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|-------|---|--------------|
| Title | Banning Police Department | 06/30/2023 |
| | by Brandon Smith in Organized Retail Theft Prevention Grant Program | id. 41280066 |
| | bsmith@banningca.gov | |

Original Submission 06/30/2023

The Organized Retail Theft (ORT) Prevention Grant Program Application is divided into five (5) sections as identified below: Background Information Contact Information Program Information Proposal Narrative and Budget Mandatory Attachments Each section has a series of questions requiring a response. Applicants will be prompted to provide written text, select options from a drop down menu, select options from a multiple choice menu, or upload attachments. Questions with a red asterisk require responses. Applicants will not be able to submit the application until all questions with a red asterisk have been completed. Applicants may reference the ORT Prevention Grant Program Proposal Instruction Packet for background information, key dates, rating factors, and other important information to aid in the completion of the ORT Prevention Grant Program Application. The ORT Prevention Grant Proposal Instruction Packet is available on the Board of State and Community Corrections (BSCC) website. NOTE: Applicants may start and stop their application but must select "Save Draft" at the bottom of the application before existing.

SECTION I - BACKGROUND INFORMATION This section requests information about the applicant's name, location, mailing address, and tax identification number.

Name of Applicant Banning Police Department
(i.e., Police Department, Sheriff's Department, or Probation Department)

Multi-Agency Partnerships Information (if applicable) Applicants may apply for funding as part of a multi-agency partnership (two [2] or more agencies). The agencies and jurisdictions comprising the collaborative application are not required to be contiguous. One (1) Lead Public Agency must be identified on behalf of the partnership.

Multi-Agency Partnerships No: This is not a Multi-Agency Partnership Application

Lead Public Agency Information **All applicants are required to designate a Lead Public Agency (LPA) to serve as the coordinator for all grant activities. The LPA is a governmental agency with local authority within the applicant's city or county. The applicant may choose to fill the role of LPA itself or it may designate a department, agency, or office under its jurisdiction to serve as the LPA. The role of the LPA is to coordinate with other local government agency partners and non-governmental organizations to ensure successful implementation of the grant program. The LPA is responsible for data collection and management, invoices, meeting coordination (virtual and/or in-person), and will serve as the primary point of contact with the BSCC.**

Lead Public Agency **Banning Police Department**

Applicant's Physical Address **125 E. Ramsey Street
Banning
CA
92220
US**

Applicant's Mailing Address (if different than the physical address) **PO Box 1177
Banning
CA
92220
US**

Mailing Address for Payment **PO Box 1177
Banning
CA
92220
US**

Tax Identification Number **95-6000674**

SECTION II - CONTACT INFORMATION **This section requests contact information for the individuals identified as the Project Director, Financial Officer, Day-to-Day Project Contact, Day-to-Day Fiscal Contact, and the Authorized Signature.**

Project Director **Jeff
Horn**

Project Director's Title with Agency/Department/Organization **Captain, Acting Chief of Police**

Project Director's Physical Address **125 E. Ramsey Street
Banning
CA
92220
US**

Project Director's
Email Address **jhorn@banningca.gov**

Project Director's
Phone Number **+19518491194**

Financial Officer **A'ja
Wallace**

Financial Officer's
Title with
Agency/Department/Organization **Deputy Finance Director**

Financial Officer's
Physical Address **99 E. Ramsey Street
Banning
CA
92220
US**

Financial Officer's
Email Address **awallace@banningca.gov**

Financial Officer's
Phone Number **+19519221642**

Day-To-Day Program
Contact **Brandon
Smith**

Day-To-Day Program
Contact's Title **Lieutenant**

Day-To-Day Program
Contact's Physical
Address **125 E. Ramsey Street
Banning
CA
92220
US**

Day-To-Day Program
Contact's Email
Address **bsmith@banningca.gov**

Day-To-Day Program
Contact's Phone
Number **+19518491633**

Day-To-Day Fiscal
Contact **Cornelio
Datuin Jr**

Day-To-Day Fiscal
Contact's Title **Accountant II**

| | |
|--|--|
| Day-To-Day Fiscal Contact's Physical Address | 99 E. Ramsey Street Banning CA 92220 US |
| Day-To-Day Fiscal Contact's Email Address | cdatuin@banningca.gov |
| Day-To-Day Fiscal Contact's Phone Number | +19519222663 |
| Name of Authorized Officer | Jeff Horn |
| Authorized Officer's Title | Captain, Acting Chief of Police |
| Authorized Officer's Physical Address | 125 E. Ramsey Street Banning CA 92220 US |
| Authorized Officer's Email Address | jhorn@banningca.gov |
| Authorized Officer's Phone Number | +19518491194 |
| Authorized Officer Assurances | checked |
| SECTION III - PROGRAM INFORMATION | This section requests a Project Title, Proposal Summary description, Program Purpose Area(s) selection, and Scope Funding Category selection. |
| Project Title | Banning Police Department Flock Safety Automated License Plate Reader (ALPR) Camera Plan to Combat Organized Retail Theft |
| Proposal Summary | The Banning Police Department has identified a need to combat organized retail theft, vehicle theft/vehicle part theft, and cargo theft within the City of Banning. The Banning Police Department looks to procure 20 Flock Safety Falcon ALPR cameras to be deployed throughout the city. The cutting-edge technology will be used as an investigative tool and criminal deterrent, to help protect the businesses, citizens, and visitors to the city from theft. The following will detail the Banning Police Department's plan to reduce organized retail theft incidents, minimize the financial losses to retailers, and enhance collaboration between retailers and law enforcement. |

**PROGRAM
PURPOSE AREAS**

Applicants must propose activities, strategies, or programs that address the Program Purpose Areas (PPAs) as defined on pages 5 - 8 in the ORT Prevention Grant Proposal Instruction Packet. A minimum of one (1) PPA must be selected; applicants are not required to address all three (3) PPAs. All proposed activities, strategies, or programs must have a link to the ORT Prevention Grant Program as described in the authorizing legislation and the ORT Prevention Grant Proposal Instruction Packet.

**Program Purpose
Areas (PPAs):**

**PPA 1: Organized Retail Theft
PPA 2: Motor Vehicle or Motor Vehicle Accessory Theft
PPA 3: Cargo Theft**

**Funding Category
Information**

Applicants may apply for funding in a Medium Scope OR Large Scope Category. The maximum an applicant may apply for is up to \$6,125,000 in the Medium Scope category OR up to \$15,650,000 in the Large Scope category. Applicants may apply for any dollar amount up to and including the maximum grant amount identified in each category. Multi-agency partnerships (determined as Medium Scope OR Large Scope) may apply for up to the maximum grant award in that category, multiplied by the number of partnering eligible applicants. For Example: Four (4) eligible applicants in the Medium Scope category may submit one (1) application for up to \$24,500,000 o \$6,125,000 (Medium Scope Max) x 4 (# of Agencies) = \$24,500,000 Two (2) eligible applicants in the Large Scope category may submit one (1) application for up to \$31,300,000 o \$15,650,000 (Large Scope Max x 2 (# of Agencies) = \$31,300,000 Please reference pages 10-12 in the ORT Prevention Grant Proposal Instruction Packet for additional information.

Funding Category

Medium Scope (Up to \$6,125,000)

**SECTION IV -
PROPOSAL
NARRATIVE AND
BUDGET**

This section requests responses to the Rating Factors identified in the the ORT Prevention Grant Program Application Instruction Packet.

The Proposal Narrative must address the Project Need, Project Description, Project Organizational Capacity and Coordination, and Project Evaluation and Monitoring Rating Factors as described in the ORT Prevention Grant Instruction Packet (refer to pages 20-24). A separate narrative response is required for each Rating Factor as described below: The Project Need narrative may not may not exceed 6,711 total characters (includes punctuation, numbers, spacing and any text). In Microsoft Word, this is approximately three (3) pages in Arial 12-point font with one-inch margins on all four (4) sides and at 1.5-line spacing. The Project Description narrative may not may not exceed 11,185 total characters (includes punctuation, numbers, spacing and any text). In Microsoft Word, this is approximately five (5) pages in Arial 12-point font with one-inch margins on all four (4) sides and at 1.5-line spacing. The Project Organizational Capacity and Coordination narrative may not may not exceed 4,474 total characters (includes punctuation, numbers, spacing and any text). In Microsoft Word, this is approximately two (2) pages in Arial 12-point font with one-inch margins on all four (4) sides and at 1.5-line spacing. The Project Evaluation and Monitoring narrative may not may not exceed 4,474 total characters (includes punctuation, numbers, spacing and any text). In Microsoft Word, this is approximately two (2) pages in Arial 12-point font with one-inch margins on all four (4) sides and at 1.5-line spacing. A character counter is automatically enabled that shows the number of characters used and the remaining number of characters before the limit for each response is met. If the character limit is exceeded, a red prompt will appear with the message "You have exceeded the character limit". Applicants will be prohibited from submitting the ORT Prevention Grant Program Application until they comply with the character limit requirements. NOTE: It is up to the applicant to determine how to use the total word limit in addressing each section, however as a guide, the percent of total point value for each section is provided in the ORT Prevention Grant Proposal Instruction Packet (refer to page 15).

Project Need

The City of Banning is an approximately 23 square mile incorporated city in Riverside County. The City of Banning is strategically located along the Interstate 10 Freeway in the San Gorgonio Pass. As of the 2020 US Census Data, Banning had a daily population of 29,505 with a median household income of \$46,834 compared to the California average of \$84,907. This population continues to grow rapidly with new homes and businesses getting built daily and has a current estimated population of 31,847. According to the California Department of Finance, in 2020 the City of Banning was named the fastest growing city in California with a population of at least 30,000. The City of Banning is also home to the Larry Smith Correctional Facility, which is the largest adult detention center in Riverside County, and the Banning Justice Center. Both facilities bring an influx of visitors to the City of Banning, as well as jail releases into the city that cause an increase in local crime from out of area residents.

The implementation of Flock automated license plate reader (ALPR)

cameras will enable the Banning Police Department and other regional law enforcement agencies and retailers to identify and apprehend organized retail theft groups and individuals efficiently. The City of Banning does not currently have any ALPR cameras within its jurisdiction. By combining cutting-edge technology with collaboration between retailers and law enforcement, we aim to create a robust prevention system that will significantly deter and reduce organized retail theft incidents. Organized retail theft has become a pervasive issue in our society, leading to significant financial losses for retailers, increased prices for consumers, and potential safety risks.

With rapid growth in communities there often is the unintended consequence of more criminal activity. With many new houses being developed in the city, particularly in the new community of Atwell on the City's west side, where there have been 40 burglaries/grand thefts from January 2020 to June 2023. These thefts involved the organized theft of hundreds of thousands of dollars in building materials and equipment.

The City of Banning is heavily impacted by the Interstate 10 that runs through the center of the city. The Interstate 10 is a main thoroughfare for local and interstate travel and commerce. Most of the commercial properties within the City of Banning are positioned with quick access on and off the Interstate 10. The positions of these businesses make them a frequent target of retail theft given the ease of a quick getaway. The Banning Police Department looks to utilize the Organized Retail Theft Prevention Grant Program to purchase and maintain valuable pieces of technology in the form of Flock ALPR to help develop investigative leads in theft cases where vehicles are used in the commission of the theft.

The City of Banning also has two train tracks that are owned by the Union Pacific Railroad which run the length of the city from east to west. For various reasons trains travelling through the City of Banning often stop on the tracks within the city limits. Trains carrying consumer goods, automobiles, and various other items (including FedEx and UPS shipments) become easy targets for thieves. In the past when large thefts have occurred from trains in the area, the stolen items are removed from the train and staged along the tracks for vehicles to pick up either along the freeway or by using access roads on either side of the tracks. Because of staffing shortages with the Union Pacific Railroad Police, the Banning Police Department has handled some of those theft investigations involving trains in the area. In the past two years two of those events the Banning Police Department took reports due to Union Pacific Police not being available at the time. During those two specific incidents (Cases 22-735 and 22-2059) nearly \$6,000.00 in stolen cargo was recovered and in each incident three subjects were arrested working together in the thefts. Due to lowered penalties statewide for theft related crimes the frequency of thefts from trains has increased over the past few years. With ALPRs strategically positioned around the city in areas accessible to the railroad tracks (also happen to be many areas with

freeway access) the Banning Police Department hopes to develop investigative leads that will help officers identify suspects and or groups of suspects involved in these thefts.

Along with goods being moved and target on local trains, there are many goods being moved utilizing the commercial trucking industry. Along with a population growth in the City of Banning, there has also been growth in the commercial industry as well. Sketchers has recently leased a newly developed 1 million square foot warehouse in the city and Estes Express Transportation has a new 63,000 square foot facility near Sketchers. These two large trucking and shipping facilities will greatly increase the commercial trucking traffic through the City of Banning. The goods being transported will become targets of thieves in the area. A Flock ALPR system throughout the city will help deter thieves and help law enforcement identify and apprehend those responsible for thefts.

The City of Banning is also greatly affected by a large homeless population who are frequently involved in thefts at local retail businesses, in train burglaries, and automobile thefts/tampering. While the City of Banning has developed a designated site for some of the eligible homeless population, many set up residence amongst the retail businesses and along the area between the Interstate 10 and the railroad tracks. While many of the local homeless are not frequently utilizing vehicles, they are using roadways and ingress and egress points that would be covered by the proposed Flock camera system and motion activation caused by passing vehicles will often capture pedestrians in the area as well to help in suspect identification.

Over the past three years the Banning Police Department has had a high number of calls for service related to various theft related incidents. The Banning Police Department utilizes Sun Ridge Systems RIMS for its computer aided dispatch and records keeping. From 2021 to 2022 the Banning Police Department has seen a 37% increase in calls for service related to retail petty thefts (Penal Code 459.5 violations). In that same period there has also been an increase of 71% in calls for service related to transient disturbances, which are often related to the disruption of or theft from local businesses. From January 2020 to June 2023, the Banning Police Department has taken 509 stolen vehicle reports.

Project Description

The Banning Police Department's primary goal is to implement a comprehensive system for organized retail theft prevention utilizing 20 Flock ALPR cameras strategically placed throughout the city at all ingress and egress locations. Covering all ingress and egress locations will allow Banning Police Department officers to effectively investigate retail theft incidents. This system will provide real-time identification of vehicles associated with known or suspected retail theft incidents, enabling law enforcement agencies to respond promptly and apprehend offenders. By deterring organized retail theft, we aim to safeguard the interests of retailers and create a safer environment for both employees and customers.

The three goals that will be a focus of achieving the overall goal of the program are as follows:

Goal 1: Reduction in organized retail theft incidents

Objectives:

- Identify the number of reported organized retail theft incidents before and after the implementation of the Flock Automated License Plate Reader cameras.
- Comparison of the average monthly or annual incidents pre- and post- implementation.
- Demonstrable decrease in the number of reported organized retail theft incidents.
- Percentage reduction in organized retail theft incidents.

Goal 2: Minimization of financial losses for retailers

Objectives:

- Financial data analysis, comparing the total financial losses incurred by retailers pre- and post-implementation of the strategy.
- Comparison of the average monetary losses per incident before and after the implementation.
- Measurable decrease in financial losses for retailers.
- Percentage reduction in financial losses attributed to organized retail theft.

Goal 3: Enhanced collaboration between retailers and law enforcement

Objectives:

- Number of collaborative initiatives established, such as information sharing platforms, or regular meetings.
- Participation rate of retailers and law enforcement personnel in training programs and workshops.
- Improved communication and collaboration between retailers and law enforcement agencies.
- Enhanced exchange of information intelligence related to organized retail theft.
- Timely and effective response to organized retail theft incidents due to improved coordination.

A message from Flock Safety:

"Flock Safety is a Public Safety Operating system that is currently working with over 200 agencies across California (and over 2800 nationwide). Flock uses machine learning technology to capture the Vehicle Fingerprint™ and enable you to search for a vehicle by body type, make, color, and unique vehicle identifiers like top rack, back rack, etc. There are over 3500+ Flock ALPR cameras in Southern California alone and they are used on a daily basis to solve Auto Theft, Organized Retail Crime, Commercial/Residential Burglaries & Part 1 crimes. San Marino PD, over the course of a year, saw burglaries go down by 70% & Part 1 crimes by 19%, after the implementation of Flock. We plan on using Flock cameras to assist in the investigation of Organized Retail Crime, Auto Theft, and Cargo

Theft around the City of Banning."

Project Components:

1) Flock Automated License Plate Reader Cameras: We will procure and install a network of 20 Flock automated license plate reader cameras strategically positioned in high-traffic areas used for ingress and egress in the City of Banning, such as Interstate 10 on and off-ramps and commercial zones. These cameras use advanced optical character recognition (OCR) and machine learning algorithms to capture license plate information accurately and relay it to a centralized database.

2) Data Integration and Analysis: We will develop a robust data integration and analysis system that integrates the captured license plate information with law enforcement databases, retailer incident reports, and real-time analytics. This system will generate actionable insights, such as identifying patterns, hotspots, and suspect vehicles associated with organized retail theft.

3) We will facilitate collaborative efforts between retailers, law enforcement agencies, and community organizations to share information, insights, and best practices for preventing organized retail theft. Additionally, we will conduct briefing trainings for law enforcement personnel to ensure the effective utilization of the Flock ALPR cameras. To foster public awareness and engagement, we will launch a comprehensive public awareness campaign through various media channels. This campaign will educate the public about the consequences of organized retail theft, the role of the Flock ALPRs in prevention and investigations and encourage the reporting of thefts and other suspicious activity.

4) The proposed project will be implemented over a period of 44 months, as outlined below:

- **Month 1-4:** ORT Prevention Grant acceptance. Procurement and installation of Flock ALPR cameras
- **Month 5-8:** Collaboration and training programs for retailers, citizens, and law enforcement. Public awareness campaign planning and execution
- **Month 9-29:** Ongoing monitoring, evaluation (data collection), and improvement of the system
- **Month 30-36:** Data analysis and evaluation period to analyze data gathered during the service
- **Month 39-44:** Project wrap-up and end of project reports

5) The Banning Police Department currently uses Lexipol for its department policies and procedures manual. As the Banning Police Department does not currently utilize surveillance technology as proposed in this request for proposal (RFP), we will be looking to Lexipol for the current and up-to-date policies related to the use of such technology. Any policies implemented on this topic will comply with all applicable privacy laws/regulations regarding the surveillance

technology use and the securing and use of any data collected or stored.

6) The Banning Police Department currently uses Lexipol for its department policies and procedures manual. Banning Police Department Policy 401 details the department's stance and expectations regarding bias-based policing to comply with all applicable laws/regulations.

“401.2 POLICY - The Banning Police Department is committed to providing law enforcement services to the community with due regard for the racial, cultural, or other differences of those served. It is the policy of this [department/office] to provide law enforcement services and to enforce the law equally, fairly, objectively and without discrimination toward any individual or group.”

The Banning Police Department currently has 36 fully funded sworn police officer positions within the City of Banning (32 staffed as of July 2023), which includes Police Administration (Chief, Captain, and 3 Lieutenants), 15 assigned to patrol, 5 assigned as Detectives, 3 assigned as School Resource Officers, 1 assigned as a Probation Accountability Compliance Team (PACT) member, 1 assigned as a Homeless Liaison Officer, 1 assigned to the regional auto theft task force (RAID), and 1 assigned to the regional Gang Task Force.

To implement and administer the project described in this RFP the Banning Police Department will rely on well trained and fully dedicated staff members from the department and City of Banning to ensure success between the department and the State of California Board of State and Community Corrections. Both the Banning Police Department and City of Banning Finance team have prior experience implementing and managing grant programs from the State, Federal and local level, including for Homeland Security funds and Probation Accountability and Compliance Team/AB 109 funds. The Banning Police Department will have a Captain acting as the overall project director and final decision maker for the program. A Lieutenant will be the day-to-day program contact and will ensure all aspects of the proposed project are implemented as intended. The Lieutenant will be monitoring the procurement and deployment of Flock ALPR cameras. The same Lieutenant will coordinate with Flock Safety to ensure all staff members are well trained on the use of the new equipment and the collection of data from the system. Various Sergeants within the Banning Police Department will be assisting in data collection to be reported to the Lieutenant running the program.

City of Banning staff members including two Accountant II positions and a City Grant Manager will be assisting with financial oversight of the project and funds provided by this grant.

At this time the Banning Police Department does not see the need to have any other partner agencies involved in the project.

The Banning Police Department will be compiling data related to the success of the project and will be presenting that data to the Banning City Council and city management to ensure that the yearly costs associated with Flock ALPR cameras is incorporated into the annual budget for the department or other funding sources are developed for the program moving forward.

To ensure the project's success, we will conduct regular evaluations throughout its implementation. Key performance indicators (KPIs) will be established to measure the effectiveness of the Flock automated license plate reader cameras, the reduction in organized retail theft incidents, and the overall impact on retailers' bottom line. Evaluation reports will be shared with the granting organization and other stakeholders to promote transparency and accountability.

The Banning Police Department Captain will oversee all aspects of

the overall grant project. A Lieutenant will oversee the entire program over the duration of the grant cycle, including procurement of equipment, collaboration and training, data collection, and data analysis. Banning Police Department watch commanders (Sergeants) will be trained to identify and document the incidents in which Flock ALPRs are utilized to ensure proper data collection methods are used. Banning Police Department Records Technicians will be assisting in data collection and organization for input into progress reports.

The preliminary plan for monitoring the project and collecting and analyzing data is as follows:

1. Pre- and Post-Implementation Data Collection: Before implementing the organized retail theft prevention strategy utilizing Flock automated license plate reader cameras, baseline data will be collected on various parameters, including the number of organized retail theft incidents (retail thefts, motor vehicle thefts, motor vehicle part thefts, cargo thefts), financial losses incurred by retailers/victims, and the frequency of law enforcement interventions. This pre-implementation data will serve as a benchmark for comparison with post-implementation data.

2. Quantitative Data Analysis: The quantitative analysis will focus on examining the impact of the implemented strategy on key performance indicators (KPIs). This analysis will involve comparing the pre- and post-implementation data to assess changes in the following metrics:

a) **Reduction in Organized Retail Theft Incidents:** The number of reported organized retail theft incidents will be analyzed to determine if there has been a significant decrease following the implementation of the strategy.

b) **Financial Losses:** The financial impact of organized retail theft on retailers will be assessed by comparing the pre- and post-implementation financial data. This analysis will help determine if the strategy has effectively reduced financial losses.

c) **Law Enforcement Interventions:** The frequency and effectiveness of law enforcement interventions in response to organized retail theft incidents will be evaluated. This analysis will assess if the strategy has improved the speed and efficacy of law enforcement actions.

3. Qualitative Data Collection: In addition to quantitative analysis, qualitative data will be collected to gain insights into the experiences, perceptions, and feedback of key stakeholders, including retailers, law enforcement personnel, and community members. This data will be collected through interviews, focus groups, and surveys, allowing for a deeper understanding of the strategy's impact and any potential challenges or areas for improvement.

By combining quantitative and qualitative research methods, the research design will provide a comprehensive assessment of the strategy's outcomes. It will offer insights into the reduction of

organized retail theft incidents, financial losses, and the overall effectiveness of the Flock automated license plate reader cameras in preventing and deterring organized retail theft. The findings will inform future strategies and allow for continuous improvement in combating organized retail theft.

Budget Instructions

Applicants are required to submit a Proposal Budget and Budget Narrative (Budget Attachment). Upon submission the Budget Attachment will become Section 5: Budget (Budget Tables & Narrative) making up part of the official proposal. The Budget Attachment must be filled out completely and accurately. Applicants are solely responsible for the accuracy and completeness of the information entered in the Proposal Budget and Budget Narrative. The Proposal Budget must cover the entire grant period. For additional guidance related to grant budgets, refer to the BSCC Grant Administration Guide. The Budget Attachment is provided as a stand-alone document on the BSCC website.

Budget Attachment

[ORT-Grant-Program-Budget-Attachment-Final.xlsx](#)

SECTION V -
ATTACHMENTS

This section list the attachments that are required at the time of submission, unless otherwise noted. Project Work Plan (Appendix B) - Mandatory Grantee Assurance for Non-Governmental Organizations (Appendix D) - Mandatory Local Impact Letter(s) (Appendix E) - Mandatory Letter(s) of Commitment (Appendix F) - If Applicable Policies Limiting Racial Bias - Refer to page 9 of the Proposal Instruction Packet - Mandatory Policies on Surveillance Technology - Refer to page 9 of the Proposal Instruction Packet - If Applicable Certification of Compliance with BSCC Policies on Debarment, Fraud, Theft, and Embezzlement (Appendix G) - Mandatory Governing Board Resolution (Appendix H) - Optional

Project Work Plan (Appendix B)

[Project-Work-Plan-ORT.docx](#)

Grantee Assurance for Non-Governmental Organizations (Appendix D)

[Appendix_D.pdf](#)

Local Impact Letter(s) (Appendix E)

[Local_Impact_Letter.pdf](#)

Letter(s) of
Commitment,
(Appendix F)

n/a

Policies Limiting Racial Bias

[Bias-Based_Policing_Policy.pdf](#)

Policies on Surveillance Technology

[ALPR_Sample_Policy.pdf](#)

Certification of Compliance with BSCC Policies on Debarment, Fraud, Theft, and Embezzlement
(Appendix G)

[Appendix_G.pdf](#)

OPTIONAL: n/a
Governing Board
Resolution (Appendix
H)

OPTIONAL: n/a
Bibliography

CONFIDENTIALITY NOTICE: **All documents submitted as a part of the Organized Retail Theft Prevention Grant Program proposal are public documents and may be subject to a request pursuant to the California Public Records Act. The BSCC cannot ensure the confidentiality of any information submitted in or with this proposal. (Gov. Code, § 6250 et seq.)**

Appendix B: Project Work Plan

Applicants must complete a Project Work Plan. This Project Work Plan identifies measurable goals and objectives, process and outcome measures, activities and services, responsible parties for those activities and services, data sources and estimated timelines. Completed plans should (1) identify the project’s top goals and objectives; (2) identify how the goal(s) will be achieved in terms of the activities, responsible staff/partners, and start and end dates, process and outcome measures; and (3) provide goals and objectives with a clear relationship to the need and intent of the grant. As this grant term is for three (3) years, the Project Work Plan must attempt to identify activities/services and estimate timelines for the entire grant term. A minimum of one goal and corresponding objectives, process measures, etc. must be identified.

Applicants must use the Project Work Plan provided below. You will be prompted to upload this document to the BSCC-Submittable Application.

| | | | |
|---|--|-------------------|---------------------|
| (1) Goal: | > Reduction in Organized Retail Theft Incidents | | |
| Objectives (A., B., etc.) | > Decrease the number of reported organized retail theft incidents (retail thefts, vehicle thefts, vehicle part thefts, cargo thefts). | | |
| Process Measures and Outcome Measures: | > Number of reported organized retail theft incidents before and after the implementation of the Flock Automated License Plate Reader cameras. > Comparison of the average monthly or annual incidents pre- and post- implementation. > Demonstrable decrease in the number of reported organized retail theft incidents. > Percentage reduction in organized retail theft incidents. | | |
| Project activities that support the identified goal and objectives: | Responsible staff/partners | Timeline | |
| | | Start Date | End Date |
| > Pre-deployment data collection > Procurement and deployment of Flock Safety ALPR cameras at specific locations throughout the city. > Continual data collection throughout grant program. | > Administrative Lieutenant > Patrol and Investigative Staff | > October 1, 2023 | > December 31, 2026 |
| List data and sources to be used to measure outcomes: | > Banning Police Department CAD data, Police Reports, Flock collection reports | | |

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| (2) Goal: | > Minimization of Financial Losses for Retailers | | |
| Objectives (A., B., etc.) | > Reduce the financial impact of organized retail theft on retailers. | | |
| Process Measures and Outcome Measures: | > Financial data analysis, comparing the total financial losses incurred by retailers pre- and post-implementation of the strategy. > Comparison of the average monetary losses per incident before and after the implementation. > Measurable decrease in financial losses for retailers. > Percentage reduction in financial losses attributed to organized retail theft. | | |
| Project activities that support the identified goal and objectives: | Responsible staff/partners | Timeline | |
| | | Start Date | End Date |
| > Deployment of Flock ALPR cameras > Routine data collection from Banning PD and retailers | > Administrative Lieutenant | > January 1, 2024 | > December 31, 2026 |
| List data and sources to be used to measure outcomes: > Banning Police Department CAD data, Police Reports, Retailer Loss Prevention Reports | | | |

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| (3) Goal: | > Enhanced Collaboration Between Retailers and Law Enforcement | | |
| Objectives (A., B., etc.) | > Strengthen collaboration and information sharing between retailers and law enforcement agencies. | | |
| Process Measures and Outcome Measures: | > Number of collaborative initiatives established, such as information sharing platforms, or regular meetings. > Participation rate of retailers and law enforcement personnel in training programs and workshops. > Improved communication and collaboration between retailers and law enforcement agencies. > Enhanced exchange of information intelligence related to organized retail theft. > Timely and effective response to organized retail theft incidents due to improved coordination. | | |
| Project activities that support the identified goal and objectives: | Responsible staff/partners | Timeline | |
| | | Start Date | End Date |
| > Public awareness campaigns > Collaboration and training programs | > Administrative Lieutenant > Community Outreach Sergeant | > January 1, 2024 | > December 31, 2026 |
| List data and sources to be used to measure outcomes: > Retailer Feedback, Banning Police Department CAD data | | | |

Organized Retail Theft Prevention Grant Program - Project Budget and Budget Narrative

Name of Applicant: **Banning Police Department**
(i.e., County Sheriff's Office, County Probation Department, or City Police Department)

44-Month Budget: October 1, 2023 to June 1, 2027

Note: Rows 7-16 will auto-populate based on the information entered in the budget line items (Salaries and Benefits, Services and Supplies, etc.)

| Budget Line Item | Total |
|---|---------------------|
| 1. Salaries & Benefits | \$98,120.00 |
| 2. Services and Supplies | \$0.00 |
| 3. Professional Services or Public Agencies | \$8,000.00 |
| 4. Non-Governmental Organization (NGO) Subcontracts | \$0.00 |
| 5. Data Collection and Evaluation | \$15,000.00 |
| 6. Equipment/Fixed Assets | \$180,000.00 |
| 7. Financial Audit (Up to \$25,000) | \$15,000.00 |
| 8. Other (Travel, Training, etc.) | \$0.00 |
| 9. Indirect Costs | \$6,000.00 |
| TOTAL | \$322,120.00 |

1a. Salaries & Benefits

| Description of Salaries & Benefits | (% FTE or Hourly Rate) & Benefits | Total |
|------------------------------------|---|--------------------|
| Lieutenant overtime rate | \$142/hr OT Burden Rate x 440 hours (10hrs/month x 44 months) | \$62,480.00 |
| Lieutenant overtime benefits rate | \$15/OT Benefits x 440 hours | \$6,600.00 |
| Sergeant overtime rate | \$119/hr OT Burden Rate x 220 hours (5hrs/month x 44 months) | \$26,180.00 |
| Sergeant overtime benefits rate | \$13/hr Benefits x 220 hours | \$2,860.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTAL | | \$98,120.00 |

1b. Salaries & Benefits Narrative:

Over the course of the grant cycle the Administrative Lieutenant will dedicate a 10 hour overtime day per month to manage grant related activities, compile data related to the grant, and prepare associated reports detailing the status of activities related to the goals and objectives of the grant. Five (5) hours of overtime per month will be set aside for Sergeants performing administrative duties at the direction of the Lieutenant to ensure grant activities continue to progress towards the goals and objectives detailed in this proposal.

2a. Services and Supplies

| Description of Services or Supplies | Calculation for Expenditure | Total |
|-------------------------------------|-----------------------------|---------------|
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTAL | | \$0.00 |

2b. Services and Supplies Narrative:

N/A.

| 3a. Professional Services | | |
|---|--|-------------------|
| Description of Professional Service(s) | Calculation for Expenditure | Total |
| Flock Safety Standard Implementation Fee | 10 Free Standing Flock Mounting Systems (\$650 each) | \$6,500.00 |
| Flock Safety Existing Infrastructure Implementation Fee | 10 Existing Infrastructure Flock Mounting Systems (\$150 each) | \$1,500.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTAL | | \$8,000.00 |

3b. Professional Services Narrative

The deployment of Flock Safety Automated License Plate Reader cameras (Flock Safety Falcon) will require the cameras to be mounted at various locations throughout the city. The "Free Standing" mounting system is a stand alone pole dedicated to the ALPR camera and will be used in areas where existing mounting structures are not present. The "Existing Infrastructure" mounting system will incorporate a Flock Falcon camera mounted on an already existing City of Banning pole or structure.

| 4a. Non-Governmental Organization (NGO) Subcontracts | | |
|---|-------------------------|---------------|
| Description of Non-Governmental Organization (NGO) Subcontracts | Calculation for Expense | Total |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTALS | | \$0.00 |

4b. Non-Governmental Organization (NGO) Subcontracts Narrative

N/A.

| 5a. Data Collection and Evaluation | | |
|---|------------------------------|--------------------|
| Description of Data Collection and Evaluation | Calculation for Expense | Total |
| Surveys, Data Management, Local Evaluation Plan and Final Local Evaluation Report | \$15,000 / \$307,120 = 4.88% | \$15,000.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTALS | | \$15,000.00 |

5b. Data Collection and Evaluation Narrative

Estimated \$5,000.00 per year for 3 years. Hours spent on creating and evaluating surveys, collecting and analyzing data, creation of the Local Evaluation Plan for the program and creation of Final Local Evaluation Report at program completion.

| 6a. Equipment/Fixed Assets | | |
|---------------------------------------|--|-------------|
| Description of Equipment/Fixed Assets | Calculation for Expense | Total |
| Flock Safety Platform (year 1) | 20 Flock Safety Falcon cameras & 1 Flock Safety FlockOS (year 1) | \$60,000.00 |

| | | |
|--------------------------------|--|---------------------|
| Flock Safety Platform (year 2) | 20 Flock Safety Falcon cameras & 1 Flock Safety FlockOS (year 2) | \$60,000.00 |
| Flock Safety Platform (year 3) | 20 Flock Safety Falcon cameras & 1 Flock Safety FlockOS (year 3) | \$60,000.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTALS | | \$180,000.00 |

6b. Equipment/Fixed Assets Narrative

The subscription to 20 Flock Safety Falcon ALPR cameras and licensing agreements for a 36 month term.

7a. Financial Audit

| Description | Calculation for Expense | Total |
|------------------------|--|--------------------|
| Eide Bailly Accounting | \$15,000.00 for external audit conducted by Eide Bailly Accounting | \$15,000.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTAL | | \$15,000.00 |

7b. Financial Audit) Narrative:

The City of Banning currently uses Eide Bailly as the City's external accounting firm for audits. Based on current rates and expected annual increases by FY27 it is projected that the cost of auditing the grant program described will be \$15,000.00.

8a. Other (Travel, Training, etc.)

| Description | Calculation for Expense | Total |
|--------------|-------------------------|---------------|
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| | | \$0.00 |
| TOTAL | | \$0.00 |

8b. Other (Travel, Training, etc.) Narrative:

N/A.

9a. Indirect Costs

| For this grant program, indirect costs may be charged using only one of the two options below: | Grant Funds | Total |
|---|-------------|---------|
| 1) Indirect costs not to exceed 10 percent (10%) of the total grant award. Applicable if the organization does not have a federally approved indirect cost rate. | \$6,000 | \$6,000 |
| <i>If using Option 1) grant funds allocated to Indirect Costs may not exceed:</i> | \$0 | |
| 2) Indirect costs not to exceed 20 percent (20%) of the total grant award. Applicable if the organization has a federally approved indirect cost rate. Amount claimed may not exceed the organization's federally approved indirect cost rate. | \$0 | \$0 |
| <i>If using Option 2) grant funds allocated to Indirect Costs may not exceed:</i> | \$0 | |

| | | | |
|--|-------|---------|---------|
| Please see instructions tab for additional information regarding Indirect Costs. If the amount exceeds the maximum allowed and/or turns red , please adjust it to not exceed the line-item noted. | TOTAL | \$6,000 | \$6,000 |
|--|-------|---------|---------|

9b. Indirect Costs Narrative:

The City of Banning and the Banning Police Department expects \$6,000.00 in indirect costs associated with the management of this grant. Those funds will be used to compensate two Accountant II positions and the City of Banning's Grant Manager who will all be associated with the management and documentation of funds spent during the execution of this proposed grant program. There work related to the grant will be documented accordingly. Accountant II hourly burden rate - \$63 and City of Banning Grant Manager hourly burden rate - \$78 (both rates are salary with benefits).

BANNING POLICE DEPARTMENT



OFFICE OF THE CHIEF OF POLICE

To: Board of State and Community Corrections

Re: The Organized Retail Theft Prevention Grant Program

Date: June 29, 2023

The Banning Police Department is seeking funding from the State of California Board of State and Community Corrections (BSCC) in the form of the Organized Retail Theft Prevention Grant Program. As part of the request for proposal packet this document serves as the Local Impact Letter requirement. The Banning Police Department concludes that the Organized Retail Theft Prevention Grant Program project will not impact any other agencies.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeff R Horn".

Jeff Horn, Captain (Acting Chief of Police)

Bias-Based Policing

401.1 PURPOSE AND SCOPE

This policy provides guidance to [department/office] members that affirms the Banning Police Department's commitment to policing that is fair and objective.

Nothing in this policy prohibits the use of specified characteristics in law enforcement activities designed to strengthen the [department/office]'s relationship with its diverse communities (e.g., cultural and ethnicity awareness training, youth programs, community group outreach, partnerships).

401.1.1 DEFINITIONS

Definitions related to this policy include:

Bias-based policing - An inappropriate reliance on actual or perceived characteristics such as race, ethnicity, national origin, religion, sex, sexual orientation, gender identity or expression, economic status, age, cultural group, disability, or affiliation with any non-criminal group (protected characteristics) as the basis for providing differing law enforcement service or enforcement (Penal Code § 13519.4).

401.2 POLICY

The Banning Police Department is committed to providing law enforcement services to the community with due regard for the racial, cultural or other differences of those served. It is the policy of this [department/office] to provide law enforcement services and to enforce the law equally, fairly, objectively and without discrimination toward any individual or group.

401.3 BIAS-BASED POLICING PROHIBITED

Bias-based policing is strictly prohibited.

However, nothing in this policy is intended to prohibit an officer from considering protected characteristics in combination with credible, timely and distinct information connecting a person or people of a specific characteristic to a specific unlawful incident, or to specific unlawful incidents, specific criminal patterns or specific schemes.

401.3.1 CALIFORNIA RELIGIOUS FREEDOM ACT

Members shall not collect information from a person based on religious belief, practice, affiliation, national origin or ethnicity unless permitted under state or federal law (Government Code § 8310.3).

Members shall not assist federal government authorities (Government Code § 8310.3):

- (a) In compiling personal information about a person's religious belief, practice, affiliation, national origin or ethnicity.

Banning Police Department

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Bias-Based Policing

- (b) By investigating, enforcing or assisting with the investigation or enforcement of any requirement that a person register with the federal government based on religious belief, practice, or affiliation, or national origin or ethnicity.

401.4 MEMBER RESPONSIBILITIES

Every member of this [department/office] shall perform his/her duties in a fair and objective manner and is responsible for promptly reporting any suspected or known instances of bias-based policing to a supervisor. Members should, when reasonable to do so, intervene to prevent any biased-based actions by another member.

401.4.1 REASON FOR CONTACT

Officers contacting a person shall be prepared to articulate sufficient reason for the contact, independent of the protected characteristics of the individual.

To the extent that written documentation would otherwise be completed (e.g., arrest report, field interview (FI) card), the involved officer should include those facts giving rise to the contact, as applicable.

Except for required data-collection forms or methods, nothing in this policy shall require any officer to document a contact that would not otherwise require reporting.

401.4.2 REPORTING TRAFFIC STOPS

Each time an officer makes a traffic stop, the officer shall report any information required in the Traffic Function and Responsibility Policy.

401.4.3 REPORTING OF STOPS

Unless an exception applies under 11 CCR 999.227, an officer conducting a stop of a person shall collect the data elements required by 11 CCR 999.226 for every person stopped and prepare a stop data report. When multiple officers conduct a stop, the officer with the highest level of engagement with the person shall collect the data elements and prepare the report (11 CCR 999.227).

If multiple agencies are involved in a stop and the Banning Police Department is the primary agency, the Banning Police Department officer shall collect the data elements and prepare the stop data report (11 CCR 999.227).

The stop data report should be completed by the end of the officer's shift or as soon as practicable (11 CCR 999.227).

401.5 SUPERVISOR RESPONSIBILITIES

Supervisors should monitor those individuals under their command for compliance with this policy and shall handle any alleged or observed violations in accordance with the Personnel Complaints Policy.

- (a) Supervisors should discuss any issues with the involved officer and his/her supervisor in a timely manner.

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Bias-Based Policing

1. Supervisors should document these discussions, in the prescribed manner.
- (b) Supervisors should periodically review MAV recordings, portable audio/video recordings, Mobile Data Terminal (MDT) data and any other available resource used to document contact between officers and the public to ensure compliance with the policy.
 1. Supervisors should document these periodic reviews.
 2. Recordings or data that capture a potential instance of bias-based policing should be appropriately retained for administrative investigation purposes.
- (c) Supervisors shall initiate investigations of any actual or alleged violations of this policy.
- (d) Supervisors should take prompt and reasonable steps to address any retaliatory action taken against any member of this [department/office] who discloses information concerning bias-based policing.

401.6 TRAINING

Training on fair and objective policing and review of this policy should be conducted as directed by the Training Section.

- (a) All sworn members of this [department/office] will be scheduled to attend Peace Officer Standards and Training (POST)-approved training on the subject of bias-based policing.
- (b) Pending participation in such POST-approved training and at all times, all members of this [department/office] are encouraged to familiarize themselves with and consider racial and cultural differences among members of this community.
- (c) Each sworn member of this [department/office] who received initial bias-based policing training will thereafter be required to complete an approved refresher course every five years, or sooner if deemed necessary, in order to keep current with changing racial, identity and cultural trends (Penal Code § 13519.4(i)).

401.7 REPORTING TO CALIFORNIA DEPARTMENT OF JUSTICE

The Professional Standards Unit Manager shall ensure that all data required by the California Department of Justice (DOJ) regarding complaints of racial bias against officers is collected and provided to the Records Supervisor for required reporting to the DOJ (Penal Code § 13012; Penal Code § 13020). See the Records Bureau Policy.

Supervisors should ensure that data stop reports are provided to the Records Supervisor for required annual reporting to the DOJ (Government Code § 12525.5) (See Records Bureau Policy).

Automated License Plate Readers (ALPRs)

429.1 PURPOSE AND SCOPE

The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Reader (ALPR) technology.

429.2 POLICY

The policy of the [agencyName] is to utilize ALPR technology to capture and store digital license plate data and images while recognizing the established privacy rights of the public.

All data and images gathered by the ALPR are for the official use of this [departmentoffice]. Because such data may contain confidential information, it is not open to public review.

429.3 ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by the [agencyName] to convert data associated with vehicle license plates for official law enforcement purposes, including identifying stolen or wanted vehicles, stolen license plates and missing persons. It may also be used to gather information related to active warrants, homeland security, electronic surveillance, suspect interdiction and stolen property recovery.

All installation and maintenance of ALPR equipment, as well as ALPR data retention and access, shall be managed by the [DivisionAdmin][DivisionCommander]. The [DivisionAdmin][DivisionCommander] will assign members under his/her command to administer the day-to-day operation of the ALPR equipment and data.

429.3.1 ALPR ADMINISTRATOR

The [DivisionAdmin][DivisionCommander] shall be responsible for developing guidelines and procedures to comply with the requirements of Civil Code § 1798.90.5 et seq. This includes, but is not limited to (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

- (a) A description of the job title or other designation of the members and independent contractors who are authorized to use or access the ALPR system or to collect ALPR information.
- (b) Training requirements for authorized users.
- (c) A description of how the ALPR system will be monitored to ensure the security of the information and compliance with applicable privacy laws.
- (d) Procedures for system operators to maintain records of access in compliance with Civil Code § 1798.90.52.
- (e) The title and name of the current designee in overseeing the ALPR operation.
- (f) Working with the Custodian of Records on the retention and destruction of ALPR data.

Automated License Plate Readers (ALPRs)

- (g) Ensuring this policy and related procedures are conspicuously posted on the [departmentoffice]'s website.

429.4 OPERATIONS

Use of an ALPR is restricted to the purposes outlined below. [DepartmentOffice] members shall not use, or allow others to use the equipment or database records for any unauthorized purpose (Civil Code § 1798.90.51; Civil Code § 1798.90.53).

- (a) An ALPR shall only be used for official law enforcement business.
- (b) An ALPR may be used in conjunction with any routine patrol operation or criminal investigation. Reasonable suspicion or probable cause is not required before using an ALPR.
- (c) While an ALPR may be used to canvass license plates around any crime scene, particular consideration should be given to using ALPR-equipped cars to canvass areas around homicides, shootings and other major incidents. Partial license plates reported during major crimes should be entered into the ALPR system in an attempt to identify suspect vehicles.
- (d) No member of this [departmentoffice] shall operate ALPR equipment or access ALPR data without first completing [departmentoffice]-approved training.
- (e) No ALPR operator may access [departmentoffice], state or federal data unless otherwise authorized to do so.
- (f) If practicable, the [officer_deputy] should verify an ALPR response through the California Law Enforcement Telecommunications System (CLETS) before taking enforcement action that is based solely on an ALPR alert.

429.5 DATA COLLECTION AND RETENTION

The [DivisionAdmin] [DivisionCommander] is responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data. Data will be transferred from vehicles to the designated storage in accordance with [departmentoffice] procedures.

All ALPR data downloaded to the server should be stored for a minimum of one year (Government Code § 34090.6) and in accordance with the established records retention schedule. Thereafter, ALPR data should be purged unless it has become, or it is reasonable to believe it will become, evidence in a criminal or civil action or is subject to a discovery request or other lawful action to produce records. In those circumstances the applicable data should be downloaded from the server onto portable media and booked into evidence.

429.6 ACCOUNTABILITY

All data will be closely safeguarded and protected by both procedural and technological means. The [agencyName] will observe the following safeguards regarding access to and use of stored data (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

Automated License Plate Readers (ALPRs)

- (a) All ALPR data downloaded to the mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date and time (Civil Code § 1798.90.52).
- (b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate law enforcement purposes only, such as when the data relate to a specific criminal investigation or [departmentoffice]-related civil or administrative action.
- (c) ALPR system audits should be conducted on a regular basis.

For security or data breaches, see the Records Release and Maintenance Policy.

429.7 RELEASING ALPR DATA

The ALPR data may be shared only with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law, using the following procedures:

- (a) The agency makes a written request for the ALPR data that includes:
 - 1. The name of the agency.
 - 2. The name of the person requesting.
 - 3. The intended purpose of obtaining the information.
- (b) The request is reviewed by the [DivisionAdmin] [DivisionCommander] or the authorized designee and approved before the request is fulfilled.
- (c) The approved request is retained on file.

Requests for ALPR data by non-law enforcement or non-prosecutorial agencies will be processed as provided in the Records Maintenance and Release Policy (Civil Code § 1798.90.55).

429.8 TRAINING

The [trainingManager] should ensure that members receive [departmentoffice]-approved training for those authorized to use or access the ALPR system (Civil Code § 1798.90.51; Civil Code § 1798.90.53).