The Center for Law and Justice sincerely appreciates the many hours of volunteer service dedicated to the production of recommendations related to workforce matters in transforming policing in the City of Albany. The Center supports all of the working group’s recommendations, which generally promote best practices in workforce management.

However, to contribute to a plan that promotes transformational change in policing in Albany and addresses the racial inequities decried in Governor Cuomo’s Executive Order 203, recommendations that address racial bias in hiring, promotional opportunities, and retention should be specifically delineated. In our November 23, 2020 letter to the working group, we wrote:

The Center for Law and Justice has been contacted by several black Albany Police Department officers, complaining of racial bias in the areas of job assignments and promotions. We suggested to the CNA racial bias auditors that an analysis of the black officer retention rate as compared to the white officer retention rate be conducted (please see the Center’s letter to CNA on page 8). The reinvented policing plan should include mechanisms designed to address any racial bias that exists in hiring, job assignments, and promotions.

Many black Albany Police Department officers have complained to the Center on a number of occasions regarding instances of racial bias, yet there has been no indication that the APD has rectified or even investigated these allegations. In its December 2020 report, CNA included a number of recommendations addressing bias in workforce matters. Notwithstanding the working group’s generic statement in its introductory paragraphs that their recommendations “unanimously support the relevant recommendations outlined in the Albany NY Police Department Racial Bias Audit,” the Center strongly urges that the following CNA recommendations specifically appear as recommendations of the working group:

**Recommendation 43.2:** APD should implement a system or database to track applications and applicant progress through the hiring process and analyze this data annually to identify racial, ethnic, or gender-based disparities at each stage of the hiring process. If such disparities are identified, APD should investigate the root causes and, if possible, implement programs to ameliorate those disparities.

**Recommendation 44.1:** APD should establish a system to collect and retain data about the promotional process, including applicants, applicants’ demographic information, relevant data considered for promotion decisions (e.g., Civil Service Exam results), and outcomes.

**Recommendation 44.2:** APD should analyze promotion data annually to identify racial, ethnic, or gender-based disparities in the promotion process. If such disparities exist, APD should investigate the root causes and, if possible, implement programs to ameliorate those disparities.

**Recommendation 47.1:** APD should develop a completely transparent and open promotional process. If an interview board is used, a clear explanation of topics covered and evaluation criteria used should be posted in advance. Any selection that
deviates from the current ranking should require a written explanation be supplied to the person(s) skipped over.

Recommendation 47.2: To avoid the appearance of favoritism, APD should consider delegating the oral interview component to a neutral law enforcement agency of similar demographics. Detail this change in General Order 2.3.10 Promotional Process in section I.F.3.a.

Recommendation 47.5: If not already a standard practice, APD should engage in exit interviews with departing personnel. APD should analyze information gathered during exit interviews annually to ascertain whether recurring themes are present in personnel departures, and whether these can be addressed.

Once again, the Center expresses its appreciation to all of the volunteers who so generously contributed their time and effort in the production of recommendations. We look forward to seeing the final plan --- complete with goals, strategies, implementation dates, resources, and a proposed tentative budget --- that the Collaborative submits to the Common Council.