

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 — <i>Restrictions on Use</i> ; 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 — <i>Training section</i> ; 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 — <i>Use of Canines (3-series policy finalized)</i>	
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 — <i>Training and Qualifications</i> ; 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: Impliment
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	<i>Policy 3.04 (transparency emphasis); 21CP Implementation Report</i>		
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	<i>Policy 3.04 — Treatment of Officer and family support sections; cites 21CP 13</i>	
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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