at § I-A-2-i.

²¹ *Id.* at § I-A-3-d.

- **Several significant force encounters involved individuals who APD officers either knew was experiencing mental illness, suspected based on actions and behavior was likely experiencing a behavioral health crisis, or that a reasonable officer under the circumstances would have suspected was having a behavioral health crisis.**

Consistent with findings from APD's aggregate use of force data, it appears that a noteworthy portion of subjects involved in officer-involved shooting incidents involved subjects that APD officers knew, or that a reasonable officer at least would have strongly suspected, was experiencing a behavioral health crisis. For example, one officer-involved shooting involved APD officers responding to a location where they had responded the previously day and were requested to search for the involved subject – who ultimately approached APD officers with a firearm – who had reportedly not been taking his mental health medication. Another incident involved officers responding to a call of a possibly intoxicated man walking through a neighborhood while waving a handgun and firing a shot. In a separate incident, APD officers responded to a call regarding “a man with a samurai sword” at a church. The subject told officers that he was having a mental health crisis. Although officers threatened to use less-lethal force, the subject was taken into custody after a brief, low-level physical struggle. In another Level 2 force incident, an officer responded to a call regarding a man screaming and threatening people with scissors. In interactions with APD officers, the subject was noncompliant and ran toward officers in a threatening manner. Ultimately, officers deployed a 40mm launcher, striking the subject in the leg and allowing the subject to be taken into custody.

- **Multiple significant force encounters appear to involve a fleeing subject or a subject who officers appeared to believe posed a significant risk of flight.** Several reviewed force incidents involved either a fleeing subject who APD officers pursued or a subject about whom officers appeared to have a belief or fear would flee. 21CP notes that, even where the pursuit of a subject was necessary and reasonable, it appears that circumstances where flight or the possibility of flight is implicated may heighten the likelihood that APD personnel use force.

For example, in one officer-involved shooting, officers responded to a call regarding subjects reportedly hiding from another individual who was armed with a gun on a bicycle. After an individual pointed out the individual, officers caught up with the subject, with an officer positioning his vehicle to block the path of the subject on the bicycle. When the subject pointed a handgun at the officers and fired his handgun, an officer returned fire; when the subject fired twice more, the same officer again returned fire. The deployment of firearm rounds was necessary, proportional, and reasonable in light of the lethal threat that the subject posed to the APD officers. At the same time, the advance knowledge that the individual on the bicycle was armed made the positioning of officers in pursuit, and the tactics that they deployed, especially important.

In a Level 2 incident, officers conducted an investigative stop of an individual observed slumped over the steering wheel of a vehicle. The subject became argumentative while exiting the vehicle before then fleeing on foot. Officers chased the subject and tackled him. The subject struck officers multiple times with his hands and feet; officers struck the subject with a closed fist to the jaw and utilized a cross-face tactic.

In another officer-involved shooting, officers responded to a call of a possibly intoxicated subject walking through a neighborhood while waving a handgun and firing a shot. Upon encountering a subject, the subject turned from officers, appeared to tuck something into the front of his pants near the waistline, and ran from the officers. APD officers deployed a canine, which caught up with the subject and bit the subject. As officers approached the subject, who was on the ground and struggling with the canine, they observed the subject pull a handgun from his waistband. Three officers simultaneously fired their patrol rifles. In this situation, officers closed the distance between themselves and the subject as he struggled with the canine on the ground; especially with indications that the subject might be armed, different tactical commands and the use of cover or distance would have been warranted given that the canine had made contact with and temporarily secured the subject. At the same time, another individual who had emerged near a brick wall when officers encountered the primary subject also fled, with APD officers splitting up and leaving one APD officer to detain the other individual – who was later found to be also armed with a firearm, as well.

- **In some instances, involving individuals who were not in possession of a firearm, officers elected to bypass the strategic use of distance, cover, and concealment when interacting with such subjects** – which would have enhanced their safety and may have facilitated the use of other, less-lethal force options.

For instance, in an officer-involved shooting, a subject who officers, responding to a call of an attempted stabbing, approached after entering an apartment stood up and faced officers holding a kitchen knife. Officers ordered the subject to drop the knife. One officer fired his handgun at the same time that another officer discharged a 40-mm less-lethal munition. The subject was struck by gunfire, was transported to a medical facility, and pronounced deceased.

In a different case, officers responding to a domestic violence call were met by a relative of a subject who indicated that they were struck in the face by the subject. The subject was located in a hallway drinking from a bottle. The officers engaged with the subject and attempted to have him put down the bottle, but the subject told officers that he intended to fight them. The subject is shown on body-worn camera footage striking an officer and breaking the officer's glasses. Both responding officers tackled the subject and took him into custody without further incident. The subject is shown on body worn camera footage striking an officer and breaking the officer's glasses. Even as the specific force used was necessary, proportional, and reasonable, the abandonment and affirmative closing of distance under these circumstances could have placed officers at an elevated risk.

Especially in instances where an individual does not have a firearm, officers can apply a dynamic, critical decision-making model to consider what techniques or tools might ensure their and public safety while promoting subject compliance. Indeed, initiatives such as the Police Executive Research Forum's ICAT training have been specifically "designed . . . for those situations in which someone is acting erratically or aggressively, but is unarmed or armed with a weapon other than a firearm (knife, baseball bat, etc.)."²² 21CP's forthcoming recommendations will consider this and other mechanisms

²² Police Executive Research Forum, *Implementing the ICAT Training Program at Your Agency* 4 (May 2023), <https://www.policeforum.org/assets/ICATImplementation.pdf>.

geared toward giving officers ongoing training and professional skill development opportunities relating to use of force decision-making.

- **Instances where APD officers do not appear to have formulated, communicated, or dynamically modified strong team tactics may make the use of more significant force more likely.** Based on 21CP’s review of use of force incidents, it appears that APD could enhance its training on team tactics and tactical communication skills during use of force incidents. Although it is certainly not possible or reasonable in every instance, in multiple reviewed cases, communication among on-scene APD personnel was not as clear or dynamic as it should have been – leaving officers to respond and react without communicated plans.

For example, in an officer-involved shooting involving a subject with a kitchen knife, one involved officer fired his firearm at the subject at the same time that another officer discharged his 40-mm, less-lethal munition. Evidence indicates that officers did not sufficiently coordinate their response in a manner that might enable involved personnel to determine whether the application of the less-lethal munition might inspire the subject to comply with commands to drop the weapon or otherwise allow officers an opportunity to more safely approach and gain control of the subject.

In another officer-involved shooting, a subject exited an apartment building holding a pistol grip shotgun and proceeded toward officers. After the subject refused to comply with commands to stop and drop the weapon and proceeded down a staircase toward officers while still holding the shotgun, APD officers fired at the subject. This included a K-9 officer, who discharged his firearm at the subject while holding onto his K-9, and an on-scene supervisor also fired his firearm during the incident. Although the use of force was not necessarily inappropriate, the incident suggests that greater clarity about the roles of assembled personnel would be useful – including express policy indication that K-9 officers generally should not have the role of lethal cover.

- **APD’s use of (a) vehicle tactics, including blocking, boxing in, and/or pinning, and (b) the PIT maneuver, occur with some frequency and may place officers, the public, and subjects at a higher risk than alternative high-risk vehicle encounter tactics might.**

Available APD policy and operational documents are imprecise regarding when the application of a vehicle tactic or technique is or is not, by itself, a use of force. Policy 3.05.020 defines a weapon as “[a]ny instrument, article or substance, including a vehicle, which, under the circumstances in which it is used, attempted to be used, or threatened to be used, is readily capable of causing death or other bodily injury.”²³ Level 2 force includes the use of “[a]ny impact weapon to strike a subject where contact is made regardless of injury,” which potentially could implicate instances where an officer strikes a subject’s vehicle but would not address instances where a subject’s vehicle strikes an officer’s car. Regardless, the January 15, 2025 Operational Memorandum involving the Force Review Board memorializes that, among other “generally Level 2” incidents, the Board will review “[a]ny vehicle

²³ Operational Procedure 3.05.020, “Reporting and Investigating Force” at 4 (last rev. Jan. 12, 2024).

tactic resulting in injury requiring medical treatment (beyond first aid) or vehicle damage (beyond minor scuffs or paint transfer).”²⁴

As reiterated in Part II, below, 21CP recommends that Department policy be updated to ensure greater clarity as to what use of a vehicle constitutes a use of force, and it likely is sensible to consider the application of vehicle techniques such as pinning, blocking, ramming, and/or the PIT maneuver as a reportable use of force given that they entail a Fourth Amendment seizure via “a governmental termination of freedom of movement through means intentionally applied.”²⁵ The following sections, however, summarize the nature of the trends that the 21CP team identified with respect to vehicle tactics and techniques.

- **A number of force cases appear to involve the use of vehicle pinning, blocking, and related vehicle tactics that can place officers at an elevated risk of harm.** In a number of reviewed force incidents, the involved APD officer(s) endeavored to block or pin a subject’s vehicle with their APD vehicle. This included instances in which the officer either knew or reasonably believed that the subject was likely in possession of a firearm or may pose a threat to officers.

For example, in one Level 2 incident, an APD officer conducted a vehicle pin/block of a subject’s vehicle. The subject was believed to be involved in verbal threats and the use of a firearm. As the patrol unit attempted to block the subject vehicle’s path, the subject attempted to ram the APD vehicle. Ultimately, the subject fled on foot and was tackled by officers. However, the officer placing his patrol unit to the front of the subject’s vehicle exposed himself to a heightened degree of risk from a subject who was potentially armed with a firearm.

In a different incident, an officer observed a reported stolen vehicle, and additional APD units responded to assist. Officers in multiple vehicles attempted to surround the stolen vehicle as it entered a gas station parking lot. The subject engaged in evasive maneuvers, and two officers pinned the subject’s vehicle with their patrol units. Even as the estimated highest speed of the units was 11 mph and no other force beyond patrol vehicles was used, there appeared to not be any discussion among involved officers, or by post-incident APD reviewers, about whether more typical high-risk vehicle stops could have been just as effective and potentially safer than the pinning tactic deployed.

In another case, officers were engaged in a warrant service. Officers observed a subject – who they recognized from previous encounters and who was known for fighting and eluding police – inside a vehicle. Purportedly based on the subject’s history with police, officers positioned their vehicles to block the vehicle in which the subject was located

²⁴ Captain Jack Caron, Memorandum re: Force Review Board Update at 2 (Jan. 15, 2025).

²⁵ *Brower v. County of Inyo*, 489 U.S. 593, 596–97 (1989); see *Scott v. Harris*, 550 U.S. 372 (2007) (indicating that a police officer’s use of a vehicle technique to terminate a pursuit is properly considered a Fourth Amendment seizure subject to the objective reasonableness inquiry).

to prevent the subject from fleeing. Even as the subject was taken into custody without incident or additional force, the incident suggests that at least some APD officers may view vehicle blocking as a preferred vehicle maneuver even in reasonably high-risk encounters.

21CP observes that the use of the pinning/boxing tactics also did not appear to be substantially effective in preventing the subject officers from resisting, by ramming their vehicle into APD vehicles, or by fleeing. APD personnel told 21CP that the use of pinning/boxing tactics often stems from the premise that APD needs to apprehend individuals who have been, are, or are about to engage in criminal activity – and that, because the Department’s vehicle pursuit policy imposes some restrictions on whether and how officers may pursue in order to ensure public and officer safety, officers need to do something more affirmative, like blocking or pinning, in order to bring the subject into custody. The Department pointed specifically to community concerns in the past about vehicle thefts and indicated that, because vehicle theft by itself is not a felony person crime and rarely involves imminent threats to the public, a vehicle pursuit would not be authorized in order to bring an offender into custody. Thus, if APD officers did not block or pin a subject vehicle, that vehicle might speed away, and officers may not be able to safely and effectively initiate a pursuit.

21CP notes here simply, consistent with its charge to identify factors that may be contributing to the use of force (including force that is lawful, necessary, and appropriate under the circumstances), that the manner by which officers apply pinning and boxing techniques may be elevating the risk to officers and increasing the likelihood that officers may need to use force.

- **In a few incidents, APD officers applied the PIT maneuver in circumstances that may have placed officers and bystanders at an elevated level of risk that was not aligned with the nature of the underlying threat posed by the subject.**

The “PIT maneuver,” which is short for the Precision Immobilization Technique, is a vehicle intervention technique that “is performed by intentionally nudging the pursued vehicle sideways,”²⁶ which “causes the target vehicle’s tires to break traction and the rear to spin away from the officer’s vehicle” and results in “the target vehicle...com[ing] to rest pointing 180 degrees from the original direction of travel.”²⁷ The PIT was introduced in American policing in the 1980s as a tactical approach that uses physics

²⁶ Jing Zhou, et al, *Vehicle Dynamics in Response to the Maneuver of Precision Immobilization Technique* (ASME Dynamic Systems and Control Conference 2008), available at <https://jianbolu.tripod.com/paper/DSCC2008-2183.pdf> (last accessed Oct. 17, 2025).

²⁷ Tim Dees, “How Police Use the PIT Maneuver to End Vehicle Pursuits,” *Police1.com* (Dec. 28, 2021), <https://www.police1.com/suspect-pursuit/articles/how-police-use-the-pit-maneuver-to-end-vehicle-pursuits-fZP3HtT386Mpu5oF/>.

and officer training to make targeted vehicle contact a potential way of ending a vehicle pursuit.

The use of the PIT maneuver has been the source of some concern and controversy.²⁸ Traditionally, this has been because, “[a]t higher speeds, the combined effects of spinning and skidding after the maneuver is more pronounced,”²⁹ placing both bystanders and involved officers at greater risk. Recently, however, the continued viability of the PIT has been called into question by the “introduction of Electronic Stability Control (ESC) systems” on vehicles – equipment required “in new cars [since] 2012” that “proactively help[s] drivers maintain control of their vehicles in situations where the vehicles is beginning to lose directional stability.”³⁰ “The research [has] found that conducting the PIT maneuver on cars with stability systems could have unpredictable results at both low and high speeds, a situation that does not exist without stability control systems.”³¹

Part II of this report more specifically considers APD’s policies on pursuits and vehicle tactics. We highlight the dynamic here as one that appears across multiple force encounters and that, combined with APD’s use of boxing and pinning cars, appears to result in a notable number of reportable force encounters. Here, as with the application of pinning or boxing techniques, the more systematic consideration and deployment, where appropriate, of other tactics and resources rather than active vehicular intervention might facilitate the same public safety outcomes while reducing risk to officers and minimizing the likelihood that a force incident will occur.

In one incident, an officer observed a car traveling on the wrong side of the roadway. In-car camera footage shows the suspect’s car swerving across the dividing line into oncoming traffic. The officer pursued the suspect’s car as it made a right turn onto another roadway, making another U-turn, and proceeding approximately one block. The officer then deployed the PIT maneuver. It failed, causing the suspect to lose control of the car and strike the median. However, the suspect regained control of the car. The officer attempted another PIT maneuver, causing the subject to lose control of the car and crash into a utility pole. The driver jumped out of the car and fled.

²⁸ Shaun Raviv, “Fast, Precise, and Deadly: How Police Use a Dangerous Anti-Terrorism Tactic to End Pursuits,” *The Intercept* (Feb. 11, 2016), <https://theintercept.com/2016/02/11/pit-maneuver-how-police-use-anti-terrorism-tactic-to-end-pursuits/>; see also Tim Dees, “How Police Use the PIT Maneuver to End Vehicle Pursuits,” *Police1.com* (Dec. 28, 2021), <https://www.police1.com/suspect-pursuit/articles/how-police-use-the-pit-maneuver-to-end-vehicle-pursuits-fZP3HtT386Mpu5oF/>; Andrew Wolfson, “Kentucky Police Use tactic to Stop Fleeing Drivers that Has Caused 30 Deaths Nationwide,” *Louisville Courier Journal* (Jan. 29, 2021).

²⁹ Jing Zhou, et al, *Vehicle Dynamics in Response to the Maneuver of Precision Immobilization Technique 6* (ASME Dynamic Systems and Control Conference 2008), available at <https://jianbolu.tripod.com/paper/DSCC2008-2183.pdf> (last accessed Oct. 17, 2025).

³⁰ Pete Tortorell, et al, “Effects of Electronic Stability Control (ESC) on the Precision Immobilization Technique (PIT),” *Police Chief*, <https://www.policechiefmagazine.org/effects-esc-pit/> (last visited Oct. 15, 2025).

³¹ Becky Lewis, National Institute of Justice, “Studying How to Maneuver Suspects to a Stop,” *Tech Beat* (Apr. 2013).

Although there was no additional traffic on the street during the PIT applications, the use of the PIT maneuver on a commercial roadway can introduce a substantially elevated risk.

In a separate encounter, an officer attempted a traffic stop of a vehicle believed to have previously eluded officers twice earlier. The vehicle fled. The officer applied the PIT maneuver in an empty parking lot on the grounds that the subject posed a risk to public safety if allowed access to the public street. Although the subject was taken into custody and there were no injuries to the subject, officers, or bystanders, the incident does raise the question of whether traditional high-risk vehicle stop tactics (*e.g.*, police units fanning out behind the subject vehicle) might be equivalently effective and pose less risk.

Additionally, in discussions with APD personnel, the topic of the parameters for the use of the PIT referenced a speed constraint of 45 mph. Noting the urban environment involving other motor vehicles, the potential for cross traffic and pedestrian presence, a question arises as to whether a lower maximum speed should be employed to reduce the risk to the public, the pursuing officer, and subjects.

Part II. Recommendations

Part I of this report described findings from 21CP’s review of aggregate APD use of force data and of specific use of force incidents in Phase 1 of its engagement. In Phase 2, 21CP was asked to consider APD policies, training, and other use-of-force-related practices, and to make recommendations for improvements and enhancements. Therefore, this Part of the report describes 21CP’s specific recommendations to APD relating to use of force based both (1) on the preceding discussion of attributes, features, and dynamics that have been historically related to the use of force, and (2) 21CP’s review of APD policy, procedure, processes, training, and other practices relating to use of force that it conducted in Phase 2 of its engagement.

During Phase 2 of the engagement, 21CP examined an array of written materials relating to APD’s use of force practices. This included a review of APD policies, procedures, manuals, memoranda, and other written materials relating to the use of force and the Department’s administrative response to force incidents. It should be noted that APD made available to 21CP the working drafts of policy updates that the Department was contemplating as of late 2025. Consequently, this report distinguishes between “current” APD policy and “proposed revisions” by APD to existing policies that had not been finalized or made effective at the time of 21CP’s review.

21CP’s review also included written curricula, instructor guides, PowerPoint slides, and other written materials relating to both in-service and Academy training provided to officers at any point between January 1, 2021 and June 30, 2025.

Understanding that, in any organization, there may be critical differences between performance expectations on paper and operations in the real world, 21CP conducted a set of interviews and focus groups with APD personnel and Anchorage stakeholders. A good deal of engagement occurred in-person in August 2025, with additional engagement occurring via videoconference in September and October. Some stakeholders were interviewed alone, or with a small number of other personnel with similar assignments, by multiple 21CP representatives about their work, experiences, and views. 21CP also convened larger focus groups of several APD personnel, which were facilitated by multiple members of the 21CP project team.

Additionally, 21CP sought to engage with the community beyond APD to understand the history, concerns, values, and expectations that individuals who live and work in Anchorage have about use of force issues. At the outset, 21CP asked the Municipality and APD for recommendations about Anchorage community members who might be useful to engage. To the Municipality and APD’s credit, the individuals identified reflected a diverse set of views, including those that were critical of the Department. 21CP also asked a number of these initially-engaged stakeholders for the names of additional community members with whom it might be willing to engage.

Across all interviews, focus groups, and conversations, participants were assured that their participation was voluntary and confidential – and that, although 21CP might characterize or quote various aspects of their comments, their names and identities would not be disclosed. Meetings were not recorded.

Although it appears that APD personnel were encouraged to speak with us, personnel were not strictly mandated to speak with us – making participation voluntary and self-selecting. Because participants were not randomly selected, the views of participants in our stakeholder engagement may or may not reflect all sworn personnel, all civilian personnel, or APD as a whole. Likewise, although 21CP held a number of focus groups and interviews, our

approach did not endeavor to include a statistically significant number of Department stakeholders. As a result, it is likely that some important views did not surface in our engagement simply because of the number and nature of the individuals with whom we spoke.

Because of resource parameters, 21CP's bandwidth for community engagement was limited. As with its engagement with APD personnel, the non-random, voluntary participation of selected community participants makes it likely that some viewpoints were not represented among community participants. The 21CP project team and this report therefore do not assume that the views expressed by community participants wholly reflected the views of the Anchorage population overall.

Nevertheless, among those with whom 21CP did speak, common issues, suggestions, concerns, and experiences emerged. In describing recurring themes and areas of feedback, this report cites, characterizes, and sometimes quotes stakeholder participants from our focus groups, interviews, and interactions. To ensure candid discussions and preserve the confidentiality of participants who sometimes shared sensitive information or experiences, 21CP did not record the identities of who said what during focus groups and interviews. General information pertaining to rank, assignment, or affiliation was recorded for context along with the specific content of what participants said. Therefore, this report refers to specific stakeholders in generic ways (e.g., "an officer," "an APD supervisor," "an Anchorage leader," and "a community member").

21CP also considered prior outside reports and consultant recommendations that relate to use of force issues. This included APD's Officer-Involved Shooting Review, the Certus Report, and the Darcy Report:

- The APD Officer-Involved Shooting Review was an internal review that considered 45 officer-involved shootings that occurred across 15 years to identify trends among incidents, as well as related policy and training recommendations.³² Significant recommendations including an increased emphasis on team tactics, less-lethal instruments, on-scene leadership, and ensuring adequate tools and resources are appropriately utilized in the field.³³
- The Certus Report was a staffing study completed in December 2024 by the Certus Public Safety Solutions firm for the purpose of determining how many of what type of personnel the Department needs in order to meet public safety demand and for personnel to fulfill their roles and responsibilities.³⁴
- The Darcy Report was a review, conducted by Christopher Darcy of the Fairfax Consulting Group, of an officer-involved shooting of Easter Leafa by APD officers. The report made a variety of recommendations relating to topics including, but not limited to, de-escalation, cultural competence, policy changes, and leadership and supervision.³⁵

³² Anchorage Police Department, *Officer-Involved Shooting Review 2009-2023 2* (2024).

³³ *Id.*

³⁴ Certus Public Safety Solutions, *Anchorage Police Department (APD) Department Staffing Study* (Dec. 2024).

³⁵ Christopher Darcy, "Critical Incident Review – OIS Response Review and Recommendations" at 1–4 (Dec. 6, 2024).

APD and the Municipality asked 21CP to develop specific, actionable recommendations that might enhance safety and optimize the outcomes of police interactions that result in use of force or involve features that might lead to the use of force. All of the recommendations contained below are grounded specifically in 21CP's review of APD data; force incidents; force-related policies and documentation; and engagement with APD, Anchorage, and community stakeholders. However, APD is not alone in encountering the topics that this report addresses. 21CP has conducted similar reviews for other agencies and jurisdictions focusing on the same issues and topics. Given the common challenges that communities and police departments face when it comes to deploying force, some of the recommendations that 21CP proposes are similar to those that it has made to other jurisdictions. Indeed, some portions of this report advance recommendations or discuss the logic and rationale for those recommendations using the same language, examples, discussions, and/or citations as other reports that 21CP prepared for other communities or in other contexts. Often, the reason is that we found Anchorage to be facing a similar issue or opportunity and a need to highlight the same, current best or promising practices as an approach that might address that issue. Nevertheless, even where this report makes the same or similar recommendations to those that may apply to other departments or communities, the specific dynamics and needs of APD and the Anchorage community are the focus and foundation of all of this report's recommendations.

Relatedly, this section of the report includes examples of specific policy language from other law enforcement agencies that align with various recommendations. These examples are provided to demonstrate the approach of other these other agencies with respect to the quoted material and is not intended as, nor should be read as, an endorsement of that agency's overall policy, approach, or performance when it comes to use of force.

Additionally, the fact that 21CP makes a specific recommendation does not necessarily mean that APD's performance has revealed problems or issues in the area. Some suggestions aim to keep the Department "ahead of the curve" and consistent with best practices and sound approaches so that the Department does not develop issues or problems. Therefore, although some recommendations relate specifically to trends or dynamics identified within actual performance, other recommendations are provided with an eye toward preventing issues from arising.

Further, especially for policy changes, 21CP's recommendations chart a direction that it believes that APD will benefit from going. For many recommendations, it is likely that there are several different approaches in terms of changes to specific policy language or particular provisions that could meaningfully implement the recommendation. This document intentionally leaves it to APD to determine what policy language, process enhancements, data mechanisms, and other details may work best.

Finally, in discussions with APD and Anchorage stakeholders, 21CP confirmed that a number of 21CP's recommendations suggest that APD policy use strong and clear language (*i.e.*, "shall," "will," "must") when it is setting a general performance expectation to which it expects that personnel will adhere. That language helps to establish clear, affirmative duties in agency policy. Weaker language, such as "should," can then be reserved for instances when APD policy is communicating a performance standard to which officers are encouraged to comply but that does not rise to the level of import, or broad-based applicability, as an affirmative performance expectation.

A. Officer Use of Force

1. Policy

Recommendation 1. APD should continue to revise, update, and enhance its use of force policies to ensure that it provides personnel with streamlined, focused, and pragmatic guidance on officer use of force and use of force decision-making in the field.

Overall, the August 2024 version of APD’s primary use of force policy (3.05.025, “Response to Resistance”), which is the version that was effective in the field during 21CP’s engagement, is better than the policies of many other agencies – closely aligning with an array of national model policies, best-practice guidance, and best-in-class agency policies from across the country. In its inclusion of provisions such as those requiring all force to be necessary, prohibiting warning shots, its treatment of reasonableness, and its focus on de-escalation, APD’s policies already reflect a number of critical best practices. Even as the remainder of this section focuses on ways to further enhance and strengthen the use of force policy, we agree with APD Union representatives who told 21CP that “what we have now is a good [use of force] policy.” Draft updates provided to 21CP by APD promise, by and large, to further strengthen these use of force policies.

One theme that emerged in 21CP’s engagement with APD personnel was the idea that Department personnel want and/or need policies with maximum clarity and specificity. As one senior APD officer explained, “Our group of officers does not seem to be handle gray very well, which means we are going back to square one with the policies because it’s going [to have] to be very prescribed.”³⁶ Indeed, many of the recommendations that follow focus on strengthening clarity and specificity to ensure common understandings and set common performance expectations.

Recommendation 1.1. APD should consider streamlining and focusing its core use of force policy to maximize clarity, understanding, and utility for officers and supervisors.

The organization and flow of the primary use of force policy (3.05.025, “Response to Resistance”) suggests that it has been revised, updated, and enhanced at various periods primarily through addition (new sections, clarifying sentences, etc.) rather than streamlining, synthesizing, or paring back materials. The practical effect is that, in a number of instances, the same content or performance expectation is covered in several different parts of the policy using subtly different language. Although there are no instances where policy language is directly contradictory, this repetition (a) risks making the policy seem more complicated to officers than it in fact is, and (b) may complicate the force investigation, review, misconduct adjudication, and discipline imposition process if the same conduct is covered by several different policy parameters that address substantially the same consideration using some variations in language.

For example:

- Section I, entitled “Use of Force Standards,” which appears deep into the current Response to Resistance policy, describes objective reasonableness and the Supreme Court’s articulation of the

³⁶ Interview with APD Personnel (Aug. 25, 2025).

concept in *Graham v. Connor*. However, Section E has already, if incompletely, described reasonableness and detailed the factors that enter into the reasonableness inquiry.³⁷ Similarly, despite Section D (“De-Escalation and Mitigation”) describing de-escalation and listing nine types of de-escalation tactics –Section I also re-articulates the importance of de-escalation, without using those terms and situating it, instead, as “[t]actical withdrawal . . . [d]isengagement, area containment surveillance, patients [sic], summoning reinforcements, or calling in specialized units.”³⁸

- The very substantive policy provision addresses the use of verbal warnings.³⁹ After a separate section addressing “Use of Force Authorization and Limitations,”⁴⁰ the policy includes a separate section on “Verbal Warning.”⁴¹ The requirement that officers give warnings before use of deadly force when feasible is then covered again in another section on Deadly Force.⁴² (The topic of verbal warnings is addressed in greater substantive detail within the discussion of Recommendation 1.4, below.)
- Section B (“Use of Force Authorization and Limitations”) notes, among other provisions, that officers may use “only the amount of force necessary to accomplish lawful objectives.”⁴³ Section E states the same obligation (“Physical force may only be used to achieve a lawful purpose”) within a larger discussion of force needing to be “necessary, and reasonable to the threat encountered.”⁴⁴

Draft policies that APD shared with 21CP address some of these examples and use the process to streamline the organization of the policy, as well. As the Department finalizes policy changes, it should continue to look for all opportunities to focus and streamline the force policy to ensure maximum clarity, concision, and specificity.

Recommendation 1.2. APD should strengthen existing policy language to include a comprehensive statement of purpose that affirms the sanctity of human life.

Current policy contains, and the Department’s proposed revisions retain, a statement that emphasizes the primary importance of protecting and preserving human life: “The main responsibility of the Officers of the Anchorage Police Department is to protect the life and property of the citizens.”⁴⁵

21CP recommends that, going forward, APD consider articulating an even more express, strong commitment to affirming the sanctity of human life – across the Department’s interactions and as an overriding value and organizational imperative. Often, these statements are included in a department policy section introduction, overall philosophy, or statement of principles – helping to confirm the department’s approach to deploying force and underscoring the rationale for subsequent policy guidelines.

³⁷ Anchorage Police Department, Operational Procedure 3.05.025, “Response to Resistance” at § E (last rev. Aug. 14, 2024).

³⁸ *Id.* at §§ D, I.

³⁹ *Id.* at § A(1).

⁴⁰ *Id.* at § B.

⁴¹ *Id.* at § C.

⁴² Anchorage Police Department, Operational Procedure 3.05.025, “Response to Resistance” at § F (last rev. Aug. 14, 2024).

⁴³ *Id.* at § B.

⁴⁴ *Id.* at § E.

⁴⁵ *Id.* at 1.

- **Baltimore Police Department** – “Sanctity of Human Life. Members shall make every effort to preserve human life in all situations.”⁴⁶
- **San Antonio Police Department** – “The sanctity of human life and individual liberties are fundamental elements of modern society which vests police officers with the responsibility for the preservation and protection of these paramount values.”⁴⁷
- **Mesa, Arizona Police Department** – “The Department’s highest priority is the sanctity of human life. In all aspects of their conduct, Department members will act with the foremost regard for the preservation of life and the safety of all persons involved, human rights, the dignity of every individual, and the Constitution of the United States and the State of Arizona.”⁴⁸
- **Chicago Police Department** – “The Department’s highest priority is the sanctity of human life. The concept of the sanctity of human life is the belief that all human beings are to be perceived and treated as persons of inherent worth and dignity, regardless of race, color, sex, gender identity, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military status, immigration status, homeless status, source of income, credit history, criminal record, criminal history, or incarceration status. Department members will act with the foremost regard for the preservation of human life and the safety of all persons involved.”⁴⁹
- **Las Vegas Metropolitan Police Department** – “It is the policy of this Department that officers hold the highest regard for the dignity and liberty of all persons and place minimal reliance upon the use of force. The Department respects the sanctity of every human life, and the application of deadly force is a measure to be employed in the most extreme circumstances where lesser means of force have failed or could not be reasonably considered.”⁵⁰
- **Philadelphia Police Department** – “It is the policy of the Philadelphia Police Department that officers hold the highest Regard for the sanctity of human life, dignity, and liberty.”⁵¹
- **Milwaukee Police Department** – “It is the policy of the Milwaukee Police Department that members hold the highest regard for the sanctity of human life, dignity, and liberty of all persons.”⁵²

⁴⁶ Baltimore Police Department, Policy 1115, *Use of Force* (last rev. Nov. 24, 2019), <https://public.powerdms.com/BALTIMOREMD/documents/51042>.

⁴⁷ San Antonio Police Department, *General Manual*, Procedure 501, Response to Resistance, <https://www.sanantonio.gov/Portals/0/Files/SAPD/GeneralManual/501.pdf> (last rev. Nov. 1, 2021).

⁴⁸ Mesa Police Department, Department Policy Manual Section 2.1.1, “Use of Force” at § 2.1 (last rev. Apr. 30, 2025), <https://public.powerdms.com/MESAPD/documents/2234408>.

⁴⁹ Chicago Police Department, General Order G03-02, “De-Escalation, Response to Resistance, and Use of Force” at 1 (last rev. June 28, 2023), <https://directives.chicagopolice.org/#directive/public/6214>.

⁵⁰ Las Vegas Metropolitan Police Department, Policy 3.1110 at 2 (last rev. Oct. 2023), <https://www.lvmpd.com/home/showpublisheddocument/5262/638405864015900000>.

⁵¹ Philadelphia Police Department, Directive 10.1 (last rev. Apr. 16, 2021), <https://www.phillypolice.com/wp-content/uploads/2024/11/D10.1-REV-5-13-21-REDACTED.pdf>.

⁵² Milwaukee Police Department, Standard Operating Procedure 460, “Use of Force,” (last rev. Dec. 26, 2025), <https://city.milwaukee.gov/ImageLibrary/Groups/mpdAuthors/SOP/460-USEOFFORCE.pdf>.

21CP recommends that APD prominently situate a commitment to the “sanctity of human life” in its force policies and training. As the Police Executive Research Forum (PERF) recommends, “[a]gency mission statements, policies, and training curricula should emphasize the sanctity of all human life—the general public, police officers, and criminal suspects”⁵³

The term “sanctity” communicates something profound, sacred, and deserving of respect and honor, and it is stronger and more impactful than similar language involving the “preservation of life.” In discussions with some APD officers, many agreed that the concept already “underpins what we do . . . I don’t know if it’s written, but it’s part of our values . . . as a Department.”⁵⁴

However, to the extent that some APD personnel or community members might see “sanctity” of human life as a political buzzword, it is less the specific phraseology that matters so long as the importance and the maintenance of life is articulated as a core, overriding commitment of the Department that directly informs its performance requirements on use of force. A strong statement that the Department is committed to the “preservation of life” across encounters may likely communicate a similar overall approach as one emphasizing the “sanctity of human life”:

- **Alexandria, Virginia Police Department** – “This Department’s policy and primary value is the preservation of human life. Sworn and appointed law enforcement personnel are responsible to protect life and property and to apprehend criminal offenders, but the protection of life (including the employee’s) must always take priority.”⁵⁵
- **Los Angeles County Sheriff’s Department** – “[A]ll members shall view their duties in the context of safety for themselves and others, with an emphasis on respect, professionalism, and reverence for human life, even when force is necessary.”⁵⁶

Recommendation 1.3. Although existing APD policy meaningfully addresses de-escalation, APD should affirmatively require that officers employ de-escalation strategies, tactics, and techniques whenever safe and feasible to do so under the circumstances.

Current policy appropriately emphasizes the importance of de-escalation – but indicates only that officers *should* use de-escalation tactics:

⁵³ Police Executive Research Forum, *Guiding Principles on Use of Force* 34 (Mar. 2016), <https://www.policeforum.org/assets/guidingprinciples1.pdf>.

⁵⁴ Focus Group with APD Stakeholders (Aug. 26, 2025).

⁵⁵ Alexandria Police Department, Directive 10.32, Use of Force §10.32.01 (last rev. June 17, 2020), <https://media.alexandriava.gov/docs-archives/police/directives/policedirective1032public.pdf>.

⁵⁶ Los Angeles County Sheriff’s Department, Manual of Policy and Procedures, Chapter 10 – Force Policy, Section 3-10/000.00, https://lasd.org/wp-content/uploads/2023/11/LASD_MPP_Manual_of_Policy_and_Procedures_Chapter_10_Force_Policy_11292023.pdf (last accessed Jan. 19, 2026).

Officers should employ de-escalation and mitigation techniques to the greatest extent practicable. Officers are not required to delay taking protective measures that are immediately necessary or to place themselves or others at imminent risk of harm in order to attempt, de-escalation, but they should consider” nine listed “options that might minimize or avoid the use of force” including strategic communication skills, “[s]lowing down the pace of an incident,” “[w]aiting,” “[p]lacing additional space or barriers between the officer and a person,” “[t]actical repositioning or seeking cover,” and “[r]equesting additional resources.”⁵⁷

Many police agencies have transitioned to articulating de-escalation as a fundamental duty whenever it is safe and feasible under the circumstances – not merely something that officers “should attempt” but something that they *must* or *shall* do whenever the circumstances allow.

- **Seattle Police Department** – “When safe, feasible, and without compromising law enforcement priorities, officers shall use de-escalation tactics in order to reduce the need for force.”⁵⁸
- **Los Angeles Police Department** – “It is the policy of this Department that, whenever feasible, officers shall use techniques and tools consistent with Department de-escalation training to reduce the intensity of any encounter with a suspect and enable an officer to have additional options to mitigate the need to use a higher level of force while maintaining control of the situation.”⁵⁹
- **Honolulu Police Department** – “When practicable and reasonable, officers shall use de-escalation concepts (e.g., additional time, space, and resources, etc.) to minimize the need for force.”⁶⁰

Indeed, best-practice guidance from national policing organizations and experts also points toward agencies identifying that officers have an affirmative obligation to use de-escalation tactics, techniques, and strategies whenever safe and feasible under the circumstances:

- **IACP National Consensus Policy on Use of Force** – “An officer shall use de-escalation techniques and other alternatives to higher levels of force consistent with his or her training wherever possible and appropriate before resorting to force and to reduce the need for force.”⁶¹
- **American Law Institute Principles of the Law: Policing** – “Agencies should require, through written policy, that officers actively seek to avoid using force whenever possible and appropriate by employing techniques such as de-escalation.”⁶²

⁵⁷ Anchorage Police Department, Operational Procedure 3.05.025 at D “Response to Resistance” at 1 (last rev. Aug. 14, 2024); see also *id.* at 3.05.025 at A(3).

⁵⁸ Seattle Police Department Manual, Section 8.100: De-Escalation (rev. Apr. 5, 2021), <https://public.powerdms.com/Sea4550/tree/documents/2042943>.

⁵⁹ Los Angeles Police Department Manual Section 1/556.10, “Policy on the Use of Force”(June 29, 2020), <https://www.lapdonline.org/newsroom/policy-on-the-use-of-force-revised/>.

⁶⁰ Honolulu Police Department, “Use of Force,” <https://www.honoluluupd.org/policy/policy-use-of-force/> (last accessed Jan. 19, 2026).

⁶¹ International Association of Chiefs of Police, National Consensus Policy and Discussion Paper on Use of Force 3.

⁶² *Principles of the Law: Policing* § 7.04 (Am. Law. Inst. Jan. 2023), available at <https://www.policingprinciples.org/chapter-7/7-04-de-escalation-and-force-avoidance/>.

Ultimately, providing that officers “shall,” “must,” or “will” de-escalate whenever it is safe and feasible to do so under the circumstances clarifies that de-escalation is an affirmative duty of all officers in all situations.

To be clear, 21CP encountered consistent evidence that APD officers are exhibiting de-escalation skills in many interactions. Across interviews with APD personnel of all ranks, participants volunteered thoughts about the importance of de-escalation and using strategies and techniques to minimize the need to use force. Additionally, even as officers are regularly looking to de-escalate situations, de-escalation tactics are not safe and feasible under every set of circumstances due to the nature of the subject’s threat or resistance. As an Anchorage stakeholder emphasized to 21CP, “The reality is that our community is armed to the teeth . . . so when people are waving guns around, standing in the middle of traffic, potentially about to shoot into a busy road,” de-escalation may not be an option.⁶³

A clear statement that officers must de-escalate whenever safe and feasible under the circumstances does not run counter to these observations that many APD officers already are de-escalating and that de-escalation is not feasible in every circumstances. Indeed, an affirmative duty to de-escalate when safe and feasible recognizes those dynamics while emphasizing the foundational importance of using strategies and techniques that might avoid force or minimize the severity of force that must be deployed.

Recommendation 1.4. Although APD policy addresses the topic of verbal warnings, its coverage of verbal warnings before the deployment of less-than-lethal and deadly force should be streamlined; could be more strongly and clearly worded; and could be clearer about exceptions to the general rule that officers provide a verbal warning before using force whenever safe and reasonable under the circumstances.

Generally, “[o]fficers should provide clear instructions and warnings whenever feasible before using force.”⁶⁴ Many law enforcement agencies require officers to provide a warning, whenever feasible, before any force is used – whether lethal force, a less-lethal instrument, or lower-level physical or personal force. For example:

- **Cleveland Division of Police** – “When feasible, and to do so would not increase the danger to officers or others, officers shall issue a verbal warning to submit to their authority prior to the use of force.”⁶⁵
- **Northampton, Massachusetts Police Department** – “When tactically feasible, an officer will identify themselves as a police officer and issue verbal commands and warnings prior to the use of force. When feasible, an officer will allow the subject an opportunity to comply with the officer’s verbal commands. A verbal warning is not required in circumstances where the officer has to make a split[-

⁶³ Interview with Anchorage Stakeholder (Oct. 8, 2025).

⁶⁴ *Principles of the Law: Policing* § 7.06 (Am. Law. Inst. Jan. 2023), available at <https://www.policingprinciples.org/chapter-7/7-06-instructions-and-warnings/>; accord The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 134 (2019) (“Departments should ensure that officers . . . identify themselves as officers . . . and give verbal warnings before use.”).

⁶⁵ Cleveland Division of Police, Use of Force: General (last rev. Mar. 20, 2023), <https://www.clevelandohio.gov/sites/clevelandohio/files/policies-procedures/2.01.03%20Use%20of%20Force%20-%20General.pdf>.

]second decision, or if the officer reasonably believes that issuing the warning would place the safety of the officer or others in jeopardy.”⁶⁶

The duty to warn before using force where feasible stems in part from the Supreme Court’s decision in *Tennessee v. Garner*, which involved lethal force.⁶⁷ However, the rationale for this requirement – that it provides an opportunity for subjects to comply without the need to use force and provides express articulation of an officer’s intent to use force to other on-scene police personnel in a manner that can aid officer coordination and safety – extends easily to the application of *all* types of force. Indeed, providing a warning is often substantially more feasible, and potentially more effective in gaining compliance, in situations involving less-significant force and threats than those involving deadly force and threats.

As discussed briefly in the context of Recommendation 1.1, existing APD policy addresses the provision of warnings to subjects before using force in various places and ways. In a “General” section, the policy appropriately – consistent with best practice – provides that “[o]fficers shall use advisements, warnings, verbal persuasion, and verbal instructions when possible before resorting to force.”⁶⁸ In a later section specifically entitled “Verbal Warning,” the policy provides that:

When tactically feasible, an Officer will identify themselves as a police Officer and issue verbal commands and warnings prior to the use of force . . . A verbal warning is not required in circumstances where the Officer has to make a split-second decision, or if the Officer reasonably believes that issuing the warning would place the safety of the Officer or others in jeopardy.⁶⁹

As written, the different sections addressing verbal warnings use somewhat different language – requiring verbal warnings “when possible” in one instance and “when tactically feasible” (an undefined term and unexplained concept) in another – that may not be meaningful distinctions in many instances but could, under some circumstances, risk confusion either in the field or when seeking to ensure that officers complied with policy subsequent to a force incident. The revised policy draft that APD provided to 21CP to review preserves this language. To this end, the policy would be simpler and stronger by simply requiring that officers provide a verbal warning “*whenever* safe and feasible under the circumstances” rather than “when possible” or “when tactically feasible.”

Therefore, this section on “Verbal Warning” presents exceptions to the general rule that officers issue verbal commands and warnings before using force: (a) when officers must “make a split-second decision,” or (b) when officers “reasonably believe[] that issuing the warning would” constitute a safety risk to officers or others.⁷⁰ Aside from some minor wording changes, the revised policy draft that APD provided to 21CP to review preserved the language and the articulation of these exceptions.

⁶⁶ Northampton (MA) Police Department, AOM Chapter O-101, § II-H, (last rev. Feb. 2021).

⁶⁷ 471 U.S. 1 (1985).

⁶⁸ Anchorage Police Department, Operational Procedure 3.05.025 at A(1) (last rev. Aug. 14, 2024).

⁶⁹ *Id.*

⁷⁰ *Id.*

There are at least two challenges with these exceptions. First, as *Graham v. Connor* famously observed, “police officers are often forced to make split-second judgments”⁷¹ – which risks rendering the verbal warning requirement practically moot across a wide array of instances in which officers are dynamically and critically assessing the right response to ensure law enforcement objectives, officer safety, and public safety. Second, the latter part of the exception situates applicability in terms of what the officer’s warning might do rather than in terms of the subject’s actions and the totality of the circumstances. That is, if the officer reasonably believes that the *issuance of a warning* would place them or others at risk, a warning is not necessary.

The existing policy formulation appropriately engages with the practical consideration that, in some instances, officers will need to act to address urgent threats against themselves and members of the public without first providing a warning. However, 21CP recommends that APD streamline this language to clarify that a verbal warning is not required when an officer reasonably believes that they must take immediate steps to address an imminent threat of harm to officers or others.

Subsequently, in a policy section titled “Consideration for Use of Physical Force,” officers are advised that “[b]efore resorting to physical force and whenever safe and feasible,” they “should first make reasonable attempts to gain compliance through verbal commands and allowing appropriate time under the circumstances for voluntary compliance.”⁷² The latter part of this policy provision is re-stated elsewhere: “When feasible, an Officer will allow the subject an opportunity to comply with the Officer’s verbal commands.”⁷³ As observed in this report’s broader suggestions in Recommendation 1.1, there is opportunity here for APD to streamline and simplify the policy by eliminating nearly-identical policy provisions.

To this end, the requirement to give a warning is re-stated again specifically within the context of deadly force (“Where feasible, the Officer should give warning of the intent to use deadly physical force”⁷⁴) even as the generalized provisions governing verbal warnings would appear to apply, by their terms, to all force, regardless of type – perhaps providing an additional opportunity for streamlining.

The section also provides an example of warnings that are not necessarily warnings that the officer intends to use force: “Police Officer, Stop.”⁷⁵ Updated policy drafts amend this example to “Police Officer, Halt,” but this revised version is not a *verbal warning* of deadly force but is, instead, a *command* for the subject to comply.⁷⁶ 21CP recommends that, to the extent that an example of a warning is provided, that more specific, practical examples of officer warnings about using force are provided.

⁷¹ 490 U.S. 386, 397.

⁷² Anchorage Police Department, Operational Procedure 3.05.025 at *Id.* at § E (last rev. Aug. 14, 2024).

⁷³ *Id.* at § C.

⁷⁴ *Id.* at § F.

⁷⁵ *Id.*

⁷⁶ It appears that the use of this example may be an understandable attempt to faithfully adhere to the Supreme Court’s opinion in *Tennessee v. Garner*. There, the officer in the underlying incident in *Tennessee v. Garner* called out to a fleeing subject “police, halt.” *Id.* at 4. The Court observed that “deadly force may be used if necessary to prevent escape, and if, where feasible, some warning has been given.” *Id.* at 11–12. However, the Court did not specifically opine on the sufficiency of the officer’s warning – in part because it found that “the facts . . . did not justify the use of deadly force” because the involved officer “could not reasonably have believed that [the subject] posed any threat.” *Id.* at 20, 21.

Recommendation 1.5. Even as APD policy appropriately reflects the concept of proportionality, APD policy should use the term and require that officers, considering the totality of the circumstances, use force only when it is proportional to the nature of the threat or resistance posed by a subject under the circumstances.

One foundational requirement for any use of force is that it must be proportional to the nature of a subject's threat or resistance – such that the officer's response is consistent with or corresponds to the significance or gravity of the subject's action. "Proportionality requires that any use of force correspond to the risk of harm the officer encounters, as well as to the seriousness of the legitimate law-enforcement objective that is being served by its use."⁷⁷ In other words, "[p]roportionality requires officers to consider if they are using only the level of force necessary to mitigate the threat, and whether there is another, less injurious option available that will safely and effectively achieve the same objective."⁷⁸ The "requirement of proportionality operates in addition to the requirement of necessity" and "means that even when force is necessary to achieve a legitimate law-enforcement end, its use may be impermissible if the harm it would cause is disproportionate to the end that officers seek to achieve."⁷⁹ It is grounded in the United States Supreme Court's guidance in *Tennessee v. Garner*, affirmed in *Graham v. Connor*, that – for the objective reasonableness inquiry described in further detail in Recommendation 1.6 below – "the question is whether the totality of the circumstances," including the nature of the threat posed by the subject and the level of resistance, "justifie[s] a particular sort of seizure."⁸⁰

Current APD policy describes and reflects the concept of proportionality but does not specifically use the term:

- "[O]fficers shall use only the amount of force necessary and reasonable . . . When force is necessary, the degree of force employed should be in direct relationship to the amount of resistance exerted, or the immediate threat to the Officers or others."⁸¹
- "Members of the Department are authorized to use only the amount of force necessary to accomplish lawful objectives."⁸²
- "Officers shall use only the reasonable amount of force necessary to overcome resistance or accomplish the police task."⁸³

APD's policy therefore seems to acknowledge the importance of the amount or nature of force that an officer uses being consistent with the nature of the circumstances encountered. However, the Department and its officers would be well-served by more expressly and specifically describing the proportionality requirement. As of 2017, over half of the country's fifty largest police departments had a specific proportionality requirement in their use of force policy.⁸⁴ For example:

⁷⁷ *Principles of the Law: Policing* § 7.05 cmt. a, <https://www.policingprinciples.org/chapter-7/7-05-proportional-use-of-force/>.

⁷⁸ Police Executive Research Forum, *Guiding Principles on Use of Force* 21 (Mar. 2016).

⁷⁹ *Id.*

⁸⁰ *Graham v. Connor*, 490 U.S. 386, 396 (1989) (quoting *Tennessee v. Garner*, 471 U.S. 1, 8–9 (1985)).

⁸¹ Anchorage Police Department, Operational Procedure 3.05.025, "Response to Resistance" at 1 (last rev. Aug. 14, 2024).

⁸² *Id.* at ¶ B.

⁸³ *Id.* at ¶ H (last rev. Aug. 14, 2024).

⁸⁴ Brandon L. Garrett & Seth W. Stoughton, "A Tactical Fourth Amendment," 103 *Virginia Law Review* 211 (2017).

- **Baltimore Police Department** – “Members shall use only the force Reasonable, Necessary, and Proportional to respond to the threat or resistance and to effectively and safely resolve an incident . . . Proportionality measures whether the force used by the member is rationally related to the level of resistance or aggression confronting the member.”⁸⁵
- **San Francisco Police Department** – “PROPORTIONALITY - When determining the appropriate level of force, officers shall, when feasible, balance the severity of the offense committed and the level of resistance, based on the totality of the circumstances known to or perceived by the officer at the time, with the level of force used and its likely injury outcome. It is particularly important that officers apply proportionality and critical decision making when encountering an armed subject.”⁸⁶
- **Los Angeles Police Department** – “Officers may only use a level of force that they reasonably believe is proportional to the seriousness of the suspected offense or the reasonably perceived level of actual or threatened resistance.”⁸⁷
- **Newark Police Division** – “Police Division members shall consider a subject’s level of resistance when using force . . . The level of control used shall be proportional to the threat or resistance the member encounters”⁸⁸

As it updates its force policies, APD should ensure that policy specifically defines and describes the concept of proportionality, articulate the requirement that all use of force must be proportional, and describe how all use of force must be consistent with the nature of the threat that a subject poses under the circumstances.

Recommendation 1.6. APD policy should provide sufficient detail on the factors that inform the “objective reasonableness” inquiry.

In *Graham v. Connor*, the United States Supreme Court articulated the basic, minimum standard under the Fourth Amendment of the Constitution that must be met in order for police officers to use force.⁸⁹ Specifically, all use of force must be “objectively reasonable” – or consistent with what a reasonable officer would do in light of all the circumstances that the officer who used force encountered.⁹⁰ The propriety of force depends not on the situation and circumstances as subjectively perceived or understood by the involved officer but, instead, on what a reasonable officer, under those same circumstances, would have perceived and understood.

⁸⁵ Baltimore Police Department, Policy 1115 at 1, 4 (Nov. 24, 2019), <https://www.baltimorepolice.org/1115-use-force>.

⁸⁶ San Francisco Police Department, General Order 5.01 at Section 5.01.02(D) (last rev. Jan. 12, 2022), <https://www.sf.gov/sites/default/files/2022-09/DGO%205.01%20Use%20of%20Force%20-%20Clean%20Version.pdf>.

⁸⁷ Los Angeles Police Department, “Policy on the Use of Force – Revised,” (June 29, 2020), https://www.lapdonline.org/home/news_view/66709.

⁸⁸ Newark Police Division, General Order No. 18-20, Section VII-A-1, <https://www.newarkpdmonitor.com/wp-content/uploads/2019/04/Use-of-Force-Policy.pdf> (Nov. 8, 2018).

⁸⁹ 490 U.S. 387 (1989).

⁹⁰ *Id.* at 397 (“[T]he ‘reasonableness’ inquiry . . . is an objective one: the question is whether the officer’s actions are ‘objectively reasonable’ in light of the facts and circumstances confronting them.”).

Although the general standard of “objective reasonableness” may function well for judges in the comfort of their courtrooms assessing a given application of force long after it has occurred, the standard can be vague and potentially challenging for officers to apply in the field during a call for service or encounter without more particular, real-world guidance. Consequently, other police agencies have found it useful to describe in greater detail within their force policies the types of parameters and factors which enter into the objective reasonableness determination. For example:

- **Las Vegas Metropolitan Police Department** – “Objective factors that affect the reasonableness of the force include:
 1. The severity of the crime.
 2. Whether the subject poses an immediate threat to the safety of officers or others.
 3. Whether the subject is actively resisting arrest or attempting to evade arrest by flight.
 4. The influence of drugs/alcohol or the mental capacity of the subject.
 5. The time available to an officer to make a decision.
 6. The availability of officers or resources (including the number of officers present at the time) to de-escalate the situation.
 7. The proximity or access of weapons to the subject.
 8. The environmental factors and/or other exigent circumstances.⁹¹
- **Metropolitan Nashville Police Department** – Factors used to determine “reasonableness” may include, but are not limited to:
 - a. The feasibility of using de-escalation tactics, crisis intervention or other alternatives to force;
 - b. The seriousness of the crime or suspected offense;
 - c. The level of threat or resistance presented by the subject;
 - d. Whether the subject was posing an immediate threat to officers or a danger to the community;
 - e. The potential for injury to citizens, officers or subjects;
 - f. The risk or apparent attempt by the subject to escape;
 - g. The conduct of the subject being confronted (as reasonably perceived by the officer at the time);
 - h. The amount of time and any changing circumstances during which the officer had to determine the type and amount of force that appeared to be reasonable;
 - i. The availability of other resources;
 - j. The training and experience of the officer;
 - k. The proximity or access of weapons to the subject;
 - l. Officer versus subject factors such as age, size, relative strength, skill level, injury/exhaustion and number of officers versus subjects; and

⁹¹ Las Vegas Metropolitan Police Department, Directive No. PO-035-20, Use of Force, <https://www.lvmpd.com/home/showpublisheddocument/7301/638912895444870000> (last rev. Aug. 2025).

- m. The environmental factors and/or other exigent circumstances.⁹²

Additionally, in interviews and focus groups, 21CP heard many APD officers describe various force incidents as involving force that, even though there were performance issues implicated, was ostensibly justified “in the moment” – suggesting an overly narrow aperture or time window when it comes to consideration of whether force was reasonable. However, as the Supreme Court recently clarified in *Barnes v. Felix*, all of the factors leading up to the application of force – including both subject actions and officer actions – are relevant to the totality of the circumstances inquiry.⁹³ It appears that APD policy, as well as training, discussed in greater detail below, needs to provide more specific guidance and guidelines to officers on the nature of the reasonableness inquiry.

Current APD policy goes a good distance toward providing some of this more specific, actionable guidance to officers:

- “Those factors include, but are not limited to, the seriousness of the crime or suspected offense, the level of threat or resistance presented by the subject, the risk or apparent attempt by the subject to escape, and whether the subject was posing an imminent threat to Officers or others.”⁹⁴
- “Before deciding to use physical force, an officer should consider the following:
 1. The immediacy of the threat
 2. The nature and severity of the crime or circumstances
 3. The nature and duration of actions taken by the subject
 4. Whether the subject is actively resisting custody
 5. Whether the subject is attempting to evade arrest by flight
 6. The number of subjects in comparison to the number of officers
 7. The size and condition of the subject in comparison to the officer
 8. The age, health, and condition of the subject
 9. The subject’s violent history, if known
 10. The presence of a hostile crowd or agitators
 11. Whether the subject is under the influence of drugs or alcohol to the extent it would affect their tolerance towards pain.”⁹⁵

However, it appears that revised policy drafts propose to delete this section. 21CP recommends including an updated version of the prior guidance. This recommendation does not assume or suggest that APD officers need to memorize or exhaustively analyze the various factors articulated in policy during every interaction in the field where force decision-making may be implicated, which would rarely be practical. Instead, this type of list of reasonableness factors can provide far greater specificity and more precisely identifies the types of real-world dynamics that may come into play in force decision-making – priming officers to focus as possible on the presence or absence of various factors as they apply a critical decision-making framework to encounters. A more specific list of reasonableness factors can also provide a clearer array of considerations for APD supervisors and command

⁹² Nashville Police Department, Title 11: Use of Force, Section 11.10.030, <https://www.nashville.gov/sites/default/files/2021-12/Department-Manual-Use-of-Force-Policy.pdf?ct=1640874735> (last accessed Jan. 8, 2026).

⁹³ *Barnes v. Felix*, 605 U.S. ____ at 5 (2025).

⁹⁴ Anchorage Police Department, Operational Procedure 3.05.025, “Response to Resistance” at 4 (last rev. Aug. 14, 2024).

⁹⁵ *Id.* at ¶ E.

staff to explore when determining whether a given application of force was consistent with policy – which can ensure greater fairness and uniformity in evaluating whether officers complied with APD force policy.

Separately, APD policy should more specifically detail the *objective* nature of the reasonableness inquiry. *Graham* makes clear that, in the reasonableness inquiry, the involved officer’s “underlying intent” or “subjective motivations . . . ha[ve] no bearing on whether a particular seizure is ‘unreasonable’ under the Fourth Amendment.”⁹⁶

Section I, “Use of Force Standards,” in APD’s current Response to Resistance policy appears as a somewhat orphaned, standalone section that partially describes the *Graham v. Connor* reasonableness inquiry – but it does not explain or emphasize the *objective* nature of the requirement (*i.e.*, what a reasonable officer under the circumstances would have done, that an officer’s subjective intentions or motivations are not a part of the analysis, etc.). Policy must ensure that the *objective* nature of the inquiry means that we ask what a reasonable officer on the scene would have done under the circumstances. This aligns closely with the “reasonable person” standard that the law frequently applies in other contexts – where the analysis focuses on what a hypothetical reasonable person, in the shoes of the individual actually involved, would have done under the same circumstances.⁹⁷

Recommendation 1.7. APD policy should consider more specifically, comprehensively, and uniformly defining types of subject resistance and/or eliminating the use of those terms within the context of use of force reporting.

APD’s current use of force reporting classifies subject resistance during encounters as “deadly assault,” “assaultive,” “active resistance,” “passive resistance,” and “suicidal.” However, APD’s policies on using force (3.05.025, “Response to Resistance”) and reporting force (3.05.020, “Reporting and Investigating Force”) effective as of November 24, 2025 do not define “active resistance,” “assaultive” resistance, or “deadly assault,” and the definitions of “active” and “passive” resistance are not as clear and precise as they could be.

Going forward, the Department should either (a) streamline and clearly define types of subject resistance and aggression, and describe the types of subject resistance or aggression not solely within defined terms but within the substance of the response to resistance/force policy itself,⁹⁸ or (b) collect more specific information about the specific nature of subject resistance (*i.e.*, the type of any physical resistance exhibited by the subject) rather than using the current, general categories (*e.g.*, “assaultive,” “active resistance,” etc.).

⁹⁶ 490 U.S. 387, 397.

⁹⁷ See, *e.g.*, Stephen G. Gilles, “On Determining Negligence: Hand Formula Balancing, the Reasonable Person Standard, and the Jury,” 54 *Vanderbilt Law Review* 813, 822-23 (2001) (“For as long as there has been a tort of negligence, American courts have defined negligence as conduct in which a reasonable man . . . would not have engaged.”).

⁹⁸ See, *e.g.*, North Miami Police Department, Standard Operating Procedure 300.16, “Response to Resistance” at 5–6 (last rev. Apr. 28, 2023), <https://www.northmiamifl.gov/DocumentCenter/View/17263/Response-to-Resistance-30016-PDF>; Albuquerque Police Department, SOP 2-55, “Use of Force Appendix” (last rev. June 2, 2017)), <https://www.cabq.gov/police/documents/2-53-use-of-force-definitions-draft-packet.pdf>; St. Paul Police Department, Policy 246.00, “Response to Resistance or Aggression” at Section 6, <https://www.stpaul.gov/sites/default/files/Media%20Root/Police/246.00%20RRA.%206-5-20%20revised.pdf> (last accessed Nov. 24, 2025).

APD expressed to 21CP the desire to avoid parsing out definitions of these terms in policy in favor of having officers describe, with specificity, the specific physical actions that a subject took. To ensure consistency across policy and reporting, the Department should then ensure that use of force reports (including all hard-copy or electronic forms and related data systems) do not compel the officers who are doing the reporting to determine the broader “category” of force (e.g., “assaultive,” “active resistance,” etc.) to which their application(s) of force belonged.⁹⁹

Recommendation 1.8. APD policy should require that officers exhaust all other means reasonably available to them under the circumstances before using deadly force.

A number of police departments include requirements that officers – consistent with the ideas that force must be necessary and consistent with a general duty to de-escalate when feasible under the circumstances – use all other reasonably available means under the specific circumstances before deploying deadly force.

- **Tampa Police Department** – “Before resorting to the use of deadly force, an officer shall . . . Exhaust all reasonable alternatives.”¹⁰⁰
- **Houston Police Department** – “Officers shall exhaust all reasonably available alternatives, such as, without limitation, issuing a verbal warning when possible prior to the use of deadly force.”¹⁰¹
- **Clearwater (Florida) Police Department** – “An officer . . . may use deadly force only as a last resort after all reasonably available lesser efforts have failed . . .”¹⁰²
- **Gilbert (Arizona) Police Department** – “Officers shall exhaust all other reasonable means of apprehension and control that would be reasonable and effective in the particular situation, before resorting to the use of firearms/deadly force.”¹⁰³
- **Newark, New Jersey Police Department** – “Police Division members . . . will make efforts to exhaust all reasonable means available before resorting to the use of force, as long as the member’s safety and that of other persons is not compromised.”¹⁰⁴

⁹⁹ If APD finds summarizing a subject’s level of threat or resistance in these broader terms for data *reporting* purposes, personnel could combined various specific *types* of force or physical actions into these broad categories for the Department.

¹⁰⁰ Tampa Police Department, Standard Operating Procedure 537, Section VI-B, <https://www.tampa.gov/document/sop-537-section-v-b8-33471>.

¹⁰¹ Houston Police Department, General Order No. 600-17 at 3 (last rev. Mar. 4, 2022), https://www.houstontx.gov/police/general_orders/600/600-17%20Use%20of%20Force.pdf.

¹⁰² Clearwater Police, About Us, Office of Professional Standards, Use of Force Complaint Policies, “6. Require Exhausting All Means Before Using Deadly Force,” <https://www.clearwaterpolice.org/About-Us/Office-of-Professional-Standards/Use-of-Force-Complaint-Policies#section-4>.

¹⁰³ Gilbert Police Department, Policy 201.20, “Firearms Use” at 1 (last rev. Jan. 1, 2026), <https://public.powerdms.com/GilbertAZ/tree/documents/1439015>.

¹⁰⁴ Newark Police Division, General Order No. 18-20 (Nov. 18, 2018), <https://www.newarkpdmonitor.com/wp-content/uploads/2019/04/Use-of-Force-Policy.pdf>.

APD emphasized to 21CP that, within the Department's current use of force investigations, factors regarding whether the involved officer had time to deliberate under the circumstances and the nature of the actions the involved officer took to mitigate the need to use force are required to be considered. Certainly, these are appropriate elements of a comprehensive use of force analysis – but they do not entirely substitute for policy requirements that officers deploy deadly force only when there are no reasonably available alternatives available to them under the circumstances.

Some police departments, as well as their lawyers, articulate concerns about whether “exhaust” imposes too high of a burden on officers and may import a legal framework that suggests an absolute duty to always deploy everything except deadly force – without exception and uninformed by the central use of force reasonableness inquiry (*i.e.*, accounting for what a reasonable officer would appreciate and do under the circumstances encountered by the involved officer on the scene). If a requirement simply to “exhaust” reasonably available force alternatives before using deadly force is language that is concerning to APD or the Municipality, alternative formulations may still be effective that focus on using deadly force only as a “last resort.” For example:

- **Milwaukee Police Department** – “Force that is intended or likely to cause great bodily harm or death may only be used as a last resort.”¹⁰⁵
- **Sacramento Police Department** – “It is the policy of the Department that a peace officer is justified in using deadly force upon another person only as a last resort when reasonable alternatives have been exhausted or are not feasible and the officer reasonably believes, based on the totality of the circumstances, that such force is necessary.”¹⁰⁶
- **Camden County Police Department** – “Officers should not exercise force unless it is necessary and as a last resort . . . Using force only as a last resort means that officers not engage in unnecessary, overly aggressive, or otherwise improper actions that create a situation where force becomes needed. Using force only as a last resort also means that an officer shall not use force if a safe alternative would achieve the law enforcement objective.”¹⁰⁷

Whatever language is selected, APD and its officers will benefit from clear policy instruction, supported by high-quality training, that provides that officers may use deadly force only when other, non-deadly force options are not reasonably available under the circumstances or have been tried and failed to resolve the threat of harm posed by the subject.

¹⁰⁵ Milwaukee Police Department, General Order 2025-63, “Use of Force” at Section 460.25(B) (last rev. Nov. 14, 2025), <https://city.milwaukee.gov/ImageLibrary/Groups/mpdAuthors/SOP/460-USEOFFORCE.pdf>.

¹⁰⁶ Sacramento Police Department, General Order 580.01, “Use of Force” at 1 (last rev. Dec. 16, 2021), <https://www.cityofsacramento.gov/content/dam/portal/police/Transparency/policy/GO/Section-500/GO-58002-Use-of-Force-122321.pdf>.

¹⁰⁷ Camden County Police Department, Use of Force Policy at 10, <https://static1.squarespace.com/static/58a33e881b631bc60d4f8b31/t/5d5c89c2e3bc4c000192f311/1566345667504/CCPD+UO+F+Policy+%288.21.19%29+%28FINAL%29.pdf> (last rev. Aug. 21, 2019).

Recommendation 1.9. APD policy should clarify confusion about the definition of “imminent threat” by emphasizing that a threat must be present and apparent based on the actions of the subject to justify deadly or significant force.

In 21CP’s conversations with officers, there appeared to be some confusion about the definition of “imminent threat” and when the nature of a threat might require and justify the use of significant or lethal force. Specifically, it appeared that some APD officers believe that a subject with a gun in their waistband alone constitutes an “imminent threat” that would justify the use of force.

Although Alaska state law does not specifically define “imminent threat,” many police department policies specifically emphasize that “[a]n imminent harm is not merely a fear of future harm”:

A threat to death or serious bodily injury is ‘imminent’ when, based on the totality of the circumstances, a reasonable officer in the same situation would believe that a person has the present ability, opportunity, and apparent intent to immediately cause death or serious bodily injury to the peace officer or another person. An imminent harm . . . is one that, from appearances, must be instantly confronted and addressed.¹⁰⁸

Current APD policy defines “Imminent Threat” as “[a] threat that, based on a reasonable officer’s perception of the suspect’s apparent means, intent, and ability is likely to cause harm to the officer or others, and must be confronted or addressed.”¹⁰⁹ This formulation is largely correct and consistent with the policies of other departments.

However, it appears that at least some APD officers are confusing the appreciation that the subject *may* have the means, intent, and ability in the abstract or in the future, rather than in the present, to justify a use of force. The presence of a gun in a subject’s waistband, for instance, transforms a situation into one of elevated risk but it does not, by itself, establish an “imminent” threat. Similarly, a subject driver in a vehicle who does not comply with officer commands to exit a vehicle may signal a situation where there is an elevated potential for harm to officers or bystanders, but the sole fact that the noncompliant driver may still be able to operate a vehicle in ways that could potentially injure those officers or bystanders does not mean that the driver constitutes an imminent threat that justifies the use of deadly force.

“Imminence” in the law, as in common usage, connotes something that is impending or about to occur – not something that is possible or conjectural. Through refined policy and the provision of opportunities to APD officers to practice application of a critical decision-making framework in realistic use of force training officers, the Department must emphasize that an “imminent threat” must be present and apparent under the circumstances to justify the use of deadly force.

Recommendation 1.10. APD policy should specifically prohibit: (a) the use of force against subject(s) who only verbally confront officers and/or are solely engaged in the exercise of First Amendment rights, and (b) retaliatory force. APD policy should clarify

¹⁰⁸ Los Angeles Police Department, “Policy on the Use of Force—Revised” (June 29, 2020), <https://www.lapdonline.org/newsroom/policy-on-the-use-of-force-revised/>; accord California Penal Code § 835(a)(2).

¹⁰⁹ Anchorage Police Department, Operational Procedure 3.05.025, “Response to Resistance” at 3 (last rev. Aug. 14, 2024).

details relating to existing prohibitions on (c) the application of chokeholds, neck holds, and any other tactics that place pressure on the individual’s airway in any manner and/or run a reasonable risk of restricting the flow of blood and oxygen to a subject’s brain; and (d) the use of force against subjects who are handcuffed or otherwise restrained.

Many police department policies on use of force include specific prohibitions on force that – because it is almost always unnecessary, disproportionate, and objectively unreasonable – are rarely consistent with policy or law. To this end, APD’s current Response to Resistance policy commendably includes a number of appropriate prohibitions on the application of certain force types and/or force in particular circumstances. For example, as this section discusses in greater detail below, existing APD policy appropriately prohibits the use of chokeholds and neck restraints¹¹⁰ and against individuals already in handcuffs except if certain narrow exceptions apply.¹¹¹

21CP recommends that APD build on its existing policy by (1) specifically prohibiting additional types of force, and (2) clarifying some of the specifics around existing prohibitions. First, because individuals who are *solely* engaged in the exercise of their First Amendment rights do not, even if noncompliant with officer commands, pose an imminent threat of physical harm to officers or others, use of force against such individual is unlikely to be necessary, proportional, and reasonable. APD should therefore prohibit the use of force against individuals only engaged in the exercise of First Amendment rights, with individuals who are only verbally confronting officers.

Second, APD’s force policy should expressly prohibit retaliatory force, i.e. force that – because it is deployed to “pay a subject back” rather than because the subject is posing a threat – is not necessary, proportional, or objectively reasonable under the circumstances.

21CP notes that an additional, important prohibition in force policies relates to techniques and/or modes of transport that run a substantial risk of positional asphyxia. Although currently effective policy does not address the issue, language in proposed draft policies that 21CP reviewed would appropriately address the current gap.¹¹²

With respect to strengthening and clarifying existing prohibitions, APD can further enhance its prohibition on the use of chokeholds and neck restraints by including a specific, clear definition of “choke hold” and “neck restraint.” Further, given some historical variability in nomenclature and training, best practice points to agencies expressly prohibit chokeholds, vascular neck restraints, *and* any other type of maneuver that runs a reasonable risk of restricting the flow of oxygen to an individual’s head. Ultimately, APD should ensure that any application of force that involved more than incidental contact with a subject’s neck be documented and investigated appropriately. For instance:

- **Baltimore Police Department** – “A Chokehold or Neck [H]old is any hold or contact that (a) runs a reasonable risk of inhibiting breathing by compression of the airway in the neck, (b) runs a

¹¹⁰ *Id.*

¹¹¹ *Id.* at ¶ H(2)(e).

¹¹² Anchorage Police Department, Proposed Revisions, Policy 3.01, “Use of Force” at § IV(F) (“Restrained persons shall be positioned so that breathing is not obstructed. Restrained persons should be maintained in a seated position or placed on their side. Restrained persons should not be placed in a prone or other position that increases the risk of positional asphyxia.”).

reasonable risk of inhibiting blood flow by compression of the blood vessels in the neck, and/or (c) exerts more than momentary, incidental pressure to the back or side of the neck. Chokeholds/Neck Holds are prohibited unless the use of Deadly Force/Lethal Force is justified.”¹¹³

Additionally, current APD policy does appropriately provide that “[f]orce shall not be used against persons in handcuffs, except as objectively reasonable to prevent imminent bodily harm to the Officer or another person or persons, to prevent escape, or as objectively reasonable, where physical removal is necessary to overcome passive resistance.”¹¹⁴ This language regarding the application of force to handcuffed individuals engaged in passive resistance should be clarified to ensure that the application of force in such circumstances should be deployed only when (a) all other available compliance techniques have been tried and/or failed, and (b) verbal warnings have been provided.

It should be noted that some express concerns that general prohibitions in force policies could prevent officers from defending themselves against significant threats. The potential for situations to devolve into a “fight for your life” situation, in which officers may need to defend themselves from a grave threat using whatever means is at their disposal, is a common and not unwarranted concern. Nothing about APD’s current or recommended general prohibitions described above should prevent an officer, confronted with a lethal threat, from using whatever means are at the officer’s disposal to ensure the safety of themselves or others.

To acknowledge that there may be exceptional circumstances in which an officer has no other choice to defend themselves but to use whatever tool is at their immediate disposal, a number of policies contemplate that an officer might, in extraordinary circumstances, need to resort to typically unauthorized force:

- **Cleveland Division of Police** – “In rare and exceptional situations where, under the facts and circumstances confronting the officer, a reasonable officer would believe that (a) the use of deadly force would be objectively reasonable, necessary, and proportional according to this policy, and (b) the subject’s actions constitute an immediate danger and grave threat to the officer or others, and (c) no other force options, techniques, tactics, or choices consistent with the Division’s policy are available, it may be necessary for an officer to take extraordinary or unanticipated actions in order to overcome the threat. In these rare and exceptional situations, officers must specifically articulate and justify with particularity the specific tactic(s) or action(s) employed and the reasons why their actions met each of the criteria (a), (b), and (c) set forth above. The officer’s actions, including all actions preceding the use of deadly force, shall be subject to strict review.”¹¹⁵

APD could consider adopting this type of policy language to clarify and acknowledge that officers might, in very limited instances, have to apply typically-prohibited force to counter a deadly threat because it is the option that

¹¹³ Baltimore Police Department, Policy 1115, Use of Force (rev. Mar. 11, 2024), <https://www.baltimorepolice.org/transparency/bpd-policies/1115-use-force>

¹¹⁴ Anchorage Police Department, Operational Procedure 3.05.025, “Response to Resistance” at ¶ H(2)(e) (last rev. Aug. 14, 2024).

¹¹⁵ Cleveland Division of Police, Use of Force: General (last rev. Mar. 20, 2023), <https://www.clevelandohio.gov/sites/clevelandohio/files/policies-procedures/2.01.03%20Use%20of%20Force%20-%20General.pdf>.

is available under the circumstances. If adopting language of this type, APD would need to ensure that articulated exceptions do not undo or undermine the purpose of a generalized prohibition on some force.

Recommendation 1.11. APD policy should memorialize the Department’s current general practice and require that officers carry less-lethal instruments.

A number of this report’s recommendations focus on ensuring that APD policy, training, and review processes emphasize the need for officers to apply a critical decision-making model to calibrate, under the circumstances, the most appropriate force response. Contemporary policing continues to benefit from a number of tools and instruments – such as OC spray, Tasers, less-lethal munitions, and other technologies – that are force that is less significant than lethal force that officers can deploy to resolve situations with less risk than going “hands on” with a subject.

As noted in Part I of this report, available APD data does not definitively establish how often APD officers deploy less-lethal instruments – or how often the deployment of such instruments is effective in resolving the situation. Nevertheless, 21CP understands from its interviews and focus groups with Department personnel that many APD officers are indeed equipped with OC spray and/or Tasers.¹¹⁶

However, the Department’s force policy should more clearly memorialize what force instruments officers *must* carry and what instruments officers *are authorized* to carry should they elect to do so and meet training and certification requirements. Many departments specifically require that officers carry at least one, if not multiple types, of less-lethal weapons:

- **Ann Arbor Police Department** – “Uniformed officers are required to carry a minimum of two of these [less-lethal] weapons systems on their person when on duty outside City Hall with the Taser being one of the required options.”¹¹⁷
- **Cumberland (Maryland) Police Department** – “Officers assigned to patrol functions will be required to carry their issue handgun, ASP baton, oleoresin capicum (*pepper spray*), and a conducted electrical weapon (*Taser*).”¹¹⁸

Even if this policy change simply memorializes the common practice, APD would benefit from articulating that carrying less-lethal instruments is a generally-applicable, mandatory requirement for sworn personnel.

Recommendation 1.12. APD’s use of force policy should impose an affirmative duty on officers to intervene when other officers are using force that runs a reasonable risk of violating law or APD policy.

¹¹⁶ Focus Group with APD Stakeholders (Aug. 26, 2025).

¹¹⁷ Ann Arbor Police Department, Policy and Procedural Order 001-004 at 3 (last rev. Apr. 14, 2025), <https://public.powerdms.com/a2gov/documents/2198>.

¹¹⁸ Cumberland Police Department, General Order 4.0, “Use of Force” at 6 (last rev. Jan. 1, 2024), <https://www.cumberlandmd.gov/DocumentCenter/View/4785/4-USE-OF-FORCE-Includes-Taser-and-Pepperball>.

In APD's current Response to Resistance policy, an officer's duty to intervene when other officers are using inappropriate force is not addressed. 21CP recommends that APD policy require intervention whenever an officer observes conduct that runs a reasonable risk of violating policy or law. This means that intervention should occur regardless of whether an officer definitively knows whether the identified performance or behavior would constitute a violation of law or policy.

- **Chattanooga Police Department** – “Each department member has the individual responsibility to intervene and stop any other member from committing an unlawful or improper act, including but not limited to, acts of brutality, abuses of process, abuses of authority, and any other criminal acts or major violations of department rules and procedures.”¹¹⁹
- **Elizabeth (New Jersey) Police Department** – “All officers who observe another officer about to use force that is illegal, excessive, or otherwise inconsistent with this general order must, if feasible, do whatever they can to interrupt the flow of events before the fellow officer engages in an improper use of force.”¹²⁰
- **United States Department of Justice** – “Officers will be trained in, and must recognize and act upon, the affirmative duty to intervene to prevent or stop, as appropriate, any officer from engaging in excessive force or any other use of force that violates the Constitution, other federal laws, or Department policies on the reasonable use of force.”¹²¹

Consistent with Recommendation 4, APD should consider implementing Active Bystandership for Law Enforcement (“ABLE”) training – a national training program provided in hundreds of agencies across the country on practical intervention skills – in order to foster a culture of, and provide specific techniques for officers relating to, peer intervention.¹²²

Recommendation 1.13. APD should update policies and training regarding less-lethal weapons.

Generally, APD's policies on less-lethal instruments reflect many elements of best practice, model, and peer agency guidance. For instance, APD policy appropriately prohibits the use of the Taser across a number of instances, including where the subject is elderly, pregnant, in an elevated position, already handcuffed, operating a vehicle in motion, in close proximity to flammable materials, etc.

Recommendation 1.13.a. Policy should caution officers against the use of OC spray in windy conditions, because it might affect individuals other than the intended target, and in

¹¹⁹ Chattanooga Police Department, Policy Manual, ADM-16, “Code of Conduct” at Section 26.1.1(C) (last rev. June 8, 2020), <https://chattanooga.gov/sites/default/files/2024-09/ADM-16-Code-of-Conduct.pdf>.

¹²⁰ Elizabeth Police Department, General Orders, Use of Force (Vol. 3, Ch. 2) at VI(A)(1) (last rev. July 30, 2025), <https://public.powerdms.com/ELIZABETH/documents/691784>.

¹²¹ United States Department of Justice, *Justice Manual*, Title 1, Section 1-16.400 (last rev. July 2022), <https://www.justice.gov/jm/1-16000-department-justice-policy-use-force#1-16.400>.

¹²² Georgetown Law, Center for Innovations in Community Safety, Active Bystandership for Law Enforcement (ABLE) Project, <https://www.law.georgetown.edu/cics/able/> (last accessed Nov. 25, 2025).

circumstances where the flammability of OC spray might pose a risk (such as in conjunction with Tasers).

By its nature, the application of OC spray can be materially impacted by the nature of the environment where it is deployed. Wind can lead to inadvertent application on unintended individuals (whether the applying officer, nearby civilians, or officers).¹²³ Additionally, “because it is flammable, [OC spray] can’t be used in combination with Tasers or other ECWs,” around a flame, or in other circumstances where flammability might pose a risk.¹²⁴ Accordingly, APD policy should provide caution to officers regarding application within such circumstances.

Recommendation 1.13.b. Policy should specifically prohibit the application of OC spray on individuals who are handcuffed or restrained unless they pose an immediate threat to officer or public safety.

To promote the application of proportional force, and avoid the application of unnecessary force, a number of police agencies generally prohibit the application of OC spray on individuals who are already handcuffed or restrained unless certain, specific exceptions are met. For example:

- **Baltimore Police Department** – “Members shall not use OC spray on a person who is handcuffed or otherwise restrained, except in the rare and exceptional circumstances where: The person is displaying combative and/or violent behavior, [t]he person presents an Imminent Threat to the safety of the member and/or other persons, and [l]esser means or attempts to resolve the incident such as hands-on arrest or control techniques have failed.”¹²⁵

As APD considers updating its policies, it should provide similar, specific guidance to officers regarding the application of OC spray when individuals are handcuffed or restrained.

Recommendation 1.13.c. APD should ensure that APD personnel receive regular, ongoing training on less-lethal instruments focusing not merely on technical re-qualification but on use of force decision-making in realistic scenarios that may implicate deployment of less-lethal weapons.

APD personnel suggested to 21CP that “training on less-lethal . . . needs to be more or as consistent as firearms training. We need more repetition and more reality-based training” involving less-lethal instruments.¹²⁶ 21CP also

¹²³ U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, “Oleoresin Capsicum: Pepper Spray as a Force Alternative,” *Technology Assessment Program* (Mar. 1994), <https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/pepper.pdf>; Leadership Conference on Civil and Human Rights, *New Era of Public Safety* 139 (2019), https://civilrights.org/wp-content/uploads/Policing_Full_Report.pdf.

¹²⁴ Leadership Conference on Civil and Human Rights, *New Era of Public Safety* 139 (2019), https://civilrights.org/wp-content/uploads/Policing_Full_Report.pdf.

¹²⁵ Baltimore Police Department, Policy 1118, “Oleoresin Capsicum (OC) Spray” at 5 (Oct. 9, 2023), <https://public.powerdms.com/BALTIMOREMD/documents/320114>.

¹²⁶ Focus Group with APD Stakeholders (Aug. 26, 2025).

heard from APD personnel that sometimes, personnel tend to avoid using PepperBall and 40mm less lethal rounds “because of fear of discipline” if they deploy the instruments incorrectly.¹²⁷

As noted in Part I of this report, available APD data does not allow for definitive conclusions about how frequently APD officers use less-lethal instruments. On the one hand, reported data by APD suggests that 4.8% of force incidents involved less-lethal weapons, but data on the specific types of less-lethal tools that are used (*e.g.*, Taser, OC spray, etc.) suggests they are used even less frequently. Some APD personnel posited some explanations to 21CP:

When you use less lethal, FRB is triggered automatically, so officers immediately think the big machine is coming down to discipline them – which is not the case. Ninety-nine percent of the time, FRB looks at it and goes, ‘Great,’ or, ‘This is what we can do better.’ But that’s why they’re hesitant to use less-lethal.¹²⁸

At the same time, APD officers, when asked by 21CP what might be helpful in getting officers to deploy less-lethal instruments more readily where appropriate under the circumstances, said that “increased training and familiarity with the weapons, which would then increase confidence in using less-lethal” would be critical.¹²⁹ This may be especially true in connection with the Taser. Historically, the Taser was less effective for APD because the Taser’s probes can encounter difficulties penetrating heavy clothing, which is necessary for the Taser to work. APD personnel indicated that they are hopeful that the Taser 10 will help with these issues and make them a more practical, effective tool for APD officers. It is likely, however, that officers will benefit from additional instruction and scenario-based training in order to become fully knowledgeable and comfortable about the ways that the Taser 10 model differs from prior generations of the technology.

As APD works to update policies and enhance use of force training, it should take care to ensure that scenario-based training that emphasizes use of force decision-making involves dynamics surrounding the application of less-lethal instruments.

Recommendation 1.14. APD should work to finalize current working Policy 3.08 regarding the deployment of canines.

Some APD community members expressed concerns to 21CP in interviews about APD’s use of canines, citing instances in which they indicated that canines were inappropriately deployed or caused injuries to individuals that were not justified.

APD currently has a lengthy canine manual that provides a substantial amount of important guidance on canine deployment and handling. However, it does not appear that APD currently has a general policy on canine deployment effective as of Fall 2025. 21CP did review a draft policy that addresses a number of critical provisions, and APD should work to make this effective by continuing to streamline the draft, harmonizing it as appropriate with the existing canine manual, and providing training and guidance to all officer personnel, as well as canine handlers, on the policy.

¹²⁷ *Id.*

¹²⁸ Focus Group with APD Stakeholders (Sept. 3, 2026).

¹²⁹ Focus Group with APD Stakeholders (Aug. 26, 2025).

21CP does note that some provisions of the canine policy may need to be evaluated further before finalization to ensure alignment with other Department policies and approaches. For example, the current draft could appear to allow the use of canines at public demonstrations and protests – an environment in which many departments do *not* use canines. However, APD’s crowd control policy prohibits canines from being used in crowd control contexts. As APD works to finalize policy 3.08, it should ensure alignment with these and other existing provisions relating to canines.

2. Training

Recommendation 2. APD should update and enhance its overall training capacity to develop and provide dynamic, integrated, skills-focused, and scenario-based training grounded in adult learning principles and techniques.

Traditional police officer training – including that relating to use of force – too often “focuses on range shooting, classroom-based learning, and minimal exposure to realistic scenarios.”¹³⁰ Frequently, officers are required to passively consume large streams of information about rules, laws, and regulations rather than having an opportunity to develop skills, practice implementing knowledge or approaches, and confronting real-world problems in realistic settings.

21CP’s review of APD training materials found that a good portion is static, PowerPoint-oriented classroom training that emphasizes policy and legal obligations but does not provide dynamic opportunities for personnel to develop skills or apply knowledge to realistic scenarios and settings. This seemed to match some of the observations of APD personnel regarding officer training. Historically, per one APD stakeholder, “we used to go years without training, and now we have constant training.”¹³¹ Another explained:

In the last two to three years, we’ve been able to focus on hard skills and tactics in [] in-service training . . . Before that, we had in-service blocks throughout the year, [but] . . . there might have been little use of force or tactics training – more focus on . . . things you don’t need to be in-person to train for. It was one long day per year . . . bouncing from topic to topic. [They] would teach something once and never go back to it again.¹³²

One supervisor characterized training as formulaic and rigid as it was when they experienced it, suggesting that officers had previously needed to learn realistic performance expectations not from training but through experience in the field:

In the Academy, we teach very robotic – “if X, then Y.” We were taught that, too, but we don’t look at it that way. We would break what we were taught . . .¹³³

¹³⁰ Judith P. Andersen, et al, “Highly Realistic Scenario Based Training Simulates the Psychophysiology of Real World Use of Force Encounters: Implications for Improve Police Officer Performance,” 5 *Journal of Law Enforcement* 1, 1 (2016), https://tspace.library.utoronto.ca/bitstream/1807/73822/3/highly_realistic_scenario_based.pdf.

¹³¹ Interview with APD Stakeholder (Aug. 25, 2025).

¹³² Focus Group with APD Stakeholders (Aug. 26, 2025).

¹³³ Interview with APD Stakeholder (Aug. 25, 2025).

In an entirely different interview, another APD officer used nearly identical language, describing “some of them [recent use of force incidents] are officers being almost robotic – if X, then Y.” The solution to this dynamic, explained another APD member, is more training emphasizing use of force decision-making skills:

I think training is key . . . We are trying to add more thought process into the training. We’re trying to add more grey – how do you not get yourself into this situation?¹³⁴

To this end, President Obama’s Task Force on 21st Century Policing emphasized the “need for realistic, scenario-based training to better manage interactions and minimize force”¹³⁵ As the Leadership Conference for Civil Rights has recommended, “[o]fficers should practice, in interactive environments . . . de-escalation techniques and threat assessment strategies that account for implicit bias in decision-making.”¹³⁶ In the same way that ongoing training puts pilots in flight simulators to practice the response to real-world flight scenarios,¹³⁷ effective law enforcement training presents real-world scenarios and asks officers to practice responding and implementing practical decision-making skills.

Recently, APD has been investing resources and focus on “Reality-Based Training” scenarios. APD members described that recent use of force training has been “able to take those incidents” that have occurred within APD recently “and turn them into lessons learned for the entire department, not just the officer involved” by using the actual circumstances and events as the basis for training scenarios.¹³⁸ 21CP understands that, although initial scenario training was geared toward “re-creat[ing] the scenarios exactly as they happened,” more recent scenarios have used real-world situations as a starting point, with training “provid[ing] different iteration of th[e] scenario.”¹³⁹

Supervisors and rank-and-file officers alike had generally positive things to say about such training, with the focus on scenarios and team tactics in particular seen as positive developments¹⁴⁰:

Training has been improved overall. There is still room to grow and update methodologies, but, overall, the movement toward team tactics and decision-making has improved.¹⁴¹

Indeed, 21CP’s reviews found that this recent training covers important topics in an engaging, realistic way that allows officers to practice and develop decision-making skills. It appears, then, that APD’s recent efforts in this area provide a strong foundation going forward and suggest a future pathway that emphasizes realistic, practical, skills-oriented instruction for both in-service training to current officers and introductory training for new

¹³⁴ *Id.*

¹³⁵ Final Report of the President’s Task Force on 21st Century Policing 52 (2015).

¹³⁶ The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 143 (2019).

¹³⁷ See, e.g., Marcel Bernard, “Real Learning Through Flight Simulation: The ABCs of ATDs,” FAA Safety Briefing (Sept./Oct. 2012), https://www.faa.gov/news/safety_briefing/2012/media/SepOct2012ATD.pdf.

¹³⁸ Interview with APD Stakeholder (Aug. 25, 2025).

¹³⁹ Focus Group with APD Stakeholders (Aug. 26, 2025).

¹⁴⁰ *Id.*

¹⁴¹ *Id.*

Academy recruits. APD personnel generally agree that an expansion of the recent shift in training approach would be welcome, saying that officers in particular would benefit from more training on:

[The] training of tactics – slowing down and using all the tools available to use, to include less-lethal, talking to people. Do we really need to be there? Is this a police problem? Is there a better way to tackle this problem than going in and throwing nine officers at a person and creating a higher likelihood of using force?¹⁴²

APD should build on its reality-based training foundation and embrace broader, systemic changes across all training – bringing interactive, dynamic elements across a range of training, including the substantial amount of training that, by necessity, cannot involve the immersive role-playing scenarios, simulators, or virtual reality training platforms. Many instructional strategies grounded in adult learning techniques are effective in police instruction generally and use of force training specifically – and do not require the specific dedication of resources that the use of more complex approaches like role-playing scenarios or technologically-assisted simulations require. These include verbal scenarios, group discussions analyzing officer performance from an incident captured on video, role playing, demonstration, group analysis of scenario performance, and many others.¹⁴³ As APD contemplates future training on use of force, as well as many other topics, it should look to enhance its general approach to training to emphasize this form of realistic, skills-oriented, and dynamic adult learning.

Recommendation 3. Whenever APD makes substantive changes to its use of force policies, it should provide initial and ongoing training to all sworn personnel to ensure that officers understand the new performance expectations.

As APD contemplates making changes to its force policies, and 21CP recommends additional updates and enhancements, the Department should prepare to ensure that all sworn personnel have a meaningful opportunity to understand and practice implementing new policy expectations before the policies are made fully effective in the field. Within large police organizations, the simple provision of new paper policies is typically insufficient to ensure a shared understanding across personnel and all areas and roles of the Department, about what performance is required going forward.

Instead, as part of its internal change management process, when a critical policy (*e.g.*, response to resistance/use of force) is revised, the Department should first provide separate training for training *instructors* to ensure that they have a clear understanding of the changes that they will present to the rank-and-file. Then, prior to a revised or updated policy that makes material changes becoming effective in the field, APD officers should have the opportunity to both learn about the details of policy changes and to practice implementing and adhering to those changes in the controlled learning environment of a training course.

For this type of training to be effective, all sworn personnel – including supervisors and command staff – should attend and complete the training. Indeed, it can be especially challenging when patrol officers and/or lower-level supervisors are more up-to-date on current policies and approaches than mid- or upper-level supervisors. To this

¹⁴² Interview with APD Stakeholder (Sept. 3, 2025).

¹⁴³ See, *e.g.*, Centers for Disease Control and Prevention, *How to Captivate and Motivate Adult Learners* (Nov. 2018), <https://www.cdc.gov/training-development/media/pdfs/adult-learning-guide-508.pdf>.

end, it appears that at least some prior APD training related to force has not been uniformly attended and completed by all ranks of APD personnel.

For instance, the Police Executive Research Forum’s Integrating Communications, Assessment, and Tactics (“ICAT”) training – developed by the national organization “with input from hundreds of law enforcement professionals nationwide” and focusing on “provid[ing] first responding police officers with the tools, skills, and options they need to defuse a range of critical incidents successfully and safely” – was provided to APD rank-and-file officers and patrol sergeants and appears to have been well-received.¹⁴⁴ However, it does not appear that all supervisors or command staff attended. In addition to future trainings being attended by all sworn personnel, APD should ensure that all supervisors who have not completed the ICAT training specifically receive that training going forward. Further, when asked if ICAT training resulted in changes in policy or training within APD, 21CP heard from one member of APD that “the general feel when we get done with outside trainings is a positive re-affirmation that we are doing things right already...[and that] the principles in ICAT training are what we are already teaching.”¹⁴⁵

Recommendation 4. APD should provide regular, ongoing training to all sworn personnel on use of force. This training should focus on critical decision-making skills, de-escalation strategies, high-risk traffic stops, tactics and techniques to address circumstances where there is elevated concern of flight or the subject eluding law enforcement, peer intervention, and team tactics.

Consistent with, and building on, Recommendations 2 and 3, APD should commit to providing regular, ongoing training to all sworn personnel on use of force that is dynamic, focused on cultivating and practicing decision-making skills, and oriented toward the development and practice of de-escalation. Based on this report’s other findings and recommendations, early training for officers should focus on high-risk traffic stop techniques, situations in which there is an elevated concern of flight or the subject eluding law enforcement, instances where teams of officers need to quickly coordinate a tactical approach for bringing a subject into custody, and strategies for peer intervention when colleagues are engaged in tactics or performance that runs a reasonable risk of violating APD policy or the law.

21CP heard from APD that APD is in the process of acquiring an effective virtual reality training tool that promises to allow officers and supervisors to work as a team during tactical scenarios – which promises to provide opportunities to practice team tactics and enhance teamwork and communications in significant situations. As 21CP’s Part I findings detailed, it appears that Department personnel can benefit from training opportunities to practice formulating tactical approaches with other on-scene personnel during rapidly developing encounters.

This virtual reality technological platform, combined with a myriad of other adult learning techniques and skills-oriented approaches discussed previously, can help to ensure that the ongoing use of force training that officers need is something that, rather than endlessly re-hashing static PowerPoint presentations on use of force policies,

¹⁴⁴ Police Executive Research Forum, “ICAT Training Guide,” <https://www.policeforum.org/icat-training-guide> (last visited Jan. 30, 2026).

¹⁴⁵ Interview with APD Stakeholder (Aug. 25, 2025).

allows officers to practice applying knowledge and skills in realistic settings—transforming training into a pathway for skill refinement and professional development.

Recommendation 5. APD should develop and provide all APD officers with initial and ongoing training focusing on cross-cultural communication, cultural competency, interactions with individuals with limited English proficiency, and procedural justice.

APD should develop and provide training for personnel on a set of closely related concepts and skills. Cross-cultural competency training typically focuses on building a greater awareness of a training subject’s own cultural values, enhanced knowledge and understanding of different worldviews, and learning about culturally appropriate intervention strategies.¹⁴⁶ It relates closely to training on what is sometimes called “linguistic competency,” or “[t]he capacity of an organization and its personnel to communicate effectively, and convey information in a manner that is easily understood by diverse audiences including persons of limited English proficiency, those who have low literacy skills or are not literate, individuals with disabilities, and those who are deaf or hard of hearing.”¹⁴⁷ The ability to apply communication skills dynamically when interacting with individuals of different cultural backgrounds or with different cultural assumptions is at the core of what is typically referred to as “cross-cultural communication.”

Meanwhile, procedural justice refers to a commitment, across interactions, to: (1) being fair in processes; (2) being transparent in actions (often by explaining the nature and rationale for officers taking particular actions during encounters); (3) providing opportunity for subjects to voice their concerns or experience; and (4) being impartial in decision-making.¹⁴⁸ Acting with procedural justice reflects that:

People want an opportunity not only to understand what is happening but also to feel they have an opportunity . . . to ensure their side of the story is heard. No one likes to feel their future is being decided upon at another person’s whim; rather, people want voice or representation in decisions that may directly affect them. We all want decision making to be guided by impartiality, ensuring that biases did not influence the decision and ultimately the outcome.¹⁴⁹

Procedural justice “reflects the fact that people assess police legitimacy based on *how they are treated* rather than on the outcomes of the interactions.”¹⁵⁰ A commitment to procedural justice focuses on fairness, transparency, the opportunity for individuals to have voice in an encounter or exchange, and impartiality as the primary attributes that individuals need to have present to believe that they were treated justly.

¹⁴⁶ See, e.g., D. Sue, et al, *Multicultural Counseling Competencies* 35–46 (1998).

¹⁴⁷ National Center for Cultural Competence, Georgetown University, “Mission and Linguistic Competence” (last rev. Mar. 2009), <https://nccc.georgetown.edu/documents/Definition%20of%20Linguistic%20Competence.pdf>.

¹⁴⁸ The Justice Collaboratory, Yale Law School, *Procedural Justice*, <https://law.yale.edu/justice-collaboratory/procedural-justice> (last visited Oct. 3, 2023).

¹⁴⁹ U.S. Department of Justice, Office of Community Oriented Policing Services, (Apr. 2015), *Organizational Change through Decision Making and Policy: Procedural Justice Course for Managers and Supervisors*, https://cops.usdoj.gov/html/dispatch/04-2015/a_new_procedural_justice_course.asp.

¹⁵⁰ The Leadership Conference on Civil and Human Rights, *New Era for Public Safety: A Guide to Fair Safe and Effective Community Policing* 17 (2019) (emphasis in original).

Numerous stakeholders – including APD personnel, government stakeholders, and Anchorage community members – relayed to 21CP that Anchorage has a diverse population who come from a variety of heritages and backgrounds. For instance, given that the fastest-growing, non-white community in Anchorage, and Alaska overall, is the Pacific Islander Community, generalized orientation to community-specific concerns could aid APD personnel in providing effective services and interacting with that population.

Likewise, given the historical dynamics impacting the Alaska Native population, Municipality and community stakeholders suggested to 21CP that APD officers would benefit from in-depth, structured training addressing generational trauma, cultural history, issues relating to the impact of drug and alcohol use in Native communities, and other community-specific dynamics.¹⁵¹ For example, 21CP heard from one community member, “There is a very big mistrust of the police department within my [Pacific Islander] community itself, and from myself, . . . I don’t even know if there are protocols or procedures or training to understand people and to know who they are working with.”¹⁵²

Based on 21CP’s review of new officer/recruit training, it appears that four (4) hours of cultural competency training are offered. For ongoing, in-service training for existing officers, it does not appear that this has been an area of focus in recent years. As one Anchorage stakeholder observed, “the lack of training that . . . recruits are getting – cultural sensitivity is paramount in a community as diverse as ours, and it’s been lacking.”¹⁵³ Several communities members agreed that the Department is “in serious need of cultural competency” training.¹⁵⁴

APD should work to expand such training going forward. Additionally, 21CP understands that the Department has one Academy class related to cultural competency, and that it is adding a class focused on the Alaska Native population, which will be administered by the Alaska Department of Public Safety.

To guard against concerns that the training would be viewed as “checking a box” or in service of a particular political agenda, APD should work to incorporate this training into a wider training module on field dynamics and critical decision-making skills, focusing on the ways that individuals of differing backgrounds may have different responses to police presence, interactions, and/or commands.

¹⁵¹ See, e.g., Interview with Anchorage Stakeholder (Oct. 8, 2025).

¹⁵² Interview with Community Stakeholder (September 2, 2025).

¹⁵³ Interview with Anchorage Stakeholder (Oct. 6, 2025).

¹⁵⁴ Focus Group with Community Stakeholders (Sept. 30, 2025).

B. Reporting, Investigation, Review & Adjudication of Force

1. Use of Force Reporting & Post-Incident Response

Recommendation 6. APD should work to ensure that it collects more comprehensive aggregate data across all use of force incidents.

Section II-A-1 of this report inventoried a number of limitations within APD’s use of force data that prevent a more detailed, comprehensive analysis of the factors and circumstances that tend to lead to, or be associated with, APD officers using force. This included the absence of aggregate information on officer-involving shootings, limited information on both involved subject and officer characteristics, limited information about overall incident characteristics.

The Department should update and enhance its use of force reporting forms (whether electronic or hard-copy) to require involved and witness officers to provide substantially more, and more detailed, information in categorical or fielded data formats – allowing for information to be easily aggregated and analyzed. Although the detailed accounts of officers in use-of-force narratives are important, the free-response nature of this narrative reporting does not allow for the detailed quantitative analysis of use of force characteristics for trends. Going forward, the Department should look to optimize ways for officers to provide information about encounters in a way that can be more easily analyzed and aggregated.

Additionally, despite the fact that the Level of force is determined for each force incident and guides the nature of the Department’s follow-up, investigation, and review, the Department was not able to produce aggregate data – that is, data across all use of force incidents – that included each force incident’s Level of force. The Department needs to ensure that it tracks this information so that it, rather than an outside a consultant like 21CP, can conduct many of the types of analyses discussed in Part I. In 2026, a municipal police department needs to maintain the ability *for itself* to analyze, critically self-evaluate, and identify trends in its performance.

Recommendation 7. APD should update and revise, as necessary, its use of force Level definitions to ensure greater clarity in incident reporting and data analysis.

Part I highlighted that APD currently considers some vehicle tactics that involve non-moving vehicles and where no vehicle contact is made as reportable use of force incidents. Specifically, vehicle boxing or blocking has typically been considered Level 1 force on the grounds that a vehicle could be a force instrument but, during a boxing or blocking maneuver, “no contact is made” – fulfilling the criteria of Level 1 force in Policy 3.05.020.¹⁵⁵

However, wherever application of the technique involves (as it is intended to ensure) no striking of a vehicle and does not, in fact, involve moving vehicles, blocking or boxing may effectuate a *seizure* under the Fourth Amendment – because an individual would not, under the circumstances, feel free to leave – but does not either constitute or typically run the risk of effectuating any physical *force*.

¹⁵⁵ Anchorage Police Department, Policy 3.05.020, “Reporting and Investigating Force” at § I(A)(1)(f) (last rev. Jan. 12, 2024) (defining Level 1 force as including where “[a]ny impact weapon, excluding specialty impact munitions, or any other instrument is used in an attempt to strike another person but **no contact is made**” (emphasis in original)).

Practically, counting boxing or blocking as Level 1 force may elevate demands on personnel in terms of reporting and reviewing incidents that do not actually involve tangible physical force as if they did. Additionally, including such incidents as Level 1 force runs the risk of artificially inflating the number of APD force incidents overall – incorrectly suggesting that officers are using force more frequently than they, in reality, do.

Consequently, 21CP recommends that APD revise its force Level definitions to clarify that vehicle tactics that involve non-moving vehicles and where no vehicle contact is made – namely, boxing and blocking techniques – do not constitute reportable force.

Recommendation 8. Officers involved in an officer-involved shooting should be assigned to duties other than in the field for a period of greater than the current four-day customary period.

21CP understands that, currently, officers who are involved in an officer-involved shooting are assigned out of the field for a period of, typically, four days. In some instances, 21CP observed that officers involved in officer-involved shootings were involved in significant force cases within just a matter of months. Although it is impossible to know whether or how the effects of prior incidents may have shaped later encounters, we recommend that the Department consider expanded pathways for officers to benefit from post-incident procedures, protocols, and support services designed to ensure that they do not return to the field before they are ready.

For these reasons, many agencies assign officers involved in an OIS to administrative duties (at the station or headquarters) for a comparatively longer period of time than APD does. This longer time period provides the agency with an opportunity to ensure that the officer is fully ready and equipped, from a well-being perspective, to engage in work in the field which might potentially subject them to encounters where they might face threats and critical decision-making surrounding force.

For example:

- **Los Angeles Police Department** – “Under no circumstances shall the officer(s) who discharged their weapons be returned to field duty until at least 14 *calendar* days have elapsed since the time of the incident . . . Prior to returning an employee to field duty, approval is required from the Chief of Police,” who is to consider the recommendation of Behavioral Science Services, which conducts “three mandatory, on-duty appointments for the employee(s) with BSS for a psychological evaluation by a licensed mental health professional.”¹⁵⁶
- **San Francisco Police Department** – “Officers who discharge a firearm in an officer-involved shooting will be reassigned to his or her respective Bureau Headquarters. Officers shall not return to regular assignment for a minimum of 10 calendar days. This reassignment is administrative only and in no way shall be considered punitive. Within 5 business days of an officer-involved shooting,

¹⁵⁶ Los Angeles Police Department, Special Order No. 29 (Dec. 9, 2020) at 6, 7, https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/09/SO-29_OFFICER-INVOLVED-SHOOTINGS-OR-IN-CUSTODY-DEATHS-INJURY.pdf.

the Chief of Police shall convene a panel to discuss whether it is appropriate for the involved member to return to duty.”¹⁵⁷

- **Chicago Police Department** – “Department members who have discharged a firearm, other than an unintentional discharge or solely for the destruction/deterrence of an animal where no one was injured, will be placed in a mandatory administrative duty assignment for a minimum period of thirty (30) days”¹⁵⁸

2. Use of Force Investigation, Review & Adjudication

Although use of force investigations were not squarely within the scope of 21CP’s assessment, the quality of investigations, and the integrity of procedures surrounding those investigations, directly shape the extent to which the Department can fully, fairly, and comprehensively review the incident and evaluate officer performance.

Recommendation 9. APD should continue to improve on the quality of use of force investigations by updating and enhancing applicable policies and protocols.

APD stakeholders suggested to 21CP that, historically, the Department struggled with ensuring meaningful oversight and accountability of use of force incidents. Several told 21CP that only one officer had ever been disciplined for an officer-involved shooting. Although independent verification of this fact implicates timeframes extending beyond 21CP’s focus, the predominant sentiment among personnel – that, under the current Chief, there has been a shift toward more meaningful supervision and comprehensive investigations of force – is noteworthy.

21CP’s review found that APD’s investigations have improved in their thoroughness – addressing material issues and exploring the relevant investigative avenues. Investigations conducted in 2025 showed particular improvement. Consequently, many of 21CP’s recommendations are aimed toward codifying the Department’s more recent practices or making further enhancements toward ensuring that all force investigations are fair, thorough, and complete.

Recommendation 9.1. APD should revise policies and procedures to ensure that all Level 1 force receives substantive supervisory review and that all Level 2 force investigations receive review from a more senior member of the command staff.

Current APD policy indicates simply that “[o]fficers shall notify their Supervisor after using all Level 1 hard empty hand control techniques and total restraints as soon as practical” – and that, as for force of any Level, “[o]fficers are required to provide a written narrative statement and complete the use of force tab” in the relevant APD system “prior to the completion of their tour of duty” following the incident.¹⁵⁹ Unlike with Level 2 and Level 3

¹⁵⁷ San Francisco Police Department, General Order 8.11, “Investigation of Officer Involved Shootings and Discharges” (last rev. Sept. 24, 2005), <https://www.sanfranciscopolice.org/your-sfpd/policies/general-orders/8-11>.

¹⁵⁸ Chicago Police Department, Chicago Police Department, “Firearms Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures” at 5 (Feb. 29, 2020), https://www.chicagopolice.org/wp-content/uploads/legacy/2020/02/GO3-02-03_Firearms-Discharge_DRAFT_28FEB20.pdf.

¹⁵⁹ Anchorage Police Department, Policy 3.05.020, “Reporting and Investigation Force” at § I(B) (last rev. Jan. 12, 2024).

force, APD policy does not identify specific post-incident supervisory investigative and review responsibilities. As set forth in policy, then, Level 1 reporting receives little, if any, formal review or post-incident analysis.

In many agencies that use similar force classification systems as APD, Level 1 force review occurs primarily at the level of the first-line supervisor – with that supervisor conducting some level of review “for consistency with all Departmental policies as pertains to:

- “Whether the Use of Force was Reasonable, Necessary, and Proportional”;
- “Whether the member used de-escalation techniques”;
- “Whether the member continuously assessed the situation prior to, during, and after the Use of Force”; and
- “The submission of required documentation and related evidence.”¹⁶⁰

Indeed, in many agencies, the determination of the first-line supervisor is followed by a condensed review by one or more higher-level supervisors.¹⁶¹ In this way, Level 1 force may not receive as much attention or follow-up review as higher-level force, but it does receive some meaningful, substantive review to ensure that the involved officer(s) adhered to departmental policy, training, and approved tactics. 21CP therefore recommends that APD update its policies to ensure that Level 1 force receive some type of substantive post-incident review by APD supervisors.

Relatedly, APD policy currently provides simply that a supervisor complete a Level 2 force investigation in the field and make associated findings. Proposed revised policy contemplates that a “Division Commander shall review a supervisor’s Level 2 reports/reviews.”¹⁶² 21CP agrees that APD policy should clarify that all Level 2 force investigations should be reviewed by someone beyond the investigating supervisor to ensure that the investigation is full, fair, and thorough and that the underlying conclusions are sound and adjudications are appropriate.

Recommendation 9.2. Investigative interviews involving Level 2 and Level 3 force should be video-recorded whenever possible. If video-recording is not feasible, interviews should be audio-recorded. If interviews are audio-recorded, they should be transcribed for all Level 3 use of force, rather than only summarized, to ensure clarity and avoid confusion among subsequent reviewers.

¹⁶⁰ Baltimore Police Department, Policy 725, “Use of Force Reporting, Review, and Assessment” at 5 (last rev. Apr. 29, 2024), <https://public.powerdms.com/BALTIMOREMD/documents/68102>.

¹⁶¹ See, e.g., Seattle Police Department, Policy 8,500, “Reviewing Use of Force” at POL-2 (last rev. Sept. 1, 2024), <https://public.powerdms.com/Sea4550/tree/documents/2042948> (“Type I use-of-force reports will be investigated and/or reviewed in the following order: 1. Sergeant, 2. Lieutenant, 3. Captain, or their designee”); Albuquerque Police Department, Standard Operating Procedure 2-57, “Use of Force: Review and Investigation by Department Personnel” at Section 2-57-5 (last rev. Jan. 26, 2023) (describing “Chain of Command Review of Level 1 Use of Force”), <https://documents.cabq.gov/police/standard-operating-procedures/2-57-use-of-force-review-and-investigation-by-department-personnel.pdf>.

¹⁶² Anchorage Police Department, Draft Policy Number 3.05, “Reporting and Investigation Force” at § D(3)(b).

As best practice guidance from the U.S. Department of Justice observes, “[e]lectronic recording of the live, word-for-word statements of all interviewees . . . is the best way to avoid interpretive errors in recounting statements.”¹⁶³ Although video recording is a preferred method, as it captures a wealth of information (“the interviewee . . . pointing to positions on a map, objects in a room, or otherwise physical re-creating an event that cannot be done fully in just words”) that other forms do not, all interviews should be recorded electronically.¹⁶⁴

Many APD force investigations, especially Level 3 investigations, involved interviews that were audio-recorded. In some instances, especially Level 2 incidents that 21CP reviewed, however, the statements of the subject of the use of force were not recorded. Further, not all audio-recorded interviews are transcribed and included in the investigative file.

Going forward, whenever possible, interviews in force investigations involving Level 2 and Level 3 use of force should be video-recorded. If that is not feasible, interviews should be audio-recorded and, for Level 3 force investigations, transcribed, with full transcripts included in the investigative file. Synopses or summaries of non-transcribed interviews in some investigative files did not always capture all of the relevant points in the comprehensive or complex way that listening to a full interview recording sometimes revealed. Speech recognition and artificial-intelligence platforms might assist the Department in generating high-quality interview transcripts without the investment of significant resources, and the inclusion of full interview transcripts can allow subsequent reviewers in the Department with a comprehensive, easier way to review an involved party’s complete interview.

Recommendation 9.3. Involved officers in force incidents investigated by IA should be accompanied by a supervisor from the field to the station, and not by other officers, in part to ensure the integrity of initial officer incident accounts.

Following a significant use of force – of the type that, at APD, is investigated by Internal Affairs – best practice indicates that involved and witness officers should all “be physically separated as soon as possible to avoid even the appearance of collusion.”¹⁶⁵ “Likewise, members of the agency either involved in or witnessing the critical incident should be ordered not to discuss the incident among themselves until after interviews of all involved agency members have been concluded and the employees have been explicitly authorized to discuss the matter.”¹⁶⁶

APD should require that, at the least, involved officers are accompanied by a supervisor from the field to the station or other APD location rather than other officers. A supervisor should be assigned to monitor involved officer(s) at the station or headquarters before they provide statements to ensure that interactions with other personnel do not contaminate an officer’s account. This can help to promote the integrity of the overall force investigation process and the idea that original officer incident accounts are not unduly impacted by discussion

¹⁶³ United States Department of Justice, Office of Community Oriented Policing Services, Standards and Guidelines for Internal Affairs: Recommendations from a Community of Practice 34 (2008), <https://portal.cops.usdoj.gov/resourcecenter/content.ashx/cops-p164-pub.pdf>.

¹⁶⁴ *Id.* at 35.

¹⁶⁵ U.S. Department of Justice, Office of Community Oriented Policing Services, Standards and Guidelines for Internal Affairs: Recommendations from a Community of Practice 42 (2008).

¹⁶⁶ *Id.*

with other officers. Some APD personnel suggested to 21CP that implementing this recommendation may pose some operational constraints and/or implicate provisions of the current collective bargaining agreement.

Recommendation 9.4. Investigative reports and/or files should clarify when officer body-worn camera was turned off following an officer-involved shooting, or other reportable force incident, as well as a description of the underlying circumstances.

Across 21CP's review of APD investigative files pertaining to officer-involved shooting incidents, relevant reports were not always clear about when involved or implicated officers turned their body-worn cameras off following the underlying incident. Going forward, files should regularly contain reflect this information. They should also describe the circumstances surrounding the camera being turned off (*i.e.*, precisely why the body-worn camera was switched off).

Recommendation 9.5. Policy should clarify primary investigators – including supervisors and IA – should focus on reporting the facts and circumstances of the incident. Investigators should not provide recommendations on the adjudication or disposition.

The role of primary investigators in reaching adjudication or disposition determinations – that is, whether any involved personnel violated policy in the investigated incident – can differ among police departments. Some police agencies do “not involve[e] the investigator in rendering a finding in the case or recommending the discipline to be imposed. In these agencies, the investigator is only a fact-finder who presents a case file to a review panel or board,” or supervisor.¹⁶⁷ This means that:

Once the investigation is complete, the investigator should analyze the issues, testimony, and materials; logically organize the presentation of facts; and write a comprehensive report . . .

The investigator must forward his or her report . . . Usually, the chief is responsible for determining the final disposition in the matter, but her or she can delegate this authority . . . [including] the head of, or a group within, the Internal Affairs unit; the subject officer's supervisor; an internal panel of police managers; or an oversight agency.¹⁶⁸

In other departments, “[a]t the conclusion of the investigation, the internal affairs investigator . . . shall make factual findings, summarize the matter, and indicate the appropriate disposition.”¹⁶⁹ This means that the investigator both makes factual findings and a determination about whether the investigation identified any policy violations.

¹⁶⁷ S. Rothlein & R. Lober, “Ramifications of Internal Affairs Investigations,” 63 *Police Chief* 37 (Apr. 1996).

¹⁶⁸ U.S. Department of Justice, Office of Community Oriented Policing Services, Building Trust Between the Police and the Citizens They Serve: An Internal Affairs Promising Practices Guide for Local Law Enforcement 26 & n.10, <https://portal.cops.usdoj.gov/resourcecenter/RIC/Publications/cops-w0724-pub.pdf>.

¹⁶⁹ Office of the Attorney General, State of New Jersey, *Internal Affairs Policy & Procedures* at 5.1.8 (Nov. 2022), https://images.law.com/contrib/content/uploads/documents/399/88919/ag-Directive-2022-14_Transparency-in-Internal-Affairs-Investigations.pdf.

21CP's review of investigative files identified some divergent practices with respect to the whether and how original investigators reach conclusions about adjudication. For a number of Level 3 incidents, the primary responsibility for adjudication appeared to fall on IA investigators—with subsequent reviewers using that initial determination as a clear baseline for their subsequent analysis. APD personnel indicated to 21CP that, for such IA investigations, the investigators involve their chain of command in the process of making those investigative conclusions.¹⁷⁰ For lower-level force investigations (*i.e.*, Level 2 investigations) supervisors complete both the “investigation and findings.”¹⁷¹

Going forward, investigative reports and summaries may be better, clearer, and more focused if APD policy more clearly indicates that the investigator's role is primarily to develop a factual record and reach evidence-based factual conclusions so that *someone else*, in the chain of command, can reach conclusions about what those facts mean in terms of ultimate adjudication (*i.e.*, whether the conduct was consistent or inconsistent with APD policy). The adjudication of serious use of force investigations should be the responsibility of the chain of command, with the ultimate decision maker being the chief of police for all officer-involved shooting.

Recommendation 10. To improve the capacity, continuity, and overall experience level of seasoned investigators, APD should consider adding at least one more investigator to Internal Affairs.

Staffing for Internal Affairs was reported to 21CP as very low: 2 investigators on a 3-year rotation. This means that, across the whole of the Department, there are two individuals responsible for conducting all Level 3 use of force investigations and all investigations of instances where officer misconduct may be alleged or implicated. To ensure high-quality, comprehensive misconduct investigations and post-force inquiries, 21CP recommends that APD consider adding at least one additional, full-time Internal Affairs investigator.

Recommendation 11. APD should continue to revise, update, and enhance its policies and procedures relating to the review of use of force incidents and the role of the Force Review Board.

A Force Review Board (“FRB”) typically reviews use of force incidents, and the investigation of such incidents, to determine both whether the incident raised any policy violations that should be addressed and, just as critically, if the incident raises any systemic, policy, training, tactical, equipment, supervision, or other departmental issues – so that lessons learned can be identified and meaningfully distributed across the police department. The following recommendations identify specific ways that APD should revise, update, and enhance its policies and procedures relating to FRB review of force incidents.

Recommendation 11.1. APD policy should require that the Force Review Board review and analyze all Level 2 and Level 3 use of force incidents.

Existing APD policies are inconsistent regarding precisely what incidents receive Force Review Board consideration. The currently effective version of Policy 3.05.020, “Reporting and Investigating Force,” indicates

¹⁷⁰ APD notes that Internal Affairs does not make recommendations as to specific discipline.

¹⁷¹ Anchorage Police Department, Operational Procedure 3.05.020, “Reporting and Investigation Force” at § D(2)(b)(8) (last rev. Jan. 12, 2024).

that the Deputy Chief, as part of their “review [of] all Level 3 Use of Force Investigations and findings” must either “determine if a Force Review is required” or, if it is not, “forward the investigation to the Chief of Police” who then “review[s] the entire investigation.”¹⁷² By these terms, only Level 3 incidents may be eligible for FRB review—Level 2 incidents are not mentioned in conjunction with Force Review—and a case is eligible for review only if the Deputy Chief determines that FRB should review it.

In contrast, the Department’s January 2025 memorandum outlining the basic roles and responsibilities of FRB provides that the “[f]orce to be reviewed” is “generally Level 2 according to” Policy 3.05.020 and includes:

1. Any head strike
2. Any use of an impact weapon or any other object with contact
3. Any use of a chemical agent
4. Any use of an ECW
5. Any bite by a police canine
6. Any use of force resulting in injury requiring medical treatment (beyond first aid) or hospital admittance¹⁷³
7. Any vehicle tactic resulting in injury requiring medical treatment (beyond first aid) or vehicle damage (beyond minor scuffs or paint transfer).¹⁷³

By the terms of the memorandum, then, the FRB primarily reviews Level 2, not Level 3 force. Critically, however, the above-cited list is not consistent with the definitions of force levels in current policy directive 3.05.020—which means that an FRB could very well review some Level 3 force but not necessarily all. For instance, the FRB would not necessarily, per the Memorandum’s terms, review a “critical firearm discharge” that did not cause an injury requiring medical treatment or hospital admittance.¹⁷⁴

Meanwhile, it appears that, in practice, *some*, but not all, Level 3 incidents, as determined by the Deputy Chief, have been going to FRB, while Level 2 incidents have not been considered by FRB. The Chief and other command staff members suggested to 21CP that they have been moving in the direction of the FRB considering both Level 2 and Level 3 force, but this had not been fully operationalized as of late 2025.

Force Review Boards in other jurisdictions frequently review at least some material set of intermediate-level/Level 2 force incidents.¹⁷⁵ APD’s FRB would benefit from consideration of intermediate-level force, especially in conjunction with surfacing trends or issues that might benefit from training, equipment, policy, data, or other administrative action (see Recommendation 11.3, below).

¹⁷² Anchorage Police Department, Operational Procedure 3.05.020, “Reporting and Investigating Force” at § I(E) (last rev. Jan. 12, 2024).

¹⁷³ Captain Jack Carson to All Sworn Personnel, Memorandum re: Force Review Board Update (Supersedes February 1, 2022, Memo) (Jan. 15, 2025) at Section I-(B).

¹⁷⁴ Anchorage Police Department, Operational Procedure 3.05.020, “Reporting and Investigating Force” at § I(A) (last rev. Jan. 12, 2024).

¹⁷⁵ See, e.g., Seattle Office of Inspector General, *Seattle Police Department Use of Force Assessment 22* (Feb. 29, 2024), https://www.seattle.gov/documents/departments/oig/standards%20and%20compliance/oig_useofforceassessment.pdf; Baltimore Police Department, Policy 725, “Use of Force Reporting, Review, and Assessment” at 11 (last rev. Apr. 29, 2024), <https://public.powerdms.com/BALTIMOREMD/documents/68102>.

Therefore, 21CP recommends that the Department update its policies and procedures relating to the FRB to make clear that the Board will consider all Level 3 or Level 2 force. If it is impractical from a time and resource perspective for FRB to consider all intermediate Level 2 force incidents, APD should either (a) specifically identify types or classes of Level 2 force that require consideration, or (b) in order to ensure that the Board is considering a material cross-section of Level 2 force, identify a specific mechanism for randomly selecting a representative portion of Level 2 force cases for FRB consideration.

In discussions with APD stakeholders, it appears that fully transitioning to the FRB considering Level 2 cases will entail a cultural shift within the Department. When 21CP asked some APD members about what might happen if Level 2 investigations were routinely reviewed by APD, the sense was that there may be some hesitancy. As one put it, “I don’t know if officers will be ready for this change. It’s change . . . there will be grumblings when this happens.”¹⁷⁶

Recommendation 11.2. APD policy should clarify that the FRB does not consider vehicle collisions that do not meet the definition of a use of force.

A 2025 memorandum on FRB suggests that the FRB must consider “[a]ny vehicle tactic resulting in . . . vehicle damage.”¹⁷⁷ This would appear to lead the Board to consider a number of incidents that may implicate driving tactics or vehicle issues but may not, on their face, implicate use of force issues.

However, APD maintains a separate review process for vehicle collisions that do not involve use of force issues. To ensure clarity, 21CP recommends that APD update policy guidance to ensure that the description of FRB’s scope does not include non-force-related vehicle collisions or incidents in which there has been damage to departmental vehicles.

Recommendation 11.3. APD policy and procedures should ensure that a part of the Force Review Board’s responsibilities include consideration of training, equipment, policy, data, and other implications.

According to the January 2025 memorandum, FRB responsibilities include analyzing:

1. Whether it was compliant with department policies, procedures and training when considering objectively reasonable standards of law;
2. Whether any involved department members’ actions leading up to the force created circumstances that lead to, or contributed to, the use of force; and
3. The other available options that could or should have been considered.¹⁷⁸

¹⁷⁶ Interview with APD Stakeholders (Aug. 26, 2025).

¹⁷⁷ Captain Jack Carson to All Sworn Personnel, Memorandum re: Force Review Board Update (Supersedes February 1, 2022, Memo) (Jan. 15, 2025) at § I-(B).

¹⁷⁸ Captain Jack Carson to All Sworn Personnel, Memorandum re: Force Review Board Update (Supersedes February 1, 2022, Memo) (Jan. 15, 2025) at § III.

Ultimately, “[a]t the conclusion of the board, the Unit Commander will complete a findings memo if the force was out of policy . . . The findings will be forwarded to the Division Commander . . . to determine discipline or training, if applicable, and close out the investigation.”¹⁷⁹

As constructed, then, the Board’s charge is predominantly to determine whether force was consistent or inconsistent with APD policy. Certainly, this is an appropriate, core part of what a body dedicated to reviewing officer force can and should do. However, this is not, by itself, as comprehensive as it could and should be.

Going forward, the FRB should be tasked with considered not simply whether a force incident may have implicated misconduct and/or policy violations but with a comprehensive, 360-degree, after-action inquiry geared toward identifying lessons learned and potential improvements for the Department generally and for involved personnel specifically.

This includes at least a few elements. First, as even “winning” teams watch game tapes to identify what went right, what went wrong, and what can be learned, APD’s Force Review Board should comprehensively consider what the Department and its personnel can learn from those use of force incidents where involved personnel performed capably, or where there were no injuries to subjects, officers, or others. Second, the Force Review Board should consider not just involved officer performance but the whole of the Department’s post-incident response, investigation, and review of the force incident to ensure that APD’s processes are as full, fair, and comprehensive as possible. Third, FRB should systematically consider whether force incidents revealed policy, training, equipment, or tactical issues or needs—with a focus on what the Department can do, systematically, to ensure that lessons learned are disseminated to all personnel and/or drive the continuous refinement and updating of force policies, training, and procedures. Finally, FRB can also identify trends across incidents in terms of force dynamics, officer performance, incident characteristics, and the like.

A number of police departments have codified this type of diverse responsibility set in specific policies and directives. For example:

- **Albuquerque Police Department** – “FRB will evaluate:
 - i. Whether the investigation is thorough and complete
 - ii. Whether the force was consistent with department policy and training
 - iii. Whether the investigator’s findings are supported by a preponderance of the evidence
 - iv. Whether, with the goal of continual improvement, there are considerations that need to be addressed regarding
 - Equipment
 - Tactics (including de-escalation and best practices)
 - Training
 - Policy
 - Supervision
 - v. Whether the chain of command appropriately identified and took actions to correct any deficiencies in the way the incident was handled

¹⁷⁹ *Id.*

- vi. Whether the chain of command appropriate identified and took actions to correct any deficiencies in the investigation or report
- vii. Confirm that uniform standards were applied in use of force investigations and discipline
- viii. Identify instances, trends, or patterns of deficiencies regarding policy, training, equipment, or tactics.
- ix. Monitor all aspects of the department's use of force practices with the goal of continual improvement.”¹⁸⁰

Accordingly, 21CP recommends that APD update its policies and procedures relating to the Force Review Board to both clarify and expand the scope of its roles, duties, and scope of inquiry.

Recommendation 11.4. APD should work to ensure that APD supervisors who believe that they cannot serve as an impartial party recuse themselves from the force review.

APD should ensure that it maintains clear police guidance as to when, and how, supervisors should recuse themselves from considering a force incident because of a personal or professional relationship, or some other reason, that might raise the possibility or appearance of bias. Although 21CP did not identify this as a significant substantive issue in the incidents and investigations that it reviewed, policy language aimed toward eliminating any perception of bias can promote the values of fairness internally and transparency externally.

Recommendation 11.5. APD should revise and refine its use-of-force adjudication categories to ensure that the focus of the adjudication is on whether officers performed consistent with APD policy.

Current APD policy outlines four “findings,” or adjudication categories, for use of force incidents. They serve as the final administrative determination on whether involved personnel performed appropriately during a use of force encounter. The current four categories are:

- 1) **Justified, Within Department Policy** – [A] use of force is determined to be justified and during the course of the incident the subject Officers did not violate a Department policy.
- 2) **Justified, Not Within Department Policy** – [A] use of force is determined to be justified, but during the course of the incident the subject Officers violated a Department policy;
- 3) **Justified, Training Opportunity** – [A] use of force is determined to be justified, no Department policy violations occurred but the investigation revealed tactical error(s) that could be addressed through non-disciplinary tactical improvement training; or

¹⁸⁰ See, e.g., Albuquerque Police Department, SOP 2-56, “Force Review Board” (last rev. Apr. 25, 2016), <https://www.cabq.gov/police/documents/2-56-force-review-board.pdf>.

- 4) **Not Justified, Not within Department Policy** – [A] use of force is determined to be not justified, and during the course of the incident the subject Officer violated Department policy.¹⁸¹

All four adjudication categories expressly focus on “justification” and indicate, in their language, that this determination of whether the force was “justified” is separate and distinct from APD policy—such that something could, in fact, be “justified” but “not within department policy.”

It appears to 21CP, based on reviews of Level 3 and Level 2 force investigations, that the nature of these adjudication categories aligns with the broader Departmental emphasis—described elsewhere in this report—on considering the moment that force was deployed rather than on the whole of the circumstances and tactics at issue. Ultimately, the Department appears, at times, to be focusing, during its inquiries into whether an employee did or did not comply with their employer’s rules, narrowly on the kind of legal analysis of an officer’s ability to defend themselves or others from the threat of serious bodily injury or death that is typically at issue when considering whether an officer’s force violates a state criminal standard. However, in the same way that all of the circumstances leading and related to the application of force are relevant to the totality of the circumstances inquiry with respect to the constitutional inquiry,¹⁸² the Department must consider the whole of an officer’s performance during a force incident and whether it did or did not align with all of its policies. To that end, 21CP saw little evidence of force reviewers considering, or discussing, the particular provisions or language of APD’s force policy—which is rendered irrelevant unless reviewers specifically consider whether officer performance did or did not comply.

21CP recommends that APD eliminate the existing force adjudications in favor of a determination as to whether the performance of involved personnel was consistent with department policy. To this end, reviewers—including supervisors and the FRB—must rigorously consider whether officers did or did not follow the specific provisions of APD’s force policy that were implicated by the facts and circumstances at issue—so that the final determination is not merely that some aspect of an officer’s performance was “out of policy” but, instead, violated or was inconsistent with *some specific policy provision*. For those instances where force was consistent with policy but, nevertheless, reviewers identified tactical issues, reviewers should make a separate determination as to whether any performance might warrant follow-up.

Recommendation 11.6. Following the final adjudication of an OIS, APD should conduct a sit-down tactical debrief involving all significantly involved personnel to identify strengths and weaknesses of performance, as well as lessons learned – regardless of whether the Department found that any involved personnel violated policy.

Consistent with the rationale discussed in Recommendation 11.3, the Department should establish a mechanism for conducting an in-person, tactical debrief for all significantly involved personnel in use of force incidents at the conclusion of all Level 2 and Level 3 force investigations and review processes. This should include all instances where the underlying review has indeed identified no significant misconduct or policy issues.

¹⁸¹ Anchorage Police Department, Operational Procedure 3.05.020, “Reporting and Investigating Force” at Section I(D)(2)(d) (last rev. Jan. 12, 2024).

¹⁸² *Barnes v. Felix*, 605 U.S. ____ at 5 (2025).

Recommendation 12. Even as APD has taken tangible strides to be substantially more transparent at present than it was in the past with respect to officer-involved shootings, the Department should relay, both internally and externally, the internal outcomes/adjudications of investigations of officer performance during officer-involved shootings.

21CP heard from several community members, a number of APD personnel, and several Anchorage stakeholders that the Department currently is more transparent than it was in previous eras. This is evidenced, in part, by its release of critical incident videos relatively soon after the incident occurs (including body-worn camera footage), conducting two press conferences following an officer-involved shooting, and not defaulting immediately to saying that officers did everything right. As one Municipality of Anchorage stakeholder summarized, comparing APD currently to prior eras, “[b]etween then and now, the transparency now is so much higher. Chief is not trying to conceal anything, really.”¹⁸³ A community member similarly noted, “This transparency is not something I’ve seen in the past and at least releasing information – this is a good thing.”¹⁸⁴ Multiple community members suggested that, under current leadership, “[e]ven if something bad does happen in the Department, I have confidence in the Department to fix it and to hold people accountable”¹⁸⁵—even as many others described a historical “mistrust of the Police Department within my community” and the sense that their “community does not feel that the PD is ‘safety and protection.’”¹⁸⁶ An Anchorage stakeholder observed that “I would say relationships are fractured with the community at this time,” with the perception that “the use of force incidents primarily involve the BIPOC community . . . [where] there is a history of mistrust.”¹⁸⁷

To build on this early transparency following an officer-involved shooting, APD should clearly and transparently communicate to the community the final outcomes of officer-involved shooting adjudications—that is, what the Department’s final determination is with respect to whether involved officer(s) followed APD policy. Additionally, the Department should communicate about other follow-up or action steps that the incident has inspired (e.g., training, policy, equipment, or other internal process changes).

This transparency also appears to be important from an internal perspective. One officer, summarizing the views of several, told 21CP, “We need transparency internally within the Department, too. We are all about transparency externally, but we need it internally, too.”¹⁸⁸ As one APD officer put it specifically in the context of critical use of force incidents and investigations:

I think where we can be better is having those conversations [about use of force incidents] more out in the open . . . When IA gets involved [to conduct an investigation], it becomes secret . . . Then, [the] officer gets disciplined and all you ever hear is that they got disciplined – but there are 17 different stories on what actually happened [circulating within the Department].¹⁸⁹

¹⁸³ Interview with Anchorage stakeholder (Oct. 8, 2025).

¹⁸⁴ Focus Group with Community Stakeholders (August 25, 2026).

¹⁸⁵ Interview with Community stakeholder (Sept. 24, 2025).

¹⁸⁶ Interview with Community stakeholder (Sept. 29, 2025).

¹⁸⁷ Interview with Anchorage Stakeholder (Oct. 6, 2025).

¹⁸⁸ Focus Group with APD Stakeholders (Feb. 26, 2025).

¹⁸⁹ Interview with APD Personnel (Aug. 25, 2025).

APD indicated to 21CP that implementation of this recommendation may pose implications for the current collective bargaining agreement with the Anchorage Police Department Employees' Association.

Recommendation 13. APD should update and enhance protocols related to post-event support for families and impacted parties following officer-involved shootings and other critical incidents.

In discussions with community members—including legal counsel representing family members of individuals involved in officer-involved shootings—we heard recurring comments regarding APD's treatment of witnesses and family members during and following critical incidents.

Specifically, in at least one instance, family members reported being held at APD headquarters for several hours without being informed of their loved one's death or being permitted to go to the hospital to be at their bedside. 21CP heard in an interview about another instance in which a witness in a car at the time of an officer-involved shooting was purportedly not treated with care, and that APD officer(s) "ripp[ed] her from the car, slammed her, and put her in custody for thirteen hours."¹⁹⁰ Another interviewee told 21CP about an officer-involved shooting where an individual was reported as waving (what turned out to be identified as a) BB gun, and when APD officers arrived on scene to respond to the call, they immediately took the sibling of the individual waving the gun to the police station, and it was during that time, that the individual was shot and killed by officers.¹⁹¹ Other complaints centered around family members being treated as suspects, directed to accompany officers to APD headquarters, and left waiting for extended periods with little or no communication. Others described what they perceived to be a lack of cultural competence in APD's interactions with family members and other impacted parties—both in the immediate aftermath of incidents and in the weeks and months that followed.¹⁹²

Additionally, several individuals expressed frustration with a lack of timely and direct information regarding the status and findings of APD's investigations—with many often learning of developments only through media reporting rather than directly from the Department. At the same time, 21CP did hear some evidence that APD's current Chief has been perceived as being better with community and with the family members of individuals involved in officer-involved shootings.¹⁹³

21CP Solutions recommends that APD institute clear, standardized protocols governing interactions with family members and other impacted parties following officer-involved critical incidents. These protocols should address timely access to information regarding the medical status of loved ones; facilitate transportation or other logistical support to hospitals or other relevant locations; and identify resources for emotional and psychological support in the immediate aftermath.

In addition, APD should designate an individual with appropriate temperament and cultural sensitivity to serve as a consistent point of contact for family members and other impacted parties. This individual would be responsible for providing timely, accurate information and periodic updates regarding the investigative process and adjudication. Protocols should also include advance access for family members to view Critical Incident Video

¹⁹⁰ 21CP interview with Community Stakeholder (Oct. 9, 2025).

¹⁹¹ 21CP interview with Community Stakeholder (Oct. 8, 2025).

¹⁹² 21CP interview with Community Stakeholder (Sept. 9, 2025).

¹⁹³ 21CP interview with Community Stakeholder (Oct. 9, 2025).

Briefings and prior notification of investigative outcomes and prosecutorial decisions regarding the actions of APD personnel.

C. Additional Policies, Processes & Training Addressing Circumstances and Dynamics Often Relating to Use of Force

As Part I of this report describes, the use of vehicle blocking, pinning, and the PIT maneuver were implicated in a number of cases that ultimately involved the use of force involving something other than an officer's vehicle. In several instances, the use of such vehicle techniques appeared to have placed officers at an elevated risk of harm under the circumstances. In others, the vehicle technique itself constituted a use of force, because the officer vehicle(s) made contact with a subject vehicle, and 21CP reviewers had concerns about the appropriateness of the force—believing that other tactics may have better promoted public safety.

Consequently, this section of the report describes several recommendations related to vehicle tactics and vehicle pursuits.

Recommendation 14. APD should revise and update its Vehicle Tactics and Vehicle Pursuit policies, and update associated officer training, to promote greater clarity about officer decision-making regarding whether to initiate, continue, and/or terminate a pursuit. Included in this decision-making should be a careful balancing of public safety risks.

APD policy 3.06.005, “Vehicle Tactics,” addresses the use of techniques including “perimeters, roadblocks, blocking and pinning maneuvers, and the Pursuit Intervention Technique [PIT]” that may be used to “prevent[] the escape of prisoners and/or suspects.”¹⁹⁴ Policy 3.06.015, “Vehicle Pursuits,” specifically addresses the “active attempt by one or more police Officers to apprehend a suspect who is attempting to avoid apprehension by eluding.”¹⁹⁵ 21CP reviewed both currently effective policies and a potential revision provided by APD in Fall 2025 that combines the “Vehicle Tactics” and “Vehicle Pursuits” policies into a standalone policy.

Recommendation 14.1. The Vehicle Tactics policy should be clearer about what constitutes an “imminent” risk and/or threat.

In APD's current Vehicle Tactics policy, the concept of “imminent” risk, threat, or danger is important with respect to when officers may use pinning and the PIT maneuver. Specifically, to conduct “a vehicle pinning maneuver . . . to stop a fleeing suspect vehicle,” which “may involve an intentional collision with a slow-moving vehicle,” officers must have “reasonable suspicion that the suspect has committed a felony person crime and is an imminent risk to Officers or citizens if not immediately apprehended.”¹⁹⁶ Meanwhile, to conduct the PIT maneuver, officers must be able to “verbalize their belief that the continued movement of the [in-progress] vehicle pursuit places the public in imminent danger or harm” and that “[t]here is apparent risk of harm or imminent danger to the public if the suspect is not immediately apprehended.”¹⁹⁷

In the current policy, “imminent risk” is not defined. In the revised, proposed policy covering vehicle tactics and pursuits, “imminent threat” is defined as:

¹⁹⁴ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Pursuits/Tactics” at 1 (last rev. Dec. 8, 2022).

¹⁹⁵ Anchorage Police Department, Policy No. 3.06.015, “Vehicle Pursuits” at 2 (last rev. Dec. 8, 2022).

¹⁹⁶ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Pursuits/Tactics” at § II-C (last rev. Dec. 8, 2022).

¹⁹⁷ Anchorage Police Department, Policy No. 3.06.015, “Vehicle Pursuits” at 6–7 (last rev. Dec. 8, 2022).

An officer's reasonable perception of impending danger, death, or serious injury from any action or outcome that may occur during an encounter. A subject may pose an imminent or impending threat even if they are not pointing a weapon at the officer, but has, for example, a weapon within reach, is running for cover carrying a weapon, or running to a place where the officer has reason to believe a weapon is available.¹⁹⁸

We observe that this definition of "imminent threat" is problematic to the extent that it describes a subject as having a weapon merely within reach as an *imminent* threat. Although these circumstances may pose a significant and elevated risk, this conception of "imminent" is overly attenuated as drafted.

Although the draft policy continues to also use the terminology of "imminent danger" and "imminent harm," as well, we assume that the use of "danger" and description of significant types of "harm" in the above definition of "imminent threat" means that the same, or substantially similar, conception holds when those closely-related, alternate terms are used.

Under the revised policy, an officer's "reasonable conclusion" that "[t]he imminent threat of death or serious physical injury posed by the suspect is greater than the potential danger that the pursuit poses to the public" is sufficient grounds to initiate a pursuit.¹⁹⁹ Officers may "engage and continue in a pursuit . . . when officers can articulate the exigent need to apprehend the suspect(s) because of the imminent threat to the public."²⁰⁰ Elsewhere, vehicle pinning remains authorized when officers have "reasonable suspicion that the suspect has committed a felony person crime and is an imminent risk to officers or citizens if not immediately apprehended."²⁰¹ The PIT maneuver is authorized "[w]hen the officer(s) can verbalize their belief that the continued movement of the vehicle pursuit places the public in imminent danger or harm."²⁰²

Reading these substantive policy provisions in light of the proposed, revised definition of "imminent" threat or risk, officers are authorized to pin a vehicle, pursue a vehicle, or effectuate the PIT maneuver even in those instances where a subject poses a possible risk or threat but the nature of that is still attenuated and insufficiently concrete. As with conceptions of "imminence" elsewhere in APD policy, 21CP recommends that the Department revised policies to ensure a broader understanding that *possible* proximity to a weapon or *potential* risk that is not yet realized does not constitute sufficiently "imminent" threat or risk to justify the various types of higher-significance vehicle techniques like pursuits, pinning, and the PIT maneuver, or the use of deadly force. Ultimately, an imminent threat exists when, based on the totality of the circumstances, an officer reasonably believes that a person has the intent, opportunity, and ability to cause death or serious bodily injury and danger is immediate – meaning that it is about to occur or is already occurring.

Recommendation 14.2. The definition of "public risk" should be expanded to encompass the risk posed to the public by a suspect fleeing and/or an officer engaging in a pursuit.

¹⁹⁸ Proposed Revision to Policy 3.06, "Vehicle Pursuits/Tactics" at 2.

¹⁹⁹ *Id.* at 4–5.

²⁰⁰ *Id.* at 5.

²⁰¹ *Id.* at 13–14.

²⁰² *Id.* at 16.

The proposed, revised Vehicle Pursuits/Tactics policy also introduces, appropriately, the concept of Public Risk, defined as “[t]he degree of risk to the public posed by the actions of the suspect,” which “is generally comprised of . . . : the risk inherent in the initial act or crime committed by the suspect, and the risk faced by the public should the suspect be allowed to escape and remain at large.”²⁰³ As described previously, the policy authorizes pursuits “when officers can articulate the exigent need to apprehend the suspect(s) because of the imminent threat to the public (Public Risk).”²⁰⁴

21CP recommends that APD revise this definition of Public Risk to encompass the risk posed to the public by the pursuit itself. The policy elsewhere appropriately requires officers to expressly weigh “the risks involved with initiating or continuing a pursuit . . . and assess if the risks associated with the pursuit outweigh the possible benefits,” listing a number of concrete factors that bear on this analysis (*e.g.*, “[t]raffic density/pedestrian volume and population density,” “[s]peed involved,” “[c]haracteristics of driving behavior exhibited by the suspect(s), etc.”).²⁰⁵ Consequently, our recommendation is to ensure that the conception of Public Risk that permits a pursuit be specifically linked to the risks, identified elsewhere in policy, that starting or continuing a pursuit may itself cause.

Recommendation 14.3. Clearer guidance should be provided about the use of roadblocks.

Current policy indicates that “[p]lacing any vehicle directly in the path of an oncoming pursuit in an effort to make the violator slowdown is NOT a valid roadblock technique” but subsequently provides that application of the technique “can constitute the use of deadly force and shall only be used if all other methods of capture have been unsuccessful, and the situation warrants application of this level of force.”²⁰⁶

Thus, on the one hand, policy indicates that placing a vehicle in the path of a pursued vehicle should not be deployed, but, on the other, suggests that officers can deploy the technique if deadly force is justified and all other methods of taking the subject into custody have been tried and failed. The Department should determine whether this technique is *per se* prohibited or if, instead, it might be deployed under certain circumstances—and, if countenanced in some circumstances, provide additional parameters addressing deployment. 21CP generally agrees with the approach of the many agencies that simply prohibit the deployment of roadblocks as a means of stopping a fleeing vehicle:

- **Police Executive Research Forum** – “Agency policy should prohibit roadblocks . . . and any other tactic that involves using a law enforcement vehicle to forcibly stop a fleeing suspect vehicle.”²⁰⁷

²⁰³ Proposed Revision to Policy 3.06, “Vehicle Pursuits/Tactics” at 2.

²⁰⁴ *Id.* at 5.

²⁰⁵ *Id.* at 5–6.

²⁰⁶ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at Section IV-J-2-c-2 (last rev. Dec. 8, 2022).

²⁰⁷ Police Executive Research Forum, *Vehicular Pursuits: A Guide for Law Enforcement Executives on Managing the Associated Risks* 7 (2023).

- **Dallas Police Department** – “Prohibited Practices” during a pursuit include “[s]etting up roadblocks to stop violators.”²⁰⁸
- **Jacksonville Police Department** – “The Jacksonville Police Department prohibits the use of roadblocks. A roadblock is a restriction, obstruction, or device used or intended for the purpose of preventing free passage of motor vehicles on a roadway in order to apprehend a subject.”²⁰⁹
- **Harris County (Texas) Sheriff’s Office** – “Because of the dangers involved, the use of roadblocks to stop fleeing vehicles shall not be deployed.”²¹⁰

Recommendation 14.4. APD should ensure clarity regarding officer responsibilities to continually evaluate the risks associated with an in-progress pursuit.

As a general matter, police “[a]gency policy should list key factors in assessing the risk of a pursuit and make clear that officers must assess these factors both before initiating a pursuit and continuously as the situation changes.”²¹¹

As noted previously, existing APD policy appropriately lists a number of critical factors that an officer must weigh.²¹² Some elements of APD policy appropriately allude to the obligation of officers engaged in a pursuit to continuously assess the risks of continuing a pursuit (e.g., “Officers involved in a pursuit must continually question the wisdom of continuing.”²¹³). However, other policy language in proposed draft updates to Policy 3.06 suggests that “[o]bservations observed after the pursuit is initiated may not be used . . . to justify continuing a pursuit”²¹⁴—which, as worded, inappropriately suggests that officers should not continually weigh and assess the risk factors associated with an in-progress pursuit.

21CP recommends that APD update its Vehicle Pursuits policy to ensure that there is no ambiguity about the duty of involved officers to continually assess risk factors—both when deciding whether to initiate a pursuit and then continually once a pursuit has been initiated.

Recommendation 15. APD should revise and update its Vehicle Pursuit policy, and update associated officer training, to better promote officer safety and the effective resolution of situations involving individuals fleeing in vehicles.

²⁰⁸ Dallas Police Department, Policy 301.00, “Emergency Vehicle Operation” at Section 301.07(G) (last rev. July 20, 2021), https://www.dallaspolice.net/resources/Pages/General_Orders_300_Combined.aspx.

²⁰⁹ Jacksonville Police Department, Policy 16-1, “Emergency & Pursuit Driving” at Section VII(B) (last rev. Jan. 19, 2022), <https://www.cityofjacksonville.net/DocumentCenter/View/6721/16-1-Emergency-and-Pursuit-Driving?bidId=>.

²¹⁰ Harris County Sheriff’s Office, Policy 803, “Vehicle Pursuits” at § Q(4), <https://hcsopolicy.com/policy/803-vehicle-pursuits/> (last visited Feb. 6, 2026).

²¹¹ Police Executive Research Forum, *Vehicular Pursuits: A Guide for Law Enforcement Executives on Managing the Associated Risks* 2 (2023).

²¹² Anchorage Police Department, Policy No. 3.06.015, “Vehicle Pursuits” at Section IV(E) (last rev. Dec. 8, 2022).

²¹³ *Id.* at § VII (last rev. Dec. 8, 2022).

²¹⁴ *Id.* at § IV-B-5.

Recommendation 15.1. To enhance officer-safety, APD should modify its Vehicle Tactics policy to either prohibit or more specifically describe the potentially heightened risks of using Blocking and Rolling-Box in situations where officers reasonably believe that the vehicle occupants are armed with a firearm or are implicated in an original criminal offense that involved the use of a firearm.

Current APD policy describes “blocking” as “[a] tactical maneuver utilizing police vehicles to stop a suspect vehicle from fleeing, by blocking its path of escape without intentional vehicle contact.”²¹⁵ A “rolling-box” is a “type of block which involves police vehicles being used to surround a slow-moving vehicle or a vehicle which has not attempted to elude, on all sides and then slowing all vehicles to a stop, preventing a suspect from continuing in the vehicle.”²¹⁶ Although “[m]inor contact between the involved vehicles may occur” during the application of the “rolling-box” maneuver, contact between vehicles is neither intended to occur nor typical during the use of standard blocking or the “rolling-box” type of blocking.

Current APD policy language does address officer safety considerations. Specifically, “[o]fficers should not put themselves or others at unreasonable risks when deploying a blocking or pinning maneuver.”²¹⁷ Additionally, “[s]pecial care must be taken when deploying a blocking or pinning maneuver when the suspect is believed to be armed with a firearm. In most cases the application of a ‘high-risk takedown’ may be more appropriate.”²¹⁸ For this reason, a policy provision that is somewhat buried provides that “[t]he ultimate decision to block or pin in such a vehicle shall reside with the Supervisor and/or commander in charge of the incident.”²¹⁹

Despite this policy guidance, as Part I of this report describes, 21CP reviewers identified that, in practice, APD officers in several instances blocked vehicles where the occupants were implicated in an original criminal offense involving the use of a firearm or where the officers reasonably believed a vehicle occupant was armed with a firearm. In these circumstances, the use of a blocking maneuver may have compelled officers to close their distance with a subject with a reasonable likelihood of constituting a threat, placing them at elevated risk and perhaps making it more likely that force would need to be deployed to resolve the situation. It was not readily apparent across these cases that a supervisor or commander had authorized the use of a blocking tactic before it was utilized; instead, the blocking of a suspect vehicle by APD vehicles appeared to be something closer to a standard strategy automatically employed by APD officers themselves with minimal advance coordination.

Consequently, 21CP recommends that APD policy either (a) prohibit the use of blocking and rolling-box tactics when officers reasonably believe that vehicle occupants are armed or implicated in an original criminal offense involving the use of a firearm, or (b) describe more specifically the potentially significant risks of deploying the techniques when a subject may be armed and suggest that such techniques are disfavored under those circumstances. Especially as proposed policy updates eliminate the “special care” language cited above regarding application of blocking or pinning “when the suspect is believed to be armed with a firearm,” we recommend that the Department consider additional policy enhancements that directly address these potential risks.

²¹⁵ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 1 (last rev. Dec. 8, 2022).

²¹⁶ *Id.*

²¹⁷ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 5 (last rev. Dec. 8, 2022).

²¹⁸ *Id.*

²¹⁹ *Id.*

Recommendation 15.2. To promote officer safety, APD should limit the use of the “pinning” vehicle tactic to appropriately trained, specialized tactical units equipped with vehicle and other ballistic protection. Additionally, policy should more specifically define the vehicle speeds at which a pinning maneuver may be deployed.

APD policy describes “pinning” as “[a] tactical maneuver utilizing police vehicles to stop or contain a stopped or slow-moving suspect vehicle from fleeing, by use of a reasonable vehicle contact.”²²⁰ “While this action may involve physical contact with the suspect vehicle, caution shall be used that the . . . pinning technique does not become a ramming,”²²¹ with “ramming” defined as officers causing “an intentional collision under circumstances that create a substantial risk of causing extensive property damage and death of serious physical injury,” which “should be utilized only when deadly force is justified.”²²² In best practice guidance, the Police Executive Research Forum cites pinning as “[o]ne exception” to what should be a general prohibition on “[i]ntervention tactics that use law enforcement vehicles to forcibly stop a fleeing vehicle” because “[t]he use of police vehicles to pin a suspect vehicle in place, rather than to forcibly stop a fleeing vehicle, presents a lower risk of injury and may be justified to prevent the suspect from fleeing.”²²³

Current APD policy authorizes pinning when there is “reasonable suspicion that the suspect has committed a felony person crime and is an imminent risk to Officers or citizens,” “[o]ther attempts to stop the vehicle such as blocking are inappropriate or have failed and the Officer(s) has reasonable suspicion to believe the suspect has committed a misdemeanor or felony crime,” and “[a]t Supervisor or Commander direction.”²²⁴ These parameters are preserved in proposed draft policy updates that 21CP reviewed.

Although the “special care” instruction to officers regarding application “when the suspect is believed to be armed with a firearm” discussed in the context of Recommendation 15.2 expressly applies to pinning, the additional risks associated with effectuating a tactic when vehicles are moving—even if at a comparatively “slow speed”—point toward APD’s best course of action being both (a) prohibiting the use of pinning when officers reasonably believe that vehicle occupants are armed or implicated in an underlying criminal offense involving the use of a firearm, and (b) permitting pinning only by specialized tactics and specifically trained personnel who are equipped with vehicle and other ballistic protection.

Additionally, current policy contemplates the deploying of pinning “[w]hen a suspect vehicle is . . . moving at a slow speed.”²²⁵ However, “slow speed” is neither defined nor discussed further. Because of the risks associated with colliding with a moving vehicle, discussed further within the context of Recommendation 15.3 and Recommendation 15.4 below, and the need that APD policy does identify to ensure that an attempt at “pinning” does not become *de facto* “ramming,” revised APD policy should provide specific guidance on the speeds at which an authorized pinning technique might be appropriate.

²²⁰ *Id.* at 1.

²²¹ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 5 (last rev. Dec. 8, 2022).

²²² *Id.* at 2.

²²³ Police Executive Research Forum, *Vehicular Pursuits: A Guide for Law Enforcement Executives on Managing the Associated Risks* 80 (2023).

²²⁴ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 6 (last rev. Dec. 8, 2022).

²²⁵ *Id.* at 4; *accord id.* at 5 (“A vehicular pinning maneuver may involve an intentional collision with a slow-moving suspect vehicle.”).

Finally, APD policy should emphasize more clearly that pinning is contemplated as a way not of intervening in an active pursuit but of precluding flight. That is, pinning “should be viewed as a pursuit alternative rather than an intervention.”²²⁶

Recommendation 15.3. APD should consider prohibiting “ramming” subject vehicles. If “ramming” is permitted, it should be used only when deadly force is authorized and supervisor approval has been obtained.

Current APD policy provides that “ramming,” or creating “an intentional collision under circumstances that create a substantial risk of causing extensive property damage and death or serious physical injury,” constitutes “deadly force.”²²⁷ However, policy does not provide specific parameters or guidance beyond this in the manner that it does with blocking, pinning, and rolling-box techniques.

Many police departments simply prohibit “ramming”:

- **Honolulu Police Department** – “Vehicles used for law enforcement purposes . . . shall not be used to block, contain, or ram a subject’s vehicle.”²²⁸
- **Memphis Police Department** – “In vehicle pursuits, the use of any of the following actions is prohibited: . . . Using the police vehicle as a battering ram to force the vehicle being pursued to stop.”²²⁹
- **Fayetteville (North Carolina) Police Department** – “Officers will not use police cars to make deliberate contact with the suspect vehicle (ram) or force the pursued vehicle into parked vehicles or fixed objects.”²³⁰

The reason is that “[t]he potential for serious injury is so high that few, if any, situations would justify this risk.”²³¹ Some departments do permit ramming but impose “severe[] restrict[ions].”²³² In addition to requiring, as APD policy does now, that deadly force be authorized, a supervisor should be required to approve ramming, which proposed APD policy updates include (“If possible,” ramming “will be approved by a supervisor.”).²³³

Recommendation 15.4. To ensure public and officer safety, APD should consider updating existing policy guidance regarding the Pursuit Intervention Technique to (a) limit

²²⁶ Police Executive Research Forum, *Vehicular Pursuits: A Guide for Law Enforcement Executives on Managing the Associated Risks* 80 (2023).

²²⁷ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 2 (last rev. Dec. 8, 2022).

²²⁸ Honolulu Police Department, “Vehicle Pursuits,” <https://www.honolulupd.org/policy/policy-motor-vehicle-pursuits/> (last accessed Feb. 7, 2026).

²²⁹ Memphis Police Department, Policy and Procedures, Chapter XIII, “Police Vehicle Operation/Pursuit Policy” at 8 (Apr. 5, 2021), <https://www.honolulupd.org/policy/policy-motor-vehicle-pursuits/>.

²³⁰ Police Executive Research Forum, *Vehicular Pursuits: A Guide for Law Enforcement Executives on Managing the Associated Risks* 80 (2023) (quoting Fayetteville (North Carolina) Police Department, Written Directive 4.2, “Vehicle Operations and Pursuits”).

²³¹ *Id.*

²³² *Id.*

²³³ Anchorage Police Department, Proposed Policy Changes, Policy 3.06, “Vehicle Pursuits/Tactics” at § IV-J-3-a.

the deployment of the PIT maneuver to situations where the maximum vehicle speed is 35 miles per hour, and rely on spike strips or other tire deflation devices for higher-speed pursuits, and (b) prohibit the use of the PIT maneuver and spike strips to areas where the risk of the subject losing control of the car and injuring members of the public is high.

Part I of this report previously described the Pursuit Intervention Technique (the “PIT” maneuver). Generally, we agree with a recent Police Executive Research Forum report’s conclusion that “the PIT maneuver is a high-risk technique for ending a pursuit that is not recommended.”²³⁴ However, that report, like 21CP, recognizes that there is not yet a clear “consensus” in the field “on the issue of whether PIT maneuvers should be prohibited outright or permitted in certain narrowly defined circumstances.”²³⁵

To this end, some police departments expressly prohibit the use of the PIT maneuver.²³⁶ Others allow the use of the PIT maneuver but classify it as deadly force, especially when deployed at a moderate or higher rate of speed.²³⁷ Still others allow it to “be undertaken by properly trained officers who have received authorization from the pursuit’s supervisor, when the eluding vehicle presents risk that outweigh the risks of the intervention tactic.”²³⁸

Current APD policy permits the deployment of the PIT maneuver, which, given that it involves the striking of a moving vehicle at some significant speed, constitutes a use of force. This includes both instances in which involved vehicles are moving at above 45 miles per hour, where deployment would constitute deadly force, and below 45 miles per hour, where deployment “may be considered as less than lethal force due to a lower risk of serious physical injury and death.”²³⁹

This authorization is subject to a number of considerations. This includes that officers must be able to “verbalize their belief that the continued movement of the vehicle pursuit places the public in imminent danger or harm”; “[o]ther means have been considered and rejected as inappropriate or impractical, e.g. . . . tire deflation devices”; “[t]here is apparent risk, of harm or imminent danger to the public if the suspect is not immediately apprehended”; and the subject(s) “are believed to have committed either a felony level person crime(s) or a misdemeanor

²³⁴ Police Executive Research Forum, *Vehicular Pursuits: A Guide for Law Enforcement Executives on Managing the Associated Risks* 107 (2023).

²³⁵ *Id.* at 6.

²³⁶ Shaun Raviv & John Sullivan, “Deadly Force Behind the Wheel,” *Washington Post* (Aug. 24, 2020), <https://www.washingtonpost.com/graphics/2020/investigations/pit-maneuver-police-deaths/>. See, e.g., New Orleans Police Department, Policy Chapter 41.5, Vehicle Pursuits at 8 (last rev. Dec. 6, 2015), <https://nola.gov/getattachment/NOPD/NOPD-Consent-Decree/Chapter-41-5-Vehicle-Pursuits.pdf/> (“The following actions or tactics are **expressly prohibited** in a vehicle pursuit: . . . PIT maneuvers[.]” (emphasis in original).)

²³⁷ Albuquerque Police Department, Procedural Orders, Standard Operating Procedure 2-45-6 at 9 (last rev. June 14, 2023), <https://documents.cabq.gov/police/standard-operating-procedures/2-45-pursuit-by-motor-vehicle.pdf>.

²³⁸ Stanford Center for Racial Justice, *Model Use of Force Policy, Beta Release Version 1.0*, “Chapter 6: Vehicle Pursuits and Tactical Apprehensions” at 27 (Oct. 13, 2022), <https://law.stanford.edu/wp-content/uploads/2022/10/Master-Copy-Chapter-6-Vehicle-Pursuits.pdf>; see, e.g., Austin Police Department, General Order 214, “Vehicle Pursuits,” Section 214.6.3 (rev. Oct. 27, 2017), https://www.austintexas.gov/sites/default/files/images/Police/APD_Policy_Manual.pdf (“The use of the PIT should be approved in advance by the control supervisor.”); International Association of Chiefs of Police, Law Enforcement Policy Center, *Vehicular Pursuits* 6 (Dec. 2019), <https://www.theiacp.org/sites/default/files/2019-12/Vehicular%20Pursuits%20-%202019.pdf> (“Physical vehicle contact maneuvers designed to terminate a pursuit at lower speeds . . . should be undertaken only by trained law enforcement personnel.”).

²³⁹ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 7–8 (last rev. Dec. 8, 2022).

crime(s) considered a life-threatening activity to the immediate public at large.”²⁴⁰ Policy further provides that the PIT typically should not be used on motorcycles or an open-bed truck with occupants in the open-bed portion, or “when oncoming traffic may be placed in jeopardy from the use of the technique.”²⁴¹

21CP recommends that APD consider a prohibition on applying the PIT maneuver at speeds over 35 miles per hour. The Los Angeles Police Department,²⁴² Los Angeles County Sheriff’s Department,²⁴³ California Highway Patrol, Iowa State Patrol,²⁴⁴ and Milwaukee County Sheriff’s Office²⁴⁵ are examples of agencies that prohibit the use of the PIT maneuver at speeds over 35 miles per hour. For pursuits exceeding 35 miles per hour, APD policy should more specifically direct personnel to deploy spike strips or other tire deflation devices.

Municipality of Anchorage stakeholders pointed out to 21CP that other police departments do place the speed limit above which the PIT may not be used at 45 miles per hour. They noted that the Ninth Circuit recently observed, quoting national best practice literature, that “agencies commonly recommend that the maneuver be performed at slower speeds (35 to 45 mph) unless authorized for use of deadly force.”²⁴⁶ They argue that, because the PIT is effective at speeds above 25 miles per hour, precluding use to below 35 miles per hour would give officers an overly narrow band of speed during which they can perform the technique. They therefore argue for an upper limit of 45 miles per hour.

Even as it is true that some agencies place a higher limit, 21CP believes that 35 miles per hour is the appropriate upper limit for applying the PIT maneuver to set in police department policy. Because the PIT maneuver may be effectuated at speeds of less than 15 miles per hour,²⁴⁷ this provides officers an ample range of vehicle speeds within which to apply the maneuver to effectuate a safe resolution of a pursuit.

Regardless of the upper speed parameter, 21CP recommends that APD update policy to emphasize the importance of assessing the risks to the public of deploying the PIT maneuver even at speeds of less than 35 miles per hour. Although current policy does reference consideration of “the presence of bystanders” and cautions that use of the technique is not authorized “when oncoming traffic may be placed in jeopardy from the use of the technique,”²⁴⁸

²⁴⁰ *Id.* at 7.

²⁴¹ *Id.* at 8.

²⁴² Shaun Raviv and John Sullivan, “Deadly Force Behind the Wheel,” *Washington Post* (Aug. 25, 2020), available at <https://archive.investigativereportingworkshop.org/investigation/deadly-force-behind-the-wheel/>.

²⁴³ Jennifer Gollan & Susie Neilson, “Police are Deliberately Ramming Suspects’ Cars. Dozens Have Died—including Bystanders,” *San Francisco Chronicle* (Sept. 27, 2024), <https://www.sfchronicle.com/projects/2024/police-pursuits-pit/>.

²⁴⁴ Shaun Raviv and John Sullivan, “Deadly Force Behind the Wheel,” *Washington Post* (Aug. 25, 2020), available at <https://archive.investigativereportingworkshop.org/investigation/deadly-force-behind-the-wheel/>.

²⁴⁵ Bryan Polcyn, “A Dangerous, Dangerous Game: Local Police Chiefs are Split Over Aggressive Technique for Ending Pursuits,” *Fox6now.com* (Feb. 19, 2020), <https://www.fox6now.com/news/a-dangerous-dangerous-game-local-police-chiefs-are-split-over-aggressive-technique-for-ending-pursuits>.

²⁴⁶ *Sabbe v. Washington County Board of Commissioners*, 84 F.4th 807, 822 at n.12 (9th Cir. 2023) (quoting and citing Criminal Justice Testing and Evaluation Consortium, National Institute of Justice, “Vehicle Stoppage and Pursuit Management for Law Enforcement Agencies” (2022), <https://cjtec.org/files/64bfb22b75393>).

²⁴⁷ Sacramento Police Department – 2320, “Critical Decision-Making Model” at 6, <https://www.cityofsacramento.gov/content/dam/portal/police/Transparency/Education-and-Training/2026/academy-training/Critical%20Decision-Making%20Model%20%28CDM%29%20.pdf> (describing officer training in which a “[m]inimum of two pits on both sides of the vehicle will be performed at speeds between 15 and 35 MPH).

²⁴⁸ Anchorage Police Department, Policy No. 3.06.005, “Vehicle Tactics” at 7–8 (last rev. Dec. 8, 2022).

APD policy should prohibit the use of the PIT and spike strips in instances where the risk of the subject losing control of the car and injuring members of the public is high.

D. Supervision, Organization & Culture

As with other topics addressed by this report, it is important to note that 21CP did not conduct an exhaustive evaluation of APD supervision or a detailed cultural assessment of the Department. However, during its work, it did identify some recommendations relating to supervision, organization, and culture for which there appears to be a clear nexus to use of force issues. This section describes those recommendations.

At the outset, we emphasize that one of the most common topics that APD personnel raised in interviews and focus groups related not to the substance of any particular issue within the Department but to the overall *pace* of change within the Department over the past few years:

- “I am a fan of change. I am not a fan of the notion of ‘this is how we’ve always done it.’ But I think we are changing quickly without as much thought or planning as we need.”²⁴⁹
- “When it comes to change, it is moving really fast . . . Sometimes it feels like I’m working on achieving something, then the direction changes all of a sudden . . . The changes we are trying to make are good. I agree with them because they are benefitting the community and the officers and setting us up on a good foundation to move forward . . . I’ve been here when we just maintained the status quo, which is not always a good thing . . . Even though we try hard to communicate, it doesn’t always get down to rank and file. Or people hear what’s happening, but it changes three times before we figure out how to do it.”²⁵⁰
- “Policies changing three times in the last year – this is what happened with [the] less-lethal [weapons] policy – which one are we even using?”²⁵¹
- “We have so much change that is creating instability, and it’s too fast.”²⁵²
- “Every little thing is changing how officers have to operate, which can be disruptive.”²⁵³
- “I have felt we’ve been doing a poor job at rolling new stuff out. I first noticed this with body cams and dash cams . . . So many people did not go through training, so people were just hitting buttons and not knowing how to use them.”²⁵⁴
- “One . . . challenge is that we’re trying to do everything all at once as fast as we can.”²⁵⁵

21CP recognizes that many of this report’s recommendations implicate more changes for APD personnel. As the Department contemplates these and future initiatives, it will need to refocus efforts in managing those change

²⁴⁹ Focus Group with APD Stakeholders (Aug. 26, 2025).

²⁵⁰ Interview with APD Stakeholder (Sept. 3, 2025).

²⁵¹ Focus Group with APD Stakeholders (Aug. 26, 2025).

²⁵² Focus Group with APD Stakeholders (Aug. 25, 2025).

²⁵³ Interview with APD Stakeholder (Aug. 25, 2025).

²⁵⁴ Focus Group with APD Stakeholders (Aug. 26, 2025).

²⁵⁵ Focus Group with APD Stakeholders (Aug. 25, 2025).

efforts—including communicating to personnel across the Department about the nature of changes and the rationale for making them. Several of the following recommendations speak to specific mechanisms that the Department might use to ensure that personnel buy into, rather than tune out, change going forward.

Recommendation 16. APD command staff should expand their presence at roll call (“fallout”), off-hour, and field activities to deepen the relationship with personnel and build trust within APD and to improve communication about departmental changes—especially the “why” of these changes throughout the ranks of the Department.

Even as many commended the Chief for focusing on building positive relationships in the community with elected officials, community groups, and media, several APD personnel suggested that additional investment of energy on internal relationships is what may be needed to advance additional changes, new policies, or enhanced approaches.

Specifically, several APD officers indicated to 21CP that more senior leadership is not as visible as would be helpful. A supervisor told 21CP that “one of the biggest complaints is that command is not visible to the troops.”²⁵⁶ Another APD member observed:

Our Lieutenant is at roll call. Above that is rare. Only if it’s a reactionary thing, or if there is word that there is no communication, they [command staff] will come and communicate for a day – but, even then, they nitpick on something small. It would be good if sometimes leadership can just come in and say hi and say ‘good job.’²⁵⁷

Others agreed that “you can’t build trust without being consistent and persistent – consistently show up, long-term . . . You can’t have trust without being there.”²⁵⁸

Some say that the current weekly, Wednesday video from the Chief’s office and Friday Department-wide emails are seeing increasing attention. Others reported that this may not be the case:

They [command staff] are putting stuff out in email, Teams, video, and then the officer has to read it or watch it . . . But, for some people, the trust is just gone, so they don’t engage at all, even if there is a message [from the Chief or the Union].²⁵⁹

Although some said “there have been more attempts [by command staff] to communicate, the methods are just not always good.”²⁶⁰ An APD supervisor agreed that “we are communicating better than we ever had. Even though we try hard to communicate, it doesn’t always get down to rank-and-file.”²⁶¹

Going forward, 21CP recommends that APD command staff invest the time, as feasible, to engage the Department’s personnel in-person and where they are—including at roll call (“fallout”) at the start of shifts, during

²⁵⁶ Interview with APD Stakeholder (Sept. 3, 2025).

²⁵⁷ Focus Group with APD Stakeholders (Aug. 26, 2025).

²⁵⁸ *Id.*

²⁵⁹ *Id.*

²⁶⁰ *Id.*

²⁶¹ *Id.*

“off-hour” (*i.e.*, non-9-to-5) periods, and in the field. When doing so, command staff should be prepared to provide insight on the motivations and rationale for new approaches. Indeed, several interviewees and focus group participants emphasized that most members of the force want to know the “why” behind changes, new policies, or revised performance expectations.²⁶²

Recommendation 17. To ensure meaningful and comprehensive implementation of APD’s Strategic Plan – including the refinement and implementation of force-related policies, procedures, and training – APD should ensure sufficient delegation and assignment of priorities across a broader leadership group.

In interviews and focus groups with 21CP, APD personnel consistently referenced the Chief’s direct involvement in the granular aspects of making changes within the Department. This includes significant, time-consuming responsibilities such as revising and reworking APD policy directives.

It is commendable to have a leader who is not “fly-by-night” and becomes engaged in the types of substantive details that matter for efficacy and responsiveness of the Department. Indeed, in many police organizations, it is not uncommon for police chiefs to err too far toward delegating significant responsibilities to others and not be as “in the weeds” as necessary to ensure the success of particular initiatives.

However, the Chief’s detailed involvement across a number of areas runs the risk of depriving other leaders and command staff with the type of ownership that would be beneficial in driving change management. The Chief has only so many hours in each day and can only be at one place at one time. This means that he must depend on others—across the Department and in the field—to consistently reinforce and advance his vision. If other APD leaders are not closely in sync with the Chief’s approach, it is substantially less likely that today’s areas of change and strategic growth will become tomorrow’s default way of doing business.

Consequently, 21CP recommends that the Department ensure sufficient delegation and assignment of strategic initiatives and priorities across a broader APD leadership group—with the Chief guiding the organizational direction but with a larger group sharing ownership and responsibility for long-term implementation and success.

Recommendation 18. APD should periodically report – both internally and externally – on the status of recommendation implementation from the most recent APD Use of Force report, the Certus Report, and the Darcy report.

As noted previously, 21CP reviewed and considered the work, and the recommendations, of prior reports relating to APD and its use of force. In many instances, those prior reports made specific findings and recommendations that align closely with those of 21CP here.

In discussions with APD, however, the status of the Department in addressing or implementing specific recommendations from those prior studies was not always clear or precise. Indeed, there did not appear to be a comprehensive, systematic inventory of how APD had previously, or is currently, addressing prior recommendations. Some community members pointed out to 21CP that “report after report by outside experts .

²⁶² Focus Group with APD Stakeholders (Aug. 26, 2025).

. . . rehash the same issues over and over,” but “the needed funding to address” the issues does not seem to materialize.²⁶³ In light of this, some “recommended there be a timeline for any recommendations and outside . . . assistance to [help] pursue their adoption.”²⁶⁴

Going forward, 21CP recommends that APD establish and codify a streamlined approach to addressing and implementing the recommendations of the APD Use of Force report, the Certus Report, the Darcy Report, and this report, as appropriate. Within a single project management document or environment, specific recommendations should be broken out, implementation responsibilities within the organization should be identified (*i.e.*, specific personnel responsible for implementing and ensuring completion of specific recommendations), and the implementation status of each (*e.g.*, in progress, completed) should be recorded. For those areas where progress is still underway, specific milestones and deadlines should be identified. For recommendations that APD has elected not to implement, rationale or alternative courses of action might be identified.

Recommendation 19. APD should consider expanding its formalized professional development and mentorship programs.

“It is an established principle in policing that first-line supervisors – sergeants – play a critical role in directing and controlling the behavior of officers in police-citizen interactions.”²⁶⁵ In any police department, “[t]he sergeant is the person to whom the rank-and-file officer will look for direction, guidance, and assistance with problem solving,” with first-line supervisors “essentially determin[ing] the efficiency and effectiveness of the agency.”²⁶⁶ However, in many police agencies, sergeants receive relatively minimal initial training—and even less in the way of ongoing mentorship and leadership development.

This pattern of relatively minimal professional development tends to continue through a police professional’s career, with mentorship and concrete supervisor skill development opportunities difficult to access or erratically available. As some stakeholders noted to 21CP, this dynamic may be particularly acute in Anchorage, where the number of nearby, peer law enforcement agencies is much sparser than many departments in the contiguous 48 states—making professional development and skill acquisition opportunities from outside the Department more complicated to access.

Although 21CP heard some accounts of supervisors and command staff members nonetheless having enjoyed opportunities to access local and national police associations, APD should look for additional ways to incentivize lifelong learning and leadership development. One minimally costly, in-house initiative that the Department may

²⁶³ Focus Group with Community Stakeholders (Sept. 30, 2025).

²⁶⁴ *Id.*

²⁶⁵ Samuel Walker, National Institute of Justice, Police Accountability: Current Issues and Research Needs 12 (2007), <http://www.ncjrs.gov/pdffiles1/nij/grants/218583.pdf>.

²⁶⁶ Sean E. Moriarty, “The Leadership of Police Organizations Program in the Delaware State Police: Recommendations for Law Enforcement Leadership Development,” *Police Chief* (May 2009), <https://www.policiechiefmagazine.org/the-leadership-in-police-organizations-program/>.

consider is the establishment of a dynamic, formalized mentorship program oriented toward finding and cultivating today the leaders of tomorrow within the organization.²⁶⁷

Recommendation 20. APD should ensure that it maintains mechanisms – such as a formalized Early Intervention System/Program, the establishment of use of force notification protocols combined with specific supervisory expectations for trend-based, informal performance appraisals, or other protocols – to ensure that any potentially problematic performance trends are identified and addressed early through non-disciplinary mentoring, training, or other support.

As Part I of this report describes, 21CP found that a comparatively smaller number of APD officers are responsible for a comparatively larger portion of APD use of force overall. By itself, the number of use of force incidents may or may not be a problem—indeed, officers who work assignments where they regularly interact with members of the public and respond to calls for service, as compared to personnel working as, for example, a detective, may be more likely to find themselves in a situation where a subject may pose a threat or be resistant and, therefore, more likely to have been involved in a higher number of use of force incidents. At the same time, however, involvement in an elevated number of use of force incidents, especially as compared to peer officers, may set the occasion for the Department to want to ensure that no problematic performance trends are beginning.

APD currently has some defined mechanisms for the consideration of broader force trends or dynamics across incidents. For example, Internal Affairs is supposed to review “Hard Hand” where officers have 3 or more Hard Hand force applications within the preceding 12 months.²⁶⁸

Additionally, APD has maintained an Early Intervention Program—a non-disciplinary process “to support employee wellness and professional growth by seeking to identify and mitigate against factors that may lead to negative performance issues, employee discipline, and/or employee or department liability.”²⁶⁹ Consistent with early intervention or early warning programs and systems in other departments, when an officer meets a threshold of performance in a particular area (such as complaints, civil litigation, and uses of force) across a particular time period, a supervisor conducts an early intervention assessment to determine if non-disciplinary intervention (training, mentoring, counseling, etc.) may be warranted to help stop problematic performance trends from further developing.²⁷⁰ However, according to a policy last updated in 2021, the “risk factors” to be monitored, and about which supervisors are alerted when employee behavior reaches a pre-defined “threshold,” cover only a “rolling’ 30-day period”²⁷¹—which much shorter than is likely useful in determining developing performance trends. APD shared current EIS thresholds, which trigger an officer for potential follow-up

²⁶⁷ See, e.g., Leischen Stelter, Putting Experience to Work: The Value of a Formal Mentoring Program,” *Police1.com* (Apr. 27, 2017), <https://www.police1.com/police-products/training/services/articles/putting-experience-to-work-the-value-of-a-formal-mentoring-program-fUSyk7bjC2U4oZA8/>; Jeanette Loudy, et al, “The Importance of Mentorship Programs for Law Enforcement,” *Police Chief*, <https://www.policechiefmagazine.org/the-importance-of-mentorship-programs-for-law-enforcement/> (last accessed Feb. 5, 2026); U.S. Department of Justice, Office of Community Oriented Policing Services & International Association of Chiefs of Police, *Institutionalizing Mentoring Into Police Departments* (2003), <https://www.theiacp.org/sites/default/files/2018-08/BP-Mentoring.pdf>.

²⁶⁸ Anchorage Police Department, Operational Procedure 3.05.025, “Response to Resistance” at § II (last rev. Aug. 14, 2024).

²⁶⁹ Anchorage Police Department, Administrative Procedure 2.09.025, “Early Intervention Program” at 1 (last rev. Mar. 16, 2021).

²⁷⁰ *Id.*

²⁷¹ *Id.* at 3.

intervention when they have been the subject of 3 complaints, 2 force investigations, 1 lawsuit, 2 Records RFA, 2 unexcused tardiness events, 2 uses of force, or 2 vehicle accidents in a one-month period. There is also an overall, aggregate threshold of being involved in five incidents of any time in a rolling 4-month period.

Many departments have indeed looked to address this through the operation of Early Intervention or Early Warning Systems, along the lines of what APD policy has previously sought to establish. It was noteworthy that, in discussions with Department personnel and supervisors, 21CP heard nothing about APD's Early Intervention Program—suggesting that the Program is not the type of robust, dynamic process by which supervisors can gain a broader understand of officer performance overall and can guide individuals under their command toward mentorship, training, and other resources to prevent problems from arising in the future.

Whether it is through a re-invigorated, more meaningful Early Intervention Program or through other formal processes, APD can benefit from greater focus on ensuring that supervisors consider an officer's overall pattern or trends when it comes to performance – not just isolated incidents – and are equipped with the tools to provide mentoring, training, or other support to officers who might benefit from it. To this end, 21CP recommends that the Department more comprehensively and systematically develop a system or protocol that ensures that supervisors are aware of each officer under their command's underlying use of force dynamics and trends—and that they are charged with identifying and addressing any potentially problematic performance trends before they become acute issues. Supervisors should receive additional training on monitoring, mentoring, and evaluating officers identified via this early detection mechanism.

E. Community Engagement & Relationship-Building

Recommendation 21. The Department should work to develop more structured, ongoing opportunities for rank-and-file APD officers to engage informally with the broader Anchorage community.

21CP's scope of work related to APD's use of force – and analyzing both dynamics surrounding use of force over the past several years and the Department's force policies, procedures, and protocols. Consequently, many important, nuanced contours relating to its relationship and engagement with the community are beyond the scope of the present work.

Nevertheless, community members and APD officers who spoke with 21CP appeared to agree that more structured opportunities for APD personnel to engage with community members – such as roundtables, foot patrols in Anchorage's downtown, formal youth programs, and others – would be useful in building relationships with Anchorage's diverse communities. 21CP recommends that APD explore such opportunities as a way of the APD community and officers alike learning from the other and cultivating a broader appreciation of the challenges and dynamics that the other faces. This is likely to have long-term benefits when it comes to use of force and community trust of APD with respect to the application of force.

Conclusion & Metrics for Gauging Future Progress

The purpose of this report is to (1) identify the attributes, features, and circumstances that lead to or are more frequently associated with the Anchorage Police Department's use of force, including incident features and officer practices, and (2) evaluate APD's policies, training, and practices relating to use of force in order to provide pragmatic recommendations to the Municipality of Anchorage and the Anchorage Department for improvements and enhancements.

As noted at the outset of the report, and as detailed in Table 1, the implementation of many of these recommendations will require time, effort, and diligence. In particular, changes to policies and protocols relating to force require both finalizing changes on paper and implementing those changes in practice through officer training. None of the recommendations can be accomplished overnight. Similarly, there may be barriers or impediments to immediate, or even full, implementation to some of these recommendations – such as collective bargaining agreement provisions, resource limitations, technological shortcomings, staffing dynamics, or other operational considerations.

As APD considers the recommendations contained in this report, and potentially implements these and other changes that relate to the use of force, one question from community members and Anchorage stakeholders that surfaced regularly was how APD might measure success when it comes to use of force. How will APD, and the Anchorage community, know whether things are changing and heading in a positive direction?

No single measure or metric – or set of measures or metrics – alone establishes whether a police department's use of force practices are good, bad, or heading in a positive or negative direction. Instead, in 21CP's experience, the following collection of metrics may together be helpful for Municipality, APD, and community stakeholders to consider when gauging whether the implementation of the recommendations included in this report may be working:

- ***The frequency and nature of force used.***
 - *Use of force incidents per number of calls for service and per number of arrests.* Lower or declining rates may suggest enhanced use of de-escalation and critical decision-making approaches.
 - *Use of force incidents by force Level.* Declining uses of higher use of force levels may also suggest an expanded use by officers of less-lethal options rather than using more significant and lethal force.
 - *The proportion of incidents resolved without the deployment of force.* Increasing numbers of incidents that do not involve force suggest that officers are deploying force only when reasonable, necessary, and proportional – and consistent with the duty to de-escalate.
- ***De-escalation.***
 - *The number of incidents where de-escalation techniques, where feasible, are deployed and documented.* Positive trends in the use of de-escalation techniques may suggest that policy, training, and supervision changes are being translated from paper into practice.
- ***Subject and officer injuries.***

- *Subject injuries.* Fewer injuries, and/or fewer serious injuries, to the subject of use of force incidents often is consistent with the deployment de-escalation strategies and using force techniques in a method consistent with training.
 - *Officer injuries.* Declining officer injury rates may suggest that approaches to use of force are enhancing, or at least not compromising, officer safety.
- ***Crime rates.*** Analysis of criminal offense data can help to establish whether changes in use of force approaches are related to any undue hesitation among officers to engage in proactive policing, initiate enforcement activity where authorized, and use force if necessary.
- ***Subject and geographic characteristics.*** Declining disparities with respect to whom force is applied (e.g., race, ethnicity) and where such force occurs (e.g., neighborhoods, APD beats) may signal meaningful adoption of sound force approaches.
- ***Complaints about excessive force.***
 - *Overall number of complaints.* Presuming no changes in reporting criteria, intake processes, or acceptance protocols, a decline in civilian complaints about excessive force may correspond to meaningful changes in force practices.
 - *Overall number of sustained complaints.* Declining numbers of *sustained* complaints may also signal meaningful adoption of sound force approaches.
- ***Litigation and settlement costs.*** Lower payments in settlements and verdicts associated with APD use of force is likely a positive metric.
- ***Community and APD officer surveys.*** Higher levels of community confidence and trust in the police, and lower reported concerns about force, can signal that new approaches are translating to the real world and to the direct experiences of community members. Likewise, specific surveys of APD officers can help to gauge the impact and sentiment of officers with respect to new force approaches – with higher numbers of officers reporting that they understand expectations and feel safe while doing their job serving as likely positive metrics.

Appendix

ANCHORAGE POLICE DEPARTMENT

21CP Recommendations — Updated Gap Analysis

August 2026



APD PHILOSOPHY

"Every person, officer and community member alike, must go home safely. It is our belief that everybody matters."

This statement is codified in Policy 3.01 and reflects APD's adaptation of 21CP's sanctity of human life recommendation into the Department's own voice and values.

STATUS KEY

✓ INCLUDED IN POLICY	The recommendation is substantively addressed in the current policy or through documented operational action.
~ PARTIALLY ADDRESSED	The policy or operational action moves in the right direction but a gap or refinement remains.
✗ NOT YET INCLUDED	Not yet reflected in policy or documented operational practice.
⚙ OPERATIONAL — NO POLICY NEEDED	Addressed through operational/administrative action; no policy change is required or expected.

SOURCE KEY

The badges below appear in the Source line of each recommendation block to show where that recommendation is addressed.

3.01 Use of Force	3.02 Reporting/Inv.	3.03 Force Rev. Bd.	3.04 OIS/Deaths	3.05 Veh. Pursuits	3.10 Chem. Agents	1.10 Duty to Int.	Impl. Impl. Report	Admin Operational
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PART A — USE OF FORCE: POLICY

A1 — Training Recommendations (Recs 1.1-1.14)

Recommendation 1.1: Streamline and focus the core use of force policy.

✓ INCLUDED IN POLICY	Source: 3.01
Policy / Source	Policy 3.01 — Use of Force (comprehensive restructure of PI 3.05.025)
Analysis	Policy 3.01 is a comprehensive restructuring of the former Response to Resistance policy. All sections are clearly delineated and redundancy has been eliminated.

Recommendation 1.2: Comprehensive statement of purpose affirming the sanctity of human life (adapted to APD's philosophy).

✓ INCLUDED IN POLICY

Source:

3.01

Policy / Source

Policy 3.01 — Policy section; draft annotations cite 21CP 1.2

Analysis

Policy 3.01 opens with: 'The Anchorage Police Department is committed to the principle that every person — officer and community member alike — must go home safely. It is our belief that everybody matters.' This directly fulfills the recommendation in APD's own voice, which 21CP affirmed is an acceptable alternative to the term 'sanctity of human life.'

Recommendation 1.3: Affirmatively require de-escalation ('shall') whenever safe and feasible.

✓ INCLUDED IN POLICY

Source:

3.01

Policy / Source

Policy 3.01 — De-escalation and Mitigation section; cites 21CP 1.3

Analysis

Policy 3.01 mandates: 'Officers shall use de-escalation and mitigation techniques, strategies, and tactics whenever safe and feasible.' Nine specific techniques are listed. Upgraded from prior 'should' language.

Recommendation 1.4: Streamline and strengthen verbal warning requirements.

✓ INCLUDED IN POLICY

Source:

3.01

Policy / Source

Policy 3.01 — Verbal Warning section; cites 21CP 1.4

Analysis

Consolidated into a single clear provision covering identification, commands, warning of force, and opportunity to comply. Prior redundant language eliminated.

Recommendation 1.5: Expressly require 'proportional' force based on totality of circumstances.

✓ INCLUDED IN POLICY

Source:

3.01

Policy / Source

Policy 3.01 — Policy section; cites 21CP 1.5

Analysis

Policy 3.01 requires force 'in direct relationship to the nature of the threat or resistance presented by the subject under the totality of the circumstances' and requires consideration of less intrusive alternatives. Proportionality is fully operationalized; cites 21CP 1.5 in annotations.

Recommendation 1.6: Provide sufficient detail on the objective reasonableness inquiry.

✓ INCLUDED IN POLICY	Source:	3.01	
Policy / Source	Policy 3.01 — Use of Force Standards; cites <i>Graham v. Connor</i> and <i>Barnes v. Felix</i> ; cites 21CP 1.6		
Analysis	Twelve specific factors enumerated. <i>Graham v. Connor</i> and <i>Barnes v. Felix</i> both cited in the policy. This exceeds the prior policy's vague reasonableness language.		

Recommendation 1.7: Specifically define types of subject resistance.

✓ INCLUDED IN POLICY	Source:	3.01	3.02	
Policy / Source	Policy 3.01 Definitions; Policy 3.02 Definitions; cites 21CP 1.7			
Analysis	Detailed definitions for Active Resistance (with the critical bracing/tensing clarifier), Passive Resistance, Non-Compliant Handcuffing, Compliant Handcuffing, Soft/Hard Empty Hand Control. Both 3.01 and 3.02 carry these definitions.			

Recommendation 1.8: Require officers to exhaust all other reasonable means before using deadly force.

✓ INCLUDED IN POLICY	Source:	3.01		
Policy / Source	Policy 3.01 — Policy section and Use of Force Standards; cites 21CP 1.8			
Analysis	Policy 3.01 requires consideration of 'whether there is another, less intrusive option available that will safely and effectively achieve the same objective' and evaluates pre-force actions as part of the totality. Annotated as 21CP 1.8.			

Recommendation 1.9: Clarify 'imminent threat' — proximity to weapon alone is insufficient.

✓ INCLUDED IN POLICY	Source:	3.01	3.02	3.10	
Policy / Source	Policy 3.01 Definitions; Policy 3.02 Definitions; Policy 3.10; all cite 21CP 1.9				
Analysis	All three policies now include the AOJ definition AND the critical clarifier: 'Possible proximity to a weapon or a potential future risk does not, by itself, constitute an imminent threat.' Consistent across the 3-series.				

Recommendation 1.10: Prohibit force against 1st Amendment activity, retaliatory force; clarify chokeholds and force against restrained persons.

✓ INCLUDED IN POLICY

Source:

3.01

Policy / Source

Policy 3.01 — Non-deadly Force Restrictions; cites 21CP 1.10

Analysis

All four elements: (a) 1st Amendment prohibition; (b) Retaliatory force prohibited; (c) Neck restraint/hold = deadly force, permitted only when deadly force authorized; (d) Force against handcuffed persons restricted to imminent harm, escape prevention, or passive resistance removal.

Recommendation 1.11: Require officers to carry less-lethal instruments while on duty.

✓ INCLUDED IN POLICY

Source:

3.10

Policy / Source

Policy 3.10 — Chemical Agents: all uniformed patrol shall carry OC once trained; ECW may substitute

Analysis

Policy 3.10 mandates all uniformed patrol officers carry at least one less-lethal instrument. The requirement is operationalized through weapon-specific policies.

Recommendation 1.12: Affirmative duty to intervene in unlawful/excessive force by other officers.

✓ INCLUDED IN POLICY

Source:

1.10

Policy / Source

Policy 1.10 — Duty to Intervene (effective 11/28/2025)

Analysis

Policy 1.10 is comprehensive: affirmative intervention duty regardless of rank; four-stage intervention framework (Prevention, Dissuade, Disengage, Impede); duty to aid; mandatory reporting; anti-retaliation protection; discipline up to dismissal for failure to intervene.

Recommendation 1.13a: Caution officers against OC spray in windy conditions or near ignition sources.

✓ INCLUDED IN POLICY

Source:

3.10

Implement

Policy / Source

Policy 3.10 — Use of Force Standard (bystander consideration); 21CP Implementation Report

Analysis

Policy 3.10 requires officers to 'consider their surroundings and the surroundings of the suspect to reduce the risk of exposure to uninvolved bystanders.' The 21CP Implementation Report confirms: 'The policy does not specifically address windy conditions but the policy does require officers to ensure no unintended targets are impacted by the OC, which meets this requirement.' This is now documented as meeting the recommendation.

Recommendation 1.13b: Prohibit OC spray on handcuffed/restrained persons absent immediate threat.		
✓ INCLUDED IN POLICY	Source:	3.10
Policy / Source	Policy 3.10 — Restrictions on Use; cites 21CP 1.13b	
Analysis	Policy 3.10 explicitly prohibits OC on handcuffed persons 'unless there is a clear threat of immediate physical injury to the officer or others.' This directly implements the recommendation.	

Recommendation 1.13c: Scenario-based, decision-making-focused less-lethal training.		
✓ INCLUDED IN POLICY	Source:	3.01
Policy / Source	Policy 3.01 — Training section; cites 21CP 2	
Analysis	Policy 3.01 mandates 'dynamic, integrated, and scenario-based' training 'emphasizing critical decision-making skills in realistic situations.' Encompasses less-lethal instruments within the broader training requirement.	

Recommendation 1.14: Finalize Policy 3.08 — Use of Canines.		
✓ INCLUDED IN POLICY	Source:	3.01
Policy / Source	Policy 3.08 — Use of Canines (3-series policy finalized)	
Analysis	Policy 3.08 is finalized in the 3-series framework. Canine Unit Procedural Manual also maintained.	

A2 — Training Recommendations (Recs 2–5)

Recommendation 2: Dynamic, integrated, scenario-based use of force training.		
✓ INCLUDED IN POLICY	Source:	3.01
Policy / Source	Policy 3.01 — Training and Qualifications; cites 21CP 2	
Analysis	Policy 3.01 mandates 'dynamic, integrated, and scenario-based' training in 'realistic situations consistent with the community and operational environment in Anchorage.' Annual in-service requirement with documentation.	

Recommendation 3: Training required whenever substantive policy changes are made.

✓ INCLUDED IN POLICY	Source:	3.01
Policy / Source	Policy 3.01 — Training section; cites 21CP 3	
Analysis	Policy 3.01: 'Whenever substantive changes are made to use of force policies, the Department shall provide training to all sworn personnel on the new performance expectations prior to or concurrent with implementation.'	

Recommendation 4: Annual training: de-escalation, peer intervention, team tactics, high-risk stops.

✓ INCLUDED IN POLICY	Source:	3.01
Policy / Source	Policy 3.01 — Training section; cites 21CP 4	
Analysis	Policy 3.01: 'Annual training shall consist of team tactics, including peer intervention when necessary.' De-escalation is embedded in the scenario-based requirement. Policy 1.10 reinforces peer intervention through the duty-to-intervene framework.	

Recommendation 5: Training on cross-cultural communication, LEP, and procedural justice.

✓ INCLUDED IN POLICY	Source:	Implement
Policy / Source	21CP Recommendation Implementation Report (2026)	
Analysis	The Implementation Report documents: (1) All officers completed Alaska Native Cultural Awareness and MMIP training in 2026 — required by state law every two years; (2) All officers received procedural justice training in 2025 and 2026, recurring every other year; (3) Policy 5.22 addresses LEP interactions and disability accommodations; (4) APD is piloting Axon translation tools for field officers; (5) APD Dispatch upgrading to AI translation service; (6) All academies include an emotional intelligence class incorporating cross-cultural communication. This recommendation is now substantively addressed through documented operational action and policy.	
Remaining Action / Note	Codifying the training requirement in a training policy would formalize the commitment and ensure continuity across leadership changes.	

PART B — REPORTING, INVESTIGATION, REVIEW & ADJUDICATION (RECS 6–13)

Recommendation 6: Comprehensive aggregate use of force data collection and analysis.

✓ INCLUDED IN POLICY	Source:	3.02
Policy / Source	Policy 3.02 — Annual Report Analysis; cites 21CP 6	
Analysis	Policy 3.02 mandates an Annual Report Analysis covering: date/time trends, encounter types, race/age/gender trends, injury trends, and impact on policies/practices/equipment/training. Required report to Chief and all supervisors by February 1 annually.	

Recommendation 7: Revise and clarify force Level definitions.

✓ INCLUDED IN POLICY	Source:	3.02
Policy / Source	Policy 3.02 — Force Reporting Levels; cites 21CP 7	
Analysis	Detailed Level 1, 2, and 3 categories with specific force types enumerated under each. Substantially more specific than prior policy.	

Recommendation 8: OIS administrative leave longer than the former four-day period.

✓ INCLUDED IN POLICY	Source:	3.04
Policy / Source	Policy 3.04 — Treatment of Officer section; cites 21CP 8; also reflected in Policy 3.02	
Analysis	Policy 3.04 mandates 'a minimum of seven consecutive calendar days' administrative leave following any OIS resulting in death or serious physical injury, tied expressly to 'officer wellness needs and investigative integrity.' Exceeds the prior four-day practice.	

Recommendation 9.1: Substantive supervisory (L1) and senior command (L2) review.

✓ INCLUDED IN POLICY	Source:	3.02
Policy / Source	Policy 3.02 — Level 1 and Level 2 sections; cites 21CP 9.1	
Analysis	Level 1: shift supervisor review with de-escalation, continuous assessment, and documentation assessment; Lieutenant review. Level 2: supervisor responds to scene, conducts preliminary investigation, 7-day completion, Division Commander reviews within 30 days. Multi-tier substantive review codified.	

Recommendation 9.2: Video/audio recording of OIS investigative interviews; transcription for L3.

✓ INCLUDED IN POLICY	Source:	3.04
Policy / Source	Policy 3.04 — <i>Administrative Investigation</i> ; cites 21CP 9.2	
Analysis	Policy 3.04: 'All interviews shall be audio and video recorded in order to provide evidentiary record of statements.' Applied to all administrative investigation phase interviews.	
Remaining Action / Note	Confirm whether the recording requirement is explicitly extended to Level 2 supervisory investigations under Policy 3.02, as 21CP's recommendation specifically covered both L2 and L3.	

Recommendation 9.3: Supervisor (not peer officer) escort for involved officers during IA investigation.

~ PARTIALLY ADDRESSED	Source:	3.04
Policy / Source	Policy 3.04 — <i>Initial Supervisor Response section</i> ; cites 21CP 9.3	
Analysis	Policy 3.04 states a supervisor 'if possible' shall escort involved officers, not other involved officers. The 'if possible' qualifier and fallback to a 'companion officer' leave the door open for peer escort in some circumstances. 21CP specifically recommended that a supervisor — not peers — escort involved officers to preserve the integrity of initial accounts.	
Remaining Action / Note	Strengthen to: 'A supervisor shall escort each involved officer. If a supervisor is unavailable, the next ranking uninvolved officer shall perform this function. Officers involved in the same incident shall not escort one another.'	

Recommendation 9.4: Document BWC deactivation in officer and supervisor reports.

✓ INCLUDED IN POLICY	Source:	3.02
Policy / Source	Policy 3.02 — <i>Officer and Supervisor documentation requirements</i> ; cites 21CP 9.4	
Analysis	Two separate provisions: officers must document BWC deactivation for any Level 1+ incident; supervisors must independently document the same. Both provisions cited as 21CP 9.4 in annotations.	

Recommendation 9.5: Investigators find facts only; chain of command adjudicates.

✓ INCLUDED IN POLICY	Source:	3.02
Policy / Source	Policy 3.02 — <i>Investigative Findings and Commander Responsibilities</i> ; cites 21CP 9.5 and 11.5	
Analysis	Policy 3.02 uses three revised adjudication categories (Within Policy; Not Within Policy — Training Opportunity; Not Within Policy) focused on policy compliance rather than legal justification. Commander Responsibilities section establishes chain-of-command adjudication authority.	

Recommendation 10: Add at least one more IA investigator.		
 OPERATIONAL — NO POLICY NEEDED	Source:	Admin
Policy / Source	<i>Administrative/staffing decision — not addressable by policy text</i>	
Analysis	This is a resource and personnel decision that cannot be resolved through policy language. Policy 3.02's 7-day and 30-day investigation timelines create implicit accountability pressure for adequate staffing.	

Recommendation 11.1: FRB required to review all Level 2 and Level 3 incidents.		
✓ INCLUDED IN POLICY	Source:	3.03
Policy / Source	<i>Policy 3.03 — Use of Force Review Boards: FRB scope, Level 2 sampling, and Level 3 mandatory review</i>	
Analysis	Policy 3.03 now expressly governs FRB review scope. All Level 3 incidents are subject to mandatory FRB (and UDFRB) review. For Level 2, the policy codifies a 50% random sample with mandatory exceptions for: officers with 2+ prior FRBs in 12 months; incidents involving a policy violation; and incidents where an injury occurred. The Chief retains override authority to direct review of any Level 2 incident. This directly addresses the prior gap of no clear FRB mandate.	

Recommendation 11.2: Clarify FRB scope excludes non-force vehicle collisions.		
✓ INCLUDED IN POLICY	Source:	3.03
Policy / Source	<i>Policy 3.03 — FRB scope section (revised)</i>	
Analysis	Policy 3.03 now states the exclusion expressly. The FRB jurisdiction list reads: “Any vehicle tactic resulting in injury requiring medical treatment (beyond first aid) or vehicle damage (beyond minor scuffs or paint transfer). Vehicle collisions that do not meet the definition of a use of force under policy 3.01 are not subject to FRB review under this policy.” The added sentence does three things the recommendation asked for: it names the exclusion rather than leaving it to inference; it anchors the test to the use-of-force definition in Policy 3.01 rather than to a damage threshold; and it limits the exclusion to FRB review under this policy, so a collision routed away from the Board still proceeds through the Department’s separate collision review process rather than escaping review. The retained damage threshold continues to serve a distinct purpose. It keeps deliberate tactical contact — a pin or block leaving real damage — inside FRB jurisdiction even where no one is injured, preserving the Board’s visibility into vehicle tactics as force. A pin is a tactic, not a collision, so the exclusion does not reach it.	

Recommendation 11.3: FRB mandate expanded to include systemic training/equipment/policy review.			
✓ INCLUDED IN POLICY	Source:	3.03	
Policy / Source	Policy 3.03 — Analytical Framework and Annual Review sections		
Analysis	Policy 3.03's FRB Analytical Framework requires evaluation of: de-escalation and pre-force actions; alternative tactics; supervision/management/leadership issues; adequacy of the investigation; equipment functionality; and notable performance. The Annual Review section requires identifying 'trends in FRB findings, recurrent training deficiencies, and the status of outstanding Action Items.' The Action Item template further formalizes systemic remediation. This fully implements the 360-degree review mandate.		

Recommendation 11.4: Supervisor recusal from force reviews where impartiality is compromised.			
✓ INCLUDED IN POLICY	Source:	3.02	3.03
Policy / Source	Policy 3.02 — Supervisor Responsibilities; Policy 3.03 — Voting Procedures / Conflict of Interest		
Analysis	Policy 3.02 explicitly prohibits supervisors who used force, authorized force, or 'are unable to remain impartial' from conducting the investigation. Policy 3.03 adds a formal conflict-of-interest and mandatory recusal provision covering both direct involvement and familial/personal relationships that could create an appearance of bias. Both policies now address this.		

Recommendation 11.5: Revise adjudication categories to focus on policy compliance.			
✓ INCLUDED IN POLICY	Source:	3.02	
Policy / Source	Policy 3.02 — Investigative Findings; cites 21CP 11.5		
Analysis	Three revised categories: (1) Within Department Policy; (2) Not Within Policy — Training Opportunity; (3) Not Within Department Policy. Replaces the prior confusing four-category framework that conflated legal justification with policy compliance. Policy 3.03's Action Item framework operates in tandem.		

Recommendation 11.6: Mandatory tactical debrief after all OIS adjudications.			
✓ INCLUDED IN POLICY	Source:	3.04	3.03
Policy / Source	Policy 3.04 — Tactical Debrief section; Policy 3.03 — Use of Deadly Force Review		
Analysis	Policy 3.04 contains a dedicated Tactical Debrief section with required attendees (Training Commander, Training Sergeant, unit commander, Division Captain, Chief or Deputy Chief). Debrief is mandatory regardless of findings. Policy 3.03's UDFRB framework includes a structured tactical debrief as a component of the deadly force review.		

Recommendation 12: Communicate OIS adjudication outcomes internally and externally.				
~ PARTIALLY ADDRESSED	Source:	3.04	Impl.	
Policy / Source	Policy 3.04 (transparency emphasis); 21CP Implementation Report			
Analysis	Policy 3.04 emphasizes thorough, impartial investigation 'to promote public trust.' The Implementation Report states APD 'is creating a use of deadly force outside committee to review these uses of force' and acknowledges that investigations and findings are protected by personnel laws. APD's response — a community working group — is the identified best available mechanism given legal constraints. A specific policy provision requiring communication of final adjudication outcomes (rather than investigation details) is not yet codified.			
Remaining Action / Note	This may be addressed through the annual AI reporting data and creating an outside committee to review a sample of cases.			

Recommendation 13: Post-event support protocols for families following OIS.				
✓ INCLUDED IN POLICY	Source:	3.04		
Policy / Source	Policy 3.04 — Treatment of Officer and family support sections; cites 21CP 13			
Analysis	Policy 3.04 designates a point of contact for involved officers and their families, provides for peer support, chaplain/mental health professional contact, and timely investigation updates.			
Remaining Action / Note	Consider expanding the point-of-contact provision to also cover families of subjects involved in OIS events — not only officer families — consistent with APD's belief that everybody matters.			

PART C — VEHICLE TACTICS & PURSUITS (RECS 14–15)

Recommendation 14: Revise Vehicle Tactics and Pursuits policies — clarity on initiation, continuation, termination.

✓ INCLUDED IN POLICY	Source:	3.05
Policy / Source	Policy 3.05 — Vehicle Pursuits and Tactics (consolidated from PI 3.06.005 and PI 3.06.015)	
Analysis	Policy 3.05 consolidates both former policies into a single framework with imminent threat initiation standard, continuous risk assessment mandate, supervisor responsibilities, termination criteria, and dispatch protocols.	

Recommendation 14.1: Define 'imminent' threat in vehicle tactics context more clearly.

✓ INCLUDED IN POLICY	Source:	3.05
Policy / Source	Policy 3.05 — Definitions (revised); cites 21CP 14.1	
Analysis	Policy 3.05 now carries a full Imminent Threat definition in its own Definitions section: an imminent threat exists when, on the totality of the circumstances, an officer believes a person has the ability and opportunity, and there is jeopardy (AOJ), of causing death or serious bodily injury and the danger is immediate — meaning it is about to occur. Ability, Opportunity and Jeopardy are each separately defined. The clarifier flagged in the July 2026 analysis has been added: “Possible proximity to a weapon or a potential future risk does not, by itself, constitute an imminent threat.” This sentence does the heaviest lifting, foreclosing the two most common ways an imminence finding gets stretched. The definition is carried verbatim in Policy 3.01, so the standard applied to a vehicle tactic is the standard applied to every other force decision, and the FRB is not applying two different imminence tests. Within 3.05 the definition is load-bearing: it is the operative test for authorizing a pin, and it governs the pursuit initiation standard, reinforced by the explicit note that suspected OUI alone does not meet the threshold and that the driver’s actions must be creating the threat.	

Recommendation 14.2: Expand 'public risk' to include the risk posed by the pursuit itself.

✓ INCLUDED IN POLICY	Source:	3.05
Policy / Source	Policy 3.05 — Definitions; cites 21CP 14.2	
Analysis	Policy 3.05 defines Public Risk to expressly include 'the risks involved with initiating or continuing a pursuit' in addition to the suspect's conduct and escape risk. Officers must weigh all three factors.	

Recommendation 14.3: Clear, consistent guidance on roadblocks — prohibit or strictly circumscribe.

✓ INCLUDED IN POLICY	Source:	3.05
Policy / Source	Policy 3.05 — Roadblocks section; cites 21CP 14.3	
Analysis	'Roadblocks are prohibited during a vehicle pursuit to stop violators.' Prior ambiguity resolved by outright prohibition.	

Recommendation 14.4: Officers must continuously reassess risk throughout an in-progress pursuit.

✓ INCLUDED IN POLICY	Source:	3.05
Policy / Source	Policy 3.05 — Initiation of a Pursuit, § IV.B.1.e–f; Termination section; Policy 3.03 — pursuit review criteria	
Analysis	Policy 3.05 § IV.B.1 states this duty in two linked subsections. Subsection (e) limits the justification for starting a pursuit to driving behavior observed before the pursuit began, which prevents an officer from using conduct the pursuit itself provoked to build a justification that did not exist at the outset. Subsection (f) then requires officers and supervisors to constantly evaluate the risks of initiating or continuing a pursuit and to assess whether those risks outweigh the possible benefits of continuing, measured against eighteen enumerated factors	

Recommendation 15.1: No blocking/rolling-box when occupants known to be armed with a firearm.

✓ INCLUDED IN POLICY	Source:	3.05
Policy / Source	Policy 3.05 — Rolling-Box and Blocking sections; cites 21CP 15.1	
Analysis	Both rolling-box and blocking are explicitly prohibited 'where it is known to officers that the vehicle occupants are armed with a firearm.' SWAT/ISU exception for violent offender apprehension.	

Recommendation 15.2: Limit pinning to stopped/slow-moving vehicles; trained units for armed suspects.

✓ INCLUDED IN POLICY	Source: 3.05
Policy / Source	Policy 3.05 — Pinning section (Authorization / Restrictions); cites 21CP 15.2
Analysis	The recommendation has two parts. APD adopts the second in full and departs from the first on a reasoned basis. Part (b) — speed definition: adopted. 21CP objected that ‘slow speed’ appeared in policy undefined, leaving no boundary between a pin and a de facto ramming. Policy 3.05 now fixes the number: “Use of a vehicle pin is restricted to stopped or slow-moving vehicles. Slow-moving, is generally considered to be less than 10 mph.” At that speed the energy involved is far below the ramming threshold, and the definitions section reinforces the boundary by providing that a pinning maneuver should not create a substantial risk of extensive property damage, death or serious physical injury. Part (a) — specialized units only: departure. APD authorizes trained patrol officers to pin at the 10 MPH restriction where there is no known weapon; no specialty vehicle or ballistic-equipped platform is required. The armed-subject carve-out 21CP sought is nonetheless in policy: “Pinning is not permitted where it is known to officers that the vehicle occupants are armed with a firearm. SWAT/ISU may engage in high-risk pinning while attempting to apprehend violent offenders.” The result is a two-tier authorization — ordinary pinning by patrol, high-risk pinning reserved to SWAT/ISU.

Recommendation 15.3: Ramming — prohibit or limit to deadly force situations with supervisor approval.

✓ INCLUDED IN POLICY	Source: 3.05
Policy / Source	Policy 3.05 — Ramming section
Analysis	'Ramming is prohibited unless specifically authorized by a supervisor after consideration of the necessity of applying deadly physical force as defined by AS 11.81.335.' Requires supervisor authorization and deadly force justification.

Recommendation 15.4: PIT: ≤45 mph cap; prohibit in high-density/public-risk areas.

✓ INCLUDED IN POLICY

Source:

3.05

Policy / Source*Policy 3.05 — PIT Maneuver section; Policy 3.02 — Force Reporting Levels (Level 3); Policy 3.03 — FRB jurisdiction; cites 21CP 15.4***Analysis**

Part (b) — high-risk locations — is adopted in full. Policy 3.05 prohibits the PIT where oncoming traffic may be placed in jeopardy and where the risk of the subject losing control and injuring the public is high, and requires officers to weigh bystanders, weather, lighting, road and traffic conditions, sight lines and other hazards before initiating. Parallel restrictions govern tire deflation device placement.

Part (a) — the speed ceiling — is set at 45 mph rather than 35, a deliberate Department judgment supported by a mandatory review chain. Policy 3.05 prohibits a PIT above 45 mph; Policy 3.02 lists a PIT over 45 mph among the enumerated Level 3 uses of force; and Policy 3.03 places every Level 3 use of force within Force Review Board jurisdiction, with no sampling and no discretion. An above-ceiling PIT therefore cannot be reported, adjudicated and closed without Board scrutiny, and the Board's pursuit-review criteria require it to examine whether vehicle tactics stayed within policy speed and context limits. Policy 3.05 also preserves 21CP's exhaustion requirement: other means, expressly including tire deflation devices, must be considered and rejected before a PIT is authorized.

PART D — SUPERVISION, ORGANIZATION & CULTURE (RECS 16–21)

Recommendation 16: Command staff field presence — roll call, off-hours, working environments.

✓ INCLUDED IN POLICY	Source:	Impl.
Policy / Source	21CP Recommendation Implementation Report (2026)	
Analysis	The Implementation Report documents: 'All command staff members are required, beginning in 2026, to attend meetings, training, and working environments of their units and other units to reinforce the department vision, mission, values, and build relationships.' In May 2026, all captains were deployed to the field for the entire month, attending only two meetings per week. This is a documented, systematic operational response.	

Recommendation 17: Delegate strategic initiatives across a broader leadership group.

✓ INCLUDED IN POLICY	Source:	Impl.
Policy / Source	21CP Recommendation Implementation Report (2026)	
Analysis	The Implementation Report documents: 'The policy project has been turned over to a sergeant for drafting and reviewing, which includes all personnel during the review process.' Training Division develops and implements policy-driven training. Unit goals, objectives, and measurements of success are determined by the units themselves. Ownership of strategic initiatives is being distributed across the organization.	

Recommendation 18: Periodic public reporting on recommendation implementation status.

✓ INCLUDED IN POLICY	Source:	Impl.
Policy / Source	21CP Recommendation Implementation Report (2026)	
Analysis	The Implementation Report documents: 'All recommendations made to APD have been publicly reported once in 2025, once already in 2026, and will be reported one additional time in 2026. Reports will continue until all recommendations have been addressed.' This is a systematic, recurring public accountability mechanism.	

Recommendation 19: Formalized professional development and mentorship programs.

✓ INCLUDED IN POLICY	Source:	Impl.
Policy / Source	Policy 9.07 — Career Development; 21CP Recommendation Implementation Report	
Analysis	The Implementation Report references Policy 9.07 (Career Development) as addressing structured mentorship, ongoing training, and alignment of the department's vision, values, and mission. This policy provides the formal framework for long-term culture development and leadership continuity.	

Recommendation 20: Robust Early Intervention System to identify problematic performance trends.

✓ INCLUDED IN POLICY	Source:	Impl.
Policy / Source	21CP Recommendation Implementation Report (2026)	
Analysis	The Implementation Report documents significant enhancements: (1) APD developed a peer support and wellness policy; (2) A phone app provides access to all available wellness resources; (3) A formal referral process has been created; (4) An in-house clinician has been hired for employees and their families; (5) A long-term behavioral health check-in program for personnel involved in critical or high-risk incidents is under development. These collectively constitute a substantially enhanced early intervention and wellness system.	
Remaining Action / Note	The behavioral health check-in program for critical incident personnel is still being developed in cooperation with the APDEA.	

Recommendation 21: Structured community engagement program for officers.

✓ INCLUDED IN POLICY	Source:	Impl.
Policy / Source	21CP Recommendation Implementation Report (2026)	
Analysis	The Implementation Report documents multiple formal and informal community engagement efforts: youth development program; APD-affiliated non-profit (AC4C) for community outreach and charitable giving; youth basketball league with APD coaches; active social media engagement with community feedback; a podcast featuring employees and community members; expanded formal recruitment and community event participation; a dedicated MMIP Coordinator position for the Alaska Native community; a developing Pacific Islander community liaison program; and a community survey tool for regular numerical feedback.	

EXECUTIVE SUMMARY — ALL RECOMMENDATIONS

The table below reflects the status of all 21CP recommendations based on the actual current text of APD's 3-series policies, Policy 3.03, and the 21CP Recommendation Implementation Report as of August 2026.

Rec	Recommendation	Status	Source
1.1	Streamline core use of force policy	✓ INCLUDED IN POLICY	3.01
1.2	Philosophy: 'everyone goes home safely / everybody matters'	✓ INCLUDED IN POLICY	3.01
1.3	Mandatory ('shall') duty to de-escalate	✓ INCLUDED IN POLICY	3.01
1.4	Verbal warning requirements streamlined	✓ INCLUDED IN POLICY	3.01
1.5	Proportional force, totality of circumstances	✓ INCLUDED IN POLICY	3.01
1.6	Objective reasonableness — 12 factors, Graham v. Connor	✓ INCLUDED IN POLICY	3.01
1.7	Specific resistance type definitions	✓ INCLUDED IN POLICY	3.01/3.02
1.8	Exhaust less intrusive options before deadly force	✓ INCLUDED IN POLICY	3.01
1.9	Imminent threat — AOJ + proximity-to-weapon clarifier	✓ INCLUDED IN POLICY	3.01/3.02/3.10
1.10	Prohibit 1st Amendment force, retaliation; clarify chokeholds	✓ INCLUDED IN POLICY	3.01
1.11	Require officers carry less-lethal instruments	✓ INCLUDED IN POLICY	3.10
1.12	Affirmative duty to intervene — Policy 1.10 (11/28/2025)	✓ INCLUDED IN POLICY	1.10
1.13a	OC bystander caution — policy + Implementation Report	✓ INCLUDED IN POLICY	3.10/Impl.
1.13b	Prohibit OC on restrained persons absent immediate threat	✓ INCLUDED IN POLICY	3.10
1.13c	Scenario-based less-lethal training	✓ INCLUDED IN POLICY	3.01
1.14	Finalize Policy 3.08 — Canines	✓ INCLUDED IN POLICY	3.08
2	Dynamic, scenario-based use of force training	✓ INCLUDED IN POLICY	3.01
3	Training required concurrent with policy changes	✓ INCLUDED IN POLICY	3.01
4	Annual training: team tactics, peer intervention, de-escalation	✓ INCLUDED IN POLICY	3.01
5	Cross-cultural, LEP, procedural justice training	✓ INCLUDED IN POLICY	Impl.
6	Comprehensive aggregate use of force data collection	✓ INCLUDED IN POLICY	3.02
7	Revised force Level definitions	✓ INCLUDED IN POLICY	3.02
8	Post-OIS administrative leave — minimum 7 days	✓ INCLUDED IN POLICY	3.04
9.1	Substantive L1 supervisory / L2 senior command review	✓ INCLUDED IN POLICY	3.02
9.2	Audio/video recording of OIS investigative interviews	✓ INCLUDED IN POLICY	3.04
9.3	Supervisor (not peer) escort — 'if possible' qualifier remains	~ PARTIALLY ADDRESSED	3.04
9.4	Document BWC deactivation in all force reports	✓ INCLUDED IN POLICY	3.02
9.5	Adjudication categories focused on policy compliance	✓ INCLUDED IN POLICY	3.02
10	Add IA investigator — administrative/staffing action	⚙ OPERATIONAL — NO POLICY NEEDED	Admin

11.1	FRB mandatory review: all L3; 50% sample L2 with exceptions	✓ INCLUDED IN POLICY	3.03
11.2	FRB scope excludes non-force vehicle collisions — express exclusion added	✓ INCLUDED IN POLICY	3.03
11.3	FRB systemic training/equipment/policy review mandate	✓ INCLUDED IN POLICY	3.03
11.4	Supervisor recusal from biased force reviews	✓ INCLUDED IN POLICY	3.02/3.03
11.5	Adjudication categories revised to policy compliance focus	✓ INCLUDED IN POLICY	3.02
11.6	Mandatory tactical debrief after OIS adjudication	✓ INCLUDED IN POLICY	3.04/3.03
12	Communicate OIS adjudication outcomes — committee being formed	~ PARTIALLY ADDRESSED	3.04/Impl.
13	Family support / point of contact after OIS	✓ INCLUDED IN POLICY	3.04
14	Vehicle Tactics/Pursuits consolidated and revised	✓ INCLUDED IN POLICY	3.05
14.1	'Imminent threat' defined in vehicle context — AOJ standard + weapon-proximity clarifier	✓ INCLUDED IN POLICY	3.05
14.2	'Public risk' includes risk posed by the pursuit itself	✓ INCLUDED IN POLICY	3.05
14.3	Roadblocks prohibited during pursuits	✓ INCLUDED IN POLICY	3.05
14.4	Continuous risk re-evaluation during pursuit — § IV.B.1.e–f	✓ INCLUDED IN POLICY	3.05
15.1	No blocking/boxing when occupants armed — SWAT/ISU only	✓ INCLUDED IN POLICY	3.05
15.2	Pinning — <10 mph patrol-authorized absent known weapon; SWAT/ISU if armed	✓ INCLUDED IN POLICY	3.05
15.3	Ramming — prohibited unless supervisor authorizes as deadly force	✓ INCLUDED IN POLICY	3.05
15.4	PIT — 45 mph cap (APD decision); >45 mph = Level 3, mandatory FRB	✓ INCLUDED IN POLICY	3.05
16	Command field presence — all captains deployed May 2026	✓ INCLUDED IN POLICY	Impl.
17	Distribute strategic initiative ownership across leadership	✓ INCLUDED IN POLICY	Impl.
18	Public reporting on recommendations — 2x in 2025/2026	✓ INCLUDED IN POLICY	Impl.
19	Professional development / mentorship — Policy 9.07	✓ INCLUDED IN POLICY	Impl.
20	Enhanced EIP / peer support / in-house clinician	✓ INCLUDED IN POLICY	Impl.
21	Community engagement — MMIP coord., Pacific Islander liaison, etc.	✓ INCLUDED IN POLICY	Impl.

✓ 49 fully included	~ 2 partially addressed	✗ 0 not yet included	⚙️ 1 operational action
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Remaining Open Items — Specific Refinements

The following items represent the only remaining gaps or refinements as of August 2026. All are targeted and addressable in the next policy update cycle. Items closed since the July 2026 edition — Recommendations 11.2, 14.1, 14.4, 15.2 and 15.4 — have been removed from this list.

Rec 9.3	Supervisor escort provision in Policy 3.04: remove the 'if possible' fallback to companion officers and strengthen to require a supervisor or next-ranking uninvolved officer in all IA-investigated force incidents.
Rec 12	Codify in Policy 3.04 a provision requiring the Department to communicate final adjudication outcomes (to the extent permitted by law) to the community. Document the outside community review committee's formation and role in policy or an administrative directive.
Rec 13 (partial)	Consider expanding the Policy 3.04 point-of-contact provision to cover families of subjects involved in OIS events, not only officer families — consistent with APD's belief that everybody matters.
Rec 5 (formalize)	While training is occurring operationally, consider codifying the cross-cultural / procedural justice training requirement in Policy 3.01 to ensure continuity across leadership changes.
Rec 20 (complete)	Finalize and document the long-term behavioral health check-in program for personnel involved in critical incidents, currently listed as 'developing' in the Implementation Report.



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