



## Cover Memorandum

### Interactions with LGBTQ+ Individuals, JHPD Directive #107

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#### **Purpose of the Directive**

The purpose of this Directive is to provide Johns Hopkins Police Department (JHPD) members with procedures to appropriately and respectfully interact with members of the LGBTQ+ community, and to make clear specific prohibitions for when they interact with members of the Lesbian, Gay, Bisexual, Transgender, Queer and/or Questioning (LGBTQ+) community.

#### **Summary of Directive Requirements**

This Directive requires that members interact with LGBTQ+ persons in an unbiased, fair, and respectful manner, and that calls for service and complaints by such individuals be investigated with diligence and vigor. The Directive prohibits harassment and discriminatory practices based on a person's gender identity, gender expression, or sexual orientation.

The Directive provides specific requirements meant to prevent discriminatory policing and designed to support respectful encounters with LGBTQ+ individuals. For example, this Directive includes a section on culturally aware language and provides specific terminology for members to use and avoid. The Directive also dictates that members shall not intentionally deadname or misgender any person after that person has made their name and/or pronouns known to the member.

The Directive details required procedures for searches, seizures, arrests, transport, and medical treatment in such a way that respects and accommodates a person's identity and personal needs.

The Directive also includes strict rules prohibiting JHPD members from stopping, questioning, or arresting a person for using a restroom based on the member's knowledge or perception of the person's gender identity, gender expression or sexual orientation. Furthermore, the Directive limits the disclosure of a youth's gender identity, gender expression or sexual orientation to their parent/guardian without their consent, and it requires JHPD media releases to refer to transgendered persons using their provided name and gender identity and, if unknown, to use gender-neutral pronouns.

The Directive requires introductory and ongoing training for all JHPD members on its contents.

#### **Blueprint for the Policy Development Process**

The draft JHPD policies (hereinafter referred to as "directives") shared for community feedback are based on examples of 21st century best practices in public safety policy, identified through extensive benchmarking of university and municipal law enforcement agencies across the nation. Taken together, they represent a comprehensively progressive approach to policing that prioritizes equity, transparency, accountability, and community-based public safety strategies.

The JHPD's draft directives embody approaches that community advocates and leading experts have championed locally and in law enforcement reform efforts across the nation. The draft directives have also been developed based on input received through robust community engagement in prior phases of JHPD development, including suggestions received in the legislative process as well as last fall's Memorandum of Understanding (MOU) public comment period and feedback opportunities.

In addition, the directives were drafted to exceed the minimum requirements of the Constitution and laws of the United States and the State of Maryland, to align with the Community Safety and Strengthening Act (CSSA) and to fulfill the requirements of the MOU between the Johns Hopkins University and the Baltimore Police Department. The Hopkins community and our neighbors throughout Baltimore can help improve and strengthen these directives further through their feedback and input.

Material that was considered in the drafting of the Directive and Procedure Manual, include:

**a. Publicly available policies from municipal police departments that have undergone substantial reform efforts**, including: the New Orleans Police Department; Seattle Police Department; Portland Police Department; Detroit Police Department; Ferguson Police Department; and Baltimore Police Department;

**b. National guidance on best practices and model policies from criminal justice reform efforts, social science research centers, and civil rights organizations**, including: the Leadership Conference on Civil and Human Rights; American Civil Liberties Union (ACLU), including the ACLU of Massachusetts's "Racially Just Policing: Model Policies for Colleges and Universities"; the International Association of Chiefs of Police (IACP); the Police Executive Research Forum (PERF); U.S. Department of Justice Office of Community Oriented Policing Services (COPS Office); The Justice Collaboratory (The JC) at Yale University Law School; and The Center for Innovation in Community Safety (CICS) at Georgetown Law School.

**c. National and local higher education institutions that are based in comparable environments and make policies publicly available**, including: Carnegie Mellon University; Morgan State University; Towson University; University of Chicago; University of Cincinnati; University of Maryland, Baltimore County; University of Pennsylvania; and Yale University.

To ensure that the proposed directives captured national best practices in community-focused public safety services, the development team collaborated with independent experts from two organizations: National Policing Institute (the Institute), a non-profit dedicated to advancing excellence in policing through research and innovation, and 21CP Solutions, an expert consulting team of former law enforcement personnel, academics, civil rights lawyers, and community leaders dedicated to advancing safe, fair, equitable, and inclusive public safety solutions. Each directive was reviewed by experts selected by both organizations, who provided feedback, suggestions, and edits that were fully incorporated into the current draft.

Finally, individuals and organizations representing the diversity of the Johns Hopkins University community provided feedback to ensure the policies and procedures reflect and respond to the values of our institution and to our community's public safety service needs.

Now they are available for your review. Johns Hopkins is committed to adopting, incorporating, or otherwise reflecting recommended changes and feedback in the final version of policies so long as feedback is aligned with our values and commitments, permissible within legal parameters, and supported by national best practices for community policing and public safety.



**POLICE DEPARTMENT**

**INTERACTIONS WITH  
LGBTQ+  
INDIVIDUALS**

**CONDUCT &  
RESPONSIBILITY #107**

Responsible Executive:  
Chief of Police  
Responsible Office:  
Vice President for Public Safety  
Approved by:  
Dr. Branville G. Bard, Jr.  
Issued: [full date]  
Revised: [full date]

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**Policy Statement**

The Johns Hopkins Police Department (JHPD) understands the importance of acknowledging and respecting a person’s sexual orientation, gender identity, and gender expression. Discrimination on the basis of gender identity, gender expression, or sexual orientation is illegal.

**Who is Governed by this Policy**

All personnel, including sworn, non-sworn, and contractual or voluntary persons in service with the JHPD are governed by this Directive.

**Purpose**

The purpose of this directive is to provide JHPD personnel with procedures to appropriately and respectfully interact with members of the Lesbian, Gay, Bisexual, Transgender, and Queer community.

## Definitions<sup>1</sup>

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<b>Affirmed /Chosen Name:</b>	A name that is different from a person’s Legal Name and is used consistently in place of the Legal Name. Also known as a preferred, affirmed, or lived name. (See <a href="#">(OPS012) Chosen Name</a> )
<b>Cisgender:</b>	A term used to refer to an individual whose gender identity aligns with the one associated with the sex assigned to them at birth. The prefix cis- comes from the Latin word for “on the same side as.” People who are both cisgender and heterosexual are sometimes referred to as cishet (pronounced “cis-het”) individuals. The term cisgender is not a slur. People who are not trans should avoid calling themselves “normal” and instead refer to themselves as cisgender or cis.
<b>Cisnormativity:</b>	The assumption that everyone is cisgender and that being cisgender is superior to all other genders. This includes the often implicitly held idea that being cisgender is the norm and that other genders are “different” or “abnormal.”
<b>Deadnaming:</b>	Occurs when an individual, intentionally or not, refers to the name that a transgender or gender-expansive individual used at a different time in their life. Avoid this practice, as it can cause trauma, stress, embarrassment, and even danger. Some may prefer the terms birth name, given name, or old name.
<b>Gender:</b>	Broadly, gender is a set of socially constructed roles, behaviors, activities, and attributes that a given society considers appropriate.
<b>Gender Expansive:</b>	An umbrella term sometimes used to describe people who expand notions of gender expression and identity beyond perceived or expected societal gender norms. Some gender-expansive individuals identify as a mix of genders, some identify more binarily as a man or a woman, and some identify as no gender. Gender-expansive people might feel that they exist among genders, as on a spectrum, or beyond the notion of the man/woman binary paradigm. Sometimes gender-expansive people use gender-neutral pronouns, but people can exist as any gender while using any pronouns. They may or may not be comfortable with their bodies as they are, regardless of how they express their gender.
<b>Gender Expression:</b>	The manner in which a person communicates about gender to others through external means such as clothing, appearance, or

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<sup>1</sup> Terms and Definitions in this Directive are adopted from the National Institute of Health’s Office of Equity, Diversity and Inclusion, Sexual & Gender Minority Employment Portfolio, terms and definitions, with internal cross references omitted, available at: <https://www.edi.nih.gov/people/sep/lgbti/safezone/terminology>, with the exception of Affirmed/Chosen Name and Legal Name, which are adopted from JHU’s Chosen Name Policy.

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mannerisms. This communication may be conscious or subconscious and may or may not reflect their gender identity or sexual orientation. While most people’s understandings of gender expressions relate to masculinity and femininity, there are countless combinations that may incorporate both masculine and feminine expressions—or neither—through androgynous expressions. An individual’s gender expression does not automatically imply one’s gender identity. All people have gender expressions

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**Gender Identity:**

A person’s deeply held core sense of self in relation to gender. Gender identity does not always correspond to biological sex. People become aware of their gender identity at many different stages of life, from as early as 18 months and into adulthood.

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**Gender Non-Conforming:**

A term for those who do not follow gender stereotypes. Often an umbrella for nonbinary genders. Though fairly uncommon, some people view the term as derogatory, so they may use other terms including gender expansive, differently gendered, gender creative, gender variant, genderqueer, nonbinary, agender, genderfluid, gender neutral, bigender, androgynous, or gender diverse. It is important to respect and use the terms people use for themselves, regardless of any prior associations or ideas about those terms.

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**Intersex:**

Intersex is the current term used to refer to people who are biologically between the medically expected definitions of male and female. This can be through variations in hormones, chromosomes, internal or external genitalia, or any combination of any or all primary and/or secondary sex characteristics. While many intersex people are noticed as intersex at birth, many are not. As intersex is about biological sex, it is distinct from gender identity and sexual orientation. An intersex person can be of any gender identity and can also be of any sexual orientation and any romantic orientation. The Intersex Society of North America opposes the practice of genital mutilation on infants and children who are intersex. Formerly, the medical terms hermaphrodite and pseudohermaphrodite were used; these terms are now considered neither acceptable nor scientifically accurate.

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**Legal Name:**

A U.S.-born person’s Legal Name is the name shown on their U.S. birth certificate, government identification, or other legal documents, unless the person’s name has changed based on certain events, such as a marriage or a valid court order. For foreign nationals who are not U.S. citizens, the “Legal Name” is the name that is entered in the Machine-Readable Zone (“MRZ”) of a passport. (See [\(OPS012\) Chosen Name](#))

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**LGBTQ+:**

An acronym that collectively refers to individuals who are lesbian, gay, bisexual, transgender, or queer, sometimes stated as LGBT (lesbian, gay, bisexual, and transgender) or, historically, GLBT (gay, lesbian, bisexual, and transgender). The addition of the Q for queer is a more recently preferred version of the acronym as cultural opinions of the term queer focus increasingly on its positive, reclaimed definition. The Q can also stand for questioning, referring to those who are still exploring their own sexuality and/or gender. The “+” represents those who are part of the community, but for whom LGBTQ does not accurately capture or reflect their identity.

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**Misgender:**

To refer to someone using a word, especially a pronoun or form of address, which does not correctly reflect their gender. This may be unintentional and without ill intent or can be a maliciously employed expression of bias. Regardless of intent, misgendering has a harmful impact.

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**Nonbinary/ Gender Fluid:**

Refers to people who do not subscribe to the gender binary. They might exist between or beyond the man-woman binary. Some use the term exclusively, while others may use it interchangeably with terms like genderqueer, genderfluid, gender nonconforming, gender diverse, or gender expansive. It can also be combined with other descriptors e.g., nonbinary woman or transmasc nonbinary. Language is imperfect, so it’s important to trust and respect the words that nonbinary people use to describe their genders and experiences. Nonbinary people may understand their identity as falling under the transgender umbrella and may thus be transgender as well. Sometimes abbreviated as NB or Enby, the term NB has historically been used to mean non-Black, so those referring to non-binary people should avoid using NB.

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**Sex Assigned at Birth or assigned Sex:**

The sex assigned to an infant at birth based on the child’s visible sex organs, including genitalia and other physical characteristics.

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**Sexual Orientation:**

Emotional, romantic, or sexual feelings toward other people or no people. While sexual activity involves the choices one makes regarding behavior, one’s sexual activity does not define one’s sexual orientation. Sexual orientation is part of the human condition, and all people have one. Typically, it is attraction that helps determine orientation. It also may refer to a person’s choice of whether or not to engage in sexual relationships and practices.

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**Transgender:**

Often shortened to trans, from the Latin prefix for “on a different side as.” A term describing a person’s gender identity that does not necessarily match their assigned sex at birth. Transgender people

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may or may not decide to alter their bodies hormonally and/or surgically to match their gender identity. This word is also used as an umbrella term to describe groups of people who transcend conventional expectations of gender identity or expression—such groups include, but are not limited to, people who identify as transsexual, genderqueer, gender variant, gender diverse, and androgynous. Trans is often considered more inclusive than transgender because it includes transgender, transsexual, transmasculine, transfeminine, and those who simply use the word trans.

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**Transition:**

A term used to refer to the process—social, legal, and/or medical—one goes through to affirm one’s gender identity. This may, but does not always, include taking hormones; having surgeries; and changing names, pronouns, identification documents, and more. Many individuals choose not to or are unable to transition for a wide range of reasons both within and beyond their control. The validity of an individual’s gender identity does not depend on any social, legal, and/or medical transition; the self-identification itself is what validates the gender identity.

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## Policy

It is the policy of the JHPD not to discriminate against anyone based on actual or perceived gender identity, gender expression, or sexual orientation in the performance of law enforcement duties or the delivery of police services. All members of the JHPD will interact with all members of the public, including LGBTQ+ individuals, in an affirming, respectful, and professional manner, and shall treat all individuals equally regardless of gender identity, gender expression, or sexual orientation. Members of the JHPD shall dedicate themselves to preserving life, maintaining human rights, and treating all people with compassion and respect. This Directive should be read in conjunction with JHPD Directive #106, Fair & Impartial Policing. (Commission on Accreditation for Law Enforcement Agencies (CALEA) 1.2.9)

## Procedures

The JHPD recognizes the need to earn trust in the LGBTQ+ community is essential, establishing the following procedures to help our members with advancing community trust, confidence and public safety.

### I. Culturally-aware Language

- A. The language used in reference to, and by, members of the LGBTQ+ community is ever-evolving. However, there are some terms which may have been used in the past that are now outdated, and often considered to be offensive, and should be avoided. The below table lists some of these terms but is not exhaustive. An appropriate approach is to ask the person if it is acceptable to mirror the language used by the individual to describe themselves.



<b>Avoid Using</b>	<b>Use Instead</b>
Hermaphrodite	Intersex
Transvestite	Cross-dresser
Transsexualism / Transgenderism	None – these terms are no longer appropriate to use
Sex change	Transition Gender-affirming (conforming) surgery / treatment  Note: There are many different types of gender-affirming interventions. There is no such thing as “the” surgery (which is inappropriate terminology that is only referencing genital gender-affirming surgery)
Sexual Preference	Sexual Orientation
Homosexual	Gay or Lesbian
Homosexual / Gay/ Alternative / Alternate / Transgender Lifestyle	None – there are no such things as any of these (e.g. - “Gay Lifestyle”)

- B. The term transgender is an adjective; it is not a noun or a verb. It is appropriate to say “transgender people,” but saying “some transgenders” would often be viewed as disrespectful. Further, no one is “transgendering;” an appropriate term would be transitioning.
- C. Terms like “sexual preference” or “gay/transgender/alternate/alternative lifestyle” should not be used. This language is a reflection of cisnormativity and is designed to reinforce the notion that having a sexual orientation that differs from being straight or a gender identity different than being cisgender was a “choice.”

## **II. Equal Treatment**

- A. Members of the JHPD shall interact with LGBTQ+ people in an unbiased, fair, and respectful manner.
- B. All requests for service or complaints generated by or involving LGBTQ+ individuals shall be investigated with diligence and vigor in accordance with departmental policies.

### **III. Discrimination Prohibited**

- A. The JHPD prohibits harassment or discrimination based on gender identity, gender expression, or sexual orientation.
- B. Members shall not use gender identity, gender expression, or sexual orientation in exercising discretion to stop, detention, search, seizure, or contact with any person, except as part of an actual and apparently credible description of a specific suspect, victim, or witness in any criminal investigation.
  - Members shall recognize that gender identity, gender expression, or sexual orientation do not constitute reasonable suspicion, probable cause, or evidence that a person has engaged in any crime.
  - In addition, members shall recognize that a person's gender identity or sexual orientation is not a physically observable trait, like facial hair or eye color, and cannot be part of a reliable and trustworthy physical description of a specific suspect.
- C. No member of the JHPD shall fail to respond to a call for service or a complaint on the basis of the actual or perceived gender identity, gender expression, and/or sexual orientation of the caller or complainant.
- D. Members shall not ask any person questions about their anatomy, gender expression, medical history, or sexual practices unless directly relevant to a criminal investigation.
- E. Members should not make assumptions about a person's sexual orientation or gender identity.
- F. Except when legally necessary, (e.g., processing an arrest), members shall not either require proof of a person's gender or question an individual's gender identity or gender expression.
- G. Members shall comply with JHPD Directive #103, Rules of Conduct, and JHPD Directive #106, Fair & Impartial Policing.

### **IV. Name Usage, Forms of Address, Gender Identity**

- A. Acknowledging a person's gender identity:
  - Members may need to ask a person what their gender identity is to complete a police report, evaluate a bias crime, or for another official purpose.
  - When a member needs to determine a person's gender identity, if the member is uncertain, they shall respectfully ask the person how they

identify in terms of gender. For example, “How do you describe your gender identity?” (If the person uses an unfamiliar term, it is reasonable to ask, “I am not familiar with that term, what does it mean to you?”). If one asks about pronouns, simply ask, “What are your pronouns?” (Do not phrase the question as “What are your preferred pronouns?” or “what pronouns do you prefer?”)

**B. Names and Pronouns** - Members shall not intentionally deadname, use their legal name, or misgender any person after that person has made their chosen name and/or pronouns known to the member.

- Members shall address people using names and pronouns expressed or requested by the person.
  - o This requirement does not preclude members from investigating whether a person is giving false information to a police officer.
- Where possible, members should avoid gendered pronouns, should omit using Sir/Mr. or Ma’am/Ms., and should use gender-neutral pronouns such as “they” or “them.”
  - o Examples of gender-neutral language members may use include “You need to step back, please.” Or “Folks, please step back.”
- Members shall not use derogatory or dehumanizing language.
- Members should be aware that peoples’ names may change over time, whether due to marriage, changes in gender identity, or other factors, and should address people by the name they currently use. Members should also be aware that changing one’s identification documents to match their gender identity may be very difficult, and that those documents must not be used to determine one’s gender identity.
- If a member mistakenly misgenders a person, they should apologize, move on, and use correct pronouns going forward.

## **V. Department Forms and Records**

- A.** Members shall complete paperwork using a person’s legal name and sex as stated on any legal or government-issued identification.
- If a member has a need to determine an individual’s legal name, they should ideally ask for this information one-on-one rather than in the presence of bystanders or witnesses.
- B.** If a person’s provided name or gender identity varies from their legal name or sex as stated on government-issued identification, members shall record the person’s provided name, their gender identity, and/or pronouns in the report narrative.

- For example: “Provided name Sally, transgender woman, uses she/her pronouns” or “Provided name August, uses they/them.”
- C. Some government-issued identification cards (including Maryland’s) have sex identifier options such as X for nonbinary, in addition to female and male options.
- X is not a recognized sex identifier under federal reporting requirements. Accordingly, for some forms the only options are female, male, and unknown. For federal reporting, the “X” sex identifier will be reported as “unknown.”

## **VI. Search, Seizure, Arrest, and Transport**

In addition to those procedures identified in JHPD Directive #412, Custody, Transport & Processing, members of the JHPD shall adhere to the following guidance:

### **A. Search and Seizure**

- Absent exigent circumstances, if any person to be searched requests that a member of a particular gender conduct the search, the member should accommodate the request. The person’s request shall be documented.
  - If the officer intends not to accommodate the person’s request or the officer has concerns about conducting the search or pat down, they should contact their supervisor for instructions as to how to proceed. If the request was not accommodated, the member shall memorialize the reason that the preference was not honored on their Body Worn Camera (BWC).
- Members shall not conduct a weapon pat down or search any person to determine that person’s gender identity or sex, or to view or touch the person’s genitals, or for any demeaning or harassing purpose.
- Members shall adhere to JHPD Directive #409, Field Interviews, Investigative Stops & Pat-Downs and #411, Search & Seizure.
- Members shall not perform a more or less invasive search or weapons pat down of a person based on that person’s gender identity.
- Certain items – such as prosthetics, clothing, wigs, chest binders, and cosmetic items – may be central to a person’s gender identity and gender expression. Thus, requests to remove identity-related items (for searches and/or arrests) shall be consistent with requirements for similar items for cisgender individuals and shall not be removed unless required for law enforcement purposes. Whenever practicable, removal of these items shall be conducted in private.

- o Example: If an officer would not request the removal of a wig or a bra by a cisgender woman, then the member shall not request the removal of a wig or a bra by a transgender woman.
- A person's possession of needles may be indicative of a prescribed hormone replacement therapy and is not necessarily indicative of drug use or illegal drug paraphernalia.
- Members shall not use the possession or presence of condoms as a basis or component of a reasonable suspicion or probable cause determination for a prostitution or sex-related offense. Members will not seize unused condoms except when they are evidence in a criminal investigation.

#### **B. Arrest and Transport**

- Members shall adhere to JHPD Directive #412, Custody, Transport & Processing.
- When making decisions about transport and custody of a person, members shall deem an individual's gender to be male or female based on the individual's gender identity. As such, transgender and/or intersex persons shall be transported with other arrestees of the same gender identity, unless the individual expresses a safety concern or a member identifies a safety concern, in which case the person shall be transported alone. For a person who states that they are nonbinary, gender fluid or gender non-conforming, the member shall ask the person if they would be more comfortable being transported with males or females.
- If a member is aware that a person is transgender, the member shall verbally inform the following individual who will be taking custody of the person, whether that is a Baltimore Police Department (BPD) member or an intake specialist at the Baltimore Central Booking and Intake Center.

### **VII. Medical Treatment**

- A. Members shall treat prescription hormones like any other medication necessary for a person's health and wellbeing.
- B. Members shall handle requests for medical attention by LGBTQ+ persons with the same urgency and respect as requests by all other persons.

### **VIII. Restroom Use**

- A. Members shall not stop, question, or arrest a person for using a single-sex restroom based to any extent or degree on the person's actual or perceived gender identity, gender expression or sexual orientation. Under Maryland law, refusing access to public accommodations, like restrooms, constitutes discrimination.

- If a member perceives that a person is using a single-sex restroom that is not consistent with the person's gender expression, the member shall not consider that factor, to any extent or degree, in deciding to take law enforcement action against the person. A member may, however, take law enforcement action against the person based on personal knowledge or reliable and trustworthy information that establishes reasonable suspicion or probable cause that the person is or has engaged in criminal activity.
- B.** While in JHPD custody, transgender, intersex, and gender non-conforming individuals shall be allowed to use the restroom in accordance with their gender identity. If, however, an individual has safety concerns with using the restroom, that individual may use the restroom they feel will be safest for them.

## **IX. Youth**

- A.** Members shall adhere to JHPD Directive #426, Interactions with Youth.
- B.** Members shall not disclose a youth's actual or perceived gender identity, gender expression, or sexual orientation to the youth's parents or guardians without the youth's consent unless it directly pertains to the case.
- C.** Members should be aware that disclosing this information to parents or guardians may put the youth at increased risk for violence or rejection in the home.

## **X. Release of Information to the Media**

- A.** JHPD media releases shall refer to transgender persons using their provided name and pronouns that reflect their gender identity.
- B.** If gender identity is unknown and/or cannot be confirmed, the Department will use gender-neutral pronouns such as "they" or "them."
- C.** JHPD will not intentionally deadname or misgender transgender people in media releases, but sometimes may list multiple names for clarity, public interest, or investigatory purposes.

## **XI. Training**

JHPD shall provide introductory and ongoing training to all members on this Directive and related material that covers the dimensions of gender identity, gender expression, and sexual orientation that are relevant to law enforcement practices.

## Policy Enforcement

<b>Enforcement</b>	Police Department managers and supervisors are responsible for enforcing this Directive.
<b>Reporting Violations</b>	Suspected violations of this Directive should be reported to the Public Safety Accountability Unit.

## Related Resources

<b>University Policies and Documents</b>
<p>Conduct &amp; Responsibility #103, Rules of Conduct</p> <p>Conduct &amp; Responsibility #106, Fair &amp; Impartial Policing</p> <p>Operational Procedure #409, Field Interviews, Investigative Stops &amp; Pat-Downs</p> <p>Operational Procedure #411, Search &amp; Seizure</p> <p>Operational Procedure #412, Custody, Transport &amp; Processing</p> <p>Operational Procedure #426, Interactions with Youth</p>
<b>External Documentation</b>
<b>Police Department Forms and Systems</b>

## Contacts

<b>Subject Matter</b>	<b>Office Name</b>	<b>Telephone Number</b>	<b>E-mail/Web Address</b>
Policy Clarification and Interpretation			