



Establishing Comprehensive Integrity in Traffic Stop Data Collection

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INTRODUCTION

The integrity of traffic stop data collection is foundational to public trust and effective policymaking. Connecticut's recent experiences, particularly the scandal within the Connecticut State Police (CSP), have highlighted not only the need for rigor in data collection but also the broader implications of these practices. In the wake of that scandal, IntegrAssure was engaged to develop a notional methodology for the establishment of integrity in traffic stop data collection.¹

The CSP scandal, involving the falsification and misreporting of records between 2014 and 2021, not only potentially skewed data on the race and ethnicity of motorists stopped during that period by CSP, but naturally begged questions regarding the integrity of Connecticut law enforcement and the true prevalence of racial profiling in traffic stops. It is the goal of the methodology recommended in this report to meet the obvious need for enhanced data collection methods and appropriate oversight designed to assure the integrity of the data collected, and that through these process enhancements public trust can be restored.

This report delves into the complexities of traffic stop data collection in Connecticut, with a dual emphasis on establishing mandatory internal audit standards for departments state-wide and more rigorous external oversight. Our investigation and recommendations are framed within the context of ensuring the overall integrity of data collection, where technology plays a pivotal role in every aspect of the process. It presents an iterative approach to audit standards, understanding that not all recommendations are immediately feasible for every department.

With respect to potential mandates for departments statewide, we recognize the audit process as a critical tool, which we proffer can and should extend beyond the mere collection of data. Our approach is designed to identify not only data-collection issues but issues that encompass the legality of stops, the professionalism of officers, compliance with body-worn camera policies, tactical considerations, and any constitutional issues pertinent to the stops themselves and post-stop actions of law enforcement. By casting this wider net, the audit process becomes a comprehensive evaluation tool, scrutinizing not just data accuracy but also the adherence to legal and ethical standards, while at the same time imbuing a culture of continuous improvement in police agencies in Connecticut. The extent to which this broader methodology is recommended or mandated should be a point of discussion.

Our report includes a brief historical review of traffic stop data collection in Connecticut. This review aims to contextualize the current challenges and underscore the need for enhanced

¹ Information about IntegrAssure and its personnel who have contributed to this engagement can be found in Appendix A.

controls over the process. By understanding the past, we can better navigate the present and shape a more secure and trustworthy future for traffic stop data collection.

We acknowledge the multifaceted nature of this undertaking. Our recommendations are rooted in the belief that robust internal audits, empowered by technology, coupled with stringent external oversight, can collectively reform and refine traffic stop data collection and improve policing in Connecticut more broadly. This approach is not just about rectifying past shortcomings but about setting the standard of transparency, accountability, and fairness in law enforcement practices.

We also acknowledge that not every recommendation will be immediately feasible to implement by every agency in Connecticut and therefore have included a level-of-effort estimate for our recommendations. That being said, there are certainly immediate steps which can be taken to better assure the integrity of stop data.

Through this report, we aspire to contribute a meaningful blueprint for change, one that not only rebuilds public trust but also ensures that traffic stop data collection in Connecticut is a model of integrity and equity.

BRIEF HISTORY OF DATA COLLECTION IN CONNECTICUT

The historical evolution of the traffic stop data collection statute in Connecticut, particularly in the context of the Alvin W. Penn Racial Profiling Prohibition Act, represents a progressive journey towards ensuring fairness and transparency in policing practices. This evolution is marked by legislative foresight, technological adaptation, and a continuous response to emerging societal needs and challenges.

In 1999, the Connecticut legislature enacted the Alvin W. Penn Act, a pioneering move aimed at mitigating racial profiling in traffic stops. The Act mandated the collection of data on the race and ethnicity of drivers in traffic stops, intending to bring to light any potential biases in law enforcement practices. This initial phase was characterized by significant challenges, primarily due to the manual methods of data collection, which raised concerns about the accuracy and efficiency of the data. Law enforcement agencies struggled with standardizing the collection process across various jurisdictions, reflecting the gap between the legislative intent and its practical execution.

Recognizing the need for more comprehensive data to inform effective policymaking, the Connecticut legislature amended the Act in 2012 and 2013. These amendments expanded the scope of data collection, including more detailed information on the nature of stops and their outcomes. This period also marked the beginning of a significant shift towards digital data collection methods, signaling an acknowledgment of the crucial role of technology in enhancing the accuracy and ease of data analysis.

The Institute for Municipal and Regional Policy (IMRP) at the University of Connecticut² has played a pivotal role in the evolution and implementation of the Alvin W. Penn Racial Profiling Prohibition Act in Connecticut. This involvement has been particularly crucial following the legislative amendments made to the Act in 2012 and 2013. These amendments were aimed at creating a more robust system to address racial profiling concerns in traffic stop practices.

The IMRP, in consultation with the Office of Policy and Management (OPM), established the Racial Profiling Prohibition Advisory Board. This board was tasked with overseeing the design, evaluation, and management of the racial profiling study mandated by the amended Act (PA 12-74, "An Act Concerning Traffic Stop Information"). The primary purpose of this project was to monitor and prohibit racial profiling in Connecticut and to ensure compliance with the National Highway Traffic and Safety Administration (NHTSA) grant requirements. This included funding activities to prohibit racial profiling in the enforcement of state laws regulating the use of Federal-aid highways, collecting, maintaining, and providing public access to traffic stop data, evaluating the results of such data, and developing and implementing programs to reduce the occurrence of racial profiling.

The establishment of the Racial Profiling Prohibition Project Advisory Board was a strategic move to guide the implementation of the Act's amendments. The Board played a pivotal role in ensuring that data collection practices aligned with national best practices and effectively utilized technological advancements. Their guidance was instrumental in navigating the complexities of this transition, especially as law enforcement agencies grappled with system integrations, training needs, and maintaining uniformity in data collection across the state.

The shift towards digital data collection marked a new era in the evolution of the Act. Electronic reporting systems introduced enhanced efficiency and comprehensiveness in data collection. However, this transition was not without its challenges. The adaptation to new systems required significant efforts in terms of training law enforcement personnel and ensuring statewide uniformity in data collection practices.

Since May 2012, the Advisory Board and project staff have been meeting to outline and implement plans successfully under PA 12-74 and PA 13-75. Their early focus was on understanding traffic stop data collection and analyses in other states. This informed their approach to standardizing the method for collecting, recording, reporting, and analyzing racial profiling data in Connecticut. The project also involves collaboration with law enforcement, software vendors, and the Criminal Justice Information System (CJIS) to submit traffic stop information electronically.

The Connecticut Racial Profiling Prohibition Project (CTRP3) not only focuses on data collection and analysis but also provides public awareness, education, and training. This includes programs

² The IMRP was housed at Central Connecticut State University until October 1, 2021.

like "Fair and Impartial Policing (FIP)" to address conscious and unconscious bias in law enforcement. Additionally, CTRP3 facilitates forums throughout the state to enhance dialogue between law enforcement officials and community members.

The first analysis of Connecticut traffic stop data under the revised Alvin W. Penn Act was presented to the legislature in April 2015, with ongoing reports and updates since then. These efforts by the IMRP and the Advisory Board highlight a comprehensive approach to addressing racial profiling in traffic stops, combining data-driven analysis with community engagement and policy recommendations.

In recent years, the statute's implementation has continued to evolve, adapting to technological changes and emerging societal needs. The integration of technologies such as electronic ticketing, body cameras and GPS tracking reflects an ongoing commitment to using advanced tools to identify and address any disparities and potential biases in traffic stops.

This narrative of the traffic stop data collection statute in Connecticut underscores the importance of legislative foresight, technological adaptation, and the need for ongoing innovation in law enforcement practices. Understanding this historical context provides a foundation for addressing current challenges and shaping future directions in traffic stop data collection, ensuring that the principles of fairness and accountability are upheld in every aspect of law enforcement.

CONTINUED CHALLENGES IN DATA COLLECTION

The increased utilization of technology did not eliminate all issues relative to stop data and its collection. Some issues were apparent, but others would not emerge for years. While the system was built, in part, to standardize data, some departments were interpreting data fields differently. Moreover, manual entry of data, even when digitized, was prone to human errors. These errors could range from incorrect categorization of the race or ethnicity of drivers to misreporting the reasons for traffic stops or their outcomes. Lastly, varying levels of technological sophistication and resources across agencies led to difficulties in fully integrating the new systems. This resulted in fragmented data collection processes, with some agencies lagging in adopting the latest data collection technologies.

This resulted in some discrepancies in how data was recorded, categorized, and reported. Concerns remained about the integrity of traffic stop data, especially related to reporting errors which could skew levels of disparity potentially indicative of racial profiling. The absence of robust internal auditing and external oversight mechanisms meant that inconsistencies and errors often went unchecked.

What was missing from the process was robust oversight which allowed these issues to persist and grow. As these issues became public, trust in the law enforcement agencies' commitment to

transparency and accountability in traffic stop data collection began to erode. This was exacerbated by a lack of clear communication and transparency from the agencies involved.

The accumulating challenges and growing public scrutiny, significantly heightened by the state police scandal, placed increasing pressure on law enforcement agencies and state authorities to reform the traffic stop data collection process.

THE STATE POLICE SCANDAL

The issue of false reporting of stop data came to light following an investigation by Hearst Connecticut Media Group in 2022, which found that four state troopers had been investigated for the fabrication of traffic stop ticket data. This report prompted the Connecticut Racial Profiling Prohibition Project to conduct a comprehensive audit, which uncovered the extensive nature of what were found to be false and inaccurate stop data.

That audit revealed that hundreds of Connecticut State Police troopers and constables provided inaccurate information on at least 110,000 traffic stops between 2014 and 2021. Of the 110,000 inaccurate traffic stop records, the report characterized approximately 26,000 as false or inaccurate, 38,000 as having multiple errors, and 52,000 as duplicative. The report concluded that the inaccurate reporting led to skewed reports on the race and ethnicity of pulled-over motorists, with a significant number of drivers incorrectly identified by their race, ethnicity, age, and other demographic information. The false and inaccurate records raised concerns about the integrity of the state's racial profiling data. Overreported infractions were more likely to involve white drivers, while underreported violations often included Black or Hispanic motorists. These errors potentially downplayed the extent of racial and ethnic disparities in traffic stop numbers.

The revelations prompted a legislative hearing and a federal investigation. Connecticut's Office of the Chief State's Attorney initially launched an investigation, but it was later handed over to the U.S. Department of Justice. The Connecticut State Police instituted several reforms based on the audit findings. Governor Ned Lamont appointed Deirdre Daly, a former federal prosecutor, to lead an independent investigation. This inquiry aimed to understand how and why the discrepancies occurred and what reforms should be implemented to prevent recurrence. An order was issued for all state troopers to cooperate with the investigation.

The independent investigation into the Connecticut State Police (CSP) found significant failures in reporting racial profiling data, as mandated by the Alvin W. Penn Racial Profiling Prohibition Act. These included not effectively addressing known falsifications, inadequately supervising data entry, and lacking proper training. While initial audits suggested widespread intentional falsification among troopers and constables, further analysis found that most discrepancies could be attributed to issues like carelessness, lack of training, and technical problems, rather than intentional misconduct. Remedial measures and enhanced supervision, auditing, training, and technology improvements were recommended to ensure data accuracy and reliability moving forward.

The scandal has significantly eroded public trust in the Connecticut State Police and highlighted the need for more stringent checks and balances in the traffic stop data collection and reporting processes and is a stark reminder of the importance of integrity, accuracy, and transparency in law enforcement data collection and reporting. It underscores the need for robust systems to prevent falsification and ensure that the data accurately reflects reality. The responses to the scandal, including the legislative and federal investigations, as well as the internal reforms and independent review, indicate a commitment to rectifying these issues and restoring public trust.

Yet, the scandal was not an isolated incident but the result of a series of deep-rooted challenges in the system. The inconsistencies and gaps in data, coupled with emerging concerns about data integrity and oversight, created an environment where such a scandal could unfold. Understanding these challenges is crucial in addressing systemic issues and implementing reforms to prevent future occurrences.

LOCAL DEPARTMENT ISSUES

In the wake of the Connecticut State Police scandal, there has been increased scrutiny of local police departments regarding their data collection practices. Indeed, at least two local agencies have had significant issues.

HARTFORD POLICE DEPARTMENT

A Hartford police officer resigned after an investigation by the Department indicated that he had falsified records of over 200 traffic stops that were never made in 2022 and early 2023. The investigation arose after an internal audit conducted by the Department. According to reports, the officer acknowledged the falsification of data and resigned before the internal investigation was complete. An arrest warrant which was issued based on a fabricated stop was invalidated through the investigation. According to news accounts the officer indicated that his motivation of falsely reporting his level of stop activity was a desire to show his superiors more productivity than he actually had.

NORWALK POLICE DEPARTMENT

In 2021, a Norwalk police officer was also found to have falsified traffic stop data. The discovery of the falsification of data came about after a complaint from an out-of-state driver who through Norwalk's publication of warning data, realized that there was a false report of his being stopped by the officer, when in fact, such a stop never occurred. An internal investigation uncovered multiple instances of such alleged stops of out-of-state motorists being issued written warnings, which, in fact, never occurred. The officer resigned his position and was later indicted for his misconduct.

CONSTABLE ISSUES

The CTRP3 audit report highlighted several key findings related to constables and their reporting of traffic stop data, acknowledging the challenges in evaluating constable records due to the unique manner in which their records are maintained.

The audit identified the overreporting of infractions to the racial profiling database, indicating error issues including possible intentional falsification with respect to reporting. Additionally, discrepancies were noted where more records appeared in the CIB database compared to the racial profiling system, indicating underreporting to the racial profiling system in violation of the Alvin W. Penn Act. While there are a number of potential explanations for these discrepancies, some having to do with the issuance of violations for local ordinances, the discrepancies undermine the legitimacy of stop data collection in those jurisdictions employing constables.

FRAUD AND MISTAKE TYPOLOGIES

Using typologies in fraud detection and oversight is an important strategy for identifying and preventing potentially fraudulent activities. Typologies are essentially patterns or methods commonly used in fraudulent practices. By understanding these patterns, organizations can develop targeted strategies to detect and prevent fraud.

For example, in the financial sector, recognizing typologies such as identity theft, transaction fraud, or money laundering can help in creating specific monitoring systems. Similarly, in data management, understanding typologies like data manipulation, unauthorized access, or data theft guides the development of security measures and auditing protocols.

In essence, the identification of typologies allows for a more focused approach to fraud detection and prevention. It enables organizations to anticipate potential areas of risk and implement more effective oversight mechanisms. This proactive approach not only helps in mitigating current fraud risks but also in adapting to evolving methods of fraudulent practices.

In traffic stop data collection, three primary fraud typologies are particularly relevant: ghost reporting, misreporting, and underreporting. Understanding these specific typologies is crucial for developing targeted auditing and oversight mechanisms in traffic stop data collection.

GHOST REPORTING

Ghost reporting in traffic stop data collection refers to the practice of logging traffic stops that never actually took place. Officers might engage in ghost reporting for various reasons, such as to inflate activity numbers, meet perceived quotas, or create a false appearance of productivity and efficiency. In its most insidious form, ghost reporting could be used to skew demographic numbers so as to give a false reading on demographic disparities. This manipulation could, depending on the scale of the practice, impact the perceived prevalence of racial profiling or biases in law enforcement practices. By creating inaccurate records that misrepresent the demographics of

stopped drivers, such manipulation would clearly undermine the efforts to identify and address systemic issues in policing.

To mitigate ghost reporting, strategies such as cross-referencing of stop data with other independent sources such as dashcam and body-worn camera footage, GPS data from patrol vehicles, and communication logs. Regular audits and data analytics can also be used to identify patterns indicative of ghost reporting. Complaints are also a potential source for uncovering ghost reporting. Most importantly, fostering a culture of accountability and transparency within a police agency and setting realistic performance expectations can help reduce the incentive for ghost reporting.

MISREPORTING

Misreporting in traffic stop data collection involves the inaccurate recording of details of actual stops. This could be due to human error, misunderstanding, or intentional falsification aimed at hiding misconduct or biases. For instance, an officer might misclassify the reason for a stop or incorrectly record the demographic details of individuals stopped. To mitigate misreporting, comprehensive training and clear guidelines on data entry are foundational and essential. Regular audits, including cross-referencing traffic stop reports with body camera footage and dispatch records, can help identify discrepancies. The implementation of automated data entry systems that minimize human error and establishing a culture of accuracy and accountability within law enforcement agencies are also effective strategies.

UNDERREPORTING

Underreporting in traffic stop data collection occurs when officers fail to log certain stops. This might happen for various reasons, such as a misperception relative to mandatory reporting and a mistaken belief that the stop was not required to be reported, a desire to avoid paperwork, or an intention to conceal either misconduct or the extent of biased policing practices. To mitigate underreporting, appropriate training on policy mandates is fundamental. Utilizing technologies like GPS tracking and automated data entry linked with in-car and body-worn cameras and CAD reporting can help ensure that all stops are documented. Regular audits and cross-referencing with other data sources, including complaints, can further help in identifying and addressing underreporting issues.

THE ROLE OF BODY-WORN CAMERAS IN INTEGRITY ASSURANCE

Body-worn and in-car cameras (when available) are crucial in ensuring the integrity of traffic stop data. These tools not only provide an objective record of police-public encounters, including stops, but also reinforce accountability and transparency in law enforcement. The effectiveness of these cameras heavily relies on best-practice policies for their proper activation and use,

ensuring that they are consistently turned on and kept recording during an entire police encounter. Leveraging this technology effectively requires accountability of officers for camera activation and a comprehensive methodology for analyzing and reviewing the footage, ensuring that every aspect of police encounters, especially traffic stops, is accurately documented and assessable for review.

NOTIONAL METHODOLOGY FOR INTERNAL AUDITS TO BE CONDUCTED BY POLICE AGENCIES

This section outlines recommendations for internal audits that should be considered by the Connecticut Racial Profiling Prohibition Project (CTRP3) as a departmental mandate to address ghost reporting, misreporting, and underreporting in traffic stop data. These proposed audits are vital for maintaining data integrity and accuracy, allowing police departments to identify and rectify discrepancies. By aligning these audits with CTRP3 guidelines, departments can enhance transparency and accountability, ensuring that traffic stop data collection methods are both reliable and compliant with state requirements. While these audits are meant to ensure the integrity of traffic stops and the data being collected for each such stop, by utilizing a 360-degree assessment of those stop, any sub-standard actions of police officers can be identified and appropriately remediated.³ This will lead to a process of continuous improvement of officers and, derivatively, each department. The collateral benefit of this approach cannot be overstated, and, while perhaps ultimately proffered only as a recommendation as opposed to a mandate, serves to significantly further the mission of CTRP3 in promoting fairness and transparency in policing

The methodologies for our recommended audits include:

ASSESSMENT OF SELECTED TRAFFIC STOPS

For this audit both a random and targeted sample of traffic stops would be selected for detailed review, verifying the data against body-worn and in-car camera footage, GPS logs, and dispatch records.

TARGETED ASSESSMENTS

Targeting criteria include stops involving use of force including the display of firearms, vehicle or person searches, handcuffing, frisks, pursuits, summary arrests, and those generating citizen complaints.⁴ Each assessment would be conducted through a 360-degree review process, utilizing pre-designed rubrics for consistency. (See Appendix B for a notional rubric.). The review would include an analysis of body-worn camera (BWC) and in-car camera (ICC) footage, all related police

³ Generally, the remediation will consist of coaching, mentoring and additional training. Discipline will only be utilized in egregious or apparently incorrigible circumstances.

⁴ To the extent that a contact arose out of response to a crash, or the vehicle stop is associated with a separate motor vehicle or criminal complaint, no stop form is required to be completed.

reports and data, and any supervisory reviews conducted, ensuring a comprehensive evaluation of each stop's adherence to policies and procedures.

RANDOM ASSESSMENTS

For random assessments within the internal audit process, we proposed that a set number of traffic stops conducted by each officer per month, which do not meet the targeted criteria, be selected for review. The same rubric employed for targeted assessments would be utilized to assess these random stops. This approach ensures a broad and unbiased sampling of stops, enhancing the overall integrity of the audit process. By analyzing these randomly chosen stops, departments can identify patterns or issues not covered by targeted assessments, providing a comprehensive overview of traffic stop practices and adherence to departmental policies. This method complements targeted assessments, offering a balanced and thorough examination of police encounters.

DATA CROSS-REFERENCING

Cross-referencing of various data points of daily police activity would be conducted on a regular basis and would be designed to reveal aspects of non-compliance. Specifically, such cross-referencing would reveal unreported traffic stops⁵; failure to comply with body worn or in car camera policies; and failure to comply with the completion of traffic stop data form.

In the best-case scenario, the following data would be extracted in an automated fashion and cross-referenced in order to identify anomalies. Once perfected and tested, technical assistance from CTRP3 or other agency could be provided so as to develop a template for the data pull for each agency, with anomalies being highlighted for investigation by the agency.

The relevant data points⁶ would include:

1. CAD Data
2. RMS data including tickets/warnings; arrests; citations and pursuits
3. Centralized Infraction Bureau (CIB) data
4. BWC and ICC data
5. Vehicle Stop Data from the Form as collected, in the racial profiling database

The following anomalies should be resolved:

⁵ Not all police agencies in Connecticut require contact with a dispatcher when conducting a traffic stop, with the dispatcher issuing an incident number, with the incident not being able to be cleared until the stop form is completed. This would appear to be a best practice which would curtail the practice of "ghost stops".

⁶ There are certain reforms which would serve to best facilitate these audits. Inclusion of an agency's unique identifier for an incident (which should already be included in the agency's CAD, RMS and BWC/ICC data) should be included in both the CIB form and Vehicle Stop Data in order to best facilitate these ongoing audits. In addition, it would be helpful if POST facilitated the adoption of a unique identifier for each sworn officer in the state. Additionally, to address issues with respect to handwritten tickets, a mandate that all handwritten tickets be entered into the CIB database would be advisable.

- Stops that are contained in the CIB database but not in the Vehicle Stop database. There may in fact be valid reasons for this including whether the summons was issued for a non-traffic offense; was the result of a crash response or investigation; or was the result of certain exempt commercial vehicle enforcement activities. Nonetheless, these situations should be resolved either through an examination of the data or through further investigation. This process could and should be automated.
- Stops that are contained in the Vehicle Stop database but not in the CIB database. This could occur because of a verbal warning being issued.
- CAD data that indicates a traffic stop without BWC (or ICC) or without CIB or Vehicle Stop Data Form.
- CIB warning or summons entry without Vehicle Stop Data Form.
- CIB warning or summons entry without BWC or ICC.

PATTERN ANALYSIS

Use of the same data analytics to identify patterns potentially indicative of ghost reporting, misreporting, or underreporting, focusing on disparities in activity levels, demographic data, or outcomes.

The following patterns or scenarios should be identified and addressed:

- Significant disparities in peer-group comparison of activity level.
- Significant disparities in peer-group comparison of racial groups being stopped.
- Significant disparities in peer-group comparison of type of violations being cited (moving versus equipment).
- Significant disparities in peer-group comparison of frisks, searches, request for search, handcuffing, summonses, and arrests.

OFFICER INTERVIEWS

Clearly, interviews must be used to resolve issues which arise from these audits. Likely, most issues can be resolved at the line supervisor level and involve coaching, mentoring and training. That being said, situations may arise in which an internal investigation into intentional violations of policy is required.

In addition to resolution of specific issues, focus groups and surveys may be helpful in identifying issues that officers are generally having with stop data collection, and interpretation of related policies. The use of focus groups or surveys should ideally lead to the removal of barriers to full compliance with training or policy gaps being addressed and resolved.

TECHNOLOGY ASSISTANCE

Certainly, the utilization of BWCs and ICCs in the ways suggested is a substantial move forward in the ability to help ensure the integrity of stop data collection. There are potentially other tools

which would help facilitate the collection, collation, and analysis of data, which ideally would integrate into a tool that would select the appropriate items for review and enable the workflow for those reviews.

MANDATORY REPORTING TO CTRP3 OF COMPLAINTS INVOLVING VEHICULAR STOPS

As part of a comprehensive program to help ensure the integrity of vehicular stops and stop data, a critical step would be to require local police agencies to report complaints related to stops and stop data to the CTRP3⁷. Adoption of such a measure would enhance transparency and accountability by providing an awareness to CTRP3 of potential issues and in appropriate cases allow for an external review mechanism for grievances concerning traffic stops. It would enable CTRP3 to monitor and investigate complaints for patterns that may indicate systemic issues or individual misconduct in data reporting. Furthermore, this requirement would facilitate a more comprehensive oversight process, allowing CTRP3 to correlate complaint data with traffic stop records and identify discrepancies or irregularities. By centralizing the reporting of complaints, CTRP3 can serve as an impartial body to address concerns raised by the public and law enforcement personnel alike, ultimately contributing to the credibility and reliability of traffic stop data and reinforcing public trust in law enforcement practices.

MANDATORY REPORTING TO CTRP3 OF LOCAL AUDIT RESULTS

In addition to the mandatory reporting of complaints related to stops, mandating the reporting of audit findings, in accordance with the outlined audit protocols, to the CTRP3 would represent a significant step in bolstering the project's capacity to oversee and ensure the accuracy of traffic stop data. This requirement would facilitate ongoing monitoring and evaluation of law enforcement agencies' compliance with data collection standards, allowing for timely identification and investigation of potential irregularities. By receiving audit findings, CTRP3 would maintain a current understanding of each agency's data integrity, assess the effectiveness of implemented corrective actions, and identify trends that may warrant further scrutiny or systemic changes. It is recommended that such reports be submitted quarterly utilizing appropriate technology for the workflow of submission and receipt of the information. An analysis of the local audits could help guide the decision of which agencies would be appropriate for further inquiry or audit by CTRP3.

NOTIONAL LEVEL OF EFFORT OF EACH AUDIT COMPONENT

While many of the components of the suggested audit protocol should ideally be part of what every police agency does in terms of quality assurance, the implementation of the recommended internal audits to ensure the integrity of traffic stop data will necessitate a not insignificant level

⁷ Current law only requires police to report complaints of racial profiling to the Office of the Chief State's Attorney and CTRP3.

of effort from local police agencies, especially those agencies that are not currently engaged in an active effort to assure the quality of their work. It need not be said that such quality assurance, not only in the area of traffic stop data, but in all areas of police operations, is crucial for fostering continuous improvement in law enforcement practices.

Conducting assessments of selected traffic stops, both through targeted and random sampling, requires planning and execution. Officers will need to be trained in utilizing pre-designed rubrics for evaluations, to ensure consistency across assessments. The process involves analysis of body-worn and in-car camera footage, police reports, and supervisory reviews, demanding time and attention to detail.

Targeted assessments focus on stops with specific characteristics, such as use of force or searches, requiring a detailed examination of each encounter. Random assessments add another layer of oversight, ensuring that a broad spectrum of stops are reviewed for compliance and best practices.

Given recruitment issues and the broad array of supervisory duties, consideration should be given to civilianization or outsourcing of a portion of the required effort.

The cross-referencing of data points, including CAD and RMS data, BWC and ICC footage, and form submissions to the racial profiling database, adds a technical component to the audit. This requires some advanced analytical capabilities and the development of automated systems for data extraction and anomaly detection. Clearly, collaboration with CTRP3 for technical assistance to help build the right analytical framework and tools would be ideal, as would statewide inter-agency cooperation in refining these processes.

Similarly, the resolution of anomalies identified through data cross-referencing and pattern analysis would involve a systematic approach to investigating discrepancies which would require training and policy guidance.

Ultimately, the successful implementation of these audit methodologies hinges on a commitment to transparency, accountability, and a willingness to address any identified issues proactively. While this endeavor is undoubtedly resource-intensive, the potential for enhancing public trust and the effectiveness of law enforcement practices would make it a valuable investment.

NOTIONAL METHODOLOGY FOR OVERSIGHT BY CTRP3

CTRP3 plays a pivotal role in ensuring the integrity and accuracy of traffic stop data collection. Given its mandate, CTRP3, or a designated entity, could significantly enhance oversight through a series of structured audits and mechanisms:

REVIEW OF MANDATORY AGENCY REPORTING OF FINDINGS AND FAILURES

CTRP3 should systematically review the findings and failures reported by local police agencies as part of their internal audits. This review process would ensure that agencies are not only conducting their audits as required but are also taking corrective action based on their findings. CTRP3's role would involve verifying the accuracy of reported data, assessing any remediation undertaken, and providing feedback or directives for further improvement.

REVIEW OF COMPLAINTS INVOLVING VEHICULAR STOPS

Another critical oversight function would involve the review of complaints related to vehicular stops. CTRP3 could establish protocols for working with departments to receive, analyze, and potentially respond to such complaints, ensuring that they are thoroughly investigated by the relevant department and that appropriate actions are taken. This process would serve as a direct channel for addressing public concerns and enhancing transparency and accountability in traffic stop practices.

RANDOM AND TARGETED SELECTION OF DEPARTMENTS FOR COMPLIANCE AUDIT

CTRP3 could also conduct its own compliance audits, selecting departments for review through a combination of random selection and targeting based on specific criteria, such as the volume of traffic stops, previous audit findings, or the frequency of complaints. These audits could be conducted as meta-audits of the departmental audits, assessing their thoroughness, accuracy, and the effectiveness of corrective actions implemented.

HOTLINE

Establishing a hotline (telephone, email, and website) for reporting discrepancies, complaints, or concerns related to traffic stops and data collection could provide an additional layer of oversight. This hotline would allow for anonymous reporting, encouraging officers and the public to report issues without fear of reprisal. CTRP3 could monitor the hotline, triage reports for investigation, and track resolution outcomes.

ESTABLISHMENT OF DEPARTMENT POINTS OF CONTACT

CTRP3 should establish a users group providing a point of contact for each police department in the state. Doing so would facilitate the implementation of the suggested measures and would enhance the overall the ability of CTRP3 to realize the full potential of data collection. The group could meet on a regular basis, perhaps quarterly, and would share and discuss data concerns and mitigative strategies to address those concerns. In addition, having an established point of contact in each department, who would serve as a liaison between their department and CTRP3, allowing for quick and reliable dissemination of training and the provision of technical assistance on all issues related to data collection.

NOTIONAL LEVEL OF EFFORT AND POTENTIAL TIMELINE FOR IMPLEMENTATION

Implementing these oversight mechanisms would require an elevated level of effort and resources. The review of mandatory reporting, complaints, and conducting compliance audits would necessitate dedicated personnel with expertise in data analysis, law enforcement practices, and audit procedures. Establishing and managing a hotline would also require some operational and technical support.

This comprehensive approach to oversight by CTRP3 would significantly contribute to the integrity of traffic stop data collection, ensuring that police departments adhere to best practices and that any issues are promptly identified and addressed.

INTO THE FUTURE

Imagine a system where Computer Aided Dispatch (CAD) seamlessly interfaces with License Plate Recognition (LPR) technology. This advanced integration not only matches a vehicle's registration to its owner almost instantaneously but also brings up an historical view of the vehicle's interactions with law enforcement, providing a comprehensive and immediate context for the officer on duty, thereby enhancing their safety.

Going further, AI could also be employed to assess the "apparent" race, age, and gender of a driver using advanced image recognition algorithms. While there are serious ethical and accuracy considerations to address in the development of such technology, the goal would be to reduce subjective human reporting errors. This AI would not replace human discretion but would serve as a supplementary tool to provide officers with data that may assist in unbiased reporting.

The AI system could also be designed to observe and record post-stop actions. Utilizing a combination of body-worn camera footage and AI analysis, the system could document events during a stop, tagging specific behaviors and actions without human input, thereby reducing reporting burdens on the officer and enhancing the objectivity of the report.

At the conclusion of an incident, this system could auto-generate a report that captures all the relevant details of the stop, including the time, location, reason for the stop, the outcome, and any enforcement actions taken. Officers would review and, if necessary, add additional context to these AI-generated reports to ensure they accurately reflect the stop's events. Such a system would create an ecosystem where continuous auditing is built-in, with AI cross-referencing and validating data in real-time. Discrepancies could be flagged immediately, prompting further review or immediate corrective action. This would not only streamline the data collection process but also enhance the accountability and transparency of traffic stop procedures, fostering public trust and ensuring that law enforcement practices adhere strictly to the principles of justice and fairness.

The vision for such a technologically integrated future in law enforcement is predicated on thoughtful implementation, robust safeguards to protect civil liberties, and ongoing evaluation to address any unforeseen consequences. With the right balance of human oversight and AI efficiency, law enforcement can step into a new era where data integrity is assured and community relations are strengthened by trust in the systems designed to serve and protect.

CONCLUSION

The comprehensive examination of traffic stop data collection and its integrity within Connecticut, as detailed throughout this report, underscores both the complexity and the paramount importance of this endeavor. We have examined the historical evolution of data collection practices, and as illuminated by the shadow of the Connecticut State Police scandal, proposed rigorous methodologies for both internal audits and external oversight.

The proposed notional methodologies for internal audits and oversight by the Connecticut Racial Profiling Prohibition Project (CTRP3) offer a blueprint for systematic change. These methodologies are designed not merely as corrective measures but as a method for embedding transparency, accountability, and continuous improvement within the fabric of law enforcement agencies across Connecticut.

It is imperative to acknowledge that the journey towards establishing comprehensive integrity in traffic stop data collection is intricate and demanding. The adoption and implementation of the proposed methodologies will require a concerted effort from all stakeholders, including police departments, oversight bodies, and the community at large. This collaborative endeavor is essential for fostering a culture of integrity and trust, which are the bedrock of effective law enforcement and community relations.

This report underscores the significance of leveraging technology, such as body-worn cameras and automated data cross-referencing systems, as indispensable tools in the quest for data accuracy and integrity. These technological solutions, coupled with robust audit practices and external oversight, form a critical infrastructure to safeguard against data manipulation and ensure the fidelity of traffic stop data.

The integration of mandatory reporting mechanisms, both for complaints involving vehicular stops and for local audit results, is a strategic recommendation aimed at enhancing the oversight capabilities of CTRP3. Such mechanisms will not only enable timely identification and remediation of issues but also reinforce the collective commitment to transparency and accountability.

In conclusion, the path to restoring and maintaining public trust in law enforcement through impeccable traffic stop data collection is challenging. The recommendations outlined in this report are not mere suggestions but a call to action—a comprehensive framework designed to

elevate the integrity of traffic stop data collection to a standard that reflects the principles of justice and equality.

Our recommendations should not be seen not as an endpoint but as part of a continuous process of evaluation, adaptation, and enhancement. It is through the pursuit of continuous improvement that we can build a law enforcement system that is not only effective in its mandate but also unequivocally trusted by the community it serves.

APPENDIX A: ABOUT INTEGRASSURE AND RELEVANT PERSONNEL

IntegrAssure, a firm with extensive experience in police reform, is committed to improving public safety environments through ethical principles and innovative strategies. In the evolving landscape of law enforcement, IntegrAssure works closely with departments, as well as city, state and federal governments relative to improving police practices. Jeff Schlanger and IntegrAssure are currently in long-term oversight roles in Aurora (CO), San Leandro (CA), and Petaluma (CA), employing collaborative oversight designed to enhance public trust and establish sustainable public safety practices.

IntegrAssure's approach incorporates risk management and technology, such as body-worn camera video analysis, to identify performance issues for early intervention through coaching, mentoring, and training. By assisting police departments with the integration of such technology, IntegrAssure plays a crucial role in modernizing law enforcement agencies and their interactions with the public.

For further details on the specific nature of the work in these cities and how IntegrAssure's methodologies could help shape the future of law enforcement, please refer to their website: www.IntegrAssure.com.

JEFF SCHLANGER

Mr. Schlanger's experience spearheading high-profile independent investigations and oversight began in his role as a prosecutor in the Manhattan District Attorney's office (DANY), where he spent 12 years and rose to the level of both Senior Trial and Senior Investigative Attorney, the first individual to hold both such titles. During that period, Mr. Schlanger investigated and prosecuted some of the most notorious cases in the office, including the prosecution of the West Side gang known as the Westies and the prosecution of John Gotti, the head of the Gambino Crime Family.

Mr. Schlanger left DANY in 1990 and formed a private investigations firm which was bought by Kroll in 1998, the world's leading investigations firm at the time. At Kroll Mr. Schlanger headed the Security Services practice and founded the Government Services practice, and, with William Bratton, began consulting to major police departments around the world. He was instrumental in the proposal for and the design and execution of the monitoring methodology in Los Angeles, serving as the Deputy Primary Monitor for the Los Angeles Police Department (LAPD) consent decree for eight years. During this period, he was responsible for all operations of the monitorship including the review of LAPD's compliance with all reform efforts. During that same time period, Mr. Schlanger performed significant independent investigations at the request of large police departments throughout the country including the Tennessee Highway Patrol (an investigation into corruption in the hiring and promotion process), the San Francisco Police Department (an investigation into an internal affairs investigation probe involving the son of a Chief in the Department), and the Austin Police Department (investigative reviews of two separate fatal officer-involved shootings). In addition, Mr. Schlanger led major investigations and coordinated

security for the private sector and led the Security Services Group through the tumultuous aftermath of 9/11.

In 2009, when Kroll's Government Services Practice was spun out, Mr. Schlanger became the president and CEO of the new entity, KeyPoint Government Solutions. KeyPoint employed more than 2500 investigators responsible for performing security clearance investigations on behalf of various agencies of the U.S. government. During this same period, Mr. Schlanger also served as the Primary Deputy Monitor of HSBC, developing methodologies and overseeing their implementation to ensure remediation of the bank's involvement in financial crime throughout the world. The HSBC monitorship today stands as the most complex and comprehensive monitorship ever implemented.

In 2014, Mr. Schlanger left KeyPoint to re-join the public sector as the chief of staff to Manhattan District Attorney Cyrus Vance. At DANY, Mr. Schlanger oversaw the day-to-day operations of the office with more than 500 attorneys and 700 support staff. Mr. Schlanger also oversaw a number of special projects for the office, including its "Extreme Collaboration" program with the New York City Police Department (NYPD) which included the funding of NYPD's mobility initiative from forfeiture funds, providing approximately 36,000 officers with smart phones and the infrastructure to support those devices. Today, those devices continue to be an indispensable tool for NYPD officers.

In 2015, Mr. Schlanger left DANY, to join Exiger as president of its advisory division. There, Mr. Schlanger again oversaw the work on the HSBC Monitorship, as well as all other advisory engagements. In 2016, Mr. Schlanger led a team of policing professionals in the comprehensive review of the University of Cincinnati Police Department (UCPD), conducted in response to a fatal officer-involved shooting. The project included a thorough review of the UCPD and an analysis of its current practices relative to best practices in policing. The report found more than one hundred areas for improvement and made more than 275 specific actionable recommendations for improving the department while at the same time rebuilding trust between the UCPD and its community. Mr. Schlanger was then chosen to be the monitor of the department, overseeing the implementation of those recommendations. This monitorship was voluntary, supported and embraced by the University and the community as a way to provide assurance to the public that the reforms to which the UCPD had committed were actually being undertaken.

In 2018, Mr. Schlanger again left for the public sector, joining the NYPD as Counsel to the Police Commissioner. Three months later, Mr. Schlanger was asked to take on the position of Deputy Commissioner for Risk Management as the department elevated the risk management function to bureau (three star) status. Mr. Schlanger served in this capacity until March of 2021, helping to guide the Department through its most tumultuous period ever, implementing reforms brought about by both the federal monitorship arising out of stop and frisk abuses and the tragic murder of George Floyd.

In his role as Deputy Commissioner for Risk Management, Mr. Schlanger also sat on numerous departmental committees including the Use of Force Review Board and the Disciplinary Committee and headed the Use of Force and Tactics Working Group.

Over the years, Mr. Schlanger has also served in numerous pro bono positions including as Special Assistant District Attorney in Nassau County investigating a particular cold-case homicide as well as a separate claim of innocence in a child molestation conviction; and as Special Counsel to the New York State Commission on Public Integrity, involving an investigation into corruption and perjury allegations involving the governor of the state.

Mr. Schlanger started his latest venture, IntegrAssure, upon his departure from NYPD in March of 2021. IntegrAssure focuses on integrity assurance processes in both the public and private sectors. He currently serves as the Independent Consent Decree Monitor for the City of Aurora (CO), and the Independent Police Auditor of both San Leandro and Petaluma, California.

Mr. Schlanger is a graduate of Binghamton University and New York University School of Law and holds a federal security clearance.

DEAN ESSERMAN

Dean Esserman has more than three decades of experience in law enforcement and is currently serving as the Senior Counselor of the National Police Foundation. He started as an Assistant District Attorney in Brooklyn, New York from 1983 to 1987. He went on to serve as a Special Assistant United States Attorney before serving as General Counsel to Chief William Bratton of the New York City Transit Police from 1987 to 1991. He was the Assistant Chief of Police in New Haven, Connecticut from 1991 to 1993, where he put into effect a community policing plan, cut crime city-wide and established the Connecticut's first federally funded Drug Gang Task Force. He then became Chief of Police for the M.T.A. Metro North Police Department, headquartered in New York City, serving from 1993 to 1998. In 1998, he was appointed as Chief of Police in Stamford, Connecticut. He was also concurrently appointed, while serving as Chief, by the Federal Courts as the Monitor of the Walkill, New York Police Department in 2000. In 2002, he returned to New York City to join Thacher Associates. Later that year, he was recruited as Chief of Police of the City of Providence, Rhode Island, where he served 8 ½ years until July 1, 2011. He was also appointed as a Distinguished Professor and Executive in Residence at the Roger Williams University School of Justice Studies. On October 18, 2011, he was recruited back as the Chief of Police for the City of New Haven, Connecticut. Upon returning to New Haven in 2011, he was also appointed as a visiting faculty member at both Yale University and the Yale Law School as well as being appointed as a visiting faculty member and practitioner in residence at the University of New Haven. He also holds a lecturer's appointment at the Yale University Child Study Center.

He has served as a member of the Board of the Vera Institute of Justice, the National Police Foundation, the Police Executive Research Forum (PERF), and the Hurricane Island Outward
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Bound School. Presently he serves as a member of the Board of the Local Initiatives Support Corporation (LISC). He is a lifetime member of the IACP and served as the Chair of the Juvenile Justice and Child Protection Committee. He is a graduate of the Federal Bureau of Investigation's (FBI) National Executive Institute and the Law Enforcement Counter Terrorism Program. He is also a graduate of the Police Executive Research Forum's Senior Management Institute for Police and the United States Secret Service Dignitary Protection Program. He is a graduate of Dartmouth College (BA) and New York University School of Law (JD) and is a member of the New York and Massachusetts Bars.

APPENDIX B: 360-DEGREE ASSESSMENT METHODOLOGY