

Unified State Law Enforcement Commission

Report

Submitted December 15, 2021

The members of the Unified State Law Enforcement Commission voted on December 14, 2021, to approve this Report for submission to the Governor and legislative leaders pursuant to Enrolled Senate Bill 371 (2021).

Chairman Chip Keating	YES
Senator Kim David	YES
Speaker Pro-tempore Terry O'Donnell	YES
Secretary Tricia Everest	YES
Director Ricky Adams	NO
Commissioner Tim Tipton	YES
Director Donnie Anderson	YES
1st Assistant Attorney General Tim Downing	ABSENT

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INTRODUCTION

Background

The Unified State Law Enforcement Commission was established by Enrolled Senate Bill 371¹ by Sen. Kim David and Speaker Pro-Tempore. Terry O'Donnell. The Commission sunsets next year on December 1, 2022.

The tasks assigned to this Commission are:

1. Study, evaluate and make recommendations regarding unification of the Oklahoma State Bureau of Investigation, the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, and the Department of Public Safety;
2. Study, evaluate and make recommendations regarding a recruitment, training and leadership development program for members of a unified state law enforcement agency that will enhance the efforts of the state to recruit, lead and retain highly qualified state law enforcement officers;
3. Study, evaluate and make recommendations regarding how best to ensure accountability within a unified state law enforcement agency and to address public corruption; and
4. Study, evaluate and make recommendations regarding any other matters determined by the Commission to be relevant to the purpose of this act.

The following individuals served as voting members of the Commission and each proved to be a vital resource for this important work:

1. Chip Keating, Chair, appointed by and serving at the pleasure of Governor J. Kevin Stitt;
2. Sen. Kim David,² appointed by and serving at the pleasure of the President Pro-Tempore of the Senate;

¹ http://webservice1.lsb.state.ok.us/cf_pdf/2021-22%20ENR/SB/SB371%20ENR.PDF The Commission is codified in the Oklahoma Statutes as Section 9100 of Title 74.

² <https://oksenate.gov/senators/kim-david>

3. Rep. Terry O'Donnell³, Speaker Pro-Tempore, appointed by and serving at the pleasure of the Speaker of the House;
4. Tricia Everest, Secretary of Public Safety
5. Tim Downing, First Assistant Attorney General, appointed by and serving at the pleasure of the Oklahoma Attorney General;
6. Ricky Adams⁴, Director, Oklahoma State Bureau of Investigation;
7. Tim Tipton⁵, Commissioner, Department of Public Safety; and
8. Donnie Anderson⁶, Director, Oklahoma Bureau of Narcotics and Dangerous Drugs Control.

The members of the Commission wish to recognize and express our gratitude to the many individuals who assisted with our work. Primary staffing duties were assigned to the staff of the State Senate, led by Becky Gooch, Senate Committee and Policy Director. Jason Nelson, Deputy Secretary for Public Safety and Kathy Mires, assistant to Mr. Keating, also provided support to the Commission. Scores of individuals from the Oklahoma State Bureau of Investigation, the Oklahoma Department of Public Safety, the Oklahoma Bureau of Narcotics and Dangerous Drugs Control, the United States Justice Department, the Federal Bureau of Investigation, United States Attorneys, the Oklahoma Sheriffs Association, the Oklahoma Chiefs of Police Association, and many others advised the Commission, their contributions being of immense value.

State of Law Enforcement

It is our studied position and strong belief that law enforcement in Oklahoma is in crisis. A confluence of factors are contributing to this crisis.

In the wake of nationally publicized incidents of abuse of police power, a negative narrative toward law enforcement generally has taken root resulting in a negative national mood making recruiting and retaining law enforcement personnel more difficult.

The evolving interests and career expectations of the younger generations has, for many years now, significantly reduced the pool of young people interested in a career in law enforcement. The current structure of state law enforcement entities in this current recruiting environment exacerbates these challenges. The siloed structure of

³ <https://www.okhouse.gov/Members/District.aspx?District=23>

⁴ <https://osbi.ok.gov/about/administration>

⁵ <https://oklahoma.gov/dps/about-dps/leadership/commissioner-tim-tipton.html>

⁶ <https://www.obnndd.ok.gov/about-us/administration>

state law enforcement lacks the necessary career appeal because it does not foster the kind of career options desired.

Changing social norms are also a contributing factor. Behaviors once considered socially unacceptable have become acceptable but remain, justifiably, disqualifying for a career in law enforcement.

Relatively low pay for state law enforcement personnel, the lack of career options, periods of low morale, the significant number of troopers eligible to retire, and Oklahoma's generally good economy have all made retention of law enforcement personnel a growing challenge.

These many factors are also a significant problem in recruiting and retaining a highly qualified and motivated *civilian* workforce in state law enforcement agencies.

These challenges can generally be grouped into four critical categories: Mental wellness; Recruitment; Retention; and Training. Further, it is our studied position and strong belief that addressing only one or two or three of these areas of concern will prove to be wholly insufficient to reverse the current troubling trends. We commend Governor Stitt and the Legislature for creating this Commission and for the thoughtful tasks it was assigned. Its timing is fortuitous and we believe the recommendations in this report are worthy of your confidence and we urge adoption.

A significant commitment by the Legislature and Governor over a sustained period of time is necessary to mitigate this current crisis and reverse the troubling trend.

Focus Groups

From the outset, the Commission decided that it would make no recommendations that would call for:

- Diminishing the rigor of current training regimens;
- Putting law enforcement personnel in positions for which they lack the necessary training and competence;
- Putting law enforcement and non-commissioned or civilian personnel in supervisory positions in which they lack the necessary supervisor training, and the necessary experience and training in the activities they are to supervise;
- Eliminating the distinctions between patrol, narcotics, and investigations; or
- Changes to any current personnel's pension.

After the first meeting of the Commission, three meetings were held with frontline law enforcement personnel. One meeting with troopers, one with an OBN agent and one with OSBI agents. These three meetings were followed by six focus

groups or “committee meetings,” each lasting at least two hours, conducted between July 20 and July 30, each session focused on one of six topics: Recruitment, Training, Advancement, Lateral Transfers, Supervisors, and Facilities. In all, 32 frontline troopers, agents and investigators participated in the frontline focus groups — at least two representatives from each agency— OBN, DPS and OSBI— participated in each session. Additionally, two focus groups were conducted with a combined total of approximately 50 civilian employees of OSBI and DPS.

This report and its recommendations primarily are a distillation of the open and frank discussions that occurred during these meetings and from written comments submitted by front-line state law enforcement agents, investigators, troopers and agency employees. These committee meetings have been a treasure trove of indispensable insights and information.

Observations

Identity

It was surprising how little was mentioned about protecting the identities and preserving the histories and traditions of these three agencies. That is not to say that the participants did not believe it is important—they did. But nearly every time it was brought up, it was to acknowledge that if unification does occur, none of the people hired in 10 years will think anything about it. That is likely an astute prediction, to a point. It’s striking the number of individuals working in these agencies who have followed family members into the profession. There is little doubt that 10 years from now there will be a number of individuals who want to follow in their parent’s and grandparent’s footsteps by becoming a trooper, agent, or investigator. Identities *are* important and these agencies each have a rich heritage and proud tradition that must be preserved.

It was also encouraging because it shows a sincere and open-minded interest in the future of state law enforcement by those who do the work on the front-lines.

Themes

It is worth mentioning that in the many meetings and conversations, three themes came into focus, sometimes implied and sometimes explicitly stated. The themes centered on cultural considerations. The cultural themes recognized the need

for:

1. A culture of being *Intentional*;
2. A culture of *Competence*; and
3. A culture of *Follow Through*.

Each of these must become a consistent and organic cultural component of state law enforcement. It was recognized that each agency has and does demonstrate each of these important cultural elements to some extent, some of the time. But it has not been seen historically as a universal attitude permeating every aspect and level of state law enforcement in all critical areas consistently over time.

There can be no substitute for competence, especially the higher you go on the organization chart, for every individual in every position.

And, all the best ideas and plans will avail nothing without intentional effort and follow through.

RECRUITMENT

Law enforcement generally and state law enforcement specifically are experiencing a terrible recruiting environment that's expected to persist for the foreseeable future.

Young people who may be considering a career in law enforcement are likely only seeing the downsides and risks of being in law enforcement. The toxic narrative, hostile attitude, and violent attacks aimed at law enforcement are making the recruiting and retaining of high-quality and highly motivated law enforcement personnel increasingly challenging across the country. Too few of the type of high-caliber individuals we need to attract to state law enforcement are willing to embark on a career in which they will automatically be labeled a racist by many; there has been serious talk of eliminating or curtailing the qualified immunity protection for police; loud calls to defund police; unprovoked, random, violent and often deadly attacks upon uniformed law-enforcement officers; and unprecedented civil unrest and rioting. Challenges in Oklahoma hindering recruitment are the very low pay of state law enforcement personnel; the confusion and uncertainty faced by state law enforcement personnel caused by the McGirt decision; lack of dynamic career opportunities; and current morale.

There are also very real generational differences and expectations that are making it increasingly difficult to recruit and retain young people into the current model of state law enforcement. The career expectations of the younger generation must be addressed through constructive changes to state law enforcement. These changes should be incorporated into an attractive and aggressive recruitment plan highlighting the changes and the new career opportunities they represent.

A recruitment plan must also take into account the moral and cultural changes that continue to take place in society that are resulting in the disqualification of an increasing percentage of individuals who are considering a career in state law enforcement because they have engaged in certain actions and behaviors that are now socially acceptable.

A recruitment plan also must understand what other attractive career opportunities exist and are of interest to the type of individual we need to be recruiting. Increasingly, the ability to recruit and retain highly qualified and highly motivated individuals is predicated on having many professional opportunities, not just in career advancement opportunity such as promotions, but also opportunities to train and work in different areas and disciplines within law enforcement.

It warrants mentioning and emphasizing here, it's perhaps just as important to

understand and interpret this report in the context of law enforcement in the future, particularly the next 10 to 15 years, as it is law enforcement today or in the past.

Paths to Entry

Two main points of entry are recommended. The most significant entry point in terms of volume will naturally be the Oklahoma Highway Patrol. An equally important entry point will be the Commissioner's authority to commission individuals who have not entered the Department through the Patrol. This pathway is important for bringing individuals into the Department who possess specialized education, experience, training or credentials essential to the mission and work of the Department.

Recruitment Plan

A detailed comprehensive recruitment plan is needed. Recruitment efforts must be intentional, proactive, creative, appropriately and predictably funded, and thoughtfully developed and able to be quickly adapted to the ever-changing recruiting challenges and environment. At a minimum, the following elements and recommendations should be implemented and included in a recruitment plan:

- A clear presentation of the law enforcement career advancement opportunities within state law enforcement (detailed in this Report);
- A defined structure providing for additional pay for additional skills, additional duties, additional training, foreign languages, special certifications, etc.;
- Competitive pay;
- Enhanced longevity pay or regular, robust, and predictable step pay raises;
- Opportunity to work in a dynamic team environment;
- Gym membership or access to gym facilities (see the Facilities section of this Report);
- Time for physical fitness integrated into work schedules and pay incentives to maintain good physical fitness;
- 20 year retirement;
- Experience adventure, problem-solving, public and community service, camaraderie;
- Become a better person through challenging experiences and excellent training opportunities;
- Work with the latest and best technology and equipment;
- Great state benefits including annual leave, sick leave, healthcare benefits, etc.;

- Receive the best training available anywhere in the country;
- State to pay some or all higher education expenses toward degree completion;
- Protection through qualified immunity and the best training available;
- Ways to make state law enforcement attractive to more women and minorities;
- Ongoing training through reviews, skills academies, leadership academies, officer assistance programming, etc.;
- A robust officer assistance program including high-quality mental health services, peer assistance and family support;
- Excellent training facilities that include shooting ranges, physical fitness, driving courses, explosives ranges, tactical facilities, dormitories, classrooms, food service, etc.; and
- Must have regular, predictable academies, especially highway patrol academies, for any of the above to work.

Step pay raises are important to avoid a perverse incentive where individuals seek promotions into positions they may not be well-suited for and perhaps have little interest in simply so they may earn more money. If we have law-enforcement personnel that are “high speed, low drag” who wish to remain in the field doing what they love, they should be rewarded for doing so. This does not mean and should not be considered an endorsement of increasing the pay simply because someone does the necessary minimum.

A recruitment plan must include aggressive and targeted marketing based on reflection and research into the type of individuals we need to recruit. Historically, recruiting efforts have been, in part, passive in nature where we wait for the right people to show up. This is no longer working and must be addressed right away. Recruiting more women and minorities must be an important and intentional component.

We should begin an ongoing recruitment campaign appealing to young people to consider state law enforcement for a career. It should warn of disqualifying actions and behaviors, provide a clear pathway for entry into state law enforcement, a list of highly desirable attributes in prospects, new career opportunities available in state law enforcement, and so on. This campaign should work with middle schools and high schools, colleges and universities. It should partner with student organizations likely to have memberships complementary to the State’s recruiting needs such as foreign language groups, debate clubs, student leadership organizations, chess clubs, shooting and archery clubs, athletic programs, and so on.

When working with middle school and high school students, they should be encouraged to pursue concurrent enrollment while in high school to get a head start on accumulating the necessary minimum college hours to enter state law enforcement.

TRAINING

It is recommended that training become its own division within the unified command structure and that the head of this division reports directly to the head of the unified command structure. There seems to be broad agreement conceptually that a Training Division should be responsible for the following:

- Establish qualifications for trainers; identify, cultivate and recruit the highest caliber trainers possible; and ensure fidelity to the highest training standards. It was clear from the discussions that there have been poor trainers from time to time, to put it nicely. We owe it to the men and women in state law enforcement, not to mention the tax payers, to make sure this does not happen;
- Provide career path counseling or cooperate closely with career path counselors within the agency to provide the highest levels of alignment of initiative, talent, interests, and the needs of the agency with the broadest set of high quality training opportunities;
- Shadowing and mentoring programs;
- Endeavor to provide agency law enforcement personnel with degree completion opportunities through direct funding or reimbursement for the cost of degree completion or through arrangements with colleges and universities, or a combination of both;
- Proactively work with human resources on recruitment plan development;
- Proactively work with the various law enforcement divisions within the agency to establish a well understood and perpetual effort to build a deep and comprehensive management and leadership bench by continually analyzing the dynamic needs of each division or department; and
- Develop a high quality training program for Field Trainers (FT⁷) and assist in identifying and recruiting the best possible candidates into this program to ensure the best possible outcomes for those in field training. It is highly recommended that additional incentives also be developed and made available for field trainers. FT is an absolutely critical aspect of enhancing state law enforcement and must not be approached in a haphazard, we'll-take-who-we-can-get approach. FT is one of the most influential contributors to the future health of the organization.

⁷ For simplicity, FT is used to refer to *field trainers* or *field training* as indicated by context, rather than using the more thorough but cumbersome *field training officer*, *field training trooper*, *field training agent*, or *field training investigator*.

There was a fair amount of discussion about the need for state-of-the-art training facilities along with the merits of a centralized training center versus a regional training centers approach. Training is paramount to this profession and state-of-the-art facilities for these men and women to routinely train is equally paramount. No such dedicated comprehensive “one stop shop” facility currently exists for these three agencies. Training is foundational in law enforcement. Training is essential to the effective, efficient and Constitutional enforcement of laws; it undergirds and supports all aspects of law enforcement.

Individuals recruited into this entity as state law enforcement officers should be selected, in part, on their ability to think critically, solve problems, and communicate effectively. And at every opportunity this agency should incorporate intentional ways to further develop these essential attributes.

PROMOTION

The phrase “career opportunity” as it is used in this report should generally be understood to refer to the opportunities to develop competencies, not to gain a position. This notion should be understood to apply to promotions, lateral transfers, and management and supervisory positions.

The recommended steps and considerations for promotions:

1. Selection Process:
 - Establish comprehensive, well-rounded professional standards for each position;
 - Anonymize review and selection process as much as possible;
 - Integrity and fidelity of the selection process guided and guarded by Training Division;
 - Require peer input or recommendations; are/were they a good partner?;
 - Guard against “paper tigers,” meaning a person who looks good on paper but in actuality is not effective; and
 - The proposed Public Integrity Unit to protect processes and guard against political influence;
2. Promote;
3. Training; and
4. Probation; Supervising Training Period (STP).

Again, clear career paths should be established and posted and career counseling be made available, similar to college degree plans and academic counseling.

It was suggested that appropriate representatives from other divisions could be integrated into a promotion system. More information on candidates for promotion is needed. It was recommended that some standardized method be established to measure or ascertain if someone has demonstrated the requisite skills to be considered for a promotion and upon which they will be evaluated after promotion. Support for mandatory interviews of top candidates before a promotion is made was expressed. Some discussion on term limiting supervisor positions took place but concerns were raised about the impact on rural areas. A formal process for peer interviews and recommendations, perhaps even anonymized reviews, should be incorporated. Supervisors need to be better on P&P specifically and accountability generally.

LATERAL TRANSFERS

It was mentioned that better intel sharing among divisions would be a positive consequence of a unified command structure that facilitates lateral transfers in conjunction with a new, enhanced training paradigm designed around this approach.

There was general support for written exams with anonymized grading being the first screening level; scenario-based questions and role-playing; evaluation of a person's judgment; evaluation of writing and communication skills; understanding of laws and policies; followed by interviews.

Must meet all other educational, training and experience qualifications prescribed for any position into which one is seeking transfer or promotion.

Will need to address how to prevent the loss of pay for high-caliber candidates who transfer laterally.

SUPERVISORS

It was widely recognized that it's difficult to predict accurately which individuals who get promoted will actually turnout to be good supervisors. Because this is true, mistakes are made when promoting some individuals into supervisory positions—mistakes which too often are slow to be corrected, if at all. This combined with a lack of training and proper equipping of individuals promoted to supervisor is a recipe for poor morale.

The attributes which makes someone an excellent trooper, agent, or investigator in the field, often attracting justified positive attention, may not translate easily or adapt quickly to a supervisory position. There are multiple supervisory levels within each organization. Depending on the organization and the level of supervision and associated responsibilities with each supervisory level, new supervisors are likely to be faced with new responsibilities for which they may be ill-suited and un-trained such as organizational budgeting; quartermaster responsibilities; human resources; the well-being of each subordinate including their physical, mental, and emotional health; schedule management; balancing competing needs inside a close knit organization; significantly more time on administrative duties instead of law enforcement work; the marshaling and allocation of large and complex sets of resources; or compliance duties.

Robust training customized for every supervisory position should be developed and immediately required upon appointment. Doing so will best prepare individuals assuming these new responsibilities to be successful. There is a big difference between a person who is a leader and one who is a manager. They are different mindsets and skill sets. Every supervisory position will naturally require some measure of each. Each position and each candidate being considered for the position should be thoughtfully evaluated to determine the appropriate level of each attribute necessary. There should be robust training designed to develop strong and effective leaders— a true leadership Academy. There should also be robust training designed to develop strong and effective managers. This mindset should begin before the first promotion, including when someone is assigned to FT.

There should be a sufficient probation period for each person appointed to a supervisory position, with clear and meaningful criteria by which to measure his or her performance, and regular meetings to discuss, counsel, and fine-tune training. Individuals who, once promoted and during or after the probation period for the promotion, fail to perform the prescribed duties must not be permitted to remain in the position. Individuals who are in management or leadership positions must perform at the highest levels.

It was strongly recommended that when considering a candidate for promotion into a supervisory position, that current and past supervisors be involved in a formal way in this process as they will have valuable perspectives.

Assuming high quality supervisors are in place, they should always be expected to and be responsible for identifying and cultivating and training informally the most promising prospects among their subordinates to become their potential replacement and future leaders within the agency. A part of a supervisor's or leader's job description and duty must always be the organic work of helping to identify and develop future supervisors and leaders. This must become intentional and cultural.

Leaders in an organization are responsible for setting the climate, which must become second nature. Leaders who are good at this instinctively and effectively monitor the morale of the organization as a whole and of the subordinates for which they are responsible and are always working to manage the nuances that affect morale.

Communication skills are extraordinarily important for anyone in law enforcement and only become more so as one is promoted into supervisory positions. They must be able to *effectively* communicate verbally, in writing, and by example what they want and the standards that are expected to be met.

Supervisors must have the courage to do what needs to be done, and the personal skills to effectively manage the consequences.

Team-based performance reviews with the development of a matrix should be implemented. This would facilitate placing individuals within a team or unit into the positions for which they are interested and best suited. Similarly, team-based enforcement was also recommended.

Micromanagement of subordinates was often cited as a major concern. Every effort should be made to identify micromanagement and to immediately correct this damaging practice. Micromanagement is a positive indicator of a lack of confidence—either a supervisor's lack of confidence in his or her subordinates or a supervisor's lack of confidence in his or her own performance. The presence of micromanagement indicates either a need for improved training of subordinates or improve training for supervisors, or both. In a healthy well managed organization there should be no need for and no place for micromanagement. It was noted that supervisors equate "problems" with "paperwork" and, therefore, often believe micromanaging subordinates reduces paperwork.

COMPENSATION

An often repeated recommendation was the need to implement pay incentives for higher education courses and degrees relevant to law enforcement; special duty assignments; special skills such as fluency in foreign languages; relevant technical skills; and the like. Enhancing longevity pay or establishing a robust step pay raise system was also recommended.

We are in the bottom nationally in pay and very low pay when compared to other large law enforcement agencies in the state.

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Current OHP Salary Ranking						
Ranking	Agency	Salary	Retirement	Longevity	Education Incentive	Total
1	Edmond	97,009.77	13,050.67	2,000.00	1,380.00	113,440.44
2	Moore	88,778.28	13,008.54	9,667.44	1,620.00	113,074.26
3	Broken Arrow	85,855.33	11,616.19	2,000.00	1,500.00	100,971.52
4	OKC	83,248.56	12,291.36	9,500.40	1,800.00	106,840.32
5	Norman	81,986.00	11,121.24	1,924.00	1,638.00	96,669.24
6	Stillwater	81,900.00	11,102.00	2,000.00	1,500.00	96,502.00
7	Tulsa	79,990.00	10,929.10	2,880.00	1,200.00	94,999.10
8	Midwest City	77,062.48	10,579.72	2,500.00	1,820.00	91,962.20
9	OHP	71,980.32	8,181.84	2,400.00	-	82,562.16
10	Lawton	69,056.00	9,356.52	2,917.20	-	81,329.72
11	Enid	61,795.23	8,392.57	1,563.00	1,200.00	72,950.80

OHP Salary Ranking with 10% Increase						
Ranking	Agency	Salary	Retirement	Longevity	Education Incentive	Total
1	Edmond	97,009.77	13,050.67	2,000.00	1,380.00	113,440.44
2	Moore	88,778.28	13,008.54	9,667.44	1,620.00	113,074.26
3	Broken Arrow	85,855.33	11,616.19	2,000.00	1,500.00	100,971.52
4	OKC	83,248.56	12,291.36	9,500.40	1,800.00	106,840.32
5	Norman	81,986.00	11,121.24	1,924.00	1,638.00	96,669.24
6	Stillwater	81,900.00	11,102.00	2,000.00	1,500.00	96,502.00
7	Tulsa	79,990.00	10,929.10	2,880.00	1,200.00	94,999.10
8	OHP	79,178.35	8,973.62	2,400.00	-	90,551.97
9	Midwest City	77,062.48	10,579.72	2,500.00	1,820.00	91,962.20
10	Lawton	69,056.00	9,356.52	2,917.20	-	81,329.72
11	Enid	61,795.23	8,392.57	1,563.00	1,200.00	72,950.80

⁸ Source: Department of Public Safety

OHP Salary Ranking with 20% Increase						
Ranking	Agency	Salary	Retirement	Longevity	Education Incentive	Total
1	Edmond	97,009.77	13,050.67	2,000.00	1,380.00	113,440.44
2	Moore	88,778.28	13,008.54	9,667.44	1,620.00	113,074.26
3	OHP	86,376.38	9,765.40	2,400.00	-	98,541.79
4	Broken Arrow	85,855.33	11,616.19	2,000.00	1,500.00	100,971.52
5	OKC	83,248.56	12,291.36	9,500.40	1,800.00	106,840.32
6	Norman	81,986.00	11,121.24	1,924.00	1,638.00	96,669.24
7	Stillwater	81,900.00	11,102.00	2,000.00	1,500.00	96,502.00
8	Tulsa	79,990.00	10,929.10	2,880.00	1,200.00	94,999.10
9	Midwest City	77,062.48	10,579.72	2,500.00	1,820.00	91,962.20
10	Lawton	69,056.00	9,356.52	2,917.20	-	81,329.72
11	Enid	61,795.23	8,392.57	1,563.00	1,200.00	72,950.80

OHP Salary Ranking with 30% Increase						
Ranking	Agency	Salary	Retirement	Longevity	Education Incentive	Total
1	Edmond	97,009.77	13,050.67	2,000.00	1,380.00	113,440.44
2	OHP	93,574.42	10,557.19	2,400.00	-	106,531.60
3	Moore	88,778.28	13,008.54	9,667.44	1,620.00	113,074.26
4	Broken Arrow	85,855.33	11,616.19	2,000.00	1,500.00	100,971.52
5	OKC	83,248.56	12,291.36	9,500.40	1,800.00	106,840.32
6	Norman	81,986.00	11,121.24	1,924.00	1,638.00	96,669.24
7	Stillwater	81,900.00	11,102.00	2,000.00	1,500.00	96,502.00
8	Tulsa	79,990.00	10,929.10	2,880.00	1,200.00	94,999.10
9	Midwest City	77,062.48	10,579.72	2,500.00	1,820.00	91,962.20
10	Lawton	69,056.00	9,356.52	2,917.20	-	81,329.72
11	Enid	61,795.23	8,392.57	1,563.00	1,200.00	72,950.80
		Current Average Total for Local Law Enforcement Agencies				96,873.96
		Current Total for OHP				82,562.16
		Difference				14,311.81
		Difference as percentage				17.33%

Law Enforcement Pay Analysis ⁹

Oklahoma Highway Patrol

OHP Troopers are ranked, and paid, based on a 7-step system. Prior to Step 1, recruits are ranked as OHP Cadet (during the academy) and OHP Probation (upon graduation). These two rankings are not included in this analysis. Additionally, these calculations are based on data as of 10/04/2021 and do not reflect any personnel changes that may have occurred after that date.

OHP Trooper count as of 10/04/2021:

	Troopers	Total Base Salary Cost
Steps 1-6	142	\$ 8,060,620.12*
Step 7	432	\$ 30,836,160.00
Total	574	\$ 38,896,780.12

*This is the cumulative base salary total for all Step 1-6 Troopers. Base pay increases by an average of 6.32% with each step.

Step 7 Trooper salary breakdown:

Base Salary	\$71,380.00
Shift Differential (per year)*	\$600.00
Uniform Allowance (per year)*	\$1,800.00
Total	\$73,780.00

*All Troopers regardless of Step receive the same annual Shift Differential and Uniform Allowance.

The results of an OHP workforce study conducted in 2018 determined at that time the minimum number of Troopers recommended to maintain critical functions to be 832. To reach this number from 10/04/21 levels, OHP would need to hire an

⁹ Source: Senate Fiscal Staff

additional 258 Troopers. A separate study looking for the optimum number of Troopers correlated to highway miles and other relevant factors determined the number to be more than 1,000 Troopers.

	Total	Base Salary	Total Salary Cost
Lieutenant	101	\$ 78,983.64	\$ 7,977,347.64
Captain	32	\$ 86,686.80	\$ 2,773,977.60
Major	6	\$ 94,560.00	\$ 567,360.00
Deputy Chief	3	\$ 103,881.86	\$ 311,645.58
Total	142		\$ 11,630,330.82

Oklahoma State Bureau of Investigations

OSBI Agents are classified, and paid, based on a 3-step system. These calculations are based on data as of 9/21/2021 and do not reflect any personnel changes that may have occurred after that date.

Additionally, the agency is in the process of implementing additional grade and salary increases within the Agent III classification effective 11/01/2021.

OSBI Agent count as of 9/21/2021:

	Total Agents	Base Salary	Total Salary Cost
Agent I	1	\$ 52,401.92	\$ 52,401.92
Agent II	9	\$ 61,600.00	\$ 554,400.00
Agent III	55	\$ 71,990.00	\$ 3,959,450.00
Total	65		\$ 4,566,251.92

Agent III salary breakdown:

Base Salary	\$ 71,990.00
Callback Pay (per year)*	\$ 1,920.00
Total	\$ 73,910.00

*All Agents regardless of level receive the same annual Callback Pay.

	Total Agents	Base Salary	Total Salary Cost
Agent IV	15	\$ 79,000.00	\$ 1,185,000.00
Agent V	7	\$ 86,700.00	\$ 606,900.00
Agent VI	2	\$ 114,900.00	\$ 229,800.00
Assistant Director	1	\$ 125,000.00	\$ 125,000.00
Total	25		\$ 2,146,700.00

Oklahoma Bureau of Narcotics and Dangerous Drugs

OBNDD Agents are classified, and paid, based on a 3-step system. Within the Agent III classification there are additional grade and salary increases based on how many years an agent has served as an Agent III. This analysis focuses solely on the base pay for an Agent III. Additionally, these calculations are based on data as of 9/20/2021 and do not reflect any personnel changes that may have occurred after that date.

OBNDD Agent count as of 9/20/2021 with salary breakdown:

	Total Agents	Salary	Total Salary Cost
Agent I	5	\$ 52,401.92	\$ 262,009.60
Agent II	22	\$ 61,600.00	\$ 1,355,200.00
Agent III	15	\$ 71,990.00	\$ 1,079,850.00
Total	42		\$ 2,697,059.60

OBNDD Agents do not receive annual compensation for Shift Differential, Uniform Allowance, or Callback Pay.

	Total Agents	Base Salary	Total Salary Cost
Agent IV - AAIC	4	\$ 79,000.00	\$ 316,000.00
Agent V - AIC	15	\$ 86,700.00	\$ 1,300,500.00
Agent VI - Chief Agent	4	\$ 114,900.00	\$ 459,600.00
Deputy Director	1	\$ 125,000.00	\$ 125,000.00
Total	24		\$ 2,201,100.00

Pay Parity Between OHP, OSBI, and OBNDD

Excluding shift differential, uniform allowance, and callback pay, the difference in base pay for Step 7 Troopers and base pay for an OSBI and OBNDD Agent III is \$610.00. The cost to bring all 432 Step 7 Troopers to \$71,990.00 amounts to an increase of \$263,520.00 per year above the 10/04/21 total.

The difference in base pay for an OHP Lieutenant and an OSBI and OBNDD Agent IV is \$16.36. The cost to bring all 101 OHP Lieutenants to \$79,000.00 an increase of \$1,652.36 per year above the 10/04/21 total.

The difference in base pay for an OHP Captain and an OSBI and OBNDD Agent V is \$13.20. The cost to bring all 32 OHP Captains to \$86,700.00 amounts to an increase of \$422.40 per year above the 10/04/21 total.

The difference in base pay for an OHP Major and an OSBI and OBNDD Agent IV is \$20,340.00. The cost to bring all 6 OHP Majors to \$114,900.00 amounts to an increase of \$122,040.00 per year above the 10/04/21 total.

The difference in base pay for an OHP Deputy Chief and Deputy/Assistant Director at OSBI and OBNDD is \$21,118.14. The cost to bring all 3 OHP Deputy Chiefs to \$125,000.00 amounts to an increase of \$63,354.42 per year above the 10/04/21 total.

At 10/04/21 levels, the total cost to bring these OHP personnel salaries in line with the equivalent OSBI and OBNDD personnel amounts to \$450,989.18 per year.

It was suggested that the Commissioner should have the authority to create the rank of sergeant in the Narcotics and Investigations Divisions. Adding the rank of

sergeant in these divisions will provide a mechanism to help balance the pay scale. It was pointed out that patrol functions most commonly include scheduled shifts, which affords patrol officers the opportunity to work numerous overtime shifts and off-duty security details to supplement their income. Investigative functions like that in Narcotics and Investigations, on the other hand, do not accommodate such opportunities because of perpetual on-call statuses, and the need to minimize the potential for developing conflicts of interest in the case of OSBI agents.

The result of such differences is that commissioned officers assigned to patrol often earn considerably more. For this reason, criminal investigators and agents at the federal level and within unified organizations from other states, maintain rank structures or additional pay incentives to correct the offset. Therefore, it was recommended that the Commissioner be authorized to create a sergeant rank to address this nuance.

FACILITIES

The following were recommended for regional headquarters:

- Kitchen
- Laundry
- Conference rooms
- Classrooms
- Interview rooms
- Individual locking offices (currently required by law in some circumstances)
- Evidence storage
- Wire monitoring room
- Gym facilities with locker rooms
- Armory
- Fencing of parking area

The following were recommendations for a training facility:

- Driving courses including a long track pistol and rifle facilities with sufficient capacity to meet demand (indoor facilities preferred)
- Explosives training range
- Modular classroom space
- Audiovisual broadcast capability
- Indoor “Simunition” course for tactical training
- Housing for academies and transient personnel
- Food service
- Laundry
- Virtual training systems
- It was mentioned that Metro Tech is developing new law enforcement training facilities
- Kids academies and camps

The following were considerations for storage facilities:

- Sees the vehicle storage indoors
- Mobile command posts

- Long-term evidence storage
- ATVs
- Ammo
- Equipment

Any facilities plan must include plans for future expansion. It was mentioned by several that Stillwater Police Department did a good job of this with the construction of facilities recently. Several people said that room for storage was always running out.

PUBLIC INTEGRITY DIVISION

Considerable time and attention has been given by the Commission and the focus groups to recommendations for preventing and addressing public corruption. A virtual meeting November 1, attended by several members of the Commission and representatives from the Federal Bureau of Investigation and an acting United State Attorney, discussed best practices for a public integrity unit.

Public integrity includes fraud and corruption by government officers and employees of the State and of its political subdivisions. The employees and assets of this unit must be protected so they are not diverted from the units primary mission. The following recommendations come directly from these discussions and meetings.

- A dedicated public integrity unit should be established. The Commissioner should appoint the Chief of the Public Integrity Division, who shall report directly to the Commissioner.
- The Public Integrity Division should be authorized to and be responsible for investigating any elected or appointed state, county, or political subdivision officer or employee whenever there is sufficient basis to suspect bribery, corruption, forgery or perjury or any other crime related to an officer's or employee's duties, or related to campaign contributions or campaign financing.
- The offices, records, communications, information technology, equipment, evidence and any other resources of the Public Integrity Division should be located and maintained separately from that of the other divisions within the Department. Great care and every effort should be made to minimize the number of people with access to and knowledge of investigative activities by this unit. Confidence in the confidentiality and integrity of investigative actives by this unit must be jealously guarded.
- Investigators assigned to the Public Integrity Division should maintain the confidentiality of the investigative activities of the Division during and after their service in the Division.
- Investigators assigned to this unit must come from among the most elite, highest performing investigators. Investigators should possess the education, training and experience typically needed in public corruption investigations. This is absolutely essential because of the inherent difficulty in assessing the value of work performed by investigators in this law enforcement environment. It is important to understand that it takes just as much effort to clear someone of wrong-doing through an investigation as it does to determine that there was

criminal activity. Typically, public corruption investigations are lengthy, often lasting years. It is extraordinarily difficult, if not impossible for supervisors to quantify or reduce to statistics the performance of investigators in a public corruption unit. So it is of vital importance to select investigators who are proven high performers of unquestionable integrity for this unit.

- It is recommended that upon the establishment of a public integrity unit within the Department, that a joint task force be created to include the public integrity unit, the FBI, the three U.S. Attorneys in Oklahoma. It is our studied opinion and strong believe that this arrangement will help prevent political abuse from outside the unit and from abuses from within the unit. It is strongly recommended that investigators in the unit begin coordinating with relevant prosecutors as early in the investigative process as possible to avoid wasting resources by pursuing investigations lacking merit or making mistakes in the course of investigations that jeopardize the validity of the investigative process and product.
- Strong technology and evidence controls must be implemented. The Department should take all necessary and appropriate steps to ensure the confidentiality and integrity of all investigative activity of the Division. The Department should timely and thoroughly investigate apparent or suspected information leaks to determine the source, and take appropriate disciplinary or corrective action if the source is determined to be inside the Division.
- It's strongly recommended that the revenue and budget for this unit should be independent of the Department and jealously guarded. The budget of the Public Integrity Division should be protected by the Department to ensure it has the resources to carry out its primary mission.

The public integrity unit investigates suspected criminal activity and therefore should not be responsible for internal affairs or professional standards within the Department, which are administrative in nature.

Regarding both the Public Integrity Division and OSBI Division, the Commission recommends adoption of a new statute as an additional protection against inappropriate interference in investigations:

In any instance where someone with an interest in an investigation attempts to influence the direction of the investigation toward a desired outcome inconsistent with and in conflict with the Department's investigation, the Department employees who witness the attempt should be required by law to inform the person making the attempt that doing so is felony. If the person persists, the Department employees who witness the attempt should be required

by law to report the attempt to the division director. The division director should then be required by law to investigate the alleged attempt and, if substantiated, provide the report to the appropriate prosecutor who shall file appropriate charges.

MENTAL WELLNESS DIVISION

The Department should establish and maintain a Mental Wellness Division to provide mental wellness services and programs to public safety personnel to promote good mental wellness. The Commissioner should appoint the division director of the Mental Wellness Division. The Director of the Mental Wellness Division should report directly to the Commissioner.

All current and former employees of the Mental Wellness Division should maintain the privacy of all public safety personnel served by the Division or who participate in its programs. No privileged personal health information should ever be shared with the Commissioner, or made public without the consent of that person. However, aggregate mental health information may be shared with the Commissioner. Aggregate mental health information may be made public by the Commissioner if, in the judgement of the Commissioner, doing so could improve public safety mental wellness policies for public safety personnel and is made public for this sole purpose. Provided, no aggregate mental health information should ever be shared or made public if doing so could reveal otherwise privileged personal mental health information about any specific individual.

The Director of the Division should establish the necessary policies and procedures to ensure the privacy and confidentiality requirements of this section and of all other applicable health privacy laws are followed.

Any breach of the privacy provisions of this section and of any other applicable health privacy laws must be timely and thoroughly investigated and the appropriate disciplinary and corrective actions taken.

The Mental Wellness Division should be authorized to enter into partnerships with private entities to better fulfill its mandate.

The offices, records, communications, information technology, equipment and any other resources of the Mental Wellness Division should be located and maintained separately from that of the other divisions within the Department.

To facilitate the envisioned public private partnerships, the Commission further recommends that a revolving fund be created for the Oklahoma Department of Public Safety on behalf of the Mental Wellness Division. We further recommend that the Legislature authorize the establishment of a not-for-profit foundation to raise funds for the Mental Wellness Division Revolving Fund. The foundation created pursuant to this section may receive funds from any public or private source to carry out the purposes of this division. The revolving fund should be a continuing fund, not subject to fiscal year

limitations, and should consist of those monies appropriated to the fund by law or deposited in the fund by the authorized foundation.

All monies accruing to the credit of the fund are hereby appropriated and may be budgeted and expended by the Mental Wellness Division for the purpose of providing mental wellness services and programs to public safety personnel. Expenditures from the fund shall be made upon warrants issued by the State Treasurer against claims filed as prescribed by law with the Director of the Office of Management and Enterprise Services for approval and payment.

The Commission further recommends adoption of the following proposal which was prepared for and submitted to the Commission by Oklahoma Highway Patrol Trooper Danny Long:

PROJECT: Oklahoma Public Safety Mental Wellness Division

Goals:

- 1. Develop a public safety mental wellness division for public safety personnel in Oklahoma.*
- 2. Develop the train-the-trainer program so that the mental wellness division can be replicated throughout other agencies, to include state, county and municipal, beginning with law enforcement and expanding to all public safety personnel and First Responders across the state.*
- 3. Change state training requirements for public safety personnel to require personnel-mental wellness training hours.*
- 4. Design, build and maintain a public safety personnel Mental Wellness Center, centrally located, with the potential of more added, long-term, across the state.*

Justification:

Law Enforcement Officers and other First Responders carry an enormous responsibility to save lives and to protect people (from others and themselves). Because of this role, the public places an exceptionally high standard on public safety personnel, with their job performance as well as their behavior, on and off the job. However, these jobs & careers expose personnel to the worst situations, people and experiences, as well as an abundance of negativity, hatred, violence and dangerous encounters. These experiences negatively affect brain chemistry, one's worldview, and the ability to treat oneself and, in turn, others, in a humane and positive way. In order for public safety personnel to be their best possible selves on the job (and off), extensive attention needs to be given to their mental health and overall well-being. This program initiative is designed to heal, restore, and create mental wellness in public safety personnel, with the most significant effects being

on-the-job strength and focus, more positive interactions with the public, and fewer challenges personally, creating a holistically better public safety workforce.

Short- and Long-Term Plan:

Year 1

Months 1-6:

- *Train all commissioned members as Peers (online & on-site)*
- *Restructure Officer Assistance Program or OAP*
- *Strategy development*
- *Develop statewide training classes (online and on-site)*
- *Develop peer support processes and training*
- *Develop crisis intervention processes and training*
- *Establish proactive resiliency methods and goals*
- *Create trusted resource list, including vetted counselors*
- *Create peer support community/statewide network*
- *Develop return-to-duty standards and procedures*
- *Develop debriefing, intervention, service and resource connection tracking / reporting process*
- *Create support group platform*
- *Distribute counselor training for cultural competency*
- *Develop train-the-trainer instructor certification program*
- *Implement smartphone app for all participants to receive resources & information*

Months 7-12:

- *Public education regarding Mental Wellness initiatives*
- *Implementation of the above training, programs, processes and resources*
- *Measurement of the success of the above*

Year 2

Development of the Train-the-Trainer program of the model developed in year 1, and distribution of that training (with both on-site and online options), so that other departments may create this same mental wellness initiative, for a statewide standardized and high quality level of care for LEO's and other First Responders.

Year 3

Using the mental wellness initiative created in year 1, and the success of the replication and expansion of the initiative into other departments as its model, a Mental Wellness Center will be designed, planned and built for statewide use by those who have implemented the mental wellness initiative into their department. The Mental Wellness Center will be at a detached and separate location from any agency HQ or office location, providing gated/coded access, a remote and safe location, and a supportive culture and environment.

The Mental Wellness Center will include:

- *Offices for counselors to meet with participants – independent counselors may meet clients, if they have gone through our rigorous vetting and/or cultural competency training process;*
- *Training center – training classes will be held on-site as well as in an online format, with topics covering holistic health – nutrition, fitness, spiritual wellness, financial health, mental health, peer support, crisis intervention, etc.;*
- *Mental Wellness Program support – we will provide support for those departments who have implemented the mental wellness initiative in their department;*
- *Physical & Mental Well-Being Center (gym, yoga, meditation, etc.);*
- *Coffee/Café – a place for social interaction & support among peers, drinks & snacks, etc.;*
- *Debriefing & 1-on-1 rooms;*
- *Chapel / spiritual focus area;*
- *Sleep Deprivation support center*
- *Outdoor relaxation and restoration area – patio, chairs, tables, etc.*
- *Possible hobby area – to promote a return to balance, retirement prep, etc.*

Year 4

Expand the Mental Wellness Initiative into more departments, including more departments and responders into the Mental Wellness Center. Assess, re-assess, and adapt to meet changing needs, participant feedback, and potential increased funding.

Year 5

Increase types of participants, responder disciplines, etc. – law enforcement, fire, EMT/paramedic, 9-1-1

Continue to assess, re-assess, and improve the program based on feedback.

Continue improving the Mental Wellness Initiative program and continued training with original participants as well as adding new participant departments.

Continue the education of the trained trainers, peer support personnel, and continue to grow the list of trusted resources statewide.

Continue adding trainers, and classes, as well as new mental health and wellness initiatives across the state, making the Mental Wellness Initiative available and convenient for First Responders no matter where they are located in Oklahoma.

Funding Needs:

Years 1-3:

- *Office space for 3-4 plus conference room – separate from DPS workspace.*

- *Consultation & meeting room in the agency main personnel building – so that we can learn from them in their own environment.*
- *Remove Mental Wellness Team from DPS operations*
- *Academy Hour contract – Academy Hour provides a mental health professional experienced with law enforcement and other First Responders, as well as staff already in place to support the above outlined plan and needs. On staff are training content development staff, customer service staff, administrative support staff, as well as 2 curriculum specialists with advanced degrees – one Licensed Clinical Social Worker and one with a Master’s of Education. Academy Hour also may provide office space if needed.*
- *Supplies – training materials, promotional materials, etc.*
- *Travel expenses – within Oklahoma.*

Years 3+:

- *Mental Wellness Center building, staff, etc.*

Other Needs:

More than anything we need the absolute, unfailing support of leadership, the legislature, the cabinet secretary, the governor and every single person involved in making this initiative a reality.

OPERATIONS

It is recommended that continued provisions be made to permit the Department to maintain specialized purchasing authority and assets.

A unified agent should be exemption from the Information Technology Consolidation and Coordination Act (62 OS 35 et al) in more direct wording than was in the initial draft. The unique duties, systems and confidentiality of law enforcement information technology programs makes it necessary for this exemption. The freedom to employ backgrounded personnel, react quickly, modify complex systems, create new systems and procure specialized equipment makes this exemption a necessity.

It is also recommended that a Criminal Justice Information Systems (CJIS) Division be created. The Oklahoma Law Enforcement Telecommunications System (OLETS/DPS) works hand in hand with the OSBI Computerized Criminal History (CCH) system. All criminal history searches done by law enforcement throughout the country hit OLETS before being routed to CCH and then back through OLETS to the requestor. In most states, these two functions reside in the same agency. Unification presents a unique opportunity to marry these functions. This division would logically include Information Technology functions to support the myriad of systems that support law enforcement agencies throughout the state like the Automated Fingerprint Identification System (AFIS), Offender Data Information System (ODIS), State Incident Based Reporting System, Criminal History Information Request Portal (CHIRP) and many more that should be included in the CJIS Division. Including a CJIS Division would result in obvious efficiency benefits.

It is also recommended that a Forensic Science Division be created. The OSBI's Criminalistics Division provides forensic evidence analysis for the entire state. Creating these two divisions allows leaders of the sworn law enforcement divisions (OHP, OBN, and OSBI) to focus on pure law enforcement.

GOVERNANCE

The Commission recommends the following governance structure for a unified law enforcement agency:

A five member board should be established with responsibilities limited to appointing and discharging the Commissioner of the unified agency, and reviewing the performance of and setting the compensation for the Commissioner. As this board will exercise executive authority, the Constitution of Oklahoma requires that the majority of the members of the board be from or appointed by the executive branch. The recommended composition of the board is the:

1. Governor or designee serve as chairperson,
2. Lt. Governor or designee
3. Secretary of Public Safety
4. President Pro-Tempore of the Senate or designee, and the
5. Speaker of the House or designee.

It is important to note that the members of the board should be subject to the same provisions and prohibitions regarding the integrity of investigations outlined in this report. It is also recommended that employment protections be put in place to protect front-line commissioned officers and their immediate supervisors from retaliation.

Concern has been expressed by some that the new position of commissioner of the unified agency as recommended in the report will be too powerful while others have expressed concern that the new board will be too powerful and political, wreaking havoc on the new unified agency. Considering the exclusive nature of these two concerns, it seems inconceivable that both could prove true. So, if they both cannot be true, can one of the two become true and which one?

This Commission took these concerns to heart and recognized that its recommended governance structure must include provisions to avoid these perils. The recommended governance structure outlined in the final report, along with several specific provisions included in the report, are believed by this Commission, with the previously noted exception, to strike a balance expected to make either scenario unlikely.

This Commission does not recommend that a single political leader exercise complete control of the proposed unified agency. Further, it also does not recommend

complete autonomy from all political leadership. A healthy balance between these two poles, with appropriate safeguards, is needed.

This Commission understands that elections have consequences. That said, Oklahomans strongly support law enforcement and for political leaders to be successful they must respect this sentiment. If public sentiment were to shift in the future in opposition to law enforcement there would be unfortunate consequences. But those consequences could be realized with the current structure.

There is no perfect structure that can guarantee to prevent all misbehavior. After all, people will always be involved and that means that human nature is always in play—good and bad.

CONCLUSION

The recommendations in this report requiring consideration and action by the Legislature, in whole or in part, are as follows:

Mental Wellness

- Fund the *Oklahoma Public Safety Mental Wellness* Division
- Pass necessary legislation to facilitate a public private partnership between the Wellness Division and outside entities who wish to provide funding or services, or both

Recruitment

- Immediately establish pay parity between comparable ranks and positions between the three entities
- Immediately take steps to increase compensation for the personnel of these three entities to a competitive pay position
- Provide sufficient annual funding for new recruit training academies to stop the net decline in frontline personnel and increase the ranks to targeted levels to optimize state law enforcement and public safety efforts by the State

Retention

- Immediately establish pay parity between comparable ranks and positions between the three entities
- Immediately take steps to increase compensation for the personnel of these three entities to a competitive pay position

Training

- Provide funding for a comprehensive training facility
- Provide sufficient annual funding for new recruit training academies to stop the net decline in frontline personnel and increase the ranks to targeted levels to optimize state law enforcement and public safety efforts by the State

Unification

- Unify state law enforcement as outlined in this report by appropriate legislation

Again, it is our studied position and strong belief that addressing only one or two or three of these areas of concern during the next one or two legislative sessions will be wholly insufficient to meet the current crisis and reverse its snowballing consequences. Only the most significant effort over a sustained period of time by this and future Legislatures and governors will be sufficient to meet the crisis. It is the opinion of this Commission, based on the many meetings and conversations with those on the front-lines who are dedicated to keeping their fellow Oklahomans safe, that these recommendations can best be accomplished under a unified command structure within a single Department.