



COMPLIANCE EVALUATOR REPORT

February 2023

O'Toole Associates, LLC
www.spdcompliance.com

Table of Contents

[Letter from the Lead Compliance Evaluator](#)

[Compliance Evaluator Team Biographies](#)

[Introduction](#)

[Stakeholder Engagement](#)

[Milestones to Date](#)

[Potential Challenges](#)

[Looking Forward](#)

[Conclusion](#)

[Appendix](#)

Letter from the Lead Compliance Evaluator

I'm pleased to share my team's inaugural report, which includes our initial assessment following six months of engagement 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 we work collectively towards compliance with requirements delineated in the [Settlement Agreement](#) filed on April 13, 2022.

My team and I would like to express sincere gratitude to the parties for approaching this work with collaborative spirit and a shared commitment to excellence. We would also like to thank members of the Springfield community for welcoming our team and for your eagerness to support our work. Your curiosity, feedback, and partnership have been invaluable to date and are crucial as we proceed. We look forward to your continued input and feedback, both in-person and virtually. We want to be certain that everyone who wants a voice in this process can participate and contribute.

I've previously witnessed police reform from several perspectives. I served as a police chief in two major cities and as a state cabinet official overseeing public safety. In those roles, I was responsible for initiating reforms and driving innovation. I also served as a compliance evaluator in another jurisdiction that successfully implemented a settlement agreement. I've assisted the Department of Justice during investigations, and I've been on monitoring teams in two large jurisdictions. I also chaired and participated in three international commissions dedicated entirely to police reform. I state these experiences for one reason – to share optimism. Without exception, in each of these reform initiatives, the police service, its members, and its community benefitted significantly from the effort. Settlement Agreements, such as the one being implemented now in Springfield, require the development of robust policies that provide clear direction to officers, improve supervision, and guarantee accountability for inappropriate conduct. Enhanced training ensures that officers clearly understand these policies and further develop and test their skills. Wellness programs provide the support that personnel often need to address the inevitable stressors and demands of police work. Outcomes include increased professionalism, enhanced public trust, improvements in police morale, and safer neighborhoods. Our collective goal is to produce such results for the Springfield community.

My team and I will continue to report to Magistrate Judge Katherine Robertson on a regular basis to include quarterly status hearings and semi-annual reports. The hearings are open to the public. The published reports will summarize and assess progress made throughout the preceding six months. They will align with our annual monitoring plans, underscore successes, challenges and opportunities, and outline priorities for the following six months. We hope you find the reports helpful in tracking progress and encourage you to [contact our team](#) if you have any comments, suggestions, or questions.

Thank you for your interest in this important work.

Sincerely,



Kathleen O'Toole
Lead Compliance Evaluator

Compliance Evaluator Team Biographies



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, 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.

Introduction

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 and Natalia Delgado 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.

This report provides the results of the first such review. It focuses primarily on policy development to date and, more specifically, use-of-force policies, as the five policies related to force have been prioritized by the parties and the CET.

The CET is pleased with the progress the parties have made during the first six months of implementation. It is particularly heartening to witness the commitment of those representing the parties and the collaborative nature of the working relationship between DOJ and the City. No doubt, that good will and dedication will produce positive results for the SPD, the city, and the community they serve.

While not intended to eclipse the positive developments during the first review period, there was one significant issue of concern noted by the CET, the parties, and the community during this reporting period – The Board of Police Commissioners. While none of the requirements in the Settlement Agreement related to the Board of Police Commissioners were scheduled to be addressed in this first reporting period, this was an issue raised repeatedly. Questions have been raised about the capacity of the Board of Police Commissioners to fulfil its role as a critical component of the SPD accountability system. It is clear that this recently established body must be appropriately structured, resourced and trained to perform its important function of adjudicating serious disciplinary cases. This issue will be addressed in greater detail later in this report.

Stakeholder Engagement

The CET is committed to a robust process of authentic engagement with the parties (DOJ and the City) and the Springfield community. As noted earlier, the CET was selected three and a half months following the effective date of the Settlement Agreement. It was clear that DOJ and the City had developed a very collaborative, productive working relationship during that initial period. Rather than interrupt that positive cadence, the CET chose to align with it. From experience in several other jurisdictions where settlement agreements are being implemented, CET members feel strongly that highly collaborative processes produce the most positive results. That's not to say that spirited discussion is discouraged – in fact, respectful, spirited dialogue between parties and with community members is highly encouraged. Everyone who desires to have a voice in this process should have a voice, whether their views are expressed in person, in remote meetings, or in writing.

During this first review period, the CET benefitted significantly from robust engagement with parties' representatives and community stakeholders. Weekly update meetings have allowed the CET and the parties to address timely agenda items and maintain continuity in the process. The CET conducted four in-person site visits to Springfield during this first review period. DOJ and USAO representatives were also present for these visits. In each instance, the CET conducted formal and informal meetings with representatives of the parties, community groups and individuals.

Immediately, upon appointment, we were approached by several community groups and individuals looking to establish lines of communication. We hold regular one on one meetings with community members, community organizers, and city officials eager to share their perspectives. We also maintain a CET website, www.spdcompliance.com, with over four hundred visits recorded since its September launch. Community members are welcome to contact us via webform, email, or telephone as detailed on the site.

We have prioritized in-person community meetings whenever possible. In September, we met with community partners affiliated with SPD’s Counter Criminal Continuum (C3) policing initiative. On September 28, 2022, the CET held an advertised community meet and greet at the Raymond A. Jordan Senior Center to introduce ourselves and clarify our role. Other valuable meetings were organized during this review period by the parties or helpful, engaged community organizations. In late October the CET attended a virtual community meeting focusing on the Agreement hosted by U.S. Attorney Rachael Rollins. In November, three community organizations, the Pioneer Valley Project, the Massachusetts Senior Action Council, and the NAACP co-facilitated a virtual town hall featuring all three CET members, who had opportunities to address and engage with the group at large and in smaller breakout rooms. A series of community meetings during the week of December 12th was organized by the SPD. In each of these settings, the CET had the opportunity to interact formally and informally with community members and learned much from each experience.

The CET has maintained constant communication with stakeholders during the process to date and observes all relevant public meetings. In fact, a day seldom passes without phone calls and messages exchanged with the parties and community members. The CET will maintain its commitment to robust engagement throughout implementation of this Agreement as it is essential to maintaining trust and legitimacy in this process and will be a key element of success.

Milestones to Date

The table below is an abbreviated version of the full document in Appendix A. The overall document was developed by the CET and the parties to provide a clear roadmap of implementation requirements and timelines for year one of the Agreement. For purposes of this review, we have separated the Q4 2022 the deadlines below. Those shaded in green have been met in this reporting period. Those that have progressed and are likely to be met in early 2023 are indicated in yellow. Going forward, in similar tables, the deadlines that have not been met and require significant attention will be shaded in red. There are no items that fall into this latter category during this reporting period.

Table 1 - Q4 2022 Milestones & Status

SA Para	Area/Sub	Milestone	RS	Deliverable	Due/ 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	Q4 '22
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	Q4 '22

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	Q4 '22
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.	Q4 '22
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.	Q4 '22
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.	Q4 '22
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.	Q4 '22
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	Q4 '22
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	Q4 '22
#	Force Policy	The Compliance Evaluator will provide final approval of the use of force policies.	CET	Final Approval or Disapproval of Force Policies	Q4 '22
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	Q4 '22
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	Q4 '22
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	Q4 '22

#	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	Q4 '22
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	Q4 '22
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	Q4 '22
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	Q4 '22
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	Q4 '22
#	Training (Field) Policy	The Compliance Evaluator will provide final approval of the FTEP policy.	CET	Final Approval or Disapproval of FTEP Policy	Q4 '22
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	Q4 '22
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	Q4 '22
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	Q4 '22
#	Accountability (IIU)	The Compliance Evaluator will provide final approval of the IIU policies.	CET	Final Approval or Disapproval of IIU Policies	Q4 '22
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	Q4 '22
86	Accountability (IIU)	Using the approved training curricula, SPD will deliver training on the IIU policies.	SPD	Delivery of IIU Policies	Q4 '22

As indicated, most requirements during this first reporting period focus on policy development and implementation. Below is a more detailed update for each requirement originally scheduled for completion by 4th Quarter 2022.

Use of Force

1. Use of Force - General

During 4th Quarter 2022 a draft General Use of Force policy agreed by the parties was presented to the CET. The CET provided feedback that was considered and incorporated into the policy where appropriate. Following tentative approval by the CET, the policy was posted for public comment as required by the Agreement. The SPD collaborated with DOJ and the CET when considering public comments posted on their website and received in other community fora. Further edits to the policy were made when agreed by the parties and the CET. The CET then issued final approval of the policy. Preliminary training to align with the policy has been developed. Following approval of the curriculum by the CET, training commenced during 1st Quarter 2023. Two major highlights in the new policy are: 1) a requirement for officers to use de-escalation tactics prior to force when possible; and 2) a duty for officers to intervene if observing fellow officers using inappropriate force.

2. Use of Force – Foot Pursuits

During 4th Quarter 2022 a draft Foot Pursuit policy agreed by the parties was presented to the CET. The CET provided feedback that was considered and incorporated into the policy where appropriate. Following tentative approval by the CET, this policy along with the three other policies in the Use of Force category were posted on the SPD website for public comment. Based on community feedback and lessons learned during the public comment period for the Use of Force – General policy, the SPD took significant steps to enhance the community engagement process for public comment. In addition to posting the draft policies for public comment in English, they were also professionally translated and offered in Spanish. The Superintendent and two other SPD members created a public facing video highlighting the policy changes and encouraging community feedback. The SPD also organized and participated in eleven community meetings to provide an overview of the drafts and to elicit feedback. DOJ and the CET attended and observed four of those community meetings during a December 2022 site visit.

Because foot pursuits are inherently dangerous and often result in injuries to subjects, officers and community members, the new policy provides clear limitations as to when they may be undertaken and outlines tactics that may or may not be applied during foot pursuits. It provides clear guidelines to officers, dispatchers, and supervisors.

The public comment period for this proposed Foot Pursuit policy expired December 19th. The parties then reviewed community feedback and proposed appropriate edits to the CET. The SPD developed preliminary training curriculum to align with this new policy.

3. Use of Force – Vehicle Pursuits

During the 4th Quarter 2022, a draft Vehicle Pursuit agreed by the parties was presented to the CET for review. The CET provided feedback and, where appropriate, edits were incorporated into the draft. Upon tentative approval by the CET, this policy was included in a package of four use of force policies posted for public comment. As acknowledged above, the SPD made a significant effort to announce the public comment opportunity and to educate community members on the new policy.

Similar to foot pursuits, vehicle pursuits are inherently dangerous and often lead to serious injuries. This new policy will provide clear guidance and limitations to officers, dispatchers, and supervisors as to when vehicle pursuits and certain tactics related to vehicle pursuits are prohibited or permitted.

As with other policies presented in this package, the public comment period for this proposed Vehicle Pursuit policy expired December 19th. The parties reviewed community feedback and proposed appropriate edits that were approved by the CET. The SPD has developed preliminary training curriculum to align with this new policy.

4. Use of Force – Investigation and Review

A comprehensive investigation and review of each use of force incident is essential in any professional police service working to establish and retain legitimacy and community trust. A draft policy on Use of Force - Investigation and Review agreed by the parties was presented to the CET during 4th Quarter 2022. Following incorporation of feedback by the CET, the policy was tentatively approved and posted for public comment in the aforementioned package with three other use of force related policies. It was addressed and discussed in the Superintendent’s video and at the series of public meetings held in December.

This policy provides very clear guidelines to officers, supervisors, and managers in respect to investigation and review of all use of force incidents.

The public comment period for this policy closed on December 19th. The parties reviewed feedback and incorporated appropriate edits into the policy that was then approved by the CET. The SPD developed preliminary training curriculum to support this new policy.

5. Use of Force – Reporting

This policy clearly delineates the reporting requirements for all use of force incidents. A draft agreed by the parties was presented to the CET during 4th Quarter 2022, and suggestions from the CET were incorporated as appropriate. Upon tentative approval by the CET, the policy was included in the package above presented to the community for public comment.

As with other policies in that package, the public comment period closed on December 19th. The parties reviewed feedback and presented proposed edits to the CET for approval. This policy was also covered in the preliminary training curriculum currently under development by the SPD.

6. Use of Force Data Collection and Analysis Protocol

The CET has yet to receive a draft of the Use of Force Data Collection and Analysis protocol. DOJ and the CET attended a demonstration of Blue Team, a software tool that the SPD intends to use to comply with this requirement. SPD is currently working with the vendor to align Blue Team fields with data collection fields outlined in new SPD use of force policies. A modern use of force database is an essential tool that will provide important and timely data to SPD supervisors and managers, City leaders and the community. It will also allow DOJ and the CET to analyze use of force data accurately when assessing compliance with the terms of the Settlement Agreement.

This process is ongoing and was not completed during 4th Quarter 2022 as contemplated. Nonetheless, SPD demonstrated it has made considerable progress on this project and it is anticipated that Blue Team will be fully implemented during 1st Quarter 2023.

Body Worn Camera Protocol

While the draft of an updated Body Worn Camera Protocol has been under development by SPD, a final version has been delayed pending the outcome of ongoing collective bargaining processes with both police unions. On December 23, 2022, the International Brotherhood of Police Officers Local 364 ratified a contract with the City that was reviewed and approved in early January by the Springfield City Council.

The SPD has indicated to DOJ and the CET that it will promptly present a new draft Body Worn Camera Protocol that aligns with the Settlement Agreement.

This policy will provide clear, updated guidance as to the use of body worn cameras and review of video files. When the CET receives the draft from the parties, it will expedite the review and approval process to allow the SPD to post the policy for public comment as soon as possible.

While this requirement was slated for completion 4th Quarter 2022, it was understandably delayed due to the ongoing collective bargaining process. The CET is optimistic that the city will achieve this requirement early in 1st Quarter 2023.

Field Training Policy

The timeline set forth for drafting and implementation of this policy has also been impacted by the collective bargaining process. The CET has not seen or reviewed draft policy in this area. SPD leadership has indicated they have draft policy ready to present to DOJ, but believed it was premature to share it prior to resolution of negotiations. The CET is hopeful that recent developments in the collective bargaining process will also lead to progress on this policy in early 2023.

Internal Investigations Unit

DOJ and the CET met formally with members of IIU and have interacted on several occasions with the recently appointed IIU Attorney. SPD also presented draft IIU policy to DOJ and the CET. This process and the development of an IIU manual have been undertaken by the City Solicitor's office. Significant effort has been applied to this project, the deadline for policy development has been met, and CET granted preliminary approval late in 4th Quarter 2022. Posting for public comment will take place in February 2023.

Potential Challenges

Board of Police Commissioners (BOPC)

The CET has heard numerous concerns from stakeholders related to the Board of Police Commissioners. Many of these concerns relate to the process by which Board members were appointed as well as the scope of the Board's authority. The Mayor's appointment authority for the BPC is established by city law. Also, Paragraph 117 of the Agreement specifically acknowledges that the Mayor has exclusive authority to appoint all Board members. However, the process for serving on the Board of Police Commissioners and the posting of BPC terms and open vacancies on the City's website are addressed in Paragraph 116 of the Agreement and are slated to be addressed by the parties during 1st Quarter 2023.

The Agreement also contains several paragraphs and requirements related to the operation of the Board of Police Commissioners. For instance, Paragraph 118 requires the creation of a manual that clearly sets out administrative processes "including but not limited to, prevention of bias in decisions, confidentiality requirements; how to conduct thorough reviews and evaluations of individual complaints; how to obtain documents and/or any additional evidence required to conduct an effective review of a civilian complaint; how to conduct effective reviews and hearings that lead to supportable disposition decisions; and how to make a disposition and impose discipline."

Among other provisions, the Agreement also calls for appropriate resourcing for the Board and training for its members.

In the timeline agreed by the parties, approved by the CET and submitted to the Court, there were no deadlines related to the Board of Police Commissioners in 4th Quarter 2022. Nonetheless, the process of appointing Board members and concerns related to Board governance are issues that have been raised continually in discussions and meetings with several community representatives and the parties.

The Board's legitimacy and performance are integral to accountability in the SPD, as well as to community trust and confidence. Accordingly, the CET believes the city must promptly act to ensure the Board has the training, resources, and support to conduct its duties effectively. Further, to build public trust in the Board of Police Commissioners and in the reform process more broadly, the city must make transparent the Board's processes and provide ample notice of Board hearings in the future. The city did not notify the CET or DOJ about the Board of Police Commissioners hearing on November 22, 2022. Going forward, maintaining strong lines of communication about BOPC events will be essential.

Implementation Capacity

We commend DOJ and the City for their highly collaborative efforts and the noteworthy progress they made during the first reporting period of the project. In addition to establishing strong working relationships and developing sensible, effective processes, the parties and the CET have focused primarily on the issue at the heart of the Settlement Agreement – police use of force. Much thought and collective effort have been dedicated to the development of leading-edge policies related to all aspects of force, force reporting and force investigation. The development of these policies and the subsequent process of engaging with the community to elicit helpful feedback to incorporate into final drafts have been productive, but also demanding and time consuming.

To date, a small group of City and DOJ representatives have worked rigorously to produce quality outcomes. In other jurisdictions undergoing similar processes, significantly larger teams of police department personnel and city lawyers collaborate to meet timelines and satisfy requirements. In ongoing meetings with the parties, the CET has expressed concern that it will be challenging for the parties, particularly the core City team, to maintain this demanding pace going forward. Often these responsibilities have been borne by individuals who have other significant responsibilities. The individuals at the forefront of this project for the SPD and the City have continually reassured the CET that they are committed to accomplishing their tasks properly and according to the agreed timelines, but it will be a significant challenge to maintain the current pace.

Notwithstanding current SPD staffing challenges, the Superintendent recently assigned two additional SPD members to assist full-time on the project. The CET and the Court have encouraged the city to also consider leveraging external resources that may be available to assist, for instance, faculty and graduate students from academic institutions in the region.

Collective Bargaining

The CET acknowledges in the body of this report and in the chart depicting agreed timelines that there are several requirements contingent on contractual provisions in the agreements with the International Brotherhood of Police Officers (IBPO) Local 364 and the Springfield Police Supervisors Association. During its second site visit to Springfield, the CET appreciated the opportunity to meet with the leaders of both unions and to listen to their perspectives. The CET looks forward to ongoing communication with labor organizations representing members of the SPD, sworn and civilian.

On December 22, 2022, members of the IBPO voted in favor of a new contract. The City approved that contract on January 8, 2023. City representatives have indicated that the new contract addresses several requirements in the Settlement Agreement that were temporarily on hold pending the outcome of collective bargaining. The ratification of the IBPO contract is good news indeed. The Supervisors' union contract has not been resolved and the matter is now being scheduled for arbitration.

Community Engagement

During this first reporting period, the CET benefitted significantly from opportunities to engage with a wide range of stakeholders, including a diverse cross-section of community members. We greatly value these relationships and will continue to involve community at the heart of our work.

It is important to acknowledge at this point the very broad range of perspectives on policing in Springfield. During several public and private meetings, we have heard many community members laud the fine work of Springfield police officers. Indeed, we have met many impressive department members during our site visits and appreciate their commitment to service, particularly during these challenging times. On the other hand, we have heard many others express disappointment and mistrust. Based on their lived experiences, they have little confidence in the SPD's ability to provide an effective and fair police service. Indeed, many point to the results of DOJ's investigation as evidence of their concerns.

Certainly, we have witnessed similar ranges of opinion in other jurisdictions. We accept that there are different versions of truth based on personal experiences. The CET will continue to listen carefully and consider all perspectives during the course of our work. Our hope is that, over time, we can also be a conduit between the SPD and some community members who are currently disaffected. After all, the CET, the parties, and all community members share the same collective goal – a professional police service that provides fair, impartial, and effective service to all.

Although we categorize this as a challenge, we believe this process also provides an opportunity to enhance engagement between the SPD and the broad range of community members they serve.

Looking Forward

Rows 20-69 of **Appendix A** reflect the priorities and deliverables expected in 1st Quarter and 2nd Quarter 2023.

1st Quarter 2023

As evidenced in rows 20-51 of **Appendix A**, the CET expects momentum to continue and demands on the parties to increase during 1st Quarter 2023. The priority will be to wrap up 4th Quarter 2022 items that remain outstanding. Also, during 1st Quarter 2023, additional policies will be developed by the parties and reviewed by the CET and the community. Required training on new policies will take place and the CET will review and monitor that training. The CET will also develop metrics, particularly related to use of force and accountability systems, to assess outcomes following implementation of these policies.

In addition to new policies and training, three important manuals will be developed collaboratively by the parties, assisted by the CET: 1) IIU Manual (addressing internal investigations processes); 2) Board of Police Commissioners Manual; 3) FIT (Force Investigation Team) Manual. These manuals will provide

comprehensive guidance to those responsible for investigating complaints and misconduct, investigating use of force incidents, and adjudicating serious disciplinary cases.

Also, noteworthy for next quarter, the SPD will develop and submit for approval a formal Community Engagement Plan.

2nd Quarter 2023

2nd Quarter 2023 will be equally rigorous. There will be continued focus on requirements related to the Board of Police Commissioners. Training for the Use of Force Committee will be approved and delivered. FIT manual training will also take place. An electronic system to track training will be identified and approved. There will be considerable work on policies related to promotions and assignments, and general supervisor training will be approved and offered. By the end of the quarter, SPD will be required to issue an annual report summarizing complaints and discipline that will include trends and dispositions, Board of Police Commissioners' discipline decisions, and information relative to the Board's public outreach functions. Finally, the SPD will be required to develop, submit for approval, and implement an officer wellness program.

Conclusion

It has certainly been a privilege to engage with the parties and members of the Springfield community during this first reporting period. Again, the CET wants to acknowledge the professionalism, commitment and work ethic demonstrated by representatives of the parties during this rigorous process. Also, the CET cannot overstate its appreciation to City leaders, community groups and individual community members who have taken the time to contribute enthusiastically and constructively to this process.

Thanks to all of you, much was accomplished during this first reporting period. Some timelines agreed by the parties were missed, but for understandable reasons. Nonetheless, progress has been made in every category and the CET is confident that any delays will be addressed in 1st Quarter 2023. We look forward to continuing our collaborative work with the parties and the community.

Appendix A: *First Year Compliance Evaluator Plan*

[Compliance Evaluator Report | February 2023](#)

First Year Compliance Evaluator Plan

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, 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 Comp	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 th 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 th 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 th 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 th 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 th 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 th Quarter 2022
7	175, 176	Body Worn Cameras	Body Worn Camera Protocol	SPD will consider whether any further revisions to the Body Worn Camera protocol are appropriate in light of	SPD	Consideration of Public Comments Regarding Body	4 th Quarter 2022

				public feedback received and revise its policy accordingly.		Worn Camera Protocol	
8	#	Body Worn Cameras	Body Worn Camera Protocol	The Compliance Evaluator will provide final approval of the Body Worn Camera protocol.	CE	Final Approval or Disapproval of Body Worn Camera Protocol	4 th Quarter 2022
9	136	Force	UOF Data Analysis Protocol	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 th Quarter 2022
10	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.	CE	Preliminary Approval or Disapproval of FTEP Policy	4 th Quarter 2022
11	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	4 th Quarter 2022
12	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	4 th Quarter 2022
13	#	Training (Field)	Policy	The Compliance Evaluator will provide final approval of the FTEP policy.	CE	Final Approval or Disapproval of FTEP Policy	4 th Quarter 2022
14	86	Accountability	Internal Investigations Unit	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 th Quarter 2022
15	175, 176	Accountability	Internal Investigations Unit	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 th Quarter 2022

16	175, 176	Accountability	Internal Investigations Unit	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 th Quarter 2022
17	#	Accountability	Internal Investigations Unit	The Compliance Evaluator will provide final approval of the IIU policies.	CE	Final Approval or Disapproval of IIU Policies	4 th Quarter 2022
18	86	Accountability	Internal Investigations Unit	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 th Quarter 2022
19	86	Accountability	Internal Investigations Unit	Using the approved training curricula, SPD will deliver training on the IIU policies.	SPD	Delivery of IIU Policies	4 th Quarter 2022
20	19	Force	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 force policies.	CE	Final Approval or Disapproval of Force Training Curricula	1 st Quarter 2023
21	19	Force	Training	Using the approved training curricula, SPD will deliver use of force training to relevant personnel.	SPD	Delivery of Use of Force Training	1 st Quarter 2023
22	196	Force	Compliance Evaluator Assessment	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 st Quarter 2023
23	170	Body Worn Cameras	Body Worn Camera Protocol	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 st Quarter 2023

24	170	Body Worn Cameras	Body Worn Camera Protocol	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 st Quarter 2023
25	141, 142	Training (Field)	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 FTEP policy.	CE	Final Approval or Disapproval of FTEP Training Curricula	1 st Quarter 2023
26	142	Training (Field)	Training	Using the approved training curricula, SPD will deliver training on the FTEP policy to relevant personnel.	SPD	Delivery of FTEP Training	1 st Quarter 2023
27	116	Accountability	Board of Police Commissioners	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 st Quarter 2023
28	207	Public Engagement	Community Engagement Plan	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 st Quarter 2023
29	209	Public Engagement	Community Outreach and Public Information Program	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 st Quarter 2023
30	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	Pending Collective Bargaining

31	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	Pending Collective Bargaining
32	175, 176	Accountability	Disciplinary Matrix	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	Pending Collective Bargaining
33	#	Accountability	Disciplinary Matrix	The Compliance Evaluator will provide final approval of the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix	Pending Collective Bargaining
34	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	Pending Collective Bargaining
35	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	Pending Collective Bargaining
36	118	Accountability	Board of Police Commissioners Manual	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 st Quarter 2023
37	87	Accountability	Internal Investigations Unit Manual	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 st Quarter 2023
38	175, 176	Accountability	Internal Investigations Unit Manual	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 st Quarter 2023
39	175, 176	Accountability	Internal Investigations Unit Manual	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	1 st Quarter 2023

						Regarding IIU Manual	
40	#	Accountability	Internal Investigations Unit Manual	The Compliance Evaluator will provide final approval of the IIU Manual.	CE	Final Approval or Disapproval of IIU Manual	1 st Quarter 2023
41	119	Accountability	Board of Police Commissioners	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 st Quarter 2023
42	175, 176	Accountability	Board of Police Commissioners	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 st Quarter 2023
43	69	Force	Use of 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	1 st Quarter 2023
44	175, 176	Force	Use of 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	1 st Quarter 2023
45	175, 176	Force	Use of Force Committee	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 st Quarter 2023
46	#	Force	Use of Force Committee	The Compliance Evaluator will provide final approval of the UFC policy.	CE	Final Approval or Disapproval of UFC Policy	1 st Quarter 2023
47	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	1 st Quarter 2023

48	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	1 st Quarter 2023
49	175, 176	Force	FIT Manual	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 st Quarter 2023
50	#	Force	FIT Manual	The Compliance Evaluator will provide final approval of the FIT Manual.	CE	Final Approval or Disapproval of the FIT Manual	1 st Quarter 2023
51	122	Accountability	Summary of BPC Meetings	SPD will post a quarterly summary of BPC meetings and hearings on the City's website.	SPD	Posting of BPC quarterly summary	1 st Quarter 2023
52	175, 176	Accountability	Board of Police Commissioners	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 nd Quarter 2023
53	#	Accountability	Board of Police Commissioners	The Compliance Evaluator will provide final approval of the BPC training.	CE	Final Approval or Disapproval of BPC Training	2 nd Quarter 2023
54	119	Accountability	Board of Police Commissioners	Using the approved training curricula, the city will deliver BPC training to relevant personnel.	City	Delivery of BPC Training	2 nd Quarter 2023
55	71	Force	Use of 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	2 nd Quarter 2023
56	71	Force	Use of Force Committee	Using the approved training curricula, SPD will deliver training on the UFC policy to relevant personnel.	SPD	Delivery of UFC Training	2 nd Quarter 2023
57	64	Force	FIT Manual	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will	CE	Final Approval or Disapproval of FIT Manual	2 nd Quarter 2023

				provide final approval of the training curricula for the FIT Manual.			
58	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	2 nd Quarter 2023
59	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	2 nd Quarter 2023
60	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	2 nd Quarter 2023
61	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 opportunities for the public to comment on the policies.	SPD	Posting of Promotions and Assignments Policies for Public Comment	2 nd Quarter 2023
62	175, 176	Supervision	Promotions and Assignments	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 nd Quarter 2023
63	#	Supervision	Promotions and Assignment	The Compliance Evaluator will provide final approval of the promotions and assignments policies.	CE	Final Approval or Disapproval of Promotions and Assignments Policies	2 nd Quarter 2023
64	167	Supervision	Promotions and Assignments	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will	CE	Final Approval or Disapproval of Promotions and	2 nd Quarter 2023

				provide final approval of the training curricula for the promotions and assignment policies.		Assignments Curricula	
65	169	Supervision	Officer Assistance and Support	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 nd Quarter 2023
66	169	Supervision	Officer Assistance and Support	SPD will implement the approved officer wellness program.	SPD	Implementation of Approved Officer Wellness Program	2 nd Quarter 2023
67	152	Supervision	General Supervisor 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	2 nd Quarter 2023
68	152	Supervision	General Supervisor Training	Using the approved training curricula, SPD will deliver training on the general supervisor training to relevant personnel.	SPD	Delivery of General Supervisor Training	2 nd Quarter 2023
69	124	Accountability	Annual Report re 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	2 nd Quarter 2023
70	140	Training	Training Plan	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 rd Quarter 2023
71	167	Supervision	Promotions and Assignments	Using the approved training curricula, SPD will deliver training on the promotions and assignment policies to relevant personnel.	SPD	Delivery of Promotions and Assignments Training	3 rd Quarter 2023
72	155, 160	Supervision	Early Intervention System	SPD will develop Early Intervention System (EIS), EIS protocol, and individualized interventions.	SPD	Final Approval or Disapproval of Early Intervention System	4 th Quarter 2023

73	164	Supervision	Early Intervention System Training	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 th Quarter 2023
74	164	Supervision	Early Intervention System Training	Using the approved training curricula, SPD will deliver EIS training to relevant personnel.	SPD	Delivery of EIS Training	4 th Quarter 2023
75	212	Public Engagement	Survey	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 th Quarter 2023
76	212	Public Engagement	Annual Report re Community Engagement Efforts	SPD will post a publicly available report of its community engagement efforts, including a breakdown by district.	City	Posting of Community Engagement Report	4 th Quarter 2023