



COMPLIANCE EVALUATOR REPORT

February 2024

O'Toole Associates, LLC
www.spdcompliance.com

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Letter from the Lead Compliance Evaluator

The Compliance Evaluator Team (“CET”) is pleased to share its third bi-annual report that focuses primarily on developments during the last two quarters of Calendar Year 2023 related to the [Settlement Agreement](#) between the United States Department of Justice (“DOJ”) and the City of Springfield, MA (“City”) filed on April 13, 2022. The report also includes commentary on current developments and provides an outline of anticipated work during the first half of 2024.

We are pleased to report progress on two items of particular interest to the community – the Board of Police Commissioners’ (“BPC”) Manual and the Internal Investigations Unit (“IIU”) Manual. Also, two additional policies related to peer support and field training have recently been drafted and distributed for public comment. Specific in-service training modules have been designed to educate officers and supervisors about new requirements and expectations.

This report will also provide a synopsis of reviews of Use of Force cases and Internal Investigations Unit cases conducted by the CET and DOJ during this reporting period. The CET and the parties agreed it was important to conduct initial reviews of individual cases during this period to establish a baseline for future assessment of compliance. As expected, during these first reviews, the CET and the DOJ identified issues that require further attention. Critical feedback has been and will continue to be provided to the Springfield Police Department (“SPD”) when appropriate to inform corrective action, training, and discipline.

Community engagement is essential in our work. Once again, the CET expresses appreciation to community members and organizations that have taken interest in and made valuable contributions to this process. We’ve observed many dedicated members of the SPD make authentic efforts to improve community relationships. It has been heartening to attend community meetings and witness this firsthand. We’re particularly pleased about the collaborative effort underway between the SPD and community leaders to develop a data dashboard that will enhance transparency and readily provide important information to community members.

It is important to acknowledge that this is a rigorous process. Nonetheless, the CET encourages the parties to increase momentum to meet deadlines, but certainly at a pace that ensures reforms are implemented properly and lead to desired outcomes and sustainability. Both parties have dedicated substantial resources to the effort. We understand SPD is again expanding the Settlement Agreement Implementation Unit to promote greater accountability and effective training. We genuinely appreciate the commitment and work ethic of all who are progressing this effort

Thank you for your interest in this update. Please [contact our team](#) if you have any questions or comments.

Sincerely,



Kathleen O’Toole
Lead Compliance Evaluator

The Settlement Agreement

This is the third bi-annual report produced by the CET. For the benefit of those who have not read previous reports, the following is a synopsis of the process that led to the Settlement Agreement and establishment of the CET as outlined in previous reports:

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.

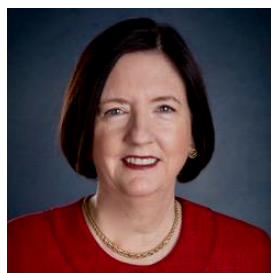
As required in Paragraph 194 of the Agreement, prior to the appointment of the CET, DOJ and the City agreed on a detailed outline of key benchmarks for implementation of the Agreement.

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 include both quantitative and qualitative assessments.

Compliance Evaluator Team

Members of the CET have valued opportunities to meet and work with representatives of the City, SPD, DOJ, and the community. The following biographies are provided for those who are not yet acquainted with the team.



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 a number of federal, 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, 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.

Overview

This CET is pleased to report significant progress in areas that have been of particular concern to the parties and the community – The Board of Police Commissioners (“BPC”) and the Internal Investigations Unit (“IIU”). Following arduous processes that commenced more than a year ago, the BPC Manual has finally been published and the IIU Manual has been posted for public comment through March 2024. BPC training has also been developed and is underway.

New policies related to Field Training and Peer Support have been drafted by the parties, reviewed by the CET, and were recently published for public comment.

Another round of annual in-service training has commenced with particular focus on use of force policy, force investigation, and effective supervision.

The CET observed positive community engagement when attending numerous in-person and remote meetings. The SPD and community leaders are also working on an exciting project to create a public-facing SPD data dashboard that will enhance transparency.

These are all encouraging developments and we appreciate the dedication of those who have worked very hard to progress these reforms. However, as anticipated at this stage of the process, some challenges remain. The CET recently completed reviews of select Use of Force and Internal Investigations Unit cases to develop a benchmark for comparison when conducting compliance assessments going forward. DOJ received copies of most, if not all, of the selected cases so they could conduct an independent assessment of the cases and the CET’s findings. The IIU review identified weaknesses in some of the investigator interviews. We also discovered that IIU does not routinely identify in their reports relevant policies that may be implicated in their investigations of complaints and misconduct. Our UOF review revealed cases in which officers did not follow guidelines in the new use of force policies, and supervisors did not clearly understand their responsibilities when conducting use of force reviews and investigations. The CET has shared the results of these reviews with the City and the SPD in hopes such feedback will prompt more thorough investigations, more effective supervision, design of future training modules, and discipline when appropriate. We reiterate that these were assessments to establish a baseline only, not to assess compliance with the Settlement Agreement. We certainly expect to see improvements going forward during our compliance reviews as new manuals and policies are reinforced with quality training for officers and supervisors.

These developments, as well as a table indicating the status of specific Settlement Agreement requirements during this and previous reporting periods, are covered in greater detail below.

Board of Police Commissioners

As indicated in previous reports, the CET encouraged the parties to prioritize work on requirements related to the Board of Police Commissioners as its work is an integral component of the SPD’s accountability structure and is of particular interest to the community.

The CET is pleased to report that the BPC Manual has finally been published. Development of the manual was a more arduous task than the parties and CET originally anticipated. It was appropriately drafted by

attorneys representing the City Solicitor's Office and DOJ. The process was understandably delayed at times by collective bargaining developments, conflicting language in labor agreements, and the important need to conduct robust internal and external engagement processes. Valuable feedback elicited from all stakeholders, including BPC members and community members, was incorporated into the final document approved by the CET. As noted previously, the BPC was established in advance of the Settlement Agreement and has been operating to date with limited direction. The manual provides important guidelines for BPC operations. During this reporting period, the City Solicitor's Office has also been providing significant resources and more structured guidance to the Board.

Training for BPC members is now underway. It includes instruction provided by the City Solicitor's Office and external presenters. In fact, members attended a Use of Force training program offered by the Massachusetts Municipal Police Training Committee ("MPTC") in February 2024. Representatives of the City Solicitor's Office observed the training to be certain it aligned with applicable law and SPD policy. The City has also applied on behalf of the BPC for membership in the National Association for Civilian Oversight of Law Enforcement ("NACOLE"), a highly credible organization that provides robust peer to peer engagement and other professional development opportunities to members.

BPC members, who serve voluntarily without salary compensation, have raised concerns in the past about lack of equipment and other resources. The CET has been informed by Board members that many of their requests for equipment and supplies have now been satisfied. The CET appreciates the response of city procurement officials who have assisted the Board in developing a line-item budget to address their needs. The City has also assured the CET that it will continue to support the BPC by providing necessary resources to conduct their work.

The CET previously noted concerns expressed by community members about the location of BPC meetings. In response, the issue has been addressed in the BPC manual. The result addresses the legitimate concerns expressed by community members and the City. Regular monthly meetings will be held at various facilities throughout the city that are accessible and have available parking. The annual meeting in March will be held at the Raymond A. Jordan Senior Center. Disciplinary hearings must take place in an environment with secure technology for audio/visual purposes. They will continue to be held at the Page Blvd. location.

Internal Investigations Unit (IIU) Policy and Manual

IIU is responsible for classification and investigation of complaints and reports of misconduct by SPD personnel. This includes complaints of alleged misconduct from community members and also reports of misconduct submitted by SPD supervisory personnel.

Pursuant to requirements in the Settlement Agreement, the parties and the CET continued to iterate on the draft of an IIU Manual during this reporting period. This was also a strenuous process that required legal expertise representing both parties and consideration of evolving collective bargaining agreements. It was also necessary to align the IIU Manual with the BPC Manual.

The draft document includes sections that address the following:

- Complaint Intake Process
- Complaint Classification Protocol

- Scope and Manner of IIU Investigations
- Time Requirements for IIU Investigations
- Notification to Officers
- Interview Recording
- Investigation of Criminal Conduct by Department Members
- Notification Process for Complaints

The CET is pleased to report that the draft IIU Manual and IIU Policy have now been posted for public comment. The comment period will be open until March 31, 2024 allowing for robust community engagement, input, and feedback. In addition to the opportunity for community members to enter feedback when clicking on the link, SPD will also distribute paper copies when requested and provide overviews of the documents at more than a dozen C3 community meetings by the end of March. In addition, helpful community leaders are organizing another remote community meeting that will take place on March 20, 2024. They have agreed to prioritize this item on their agenda which will allow an opportunity for additional community members to participate and comment.

Because the CET has been involved at each stage of the drafting process, it will only review edits of the manual and policy that are made in response to community feedback. Therefore, the CET anticipates that the IIU Manual and related policy will be published and effective in April 2024.

Review of Force Cases

As noted in previous CET reports, the following five policies related to Use of Force went into effect on February 1, 2023:

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

Highlights of these new policies have also been delineated in previous reports, but it is worthwhile to reiterate them. There is now a requirement for officers to attempt de-escalation whenever possible prior to using force. There is also a requirement for fellow officers to intervene if observing another officer using inappropriate force. Stricter guidelines are now in place for officers contemplating or engaging in vehicle and foot pursuits. There are now detailed guidelines and requirements related to force investigation and review.

At the time these policies were launched, the CET noted that robust training would be required to inform officers and test their knowledge of the policies. Roll call, video, and classroom training was provided to all sworn department members prior to and immediately following implementation. Also, based on encouragement by the CET, training staff agreed to develop and incorporate live scenarios into the in-service program. Scenario training aligns with adult learning principles and provides officers and instructors valuable opportunities to bridge policy with decision making and performance in the field. The CET has observed training modules during the past year and has engaged with officers of all ranks and

instructors who have consistently expressed enthusiasm for the hybrid model of classroom and live scenario training. The CET has also provided constructive feedback to those developing the training.

The CET created a survey tool and commenced review of SPD use of force cases to determine if officers are complying with the new policies. The team captured both quantitative and qualitative data during the reviews. As previously noted, we have sometimes experienced challenges accessing data due to SPD's antiquated technology systems, but SPD personnel have been very responsive to our requests and have made significant efforts to gather and share those data that are available.

The CET and the parties have agreed that this initial audit will provide a valuable baseline for our ongoing assessment of compliance with the Settlement Agreement. It was important to manage expectations during this first round of assessment. As anticipated, when reviewing documents and video recordings, we observed some excellent police work, but also discovered some policy violations and tactical concerns. We noted weaknesses in reporting and supervision as well.

The audit included review of most Level 3 and above force cases from April 1, 2023 through September 30, 2023, as well as a sampling of Level 2 cases. Level 2 force includes lower level force such as that which would cause temporary pain or discomfort but not injury, the pointing of a firearm or Taser, or the cycling of a Taser as a warning. Level 3 force is an intermediate level which is likely to cause an injury but does not rise to a higher level. Level 4 includes more serious uses of force such as a Taser, strikes or kicks, and less lethal munitions. Level 5 includes the most serious force such as deadly force, more than two Taser cycles and strikes to particularly vulnerable parts of the body. The following is a summary of observations during this initial review:

- Thirty-five incidents involving force were reviewed (8 level 4, 16 level 3, and 11 level 2) and issues related to compliance were identified in the majority of these cases.
- The majority of the cases (twenty-eight) involved objectively reasonable uses of force.
- Six cases involved unreasonable force and in one case the incident investigation was insufficient to allow a reasonableness finding. None of these cases were identified as unreasonable during SPD's review process prior to the CET's audit.
- The audit of SPD's uses of force, investigations, and force reviews indicated that at least 13 paragraphs of the Settlement Agreement related to use of force were not being followed on a regular basis.
- The audit revealed a lack of clarity on the part of line officers regarding several portions of the revised use of force policy. We identified instances in which use of force was resorted to quickly without adequate attempts to de-escalate (SA ¶ 20), de-escalation efforts were not adequately documented (SA ¶ 35), use of force or threatened use of force was used against subjects in handcuffs, in some instances simply to gain compliance with orders (SA ¶¶ 21, 23), force was used that was not reported (SA ¶ 33), and some instances where the updated pursuit policies were not followed. We also noted the use by line officers of disrespectful or threatening language prior to or after effectuating an arrest.
- The audit also revealed that supervisors do not have a clear understanding of what is expected of them when conducting force investigations, analyzing force incidents, and completing their reviews. For example, we rarely saw any documentation of supervisory response to the scene of use of force incidents (SA ¶¶ 42, 43, 56); no interviews, admonishments, or photographs taken (SA¶ 57); and no meaningful review to identify unlawful conduct, policy violations, and tactical needs (SA ¶¶ 45-47, 58). Furthermore, supervisors failed to document what information they reviewed in order to reach their conclusions when engaging in oversight of officer use of force.

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- Specific concerns warranting follow up by SPD were identified in three cases, and details regarding these incidents were brought to the attention of SPD leadership.

The SPD has consistently noted that force is used very infrequently when measured against the number of calls officers respond to. According to SPD data, officers responded to 245,855 calls for service in 2023. Force was used in 296 of these cases. 239 of these cases involved Level 2 force. 42 were Level 3 cases, and 10 were Level 4. There were 5 Level 5 cases but no discharges of firearms by SPD officers in 2023.

While it is important for the community to have this context, it is also important for officers to understand that one improper use of force can be devastating for them personally, the SPD, and the community. It is imperative, particularly for supervisors, to consider potential consequences when reviewing each use of force. Effective supervision, counselling, remedial action, and discipline when appropriate will enhance performance and reduce the likelihood of more serious consequences.

Members of the CET met with SPD personnel involved in the implementation of the Settlement Agreement and training to discuss a plan to address most identified issues. The following plan was developed:

- SPD was to develop a training curriculum to be delivered to SPD supervisors. This training was to include detailed guidance for conducting use of force investigations, analyzing force, and taking corrective actions and/or accountability measures when policy, tactical, or training issues are identified.
- SPD was to deliver a separate training curriculum to all sworn personnel to cover search and seizure law, use of force policy, force reporting, pursuit policies, and complaint handling. Additionally, it was agreed that training would be developed addressing conducted energy weapons policy and tactics, body-worn camera requirements, and elements of procedural justice.
- SPD was to investigate and consider implementation of templates for force reporting and review to provide additional guidance regarding documentation, investigation and review of force incidents.
- SPD hoped to have these curricula approved by the CET and to begin delivery during the 4th quarter of 2023.

The CET and SPD exchanged several drafts of training curricula in late 2023 and early 2024. It was clear the training staff was struggling to balance this challenge with other demands related to state mandates, accreditation requirements, and recruit training. The SPD team responsible for compliance stepped in to assist with the supervisors' curricula and instruction, but the training discussed above for all sworn personnel has not yet been started. Unfortunately, due to delays, the supervisors' training commenced before formal signoff by DOJ and the CET. Program edits continued during the early weeks of the training in response to CET feedback. While not ideal, the City explained it would have been disruptive in terms of field deployment schedules to postpone the supervisors' training. The parties and CET have agreed it will be important going forward for the SPD to produce proposed curricula well in advance to allow DOJ and CET necessary time to conduct proper reviews, provide constructive feedback, and sign off on the final products.

The supervisors' training is well underway and is expected to be completed in the 1st quarter of 2024. This training addresses many of the issues identified by the CET. Importantly, the supervisors attending this training are engaging in robust critical discussions regarding use of force incidents as they identify policy and tactical issues and other coaching opportunities within the training environment. Additionally, these

supervisors and commanders are being provided training and templates to improve the quality of their investigation, review, and documentation of use of force incidents.

Review of Internal Investigations Unit (IIU Cases)

Although the IIU policy and manual are not yet formalized, the CET felt it was important during this reporting period to conduct a baseline audit of IIU cases in response to concerns raised by internal and external sources about complaints and disciplinary processes. This review covered nineteen cases, including Preliminary Investigations of Employees (“P.I.E.’s”) and Special Orders (“S.O.’s”).

The following definitions of PIE’s and SO’s have been agreed by the parties and appear in the current draft of the IIU manual:

- **Preliminary Investigations of an Employee (P.I.E.’s)** Complaints that are investigated by a supervisor in the designated officer’s chain of command with their squad or unit and tracked by IIU. (An example of a complaint that would be properly classified as a P.I.E. would be a citizen’s complaint that alleges rudeness or minor violations of SPD Rules and Regulations, such as minor rudeness, traffic and parking violations, or profanity not directed at an individual.)
- **Special Orders (S.O.’s)** Complaints that should be investigated by IIU. All misconduct complaints involving any allegation related to a use of force will be classified as S.O. (Examples of complaints that would be properly classified as an S.O. include allegations of serious misconduct, such as the use of excessive force, corrupt acts, or an alleged violation of a community member’s constitutional rights. The IIU will investigate any custodial death of a prisoner, officer involved shooting, or departmental vehicle pursuit that results in death or serious bodily injury. The above are provided as examples only and further categories of complaints may also be ordered to be investigated by the IIU per order of the Police Superintendent.

Again, because this was the first round of reviews, the purpose of this audit was not to assess compliance, but to establish a baseline for future comparison. The following is a synopsis of issues identified and feedback provided to the City and SPD during this reporting period:

- When conducting interviews of complainants, witnesses, and involved officers, many investigations lacked follow-up questions directly related to allegations or complaints.
- It appears SPD only obtains statements from involved officers and other persons and does not seek out additional witnesses.
- In some cases, additional questions were not asked to clarify discrepancies associated with allegations.
- There was no evidence that follow-up interviews were recorded or transcribed.
- In reports, investigators often paraphrase interviewees’ responses. It would be better to additionally record these interviews where possible and include the recording in the file.
- Interviews with complainants are only summarized in the investigation which can lead to bias and a lack of thoroughness. It would be better, at a minimum, to also record these interviews when possible and include the recording in the file. A transcript would be ideal.
- Investigators do not clearly cite specific policy sections implicated during investigations and evidence related to each.

- Written documentation notifying complainants of the final disposition should be included within the investigation.

The parties and the CET will work to address these concerns in a timely manner as the new IIU Manual becomes effective. IIU investigators will require training that aligns with the new manual. Also, generally speaking, IIU investigators should receive ongoing training to update them on best practices in internal investigations. The CET and DOJ will assist the City in its attempt to identify quality educational opportunities.

Policy and Administrative Updates

In previous reports, the CET has noted delays in implementation of certain policies due to collective bargaining. Now that the supervisors' contract has been resolved, two additional policies were drafted and posted for public comment in February 2024. They are 1) Field Training and Evaluation Program ("FTEP") and 2) Peer Support. Once public comments have been considered and appropriate edits have been made, the CET will grant final approval and these policies will immediately take effect.

A disciplinary matrix has been developed and will also be implemented now that collective bargaining has been resolved. Training will be provided to supervisors, commanders, and the Board of Police Commissioners prior to implementation.

As required in the Settlement Agreement, electronic systems are now in place to track all police training. The ACADIS system monitors officers' completion of all state mandated training. The SPD is also utilizing Power DMS to memorialize additional curricula and closely monitor attendance.

Stakeholder Engagement

Authentic engagement with community groups and individual community members is integral to the CET's work. Members of the team participate and observe routinely at in-person and online events. They also communicate regularly with individual community leaders and members. The input and feedback we have received has been mostly constructive and very valuable.

In our last report we underscored the value of weekly C3 community meetings, but also acknowledged promising relationships emerging with some community groups that have been reluctant to engage with SPD in recent years. The CET team is pleased to see these relationships improving. In fact, there is a collaborative team effort between SPD and community leaders to develop a data dashboard. This user friendly, public portal will enhance transparency and allow community access to important SPD data. The CET appreciates the leap of faith certain SPD members and community leaders have taken to overcome tensions that have existed. It is our hope that these important relationships continue to flourish.

In addition to engaging regularly with Springfield community members, the CET has spent considerable time interacting with members of the SPD. We meet and communicate with SPD representatives of all ranks very regularly. We purposely avoided any activity that could be perceived as interference during labor negotiations, but now that both sworn unions have contracts in place, we welcome the opportunity to communicate with union leaders more regularly.

The CET would be remiss if it didn’t acknowledge the contributions made by non-sworn members of the SPD as well. We have engaged with many and have been impressed by their abilities, contributions, and dedication.

We also felt it was important to steer clear of politics during the recent election year, but look forward to maintaining strong lines of communication with City leadership. Mayor Sarno and members of his team met with the Lead Compliance Evaluator in December 2023 and reiterated support for this process and a commitment to achieve the goals set out in the Settlement Agreement. This project will only succeed with the ongoing support of the Mayor and City Council.

The relationship between the parties and the CET continues to be collaborative and productive. Naturally, there have been occasions when we disagree, but to date we’ve been able to resolve differences through straightforward, respectfully dialogue. In the end, we all have the same goals – to provide SPD personnel with the policies, training, equipment and resources they need to succeed, and to deliver a modern, professional police service to the Springfield community.

Once again, the CET sincerely thanks all stakeholders for their commitment, input and feedback. Working with you, the CET hopes to increase momentum during this next reporting period. We encourage SPD personnel and community members to contact us at our website, www.spdcomplianceteam.com, with comments, information, or concerns you may have.

Milestones to Date

The table below provides a roadmap of implementation requirements to date with the current status of each. The requirements below shaded in green have been fulfilled. Those that have progressed and are likely to be met during the next reporting period are indicated in yellow.

SA Para	Area/Sub	Milestone	RS	Deliverable	Status
19-61	Force Policy	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	
175, 176	Force Policy	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	
175, 176	Force Policy	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	

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19-61	Force Policy	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.	
19-61	Force Policy	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.	
19-61	Force Policy	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.	
19-61	Force Policy	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.	
175, 176	Force Policy	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	
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	
	Force Policy	The Compliance Evaluator will provide final approval of the use of force policies.	CET	Final Approval or Disapproval of Force Policies	
170	Body Worn Cameras 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.	CET	Preliminary Approval or Disapproval of Body Worn Camera Protocol	
175, 176	Body Worn Cameras 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	
175, 176	Body Worn Cameras Protocol	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	
	Body Worn Cameras Protocol	The Compliance Evaluator will provide final approval of the Body Worn Camera protocol.	CET	Final Approval or Disapproval of Body Worn Camera Protocol	

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136	Force Analysis	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	
141	Training (Field) Policy	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	
175, 176	Training (Field) Policy	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	
175, 176	Training (Field) Policy	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	
	Training (Field) Policy	The Compliance Evaluator will provide final approval of the FTEP policy.	CET	Final Approval or Disapproval of FTEP Policy	
86	Accountability (IIU)	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	
175, 176	Accountability (IIU)	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 Extended review period through 3/31/2024	
175, 176	Accountability (IIU)	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	
	Accountability (IIU)	The Compliance Evaluator will provide final approval of the IIU policies.	CET	Final Approval or Disapproval of IIU Policies	
86	Accountability (IIU)	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	
86	Accountability (IIU)	Using the approved training curricula, SPD will deliver training on the IIU policies.	SPD	Delivery of IIU Policies	
19	Force Training Approval	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	

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19	Force Training Delivery	Using the approved training curricula, SPD will deliver use of force training to relevant personnel.	SPD	Delivery of Use of Force Training	
196	Force Assessment	The Compliance Evaluator will provide SPD and DOJ with a report detailing its method for conducting the Force Assessment.	CE	Survey tool agreed with DOJ.	
170	Body Worn Cameras Protocol Training	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	
170	Body Worn Cameras Protocol Training	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	
141, 142	Field Training Approval	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	
142	Field Training Delivery	Using the approved training curricula, SPD will deliver training on the FTEP policy to relevant personnel.	SPD	Delivery of FTEP Training	
116	Accountability BPC	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	
207	Public Engagement	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	
209	Public Engagement	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	
129	Accountability Disciplinary Matrix	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	
175, 176	Accountability Disciplinary Matrix	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	
175, 176	Accountability Disciplinary Matrix	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	

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	Accountability Disciplinary Matrix	The Compliance Evaluator will provide final approval of the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix	
129	Accountability Disciplinary Matrix	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	
129	Accountability Disciplinary Matrix	Using the approved training curricula, SPD will deliver training on the Disciplinary Matrix to relevant personnel.	SPD	Delivery of Disciplinary Matrix Training	
118	Accountability BPC	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	
87	Accountability IIU	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	
175, 176	Accountability IIU	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	
175, 176	Accountability IIU	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	
	Accountability IIU	The Compliance Evaluator will provide final approval of the IIU Manual.	CE	Final Approval or Disapproval of IIU Manual	
119	Accountability BPC	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	
175, 176	Accountability BPC	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	
69	Force Committee	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	
175, 176	Force Committee	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	
175, 176	Force Committee	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	
	Force Committee	The Compliance Evaluator will provide final approval of the UFC policy.	CE	Final Approval or Disapproval of UFC Policy	

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64	Force FIT Manual	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	
175, 176	Force FIT Manual	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	
175, 176	Force FIT Manual	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	
	Force FIT Manual	The Compliance Evaluator will provide final approval of the FIT Manual.	CE	Final Approval or Disapproval of the FIT Manual	
122	Accountability BPC	SPD will post a quarterly summary of BPC meetings and hearings on the City's website.	SPD	Posting of BPC quarterly summary	
175, 176	Accountability BPC	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	
	Accountability BPC	The Compliance Evaluator will provide final approval of the BPC training.	CE	Final Approval or Disapproval of BPC Training	
119	Accountability BPC	Using the approved training curricula, the City will deliver BPC training to relevant personnel.	City	Delivery of BPC Training	
71	Force Committee	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	
71	Force Committee	Using the approved training curricula, SPD will deliver training on the UFC policy to relevant personnel.	SPD	Delivery of UFC Training	
64	Force FIT Manual	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	
64	Force FIT Manual	Using the approved training curricula, SPD will deliver training on the FIT Manual to relevant personnel.	SPD	Delivery of FIT Manual Training	
148	Training Electronic Tracking System	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	
167	Supervision Promotions and Assignments	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	
175, 176	Supervision Promotions and Assignments	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	

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		opportunities for the public to comment on the policies.			
175, 176	Supervision Promotions and Assignments	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	
	Supervision Promotions and Assignments	The Compliance Evaluator will provide final approval of the promotions and assignments policies.	CE	Final Approval or Disapproval of Promotions and Assignments Policies	
167	Supervision Promotions and Assignments	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	
169	Supervision Officer Assistance	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	
169	Supervision Officer Assistance	SPD will implement the approved officer wellness program.	SPD	Implementation of Approved Officer Wellness Program	
152	Supervisor General Training	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	
152	Supervisor General Training	Using the approved training curricula, SPD will deliver training on the general supervisor training to relevant personnel.	SPD	Delivery of General Supervisor Training	
124	Accountability Annual Report – Complaints and Discipline	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	
196	UOF and IIU audit		CE	To be completed every six months.	
122	BPC Quarterly Summaries	Quarterly summaries posted to City website.	City		
123	BPC Annual Meetings	Public meeting to provide overview of BPC work.	City	Scheduled for 3/13/2024	
209	SPD - hosted Quarterly Meeting	SPD collaborates with community organizations on these meetings.	SPD	Scheduled for 3/20/2024	

Challenges

In its first two reports, the CET identified the following challenges: 1) Board of Police Commissioners' Manual and Training; 2) City and SPD Implementation Capacity; 3) Collective Bargaining; and 4) Community Engagement. We are pleased we have been able to report progress in all of these categories.

Board of Police Commissioners' Manual and Training. 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 has been approved and training has commenced. The Board also has the benefit of a dedicated attorney from the City Solicitor's Office. The City has committed to providing the budget necessary to support BPC's 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.

City and SPD Implementation Capacity. DOJ and the City have assigned additional personnel to the compliance effort. Nonetheless, as indicated in our last report and the charts embedded in this report, the parties continue to struggle with deadlines. Now that the BPC manual is complete and the IIU manual is nearing completion, the CET hopes to see continued momentum during the next reporting period.

Collective Bargaining. A contract for the Supervisors' union finally evolved through the arbitration process. This has cleared the way to formalize additional policies that had been drafted, but were pending resolution of collective bargaining.

Community Engagement. The parties are currently working to complete a formal Community Engagement Plan as required in the Settlement Agreement. As noted previously in this report, the CET has definitely witnessed improvements in relationships between SPD and certain community organizations. While it is a work in progress, it is particularly encouraging to see SPD members collaborating closely with community organizers to plan meetings and produce tangible results.

At this juncture, the CET would cite Supervision and Training as the most significant challenges. During preliminary reviews of Use of Force and IIU cases, we have seen some concerning examples of poor supervision. SPD leadership has acknowledged this as a concern. Sergeants and lieutenants play critical roles as first-line and mid-level supervisors. If they perform effectively as mentors, coaches, and disciplinarians, police officers in the field are much more likely to succeed.

In fairness, the CET has met with and observed some exceptional supervisors in SPD. Our goal is to work with the parties on strategy, training, and professional development opportunities that will elevate all supervisors to the level of excellence we have observed in some. SPD leadership must set clear expectations for supervisors and provide the support and resources they need to perform their roles effectively. When supervisors fail to perform appropriately, they too must be held accountable. The CET looks forward to engaging with more first-line and mid-level supervisors as well as their union representatives going forward. Their perspectives will be invaluable when developing solutions to this challenge.

Quality in-service training is essential in policing, particularly when introducing officers to new policies and tactics. CET members have engaged in several meetings and discussions with representatives of the SPD Training staff. We do not question their competence or dedication. We do question their capacity to fulfill their significant obligations. In addition to recruit training, they are responsible for designing and delivering content to meet MA POST, accreditation, and Settlement Agreement requirements.

The CET has encouraged SPD to leverage external resources to the greatest extent possible to supplement internal training capacity. The CET recently organized a meeting with the MA MPTC to explore resources they may have to assist with curriculum development and instruction. The CET has also encouraged the

City to explore partnerships with academic institutions in the region. We will continue to work with the parties to develop opportunities to increase capacity and improve quality of SPD training, education, and professional development.

In summary, the parties have made considerable progress in addressing the challenges outlined in the CET's last report. The focus will now shift to addressing concerns related to Supervision and Training. Progress will be assessed as the CET and DOJ conduct further reviews of Use of Force and IIU cases.