



**TESTIMONY OF
THE DEPARTMENT OF THE ATTORNEY GENERAL
TWENTY-NINTH LEGISLATURE, 2018**

ON THE FOLLOWING MEASURE:

H.B. NO. 2071, H.D. 2, RELATING TO LAW ENFORCEMENT.

BEFORE THE:

SENATE COMMITTEES ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND
MILITARY AFFAIRS AND ON LABOR

DATE: Thursday, March 15, 2018 **TIME:** 1:15 p.m.

LOCATION: State Capitol, Room 229

TESTIFIER(S): Russell A. Suzuki, Acting Attorney General, or
Lance Goto, Deputy Attorney General.

Chairs Nishihara and Tokuda and Members of the Committees:

The Department of the Attorney General ("the Department") appreciates the intent of this bill and submits comments.

The purpose of this bill is to establish an unpaid fourteen-member law enforcement standards board, in the Department, that will be responsible for the following:

- (1) Develop minimum standards for state and county law enforcement officers in this State;
- (2) Establish and maintain curriculum and training programs for the officers;
- (3) Establish and require participation in continuing education programs for the officers; and
- (4) Manage a certification program for the officers that includes certification of officers, enforcement of certification requirements, investigations of officers, conducting revocation proceedings, and revoking certifications.

The unpaid law enforcement standards board has great responsibilities. And section 6 of the bill, on page 12, requires all law enforcement officers in the State to be certified by July 1, 2019. That appears to be an ambitious goal. In fact, the proposed scope of the functions and responsibilities of the board appear to require the

establishment of not just the board, but an entire training and regulatory agency. This proposal is significant and appears to warrant further study and evaluation.

The Department has some concerns about section -3 of the new chapter in the bill, which begins at the bottom of page 5. This section establishes the powers and duties of the board. But some of the powers and duties are not clearly established. It does not clearly establish the responsibilities to certify all law enforcement officers and to revoke the certification of officers. On page 6, lines 3-5, the bill provides that the board shall establish minimum standards for employment and certification of law enforcement officers. On page 7, lines 16-18, the bill gives the board the authority to collect fees for certifications. And on page 7, lines 19-20, the bill provides that the board shall establish procedures and criteria for revocation of certifications issued by the board. Section -3 does not clearly set out the board duty and authority to certify officers and revoke certifications.

The board's duty and authority regarding training curriculum and training schools and programs are also unclear. On page 6, lines 10-14, the bill provides that the board shall establish minimum criminal justice curriculum requirements for schools training law enforcement officers. This seems to suggest that the board will provide minimum curriculum requirements to the schools. It is not clear that these requirements are mandatory and will be enforced by the board.

On page 6, lines 15-19, the bill provides that the board will "consult and cooperate" with agencies and educational institutions "concerning the development of law enforcement training schools and programs of criminal justice instruction". It is not clear what this means, especially when considering section -5 of the new chapter, on page 8, lines 8-11:

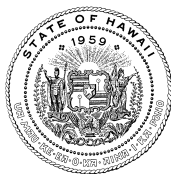
The board shall establish and maintain law enforcement training programs through agencies and institutions deemed appropriate by the board for applications for certification.

It appears that the board is responsible for establishing and maintaining training programs through other agencies and institutions. But it is not clear how that would be accomplished.

On page 7, lines 14-15, the bill provides that the board will establish and require participation in continuing education programs for law enforcement. It appears to require the board to establish and operate these programs, and enforce participation in these programs by law enforcement officers statewide.

The Department appreciates the opportunity to provide comments.

DAVID Y. IGE
GOVERNOR



LAUREL A. JOHNSTON
DIRECTOR

KEN N. KITAMURA
ACTING DEPUTY DIRECTOR

EMPLOYEES' RETIREMENT SYSTEM
HAWAII EMPLOYER-UNION HEALTH BENEFITS TRUST FUND
OFFICE OF THE PUBLIC DEFENDER

**STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE**

P.O. BOX 150
HONOLULU, HAWAII 96810-0150

ADMINISTRATIVE AND RESEARCH OFFICE
BUDGET, PROGRAM PLANNING AND
MANAGEMENT DIVISION
FINANCIAL ADMINISTRATION DIVISION
OFFICE OF FEDERAL AWARDS MANAGEMENT (OFAM)

WRITTEN ONLY

TESTIMONY BY LAUREL A. JOHNSTON
DIRECTOR, DEPARTMENT OF BUDGET AND FINANCE
TO THE SENATE COMMITTEE ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND
MILITARY AFFAIRS
ON
HOUSE BILL NO. 2071, H.D. 2

**March 15, 2018
1:15 p.m.
Room 229**

RELATING TO LAW ENFORCEMENT

House Bill No. 2071, H.D. 2, establishes a Law Enforcement Standards Board (LESB) for certification of law enforcement officers, the LESB Special Fund to defray the expenses of the LESB, appropriates an unspecified amount of general funds for FY 19 to be deposited into the LESB Special Fund, and an unspecified special fund appropriation.

While the Department of Budget and Finance takes no position on the State certification of law enforcement officers, as a matter of general policy, the department does not support the creation of any special fund which does not meet the requirements of Section 37-52.3, HRS. Special funds should: 1) serve a need as demonstrated by the purpose, scope of work and an explanation why the program cannot be implemented successfully under the general fund appropriation process; 2) reflect a clear nexus between the benefits sought and charges made upon the users or beneficiaries or a clear link between the program and the sources of revenue; 3) provide an appropriate means of financing for the program or activity; and 4) demonstrate the capacity to be financially self-sustaining. With regards to House Bill No. 2071, H.D. 2, it is difficult to determine whether the special fund will be financially self-sustaining.

Thank you for your consideration of our comments.

DAVID Y. IGE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

**Testimony of
SUZANNE D. CASE
Chairperson**

**Before the Senate Committee on
PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY AFFAIRS**

**Thursday, March 15, 2018
1:15 PM
State Capitol, Conference Room 229**

**In consideration of
HOUSE BILL 2071, HOUSE DRAFT 2
RELATING TO LAW ENFORCEMENT**

House Bill 207, House Draft 2 proposes to establish a law enforcement standards board for the certification of county police officers, state public safety officers and employees of the Department of Transportation and Department of Land and Natural Resources (Department) with police powers. **The Department supports this bill, provided that its passage does not replace or adversely impact priorities indicated in the Executive Supplemental Budget request.**

The Department believes that collaboration amongst law enforcement agencies and the other proposed members of this board to create standards pertaining to training and certification of law enforcement officers is a positive step. The Department supports consistency of training and other standards to be employed as a law enforcement officer in Hawaii.

Thank you for the opportunity to comment on this measure.

DAVID Y. IGE
GOVERNOR



NOLAN P. ESPINDA
DIRECTOR

Cathy Ross
Deputy Director
Administration

Jodie F. Maesaka-Hirata
Deputy Director
Corrections

Renee R. Sonobe Hong
Deputy Director
Law Enforcement

LATE

STATE OF HAWAII
DEPARTMENT OF PUBLIC SAFETY

919 Ala Moana Boulevard, 4th Floor
Honolulu, Hawaii 96814

No. _____

TESTIMONY ON HOUSE BILL 2071, HOUSE DRAFT 2
RELATING TO LAW ENFORCEMENT

by

Nolan P. Espinda, Director
Department of Public Safety

Senate Committee on Public Safety, Intergovernmental, and Military Affairs
Senator Clarence K. Nishihara, Chair
Senator Glenn Wakai, Vice Chair

Senate Committee on Labor
Senator Jill N. Tokuda, Chair
Senator J. Kalani English, Vice Chair

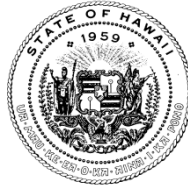
Thursday, March 15, 2018; 1:15 p.m.
State Capitol, Conference Room 229

Chairs Nishihara and Tokuda, Vice Chairs Wakai and English, and Members of the
Committee:

The Department of Public Safety (PSD) **supports the intent** of House Bill (HB) 2071, House Draft (HD) 2, which would establish a law enforcement standards board for the certification of law enforcement officers and training, and further, create a law enforcement standards board special fund. PSD, however, offers comments of concern.

Sections 7 and 8 address revocation or suspension of certifications and investigations. The Department notes that any provisions of this proposed bill should not violate or be inconsistent with the law enforcement officers' collective bargaining agreement, which is BU 14 for deputy sheriffs and BU 13 for Narcotics Enforcement Investigators and Internal Affairs Investigators, under PSD.

Thank you for the opportunity to present this testimony.



Testimony by:
JADE T. BUTAY
DIRECTOR

Deputy Directors
ROY CATALANI
ROSS M. HIGASHI
EDWIN H. SNIFFEN
DARRELL T. YOUNG

IN REPLY REFER TO:

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

March 15, 2018
1:15 p.m.
State Capitol, Room 229

H.B. 2071, H.D. 2
RELATING TO LAW ENFORCEMENT

House Committee(s) on Public Safety, Intergovernmental and Military Affairs & Labor

The Department of Transportation (DOT) **supports** H.B. 2071, H.D. 2, Relating to Law Enforcement.

The purpose of this bill is to establish a law enforcement standards board for the certification of county police officers, safety public officers, and employees of the department of transportation and land and natural resources with police powers.

The DOT recognizes that currently the law enforcement profession is faced with many complex situations, integrity challenges, and a multitude of new criminal elements (i.e., insider threat, active shooters, terrorism, etc.,) and techniques (diversion of law enforcement response teams to determine response time and methods). To address these new developments many law enforcement agencies rely on outdated standards and certification processes, policies and procedures, rules and regulations and recruitment and training standards. Many law enforcement agencies do not have consistent standards and certifiable processes, which is essential to minimize vicarious liability to the State of Hawaii.

To this end, the DOT acknowledges that “best practices” for law enforcement occupation requires the development and establishment of comprehensive entry level minimal qualification standards along with congruent certifiable screening of applicant’s knowledge, skills and abilities, testing (physical fitness), evaluation (mental stability), background checks for previous work performance history, reference checks to determine if administrative misconducts were substantiated and criminal convictions (Lautenberg Amendment Federal Gun Ban on Misdemeanor Domestic Violence Convictions) of all qualified applicants for state law enforcement positions. Internal controls must also be developed to ensure fair and equitable application of these standards by the various agencies.

The DOT looks forward to being part of the proposed law enforcement working group and recommends that as one of our immediate responsibilities is to conduct research into the Commission on Accreditation for Law Enforcement Agencies (CALEA) program, as they have developed and established processes, bench marks, and standards specifically for national law enforcement agencies, which demonstrates that the law enforcement services provided to the public is enhanced and improved to meet societal expectations.

Thank you for the opportunity to provide testimony.

HB-2071-HD-2

Submitted on: 3/12/2018 1:44:18 PM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Stephen Orikasa	Testifying for Maui Police Department	Oppose	No

Comments:

TESTIMONY OF THE HAWAI`I POLICE DEPARTMENT

HOUSE BILL 2071 HD2

RELATING TO LAW ENFORCEMENT

**BEFORE THE COMMITTEE ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY
AFFAIRS**

And

BEFORE THE COMMITTEE ON LABOR

DATE : Thursday, March 15, 2018

TIME : 1:15 P.M.

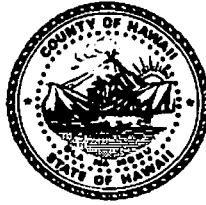
**PLACE : Conference Room 229
State Capitol
415 South Beretania Street**

PERSON TESTIFYING:

**Police Chief Paul K. Ferreira
Hawai`i Police Department
County of Hawai`i**

(Written Testimony Only)

Harry Kim
Mayor



Paul K. Ferreira
Police Chief

Kenneth Bugado Jr.
Deputy Police Chief

County of Hawai`i

POLICE DEPARTMENT

349 Kapi`olani Street • Hilo, Hawai`i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

March 12, 2018

Senator Clarence K. Nishihara
Chairperson and Committee Members
Committee On Public Safety, Intergovernmental, And Military Affairs
Senator Jill N. Tokuda
Chairperson and Committee Members
Committee on Labor
415 South Beretania Street, Room 229
Honolulu, Hawai`i 96813

Re: House Bill 2071 HD2 RELATING TO LAW ENFORCEMENT

Dear Senators Nishihara and Tokuda:

The Hawai`i Police Department opposes House Bill 2071, with its purpose being to establish a law enforcement standards board for the certification of county police officers, state public safety officers, and employees of the departments of transportation and land and natural resources with police powers.

Our concern is geared toward the view that this extra layer of Bureaucratic oversight is contrary to the notion of Home Rule. Additionally, the premise of comparing past enacted legislation involving the need for training and standards for Security Guards to the need for same regarding County Law Enforcement Agencies is quite a stretch. The mandatory training of security guards as set forth by §463-10.5 of the Hawaii Revised Statutes as amended requires an initial 8 hour course and 4 hours annually thereafter.

The cited examples of bad behaviour on the part of individuals are just that, individual actions very similar to the individual wrongdoing in Police Departments throughout the nation. All Police Departments have policies, procedures, rules and regulations and here in Hawai`i even more so based on accreditation standards. The Hawai`i Police Department and the other three County Police Departments are nationally recognized fully accredited Law Enforcement Agencies (LEA) through the Commission on Accreditation for Law Enforcement Agencies (CALEA®). In order for any agency to gain this accreditation they must conform to prescribed standards with appropriate policies and procedural adherence and provide for proof of adherence during on-site assessments conducted by CALEA.

These standards cover all aspects of training, which include entry level recruit training, reserve officer training and specialized training in the area of weapons and tactics used by Special Response Teams and Crisis Negotiators. Use of Force training which include annual reviews of the use of force by the agency to identify needs and recommendations for training equipment and to identify future needs for remedial and specialized training. It also includes annual audits and reviews of evidence and property storage, inspections of funding and control funds, annual reviews of agency needs based on quarterly, annual and triennial reports on issues concerning liability, workload assessments and managing of all resources.

We also have mandates concerning all aspects of criminal report writing, evidence collection and preservation, latent fingerprinting and forensic identity of crime scene evidence; collection, preservation and identification. There is also required annual training on use of force, hazard plans, critical incidents, ethics, bias based profiling, and law updates. Annual reviews of policies and procedures that reinforce and improve crime prevention, community involvement and strengthen agency mission and vision statements in an effort to decrease risk and liability.

To ensure conformance our accredited department undergoes an independent onsite assessment by the CALEA every four years and a web based assessment during the other three years in which proof of compliance to applicable standards must be shown. Each year the Police Chief submits a yearly assessment report that is used in evaluating the agency commitment to accreditation and to identify future assessment review issues. Having an independent assessment places a high value on the accreditation for the agency as it opens the doors for independent scrutiny. No other commission places such a microscopic evaluation on a law enforcement agency. Being an accredited agency is the difference between professionalism and claiming to be professional.

In 2015, the Hawai`i Police Department's classroom training for newly hired sworn personnel consisted of 999 hours. For comparative purposes, the Los Angeles Police Department's (LAPD) Police Officer Standards Training (POST) consists of 920 hours; the Los Angeles County Sheriff's Department (LASD) POST classroom training consists of 856 hours; the state of Washington's POST training is set forth by the Washington State Criminal Justice Training Commission (Washington State CJTC) and consists of 720 classroom hours.

The Hawai`i Police Department's training also calls for approximately 672 hours of "On The Job" training (OJT) in which newly hired sworn officers are paired up with experienced officers and are evaluated during this period and must pass the OJT portion of the training prior to being allowed to work in the field alone as fully commissioned Police Officers.

The act of revoking an officer's certification in Hawai`i is actually stronger than in some other states as once an officer is fired from a County LEA, that officer no longer has police authority in the entire state. Furthermore, the Hawai`i Police Department does not accept direct transfers from other States' Law Enforcement Agencies. Officers who are currently serving in another State and who desire employment with our department are required to undergo our entire Recruit Training process. **It should be noted, we do lose officers to other States and many of these officers do not have to re-start the training process from scratch as our Training and attendant records are widely accepted by other jurisdictions.**

Re: House Bill 2071 HD2 RELATING TO LAW ENFORCEMENT

March 12, 2018

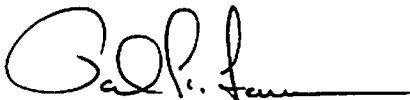
Page 3

This bill seemingly fails to take into account that all Law Enforcement Agencies in the state are under constant monitoring for conforming to modern methods of policing whether it be through review in criminal courts and/or through civil court filings. Further, the fact that all four County Police Departments have already sought and gained voluntary national accreditation seemingly ensures we are following applicable standards based on sound policies.

It is for these reasons, we urge this committee to not approve this legislation.

Thank you for allowing the Hawai`i Police Department to provide comments relating to House Bill 2071 HD2.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul K. Ferreira", with a long horizontal line extending to the right.

PAUL K. FERREIRA
POLICE CHIEF



Aloha Chairs Nishihara and Tokuda, members of the Senate Committees on Public Safety, Intergovernmental, and Military Affairs, and Labor,

On behalf of the nearly 600 registered members of the Young Progressives Demanding Action (YPDA) Hawaii, I would like to express support for the intent of HB2071 HD2. We support the concept of collaboration amongst law enforcement agencies and other proposed members of this board to create standards pertaining to training and certification of law enforcement officers. Consistency of training and other standards makes perfect sense for law enforcement in Hawaii.

That being said, we do not see how this bill will fit in with the overall law enforcement shift that the administration appears to be pushing for. There are currently two vehicles to consolidate law enforcement agencies within the Office of the Attorney General. We believe these two bills represent a serious mistake logistically, financially and in the interest of good law enforcement. A consolidation of the Department of Land and Natural Resources, Division of Conservation and Resources Enforcement (DOCARE); the Department of Public Safety state law enforcement officers and the narcotics enforcement division; and the Department of Transportation harbors division to a newly created enforcement division of the Office of the Attorney General would be difficult to properly execute, could have unintended consequences, and seems unlikely to save money.

This bill, by contrast, would create a standardized level of training and professionalism between these agencies and represents a much better approach to saving money and making logistics more simple and direct. But the two cannot exist at the same time.

Major savings in the coming years will not come by consolidating agencies. What is more urgent is to examine how consolidation of law enforcement **support services** can improve the state's allocation of finite resources to achieve the broadest goals. It is in the areas of **capital and technology** that all law enforcement agencies share a common need, and the state stands to gain the most benefit through improved operations and optimized cost.

Every day, data is pulled from law enforcement areas such as court systems, jail records, prison records, driving records, sex offender records, among others; future data sources could include wildlife records and handgun ownership records. A pilot system could provide multiple law enforcement agencies both image and text information so that, as law enforcement officers conduct investigations and/or are actively involved in an immediate law enforcement activity, they will have complete information about individuals from all data sources that might have a bearing on the case.

Such a project could involve a wide range of agencies in the design. This is just one example of a possible initiative where the potential is great for addressing a common problem through consolidated action, while the results can be much more cost-effective than if each agency tried to address it individually.

Many law enforcement agencies, in addition to their recertification training, offer specialized courses that may have applicability across agency lines. Financial crimes, drug diversion, environmental crimes, and gang awareness, are just a few of the kinds of specialized training that could be helpful to other agencies. But, at the present time, there is no systematic way to share information about courses in which others might wish to participate. Designating one agency to be the keeper of such a shared service could be beneficial.

If the state does not have term contracts for law enforcement equipment, such as weapons, personal protective gear and holsters, yet the data shows that the majority of agencies are using a small number of brands, with varying costs, then—without dictating types of weapons and related gear—the state could perform a valuable function by surveying both state and local law enforcement agencies to gather their annual buying requirements and time frames, and issuing solicitations on their behalf. This kind of leveraging could save money at both the state and local level, and would support agencies' current choices in a positive manner.

As previously noted, the efforts to bring together the state law enforcement partners, technologies and experts to assess the needs, develop a comprehensive strategy, and work jointly to carry it out appears to be a good model that holds promise. We therefore recommend that the committees pass this bill, but also do everything in their power to prevent direct consolidation of these law enforcement agencies within the Office of the Attorney General.

Mahalo,

Will Caron
Social Justice Action Committee Chair

HB-2071-HD-2

Submitted on: 3/12/2018 4:13:01 PM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Erik Vuong	Individual	Support	No

Comments:

I fully support this bill to establish a standardized law enforcement training certification requirement. Law enforcement officers in this state should have a minimum standards of training and in order to be hired as an actual law enforcement officer (with full arrest powers) they need to provide a certificate that shows that they have attended a recognized law enforcement academy. Unfortunately there are "individuals" today who are currently employed as a "law enforcement officers" in this State who have never attended a legitimate law enforcement academy. These individuals had no prior law enforcement experience (ex: flight attendant, forestry technician, military base security, life guards, etc) however because they were part-time volunteers with that department, they somehow were able to be hired on as a law enforcement officers. These individuals are out there today with the means to detain, arrest, and if necessary take a person's life (4th amendment) however they never received any formal law enforcement training. This is a liability to the department and the State should a deadly force incident ever occurred involving these un-trained individuals.

I completely support HB2071 and request that it be passed and signed into law.

HB-2071-HD-2

Submitted on: 3/12/2018 7:57:36 PM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Alan Urasaki	Individual	Support	No

Comments:

HB-2071-HD-2

Submitted on: 3/13/2018 7:36:45 AM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Nancy Davlantes	Individual	Support	No

Comments:

HB-2071-HD-2

Submitted on: 3/13/2018 10:28:16 AM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
lynne matusow	Individual	Support	No

Comments:

I am a private citizen. We, the public, need htis law desperately.

Please support.

Lynne Matusow

HB-2071-HD-2

Submitted on: 3/12/2018 1:36:34 PM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Victor K. Ramos	Individual	Oppose	No

Comments:

There is no logical reason for this bill. The proposed layer of bureaucracy is unnecessary and a waste of money and resources.

All Hawaii Police Departments currently meet CALEA standards making our police departments nationally accredited. I encourage the Legislature to take the time to review the CALEA accreditation process.

HB-2071-HD-2

Submitted on: 3/14/2018 12:41:53 PM

Testimony for PSM on 3/15/2018 1:15:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Barbara Polk	Individual	Comments	No

Comments:

Chairs Nishihara dn Tokuda, Vice Chairs Wakai and English, and members of the committees:

While I am in general support of the intent of this bill, I am concerned that the representation of the public on the proposed Board is minimal and some "public" appointees may even weigh the balance more than it already is in favor of current or past law enforcement personnel.

While I understand that the experience and expertise of the 8 ex officio members and 2 law enforcement officers is important to establishing appropriate training requirements and carrying out the other responsibilities of the Board, I believe that the general public deserves more input into these matters. **I encourage you to consider amending the bill by making some or all of the ex officio members non-voting and advisory only, to add the public defender or designee as a member of the Board, and to increase the number of public members.** I assume that all members of the Board will pay attention to the experience and expertise of the ex officio members, but I do not believe that their views should automatically dominate decisions on this important Board.

In addition, **I recommend that the Bill be amended to require public hearings on each island in the process of developing the programs and standards of training for law enforcement officers, to allow additional public input.**

Thank you for the opportunity to comment on this bill.