



**Comments on behalf of the LGBT/HIV Criminal Justice Work
Group's Subgroup on Policing and Law Enforcement**

**“What is the cause of diminished respect for law enforcement and the laws
they enforce, and how does it affect both police and public safety?”**

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Law enforcement officers have historically, and in the recent past, been charged with enforcing unconstitutional laws against LGBTQ people,¹ and have discriminatorily enforced facially neutral laws.² Today, homophobia and transphobia remain a part of the culture in too many law enforcement agencies. LGBTQ people of color and transgender women of color face compounding discrimination due to race, gender, and gender identity. These experiences, outlined below, cause LGBTQ people to distrust the law enforcement officers they meet.

Over-policing: The LGBTQ community faces disparate levels of policing. Across the country, gay, lesbian, and bisexual youth are more likely to be stopped by the police and experience greater criminal justice sanctions not explained by greater involvement in violating the law or engaging in transgressive behavior.³ A national survey of LGBTQ people found that 73% of LGBTQ people and people living with HIV reported face-to-face contact with law enforcement in the past five years.⁴ In a 2012 report of LGBTQ communities of color in Jackson Heights, Queens, New York, 54% of LGBTQ respondents reported having experienced a police stop and 59% of transgender respondents reported that they had been stopped by police.⁵

Homophobia and Transphobia: Few police departments have policies governing their interactions with people who are LGBTQ or non-binary, and homophobia and transphobia are too common within police departments.⁶ Officers frequently misgender⁷ or make offensive comments to LGBTQ people in interactions. And even in departments that have policies for interactions with LGBTQ people, ongoing training and accountability are needed to ensure officers understand and comply with the policies.

Homophobia and transphobia within agencies leads to LGBTQ people of color, transgender people, and youth experiencing particularly high rates of harassment and discrimination by law enforcement.⁸ In a 2015 survey of transgender people throughout the United States, of respondents who had interacted with police in the prior year and believed the officer thought or knew they were transgender, 58% reported some form of mistreatment; 49% involved officers consistently using the wrong gender pronouns, 20% involved other verbal harassment, and 19% involved officers asking questions about gender transition.⁹ In a survey of sex workers in Baltimore, more than two-thirds (70%) of transgender

¹ In 2003, when the Supreme Court ruled that laws criminalizing sodomy were unconstitutional in *Lawrence v. Texas*, 539 U.S. 558 (2003), many states were enforcing anti-sodomy laws. A decade later, more than a dozen states still had not repealed the laws, refusing to do so to express continued moral disapproval of same-sex relationships. See Washington Blade, *Legal group calls for repeal of state sodomy laws* (2016) available at

<https://www.washingtonblade.com/2016/02/17/legal-group-calls-for-repeal-of-state-sodomy-laws/>

² See, e.g., *Calhoun v. Pennington*, No. 09-3286 (N.D. GA 2009) (alleging unlawful enforcement against patrons at gay bar)

³ Kathryn E. W. Himmelstein & Hannah Brückner, *Criminal-Justice and School Sanctions Against Non-heterosexual Youth: A National Longitudinal Study*, 127 *Pediatrics* (no. 1) 49-57 (2011).

⁴ Lambda Legal, *Protected and Served? Survey of LGBT/HIV Contact with Police, Courts, Prisons, and Security.* Preliminary Findings (2012), available at <https://www.lambdalegal.org/protected-and-served>

⁵ Make the Road New York, *Transgressive Policing: Police Abuse of LGBTQ Communities of Color in Jackson Heights*, 4 (2012), available at https://maketheroadny.org/pix_reports/MRNY_Transgressive_Policing_Full_Report_10.23.12B.pdf

⁶ National Center for Transgender Equality, *Failing to Protect and Serve: Police Department Policies Towards Transgender People*, available at https://transequality.org/sites/default/files/docs/resources/FTPS_FR_v3.pdf;

⁷ “Misgendering” is when a person uses pronouns that do not align with another person’s gender identity.

⁸ Christy Mallory, Amira Hasenbush & Brad Sears, *Discrimination and Harassment by Law Enforcement Officers in the LGBT Community*, Williams Institute (2015), available at <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Mallory-Sears-Govt-Contractors-Non-Discrim-Feb-2012.pdf>

⁹ Sandy E. James et al., *The Report of the 2015 U.S. Transgender Survey*, Nat’l Center for Transgender Equality, 186 (2016), available at <https://www.transequality.org/sites/default/files/docs/USTS-Full-Report-FINAL.PDF>

sex workers reported having been verbally or emotionally harassed by police and over half (56%) reported police had made transphobic remarks to them.¹⁰

Even in cases in which transgender people are victims of crime, law enforcement agencies misgender them in internal and news reports, alienating the victim's friends and family, increasing distrust with the very community whose cooperation law enforcement needs, and hampering their own ability to successfully resolve the investigation. In 2018 in Orange County, Florida, sheriff's deputies investigating the murder of Sasha Garden, a black transgender woman, intentionally misgendered her in initial police reports and refused to correct their initial report despite pleas from Ms. Garden's friends to do so.¹¹ Similarly, after the murders of three black transgender women, and the non-fatal shooting of a fourth transgender woman, in Jacksonville, Florida, the police department repeatedly refused to use their correct pronouns in reports to the media.¹² These intentional refusals to use the correct names and pronouns of victims of crime illustrate the overt and well-known hostility that reinforce a distrust of law enforcement by members of the LGBTQ community.

Profiling: LGBTQ people, particularly transgender women of color and LGBTQ youth of color, are persistently profiled by law enforcement as being engaged in sex work.¹³ A study by Human Rights Watch found that transgender women were subjected to constant harassment, verbal abuse, and stops for suspicion of prostitution regardless of whether they were engaging in sex work.¹⁴ For LGBTQ people, police stops "are often a result of profiling, targeting [people] for the way they look, what they are wearing, and where they are standing, rather than on the basis of any observed illegal activity."¹⁵ In a 2015 survey, of respondents who said they believed officers thought or knew they were transgender, 33% of Black transgender women and 30% of multiracial transgender women reported that an officer had assumed they were sex workers.¹⁶ Transgender women frequently report that police assume they are participating in sex work, simply because condoms are found during a frisk.¹⁷ Transgender people report being stopped and searched for condoms "while walking home from school, going to the grocery store, and waiting for the bus."¹⁸ Thus, every day activities become invitations for police stops and harassment, leading to disproportionate interactions with the criminal legal system and further abuse therein.

¹⁰ Katherine Footer et al., Police-Related Correlates of Client-Perpetrated Violence Among Female Sex Workers in Baltimore City, Maryland, 109 Am. J. Pub. (no. 2) 289-295 (2019).

¹¹ Colin Wolf and Monivette Cordeiro, A Transgender Woman Died Today and How It Was Reported Was Awful, Orlando Weekly (July 19, 2018), available at <https://www.orlandoweekly.com/Blogs/archives/2018/07/19/a-transgender-woman-died-in-orlando-today-and-how-it-was-reported-was-awful>.

¹² Lucas Waldron & Ken Schwencke, Deadnamed, ProPublica (Aug. 10, 2018), available at <https://www.propublica.org/article/deadnamed-transgender-black-women-murders-jacksonville-police-investigation>.

¹³ Stoudt, Fine, and Fox, "Growing Up Policed in the Age of Aggressive Policing Policies;" Himmelstein and Brückner, "Criminal-Justice and School Sanctions Against Nonheterosexual Youth;" See also, Mogul, Ritchie, and Whitlock, Queer (In)Justice: Make the Road New York, "Transgressive Policing: Police Abuse of LGBT Communities of Color in Jackson Heights" (New York: Make the Road, 2012), available at http://www.maketheroad.org/pix_reports/MRNY_Transgressive_Policing_Full_Report_10.23.12B.pdf.

¹⁴ Human Rights Watch, Sex Workers at Risk: Condoms as Evidence of Prostitution in Four U.S. Cities, (2012) available at http://www.hrw.org/sites/default/files/reports/us0712ForUpload_1.pdf

¹⁵ *Id.*

¹⁶ James, *supra* n.9 at 14.

¹⁷ Human Rights Watch, Sex Workers at Risk (2012) available at <https://www.hrw.org/report/2012/07/19/sex-workers-risk/condoms-evidence-prostitution-four-us-cities>

¹⁸ *Id.* at 2.

Sexual Violence: Although sexual assault is grossly underreported, sexual violence is the second most reported form of police misconduct, after use of force.¹⁹ In a survey of over 500 transgender D.C. residents, 23% of Black transgender people reported physical or sexual assaults by police.²⁰ A survey of LGBTQ youth in New Orleans found that 59% of transgender youth and 12% of non-transgender LGBQ youth surveyed had been asked for a sexual favor by New Orleans police.²¹ LGBT youth in a New York City survey were more than twice as likely to report negative sexual contact with police in the past six months, compared to non- LGBT youth.²² Among Latina transgender women in Los Angeles County, 24% reported having been sexually assaulted by law enforcement.²³ In a recent study of sex workers in Baltimore, more than half (62%) of transgender sex workers reported having been sexually harassed or assaulted by police, and nearly half (43%) reported police having been their “clients” in the past three months.²⁴

Failures to investigate or inadequate responses to reports of crime: In the 2015 U.S. Transgender Survey, 57% of respondents said they would feel uncomfortable asking the police for help if they needed it.²⁵ Yet, even when they do report crimes to law enforcement, many LGBTQ people report receiving an inadequate response. In a survey of LGBTQ and HIV+ individuals, HIV+ respondents and transfeminine respondents reported having experienced police neglect of physical assault at higher rates than other LGBTQ people.²⁶ Similarly, transgender people and people of color reported indifference or a lack of proper response to property crime (58% of transgender respondents, 59% of African-American respondents, 62% of Latina/o respondents, and 70% of Native American respondents).²⁷ This contributes to the distrust members of the LGBTQ community, particularly people of color, feel towards law enforcement.

Recommendations: The Commission should encourage law enforcement agencies to implement the recommendations in the DOJ Community Oriented Policing Services’ 2017 report, “Gender, Sexuality, and 21st Century Policing, Protecting the Rights of the LGBTQ+ Community” to decrease bias and discrimination experienced by LGBTQ people in interactions with law enforcement.

¹⁹ The Cato Institute, National Police Misconduct Reporting Project, (2010) available at leg.state.nv.us/Session/77th2013/Exhibits/Assembly/JUD/AJUD338L.pdf

²⁰ DC TransCoalition, Access Denied: Washington, D.C. Trans Needs Assessment Report (2015) available at <https://dctranscoalition.files.wordpress.com/2015/11/dctc-access-denied-final.pdf>

²¹ BreakOUT!, We Deserve Better: A Report on Policing in New Orleans By and For Queer and Trans Youth of Color, (2014) available at <https://static1.squarespace.com/static/58ba8c479f7456dff8fb4e29/t/5ad61be22b6a2806771bb448/1523981349224/WE+DESERVE+BETTER+REPORT.pdf>

²² Brett G. Stoudt, Michelle Fine & Madeline Fox, Growing Up Policed in the Age of Aggressive Policing Policies 56 N.Y.L. Sch. L. Rev. 1331 (2011) available at <http://www.nylslawreview.com/wp-content/uploads/sites/16/2012/04/56-4.Growing-up-Policed-in-the-Age-of-Aggressive-Policing-Policies.Stoudt-Fine-Fox.pdf>

²³ Frank Galvan & Mosen Bazargan, Interactions of Latina Transgender Women with Law Enforcement (2012), available at <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Galvan-Bazargan-Interactions-April-2012.pdf>

²⁴ Footer, supra n.10.

²⁵ James, supra n.9 at 14.

²⁶ Lambda Legal, “Protected & Served,” <https://www.lambdalegal.org/protected-and-served/police#2a> (finding 73% of HIV+ personal assault victims and 70% of transfeminine respondents say they experienced police neglect of their physical assault complaint, compared to 59% of HIV-negative physical assault victims and 60% percent of cisgender (non-transgender or gender nonconforming (TGNC)) assault victims.

²⁷ *Id.*



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**“How do certain social ills such as mental illness, substance abuse, and
homelessness affect the ability of law enforcement to police?”**

**Whit Washington, Esq
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Across the country, local and state governments, and the federal government have failed to invest in the necessary infrastructure and services for people with mental and behavioral health disabilities, as well as those experiencing extreme poverty who are housing unstable or homeless. The consequences of insufficient health care and housing have led to police involvement in incidents where officers' tools (mainly arrest and incarceration) are inappropriate to address the underlying issues. Local and state governments must improve community-based and city services for people experiencing mental and behavioral health disabilities, and those experiencing poverty, to prevent unnecessary, and sometimes lethal, interactions with law enforcement officers.

Mental or behavioral health disabilities: LGBTQ individuals who experience discrimination have a higher prevalence of psychiatric disorders, psychological distress, depression, loneliness, and low self-esteem.”¹ When states cut mental health services, law enforcement is tasked with addressing situations where individuals are in crisis.² Unfortunately, many law enforcement agencies are not equipped to handle mental health emergencies-- in 2018 alone of the 987 people fatally shot by police, about 25% had a mental or behavioral health disability.³

Poverty: Discrimination that LGBTQ youth face in their homes, schools, and in public can negatively affect their earning power as an adult. From an early age, LGBT youth have a higher incidence of predictors of future economic insecurity. ⁴ LGBTQ youth are more likely to be expelled or face other disciplinary measures while still in school.⁵ The 2013 National School Climate Survey found that three-quarters (75%) of transgender middle and high school students felt unsafe at school because of how they expressed

¹ Ilan H. Meyer, *Experiences of Discrimination among Lesbian, Gay and Bisexual People in the US* (Williams Institute, UCLA School of Law, 2019), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/LGB-Discrimination-Work.pdf>; Jennifer C. Pizer et al., Evidence of Persistent and Pervasive Workplace Discrimination Against LGBT People: The Need for Federal Legislation Prohibiting Discrimination and Providing for Equal Employment Benefits, 45 *Loy. L.A. L. Rev.* 715, 721 (2012).

² David Cloud and Chelsea Davis, “First Do No Harm: Advancing Public Health in Policing Practices,” New York, NY: First Do No Harm, 2015, <http://www.vera.org/sites/default/files/resources/downloads/public-health-and-policing.pdf>

³ Washington Data Base of Police Shootings 2018. *Washington Post* Report https://www.washingtonpost.com/graphics/2018/national/police-shootings-2018/?utm_term=.def6b0fc2b38

⁴ Detlaff, A., Washburn, M., Carr, C., & Vogel, A. (2018). Lesbian, gay, and bisexual (LGB) youth within in welfare: Prevalence, risk and outcomes. *Child abuse & neglect.* 80. 183-193 (finding they are overrepresented in the child welfare system)10.1016/j.chiabu.2018.03.009. 8; “Sexual and gender minority youth in foster care: Assessing disproportionality and disparities in Los Angeles.” (finding they are overrepresented in foster care)Los Angeles, CA: The Williams Institute, UCLA School of Law

⁵ Joseph G. Kosciw et al., “The 2013 National School Climate Survey: The Experiences of Lesbian, Gay, Bisexual and Transgender Youth in Our Nation’s Schools” (New York: GLSEN, 2014), https://www.glsen.org/sites/default/files/2013%20National%20School%20Climate%20Survey%20Full%20Report_0.pdf; see also NAACP Legal Defense and Educational Fund, “School to Prison Pipeline,” accessed July 6, 2015, <http://www.naacpldf.org/case/school-prison-pipeline>; Amnesty International, “United States of America: Stonewalled: Police Abuse and Misconduct against Lesbian, Gay, Bisexual and People in the U.S.,” September 2005, <https://www.amnesty.org/en/documents/AMR51/122/2005/en>.

their gender,⁶ and the same study found that hostile or unsupportive school environments caused LGBTQ youth to drop out of school.⁷ As adults, LGBTQ people face pervasive discrimination when seeking employment, and thus, are far more likely to experience poverty than the general population.⁸ LGBTQ people have a poverty rate of 21.6% compared to 15.7% for cisgender heterosexual people.⁹ Individuals who experience higher incidences of poverty, are more likely to encounter the criminal justice system. In a recent study, transgender individuals who had extremely low incomes of \$10,000 or less a year were 50% more likely to have been incarcerated at some point in their lives.¹⁰

Homelessness: For LGBTQ youth, family rejection of young people's sexual orientation or gender identity is a primary driver of homelessness.¹¹ In a 2014 survey of homeless youth providers, of the respondents' clients, 20% identified as gay or lesbian, 7% identified as bisexual, and 2% identified as questioning their sexuality.¹² LGBTQ people in the United States also experience disproportionate rates of homelessness because of the barriers they face when trying to access employment.¹³ Arrests of people who are homeless for low-level crimes make it more difficult for them to gain employment in the future and are thus counterproductive. Law enforcement agencies should identify and use alternatives to incarceration where possible for low-level crimes.

⁶ Joseph G. Kosciw et al., "The 2013 National School Climate Survey: The Experiences of Lesbian, Gay, Bisexual and Transgender Youth in Our Nation's Schools" (New York: GLSEN, 2014), https://www.glsen.org/sites/default/files/2013%20National%20School%20Climate%20Survey%20Full%20Report_0.pdf.

⁷ *Id.*

⁸ Ilan H. Meyer, *Experiences of Discrimination among Lesbian, Gay and Bisexual People in the US* (Williams Institute, UCLA School of Law, 2019), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/LGB-Discrimination-Work.pdf>; Jennifer C. Pizer et al., *Evidence of Persistent and Pervasive Workplace Discrimination Against LGBT People: The Need for Federal Legislation Prohibiting Discrimination and Providing for Equal Employment Benefits*, 45 Loy. L.A. L. Rev. 715, 721 (2012).

⁹ M. V. Lee Badgett Soon Kyu Choi Bianca D.M. Wilson (2019). "LGBT Poverty in the United States: A study of differences between sexual orientation and gender identity groups." Los Angeles, CA: The Williams Institute available at

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¹⁰ Jaime M. Grant et al., "Injustice at Every Turn: A Report of the National Transgender Discrimination Survey" (Washington: National Center for Transgender Equality and National Gay and Lesbian Task Force, 2011), http://www.thetaskforce.org/static_html/downloads/reports/reports/ntds_full.pdf.

¹¹ S.K Choi et al., *Serving Our Youth 2015: The Needs and Experiences of Lesbian, Gay, Bisexual, Transgender, and Questioning Youth Experiencing Homelessness* at 5 (June 2015), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Serving-Our-Youth-June-2015.pdf>

¹² S.K Choi et al., *Serving Our Youth 2015: The Needs and Experiences of Lesbian, Gay, Bisexual, Transgender, and Questioning Youth Experiencing Homelessness* at 5 (June 2015), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Serving-Our-Youth-June-2015.pdf>. At 4

¹³ Sandy E. James et al., *The Report of the 2015 U.S. Transgender Survey*, Nat'l Ctr. for Transgender Equality at 6, 147 (Dec. 2016),

<https://transequality.org/sites/default/files/docs/usts/USTS-Full-Report-Dec17.pdf> (hereinafter "2015 U.S. Transgender Survey") (revealing that 30% of respondents experienced homelessness, and the rate was nearly twice as high among those who lost their job because of their gender identity or expression and transgender women of color); see also *Paying an Unfair Price; Bias in the Workplace*.

Drug use: Law enforcement currently enforces an abstinence only response to drug use. Such tactics exclude from helpful programs people interested in reducing, but not eliminating, their use.¹⁴ However, studies have shown that a harm reduction model, implementing social services that reduce harm related to drug use, are successful in decreasing mortality, both from natural causes and from overdoses.¹⁵ The response to drug use should focus on community approaches to harm reduction instead of policing drug use.

Social Services: A lack of services perpetuates the cycle of poverty which results in the overrepresentation of LGBTQ people in the criminal justice system. Community-based and city services must be expanded to support people with mental and behavioral health disabilities. For example, the City of Baltimore recently conducted a gap analysis of its public health system.¹⁶ Cities and counties should conduct similar analyses and address the shortages identified.

Social services aimed at addressing the needs of LGBTQ people so that they do not end up in the criminal justice system often discriminate against them, leaving LGBTQ people without access to those services. For example, nearly half (48%) of low-income LGBT and gender non-conforming people in New York City reported discrimination by a government or county agency when seeking public benefits, such as food or housing assistance, and many were turned away.¹⁷ In the National Transgender Discrimination Survey, 22% of respondents had been denied equal treatment by government agency personnel and 22% had been harassed or disrespected.¹⁸ Failing to adequately address anti-LGBTQ discrimination in social services may result in LGBTQ individuals being forced into poverty, which then is over policed and thus creates an additional burden for law enforcement. Services must be available to all people without barriers due to bias.

By working with advocates, community members and leaders, and with government at all levels, to improve community-based supports and services, law enforcement agencies can decrease the burden on officers to address issues that are better addressed by community-based or city services. At the same time, they will decrease the pain and costs of overrepresentation of LGBTQ people in the criminal justice system.

¹⁴ Harm reduction: An approach to reducing risky health behaviours in adolescents, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2528824/>

¹⁵ Langendam MW, van Brussel GH, Coutinho RA, van Ameijden EJ. The impact of harm-reduction-based methadone treatment on mortality among heroin users. *Am J Public Health.* 2001;91:774–80.

¹⁶ See Baltimore Public Health System Gap Analysis, available at <https://www.baltimorepolice.org/baltimore-public-health-system-gap-analysis>.

¹⁷ Dwayne Bibb et al., “A Fabulous Attitude: Low-Income LGBTGNC People Surviving & Thriving with Love, Shelter & Knowledge” (Welfare Warriors Research Collaborative, 2010), http://d3n8a8pro7vhmx.cloudfront.net/q4ej/pages/22/attachments/original/1375201785/compressed_afabulousattitudedefinalreport.pdf?1375201785.

¹⁸ Grant et al., “Injustice at Every Turn: A Report of the National Transgender Discrimination Survey.”



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“How can we integrate education, employment, social services, and public health services to reduce crime and ease the burden on law enforcement?”

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⁷ *Id.*

⁸ Ilan H. Meyer, *Experiences of Discrimination among Lesbian, Gay and Bisexual People in the US* (Williams Institute, UCLA School of Law, 2019), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/LGB-Discrimination-Work.pdf>; Jennifer C. Pizer et al., *Evidence of Persistent and Pervasive Workplace Discrimination Against LGBT People: The Need for Federal Legislation Prohibiting Discrimination and Providing for Equal Employment Benefits*, 45 Loy. L.A. L. Rev. 715, 721 (2012).

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<https://transequality.org/sites/default/files/docs/usts/USTS-Full-Report-Dec17.pdf> (hereinafter "2015 U.S. Transgender Survey") (revealing that 30% of respondents experienced homelessness, and the rate was nearly twice as high among those who lost their job because of their gender identity or expression and transgender women of color); see also *Paying an Unfair Price; Bias in the Workplace*.

Drug use: Law enforcement currently enforces an abstinence only response to drug use. Such tactics exclude from helpful programs people interested in reducing, but not eliminating, their use.¹⁴ However, studies have shown that a harm reduction model, implementing social services that reduce harm related to drug use, are successful in decreasing mortality, both from natural causes and from overdoses.¹⁵ The response to drug use should focus on community approaches to harm reduction instead of policing drug use.

Social Services: A lack of services perpetuates the cycle of poverty which results in the overrepresentation of LGBTQ people in the criminal justice system. Community-based and city services must be expanded to support people with mental and behavioral health disabilities. For example, the City of Baltimore recently conducted a gap analysis of its public health system.¹⁶ Cities and counties should conduct similar analyses and address the shortages identified.

Social services aimed at addressing the needs of LGBTQ people so that they do not end up in the criminal justice system often discriminate against them, leaving LGBTQ people without access to those services. For example, nearly half (48%) of low-income LGBT and gender non-conforming people in New York City reported discrimination by a government or county agency when seeking public benefits, such as food or housing assistance, and many were turned away.¹⁷ In the National Transgender Discrimination Survey, 22% of respondents had been denied equal treatment by government agency personnel and 22% had been harassed or disrespected.¹⁸ Failing to adequately address anti-LGBTQ discrimination in social services may result in LGBTQ individuals being forced into poverty, which then is over policed and thus creates an additional burden for law enforcement. Services must be available to all people without barriers due to bias.

By working with advocates, community members and leaders, and with government at all levels, to improve community-based supports and services, law enforcement agencies can decrease the burden on officers to address issues that are better addressed by community-based or city services. At the same time, they will decrease the pain and costs of overrepresentation of LGBTQ people in the criminal justice system.

¹⁴ Harm reduction: An approach to reducing risky health behaviours in adolescents, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2528824/>

¹⁵ Langendam MW, van Brussel GH, Coutinho RA, van Ameijden EJ. The impact of harm-reduction-based methadone treatment on mortality among heroin users. *Am J Public Health.* 2001;91:774–80.

¹⁶ See Baltimore Public Health System Gap Analysis, available at <https://www.baltimorepolice.org/baltimore-public-health-system-gap-analysis>.

¹⁷ Dwayne Bibb et al., “A Fabulous Attitude: Low-Income LGBTGNC People Surviving & Thriving with Love, Shelter & Knowledge” (Welfare Warriors Research Collaborative, 2010), http://d3n8a8pro7vhmx.cloudfront.net/q4ej/pages/22/attachments/original/1375201785/compressed_afabulousattitudedefinalreport.pdf?1375201785.

¹⁸ Grant et al., “Injustice at Every Turn: A Report of the National Transgender Discrimination Survey.”