



# COMPLIANCE EVALUATOR REPORT

August 2023

O'Toole Associates, LLC  
[www.spdcompliance.com](http://www.spdcompliance.com)

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## Letter from the Lead Compliance Evaluator

I am pleased to share the Compliance Evaluator Team's second report that builds on our initial assessment published in February 2023 and covers developments during the first two quarters of this calendar year. My team and I continue to engage collaboratively with representatives from the City of Springfield, MA, the Springfield Police Department, the United States Department of Justice Civil Rights Division, and the U.S. Attorney's Office District of Massachusetts as the parties work to implement the requirements delineated in the [Settlement Agreement](#) filed on April 13, 2022. I commend those involved in this effort for their outstanding work ethic and commitment to this project.

Once again, we express our sincere thanks to members of the Springfield community for engaging with our team and supporting our efforts. Your voices have been heard and your input and feedback have been integral to our work. Your assistance in organizing remote and in-person opportunities to engage with those living and working in Springfield has been invaluable.

As explained in our first report, I've personally witnessed police reform from several perspectives - as a police chief, government official, monitor, and consultant. As the result, I am optimistic that these substantive reforms will benefit the Springfield Police Department and the diverse community it serves. We have already witnessed significant policy changes related to use of force that provide clearer direction to officers. In-service training that aligns with adult learning principles, including live scenarios, has been developed and delivered to officers and supervisors to guide their actions and test their understanding of the new policies. Manuals that outline governance, policies and procedures of the Board of Police Commissioners and the Internal Investigations Unit are nearing completion following public comment. A new Force Investigation Team (FIT) policy and manual are currently being finalized. An electronic tracking system for officer training is nearing completion. The City is also developing training for the Board of Police Commissioners. With input from community stakeholders, the SPD is updating its engagement and information sharing strategy. Employee wellness programs are being evaluated to ensure personnel who experience psychological and physical trauma related to their stressful work receive quality services. These developments and other reforms will enhance accountability and underpin a system that is fair to officers and responsive to community members. As stated in our first report, desired outcomes in this process include "increased professionalism, enhanced public trust, improvements in police morale, and safer neighborhoods."

My team and I report our findings to Magistrate Judge Katherine Robertson during quarterly status hearings that include the parties and are open to the public. We will also continue to produce written semi-annual reports that will summarize my team's assessment of progress during the preceding six months as measured against requirements in the Settlement Agreement and our annual monitoring plans. The reports will also highlight priorities going forward.

We hope you find this report interesting and helpful. Please don't hesitate to [contact our team](#) with questions, comments, and suggestions. Again, thanks to the parties' representatives for their very hard work and to community members for your interest and contributions.

Sincerely,



Kathleen O'Toole  
Lead Compliance Evaluator

## Compliance Evaluator Team Biographies

The biographies of Kathleen O’Toole, Rodney Monroe, and Natalia Delgado are provided below for the benefit of those who have not previously followed this process. We’re pleased to announce the addition of Michael Teeter to the team. Mike’s particular focus will be on force investigation and the assessment of use of force cases.



### Kathleen M. O'Toole | Lead Compliance Evaluator

O’Toole is a lawyer and career police officer who has earned an international reputation for her principled leadership and reform efforts. She currently serves as president of O’Toole Associates, LLC and as a partner at 21st Century Policing Solutions.

In 2018, O’Toole completed her service as Chief of Police in Seattle, Washington where she led the Seattle Police Department through a major transformation project. In addition to addressing the requirements of a settlement agreement between the US Department of Justice and the City, she introduced leading-edge business practices and operational strategies that reduced crime and enhanced community trust.

O’Toole also chaired the Commission on the Future of Policing in Ireland. In September 2018, the Commission presented its findings and recommendations for sweeping reforms to An Garda Síochána, the Irish national police service. She had previously served a six-year term as Chief Inspector of the Garda Síochána Inspectorate, an oversight body responsible for advising the Irish Minister of Justice and recommending best practices for policing and security.

Earlier in her career, O’Toole rose through the ranks of local and state policing in Massachusetts. She began her career as a beat cop in the Boston Police Department and was assigned to numerous patrol, investigative, undercover, supervisory and management positions. She served as Superintendent (Chief) of the Metropolitan District Commission Police and Lieutenant Colonel overseeing Special Operations in the Massachusetts State Police. She was later appointed Massachusetts Secretary of Public Safety and Boston Police Commissioner.

O’Toole has worked on other high-profile reform projects. In 1998-1999, she was a member of the Independent Commission on Policing in Northern Ireland (The Patten Commission). The Commission published recommendations that transformed policing there as part of the Peace Process. In 2009, she served on a four-person panel that created the blueprint for reforming the Northern Ireland Prison Service. She was a member of the Independent Commission on Policing in England and Wales that published findings in late 2013. She also served as Joint Compliance Expert overseeing an agreement between the US Department of Justice and the Town of East Haven, CT to ensure constitutional policing. She continues to serve as a consultant to USDOJ and several state and local government agencies.

O’Toole earned a BA from Boston College, JD from New England School of Law, and PhD from the Business School of Trinity College Dublin. She is a life member and served on the board of directors of the International Association of Chiefs of Police. She also served as a board member and treasurer of the Police Executive Research Forum.



### Rodney D. Monroe | Compliance Evaluator

Retired Chief Rodney Monroe is an accomplished and highly respected subject matter expert in community policing and police reform. With over 40 years of experience in law enforcement, retiring as Assistant Chief of Police in Washington, D.C., and continuing to serve as Chief of Police for 15 years in three cities, he is now sharing valuable knowledge and expertise with various law enforcement entities.

Under his leadership as Chief of Police in Charlotte, NC, Richmond, VA, and Macon, GA, historical reductions in violent crime were reached. These departments also experienced a significant increase in police and community relationships through the development and implementation of innovative programs and engagements.

Chief Monroe continues his police reform efforts by partnering with noted professional organizations providing consulting services and subject matter expertise in collaborative reform projects, critical incident reviews, violence reduction projects, body worn camera programs, and the handling of mass demonstrations and special events.

He served as Monitor for Department of Justice Federal Consent Decree in Meridian, MS. He currently serves as the Deputy Monitor for the Chicago Police Department's Consent Decree. His focus areas include, Use of Force, Accountability/Transparency, Supervision, Training, Officer Wellness and Safety, and Hiring, Recruitment, and Promotion.

Chief Monroe has served as an Expert for the USDOJ Civil Rights Division in conducting Pattern and Practices investigations in the Louisville Metro Police Department and the Mt. Vernon Police Department.

Additionally, Chief Monroe has provided subject matter expertise on several other projects, including: conducting a Racial Bias Audit for the City of Charleston, SC; North Charleston Collaborative Reform; and, Minneapolis Critical Incident Review. Chief Monroe currently serves as a Strategic Site Liaison for the Department of Justice, Bureau of Justice Assistance National Public Safety Partnership (PSP), National Body Worn Camera Program, and Safer Neighborhoods through Precision Policing Initiative (SNPPI) TTA programs.



### Natalia M. Delgado | Compliance Evaluator

Attorney Natalia Delgado left private practice in 2009 to begin her career in government, serving as Associate General Counsel with the Office of Illinois Governor Pat Quinn. Delgado had principal responsibility for addressing the legal issues of several State boards and agencies, including the Illinois State Police, Prisoner Review Board, and the Department of Corrections. In addition, Delgado managed Executive Clemency, leading a team reviewing petitions and making recommendations to the Governor, ultimately acting on nearly 5,000

petitions.

Delgado went on to serve as Deputy General Counsel and Chief of Litigation for the Illinois State Police. Her responsibilities included managing the litigation pending against the Department and its officers, prosecuting officers administratively for alleged policy violations, making policy recommendations,

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drafting proposed legislation, and testifying before the legislature. Delgado also created curriculum and provided training to sworn officers and forensic scientists on various topics including Civil Rights & Civil Liabilities, Responsibilities of Field Training Officers, Search & Seizure, Bias Based Policing and Civil Deposition Preparation. While there, Delgado received a Meritorious Service Medal, awarded for outstanding achievements contributing to the efficiency and effectiveness of the Department.

Delgado next served as Deputy Director of Policy at the Cook County State's Attorney's Office, where she coordinated the planning, development and execution of several new policy and research efforts. Delgado leveraged relationships with law enforcement partners and advocates to educate and train on new initiatives and developed multidisciplinary teams to coordinate investigations and support services.

Delgado went on to serve as City Prosecutor in the City of Chicago, managing the attorneys and department responsible for prosecuting criminal and administrative violations of the Chicago Municipal Code. Delgado's practice also included civil defense of Freedom of Information Act litigation pending against City Departments in circuit court.

Delgado currently serves as General Counsel for the Illinois Commerce Commission, the state agency responsible for overseeing electric, natural gas, telecommunications, water and sewer public utility companies in the state. The Commission employs close to 300 people and operates with an annual budget of approximately 65 million dollars.

Delgado received a Bachelor of Arts Degree from Colgate University and a Juris Doctor from DePaul University School of Law. She is bilingual in Spanish and English.



[Michael Teeter | Compliance Evaluator](#)

Mike Teeter is an educator and career police officer who serves as a police practices expert providing training, consulting, and expert witness services related to leadership, use of force, policy, significant incidents, accountability, human resources, and training. He uses the extensive experience garnered leading force investigations, training, policy development, human resources, and force review boards for the Seattle Police Department during Seattle's reform journey to help other organizations improve and reform their processes, practices, training, and leadership development. The overall goal of Teeter's work is to improve public trust and confidence in law enforcement through meaningful reform, timely and relevant training, solid supervision and effective accountability systems and measures including thorough, objective, and transparent investigations of police actions. In addition to building community trust and confidence, this work is intended to improve professionalism, wellness, and officer safety and ultimately, to reduce force related injuries and deaths recognizing the sanctity of human life.

Teeter rose through the ranks of the Seattle Police Department where he served for nearly 30 years before retiring in 2022 as a Captain. He has a broad range of experience which has prepared him to serve others as a consultant and expert, and to teach current and aspiring criminal justice professionals. In addition to the assignments noted above, Teeter commanded the Seattle Police West Precinct, leading a team of 200 sworn officers providing front line police services to a daytime population exceeding 260,000 in the heart of Seattle's downtown and tourist core. Other roles he's held in his career include impaired driving enforcement, drug recognition expert (DRE), field training officer (FTO), internal investigations sergeant and lieutenant, patrol sergeant and shift commander, and recruiting/background investigation lieutenant.

Teeter is now serving as the Graduate Program Director for Salve Regina University's online criminal justice and cybersecurity program. He teaches graduate level criminal justice courses, advises students and is responsible for the overall content and quality of this very popular degree program.

In addition to his work at Salve Regina, Teeter's current consulting work includes serving as an expert witness in police deadly force incidents, serving on the Springfield Compliance Evaluator team, and conducting leadership training for the Washington DC Metropolitan Police Department and Washington State police leaders.

Teeter earned two Bachelor of Science Degrees from the University of Washington and a Master of Science Degree from the University of Southern California.

## Context

The following synopsis, also provided in the intro to the first Compliance Evaluator Team (CET) report provides the overall context for our work:

On Wednesday, April 13, 2022, the United States Department of Justice Civil Rights Division (“DOJ”) and the United States Attorney’s Office for the District of Massachusetts (“USAO”) filed in U.S. District Court a complaint and proposed consent decree (“Settlement Agreement” or “Agreement”) with the City of Springfield, MA (City). This action was the culmination of an investigation, originally launched in April 2018, that concluded the Springfield Police Department’s (“SPD”) Narcotics Bureau engaged in a pattern or practice of excessive force that deprived individuals of their rights under the Fourth Amendment to the U.S. Constitution.

The DOJ investigation and subsequent Settlement Agreement focus primarily on the use of excessive force. The comprehensive, sixty-nine-page agreement outlines desired reforms that will improve policies, training and accountability related to SPD officers’ use of force. As stated in the press release issued by the Department of Justice on the day of the filing:

“The improvements will ensure that officers avoid force whenever possible through the use of de-escalation tactics; that officers know when force can and cannot be used; and that officers report all instances where force is used. In addition, the Springfield Police Department will provide better supervision of officers and improve internal investigations of complaints of officer misconduct. When officers violate use-of-force policies, the agreement will ensure that the Springfield Police Department holds officers accountable.”

The Agreement required the parties to recommend a monitor, known as “Compliance Evaluator,” to be appointed by the federal judge overseeing the Agreement, Magistrate Judge Katherine A. Robertson, U.S. District Court, District of Massachusetts. Following a rigorous and competitive process, O’Toole Associates, LLC was ultimately selected for the role and appointed by Judge Robertson on August 1, 2022. Kathleen O’Toole, the company’s founder and president, serves as lead compliance evaluator, assisted by Rodney Monroe, Natalia Delgado, and Michael Teeter who serve as deputy compliance evaluators. Collectively, this group is now referred to as the Compliance Evaluator Team (“CET”).

As the objective representative of the Court, the CET is required to assess and report whether the requirements of the Agreement have been met and if implementation is producing the desired result - constitutional and effective policing. The CET also works with the parties to identify any barriers to compliance and provides technical assistance to SPD to overcome such barriers.

As required in Paragraph 194 of the Agreement, prior to the appointment of the CET, DOJ and the City agreed on a detailed outline of key benchmarks for implementation of the Agreement. Also pursuant to that same paragraph, within ninety days of appointment, the CET developed its first year Compliance Plan that was agreed to by the parties and filed with the Court on October 21, 2022. **See Appendix A: First Year Compliance Evaluator Plan.**

Under Paragraph 196 of the Agreement, the CET is also required to conduct a review every six months to determine if the city and the SPD have met the requirements of the Agreement. In doing so, the CET



considers policies that have been developed and implemented, training in support of those policies, and measures to ensure the SPD is consistently following and holding its personnel to the requirements of the Settlement Agreement. The review processes will include both quantitative and qualitative assessments.

## Introduction

This report provides the results of the CET's second semi-annual review. It focuses primarily on use-of-force policy development and training, and the drafting of manuals for the Board of Police Commissioners and the Internal Investigations Unit (IIU). It also highlights the value and importance of robust community engagement with diverse organizations and a wide range of individuals.

Certainly, there was substantive progress during this reporting period. In particular, the parties worked hard to address concerns identified in the CET's last report related to the Board of Police Commissioners. Ironically, none of the requirements related to the Board of Police Commissioners were due during Q4 2022, but it became apparent that processes related to selection of Commissioners and Board operations needed immediate attention. For that reason, Settlement Agreement requirements related to the Board of Police Commissioners were prioritized during this reporting period. A more comprehensive update appears below.

Substantial progress has also been made relative to use of force policies and training. Newly developed policies took effect in February and training has commenced. The CET will now begin assessing individual use of force cases to determine compliance with the new requirements. The CET will continue to monitor and make recommendations to enhance use of force training. This subject is also covered in greater detail below.

Transparency and authentic engagement are essential to police legitimacy and effectiveness in any community. The CET has been pleased to see positive developments in relationships that are described below and looks forward to reviewing plans that will formalize the SPD's community engagement strategy as required in the Settlement Agreement.

Two factors have affected the timelines originally agreed by the parties. In addition to expediting and prioritizing requirements related to the Board of Police Commissioners, collective bargaining between the City and the supervisors' union is still ongoing. As outlined in the table later in this document, several timelines have been delayed pending resolution of that contract. Nonetheless, the parties have drafted policies and are committed to expediting implementation once a contract is in place.

The CET did appreciate the opportunity to meet recently with new leadership from the union representing rank and file officers. Their contract was approved by the City and went into effect earlier this year. The CET has also had many opportunities to engage with officers and non-sworn staff during site visits and appreciates the input and feedback they have provided to date.

The remainder of this report focuses in greater detail on issues described above and includes a table indicating the status of specific requirements of the Settlement Agreement that were addressed or due to be addressed during this reporting period.

## Board of Police Commissioners

A draft of the Board of Police Commissioners Manual has been published for public review. A community meeting was recently hosted by the City during which representatives of the City Solicitor's Office provided a comprehensive overview of the draft. Questions were addressed during the meeting and the thirty-day public comment period ends on August 31<sup>st</sup>. Public comments will be considered, and appropriate amendments will be made to the draft. The CET expects to approve the manual in early September.

Training for Board members is now being designed. During this reporting period, the City Solicitor's Office hired an additional attorney who has focused primarily on compliance issues and, more specifically, the Board of Police Commissioners. He will continue to organize training and guide the Board to enhance their operation and ensure proper governance.

Concerns have also been raised in the past by Board members and the community about lack of resources allocated to the board. It should be noted that Board members receive no salary compensation. They serve voluntarily. However, they have made very reasonable requests for phones, laptops, office supplies, etc. The City has assured the CET that these and other resources will be provided as needed. The CET recently attended a meeting with a city official responsible for budget and procurement who indicated that their team would be readily available to assist the Board in developing a line-item budget detailing their needs.

Also, during this reporting period, one member of the Board was reappointed after her term expired. The appointment was made by the Mayor following advertisement of the vacancy and, according to the City Solicitor, consideration of all applicants. The same process was applied when another member who was serving as board chair announced his resignation. The position was advertised, applications were considered, and a new board member was appointed.

A consistent concern has been expressed by community members about the location of Board of Police Commissioner meetings. Currently, the meetings are held at an SPD training facility that includes the firing range. Some community members have expressed angst that gunfire has been heard in the background while they have been at the facility. Furthermore, they feel it would be less intimidating to attend meetings at a more "neutral" site. The City has explained that the facility was selected due to ease of parking and ready access to secure technology for audio/visual purposes. The CET understands both perspectives but has encouraged the City to consider other options that would provide the same conveniences while also addressing some of the community's concerns. The City recently indicated that other options are being explored.

## Use of Force Policies, Training and Review

In our last report, the CET noted its approval of five new policies related to use of force. They are:

1. Use of Force
2. Use of Force - Reporting
3. Use of Force – Investigation and Review
4. Foot Pursuit Policy

## 5. Vehicle Pursuit Policy

Following approval of these policies, the City developed and commenced training to inform officers of policy changes and to test their understanding of new requirements. Prior to implementation of the policies, the Superintendent prepared a video message that was disseminated internally and shared with the community. The video outlined the changes and demonstrated SPD's commitment to the policy improvements. Roll call training and other briefings were then offered to all sworn personnel to familiarize them with the new policies. The five new policies went into effect on February 1, 2023.

Highlights of these new policies, as described in the CET's last report, include a requirement for officers to use de-escalation tactics prior to force whenever possible and to intervene if observing fellow officers using inappropriate force. New policies also provide more guidance and limitations for officers contemplating or engaging in foot pursuits and vehicle pursuits. There are now more stringent requirements in terms of reporting and investigation of force.

The parties were eager to implement the new policies and the CET agreed to the February 1<sup>st</sup> implementation date. However, the CET noted in meetings with the SPD training staff the value of live scenario training to broaden officers' understanding and test their knowledge of the new policies. The training staff readily agreed and developed scenarios that were incorporated into the annual in-service training this summer. The CET observed the training for both supervisors and officers. During these observations, several officers noted their enthusiasm for the live scenarios. It is the CET's opinion that this form of training aligns with adult learning principles and hopes it will become routine in the SPD in-service curriculum. It gives instructors and officers valuable opportunities to bridge policy and practice.

The CET has now commenced the review of SPD use of force cases from April 1, 2023 forward to determine if officers are complying with new policies. We have created a survey tool that will allow us to capture both quantitative and qualitative data for our analyses. There have been challenges accessing data due to SPD's antiquated technology systems, but the CET and DOJ continue to work with the City to develop a more efficient means to access the data.

## Internal Investigations Unit (IIU)

The CET has reviewed drafts of policy and a manual for IIU. It will soon be disseminated for public comment. The parties did contemplate publishing it at the same time as the Board of Police Commissioners manual, but eventually concluded that it could be confusing and counterproductive to present too much material simultaneously. The parties and the CET agreed to prioritize release of the Board manual for public comment, which will end on August 31<sup>st</sup>. Shortly thereafter, the draft IIU policy and manual will be disseminated for public comment.

During the next few months, the CET will also conduct an IIU audit. The audit will cover complaints investigated by IIU from May 2022 to April 2023 and will serve as a "baseline" assessment of SPD's accountability processes. To that end, the CET has created an audit tool for the review of complaints, both those investigated by IIU and those categorized as less serious and handled by line supervisors.

In developing the framework for the IIU audit, the CET has encountered technology challenges like those that surfaced when attempting to review use of force cases. The CET is working with SPD and DOJ to

develop a system that will allow timely and efficient access to complaints and investigations, including review of body-worn camera files.

## Stakeholder Engagement

The CET and the parties continue to benefit from robust engagement with individual community members and organizations. The CET participates regularly in community forums, both in-person and on-line. We also communicate routinely with individual community members, organization leaders, and City officials who have provided valuable input and feedback.

CET members appreciate the commitment of those who participate regularly in C3 community meetings. It has also been heartening to see stronger lines of communication develop recently between representatives of the Springfield Police Department and some community groups that have been skeptical about engaging with SPD in recent years. We are not suggesting these relationships are ideal at this time, but it is our hope that strong lines of communication and transparency will lead to greater trust, police legitimacy, and more productive community partnerships. A year ago, the CET and DOJ routinely took the lead in organizing community meetings related to the Settlement Agreement. More recently, the Springfield Police Department and City Solicitor's Office have assumed that role. With the assistance of community stakeholders, the SPD is currently working to update and formalize its community engagement and communications strategy.

In addition to attending regularly scheduled community meetings, the CET has spent considerable time engaging with members of the SPD. Certainly, they are important stakeholders in this process. We have met with sworn and non-sworn personnel of all ranks, both formally and informally. Their input and feedback have been incredibly helpful in the development and implementation of new policies and training. It has also been helpful to accompany them to community meetings and experience their engagement firsthand.

As an independent representative of the court, the CET does not get involved in labor negotiations, but it will be important to maintain lines of communication with labor leaders throughout this process as they can provide additional opportunities to connect with and hear from their members.

Finally, the relationship between the parties continues to be professional and collaborative. Work on the Board of Police Commissioners' manual and the IIU policy and manual are good examples of that relationship. The parties have iterated on drafts constantly in recent months, harnessing resources with a collective determination to produce quality results.

The CET sincerely thanks all stakeholders for their invaluable contributions. We will continue to attend meetings and engage in regular dialogue with the parties and community representatives. The CET encourages SPD personnel and community members to contact the CET at our website, [www.spdcompliancesteam.com](http://www.spdcompliancesteam.com), with comments, information, and concerns.

## Milestones to Date

The table below is an abbreviated version of the full document in Appendix A. The document in the appendix was developed by the parties and the CET to provide a clear roadmap of implementation requirements and timelines for year one of the Agreement. For clarity, below we have included the Q4 2022 deadlines as well as the Q1 and Q2 2023 categories. Those shaded in green have been fulfilled. Those that have progressed and are likely to be met in calendar year 2023 or are currently delayed due to collective bargaining are indicated in yellow. The deadlines that have not been met and require attention are shaded in red.

Table 1 - Q4 2022 and Q1 2023 Milestones & Status

SA Para	Area/Sub	Milestone	RS	Deliverable	Due/Status
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – General Policy	CET	Preliminary Approval or Disapproval of Use of Force – General Policy	Q4 '22
175, 176	<b>Force Policy</b>	SPD will post the Use of Force – General policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Force Policies for Public Comment	Q4 '22
175, 176	<b>Force Policy</b>	SPD will consider whether any further revisions to the Use of Force - General policy are appropriate in light of public feedback received and revise the policy accordingly.	SPD	Consideration of Public Comments Regarding Force Policies	Q4 '22
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Foot Pursuit Policy.	CET	Preliminary Approval or Disapproval of Use of Force – Foot Pursuits Policy.	Q4 '22
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Vehicle Pursuits Policy.	CET	Preliminary Approval or Disapproval of Use of Force – Vehicle Pursuits Policy.	Q4 '22
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Investigation and Review Policy.	CET	Preliminary Approval or Disapproval of Use of Force - Investigation and Review Policy.	Q4 '22

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19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Reporting Policy.	CET	Preliminary Approval or Disapproval of Use of Force – Reporting Policy.	Q4 '22
175, 176	<b>Force Policy</b>	SPD will post the Use of Force – Foot Pursuit, Vehicle Pursuits, Investigation and Review, and Reporting policies on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Force Policies for Public Comment	Q4 '22
175, 176	<b>Force Policy</b>	SPD will consider whether any further revisions to the force policies are appropriate in light of public feedback received and revise its policies accordingly.	SPD	Consideration of Public Comments Regarding Force Policies  Note: Completed Q1 '23	Q4 '22
#	<b>Force Policy</b>	The Compliance Evaluator will provide final approval of the use of force policies.	CET	Final Approval or Disapproval of Force Policies  Note: Completed Q1 '23	Q4 '22
170	<b>Body Worn Cameras Protocol</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Body Worn Camera protocol.	CET	Preliminary Approval or Disapproval of Body Worn Camera Protocol  Note: Delayed Collective Bargaining	Q4 '22
175, 176	<b>Body Worn Cameras Protocol</b>	SPD will post the Body Worn Camera protocol on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Body Worn Camera Protocol for Public Comment  Note: Delayed Collective Bargaining	Q4 '22
175, 176	<b>Body Worn Cameras Protocol</b>	SPD will consider whether any further revisions to the Body Worn Camera protocol are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding Body Worn Camera Protocol  Note: Delayed Collective Bargaining	Q4 '22
#	<b>Body Worn Cameras Protocol</b>	The Compliance Evaluator will provide final approval of the Body Worn Camera protocol.	CET	Final Approval or Disapproval of Body Worn Camera Protocol  Note: Delayed Collective Bargaining	Q4 '22
136	<b>Force Analysis</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the Use of Force (UOF) Data Collection and Analysis protocol.	CET	Final Approval or Disapproval of the UOF Data Analysis Protocol	Q4 '22
141	<b>Training (Field) Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Field Training and Evaluation Program (FTEP) policy.	CET	Preliminary Approval or Disapproval of FTEP Policy  Note: Delayed Collective Bargaining	Q4 '22

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175, 176	<b>Training (Field) Policy</b>	SPD will post the FTEP policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of FTEP Policy for Public Comment  Note: Delayed Collective Bargaining	Q4 '22
175, 176	<b>Training (Field) Policy</b>	SPD will consider whether any further revisions to the FTEP policy are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding FTEP Policy  Note: Delayed Collective Bargaining	Q4 '22
#	<b>Training (Field) Policy</b>	The Compliance Evaluator will provide final approval of the FTEP policy.	CET	Final Approval or Disapproval of FTEP Policy  Note: Delayed Collective Bargaining	Q4 '22
86	<b>Accountability (IIU)</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve SPD's Internal Investigations (IIU) policies.	CET	Preliminary Approval or Disapproval of IIU Policies  Note: To occur Q3 2023	Q4 '22
175, 176	<b>Accountability (IIU)</b>	SPD will post the IIU policies on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of IIU Policies for Public Comment  Note: To occur Q3 '23	Q4 '22
175, 176	<b>Accountability (IIU)</b>	SPD will consider whether any further revisions to the IIU policies are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding IIU Policies  Note: To occur Q3 '23	Q4 '22
#	<b>Accountability (IIU)</b>	The Compliance Evaluator will provide final approval of the IIU policies.	CET	Final Approval or Disapproval of IIU Policies  Note: To occur Q3 '23	Q4 '22
86	<b>Accountability (IIU)</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the IIU policies.	CET	Final Approval or Disapproval of IIU Policies Curricula  Note: To occur Q3 '23	Q4 '22
86	<b>Accountability (IIU)</b>	Using the approved training curricula, SPD will deliver training on the IIU policies.	SPD	Delivery of IIU Policies	Q4 '22
19	<b>Force Training Approval</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the force policies.	CE	Final Approval or Disapproval of Force Training Curricula	Q1 '23
19	<b>Force Training Delivery</b>	Using the approved training curricula, SPD will deliver use of force training to relevant personnel.	SPD	Delivery of Use of Force Training	Q1 '23
196	<b>Force Assessment</b>	The Compliance Evaluator will provide SPD and DOJ with a report detailing its method for conducting the Force Assessment.	CE	Delivery of Compliance Evaluator Report regarding Force Assessment Method	Q1 '23
170	<b>Body Worn Cameras Protocol Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the	CE	Final Approval or Disapproval of Body Worn Camera Curricula	Q1 '23

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		training curricula for the Body Worn Camera protocol.		Note: Delayed Collective Bargaining	
170	<b>Body Worn Cameras Protocol Training</b>	Using the approved training curricula, SPD will deliver training on the Body Worn Camera protocol to relevant personnel.	SPD	Delivery of Body Worn Camera Training  Note: Delayed Collective Bargaining	Q1 '23
141, 142	<b>Field Training Approval</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the FTEP policy.	CE	Final Approval or Disapproval of FTEP Training Curricula  Note: Delayed Collective Bargaining	Q1 '23
142	<b>Field Training Delivery</b>	Using the approved training curricula, SPD will deliver training on the FTEP policy to relevant personnel.	SPD	Delivery of FTEP Training  Note: Delayed Collective Bargaining	Q1 '23
116	<b>Accountability BPC</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the process for serving on the Board of Police Commissioners (BPC) and the posting of BPC terms and open vacancies on the City's website.	CE	Final Approval or Disapproval of BPC Application Process	Q1 '23
207	<b>Public Engagement</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's community engagement plan.	CE	Final Approval or Disapproval of SPD Community Engagement Plan	Q1 '23
209	<b>Public Engagement</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's community outreach and public information program.	CE	Final Approval or Disapproval of SPD Community Outreach and Public Information Program	Q1 '23
129	<b>Accountability Disciplinary Matrix</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Disciplinary Matrix.	CE	Preliminary Approval or Disapproval of Disciplinary Matrix  Note: Delayed Collective Bargaining	TBD
175, 176	<b>Accountability Disciplinary Matrix</b>	SPD will post the Disciplinary Matrix on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Disciplinary Matrix for Public Comment  Note: Delayed Collective Bargaining	TBD
175, 176	<b>Accountability Disciplinary Matrix</b>	SPD will consider whether any further revisions to the Disciplinary Matrix are appropriate considering public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding Disciplinary Matrix  Note: Delayed Collective Bargaining	TBD
#	<b>Accountability Disciplinary Matrix</b>	The Compliance Evaluator will provide final approval of the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix  Note: Delayed Collective Bargaining	TBD



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129	<b>Accountability Disciplinary Matrix</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix Curricula  Note: Delayed Collective Bargaining	TBD
129	<b>Accountability Disciplinary Matrix</b>	Using the approved training curricula, SPD will deliver training on the Disciplinary Matrix to relevant personnel.	SPD	Delivery of Disciplinary Matrix Training  Note: Delayed Collective Bargaining	TBD
118	<b>Accountability BPC</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of the BPC Manual.	CE	Final Approval or Disapproval of BPC Manual  Note: To occur Q3 2023	Q1 '23
87	<b>Accountability IIU</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve SPD's Internal Investigations (IIU) Manual.	CE	Preliminary Approval or Disapproval of IIU Manual  Note: To occur Q3 2023	Q1 '23
175, 176	<b>Accountability IIU</b>	SPD will post the IIU Manual on its website for a two-week public comment period and provide opportunities for the public to comment on the manual.	SPD	Posting of IIU Manual for Public Comment  Note: To occur Q3 2023	Q1 '23
175, 176	<b>Accountability IIU</b>	SPD will consider whether any further revisions to the IIU Manual are appropriate considering public feedback received and revise its manual accordingly.	SPD	Consideration of Public Comments Regarding IIU Manual  Note: To Occur Q3 2023	Q1 '23
#	<b>Accountability IIU</b>	The Compliance Evaluator will provide final approval of the IIU Manual.	CE	Final Approval or Disapproval of IIU Manual  Note: To Occur Q3 2023	Q1 '23
119	<b>Accountability BPC</b>	Upon receiving the agreed-upon drafts from the City and DOJ, the Compliance Evaluator will review and preliminarily approve the training curricula for BPC.	CE	Preliminary Approval or Disapproval of BPC Training	Q1 '23
175, 176	<b>Accountability BPC</b>	The City will post the BPC training on its website for a two-week public comment period and provide opportunities for the public to comment on the training.	City	Posting of BPC Training for Public Comment	Q1 '23
69	<b>Force Committee</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Use of Force Committee (UFC) policy.	CE	Preliminary Approval or Disapproval of UFC Policy	Q1 '23
175, 176	<b>Force Committee</b>	SPD will post the UFC policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of UFC Policy for Public Comment	Q1 '23
175, 176	<b>Force Committee</b>	SPD will consider whether any further revisions to the UFC policy are appropriate considering public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding UFC Policy	Q1 '23
#	<b>Force Committee</b>	The Compliance Evaluator will provide final approval of the UFC policy.	CE	Final Approval or Disapproval of UFC Policy	Q1 '23

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64	<b>Force FIT Manual</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Force Investigations Team (FIT) Manual.	CE	Preliminary Approval or Disapproval of FIT Manual	Q1 '23
175, 176	<b>Force FIT Manual</b>	SPD will post the FIT Manual on its website for a two-week public comment period and provide opportunities for the public to comment on the manual.	SPD	Posting of FIT Manual for Public Comment	Q1 '23
175, 176	<b>Force FIT Manual</b>	SPD will consider whether any further revisions to the FIT Manual are appropriate considering public feedback received and revise the manual accordingly.	SPD	Consideration of Public Comments Regarding FIT Manual	Q1 '23
#	<b>Force FIT Manual</b>	The Compliance Evaluator will provide final approval of the FIT Manual.	CE	Final Approval or Disapproval of the FIT Manual	Q1 '23
122	<b>Accountability BPC</b>	SPD will post a quarterly summary of BPC meetings and hearings on the City's website.	SPD	Posting of BPC quarterly summary	Q1 '23
175, 176	<b>Accountability BPC</b>	The City will consider whether any further revisions to the BPC training are appropriate considering public feedback received and revise its training accordingly.	City	Consideration of Public Comments Regarding BPC Training	Q2 '23
#	<b>Accountability BPC</b>	The Compliance Evaluator will provide final approval of the BPC training.	CE	Final Approval or Disapproval of BPC Training	Q2 '23
119	<b>Accountability BPC</b>	Using the approved training curricula, the City will deliver BPC training to relevant personnel.	City	Delivery of BPC Training	Q2 '23
71	<b>Force Committee</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the UFC policy.	CE	Final Approval or Disapproval of UFC Training Curricula	Q2 '23
71	<b>Force Committee</b>	Using the approved training curricula, SPD will deliver training on the UFC policy to relevant personnel.	SPD	Delivery of UFC Training	Q2 '23
64	<b>Force FIT Manual</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the FIT Manual.	CE	Final Approval or Disapproval of FIT Manual	Q2 '23
64	<b>Force FIT Manual</b>	Using the approved training curricula, SPD will deliver training on the FIT Manual to relevant personnel.	SPD	Delivery of FIT Manual Training	Q2 '23
148	<b>Training Electronic Tracking System</b>	Upon receiving notice that SPD and DOJ have collaborated on the system and agree, the Compliance Evaluator will provide final approval of SPD's electronic tracking system for training.	CE	Final Approval or Disapproval of Electronic Tracking System	Q2 '23
167	<b>Supervision Promotions and Assignments</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's promotions and assignments policies.	CE	Preliminary Approval or Disapproval of Promotions and Assignments Policies	Q2 '23
175, 176	<b>Supervision Promotions and Assignments</b>	SPD will post the promotions and assignments policies on its website for a two-week public comment period and provide	SPD	Posting of Promotions and Assignments Policies for Public Comment	Q2 '23

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		opportunities for the public to comment on the policies.			
175, 176	<b>Supervision Promotions and Assignments</b>	SPD will consider whether any further revisions to the promotions and assignments policies are appropriate considering public feedback received and revise its policies accordingly.	SPD	Consideration of Public Comments Regarding Promotions and Assignments Policies	Q2 '23
#	<b>Supervision Promotions and Assignments</b>	The Compliance Evaluator will provide final approval of the promotions and assignments policies.	CE	Final Approval or Disapproval of Promotions and Assignments Policies	Q2 '23
167	<b>Supervision Promotions and Assignments</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the promotions and assignment policies.	CE	Final Approval or Disapproval of Promotions and Assignments Curricula	Q2 '23
169	<b>Supervision Officer Assistance</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's officer wellness program.	CE	Final Approval or Disapproval of Officer Wellness Program	Q2 '23
169	<b>Supervision Officer Assistance</b>	SPD will implement the approved officer wellness program.	SPD	Implementation of Approved Officer Wellness Program	Q2 '23
152	<b>Supervisor General Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the general supervisor training curricula.	CE	Final Approval or Disapproval of General Supervisor Training Curricula	Q2 '23
152	<b>Supervisor General Training</b>	Using the approved training curricula, SPD will deliver training on the general supervisor training to relevant personnel.	SPD	Delivery of General Supervisor Training	Q2 '23
124	<b>Accountability Annual Report – Complaints and Discipline</b>	SPD will publish an annual report that summarizes, at minimum, complaint trends, disposition of complaints, the Board of Police Commissioners' discipline decisions, and its public outreach functions.	SPD	Final Approval or Disapproval of Annual Report	Q2 '23

## Challenges

The challenges in this reporting period mirrored those in the CET's first report: 1) Board of Police Commissioners; 2) Implementation Capacity; 3) Collective Bargaining; and 4) Community Engagement. We are pleased to report progress in three of these categories.

As indicated earlier in this report, the parties and the CET have focused much effort on requirements related to the Board of Police Commissioners. The manual will be issued shortly. Training is being developed. The board now has the benefit of a dedicated attorney from the City Solicitor's Office. The City has committed to providing the budget necessary to support their operation. In the next two quarters, the CET will review individual cases and closely monitor Board developments to ensure they are operating effectively and according to guidelines in the new manual.

To date, it has been challenging for the parties to meet agreed timelines. As indicated in the table above and that in the Appendix, several deadlines have been missed. The CET attributes this primarily to the underestimation of work required to address Board of Police Commissioners issues, particularly the drafting of the new manual. While delays are concerning, it is most important to get things right, particularly policy development and drafting of important manuals. In terms of capacity, the CET was pleased during this reporting period to see the City and the SPD dedicate more personnel to this project. Additional sworn and non-sworn SPD members have been assigned to focus on compliance and the City Solicitor hired another lawyer. DOJ has also assigned another attorney to their team. As indicated above, the CET has also expanded its team by adding Mike Teeter to focus on use of force reviews. Considering the resources added during this reporting period, the CET is optimistic that many of the deadlines missed to date will be resolved this calendar year.

Ongoing collective bargain with the supervisors' union continues to impact delays. While it is impossible to predict the outcome, the parties have been preparing draft materials in advance and have expressed commitment to accelerate relevant requirements once a contract is in place.

As noted in the Community Engagement section above, the SPD has expanded its reach and is engaging more frequently with some groups that were previously disaffected. Some of these relationships remain fragile, but it is encouraging nonetheless to see progress. The CET will continue its regularly attendance at community events and looks forward to reviewing the SPD's draft community engagement and communications strategy during Q3 2023.

## Conclusion

While delays are concerning, there is a legitimate explanation for nearly every delay in the attached tables. Because the City and DOJ have added valuable resources to the project during this reporting period, momentum now is positive. The CET is confident that many of the delays noted in this update will be resolved during the 3<sup>rd</sup> and 4<sup>th</sup> quarters of 2023.

Apart from the supervisors' collective bargaining process, progress has been made on all the challenges identified in the CET's last report. Several issues related to the Board of Police Commissioners have been addressed. Others will be resolved during Q3 and Q4 2023. One of the union contracts was successfully negotiated during this reporting period. Of greatest encouragement, there are early signs of improving relationships with a broader range of community groups.

Going forward, lines 70-76 of **Appendix A** reflect the deliverables originally agreed for 3<sup>rd</sup> Quarter and 4<sup>th</sup> Quarter 2023. Many of them relate to promotions, supervision, and supervisory training. Some of these requirements will also hinge on collective bargaining. The priority for the next reporting period will be addressing delayed requirements, in particular those not impacted by the supervisors' ongoing contract negotiations. Once delays in other categories have been addressed, the parties and CET will then focus on Q3 and Q4 requirements.

As stated previously, the CET considers it a privilege to engage with the parties and members of the Springfield community on this very important project. Sincere thanks to all who have demonstrated interest and commitment to this work.

**First Year Compliance Evaluator Plan**[Compliance Evaluator Report | August 2023](#)General Notes:

SPD will draft, create, or revise its policies, procedures, programs, or trainings consistent with the goals and relevant paragraphs of the Settlement Agreement. SPD, the City, and DOJ (“the Parties”) will collaborate on the drafting, creation, or revision of the policies, programs, or trainings; reach agreement on them; and provide the agreed-upon draft policy, program, or training to the Compliance Evaluator for her approval.

*For policies and procedures only:* The Compliance Evaluator will preliminarily approve the Parties’ agreed-upon draft policy or procedure. Upon the Compliance Evaluator’s preliminary approval, SPD and the City will post the policy or procedure for a two-week public comment period. After the public comment period has concluded, SPD will consider whether any revisions to the policy or procedure are necessary in light of public feedback, and revise its policies as needed. The Compliance Evaluator will then provide final approval of the policy or procedure.

Every six months, the Compliance Evaluator will conduct reviews to determine whether the City and SPD have complied with the requirements of the Settlement Agreement. Compliance requires that the City and SPD: (a) have incorporated the requirement into policy; (b) have trained all relevant personnel as necessary to fulfill their responsibilities pursuant to the requirement; and (c) are consistently following and holding SPD personnel to the requirements and standards enunciated herein. Compliance reviews will contain the elements necessary for reliability and comprehensiveness. Compliance reviews may be conducted using sampling and compilation data where appropriate. Before beginning a compliance assessment, the Compliance Evaluator will submit a report to the Parties proposing the method for conducting such an assessment.

Although SPD, the City, and DOJ will make best efforts to meet the deadlines provided in the Settlement Agreement, the Parties recognize that it may not be feasible in all circumstances. This compliance plan adjusts some of the deadlines in the Settlement Agreement. Additionally, for all quarterly deadlines established below, the Compliance Evaluator and Parties agree that the deadlines might, in some instances, need to be extended by a brief interval to allow or accommodate unforeseen circumstances or unexpected, minor delays. Accordingly, if and only if the Compliance Evaluator and the Parties agree that an extension for any of the quarterly deadlines outlined below is warranted and acceptable, the deadline may be extended by an interval of thirty (30) calendar days without receiving formal approval of the Court for an extension of the deadline. No quarterly deadline may be extended by more than thirty (30) calendar days without approval of the Court. The extension of any specific quarterly deadline, or deadlines, will not change or otherwise affect any other deadline.

Unless the Compliance Evaluator identifies problems with a deadline extension or otherwise raises issues with the Court, none of the Parties, the Court, or the public should interpret changes in Settlement Agreement deadlines or quarterly deadlines to reflect problems in implementation or a lack of progress. Instead,

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	all should understand that, for progress to be comprehensive and enduring, it may be necessary to take more time initially to refine policies, procedures, or training so that progress, ultimately, is faster, more effective, and more efficient.						
	Decree Para.	Area	Sub-Area	Milestone	Responsible Stakeholder(s)	Deliverable	Deadline
1	19-61	Force	Policy	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the following SPD use of force policies: 1) use of force – general; 2) use of force – foot pursuit; 3) use of force – vehicle pursuits; 4) use of force – investigation and review; and 5) use of force - reporting.	CE	Preliminary Approval or Disapproval of Force Policies	4 <sup>th</sup> Quarter 2022
2	175, 176	Force	Policy	SPD will post the use of force policies on its website for a two-week public comment period, and provide opportunities for the public to comment on the policies.	SPD	Posting of Force Policies for Public Comment	4 <sup>th</sup> Quarter 2022
3	175, 176	Force	Policy	SPD will consider whether any further revisions to the force policies are appropriate in light of public feedback received, and revise its policies accordingly.	SPD	Consideration of Public Comments Regarding Force Policies	4 <sup>th</sup> Quarter 2022
4	#	Force	Policy	The Compliance Evaluator will provide final approval of the use of force policies.	CE	Final Approval or Disapproval of Force Policies	4 <sup>th</sup> Quarter 2022
5	170	Body Worn Cameras	Body Worn Camera Protocol	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Body Worn Camera protocol.	CE	Preliminary Approval or Disapproval of Body Worn Camera Protocol	4 <sup>th</sup> Quarter 2022
6	175, 176	Body Worn Cameras	Body Worn Camera Protocol	SPD will post the Body Worn Camera protocol on its website for a two-week public comment period, and provide opportunities for the public to comment on the policies.	SPD	Posting of Body Worn Camera Protocol for Public Comment	4 <sup>th</sup> Quarter 2022

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7	175, 176	<b>Body Worn Cameras</b>	<b>Body Worn Camera Protocol</b>	SPD will consider whether any further revisions to the Body Worn Camera protocol are appropriate in light of public feedback received, and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding Body Worn Camera Protocol	4 <sup>th</sup> Quarter 2022
8	#	<b>Body Worn Cameras</b>	<b>Body Worn Camera Protocol</b>	The Compliance Evaluator will provide final approval of the Body Worn Camera protocol.	CE	Final Approval or Disapproval of Body Worn Camera Protocol	4 <sup>th</sup> Quarter 2022
9	136	<b>Force</b>	<b>UOF Data Analysis Protocol</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the Use of Force (UOF) Data Collection and Analysis protocol.	CE	Final Approval or Disapproval of the UOF Data Analysis Protocol	4 <sup>th</sup> Quarter 2022
10	141	<b>Training (Field)</b>	<b>Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Field Training and Evaluation Program (FTEP) policy.	CE	Preliminary Approval or Disapproval of FTEP Policy	4 <sup>th</sup> Quarter 2022
11	175, 176	<b>Training (Field)</b>	<b>Policy</b>	SPD will post the FTEP policy on its website for a two-week public comment period, and provide opportunities for the public to comment on the policies.	SPD	Posting of FTEP Policy for Public Comment	4 <sup>th</sup> Quarter 2022
12	175, 176	<b>Training (Field)</b>	<b>Policy</b>	SPD will consider whether any further revisions to the FTEP policy are appropriate in light of public feedback received, and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding FTEP Policy	4 <sup>th</sup> Quarter 2022
13	#	<b>Training (Field)</b>	<b>Policy</b>	The Compliance Evaluator will provide final approval of the FTEP policy.	CE	Final Approval or Disapproval of FTEP Policy	4 <sup>th</sup> Quarter 2022
14	86	<b>Accountability</b>	<b>Internal Investigations Unit</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve SPD's Internal Investigations (IIU) policies.	CE	Preliminary Approval or Disapproval of IIU Policies	4 <sup>th</sup> Quarter 2022

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15	175, 176	<b>Accountability</b>	<b>Internal Investigations Unit</b>	SPD will post the IIU policies on its website for a two-week public comment period, and provide opportunities for the public to comment on the policies.	SPD	Posting of IIU Policies for Public Comment	4 <sup>th</sup> Quarter 2022
16	175, 176	<b>Accountability</b>	<b>Internal Investigations Unit</b>	SPD will consider whether any further revisions to the IIU policies are appropriate in light of public feedback received, and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding IIU Policies	4 <sup>th</sup> Quarter 2022
17	#	<b>Accountability</b>	<b>Internal Investigations Unit</b>	The Compliance Evaluator will provide final approval of the IIU policies.	CE	Final Approval or Disapproval of IIU Policies	4 <sup>th</sup> Quarter 2022
18	86	<b>Accountability</b>	<b>Internal Investigations Unit</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the IIU policies.	CE	Final Approval or Disapproval of IIU Policies Curricula	4 <sup>th</sup> Quarter 2022
19	86	<b>Accountability</b>	<b>Internal Investigations Unit</b>	Using the approved training curricula, SPD will deliver training on the IIU policies.	SPD	Delivery of IIU Policies	4 <sup>th</sup> Quarter 2022
20	19	<b>Force</b>	<b>Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the force policies.	CE	Final Approval or Disapproval of Force Training Curricula	1 <sup>st</sup> Quarter 2023
21	19	<b>Force</b>	<b>Training</b>	Using the approved training curricula, SPD will deliver use of force training to relevant personnel.	SPD	Delivery of Use of Force Training	1 <sup>st</sup> Quarter 2023
22	196	<b>Force</b>	<b>Compliance Evaluator Assessment</b>	The Compliance Evaluator will provide SPD and DOJ with a report detailing its method for conducting the Force Assessment.	CE	Delivery of Compliance Evaluator Report regarding Force Assessment Method	1 <sup>st</sup> Quarter 2023



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23	170	<b>Body Worn Cameras</b>	<b>Body Worn Camera Protocol</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the Body Worn Camera protocol.	CE	Final Approval or Disapproval of Body Worn Camera Curricula	1 <sup>st</sup> Quarter 2023
24	170	<b>Body Worn Cameras</b>	<b>Body Worn Camera Protocol</b>	Using the approved training curricula, SPD will deliver training on the Body Worn Camera protocol to relevant personnel.	SPD	Delivery of Body Worn Camera Training	1 <sup>st</sup> Quarter 2023
25	141, 142	<b>Training (Field)</b>	<b>Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the FTEP policy.	CE	Final Approval or Disapproval of FTEP Training Curricula	1 <sup>st</sup> Quarter 2023
26	142	<b>Training (Field)</b>	<b>Training</b>	Using the approved training curricula, SPD will deliver training on the FTEP policy to relevant personnel.	SPD	Delivery of FTEP Training	1 <sup>st</sup> Quarter 2023
27	116	<b>Accountability</b>	<b>Board of Police Commissioners</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the process for serving on the Board of Police Commissioners (BPC) and the posting of BPC terms and open vacancies on the City's website.	CE	Final Approval or Disapproval of BPC Application Process and Posting of BPC Terms and Open Vacancies	1 <sup>st</sup> Quarter 2023
28	207	<b>Public Engagement</b>	<b>Community Engagement Plan</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's community engagement plan.	CE	Final Approval or Disapproval of SPD Community Engagement Plan	1 <sup>st</sup> Quarter 2023
29	209	<b>Public Engagement</b>	<b>Community Outreach and Public Information Program</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's community outreach and public information program.	CE	Final Approval or Disapproval of SPD Community Outreach and Public Information Program	1 <sup>st</sup> Quarter 2023

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30	129	<b>Accountability</b>	<b>Disciplinary Matrix</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Disciplinary Matrix.	CE	Preliminary Approval or Disapproval of Disciplinary Matrix	
31	175, 176	<b>Accountability</b>	<b>Disciplinary Matrix</b>	SPD will post the Disciplinary Matrix on its website for a two-week public comment period, and provide opportunities for the public to comment on the policies.	SPD	Posting of Disciplinary Matrix for Public Comment	
32	175, 176	<b>Accountability</b>	<b>Disciplinary Matrix</b>	SPD will consider whether any further revisions to the Disciplinary Matrix are appropriate in light of public feedback received, and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding Disciplinary Matrix	
33	#	<b>Accountability</b>	<b>Disciplinary Matrix</b>	The Compliance Evaluator will provide final approval of the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix	
34	129	<b>Accountability</b>	<b>Disciplinary Matrix</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix Curricula	
35	129	<b>Accountability</b>	<b>Disciplinary Matrix</b>	Using the approved training curricula, SPD will deliver training on the Disciplinary Matrix to relevant personnel.	SPD	Delivery of Disciplinary Matrix Training	
36	118	<b>Accountability</b>	<b>Board of Police Commissioners Manual</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of the BPC Manual.	CE	Final Approval or Disapproval of BPC Manual	1 <sup>st</sup> Quarter 2023
37	87	<b>Accountability</b>	<b>Internal Investigations Unit Manual</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve SPD's Internal Investigations (IIU) Manual.	CE	Preliminary Approval or Disapproval of IIU Manual	1 <sup>st</sup> Quarter 2023

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38	175, 176	<b>Accountability</b>	<b>Internal Investigations Unit Manual</b>	SPD will post the IIU Manual on its website for a two-week public comment period, and provide opportunities for the public to comment on the manual.	SPD	Posting of IIU Manual for Public Comment	1 <sup>st</sup> Quarter 2023
39	175, 176	<b>Accountability</b>	<b>Internal Investigations Unit Manual</b>	SPD will consider whether any further revisions to the IIU Manual are appropriate in light of public feedback received, and revise its manual accordingly.	SPD	Consideration of Public Comments Regarding IIU Manual	1 <sup>st</sup> Quarter 2023
40	#	<b>Accountability</b>	<b>Internal Investigations Unit Manual</b>	The Compliance Evaluator will provide final approval of the IIU Manual.	CE	Final Approval or Disapproval of IIU Manual	1 <sup>st</sup> Quarter 2023
41	119	<b>Accountability</b>	<b>Board of Police Commissioners</b>	Upon receiving the agreed-upon drafts from the City and DOJ, the Compliance Evaluator will review and preliminarily approve the training curricula for BPC.	CE	Preliminary Approval or Disapproval of BPC Training	1 <sup>st</sup> Quarter 2023
42	175, 176	<b>Accountability</b>	<b>Board of Police Commissioners</b>	The City will post the BPC training on its website for a two-week public comment period, and provide opportunities for the public to comment on the training.	City	Posting of BPC Training for Public Comment	1 <sup>st</sup> Quarter 2023
43	69	<b>Force</b>	<b>Use of Force Committee</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Use of Force Committee (UFC) policy.	CE	Preliminary Approval or Disapproval of UFC Policy	1 <sup>st</sup> Quarter 2023
44	175, 176	<b>Force</b>	<b>Use of Force Committee</b>	SPD will post the UFC policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of UFC Policy for Public Comment	1 <sup>st</sup> Quarter 2023
45	175, 176	<b>Force</b>	<b>Use of Force Committee</b>	SPD will consider whether any further revisions to the UFC policy are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding UFC Policy	1 <sup>st</sup> Quarter 2023
46	#	<b>Force</b>	<b>Use of Force Committee</b>	The Compliance Evaluator will provide final approval of the UFC policy.	CE	Final Approval or Disapproval of UFC Policy	1 <sup>st</sup> Quarter 2023

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47	64	<b>Force</b>	<b>FIT Manual</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Force Investigations Team (FIT) Manual.	CE	Preliminary Approval or Disapproval of FIT Manual	1 <sup>st</sup> Quarter 2023
48	175, 176	<b>Force</b>	<b>FIT Manual</b>	SPD will post the FIT Manual on its website for a two-week public comment period and provide opportunities for the public to comment on the manual.	SPD	Posting of FIT Manual for Public Comment	1 <sup>st</sup> Quarter 2023
49	175, 176	<b>Force</b>	<b>FIT Manual</b>	SPD will consider whether any further revisions to the FIT Manual are appropriate in light of public feedback received and revise the manual accordingly.	SPD	Consideration of Public Comments Regarding FIT Manual	1 <sup>st</sup> Quarter 2023
50	#	<b>Force</b>	<b>FIT Manual</b>	The Compliance Evaluator will provide final approval of the FIT Manual.	CE	Final Approval or Disapproval of the FIT Manual	1 <sup>st</sup> Quarter 2023
51	122	<b>Accountability</b>	<b>Summary of BPC Meetings</b>	SPD will post a quarterly summary of BPC meetings and hearings on the City's website.	SPD	Posting of BPC quarterly summary	1 <sup>st</sup> Quarter 2023
52	175, 176	<b>Accountability</b>	<b>Board of Police Commissioners</b>	The City will consider whether any further revisions to the BPC training are appropriate in light of public feedback received and revise its training accordingly.	City	Consideration of Public Comments Regarding BPC Training	2 <sup>nd</sup> Quarter 2023
53	#	<b>Accountability</b>	<b>Board of Police Commissioners</b>	The Compliance Evaluator will provide final approval of the BPC training.	CE	Final Approval or Disapproval of BPC Training	2 <sup>nd</sup> Quarter 2023
54	119	<b>Accountability</b>	<b>Board of Police Commissioners</b>	Using the approved training curricula, the City will deliver BPC training to relevant personnel.	City	Delivery of BPC Training	2 <sup>nd</sup> Quarter 2023
55	71	<b>Force</b>	<b>Use of Force Committee</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the UFC policy.	CE	Final Approval or Disapproval of UFC Training Curricula	2 <sup>nd</sup> Quarter 2023

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56	71	<b>Force</b>	<b>Use of Force Committee</b>	Using the approved training curricula, SPD will deliver training on the UFC policy to relevant personnel.	SPD	Delivery of UFC Training	2 <sup>nd</sup> Quarter 2023
57	64	<b>Force</b>	<b>FIT Manual</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the FIT Manual.	CE	Final Approval or Disapproval of FIT Manual	2 <sup>nd</sup> Quarter 2023
58	64	<b>Force</b>	<b>FIT Manual</b>	Using the approved training curricula, SPD will deliver training on the FIT Manual to relevant personnel.	SPD	Delivery of FIT Manual Training	2 <sup>nd</sup> Quarter 2023
59	148	<b>Training</b>	<b>Electronic Tracking System</b>	Upon receiving notice that SPD and DOJ have collaborated on the system and agree, the Compliance Evaluator will provide final approval of SPD's electronic tracking system for training.	CE	Final Approval or Disapproval of Electronic Tracking System	2 <sup>nd</sup> Quarter 2023
60	167	<b>Supervision</b>	<b>Promotions and Assignments</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's promotions and assignments policies.	CE	Preliminary Approval or Disapproval of Promotions and Assignments Policies	2 <sup>nd</sup> Quarter 2023
61	175, 176	<b>Supervision</b>	<b>Promotions and Assignments</b>	SPD will post the promotions and assignments policies on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Promotions and Assignments Policies for Public Comment	2 <sup>nd</sup> Quarter 2023
62	175, 176	<b>Supervision</b>	<b>Promotions and Assignments</b>	SPD will consider whether any further revisions to the promotions and assignments policies are appropriate in light of public feedback received and revise its policies accordingly.	SPD	Consideration of Public Comments Regarding Promotions and Assignments Policies	2 <sup>nd</sup> Quarter 2023
63	#	<b>Supervision</b>	<b>Promotions and Assignment</b>	The Compliance Evaluator will provide final approval of the promotions and assignments policies.	CE	Final Approval or Disapproval of Promotions and	2 <sup>nd</sup> Quarter 2023

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						Assignments Policies	
64	167	<b>Supervision</b>	<b>Promotions and Assignments</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the promotions and assignment policies.	CE	Final Approval or Disapproval of Promotions and Assignments Curricula	2 <sup>nd</sup> Quarter 2023
65	169	<b>Supervision</b>	<b>Officer Assistance and Support</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's officer wellness program.	CE	Final Approval or Disapproval of Officer Wellness Program	2 <sup>nd</sup> Quarter 2023
66	169	<b>Supervision</b>	<b>Officer Assistance and Support</b>	SPD will implement the approved officer wellness program.	SPD	Implementation of Approved Officer Wellness Program	2 <sup>nd</sup> Quarter 2023
67	152	<b>Supervision</b>	<b>General Supervisor Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the general supervisor training curricula.	CE	Final Approval or Disapproval of General Supervisor Training Curricula	2 <sup>nd</sup> Quarter 2023
68	152	<b>Supervision</b>	<b>General Supervisor Training</b>	Using the approved training curricula, SPD will deliver training on the general supervisor training to relevant personnel.	SPD	Delivery of General Supervisor Training	2 <sup>nd</sup> Quarter 2023
69	124	<b>Accountability</b>	<b>Annual Report re Complaints and Discipline</b>	SPD will publish an annual report that summarizes, at minimum, complaint trends, disposition of complaints, the Board of Police Commissioners' discipline decisions, and its public outreach functions.	SPD	Final Approval or Disapproval of Annual Report	2 <sup>nd</sup> Quarter 2023
70	140	<b>Training</b>	<b>Training Plan</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the written training plan.	CE	Final Approval or Disapproval of Training Plan	3 <sup>rd</sup> Quarter 2023
71	167	<b>Supervision</b>	<b>Promotions and Assignments</b>	Using the approved training curricula, SPD will deliver training on the promotions and assignment policies to relevant personnel.	SPD	Delivery of Promotions and	3 <sup>rd</sup> Quarter 2023

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						Assignments Training	
72	155, 160	<b>Supervision</b>	<b>Early Intervention System</b>	SPD will develop Early Intervention System (EIS), EIS protocol, and individualized interventions.	SPD	Final Approval or Disapproval of Early Intervention System	4 <sup>th</sup> Quarter 2023
73	164	<b>Supervision</b>	<b>Early Intervention System Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the EIS training curricula.	CE	Final Approval or Disapproval of EIS Curricula	4 <sup>th</sup> Quarter 2023
74	164	<b>Supervision</b>	<b>Early Intervention System Training</b>	Using the approved training curricula, SPD will deliver EIS training to relevant personnel.	SPD	Delivery of EIS Training	4 <sup>th</sup> Quarter 2023
75	212	<b>Public Engagement</b>	<b>Survey</b>	The City and SPD will design and conduct a survey of the Springfield community's experience with and perceptions of SPD in general, the Firearms Investigation Unit, in particular, and public safety	City	Conduct Survey	4 <sup>th</sup> Quarter 2023
76	212	<b>Public Engagement</b>	<b>Annual Report re Community Engagement Efforts</b>	SPD will post a publicly available report of its community engagement efforts, including a breakdown by district.	City	Posting of Community Engagement Report	4 <sup>th</sup> Quarter 2023