BerryDunn

Key Staffing and Operations Review for Village of Oak Park

Version 1.0

Oak Park

Submitted by:

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Project Overview

In November 2021, the Village of Oak Park (Village), Illinois, contracted with BerryDunn to conduct an operational assessment of the Oak Park Police Department (OPPD). The overall project included four specific areas in relation to the OPPD:

1. Full management and operational assessment study
2. Audit of race equity issues (internal and external)
3. Recommendations and research for alternative response to traditional police services
4. Presentation of successful measures to contribute to Fair and Impartial Policing (FIP), which have been accomplished in similar cities

During the project, BerryDunn conducted more than 50 interviews with staff, government officials, and select community members identified by OPPD. Community members also had the opportunity to provide direct feedback through several in-person and virtual town hall meetings, and through online feedback to BerryDunn through Social Pinpoint, a customized website provided by BerryDunn. Staff from the OPPD completed an in-house workforce survey and provided BerryDunn with substantial information through numerous other data-gathering instruments. Finally, BerryDunn conducted significant analysis of current data and new data generated as part of this assessment and produced a series of findings and recommendations.

Studies of this nature are predisposed toward the identification of areas requiring improvement, and accordingly, they have a propensity to present what needs work, without fully acknowledging and highlighting positive aspects of an organization. This report follows a similar progression. Because of the numerous recommendations contained within this study, those consuming this report might mistakenly conclude that the police department is in a poor condition. BerryDunn wishes to state the opposite quite clearly. Although this report contains several areas for improvement, and the OPPD has faced some challenges in recent years, particularly related to staffing, BerryDunn made many positive observations of the OPPD, some of which are examples of best practices that other agencies would do well to emulate. Examples of best practices within the OPPD include:

- Posting 10 Shared Principles and Guiding Principles and Values in the Patrol Room
- Resident Beat Officer (RBO)/Neighborhood Relations Officer (NRO) program for community-oriented policing (COP) and problem-oriented policing (POP)
- Dedicated COP foot patrols
- Staggered shifts for investigators
- Training officers on the history of Oak Park

Notwithstanding the findings and recommendations outlined in this report, the OPPD is a generally efficient and effective agency with a commitment to community policing, and staff

provided BerryDunn with several examples of collaborative problem-solving efforts. Staff at all levels present a high level of commitment and pride in their work.

The OPPD provided BerryDunn unfettered access to staff and all data at its disposal, without reservation or hesitation. It was evident to the BerryDunn team that the command staff at the OPPD want what is best for the agency and the community, and they are willing to take the necessary steps to help ensure positive and appropriate change takes place.

This assessment examined more than 20 primary areas of department operation (distributed throughout the chapters of this report), as well as several sub-areas and specialized positions. BerryDunn's analysis determined that several areas within the police department require adjustment to assist the OPPD in meeting service demands, improving operational efficiency, and sustaining positive relationships and trust between the police department and the community. This study provides 42 recommendations, separated into three rank-prioritized categories, following five major themes:

- Staffing (including recruiting, hiring, and retention)
- Personnel development
- Policies and procedures
- Impartial policing and transparency
- Technology utilization
- Training

This report outlines the process and methodology BerryDunn used to conduct the assessment of the police culture and practices of the OPPD. The analysis provided by BerryDunn is balanced, and it fairly represents the conditions, expectations, and desired outcomes studied, and those that prompted and drove this assessment. Where external data was used for comparison purposes, references have been provided.

BerryDunn stands behind the core finding statements and purposes of the recommendations provided; however, the OPPD might implement those recommendations in several ways. Although BerryDunn has provided guidance and prompts within many of the recommendations, the OPPD should select an implementation approach that works best for its culture and environment. BerryDunn also wishes to express its appreciation for the opportunity to collaborate with the Village of Oak Park and the OPPD on this important project.[1]

[1] Portions of this report and the data within it have been reproduced from publicly available documents.

Relevant Background

This assessment was prompted, at least in part, by national and local conversations around policing that followed the murder of George Floyd in 2020. Following the Floyd murder, some within the Village raised questions about Oak Park's police force and whether adjustments should occur. This led to a series of local discussions and also to a report produced by Freedom to Thrive (FTT), a group of community organizers in Oak Park, which examined various OPPD policing data and practices. BerryDunn obtained a copy of the report, including the impartial policing data (IPD) used in creating it, and analyzed that data in conjunction with more current IPD provided to BerryDunn as part of this project.

BerryDunn has provided significant analysis and reporting on these data in Chapter 5, including analysis on both the IPD received from FTT and the more current IPD obtained. In short, BerryDunn achieved similar results in conducting an independent analysis of the data provided in the FTT report and noted the data in that report essentially mirrored the results BerryDunn developed from the more current IPD provided by the OPPD as part of this project. Acknowledging what these quantitative data reflect is a critical first step and doing so can help position the Village and OPPD improve its public safety processes and practices. However, by themselves, these data (from both datasets) provide only an observable and quantifiable condition (expressing what), not one that explains the circumstances that may be causing it (explaining why).

In Chapter 5, BerryDunn looks more closely at various OPPD systems and procedures and provides a series of recommendations to help ensure best practice impartial policing strategies for the OPPD. Those recommendations seek to eliminate policies and field practices that have the potential to create biased outcomes, while simultaneously helping to ensure that the OPPD can appropriately carry out its public safety mission. It is BerryDunn's expectation that the recommendations in Chapter 5 and elsewhere within this report will position the Village, the OPPD, and the Citizen Police Oversight Committee (CPOC) to critically monitor and manage the policing practices affecting those who live in and visit the Village of Oak Park.

Project Introduction and Summary

Within this final report and its appendices, and within two partner documents, BerryDunn has provided various information, tables, and figures as a means to validate and substantiate the observations of the team, as well as the associated recommendations. The two partner documents to this report include the Supplemental Data and Information report (SDI), which contains numerous tables and figures, and the Operational Assessment Reference Material (OARM) report, which includes reference material relevant to the OPPD project. BerryDunn will add a footnote when referencing supporting materials in the SDI report or suggest the OPPD review a specific section within the OARM for additional information on a given topic.

The formal recommendations from this project can be found in three sections:

- First, a summary of the principal findings and recommendations is provided below. This is intended to provide consumers with a quick reference list of the formal recommendations made in this assessment.
- Second, recommendations are included at the end of each chapter to which they apply. Each chapter recommendation is the result of the topical analysis from that chapter and each includes a summary of the basis for the recommendation.
- Third, for ease of review, each of the full recommendations is included sequentially within the SDI Appendix A.

BerryDunn has separated formal recommendations into three prioritized categories in rank order. The seriousness of the conditions or problems that individual recommendations are designed to correct, their relationship to the major priorities of the community and the department, the probability of successful implementation, and the estimated cost of implementation are the principal criteria used to prioritize recommendations. Table 0.1 provides a description of the priority levels used for the recommendations.

Table 0.1: Priority Descriptions

Overall Priorities for Findings and Recommendations	
	**Critical/Priority** – These recommendations are very important and/or critical, and the agency should prioritize these for action.
	**High/Primary** – These recommendations are less critical, but they are important and should be prioritized for implementation.
	**Medium/Non-Urgent** – These recommendations are important and less urgent, but they represent areas of improvement for the agency.

BerryDunn provided all Critical/Priority recommendations to the OPPD in an Emergent Issues Memo, midway through this assessment, due to their pressing nature. BerryDunn presented this information early in the process to allow the OPPD to take prompt action in these areas, instead of waiting for the development of the full report and findings.

BerryDunn has provided a summary of the full recommendations and findings in the Principal Findings and Recommendations section of this report. The format of this information is provided in Table 0.2.

Table 0.2: Short Recommendation Format

Chapter: The Policing Environment		
No.	**Finding**	**Recommendation**
1-1	**Brief Finding Statement**	**Succinct Recommendation Statement**

This format provides readers with a quick review of the findings and recommendations. The format for the full recommendations is included in Table 0.3. Each finding and recommendation includes a description of the details supporting the recommendation, as well as details regarding areas for agency consideration. Again, BerryDunn has provided each of the full recommendations in the body of the report and in SDI Appendix A.

Table 0.3: Full Recommendation Format

[Chapter and Title]		
No.	**Issue and Opportunity Description**	**Overall Priority**
Chapter Section:		
1-1	**Finding Area: (Finding Statement).** Supporting information regarding the finding.	
	Recommendation: (Succinct Recommendation Statement). Additional details concerning the recommendation, including items for consideration.	

Changing Conditions

The OPPD is a dynamic and ever-changing organization. BerryDunn recognizes that numerous changes have taken place since the start of this assessment in late 2021. This includes some areas in which BerryDunn had made formal recommendations. Understandably, it has been necessary to freeze conditions in order to prepare this report. The most current information on the conditions of the organization resides with the command staff of the police department, including information on actions that constitute consideration and implementation of the recommendations included in this report.

In addition, the OPPD has provided BerryDunn with a brief outline of its actions taken during this assessment, including those that relate to the early recommendations provided. This information is detailed in SDI Appendix B. Notable changes outlined in SDI Appendix B that relate directly to recommendations include:

- Adjusting personnel assignments and duties to close operational gaps
- Working on expanded community engagement and transparency
- Reviewing all current and new policies for conversion to the new policy system
- Seeking training related to the recommendations, including recruitment and retention, and internal affairs training for those conducting those investigations

The above is a brief summary of the many actions the OPPD has taken during this study. BerryDunn found the OPPD very responsive to recommendations and suggestions throughout this project.

Principal Findings and Recommendations

Critical/Priority Findings and Recommendations

Community Engagement		
No.	**Finding**	**Recommendation**
5-6	The OPPD is not consistently collecting impartial-policing data on traffic stops and other non-consensual police contacts. Staff lacks clarity on this policy and how it should be applied. In addition, the OPPD does not collect or record subject data in its records management system (RMS) on all police-related contacts (including calls for service).	The OPPD should clarify its impartial-policing data collection policies, provide training to officers on applying these policies, and monitor compliance. In addition, the OPPD should develop and implement a policy for collecting subject data on all police-related contacts for entry into RMS.
Operational Policies		
No.	**Finding**	**Recommendation**
7-2	Because the OPPD is using a mix of policies from its current manual and a new source (Lexipol), staff lacks clarity on prevailing policy, and in some cases, lack policy understanding.	The OPPD should implement practices to ensure that staff are clear on which policies are in force, and provide training so that staff understand the contents of all policies they are responsible for following.
Data, Technology, and Equipment		
No.	**Finding**	**Recommendation**
8-1	The RMS in use by the OPPD is not supporting operational needs. The RMS has multiple limitations, including data entry and data mining, both of which are critical to leveraging data in support of operations and impartial policing.	The OPPD should pursue acquisition of a more modern and robust RMS that is capable of supporting its data needs.
Data, Technology, and Equipment		
No.	**Finding**	**Recommendation**
8-6	There are numerous challenges with the current police facility, and it does not contribute to efficient and effective operations. More importantly, several security risks in the facility are likely uncorrectable, which create various liability and safety concerns for the Village and staff.	The Village should take steps to pursue a new police facility to improve operational efficiencies, to help ensure compliance with industry best practices and standards, and to reduce security and risk issues that exist within the current facility.

Professional Standards/Internal Affairs		
No.	**Finding**	**Recommendation**
11-1	The OPPD has policies that outline the Internal Affairs/Professional Standards complaint process and the associated investigations. These policies do not provide guidance on resolution of complaints occurring at the supervisor level that are not routed for informal or formal investigation, nor do they specify appropriate documentation practices for these instances.	The OPPD should provide clear policy on how minor complaints resolved by supervisors are documented. Policy should direct that all complaints received related to employee misconduct, whether resolved at the supervisor level or investigated as informal or formal complaints, should be consistently documented and stored in a central repository. All complaints, regardless of their categorization, should contain basic complaint and complainant information, and a summary of the supervisor's actions relative to the complaint.

High/Primary Findings and Recommendations

Organizational Leadership and Culture		
No.	**Finding**	**Recommendation**
2-1	In its current state, internal communication within the OPPD is not fully serving the needs of the organization.	The OPPD should develop an internal communication strategy.
Patrol Services		
No.	**Finding**	**Recommendation**
4-2	The OPPD has used alternative CFS response on a limited basis, but opportunities exist to significantly expand upon alternative CFS response methods and resources.	The OPPD should develop a comprehensive alternative CFS response plan and seek approval from the Village Council on the new model.
Patrol Services		
No.	**Finding**	**Recommendation**
4-5	The OPPD's current RMS provides the opportunity to utilize automated solvability factors on investigations, but those solvability factors are used only informally, and field personnel do not have access to add them.	The OPPD should require utilization of automated solvability factors available within RMS. These should be completed by patrol staff and reviewed by patrol supervisors as a part of the incident report approval process.

Community Engagement		
No.	**Finding**	**Recommendation**
5-3	In general, the OPPD has enjoyed a positive reputation within the community, based on its long-standing COP efforts and its overall service to the Village. However, national calls for reforming the policing industry, as well as local concerns recently raised, demand an appropriate response. For the OPPD, there is a need to build community trust, particularly with traditionally marginalized populations.	The OPPD should expand and formalize its COP efforts, and pursue a collaborative model to further community involvement in police decision-making, to build upon and sustain the trust relationship the OPPD enjoys with the community, and to develop those relationships where they are lacking.
Community Engagement		
No.	**Finding**	**Recommendation**
5-4	In its current configuration, the CPOC is limited in its ability to provide meaningful oversight of OPPD complaints, and to promote operational changes or procedural adjustments that could improve public safety services and staff accountability. Significant adjustments to the CPOC's role and charter are needed to improve its value and effectiveness.	The OPPD should make changes to the CPOC ordinance/charter to improve its value to the community. Changes should be made to improve the CPOC's ability to monitor investigations and influence outcomes, and to make policy and procedural recommendations to improve public safety services, staff accountability, and transparency for the community.
Community Engagement		
No.	**Finding**	**Recommendation**
5-5	The Village and OPPD have been promoting the progressive and inclusive nature of their community and police department for decades. Although staff acknowledge this history, there is a sense that the OPPD could do more to promote, understand, and address DEI perspectives, both internally and externally.	The OPPD should establish a DEI committee and charge that group with the responsibility to monitor DEI elements that impact operations and personnel, including hiring and promotional processes. The DEI committee should also be responsible for monitoring external initiatives of the OPPD that have a DEI focus.
Community Engagement		
No.	**Finding**	**Recommendation**
5-7	Responding to community CFS of suspicious persons or events is a common activity for the OPPD. Many officer-initiated contacts with pedestrians, vehicles, or bicyclists are labeled suspicious. The term suspicious is non-specific, which can create an opportunity for bias-based contacts.	The OPPD should change its approach to responding to suspicious incidents, and thoroughly document any suspicion-related contacts, whether community- or officer-initiated.

Community Engagement		
No.	**Finding**	**Recommendation**
5-8	The OPPD regularly conducts consensual searches of people and/or their property, without a formal waiver and/or documentation of the basis for the search.	The OPPD should establish a policy that requires a signed waiver for any consent searches of a person or their property. The policy should also specify that whenever possible, the consent should also be recorded by dash camera, or body worn camera (BWC), if available.
Chapter		
No.	**Finding**	**Recommendation**
5-9	The OPPD regularly engages in pretext stops for the purpose of identifying possible illegal activity. Pretext stops can create an opportunity for bias-based contacts.	The OPPD should create a policy that restricts the use of pretext stops. The policy should state that stops, for whatever reason, should focus on the infraction, and clarify that expanding the scope of an initial stop is not allowed, unless there are specific articulable facts developed within the scope of the initial contact that prompt additional inquiry. The policy should also clarify that if an expansion of a stop occurs, these facts must be documented in RMS and the impartial policing database (IPD).
Community Engagement		
No.	**Finding**	**Recommendation**
5-11	The OPPD has not routinely monitored or evaluated the IPD collected by officers regarding its non-consensual encounters with individuals. Monitoring and evaluating this data is a critical step in identifying possible biased policing patterns, and in developing strategies to correct them.	The OPPD should regularly monitor and evaluate its IPD to identify patterns that reflect possible bias. The OPPD should use the data to assist with development of strategies to correct possible biased policing patterns, and monitor the data on an ongoing basis to evaluate the success of operational adjustments implemented to mitigate them.

Community Engagement		
No.	**Finding**	**Recommendation**
5-12	Elements of Village ordinances have the potential to create disparate impact for marginalized populations. OPPD ordinance enforcement processes and procedures have a similar potential, as well as the potential for bias in enforcement.	The Village and OPPD should make adjustments to its ordinances. The Village should modify the damage to Village property ordinances, rescind the vehicle seizure and impoundment ordinance, and develop a new ordinance for retail theft. The Village should also work with the prosecutor's office to explore and implement a practice of citation in lieu of arrest.
Investigations Services		
No.	**Finding**	**Recommendation**
6-1	The RMS of the OPPD has the ability to track and monitor case assignments and progress for investigations. Interviews with investigators and supervisors indicate varied methods of case monitoring. The OPPD is not maximizing the use of its RMS to monitor case assignments, and supervisors are not formally and consistently monitoring cases of investigators within the unit.	The OPPD should take steps to more appropriately use the RMS to track and monitor case assignments and progress by investigators. Supervisors should be required to conduct periodic case reviews for all open cases, and to document case reviews and expectations, consistent with department standards on case updates and expected closure dates.
Operational Policies		
No.	**Finding**	**Recommendation**
7-1	There are several areas within the OPPD policies or procedures that are either lacking, missing, or should be considered for revision.	The OPPD should review BerryDunn's findings and recommendations concerning department policies, and consider adding or amending policies based on that review.
Operational Policies		
No.	**Finding**	**Recommendation**
7-3	The OPPD does not have a formal process that intentionally seeks input, both internal and external, on policy revisions and development, and there is not a clear pathway for department members to recommend policy additions/revisions and to receive feedback.	The OPPD should develop a formal process to solicit input from OPPD staff on any significant policy revision, or when considering the development or adoption of any new policy. The policy should also consider community involvement in major policies that will affect them.

Data, Technology, and Equipment		
No.	**Finding**	**Recommendation**
8-2	There are significant limitations to the RMS currently used by the OPPD. The OPPD can overcome some of these limitations through system configuration and process revisions.	The OPPD should make revisions to its RMS and processes, to improve the effective use of the RMS.
Data, Technology, and Equipment		
No.	**Finding**	**Recommendation**
8-4	The OPPD has two portals for entering impartial policing data: the racial profiling (impartial policing) portal, and the field contact portal. The two portals collect similar data, and there has been confusion among officers on which to portal to use when, and for what purpose.	The OPPD should merge the functions of the impartial policing portal and the field contact portal for all data that relates to impartial policing. All impartial policing data should be collected through this single portal, consistent with OPPD policy and the other recommendations of this study.
Training and Education		
No.	**Finding**	**Recommendation**
9-2	The OPPD does not have a plan that establishes a department-wide training strategy.	The OPPD should develop a broad training plan that establishes a department-wide training strategy, which also outlines the types of training that coincide with certain job duties, and decisions regarding approval of training for officers, and the OPPD should use these guidelines as a framework for its ongoing training needs.
Training and Education		
No.	**Finding**	**Recommendation**
9-3	The OPPD has not consistently trained its sworn personnel in several important and high-risk areas.	The OPPD should add specific training to its in-service training requirements to help ensure sworn personnel are regularly trained in important and high-risk areas.
Recruitment, Retention, and Promotion		
No.	**Finding**	**Recommendation**
10-1	The OPPD does not have a formal recruiting plan that supports a specific and focused effort at recruiting. Recruiting is currently managed by Village staff, and there has been limited effort to significantly expand recruiting efforts beyond traditional approaches.	The OPPD should develop a strategic recruiting plan that explores all possible options for improving the recruiting and hiring of officers. The plan should outline the goals and objectives of the OPPD in building and maintaining a diverse and quality workforce that represents the department's core values.

Recruitment, Retention, and Promotion		
No.	**Finding**	**Recommendation**
10-2	The OPPD does not have a strategic approach to retaining staff, and in particular, sworn staff.	The OPPD should develop a retention plan that includes specific steps intended to create an atmosphere that recognizes the long-term value of officers and other staff.
Professional Standards/Internal Affairs		
No.	**Finding**	**Recommendation**
11-2	The OPPD generally assigns high-profile and serious personnel complaints to designated personnel who have received specialized training on conducting IA investigations. In other cases, supervisors within the OPPD who lack training in IA investigations have been assigned to conduct IA complaints that could result in discipline to the staff member under investigation.	Due to the specific laws, rules, and protocols associated with IA investigations, the OPPD should develop a policy and practice that only staff with appropriate training in IA investigations will be allowed to conduct IA investigations.

Medium/Non-Urgent Findings and Recommendations

Organizational Leadership and Culture		
No.	**Finding**	**Recommendation**
2-2	OPPD does not have a formal staff development system that includes systems or mechanisms for consistent coaching, mentoring, or succession planning.	BerryDunn recommends OPPD develop a formal coaching, mentoring, and succession planning program for staff and that the program be memorialized in policy and executed consistently in practice.
Organizational Leadership and Culture		
No.	**Finding**	**Recommendation**
2-3	The current performance evaluation system is generic and is considered marginally useful at all levels of the OPPD organization.	The OPPD should engage a collaborative process to evaluate the current performance appraisal system in use, to develop a system that will more closely conform to the needs and desires of the leadership and staff within the department.

Operations and Staffing		
No.	**Finding**	**Recommendation**
3-1	Unfunded mandates by the State of Illinois have created an operational burden for the OPPD in managing BWC data and facilitating the BWC program, including all required training. The Administrative Section has one commander, and one records supervisor, but no other supervisory personnel overseeing the remaining units or personnel.	The OPPD should add an administrative supervisor to the Administrative Section to support operations. This supervisor should oversee the BWC program, and the other units within the Administrative Section, other than records.
Operations and Staffing		
No.	**Finding**	**Recommendation**
3-2	The OPPD can gain operational efficiency and reduce costs by utilizing non-sworn personnel more effectively.	The OPPD should review its use of CSOs, internally and in the field, and expand their duties and responsibilities. In addition, the OPPD should revise the job descriptions and duties for records staff to allow for cross-category work.
Operations and Staffing		
No.	**Finding**	**Recommendation**
3-3	Evidence collection efforts used by the OPPD that rely on specific sworn personnel are not efficient.	The OPPD should adjust its evidence collection processes to improve operational efficiency.
Patrol Services		
No.	**Finding**	**Recommendation**
4-1	The patrol work schedule for the OPPD is not effectively or efficiently meeting staffing and personnel distribution needs for the department.	The OPPD should consider revising the patrol work schedule to maximize efficiency and distribution of personnel.
Patrol Services		
No.	**Finding**	**Recommendation**
4-3	Records personnel are regularly revising NIBRS data on many criminal incidents because of errors by field personnel, and this prohibits fully automating the NIBRS reporting process.	The OPPD should take steps to improve its quality control measures for NIBRS entry to minimize errors and the need for Records personnel to correct them.

Patrol Services		
No.	**Finding**	**Recommendation**
4-4	The OPPD does not currently utilize a lethality assessment program for domestic violence.	The OPPD should revise its policy and practices to expand its DV investigation protocols to include a lethality assessment program.
Community Engagement		
No.	**Finding**	**Recommendation**
5-1	The OPPD has a strong COP philosophy that has been successful in many ways. However, the OPPD does not provide ongoing COP training, lacks a clear explanation of department expectations for COP efforts for officers, and does not track those efforts substantially.	The OPPD should build processes, opportunities, and expectations for all members of the OPPD to actively support community policing by expecting all team members to engage in active, deliberate, and meaningful relationship-building and problem-solving with the community.
Community Engagement		
No.	**Finding**	**Recommendation**
5-2	The OPPD has formed partnerships with advocate organizations and other law enforcement and non-law enforcement agencies. Many of these partnerships have been effective and are representative of innovation and best practices within the industry. Although these partnerships have been beneficial, the OPPD does not maintain a repository of active partnership agreements and does not review or monitor partnerships to assess whether they continue to meet operational goals and community needs.	The OPPD should engage a process to identify all current external partnerships, formal or informal. The OPPD should review the purpose of the partnerships and their alignment with operational goals and community needs, and renew, update, or discontinue those partnerships, as appropriate. The OPPD should conduct this process for each partnership on a determined timeline.
Community Engagement		
No.	**Finding**	**Recommendation**
5-10	The OPPD does not have a mechanism for proactive data sharing with the community. The OPPD also has not developed a structured approach to educate the community about police operations or procedures.	The OPPD should develop a data sharing philosophy that proactively shares data with the Village, to help inform the public, improve transparency, and build trust. The OPPD should also create educational opportunities for the Village, to improve understanding of police operations and procedures and to create public awareness.

Investigations Services		
No.	**Finding**	**Recommendation**
6-2	The process in place for reviewing criminal cases for follow-up and assignment to an investigator is inefficient and in need of adjustment.	The OPPD should revise its process for reviewing criminal cases to delegate specific tasks to appropriate personnel and to save time for investigators.
Data, Technology, and Equipment		
No.	**Finding**	**Recommendation**
8-3	The OPPD has an electronic citation program called Brazos. This system produces electronic citations, but is not currently configured to transfer data into the OPPD RMS.	The OPPD should work with its vendor to develop an interface to automatically transfer citation data from Brazos into its RMS.
Data, Technology, and Equipment		
No.	**Finding**	**Recommendation**
8-5	Crime analysts within the OPPD lack sufficient data systems knowledge or access to retrieve various data, including impartial policing data that are critical to monitoring and evaluating police operations and practices.	The OPPD should provide appropriate system access to crime analysts to access all relevant OPPD data. The OPPD should provide appropriate training to crime analysts to access, retrieve, and evaluate operational and impartial policing data.
Training and Education		
No.	**Finding**	**Recommendation**
9-1	The OPPD does not currently have a formal process for training newly promoted personnel. Transitioning from line-officer to line-supervisor requires major adjustments for most new supervisors. First-line supervisors play a critical role in the success of the organization, and their personal success is imperative. Many new supervisors do not have extensive leadership training when they are promoted, and they often lack clarity of their role.	The OPPD should develop an FST program for all new supervisors.

Recruitment, Retention, and Promotion		
No.	**Finding**	**Recommendation**
10-3	Authorized hiring levels at the OPPD do not account for attrition rates. Hiring for officers at the OPPD occurs when there are vacancies, and despite a recent increase in attrition, annual voluntary separations are generally predictable and consistent. Because of the lag-time associated with hiring and providing initial training for officers, the OPPD is constantly working without its full complement of personnel.	To maintain optimal staffing levels, hiring should always occur at the rate of allocated personnel plus the anticipated attrition rate. In collaboration with Village leaders, the OPPD should establish a minimum operational level and a new authorized hiring level (consistent with the findings of this report) that helps ensure continuity of staffing.

Chapter 1: The Policing Environment

The Policing Environment: includes an overview of the police setting, the service community, the structure of the government and police agency, personnel data, and crime and service data.

Examination of the policing environment is an essential prerequisite to informed judgment regarding policing culture, practice, policy, operations, and resource requirements. The geography, service population, economic conditions, levels and composition of crime and disorder, workload, and resources in Oak Park are salient factors that define and condition the policing requirements, response capacity, and opportunities for innovation. This chapter examines these factors.

The main purpose of any police agency is to ensure public safety within the community. This objective is accomplished primarily through the function of those in the Patrol Division. In pursuing its public safety mission, the OPPD allocates personnel to investigations and a variety of other positions and roles, which support the Patrol Division and the needs of the department and the community. For 2021, the OPPD had authorization for 118 sworn positions and 29 non-sworn positions, for a total of 147 authorized positions. There are 16 officers allocated to support patrol operations as investigators, with an additional four supervisor positions assigned to the Investigations Unit. There are 63 officers allocated to the primary responsibility of responding to CFS, with an additional 15 supervisor positions supporting patrol operations. The remaining positions within the department are allocated to specialty assignments and units.

When examining staffing levels and allocations and other organizational metrics and measures, it can be helpful to compare one organization against another to help illustrate any significant variances between them. As these types of references will be used throughout this report, it will be helpful to explain the origins of these comparative numbers. For this assessment, BerryDunn has used comparative data from a variety of sources, including the Federal Bureau of Investigation (FBI) Uniform Crime Reports (UCR) and National Incident-Based Reporting System (NIBRS), the Bureau of Justice Statistics (BJS), and from prior staffing and organizational studies and assessments conducted by BerryDunn and the International Association of Chiefs of Police (IACP). The following chapters and sections will reference *example* cities, or *study* cities. These data emanate from prior operations and management studies conducted by BerryDunn's project manager, which are publicly available and are considered to be relevant comparative data for this assessment.

Another important resource that BerryDunn references often in this report is the survey of *benchmark* cities. Several police chiefs created this annual survey in 1997 as a means to establish comparative statistics. More than 30 agencies are currently contributing data to this survey (many of which are of similar size to Oak Park), and BerryDunn finds the site valuable and informative.[2]

[2] http://www.opkansas.org/maps-and-stats/benchmark-cities-survey/

Despite the value in looking at benchmarks and metrics from other communities, it is worth mentioning that these comparisons have limitations; accordingly, BerryDunn's analysis of various organizational and operational factors relies more heavily on data specific to the agency being studied or assessed. Still, benchmark data and data from other studies help to establish context and to assess the level of agency conformance with other organizations across the industry. Accordingly, because of their strong comparative value, these sources will be referenced at various points within this report.

I. Service Population

The Village is located in Cook County, immediately west of and adjoined to Chicago.[3] The Village is approximately 5 square miles, has an estimated population around 52,000. Village population has remained consistent since 1990.[4] Although population growth itself does not directly create the need for additional police staff or resources, workloads that result from population increases can have this effect.

Table 1.1 below shows the demographic breakdown of the Village based on 2021 American Community Survey (ACS) data.

Table 1.1: Community Demographics

Community Demographics (2021)	Total	Percent
White	34,423	66.07%
African American	9,612	18.45%
American Indian and Alaska Native	147	0.28%
Asian	2,657	5.10%
Native Hawaiian or Pacific Islander	63	0.12%
Multiple Races	3,832	7.35%
Other Single Race	1,368	2.63%
Total	**52,102**	
Hispanic or Latino	4,937	9.48%
Not Hispanic or Latino	47,165	90.52%

Source: U.S. Census Bureau

This table shows that the Village's population is predominantly white, at 66.07%. Of the remaining segments of the population, 18.45% are African American, and 5.10% are of Asian

[3] SDI Figure 1.1
[4] SDI Table 1.1

descent. Table 1.1 also shows the breakdown of the Hispanic or Latino population in the Village. Although not considered a separate race, those who identify as Hispanic or Latino make up 9.48% of the population within the Village. Race and diversity are important factors as police agencies work toward hiring, recruiting, and staffing police departments that are representative of the communities they serve. Understanding community demographics can also be important in helping the department develop clarity on the need and demands for cross-cultural competency within the police force. In addition, recognizing the ethnic makeup of the community might be an important consideration in terms of the population served for whom English might be a second language.

Community demographics (including population age ranges)[5] have an influence the policing environment; however, the BerryDunn police staffing model does not rely on population as a variant for calculating staff demands. Although BerryDunn recognizes that increases in population typically result in additional workload, and these shifts are often predictable and measurable, the most important point is the level of workload that is generated by the population, not the size of the population itself. BerryDunn will expand upon this concept in other portions of this report, particularly in Chapter 4. However, the optimal staffing levels outlined in this assessment will be based on overall workload demands, project data, and the overall analysis of that data, not population totals. This type of analysis is consistent with industry standards for conducting these assessments.

II. Government and Budgets

The Village operates under a council–manager form of government. The Board president and trustees are elected to be the legislative and policy-making body for the Village. The Board appoints a Village manager who is responsible for the daily operations of the Village. The Village Board elects a president and six trustees, all of whom serve four-year terms. The chief of police, who has authority over police operations, reports directly to the Village manager.[6]

For fiscal year 2021, Village expenditures totaled $150.6M, which is a 14.41% decrease from 2017.[7] The OPPD budget increased 17.44% during this same period, going from $22.4M in 2017 to $26.3M in 2021.[8] BerryDunn did not review sufficient data to draw conclusions regarding the shifts in the budgets that have occurred at both the Village level and the police department level.

III. Police Department Staffing and Organization

A current and accurate organizational chart is an important planning tool that supports executive decisions about routine planning, resource deployment, department capacity, succession planning, professional development, emergency response, allocation of collateral duties, and

[5] SDI Table 1.2
[6] SDI Figure 1.2
[7] SDI Table 1.3
[8] SDI Table 1.4

myriad other personnel and organizational planning needs. The OPPD is broken out into two main Divisions, each supported by a deputy chief who reports to the chief of police. The Support Division includes Administrative, Investigation, Records, and Community Policing, and the Field Division includes all patrol personnel as well as several units supporting field operations.[9] [10] In addition to the two main divisions, the chief of police oversees IA and CPOC. The current organizational structure for the OPPD provides a functional distribution and grouping of duties and responsibilities and does not appear to be in need of adjustment.

Based on FBI UCR data, the number of sworn positions staffed for the OPPD was 112 in 2017, and 109 in 2019.[11] BerryDunn elaborates further on the patrol staffing numbers in Chapter 4 of this report but notes the important distinction between the number of positions staffed, as opposed to the number allocated. This is important because optimal workload models are predicated on ensuring full staffing to maximize operational efficiency. Personnel fluctuations work against operational efficiency, and it is necessary to minimize them to achieve the best results. Table 1.2 reflects the number of allocated sworn positions for the OPPD in 2021, broken out by rank and major unit of assignment.

Table 1.2: Personnel Allocations

Section	*Total Number
Executive (Chief, Assistant/Deputy Chief)	3
Mid-Rank (Below Chief - Above Sergeant)	5
Sergeants (All - Regardless of Assignment)	17
Patrol Officers (Excludes Supervisors Above)	63
Investigations (Excludes Supervisors Above)	16
Other Sworn Personnel	
Community Policing	11
Training Officer	1
Youth Officer	2
***Totals**	**118**

Source: Agency Provided Data
*Includes vacancies

[9] SDI Figure 1.3
[10] SDI Figure 1.4
[11] SDI Table 1.5

BerryDunn evaluated the OPPD personnel allocations provided in Table 1.2 as compared to industry benchmarks and several prior studies. BerryDunn observed that the OPPD allocations are comparative and reasonable, and they support operational needs.[12]

Personnel Deployments

The structured chain of command with police departments provides multiple levels of review, builds in checks on performance and conduct, provides opportunities for professional development, and creates inherent succession planning. Table 1.3 provides the allocated staffing numbers for sworn and non-sworn personnel for the OPPD.

Table 1.3: Staffing Level Allocations by Unit

	Sworn Personnel		Non-Sworn Personnel	
Section	**Supervisor**	**Officer**	**Supervisor**	**Employee**
Administration	3	1	1	2
Patrol	15	63	0	6
Investigations	4	16	0	1
Records	0	0	1	7
Property/Evidence	0	0	0	1
Community Policing	3	13	0	0
Parking Enforcement	0	0	2	8
***Sub-Totals**	**25**	**93**	**4**	**25**
Totals	**118**		**29**	

Source: Agency Provided Data
*Includes vacancies

This table provides a detailed breakdown of the allocations of staff by section, and with respect to the number of supervisory personnel in each area. This type of breakdown helps to clarify the organizational structure and span of control for the department. Although there is no hard-and-fast standard, a general rule regarding span of control is one supervisor for every five followers (those supervised by someone else), although some have suggested this ratio could be higher, at one supervisor for every eight to ten followers.[13] To a certain extent, the span-of-control number is fluid, based on the personnel being supervised and their relative capabilities. Based

[12] SDI Table 1.6
[13] http://highered.mheducation.com/sites/007241497x/student_view0/part2/chapter4/chapter_outline.html

on a review of the structure and allocation of OPPD personnel, the overall span of control for sworn the OPPD is appropriate.

IV. Crimes and Crime Rates

Within the policing industry, the UCR categories established by the FBI have been the standard for decades. Under those standards, crimes were separated into two categories: Part 1 crimes (more serious) and Part 2 crimes (all others). The crimes classified as Part 1 crimes under UCR included: murder, rape, robbery, aggravated assault, burglary, theft, motor vehicle theft, and arson. In recent years, the FBI has adopted NIBRS, a new standard for crime reporting by police agencies. The NIBRS standard includes several sub-categories and allows more intricate evaluation of certain crime data, particularly on a national scale. However, not all agencies or states have fully adopted the NIBRS standard, and many have experienced data submission errors that diminish BerryDunn's confidence in the data.

Table 1.4: Crime Rate Comparisons

Oak Park PD	Population	Total Offenses	Crimes Against Persons	Crimes Against Property	Homicide	Sex Offenses	Robbery	Aggravated Assault	Burglary	Larceny - Theft	Motor Vehicle Theft	Arson
Berwyn	54,702	713	114	599	2	30	40	42	127	421	47	4
Downers Grove	49,444	780	46	734	0	10	10	26	46	666	20	2
Glenview	47,581	455	50	405	0	5	14	31	66	307	20	12
Hoffman Estates	51,105	498	65	433	0	25	4	36	57	353	22	1
Mount Prospect	54,089	495	29	466	0	10	9	10	42	408	14	2
Oak Lawn	55,361	912	83	829	0	11	26	46	95	719	12	3
Wheaton	53,160	657	44	613	1	12	5	26	51	551	9	2
Averages	**52,206**	**644**	**62**	**583**	**0**	**15**	**15**	**31**	**69**	**489**	**21**	**4**
Oak Park PD	52,311	1,753	156	1,597	0	13	95	48	244	1,280	70	3
Study Dept. + or - Avg.	**105**	**1,109**	**94**	**1,014**	**0**	**-2**	**80**	**17**	**175**	**791**	**49**	**-1**

Source: FBI Uniform Crime Reports

Because of the difficulties in comparing crime data from different communities using both the UCR and NIBRS standards, BerryDunn has developed a process to convert NIBRS data into former UCR categories. In addition to comparison challenges, the FBI is typically 18-24 months behind in publishing national crime data. Accordingly, at the time of this report, the most current

NIBRS/UCR publication from the FBI was from 2019. The data in Table 1.4 reflect Part 1 crime data for the Village as compared to similarly-sized communities in Illinois.

When Oak Park's crime statistics are examined against all of the comparison cities, the crime totals are significantly higher than the averages. The position of Oak Park in relation to Chicago is significant, because the population and consituency of Oak Park is not limited by the geographical confines of the Village limits. Due to is proximity to Chicago, Oak Park is an active hub of the greater Chicago area. This includes various metropolitan amenities, as well as the volume of police services that tend to be associated with larger urban communities, and those that often spill over into adjacent areas. The comparatively atypical crime levels Oak Park is experiencing are likely due in part (possibly significantly) to overflow from Chicago. In short, crime knows no boundaries, and undoubtedly, Oak Park is experiencing a certain amount of crime that is filtering out of Chicago.

BerryDunn examined the number of Part 2 crimes for the Village from 2019 to 2021. Part 2 crime volume has been consistent over the three-year period and appears to reflect a typical ratio of Part 1 to Part 2 crime incidents.[14]

V. Call for Service Data

In addition to examining crime data, BerryDunn also typically evaluates non-crime service-related data. During this project, BerryDunn learned that the Village does not currently record all police-related incident contact information within the records management system (RMS). Best practices dictate that police agencies should record all police-related contacts within their data systems. Collecting this information provides for data analysis and accountability (and BerryDunn has provided a formal recommendation for this in Chapter 5). Because OPPD does not consistently record this information within its RMS, there was little value in performing an analysis of RMS data. Instead, BerryDunn examined the service data in the computer aided dispatch (CAD) system. For the dataset evaluated, BerryDunn noted 30,660 service-related incidents.[15] BerryDunn evaluates these data in detail in Chapter 4, but notes that the data reflects categories and workloads consistent with a full-service police agency.

Summary

The Village of Oak Park is located in Cook County, immediately west of and adjoined to Chicago. Oak Park is approximately 5 square miles and has an estimated population of approximately 52,000. The police department is authorized for 118 full-time sworn positions and 29 non-sworn staff, and these allocations have been fairly consistent in recent years.

The police department is separated into Support and Field Divisions, each of which is led by a deputy chief. The Support Division includes various units including Training, Records, Investigation, and Community Policing. The Field Division includes Patrol, and various

[14] SDI Table 1.7
[15] SDI Table 1.8

uniformed non-sworn personnel. The OPPD organizational structure and spans of control appear appropriate for the department.

Crime and service data reviewed by BerryDunn are consistent with an agency like the OPPD, particularly one that is positioned adjacent to a major urban area.

Recommendations

BerryDunn has no formal recommendations for this chapter.

Chapter 2: Organizational Leadership and Culture

Organizational Culture and Leadership: includes a review of organizational communication, ethics, accountability, supervision, management, and leadership philosophy.

I. Mission, Vision, Goals, and Objectives

The chief of police is responsible for the development, coordination, and implementation of the mission, core beliefs, and values for the department. These principles underpin the overall purpose of the OPPD. At BerryDunn's request, the OPPD provided a copy of its mission statement, which is outlined in OPPD Policy 2.33 and can also be found on the department's website.

> The mission of the Oak Park Police Department is to provide high-quality law enforcement services that are accessible to all members of the community. Oak Park Police officers believe in the dignity of all people and respect individual and constitutional rights. The Department follows a community-based policing philosophy that relies on citizen involvement, problem solving, ethical behavior, leadership, and the value of employees. This philosophy and its values guide interactions both within the Police Department and the community. Oak Park Police Officers work to promote quality of life by maintaining and improving peace, order, and safety through excellence in law enforcement and community service.

The OPPD mission statement properly identifies and prioritizes several aspects, including high-level service, community engagement, quality of life and community safety, and high professional standards for staff. BerryDunn observed that this mission statement is immediately visible on the department's website, centered on the first page. This positioning provides anyone who visits the website with immediate access to the department mission.

BerryDunn also asked for a copy of the department's goals and objectives and was provided with a copy of OPPD Policy 2.33. This policy does include goals and objectives, but they appear dated, as the policy has not been updated since 2007. Although the policy is outdated, BerryDunn noted two documents prominently displayed on the wall within the main patrol briefing room. Those documents outline adoptions of the Ten Shared Principles, outlined by the National Association for the Advancement of Colored People (NAACP) and adopted by the Illinois Chiefs of Police Association (ILCPA) and the OPPD, and a copy of the OPPD's Guiding Principles and Values.[16] [17] BerryDunn notes that the placement of these documents – emphasizing specific values in impartial and professional policing – are an example of a best

[16] SDI Table 2.1
[17] SDI Table 2.2

practice in reinforcing these principles for the organization. These documents are even more important given the focused attention – nationally and locally – on professional policing standards.

During the course of interviews, BerryDunn asked the OPPD staff about their knowledge of the mission, vision, values, and goals of the department, and whether staff felt that these are driving points for organizational leaders in making operational decisions. BerryDunn also asked staff whether these areas are communicated, emphasized, or reinforced within the department.

The response to BerryDunn's inquiries in this area was mixed. Virtually everyone asked expressed their belief that organizational leaders were conscious of the mission, and that the foundational factors of the mission were prominent in the decision-making process, even if they were not explicitly discussed. Some staff indicated that these concepts are formally promoted on a sporadic basis, while others suggested they are promoted less formally but more frequently through the actions of organizational leaders.

Based on the feedback provided by staff, it is evident to BerryDunn that organizational leaders have taken steps to communicate and promote the mission of the organization, and that key policy or operational decisions include the concepts noted in the mission, even if these are not explicitly noted during those conversations. Although the department has made efforts in this area, ongoing promotion of these concepts is a requisite activity in developing and maintaining a healthy and productive operational culture. BerryDunn encourages the OPPD to continue, and to increase, its formal reinforcement of these principles and ideals.

II. Accountability, Ethics, and Integrity

During interviews with staff, it was clear to BerryDunn that the OPPD strives to instill strong ethical values and the highest level of integrity in its members. Staff clearly indicated that although staff do not necessarily speak directly about ethics and accountability, these concepts are regularly practiced and reinforced. Staff also explained that they have a good Internal Affairs (IA) process, and one that is fair but not always timely; something that could be improved. With regard to community accountability, BerryDunn learned that the OPPD does not produce or release professional standards complaint data and other transparency-related data to the public. BerryDunn has provided a recommendation in Chapter 5 that addresses this issue. This may also be an area where involvement of CPOC may be advantageous.

III. Leadership Style

The BerryDunn team had an opportunity to interact with organizational leaders in various meetings and interviews. Based on the interviews, the review of various department documents and reports, and the observations of the team, BerryDunn found the leadership—at all levels within the department—competent, engaged, and concerned with making decisions that benefit the community and the organization.

Those interviewed described a pattern of leadership internally that is widely varied among supervisors, and one that is typically contingency/situationally-based. Many remarked that there is a good balance in leadership styles throughout the organization, from delegating to directing,

and that there is no singular style that is followed. Despite these responses, which were generally positive, some officers and other staff mentioned that although they have confidence in the supervisory staff, some supervisors are better than others.

BerryDunn also asked staff about the level of empowerment within the OPPD. Most of the officers and other line-level staff expressed that they feel empowered to complete their work and that they know they can get help from their supervisor if needed. The supervisors interviewed for this assessment explained that they are not typically micromanaged; they are given the right tools and sufficient leeway, and they are expected to execute the work.

BerryDunn explored with staff the level of inclusivity in the decision-making processes within the organization. When asked whether the right people are consulted regarding decisions that might affect those people, staff again provided a mixed response. Staff reported that this is a hit-or-miss issue. In certain cases, involving significant operational changes (e.g., specific policies), there may be substantial input and discussion. Some staff also indicated that some of the newer supervisors are not as accomplished in empowering others, and this was expressed as a developmental opportunity.

Generally, staff were complimentary of organizational leaders, with several directly complimenting Chief Reynolds in particular (who retired during this project). Despite these positive comments, survey responses also suggested several opportunities for improvement by OPPD leadership (see Section IX in this chapter).

21st Century Policing Assessment

Like most police agencies, the OPPD desires to provide current, relevant, professional, and best-practices public safety services to its community. The most comprehensive and meaningful publication providing guidance on policing in the modern era is the 21st Century Policing Task Force Report commissioned by then-President Obama and published in 2015.[18] The report provides six pillars for 21st Century Policing and outlines the best and most contemporary industry standards and practices and "ways of fostering strong, collaborative relationships between local law enforcement and the communities they protect."[19]

The six pillars include:

- Building Trust and Legitimacy
- Policy and Oversight
- Technology and Social Media
- Community Policing and Crime Reduction

[18] Final Report of The President's Task Force on 21st Century Policing – http://www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf
[19] https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf

- Training and Education
- Officer Wellness and Safety

BerryDunn asked command staff at the OPPD to complete a 21st Century Policing survey, designed to assess the operational alignment of the agency against the six primary pillars the Task Force identified. The survey consisted of 60 questions, separated among the six pillar areas. For each question, command staff were asked to independently assess whether the department regularly engages in practices that are consistent with the Task Force recommendation area, or whether the department inconsistently does so, or not at all. Given the average scores reflected in its self-review,[20] it is evident that there are opportunities for the OPPD to expand its alignment with 21st Century Policing standards. To maximize those opportunities, BerryDunn recommends the OPPD develop a process for pursuing, maintaining, and monitoring the department's actions in pursuit of 21st Century Policing standards.

Within the context of this survey, it is important to understand that not all of the Task Force recommendations apply equally to each agency. Further, the surveys for this portion of the study were completed independently by command staff based on their interpretation of the Task Force recommendation and their subjective assessment of the operational aspects of the agency in relation to each topical area (which for some, might be limited). Lastly, there is no specific standard or expected score for any of the pillar areas, or the overall rating. Instead, BerryDunn provides this survey as one mechanism for examining and assessing various aspects of the agency, with the intent of encouraging additional discussion and consideration in any areas in which command staff scored the agency low.

IV. Communication

Within a policing environment that includes a diversely scheduled 24/7 work force, it is critical to develop communication processes that work to ensure that all messages reach their intended target. This must be done in a timely manner, and it must provide for consistent and accurate messaging. During interviews with staff, BerryDunn inquired about various aspects of organizational communication within the OPPD. Staff reported internal communication as an operational challenge, noting that communication from command and between various units is not as effective as it could or should be. Staff also reported that communication is better with some supervisors than others, but noted that information on key decisions or operational strategies are not consistently shared with staff. Despite mentioning that it could be better, staff did not indicate substantial problems resulting from communication issues. Still, several staff identified this as an area for improvement.

BerryDunn also explored the level of comfort for staff in bringing ideas, thoughts, or critiques forward. When asked about the concept of *safety in dialogue* (which refers to the process of supervisors and followers feeling free to talk out issues openly and confidentially without fear of

[20] SDI Table 2.3

reprisal), BerryDunn received mixed responses. Some said they would feel comfortable bringing items up to a supervisor, or even the chief of police or assistant chief, without any undue concern, while others said it would depend on the issue or the supervisor. Expanding on this concept, BerryDunn asked staff whether they feel their input is valued by supervisors and/or command staff. Staff reported they felt confident that their input was important, but reiterated that it is not always sought on issues of importance or with regard to decisions that might affect them, and even when their opinions are offered, it is common that they do not hear back on a specific outcome or decision.

The desire for improved communication is a very common theme at all agencies, and because of its criticality, all agencies, including the OPPD, need to continuously focus on positive, active communication. BerryDunn recommends the OPPD collaborate with staff to develop an in internal communication strategy to improve overall department communication.

V. Management and Supervision

BerryDunn also explored the issue of supervisor accountability and reporting and asked various supervisors to describe how work performance expectations are communicated to supervisors within the department. Although supervisor duties are outlined in policy and some informal mentoring occurs, there is no formal or consistent process for outlining supervisory roles or expectations for new or promoted supervisors.

The lack of a formal process for training supervisors is not unusual; however, there is a significant need to have such a process, especially for new sergeants. For most new sergeants, the transition from line level to supervisor is very difficult, as they find themselves functioning as part of the organizational leadership for the first time.

Field Supervisor Training

Many organizations have found that developing a field supervisor training (FST) program can be helpful in bridging this gap for new sergeants. This training can include instruction on relevant policies and practices, supervisor expectations and limitations, and other information that aids sergeants in their mission. Because of the vital role they play within the organization, it is critical that new sergeants, in particular, are positioned for success, and BerryDunn recommends that the OPPD develop an FST program. The structure should be tailored to the needs of the OPPD, and customized based on the duties and responsibilities that sergeants are expected to perform. Additional details on this recommendation have been included in Chapter 9 of this report.

VI. Mentoring, Coaching, and Succession Planning

During this project BerryDunn examined mentoring and coaching opportunities and succession planning strategies within the OPPD. Staff interviewed told BerryDunn that they do not have a formal mentoring program, and the department does not have a formal policy on mentoring, nor a professional development and succession plan.

When high-potential, highly motivated employees are presented with the chance to learn, lead, and/or advance, they will take advantage of those opportunities. With this in mind, it is critical for agencies to cultivate and guide these quality employees, or the agency runs the risk of those employees becoming disenchanted or even seeking to leave the agency for other career opportunities. Currently, the OPPD does not have a formal system in place to identify these high-potential employees, or a program to cultivate them once identified.

Based on the information provided, it is evident to BerryDunn that some staff members have been mentored in a variety of ways, but the department does not have a consistent methodology for mentoring or developing staff or a policy for a formal mentoring program. In order to help staff learn, grow, and become more effective within their roles, and to prepare staff within the department for promotion to supervisory and command-level positions, the department must create an atmosphere that not only encourages personnel development, but specifically prepares staff for those opportunities through an intentional process. Accordingly, BerryDunn recommends the development of a formal mentoring program and professional development policy that supports staff in their current roles, and one that identifies and develops potential leaders, as well as those who have already been promoted who wish to advance further.

VII. Performance Appraisals

Departments typically use performance appraisals to engage staff in a process that supports the vision, mission, and values of the department. They are a means by which supervisors formally interact with staff to mentor and promote their success, as well as to identify areas where training may improve performance. Ultimately, the appraisal process should be fair and transparent, develop growth and learning, and identify problems early so that interventions can bring a problem to resolution before it becomes unmanageable. Lastly, supervisors should view performance appraisals as a helpful tool they can complete in a timely manner, not merely a perfunctory duty.

During this assessment, BerryDunn had the opportunity to examine and evaluate the performance appraisal system in use for employees with the OPPD, which was created by Village HR staff. BerryDunn reviewed the documents used in the process and had discussions with staff concerning the effectiveness of the appraisal system. Staff unilaterally indicated they felt there was limited value in the appraisal process, that the forms are too generic, feedback is not timely, and there is little follow-up on goals or personnel development.

Performance management and appraisal systems come in a wide variety of structures and formats, but the effective characteristics of such a system generally involve the following key components:

- Specific performance standards are established and communicated
- Performance is reviewed on the basis of results/output (quality, quantity, timeliness)

- Communication and feedback are provided on an ongoing basis[21]

Many organizations use performance appraisal systems to monitor past performance, but also as tools to help personnel learn, grow, and develop, whether this relates to their current role, or to future roles within the organization. When these elements are included in the performance appraisal process, the following additional components are typically included:

- Coaching
- Mentoring
- Individual development plans[22]

BerryDunn recommends that the OPPD form a committee to look more closely at the appraisal process, with the objective of revising the process so that staff have confidence in the final product. The committee should include department members and personnel from Village HR. Suggested areas for discussion as part of this process include:

- Methods to help ensure that supervisors conduct these evaluations consistently, fairly, and objectively
- Officer shift rotations, and methods to help ensure that the evaluation of each officer includes a review by each supervisor they have worked for during the evaluation period
- Systems for identifying Key Performance Areas (KPAs) for each job specialty, and a mechanism for including and evaluating these
- Goal setting and monitoring, and provisions for scheduling and documenting these interactions between the staff member and supervisor
- Monitoring of other key areas identified for the department, such as community policing or leadership, for example

BerryDunn recognizes that performance appraisal systems often receive criticism by those that must be evaluated, and that designing a system that is effective and that most staff agree with is an arduous task. Still, for the reasons stated in this section, it is critical that staff have confidence in the system; otherwise, there will be limited value in the process, and it may contribute to morale issues. Accordingly, BerryDunn recommends that the OPPD engage a collaborative process to review and/or revise the current appraisal system.

VIII. Union/Labor Management

BerryDunn explored the relationship between the leadership at the OPPD and the labor groups within the department. The consensus among the union/labor leaders regarding the relationship

[21] https://hr.uiowa.edu/faq/what-are-characteristics-effective-performance-management-program
[22] https://www.shrm.org/resourcesandtools/tools-and-samples/toolkits/pages/developingemployees.aspx

with the leadership at the OPPD was that the relationship was positive and that the relationship had improved in recent years.

BerryDunn also explored any significant concerns the unions have been experiencing. These discussions primarily involved pay and incentives for retention of personnel. These issues are not uncommon among police departments, and BerryDunn is aware they have become more critical recently, as communities and departments are struggling to maintain a workforce. Staff reported 12 grievances filed since 2020, with 9 related to leave and/or pay issues, and 3 that concerned an administrative function.[23] Based on a review of the conversations with staff and labor groups, and a categorical review of the most recent grievances, BerryDunn has no concerns over labor relationships within the OPPD.

IX. Workforce Survey

Workforce perceptions, attitudes, and expectations constitute essential information for understanding the current culture and effectiveness of any organization. This information assists in diagnosing opportunities for constructive change and managing organizational transformation. BerryDunn surveyed the OPPD workforce to capture such information and to broaden staff involvement in the study.

Survey Structure

The electronic survey offered to all staff consisted of a respondent profile (current assignment), 51 content items (opinion/perception), seven organizational climate items, and an open comments option that solicited feedback on what the department does well, what is in need of improvement, and any other comments the respondent wished to provide. The content items section elicited employee responses in ten different dimensions. Each of the dimension sections of the survey consisted of five or six forced-choice questions. At the request of BerryDunn, the OPPD distributed the survey electronically via a link provided through the OPPD email system, to every member of the agency, sworn and non-sworn, and the chief of police promoted participation. Survey protocols promoted anonymity of the respondents.

Survey Response

BerryDunn received 68 responses to the survey, out of 147 possible positions, representing a 46.26% return rate (assuming all positions were staffed, which BerryDunn is aware was not the case). Of the 68 completed responses, 55 also submitted narrative replies to at least one of the three open-ended questions. The return rates are statistically significant and indicative of the desire of staff to engage in the process of self-analysis and improvement. Additionally, there was a balanced response from command, professional staff, patrol, investigations, and specialty positions.[24]

[23] SDI Table 2.4
[24] SDI Table 2.5

Survey Analysis – Content Section

Survey results are most useful to isolate conditions and practices that need attention and/or those that offer an opportunity to advance the effectiveness of operations, achievement of outcomes, and the overall health of the workplace. For each content survey dimension, respondents chose between the following responses: never, occasionally, usually, frequently, or always. BerryDunn assigned numeric values of 1 – 5 (with 1 being low or never, and 5 being high or always) respectively. In some cases, if the question did not apply, respondents could also choose an N/A response. For each of the ten dimensions, BerryDunn calculated the weighted average of the responses. Table 2.1 provides these data.

Table 2.1: Survey Response Categories

Survey Category	Average
Leadership	2.55
Communication	2.40
Accountability and Fairness	2.66
Job Satisfaction	2.99
Training	2.24
Equipment and Technology	1.95
Patrol Staffing and Deployment	2.26
Investigations Staffing and Assignments	1.43
Community Policing/Engagement	3.05
Diversity, Equity, and Inclusion	3.55

Source: Organizational Survey

The scores for the dimensions in Table 2.1 represent the weighted aggregate score from the respondents from multiple questions within the survey. In five of the dimensions, the average response was at or below 2.5 (assessed as a pivotal threshold for responses); these categories are highlighted in light blue in the table. These numbers suggest a certain level of dissatisfaction or challenge/concern with the current condition. It is noteworthy that eight of the ten categories from the survey registered an aggregate score under 3.0. These response numbers are comparatively low in relation to prior studies. These results are also consistent with numerous other points of inquiry BerryDunn initiated, and they suggest a need for improvements to help support a healthy climate with high job satisfaction.

The Diversity, Equity, and Inclusion (DEI) score of 3.55 is comparatively high, but it also contrasts with direct conversations BerryDunn had with some OPPD staff. BerryDunn provides additional discussion and recommendations on DEI in Chapter 5.

Organizational Climate

The second portion of the survey involved an analysis of the organizational climate using specific survey questions that directly target certain operational areas. By their construction, these questions provide a different vantage point from typical quantitative questions, and a readily observable range, both in reference to how the organization currently functions and how it should ideally function based on the opinions of the respondents. These questions engage a 10-point scale, with 1 being low and 10 being high. BerryDunn has provided the response data in Table 2.2.

Because there is no correct or incorrect response, BerryDunn will not provide an analysis here with regard to any specific question or category of the information in Table 2.2. Instead, the department is encouraged to examine the responses below, and to consider what adjustments, if any, might be appropriate to respond to the desired level noted by staff who took the survey.

Table 2.2: Organizational Climate Assessment

CONFORMITY: The feeling that there are many externally imposed constraints in the organization; the degree to which members feel that there are rules, procedures, policies, and practices to which they have to conform, rather than being able to do their work as they see it.		
Conformity is very characteristic of the organization	**Current**	**7.31**
Conformity should be a characteristic of the organization	**Desired**	**5.66**
RESPONSIBILITY: Members of the organization are given personal responsibility to achieve their part of the organization's goals; the degree to which members feel that they can make decisions and solve problems without checking with supervisors each step of the way.		
There is great emphasis on personal responsibility in the organization	**Current**	**4.81**
There should be great emphasis on personal responsibility in the organization	**Desired**	**7.86**
STANDARDS: The emphasis the organization places on quality performance and outstanding production; the degree to which members feel the organization is setting challenging goals for itself and communicating those goals to its members.		
High challenging standards are set in the organization	**Current**	**3.78**
High challenging standards should be set/expected in the organization	**Desired**	**8.86**
REWARDS: The degree to which members feel that they are being recognized and rewarded for good work rather than being ignored, criticized, or punished when things go wrong.		
Members are recognized and rewarded positively within the organization	**Current**	**3.94**
Members should be recognized and rewarded positively within the organization	**Desired**	**8.83**
ORGANIZATIONAL CLARITY: The feeling among members that things are well organized and goals are clearly defined rather than being disorderly or confused.		
The organization is well organized with clearly defined goals	**Current**	**4.36**
The organization should be well organized and have clearly defined goals	**Desired**	**8.83**
WARMTH AND SUPPORT: The feeling of friendliness is a valued norm in the organization; that members trust one another and offer support to one another. The feeling that good relationships prevail in the work environment.		
Warmth and support are very characteristic of the organization	**Current**	**4.19**
Warmth and support should be very characteristic of the organization	**Desired**	**8.67**
LEADERSHIP: The willingness of organization members to accept leadership and direction from other qualified personnel. As needs for leadership arise, members feel free to take leadership roles and are rewarded for successful leadership. Leadership is based on expertise. The organization is not dominated by, or dependent on, one or two persons.		
Members accept and are rewarded for leadership based on expertise	**Current**	**5.83**
Members should accept and be rewarded for leadership based on expertise	**Desired**	**8.27**

Source: Organizational Survey

In that analysis, BerryDunn recommends the OPPD look closely at the difference between the current rating and the desired rating. A larger delta (or variance) indicates a more significant area of concern and/or need for deeper exploration.

There are three important aspects of the organizational climate survey from Table 2.2 that make this a versatile tool.

1. There is no *correct* or *right* response. The responses reflect the collective desires of the staff at the OPPD, and as such, they are representative of the current and desired culture of the OPPD, as opposed to an arbitrary standard that is set elsewhere.
2. This tool has tremendous utility. The categories in this questionnaire are clear, and the agency can easily identify, based on the responses, which areas require focused attention.
3. This tool is brief and easily replicable. The agency can re-administer this survey at various intervals and the results can help the agency recognize whether its efforts are shifting in one or more of these cultural areas and whether they are successful.

Survey Analysis – Qualitative Responses

Within the climate survey, staff were afforded the opportunity to provide open-ended feedback regarding what the department does well, what is in need of improvement, and any other comments they wanted to provide.

Unlike quantitative analysis—which can be easily broken down into numeric representations, ratios, or percentages—qualitative data can be much more difficult to present. The process of evaluating and reporting qualitative data involves looking for similarities in the data and grouping them into a manageable number (usually four to six) of overarching *themes*. Data within these themed areas may be positive, negative, neither, or both—including comments that merely make suggestions. The analysis provided here engages a contemplative process of considering each of the data elements (narrative responses) to determine within which themed area it may be most appropriately categorized, and then to consider the substance of each response in relation to the theme area and the other data within that category. Topics within each theme can certainly impact topics in other themes, and those connections, when significant, have been highlighted in this analysis.

Qualitative Response Analysis

BerryDunn received 55 separate and distinct narrative responses from this survey (in response to one or more questions). The responses included positive feedback, critical observations, and comments regarding opportunities for improvement. Not unexpectedly, responses and feedback were mixed or even conflicting. Respondents provided several specific examples of what is being done well, along with specific recommendations about how areas could be improved, and many responses were lengthy and detailed. The response rate and the detailed level of responses suggests a climate in which employees are aware of working conditions at the

department and eager to have a positive influence on efforts to enhance those working conditions and the services provided to the community.

Notably, of the 55 responses, BerryDunn observed a greater propensity to describe areas needing improvement, as opposed to providing positive feedback on operations. Although it is arguably easier to provide critical feedback, the disproportionate leaning towards critical responses could also signal an environment in which employees see significant opportunities for improvement. Despite several growth opportunity comments from staff, BerryDunn observed that the responses appeared honest, specific, and useful, and they embodied a solution-based perspective, as opposed to simply an expression of complaints.

BerryDunn conducted a thorough qualitative review of the survey responses and has summarized the responses into several primary themes, which are provided below.

Training and Professional Development

Survey respondents were both complimentary of the training the department provides and simultaneously critical of the level, amount, and quality of training. There were as many as 20 distinct and separate responses regarding training. This was among the highest response rates of any topics raised in survey responses. Responses ranged from satisfaction – and even pride in the way the department engages in training – to dissatisfaction and the need for improvement. Areas specifically mentioned in the survey included a desire for enhancements to the field training officer (FTO) program, increased mentoring opportunities, and improvements to professional development.

Professionalism, Responsiveness to Community, and Police Service

Survey respondents expressed significant satisfaction with the manner with which employees support each other, and even more satisfaction with how the department provides service to the community. There were only a few responses specifically referring to community-oriented policing (COP), problem-oriented policing (POP), or related topics such as community engagement. The most frequent responses to things the department does well (and one of the most frequent responses overall) included topics of professionalism, responsiveness to the community and its complaints, and general police service.

Technology, Facilities, and Equipment

The need to improve department facilities and equipment was a frequent response. Responses indicate the physical structure of the department – the building - needs improvement. Other specific equipment needs noted include computers, printers and copiers, furniture, and cars. Responses indicated a need for increased Information Technology (IT) support, that existing technology is not up-to-date, and that technology is not integrated well into operations.

Staffing (including recruiting, retention, scheduling, pay, and benefits)

Staffing levels and related issues were a frequently cited topic in survey responses, with at least 10 responses indicating, directly or indirectly, this was an area in need of improvement. Survey responses also frequently discussed the closely related topics of recruiting, retention,

scheduling, and pay as areas that need to be improved. A closely related topic includes numerous responses about how officers preferred a prior patrol schedule to a recently implemented one.

Internal Leadership

Survey responses indicated internal leadership is an important area for improvement. Leadership is an important, sophisticated topic that affects organizational performance and employee morale quite directly. Many components fall under the general rubric of leadership, and responses from this survey reinforced this reality. Responses about department leadership and related and supporting topics – such as vision, expectations, collaboration, recognition, support, and communication – combined to represent the single largest response topic, comprising as many as 40 different responses. Responses indicated that the department lacks clear vision and the ability to communicate clear and articulate employee expectations. Employees reported that they would like the department to reduce micromanagement, increase trust and support of employee ideas, and increase empowerment of and collaboration with internal stakeholders. Employees would like to see leadership provide more recognition of employee efforts and support for employee wellness. One of the specific comments included multiple requests to bring back the rank of Lieutenant.

Given the depth of the responses in this area, BerryDunn provides the following additional details.

- *Vision and Expectations:* Respondents reported the department may lack a unifying vision and ability to develop and impart consistent expectations for staff.
- *Communications:* Employees reported department command staff do not regularly, consistently, or actively communicate with all team members about internal or external developments. It is important to note that anytime an organization is surveyed regarding internal climate, virtually everyone indicates a need to improve communications. That is not to dismiss the importance of the results of this survey, but, rather, to reinforce how important communication is to every organization and its morale and success.
- *Support, Collaboration, Recognition, and Empowerment:* Respondents said they do not believe department leadership cultivates empowered relationships with employees and internal stakeholders deliberately. Responses indicate department leadership does not empower employees to contribute to organizational success and does not recognize them when they do. Employee empowerment is a hallmark of community-oriented policing and is a topic worthy of significant further exploration.

External Support

Survey respondents expressed concern about lack of support from Village management and elected officials. This was referenced more frequently than any other single topic, with at least 45 individual responses addressing this issue. Respondents indicated they did not feel supported by Village management and that department command staff and Village management do not enjoy productive relationships that contribute to department success.

Instead, some respondents reported a perceived adversarial relationship between department command staff and Village management.

Morale

Respondents mentioned a current state of depressed morale as an area of department performance that needs attention and improvement. This was mentioned more frequently than any other specific topic except staffing levels. Broader factors which survey responses and inference indicate as having a deleterious effect on morale include leadership and communication, facilities and equipment, staffing, training, and external support; these topics are all included in this review as individual themes.

It is important to keep in mind that morale is a broad, deep, and often obtuse concept that is affected by all of the environmental factors within and outside an organization. That is not to say it is an unimportant concern; morale is arguably the most important concern to a high-performing organization and its employees. However, morale is generally the result of other factors in an organization and not the genesis of those factors. That is, poor morale is a symptom, not a cause. Consequently, no analysis of morale would be thorough or complete without an analysis of all factors identified as contributing to current morale levels. As provided in this section, survey respondents provided numerous points of feedback to assess factors which might be contributing to morale issues.

Conclusion

The level of sincerity, detail, and sophistication included in the survey responses indicate an organization whose members care deeply about the organization and its success. Similarly, the inclusion of observations about positive aspects of the department reveal honesty and frankness about participation in the survey. This survey produced meaningful information that helps illuminate several themes that affect department performance, including both positive attributes, areas for improvement, and areas that combine some aspects of both. Respondents also provided specific observations and suggestions that can contribute to a meaningful overall agency assessment and assist in the production of effective recommendations for performance enhancement.

Summary

Leaders within the OPPD have demonstrated a commitment to ensuring that the department is operating in an efficient and effective manner, in furtherance of the public safety mission for the organization in serving the community. Although the OPPD has an appropriate mission statement, goals, and objectives within its policies, the department would benefit from updating these on a consistent basis and developing a formal strategic plan around them.

The OPPD is a professional organization that prides itself in being ethical and in holding itself and staff members accountable to the community and to each other.

The OPPD leadership does not engage a singular operational style, but instead uses a variety of styles that are situationally-based, taking into account the individual and task at hand. Many

staff feel empowered to do their work but have indicated a desire for more inclusivity in operational discussions and decisions that will affect them.

The OPPD desires to provide an approach to law enforcement that is highly consistent with industry best practices and the components of 21st Century Policing; however, there are areas within the six pillars that would benefit from additional focused attention.

As with many other police departments, one area where the OPPD could improve pertains to communication. Although the OPPD has traditionally used a variety of methods to help ensure robust internal communication, some staff indicate this could be better.

One primary area of focus for the OPPD involves the need for mentoring, coaching, and developing staff. BerryDunn recommends the OPPD vigorously pursue a staff development plan and a mentoring program.

Although the OPPD has an appraisal system, some staff indicate discontent with the current system, suggesting it is too generic and falls short of providing the details and structure required to ensure goal development, progress, and monitoring. Although criticism over appraisal systems is common, some improvements might be helpful, particularly if these are done in conjunction with developing and implementing a mentoring program and a personnel development plan. BerryDunn recommends the OPPD work collaboratively with department and Village HR staff to develop proposed revisions to the appraisal system.

Through the organizational climate and culture survey, staff identified a number of areas they feel require some attention. Organizational leaders should use this information as a prompt for action to better understand why staff feel this way and to guide internal discussion and decision-making to mitigate any staff concerns. Despite these noted areas, staff were highly complementary of department leaders and co-workers, and demonstrated a desire for professionalism and a high level of service to the community.

Recommendations

This section provides the three formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 2.3: Chapter 2 Recommendations

Organizational Leadership and Culture		
No.	**Internal Communication**	**Overall Priority**
Chapter 2 Section: IV Communication		
2-1	**Finding:** In its current state, internal communication within the OPPD is not fully serving the needs of the organization.	
	Recommendation: The OPPD should develop an internal communication strategy. The OPPD should conduct a series of internal discussions to determine how to improve communications. These discussions should focus on current gaps in practice and establishing ongoing formal mechanisms to overcome any identified gaps.	

Organizational Leadership and Culture		
No.	**Personnel Development Plan**	**Overall Priority**
Chapter 2, Section VI: Mentoring, Coaching, and Succession Planning		
2-2	**Finding:** OPPD does not have a formal staff development system that includes systems or mechanisms for consistent coaching, mentoring, or succession planning.	
	Recommendation: BerryDunn recommends OPPD develop a formal coaching, mentoring, and succession planning program for staff and that the program be memorialized in policy and executed consistently in practice. In order to help ensure success within each operational role and to prepare those within the department for formal supervisory and command-level positions and/or informal leadership opportunities, the department must create an atmosphere that encourages personnel development and also one that specifically prepares staff for opportunities through a deliberate and intentional process.	

Organizational Leadership and Culture		
No.	**Performance Appraisals**	**Overall Priority**
Chapter 2, Section VII: Performance Appraisals		
2-3	**Finding:** The current performance evaluation system is generic and is considered marginally useful at all levels of the OPPD organization.	

Organizational Leadership and Culture		
No.	**Performance Appraisals**	**Overall Priority**
	Recommendation: The OPPD should engage a collaborative process to evaluate the current performance appraisal system in use, to develop a system that will more closely conform to the needs and desires of the leadership and staff within the department. It is imperative that staff have some level of confidence in the appraisal system in use; otherwise, staff will find little value in going through the process, and it will become simply a perfunctory duty. To help ensure that the system in use in Oak Park is valued and worthwhile, BerryDunn recommends that the OPPD engage a collaborative process, including representatives from HR, to design a system that will better suit the needs of the staff and the organization.	

Chapter 3: Operations and Staffing

Operations and Staffing: includes an analysis of the organizational structure, policing philosophy, support services and specialty assignments, and organizational relationships.

The structure of the OPPD is similar to the majority of the police departments across the United States, in that it follows a hierarchical chain of command.[25] As noted previously, the department is split into two main divisions: Support and Field, each of which is led by a deputy chief who reports to the chief of police.

I. Organizational Structure

There are any factors to consider in assessing whether the structure of the organization is appropriate and effective. At a minimum, a thorough review of the organizational structure would include the following areas:

1. Spans of control
2. Authority and oversight
3. Grouping of similar duties and responsibilities
4. Functional utility

Because there are a number of significant details and considerations that accompany a detailed review of the organizational structure of a police department, there can also be many possible solutions. This also means there is no standardized or prescriptive design. What is most important is whether the structure is serving its purpose and working for the agency. Based on BerryDunn's review and considering the above criteria, the OPPD organizational structure is functional, meets operational needs, and conforms to industry expectations and standards.

II. Policing Philosophy and Operations

One component of this assessment includes an analysis of the policing philosophy and the prioritized focus of the organization. This is significant because the BerryDunn staffing model includes substantial discretionary time, which functions best in an environment predisposed to promoting community policing. BerryDunn heard from staff that community policing is an important aspect of the operational philosophy of the department; this was conveyed both in the kickoff meeting with the command staff and in the interviews conducted with various staff members. Chapter 5 of this report explores and expands upon these issues. In short, various recommendations in this report intend to support a community-policing operational philosophy and the ability of staff to carry out that function.

[25] SDI Figure 1.3

Despite the expression of community policing as an overarching philosophy and organizational commitment, BerryDunn observed an apparent disconnect between this philosophy and how it translates into an operational perspective, particularly within the Patrol Division. BerryDunn noted that during interviews with patrol, there was very little mention of community collaboration or the development of relationships with community members in furtherance of the public safety mission (except through referrals to the COP Unit, and specifically the NBOs and RBOs).

For many in patrol, however, it is not merely a question of whether they agree with or understand the COP philosophy—the more pressing issue is how they can find the time to be more proactive in this area. It is evident to BerryDunn that staffing and personnel deployment issues have contributed to difficulties for patrol officers in successfully engaging in meaningful community policing activities on a consistent basis. However, if adjustments are made to staffing and personnel deployments, patrol staff should be afforded more time to perform this vital aspect of work. So, although the department has stressed the importance of community policing throughout the organization, there is work to be done to help ensure that these philosophies filter into daily practice within patrol in a more thoughtful, intentional, and meaningful manner.

In conversations with staff, BerryDunn discussed the use of data within the organization. Based on various interviews, reports, and other data reviewed by BerryDunn, it is evident the department has access to various crime and personnel data. However, BerryDunn saw limited evidence that these data were being put to optimal use from an operational perspective. BerryDunn is aware that the OPPD is committed to and working toward developing an operational focus that is more data-driven. Of course, this requires not only the gathering of pertinent data, but also the personnel and capacity to analyze these data. BerryDunn explores this area further in Chapter 8 of this report.

III. Support Services, Specialty Programs, and Assignments

This section describes the various units and programs within the OPPD that provide the resources for officers to do their job and meet the demands of the public. This section will briefly overview the operational divisions and sections that exist for the purpose of supporting the core mission of effectively policing the Village. Much of the information from this section was provided directly from the command staff within the OPPD. Although BerryDunn mentions them briefly in this section, several areas are addressed in detail later in this report. Those areas include the following:

- Uniformed Patrol (Chapter 4: Patrol Services)
- Investigations (Chapter 6: Investigations Services)
- Crime Analysis (Chapter 8: Data, Technology, and Equipment)
- Training (Chapter 9: Training and Education)
- Recruiting and Hiring (Chapter 10: Recruitment, Retention, and Promotion)

- Professional Standards/Internal Affairs (Chapter 11: Internal Affairs)

Office of the Chief

The Office of the Chief includes the chief of police, two deputy chiefs, one non-sworn commander, one executive secretary, and two part-time police chaplains. The chief of police has functional oversight over the entire department, and direct oversight over IA, CPOC, and the police chaplains. There are no noted staffing needs for this operational area of the department.

Internal Affairs/Professional Standards

There is one full-time non-sworn staff member assigned to IA. This person provides administrative, analytical, and technical support to the chief of police, and is responsible for managing the office of professional standards (IA).

Support Division

The Support Division includes Administrative, Investigation, Records, and Community Policing Sections.

Community Policing

The purpose of the Community Policing Section is to work to develop, implement, and maintain programs to enhance the department's COP philosophy. The primary units within this section include resident beat officers (RBOs)/neighborhood relations officers (NROs), foot patrol, youth investigations, and the emotional support K-9. Staffing for the COP Section includes 12 full-time sworn personnel and one K-9.

RBOs/NROs

Primary COP services are delivered through a dedicated officer assigned to one of the eight patrol zones that cover the Village. Assigned personnel can be an officer who actually lives in the zone (RBO), or an officer who does not live in the Village but is assigned to a particular zone (NRO). Currently there are only six of the eight authorized positions filled, which requires two officers to cover two zones each. RBO/NRO duties and assignments are the same. These officers regularly engage in problem orientated policing (POP) to directly address the needs of residents within the assigned zone. This includes special traffic operations, school safety programs, residential/business security assessments, directed mission-orientated patrols, and follow-up investigations on chronic issues within the zone. The officers can also be utilized for special events as needed. RBOs/NROs work varied shifts and are also expected to lead and attend monthly zone meetings.

There are no noted staffing needs for this operational area of the department, however, the RBO/NRO program represents a best practice COP/POP strategy, and BerryDunn encourages the OPPD to fully staff these positions as they are able.

Foot Patrol

There are currently three officers assigned to foot patrol beats. Two of the officers cover downtown Oak Park, and one officer covers the Hemmingway district (area just north/east of main shopping district). The mission of these officers is to maintain a high-visibility presence in the business area and to develop working relationships with the businesses. Additionally, officers often act as an ambassador between the Village and its citizens and visitors. Many times, this includes interaction with the unhoused, and individuals who may be suffering from mental illness.

There are no noted staffing needs for this operational area of the department. BerryDunn again notes this as a best practice personnel deployment and had a first-hand opportunity to observe foot patrol officers of the OPPD interacting positively with the community.

Youth Investigator

There is one full-time sworn youth investigator who works with the schools and is assigned many youth-related investigations (including school-related or family sex incidents). This officer performs a dual role, engaging in COP activity and criminal investigations.

Emotional Support K-9

The OPPD has a K-9, named Pawficer Howie, who is available for officer wellness as well as being ready to engage in positive community interactions at any time. Pawficer Howie resides at the police department.

Administrative

This section is led by a non-sworn administrative commander and includes one sworn officer and 11 non-sworn staff members. Staff in this section generally work business hours, Monday through Friday. Significant units within this section include the Budget and Revenue Analyst, Evidence and Detention Custodian, the Training Coordinator, and Records.

The commander over this section has indicated that various new requirements from the state related to body-worn cameras (BWC) and the associated training requirements will create an administrative burden requiring additional staff. The commander has suggested the addition of an administrative support sergeant to oversee the BWC program and to supervise and implement training required by the state. BerryDunn observes that the Administrative Section has only the commander and one records supervisor, but no other supervisory personnel. Adding an administrative supervisor to oversee the BWC program and the other units within this section would help improve spans of control, and also support growing operational demands. It is not clear whether this position would need to be sworn. Unless there is a legal demand for a sworn officer in this role, BerryDunn suggests adding this position as a non-sworn staff member.

Budget and Revenue Analyst

This position is responsible for all finance-related tasks in the department, including, but not limited to, budgeting, payroll, accounts payable, accounts receivable, and grants. Additionally,

this position provides support for ongoing projects within the department.

Evidence and Detention Custodian

The responsibilities for this position include maintaining the control and custody of evidence and in-custody property, responsible for general supervision of property control procedures, functional operations of the detention facility, building maintenance functions and other ancillary functions as assigned, and serving as the liaison between the police department and the state police forensic laboratory.

Training Coordinator

This position is responsible for administering the operation of the Training function.

Records

The Records Unit is responsible for certain programming which is designed to meet the informational needs of the department, including processing of all warrants and related activities associated with the police recordkeeping process. It also maintains and stores all records relating to police activities, including those records dealing with the court system.

The current allocation and classification of personnel in the Records Unit includes one records supervisor, two senior records clerks, three records clerks, one court liaison, and one parking advocate. These classifications confine personnel to specific job duties, which eliminates cross-categorical work by staff (see SDI Appendix C). This limits effectiveness, and, at times, causes work to back up. The OPPD would benefit from merging the records clerk, court liaison, and parking advocate positions. Although staff may be assigned specific tasks or roles on a daily or semi-permanent basis, this merge would allow for cross-training and cross-categorical work as workloads dictate.

Field Division

The Field Division includes all patrol personnel as well as several units supporting field operations, including parking enforcement, animal control, and community service officers (CSOs).

Parking Enforcement

This unit is allocated one non-sworn parking enforcement supervisor, and five non-sworn parking enforcement officers who are responsible for enforcing all parking regulations within the Village. Parking enforcement officers work varied shifts, including evening and overnight shifts. This unit used to operate independently from the police department in the past but is now part of the OPPD structure.

During interviews, staff informed BerryDunn that this unit used to have as many as 15 staff, but that number has dwindled to its current size. Staff also suggested the need to add one supervisor and two additional parking enforcement officers to the evening shift.

Parking enforcement, by its nature, is generally a discretionary activity. Although there can be myriad important reasons to enforce parking laws (e.g., blocking intersections or loading zones, parking next to a fire hydrant, snow removal or street cleaning needs, or time-limited parking for businesses), for most communities, parking enforcement is not a demand- or workload-based activity. Instead, staffing needs for parking enforcement are typically based on the level of effort a community wishes to dedicate to this activity. Accordingly, BerryDunn does not have a formal recommendation regarding staffing for parking enforcement but leaves this decision to up to the appropriate jurisdiction to consider.

Similarly, the placement of parking enforcement within the hierarchical structure of government operations is up to the discretion of the jurisdiction as well. BerryDunn does note, however, that as an enforcement activity, there is a natural nexus between parking enforcement and the police department. Additionally, because the police department typically has supervisors working 24/7, this can reduce the need for unit-specific supervisors for the parking enforcement unit.

Animal Control

The Village has allocated one non-sworn position to Animal Control, which falls under the supervision of the Health Department. At the time this report was being written, the position was vacant.

During interviews with staff, BerryDunn learned that in many cases, the person assigned to these duties was not available, which required sworn officers to manage this function. In the next section, BerryDunn recommends expansion of the CSO unit. Expansion of the CSO Unit could capture a significant workload not requiring a sworn officer, and BerryDunn recommends adding Animal Control to that function, and reallocating this full-time equivalent (FTE) position to the CSO Unit.

Community Service Officers

The purpose of the CSO Unit is to perform a variety of public service, customer service, and law-enforcement-related duties and responsibilities that do not require the services of a sworn police officer. CSOs are also tasked with performing a variety of administrative duties in the police department, including working the front desk and monitoring the temporary holding facilities. This unit is allocated six positions and covers operations on a 24/7 basis. The staffing model to this unit includes one CSO assigned to the office and one CSO assigned to the field. Due to staffing levels, field shifts are not always filled.

As part of this project, BerryDunn conducted an Essential CFS Evaluation. The results of this process are detailed in Chapter 4, and the entire report is provided in Appendix B. Within that report, there are numerous CFS categories that could be diverted to CSO, many of which would translate into direct workload reductions for sworn staff.

Although the OPPD allocates six positions to the CSO Unit, consistently staffing two shifts per day (one in the office and one in the field) would require 10 CSO positions. BerryDunn recommends the OPPD expand the CSO Unit to this level. Depending upon the volume that can be diverted to CSOs, it is possible that unit staffing may need to increase. BerryDunn

recommends consideration of total staffing for this unit as part of the overall Alternative CFS plan the OPPD develops.

Evidence Collection

The OPPD currently uses specially-certified sworn personnel to collect all evidence for criminal cases, regardless of the type of evidence and/or significance of the case. The OPPD can significantly improve efficiency by only using certified evidence technicians for complex evidence collection and serious criminal cases, and deferring evidence collection for minor cases to other resources.

A more effective option for the OPPD includes training all sworn personnel on basic evidence collection (e.g., taking photos, collecting simple latent prints, bagging and tagging specific evidence items for processing) and/or training CSOs to perform this function, supported by sworn staff or evidence technicians. This would eliminate the need for evidence technicians to regularly leave their patrol district to collect basic evidence. If all officers were trained on basic evidence collection, this would also create efficiency so they are not required to wait for the arrival of certified evidence technicians. Additionally, the OPPD could use other trained staff (CSOs or sworn officers) to assist certified crime scene technicians on more serious cases. BerryDunn recommends the OPPD adjust its evidence collection processes, preserving the use of certified evidence technicians for only serious crimes, and relying on officers and/or CSOs for minor case evidence collection.

IV. Stakeholder Relationships

As part of this assessment, BerryDunn explored the various stakeholder relationships that affect the operation of the OPPD, to include intra-agency (internal units and sections), interagency (other departments), and external stakeholders (professional partners).

Intra-Agency Relationships

During interviews, OPPD staff described internal operations and relationships between units positively, and BerryDunn found no evidence to suggest a pattern of internal conflict between units other than a desire for better communication between the patrol and investigations units. Staff reported this as notable, not a problem, but did express a desire for improvement. BerryDunn notes that this is a commonality within police organizations and recommends that the OPPD consider inter-unit communication as an important aspect of the overall communications strategy within the department.

Interagency Relationships

When asked, OPPD staff interviewed described relationships with area law enforcement as generally positive, including various partnerships on a variety of operational levels. Those interviewed noted they work most commonly with the River Forest and Forest Park police departments, noting that although they sometimes encounter the Chicago police department, they are not on the same radio bank and work more commonly with the smaller neighboring agencies. Staff did not describe any interagency conflicts.

Professional Partners

Within the context of this report, the term *professional partners* refers to other agencies the OPPD interacts with on a regular basis, which might include law enforcement agencies or other organizations such as social services, prosecutors, probation, advocates, mental health organizations, hospitals, and the medical examiner. At the request of BerryDunn, the OPPD convened a group of professional partners to engage in a group discussion concerning the working relationships and interactions between those interested groups and the OPPD.

The discussion with these groups was largely positive regarding procedures, practices, and relationships with the OPPD and its personnel. All professional partners had positive things to say about the OPPD and the relationships between the police department and their organizations. It was evident to BerryDunn that the OPPD strives to maintain positive relationships with these professional partners, and that the OPPD has been responsive to their needs.

Formal Partners

During interviews with staff, BerryDunn learned the OPPD has traditionally had several agreements in place, formal or otherwise, in which the OPPD partners with various law enforcement agencies and other non-governmental agencies in the area. Although these relationships and partnerships are important, all departmental efforts—internal or external, individual or collaborative—should support clearly defined and assessed departmental goals, objectives, and performance measures, and comply with department policies and procedures. The best way to do this with external partnerships is through clearly articulated and mutually-developed foundational documents, such as memorandums of understanding (MOUs), intergovernmental agreements (IGAs), and other contracts and documents with partners.

Every MOU or IGA should document the purpose of the partnership, how the partnership and each agency's participation will support the partnership's purpose, how the partnership's policies and procedures ensure consistency with department policy and procedure and include clear and regularly updated performance measures for the partnership and department participants. MOUs and IGAs should be dated and time-limited to require regular review and updates that help ensure the agreements stay consistent with current department policies, goals, and objectives.

Going forward, BerryDunn suggests the OPPD evaluate all partnerships with area law enforcement and other non-governmental agencies and put in place (or renew) an appropriate and updated MOU or IGA, consistent with the points and structure recommended in this section. During this process, the OPPD should also consider whether such partnerships should be continued, modified, or abandoned, based on a careful review of the needs, goals, and objectives of the OPPD and the Village.

V. Accreditation

Accreditation is a process through which police organizations are evaluated against a set of established criteria that represent typical, standardized, and expected procedures, protocols, policies, and practices of law enforcement agencies. Accreditation provides law enforcement agencies with an opportunity to regularly assess themselves, gauge their conformity with industry standards, and receive feedback that helps prioritize needed changes and improvements for the agencies.

Although accreditation is helpful and beneficial to an organization, it can be an expensive and time-consuming process to maintain this status. Because of these factors, many agencies do not pursue formal accreditation, or they do so on a revolving cycle, as opposed to making it an annual requirement. Upon inquiry, BerryDunn was told that the OPPD is not an accredited agency. Staff explained that the OPPD had sought accreditation through the commission on accreditation for law enforcement agencies (CALEA), widely considered the premiere standard for the industry, but that due to the state of the police facility, they were unable to pass the CALEA standards.

BerryDunn assessed the OPPD facility as part of this project and noted numerous shortcomings, which are outlined in Chapter 8. Given these observations, it is not surprising that the OPPD facility impeded CALEA certification, and BerryDunn has made a recommendation in Chapter 8 regarding upgrading the OPPD's facilities.

Despite the limitations of its facility, seeking accreditation can be valuable. Accreditation can help ensure the department is keeping up with industry trends, and that critical operational areas are regularly reviewed and monitored. However, achieving and maintaining accreditation can require the efforts of a full-time person, particularly in an agency the size of the OPPD. If the OPPD decides to seek CALEA accreditation, it will be necessary to allocate appropriate resources to achieve this goal.

VI. Communications Center

The OPPD uses the West Suburban Consolidated Dispatch Center (WSCDC) as its primary public safety answering point (PSAP). The WSCDC dispatches police, emergency medical services (EMS), and fire resources for the communities of Forest Park, Oak Park, and River Forest.

BerryDunn asked OPPD staff about interactions with WSCDC and was told that other than some minor issues (which are common between police departments and communications centers), the relationship was generally positive. Staff explained that it is not typical for WSCDC to hold calls, but that if there are calls pending, they will notify a street supervisor for direction. Staff also explained they did not feel over-response (officers self-dispatching to CFS) was an issue, and that supervisors monitor this.

BerryDunn asked about the use of automatic vehicle location (AVL) in dispatching high-priority CFS, and was told that the OPPD and communication center are not equipped to use AVL.

One area that can delay officer response is the amount of time between when the CFS is received at the PSAP by the dispatcher, and the time in which the CFS was dispatched to an officer; this is referred to as lag time. Based on a review of the OPPD data in CAD, there are essentially only three priority dispatch codes used by the WSCDC for the OPPD; P, 1, and 2. BerryDunn evaluated lag times for each priority level and determined they were within common standards.[26]

Alternative Response

Many police agencies use alternative CFS response processes, such as Telephone Reporting Units (TRU) and online reporting. The OPPD does not have a TRU or online reporting. BerryDunn discusses alternative CFS response in greater detail in Chapter 4, and recommends developing these offerings. As a part of that process, BerryDunn suggests that the OPPD work with the WSCDS to develop protocols to encourage callers to consider these alternatives, where appropriate.

Summary

The OPPD is organized in a hierarchical fashion, similar and consistent with other law enforcement agencies. The OPPD has two primary Divisions, Field and Support, which are broken into many sub-units. The OPPD organizational structure is sufficiently supporting operational needs at this time.

The OPPD uses several professional staff to support department operations and the multiple units within the organization. Based on increasing needs for administrative personnel, BerryDunn is recommending the addition of one position to the Administrative Section of the Support Division.

The OPPD has a variety of specialty units that serve various department and community needs. The RBO/NRO program is a particularly notable unit and is a best-practice example of COP and POP.

Although the OPPD promotes COP, this has been an operational challenge for patrol personnel, who are burdened with CFS volume and the associated activities. During this project, BerryDunn observed opportunities for the OPPD to civilianize positions and to reduce workloads for sworn staff. These adjustments will not only reduce work burdens on patrol but also can provide fiscal relief, because non-sworn staff are generally less expensive to hire than sworn staff.

BerryDunn observes that the Records Unit has multiple job descriptions and positions, which do not overlap. This structure impedes efficient operations and should be consolidated into a single set of job duties.

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[26] SDI Table 3.1

BerryDunn also noted that the OPPD could benefit from diverting certain CFS to CSOs, which would relieve a portion of the workload from patrol. BerryDunn provides additional recommendations on this in Chapter 4.

The OPPD has traditionally had various partnerships with outside law enforcement agencies and other non-governmental organizations and enjoys strong relationships and a collaborative approach to policing with its partners. However, the OPPD would benefit from evaluating each such relationship and any governing MOUs or IGAs, to help ensure consistency with the goals, objectives, policies, and procedures of the OPPD and the Village of Oak Park. In cases where there is no documentation, the OPPD should develop MOUs or IGAs in collaboration with its partners.

Recommendations

This section provides the three formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 3.1: Chapter 3 Recommendations

Operations and Staffing		
No.	**Administrative Supervisor**	**Overall Priority**
Chapter 3, Section III: Support Services, Specialty Programs, and Assignments		
3-1	**Finding:** Unfunded mandates by the State of Illinois have created an operational burden for the OPPD in managing BWC data and facilitating the BWC program, including all required training. The Administrative Section has one commander, and one records supervisor, but no other supervisory personnel overseeing the remaining units or personnel.	
	Recommendation: The OPPD should add an administrative supervisor to the Administrative Section to support operations. This supervisor should oversee the BWC program, and the other units within the Administrative Section, other than records.	

Operations and Staffing		
No.	**Use of Non-Sworn Personnel**	**Overall Priority**
Chapter 3, Section III: Support Services, Specialty Programs, and Assignments		
3-2	**Finding:** The OPPD can gain operational efficiency and reduce costs by utilizing non-sworn personnel more effectively.	
	Recommendation: The OPPD should review its use of CSOs, internally and in the field, and expand their duties and responsibilities. In addition, the OPPD	

Operations and Staffing		
	should revise the job descriptions and duties for records staff to allow for cross-category work. The OPPD currently uses CSOs as desk officers and in the field when they are available. The effectiveness of field use, however, has been limited due to too few personnel. Adding CSOs (as recommended elsewhere in this report) would allow the OPPD to consistently staff field positions and create an opportunity to relieve sworn staff of certain duties (e.g., collecting video for incidents, taking photographs, managing animal control, handling minor CFS) that do not require a sworn officer. Staffing for the CSO unit should be increased to a minimum of 10, but may require additional expansion, if the Alternative CFS plan produces sufficient demand.	

Operations and Staffing		
No.	**Evidence Collection**	**Overall Priority**
Chapter 3, Section III: Support Services, Specialty Programs, and Assignments		
3-3	**Finding:** Evidence collection efforts used by the OPPD that rely on specific sworn personnel are not efficient.	
	Recommendation: The OPPD should adjust its evidence collection processes to improve operational efficiency. Using specially trained sworn personnel for all evidence collection – particularly for minor cases – is an inefficient use of sworn officer time. Most criminal cases do not require a certified technician, and with minimal training, these duties can be reallocated to those conducting the preliminary investigation, and/or to CSOs.	

Chapter 4: Patrol Services

Patrol Services: includes an analysis of patrol staffing, patrol work schedule and personnel deployments, and response to calls for service.

The purpose of the OPPD's Patrol Section is to identify and hold criminals accountable, reduce crime, reduce the fear of crime, and to use proactive problem-solving methods in conjunction with the community members of Oak Park. This is accomplished through active patrol, traffic enforcement, driving under the influence (DUI) enforcement, criminal investigations, evidence/crime scene processing, and drug enforcement. The Patrol Section responds to emergency and non-emergency CFS. When not responding to these calls, officers in this section use non-obligated time to actively patrol their designated zones within the community. This section of the report provides substantive details concerning the structure of the Patrol Section, along with data and analysis regarding workloads and personnel deployments.

I. District/Sectors and Personnel Deployment

The authorized staffing levels for the Patrol Section include 63 officers, 12 sergeants, and 3 commanders.[27] BerryDunn notes that the workload and staffing model for Patrol relies upon calculating the actual time available for those officers who routinely respond to CFS. For the OPPD, this includes only those at the officer rank who are assigned to patrol duties.

Although Table 1.2 identifies 118 allocated sworn positions, and these numbers have shifted during the project, at the time this report was being drafted, the OPPD was short approximately 20 sworn officer positions. Although these position vacancies occur in various operational sections within the department (other than Patrol), lack of these resources can negatively affect Patrol workloads.

The OPPD separates the Village into eight geographical patrol zones.[28] The geography of the Village can be an important factor in understanding staffing demands and personnel allocations. As noted previously, the land area of Oak Park is roughly 5 square miles. If the patrol zones were distributed equally in terms of geography, the average size would be approximately .5 square miles; however, the patrol zones for the OPPD vary in size and population.[29] Despite these variations, staff expressed to BerryDunn that the zone structure is functional.

Staffing levels within police departments are always in flux, as are position assignments and unit allocations. BerryDunn notes that *authorized* staffing levels are not the same as *actual* staffing levels. This is important because the workload calculations BerryDunn use in this report (particularly in this section) rely on full staffing of the allocated positions. If one or more positions

[27] SDI Table 4.1
[28] SDI Figure 4.1
[29] SDI Table 4.11

were vacant, these workload obligation calculations would increase in ratio to the number of vacant positions.

The OPPD uses staggered start times for the dayshift, afternoon (power) shift, and nightshift.[30] These staggers help ensure that staff are available during major shift changes. The nature and structure of the 10-hour patrol shift is designed to respond to peaks and valleys in CFS distribution, and the structure is generally effective in this respect. BerryDunn will examine coverage and schedule issues more thoroughly later in this chapter.

II. Patrol Call Load and Distribution of Calls for Service

BerryDunn examines workload data in several places throughout this report; most notably, those that relate to Patrol/Field staffing requirements and follow-up investigations demand. BerryDunn uses CFS as a primary means to calculate obligated workload within the Patrol Section. CFS data are also critical in analyzing timeliness of police response, geographic demands for service, and scheduling and personnel allocations. For analysis purposes, BerryDunn will provide numerous tables and figures that outline various aspects related to CFS.

Table 4.1 shows an abridged list of allocated work captured in CAD for fiscal year (FY) 2021-2022.[31]

Table 4.1: Patrol and Supplemental Patrol Unit Hours – Abridged FY 21-22

Unit	Hours on Call		
Patrol	**Community**	**Officer**	**Total**
Patrol	22759:17:46	6301:05:51	29060:23:37
Sub-Total	**22759:17:46**	**6301:05:51**	**29060:23:37**
Supplemental Patrol	**Community**	**Officer**	**Total**
Sub-Total	**3755:27:29**	**3218:18:27**	**6973:45:56**
Investigations	**Community**	**Officer**	**Total**
Sub-Total	**1333:36:45**	**1526:39:22**	**2860:16:07**
Non-Patrol	**Community**	**Officer**	**Total**
Subtotal	**1717:05:03**	**141:38:06**	**1858:43:09**
Grand Total	**29565:27:03**	**11187:41:46**	**40753:08:49**

Source: Police Department CAD Data

[30] SDI Table 4.2
[31] SDI Table 4.3

There are two important aspects of Table 4.1 to highlight. First, BerryDunn has separated the workload provided in this table into categories that indicate Patrol, Supplemental Patrol, Investigations, and Non-Patrol, and it is important to understand the distinction between the different categories shown. Patrol refers to those officers who routinely are responsible for handling CFS. Supplemental Patrol refers to those officers who support the Patrol function and who might occasionally answer CFS, but for whom CFS response is not a primary responsibility. Investigations volume is generally related to non-CFS activities, and Non-Patrol includes work volume that refers to officers who are not responding to CFS. Although Non-Patrol information relates to work performed by the OPPD, it is not considered part of the primary CFS workload, and determining this value is a critical element in exercising the BerryDunn workload calculation formula. Second, the totals in Table 4.1 include both community- and officer-initiated activity. This is noteworthy because the BerryDunn workload model categorically separates these CFS and relies on obligated workload that emanates primarily from community-initiated calls.

Because of the timing of this report, BerryDunn utilized a FY approach to the CFS workload analysis. The period used was July 1, 2021, through June 30, 2022. BerryDunn also notes that the data in Table 4.1 is an abridged version of the CAD data from FY 21-22 (the full version of this data is provided in SDI Table 4.1). Work effort by Patrol represents approximately 23,000 hours of the approximately 30,000 hours of community-initiated activity shown in Table 4.1. Although other units support the Patrol officers and engage in a certain amount of community-initiated CFS, it is evident that Patrol officers are responsible for the bulk of the obligated time associated with community-initiated CFS.

Arguably, some of the CFS responses allocated in the Patrol category might not relate to CFS that are part of the Patrol obligation, and there are likely CFS that were handled by secondary Supplemental Patrol units, which do relate to primary CFS workload. Similarly, some of the CFS responses within the Non-Patrol category might be in support of a call that Patrol handled. However, without a case-by-case breakdown, it is not possible to be certain of these numbers. Despite the potential for variances in the data, BerryDunn is confident that these allocations and our subsequent calculations accurately reflect the total obligated Patrol response demands, and that the variations that might exist within the categories would not significantly affect the categorical totals or the calculations used by BerryDunn to determine staffing levels.

Methodology

The BerryDunn project team obtained a comprehensive CAD dataset from the OPPD for FY 21-22. The dataset contained more than 86,000 line entries. The CAD data related to 52,724 incidents, reflecting 40,753 hours of work effort. This total number of hours reflected the actual workload hours recorded within CAD, but there were three primary issues inflating these numbers, specifically as they related to obligated patrol workload. First, numerous data did not appear to represent primary response to CFS within Patrol. These data belonged to various specialty units with the department, including CSOs, Animal Control, Criminal Investigators, and Parking Officers, to name a few. As part of the analysis process, BerryDunn separated and removed these data.

The second issue involved officer-initiated, as opposed to community-initiated, activity. As noted above, the BerryDunn workload model relies upon a separation of these activities, and accordingly, it was necessary to split these data as part of the analysis. The total number of obligated community-initiated workload hours in the Patrol category was approximately 22,759. The number of officer-initiated workload hours for Patrol was approximately 6,301. Again, these data were split apart from the obligated workload total for Patrol.

The third issue relates to the data within CAD that is not part of the obligated workload for the Patrol officers. These data include both community- and officer-initiated data, which is reflected in Table 4.1 in the Supplemental Patrol and Non-Patrol unit categories. As part of the analysis process, BerryDunn separates these data so that only the obligated workload data remains, and this number is used for calculating Patrol staffing needs. Table 4.5 in this chapter illustrates the mathematical calculations BerryDunn used to determine the final workload obligation totals.

As is typical in these types of studies, there were challenges and limitations within the CAD dataset that the OPPD provided to BerryDunn. Despite these limitations, BerryDunn processed the dataset and accounted for these difficulties as part of the overall analysis of the CAD data. To be clear, BerryDunn is confident that the workload data and calculations presented provide a reasonable representation of the volume of obligated work that the Patrol Section must manage. Additionally, it is common for CAD datasets to include challenges and variations in the data. BerryDunn also has significant experience in accounting for these variances and in cleaning the CAD database so the data can be used for the required calculations. BerryDunn exercised this experience and applied a proven methodology to prepare the data for final analysis.

As part of this assessment, BerryDunn asked the OPPD Patrol officers to complete a worksheet and survey related to CFS they handled during two of their work shifts (BerryDunn did not identify which shifts to record). Based on the self-reported survey provided, Patrol officers reported an average of .81 narrative reports per shift, with the average report-writing duration of approximately 50.70 minutes.[32] Note that the time per report is in addition to the on-scene time for each CFS. In prior studies, BerryDunn has found that agencies average approximately 2 narrative reports per shift with an average report writing time of 35 minutes. The self-reported data from the OPPD reflecting the number of reports per shift is slightly lower to the prior study averages; however, the time per report for the OPPD is slightly higher.

Within the same survey, officers reported data related to their workload and type of activity. The data reported from the 53 responses indicate that in total, officers handled 264 CFS, with an average of 5 CFS per shift, each averaging 39.87 minutes.[33] This self-reported data does not include report-writing time, but only the on-scene time associated with handling the CFS, including backup responses. BerryDunn notes that based on several prior studies, the average self-reported number of CFS handled per shift was eight, with an average CFS duration of 39.50

[32] SDI Table 4.4
[33] SDI Table 4.5

minutes. The amount of time per CFS for the OPPD is similar to the prior study averages, although the number of CFS per shift at the OPPD is lower than prior study averages. BerryDunn elaborates further on average CFS times later in this chapter, including comparisons to other agencies studied.

BerryDunn also examined the average time per incident for various CFS dispositions within CAD.[34] Incidents that included a written report averaged approximately 57 minutes, with the overall average per incident of approximately 28 minutes. The per-incident durations are consistent with the self-reported data and with expectations for report incidents, as opposed to non-report incidents.

Report Processing and Review

During interviews with staff, BerryDunn inquired about the process involved in writing police reports and the review of those reports. The following briefly summarizes the steps in this process.

When an officer receives a report about a crime, when they make an arrest, or when the uniqueness or circumstances of an incident are noteworthy, the officer will generate an incident report. The life cycle of an incident report follows this sequence:

- An officer generates an incident report (whether for an arrest, initial narrative, or follow-up).
- The report is routed to a supervisor who approves it or returns it to the officer for additional work.
- Supervisors typically approve reports from the team they supervise, and supervisors are also responsible for verifying proper NIBRS coding by officers.
- Generally, once the report is approved by the supervisor (reports can be returned to officers for revision), the review process is complete.
- Records staff will review the report and perform any cleanup.
- Once the report is finalized, Records will close the incident, and if it is a criminal matter, forward it to Investigations.

Although this process is logical on the surface, there are opportunities for improvement. BerryDunn expands this conversation later in this chapter; however, cases cannot be forwarded to Investigation until after Records has reviewed and cleared them, and all criminal cases are being routed to Investigation for review, regardless of their potential for being solved. Additionally, supervisors are not diligently ensuring the accuracy of NIBRS coding on reports

[34] SDI Table 4.6

being advanced to Records, which is creating additional unnecessary workloads for Records staff.

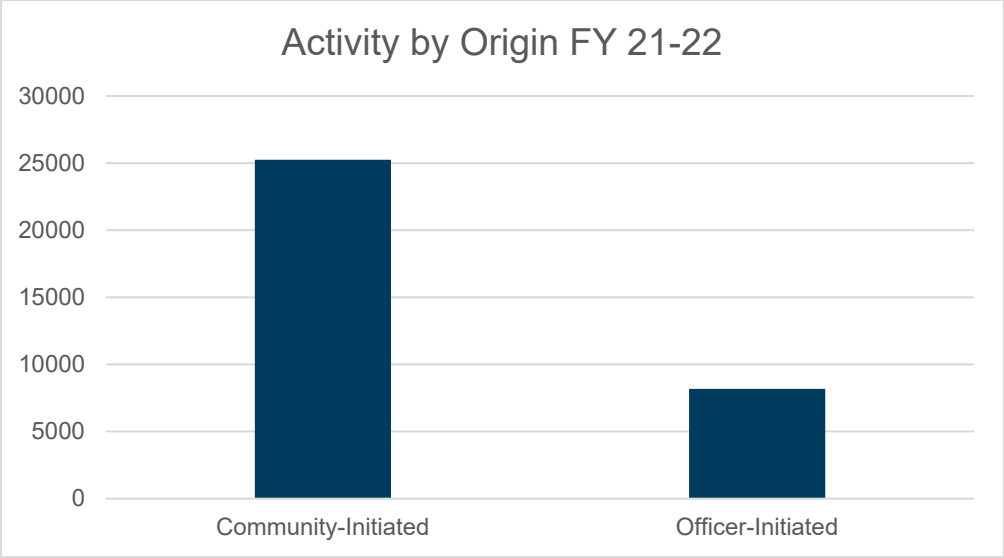
III. Calls for Service Analysis

In this section, BerryDunn will examine the data related to the response to CFS by the OPPD, both community- and officer-initiated, and provide a detailed analysis of this information.

CFS response represents the core function of policing and responding to community complaints and concerns is one of the key measures of effective policing in every community. Leaders can also use data related to CFS to measure the confidence and reliance the public has on their police department. Figure 4.1 includes a graphical depiction of community- and officer-initiated activity within the Village for FY 21-22. Based on the data in Figure 4.1, 76% of Patrol officer volume related to community-initiated activity in FY 21-22, while 24% related to officer-initiated activity.

In several recent studies, the average percentage of community-initiated activity was 63.24%, but the range from these studies was from 40.77% to 78.27%. Based on the data from Figure 4.1, the OPPD is on the high side of this range. There can be various explanations as to why the ratio of community- to officer-initiated activity varies so significantly; however, BerryDunn has determined that one of the key factors that drives these differences relates to staffing issues and the amount of time officers have available to conduct self-initiated work.

Figure 4.1: Community vs. Officer-Initiated CFS



Source: Police Department CAD Data (patrol officers and patrol sergeants only)

Based on the CAD data reviewed, six CFS types make up more than 35% of all CFS time for Patrol. Those CFS types include domestic disturbance/assault, theft, disturbance/disorderly conduct, suspicious vehicle/person/condition, fire department assist, assist the public, and

welfare checks.[35] The most common six incidents by volume include alarms, suspicious person/vehicle/condition, assist the public, disturbance/disorderly conduct, motor vehicle crashes, and welfare checks.[36] BerryDunn notes that much of this volume could be diverted to other resources, freeing up obligated workloads for Patrol staff. BerryDunn elaborates further on alternative CFS response later in this chapter.

To aid in analyzing the CAD data, BerryDunn separated the data into categories including crime, service, and traffic (including motor vehicle crashes). BerryDunn split the data further into workloads that involve community-oriented CFS versus officer-initiated activity. Based on data BerryDunn reviewed, the largest volume of community-initiated CFS is service-related, comprising 49.75% of all CFS. However, criminal incidents take up the most time and consume 46.78% of overall time for Patrol officers.[37]

In Table 4.2, BerryDunn has provided a breakdown of the percentage of distribution of CFS by activity category, the percentage of time allocated to each activity category, and the average number of minutes per CFS for each activity category. Data in Table 4.2 reflects only Patrol and Patrol sergeant efforts. Based on the data analyzed, the OPPD spends an average of 76.53 minutes per criminal incident and 69.27 minutes for traffic incidents.

Table 4.2: Time Per Call for Service – Comparisons FY 21-22

Oak Park			
Category	**% of Total Calls**	**% of Call Time**	**Minutes/CFS**
Crime	35.62%	46.78%	76.53
Service	49.74%	35.82%	41.97
Traffic	14.64%	17.40%	69.27

*Prior Study Averages			
Category	**% of Total Calls**	**% of Call Time**	**Minutes/CFS**
Crime	39.74%	47.33%	47.38
Service	46.43%	38.54%	33.67
Traffic	13.83%	14.13%	48.07
Grand Total	100.00%	100.00%	47.37

Source: Police Department CAD Data (patrol officers and patrol sergeants only)

[35] SDI Table 4.7
[36] SDI Table 4.8
[37] SDI Table 4.9

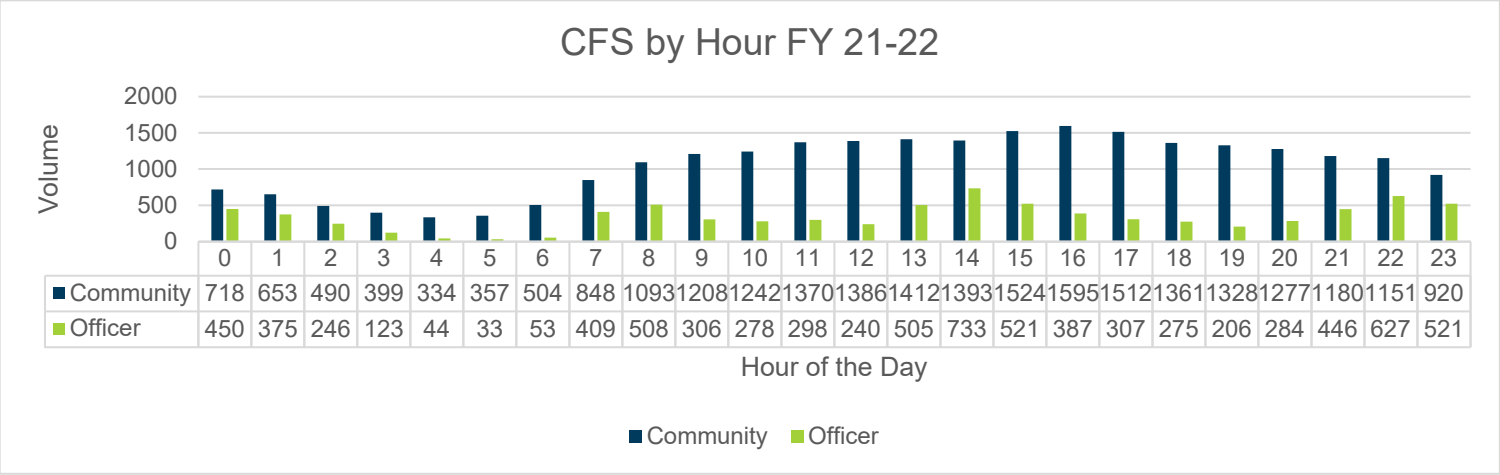
Table 4.2 also provides important comparison data from other studies. The volume and percentage of time on criminal incidents for the OPPD is similar to the study averages, but the average on-scene time for criminal incidents for the OPPD is 61.52% higher than the other studies. Similarly, the volume and percentage of time per CFS for traffic incidents for the OPPD is comparable to the prior studies, but average on-scene traffic times for the OPPD are 44.10% higher than the prior studies, significantly so for service incidents. Although there may be multiple factors affecting these variations for the OPPD, it is likely that serious crime issues and high traffic crash rates are contributing to these numbers.

Examining the cyclical pattern of CFS, whether by month, day of the week, or hour, is an important consideration in helping departments in allocate resources efficiently in response to these patterns. To analyze the cyclical patterns of obligated work volumes, BerryDunn split and examined these data from several perspectives. When looking at the data by month,[38] or by day of the week,[39] BerryDunn noted that the variations are not significant enough to warrant adjustments to patrol staffing deployments on a monthly basis.

Figure 4.2 shows the distribution of CFS by hour of the day, including both community-initiated CFS and officer-initiated activities. This figure shows a familiar pattern of activity that BerryDunn has observed in numerous other studies. Based on this table, community-initiated CFS peak around 4 p.m. and dip to their lowest total around 4 a.m. The pattern in Figure 4.2 is important because workload volumes are far greater at the high workload volume point as opposed to the low point. These variations are significant, and they require a work schedule that is distributed appropriately to manage these variations.

[38] SDI Figure 4.2
[39] SDI Figure 4.3

Figure 4.2: Call Volume by Hour of the Day



	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Community	718	653	490	399	334	357	504	848	1093	1208	1242	1370	1386	1412	1393	1524	1595	1512	1361	1328	1277	1180	1151	920
Officer	450	375	246	123	44	33	53	409	508	306	278	298	240	505	733	521	387	307	275	206	284	446	627	521

Source: Police Department CAD Data (patrol officers and patrol sergeants only)

BerryDunn elaborates on the OPPD Patrol schedule later in this chapter; however, the OPPD generally uses a similar staffing allocation across all hours of the day,[40] and the Patrol schedule would benefit from adjustment in response to the peak CFS demands shown in Figure 4.2.

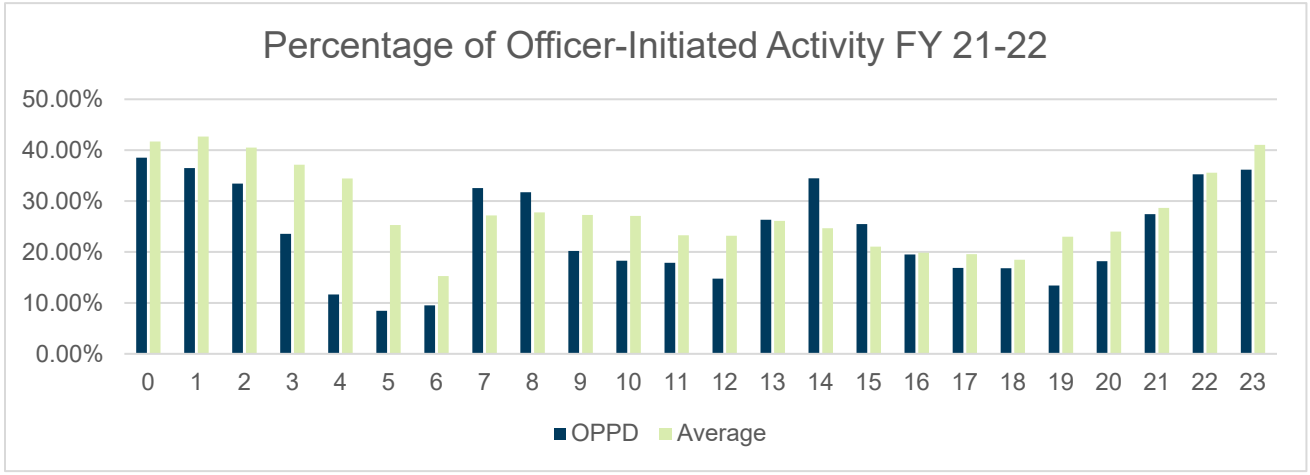
In looking at Figure 4.2, the level of officer-initiated activity for the OPPD is comparatively low. Based on CAD data, the OPPD had 8,175 officer-initiated activities recorded in FY 21-22.[41] Based on data provided to BerryDunn, the OPPD staffed 9,478 shifts in 2021.[42] Using this total, on average, each Patrol officer only conducted .86 officer-initiated activities per shift. Figure 4.3 shows officer-initiated example data from a prior study in comparison to the data from the OPPD.

The light green bar in Figure 4.3 is an example of a more typical officer-initiated pattern from other studies. The data in this table show the volume of officer-initiated activity as a percentage of the overall volume of activity for that hour. The example reflects a shifting percentage of officer-initiated activity, which corresponds to lower community-initiated CFS volumes (as shown in Figure 4.2).

[40] SDI Table 4.13
[41] SDI Table 4.9
[42] SDI Figure 4.5

For the OPPD, the percentages of officer-initiated activity are comparatively low (except during shift overlaps). The officer-initiated activity volumes provide evidence of substantial workloads, which might be impeding officers from having sufficient time to engage in self-initiated work.

Figure 4.3: Percentage of Officer-Initiated Activity



Source: Police Department CAD Data (patrol officers and patrol sergeants only)

In addition to looking at CFS by month, day, and hour, BerryDunn also examined the distribution percentage of CFS volume by shift blocks throughout the day.[43] BerryDunn looked at these data in three segments: 0600 – 1600; 1300 – 2300; and 2000 – 0600. BerryDunn used these time frames because they most closely resemble the shift hours used by the OPPD. Of these three blocks, the 1300 – 2300 block has the highest volume, involving 54.38% of the workload. The highest volume within a 10-hour block occurs between 1100 – 2100, representing 56.06% of the volume. In addition to providing this analysis, BerryDunn has also calculated the OPPD volume in eight-hour increments across the day. These data show that 82.68% of all CFS volume occurs between 0700 and 2300 (7 a.m. and 11 p.m.) This is a typical distribution of CFS activity.

[43] SDI Table 4.10

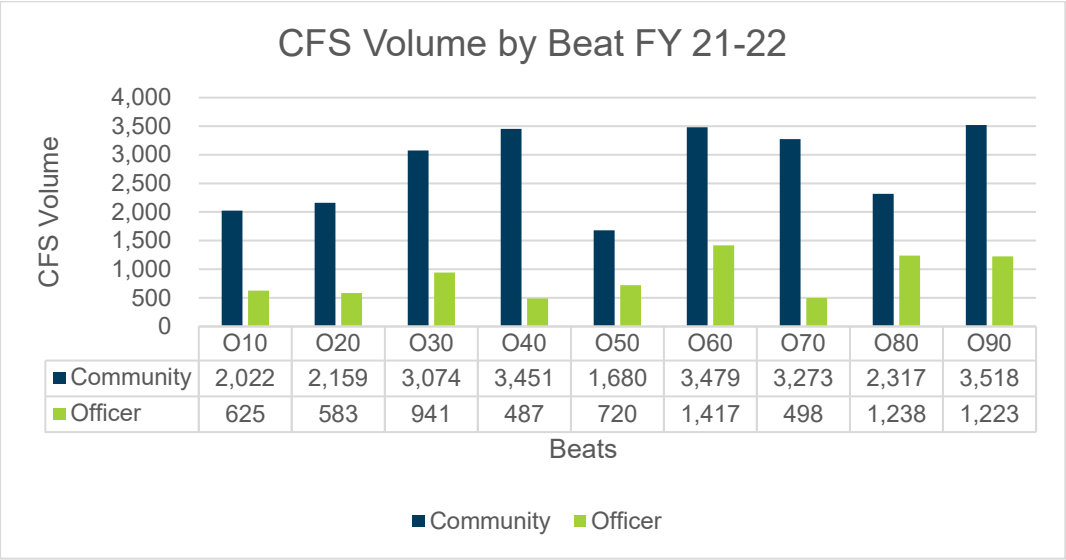
One of the reasons for analyzing CFS volumes by month, day of the week, or hour of the day is to look for patterns that the department can use to analyze personnel allocations and staffing, in hopes of more efficiently deploying personnel during the times when the most activity is occurring. Although BerryDunn favors this type of analysis and acknowledges it is a significant aspect of work schedule design, the volume of activity is not the sole factor to be considered in terms of scheduling personnel. Based strictly on the percentage of CFS across the day, one might consider scheduling only 17.32% of the Patrol staff from 2300 and 0700. However, CFS that occur at night often involve some of the most dangerous activities that the police must deal with, and most of these incidents require multiple personnel.

Essentially, patrol work schedule design and personnel deployments must include consideration of various operational aspects to help ensure the workforce is staffed at all hours of the day and is equipped to manage the workload and type of work they will encounter.

Although the OPPD uses eight patrol zones, the zones are distributed across nine beats, some of which overlap with more than one patrol zone. Figure 4.4 provides a breakdown of the total volume of community- and officer-initiated volume by patrol beat. As Figure 4.4 shows, the CFS for each of the beats can vary substantially. Of the nine beats, six have annual volumes exceeding 3,000 CFS, or 8 CFS per beat per day on average. Two of the remaining beats have annual volumes over 2,000 CFS per year, with the last beat having a volume of approximately 1,700 CFS. As mentioned previously, the size of the patrol zones – and beats – vary, ranging from .25 square miles to 1.1 square miles in size.[44] In evaluating these data, BerryDunn notes there is no clear correlation between patrol beat size and volume.

[44] SDI Table 4.11

Figure 4.4: CFS Volume by Beat



	O10	O20	O30	O40	O50	O60	O70	O80	O90
Community	2,022	2,159	3,074	3,451	1,680	3,479	3,273	2,317	3,518
Officer	625	583	941	487	720	1,417	498	1,238	1,223

Source: Police Department CAD Data (patrol officers and patrol sergeants only; primary grids)

BerryDunn also examined CFS distribution within the beats based on hourly volumes. These volumes vary greatly across the beats and hours of the day,[45] and all of these data should be evaluated as part of personnel deployments, to help ensure appropriate staffing is allocated in alignment with CFS demands.

As is typical with many police departments, the Patrol schedule for the OPPD uses an overscheduling feature, which, in theory, provides additional staff who can be allocated in high-volume areas. BerryDunn will provide additional details and work schedule analysis later in this chapter, but based on numerous data provided and reviewed by BerryDunn, it is evident that the patrol schedule in use by the OPPD does not respond well to peak CFS volumes. Although there are some overlaps at shift change around mid-day and mid-evening, the hourly allocation of personnel by the OPPD generally involves a maximum deployment of 11 officers per shift.[46]

Given this number, the OPPD might expect to have 33 officers working per day (11 officers over each of three shifts). However, this represents the *maximum* number of personnel scheduled by hour. In reality, the OPPD averages 26 officers per day across the calendar.[47] Daily shift minimums for the OPPD are eight, which corresponds to the number of patrol zones. So, although maximum daily staffing is set at 11, BerryDunn learned through interviews and data analysis that, due to staffing shortages, the OPPD regularly operates at shift minimums.

There are several key analysis points when considering personnel deployments for Patrol units. These include the volume of activity; type of activity; number of available personnel; geographic

[45] SDI Table 4.12
[46] SDI Table 4.13
[47] SDI Figure 4.5

patrol boundaries and natural or man-made barriers; traffic patterns; and variations in CFS volume based on month, day of the week, and time of day. One of the more common ways to evaluate personnel deployments, particularly as they relate to community-initiated CFS demands, is to examine CFS response times. Although there are no specific national standards regarding response times, common Priority 1 response times (generally life-threatening and in-progress events) typically range between four and seven minutes. The next level of priority CFS, which generally involve immediate response needs but those that do not fall into the Priority 1 category, range from roughly eight to 12 minutes.

BerryDunn examined the overall OPPD response times by priority,[48] and as broken out by beat and priority.[49] None of the response times by the OPPD—by beat or priority—were outside of acceptable response standards. In Table 4.3, BerryDunn has provided comparisons of response times from several prior studies, which includes comparisons of Priority 1 and 2 CFS, and all remaining priorities. Response times for the OPPD are in line with national standards, and with the comparison studies reflected in Table 4.3.

Table 4.3: CFS Response Times in Minutes – Comparisons (OPPD FY 21-22)

Comparisons	Priority 1	Priority 2	All Priorities
Prior Studies - Under 100 Officers	0:03:12	0:04:11	0:08:16
Prior Studies - 100 + Officers	0:06:37	0:12:09	0:15:39
Oak Park Police Department	0:04:39	0:05:41	0:04:43
Total Average	0:06:14	0:11:16	0:14:54

Source: Police Department CAD Data; data from prior studies

Although the response times examined by BerryDunn reflect favorably for the OPPD, it is important to put these into context. Typical response times analysis considers the average time it took for the first OPPD unit to arrive on a CFS after being dispatched. They do not account for the lag time that occurs from the point receipt of the CFS at the communications center until it is dispatched, and they do not quantify the time community members were waiting for their phone call to be answered, or the length of time they were on hold. BerryDunn evaluated the wait time for CFS from point of receipt to the CFS being dispatched[50] and found these were in line with appropriate standards. However, BerryDunn did not obtain or review the data that reflects the time the phone started ringing at dispatch until the CFS was answered at the communications center.

Another metric that BerryDunn routinely examines is how often a Patrol unit assigned to one district/zone must leave that district/zone to take a CFS in another area due to staffing or

[48] SDI Table 4.14
[49] SDI Table 4.15
[50] SDI Table 3.1

because the officer in that zone is unavailable for some reason. When an officer responds to a CFS within his or her zone, the officer is able to return to their Patrol duties immediately after they clear the CFS. Although BerryDunn understands that out-of-zone response will likely always be an operational need at some level, another important consideration is how this contributes to staffing issues.

When an officer must respond out-of-zone to a CFS, three things can happen. First, when an officer leaves his or her zone to take a CFS and another CFS occurs in the original zone, another officer must leave his or her zone to take it. This creates a cascading effect, which ultimately affects multiple officers/zones. Second, because of return time, a portion of the time for the officer who responds out of zone is lost time; this is significant. In short, out-of-zone response is inefficient, and it results in a loss of precious staffing resources. Third, out-of-zone response often elongates overall response times because officers often respond to a CFS in their assigned zone while returning from another zone.

BerryDunn determined that out of 25,211 incidents in which a comparison could be made, there were 13,299 primary officer out-of-zone responses (meaning the officer assigned to the beat did not handle the CFS), involving 1,029 hours of response time.[51] Because return time is generally equal to response time, that means 1,029 hours were essentially lost, due to out-of-zone response; this is equivalent to roughly 2 full-time officer positions. More importantly, the time officers spend out of their assigned zone works against geographic policing standards, which seek to encourage community relationships within designated patrol areas.

In examining response times for both in- vs. out-of-zone responses, BerryDunn observed that response averages were similar for both, and both were lower than prior study comparisons.[52] Essentially, CFS response times are reasonable, whether in- or out-of-zone; however, there is a significant amount of out-of-zone response occurring.

District/Beat Discussion

The above section includes various references to patrol zones. Like many departments, the OPPD uses zone boundaries for the deployment of personnel, and this strategy is one that helps ensure that staff are dispersed throughout the community to aid in rapid response to CFS. BerryDunn supports the use of zone structures in this regard, but when used properly and more intentionally, these systems can also contribute to community-policing strategies for the officers, the agency, and the community.

Geographic policing is a term used to describe a proactive, decentralized approach that is designed to reduce crime, disorder, and fear of crime by intensively involving the same officer in the same area of the community on a long-term basis so that community members develop trust, thereby enhancing cooperation with police officers. Geographic policing also encourages

[51] SDI Table 4.16
[52] SDI Table 4.17

the assignment of police officers to defined geographic boundaries on a permanent basis to work directly with community members to resolve problems (the OPPD uses NROs and RBOs in a similar manner). It is a strategy designed to make individual police officers responsible for the community's policing needs in a defined geographical area, with a service customized to each individual locality, ensuring the policing needs of local areas are met.

One of Sir Robert Peel's principles (regarded as the founder of modern policing) is: "The police, at all times, should maintain a relationship with the public that gives reality to the historic tradition that the police are the public and the public are the police."[53] Geographic deployment plans fulfill this principle, enhance customer service, and facilitate more contact between police and community members, thus establishing a strong relationship and mutual accountability. Geographic policing also implies a shift within the department that grants greater autonomy to line officers, which implies enhanced respect for their judgment as police professionals. Accordingly, BerryDunn recommends a strategy for the OPPD that supports a consistent zone assignment structure.

Cover Cars

Part of the data analysis BerryDunn conducted included looking at the amount of time spent on each call by the primary unit and the cumulative amount of time spent on the call by additional units. For FY 21-22, the OPPD logged 26,042 distinct CFS, with an additional 28,190 backup responses across those events.[54] Based on these numbers, 48.02% of the data in CAD related to primary officers, and 51.98% was for backup response. If backup were distributed equally across the CFS, then these numbers would indicate that each CFS averages 1.08 backup units. However, backup does not occur equally across all CFS, and many CFS for the OPPD have multiple unit responses.

BerryDunn also examined the average on-scene time for the primary units, the average cumulative on-scene time for backup (which may include multiple units per CFS), and the total average CFS time. In looking at these times, BerryDunn notes that backup accounts for 54.38% of the total CFS time.[55] In comparing this data against prior studies, BerryDunn noted that the OPPD has one of the lowest primary unit response percentages, and accordingly, one of the highest backup unit percentages.[56] The range of the percentage of primary response to CFS from the comparison studies is from 46% to 72%, and the range of backup response is from 28% to 54%. The average from these studies is 58% primary response to 42% backup. The OPPD is on the far end of each average.

[53] https://www.durham.police.uk/About-Us/Documents/Peels_Principles_Of_Law_Enforcement.pdf
[54] SDI Table 4.18
[55] SDI Table 4.19
[56] SDI Table 4.20

To expand the multi-unit analysis, BerryDunn examined the breakdown of the CFS types that included an average of at least two units responding to each incident.[57] In keeping with contemporary policing standards, multiple responses of three or more units are typically limited to calls of a serious nature. BerryDunn observed that of the categories listed with high unit responses, all appear to be serious enough to warrant the response of multiple personnel. It is also worth mentioning that the unit counts BerryDunn evaluated reflect average responses by CFS type. This means the number of responding units was higher or lower than the reported value in some cases.

BerryDunn also wishes to point out that based on available staffing for the OPPD, there is typically only one officer working within a zone. If staffing levels are at the minimum and more than one officer responds to any CFS, any additional responding officers would have to do so from another zone, leaving that zone short (or vacant) in terms of allocated staff. As mentioned previously, this can create a cascading affect, which forces personnel into a pattern of out-of-zone response.

Looking at all of the backup data provided in the tables mentioned, the number of backup units in ratio to CFS is comparatively high, as is the ratio of backup time from the total number of officers assisting on CFS. BerryDunn noted 25 CFS categories that averaged four or more responding units.[58] These elevated numbers may represent a certain amount of over-response by the OPPD, particularly in some of the lower-level CFS types. They may also be affected by the nature of the CFS the OPPD is managing.

As a point of clarification: BerryDunn is firm in its position that officer safety is of paramount importance. Nothing in this section should be construed to suggest that BerryDunn supports limiting unit responses to CFS in a manner that would jeopardize the safety of the officer or the public, or in a way that would interfere with the effective and efficient delivery of police services.

IV. Patrol Staffing Analysis and Calculations

BerryDunn determines Patrol staffing requirements by evaluating the total workload in hours against hours of officer availability. Officers are not able to work for a variety of reasons, including days off, vacation, sick leave, holiday time, and training obligations. To define staffing needs, deploy officers properly, and evaluate productivity, it is necessary to calculate the actual amount of time officers are available to work. To assist in these calculations, BerryDunn obtained detailed Patrol officer leave data for 2021 from the OPPD.

Patrol Availability

Table 4.4 demonstrates the amount of time Patrol officers have available for shift work. This table starts with the assumption that officers work a 40-hour work week. This computation is 52

[57] SDI Table 4.21
[58] SDI Table 4.21

weeks x 40 hours = 2,080 hours per year. Table 4.4 shows that after subtracting leave categories from the total, the average patrol officer is actually available to work 1,613 hours per year (rounded down), not 2,080 hours as is often thought (understanding that this represents the cumulative average—and individual officer availability can vary greatly).

The data in Table 4.4 also reflect average leave times by category from several prior studies. The overall leave totals for the OPPD are roughly 67 hours higher than the comparisons (resulting in less available time). This is a significant number and one that BerryDunn verified with the OPPD, due to its importance.

Table 4.4: Patrol Availability

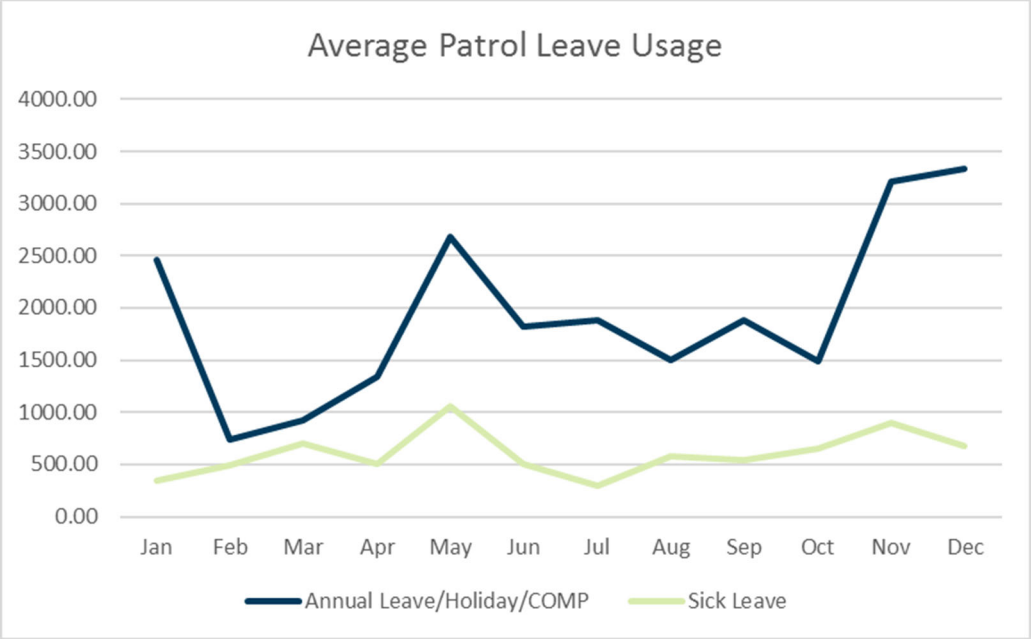
Annual Paid Hours	2080	*Study Averages
Leave Category		
Annual Leave/Vacation	157.58	148
Sick Leave	53.49	44
COMP Time Off	33.4	13
Holiday Time Off	107.81	97
FMLA Leave	0	12
Military Leave	32.91	
Leave Without Pay	0	
Injury Leave	47.01	
COVID-19	2.76	
PEDA	4.72	
TTD	3.97	
Admin Leave	1.21	
Training	22.00	63
Sub-Total (minus)	466.86	
Average Annual Availability (Hours)	1613.14	1,680

Source: Police Department Data

In Table 4.5 later in this chapter, BerryDunn provides a staffing analysis that leverages the data from this table. Understanding the actual amount of work time available for officers is central to building a work schedule and for ensuring that adequate shift coverage is attained in relation to CFS needs. It is also a critical component in calculating staffing demands based on an examination of workload against worker capacity.

In addition to understanding how much time officers have available to them for scheduling purposes, it is also important to understand when they are not available, because peaks and valleys in the use of leave time can complicate the process of maintaining coverage within the work schedule. In Figure 4.5 below, the patterns of annual leave for patrol officers are broken down by month.

Figure 4.5: Annual Leave Hours – Patrol



Source: Police Department Provided Data

This figure shows that several months have annual leave time totals that are significantly higher or lower than the other months. Due to these variations, the work schedule should have the flexibility to be adjusted to these patterns so that staffing resources are used efficiently.

Shift Relief Factor

Another mechanism for understanding the number of officers required to staff a schedule is through determining the *shift relief factor.* The shift relief factor is the number of officers required to staff one shift position every day of the year. Based on the number of available hours for OPPD patrol officers (1,613) and the length of the shifts (10 hours), the shift relief factor for the OPPD is 2.27.[59] Because the current scheduling model for the OPPD includes shift minimums of eight officers for the dayshift, eight officers for the middle shift, and eight officers for the nightshift, for a minimum total of 24 daily shifts,[60] then the number of officers required to staff

[59] SDI Table 4.22
[60] SDI Table 4.2

the current schedule and allocation of personnel without operating short or using overtime is 59 (2.27 x 24).

This calculation represents the number of personnel needed to staff the current stated shift minimums. However, if the OPPD used its desired staff allocations as a baseline (33 shifts), then these numbers would change greatly. If the OPPD wanted to maintain scheduling numbers based on the preferred allocations, then the number of officers required would be 75 (2.27 x 33).[61]

Understanding the various issues related to staffing, including the shift relief factor, is important from a scheduling standpoint. Police agencies tend to build their work schedules based on the total number of personnel available, as opposed to the workload capacity of those personnel. The result is an imbalance between the structure of the schedule and the number of hours officers can actually work. Schedules of this nature also typically fail to account for leave patterns and peaks and valleys in service demands. However, these issues can be overcome through the use of a properly-designed work schedule (assuming adequate staffing is available). To determine the proper number of officers required for patrol, agencies must first consider how many positions they want to staff at any given time (this should be based on workload demands). Once the department determines this number, it can calculate personnel needs.

Using the available CAD data, BerryDunn calculated the number of minutes required per day to manage the patrol workload. The available minutes per day, by officer, are calculated based on a 30% availability of time to dedicate to the obligated workload, based on a 10-hour shift (10 hours x 60 minutes, multiplied by 30% = 180 minutes). Based on these data, the OPPD would require 24 officers per day to manage the patrol volume.[62]

Given the calculations provided, the OPPD should be able to cover the workload with 24 daily shifts, or with an allocation of 59 patrol officers (when factoring in shift relief; 2.27 x 24 shifts). However, these calculations presume an equal distribution of CFS by location, hour, day, and month. To more accurately understand the staffing needs of the OPPD, there are other factors to consider.

BerryDunn has determined that the average time per CFS for the OPPD is 58.28 minutes.[63] Using this number, and a 30% availability factor for patrol officers, OPPD officers can be expected to manage three CFS per shift.[64] When these data are examined based on the average number of CFS per shift, the number of required officers is 53, or 60,[65] when factoring in for underreported workload data (see Table 4.5).

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[61] SDI Table 4.22
[62] SDI Table 4.23
[63] SDI Table 4.19
[64] SDI Table 4.24
[65] SDI Table 4.25

Another point of analysis of CFS response data involved examining the total number of CFS handled on average by OPPD officers, based on staffing totals. The totals for benchmark cities and prior BerryDunn studies show an average per-officer CFS volume between 539 and 548. The average number of annual CFS for the OPPD is 401.[66] Although the average number of CFS handled per officer for the OPPD is comparatively low, it is important to note that these comparisons do not take into account the amount of time consumed for each CFS. As shown in Table 4.2, the OPPD has a substantially higher on-scene time than comparison cities. The longer on-scene times reduce officer availability and affect the number of CFS they can manage.

It is also important to understand that these data provide average totals, which presume an equal distribution of CFS by patrol beat and by hour, which is not accurate. As noted in Figure 4.2, most CFS volume occurs in the middle 16 hours of the day. This means that those officers working during these periods experience a per-officer CFS spike, while those working the overnight shift are managing less volume overall. This illustrates the need to adjust the work schedule to accommodate peaks in CFS volume, and that per-officer averages, while comparatively helpful, do not provide the full context of the work effort.

Workload Model and Analysis

Measurement standards make it possible to evaluate and define patrol staffing and deployment requirements, and BerryDunn uses a specific model for doing this. The primary standards employed for the OPPD assessment include:

- Operational labor
- Administrative labor
- Uncommitted time

In the workload model used by BerryDunn, 30% is allocated to each of the labor areas, with a 10% buffer available to allow for daily variances.

Operational Labor

Operational labor is the aggregate amount of time consumed by patrol officers to answer CFS generated by the public and to address on-view situations discovered and encountered by officers. It is the total of criminal, non-criminal, traffic, and backup activity initiated by a call from the public, or an incident an officer comes upon (obligated workload). When expressed as a percentage of the total labor in an officer's workday, operational labor of first response patrol officers should not continuously exceed 30%.

As previously indicated, in order to quantify the amount of workload volume, the BerryDunn team conducted a thorough examination of CAD data provided by the OPPD. In processing the

[66] SDI Table 4.26

CAD database for analysis, BerryDunn identified non-CFS response and self-initiated data from the dataset. After processing the CAD data, the data reflected 22,221 hours of community-initiated patrol CFS workload.[67] After making these reductions, certain hours (self-initiated criminal activity, supplanting) were added back into the totals, as these hours represented part of the obligated workload. Generally, data within the *supplemental patrol* and *non-patrol* categories are not considered part of the workload for patrol. Units in this area typically include CSOs, Animal Control, task force units, light duty officers, and special traffic units. However, on examination, a significant amount of the data in these categories is likely the result of *supplanting*. In this context, supplanting refers to officers or supervisors who act as primary CFS officers even though this is not part of their general work duties. When this occurs, it reduces the workload burden for patrol, artificially reducing their obligated workload total.

BerryDunn knows supplanting is occurring at the OPPD based on conversations with staff and a review of the CAD data). Several individuals interviewed said there are times when staffing in patrol is low, and employees from other units have had to assist by taking CFS. BerryDunn notes that this is commonplace in law enforcement agencies; however, when this occurs, it makes calculating the obligated workload for patrol more difficult. For the OPPD, the amount of estimated supplanting is substantial, accounting for 15.13% of the obligated workload volume. This is likely due, at least in part, to staffing vacancies. Based on a full analysis of the CAD data, and considering several variables, BerryDunn developed Table 4.5, which outlines the patrol staffing needs for the OPPD.

[67] SDI Table 4.3

Table 4.5: Obligated Workload Model – Patrol 30%

	Literal Explanation and Formula	FY 21-22 Model 1	FY 21-22 Model 2
A-1	Primary Patrol Unit Obligated Hours - Community CFS	13,827	13,827
A-2	Back-Up Patrol Obligated Hours	8,394	8,394
A-3	Primary Patrol Sergeants Obligated Hours	639	639
A-4	Back-Up Sergeant Obligated Hours	1,651	1,651
A-5	Primary Patrol Unit Obligated Hours - Officer-Initiated: Criminal Incidents	561	561
A-6	Back-Up Patrol Obligated Hours	466	466
A-7	Primary Patrol Sergeants Obligated Hours Officer-Initiated: Criminal Incidents	3	3
A-8	Back-Up Sergeant Obligated Hours	46	46
A Subtotal		**25,587**	**25,587**
A-9	COP Officers, Sergeants; Primary CFS - Supplanting	494	494
A-10	COP Officers, Sergeants; Backup CFS - Supplanting	510	510
A-11	Detectives; Primary CFS - Supplanting	57	57
A-12	Detectives; Backup CFS - Supplanting	746	746
A Subtotal		**1,807**	**1,807**
A Total		**27,394**	**27,394**
A-13	**COVID-19 Factor (10%)**		**2,739**
Adjusted	**Obligated Hours - Adjusted**		**30,133**
B	Available Hours per Officer*	1,613	1,613
C	Authorized Strength in Patrol	63	63
D	Current Patrol Hours Available (B*C)	101,619	101,619
E	Current % Obligated to Citizen CFS (A/D)	**26.96%**	**29.65%**
F	Target Obligated Workload (30%)	30.00%	30.00%
G	Officer Workload Hours Available at 30% (B*F)	483.90	483.90
H	Patrol Officers Required to Meet Target Workload (A/G)	57	62
I	**Additional Primary CFS Response Officers Needed (H minus C)**	**-6**	**-1**

Source: Calculations from Agency Data Provided

As part of the overall analysis, BerryDunn concluded that many non-patrol staff hours were likely part of the obligated workload and these hours represent supplanting. BerryDunn reviewed the CAD file provided and noted many community-initiated hours for these supplemental units related to typical patrol CFS, including:

- Motor vehicle crashes
- Criminal incidents
- Traffic CFS (not traffic stops)
- Service incidents

For that reason, BerryDunn added these hours back into the obligated workload total in Table 4.5. In addition, BerryDunn noted several officer-initiated hours relating to criminal incidents and motor vehicle crashes, which, if not for the officer discovering them (or being flagged down), would have been reported. Again, these hours were also added to the workload totals.

The data in Table 4.5 is broken out into two models. Each of the models begins with the baseline of primary and backup patrol hours; see lines A – 1 and A – 2. Then, based on BerryDunn's evaluation, certain hours have been added or subtracted as shown in lines A – 3 through A – 12. Within the CAD dataset, BerryDunn found several CFS that had on-scene times exceeding eight hours. High on-scene times are almost always the result of a CFS that was not closed, either because the officer failed to clear the call, or because the dispatcher did not close it out (or both). Regardless of how they occur, these CFS are not accurate, and they can affect various calculations within the CAD dataset. Accordingly, BerryDunn removed all CFS with an on-scene time exceeding eight hours.

Based on the full analysis of the data in model 1, the OPPD requires 57 staff assigned as patrol officers to manage the overall volume. Models 1 and 2 are identical, except that BerryDunn has added 10% to the overall workload calculations. This addition—which is an estimate, based on BerryDunn's observations of CAD patterns across various other police departments—is provided to represent how workload reductions due to COVID-19 might affect staffing calculations. For model 2, the required number of patrol officers for the OPPD should be 62, which is remarkably aligned with the 63 positions the OPPD currently allocates to patrol. BerryDunn notes that various other calculations suggest staffing levels for the OPPD should be 59-60 officers.[68] [69]

Based on the overall analysis of the data available, BerryDunn is recommending the OPPD staff 60 sworn patrol officer positions. With efficient deployment of patrol personnel, and maintaining this staffing number as a minimum, the OPPD should be able to manage patrol workloads without the need for supplanting (except in unusual or extreme circumstances). BerryDunn's conclusion is also predicated on the addition of CSO personnel as outlined in Chapter 3. The addition of these personnel will relieve a portion of the low-level workloads currently being managed by patrol and should allow for reallocation of 3 patrol positions to other OPPD operational areas, without service reductions (assuming the Patrol Division is fully staffed).

[68] SDI Table 4.22
[69] SDI Table 4.25

Calculating the obligated workload for patrol using CAD data can be challenging. Doing so is complicated by incomplete data and difficulties in enumerating workload data that is associated with supplanting. To help ensure that supplanting data can be captured more readily in the future, BerryDunn recommends the OPPD add a CFS disposition code, which clearly identifies the incident as an assist to the Patrol Section, regardless of the officer who managed the CFS. Although this could easily be done within CAD, it would then require training non-patrol personnel to use this disposition code at the end of the CFS so that future analysis of the data could easily identify non-patrol units that managed a CFS in support of the Patrol Section. Doing this would also allow the department to gain clarity in terms of future workload demands, which might actually support additional personnel over what BerryDunn is currently recommending. In addition, the OPPD should remind personnel of the importance of making sure they check out on calls when they arrive, and that they clear them when they are finished. Again, these practices can help ensure a more complete and error-free CAD dataset for future calculations.

In addition to examining workload volumes across the various areas considered so far, it is also worthwhile to look at how the OPPD compares to other communities in terms of its allocation of personnel to patrol and investigations. The percentage of personnel assigned to patrol for the OPPD is 53.39%, which is comparable to benchmarks and other prior BerryDunn studies. Similarly, the percentage of personnel assigned to Investigations is 13.56%, which is also consistent with comparisons.[70]

Administrative Labor

Precise information is not available in CAD for many administrative activities due to variances in the way agencies and officers record these activities. The interviews and field observations by BerryDunn suggest that administrative time for the OPPD appears to be at the norm. Industrywide, administrative time generally accounts for approximately 25 – 30% of an officer's average day, which appears to be the case at the OPPD. This percentage can seem high to those not acquainted with the patrol function. However, a review of typical patrol activities supports this average.

In order to attempt to illustrate allocations of administrative time that are unaccounted for in CAD, BerryDunn asked the patrol officers to complete a worksheet and survey during two of their patrol shifts. The average time reported for supplemental work by each officer for each shift was approximately 83 minutes.[71] This does not include reports associated with CFS. It is also noteworthy that this survey spanned only two of the officers' normal shifts (BerryDunn did not identify which shifts to use). While representative of the supplemental workload, it is possible that a longer period of analysis might provide varied results. Regardless, the numbers above help to demonstrate a substantive administrative workload, which is otherwise not typically captured or considered. This data is consistent with prior BerryDunn studies.

[70] SDI Table 4.27
[71] SDI Figure 4.4

Uncommitted Time

The cumulative operational and administrative labor that officers must engage in should not be so significant that they are unable to respond to emergencies in a timely fashion or engage in mission-critical elective activities and problem-solving efforts. A proportion of the workday must be uncommitted to any other type of labor. Uncommitted time allows officers to do the following:

- To have and initiate public-service contacts
- To participate in elective activities selected by the agency, such as community policing and problem solving
- To make pedestrian and business contacts
- To conduct field interviews
- To engage proactive traffic stops and proactive patrol efforts

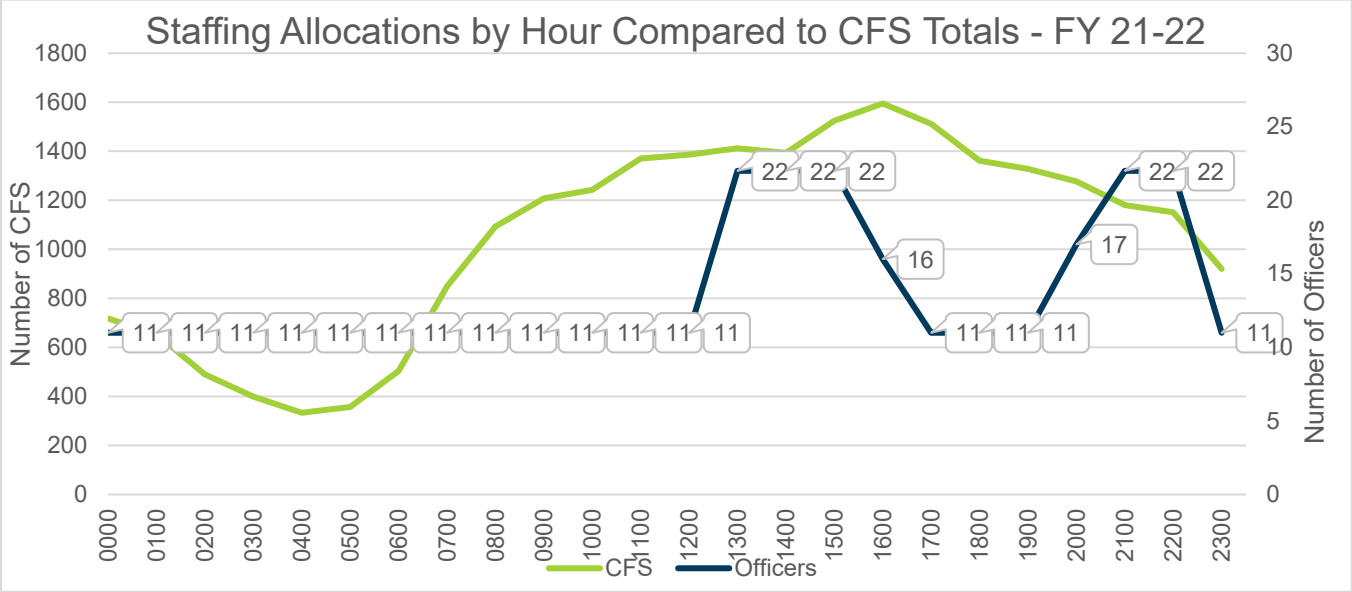
Uncommitted time is the time left over after officers complete the work associated with both obligated/committed time and administrative time. A general principle for distribution of time for patrol is 30% across the board for administrative, operational, and uncommitted time, with a 10% flex factor. Ideally, particularly for service-driven organizations, the remaining 10% becomes uncommitted time, allowing officers more time for proactive community engagement. For a jurisdiction like the OPPD, with its stated focus on exceptional service and community policing, no less than 40% uncommitted patrol time is ideal.

In BerryDunn's experience, the percentage of administrative time generally mirrors operational labor totals. In other words, if a patrol officer is spending 35% of his or her time engaging in obligated workload, administrative time will likely capture 35% of his or her daily responsibilities. This is likely due to the types of administrative duties that typically follow the obligated workload, such as conducting follow-up, processing evidence, and writing reports. Essentially, if either the operational or administrative percentages are over 30%, then the percentage of uncommitted time will be negatively affected.

V. Patrol Work Schedule

One of the most common areas of concern BerryDunn discovers in conducting operational studies is related to patrol staffing allocations. Figure 4.6 below provides a graphic visual snapshot of the staffing allocations for OPPD, as compared to average hourly CFS totals.

Figure 4.6: Staffing Allocations vs. CFS Totals



Source: CAD/Agency Provided Data

Patrol staff across the industry typically indicate concerns about not having enough officers on the street at any given time to ensure that community complaints are handled in a timely manner, and staff also commonly indicate that patrol shifts often do not have a full complement of officers working and available to handle CFS, and that working at or below shift minimums is the standard practice. BerryDunn heard similar comments in from the OPPD.

Although the design of the patrol schedule intends to align hourly CFS volume with the number of officers deployed, the staffing peak is not aligned with the CFS peak. In addition, the flexibility of the patrol schedule does not fully account for leave time and the cyclical pattern of leave time use (see Figure 4.5). BerryDunn also asked the OPPD to manually calculate the actual work shifts for each month for 2020 and 2021. Although the desired/maximum total number of officers scheduled is 33, the actual average staffed in those two years was 26.[72]

This information is important because it helps to illustrate actual staffing, as opposed to officer allocations. Based on these data, the OPPD has generally staffed at an optimal number (26), as determined by the CAD data and BerryDunn's analysis. However, staffing 26 officers on a daily basis only works if the patrol schedule fully aligns with workload demands. As Figure 4.6 and the OPPD Patrol schedule self-evaluation indicate,[73] the patrol schedule does not distribute personnel in an optimal manner; BerryDunn elaborates on the patrol schedule later in this chapter.

[72] SDI Figure 4.5
[73] SDI Table 4.29

BerryDunn also examined all CFS for the OPPD based on the most common type of CFS by patrol beat. The top 11 CFS types involve 18,402 incidents, or 68.22% of all CFS volume. Notably, of the top 11 incident types, none involve serious crimes, with only theft and disturbance/disorderly conduct being classified as crimes.[74]

Patrol Schedule Discussion

Many law enforcement agencies struggle with designing work schedules that efficiently and optimally deploy available patrol resources. The path to developing an efficient work schedule that optimizes the effective deployment of patrol personnel requires thoughtful consideration of several overarching goals:

- Reducing or eliminating predictable overtime
- Eliminating peaks and valleys in staffing due to scheduled leave
- Ensuring appropriate staffing levels in all patrol zones or beats
- Providing sufficient staff to manage multiple and priority calls in patrol zones or beats
- Satisfying both operational and staff needs, including helping to ensure a proper work/life balance and equitable workloads for patrol staff

Designing a schedule that accomplishes these goals requires an intentional approach that is customized to each agency's characteristics (e.g., staffing levels, geographic factors, crime rates, zone/beat design, contract/labor rules), and there are several key components that bear consideration in that process. As part of this project, BerryDunn asked the OPPD to complete a self-assessment of its patrol work schedule against a set of prescribed standards. Based on the self-assessment, the OPPD scored 20 points on this assessment out of a maximum of 25 points.[75] If accurate, this would suggest the work schedule is meeting operational objectives and adjustments are not needed. However, based on BerryDunn's review of the schedule, there is a need for the OPPD to adjust its scheduling model.

The OPPD identified four critical areas (as identified by the assessment instrument) in which the patrol schedule is lacking. However, BerryDunn notes that one section the OPPD evaluated as satisfactory, which involves reduction of peaks and valleys that occur due to leave patterns, is not fully satisfied by the current schedule (see Figure 4.6). In short, the OPPD would benefit from making adjustments to the patrol work schedule, to maximize the use of the personnel assigned to managing patrol volume. BerryDunn recommends that OPPD command staff review the patrol schedule in the OARM report for additional information on patrol schedule designs.

[74] SDI Table 4.28
[75] SDI Table 4.29

Patrol Staffing Summary

Based on a thorough analysis of the obligated workload for patrol, BerryDunn calculates that, when properly deployed, the OPPD can manage CFS volume with an allocation of 60 officers to the Patrol Section. In Chapter 3, BerryDunn has recommended the addition of non-sworn CSO personnel, and there is reason to believe that adding these personnel will reduce/balance the obligated workload for patrol. If the CSO positions are not added as recommended, it is possible that CFS patterns that are unaffected by COVID-19 may push CFS volumes beyond optimal levels for patrol staff.

BerryDunn's recommendation of staffing 60 officers in patrol reflects the minimum number of officers required to operate and to respond to CFS effectively and efficiently (subject to ongoing monitoring and additional workload calculations). This number is considered the *operational minimum*, and it is the baseline for staffing, not the maximum. Equally as important is understanding that the department occasionally has personnel who are non-operational, meaning that due to the Family Medical Leave Act (FMLA), military leave, or injury, they are unable to fulfill their duties. For calculating staffing needs, non-operational personnel are essentially vacancies, which must be filled to ensure staffing at the *operational minimum* level.

To maintain minimum operational staffing levels, some agencies discuss using *over-hires* in order to cover the lag-time associated with hiring and training personnel. Rather than discussing over-hires, BerryDunn suggests that agencies should establish a *minimum operational level*, which will help ensure maximum operational efficiency, and then set a new *authorized staffing level*, which offsets agency attrition levels and the vacancies that occur as a result of non-operational personnel. BerryDunn discusses this further in Chapter 10.

VI. Traffic Enforcement

The OPPD uses a general approach to traffic enforcement and patrol officers have the responsibility for traffic enforcement within the Village. Patrol officers are expected to engage in traffic enforcement, and/or to answer traffic-related CFS during the course of their shift, as workload demands or allows. However, as noted in Figure 4.3 and throughout this report, patrol staff have limited time available for proactive activity. This section provides additional details concerning traffic enforcement by the OPPD.

Activity

BerryDunn evaluated traffic violation data provided by the OPPD for 2017 through 2021. The number of violations have remained relatively consistent over this period, and average annual totals reflect 1,779 incidents.[76]

[76] SDI Table 4.30

BerryDunn notes here that in recent years, many police agencies have experienced sharp declines in overall traffic enforcement and citation numbers. Those BerryDunn has interviewed on several projects have suggested that the national climate has discouraged officers from being proactive and writing citations. Despite industry trends or concerns expressed in other studies, BerryDunn notes that traffic enforcement is an important element of public safety, and one that requires continued effort.

As BerryDunn has shown in Figure 4.3, the OPPD's officer-initiated activity, as a percentage of overall volume, is comparatively low. Still, persistent traffic enforcement—even through the pandemic years—is an indication of persistence and operational focus on traffic safety.

Motor Vehicle Crashes

In addition to reviewing traffic violation data provided by the OPPD, BerryDunn also examined all traffic-related data within CAD.[77] This data reflects nearly 6,000 hours of community-initiated activity relating to traffic. This data also shows 2,600 hours of volume associated with motor vehicle crashes.[78] This volume consumes the entire availability of five full-time police officers (see Table 4.5). This data is particularly important because managing motor vehicle crashes is a CFS type that can be diverted in whole or in part to CSOs, with obvious reductions to patrol workloads.

Trends

BerryDunn is aware that Oak Park is a major connector to the Chicago metropolitan area, and that the daily traffic volumes are substantial. Accordingly, BerryDunn is not surprised to see that the number of motor vehicle crashes in Oak Park total nearly 4,000. As BerryDunn has mentioned, traffic enforcement is an important public safety function, and given the volume of motor vehicle crashes in Oak Park, the OPPD should continue its efforts in this area. BerryDunn also examined motor vehicle crashes by hour of the day.[79] These data are consistent with the CFS volume patterns reflected in Figure 4.2. These patterns also demand appropriate staffing levels during pattern peaks, to respond to service demands.

VII. Alternative Response

Many police agencies in the U.S. have been struggling with increasing CFS workloads, while simultaneously facing ever-tightening budgets and unprecedented attrition and vacancy rates. As a result of these challenges and national trends calling for police response reform, many communities and police departments have started to consider revisions to the traditional police CFS response model.

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[77] SDI Table 4.31
[78] SDI Table 4.32
[79] SDI Figure 4.6

Considering alternatives to police CFS response is not new; in fact, many agencies already use some form of CFS diversion, whether through a TRU, online reporting, mobile apps, or the use of non-sworn personnel. What is different and new in the most recent discussion of CFS response alternatives is an understanding that this conversation is not simply about providing these alternatives as possible options—it is about considering fundamental changes to how police departments do business, including identifying collaboration opportunities with other organizations, and in some cases outsourcing certain CFS types entirely.

The Village asked BerryDunn to assist with an objective evaluation of alternatives to the traditional police response model. BerryDunn conducted this work in conjunction with this project and has included the results in Appendix B of this report.

In short, through this process, BerryDunn learned that numerous opportunities exist for the OPPD to divert CFS volume. This includes development of an online reporting process, a full TRU, and diverting certain CFS to CSOs operating in the field. Additional opportunities exist for outsourcing certain CFS types with external partners and expanding the collaborative arrangement with Thrive Counseling Center.[80]

VIII. Patrol Operations

This section provides details on other patrol operation areas.

NIBRS Submissions

During BerryDunn's interviews, OPPD personnel revealed that Records staff spend considerable time and effort manually entering, correcting, and validating incident reports to ensure they are NIBRS compliant. This activity requires Records personnel to review reports, send a large number of them back to patrol for additional information and/or corrections, and make entries and corrections themselves.

BerryDunn also learned through interviews that the RMS system at the OPPD is designed to automatically submit NIBRS data, but that numerous errors in the incident report submissions have impeded this process. Entry of NIBRS data should be occurring at the patrol-officer level, and the accuracy of this process should be confirmed by patrol supervisors when reviewing submitted reports. At present, this is not occurring consistently, and the OPPD should take steps to correct this issue.

It is notable that NIBRS entry by field personnel is relatively new. Under the prior UCR submission process for submitting crime data to the FBI, this coding occurred at the Records level. Accordingly, it is likely there are significant training and NIBRS familiarity issues contributing to this issue.

[80] SDI Table 4.33

Domestic Violence (DV) Investigation

Based on interviews with staff, BerryDunn learned the OPPD does not currently utilize a lethality assessment program for DV. In contrast to many police calls, a prior history of calls and behaviors is a critical element in understanding DV incidents and in preventing them from escalating or recurring. Recording all possible DV cases is a critical step in developing a full history of events for any future instances.

Although the OPPD appropriately documents all DV cases, BerryDunn recommends that the OPPD update its DV policy and the associated procedures. Although the OPPD policy manual outlines response to DV cases, the policy is in need of revision. The policy does not include a lethality assessment as a part of the DV response protocols, and this a national best practice for law enforcement.

Lethality assessment programs (LAP) were developed as a multi-pronged intervention consisting of a standardized, evidence-based lethality assessment instrument (i.e., survey) and accompanying referral protocol that helps first responders make a differentiated response tailored to the unique circumstances of high-danger victims. The dual goals of the LAP are to educate DV victims about risk factors for increased lethality and to connect them with support and safety planning services. Collaboration, education, and self-determination are the touchstones of this intervention. Research also indicates DV perpetrators often engage in additional community violence. Proactively addressing DV through implementation of a LAP can provide improved outcomes for DV survivors, communities at large, and police agencies themselves. The OPPD should review all of its DV response protocols with all appropriate stakeholders and develop a revised policy that includes a lethality assessment.

Solvability Factors

The OPPD should review and revise how criminal cases are reviewed and assigned for follow-up. The case review and assignment process currently utilized by OPPD is inefficient, inconsistent, and not clearly understood by all interested parties. Patrol, investigators, and the community lack a clear understanding of exactly which cases will be assigned for follow-up investigation. This leads to inconsistent behavior and diminished trust and faith.

One critical element of case review and assignment involves the use of solvability factors. The OPPD does not formally or consistently engage the use of solvability factors as an assessment tool in determining which cases should be activated for additional investigation. This means that Investigations supervisors spend a great deal of time reviewing reports which are never going to actually be assigned for follow-up investigation.

The reality of modern policing is that many CFS that include crimes reported to the police do not have actionable leads or those that would make investigation likely to produce a suspect. A great deal of research has been performed on what leads or evidence make a case likely to produce results and when the absence of such leads makes follow-up likely to be unproductive. These conditions are generally called solvability factors, and a weighted algorithmic scale of these factors can provide guidance on the anticipated effectiveness or efficiency of investigative follow-up.

There are numerous variations of this assessment model, but most emanate from the foundational work done by the Rochester, NY, Police Department in the late 1970s. In that study, researchers isolated the common elements present in cases reported to the police that were successfully investigated. From that research, a series of common factors (solvability factors) were identified.[81] By considering whether one or more of these factors is present on any given case, police departments can focus their efforts on cases that have a reasonable opportunity for a successful resolution, and they can close those that are unlikely to be solved even with reasonable investigative effort.

Forwarding a case to investigations consumes time and energy from both patrol and investigations personnel who each must review and dispose of the case. Automated solvability factors deployed within RMS utilize software to make this process more efficient. The reporting officer documents the known factors about the incident, and the RMS automatically classifies and routes the case without investigations personnel having to spend time and energy to receive, review, assess, and dispose of the case.

Solvability factors include information such as whether there is a known suspect, whether there is a vehicle description, whether there are witnesses to the crime, and whether there is physical evidence. The sum of these factors comprises the baseline of a thorough preliminary investigation. If officers do not collect this information and report on it, one could reasonably assert that the preliminary investigation and/or the report was incomplete.

By design, requiring patrol staff to collect and record this information helps to ensure a thorough preliminary investigation, and it can expedite the process of determining whether a case should be forwarded to a detective for additional investigation. BerryDunn is unclear whether the RMS in use by the OPPD has the capability to collect solvability factors. This recommendation can provide significant efficiency for the OPPD, and if the RMS is unable to accommodate their automated capture, this would be another shortcoming of the current RMS that further supports the need for its replacement. Regardless of how it occurs, BerryDunn recommends the OPPD revise the report-writing and approval process and include solvability factors as a required element within that process for all personnel generating criminal reports.

IX. Juveniles and Youth Engagement

Interactions with juveniles are an important element of policing. Positive police interactions with juveniles contribute to improved relationships and trust between the police and youth. Further, programs and projects that contribute to engaging youth in decision-making, problem solving, and collaborative efforts (such as restorative justice, youth courts, and peer interventions) lead to a sense of citizenship and contribute to reducing juvenile crime.

[81] Managing Criminal Investigations in Rochester, New York – A Case Study
https://www.ncjrs.gov/App/Publications/abstract.aspx?ID=92744

The OPPD uses juvenile officers to help ensure the rights of juveniles are not violated. These officers are specially certified and are brought in on any criminal case involving a juvenile, and they are required to be involved any time a juvenile is being questioned by the OPPD.

Based on conversations with OPPD staff, BerryDunn learned that the emphasis on juvenile investigations is to resolve the matter in the least intrusive manner. Protocols involve conversations with juvenile detention screening to determine whether placement is required, or if the juvenile can be released to go home. The department also has options for restorative justice, mediation, Time or Face IT, and other diversion programs. In addition to the rules guiding criminal investigation involving juveniles, the OPPD also has youth investigators, who are responsible for interacting with youth and who specialize in juvenile crime and juvenile investigations.

The OPPD has hosted a youth basketball camp and junior citizen's police academy in the past, and has also partnered with River Forest for these programs. Although the OPPD had SROs in the past, they no longer have them.

The juvenile officer program is a best-practice example of holding juveniles accountable for their actions while still helping to ensure their rights are not violated. The OPPD engages in some juvenile partnerships; however, the loss of SROs has reduced direct contact with juveniles. BerryDunn recommends the OPPD continue to pursue opportunities to partner and interact with juveniles.

Summary

The OPPD staffs the Patrol Section with 63 officers who have the primary responsibility for CFS response within the community. These officers are responsible for patrolling the eight designated patrol zones within Oak Park.

Like many departments, certain data, such as report-writing time and supplanting volume by non-patrol units, are not tracked within the CAD system. Adjusting data-gathering practices in CAD can be an important component of ongoing monitoring of staffing needs and personnel deployments.

BerryDunn's analysis of the OPPD workload suggests that staffing and appropriately scheduling 60 officers in patrol should be sufficient for managing the CFS volume. As noted, this staffing level is predicated upon and presumes the addition of non-sworn uniformed personnel (CSOs) for field deployment.

The current patrol work schedule is limiting the effectiveness of patrol deployments, most notably because it lacks the flexibility to adjust to peak CFS volumes. Adjusting the patrol schedule should aid in balancing resources against service demands, and also provide ancillary benefits such as reduced overtime and better availability for officers to take time off.

Through engaging an Essential CFS Evaluation process, BerryDunn has identified several possible options for methods to mitigate workloads for patrol, and to refer some CFS to more appropriate resources. The result of that process was identification of a need for a more robust

alternative service plan and strategy. Additionally, the recommendations from that process include adding non-sworn uniformed personnel to staff a TRU and to respond to other field-based CFS that do not require a sworn officer.

Errors by patrol staff in competing NIBRS entries have resulted in additional and unnecessary work for Records personnel. Additional training and accountability by supervisors can help correct this issue.

The OPPD is not currently using a lethality assessment for DV investigations. The use of a lethality assessment is a national best practice and helps identify potentially life-threatening conditions for DV victims. BerryDunn recommends the OPPD implement a lethality assessment protocol.

At present, the process of referring cases for review and assignment by Investigations is inefficient. Although there are various components to this process, a key element involves the use of solvability factors within the preliminary investigation process at the patrol level. Using solvability factors helps clarify which cases are potentially solvable, and which are likely not, and it informs decisions on which cases to activate for investigative follow-up.

Recommendations

This section provides the five formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 4.6: Chapter 4 Recommendations

Patrol Services		
No.	**Patrol Schedule Analysis**	**Overall Priority**
Chapter 4 Section V: Patrol Work Schedule		
4-1	**Finding:** The patrol work schedule for the OPPD is not effectively or efficiently meeting staffing and personnel distribution needs for the department. The patrol schedule lacks flexibility and consistency, and it does not adjust to peaks and valleys for CFS or leave time, among other challenges. Because of continuity of scheduling issues, the current patrol work schedule does not consistently align with geographic policing expectations, and this reduces the ability of the department to fully engage COP work in each of the patrol districts and beats.	
	Recommendation: The OPPD should consider revising the patrol work schedule to maximize efficiency and distribution of personnel. Based on the numerous data provided and evaluated, it is evident that the current work schedule in use by the OPPD is not maximizing the use of personnel. BerryDunn recommends that the OPPD engage a committee to review the work	

Patrol Services		
No.	**Patrol Schedule Analysis**	**Overall Priority**
	schedule, in light of the information contained in this report, and that a new schedule be developed that will meet department, staff, and community needs.	

Patrol Services		
No.	**Alternative CFS Response**	**Overall Priority**
Chapter 4, Section VII: Alternative CFS Response		
4-2	**Finding:** The OPPD has used alternative CFS response on a limited basis, but opportunities exist to significantly expand upon alternative CFS response methods and resources.	
	Recommendation: The OPPD should develop a comprehensive alternative CFS response plan and seek approval from the Village Council on the new model. The alternative CFS response plan should consider numerous elements, including: • Establishing a TRU • Adding non-sworn personnel (similar to CSOs) to staff the TRU, and to manage other in-person responses that do not require a sworn officer • The addition of professional non-sworn staff (e.g., mental health worker, social worker), as well as hybrid/collaborative response, contracted response, and on-call response models • Developing CAD CFS types that clearly categorize certain incidents (e.g., mental health, unhoused) so that these data may be easily monitored in the future • Evaluating hybrid and collaborative responses for appropriate CFS types, and identify whether there are existing resources for response, or if these need to be created and/or augmented • Developing policies and procedures for the diversion of CFS to the TRU, non-sworn personnel, and other external resources; procedures should consider customer preferences and provide accommodations for those, whenever requested • Training agency personnel, dispatch, and community partners on the new model • Providing community education on the new model, including the various reporting capabilities, and how to provide feedback • Monitoring the success of the new model and make appropriate adjustments Additional details on the Essential CFS Evaluation process and findings can be	

Patrol Services		
	found in Appendix B of this report.	

Patrol Services		
No.	**NIBRS Entry**	**Overall Priority**
Chapter 4, Section VIII: Patrol Operations		
4-3	**Finding:** Records personnel are regularly revising NIBRS data on many criminal incidents because of errors by field personnel, and this prohibits fully automating the NIBRS reporting process. **Recommendation:** The OPPD should take steps to improve its quality control measures for NIBRS entry to minimize errors and the need for Records personnel to correct them. Automating the NIBRS submission process will have a positive effect on the workload in Records, which will free up time for Records staff to manage other functions. BerryDunn recommends that the OPPD: 1. Work with Records personnel to identify common errors that are negatively affecting automated NIBRS submissions. 2. Provide training to staff who submit incident reports to improve the understanding of submission requirements, common errors, and department expectations. 3. Require patrol chain-of-command to perform quality assurance review of NIBRS-related data in incident reports, and direct patrol supervisors to only approve incident reports that are free of submission errors. 4. Hold staff accountable for proper completion of incident reports, including critical data points required for automated NIBRS submission.	

Patrol Services		
No.	**DV Lethality Assessment**	**Overall Priority**
Chapter 4 Section VIII: Patrol Operations		
4-4	**Finding:** The OPPD does not currently utilize a lethality assessment program for domestic violence. **Recommendation:** The OPPD should revise its policy and practices to expand its DV investigation protocols to include a lethality assessment program. Lethality assessment programs (LAP) were developed as a multi-pronged	

Patrol Services		
No.	**DV Lethality Assessment**	**Overall Priority**
	intervention consisting of a standardized, evidence-based lethality assessment instrument (i.e., survey) and accompanying referral protocol that helps first responders make a differentiated response tailored to the unique circumstances of high-danger victims. Research indicates domestic violence perpetrators often engage in additional community violence. Proactively addressing domestic violence through implementation of a LAP can improve outcomes for DV survivors, communities at large, and police agencies themselves. The OPPD should review its DV response protocols with all appropriate stakeholders and develop a revised policy that includes a lethality assessment	

Patrol Services		
No.	**Solvability Factors**	**Overall Priority**
Chapter 4, Section VIII: Patrol Operations		
4-5	**Finding:** The OPPD's current RMS provides the opportunity to utilize automated solvability factors on investigations, but those solvability factors are used only informally, and field personnel do not have access to add them.	
	Recommendation: The OPPD should require utilization of automated solvability factors available within RMS. These should be completed by patrol staff and reviewed by patrol supervisors as a part of the incident report approval process. Solvability factors should include information such as whether there is a known suspect, whether there is a vehicle description, whether there are witnesses to the crime, and whether there is physical evidence. The sum of these factors comprises the baseline of a thorough preliminary investigation. If officers do not collect this information and report on it, one could reasonably assert that the preliminary investigation and/or the report was incomplete. By design, requiring patrol staff to collect and record this information helps to ensure a thorough preliminary investigation, and it can expedite the process of determining whether a case should be forwarded to a detective for additional investigation. It is possible that the RMS at OPPD has the capability to collect solvability factors, however the field reporting platform does not currently allow patrol officers to complete them. BerryDunn has recommended elsewhere in this report that the RMS and field reporting systems be adjusted to accommodate this process. Accordingly, BerryDunn recommends the OPPD revise the report-writing and approval process and include solvability factors as a required element within that process for all personnel generating criminal reports.	

Chapter 5: Community Engagement

Community Engagement: includes a review of community policing philosophies and actions by the agency, impartial policing strategies, engagement with the media, and problem-solving efforts and methods.

I. Community Policing

BerryDunn had an opportunity to examine the community policing efforts of the OPPD, including discussions with staff and government leaders, a review of the policy and organizational goals of the department, and feedback from community stakeholders. Based on this extensive review, it is evident that community engagement and the concept of community policing are part of the core organizational philosophy of the OPPD.

Although there are myriad definitions for community policing, the 21st Century Policing Task Force final report explains:

> Community policing emphasizes working with neighborhood residents to co-produce public safety. Law enforcement agencies should work with community residents to identify problems and collaborate on implementing solutions that produce meaningful results for the community...[82] Neighborhood policing provides an opportunity for police departments to do things with residents in the co-production of public safety rather than doing things to or for them. [83]

This concept is in keeping with the policing philosophy of Sir Robert Peel, crafted in 1829, that still holds true today, which states:

> The police at all times should maintain a relationship with the public that gives reality to the historic tradition that *the police are the public and the public are the police;* [emphasis added] the police are only the members of the public who are paid to give full-time attention to duties which are incumbent upon every citizen in the intent of the community welfare.[84]

Despite the OPPD's stated organizational philosophy of community policing, and the fact that the OPPD engages in several best-practice COP strategies, there are opportunities for improvement.

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[82] Final Report of The President's Task Force on 21st Century Policing – http://www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf
[83] Final Report of The President's Task Force on 21st Century Policing – http://www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf
[84] https://www.durham.police.uk/About-Us/Documents/Peels_Principles_Of_Law_Enforcement.pdf

Community Policing Philosophy

BerryDunn notes that the leadership of the OPPD has been effective and intentional with respect to supporting and establishing relationship-building and basic community policing efforts as an organizational philosophy. Because of its importance to this discussion, BerryDunn has repeated a portion of the OPPD mission below:

> The Department follows a community-based policing philosophy that relies on citizen involvement, problem solving, ethical behavior, leadership, and the value of employees.

The OPPD mission reflects an orientation to community policing, community engagement, and community relationship-building. The clear and formal expression of these ideas, which underpin community policing, is important because they set the stage for what is expected of all members of the organization. However, based on BerryDunn's interviews and observations, and an analysis of the data, those within the Patrol Section have not fully engaged in meaningful community-oriented policing (COP) activities, particularly formalized problem-oriented policing (POP) efforts, primarily due to workload and staffing constraints and a lack of formal training and education on the fundamental application of core COP and POP principles.

Those in patrol whom BerryDunn interviewed said they are aware of the values of the department regarding community policing. When asked, most staff BerryDunn interviewed had a fundamental, but very basic, understanding of COP that focused on how community members are treated and building relationships. Staff described COP in various manners, including treating people with respect and dignity, enhancing relationships, and building trust.

BerryDunn learned that although COP is an operational philosophy promoted by the OPPD, the department does not have a firm requirement for COP efforts by patrol officers, and these efforts are not tracked. Further, the OPPD does not provide regular COP training for patrol officers and does not require new officers conduct a COP/POP project as part of their field training. Each of these areas represent an opportunity for the OPPD to expand its COP philosophy throughout the organization, and to produce improved results.

Community Policing Section

The purpose of the Community Policing Section is to work to develop, implement, and maintain programs to enhance the department's COP philosophy. The primary units within this section include resident beat officers (RBOs)/neighborhood relations officers (NROs), foot patrol, youth investigations, and the emotional support K-9. Staffing for the COP Section includes 12 full-time sworn personnel and the K-9 (additional details on these positions are provided in Chapter 3).

The RBOs and NROs are the cornerstone of the OPPD's COP unit. When fully staffed, the RBOs and NROs include eight full-time officers. RBOs live in Oak Park, while NROs do not, but are assigned a geographic area of responsibility within the Village.

RBOs/NROs epitomize the COP/POP model in practice. They are assigned to specific areas within the community, they get to know community members within their assigned area, hold

regular meetings, and monitor their respective areas for problems requiring focused attention and resolution.

During this project, there was a particularly troubling shooting that occurred within the Village of Oak Park. BerryDunn had an opportunity to observe the response of the OPPD to this situation, which included assembling numerous Village and OPPD resources to address the problem and to identify solutions. BerryDunn also attended a community meeting organized by the OPPD and noted that the approach and conversation was highly consistent with a COP/POP approach. BerryDunn observed that this meeting was well-coordinated, involved numerous solutions-based considerations, and opportunities for community input and involvement.

This circumstance – which is an excellent COP/POP (involving a very serious event) – is a positive for the OPPD, but it also presents an operational challenge. During interviews with various patrol staff, BerryDunn learned that there is an operational philosophy that involves patrol staff forwarding any POP opportunities to the RBOs and/or NROs. Essentially, patrol staff are not expected to take ownership over POP within the Village; instead, these are forwarded to another unit.

This phenomenon—the deferment of POP to specialized units—is not unique to the OPPD; many police departments engage in the same practice. The unfortunate result is a tacit approval for shifting COP/POP responsibility and accountability away from patrol staff. To correct this, BerryDunn recommends that when RBOs/NROs engage in a POP exercise, patrol staff assigned to the respective patrol zone should also be actively engaged in the solution. This will expand the knowledge of patrol staff in developing POP solutions, and it will also infuse additional staff into each POP opportunity.

II. Community-Based Programs and Partnerships

As indicated above, to promote and engage the community-policing philosophy, the OPPD uses a dual approach. Although the OPPD expects all staff to engage in community policing, particularly those in patrol, significant COP and POP activities have been managed primarily by the RBOs, NROs, and command staff.

As a part of the study, BerryDunn asked the OPPD about various community engagement efforts by the department. COP staff mentioned various partnerships with professional affiliates in the area, including Thrive, Oak Park Township, Housing Forward, and Beyond Hunger. Again, the RBOs and NROs hold many meetings, connecting regularly with those in their designated areas.

BerryDunn inquired about formal agreements or established goals for these partnerships and learned that if these documents existed, their location was unknown. BerryDunn notes that these partnerships are valuable, but it is also important to have clear goals and objectives for these relationships, to help ensure alignment with the department's mission. Accordingly, BerryDunn recommends the OPPD inventory all of its professional partnerships, and work through the process of developing guiding documents for the ongoing partnerships.

Although the OPPD has engaged intentional effort to build and sustain relationships with the community, several staff who BerryDunn interviewed indicated that these efforts have been significantly impeded by the pandemic and staffing issues. It is evident to BerryDunn that the OPPD strongly values the fundamental concepts of community policing and is committed to engaging in significant and intentional community-policing efforts.

BerryDunn acknowledges and recognizes the department-wide efforts to engage the community through numerous outreach programs and projects supportive of fundamental values. This level of effort is substantial and commendable, despite recent challenges. In addition, BerryDunn is aware that there are individual officers who, despite workloads and other limitations, engage in individual community policing efforts quite successfully. BerryDunn observes that the OPPD is doing a good job of supporting the concept of community in a wide range of values, projects, programs, and outreach opportunities—especially fundamental relationship-building. However, because of current organizational limitations, the collaborative problem-solving aspects of community policing are not being fully realized within the Patrol Section. This is the substantive focus of the recommendations in this topic area from BerryDunn, with full acknowledgement of the good work being done within the department.

Co-Production Policing

Although it is mentioned in the 21st Century Policing Task Force report and the President's Commission on Law Enforcement and the Administration of Justice report,[85] the term *co-production policing* is relatively new, and little has been written about it within the industry. As expressed in the Task Force report, co-production is about engaging in policing efforts collaboratively with the community. Traditionally, police agencies themselves have set the course for policing priorities within the community; however, making these decisions independently and without community input and involvement works against the notion of transparency, and can foster mistrust and damage relationships.

In the past, as the profession sought to evolve, COP became a mainstay for those in law enforcement, as well as a process for communities to gain increased involvement with their police agencies. However, COP, as often practiced by American police agencies, tends to be mainly transactional with power and authority largely invested in police agencies. Alternatively, co-production policing seeks to rebalance that power dynamic and build authentic partnerships with the community in a way that shares the decision-making authority of policing.

Although COP is an effective strategy and true COP/POP involves the entire organization, these efforts often focus on individual issues or problems, leaving out the broader scope of community involvement. The key distinction is that although COP is informative, interactive, allows for community input, and is often collaborative with regard to problem solving, co-production involves a greater level of *influence and involvement* by the community regarding the

[85] https://www.justice.gov/ag/presidential-commission-law-enforcement-and-administration-justice

overarching policing strategies and priorities that ultimately affect those being served by the police agency.

From a co-production policing perspective, influence and involvement from the community form the foundation for trust and confidence in the police agency and agreement in the processes, procedures, and practices used in pursuit of public safety for those who live in or visit the community. This level of involvement serves as a persistent external accountability process, which helps ensure consistent alignment between community desires and expectations and the actions the police use to meet them. To be clear, co-production is a collaborative process, not an oversight process; these two approaches are incompatible. Co-production involves working together to cooperatively co-produce public safety in a respectful and thoughtful manner that places value on mutuality. BerryDunn refers to its approach to this more collaborative notion of community policing as Community Co-Production Policing (CCPP). Additional information on CCPP is available within the OARM.

As indicated, the OPPD already has several strong partnerships with the community and enjoys substantial community goodwill. However, maintaining those relationships with the community and building upon them through a deliberate process of reform should improve public safety and continue to promote consistent social and procedural justice practices by the agency. There are numerous pathways the OPPD can consider in moving toward a co-production policing environment. Two immediate opportunities for the OPPD include CPOC and development of the alternative CFS response plan.

BerryDunn recommends that the OPPD formally adopt a co-production policing model and that the OPPD work collaboratively with Village leaders and the community to reform police operations and community involvement through this model. As a starting point, BerryDunn recommends that the Village create a committee that represents the unique diversity of the community and possesses real and substantive authority to review and guide decisions about community safety, law enforcement, justice, and the roles, strategies, and approaches of policing within that broader environment.

III. Citizen Police Oversight Committee

One aspect of this project involved the evaluation of the CPOC. Areas of evaluation and inquiry included the structure, policy, function, and authority of the CPOC, including discussion with the National Association for Civilian Oversight for Law Enforcement (NACOLE). BerryDunn conducted a series of interviews with Village Board members, CPOC members, OPPD staff, and NACOLE. BerryDunn also reviewed various documentation regarding the CPOC, including the FTT report that was distributed in April 2020.

Background

The origins of the CPOC trace back to the 1980’s, when racial tensions within the OPPD prompted development of this model. The CPOC was initially focused on internal race issues, including promotional processes and outcomes. Over the years, the mission of the CPOC

shifted from an internal focus to one that exclusively involves the review of internal affairs (IA) investigations that result from external complaints.

At present, the primary role of CPOC involves the review of completed investigations from the OPPD, including the final finding and determination of any discipline. This process involves discussion with the chief of police or a designee on the investigation and its outcomes. The CPOC can ask questions and even ask the chief to conduct additional investigation. However, there is no formal mechanism for this, and the CPOC has no authority to compel this, or to influence the decision of the chief on the findings of the investigation. Ultimately, the CPOC votes to either concur or disagree with the findings, and this information is included in a semi-annual report provided to the Village Board.

Feedback

Those BerryDunn interviewed provided a broad range of perspectives on the CPOC. BerryDunn heard many comments about the professionalism of the OPPD and the hardworking nature of its officers. Several also acknowledged the national climate and the additional challenges officers face in meeting community and societal expectations. Many—even those with positive comments—also provided observations that the OPPD has blind spots with respect to implicit bias and that negative comments about the department are typically met with defensiveness and resistance. Several of whom BerryDunn interviewed directly expressed the desire to help the OPPD improve, and that the CPOC can and should be integral to that process.

Those involved with CPOC whom BerryDunn interviewed expressed several desired improvements:

- Greater transparency from the OPPD on IA complaints
- Access to all complaints about the OPPD, whether internal or external
- Expanded independence and authority
- More community interaction and education
- Influence over OPPD policies or procedures
- Better training for members of the CPOC on its role, and on relevant policies and guiding rules
- Improved reporting and classification of complaints, including an implicit bias/impartial policing designation for any complaint that fits within that category

In summary, the CPOC expressed a desire to move from what often feels like a rubber-stamp process, to one that is independent, impactful, and authorized to foster meaningful positive changes to support the professionalism of the OPPD.

NACOLE

BerryDunn interviewed a representative from NACOLE to gather additional perspectives on oversight boards and CPOC. Highlights from that conversation include the following:

- NACOLE does not necessarily recommend any particular model, but instead prefers to support whatever model works best for each community
- There are opportunities for boards of this nature—regardless of the model—to assist with community education on police practices, policies, accountability, and transparency
- There is an emphasis on moving toward more proactive models that review and monitor systems to provide assistance before problems occur
- Effectiveness of these models is improved when they have exercisable authority and those to whom the entity reports are expected/required to respond to them
- Allowing the board to have a closed session without public or other staff present, following review and discussion of an IA case, supports the independent nature of these entities
- Low complaint volume can be an indication of many things, including a high degree of professionalism; it can also indicate low community confidence in the process, and it is important these entities monitor these perspectives

Freedom to Thrive

As mentioned, BerryDunn also reviewed the FTT report. For CPOC, this included a review of the independent oversight findings on pages 4-5 of that report. BerryDunn will not elaborate on the details of the independent oversight review presented in the report but notes that the yes/no questions and answers provided appear to accurately reflect the nature and structure of CPOC as it currently exists.

BerryDunn has no opinion on the specifics of the noted findings and in fact, BerryDunn made very similar observations. However, the independent oversight section of the report presumes that the Village favors a model that conforms to the characteristics provided and assessed in that report. Ultimately, it is up to the Village to determine the model it wishes to use. A more appropriate analysis, then, would include a comparison of whether the new model—whatever that might be—is meeting the foundational standards and expected outputs.

Opportunities

Like NACOLE, BerryDunn does not promote one model over another. More importantly, the model should support community values and needs, and encourage overall professionalism. Regardless of the approach, it is important for the entity—in whatever form—to have a clear role and mission, and to have the requisite tools and structure to be effective.

Although this list is not all-inclusive, the Village and OPPD should consider the following areas for revision of the CPOC ordinance/charter:

- Include a feedback opportunity for CPOC to make recommendations to the OPPD on suggested policy or procedural changes, and/or in-service training, in response to observed conditions or patterns from community complaints or investigations
- Include a provision for an opportunity to request the chief of police revisit complaint dispositions and/or proposed discipline, based on specific articulable facts or evidence
- Include an option to request the chief of police conduct additional investigation into a complaint, based on specific articulable facts or evidence
- Provide the ability to review any or all cases in an executive session of the CPOC, without the presence of police or non-CPOC personnel
- Add a training requirement for all CPOC board members that must minimally include training on officer rights and due process rules for internal affairs (IA) investigations, and a review of OPPD policies and practices for IA complaints
- Provide access to all policies, rules, regulations, collective bargaining agreements, and any other documented operational guidelines pertinent to the complaint and findings
- Provide CPOC with monthly reports of all citizen inquiries and/or complaints, along with a summary of each, regardless of whether the inquiry resulted in a formal investigation, so CPOC can monitor intake and investigation timing
- Conduct timely notification of the receipt of all citizen inquiries, regardless of whether the inquiry will result in a formal investigation
- Include an appeal process, should the need arise, if CPOC and the chief of police do not agree on a proposed policy, procedural, or training recommendation, or on a request for reconsideration of a disposition or proposed discipline or additional investigation

IV. Media

The OPPD does not currently have a full-time or dedicated public information officer (PIO); the chief of police or designee is the official spokesperson for the department. The OPPD routes daily public information functions through the Village Communications Department. Typical PIO responsibilities include, but are not limited to, the following:

- Assisting news media personnel in covering routine news stories, and at the scene of incidents with department involvement
- Being available for on-call responses to the news media
- Preparing and distributing news releases on the department's significant activity
- Arranging and assisting with news conferences

- Coordinating and authorizing the release of information about victims, witnesses, and suspects
- Managing communication during a crisis situation
- Coordinating and authorizing the release of information concerning confidential agency investigations and operations, only after approval of the chief of police
- Developing procedures for releasing information in incidents involving multiple government agencies
- Coordinating approval of content for the Village/OPPD for publications or promotional materials
- Monitoring the department's social media platforms

Each of the above-listed items helps ensure appropriate community messaging and improves overall transparency. Upon inquiry, staff at the OPPD described the department's relationship with local media as favorable, noting that the department has worked closely with area media and has worked to be responsive to media requests for information.

Social Media

The OPPD uses a variety of social media to communicate with the public, including Facebook, Twitter, Instagram, and YouTube. Posting to these platforms is typically done through the Village Communications Department. Staff who have relevant material to post can forward applicable content to the Communications Department for addition to one or more of the sites.

Despite the presence of these accounts, the lack of a designated PIO has resulted in intermittent and inconsistent use of these resources. Although the OPPD used to have an internal resource who could post to the social media sites, that person has changed roles and is no longer performing this function.

Overall, the OPPD could benefit from developing a comprehensive plan to engage multiple formats, in their most effective manner, to help ensure robust communications with the community. This might include designating new internal resources who are authorized to post to various social media sites. The social media and communications plan should be developed collaboratively with the Village Communications Department. It should outline the use of social media to promote internal and external communication and transparency in a manner that reinforces department mission, vision, and values, as well as guiding policing strategies.

V. Problem Solving

As noted above, the OPPD engages in deliberate relationship-building and community engagement to address underlying problems that manifest in crime and negative impacts of community feelings of safety. The OPPD has an opportunity to increase its organizational and individual understanding of formal problem-solving processes and truly collaborative community

policing. It is clear to BerryDunn that the core values and philosophy of the OPPD position itself ready to leverage additional training and exposure to these methods.

To illustrate the types of COP efforts the OPPD engages in, BerryDunn asked the department to identify some problem-solving examples that demonstrate its COP and POP efforts in working with disaffected populations and community problem solving.

The first example provided described a motor vehicle crash involving a four-year-old pedestrian in a school zone. The child, who was walking with his father and siblings, stepped into the street and was struck by a vehicle. The driver was not traveling at an excessive speed but did fail to yield to the child in the crosswalk.

The OPPD responded by assigning additional personnel to the school during arrival and dismissal times and worked with the school to develop a traffic safety plan. That plan included education of parents on safe drop-off zones, adding specific patrols by the OPPD, and requesting a crossing guard. The OPPD also met with the school to assess the plan and outcomes and has assigned a sergeant to monitor the situation going forward.

The second example provided was the example BerryDunn has previously mentioned in this chapter. The department provided BerryDunn with a memo that detailed its actions in response to and subsequent to the shooting incident. Again, BerryDunn had an opportunity to observe some of the OPPDs actions first-hand.

Both of these solutions provide strong examples of COP/POP efforts by the OPPD, and they serve as evidence of the department's efforts in its ongoing pursuit of these philosophies.

VI. Community Survey/Feedback

BerryDunn utilized several mechanisms to solicit community feedback regarding the OPPD, including a three-statement online survey, community stakeholder interviews, professional stakeholder interviews, and a community town-hall-type forum. Feedback varied within the different forums, and at times was not consistent. The online survey asked the respondents to provide feedback on the following:

1. Describe something the organization does particularly well.
2. Describe an area in which you feel the organization could improve.
3. Please use this section to explain any of your choices, and/or to express your view on any topic not covered.

Analysis

BerryDunn received approximately 187 community responses to the online survey. Because there were three prompts and 187 surveys were completed, there was a possibility of 561 responses. Not every respondent answered all three prompts, so the actual number of responses was substantially less than 561. The available responses from the 187 respondents

did, however, provide a significant amount of qualitative data with which to identify some common themes about community perceptions of the OPPD.

The survey responses included positive feedback, critical observations, and—notably—specific suggestions for improvement. This review will summarize the survey responses into common and related themes to provide enhanced clarity regarding community perception and feelings about the OPPD.

Professionalism, Responsiveness, and Police Service

Survey respondents frequently and strongly expressed satisfaction with the manner with which the OPPD performs patrol services and responds to calls for service. This was the most common feedback theme by far, with more than 50 responses touching on some aspect supporting this theme. In particular, respondents pointed out that the OPPD is very responsive to requests for service and provides quick response times. There were only a few responses specifically referring to community-oriented policing, problem-oriented policing, or related topics such as community engagement, but several responses did indicate positive community engagement and effective investigative follow-up. The comments in this theme were overwhelmingly positive and complimentary, but a few comments did indicate rudeness by OPPD members. Several respondents also raised concerns about how police responded to community members of color.

Equitable Policing and Response to Black Residents

The second most frequent feedback theme amongst respondents was about how the OPPD responds to community members of color and the manner in which police services are provided. The responses included indications that black residents, in particular, receive inequitable attention and unfair enforcement from the police. A specific suggestion indicated a need for more cultural sensitivity training.

Communication

The survey included multiple responses complimenting the OPPD on its active communication style. Other responses included a desire for more transparency, including periodic meetings with the chief of police to discuss OPPD data.

RBO/NRO Program

The RBO/NRO program was a source of many positive comments, including descriptions of how the program supports the traditional tenets of community policing. Responses indicated a desire for even more of this type of policing, including expansion of the program, more walking and bicycle patrol, and increased community engagement.

Crime, Safety, and Enforcement (including Traffic)

Respondents frequently indicated concerns about crime, particularly carjackings and robberies, with more than 20 responses addressing this theme in some manner. Some respondents called

for more aggressive enforcement to address public safety concerns (including traffic safety), while others expressed concern, as noted above in the theme about equitable policing, that enforcement is sometimes conducted inequitably.

Staffing Levels

Several responses indicated a desire that the department increase staffing levels, while other responses called for reducing or defunding the police altogether. A few responses specifically suggested increasing staffing by increasing the RBO/NRO program. Other budget-related comments included a need to improve facilities.

Civilianization

One of the specific observations noted in several responses was that the department uses sworn offices to perform services that non-sworn professionals could provide at less cost, while freeing up sworn officers to respond to crime and related calls for service.

Conclusion

The quantity and quality of responses to this survey indicate that the Village enjoys a well-informed community network that includes many people who care deeply about the community, its safety, and the manner in which it receives police services. The inclusion of observations about positive aspects of the OPPD—often from the same respondent with critical observations—reveals an honesty and sincerity about perceptions of the department. This survey produced meaningful information that helps illuminate several themes affecting department performance, including both positive attributes, areas for improvement, and areas that combine some aspects of both. Reponses also provided some specific observations and suggestions that will contribute to meaningful overall agency assessment and will assist in the production of effective recommendations for performance enhancement.

VII. Impartial Policing and Race Equity

Recent events underscore the challenges involved in policing a diverse society. They bring to light the need for law enforcement to engage in policing practices that embody the principles of procedural justice, and demand actions and behaviors by officers that ensure fair, impartial, and respectful treatment for everyone.

A key element of this project for the Village involved conducting a race-equity audit, covering numerous vantage points, including reviewing impartial policing data, soliciting community perspectives, interviewing OPPD personnel, and examining ordinance enforcement. This section outlines BerryDunn's observations.

Social and Procedural Justice

In the recent past, community members have increasingly taken to the streets nationwide to demand what they deserve as a *starting point*: social and procedural justice. Social justice is an essential component of healthy, effective communities. It is based on a fair and just relationship

between individuals and society. Social justice is distinguished by four foundational concepts across a spectrum of basic human needs such as wealth, education, healthcare, safety, opportunities, and privileges:

- Equity
- Access
- Active participation
- Individual rights

Social justice demands that those in the community feel safe—including feeling safe from the police. Feeling safe starts with procedurally-just policing. Any reform efforts must start with an honest acknowledgement of the past and a commitment to improve future performance. Police departments should commit to principles and concepts that share a commitment to the fundamental belief that policing is accountable to the community for its existence, its purpose, and its approaches, and that those approaches should support the welfare of the community as its priority in a fair, equitable way. All policing efforts must be socially and procedurally just and directly accountable to the people who empower the police in the first place—the community.

Procedural justice in policing is the principle that the community's willingness—individually and aggregately—to accept the actions of the police, obey laws, participate in the criminal justice system, and partner with law enforcement to reduce crime and disorder is dependent on the acceptance of policing actions as fair and equitable. Procedural justice consists of four primary pillars:

- Belief in the fairness and equity of the system and processes
- Transparency in actions and communication
- Opportunities for voice and agency (control or influence)
- Impartiality in decision-making

When conducting an operational study—such as the one BerryDunn is undertaking for the Village—policing strategies, specialized training, and operational standards and practices related to impartial policing and procedural justice are examined. Based on a review of the relevant data and information, BerryDunn found that although the OPPD has a good baseline of policies, procedures, and training in place with respect to impartial policing and procedural justice, opportunities for improvement exist.

Community Survey and Forums

BerryDunn developed a DEI survey for the community that was promoted by the Village through its various media platforms. The survey was provided through SurveyMonkey and included eight questions relating to diversity and race equity issues. Sixty community responses were recorded through this process. The following thematic review of those responses is provided without commentary by BerryDunn. Note that some sections contain conflicting themes.

Question #1: What is the Oak Park Police Department doing well in recognizing, understanding, and acting upon DEI issues within the department and the community? In what ways could it improve?

- Theme 1: OPPD understands the importance of diversity and treats all people fairly.
- Theme 2: OPPD needs improvement around DEI strategies and to engage organizations that have done the work that demonstrate inequities in police encounters.
- Theme 3: OPPD needs to improve community engagement with communities of color.

Question #2: Recent high-profile incidents, like the murder of George Floyd (and others), have exposed a deep trust divide between law enforcement and diverse communities. What actions have you observed the Oak Park Police Department taking to bridge that divide? What are some areas for improvement?

- Theme 1: OPPD is making attempts to bridge the divide through diversity, communication, and community engagement.
- Theme 2: OPPD should be given more training, but do not expect officers to be social workers.
- Theme 3: OPPD needs to do more targeted outreach to groups like ROYAL and other communities impacted by law enforcement.

Question #3: What does an authentic and transparent relationship look like between the Oak Park Police Department and the diverse residents it serves?

- Theme 1: Work on equity and culture internally within the organization and acknowledge the issues of trust within communities of color.
- Theme 2: Intentional engagement requires walking the neighborhoods and getting out of squad cars, and regular engagement on both sides of these issues.
- Theme 3: Improve intentional engagement with communities of color and ask them how to build an authentic and transparent relationship.

Question #4: Describe how the community is currently (or should be) involved in building trust and transparency between the Oak Park Police Department and the community, particularly with diverse communities.

- Theme 1: OPPD should continue to engage with diverse communities in spaces where people of color feel safe.
- Theme 2: OPPD should provide training and support officers to do their jobs.
- Theme 3: OPPD should continue to try to initiate ways to build trust and transparency with diverse community.

Question #5: In what ways have you observed the Oak Park Police Department working to develop relationships with diverse members of the community (e.g., racial, ethnic, and/or LGBTQ+)?

- Theme 1: OPPD does a good job of developing relationships and that includes attending community events and block parties. The OPPD should continue this type of engagement.
- Theme 2: OPPD should treat all people fairly regardless of race, ethnicity or sexual orientation.

Question #6: Have you personally experienced or witnessed discrimination (i.e., unfair, negative, or adverse treatment) by the Oak Park Police Department, based on one or more aspects of the background or identity (e.g., gender, age, ethnicity, or sexual orientation) of one or more of the involved persons? If so, please describe that experience.

- Theme 1: Most respondents did not report negative experiences or having witnessed discrimination by the OPPD.
- Theme 2: There were some examples of incidents both from a personal perspective or witnessed discrimination based on race, ethnicity, and sexual orientation.

Question #7: Do you feel that the Oak Park Police Department has a transparent process to hear citizen complaints, particularly complaints about DEI issues? Why or why not?

- Theme 1: It is helpful to have the CPOC to hear complaints; however, the process lacks transparency about the complaint process and how complaints are resolved, including a lack of communication with the complainant.
- Theme 2: Not all residents understand the complaint process; there should be more engagement on the process.

Question #8: Do you have anything else to add regarding the DEI efforts of the Oak Park Police Department?

- Theme 1: Overall the OPPD is a good department committed to diversity. There needs to be support for staffing and training and a culture where police are empowered to work with community.

The overarching themes from the survey demonstrate a clear tale of two cities, including a division of thoughts about the OPPD. Most comments were very positive and included a clear commitment to move forward as a community. There were strong sentiments that the implementation of an equitable and transparent police department is of great benefit to the entire community.

The number of respondents to this survey (60) was relatively small. As a result, the thematic outputs from the survey are not generalizable to the larger Oak Park community. In other words, BerryDunn cannot say with relative certainty that the views provided within the survey are consistent or representative of the Village as a whole. However, during the open forums

BerryDunn had with the community—both in large and small groups—the themes observed mirrored those outlined from the survey data. This consistency of data suggests a community desire to discuss, engage, collaborate, and attempt to resolve those issues that surround DEI-related matters.

OPPD Staff Interviews

In addition to soliciting community views on DEI, BerryDunn also interviewed approximately one dozen staff from the OPPD regarding their thoughts on the OPPD's DEI efforts, both internally and externally.

BerryDunn observed that staff across all interviews had a clear understanding of DEI and its value. Most characterized it accurately and noted that when done correctly, DEI establishes a proper culture for the entire organization. Additionally, several staff pointed out to BerryDunn that DEI has been a long-term focus of the OPPD, dating back to the inception of the CPOC and beyond. Staff relayed a common belief that the Village has had a long-term commitment to diversity and inclusivity, and that this has been an intentional philosophy for decades.

From an internal perspective, many expressed that the OPPD has been consciously monitoring and promoting DEI issues and making efforts to be inclusive. This includes deploying a police force that is representative of the community it serves (one of the initial focus areas for the CPOC). The OPPD formally supports the Illinois NAACP Principles and Values, and overtly states its support for DEI within its mission statement. Staff reported that these issues are commonly reinforced within the organization, but admitted that there may be a lack of direct DEI training within its FTO program.

Staff reported that externally, they have tried to address DEI issues through COP strategies, being transparent, and developing relationships with the community. Some whom BerryDunn interviewed explained that the OPPD receives few complaints about race or equity issues and offered this as evidence of their success in maintaining community relationships. Despite these sentiments, some indicated they are unclear what the community thinks and wants, and more importantly, some explained they were unsure why the public might have the impression that certain groups are affected disproportionately. Some suggested this could be the result of the national narrative—or perhaps some more significant challenges the City of Chicago is experiencing.

Although staff generally expressed a favorable view of the OPPD and its DEI efforts, both internally and externally, some also raised different perspectives. Some staff explained there have been instances where it appears someone has been promoted or treated differently, based on personal characteristics. Some also said that they would be reluctant to report an observed treatment issue, out of fear of repercussion or not being selected for a specialty assignment, and that there is an overarching attitude within the department that the strongest opinions should be everyone's opinions.

As with the community feedback, staff feedback from the OPPD includes opposing perspectives in various areas. The differing perspectives—both internally and externally—point to the

complexities of DEI and the importance of developing understanding and solutions. To improve DEI efforts for the Village and the department, BerryDunn recommends the OPPD develop a committee to work on and monitor various DEI initiatives, internally and externally.

Data Collection and Agency Practices

Another specific area of analysis for this project involved examining various IPD from the OPPD. This analysis was prompted, at least in part, due to the April 2020 FTT Report, as well as IPD published on the FTT website.[86] This information, which was previously provided to the Village, suggests disparate policing by the OPPD.

BerryDunn learned that the data published by FTT was obtained from OPPD records through a freedom of information act (FOIA) request. In reviewing the tables and figures assembled—reportedly from this data—BerryDunn observed apparent disparities in OPPD actions when examined through a racial lens.

In conversation with the OPPD, BerryDunn learned that the department collects IPD related to two specific officer actions: traffic stops and pedestrian stops, whether these are related to a specific CFS or as a field-initiated action by an officer. BerryDunn requested a copy of this data from the OPPD (from 2019-2021 and partial data from 2022) and received a dataset containing the information. BerryDunn also had the opportunity to speak with the individual who compiled the data on the FTT website, and that person graciously provided BerryDunn with a copy of the dataset used for those calculations. BerryDunn conducted extensive analysis on both sets of data and provides an explanation of the results of that analysis in this section.

Data Collection

In the Emergent Issues Memo provided to the Village early in this project, BerryDunn provided specific recommendations regarding the collection of impartial policing data and all non-consensual police contacts. Although the OPPD has established policies and practices for collecting impartial-policing racial profiling data on traffic stops and other non-consensual police contacts, in conversations with OPPD staff, BerryDunn has determined that this data is not being collected consistently, and there is a lack of clarity among staff on this policy and how it is applied.

Best practices for impartial policing suggest that police agencies should collect specific contact data to support ongoing monitoring of equitable policing practices (this is a requirement in Illinois). To support this, the OPPD should clarify its impartial policing data collection policies, provide training to officers on their application, and monitor compliance.

In addition, BerryDunn has learned the OPPD does not collect and record subject and incident data in its RMS on all police-related contacts (including calls for service), which is an industry best practice. Although some of this data is reported through notes added to the computer aided

[86] https://www.freedomtothriveop.com/blog

dispatch (CAD) record, this data is not searchable, it cannot support monitoring of police-subject contacts in furtherance of impartial-policing practices, it does not support intelligence-led-policing (ILP) or criminal investigation efforts, and it makes compliance with freedom of information act (FOIA) requests more difficult.

Accordingly, in addition to developing clear policy and expectations on the collection and recording of impartial policing data, the OPPD should develop and implement a policy and practice for collecting subject and incident data on all police-related contacts for entry into RMS.

Data Analysis

Disparate policing is generally defined as treating people differently because of their membership within a particular class (e.g., race, ethnicity, gender, sexual orientation). However, it is important to note that disparate policing is intentional, similar to biased policing, which involves intentional discrimination in police practices, based on bias or prejudice. These definitions differ from disparate impact, which suggests outcomes that disparately affect one or more groups based on class membership. To be clear, disparate policing—an intentional process—can produce disparate impact. However, it is possible for groups to experience disparate impact based on numerous factors, which need not include intentional actions by the police which cause them.

Because disparate impact is often associated with and calculated based on demographics, BerryDunn has repeated Table 5.1 below. This table provides current demographic estimates for the Village, based on 2021 data.

Table 5.1: Community Demographics (Table 1.1 repeated)

Community Demographics (2021)	Total	Percent
White	34,423	66.07%
African American	9,612	18.45%
American Indian and Alaska Native	147	0.28%
Asian	2,657	5.10%
Native Hawaiian or Pacific Islander	63	0.12%
Multiple Races	3,832	7.35%
Other Single Race	1,368	2.63%
Total	**52,102**	
Hispanic or Latino	4,937	9.48%
Not Hispanic or Latino	47,165	90.52%

Source: U.S. Census Bureau

As indicated above, BerryDunn performed numerous calculations on the IPD provided, and BerryDunn developed several tables and figures from this data. BerryDunn will summarize much of this data in this section; however, the tables and figures used can be examined in detail in the SDI report. Additionally, because there are two types of IPD collected by the OPPD, traffic stops and field contacts, BerryDunn will provide an overview of these data in two sections. BerryDunn will provide this overview without additional commentary, but will summarize key observations at the end of each section.

Traffic Stops

Of the traffic stops conducted by the OPPD, 49.53% involved Black drivers, with 31.29% involving White drivers, and 16.55% Hispanic drivers.[87] The primary reasons for traffic stops involved equipment, license plate/registration, and moving violations.[88] The bulk of traffic stops (76.34%) involved license place/registration and moving violations.[89] The distribution of these violations is proportional irrespective of race.

Looking at the percentage of citations issued by race and age, BerryDunn did not observe any significant variations by race. The frequency of citations issued was highest for American Indian drivers, and the lowest for Asian drivers. Black drivers were the second lowest, with White drivers being third lowest. The frequency range for citations issued was from 12.68% to 25.76%.[90] The vast percentage of traffic stops involved adults, with only 2.6% involving juveniles.[91] Over the period studied, there were only 464 traffic stops reported involving juveniles.

BerryDunn also examined the number of traffic stops by gender and race. Male drivers represented the greatest portion of stops, regardless of race.[92] The percentage of male versus female drivers was unremarkable.

Due to the patrol beat structure of the OPPD, it was difficult to examine traffic stops by race and beat. This is because some reporting categories cross more than one beat and it was not possible to separate these data. BerryDunn examined these data, and although there were some zones that had a comparatively low number of traffic stops, there were no clear variations in traffic stops by race, based on community geography.[93]

BerryDunn also examined traffic stops that resulted in a search (not including incidents involving an arrest), whether it was a search of the vehicle, one or more persons, or some other property belonging to one of the involved parties. From 17,217 traffic stops, BerryDunn observed 276

[87] SDI Figure 5.1
[88] SDI Figure 5.2
[89] SDI Table 5.5
[90] SDI Figure 5.3
[91] SDI Figure 5.4
[92] SDI Figure 5.5
[93] SDI Figure 5.6

search events, or 1.6% of all traffic stops. Of the 276 searches, 75.72% involved Black individuals.[94] It is important to put this number into context. Black drivers represent 49.53% of all traffic stops.[95] If searches related to traffic stops occurred proportionally to the percentage of stops, Black drivers would have been searched 137 times, as opposed to the 209 searches that occurred. Additionally, given that White drivers represent 31.29% of all traffic stops, a proportional level of searches for White drivers would have been 86. Instead, White drivers were searched 34 times, representing 12.21% of traffic stop searches not resulting in an arrest.

Because the traffic stop data initially provided by the OPPD did not include traffic stops resulting in an arrest, BerryDunn requested this data separately. Notably, this data was difficult to extract from the OPPD RMS, which is another example of functional challenges with that system.

BerryDunn noted that similar to the search data, the arrest data is proportionally inconsistent, with Black drivers representing 78.34% of arrests,[96] which is significantly greater than the percentage of traffic stops involving Black drivers. Again, White drivers make up only 13.56% of arrests, despite being involved in 31.29% of all traffic stops. Juvenile arrests reveal a similar disproportional pattern,[97] although there were only nine juvenile arrests reported from 2020 through mid-2022, and these small numbers do not provide for significant analysis.

In looking at the arrest data resulting from traffic stops, BerryDunn also isolated the top eight arrest categories, each of which had a cumulative total of at least 10 arrests across the three-and-a-half-year period examined. Five of these categories involved 158 arrests, or 29.76% of those 531 reported.[98] Each of these five categories involve violations that are typically enforced non-discretionally.

Traffic Stop Data Review Summary

One of the many challenges in analyzing traffic stop data is the propensity to compare IPD directly against community demographics. This presents a challenge because community demographics do not necessarily translate directly to the demographics of those driving in or through a community. Because Oak Park has a significant volume of transient drivers (those who live in other areas) who pass through the community on a regular basis, the demographics of the Village cannot be unilaterally assigned as a representation of the motoring public. Accurately determining the demographic of drivers within Oak Park would require taking physical counts and doing so would be cost-prohibitive. However, because much of the traffic stop data BerryDunn evaluated indicates a disproportionality when compared to the community demographics of Oak Park, BerryDunn conducted additional analysis to further examine this condition.

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[94] SDI Figure 5.7
[95] SDI Figure 5.1
[96] SDI Table 5.1
[97] SDI Table 5.2
[98] SDI Table 5.3

Demographics

By their nature, traffic stops are discretionary, and isolating what prompts an officer to conduct a traffic stop is an elusive task, which, for many, is at the heart of this discussion. Conversely, motor vehicle crashes are not a discretionary occurrence; people do not decide where or when to become involved in a crash. BerryDunn learned that the Village has a comparatively high rate of motor vehicle crashes, particularly for a community of its size. Based on data provided to BerryDunn, nearly 15,000 individuals were involved in motor vehicle crashes between 2017 and the middle of 2022, when this data was collected.[99]

Traffic stop data does not generally include race data for drivers (unless a department specifically collects it; the OPPD does not). However, driver data collected by the OPPD includes the zip codes of those involved, and it is possible to utilize demographic data related to zip codes to better understand the constituency of those using the roadways within the Village. BerryDunn collected crash data from the OPPD and learned that 16 zip codes represent 67.20% of the drivers involved in these crashes during the period evaluated. BerryDunn consulted two different sources of demographic data related to zip codes and developed Table 5.2.

The data in Table 5.2 presents a very different perspective on the demographics of the drivers who may be operating within or traveling through the Village. Although Table 1.1 indicates that Whites make up 66.07% of the population, with Blacks representing 18.45%, Table 5.2 indicates a varied demographic distribution for motorists involved in crashes during the period studied.

Table 5.2: Motor Vehicle Crash Demographics by Zip Code

	White	Black	Am. Ind/AK	Asian	Pacific Is.	Other	Two or More	Total
Pop. Totals	**302,060**	**229,239**	**4,237**	**12,125**	**306**	**149,341**	**19,827**	**717,135**
Percent	**42.12%**	**31.97%**	**0.59%**	**1.69%**	**0.04%**	**20.82%**	**2.76%**	

Source: unitedstateszipcodes.org

Pop. Totals	**279,382**	**194,886**	**2,940**	**13,869**	**265**	**161,237**	**39,535**	**692,114**
Percent	**38.96%**	**27.18%**	**0.41%**	**1.93%**	**0.04%**	**22.48%**	**5.51%**	

Source: data.census.gov (zip code tabulation area - ZCTA)

To be clear, BerryDunn is not drawing any particular conclusion regarding the data in Table 5.2. Despite the data provided, it is impossible for BerryDunn (or anyone) to determine the demographic of drivers from this dataset. Still, Table 5.2 is provided to illustrate the complexities associated with this type of analysis, and to suggest that it is not appropriate to strictly apply the community demographics of Oak Park against the traffic stop data evaluated. In fact, according to the National Institute of Justice (NIJ), “social scientists now disregard comparisons to the

[99] SDI Table 5.4

census for assessing racial bias."[100] The NIJ also notes that "in addition to questions about bias in the decision to initiate a stop…", those examining traffic stop data to identify possible bias should examine "other aspects of the traffic stop: the length of the stop and the decision to cite, search, or use force."[101]

The above information is not intended to dismiss the consideration of race demographics as an element for examination and consideration in looking for bias in traffic stops. What is clear is that understanding the actual demographics of drivers in any geographic area is problematic.

Citations and Arrests

As the NIJ points out, one mechanism for evaluating bias in traffic stops involves examining the results of those stops, including whether a person was warned, cited, or arrested. Based on the citation data reviewed, once stopped, citations are issued within a range (12.61%–25.37%) that does not favor White drivers over other races or penalize Black drivers more frequently than other races.[102] Additionally, although the number of juvenile offenders within the dataset is small, citation percentages for adults and juveniles are nearly identical for Black, Hispanic, and White drivers. BerryDunn notes here, however, that 22.22% of the citations issued did not contain an identifier within the race field. Accordingly, if accurately reported, it is possible these percentages could change, and potentially substantially so.

Looking at the arrest data provided, BerryDunn notes that of the 531 arrests reported by the OPPD, 78.34% involved Black drivers, while 13.56% involved White drivers.[103] If arrests were proportional to stops, the number of arrests of Black drivers should have been 242, instead of 416 as reported. For White drivers, arrests should have totaled 153, instead of the 72 reported (these calculations exclude arrests of Asian and Hispanic drivers).

These data clearly show a greater rate of arrest for Black drivers during traffic stops. However, the primary violations resulting in arrest include warrant arrests; suspended, revoked, or no driver's license; operating a motor vehicle without insurance; and DUI.[104] Generally, these offenses represent violations for which officers are not authorized to exercise discretion. Essentially, regardless of one's race, if a person is stopped for one of these reasons, they are likely to always be charged. BerryDunn notes here that OPPD does not have the option of issuing a citation in lieu of arrest for these violations.

BerryDunn does not have the data to determine whether all drivers who committed these violations were arrested. However, assuming the OPPD has not engaged in discretionary

[100] https://nij.ojp.gov/topics/articles/racial-profiling-and-traffic-stops
[101] ibid
[102] SDI Figure 5.3
[103] SDI Table 5.1
[104] SDI Table 5.3

deviations in enforcing these violations, then any variations in arrest totals can be attributed to the number of these violations occurring among the sample group of those stopped.

Searches

In contrast to arrests for non-discretionary traffic offenses, searches always involve a discretionary decision by the officer to conduct one. The search data BerryDunn reviewed involved traffic stops in which a search was conducted, but no arrest was made (if there had been an arrest, a search would be legally justified, and this information would have been included in the arrest dataset BerryDunn examined). As noted previously, if searches were requested proportionally to the percentage of traffic stops by race, the totals would be very different from what was reported. In short, the rate of searches of Black drivers/occupants is significantly higher (76.72%) than the percentage of traffic stops involving Black drivers (49.82%).

As BerryDunn described earlier in this section, determining what prompts an officer to conduct a traffic stop on one vehicle as opposed to another is difficult. Searches, on the other hand, should be based on specific articulable facts and circumstances that prompt an officer to engage and/or request a search of a vehicle, person, or the person's property. Consent searches, those that involve a police officer requesting consent of an individual to search the person or any property under his or her control, have long been used by the police as a tool to detect crime. In fact, many officers (around the country, not necessarily in Oak Park) regularly use pretext stops (legal stops for minor infractions) as a mechanism to proactively look for guns, contraband, or stolen property, for example.

Although pretext stops and consent searches are practices that frequently result in legitimate arrests for a variety of offenses, their use has fallen under significant scrutiny in recent years, due to the potential for abuse and biased policing. Accordingly, many police departments have created accountability around these stops, which do not necessarily prohibit their use, but which provide mechanisms to help ensure appropriate application of these enforcement strategies, while simultaneously reducing the potential for biased policing in their use. BerryDunn is recommending such an approach, and those recommendations are outlined at the end of this chapter.

Field Contacts

Based on BerryDunn's request, the OPPD provided BerryDunn with a dataset that included field contacts from 2019 through mid-2022. The field contact data provided included a total of 566 incidents during that period. Field contact data includes self-initiated subject contacts by officers, as well as subject contacts which occur subject to a CFS (e.g., suspicious person). As reported previously in this section, BerryDunn noted early in this process that the dataset appeared incomplete and underreported. Based on BerryDunn's calculations from data provided by the OPPD, patrol staff filled roughly 16,500 patrol shifts during this 3.5-year period. Noting the imbalance between the number of field contacts and officer opportunities, BerryDunn inquired further of the OPPD. In short, BerryDunn learned that staff were not correctly and

consistently capturing this data, most likely due to changes in the process of collecting this data, and a misunderstanding among staff as to when collection was required.

BerryDunn informed the OPPD of this issue early in the project, and immediate steps were taken to correctly collect this data going forward. However, BerryDunn's analysis is restricted to the dataset provided. It is notable that in evaluating the data provided by FTT for 2015-2018, the OPPD recorded 597 field contacts, a very similar number compared to the data BerryDunn received for the more recent reporting period. Again, as mentioned, BerryDunn will report on the data provided by the Village, as well as the dataset provided by FTT.

It is also worth noting here that field contacts related to a CFS generally carry an expectation that an officer take action or make contact with any person observed who the officer may reasonably believe is involved in the CFS that prompted the response. Like traffic violations that demand action, there is an industry norm and expectation that officers make contact with persons who may possibly be involved; BerryDunn will expand this conversation further later in this section. Conversely, self-initiated field contacts by officers are wholly discretionary, and occur based on a specific decision by officers to act. This is an important distinction, and again, BerryDunn will elaborate further on this later in this section.

Looking at all field contacts by race (for 2019-2022), BerryDunn observed that Blacks represented 74.03% of the contacts, with Whites making up 13.60%. Overall, persons of color represented more than 76% of these field contacts.[105] This data is consistent with the FTT data (for 2015-2018), which showed 79.90% of field contacts involved Blacks, and 12.23% involved Whites.

BerryDunn evaluated current field contacts by age and noted that 87.3% involved adults, as compared to the FTT data, which indicated 89.8% of field contacts involved adults.[106] When examined by gender, current field contact data showed approximately 95% involved males, with Black males making up 72.36% of that total. The FTT data had a similar gender breakdown, with Black males representing 76.72% of the total.[107]

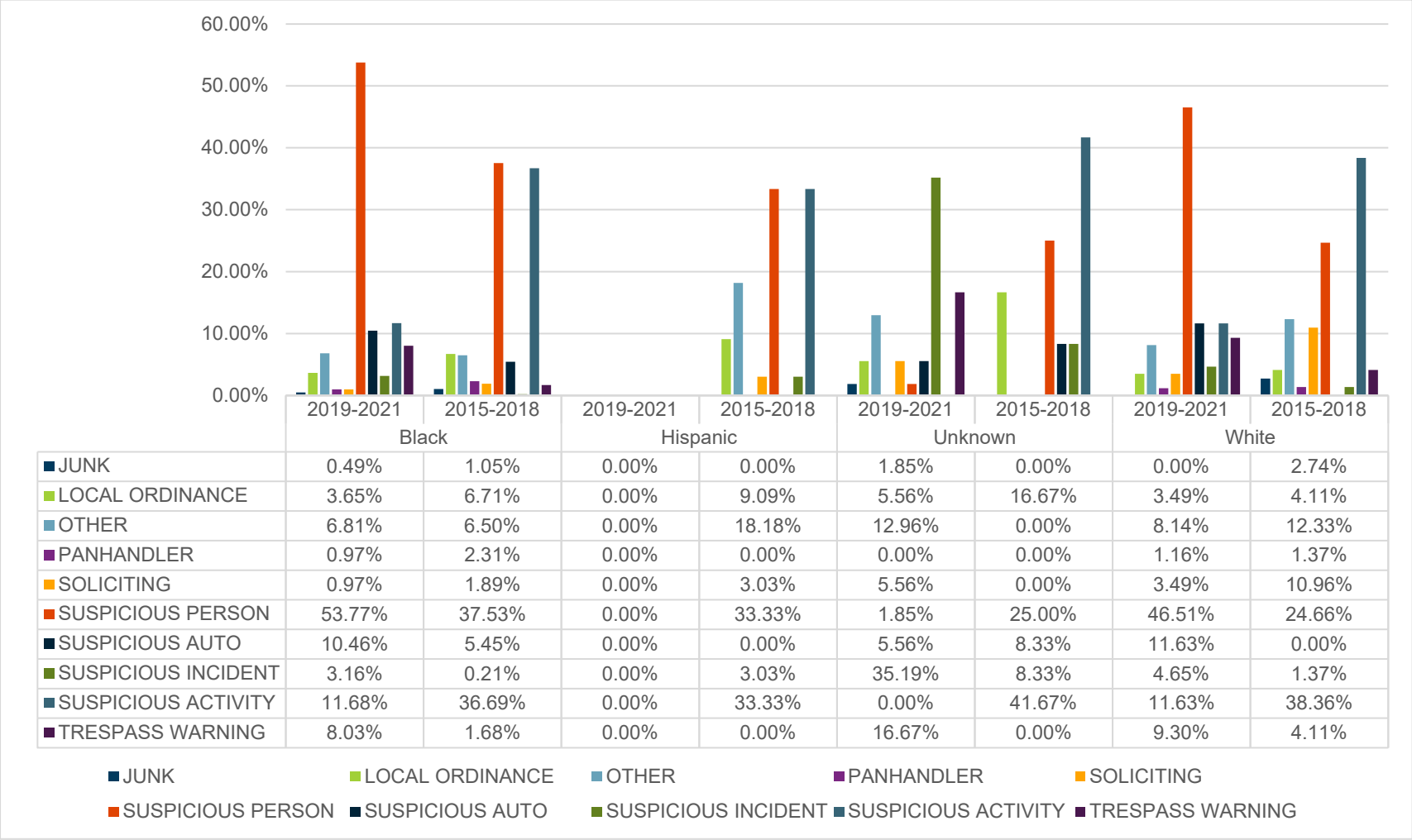
To better understand the reason for the field contacts, BerryDunn collected the reason codes from both sets of data (current and FTT) and created Tables 5.1 and 5.2, each of which include 10 reason codes. Table 5.1 reflects the breakdown of reasons for field contacts for each race and compares these to the FTT data. Although there are some coding variations, suspicion is the dominant reason for all field contacts. It is also notable that for non-suspicion reasons (junk, ordinance, panhandling, soliciting, and other), Blacks are contacted at a lower rate than Whites; this is true for both datasets.

In looking at the reasons for all field contacts in Table 5.2, and separating these by race, 74.32% involved Blacks and 15.55% involved Whites for the current data, with 79.90% contacts

[105] SDI Figure 5.8
[106] SDI Figure 5.9
[107] SDI Figure 5.10

for Blacks and 12.23% contacts for Whites within the FTT dataset. Again, suspicious activity, however categorized, is the predominant factor for all field contacts.

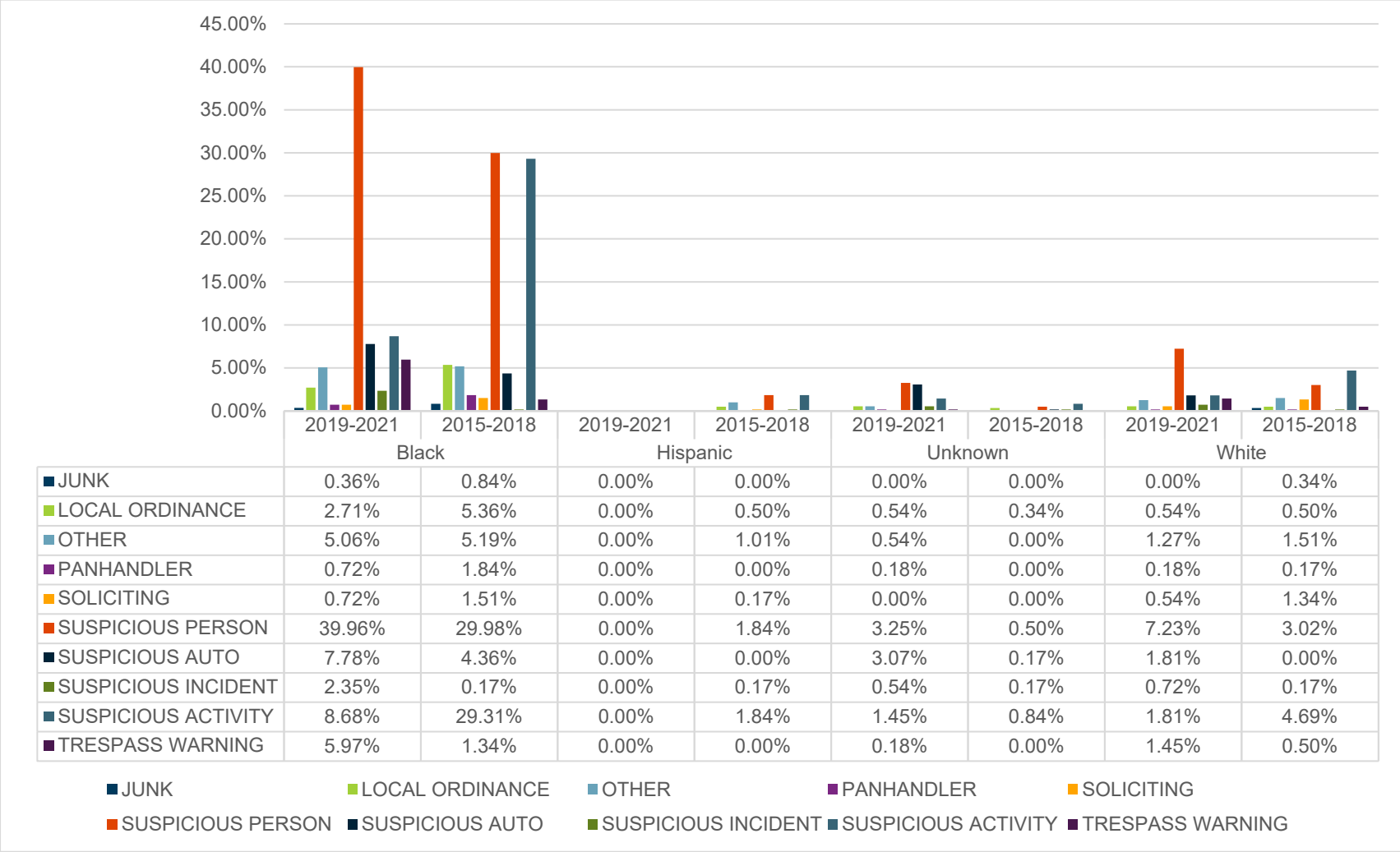
Figure 5.1: Field Contacts by Reason for Each Race 2019-2021 and 2015-2018 Comparison



	Black		Hispanic		Unknown		White	
	2019-2021	2015-2018	2019-2021	2015-2018	2019-2021	2015-2018	2019-2021	2015-2018
JUNK	0.49%	1.05%	0.00%	0.00%	1.85%	0.00%	0.00%	2.74%
LOCAL ORDINANCE	3.65%	6.71%	0.00%	9.09%	5.56%	16.67%	3.49%	4.11%
OTHER	6.81%	6.50%	0.00%	18.18%	12.96%	0.00%	8.14%	12.33%
PANHANDLER	0.97%	2.31%	0.00%	0.00%	0.00%	0.00%	1.16%	1.37%
SOLICITING	0.97%	1.89%	0.00%	3.03%	5.56%	0.00%	3.49%	10.96%
SUSPICIOUS PERSON	53.77%	37.53%	0.00%	33.33%	1.85%	25.00%	46.51%	24.66%
SUSPICIOUS AUTO	10.46%	5.45%	0.00%	0.00%	5.56%	8.33%	11.63%	0.00%
SUSPICIOUS INCIDENT	3.16%	0.21%	0.00%	3.03%	35.19%	8.33%	4.65%	1.37%
SUSPICIOUS ACTIVITY	11.68%	36.69%	0.00%	33.33%	0.00%	41.67%	11.63%	38.36%
TRESPASS WARNING	8.03%	1.68%	0.00%	0.00%	16.67%	0.00%	9.30%	4.11%

Source: Agency Provided Data (partial 2022 data is included in this figure)

Figure 5.2: Field Contacts by Reason for All Races 2019-2021 and 2015-2018 Comparison



	Black		Hispanic		Unknown		White	
	2019-2021	2015-2018	2019-2021	2015-2018	2019-2021	2015-2018	2019-2021	2015-2018
JUNK	0.36%	0.84%	0.00%	0.00%	0.00%	0.00%	0.00%	0.34%
LOCAL ORDINANCE	2.71%	5.36%	0.00%	0.50%	0.54%	0.34%	0.54%	0.50%
OTHER	5.06%	5.19%	0.00%	1.01%	0.54%	0.00%	1.27%	1.51%
PANHANDLER	0.72%	1.84%	0.00%	0.00%	0.18%	0.00%	0.18%	0.17%
SOLICITING	0.72%	1.51%	0.00%	0.17%	0.00%	0.00%	0.54%	1.34%
SUSPICIOUS PERSON	39.96%	29.98%	0.00%	1.84%	3.25%	0.50%	7.23%	3.02%
SUSPICIOUS AUTO	7.78%	4.36%	0.00%	0.00%	3.07%	0.17%	1.81%	0.00%
SUSPICIOUS INCIDENT	2.35%	0.17%	0.00%	0.17%	0.54%	0.17%	0.72%	0.17%
SUSPICIOUS ACTIVITY	8.68%	29.31%	0.00%	1.84%	1.45%	0.84%	1.81%	4.69%
TRESPASS WARNING	5.97%	1.34%	0.00%	0.00%	0.18%	0.00%	1.45%	0.50%

Source: Agency Provided Data (partial 2022 data is included in this figure)

BerryDunn also examined current field contacts by conveyance mode (bike, vehicle, pedestrian) at the time of the contact. BerryDunn examined this data by percentage[108] and by count.[109] One common report from Oak Park community members was that Black youth are frequently stopped while on bicycle. Due to the low number of total juvenile contacts within the dataset (72), BerryDunn did not examine conveyance mode by age. However, BerryDunn did observe that 13.66% of field contacts (75 occurrences) involved Blacks on bicycles, as opposed to 2.19% (12 occurrences) involving Whites on bicycles. The most common mode involved pedestrians.

Because some field contacts are case-related and others are not, BerryDunn examined field contacts that were not associated with a CFS.[110] BerryDunn notes here that of the current field reporting data evaluated, 270 were case-related, with 280 involving self-initiated field contacts. Of the non-case-related field contacts, 70.71% involved Blacks, with 15% involving Whites.[111]

BerryDunn also looked at the number of current field contacts by zone. The data reflects that the largest portion of field contacts occurred in zones 3-5, which represents the central and west central section of the Village.[112]

Searches

The last point of analysis BerryDunn performed on this data involved examining searches resulting from field contacts. Again, this data includes only those field contacts involving searches that did not result in an arrest. Of the 550 field contacts, 49 (8.91%) resulted in a search of one or more persons, a vehicle, or property belonging to one of the subjects. Of the search-related incidents, 32 (5.81 percent of all field contacts) involved a search that resulted from a self-initiated activity, not one that was related to a CFS. From this total, 56.25% involved Blacks, with 21.88% associated with White subjects.[113]

BerryDunn also examined the breakdown of the non-case-related searches resulting from field contacts.[114] The overall numbers within this dataset are relatively small (32 in total), reflecting less than one search per month over the period examined. However, persons of color represented more than twice the number of searches involving Whites.

Field Contact Data Review Summary

As BerryDunn has mentioned, the number of field contacts reported, whether from the current data or the FTT data, is small and clearly underreported. Again, BerryDunn reported this to the OPPD early in the project, and immediate steps were taken to collect this data more

[108] SDI Figure 5.11
[109] SDI Figure 5.12
[110] SDI Figure 5.13
[111] SDI Figure 5.14
[112] SDI Figure 5.15
[113] SDI Figure 5.16
[114] SDI Figure 5.17

consistently in the future. The FTT data did not include information on which incidents involved CFS as opposed to self-initiated field contacts, nor did it include information on conveyance modes or searches. Accordingly, BerryDunn could not cross-compare these data. However, BerryDunn found the current field contact and FTT data to be highly consistent in terms of the types of activity that prompted the field contact, and the percentage of contacts by race.

It is also worth noting that the OPPD only reported eight biased-policing complaints from 2019-2021.[115] As noted in the review of the CPOC, low complaint volume can be an indication of many things, including a high degree of professionalism. It can indicate low community confidence in the process, and it is important these entities monitor these perspectives. Monitoring IPD and department practices will be a key area for the OPPD moving forward.

Activity

One of the more compelling aspects of this data relates to the type of activity that has prompted the contacts, suspicion in particular, whether CFS-related or self-initiated. The term suspicion is an ambiguous term that is highly susceptible to interpretation, and potentially, an opportunity for biased-based policing. As a result, it is necessary to consider a different approach to suspicion-related events.

The policing industry has a tradition of responding when someone calls for assistance. Whether that call involves something service-related, or a crime, when the police are summoned, they respond. The blind adherence to this tradition has resulted in the police justifying all contacts with the belief that because they were called, they were compelled to act. Many CFS fall into this category; however, because of its ambiguous nature, suspicion is perhaps the most problematic.

When officers respond to a suspicion CFS, whether related to a person, vehicle, or other noted circumstance, they are often doing so at the prompt of a community member. Police generally operate from an assumption that a named reporting person is considered credible and that the person's motives are genuine (anonymous complaints are generally regarded with less credibility). Even if that is true, the report itself can be influenced by bias, in many forms, and if the police respond and act without verification, at some level, the actions of the police may result in a form of bias, even if it was not the police that initially prompted the contact.

To correct for this, the OPPD should categorize all suspicion incidents as having context or no context. Incidents with context are those in which specific behaviors, conduct, or circumstances are reported or observed that would lead a reasonable person or officer to conclude that the behavior is abnormal, unusual, dangerous, or possibly criminal, based on the totality of the circumstances and specific articulable facts. When information of this nature is provided, a police response and contact is likely warranted and appropriate (unless the police make immediate observations that render the report void or inaccurate).

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[115] SDI Table 5.5

Suspicion CFS (or officer-observed incidents) without context would include any situation in which there are no reported or observed specific behaviors, conduct, or circumstances.

BerryDunn recommends that the OPPD develop protocols around suspicion incidents with or without context, and train officers, non-sworn OPPD personnel, and dispatchers on these protocols. At a minimum, these protocols should specify:

- OPPD officers must have context in order to make a stop based on suspicion
- If context does not exist, based on initial observations or caller-reported information, OPPD officers shall not make contact
- If suspicious incidents are reported without context, OPPD officers should respond to the area, but should not make contact unless they are able to independently establish context
- OPPD officers must report on any suspicious contact or non-contact through the RMS

If an officer makes contact on a suspicious incident, whether observed or reported, the officer must document the contact in the OPPD impartial policing database.

Searches

As BerryDunn described earlier in this section, searches should be based on specific articulable facts and circumstances. This standard applies to all searches, not just those that prompt an officer to engage and/or request a search of a vehicle, person, or the person's property. Consent searches, those that involve a police officer requesting consent of an individual to search the person or any property under his or her control, have long been used by the police as a tool to detect crime. In fact, many officers (around the country, not necessarily in Oak Park) regularly use pretext stops (legal stops for minor infractions) as a mechanism to proactively look for guns, contraband, or stolen property, for example.

Although pretext stops and consent searches are practices that frequently result in legitimate arrests for a variety of offenses, their use has fallen under significant scrutiny in recent years, due to the potential for abuse and biased policing. Accordingly, many police departments have created accountability around these stops, which do not necessarily prohibit their use, but which provide mechanisms to help ensure appropriate application of these enforcement strategies, while simultaneously reducing the potential for biased policing in their use. BerryDunn is recommending such an approach, for both traffic stops and other non-consensual stops, and those recommendations are outlined at the end of this chapter.

Transparency

Although BerryDunn is aware the OPPD is working on an outward-facing platform for information sharing, this has been an area of concern raised by many members of the community. Providing ongoing and consistent information on a variety of operational areas can help improve community trust and overall public safety success.

To resolve this, the OPPD should develop a data sharing philosophy that proactively shares data with the Village to help inform the public, improve transparency, and build trust. The OPPD

should also create educational opportunities for the Village, to improve understanding of police operations and procedures and to create public awareness.

Data Monitoring

Given the national concerns over biased policing, it is an imperative for police agencies to monitor and evaluate its IPD on a regular basis. This review is intended to provide real-time information for department leadership, so that any concerning pattens or practices can be quickly identified – so that new strategies can be implemented to mitigate and reverse any patterns involving negative outcomes.

As reflected in this section, there are some patterns in the data that reflect patterns of practice that have the potential to create disparate impact for traditionally marginalized groups. BerryDunn has provided recommendations in this section that add various controls to adjust policing practices in an effort to reduce the potential for disparate impact. These adjustments and strategies should have a positive effect on these practices, and the disparity of data; however, once implemented, the OPPD will need to monitor the data on an ongoing basis to evaluate whether conditions have improved.

Accordingly, BerryDunn recommends the OPPD regularly monitor and evaluate its IPD to identify patterns that reflect possible bias. The OPPD should use the data to assist with development of strategies to correct possible biased policing patterns and monitor the data on an ongoing basis to evaluate the success of operational adjustments implemented to mitigate them.

Fair and Impartial Policing

One of the elements of this project involved presentation of successful measures to contribute to Fair and Impartial Policing (FIP), which have been accomplished in similar cities. FIP is a relatively new concept, training, and approach within the field of law enforcement. The concept of FIP began receiving national attention within the law enforcement community in 2015. According to some, a triggering event that prompted the popularity of FIP involved a shooting incident in Florida by George Zimmerman, who was not a law enforcement officer. Regardless of the fact that Zimmerman was a civilian, this event seemed to prompt interest in FIP. In recent years, FIP has gained additional attention, following a series of concerning events, including the murder of George Floyd.

The overall concept of FIP revolves around teaching policing officers how to deal with implicit bias related to racism within the industry/profession. The premise is that officers have an unconscious bias against minority individuals, most commonly Black/African Americans, within the United States. However, by extension, FIP applies to all BIPOC populations, particularly within large/urban centers. The concept of FIP emanates from research conducted in the 1950s related to bias:

> *The scientific foundation of FIP perspective comes from social psychologists who have been studying bias and prejudice since the 1950s. Their research findings tell us two*

important things: (1) there are differences between "explicit" and "implicit" bias, and (2) bias today is more likely to be implicit rather than explicit. (Fridell, L. N.D)

There is a current belief by many that law enforcement officers engage minority communities with more force, including a disparate frequency of lethal force. Although this belief is subject to debate, it has prompted a much richer and deeper conversation related to race, ethnicity, engagement, and interaction. In response to a series of policing challenges, including several high-profile police force incidents, President Barak Obama commissioned the 21st Century Policing Task Force, which provided a series of policy and direct recommendations for law enforcement leaders to engage to correct a range of industry challenges. The most relevant pillar to FIP within the task force report was Pillar One: Building Trust and Legitimacy on both sides of the police interaction.

The premise with implicit bias is an assumption that individuals are unaware of their individual biases, and these biases manifest in improper behaviors at an unconscious level. Although this concept has not been unilaterally adopted by law enforcement educators, trainers, or industry leaders, there is clear evidence that the notion of implicit or unconscious bias is present in human nature, and this is not restricted to the field of law enforcement. In fact, research suggests that implicit bias is present in virtually every domain within the world. It also worth mentioning that the issue of implicit bias is not restricted to White versus the BIPOC community. Implicit bias manifests through the dominant culture versus minority culture.

As an initial step in providing information on FIP in practice, BerryDunn interviewed Lorie Fridell, the founder of FIP. The conversation involved the nature of the program and how it is delivered, including the key points of the curriculum. Fridell explained the delivery of curriculum to commanders, supervisors, and line staff, targeting implicit bias, how it works, and how to interrupt the cycle. Other key aspects include providing tools for addressing bias, and strategic implementation of FIP processes and fundamentals.

During the conversation, Fridell indicated that a key for agencies to understand is how proactive policing can produce biased policing. It is important for agencies to identify the high-discretion activities that may produce disparities, and to put safeguards in place to counter and reduce biased policing.

BerryDunn asked Fridell directly about agencies that have successfully deployed FIP strategies. Fridell explained that there is little information on this and that although she has made efforts to collect data from prior clients, she has not had success in receiving this information. She explained further that FIP requires significant focus and attention, and that its overall success is predicated on these factors. It is unclear whether Fridell's clients have adopted FIP as an operational philosophy, and if not, this would likely impede demonstrable results. Despite this lack of data, Fridell points out that there is evidence to suggest that training on biased policing can positively impact officer behaviors.

Research

The following information provides a brief summary of additional research conducted by BerryDunn on key points related to FIP.

Unconscious or Implicit Bias

There is limited research specifically on point that demonstrates that law enforcement officers engage in unconscious bias. However, there has been significant correlational research completed within the fields of medicine, education, and pharmacology, along with social and psychological experiments, that demonstrate that this concept carries some veracity.

The topic of unconscious bias is not new; it has and is currently being researched in all areas of public and private sector engagement with BIPOC populations. The modern genesis for Implicit Bias is a 25-page paper written by Anthony Greenwald and Linda Krieger for the California Law Review, where the two researchers related racial bias and interactions with the criminal justice system, specifically discrimination law.[116] The primary premise is that:

> *…Science of implicit cognition suggests that actors do not always have a conscious, intentional control over the process of social perception, impressions formation, and judgement that motivate their actions.*

Although there is a lack of formal research to conclude that some officer actions are the result of implicit bias, there is anecdotal evidence to suggest this occurs. Regardless, this belief underpins FIP.

Use of Force

Within the field of law enforcement, the research suggests an over representation of use of force towards minorities. However, the research related to the use of force, and studies that specifically examine the applications of force, does not provide data that correlates implicit bias with higher force use rates on the BIPOC community. In short, there is little research that connects implicit bias within the application of use of force. At the same time, best practices in use of force training includes de-escalation training, either as a primary or sub-component of the training.

Training

In researching training vendors that provide impartial policing training, BerryDunn identified training being offered by Lexipol/Police-One on implicit bias. Additionally, as noted previously, there is an FIP policing website operated by Lorie Fridell, Ph.D., which has a litany of police trainers who appear to be mostly command-level executives.

Cost and Culture

The initial cost to the agency generally involves a one-time price for training everyone through a specialized vendor, or a per-seat pricing structure. There are some free limited trainings available, but these generally involve a basic overview, rather than something substantive that would allow for significant knowledge gain and cultural adoption. The overriding factor for FIP

[116] https://www.csueastbay.edu/dsj/files/docs/academic-research-articles/dsjguide-implicit-bias.pdf

involves implementing a cultural change within the department, to look at and adjust how officers interact with the public. Without a substantial recognition of the issues of implicit bias and FIP strategies, little change will occur within the organization.

The overall costs related to the change and implementation of FIP extend beyond the initial training. Developing and implementing FIP strategies and embedding and reinforcing these philosophies across the organization as a cultural norm will require a variety of steps. Those steps include policy development, ongoing training, monitoring and accountability, and constant reinforcement across the entirety of the organization.

Conclusions

Although FIP is a topic that law enforcement executives should be aware of, including how its concepts impact their specific agency, the presence of implicit bias in police decision-making has not been validated, and it may not be as expansive as researchers and others might suggest. Still, impartial policing should be a key focal point for all police organizations, and they should be diligent in working to eliminate possible bias within policing practices. Appropriate recruitment, selection, and retention of highly trained employees can be a key to preventing problems related to implicit bias, particularly as it relates to impartial policing. Additionally, departments should focus on high-discretion officer activities that could be susceptible to possible bias and implement strategies to monitor these activities and make corrections, as warranted.

Ordinance Review

Another specific scope item for this project involved a review of the Village's ordinances relevant to public safety, and a review the ordinances and citations issued, to determine any possible disparate impact.

Data

BerryDunn received a three-year dataset that included 727 ordinance violations issued during that period. This amounts to roughly one violation issued every two days. There were 56 different ordinance violation categories listed; however, only 13 of those categories had 10 or more violations over the three-year period. Within the dataset, there were four categories in which there were 30 or more violations over the three years:

- Damage to property (under three different ordinances)
- Disorderly conduct
- Possession/sale of cannabis
- Seizure/impoundment of a motor vehicle

These four categories combined for 483 violations. When additional cannabis and paraphernalia charges were added (those with less than 30 violations each), the total went up to 520; see Table 5.3. Of the 520 violations, 57 (10.96%) were issued to juveniles. BerryDunn observed

some disparities in race across the charged violations, particularly for cannabis (73.91% Black, 8.7% Hispanic, 15.94% White), and seizure/impoundment (66.41% Black, 21.09% Hispanic, 10.94% White). Disorderly conduct was not quite as unbalanced (65.56% Black, 4.44% Hispanic, 27.78% White), and damage to property was more balanced (42.49% Black, 11.59% Hispanic, 40.34% White).

Table 5.3: Ordinance Enforcement Data

		GENDER			RACE						JUVENILE
All Violations	**Total**	**Male**	**Female**	**Unknown**	**A**	**B**	**H**	**I**	**U**	**W**	**All Races**
Three Years (56 violation types)	727	542	181	4	14	407	79	1	23	203	121
TOTAL PERCENTAGES		**74.55%**	**24.90%**	**0.55%**	**1.93%**	**55.98%**	**10.87%**	**0.14%**	**3.16%**	**27.92%**	**16.64%**
Selected Violations											
Damage to Village Property	56	42	14	0	0	19	9	0	4	24	5
Damage to Village Property	47	31	16	0	0	12	9	0	1	25	5
Destroy/Damage Property (Public/Private)*	130	94	36	0	0	68	9	1	7	45	17
DAMAGE TO PROPERTY PERCENTAGES	**233**	**71.67%**	**28.33%**	**0.00%**	**0.00%**	**42.49%**	**11.59%**	**0.43%**	**5.15%**	**40.34%**	**11.59%**
Disorderly Conduct*	90	78	12		1	59	4	0	1	25	17
DISORDERLY CONDUCT PERCENTAGES	**90**	**86.67%**	**13.33%**	**0.00%**	**1.11%**	**65.56%**	**4.44%**	**0.00%**	**1.11%**	**27.78%**	**18.89%**
Possess/Sell Cannabis or Paraphernalia - Minor	20	13	7	0	0	12	3	0	0	5	11
Possess/Sell Cannabis - Intent to Deliver*	32	27	4	1	0	27	3	0	1	1	1
Possess Drug Paraphernalia	11	8	3	0	0	8	0	0	0	3	0
Possession of Cannabis	5	5	0	0	0	3	0	0	0	2	1
Possession of Cannabis by Minor	1	1	0	0	0	1	0	0	0	0	0
CANNABIS/PARAPHERNALIA PERCENTAGES	**69**	**78.26%**	**20.29%**	**1.45%**	**0.00%**	**73.91%**	**8.70%**	**0.00%**	**1.45%**	**15.94%**	**18.84%**
Seizure and Impoundment*	128	97	30	1	0	85	27	0	2	14	0
SEIZURE AND IMPOUNDMENT PERCENTAGES	**128**	**75.78%**	**23.44%**	**0.78%**	**0.00%**	**66.41%**	**21.09%**	**0.00%**	**1.56%**	**10.94%**	**0.00%**
OVERALL TOTALS [top violation categories]	**520**	**396**	**122**	**2**	**1**	**294**	**64**	**1**	**16**	**144**	**57**
Percentages		**76.15%**	**23.46%**	**0.38%**	**0.19%**	**56.54%**	**12.31%**	**0.19%**	**3.08%**	**27.69%**	**10.96%**

Source: Agency Provided Data

One common issue raised by community members involved concerns of police interactions with the juvenile population in Oak Park. In fact, the Freedom to Thrive Report indicates that a common report heard "over and over again from young people was the over-policing of young Black and brown people in Oak Park" (p. 1).[117] In BerryDunn's review of the data provided, only 2.6% of traffic stops involved juveniles,[118] and the total number of documented field contacts involving juveniles was 72.[119] The ordinance data in Table 5.3 also reflects a relatively small number of juvenile infractions (57 of the top violations, and 127 overall over three years). Although it is possible that some encounters with juveniles by the OPPD may not have been documented, the data BerryDunn reviewed includes all recorded enforcement efforts involving juveniles. The data BerryDunn reviewed does not demonstrate a propensity for targeting juveniles within Oak Park, irrespective of race.

Ordinance Language

BerryDunn reviewed several commonly enforced ordinances. A brief summary of each ordinance reviewed is provided below.

14-4-1: Damage to Village Property

For ordinances 14-4-1: Damage to Village Property, and 35-27: Damage to Village Property, BerryDunn was told that the controlling language is found in ordinance 17-1-7: Destroying Property, and that no charges should be filed under these ordinances.

17-1-7: Destroying Property

It shall be unlawful for any person to destroy or injure any public property or private property not his or her own. (Ord. 2008-0-037, 9-2-08)

This entire ordinance consists of the one sentence above. There is no language within the ordinance that would contribute to inequitable enforcement.

15-10-20: Vehicle Seizure and Impoundment

This ordinance describes when the police can seize and impound a motor vehicle. There are numerous provisions, which seem to explicitly copy state law. BerryDunn observed that this ordinance allows for vehicle seizure/impoundment for some very low-level offenses (cannabis violations in particular), and that those minor violations could negatively impact low-income drivers, who can ill-afford the tow bill and fines associated with enforcement of this ordinance.

Although this ordinance mirrors state law, inclusion as an ordinance could be seen as an opportunity to use the ordinance to raise revenue. Additionally, the ordinance (and the statute) has the potential to disparately affect impoverished persons. During interviews BerryDunn learned that the OPPD stopped using this ordinance in 2020, for some of the same reasons

[117] Reform/Transform: An Analysis of Policing Policy and Budgets in Oak Park, Illinois, April, 2020
[118] SDI Figure 5.4
[119] SDI Figure 5.9

listed above. BerryDunn applauds the OPPD for making this decision, but recommends the Village rescind this ordinance in its entirety. If there is a need to seize and/or impound a vehicle, the OPPD can still act under the state law that allows for this.

17-1-8: Disorderly Conduct

This ordinance is similar to typical disorderly conduct ordinances seen across the country. One section BerryDunn reviewed may be worth further examination. Section G references loitering on private property, or within three blocks of a school, and engaging in additional behaviors such as littering, using foul language, giving away alcohol or drugs (including cannabis), encouraging students to be truants, or refusing to leave the three-block area in circumstances where three or more persons are committing acts likely to cause substantial harm, annoyance, or alarm.

The nature of the language in Section G is highly susceptible to interpretation. This has the potential to create unequal enforcement efforts, which could result in inequitable and/or disparate impact on certain groups. BerryDunn recommends the OPPD review this ordinance with the Village prosecutor to determine whether this provision should be revised or eliminated in part or in whole.

Another aspect of this ordinance includes Section A, which includes the following: “Does any act in such unreasonable manner as to alarm or disturb another and to provoke a breach of the peace”.

BerryDunn takes no exception to this provision. However, in staff interviews, BerryDunn learned that the OPPD does not have a retail theft ordinance. Because there is no such ordinance, officers commonly issue an ordinance citation under this provision, reasoning that the theft has caused alarm or provoked a breach of the peace.

Although it is arguable that this reasoning is met by the language of the ordinance, issuing what is tantamount to a theft citation under a disorderly conduct violation is inconsistent with the spirit of this ordinance. Additionally, routing violations under this provision could be viewed as a revenue opportunity for the Village. BerryDunn recommends that the Village either adopt a retail theft ordinance, or discontinue local charges for theft, and rely entirely on state statute.

17-1-35: Possession, Manufacture, or Delivery of Cannabis

The ordinance incorporates the language of state law by reference but differs slightly. Sections B and C refer to the possession or manufacture of cannabis in amounts of 30 grams (approximately 1 ounce) or less, and Section D notes that penalties for violation are $750 for a first offense and $1,500 for a second or subsequent offense. Statute (720 ILCS 550/Cannabis Control Act) outlines that possession of under 10 grams of cannabis is a civil violation with a fine between $100 – $200. State statute also explains that possession/manufacture of more than 10 grams but not more than 30 grams of cannabis is a Class B misdemeanor; there is no specific fine listed.

This ordinance does not distinguish between cannabis offenses under 10 grams, or those between 10 and 30 grams. The fine listed in the ordinance, especially for low-level offenses, is

more than three times the fine listed in statute. Although the fine for Class B misdemeanors is not listed in statute, the Oak Park fine levels for cannabis violations are relatively high, when compared to other communities or states. Additionally, the fine levels may disparately affect low-income individuals, and the high fines could be viewed as a revenue opportunity for the Village. Lastly, this language and its enforcement may be inconsistent with community values. The language also does not distinguish a 'user amount', which, in theory, could result in those possessing very small amounts of cannabis incurring a relatively high penalty. Moreover, as statues around the country are legalizing user amounts of cannabis, the Village may wish to revisit this ordinance and the stated penalties.

Interviews

To gain additional knowledge about the process of enforcing ordinance violations within the Village, BerryDunn conduced several interviews with OPPD officers. During these interviews, BerryDunn made several important observations.

For any offenses involving a victim, officers consistently reported that the decision on whether to charge was left up to the victim. Officers typically explain the options to the victim, including the possibility of issuing a Village ordinance summons (when appropriate), or bringing a state charge. Although they are permitted under state law, BerryDunn learned that the OPPD does not issue a summons for state violations, but instead, individuals are physically arrested and booked for those crimes. This practice occurs regardless of the level of the violation. For example, theft or damage related to a one-dollar item could result in an arrest if the victim prefers it.

The use of a summons in lieu of an arrest is a common practice within the policing industry, and one the OPPD should adopt. The OPPD should develop protocols for this to help ensure equal enforcement, and deviations from any stated policy should require documented supervisor approval.

Another observation BerryDunn made refers to ordinance 17-1-7: Destruction of Property. This ordinance creates a penalty for anyone to cause damage any public or private property not his or her own; this ordinance does not include an intent provision. This means that anyone damaging property—even unintentionally or accidentally—can be charged under this provision. BerryDunn has not observed other ordinances that are similarly worded, and notes that the absence of intention as a provision of this ordinance creates the potential for unreasonable financial culpability. Like other ordinances BerryDunn reviewed, this ordinance could disaffect low-income individuals, and the use of this ordinance could be viewed as a revenue source for the Village.

BerryDunn learned that individuals involved in a motor vehicle crash who damage Village property—even unintentionally—are issued a summons under this ordinance. These violations are also issued, irrespective of whether the driver has motor vehicle insurance. This practice is considered non-discretionary, as officers reported they are required to issue a summons to everyone causing such damage. Officers also reported that in many cases, a driver may be issued a traffic ticket for a state violation and a summons for a Village ordinance infraction. This

practice appears to be a collection mechanism for the Village, and again, has the appearance of being a revenue source. Officers reported they never need to appear in court for these matters and that issuing a summons under this section is all about the Village collecting fines and/or reimbursement for the damage. Again, like other ordinances, this ordinance could disaffect low-income individuals, and the use of this ordinance could be viewed as a revenue source for the Village.

BerryDunn recommends the Village add a provision to this ordinance that incorporates intent into the violation. For example, “Whoever intentionally causes damage to physical property of another without the latter's consent is guilty of…” If the Village is concerned about reimbursement for damage to public property, the Village should pursue reimbursement from the driver’s insurance company, or through other civil means.

As mentioned previously, officers explained that the disorderly conduct ordinance is commonly used as a replacement for bringing a state charge (and custodial arrest) for theft. Again, the use of this ordinance is inconsistent with the spirit of the law, and the Village should discontinue using the ordinance for this purpose. If the Village desires to provide an alternative opportunity for minor charges, the Village should create a theft or retail theft ordinance that can be used in lieu of bringing a state charge.

To the OPPD’s credit, officers consistently reported that the decision whether to charge for many ordinance violations rests with the victim. Officers reported they consistently explain any possible charging options to victims and that they abide by the victim’s wishes. This practice helps ensure that victim-related ordinance charges are not susceptible to officer discretion, which reduces the likelihood of bias in these processes. Similarly, because officers are required to issue a summons for any destruction of Village property, this reduces the potential for bias.

Ordinance Review Summary

One of the expectations for this project was for BerryDunn to identify any ordinances that disproportionately impact minorities (adults or youth). BerryDunn noted that, as indicated above, several Village ordinances have the potential to disaffect low-income individuals, and/or to unduly penalize persons for minor infractions. As BerryDunn has noted above, there are several opportunities for the Village to make amendments to various ordinances (including the elimination of the vehicle seizure ordinance).

When considered within the context of the ordinances examined, including their application, the ordinance data BerryDunn reviewed, as reflected in Table 5.3, does not suggest biased application by the OPPD. Despite this finding, the nature, structure, and application of these ordinances is such that some individuals—particularly those experiencing financial struggles—may be particularly disaffected by an ordinance charge.

Many motorists are issued a citation for damage to property when they are involved in a motor vehicle crash; these citations are mandated by OPPD policy. Although Village ordinance is enforced indiscriminately, it has the potential to disparately impact drivers who are financially strained. Generally, damage to property is a crime of intent. When no intent is involved, which is

the case in nearly all motor vehicle crashes, a local summons should not be issued. The Village should modify its ordinances to reflect that all damage to property violations require intent.

If the Village is concerned about financial recovery for damaged property, this should be pursued through the insurance carrier for the offending driver. If the driver does not have insurance, an appropriate remedy would be the issuance of a state summons for that violation, and a request through the prosecutor to recover damages as a part of the traffic court process.

Various elements of the vehicle seizure and impoundment ordinance have potential to create disparate impact and the opportunity for biased enforcement. Independently recognizing this potential, the OPPD discontinued use of this ordinance in 2020. To date, however, the ordinance is still in effect. Since this ordinance is based on state statute, the OPPD could take appropriate action under the statute, rather than the ordinance, if appropriate circumstances existed. The Village should rescind this ordinance in its entirety.

The Village does not have a retail theft ordinance. As a result, the OPPD has only two options when a minor retail theft occurs: make a custodial arrest (and take the person to jail) or issue a citation for disorderly conduct (reasoning that the minor theft is an offensive action to the property owner, thereby meeting the language of the ordinance). Although perhaps technically legal, it is not the intent of the disorderly conduct ordinance to cover the crime of theft. The Village should create a separate retail theft ordinance and consider adding provisions that require its use instead of arrest for minor violations (e.g., theft under $100 or $250).

In addition, for minor thefts (e.g., candy bar, coffee), taking someone to jail represents a substantial action for a minimal violation. Although Illinois statutes allow for it, the OPPD and prosecutor's office have not established a process for issuance of a citation in lieu of a physical arrest. In addition to implementing the retail theft ordinance, OPPD should have the flexibility to issue a citation for minor thefts above the threshold established in the new ordinance (and for all other minor criminal incidents).

VIII. Training

During interviews, BerryDunn learned that OPPD officers receive a broad range of training related to cultural sensitivity and understanding, impartial policing, implicit bias, and procedural justice through the academy. The department continues this training – in varying degrees – as part of its in-service training. Staff BerryDunn spoke with indicated that impartial policing and DEI are important areas of focus within the department. In fact, a few years ago, the department even brought in a professional group to provide DEI training.

Providing this training is important—and it is encouraging to BerryDunn to see that the OPPD has done so. However, during interviews, BerryDunn heard varied perspectives about the state of DEI within the department. Although many provided favorable remarks, some staff indicated a desire and a need to continue to focus on this area. Some staff indicated there is a need to continue to broaden perspectives about DEI, both internally and externally. Because this is a critical element of impartial policing, BerryDunn encourages the OPPD to continue to provide impartial policing and DEI-related training.

Summary

The OPPD has a well-established COP philosophy for the organization, and BerryDunn observed numerous best-practice approaches by the OPPD regarding COP. However, the OPPD would benefit from expanding its COP efforts beyond the specialty units, and to encourage all department members to actively engage in meaningful relationship-building and problem-solving with the community.

Although the OPPD has several positive external partnerships, not all of these are formalized; many do not have clearly identified goals and objectives, and these partnerships are not regularly reviewed to determine their ongoing benefit. Accordingly, the OPPD should consider reviewing the purpose of these partnerships and their alignment with operational goals and community needs, and renew, update, or discontinue those partnerships, as appropriate. The OPPD should conduct this process for each partnership on a determined timeline.

As noted, the OPPD has built a strong COP philosophy within the department. However, the department and the Village would benefit from development and expansion of a collaborative model to further community involvement in police decision-making, to build upon and sustain the trust relationship the OPPD enjoys with the community, and to develop those relationships where they are lacking.

The Village has had the CPOC for decades, and during this time, its purpose has changed. In its current form, the CPOC is minimally effective. The OPPD should make changes to the CPOC ordinance/charter to improve its value to the community. Changes should be made to improve the CPOC's ability to monitor investigations and influence outcomes, and to make policy and procedural recommendations to improve public safety services, staff accountability, and transparency for the community.

Given feedback from department staff, there is an opportunity for the OPPD to expand its DEI efforts. To do this, the OPPD should establish a DEI committee and charge that group with the responsibility to monitor DEI elements that impact operations and personnel, including hiring and promotional processes. The DEI committee should also be responsible for monitoring external initiatives of the OPPD that have a DEI focus.

Based on a review of IPD data collection practices, the OPPD needs to make operational adjustments so that these data are consistently collected. To improve this condition, the OPPD should clarify its impartial-policing data collection policies, provide training to officers on applying these policies, and monitor compliance.

Suspicion incidents within Oak Park account for a large portion of overall volume. This is true whether these incidents are the result of a prompt from the community or a self-initiated action by an officer. Due to the ambiguity with suspicion incidents, there is potential for biased policing practices. To remedy this, the OPPD should change its approach to responding to suspicious incidents, and thoroughly document any suspicion-related contacts, whether community- or officer-initiated.

Consent searches are another type of incident that has potential for biased policing. Proper consent searches should include a signed waiver and suitable documentation of this voluntary consent. However, this is not the current practice with the OPPD. The department should modify its policy to require a signed waiver, and this action should be recorded by dash camera, or body worn camera (BWC), if available.

Pretext stops represent another practice that is susceptible to biased policing. To help ensure that traffic or other non-consensual contacts do not involve improper practices, the OPPD should create a policy that restricts the use of pretext stops. The policy should state that stops, for whatever reason, should focus on the infraction, and clarify that expanding the scope of an initial stop is not allowed, unless there are specific articulable facts developed within the scope of the initial contact that prompt additional inquiry. The policy should also clarify that if an expansion of a stop occurs, these facts must be documented in RMS and the impartial policing database (IPD).

Various community members have called for greater transparency by the OPPD in reference to a variety of data points. To improve community access, the OPPD should develop a data sharing philosophy that proactively shares data with the Village to help inform the public, improve transparency, and build trust. The OPPD should also create educational opportunities for the Village, to improve understanding of police operations and procedures and to create public awareness.

The OPPD has recently been under scrutiny with respect to its policing practices, particularly in reference to impartial/biased policing. Reducing/eliminating possible biased policing practices requires appropriate policies and monitoring of relevant data and practices. The OPPD should regularly monitor and evaluate its IPD to identify patterns that reflect possible bias. The OPPD should use the data to assist with development of strategies to correct possible biased policing patterns and should monitor the data on an ongoing basis to evaluate the success of operational adjustments implemented to mitigate them.

BerryDunn reviewed various Village ordinances and the associated enforcement data. The data does not demonstrate bias; however, there are various provisions within the ordinances reviewed that could allow an opportunity for bias, and for disparate impact. As BerryDunn has noted in this chapter, the Village and OPPD should make adjustments to its ordinances. The Village should modify the damage to Village property ordinances, rescind the vehicle seizure and impoundment ordinance, and develop a new ordinance for retail theft. The Village should also work with the prosecutor’s office to explore and implement a practice of citation in lieu of arrest.

Recommendations

This section provides the twelve formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 5.4: Chapter 5 Recommendations

Community Engagement		
No.	**COP**	**Overall Priority**
	Chapter 5, Section I: Community Policing	
5-1	**Finding:** The OPPD has a strong COP philosophy that has been successful in many ways. However, the OPPD does not provide ongoing COP training, lacks a clear explanation of department expectations for COP efforts for officers, and does not track those efforts substantially. **Recommendation:** The OPPD should build processes, opportunities, and expectations for all members of the OPPD to actively support community policing by expecting all team members to engage in active, deliberate, and meaningful relationship-building and problem-solving with the community. Expectations for officers should include strategies for building community relationships, as well as specific goals, policies, and objectives. These steps should create an agency-wide philosophy of proactive community interaction and establish formal responsibility to each employee of the agency, including the importance of each member's contributions to the overall success of the department. The OPPD should take several steps to encourage more consistent community policing efforts by staff. BerryDunn has provided several possible actions the OPPD may wish to consider: 1. Each new officer should be required to engage in a community-based POP project as part of their field training. This will not only benefit the community, based on the outcome of their work, it will also solidify an understanding of the processes involved in these projects. This will benefit both the new officer and the FTO who must oversee the project. 2. Each new officer should be required to shadow an RBO/NRO officer for a week during field training. If possible, this week should be scheduled to coincide with the assigned POP project, so the trainee can leverage the knowledge and experience of the RBO/NRO for that work. 3. The OPPD should provide periodic in-service training on community policing to staff, to include examples of successful projects and strategies officers have used, either internal or external to the OPPD. 4. Internal COP training should emphasize COP as a department-wide philosophy, not the responsibility of RBOs and NROs. Additionally, when patrol officers forward POP referrals to RBOs and NROs, the referring officer should be involved in the POP effort and solution, whenever possible. 5. The OPPD should continue to embrace the concept of geographical policing and strive to establish continuity of personnel deployments within designated zones or geographic areas. This type of focused deployment should aid officers in understanding that section of the community and its	

Community Engagement		
	unique needs, and assist officers in building relationships and trust within the community, particularly within their assigned work area. 6. The OPPD should establish expectations for COP activity and a mechanism to capture this data. This information should be used as part of the performance evaluation, and as a mechanism to monitor COP activities by officers. 7. Demonstration of an understanding of COP and proven application of COP principles as a knowledge, skill, and ability should be an assessment area for promotion.	

Community Engagement		
No.	**Professional Partnerships**	**Overall Priority**
Chapter 5, Section I: Community Policing		
5-2	**Finding:** The OPPD has formed partnerships with advocate organizations and other law enforcement and non-law enforcement agencies. Many of these partnerships have been effective and are representative of innovation and best practices within the industry. Although these partnerships have been beneficial, the OPPD does not maintain a repository of active partnership agreements and does not review or monitor partnerships to assess whether they continue to meet operational goals and community needs.	
	Recommendation: The OPPD should engage a process to identify all current external partnerships, formal or informal. The OPPD should review the purpose of the partnerships and their alignment with operational goals and community needs, and renew, update, or discontinue those partnerships, as appropriate. The OPPD should conduct this process for each partnership on a determined timeline.	

Community Engagement		
No.	**Community Co-Production Policing**	**Overall Priority**
Chapter 5, Section I: Community Policing		
5-3	**Finding:** In general, the OPPD has enjoyed a positive reputation within the community, based on its long-standing COP efforts and its overall service to the Village. However, national calls for reforming the policing industry, as well as local concerns recently raised, demand an appropriate response. For the OPPD, there is a need to build community trust, particularly with traditionally marginalized populations.	

Community Engagement		
	Recommendation: The OPPD should expand and formalize its COP efforts, and pursue a collaborative model to further community involvement in police decision-making, to build upon and sustain the trust relationship the OPPD enjoys with the community, and to develop those relationships where they are lacking. To accomplish this, the OPPD should engage in efforts that seek greater community involvement and collaboration in ownership of policing strategies for the Village. Both the report from the President's Task Force on 21st Century Policing and the President's Commission on Law Enforcement and the Administration of Justice call for co-production policing. As a starting point, BerryDunn recommends that the Village create a committee that represents the unique diversity of the community and possesses real and substantive authority to review and guide decisions about community safety, law enforcement, justice, and the roles, strategies, and approaches of policing within that broader environment. The committee should consider possible collaborative pathways and produce a report that outlines areas for further exploration and implementation. Following that report, BerryDunn recommends the Village, CPOC, and the OPPD, consider revisions to the CPOC charter and mission, to better serve the public safety needs of the community.	

Community Engagement		
No.	**CPOC**	**Overall Priority**
Chapter 5, Section III: Citizen Police Oversight Committee		
5-4	**Finding:** In its current configuration, the CPOC is limited in its ability to provide meaningful oversight of OPPD complaints, and to promote operational changes or procedural adjustments that could improve public safety services and staff accountability. Significant adjustments to the CPOC's role and charter are needed to improve its value and effectiveness.	
	Recommendation: The OPPD should make changes to the CPOC ordinance/charter to improve its value to the community. Changes should be made to improve the CPOC's ability to monitor investigations and influence outcomes, and to make policy and procedural recommendations to improve public safety services, staff accountability, and transparency for the community. In addition, to build trust and transparency with the community, BerryDunn recommends the Village and OPPD draft a new vision for the CPOC that is founded in collaboration and one that is significantly more interactive. This could involve considering renaming this body, and possibly, developing a revised mission statement. BerryDunn recommends consideration of a collaborative model, to improve interactions and solutions-based approaches between the CPOC and the OPPD, as well as with the community as a whole.	

Community Engagement		
No.	**DEI**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-5	**Finding:** The Village and OPPD have been promoting the progressive and inclusive nature of their community and police department for decades. Although staff acknowledge this history, there is a sense that the OPPD could do more to promote, understand, and address DEI perspectives, both internally and externally.	
	Recommendation: The OPPD should establish a DEI committee and charge that group with the responsibility to monitor DEI elements that impact operations and personnel, including hiring and promotional processes. The DEI committee should also be responsible for monitoring external initiatives of the OPPD that have a DEI focus. BerryDunn offers the following points of consideration for DEI efforts by the OPPD. ***Transparency*** 1. Address data limitations: Collect and link identifiers across OPPD data sources, ensuring relevant data from arrest reports, incident reports, and use of force reports are manageable and support department and third-party analysis scrutiny when requested. 2. Provide annual public reports on stop, use of force, and IA/complaint data, noting any disparities and agency efforts to address training, policy, and accountability, as appropriate (in addition to crime data analysis public reports). 3. Develop an integrated approach by engaging police administrators, officers, and community stakeholders to better understand and address the factors that may have contributed to reported disparities, and to collectively identify policy, training, and other measures to address/reduce disparity (in addition to quantitative analysis). ***Training*** 1. Build additional collaborations with outside mental health advocacy and treatment organizations beyond CIT training (e.g., trauma informed, IDD – intellectual or developmental disabilities). 2. Look into peer intervention training programs like EPIC (Ethical Policing is Courageous) and ABLE (Active Bystandership for Law Enforcement). 3. Incorporate anti-racism and cultural diversity workshops into the training curriculum (not the typical 1–2-hour presentation, but courses that involve real adult learning opportunities). 4. Thoroughly review any DEI-related courses to determine which courses could be effectively co-taught by an outside civilian or academic content	

Community Engagement		
	expert with an OPPD instructor to increase agency cultural competency (DEI issues are constantly evolving). 5. Consider teaching evidence-based de-escalation training such as the Police Executive Research Forum's (PERF) Integrated Communications, Assessment and Tactics (ICAT). ***Community Relationships*** 1. Continue to proactively reach out to community leaders, activists, and critics who are willing to work productively with OPPD to present genuine community perspectives about public safety in the Village. 2. Develop DEI-related public service announcements (PSAs) to educate the community on the OPPD's efforts to address and enhance DEI training and initiatives. 3. Consider more guardian-centric adult learning, that is community oriented, where possible. ***Accountability*** 1. Assess and identify gaps in the CPOC process and provide more transparency and robust oversight in the complaint process (reduce public perception of rubber stamping). 2. Consider obtaining Body Worn Cameras (BWC) ***Recruiting*** 1. Follow up with any police cadet who leaves the academy or FTO training for any reason. 2. Develop a mentorship program for all cadet applicants, especially recruits of color, which is designed to support cadets and help them succeed in academy training.	

Community Engagement		
No.	**Impartial Policing Data Collection**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-6	**Finding:** The OPPD is not consistently collecting impartial-policing data on traffic stops and other non-consensual police contacts. Staff lacks clarity on this policy and how it should be applied. In addition, the OPPD does not collect or record subject data in its records management system (RMS) on all police-related contacts (including calls for service). **Recommendation:** The OPPD should clarify its impartial-policing data collection policies, provide training to officers on applying these policies, and monitor compliance. In addition, the OPPD should develop and implement a policy for collecting subject data on all police-related contacts for entry into RMS.	

Community Engagement		
No.	**Suspicion Incidents**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-7	**Finding:** Responding to community CFS of suspicious persons or events is a common activity for the OPPD. Many officer-initiated contacts with pedestrians, vehicles, or bicyclists are labeled suspicious. The term suspicious is non-specific, which can create an opportunity for bias-based contacts.	
	Recommendation: The OPPD should change its approach to responding to suspicious incidents, and thoroughly document any suspicion-related contacts, whether community- or officer-initiated. The OPPD should categorize all suspicion incidents as having context, or no context. Incidents with context are those in which specific behaviors, conduct, or circumstances are reported or observed that would lead a reasonable person or officer to conclude that the behavior is abnormal, unusual, dangerous, or possibly criminal, based on the totality of the circumstances and specific articulable facts. Suspicion CFS (or officer-observed incidents) without context would include any situation in which there are no reported or observed specific behaviors, conduct, or circumstances. The OPPD should develop protocols around suspicion incidents with or without context, and train officers, non-sworn OPPD personnel, and dispatchers on these protocols. At a minimum, these protocols should specify: • OPPD officers must have context in order to make a stop based on suspicion. • If context does not exist, based on initial observations or caller reported information, OPPD officers shall not make contact. • If suspicious incidents are reported without context, OPPD officers should respond to the area, but should not make contact unless they are able to independently establish context. • OPPD officers must report on any suspicious contact or non-contact through the RMS. • If an officer makes contact on a suspicious incident, whether observed or reported, the officer must document the contact in the OPPD impartial policing database (IPD).	

Community Engagement		
No.	**Consent Searches**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-8	**Finding:** The OPPD regularly conducts consensual searches of people and/or their property, without a formal waiver and/or documentation of the basis for the search.	
	Recommendation: The OPPD should establish a policy that requires a signed waiver for any consent searches of a person or their property. The policy should also specify that whenever possible, the consent should also be recorded by dash camera, or body worn camera (BWC), if available. The policy should specify that OPPD may not request a consent search without first establishing specific articulable facts to support a search request. The OPPD should develop a form or waiver card that outlines the rights of a person to refuse a consent search, and which requires a date and signature. No consent searches should be conducted by OPPD personnel without a signed consent search waiver. Any request for a consent search must be documented in RMS and the IPD, regardless of whether consent is granted and a search occurs.	

Community Engagement		
No.	**Pretext Stops**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-9	**Finding:** The OPPD regularly engages in pretext stops for the purpose of identifying possible illegal activity. Pretext stops can create an opportunity for bias-based contacts.	
	Recommendation: The OPPD should create a policy that restricts the use of pretext stops. The policy should state that stops, for whatever reason, should focus on the infraction, and clarify that expanding the scope of an initial stop is not allowed, unless there are specific articulable facts developed within the scope of the initial contact that prompt additional inquiry. The policy should also clarify that if an expansion of a stop occurs, these facts must be documented in RMS and the impartial policing database (IPD). This policy and practice should apply to pedestrian or vehicle stops, as well as bicycle (or other conveyance) stops. If an officer stops a bicyclist for a moving or equipment violation, the stop should focus on that purpose. Checking the serial number of a bicycle is an expansion of the stop and should not occur unless there are specific articulable facts that prompt additional inquiry. For example, knowledge of a missing bicycle matching the description of the bicycle stopped	

Community Engagement		
	would be considered sufficient cause for checking the serial number. If an expansion of a bicycle stop occurs, these facts must be documented in RMS and the IPD.	

Community Engagement		
No.	**Transparency and Community Education**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-10	**Finding:** The OPPD does not have a mechanism for proactive data sharing with the community. The OPPD also has not developed a structured approach to educate the community about police operations or procedures.	
	Recommendation: The OPPD should develop a data sharing philosophy that proactively shares data with the Village, to help inform the public, improve transparency, and build trust. The OPPD should also create educational opportunities for the Village, to improve understanding of police operations and procedures and to create public awareness. The OPPD should consider the following areas (at a minimum) for data sharing: • Crime mapping, including an active dashboard and up-to-date data push • Internal affairs complaints by category, internal and external, along with disposition data • Impartial policing data quarterly (at a minimum) • Key operational policy decisions or adjustments In addition, to help educate community members about police operations, the OPPD should consider developing a series of PSAs that explain what the police do, and why. Topics could include (but are not limited to): • Traffic stops • High-risk vehicle stops • Crisis intervention • Use of force and de-escalation	

Community Engagement		
No.	**Impartial Policing Data Monitoring**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-11	**Finding:** The OPPD has not routinely monitored or evaluated the IPD collected by officers regarding its non-consensual encounters with individuals. Monitoring and evaluating this data is a critical step in identifying possible biased policing	

Community Engagement		
	patterns, and in developing strategies to correct them.	
	Recommendation: The OPPD should regularly monitor and evaluate its IPD to identify patterns that reflect possible bias. The OPPD should use the data to assist with development of strategies to correct possible biased policing patterns, and monitor the data on an ongoing basis to evaluate the success of operational adjustments implemented to mitigate them.	

Community Engagement		
No.	**Ordinance Revisions**	**Overall Priority**
Chapter 5, Section VII: Impartial Policing and Race Equity		
5-12	**Finding:** Elements of Village ordinances have the potential to create disparate impact for marginalized populations. OPPD ordinance enforcement processes and procedures have a similar potential, as well as the potential for bias in enforcement.	
	Recommendation: The Village and OPPD should make adjustments to its ordinances. The Village should modify the damage to Village property ordinances, rescind the vehicle seizure and impoundment ordinance, and develop a new ordinance for retail theft. The Village should also work with the prosecutor's office to explore and implement a practice of citation in lieu of arrest.	

Chapter 6: Investigations Services

Investigations Services: includes an overview of the investigations bureau, examining staffing, case assignments, closure, routing, and supervision.

Second only perhaps to patrol, the investigative function of any police organization is vitally important to operational and organizational success. The primary function of the Investigations Section is to provide follow-up investigations on a wide range of crimes and to work collaboratively with external partners to provide a professional product that will further the goal of accountability for offenders. The Investigations Section of the OPPD has many duties and responsibilities, which include, but are not limited to: crimes against persons and property, control of crime scenes, crime scene processing, evidence collection, and forensic examination of scenes/collected evidence.

There are many considerations involved in determining investigative staffing. Due to the wide range of variables that affect the investigative function, it is BerryDunn's assessment that no process fully assesses these needs. Each agency is different, and the myriad variables make it impossible to conduct a straight agency-to-agency analysis. For this project, BerryDunn has used a variety of calculations and analyses to draw the conclusions presented here, and the narrative below outlines those findings. Generally, BerryDunn's assessments rely on workload and work outputs, which are described further in this chapter. This analysis process also relies on the collective experience of BerryDunn in assessing staffing levels within police agencies, and on national and other comparative data BerryDunn has gathered.

This information below provides BerryDunn's assessment of the investigations function within the OPPD.

I. Investigations Staffing

The OPPD operates within a general investigations structure,[120] and although some investigators have stronger backgrounds and skills in certain categories, those assigned to investigations are generalists, and each are available to be assigned to any case type. The Investigations Section includes two task force officers, three assigned to street crimes, and a civilian crime analyst. There are 12 investigators, which includes two sergeants, all of whom carry a caseload.[121]

II. Work Schedules

Case investigators for the OPPD are separated into two teams who work 10-hour shifts. Dayshift investigators work Monday through Thursday from 8 a.m. to 6 p.m., and afternoon investigators work Wednesday through Saturday from 2 p.m. to midnight. Investigators rotate

[120] SDI Figure 6.1
[121] SDI Table 6.1

through these shifts every four weeks. Many departments do not stagger shift hours for investigators—and this is particularly true for agencies similar in size to the OPPD. BerryDunn notes that this schedule helps support the operational needs of the department and represents a best practice in staffing for this unit.

The number of actual hours available for investigators is an important consideration in determining staffing needs and BerryDunn examined the number of hours investigators have available to conduct their work. Based on the data provided by the OPPD, investigators have 1,933 hours available annually for case investigations.[122] Based on several prior studies, the average number of available hours for investigators is 1,709. The OPPD number is high in comparison to the prior study averages. BerryDunn lacks the data to explain this variation, but notes reported vacation and holiday hours are comparatively low (and perhaps understated), and that the actual time OPPD investigators have available to them to conduct their work is likely closer to study averages. Regardless, BerryDunn uses this number (1,933) in various calculations in the following sections.

III. Policies and Procedures

The OPPD has an extensive policy manual containing various policies relevant to law enforcement operations. BerryDunn provides a general overview of the OPPD policy manual in Chapter 7, along with a series of recommendations. BerryDunn also asked the OPPD to provide specific policies relative to investigations case assignments, case durations, and case supervision.

The proper functioning of a criminal investigations division within a police agency is vital to its operations, and like uniformed patrol, the investigations function is susceptible to inefficiency and ineffectiveness when not properly staffed. Criminal investigations take considerable time, focus, and effort, and when investigators are overwhelmed with a prohibitively burdensome caseload, it reduces their effectiveness. Accordingly, once appropriate staffing levels in investigations are determined, the department should take appropriate steps to ensure continuous staffing of all positions.

During the review of the Investigations Section, including staff interviews, data analysis, and policy review, BerryDunn noted several areas in need of adjustment. Areas identified through this process include the following:

- Use solvability factors at the patrol level
- Assign initial case review to patrol supervisors
- Conduct follow-up calls on suspended cases using non-sworn staff

[122] SDI Table 6.2

- Have investigation supervisors route cases as appropriate
- Engage crime analyst to review all cases and report any connections

As with the Patrol Section, the department should take a position that all investigations assignments are *essential* and backfill any vacancies in investigations from personnel in less-essential roles within the organization whenever possible.

The OPPD provided BerryDunn with Policy 1.30 Detective Supervisor, Duties and Responsibilities. This policy outlines the expectation for supervisors, including their duty to assign and monitor case progress.

BerryDunn also reviewed Policy 5.13 Investigative Case Screening and Case Management. This policy outlines the use of weighted solvability factors, and although these are noted in policy, and BerryDunn learned that these are sometimes used, this is generally done informally and inconsistently. Policy 5.13 also includes information about expected case durations. Policy outlines that cases should be assigned and open for up to 30 days. Cases can be extended for 30 days by the detective supervisor, and an additional 10 days by the division commander. Upon inquiry, OPPD informed BerryDunn that although they are not outlined in policy, different case investigations are generally afforded different durations, as follows:

- Standard Case: 30 days
- Major Case: 45 days
- Financial Case: 90 days

Procedures

BerryDunn also asked the OPPD to provide data on cases assigned, worked, and their overall durations. The OPPD explained to BerryDunn that the department has not consistently used the RMS (or any other system) to assign, update, and close cases assigned in investigations. Due to these inconsistencies, the data that is in RMS is not reliable – whether for past investigations assignments, or even for current active cases (at the time of this study). BerryDunn is aware that the OPPD has implemented protocols to more appropriately track cases going forward.

BerryDunn also discussed case monitoring by investigative supervisors and how they track active cases. BerryDunn learned that although there are regular meetings between investigators and sergeants, including discussion of major cases, incremental reviews of all active cases by each investigator are not regularly conducted. Additionally, there are no other requirements (specific timelines) for supplemental reporting or investigative activity by investigators for active cases.

As BerryDunn has noted, proper staffing of an investigations unit is a critical element of efficiency and effectiveness. Supervisor monitoring, reviewing, and prompt investigation of cases by investigators is equally important. When this does not occur, or it is inconsistent, the overall effectiveness of the unit is compromised. The OPPD should continue to pursue active

supervision activities in investigations, to help improve timely completion and closure of cases, and to help improve overall capacity for detectives.

Another aspect of BerryDunn's review involved examining how cases are routed for assignment for investigations. Currently, all criminal case reports are routed for review by the investigations sergeants for determination of activation. This is not an efficient process—or use of supervisors' time—because the vast majority of these cases are not activated for investigation. Essentially, investigative sergeants spend significant time reviewing case reports that do not require their attention nor warrant additional investigation.

The OPPD should revise its process for reviewing criminal cases to delegate specific tasks to appropriate personnel and to save time for investigators. To accomplish this, the OPPD should have patrol officers fill out solvability factors (as outlined in Chapter 4), and patrol supervisors should either close the case—based on solvability—or forward it to investigations, if appropriate. To help ensure clear understanding of possible criminal connections, the crime analyst should review all criminal reports, and forward any relevant information to the right resources.

Communication

As is typical in most police departments, patrol staff do not currently receive any active or automated notification when a case they submitted for review or investigation is closed. This lack of active communication might inhibit productive two-way exchange of information and lead to a feeling of disconnect between patrol and investigations that inhibits collaboration in a mutually beneficial manner. A simple solution to this problem is for the OPPD to create an automated feedback loop to ensure the officer who originated a case handled by investigations is notified about its closure. This system will improve communication between patrol and investigations and help ensure that patrol staff are aware of which cases are being pursued or closed. Open communication of this nature can also lead to improved preliminary investigations, report writing, and ultimately, to higher case-closure rates.

IV. Workloads and Caseloads

The following section provides various narrative, data, and tables that describe the workload and caseloads of the Investigations Section of the OPPD. These data emanate from various sources and include CAD, RMS and other data supplied by the OPPD.

Based on discussions with OPPD staff, and BerryDunn's observations, the data presented in this section—which relies primarily on information in RMS—is not considered fully reliable. What this means is that although BerryDunn has provided an analysis of this data, due to noted inaccuracies in the available data, it is not possible to make accurate staffing recommendations from this data.

At the outset of this project, BerryDunn requested three years of case assignment data, and the OPPD produced a dataset of all criminal cases for that period. The dataset contained approximately 3,500 records reportedly assigned to investigations, which included assignments

for various crime types.[123] The three-year average of these records includes 662 Part 1 crimes (most serious) and 486 Part 2 crimes (all other crimes).

In Table 6.1, BerryDunn calculated the average number of hours each investigator has available for each case. This model engages the workload hours available as described previously (1,933), based on the 12 investigations personnel allocated who conduct case investigations.

Table 6.1: Investigations Capacity Per Detective

Case Assignments	*Cases Assigned	**Number of Detectives	Annual Cases per Detective	Monthly Average per Detective	Average Available Hours per Year	Average Hours Available per Month	Average Hours Available per Case
Part 1 Crimes	662						
Part 2 Crimes/All Others	486						
Totals	1,148	12	96	8	1933	161.10	20.21

Source: Calculations from Data Provided
*Current year data
**Reflects personnel assigned who carry a full caseload

Based on the data in Table 6.1, investigators average eight active cases per month, and have approximately 20 hours to investigate each case. Again, the data in Table 6.1 may be inaccurate, based on noted challenges in the RMS data.

Because there are no set national standards for case assignments or caseloads, the process of conducting a workload analysis for investigations units is complicated. However, the OPPD numbers reflected in Table 6.1, if accurate, would be reasonable and manageable. Based on BerryDunn's national work and a national survey of investigators, typical caseloads per investigator range from 10-15 per month, with most expecting case closures within 1-2 months. A general range for annual cases per investigators would be between 80 and 120, and the data in Table 6.1 falls within this range.

Based on experience, observations, and interviews with investigators and supervisory personnel, BerryDunn knows that other duties and responsibilities consume a substantial amount of daily activity for investigators. To quantify investigative and non-investigative work efforts, BerryDunn provided an internet-based survey to the investigators. The survey asked investigators to quantify the percentage of time they spend conducting various activities. Based on that data, OPPD investigators reported spending roughly 15% of their time on activities that are generally associated with non-investigative duties.[124] Additionally, BerryDunn observed that OPPD investigators self-reported spending 43.89% of their time conducting investigations. This

[123] SDI Table 6.3
[124] SDI Table 6.4

percentage—which represents a significant portion of their time—is more than double national data in the same category. If accurate, this number would be an indication of a high degree of work effort dedicated directly to investigations.

BerryDunn has also averaged self-reported data from several recent studies and data from a national survey of police investigators, conducted by the IACP, and has compared this data to the same self-reported survey data provided by the OPPD. When examining the OPPD data against the comparisons, BerryDunn notes that many of the totals are similar, whether compared to the prior study averages or the nation-wide survey averages. The most notable higher reported average for the OPPD relates to the percentage of time associated with investigation time, as reported above.

The value of the information from the self-reported survey has limitations, based on how investigators understood the question categories and how they reported their time within the categories. Still, from a productivity standpoint, there is value in looking at these numbers to consider where investigators are placing their efforts, and whether there are opportunities to add efficiency to those processes.

In the same survey in which investigators were asked to quantify and self-report their non-investigative time, BerryDunn also asked them to provide data related to their current and preferred caseloads; their responses are reflected in Table 6.2. As noted above, there are no national standards to determining appropriate case assignment levels. However, the data in Table 6.2, from nearly 1,000 investigators nationally, are a likely a representative sample of the industry.

Table 6.2: Self-Reported Current and Preferred Caseloads

Investigations Caseload	Oak Park PD Current	*Prior Studies Current Avg.	National Current Avg.	Oak Park PD Preferred	Prior Studies Preferred Preferred Avg.	National Preferred Avg.
Fraud/Financial Crimes	16	9	18	13	8	11
Homicide/Violent Crime	11	12	15	7	7	9
Other Crimes Against Persons	22	14	18	12	7	12
Property Crimes	32	15	18	10	8	11
General Investigations	16	9	14	12	5	9
Other Specialized Unit	18	14	13	10	9	9
Task Force	36	17	10	9	9	7
Vice/Narcotics	12	22	11	8	21	7

Source: Investigations Workload Survey
*Table includes data from prior studies.

Based on data from the OPPD, as shown in Table 6.2, investigators report carrying caseloads that are well over the 10-12 average BerryDunn has identified previously as a common norm within the industry. The preferred self-reported caseloads for the OPPD fall within the stated norm range.

BerryDunn also notes that during interviews, investigators reported commonly carrying between 10-15 cases on a regular basis. If that reported number is true – and it is consistent – it would provide additional evidence to suggest that the case assignment data from the RMS are inaccurate and may be underreported.

Case Closure Rates

As part of the same survey mentioned above, BerryDunn asked OPPD investigators to identify what they felt the expected case closure timeline was within their agency, based on four categories: Serious Person crimes, Other Person crimes, Property crimes, and Fraud/Financial crimes. BerryDunn also asked investigators to identify what they felt would be an optimal timeline for case closures in the same categories. Investigators reported a belief that the current expectation for case closures ranges from 30-90 days, with most reporting that cases should be cleared within 60 days. When asked about optimal closure rates, investigators reported an extended period, with most indicating a preference for 30-90 days, and even some indicating some cases should be more than 90 days.[125]

As noted previously, the OPPD does have a policy that outlines case-closure expectations. However, the policy is inconsistent with the reported practice in use; these are not closely monitored by supervisors. BerryDunn observes that the desired optimal closure timelines from OPPD investigators are longer than prior studies and national averages. Additionally, because new cases are assigned each month, investigator caseloads tend to compound as closure timelines are extended; this can impede efficiency. Again, active case monitoring and regular assessments by supervisors can help reduce case closure timelines and improve overall efficiency of the unit.

Investigations Staffing Summary

As previously noted, BerryDunn has concluded, and the OPPD has specifically stated, that the case assignment data available and provided by the OPPD is inaccurate. Again, BerryDunn is aware that the OPPD has been working on correcting the historic conditions that have created these inaccuracies. Because of these inaccuracies, however, BerryDunn cannot perform a reliable workload analysis for the Investigations Section of the OPPD.

Despite this limitation, BerryDunn has assessed the totality of the data available, including reported crimes, patrol CFS data, workloads, CFS types, and on-scene times, and concluded that the current allocation of investigators for the OPPD is justified for managing the serious

[125] SDI Table 6.5

crimes occurring within the Village. It is BerryDunn's assessment that with additional data and analysis, the OPPD could conduct a more informed analysis of the staffing needs for criminal investigations. However, without more accurate data, BerryDunn is unable to make specific staffing recommendations. Again, the OPPD should more carefully track case assignments and closures and monitor these data to determine whether it supports additional staff in the future.

Summary

The Investigations Section for the OPPD is led by a commander and three sergeants, with most investigators assigned to general investigations. Although the OPPD provided BerryDunn with an extensive dataset outlining its case assignments for the Investigations Section, and BerryDunn conducted numerous calculations from the data, as represented in this chapter, there were significant limitations in the dataset. These limitations include underreporting of case activations and a lack of use of the RMS to manage assigned cases. These conditions significantly impeded quantitative analysis of workloads for the Investigations Section.

The OPPD would benefit from adjusting its case review and case assignment process to add efficiency. This includes assigning preliminary case review and closure responsibilities to patrol sergeants, and requiring the use of solvability factors at the patrol level.

The RMS of the OPPD has the ability to track and monitor case assignments and progress for investigations. Interviews with investigators and supervisors indicate varied methods of case monitoring. The OPPD is not maximizing the use of its RMS to monitor case assignments, and supervisors are not formally and consistently monitoring cases of investigators within the unit. Fully utilizing this system should provide the OPPD with additional data to monitor and analyze investigation efforts and staffing needs.

Based on a review of the data available for workloads in the Investigations Section, BerryDunn cannot make an accurate assessment of staffing needs. Accordingly, BerryDunn is not recommending the addition – or reduction – of any personnel for the Investigations Section.

Recommendations

This section provides the two formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 6.3: Chapter 6 Recommendations

Investigations Services		
No.	**Case Assignment and Monitoring**	**Overall Priority**
Chapter 6 Section III: Policies and Procedures		
6-1	**Finding:** The RMS of the OPPD has the ability to track and monitor case	

Investigations Services		
	assignments and progress for investigations. Interviews with investigators and supervisors indicate varied methods of case monitoring. The OPPD is not maximizing the use of its RMS to monitor case assignments, and supervisors are not formally and consistently monitoring cases of investigators within the unit.	
	Recommendation: The OPPD should take steps to more appropriately use the RMS to track and monitor case assignments and progress by investigators. Supervisors should be required to conduct periodic case reviews for all open cases, and to document case reviews and expectations, consistent with department standards on case updates and expected closure dates.	

Investigations Services		
No.	**Criminal Case Review and Assignment**	**Overall Priority**
Chapter 6, Section III: Policies and Procedures		
6-2	**Finding:** The process in place for reviewing criminal cases for follow-up and assignment to an investigator is inefficient and in need of adjustment. The current practice of having investigators review each criminal incident is time consuming, and in many cases, unnecessary. Many reports lack sufficient basis for follow-up, and having investigators review these is an inefficient process.	
	Recommendation: The OPPD should revise its process for reviewing criminal cases to delegate specific tasks to appropriate personnel and to save time for investigators. Patrol sergeants, who are responsible for review of all incident reports, should be empowered to close criminal cases without the need for additional review. This decision should be based on the solvability factors (as completed by the originator of the incident report), and the supervisor's review of the substance of the case. Patrol sergeants should both close the case and forward it for secondary contact or leave the case open and forward it to investigations for review. Cases forwarded for secondary contact should be routed to a non-sworn staff member to re-contact the victim to determine if there is any new information, and to let them know that the department has reviewed their case. If additional information is identified during the re-contact call, the staff member can forward the case to investigations for follow-up. The crime analysis team should review all criminal cases, whether closed or forwarded for follow-up, to help ensure a consistent understanding of all criminal events, and to look for patterns of activity or persons. If these are identified, the analysis team should forward relevant information to the appropriate commander or unit, and/or include that information in their ILP report.	

Chapter 7: Operational Policies

Operational Policies: includes an overall review of all department policies with a focus on critical policies, risk management strategies, and the process of policy creation, review, training, and dissemination.

BerryDunn is aware that the OPPD is in the process of moving to a new policy platform (Lexipol). This process is incomplete and is not expected to be finalized during this project. Accordingly, BerryDunn and the OPPD agreed upon a strategy for policy review that referenced its current manual, including any associated recommendations. The OPPD will consider BerryDunn's recommendation in its process of implementing Lexipol for the department.

BerryDunn conducted a general and limited review of the Oak Park Police Department's (OPPD) Policy Manual (Policy) with particular focus on critical high-risk and emergent policies.

It is important to note that the Policy review BerryDunn conducted was general in nature, as are the recommendations. None of the information in this section should be considered legal advice, and BerryDunn recommends that the OPPD discuss any Policy adjustments with its legal advisors prior to adoption and/or implementation.

The Policy reviewed was provided to BerryDunn by OPPD in a single PDF document that was searchable by word or phrase and included both a table of contents and an index. The combined Policy document comprises 1473 pages (inclusive of table of contents and index). The Policy is publicly available online via the Village's official website on the OPPD's landing page, under a tab titled "General Orders", where the Policy is provided via two hyperlinks titled "Administration General Orders" and "Operations General Orders". That section of the department's website also includes a brief but informative Frequently Asked Questions section about the Policy.

Despite the public availability of the Policy, the disclaimer at the beginning of the Policy states, *"General Orders are confidential in nature and not open to the public".* OPPD should revise the disclaimer to ensure language is consistent with actuality. Additionally, the Department's website indicates that the Policy is currently under review and scheduled for complete update by the first quarter of 2021. This description needs to be updated and the Policy linked there needs to be reconciled to the current effective Policy for the department. BerryDunn did not compare and contrast the Policy linked on the website to the one provided for this review, and does not opine about whether there are any conflicts or contradictions. OPPD should, however, endeavor to ensure that any publicly available or disseminated versions of the Policy always reflect the most current and complete version of the Policy for which employees are responsible, and that there are procedures in place to conduct this type of review on a regular basis.

The disclaimer at the start of the Policy states that it is available to all employees digitally and includes a general statement that reads: *"Each member of the Department will become familiar with all General Orders. It will be the responsibility of each subordinate to review and become familiar with the content of each new directive distributed."* Policy Section 2.07 requires all members to have a copy of the Policy in their possession while on duty, but does not specify if it

must be a physical copy or if access to a digital copy satisfies this requirement. Also, the Policy does not include any description of how satisfaction of the requirement to obtain and review the Policy is documented and archived. OPPD should ensure it clarifies language regarding possession and/or access to the Policy and that it has an affirmative record on file indicating successful review of the current Policy by each employee.

The Policy provided by OPPD to BerryDunn and used in this review appears to be the most instrumental document in governing conduct and procedure for police activities and, therefore, BerryDunn has focused this review on that document. BerryDunn did not review any other possible manifestations of departmental policy or any of the Village's policies or procedures, other than those that might have been included in the Policy by reference and/or attachment. All OPPD employees are required to review the Policy in electronic form, although if or how this is acknowledged and/or documented is not indicated by the Policy. BerryDunn is aware of no other regulatory documents applicable to OPPD officers or other employees of the OPPD.

Each section of the Policy includes a header that details the date of issue, effective date, and any preceding Policy which it might rescind. Each Policy section includes a place for the Chief of Police to indicate approval via signature. The signature was missing from many or most of the Policy sections provided to BerryDunn for review. OPPD should ensure that all copies of Policy are signed by the Chief of Police or that the authority of Chief of Police is somehow otherwise indicated. Additionally, the Policy should be specific on how often review and update should occur, and each Policy should clearly indicate latest dates of review and update.

The OPPD is not currently accredited by the state's Illinois Law Enforcement Accreditation Program (ILEAP) or the Commission on Accreditation for Law Enforcement Agencies (CALEA). Based on staff interviews, BerryDunn learned that the primary reason for the lack of accreditation is that the current facility in use by the OPPD could not pass accreditation standards. Although the OPPD is not currently accredited, Policy Section 1.38 "Accreditation Manager, Duties and Responsibilities" does provide for a manager for the accreditation process and various Policy sections include references to CALEA standards.

OPPD Policy begins with a general disclaimer, and is followed by a Table of Contents, eight sections of policy by topics, a section for new or revised policy, and an Index. The Policy is divided into the following sections in this order:

1. Duties and Responsibilities
2. Administration
3. Property
4. Operations
5. Investigative Process
6. Information Systems
7. Communications

8. Support Systems

Policy Section 2.33 (Department Goals and Objectives) details the Department's mission, motto, goals, and objectives. Policy Section 2.16 (Police Ethics and Conduct) includes the Law Enforcement Code of Ethics and the Police Code of Conduct. Many agencies find that placing these foundational policies at the beginning of the Policy sends a strong message about core values and standards. OPPD should consider reorganizing the placement of these sections to emphasize their importance.

Overall, BerryDunn found the Policy to be comprehensive, professionally written, easy to locate, and structured to assist users in locating specific policies for guidance. The Policy is generally well-organized (in that individual sections are clearly titled and referenced in both a table of contents and an index) and placed within 8 broad topic sections with related topics. The Policy sections within those 8 topic areas, however, appear to be slightly random and topics are not organized such that related or commonly co-referenced topics are adjacent to each other. OPPD should consider re-organizing its Policy so that sections which support and complement each other are located in closer proximity, perhaps by using subcategories within the eight primary topic sections. In addition, upon general review, the Policy appears to be materially reflective of contemporary police practices.

For this Policy review, BerryDunn focused on three major objectives:

1. The overall organization of the Policy, with emphasis on a user's ability to easily locate subject matter.
2. The composition of the Policy in terms of its inclusiveness of relevant and contemporary topics, with emphasis on those orders that are critical to officer safety and accountability, and departmental liability.
3. Whether critical topics provide officers with enough guidance and direction to perform their duties in accordance with departmental requirements.

I. Critical Policies

In addition to a general review, BerryDunn reviewed the Policy for inclusion of several specific critical policy topics in two general categories—high-risk policies and emergent policies. The list of high-risk policies emanates from a study by Gallagher and Westfall, which identified the top risk areas for police departments from a litigation standpoint. According to the research by Gallagher and Westfall, these policy areas combine for 90% of litigation issues against police agencies. Emergent policies are those BerryDunn has identified as important for police operations, particularly as the demands within the profession continue to evolve.

High-Risk Policies

1. Off-Duty Conduct
2. Sexual Harassment-Discrimination

3. Selection/Hiring
4. Internal Affairs
5. Special Operations
6. Responding to the Mentally Ill
7. Use of Force
8. Pursuit/Emergency Vehicle Operator Course
9. Search/Seizure– Arrest
10. Care, Custody, Control/Restraint of Prisoners
11. Domestic Violence
12. Property-Evidence

Emergent Policies

1. Crime Analysis and ILP
2. Officer Wellness
3. LGBTQ Policies
4. Impartial Policing (Biased Policing)
5. Unmanned Aircraft Systems

BerryDunn located policies either directly titled relevant to all high-risk policy categories, or BerryDunn located a Policy section or sections containing direction that addresses the identified critical policy areas in a relatively thorough manner. Several high-risk policy areas include guidance scattered across multiple Policy sections. OPPD Policy would provide clearer guidance if such distributed policies were consolidated into single, comprehensive Policy sections as noted individually below, as appropriate.

Of the five listed emergent policies, BerryDunn found specific policies on two of them: crime analysis, and impartial or biased-based policing. BerryDunn did not locate specific policies which substantively address working with people who are LGBTQ, unmanned aircraft systems, or officer wellness.

Off-Duty Conduct

OPPD Policy does not include a specific, centralized and standalone policy regarding off-duty conduct. The Policy does include multiple references, notably within off-duty/secondary employment and social media policies, regarding off-duty conduct. While it appears that the Policy as a whole addresses some of the most significant aspects of off-duty conduct, this is an area of frequent confusion for employees and an area that often leads to complaints and investigations. Having dispersed, as opposed to consolidated, references to a critical high-risk

policy area such as off-duty conduct can lead to gaps in understanding and/or inconsistencies in conduct, especially as various Policy sections may be updated over time. Because there are multiple policies addressing off-duty behavior, off-duty behavior is a critical policy, and it is a policy to which officers often turn for guidance, BerryDunn recommends that OPPD develop a single policy which summarizes and references all policy regarding off-duty behavior in a single location for easy reference, consumption, and guidance.

Sexual Harassment - Discrimination

Policy Section 2.21 defines sexual harassment by state standards and states that any sustained finding of sexual harassment will result in “stern disciplinary action”. This policy would benefit from a clear statement prohibiting sexual harassment and an articulation of a zero tolerance policy. The Policy provides for bypassing the chain of command to report sexual harassment directly to Village Human Resources. Policy Section 2.05 (Civil Rights) also addresses components of sexual harassment and discrimination.

Selection/Hiring

The Policy contains multiple sections which address selection and hiring. Notably, Policy Sections 2.26 (Recruit Officer Training), 2.27 (Recruitment and EEOP), 2.28 (Personnel Selection), and 2.37 (Department Nepotism and Fraternization) address topics related to selection and hiring.

Internal Affairs

The Policy includes two significant sections which address internal affairs, complaints, and the administrative investigation process: Section 1.31 (Supervisor, Internal Affairs) is a job description which details many of the operational functions related to these topics. Section 2.06 (Complaint/Disciplinary Process) details the complaint and administrative investigation process.

The Definitions section describes a formal investigation as one which will result in dismissal or suspension in excess of three days. The definition of informal inquiry presumably includes all complaints which may result in suspension of three days or fewer, but this is not explicitly stated in the definition of informal inquiry. These definitions should be updated to reconcile with each other. Further, there does not appear to be a discipline matrix or other Policy guidance to help a decision maker determine what types of misconduct warrant various levels of definition. The lack of such guidance can make the judgment on classification of formal or informal investigations difficult and inconsistent, which can lead to a discipline process that is perceived as inequitable and/or one in which discipline is not upheld through appeals processes.

At a minimum, the Policy should define broad categories of what might result in discipline above or below this threshold for formal versus informal inquiry. Section V.A.1 states the Watch Commander will determine if a complaint will be designated as formal or informal. This function should have some system of review or oversight, such as a disciplinary committee, to help ensure that the judgment of the Watch Commanders is consistent with policy. The Policy includes a specific requirement that all supervisors reviewing a completed investigation determine whether a supervisor’s action contributed to the misconduct. This represents a best

practice which recognizes supervisors often have a significant and direct ability to prevent misconduct, which deserves oversight and accountability. Section B.5 refers to “abusive conduct”, but this term is not defined in the Definitions section or elsewhere. Section V.A.1 states citizen complaints shall be received by a supervisor. This section also needs a requirement that all employees shall notify a supervisor immediately upon notification of anyone’s desire to make a complaint, so that a supervisor can fulfill the requirement of this section. The Policy includes an expectation that investigations will be completed within three weeks. This is a laudable policy because timely investigations and discipline contribute to an effective discipline process that is more likely to be perceived as fair and equitable. OPPD should conduct periodic reviews to determine if this policy standard is being met consistently and, if not, the Policy should be adjusted to reflect practical reality.

In addition to the above information, BerryDunn has also provided the OPPD with Recommendation 11-1 titled Complaint Intake. This recommendation was provided to the OPPD as part of the Emergent Issues memo.

Special Operations

Policy Section 1.26 (Special Operations Coordinator, Duties and Responsibilities) outlines the job description including specific operational tasks of the employee designated to administer special operations functions. There are numerous references in other Policy sections to functions relating to special operations such as section 4.56 (All Hazards).

Responding to the Mentally Ill

Section 8.12 (Crisis Intervention Team) describes the department’s procedures for responding to events involving persons with mental illness. Section 8.03 (Family Service and Mental Health Center of Oak Park) describes procedures for various referral, support, and service options that might assist response to persons with mental illness.

Use of Force

Policy Section 4.38 (Use of Non-Lethal/Less-Lethal Force) describes the use of force other than deadly force, while Section 4.08 (Deadly Force) describes policy for use of deadly force. Together, these two sections provide comprehensive guidance on topics involving the use of force. It is a bit unusual that such closely related topics are separated in the Policy and not found adjacent to each other for clear and easy reference. BerryDunn expands on its analysis of OPPD’s Use of Force policy under the discussion of the National Consensus Use of Force Policy and the “8 Can’t Wait” Core Policies later in this report.

Pursuit/Emergency Vehicle Operator Course

The following Policy sections address emergency vehicle operations: 4.30 (Responding to Emergency Calls), 4.27 (Operation of Police Vehicles), 4.51 (Motor Vehicle Pursuits).

Search/Seizure– Arrest

OPPD Policy does not include a single, comprehensive policy addressing arrest, search, and seizure policies and procedures. Several Policy sections—including Section 2.05 (Civil Rights), Section 5.12 (Interrogation, Field and Custodial) and others—address pertinent topics about arrest, search, and seizure issues and procedures. BerryDunn recommends elsewhere in this report that OPPD develop policy and procedure to document all non-consensual encounters. BerryDunn further recommends here that OPPD include specific and consolidated Policy guidance that requires documentation of all detentions and all non-consensual law enforcement-related encounters in a manner that is consistent, archivable, and searchable, and which includes both demographic data and details on officer actions, such as frisks or searches (both consensual and otherwise).

Additionally, there does not appear to be a specific policy or detailed procedures governing the conduct of consent searches. Consent searches are frequently the source of complaints about disparate treatment. As outlined separately in Recommendation 5-8, BerryDunn recommends OPPD update its Policy to include specific guidance on consent searches including a requirement for documenting consent (either in writing or on video) and a process for analytical review of consent searches to identify any potential patterns in outcomes, including effectiveness and equity. Considering the importance of this policy area, OPPD should consider consolidating arrest, search, and seizure policies into a single, centralized policy, and reference that policy as necessary in other Policy sections.

Care, Custody, Control of Prisoners

OPPD Policy includes multiple sections with references to the care, custody, and control of prisoners with the primary one being Section 4.55 (Transport of Prisoners), which directly addresses the care, custody, and control of prisoners. The Policy would benefit by having a stand-alone policy addressing the fundamental requirements for the care, custody, and control of prisoners.

Domestic Violence

Section 4.10 (Domestic Dispute Intervention) describes policy and procedures for responding to calls for service related to domestic violence. This section includes detailed guidance on procedures for responding to domestic violence events, including referrals for support services. The Policy does not make any mention of the department's position on making dual arrests during the field investigation of domestic violence. OPPD should update its Policy to reflect its stance on dual arrests, taking into consideration that it is widely considered best practice to prohibit dual arrests or, absent of such a prohibition, to strongly discourage dual arrests and require on-scene supervisor approval before dual arrests are initiated.

Policy Section 4.11 addresses calls for service related to domestic violence involving members of the OPPD. Having a law enforcement-perpetrated domestic violence policy is a best practice that is not yet ubiquitous at police departments in the United States, and BerryDunn acknowledges the OPPD for having a specific policy addressing law enforcement-perpetrated

domestic violence. Survivors often recount that their decision on whether and how to engage the criminal justice system includes a perception of how members of law enforcement, tasked with enforcing domestic violence laws, are held accountable to those same laws. How police departments hold their own members accountable for domestic violence can contribute directly to community members' perception of the existence of procedural justice, which contributes to their willingness to report domestic violence. Consequently, OPPD should consider this policy as an opportunity to highlight language that clearly expresses a zero tolerance approach to law enforcement-perpetrated domestic violence.

Property/Evidence

Policy Section 3.02 (Inventory System for Property Control) addresses property and evidence control procedures.

Crime Analysis and Intelligence-Led Policing

Policy Sections 1.41 (Crime Analyst, Duties and Responsibilities) and 4.57 (Crime Analysis) address crime analysis.

Officer Wellness

OPPD does not have a specific officer wellness policy, but Section 8.1 (Police Chaplaincy Unit) addresses aspects of officer wellness, as do other references to topics such as Employee Assistance Programs in other parts of Policy.

LGBTQ Policy

There are several references to the rights of the LGBTQ community throughout the Policy, but it does not include a specific section on the LGBTQ community. There are practical and operational aspects of engaging people in the LGBTQ community which are appropriate to outline in the Policy. Those include issues such as person searches, personal pronoun references, detention location (male or female population), and use of restrooms, to name just a few. Other considerations might include a policy relating to staff members who may be in the midst of gender transition. Because of the sensitive issues that surround those within the LGBTQ community, BerryDunn recommends OPPD consider developing a separate policy for responding to this segment of the population.

Impartial Policing Policy

Policy Section 2.17 (Prohibition Against Bias Based Policing) addresses impartial policing and clearly prohibits biased-based policing with specific and detailed guidance on this topic. BerryDunn has encountered no evidence to suggest OPPD engages in impartial policing. In order to help ensure OPPD is able to respond to any future possible concerns regarding this topic, it is vital that the agency have adequate information on police encounters. Without comprehensive data on all police encounters, any agency is at a significant disadvantage to provide sophisticated analysis of its performance regarding impartial policing. As noted previously in this report, BerryDunn recommends including a clear and specific policy that requires documentation of all detentions and non-consensual law enforcement-related

encounters, in a manner that is archivable, searchable, and includes both demographic data and details on officer actions such as frisks or searches. BerryDunn also recommends including policy that all consent searches require written or video-recorded affirmative consent.

Unmanned Aircraft Systems

OPPD does not have any policy regarding unmanned aircraft systems.

Victim Services/Victim Assistance

While not included among the high-risk or emergent policies isolated for specific review and comment, it can be beneficial to assess an agency's policy regarding supporting victims of crime. OPPD Policy includes Section 8.05 (Family Service and Mental Health Center of Oak Park), which addresses procedures for making referrals for services to victims.

II. Analysis of Use of Force Policy – National Consensus Policy

In 2017, amid significant debate concerning variations in use of force practices and policies across the nation, several law enforcement groups convened to develop a model policy that would help improve uniformity regarding police uses of force across the profession. The organizations involved in these discussions included the following:

- Association of State Criminal Investigative Agencies
- The Commission on Accreditation for Law Enforcement Agencies
- The Fraternal Order of Police
- The Federal Law Enforcement Officers Association
- The IACP
- The Hispanic American Police Command Officer's Association
- International Association of Directors of Law Enforcement Standards and Training
- National Association of Police Organizations
- National Association of Women Law Enforcement Executives
- National Association of Black Law Enforcement Executives
- National Tactical Officers Association

The convening of such a group, and their agreement on a model policy of this nature, is unprecedented within the law enforcement industry. Although there are aspects of the National Consensus Policy that some may disagree with, it is BerryDunn's position that, as a whole, this model provides strong guidance for law enforcement agencies to consider within the context of their operational policies and procedures. As part of this assessment, BerryDunn evaluated the OPPD's Use of Force policy against the National Consensus Policy.

The OPPD has a well-written and comprehensive Use of Force policy in its Non-Lethal/Less-Lethal policy (4.38) and its Deadly Force policy (4.08), with specific guidance on topics such as reverence for life, value of life over property, warnings, warning shots, de-escalation, alternatives, and medical aid. Several other policies (e.g. conducted electrical weapons) provide guidance on topics related to the use of force.

This portion of the report is intended to provide observations to the OPPD concerning areas of its Use of Force policy relative to the National Consensus Policy, which may be valuable to consider in terms of adjusting or revising the OPPD Policy. Although BerryDunn acknowledges that the National Consensus Policy is very good, BerryDunn also recognizes there are nuances within each agency that call for customization of various aspects of department operations. BerryDunn's recommendation in this section is for the OPPD to review this information in relation to its own Policy, and to consider appropriate adjustments. This section should not be construed as a mandate for the OPPD to adopt the National Consensus Policy, in whole or in part.

Upon review and using a comparison of the National Consensus Policy, BerryDunn makes the following observations and recommends the OPPD consider the following areas for possible adjustments and clarifications to the OPPD Policy:

- The National Consensus Policy on Use of Force states that all officers shall receive training, at least annually, on the agency's Use of Force policy and related legal updates. OPPD Policy includes multiple references to maintaining proficiency and training on use-of-force-related topics, but does not clearly indicate policy requirements about frequency, amount, and specific topics. BerryDunn recommends the Use of Force policy, in particular, be enhanced to clearly state frequency of required recurring training, and any required re-certifications regarding use-of-force-related policy, procedures, and skills. Policy should require concurrent training on related legal updates. Policy should require that all use of force training be provided in a manner designed to provide techniques for the use of de-escalation techniques. Policy should require that training include simulation of actual shooting situations and conditions. Policy should require that training be designed to assess and enhance officers' discretion and judgment in using less lethal and deadly force in accordance with this policy.

- OPPD Policy does not specifically prohibit chokeholds, strangleholds, carotid restraints, or other techniques which may involve restraining an individual in such a manner as to choke or restrict breathing. The National Consensus Policy on Use of Force defines "Choke Hold" as:

  > ***A physical maneuver that restricts an individual's ability to breathe for the purposes of incapacitation. This does not include vascular neck restraints.***

  BerryDunn recommends that OPPD update its Policy to specifically define and articulate a prohibition on chokeholds in all circumstances unless deadly force is authorized.

- The following terms are identified within the National Consensus Policy. While OPPD Policy makes reference to several of these terms within its Policy, they are not clearly

and independently defined. Note that there are definition sections included throughout the Policy. Users of the Policy would be better served if it included a single, comprehensive definition section which would allow easy reference by users and simultaneously ensure consistent definition and use of important and commonly used terms. The definitions could be repeated in various sections for ease of reference. BerryDunn recommends OPPD add or update definitions to reflect these terms more precisely and consistently:

- **Excessive Force:** Force which is not objectively reasonable. (Note that OPPD Policy defines "brutality" and uses "excessive force" within Policy. Consistent terminology should be used and defined clearly.)
- **Exigent Circumstances:** Those circumstances that would cause a reasonable person to believe that a particular action is necessary to prevent physical harm to an individual, the destruction of relevant evidence, the escape of a suspect, or some other consequence improperly frustrating legitimate law enforcement efforts.
- **Choke Hold:** A physical maneuver that restricts an individual's ability to breathe for the purposes of incapacitation. This does not include vascular neck restraints.
- **Objectively Reasonable:** The determination that the necessity for using force and the level of force used is based upon the officer's evaluation of the situation in light of the totality of the circumstances known to the officer at the time the force is used, and upon what a reasonably prudent officer would use under the same or similar situations.
- **Warning Shot:** Discharge of a firearm for the purpose of compelling compliance from an individual, but not intended to cause physical injury. Warning shots should be clearly and expressly prohibited.

"8 Can't Wait" Core Policy Solutions

In addition to the National Use of Force Consensus Policy, BerryDunn also examined the OPPD Use of Force policy against the specific core policy enhancement recommended by the "8 Can't Wait" initiative. This initiative comes from Campaign Zero, an organization that has been an advocate for limiting police interventions, improving community interactions, and ensuring accountability for police officers, and ultimately, reducing deaths that result from police actions.

The website for "8 Can't Wait" suggests that more restrictive use of force policies, accompanied by comprehensive training, meaningful oversight, and consistent accountability, can reduce deadly use of force encounters by police and save lives while promoting collaborative and procedurally just policing; BerryDunn agrees. Indeed, the elements mentioned reflect best practices within the law enforcement industry, and they should be an imperative for every police administrator.

More restrictive use of force policies accompanied by comprehensive training, meaningful oversight, and consistent accountability can reduce deadly use of force encounters by police and save lives while promoting collaborative and procedurally just policing.

The following policies championed by Campaign Zero's "8 Can't Wait" initiative demonstrate the potential to dramatically reduce fatal police encounters:

1. Require all alternatives be exhausted before shooting.
2. Require all use of force be reported.
3. Prohibit chokeholds and strangleholds.
4. Require use of force continuum.
5. Require de-escalation.
6. Require duty to intervene.
7. Prohibit shooting at moving vehicles.
8. Require warning before shooting.

BerryDunn has reviewed OPPD Policy to determine whether it has addressed these eight core policy areas. BerryDunn finds that OPPD Policy addresses all of them to some extent, except for prohibiting chokeholds or strangleholds, and, to a lesser extent, requiring exhaustion of all alternatives before shooting. Although OPPD Policy does address seven of the eight recommendations, some clarification and enhancement to existing policies may be warranted. It is important to note that the efficacy of these core policy areas is dependent on consistent reporting, oversight, and accountability of the behavior addressed.

All alternatives exhausted before shooting

OPPD Policy Section 4.08 (Deadly Force) states:

> *"The use of deadly force is the most serious act in which a law enforcement officer will engage. It has the most far-reaching consequences for all of the parties involved. Therefore, it is imperative not only that officers act within the boundaries of legal guidelines, ethics, good judgment, and accepted practices but, also, that they be prepared by training, leadership, and direction to act wisely whenever using deadly force in the course of their duty. A reverence for the value of human life shall guide officers in considering the use of deadly force. While officers have an affirmative duty to use that degree of force necessary to protect human life, the use of deadly force is not justified merely to protect property interests."*

This section also states that officers will not fire weapons if it subjects bystanders to possible injury, and requires a warning, if feasible, before use of deadly force. This section prohibits warning shots and firing at or from moving vehicles. While this section alludes to the importance of using discretion when deploying deadly force, it does not specifically require officers to

exhaust all alternatives prior to using deadly force when possible. BerryDunn recommends OPPD update this Policy section to include this requirement.

Comprehensive reporting of all use of force

OPPD Policy Section 4.38 (Use of Non-Lethal & Less-Lethal Force) Subsection IX (Reporting the Use of Non-Lethal Force) requires reporting of all force, including:

- Force resulting in injury, claimed injury, or death
- Use of OC Spray
- Deployment of CEW
- Use of Less-Lethal Extended Range Impact Devices
- Use of ASP baton as impact force
- Anytime subject is charged with resisting arrest

There is no clear and specific requirement that officers who *witness* use of force must document their observations, nor is there indication of *when* use of force reporting must be completed. BerryDunn recommends a policy requiring all employees to report any use of force immediately, and that policy clearly require any employee who witnesses a use of force to document it thoroughly.

BerryDunn recommends elsewhere in this report that the OPPD require documentation of all non-consensual law enforcement encounters. While that recommendation is about encounters, not uses of force, the accumulation of use of force data complements this recommendation to support periodic analysis of both biased-based profiling and use of force.

Chokeholds and strangleholds

OPPD Policy does not address chokeholds. A word search of the entire Policy found no reference to “choke”, “strangle”, “carotid”, or “vascular”. BerryDunn recommends OPPD clarify Policy to specifically prohibit chokeholds and strangleholds, using clear definitions and direction.

Use of force continuum

OPPD Policy Section 4.38 (Use of Non-Lethal & Less-Lethal Force) Subsection VII (Escalation of Force) clearly defines and lays out a continuum of force, including a requirement to de-escalate as threats or resistance diminish.

De-escalation

OPPD Policy Section 4.38 (Use of Non-Lethal & Less-Lethal Force) states, *“Police officers, whenever possible, will exercise de-escalation techniques, persuasion, advice and warning prior to the use of non-lethal physical force.”*

Duty to intervene

OPPD Policy Section 4.67 (Emergency Restraint Chair) Subsection IV (Duty to Intercede) states:

> *"Any officer present and observing another officer using force that is clearly beyond that which is objectively reasonable under the circumstances shall, when in a position to do so, intercede to prevent the use of unreasonable force. An officer who observes another employee use force that exceeds the degree of force permitted by law should promptly report these observations to a supervisor."*

This Policy clearly requires officers to intervene when observing excessive force, but its location in the Policy section about emergency restraint chairs is confusing. This policy could be hard for employees to locate, and could cause confusion that it only applies to this specific function. BerryDunn recommends this Policy requirement be moved to the Use of Force section and/or the Code of Conduct section.

Shooting at moving vehicles

OPPD Policy Section 4.08 (Deadly Force) states, *"Discharging a firearm from, or at, a moving vehicle is prohibited, unless the occupant, or occupants, of the other vehicle are using deadly force against the officer or another person."*

Warning before shooting

OPPD Policy Section 4.08 (Deadly Force) requires, *"Prior to utilizing deadly force, the officer, where feasible, shall provide a clear and audible warning to the perpetrator(s) of criminal activity to desist."*

III. Policy Advisory Committee

As noted, OPPD has an extensive and thorough policy. Those governed by the rules have a vested interest in the development of the standards for which they will be held accountable and expected to follow. These same individuals often possess significant operational knowledge that leaders can call upon in the development of such processes. It is BerryDunn's position that those who do the work on a consistent basis have the best vantage point from which to construct the rules and operating guidelines regarding operational functions. Persons in front-line positions often have ideas or suggestions, which, if not for their inclusion in the process, would be unknown to policy makers. Additionally, those involved in the development of those rules will be more likely to understand and embrace them.

Consequently, BerryDunn recommends OPPD establish a formal committee responsible for review and input on any significant policy change or development of new policy. This committee should be made up of a cross-section of operational personnel, including both sworn and professional staff. All significant policy revisions, additions, deletions, or other modifications should be subject to the review of this committee. However, this committee should not completely replace the need to consult with subject matter experts within or outside the department, should the policy require additional review, scrutiny, input, or buy-in from others.

In addition, just as BerryDunn recommends inclusion of those within the department as an advisory arm of policy construction, the OPPD should also consistently engage the public in the process of developing or revising critical agency policies. In keeping with the co-production policing philosophy, BerryDunn suggests the OPPD adjust current policy and practices to regularly engage the public in policy decisions.

Summary

BerryDunn conducted a general and limited review of the current OPPD policy with regard to its organization, relevance to industry standards, and key policy areas. Based on that review, BerryDunn noted some policy areas in which adjustments should be considered. BerryDunn recommends that the OPPD consider making changes to the policy based on the review

The policy review BerryDunn conducted was general in nature, as are the recommendations. None of the information in this section should be considered legal advice, and BerryDunn recommends that the OPPD discuss any policy adjustments with its legal advisors prior to adoption and/or implementation.

Recommendations

This section provides the three formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 7.1: Chapter 7 Recommendations

Operational Policies		
No.	**Policy Revisions**	**Overall Priority**
Chapter 7, Section I: Critical Policies		
7-1	**Finding:** There are several areas within the OPPD policies or procedures that are either lacking, missing, or should be considered for revision. The OPPD has a good policy manual that is well-structured and designed, and it provides appropriate and relevant guidance for personnel. However, there are numerous policies the OPPD should examine for completeness, modification, or creation. **Recommendation:** The OPPD should review BerryDunn's findings and recommendations concerning department policies, and consider adding or amending policies based on that review. BerryDunn is aware that the OPPD is in the process of moving to a new policy platform (Lexipol). This process is incomplete and is not expected to be finalized during this project. Accordingly, BerryDunn and the OPPD agreed upon a strategy for policy review that referenced its current manual, including any associated recommendations. The OPPD will refer to BerryDunn's recommendations in its	

process of implementing Lexipol for the department.

A set of complete, contemporary, and understandable policies to guide staff in fulfilling their public safety mission is a critical element of every police agency. The policies should prescribe expectations for staff, clearly defining what they can, cannot, should, or should not do. The policies should be consistent with state and federal law, best practices within the police profession, and to the extent it is lawful, they should align with community desires, needs, and standards. Developing a set of guiding policies that conform to these interests is an arduous task, but one that is necessary to help ensure uniformity and fairness in policing practices and accountability for those who do not abide by them.

Although there are foundational elements surrounding most police practices (e.g., pursuits, emergency driving, domestic violence), there are many nuances that should be considered. Accordingly, developing or modifying policies should be a collaborative effort that involves thorough discussion and consideration with all concerned stakeholders, including those who must enforce and follow the policies (staff), and those affected by them (the community). Because there are many variations, possibilities, and opinions on policy development, BerryDunn favors a process in which the agency is responsible for these actions. As a result, BerryDunn has offered many best-practice areas of consideration for the OPPD without detailed recommendations on which provisions should or should not be included. BerryDunn recommends that the OPPD evaluate the following policy areas for development or revision:

- Off-Duty Conduct
- Sexual Harassment-Discrimination
- Internal Affairs/Professional Standards
- Search/Seizure– Arrest
- Domestic Violence
- Officer Wellness
- LGBTQ Policy
- Impartial Policing Policy
- Unmanned Aircraft Systems
- Victim/Witness Assistance
- Use of Force
    - “8 Can’t Wait” Policies

Although BerryDunn acknowledges OPPD’s desire to replace its current policy system with Lexipol, and doing so is a complex task, BerryDunn notes that as indicated above in this recommendation (and a separate recommendation), policy development should be a collaborative process, both internally and externally. From a timing perspective, it may be prudent for the OPPD to implement the Lexipol manual without extensive collaboration in advance. However, if the OPPD opts to do so, BerryDunn recommends the OPPD expose the manual to the community for open input and feedback. Following any input, the OPPD should

Operational Policies		
	consider whether additional collaboration, discussion, and possible policy revision are warranted, and if so, the OPPD should initiate a formal process to engage those steps.	

Operational Policies		
No.	**Policy Manual**	**Overall Priority**
Chapter 7, Section I: Critical Policies		
7-2	**Finding:** Because the OPPD is using a mix of policies from its current manual and a new source (Lexipol), staff lack clarity on prevailing policy, and in some cases, lack policy understanding.	
	Recommendation: The OPPD should implement practices to ensure that staff are clear on which policies are in force and provide training so that staff understand the contents of all policies they are responsible for following.	

Operational Policies		
No.	**Collaborative Policy Development**	**Overall Priority**
Chapter 7, Section III: Policy Advisory Committee		
7-3	**Finding:** The OPPD does not have a formal process that intentionally seeks input, both internal and external, on policy revisions and development, and there is not a clear pathway for department members to recommend policy additions/revisions and to receive feedback. Changes in policies and procedures materially affect those who must carry out the work. Those who do the work are in the best position to recognize how changes will alter or affect the work they must perform. Persons who perform the work often have insights into details of the work, which should be considered during policy revision or development processes. Co-production policing practices also suggest the inclusion of the public in key policy decisions. Policy review and development does not currently or consistently incorporate significant feedback from the community,	
	Recommendation: The OPPD should develop a formal process to solicit input from OPPD staff on any significant policy revision, or when considering the development or adoption of any new policy. The policy should also consider community involvement in major policies that will affect them.	

Chapter 8: Data, Technology, and Equipment

Data, Technology, and Equipment: includes a review of agency software and related technology resources, and access/use of crime and other call for service data for operational purposes. Includes a review of department equipment, facilities and space utilization, and fleet services.

During this assessment, BerryDunn asked staff about the availability and use of technology within their work processes. BerryDunn found that although officers embraced the technology available to them—and, in fact, hoped for system enhancements that could improve their capacity to perform their jobs—the current technology in use by the department could be improved. This is true for both the equipment and software used by the department.

I. Data and Technology

Software

The backbone of all effective police data functions is a robust RMS. Police agencies with a good RMS that is integrated with other field technologies are able to create operational efficiencies that save time and effort for staff. Proper use of these systems can be valuable in assessing a variety of police functions, and they can help agencies combat crime more effectively. During this assessment, BerryDunn learned that the RMS in use by the OPPD is not supporting operational needs and it has multiple limitations, particularly in the areas of data entry and data mining, both of which are critical to leveraging data in support of operations, transparency, and impartial policing.

At several points during the data gathering process, BerryDunn learned that the OPPD did not have the ability to extract important data from its own systems. These limitations exist for a combination of reasons, which include the system design, system knowledge and training, and overall system functionality. These factors limit the ability of the OPPD to enter, extract, and analyze numerous data, many of which are vital to police operations, and for transparency and monitoring of impartial-policing practices.

Most modern RMS software products have significant capabilities and BerryDunn has provided a sample list of the common features in Section 2 of the OARM document. Although the current RMS in use by the OPPD does satisfy some of those elements, the system is outdated, and support from the vendor has been focused on newer products in its suite (end-of-life support for this product could occur at any time).

Based on BerryDunn's observations, the OPPD should pursue acquisition of a more modern and robust RMS that is capable of supporting its data needs. BerryDunn also notes here that acquiring a new RMS is not a small task. Doing so requires substantial time and planning and involves multiple significant steps. BerryDunn recognizes these challenges and acknowledges that the OPPD cannot remain in a state of stasis as efforts to acquire a new system proceed. Accordingly, BerryDunn recommends that the OPPD cautiously make necessary adjustments to its current RMS to support immediate operational needs, while simultaneously pursuing a replacement system.

Additionally, because of the critical integration between RMS and CAD, the Village should also examine the CAD (and mobile) system to determine whether it is capable of meeting the current and emerging needs of the OPPD. Give the noted constraints with the RMS, it is likely that CAD has similar functional challenges, which may also suggest the need for replacement.

BerryDunn is aware that the OPPD has sought external support to maximize the use of its current RMS system. This is no-doubt providing the department with some much-needed expertise. Despite this, BerryDunn cautions the Village about making a substantial investment in the current system, as it is likely that regardless of that effort, the system will not perform at a level that is commensurate with the future needs of the OPPD. However, there are several areas the OPPD should consider adjusting now, and/or as part of pursing a new RMS.

Equipment and Field Reporting

As part of this assessment, BerryDunn asked the OPPD to complete a technology survey designed to capture the field-reporting capacity of the law enforcement agency. The maximum score for this instrument is 100, or 115, when all possible bonus points are included. The OPPD scored a 49 using this assessment instrument.[126] This is a comparatively low score, and it indicates a significant opportunity for expanding field technology use to improve the effectiveness of officers in the field. Areas for improvement include:

- Functioning computers in each patrol vehicle
- Persistent high-speed internet in each patrol vehicle
- In-car cameras in each patrol vehicle
- Adding GPS and a CFS mapping feature for each patrol vehicle
- Improved RMS and other software integration
- Adding driver's license readers to each patrol vehicle
- Providing a functioning e-Citation program for each vehicle, including expanding the use of the e-Citation program to record written and verbal warnings for all traffic and other subject stops
- Providing an automated data push from e-Citation to RMS
- Providing other custom forms and printing from each patrol vehicle

Each of these categories has the capability of improving operational effectiveness and efficiency, and the OPPD should pursue the use or expansion of these functionalities. More

[126] SDI Table 8.1

importantly, each of these areas are common field technology applications, and they are readily available within the industry.

As BerryDunn noted in Chapter 5, the OPPD has not been consistently collecting IPD or non-consensual subject contacts. This is a critical part of the OPPD's efforts in monitoring and addressing any impartial policing concerns. However, the current system in use by the OPPD requires entry into different systems, and this creates a variety of inefficiencies. As the OPPD pursues technology solutions, the department should also revise its IPD entry portal, to consistently capture this information more easily.

II. Crime Analysis

During this assessment, BerryDunn examined the capture, analysis, and use of crime and response data within OPPD. Using a data-driven philosophy to inform policing and personnel deployment strategies has become a standard throughout the policing industry, and these processes have proved to contribute to the effective and efficient use of organizational resources. Utilization of a professional performance measurement and accountability management system is supportive of both community-oriented/problem-oriented policing and data-driven/intelligence-led policing (ILP) strategies because it imposes accountability for outcomes on department personnel.

ILP refers to the use of data in the deployment of police resources and personnel, and this has become a best practice in modern law enforcement. ILP broadly consists of gathering information or data, converting that information/data into usable intelligence through analysis by trained professionals, and then using that intelligence to guide decision-making by executives and commanders to positively influence public safety objectives that support the mission of the department and the needs of the community.

It is important that the OPPD utilize its available technology appropriately and use data and intelligence in decisions and deployment strategies. However, the department also should develop a culture of data-driven decisions and ILP at all levels. Although it is important for the chief and other department personnel to use data to make operational decisions, ILP calls for officers at all levels to use data to make decisions, solve community problems, and solve crimes.

BerryDunn is aware that the OPPD has a desire to engage ILP strategies more effectively, and that the OPPD has held crime-abatement meetings in the past. However, the OPPD has not formally, intentionally, and consistently used data, intelligence, or quantitative methods in an organized or meaningful way. Additionally, at the time of this study, OPPD had not formally developed an operating performance measurement and accountability management system (often referred to as CompStat). In order to do this most effectively, the OPPD needs to receive specialized training for command staff and analysis professionals, deploy more deliberate use of data, understand how to develop data into intelligence, identify best practices for implementation, and identify and employ performance metrics that support top-level strategic goals and department vision.

As mentioned previously, OPPD has a crime analyst for the department. Although the department has sporadically used some crime data in developing its policing strategies, there are significant opportunities to improve the use of data for ILP. To assist the OPPD in further developing its ILP program and strategy, including the use of crime meetings, BerryDunn has provided an extensive sub-report on this topic, which can be found in Section 6 of the OARM document. BerryDunn recommends that the OPPD use this resource to further refine and develop its ILP philosophy, along with the appropriate policies and procedures to help ensure that it is prioritized as an element of the operational culture of the organization.

III. Department Equipment and Facilities

During this assessment, BerryDunn had an opportunity to discuss the equipment available and in use by the department, and to discuss facilities, space utilization, and fleet issues with officers.

Numerous officers and staff commented to BerryDunn positively about the equipment available to them. This included vehicles, personal equipment, department equipment, and technology. Although some commented that certain equipment could be improved, particularly with regard to technology, most reported they had sufficient equipment to do their jobs, even if they felt an upgrade would be helpful. Also, as previously recommended, there is a need to perform a technology needs assessment with staff to close any noted gaps.

The operational assessment BerryDunn is conducting for the Village includes a review of the OPPD facility. The team from BerryDunn had an opportunity to tour the police facility during a planned on-site visit. During the tour, BerryDunn noted numerous challenges with the current police facility that adversely affect efficient and effective operations. BerryDunn observed issues in the following areas:

- Site security
- Operational flow
- Interview rooms
- Training and meeting rooms
- Storage
- Evidence preparation, intake, and management
- Holding cells
- Transport access
- Locker rooms and facilities

The observed deficiencies in these areas work against operational effectiveness and create various liability and safety risks for Police Department and Village staff. Additionally, it is likely that many of these issues are not correctable, given the limitations of the current space.

At the request of the Village, BerryDunn prepared a summary report that was provided to the Village as part of the Emergent Issues Memo. BerryDunn's observations in the memo represent an overview of readily observable facility conditions. However, BerryDunn's facility report was not intended to outline the entirety of the shortcomings of the current facility, nor was it intended to fully express the operational needs of the OPPD, including space requirements. Despite these limited parameters, BerryDunn recommends that the Village pursue plans for a new police facility to aid the efficient and effective delivery of public safety services to the Village and its residents and visitors.

IV. Fleet Management

BerryDunn had general discussions with several staff regarding the OPPD's fleet of vehicles. Staff explained that vehicle maintenance is appropriate, and replacement occurs as a result of analyzing vehicle age, mileage, and repair costs. Although this is the typical process, replacement relies on the availability of vehicles to replace those being cycled out of service. This process is highly susceptible to budgetary fluctuations at the Village level, which can affect whether the department is able to keep up with vehicle replacement demands. Accordingly, it is important the department closely monitor its fleet needs, and diligently budget for replacements.

BerryDunn asked the OPPD to provide information regarding its fleet of vehicles. The OPPD has a wide range of vehicles available within its fleet, including dedicated patrol cars and unmarked and specialty vehicles.[127] BerryDunn also asked the OPPD to provide data on its budget for fleet acquisition and replacement. The data provided reflects a five-year budget for fleet replacement, which is typical with most police agencies.[128] This budget appears to meet the needs of the police department.

BerryDunn recognizes that fleet maintenance and budgeting is a challenge. Police vehicles, particularly patrol vehicles, are costly to acquire and to maintain. However, as with many other operational functions, efficient fleet management optimizes these costs and helps ensure that staff have reliable vehicles to use in their activities. BerryDunn notes that an equipment replacement fund for police vehicles is a way to balance annual costs and more efficiently manage fleet operations, and the Village should move toward establishing a fund of this nature.

Summary

During this project, BerryDunn identified several opportunities for improvement for the OPPD related to data, technology, equipment, and facilities.

The RMS in use by the OPPD is not supporting operational needs. The RMS has multiple limitations, including data entry and data mining, both of which are critical to leveraging data in

[127] SDI Table 8.2
[128] SDI Table 8.3

support of operations and impartial policing. There are several areas the OPPD should pursue to improve its current RMS, while simultaneously seeking replacement of this system.

The use of field technology by the OPPD can be improved in multiple areas. Doing so will help improve various efficiencies for the department.

The OPPD has two portals for entering impartial policing data: the racial profiling (impartial policing) portal, and the field contact portal. The two portals collect similar data, and there has been confusion among officers on which to portal to use when, and for what purpose. The OPPD would benefit from consolidating these portals into one, to help the department more efficiently and effectively collect IPD.

Best practices include utilizing ILP data to inform community needs and policing practices. Although the OPPD has engaged some efforts in this area, there is an opportunity to formalize this process to make better use of available data. Additionally, the OPPD should provide appropriate system access to crime analysts to access all relevant OPPD data, and the OPPD should provide appropriate training to crime analysts to access, retrieve, and evaluate operational and impartial policing data.

There are numerous challenges with the current police facility, and it does not contribute to efficient and effective operations. More importantly, several security risks in the facility are likely uncorrectable, which create various liability and safety concerns for the Village and staff.

Recommendations

This section provides the six formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 8.1: Chapter 8 Recommendations

Data, Technology, and Equipment		
No.	**RMS**	**Overall Priority**
Chapter 8, Section I: **Data and Technology**		
8-1	**Finding:** The RMS in use by the OPPD is not supporting operational needs. The RMS has multiple limitations, including data entry and data mining, both of which are critical to leveraging data in support of operations and impartial policing.	
	Recommendation: The OPPD should pursue acquisition of a more modern and robust RMS that is capable of supporting its data needs.	

Data, Technology, and Equipment		
No.	**RMS Configuration**	**Overall Priority**
Chapter 8, Section I: Data and Technology		
8-2	**Finding:** There are significant limitations to the RMS currently used by the OPPD. The OPPD can overcome some of these limitations through system configuration and process revisions. **Recommendation:** The OPPD should make revisions to its RMS and processes, to improve the effective use of the RMS. Areas for revision include: • RMS Access: A primary limitation of the RMS is that most staff, including patrol officers, cannot access it directly. Although staff can access RMS using the mobile computer terminal (MCT), this access has its limitations and is insufficient. Staff access is a configuration issue which can be adjusted easily by personnel with system administration rights; BerryDunn recommends making this adjustment. • RMS Security: A specific security group should be added for patrol that allows access to appropriate files, but restricts staff from inadvertently or intentionally deleting important information. • Patrol Queue: At present, patrol officers do not have a queue within RMS for returned reports or for assignment of cases for follow-up or investigation. This is also a configuration issue that can be easily resolved. BerryDunn recommends making this adjustment. • Remote Access for Patrol: Providing RMS access and an officer queue are important, but these should also be accessible from the field. Officers should have the ability to access the full RMS from their patrol units, not only through the RMS interface built into their MCT mobile platform. The OPPD should work with IT to develop a secure path for full RMS access from the field. • Solvability Factors: As recommended elsewhere in this report, patrol should be required to complete the Solvability Factors section for every criminal incident. This section is currently not available to officers, because it is contained within RMS and officers do not have access to the system. The OPPD should take steps to add the Solvability Factors section to the interface officers use to create an incident report. This will likely require vendor or other technical support. • Report Process: Currently, when an officer completes an incident report, that report is routed to a supervisor for approval. Once approved, the report is forwarded to Records for additional action. While the report is in an action status with Records, it is generally not accessible to those who might need to review it. This is due to configuration settings that limit the admission of the report into the full RMS until Records staff have processed it. This restriction creates various operational challenges and it should be changed. When reports are approved by the supervisor, they	

Data, Technology, and Equipment		
	should automatically import into RMS. Once there, Records staff can still perform any data validation functions, without restricting personnel from access to the documents. This is a configuration issue that can be resolved by a person with administrative rights and system knowledge. BerryDunn recommends making this adjustment. • Procedures and Training: These configuration adjustments will require the OPPD to thoughtfully consider any associated business processes. Adjusting these processes should be done in collaboration with relevant administration and users. In addition, after these adjustments are made, it will be critical that the OPPD provide clear training to staff on the new processes, particularly access to RMS and the associated functions that patrol staff will need to understand and perform. BerryDunn has also provided the OPPD with general RMS and field technology information in Supplemental Appendix D. The OPPD may wish to reference this information as it considers RMS and field technology solutions and options.	

Data, Technology, and Equipment		
No.	**e-Citations**	**Overall Priority**
Chapter 8, Section I: Data and Technology		
8-3	**Finding:** The OPPD has an electronic citation program called Brazos. This system produces electronic citations, but is not currently configured to transfer data into the OPPD RMS. A key purpose for having an electronic citation program is to improve efficiency and accuracy of data collection and entry. Although officers benefit from this program in the field, Records must still manually enter this data into RMS, which is inefficient, and also increases the opportunity for data entry errors. OPPD personnel told BerryDunn that Brazos was unable to transfer data to RMS, but that statement is inaccurate. Brazos cannot currently transfer the data, but the program is capable of doing so, given the proper software interface.	
	Recommendation: The OPPD should work with its vendor to develop an interface to automatically transfer citation data from Brazos into its RMS. BerryDunn recommends the OPPD explore development and implementation of such an interface.	

Data, Technology, and Equipment		
No.	**Impartial Policing and Other Data Collection**	**Overall Priority**
Chapter 8, Section I: Data and Technology		
8-4	**Finding:** The OPPD has two portals for entering impartial policing data: the racial profiling (impartial policing) portal, and the field contact portal. The two portals collect similar data, and there has been confusion among officers on which to portal to use when, and for what purpose.	
	Recommendation: The OPPD should merge the functions of the impartial policing portal and the field contact portal for all data that relates to impartial policing. All impartial policing data should be collected through this single portal, consistent with OPPD policy and the other recommendations of this study. The impartial policing portal was designed to meet state data collection requirements. Although this portal does perform that function, its usability could be improved. Staff expressed the desire for modifications to the layout of the portal, and suggested drop-down lists should be added and/or modified. The OPPD field contact portal was created to replace handwritten field contact cards previously used by the department. These field contact cards were often used for intelligence purposes, not a method of reporting or recording demographic or impartial policing data. Consequently, officers have been understandably confused about when to use this portal, and for what purpose. To correct these issues and to support consistent data collection going forward, BerryDunn recommends the OPPD create a single portal for collection of all impartial policing data, whether related to an officer-initiated stop, or a contact resulting from a CFS. The OPPD should meet with officers to discuss revisions and enhancements to the portal to make it more usable, and to help ensure that it fits their needs. The OPPD should create a separate portal for providing intelligence information to investigations. This portal should be used exclusively for this purpose, and in conformance with any and all intelligence data rules, procedures, and laws.	

Data, Technology, and Equipment		
No.	**Crime Analysis Unit**	**Overall Priority**
Chapter 8, Section III: Crime Analysis		
8-5	**Finding:** Crime analysts within the OPPD lack sufficient data systems knowledge or access to retrieve various data, including impartial policing data that are critical to monitoring and evaluating police operations and practices.	
	Recommendation: The OPPD should provide appropriate system access to crime analysts to access all relevant OPPD data. The OPPD should provide	

Data, Technology, and Equipment		
	appropriate training to crime analysts to access, retrieve, and evaluate operational and impartial policing data. The OPPD currently collects substantial data as part of its operations, including impartial policing data. During this project, BerryDunn learned that some of this data either could not be accessed by crime analysts, or it was unclear how to retrieve it. Due to the critical nature of this data, and the need to regularly evaluate it, there is a need to provide adequate access and training for OPPD crime analysts, so those staff can perform this function.	

Data, Technology, and Equipment		
No.	**Police Facility**	**Overall Priority**
Chapter 8, Section III: Department Equipment and Facility		
8-6	**Finding:** There are numerous challenges with the current police facility, and it does not contribute to efficient and effective operations. More importantly, several security risks in the facility are likely uncorrectable, which create various liability and safety concerns for the Village and staff.	
	Recommendation: The Village should take steps to pursue a new police facility to improve operational efficiencies, to help ensure compliance with industry best practices and standards, and to reduce security and risk issues that exist within the current facility.	

Chapter 9: Training and Education

Training and Education: includes a review of pre- and in-service department training, field training, and staff development.

I. General

The Training Unit coordinates all in-service training for the OPPD. This unit is staffed by a single officer, assigned as the training coordinator. The training coordinator is responsible for training performance review, scheduling, assuring certification compliance, and assuring compliance with local, state, and federal requirements. Work for this unit may also include reviewing the work and the training needs of any of the sub-units and developing training opportunities to respond to those needs.

The OPPD has access to several academies for officer training, including the College of DuPage, the State Police, Cook County, and Chicago. Officer candidates spend three months in the academy prior to their field training. Although there are several academies available, there is competition for the available slots, and the OPPD regularly reserves slots when candidates are selected for hiring.

The OPPD does not provide any of the curriculum at any of the academies, and each academy follows learning objectives and curriculum provided and approved by the state. If officers wanted to teach at the academy, they could do so, but they would do this independent of the OPPD. The department is generally satisfied with the training officer candidates receive, but notes some academies are more focused on practical street skills, which the OPPD prefers.

II. Initial Training

Following academy training, new officers for the OPPD are assigned to field training for a period of 12 weeks. The program includes four phases, engaging different FTOs at each phase of the process. FTOs generate a daily observation report (DOR) following each shift, which is used to document trainee progress. In addition to the FTO training, the OPPD includes a two-hour training on the history of Oak Park, which provides an important perspective for new officers. BerryDunn notes that this is a best-practice example of orienting officers to a new agency and community.

The FTO program in use by the OPPD includes a standardized model, common within the policing industry. As noted in Chapter 5, the OPPD does not require that new officers complete a problem-solving exercise during field training. Requiring new officers to engage in a community-based problem-solving project as a part of their field training will not only benefit the community, based on the outcome of their work, it will also solidify an understanding of the processes involved in these projects, including the community policing foundation. OPPD is fortunate to have the RBOs and NROs doing this work, and assigning new officers to partner with an RBO/NRO to conduct a problem-solving project would provide great context to the OPPD's community policing philosophy.

During this project, BerryDunn learned that the OPPD does not have a formal field supervisor training program (FST) for newly promoted personnel. Training is often cited as one of the greatest responsibilities of a law enforcement agency. Implementing an FST program at the OPPD will help new supervisors to act decisively in a broad spectrum of situations. Additionally, providing FST will help new supervisors realize greater effectiveness in acting consistently with discipline, completing performance evaluations, and understanding the greater mission of the organization. Ultimately, such a program will foster cooperation and unity throughout the organization while providing newly promoted personnel training commensurate with their duties.

III. Higher Education and Officer Development

During this assessment, BerryDunn asked staff about incentives for education. Staff explained that there are some pay incentives for higher education; however, staff also told BerryDunn that the OPPD does not have any specific partnerships with area educational institutions.

During this assessment, BerryDunn inquired about officer development within the OPPD. Staff told BerryDunn that there is no formal officer development program within the department. The OPPD does consider staff development as part of the appraisal process, and various supervisor schools are available to those in supervisory positions; however, there is no formal personnel development program at this time.

IV. Records, Required, and In-Service Training

Early in this process, several staff expressed that training has been lacking within the department. BerryDunn learned that the department has not conducted any in-person in-service training since the pandemic (although they recently started using their indoor firearms range for training).

During interviews, several staff indicated that the department has been lacking in training for an extended period. They have not done active shooter training, there is no physical training for use of force (only a legal and policy review), and although they receive online training, this is not facilitated, and they feel there is a need for additional training.

The OPPD provided BerryDunn with its annual training budget for the past five years, which shows a progressive pattern from $37,250 in 2017, to $168,000 in 2022.[129] BerryDunn asked the OPPD to provide data on training provided to staff, and based on that data, BerryDunn determined that officers assigned to patrol and investigations averaged 22 hours of training in 2021. From prior studies, BerryDunn finds that departments average 63 hours per year, and for investigations, the number is 72.[130]

[129] SDI Table 9.1
[130] SDI Table 9.2

The OPPD also provided BerryDunn with data on officer requests for training, including those that were declined. Data from the past three years is provided in Table 9.1. Although BerryDunn lacks specific details on the reasons for training request denials, cost, staffing, and COVID-19 were all mentioned by staff as limiters to training.

Table 9.1: Training Requests and Approvals

Training Requests	Approved	Denied	Cancelled
2021	108	23	7
2020	119	43	10
2019	203	65	8

Source: Agency Provided Data

The change in the OPPD's training budget from 2017 to 2022 is significant and represents a substantial financial commitment to training for the department. However, the average reported number of training hours for patrol and investigation (22) is minimal (comparatively), but this number is consistent with reports from OPPD staff.

BerryDunn observes that the training budget for the OPPD is substantial, and the budget should support department training needs. However, the OPPD does not have a training plan to maximize the use of the training budget, and there is no defined plan for specific training for operational roles or personnel development. Additionally, given the comparatively low reported number of training hours for the OPPD, BerryDunn suspects there is a gap in recording officer training hours, which may explain this variance. Given the importance of training for officers – from a variety of perspectives – the OPPD should develop a strategic training plan for the department.

Through interviews with numerous staff, BerryDunn confirmed several opportunities to improve training for the OPPD. BerryDunn observed minimal training in a number of high-risk areas, including impartial policing, use of force, firearms, and active shooter. BerryDunn conferred with the Illinois Law Enforcement Training and Standards Board (ILETSB) and learned that many best practices training standards for the industry have not been required in Illinois. Recognizing this, the ILETSB and the state have implemented new training standards (effective July 1, 2022). These new standards, which BerryDunn has included in Appendix D of this report, outline a number of new in-service training requirements that all Illinois police departments must meet.

Although the OPPD has generally complied with providing training that meets the requirements of the ILETSB in the past, regular training—beyond the requirements of the ILETSB—can reduce liability for the department and Village, improve officer safety, and help equip officers to provide high-quality public safety services to the community. BerryDunn recommends the OPPD provide additional training in several key areas, and that this training be included as part of its overall strategic training plan.

Summary

The State of Illinois requires that officer candidates complete academy training prior to becoming certified. The OPPD uses several different academies for certification of officer candidates and reports satisfaction with the training level of applicants upon their graduation.

Following graduation, officer candidates must complete a 12-week field training program. The program and structure in use by the OPPD is common within the industry and is reportedly producing good candidates. However, the field training program does not include a community-based problem-solving exercise, which the OPPD, its staff, and the community would benefit from.

Although there are a host of training opportunities for new supervisors, the OPPD does not have a formal training program for newly promoted personnel. The department and staff would benefit from the addition of a FST program for new sergeants.

The OPPD training coordinator is responsible for coordinating required in-service training for personnel. Many staff reported shortcomings in the OPPD's approach to providing in-service training for staff, and BerryDunn observed several opportunities for improving department training. Notably, the OPPD should work to provide regular training in several key areas (outlined in BerryDunn's recommendation) and develop a department-wide strategic training plan.

Recommendations

This section provides the three formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 9.2: Chapter 9 Recommendations

Training and Education		
No.	**Field Supervisor Training Program**	**Overall Priority**
Chapter 9 Section II: Initial Training		
9-1	**Finding Area:** The OPPD does not currently have a formal process for training newly promoted personnel. Transitioning from line-officer to line-supervisor requires major adjustments for most new supervisors. First-line supervisors play a critical role in the success of the organization, and their personal success is imperative. Many new supervisors do not have extensive leadership training when they are promoted, and they often lack clarity of their role.	
	Recommendation: The OPPD should develop an FST program for all new	

Training and Education		
No.	**Field Supervisor Training Program**	**Overall Priority**
	supervisors. Training is often cited as one of the greatest responsibilities of a law enforcement agency. Implementing an FST program at the OPPD will help new supervisors to act decisively in a broad spectrum of situations. Additionally, providing FST will help new supervisors realize greater effectiveness in acting consistently with discipline, completing performance evaluations, and understanding the greater mission of the organization. Ultimately, such a program will foster cooperation and unity throughout the organization while providing newly promoted personnel training commensurate with their duties. Elements of an FST might include the following: • Outlining supervisor expectations • Clarifying supervisory responsibilities regarding policies and other general oversight duties • Training on writing performance evaluations • Identifying accountability and disciplinary processes to help ensure consistency throughout the organization • Mentoring by a senior supervisor within the same division There are many benefits to providing FST, and BerryDunn recommends that the OPPD develop and implement this process.	

Training and Education		
No.	**Strategic Training Plan**	**Overall Priority**
Chapter 9, Section IV: Records, Required, and In-Service Training		
9-2	**Finding Area:** The OPPD does not have a plan that establishes a department-wide training strategy. Although the OPPD clearly values training for its staff, there is no specific plan that provides direction for the Training Unit regarding the numerous duties and responsibilities of that unit. There is also no policy that outlines required or preferred training for operational roles, and no policy that outlines minimum training expectations for supervisors. There is no policy that addresses officer development, and no identified process for staff development or improvement plans.	
	Recommendation: The OPPD should develop a broad training plan that establishes a department-wide training strategy, which also outlines the types of training that coincide with certain job duties, and decisions regarding approval of training for officers, and the OPPD should use these guidelines as a framework	

Training and Education		
No.	**Strategic Training Plan**	**Overall Priority**
	for its ongoing training needs. BerryDunn also notes here that supervisors should be having regular discussions with officers regarding their intended career path as part of their performance evaluation and on an ongoing basis. Approval for specific training courses for officers should also take these discussions into account. In addition to developing this plan, the Training Unit should be monitoring the progress of officers assigned within each of the identified areas, and when courses are available that are in alignment with the training needs for those positions, the Training Unit should be proactively encouraging officers to submit for that training. The OPPD should consider the following areas in developing a training policy, plan, and strategy: • Training records maintenance • Requests for training • Department types of training • Training program and development • Curriculum development • Instructor development • Annual training • Preferred in-service training • Specialized training required by designated unit or role	

Training and Education		
No.	**In-Service Training**	**Overall Priority**
Chapter 9, Section V: Records, Required, and In-Service Training		
9-3	**Finding:** The OPPD has not consistently trained its sworn personnel in several important and high-risk areas.	
	Recommendation: The OPPD should add specific training to its in-service training requirements to help ensure sworn personnel are regularly trained in important and high-risk areas. • **DEI/Impartial Policing**: The OPPD should provide annual training on DEI and impartial policing. This training should incorporate current strategies for engaging impartial policing and DEI efforts. It should also cover department policies and procedures, and specific efforts of the department to monitor and improve impartial policing.	

Training and Education		
	• **Use of Force**: In addition to any state mandates, the OPPD should provide and require annual hands-on training for sworn staff. The hands-on portion of this training should include a wide range of topics, including but not limited to: open hand techniques and strikes, use of department-approved force tools – including chemical agents, batons, Tasers, less-lethal munitions, handcuffing, and weapon retention. Annual use of force training should include scenario-based training, de-escalation training, and use of non-force options. • **Firearms**: In addition to any state mandates, the OPPD should have at least one annual required firearms training opportunity for sworn staff. Firearms training should minimally include decision and scenario-based shooting, low-light shooting, off-hand shooting, reloading under pressure, and weapon malfunction drills. Annual firearms training should also include all authorized firearms carried or available to officers. • **Active Shooter**: The OPPD should provide periodic but consistent training (at least every two years) on response to active shooter incidents. Ideally, this training should occur offsite in a plausible setting, to provide a realistic perspective for officers. This training should be consistent with and conform to any department policies or procedures on active shooter response. The above areas are not intended to be all-inclusive. They are offered as key training areas of focus for the OPPD, in additional to any other state- or department-mandated trainings. BerryDunn also recognizes that the ILETSB recently updated its annual training requirements for police officers and agencies. The OPPD should review these standards to ensure ILETSB compliance now and in the future.	

Chapter 10: Recruitment, Retention, and Promotion

Recruitment, Retention, and Promotion: includes a review of agency practices related to hiring, retention, and promotion of personnel.

As the law enforcement profession currently faces great challenges, one critical element is garnering and maintaining public trust, which includes, in part, staffing policing agencies with officers who are representative of the communities they serve. As the 21st Century Policing Task Force Report noted:

> To build a police force capable of dealing with the complexity of the 21st century, it is imperative that agencies place value on both educational achievements and socialization skills when making hiring decisions. Hiring officers who reflect the community they serve is also important not only to external relations but also to increasing understanding within the agency. Agencies should look for character traits that support fairness, compassion, and cultural sensitivity.[131]

The importance of attracting and hiring quality personnel is critical in today's law enforcement climate. Many police agencies contribute significant resources to their recruiting and hiring processes, and the OPPD is no different. This section outlines the processes in use by the OPPD, and BerryDunn offers insights and recommendations from some of the more recent studies done on this subject.

As a part of this study, BerryDunn asked staff at the OPPD to complete a recruiting survey designed to capture relevant data regarding recruiting, retention, selection, and hiring strategies. The survey, developed by the IACP, has been used to collect data from other agencies studied and from several agencies around the country that are demonstrating best practices in hiring. Throughout this section, BerryDunn references data from this survey, and in particular, how this data relates to the practices of the OPPD.

I. Personnel Experience and Diversity

Although the OPPD has experienced an increased rate of turnover in recent years, like much of the law enforcement industry, the OPPD continues to reflect a well-experienced staff.[132] This is true for the executive-level, mid-range supervisors, and patrol staff. Despite this positive observation, average experience levels at the OPPD could decline markedly, if attrition levels remain elevated.

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[131] Final Report of the President's Task Force on 21st Century Policing. Washington, DC: Office of Community Oriented Policing Services; Published 2015; page 52

[132] SDI Table 10.1

The high experience level of the command staff, while generally a positive thing, could present a challenge for the OPPD. Tenured leaders tend to have experiences that help guide executive decisions, and essentially all of the OPPD command staff (at the command level or above – including the police chief) have more than 20 years of experience, with several already near retirement age. For the OPPD, there is a need to vigorously pursue succession planning efforts, so that the department is prepared when command-level retirements occur. As will be discussed later in the report, attrition and staffing are significant issues to address, and making improvements in these areas will ultimately improve overall experience levels within the police department, and positively affect service to the community.

BerryDunn also reviewed the racial diversity within the OPPD, including an examination of diversity by rank.[133] The sworn staff at the OPPD are predominately White at 67.96%. Officers in the OPPD, who are persons of color, comprise 32.04% of the sworn staff (including the Hispanic/Latino population). The percentage of White vs. non-White officers is highly consistent with the Village population. Based on the data from Table 1.1, Oak Park's population is 66.07% White, 18.45% African American, with the remaining percentage of the population spread across multiple races. Oak Park's population also includes 9.48% who identify as Latino or Hispanic. The sworn Latino/Hispanic workforce for the OPPD is 12.62%, which exceeds the community demographic percentage.

A notable observation of the OPPD's diversity is the level of persons of color representation within the supervisory ranks at the police department. Of the 24 supervisory positions within the OPPD (including sergeants), 10 are persons of color. This represents a strong representation of diversity within the OPPD's supervisory positions.

BerryDunn has examined the diversity issue extensively, has aggregated data from several prior studies, and has compiled data from benchmark cities and national data.[134] BerryDunn notes that diversity levels within the OPPD exceed all comparison categories. More importantly, however, is that best practices suggest that police agencies should reflect the demographics of the community they serve. Staffing within the OPPD is consistent with community demographics and this is a best practice example for the OPPD.

It is common within the police industry for males to dominate the workforce. OPPD's workforce is 85.44% male.[135] BerryDunn observed that the ratio of males to females at the OPPD is more balanced than the prior studies and benchmark averages BerryDunn has experienced.[136] This means that the percentage of women within the OPPD is higher than many other departments, and again, this is a good example of diversity within the organization (though it is far from equal).

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[133] SDI Table 10.2
[134] SDI Table 10.3
[135] SDI Table 10.4
[136] SDI Table 10.5

It is important to add here that BerryDunn favors the hiring and promotion of quality candidates, regardless of gender, ethnicity, or other status. Traditionally, various groups of individuals have been underrepresented within the law enforcement industry, and there is significant evidence to show that improving organizational diversity benefits the department and the community. There is also evidence to suggest that when organizations focus their efforts on improving organizational diversity, they get results. Although the OPPD workforce represents diversity of both race and gender, the OPPD should continue to focus on these areas as priorities.

II. Hiring, Recruitment, and Retention

At the beginning of this project, staff explained to BerryDunn that hiring, recruiting, and retaining staff was an important issue, and one that staff hoped this study would examine and address. This section outlines BerryDunn's evaluation of this area.

As with many police agencies in the United States, the OPPD has experienced some challenges in recruiting and retaining personnel. To its credit, the OPPD has traditionally been a draw for many candidates wishing to pursue a law enforcement career. However, industry shifts, the national climate, and modes of identifying, connecting with, and attracting candidates—including the right candidates—have made hiring more difficult for the OPPD (and all of law enforcement).

Recruiting

OPPD Policy 2.27, dated 2007, outlines recruiting and the OPPD's commitment to being an equal opportunity employer. The policy identifies various administrative and perfunctory duties related to the hiring process, and describes the recruiting plan for the OPPD, which is included as an appendix within the policy. The recruitment plan, which is more of a statement of goals and objectives, is aged, and it does not include details or strategies for recruiting police officers in the current market.

In conversations with OPPD personnel, BerryDunn learned that the OPPD does not have anyone assigned to recruiting efforts, but instead relies on the Village HR director to perform this function on behalf of the OPPD. Staff told BerryDunn that the Village has targeted job fairs and universities as a mechanism for recruiting, but that the Village and OPPD do not conduct direct community outreach for recruiting candidates, and that most of the recruiting is done through passive means (ads, social media).

BerryDunn has observed, in multiple projects, that many police departments are clinging to an outdated recruiting model. Prior police recruiting was largely passive, and due to the volume of applicants, there was no need to adjust this practice. However, given current hiring conditions, there is a need to develop more active and intentional recruiting strategies. Although the OPPD policy describes the agency's recruiting plan, this information lacks active tasks and practices.

A good recruiting plan can establish priorities for the recruiting unit and efforts. It also helps everyone within the department understand the recruiting goals of the department. The recruitment plan should identify the areas where the department will advertise and recruit

candidates, including multiple traditional and web-based methods, and it should also outline the relationships between the OPPD and various educational and law enforcement training institutions.

The recruiting plan should describe the commitment of the department to establishing a workforce that seeks an ethnic, racial, and gender balance that is representative of the community it serves. Further, the plan should include specific steps and strategies that will be used to accomplish these goals. BerryDunn has compiled a list of considerations that the OPPD should evaluate as part of its process to develop a strong recruiting plan. BerryDunn has included this information in Section 1 of the OARM.

Retention

Like many law enforcement agencies, the OPPD has lost a significant number of officers in recent years for reasons other than retirement. Due to the cost of acquiring new staff, retaining officers should be a priority that involves an intentional plan and level of effort. In many organizations, retention is a passive process. Little thought is given to it, and when attrition occurs, most thoughts turn to how to fill the vacancy, instead of why it occurred in the first place. Retention starts with recognizing the initial investment placed in hiring staff, and it continues with intentional steps that demonstrate to staff that they are valued by the organization. Many retention efforts involve hard costs. However, it is important to recognize that the cost of attrition is nearly always substantially higher than the costs of retention incentives.

The OPPD should collaborate with the Village, HR, and internal staff to develop a strategic plan that identifies specific steps that target retention as an outcome. The OPPD should continually monitor all voluntary separations from the department, capture this information, and review and revise the retention plan annually based on observed successes or ongoing retention challenges.

III. Selection

In addition to reviewing the recruitment efforts of the OPPD, BerryDunn also examined the hiring process for the department. At BerryDunn's request, the OPPD outlined the hiring steps involved for police officers.[137] BerryDunn observes that the process in use by the OPPD is similar to many police agencies. Notably, the OPPD reports it takes approximately 18 weeks (more than four months) for an applicant to move from the application to the conditional offer for an officer position. BerryDunn has found that long hiring timelines can be a challenge, because candidates are often applying to multiple agencies, and oftentimes they are hired by another community more quickly. BerryDunn suggests the OPPD look for opportunities to streamline the hiring process, including using a rapid hiring program (as outlined in the OARM).

[137] SDI Table 10.6

Like many departments, the OPPD uses discretionary disqualifiers for police officer applicants. These disqualifiers are not mandated by state certification laws, but rather, have been identified by the OPPD as relevant factors in making a possible hiring decision. BerryDunn recognizes that each department and community might establish hiring standards and disqualifiers that are specific to its culture and setting. However, as these standards and disqualifiers are discretionary, not state mandates, good applicants might be unnecessarily eliminated from further consideration. In some cases, there may be value in exploring and reconsidering discretionary disqualifiers, particularly when significant time has passed, or other mitigating circumstances are involved. BerryDunn recommends that the OPPD consider a process where applicants who are disqualified due to a discretionary disqualifier have the opportunity to meet with a panel from the department to offer an explanation. This can be an opportunity for the department to reconsider its position and for the applicant to continue on in the process.

IV. Attrition

For many United States police departments, and for the OPPD (as noted), attrition presents an ongoing challenge in terms of maintaining adequate staffing. Based purely on statistics, the average separation rate for officers should be about 3.33%, assuming departments only lose people through retirement. However, as a practical matter, BerryDunn recognizes that the distribution of hiring is often not equal (sometimes people are hired in blocks – as opposed to a fixed amount on an annual basis); not everyone stays for 30 years in the profession (or in one place), and some areas are more conducive to lateral transfers among officers. Accordingly, in most agencies, annual retirements usually fall below the average calculation rate. Of course, BerryDunn also knows that some officers in the department will leave for other reasons, which invariably increases the overall separation rate.

Determining what is a high separation rate is difficult, as myriad factors could affect officers leaving. However, data can be compared from other sources to assess the level of attrition in different agencies. To provide for these comparisons, BerryDunn has provided Table 10.1. The top section of the table shows the attrition rates from several recent studies. These rates include all separations combined, including voluntary resignation, retirement, and discharge. The bottom portion of the table includes attrition data for the OPPD.

Table 10.1: Annual Separations and Comparison Data

Reason	Year 1	Year 2	Year 3	Year 4	Year 5	Average
Voluntary Resignation	2.36%	3.10%	3.72%	4.09%	3.95%	3.44%
Retirement	1.88%	2.19%	1.85%	2.16%	2.07%	2.03%
Discharged	0.91%	0.80%	0.74%	0.91%	0.91%	0.85%
Grand Total Percentages*	5.14%	6.08%	6.31%	7.16%	6.93%	6.32%

Oak Park PD	2017	2018	2019	2020	2021	Average
Voluntary Resignation	0.00%	0.00%	4.24%	0.85%	2.54%	2.54%
Retirement	0.00%	0.00%	5.93%	4.24%	2.54%	4.24%
Discharged	0.00%	0.00%	0.00%	0.85%	0.00%	0.28%
Grand Total Percentages*	**No Data**	**No Data**	**10.17%**	**5.93%**	**5.08%**	**7.06%**

Source: Police Department Provided Data
Separation rates shown as a percentage of the current sworn workforce. Totals reflect all sworn separations, including recruits. Discharged includes medical (death) and forced separations.
*Table includes data from prior studies.

The average percentage of separations for the OPPD is 7.06%, which is slightly elevated in comparison to the other data. It is important to note that many agencies are experiencing higher-than-usual attrition rates, and the OPPD rate is not alarming from a comparison standpoint.

Given the data and information provided in this section, it is important that the OPPD focus significant effort on hiring and retention, as attrition is very costly both operationally and fiscally. Using a conservative estimate of $50,000 for the hiring and training of one police officer, the Village has effectively lost $450,000 over the past three years due to voluntary resignations (nine voluntary separations from 2019 to 2021). Arguably, some attrition will always occur. However, if the OPPD could positively affect the attrition rate, this could represent a substantial savings to the Village. More importantly, it would help the Village and OPPD staff an appropriate amount of personnel to manage the public safety functions of the police department.

Of particular interest and relevance regarding attrition is developing an understanding of what is causing the voluntary separations, so that the OPPD and the Village can take steps to reduce these rates. BerryDunn made inquiries about exit interviews for departing police staff and was told that these are sometimes done, but there are questions about whether people are honest in their responses and reasons offered. BerryDunn suggests the Village and OPPD continue this process, as it can be particularly valuable to understand what conditions are prompting voluntary resignations. Ultimately any data derived from exit interviews should be shared with HR, executive staff at the Village, the OPPD, and the Council, to facilitate any necessary discussions that may provide remedies.

V. Promotion

Some within the OPPD have described the promotional process as inconsistent, suggesting that different processes have been used for different ranks and it is not always the same. This has caused stress among department personnel, because they do not know what to study or be prepared for in order to successfully compete for a promotion. Although the OPPD does have a policy for sergeant promotions (Policy 2.30), it is an old policy, and is likely in need of updating. The department should develop a current and comprehensive policy that describes the promotion process for all sworn and professional staff. Village HR can assist in developing a fair and equitable process for consistency.

This policy will help the agency to establish a professional development plan or a succession plan for the future growth of the department leadership. There will be some personnel who have no intention of promoting to a higher rank, but may want to enhance their knowledge in specialty assignments or other areas inside of law enforcement.

BerryDunn recommends the OPPD develop a policy that outlines the processes to be used for the promotional ranks for both sworn and professional staff within the department, and that these guidelines be included within the department policy manual and consistently followed.

VI. Staffing

Throughout this report, BerryDunn has made several observations regarding staffing, and specific hiring recommendations are summarized in Chapter 12. In addition to adding the recommended staff, it is also important for the OPPD to identify its optimal staffing level and to develop a new authorized hiring level that accounts for annual attrition to help ensure that optimal staffing levels are maintained. Staffing at this level supports the full range of departmental services and contributes to maximizing the outputs of each unit and subunit within the department. Once the minimum operational level has been established, the Village and the OPPD need to take steps to maintain staffing at that level. Due to attrition rates and the lag-time involved in hiring and staffing sworn positions, the authorized hiring level must be adjusted. The authorized hiring level should be sufficient to overcome projected attrition within the department.

The Village and the OPPD should discuss the data in Table 10.1 and estimate an annual attrition rate. Then, the Village and the OPPD should combine the personnel allocation number and the attrition rate, establish that number as the authorized hiring level for the upcoming year, and seek to hire to that number.

BerryDunn notes here that the main point of this recommendation is that once the optimal staffing level is reached, the OPPD and the Village should strive to maintain that level. Hiring in advance of the expected attrition level will help ensure this.

Summary

Like many organizations, the OPPD has experienced challenges in recruiting, hiring, and retaining personnel. Attrition is an important issue for the OPPD, and it is important the

department take steps to fill staff positions within the department, and to help ensure the department can meet public safety demands.

Although the OPPD has substantial experience within certain parts of its workforce, several command staff are at or nearing retirement, and the OPPD would benefit from developing personnel to fill those roles, which will, predictably, be vacated in upcoming years.

The OPPD has a workforce that is generally representative of the community. The OPPD is also doing better than most police department in its gender balance. Although the OPPD is doing well in these categories, it should continue to seek broad diversity, both from an ethnicity and gender perspective, within its ranks, including supervisory and command positions.

The process for hiring officers within the OPPD is similar to most law enforcement agencies, and it follows a natural progression. There are no major concerns with the current hiring process from a validity standpoint. However, timeliness and fail rates might be improved by making revisions to certain steps.

Although the OPPD hiring process generally appears to be meeting department needs, there is a need to improve the recruiting efforts of the department. To help ensure that recruiting is a more intentional process, and one that has clear goals and objectives, the OPPD should develop and establish a recruiting plan. The recruiting plan should include numerous perspectives and operational components, including analyzing mechanisms for developing retention strategies.

Examining attrition and retention issues within the OPPD should cover a broad range of work conditions and include a collaborative effort with Village officials to develop strategies to retain personnel.

BerryDunn reviewed the general process involved in department promotions and found that such processes have not been applied consistently over time. There is no indication that this has been intentional; however, having consistent promotional processes helps personnel understand the path to promotion, should they wish to pursue this, and it provides personnel with information critical to their development and eventual readiness for promotion. Accordingly, BerryDunn recommends the OPPD work with Village HR to develop a consistent policy and practice in this area.

The OPPD should establish an authorized hiring level, based on optimization of department activities, consistent with this report. The authorized hiring level should also include and account for annual attrition rates, and hiring should be authorized in advance of projected attrition to help ensure the OPPD can maintain optimal staffing levels. The OPPD and the Village should work collaboratively on an ongoing basis to monitor and adjust the hiring level to be consistent with attrition rates.

Recommendations

This section provides the three formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below

includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 10.2: Chapter 10 Recommendations

Recruitment, Retention, and Promotion		
No.	**Recruiting Plan**	**Overall Priority**
Chapter 10, Section II: Hiring, Recruitment, and Retention		
10-1	**Finding:** The OPPD does not have a formal recruiting plan that supports a specific and focused effort at recruiting. Recruiting is currently managed by Village staff, and there has been limited effort to significantly expand recruiting efforts beyond traditional approaches.	
	Recommendation: The OPPD should develop a strategic recruiting plan that explores all possible options for improving the recruiting and hiring of officers. The plan should outline the goals and objectives of the OPPD in building and maintaining a diverse and quality workforce that represents the department's core values. BerryDunn recommends that the OPPD establish a strategic recruiting and hiring plan, and that the department review this report and the relevant suggestions in the OARM to help inform plan development.	

Recruitment, Retention, and Promotion		
No.	**Retention Strategy**	**Overall Priority**
Chapter 10, Section II: Hiring, Recruitment, and Retention		
10-2	**Finding:** The OPPD does not have a strategic approach to retaining staff, and in particular, sworn staff.	
	Recommendation: The OPPD should develop a retention plan that includes specific steps intended to create an atmosphere that recognizes the long-term value of officers and other staff. BerryDunn has compiled a list of considerations that the OPPD should evaluate as part of its process to develop a strong retention plan. BerryDunn has included this information in Section 1 of the OARM.	

Recruitment, Retention, and Promotion		
No.	**Operational Minimums and Authorized Hiring Levels**	**Overall Priority**
Chapter 10, Section VI: Staffing		
10-3	**Finding:** Authorized hiring levels at the OPPD do not account for attrition rates. Hiring for officers at the OPPD occurs when there are vacancies, and despite a recent increase in attrition, annual voluntary separations are generally predictable and consistent. Because of the lag-time associated with hiring and providing initial training for officers, the OPPD is constantly working without its full complement of personnel.	
	Recommendation: To maintain optimal staffing levels, hiring should always occur at the rate of allocated personnel plus the anticipated attrition rate. In collaboration with Village leaders, the OPPD should establish a minimum operational level and a new authorized hiring level (consistent with the findings of this report) that helps ensure continuity of staffing.	

Chapter 11: Professional Standards/Internal Affairs (IA)

Internal Affairs: includes a review of the internal affairs process, including case routing, review, dispositions, and dissemination of investigation results.

The purpose of the OPPD Professional Standards (IA) Unit is to help ensure ethical conduct in the organization while providing an environment of mutual trust and respect with the community. IA falls under the direct authority of the chief of police; however, from a functional standpoint, IA is a decentralized function and IA investigations are conducted through the commander of the involved officer(s). BerryDunn outlines this process further in the next section.

Early in this project, BerryDunn identified an IA area that required prompt attention, and outlined that observation as part of the Emergent Issues Memo. BerryDunn learned that minor complaints (e.g., rudeness, driving behavior) are sometimes managed at the supervisor level, without the generation of a formal complaint document, or other informal documentation. This is not uncommon in police agencies, and in many cases a citizen may prefer an informal resolution (having someone talk to the officer), as opposed to filing a complaint, which might result in the officer getting in trouble. Again, not uncommonly, within the OPPD, some of these incidents have been documented in various informal manners, while others have not been documented at all.

To resolve this gap, the OPPD should provide clear policy on how minor complaints resolved by supervisors are documented. Policy should direct that all complaints received related to employee misconduct, whether resolved at the supervisor level or investigated as informal or formal complaints, should be consistently documented and stored in a central repository. All complaints, regardless of their categorization, should contain basic complaint and complainant information, and a summary of the supervisor's actions relative to the complaint.

Due to the importance of this subject area, BerryDunn also wishes to provide some additional context. BerryDunn found no evidence or indication that those wishing to file a complaint have been dissuaded from doing so, nor were there any indications that supervisors, either individually or collectively, were failing to document informal performance matters for improper purposes. Instead, all supervisors that BerryDunn met with appeared to take their role in the accountability process seriously, and all seemed willing to follow any expectations for them in that regard.

I. Complaint Process and Routing

As noted in Chapter 7, the OPPD has policies related to IA, and as outlined in that chapter, BerryDunn is recommending some revisions. OPPD Policy 2.06 Complaint/Disciplinary Process outlines various aspects of the IA function. One of the processes outlined in Policy 2.06 involves routing of IA complaints. Based on interviews with staff, IA complaints are routed in the following manner:

1. The complaint is received and documented in a binder in the commander's office
2. Command staff, including division commanders, deputy chiefs, and the chief, are alerted about the complaint
3. The complaint is documented on an Excel spreadsheet for tracking (the department does not use, but is looking into acquiring IA tracking software)
4. The complaint is assigned to the commander who supervises the involved officer(s)
5. If the case involves an officer/non-sworn staff member, it can be delegated to a sergeant, or the non-sworn staff member's supervisor; otherwise, the commander will investigate it
6. The investigator produces a report with findings; if a sergeant completes the investigation, then the commander will conduct a command review
7. The commander provides recommendations and submits the investigation through the chain of command
8. The deputy chiefs will review and either send it back for more investigation, concur with the findings and recommendations, and/or modify or append the recommendations
9. The chief directs the case to be closed along with final findings and appropriate discipline, if necessary
10. All completed community-initiated cases are then presented to the CPOC (this excludes internal complaints)[138]

This process includes several layers and numerous command personnel. Including multiple individuals in the process can help ensure that the findings and results are fair and objective, and that recommendations on discipline (if any) are consistent and aligned with the severity of the violation. One challenge BerryDunn observed, however, involves who conducts the investigation. Although delegation of duties to the right personnel level – those who can complete them most efficiently and cost-effectively – is a leadership best practice, BerryDunn learned that many supervisory personnel within the OPPD who might be asked to conduct an IA investigation do not have IA training.

IA cases can result in civil or criminal liabilities, or both, and the rules and guidelines for conducting those investigations can be critical in whether the finding or outcome is actionable and sustainable. Countless civil and criminal cases have been dismissed due to procedural errors that could have been avoided with proper training and a clear understanding of how to conduct an IA investigation. Accordingly, BerryDunn recommends that only trained personnel

[138] SDI Table 11.1

should conduct IA investigations. Additionally, because of the critical nature of understanding the role of victims in the complaint process, training for those who conduct IA investigations should also include victim trauma training.

II. Dispositions

OPPD Policy 2.06 also outlines various possible dispositions of IA investigations, including:

- Unfounded – allegation is false or not factual
- Exonerated – incident occurred but was lawful and proper
- Not Sustained – insufficient evidence either to prove or disprove the allegation
- Sustained – allegation is supported by sufficient evidence to justify disciplinary action

These dispositions are typical of IA policies and help clarify complaint dispositions. BerryDunn asked the OPPD to provide a list of complaints, dispositions, and origins for the past five years. The OPPD provided BerryDunn with data for all complaints, both internal and external, along with the dispositions. Over the past five years (2017 to 2021) the OPPD averaged 13 community-complaints per year. During that same period, the OPPD averaged 23 internal/administrative complaints per year.[139]

BerryDunn observes that of the 179 total complaints (internal and external) filed with the OPPD over the past five years, there were 219 sustained counts (a count is an allegation within a complaint), 37 not-sustained counts, and 36 were unfounded (note that some complaints include multiple counts). The high percentage of sustained complaints suggests a desire for staff accountability. This is commendable, but understandable, given that most of the internal complaints were performance-driven, and most of the sustained complaints relate to internal complaints. Still, the data suggests attention to performance and that the department will hold officers accountable.

The average of only 13 external complaints over five years for a police agency of over 100 officers could easily be viewed as positive and remarkable. However, given the volume managed by the OPPD, it is likely that the number of IA cases is not wholly representative of the volume of complaints received by the department. In policy and practice, there are opportunities for supervisors to manage complaints, and many of these, though appropriately managed, are not represented in the dataset BerryDunn reviewed. As BerryDunn has already recommended in this chapter, reporting practices should be adjusted to more accurately identify all complaints and dispositions.

In discussions with staff, BerryDunn learned that the OPPD does not regularly publish any data regarding IA complaints and dispositions. Although there are various laws that govern what

[139] SDI Table 11.2

information can be made public, it is commonplace and best practice to release the nature, number, and origins of complaints, as well as the dispositions. This is an important element of building and sustaining trust with the community.

III. Oversight

One of the areas BerryDunn considers when assessing complaint processes within police agencies is the type and level of oversight involved. The routing of IA complaints for the OPPD involves several steps and multiple layers of internal review by supervisors. This type of process, though perhaps time consuming, is commendable, as it helps ensure that multiple perspectives have been considered and that the final disposition is consistent with policy, departmental philosophies, and legal standards.

The level of review for cases that do not reach the IA level is lacking in structure, policy, and, likely, consistency. Moreover, without examining each complaint, there is no way to determine whether cases that were disposed of at the supervisor level should have been moved to the IA process. Accordingly, BerryDunn has recommended that the OPPD implement a policy of IA review, documentation, and categorization of all complaints. This will help ensure appropriate documentation, but it will add to the consistency of cases routed to supervisors for informal disposition.

As reported in Chapter 5, the OPPD has a long-standing review board in the CPOC. This board reviews all community-generated IA complaints that result in an investigation. BerryDunn reiterates that the OPPD should reconsider the purpose of the CPOC and consider expanding its role.

IV. Policy and Discipline

The OPPD policy manual includes two significant sections which address internal affairs, complaints, and the administrative investigation process: Section 1.31 (Supervisor, Internal Affairs) is a job description which details many of the operational functions related to these topics. Section 2.06 (Complaint/Disciplinary Process) details the complaint and administrative investigation process.

Complaint Categorization and Investigation

One observation BerryDunn made, which was described in Chapter 7, concerns the definition of a formal investigation (see Policy 2.06 III Definition). The definition indicates that a formal investigation is defined as “misconduct which may be the basis for filing charges seeking his or her removal [the officer], discharge or suspension in excess of three days.” Policy 2.06 does not define an informal investigation, nor does it identify the reporting and routing expectations. There needs to be a clear understanding of what complaints can be handled at the various levels of supervision and which complaints rise to the level of an IA investigation. Complaints filed against department personnel which do not rise to the level of an IA investigation should still be investigated, and appropriately documented. More importantly, the policy should be clear, and outline all appropriate steps for all investigation types.

Use of Force and High-Profile Incidents

Use of force incidents which involve the use or attempted use of deadly force by a police officer, and other high-profile or serious complaints, should ideally be investigated by an outside agency. OPPD Policy 4.66 Officer-Involved Shooting Procedures outlines the processes to be used in the event of any officer-involved shooting. This policy appropriately outlines the duties and responsibilities of the supervisor at the scene, and the criteria for activation of the Illinois State Police Public Integrity Task Force (Task Force). The following excerpt relates to the role of the Task Force:

> The sole purpose of the Illinois State Public Integrity Task Force investigation, as it relates to an officer involved shooting, is to ascertain if the officer(s), when discharging their weapon(s) or using any other form of deadly force, violated any criminal statutes. The Public Integrity Task Force does not investigate possible violations of policy or procedures of the Oak Park Police Department, nor does it investigate possible charges to file against an offender involved in an officer-involved shooting.

BerryDunn recognizes the value of the inclusion of the Task Force in officer-involved shootings. However, the policy clearly states that the Task Force is not expected to investigate possible violations of policy or procedure. The use of an external entity to conduct an investigation into an officer-involved shooting is a best practice within the industry. However, the scope and role of the Task Force is limited and does not provide a fully independent investigation of the event. Given this limitation, BerryDunn recommends the OPPD develop a policy for the external investigation of all serious force uses, including those involving great bodily harm or death.

Summary

The OPPD has a robust system of professional accountability, which is managed by the IA Unit. This unit is responsible for all serious complaints against officers, and it follows a set of policies in carrying out its function. BerryDunn has made numerous observations and recommendations about the IA policy in Chapter 7 and in this chapter.

Data regarding IA complaints over the past five years demonstrate a department that is ethical and committed to holding staff accountable, whether that accountability originates externally or internally. However, it is likely that due to reporting practices, IA data is incomplete in presenting a full accounting of issues and complaints raised, whether external or otherwise. This practice can be easily remedied, and BerryDunn has provided details recommending this.

In addition to a more complete capture of all complaint data, BerryDunn is recommending the OPPD publish summary data to the public on the number and nature of complaints, as well as the dispositions. The purpose for this is to improve transparency, and to build and sustain community trust in the IA/Professional Standards process.

BerryDunn also observed that the current IA policy does not include provisions for external investigation of officer-involved shootings or other high-profile and critical IA complaints.

Although current policy includes the use of the Task Force, the OPPD should adjust its policy to include independent investigation of all serious force uses.

Again, as noted within this chapter, BerryDunn is aware the OPPD has been working on a revised IA policy, although BerryDunn has not reviewed this document. BerryDunn does recommend the OPPD review and incorporate any appropriate recommendations from this report into the new policy prior to implementation.

Recommendations

This section provides the two formal recommendations from this chapter, presented chronologically as they appear within the chapter. Each recommendation in the table below includes the chapter section, recommendation number and priority as assessed by BerryDunn, and details concerning the findings and recommendations.

Table 11.1: Chapter 11 Recommendations

Professional Standards/Internal Affairs		
No.	**Complaint Intake**	**Overall Priority**
Chapter 11, Section I: Complaint Process and Routing		
11-1	**Finding:** The OPPD has policies that outline the Internal Affairs/Professional Standards complaint process and the associated investigations. These policies do not provide guidance on resolution of complaints occurring at the supervisor level that are not routed for informal or formal investigation, nor do they specify appropriate documentation practices for these instances.	
	Recommendation: The OPPD should provide clear policy on how minor complaints resolved by supervisors are documented. Policy should direct that all complaints received related to employee misconduct, whether resolved at the supervisor level or investigated as informal or formal complaints, should be consistently documented and stored in a central repository. All complaints, regardless of their categorization, should contain basic complaint and complainant information, and a summary of the supervisor's actions relative to the complaint.	

Professional Standards/Internal Affairs		
No.	**IA Investigations**	**Overall Priority**
***Chapter 11 Section I.* Complaint Process and Routing**		
11-2	**Finding:** The OPPD generally assigns high-profile and serious personnel complaints to designated personnel who have received specialized training on conducting IA investigations. In other cases, supervisors within the OPPD who lack training in IA investigations have been assigned to conduct IA complaints that	

Professional Standards/Internal Affairs		
	could result in discipline to the staff member under investigation.	
	Recommendation: Due to the specific laws, rules, and protocols associated with IA investigations, the OPPD should develop a policy and practice that only staff with appropriate training in IA investigations will be allowed to conduct IA investigations.	

Chapter 12: Conclusions and Recommendations

I. Overall Summary

BerryDunn's analysis of the OPPD suggests that leaders are consciously engaged in running the department in a progressive and positive manner, and that those within the organization, from command to line staff, take great pride in providing service to the public. Irrespective of the recommendations provided, BerryDunn found the OPPD to be a full-service, community-oriented police agency that has worked hard to respond to increasing service demands, despite ongoing staffing challenges.

In addition to the positive aspects of the work environment observed at the OPPD, there are opportunities for improvement, as the recommendations in this report suggest. Notable categories of recommendations involve:

- Staffing (including recruiting, hiring, and retention)
- Personnel development
- Policies and procedures
- Impartial policing and transparency
- Technology utilization
- Training

Staffing includes the hiring and retention of personnel, the use of non-sworn personnel, and the efficient scheduling and deployment of personnel (particularly sworn staff). There is also the need to improve the use of technology, both as an internal strategy for use of resources and developing operational efficiency, and as a mechanism for engaging alternative methods of incident reporting to mitigate growing staffing needs and service demands. Maintaining appropriate staffing levels has been a challenge for the OPPD. Although the OPPD has hired numerous officers in the past five years, various factors have recently contributed to increased attrition.

Another important staffing aspect for the OPPD involves establishing a new *operational minimum* level of sworn staffing for the department. The optimal staffing level for the OPPD, as determined through this study, is 119, and the new a*uthorized hiring level* for the OPPD should be 125. Hiring at 125 sworn positions will compensate for consistent attrition. These levels will help ensure that optimal operational minimums are maintained, which will lead to the more efficient and consistent delivery of police services for the community. At the same time, there is a need to staff various non-sworn positions, which includes reallocating personnel and adjusting some other duties and responsibilities. These efforts are intended to create operational efficiency and to most effectively utilize the resources allocated to the police department.

In addition to adding staff, there is a pressing need for the OPPD to engage in staff development. Several top administrators will retire in the next three to five years, and the OPPD will need to backfill those positions. To help ensure that qualified personnel exist for each rank level as vacancies occur, the OPPD must engage an intentional and formal personnel development program.

Throughout this report and primarily in Chapters 5 and 7, BerryDunn has identified various policy areas for the OPPD that require addition or revision. Revising or adding policies is a critical task for the OPPD, and given the national focus on policing, now more than ever, it is vital that the OPPD include others in this process. BerryDunn recommends that the OPPD engage internal and external feedback as it seeks to make policy additions or changes.

Various data BerryDunn reviewed focused on race, equity, transparency, and community trust. BerryDunn has provided several policy recommendations, as well as other operational recommendations, which the OPPD should pursue to address concerns surrounding these focus areas. Importantly, following implementation of the proposed solutions, the OPPD should monitor the various datapoints to assess success.

In addition to the need for personnel, BerryDunn noted several limitations for the OPPD relating to the use of technology. BerryDunn has observed that much of these limitations are due to configuration issues with the RMS and other peripheral software and hardware applications. The OPPD can realize significant improvements in overall efficiency through the use of technology, and, as with the recommendations in this report related to staffing, BerryDunn strongly recommends working quickly toward these solutions.

As indicated in the beginning of this report, it was necessary for BerryDunn to *freeze* certain conditions in order to conduct this assessment. However, this does not mean that the OPPD has been constrained from making various changes during this process. In fact, BerryDunn worked with the OPPD during the course of this project to inform key leaders on areas requiring more immediate attention. OPPD staff have responded positively in this regard, operating in a process of continuous improvement during the time of this study. Accordingly, some of the recommendations made by BerryDunn have already been acted upon by the OPPD, and some others are in queue. At BerryDunn's request, OPPD staff have provided a list of these efforts as they relate to the assessment recommendations, and these are outlined in SDIR Appendix B.

It is BerryDunn's sincere hope that this report and the associated recommendations serve to provide positive guidance, and that this report is viewed as a valuable resource, not only for the OPPD, but also for the government officials for the Village of Oak Park, who work together on behalf of the public to provide policing excellence for the community.

II. Staffing Summary

The following provides summary information regarding BerryDunn's staffing recommendations.

Community Service Officers (CSO)

BerryDunn is recommending the OPPD add non-sworn field personnel (CSOs) to respond to low-level police CFS, consistent with the findings of the Alternative CFS Evaluation report. BerryDunn recommends staffing two positions per day (day- and mid-shift). This will require the addition of four personnel to consistently staff these positions.

Additionally, BerryDunn recommends the OPPD staff two positions per day (day- and mid-shift) for a telephone response unit (TRU). Like the field-response positions, staffing two TRU shifts per day will require four personnel to provide consistent staffing.

BerryDunn recognizes that the OPPD already has six CSOs, who staff the walk-up window at the police department. These CSOs also monitor the temporary holding facilities at the police department and manage other minor work responsibilities. It is likely that these personnel could manage TRU responsibilities as well, at least initially. If the TRU volume becomes onerous, the OPPD might need to add personnel to manage TRU responsibilities.

BerryDunn's recommendation is to add four CSOs initially, for the purpose of managing low-level field response CFS. BerryDunn is also recommending the OPPD assign TRU responsibilities to the current CSOs staffing the desk, and the OPPD should provide for monitoring TRU workloads to determine whether additional personnel will be needed to staff one or both shifts BerryDunn has recommended.

Other Personnel

The OPPD should add an administrative supervisor to the Administrative Section to support operations. This supervisor should oversee the body worn camera (BWC) program, and the other units within the Administrative Section, other than Records.

Based on the overall assessment of the OPPD, BerryDunn recommends a minimum operational level of 119 officers; this will require an authorized hiring at a rate of 125 to maintain minimum staffing for the agency. The numbers here reflect the following:

- Current Authorized Sworn Staffing: 118
- Additional Sworn Staffing: 1
- Minimum Operational Level: 119
- Estimated Attrition Rate: 6
- Authorized Hiring Level: 125

These numbers assume an attrition rate that is consistent with historical and typical industry rates, not recent unusual attrition rates the OPPD has experienced. As the OPPD approaches the suggested operational level, it will be important to monitor attrition rates and to adjust the

authorized hiring level to match operational needs and to help ensure the minimum operational level of 125 officers is consistently maintained.

The proposed staffing changes and personnel deployment adjustments outlined in this report should result in optimized operations for the OPPD. Still, it is up to the OPPD and the Village, including government officials, to make these determinations and to set staffing priorities. Accordingly, it is possible that after further discussion, the Village and the OPPD might suggest modifications to what BerryDunn has proposed. As noted early in this report, BerryDunn feels strongly that final decisions of this nature should be made at the local level, in consideration of the recommendations provided, and BerryDunn encourages the OPPD and the Village to discuss these decisions together.

BerryDunn once again thanks the OPPD for its partnership and participation in this operational assessment. It is BerryDunn's sincere hope that this report and the associated recommendations serve to provide positive guidance to the Village and police department in advancing the delivery of public safety services for the community.

Appendix A: Acronyms

Appendix Table A.1: Acronyms

Acronym	Description
ABLE	Active Bystandership for Law Enforcement
ACS	American Community Survey
AVL	Automatic Vehicle Location
BJS	Bureau of Justice Statistics
BWC	Body Worn Camera
CAD	Computer Aided Dispatch
CALEA	Commission on Accreditation for Law Enforcement Agencies
CCPP	Community Co-Production Policing
COP	Community-Oriented Policing
CPOC	Citizen Police Oversight Committee
CSO	Community Service Officer
DEI	Diversity, Equity, and Inclusion
DOR	Daily Observation Report
DUI	Driving Under the Influence
DV	Domestic Violence
EMS	Emergency Medical Services
EPIC	Ethical Policing is Courageous
FBI	Federal Bureau of Investigation
FIP	Fair and Impartial Policing
FIP	Fair and Impartial Policing
FLSA	Fair Labor Standards Act
FMLA	Family Medical Leave Act
FOIA	Freedom of Information Act
FST	Field Supervisor Training
FTE	Full-Time Equivalent
FTO	Field Training Officer
FTT	Freedom to Thrive
FY	Fiscal Year

Acronym	Description
IACP	International Association of Chiefs of Police
IA	Internal Affairs
ICAT	Integrated Communications, Assessment and Tactics
IGA	Intergovernmental Agreements
ILCPA	Illinois Chiefs of Police Association
IPD	Impartial Policing Data
IT	Information Technology
KPA	Key Performance Area
LAP	Lethality Assessment Program
LGBTQ	Lesbian, Gay, Bi-sexual, Transgender, and Queer
MCT	Mobile Computer Terminal
MOU	Memorandum of Understanding
NAACP	National Association for the Advancement of Colored People
NACOLE	National Association for Civilian Oversight for Law Enforcement
NIBRS	National Incident-Based Reporting System
NIJ	National Institute of Justice
NRO	Neighborhood Relations Officer
OARM	Operational Assessment Reference Material report
OPPD	Oak Park Police Department
PERF	Police Executive Research Forum's
PIO	Public Information Officer
POP	Problem-Oriented Policing
PSA	Public Service Announcement
PSAP	Public Safety Answering Point
RBO	Resident Beat Officer
RMS	Records Management System
SDI	Supplemental Data and Information report
TRU	Telephone Reporting Unit
UCR	Uniform Crime Reports
Village	Village of Oak Park
WSCDC	West Suburban Consolidated Dispatch Center

Acronym	Description
ZCTA	Zip Code Tabulation Area

Appendix B: Essential CFS Report

Village of Oak Park, IL

Essential Calls for Service Evaluation – Final Report

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Table of Contents

Table i: Project Work Plan Updates

Version	Date	Update Reason
1	05/18/2022	Initial Version
2	07/05/2022	Sections 4-7 renumbered. Alternative CFS research added to the report in Section 4.0.

1.0 Introduction

Many police agencies in the U.S. have been struggling with increasing call for service (CFS) workloads, while simultaneously facing ever-tightening budgets and unprecedented attrition and vacancy rates. As a result of these challenges and national trends calling for police response reform, many communities and police departments have started to consider revisions to the traditional police CFS response model.

Considering alternatives to police CFS response is not new; in fact, many agencies already use some form of CFS diversion, whether through a telephone response unit (TRU), online reporting, mobile apps, or the use of non-sworn personnel. What is different and new in the most recent discussion of CFS response alternatives is an understanding that this conversation is not simply about providing these alternatives as possible options—it is about considering fundamental changes to how police departments do business, including identifying collaboration opportunities with other organizations, and in some cases outsourcing certain CFS types entirely.

Despite growing interest among police agencies in identifying alternatives to the traditional police CFS model, many have struggled to engage in an objective process that can produce appropriate and acceptable results. In some cases, suggested revisions have been met with resistance from staff, elected officials, and community members.

To help objectively evaluate alternatives to the traditional police response model (and other operational areas), the Village of Oak Park (Village) issued a request for proposals (RFP) for an operational assessment of the Oak Park Police Department (OPPD) in October 2020. BerryDunn was selected to conduct that work.

The best-practice approach to evaluating alternatives to the traditional police CFS model should expand the level of collaboration beyond the walls of the police department. The 21st Century Policing Task Force final report explains:

> Law enforcement agencies should work with community residents to identify problems and collaborate on implementing solutions that produce meaningful results for the community…and; Do things with residents in the co-production of public safety rather than doing things to or for them. [140]

Making changes to the traditional police CFS response model is an involved process that requires a thoughtful approach. BerryDunn has developed a collaborative Essential CFS Evaluation process that considers numerous critical factors, to produce data that police staff, community members, and elected leaders can rely upon in making critical decisions about

[140] Final Report of The President's Task Force on 21st Century Policing – http://www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf

future public safety needs. This report outlines BerryDunn's approach to this process, and presents the findings of the evaluation conducted for the Village and the OPPD.

2.0 Essential CFS Evaluation Process

BerryDunn's Essential CFS Evaluation model is outlined below. BerryDunn followed this process in conducting this evaluation. The results of the process are provided in Section 3.

2.1 Essential CFS Evaluation Work Plan Steps

BerryDunn followed the Essential CFS Evaluation work plan steps listed below:

1. Facilitate initial discussions with OPPD and project team
2. Finalize and distribute Essential Police CFS Evaluation tool internally
3. Distribute Essential Police CFS Evaluation tool externally
4. Conduct community feedback sessions
5. Staff and stakeholder interviews
6. Data analysis
7. Develop Preliminary CFS Evaluation Report
8. Discuss CFS Evaluation and response

2.2 Essential CFS Evaluation Discussion

Determining possible alternatives to traditional CFS police response requires substantial data collection and analysis to inform and guide outcomes and recommendations. The work plan above briefly outlines BerryDunn's collaborative approach to collecting and analyzing this type of data.

One aspect of BerryDunn's process involves analyzing the computer-aided dispatch (CAD) data for the police department. This determines CFS types to be evaluated, and also quantifies the level of annual work effort in full-time equivalent (FTE) sworn officer positions. For purposes of this analysis, calculating the value of a single FTE for patrol officers involves starting with the standard number of annual work hours (2,080), removing non-work time (e.g., vacation, sick leave, training), and calculating 30% of that value (which is the percent of time an officer is expected to be engaged in CFS activity), which for the OPPD is approximately 525 hours (30% of 1750 total working hours). Quantifying the data in this way helps determine the potential impact various CFS alternative responses could have on agency workload. If the FTE level is negligible, this data reveals that diverting a CFS category will likely provide little workload relief and add little value to the department and the community (although there may still be other reasons to divert some CFS types).

In addition to CAD data analysis, BerryDunn also uses a customizable CFS Evaluation instrument to collect quantitative data. This instrument is used to solicit data from members of the police department and various professional stakeholders, possible CFS response resources, and the community. Tables 2.1 and 2.2 reflect the numerous evaluative points of the instrument,

which present a full range of areas to be considered in making decisions about future police response.

Table 2.1: Essential Police CFS Evaluation Method

CFS Activity	Police Mandate	Risk/Potential Danger	Immediate Response	Type: Crime, Traffic, Service	Other Resources Available	Alternative Response	Volume in FTEs	Community Value	Custom Field
Alarm									
Theft									
Domestic									
Medical									
Mental Health									
Traffic									

Table 2.2: Essential Police CFS Evaluation Legend

Category	Rating	Explanation
Police Mandate	Yes, No	Legal requirement for response
Risk/Potential Danger	High, Possible, Limited	As assessed by call type and category
Immediate Response	Yes, No	24/7 response necessary/expected
Type: Crime, Traffic, Service	Category	CFS category assigned
Other Resources Available	Yes, No, Limited, TBD	Current, to some extent, or possible
Alternative Response	Yes, No	TRU or online reporting options
Volume in FTEs	Calculated Value	Based on CAD analysis
Community Value	Calculated Value	Based on community input (1-5)
Custom Field	TBD	TBD

Lastly, BerryDunn's process includes individual and group interviews with members of the department, stakeholders, service providers, and the community. This feedback is used to validate and support outputs from the quantitative data, and to guide and shape final recommendations. As part of this project, BerryDunn held several meetings with the Village

community and relevant stakeholders. The information and feedback collected during those meetings is provided in this report.

3.0 Essential CFS Evaluation Results

This section describes the results of the quantitative and qualitative data collection and its analysis.

3.1 Quantitative Data Collection

The initial CAD dataset BerryDunn reviewed contained 233 CFS types. BerryDunn placed these CFS types into a Microsoft Excel spreadsheet for evaluation by department staff. At BerryDunn's request, the OPPD assigned several patrol officers, line-level patrol supervisors, and other sworn officers to complete the evaluation form. A total of 31 sworn staff completed the assessment using the evaluation legend provided (see Table 3.1 below).

Table 3.1: Survey Legend

Category	Rating	Explanation
Police Mandate	Yes, No (Y - N)	Legal requirement for response (or reporting)
Risk/Potential Danger	High, Possible, Limited (H - P - L)	As assessed by call type and category
Immediate Response	Yes, No (Y - N)	24/7 response necessary/expected
Type: Crime, Ordinance, Traffic, Service	Category (C - O - T - S)	CFS category assigned
Other Resources Available	Yes, No, Limited, TBD (Y - N - L - T)	Current (Y or N), Limited (to some extent), or TBD (possible)
Alternative Response	Yes, No (Y - N)	Telephone Response Unit (TRU) or online reporting options
Volume in FTEs	Calculated Value (CAD DATA)	Based on CAD analysis
Importance Rating 1 – 10 (10 = Most Important; 1 = Least Important)		
Police Department Value	Calculate Value (Internal)	Based on department input (1 – 10)
Acceptance Rating 1 – 5 (5 = Most Accepting; 1 = Least Accepting)		
Community/Stakeholder Value: Open to Alternative Response (Phone/Online)	Calculated Value (External)	Based on stakeholder input (1 – 5)

3.1.1 Data Coding Protocols

After the assigned sworn officers completed their ratings and submitted them, BerryDunn merged the responses for data analysis and reporting, using the data coding protocols detailed below.

- **Police Mandate**: If any responses contained a Yes (Y), that category was coded with a Y. Otherwise, a No (N) was coded.
- **Risk/Potential Danger**: Coded with the most frequent risk label (H-High, P-Possible, or L-Limited).
- **Immediate Response**: If any responses contained a Y, that category was coded with a Y. Otherwise, an N was coded.
- **Crime, Ordinance, Traffic, Service**: Coded with the most frequent label (C-Crime, O-Ordinance, T-Traffic, or S-Service).
- **Other Resources Available**: If any responses contained a Y, that category was coded with a Y. Otherwise, an N was coded. If any response contained an L (Limited) or T (To be Determined), a T was coded. All narrative comments were copied from the response.
- **Alternative Response**: If any responses contained a Y, that category was coded with a Y. Otherwise, an N was coded. All narrative comments were copied from the response.
- **Police Department Value**: Responses were averaged and rounded to the nearest whole number.

Of the original 233 CFS types, 37 incidents had no volume in CAD. An additional 15 CFS types were determined to be non-CFS events (e.g., foot patrol, community policing, follow-up). Accordingly, the 37 CFS types with no CAD volume, along with the 15 non-CFS types, were excluded from further evaluation.

BerryDunn provided the merged CFS Evaluation data (with the above items removed) to the OPPD administration for additional coding (the full data list is provided in Appendix A: Table A.1).

3.1.2 Administration Coding Criteria

OPPD administration was asked to provide additional coding using the criteria below, with full consideration of the combined responses from operational personnel.

Criminal/Ordinance Incidents:

- Does this CFS type require an in-person officer response?
- Could this CFS type possibly be handled in person by a non-sworn staff member?
- Could this CFS type possibly be diverted to a TRU or an online reporting portal?

Non-Criminal Incidents:

- Does this CFS type require an in-person officer response?
- Could this CFS type possibly be handled in person by a non-sworn staff member?
- Could this CFS type possibly be diverted to a TRU or an online reporting portal?

- Does this CFS type require a police response at all (assuming another resource can be identified)?
- Is it possible that this CFS type might not always require a police response?

Category Removal:

- Are there any categories of CFS types that do not apply to the OPPD, or that cannot otherwise be diverted?

3.1.3 Administration Coding Outputs

OPPD administration reviewed 86 criminal/ordinance CFS types. Of those, 63 were determined to require an officer response (e.g., aggravated assault, robbery, sexual offenses). Similarly, the OPPD administration reviewed 95 service incidents (including traffic). Of those, 56 CFS types were determined to require an officer (e.g., hold up alarm, road rage, suicide). Due to categorical similarities (e.g., burglary to auto and theft from auto; found property and turned in property), the remaining 62 CFS types were merged into 46 categories.

BerryDunn then developed an online survey from the evaluation data gathered, for community and stakeholder review of the remaining CFS types. A link to this survey was posted online on the Social Pinpoint project site, and the Village communications team promoted the survey opportunity through its various social media platforms. BerryDunn also directly emailed the survey link to a list of twenty-four stakeholders identified by the Village and OPPD. The survey was active online for approximately three weeks. BerryDunn received 124 viable survey responses (one response was blank). Responses were averaged and have been provided in Table 3.2 below.

3.1.4 Quantitative Data Results Discussion

There are two sections to the data in Table 3.2. The data under the blue headings have been pulled from the OPPD CFS Evaluation dataset (see Appendix A: Table A.1). The data under the green headings have been averaged from the survey responses.

In addition to the group separations, the survey data have been split into three categories:

- Community Service Officer (CSO) response (non-sworn)
- TRU/Online response
- Alternative response

For the CSO, TRU, and online categories, the number shown reflects the average of the respondents' level of acceptance to an alternative response (with 5 being the most accepting and 1 being the least accepting).

Table 3.2: Survey Results

CFS Type	Police Mandate	Risk/Potential Danger	Immediate Response	Type: Crime, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value	Community Service Officer (response averages) Stakeholder	TRU/Online (response averages) Stakeholder	TRU/Online (response averages) Alternative
Abandoned Auto	Y	L	Y	O	Y	Y	0.70	3	4		
Accident - Property Damage	Y	L	Y	T	Y	Y	3.73	6	3		
Assist Fire Department *	Y	P	Y	S	Y	Y	1.82	6	3		
Assist the Public * !	Y	L	Y	S	Y	Y	1.93	5	3		
Check Conditions/Possible Problem!	Y	P	Y	S	Y	Y	0.69	4	3		
Criminal Damage to Vehicle	Y	P	Y	C	N	Y	0.19	7	3		
Falls and Fall Reports *	Y	L	Y	S	Y	Y	0.18	4	4		
Fire Alarm	Y	L	Y	S	Y	Y	0.14	5	3		
Found/Recovered Property *	Y	L	Y	S	Y	Y	0.85	3	4		
Motorist Assist	Y	L	Y	S	Y	Y	0.25	5	3		
Noise Complaint	Y	L	Y	O	Y	Y	0.50	4	3		
Parking Complaint *	Y	L	Y	O	Y	Y	4.12	3	4		
Rowdies	Y	P	Y	S	Y	Y	0.08	6	2		
School Crossing	Y	L	Y	S	Y	Y	0.32	5	4		

* - Compressed category
! - Indicates a category that may include multiple CFS types, including mental health, unhoused, or juvenile

CFS Type	Police Mandate	Risk/Potential Danger	Immediate Response	Type: Crime, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTE's	Police Department Value	Community Service Officer (response averages) Stakeholder	TRU/Online (response averages) Stakeholder	Alternative
Suspicious Incident!	Y	P	Y	S	Y	Y	0.40	6	2		
Telephone Threat	Y	L	Y	C	Y	Y	0.01	4	2		
Tobacco Enforcement	Y	L	Y	O	Y	Y	0.02	3	4		
Traffic Control	Y	L	Y	S	Y	Y	0.41	5	4		
Violation of Local Ordinance	Y	L	Y	O	Y	Y	0.11	5	3		
Graffiti	Y	L	Y	C	Y	Y	0.23	4	4	4	
Lost Property*	Y	L	Y	S	Y	Y	0.22	4	4	4	
Theft From Auto*	Y	P	Y	C	T	Y	0.87	7	3	3	
Theft of Bicycle	Y	P	Y	C	Y	Y	0.17	6	3	4	
Theft of Property Under $500 *	Y	L	Y	C	Y	Y	0.67	5	3	4	
Damage to Property *	Y	P	Y	C	Y	Y	0.77	6	3	3	
Animal Complaints - Other	Y	L	Y	O	Y	Y	0.17	3	4	4	
Animal Bite	Y	L	Y	O	Y	Y	0.07	4	3		
Barking Dog	Y	L	Y	O	Y	Y	0.02	2	4		
Identity Theft *	Y	L	Y	C	Y	Y	0.53	5		3	

* - Compressed category

! - Indicates a category that may include multiple CFS types, including mental health, unhoused, or juvenile

CFS Type	Police Mandate	Risk/Potential Danger	Immediate Response	Type: Crime, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTE's	Police Department Value	Community Service Officer (response averages)	TRU/Online (response averages)	Alternative
									Stakeholder	Stakeholder	
Telephone Scam	Y	L	Y	C	Y	Y	0.01	4		4	
Station Report	Y	L	Y	S	Y	Y	1.19	5		4	
Sick or Injured Animal	Y	L	Y	S	Y	Y	0.03	3	4	3	X
Stray Animal	Y	L	Y	S	Y	Y	0.41	3	4	3	X
Bond/Bank Run *	Y	L	Y	S	Y	Y	0.22	2	2	2	None
Landlord Tenant Dispute	Y	P	Y	S	Y	Y	0.07	5	3	3	X
Lock In/Out	Y	L	Y	S	Y	Y	0.10	3	4	3	X
Repossession	Y	L	Y	S	Y	Y	0.00	3	3	3	None
Train Complaint	Y	L	Y	S	Y	Y	0.00	3	4	4	X
Information for the Police	Y	L	Y	S	Y	Y	1.37	4	4		None
Mental Health !	Y	P	Y	S	Y	Y	0.03	6	4		X
Neighbor Dispute	Y	P	Y	S	Y	Y	0.18	5	3		X
Panhandler !	Y	L	Y	S	Y	Y	0.15	4	4		X
Suspicious Substance	Y	P	Y	S	Y	Y	0.00	5	3		X
Unconscious/Fainting	Y	L	Y	S	Y	Y	0.10	6	3		X

* - Compressed category

! - Indicates a category that may include multiple CFS types, including mental health, unhoused, or juvenile

CFS Type	Police Mandate	Risk/Potential Danger	Immediate Response	Type: Crime, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTE's	Police Department Value	Community Service Officer (response averages)	TRU/Online (response averages)	
									Stakeholder	Stakeholder	Alternative
Vagrant !	Y	L	Y	S	Y	Y	0.22	4	3		X
Vehicle Fire	Y	P	Y	S	Y	Y	0.05	6	3		X

* - Compressed category

! - Indicates a category that may include multiple CFS types, including mental health, unhoused, or juvenile complaints.

The survey response data in Table 3.2 generally reflect moderate to strong acceptance levels for alternative CFS responses, with many categories receiving an average response of three or four (with one being least accepting and five being most accepting). Not surprisingly, some incidents that appear to require a sworn officer response, such as rowdies or suspicion, received lower alternative CFS response acceptance scores, averaging a two response.

Based on work done around the country, along with alternative CFS research, BerryDunn is aware that many of the incident types provided in Table 3.2 have been successfully diverted to external resources, non-sworn police staff, or to TRU or online resources. Even though some of the survey categories produced relatively low average scores, the OPPD should be able to divert many of the listed CFS types, including some with relatively low response scores. In turn, this will reduce workloads for sworn staff, and in all likelihood, increase the OPPD's effectiveness in providing service to the community. Despite these likely outcomes, the OPPD should pay attention to the low scores—particularly those that averaged a two. It may be best not to divert CFS types with these lower scores immediately, or at a minimum, the OPPD may need to take additional precautions to help increase community comfort in the alternative processes the department intends to put into place.

In addition to the overall ratings for non-sworn, TRU, or online response, the bottom section of Table 3.2 also reflects CFS types that could be diverted to resources external to the police department. Table 3.3 provides suggested alternative response resources, based on community and stakeholder feedback.

Table 3.3: Resource Suggestions (Community)

Category	Suggested Resources
Landlord Tenant Dispute	Village, Oak Park Housing Authority, Community Relations, Social Worker, Legal Representation, Mediation,
Lock In/Out	Village Works, Locksmith (Village-funded), AAA, Fire Department, Housing Department
Mental Health	STARS Program (like Denver), Social Worker, Mental Health Expert, Thrive, Mental Health Crisis Team, Other Health Paraprofessional
Neighbor Dispute	Social Worker, Community Relations Department, Mediator
Panhandler	Social Worker, Housing Forward
Sick or Injured Animal	Animal Control, Animal Care League, Wildlife Control
Stray Animal	Animal Control, Animal Care League
Suspicious Substance	Social Worker, Mental Health Professional, Fire Department
Train Complaint	Train Conductor/Train Worker, Department of Public Health
Unconscious/Fainting	Health Professional, Fire/Ambulance, Department of Public Health
Vagrant	Social Worker, Housing Forward
Vehicle Fire	Fire Department

Table 3.4 provides suggested alternative response resources from police department staff for the same categories provided in Table 3.3. This data was collected from the initial 31 officers who completed the CFS Evaluation; duplicate suggestions have been consolidated.

Table 3.4: Resource Suggestions (Department)

Category	Suggested Resources*
Landlord Tenant Dispute	Community Relations; CSO, Fire Department; Social Worker; Parking Enforcement; Neighborhood Services
Lock In/Out	CSO; Fire Department; Community Relations; Social Worker
Mental Health	Thrive Counseling Services; CSO; Fire Department; Parking Enforcement; Community Mental Health Services
Neighbor Dispute	Online; Chicago Center for Conflict Resolution; CSO, Fire Department; Parking Enforcement; Community Relations; Neighborhood Services; Thrive; Social Worker
Panhandler	CSO; Thrive; Social Worker; Parking Enforcement; Housing Forward
Sick or Injured Animal	Animal Control; CSO; Fire Department; Thrive; Social Worker; Parking Enforcement
Stray Animal	Animal Control; CSO; Fire Department; Thrive; Social Worker; Parking Enforcement
Suspicious Substance	Fire Department
Train Complaint	METRA Police; CSO; Fire Department; Thrive; Social Worker; Parking Enforcement; Railroad Police
Unconscious/Fainting	Fire Department; Thrive; Social Worker; Parking Enforcement
Vagrant	CSO; Fire Department; Thrive; Social Worker; Parking Enforcement; Social Services; Housing Forward
Vehicle Fire	Fire Department; CSO

*Responses have been edited to reflect suggested deferral resources.

3.2 Qualitative Data

To capture additional details regarding alternative CFS response, BerryDunn conducted several fact-finding discussions. These included in-person interviews with OPPD staff (at all levels), in-person interviews with professional partners (e.g., fire department, EMS) and other stakeholders (community activists, mental health providers), and in-person and virtual meetings with the Village community. The purpose of these sessions was to introduce the Essential CFS Evaluation process, and to solicit input from all relevant stakeholders on which CFS could/should be diverted, and what resources might already exist or need to be created to

facilitate a shift in the traditional CFS response model. The following sub-sections summarize the feedback collected during this process.

3.2.1 Department Responses

Patrol staff at the OPPD expressed concerns over workloads for sworn staff, and accordingly, they are open and interested in developing solutions that reduce workload volumes for patrol. Department staff identified several possible alternative CFS resources including:

- Thrive (mental health)
- Community Mental Health
- Community Relations Department at the Village
- Ambulance/Fire
- Housing Forward
- Oak Park Township Youth Service

During staff discussions, several complaint types were mentioned as possible options for CFS diversion:

- Mental health
- Unhoused
- Traffic complaints
- Graffiti
- Potholes/street repair
- Animal complaints
- Neighbor disputes
- Non-criminal incidents
- Criminal incidents not in progress

Notably, many of the above-listed categories align with existing alternative response models used by other communities and law enforcement agencies.

Staff also indicated they were in favor of non-sworn response, but indicated that there were too few CSOs to manage this volume, and too few resources for animal control (although this would improve if animal control and CSOs duties were combined). Staff also reported they were open to online reporting under the right circumstances. Staff shared the following concerns regarding alternative CFS response:

- Training for TRU. There is a need for specific structure and questions for TRU and online reporting to help ensure collection of the required information.
- Monitoring of online and TRU reports to keep track of them will be critical.
- There is a need for a process for assigning follow-up, where appropriate.
- Elderly people or others may not respond well to an alternative reporting system.
- CSOs do not currently have access to the records management system (RMS).
- There is a lack of dedicated and equipped CSO vehicles.

3.2.2 Stakeholder Responses

Like OPPD staff, the stakeholders BerryDunn spoke with were open to alternative response, particularly those stakeholders who are already providing services (e.g., Thrive, Community Mental Health, Fire Department, and the ambulance service).

The Fire Department and ambulance service indicated that developing clear expectations for when police response is needed would be particularly helpful, and could avoid situations in which the police are dispatched unnecessarily, but also help ensure they are dispatched when their presence would be valuable.

With regard to mental health/crisis response, both Thrive and the Community Health Board indicated support for alternative processes (Thrive is currently a co-responder under contract with the Village). There was no clear consensus regarding a co-response (police and mental health professional/team) versus independent response to mental health/crisis incidents; however, both groups seemed willing to discuss options.

Stakeholders also mentioned alternative response for working with the unhoused population, including the use of Housing Forward. Based on stakeholder conversations, expanding the services/staffing of this group may be an important consideration.

3.2.3 Community Responses

The idea of an alternative response to CFS was new to some of the community members that BerryDunn spoke with. As BerryDunn explained the breakdown of CFS types that could possibly be diverted—those that were not in progress, not serious, and typically included minimal follow-up or evidence— community members seemed open to such a shift. During these conversations, community members suggested specific CFS types for diversion; namely, calls regarding mental health and the unhoused, medical calls, non-violent neighborhood disputes, or minor civil complaints. BerryDunn asked about CSO response to CFS types within the above-described parameters, and community members were open to the idea, but noted safety concerns as a factor for consideration.

Not unexpectedly, some community members suggested that although they could understand the reasoning for diverting certain CFS—or for sending a CSO—some indicated they would be more comfortable with a sworn officer response—even when the new protocols might dictate

otherwise. Some suggested alternative response should be optional, citing those without internet service or the elderly as examples of persons who might object or not have access to an alternative process.

The community members interviewed suggested animal control, ambulance and fire services, Housing Forward, and Thrive as specific resources that may be able to help with diversion of various CFS types.

3.3 Essential CFS Data Summary

Both internal and external direct engagement efforts revealed clear support for an alternative response to CFS (given the appropriate CFS type and circumstances), specifically for using a TRU or online reporting. There was also support for diverting certain CFS volume to trained non-sworn personnel. Those interviewed supported the development of hybrid or independent response models for certain CFS types (e.g., mental health, medicals, fire-related, unhoused). The level of support was stronger internally among the OPPD, but those interviewed externally indicated increasing levels of acceptance for these response shifts, as they learned more about the reasoning and the types of CFS that would be diverted to alternative processes.

Through a series of quantitative evaluation processes, 46 CFS types were isolated for internal alternative response consideration. Of that number, 15 CFS types were also identified as having the potential for external response. These CFS types were placed in a survey, which was distributed to the community and key stakeholders identified by the Village and the OPPD.

Similar to direct engagement discussions, the survey responses suggested clear support for alternative CFS response, including TRU, online, and non-sworn response. The survey also generated suggestions for possible diversion of certain CFS types.

Despite the clear support for alternative responses, there is a visible pattern of which CFS types are more acceptable to divert, and those which have minimal support for diversion. Accordingly, the OPPD should take these acceptance scores into account in considering alternative CFS response adjustments.

4.0 Alternatives to Traditional Police CFS Research

One of the scope items identified in the RFP for this project involved conducting industry research on the traditional police CFS model, including an examination of other models. The RFP posed the following questions:

- What new alternatives to responding to CFS exist or are emerging in the field?
- What are comparable cities across the nation doing?
- Is there data available on the success of these alternatives?

This section provides information from research on alternative CFS responses from selected models in use throughout the U.S. The information in this section has been collected from public sources. A summary of the models is also provided in Appendix B: Table B.1.

4.1 Introduction

The questions outlined above suggest researching alternative CFS models to help the Village determine the most cost-effective, appropriate, and/or innovative process for the OPPD to engage to manage mental health incidents and other CFS not requiring a sworn police response. The goal was to identify an alternative system that provides high quality CFS response for non-police-required services, particularly for those in need of mental health services, whether those resources are internal or external to the OPPD. Although alternative CFS response is commonly discussed in reference to mental health incidents (almost exclusively), nearly all active models that BerryDunn researched or is familiar with involve a hybrid approach which places mental health CFS within a spectrum of incidents that could be diverted to alternative resources.

In reviewing the literature presented in support of this effort to determine the most cost-effective and appropriate ways to deal with mental health and other CFS, many of the reviewed publications and authors/researchers argue that the impetus for change started in 2020 with the murder of George Floyd. While Floyd's murder was an event that appropriately garnered worldwide attention and generated calls for police reform, historic and related research suggests that the police/mental health crisis, in particular, started long before recent events. Some have even suggested that over the last decade, the systematic closing down of publicly-funded hospitals and other service reductions for people suffering from mental illness are largely responsible for the increasing challenges experienced by police personnel in managing these crisis events. So, although it may be accurate that Floyd's murder has been a catalyst for broader changes in CFS response, many agencies have been using alternative response for a long time. In fact, one of the most well-known models, Crisis Assistance Helping Out on the Streets (CAHOOTS), has been in place for thirty years.

Despite the longevity of the CAHOOTS program, most models BerryDunn researched are relatively new, and accordingly, there is little data to validate program effectiveness. While there are various models in use, the three most common types appear to be: (1) officer crisis

intervention team (CIT), (2) co-responder, and (3) vendor/third-party response (definitions and explanations of these models are included in Appendix C: Table C.1). Each method has various degrees of positives and negatives depending on the needs of the community, and each is affected by workload demands, available staffing, and budget conditions.

4.2 Alternative CFS Response Models

This subsection highlights research information and CFS response data that BerryDunn collected for this project. BerryDunn has also summarized known information about several alternative CFS models in Appendix B: Table B.1.

4.2.1 Mental Health Statistics

Over the past 30 years, law enforcement has been inundated with CFS related to individuals experiencing a mental health incident or crisis. In the process, law enforcement officers have become de-facto social workers in responding to CFS involving suicidal ideation, self-harm, and individuals who are in mental distress. Many of these individuals are also chemically dependent, homeless, and/or are transient and live off the grid, increasing the likelihood that their mental health needs are underserved.

Research suggests there are larger populations of those in need of mental health services in larger urban areas; however, this does not mean that smaller law enforcement agencies have any less of a challenge. Although certain data indicate a greater need in urban areas, there is no data that suggests certain community types (e.g., urban, suburban, rural) will experience a specific CFS percentage that tracks with national statistics or averages. In short, the volume of need is not predictable based on community size, but rather, it is assessed based on the needs of each unique community.

One noted problem specific to mental health incidents is that mental health behaviors are often criminalized, and these subjects are commonly arrested and placed into the criminal justice system. Incarceration, whether at the local or state level, often further isolates individuals in need of mental health services. As an example of the prevalence of mental health incidents, the American Psychological Association (APA) estimates that approximately 20% of available patrol officer time is spent dealing with individuals affected by a mental health crisis in some manner. Further, a 2018 study conducted by A. C. Watson, and J. D. Wood estimates that 6-10% of the CFS the Chicago Police Department responds to involve individuals with a mental health need.[141]

In addition, information presented by Mental Illness Policy Org. highlights the increases in mental health response by the New York City Police Department (NYPD). Reportedly, in 1976, the NYPD responded to an estimated 1,000 CFS for those in emotional distress. Those numbers rose to 20,843 in 1980; 46,845 in 1985; and to 64,424 in 1998. In a paper authored by

[141] Everyday police work during mental health encounters: A study of call resolutions in Chicago and their implications for diversion - PMC (nih.gov)

Arthur Cotton in 2017 that explored mental health response issues facing law enforcement, the author found that an estimated 5-10% of CFS he reviewed were mental health related.[142] Although these studies point to a significant service need, reliable data on this volume is not available.

One significant complication to an accurate and true representation of how many CFS are mental health related involves inconsistent and inaccurate data collection and coding (a national condition and one BerryDunn also observed with the OPPD). For example, some incidents are coded as criminal activity, some are coded as a medical-related, and others are coded as service-related (and numerous other inaccurate code categories). Moreover, many legitimate criminal, medical, or service incidents have mental health connections, even if a mental health crisis did not prompt the interaction, and even if professional mental health staff did not report to the scene. These coding issues—and failures to document a mental health connection with any CFS—create problems in developing a clear picture of the volume of mental health needs in any geographic area. This impacts the ability of the agency to quantify the need, which complicates the proper staffing level for alternative CFS response. Additionally, even if a particular agency codes these incidents in a manner that can be used to identify volumes, the lack of national standards in data collection and reporting makes cross-comparisons impossible, further complicating development of an appropriate staffing model.

It is also worth noting that as indicated above, mental health challenges are often interwoven into other police CFS responses. Accordingly, agencies considering alternative CFS response should do so with an understanding that many CFS that do not originate or present as having a mental health connection, may involve one. Capturing and coding this data could be an important aspect of developing a broad understanding of the need for mental health services.

4.2.2 Methods of Service

A review of contemporary research across law enforcement in the United States, Canada, and Australia provides three primary styles of response to dealing with mental health crisis CFS. The first is the CIT model, which originated in Memphis, Tennessee. In this model, law enforcement officers are provided with a 40-hour training course on how to interact with individuals in mental distress. This model still involves a law enforcement response, and officers handle everything from the start of the call to final disposition. Despite this focused training, there have still been problems related to unnecessary use of force (UOF), escalation, and criminalization of behavior in those CFS involving mental health issues. The overall cost of CIT training is somewhat varied, but costs around $800 per officer.

A second primary model involves co-response, in which law enforcement is partnered with private/government social workers who respond as a collective unit to deal with those calls identified as someone experiencing mental health distress or crisis. Co-responding officers commonly do so in plain clothes to soften their presence, and they generally respond with a

[142] https://shsu-ir.tdl.org/bitstream/handle/20.500.11875/2285/1723.pdf?sequence=1&isAllowed=y

social worker or other professional staff member. Most often, these units are secondary responders who are summoned after a primary police department unit has arrived and assessed the situation. Many co-responder units only work Monday through Friday, typically from 8 a.m. to 4 p.m. As part of this model, some agencies have also started to staff social workers and mental health professionals in dispatch centers, to help triage the CFS, and to help dispatchers determine appropriate uniformed response, diversion to CIT units, or diversion to other officers or social workers.

A third primary model involves private vendors who are contracted or hired by community agencies to respond exclusively to mental health CFS, or welfare checks and other identified CFS. These teams typically include non-sworn civilian personnel, and generally include a two to three person response, most commonly in a van that is equipped with general service items for the team's use, and/or food, water, or other essentials, so they can provide some modicum of services to those who do not want additional or formal intervention. The most notable examples of this model include CAHOOTS in Oregon, Support Team Assisted Response (STAR) in Denver, and Canopy in Minneapolis. There are other programs that mirror this model in several ways; however, some of those programs target specific populations (e.g., unhoused) and/or do not have a mental health service focus.

BerryDunn notes here that there are innumerable variations and iterations of models (particularly for mental health and mental-health-related incidents) either in use, or proposed for implementation. However, succinctly, these models can be broken out into three main categories:

- Use of specifically trained sworn police personnel (CIT)
- Use of a co-response model with the police and professional personnel trained as social workers and/or mental health staff
- Contracted services, which operate largely independent of the police department, but which may request assistance based on certain conditions

Given the challenges associated with mental health CFS response, and recognizing that many CFS may include mental health issues that were not apparent at the time of the CFS, BerryDunn recommends that departments consider CIT training as a mandate for all primary responding police personnel. This is true regardless of whether or not the department chooses an alternative response model for CFS and known mental health incidents.

4.2.3 Staffing Models

In reviewing the literature, websites, and related public information, there are a very limited number of 24-hour response teams; this is typically due to cost issues and workloads, but may also be affected by difficulty in securing and retaining qualified staff. Generally, 24-hour response teams appear to be isolated to large urban areas such as Eugene, Oregon, and Minneapolis, Minnesota. For Denver's STAR program, the original pilot included a staffing model for only Monday through Friday, 8 a.m. to 4 p.m., with only one van working the entirety of the patrol response area. Stakeholders found this unacceptable, increased funding, and

expanded the service hours to include longer days and the entire week; however, they do not staff a 24-hour model.

For smaller communities, staffing one or two daily shifts with professional co-responder personnel may provide for diversion of a significant volume of mental-health-related and other CFS, while balancing overall costs.

4.2.4 Funding

Most of the funding sources for these projects appear to be direct line items created by governmental entities, or collaborative grants/partnerships with other government partners (i.e. county/state hospital with local law enforcement). CAHOOTS is a private collaboration between the White Bird Clinic, the City of Eugene, and the Eugene Police Department. Based on BerryDunn's research, expended resources/funds related to co-responder and contract/vendor services demonstrate a positive relationship between allocated budget dollars and services rendered, which allows law enforcement officers more time to respond to non-mental-health issues. Despite this apparent/reported correlation, there is no known data that specifically quantifies and demonstrates this perceived/reported benefit.

In addition, it is worth mentioning that one of the challenges with the third-party vendor/contractor response model is the turnover and burnout of employees. This has become an even more significant issue recently, as some communities have had difficulty finding qualified candidates to fill these positions. It should also be noted that the vendors/contractors still commonly rely on police to respond first to an incident, and many regularly call police to respond to an incident because they feel unsafe, and/or because dispatching the co-responder unit was inappropriate, based on inaccurate or incomplete 911 information, or a misunderstanding of the person taking the call.

4.2.5 Grants

There appears to be an increase in federal government grants that can be used toward creating units that deal with mental health issues. Federal grants have been available through the Bureau of Justice Assistance (BJA) and the National Institute of Justice (NIJ), for example. In some cases, grants have also been issued for sustaining alternative mental health services. There have also been community block grants, private foundation grants, and grants through the U.S. Department Health and Human Services. BerryDunn has not identified any specific federal grant opportunities at this time. Village staff have informed BerryDunn of a possible grant available through the State of Illinois.

Health care insurance providers, as well as hospitals, have also been contacted by communities recently to help with funding of units to deal with mental health problems, and to triage patient entry into their own medical systems. Managing these conditions in the field frees up emergency rooms, and helps hospitals dedicate time to other emergent needs. Additionally, depending upon qualifications and services provided, it may be possible to recover some costs through direct insurance billing.

4.2.6 Creation of Unit

BerryDunn's research and experience suggests that there are some keys to developing a successful unit to deal with mental health issues. These include:

- Developing a solid leadership foundation between all partners/stakeholders to utilize this new engagement methodology
- Standardized policies and procedures which demonstrate the duties, roles, and responsibilities (including communication center protocols)
- Clear contracts for services between partners that also demonstrate duties, roles, responsibilities, and costs
- Appropriate data coding, reporting, and analysis, to evaluate program success

There are also indications in the literature that workers assigned to these units should be offered and afforded the chance to seek mental health support through various means, and minimally, through an employee assistance program (EAP) model. This is important because many of these workers, like law enforcement personnel, experience secondary trauma in managing these incidents.

As with any program of this size and nature, continued programmatic review should be conducted to help ensure that performance metrics are clearly being meet. There are various reasons for this, but chief among them is to demonstrate that the programs are successful and producing intended and expected results. Program evaluation can also assist in identifying process and policy improvements.

Despite the need for such programmatic review, there is very little research data with which to conduct a cost benefit analysis in the utilization of these programs. Although CAHOOTS has been operating for thirty years, and available data suggest it is successful, there has never been a full program review of the CAHOOTS model (or any other model BerryDunn identified in the literature).

4.2.7 Criminal/Violent CFS with Mental Health

In all instances, research suggests that CFS with a criminal or violent nexus should continue to be managed by sworn law enforcement personnel, regardless of any known or suspected mental health overtone. This is also consistent with the Essential CFS Evaluation BerryDunn conducted for the OPPD.

4.3 Conclusion

The research is clear that utilizing alternative CFS response methods has the potential to produce important benefits that include:

- Freeing up sworn law enforcement time to manage other pressing CFS
- Providing more appropriate mental health interventions to those in crisis

- Reducing trauma (and UOF) for those in need of services

By all accounts, diverting CFS to other resources, internal or external, relieves a portion of the work burden typically managed by sworn officers. Given the service demands faced by a growing number of police departments, this is an important benefit.

Similarly, it is inarguable that including professionally-trained social workers and/or mental health workers in an alternative CFS model improves the interactions between those in crisis and responding personnel. Additionally, because of their focused vocation, professional staff are better equipped to provide counseling and connections to other resources, and they are more adept in de-escalating tense situations involving mental health circumstances.

The common alternative response models include:

- Use of specifically trained police personnel (CIT)
- Use of a co-response model with police and professional personnel who are trained as social workers and/or mental health staff
- Contracted services, which operate largely independent of the police department

Departments can experience one or all of the above-listed benefits (among others) by engaging either a co-responder or contracted services model. However, cost remains a factor. Despite the potential for the above-listed benefits, there is a lack of data to confirm or refute the financial benefits of alternative CFS response models. Although it is well-established that certain non-sworn police personnel could manage certain CFS at a reduced cost, utilizing professional staff and/or engaging contracted services may not necessarily reduce costs to the City/department. This can be affected by the model used and the volume of service demands. Arguably, however, even if cost-reductions do not result from implementing an alternative CFS response model, aligning responding personnel with appropriate CFS types will likely produce positive outcomes more consistently.

Although there are notable benefits to alternative CFS response, it would be cost-prohibitive in all but the largest communities for departments to staff an alternative response program that operates 24-hours per day. This is because, for smaller communities (including the Village of Oak Park), there is not enough workload volume to support development of a 24/7 alternative service response unit. In most cases, overnight personnel would be idle and underutilized. For these communities, utilizing a part-time/hybrid model is likely a more cost-effective solution.

Despite the noted cautions about cost, providing the right public safety services to those in need, and utilizing the best resources available, may be a preferred course, even if there are no direct cost savings.

5.0 Essential CFS Evaluation Summary

There are several desired outputs from this Essential CFS Evaluation process which include determining:

- CFS types that should not be diverted and should continue to receive a direct police response
- CFS types that should/could be eliminated from police response, and who could be a possible resource to take on these responsibilities
- CFS types that should/could be diverted to a non-sworn police resource (such as a CSO or animal control) for response
- CFS types that should/could be diverted internally within the police department, either to a TRU or online reporting
- CFS types that should/could involve a hybrid response between the police department and another resource

As part of this review, the police department assessed which CFS will continue to receive an officer response—whether legally mandated, due to possible risk, and/or because of their inherent authority and responsibility as sworn officers. The process also produced data that supports determining which CFS should be diverted to another resource completely, and which could be managed either by non-sworn staff, or through an alternative response program such as a TRU or online reporting. The process also identified opportunities for hybrid/collaborative responses to certain CFS, particularly those related to mental health and unhoused populations.

Although this process has categorized CFS in alignment with the desired outputs above, there is much work for OPPD to do to finalize and operationalize these findings. This includes:

- Developing policies and procedures, both internally and externally (with partner agencies)
- Developing protocols for dispatch and other staff who are at the intake level for CFS
- Training police department staff on these new processes
- Educating the community about these changes
- Receiving approval from government leaders on proposed changes

The OPPD should use the information from this Essential CFS Evaluation process to work collaboratively with all appropriate stakeholders to advance any proposed changes to the CFS response model.

6.0 CFS Recommendations

Based on the totality of the information gathered for the OPPD, including research on alternative CFS models, BerryDunn makes the following recommendations for modifying its CFS response model:

- Provide CIT training to all primary police response personnel
- Develop a comprehensive alternative CFS response plan and seek approval from the Village Board on the new model
    - The plan should consider additional professional non-sworn staff (e.g., mental health worker, social worker), as well as hybrid/collaborative response, contracted response, and on-call response models
- Establish a TRU
- Add non-sworn personnel (similar to CSOs) to staff the TRU, and to manage other in-person responses that do not require a sworn officer
    - Staffing for the TRU and non-sworn services should consistently cover two shifts per day
- Develop CAD CFS types that clearly categorize certain incidents (e.g., mental health, unhoused) so that these data may be easily monitored in the future
- Evaluate hybrid and collaborative responses for appropriate CFS types, and identify whether there are existing resources for response, or if these need to be created and/or augmented
- Develop policies and procedures for the diversion of CFS to the TRU, non-sworn personnel, and other external resources; procedures should consider customer preferences and provide accommodations for those, whenever requested
- Train agency personnel, dispatch, and community partners on the new model
- Provide community education on the new model, including the various reporting capabilities, and how to provide feedback
- Monitor the success of the new model and make appropriate adjustments
    - Program monitoring will rely heavily on documentation of all alternative CFS response; any agreements or contracts with external resources should include a requirement for data collection, and reporting the results to the Village

7.0 Budget Implications

7.1 Staffing

To consistently staff one person in a TRU for two shifts per day, and to consistently staff one person for field response for two shifts per day (four non-sworn staff per day), the OPPD would require approximately eight positions. Using a cost factor of $25/hour for each position, and a 50% overhead cost, the annual cost for each non-sworn staff member would be approximately $86,000. The annual staffing cost for eight positions would be approximately $690,000. Although this number is substantial, the cost is roughly 50% of the expense for a sworn officer.

BerryDunn is not suggesting replacement of sworn positions with non-sworn personnel. Based on BerryDunn's evaluation of numerous data, the OPPD is likely appropriately staffed, although personnel allocations and vacancies may be contributing to workload imbalances. Adding non-sworn staff will not eliminate this imbalance, but it will partially mitigate overall workloads and reduce the total number of personnel required to manage CFS volumes in patrol.

7.2 Equipment

It is likely that the OPPD would require two new/refurbished vehicles for non-sworn staff to use. The OPPD may be able to use recycled police vehicles, which would reduce the initial capital outlay for the vehicles, but there will still be equipment costs for each vehicle, and they would also need to be factored into the fleet replacement cycle. Start-up costs for equipping these vehicles should be minimal, but are estimated at approximately $10,000, which includes a radio, computer, custom graphics, and a cage (for animal control).

7.3 Outsourcing

The costs for possible outsourcing of certain CFS types are more difficult to estimate; these could vary greatly based on numerous factors (e.g., availability of personnel, equipment, facilities). Possible CFS types that might be managed externally would likely fall into a handful of primary categories:

- Mental health/crisis
- Unhoused
- Juvenile issues (non-criminal)

One of the challenges is that these CFS types are not clearly isolated within CAD, and as a result, they cannot be easily quantified. Generally, CFS volume for these categories might be found in one or more of the following CAD CFS types:

- Assist Public
- Check Conditions/Possible Problem
- Mental Health

- Panhandling
- Vagrant

If all of the CFS volume for these types was related to the primary categories (which is not likely), the total required FTEs for this volume would not exceed three. This means that if all of this volume was outsourced, three full-time people could theoretically manage the workload; however, that is not the case.

The primary incident types (mental health, unhoused, juvenile) do not occur within the confines of a 40-hour work week. These incidents occur sporadically throughout the day, without respect to the time of day or day of the week. Having resources available to consistently manage this volume twenty-four hours a day, and seven days a week, would require six staff members for just one position.

In short, the volume is not significant enough to warrant hiring personnel to fully manage these CFS types, and doing so would be cost prohibitive. A more likely model would include:

- Adding personnel (likely 1 – 2 mental health/social workers) to assist the OPPD, either collaboratively or independently
- Contracting with external sources (e.g., Thrive, Community Mental Health, Housing Forward) to support CFS response, either collaboratively or independently
- Developing a process for on-call resource response, using internal or external resources

As an example, adding two full-time mental health/social worker positions would likely cost the Village approximately $300,000 (based on a $100,000 salary and 50% benefits cost). These two resources would likely not be more expensive than a sworn officer, but would have a specific skillset, and would be dedicated to alternative response CFS. BerryDunn estimates that these resources might manage 40-50% of the volume for the targeted CFS types (e.g., mental health, unhoused, juveniles); however, quantifying this volume is not possible at this time, due to limitations in the OPPDs CAD dataset.

Additionally, contracting could be done on a retainer basis or on a per-response basis. If the Village pursues hiring personnel, it is likely that the outsourced CFS volume would decline substantially. Accordingly, it might be in the best interests of the Village to engage a per-response cost method until the outsourced volume stabilizes, and the level of outsourcing needs can be determined.

The above provides only one possible model for moving forward, and is offered as a means to understand potential staffing costs. The OPPD will need to examine all recommendations and possible costs carefully as part of its strategy to develop any alternative CFS response model.

Appendix AA

Table AA.1: CFS Evaluation Data

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
911 HANG UP	Y	P	Y	S	T	Y	0.26	8
ABANDONED AUTO	Y	L	Y	O	Y	Y	0.70	3
ABDOMINAL PAIN PROBLEMS	Y	L	Y	S	Y	Y	#N/A	3
ACCIDENT PERSONAL INJURY	Y	P	Y	T	Y	N	2.16	9
ACCIDENT PROPERTY DAMAGE	Y	L	Y	T	Y	Y	3.73	6
AED ACTIVATION	Y	L	Y	S	Y	Y	0.00	5
AFD	Y	L	Y	S	Y	Y	0.00	5
AGGRAVATED ASSAULT	Y	H	Y	C	Y	Y	0.11	9
AGGRAVATED BATTERY	Y	H	Y	C	Y	N	0.53	9
AGGRAVATED VEHICULAR HIGHJACK	Y	H	Y	C	Y	N	0.36	10
ALLERGIES ENVENOMATIONS	Y	L	Y	S	Y	Y	#N/A	3
ANIMAL BITES	Y	L	Y	O	Y	Y	0.07	4
ANIMAL BITES ATTACKS	Y	P	Y	O	Y	Y	X	5
ANIMAL COMPLAINTS OTHER	Y	L	Y	O	Y	Y	0.17	3

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
ARMED ROBBERY	Y	H	Y	C	Y	Y	0.66	10
ASSAULT	Y	P	Y	C	T	Y	0.08	8
ASSAULT OR SEXUAL ASSAULT	Y	H	Y	C	Y	Y	0.01	10
ASSIST FIRE DEPT	Y	P	Y	S	Y	Y	1.82	6
ASSIST OTHER PD	Y	P	Y	S	Y	Y	1.04	6
AUTO TAKEN WITHOUT CONSENT	Y	L	Y	C	Y	Y	0.02	4
BACK PAIN	Y	L	Y	S	Y	Y	#N/A	2
BANK RUN	Y	L	Y	S	Y	Y	0.12	2
BARKING DOG	Y	L	Y	O	Y	Y	0.02	2
BATTERY	Y	H	Y	C	Y	Y	0.98	8
BE ON THE LOOKOUT	Y	P	Y	S	Y	Y	#N/A	5
BIKE THEFT	Y	P	Y	C	Y	Y	0.17	6
BOMB THREAT	Y	H	Y	C	Y	Y	0.07	9
BOND RUN	Y	L	Y	S	Y	Y	0.10	2
BREATHING PROBLEMS	Y	L	Y	S	Y	Y	0.00	5
BURGLAR ALARM	Y	P	Y	S	N	Y	0.98	6

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
BURGLARY	Y	P	Y	C	Y	Y	1.03	9
BURGLARY REPORT	Y	L	Y	C	Y	Y	0.55	6
BURGLARY TO AUTO	Y	P	Y	C	T	Y	0.62	8
BURNS EXPLOSIONS	Y	H	Y	S	Y	Y	#N/A	8
CAR ALARM	Y	L	Y	S	Y	Y	0.02	4
CARDIAC RESPIRATORY ARREST	Y	L	Y	S	Y	Y	0.07	8
CHECK CONDITIONS	Y	P	Y	S	Y	Y	0.69	4
CHEST PAIN	Y	L	Y	S	Y	Y	#N/A	5
CHILD CUSTODY DISPUTE	Y	P	Y	S	Y	Y	0.09	5
CHILD SAFETY SEAT INSPECTION	Y	L	Y	S	Y	Y	0.00	3
CHOKING	Y	L	Y	S	Y	Y	0.00	7
CITIZEN ASSIST	Y	L	Y	S	Y	Y	0.17	5
CO DET ACT WITH ILLNESS	Y	P	Y	S	Y	Y	#N/A	5
CO DET ACT WITHOUT ILLNESS	Y	L	Y	S	Y	Y	#N/A	4
COMMERCIAL FOOT PATROL	Y	L	Y	S	Y	Y	0.16	4
COMMUNITY POLICING ASSIGNMENT	Y	L	Y	S	Y	Y	1.83	5

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
CONFUSED PERSON	Y	L	Y	S	Y	Y	0.06	6
CONVULSIONS / SEIZURES	Y	L	Y	S	Y	Y	#N/A	5
COUNTERFEIT CURRENCY	Y	L	Y	C	Y	Y	0.01	5
CRIMINAL DAMAGE TO PROPERTY	Y	P	Y	C	N	Y	0.62	7
CRIMINAL DAMAGE TO VEHICLE	Y	P	Y	C	N	Y	0.19	7
CRIMINAL SEXUAL ASSAULT	Y	H	Y	C	Y	Y	0.28	10
CRIMINAL TRESPASS TO LAND	Y	P	Y	C	N	Y	0.30	7
CRIMINAL TRESPASS TO VEHICLE	Y	P	Y	C	N	Y	0.05	7
CRISIS INTERVENTION	Y	P	Y	S	Y	Y	0.81	8
CUSTOMER DISPUTE	Y	P	Y	S	Y	Y	0.19	5
DAMAGE TO PROPERTY	Y	L	Y	C	Y	Y	0.15	5
DAMAGE TO VILLAGE PROPERTY	Y	L	Y	C	Y	Y	0.02	6
DEATH INVESTIGATION	Y	L	Y	C	Y	Y	1.40	8
DECEPTIVE PRACTICE	Y	L	Y	C	Y	Y	0.08	6
DIABETIC PROBLEMS	Y	L	Y	S	Y	Y	#N/A	4
DIRECTED PATROL	Y	L	Y	S	Y	Y	1.00	5

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
DISORDERLY CONDUCT	Y	P	Y	C	Y	Y	0.38	6
DISTURBANCE	Y	P	Y	C	Y	Y	1.13	7
DOMESTIC BATTERY	Y	H	Y	C	Y	Y	1.41	9
DOMESTIC DISTURBANCE	Y	H	Y	C	Y	Y	1.60	8
DRIVING UNDER THE INFLUENCE	Y	P	Y	C	N	Y	0.23	8
DROWNING DIVING SCUBA ACCID	Y	P	Y	S	Y	Y	#N/A	6
DRUG INVESTIGATION	Y	P	Y	C	Y	Y	0.40	6
DRYER FIRE	Y	P	Y	S	Y	Y	#N/A	5
ELECTROCUTION LIGHTNING	Y	L	Y	S	Y	Y	#N/A	6
ELEVATOR ALARM	Y	L	Y	S	Y	Y	0.09	4
ESCORT	Y	P	Y	S	Y	Y	0.37	5
EYE PROBLEMS INJURIES	Y	L	Y	S	Y	Y	#N/A	3
FALL REPORT	Y	L	Y	S	Y	Y	0.15	4
FALLS	Y	L	Y	S	Y	Y	0.03	4
FIGHT	Y	H	Y	C	Y	Y	0.38	8
FINANCIAL IDENTITY THEFT	Y	L	Y	C	Y	Y	0.10	5

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
FIRE ALARM	Y	L	Y	S	Y	Y	0.14	5
FIREWORKS	Y	L	Y	C	Y	Y	0.17	4
FOLLOW UP	Y	L	Y	S	Y	Y	5.64	5
FOOT PATROL	Y	L	Y	S	Y	Y	0.47	4
FORGERY	Y	L	Y	C	Y	Y	0.00	5
FOUND PROPERTY	Y	L	Y	S	Y	Y	0.80	3
GARBAGE CAN FIRE	Y	L	Y	S	Y	Y	0.01	4
GAS LEAK INSIDE	Y	H	Y	S	Y	Y	0.01	6
GAS LEAK OUTSIDE	Y	P	Y	S	Y	Y	#N/A	6
GRAFFITI	Y	L	Y	C	Y	Y	0.23	4
HANDWAVER	Y	L	Y	S	Y	Y	0.13	5
HARASSMENT	Y	L	Y	C	Y	Y	0.04	5
HARASSMENT BY ELEC DEVICE	Y	L	Y	C	Y	Y	0.10	5
HARASSMENT BY TELEPHONE	Y	L	Y	C	Y	Y	0.07	5
HEADACHE	Y	L	Y	S	Y	Y	#N/A	2
HEART PROBLEMS AICD	Y	L	Y	S	Y	Y	#N/A	4

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
HEAT COLD EXPOSURE	Y	L	Y	S	Y	Y	#N/A	4
HEMORRHAGE LACERATIONS	Y	L	Y	S	Y	Y	0.00	6
HIT AND RUN	Y	P	Y	C	Y	Y	1.23	6
HOLD UP ALARM	Y	P	Y	S	Y	Y	0.07	8
HOME INVASION	Y	H	Y	C	N	N	0.09	10
IDENTITY THEFT	Y	L	Y	C	Y	Y	0.43	5
ILLEGAL CONSUMPTION BY MINOR	Y	P	Y	O	Y	Y	0.01	7
IMPERSONATING A PO	Y	H	Y	C	Y	Y	0.00	8
INACCESSIBLE INCIDENT ENTRAP	Y	L	Y	S	Y	Y	#N/A	6
INFO FOR POLICE	Y	L	Y	S	Y	Y	1.37	4
INTOX SUBJECT	Y	P	Y	S	Y	Y	0.06	5
INVALID ASSIST	Y	L	Y	S	Y	Y	#N/A	3
INVOLUNTARY COMMITAL	Y	P	Y	S	Y	Y	0.09	7
JULIE DIG	Y	L	Y	S	Y	Y	#N/A	2
JUV INVESTIGATION	Y	L	Y	S	Y	Y	0.12	5
KIDNAPPING	Y	H	Y	C	Y	N	0.00	10

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
LANDLORD TENANT DISPUTE	Y	P	Y	S	Y	Y	0.07	5
LEAF FIRE	Y	L	Y	S	Y	Y	#N/A	4
LINE TROUBLE ALARM	Y	L	Y	S	Y	Y	#N/A	3
LOCK OUT OR IN	Y	L	Y	S	Y	Y	0.10	3
LOST ARTICLE	Y	L	Y	S	Y	Y	0.14	3
LOST CHILD	Y	L	Y	S	Y	Y	0.03	9
MABAS BOX	Y	L	Y	S	Y	Y	#N/A	4
MABAS INVESTIGATOR	Y	L	Y	S	Y	Y	#N/A	3
MEDICAL ALARM	Y	L	Y	S	Y	Y	#N/A	4
MEET COMPLAINANT	Y	L	Y	S	Y	Y	1.64	4
MENTAL HEALTH	Y	P	Y	S	Y	Y	0.03	6
MISSING ADULT	Y	L	Y	S	Y	Y	0.42	8
MISSING JUVENILE	Y	L	Y	S	Y	Y	0.28	8
MISSING RETURNED	Y	L	Y	S	Y	Y	0.07	6
MOTOR VEHICLE THEFT	Y	P	Y	C	Y	Y	0.39	7
MOTORIST ASSIST	Y	L	Y	S	Y	Y	0.25	5

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
NEIGHBOR DISPUTE	Y	P	Y	S	Y	Y	0.18	5
NOISE COMPLAINT	Y	L	Y	O	Y	Y	0.50	4
NOTIFICATION	Y	L	Y	S	Y	Y	0.07	4
ODOR INVESTIGATION	Y	L	Y	S	Y	Y	#N/A	4
OPEN DOOR	Y	P	Y	S	Y	Y	0.09	5
ORDER OF PROTECTION	Y	P	Y	C	Y	Y	0.04	8
OUTSIDE RINGER	Y	L	Y	S	Y	Y	0.02	5
OVERDOSE POISONING	Y	L	Y	S	Y	Y	0.03	7
PANHANDLER	Y	L	Y	S	Y	Y	0.15	4
PARKING COMPLAINT	Y	L	Y	O	Y	Y	4.09	3
PARKING ENFORCEMENT SI	Y	L	Y	O	Y	Y	0.03	3
PARTY COMPLAINT	Y	L	Y	S	Y	Y	0.02	4
PEEPING TOM	Y	P	Y	C	Y	Y	0.00	8
PERSON DOWN	Y	P	Y	S	Y	Y	0.12	8
PERSON WITH GUN	Y	H	Y	C	Y	N	0.22	9
POWER LINES DOWN/ARCING/SPARKI	Y	H	Y	S	Y	Y	#N/A	7

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
PREGNANCY CHILDBIRTH MISCARR	Y	L	Y	S	Y	Y	#N/A	5
PREMISE CHECK CALLED IN	Y	L	Y	S	Y	Y	0.14	5
PREMISE CHECK OFFICER INITIATE	Y	L	Y	S	Y	Y	4.80	4
PROB SOLV POLICING ASSIGN	Y	L	Y	S	Y	Y	0.00	5
PSYCHIATRIC ABNORMAL SUICIDE	Y	H	Y	S	Y	Y	0.12	8
PUBLIC INDECENCY	Y	P	Y	C	N	Y	0.17	7
PURSE SNATCHING	Y	P	Y	C	Y	Y	0.00	8
RECKLESS DRIVING	Y	P	Y	T	Y	Y	0.40	6
RECOVERED STOLEN AUTO	Y	L	Y	C	Y	Y	0.61	6
RECOVERED STOLEN PROPERTY	Y	L	Y	C	Y	Y	0.00	5
RELOCATED VEHICLE	Y	L	Y	S	Y	Y	0.00	3
REMOVE UNWANTED	Y	P	Y	S	Y	Y	1.24	5
REPOSSESSION	Y	L	Y	S	Y	Y	0.00	3
RESIDENTIAL FOOT PATROL	Y	L	Y	S	Y	Y	0.00	4
RETAIL THEFT	Y	P	Y	C	N	Y	0.76	6
ROAD RAGE	Y	P	Y	T	Y	Y	0.04	6

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
ROWDIES	Y	P	Y	S	Y	Y	0.08	6
RUNAWAY	Y	L	Y	S	Y	Y	0.13	7
RUSE BURGLARY	Y	P	Y	C	Y	Y	0.01	8
SCHOOL CROSSING	Y	L	Y	S	Y	Y	0.32	5
SCHOOL ENFORCEMENT	Y	L	Y	S	Y	Y	0.01	5
SCHOOL ZONE 1 SAFETY CHECK	Y	L	Y	S	Y	Y	0.03	5
SCHOOL ZONE ALL SAFETY CHECK	Y	L	Y	S	Y	Y	0.03	5
SCREAMING PERSON	Y	P	Y	S	Y	Y	0.07	7
SELECTIVE ENFORCEMENT	Y	L	Y	S	Y	Y	0.02	4
SELF INITIATED ACTIVITY	Y	L	Y	S	Y	Y	0.01	4
SEX OFFENDER REGISTRATION	Y	L	Y	S	Y	Y	0.04	6
SHOOTING	Y	H	Y	C	Y	Y	0.62	10
SHOTS FIRED	Y	H	Y	C	Y	Y	1.23	10
SICK OR INJURED ANIMAL	Y	L	Y	S	Y	Y	0.03	3
SICK PERSON	Y	L	Y	S	Y	Y	#N/A	4
SLUMPER	Y	P	Y	S	Y	Y	0.10	6

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
SMOKE INVESTIGATION	Y	L	Y	S	Y	Y	#N/A	5
SNOW COMMAND	Y	L	Y	S	Y	Y	0.00	2
SOLICITOR COMPLAINT	Y	L	Y	O	Y	Y	0.04	4
SPECIAL DUTY	Y	L	Y	S	Y	Y	#N/A	3
SPEED TRAILER	Y	L	Y	S	Y	Y	0.04	3
STAB GUNSHOT PENETRATING TRAUM	Y	H	Y	C	Y	Y	0.00	9
STABBING	Y	H	Y	C	Y	Y	0.02	9
STATION REPORT	Y	L	Y	S	Y	Y	1.19	5
STOVE FIRE	Y	L	Y	S	Y	Y	0.01	3
STRAY ANIMAL	Y	L	Y	S	Y	Y	0.41	3
STROKE	Y	L	Y	S	Y	Y	#N/A	5
STRONG ARM ROBBERY	Y	H	Y	C	Y	Y	0.19	9
STRUCTURE FIRE	Y	H	Y	S	Y	Y	0.27	8
STUCK ELEVATOR	Y	L	Y	S	Y	Y	#N/A	4
SUICIDE	Y	H	Y	S	Y	Y	0.08	8
SUSPICIOUS AUTO	Y	P	Y	S	Y	Y	0.96	6

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
SUSPICIOUS INCIDENT	Y	P	Y	S	Y	Y	0.40	6
SUSPICIOUS NOISE	Y	P	Y	S	Y	Y	0.07	6
SUSPICIOUS ODOR	Y	L	Y	S	Y	Y	0.00	5
SUSPICIOUS PERSON	Y	P	Y	S	Y	Y	1.30	6
SUSPICIOUS SUBSTANCE	Y	P	Y	S	Y	Y	0.00	5
TAMPERING WITH AUTO	Y	P	Y	C	Y	Y	0.12	7
TELEPHONE SCAM	Y	L	Y	C	Y	Y	0.01	4
TELEPHONE THREAT	Y	L	Y	C	Y	Y	0.01	4
TEST TICKET FIRE	Y	L	Y	S	Y	Y	#N/A	2
THEFT FROM AUTO	Y	L	Y	C	Y	Y	0.25	6
THEFT LOST MISLAID PROPERTY	Y	L	Y	C	Y	Y	0.08	5
THEFT OF LIC PLATE	Y	L	Y	C	Y	Y	0.05	4
THEFT OF SERVICE	Y	L	Y	C	Y	Y	0.05	6
THEFT OVER 500	Y	L	Y	C	Y	Y	0.23	6
THEFT UNDER 500	Y	L	Y	C	Y	Y	0.63	6
THREAT REPORT	Y	L	Y	C	Y	Y	0.08	5

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
TOBACCO ENFORCEMENT	Y	L	Y	O	Y	Y	0.02	3
TRAFFIC ARREST	Y	P	Y	C	Y	N	0.82	7
TRAFFIC CONTROL	Y	L	Y	S	Y	Y	0.41	5
TRAFFIC ENFORCEMENT	Y	L	Y	T	Y	N	1.14	6
TRAFFIC HAZARD	Y	P	Y	T	Y	Y	0.00	5
TRAFFIC STOP	Y	P	Y	T	T	N	1.36	7
TRAFFIC TRANSPORTATION ACCIDEN	Y	L	Y	T	Y	Y	#N/A	5
TRAIN COMPLAINT	Y	L	Y	S	Y	Y	0.00	3
TRANSFER PALLIATIVECARE	Y	L	Y	S	Y	Y	#N/A	3
TRAUMATIC INJURIES	Y	L	Y	S	Y	Y	#N/A	7
TRUANCY	Y	L	Y	O	Y	Y	0.00	4
TRUCK ENFORCEMENT	Y	L	Y	T	Y	Y	0.01	3
TURNED IN PROPERTY	Y	L	Y	S	Y	Y	0.05	3
UNCONSCIOUS FAINTING	Y	L	Y	S	Y	Y	0.10	6
UNKNOWN PROBLEM	Y	P	Y	S	Y	Y	0.03	7
UNLAWFUL USE OF WEAPON	Y	H	Y	C	Y	Y	0.44	9

CFS Category	Police Mandate	Risk/Potential Danger	Immediate Response	Crime, Ordinance, Traffic, Service	Other Resources Available	Alternative Response (TRU/Online)	Volume in FTEs	Police Department Value
VACATION WATCH	Y	L	Y	S	Y	Y	0.01	4
VAGRANT	Y	L	Y	S	Y	Y	0.22	4
VEHICLE FIRE	Y	P	Y	S	Y	Y	0.05	6
VEHICULAR HIJACKING	Y	H	Y	C	N	N	0.26	9
VIOLATION LOCAL ORDINANCE	Y	L	Y	O	Y	Y	0.11	5
VIOLATION ORDER OF PROTECTION	Y	P	Y	C	N	Y	0.84	8
VIOLENT OFFENDERS REGISTRY	Y	L	Y	C	Y	Y	0.03	6
WARRANT ARREST	Y	P	Y	C	Y	Y	0.56	8
WASH DOWN	Y	L	Y	S	Y	Y	#N/A	1
WATER RESCUE	Y	L	Y	S	Y	Y	#N/A	5
WELFARE CHECK	Y	P	Y	S	Y	Y	1.51	5

Appendix BB

Table BB.1: Summary Research on Prevalent Alternative CFS Models in Use

City	Model	Data/Notes	Costs
Eugene, Oregon	**CAHOOTS: Crisis Assistance Helping Out on the Streets** Organization: White Bird Clinic. Alternative response, welfare checks, street, and dispatched-based workers. Each CAHOOTS response includes at least an EMT and a crisis response worker, and they may request assistance from police or paramedics as they see fit.	High level data suggests that 20%* of the CFS appropriately triaged are resolved without law enforcement intervention. *This percentage may be inaccurate. CAHOOTS has worked with 13 Cities during May/Jun 2021. Pilot programs are currently happening in Denver, Houston, Los Angeles, Portland, Oregon, and Rochester, New York. Common CAHOOTS response categories: • Check Welfare • Assist Public – Police • Transport • Suicidal Subject • Disorderly Subject • Traffic Hazard • Criminal Trespass • Dispute • Found Syringe • Intoxicated Subject	Funding source: Contract/appropriation from City of Eugene. Direct funding from police department and City budget. Cost is approximately $1M annually
Houston, Texas	**Mobile Crisis Outreach** This is a new program that is in development and deployment.	Limited information and no published data. Changes proposed/enacted by the Mayor • Changed the Houston PD's policy on Body-Worn Cameras to allow for the release of video within 30 days • A ban on "no-knock" warrants for nonviolent offenses	Funding source: Proposed City funding: • Expand crisis case diversion. **$272,140** annually to hire four additional counselors. • Increase the number of Mobile Crisis Outreach Teams by 18 teams; hire 36 additional clinicians; local mental health

		• Appointed a Deputy Inspector General of the new office of Policing Reform and Accountability • Signed an Executive Order to restructure the Independent Police Oversight Board (IPOB) and named a new board chair • Changed how the public can file complaints and access information on a newly designed website with five data dashboards regarding police transparency • Invest $25 million in crises intervention over three years.	authority will need funding to hire**. $4.3 million annually** • Add six CIRT Teams, six additional counselors and six additional MHD at **$2.4 million annually** • Implement Clinician Officer Remote Evaluation (CORE) proposal to provide tele-health technology to 80 HPD CIT Trained Officers on patrol. **$847,875 annually**. • Fund Citywide Domestic Abuse Response Team with a victim advocate and forensic nurse examiner **$800,000 - $1.2 Million annually**.
Oakland, California	**MACRO: Mobile Assistance Community Responders of Oakland** • Community response program for non-violent 911 calls. • The goal is to reduce responses by police, resulting in fewer arrests and negative interactions, and increased access to community-based services and resources for impacted individuals and families, and most especially for Black, Indigenous, and People of Color (BIPOC)	Limited information and no published data. Response Categories • Intoxicated/Drunk in Public • Panhandling • Disorderly Juveniles – group • Disturbance Auto – noise, revving engine • Disturbance Drinkers • Loud Music – Noise complaint • Drunk – Oakland term • Evaluation for Community Assessment Treatment and Transport Team (CATT) response • Incorrigible Juvenile • Found Senile • Indecent Exposure • Standby Preserve the Peace	Funding source: City

		• Check Well Being • Sleeper Three teams on two shifts, day and swing, seven days a week with functioning hours of 07:00 – 15:00 and 15:00 – 23:00 18-month pilot program run by the Oakland Fire Dept. (OFD)	
San Francisco, California	**CART: Compassionate Alternative Response Team** Proposed alternative response program	Limited information and no published data. Proposed Response Categories • Person attempting suicide • Well-being check • Sit/lie ordinance violations • Aggressive panhandling • Homeless encampment • Trespassing • Suspicious person in a car • Suspicious person	Funding source: City ($6M)
Minneapolis, Minnesota	**Canopy** Two-member teams respond to 911 calls about behavioral or mental health-related crises to provide crisis intervention, counseling or a connection to support services.	Limited information and no published data. 24hrs coverage	Funding source: Direct budget/contract with City of Minneapolis – ($3M annually)
Memphis, Tennessee	**CIT Trained Officers** Officers respond without other individuals	Limited information and no published data. Research suggests higher use of force / deadly force with subjects in mental health crisis	Funding source: Direct funding/trainings costs already incorporated into the agency by / and through City budget allocations.
Denver, Colorado	**S.T.A.R.** Medical/Social Workers	Limited information and no published data. No 24hrs Response Original M-F 8hrs with 1 responder van	Funding source: Provided through a mix of Police / City / County and Health Services

		M-Sunday 16hrs 4 responder vans	
Hennepin County, Minnesota	**Embedded Social Workers** Embedded in larger agencies as co-responders	Limited information and no published data. Day Shift 2019 Embedded PD/Social Workers Started 2020 Social Workers at dispatch 911 – Staffed 24hrs/day to determine and triage CFS	Funding source: County ballot initiative
Dakota County, Minnesota	**Crisis Responder / Social Worker** Assigned to 911 center and agencies	Limited information and no published data. 911 full coverage	Funding source: County budget
Boston, Massachusetts	**BEST** Co-responder; police w/trained master level degrees	Limited information and no published data. No information on shifts – but appears to be only assigned to two districts	Funding source: City funded
Victoria Police, Melbourne, Australia	**Original Response by Police** Follow up once determined mental health issues/mental health unit responded	Limited information and no published data. Shifts and unit assignments are not identified	Funding source: Government/Health System

Note: This list is not inclusive of all known models.

Appendix CC

Table CC.1: Alternative CFS Terminology

Term	Definition
Call for Service (CFS)	An action undertaken by a police patrol officer that starts with a call to law enforcement either via 911 or non-emergency number. Additionally any time a law enforcement officer proactively engages with the public for any action that requires documentation by the organization. *It should be noted that not all CFS are officially tracked as some officer(s) engage informally with people, and handle a public situation, which may or may not be a violation of police.*
Crisis Intervention Team (CIT)	A Memphis-created model in which law enforcement officers are provided training to specifically deal with those individuals in a mental health crisis
Co-Responder	A team of a mental health worker, and law enforcement officer whom are specifically trained to responded to CFS's related to mental health situations.
Alternative Response/Social Worker Teams	Non-licensed law enforcement professionals / i.e. social workers/mental health professionals responding to triaged calls for service for those engaged with a mental health crisis or need for intervention.
Welfare Check – Call for Service/CFS	Anytime law enforcement is called/contacted for a non-criminal intervention on an individual. Includes CFS of self-harm / missing individual / suicidal ideations

Appendix C: Race Equity Audit Questions

The following survey questions were provided for community response.

1. What is the Oak Park Police Department doing well in recognizing, understanding, and acting upon DEI issues within the department and the community? In what ways could it improve?
2. Recent high-profile incidents, like the murder of George Floyd (and others), have exposed a deep trust divide between law enforcement and diverse communities. What actions have you observed the Oak Park Police Department taking to bridge that divide? What are some areas for improvement?
3. What does an authentic and transparent relationship look like between the Oak Park Police Department and the diverse residents it serves?
4. Describe how the community is currently (or should be) involved in building trust and transparency between the Oak Park Police Department and the community, particularly with diverse communities.
5. In what ways have you observed the Oak Park Police Department working to develop relationships with diverse members of the community (e.g., racial, ethnic, and/or LGBTQ+)?
6. Have you personally experienced or witnessed discrimination (i.e., unfair, negative, or adverse treatment) by the Oak Park Police Department, based on one or more aspects of the background or identity (e.g., gender, age, ethnicity, or sexual orientation) of one or more of the involved persons? If so, please describe that experience.
7. Do you feel that the Oak Park Police Department has a transparent process to hear citizen complaints, particularly complaints about DEI issues? Why or why not?
8. Do you have anything else to add regarding the DEI efforts of the Oak Park Police Department?

Appendix D: Training Standards

Illinois Law Enforcement Training and Standards Board

JB Pritzker, Governor
Keith Calloway, Interim Director

Phone: 217/782-4540
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In-Service Training Mandates – Effective July 1, 2022

Annually (no minimum hours assigned to annual mandates)

- Crisis intervention training
- Emergency medical response training and certification
- Law updates
- Officer wellness and mental health
- Firearms Restraining Order Act (Certificate Required)
- Firearms Qualification

Every 3-years (30-hours of training - minimum)

- Sexual Assault /Trauma informed response **(all police officers)**
- Constitutional and proper use of law enforcement authority
- Cultural competency (including implicit bias along with ethnic & racial sensitivity training)
- Civil rights
- Human rights
- Procedural justice
- Reporting child abuse and neglect
- Sexual Assault/Abuse Investigator Training (for those who investigate sexual assault crimes)
- Use of Force - At least **12-hours** of hands-on, scenario-based role-playing.)
  - At least *6-hours* of instruction on use of force techniques, including the use of de-escalation techniques to prevent or reduce the need for force whenever safe and feasible or when force must be used, to use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; and to ensure appropriate supervision and accountability
  - At least *6-hours* of training focused on high-risk traffic stops
  - Specific training on officer safety techniques, including cover, concealment, and time
  - Specific training on the law concerning stops, searches and use of force under the Fourth Amendment to the United States Constitution

(the scenario-based hours can be done in any of the aforementioned areas of education & training under Use of Force and are not specific to the '6 & 6' areas only)

Every 5-years (no minimum hours assigned)

- Psychology of Domestic Violence

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