



TML Risk Pool
Support for Excellence in Law Enforcement
Progress Report
June 16, 2025

Introduction

The landscape of policing is rapidly evolving. A wide range of issues, including poverty, homelessness, poor educational opportunities and outcomes, limited job opportunities, and mental health and addiction issues contribute to crime. Law enforcement may not be prepared to directly influence all those factors, but officers responding to calls are expected to deal with them. Perhaps even more important is the dearth of officers. Agencies are understaffed, which leaves precious few resources for external training and other improvement efforts. Also, officers face their own mental health challenges, which in some agencies still carry a stigma. The TML Risk Pool wishes to direct resources to help Member agencies better understand risk management, stay safe, and police with professionalism.

In 2023, Staff presented the Board with a *Summary of Actions*, which was based on a 2022 planning session initiative, a 2023 *Preliminary Report* and Board of Trustees discussion, and input from Member police chiefs. Over the last 20 months, the summary served as a high-level directive for how Staff has allocated the Pool’s law enforcement resources. The primary goal of the Pool’s *Support for Excellence in Law Enforcement* initiative is to allocate resources in a way that helps Member law enforcement agencies deal with the challenges of modern policing. The secondary goal is to reduce law enforcement claims.

What’s in this Report

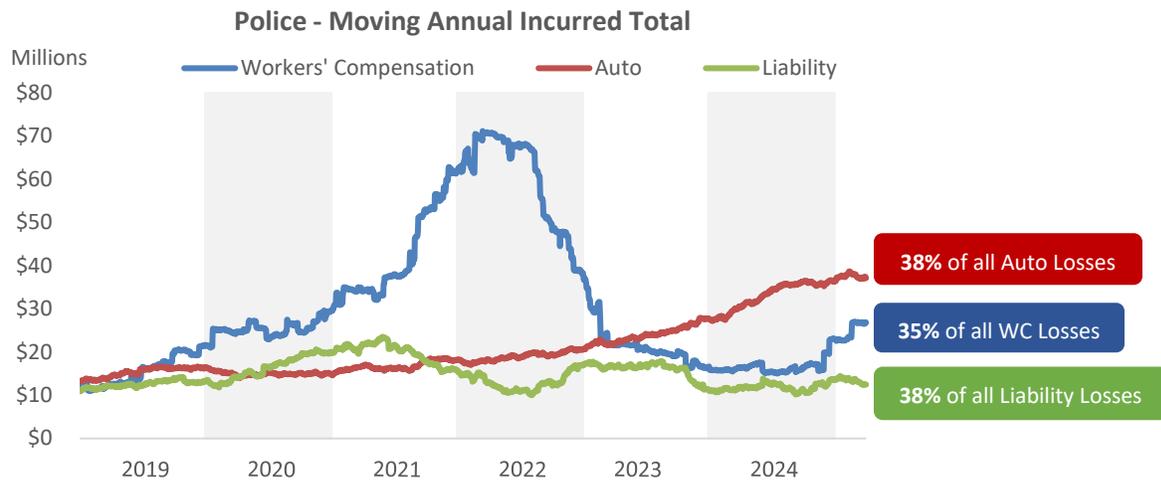
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The process thus far has shown that the Pool’s loss prevention efforts can help shape the psychological climate of policing. This initiative is on the right track, and constant minor revisions will lead to future successes.

The Data

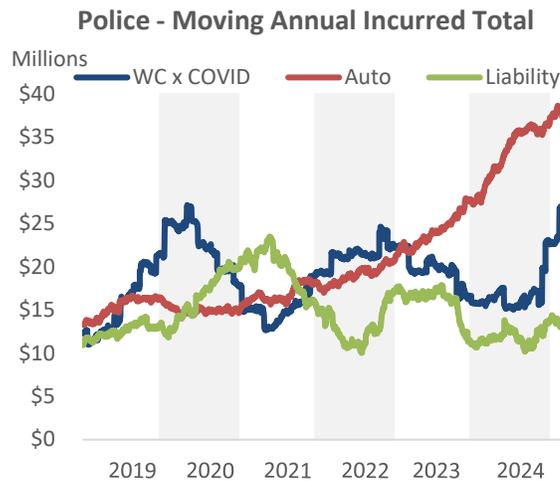
In 2020, the Pool experienced an increase in law enforcement liability activity, coinciding with heightened media attention on social justice issues nationwide. Loss activity reached its peak in 2021, prompting the Pool to launch an initiative aimed at resetting/revitalizing its law enforcement training programs. The chart below highlights the volatility across all law enforcement related lines (excluding property). Workers’ compensation losses surged following enactment of COVID-19 presumption in 2021. Since the pandemic (and the 2023 expiration of the COVID-19 presumption), activity in both workers’ compensation and liability lines has subsided, while auto-related claims have shown a consistent upward trend.

The red, blue, and green boxes to the right show the percentage of law enforcement-related losses by line. In total, these losses account for \$76.4 million, or 37% of the most recent year of losses within these lines.



Note: Auto Losses include both Auto Liability and Auto Physical Damage (APD) coverages. Liability Losses include General Liability, Errors & Omissions and Law Enforcement Liability coverages.

The impact of COVID-19 on workers' compensation was significantly greater than on other lines of coverage. When COVID-19 losses are excluded, the underlying trends across all lines become more pronounced, as shown in the chart below. The most concerning trend is in auto, where annual losses have reached \$37 million – nearly triple the amount recorded four years ago. In contrast, law enforcement liability losses are currently trending near a six-year low. Meanwhile, workers' compensation, excluding COVID-19, has exhibited considerable volatility. This fluctuation is primarily driven by year-to-year variations in fatality-related claims.



Given the varying trends across these three lines, this initiative has expanded its scope to take a more comprehensive approach to improving law enforcement related outcomes. What began as a 2022 focus on law enforcement liability coverage has evolved into a more holistic strategy addressing law enforcement exposure across all applicable lines of coverage.

When agencies are stratified into similar group categories by size, the number of agencies in each category is negatively correlated to size of agencies. Similar to Pool Membership, stratifying agencies into size-

based categories reveals fewer larger sized agencies than smaller agencies. This negative correlation between category size and number of agencies within each is illustrated in the charts below.



Department size has historically been a statistically significant factor in analyzing loss activity. The table below details how department size affects claim size across different lines of coverage.

2022-23 Loss Year

	Department Size	# of Members	AL	APD	LEL	E&O	WC	Total
Total Incurred	1-19	526	\$3,258,665	\$1,928,723	\$2,161,959	\$1,064,338	\$4,361,393	\$12,775,078
	20-49	167	\$4,289,162	\$2,434,113	\$5,621,032	\$822,084	\$3,590,028	\$16,756,420
	50+	92	\$7,694,716	\$4,857,364	\$6,711,024	\$375,000	\$10,345,360	\$29,983,463
	Total	785	\$15,242,544	\$9,220,199	\$14,494,015	\$2,261,423	\$18,296,781	\$59,514,962
Claim Count	1-19	526	102	324	51	13	434	924
	20-49	167	160	419	84	15	917	1,595
	50+	92	314	825	261	7	2,229	3,636
	Total	785	576	1,568	396	35	3,580	6,155
Average Claim	1-19	526	\$31,948	\$5,953	\$42,391	\$81,872	\$10,049	\$13,826
	20-49	167	\$26,807	\$5,809	\$66,917	\$54,806	\$3,915	\$10,506
	50+	92	\$24,505	\$5,888	\$25,713	\$53,571	\$4,641	\$8,246
	Total	785	\$26,463	\$5,880	\$36,601	\$64,612	\$5,111	\$9,669

Average claim size generally correlates with department size across all coverages, with the exception of auto physical damage (APD). Workers' compensation, law enforcement liability and errors & omissions coverages exhibit the greatest variance in average claim based on department size.

The table below details how department size affects the loss per officer metric across different lines of coverage.

2022-23 Loss Year

	Department Size	# of Members	AL	APD	LEL	E&O	WC	Total
# of FT Arrest Officers Members with claims	1-19	329	927	2,105	455	131	2,319	N/A
	20-49	165	3,009	4,218	1,894	342	4,588	N/A
	50+	91	9,768	9,828	8,834	721	9,172	N/A
	Total	585	13,704	16,151	11,183	1,194	16,079	N/A
Loss Per Officer Members with claims	1-19	329	\$3,515	\$916	\$4,752	\$8,125	\$1,881	N/A
	20-49	165	\$1,425	\$577	\$2,968	\$2,404	\$782	N/A
	50+	91	\$788	\$494	\$760	\$520	\$1,128	N/A
	Total	585	\$1,112	\$571	\$1,296	\$1,894	\$1,138	N/A
# of FT Arrest Officers Members with coverage	1-19	526	3,836	3,836	3,914	3,914	3,802	N/A
	20-49	167	4,935	4,935	5,036	5,036	4,693	N/A
	50+	92	10,196	10,196	10,800	10,800	9,172	N/A
	Total	785	18,967	18,967	19,750	19,750	17,667	N/A
Loss Per Officer Members with coverage	1-19	526	\$849	\$503	\$552	\$272	\$1,147	N/A
	20-49	167	\$869	\$493	\$1,116	\$163	\$765	N/A
	50+	92	\$755	\$476	\$621	\$35	\$1,128	N/A
	Total	785	\$804	\$486	\$734	\$115	\$1,036	N/A

The upper section of the table above considers exposures (full-time officers with arrest authority) for only those members incurring a loss. This narrower view of exposures creates a correlation between department size and loss per officer metric. The lower section of the table expands the analysis to include exposures for all members with law enforcement exposures. When considering all law enforcement exposures, the loss per officer remains consistent across all department sizes.

These metrics will serve as the foundation for future analysis across the multiple lines of coverage. Clustering algorithms will be used to group high-dollar claims based on common attributes, helping to identify member' departments that require the most attention for risk management services and mitigation strategies.

Updates

The data above show that Members – with the Pool's assistance – can use risk mitigation strategies to avoid negative outcomes. This iterative *Progress Report* provides an update on: (1) the continuing evolution of the law enforcement outreach consultant positions; (2) the continuing value of partnership through collaborative efforts; (3) the development of risk management-focused consultations and training for law enforcement leaders; (4) police agency accreditation; and (5) continued monitoring – and support when appropriate – of the Texas Commission on Law Enforcement.

At the time this *Progress Report* was prepared, the 89th Texas Legislature was still in session, and it's possible that legislation could affect some of the items in it. Staff will provide an update at the appropriate board meeting if that's the case.

Here are the updates:

1. The continuing evolution of the law enforcement outreach consultant positions.

The Pool is adapting to the evolving needs of Member law enforcement agencies. In the mid-1990s, the Pool started a law enforcement training program to help Members respond to topics identified by claims data. In the early 2000s, the Pool hired a full-time "Law Enforcement Training Specialist" to develop and deliver training programs for law enforcement personnel. The role was designed to enhance the skills and knowledge of law enforcement staff, but the changing landscape of policing demanded a more comprehensive approach.

In response – and as reported in the 2023 *Summary of Actions* – the Pool converted the Law Enforcement Training Specialist position to a "Law Enforcement Outreach Consultant (LEOC)" position and added a second LEOC position. The new positions provide a wider range of services, which still include training but also add more focus on consultations and other support. The change is designed to foster a partnership between the Pool and law enforcement agencies.

One of the challenges identified in the 2023 *Summary of Actions* was finding experienced law enforcement professionals with the following additional skills:

- Communication skills necessary to interact with law enforcement leaders.
- Presentation skills to provide effective training for law enforcement agencies.
- Existing relationships with law enforcement leaders in Texas, with the ability to interact with Member law enforcement agencies, the Texas Police Chiefs Association (TPCA), TPCA's Officer Safety Committee, Regional TPCA groups, conferences, TCOLE, and other groups and associations.

- Understanding of the importance of maintaining or creating a partnership with TPCA.
- Knowledge of TCOLE rules and regulations and impact on the Pool and its Members.
- Understanding risk management principles – specifically how risk management practices apply to law enforcement operations.

Pool Staff worked tirelessly to find two such candidates – former San Marcos police chief and assistant city manager Charles “Chase” Stapp and former Rockwall police captain Joseph Florance.

Why are Chase’s and Joe’s LEOC positions producing beneficial outcomes for police agencies? Because the Pool’s Safety and Loss Control Consultants typically aren’t former law enforcement officers, they haven’t had great success building relationships with law enforcement leaders. That’s where the Pool’s LEOCs come in. As indicated in the 2023 *Summary of Actions*, the importance of solid, long-lasting relationships cannot be overstated. A LEOC can capitalize on their own credibility and leverage the connection to build trust with fellow law enforcement officers. Once that trust is built, Members tend to be much more comfortable using the Pool’s resources.

Trust and shared experiences.

A LEOCs background more easily gets them meetings with police leaders to keep those leaders informed about their claims and loss data, and Pool resources available to them. Their efforts include a formal review of claims data to identify trends that are common in the law enforcement profession and/or unique to individual police agencies. That information helps agencies better direct training and other resources. One example of this is an experience Mr. Stapp had not long after starting employment with the Risk Pool. One of the Safety and Loss Control Consultants was having difficulty getting a law enforcement consultation scheduled with a member using the traditional avenue of working through the fund contact. Mr. Stapp suggested that he could reach out directly to the chief of the Member agency with an introduction and an attempt to get the consultation scheduled. Within about five minutes of sending the email, Mr. Stapp received a reply from the agency chief and was able to schedule the consultation.

Comprehensive risk assessments are also a fundamental aspect of these consultations. These evaluations systematically identify potential exposures across various operational areas. The findings from these assessments provide a structured foundation for discussing risk mitigation strategies, ensuring agencies are aware of vulnerabilities and actively implementing measures to address them. After coming to the Risk Pool, Mr. Stapp and Mr. Florance shared similar observations – neither knew enough about the data resources available from the Risk Pool while serving in their respective agencies. During consultations, Mr. Stapp and Mr. Florance have drawn on these observations to impress upon Member chiefs how important it is to use loss data to conduct these reviews. During a recent consultation, one chief expressed to Mr. Stapp that he planned to begin quarterly loss reviews with his city’s risk manager after seeing value in the information presented during the consultation.

The LEOCs continue to provide some in-person training programs to address common areas of exposure, and the Pool also contracts with LocalGovU to provide free online training to Members. LocalGovU’s law enforcement specific courses are eligible for continuing education credit through the Texas Commission on Law Enforcement (TCOLE).

Building relationships with law enforcement leaders is a key part of the Pool's strategy. LEOCs continue to identify influential law enforcement organizations and partner with them to provide training and resources to Pool Members. The goal is to facilitate change and minimize exposures, while supporting the Pool's *Support for Excellence in Law Enforcement* initiative. The LEOCs will also continue to generate ideas, future direction, feedback, and requests for training from Members. Once they are recognized as a "trusted resource," agencies and decision-makers are more likely to reach out in times of need and implement recommended strategies.

Mr. Stapp shared a recent example of the power of building these relationships: In late 2024 while reviewing claims, he came across one wherein an officer was shot in the leg by his own pistol, while the pistol was secured inside its holster. Recognizing this incident as an extreme anomaly, Mr. Stapp reached out to the chief of the Member agency to inquire about the incident. After a lengthy conversation, that same chief called back to report two similar incidents involving the same model of handgun at two different agencies in Texas. This type of open communication would not be possible without the time and effort put into building relationships with Members.

Future LEOC efforts.

Loss Prevention, with support from the Pool's Report and Analytics staff, uses claims data to analyze historical loss trends and emerging risks, helping to prioritize exposures and inform on potential risk mitigation strategies. Claim and loss information from the Member Dashboard is regularly recommended to supplement data provided by Risk Pool staff.

Looking forward, the integration of technology and data-driven decision-making is becoming increasingly vital in law enforcement risk management, allowing agencies to proactively identify, assess, and mitigate exposure to loss. By leveraging predictive analytics, artificial intelligence, and real-time data collection, law enforcement agencies can make more informed decisions regarding training priorities, resource allocation, policy adjustments, and achieve desired outcomes. These tools improve operational efficiency and enhance transparency and accountability, which are critical to managing risk.

In addition, AI has significant potential to further enhance risk management efforts through advanced predictive analytics tools and more. These technologies could help detect patterns in claims data, identify high-risk behaviors, and forecast potential liability issues before they materialize. AI-driven early intervention systems, for example, can identify officers or functional units exhibiting patterns of behavior that correlate with increased risk, allowing agencies to implement corrective actions through training, policy adjustments, or wellness support. Additionally, real-time data visualization tools and interactive dashboards could provide law enforcement leaders with dynamic insights into risk exposures, enabling more responsive decision-making.

2. The continuing value of partnership through collaborative efforts.

The TML Risk Pool has long recognized the importance of partner organizations that have shared purposes and goals. Partnering with these groups represents a forward-thinking approach to law enforcement risk management. The partnerships offer numerous benefits, including: (1) enhanced officer safety; (2) data-driven decision making; (3) resource efficiency; (4) cultural change; and (5) legal and financial risk mitigation. The following are examples of those partnerships:

Texas Police Chiefs Association

The partnership with the Texas Police Chiefs Association (TPCA) is vitally important to address officer safety, risk management, and law enforcement training. The Pool has collaborated with TPCA for decades and the partnership has become much more effective and comprehensive in recent years.

In 2011, the Pool began funding first year fees for Member agencies seeking accreditation. Since 2011, the Pool has provided more than \$120,000 to support Member agencies seeking accreditation. In addition, that year the Pool began promoting TPCA's "Sample Policy Manual." The manual eliminated the need for Loss Prevention's prior "Sample Guidelines for Developing Policies and Procedures for Law Enforcement," which was time consuming to distribute and update.

Over the years, the partnership has expanded significantly, particularly in the areas of officer safety and risk mitigation. That began when TPCA's Officer Safety Committee invited Loss Prevention staff to attend a presentation about the VINCIBLE initiative. Since that introduction in 2016 and through 2025, the Pool has provided \$376,000 of funding to the Committee for VINCIBLE and other initiatives.

The partnership with the Officer Safety Committee continues to grow with several Pool staff participating on a "steering committee" that supports the VINCIBLE effort. VINCIBLE was developed in response to a troubling statistic: as much as 50 percent of officer deaths in some years are attributed to controllable behaviors. The initiative sought to embed a safety-conscious culture within law enforcement agencies by addressing preventable risks through five fundamental principles:

1. **Wear Your Armor** – Encouraging officers to consistently wear body armor and protective vests.
2. **Buckle Up** – Reinforcing the necessity of seatbelt use to prevent fatalities in vehicle-related incidents.
3. **Slow Down** – Promoting speed control to reduce accidents and injuries.
4. **Stay Fit** – Highlighting the importance of both physical and mental fitness in officer performance and safety.
5. **540 Awareness** – Training officers to maintain situational awareness in all directions, both horizontally (360 degrees) and vertically (180 degrees).

These core principles are reinforced through weekly roll-call training sessions, made freely available to participating law enforcement agencies. The Pool continues to play a crucial role by supporting the ongoing initiative and ensuring adequate funding. In recognition of the tenth anniversary of VINCIBLE's creation, the Pool presented its Partnership Award to the Officer Safety Committee and the VINCIBLE program in February 2025.

The Pool's financial and strategic support has enabled the Officer Safety Committee to enhance and expand VINCIBLE. Initially, funding was allocated for marketing and promotional efforts to increase program visibility. However, over time, the funding has been used for:

- Developing a dedicated VINCIBLE website (www.vincible.org).
- Producing specialized training videos and instructional materials.
- Sponsoring speaking engagements at law enforcement conferences.
- Supporting targeted safety initiatives aimed at reducing officer injuries and fatalities.
- Providing direct training programs to law enforcement agencies.

By integrating VINCIBLE into officer training programs, the Pool and TPCA have significantly contributed to changing police culture, reducing risk-prone behaviors, and – ultimately – saving lives.

Both Mr. Stapp and Mr. Florance serve on the TPCA Officer Safety Committee and take an active role in reviewing and sometimes creating content for roll call trainings. This level of collaboration has kept the relationships strong with the committee members and leadership. Specifically, the Officer Safety Committee recently began conversations with leadership at TCOLE regarding a process through which officers can earn continuing education credit for participating in VINCIBLE roll call training. Both Mr. Stapp and Mr. Florance are involved in the development of the process to make this a reality.

Institute for Law Enforcement Administration

The Pool learned of the Institute for Law Enforcement Administration (ILEA) in 2016 while searching for a means of providing a comprehensive training program for first line supervisors. TCOLE Rule 3737 mandates a minimum of 20 hours of instruction on general subject matter related to:

- Commission Rules
- Role Identification
- Values, Ethics, and Principles
- Communication
- Leadership Styles
- Counseling
- Liability and Civil Rights Issues
- Planning and Organizing
- Civil Rights, Racial Sensitivity, and Cultural Diversity
- Special Investigative Issues
- The Transition from Officer to Supervisor

While the topics above meet minimum TCOLE requirements, feedback from law enforcement leaders through a survey in 2016 indicated the need for a better leadership foundation for new supervisors. Working with ILEA, the Pool helped develop a two-week “Texas Sergeant’s Academy” program with 70 hours of instruction for new supervisors. As of May 2025, the Pool has spent over \$400,000 to train nearly 1,000 first line supervisors.

The program has evolved considerably, and feedback from attendees indicate the program is “hitting the mark.” The program provides structured, high-quality training that exposes participants to leadership concepts, legal considerations, and risk mitigation strategies. By equipping sergeants and supervisors with critical thinking skills and best practices, these programs help reduce liability exposures, improve officer performance, and foster a culture of accountability. Annual reviews of content ensure the curriculum remains relevant.

Strengthening partnerships with the Law Enforcement Management Institute of Texas, Individual Police Agencies, the Meadows Institute, and the Texas A&M Engineering Extension Service.

The Pool is actively collaborating with numerous organizations that play crucial roles in law enforcement education, certification, and professional development:

- **Law Enforcement Management Institute of Texas:** Loss Prevention is continually seeking to build new relationships with organizations relevant to law enforcement. Recently, discussions were initiated with executive leadership at the *Bill Blackwood Law Enforcement Management Institute of Texas* (LEMIT), a premier institution for law enforcement education and professional development. The Pool will be presenting a proposed four-hour block of instruction related to law enforcement risk management to a LEMIT focus group in September. If approved, the program would be included in the mandated Texas Police Chiefs Leadership Series (TPCLS) and the Command Staff Leadership Series (CSLS) training. By partnering with LEMIT, the Pool can influence law enforcement leadership at the highest levels, ensuring that safety and risk management remain a priority in Texas law enforcement agencies.
- **Individual Police Agencies:** The partnerships between the Pool and individual agencies have grown tremendously over the last year as the role of the LEOCs has become better defined. For example, an existing relationship with City of Allen Police Chief Steve Dye has led to a newly-created program called *Co-Creating a Culture of Wellness in Public Safety Agencies*, which focuses on emotional wellness and the critical role of comprehensive well-being for first responders who operate in high-stress environments. (This new program builds on the previous *Responding to Social Change: City and Law Enforcement Leaders' Opportunity to Adapt and Thrive* program that was developed by Steve Dye and Marcel Brunel of Dignity, Inc.)
- **Meadows Institute “Blue Chip” Program:** Through a collaboration with the Meadows Mental Health Policy Institute (the Meadows Institute), the Pool has entered into a “pilot project” to provide funding that will support services offered to law enforcement officers. The service includes confidential and anonymous access to mental health services without traditional barriers, such as stigma and self-disclosure, that often deter officers from seeking help.

A simple yet effective method of utilizing a “blue poker chip” as a form of payment, allows officers to directly access trauma-informed, culturally-competent counseling without involving their employer, workers’ compensation, or other insurance. This innovative approach fosters a sense of trust and autonomy, allowing officers to prioritize their mental health without fear of judgment or professional repercussions.

- **Texas A&M Engineering Extension Service:** The Texas A&M Engineering Extension Service (TEEX) Regional Extension Program provides training and technical assistance to local Texas law enforcement agencies as a part of the Governor’s *Keeping Texas Prepared* initiative. They accomplish this through the work of six regional managers in their law enforcement extension program. These managers deliver onsite training for agencies in topics such as crime scene investigation, photography for patrol officers, and de-escalation techniques. Shortly after being hired in April of 2024, LEOC Chase Stapp met with three of the TEEX Law Enforcement Regional Managers in Waco to discuss how their training efforts and those of the Risk Pool Law Enforcement Outreach Consultants might complement one another. Pool staff hopes to build on this conversation in the coming months.

3. Develop risk management-focused consultations and training for law enforcement leaders.

Managing risk in law enforcement is inherently complex due to the unpredictable nature of police work, the legal, ethical, and moral constraints within which officers must operate, and the high-stakes consequences of adverse events. Unlike other operations or industries where risks can be minimized through standardized procedures or other controls specific to individual tasks, law enforcement officers often face rapidly evolving situations, requiring split-second decisions that can lead to significant exposure.

One of the primary challenges is balancing officer safety with the safety of the public. Officers must make judgment calls in high-pressure environments, such as use-of-force incidents, vehicle pursuits, and mental health crisis responses. Each of these scenarios presents unique risks, and failure to act appropriately can result in injury, loss of life, lawsuits, and reputational damage to the agency. The following are examples of focused consultation and training efforts:

- **Vehicle Operations:** Vehicle operations – including emergency response driving, pursuits, and general patrol – remain a significant exposure for law enforcement agencies and the Risk Pool. While many agencies have established comprehensive policies and conduct regular training in these areas, claims and associated losses continue to rise. Understanding the specific causes of crashes, identifying contributing factors, and implementing effective risk controls remain top priorities. By analyzing incident data and evaluating best practices, agencies can enhance officer safety, reduce liability, and improve overall operational outcomes.

The Law Enforcement Outreach Consultants are making an intentional effort to bring awareness to the rise in auto liability and auto property claims by presenting the data at every available opportunity. This includes presentations at events like the Texas Police Chiefs' Association conference and during consultation meetings with police leaders at their individual agencies. This discussion is followed with information about the Pool's loss prevention services for law enforcement, including the Safe Police Vehicle Operations training program. The feedback from police leaders has been consistently positive with police leaders making specific requests for consultation services.

- **Legal and Policy Compliance:** Agencies must ensure that officers are aware of and follow constitutional standards, state laws, and agency policies, which can be difficult in dynamic situations. Inconsistent training, lack of resources, or outdated policies can further increase exposure to loss.
- **Technological Advancements:** Body-worn and dashboard cameras, cell phones, and social media have increased transparency, but they also expose agencies to heightened public scrutiny and potential legal challenges. Likewise, in-car computer systems have become essential tools for communication between officers and dispatchers, but they also lead to officer distractions while operating vehicles, which accounts for a significant portion of driving-related claims and losses.
- **Workforce Management:** Hiring, training, and retaining qualified officers are crucial to mitigating risk. A lack of proper training in potentially high-risk or critical task situations can lead to poor decision-making and increase the chances for things to go awry. Also, many agencies operate at a staffing deficit, requiring extensive overtime or fewer days off for officers, which can lead to challenges when training and may affect officer safety and possibly decision-making.

- **Officer Wellness and Resilience:** Recognizing the demanding and often traumatic nature of law enforcement work, agencies should be adopting comprehensive wellness and resilience strategies that address officers' physical, mental, and emotional well-being. While many agencies have successfully implemented physical fitness programs, addressing mental and emotional health remains a greater challenge due to longstanding stigmas. Historically, seeking support for stress, trauma, or emotional struggles has been viewed as a sign of weakness, often discouraging officers from utilizing available resources. However, there is a growing cultural shift within law enforcement that promotes mental wellness as an integral component of professional readiness and long-term career sustainability.

To support this shift, the Risk Pool currently offers training programs focused on officer wellness and resilience, helping agencies recognize the critical need for mental health resources and peer support initiatives. These programs educate officers and leadership on the importance of stress management, trauma-informed care, and early intervention strategies to prevent burnout and long-term psychological harm. In addition to these training efforts, the Risk Pool is exploring further engagement through the Texas Blue Chip Program discussed above.

Ultimately, effective risk management in law enforcement requires comprehensive policies, continuous training, strong leadership, and accountability measures. Proactive intervention approaches to address and correct unwanted behaviors and ongoing officer development can help agencies navigate the inherent risks of policing while maintaining public trust. The underlying idea is that bad outcomes sometimes begin with quiet management tolerance of smaller infractions: unspoken tension, poor communication, weak supervision, and resistance to coaching. When leaders develop the ability to notice, respond, and support early, the long-term outcomes shift. That is where the actual rewiring begins – not by confronting the entire system at once, but by making consistent, intentional adjustments at the micro level.

4. Encourage and financially support law enforcement agency accreditation.

Twenty (with two in process) Texas municipal law enforcement agencies are currently accredited by the Commission on Accreditation for Law Enforcement Agencies (CALEA). The TPCA Best Practices Program is a similar process whereby police agencies in Texas prove their compliance with 173 Texas law enforcement best practices. These best practices are developed by Texas law enforcement professionals and relate to delivery of service, reduction of risk, and protection of individuals' rights. Compared to the CALEA accreditation, the TPCA Best Practices Accreditation Program is easier to administer, lower in cost, and is designed specifically for Texas law enforcement agencies.

Two-hundred-eighteen Texas law enforcement agencies have been accredited through the TPCA Program with an additional 51 currently in the process. Of those, only 32 have fewer than 20 officers.

Since 2010, the Risk Pool – through a partnership with TPCA – has made funds available to assist with the initial fees associated with the accreditation process. Thus far, 120 Members have used about \$120,000 of this funding.

Pool staff anticipates that accredited agencies will raise standards of professionalism and reduce claims. While it can't be said that accreditation *causes* claims costs to be lower, Pool claims data does seem to show that *correlation*. Pool staff reviewed 797 law enforcement

agencies, of which 524 employ fewer than 20 officers. Out of 797 Members, 6.3% of 650 non-accredited members had loss totals above \$2,000 per arresting officer, versus 2.0% of 147 accredited members. Again, this data is not definitive, but it may indicate a relationship between accreditation and the amount of covered losses per officer.

Pool data also indicates that accredited agencies have lower average costs per claim than non-accredited agencies. The following table shows that – for the period between October 2015 and September 2020 – the average total incurred losses for a law enforcement liability claim for a non-accredited agency is about \$17,000 (or 84%) higher than the average for an accredited agency.

	Total Incurred	# of Claims	Avg. claim
Accredited	\$22,653,994	1,096	\$20,670
Non-Accredited	\$31,891,291	846	\$37,697

While the total incurred losses per officer is less for accredited agencies, the number of claims per officer is actually *greater*. Why is that? It’s not entirely clear, but it could be that accredited agencies tend to be larger, which may lead to more encounters and thus more claims. Also, larger agencies with formal policies may have more stringent reporting requirements for incidents.

Legislation passed in 2023 (S.B. 267 by Phil King) would have mandated that law enforcement agencies employing at least 20 peace officers be accredited by September 1, 2029, and provided a grant program to assist with the initial costs of doing so. Despite the legislature’s clear belief that accreditation matters, the governor later vetoed the bill. In any case, the Pool covers 797 full authority law enforcement agencies, of which 524 or 66% employ *fewer* than 20 officers. That means the Pool has a role to play with financially assisting at least those smaller agencies. Board Trustee input indicates that underwriting incentives typically get “swallowed up” by a city’s larger budgeting process, which means direct financial support is a better option.

To that end, the Pool will continue to support Member accreditation through the TPCA’s Law Enforcement Best Practices Accreditation Program by funding first year fees for Member agencies that enter the process. Pool staff meets periodically with TPCA about how to best use funding to entice and support Member agencies that are pursuing initial or renewal accreditation. Pool staff will coordinate with TPCA to discuss legislative strategies relating to legislation similar to S.B. 267 that may become law in 2025 or later.

5. Continuing to monitor – and support when appropriate – the Texas Commission on Law Enforcement.

In 2022, the Sunset Advisory Commission considered whether to continue the functions of the Texas Commission on Law Enforcement. That review led to an informal discussion of agency accreditation at a December 2022 hearing, but the TCOLE sunset bill did not include anything related to it. Instead, the 2023 sunset bill (S.B. 1445) significantly expanded TCOLE’s authorities and responsibilities. The legislation, effective September 1, 2023, introduced several key changes aimed at enhancing transparency, accountability, and operational efficiency within Texas law enforcement agencies.

- ***Continuation and Oversight***

Under S.B. 1445, TCOLE’s existence was extended until September 1, 2031, under the Texas Sunset Act. This extension underscored the legislature’s

commitment to maintaining a regulatory body dedicated to overseeing law enforcement standards and practices. The bill also mandated that TCOLE undergo periodic reviews to ensure its functions align with evolving law enforcement needs and public expectations. This review process should ensure that TCOLE remains a relevant body in meeting the goals of the legislature relevant to excellence in Texas law enforcement.

- ***Rulemaking Authority***

S.B. 1445 emphasized and expanded TCOLE’s explicit rulemaking authority in several areas, including:

- **Misconduct Reporting and Investigations:** TCOLE is empowered to define “misconduct” and establish procedures for reporting and investigating such incidents. This includes setting standards for how law enforcement agencies report misconduct and how investigations are to be conducted. The new rules resulting from the bill either restricted or clarified much of the discretionary authority previously vested in agency heads.
- **Fitness-for-Duty Examinations:** The new rules established processes and model policies through which employing agencies can require licensees to undergo medical or psychological evaluations for just cause to determine their fitness for duty. Refusal to submit to such examinations must be reported to TCOLE, which can then issue orders compelling compliance.
- **Establishment of Appointing Entities:** TCOLE has the authority to set criteria for the establishment and continued operation of agencies which appoint peace officers, ensuring that agencies meet defined standards before being authorized to appoint or employ peace officers. The new administrative rules codified these standards for all employing agencies and require annual reports to be submitted by agencies to show proof of compliance.

- ***Model Policies and Standards***

In alignment with its expanded rulemaking powers, TCOLE has developed and adopted model policies to guide law enforcement agencies statewide. The corresponding new administrative rules make adoption of certain policies mandatory for all Texas law enforcement agencies. These policies address critical areas such as:

- **Misconduct Allegations:** Providing a framework for agencies to handle allegations of misconduct, ensuring consistency and fairness in investigations and disciplinary actions.
- **Hiring Procedures:** Establishing standardized hiring practices to promote the recruitment of qualified and competent personnel using thorough background investigation processes.
- **Personnel Files Management:** Outlining procedures for the maintenance and accessibility of personnel records, enhancing transparency and accountability.
- **Medical and Psychological Examinations:** Setting guidelines for conducting fitness-for-duty evaluations to ensure officers can perform their duties effectively and safely.
- **High Risk Police Activities:** Requiring all agencies employing peace officer licensees to adopt policies in each of 18 critical areas, including but not limited to: Use of Force, Vehicle Pursuits, Domestic Violence, Active Attack, Impartial Policing, and Secondary/Off-duty Employment.

- ***Enhanced Accountability Measures***

S.B. 1445 introduces measures to bolster accountability within law enforcement agencies:

- **Reporting Refusals for Examinations:** Agencies are required to report any refusal by a licensee to submit to mandated medical or psychological examinations. TCOLE is then authorized to issue orders requiring the licensee to demonstrate valid reasons for such refusal.
- **Disciplinary Actions:** TCOLE has the authority to take disciplinary action against licensees found in violation of established standards, ensuring that misconduct is addressed promptly and appropriately.
- **Reporting for minimum agency standards:** TCOLE will require all law enforcement agencies in Texas to submit an annual report on a form prescribed by the Commission proving compliance with all new standards required for continued operation in the State.

The enactment of S.B. 1445 has significantly expanded TCOLE’s role in regulating and overseeing law enforcement in Texas. Through enhanced rulemaking authority, the development of comprehensive model policies, and the implementation of stringent accountability measures, TCOLE is better equipped to uphold the integrity and professionalism of law enforcement agencies across the state.

The Risk Pool’s goal to *Support Excellence in Law Enforcement* aligns with TCOLE’s new and expanded role. As a result, we will continue to build on our relationships with executive leadership at TCOLE to look for mutual areas of positive growth potential for Texas law enforcement agencies.

Conclusion

The Pool is still early in its transition from primary law enforcement interactions originating from a training environment through a single Law Enforcement Training Specialist position, to the two Law Enforcement Outreach Consultant roles that were established with Board support through *The Pool’s Role in Supporting Excellence in Law Enforcement* report in 2023. The Pool is already reaping benefits from this change, primarily through improved relationships with law enforcement agencies and other organizations, while at the same time better defining how the role can become more effective. The Pool will continue to evaluate its support of law enforcement in Texas using the experiences of other risk pools, input from trusted resources, and most importantly, feedback from law enforcement members of the Risk Pool. As mentioned at the start of this update, the landscape of law enforcement continues to evolve, and the Risk Pool must be committed to evolving to ensure we remain a trusted resource for our members.

As is evident, the Pool’s Loss Prevention Department and LEOCs are using the board’s high-level direction to bring resources to bear as a means to support the Pool’s law enforcement Members. They’ll continue to strive to promote accountability and continuous improvement – such as claims/losses, policy review, early intervention strategies to modify behaviors, and much more – to hopefully stop incidents and claims *before* they arise.