

Policy Recommendations

Nine policy recommendations to improve data collection, conduct ongoing analysis, ensure systems of accountability, and address racial disparities.

1. **Re-establish the police stop analysis and early warning system.**

The City of Cincinnati used to have a traffic stop analysis and early warning system installed by RAND in 2007, up until 2012, that was discontinued by the Police Chief due to budget cuts. [Efforts were made in 2017](#) by Harry Black, City Manager at the time, to restore the system under the Office of Performance & Data Analytics (OPDA), but they were unsuccessful.

The re-establishment of an early warning system should also include pedestrian stops, which the data shows have higher racial disparity rates than traffic stops.

Note: 2012 was the closest traffic stop rates came to parity (a 1.29x disparity) in the seventeen years of data Campaign Zero analyzed.

2. **Revitalize the community's oversight of police problem solving.** Previously, the [Manager's Advisory Group](#) was designed to ensure accountability and collective problem solving. The group, which last met in 2021, monitored key performance indicators related to the goals of the Collaborative Agreement.

Problematic policing outcomes can persist when decision-making is not transparent to the public and subject to oversight.

3. **End policing of misdemeanors that do not impact public safety.** Many everyday occurrences have been criminalized and are disproportionately used to stop Black people at higher rates than White people. The city should remove public nuisance violations from city code that do not impact public safety.

A nonexhaustive list includes:

Pedestrians

Jaywalking ([R.C. 4511.50](#), CMC [506-46.47](#))

Loitering ([CMC 510-9](#), [CMC 910-21](#))

Spitting in a public place (CMC [601-17](#), [1601-27](#))

Vehicles

Window tint ([R.C. 4513.241](#))

For those offenses that are also included in state law, police should utilize their discretion and draft policy to enforce them only in extreme circumstances.

Policy examples from other cities include: [San Francisco Police](#) and [Ann Arbor Police](#).

4. Amend [Policy 15.101 - Bias Free Policing](#) to implement a discipline program for officers and supervisors with racially disparate policing records.

According to Section 13.01 of the [Manual of Rules and Regulations and Disciplinary Process for the Cincinnati Police Department](#), any member may be dismissed from the Department when proven guilty of immoral conduct, neglect of duty, failure of good behavior, or discourteous treatment of the public.

We encourage city leaders to implement a strict disciplinary policy for any officers making racially disparate stops.

5. Address task force policing disparities.

Task force stops account for roughly 3% of all stops but have the highest disparities observed in the data. Taken in aggregate, **task forces stop Black people 6.3x more often than White people**. The three task forces with the highest disparities are Violent Crimes (28x), Crime Gun Intelligence Center (CGIC, 17.3x), and Place-Based Investigations of Violent Offender Territories (PIVOT, 17x). These numbers are striking.

There should be an explicit strategy to audit and address the task force policing strategies, by task force, to better understand their actions, the results of their presence, and to address the disparities that are clear and present in the data.

6. Develop a clear policy permitting anonymous complaints against police officers. Section 2.16 of the [Manual of Rules and Regulations and Disciplinary](#)

[Process for the Cincinnati Police Department](#) recognizes anonymous complaints as legitimate citizen complaints to be filed. However, Section 9.05 notes that the name of the citizen will be placed in the blotter by Cincinnati Police Department staff.

It is important to clarify existing policy, processes, and forms to affirm the right for anonymous complaints to be filed and acted upon.

7. **Contact Card Improvements**

a. **Make all Contact Card data available on the public portal.**

All contact card data must be made available by the Office of Performance & Data Analytics on the [Cincinnati Open Data Portal](#) public database and updated monthly (at a minimum). This includes historical data from 2001-2008, which was shared with researchers at the University of Cincinnati and RAND to conduct Collaborative Agreement reports but that is not currently available on the portal.

b. **A comprehensive report analyzing contact card data must be performed annually by an independent body, submitted to the City Council, and made available to the public.**

At a minimum, the report should analyze racial disparities in:

- Stop rates, including pedestrian vs. motor vehicle stops
- Geography, including variation across neighborhoods
- Frisks and searches
- Reason for the stop
- Stop outcomes, including warnings, citations, arrests, and no action
- Use of force
- Variation across police officers

The report should also analyze disparities across demographic groups including age and gender. The report must include the names of the top 10 officers with the most racially disparate stops.

Note: Any analysis where city officials and police leadership influence the methodology is not independent. This report must use population as one of the research benchmarks to understand disparities as a whole, before trying to explain why they exist.

- c. **Enforce police officers' requirement to fill out contact cards completely.** CPD [Procedure 12.554](#), a binding directive under [Procedure 10.000](#), states that a "Contact Card must be **completed** any time an officer stops a motor vehicle or conducts an inquiry of individuals in a stopped motor vehicle" and for any vehicle passenger or pedestrian detention meeting the definition of a Terry stop. In both cases, the operative word is "completed." Despite this, several fields contain missing or blank entries, making it impossible to distinguish between non-occurrence and non-compliance. For example, the use of force field contains explicit "no" entries and thousands of blank rows. If "no" is the correct response when no force was used, then blank entries represent incomplete contact cards in violation of Procedure 12.554.

CPD Procedure 12.554. already requires supervisors to review and approve all contact cards and requires Police Records to return incomplete cards to the officer for correction. The prevalence of blank and missing fields indicates this process is not being consistently followed. Supervisors who approve incomplete cards should be flagged in audits and held accountable for their unit's compliance rates.
- d. **Regular audits to ensure contact card completeness should be scheduled and reported publicly to ensure compliance.** [Procedure 15.101](#) already requires that the "Inspections Section will conduct a documented annual review related to this policy including agency practices, data collected, and citizens' concerns." That review should include a field-level completeness audit, with findings reported publicly.
- e. **Require standardized data processing for all categorical contact card fields.** Several categorical fields contain multiple variants of the same value, indicating inconsistent processing of entries when contact card data is uploaded to the database. CPD should ensure that all categorical fields are processed and coded consistently by merging duplicant or variant entries into standardized categories. Existing records should be retroactively cleaned to resolve these inconsistencies and improve the quality of the data.
- f. **Publish and maintain a complete public data dictionary for all contact card fields.** The [Cincinnati Open Data Portal](#) lists contact card fields and their data types, but leaves the Description column blank for every field. CPD must fill in those descriptions and define the meaning of

every categorical value used in the dataset, including legal terms that may not be widely understood. For example, the data dictionary should explain what a capias warrant is, what constitutes an inventory search, and how different stop reasons are defined so that researchers and the public can accurately interpret and use the data. The data dictionary should be updated any time field definitions or coding practices change.

- g. **Audit contact card coverage against CAD logs to ensure every required stop is documented.** Because every traffic stop requires officers to radio dispatch, CPD's Computer-Aided Dispatch (CAD) logs provide an independent record against which contact card submissions can be verified. RAND's annual evaluations used this method and found persistent gaps: in 2004, an estimated 20% of stops had no contact card; by 2007 that figure was 5% (2,971 stops); and by 2008 it was 1.7% (1,004 stops). CPD should conduct and publicly report an annual audit comparing CAD records to contact card submissions for transparency and accountability.
 - h. **Improve geocoding of stop locations.** Many contact cards have missing or incorrect latitude/longitude coordinates. Corrected locations will help CPD and researchers more easily assess neighborhood- and block-level patterns.
8. **Remove problematic provisions from the Cincinnati police union contract.** Campaign Zero's Nix the 6 is the most comprehensive analysis of police union contracts in the United States. This campaign focuses on six clauses that limit accountability and/or prevent community oversight.

In Cincinnati, there are two major provisions that have been identified as barriers to accountability:

- a. There are no records of discipline for police officers and/or supervisors that are permanently maintained in their employee file. At identified intervals, records of discipline are removed and/or destroyed.
- b. There is a 3 year statute of limitations from the date of an incident that prevents the City from imposing discipline on an officer, even if the allegations are later found to be true.

Read [our full analysis](#) of the Cincinnati Police Union contracts.

9. **Implement all use of force policy recommendations from 8 Can't Wait.**

Cincinnati Police's Use of Force Policy currently only has 3 of the 8 policy recommendations from [8 Can't Wait](#), Campaign Zero's flagship campaign.

The five missing provisions are:

- a. **Ban Neck Restraints** in all cases. The current policy only bans chokeholds, not all neck restraints (i.e. carotid restraints). Allowing officers to use neck restraints that block air (chokehold) or blood flow (carotid/vascular restraint) results in unnecessary death or serious injury. Policies must clearly ban both types of restraints.
- b. **Require a Warning Before Deadly Force is Used** in all situations.
- c. **Require Officers to Exhaust All Alternatives Before Using Deadly Force**, including non-force and less lethal force options.
- d. **Implement a Robust Use of Force Continuum** that restricts the most severe types of force to the most extreme situations and demonstrates clear, proportional responses to levels of resistance.
- e. **Require Comprehensive Reporting** each time an officer uses force or threatens to use force against civilians, including whenever they point a firearm at someone, in addition to all other types of force.

We previously reviewed the Use of Force policy in 2021 and made recommendations for revisions of four policy levers. Our recent review shows that these four levers were not revised to meet our standard.

Read [our full analysis](#) of Cincinnati's Use of Force Policy.