

Dr. J. Ted Hunt

Rancho Cucamonga, CA

August 15, 2021

Kirk Bunch, POST Law Enforcement Consultant
Attention: Rulemaking
Commission on Peace Officer Standards and Training
860 Stillwater Road, Suite 100
West Sacramento, CA 95605-1630

***RE: OPPOSE THE "REGULATORY ACTION – AMEND COMMISSION REGULATION 1005(A)
MINIMUM STANDARDS FOR TRAINING FOR DISTRICT ATTORNEY INVESTIGATORS***

Dear Mr. Bunch:

This letter is intended to be a part of public comments regarding the proposed Regulatory Action which would Amend POST Commission Regulation 1005(A) to lower the professional training standards for District Attorney Investigators (DAI).

By way of perspective, I served as a POST Commissioner for nine years, having been appointed by both a Democrat and Republican governor. In addition, for years prior to becoming a Commissioner, I was involved with developing curricula and testing criteria for both the Regular Basic Course and In-Service Training. My credentials in advancing police reforms are considerable and have been well documented. I am not against reforms, I am against unsupported, unwise, and detrimental reforms.

It is clear this proposal will reduce professional standards for District Attorney Investigators, therefore, I oppose this "reform."

In POST Bulletin No. 2021-31, dated July 30, 2021, under the heading of "Anticipated Benefits of the Proposed Amendments," it is found on page three, the rationale for the proposed change is to "increase the efficiency of the state of California in delivering services to stakeholders." The implausible attempt to justify the change continues by stating if the change occurs, "the law enforcement standards are maintained and effective in preserving peace, protection of public health, safety, and welfare of California."

It is not reasonable to lower meaningful standards without detriment. How does one explain that lowering standards will "increase efficiency" and not adversely affect "preserving [the] peace" or adversely affecting the protection of the public's health, safety, and welfare?

There is no substantiation or evidence for the claim that efficiency will increase without adverse effect. There is no basis in reason or in fact which is offered as justification of the proposal. The reasoning, based on the statement is vague and inexplicit. The statement is crafted to evoke an affirmative opinion. It is an attempt to create a "feel-good" policy. But in fact, the proposal offers no substantive information as to why the change should occur and what benefits will accrue to the public and the profession.

Making this change is contrary to what one would normally envision. The communities of California expect a high degree of professionalism from their peace officers. There has been extensive research which validates that increasing educational and training standards leads to greater effectiveness, efficiency, and efficacy. Lowering standards does the opposite.

Additionally, there is significant evidence that lowering standards is dangerous and leads to negative outcomes for the people who depend on ethical, professional police services. That is why many agencies in California require a minimum of a bachelor's degree as part of the hiring requirements. And all full-service agencies require successful completion of the Regular Basic Course.

Each profession demands its members meet specific competencies which are gained through education and training. Those criteria assure the public that the professional practitioner can effectively complete the expected obligations, responsibilities, and duties of their profession.

There are expectations that all physicians, attorneys, accountants, and other professionals are competent because they have met the basic standards. Meeting basic standards provides the public with assurance of professional competency. Peace officers are no different.

No one wants to be treated by a physician who has not been properly trained. It could mean life and death for the consumer of the physician's services. The police service is also a profession that deals in life and death decisions. Peace officers must be properly trained, with no short cuts, and no omission of important **BASIC** skills training. That is why POST tests for Learning Domain competency; it is pass or fail. A fledgling peace officer must master the skills to pass. Do not lower standards, raise them.

Finally, under the heading "Consideration of Alternatives," found on page four, it charges that "the Commission must determine that no reasonable alternative considered by the Commission . . . would be more effective in carrying out the purpose for which the action is proposed."

There is an obvious alternative - meet the standards. Assure the public each DAI is qualified and competent to complete their assigned tasks. Please reject this proposal which buffets and assails the high standards we all expect from the professionals of the police service.

Very truly yours,



Dr. J. Ted Hunt
LAPD Ret

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