

# Final Report for the Comprehensive Review of the University of Cincinnati Police Department



Submitted to:  
The University of Cincinnati  
Office of Safety and Reform

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# Table of Contents

<b>I.</b>	<b>INTRODUCTION.....</b>	<b>3</b>
<b>II.</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>4</b>
	A. FUNDAMENTAL FINDINGS AND RECOMMENDATIONS .....	4
<b>III.</b>	<b>HISTORY OF THE DEPARTMENT .....</b>	<b>9</b>
<b>IV.</b>	<b>BACKGROUND OF THE ASSIGNMENT .....</b>	<b>12</b>
<b>V.</b>	<b>SCOPE OF THE ASSIGNMENT .....</b>	<b>14</b>
<b>VI.</b>	<b>METHODOLOGY .....</b>	<b>15</b>
<b>VII.</b>	<b>TEAM MEMBERS .....</b>	<b>16</b>
<b>VIII.</b>	<b>SUBSTANTIVE AREAS OF INQUIRY .....</b>	<b>23</b>
	A. REVIEW OF PEDESTRIAN STOPS AND TRAFFIC STOPS .....	23
	B. REVIEW OF USE OF FORCE .....	28
	C. REVIEW OF POLICIES AND PROCEDURES .....	36
	D. REVIEW OF OFFICER RECRUITMENT, HIRING, PROMOTION, AND RETENTION .....	41
	E. REVIEW OF TRAINING.....	54
	F. REVIEW OF ACCOUNTABILITY MECHANISMS .....	68
	G. REVIEW OF SPECIFIC TACTICS INCLUDING COMMUNITY ENGAGEMENT, PROBLEM-ORIENTED POLICING, AND CRIME PREVENTION .....	75
	H. REVIEW OF ENCOUNTERS WITH INDIVIDUALS WITH MENTAL HEALTH CONCERNS.....	83
	I. REVIEW OF EQUIPMENT .....	87
	J. REVIEW OF TECHNOLOGY .....	93
	K. REVIEW OF DATA COLLECTION SYSTEMS, DATA USAGE, AUTOMATION, AND RECORDS MANAGEMENT.....	99
<b>IX.</b>	<b>CONCLUSION .....</b>	<b>109</b>
<b>I.</b>	<b>APPENDIX A.....</b>	<b>110</b>

# I. Introduction

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The shooting death of Samuel DuBose is a tragedy that shook the University of Cincinnati (the “University” or “UC”), its Police Department (the “Department” or “UCPD”) and the Cincinnati community to their core. In the wake of that tragedy, the University Administration has commendably taken a series of steps to determine what led to the shooting and how to best ensure that mistakes of the past are never repeated. One such step was the engagement of the Exiger team to perform a comprehensive review of UCPD.

Over the last four months the Exiger team has spoken to a significant number of members of the University faculty, staff, administration, student body, as well as numerous Cincinnati residents and reviewed thousands of pages of documents in an effort to fully understand the improvements that are necessary to help transform UCPD into a model law enforcement agency by combining best practices of urban, university and community policing.

This is the Exiger team’s final report in which we present our findings and recommendations for remediation and reform of the organization. Many of the recommended reforms are significantly underway, some being undertaken even prior to our arrival. Our report consists of this Introductory Section, an Executive Summary including the “Fundamental Recommendations” which form the foundation for UCPD to become the model agency toward which it strives; a background section that covers the history of the UCPD, and the incident that gave rise to this assignment; a section outlining the scope of the assignment; followed by a section on the methodology utilized for completion of the assignment; and finally, a section containing the biographies of the members of the Exiger team. This is followed by a series of sections that cover each of the subject matter areas specified in the Request for Proposal. All told, there are 14 Fundamental Findings with 25 corresponding Recommendations, and there are 115 additional findings with 251 specific recommendations which the team believes, if implemented, will collectively transform the Department.

## II. Executive Summary

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It can be said that nothing is more important to the perception of fairness in government than the way in which that government polices its residents. This is no less true for a university police department than it is for a municipal or state police department. While the primary role of the police is to ensure public safety, the manner in which it does so, and the extent to which, as an organization, it follows the rule of law, and is true to its own mission and values, is as vital to the health of a law enforcement organization as the ultimate statistics measuring crime. The undertaking of a comprehensive review by the University is the first step in ensuring that all processes and operations of the UCPD are operating in an appropriate manner and represent best practices in policing today.

In executing this Review, the Exiger team collected and analyzed documents and conducted interviews pertaining to each of the 13 substantive areas covered by the scope of work with the goal of identifying gaps between the current state of the UCPD and its ideal state in terms of mission, values and the utilization of best practices.

Part of the Review necessarily included an examination of whether the UCPD is striking the appropriate balance between the measures necessary to ensure safety, deter crime and provide a sense of security to all its constituencies, and, the desire to maintain UC as a welcoming and open environment that serves not only a diverse faculty, student and staff population, but also the economically and racially diverse populations that live in the surrounding communities.

What we found was that, despite an extremely dedicated and good-willed staff of both sworn and unsworn personnel, many of the critical processes and functions of the department fell well short of best practice. We believe, however, that with the right oversight and a relentless commitment to purpose, best practices can, in relatively short-order, be woven into the fabric of the organization, with UCPD becoming a model for not only university policing, but moreover, for the community problem oriented policing (CPOP) model that holds the key to solving many of the issues facing policing in America today.

### A. Fundamental Findings and Recommendations

While all of the Findings and Recommendations contained in this report are important and represent best practice, the following Fundamental Findings and Recommendations lie at the foundation and core of the reform necessary to begin the process of addressing the shortcomings of the Department.

**Finding 1:** UCPD does not currently have a mission statement

that clearly describes its function, and reflects its basic philosophy.

**Recommendation 1A:** UCPD should adopt a mission statement that will serve as a foundation and guidepost for its going-forward reforms.

**Recommendation 1B:** UCPD's mission statement should (1) provide for the safety and security of faculty, staff, students and visitors, (2) promote concepts of fairness, non-biased policing with minimal intrusion, and (3) promote service to the broad University community.

**Finding 2:** The UCPD currently has no internal audit, inspectional service, or monitoring function.

**Recommendation 2A:** UCPD should establish an internal audit or inspectional service that reports directly to the Vice President of Safety and Reform.

**Recommendation 2B:** Critical areas and functions of the Department should be audited on a regular cycle, as memorialized in an annual audit plan.

**Recommendation 2C:** In addition to the audits, a voluntary monitoring function, similar to that imposed in the DOJ Consent Decrees, should be established to track each of the reforms outlined in the recommendations of this report and ensure that they are implemented according to the suggested or agreed upon schedule.

**Finding 3:** UCPD lacks an effective process for developing and managing new policies and procedures, and reviewing and updating existing ones.

**Recommendation 3A:** UCPD should update its policies and procedures to reflect campus law enforcement best practices, and assign ongoing responsibility for ensuring that they are kept current.

**Recommendation 3B:** UCPD should, at a minimum, become certified by CALEA<sup>1</sup> and/or IACLEA.<sup>2</sup>, if not

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<sup>1</sup> The Commission on Accreditation for Law Enforcement Agencies (CALEA) is a credentialing authority, based in the United States, whose primary mission is to accredit public safety agencies, namely law enforcement agencies, training academies, communication centers, and campus public safety agencies.

<sup>2</sup> The International Association of Campus Law Enforcement Administrators (IACLEA) is a leading voice for the campus public safety community, and its membership represents more than 1,000 colleges and universities. Its goal is to advance public safety for educational institutions by providing educational resources, advocacy, and professional development services.

both, of these certifying entities.

**Finding 4:** Prior to the shooting death of Samuel DuBose, traffic stops were being conducted in unprecedented numbers as part of the philosophy of the then newly installed Chief.

**Recommendation 4A:** Traffic and pedestrian stops should not be used as a crime fighting tool by UCPD. Clear guidance by policy and procedure should be given as to how traffic stops should be conducted and when, if ever, off-campus traffic stops are permissible.

**Recommendation 4B:** The Office of Safety and Reform, must continue to ensure the collection, aggregation, and analysis of all relevant stop data.

**Finding 5:** UCPD does not have an implemented policy on biased policing.

**Recommendation 5A:** UCPD should fully implement a policy on biased policing that clearly and unequivocally indicates that UCPD officers may not use race, color, ethnicity, or national origin, to any extent or degree, in conducting stops or detentions, or activities following stops or detentions, except when engaging in appropriate suspect-specific activity to identify a particular person or group.

**Recommendation 5B:** UCPD should develop a curriculum and institute training on the biased policing policy including training on implicit bias and should deliver such training both to new and existing members of the department. In-service training on the topic should be developed and delivered annually.

**Finding 6:** UCPD's policies on Use of Firearms and Deadly Force and Less Lethal Uses of Force are insufficient, do not reflect current best practices and lack clarity regarding the circumstances under which the use of force is authorized.

**Recommendation 6A:** UCPD should draft and implement a single Use of Force policy that should cover both when force is permitted to be used as well as the resulting departmental investigation and review process of uses of force.

**Recommendation 6B:** UCPD's new use of force policy should emphasize de-escalation and sanctity of life.

**Finding 7:** UCPD does not currently arm UCPD officers with

Conductive Energy Devices (CEDs), removing an option that would allow officers the ability, in appropriate circumstances, to disable an individual from a safe distance and avoid potential resort to deadly physical force.

**Recommendation 7A:** UCPD should expand the alternatives that its officers have to the use of deadly physical force by arming UCPD officers with CEDs, complying with whatever constraints may exist from the settlement of prior lawsuits.

**Recommendation 7B:** A clear policy statement governing the use of less-lethal weapons should be included in the revised use of force policy.

**Recommendation 7C:** UCPD should develop intensive training on the use of CEDs and the relevant policies related thereto. Training should include scenarios in which the utilization of CEDs is appropriate and those instances where it is not.

**Finding 8:** UCPD lacks a clearly defined method of investigating uses of force by its members.

**Recommendation 8A:** UCPD should establish a protocol for the timely review of every use of force to determine the appropriateness of such use of force from an administrative point of view and whether or not further investigation, including potential criminal investigation, or discipline is appropriate.

**Finding 9:** UCPD's written policies and procedures for hiring do not prioritize the need to establish a police officer candidate pool that is representative of the diverse community it serves.

**Recommendation 9A:** UCPD should update its hiring policy by requiring a diverse slate of candidates throughout the police officer recruitment process.

**Finding 10:** Training Policies and Procedures are generic and out dated and do not meet the needs of UCPD.

**Recommendation 10A:** UCPD should draft and adopt consistent policies and procedures for the development and approval of all UCPD courses and ensure that all such courses are consistent with the mission and philosophy of the department.

**Finding 11:** UCPD policies with respect to complaint receipt, investigation, and disposition are inadequate.

**Recommendation 11A:** UCPD should draft comprehensive Complaint Initiation Policies and Procedures that define the workflow of the different categories of complaints from investigation to adjudication.

**Recommendation 11B:** These policies and procedures should, among other things, prohibit any attempt to dissuade an individual from filing a complaint, and require officers to report the misconduct of other officers including improper use or threatened use of force, false arrest, unlawful search or seizure, or perjury.

**Finding 12:** UCPD's effort to develop and maintain a robust community affairs program is not centralized or coordinated.

**Recommendation 12A:** The essential nature of the community affairs function within the UCPD should be recognized and appropriate resources dedicated to it.

**Recommendation 12B:** Community Oriented Problem Solving Policing should be infused throughout the fabric of UCPD.

**Finding 13:** UCPD is currently using several different systems for collecting and storing data, including the Computer Aided Dispatch (CAD) system, Automated Records Management System (ARMS), Guardian Tracking, the Institute of Crime Science (ICS) Dashboard, and a number of unconnected Microsoft Access Databases (MADs).

**Recommendation 13A:** To the extent that it is possible, UCPD should integrate its data collection systems into one large database that tracks all of its data, or create an umbrella program that would operate like a search engine to allow UCPD to search and pull relevant data from all the UCPD databases.

**Finding 14:** The UCPD has historically made little use of the vast resources of the University at large.

**Recommendation 14A:** UCPD should make maximal use of UC's resources in order to fully implement the recommendations made in this report.



### III. History of the Department

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The UCPD is a fully empowered law enforcement agency that provides all public safety and emergency services for the University of Cincinnati, a state university, with 14 colleges, approximately 44,000 students and 15,000 employees, and an economic impact of more than \$3 billion. All UCPD Police Officers have full police authority, and are certified law enforcement officers by the State of Ohio, having completed all training requirements required by the Ohio Peace Officer Training Commission (OPOTC). UCPD currently has an authorized strength of 74 sworn members throughout all ranks, and currently employs 26 security officers.

The UCPD was formed in 1965 when administrators of the University and Cincinnati General Hospital decided that a formal police department was needed. Prior to 1965, the campus had private police and contract guards. The first certified police officers that were hired acted as supervisors for the contract security officers and building guards working in those campus areas. In 1967, retired Cincinnati police lieutenant Paul Steuer was hired as police chief of the University, and retired Cincinnati police officer John Reed was hired as chief of police for Cincinnati General Hospital. The officers were not armed until 1968. In 1975, campus security formally became the Department of Public Safety. The UCPD and the General Hospital Police merged into one department with state police authority when the University became a state university in 1977.

From 1978 through January of 2011, the UCPD was run by Chief Gene Ferrara. Over the course of its 50-year history, the UCPD was involved in four police officer related deaths, two of which occurred during Chief Ferrara's tenure. The first occurred in February of 1997, when Lorenzo Collins, a 25-year-old African American man with a history of mental illness, was shot three times by both a UCPD officer, and an officer of the Cincinnati Police Department ("CPD"). Minutes before the shooting, Mr. Collins had escaped from the psychiatric ward of the University Hospital, and at the time of the shooting, he was threatening the officers with a brick. After an investigation by both the CPD and the UCPD, no disciplinary action was taken against either officer. The second occurred in January of 2010, when Kelly Brinson, a 45-year-old African American male and mental health patient died after he was tased and restrained by UCPD officers inside the University Hospital. The UCPD officers alleged that Brinson had assaulted a law enforcement officer and ignored repeated directives to stop. None of the officers involved received any form of discipline as a result of this incident.

During this period there were other incidents that caused un-

rest between the Cincinnati community and the officers who police them. In 2001, between April 9 and April 13, there were a series of protests in downtown Cincinnati, as a result of the shooting of an unarmed African American man by the CPD. Violent protesters threw objects at policemen, and vandalized and looted businesses causing \$3.6 million in damage to businesses and another \$1.5 to \$2 million to the city. Thereafter, the City worked with the community and police to improve training and policies. In addition, in December of 2002, a United States District Court Judge for the Southern District of Ohio appointed Saul A. Green and a team of eight policing experts to monitor compliance with, and implementation of, the Memorandum of Agreement (MOA) between the United States Department of Justice, the City of Cincinnati and the CPD. Over the course of the six-year monitorship, the monitoring team published one final report and 21 quarterly reports chronicling the state of compliance by the parties with the MOA.

In January of 2010, as a direct result of increasing crime against students in the areas surrounding the University, the UCPD entered into a Memorandum of Understanding (MOU)<sup>3</sup> with the City, which gave the UCPD broader jurisdictional authority within the City limits. Specifically, the MOU allowed UCPD officers to:

- Conduct felony arrests off campus and then turn the case over to the CPD;<sup>4</sup>
- Conduct misdemeanor arrests off campus and maintain responsibility for the case;<sup>5</sup>
- Investigate crimes that occur on campus and which continue into the jurisdiction of the City of Cincinnati.<sup>6</sup>
- Conduct off-campus arrests for serious motor vehicle violations — including operating a vehicle while intoxicated and motor vehicle violations causing death or serious harm — and then turn the case over to the CPD.<sup>7</sup>
- Conduct arrests for all other off-campus motor vehicle violations and maintain responsibility for the case.<sup>8</sup>

In January of 2011, Chief Ferrara retired after 33 years of service, and the UCPD entered a period of instability in its leadership. Immediately after Chief Ferrara's retirement, Assistant Chief Jeff Corcoran was appointed as Interim Chief. He served for 10 months before being replaced in November of

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<sup>3</sup> The title of the document is "Mutual Assistance In-Progress Crime Assistance Agreement Between the City of Cincinnati and the University of Cincinnati." It appears that while drafted in 2009, the MOU was not signed, at least by one signatory, until January 8, 2010. The document itself remains undated.

<sup>4</sup> MOU Section I. A

<sup>5</sup> Id.

<sup>6</sup> MOU Section III.

<sup>7</sup> MOU Section I. B.

<sup>8</sup> Id.

2011, by Chief Michael Cureton. Chief Cureton served for 20 months before resigning in July of 2013. Assistant Chief Corcoran again served in the role of Interim Chief, until November of 2014, when replaced by Chief Jason Goodrich. Chief Goodrich served until February 2016, when he was asked to resign as a result of an investigation, conducted by Exiger, into certain statements and representations to the senior administration of the University that he made following the DuBose shooting<sup>9</sup>.

During this period of shifting leadership, the UCPD was involved in two additional officer involved fatalities. The first occurred in August of 2011, when a UCPD officer deployed his TASER resulting in the death of Everette Howard, an 18-year-old African American high school graduate enrolled in UC's Upward Bound Program. The officer involved indicated that Howard was "agitated" and "charged" at him. The officer claimed he ordered Howard to stop prior to using his TASER, but that Howard refused. As a result of this incident, in August 2011, the UCPD removed TASERs from use.

The last officer involved death, that of Samuel DuBose, occurred on July 19, 2015. This incident served as the catalyst that led to Exiger's review, and is discussed in further detail in the following section.

Following the death of Samuel DuBose, the Chief of Police, who previously had reported directly to the Senior Vice President of Administration and Finance, began reporting to the new Director of Public Safety who was appointed in August of 2015. The Director of Public Safety, in turn reported to the Senior Vice President of Administration and Finance until April of 2016, when the reporting structure changed, with the Director of Public Safety reporting to the Vice President for Safety and Reform, who in turn reported directly to the President of the University. We believe this change was important and appropriate.

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<sup>9</sup> During the first weeks of this comprehensive review, facts came to light that called into question the statements and representations made by Chief Goodrich following the shooting of Samuel DuBose. As a result of the questions raised, Exiger was asked to undertake an investigation of the facts and circumstances surrounding the statements and representations made by the Chief. A report of that investigation was delivered to the University on February 29, 2016.

## IV. Background of the Assignment

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On July 19, 2015, former-UCPD Officer Raymond Tensing conducted a traffic stop approximately one mile off-campus. During this stop, an altercation occurred between the driver of the car, Samuel DuBose, and the officer, resulting in the shooting death of Mr. DuBose by Officer Tensing. The CPD conducted the initial investigation and provided all investigative materials to the Hamilton County Prosecutor's Office. Officer Tensing was indicted for the murder of Samuel DuBose by a Hamilton County Grand Jury and subsequently dismissed from UCPD.

The immediate days and weeks following the incident saw calls for reforms from both City officials and the community. As a result, the UC Administration engaged in a number of review and reform efforts, including:

- Creating the UC Office of Safety and Reform (OSR);
- Appointing Dr. Robin Engel as Vice President of Safety & Reform to oversee all review and reform efforts related to the UCPD, and public safety more broadly;
- Creating the position of the Director of Public Safety, to whom the Chief of Police would report, and hiring James Whalen to fill that position;
- Creating the position of the Director of Police-Community Relations, and hiring S. Gregory Baker to fill that position; and
- Establishing the UC Safety and Reform Community Advisory Council (CAC), consisting of 19 members representing various groups from the University and the larger Cincinnati community, for the purpose of building, enhancing and expanding UCPD's relationships with the diverse local communities.

On July 31, 2015, the University retained Kroll Inc. to conduct an external review of all aspects of the officer-involved shooting. On September 11, 2015, Kroll issued a report concluding that although the traffic stop was justified, Officer Tensing "made critical errors in judgment that created an elevated risk of a serious or fatal bodily injury."<sup>10</sup> The Kroll Report further concluded that Officer Tensing was not justified in using deadly force on Samuel DuBose.

The Kroll Report went on to offer a series of recommendations, including that the UCPD should:

- Consider limiting the parameters of off-campus patrol;
- Re-assess its defined mission and determine if it has the skill sets necessary to perform the requirements of urban policing;

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<sup>10</sup> Kroll Report, Page 46

- Perform a more extensive review of its policies and procedures;
- Evaluate how to create a diversified police force that more accurately reflects the rich diversity of the University of Cincinnati and surrounding communities; and
- Further evaluate and assess existing training requirements to ensure they incorporate statewide objectives.<sup>11</sup>

As a result of the Kroll Report's recommendations, on November 16, 2015, the University, in collaboration with the CAC, issued a Request for Proposal (RFP), seeking a comprehensive external review of the UCPD's policies, procedures, practices, and training, "in an effort to strengthen UC's commitment to incorporate trust, open communication and cooperation between the UCPD, members of the UC and surrounding neighborhoods."<sup>12</sup> On December 21, 2015, Exiger submitted a proposal to the University in response to the RFP. On or about February 1, 2016, the University informed Exiger that its team had been chosen to perform the Review, which commenced on February 8, and will last through the delivery of this report and a number of subsequent meetings to discuss its contents.

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<sup>11</sup> Kroll Report, Pages 61-63  
<sup>12</sup> See RFP, Page 9.

## V. Scope of the Assignment

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To perform the Review of the UCPD, the University asked Exiger to focus on the following 13 areas:

- Policies and Procedures;
- Data Collection Systems, Data Usage, Automation, and Records Management;
- Training;
- Accountability Mechanisms;
- Officer Recruitment, Hiring, Promotion, and Retention;
- Equipment;
- Training;
- Use of Force;
- Pedestrian and Traffic Stops;
- Encounters Involving Individuals with Mental Health Concerns;
- Community Engagement, Community-Oriented Policing, and Student Engagement;
- Problem Solving, Problem-Oriented Policing, and Use of the SARA Model; and
- Crime Prevention Tools, Practices, and Strategies;

For each of these 13 areas, Exiger was asked to perform a series of tasks, some of which were specific to that particular area of the Review. In each area of the Review, Exiger was asked, at a minimum, to:

- Review the UCPD's relevant policies and procedures;
- Assess the extent to which the UCPD's practices compare with best practices for urban university police agencies;
- Identify areas where the UCPD needs improvements; and
- Provide actionable recommendations to rebuild trust between the UCPD and the community.

## VI. Methodology

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Prior to being awarded the contract, Exiger began planning and ultimately devised a methodology that allowed us to accomplish the goals of the Review in an efficient and cost effective manner. During the first week of the Review, a large document request was sent to the University, seeking all relevant written documents – including the UCPD’s written policies, procedures, training manuals, and practices. In response to this request, several hundred electronic documents were received from the University, which were placed into a secure online repository where they could be viewed by all Exiger team members.

On February 15, 2016, several members of the Exiger team conducted the first of many site visits at the University. While there, the Exiger team familiarized themselves with the UCPD, the University, and the City, met with key stakeholders,<sup>13</sup> and picked up written documents and materials that could not be transmitted electronically. Over the course of the engagement many of the team members made additional trips to the University in order to further observe the practices of UCPD, conduct follow-up interviews with UCPD officers and other key personnel, meet with community leaders, and collect additional documents.

For each of the thirteen areas of the Review, Exiger assigned one team member to act as the team lead. Each team lead was responsible for reviewing relevant documents, conducting interviews, observing UCPD practices, and providing findings and recommendations for his/her area of the review. For most of the areas reviewed, Exiger also assigned an additional team member to provide assistance to the team lead. The findings and recommendations made by the team leads were then shared with the rest of the team, so that other Exiger team members could read them and provide feedback. Over the course of the project, the Exiger team conducted a weekly conference call, during which the team leads provided the project lead and other team members with status updates, including any new findings or recommendations.

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<sup>13</sup> During this visit the Exiger team met with the University Administration, representatives of the UCPD, representatives of the Office of Safety and Reform, and the Community Advisory Counsel, members of the community at large, and student representatives.

## VII. Team Members

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Exiger assembled a seasoned group of highly respected law enforcement professionals and policy experts to work on the Review. The key team members include the following:

### **Jeff Schlanger – Project Lead; Team Lead: Review of Pedestrian and Traffic Stops**

As Project Lead for the University of Cincinnati, Mr. Schlanger was responsible for directly overseeing the designated team leads. Mr. Schlanger also served as the team lead for the Pedestrian and Traffic Stop component of the Review. Mr. Schlanger has more than 30 years of experience in law, prosecution, law enforcement, and, perhaps most critically, police department monitoring. Mr. Schlanger founded the Government Services practice at Kroll, and, as a subset of that practice, began, with William Bratton, consulting to major police departments around the world. Mr. Schlanger was instrumental in the design and execution of the monitoring methodology in Los Angeles, serving as the Deputy Primary Monitor for the LAPD consent decree, and has performed significant independent investigations at the request of large police departments throughout the country including the Tennessee Highway Patrol, the San Francisco Police Department, and the Austin Police Department. Significantly, Mr. Schlanger has served on the Executive Committee of the Working Group for National Guidelines for Monitors, developing the National Guidelines for Police Monitors. Before joining Exiger, he was Chief of Staff at the Manhattan District Attorney's Office, overseeing not only the day-to-day operations of New York's largest prosecutor's office, but also handling its "Extreme Collaboration" initiative with the NYPD. This included the funding, through forfeiture monies, of the mobility initiative for the NYPD. Mr. Schlanger continues to serve as a pro-bono advisor to NYPD Commissioner William Bratton and those within the NYPD working on the "re-engineering" of the Department.

### **Charles Ramsey – Team Lead: Review of Use of Force**

Commissioner Ramsey served as the team lead for the Use of Force component of the Review. A native of Chicago, Illinois, Commissioner Ramsey joined the Chicago Police Department in 1968, and served for 30 years, holding several prominent positions, including the Commander of the Narcotics Section, the Deputy Chief of the police force's Patrol Division, and eventually the Deputy Superintendent. From 1998 until 2006, Commissioner Ramsey served as the Chief of the MPDC in Washington DC, where he implemented programs that expanded community policing, and improved



MPDC's recruiting, hiring, and training standards. His eight-year tenure as Chief of the MPDC saw crime rates decline approximately 40%. In 2008, Commissioner Ramsey came out of retirement to become the Police Commissioner in Philadelphia, where he once again implemented a community-based approach to policing, and saw a marked decrease in city-wide homicides and violent crimes. In recent years, Commissioner Ramsey served as the

### **John Thomas – Team co-Lead: Review of Policies and Procedures**

is responsible for overseeing the management and control of over 280 officers responsible for the safety of members of the USC campus and surrounding community. Since his appointment and implementation of crime reduction and quality of life strategies in 2006, the campus community has experienced over a 70% decrease in overall violent crimes. Prior to his work at USC, Chief Thomas spent twenty-one years as a member of the LAPD where he retired at the rank of Lieutenant in December 2005. While with the LAPD, he worked in undercover narcotic enforcement as a member of the Department's FALCON (Focused Attack Linking Community Organizations and Neighborhoods) Unit for which he was awarded the City of Los Angeles' City Angel Award for Outstanding Community Enhancement and the Department's Meritorious Unit Citation. Chief Thomas is also a member of the International Association of Campus Law Enforcement Administrators (IACLEA), the Police Executive Research Forum (PERF), the International Association of Chiefs of Police (IACP) and the National Organization of Black Law Enforcement Executives (NOBLE).

### **Mark Porter – Team co-Lead: Review of Policies and Procedures**

campus policing. With over 30 years of experience in law enforcement management in the higher education field, Chief Porter has extensive knowledge and experience in strategic planning processes and community-based service models to enhance community safety, officer accountability, and police-citizen interactions. Chief Porter began his career as a patrol officer in the Northeastern University Public Safety Division, where he served for 14 years. From 1996 until 2005, Chief Porter served as the Chief of Police and Director of Public Safety at the University of Massachusetts-Dartmouth. Since 2005, Chief Porter has been the Executive Director of Public Safety and Chief of Police at Brown University, where he develops and oversees the implementation of policies including, in 2006, a comprehensive training program in response to the University's decision to issue firearms to officers. Chief Porter is a member of PERF, and in 2008 received a Distinguished Community Contribution Award from the NAACP.

**Beth Corriea – Team Lead: Review of all UCPD Data Collection Systems, Data Usage, Automation, and Records Management**

Beth Corriea served as the team lead for the Data Collection Systems component of the Review. Ms. Corriea is an attorney and consultant to police departments in the area of risk management. From January 2012 to January 2014, she served as the Department Risk Manager for the LAPD, having been appointed to the newly created position by the Chief of Police, Charlie Beck. As the Department Risk Manager, Ms. Corriea was part of the senior staff and a direct report to the Chief of Police, providing oversight, direction, and management for the various aspects of the LAPD's liability concerns, which includes the high-risk issue of use of force, and interfacing with the LAPD's Early Warning System ("TEAMS II"). Before her appointment to the LAPD, Ms. Corriea worked for the Los Angeles City Attorney's Office as a Deputy City Attorney from July 2005 to December 2011. Ms. Corriea was assigned to the LAPD Employment Litigation Section and became its supervisor in February 2010.

**Sandy Jo MacArthur – Team Lead: Review of Training**

Assistant Chief MacArthur served as the team lead for the Review of Training. Chief MacArthur had a career in policing spanning over 35 years of service with the LAPD. Her early assignments included Patrol, Vice, Special Problems Unit, Training, Ombudsperson, Press Relations and Risk Management. After being promoted to Captain and assigned to the Civil Rights Integrity Division, she was responsible for overseeing implementation of the requirements of the the 2001

federal Consent Decree and of all other department court settlements. In 2010, Chief MacArthur was promoted to the rank of Assistant Chief, director of the Office of Administrative Services. She managed a billion-dollar budget and led challenging LAPD initiatives including the State Diversity and Discrimination Training Programs, the Multi-Assault Counter Terrorism Action Capabilities (MACTAC) regional training program, and the redesign of the recruit training program by applying principles of adult learning theory and critical thinking skills. Also, in 2006, she established the LAPD Leadership Enhancement and Development Sessions (LEADS) training program that is conducted on a quarterly basis for LAPD Command Staff.

### **Patrick Harnett - Team Lead: Review of Accountability Mechanisms**

Chief Harnett served as the team lead in the review of Accountability Mechanisms. He began his career in law enforcement as a member of the NYPD where he remained for 32 years. During this time, he was responsible for implementing the NYPD's Crime Stoppers Hotline and commanding its Major Case Detective Squad. He also contributed to the evolving process of CompStat (s

After retiring from the NYPD, Chief Harnett worked as a consultant for New York State's Division of Criminal Justice Services implementing the CompStat process in the Buffalo, Niagara Falls, and Schenectady Police Departments. Chief Harnett also served as the Chief of Police in Hartford, Connecticut from June 2004 until July 2006. Since January of 2000, Chief Harnett has consulted as a police management and public safety expert conducting operational and organizational reviews of numerous public safety entities, including domestic municipal police departments, foreign police departments, and large university and municipal school systems. His reviews focused on assessing and enhancing existing agency organization and operations, as well as implementing specific action plans to improve management accountability at all levels while improving service delivery and reducing crime. He has worked with many municipal police departments including in Los Angeles, Detroit, Baltimore, Miami, Trenton, and Columbus, Ohio, as well as several University police forces including Brown University and the University of Chicago.

### **Nola M. Joyce - Team Lead: Review of Officer Recruitment, Hiring, Promotion, and Retention**

Deputy Commissioner Joyce served as the team lead on the recruitment, hiring, promotion and retention component of

the Review. She is nationally recognized as a leader in policing policy, research, and practice. She served for eight years as the Chief Administrative Officer and Chief of Staff of the MPDC, under Commissioner Ramsey. During her time with the MPDC, Commissioner Joyce exercised direct oversight over many of the department's most important divisions and was responsible for ensuring that all elements of the organization aligned their work with Commissioner Ramsey's vision for community-based policing. From 2008 until February of 2016, Commissioner Joyce served as the Deputy Commissioner of the PPD, directly under Commissioner Ramsey. She was the leader of the Organizational Services, Strategy and Innovation Unit within the PPD, which contains 1,142 employees and was responsible for all of the department's administrative, policy, research, technology, and training functions. From 1983 through 1993, Commissioner Joyce was the Manager of Budget, Planning and Research for the Illinois Department of Corrections, where she managed a half-a-billion dollar operating budget.

#### **Maggie Goodrich – Team Lead: Review of Technology**

team lead  
on the Technology component of the Review. She is currently the Chief Information Officer for the LAPD, where she manages a \$30 million annual technology budget, and is responsible for the management, oversight, and implementation of all technology for all facets of the police department, including patrol, administration, and special operations. She also manages the day-to-day operations of the IT Bureau, including directing staff who support a variety of IT functions. Prior to this, from 2006 through 2009, Chief Goodrich served as Commanding Officer for the Management Systems Reengineering Project, and was responsible for the development and implementation of all LAPD Training Evaluation and Management Systems (TEAMS II), which include: The Complaint Management System; the Use of Force System; the Officer Early Intervention System; and the Data Warehouse.

#### **Roberto A Villaseñor – Team Lead: Review of Equipment; Team Lead: Review of Encounters with Individuals with Mental Health Issues**

Chief Villaseñor served as the team lead on the Equipment and the Mental Health Issues components of the Review. He recently retired as the Chief of Police for the Tucson Police Department, where he was responsible for the leadership and management of over 1,400 employees, including over 1,000 sworn officers. Chief Villaseñor spent the entirety of his 35-year career in law enforcement as a member of the

Tucson Police Department. Chief Villaseñor served as Tucson's Assistant Chief of Police from March of 2000 until May of 2009, when he was appointed Chief. Because of his involvement in policing issues at a national level, in 2014 President Barack Obama appointed him to the President's Task Force on 21<sup>st</sup> Century Policing. In 2015, he was appointed to both the Department of Homeland Security Committee on Ethics and Integrity for Customs and Border Patrol, and the Arizona Criminal Justice Commission.

**James McShane - Team Lead: Community/Student Engagement, Problem-Oriented Policing, Campus Crime Prevention Tools**

Chief McShane served as the team lead in the review of (1) Community Engagement, Community-Oriented Policing, and Student Engagement; (2) Problem Solving, Problem-Oriented Policing, and Use of the SARA Model; and (3) Crime Prevention Tools, Practices, and Strategies. A 24-year veteran of the NYPD, Chief McShane began his career on patrol in the 52nd Precinct, eventually becoming the Commanding Officer of the Traffic Control Division. During this time, Chief McShane also received his Masters of Public Administration from Harvard University and his Juris Doctor from St. John's University School of Law. His career in campus policing began in January of 2004 when he joined the Department of Public Safety at Columbia University. Chief McShane is responsible for all elements of security and public safety at the three campuses of Columbia University, which house a total of 23,000 students, and is located in Upper Manhattan. He oversees all uniformed operations and investigations, and is responsible for security technology and access control. He commands a security force of more than 150 proprietary uniformed personnel and 200 contract guards, as well as a supervisory, investigative, and administrative team of fifty personnel.

**Joan Brody - Coordinator/Report Specialist**

Joan Brody served as a writer for the Review. Ms. Brody works with government and non-profit agencies on strategic planning and organizational assessment projects. Ms. Brody has also worked on project coordination tasks as well as writing and editing reports and policies and procedures manuals with parties involved in federal investigations and consent decrees. Ms. Brody has worked during the past 30 years with governors, mayors, police chiefs, sheriffs, district attorneys and other government and non-profit organization leaders. In 2008, she worked with William Bratton's consulting group on the University of Chicago Safety and Security Enhancement Project to conduct an assessment of the cam-

pus police department. She also has worked on similar projects for Brown University and the University of Southern California.

### **Elizabeth Carreño - Team Assistant on Several Areas of The Review**

Elizabeth Carreño

Ms Carreño has been a member of the USC Department of Public Safety, and currently serves as its Community Relations Manager, where she supervises student workers assigned to the Community Relations Office, as well as overseeing media relations and media operations. Prior to this she served as a Community Relations Officer, where she was involved in both event planning and educating students and the USC community about the resources afforded to them through the University. Ms. Carreño received her Bachelors of Science Degree in Criminal Justice from California State University in California.

## VIII. Substantive Areas of Inquiry

Our findings and recommendations relative to each of the substantive areas of inquiry contained in the RFP are detailed below. For the purposes of this report, we have reordered the areas of inquiry from the order presented in the RFP, and have collapsed the three areas involving community engagement, problem oriented policing, and crime prevention into one section.

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### A. Review of Pedestrian Stops and Traffic Stops

#### Introduction

Perhaps nothing is more central to the questions raised after the shooting death of Samuel DuBose than the efficacy and appropriateness of UCPD conducting on and off-campus vehicle stops as a crime reduction tool. Vehicle stops conducted within the bounds of applicable law have traditionally been utilized by police departments around the country not only for the promotion of traffic safety but also as a proactive method of crime fighting. Similarly, pedestrian stops have been used as a crime fighting tool. While potentially a valuable tool when used appropriately with proper supervision, the efficacy of vehicle and pedestrian stops as a crime fighting tool has, in some instances, come under criticism and has led to charges and, in at least one case, a judicial determination, of unconstitutional biased policing.<sup>14</sup> Further, such tactics have been viewed by some as “over-policing” that, when conducted in disadvantaged high-crime minority neighborhoods, leads to the arrests and convictions of residents of those neighborhoods for minor crimes that are committed in equal numbers in more-affluent, non-disadvantaged white neighborhoods.

From a best practices point of view, it is therefore essential, in order to ensure that traffic and pedestrian stops are being conducted constitutionally, that relevant data is collected, aggregated, and analyzed, and that appropriate field supervision is in place, before utilization of such stops as a crime fighting tool is considered. Even then, given the mission of the UCPD, the use of traffic stops as a method to fight crime is questionable, at best.

Some level of off-campus traffic stops have been occurring at UC since at least 1989, when the University and City first

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<sup>14</sup> See *Floyd v The City of New York*, 959 F. Supp. 2D 540. Specifically, in order to prohibit discriminatory conduct on the basis of race, color, ethnicity, national origin, gender, sexual orientation, or disability in the conduct of law enforcement activities, UCPD must by policy and supervision require that all stops and detentions, and activities following stops or detentions, by the UCPD be on the basis of legitimate, articulable reasons consistent with the standards of reasonable suspicion or probable cause. Race, color, ethnicity, or national origin may simply not be used in conducting stops or detentions, or activities following stops or detentions, except when officers are seeking one or more specific persons who have been identified or described in part by their engaging in appropriate suspect-specific activity to identify a particular person or group.

entered into a Mutual Aid agreement by MOU. That MOU was most recently renewed in 2010.<sup>15</sup> In November of 2014, however, the then-newly installed Chief began placing an unprecedented emphasis on traffic stops as a crime fighting tool.

In August of 2015, in response to the shooting of Samuel DuBose, UC, through the newly appointed Vice President for Safety and Reform, collected, analyzed, and released to the public, information regarding the number of stops that had historically been conducted along with the race of those being stopped. This data, previously available, but neither aggregated nor analyzed by UCPD, showed that for the one year period prior to the arrival of Chief Goodrich, stops were averaging 86.5 per month; subsequent to his arrival, stops were averaging 271.5 per month, a more than three-fold increase.<sup>16</sup> In fact, during the two months prior to the shooting death of Samuel DuBose, stops averaged an all-time high of 412 per month, an almost five-fold increase over the average before Chief Goodrich's arrival.<sup>17</sup> The undertaking of such a significant increase in traffic stops, coupled with the lack of data aggregation and analysis as well as the relative lack of field supervision and training, was, simply put, a recipe for disaster.

In fact, had the data been reviewed by the UCPD hierarchy, it would have shown that Officer Raymond Tensing, the officer involved in, and indicted for, the Samuel DuBose shooting, led the department not only in the number of stops and citations, but also in the racial disparity among those being stopped.<sup>18</sup> It would also have shown that vehicle pursuits had risen significantly with all of the concomitant dangers involved in such pursuits. Interestingly, however, while one might have expected an increase in civilian complaints as a result of the increased activity, the records maintained show no such increase. Whether this is a result of a poor complaint process or a testament to the way in which UCPD officers generally conducted themselves during traffic stops is unclear.<sup>19</sup>

Following the shooting of Samuel DuBose, the City of Cincinnati issued an Ordinance<sup>20</sup> seeking to revoke the traffic

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<sup>15</sup> See footnote 3.

<sup>16</sup> Covering the period of time from July 2013 through October 2014 versus November 2014 through June 2015 as compiled by UC.

<sup>17</sup> Covering the period of May and June 2015 as compiled by UC.

<sup>18</sup> These facts cannot, and should not be used to draw any conclusions relative to Officer Tensing's criminal or administrative responsibility in connection with the Samuel DuBose shooting.

<sup>19</sup> The infirmities of the complaint process are dealt with elsewhere in this report.

<sup>20</sup> Ordinance 264, Issued August 5, 2015.



enforcement terms of the MOU of 2010.<sup>21</sup> UCPD has been operating under the intent of that Ordinance and has essentially ceased all voluntary traffic stops off campus. While effectively stripped of its off-campus traffic enforcement power, UCPD has been left with all other police powers off-campus, including the ability to make misdemeanor and felony arrests and to issue citations for lesser, non-traffic, offenses. Interestingly, since the inception of the order in August of 2015, and a near-cessation of off-campus stops, off-campus crime has continued to fall.

Also, in response to the shooting, the University and UCPD took a number of steps in order to get systems into place that would allow for the appropriate collection and analysis of data relative to vehicle and pedestrian stops. Specifically, the department created a new Field Contact Card, replacing an inadequate prior form, and brought UCPD stop data into a database previously being developed under contract with UCPD by UC's Institute of Crime Science ("ICS").

The scope of this section is limited to providing findings and recommendations relative to vehicle and pedestrian stops engaged in by UCPD, and by extension some related issues involving biased policing. Excluded from the scope of this section is any determination as to whether biased policing was, in fact, being engaged in by any UCPD officers. While the disparity in race of those stopped by some officers is striking, for most officers the disparity was not as alarming. Determining whether the disparity, even where particularly striking, was the result of racial profiling or otherwise unconstitutional behavior on the part of UCPD officers, is difficult, at best, to do, and beyond the scope of this assessment. We can say, however, that our review did not uncover any indication that racial profiling, as such, was affirmatively promoted or suggested. That being said, we did find that the UCPD top leadership was willfully blind to the disparities of some officers and, by extension, indifferent to the potential existence of biased policing for which the disparity would have been a leading indicator.

## Findings and Recommendations

**Finding 1:** Prior to the shooting death of Samuel DuBose, traffic stops were being conducted in unprecedented numbers as part of the philosophy of the then newly installed Chief. The Chief failed to understand the potential implications of the initiative given the decision not to aggregate and analyze data on the nature and frequency of such stops.

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<sup>21</sup> There is a question as to whether the City Manager took the steps necessary to effectuate the Ordinance and revise the MOU of 2010 in accordance with its terms.

**Recommendation 1A:** Traffic and pedestrian stops should not be used by UCPD as a crime fighting tool. The potential benefit of such aggressive tactics in terms of crime reduction in the UC setting is modest at best and clearly outweighed by the negative perception of and feelings toward UCPD engendered by such tactics. Clear guidance by policy and procedure should be given as to how traffic stops should be conducted and when, if ever, off-campus traffic stops are permissible.

**Recommendation 1B:** Involuntary off-campus pedestrian and traffic stops should only be allowed when the officers possess reasonable suspicion to believe that a pedestrian or motorist is engaged in a criminal, non-driving offense.

**Recommendation 1C:** To the extent that that UCPD continues to make involuntary off-campus stops, the Office of Safety and Reform, must ensure that such stops are consistent with policy and must continue the collection, aggregation, and analysis of all relevant stop data. Regular meetings should be held among the Office of Safety and Reform, the Chief of Police, and the Director of Public Safety in which the analysis of such data is reviewed to determine whether there exist outlying officers in terms of number of vehicle and pedestrian stops or in terms of any racial disparities among those stopped.

**Recommendation 1D:** The University should consider equipping officers with tablets which among other things would enable the electronic capture of stop data through an electronic version of the Field Contact Card. The many other benefits of a mobility platform are discussed elsewhere in this report.

**Recommendation 1E:** Enhanced training should be given to officers on the risks and inherent dangers of traffic stops including appropriately dealing with individuals who are stopped.

**Finding 2:** UCPD did not, until very recently, have a policy on biased policing. Its new policy has not been fully implemented.

**Recommendation 2A:** UCPD should continue its full implementation of the recently enacted policy on biased policing. The implementation should include training and should ensure that UCPD officers not use

race, color, ethnicity, or national origin, to any extent or degree, in conducting stops or detentions, or activities following stops or detentions, except when engaging in appropriate suspect-specific activity to identify a particular person or group. The training and implementation should further ensure that even when UCPD officers are seeking one or more specific persons who have been identified or described in part by their race, color, ethnicity, or national origin, they may rely in part on race, color, ethnicity, or national origin only in combination with other appropriate identifying factors and may not give race, color, ethnicity, or national origin undue weight.<sup>22</sup>

**Recommendation 2B:** UCPD’s training on the biased policing policy should include training on implicit bias and such training shall be delivered both to new and existing members of the department. In-service training on the topic shall be developed and delivered annually.<sup>23</sup>

**Finding 3:** UCPD does not have a protocol for investigating complaints of biased policing.

**Recommendation 3A:** UCPD should develop and implement a protocol for the investigation of complaints of biased policing.

**Recommendation 3B:** UCPD should train any officers conducting investigations of complaints of biased policing on the protocol to be employed in such investigations.

**Recommendation 3C:** The Office of Safety and Reform should audit all investigations of complaints of biased policing to ensure that they are being conducted in accordance with established protocols for such investigations.

**Finding 4:** Both pedestrian and traffic stops have been anecdotally reported on occasion to be over-staffed, with multiple cars and officers responding to otherwise routine stops, which some members of the community described as giving them the impression that they were living in a police state.

**Recommendation 4A:** While officer safety must al-

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<sup>22</sup> UCPD is in the process of implementing a policy that is the result of training received in 2015 on fair and impartial policing.

<sup>23</sup> Following the shooting death of Samuel DuBose, UC and UCPD secured training in “Fair and Impartial Policing” from renowned expert Lorie Fridell. This was an important first step in combating implicit bias.

ways be a paramount consideration, the Office of Safety and Reform and UCPD should determine appropriate levels of response and enforce strategies, including polite explanation, to combat the negative perception created by enhanced response levels.

## Conclusion

Traffic and pedestrian stops carry inherent risks not only for the police officers conducting such stops, but also for police departments that are not attuned to the reputational and community-relations risks involved in decisions of how aggressively, if at all, to utilize such stops as a crime-fighting tool. The risks are significantly exacerbated when there are inadequate controls in place to monitor the activities of officers and a lack of adequate field supervision to ensure that any such activities are being performed in a constitutionally permissible manner. Even when such prophylactics are in place, the risk-reward quotient must be examined in the context of the mission of the department. Such examination in the case of UCPD leads to the conclusion that the undertaking of aggressive crime-fighting vehicle stops without any of the checks necessary to ensure constitutional un-biased policing, was a significant mistake. The recommendations made herein are designed to ensure that such a mistake does not occur in the future.

## B. Review of Use of Force

### Introduction

The use of deadly force against another person is the most serious act a police officer can take, and the degree of accountability of police departments for their uses of force, especially deadly force, is, perhaps, the greatest challenge facing law enforcement today. Accountability, in the context of use of force, has four essential pillars, the first of which is ensuring that appropriate policies and procedures governing the use of force are in place and comport with best practice. The second pillar requires these best practices to be imparted to every officer through extensive and appropriate training that best ensures that force will only be used when, and to the extent, necessary. The third pillar requires that each use of deadly force carries with it an impartial review as to whether that use of force comported with applicable policies and procedures. The last pillar requires that any use of force that is determined to be out of policy, must be remediated through appropriate re-training and/or discipline, up to, and including, termination. It is only through the conscientious application of these four pillars that police departments can hope to garner the trust of the communities they serve. Without trust, police agencies will lack the legitimacy so es-

sential for effective law enforcement.

In short, the public needs confidence that their police department values the life of each of its residents equally, will use deadly force only as a last option, and that if deadly force is ever misused that the system, both administrative and criminal, will deal with the transgression appropriately under the circumstances. In order to instill this confidence, each of the four pillars as they currently stand at UC will need to be reformed.

Exiger has conducted a review of both UCPD's current and prior use of force practices. In performing this review, Exiger has reviewed the relevant historical data, has conducted interviews and has reviewed relevant UCPD Policies and Procedures, Practices, Training, and Data. The intent was to arrive at findings and recommendations regarding the UCPD's use of force policies and practices, and relate these recommendations to the overall mission and goals of the UCPD, and to help the UCPD rebuild trust with the community.

## Findings and Recommendations

**Finding 1:** UCPD's Standard Operating Procedures (SOP) on Use of Firearms and Deadly Force (SOP 1.3.200) and Less Lethal Uses of Force (SOP 1.3.400) are insufficient. These procedures do not reflect current best practices and lack clarity regarding the circumstances under which the use of force is authorized.

**Recommendation 1A:** UCPD should combine SOP 1.3.200 and SOP 1.3.400 with its policies and procedures regarding Use of Force (SOP PE 05). This single Use of Force policy should cover both when force is permitted to be used as well as the resulting departmental investigation and review process.

**Recommendation 1B:** UCPD's new use of force policy should emphasize the following:

- a. The primary duty of all sworn personnel is to preserve human life and that whenever possible, de-escalation techniques shall be employed to safely gain voluntary compliance by a subject.
- b. In cases in which de-escalation is not safe, not feasible or not effective, only the reasonable force necessary to gain compliance, control or custody of a subject will be utilized.
- c. The most serious act in which a police officer can engage during the course of their

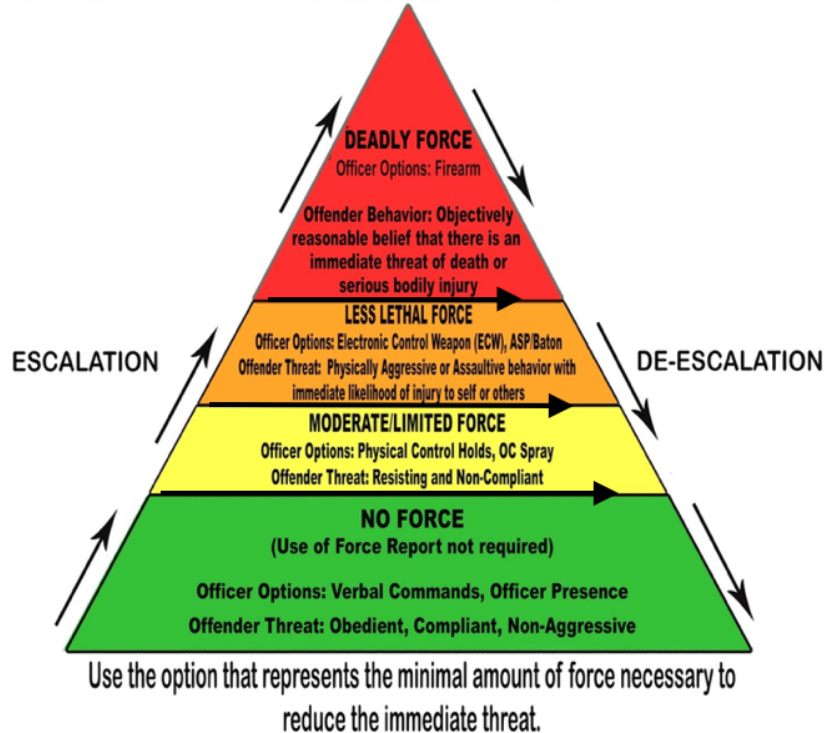
- official duties is the use of deadly force. The authority to carry and use firearms in the course of public service is an immense power, which comes with great responsibility.
- d. Deadly physical force will be used ONLY as an objectively reasonable last resort to protect the officer and/or others from serious physical injury or death.
  - e. An officer is not justified in using deadly force at any point in time when there is no longer an objectively reasonable belief that the suspect is dangerous, even if deadly force would have been justified at an earlier point in time.
  - f. When feasible under the circumstances, police officers will give the suspect a verbal warning before using deadly force.
  - g. Police officers using their professional judgment should not discharge their weapon when doing so might unnecessarily endanger bystanders.
  - h. Officers should be mindful when making use of force decisions that subjects may be physically or mentally incapable of responding to police commands due to a variety of circumstances including but not limited to alcohol or drugs, mental impairment, medical conditions, or language and cultural barriers.
  - i. After using deadly force, officers shall immediately render the appropriate medical aid and request further medical assistance for the subject.
  - j. In instances of obvious fatalities, appropriate respect shall be paid to the remains of the subject.
  - k. Officers who witness inappropriate or excessive force have a duty to report such violations to a supervisor and Internal Affairs.

**Recommendation 1C:** UCPD's use of force policy should define the following terms: Objectively Reasonable, Active Resistance, Passive Resistance, and Serious Bodily Injury.

**Recommendation 1D:** The UCPD should include a revised use of force continuum or critical decision making model in its use of force policy, which makes clear that the goal of force is to de-escalate any situation, and that only the minimal amount of force necessary should be used to overcome an immediate threat or to

effectuate an arrest. A chart showing an appropriate force continuum appears below:

## USE OF FORCE DECISION CHART



**Finding 2:** UCPD’s current use of force policies fail to list specific prohibitions relative to the use of deadly force by a sworn member of UCPD.

**Recommendation 2A:** The following prohibitions should be added to the revised SOP:

- a. Police officers shall not draw their firearms unless they reasonably believe there to be an immediate threat of serious bodily injury or death to themselves or another person.
- b. Police officers shall not discharge their firearms in defense of property.
- c. Police officers shall not use a firearm as a club.
- d. Police officers shall not fire warning shots under any circumstances.
- e. Police officers shall ensure their actions do not precipitate the use of deadly force by placing themselves or others in jeopardy by taking unnecessary, overly aggressive, or improper actions. It is often a tactically superior police procedure to withdraw, take cover or reposition, rather than the immedi-

- ate use of force.
- f. Police officers shall not discharge their firearms to subdue a fleeing individual who presents no immediate threat of death or serious physical injury to another person.
  - g. Police officers shall not discharge their firearms to subdue an individual who poses a threat only to him or herself.
  - h. Police officers shall not discharge their firearms from a moving vehicle unless the officers are being fired upon. Shooting accurately from a moving vehicle is extremely difficult and therefore, unlikely to successfully stop a threat of another person.
  - i. Police officers shall not discharge their firearms at a moving vehicle unless a person in the vehicle is immediately threatening the officer or another person with deadly force by means other than the vehicle (e.g., officers or civilians are being fired upon by the occupants of the vehicle).
  - j. A moving vehicle alone shall not presumptively constitute a threat that justifies an officer's use of deadly force.
  - k. Officers should not move into or remain in the path of a moving vehicle, and doing so is not justification for discharging a firearm at the vehicle or any of its occupants. An officer in the path of an approaching vehicle shall attempt to move to a position of safety rather than discharging a firearm at the vehicle.
  - l. Officers should never place themselves or another person in jeopardy in an attempt to stop a vehicle.
  - m. Barring exigent circumstances, (e.g., the driver is unconscious and the motor is still running), an officer shall never reach into an occupied vehicle in an attempt to shut off the engine or to recover evidence.
  - n. Police officers with revolvers shall not under any circumstances cock a firearm. Firearms must be fired double-action at all times.

**Finding 3:** UCPD does not have a clear policy statement governing the use of less lethal weapons.

**Recommendation 3A:** A clear policy statement governing the use of less-lethal weapons should be included in the revised use of force policy.



**Recommendation 3B:** The following definitions should be included in the revised policy to further enhance clarity: Arcing, Activation, Air Cartridge, Confetti Tags, Cycle, Display, Drive Stun, Duration, CED, Laser Painting, Probes, Probe Mode, Resistance, Active Resistance, Passive Resistance, Serious Bodily Injury, and Spark Test.

**Recommendation 3C:** A clear policy statement governing the use of Conducted Energy Devices (CEDs) should be included in the revised use of less-lethal weapons policy, and should include the following:

- a. A CED is classified as a less-lethal device. A CED is intended to provide a greater margin of safety for officers who might otherwise be forced to physically subdue a dangerous subject or as an alternative to deadly physical force where it would be otherwise legally permissible.
- b. A CED should only be used against persons who are actively physically resisting, exhibiting active physical aggression, or to prevent individuals from physically injuring themselves or other person(s) actually present.
- c. A CED should only be used in situations that allow for the use of physical force.
- d. Officers should issue an appropriate warning, consistent with personal safety, to the intended subject and other officers present prior to discharging the CED.
- e. When a CED is used against a subject it shall be for one standard discharge cycle, after which the officer should reassess the situation. Only the minimum number of cycles necessary should be used.
- f. When practical, the CED should be discharged at the subject's back, and avoid discharging it at an individual's head, neck, and chest.
- g. When possible, the CED should not be used on children, the elderly, obviously pregnant females, or against subjects operating or riding on any moving device or vehicle.

**Finding 4:** UCPD Directive PE 05 addresses the use of a device called a Kubotan.

**Recommendation 4A:** UCPD should consider banning the use of the Kubotan. Given the range of other less lethal options, the use of this somewhat obscure de-

vice is not necessary for UCPD.

**Finding 5:** There is currently no process in place to collect data relative to UCPD officers use of force in a consistent and timely manner.

**Recommendation 5A:** UCPD should establish a system for the collection, storage and retrieval of data regarding uses of force by members of the UCPD.

**Recommendation 5B:** UCPD should, to the extent possible, integrate such data into ARMS.

**Finding 6:** UCPD lacks a clearly defined method of investigating uses of force by its members.

**Recommendation 6A:** UCPD should establish a protocol for the timely review of every use of force to determine the appropriateness of such use of force from an administrative point of view and whether or not further investigation, including potential criminal investigation, or discipline is appropriate.

**Recommendation 6B:** Investigators assigned to investigate police uses of force should receive specialized training to ensure they understand UCPD policies and procedures and are capable of conducting thorough unbiased investigations.

**Recommendation 6C:** UCPD should engage an independent consultant to conduct any administrative investigation in cases of use of force resulting in death, officer involved shootings resulting in serious injury or death, or in-custody deaths.

**Recommendation 6D:** UCPD should allow CPD, or other appropriate state agency, to conduct any criminal investigation in cases of use of force resulting in death, officer involved shootings resulting in serious injury or death, or in-custody deaths.

**Recommendation 6E:** The identity of the officer(s) directly involved in the discharge of a firearm shall be released to the public within 72 hours except in cases where threats have been made toward the officer(s) involved or the department.

**Recommendation 6F:** UCPD should create a Use of Force Review Board (UFRB) to review all cases where members used deadly force or deployed a CED, or any incident that results in serious injury or death.

Cases for review will be presented by the Internal Affairs investigator or appropriate investigator from the Cincinnati Police Department who handled the case.

**Recommendation 6G:** The UFRB should be comprised of, at minimum, a high ranking member of UCPD appointed by the Chief of Police, a member appointed by the President of the University, a member of the student body, a patrol officer (or union representative), and a member of the neighboring University of Cincinnati community. The UFRB will (1) review investigative findings of cases involving designated uses of force by UCPD officers, whether or not an injury occurs; (2) make recommendations regarding disciplinary action or additional training of officers (the UCPD Chief should have the final determination of what discipline, if any, should be imposed); (3) make recommendations regarding any changes to use of force policy or training; and (4) create an annual report that contains an analysis of UCPD use of force data, that is disseminated internally and publicly.

**Recommendation 6H:** UCPD should make the findings of an Officer Involved Shooting (OIS) public upon completion of the investigation.

**Finding 7:** UCPD's current training on use of force is insufficient and inconsistent with the new standards created by the Ohio Collaborative Community Police Advisory Board.

**Recommendation 7A:** The UCPD should establish training to ensure all members of the department have a thorough understanding of the use of force policies and procedures.

**Finding 8:** UCPD does not currently employ realistic, scenario-based training.<sup>24</sup>

**Recommendation 8A:** Training for sworn personnel should be held twice annually to include live fire exercises and Reality Based Training (RBT). All training should emphasize de-escalation and sanctity of life.

**Recommendation 8B:** Crisis Intervention Team Training (CIT) should be a part of both basic recruit and in-service officer training.

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<sup>24</sup> UC is currently in the process of purchasing a product to address this.

## Conclusion

While the adoption of these recommendations will, along with other recommendations contained in this report, go a long way to reduce the unnecessary use of force, and thus build trust in the community, there can be no guarantee that despite best efforts, uses of deadly physical force will not occur. The hope is that if such uses of force do occur, the public believes that systems are in place to fairly and appropriately determine whether that use of force was justified and, when not, that the system will deal appropriately with the transgressor.

## C. Review of Policies and Procedures

### Introduction

Written policies and procedures define the roles and responsibilities of any police department and provide operating guidelines for the department's personnel. They inform personnel of what is expected of them and provide a basis for a disciplinary process dealing with transgressions of the rules. UCPD policies and procedures should be under continuous review by the Department and appropriate university staff, in order to ensure that they continue to represent best practice.

Over the course of February, March, and April of 2016, Exiger conducted a thorough examination of UCPD's policies and procedures. As a result, Exiger has made a series of findings and recommendations detailed in this section.

Exiger found that well before the arrival of our team, UCPD had recognized the need to revise and put greater control and emphasis on its policies and procedures. To this end, UCPD implemented a new electronic document management software system (PowerDMS) and in October 2015, hired an experienced manager as the new Organization Development Coordinator (Coordinator) to oversee the policy software system and to assist the Department with organizing and structuring their policies and procedures. According to our interview with the new Coordinator, this position is a direct report to the Chief of the UCPD, and geared to assist in the following areas:

- 1) Accreditation programming - as a primary function, leading the agency in acquiring accreditation

- 2) Policy development - assisting a team in developing policies and procedures.
- 3) Training development - assisting the department by working with others in developing career and promotional tracks.
- 4) Strategic planning - assisting with goals development and research.

These are critical tasks, and challenging ones. Shepherding a department through an accreditation process is, by itself, an arduous process requiring a significant amount of effort. However, as of the end of March of 2016, the Coordinator still did not have any additional staff to assist him in carrying out his mandate. Since his hiring, the Coordinator has been managing the new software system, and adjusting and revising several policies without any assistance.

The Exiger team reviewed policies and procedures from UCPD's PowerDMS SOP, which we understand to be the policies from which UCPD is currently operating. These policies are derived from an older CALEA model and indeed appear to have been adopted piecemeal without re-numbering the policies. The result not only is an inexplicable numbering system, but an indication to the reader of a lack of real understanding as to the import of the document. Not surprisingly given their genesis, most of the UCPD's policies reviewed did meet a best practice standard. There are several areas, however, that need improvements.

UCPD must customize its policies so that they are consistent with the university defined mission and the most modern thinking in policing today. In our review, we focused on high risk areas for campus law enforcement and assessed whether they were consistent with best practices in the profession. Note that the findings and recommendations directly related to subject matter areas that are covered in other sections of this report are not discussed below. For example, detailed findings and recommendations on Policies and Procedures related to Hiring, Traffic Stops, Use of Force, and Mental Health are discussed in great detail in other sections.

## Findings and Recommendations

**Finding 1:** UCPD lacks an effective process for developing and managing new policies and procedures, and reviewing and updating existing ones.

**Recommendation 1A:** UCPD should update its policies and procedures to reflect campus law enforcement best practices, and assign ongoing responsibility for ensuring that they are kept current.

**Recommendation 1B:** UCPD should establish a policy and procedure review committee consisting of a cross section of the UCPD and appropriate University resources to assist in updating and developing critical policies and procedures.

**Recommendation 1C:** Working with the newly hired Organization Development Coordinator, UCPD should fully implement the electronic document management software system which it has recently begun utilizing.

**Recommendation 1D:** The Coordinator should be provided with the resources and support necessary to meet the requirements of his position (clerical, special assignment from patrol, etc.), and to implement a critical but challenging agenda.

**Recommendation 1E:** UCPD should establish a procedure for the review of its policies and procedures by appropriate UC personnel including the Vice President for Safety and Reform, and the General Counsel or his/her designee.

**Finding 2:** Many of UCPD's policies and procedures are based on CALEA standards, and were adopted without being tailored to the specific needs of the UCPD.

**Recommendation 2A:** UCPD should establish adequate and consistent policies and procedures in several key critical areas including officer supervision and accountability, department transparency, effective diversity recruitment, and essential goal setting to develop community trust and partnership.

**Finding 3:** UCPD's policy on Field Interrogations (SOP 41.2.300) does not properly articulate the Constitutional basis for initiating field encounters.

**Recommendation 3A:** This policy should be rewritten to articulate the basic tenets of Constitutional policing, including that stops be based upon probable cause and reasonable suspicion criteria.

**Recommendation 3B:** UCPD should remove problematic verbiage such as "Persons not fitting the place, time or area."

**Recommendation 3C:** The procedure on when an officer can conduct a "pat down" for officer safety needs clarification.

**Finding 4:** UCPD's Trespass Warning (SOP 1.2.500) does not properly articulate the Constitutional basis for initiating trespass encounters.

**Recommendation 4A:** The warning should articulate tenets of Constitutional policing as the basis for initiating trespassing encounters and clearly articulate probable cause and reasonable suspicion.

**Recommendation 4B:** The policy should be revised, including the clarification of seemingly contradictory language suggesting both that UC is "public property," yet, "under the laws of Ohio, UC has the right to forbid a person to come onto this property."

**Finding 5:** UCPD's Collateral (Off-Duty) Employment policy (SOP 22.3.400) is incomplete and is not consistent with best practices.

**Recommendation 5A:** UCPD should consider limiting the number of off-duty hours officers can work to 20-30 hours in addition to their normal work week.

**Recommendation 5B:** UCPD should require that it approve any collateral employment to prevent conflict of interests between the primary employer and the agency hiring the officer for the off-duty employment.

**Finding 6:** UCPD's Bicycle Assignment & Maintenance policy (SOP 41.1.401), which allows officers to deploy bikes for both patrol and general transportation, is not consistent with best practices.

**Recommendation 6A:** UCPD should require that officers complete a police/public safety officers' bike course, and receive a certification prior to being allowed to deploy on a bicycle.

**Finding 7:** UCPD's policy on Unlawful Assemblies (SOP 46.1.300) addresses labor protests but does not address potentially unlawful student assemblies.

**Recommendation 7A:** This policy should include a section that addresses when student assemblies can and/or should be deemed unlawful.

**Finding 8:** UCPD's policy on Plain Clothes Detail (SOP 41.2.109), which addresses one of the most dangerous areas in law enforcement, is not detailed enough and is not consistent with best practices.

**Recommendation 8A:** UCPD should rewrite the policy to address issues such as supervisory oversight, notification protocols (UCPD and CPD), when plain clothes details may be utilized and collateral issues to plain clothes deployment.

**Finding 9:** UCPD's policy on Use and Control of Confidential Informants (SOP 42.2.900) is not consistent with best practices, and requires more inquiry.

**Recommendation 9A:** UCPD should, because of risk and perceptual concerns, consider prohibiting the use of Confidential Informants (CIs) except in extraordinary circumstances with clearance at the University reporting level.

**Finding 10:** UCPD's policy on Gangs (SOP 43.1.100) does not contain a number of crucial definitions and is not consistent with best practices.

**Recommendation 10A:** This policy should be rewritten to focus on what specific behaviors constitute a constitutional stop or other law enforcement encounter with a gang member, and to clarify what constitutes gang activity, and how an individual becomes classified as a known gang member.

**Finding 11:** UCPD's Active Shooter policy (SOP 46.1.10) is very general in its scope and not consistent with best practices.

**Recommendation 11A:** This policy should be revised so that the section on tactical responses is consistent with Multi-Assault Counter-Terrorism Capability (MACTAC).

**Finding 12:** UCPD's Bomb Threats policy (SOP 46.1.600) is not aligned with the current realities of today's terrorist bombers.

**Recommendation 12A:** UCPD should update this policy to incorporate the likely motivations of modern bomb threat callers and to ensure alignment with current realities of today's domestic and foreign terrorist bombers.



**Finding 13:** UCPD has historically made Clery<sup>25</sup> notifications for non-Clery-reportable off-campus crimes.

**Recommendation 13A:** UCPD should only make Clery notifications for reportable Clery incidents. Other crime data should be made available on the University's website.

**Finding 14:** UCPD does not currently have a dedicated Emergency Operations Center (EOC).

**Recommendation 14A:** UCPD, working with the Director of Emergency Management, should build out a dedicated EOC, designed to facilitate planning and response to both planned and unplanned campus events in coordination with other federal, state and local agencies.

## Conclusion

By reviewing and revising current policies and procedures, and putting in place a system for ongoing quality control, UCPD can ensure that it has an operating framework which is consistent with best practices for campus law enforcement while meeting the specific needs of this Department.

## D. Review of Officer Recruitment, Hiring, Promotion, and Retention

### Introduction

Any assessment of a police force's effectiveness must include a discussion of who the police are and how they were recruited, selected, promoted, and retained with a special attention to the issue of diversity. Diversity alone will not address the concerns of fair and impartial policing. However, having a police force that reflects the demographics of the population it serves will increase trust between the police department and the people it serves.

Unfortunately, for a variety of reasons, the UCPD force does not reflect the demographics of either the University community or its surrounding community. That being said, the new leadership of the Department has made a commitment to have its force better reflect the diversity of local demographics. When achieved, a more diverse Department will

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<sup>25</sup> The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act, signed in 1990, is a federal statute codified at [20 U.S.C. Sec 1092\(f\)](#), with implementing regulations in the [U.S. Code of Federal Regulations at 34 C.F.R. 668.46](#). The Clery Act requires all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their respective campuses. Compliance is monitored by the United States Department of Education, which can impose civil penalties up to \$35,000 per violation, against institutions for each infraction and can suspend institutions from participating in federal student financial aid programs.

accomplish several goals:

- increase trust between the community and the Department, and thus potentially ease any tensions caused from prior police-citizen encounters;
- produce a greater willingness by victims to report incidents and cooperate with the police in investigations;
- start building a police culture open to differences and more receptive to change; and
- open the pathway to a career and a decent income that was once closed for some.

It is for these reasons that the UCPD must recruit, hire, promote, and retain a more diverse workforce of both sworn and unsworn staff. Contained in this section are the findings on UCPD's current practices and recommendations to improve recruitment, hiring and promotion of diverse candidates.

As of April 1, 2016 the UCPD had an authorized strength of 74 sworn members. There is only one non-white officer, a male black patrol officer. Only eight of the 74 members are females. All sworn command ranks, lieutenants and higher, are filled by white males.

UCPD expanded its force through a hiring campaign that started in April 2014. By June 2014, 11 officers were hired, 11 more were added in September of 2014, and another 12 were hired in February 2015. This hiring campaign did not increase the number of non-whites on the UCPD. In fact, during this same time period UCPD lost three non-white officers resulting in smaller numbers in the non-white category in 2016 (2 non-white officers)<sup>26</sup> than in 2013 (5 non-white officers).

A baseline often used to determine if a police department's diversity is acceptable is comparing it to the demographics of the population it serves. The table below provides the demographics of the city of Cincinnati, the neighborhoods where UCPD patrols, the undergraduate student body at the University of Cincinnati, and the faculty at the University.

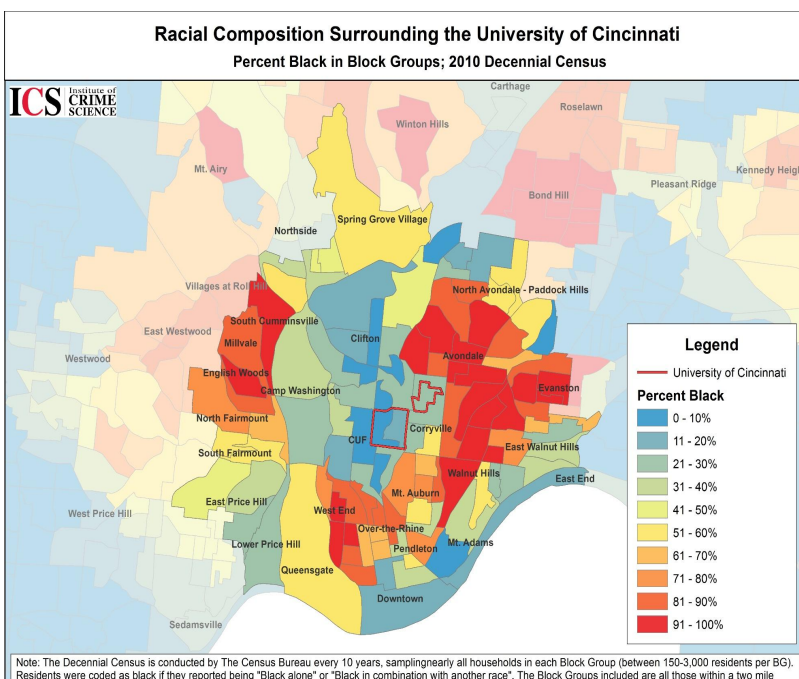
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<sup>26</sup> One of the two non-white sworn members of the Department, a Captain, resigned during the pendency of Exiger's assignment in order to become the Chief of another university police department.

AREA	DEMOGRAPHICS OF AREA BY PERCENTAGE		
	White	Black	Other
UCPD	97.0%	1.5%	1.5%
University Students	68.9%	8.4%	22.7%
University Faculty	71.6%	15.2%	13.2%
Clifton	72.1%	16.8%	11.1%
CUF	73.6%	14.9%	11.5%
Avondale	7.5%	91.1%	1.4%
Corryville	49.1%	36.1%	14.8%
Mt Auburn	29.6%	65.9%	4.5%

**Table 1: Percentage of Racial Population by Area.**

The map below also illustrates the racial make-up of the areas surrounding the University. Although there is not agreement as to what extent a police department should reflect the community it serves, certainly UCPD’s demographic makeup must become more diverse. The demographics of UCPD at 97 percent white do not adequately reflect the demographics of the population it serves.



In an attempt to understand what led to the lack of diversity at UCPD, Exiger examined a review of UCPD 2014-2015 Hiring Process,<sup>27</sup> including the job-advertising sources that were used in the last three hiring efforts. To determine the impact of the various advertising methods, the Exiger Team examined aggregate data from each of the three hiring waves. The results are shown in the table below.

<sup>27</sup> Review of UCPD 2014-2015 Hiring Process. Robin S. Engel, Ph.D. (2016).

Hiring Wave	Number of Applicants	Percent of White, Male Applicants	Number of Days Posted	Number of Applicants / per Day
1	95	71%	16	6
2	159	78%	23	7
3	99	68%	14	7

**Table 2: Effectiveness of Each Hiring Wave**

The first hiring wave used CareerBuilder, Cincinnati Herald, and Ohio Association of Chiefs of Police Web Site. The announcement was opened for sixteen days resulting in 95 applicants. Wave 2 produced 159 applicants but it was open for twenty-three days. A ratio of the number of applicants per day was calculated to produce a standardized measure. The first wave produced six applicants per day compared to seven produced in waves 2 and 3. Another measure is the percentage of white, male applicants. Wave 2 produced the highest percentage of white males at 78 percent compared to Wave 3 with 68 percent. It is difficult to draw clean conclusions based on the aggregate data examined but it does suggest that the use of CareerBuilder did add to greater diversity.

Poor record keeping makes it difficult to determine potential problematic approaches and barriers associated with the current policy, beyond the now eliminated academy pre-certification requirement discussed below. According to UCPD, data collected at each stage of the process is limited.

In any event, only 9.6% of the 353 applicants during the 2014 and 2015 hiring waves were recommended for hire. The outcome by race is noteworthy. 32 (12%) of the 274 white applicants were recommended for hire as compared to only two of the 48 black applicants (4.2%). None of the 18 applicants from the 'other' races category were recommended for hiring.

The hiring process reduces the pool of eligible candidates. Our research found that just over 67%<sup>28</sup> of applicants, 239 in total, met the minimum qualifications. The minimum qualifications were: (1) being OPOTC Certified; (2) being 21 years of age or older; and (3) having a valid Ohio driver's license. Meeting these minimum qualifications allowed the candidate to move on to the next stage of the process. It was at the next stage that a further reduction of candidates occurred. The next round of the hiring process had additional require-

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<sup>28</sup> Of the 353 applicants, Human Resources at UC determined that 114 did not meet the minimum requirements yielding a 67.7% qualifying rate. This held true for both black and white applicants; for other non-white candidates the figure was 58%.

ments, including passing: (1) a physical agility test; (2) a written test; (3) a background investigation (criminal and traffic background record check and references); (4) a polygraph; (5) a psychological exam; and (6) a formal interview.<sup>29</sup> Failure to pass any of these additional tests eliminated the candidate.

While 37.8% of the white candidates passed the written and agility tests, only 21.2% of the black candidates did so. The data did not differentiate between results for the two tests, however, based on anecdotal information, a larger number of black candidates failed to continue in the process after the two tests.<sup>30</sup>

74 of the 353 (79 non-white and 274 white) applicants were considered 'eligible' and made it to the interview stage: only six of the 79 (8%) non-white applicants advanced compared with 68 of the 274 (24.8%) white applicants. Of those candidates, three (4.4%) of the white candidates, two of the black candidates and two of the "other" candidates (together 66.6%) dropped out before the interview stage. At the end of the hiring process, only 2 of 79 non-white applicants and 32 of the 274 were recommended for hire. Non-whites had a 97% failure rate compared to an 88% failure rate for white applications.

It is important, going forward, for UCPD to be as granular as possible in understanding the dropout at each stage of the process. Understanding why applicants fail or withdraw will help to target the recruiting process and enable the UCPD to provide support mechanisms for the applicants. For example, suppose that applicants are dropping out because they believe that they cannot pass the agility test; in that case, UCPD can offer free sessions, coaching applicants on the requisite exercises.

Many police agencies are setting up ways to help applicants make their way through the hiring process. This may be something as simple as maintaining contact with the applicant, answering questions, or providing reassurance and suggestions on preparing for the tests and reviews. More and more, agencies are providing information to the applicant about the process and how to prepare. For example, the Philadelphia Police Department has a video about the agility test and how to perform and prepare for the test. They offer

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<sup>29</sup> Dr. Engel (2016) reports that the background investigation is administered by UCPD investigative lieutenants and includes contacting current and past employers, contacting all references, investigating social media, in-home interview, and other background resources available to the lieutenants. Tri-State Polygraph administered the polygraph exam. Dr. James Daum, a consultant, conducted the psychosocial evaluation.

<sup>30</sup> The agility exam is modeled after the OPOTC standards and is administered by the UC Public Safety. See Engel Report, 2016

opportunities for applicants to come out and work with a trainer. The CPD provides a detailed document about their process including how to take the written test. A promising candidate does not have to be excluded from employment because of a deficiency that could be corrected with some work.<sup>31</sup>

Since the 1970s, police departments have used a screening process very similar to UCPD's process. This process is focused more on 'selecting out' candidates as opposed to 'selecting in' candidates. The process is aimed at finding flaws in a candidate that "disqualifies" him/her from continuing on in the hiring process. As community policing became a predominant policing model, some police executives recognized the need for a shift in hiring practices, with a greater emphasis placed on selecting officers with the skills to engage the community in proactive problem solving.<sup>32</sup>

As part of this review, and at the request of UCPD, the Exiger team considered a Public Safety Diversity Plan, submitted by Directors Whalen and Baker. The Public Safety Diversity Plan consists of short and long term hiring plans, a recruitment advertising proposal, and an entry level examination proposal.

Importantly, the plan seeks to target recruits from three pools. First, the draft hiring plan outlined recruiting from the diverse pool of UCPD Security Officers. Not only does this provide a career path for security officers, which will help to improve the quality of those positions, it also allows the Department to identify successful police officer candidates from among those security officers whose work ethic and judgment has already been observed and evaluated. Several security officers have completed a police academy and others have expressed interest in going into an academy.

UCPD will use a streamlined version of the hiring process for experienced UCPD Security Officers. The applicant will be exempt from normal qualifying tests given his/her experience and working knowledge. These applicants are still required, however, to have a home interview, polygraph, psychological examination, panel interview, and a final interview with the Director of Public Safety. This streamlined process allows UCPD to bring Security Officers on board more quickly than other applicants.

Second, the Diversity Plan includes recruiting officers from other agencies. The value of hiring experienced officers is obvious. Unfortunately, experience can also bring cynicism

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<sup>31</sup> Albert & Kohlhepp, 2010

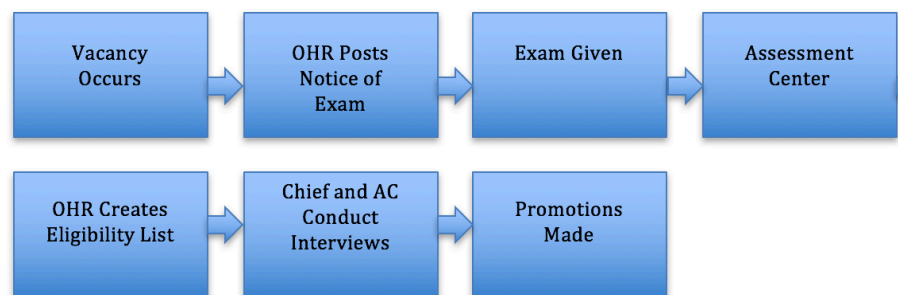
<sup>32</sup> Wilson, Dalton, Scheer, & Grammich, 2010

and poor work habits. Thus, UCPD must be careful in selecting only those experienced officers possessing the right values and service orientation.

Third, the plan includes relaxing the OPOTC certification requirement for some diverse candidates interested in becoming a police officer and sponsoring them to attend an academy. We understand from the Plan that UCPD has already created an apprentice officer position to hire external candidates who lack certification, and sponsor them to attend an academy full-time.

As part of our review Exiger also examined the UCPD's promotional process. UCPD follows a standard promotional process which is used by the vast majority of police departments, and is illustrated in Figure 3:

**FIGURE 3: Promotional Process:**



Although, by policy,<sup>33</sup> this process was set for promotion to Lieutenant, this same process was used in the recent promotion of sergeants. The promotional process for the Captain rank used to require a written test, but now consists of panel interviews with members of student safety board, university executives, and UCPD members.

By policy a Notice of Promotional Exam is posted by the Office of Human Resources (OHR) and is distributed by e-mail or posted on electronic bulletin boards for at least ten days, and contains a description of the position including job duties, working hours, special qualifications required, name and rank of supervisor, and location of reporting and working. The FOP contract clearly states that it is the sole right and responsibility of UCPD to develop, administer, and evaluate all promotional examinations, assessments, and testing procedures.<sup>34</sup> Examinations are required to be developed by either an independent testing service or OHR.

The FOP contract also details the scoring process to be em-

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<sup>33</sup> SOP 34.1.100

<sup>34</sup> University of Cincinnati and FOP, Ohio Labor Council, 2014, p. 19

ployed in evaluating candidates for promotion. The written exam is scored with a maximum total of 100 points. College degrees can provide two additional points for an associate degree and five additional points for a bachelor degree. Military credit can provide an additional four points. The candidate must score at least 70% on the written exam to move on to the assessment center phase. The final score is weighted as: written exam, military credit and college credit is worth 20%, the interview is worth 30%, and the assessment center is worth 50%. The promotion selection must be made from the top three employees.<sup>35</sup>

The weighting of these factors is by design skewed, with the assessment center carrying the greatest weight and when added to the Chief's interview amounting to 80% of the total score. This weighting gives UCPD flexibility in focusing these components on identifying the desired traits in a supervisor, rather than rigidly focusing on an examination.

Exiger also assessed UCPD's ability to retain its employees, and found that UCPD's attrition rate from the period of January 1, 2014 to January 25, 2016 was excessive. There was no information provided that would enable us to make any specific findings regarding the causes of the high attrition rate. However, we can offer some possible explanations for consideration.

A total of 12 officers left UCPD between January 1, 2014 and January 25, 2016.<sup>36</sup> This attrition occurred during three hiring waves, which makes determining the denominator of the ratio of attrition to total officers difficult. At a minimum, however, this represents a significant rate of attrition. Turnover is not always a negative as it allows for new people and ideas to enter the department, and can rid the department of poor performers. That being said, there is a cost to turnover and the loss of experienced personnel can adversely affect operations.

As indicated, there has been no reliable data collected relative to employees leaving the Department. Employees also may leave agencies because of organizational dysfunction, poor supervision, and leadership. The high turnover of Chiefs and Interim Chiefs, the lack of first line supervisors, and organizational dysfunction detailed in this report may have all contributed to the high turnover rate for the past few years. Additionally, opportunities for policing in more active municipal environments may also be a factor in the attrition rate for the Department. Going forward, the Department should make every effort to understand the reasons for individuals

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<sup>35</sup> University of Cincinnati and FOP, Ohio Labor Council, 2014, p. 20

<sup>36</sup> Engel, 2016



leaving the Department.

With regard to staffing, of the 74 authorized sworn positions in UCPD, there are 50 Uniform Law Enforcement Officer (ULEO) positions. While a simple analysis of “calls for service” might indicate that a lesser number of sworn officers could suffice, we believe that 74 authorized positions is an appropriate staffing level given the size of the University, the open-campus nature of the university, the satellite facilities requiring police services, the mandate to patrol the off-campus surrounding community, and the specialty assignments that we have recommended in this report.

Lastly, Exiger reviewed compensation for members of the Department. It appears that the salary and benefits package of UCPD is competitive with other agencies at the base salary for police officers, but diminishes in competitiveness at the higher ranks of the Department due to both base pay disparity and overtime eligibility.<sup>37</sup>

The UCPD has created a career ladder for police officers by establishing ULEO1, ULEO2, and ULEO3. Movement up the ladder requires a minimum time in the prior position plus a set number of training hours above the required training. Once an officer attains the position of ULEO3, he/she must move in rank in order to progress financially. As noted above, UCPD recently added sergeant positions, which offers another rung in the career ladder. One major advantage in terms of compensation is that UCPD also offers tuition reimbursement and remission for spouses, domestic partners, and dependents. Utilized correctly, this generous benefit can provide advantages in recruiting and retention.

## Findings and Recommendations

**Finding 1:** UCPD’s written policies and procedures for hiring do not prioritize the need to establish a police officer candidate pool that is representative of the diverse community it serves.

**Recommendation 1A:** UCPD should update its hiring policy by requiring a diverse slate of candidates throughout the police officer recruitment process.

**Recommendation 1B:** UCPD should consider partnering with well-established minority groups who will share and forward the UCPD’s recruitment advertise-

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<sup>37</sup> The entry salary for a UCPD Law Enforcement Officer Apprentice is \$44,221 and a University Law Enforcement III top salary is \$62,213. This is competitive with the CPD salary range of \$42,572 to \$60,330. With respect to captains, a UCPD captain earns \$81,600 with no overtime allowed versus average earnings of \$112,000 for CPD captains who do earn overtime pay.

ments to a much broader community network.

**Finding 2:** The absence of a clear UCPD mission and strong employer brand impedes recruitment and hiring efforts.

**Recommendation 2A:** UCPD should work with their officers, student population, and community members to craft a UCPD mission statement that clearly states the reason that UCPD exists, describes what UCPD does, and reflects its basic philosophy.

**Recommendation 2B:** UCPD should develop a strong employer brand that will contribute to its becoming the law enforcement employer of choice in Cincinnati and the region.

**Finding 3:** UCPD's past recruitment efforts have been limited and lacked effective strategies to establish an appropriate officer candidate pool that was representative of the diverse community it serves.

**Recommendation 3A:** UCPD should expand their search for police officer candidates by partnering with well-established groups to assist with sharing and forwarding the Department's recruitment advertisement to a much broader community network.

**Recommendation 3B:** In addition to enhancing the all-around recruitment effort, UCPD should target all groups including women, Hispanic, Asian, African American, and LGBTQ both in the community and on campus.

**Recommendation 3C:** UCPD should increase recruitment efforts among the more diverse pool of UCPD campus security officers and other University employees who serve in different campus departments who have demonstrated commendable performance and good judgment.

**Recommendation 3D:** UCPD should ensure that recruitment campaigns reflect UCPD's commitment to diversifying the Department and market such values as community engagement, partnerships, and shared responsibility for crime prevention.

**Recommendation 3E:** UCPD should leverage its family tuition payment program, in an attempt to bring seasoned, diverse, and mission-appropriate candidates into the recruitment mix.

**Finding 4:** There is an SOP which governs the hiring process for police and security officers but none that covers recruitment.

**Recommendation 4A:** UCPD should revise and update the Department's current recruitment policy to a true best practice recruitment plan that acknowledges the need for diversity and sets diversity of applicants as a goal.

**Finding 5:** While the advertising component of the new Diversity Plan appropriately expands on previously limited recruiting efforts and puts forward new approaches that have the potential to expand the diversity of the applicant pool, there are some additional steps that should be considered.

**Recommendation 5A:** UCPD should explore the adoption of the Community Collaboration Model for recruitment and consider consulting with the Hartford Police Department on their experience with the model.

**Recommendation 5B:** UCPD should ensure that recruitment outreach is inclusive of all on and off campus communities including the LGBTQ community.

**Recommendation 5C:** UCPD should carefully select and train officers who attend recruiting events like career fairs.

**Recommendation 5D:** UCPD should establish recruitment ambassadors, comprised of University staff, students, and community members, who will work independently and with officers to help recruit applicants.

**Recommendation 5E:** UCPD should work toward making recruitment part of UCPD officers' regular interactions with the community.

**Finding 6:** While UCPD's recent decision to no longer require candidates to be pre-certified as police officers along with its decision not to give special consideration to candidates who have already completed the academy are critical steps toward increasing the diversity of the applicant pool, the plan can be enhanced.

**Recommendation 6A:** UCPD should track the performance of former Security Officers to assess any impact of the streamlined hiring process.

**Recommendation 6B:** UCPD should use lateral and retired officers only after it has carefully screened those

candidates to ensure that their qualifications and background are consistent with the mission and philosophy of UCPD.

**Recommendation 6C:** UCPD should consider a relocation bonus for qualified and appropriate lateral hires.

**Recommendation 6D:** UCPD should build a process whereby Cincinnati residents who are at the beginning of a career, as well as those that might be in transition from a previous career and whose career aspirations are consistent with the mission and philosophy of UCPD, are given priority for sponsorship to a police academy.

**Recommendation 6E:** UCPD should actively work with local high schools to identify and work with young people who may aspire to a career consistent with the UCPD mission and philosophy.

**Recommendation 6F:** UCPD should consider creating a UCPD Police Cadet program and a student intern program.

**Recommendation 6G:** UCPD should consider offering a free Candidate Applicant Preparation Program (CAPP).

**Finding 7:** Poor record keeping makes it difficult to determine potential problematic approaches and barriers associated with the current policy, beyond the proposed elimination of academy pre-certification requirement.

**Recommendation 7A:** UCPD should ensure that the annual evaluation process proposed in the Diversity Plan include the collection of data at every step, test, and exclusion point in the hiring process, including those who voluntarily drop out of the process. UCPD should use this data, as well as data regarding actual hires and feedback from new hires, to continuously improve the hiring process.

**Finding 8:** While the Diversity Plan proposes a re-engineering of the hiring process, including improved data keeping, contracting out of entry-level testing, and a re-ordering of the process which on its face looks appropriate, there are certain items for consideration that could enhance the proposed plan further.

**Recommendation 8A:** UCPD should consider developing and providing support mechanisms for all appli-

cants to reduce the number of no shows and failures.

**Recommendation 8B:** UCPD should ensure that the proposed suitability assessments of the applicants to the agency is tailored to the UCPD mission statement.

**Recommendation 8C:** UCPD should ensure that where the candidate has previous law enforcement experience, the background investigation should include inquiry into the candidate's use of force training, and any history of use of force, civilian complaints, or discipline.

**Recommendation 8D:** The Plan utilizes a panel interview conducted by UCPD/external stakeholders. While an assessment center approach offers benefits, a diverse interview panel is acceptable.

**Recommendation 8E:** UCPD and relevant stakeholders should review the process to be used by the contractor, confirm that it has been tested for bias and is aligned with the UCPD mission and philosophy.

**Finding 9:** While UCPD follows a standard promotional process, there appears to be no definition of the desired qualities for each supervisor position consistent with the mission and philosophy of the Department.

**Recommendation 9A:** UCPD should define the desired traits and qualifications for a supervisor, consistent with the mission and philosophy of the Department, and those traits and qualifications should be reflected in assessment center exercises, interview questions and scoring protocol.

**Finding 10:** Current procedures for review of promotion decisions and the promotion/ career development process are inadequate.

**Recommendation 10A:** UCPD should ensure that as required by the current SOP, the process for promotion is evaluated annually by the Chief, Assistant Chief, and Lieutenants. Additionally, UCPD should consider annual review of both the promotion and career development process by both the Chief and the Director of Public Safety.

**Finding 11:** Current interviews and assessment center process do not include participation from the student body and community.

**Recommendation 11A:** UCPD should use students and community members in the assessment center exercises and in the interview processes.

**Finding 12:** Current policies and procedures do not contemplate the recently established supervisory position of sergeant.

**Recommendation 12A:** UCPD should update its promotional policies and procedures to reflect the position of sergeant.

**Finding 13:** Despite UCPD's salary and benefits package being competitive with other law enforcement agencies in the area, there was an excessive attrition rate from the period of January 1, 2014 to January 25, 2016.

**Recommendation 13A:** An appropriate turnover/attrition metric should be identified with deviations from the expected rate yielding increased attention to potential issues.

**Recommendation 13B:** Enhance recruitment and hiring process to ensure that candidates have the right expectations and are the right fit for the job.

**Recommendation 13C:** Conduct, maintain, and analyze exit interviews in order to better understand any deviations from the expected attrition rate.

## Conclusion

UCPD has recognized the need to re-engineer its recruitment and hiring practices in order for the police force to reflect the demographics of the communities it serves and meet the demands of policing in an urban university setting. It has taken key first steps in that direction. Building on those efforts, as recommended in this section, will best position the Department to recruit, hire, promote, and retain qualified officers who meet these essential goals.

## E. Review of Training

### Introduction

Twenty-First Century policing demands a highly agile, well-trained workforce that can manage a vast array of problems from community quality of life issues to violent crime and beyond. Today's officers must be problem solvers with critical thinking and community relations skills, just as much as they need to be proficient at the traditional abilities required of a patrol officer. These skills will only be developed

through sound training and education beginning at the academy and continuing throughout their careers.

A police department must have a clear mission and vision, and an articulable set of values that all employees should know and be able to actualize. The mission, vision, and values should be supported at all levels of the organization and be the foundation from which a training curriculum is developed.

Our review of UCPD training identified a number of critical deficiencies in policies, procedures, and practices. The recommendations presented below provide a roadmap to a re-engineered training function that can effectively prepare officers for the complex challenges of their role.

The UCPD Training Unit (TU) is led by a lieutenant (TU Lieutenant) who is responsible for oversight of all of the UCPD training. The TU Lieutenant is also tasked with numerous other responsibilities such as recruiting, hiring, and promotions. Without proper support, it is difficult for the TU Lieutenant to focus on and to thoroughly exercise proper command oversight of the training program.

The TU Lieutenant should have full knowledge and oversight of all training budget information and staffing allocations in order to be able to budget both on-site and off-site training. The Exiger team found that in the past, the TU Lieutenant was not always provided this critical management and budget information.

The TU Lieutenant is responsible for ensuring that all new police officer hires have attended a State certified academy prior to hire, schedules police and security officers for their mandatory orientation training, and maintains files to track all training information for all UCPD employees. Exiger team members reviewed excel spread sheets that track annual training. In 2015, all but one individual tenured officer attended the mandatory four hours of training required by the State of Ohio.<sup>38</sup> Further review indicated that all employees met or exceeded the minimum UCPD requirement of 20 hours of in-service training for the year. There was little information in the 2015 spreadsheet regarding the specific training courses the employees had completed. However, in 2016 the new TU Lieutenant began to document all in-service training attended by each employee. This is an improvement from prior years.

There were several deficiencies noted in command oversight

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<sup>38</sup> The number of mandatory hours was increased to 11 hours for the calendar year 2016 by 109.803 of the Ohio Revised Code (OIC)

of training. The Training Procedures (SOP 33.5.100) require all training to be reviewed and approved by the TU Lieutenant and by a training committee to ensure that training goals are reasonable as assessed by stakeholders. The Exiger team saw no evidence, however, that training has been reviewed by the TU Lieutenant over the past several years. There is no training committee and the TU Lieutenant was not aware of the existence of any training committee during his 15-year tenure with UCPD.

Also, according to the SOP, the TU Lieutenant is primarily responsible for the administrative side of training, including approving the courses and tracking attendance by UCPD employees. There is no evidence that the TU Lieutenant attended training for the purpose of oversight of the training being presented.

The current TU Lieutenant was appointed in late 2015 and immediately began the process of organizing training files, which were previously maintained in an antiquated record keeping system. There were no files, a lack of documented curricula, and few lesson plans had been formally developed. Employee training records were not adequately kept and as such it was difficult to track what training any individual employee had attended.

Furthermore, in assessing a training program, it is important to consider the actual training environment to ensure it is creating opportunity for students to learn and grow. The facilities provided by an agency send a message to its employees about the extent to which training is valued by the organization. In this regard, the message sent to UCPD officers is not reassuring.

UCPD officers are not trained at any of the available quality classrooms on the University's campus. Rather, the UCPD training site is located several miles from the campus in a warehouse facility with missing, broken, and/or water stained ceiling tiles, old plastic tables, and uncomfortable chairs, none of which make for an effective learning environment. There is a large mat room with some equipment available to teach skills such as defensive tactics and baton techniques. Notably, the equipment was purchased by the defensive tactics instructor and not by the University or the UCPD. The square footage of the two training rooms is adequate; however, the location is dilapidated and suggests a lack of support for training from the top leadership of both the University and UCPD. Finally, the main office for the TU is housed at the warehouse training site, making the entire unit isolated from the rest of the UCPD.



OPOTC standards for training are out of the hands of UCPD; that said, Ohio has taken recent measures to improve the basic training framework for officers. In 2015, Ohio Governor Kasich created a Task Force to address the fractured relationships that existed between some communities and law enforcement agencies.<sup>39</sup> The Task Force reviewed the OPOTC standards for both recruit and in-service training. The Task Force recommended many changes to Ohio laws and regulations to improve training standards for all police officers. One recommendation was to increase the number of hours required in the basic training academy curriculum to be more consistent with best practices; Ohio requires only 605 hours of basic training, less than bellwether states California (664), New York (649), and Texas (618). Recommendations specific to training include dealing with juveniles, people with mental health issues, recognizing personal biases, police-community relations and simulated shoot/no-shoot and other scenarios. These additions are in line with best practices and will assist UCPD in the development of new officers.

In addition to the basic academy training, which meets the aforementioned OPOTC standards, UCPD requires all new hires (police and security officers) to attend an 80-hour in-house orientation course where UCPD instructors teach the following topics:

- Defensive tactics
- Firearms and firearms qualification
- Communications and professional standards
- Campus familiarization
- Rules of conduct
- Defensive driving
- Radio and Mobile Digital Computer communications
- Title IX
- Lesbian Gay Bisexual Transgender Questioning (LGBTQ)
- Body cameras
- HAZMAT safety
- Fire safety
- Use of Force
- Investigations
- Standard Operating Policies and Procedures

The Exiger team agrees that these are important subjects that should be taught by an agency to ensure new hires understand agency policy and procedures, and to set the tone from the top. However, there are several critical areas that appear to be missing from the orientation training such as community relations and the Clery Act. Additionally, training should be delivered on the mission, vision, and values of

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<sup>39</sup> Ohio Task Force On Community-Police Relations, Final Report, April 29, 2015.

UCPD. Our review found an absence of classes for both police officers and security officers on several areas including community-police relations, building partnerships with communities both on and off campus, interacting with persons with mental illness, substance abuse, date rape, leadership, critical thinking, and problem solving.

Furthermore, the Exiger Team found that the UCPD is exposed to risk due to the irregular orientation training schedule. Because of the sporadic hiring schedule and the small number of new hires entering employment at UCPD at any given time, orientation training is not scheduled until there are enough new hires for a full class. Therefore, new hires may wait six months or more before attending the orientation classes. During the interim, the untrained new hires work in patrol functions.

As for continuing education, the UCPD currently requires all police and security officers to attend 20 hours of continuing education annually, nine hours more than the current State mandate. While the quantity of training required of all UCPD employees is sufficient, there is no assurance that the training an officer attends is consistent with UCPD policies, or with the mission, vision, and values of the University or the UCPD.

The majority of continuing education training for all employees is conducted off-site, and is led by third-party instructors, not UCPD personnel. According to SOP Number 33.5.100, Training Procedures, training may be conducted while off-duty and at the employee's expense. Some continuing education training opportunities are found in the UCPD training calendar, but most are found by the individual employee through their own research. All supervisors have access to the training calendar, which is maintained by the TU Lieutenant. Employees may request training through their supervisor or be assigned to training by the TU Lieutenant. Once employee training requests are approved by the supervisor, the request is forwarded to the TU Lieutenant for final approval at which time the employee is notified via Department email. Unfortunately, numerous employee requests for outside training go unfulfilled; requests are often held up at the initial supervisory approval level, with approval only obtained after the date the training was scheduled to occur.

There was no in-service training for police or security officers scheduled during the site visit, nor any scheduled prior to the completion of this report. However, the team identified several deficiencies in the quality of training. Training delivery currently is left to the decision of each individual instructor at UCPD. Since there are no lesson plans to evaluate, or

training to observe, there was no way to conclusively determine the training delivery methodologies used by instructors. The Exiger team found that much of the training was in lecture format, and based on instructor experience and limited outside instructor training. Defensive training classes did include some scenarios and role playing. However, lesson plans were not available to establish whether this is a requirement in the delivery of the materials or if it is left solely to the discretion of the instructor. Furthermore, the TU Lieutenant expressed frustration over the lack of readily available historical training information.

Currently, UCPD instructors are not required to attend a certified instructor development course. The State of Ohio offers an 80-hour instructor development course that instructs on adult learning modalities, curriculum and lesson plan development, and facilitation skills. A review of this instructor development course curriculum revealed that it is consistent with best practices. To the best of the TU Lieutenant's knowledge, no UCPD instructor other than himself has attended this course or is scheduled to attend this course in the future.

There is no identifiable process in which UCPD training curricula is developed. Three knowledge domains should drive the development of curriculum: Cognitive, Affective, and Psychomotor. Course objectives should be developed so that students are aware of the level to which the agency will expect the student to perform. UCPD training contains no clear statement of the mission, vision, and values of UCPD which is needed to set a foundation from which to build all training curricula.

There is no indication that adult learning methodology is consistently applied in courses at UCPD. Adults learn best in a hands-on setting where it is safe to make mistakes and learn from them in a controlled environment. Adults need to link new learning to past experiences to ensure development. Through problem-solving, scenario-based training, table top exercises and role play, students have the opportunity to apply what is presented in the course and instructors are able to assess and make corrections in the moment. Understanding that officers come to training with varying degrees of knowledge, skills, and experience, adult-learning techniques allow the instructor to acknowledge experience and build upon it. Trainers should recognize that students learn from each other in the process, which makes for a rich learning environment.

Topics and skills taught in all in-service training classes appear to be taught in isolation of one another. There does not

appear to be any integration of topics such as community relations within use of force course, or unique campus life issues within the defensive tactics course. Integrating topics is a more relevant, realistic and effective way of training and developing employees.

Finally, establishing a *lessons learned* program to aid in the development of quality police training curriculum is a best practice.<sup>40</sup> Such a program is helpful for ensuring that employees understand where prior efforts have fallen short and that can help develop a roadmap for change/improvement so that the agency learns from, and does not repeat, mistakes. Currently the TU Lieutenant is not required or allowed to review all use of force reports, internal complaint investigations, and law suits to identify lesson learned and infuse those lessons into training curricula.

Based upon a review of available training materials, the UCPD-led training does not appear to properly prepare the police and security officers to police in a large university and in urban areas. Further there does not appear to be training directed toward effective interactions with diverse populations. Campus police and security officers must be able to move seamlessly from handling a traditional campus security concern such as a burglary from a motor vehicle to an active shooter incident. Police and security officers must know their roles and be trained to the unique characteristics of university campus life. This can only be accomplished through a strong and well-articulated mission, vision, and values statement from the agency and training developed to accomplish the mission. All courses taught by UCPD instructors are attended by both police and security officers with the exception of firearms training. This is a best practice so that each understands their role in policing and security.

## Findings and Recommendations

**Finding 1:** Training Policies and Procedures are generic and out dated and do not meet the needs of UCPD.

**Recommendation 1A:** UCPD should draft and adopt consistent policies and procedures for the development and approval of all UCPD courses and ensure that all such courses are consistent with the mission and philosophy of the department.

**Recommendation 1B:** UCPD should ensure appropriate oversight of outside training to ensure it is consistent with the Department mission, vision, and values.

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<sup>40</sup> Training the 21<sup>st</sup> Century Police Officer, RAND Report, August 31, 2003.

**Recommendation 1C:** UCPD should require proper tracking, and evaluation of all courses and instructors.

**Recommendation 1D:** UCPD should require instructors to attend a certified instructor development course.

**Recommendation 1E:** UCPD should ensure training is consistent with officer tasks and competencies to successfully serve in an urban and campus environment.

**Recommendation 1F:** UCPD should establish and maintain a “lessons learned” program.

**Recommendation 1G:** UCPD should establish a Training Committee responsible for review of training policies and procedures, curricula development, and course delivery.

**Recommendation 1H:** UCPD should ensure that training opportunities are available to all employees both sworn and unsworn.

**Finding 2:** Current training-related facilities are inadequate.

**Recommendation 2A:** UC and UCPD should locate the training office within headquarters and create a state of the art on-campus learning environment by identifying a professional setting for in-service training.

**Finding 3:** New hires may wait six months or more before attending the 80-hour UCPD orientation class during which time they will be working in patrol functions.

**Recommendation 3A:** UCPD should develop a portion of the 80-hour class in an e-learning format, to be delivered immediately upon swearing in, so as to allow for appropriate orientation before the commencement of patrol functions. At a minimum, this should include orientation as to the mission and philosophy of the UCPD, a primer on problems unique to campus policing, Use of Force policies and procedures, an introduction to community relations, and diversity training.

**Finding 4:** Several critical areas appear to be missing from the orientation training such as community relations, the Clery Act, and a statement of mission, vision, and values of UCPD. It is unlikely that the 80-hours of training provide sufficient time to cover the additional subjects that new hires should receive.

**Recommendation 4A:** Develop introductory curricula, with time allotment and method of delivery (e-learning versus classroom) for inclusion in orientation training; curricula should include the Clery Act; mission, vision, and values of UCPD; and community relations.

**Finding 5:** Based upon a review of available materials, specialized and in-service training does not appear to properly prepare police and security officers to police in a large university and in urban areas or adequately train toward effective interactions with diverse populations.

**Recommendation 5A:** UCPD should design courses to specifically meet their unique training needs, including courses addressing the unique intersection of urban and university policing, and training designed to promote effective interactions with diverse populations.

**Finding 6:** UCPD does not conduct an annual review of training or formal needs assessment process with regard to orientation or continuing in-service training.

**Recommendation 6A:** Build on the recommendations of this report relative to needs assessment and conduct a formal review of training, to be repeated on an annual basis.

**Recommendation 6B:** Develop an annual training plan consisting of goals and strategy based on an annual formal needs assessment, with input from the Chief of Police, a training committee comprised of appropriate UCPD personnel, training unit officer-in-charge, as well as input from community and feedback from other officers and supervisors.

**Finding 7:** While the hours of mandatory in-service training required of all UCPD employees (16 hours beyond the 2015 State mandated training and 9 hours beyond the new 2016 requirement) is sufficient, additional training time would be beneficial.

**Recommendation 7A:** Develop as part of the annual training plan a mandatory training curriculum in modular format, to be reviewed and modified annually, including the state-mandated training as well as those courses which are determined to be best suited for UCPD-mandated annual training.

**Recommendation 7B:** The curriculum developed

should be infused with elements of community policing, including a clear and unified message as to the UCPD's commitment to community policing, as well as with critical thinking and problem solving skills training throughout.

**Recommendation 7C:** Develop a series of elective courses in different relevant subject matter areas all of which would have to be completed over a three-year period.

**Recommendation 7D:** UCPD should initially consider courses for the mandatory training that include updates on trends and innovations in both municipal and university policing, an update on Ohio criminal law, a use of force update including de-escalation techniques, community and problem solving policing updates, and anti-bias training.

**Recommendation 7E:** Elective courses should include (titles included here would be advanced extensions of any mandated course with similar subject matter):

- a. Community-police relations
- b. Traffic stops
- c. Constitutional use of force
- d. Building partnerships with communities both on and off campus
- e. Critical thinking and problem solving
- f. Ethics and Integrity
- g. Human trafficking
- h. Diversity
- i. Biased policing
- j. Substance Abuse
- k. Date rape
- l. Leadership
- m. De-escalation skills through the perishable skills training (defensive tactics, firearms, driving and communication skills)
- n. Equal Employment Opportunity
- o. Interactions with persons with mental illness

**Recommendation 7F:** Determine the appropriate split of total mandatory annual training hours between mandatory and elective courses. This would not preclude additional approved specialized training offered by UCPD or outside agencies or entities.

**Recommendation 7G:** Increase diversity and biased policing training and require these subjects to be recurrent training annually.

**Recommendation 7H:** Records of all training should be centralized and maintained in an electronic format which becomes part of an Officer's personnel package.

**Finding 8:** There is no identifiable process by which UCPD training curricula is developed.

**Recommendation 8A:** UCPD, working with the University should develop a process by which it develops its curricula.

**Finding 9:** There currently is no lessons-learned program by which the Department can embark on a path of continuous improvement.

**Recommendation 9A:** Establish a lessons learned program, derived from UCPD uses of force, post-incident debriefings, employee suggestions, personnel complaints and case law updates, which would inform 1) the development and modification of policy and procedures, 2) the creation of tactical concepts and 3) the development and modification of training curriculum.

**Finding 10:** While the UCPD Field Training Program is a sound structure and commonly used throughout the country, the core success of any Field Training Program is based on the quality of the FTO for which UCPD does not have a written selection protocol.

**Recommendation 10A:** Develop a list of tasks and skill competencies expected of an FTO.

**Recommendation 10B:** Create a selection process to assess whether an applicant has the skills necessary to train new officers.

**Recommendation 10C:** Ensure that all FTO's support the Mission, Vision, and Values of UCPD and will be a strong role model for new employees.

**Recommendation 10D:** Ensure that the selection process includes a detailed review of the disciplinary and merit file of the candidate.

**Recommendation 10E:** Ensure that there is a policy that requires a timely suitability review of any FTO in



the case of a sustained complaint involving that FTO.

**Finding 11:** Currently, instructors at UCPD are not required to attend an OPOTC Certified instructor development course.

**Recommendation 11A:** Require instructors to be OPOTC Certified Instructors.

**Finding 12:** Training delivery currently is left to the discretion of each individual instructor at UCPD. There is no standard requirement that the training include role play, scenarios or table top exercises and no indication that adult learning methodology is consistently applied.

**Recommendation 12A:** Require all courses taught by UCPD instructors to have written lesson plans that include clearly stated, realistic performance objectives and learning activities that utilize multiple learning modalities.

**Recommendation 12B:** Base the training approach on the tenets of adult education, promoting decision-making and critical thinking.

**Recommendation 12C:** Develop problem-based scenarios and case studies that allow the student to apply problem solving skills & knowledge of diverse populations.

**Recommendation 12D:** Require curriculum review before a class is taught.

**Recommendation 12E:** Observe instructors and rate performance.

**Recommendation 12F:** Survey students confidentially relative to the performance of their instructor and adequacy of training generally.

**Finding 13:** There does not appear to be any integration of topics such as community relations within use of force courses, or unique campus life issues within the defensive tactics course.

**Recommendation 13A:** UCPD should ensure that community relations issues are included in use of force courses and that unique campus life issues are included in the defensive tactics course.

**Finding 14:** The majority of continuing education training for all employees is conducted off-site, by non-UCPD instructors

and without any requirement that the curricula be reviewed or approved by UCPD or that officers who attend such training bring a copy of the syllabus back for their training files.

**Recommendation 14A:** UCPD should require by policy that all non-UCPD training be reviewed and approved prior to authorizing attendance at such program, and that a syllabus of such training be obtained for inclusion in the attending employee's file.

**Finding 15:** There are serious deficiencies noted in command oversight of training including: the lack of a Training Committee (despite it being named in the SOP); the lack of review (or available evidence of review) of course curricula by the TU Lieutenant or Training Committee; the lack of an annual Continuing Education Plan and Learning Needs Assessment; and the lack of oversight over outside training.

**Recommendation 15A:** UCPD should ensure that the TU Lieutenant is devoted primarily, if not exclusively to all of the tasks attendant to training and should determine whether additional assistance is required.

**Recommendation 15B:** UCPD should re-establish the Training Review Committee under the direction of the TU Lieutenant and include a member from the University and two members from the community.

**Recommendation 15C:** UCPD should ensure that an annual Continuing Education Plan and Learning Needs Assessment is conducted.

**Recommendation 15D:** UCPD should review, approve, and maintain the curriculum of every outside course approved for attendance by a UCPD officer.

**Finding 16:** The Training Unit lacks basic management practices including: the lack of creation, maintenance and retention of curriculum, expanded course outlines, and/or lesson plans for courses; best practice templates for the design and evaluation of training; and regular course assessments.

**Recommendation 16A:** UCPD should obtain a Learning Management System (LMS) (or utilize the University's LMS *Blackboard* if appropriate) to track all training records, retain expanded course outlines and lesson plans, allow for automated employee training requests and approvals.

**Recommendation 16B:** UCPD should use best practice templates to design training, and evaluate training de-

livery and instructors.

**Recommendation 16C:** UCPD should complete regular assessments of courses and training delivery and ensure that curricula include relevant and realistic officer tasks and competencies.

**Recommendation 16D:** To ensure consistency with UCPD policies, procedures, practices and agency mission, vision, and values, UCPD should assure that the TU Lieutenant approve all internal courses and lesson plans, and outside courses prior to allowing employees to attend.

**Finding 17:** The Training Unit lacks an identified budget.

**Recommendation 17A:** UCPD should identify the actual training budget for equipment and off-site training each year and hold the Department accountable for working within its training budget.

**Finding 18:** There appears to be no control over the selection of instructors or ongoing evaluation of their performance.

**Recommendation 18A:** UCPD should work with the University to develop a policy with respect to the selection of instructors and for the evaluation of their performance.

**Finding 19:** There is no policy that requires the TU Lieutenant to attend training for the purpose of oversight of the training being presented.

**Recommendation 19A:** UCPD should develop a policy which charges the TU Lieutenant with mandatory attendance (either by himself or an appropriate designee) of training so that he can evaluate its effectiveness in writing.

**Finding 20:** The UCPD has essentially no collaboration with the University in the area of training.

**Recommendation 20A:** UCPD should extensively collaborate with the University on issues of training and should consider the creation of a Community-Police Academy for surrounding communities and a Student Community-Police Academy for campus communities.

**Finding 21:** The UCPD has little collaboration with the CPD in the area of training.

**Recommendation 21A:** UCPD should consider collaborating with CPD on issues of training.

**Finding 22:** The UCPD currently has a basic OPOTC-certified Police Academy located on its Clermont Campus which is unused by UCPD.

**Recommendation 22A:** UCPD should consider utilizing the Clermont Campus OPOTC-certified Police Academy as its own internal academy where UCPD sponsored/hired cadets could attend.

## Conclusion

Training can be an important catalyst to bring about change within an organization. It is a necessary element to drive change and institutionalize it within an organization. The basic tenets are present for the UCPD to create a state of the art training program for police and security officers. The UCPD is housed on a university campus and has the ability to interact with a state certified academy housed on a separate campus. The current TU Lieutenant has been educated on instructor development and curriculum design, and has the desire to shift training at UCPD into a 21<sup>st</sup> Century model. However, creating a state of the art training program will only be accomplished through the support of the University and Public Safety leadership. Both must make training a priority, provide the proper support and communicate this focus through words, policy, and action.

## F. Review of Accountability Mechanisms

### Introduction

The mechanisms in place to ensure that the obligations and responsibilities of each individual in a police organization are understood and adhered to, and that deviations from those obligations and responsibilities are appropriately dealt with, are a foundational requirement of any modern police department. These mechanisms include appropriate supervision and spans of control, a system to detect and deal with potentially at-risk officers, a disciplinary system that deals with alleged transgressions of policies and procedures in a fair and consistent manner, and an inspectional system designed to uncover deviations from policies and procedures. In some cases, where a police organization is in need of significant reform, a temporary external entity is also necessary to ensure that all remediation efforts are being implemented in a timely and effective manner.

With regard to supervision and span of control, the need for strong leaders and supervisors throughout the chain of

command cannot be overstated. Every individual in the organization must know who their immediate supervisor is, and what their performance expectations are. Perhaps most important, however, is that first line supervision of patrol officers usually provided by sergeants in most police agencies, be adequate and appropriate.

Until recently, there were no sergeant positions in the UCPD. Instead, each platoon was staffed by two lieutenants. In theory, this arrangement provided that there would always be at least one lieutenant working. However, that was not always the case, given vacations and illness, among other things. On those occasions when there was no lieutenant working, one of the police officers on duty was designated as the officer in charge. Because there were two lieutenants assigned to each shift, neither was clearly the shift commander and it was reported that officers often received confusing and conflicting directives from their supervisors. In essence, there was no consistency or clarity in first line supervision, and, in fact, an individual officer's supervisor one day could be his or her supervisee the next.

Simply put, this lack of adequate supervision was dangerous and completely unacceptable. This failure became even more egregious when the UCPD doubled its numbers and increased its role off-campus. These changes required greater oversight and supervision, given the young and inexperienced new members of the Department who were engaging in relatively high-risk municipal policing.

Despite the expanded responsibilities of the patrol force, no sergeant positions were created until 2015. The present organization chart shows two sergeant positions and one lieutenant position for each of the three patrol squads. This is a significant improvement because it establishes one commander per tour (the lieutenant) who can provide leadership and clear direction to the sergeants and officers assigned to them. The Exiger team has been informed that UCPD has now filled two vacant sergeant positions so that each watch will have a lieutenant and two sergeants.

An Early Warning System (EWS) is another component of a fulsome approach to accountability. The University has recognized the need for an EWS. In April 2015, the University undertook a first step in implementation of such a system with the purchase of the Guardian software, the full installation of which was completed in September of 2015. Exiger has made recommendations with respect to the EWS. For the purpose of this section of the report, it is important to understand that the EWS is a vital part of the overall accountability ecosystem serving to collect and analyze dis-

parate data with the hope of early identification of an officer whose behavior is such that he or she may be at risk of serious future actions or policy violations. In cases where the identification of such an officer is made, appropriate intervention, pursuant to an established protocol, is required.

While the Early Warning System is designed to identify potentially at risk officers through an analysis of various aspects of their police work, which may include complaints, the complaint process deals with the actual alleged transgressions of policies and procedures by an officer. How a police agency accepts, records, and investigates complaints that are reported from any source, be it from citizens or from within the department, is another measure of the maturity of accountability within a police department.

Exiger reviewed the complaint process within the department and found it to be in disarray. First, there was an absence of leadership. Although a captain had been assigned to act as the leader of the Professional Standards function, the designated captain had recently resigned. A lieutenant was in the process of being appointed to the position.

Second, the Exiger team was unable to review any complaint and/or report of investigation files for the last six years or even a log of the complaints. The complaint and investigation files should contain details on the date and time a complaint was received, the identity of the officer(s) involved, the nature of the complaint, and the name of the supervisor assigned to the investigation. The file should also document all the investigative steps taken to prove or disprove the allegations that were made against an officer(s). These folders should also include notifications that were made to the chief and others including the FOP. Exiger did not undertake an independent review of any of the individual complaint files; the files were secured inside a locked drawer of a file cabinet in a locked office. The Exiger team did review disposition reports which were provided as part of our document request. In most of the disposition reports that were reviewed, no disciplinary action was taken. However, in a few instances, written counseling was recommended.

UCPD is required by policy to maintain a log of complaints (SOP 52.1.100). The log should contain the date and time the complaint was received, the identity of the officer(s) involved, the nature of the complaint, the name of the supervisor assigned to investigate the complaint, the result of the investigation, and the ultimate disposition of the complaint. The Exiger Team was informed that UCPD had not maintained a log for at least the last six years.

With regard to investigations of complaints, best practice requires that complaints be investigated fully and fairly in a timely manner. After investigation, the complaint must be adjudicated as being “sustained,” “unfounded,” “not resolved,” or “exonerated.” In cases where a complaint is sustained, there must be a determination of appropriate response by the Department, ranging from “no discipline,” “remedial training,” “loss of pay,” “suspension,” or “termination.” The decision of what constitutes appropriate discipline in any situation should lie with the Chief of the Department. That being said, the review of an investigation, its adjudication, and a recommended penalty in cases of sustained complaints, can, and we recommend should, involve civilians drawn from the community.

The Exiger team also found a lack of any operational audit function. A strong system of accountability should include an audit function, serving to ensure that the systems that are in place are operating as expected and in conformity with best practice. Ideally, this unit should report (by at least dotted line) to the Vice President for the Officer of Safety and Reform. The unit should have an annual audit plan that calls for examination of each of the critical areas of operation in the Department. Personnel assigned to this unit should undergo specific training and certification.

Until the audit function described above is properly and fully established in the Department, and because of the number and nature of the reforms recommended in this report as being necessary to bring the Department into compliance with best practices, the undertaking of a voluntary independent monitorship is recommended to ensure that such reforms are appropriately implemented according to an agreed upon schedule, and that the Board of Trustees and public is apprised of the progress of reform. The independent monitor would initially work with the Department to determine which recommendations the University agrees with implementing, the timeline for implementation of those recommendations, and the measure by which the success of implementation will be assessed. Thereafter, the Independent Monitor would report to the Board of Trustees and the public on the progress of reforms.

## **Findings and Recommendations**

**Finding 1:** UCPD’s level of supervision has been seriously inadequate, but the recent creation and filling of sergeant positions and realignment of lieutenant positions are much needed organizational improvements.

**Recommendation 1A:** Each of the three patrol shifts

should be made up of two squads of officers, with each squad having a permanently assigned sergeant who works the same rotating schedules as their officers.

**Recommendation 1B:** The Organization chart should be redesigned and comprised of sub charts showing Field Operations and Support Services in greater detail. The Organization chart should also be updated to reflect latest personnel changes, including each squad sergeant and the officers assigned to the squad.

**Recommendation 1C:** A comprehensive review of the patrol chart should be conducted to determine if it deploys the patrol force and the supervisors in the most effective manner.

**Finding 2:** UCPD uses Guardian Tracking, a tracking and management software program designed to assist supervisors in their duties of documenting and monitoring their subordinate employee's performance.

**Recommendation 2A:** UCPD should integrate aspects of the Guardian system with the ICS data system in order to build a comprehensive EWS.

**Finding 3:** Despite the requirement that written statements of the duties and responsibilities of each specific position be maintained, there appears to be no current listing of duties and responsibilities for Sergeants and Lieutenants other than a general listing of duties for persons seeking the promotion/position.

**Recommendation 3A:** UCPD should develop a list of critical duties and responsibilities for these positions.

**Recommendation 3B:** UCPD should consider requiring that patrol sergeants perform documented visits, preferably in the field, to each subordinate during their shift.

**Finding 4:** Despite SOP 35.1.100 requiring regular performance evaluations, and supervisor-employee meetings to discuss the evaluation, some officers reported that they had not been evaluated in a few years, and that evaluations had been forwarded by computer.

**Recommendation 4A:** UCPD should implement a quality control process to ensure compliance with the performance evaluation requirements, and incorporate related duties on the list of supervisor responsibilities.



**Finding 5:** UCPD policies with respect to complaint receipt, investigation, and disposition are inadequate.

**Recommendation 5A:** UCPD should draft Complaint Initiation Policies and Procedures that (a) call out the different methods of initiating/receiving complaints (by mail, telephone, fax or email and via the UCPD website); (b) allow for the receipt of anonymous complaints; (c) provide for walk-in complaints at UCPD headquarters; (d) prohibits any attempt to dissuade an individual from filing a complaint; (e) requires appropriate notification from UC General Counsel anytime a lawsuit alleging police misconduct is filed; (f) requires notification to UCPD by any officer who is arrested or otherwise criminally charged or the subject of a lawsuit that alleges physical violence, threats of physical violence or domestic violence; (g) requires officers to report the misconduct of other officers including improper use or threatened use of force, false arrest, unlawful search or seizure, or perjury; and (h) allows for the processing of internally generated complaints.

**Recommendation 5B:** UCPD should draft Complaint Investigation Policies and Procedures that (a) requires the categorization of complaints; (b) defines the workflow of the different categories of complaints from investigation to adjudication; (c) provides time frames for the investigative process; and (d) establishes complaint investigation protocols. The revised SOP should provide for confidentiality to the extent otherwise permissible where disclosure would compromise the investigation.

**Recommendation 5C:** UCPD should draft Complaint Adjudication Policies and Procedures that (a) set forth the standard of proof; (b) prohibits automatic credibility preference being given to an officer's recitation of facts; (c) defines the categories of potential disposition; (d) and, sets the timeframe in which adjudication should be completed.

**Finding 6:** UCPD does not maintain a complaint log as is required in the Internal Affairs policy (SOP 52.1.100).

**Recommendation 6A:** Complaint information should be compiled into a simple database, which can be accessed by the ICS system, and should include fields for: the sequential number of that complaint in that year, date complaint received, nature of the com-

plaint, employee who is the subject of the complaint, the supervisor assigned to investigate the complaint, disposition, and date investigation completed.

**Finding 7:** No brochures about the complaint process or complaint forms were observed in UCPD public spaces.

**Recommendation 7A:** UCPD should develop brochures, in hard copy and for inclusion on UCPD's website, about the complaint process and complaint forms and make such materials available and include as a requirement in a new SOP governing civilian complaints.

**Finding 8:** There is no complaint review process by any outside civilian entity.

**Recommendation 8A:** UCPD should consider establishing a subgroup of the Community Advisory Council to review the department's investigation of complaints made against UCPD employees.

**Finding 9:** The UCPD disciplinary process is governed by the FOP contract and there appears to be no governing SOP.

**Recommendation 9A:** A separate SOP should be created detailing how disciplinary matters should be handled by UCPD. Such a procedure should include creating a form that summarizes details of an allegation of misconduct and creates a log listing the number of the issue starting at 001 of year and including the name of the employee, the dereliction charged, the name of the supervisor reporting and/or investigating the matter, and the date adjudicated.

**Finding 10:** There is no inspection or operational audit function within the Department.

**Recommendation 10A:** UCPD should consider establishing an Inspectional Services or Audit unit, reporting directly to the Vice President for Public Safety and Reform.

**Finding 11:** There is no provision for an on-going outside independent assessor of the state of reforms of the UCPD.

**Recommendation 11A:** UCPD should consider entering into a voluntary independent monitorship which would provide regular status updates to the Board of Trustees and the public relative to the progression of reform within the Department.

## Conclusion

In recent years UCPD's level of supervision and other accountability systems have been seriously inadequate. Recent efforts such as enhancements to the supervisory structure are important improvements, however additional steps are necessary before the Department has the necessary controls in place to operate effectively.

## G. Review of Specific Tactics Including Community Engagement, Problem-Oriented Policing, and Crime Prevention

### Introduction

It is crucial for any law enforcement organization to build and maintain a strong, productive working relationship with the community that it serves. It is only through a strong collaborative partnership between the police and the community that solutions and initiatives can be developed and implemented that will result in a community that not only is safe, but feels safe as well. The importance of this relationship is even more pronounced in a campus environment where there is traditionally less crime, particularly violent crime, than in the community at large. Accordingly, regardless of how effective a campus police department is in reducing crime, its Community Affairs component must be comprehensive, resilient, and fully engaged if the department is going to succeed and be embraced by the community it serves.

Because of this infrequency of violent crime on college campuses, crime prevention, problem-oriented policing, and community-oriented policing are closely related. For this reason, we have chosen to deal with the three subject matters collectively in this section.

UCPD Community Relations SOP 45.2.101 recognizes the need for "strong community ties between the University Police and the community [they] serve." The procedure states that it is the responsibility of every officer to work toward the goal of establishing close ties with and responding to the needs of the community. However, the specific responsibility for the community relations function is assigned to the crime prevention officers.

Under the current UCPD Organizational Chart, there is a Community Affairs Unit that reports to the Professional Standards Captain. Among the other units reporting to this captain are: Internal Affairs, the Organizational Development Coordinator, and Training. Presently, there is no Captain assigned to Professional Standards as the incumbent recently left the Department for a position at another University.

There appears to be significant confusion over the organizational reporting structure for the Community Affairs function. To begin, there does not appear to be any rationale for Community Affairs reporting to Professional Standards, given their different missions. Moreover, this confusion has been somewhat heightened by the newly created position of Director of Community Police Relations.

The Community Affairs group includes two Community Engagement Officers (CEO's), the Victim Services Coordinator, Night Ride, and Campus Watch. These functions apparently now report directly to a lieutenant. It appears that the two CEO's are also tasked as the crime prevention officers referenced in the Community Relations and Crime Prevention SOPs.

In practice, it appears that most, if not all, of the existing community engagement activities are being carried out by the CEO's, with the support and encouragement of the Department's Public Information Officer (PIO). The PIO, who joined the Department in June, 2014, and who reports directly to the Chief, has designed and sought to implement a number of community engagement strategies during her tenure at UC. Among these are a social media strategy, a social media calendar, a Public Safety Communications Plan, and a Public Safety/Residence Education Partnership.

The PIO also serves as UCPD's advisor to the Student Safety Board (SSB), a group whose mission is to act as a liaison between the student body and the Office of Safety and Reform and to raise awareness through continuous education and peer services to create a safer environment for the UC community. The SSB has implemented a number of initiatives, including a Student Organization Awareness Program, (SOAP). As part of the SOAP initiative, each student organization must complete a safety presentation given by SSB as part of the organization's annual requirements. The presentation includes safety resources offered by Public Safety and the University as well as instruction on general personal safety, fire safety, and, among other things, hazing.

SSB also hosts Student Safety Week. This year, during Student Safety Week, which was held the week of March 14, 2016, students participated in an educational outreach event with UCPD and CPD.

The senior CEO at UCPD is both the institutional memory and the driving force behind UCPD's Community Engagement efforts, initially serving as a CEO during the tenure of Chief Ferrara. Although this position, like investigators, was

subject to a rotation period of four years, pursuant to the Collective Bargaining Agreement, the officer served in the role for an additional two years because of his affinity for the position and the success he was having. After being replaced after his six years in the position and returned to patrol for a period, he was asked to return to the position of CEO in 2013 and continues in the position today.

Since the 1980's, police departments across the U.S. have implemented successful Community Policing strategies. Perhaps best defined by Police Commissioner William Bratton, Community Policing relies on three P's: Partnership, Problem Solving, and Prevention. The police in partnership with the community work together to solve crime and quality of life problems leading to reduced crime and disorder and successful crime prevention outcomes.

Police practitioners first embraced Community Policing at the Harvard Executive Sessions on Policing in the 1980's where they learned about research by Dr. George Kelling (e.g., Broken Windows), Dr. Herman Goldstein (e.g., Problem-Oriented Policing), and Dr. John Eck, who introduced the SARA Model of Policing. Under the SARA Model of problem solving, patrol officers Scan or identify a community for problems or concerns; Analyze all inputs and information; design and implement an appropriate Response; and then follow up to Assess if that response produced the desired outcomes.

The SARA model has influenced current successful policing practices including CompStat (Computer Statistics), which was first introduced in New York City in 1994 by Commissioner Bratton. CompStat is a data-driven police management and accountability tool that has been credited with decreasing crime and increasing quality of life in New York and other cities across the nation that replicated the New York program. Similar to the SARA Model, CompStat relies upon: timely and accurate intelligence; effective tactics; rapid deployment; and relentless follow-up and assessment. Today, Community Policing and the SARA Model are evidenced in high performing police departments through effective crime prevention and community engagement strategies.

As part of the review of UCPD's Community Policing efforts, the Exiger Team also evaluated its crime prevention initiatives. In any effective police organization, all officers should be a part of the crime prevention process. UCPD's SOP 45.1.100 recognizes this principle. The procedure provides that two officers are to be assigned specifically to Crime Prevention; those officers are under the supervision of the Investigative Lieutenant, and with full time responsibilities

including planning and coordination of crime prevention activities. As noted above, the two Crime Prevention Officers called for in the current SOPs are serving as the Community Engagement Officers as well. While the Community Affairs Unit's responsibilities can and should include support for crime prevention strategies, through activities such as facilitating safety presentations, and establishing and maintaining neighborhood watch groups, this overlap should not give rise to a consolidation of the functions. Rather, the overall goals of Community Affairs and Crime Prevention will be best achieved by separate resources dedicated to each function.

A number of crime prevention initiatives were developed during the initial assignment of the Senior CEO many of which were discontinued when he returned to patrol. Thought should be given to reinstating many of those initiatives again, as well as some innovative initiatives proposed by the PIO.

There are presently a number of crime prevention initiatives in place at UCPD that contribute to the safety and the sense of well-being of the UC community and the surrounding areas. Additionally, by directly involving students, crime prevention initiatives help build bridges between the UCPD and the UC Student Body. Among these initiatives are the following:

- U.C. Ambassadors Program;
- Night Ride Program;
- Campus Watch;
- Live Safe App;
- Student Safety Board;
- Burglary Prevention Door Hanger Initiative;
- Theft from Auto Prevention Report Card;
- Campus Safety survey;
- Case Watch.

## Findings and Recommendations

**Finding 1:** UCPD's effort to develop and maintain a robust community affairs program is not centralized or coordinated.

**Recommendation 1A:** The essential nature of the community affairs function within the UCPD should be recognized and appropriate resources dedicated to it.

**Recommendation 1B:** The Community Affairs organization, as currently described in the Organization Chart, should be elevated to a more prominent position in the organization and should be staffed appropriately. The newly created position of Director of Community Police Relations appears to be the appro-

priate position for leadership of the organization.

**Recommendation 1C:** UCPD should create a separate Community Affairs Office that has dual reporting to both the Director of Community Police Relations and the Chief, thereby providing for greater visibility and operating authority throughout the Department.

**Recommendation 1D:** The existing SOPs should be reviewed and revised to reflect the new structure and mission of the unit, and consistent with current practice, its responsibility for community based crime prevention activities.

**Recommendation 1E:** Consideration should be given to whether the Victim Services Coordinator belongs in the Community Affairs Office or whether it might be more appropriately housed elsewhere within UCPD or the University.

**Finding 2:** Beyond the Director of Community Police Relations, daily supervision and leadership of the Community Affairs Program currently relies on the good faith efforts and initiative of the Community Engagement Officer and the Public Information Officer, both of whom lack the formal responsibility or authority to be able to implement ideas and programs effectively.

**Recommendation 2A:** The daily activities of the Community Affairs Office should be managed by a supervisor with formal operational authority to manage all of the various components of the Community Affairs mission, who has dual reporting to both the Director of Community Police Relations and the Chief.

**Recommendation 2B:** The supervisor position could either be a civilian title or a uniformed title but should be of sufficient stature as to be able to coordinate resources across the organization, particularly those resources that are not specifically assigned to Community Affairs duties.

**Recommendation 2C:** The Community Affairs Office should be staffed by a minimum of two officers whose sole responsibilities are community affairs duties.

**Recommendation 2D:** UCPD should assign officers throughout the Department as community liaisons to designated community groups, reporting in this function to the Community Affairs Office.

**Recommendation 2E:** UCPD should consider revising the provision of the Collective Bargaining Agreement that prescribes a four-year rotation period for CAOs given:

- The nature of the assignment is such that it requires a specialized type of experience and, perhaps more importantly, a strong sense of commitment by the assigned personnel;
- It is counterproductive to reassign qualified and committed staff from these positions;
- It results in a loss of continuity and institutional memory; and
- It diminishes morale and removes the incentive to excel.

**Recommendation 2F:** UCPD should design and implement a selection process for the Community Engagement Officers which evaluates candidates against the specific qualifications necessary for effective performance of the function, and includes the opportunity for community and student body input.

**Finding 3:** The Community Affairs Office staff is not currently receiving proper training.

**Recommendation 3A:** Community Affairs Office staff should receive specialized training on, among other things, the following topics:

- Public Speaking
- Crime Prevention (National Crime Prevention Council and Community Oriented Policing Services)
- Crime Prevention through Environmental Design (CPTED)
- Labor Relations
- Social Media

**Finding 4:** UCPD does not have a dedicated Event Coordinator who would be charged with primary responsibility for public safety planning for, resourcing of, and response to the myriad of events occurring on campus.

**Recommendation 4A:** UCPD should establish the supervisory position of Event Coordinator, with appropriate staff, whose responsibilities would include, but not be limited to:

- Review event permit applications in the University database and communicate with event planners to address security and safety concerns.
- Conduct a risk analysis of proposed special events to



determine the mitigation actions required including the number and type of security staff needed.

- Coordinate provision of security staffing and operations supporting events with university departments that facilitate events, including Transportation, Fire Safety, Facilities Management, Campus Activities, Hospitality, and Campus Filming.
- Represent the department in regular campus event and stadium event management meetings, and attend occasional production meetings, event walk-throughs, or meetings with individual event organizers.
- Plan and assign department staffing for events and security details.
- Prepare detailed written instructions/post orders for officers assigned to event or security details, and write operations plans for large or complex event details.
- Prepare and send cost estimates and invoices to event organizers for department event staffing, and assist department accounting staff in following up with event organizers regarding unpaid invoices.
- Serves as officer-in-charge for major event details conducting officer briefings and managing the events, such as student Move-in Day, football games, student concerts, Commencement and other major university events.
- Coordinate and liaise with outside law enforcement and public safety agencies regarding university events with wider impact, or community events that may impact both the university and surrounding community.
- Serve as UCPD point-of-contact for dignitary visits to the campus, coordinate with public or private security personal protection details (including Secret Service and protective details for other elected officials), and plan and arrange department staffing as needed.
- Serve as department point-of-contact for protests and demonstrations, and plan or coordinate department staffing as needed.
- Review and provide department approval for requests to serve alcohol at events at campus locations not licensed to do so, in coordination with Hospitality Services.
- Supervise any event coordination staff.

**Finding 5:** Our review found little evidence that UCPD has adequately integrated a problem-oriented policing approach into their policing practices.

**Recommendation 5A:** All UCPD personnel should be trained in a community policing problem solving approach.

**Recommendation 5B:** UCPD should consider enhanc-

ing the SARA model by adopting the CAPRA<sup>41</sup> community policing problem solving model being used by the LAPD and other police departments in the U.S. and Canada.

**Recommendation 5C:** UCPD, in partnership with the communities it serves, should develop a problem solving approach to chronic crime and disorder problems.

**Recommendation 5D:** If UCPD continues to patrol off campus, then problem-solving groups should be established that include community residents and CPD.

**Recommendation 5E:** A policy should be developed that outlines the problem-solving program, and contain clear roles, responsibilities and expectations regarding the UCPD's problem-solving efforts.

**Finding 6:** While the UCPD currently has a number of effective crime prevention initiatives in place, additional programs should be implemented.

**Recommendation 6A:** UCPD should increase the number of CCTV cameras deployed in both the on and off campus communities, and should collaborate with both UCPD and CPD investigators to identify strategic locations to place the additional cameras.

**Recommendation 6B:** UCPD should institute a 'Safe Haven' program whereby local businesses register with UCPD, agree to display a distinctive logo on their storefronts that identifies them as a Safe Haven, and pledge to assist University affiliates in distress.

**Recommendation 6C:** UCPD should consider implementing Operation Blue Light, a program that authorizes UCPD personnel to mark property with an invisible ink discernible only under a special blue light.

**Recommendation 6D:** UCPD should consider implementing Operation ID, a nationwide program that aims to deter theft by permanently identifying valuable property with an indelible, inconspicuous, specially assigned number.

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<sup>41</sup> CAPRA is a Problem Solving Model from the Royal Canadian Mounted Police. It is a circular model, designed to reinforce the need to continually adapt, redefine, seek additional information, assess, respond, reassess, adapt responses, and reassess. The model focuses on the need to keep the clients and partners in mind at all times throughout the process. The letters stand for: C: Understanding CLIENTS (or COMMUNITY), their needs, demands, and expectations. A: ACQUIRING and ANALYSING information. P: Establishing and maintaining PARTNERSHIPS for problem solving. R: Application of RESONSE strategies to solve problems. A: Continuous ASSESSMENT of performance.

**Recommendation 6E:** UCPD should consider implementing PC PhoneHome/Mac PhoneHome, a program that allows authorities to locate a lost or stolen computer by identifying its location when the machine is connected to the Internet.

**Recommendation 6F:** UCPD should consider employing Stop Theft Tags, which possess a unique ID number that is entered into the STOPTHEFT worldwide database, and allow lost or stolen property to be reunited with its owner.

**Recommendation 6G:** UCPD should explore a Bicycle Registration program, where a permanent decal is affixed to the bicycle, thus giving it a unique ID number that is registered with the UCPD.

## Conclusion

There are many productive Community Engagement initiatives at UCPD. Some initiatives are already in place and others that have not yet been implemented because of organizational and staffing deficiencies. Although there is the nucleus of a good community engagement program at UCPD, additional organizational and operational recommendations are presented herein to enhance this program even further.

## H. Review of Encounters with Individuals with Mental Health Concerns

### Introduction

The UCPD has a checkered past when it comes to dealing with individuals with mental health concerns. The University Hospital, which contains a large psychiatric ward, was within the UCPD's jurisdiction until December 31, 2012. On a number of occasions, UCPD officers have found themselves in potentially problematic situations with patients at this facility, most notably the 1997 shooting death of escaped mental health patient Lorenzo Collins, and the 2010 death of Kelly Brinson, who was tased inside of the University Hospital. These incidents left many to question whether the UCPD was properly equipped to handle policing people with mental illnesses. Understanding the types of mental illnesses that can affect people, and knowing how to handle people suffering from such afflictions is crucial for any university police force. Furthermore, studies have shown that college students are likely to develop issues including depression, and that police officers are typically the first line of contact for people who are undergoing a mental health crisis.

Currently, the UCPD has one policy on mental illness response. The policy is antiquated and applies to the hospital

that the Department no longer contracts with. To its credit, interviews with officers revealed that a significant majority of the Department has undergone Crisis Intervention Training (CIT), a 40-hour course that includes discussions with mental health providers and family advocates, and role playing exercises. In addition to CIT, officers complete a yearly two hour Ohio Attorney General's online training course on de-escalating mental health crises. A minimum of two CIT trained Officers are assigned to each patrol watch, with this number expected to grow as more officers receive this training.

The frequency of mental health responses has not historically been captured on a department-wide level. Anecdotally, one officer stated that she responded to approximately three mental health crisis calls during her two-year employment with the Department. Such calls pertained to possible depression and anxiety caused by a student being away from home for the first time, as well as romantic relationship disillusionment. The common practice, not supported by any formal policy or procedure, is for officers in such cases is to transport students to the Student Health Center on the campus. When incidents like this occur during non-business hours, common practice is for officers to transport students to Deaconess, a City mental health facility near campus. There is, however, no SOP supporting this protocol.

While UCPD does stress CIT training for the majority of their officers, thus recognizing the increasing occurrence of this type of event in its police work, it is important to delineate the following concerns that face police, particularly campus police, while dealing with individuals suffering from mental health issues:

- Police officers are typically the first line of contact for people who are undergoing a mental health crisis;
- Mental illness typically manifests itself in people ages 16-24 (college age);
- Nearly 10% of all police contacts involve some aspect of individuals suffering from mental illness;
- People who suffer from mental illness are more likely to harm themselves than others;
- In a college campus environment, despite a host of resources available to most college students during business hours, campus police are typically the only resource available 24 hours a day, 7 days a week and during the hours when students are most likely to experience manifestations of their illnesses;
- Handling of a mental health crisis becomes increasingly dangerous when alcohol or drugs have been consumed - an increased risk within a University setting;
- Diversion to imprisonment rather than mental health services prolongs possible treatment, overcrowds jails,

and ultimately, increases and exhausts the use of law enforcement and criminal justice resources.

## Findings and Recommendations

**Finding 1:** While there are some existing practices, UCPD does not have adequate policy or procedures articulating how to deal with incidents involving individuals suffering from mental health issues.

**Recommendation 1A:** UCPD should establish clearly written policies and procedures based upon existing best practices used by other campus police departments.

**Recommendation 1B:** The new policy should include a list of generalized signs and symptoms of behavior that may suggest mental illness.

**Recommendation 1C:** The new policy should include a list of indicators that will help an officer determine whether a person with a mental illness represents an immediate or potential danger to him/herself, the officers, or others.

**Recommendation 1D:** The new policy should include guidelines for officers to follow when dealing with persons they suspect are mentally ill. These guidelines should, at a minimum, include:

- A requirement that officers request backup when responding to situations involving a mentally ill person, especially when there is the potential for an arrest;
- A section that makes clear that the officer's objective is to de-escalate, in effect to calm the situation, and provides techniques for doing so;
- Procedures for placing a mentally ill individual under arrest; and
- Procedures for transporting that individual.

**Recommendation 1E:** UCPD should review applicable reports from other jurisdictions, including the University of Southern California General Order on Responding to Persons with Mental Illness, and the report from the County of Los Angeles Mental Health Advisory Board, and incorporate suggestions from those reports in policies, procedures, and training.

**Finding 2:** There is no holistic or synergistic approach being used among all affected University entities that may be

called upon to deal with individuals suffering from mental health issues.

**Recommendation 2A:** The University should implement a Student Concerns Committee similar to those in place at other universities. This committee should consist of first responders and those potentially in a position to take early notice of irrational student behavior, including: a UCPD representative, preferably at the command level, and representatives from other university offices, such as student affairs, student health and disability service providers, residential life, student counseling, student judicial affairs, and veteran resources.

**Recommendation 2B:** The Student Concerns Committee should meet on a weekly basis to discuss issues that took place during the previous week and are potentially related to mental health, and collaboratively create a plan of action. Such action may include contacting a counselor to meet with the student, delaying the student's academic demands (to assist with issues such as anxiety), or simple monitoring.

**Finding 3:** There is no apparent recognition of potential peak periods of stress for students that may bring on increased manifestations of emotional crisis.

**Recommendation 3A:** Until all UCPD officers are CIT certified (see Recommendation 4A), to the extent that it is practical, UCPD should ensure that additional officers trained in crisis intervention are deployed during potential peak periods of stress for students (mid-terms, finals, holidays), including at least one CIT trained officer working on each tour.

**Finding 4:** While UCPD's current mental health training practices exceed those of most other Campus Law Enforcement Agencies, there are additional measures that represent best practices in this area.

**Recommendation 4A:** All sworn officers should be trained and certified in Crisis Intervention, with documented refresher training on a bi-annual basis.

**Recommendation 4B:** UCPD should utilize UCMC experts to educate officers on issues specific to student populations, particularly those within the University community. This should include sensitivity training, highlighting the challenges faced by students who are away from home for the first time.

**Recommendation 4C:** UCPD should consider establishing proactive response teams pairing an on-call UCMC clinician with a law enforcement officer to provide emergency field response to situations involving mentally ill, violent, or high risk individuals.

**Finding 5:** UCPD does not currently keep a record of all encounters with individuals suffering from mental illness.

**Recommendation 5A:** After every encounter with an individual suffering from a mental illness, UCPD should mandate detailed reporting for inclusion in the ARMS system.

**Recommendation 5B:** In order to improve performance, UCPD should annually audit its handling of mental health-related calls and incidents for that year.

## Conclusion

Despite a history of problematic interactions with individuals having mental health issues, the UCPD's current mental health training and implemented informal practices are satisfactory. There are still a number of enhancements, however, that the UCPD needs to make. The recommendations made herein are designed to ensure that the UCPD continues to improve its ability to work with individuals with mental health issues, thus minimizing the likelihood of encountering situations that could unnecessarily lead to the use of deadly force.

## I. Review of Equipment

### Introduction

In the aftermath of the shooting death of Samuel DuBose, questions arose as to the quality and nature of the weapons with which the UCPD was arming its officers. That question was broadened for purposes of this review to a mandate to look at all equipment utilized by UCPD. The Exiger team also included as part of the review, a look at existing facilities to determine whether the facilities meet the needs of UCPD and comport with best practice.

With regard to weapons, it is common sense that

where the patrol officer is equipped with . UCPD has, however, previously restricted the spectrum of less-lethal weapons available to its officers. Notably, in August 2011, UCPD removed use of TASERS

as the result of two TASER related deaths within a 20-month period. One of the purposes of this portion of the Review was to determine whether any change to that policy should be made.

In completing this section of the Review, the Exiger team conducted a thorough analysis of the equipment currently being used by the UCPD. For purposes of this introduction, we will provide a brief description of this equipment, which can be broken down into the following categories: communications equipment, vehicles, technology (including audio-visual equipment), weapons, hazardous device response equipment and facilities.

With regard to communications equipment, UCPD currently has 170 radios for all members of public safety, including police, security, fire inspectors, technicians, and communications personnel. This number also includes spare and back up radios as well as radios designated for special assignments such as command centers, auxiliary police and Campus Watch. The number appears to be sufficient and the quality of the devices appears to be adequate, allowing for appropriate operational communications.

With regard to vehicles, UCPD currently has 27 vehicles (marked and unmarked). 12 of the vehicles are equipped with Mobile Data Terminals (MDTs) and one has a License Plate Reader (LPR). Additionally, the UCPD has four Harley Davidson motorcycles, four Segway Transporters, and five patrol bicycles for alternative patrol units. There are an additional 22 vehicles in the UCPD inventory, including three Fire Prevention vehicles, four Alarm Technician vehicles, five Access Control vehicles, and 10 vehicles for the Night Ride program. A visual inspection of vehicles that were observed showed that the fleet is in generally good repair.

With regard to technology, the UCPD has the aforementioned MDTs and LPR, as well as ten tablets that are issued to the Night Ride program. In addition, UCPD officers told Exiger that there are approximately 30 desktop computers and approximately 30 laptop computers. Exact numbers were not supplied, nor were any serial or identification numbers.

There are 269 surveillance cameras placed throughout the campus with approximately 25 of them being Point/Tilt/Zoom (PTZ) cameras and the rest being fixed focus cameras. UCPD officers informed Exiger that the PTZ cameras need new upgraded components. There are 10 cameras available for investigative purposes as well as a handheld video camera for filming any demonstrations. The



UCPD also has five GPS tracking units and three crime scene processing kits.

With regard to weapons, each officer is issued a Sig Sauer .40 caliber handgun as well as an expandable baton and OC (oleoresin capsicum or pepper) spray. Each officer must receive training and qualify with these weapons before being allowed to deploy with them. The UCPD has, for use in an active-shooter situation, 20 Remington 12 gauge shotguns and 20 AR15 rifles, which are deployed in the trunk of patrol vehicles. There is also a single Remington bolt-action sniper rifle designated as a SWAT weapon. Once again, officers must be trained in their use and qualify with each of these weapons before being authorized to utilize them. In addition, the UCPD has two 40mm Launchers for use with less-lethal projectiles, such as bean bags; the launchers can only be operated by trained supervisors. Finally, there are 16 side handle PR-24 Batons which policy states can only be used by properly trained and qualified officers for riot control situations. There does not, however, appear to have been any recent training in riot control or relative to the use of the PR-24 batons.

In evaluating UCPD's available weapons, the lack of CEDs, of which TASER is one brand, was notable. As indicated above, UCPD did provide CEDs to its officers before 2011, but removed them from use after a second fatal incident involving the deployment of a CED. As the two fatal incidents vividly point out, less-lethal weapons, including CEDs are not a panacea, nor do they entirely remove the risk of serious physical injury or death. What less-lethal weapons are intended to do, however, is provide an officer with an alternative to the use of deadly physical force, and in the case of a TASER, an alternative to close combat with strikes, batons, or OC spray. The provision of the less-lethal alternative serves to lessen the risk of serious physical injury to both the suspect and involved officers.

With regard to hazardous response equipment, UCPD has a Hazardous Devices Unit for response to Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) weapons of mass destruction. This is becoming more common in universities located in urban environments, and UCPD has well-equipped this unit. UCPD has two full bomb suits, two Self-Contained Breathing Apparatus (SCBA) and numerous other protective items as well as equipment, including a remote-controlled bomb robot, to help them detect and disrupt explosive devices. In addition to the equipment for the designated Hazardous Devices Unit, the UCPD also have 10 Kevlar Helmets, 25 M40 Gas Masks, 50 CBRN filters for those masks,

and 25-rubber chemical over boots – presumably for additional officers to use in case they do have a CBRNE incident. There are two canine officers who deploy with dogs trained for explosive work, not patrol work. These units are particularly useful during special events such as dignitary visits, political rallies, or major sporting events.

With regard to facilities, the Exiger team has reported on the inadequacy of UCPD training facilities elsewhere in this report. In addition to this deficit, Exiger also noted that UCPD does not currently have an Emergency Operations Center from which emergency personnel from UCPD and Office of Emergency Management can operate for both planned and unplanned events coordinating with outside federal, state, and local agencies.

## **Findings and Recommendations**

**Finding 1:** While UCPD is very well-equipped to handle situations in which deadly force is required, a significant gap in the less-lethal force continuum exists. UCPD does not currently utilize CEDs, removing an option that would allow officers the ability in appropriate circumstances to disable an individual from a safe distance and avoid potential resort to deadly physical force.

**Recommendation 1A:** UCPD should re-deploy CEDs under whatever constraints may exist from the settlement of prior lawsuits, thereby expanding the alternatives that its officers have to the use of deadly physical force.

**Recommendation 1B:** UCPD should review all policies and procedures related to the use of CEDs to include, but not be limited to, when the use of the devices is authorized and the allowable number of discharges of the device.

**Recommendation 1C:** UCPD should develop intensive training on the use of CEDs and the relevant policies related thereto. Training should include scenarios in which the utilization of CEDs is appropriate and those instances where it is not.

**Recommendation 1D:** UCPD should designate an officer as a CED training officer; that officer should receive training as a trainer and whose responsibilities should include remaining current on all relevant literature and data on the use of CEDs.

**Finding 2:** There is currently limited utilization of video sur-

veillance in the off-campus designated patrol areas.

**Recommendation 2A:** UCPD, working with CPD and appropriate neighborhood organizations, should consider providing significantly greater deployment of video surveillance in the off-campus patrol areas. Video surveillance can potentially be monitored for crimes in progress, holding promise for both apprehension and deterrence, as well as being reviewed as an evidentiary tool in the case of a past crime.

**Finding 3:** Components of the currently deployed on-campus video surveillance system should be upgraded.

**Recommendation 3A:** A review of all existing video surveillance equipment should be undertaken in conjunction with the exploration of an off-campus video system.

**Finding 4:** UCPD has 16 side handle PR-24 Batons for use in crowd control. By policy, these batons can only be used by trained and qualified officers, and yet the requisite training has not been provided.

**Recommendation 4A:** UCPD should develop or adopt appropriate training for the use of the batons, and ensure that every sworn member of UCPD receive such training in order to be properly qualified for use of the baton in crowd control.

**Finding 5:** UCPD's method of tracking equipment does not comport with best practice.

**Recommendation 5A:** UCPD should evaluate and choose an automated, commercial off-the-shelf product for tracking of all equipment.

**Finding 6:** UCPD maintains a remote controlled bomb robot within its inventory. It is unclear if any member of the department is appropriately trained on its use, nor are there policies in place for its deployment and utilization.

**Recommendation 6A:** UCPD should evaluate the need and potential utilization of the bomb robot. UCPD should consider the mutual aid agreements with and response times of bomb squads in neighboring jurisdictions against the total cost of maintaining the robot and providing adequate training for its utilization.

**Recommendation 6B:** Should the above-recommended evaluation conclude that there is justi-

fication to retain the robot, appropriate initial and refresher training and qualification of a select group of sworn officers on the utilization of the robot and related skill sets including bomb disposal should be developed and deployed. Training should include exercises with those agencies that would provide mutual aid in relevant situations.

**Finding 7:** UCPD maintains a Remington bolt action sniper rifle within its equipment inventory designated as a SWAT weapon. It appears that no member of the department is trained on its use, nor are there policies in place for its deployment and utilization.

**Recommendation 7A:** UCPD should evaluate the need and potential utilization of the sniper rifle taking into consideration mutual aid agreements with and response times of SWAT teams in neighboring jurisdictions against the total cost of maintaining adequate training for its utilization.

**Recommendation 7B:** Should the above-recommended evaluation conclude that there is justification to retain the rifle, appropriate initial and refresher training and qualification of a select group of sworn officers on the utilization of the rifle should be developed and deployed. Training should include exercises with those agencies who would provide mutual aid in SWAT situations.

**Finding 8:** UCPD does not currently have video recording capabilities in their vehicles.

**Recommendation 8A:** UCPD should consider the installation of in-car video as an adjunct to the current deployment of body cameras, providing for potential additional views of and redundancy in any critical incident.

## Conclusion

A police department that is properly equipped is in a much better position to safely and effectively discharge its mission. UCPD is a generally well-equipped department. The return of TASERs to the Department and the implementation of the other recommendations made herein will put the Department in an excellent position to not only safely and effectively discharge its mission, but also to restore community trust in the Department.

## J. Review of Technology

### Introduction

A law enforcement agency's vision for technology must be driven by its operational objectives and goals for public safety. When utilized effectively, a police department can leverage technology to enhance how the community and the police interact. The future of technology in any agency should focus on moving the agency into the digital age, enabling its officers and community to leverage quickly-advancing mobile technologies and should always include clear metrics for determining the outcomes realized by each technology implementation. In this manner, technology can become a force multiplier, increasing efficiency and effectiveness and reducing crime. Equally as important, a successful technology program can elevate the police experience for the community member, shifting the interaction with the police from a "response" to a "service."

One significant technology that the UCPD is currently using is body cameras. UCPD began researching body cameras in 2013. The Department tested multiple cameras, and ultimately selected the Axon Body 1 from TASER International (TASER). The initial deployment of body cameras did not leverage TASER's hosted storage and video management solution, Evidence.com. Instead, the UCPD decided to store the video locally on premise. When Chief Goodrich joined UCPD, he approved the transition to Evidence.com, and the UCPD began using the hosted solution for storage and video management. All video from the initial deployment, however, remains in local storage and had not been migrated to Evidence.com.

UCPD is also currently making use of dispatch technology. Dispatch technology typically includes a 9-1-1 telephone system for the receipt of 9-1-1 calls, a CAD system utilized to deploy officers to incidents in the field, a radio system for officer communications, and a radio and voice logger to record all 9-1-1 calls and radio transmissions. Many dispatch centers are supplemented with various other ancillary systems and responsibilities, depending on the operations of the particular agency.

The UCPD has utilized the Motorola PCAD platform for CAD since 2006. Dispatchers access CAD via the consoles in the dispatch center, and officers in the field access CAD via the MDC's in the vehicles. The CAD platform is provided by the City of Cincinnati via a lease arrangement. The City of Cincinnati supports the CAD platform itself (hardware and software), and University Public Safety Technical Services staff supports console workstations in the UCPD dispatch center. UCPD staff can pull incident history from the CAD, however,

other data appears difficult to access. In addition to dispatching its own officers, the UCPD also performs the dispatch function for Cincinnati State.

The City of Cincinnati is decommissioning the Motorola CAD platform and migrating to a CAD developed by TriTech later in 2016. The City police department and UCPD will move at the same time. The City will provide training to UCPD dispatch. The UCPD is expected to have better access to dispatch data via the TriTech platform than it does on the current platform.

UCPD's 9-1-1 telephone capabilities are integrated with and dependent on the University of Cincinnati phone system. The UCPD utilizes a platform called Higher Ground to record 9-1-1 calls and radio transmissions.

UCPD also has public safety IT systems supported by Public Safety Technical Services, under the direction of the Technical Services Manager, including, but not limited to:

- Alarm System
- Access control and badging (and a related third party reporting system)
- DVTEL video management system (for CCTV)
- Key management system
- SMS server as back up to Nixle
- Nixle administration
- GTRI monitoring system
- Iris reader for secure doors
- Fire Inspection System
- Web Check for fingerprinting

UCPD also has Public Safety Technical Services, under the direction of the Technical Services Manager, including the following resources:

- 2 IT (1 Hardware/Systems, and 1 programmer) for desktop support
- 2 front desk (badging, card access, finger printing, web checks)
- 1 Supervisor (card readers, door lock schedules, cctv cameras)
- 2 Technicians (card readers, door lock schedules, cctv cameras)
- 2 Lock Smiths
- 1 Fire Supervisor (service alarms and smoke detectors)
- 6 Fire Technicians (service alarms and smoke detectors)
- 1 Fire Inspector Supervisor
- 3 Fire Inspectors

## Findings and Recommendations

**Finding 1:** UCPD has implemented body cameras which already places it ahead of most University police departments. The body camera policy, however, does not address a number of issues, including how video is handled subsequent to an incident involving a shooting or serious use of force.

**Recommendation 1A:** UCPD should implement a requirement that each officer create a test recording before they deploy to the field each day to ensure the camera is functional. If a camera is not functioning properly, the officer should be required to check out a new, functioning camera before he/she deploys to the field.

**Recommendation 1B:** The policy should address how to specifically handle video in use of force cases (i.e., who takes custody of the camera, who uploads and reviews the video, when should an officer review video, etc.).

**Recommendation 1C:** Those developing the body camera policy should continue to refine and improve the policy as lessons are learned throughout the deployment. They should also collaborate with other agencies that have deployed cameras to learn from those experiences.

**Recommendation 1D:** The UCPD should consider including the body camera policy as a topic of discussion in community forums, student body meetings, etc.

**Finding 2:** The battery life of the body cameras is only 7-8 hours. Some of the cameras deployed go into “offline mode,” which means the camera must be “reassigned” to the officer in Evidence.com by the system administrator. UCPD purchased very limited storage space (400 GB of storage for the entire camera deployment), which will fill up quickly, requiring video to possibly be deleted earlier than retention requires.

**Recommendation 2A:** UCPD should consult a subject matter expert to assist in negotiating an agreement for cameras and storage so that it includes a number of critical terms (e.g., discounted pricing; a “termination for convenience” clause; the appropriate level of on-site training and support from the manufacturer; etc.). At a minimum, the contract should include increased cloud storage and the ability to swap out

cameras as technology advances.

**Recommendation 2B:** UCPD should identify any video in the UCPS on premise storage that must be retained into the future, and work with the storage provider to migrate that video to the cloud for long-term storage.

**Recommendation 2C:** UCPD should consider engaging a provider for additional system training, to ensure the Department is making full use of the features and functionality of its video management system.

**Finding 3:** Officers are not consistently categorizing the video as they capture it, leaving a considerable number of uncategorized videos. This could have a significant impact on video retention, and UCPDs ability to produce video as required by law. The current practice is to label or “tag” each video with a suspect’s name.

**Recommendation 3A:** UCPD should modify its practice of tagging video with only a suspect’s name. Instead, it should consider utilizing additional identifiers, such as the CAD incident number and/or an RMS record number.

**Recommendation 3B:** To aid in the effort of properly tagging video, UCPD should consider contracting with a vendor that allows for CAD integration with its video management system. By interfacing with CAD, the video management system would be able to utilize various attributes (e.g., date, time, geo-location, officer involved, etc.) to automatically associate video with the related incident in CAD.

**Finding 4:** ARMS, an electronic records management system, appears to be well supported and is being upgraded to the most recent version of the software.

**Recommendation 4A:** The UCPD, in conjunction with the IT staff, should ensure that all business/functional requirements for ARMS are clearly documented and that testing of the upgraded ARMS is conducted against those requirements before the system is accepted.

**Finding 5:** Currently, officers must return to a station or sub-station to complete a report in ARMS.

**Recommendation 5A:** The UCPD should consider implementing an ARMS Mobile Product on MDCs and/or tablets to enable officers to complete reports from the



field. This could be accomplished by issuing a mobile device to each officer, or by deploying tablets to various locations across campus.

**Finding 6:** The dispatch center includes three CAD positions for dispatching, but only two of those positions are equipped with a radio console.

**Recommendation 6A:** The UCPD should add a radio console to the third position so the Department can better handle multiple calls at the same time.

**Finding 7:** A 9-1-1 call typically comes into the dispatch center with only a phone number or a name to identify the caller, and without a building name, address, or room number. If a caller is unable to identify their specific location, the dispatcher must look up the phone number or name in a separate University directory to determine the location of the caller.

**Recommendation 7A:** UCPD should implement a 9-1-1 system that provides the actual geo location of the call, as is standard in dispatch centers across the country. Moving to a traditional 9-1-1 platform also allows the UCPD to consider enabling “text-to-911” functionality, as well as “next generation” dispatch functionality (i.e., digital photos and videos to 9-1-1).

**Finding 8:** The UCPD has implemented “Live Safe,” a mobile application that allows students to text tips to UCPD Dispatch and attach photos, call the campus police, or dial 9-1-1. Dispatchers monitor the system for tips, and to ensure that if a true emergency is submitted as a tip, officers can respond accordingly. The Live Safe app also provides “follow me” functionality so a student can have a friend watch his/her location as they walk across campus.

**Recommendation 8A:** Live Safe provides a great safety feature that should be implemented at colleges across the country. The UCPD should explore ways to expand adoption both on campus and potentially off-campus as well.

**Finding 9:** The existing card access system that controls the doors on campus buildings is going to expire and must be replaced. While the vendor will offer limited extended support until 2020, it is growing increasingly difficult for IT staff to support the system and obtain replacement parts for the system.

**Recommendation 9A:** Funding for a replacement card access system should be identified, and an RFP should be drafted for the procurement of a new system.

**Recommendation 9B:** As part of the preparation for procurement, Public Safety Technical Services should document the requirements for a replacement system and include a plan for potentially integrating the card access system with an existing key management system that was developed in-house.

**Finding 10:** Public Safety Technical Services lacks project management resources to manage system implementations. IT projects may be at risk not because of technical issues, but due to lack of proper project management.

**Recommendation 10A:** The University should consider adding one IT Project Manager to its Public Safety Technical Services staff to ensure large IT projects are implemented according to IT project management best practices.

**Recommendation 10B:** Public Safety Technical Services should engage in a study to determine the appropriate IT staffing levels. It appears that additional Technicians are likely required to support the IT needs of the Department.

## Conclusion

If implemented properly, the UCPD can utilize technology to improve efficiencies and productivity, enhance situational awareness, and increase public trust. The existing public safety technology appears to be maintained and supported from a technical perspective. However, to grow as an organization, the IT organization must be positioned and resourced to also support system upgrade and replacement, as well as support new and emerging technologies, such as body worn cameras and next generation CAD. Further, the UCPD must invest the time and resources in developing policies and training for each of its technologies to ensure consistent use and application of the various systems.

## K. Review of Data Collection Systems, Data Usage, Automation, and Records Management

### Introduction

The collection of data is not new to law enforcement. Since the 1930s, the federal government has asked local law enforcement agencies to report regularly on specific crimes in order to monitor and assess crime in America. The primary objective of the reporting was to generate reliable information for use in law enforcement administration, operation, and management. Over the years, however, such data collection has become one of the country's leading social indicators and has enabled various governmental research and planning initiatives.

Today the amount of data and its use by law enforcement is limited only by an agency's imagination. And, with growing local and national concerns regarding the constitutional practices of law enforcement agencies and officers, there is a heightened need for law enforcement agencies to harness data in new, myriad ways in an on-going and proactive manner.

The shooting of Samuel DuBose has caused many to question what data collection and analysis was being performed by UCPD and whether his death could have been prevented with more thoughtful analysis. While the scope of this review will cover what data is or should be collected and used by UCPD for administrative, operational, and management purposes, it will also look at what types of data is or should be collected and used by UCPD to engage in proactive risk management efforts to ensure constitutional policing by UCPD personnel.

As discussed in the previous section, UCPD currently utilizes a CAD system owned and operated by the CPD. This CAD system is in the process of being upgraded and coordinated with the Hamilton County CAD system. The new CAD system is being provided by TriTech, a company utilized by many law enforcement agencies nation-wide. UCPD will also be part of this new CAD system. By being part of this new multi-agency CAD system involving Hamilton County, the City of Cincinnati, and UCPD, each agency will have real-time information for all law enforcement, fire, and EMS activities within each jurisdiction and allow for coordinated responses.

The current UCPD CAD system allows for the collection of data that is reliable, and consistent with best practices in law enforcement. The CAD system functions include resource management, call taking, location verification, dispatching, unit status management, and call disposition. The CAD system also properly categorizes incidents through a uniform coding system; that coding system is consistent with the

CPD CAD system, thereby allowing personnel from both agencies to readily identify and understand the types of incidents to which they are responding. The data entry interface for CAD has specific data fields and utilizes pull down menus for data entry thereby limiting the ability of the data entry person to enter inconsistent information.

UCPD currently utilizes an electronic records management system called ARMS developed by End2End, a leading records management system provider for law enforcement. ARMS allows for the storage, retrieval, and viewing of information, records, documents, and files related to UCPD's law enforcement operations. The ARMS system is up-to-date and is utilized by UCPD for the majority of its reports, including offense reports, information reports, and traffic reports. UCPD's ARMS system tracks all relevant data for mandated Uniform Crime Report submissions and Clery Act submissions. In addition to the basic crime and informational reports, UCPD's ARMS system allows for entry of evidence records, crime scene photos, and other types of records that can be scanned and linked to an incident, such as signed witness statements and booking papers. The typical incident report contains the factual information for the incident, including offense information, suspect information, evidence, case status and information pertaining to perpetrators, witnesses, and victims. Once reviewed and approved by a supervisor, the report is locked and cannot be edited or changed. UCPD's ARMS system also allows for the use of supplemental reports, which is used to add new information to the initial incident report. Once approved, supplemental reports are also locked and stored. UCPD investigators also utilize the ARMS system to record their investigations.

UCPD is in the process of adding the Use of Force Module offered by ARMS. This module allows use of force information to be reported and stored with the related incident. UCPD, however, has not obtained access to ARMS' module for Field Contacts. A Field Contact is typically triggered when the law enforcement officer observes suspicious or unusual activities of interest; these observations would not otherwise be documented in a records management system as such systems are used to report and store information related to criminal and non-criminal events (e.g., traffic collisions). In addition to basic information related to time and location, general circumstances, names and descriptions of persons, identifying information on vehicles or other property, the Field Contact Module allows for the collection of demographic data for analysis of potential biased policing problems. Realizing the need to collect this type of data for analysis, UCPD created a Microsoft Access database to track demographic data associated with pedestrian and traffic

stops. This Access database, however, does not feed into ARMS.

UCPD's ARMS system allows for immediate access to incident reports and records related to the incident. The ARMS system also has the ability to generate the mandated Uniform Crime Report and Clery Act reports. In 2013, UCPD began working with UC and CPD personnel to study and analyze crime occurring on campus and in the immediate area surrounding UC. Data from ARMS has been leveraged during biweekly meetings with UCPD and CPD command staff and senior UC Administrators. The ARMS data, along with other strategies, has successfully led to the overall reduction of crime in the last two years. The collection and analysis of crime data from ARMS is performed by ICS.<sup>42</sup>

UCPD utilizes two hard copy forms to track off-campus properties associated with UC students. The Dispatched Party Location Form is used by patrol officers when they are dispatched to a report of a loud party off campus that may involve UC students. UCPD receives notification of these by several means, including: phone call to UCPD, Livesafe phone app, notification from CPD, and proactive patrol. This data is collected and stored in a Microsoft Access Database. The Party Problems Form is used by patrol officers to check off-campus properties known to be occupied by UC students and to have a history of loud parties or excessive trash in the yards, among other things. A property will make it on this list if it is noted for any violations two or more times during a 30-day period. The property will remain on this list until 30 days pass with no activity. Patrol officers will check the properties nightly and note their findings. This data is collected and stored in a Microsoft Access Database.

UCPD works with ICS on crime analysis. ICS obtains the data for its analysis by accessing the data in UCPD's CAD system and ARMS system. The Dashboard created by ICS provides data analytics and visualization, as well as crime analysis and mapping for the UC campus and the immediate area surrounding the campus.

Following the shooting of Samuel DuBose, UCPD revised its field contact form (now Contact Card) to collect data related to traffic and pedestrian stops. The Contact Card now requires the recording of demographic data related to a stop. UCPD officers are required to complete a Contact Card for

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<sup>42</sup> The Institute of Crime Science provides evidence-based, empirically tested solutions for national, regional, state, local and international law enforcement and criminal justice agencies. Aside from this use of ARMS data by ICS for the bi-weekly meetings, UCPD does not utilize ARMS data for regular crime, operational, staffing or performance analytics with UCPD personnel. Additionally, the ARMS table structure is complicated and makes the pulling of data for aggregate reporting and analysis difficult.

all involuntary stops. The data collected from Contact Cards is stored in a Microsoft Access database. If the stop leads to a citation or arrest, the Contact Card is scanned and stored in the ARMS database. The Microsoft Access database collects the following data from the Contact Card: report number, officer(s) name, date, time, location, whether the stop was initiated by the officer, the reason for the stop, and the action taken. The database also collects information on the race, gender, and approximate age of the individual stopped. The Microsoft Access Database is user friendly; the user can either check boxes related to the data collected on the forms or make a selection from a pull down menu for available options. This allows for uniform data collection and reduces the chances for input errors.

UCPD currently utilizes Guardian Tracking software to document employee performance and to flag potential patterns in employee performance for early intervention. In early 2015, the prior UCPD administration established the software's use-parameters. For performance issues, Guardian Tracking software comes with stock categories and sub-categories, but also allows for customization. Categories utilized by UCPD include: Awards/Recognition, Staff Employee Performance, General, Recognition Classification, File Purposes, Leadership, Professional Standards, and Discipline. UCPD has also identified over 80 sub-categories to track employee performance. Many of the sub-categories are duplicative and some sub-categories have not been used at all. Having too many sub-categories, some of which are duplicative, causes not only confusion but also inhibits the ability to properly track employee performance and identify potential patterns that may need intervention. UCPD utilizes three flagging categories and 19 sub-categories. Sub-categories are then weighted based upon seriousness and then time periods are chosen for which a total score will trigger a flag. For example, a score of 3 in 90-days. UCPD's categories and sub-categories have duplicate fields with inconsistent criteria. For example, the same sub-category is weighted differently for different flagging categories. Additionally, the weight chosen for the different sub-categories appears arbitrary and illogical.

By inputting employee performance into an electronic database, UCPD has provided immediate access to employee performance data to not only supervisors and management, but also to the employees themselves. This allows managers, supervisors, and employees to be regularly informed on performance issues and to take appropriate action. The interface of Guardian Tracking is simple and user-friendly. After selecting the appropriate performance category, the user identifies the date and the person being reviewed. Then,

there is a text field for the user to document appropriate performance issues. Relevant documentation can be attached to the entry. Once the entry is completed, it is sent to the relevant supervisor or manager for review and approval.

## Findings and Recommendations

**Finding 1:** UCPD is currently using several different systems for collecting and storing data, including the CAD system, ARMS, Guardian Tracking, the ICS Dashboard, and a number of unconnected Microsoft Access Databases.

**Recommendation 1A:** To the extent that it is possible, UCPD should integrate its data collection systems into one large database where all of UCPD's information can be retrieved and analyzed. Alternatively, UCPD should create an umbrella program that would operate like a search engine to allow UCPD to search and pull relevant data from the various freestanding UCPD databases.

**Finding 2:** The UCPD CAD system does not allow for easy access to stored data, and is not integrated with the UCPD's ARMS system.

**Recommendation 2A:** UCPD should utilize its seat at the table in the TriTech CAD system upgrade to ensure that access to stored CAD data is easily obtainable and meets, at a minimum, UCPD's mandated reporting functions to the state and federal governments.

**Recommendation 2B:** UCPD should research whether the new CAD system from TriTech can be integrated into ARMS. Many electronic records management systems, including ARMS, allow for an integrated CAD that imports related CAD data into the electronic records management system's incident report, thus eliminating the need for manual entry of CAD-related data to an incident report and the risk of data entry errors.

**Recommendation 2C:** If integration is not possible, UCPD should continue to use the CPD CAD because the benefits of being connected with the CPD outweigh the benefits of UCPD having its own CAD that would be integrated into ARMS.

**Finding 3:** UCPD has not obtained access to ARMS' module for Field Contacts, and instead uses a Microsoft Access database to track demographic data associated with pedestrian and traffic stops. This database, however, does not feed

into ARMS.

**Recommendation 3A:** UCPD should evaluate the ARMS module for Field Contacts, and ensure that all required data fields can be reported through the module.

**Recommendation 3B:** If the data fields are not and cannot be included, or the ARMS' module for Field Contacts utilization is otherwise undesirable, UCPD should maintain the Microsoft Access database and ensure that all data is transferred into the ICS Dashboard.

**Finding 4:** UCPD's ARMS system allows for immediate access to incident reports and records related to an incident, and can generate mandated Uniform Crime Reports and Clery Act reports. UCPD does not utilize ARMS data for regular crime, operational staffing, or performance analytics with UCPD personnel.

**Recommendation 4A:** UCPD should work with ICS and UCPD IT experts to identify standardized reporting from ARMS data in a variety of formats, such as bar graphs, pie charts and line graphs, that will assist UCPD in analyzing crime, operational staffing and performance data on various indicators, including: current period vs. prior period, current period vs. historical period, percentage totals by beats shifts and personnel, and percentage change from prior periods.

**Finding 5:** UCPD utilizes two hard copy forms to track off campus properties associated with UC students—the Dispatched Party Location Form (DPLF) and the Party Problems Form (PPF). The data contained in these form are stored in a Microsoft Access database.

**Recommendation 5A:** UCPD should determine the feasibility of integrating the DPLF and PPF databases into the ARMS system. If integration is not possible, then UCPD should continue to collect this data and ensure that the data can be imported into the ICS Dashboard.

**Finding 6:** UCPD works with ICS on crime analysis. ICS has developed a visual, analytic tool that pulls crime data from both the CAD and ARMS systems, and analyzes crime, individual officer activity, staffing levels, and overtime expenditures. The tool can pull data from several different types of database applications, including Microsoft Access, and display the data in a variety of different ways on a dashboard



customized to exhibit relevant information at different levels of responsibility with UCPD and its supervisors.

**Recommendation 6A:** UCPD should continue to work with ICS to further develop the functionality of the ICS tool and its Dashboard.

**Recommendation 6B:** UCPD should, whenever possible, capture data relative to race, gender, age and ethnicity, so as to better foster transparency and legitimacy.

**Finding 7:** Following the shooting of Samuel DuBose, UCPD revised its field contact form (now Contact Card) to collect data related to traffic and pedestrian stops. The data collected from Contact Cards is stored in a Microsoft Access database, which is missing a number of relevant data fields.

**Recommendation 7A:** UCPD should add the following fields to its database: whether the stop was a traffic or pedestrian stop, whether there was a frisk or search of the person or property, and whether force was used during the stop. The addition of these fields will assist UCPD in identifying potential problematic behavior, patterns, or trends.

**Recommendation 7B:** Stop data should be monitored regularly as part of an early warning system, surfacing potentially at-risk behavior of policy violation or biased policing.

**Finding 8:** UCPD is currently using the Guardian Tracking software to document employee performance and to flag potential patterns in employee performance for early intervention. The interface of Guardian Tracking is simple and user-friendly, but UCPD is not currently using the categories and sub-categories correctly.

**Recommendation 8A:** UCPD should continue to utilize the Guardian Tracking electronic database for documenting and tracking positive and negative aspects of employee performance.

**Recommendation 8B:** UCPD should conduct a full review of the capabilities of the Guardian Tracking system and its potential interface with the ICS tool with an eye toward including Guardian Tracking data in ICS dashboards and therefore building a more full-some early warning system.

**Finding 9:** UCPD does not have a database for the collection

of data related to internal affairs complaints, their investigation or their dispositions. UCPD procedures state only that the Internal Affairs Lieutenant should maintain a log of internal affairs complaints, but UCPD has not done so consistently.

**Recommendation 9A:** UCPD should establish an electronic database to track and maintain data related to internal affairs complaints, and can readily communicate with other UCPD databases. The ARMS system should be used if it supports the intake, investigation, and tracking of such complaints. The minimum data that should be tracked, includes: Report Number; Complainant Name, Race, Gender and Age; Accused Name, Rank, Assignment; Time and Place of Occurrence; Allegation Types; Brief Description; Investigator Name, Rank and Assignment; Complainant Arrested; Charges Filed; Investigation Status; Investigation Details, Adjudications of Each Allegation and Discipline Imposed.

**Finding 10:** UCPD does not have a database for the collection of data related to use of force incidents and only maintains hard copies of force reports and investigations.

**Recommendation 10A:** UCPD should establish an electronic database to track and maintain data related to uses of force, and investigations thereof. To the extent that the ARMS system supports use of force reporting, investigation, adjudication and tracking, and is capable of exporting of relevant data to the ICS tool, it should be utilized. The minimum data that should be tracked, includes: Report Number; Officer/Guard Information; Time and Place of Occurrence; Suspect Name, Race, Gender and Age; Criminal Allegations; Arrested; Charges Filed; Types of Force Used; Brief Description; Resisting Arrest; Weapon Used by Suspect; Injury to Officer/Guard; Injury to Suspect; Investigator Name, Rank and Assignment; Investigation Status; Investigative Reports, Adjudications of Use of Force (In Policy/Out of Policy) and Discipline Imposed.

**Finding 11:** UCPD does not utilize a regular CompStat management accountability process with UCPD personnel. UCPD Command Staff does, however, participate in bi-weekly crime reduction meetings with CPD Command Staff and UC Administrators to discuss crime trends and enforcement strategies for the UC campus and the immediate area surrounding the campus.

**Recommendation 11A:** UCPD should better integrate the data and analysis available from the ICS tool into the bi-weekly UCPD/CPD meetings and should consider adding additional UCPD command staff to the meeting.

**Recommendation 11B:** UCPD should institute a regular CompStat-like management accountability process which goes beyond just examination of crime data, analyzing other relevant information including, but not necessarily limited to: Uses of Force, Complaints, and other performance-related issues.

**Finding 12:** UCPD does not have a proactive risk management program, and does not track important performance data, including data related to internal affairs complaints and use of force incidents. Furthermore, UCPD does not effectively utilize the Guardian Tracking system to full capacity, by effectively identifying and monitoring employee performance.

**Recommendation 12A:** UCPD should leverage the technology available in the ICS tool to build a proactive risk management database, which will track and analyze risk related information and data related to a series of performance indicators.

**Recommendation 12B:** Analysis should include the crime and performance data currently available in the Dashboard in order to obtain a more holistic picture of an officer's performance.

**Recommendation 12C:** UCPD should work with ICS to establish appropriate performance thresholds triggers, including Department-Level Thresholds (e.g., three internal affairs complaints in 12 months); Peer Officer Averages (compares performance with similarly situated officers); and Performance Indicator Ratios (e.g., ratio of UOF incidents to number of arrests).

**Recommendation 12D:** UCPD should establish a protocol for the resolution of Early Warning Systems (EWS) notifications of potentially at-risk officers.

**Finding 13:** UCPD currently identifies some but not all publicly available and relevant data on its website.

**Recommendation 13A:** UCPD should consider including the following data on its website: (1) yearly totals for Part 1 and significant Part 2 crimes; (2) an incident map; (3) the Daily Crime Log; (4) pedestrian and traf-

fic stop totals broken down by demographic data; (5) use of force data broken down by type of force used and whether the force was in or out of policy (no officer names should be provided); and (6) sustained internal affairs complaints with the disciplinary action taken (no officer names should be provided).

## **Conclusion**

If implemented properly, the UCPD can utilize data collection systems to improve efficiencies and productivity, and enhance situational awareness. The existing systems appear to be maintained and supported well, from a technical perspective. However, these systems are not currently being used in a sufficiently efficient manner. UCPD is currently using several different systems for collecting and storing data, and if possible should integrate its data collection systems into one large database that tracks all of UCPD's information, or create an umbrella program that would operate like a search engine to allow UCPD to search and pull relevant data from all the UCPD databases. Further, UCPD must invest the time and resources in developing policies and training for each of its systems to ensure consistent use and application of the various systems.

## IX. Conclusion

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In the preceding findings and recommendations we have set forth the changes that, if implemented, will enable UCPD to become a model urban university police department. While the genesis of the changes laid out in these pages is a tragedy that befell the family of Samuel DuBose, with profound impact on the University, its police department, and the broader Cincinnati community, the steps outlined will help prevent such tragedies in the future and will aid in building the trust so necessary to promote both safety and fairness in our communities.

# Appendix A

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## Recommendations Matrix

While each recommendation made in this report is important to the success of reform efforts, we have, in the Recommendation Matrix that follows, attempted to provide the relative criticality of our recommendations as well as relative cost and relative degree of difficulty for each recommendation.

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
Fundamental Recommendations										
1A	Adopt a mission statement that will serve as a foundation and guidepost for its going-forward reforms.			X	X			X		
1B	In developing the mission statement, consider (1) providing for the safety and security of faculty, staff, students and visitors, (2) promotion of concepts of fairness, non-biased policing with minimal intrusion and (3) promotion of service to the broad University community			X	X			X		
2A	Establish an internal audit or inspectional service unit that reports directly to the Vice President of Safety and Reform			X		X			X	
2B	Perform on-going audits for critical areas and functions on a regular cycle to be memorialized in an annual audit plan.			X		X			X	
2C	Implement a voluntary on-going monitoring function to track each of the reforms outlined in the recommendations and ensure that they are implemented according to the agreed upon schedule			X		X		X		
3A	Update its policies and procedures to reflect campus law enforcement best practices, and assign ongoing responsibility for ensuring that they are kept current.			X						
3B	Become certified by CALEA and/or IACLEA.			X		X				X
4A	Traffic and pedestrian stops should not be used as a crime fighting tool by UCPD. Clear guidance by policy and procedure should be given as to how traffic stops should be conducted and when, if ever, off-campus traffic stops are permissible			X	X			X		
4B	Traffic and pedestrian stops should not be used as a crime fighting tool. Clear guidance by policy and procedure should be given as to when, if ever, off-campus traffic stops are permissible.			X	X			X		
5A	Adopt a policy on biased policing, clearly indicating that UCPD officers may not use race, color, ethnicity, or national origin, to any extent or degree, in conducting stops or detentions, or activities following stops or detentions, except when engaging in appropriate suspect-specific activity to identify a particular person			X	X			X		

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
5B	Develop a curriculum and institute training on the biased policing policy including training on implicit bias and shall deliver such training both to new and existing members of the department.			X		X			X	
6A	Draft and implement a single Use of Force policy that covers what force is permitted and the resulting departmental investigation and review process			X	X			X		
6B	The new Use of force policy should emphasize de-escalation and sanctity of life			X	X			X		
7A	Arm UCPD officers with CEDs			X		X			X	
7B	Include a clear policy statement governing the use of CED in the revised use of less lethal weapons policy			X	X			X		
7C	Develop intensive training on the use of CEDs and the relevant policies, including scenarios in which the utilization of CEDs is appropriate and those instances where it is not.			X		X				X
8A	Establish a protocol for the timely review of every use of force to determine its appropriateness from an administrative point of view and whether or not further investigation, including potential criminal investigation, or discipline is appropriate.			X	X			X		
9A	Update hiring policy by requiring diversity applicants throughout the police officer candidate recruitment process.			X	X					X
10A	Draft and adopt consistent policies and procedures for the development and approval of all UCPD courses and ensure that all courses are consistent with UCPD mission and philosophy.			X	X			X		
11A	Draft comprehensive Complaint Initiation Policies and Procedures that define the workflow of the different categories of complaints from investigation to adjudication.			X	X				X	
11B	Complaint Initiation Policies and Procedures should prohibit any attempt to dissuade an individual from filing a complaint, and require officers to report the misconduct of other officers.			X	X				X	
12A	Recognize the essential nature of the community affairs function within the UCPD and appropriate resources dedicated to it.			X		X		X		
12B	Infuse Community Oriented Problem Solving Policing throughout the fabric of the UCPD.			X	X			X		



RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
13A	Integrate the data collection systems into one large database that tracks all data.			X		X				X
14A	Make maximal use of UC's resources in order to fully implement the recommendations made in this report.			X		X			X	
Review of Pedestrian and Traffic Stops										
1A	Traffic and pedestrian stops should not be used as a crime fighting tool. Clear guidance by policy and procedure should be given as to when, if ever, off-campus traffic stops are permissible.			X	X			X		
1B	Involuntary off-campus pedestrian and traffic stops should only be allowed when the officers possesses reasonable suspicion to believe that a pedestrian or motorist is engaged in a criminal, non-driving offense.			X	X			X		
1C	To the extent that any safety-related off-campus traffic stops are allowed, particular scrutiny of each such stop should be applied by UCPD Administration.			X	X			X		
1D	Consider equipping officers with tablets which among other things would enable the electronic capture of stop data through an electronic version of the Field Contact Card.	X				X				X
1E	Give officers enhanced training on appropriately dealing with individuals who are stopped.			X	X			X		
2A	UCPD should continue its full implementation of the recently enacted policy on biased policing.			X	X			X		
2B	UCPD's training on the biased policing policy should include training on implicit bias and such training shall be delivered both to new and existing members of the department. In-service training on the topic shall be developed and delivered annually.			X		X			X	
3A	Develop and implement a protocol for the investigation of complaints of biased policing.			X		X			X	
3B	Train officers conducting investigations of complaints of biased policing on the protocol to be employed in such investigations.			X		X			X	
3C	OSR should audit all investigations of complaints of biased policing to ensure that they are being conducted in accordance with establish protocols for such investigations.		X		X				X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
4A	Determine appropriate levels of response and mitigative strategies, including polite explanation, to combat the negative perception created by enhanced response levels.		X		X			X		
Review of Use of Force										
1A	Combine SOP 1.3.200, and SOP 1.3.400 with SOP PE 05 into a single Use of Force policy covering when force is permitted to be used as well as the investigation and review process.			X	X			X		
1B	The new Use of force policy should emphasize de-escalation (see specific language in Report)			X	X			X		
1C	The use of force policy should define the following terms: Objectively Reasonable, Active Resistance, Passive Resistance, Serious Bodily Injury.			X	X			X		
1D	Include a revised use of force continuum or critical decision making model in the use of force policy, which makes clear that the goal of force is to de-escalate any situation, and that only the minimal amount of force necessary should be used to overcome an immediate threat or to effectuate an arrest.			X	X			X		
2A	The SOP on Use of Force should include a series of prohibitions for officer use, and discharge of a firearm.			X	X			X		
3A	A clear policy statement governing the use of less lethal weapons should be included in the revised use of force policy.			X	X			X		
3B	Include the following definitions in the revised policy to further enhance clarity. Arcing, Activation, Air Cartridge, Confetti Tags, Cycle, Display, Drive Stun, Duration, CED, Laser Painting, Probes, Probe Mode, Resistance, Active Resistance, Passive Resistance, Serious Bodily Injury, Spark Test.			X	X			X		
3C	Include a clear policy statement governing the use of CED in the revised use of less lethal weapons policy			X	X			X		
4A	Consider banning the use of the Kubotan.	X			X			X		
5A	Establish a system for the collection, storage and retrieval of data regarding uses of force by members of the UCPD.			X	X				X	
5B	Integrate the use of force data into ARMS.		X			X				X

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
6A	Establish a protocol for the timely review of every use of force to determine its appropriateness from an administrative point of view and whether or not further investigation, including potential criminal investigation, or discipline is appropriate.			X	X			X		
6B	Provide specialized training to investigators assigned to investigate police uses of force.		X			X			X	
6C	Engage an independent consultant to conduct any administrative investigation in use of force cases that result in death, officer involved shootings resulting in serious injury or death, or in-custody deaths.		X				X		X	
6D	Allow CPD, or the appropriate state agency, to conduct any criminal investigation in cases of use of force resulting in death, officer involved shootings resulting in serious injury or death, or in-custody deaths.		X		X			X		
6E	The identity of the officer(s) directly involved in the discharge of a firearm shall be released to the public within 72 hours except in cases where threats have been made toward the officer(s) involved or the department.		X		X			X		
6F	Create a Use of Force Review Board (UFRB) to review all cases where members used deadly force or deployed a CED, or any incident that results in serious injury or death.		X		X				X	
6G	The UFRB should be comprised of, at minimum, a high ranking member of UCPD appointed by the Chief of Police, a member appointed by the President of the University, a member of the student body, a patrol officer (or union representative) and a member of the neighboring University of Cincinnati community.		X		X				X	
6H	Make the findings of Officer Involved Shooting (OIS) investigation public upon completion		X		X			X		
7A	Establish training to give all members of UCPD a thorough understanding of the use of force policies and procedures.			X		X				X
8A	Hold training for sworn personnel twice annually to include live fire exercises and Reality Based Training (RBT).			X		X				X

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
8B	Crisis Intervention Team Training (CIT) should be a part of both basic recruit and in-service officer training.		X			X			X	
Review of Policies and Procedures										
1A	Update policies and procedures to reflect campus law enforcement best practices, and assign ongoing responsibility for ensuring that they are kept current.			X		X				X
1B	Establish a policy and procedure review committee consisting of a cross section of the UCPD and appropriate University resources to assist in updating and developing critical policies and procedures.		X			X			X	
1C	Work with the newly hired Organization Development Coordinator to fully implement the electronic document management software system.		X			X				X
1D	Provide the Coordinator with the resources and support necessary to meet the requirements of his position, and to implement a critical but challenging agenda.		X				X	X		
1E	Establish a procedure for the review of policies and procedures by appropriate UC personnel including the Vice President for Safety and Reform and General Counsel or his/her designee.		X		X				X	
2A	Establish adequate and consistent policies and procedures in several key critical areas including officer supervision and accountability, department transparency, effective diversity recruitment and essential goal setting to develop community trust		X		X				X	
3A	Rewrite Field Interrogations policy to require that stops be constitutional and based upon probable cause and reasonable suspicion criteria.		X		X			X		
3B	Remove problematic verbiage such as "Persons not fitting the place, time or area."		X		X			X		
3C	Clarify sections in the procedure on when an officer can conduct a "pat down" for officer safety.		X		X			X		
4A	Rewrite the Trespass Warning to articulate tenets of Constitutional policing as the basis for initiating trespassing encounters and clearly articulate probable cause and reasonable suspicion.		X		X			X		

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
4B	Remove contradictory language suggesting both that UC is “public property”, yet, “under the laws of Ohio, UC has the right to forbid a person to come onto this property.”		X		X			X		
5A	Limit the number of off-duty hours officers can work to 20-30 hours in addition to their normal work week.		X		X				X	
5B	Require UCPD approval of any collateral employment to prevent conflict of interests.	X			X				X	
6A	Require that officers complete a police/public safety officers’ bike course, and receive a certification prior to being allowed to deploy on a bicycle.	X			X			X		
7A	Rewrite the Unlawful Assemblies policy to include a section on when student assemblies can/should be deemed unlawful.	X			X			X		
8A	Rewrite the Plain Clothes Detail policy to address supervisory oversight, notification protocols (UCPD and CPD), when plain clothes details may be utilized and collateral issues to plain clothes deployment.	X			X			X		
9A	Prohibit the use of Confidential Informants (CIs) except in extraordinary circumstances with clearance at the University reporting level.	X			X			X		
10A	Rewrite the Gangs policy to focus on what specific behaviors constitute a constitutional stop or other law enforcement encounter with a gang member, and to clarify what constitutes gang activity, and how an individual becomes classified as a known gang	X			X			X		
11A	Revise Active Shooter policy so that the section on tactical responses is consistent with Multi-Assault Counter-Terrorism Capability (MACTAC)			X	X			X		
12A	Update Bomb Threats policy to incorporate the likely motivations of modern bomb threat callers and to ensure alignment with current realities of today’s domestic and foreign terrorist bombers.	X			X			X		
13A	Make Clery notifications for reportable only for Clery incidents, and make other crime data available on the University’s website		X		X			X		

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
14A	Build out a dedicated Emergency Operations Center, designed to facilitate planning and response to both planned and unplanned events in coordination with other federal, state and local agencies.		X				X		X	
Review of Officer Recruitment, Hiring, Promotion, and Retention										
1A	Update hiring policy by requiring diversity applicants throughout the police officer candidate recruitment process.			X	X					X
1B	Partner with well-established minority groups who will share and forward the UCPD's recruitment advertisements.		X			X			X	
2A	Work with officers, student population, and community members to craft a UCPD mission statement that states the reason that UCPD exists, what IT does, and reflects its basic philosophy.		X		X			X		
2B	Develop a strong employer brand that will contribute to its becoming the law enforcement employer of choice in Cincinnati.	X			X					X
3A	Expand the search for police officer candidates by partnering with well-established groups to share and forward recruitment advertisement to a broader community network.		X		X				X	
3B	Target all groups including women, Hispanic, Asian, AA and LGBTQ both in the community and on campus.		X		X				X	
3C	Increase recruitment efforts among the more diverse pool of UCPD campus security officers and other university employees who serve in different campus departments who may have demonstrated commendable performance and good judgment.		X			X			X	
3D	Ensure that recruitment campaigns reflect UCPD's commitment to diversifying and market values like community engagement, partnerships, shared responsibility for crime prevention, etc.			X	X			X		
3E	Leverage, to the greatest extent possible, its family tuition payment program, in an attempt to bring seasoned, diverse, mission-appropriate candidates into the recruitment mix.		x		X				X	
4A	Revise and update the current hiring policy to a true best practice recruitment and selection plan that acknowledges the need for diversity and sets diversity as a goal.			X	X			X		
5A	Explore the adoption of the Community Collaboration Model for recruitment.	X			X				X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
5B	Ensure that recruitment outreach is inclusive of all on and off campus communities including the LGBTQ community.		X		X			X		
5C	Carefully select and train officers who attend recruiting events like career fairs.		X			X			X	
5D	Establish recruitment ambassadors, comprised of University staff, students and community members, that will work with officers and on their own to help recruit applicants.		X		X				X	
5E	Work toward making recruitment part of UCPD officers' regular interactions with the community.		X		X				X	
6A	Track the performance of former Security Officers to assess any impact of the streamlined hiring process.		X		X				X	
6B	Use lateral and retired officers, after careful screening to ensure that their qualifications and background are consistent with the mission and philosophy of UCPD.	X				X			X	
6C	Consider a relocation bonus for lateral hires.	X				X		X		
6D	Build a process that gives priority to Cincinnati residents (1) at the beginning of a career or (2) in transition from a previous career and whose career aspirations are consistent with the mission and philosophy of UCPD.	X			X			X		
6E	Actively work with local high schools to identify and work with young people who may aspire to a career consistent with the UCPD mission and philosophy.	X				X			X	
6F	Consider creating a UCPD Police Cadet program and a student intern program.	X				X			X	
6G	Consider offering a free Candidate Applicant Preparation Program		X			X			X	
7A	Ensure that the annual evaluation process proposed in the Diversity Plan include the collection of data at every step, test, and exclusion point in the hiring process, including those who voluntarily drop out of the process. Use this data to continuously improve the hiring process.		X		X				X	
8A	Consider developing and providing support mechanisms for all applicants to reduce the number of no shows and failures.		X		X				X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
8B	Ensure that the proposed suitability assessments of the applicants to the agency is preceded by the adoption of a roadmap to change existing culture to the extent necessary to align it with that of the newly defined mission of the department.		X		X				X	
8C	The panel interview should be conducted by a diverse panel.		X		X			X		
8D	Review the process to be used by the contractor, and confirm it's been tested for bias and is aligned with the UCPD mission.		X		X			X		
8E	The annual evaluation process proposed in the Diversity plan should include the collection of data at every step, test, and exclusion point in the hiring process, including those who voluntarily drop out of the process.		X		X			X		
9A	Define the desired traits and qualifications for a supervisor, and those should be reflected in assessment center exercises, interview questions and scoring protocol.		X		X				X	
10A	Ensure that the process for promotion is evaluated annually by the Chief, Assistant Chief and Lieutenants, and consider annual review of both the promotion and career development process by both the Chief and the Director of Public Safety		X		X				X	
11A	Use students and community members in the assessment center exercises and in the interview processes.		X		X				X	
12A	Update the promotional policies and procedures to reflect the position of Sergeant.		X		X			X		
13A	Select a turnover/attrition metric to identify and react to deviations from the expected rate.		X		X				X	
13B	Enhance the recruitment and hiring process to ensure that candidates have proper expectations and are the right fit the job.		X		X				X	
13C	Conduct, maintain and analyze exit interviews in order to better understand any deviations from the expected attrition rate.		X		X				X	
Review of Training										
1A	Draft and adopt consistent policies and procedures for the development and approval of all UCPD courses and ensure that all courses are consistent with UCPD mission and philosophy.			X	X			X		



RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
1B	Ensure appropriate oversight of outside training to ensure it is consistent with Department Mission, Vision and Values.		X		X			X		
1C	Require proper tracking, and evaluation of all courses and instructors.			X	X			X		
1D	Require instructors to attend a certified instructor development course.		X		X			X		
1E	Ensure training is consistent with officer tasks and competencies to successfully serve in an urban and campus environment in a manner consistent with Department Mission, Vision and Values.			X	X			X		
1F	Establish and maintain a "lessons learned" program.		X		X				X	
1G	Establish a Training Committee responsible for review of training policies and procedures, curricula development and course		X			X			X	
1H	Ensure that training opportunities are available to all employees both sworn and unsworn.		X		X			X		
2A	Locate the training office within headquarters and create a state of the art on-campus learning environment by identifying a professional setting for in-service training.		X			X			X	
3A	Develop a portion of the 80-hour class in an e-learning format, to be delivered immediately upon swearing in, so as to allow for appropriate orientation before the commencement of patrol functions.		X			X				X
4A	Develop introductory curricula, with time allotment and method of delivery (e-learning versus classroom) for the Clery Act; Mission, Vision and Values of UCPD; and community relations for inclusion in orientation training.		X			X		X		
5A	Design courses to specifically meet unique training needs including courses addressing the unique intersection of urban and university policing, and training designed to promote effective interactions with diverse populations.		X		X				X	
6A	Build on the recommendations of this report relative to needs assessment and conduct a formal review of training, to be repeated on an annual basis.		X				X		X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
6B	Develop an annual training plan consisting of goals and strategy based on an annual formal needs assessment, with input from the Chief of Police, a training committee comprised of UCPD personnel, training unit officer-in-charge, and the community.			X			X		X	
7A	Develop as part of the annual training plan a mandatory training curriculum in modular format, to be reviewed and modified annually, including the state-mandated training as well as those courses which are determined to be best suited for UCPD-mandated annual training.		X			X			X	
7B	Infuse the curriculum developed with elements of community policing, including a clear and unified message as to the UCPD's commitment to community policing, as well as with critical thinking and problem solving skills training throughout.		X		X			X		
7C	Develop a series of elective courses in different relevant subject matter areas all of which would have to be completed over a three year period.		X			X			X	
7D	Consider courses for the mandatory training that include updates on trends and innovations in both municipal and university policing, an update on Ohio criminal law, a use of force update including de-escalation techniques, community and problem solving policing updates, and anti-bias training.	X			X			X		
7E	Elective courses should include: Community-police relations; Building partnerships with communities both on and off campus; Critical thinking and problem solving; Ethics and Integrity; Diversity; Biased policing; Substance Abuse; Date rape; Leadership; De-escalation skills through the perishable skills training (defensive tactics, firearms, driving and communication skills); Equal Employment Opportunity; Interactions with persons with mental illness.		X		X			X		
7F	Determine the appropriate split of total mandatory annual training hours between mandatory and elective courses.		X		X			X		

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
7G	Increase diversity and biased policing training and require these subject to be recurrent training annually.			X		X		X		
7H	Centralize and maintain records of all training in an electronic format which becomes part of an Officer's personnel package		X		X			X		
8A	Develop a process by which UCPD develops its curricula.		X			X				X
9A	Establish a lessons learned program, derived from UCPD uses of force, post-incident debriefings, employee suggestions, personnel complaints and case law updates.		X		X				X	
10A	Develop a list of tasks and skill competencies expected of an FTO.		X		X			X		
10B	Create a selection process to assess whether an applicant has the skills necessary to train new officers.		X			X			X	
10C	Ensure that all FTO's support the Mission, Vision and Values of UCPD and will be a strong role model for new employees.		X		X				X	
10D	Ensure that the selection process includes a detailed review of the disciplinary and merit file of the candidate.		X		X			X		
10E	Ensure that there is a policy that requires a timely suitability review of any FTO in the case of a sustained complaint involving		X		X				X	
11A	Require instructors to be OPOTC Certified Instructors.		X		X			X		
12A	Require all courses taught by UCPD instructors to have written lesson plans that include clearly stated, realistic performance objectives and learning activities that utilize multiple learning modalities.		X		X			X		
12B	Base the training approach on the tenets of adult education, promoting decision-making and critical thinking.	X			X			X		
12C	Develop problem-based scenarios and case studies that allow the student to apply problem solving skills & knowledge of diverse populations.	X			X				X	
12D	Require curriculum review before a class is taught.		X			X			X	
12E	Observe instructors and rate performance.		X			X			X	
12F	Survey students relative to the performance of their instructor.	X			X			X		
13A	Ensure that community relations issues are included in use of force courses and that unique campus life issues are included in the defensive tactics course.		X		X			X		

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
14A	Require by policy that all non-UCPD training be reviewed and approved prior to authorizing attendance at such program, and that a syllabus of such training be obtained for inclusion in the attending employee's file.		X		X			X		
15A	Ensure that the training lieutenant is devoted primarily, if not exclusively, to all of the tasks attendant to training.		X		X			X		
15B	Re-establish the Training Review Committee under the direction of the training lieutenant and include a member from the university and two members from the community.		X			X		X		
15C	Ensure that an annual Continuing Education Plan and Learning Needs Assessment is conducted.	X			X			X		
15D	Review, approve, and maintain the curriculum of every outside course approved for attendance by a UCPD officer.	X			X				X	
16A	Obtain a Learning Management System (LMS) to track all training records, retain expanded course outlines and lesson plans, allow for automated employee training requests and approvals.		X			X			X	
16B	Use best practice templates to design training, evaluate training delivery and instructors.		X		X			X		
16C	Complete regular assessments of courses and training delivery. Ensure curricula includes relevant and realistic officer tasks and competencies.		X			X			X	
16D	Training Unit lieutenant should approve all internal courses and lesson plans, and approve all outside courses prior to employees being allowed to attend to ensure consistency with UCPD policies, procedures, and agency mission, vision and values.	X			X			X		
17A	Identify the actual training budget for equipment and off-site training each year and hold the department accountable for working within its training budget.		X		X				X	
18A	Develop a policy with respect to the selection of instructors and for the evaluation of their performance.		X		X				X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
19A	Develop a policy which charges the training lieutenant with mandatory attendance (either by himself or an appropriate designee) of training in order to evaluate, in writing, its effectiveness.	X				X				X
20A	Extensively collaborate with the University on issues of training and should consider the creation of a Community-Police Academy for surrounding communities and a Student Community-Police Academy for campus communities.	X			X					X
21A	Collaborate with CPD on issues of training	X			X			X		
22A	Utilizing the Claremont Campus OPOTC-certified Police Academy as its own internal academy where sponsored/hired cadets could attend.	X			X			X		
<b>Review of Accountability Mechanisms</b>										
1A	Each of the three patrol shifts should be made up of two squads of officers, with each squad having a permanently assigned sergeant who works the same rotating schedules as their officers.		X		X				X	
1B	Consider redesigning the Organization chart so that it is comprised of sub charts showing Field Operations and Support Services in greater detail, and should be updated to reflect latest changes and clearly reflect each squad sergeant and the officers assigned to the squad.		X		X				X	
1C	Conduct a comprehensive review of the patrol chart to determine if it deploys the patrol force and the supervisors in the most effective manner.	X				X			X	
2A	Finalize the Managing Performance and Early Intervention policy and procedure that documents the use of Guardian Tracking.		X			X			X	
3A	Develop a list of critical duties and responsibilities for these positions.		X		X			X		
3B	Consider requiring that patrol sergeants perform documented visits, preferably in the field, to each subordinate during their shift.	X			X					X
4A	Implement a quality control process to ensure compliance with the performance evaluation requirements, and incorporate related duties on the list of supervisor responsibilities.		X			X				X

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
5A	Draft Complaint Initiation Policies and Procedures that (a) call out the different methods of initiating/receiving complaints; (b) allow for the receipt of anonymous complaints; (c) provide for walk-in complaints at UCPD headquarters; (d) prohibit any attempt to dissuade an individual from filing a complaint; (e) requires appropriate notification from UC General Counsel anytime a lawsuit alleging police misconduct is filed; (f) requires notification to UCPD by any officer who is arrested or otherwise criminally charged or the subject of a lawsuit that alleges physical violence, threats of physical violence or domestic violence; (g) requires officers to report the misconduct of other officers including improper use or threatened use of force, false arrest, unlawful search or seizure, or perjury; and (h) allows for the processing of internally generated			X	X				X	
5B	Draft Complaint Investigation Policies and Procedures that (a) requires the categorization of complaints; (b) defines the workflow of the different categories of complaints from investigation to adjudication; (c) provides time frames for the investigative process; and (d) establishes complaint investigation protocols.			X	X				X	
5C	Draft Complaint Adjudication Policies and Procedures that (a) set forth the standard of proof; (b) prohibit automatic credibility preference being given to an officer's recitation of facts; (c) define the categories of potential disposition; (d) define the timeframe in which adjudication should be completed.			X	X				X	
6A	Compile complaint information into a simple database, which can be accessed by the ICS system, and includes several fields (year, date of complaint, nature of the complaint, employee, investigating supervisor, disposition and date completed).		X			X			X	
7A	Develop brochures, in hard copy and for inclusion on UCPD's website, about the complaint process and complaint forms and make such materials available and include as a requirement in a new SOP governing civilian complaints.			X		X			X	
8A	Consider establishing a subgroup of the CAC to review the UCPD'S investigation of complaints made against employees.		X			X		X		

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
9A	Create a separate SOP detailing how disciplinary matters should be handled by UCPD. Such a procedure should include creating a form that summarizes details of an allegation of misconduct and creates a log listing the number of the issue starting at 001 of year and including the name of the employee, the dereliction charged, the name of the supervisor reporting and/or investigating the matter and the date adjudicated.		X		X				X	
10A	Establish an Inspectional Services or Audit unit, reporting directly to the Vice President for Public Safety and Reform.			X		X				X
11A	Enter into a voluntary independent monitorship which would provide regular status updates to the Board of Trustees and the public relative to the progression of reform within the Department		X				X	X		
Review of Community Engagement, Problem-Oriented Policing and Crime Prevention										
1A	Recognize the essential nature of the community affairs function within the UCPD and appropriate resources dedicated to it.			X		X		X		
1B	The Community Affairs organization should be elevated to a more prominent position in the organization and should be staffed appropriately.		X				X		X	
1C	Create a separate Community Affairs Office which reports directly to the Chief, thereby exercising greater authority across the organization.		X			X			X	
1D	Rescind the existing SOPs and write new policies and procedures to reflect the new structure and mission of the unit.		X		X				X	
1E	Consider whether the Victim Services Coordinator belongs in the Community Affairs Office or whether it might be more appropriately housed elsewhere within UCPD or the University.		X		X				X	
2A	The Community Affairs Office should be managed by a supervisor with formal operational authority to manage all of the various components of the Community Affairs mission.		X			X			X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
2B	The supervisor position could either be a civilian title, e.g., Director, or a uniformed title, e.g., Captain but should be of sufficient stature as to be able to coordinate resources across the organization, particularly those resources that are not specifically assigned to Community Affairs duties.		X		X				X	
2C	Staff the Community Affairs Office with a minimum of two officers whose sole responsibilities are community affairs duties.		X			X		X		
2D	Consider assigning officers as community liaisons to designated community groups.		X			X			X	
2E	Consider revising the provision of the Collective Bargaining Agreement that prescribes a four year rotation period for CAO's.		X		X				X	
2F	Design and implement a selection process for the Community Engagement Officers which evaluates candidates against the specific qualifications necessary for effective performance of the function, and includes the opportunity for community and student		X			X			X	
3A	Provide Community Affairs Office staff with specialized training on public speaking, crime prevention, labor relations, and social media	X				X				X
4A	Establish the supervisory position of Event Coordinator, with appropriate staff		X		X				X	
5A	Train personnel in a community policing problem solving model.		X			X			X	
5B	Consider adopting the CAPRA community policing problem solving model.	X			X					X
5C	Develop a problem solving approach to chronic crime and disorder problems.		X		X					X
5D	If UCPD continues to patrol off campus, then problem-solving groups should also involve community residents and CPD.		X		X					X
5E	Develop a policy that outlines the problem-solving program, and contain clear roles, responsibilities and expectations regarding the UCPD's problem-solving efforts.	X			X					X
6A	Increase the number of CCTV cameras deployed in both the on and off campus communities, and collaborate with the CPD to identify strategic locations to place the additional cameras.	X					X		X	



RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
6B	Institute a 'Safe Haven' program whereby local businesses register with UCPD, agree to display a distinctive logo on their storefronts that identifies them as a Safe Haven, and pledge to assist University affiliates in distress.	X					X		X	
6C	Consider implementing Operation Blue Light, a program that authorizes UCPD personnel to mark property with an invisible ink discernible only under a special blue light.	X					X		X	
6D	Consider implementing Operation ID, a nationwide program that aims to deter theft by permanently identifying valuable property with an indelible, inconspicuous, specially assigned number.	X					X		X	
6E	Consider implementing PC PhoneHome/Mac PhoneHome, a program that allows authorities to locate a lost or stolen computer by identifying its location when the machine is connected to the Internet.	X					X		X	
6F	Consider employing Stop Theft Tags, which possess a unique ID number that is entered into the STOPTHEFT worldwide database, and allow lost or stolen property to be reunited with its owner.	X				X			X	
6G	Look into Bicycle Registration, where a permanent decal is affixed to the bicycle, thus giving it a unique ID number that is registered with the UCPD.	X				X			X	
Review of Encounters with Individuals with Mental Health Concerns										
1A	Establish clearly written policies and procedures based upon existing best practices used by campus police departments.			X	X				X	
1B	Include in the new policy a list of generalized signs and symptoms of behavior that may suggest mental illness.		X		X				X	
1C	Include in the new policy should a list of indicators that will help an officer determine whether an apparently mentally ill person represents an immediate or potential danger.		X		X				X	
1D	The new policy should include guidelines for officers to follow when dealing with persons they suspect are mentally ill.		X		X				X	
1E	Review applicable reports from other jurisdictions, including the USC and LA Mental Health Advisory Board, and incorporate suggestions from those reports in policies, procedures and training.	X			X				X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
2A	Implement a Student Concerns Committee that consists of first responders and those potentially in a position to take notice of irrational student behavior.		X			X				X
2B	The Student Concerns Committee should meet on a weekly basis to discuss issues that took place during the previous week and are potentially related to mental health, and collaboratively create a plan of action.		X			X				X
3A	Ensure that additional officers trained in crisis intervention are deployed during potential peak periods of stress for students.		X			X			X	
4A	Provide all sworn officers with CIT, and with documented refresher training on a bi-annual basis.		X			X			X	
4B	Utilize UCMC experts to educate officers on issues specific to student populations, particularly those within the University community, including sensitivity training highlighting the position of students who are away from home for the first time.		X			X			X	
4C	Consider establishing proactive response teams pairing an on-call UCMC clinician with a law enforcement officer to provide emergency field response to situations involving mentally ill, violent or high risk individuals.	X			X				X	
5A	After every encounter with an individual suffering from a mental illness, UCPD should mandate detailed reporting for inclusion in the ARMS system.		X		X			X		
5B	In order to improve performance, annually audit the handling of mental health-related calls and incidents for that year.		X		X			X		
<b>Review of Equipment</b>										
1A	Re-deploy CEDs.		X				X	X		
1B	Review policies and procedures related to the use of CEDs to include when the use of the devices is authorized and the allowable number of discharges of the device.			X	X				X	
1C	Develop intensive training on the use of CEDs and the relevant policies, including scenarios in which the utilization of CEDs is appropriate and those instances where it is not.			X		X				X

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
1D	Designate a CED training officer, who should receive training as a trainer and whose responsibilities should include remaining current on all relevant literature and data on the use of CEDs.			X	X			X		
2A	Work with CPD and appropriate neighborhood organizations to provide significantly greater deployment of video surveillance in the off-campus patrol areas.		X				X		X	
3A	Conduct a review of all existing video surveillance equipment in conjunction with the exploration of an off-campus video system.		X				X		X	
4A	Develop or adopt appropriate training for the use of the batons, and ensure that every member of UCPD receive such training.		X			X				X
5A	Evaluate and choose an automated commercial off-the-shelf product for tracking of all equipment.		X				X		X	
6A	Evaluate the need and potential utilization of the bomb robot.	X			X				X	
6B	If there is justification to retain the robot, appropriate initial and refresher training and qualification of a select group of sworn officers on the utilization of the robot and related skill sets including bomb disposal should be developed and deployed.	X				X				X
7A	Evaluate the need and potential utilization of the sniper rifle.	X			X				X	
7B	If there is justification to retain the rifle, appropriate initial and refresher training and qualification of a select group of sworn officers on the utilization of the rifle should be developed and	X				X			X	
8A	Consider installing in-car video as an adjunct to the current deployment of body cams, providing for potential additional views of and redundancy in any critical incident.	X					X		X	
9A	Work with the Director of Emergency Management to build out a dedicated Emergency Operations Center, designed to facilitate planning and response to both planned and unplanned campus events in coordination with other federal, state and local agencies.		X				X			X
Review of Technology										
1A	Require that each officer create a test recording before they deploy to the field each day to ensure the body camera is functional.	X			X				X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
1B	Re-write Body cam policy to address how to specifically handle video in use of force (i.e., who takes custody of the camera, who reviews the video, when should an officer review video, etc.).		X		X			X		
1C	Those developing the body camera policy should continue to refine and improve the policy as lessons are learned, and collaborate with other agencies that have deployed cameras to learn from those experiences.		X		X			X		
1D	Consider including the body camera policy as a topic of discussion in community forums, student body meetings, etc.		X		X			X		
2A	Consult a subject matter expert to assist in negotiating an agreement for cameras and storage so that it includes discounted pricing; a "termination for convenience" clause; the appropriate level of on site training and support from Taser; etc..	X					X			X
2B	UCPD should identify any video in storage that must be retained into the future, and work with Taser to migrate that video to Evidence.com for long-term storage.	X				X			X	
2C	Consider engaging a provider for additional system training, to ensure the Department is making full use of its video management system	X					X		X	
3A	Modify the practice of tagging video with only a suspect's name. Instead, it should consider utilizing additional identifiers, such as the CAD incident number and/or an RMS record number.	X			X			X		
3B	Consider contracting with a vendor that allows for CA integration with its video management system.	X				X			X	
4A	Ensure that all business/functional requirements for ARMS are clearly documented and that testing of the upgraded ARMS is conducted against those requirements before the system is accepted.		X			X			X	
5A	Consider implementing an ARMS Mobile Product on MDCs and/or tablets to enable officers to complete reports from the field.		X			X			X	
6A	Add a radio console to the third position so it can be in a position to handle multiple calls/traffic at one time.	X				X			X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
7A	Implement a 9-1-1 system that provides the actual geo location of the call, as is standard in dispatch centers across the country.		X				X		X	
8A	Explore ways to expand adoption of Live Safe on campus and potentially off-campus as well.	X			X			X		
9A	Identify funding for a replacement card access system.	X					X		X	
9B	PSTS should document the requirements for a replacement system, which should include a plan for how to integrate the card access system with an existing key management system that was developed in-house.	X					X			X
10A	Consider adding one IT Project Manager to PSTS staff to ensure large IT projects are implemented according to IT management best practices.	X				X			X	
10B	PSTS should engage in a study to determine the appropriate IT staffing levels. It appears that additional Technicians are likely required to support the IT needs of the Department.	X					X			X
Review of Data Collection Systems, Data Usage, Automation, and Records Management										
1A	Integrate all data collection systems into one large database that tracks all of UCPD's information.		X			X				X
2A	Ensure that access to stored CAD data is easily obtainable and meets UCPD's mandated reporting functions to the state and federal governments		X			X			X	
2B	Research whether the new CAD system from TriTech can be integrated into ARMS, and integrate if possible.		X		X				X	
2C	If integration is not possible, continue to use the CPD CAD.	X			X			X		
3A	Evaluate the ARMS module for Field Contacts, and ensure that all required data fields can be reported through the module.		X			X			X	
3B	If the data fields can not be included or the ARMS' module for Field Contacts utilization is otherwise undesirable, maintain the MAD and ensure that all data is transferred into the ICS Dashboard.	X				X			X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
4A	Work with ICS and UCPD IT experts to identify standardized reporting from ARMS data in a variety of formats, such as bar graphs, pie charts and line graphs, that will assist UCPD in analyzing crime, operational, staffing and performance data on various indicators.		X			X			X	
5A	Integrate the DPLF and PPF MADs into the ARMS system. If integration is not possible, continue to collect this data and ensure that the data can be exported into the ICS Dashboard.	X			X				X	
6A	Work with ICS to further develop the functionality of the	X				X			X	
6B	Capture data relative to race, gender, age and ethnicity, so as to better foster transparency and legitimacy.		X			X			X	
7A	Add the following fields to its MAD: whether the stop was a traffic or pedestrian stop, whether there was a frisk or search of the person or property, and whether force was used during the stop.		X		X			X		
7B	Monitor stop data regularly as part of an early warning system, surfacing potentially at-risk behavior of policy violation or biased policing.		X		X				X	
8A	Continue to utilize the Guardian Tracking electronic database for documenting and tracking positive and negative aspects of employee performance.	X			X			X		
8B	Conduct a thorough review of the capabilities of the Guardian Tracking system and its potential interface with the ICS Dashboard, so as to allow for inclusion of Guardian Tracking data in ICS dashboards and more fulsome early warning system.		X			X				X
9A	Establish an electronic database to track and maintain data related to internal affairs complaints, and can readily communicate with other UCPD databases (ARMS).		X			X				X
10A	Establish an electronic database to track and maintain data related to uses of force, and investigations thereof, and can readily communicate with other UCPD databases (ARMS).		X			X				X
11A	Integrate the data and analysis available from the ICS tool into bi-weekly meetings and consider adding additional UCPD command staff to the meeting.	X				X			X	

RECOMMENDATION MATRIX		RELATIVE CRITICALITY			RELATIVE COST			RELATIVE DIFFICULTY		
		LOW	MED	HIGH	LOW	MED	HIGH	LOW	MED	HIGH
11B	Institute a regular Compstat-like process which goes beyond just examination of crime data, analyzing other relevant information including Uses of Force, Complaints, and other performance-related issues		X			X			X	
12A	UCPD should leverage the technology available in the ICS Dashboard to build a proactive risk management database, which will track and analyze risk related information, and data related to a series of performance indicators.		X			X				X
12B	Analysis should include the crime and performance data currently available in the Dashboard in order to obtain a more holistic picture of an officer's performance.		X		X				X	
12C	Work with ICS to establish appropriate performance thresholds triggers, including Department-Level Thresholds (e.g., 3 internal affairs complaints in 12 months); Peer Officer Averages (compares performance with similarly situated officers); and Performance Indicator Ratios (e.g., ratio of UOF incidents to # of arrests).		X		X				X	
12D	Establish a protocol for the resolution of EWS notifications of potentially at risk officers.		X		X				X	
13A	Consider including the following data on its website: (1) yearly totals for Part 1 and significant Part 2 crimes; (2) an incident map; (3) the Daily Crime Log; (4) pedestrian and traffic stop totals broken down by demographic data; (5) use of force data broken down by type of force used and whether the force was in or out of policy (no officer names should be provided); and (6) sustained internal affairs complaints with the disciplinary action taken (no officer names should be provided).	X			X			X		

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