# NORTH DAKOTA IMPAIRED DRIVING Newsletter

# Welcome to the Impaired Driving Newsletter for North Dakota 2024, Volume 3; Issue 1:

In this issue of the North Dakota Impaired Driving Newsletter we say goodbye to a state, region, and national impaired driving legend, Gene LaDoucer, Director of Public Affairs, AAA- The Auto Club Group. Gene has announced his retirement, and will be leaving us on the last day of April. Well done faithful servant, well done. It was only fitting that Sandy Wilson write the article, which is a spotlight not only on Gene's contributions, but also on him as a person. While he has certainly earned retirement, his presence, knowledge, passion, and kindness will be greatly missed.

Also in this issue is a Drug Recognition Expert (DRE) Program update. Trooper Tarek Chase became North Dakota's first full-time state-wide program coordinator and he has been busy, shepherding 16 new candidates through DRE School and field certification, running Standardized Field Sobriety Testing (SFST) and Advanced Roadside Impaired Driving Enforcement (ARIDE) refresher courses, and helping put together the summer ND Impaired Driving Conference (Save the Date: June 19-21, 2024 Save the Date). You will also find an update to DRE caselaw with the Olenowski case out of New Jersey and an article on testifying in court.

Finally, included are a list of upcoming training and events along with a training resource listing. As always, feel free to share the information in this newsletter with your colleagues and we want to thank you for continuing the good fight. We wish you peace on your hearts and please be safe out there.

# Volume 3, Issue 1

Welcome to the Quarterly North Dakota Impaired Driving Newsletter.

This resource will provide training information, drug and alcohol trends, legal updates, toxicology, and more to keep you informed.

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# Gene LaDoucer

by Sandy Wilson Program Manager III Highway Safety Division, NDDOT

The Traffic Safety Partner Spotlight is on Gene LaDoucer, Director of Public Affairs, AAA – The Auto Club Group. In the hustle and bustle of our daily lives, we often take the unsung heroes who work tirelessly behind the scenes for granted. One such hero is Gene LaDoucer, whose dedication to traffic safety has profoundly impacted countless lives. Let's take a moment to recognize and thank Gene for his contributions to traffic safety.

- **1. Support for Vision Zero:** Gene has been a steadfast supporter of Vision Zero since its inception in 2018, participating in the launch event and contributing to various emphasis teams focusing on occupant protection, impaired driving, younger and aging drivers, and speed and aggressive driving.
- **2. Legislation Advocacy:** Gene lobbied for the legislation of North Dakota's Graduated Driver License (GDL) law, successfully advocating for its revision to include three phases: permit, intermediate license, and standard license. This law change enhanced safety measures for young and inexperienced drivers.
- **3. Driving Skills for Success (DSFS) Events:** Gene has supported the annual DSFS events hosted by the Highway Safety Division, emphasizing the importance of promoting safe driving practices among young drivers.

- **4. Primary Seat Belt Law (PBL) Support:** Gene has actively supported legislative efforts surrounding the PBL, which is crucial in promoting seat belt usage and enhancing overall road safety.
- **5. Strengthening Move Over Law:** During the 2023 legislative session, Gene played a key role in strengthening North Dakota's Move Over Law, ensuring that drivers must move over for all vehicles on the side of the road with their hazard lights on, backed by penalties for noncompliance.
- **6. Impaired Driving Task Force:** Gene has been a longstanding member of the Impaired Driving Task Force, providing valuable insights and contributions towards enhancing North Dakota's efforts in combating impaired driving.
- **7.** Support for Annual NDSAA/DRE Joint Conference: Gene was a prime sponsor of the annual conference, which supported the training of law enforcement and prosecutors on impaired driving.
- **8. Support for ND Sober Ride:** Gene facilitated an annual sponsorship since 2021 from AAA The Auto Club Group for the ND Sober Ride program, funding 2,271 rideshare coupons to help impaired individuals safely reach their destinations, thus preventing drunk driving incidents.
- **9. Support for Vision Zero Outreach Coordinators:** Gene secured support from AAA The Auto Club Group for grant funding to assist the Vision Zero Regional outreach coordinators in their efforts in schools and at community events to promote traffic safety. He recently donated 120 winter survival kits that were given to Vision Zero Schools. Gene is also the go-to person for the coordinators when there are questions regarding child passenger safety laws.
- **10. Support for Law Enforcement:** Gene has consistently supported law enforcement efforts, including checkpoints conducted by the North Dakota Highway Patrol and local law enforcement agencies, reinforcing the importance of enforcing traffic laws to ensure public safety.

Gene LaDoucer's tireless efforts have saved lives and raised awareness about traffic safety initiatives and best practices. We extend our heartfelt gratitude to him for making our roads safer. Thank you for being an inspiration — best wishes to you on your upcoming retirement on April 30, 2024.

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## Please explain your position and work history.

I have worked for AAA (formerly known as the American Automobile Association) in expanding roles since 2004. I currently direct AAA's public affairs, traffic safety, community involvement and government affairs efforts across the four-state region of North Dakota, Minnesota, Iowa and Nebraska. In that role I serve on a number of advisory committees and provide support to a broad range of coalitions and organizations advocating for issues that impact on AAA's members and the traveling public. I frequently conduct media interviews on topics such as travel, traffic safety, and gas prices, among others. Prior to AAA, I served a similar role with the U.S. Air Force as a superintendent of public affairs. I retired from active duty in 2004 after 22 years' service. During those years, my family and I lived in six states and my wife and daughter provided home-front support while I served deployments in Hungary and Iraq. I will be retiring from AAA on April 30.

# What is your favorite book or podcast?

As I read a lot for work, I'm not a big reader of books nor listener of podcasts in my off time. When I do read a book, it generally has to do with personal finance, investing, or is something that serves to widen my worldview. One book I recently read in that category is *Sapiens: A Brief History of Humankind*.

### What are the values that drive you?

"Service before self" is a value that was instilled in me early in my military career. As someone who benefited from the assistance of a charitable organization and individuals myself, I understanding how helping someone get a leg up can be life changing. I admire others who also see the value in honorably serving others, such as the military, law enforcement, first responders, health professionals and educators. I feel fortunate to have been able to work with many of them in both careers. I view compassion and humility as complimentary values to serving others.

# What do you enjoy doing when you are not working?

I watch a lot of sports and ponder my life as a diehard Minnesota Vikings fan. To counter those frustrations, I like to travel (cruises are a favorite), spend time at the lake cabin, fish, study personal finance and dabble in investing. I also serve as president and treasurer of a Rotary club in Fargo that focuses on improving the lives of children locally, globally and internationally; bringing awareness to the issue of human trafficking; and protecting the environment.

# Admissibility of Drug Recognition Expert Evidence: An Update from New Jersey

Earl G. Penrod, Senior Judge, Indiana SJOL, Judge in Residence, National Judicial College

### State v. Olenowski

The question of whether courts are permitted to admit (DRE) evidence continues to appear in reported Appellate Court decisions from time to time. Many states have yet to provide an answer, while others have addressed the issue relatively straightforwardly. Further, a few states have answered the issue in state statutes or rules (for example, see Maine and North Carolina).

In what is surely the most exhaustive approach to the subject, the New Jersey Supreme Court issued its decision in *State v. Olenowski*, 2023 N.J. LEXIS 1169 2023 WL 7602169 (decided November 15, 2023) in which it found that DRE testimony satisfies the reliability determination as set forth in *Daubert v. Merrell Dow Pharmaceuticals Inc.*, 509 U.S. 579 (1993), with certain limitations. A review of the relatively remarkable procedural history is relevant before setting forth some of the specifics from the opinion.

Defendant, Michael Olenowski, appealed his conviction for drug-impaired driving, which was based in part on DRE evidence. The trial court had denied the defendant's request for a "Frye hearing" (see *Frye v. United States*, 293 F. 1013 (D.C. Cir. 1923) at which the defendant sought to challenge the validity of the DRE as not meeting the general acceptance standard set forth in *Frye*. Olenowski's conviction was upheld on appeal and the New Jersey Supreme Court granted certification to determine whether DRE testimony is admissible under the general acceptance admissibility standard established in *Frye*.

Upon finding that the record was insufficient to determine the admissibility of DRE evidence, the New Jersey Supreme Court appointed a Special Master to conduct a hearing, and in a report that exceeded 300 pages, the Special Master found that the DRE evidence should be admissible under *Frye*. However, because considerable attention in subsequent briefings in the case focused on error rates that are not expressly considered under the *Frye* analysis, the New Jersey Supreme Court requested and received a supplemental briefing on whether the Court should abandon *Frye* and adopt a "Daubert approach" in determining reliability and admissibility of expert testimony.

In Olenowski I (State v. Olenowski, 289 A.3d 456 (N.J. 2023), the Court adopted a Daubert-type standard and remanded the matter to the Special Master to apply that standard. The Special Master found that the 12-step DRE protocol satisfied the reliability standard and should be admissible. In its November 15, 2023 opinion, the New Jersey Supreme Court held that the extensive record in this case substantiates that DRE testimony satisfies the Daubert criteria to be admissible, BUT the Court listed four limitations: 1. The DRE may opine only that the evaluation is consistent with the driver's ingestion or usage of drugs; 2. If the State fails without persuasive justification to reasonably attempt to obtain a toxicology report, the DRE testimony may be excluded; 3. The defense must be afforded a fair opportunity to impeach the DRE; 4. Model instructions to guide juries about DRE evidence should be considered.

While the decision provides a legitimate framework for New Jersey trial courts in how to address the admissibility of DRE evidence, some questions remain, including what constitutes a reasonable attempt to obtain a toxicology report and what language shall be utilized in instructing a jury on how to legitimately consider DRE evidence. Appellate decisions will be forthcoming from New Jersey as to this issue, but it seems that after several years, the *Olenowski* case has finally concluded as the conviction, which was based upon DRE evidence that did not comply with the guidelines set forth, was vacated posthumously. (Thanks to NHTSA Region 2 Judicial Outreach Liaison Richard Nunes of New Jersey for his regular updates and insights on the *Olenowski* saga).

# **Michigan Court of Appeals**

The Michigan Court of Appeals has also recently addressed the admissibility of the 12-step DRE protocol in *People v. Bowden*, 2023 Mich. App. LEXIS 6797 (November 20, 2022) from the Michigan Court of Appeals (thanks to Judge John Grinsteiner North Dakota Judicial Outreach Liaison for bringing the case to the author's attention).

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# North Dakota's DRE Program

Trooper Tarek Chase, NDHP; DRE/SFST State-Wide Coordinator

North Dakota's first Drug Recognition Experts (DREs) were certified in 1999, which comprised of 3 Fargo Police Officers. Then in 2004, North Dakota held its first DRE course and certified fourteen officers from across the state. More recently, North Dakota completed the 2024 DRE School, certifying 16 officers from 10 different agencies.

Like with previous DRE Schools, the 2024 class candidates attended two weeks of classroom training in January hosted by the Bismarck Police Department. There, the candidates reviewed many topics, including the seven drug categories, physiology (including taking pulses and blood pressure), recognizing behavior changes, and general signs and symptoms associated with specific drug categories. Each DRE School also utilizes two separate alcohol workshops (commonly known as wet labs) where the DRE candidates are able to apply and sharpen their skills under the supervision of DRE instructors.

After completing the classroom portion of the DRE School, the candidates traveled to Sacramento, CA for the field certification training. The California Highway Patrol hosted and assisted with the training. As a requirement for DRE certification, the candidates each conducted 12 drug influence evaluations on subjects impaired by substances other than alcohol. The candidates also had to be able to correctly identify a minimum of three separate drug categories which are confirmed by toxicology. Then the DRE candidates compose drug influence evaluation reports on all 12 evaluations conducted during the training. The drug influence evaluation reports are reviewed by DRE instructors to make sure all the appropriate details are included and articulated properly. At the conclusion of the field certification training, the DRE candidates are administered a comprehensive final knowledge examination where they are tasked with recreating, from memory, the entire DRE Symptomology Matrix, including general indicators and duration of effects. The final knowledge examination also includes several drug influence evaluation examples where the candidate is required to complete a full written narrative and correctly identify the impairing drug category or categories.

With the completion of the 2024 DRE School, North Dakota currently has 63 certified DREs from 23 agencies across the state.

With the expansion of the DRE and Standardized Field Sobriety Testing (SFST) Program in North Dakota, a full-time position was created during the 68th Legislative Assembly. As many people may know, I was selected and transitioned to the full-time DRE/SFST State Coordinator position in July of 2023. This position oversees all impaired driving-related training in the state and is responsible for maintaining the integrity and consistency of the SFST and DRE programs. Currently, I assist in coordinating SFST, ARIDE, and DRE courses for North Dakota law enforcement officers. The State Coordinator oversees all certified DREs and maintains their certification through the International Association of Chiefs of Police. The State Coordinator also oversees the 83 SFST instructors, from 28 agencies, to assist with course planning, training materials, and reference information. I also work closely with the ND Department of Transportation and Traffic Safety Resource Prosecutor to plan additional training opportunities, such as the ND Impaired Driving Conference and the DRE/SFST Instructor In-service for ND law enforcement and prosecuting attorneys.

I will continue to plan regular impaired driving-related trainings, but I welcome training requests from agencies wanting additional courses. Please contact me with any questions or requests.

## **New Jersey Update** (continued from Page 4)

The Court of Appeals held that the trial court had improperly permitted the DRE to testify that, based upon the drug recognition evaluation, the defendant was impaired and unable to safely drive a car. The majority opinion noted that the studies in support of the validity of the DRE process only validated the DRE protocol's accuracy in determining the presence of a substance but not in determining a subject's degree of impairment. In short, there was nothing in the record to support that the DRE protocol can reliably be used to detect the level of intoxication caused by marijuana and whether that level of intoxication made the person unable to safely drive a vehicle.

There is a dissent in the case in which the Judge found the record supported the trial court's conclusions that the DRE could testify as an expert under Michigan Rule of Evidence 702 and opine whether the defendant operated her vehicle under the influence of marijuana and was impaired to a degree that rendered her unable to safely operate the vehicle. While the dissent was in the minority in this case, the dissent's conclusion is more consistent with decisions from other jurisdictions across the country.

The request for leave to appeal to the Michigan Supreme Court was denied on September 20, 2023, see People v. Bowden, 994 N.W. 2d 776 (Mich. 2023).

# North Dakota 2023 Fatal Crash Statistics as of 12/31/2023





Fatalities: 106

Crashes: 96

Operators Tested Positive BAC: 28

Operators Tested Negative BAC: 45

Operators Not Tested: 17

Fatalities from Alcohol Crashes: 30

No Seat belt (for seat belt eligible vehicles) 38

Speed-related fatalities: 22

Pedestrian fatalities: 10 Motorcycle fatalities: 16

Fatal Crash Involved Lane Departure: 51

Fatal Crash Involved a Younger Driver(s) 14-20 years old: 9

Fatal Crash Involved an Older Driver(s) 65+ years old: 29

Fatal Crash Involved a Train: 3

Fatal Crash Involved a Commercial Motor Vehicle(s): 21

Holiday Fatalities: 16

For a full look at the Fatal Crash Stat Board and how the numbers compare to 2022 and 2021, visit: <u>2024 Fatality Spreadsheet.xlsx (nd.gov)</u>. You can also find a link to the 2022 North Dakota Crash Summary here: <u>NDDOT 2022 Crash Summary.indd</u>.

<sup>\*\*\*</sup> This article originally ran in Issue #22 of NJC's Directions: The Newsletter of the Judicial Resource Center on Drug-Impaired Driving, reprinted here with permission.

# from the desk of the SJO L Judge John Grinsteiner (retired)

# Being Prepared, Avoiding the Pitfalls, Having a Good Presentation, and Knowing the Attacks

# **BEING PREPARED**

Whether it is a preliminary hearing or a trial, giving good testimony comes down to one thing, being prepared. Maybe you have heard about the six Ps of life, "proper preparation prevents piss poor performance." This mantra was taught to me as a young lawyer by an old school judge. Although embarrassing at the time, it was a valuable lifelong lesson.

If you are a faithful reader of the North Dakota Impaired Driving Newsletter (and I suggest you should be), you will recognize that the six P's and the testimony tips that follow came from nearly two years ago when they first ran as a series of short articles. Why they are back? Because they are still relevant, AND I have added to them.

In the interests of space and time, I will list the prior tips in bullet form with only short explanations, dedicating the rest of the article to the new information. With that said, get in, sit down and put your seat belt on (it's the law). Here we go!

- Preparing to testify starts with knowing your report. The time between when you made the arrest/report and the date of the hearing is frequently weeks, months, or even more than a year (in some fatalities).
- Read your report. Don't wait until you are sitting on the witness stand, read it before! If you wrote a good one, it shouldn't take long.
- Write a good report. Ask around (your sergeant or lieutenant, the state's attorney, or even another agency). Find out who is a good report writer, read some of their reports, and ask how they do it. Put in a unique detail to help you remember the case and always be accurate as the defense will scrutinize every detail of the report, especially probable cause and reason for the stop. The better your report, the less likely the case will every go to trial or need you to testify.
- If possible, talk to the prosecutor and try to develop some level of relationship. Provide them with your updated (at least yearly) CV or resume, listing your training and experience.
- Be prepared to explain your specializations so that a jury or judicial officer can understand them easily. Being able to explain something so that a 10-year-old can understand it will make anyone seem like an expert, immediately adding credibility. You can even offer to demonstrate how the tests are conducted.
- For example, what is a DRE? You should be able to explain this confidently in one or two minutes. That explanation comes only with practice. This ability to simply explain should also extend to, and include the roadside tests (SFST) you conduct.
- If you have never testified before or if it has been awhile, preparation can help. Go to the courthouse the day before. Find out where to park, go through security, locate and check the courtroom information board, and find the right courtroom where you are going to be.
- Walk the whole building, noting offices, and even where the bathrooms are. Next, go into the courtroom. Take it all in, noticing how the room is set up, the gallery, the bar (divider which keeps the public separate from the actors), where the attorneys sit, the judge, the witness stand, etc.
- The following day when you show up for the real thing, you already have the lay of the land and can act like you have been there before. It helps to relieve some of the stress and anxiety of the day.
- Your testimony and the need for it on a specific day, should not be a surprise. Communicate with your staff and the state's attorney. When and where will I be needed? What do you think the issues will be (the stop, test, observations, expertise, etc.)? Check in frequently as this can change.

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The big day is here. It's time to testify. The reason why you are not in panic mode is because you have done the preparation. Don't let all that POST/ARIDE/DRE and field training go to waste. You know how to write a good report and, if given a few minutes, you can read and be back up to speed on the case. You have talked to the prosecutor(s) before and have a good working relationship. They know your qualifications because you have previously provided them with your CV or resume. You know your specializations and your tests like the back of your hand, and you have been to the courthouse you are being called to before. Knowing what to expect can make the difference between getting flustered or leaving the courtroom knowing you have played a valuable role in the legal process. All of this preparation can lead to better testimony and certainly reduce the stress level when it is time to do so. Let's talk about the next steps.

# **AVOIDING PITFALLS**

My best advice to any witness is to listen to the question and give your answer, being as concise and straight forward as possible. It is human nature to tell stories, but you should fight this urge when testifying. Simply answer the question asked. Many times, that requires only a simple yes or no response. Going into long explanations is exactly what the opposing/defense attorney is hoping you will do. This gives them the chance to lead you, and the jury/judge, away from the facts that hurt their case.

Being concise and straight forward with your answers gives you immediate credibility with the judge and/or jury. It sends the signal that you are not afraid of the truth, that you believe the truth will come out, and that you are willing to answer the tough questions without hedging your answers. The facts are the facts and trying to twist them only damages credibility. Credibility matters almost as much as the actual facts.

Use simple language. Experts often make the mistake of filling their testimony with jargon that is unfamiliar to the jury or the judge. Ultimately, experts who testify should see their role as an educator. Being able to use concise simple language when describing something technical is what truly makes you an expert.

# **GOOD PRESENTATION**

What would good testimony look like? The prosecutor should be prepared to lay an adequate foundation for DRE testimony beginning with officer qualifications and following with: an explanation of the drug matrix; why seven drug categories; how the matrix is used; the origin of the standards; providing an example of differing drug categories; explaining how not all signs and symptoms are required to find impairment of a particular drug category; the initial observations of the defendant; any conversation with the arresting officer; and medical rule out, explaining the DRE is not only trying to determine if impairment is present, but is interested in the safety of the defendant.

The prosecutor should follow this up with any lifesaving events initiated by the DRE on drug-impaired subjects. They should talk about accuracy rate (someone is going to ask the question, so you may as well introduce it in direct examination). Be prepared to explain on direct examination why the DRE's observations differ from the arresting officer. It is a common defense tactic to talk about the missing signs or symptoms as if the DRE is unable to offer an opinion. Be prepared to address this in direct examination. Do not forget the effect of homeostasis, which is one of the reasons for the discrepancy in the time between the arrest and the DRE's evaluation, as well as polydrug use.

The prosecutor should use visual aids when appropriate. When the DRE teaches the judge or jury something it builds his/her credibility. Have the DRE demonstrate the use of a pupilometer and how blood pressure is taken. Prepare a chart listing the signs of impairment observed by the DRE, arresting officer and other witnesses and relate that to the findings. Use any video of SFSTs at roadside or during the DRE evaluation. Eye signs are some of the best evidence of impairment. Eyelid tremors, lack of convergence, and rebound dilation are dynamic visuals for the jury to see. Prepare a chart with the one-step protocol and a chart with the seven drug categories as visual aids. Lastly, if you did not perform some of the tests in the environment they were designed to be performed in (dark room not roadside) be prepared to explain why, and more importantly, how they affect the results.

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# KNOWING THE ATTACKS

Finally, here are some common ways the defense may attack a DRE on cross-examination. Knowing them in advance can help you be prepared and defend against them.

MISSING SIGNS This line of questioning focuses on the fact the defendant did not have all the expected signs of the drug category the DRE identified in his or her expert opinion. They usually do not ask more about the missing sign because that would invite the DRE to explain why the sign might be missing.

**NORMAL SIGNS** This line of questioning focuses on the fact the defendant's signs were normal, and therefore not consistent with the drug category in question.

ALTERNATIVE EXPLANATIONS This line of questioning is perhaps the most understandable technique for a jury, the alternative explanation line of inquiry focuses on everyday rationales for symptoms. These alternative explanations can deal with sleep fatigue, stress, a traffic accident, medical conditions, etc.

CLIENT'S NORMAL "Average" or "normal" accounts for very few people. They will try to show the jury that the officer has no concept of what normal or average really means.

DOCTOR COP/JUST A COP This is best set up in opening or voir dire by asking a juror, especially someone who works in construction, if he uses a plumber to do the electrician's job or vice versa. E.g., "Juror 5, if I told you I had a worker to do the plumbing but he was trained by an electrician, would that work for you? Why not?" They will argue that no one would want to place what is essentially a medical diagnosis in the hands of a cop, who was taught by another cop, how to take a pulse, measure pupil size, obtain blood pressure and evaluate outward symptoms.

THE UNKNOWN This attack challenges the DRE's expertise by requiring the officer to state he or she does not know how a drug causes a sign or symptom, but was told only that it should be there by a cop-trained cop.

THE GUESSING GAME Officers use pupil dilation, pulse rate, and blood pressure to identify a drug. These vital signs require years of training to cross reference with a possible cause. The jury needs to hear this, especially when the DRE is new and has only a few evaluations.

**TRAINING COMPARISON** If a non-DRE trained officer is testifying instead, the defense might try to run through how intense DRE training is to show the complete lack of experience the traffic cop has. Another line of inquiry is to compare the completeness of the training an officer receives to carry a gun versus DRE training, getting the officer to describe how much training he or she needed to get to use a gun versus the training for DRE.

LACK OF SCIENTIFIC UNDERSTANDING The defense may try to show the jury that the officer really isn't much more than a parrot when it comes to understanding the science. In short, that the DRE doesn't understand the science behind the evaluations.

# **Upcoming Training and Events**

# **Lifesavers Conference**

April 7-9, 2024 Denver, Colorado

https://lifesaversconference.org/future-conferences/

Lifesavers Conference on Roadway Safety to be held at the Colorado Convention Center in Denver. Registration is now open.

### **All Rise**

May 22-25, 2024 Anaheim, California https://allriseconference.org/about-rise/

RISE returns to Anaheim California. RISE is the world's premier conference on addiction, mental health, and justice reform. Since 1995, All Rise has convened the only national conference for treatment court professionals. Expanding alongside our field, RISE attendance has grown to include a wide array of public health and public safety leaders working to expand treatment for people impacted by

substance use and mental health disorders. What remains constant is the unparalleled education, networking, and fellowship enjoyed by every attendee. Whether you're a regular or first-timer, new to treatment courts or a seasoned pro, you are invited to attend this landmark event and join in its mission of ensuring every individual in the justice system has access to evidence-based treatment and recovery.

# IACP Impaired Driving and Traffic Safety (IDTS) Conference

August 16-18, 2024 Washington, D.C. https://www.theiacp.org/IDTSconference

Governors Highway Safety Association (GHSA) September 7-11, 2024 Indianapolis, Indiana https://www.ghsa.org/events/Annual-Meetings/2024

# Training Resources

TSRP Webpage • www.ndsaa.org User Name: tsrp • Password: tsrp

This website was developed to provide those invested in traffic safety with a warehouse for current information, training opportunities, case law updates, related resources, interesting and relevant news articles, etc., so we can continue to focus on our goal of making North Dakota's roadways safe. Following is a list of items available.

- Impaired Driving Training Materials & Manuals
- Memo Library
- Impaired Driving Training Video Library
- SFST Training Videos
- The Two Beer Manual and latest case law updates
- Webinars

