

Cleveland Community Police Commission
Quantification of the Cleveland Police Monitoring Team's Eighth Semiannual Report
Document Created July 2020.

Objective

As part of its mandate outlined by the Consent Decree¹, the CPC has developed a straightforward way for the citizens of Cleveland to follow the Monitoring Team's assessment of the progress the City has made towards fully complying with the Consent Decree. By quantifying the Monitoring Team's assessment, this report will provide the citizens of Cleveland an alternate way to see and understand what progress has been made so far, as well as how much work remains.

Methods

Per the Monitoring Team's Eighth Semiannual Report², each Paragraph of the Consent Decree is given one of five statuses. Each of these statuses is assigned a numerical score to reflect how much progress has been made towards fully complying with the Consent Decree. *Non-compliance* and *Evaluation Differed* are given a score of 0; *Partial Compliance* has a score of 1; *Operational Compliance* is 2; and *General Compliance* has a score of 3. Definitions of these statuses are listed on *Page 2*.

These scores are then added up by section, then divided by the maximum possible score. This is then done for the entire Semiannual Report to get an overall quantitative assessment of how much progress the City has made towards full compliance. As the number of paragraphs varies among the sections, an evenly weighted final score is also provided.

This report also includes scores from the Seventh Semiannual Report³ and any change in scores between semiannual reports is noted.

On *Page 3*, the total score for each section and subsection, the percent of the progress made towards full compliance, changes since the Sixth Semiannual, and overall weighted and unweighted results are listed. *Pages 4-25* break down these scores paragraph by paragraph of the Consent Decree, with any changes in score highlighted. Also, note that, as of the Eighth Report, the Monitoring Team changed the sections' numbering, starting with Section I as opposed to Section III⁴.

¹ US v. Cleveland, ¶ 15 & 18,

https://www.justice.gov/sites/default/files/crt/legacy/2015/05/27/cleveland_agreement_5-26-15.pdf

² Cleveland Police Monitoring Team, Eighth Semiannual Report, July 2020,

https://static1.squarespace.com/static/5651f9b5e4b08f0af890bd13/t/5f0dc503ea043118c97d16e5/1594737927356/FILE_9341.pdf

³ Cleveland Police Monitoring Team, Seventh Semiannual Report, September 2019,

<https://static1.squarespace.com/static/5651f9b5e4b08f0af890bd13/t/5d8104509488304fd1eadbf0/1568736337649/Seventh+Semiannual+Report+-+FILED.pdf>

⁴ Originally, the Monitoring Team kept the section numbering consistent with the Consent Decree, skipping over the first two sections because they were introductory.

Results

In brief, given these metrics, the Monitoring Team's most recent assessment gives the City and CDP an *unweighted* score of **281.5/765, 36.8%** of the way towards full compliance with the Consent Decree, or a *weighted* score of **316.4/1000, 31.6%** of the way towards full compliance. **It is import to note that a full compliance score is NOT necessary for a Consent Decree to be considered effective or complete. The determination of when the City of Cleveland is able to end its Consent Decree is at the sole discretion of the federal court and is based on data and information received from the parties.**

Status Definitions, per the Monitoring Team

Non-Compliance. The City or Division has not yet complied with the relevant provision of the Consent Decree. This includes instances in which the City or Division's work or efforts have begun but cannot yet be certified by the Monitoring Team as compliant with a material component of the requirement.

Evaluation Deferred. This category reflects those limited instances where work in a given area has been intentionally and affirmatively deferred in order to work on other, necessary prerequisites. In these areas, the City or Division could have made more progress in a given area but, for project management reasons, have appropriately focused attention on other areas. Although this still means that the City has a distance to travel to reach General Compliance with the term of the Consent Decree, the intentional and affirmative decision to postpone focus on a given area for project management and implementation purposes is sufficiently different to warrant a separate designation in some cases.

Partial Compliance. The City or Division has made sufficient initial strides or sufficient partial progress toward compliance toward a material number of key components of the provision of the Consent Decree—but has not achieved operational compliance. This includes instances where policies, processes, protocols, trainings, systems, or the like exist on paper but do not exist or function in day-to-day practice. It may capture a wide range of compliance states or performance, from the City or Division having taken only very limited steps toward operational compliance to being nearly in operational compliance.

Operational Compliance. The City or Division has made notable progress to technically comply with the requirement and/or policy, process, procedure, protocol, training, system, or other mechanism of the Decree such that it is in existence or practice operationally—but has not yet demonstrated, or not yet been able to demonstrate, meaningful adherence to or effective implementation, including across time, cases, and/or incidents. This includes instances where a given reform is functioning but has not yet been shown, or an insufficient span of time or volume of incidents have transpired, to be effectively implemented in a systemic manner.

General Compliance. The City or Division has complied fully with the requirement and the requirement has been demonstrated to be meaningfully adhered to and/or effectively implemented across time, cases, and/or incidents. This includes instances where it can be shown that the City or Division has effectively complied with a requirement fully and systemically.

Quantification of the Cleveland Police Monitoring Team's Eight Semiannual Report

Overall Assessment

Sections (to match 8 th semi)	Score	Percent	Change from Seventh	
Section I Total – Community	30/57	52.6%	0	+/- 0%
Section I overview	1/3		0	
Section I A – CPC	26/42		0	
Section I B – DPCs	3/12		0	
Section II – CPOP	6.5/24	27.1%	0	+/- 0%
Section III – Bias-free	7/27	25.9%	0	+/- 0%
Section IV Total – Use of Force	47/111	42.3%	0	+/- 0%
Section IV A – Use of Force Policy	34/57		0	
Section IV B – Use of Force Review	13/54		0	
Section V – Crisis Intervention	31/63	49.2%	0	+/- 0%
Section VI – Search & Seizure	2/27	07.4%	0	+/- 0%
Section VII Total – Accountability	94/210	44.8%	+7	+03.3%
Section VII overview	0/3		0	
Section VII A – Internally Discovered	15/45		+1	
Section VII B – OPS	47/108		+2	
Section VII C – CPRB	20/27		+4	
Section VII D – Discipline	12/27		0	
Section VIII Total – Oversight	14/54	25.9%	+4	+07.4%
Section VIII A – IG	4/18		+4	
Section VIII B – Data	8/30		0	
Section VIII C – Public Information	1/6		0	
Section IX Total – Officers	45/153	28.4%	0	+/- 0%
Section IX A – Training	12/63		0	
Section IX B – Equipment	16/27		0	
Section IX C – Recruitment	15/36		0	
Section IX D – Evaluations	0/18		0	
Section IX E – Staffing	2/9		0	
Section X Total – Supervision	5/39	12.8%	0	+/- 0
Section X A – Supervisors	1/12		0	
Section X B – Intervention	0/15		0	
Section X C – Body Cameras	4/12		0	
Total score out of possible score	281.5/765	36.8%	+11	+01.4%
Total with sections weighted evenly	316.4/1000	31.6%	+5	+00.5%

Section I. Community Engagement and Building Trust

Paragraph	Status	7 th score	8 th score
14. CDP creation of “formal and informal mechanisms that facilitate ongoing communication between CDP and the many Cleveland communities it serves.”	P	1	1
TOTAL	+/- 0	1/3	1/3

Section I A. Community Police Commission, CPC

Paragraph	Status	7 th score	8 th score
15. Creation of CPC to make recommendations, work with Cleveland communities to develop recommendations, and “report to the City and community as a whole and to provide transparency” on reforms.	G	3	3
16. Establishment of CPC Selection Panel to select CPC Commissioners; composition of CPC; and periodic meetings with Chief of Police to “provide recommendations.”	G	3	3
17(a). “[H]old public meetings across the City, complete an assessment of CDP’s biasfree policing policies, practices, and training, and make recommendations.”	G	3	3
17(b). “[A]ssist as appropriate in . . . development of training related to bias-free policing and cultural competency.”	G	3	3
17(c). “[O]n an ongoing basis, assess CDP’s community activities” and “make recommendations” related to “community engagement” and “community confidence”	P	1	1
17(d). “[O]n an ongoing basis, review CDP’s civilian oversight structure to determine if there are changes it recommends for improving CDP’s accountability and transparency”	P	1	1
17(e). “[P]erform other function[s] as set out in this Agreement.”	P	1	1
18(a). “[R]eview and comment on CDP’s policies and practices related to use of force, search and seizure, and data collection and retention.”	P	1	1
18(b). [R]eview and comment on CDP’s implementation of initiative, programs, and activities that are intended to support reform.”	P	1	1
18(c). “[H]old public meetings to discuss the Monitor’s reports and to receive community feedback concerning CDP’s compliance with this Agreement.”	O	2	2
19. “The City will provide access to all information requested by the Commission related to its mandate, authority, and duties unless it is law enforcement sensitive, legally restricted, or would disclose a personnel action.”	P	1	1
20. CPC “will issue [at least annual] reports,” which the “City will post . . . to the City’s website.”	O	2	2

21. "The City will consider and timely respond in writing to the Commission's recommendations for improvements," which "will be posted to the City's website."	P	1	1
22. CPC budget listed as "separate line item" to ensure "sufficient independence and resources."	G	3	3
TOTAL	+/-0	26/42	26/42

Section I B. District Policing Committees, DPCs

Paragraph	Status	7 th score	8 th score
23. Facilitation of "regular communication and cooperation between CDP and community leaders at the local level," with District Policing Committees meeting "at minimum, every quarter."	P	1	1
24. CPC, CDP, and Community Relations Board ("CRB") will "develop a mechanism to recruit and expand" Committee membership." CDP "will work with [Community Police] Commission to select officers for each District Policing Committee."	P	1	1
25. CDP "will work closely with District Policing Committees to identify strategies to address crime and safety issues in their District," considering and addressing identified priorities.	P	1	1
26. "At least annually, each District Policing Committee will present its identified strategies, concerns, and recommendations" to the CPC, with CDP officer who is Committee member presenting to CPC "CDP's assessment of ways to address" the recommendations."	N	0	0
TOTAL	+/- 0	3/12	3/12

Section II. Community & Problem Oriented Policing, CPOP

Paragraph	Status	7 th score	8 th score
27. Implementation of "comprehensive and integrated community and problem oriented policing model" and consultation with CPC regarding the model	P	1	1
28. Ensuring that "mission statement reflects [the Division's] commitment to community oriented policing" / "integrat[ing] community and problem-oriented policing principles into its management, policies and procedures, recruitment, training, personnel evaluations, resource deployment, tactics, and accountability systems."	O/P	1.5	1.5
29. Ensuring "that officers are familiar with the geographic areas they serve," "engage in problem identification," and "work proactively . . . to address quality of life issues."	E	0	0
30. Initial and annual in-service community and problem-oriented policing training "adequate in quality, quantity, type, and scope" that addresses specifically-identified areas	P	1	1

31. Maintenance of “collaborative partnerships with a broad spectrum of community groups,” including CDP meetings with community organizations and District Policing Committees.	P	1	1
32. CDP “meet[ing] with members of the community in each District on a monthly basis and “solic[itiation of] participation from a broad cross-section of community members in each District” to “identify problems and other areas of concern . . . and discuss responses and solutions.”	P	1	1
33. Development and implementation of “systems to monitor officer outreach to the community” that CDP “will use . . . to analyze . . . whether officers are partnering with a broad cross-section of community members to develop and implement cooperative strategies that build mutual respect and identify and solve problems.”	P	1	1
34. “At least annually, CDP will present the results” of paragraph 33 analysis “broken out by District in a publicly-available community policing report” that describes problems, solutions, and obstacles. Report provided to Commission and posted on CDP website.	N	0	0
TOTAL	+/-0	6.5/24	6.5/24

Section III. Bias-free Policing

Paragraph	Status	7 th score	8 th score
35. Delivery of “police services with the goal of ensuring that they are equitable, respectful, and free of unlawful bias,” among other things.	P	1	1
36. “CDP will integrate bias-free policing principles into its management, policies and procedures, job descriptions, recruitment, training, personnel evaluations, resource deployment, tactics, and accountability systems.”	P	1	1
37. CDP will ensure that it “administer[s] all activities without discrimination” on basis of various protected classes.	P	1	1
38. “CDP will develop a bias-free policing policy” incorporating CPC recommendations “that provides clear guidance to officers.”	O	2	2
39–40. Bias-free policing and procedural justice training “adequate in quality, quantity, scope, and type” covering specific areas	P	1	1
41. Supervisor training on bias-free policing and procedural justice issues covering specific areas.	E	0	0
42. Annual in-service training on bias-free policing “adequate in quality, quantity, type, and scope.”	E	0	0
43. Analysis of paragraph 265 data (“including use of force, arrests, motor vehicle and investigatory stops, and misconduct complaints alleging discrimination”).	E	0	0
44. Consideration of “bias-free policing and equal protection” principles in hiring, unit assignment, promotion, and performance assessments.	P	1	1

TOTAL	+/- 0	7/27	7/27
--------------	-------	------	-------------

Section IV. Use of Force

Section IV A. Officer Use of Force Principles & Policy

Paragraph	Status	7 th score	8 th score
45. “CDP will revise, develop, and implement force policies, training, supervision, and accountability systems with the goal of ensuring that force” complies with the Constitution, federal law, and the Consent Decree “and that any use of unreasonable force is promptly identified and responded to appropriately.”	P	1	1
46. “The City will implement the terms of this Agreement with the goal of ensuring that use of force by CDP officers . . . will comply” with at least twelve major, listed principles	P	1	1
47. Division “will ensure that the [use of force] incident is accurately and properly reported, documented, and investigated.”	P	1	1
48. “CDP will track and analyze officers’ uses of force to hold officers accountable for unreasonable uses of force; to guide training and policy; and to identify poor tactics and emerging trends.”	P	1	1
49. Development of use of force policies “that comply with applicable law[,] . . . are adequate to achieve the goals described in paragraph 45,” and “specify that unreasonable use of force will subject officers to the disciplinary process, possible criminal prosecution, and/or possible civil liability.”	O	2	2
50. “CDP’s policies will address the use and deployment of its authorized force techniques, technologies, and weapons.”	O	2	2
51. Weapon-specific policies “will include training and certification requirements that each officer must meet before being permitted to carry and use the authorized weapon.”	O	2	2
52. “No officer will carry any weapon that is not authorized or approved by CDP.”	O	2	2
53. “Prior to the use of any approved weapon, the officer, when possible and appropriate, will communicate to the subject and other officers that the use of weapon is imminent, and allow the subject an opportunity to comply.”	O	2	2
54–83. “CDP will implement policies” for firearms, ECWs (Tasers), and OC (pepper) spray that comply with a host of specific, expressly listed provisions.	O	2	2
84. CDP “will provide all current officers use of force training that is adequate in quality, quantity, scope, and type and that includes” a number of specific, expressly listed elements.	O	2	2
85. CDP “will provide the use of force training described in paragraph 84 to all new officers.”	O	2	2
86. “CDP will provide all officers with annual use of force in-service training that is adequate in quality, quantity, type, and scope.”	O	2	2

87. “CDP will develop and implement a single, uniform reporting system pursuant to a Use of Force reporting policy” that complies with the force Level categorization set forth in the paragraph.	O	2	2
88. Requiring “[a]ll officers using or observing force” to complete a Use of Force Report including a number of specific features and avoiding “conclusory statements, ‘boilerplate’, or ‘canned’ language.”	O	2	2
89. “Officers will be subject to the disciplinary process for material omissions or misrepresentations in their Use of Force Reports.”	O	2	2
90. “Officers who use or observe force and fail to report it will be subject to the disciplinary process, up to and including termination, regardless of whether the force was reasonable.”	O	2	2
91. Requirement to “notify . . . supervisors . . . as soon as practical following any use of force” and if becoming aware of “an allegation of unreasonable or unreported force by another officer.”	O	2	2
92. “Use of Force Reports will be maintained centrally.”	O	2	2
TOTAL	+/- 0	34/57	34/57

Section IV B. Use of Force Investigation and Review

Paragraph	Status	7 th score	8 th score
93. “A supervisor who was involved in a use of force, including by participating in or ordering the force under investigation, will not investigate the incident or review the Use of Force Reports for approval or disapproval.”	E	0	0
94. Setting specific requirements relating to the investigation of low-level, Level 1 force.	P	1	1
95–109. Setting specific requirements relating to the investigation by supervisors and/or CDP chain of command for investigation and review of Level 2 force.	P	1	1
110. “CDP may refer criminal investigations of uses of force to an independent and highly competent agency outside CDP.”	P	1	1
111. Creation and design of dedicated Force Investigation Team (FIT) that “will conduct administrative investigations . . . and criminal investigations” of serious force, “force involving potential criminal conduct,” in-custody deaths, and cases assigned to it by the Chief.	P	1	1
112. Composition of FIT Team	P	1	1
113. “FIT members will receive FIT-specific training that is adequate in quality, quantity, scope, and type” on a host of specific, expressly-listed topics both initially and annually thereafter.	E	0	0
114. “CDP will identify, assign, and train personnel for the FIT to fulfill the requirements of this Agreement.”	E	0	0
115. Response of FIT to use of force scenes. FIT notification of prosecutor’s office. Notification of designated outside agency to	E	0	0

conduct criminal investigation if City elects to use external agency for such investigations			
116. “CDP will develop and implement polices to ensure that, where an outside agency conducts the criminal investigation, FIT conducts a concurrent and thorough administrative investigation.”	P	1	1
117. Memorandum of understanding required between CDP and outside agency containing specific, expressly-listed provisions	O	2	2
118. Setting forth various, specific, and expressly-listed responsibilities of FIT during its investigations.	P	1	1
119. Monitor’s duty to annually review any “criminal investigations conducted by the outside agency” to ensure that they “are consistently objective, timely, and comprehensive.”	E	0	0
120. Providing for delay of compelled interview if “case has the potential to proceed criminally” but otherwise requiring that “[n]o other part of the investigation . . . be held in abeyance” unless “specifically authorized by the Chief” in consultation with investigating agency and prosecutor’s office.	P	1	1
121. Requiring completion of preliminary report presented to Chief or Chief’s designee “as soon as possible, but absent exigent circumstances, no later than 24 hours after learning of the use of force.”	P	1	1
122. Completion of investigation within 60 days. Preparation of FIT investigation report. Review of FIT investigative report by head of Internal Affairs who “will approve or disapprove FIT’s recommendations, or request . . . additional investigation.”	E	0	0
123. Revision of FIT manual to ensure “consisten[cy] with the force principles” and several specific, expressly-listed provisions.	P	1	1
124–30. Establishment and operation of Force Review Board “to serve as a quality control mechanism for uses of force and force investigations, and to appraise use of force incidents from a tactics, training, policy, and agency improvement perspective.”	P	1	1
Total	+/-0	13/54	13/54

Section V. Crisis Intervention

Paragraph	Status	7 th score	8 th score
131. “CDP will build upon and improve its Crisis Intervention Program” in furtherance of four specific, expressly-listed goals, which “will provide a forum for effective problem solving regarding the interaction between the criminal justice and mental health system and create a context for sustainable change.”	P	1	1
132. Establishment of Mental Health Response Advisory Committee (the “Advisory Committee”) “to foster relationships and build support between the police, community, and mental health providers and to help identify problems and develop solutions designed to improve outcomes for individuals in crisis.”	G	3	3
133. Composition of Advisory Committee.	G	3	3

134. “The Advisory Committee will meet regularly and provide guidance to assist CDP in improving, expanding, and sustaining its Crisis Intervention Program.”	G	3	3
135. Advisory Committee will conduct an annual “analysis of crisis intervention incidents to determine whether CDP has enough specialized CIT officers, whether it is deploying those officers effectively, and whether specialized CIT officers” and communications “are appropriately responding to people in crisis,” and will also “recommend appropriate changes.”	E	0	0
136. “The Advisory Committee’s reports and recommendations will be provided” to CPC, “be publicly available, and will be posted on the City’s website.”	G	3	3
137. CDP will designate a Crisis Intervention Coordinator for specific, expressly-identified purposes.	G	3	3
138. “Coordinator will develop and maintain partnerships with program stakeholders and serve as point of contact” and “resource” for other stakeholders.	G	3	2
139. “Coordinator will participate in the Advisory Committee and on a regular basis solicit feedback from the mental health community and specialized CIT officers, call-takers, and dispatchers regarding the efficacy of CDP’s Crisis Intervention Program.”	G	3	3
140. “Coordinator will be responsible for coordinating implementation of the changes And recommendations made by the Advisory Committee, as appropriate.”	O	2	2
141. “Coordinator will be responsible for ensuring the selection of appropriate candidates for designation as specialized CIT officers” and “to ensure that officers, call-takers, and dispatchers are appropriately responding to CIT-related calls.”	P	1	1
142. “Coordinator will create ways to recognize and honor specialized CIT officers, call-takers, and dispatchers.”	E	0	0
143. Initial and annual crisis intervention training to all officers and recruits that is “adequate in quality, quantity, type, and scope.”	O	2	2
144. Initial and annual crisis intervention training for dispatchers and call-takers	O	2	2
145. “CDP will provide enhanced specialized training in responding to individuals in crisis to certain officers (‘specialized CIT officers’),” who will be “called upon to respond to incidents or calls involving individuals in crisis.”	P	1	1
146–47. Outlining various requirements for the “enhanced training” for specialized CIT officers of “at least 40 hours.”	P	1	1
148. Designation of specialized CIT officers, per specific, expressly-listed requirements.	E	0	0
149. “Supervisors will identify and encourage qualified officers across all shifts and all Districts to serve as specialized officers.”	E	0	0
150. “All Field Training Officers” (“FTO”s) “will receive the enhanced specialized crisis intervention training described in	E	0	0

paragraph 146,” though FTOs will “not be designated as a specialized CIT officer” unless they volunteer and have been selected to do so.			
151. “Specialized CIT officers who are dispatched to an incident involving an individual in crisis will have primary responsibility for the scene,” with supervisors “seek[ing] the input of a specialized CIT officer . . . where it is reasonable for them to do so.”	E	0	0
152. “[T]he Coordinator will develop an effective specialized crisis intervention plan. . . to ensure that a specialized CIT officer is available to respond to all calls and incidents that appear to involve an individual in crisis” that includes various, specific, expressly identified requirements. The City “will use its best efforts to ensure that a specialized CIT officer responds to all calls and incidents that appear to involve an individual in crisis.”	E	0	0
TOTAL	+/-0	31/63	31/63

Section VI. Search and Seizure

Paragraph	Status	7 th score	8 th score
160. “CDP will revise, develop, and implement search and seizure policies that comply with applicable law, . . . include the requirements below,” and conform to expressly identified principles.	P	1	1
161–65. Policy requirements for officers for stops, searches, and detentions.	P	1	1
166. “Officers will immediately notify a supervisor when effectuating a custodial arrest for obstructing official business, resisting arrest, or assault on an officer and no other substantive violation is alleged,” and “the supervisor will respond to the scene.”	E	0	0
167. “Officers will not use ‘canned’ or conclusory language without supporting detail in documents or reports documenting investigatory stops, searches, or arrests.”	E	0	0
168. “Officers will articulate the justification for an investigatory stop, search, or arrest in a specific and clear manner in their reports.” CDP “will train officers” on documenting stops. “Supervisors will review all documentation of investigatory stops, searches, and arrests.”	E	0	0
169. Supervisor will review of “each arrest report by officers under their command,” with supervisors reviewing reports for specific, expressly-identified deficiencies.	E	0	0
170–72. Supervisory review of investigatory stops, searches, and arrests.	E	0	0
173. Provision of “initial training that is adequate in quality, quantity, scope, and type on investigatory stops, searches, and arrests, including the requirements” of the Consent Decree that	E	0	0

“will address the requirements of Fourth Amendment and related law, CDP policies,” and specific, expressly-identified topics.			
174–75. Provision of “annual search and seizure in-service training that is adequate in quality, quantity, type, and scope” incorporating specific, expressly-identified topics.	E	0	0
TOTAL	+/- 0	2/27	2/27

Section VII. Accountability

Paragraph	Status	7 th score	8 th score
176. “The City and CDP will ensure that all allegations of officer misconduct, whether internally discovered or alleged by a civilian, are fully, fairly, and efficiently investigated; that all investigative findings are supported by a preponderance of the evidence and documented in writing; and that all officers who commit misconduct are held accountable pursuant to a disciplinary system that is fair, consistent, and provides due process.”	E	0	0
TOTAL	+/- 0	0/3	0/3

Section VII A. Internally Discovered Misconduct

Paragraph	Status	7 th score	8 th score
177. “Internal Affairs will conduct objective, comprehensive, and timely investigations of all internal allegations,” with “findings . . . based on the preponderance of the evidence standard” that must “be clearly delineated in policies, training, and procedures and accompanied by detailed examples to ensure proper application by investigators.”	E	0	0
178. “Internal Affairs will be headed by a qualified civilian” who “will report directly to the Chief of Police.	O	2	2
179. Qualifications for IA investigators	E	0	0
180. Initial training for IA investigators “that is adequate in quality, quantity, scope, and type on conducting misconduct investigations” that addresses specific, expressly identified topics.	G	3	3
181. “[A]nnual training” for IA investigators “that is adequate in quality, quantity, type and scope.”	O	1	2
182. “In each investigation, Internal Affairs will collect and consider” all evidence. “[N]o automatic preference for an officer’s statement over a non-officer’s statement.” No disregard of a “witnesses’ statement solely because of” connection to the complainant or criminal history. IA investigators must “make all reasonable efforts to resolve material inconsistencies between witness statements.”	E	0	0
183. IA “will evaluate all relevant police activity and any evidence of potential misconduct uncovered during the course of the investigation.”	E	0	0

184. IA will not consider guilty plea or verdict as “determinative of whether a CDP officer engaged in misconduct” or justification for “discontinuing the investigation.”	E	0	0
185. IA “will complete its administrative investigations within 30 days from the date it learns of the alleged misconduct.”	E	0	0
186–87. IA investigative report requirements.	E	0	0
188. Forwarding of completed IA investigations “to the officers’ supervisors, the Training Review Committee, the Force Review Board, the Officer Intervention Program, and the Data Collection and Analysis Coordinator.”	E	0	0
189. “CDP will require any CDP employee who observes or becomes aware of any” potential misconduct to “report the incident to a supervisor or directly to” IA.	O	2	2
190. “CDP will develop a system that allows officers to confidentially and anonymously report potential misconduct by other officers.”	O	2	2
191. “CDP will expressly prohibit all forms of retaliation, discouragement, intimidation, coercion, or adverse action, against any person, civilian or officer, who reports misconduct, makes a misconduct complaint, or cooperates with an investigation of misconduct.”	O	2	2
192. “Officers who retaliate . . . will be subject to the disciplinary process.”	O	2	2
TOTAL	+1	14/45	15/45

Section VII B. Office of Professional Standards, OPS

Paragraph	Status	7 th score	8 th score
193. OPS “investigate[s] all civilian complaints it receives, other than those that allege criminal conduct,” which are referred to IA. Excessive force complaints generally retained by OPS. IA investigations referred back to OPS if “determination is made that no criminal conduct occurred.”	O	2	2
194. “The City will ensure that OPS is led by an administrator with the skills, expertise, and experience to effectively manage the intake, tracking, timely, and objective investigation of complaints”; implement PRB training; “assess OPS’s equipment and staffing needs”; and “develop and implement performance standards for OPS.”	G	2	3
195–96. Initial training for OPS investigators “adequate in quality, quantity, scope, and type,” including specific, expressly-listed topics.	O	2	2
197. “OPS Investigators will not be current members of the CDP, and no CDP personnel will have any active role in OPS’s operations.”	O	2	2
198. “The City will ensure that the lawyer representing OPS does not have any actual or apparent conflicts of interest.”	O	2	2

199. “OPS will have its own budget, separate from . . . the Department of Public Safety” that “affords sufficient independence and resources, including sufficient staff and training to meet the terms of this Agreement.”	O	2	2
200. Development and implementation of OPS operations manual “made available to the public” that covers specific, expressly-listed topics.	O	2	2
201. Development and implementation of “a program to promote awareness through the Cleveland community about the process for filing complaints with OPS.”	E	0	0
202. “CDP and the City will work with the police unions . . . to allow civilian complaints to be submitted to OPS verbally or in writing; in person, by phone, or on line; by a complainant, someone acting on his or her behalf, or anonymously; and with or without a signature from the complainant,” with all “complaints documented in writing.”	O	2	2
203. CDP will post and maintain by the intake window at CDP headquarters and all District headquarters a permanent placard describing the civilian complaint process” and containing specific, expressly-listed information.	O	2	2
204. “CDP will provide training that is adequate in quality, quantity, scope, and type to all police personnel, including dispatchers, to properly handle complaint intake, including” with respect to specific, expressly-listed topics.	E	1	0
205. CDP officers “carry complaint forms in their CDP vehicles,” which officers must provide “upon request.” Supervisors will be dispatched to scene when an individual wants to make a complaint, with the supervisor providing a copy of completed complaint form “or a blank form to be completed later by the individual.”	E	0	0
206. “The City and OPS will make complaint forms and other materials outlining the complaint process and OPS’s contact information available at locations” including a number of specific, expressly-listed locations.	O	2	2
207. “OPS’s complaint form will not contain any language that could reasonably be construed as discouraging the filing of a complaint, including warnings about the potential criminal consequences for filing false complaints.”	G	3	2
208. Availability of complaint forms in English and Spanish. “OPS will make every effort to ensure that complainants who speak other languages . . . can file complaints in their preferred language.”	O	2	2
209. “City will ensure that civilian complaints submitted through other existing systems, including the Mayor’s Action Center and the Department Action Center, are immediately forwarded to OPS for investigation.”	O	2	2

210. “OPS will establish a centralized electronic numbering and tracking system for all complaints,” which “will maintain accurate and reliable data regarding the number, nature, and status of all complaints . . . including investigation timeliness and notification of the interim status and final disposition of the complaint.” It “will be used to monitor and maintain appropriate caseloads for OPS investigators.”	E	0	0
211. Biased policing tracked as a separate category of complaint that “are captured and tracked appropriately, even if the complainant does not so label the allegation.”	E	0	0
212. “[A]llegations of unlawful investigatory stops, searches, or arrests” tracked as a separate category of complaints.	E	0	0
213. “[A]llegations of excessive use of force” tracked as separate category of complaints.	E	0	0
214. “OPS will conduct regular assessments of the types of complaints being received to identify and assess potential problematic patterns and trends.”	P	1	1
215. “OPS will produce, at least annually, a public report summarizing complaint trends, including” with respect several specific, expressly-identified areas.	G	1	3
216. Assignment of complaints to Standard and Complex investigatory tracks.	O	2	2
217. Dismissal and/or administrative dismissal of complaint investigations.	O	2	2
218. “OPS will ensure that investigations of complaints are as thorough as necessary to reach reliable and complete findings that are supported by the preponderance of the evidence.”	E	1	0
219. “CDP will ensure that OPS has timely access to all reports related to the incident . . . ,” and authority of OPS “to conduct additional investigation” of civilian complaint when CDP investigation has already taken place relating to the incident.	E	0	0
220. “OPS investigators will attempt to interview each complainant in person” and record the interview.	O	2	2
221. “The Chief will order officers who witnessed or participate in an incident that is the subject of an OPS complaint to cooperate with the OPS investigation,” including by responding to written questions or sitting for an in-person interview.	O	2	2
222. “OPS investigators will have access to any relevant disciplinary information in the record of an officer who is the subject of a current investigation.”	E	0	0
223. “OPS will consider all relevant evidence,” with no preferences for particular witness’s statements, including of officer over a non-officer, or because of connection to complainant or criminal history. “OPS will make all reasonable efforts to resolve material inconsistencies between witness statements.”	E	0	0
224. OPS findings categories.	O	2	2

225. “OPS will document in writing the investigation of each complaint, including all investigatory steps taken, and OPS’s findings and conclusions,” which must “be supported by a preponderance of the evidence.	G	1	3
226. Items for consideration for OPS findings.	E	1	0
227. “OPS will forward all investigations and its written conclusions to PRB in sufficient time for PRB to consider them no later than the second regularly scheduled PRB meeting following completion of the investigation.”	O	2	2
228. “OPS will send periodic written updates” to the complainant at specific, expressly-identified junctures.	E	0	0
229. “[A] complainant may contact OPS at any time to determine the status of his/her complaint.”	E	0	0
TOTAL	+2 (+5, -3)	45/108	47/108

Section VII C. Police Review Board, CPRB

Paragraph	Status	7 th score	8 th score
230. “Mayor will work with the City Council to develop an ordinance to place a Charter Amendment on the ballot” addressing PRB composition and appointment process.	G	3	3
231. “PRB members will not be current or former members of the CDP.”	G	3	3
232. “PRB will have its own budget,” overseen by OPS Administrator and separate from Department of Public Safety, that “affords sufficient independence and resources.”	O	2	2
233–34. Initial training for PRB members “that is adequate in quality, quantity, scope, and type” and that covers specific, expressly-identified topics.	G	1	3
235. PRB meetings open to the public and posted in advance, with “case presentations and PRB votes” occurring during “open session.”	O	2	2
236. “OPS investigators will attend PRB meetings at which their investigations are being considered and present their findings . . .” PRB may “ask the investigator to conduct further investigation” as necessary.	G	1	3
237. “PRB recommended dispositions will be based on a preponderance of the evidence. For each case, PRB shall set forth its conclusion and an explanation of its reasons and supporting evidence in writing, including, when applicable, the justification for departing from OPS’s recommended disposition.”	E	0	0
238. “In cases where PRB is recommending a sustained disposition, in whole or in part, PRB will include a recommendation as to disciplinary or non-disciplinary corrective action.”	O	2	2

239. [Timely] forwarding of PRB recommendations to Chief of Police and Director of Public Safety.	O	2	2
TOTAL	+4	16/27	20/27

Section VII D. Discipline and Disciplinary Hearings

Paragraph	Status	7 th score	8 th score
240. “The Chief of CDP will issue a General Police Order that requires officers to (a) cooperate with the Internal Affairs and OPS investigators; and (b) submit all relevant evidence to the investigators such that it is available for consideration by Internal Affairs or PRB.”	G	3	2
241. Disciplinary hearing requirement, with officer given “opportunity to testify” and suspension of hearing if “officer provides new or additional evidence at hearing,” with matter “returned to IA or PRB for consideration.”	E	0	0
242. Written justification by Chief or Director of decision to “not uphold the charges” or “does not impose the recommended discipline or non-disciplinary corrective action” where PRB previously “recommends the initiation of the disciplinary process and recommends a disciplinary level.”	P	1	1
243. “CDP will track the number of instances in which the Chief or the Director of Public Safety rejects, in whole or in part, PRB’s recommended disposition.”	O	2	2
245. “CDP will ensure that discipline for sustained allegations of misconduct comports with due process, and is consistently applied, fair, and based on the nature of the allegation, and that mitigating and aggravating factors are identified and consistently applied and documented.”	N <i>changed from E</i>	0	0
246. “CDP will review its current matrix and will seek to amend it” “to ensure consistency” and inclusion of a number of specific, expressly-identified features.	O	2	2
247. “All disciplinary decisions will be documented in writing.”	P	1	0
248. “CDP will provide its disciplinary matrix to the Commission, the Police Inspector General, and the police unions for comment.”	O	2	2
249. “CDP will work with the unions to allow for sustained disciplinary findings to stay in an officer’s record for ten years.”	P	1	1
TOTAL	+/-0	12/27	12/27

Section VIII. Transparency & Oversight

Section VIII A. Police Inspector General, IG

Paragraph	Status	7 th score	8 th score
250. “The City will hire an individual or individuals with significant experience in law enforcement practices and civil rights law to serve as a Police Inspector General” (“IG”). City must seek CPC’s	E	0	0

“input in developing minimum qualifications and experience” for IG.			
251. IG work in Office of Mayor but report to Chief of Police.	E	0	0
252. IG “will not be a current or former employee of CDP.”	G	0	3
253–54. Duties and authority of IG.	E	0	0
255. Budget of IG must be “a separate line item” in City budget and “afford sufficient independence and resources” to comply with Consent Decree.	P	1	1
256. IG “will have access to all documents and data necessary to perform the above functions, including any raw data.”	E	0	0
TOTAL	+3	1/18	4/18

Section VIII B. Data Collection and Analysis

Paragraph	Status	7 th score	8 th score
257. “CDP will collect and maintain all data and records necessary to accurately evaluate its use of force practices and search and seizure practices and facilitate transparency and, as permitted by law, broad access to information related to CDP’s decision making and activities. To achieve this outcome, CDP will designate an individual or individuals as the ‘Data Collection and Analysis Coordinator.’”	P	1	1
258. Coordinator “will ensure the collection and tracking of all documents related to uses of force and allegations of misconduct and related materials,” including specific, expressly-listed materials and information.	P	1	1
259. Coordinator “will ensure the creation and maintenance of a reliable and accurate electronic system to track all data derived from force-related documents,” including specific, expressly-identified data	P	1	1
260. Coordinator “will ensure the creation and maintenance of a reliable and accurate electronic system to track data on all vehicle stops, investigatory stops, and searches, whether or not they result in an arrest or issuance of a summons or citation.” The system must conform to a number of specific, expressly-identified requirements.	P	1	1
261. Coordinator must “routine[ly] report . . . relevant data to the Chief of Police, FRB, Training Review Committee, OPS, the [Community Police] Commission, and the Police Inspector General.”	P	1	1
262. Coordinator “responsible for the annual assessment of forms and data collection systems to improve the accuracy and reliability of data collection.”	P	1	1
263. Coordinator “will develop a protocol to accurately analyze the data collected and allow for” various outcome measurements, “subject to the review and approval of the Monitor and DOJ.”	O	2	2

264. Annually, “CDP will conduct an assessment and issue a report summarizing its investigatory stop, search, and arrest data” that addresses various specific, expressly identified topics.	E	0	0
265. Annually, “CDP will conduct an assessment and issue a report of all activities, including use of force, arrests, motor vehicles and investigatory stops, and misconduct complaints alleging discrimination, to determine whether CDP’s activities are applied or administered in a way that discriminates against individuals on the basis of race” or other listed prohibited classes or characteristics, and that addresses various specific, expressly-identified topics.	E	0	0
266. Annual analysis of “prior year’s force” data with FRB.	E	0	0
TOTAL	+/- 0	8/30	8/30

Section VIII C. Public Availability of CDP-Related Information

Paragraph	Status	7 th score	8 th score
267. “[A]ll CDP audits, reports, and outcome analyses related to the implementation” of the Consent Decree will be public.	N	0	0
268. “CDP will post its policies and procedures, training plans, community policing initiatives, community meeting schedules, budgets, and internal audit reports on its website.”	P	1	1
TOTAL	+/- 0	1/6	1/6

Section IX. Officer Assistance and Support

Section IX A. Training

Paragraph	Status	7 th score	8 th score
269. “CDP will ensure that officers receive adequate training to understand: (a) how to police effectively and safely in accordance with CDP policy; [and] (b) the requirements of this Agreement, Ohio law, and the Constitution and laws of the United States,” including in the areas of “procedural justice, bias-free policing, and community policing.”	P	1	1
270. “CDP will expand the scope and membership of the Training Review Committee.”	P	1	1
271–72. “[T]he Training Review Committee will develop a written training plan for CDP’s recruit academy, probationary field training, and in-service training” that addresses a host of specific, expressly-identified issues.	N	0	0
273. “The Training Plan and schedule will be implemented once any objections have been resolved” on a yearly basis.	P	1	1
274. “The Training Review Committee will annually review and updated CDP’s training plan” by “conduct[ing] a needs assessment” that addresses a number of specific, expressly-	N	0	0

identified data and information on real-world trends, needs, policy, and law.			
275. “CDP’s Commander responsible for training” will be in charge of “all CDP training.	P	1	1
276. “CDP will designate a single training coordinator in each District. The Commander responsible for training will establish and maintain communications with each District training coordinator to ensure that all officers complete training as required and that documentation of training is provided to the” training Commander.	P	1	1
277. “CDP will develop recruit academy and in-service curricula that comport with” the Training Plan and Consent Decree requirements.	P	1	1
278. “[T]he training required under this Agreement . . . will be delivered within two years of the Effective Date.”	E	0	0
279. “For all other substantive updates or revisions to policy or procedure, CDP will ensure and document that all relevant CDP personnel have received and read the policy or procedure. Notification of each revision or update will include the rationale for policy changes and the difference between the old and updated policy.”	P	1	1
280. Training Commander reviews all training materials; ensures that they use “a variety of adult learning techniques, scenario-based training, and problem-solving practices”; and “ensure that all curricula, lesson plans, instructor’s qualifications, and testing materials are reviewed by the Training Review Committee.”	P	1	1
281. “CDP will ensure that instructors are qualified and use only curricula and lesson plans that have been approved by the” Training Commander.	P	1	1
282. “CDP will revise, as necessary, its field training program for graduates of the police academy to comport with” the Training Plan and Consent Decree.	E	0	0
283. “The field training program will incorporate community and problem-oriented policing principles, and problem-based learning methods.”	E	0	0
284. Review and revision of Field Training Officer (“FTO”) “participation policy to establish and implement a program that effectively attracts the best FTO candidates” and “revise eligibility criteria” for FTOs.	E	0	0
285. New FTOs and Field Training Sergeants must “receive initial and in-service training that is adequate in quality, quantity, scope, and type, and that addresses” a number of specific, expressly-listed topics and conforms to a number of additional features or requirements.	E	0	0
286. “CDP will create a mechanism for recruits to provide confidential feedback regarding the quality of their field training,” and the Division “will document its response, including the	E	0	0

rationale behind any responsive action taken or decision to take no action.”			
287. “Training Review Committee will, on an annual basis, analyze all aspects of CDP’s FTO program,” “consider emerging national policing practices in this area,” and “recommend, and CDP will institute, appropriate changes to policies, procedures, and training related to its FTO program.”	E	0	0
288. “CDP will document all training provided to or received by CDP officers,” with officers “sign[ing] an acknowledgement of attendance or digitally acknowledge[ing] completion of each training course,” which “will be maintained in a format that allows for analysis by training type, training date, training source, and by individual officer name.”	E	0	0
289. “CDP will develop and implement a system that will allow the Training Section to electronically track, maintain, and produce complete and accurate records of current curricula, lesson plans, training delivered, and other training materials in a centralized electronic file system.”	O	2	2
290. “CDP will develop and implement accountability measures . . . to ensure that all officers successfully complete all required training programs in a timely manner.”	P	1	1
TOTAL	+/-0	12/63	12/63

Section IX B. Equipment & Resources

Paragraph	Status	7 th score	8 th score
291. “The City will implement” paragraphs regarding equipment and resources in order to allow implementation of the Consent Decree “and to allow officers to perform their jobs safely, effectively, and efficiently.”	P	1	1
292. “CDP will complete a comprehensive equipment and resource study to assess its current needs and priorities,” and it “will develop an effective, comprehensive Equipment and Resource Plan that is consistent with its mission and that will allow it to satisfy the requirements of this Agreement.”	O	2	2
293. “CDP’s Equipment and Resource Plan will provide for necessary equipment including, at least” “an adequate number of computers”; “an adequate number of operable and safe zone cars”; “zone cards with reliable, functioning computers that provide officers with up-to-date technology” including computer-aided dispatch, the records management system, and various core law enforcement systems; and “zone cars equipped with first-aid kits.” “This plan also will ensure that CDP properly maintains and seeks to continuously improve upon existing equipment and technology; and is appropriately identifying equipment needs and seeking to utilize, as appropriate, emerging technologies.”	O	2	2

294. “CDP will actively seek input and feedback from the Commission, patrol officers, and supervisors regarding resource allocation, equipment needs, and technological improvements.”	O	2	2
295. “City and CDP” must “us[e] best efforts to implement the Equipment and Resource Plan as required.”	O	2	2
296. “CDP will . . . implement an effective, centralized records management system.”	O	2	2
297. “CDP will utilize a department-wide e-mail system to improve communication and information sharing.”	O	2	2
298. “CDP will employ information technology professionals who are trained to conduct crime and intelligence analysis, who are capable of troubleshooting and maintaining information technology systems and who can identify and suggest appropriate technological advancements.”	O	2	2
299. “CDP will implement an effective employee assistance program that provides officers ready access to the mental health and support resources necessary to facilitate effective and constitutional policing.”	P	1	1
TOTAL	+/-0	16/27	16/27

Section IX C. Recruitment and Hiring

Paragraph	Status	7 th score	8 th score
300. “CDP will review and revise . . . its recruitment and hiring program to ensure that CDP successfully attracts and hires a diverse group of qualified individuals.”	P	1	1
301. “The Mayor will work with the City Council to develop an ordinance to place a Charter Amendment on the ballot that would give the appointing authority greater flexibility in the selection of candidates from the certified eligibility list for the CDP.”	G	3	3
302. “CDP will develop a recruitment policy and a strategic recruitment plan that includes clear goals, objectives, and action steps for attracting qualified applicants from a broad cross-section of the community” and meets certain specific, expressly-listed requirements.	O	2	2
303. “The City will implement the recruitment plan within 60 days of it being approved by the Monitor.”	E	0	0
304. “CDP’s recruitment plan will include specific strategies for attracting a diverse group of applicants,” including officers with various, specific, expressly-listed skills and backgrounds.	P	1	1
305. “In developing and implementing its recruitment plan, CDP will consult with the [Community Police] Commission and other community stakeholders on strategies to attract a diverse pool of applicants.”	P	1	1
306. “[O]bjective system for hiring and selecting recruits” that “employs reliable and valid selection criteria.”	P	1	1

307. “CDP will report annually to the public its recruiting activities and outcomes,” which will include information on various, expressly-listed areas.	E	0	0
308. “[A]ll candidates for sworn personnel positions” will have “psychological and medical examination” and be subject to “drug testing.” Existing officers receive “random drug testing.”	G	3	3
309. “CDP will conduct thorough, objective, and timely background investigations of candidates for sworn positions” that cover various, expressly-listed topics.	P	1	1
310. “CDP will request to review personnel files from candidates’ previous employment and, where possible, will speak with the candidate’s supervisor(s)” and maintain any “salient information . . . in candidate’s file.”	O	2	2
311. “If a candidate has previous law enforcement experience, CDP will complete a thorough, objective, and timely pre-employment investigation” addressing various expressly-identified things.	E	0	0
TOTAL	+/- 0	15/36	15/36

Section IX D. Performance Evaluations and Promotions

Paragraph	Status	7 th score	8 th score
312. “CDP will ensure that officers who police professionally and effectively are recognized through the performance evaluation process” and “are identified and receive appropriate consideration for performance.” Likewise, “poor performance” must be “reflected in officer evaluations.”	E	0	0
313. “CDP will develop and implement fair and consistent practices to accurately evaluate officer performance in areas related to integrity, community policing, and critical police functions, on both an ongoing and annual basis.”	E	0	0
314–15. CDP will use “a formalized system documenting the annual performance evaluations of each officer by the officer’s direct supervisor,” including an assessment of several expressly-listed areas. “Supervisors will meet with the employee whose performance is being evaluated to discuss the evaluation.”	E	0	0
316. “CDP will hold supervisors of all ranks accountable for conducting timely, accurate, and complete performance evaluations of their subordinates.”	E	0	0
317. “CDP will develop and implement fair and consistent promotion practices that comport with the requirements of this Agreement and result in the promotion of officers who are effective and professional.”	E	0	0
318. In considering promotion, “appointing authority will consider” specific, expressly listed “factors.”	E	0	0
TOTAL	+/- 0	0/18	0/18

Section IX E. Staffing

Paragraph	Status	7 th score	8 th score
319. “CDP will complete a comprehensive staffing study to assess the appropriate number of sworn and civilian personnel to perform the functions necessary for CDP to fulfill its mission, and satisfy the requirements of the” Consent Decree. / “CDP will develop an effective, comprehensive Staffing Plan that is consistent with its mission, including community and problem-oriented policing, and that will allow CDP to meet the requirements of” the Consent Decree.	O	2	2
320. Requirements of CDP Staffing Plan.	E	0	0
321. “The City and CDP will employ best efforts to implement the Staffing Plan over the period of time set forth in the approved plan.”	E	0	0
TOTAL	+/-0	2/9	2/9

Section X. Supervision

Section X A. First-line Supervisors

Paragraph	Status	7 th score	8 th score
322. “CDP will ensure that first line supervisors provide close and effective supervision of officers” in a number of express, specifically-identified ways.	P	1	1
323. “CDP will develop and implement supervisory training for all new and current supervisors” that is “adequate in quality, quantity, type, and scope, and will include” a number of specific, expressly-listed topics	E	0	0
324. “Thereafter all sworn supervisors will receive adequate in-service management training.”	E	0	0
325. “CDP will hold supervisors directly accountable for the quality and effectiveness of their supervision, including whether supervisors identify and effectively respond to misconduct and ensure that officers effectively engage with the community.”	E	0	0
TOTAL	+/- 0	1/12	1/12

Section X B. Officer Intervention Program

Paragraph	Status	7 th score	8 th score
326. CDP “will create a plan to modify its Officer Intervention Program (‘OIP’) to enhance its effectiveness as a management tool to promote supervisory awareness and proactive identification of potentially problematic behavior among officers	E	0	0
327. “CDP supervisors will regularly use OIP data to evaluate the performance of CDP officers across all ranks, units, and shifts.”	E	0	0

328. “The OIP will include a computerized relational database that will be used to collect, maintain, integrate, and retrieve data department-wide” in a number of specific, expressly-identified areas.	E	0	0
329. “CDP will set threshold levels for each OIP indicator that will trigger a formal review, and the thresholds will allow for peer-group comparisons between officers with similar assignments and duties.”	E	0	0
330–36. Additional express requirements of OIP	E	0	0
TOTAL	+/- 0	0/15	0/15

Section X C. Body-worn Cameras

Paragraph	Status	7 th score	8 th score
337. “If CDP chooses to use body worn cameras, CDP will provide clear guidance and training on their use, and will implement protocols for testing equipment and preservation of recordings to foster transparency, increase accountability, and build trust, while protecting the privacy rights of individuals.”	P	1	1
338. “Supervisors will review recordings related to any incident involving at least a Level 2 or 3 use of force; injuries to officers; and in conjunction with any other supervisory investigation.”	P	1	1
339. “Supervisors will conduct adequate random and directed audits of body worn camera recordings” and “incorporate the knowledge gained from this review into their ongoing evaluation and supervision of officers.”	P	1	1
340. “Officers will be subject to the disciplinary process for intentional or otherwise unjustified failure to activate body worn cameras in violation of CDP policy.”	P	1	1
TOTAL	+/- 0	4/12	4/12