

Early Identification Systems

May 2020

The IACP Law Enforcement Policy Center creates four types of documents: Model Policies, Considerations Documents, Concepts & Issues Papers, and Need to Know one-page summaries. Typically, for each topic, either a Model Policy or a Considerations Document is created, supplemented with a Concepts & Issues Paper. This file contains the following documents:

- *Considerations Document*: Offered as an alternative to the bright-line directives found in a Model Policy. Instead of providing exact policy language, the Considerations Document outlines items that agencies should address and provides options that agencies should examine when developing their own policies on the topic.
- *Concepts & Issues Paper*: Designed to provide context and background information to support a Model Policy or Considerations Document for a deeper understanding of the topic.

Considerations Document

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Early Identification Systems

I. PURPOSE

Law enforcement agencies should develop a system to assist supervisors and managers in identifying employees whose performance warrants review and, where appropriate, outlining intervention procedures in circumstances where the employee's behavior may have negative consequences for the employee, coworkers, the agency, and/or the general public. These Early Identification Systems (EIS) may serve to improve employee health, promote community-police relations, encourage positive behavior, and reduce public complaints. The goal of the EIS is to assist the employee in reaching their full potential by using data to identify performance trends worthy of review. An EIS is intended to be a tool to enhance supervision and should not be construed as taking the place of effective supervision of employees.

While there is general agreement that there is a need for a mechanism to identify employees whose performance warrants review, research has been mixed as to the effectiveness of early intervention systems to predict behavioral issues or prevent employee misconduct. This document is intended to provide agencies with items for consideration when developing policies related to an EIS.

II. POLICY

Agencies should develop a policy statement that briefly and concisely explains to agency personnel and the public the agency's policy on identifying and responding to employee performance concerns.

Sample: It is the policy of this agency to establish a system for tracking and reviewing performance indicators and/or incidents of risk to this agency and the involved employees. To this end, the Early Identification System (EIS) shall be used as a means to identify and assess employee performance, to include potential-risk incidents, and intervene where appropriate. Nothing in this policy precludes supervisors from taking intervention steps or suggesting an individual course of employee assistance based on their observations and interactions with an employee.

III. PROCEDURES

- A. Prior to implementing an EIS, agencies should consider the potential implications. These may include:
 1. A time commitment required to effectively administer the program;

2. Recurring training, especially for new supervisors who are tasked with counseling employees and the need for thorough, accurate documentation;
 3. Regular evaluation of the program to ensure that it is being effectively applied throughout the agency;
 4. Financial costs of developing and maintaining the system.
- B. When establishing an EIS, agencies should consider what items or information should be tracked to identify performance trends requiring supervisory review for effective management and possible intervention. These may include but are not limited to:
- Complaints – both from the public and other employees,
 - Body-worn camera or dash camera footage,
 - Disciplinary actions,
 - Documented performance counseling/redirection sessions,
 - Intimate partner assault,
 - Domestic incidents,
 - Personal issues affecting work-related performance (e.g., divorce, death of a family member),
 - Motor vehicle collisions,
 - Pursuits – both vehicular and foot,
 - Lawsuits and claims,
 - Assaults on the officer,
 - Reports of individuals resisting arrest or the employee filing resisting arrest charges,
 - Use of force reports,
 - Leave usage,
 - Criminal arrests made,
 - Traffic stops conducted,
 - Investigative stops initiated,
 - Injury on duty,
 - Loss or damage of agency equipment, to include motor vehicles,
 - Firearm discharge,
 - Commendations and awards,
 - Response to critical and/or traumatic incidents,
 - Agency rule violations,
 - Training activity,
 - Evidence and/or property seizures,
 - Criminal investigations of employees,
 - Secondary employment,
 - Worker’s compensation claims,
 - Misuse of electronic control weapons,
 - Other examples of conduct as defined by agency policy.
- C. In addition, EIS policy and procedures should address the following concerns:
1. Determining who is responsible for compiling and/or collating the data. When making this decision, the increase in workload and potential significant time commitment should be factors.
 2. Defining the role of the supervisor in the process.
 3. Deciding whether officers will be granted access to the information.
 4. Establishing how privacy, access, and control of data will be managed.

- D. Agencies should consider how information collected and tracked will be used. The goal of this is to identify when intervention is necessary. This may include these components:
1. Use of historical averages to identify meaningful deviations.
 2. Establishment of thresholds using factors such as
 - Size of agency,
 - Peer/comparison groups,
 - Ratios,
 - Assignments (e.g., patrol vs. narcotics),
 - Locations (e.g., high-crime areas),
 - Community demographics,
 - Expectations,
 - Employee's previous performance.
- E. As part of the EIS, reports should be generated to assist supervisors or other designated personnel in identifying employees who may require intervention.
1. The goal of the report should be to initiate a review of the employee's performance.
 2. The report should be only for informational purposes and should not contain any conclusions or opinions.
 3. The report should include a brief summary of the items tracked, to include any contextual information, as available. This may include a summary of other officer, personnel, and performance data that may assist in determining if there is a pattern of behavior that should be addressed.
 4. Agencies should consider how often reports need to be generated.
- F. Once a report is generated, agency policy should provide guidance on next steps. This may include the following:
1. The supervisor reviews the report and determines if any action is necessary. This review should include a consideration of the totality of the circumstances to identify if a pattern of behavior warrants intervention.
 2. The supervisor and the employee meet to discuss the report.
 3. The supervisor and the commander meet to discuss if corrective action is necessary.
 4. Any decisions made by the supervisor and commander, and the reasoning behind them, are noted in the report. This may include the development of an employee performance improvement plan.
 5. The decision regarding appropriate action is sent through the chain of command through the designated unit, such as the Office of Professional Responsibility or Human Resources, to the chief executive or their designee for approval.
 6. Once approved, any corrective action is taken and the employee's participation in the performance improvement plan is monitored, where applicable.
- G. When implementing an EIS, agencies should also consider what types of responses will be available to address potential performance concerns. These may include but are not limited to the following responses:
- Supervisory counseling,
 - Referral to a peer support program or EAP,
 - Referral to a qualified mental health professional,
 - Corrective action,
 - Supervisory evaluation period,
 - Fitness-for-duty evaluation,
 - Additional training,
 - Reassignment or transfer,

- Dismissal,
 - No action.
- H. Agencies should conduct an audit of the EIS on a regular basis, such as annually, to ensure that it is meeting agency needs and goals.

Every effort has been made by the IACP Law Enforcement Policy Center staff and advisory board to ensure that this model policy incorporates the most current information and contemporary professional judgment on this issue. However, law enforcement administrators should be cautioned that no model policy can meet all the needs of any given law enforcement agency. In addition, the formulation of specific agency policies must take into account local political and community perspectives and customs, prerogatives, and demands; often divergent law enforcement strategies and philosophies; and the impact of varied agency resource capabilities, among other factors. Readers outside of the United States should note that, while this document promotes procedures reflective of a democratic society, its legal basis follows United States Supreme Court rulings and other federal laws and statutes. Law enforcement administrators should be cautioned that each law enforcement agency operates in a unique environment of court rulings, state laws, local ordinances, regulations, judicial and administrative decisions, and collective bargaining agreements that must be considered and should therefore consult their legal advisor before implementing any policy.

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Concepts & Issues Paper

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Early Identification Systems

I. INTRODUCTION

A. Purpose of the Document

This paper is designed to accompany the *Considerations Document on Early Intervention Systems* published by the IACP Law Enforcement Policy Center. This paper provides essential background material and supporting documentation to provide greater understanding of the developmental philosophy and implementation requirements for the Considerations Document. This material will be of value to law enforcement executives in their efforts to develop their own policies that meet the requirements and circumstances of their communities and their law enforcement agencies.

This document includes an examination of the development, goals, and implementation of an early identification system (EIS). This information will (1) describe and analyze the various procedural guidelines involved in creating an EIS; (2) provide information for employees, supervisors, and managers regarding the use of an EIS; (3) examine various EIS options, including software programs that are available for agency use; and (4) address concerns associated with employing an EIS. The EIS prompts supervisors to review and address performance trends on an ongoing basis, and supervisors may include any EIS interventions and relevant information in annual performance evaluations.

Individual agencies often have widely varying procedures and styles in this area based on law, employment contracts, or applicable civil service requirements and agreements. Additionally, while there is general agreement that there is a need for a mechanism to identify employees whose performance warrants review, there is no current evidence to confirm that any single, specific process will identify potential behavioral issues and/or prevent employee misconduct. This document is intended to provide context for considerations to be made for a well-administered, professional EIS.

B. Terminology

For the purposes of this document, the term “early warning system” has been replaced with “early identification system” (EIS) to better represent the goal of these programs, that is, to assist supervisors and managers in identifying officers and other agency employees whose performance necessitates review and, where appropriate, intervention in

circumstances that may have potential negative consequences for the employee, fellow employees, the agency, and/or the general public.

C. Overview

The need for EIS within law enforcement agencies is of paramount importance in today's society as it is common for the actions of agency employees to be under scrutiny. An EIS is a data-based law enforcement management tool that is designed to identify employees who display specified behaviors. A comprehensive EIS is an essential component to a well-managed law enforcement agency. Early identification of struggling employees can increase agency accountability and offer employees a better opportunity to maintain a high standard of performance, receive timely assistance and support, and conform with the agency's values and mission statement. However, it should be noted that the availability of an EIS does not alter the critical role of line supervisors to directly monitor the performance and behavior of personnel under their charge.

An EIS operates on the theory that education, training, health and wellness programs, and other forms of support can help employees improve their performance. Making employees aware of behaviors that are concerning to supervisors not only allows them to adjust their own practices, but it also demonstrates that agency leadership is attuned to the work being done, which can be positive for morale. The key factor that should be considered when developing and implementing an EIS is ensuring that any response to identified behaviors is viewed as supportive, rather than punishing.

An EIS also serves as a risk management tool to identify and prevent predictable losses to an organization. Risk management is the systematic proactive approach to the reduction of adverse consequences before they occur. This is accomplished through the continuous identification, analysis, and evaluation of risk exposure and determining and developing the best methods of preventing or limiting loss.¹ An EIS also has the ability to improve employee health, promote community-police relations, encourage positive behavior, and reduce public complaints.

D. Components of an EIS

While each law enforcement agency is encouraged to develop an EIS that is suited to its individual needs, there are basic components that should be considered. For instance, agencies should examine the following when establishing their EIS:

- Definitions of employee behaviors or actions that are included for review,
- Threshold or trigger levels to initiate a review of employee actions or behavior,
- Review of identified employees that is based on current patterns of collected material and approved by the agency chief executive or their designee,
- Agency reporting requirements of conduct and behavior,
- Documented annual evaluation of the system,
- The responsibilities of supervisors,
- Remedial action,
- Availability of assistance such as an established employee assistance program or peer counseling.

¹ Los Angeles Police Department, Legal Affairs Section, Risk Management Unit, *Report on Risk Management*, June 1998.

E. EIS Concerns

Potential drawbacks associated with an EIS include the concerns that the system may:

- Have an adverse impact on an officer's career,
- Inhibit active and desirable police work,
- Lack buy-in from both employees and supervisors, resulting in ineffective use of the system,
- Create a legal liability for the agency if it fails to use the system, and
- Capture data that could be used in court against the agency.

Some agencies may implement an EIS but make little effort to enforce the requirements that are needed to allow the system to operate efficiently and effectively. Employing and maintaining an EIS requires a significant time commitment, which some agencies may be unable to fully grasp when first committing to developing a system. The simple implementation of an EIS through the establishment of a policy and suggested procedures is insufficient. Instead, there must be regular evaluation to ensure that employees, especially supervisors, are actively engaging in the system and following the appropriate procedures related to the collection of data and response to reports of problematic behavior.

Agencies must also strive to maintain the trust of their employees. An effective EIS should be viewed as a tool to benefit employees, rather than one focused on punishment. Agencies should work to educate their employees on the purpose and intent of the EIS and highlight the positive nature of the system.

Agencies should also be aware of potential legal issues that result from the use of an EIS. Agencies may be reluctant to create an EIS for fear that it will create a database of employee misconduct that plaintiff attorneys may use against the agency. However, an EIS is more likely to protect an agency against liability. The existence of an EIS is evidence that an agency is making an effort to identify employees whose performance is deemed unsatisfactory and has established a program in a conscientious effort to correct that behavior.

II. POLICY RECOMMENDATIONS

A. Implementing an EIS

Before establishing an EIS, an agency must recognize the significant time commitment such a system requires. Additionally, there are costs associated with implementing and maintaining an EIS that should be considered prior to implementation. In order for the EIS to be effective, data must be regularly documented, compiled, and entered into the system, if applicable. Supervisors must also regularly review the EIS to determine if action needs to be taken for any of their staff.

Training. It is also important to acknowledge that proper, recurring training on the EIS will be required for existing and new supervisors. Supervisors should also receive additional training related to recognizing experiences that may affect officer performance, potentially problematic behavior, pattern analysis, and the importance of evaluating the totality of the circumstances.

Management of the System. In many jurisdictions, EIS is managed by the agency's office of professional standards (OPS).² OPS may also have responsibility for risk management and overall compliance with professional standards. For smaller agencies, this function may be administered by an individual officer, another agency employee, or the jurisdiction's human resource authority.

Agency policy should specifically identify who is responsible for compiling and/or collating the necessary data. When making this determination, the agency should consider the potential increase in workload and significant time commitment involved. Agencies should also establish the role of the supervisor or other designated personnel in the

² For the purposes of this document, the term Office of Professional Standards (OPS) will be used to describe any entity whose primary responsibility is to conduct investigations of employee misconduct allegations, such as an internal affairs unit.

process; whether individual officers will have access to the information and if so, to what extent; and how privacy, access, and control will be managed. Furthermore, an EIS will need to be regularly evaluated to ensure that it is being effectively applied throughout the agency.

Information Collection and Analysis. When implementing an EIS, agencies should address what information will be collected, the method to be used to collect information, and how this information will be used. The overall goal of an EIS is to determine when an intervention for an employee is necessary, or for positive behaviors, when an employee becomes eligible for a promotion, award, or some other commendation of service.

It is important to determine specific selection criteria to be tracked by the EIS. Although there are currently no standards for identifying employees for early identification programs, the following performance indicators should be considered:³

- Complaints – both from public and other employees,
- Body-worn camera or dash camera footage,
- Disciplinary actions,
- Documented performance counseling/redirection sessions,
- Intimate partner assault,
- Domestic incidents,
- Personal issues affecting work-related performance (e.g., divorce, death of a family member),
- Motor vehicle crashes or collisions,
- Pursuits – both vehicular and foot,
- Lawsuits and claims, particularly those pertaining to
 - domestic violence,
 - untruthfulness,
 - racial bias,
 - physical force,
- Assaults on the officer,
- Reports of individuals resisting arrest or the employee filing resisting arrest charges,
- Use of force reports, which may include tracking by physical characteristics of suspect and results,⁴
- Leave usage – Agencies may consider tracking both under and over-utilization and including excused leave, absence without leave, and suspensions,
- Criminal arrests made,
- Traffic stops conducted,
- Investigative stops initiated,
- Injuries on duty,
- Loss or damage of agency equipment, to include motor vehicles,
- Firearm discharge,
- Commendations and awards,
- Response to traumatic incidents,
- Agency rule violations,

³ Robert E. Worden, Sarah J. McLean, Eugene A. Paoline, III, and Julie Krupa, “Features of Contemporary Early Intervention Systems” (presentation, 122nd Annual IACP Conference and Exposition Chicago, Illinois, October 2015).

⁴ For more information, see the IACP Policy Center documents on Reporting Use of Force available at <https://www.theiacp.org/resources/policy-center-resource/reporting-use-of-force>.

- Misuse of electronic control weapons,
- Training activity – Failure to complete training may indicate concerns regarding time management, lack of preparation, inability to handle internal work requirements, and/or work-life balance concerns,
- Evidence and/or property seizures, including the frequency and value of seizures and whether a warrant was utilized,
- Criminal investigations of employees, including missed court appearances,
- Secondary employment,
- Worker’s compensation claims,
- Other examples of conduct as defined by agency policy.

To ensure transparency in the process and encourage buy-in by all employees, agencies must clearly establish how the information that is collected and tracked will be used. Examples of potential uses include determining historical averages, which can then be used to identify meaningful deviations, and establishing thresholds. When identifying the thresholds that will trigger the EIS, agencies should consider the following factors:

- Size of agency,
- Peer/comparison groups,
- Ratios,
- Assignments (e.g., patrol vs. narcotics),
- Locations (e.g., high-crime areas),
- Community demographics,
- Expectations,
- Employee’s previous performance.

B. EIS Procedures

Reports. In most EIS, the first step in the process involves the creation of a performance report to assist supervisors in identifying those employees who may require intervention. The goal of the report should be to initiate a review of an employee’s performance and assist supervisory personnel to evaluate and guide their subordinates. The report should be used for informational purposes only and should not contain any conclusions or opinions. It should include a brief summary of the items that have been tracked, with context, if applicable, and provide respective dispositions, where available.

Agencies should determine who is responsible for generating the reports. For example, if OPS oversees the EIS, it may create the reports. Alternately, agencies may elect to provide supervisors with access to the system, so they can generate them directly. Agencies should also consider how often reports should be generated. A monthly or quarterly review may be appropriate to remain involved in employee performance.

Agencies may elect to have a report forwarded to the appropriate supervisor whenever an incident is under review by OPS, to include the employee’s assignment when the incident occurred. Reports should also be generated following any motor vehicle crashes or collisions; pursuits, both vehicular and foot; lawsuits and claims; assaults on the officer; officer reports of resisting arrest and obstruction; excessive uses of leave; and criminal arrests made.

It is important to include context in the report, such as reference to any historical norms, such as vehicular pursuits or uses of force, of all agency personnel functioning in the same or similar assignments. It is the responsibility of the agency to regularly update the specific norms for each behavioral or performance indicator. Any reports on individual employees based on deviations from those norms should be distributed to the appropriate supervisor.

While reports should be generated on a regular basis, ad hoc reports may be necessary to address an employee who violates policy or requires immediate intervention. This includes any time an employee exceeds the threshold

established for a particular performance indicator. For example, an agency may establish a threshold of five public complaints over a two-year period or three or more discharges of firearms per officer within five years.⁵

Report Review. Supervisors should review the EIS reports to determine if any action should be taken. This review should include a consideration of the totality of the circumstances to identify if an experience or a pattern of behavior warrants intervention. For example, if an officer responds to a traumatic incident, the EIS might alert the supervisor to ensure that appropriate mental health support services are provided.⁶ Supervisors should also consider relevant information external to the report to inform the intervention decision. For example, if an officer exceeds a threshold for use of force, it would be critical to assess whether the officer is demonstrating possibly problematic behaviors in other areas, including but not limited to public complaints, sick time usage, or substandard workplace behavior, when determining the appropriate intervention. When considering the full context of the behavior subject of the threshold report, the supervisor may identify a broader pattern of problematic behavior that requires more holistic intervention than the isolated threshold may have suggested. Supervisors should then meet with the employee to review their performance and encourage them to provide insight into the itemized incident and problems identified in the report. In addition, the supervisor should meet with a commander or other superior to determine if additional support or corrective action is necessary. Any decision regarding appropriate action, to include the development of an employee performance improvement plan, should be added to the report. Whether interventions are applied or not, the employee should be monitored closely for a designated period of time.

After evaluating the report provided by the OPS, the supervisor may recommend a number of possible interventions that could include but are not limited to these interventions:

- Supervisory counseling,
- Referral to a peer support program or EAP,
- Referral to a qualified mental health professional,
- Corrective action,
- Supervisory evaluation period,
- Fitness-for-duty evaluation,
- Additional training,
- Reassignment or transfer,
- Dismissal,
- No action.

The decision regarding appropriate action should then be sent through the chain of command through OPS to the chief executive or their designee for approval. Once approved, the corrective action should be taken, and the employee's performance should be monitored closely.

EIS programs operate under the assumption that intervention, where needed, is relevant to the target behavior and has a positive impact on the employee in question with no unintended negative effects. In order for the intervention process of an EIS to be effective, the agency should establish a set of guidelines to ensure the consistent delivery of assistance and corrective action.

There are several variations on how employee performance can be monitored. Some systems use formal reviews, evaluations, and reporting of employees' performance by immediate supervisors for a period of several months. Other systems rely merely on informal commitment to reviewing employees' performance following intervention. Where appropriate, indications of employee compliance or noncompliance should be documented and kept for future references and/or evaluations.

⁵ Samuel Walker, Geoffrey P. Alpert, and Dennis J. Kennedy, *Responding to the Problem Police Officer: A National Study of Early Warning Systems, Final Report* (U.S. Department of Justice, 2000), <https://www.ncjrs.gov/pdffiles1/nij/grants/184510.pdf>.

⁶ For more information, see the Policy Center documents on Employee Mental Health available at <https://www.theiacp.org/resources/policy-center-resource/employee-mental-health/>.

C. Software Programs

Computer software programs exist that are designed specifically to keep the range of information required for an EIS. The complexity of these tracking programs depends on the needs of specific law enforcement agencies, but the overall design of such systems is relatively simple.

Depending on the specific needs of the agency, the software can either be developed from within the agency (generally by a systems administrator) or by an outside contractor. Regardless of the agency's resources, software programs should be dynamic and flexible enough to accommodate additional indicators and generate a variety of reports based on agency needs.

D. Additional Considerations

In concert with the aforementioned recommendations, there are additional items that agencies may want to consider when developing an EIS system.

Legal Considerations. When collecting data about individuals, privacy and security of the data is likely to be a concern. It is important to consult with legal advisors to understand jurisdictional laws and policies regarding releases of information, Right to Know laws, public record-keeping, and proper procedure when requests for EIS records are received.

Small agencies. While implementing an EIS may seem unnecessary for law enforcement agencies where members know each other well and interact every day, maintaining records of employee performance can be critical in circumstances when a long-standing official retires or leaves the agency. An EIS allows proper records to be preserved in such circumstances.

Union Concerns. It may be helpful to collaborate with union representatives when either developing or presenting an EIS to agency personnel. Union officials may have concerns about performance tracking, particularly as it relates to personal or domestic issues. It is important to be aware of potential opposition that unions may present to the development and implementation of an EIS.

Disputes about Effectiveness. While the research base for an EIS is limited, studies that evaluate existing EIS show mixed findings in terms of effectiveness. Some evaluations consider extremely specific components of an EIS, the findings from which are not easily applied to other agencies.⁷ There is also evidence to suggest that the success of an EIS depends on agency characteristics, in addition to the specific components of the EIS (i.e., indicator types, threshold levels, etc.).⁸ Other academics have been critical about EIS that rely too much on supervisor discretion or that are limited in intervention types (i.e., EIS that focus on coaching only).⁹ Recognizing that questions remain regarding the overall effectiveness of EIS, law enforcement leaders are encouraged to partner with data scientists (e.g., university faculty or local crime analysts) to ensure evidence-based procedures related to EIS are developed and implemented.¹⁰

III. CONCLUSION

Employers are responsible for the conduct of their employees. However, tracking employee performance is a difficult task to accomplish without an organized, methodical approach. An EIS provides agencies with a means to routinely track employee performance through the regular collection of data, identification of thresholds and targeted behaviors or experiences that warrant inspection, generation of reports for supervisor review, and, ultimately,

⁷ Robert E. Worden et al., "Intervention with Problem Officers: An Outcome Evaluation of an EIS Intervention," *Criminal Justice and Behavior* 40 (April 2013): 410–438.

⁸ Jennifer Helsby et al., "Early Intervention Systems: Predicting Adverse Interactions Between Police and the Public," *Criminal Justice Policy Review* 29, no.2 (2018): 190–209, <https://doi.org/10.1177/0887403417695380>.

⁹ See footnote 6.

¹⁰ See the IACP Policy Center documents on Law Enforcement-Research Collaborative Partnerships available at <https://www.theiacp.org/resources/policy-center-resource/research-partnerships>.

intervention where necessary to address employee performance concerns. As a tool that may help agencies identify officers in need of support and intervention before their performance suffers, EIS can assist agencies as they strive to help their employees reach their full potential.

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