



## Cover Memorandum

### Parking Enforcement, JHPD Directive #447

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

The purpose of this Directive is to provide Johns Hopkins Police Department (JHPD) officers with guidelines for enforcing parking laws and issuing citations for parking violations.

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

Although JHPD officers are authorized to issue citations for parking violations within its jurisdictional area, the Johns Hopkins University (JHU) Transportation Services retains the primary responsibility for enforcing parking regulations. JHPD's role in parking enforcement is focused primarily on areas where infractions may pose safety hazards or impede traffic flow. Consistent with this goal, the Directive states that JHPD officers may issue parking citations for parking: in fire lanes or within 15 feet of fire hydrants; in a manner that interferes with the passage of emergency vehicles; in handicapped spaces or access areas; in roadways, crosswalks, sidewalks, or at bus stops; in construction areas or areas that have been closed by barricades; in a manner that violates any provision of the Maryland Code of Transportation regulations against stopping, standing, and parking; and in other listed ways that create safety hazards, interfere with the use of JHU facilities, or hinder the free movement of traffic. The Directive states that all other University parking violations are of secondary importance in JHPD's parking enforcement responsibilities.

The Directive also provides guidance on the process for issuing parking citations. First and foremost, prior to issuing a citation for a parking violation, officers shall initially attempt to correct the violation. Only if and when efforts to correct the violation have been tried and failed, or are not reasonably feasible under the circumstances, may an officer consider issuing a parking citation. The Directive also describes the steps that officers and supervisors must take in order to ensure the management and control of citation books, how to complete and issue citations to drivers, and where to submit additional copies. When issuing citations, officers shall complete them accurately, legibly, and consistent with instructions and training provided by JHU's Transportation Services. Additionally, the Directive describes the process for appealing a parking citation pursuant to the Maryland Transportation Code.

Finally, the Directive states that JHPD vehicles must be parked in accordance with parking regulations, except in the limited situation when non-compliance may be necessary for reasons or conditions that include, but are not limited to, response to emergency calls; the need to have ready access to critical supplies, equipment, or transportation; or special event responsibilities. Pursuant to this Directive, members are responsible for parking citations received on personal or JHPD vehicles.

#### **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**

**PARKING  
ENFORCEMENT**

**OPERATIONAL  
PROCEDURE #447**

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**

Johns Hopkins University (JHU) Transportation Services has the primary responsibility for enforcing JHU parking regulations. However, all officers with the Johns Hopkins Police Department (JHPD) have authority to issue citations for parking violations as part of the agency’s overall traffic enforcement program. JHPD’s parking enforcement responsibilities are primarily focused on responding to violations that may pose a safety hazard or impede the flow of traffic, such as parking in a fire lane, too close to a fire hydrant, in a roadway, in construction areas, or in areas of campus closed off by barricades.

When enforcing parking laws, JHPD officers must act in accordance with the MD Code, Transportation, Title 26, Subtitle 3 (Parking Ordinances and Regulations), as well as JHPD Directive #442, Traffic Control & Enforcement, JHPD Directive #446, Vehicle Towing & Storage, and all other relevant JHPD directives and training.

## Who is Governed by this Policy

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

## Purpose

The purpose of this Directive is to provide JHPD officers with guidelines for enforcing parking laws and issuing citations for parking violations.

## Definitions

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<b>Member:</b>	All members of the JHPD, including employees, officers, and volunteers, unless the term is otherwise qualified (e.g., member of the public, member of the Baltimore Police Department, etc.).
<b>Officer:</b>	All sworn police officers, at any rank, as defined by MD Code, Public Safety, § 3-201, in service with the JHPD.

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## Policy

JHU is committed to enforcing parking laws fairly, equally, and in accordance with the Maryland Transportation Code. Although JHPD officers are authorized to issue citations for parking violations in order to promote safety and maintain orderly traffic operations, JHU's Transportation Services retains the primary responsibility for enforcing JHU parking regulations.

## Procedures

- I. JHPD Role** (Commission on Accreditation for Law Enforcement (CALEA) 61.1.2)
  - A.** JHU's Transportation Services has primary responsibility for enforcing JHU parking regulations.
  - B.** JHPD shall conduct limited parking enforcement activities only within JHPD's primary jurisdiction, as defined by state law and the Memorandum of Understanding (MOU) between JHPD and the Baltimore Police Department (BPD), dated December 2, 2022.
    - JHPD members shall not enforce JHU parking regulations outside of JHPD's primary jurisdiction.
  - C.** Parking enforcement is a component of JHPD's overall traffic enforcement program, as defined in JHPD Directive #442, Traffic Control & Enforcement. JHPD's role in parking enforcement is focused primarily on areas where infractions may pose safety hazards or impede traffic flow. Consistent with this goal, JHPD officers may issue parking citations for vehicles that are parked in the following locations, after first attempting to correct the violation as described in Section II.B of this Directive:
    - In fire lanes or within 15 feet of a fire hydrant,

- In a manner that interferes with the passage of emergency vehicles,
  - In handicapped spaces or access areas without displaying a valid, state-issued handicapped permit or license plate, or vehicles parked in an adjacent transfer area, with or without a valid handicapped permit,
  - In a roadway, on crosswalks, on sidewalks, or at bus stops,
  - On grass, tree plots, or where parking would mar the landscape, unless the vehicle is authorized to park in that location due to landscaping work being performed,
  - In construction areas,
  - In any area of campus that has been closed off by barricades or other traffic control devices,
  - In a manner that interferes with traffic during snow emergencies,
  - On hash marks or over painted parking control designations,
  - In any other manner that creates a safety hazard, interferes with the use of JHU facilities, or hinders the free movement of traffic, and
  - In a manner that violates any provision of MD Code, Transportation § 21-1001 – 1007.
- D.** All other JHU parking violations are of secondary importance in JHPD’s parking enforcement responsibilities.
- E.** When enforcing parking laws, JHPD officers are permitted to request vehicle towing services only as described in JHPD Directive #446, Vehicle Towing & Storage.
- JHU’s Transportation Services may request that officers assist with towing vehicles for parking violations.

## **II. Issuing Parking Citations**

- A.** JHPD officers are authorized to issue parking citations for violations described in Section I of this Directive that occur within JHPD’s primary jurisdiction. All citations shall be issued consistent with JHPD Directive #442, Traffic Control & Enforcement.
- B.** Prior to issuing a citation for a parking violation, officers shall initially attempt to correct the parking violation. Only if and when efforts to correct the violation have been tried and failed, or are not reasonably feasible under the circumstances, may an officer consider issuing a parking violation.
- For example, prior to issuing a citation for a parking violation, officers shall try to contact and locate the operator of the vehicle to have it moved into a legal parking spot. If the vehicle is not obstructing the free flow of

traffic or otherwise does not pose an immediate hazard as described in Section I of this Directive, a written warning should be issued in lieu of a citation. If the vehicle is illegally parked and causing an immediate hazard as described in Section I of this Directive, the owner should be contacted prior to issuing a citation and towing the vehicle.

- C.** JHU's Transportation Services issues citation books to the JHPD for use by officers. Officers shall:
- Account for all citations that are issued,
  - Obtain new citation books from the patrol supervisors' supply cabinet with the assistance of patrol supervisors,
  - Ensure they receive citation books in numerical order,
  - Ensure citation control registries are completed when signing out new books,
  - Immediately submit the parking citation book to their supervisor when all citations have been issued and/or account for, and request a new book,
  - Submit a detailed memorandum if their parking citation book is misplaced, stolen, or destroyed (The report must include an explanation and request for a replacement book), and
  - Turn in citations as requested and/or upon ending their employment with JHPD.
- D.** When issuing the citation, officers shall complete them accurately, legibly, and consistent with the Transportation Services instructions and training. Once completed:
- Officers shall deliver the citation to the driver or, if the vehicle is unattended, attach the citation to the vehicle in a conspicuous place (MD Code, Transportation § 26-302.),
  - A copy of the citation must be submitted to Central Records by the end of the officer's tour of duty on the day the citation was issued, and
  - In the event the officer makes an error on a written citation, the officer will follow the Transportation Services instructions for voiding the citation and making a correction.
- E.** Supervisors shall:
- Issue citation books in numerical sequence to employees,
  - Ensure sign-out logs and registries are completed, and
  - Ensure employees follow all required instructions for completing and submitting citations.

- F.** The Logistics Manager shall:
- Coordinate the process of retrieving unissued, obsolete citations from employees, and
  - Attempt to collect unissued citations from individuals who end their employment with JHPD.
- G.** Records Management personnel shall:
- Retain and file citation receipt cards, JHPD copies of all issued and voided citations, and JHPD's copies of citation void forms consistent with acceptable business practices and JHPD's retention and destruction schedule,
  - Send all completed and voided citation originals, appropriate copies, and void form originals to Transportation Services on a business-daily basis, and
  - Notify current and former employees of any parking enforcement-related summonses.

### **III. Appeals**

- A.** Persons may appeal a citation and elect to stand trial for the violation. Appeals of citations issued for the following violations shall be handled by the District Court:
- Parking in a Handicapped Area,
  - Prohibited parking in a fire lane, within 15 feet of a fire hydrant, in a roadway, on crosswalks, or at bus stops,
  - Violations of the MD Code, Transportation § 21-1001 – 1007, and
  - Violations of Baltimore City parking codes.
- B.** All other JHU violations may be appealed through the District Court or administratively through JHU's Transportation Services.
- C.** Persons appealing a violation through the District Court must give notice of the intent to appeal to JHPD at least five (5) days prior to the date of payment as set forth in the citation. MD Code, Courts and Judicial Proceedings § 7-302(d).
- Upon receiving notice of the intent to appeal, Records Management shall forward to the District Court a copy of the notice and a copy of the parking citation.
- D.** If the person making the appeal desires the presence at trial of the officer who issued the citation, the individual will notify JHPD at the time of submitting the notice of intent to appeal.
- If proper notice is not given, the officer need not appear at the trial, and



the copy of the citation bearing the certification of the officer is prima facie evidence of the facts stated therein. (MD Code, Transportation § 26-303(b))

**IV. Member Compliance with Parking Regulations**

- A. JHPD vehicles shall be parked consistent with parking regulations, except in the limited situation when noncompliance may be necessary for reasons or conditions that include, but are not limited to:
  - Response to emergency calls,
  - The need to have ready access to critical supplies, equipment, or transportation, or
  - Special event responsibilities.
- B. Members engaged in permissible noncompliance with parking regulations will minimize the impact on pedestrian and traffic flow or reasonably known or anticipated public safety matters.
- C. Members shall park their personal vehicles consistent with parking regulations.
- D. Members are responsible for parking citations received on personal or JHPD vehicles. However, this does not affect members’ rights to appeal citations through established channels.

**Policy Enforcement**

<b>Enforcement</b>	JHPD managers and supervisors are responsible for enforcing this Directive.
<b>Reporting Violations</b>	Suspected violations of this Directive should be reported to the Office of PSAU.

**Related Resources**

<b>University Policies and Documents</b>
Operational Procedure #442, Traffic Control & Enforcement Operational Procedure #446, Vehicle Towing & Storage
<b>External Documentation</b>
<a href="#">MD Code of Transportation, Title 26, Subtitle 3 - Parking Ordinances and Regulations</a> Baltimore Police Department, Policy 901, Parking Citations

Memorandum of Understanding Between the Johns Hopkins Police Department and the Police Department of Baltimore City, Coordination of Law Enforcement Duties.

**Police Department Forms and Systems**

<https://powerdms.com/ui/login>

## Contacts

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

DRAFT