

VOLUSIA SHERIFF'S OFFICE



Sheriff Michael J. Chitwood

2021 ANNUAL ANALYSIS on 2020 Use of Force and Pursuits

In accordance with Standard Directives 1.1. Use of Force Guidelines, 1.3 Use of Less-Lethal Weapons and Devices and 41.2 Motor Vehicle Apprehension, the Professional Standards Section shall complete an annual analysis of all pursuits and use of force, to include use of deadly force, less-lethal force, and agency policies and practices.

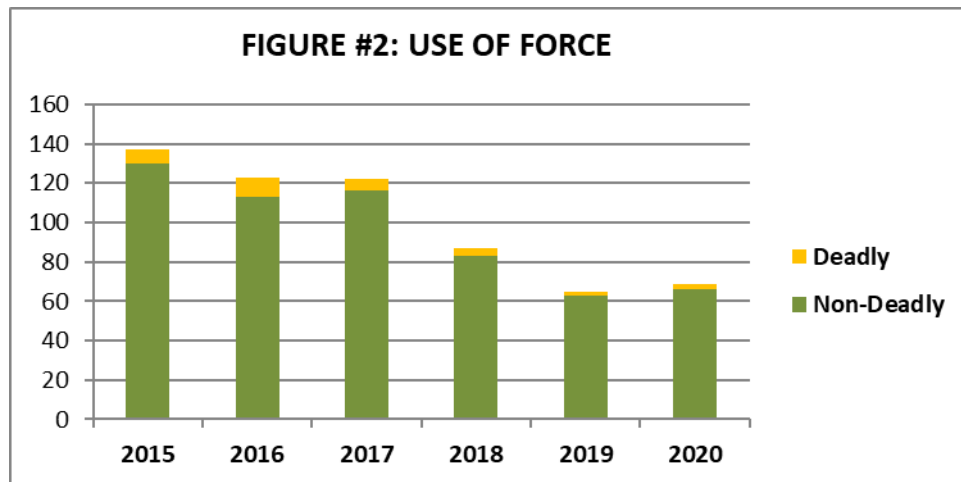
The purpose of the annual analyses is to provide an additional means outside of the administrative review process to identify and address training deficiencies/opportunities, use of force trends among Deputies, and for protection of the Deputy, the Sheriff's Office, and the community.

FIGURE #1: Four Year Statistical Review Summary

	2017	2018	2019	2020
Total Calls For Service	275,384	260,722	262,693	275,070
Total Arrests (Source: UCR)	13,079	10,488	9,370	6,459
Total Index Crime Rate (Source: UCR)	1,586	1,452	1,172	1,023
Deadly Force Incidents	6	4	2	3
Deadly Force Persons	6	3	2	3
Deadly Force Vicious Animals	0	1	0	0
Deadly Force Accidental Discharge	0	0	0	0
Less-Lethal Force Incidents	116	83	63	66
Total Use of Force Incidents	122	87	65	69
Total Vehicle Pursuits (Source: IAPRO)	5	7	6	6

2020 USE OF FORCE

During calendar year 2020, the Volusia Sheriff's Office made 6,459 total arrests (Ref.: 2020 UCR statistics). In effecting these arrests, the number of incidents requiring use of force in response to subject resistance was 69 incidents, or less than 1.1% of total arrests and less than 0.03% of all calls for service interactions with the public. The remaining 98.9% of all interactions were made without incident.



TREND ANALYSIS:

The above 6-year trend line indicates a decrease in use of force incidents from 2015 through 2019; in calendar year 2020, there is a slight increase in use of force - 6.2% in response to subject's resistance. This may be attributed in part due to the civil unrest nationwide and public perception of law enforcement related to highly publicized incidents.

DEADLY FORCE:

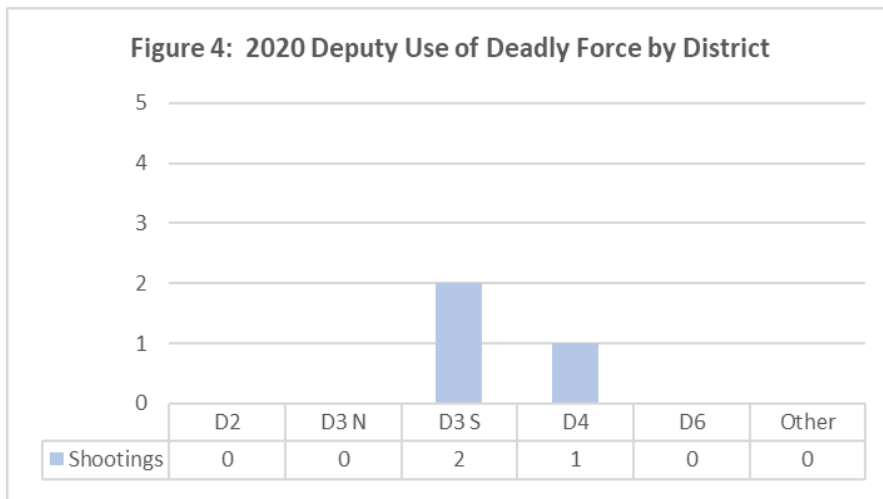
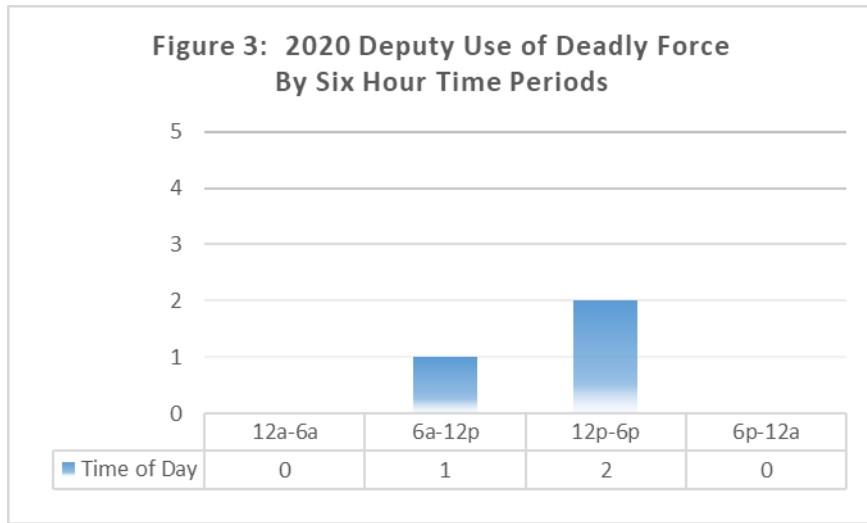
Of the 155 uses of force in 2020, two (2) incidents (0.013%) involved the use of deadly force with a firearm against a person. In accordance with VSO's MOU with the Florida Department of Law Enforcement (FDLE), FDLE investigated the incidents and forwarded final reports to the State Attorney's Office (SAO) for review. No further action was deemed necessary in the cases.

Additionally, one (1) incident (0.006%) involved the use of deadly force (chokehold) against a person. This incident was investigated administratively, and the deputy was terminated for sustained violations of VSO Standard Directives and Volusia County Merit System Rules and Regulations.

DATE, TIME AND LOCATION OF DEPUTIES UTILIZING DEADLY FORCE

The first deputy involved shootings occurred on May 12, 2020, at approximately 1517 hours in District Four (City of Deltona) and the second on November 21, 2020 at approximately 1617 hours in District Three-South (City of Port Orange).

The deputy-involved use of a chokehold occurred on July 25, 2020, at approximately 2339 hours in District Three-South (City of Port Orange).



RACE, GENDER AND AGE OF SUBJECTS IN DEADLY FORCE INCIDENTS

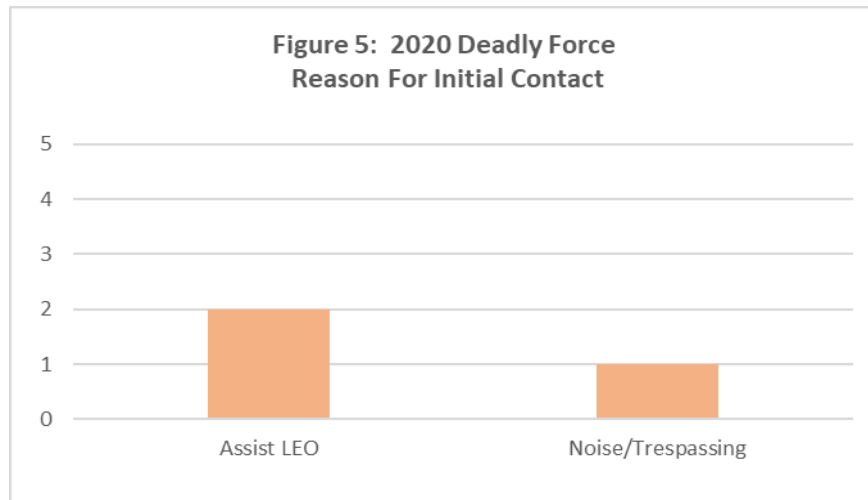
The subject in the first deadly force shooting incident was a Caucasian male, who was 37 years old at the time of incident.

The subject in the use of a chokehold was a Caucasian male, who was 21 years old at the time of incident.

The subject in the second deadly force shooting was a Caucasian male, who was 25 years old at the time of the incident.

REASON FOR INITIAL DEPUTY CONTACT

The reasons for the initial deputy contact in the deadly force incidents are: (3) three calls for service (assist DLPD with a fleeing suspect, assist POPD with a fleeing armed suspect, and noise/trespassing complaints).



Case Report #20-8856 May 12, 2020

On May 12, 2020, deputies responded to a report of a fleeing driver coming from the City of DeLand. Deputies spotted and began following the vehicle as it entered the City of Deltona. Deputies were able to successfully deploy stop-sticks, at which time, the vehicle stopped in front of 501 Haversham Road, Deltona. The driver of the vehicle, later identified as Gregory Howe, pointed a shotgun at the deputies. Deputies fired rounds at Howe, who was struck multiple times and pronounced deceased at the scene.

FDLE completed their investigation and forwarded it to the State Attorney's Office for review. The State Attorney's Office determined no further action was required. VSO Internal Affairs found the actions taken by deputies were within compliance with VSO Standards and Directives. [JUSTIFIED]

Case Report #20-13365 July 25, 2020

On July 25, 2020, an off-duty deputy, who was a courtesy officer for an apartment complex he resided in, responded to the pool area of the complex due to noise and trespassing complaints. The deputy was unarmed and not in uniform at the time of incident. Upon arrival to the pool area, the deputy contacted several individuals who were at the pool, being disruptive. The deputy identified himself as a Deputy Sheriff verbally and by showing his law enforcement credentials, and gave lawful commands to the individuals to exit the pool area. One of the individuals became argumentative with the deputy, and subsequently began brushing shoulders with him. The deputy subsequently placed the individual into a chokehold while escorting him to a lounge chair. A few moments later, the deputy allowed the individual to stand up, at which time the individual fled the area on foot. The individual was later located by Port Orange Police (POPD case report number 20-5016), and advised he was uninjured because of the deputy's actions. A supervisory inquiry into the incident was completed, and IA upgraded the incident to an official internal investigation on August 5, 2020.

Internal Affairs investigated the incident, and presented to the Sheriff and Command Staff for determination. The Sheriff sustained several VSO Standards and Directives and Volusia County Merit System Rules and Regulation violations against the deputy, including VSO Standards and Directive - 26.2.105 Unlawful Use of Deadly Force. The Sheriff subsequently terminated the deputy's employment on September 15, 2020.

Case Report #20- 21349 November 21, 2020

On November 21, 2020, Deputies responded to assist a Port Orange police officer with an armed suspect, Matthew Thomas; Thomas fled recklessly at high speed when a Port Orange police officer attempted a traffic stop. Officers followed the car as it headed towards New Smyrna Beach. Deputy Bergeron deployed stop sticks in the area of Turnbull Street and Industrial Park Avenue, Port Orange outside a storage facility disabling the vehicle. Thomas bailed out of the vehicle and started firing at police. NSBPD Officer Hunnefeld, Officer McCallister, Officer Deal and Deputy Bergeron returned fire, killing Matthew Thomas. NSBPD Officer Hunnefeld was injured in the incident.

FDLE completed their investigation and forwarded it to the State Attorney's Office for review. The State Attorney's Office determined no further action was required. VSO Internal Affairs found the action taken by the Deputy was within compliance with VSO Standards and Directives. [JUSTIFIED]

LESS-LETHAL FORCE:

Based on the number of subjects and the level of subject-resistance, some incidents required multiple-deputy response and/or transition between more than one type of less-lethal force/weapon. Subsequently, more than one "use" of force per incident may be reported, resulting in a higher number of "uses" when compared to the number of "incidents" responded to.

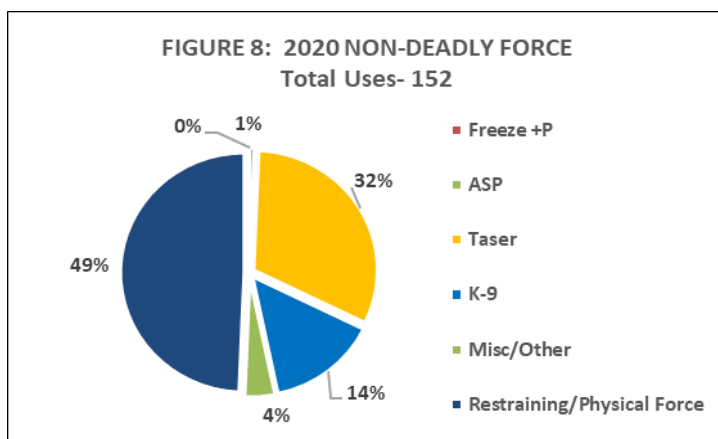
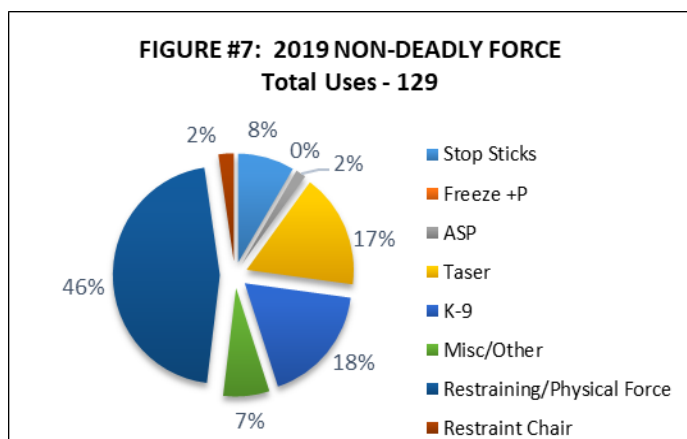
In 2020, deputies responded to 66 different incidents requiring use of less-lethal force in response to subject(s) resistance. These 66 incidents required a combined total of 152 uses of various types of less-lethal force. The table below (figure 6) breaks down the less-lethal force by type and corresponding number of uses:

FIGURE #6: BREAKDOWN OF NON-DEADLY FORCE BY TYPE

TYPE OF USE:	2016 No. of Uses	2017 No. of Uses	2018 No. of Uses	2019 No. of Uses	2020 No. of Uses
Stop Sticks [Pursuit related]	40	28	13	11	*
Freeze +P	1	2	0	0	0
ASP	2	3	0	2	1
Taser	44	39	53	22	48
K-9	31	29	23	23	22
Drag-Stabilized Impact	0	0	0	0	1
Misc./Other (hobble, misc.)	4	2	3	9	5
Restraining / Escort / Physical Force	43	35	67	59	75
Restraint Chair (ERC)	3	0	1	3	0
TOTAL COMBINED USES:	168	138	160	129	152

* Pursuit related Stop Sticks no longer counted with Non-Deadly Force.

LESS-LETHAL FORCE BY TYPE: 2019-2020 COMPARISON



ANALYSIS BY TYPE OF FORCE:

Top Three Less-Lethal Options Utilized:

75 uses of Restraining Force / Physical (49%)

48 uses of Taser (32%)

22 uses of K-9 (14%)

RESTRAINING / PHYSICAL FORCE: Restraining/physical force represents 49% of all less-lethal force used during 2020 (75 uses). All uses of restraining/physical force were administratively reviewed through the chain of command and all but four uses were found to be in compliance with policy. One deputy received verbal counseling and the other three remedial training.

K-9: K-9 use remained one of the top three uses for 2020 at 14% of the total uses (22); all uses were administratively reviewed and all were found to be in compliance with policy.

TASER: Taser use remains in the top 3 less-lethal use of force options, with 32% of the total (48 uses). Taser usage as a less-lethal use of force increased 118% in 2020 when compared with 2019; in eight incidents (20 uses – 42%), subjects were armed or reported to be armed (2 – gun, 2 - knife, 1 – scissors, 1 – pulling on LEO’s gun, 1 – reported armed with a gun, and 1 - attempted to use a fire extinguisher on a Deputy). Subjects resisted Deputies with active or aggressive resistance in all but one less-lethal force Taser incident. All Taser uses were administratively reviewed through the chain of command and all but four uses were found to be in compliance with policy. Three Deputies received remedial training and a Deputy was terminated due to the location of a drive stun. Taser continues to be a valuable less-lethal option for Deputies to use with little or no lasting effects or injury to the subject.

MISC./OTHER: The other uses of less-lethal force in 2020 were: one (1) use of the asp (0.6%), one (1) use of drag stabilized impact munition (0.6%), and three (3) uses of a hobble to prevent injuries to Deputies or subjects’ self-harm (2.0%). The final two uses of less-lethal force were one (1) use of a flashlight as a tool of convenience (0.6%), and one (1) use of a Taser as a tool of convenience (0.6%). All of these other uses of force were found in compliance with policy.

INCIDENTS vs. USES:

The following chart (Figure #9) is a 5-year comparison in the numbers of less-lethal incidents to the subsequent uses of force in response to subject resistance. NOTE: A “*use-to-incident ratio*” is also provided for a proportionate comparison between years:

FIGURE #9: LESS-LETHAL INCIDENTS VS. USES IN RESPONSE TO RESISTANCE

5-YEAR COMPARISON:	2016	2017	2018	2019	2020
Total Arrests	12,454	13,079	10,488	9,370	6,459
Total Less-Lethal Incidents	113	116	83	63	66
Total Uses of Force (Responses to Resistance)	168	138	160	129	152
<i>Average Uses of Force per Incident (Ratio)</i>	1.5	1.2	1.9	2.0	2.3
Average Uses of Force per Arrest (Ratio)	.013	.011	.015	.014	.023

Analysis of the above chart shows that while the number of less-lethal force incidents show a trending decline of 45.7% from 2017 – 2019, in 2020 less-lethal incidents increased 4.8% when compared to the previous year. The average uses of force per incident ratio from 2017 through 2020 show an upward trend in subject’s resistance and failure to comply with lawful commands given by deputies.

This consistent application of force regardless of the spikes and fluctuations in incidents over each of the 5 years may be attributed in part to the agency’s commitment to scenario-based training with emphasis on professional and effective command presence, swift control of the situation and subsequent de-escalation on the part of the Deputies.

MULTIPLE-DEPUTY RESPONSE:

Of the 66 incidents responded to by the agency, *38 incidents* (43%) required a combination of *multiple-deputy* response and accounted for *110 of the 152 uses* (72%) of less-lethal force:

- 2-Deputy response = 22 incidents (33%); 55 uses (36%)
- 3-Deputy response = 12 incidents (18%); 40 uses (26%)
- 4-Deputy response = 3 incidents (5%); 9 uses (6%)
- 5-Deputy response = 1 incident (1%); 6 uses (4%)

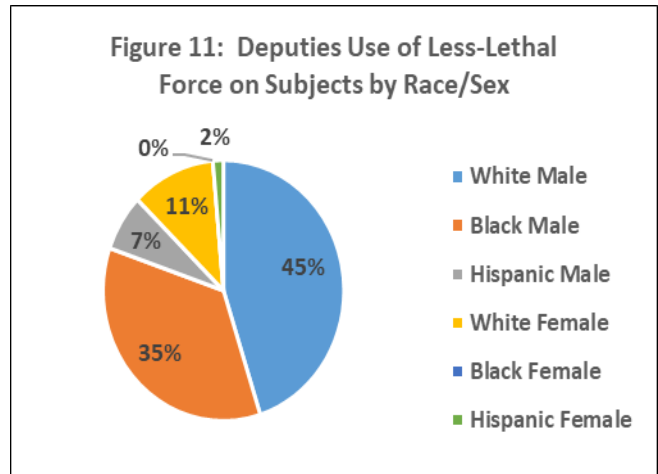
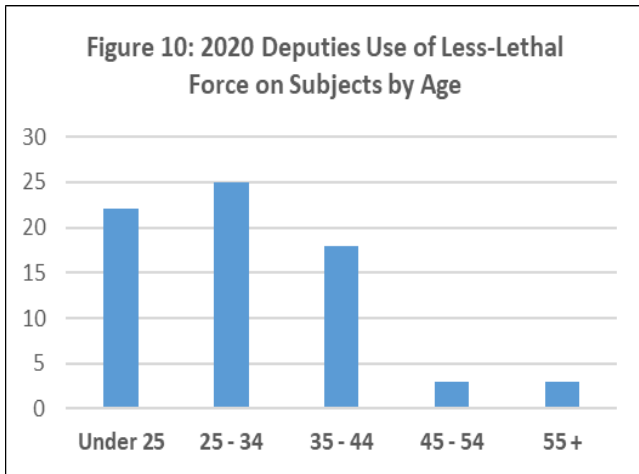
SINGLE-DEPUTY RESPONSE:

The remaining 28 incidents (42%) required single deputy response to resistance and accounted for 42 uses (28%) of less-lethal force.

RACE, GENDER AND AGE OF SUBJECTS IN LESS-LETHAL USE OF FORCE INCIDENTS

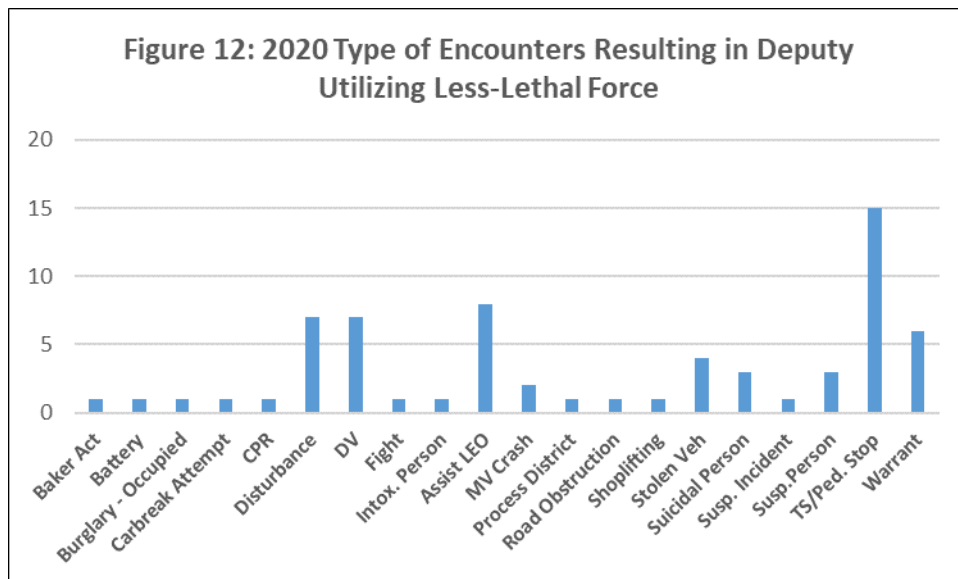
Deputies utilized less-lethal force in response to resistance on 71 subjects. Of the 71 subjects, 62 are male - (87%) and 9 are female – (13%); 32 Caucasian males – (45%), 25 African American males – (35%), 5 Hispanic males – (7%), 8 Caucasian females – (11%), and 1 Hispanic female – (1%).

The subject's age in less-lethal use of force are: 22 subjects under the age of 25 – (31%), 25 subjects between 25 – 34 years of age – (35%), 18 subjects between the ages of 35-44 (25%), 3 subjects between 45-54 years of age – (4%), and 3 subjects are 55 years of age and older – (4%).



TYPES OF ENCOUNTERS RESULTING IN DEPUTY UTILIZING LESS-LETHAL FORCE

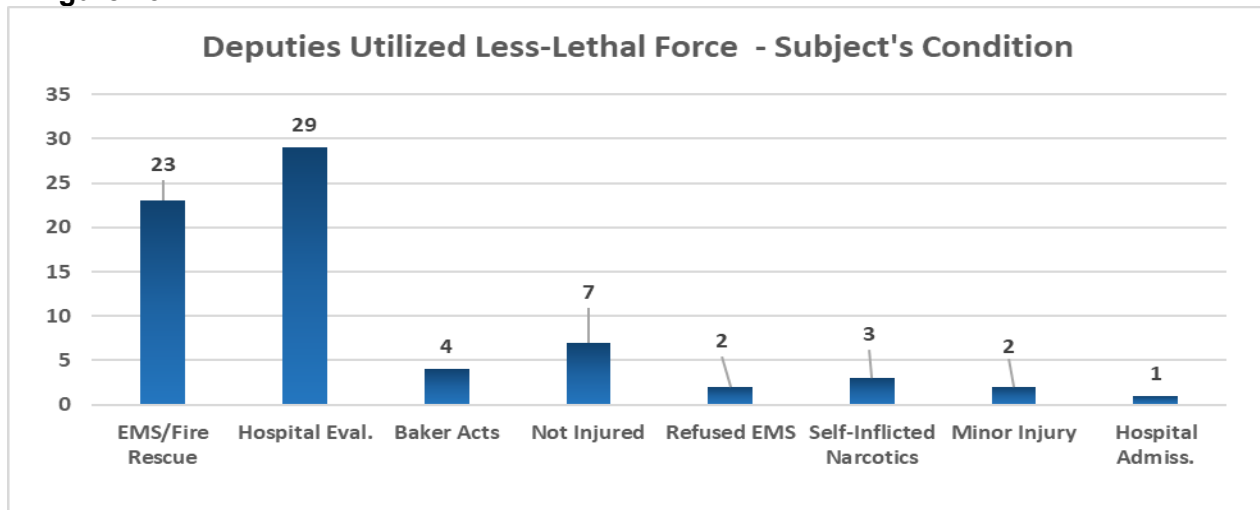
Deputies responded for a baker act - 1.5%, a battery – 1.5%, an occupied burglary – 1.5%, a car break attempt – 1.5%, a CPR call – 1.5%, seven (7) disturbance calls – 10.6%, seven (7) domestic violence calls – 10.6%, a fight call – 1.5%, an intoxicated person call – 1.5%, eight (8) assisting other law enforcement agencies – 12.1%, two (2) motor vehicle crash calls – 3.0%, processing at District office – 1.5%, a road obstruction call – 1.5%, a shoplifting call – 1.5%, four (4) stolen vehicle calls – 6.1%, three (3) suicidal person calls – 4.6%, a suspicious incident call – 1.5%, three (3) suspicious person calls – 4.6%, 15 traffic stop/pedestrian stop – 22.7%, and six (6) warrant service attempts – 9.1%.



DEPUTY UTILIZED LESS-LETHAL FORCE – RESPONSE TO SUBJECT RESISTANCE

Of the 71 subjects where deputies responded to resistance with less-lethal force, the following summarizes the subjects' injury/condition: 7 subjects were not injured (10%); 3 subjects ingested narcotics (4%), 2 subjects had minor injuries not requiring EMS (3%); 23 subjects were treated/released by EMS or Fire/Rescue (32%); 2 subjects refused EMS (3%); 29 subjects were evaluated at a hospital (41%); 1 subject was admitted to the hospital with a broken femur (1%); and 4 subjects were admitted to the hospital as a Baker Act (6%).

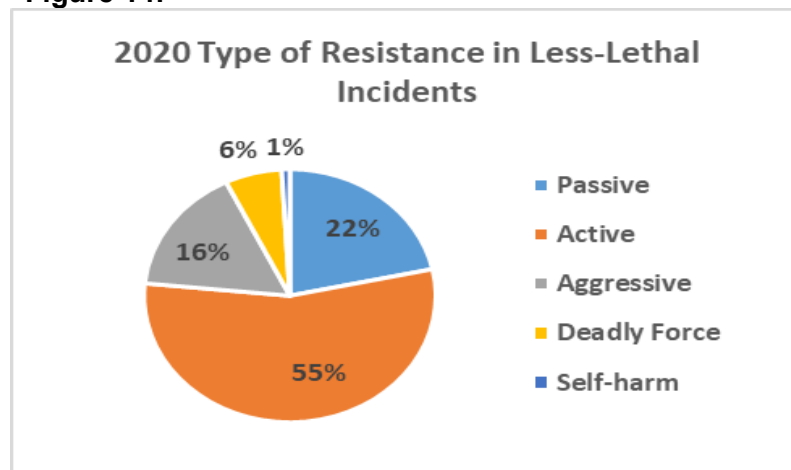
Figure 13:



TYPE OF RESISTANCE DEPUTIES ENCOUNTERED IN LESS-LETHAL FORCE INCIDENTS

During calendar year 2020, Deputies responded to 66 different incidents that required use of less-lethal force in response to subjects' resistance. In the 39 of these incidents, Deputies utilized less-lethal force in response to more than one level of resistance or 59% of the 66 incidents. The subjects' resistance in the 66 incidents were active resistance – 61 (55%), aggressive resistance – 18 (16%), passive resistance – 24 (22%), deadly force/life threat to others – 7 (6%), and self-harm – 1 (1%).

Figure 14:

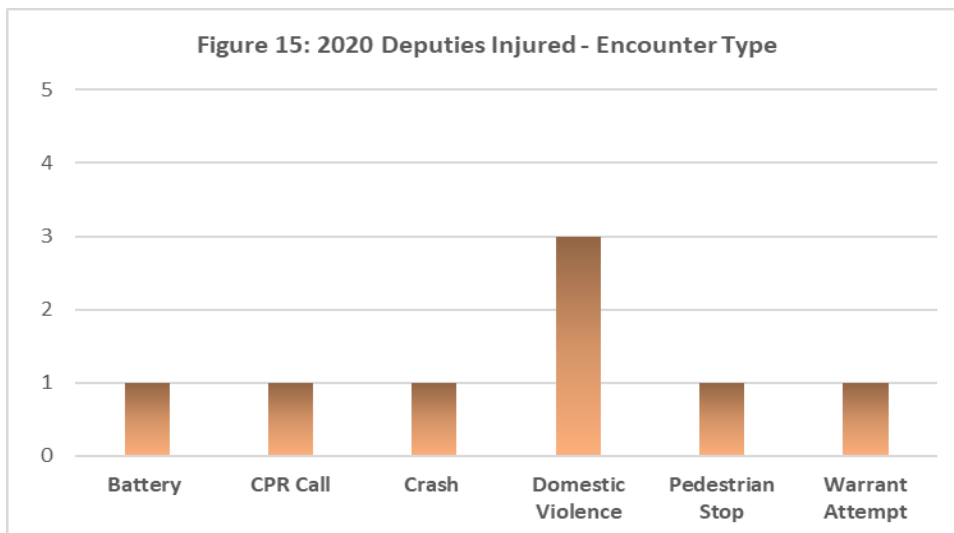


In the 39 incidents where the subjects resisted deputies in more than one type of resistance, the nature of call was: assist LEO – 5 (13%), baker act – 1 (3%), CPR call – 1 (3%), crash – 3 (8%), disturbance – 3 (8%), domestic violence – 5 (3%), intoxicated person – 1 (3%), road obstruction – 1 (3%), stolen vehicle – 1 (3%), suicidal person – 4 (10%), suspicious incident/person – 4 (10%), traffic/pedestrian stop – 7 (18%), and warrant attempts – 3 (8%).

DEPUTIES INJURED IN ENCOUNTERS WHERE LESS-LETHAL FORCE UTILIZED

In the 66 incidents where Deputies utilized less-lethal force, eight (8) Deputies were injured (12%). Fire / Rescue treated three (3) Deputies on scene (2%); five (5) Deputies did not require or refused medical services (4%); 116 deputies were not injured (94%).

Three (3) Deputies responded to domestic violence calls for service (37.5%), one (1) Deputy attempted to serve a warrant (12.5%), one (1) Deputy responded to a battery (12.5%), one (1) Deputy responded to a CPR call (12.5%), one (1) Deputy responded to a motor vehicle crash (12.5%), and one (1) Deputy conducted a pedestrian stop at a block party (12.5%).



RACE, GENDER & AGE OF DEPUTIES INJURED IN LESS-LETHAL FORCE ENCOUNTERS

The breakdown of the Deputies injured is four (4) Caucasian males (50.0%), three (3) Hispanic males (37.5%), and one (1) Caucasian female (12.5%). The ages of the Deputies injured are: four (4) Deputies were between the ages of 25 – 34 (50.0%), three (3) Deputies were between the ages of 35 – 44 (37.5%), and one (1) Deputy was under 25 years of age (12.5%).

Figure 16:

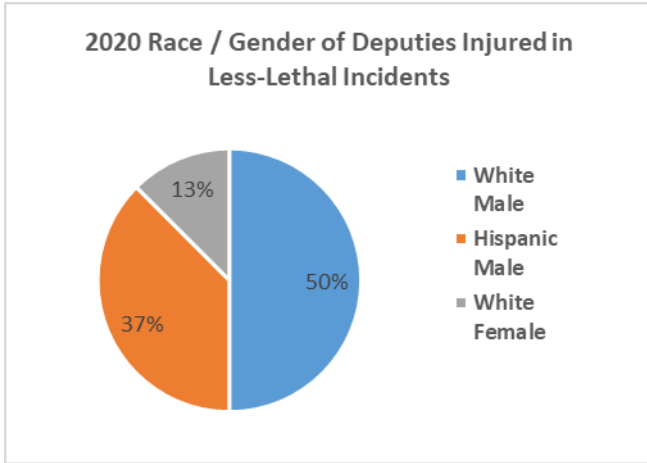
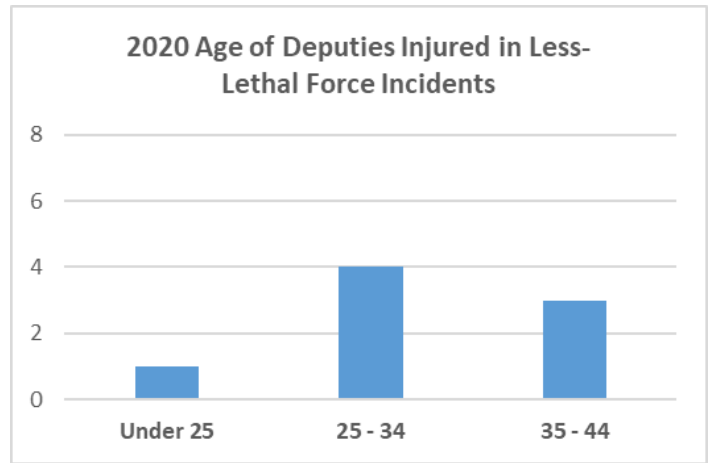


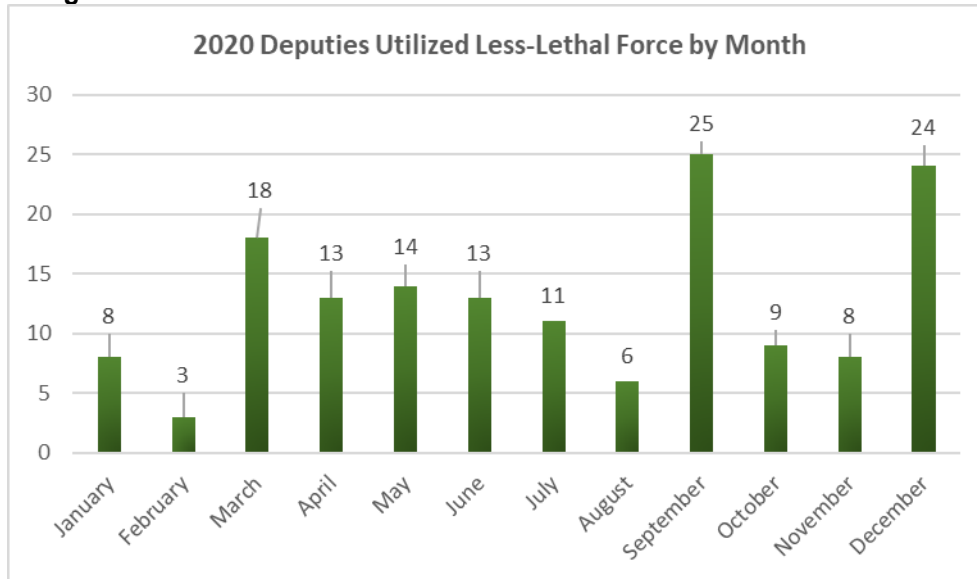
Figure 17:



DATE AND TIME LESS-LETHAL FORCE UTILIZED

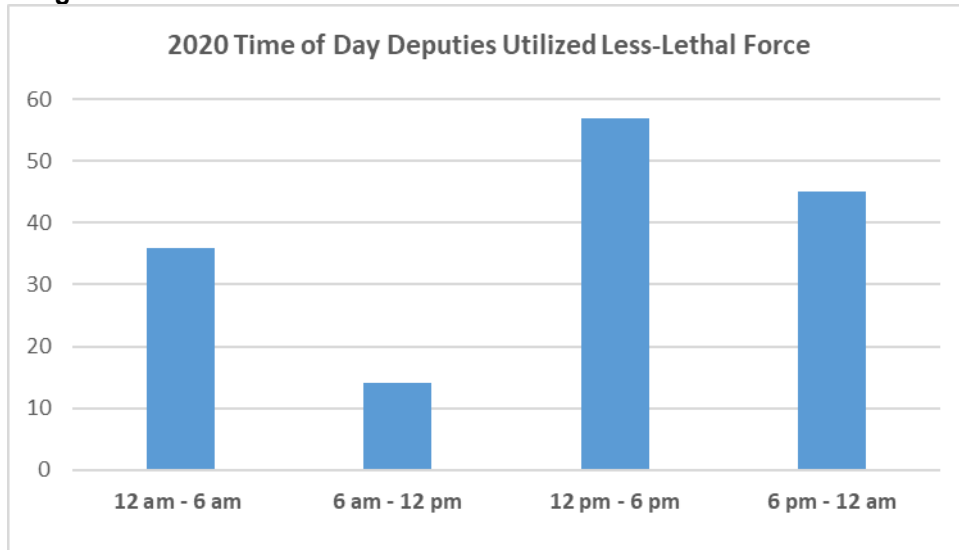
Deputies utilized less-lethal force on subjects: 8 times in January (5%), 3 times in February (2%), 18 times in March (12%), 13 times in April (9%), 14 times in May (9%), 13 times in June (9%), 11 times in July (7%), 6 times in August (4%), 25 times in September (16%), 9 times in October (6%), 8 times in November (5%), and 24 times in December (16%).

Figure 18:



Of the 152 uses of less-lethal force, 36 uses occurred between 12 am – 6 am (24%), 14 uses occurred between 6 am – 12 pm (9%), 57 uses occurred between 12 pm – 6 pm (37%), and 45 uses occurred between 6 pm -12 am (30%).

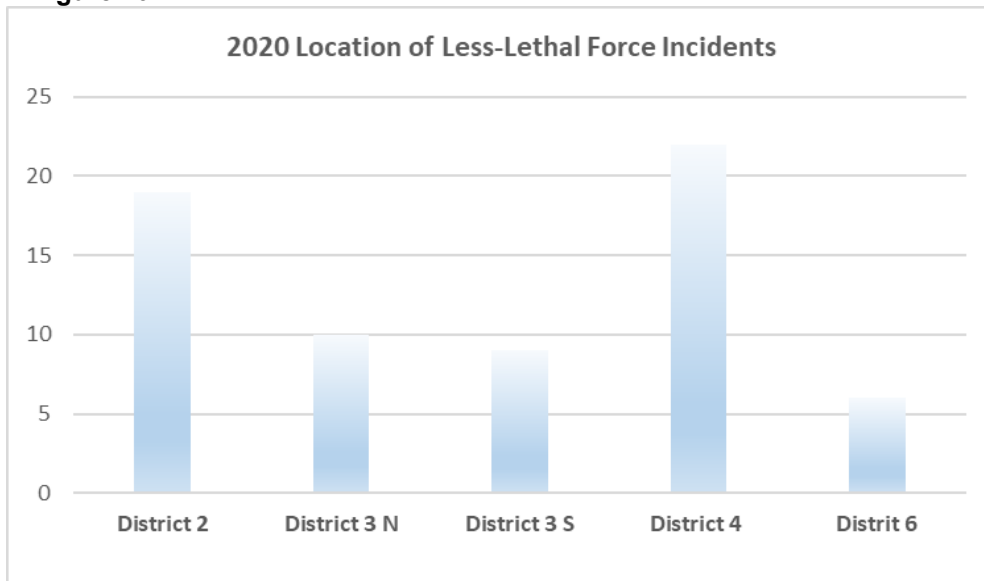
Figure 19:



LOCATION OF LESS-LETHAL INCIDENTS

Of the 66 incidents of less-lethal force, 19 incidents occurred in District 2 (29%), 10 incidents in District 3 N (15%), 9 incidents in District 3 S (14%), 22 incidents in District 4 (33%), and 6 incidents in District 6 (9%).

Figure 20:



2020 REVIEW OF USE OF FORCE POLICY AND PRACTICES:

Information Technology implemented updates to IAPro Blue Team in 2020. Internal Affairs indicates a vast improvement in reliability over the past system. In addition, this management software provides for collection of demographic data for subjects, which has not been feasible with the past system.

Volusia Sheriff's Office revised both its New Deputy Training and Deputy Training Officer programs to increase the training impact and field evaluation phase. This has received positive feedback and provides enhanced direction/coaching of new deputies.

The Volusia Sheriff's Office has also received approval from FDLE and CJSTC to begin basic law enforcement training for new Deputy Recruits at the Saboda Training Center in 2021.

Statistical data of index crime and number of arrests indicate dramatic reduction in both since 2017; however, in 2020 the number of use of force incidents and the number of deputies assaulted both increased slightly. This could be attributed to the civil unrest nationwide and public perception of law enforcement related to highly publicized incidents.

Since implementing the new training model beginning in 2017, and with continued emphasis and investment in the Guardian and de-escalation philosophies, the agency has seen a 43% decrease in the use of force incidents from 2017 overall, and 50% decrease in use of deadly force.

In June 2020, the agency revised Directive 1.1 Use of Force Guidelines prohibiting the use of any neck restraints in Use of Force. In July 2020, the definition of neck hold changed to include the term, chokehold.

Proactive promotion of the agency engaging with the community and the reduction in crime, continues to build trust and new partnerships with the community. This investment in the community is vital to engaging all segments of the community and especially crucial when highly emotional incidents/events occur. Social media as a tool continues to raise awareness and open doors for future opportunities.

- PURSUIT ANALYSIS ON FOLLOWING PAGE -

FIGURE #21: PURSUIT MATRIX

Incident	Time	Reason for Pursuit	Method of Termination	Result in Crash	Injuries/Hospital	Avg/Max mph	Total Distance miles/time	Violator Eluded/Arrested	Within Policy
20-3041 VP 20-001	02:15	Assist OBPD – Agg. Battery on LEO	Suspect's vehicle crashed Stop sticks 1	Yes	Yes / Yes	75 / 93.5	2.5 miles / 2 minutes	Yes / Yes	Yes
20-8178 VP 20-002	05:47	Abduction.	Suspect's vehicle crashed into another vehicle Stop sticks 2	Yes	Yes/ No, rescue	57.6 / 97	24 miles / 25 minutes	Yes / Yes	Yes
20-10650 / VP 20-003	18:58	Murder suspect	Crash	Yes	Yes, both defendant and the Detective	101.75 / 126.3	4.1 miles / 4 minutes 25 seconds	Yes / Yes	Yes
20-11524 / VP 20-004	00:25	Assist EPD shooting suspects	EPD terminated pursuit when driver identified.	No	No / No	? / 103.2 mph	5 miles / 3 minutes	Yes / No	No, Pursuit not authorized by supervisor.
20-13604 / 20-13607 VP 20-005	00:33	Agg. Assault with a vehicle on LEO	Supervisor terminated VSO (2) & LCSO deployed stop sticks	No	Yes, def. ingested unknown amount of meth	? / 113 mph	Over 10 miles / 19 minutes	Yes / Yes	No, Sgt. should not have authorized pursuit.
20-23793 / VP 21-001	18:50	Assist FCSO armed carjacking & agg. battery LEO	Deputy terminated	Yes	Yes / Yes (3 deaths, 2 injured)	104 / 120 mph	4.8 miles / 2 minutes 44 seconds	Yes / No deceased	Yes

PURSUIT REVIEW:

There were six (6) pursuits during 2020; supervisory and administrative reviews were well-documented providing good detail. Three (3) of the six (6) were initiated in assistance of other agencies (50%).

Upon administrative review, all pursuits were justified with the exception of VP 20-005, in which the sergeant authorized a pursuit in violation of the pursuit policy and VP 20-004, where a deputy initiated a pursuit without his supervisor's approval. In VP 20-005, the sergeant received a letter of reprimand and remedial training on VSO Directive 41.2 Motor Vehicle Apprehension.

In VP 20-004, the supervisor did not authorize a pursuit; deputy did not have radio on proper channel or fulfill secondary unit's responsibilities. After review by Internal Affairs, the deputy received roll call remedial training on VSO Directive 41.2 Motor Vehicle Apprehension.

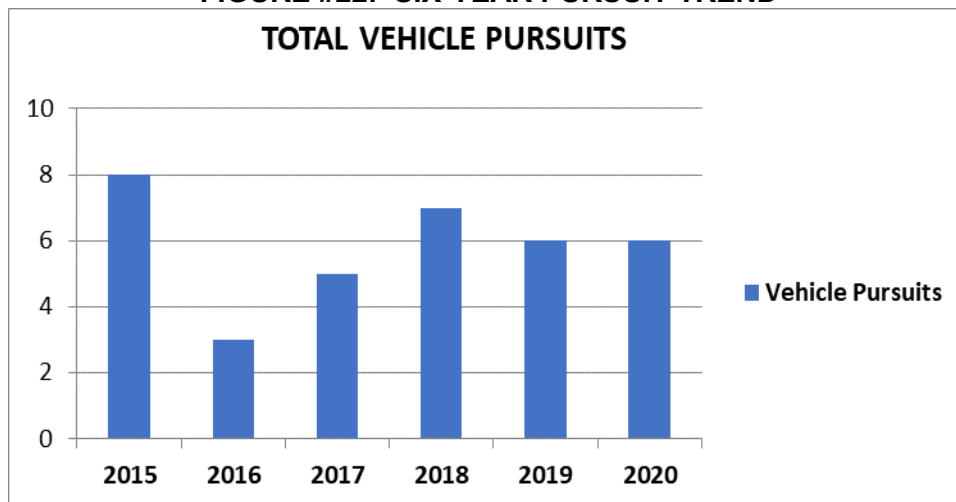
Stop Sticks - During 2020, Deputies deployed stop sticks five (5) times in support of planned tactical measures to terminate pursuits. In three (3) of the six pursuits, stop sticks were successfully deployed terminating the pursuits, with one (1) ending in the suspect vehicle crash and one (1) ending in a crash of the suspect's vehicle into another vehicle. In one (1) pursuit, Edgewater PD terminated the pursuit. In one (1) pursuit, the supervisor terminated the pursuit, and in the final pursuit, the Deputy terminated the pursuit due to the suspect's egregious driving becoming a danger to the deputies and public. Shortly thereafter, the suspect vehicle crashed into another vehicle killing himself, the driver and front seat passenger, and injured the two back seat passengers.

NOTE: Deputies also utilized 97 additional stop sticks in motor vehicle apprehensions in order to **prevent** escalation/engaging in active pursuits. Deputies deployed stop sticks in 56 incidents successfully preventing pursuits in 50 incidents (89%).

The below 6-year trend line 2015 - 2020 indicates an average of 5.8 pursuits/year.

Historical review for this period 2015 - 2020 reflects that of the 35 pursuits, 4 (11%) were found not in compliance with established policy.

FIGURE #22: SIX-YEAR PURSUIT TREND



REVIEW OF PURSUIT POLICY AND PRACTICES:

Review of agency policy and practices indicates good use of additional resources such as Air One, K-9 and support vehicles. Primary and support vehicles are functioning in their proper roles.

The agency trains all sworn officers in emergency vehicle operations, roadblocks and stop sticks. Only Deputies, who have demonstrated PIT proficiency after receiving competency-based training from PIT certified driving instructors, are authorized to initiate the technique.

Supervisory and administrative reviews are being conducted and documented in accordance with policy and forwarded through chain-of-command. As with all incidents involving pursuits, Command Staff conducts final review for justification and policy adherence as presented by Internal Affairs.

In addition to review of all pursuits, the agency conducts administrative reviews through chain of command on all motor vehicle apprehensions as a precautionary measure to ensure established procedures are being followed and that law enforcement response does not elevate to “pursuit mode” in violation of policy. This review facilitates the early detection of potential training needs, ensures continued deputy safety, and preserves the intent of policy and integrity of practice. Documented progressive discipline is utilized when needed.

Overall, the combination of strict pursuit guidelines, training, supervisory authorization and review, and professional deputy restraint continue to keep the number of pursuits to minimum numbers. In addition, the supervisory authorization and the review process itself adds a level of accountability and an evaluation element to each incident, which re-enforces the practice of individual professional restraint. This review process also provides a means to address any policy issues in a timely manner to ensure that practice continues to reflect procedure; no change to policy was required during this review period.

Professional Compliance Unit
April 12, 2021