

## **PPD RESPONSE TO CNA AFTER-ACTION REPORT RECCOMENDATIONS**



### **The PPD as a Learning Organization**

The PPD is a learning organization, and as such, we are dedicated to creating, acquiring, and modifying behaviors to reflect best practices. The CNA report is a step forward in helping us implement policies and practices that reflect the organizational excellence for which we are striving, and that the people who live, work and visit Philadelphia deserve.

We are fully committed to taking the recommendations put forth by the CNA report seriously. As a matter of fact, some of the suggestions in the analysis did not come as a surprise. Because we are an organization that strives for continual improvement, in the days and weeks following the Floyd demonstrations, we actively assessed our responses to the demonstrations and made necessary adjustments based on new intelligence gathered, as well as our experience during these demonstrations. This has remained an ongoing process so many of the recommendations in the CNA report are already actively being implemented.

The mass demonstrations that took place in Philadelphia and across the nation after the death of George Floyd were unprecedented. The findings produced by the CNA report allows us to take a holistic look at our tactics when responding to mass gatherings and gives us an opportunity to implement meaningful changes that will ensure demonstrator, bystander, and officer safety during these events.

### **Budgetary Restrictions**

Some of the recommendations provided in the report would require that our budget increase exponentially. As we know, the city has lost revenue due to the pandemic, and in order to meet some of the recommendations, financial considerations will have to be met. This will require that we come up with creative ways to meet these goals and explore options with or city partners and stakeholders.

### **Validity of the Report**

For their report, CNA used objective, factual, and verifiable data to provide the Philadelphia Police Department with recommendations for improvement. We hold the CNA team in high regard for a fair and balanced review of the events that took place. Some of the recommendations contained within the report are some of the changes that we've implemented as part of the mayor's Pathways to Reform, Transformation, and Reconciliation. The 120-Day update on the pathways to reform was released back in October of this year. These changes include things such as updating our use of force policy to clearly state that kneeling on a person's head or neck is prohibited, the ban of no-knock warrants, implicit bias training, and the Active Bystander for Law Enforcement (ABLE) program. These new policies are just a handful of modifications that were immediately implemented in the wake of national events and applied in Philadelphia as a way to proactively improve our department.

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Planning/ Preparedness	When developing the Operational Order, PPD made inadequate planning assumptions, didn't engage the right planning support, and did not provide for contingencies or scalability.	1. All Operational Orders developed in preparation for mass demonstrations and protests should include staffing contingencies that will allow for a scalable police response with the resources necessary to facilitate lawful protests and voluntary compliance.	PPD accepts this recommendation, as the organization has a long history of handling large scale events successfully. Through the AAR process, PPD made any necessary adjustment to the planning process.
		2. At minimum, the operational order should address: command assignments, assigned personnel, communication protocols internal and external to the department, resource staging points, traffic management, first aid stations, and trigger points for activating a citywide response. These orders should be reviewed by all Deputy Commissioners, and final approval at the discretion of the Police Commissioner or designee.	
	There is no established citywide plan for responding to civil unrest	3. As part of the planned 2020 review of the <i>City of Philadelphia All Hazard Mitigation Plan</i> , the Office of Emergency Management (OEM) in coordination with a multi-disciplinary team of the key stakeholders should develop a civil unrest annex to the City's Emergency Operations Plan (EOP). This plan should clearly identify command roles, individual agency responsibilities, communications protocols, logistical needs, public information strategies	PPD accepts this recommendation and will work jointly with the OEM, and the city's Emergency Operations Plan are not PPD stand-alone documents.
		4. This Citywide Civil Unrest plan should clearly identify command roles, individual agency responsibilities, communications protocols, logistical	

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		needs, and public information strategies and requirements, and establish training and exercise requirements to ensure understanding and compliance.	
	There are no standard operating guidelines or procedures that clearly establish the roles and responsibilities of the UCG	5. The OEM in coordination with PPD and other stakeholders should develop specific guidance for the composition and operations of the UCG including core and expanded membership lists, process for documenting decisions, tracking steps taken, and follow up actions. Having pre-established and standardized operating guides can help to ensure that the UCG has clearly defined operational objectives, and can best leverage the group's knowledge of resources available for the duration of the response. Having a robust UCG representing all applicable city services and functions also helps to ensure that the development of an overall IAP that clearly identifies citywide objectives, and best leverages the full breadth of city agency capabilities available to the response effort.	PPD accepts these recommendations and will work with OEM/UCG on implementation of 5, 6, & 7. The EOC should have recording capabilities, but this will have direct budget implications for this technology.
		6. The UCG should keep formal records of all meetings, and document all efforts taken by this group to manage the response, to include future planning activities.	
		7. Once the UCG standard operating guidance is developed, tabletop exercises with key city leaders should be conducted to ensure understanding	

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		of their roles and responsibilities in driving a unified citywide response effort	
	The PPD staff assigned to the EOC were overwhelmed with resource requests, and at times, did not have the authority to adjudicate competing needs.	8. Additional training on NIMS/ICS, the function of the EOC, and the role of the emergency liaison officer (ELO) should be conducted with PPD personnel. Routine exercises and training would help to ensure that the ELOs assigned to the EOC have clear roles and authority, and that the ICs in the field understand how to best leverage the resource capabilities of the OEM, PEMA, and federal emergency management assets	PPD accepts this recommendation. This will require coordinated training from the Training Bureau, Homeland Security Bureau (Counter Terrorism Unit), and OEM.
		9. The PPD should establish Memorandums of Understanding (MOUs) with other local law enforcement agencies in order to create clear protocols and expectations, and facilitate a more seamless integration to the incident's ICS.	PPD accepts this recommendation and will work jointly with the OEM, since the City's Emergency Operations Plan are not PPD stand-alone documents.
	Citywide emergency preparedness planning, training, and response are additional duties for the Philadelphia Fire Commissioner...	10. Given that the PFD has such a heavy workload, and is often a major partner in response to large-scale events, the overall responsibilities for preparedness and response may be better assigned to a stand-alone OEM structure. This would allow the leadership of primary response agencies such as PFD and PPD to run the operational and tactical incident response, while having the resource support and coordination activities	PPD agrees with this recommendation that the OEM may be better structured as a stand-alone entity, however, the PPD does not have authority to restructure this entity. Nonetheless, PPD will work with City officials to assist in this restructuring, if possible. These changes will have budget implications that need to be further explored.

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		more fully managed by OEM.	
		11. At minimum, the city should consider establishing a requirement that newly elected officials must be briefed on emergency operations plans, and an executive-level tabletop exercise with other agency response principles should be held within 30-days of appointment.	PPD agrees with this recommendation, however, the OEM should take the lead in developing an introductory training curriculum for newly elected officials. PPD is willing to assist in the development of this curriculum and in its presentation to newly elected officials
Command and Control	Despite serving as incident commanders (ICs) for their divisions, Inspectors lacked the necessary authority and support to be most effective in their roles.	12. In circumstances when superiors are unable to respond to requests initiated by the ICs, the ICs should have the authority to take the appropriate actions within their areas of command. It is also recommended that during significant events, an officer with the rank of Chief Inspector or above should be permanently assigned to the EOC for the purpose of fielding and responding to requests from ICs in the field.	PPD accepts this recommendation
		13. In exigent circumstances, the IC, provided that he/she has the rank of Inspector or above, should be authorized to cancel days off and call officers on their days off back to work.	PPD will review this recommendation, but the cancelling of days off requires a citywide coordinated effort and, therefore, must be ordered by no less than a Deputy Commissioner
PFD Command and Control	Despite the requirement to obtain approval from Commissioner Outlaw prior to the use of CS gas, only one of three locations using CS gas obtained approval.	14. As a matter of policy, the Police Commissioner or his/her designee will have the sole authority to approve each instance of CS gas dispersal.	PPD accepts this recommendation and this has already been incorporated into the SWAT SOPs. Nonetheless, PPD will not seek the Police Commissioner's approval for using gas when dealing with hostage or barricade situations. PPD has distinguished as much in the updated SOP

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Command and Control	A number of PPD command staff, spontaneously deployed to various locations, limiting the effectiveness of the overall command structure.	15. All command level personnel, without already established roles, should report to the same designated location. At this location, they should receive instructions from the field commander as to how they will be utilized.	PPD will consider this recommendation, as PPD practice is to issue Operational orders to assign commanders to specific commands and areas. However, during emergencies when orders have not been established, commanders will report to the command post or EOC for instruction.
	Key PPD vacancies led to a fractured chain of command and span of control issues	16. The Chief Inspector of the Homeland Security Bureau and the First Deputy Commissioner positions should be filled immediately. It should be noted that these positions have since been filled. In an instance in which a position of the Inspector rank or above becomes vacant, someone should be appointed to the position in an acting capacity in a timely manner.	The PPD has accepted this recommendation and has staffed these two positions
	As the number of incident sites expanded, the PPD did not employ an area command.	17. In responses involving multiple incident sites, the PPD should consider implementing an area command approach as outlined in NIMS/ICS, who has adequate operational knowledge and the authority to make decisions related to resource management and allocation. This position is distinct from the commanders managing on the ground operations. This position could be appropriately filled by the First Deputy Commissioner.	PPD accepts this recommendation and the First Deputy Commissioner will fill the Area Command position during multiple critical incident
	PPD experienced problems transporting and processing the large	18. Prior to demonstrations that may result in mass arrests, officers should be reminded of the proper arrest	PPD accepts this recommendation, and changes to policy and practice began in June 2020.

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	volume of arrestees during the first few days of the protests	procedures, as indicated in PPD Directive 8.3. This directive specially iterates the importance of having the proper paper work follow each arrestee. It is further recommended that prior to arrestees being transported, a supervisor should ensure that proper paper work has been completed.	
		19. Every protest that has the potential for arrests should have a contingency plan that includes back up processing stations with the appropriate number of EPWs and the necessary equipment to process arrestees in a timely manner.	PPD accepts this recommendation and are working to remedy this situation at each district station as appropriate.
		20. In any public health crisis that requires the wearing of PPE, such as facemasks, PPD personnel should abide by the department's requirements and ensure that the health of civilians and arrestees is properly protected.	PPD accepts this recommendation, but it should be noted that we have a COVID 19 directive in place, issued in March 2020.
Resource Management and Allocation	Inadequate manpower had notable impacts on PPD's ability to effectively make arrests in response to looting and on officer safety.	21. To adequately staff for protests, it is important for PPD to value its internal intelligence and to monitor social media with the understanding that the information is not always accurate.	The PPD accepts recommendations 16, 17, and 18, and began making changes to policy and practice starting in June 2020. Intelligence dictates deployment strategies; however, protesters deliberately hide their intentions to be destructive.
		22. The PPD, under exigent circumstances, should allow Incident Commanders, with the rank of Inspector and above, to authorize the extension of shifts and the cancelling of days off.	Cancelling days off and extending tours usually requires a citywide coordinated effort and therefore is done by a Deputy Commissioner.

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		23. The PPD should explore more effective ways of calling officers back to work under emergency conditions.	Calling back officers will require a Best Practices research
	The PPD's focus of resources on Center City left the remaining area of the city vulnerable to looting and riotous activity.	24. If the general location of a protest or demonstration shifts to another location or spreads to multiple locations, PPD should reallocate its resources appropriately to accommodate these shifts. The PPD should establish a policy that clearly states how resources will be allocated in circumstances in which there are multiple locations of shifting locations.	PPD accepts this recommendation and already has this as a standard operating procedure.
	Poor utilization of the mutual aid coordinator hindered resource identification and allocation.	25. The PPD should create a mutual aid policy. This policy should designate a mutual aid coordinator and clearly state instructions for and expectations of the mutual aid coordinator.	The PPD will consider these recommendations, as the EOC serves as the designated Mutual Aid Coordinator
		26. To avoid confusion and other inefficiencies, the mutual aid coordinator should be the single point of contact for all outside agencies.	
		27. The mutual aid coordinator should be provided with all necessary documents (e.g., list of all outside agencies with relevant information for each agency) and resources to perform the role.	
	Overall, PPD officers were not properly equipped for the violent nature of the demonstrations and civil disturbances that occurred, nor for the dispersal of CS gas.	28. Following training on proper use, every PPD officer should be issued a riot helmet, a gas mask, and goggles or safety glasses. This equipment should be easily accessible for officers, to ensure that they are equipped even on short notice.	PPD will consider these recommendations, but in order to fully implement there are significant budget implications with regard to acquiring gas masks and shields. This process of examination has been ongoing since June 2020



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		29. PPD should obtain a sufficient number of shields for the department. The PPD should strategically place the shields throughout the city where they can be rapidly and easily accessible to the various divisions.	
	As the demonstrations and civil disturbances escalated, many districts ran out of police radios.	30. PPD should issue every officer a police radio.	PPD accepts these recommendation, but recognizes this has significant budget implications not currently contemplated.
	While PPD did include considerations for potential fires, they lacked the equipment to control them when set.	31. The PPD's role in demonstrations and civil disturbances should be clearly stated in the Operational Orders. The possibility for violence should be accounted for in the description of PPD's role and responsibilities. The PPD should ensure that the PPD has the appropriate security while there are addressing their responsibilities in the midst of a civil disturbance.	PPD accepts this recommendation.
		32. A sufficient number of PPD police vehicles should be equipped with a fire extinguisher.	PPD accepts this recommendation. Cost estimate should be researched on fire extinguishers.
	<b>Tactical Response and Use of Force</b>	33. Enhance Training on Protest Interactions and Professional Communications: better promote, and reinforce accountability through training and policy, the importance of officers managing their emotions and aggressions even under the most stressful of circumstances.	PPD accepts this recommendation, but this has budget implications that will need to be considered.
		34. Emphasize that the most critical aspect of de- escalation strategies and minimization of UOF applications starts with the officer's ability to keep their	PPD accepts this recommendation, but this has budget implications that will need to be considered.

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		emotions under control and utilize effectively dialogue with individuals – even with the most volatile and uncooperative of people.	
		35. Best practices promote and train officers to, “not take it personally” when dealing with non-compliant, resistive and aggressive individuals. Training that emphasizes emotional control not only affects the ability to better diffuse volatile situations and minimize UOF but also directly affects officer safety and wellness.	PPD accepts this recommendation.
	Officers inconsistently abided by instructions given in prior trainings regarding appropriate communication and engagement with protestors.	36. The PPD should consider enlisting community activists and protesters and organizers to participate in pre-service and in-Service trainings with the goal of establishing improved understanding of perspectives and goals. The ability to show “empathy,” as noted in PPD’s training lesson plan, requires a mutual understanding of differing perspectives.	PPD accepts this recommendation, as this is a practice that has been underway for many years when planning for large scale events.
		37. Develop a more robust proactive outreach plan with identifiable community leaders, advocates and to improve communications. Some of the goals of the outreach can include: <ul style="list-style-type: none"> <li>a. Relationship building</li> <li>b. Establishing a communication network</li> <li>c. Identify the POC’s for during the event</li> </ul>	PPD accepts this recommendation and policy and practice changes have been ongoing since May 30, 2020.

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		<ul style="list-style-type: none"> <li>d. Shared learning about protesters goals and plan</li> <li>e. Shared learning about police roles and responsibilities, plans, acceptable and unacceptable behaviors, laws and arrest clarifications</li> <li>f. Establish a plan to disseminate information on any agreed upon plans with the protesters and the police</li> <li>g. Establishing post event/ after action meetings</li> </ul>	
		38. Consider establishing a command post/unit (possibly utilizing the CAD) after the events to enhance community outreach. Have available to officers and supply them with cards or fliers that can be provided to protesters during appropriate opportunities and directs them to contact the Center if they have questions, complaints, or information to share. This can be staffed by citizen volunteers if PPD does not have resources such as the CAD available. This can provide PPD with an improved opportunity to demonstrate transparency, community engagement and to clarify information following significant events.	PPD accepts this recommendation. This process is currently being employed by the PPD Community Relations Bureau
	A multitude of factors hindered PPD's ability to effectively control traffic throughout the city.	39. Prioritize the importance of traffic control and develop pre-established operational plans and assignments in anticipation of large scale protests and riots. Identify the	PPD sees traffic as an integral part of all Operational Plans and has historically handled traffic flow without any problems. However, PPD will consider

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		most significant and likely areas that will be targeted and prioritize where control tactics are most critical for community and officer safety. The advanced operational plans should be developed in conjunction with outside agencies who can supplement PPD resources with traffic control.	this recommendation to determine better method to address the scalability of traffic resources to address multiple location-type incidents
	Although less-than-lethal weapons can be effective tools for officers, there were several instances in which PPD officers did not use these weapons appropriately and in accordance with PPD policy.	40. PPD should examine their officer's awareness and understanding of authorized use and applications of the baton and where this falls in their UOF Decision Chart. Furthermore, baton strikes to the head area should be considered deadly force and reflected so in PPD policy.	PPD will consider this recommendation and notes that PPD currently prohibits baton strikes to head
		41. PPD should review and analyze their UOF reports, BWC footage and survey officers to evaluate if their baton applications are appropriate, effective, result in the desired outcomes and/or if additional training and or alternative applications of force would prove more appropriate <i>and</i> effective.	PD accepts this recommendation and agrees that the Training Bureau should review footage and modify training policy accordingly and make any necessary policy recommendations to the Police Commissioner. PPD has been reviewing policy and practice since June 2020.
		42. Officers receive training, either through Pre- Service and/or In-Service or memo, promoting and requiring that the batons should remained holstered and only displayed in hand under the conditions outlined in policy and note that carrying batons when not needed can contribute to increased tensions with protestors and the community.	PPD accepts this recommendation.

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		43. Gas deployment policy and procedure should be re-examined and trained at all levels of the department. It is <i>critical</i> that gas (CS) deployments only be utilized when specific criteria has been met.	PPD will consider this recommendation with the understanding that only the SWAT Unit has access to gas.
		44. The PPD should view available video footage that appears to display tactical officers firing 37mm gas projectiles directly at individuals and determine if this is within their policy, procedure and training guidelines and address if determined that the actions were not.	PPD accepts this recommendation and is actively investigating any instances where tactical officers were not operating according to PPD policy.
		45. A specialized unit designated solely for crowd control and management should be established. This unit should have specific policy, procedures, training and equipment relating to best practices in crowd management. This unit should be the primary resource for when CS is needed to be deployed and their standard operation procedures and capacities should be understood by the entire department.	PPD accepts this recommendation, but to fully implement there may be budget implications above and beyond policy changes and training personnel. In place of a crowd control unit, all officers should be trained yearly in crowd control tactics.
		46. All PPD units and officers designated as responsible for deploying gas, should be required by policy to be equipped with BWC and have it activated when any gas is used.	PPD accepts this recommendation, but to fully implement there may be budget implications above and beyond policy changes and training personnel. In September 2020 PPD provided training to MIRT and Homeland Security officers, who can be issued temporary BWCs for any future protest detail.
		47. When launching or throwing chemical munitions do not target them into the populated areas of the protests. The	PPD accepts this recommendation.

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		targeted area should be less than 30' from people and have land them short in order to avoid having them injury people and be thrown back at officers.	
		48. The PPD should research and evaluate additional gas deployment devices that may be available and potentially more effective and offer reduced potential with unintended contaminations.	PPD accepts this recommendation, but this may have budget implications for implementation.
	PPD officers did not always correctly fill out their UOF reports, as required by PPD policy.	49. Reinforce, through policy and procedure, training and accountability, the need to articulate specific details as to where the baton strikes were applied on the body.	PPD accepts this recommendation.
	Community members and some PPD officers reported not hearing verbal warnings given prior to the dispersal of CS gas.	50. PPD should research and identify improved audio equipment that provides a better opportunity for their verbal warnings and commands to be delivered and heard by large crowds.	PPD accepts this recommendation.
		51. PPD personnel responsible for deploying gas should establish a predetermined script for announcing any deployments into large crowds. For example, <i>"This is the PPD and you are unlawfully assembled and subject to arrest...you should immediately leave this area (provide directions where you want them to go).....we will be deploying gas in 15 minutes if you do not leave"</i>	PPD accepts this recommendation, and will review the current PPD Civil Affairs and SWAT scripts being used prior to any enforcement actions.
	On multiple occasions, officers left the security of their teams and/or back-up to individually pursue suspects on foot or to clear	52. PPD should reinforce through training and policy that officers should not engage in foot pursuits and separated from back-up during these environments where the protesters are targeting the police unless there is a need to protect or prevent	PPD will consider this recommendation, but is also concerned about the message it sends to residents and business owners when properties are being vandalized. It should be noted PPD has a Directive 4.10 Foot Pursuits.

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	buildings that had been looted.	themselves or others from bodily harm. Property crime should not be grounds for individual officers engaging in foot pursuits under these conditions with limited resources and higher priorities.	
		53. Absent exigency relating to imminent bodily harm of self or others, it is recommended that officers do not clear dwellings and isolated areas alone but only when and back-up is available. Preservation of property should not be justification for an officers clearing unsafe areas and buildings alone.	PPD will consider this recommendation, but if implemented this will budget implications not currently contemplated.
		54. Command staff (white shirts) should have access to alternative shirts or jackets that are more tactically appropriate for officer safety during tactical situations such as room clearing.	PPD will consider this recommendation, but if implemented this will budget implications not currently contemplated.
	Many PPD vehicles were damaged during the demonstrations and civil disturbances.	55. PPD should examine and evaluate if there are any opportunities to improve upon maintaining squad security under these types of circumstances and reinforce any identified procedures through training- such as removing all weapons prior to leaving the squads.	PPD accepts this recommendation and policy and practice changes have been ongoing since June 2020.
<b>Information Sharing/Intelligence Gathering</b>	Due to a number of factors, the Civil Affairs Unit (CAU) was relatively ineffective at gathering operational information and intelligence during the Floyd protests.	56. While the CAU does an excellent job in addressing most protests, they are at a great disadvantage in dealing with protests that involve individuals who are unwilling to communicate with them, and in which looting and violence occur. It is recommended that the PPD include contingencies in planning for the	PPD accepts this recommendation.

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		gathering of intelligence without the CAU.	
	Pertinent information remained within silos, leading to a lack of coordination amongst internal and external partners.	57. Every operational plan should include a plan for communications. PPD personnel should receive training on this plan to ensure they understand proper protocols.	PPD accepts this recommendation.
	The modes of communication employed by PPD for information sharing were not ideal.	58. PPD should more clearly define protocols for the use of t-band during civil unrest, ensuring sensitive information is not made public. PPD can also work with partners who utilize encrypted radio channels, where appropriate.	PPD accepts this recommendation.
	At the time of the Floyd protests, PPD had gaps in the equipment and personnel necessary to provide real-time surveillance of unfolding incidents to IC and members of the UCG for real-time decision-making.	59. Increase technological capacities within the Intelligence Bureau to ensure strong intelligence is provided for strategic and tactical decision-making.	PPD will consider this recommendation. If implemented there will be significant budget implications, not currently contemplated
<b>Public Information and Warnings</b>	The communications team both responded to information requests and proactively pushed out information.	60. Ensure there is departmental representation from Communications in the Unified Command Group and Emergency Operations Center for future instances of civil unrest.	PPD accepts this recommendation.
	In initial phases of the response, there was no comprehensive strategy behind the development	61. Expand capacity and staffing of PPD Public Affairs Department, to include the filling of the Communications Director position.	PPD accepts this recommendation and has filled this position



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	and dissemination of information to the public.	62. Utilize a social media archival system to more effectively monitor ingoing and outgoing information from the 100+ PPD twitter accounts.	PPD accepts this recommendation as this is already part of the PPD planning process.
		63. Provide crisis communications training related to civil unrest to PPD and City Communications Departments.	PPD accepts this recommendation.
Perception and impacts on the community	Protestors in West Philadelphia, on Interstate 676, and in Center City were pejoratively affected by the PPD response.	64. Establish annual training for all officers that includes legal updates on protected First Amendment activities and how to determine when protected activity becomes unlawful activity.	PPD accepts this recommendation.
		65. During training on protected First Amendment activity, emphasize professionalism when engaging with protestors or when assigned to cover protests (i.e. conduct unbecoming of an officer)	PPD accepts this recommendation.
		66. Increase training on de-escalation tactics to be attempted prior to resorting to use of force.	PPD accepts this recommendation.
		67. In assessing enforcement needs in an area of protests and civil unrest, train officers to identify and distinguish peaceful, non-violent groups from violent groups.	PPD accepts this recommendation.
	Residents in West Philadelphia and other parts of the city, many of whom had no participation in the protests, still felt the impacts of PPD's response.	68. Going forward, the residents believe that the PPD needs to give more consideration to the feedback from the community. Many residents expressed a desire for reform of the "over-policing" of their communities.	PPD accepts this recommendation
		69. PPD's efforts in community engagement and community-oriented policing to	PPD accepts this recommendation and have begun the process of developing a

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		establish a positive relationship with the residents in all communities to establish the trust of the community.	revised action plan for community engagement, through the Community Relations Bureau.
		70. Increase the activity of Police Advisory Councils in all Police Districts around the City	PPD accepts this recommendation and has begun the expansion of PDACS across the city. .
		71. Employ all possible methods of communication to warn residents of threats in their area; instituting of curfews (with appropriate time for residents to adhere to the curfew); and with warnings of possible police use of force (i.e. deployment of tear gas) that may impact residential areas).	PPD accepts this recommendation.
		72. Ensure that messaging to the public that is transparent, reassures the public that the PPD is competent and working to keep all residents and their neighborhoods safe.	PPD accepts this recommendation.
	Some business owners who suffered property damage were dissatisfied with PPD's response to looting and vandalism in the city.	73. Establish a standard method of communication with small businesses in which they can be warned of the potential for civil unrest of other major incidents that may impact their businesses (i.e. looting and vandalism or major catastrophes).	PPD accepts this recommendation.
		74. When intelligence is received threatening looting and vandalism, plan the deployment of officers in sufficient number to respond to these locations with the ability to protect businesses.	PPD accepts this recommendation. PPD established divisional looting teams as of June 2020 to handle looting and vandalism.
		75. Prioritize the follow up with business owners to gather information for arrest	PPD accepts this recommendation. As of June 2020, investigative teams have

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	Community leaders and law firms in Philadelphia were troubled by various aspects of the PPD response to protestors, along with the level of communication throughout the course of the demonstrations.	and prosecution of looters (i.e. follow up with business owners to collect surveillance video from their businesses).	been established to follow up on arrests and prosecution for business owners.
		76. Establish a common method of communication between the Administration or UCG and City councilmembers during times of emergency (including protests and civil unrest) to provide updates on potential threats to communities, so City councilmembers can effectively respond to their constituent areas.	PPD accepts this recommendation. PPD will work to implement a more comprehensive communication strategy to enhance safety to the community and responding police officers.
		77. The lawyers recommended that, going forward, the Department should do five things: (1) improve its operational planning for its response to protests and civil disobedience; (2) revise its policies governing the use of less-than-lethal force to, among other things, ban the use of tear gas, strictly limit the use of pepper spray and other less-than-lethal munitions to circumstances where there is a substantial and imminent risk of death or serious bodily injury, establish a clear command structure for decision-making on the use of less-than-lethal force, and require officers to provide warnings before using physical force; (3) require all police personnel to wear observable identification and use body-worn cameras; (4) create a new directive requiring officers to intervene when another officer engages in unlawful conduct or violates departmental	<ol style="list-style-type: none"> <li>1. PPD has a robust process for development of Operational Orders but agrees to review the process to identify areas for improvement</li> <li>2. SWAT Tear gas standard operating procedures (SOPs) were reviewed in consultation with Law Department and PPD is in process of developing the necessary training to support the amended SOPs.</li> <li>3. PPD agrees and has addressed the issue. Instructions were provided to ensure mourning crepes do not intentionally or unintentionally obscure officer badge numbers.</li> <li>4. New draft directive has been created requiring officer intervention as required by the Active Bystandership for Law</li> </ol>

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		directives; and (5) improve their civilian and internal complaint process and their officer discipline process. The lawyers believe that the latter three recommendations are particularly important because the lack of officer accountability is a “historic problem” in Philadelphia and other cities across the country. They believe that PPD officers currently feel that they can act with impunity, and they want that to change.	Enforcement Training scheduled in the near future.  PPD accepts this recommendation.