



OFFICE OF THE CONTROLLER

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COUNTY CONTROLLER

DEPUTY CONTROLLER

TO: Josh Siegel, Lehigh County Executive
CC: Lehigh County Board of Commissioners
FROM: Office of the Controller
DATE: March 31st, 2026
RE: Risk-Based Hiring Standards for Law Enforcement Positions

EXECUTIVE SUMMARY

The County should not hire candidates for the Sheriff's Office or as Correctional Officers if their law enforcement experience was obtained at U.S. Immigration and Customs Enforcement (ICE) on or after January 20, 2025.

Any such candidate should undergo an individualized review by county leadership and legal counsel before being considered for hire. During that period, ICE cut basic training from five months to as little as six weeks, more than doubled its workforce, and ran an official recruitment campaign that extremism researchers at the Southern Poverty Law Center formally characterized as echoing white nationalist messaging. A former senior Department of Homeland Security official concluded that ICE is now "headed in the wrong direction" by attracting the wrong type of candidate entirely.

The financial stakes for Lehigh County are real. The mean cost of a police misconduct settlement nationally is \$3.87 million. Pennsylvania municipalities have paid approximately \$25.8 million in settlements since 2009. A single preventable incident by a poorly vetted officer can exceed the annual budget of an entire county department.

This document details the proposal and explains the related science. ICE's basic training falls below what we deem as acceptable. Sixty-three percent of ICE-related fatal force incidents in the national dataset are classified as an Appearance of Unjustified, the highest rate among the three agencies analyzed and above the 60% combined disqualifier level. Peer-reviewed research published in the Journal of Neuroscience establishes that under acute stress, officers revert to the behavioral patterns formed at their prior agency, not to retraining. The NYPD tested this against all 36,000 of its sworn officers. Retraining produced no detectable change in use-of-force behavior.

The broader recommendation of this report is that Lehigh County adopt a formal, uniform risk-based hiring framework covering all candidates with prior law enforcement experience, not just ICE. ICE is the clearest case. It is not the only one.

Recommendation. The Controller’s Office recommends that Lehigh County immediately suspend advancement of any law enforcement candidate with ICE experience obtained on or after January 20, 2025, pending individualized review by county leadership and legal counsel. For all candidates with prior law enforcement experience, Lehigh County should adopt the two-metric screening framework in this report and apply it uniformly. Any candidate who fails both thresholds should not advance without written authorization from county leadership and legal counsel. The financial exposure from a single preventable incident far exceeds the cost of getting this right.

Why Retraining Is Not a Sufficient Response

A hiring authority might argue that any ICE agent can be retrained to county standards. The peer-reviewed literature on police occupational socialization indicates that this argument underestimates the persistence of institutionally formed behavioral patterns. Training hours measure inputs. Institutional culture determines outputs. The judgment patterns formed under a prior agency, what constitutes a proportionate response, when to escalate or de-escalate, who is perceived as a threat, are not reliably reversed by subsequent formal retraining. When Lehigh County hires a former ICE agent, it is not simply hiring an individual with a measurable skills gap. The available evidence indicates it is also accepting exposure to institutionally formed behavioral patterns that retraining has not been shown to reliably correct.

The Science: Culture, Socialization, and the Limits of Retraining

Organizational socialization theory, developed by MIT’s John Van Maanen and Edgar Schein and published in peer-reviewed research beginning in 1973, indicates that initial socialization is a primary influence on a law enforcement officer’s subsequent behavior ([Van Maanen, 1973](#) [Van Maanen & Schein, 1979](#)). Van Maanen’s longitudinal study found that by the time officers reach the “metamorphosis” stage of their careers, they had substantially internalized the attitudes and values characteristic of their originating agency. Police culture shapes not just individual behavior but the cognitive lens through which officers interpret ambiguous situations: who is perceived as a threat, what constitutes a proportionate response, and whether escalation or de-escalation is the default ([College of Policing, 2021](#)). That lens is formed on the job, not in the classroom, and it persists across agency transfers.

Subsequent research found that the socialization effect was not substantially moderated by individual demographic differences. A study published in the *American Journal of Criminal Justice* ([Britz, 1997](#)) found that race, gender, age, military background, and prior experience did not substantially affect occupational identification or group solidarity. Institutional culture was the strongest predictor of occupational solidarity in the study population. Research by [Haarr \(2001\)](#), analyzing recruits over 16 months from academy through field training, found that organizational environment and culture, not formal training content, were the primary drivers of attitudinal change in officers. Field training, where informal cultural transmission from senior officers occurs, was found to be more formative than classroom hours in the studies reviewed. This is precisely why ICE’s exceptionally short training pipeline amplifies the cultural risk: there is less formal instruction to counterbalance whatever norms recruits absorb in the field.

The retraining counterargument is further undermined by the literature on implicit bias and stress decision-making. Research published in *Daedalus*, the journal of the American Academy of Arts and Sciences, by Jack Glaser, Professor of Public Policy at UC Berkeley, concludes that implicit biases governing split-second

use-of-force decisions are very difficult to reduce in any lasting or meaningful way through training ([Glaser, 2024](#)). Neurologically, use-of-force decisions made under stress engage the amygdala, the involuntary fight-or-flight pathway, not the deliberative prefrontal cortex. Anthony Greenwald, who developed the Implicit Association Test, stated in 2020 that he was “very skeptical about most of what’s offered under the label of implicit bias training.” Joshua Correll, who has studied implicit bias in policing for more than 20 years, concurs: “We don’t have any evidence that anti-bias trainings work.” The most rigorous field evaluation on record, covering all 36,000 sworn NYPD officers in 2018, found a moderate improvement in knowledge and a small impact on attitudes, but no detectable reduction in disparities in stops, arrests, or use of force ([Worden et al., 2020 Penn State Evidence-to-Impact Collaborative, 2024](#)).

The neuroscience of training transfer provides the final mechanism. An experiment published in the *Journal of Neuroscience* found that under acute stress, participants who had consciously learned new behavioral rules were significantly more likely to default to prior habituated responses ([Schwabe et al., 2009](#)). The mechanism is anatomical: the prefrontal cortex, which governs deliberate reasoning, is suppressed under acute stress, while the striatum, which encodes automatic stimulus-response habits, becomes dominant. A use-of-force encounter is precisely the high-stress context in which this neurological switch fires. In that moment, an officer does not retrieve consciously learned county policy. The brain retrieves the habituated pattern formed through thousands of field repetitions under the prior agency. Research in *Psychological Research* further confirmed that under working memory load, which acute stress reliably produces, the ability to apply newly transferred learning drops to chance levels while access to prior associations remains intact ([Balter & Raymond, 2023](#)). Under acute stress conditions, prior habituated responses were more likely to govern behavior than recently learned rules.

Taken together, this body of peer-reviewed research indicates that standard retraining protocols are not reliably sufficient to override force culture formed during prior agency service. The 63% rate of Appearance of Unjustified incidents is not a statistical artifact. It is a pattern indicator that, when read alongside the research on occupational socialization and stress-induced habit retrieval, suggests elevated risk of force-related incidents. The literature reviewed does not support the assumption that standard retraining will reliably correct behavioral patterns formed under these institutional conditions.

ICE’s Recruitment Campaign: A Compounding Risk

The cultural risk described above is not fixed; it has been actively worsened by ICE’s recent hiring practices. Since 2025, ICE more than doubled its workforce, from approximately 10,000 to over 22,000 officers, while simultaneously cutting basic training from roughly five months to as little as six to eight weeks, eliminating Spanish-language requirements, and waiving prior age restrictions ([KPBS, Sept. 2025 Government Executive, Jan. 2026 NPR, Jan. 2026](#)). Organizational socialization research predicts that compressed training paired with rapid headcount expansion will accelerate informal cultural transmission from senior to junior officers while reducing the counterbalancing influence of formal instruction. The conditions ICE has created are precisely those the academic literature identifies as most likely to entrench and intensify existing agency culture rather than moderate it.

The composition of ICE’s expanded workforce is a matter of documented public record relevant to this risk assessment. Multiple extremism researchers, law enforcement experts, and members of Congress have formally documented that DHS’s official social media recruitment campaign included imagery and slogans consistent with white nationalist messaging patterns. The Controller’s Office treats this as a relevant risk factor in the hiring calculus, not as a determinative legal finding.

A DHS post captioned “We’ll have our home again” directly referenced a phrase documented by the Global Project Against Hate and Extremism as circulating primarily in Proud Boys chapters and white nationalist networks. A Proud Boys chapter reposted the ad with the comment “If you know, you know” ([CBC News, Jan. 2026](#)). A separate post captioned “Which way, American man?” echoed the title of a recognized white nationalist text; the caption contained exactly 14 words, a number with documented symbolic significance in white supremacist ideology ([KPBS, Sept. 2025](#) [KQED, Sept. 2025](#)). Hannah Gais, a senior research analyst at the Southern Poverty Law Center, described the campaign as “oddly very familiar as someone who has been looking at the white nationalist and neo-Nazi movement for nearly a decade now,” calling it “disturbing to see coming from a government agency” ([CBC News, Jan. 2026](#)).

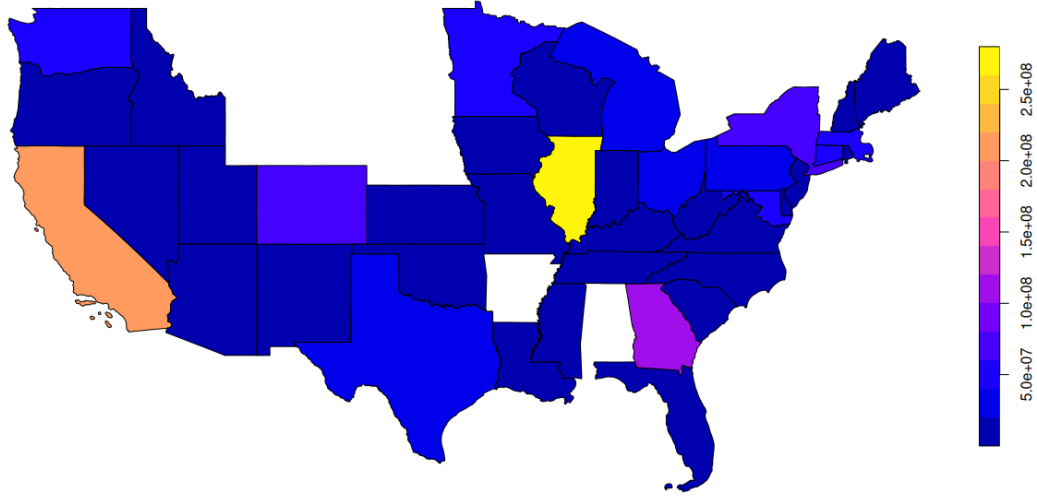
An internal DHS strategy document reported by *The Washington Post* described a “wartime recruitment” initiative budgeted at \$100 million, explicitly targeting UFC fans, gun-rights supporters, and military enthusiasts, with recruiters sourcing candidates at gun shows, martial arts centers, and rodeos ([Democracy Now!, Jan. 2026](#)). DHS spent \$5.8 million placing ICE recruitment ads on Meta and Google platforms ([Representatives Jayapal and Balint, Jan. 2026](#)). David Lapan, a former senior official at both the Pentagon and the Department of Homeland Security, concluded that ICE is “headed in the wrong direction” by attracting the wrong type of individual for a serious enforcement mission. This is the judgment of a former DHS insider, not a political critic.

The risk implications for Lehigh County are material. The documented recruitment strategy indicates a candidate pool shaped by ideological affinity signals rather than professional law enforcement qualifications. Van Maanen’s research established that police culture is transmitted not through formal instruction but through peer interaction, field experience, and the norms passed from senior to junior officers. When the recruitment pool is shaped by nationalist ideological signals, and training is too compressed to serve as a counterweight, the culture formed will reflect the values of that pool. A candidate who entered ICE after 2025 presents a risk profile shaped not only by the agency’s historical force data but by documented changes to training standards and recruitment targeting that the organizational socialization literature predicts will accelerate cultural entrenchment. The peer-reviewed literature reviewed above indicates that retraining is not a reliable correction for behavioral patterns formed under these conditions.

1. FINANCIAL RISK TO LEHIGH COUNTY

Police misconduct settlements represent a direct, measurable drain on public resources. Settlement compensation serves as a proxy for understanding the liabilities incurred by municipalities after hiring unqualified law enforcement officers. From 2009 to 2024, selected police misconduct cases averaged more than \$1 million each. According to an analysis of 366 selected cases, the mean value per case is \$3,878,315, while the median is \$900,000. Some victims have received remarkably high awards: a federal jury in Atlanta awarded \$100 million to Jerry Blasingame in August 2022. Other major recent cases include Nathen Jones in Chicago (\$45 million in 2024) and Randy Cox in New Haven (\$45 million in 2023). Aggregated data reveals that Illinois, California, and Georgia are the top three states for settlement payouts. Map 1 and Table 1 below rank the states by their total payout amounts.

Police Misconduct Settlements Amount by State 2009-2024 / Data Source: LDF's Thurgood Marshall Institute



Map 1. Police Misconduct Settlements by State, 2009 to 2024. Data Source: LDF's Thurgood Marshall Institute.

Rank	State	Amount (\$)
1	Illinois	270,755,000
2	California	200,530,000
3	Georgia	115,965,000
4	New York	76,324,000
5	Colorado	53,442,000
6	Maryland	53,184,000
7	Massachusetts	50,677,497
8	Minnesota	49,637,900
9	Connecticut	45,749,500
10	Washington	44,457,500
11	Michigan	32,200,000
12	Texas	30,198,300
13	Pennsylvania	25,800,000
14	Ohio	24,605,000
15	Kansas	19,025,000

Table 1. Total Police Misconduct Settlements by State, 2009 to 2024. Pennsylvania highlighted.

2. ICE USE-OF-FORCE CASES AND DETENTION DEATHS

This section documents two categories of incidents relevant to this analysis: fatal use-of-force cases involving ICE and CBP officers in the field, and deaths occurring in ICE detention custody. These cases are not presented as legal findings. They are illustrative of the institutional pattern analyzed in Section 5, and they establish the human and financial stakes that make the screening framework in this memorandum necessary.

Field Use-of-Force Cases

The following cases involve fatal shootings by ICE and CBP officers during enforcement operations. They are presented in reverse chronological order, with the most recent first.

Case 1. On January 24, 2026, Alex Jeffrey Pretti, a 37-year-old intensive care nurse at the Department of Veterans Affairs, was shot and killed by two U.S. Customs and Border Protection officers near Nicollet Avenue in Minneapolis, Minnesota, less than two miles from where Renee Good was killed seventeen days earlier. Pretti was filming federal agents and directing traffic when he was pepper-sprayed, tackled, and pinned face-down on the street by approximately six agents before being shot ten times in less than five seconds, according to forensic audio analysis conducted by ABC News. Video footage verified by Reuters, the BBC, the Wall Street Journal, and ABC News shows Pretti holding only a phone before agents confronted him. The CBP's own internal report to Congress, obtained by CBS News and NBC News, made no claim that Pretti had reached for or brandished his firearm, directly contradicting initial statements by DHS Secretary Kristi Noem that he arrived to "inflict maximum damage" and "massacre law enforcement." Minneapolis Police Chief Brian O'Hara noted that of the three homicides recorded in Minneapolis in 2026 at the time of Pretti's death, two had been carried out by federal immigration agents. The two CBP officers were subsequently identified by ProPublica as Border Patrol agent Jesus Ochoa and CBP officer Raymundo Gutierrez, both assigned to Operation Metro Surge.

Case 2. On January 7, 2026, Renee Nicole Good, a 37-year-old U.S. citizen and mother of three, was fatally shot by ICE agent Jonathan Ross in a residential neighborhood in Minneapolis, Minnesota. Good had just dropped off her six-year-old son at school and was stopped in her vehicle when officers approached. Video footage verified by ABC News, NBC News, and the New York Times shows Good's steering wheel turning away from the agent in the moment before he fired three shots. Minneapolis Police Chief Brian O'Hara described the killing as "predictable and preventable." The Minneapolis mayor stated publicly that video footage did not support the federal government's account that Good had tried to run over the agent. Her killing was the ninth time ICE agents had opened fire on people since September 2025.

Case 3. On May 8, 2018, 23-year-old Giovanni Leon was shot and killed by an ICE special agent during a narcotics investigation in Mesa, Arizona, after allegedly approaching an undercover agent and brandishing a handgun.

Case 4. On May 1, 2018, in San Antonio, Texas, Enforcement and Removal Operations agents fatally shot a suspect who fled during a warrant service and allegedly opened fire on agents during a pursuit.

Case 5. On March 2, 2018, 48-year-old Erik Christopher Dunham was killed by ICE agents in a Scottsdale, Arizona, parking lot after allegedly pulling a handgun when approached by agents serving a human trafficking warrant.

Deaths in ICE Detention Custody

Beyond field use-of-force incidents, the pattern of deaths occurring in ICE detention custody is directly relevant to the risk profile this memorandum addresses. 2025 was the deadliest year for people in ICE detention since 2004, with at least 31 confirmed deaths according to reporting by CBS News, NPR, and the American Immigration Council. As of March 2026, at least 13 additional deaths had occurred in ICE custody since the start of the year. The following cases are illustrative, presented in reverse chronological order.

Detention Case 1. Mohammad Nazeer Paktiawal, a 41-year-old Afghan national evacuated from Afghanistan following his service alongside U.S. military forces, died in a Texas hospital on March 14, 2026, less than 24 hours after ICE arrested him. His family reported that when they alerted the arresting agent he was unwell, the agent responded “don’t worry about it, we have a nurse” and ended the call. Paktiawal had no known pre-existing conditions according to his family and ICE.

Detention Case 2. Geraldo Lunas Campos, 55, died at a detention facility in Texas after a physical altercation with security staff who held him down. His death was classified as a homicide. Witnesses reported he was heard saying “I can’t breathe” during the struggle. Both witnesses were subsequently served with deportation notices.

Detention Case 3. Brayan Rayo-Garzon, 27, died in April 2025 by apparent suicide at an ICE detention facility. His mental health clinic appointment had been rescheduled twice during the two weeks he was held. He died before it took place.

Detention Case 4. Isidro Perez, 75, died on June 26, 2025, three weeks after being detained in Key Largo, Florida. He had documented heart disease and his former partner reported he was experiencing chest pains and not receiving his medication while in custody.

The detention death rate per 10,000 detainees in 2025 was the highest since 2020 according to CBS News analysis, even after controlling for the record increase in the detention population, which reached approximately 70,000 people by early 2026. The DHS Office of Civil Rights and Civil Liberties, which conducted oversight investigations following detainee deaths, saw significant staff reductions in 2025. The Office of Detention Oversight ceased operations during the government shutdown, according to NPR.

3. METHODOLOGY

The Controller’s Office developed a two-metric framework to objectively assess the risk profile of candidates with prior law enforcement experience. The methodology is designed to be consistent, replicable, and legally defensible when applied uniformly. The assessment is guided by two primary indicators:

- **Basic Training Hours.** The number of core basic training hours completed by a candidate’s academy, categorized by the BASIC_REQ variable quartile range.
- **Agency Fatal Force Record.** The percentage of an organization’s fatal force incidents considered unjustified or sustained as misconduct, relative to total reported deaths in the dataset.

The goal is to provide hiring managers with benchmark data to determine how a candidate’s previous training and agency experience rank against national counterparts. This memorandum relies on factual data from three sources: the [Census of Law Enforcement Training Academies](#) (2022), the [Police Scorecard Project](#) (2022), and [Settlements from the National Police Database](#).

Metric 1: Basic Training Hours

Training hours data are drawn from the [2022 Census of Law Enforcement Training Academies \(CLETA\)](#), published by the U.S. Bureau of Justice Statistics. The BASIC_REQ variable captures mandated core training hours as of December 31, 2022. Of 857 records, 610 included complete observations and were used in this analysis.

Scope note: This metric measures hours of mandated basic training as reported to BJS. It does not measure training quality, field experience, or post-academy development. It is used here as an objective, nationally comparable baseline for screening purposes only.

Metric 2: Agency Fatal Force Record

Fatal force data are drawn from the [Police Scorecard Project \(2013 to 2022\)](#), which provides records of more than 8,500 law enforcement fatalities including official disposition classifications.

Because a large share of cases lacked official disposition rulings, the Controller's Office developed a five-step algorithmic classification to categorize pending cases as either Appearance of Justified or Appearance of Unjustified:

1. **Narrative Construction.** Each fatality record was enriched by combining fields including reason for encounter, armed/unarmed status, alleged threat level, weapon details, and mental health indicators into a single narrative.
2. **Topic Modeling.** A Latent Dirichlet Allocation (LDA) model identified thematic structures within the constructed narratives.
3. **Human Analysis.** An analyst reviewed thematic output and assigned each topic cluster a classification based on the circumstances described.
4. **Case Classification.** Individual cases were assigned to Appearance of Justified or Appearance of Unjustified based on topic assignment.
5. **Agency Scoring.** Each agency's share of Appearance of Unjustified cases was calculated as a percentage of total classified incidents.

Scope note: This classification system is a pattern-detection and risk-screening tool. It is not a legal determination of justified or unjustified use of force, and individual case assignments reflect probabilistic thematic grouping, not adjudicated findings. It is used here to produce a comparable agency-level risk indicator for hiring screening purposes.



Chart 1. Number of Records in Police Score Card Data, 2013 to 2022.

4. RESULTS

Average Required Basic Training Hours

The mean value for required basic training is 804.6 hours. At a 90% confidence level, the interval ranges from 789.6 to 819.5. The minimum recorded is 71 hours; the maximum is 1,664. The median is 770 hours. Tables 2 and 3 summarize these results.

Statistic	Value (Hours)
National Mean	804.6
90% Confidence Interval, lower	789.6
90% Confidence Interval, upper	819.5
Minimum	71
Median (50th percentile)	770
Maximum	1,664

Table 2. National Basic Training Hours Summary Statistics, CLETA 2022.

Agency Type	Avg	Min	Q1	Median	Q3	Max	NAs
State POST or equivalent	665.4	200	561	640	782	1,064	23
State police / highway patrol	966.6	408	800	1,021	1,160	1,464	18
Sheriff's office	730.3	120	544	720	920	1,184	33
County police dept.	1,015.3	408	892	1,036	1,185	1,500	11
Municipal police dept.	932.0	160	740	920	1,095	1,664	57
4-year university	761.6	366	634	760	839	1,250	34

Agency Type	Avg	Min	Q1	Median	Q3	Max	NAs
2-year college	758.9	320	680	745	801	1,536	74
Technical school	689.7	71	710	737	768	800	23
Special jurisdiction	984.2	80	900	1,024	1,250	1,397	15
Multi-agency	761.2	238	674	775	870	1,132	22
All academies	804.6	71	680	770	934	1,664	247

Table 3. Basic Training Hours by Agency Type, CLETA 2022.

Agency Percentage of Appearance of Unjustified Deaths

The LDA topic model was executed to produce the pattern groupings in Table 4. These groupings represent probabilistic thematic clusters, not legal verdicts. The terms Justified and Unjustified in this context reflect the analyst’s assessment of the apparent circumstances described in each narrative cluster, and are used solely as screening indicators.

Topic	Description	Prevalence	Coherence	Assessment
t_1	attacked_lethal_gun_noninfluence	6.39	0.31	Justified
t_2	noattacked_otherarm_noninfluence	3.47	0.42	Unjustified
t_3	noattacked_knife_noninfluence	5.70	0.79	Unjustified
t_4	armed_noattacked_knife	3.77	0.64	Unjustified
t_5	attacked_otherarm_underinfluence	2.87	0.57	Unjustified
t_6	erratic_behavior_armed	2.12	0.40	Unjustified
t_7	unarmed_noattacked	10.21	0.73	Unjustified
t_8	attacked_lethal_gun_noninfluence	10.47	0.41	Justified
t_9	armed_attacked_knife_underinfluence	2.05	0.60	Unjustified
t_10	gun_armed_noattacked	1.46	0.43	Unjustified
t_11	hostage_situation_armed	1.37	0.38	Justified
t_12	attacked_lethal_gun_underinfluence	5.82	0.69	Justified
t_13	attacked_otherarm_noninfluence	6.82	0.30	Justified
t_14	attacked_lethal_gun_noninfluence	7.68	0.50	Justified
t_15	noattacked_lethal_gun	2.84	0.45	Justified
t_16	gun_noninfluence_warrantbacked	3.28	0.68	Justified
t_17	noattacked_lethal_gun_noninfluence	11.30	0.58	Unjustified
t_18	armed_attacked_knife_noninfluence	3.34	0.86	Unjustified
t_19	noattacked_lethal_gun_underinfluence	3.68	0.40	Unjustified
t_20	lethal_vehicle_noninfluence	5.38	0.58	Justified

Table 4. LDA Topic Model Results: Fatal Force Classification, Police Scorecard Project (2013 to 2022).

5. FINDINGS: AGENCY COMPARISON

The table below presents the classification results for three agencies relevant to Lehigh County hiring: U.S. Immigration and Customs Enforcement, the Pennsylvania State Police, and the Allentown Police Department. Data cover fatal force incidents from the Police Scorecard Project (2013 to 2022).

Results are interpreted using the following confidence threshold rule, applied consistently across all agencies: fewer than 10 classified incidents is treated as inconclusive; 10 to 24 incidents is treated as cautionary and subject to additional review; 25 or more incidents supports comparison. ICE (8 total incidents) falls in the inconclusive range on sample size alone and should be weighted accordingly. Pennsylvania State Police (63 incidents) and Allentown (3 incidents) are noted for reference. Because ICE also fails the training hours threshold independently, the combined hard-disqualifier standard applies even where the fatal force data is treated as cautionary rather than definitive.

Agency	Classification	Cases	Total	Share
Pennsylvania State Police	Appearance of Justified	34	63	54%
Pennsylvania State Police	Appearance of Unjustified	29	63	46%
Allentown Police Dept.	Appearance of Justified	2	3	67%
Allentown Police Dept.	Appearance of Unjustified	1	3	33%
U.S. Immigration & Customs Enforcement	Appearance of Justified	3	8	38%
U.S. Immigration & Customs Enforcement	Appearance of Unjustified	5	8	63%

Table 5. Fatal Force Classification by Agency, Police Scorecard Project (2013 to 2022).

ICE has the highest unjustified rate at 63%, compared to 46% for Pennsylvania State Police and 33% for the Allentown Police Department. Based on this dataset, a former ICE agent presents a higher indicated risk profile on this metric than candidates from either of those agencies. A candidate from the Allentown Police Department meets Standard 2. A candidate from the Pennsylvania State Police (46% unjustified, training hours to be verified separately) would be flagged for review but not hard-disqualified on that metric alone.

6. POLICY RECOMMENDATIONS

From Agency Data to Individual Screening

The metrics in this framework are agency-level risk indicators, not predictions about individual candidates. Individual officers within any agency vary in their training, conduct, and professional judgment, and these standards do not imply otherwise. The policy rationale for using agency-level data in screening is not that all candidates from a flagged agency will perform poorly. It is that the County has a fiscal and legal obligation to apply consistent, objective criteria that identify elevated risk factors warranting closer review. A candidate from a flagged agency retains the ability to address the flag through documented supplemental training,

structured reference checks, and direct review. These standards establish a floor for initial screening; they do not substitute for the full hiring process.

The standards below are tiered. Some operate as hard disqualifiers based on clear data thresholds; others function as flags that require additional review before a hiring decision is made. All thresholds should be reviewed and formally adopted by legal counsel prior to implementation.

Standard 1: Basic Training Hours

Training hours are used because they are objective, nationally comparable, and publicly verifiable, not because they fully capture training effectiveness or officer quality. Hours represent a baseline input threshold, not a measure of what was learned or how it was applied. The national mean across 610 academies is 804.6 hours (90% CI: 789.6 to 819.5). HR managers should apply the following tiered screening:

Tier	Threshold	HR Action
Hard Disqualifier	Academy hours below 680 (below 25th percentile nationally)	Do not advance. Training is materially below national standards and presents elevated liability risk.
Flag for Review	Academy hours 680 to 789 (below 90% CI lower bound)	Advance with documented review. Request details on supplemental training or field experience.
Meets Standard	Academy hours 790 or above	No further action required on this metric.

Table 6. Standard 1 Screening Tiers: Basic Training Hours.

To apply this standard, obtain the name of the candidate’s training academy and cross-reference against the Bureau of Justice Statistics CLETA dataset (2022), locating the BASIC_REQ value for that program. If the academy does not appear in the dataset, treat the candidate as flagged and request documentation of completed hours directly.

Standard 2: Prior Agency Fatal Force Record

A candidate’s prior agency record provides context on the institutional culture in which they were trained and supervised. This metric is more sensitive to sample size and should not be used as a standalone hard disqualifier except in extreme cases. Apply the following tiered screening:

Tier	Threshold	HR Action
Hard Disqualifier	60%+ unjustified AND training hours also deficient	Do not advance. Dual failure indicates systemic risk, not an isolated data point.
Flag for Review	40 to 59% unjustified, or 60%+ with adequate training hours	Advance with documented review. Conduct structured use-of-force interview questions; request supervisor references.
Meets Standard	Below 40% unjustified	No further action required on this metric.

Table 7. Standard 2 Screening Tiers: Prior Agency Fatal Force Record.

To apply this standard, obtain the candidate’s prior employing agency, cross-reference against the Police Scorecard Project dataset, and locate the agency’s share of cases classified as Appearance of Unjustified. Agencies with fewer than 10 total classified incidents should be treated as inconclusive; base the decision on training hours alone.

Applied Example: ICE

The following applies the two standards developed above to a candidate with prior employment at ICE. This is one illustrative case; the same framework applies to any candidate with prior law enforcement experience, regardless of agency. ICE is presented here because it is the agency with the most direct relevance to recent Lehigh County hiring inquiries and because it produces a clean dual-threshold result that illustrates how the combined hard-disqualifier is triggered.

Metric	ICE Value	National Benchmark	Result
Basic Training Hours	672 hours ¹	804.6 hours (mean)	Fails. Below 680-hour threshold.
Agency % Unjustified Deaths	63% unjustified	<40% preferred; 60% hard limit	Fails. Exceeds 60% threshold.

Combined Determination: Do not advance. Both metrics fail. Hard disqualifier applies. Requires written authorization from county leadership and legal counsel to override.

Table 8. ICE Candidate Screening Outcome Under Proposed Standards.

¹ DHS states that ICE recruits receive 56 days of training at 12 hours per day, totaling 672 basic training hours. See [DHS statement, February 2026](#).

Applied against these standards, a former ICE agent falls below both thresholds: training hours are approximately 132 hours below the national mean and fall below the hard disqualifier threshold, and 63% of classified fatal force incidents are categorized as Appearance of Unjustified. Because both metrics fail simultaneously, the combined hard disqualifier applies. HR managers should not advance such a candidate without explicit written authorization from county leadership and legal counsel.

Implementation Requirements

Before these standards are formally adopted, the following steps are required:

- **Legal Review.** County solicitor or outside counsel must confirm that both metrics, applied consistently across all agencies, do not constitute discriminatory screening under applicable employment law.
- **Threshold Ratification.** County leadership must formally ratify the specific thresholds (or substitute alternatives) before HR managers apply them to live candidates. Thresholds in this memo are data-informed recommendations, not final policy.
- **Consistent Application.** Standards must be applied to every candidate with prior law enforcement experience, regardless of agency. Selective application would undermine legal defensibility.
- **Annual Dataset Review.** The CLETA and Police Scorecard datasets should be re-evaluated annually and thresholds adjusted if national averages shift materially.
- **Documentation.** Every hiring decision affected by these standards must be documented in writing, including which tier applied and what action was taken. This record is essential if a decision is later challenged.

QUICK REFERENCE: HR MANAGER CHECKLIST

When a candidate has prior law enforcement experience, take the following steps:

Action	Guidance
Step 1: Training Hours	Look up the candidate's academy in the CLETA 2022 dataset. If hours are below 680: do not advance. If 680 to 789: flag and document.
Step 2: Agency Record	Look up the candidate's prior agency in the Police Scorecard dataset. If 60%+ unjustified AND training hours are deficient: do not advance. If 40 to 59%: flag and document.
Step 3: Flagged Candidates	Conduct structured reference checks, including at least one supervisor who can speak directly to the candidate's use-of-force conduct. Document the outcome.
Step 4: Documentation	Retain written documentation of all decisions affected by these standards in the candidate's permanent file.

Table 9. HR Manager Hiring Checklist for Candidates with Prior Law Enforcement Experience.

These standards provide a data-grounded, defensible foundation for hiring decisions. They represent a floor, not a ceiling. Hiring managers retain full discretion to apply additional criteria as warranted by individual circumstances.