

REPORT FROM

OFFICE OF THE CITY ADMINISTRATIVE OFFICER

Date: May 12, 2023
To: The Mayor and Council
From: Matthew W. Szabo, City Administrative Officer
Subject: **STATUS UPDATE ON THE DEVELOPMENT OF A MULTI-YEAR PLAN FOR UNARMED RESPONSE AND POLICY CONSIDERATIONS FOR CREATING AN OFFICE OF UNARMED RESPONSE AND SAFETY**

CAO File No. 0220-06094-0000
Council File No. 22-0979, 22-0978, 22-0978-S1
Council District: All



SUMMARY

In response to Council Files 22-0979, 22-0978, and 22-0978-S1, this report outlines the background, findings and recommended path forward to develop a proposed scope and multi-year plan for the City's alternative response¹ framework. This 'framework' refers to four key aspects of a citywide plan for alternative response, including:

1. The primary objectives for an alternative response program;
2. The scope of services that could be appropriately diverted to unarmed responders and/or co-response;
3. A structural and organizational plan, including potential centralization into a consolidated infrastructure; and,
4. A multi-year plan to expand unarmed programs to provide 24/7 citywide service and potentially expand the scope of those services, as appropriate, including the determination of funding sources.

This office conducted preliminary research and analysis of nationwide and local alternative response programs, data on emergency and non-emergency calls for services, and documented public opinion. Insights from this research presented several ways in which potential goals of an alternative response program could impact the scope, organization, and expansion of unarmed response services. This report proposes operational considerations for a centralized office of unarmed response, including the purview, responsibilities, and potential benefits of such an office. In addition, it provides specific considerations for expansion of existing programs and for determining the potential long term costs of an alternative response program.

The two most salient conclusions of this report are as follows: First, the development and successful implementation of the citywide framework for alternative response will require further insight, collaboration, and strategy. The proposed framework must be developed with concurrence from City leaders on the fundamental purpose of the City's unarmed response and co-response

¹ Alternative response includes any type of unarmed or co-response program that is intended to supplement traditional emergency response.

programs. Second, the parameters of the City's alternative response objectives, scope, organization, and expansion must be developed over time, based on additional research and analysis, garnered insights from new pilots and existing programs, and with direction from City leaders.

RECOMMENDATIONS

1. That the Mayor and City Council consider and confirm the City's primary objectives for alternative response and the intended purpose of an Office of Unarmed Response, as outlined in this report;
2. That the City Council:
 - a. Instruct the Office of the City Administrative Officer (CAO) to develop a robust performance management and evaluation program for the Unarmed Model of Crisis Response Pilot, if implemented, to monitor and gather key insights from the successes and opportunities from the pilot year;
 - b. Instruct the CAO, in consultation with the Office of the Chief Legislative Analyst (CLA), the Mayor's Office of Community Safety, the Los Angeles Police Department (LAPD), and other partners to report back within 90 days, on progress to determine which 9-11 call types are appropriate to divert to alternative response models, and specifically:
 - i. Which of these calls should be assigned to an Office of Unarmed Response;
 - ii. Which of these calls are currently addressed by existing programs, which may be addressed by expanding existing programs and which would require new programs;
 - c. Instruct the CAO, in consultation with the Office of the CLA, the Mayor's Office of Community Safety, LAPD, and other partners to report back with regular updates to the City's alternative response framework based on the shared vision, including:
 - i. Reports on key leadership decisions and community feedback;
 - ii. Updates on potential costs and timeline for program expansion;
 - iii. Analyses of current programs' performance metrics and data.

BACKGROUND

This report aims to provide pertinent information to assist policymakers in developing a comprehensive framework for alternative response programming in the City. This requires major policy, programmatic, and operational changes in how the City of Los Angeles responds to crises. The implementation of alternative response programs is fundamental to one of the most complex and impactful issues of our time: reimagining public safety.

The City's traditional crisis response is split between the Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), and Emergency Management Department (EMD). EMD is the city's leader for planning for, responding to and recovering from major disasters while LAPD and LAFD respond to daily emergency and non-emergency calls for service. LAFD is responsible for calls for service for fires and medical emergencies while LAPD traditionally responds to all other crises – and often as additional support for LAFD calls. Over time, this has resulted in sworn LAPD

officers acting as first responders for calls for service related to mental health, homelessness, welfare checks, and a variety of other crises that bear little relation to law enforcement.

Recognizing that LAPD lacks the resources (both in expertise and staffing capacities) to effectively respond to every manner of emergency situation, the City has, over decades, developed and implemented various strategies to increase sworn police officer capacity, including training programs, recruitment campaigns, and innovative co-response models.

In the last several years, both before and subsequent to the uprisings after the murder of George Floyd, the City created a variety of new pilots and programs to divert emergency response to new unarmed response services. This shift allows for a new option: a citywide program of unarmed responders. These unarmed responders include personnel trained, organized, and deployed to respond to 9-1-1 calls for service for assistance or intervention in non-violent situations, including those where the presence of law enforcement personnel equipped with firearms and other tools that could result in a use of force is not required. This strategy has myriad potential benefits, which will be explored in this report, including the potential to reduce use of force, more effectively utilize sworn police resources, and provide more appropriate services to individuals in crisis.

Legislative Status

This report is specifically responsive to C.F. 22-0979, C.F. 22-0978, and C.F. 22-0978-S1, but also endeavors to address the various ongoing conversations around the creation of a Citywide unarmed response program and an Office of Unarmed Response.²

Since 2020, there have been more than twenty-five City Council motions covering various aspects of unarmed response.

This report provides a status update to the Bonin, Harris-Dawson, Raman, Rodriguez – De Leon Motion (C.F. 22-0979) on the development of a multi-year transition plan to shift responsibility for nonviolent calls related to homelessness and emergency crisis response to unarmed personnel, including alternative models for traffic safety enforcement that do not rely on armed law enforcement officers.³

Since the adoption of Council File 22-0979, additional motions have been adopted directing more immediate steps to create an Office of Unarmed Response and Safety, including direction for the transfer and appropriation of \$1,000,000 from the Unappropriated Balance to a new account in the General City Purposes fund for the creation of an Office of Unarmed Response and Safety and additional direction for the CAO and CLA to report with recommendations relative to the operations, functions, and organizational location of the Office (C.F. 22-0978-S1). Additionally, the CAO recently released a report (C.F. 20-0769-S6) with recommendations to negotiate and execute service agreements with Alcott Center for Mental Health Services, Exodus Recovery, Inc. and

² This report does not make recommendations on unarmed traffic safety enforcement, as the Los Angeles Department of Transportation (LADOT) is working on a forthcoming report that will outline the findings of a consultant study on the feasibility of civilian enforcement of traffic laws in the City of Los Angeles (C.F. 20-0875).

³ This report does not address traffic safety enforcement in depth as this topic will be covered by the forthcoming LADOT report.

Penny Lane Centers to provide unarmed crisis response services for a one-year pilot term as directed by Council File 20-0769.

With the potential for the near-term development of a new unarmed response pilot program with the three aforementioned service providers in mind, this report also responds to the Blumenfield, De Leon, Martinez, O'Farrell, Price, Rodriguez – Raman Motion (C.F. 22-0978) and the Blumenfield, Harris-Dawson – Hernandez motion (C.F. 22-0978-S1) instructing the CAO and the Office of the Chief Legislative Analyst (CLA) to report on recommendations to create an Office of Unarmed Response and Safety, including recommendations relative to its operations, functions, and organizational location.

A subsequent CAO and CLA report will address potential long-term funding models for unarmed response programs.

Research Methodology

To establish a schema for this Office's research efforts and to identify impetus behind the recommendations of the policymakers, this Office reviewed several of the City Council motions related to the creation of an unarmed response model in the City, sought the insights from staff within the Offices of the Chairpersons of the Public Safety Committee, the Budget, Finance and Innovation Committee, and the newly established Mayor's Office of Community Safety.

This Office also conducted research into existing and best practices and insights both internal to the City and as provided by external agencies and experts, including:

- Analysis of 9-1-1 Calls for Service Data (2018-2022)⁴
- Review of the report issued by the Los Angeles Police Department (LAPD) to develop an unarmed model of crisis response to divert non-violent calls for service away from the LAPD (C.F. 20-0769-S3)⁴
- A high-level review of the initial list of categories of calls for service the Los Angeles Police Protective League (LAPPL) identified as potential calls for an unarmed responder rather than a sworn police officer⁴
- Review of current pilots and existing programs in the City of Los Angeles and interviews with practitioners to identify types of calls handled, areas served and hours of operation⁵
 - Didi Hirsch (CRESS and Southern California 9-8-8 operator)
 - Urban Alchemy (CIRCLE)
 - LAFD Emergency Medical Services Bureau
 - Gang Reduction Youth Development (GRYD)
- Research on unarmed response pilot programs in other U.S. Cities and interviews with practitioners to identify the agencies involved, the types of calls handled, composition of response teams and hours of operation⁶:
 - Denver Support Team Assisted Response (STAR) - Denver, CO

⁴ Additional information is provided in Appendix A.

⁵ Additional information is provided in Appendices B and C.

⁶ Additional information is provided in Appendix D.

- Albuquerque Community Safety Department (ACS) - Albuquerque, NM
- Mediation Response Unit (MRU) - Dayton, OH
- Interviews with additional unarmed response or emergency response experts and practitioners, including:
 - Advising organization for LA County Department of Mental Health (DMH)'s 9-8-8 expansion program
 - LADOT Vision Zero, Active Transportation, and Neighborhood Streets
 - LAPD Communications Division - to research the 9-1-1 dispatching process⁷
- Attended key informational sessions from NYU's Policing Project and reviewed the VERA Institute of Justice, Civilian Crisis Response: A Toolkit for Equitable Alternative to Police and the Council of State Governments Justice Center, A Toolkit for Community Responder Programs
- Review of documented public opinion of unarmed response
 - Community feedback to help inform the parameters of an unarmed crisis response program within the City (C.F. 20-0769-S3)
 - 2022 Police and Community Relations Survey conducted by the Loyola Marymount University (LMU)

Defining Alternative Response

The term "alternative response" encompasses a variety of services and models, provided by varying service providers, with differing objectives. This discussion is informed, in part, by the Chief Legislative Analyst's report in response to Council File 20-0769-S5. Below is an overview of the most common response models:

- **Traditional Emergency Response** – First responders focused on and equipped to respond to urgent crisis situations for purposes of harm-reduction through an armed law enforcement response, emergency medical services (EMS), a fire suppression/rescue response, or a combination.
- **Alternative Response** – Alternative response includes any type of unarmed or co-response program that is intended to supplant traditional emergency response.
 - **Unarmed Response** – Any response program that *does not include an armed law enforcement officer*. Additionally for purposes of this report, unarmed response does not include any EMS or fire suppression/rescue traditionally performed by the fire department or broad-scale emergency response coordination performed by the Emergency Management Department (EMD). Unarmed response may include specialized civilian responders or unarmed law enforcement officer units. Not all of the incidents responded to are urgent, or represent a threat to life or safety. It should be noted that jurisdictions vary on how to define "armed." Some jurisdictions provide unarmed crisis response with non-lethal defense mechanisms such as pepper spray, whereas others issue no protective devices whatsoever.
 - **Unarmed Crisis Response** – Any unarmed urgent, emergency, or crisis response program, including specialized crisis response programs which focus on a target population or service call type by professionals trained to

⁷ Additional information is provided in Appendix A.

respond to that particular type of crisis (medical, mental health, substance abuse, homelessness, etc.). This may include an in-person, telephone or virtual response.

- Unarmed Enforcement Response – This may include response to requests for service which are deemed low priority, low acuity, or non-emergency through traditional 9-1-1 call triaging. These calls should be addressed by personnel with a degree of enforcement authority over the types of violations to which they are dispatched to address.
- Conflict Resolution – This may include response to calls for service which are deemed low priority, low acuity, or non-emergency through traditional 9-1-1 call triaging, which could be addressed with conflict resolution or mediation. These calls include minor disputes and disturbances.
- Co-Response Units – Any crisis response units which include an armed law enforcement officer and an unarmed, yet specialized, trained professional to respond to calls for specialized service. Co-response units are commonly deployed where there is reasonable risk of escalation.

Under this framework, the City operates several, alternative response models managed by various departments, with differing scopes of service, coverage areas, and hours of operation (See Attachment B). Namely, the City has six (6) existing unarmed crisis response programs and one (1) pending unarmed crisis response pilot program. These seven programs consist of four programs managed by LAFD (dealing primarily with substance abuse, mental health crises, and on-scene medical care), LAPD's contract with Didi Hirsch to provide telehealth services for individuals in suicidal crises, the Mayor's Office contract with Urban Alchemy to provide non-emergency, nonviolent 9-1-1 calls involving persons experiencing homelessness, and if approved, the CAO will administer three contracts (with PennyLane, Exodus Recovery, Inc. and Alcott Center) for mental health and related services.

- *LAFD - Advanced Provider Response Unit (APRU)*
- *LAFD - Fast Response Vehicles (FRV)*
- *LAFD - Sobriety Emergency Response Unit (SOBER)*
- *LAFD - Therapeutic Van*
- *LAPD - Call Direction to Ensure Suicide Safety (CRESS)*
- *Mayor - Crisis and Incident Response through Community-led Engagement (CIRCLE)*
- *CAO - Unarmed Model of Crisis Response Pilot*

In addition to the unarmed crisis models referenced above, LAPD maintains two co-response models operating out of its Mental Evaluation Unit (MEU) where an armed law enforcement officer and a specialized service provider are jointly dispatched to service calls. The Mayor's Office of Public Safety also manages an additional co-response program.

- *LAPD - Systemwide Mental Assessment Response Team (SMART) / Case Assessment Management Program (CAMP)*
- *LAPD - Domestic Abuse Response Team (DART)*

- *Mayor's Office - Crisis Response Team (CRT)*

The City also has three programs managed by independent elected offices that seek to resolve conflicts through diversion, alternative dispute resolution, and mediation with the purpose of de-escalating situations that could potentially result in a call for emergency service. Although these programs are not directly tied to calls of service through the city's emergency and non-emergency lines, they may provide support after crises as well. It is therefore important to consider these programs in the development of an alternative response framework.

- *City Attorney - Connecting Neighborhood Justice Program (NJP)*
- *City Attorney - Dispute Resolution Program (DRP)*
- *Mayor's Office - Gang Reduction and Youth Development Program (GRYD)*

The City has many unarmed enforcement entities that ensure compliance with City regulations and rules. This includes Traffic Safety Officers, Park Rangers, Street Services Investigators, Housing and Building Inspectors, Animal Control Officers, and more. These various roles often cover different jurisdictions, focus on specific rules or regulations, and may have limited staffing and hours of service. Under limited circumstances LAPD armed officers sometimes serve to fill the gaps of these various enforcement programs due to staffing issues or complaints received through LAPD's non-emergency line.

FINDINGS

Framework for Alternative Response

Foundational to developing a 'framework' for the City's alternative response program is determining the ultimate purpose and goals for this program.

Framing the purpose and goals for the program provides the basis to assess which elements of alternative response should fall within the scope of the City's plan. This framing also guides the development of the City's plan for expanding, consolidating, and/or coordinating the City's alternative responses to calls for service.

The determination of which service calls should be addressed by this program also impacts how the supporting infrastructure should be governed. Currently, the City's unarmed response programs are decentralized across city departments (see Appendix B). A fundamental determination must be made as to whether the most effective strategy is to expand the existing and pilot the new programs in a decentralized manner, whether to consolidate some programs and leave others in place, or whether to consolidate all programs into one Office of Unarmed Response. There are benefits and detriments to each of these options, many of which are explored within this report.

The decision to centralize some or all of the City's alternative response programs dovetails into the determination of what operational considerations and supporting resources would be necessary for implementation. Operational considerations include how dispatch of the responders would be structured, and how the leadership, workforce, interagency collaboration, and accountability would be implemented and managed.

In sum, to establish a framework for the future of unarmed response, the City must:

1. Clearly establish its objectives for the alternative response plan;
2. Determine the scope of services that could be appropriately diverted to unarmed responders;
3. Resolve how these programs should be structured within the City and how that infrastructure should operate – including whether any or all of these programs might be centralized into a consolidated infrastructure and whether and how these programs may be brought in house; and,
4. Evaluate how and where City unarmed response programs should be expanded.

This report explores this proposed framework below.

OBJECTIVES SCOPE OF ALTERNATIVE RESPONSE

Primary Objectives for Alternative Response

Based on an analysis of the legislative history of this subject, including key Council motions and discussions, and particularly the seven categories of programs which were suggested by Council to be considered for alternative response (namely people experiencing homelessness, mental health, substance abuse, suicide threats, behavioral distress, conflict resolution, and welfare checks) this Office recommends that the City's alternative response strategy is built around three key objectives, to support its success.

1. Improve social and mental health services for individuals in crisis or for select demographics (i.e. people experiencing homelessness).
2. Improve the efficacy of sworn police officer deployment.
3. Reduction in use of force incidents in non-violent calls.

These objectives are further outlined below to provide further guidance on key policy questions for the alternative response framework.

Primary Objective 1: Improve social and mental health services for individuals in crisis or for select demographics (i.e. people experiencing homelessness).

This is recommended as the first objective for guiding the City's alternative response program as it has the clearest scope and mission, the City's programs in this area are the most established, and is agreed upon as a priority by the public, political leaders and law enforcement.

To determine the scope of response needed, it is recommended that 9-1-1 call data is thoroughly analyzed (see following section for initial analysis) and a partnership between LAPD and the CAO's office is developed to envision the potential future and scale of these programs.

To ensure that alternative response programs meet the City's intended vision, the City should also conduct an overarching review of existing pilot program scope, effectiveness and performance. This review will allow for better informed decision making regarding individual program refinements and expansions in line with the vision.

Primary Objective 2: Improve the efficacy of sworn police officer deployment.

This is recommended as the second key objective for the City’s alternative response pilot, as a more comprehensive and ongoing analysis of LAPD’s capacity, and the possibilities of alternative response programs in diverting a broader scope of 9-1-1 calls is needed to determine the scale and programming needed to effectuate this objective.

LAPD officers respond to a high volume of calls for service, and are frequently expected to respond to incidents more appropriate for response by other departments often because other agencies and service providers have limited hours or staff limitations. This is especially true at night and on the weekends as LAPD is one of the few public services with 24/7 operations. By reducing the scope of police officers’ first responder duties, LAPD officers can address matters for which they are primarily responsible and trained to respond to which will increase the efficiency of LAPD deployment.

To gain preliminary insight on which call types may be appropriate for diversion, this Office collaborated with LAPD Communications Division to conduct an exploratory analysis of all 9-1-1 calls for service data from January 2018 through March 2023.⁸ Within the time-frame analyzed, the LAPD recorded over 4.7 million calls for service. As illustrated in Table 1, the majority of these calls were considered Priority II calls, at 45 percent of the total, followed closely by Priority III calls at 41 percent. Call prioritization determines the time frame for call assignment and the manner in which police are required to respond. Priority III calls are deemed routine and are not of an urgent nature, Priority II calls are urgent but not life threatening, and Priority I calls pose a significant public hazard, involve preservation of life, indicate a crime in progress, or the prevention of a serious crime.

Table 1. Total incidents by Priority (2018-2023)

Coded Response	Incidents Recorded	Percent of Total
Priority III	1,933,936	41%
Priority II	2,107,195	45%
Priority I	676,446	14%
Total	4,717,577	

This Office explored the idea that Priority III incidents could be most easily diverted from armed police response due to their relatively low risk level. Based on a further analysis of the most frequently used Priority III incident types (Table 2) and discussions with law enforcement personnel, it was found that the specific details underlying each call cannot be inferred from the broad ‘incident type’ - each incident type contains a wide variety of circumstances which impact the risk level of the call, including, criminality, its relationship to substance abuse or mental health, etc.

⁸ The numbers within this section are merely illustrative and not intended to be an accurate reflection of the scale of calls for service which these programs may serve. Deeper analysis is required to refine these numbers. See Appendix A for more information.

Table 2. Top 10 Priority III Incident Types by Call Volume

Incident Type	Incidents Recorded
906B1 - Alarm (Code 30 Ringer)	246,043
415M - Disturbance (Man)	226,908
9212- Prowler (Trespass Suspect)	176,801
415G - Disturbance (Group)	168,691
507P - Minor Disturbance (Party)	111,989
507R - Minor Disturbance (Radio)	109,656
415W - Disturbance (Woman)	72,167
9045 - Traffic Collision (Hit & Run)	62,153
459I - Burglary (Investigation)	58,583
620N - Dispute (Neighbor)	57,298

For example, an incident categorized as a 415M incident type can involve a situation in which a man is panhandling in front of a business, where no weapons or criminal activity have been confirmed by the caller. This particular situation is likely appropriate for diversion to an unarmed practitioner such as a social worker or peer counselor. Alternatively, an incident categorized as a 415M incident type can also involve a man yelling in front of business making verbal threats and aggressive statements. Similarly, no weapons or criminal activity are confirmed by the caller, but the man’s aggressive yelling may make this situation less appropriate for an unarmed response and perhaps more appropriate for a co-response.

Incidents related to trespass suspects (prowler), a hit and run traffic collision, and burglary investigations are likely to be criminal in nature, and therefore would likely continue to be appropriate for an enforcement response, whether armed or unarmed. Additionally, dispute calls may stem from enforcement related issues (e.g. noise complaints, loitering, etc.) and could also continue to be appropriate for an enforcement response. A deeper analysis in collaboration with LAPD is needed to more accurately estimate which call types would be appropriate for diversion, and under what circumstances.

This office also estimated the number of Priority III incident types likely to fall under the areas of work which were identified by the City Council as priorities for expanding city unarmed response programs. As seen in Figure 1⁹, the highest number of relevant ‘incidents’ was recorded in 2020 at 224,463. Across all incident types, minor disturbances were reported most frequently totaling 247,589 from 2019 through 2022. The category ‘Conflict Resolution’ includes various call types which may also be considered enforcement related, depending on the incident details.

⁹ Incidents included in the ‘homeless-related’ category were not a clear list of incident types but rather those that were tagged as involving a person experiencing homelessness by PSRs. See Appendix A for more information.

Figure 1: Annual Total Volume of Priority III Calls for Potential Diversion

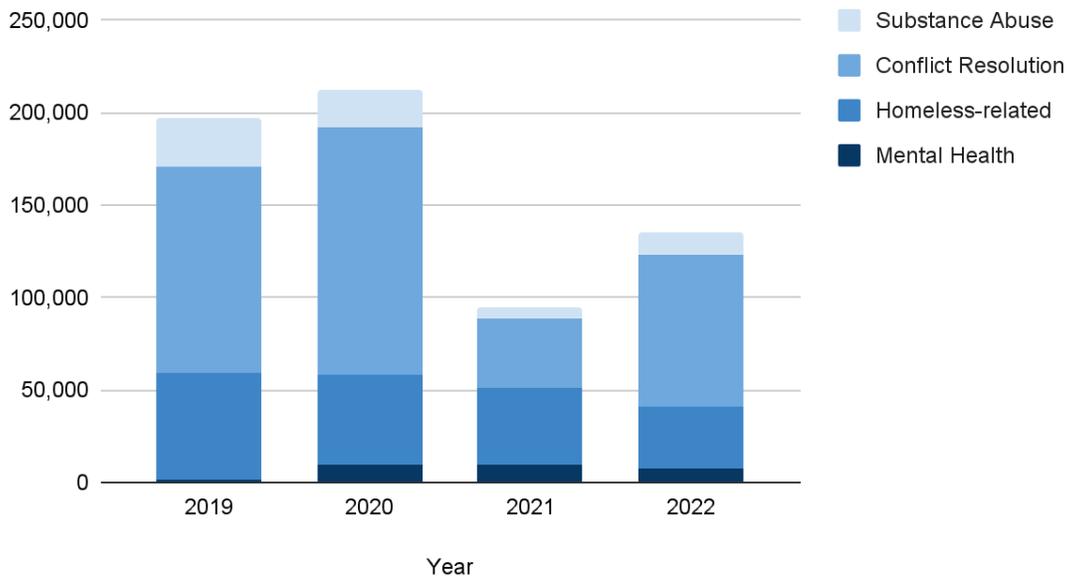
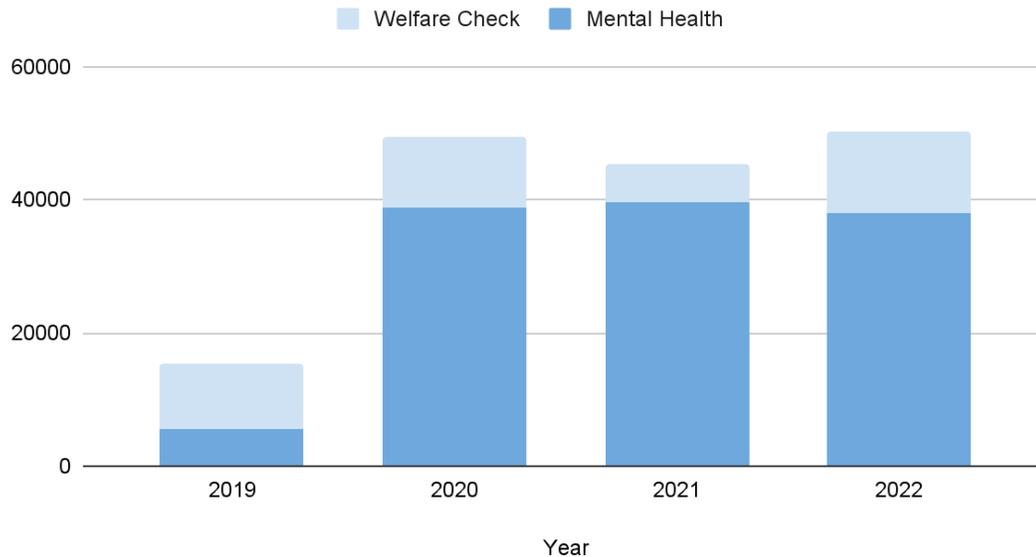


Figure 2: Priority II & III Welfare Check and Mental Health Related Incidents



Some Priority II calls for service, which are urgent but not life threatening, could also be considered for unarmed response (Figure 2). Since February 1, 2018, per LAPD Division Order No. 3, all welfare checks should be created as Priority II. Per the LAPD Communications Division, it is also a best practice for mental illness calls for service to be created as Priority II calls.

Primary Objective 3: Reduction in use of force incidents in non-violent calls

While this is a vital outcome of alternative response programs, this is recommended as objective 3, as an initial analysis of use of force (UOF) determined that the City’s current strategy of diverting only non-violent calls for service and focusing on targeted programs may not be enough to prevent

the more severe impacts of UOF. When considering the reduction of use of force, the City must consider how to prevent these encounters through a variety of avenues, including reducing the presence of armed officers in response to non-violent and non-criminal calls for service, training and technology changes, and ultimately improved tactics (including co-response).

This Office conducted an initial, high-level analysis of LAPD's publicly released data on non-categorical use-of-force (NCUOF) and Officer Involved Shootings (OIS). OIS make up a significant portion of the City's categorical use of force (CUOF) incidents, which tend to be more severe in nature, and include the use of deadly weapons or incidents which result in hospitalization or death. Non-categorical use of force (NCUOF) is "physical force or a control device to compel a person to comply with the employee's direction; defend themselves, defend others, effect an arrest or detention, prevent escape or overcome resistance" These incidents tend to be less serious in nature and are more common.

The LAPD UOF report found that in (~98%) of OIS incidents, the suspect had a weapon. Since the City's current unarmed response programs only respond to non-violent calls, these programs alone may not be enough to avoid OIS. This indicates a need for additional strategies for preventing OIS, including expanding co-response models and determining if unarmed response programs may be applied to more high risk calls as these programs may be better equipped to avoid on scene escalation.

Table 3 includes data that reflects that specific groups were disproportionately involved in OIS and Non-Categorical use-of-force in the last five years. Communities of color and men disproportionately experience NCUOF and OIS, both groups making up a significant majority of incidents. Individuals experiencing a mental health crisis represented 30 percent of individuals involved in an OIS incident from 2018-2022. PEH represented 17 percent of individuals involved in an OIS incident, while only making up about one percent of the city's population. This indicates that diverting calls related to these populations may be a useful strategy in reducing use of force for these vulnerable populations. Local and national unarmed response programs have shown that, if at the time of dispatch there is no known threat of violence, these calls can be successfully and safely diverted for unarmed response. Thus, the City can use 9-1-1 dispatch data to evaluate opportunities for increased diversion for these populations.

Table 3. Share of total individuals involved in OIS incidents and Use of Force incidents compared to their share of total population in the city 2018-2022

Group	Share of total individuals involved in OIS incidents ¹⁰	Share of total individuals involved in UOF incidents ¹⁰	Share of Population
Individuals Experiencing Mental Health Crisis	31%	30%	N/A
People Experiencing Homelessness (PEH)	28%	17%	~1% ¹¹
Black Individuals	36%	28%	9% ¹²
Hispanic Individuals	46%	57%	48% ¹³
Men	80%	94%	49% ¹³

While mentally ill individuals and PEH are overrepresented in both OIS and NCUOF incidents, the majority of OIS and NCUOF incidents involve people other than these particular groups. Specialized programs aimed at particular populations may not be enough to significantly reduce overall UOF incidents. 9-1-1 calls for service do not always include demographic data, which may limit the ability to see how diversion could reduce disproportionate impacts of use of force on communities of color and men.

A further analysis of UOF data in combination with 9-1-1 data may provide more information on which additional incident types may lead to UOF incidents and may be appropriate for diversion to reduce UOF both broadly and for overrepresented groups.

Secondary objectives

In addition to the primary objectives, alternative response programs provide further benefits to the City. These complimentary or auxiliary goals, some of which are listed below, will be instrumental in the process of developing appropriate metrics to track the progress and success of an alternative response framework holistically:

- Reducing the likelihood of crisis escalation
- Connecting individuals in crisis to other City and County services
- Reducing 9-1-1 call center wait time
- Increasing the safety of historically marginalized communities
- Improving community cohesion and welfare
- Building public trust in city government

¹⁰ Los Angeles Police Department (2023). *Use of Force Year-end Review 2022*.

¹¹ Estimate based on 2022 Greater Los Angeles Homeless Count data

¹² Estimate based on U.S. Census Bureau data

Existing Proposals for LAPD Call Diversion

In addition to the analyses discussed above, LAPD and Los Angeles Police Protective League (LAPPL) have recommended various types of calls which may be diverted from police response. A significant portion of these calls are related to enforcement.

The LAPD identified three categories for potential diversion (C.F. 20-0769-S3), including public intoxication/overdose (substance abuse), minor disputes (conflict resolution), and welfare checks.¹³

The City's Basic Car Area Boundary study, provided by Matrix Consulting in 2021 (C.F. 17-0860) provides an analysis of the 2019 deployment of sworn police patrol resources to identify changes needed to LAPD Basic Car Areas to improve the allocation of sworn patrol resources and delivery of services. Matrix Consulting projected that 12 percent of LAPD's low priority, non-emergency calls could be diverted to a civilian response resource. These calls would include dated burglary reports, minor non-injury accidents, directing traffic, abandoned vehicle enforcement, stranded motorists, and missing persons reports.

Additionally, in a report back to Council File 20-0769, relating to a review of the CAHOOTS program, LAPD also recommended that online reporting may be an alternative to certain in person armed police responses. Reports filed online increased by over 375% between 2019 (11,826 filed online) to 2021 (55,852 filed online) largely due to the expansion in report types which could be filed online. Online reports can be filed in relation to the following incident types: harassing phone calls, lost property, vandalism, identity theft, personal property theft from public locations or vehicles, minor traffic collisions, hit and run incidents, and tips relating to vice or narcotics.

The CLA is working on a comprehensive analysis of the LAPPL list of calls¹⁴ that could be redirected away from LAPD sworn police officers (C.F. 23-0258). A preliminary analysis found that the LAPPL proposed calls had considerable overlap with the categories proposed by council, except that the LAPPL list included several enforcement activities such as illegal dumping and unpermitted sidewalk vending.

The forthcoming LADOT report on alternative models and methods for traffic safety enforcement that do not rely on law enforcement (C.F. 20-0875) should also inform this discussion.

Public Opinion

Several surveys have confirmed strong public support among Angelenos for unarmed and/or alternative models of public safety response. In a June 2021 Council report on Council File 20-0769-S3, this Office presented detailed findings from a survey conducted in early 2021. Overall, the majority of respondents (74%) believed that a robust unarmed crisis response program would benefit their community.

Support for mixed-teams responding to various call types has increased over time: in 2020, 53% of Angelenos favored pairing officers with mental health workers; that number grew to 64% in

¹³ See Appendix A for more information.

¹⁴ See Appendix A for the list of 9-1-1 call categories identified for potential diversion from sworn police officers.

2022.¹⁵ Across a range of emergency call types, the majority of survey respondents preferred mixed-teams responding to calls regarding mental health crises, sexual assault, domestic violence, substance abuse, homelessness, and neighbor disputes. In contrast, they preferred only LAPD officers to respond to crimes such as shootings and burglaries. No call types received a majority support for responding only with non-police alternatives.¹⁶

Additionally, when it comes to dealing with people having a mental health crisis while experiencing homelessness, cleaning up encampments, or policing encampments, over 62% supported LAPD taking a supporting role within the multidisciplinary team.¹⁷

Other Cities

Nationwide, a variety of unarmed response programs and pilots have emerged that respond to specific 9-1-1 call categories. Programs reviewed by this Office include those summarized in the CLA's report in response to Council File 20-0769 as well as programs highlighted in the Council of State Governments Justice Center, A Toolkit for Community Responder Programs. Additionally, this Office interviewed staff from the cities of Denver, CO, Dayton, OH, and Albuquerque, NM to glean more specific insights about their respective programs.¹⁷ This Office found that most programs respond to one or more of the following categories of calls:

- Mental health, behavioral concerns, substance abuse or suicidal ideation. This may include on-scene crisis intervention and de-escalation assistance, as well as psychiatric holds and transportation to service providers.
- Persons experiencing homelessness. This includes on-scene services or referrals for additional resources.
- Welfare checks. Many of these involve unhoused individuals or general concerns about the welfare and safety of family members out of touch.
- Non-criminal disputes and/or incidents between family members, neighbors, roommates, and landlords/tenants. This includes on-scene de-escalation and conflict resolution services

Recommendations on Objectives and Scope of Alternative Response

Based on the preliminary analyses conducted, research into best practices, Council direction, LAPD and LAPPL recommendations and public opinion, this Office recommends that the types of programs that should be considered for alternative response programs are categorized as follows:

- Mental and behavioral health (including behavioral concerns, substance abuse or suicidal ideation)
- Homelessness (includes some welfare checks)
- Conflict resolution and Community Welfare (includes some welfare checks, minor disputes and disturbances)

¹⁵Jany, L. (2022, September 28). *Survey: Most Angelenos have favorable view of LAPD, despite lingering concerns around bias*. Los Angeles Times.

¹⁶ Thomas and Dorothy Leavey Center for the Study of Los Angeles (2022). *Police Data Brief: 2022 Police and Community Relations Survey*. Loyola Marymount University, Los Angeles, California.

¹⁷ See Appendix D for a summary of details from various programs reviewed.

- Unarmed Enforcement (includes various call types which were outlined by LAPPL and the Basic Car Boundary Study)

The two major areas in which the City does not currently have an unarmed response function are conflict resolution and unarmed enforcement. More extensive research into current enforcement practices across the City is required to determine if an unarmed enforcement strategy should be a part of the City's alternative response strategy, what elements it should cover, where it should be housed and what its objectives should be. This research should cover rules and regulations regarding enforcement authority, and the efficacy of various unarmed enforcement models.

As part of the development of the City's alternative response framework, further research is needed on the appropriate definition of "crisis" for purposes of determining what falls under the City's "unarmed crisis response" programs (i.e. should every call or report related to persons experiencing homelessness be considered a crisis or emergency, what types of mental health calls are considered emergency and which are not).

Next Steps for the City's Objectives and Scope

Upon confirmation of the City's objectives for unarmed response, this Office will engage with departments and external partners to conduct further research to refine which of the recommended categories discussed above should continue to be considered for diversion. This includes determining which calls for service pertain to the recommended categories and what protocols need to be developed to determine if individual calls can be diverted. Additionally, this Office proposes that the determination for unarmed response also considers under which circumstances co-response or other multidisciplinary teams would be most appropriate. Following this, a gap analysis will be conducted to determine what portion of these calls is currently being answered by existing programs, and provide an update to this framework.

OFFICE OF UNARMED RESPONSE

Per Council Files 22-0978 and 22-0978-S1, the City Council recommended the creation of an Office of Unarmed Response and Safety. Such an office could provide a permanent infrastructure for unarmed response programs and streamline operations as these programs continue to evolve and grow. The scope of this office should be informed by the objectives for the citywide framework on alternative response.

Proposed Responsibilities for an Office of Unarmed Response and Safety

Although there is uncertainty over the full breadth and responsibilities of an Office of Unarmed Response and Safety, the following section outlines key functions that could fall under its purview.

Service Provision

An Office of Unarmed Response and Safety could be responsible for; 1) direct service provision for unarmed response with in-house unarmed response field staff; 2) the coordination of unarmed response programs that are housed across city departments; 3) the administration of unarmed response contracts; or, 4) a combination of all three models. This will depend on final decisions on the City's overall unarmed response framework.

As part of the creation of a citywide framework for alternative response, this Office will report back on which of the recommended call for service categories should be diverted to alternative response. This will allow city leaders to further distill what services should be under the purview of an Office of Unarmed Response and Safety. In the short term, this Office recommends that any Office established to oversee the City's unarmed response framework should have responsibility for the management and oversight of the Unarmed Model of Crisis Response Pilot, managed on an interim basis by this Office.

However, it is not recommended that an Office of Unarmed Response and Safety serve as an unarmed enforcement agency. If the office's primary goals are to reduce use of force and improve the provision of social and mental health services, the enforcement of specific laws and codes may be in conflict with this mission. An enforcement focus may reduce the office's ability to succeed in building trust with Angelenos as community partners and not as a punitive body.

Accountability of Unarmed Response Programs

Creating one office that is ultimately responsible for unarmed response programs could allow for increased accountability for residents and more effective management of programs towards the City's ultimate goals around unarmed response. A single Office of Unarmed Response and Safety could provide oversight for performance management, program evaluation, and community engagement.

Performance Management & Program Evaluation

The key to any successful program is the continual monitoring and evaluation of the effectiveness and impact of the program. Therefore, it is recommended that any Office of Unarmed Response and Safety, establish a performance management system to ensure that the office is addressing community needs, providing effective services, and meeting key objectives and goals.

In addition to performance management, an Office of Unarmed Response and Safety should ensure they are meeting their desired outcomes and goals for unarmed response in the City, by working internally, and/or working with external partners to implement program evaluations. These evaluations could measure program effectiveness and impacts, as well as program equity.

Community Engagement

An Office of Unarmed Response and Safety should have a mechanism (whether in-house or otherwise) to receive regular public engagement feedback (ideally tied into their performance management function), which would allow the office to gain regular insights into existing programs and community needs. Additionally, such public engagement efforts would increase public awareness of alternative response programs, inform the public how to request unarmed response, and enhance community trust for these programs. The Office should also work closely with the Mayor's Office of Community Safety to incorporate learnings from their public engagement strategies.

Inter-Agency and Inter-Departmental Collaboration

Based on interviews conducted supporting the development of this report, collaboration with other emergency response providers is critical for the success of alternative response programs.

Inter-agency and inter-departmental collaboration, training and communication must begin as early as the development phase of new pilots and programs so that these programs can become embedded into daily operations and systems. An Office of Unarmed Response and Safety should work closely with a variety of city leaders, departments such as LAPD and LAFD, and external agencies, including the Los Angeles Department of Mental Health (DMH), to ensure that there is agreement on roles and responsibilities, that unarmed response programs are successfully implemented and agencies can cooperate effectively to connect individuals in crisis with appropriate services.

In an interview with staff from the Mediation Response Unit in the City of Dayton, OH it was noted that they spent extensive time at police roll calls to develop trust and buy-in with officers. They would ensure there was understanding that their unarmed response program was intended to tackle the calls officers were less comfortable resolving, and that it was as much a resource to them as the public.

A key aspect noted by other cities is that this trust-building among first-responders is vital to real time communication and response. Given the nature of 9-1-1 calls for service, situations may quickly change and the ability to reconnect with a police and/or fire dispatch may be life-saving for a caller. Many cities also provide examples where officers arriving at the scene used their unarmed response program training to determine that an unarmed response was preferable.

Dispatch and Communication

Alternative response programs must work closely with traditional response programs to ensure that City protocols are seamless. LA's 9-1-1 operators currently manage an extremely high call volume and oversee the creation of dispatch protocols of each call. The process of 9-1-1 call triaging — in-depth assessment of calls received via emergency and non-emergency lines, and then transferring calls of service to partner agencies or deploying specific resources — is a crucial and complex component of alternative response. Cities across the country are working on ways to integrate new unarmed response programs into traditional 9-1-1 calls and service dispatch. Depending on the program, unarmed response programs are dispatched directly from 9-1-1 call centers (either housed in a police or fire department or other public safety organization) or transferred to an unarmed response dispatch program.

In Dayton, Ohio, emergency and non-emergency lines operators directly connect callers to Mediation Response Unit (MRU) dispatchers who then deploy unarmed personnel to the scene or assist callers over the phone. In addition, Dayton's MRU has the capability to talk directly with police dispatchers and field units over the radio, allowing for more direct communication between all entities.

An Office of Unarmed Response and Safety could partner with LAPD Communications Division developing, implementing and continuously updating new optimized 9-1-1 decision trees and dispatch protocols.

Additionally, an Office of Unarmed Response and Safety could have their own supplementary

unarmed response dispatch system, similar to LAFD Metro Dispatch to reduce the burden on 9-1-1 operators by taking on some elements of the triage and dispatching process. This would also allow the City to have one body which has the ultimate responsibility for identifying the appropriate department, contractor or partner agencies for calls under the purview of unarmed response. This would also streamline operations as 9-1-1 operators currently must determine if calls are eligible for one of the current unarmed response pilots which may become burdensome if the number of programs and types of response expand.

It is important to note that dispatch systems are significant technological systems which require dedicated staffing, facilities and equipment; further analysis is required to determine costs and feasibility.

Workforce Development, Training, and Staffing

This Office's investigation into the unarmed crisis response practices of other jurisdictions, revealed that the recruitment, required qualifications, training programs, and resources for field staff were a necessary consideration for all unarmed response programs researched. Regardless of the services provided, targeted populations, or other questions of the scope of the program, while details varied, at a minimum, all programs had a formal staff training process.

Workforce and Network of Service Providers

Hiring qualified staff for unarmed response programs remains a challenge for these model programs. Some programs that require specific qualifications, such as specific degrees or certifications, face even more recruitment challenges. For example, the City's partnerships with the Los Angeles County Department of Mental Health are heavily impacted by the mental health workforce shortage. Cities that did not require specific degrees also had challenges finding employment candidates who would thrive as unarmed crisis responders. Some solutions include hiring individuals with lived experiences, creating internal career ladders for unarmed response, and working closely with nongovernmental organizations to facilitate these programs.

The Office of Unarmed response could also be used to cultivate community partners and support a pipeline and network for qualified practitioners who could provide unarmed response services, in order to overcome the current sector-wide shortage of health and mental health practitioners.

Training and Safety

In interviews with other agencies with unarmed response programs, this Office enquired about the safety of unarmed responders in the field. Agencies reported that they had not experienced any incidents in which workers had been injured in the field or considered themselves to be in considerably unsafe conditions.

Extensive, multi-week training programs were recommended as the key reason for this success. Other cities' training programs covered the skills needed to provide residents service, and crucially, the skills and knowledge needed to optimize safety for themselves, colleagues and clients. These trainings include situational awareness, de-escalation, and crisis intervention, and protocols on when and how to refer calls for service to an armed response or to a paramedic response. Depending on the scope of an Office of Unarmed Response, training may also include specialized

information for mental health, behavioral, or other types of crisis, including what services may be available for follow-up care following the crisis.

A training academy, ongoing continuing education, and a worker safety program is recommended.

Organizational Structure

Contingent on the determination of the scope of an Office of Unarmed Response and Safety, such an office may be appropriately located within an existing department or as its own department. The decision of organizational location will impact the governance hierarchy, internal work culture, and potentially the public perception of the prospective office.

Considerations for Organizational Structure

Scale of operations

If the office were to act primarily as a subject matter expert, dispatcher and contract administrator, it may best function as an office within an existing department, but if it were to hire a substantial number of employees, in particular for field work, it may be better situated as a standalone department.

Oversight

City leaders may determine that the office's functions fall within the purview of an existing department, whose expertise and functions may be entrusted to continually ensure its effectiveness. However, it may be that city leaders feel they require more direct oversight and accountability to ensure its success, and in this case a standalone department may be more appropriate.

Placement within LAPD or LAFD

As the efforts to develop alternative response programs stem in part from the public's increasing interest in diverting calls from LAPD, placing the office within the police department may result in negative reactions from constituents. However, embedding an office of alternative response within LAPD may lead to a long term organizational shift towards considering unarmed response as a key strategy in their overall 9-1-1 response. The City should ultimately consider which governance structure would build trust most effectively both with the public and among first responders.

Currently LAFD oversees four alternative response programs. These programs focus primarily on diverting medical emergency response focused on transport to emergency rooms to more appropriate service providers. Due to their focus on patient care and medical emergencies, many alternative response programs may not be appropriate for LAFD oversight. Further LAFD patient care requirements may limit how an alternative response program operates. Further analysis of LAFD's potential role in alternative response is needed.

Existing Pilots

Currently, the City of Los Angeles's unarmed response pilots are spread across four city entities: LAPD, LAFD, Mayor's Office, and CAO (see Appendix B). A decision on the creation of the office should take into account whether some or all of these programs will be brought under one organizational structure.

Organizational Structure in Comparator Cities

Unarmed crisis response programs in other cities are typically led out of one of the following: their respective police department, public health department, or by a contracted non-profit or external health agency. Programs housed within existing departments were relatively limited in scope. For example, programs housed with the police department were typically expansions or variations of co-response programs originally developed by the department. Regardless of location, all programs reviewed included deep interagency collaboration with both internal and external partners.

The City of Albuquerque, New Mexico is the only city in our research with a cabinet-level, standalone department – known as the Albuquerque Community Safety Department (ACS) – dedicated to alternative crisis response programs and established as a peer department to the police and fire departments. As such, the ACS is considered the third branch of the city’s emergency responders. This has allowed Albuquerque to sustain and institutionalize unarmed crisis response programs addressing a variety of calls under this department and has helped legitimize these services among the public. In conversation with ACS staff, it was noted that the creation of the new department separate from police and fire allowed for the development of a distinct departmental organizational culture for these teams to operate in as well as ensured the department would withstand political transitions. ACS staff further emphasized the importance of strategic planning; namely the establishment of a clear mission and scope for the department was noted as a critical ingredient for success.

Initial Resources for an Office of Unarmed Response

Personnel

An Office of Unarmed Response and Safety would require both leadership with expertise in unarmed response programs and also key administrative and policy staff to run core operations and develop new and proactive programming to elevate the mission of the Office. The following personnel are recommended for its initial launch:

Table 4: Personnel for an Office of Unarmed Response and Safety (Year 1)

Class Code	Classification	#	Salary	Indirect Costs
TBD	Executive Director ¹⁸	1	\$ 281,337	\$ 113,507
1538-0	Senior Project Coordinator	1	\$ 102,604	\$ 51,201
1537-0	Project Coordinator	1	\$ 86,360	\$ 45,538
9184-0	Management Analyst	1	\$ 92,185	\$ 47,569
1368-0	Senior Administrative Clerk	1	\$ 61,867	\$ 37,000
1779-1	Data Analyst I	1	\$ 95,046	\$ 48,566
	TOTAL	6	\$ 719,399	\$ 343,380

All salary estimates are for twelve months of funding. Further analysis is needed once decisions are made on the scale of operations, as more staff may be needed as the number of contracts

¹⁸ This salary is an estimate, pending the creation of a new Executive Director classification for such an Office.

increases, and as policy oversight expands. If the decision is to create a standalone department, then additional administrative staff would likely be needed.

Facilities

The Office would likely require new facilities, unless housed within another department which had existing capacity for these staff. Based on an analysis of space standards, at least 200 sq. ft. of space may be required for each staff member. A recently renovated space for a new department cost approximately \$500 per square foot which included tenant improvements, moving, and ITA communication services costs. This puts a minimum facilities cost for a new team of this size at roughly \$600,000.

Next Steps on an Office of Unarmed Response

City leaders will need to determine if an Office of Unarmed Response should be created before the adoption of the City's alternative response framework. The office could support the development of the framework and the implementation of the pending Unarmed Model of Crisis Response one-year pilot (C.F. 20-0769). City leaders may also choose to give this authority to an existing office and create the Office subsequent to the adoption of the City's alternative response framework.

Currently, the City Council appropriated \$1,000,000 in Fund No. 100, Department No. 56, entitled *Office of Unarmed Response and Safety*. This money could be allocated to a current City Department or be used to create a new Department to house an Office of Unarmed Response and Safety.

The CAO will work with relevant partners to:

- Analyze LAPD, LAFD, and current contracted service providers' dispatch and call center systems to provide cost estimates for a dispatch system function within the Office of Unarmed Response and Safety.
- Conduct research on how existing city unarmed response programs ensure safety for their personnel and if any safety issues have arisen.

PRELIMINARY MULTI-YEAR PLAN

Plan for Expansion of Pilot Programs

Per Council File 22-0979 this section discusses the request to develop a plan to expand existing pilots to 24/7 Citywide coverage, and includes a draft year by year expansion plan, as well as best practices and considerations for the effective expansion of such programs.

Best Practices for Expansion

Representatives from other cities' alternative response programs recommended that new alternative response programs begin with a small number of call types and increase the scope of services provided over time. The types of calls which other cities responded to were identified as appropriate for unarmed response teams based on each jurisdiction's efforts to analyze three primary groups of information/data: 1) analysis of 9-1-1 calls for service data, 2) feedback through deep collaboration with their respective first responders, and 3) meaningful engagement with local

stakeholders, including community-based organizations and service providers. It is recommended that any program expansion is based on a similar analysis.

Los Angeles has a uniquely large geographic footprint, such that ensuring response times are within acceptable timeframes and are equitable across the city will require planning. This may include identifying key regions for initial programming and expansion based on need, and identifying facilities or contracted partners in various regions from which teams may be dispatched.

Data Informed Expansion

Data on program performance, and community need and information from partners on best practices could determine which services could be expanded, and in which order. Expansion of services can be prioritized by incident types, shift times, or geographic areas.

For example, Table 5 summarizes the total number of OIS incidents from 2018 to 2022 in each LAPD Bureau. This type of high-level analysis may provide insights into the populations and areas of the City which can be prioritized when planning program expansion.

Table 5. Total number of OIS incidents from 2018 to 2022 in each LAPD Bureau

LAPD Bureau	OIS Incidents 2018-2022 ¹⁹
Central Bureau	52
South Bureau	40
Valley Bureau	36
West Bureau	19

Proposed Timeline

While there are pending decisions on the mission and purview of an Office of Unarmed Response and Safety, it is difficult to provide a definite timeline and next steps. A proposed timeline and an analysis of the considerations which may need to be made to expand services are provided below:

Year 0 (FY 2023-2024) – Interim Steps

The City should take the following actions within the next fiscal year to develop a framework of alternative response and to expand current unarmed response pilots.

- Develop the City’s alternative response framework that includes key policy decisions about the purview and governance of an Office of Unarmed Response and Safety. This includes the following:
 - Incorporate results and feedback from the Mayor’s Office regarding citywide community engagement and outreach efforts;
 - Incorporate best practices research from city and national programs
 - Further analysis of calls for service to determine which are appropriate for an armed response, unarmed response, or co-response;
 - Analyze gaps of service and opportunities for improvement within existing alternative response programs

¹⁹ Los Angeles Police Department (2023). *Use of Force Year-end Review 2022*.

- Provide more accurate cost estimates for implementing the City's alternative response framework
- Pending council approval, execute the necessary contracts to implement the Unarmed Model of Crisis Response one-year pilot (C.F. 20-0769);
 - Create a robust monitoring, performance management and evaluation process to gather key insights that inform the City's alternative response framework and long-term unarmed response program expansion.

Year 1 (FY 2024-2025) – Establish an Office of Unarmed Response and Safety

Following the City's adaptation of an Alternative Response Framework, including decisions regarding the purview and governance of an Office of Unarmed Response, this Office recommends the following administrative steps:

- Recruit and hire leadership with the necessary expertise and credentials
- Hire key administrative staff to support the Office's operations
- Consolidate any contracts that should fall under the Office's oversight.
- Create a strategy for citywide expansion of unarmed response.
 - Determine expansion and consolidation plans for existing programs
 - Design new programs if necessary (e.g. conflict resolution)
- Conduct cost benefit analysis for contracting unarmed response services compared to creating a new unarmed response City field operation.
- Continue stakeholder engagement to:
 - Connect with Angelenos to build trust in the new organization
 - Work with community groups to build trust and a network of potential partners and providers for expanded scope of services
 - Work with workforce experts to develop a pipeline of qualified candidates to grow service provision ability

Note that these steps will take substantial efforts and may take more than one year to complete.

Years 2-5 (FY 2025-2026- FY 2028-2029) – Continued Development and Expansion

Once established, an Office of Unarmed Response and Safety should continue with planning efforts from the previous year and begin expanding existing services or piloting new services year by year until 24/7 citywide coverage is achieved.

Considerations for Expansion of Existing City Programs

Each existing unarmed response program has its own characteristics, and is in a different stage of implementation. When determining how and if to expand these programs, these are some of the issues which may be considered.

Call Direction to Ensure Suicide Safety (CRESS)

The CRESS pilot in collaboration with Didi Hirsch already operates citywide on a 24/7 basis. In order to support this program's success, the City could collaborate with Didi Hirsch to learn about their successes; monitor and evaluate performance measures; and set goals around response times. Additionally, increasing coordination between Didi Hirsch and other agencies may allow for

Didi Hirsch to successfully respond to more 9-1-1 calls and connect more effectively with mobile response teams such as the LAFD Therapeutic Van units, for mental health calls that may require an in-person response.

Crisis and Incident Response through Community-led Engagement (CIRCLE)

The CIRCLE program, led out of the Mayor's Office, operates regionally (see Appendix C for service areas) on a 24/7 basis. It is focused on responding to non-emergency calls related to persons experiencing homelessness (PEH), including wellness checks, indecent exposure, loitering, and noise complaints. The Mayor's Office led the regional expansion thus far by determining regional needs for service. The Mayor would continue to lead further efforts to expand service and optimize operations.

LAFD Programs – Therapeutic Van Pilot, Advanced Provider Response Unit (APRU), Sobriety Emergency Response (SOBER) Unit, and Fast Response Vehicles (FRVs)

LAFD has four alternative response programs which are all currently staffed in the department's deployment model except for the therapeutic vans. Each of these specialized resources serve specific Battalions during their hours of operation²⁰ but may be called to others at the discretion of Incident Commanders. These programs are significantly impacted by mental health worker shortages and overall health care worker shortages, and may be unable to expand further without intervention in this area.

The CLA, in partnership with LAFD and this Office, has been instructed to consider how all four LAFD specialized crisis response programs (incl. Therapeutic Van Program, Advanced Provider Response Unit, SOBER, and Fast Response Vehicles) may be consolidated into one program and expanded citywide (C.F. 20-0769-S5). This report will be useful to inform the development of any recommendations on expansion.

Unarmed Model of Crisis Response Pilot (C.F. 20-0769)

Pending Council approval, it is anticipated that this pilot program would run for one year in order to identify strengths, weaknesses, best practices and program metrics, to effectively determine the scalability to expand the program citywide, should it be deemed as successful. Prospective vendors were asked, amongst other things, to present a proposal for the scalability of the program to possibly expand to provide the full scope of desired services and a discussion of how services could be provided citywide after the pilot program period has ended. A review of these proposed plans, and the performance of the pilot program will facilitate a better understanding of the overall scope, needs and outcomes of a full service program.

Conflict Resolution Program

If the City considers launching a conflict resolution program, it could begin by launching a pilot program using 9-1-1 data and best practices from other jurisdictions to determine key call types to redirect to the pilot program and which call types may be expanded to in subsequent expansions. The City should also consider ways to expand or utilize learnings from both the City Attorney's Dispute Resolution Program and from GRYD – part of GRYD's work includes conflict resolution,

²⁰ See Appendices B and C for additional information.

often in high stakes situations involving gang associations. Additionally, the pilot’s service area could be selected based on which communities have the highest number of these call types, or which communities experience higher rates of any negative outcomes that the program may seek to address.

Estimate of Budgetary Resources Required

Service Expansion

Once the City has defined its scope for the provision of alternative response services, further analysis will be necessary to determine costs of providing these services, Table 6 provides information on the cost of existing pilots for reference.

Table 6. Annual costs of existing City of Los Angeles unarmed response programs

Name	Lead	Supporting	Annual Budget
Crisis Incident Response and Community-led Engagement (CIRCLE)	Mayor’s Office	Urban Alchemy	\$2,600,000
Call Direction to Ensure Suicide Safety (CRESS)	LAPD	Didi Hirsch	\$960,000
Therapeutic Van Pilot	LAFD	LA County DMH	\$2,000,000
Advanced Provider Response Unit (APRU)	LAFD	-	\$3,500,000
Fast Response Vehicle	LAFD	-	\$383,000
Sobriety Emergency Response (SOBER) Unit	LAFD	Exodus Recovery	\$697,000
Unarmed Model of Crisis Response Pilot	CAO	<i>Various - pending Council approval</i>	\$10,405,461
Total			\$20,545,461

After an initial report back on the scale of calls that may need to be considered for an alternative response program, the CAO will use this list as the basis for determining potential costs of 24/7 citywide service.

Costs will depend on whether the work is contracted or brought under City employment, and is likely to be higher if brought under the City’s purview. Costs will also depend on the method and speed of expansion which is preferred by city leaders.

Additional Cost Factors for In House Staff

If it is determined that field positions should be brought under city employment, there will be various additional costs and administrative steps to consider, including:

- The creation of new job classifications, including examinations and job requirements

- Further consideration of civil service hiring processes that may limit candidates' success who possess relevant lived experience related to mental health, substance abuse, homelessness, or other types of services under this program
- Higher salaries and related human resources costs
- Uniforms, personal protective equipment and other supplies
- Capital costs including vehicles and office space
- Liabilities

Next Steps for a Multi-Year Plan

Once more information on a citywide alternative response program scope is available, the CAO will work with relevant partners to:

- Provide updates on estimated costs of the City's alternative response program
- Provide updates on a year by year expansion recommendation

FISCAL IMPACT

There is no impact to the General Fund at this time. The \$1,000,000 in Fund No. 100, Department No. 56, entitled *Office of Unarmed Response and Safety*, is sufficient for the first year of operation at the proposed staffing level for an Office of Unarmed Response and Safety. Additional funds may be required after year one to cover 12 months funding for the proposed staffing level, and pending the adoption of an alternative response framework to implement an unarmed response expansion plan. Without additional funding sources, the creation of an Office of Unarmed Response and Safety and expansion of unarmed response programs will likely have a significant General Fund impact. At this time, the CAO is working with the CLA to determine alternative funding sources for the programs described in this report, including Medicare and other grant programs.

MWS:MCB:AEH:HMR:SG:EG:EIZ:17230002

Appendices

- A. 9-1-1 Calls for Service Dispatch and Diversion Research
- B. Alternative Response and Community Safety Programs in the City of Los Angeles
- C. Current Unarmed Crisis Response Programs Service Area Boundaries
- D. Alternative and Unarmed Crisis Response Pilot Programs in the United States

9-1-1 Calls for Service Dispatch and Diversion Research

Understanding the 9-1-1 Dispatching Process

Individuals in crisis or requiring emergency services can call 9-1-1; they are then directed to their local Public Safety Answering Point (PSAP). For the City of Los Angeles, there are two PSAPs which are located within LAPD's Communications Division. Police Service Representatives (PSRs) are the call-takers and dispatchers that staff the center and triage the thousands of 9-1-1 calls for service (CFS) received on a daily basis. Based on the information provided by the caller, PSRs will either dispatch police, transfer to the appropriate internal or external agency including the Los Angeles Fire Department (LAFD), or provide the caller with resources. In order to determine the appropriate response, PSRs ask callers a series of questions in order to designate calls into specific incident types, and further characterize these incidents into three priorities: Priority III (i.e. routine calls for service that have not been described by the caller as life-threatening or urgent in nature), Priority II calls (i.e. calls that are urgent in nature, but are not life-threatening), and Priority I calls (i.e. emergency calls that may be the result of a life-threatening situation). The role of the PSRs in efficiently and effectively discerning the nature of 9-1-1 calls for service cannot be underscored enough as they are the first line of response in emergency situations.

Incident types are categories of calls that begin with an identifying three-digit number (e.g., "918" for mental illness), followed by additional characters or numbers to create subtypes within that broader category. These subtypes reflect either the nature or current state of the call and serve to inform the dispatched officer whether the incident in question has just occurred, if a citizen is holding the suspect, if a juvenile is involved, etc. For example, the incident code 918PJ indicates that the call for service is related to a possible juvenile experiencing a mental illness. Numerous incident types may fall into the broader categories identified by City leaders as priority areas for call diversion, such as calls related to People Experiencing Homelessness (PEH), mental and behavioral health crises, and conflict resolution. Because incident types provide some level of detail that allow for an assessment of whether an unarmed response may be appropriate, these types are the basis for much of the research into appropriate calls for diversion, including this Office's analysis of CFS data. Nevertheless, it is important to recognize that details and call characteristics not captured by the incident type (e.g. call priority, additional information added to the comments by the dispatcher) must also be considered when determining appropriateness of calls for diversion to unarmed response personnel.

Analysis of 9-1-1 Calls for Service Data (2018-2022)

This Office conducted an exploratory analysis of all Calls for Service (CFS) data from January 2018 through March 2023 to identify overall trends and to gain preliminary insights that may support the development of a framework for an Office of Unarmed Response and Safety. This data includes all calls that were recorded as ‘incidents’ within the LAPD Communications Division. This analysis does not include the following:

- Callers transferred to external agencies (such as the Los Angeles County Sheriff’s Department)
- Callers transferred to the LAFD when the caller is only reporting a medical emergency
- Incidents created for tracking and documentation purposes only (e.g., calls diverted to Urban Alchemy and Didi Hirsch where no police was dispatched)
- Incidents created for documenting ‘information only’ broadcasts (i.e., calls that do not meet criteria for police dispatch but are broadcasted for officers in the area)
- When callers were only provided referrals or resources without dispatching emergency services

In addition to overall call volume analysis, an additional analysis was conducted to estimate the number of Priority III incident types likely to fall under the areas of work which have been commonly discussed as priorities for expanding city unarmed response programs. This included calls relating to people experiencing homelessness, mental health, conflict resolution and welfare checks, substance abuse, and minor disturbances. Below are the incident types included in these categories used to estimate call volume of potential diversion.

Category	Incident Types Included
Minor Disturbance	<i>Minor Disturbance</i>
	507A Auto Repair
	507B BB Gun
	507C Construction
	507F Fireworks
	507G Ballgame
	507O Other
	507P Party

	507R	Radio	
	507V	Vehicle Alarm	
Substance Abuse	<i>Narcotics</i>		
	1101	Narcotics Activity	
	1101Q	Narcotics Activity on a Bus	
	1101U	Narcotics Activity in an Underground Railroad	
	110P1	Possible Narcotics Activity	
	110PS	Possible Narcotics Suspect	
	110S	Narcotics Suspect	
	<i>Intoxication</i>		
	390G	Group	
	390GV	Group in Vehicle	
	390M	Man	
	390MD	Man Down	
	390MV	Man in a Vehicle	
	390MW	Man and Woman	
	390OM	Man, Officer Holding	
	390OW	Woman	
	390WD	Woman Down	
	390WV	Woman in a Vehicle	
	9072	Overdose	
	<i>Injury</i>		
	907A2	Ambulance Overdose	
	907P2	Possible Overdose	
	907PA2	Possible Ambulance Overdose	
	Conflict Resolution and Welfare Check	<i>Dispute</i>	
		6201	Roommate Dispute

	620B Business Dispute
	620L Landlord/ Tenant Dispute
	620N Neighbor Dispute
	620O Other Dispute
	<i>Welfare Check</i>
	820W Welfare Check
Mental Health	<i>Injury</i>
	9073 Attempt Suicide
	907A3 Ambulance Attempt Suicide
	907P3 Possible Attempt Suicide
	907PA3 Possible Ambulance Attempt Suicide
	<i>Mental Illness</i>
	918AF Ambulance Female
	918AJ Ambulance Juvenile
	918AM Ambulance Male
	918F Female
	918J Juvenile
	918M Male
	918MF Male/Female
	918PF Possible Female
	918PJ Possible Juvenile
918PM Possible Male	
Homelessness-related	<i>Incidents included were those that were tagged as involving a person experiencing homelessness by PSRs</i>

Review of Efforts to Identify Calls Appropriate for Unarmed Response

This Office reviewed efforts to date to identify calls for service appropriate for diversion from traditional law enforcement. This included research conducted by the Los Angeles Police Department (LAPD) to develop an unarmed model of crisis response to divert non-violent calls for service away from the LAPD (C.F. 20-0769-S3). As part of this

research, the department identified three broad categories for which non-violent calls could be diverted to unarmed responders. The three categories include:

- Welfare checks, which may include both in-person home visits (e.g., when an out-of-town relative is concerned about an individual’s well-being due to the latter’s non-responsiveness) or on-the-street assessments (e.g., for a person experiencing homelessness or appearing in distress in public);
- Public intoxication or overdose; and
- Minor disputes, such as those between neighbors, landlords and tenants, roommates, or other individuals.

The LAPD examined the third category of disputes more closely in a report back to the Ad Hoc Committee on Police Reform in December 2020 (C.F. 21-0019). The LAPD reported that in 2019, the department responded to 979,267 calls, of which 78,693 (8%) were categorized as “disputes”. Within the dispute category, the breakdown by incident type is shown in Table 1.

Table 1: Total Dispatched Calls Categorized as “Disputes” in 2019

Incident Type	Total Calls	% of Dispute Calls	% of Total Calls
Dispute - Family	15,704	20%	1.6%
Dispute - Man / Woman	14,839	18.9%	1.5%
Dispute - Domestic Violence	13,217	16.8%	1.3%
Dispute - Neighbor	12,075	15.3%	1.2%
Dispute - Business	11,707	14.9%	1.2%
Dispute - Landlord / Tenant	7,352	9.3%	0.8%
Dispute - Roommate	3,709	4.7%	0.4%
Dispute - Miscellaneous	90	0.1%	0.0%

The LAPD recommended that it continue to respond to the family, man/ woman, and domestic violence dispute calls due to the elevated potential for violence escalating in these situations. However, the dispute calls related to neighbor, business, landlord/ tenant, and roommate disputes were noted by the department as appropriate for an unarmed response by another entity. The department stated that diverting these calls would represent 28.9% of dispute calls responded to by the LAPD in 2019.

In March 2023, the Los Angeles Police Protective League (LAPPL) released an initial list of categories of calls for service that the union identified as potential calls for an unarmed responder to be initially dispatched to rather than a sworn police officer. The list included:

- Non-criminal, non-violent and quality of life calls involving persons experiencing homelessness
- Non-criminal mental health related calls
- Non-violent disturbances involving juveniles excluding mandatory reporting notifications
- Public health order violations
- Non-violent calls for service at City parks
- Individuals engaged in alcohol or substance use, including public intoxication, where no other crime is present
- Welfare checks including courtesy requests from medical professionals or hospitals
- Non-fatal vehicle collisions excluding those involving criminal offenses (e.g., verbal disputes at the scene of a traffic collision, parties refusing to exchange information, property damage only collisions involving personal and City property)
- Parking violations including vehicles blocking driveways
- Abandoned vehicles
- Illegal dumping
- Complaints of vicious and dangerous dogs excluding attacks in progress
- Anonymous noise complaints involving loud parties and disruptive music
- Disputes involving landlord, tenants and roommates
- Loitering and trespassing calls with no indication of danger
- Alarm calls at residences and businesses excluding panic, duress or silent alarms
- Syringe disposal
- Request from Department of Transportation (DOT) for police officers to stand by at the scene
- Homeless encampment clean ups excluding pre-scheduled requests
- Panhandling
- Illegal vending
- Illegal gambling
- Fireworks
- Defecating and urinating in public
- Death from natural causes or no indication of foul play

A high-level review of these calls indicate that they broadly fall into the following categories: 1) calls potentially related to PEH; 2) welfare checks; 3) substance abuse; 4) mental / behavioral health; 5) conflict resolution; and 6) enforcement, including code enforcement and illegal dumping. The City's current unarmed response pilots cover many of the categories identified by the LAPPL. The two call categories that are not currently addressed by an existing pilot are conflict resolution and enforcement.

Program	Lead	Support	Types of Calls	Areas Served	Hours a day/ Days per week
Unarmed Crisis Response					
Crisis and Incident Response through Community-led Engagement (CIRCLE)	Mayor's Office	Urban Alchemy	Persons Experiencing Homelessness	Hollywood, Venice, Downtown LA, Lincoln Heights, San Fernando Valley, South LA	24 hrs/ 7 days
Call Direction to Ensure Suicide Safety (CRESS)*	LAPD	Didi Hirsch	Suicidal crisis, emotional distress	Citywide (only telephonic services)	24 hrs/ 7 days
Advanced Provider Response Unit (APRU)*	LAFD	-	Non-critical, low-acuity calls, and chronic users of emergency services	LAFD Bureaus: West, Valley, South	10 hrs/ 4 days
Fast Response Vehicles (FRVs)*	LAFD	-	Intervention and triage for acute emergencies, alcohol inebriation and mental health crisis	LAFD Bureaus: Central, West, Valley, South	10 hrs/ 4 days
Sobriety Emergency Response (SOBER) Unit*	LAFD	Exodus Recovery	Alcohol inebriation	Skid Row Community**	10 hrs/ 3 days
Therapeutic Van	LAFD	LA County DMH	Non-violent, mental health crisis	LAFD Bureaus: Central, West, Valley, South	24 hrs/ 7 days***
Unarmed Model of Crisis Response Pilot (C.F. 20-0769)****	CAO	PennyLane	Psychological crisis including substance abuse and suicidal threats	LAPD Divisions: Devonshire, Mission, Van Nuys, North Hollywood	9 hrs/ 7 days
Unarmed Model of Crisis Response Pilot (C.F. 20-0769)****	CAO	Exodus Recovery, Inc.	Welfare checks, alcohol inebriation, conflict resolution, persons experiencing homelessness, suicidal crisis, mental health	LAPD Divisions: Southeast, Hollenbeck, Pacific, West LA, Newton, Northeast, Rampart	24 hrs/ 7 days
Unarmed Model of Crisis Response Pilot (C.F. 20-0769)****	CAO	Alcott Center	Welfare checks, conflict resolution, suicidal crisis, crisis counseling, substance abuse, domestic violence	LAPD Division: West LA	10.5 hrs/ 7 days

* Pilot initially funded by the Innovation and Performance Commission's Innovation Fund

** Due to Exodus staffing issues SOBER Unit currently operates as an FRV

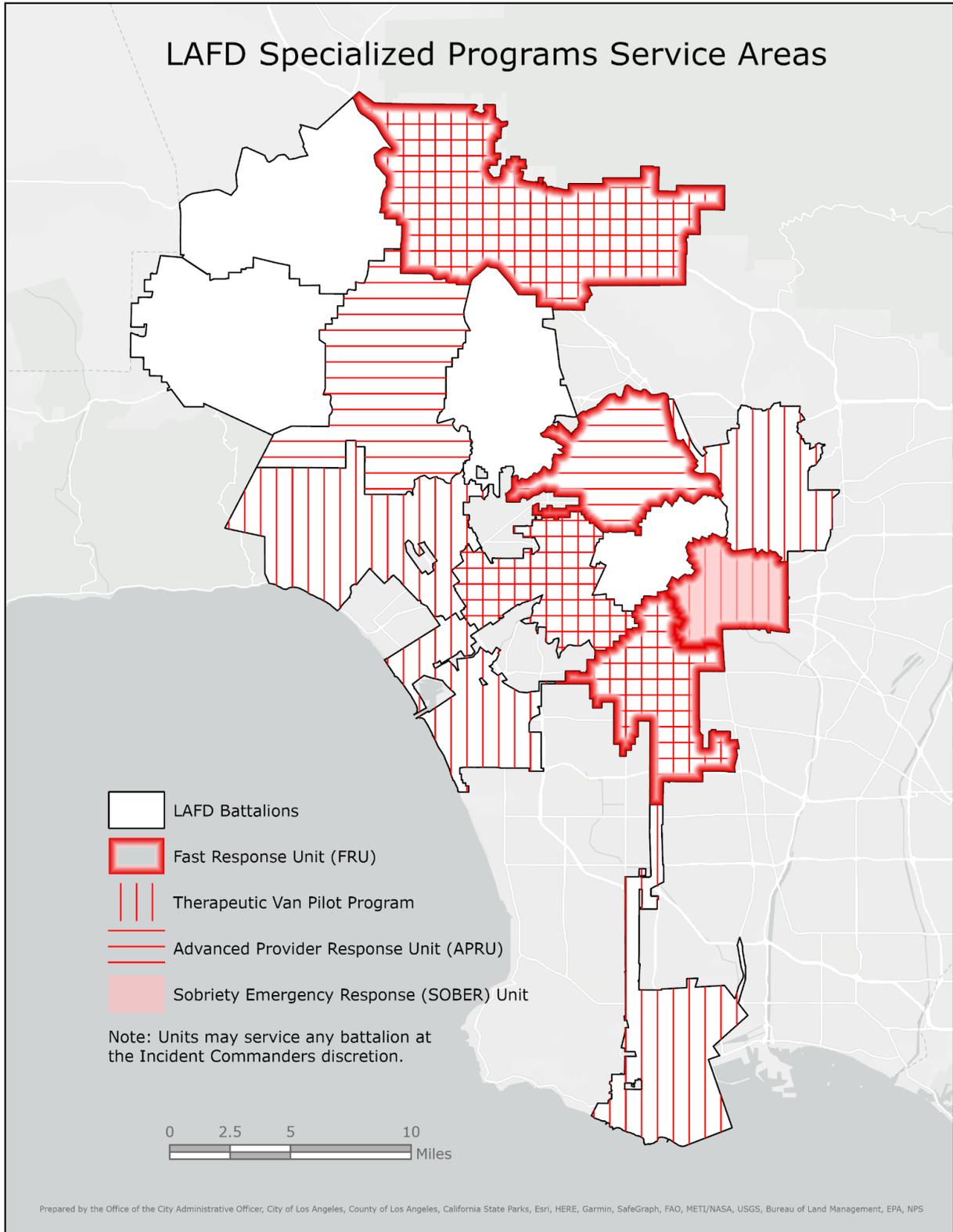
*** Excluding County holidays

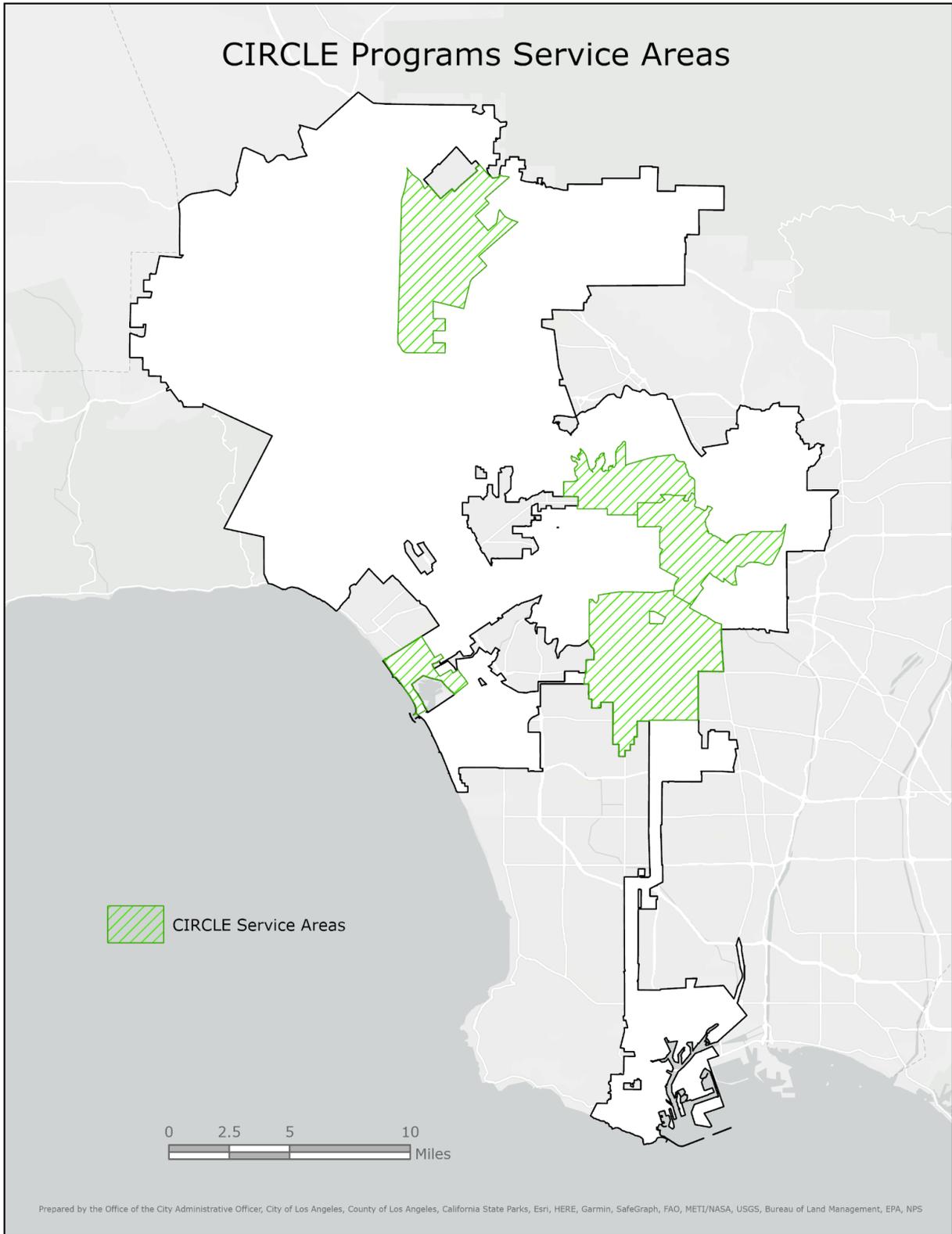
**** Pending final Council approval and contract execution

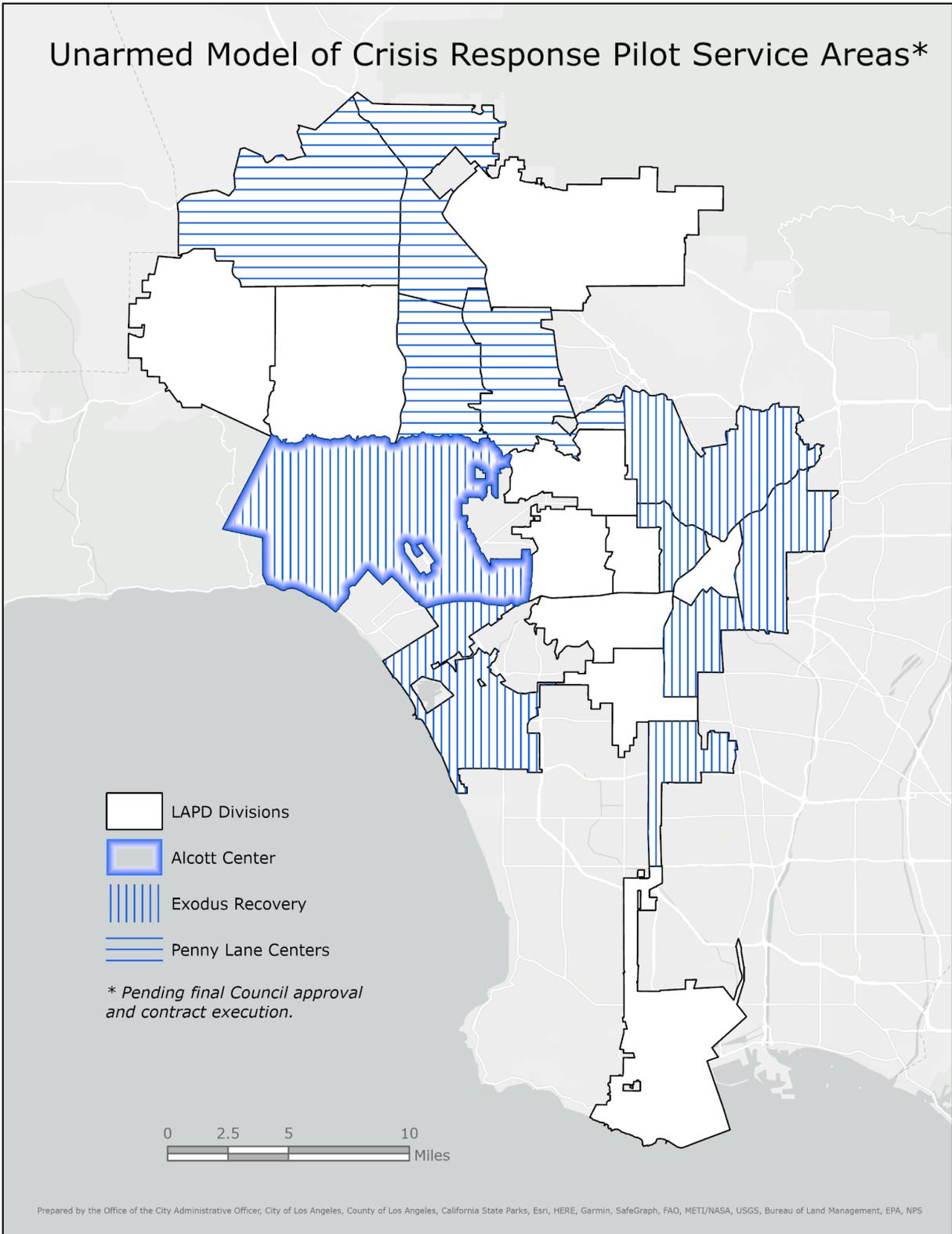
Program	Lead	Support	Types of Calls	Areas Served	Hours a day/ Days per week
Co-Response					
Systemwide Mental Assessment Response Team (SMART) / Case Assessment Management Program (CAMP)	LAPD	LA County DMH	Mental health crisis	Citywide	24 hrs/7 days
Domestic Abuse Response Team (DART)	LAPD	social service providers	On-scene and follow-up crisis intervention for victims of domestic violence	Citywide	24 hrs/7 days
Crisis Response Team (CRT)	Mayor's Office	LAPD / other service providers	On-scene and referrals for crisis intervention for victims involved in a traumatic incident	Citywide	24 hrs/7 days
Community Safety Programs					
Program	Lead	Support	Types of Services Provided	Areas Served	Hours a day/ Days per week
Gang Reduction and Youth Development (GRYD) Program	Mayor's Office	social service providers	Provides community engagement and programming, gang prevention and diversion services for youth and families, intervention and violence interruption services	23 GRYD Zones in the city	24 hrs/7 days for violence interruption services
Neighborhood Justice Program (NJP)*	City Attorney	volunteer panelists	Diversion program in which certain first-time and other eligible offenders, are given an opportunity to resolve their case and repair the harm they caused through a community-based process, instead of in a courtroom	Citywide	Mon-Fri: 8am-5pm and some evening and weekends by appointment
Dispute Resolution Program (DRP)	City Attorney	mediation volunteers	Provides free voluntary, confidential conflict resolution services for community disputes including: landlord-tenant, neighbor-neighbor, business-customer, and family-domestic; Provides community-police mediation to address complaints of police discourtesy and bias	Citywide	Mon-Fri: 8am-5pm and some evening and weekends by appointment

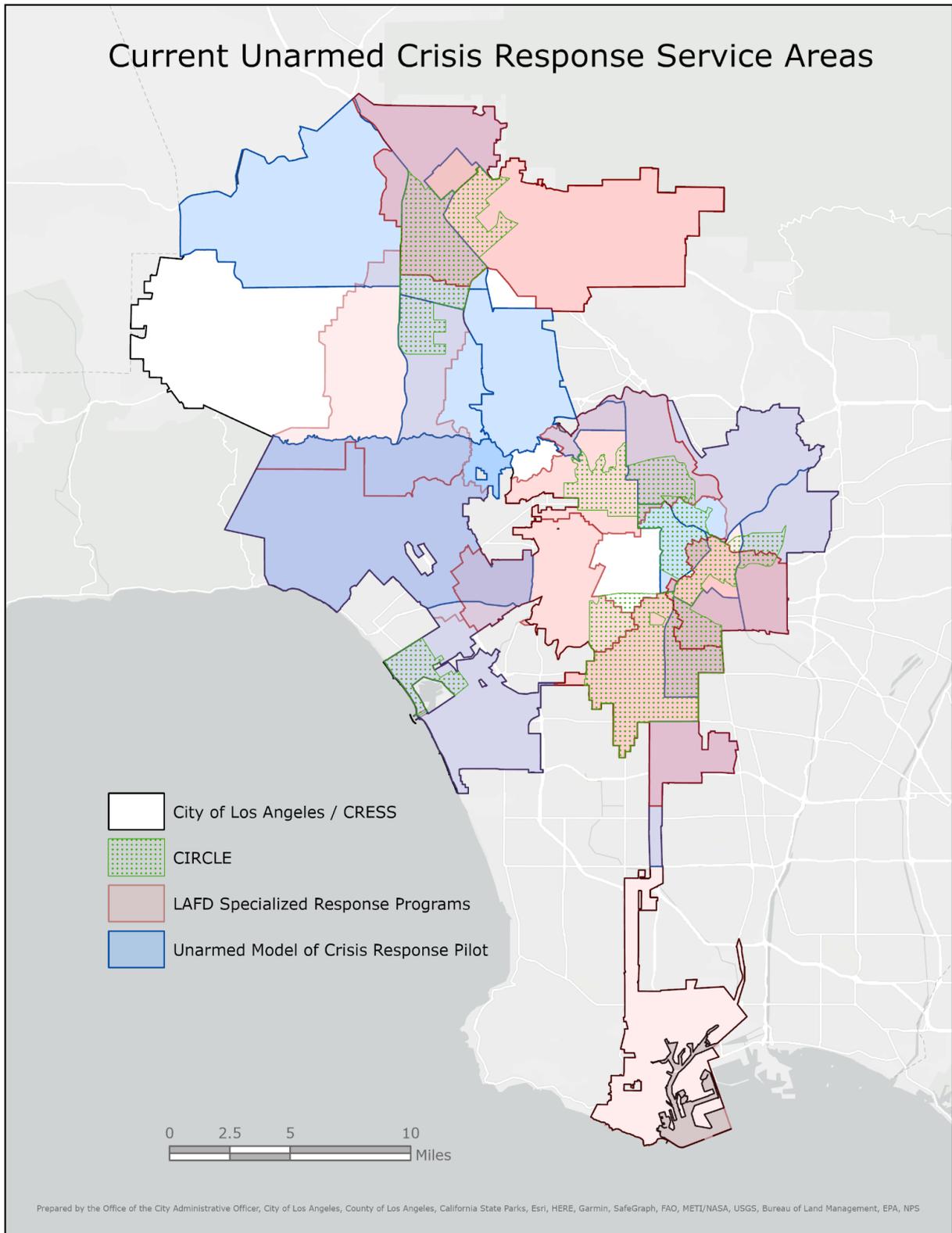
* Pilot initially funded by the Innovation and Performance Commission's Innovation Fund

Current Unarmed Crisis Response Programs Service Area Boundaries









Alternative and Unarmed Crisis Response Pilot Programs in the United States

Appendix D

To develop this report, the Office of the City Administrative Officer conducted interviews with practitioners in the cities of Denver, CO, Dayton, OH, and Albuquerque, NM (corresponding program names **bolded** in the chart). These interviews supplemented the existing research on other city pilots laid out in the Chief Legislative Analyst’s report back to Council File 20-0769. The chart below outlines key information from other programs in the country.

Program	City	Agencies/ Organizations	Types of Calls	Composition of Response Teams	Hours a day/ Days per week
Crisis Assistance Helping Out On The Streets (CAHOOTS)***	Eugene, OR	Eugene Police Department, White Bird Clinic	Welfare checks, intoxication, suicide, conflict resolution, counseling and mediation, housing and transport requests	One medical professional (nurse or EMT) and one mental health crisis worker; deployed in pairs	24 hours/7 days
Expanded Mobile Crisis Outreach Team (EMCOT)	Austin, TX	Integral Health (County-level), Austin-Travis County Emergency Medical Services, Austin PD, Travis County Sheriff’s Officer	Welfare checks, suicide, parent-child conflicts, individuals experiencing psychosis, paranoia or delusion	One mental health clinician; co-responds with law enforcement	10-16 hours/7 days*
Crisis Response Unit (CRU)	Olympia, WA	Olympia Police Department	Crisis counseling, conflict resolution and mediation, harm reduction, and non-emergency medical calls	One crisis response specialist and/or one crisis response lead worker; deployed in pairs	24 hours/7 days
Denver Support Team Assisted Response (STAR)***	Denver, CO	Denver Dept of Public Health & Environment, Denver Department of Safety	Persons experiencing homelessness and mental health crisis	One behavioral health clinician and one Denver Health paramedic or EMT, deployed in pairs	8 hours/5 days
San Francisco Street Crisis Response Team (SCRT)	San Francisco, CA	San Francisco Dept of Health, San Francisco Fire Department, Dept of Emergency Management and other external health services organizations	Low priority behavioral health crisis	One San Francisco Fire Department community paramedic, one mental health clinician, and one peer counselor; deployed in teams of three	24 hours/7 days
Albuquerque Community Safety Department (ACS)***	Albuquerque, NM	Albuquerque Community Safety Department**	Mental health, substance abuse, intoxication, public disturbances, suicide and homelessness	One Mobile Crisis Team co-responds with law enforcement; Behavioral Health Responders deployed in pairs; Street Outreach and Community Responders	24 hours/7 days

Alternative and Unarmed Crisis Response Pilot Programs in the United States

Appendix D

Program	City	Agencies/ Organizations	Types of Calls	Composition of Response Teams	Hours a day/ Days per week
Policing Alternatives & Diversion Initiative	Atlanta, GA	Policing Alternatives & Diversion Initiative (non-profit), Atlanta Police Department, Georgia Tech Police and Metropolitan Atlanta Rapid Transit Authority	Welfare checks, substance abuse, mental health, public disturbances, indecent exposure and public health	Harm Reduction responder; deployed in pairs	12 hours/5 days
Behavioral health 911 Diversion Pilot Program	Baltimore, MD	Behavioral Health System Baltimore and Baltimore Crisis Response, Inc.	Mental health, suicide, de-escalation assistance and crisis aid	Mental health professional (psychiatrist, social worker or nurse) and nurses; deployed as stand-alone teams or co-response with fire or police personnel	24 hours/7 days
Behavioral Health Emergency Assistance Response Division (B-HEARD)	New York, NY	Fire Department New York City, New York City Health & Hospitals, New York City Mayor's Office of Community Mental Health	Mental health, suicide, and substance abuse	Two EMT or paramedics and one social worker; deployed in teams of three	16 hours/ 7 days
Portland Street Response (PSR)	Portland, OR	Fire and Rescue Department	Mental health, substance abuse, and public disturbances	One community health medic (EMT), one licensed mental health crisis responder and one peer support specialist; deployed in teams of 2-3	14 hours/7 days
Mediation Response Unit (MRU)	Dayton, OH	Dayton Mediation Center, Regional Dispatch Center, Dayton Police Department and Dayton Fire Department	Welfare checks, noise complaints including parties and barking dogs, loitering, trespassing, disputes involving family members, neighbors and roommates, harassment, and parking complaints	One coordinator and six mediation response specialists; deployed in teams of seven	9 hours/5 days

* EMCOT Clinicians at the Call Center are available 24 hours/7 days a week.

** Albuquerque Community Safety Department is a newly created department.

*** Pilot programs with community oversight.