



The Global CEO Advisory Firm

St. Louis County Police Department Administrative Review Findings & Recommendations

Contents

1	INTRODUCTION	3
1.1	Executive Summary	5
2	PURPOSE	7
3	METHODOLOGY	8
4	PRIORITY FINDINGS & IMMEDIATE RECOMMENDATIONS	10
5	CULTURAL DIAGNOSTIC Part 1: Findings Based on Interviews	13
5.1	Findings.....	13
5.2	Recommendations	15
5.3	CULTURAL DIAGNOSTIC Part 2: Additional Findings Based on Review of Department Policies	17
5.4	Findings	17
5.5	Recommendations	23
6	CRIME CONTROL STRATEGIES	27
6.1	Findings.....	27
6.2	Recommendations	28
7	COMMUNICATION & PUBLIC INFORMATION	31
7.1	Findings.....	31
7.2	Recommendations	32
8	TOOLS AND TECHNOLOGY INFASTRUCTURE & POLICY REVIEW	34
8.1	Findings	34
8.2	Recommendations	38
9	RESOURCE ALLOCATION	40
9.1	Findings	40
9.2	Recommendations	40
10	CONCLUSION	42
11	NEXT STEPS	43

1 INTRODUCTION

Policing in St. Louis County, the State of Missouri and the entire nation is at a crossroads. Law enforcement can continue down the same path or recalibrate efforts to ensure equitable, professional and just community safety services that give hope to those most in need and affords peace of mind and security to residents, businesses and visitors to St. Louis County.

In the past, police faced social challenges using the few tools available to them. Arrest seemed the most obvious and easiest way to clear a call for service: arrest vandals, the homeless, those drinking in public, people with mental illness and those addicted to drugs. Success was measured by a recitation of traffic stops, drug seizures, and murder rates. Police leadership, communities, elected officials, and the media clamored for faster response times and more officers on the street rather than acknowledging the true concept of accountability, which takes time and myriad resources. Today we know that reactive police response rarely addresses the root cause of criminal behavior and can inadvertently marginalize the communities most affected.

In light of the ever-increasing pressures that St. Louis faces as a result of the city's and metropolitan region's persistent levels of crime and disorder, members of the private sector approached Teneo Risk to develop an innovative, impactful and systematic public safety initiative. This initiative aims to restore community trust in the public sector; realize a sustainable reduction in crime, disorder, and fear of victimization; and revitalize the County and City's neighborhoods, business districts, and reputation. In June of 2020, after agreement on scope, assessment approach and timeline, the Civic Progress companies and the St. Louis Regional Business Council hired Teneo Risk, at no taxpayer's expense, to deliver on the initiative beginning with an assessment of both the St. Louis County and St. Louis City Police Departments. The Teneo Risk team is comprised of leading and nationally recognized public safety experts with decades of experience running complex agencies, turning around crime and disorder, and improving communities across the country.

Based on the information Teneo Risk has collected from discussions with St. Louis business, government, law enforcement and community leaders, as well as the perspectives and experience of the law enforcement experts in our team, Teneo Risk developed recommendations tailored to address St. Louis' high crime rates, critical recruitment problems, and complex public safety governance and oversight structure, which continue to draw national public scrutiny and pressure the region's people, businesses and organizations. Our assessment program focuses on understanding the priorities and concerns of key public and private sector stakeholders and identifies areas where re-engineering and improved cooperation between the St. Louis County and St. Louis Metropolitan Police Departments will help realize more responsive and effective delivery of public safety services. This report contains key findings and observations based on six months of detailed study by the Teneo Risk team, as well as recommendations for improvement in the immediate, near, and long-term.

Here and now, there is great opportunity. The County can be a vanguard of national change. By seizing this moment, when political and civic leaders, law enforcement and citizens are examining their collective histories, perceptions, and biases, St. Louis County, in cooperation with the City of St. Louis, and all its stakeholders, can launch actionable transformation by empowering communities to work with public safety servants to create a safer, more equitable St. Louis. While no one can change the past, the lessons learned, and actionable strategies gleaned from those measures, can prompt positive change.

Teneo Risk recommends that this report serve as a guide and foundation for this positive change in so many areas, including a significant reduction in violent crime and improved community relations. The change to come must be rooted in transparency, accountability, and the truest form of justice. Police should always be part of a larger solution that includes collaborating across a wide spectrum of public and private entities to create healthy neighborhoods. The larger change should also address education, job opportunities, social inequity, food insecurity, access to transportation, and health services.

Accountability must apply evenly to both law enforcement and to criminal behavior, and internal policing culture must be rooted in strength of character, dedication to equity, respect for the community and a dedication to uphold the Constitution of the United States fairly and justly for all.

The findings and recommendations included herein would not be possible without the SLCPD personnel and leadership's coordination, candor, and generosity of time and insight. Their continued cooperation and assistance in facilitating and participating in interviews, as well as providing policy documents and materials, enabled Teneo Risk to: develop an understanding of the department's areas of success, challenges, and future opportunities; to identify key findings and recommendations; and, to work collaboratively to spearhead recommendations for operational re-engineering and create a foundation for implementation of recommendations going forward. Further, SLCPD employees' awareness around the current social and political climate, as well as their leadership instincts and commitment to the regions and communities they serve—

evident in our conversations and correspondence—attests to the department’s capacity to cultivate and sustain a proactive, strategic, and holistic approach to policing, community engagement and crime control.

1.1 Executive Summary

The St. Louis County Police Department (SLCPD) is sound in the fundamentals of policing. Its command staff is talented, engaged, well-informed, and service oriented. Its officers are motivated to serve, proud of the agency, and rightfully proud of the work they do.

The agency is unique in that the County itself spans 88 different municipalities with 61 police departments supporting the municipalities. The SLCPD provides full-service police in the unincorporated portions of the County and specialty contracts in 17 municipalities, and various levels of support and service to others. This presents unique challenges for the department's leadership in that each municipality is a politically independent entity. Thus, commanders must report to and satisfy numerous key stakeholders.

The department is governed by the County Board of Police Commissioners. The County Board of Police Commissioners acts independently of the County Executive. In such a system, it is possible that on occasion, the Board may adopt policies, set priorities, or make decisions that are not aligned with those sought or supported by the County Executive.

It is important to note that while hiring, promotion, training, and crime-fighting strategies are part of this report, the work of the department cannot be separated from the societal challenges facing not only St. Louis County, but the country. Questions about race relations, diversity, fairness and equity are being raised across the nation's public and private sectors, including the SLCPD. Teneo Risk has noted a serious racial divide within the organization, best evidenced in the strained relationship between the Fraternal Order of Police (FOP) and the Ethical Society of Police (ESOP). There is a narrowing window of opportunity for the chief to address this racial divide, exert new leadership and lead positive cultural change, some steps of which are currently underway. Additionally, from feedback across the department members with whom we have spoken, Teneo Risk concludes that hiring, training, promotion and transfer policies lack transparency and are perceived to be unfair, biased and/or too subjective. This perception is contributing to an ongoing division within the department.

With respect to crime fighting, the department does not have a coordinated agency-wide methodology to reduce crime. While precinct commanders are properly empowered to lead the crime fight, there is no overall planning, coordination, or strategic deployment of resources to assist them. We noted that there are no regular SLCPD crime strategy meetings among leadership, and collaboration with the St. Louis Metropolitan Police Department (SLMPD) in terms of intelligence and resource sharing to combat crime is nowhere near as advanced and as cooperative as it should be. Additionally, community policing as a strategy is left entirely to precinct commanders, with no overarching department-wide strategy to which all precinct commanders adhere, including coordination by the chief or senior command.

These issues present a range of opportunities for the SLCPD to improve operations, inter-personal relationships, and collaboration within the department and with the community to combat crime and resolve the racial divide challenging the department.

In terms of immediate areas of opportunity for improvement, Teneo Risk has identified three major findings:

- 1. The department must improve its crime-fighting methods, and it must better coordinate with the St. Louis Metropolitan Police Department to collaboratively reduce violent crime.**
- 2. There is a racial divide among the department's employees. While deeply troubling, this divide provides the chief with an opportunity to lead positive organizational and cultural change.**
- 3. The department must improve its engagement with the community it serves, the government entities it works with, its own employees, and the many and varied media that portray what the department does day-to-day to serve the public.**

This report makes many additional findings and outlines numerous recommendations. These findings and recommendations are separated into five domains: cultural diagnostics, crime control strategies, communications, tools and technology, and resource allocation.

Beyond the issuance of this report, the Teneo Risk team stands ready to continue its efforts to assist SLCPD. Every police agency in America is challenged today by events of the past year, by inequities in American society, by ever tighter budgets, etc. Despite these challenges, SLCPD is a strong agency, with extremely talented and dedicated personnel.

The constituents with whom we spoke are excited to employ best-practice crime-fighting strategies and to create fair, equitable, and transparent systems within the agency. These approaches will help ensure the safety and security of the communities they serve.

2 PURPOSE

The purpose of this report is to convey findings and actionable opportunities for the St. Louis County Police Department to reduce crime, improve internal and external relationships and increase community trust in the police.

The structure of this report starts with the methodology Teneo Risk has employed to date, followed by our findings and recommendations based on what we perceive can be best accomplished in the immediate, near, and long-term. It is our hope to continue to work with members of the SLCPD and to focus on equity and inclusion within the department, providing an avenue to improve crime-fighting strategies and to improve the department's communication and accountability to its core constituents.

A deeper analysis of our findings is broken down into five domains as part of our overall assessment. Please note that although there are five main domains, Cultural Diagnostic features two separate sections due to the comparatively high volume of content; section 1 is based upon interviews and section 2 is based upon written policies. The four remaining domains include interviews and policies within one section.

- Cultural Diagnostic
- Crime Control Strategies
- Communications & Public Information
- Tools and Technology
- Resource Allocation

3 METHODOLOGY

The St. Louis County Teneo Risk team utilized qualitative and quantitative methods to review and evaluate policies, processes, systems, practices, and perceptions within the SLCPD. The team, comprised of current and former police leaders, conducted its assessment through interviews, in-person observation, document review, and data analysis.

SUBJECT MATTER EXPERT TEAM

The assessment team is made up of a small group of highly experienced police leaders who have led or been part of comparable-sized jurisdictions. These experts used their experience, knowledge, and skills to make the observations and recommendations contained in this report. The SLCPD assessment team is comprised of:

- Courtney Adante, Teneo Risk/Client Lead, *President, Teneo Risk*
- Daniel, J. Oates, Team Lead; *Former Chief, Miami Beach, Aurora (CO), Ann Arbor (MI), and Chief of Intelligence, NYPD*
- Edmund Hartnett, Team Second; *Former Police Commissioner, Yonkers (NY) and former Deputy Chief, NYPD*
- Loretta Hill, Team Member; *Chief Dallas College Police Department, former Deputy Chief, Miami Beach, Assistant Chief, Arlington (TX)*
- Judy Pal, Team Support; *Former Asst. Commissioner, NYPD; former Chief of Staff, Baltimore & Milwaukee PD, Communications Lead, Atlanta, Savannah and Halifax (Canada) Police*
- David Cagno, Team Support; *Senior Vice President, Teneo Risk and Former Lt. Commander, NYPD*
- Anushka Pinto, Team Support; *Consultant, Teneo Risk*
- Davis Goode, Team Support; *Consultant, Teneo Risk*

County Team Lead: Daniel J. Oates



Daniel J. Oates is a law enforcement and security consultant who recently completed a highly successful 39-year career as a police executive. After serving in varied roles in the senior ranks of the New York Police Department (NYPD), including chief of the Intelligence Division, during the City's dramatic crime-reduction renaissance of the 1990s, Mr. Oates moved on to be a police chief in three cities – Ann Arbor, MI, Aurora, Co. and finally Miami Beach.

With over 18 years as a police chief, Mr. Oates established a reputation as a progressive reformer and successful crime fighter, with major crime dropping in these cities from 24 to 30 percent under his leadership. Mr. Oates' national reputation was secured when he led the police and city of Aurora through the horrific crisis, investigation and aftermath of the then-largest mass shooting in U.S. history, the Century 16 Theater Shooting on July 20, 2012.

Mr. Oates is a graduate of Bucknell University and holds advanced degrees from New York University and New York Law School. He is an admitted attorney in New York, New Jersey and Colorado. Mr. Oates is a long-time member and served on the executive boards of both the Police Executive Research Forum (PERF) and the International Association of Chiefs of Police (IACP) and is a Past President of the Colorado Association of Chiefs of Police. Mr. Oates also served for 15 years on the Criminal Intelligence Coordinating Council (CICC), the national advisory panel of police chiefs and sheriffs, created in 2004 to advise the U.S. Attorney General and Secretary of Homeland Security on intelligence and security strategies in a post-9/11 world.

The team is also drawing on the vast experience of Commissioner William J. Bratton, Teneo Risk Executive Chair, Commissioner Charles H. Ramsey, former Philadelphia Police Commissioner, and Chief Scott Thomson, former Camden, NJ Chief, for guidance and input to the overall observations and recommendations.

INTERVIEWS

The team conducted approximately 80 individual interviews, either in-person or virtual. In addition, team members traveled to St. Louis County to conduct on-site interviews and make observations. Some interviewees were contacted more than once for clarification and further information. Most individuals interviewed were internal to the agency. The team also spoke with members of the St. Louis County Board of Police Commissioners, the St. Louis County Executive, leadership of police agencies within the County, and other key stakeholders.

DOCUMENT REVIEW

This report includes observations drawn from extensive document reviews of collective bargaining agreements, various policies, statistics, correspondence, documentation relating to the Ethical Society of Police and the Diversity and Inclusion Unit, and crime reports.

4 PRIORITY FINDINGS & IMMEDIATE RECOMMENDATIONS

Employees with whom we spoke are proud to be members of, and enjoy working for, the St. Louis County Police Department (SLCPD). This is a sound agency with an ethical foundation. High clearance rates and generally strong morale indicate the department is doing well in many areas and is well resourced. The department, its Communications Center, and its Police Academy are all accredited by the Commission on Accreditation of Law Enforcement Agencies (CALEA), a rare and outstanding triple accomplishment that shows a true commitment to national best practices in policing.

It has been the experience of the experts conducting this assessment that the best way to combat crime and create safe communities involves timely and accurate intelligence, rapid deployment of resources, effective plans and tactics, and relentless follow-up and accountability. Each of these tenets make up what is known throughout law enforcement as the CompStat process. The SLCPD can make great strides to strengthen its crime-fighting abilities and resolve crime issues by adopting the CompStat process, engaging in improved cross-border communication and collaboration with the St. Louis Metropolitan Police Department (SLMPD), and developing a visionary crime plan to address concerns across its jurisdiction and with its neighbors in law enforcement.

Racial inequity affects all aspects of community living, from economic viability, social services, and public safety. While this report analyzes the workings of the St. Louis County Police Department, many of the issues facing the County are not tactical, training, or crime-fighting related, but rather are policy and process-related issues that require reflection, dialogue, and redesign to resolve inequity.

In addition to crime and racial equity issues, communication also remains a challenge for SLCPD. When addressed strategically and communicated properly, the department's efforts on the two initial focus areas – equity among its employees and improving the crime fight – will help the St. Louis County Police Department move forward with a bold action plan to improve the safety and security of every person who lives, works, and visits the St. Louis area.

The St. Louis County Police Department is generally well-run and sound in the fundamentals of policing. Its command staff is talented, engaged, well-informed, and service oriented, as are its rank-and-file police officers, who are rightfully proud to be members of the department. There are distinct opportunities for the agency to enhance its crime-fighting strategies, upgrade its crime analysis capability, coordinate intelligence and crime fighting with the SLMPD, and put in place accountability measures to help create a safer County. The new chief also has a distinct but narrowing window of opportunity to address the internal equity and racial issues that have been present for some time.

What follows is a priority summation of top findings and recommendations. These findings and recommendations are further described in the domain discussions in the full body of this report.

PRIORITY FINDINGS

1. The department does not have a coordinated agency-wide methodology to reduce crime. While precinct commanders are properly empowered to lead the crime fight, there is no overall planning, coordination, or strategic deployment of resources to assist them.
2. The County and City police do not collaborate in fighting crime in a substantive way but only in some joint task force work and occasional ad hoc operations or informal intelligence sharing. The chiefs should establish a meaningful working relationship and commit to regular communication on important issues.
3. There is a serious racial divide within the organization, best evidenced in the competition and open hostility between the Fraternal Order of Police (FOP) and the Ethical Society of Police (ESOP). There is a narrowing window of opportunity for the chief to address this racial divide, exert new leadership, and lead positive cultural change. The FOP and ESOP have many common goals, and these should be the basis for the chief to lead them in a collaborative drive toward positive change.
4. The recently established Diversity & Inclusion Unit, an important facet of moving forward, has not been adequately tasked or utilized. There is confusion among employees about why the unit exists and what it is supposed to achieve. There is a lack of organizational trust in the unit's current leadership as well.
5. Hiring, training, promotion, and transfer policies lack transparency and are perceived to be excessively subjective. All these areas offer opportunity for the new chief to initiate creative and courageous reform.

-
6. The chief has many priority issues to manage and would be well-served by the addition of a chief of staff position on her executive leadership team whose job is to help strategize, prioritize, and communicate the chief's vision and ensure prompt, effective follow-up where needed.
 7. There is a need for an overall, comprehensive communications strategy, one that addresses both internal messaging to employees and external messaging to all the many and varied constituents and customers of the department.
 8. There is a need for consistent policy, training, coordination, and implementation of community outreach and community-policing initiatives and techniques.
 9. The department's Use of Force policy, last updated in 2010, fails to account for many reforms in the profession in the past 10 years and needs to be thoroughly reviewed and updated.
 10. The department's policy that governs how complaints of misconduct against police officers and civilian employees are handled, last updated in 2004, is out of date and substandard by current measure of best practices in policing. It needs to be thoroughly reviewed and updated.
 11. The department does not have a clear policy on when and under what circumstances body camera footage will be released to the public or the media. Failure to have a strong, clear policy in place, and one that leans toward transparency and release reasonably quickly after a controversial incident occurs, could have grave consequences for the department's credibility and perception of transparency with the community.
 12. Not all officers who are routinely engaged in enforcement activity have been issued body cameras, which potentially exposes the department to criticism if a controversial incident occurs and no footage is available to document what occurred.

IMMEDIATE RECOMMENDATIONS

1. Institute a CompStat-like crime-fighting process that demands accountability of all department leaders, via regular meetings chaired by the chief and supported by robust, modern crime-analysis techniques, and by re-imagining and enhancing the department's crime-analysis resources, capabilities, and approach. Focus on 7-day, 28-day and YTD trends of Part 1 crimes, particularly homicides, non-fatal shootings and robberies and compare these trends to the same time periods from the previous year to gauge the effectiveness of the various crime reduction strategies. Share detailed analysis with all officers and empower, encourage, and reward leaders who make smart deployment decisions and surge resources to quickly address emerging crime trends.
2. Focus crime-reduction efforts on shootings and violence in the most challenged areas. Collaborate in a pilot border-crime initiative in full partnership with the St. Louis Metropolitan Police Department (SLMPD), community and federal partners. This pilot should focus on the City of Jennings (SLCPD'S 8TH Precinct) and bordering City of St. Louis neighborhoods (SLMPD's 6th District), as this area offers the best opportunity for early wins and greatest impact. Establish regular, even daily dialogue between the City and County police chiefs and key subordinates about their agencies' joint crime-fighting efforts.
3. Fully share intelligence and crime analysis with the SLMPD and collaborate with, and fully leverage, the combined resources of the SLMPD's Real Time Crime Center (RTCC) and the SLCPD's new Regional Information and Intelligence Center (RIIC), including co-locating personnel in the other's center and arranging for full intelligence, data and video image sharing between these two centers.
4. Conduct a facilitated off-site workshop with the chief and senior leadership, the FOP and ESOP to open constructive dialogue and find a collaborative path forward on the issues of equity and inclusion. The chief must lead and guide the FOP and ESOP to identify and leverage their common interests and begin to resolve their biggest concerns, which include reform ideas on hiring, transfer, and promotion. The parties should start by agreeing on at least one shared goal and a plan of action, such as re-designing the promotion exam for sergeants by adding more transparency and more objective scoring. They should build on any early success with additional collaborations.
5. Identify and select a chief of staff who will serve as a senior aide to coordinate, prioritize, and communicate the chief's mission, vision, objectives, and strategic plan going forward; and ensure prompt, effective follow-up where needed.

6. Create a long-term strategic communications plan that conveys the chief's vision, mission, and direction for the agency to the four foundational stakeholders: employees, elected officials, the community, and the media.
7. Provide additional support (personnel, resources, and training) and communicate a clear mission for the Diversity & Inclusion Unit and create viable and measurable outputs. Determine whether additional capabilities are needed to enable effective leadership in the unit.
8. In this period of pain and introspection about race and policing, the chief should initiate her own signature program of outreach to communities of color, including faith, civic, education, and business leaders. Despite the pandemic, the chief and her new leadership team must find a way to renew and energize these relationships and to convey that they are readily accessible and open to honest input about the performance of their officers.
9. Because regular, helpful feedback is essential to guiding a police department and navigating the varied demands of the community, the chief should create a Resident Advisory Council. It should be composed of a diverse cross-section of influential civic leaders representing the faith, business, school and neighborhood communities who advise the chief in confidence about current issues, serve as a sounding board for new ideas and serve as champions for any new community-policing initiatives the Department seeks to implement.
10. Redesign recruiting, hiring, promotion, and transfer processes to be more transparent. Develop more objective and transparently fair processes to select personnel for training opportunities.
11. Support and enhance the critical work of the precinct-based Neighborhood Policing Officers (NPOs). Create a community affairs aide in the rank of lieutenant or captain, reporting directly to the Chief and charged with assisting the Chief on all community-policing initiatives. This aide should be tasked with ensuring consistent messaging, policy, training, implementation, and follow up of the Chief's community-outreach, problem-solving and partnership-building initiatives throughout the department in full coordination with the precinct commanders and their NPOs.
12. Undertake a complete review and rewriting of the Use of Force policy, taking into consideration the many positive developments and progress in the profession in last 10 years.
13. Undertake a complete review and rewriting of the policy that governs how complaints of misconduct against police officers are handled. Ensure that all allegations of misconduct, even anonymous complaints, are referred to the Bureau of Professional Responsibility (BPR) to ensure that an appropriate investigation takes place, and a record is made of how every citizen complaint is handled. Implement a new policy to address when and under what circumstances body worn camera footage will be released to the public. The policy should lean toward transparency and toward release within 48 to 96 hours after an incident, following appropriate disclosure and discussion with the relevant prosecutor and done with reasonable sensitivity to the interests of affected family members of persons involved.
14. Every sworn officer should be issued a body camera.

The next section outlines the Teneo Risk team's findings and recommendations across five domains. We have deemed some of the findings and recommendations as immediately actionable and have also provided a range of findings and recommendations for near and longer periods of time to enact.

5 CULTURAL DIAGNOSTIC Part 1: Findings Based on Interviews

During the team's initial interviews with Chief Barton and members of the County Board of Police Commissioners, it was clear that assistance which Teneo Risk could provide to help the St. Louis County Police Department become a more inclusive, diverse, and equitable agency was welcome. Both the chief and the Board conveyed that resolving internal issues of racism and gender discrimination were foundational to the overall ability of the department to function at its best. The Board clearly stated that there was a racial divide within the department, and that it must be dealt with head-on before the agency could begin to work on trust and legitimacy issues within the community and begin to achieve meaningful crime reduction.

Despite the pride in the department and affinity toward the job referenced by employees, there is a striking difference in the perception of inequity between white and African American officers. As the still relatively new head of the agency, Chief Barton has a window of opportunity to acknowledge these race-relations issues and provide a path forward to healing, trust, and equity. Equitable processes for officers, additional transparency, and strong communication will result in a more united department, stronger community ties, and a safer, more respected and trusted police agency.

Inequity also extends to gender. The fact that the County still uses the term '*patrolman*' is indicative of an agency steeped in tradition, which can effectively ostracize employees. These findings should come as no surprise, as similar observations regarding diversity in hiring, promotion, and transfer were made in a Police Foundation report issued in 2015.

A significant challenge is the lack of hard data and tracking of demographics relating to recruiting, training, hiring, transfers, and promotions. Teneo Risk requested certain demographic information about hiring and promotion processes several times but was never provided this useful data. The department's Human Resources Director noted that between 2016 and 2018, no demographic data was collected on candidates for hire because the computer program in use did not track this information. A significant step towards transparency and trust will take place when the SLCPD has a system in place for appropriate tracking and provides easy access of this data both internally and externally.

The new chief has now been in her role for over six months and still has an opportunity to be the lead agent of reform on racial and gender equity in the department. Teneo Risk urges that she, her leadership team, and the Board of Police Commissioners respond and implement our priority recommendations in this Cultural Diagnostic Domain as quickly as possible.

5.1 Findings

1. There is a window of opportunity for the new chief to take a leadership role in driving needed cultural change within SLCPD, starting with a reorganization of the department and a setting of new priorities.
2. There is no overall strategic plan for reducing crime or resolving the internal racial divide, and there is a need for a new, comprehensive, and fully coordinated community policing strategy. The chief must drive reform in these areas and create internal organizational support and external community support to assist her.
3. Both the FOP and ESOP want their voices heard when it comes to policy creation and revision. Both feel strongly that employee input from their groups would contribute to additional fairness and equity in departmental processes.
4. The FOP and ESOP share a common interest in creating a more transparent and fair system of promotions and the transfer of personnel to coveted special assignments, which are typically core concerns of experienced officers and their elected representatives in any department.
5. Both the FOP and ESOP also believe the department should offer additional training for newly promoted officers and should create a unit committed to employee wellness, which is critical because both sides see officers continuing to deal silently with PTSD and other emotional and physical wellbeing issues.
6. The Diversity and Inclusion Unit is under-resourced, under-tasked, under-utilized, and without a clear mission or purpose. Members of the unit require much more training to fully develop the skills to lead the workforce. Unit members need to fully understand and convey the proper national best practices in this area.
7. SLCPD's basic capture of data on the demographics of candidates for police officer at each stage of the hiring process, which is essential in the modern era from a recruitment and planning standpoint, as well as to protect against discrimination claims, is lacking.

8. The Recruiting Unit is understaffed, and while it does conduct outreach to minority communities, it lacks a clear plan of outreach to diversify the department. Because of the deficiency in key data, it also lacks the ability to objectively analyze any potential disparate impact in its recruitment, testing, and background processes, leaving the department unable to smartly adjust its processes and open to criticism.
9. There are five part-time retired officers and three full-time officers who serve as background investigators. The depth of their training, their sensitivity to issues of race, and their generational gap from the current generation of candidates for police officer are all points of skepticism in the current climate of the organization and feed a perception of overall unfairness regarding minority hiring.
10. The department is certain to come under greater scrutiny for its hiring practices in the years ahead from outside advocacy groups demanding more diversity and from within its ranks by entities such as the FOP and ESOP.
11. The Academy does not capture readily accessible demographic data of recruits who fail out of the Academy, which suggests a lack of critical inquiry by the department into whether its processes have a disparate impact on a particular group.
12. The Academy does not teach use of force until late in the recruits' training cycle. While this is done for a practical reason, to accommodate for modest differences in policy in classes that have a mix of recruits employed by different agencies, lack of constant training throughout the Academy curriculum serves to de-emphasize the critical importance of compassion, discipline, and judgment as core elements of use-of-force decisions in modern policing.
13. The Field Training Instructor (FTI) program, which is critical to the development of new police officers and the overall culture of the agency, is not managed consistently across the organization.
14. The promotion process is ripe for revision and must be more transparent and objective if employees are to accept it as fundamentally fair and equitable.
15. The criticisms of the promotion policies cross racial lines in the department, affording the chief an opportunity to close the racial divide by tackling collaborative reform in this area.
16. Leadership training is lacking for newly promoted supervisors.
17. Executive management does not play an active role in determining what topics should be covered in annual in-service training, which suggests that management may not be doing enough to ensure that all agency training fully aligns with the goals, values and mission of the organization.
18. A fair and transparent process is needed to determine who will attend training opportunities to alleviate perceptions that favoritism plays a role in these prime opportunities.
19. There is no policy in place to require that every citizen complaint be logged and investigated, leaving the agency open to criticism that it is not committed to full transparency and accountability regarding allegations of officer misconduct.
20. There is no process in place to automatically notify the prosecuting attorney when the department determines through an internal investigation that an officer made a "false official statement."
21. The act of making a "false official statement" is not an automatic termination offense. This leaves the SLCPD open to valid criticism that it is keeping officers who have been proven untruthful on the payroll and thereby jeopardizing future criminal prosecutions in which such officers' testimony might be needed.
22. The department does not conduct random reviews of body worn camera footage to ensure that officers are complying with department policy. Random audits of body camera footage are becoming a best practice nationally to ensure appropriate officer behavior.
23. There is no specialized Equal Employment Opportunity investigative process. Because there is no clear policy in place for investigating these types of complaints, staff has used various methods to seek resolution of complaints of discrimination or harassment.
24. There is no in-house peer support program overseen by a qualified psychologist or highly trained individual. This means that a troubled officer does not have the option to seek guidance, advice and proper referral for help from a carefully trained peer officer.

25. The recruiting plan is thoughtful but not well organized. Currently the department has Cadet, Explorer and CAPLE (Career Pathways Through Law Enforcement) programs. These are traditional programs that attract those interested in law enforcement. CAPLE is a transitional program targeting youth younger than 18 and functions like a summer camp program targeting individuals from multiple underserved school districts. The department currently conducts an open enrollment academy program at two local universities, which provides for obtaining college credit by while simultaneously fast-tracking these students into the SLCPD. The department hopes to add at least two Historically African American Colleges and Universities (HBCUs) into this exemplary open enrollment program and has made outreach to two specific HBCUs, which offers great promise.
26. The chief is well empowered to apply and enforce discipline within the agency, and there are reasonable due process safeguards to ensure fairness, including an appeal process for employees who wish to contest the chief's decision.
27. The Training Unit employs many best-practice systems for in-service training.
28. Some feel there is a bias or self-selection process in patrol assignments that tilts the assignments of African American officers to African American communities, and white officers to white areas. If true, this would be a dangerous implicit bias that could ultimately deny officers opportunities because of race. This may be a case of self-segregation because of a lack of trust and perceived (or real) cliques within the organization.

5.2 Recommendations

IMMEDIATE:

1. Create a chief of staff position within the Office of the Chief to help the chief coordinate, prioritize, and communicate the organization's mission and vision, objectives, and strategic plan, and provide strong, consistent follow-up on her behalf.
2. Facilitate an off-site workshop with the chief, FOP and ESOP to open constructive dialogue and find a collaborative path forward on the issue of race. Identify the groups' mutual interests and agree on at least one shared goal and a plan of action, such as re-designing the promotion exam for the rank of sergeant by adding more transparency and more objective scoring of candidate performance.
3. Conduct a critical analysis of the recruiting, testing, training, and hiring processes to determine whether there is a disparate impact on any group of candidates and whether the department is moving toward achieving the diversity it seeks. Resolve and redesign these processes to be more transparent. As a further act of new transparency, make data publicly available about the impact on protected classes of these processes.
4. To further promote transparency, make employee data about sworn and civilian staffing publicly available, including by rank, gender, age, race, etc. Implement a process to regularly assess and fully consider the impact on diversity and equity of decisions on promotion and special assignment.
5. Provide additional support (personnel, resources, and training) and communicate a clear mission for the Diversity & Inclusion Unit and create viable and measurable outputs. To emphasize its importance to the agency, this unit should report directly to the chief.
6. Codify policy that prohibits all forms of discrimination.
7. Develop a "diversity score card" to track milestones in department's efforts toward fair and equitable processes.
8. Commit more recruiters to recruiting full time and conduct more aggressive and creative targeting of minority paths, (e.g., historically African American colleges and universities) and create a "Recruiting for Diversity" plan to target minorities and women.
9. Create an absolute obligation among all employees to receive, record and report every allegation of misconduct and ensure that an appropriate investigation of these complaints occurs.
10. The County's Prosecuting Attorney and the US Attorney should be notified about every officer who is sustained in an internal investigation for "false official statements," regardless of what discipline is imposed for the offense. A review should be promptly conducted to identify any past such findings about any current employee and the details similarly shared with both prosecutors.

11. In the future, any officer who deliberately makes a false statement in an official police document or in an Internal Affairs interview should be terminated. Department policy should be amended to reflect this absolute standard and employees made aware of, and trained on the policy, accordingly.

NEAR-TERM:

1. Resolve and redesign transfer and promotion protocols to remove potential bias. Ensure objective and measurable scales and quantifiable rating systems to increase fairness and transparency. Consider employing professional testing firms to design objective, competitive processes, and consider using evaluators from outside agencies to assist, as is commonly done elsewhere.
2. Conduct quarterly executive leadership training and planning days, perhaps in conjunction with the St. Louis Metropolitan Police, for team building, education, and long-term strategic discussions.
3. As noted by former Police Commissioner Dr. LJ Punch in a letter to the chief dated July 28, 2020, the department should consider re-engaging with the Center for Policing Equity or similar professional entity to conduct a secondary audit of the agency and identify areas for improvement and an action plan to implement strategies to promote equity and inclusion. Teneo Risk agrees with this recommendation.
4. Budget permitting, consider eventually creating a Bureau of Employee Wellness, including the hiring of an in-house psychologist to support this initiative.
5. Develop an Equal Employment Opportunity (EEO) investigative process, with highly trained investigators that conduct their work separate from the internal affairs investigations conducted by the Bureau of Professional Standards. The EEO investigator(s) should report directly to the Chief or the Deputy Chief and manage complaints related to workplace bias and harassment.

LONG-TERM:

1. Create a "Chief's Advisory Council on Equity" made up of community influencers/stakeholders.
2. Conduct an enhanced level of implicit bias and cultural diversity training for background investigators and academy instructors, including an initial new round and regular refresher training on these topics.
3. Conduct in-person implicit bias/diversity and inclusion training for all officers on a regular basis. Continuously evaluate the ever-evolving and best-available national training in this arena and keep updating and strengthening this vital training accordingly.
4. Redesign the training curriculum to accommodate Use of Force training early and often throughout the Academy and adapt this training to account for any modest differences in use of force policy between participating agencies.
5. Centralize oversight of both the Field Training Instruction (FTI) program and all Community Policing initiatives to ensure continuity and quality control while they continue to operate under the auspices of precinct commanders.
6. Create a Peer Support Program in which highly trained fellow officers volunteer as trusted sounding boards and referral specialists for colleagues in crisis. Model this volunteer unit on successful programs elsewhere in the country.
7. Develop a formal mentoring/professional development process for officers along with a transparent process for attending outside training.
8. Adopt a department-wide policy for random, periodic review of body worn camera footage by supervisory personnel to ensure compliance with policies.

5.3 CULTURAL DIAGNOSTIC Part 2: Additional Findings Based on Review of Department Policies

The policies and guideposts which a police department provides for its employees are particularly important in setting and maintaining an organization's mission and values. Teneo Risk reviewed documents relating to hiring, recruitment, field training, early warning systems, equal employment, misconduct complaints, employee accountability and a full range of processes and systems that are major factors in setting today's culture within the St. Louis County Police Department. While many policies that guide the organization are properly aligned, and in some cases showcase leading practices in modern policing, Teneo Risk found several policies relating to hiring, recruiting, use of force, discipline and other areas of accountability were lagging behind best practices in the industry. This Cultural Diagnostic Section is especially important because of the inherent reputation risks if policies and procedures are not equitable, transparent, free of bias and within the norms of best-practice policing.

Among the positive findings of Teneo Risk: the Performance Evaluation Report Manual 002 includes best-practice application-based categories that are not typically seen on standard employee evaluations. Teneo Risk also noted that General Order 11-71, entitled "Guidance Program - Early Warning System," is aligned with best practices. The Guidance Program portion of the system is a gold standard and could be a model for other law enforcement agencies across the country in terms of identifying and monitoring troubled employees and returning them to a high-performance track. General Order 18-86, entitled "Crisis Intervention Team (CIT)," is an exemplary program to deal with persons suffering through a mental health crisis. It integrates highly trained police officers into every such response, provides for sensitive follow up and services referral by the department, and includes a CIT Council comprised of law enforcement officials, court officials, mental health advocates and community behavioral health providers to ensure that policy and training within the Department is maintained at a high level. Teneo Risk found this policy to be a leader in policing.

Among areas of most concern, Teneo Risk found a lack of transparency and troubling indicators in several categories, including recruiting, hiring, special assignment selection and the promotional processes. Internal and external stakeholders generally agreed that the processes surrounding these critically important employment decisions were overly subjective and perceived to be unfair. Despite repeated requests, Teneo Risk was unable to obtain basic data on the hiring process and how protected-class individuals fare in each of the screening stages (i.e., written test, medical exam, psychological exam, polygraph, background check, etc.). Similar data was not made available for how candidates have fared in the promotion process. Teneo Risk recommends that senior leadership undertake a study of this data to determine whether these core processes have a disparate impact on any one group of candidates. Given how prominent SLCPD is within the policing world, and given its very public racial divide, Teneo Risk believes SLCPD would be well served to take a hard look at these processes and consider reform.

Teneo Risk makes the following Findings and Recommendations to bring the SLCPD closer in-line with best practices and help achieve greater transparency, diversity, and accountability as cornerstones of an improved internal culture.

5.4 Findings

1. SLCPD's basic capture, use and dissemination of data related to the demographics of candidates (e.g., for hire, promotion) and candidates who fail the Academy is lacking and not in line with law enforcement best practices. Availability of such data is essential from a recruitment and planning standpoint. It is unclear whether the agency tracks such data.
2. The department is using traditional forms of advertising for recruiting. These traditional platforms are relatively successful, but the department should be making more use of digital mediums to cast a much wider and more effective net. The department's Public Information Officer (PIO) pushes out announcements via twitter, Facebook and Instagram, but this is not as effective as an integrated outreach program.
3. According to Census data, St. Louis County demographic data is 25% African American and 52% female. Based on our review of the demographic data, the department's sworn demographic make-up is approximately 10.2 % African American and 15.7% female. According to multiple department sources and information publicly available, the percentage of African American employees has not changed in the last 10 years.
4. Because the department is not tracking, nor critically reviewing, who is unsuccessful at each stage of the hiring process, it cannot adequately identify any inadvertent barriers to applicants. Several individuals interviewed by Teneo Risk

described generational gaps between new recruits and background investigators, claiming that those who conduct the background investigations are out of touch.

5. The St. Louis County and Municipal Police Academy does not capture readily accessible demographic data of recruits who fail the Academy. The department provided anecdotal information on those who fail the Academy but did not produce actual data.
6. The St. Louis County and Municipal Police Academy recruits do not receive SLCPD-specific policy training during the academy because its classes combine recruits from multiple agencies. Post-academy field training for SLCPD's new officers is focused on teaching the new officer the practical application of what was learned during the academy but is not designed as a thorough introduction to the Department's policies. The net effect of this approach is that a new recruit does not receive sufficient and comprehensive training in SLCPD-specific policies. A fundamental re-thinking of this approach is therefore needed.
7. Teneo Risk reviewed *General Order 16-45, entitled "Selection Process,"* and found several issues of concern:
 - a. The policy stipulates a height and weight requirement that could be a barrier to entry. This is not aligned with best practices for diversifying an applicant pool.
 - b. The policy stipulates a financial debt requirement which may be a barrier and disenfranchise people who have struggled because of poverty, socio-economic status, school debt, etc. The term "excessive debts" stated in the policy can be perceived as subjective. The weight standard compliance policy is incompatible with current best practices. In this policy, the performance evaluation supervisor must record employee's height and weight. If an employee is not in the stipulated range, they are to record the amount by which the employee's weight fails to meet the standard. This policy has the potential to disenfranchise certain groups of individuals
 - c. The policy outlines the "Not Best Qualified" (NBQ) review process. The department allows this NBQ designation to be used to dismiss candidates at any stage of the police officer application process without sufficient supervisory oversight. The first level supervisor, who is a sworn officer, makes the final decision about the NBQ designation, without higher-level review. Representatives from the ESOP and FOP both identified issues with the NBQ designation. The ESOP alleges that NBQ process has a disparate and discriminatory impact on minority candidates.
 - d. The policy in *Section "I. Personal Data"* asks applicants who they know at SLCPD and to list their names. Several current and former employees, and Teneo Risk's evaluators, question the validity of this inquiry and the importance placed upon the question.
 - e. The policy has questions in *Section "VII. Military Status"* that should be examined and reformed.
 - f. The policy has questions in *Section "VIII. Financial Status"* asking about the salary of an applicant's spouse, which is not considered a best practice.
 - g. The policy in *Section "I. Personal Data"* requests a physical description of applicants. This is not a best practice in police recruiting.
 - h. The equal employment statement in the policy does not include an affirmative statement prohibiting discrimination based on sexual orientation. This appears to be an oversight that is easily corrected, as other policies affirm the SLCPD's commitment to this standard.
8. The promotion process is a divisive topic within SLCPD, subject to much criticism from the FOP and ESOP. Without additional safeguards to add transparency and objectivity, *General Order 17-44, "Promotional Policy,"* will continue to feed the ongoing accusation/narrative of discrimination based on race and gender.
9. Teneo Risk reviewed the *Field Training and Evaluation Program Manual - M004* and found the following:
 - a. The process for becoming a Field Training Instructor (FTI), one of the most important positions in setting the culture of any police agency, is inadequate. The minimum requirements to become an FTI is just two years as an officer and one year with SLCPD. Training new officers is a highly consequential area, and the current FTI requirements are insufficient for the level of responsibility they must assume.
 - b. Field Training is the responsibility of the Precinct Commanders. There is inconsistency in the FTI program because the Precinct Commanders are making decisions in isolation. Because there is no overall person/unit/structure in place to manage all aspects of the Field Training Program, there is a high likelihood

-
- that there is significant inconsistency in how new officers are trained and evaluated in each of the various precincts.
- c. Recruit officers attending the academy have little to no exposure to precincts and captains before graduation and being assigned to a precinct, which inhibits an understanding of the nuances and differences from precinct to precinct and community and community.
 - d. The patrol task areas during the phases are typical for learning practical application of policy. Officers are assigned to the same precincts during Phases I, II, and IV. Officers are assigned to a different precinct for Phase III. The department has a Probation Review Board that evaluates performance in Phase V and makes recommendations to the chief regarding the disposition of the probationary officer.
 - e. There are four phases of a new officer's total of 15 weeks of training, which is typical for field training. The policy includes a 37-week probationary period called "Phase V." This is a typical probationary period for a new officer. Overall, this portion of the Field Training policy is aligned to best practices in the industry.
10. The lieutenant in charge of In-Service Training is not receiving substantive direction from senior staff regarding what training topics to cover during annual in-service training and is largely using his own discretion to set the yearly training agenda. There is no budget for in-service or additional training options. These deficiencies constitute potential weaknesses for the department.
 11. Teneo Risk reviewed *General Order 19-070, entitled "Assignments and Succession Planning,"* and found the following:
 - a. The process of selection for special assignments is a lightning-rod issue for employees because of the desirability of these opportunities, the natural need for management to exercise some subjectivity in choosing among candidates, and the heated debate within the department about race and gender equity. Teneo Risk heard feedback from many members that unfairness in selection for special assignment is one of the most significant factors driving the perception that women and people of color are discriminated against within the department. Given these concerns, the policy needs an up-front explicit statement rejecting discrimination or any implicit bias in selection.
 - b. Teneo Risk found that opportunities for special assignment are not regularly posted.
 - c. The perception that the process of selection for special assignment is not fair is common, and anecdotal evidence and interviews suggest that the department lacks diversity at the detective and supervisory levels.
 - d. Specialized positions do not have term limits based on the specialty of the assignment, nor is there a rotation policy. Some units have members who have developed highly specialized skills over time, and it is understandable that the department would be reluctant to arbitrarily rotate such personnel. Whether an individual has experience outside of patrol is assessed in promotional decisions. This is seen as unfair to those competing for promotion who have not been given an opportunity to have a specialized position. There is a belief among interviewees - and anecdotal evidence - that certain special assignments (e.g. tactical operations) have traditionally led to fast-tracking for promotion to the disadvantage of protected class individuals who have not had access to those special assignments.
 12. *General Order 040, entitled "Awards Program,"* has not been updated since 2011. The policy states awards are to be bestowed "regularly." Department stakeholders told Teneo Risk that awards have not been given for some time.
 13. *General Order 03-61, entitled "Workplace Harassment,"* was last issued in 2003 and is significantly outdated. SLCPD has no specialized Equal Employment Opportunity investigative process to address workplace bias, harassment, and discrimination. The absence of highly trained investigators to conduct this work - separate and apart from Bureau of Professional Responsibility (aka Internal Affairs) process and reporting directly to the chief - does not meet best practices and is a critically needed reform. Among its problems, the current policy provides that complainants are directed in the first instance to their chain of command to report victimization, which is not aligned to best practices,
 14. *The Use of Force policy, General Order 10-29,* was last updated in 2010 and fails to account for many reforms in the profession in the past 10 years. Examples of the need to update this policy include that it proposes to but does not actually ban shooting at vehicles - a core best practice. It lacks necessary language limiting the use of electronic

conductivity weapons (e.g., Tasers) to only those circumstances consistent with current best practices, and it has language on shooting at fleeing felons, banning chokeholds and only allowing "necessary" force that should be made more explicit and consistent with current enlightened best thinking in the industry.

15. *General Order 04-005, entitled "Complaint Review Procedure,"* is the critically important policy that governs how complaints of misconduct against police officers and civilian employees are handled. It was last updated in 2004. It is out of date and substandard by current measures of best practices in policing. Among the concerns Teneo Risk identified:
 - a. The policy lacks an absolute rule that all complaints must be investigated. A supervisor can field a complaint from a citizen, deem it unworthy of follow up, and simply decline to forward the complaint to the Bureau of Professional Responsibility (i.e., Internal Affairs). The department must make a comprehensive record and investigate every complaint at least to some degree, with a record of steps taken.
 - b. Anonymous complaints, which in policing are sometimes the first indicator of a misconduct problem, need to be treated as if they may have merit. They are always worthy of at least some evaluation and follow up. Under existing policy, such complaints can and most likely will be dismissed outright and ignored, without any record preserved of the department's notice of the complaint.
16. *General Order 17-15, entitled "Secondary Employment,"* which is the policy governing the circumstances under which SLCPD officers provide uniformed security for private employers, is not consistent with best practices. Among its deficiencies, are the following:
 - a. The policy is missing requirements for the department to investigate and vet private employers for conflicts with department interests or criminal records;
 - b. There is no wage setting in the policy, implying that officers broker their own pay rates, which could lead to widely disparate wages for the same work and conflict among fellow officers competing for the same work;
 - c. There is no electronic tracking of work performed/not performed and no apparent supervisory personnel assigned to monitor whether the behavior of employees is consistent with policy or that employers are valid, appropriate entities for SLCPD employees with which to do business;
 - d. There is no mechanism to confirm whether employees pay income tax on income earned from secondary employment, an issue which the IRS has been known to pursue with local municipalities for resolution, despite the claim that only the individual officer is responsible for his/her taxes.
17. The *Conduct and Discipline Rules and Procedures Manual* is dated from 2007, and while it has many important features and a reasonable process to ensure accountability of employees, it is antiquated and fails to meet the demands of a contemporary police agency. Best practices covered in the policy include:
 - a. Conviction of felony or misdemeanor of moral turpitude results in automatic termination;
 - b. Suspension without pay is permissible when an employee is charged with a felony or a misdemeanor of moral turpitude;
 - c. The chief may suspend someone with pay at his/her discretion when the employee is under investigation;
 - d. The chief's decision on formal discipline is appealable to the County Board of Police Commissioners, but it allows such an appeal even for relatively minor penalties imposed by the chief, such as written reprimand, oral reprimand and remedial training. The ability of an employee to appeal relatively minor decisions to Board can serve to undermine the chief's authority unnecessarily.
 - e. The policy's failure to make "false official statement" an automatic termination offense is outside the norm, with the potential consequence that an employee sustained for this offense and kept in office will someday be deemed to lack credibility in his/her testimony before a jury. This could have a devastating impact on achieving justice for a crime victim and his/her family, as well as undermine public trust in the department.
18. Teneo Risk evaluated the Collective Bargaining Agreements (CBAs) for the various employee groups, all represented by the Fraternal Order of Police (FOP). Some findings are as follows:
 - a. The Collective Bargaining Agreements for civilian personnel, police officers and sergeants provide for reasonable employee rights and protections and are generally strong on management rights.

-
- b. There is grievance procedure language in these contracts that might be interpreted to allow for the FOP to contest policy changes made by the chief and make such changes subject to negotiations in the future. This is counter to the accepted understanding and practice of the agency that the chief sets policy, with the approval of the County Board of Police Commissioners.
 - c. The CBAs have language that creates a deliberate lack of transparency regarding the release of officers' information in response to public records requests or in critical incidents. These are a hindrance to the full transparency expected of police agencies in the current era.
 19. *General Order 06-91, entitled "Employee Assistance Program (EAP),"* provides for a reasonable level of support for employees and their families. Supervisors may make voluntary or mandatory referrals of an employee to the EAP. Mandatory referrals invoke a formal process and proper tracking under the Guidance Program. The department confers confidentiality on employees' discussions with EAP counselors but is entitled to know whether an employee is following any recommended EAP treatment or remedial plan. The EAP Plan could be improved by adding total, cost-free in-patient alcohol, drugs and gambling addiction treatment for cooperating and committed employees and employment protection guarantees for those who stick to all elements of the program. The policy dates from 2006 and should be revisited and updated to reflect best current thinking and practices.
 20. *General Order 17-112, Employee Wellness and Peer Support Program,* has several notable weaknesses. According to representatives of the FOP, the peer support counseling function exists in name only, with no real, functioning peer support program. To the extent the policy does function to aid the agency, it is focused on Critical Incident Stress Debriefings, which is very important, given the traumatic experiences that officers encounter in police work. However, the policy does not appear to emphasize or support the role of peer support counselors in helping employees who experience crisis from day-to-day stresses of policing resulting in marital stress, financial stress, alcohol abuse, gambling or other aberrant or addictive behavior. There is no provision for a psychologist/clinical professional to advise the peer support officers who, no matter how well-trained, occasionally require confidential access to professionals to navigate how best to advise a fellow officer.
 21. *General Order 16-81, entitled "Bias-Free Policing and Traffic Stop Information,"* is focused on traffic stops alone as a measure of the department's effort to address bias-free policing. This focus is much too narrow and could potentially send a message to officers that the department's concerns for bias in policing are limited to officer behavior during traffic stops. Narrowing the focus of this topic in this way can be harmful and does not meet national best practices.
 22. *General Order 4-19, entitled "Centralized Personnel Record File,"* a 2004 policy, allows for the removal of a disciplinary matter from an employee's file after three years. Best practices in contemporary policing require transparency around the discipline of police officers. Allowing removal of a disciplinary matter from an employee's file is inconsistent with best practices, counter to notions of transparency, and could cause mistrust and potential embarrassment for the agency.
 23. *General Order 13-55, entitled "Drug and Alcohol Testing Program,"* is a reasonable policy for governing employee behavior through drug testing. It includes:
 - a. An employee's duty to notify the department when taking and when ending use of prescription narcotics;
 - b. An affirmative duty for employees to report on any other employee's use or possession of illegal drugs;
 - c. Penalties up to termination for failing a drug test or refusing to take a drug test;
 - d. A policy that an employee, only one time, may step forward and admit to an addiction, including narcotics, and to rehabilitation treatment;
 - e. Providing for required drug testing if an employee is involved in a vehicle accident with fatality or critical injury, or where there was a serious on-duty injury to another person;
 - f. Providing for a reasonable process of random and reasonable suspicion testing with appropriate safeguards for employee rights;

- g. The policy is not clear on when testing is by blood or urinalysis, which is problematic in that urinalysis is not accurate for measuring alcohol intoxication or how long in the past the alcohol was consumed by the employee;
 - h. The policy does not specify what substances are tested for and by what process, which is a departure from what many police departments specify in their written policies.
24. *General Order 18-111, entitled "Recording Police Activity,"* governs conduct when being recorded by members of the public and recognizes the First Amendment right of persons to record police officers. This policy ensures proper best practices by police to prevent blocking or interfering with someone recording officers and respects rights of those videotaping/recording. Additionally, the policy allows for legitimate police action when recorders interfere/break the law.
 25. The *Strategic Plan 2018-2022* does not feature a SWOT analysis to define the department's strengths, weaknesses, opportunities and threats, and it does not address the political or media environment – which can both have positive and adverse effects on any department's success in attaining the goals outlined in the strategic plan. The plan outlines the overarching goals of reducing crime, increasing accountability and organizational capacity, and leveraging technology. Each goal is supplemented by several strategies. The strategies are well-defined and specific but lack hard and detailed tactics, including timelines and budget line-items for accountability purposes.
 26. Teneo Risk found that the Missouri Police Officer Standards and Training (POST) requirements for academy entry are objective and typical for new law enforcement officers.
 27. The St. Louis County and Municipal Police Academy exceeds the state mandate for required hours for training. The lieutenant who runs the Academy recently changed the learning style of recruits, shifting from boot camp methods to more hands-on, scenario-based learning, a very positive development.
 28. Currently, the state determines pass rates on the final exam, as well as on firearms and physical/defensive tactics training.
 29. In-Service Training for experienced officers exceeds the state mandated hours of 24 hours per year. SLCPD requires 50-55 hours per year and is moving to more scenario-based learning versus the classroom lecture style they have in place currently. This approach and commitment to this level of training is consistent with best practices.
 30. *General Order 18-86, entitled "Crisis Intervention Team (CIT),"* is a new policy which was updated on October 14, 2020. It is an exemplary program to deal with persons suffering through mental health crises, providing for highly-trained police officers to respond to such calls, for follow up and services referrals, and for training and policy oversight by a CIT Council comprised of law enforcement officials, court officials, mental health advocates, and community behavioral health providers.
 31. Teneo Risk reviewed the *Performance Evaluation Report Manual 002* and found the following:
 - a. The policy outlines a typical system for evaluating employee performance. Employees are evaluated every six months based on their hiring anniversary date. Once an employee reaches the top of the pay range, evaluations convert to annually. There are also periodic evaluations for employees whose performance is deemed unsatisfactory.
 - b. The policy includes application-based categories not typically seen on standard employee evaluations but are best practice for law enforcement. Examples of these categories include "Application of Fair and Impartial Policing," "De-escalation Techniques" and "Community Engagement Effectiveness." The performance ratings are typical: "N-Not Satisfactory," "M-Meets Standards," and "E-Exceeds Standards." There are also detailed descriptions for each evaluation category and explanations as to what is required in each category to achieve the rating. This policy is aligned to best practices.
 - c. Supervisors' evaluations have additional categories that are typical to evaluating their supervisory effectiveness, therefore aligning this policy to best practices.
 - d. Employees can respond to and appeal evaluations. Employees are permitted to appeal to the Performance Review Board if they have one or more ratings below "Meets Standards." The chief makes the final decision on the appeal of the evaluation. This policy is aligned to best practices.
 32. Teneo Risk reviewed *General Order 11-71, entitled "Guidance Program - Early Warning System,"* and found the department is utilizing IA Pro software for the formalized process of identifying employees with an established pattern

of behavior that is inconsistent with professional police conduct or established police procedures. The guidance program lasts one year and can be initiated by triggers set in the system itself or by a single incident. The program is managed by the Internal Affairs/Bureau of Professional Responsibility (BPR). The watch commander of the employee provides quarterly reports to BPR while the employee is in the program. All information is maintained by BPR. This policy is aligned with best practices.

33. *General Order 17-25, "Grievance Procedure,"* is a reasonable procedure for an employee grievance to be heard regarding workplace issues and how resolutions are attained, with the employee entitled to a hearing before a committee of fellow employees. Internal investigation processes reasonably protect employee rights, including representation by the FOP and an attorney during professional standards interviews, with the employee also having reasonable access to investigative materials. There is no significant relinquishment of management rights to hold officers accountable, and this is a leading policy that tends to follow best practices.

5.5 Recommendations

IMMEDIATE:

1. Provide additional transparency both internally and externally regarding recruiting, hiring and promotional demographics. The department should have readily available, and publicly accessible data on all aspects of these processes. This will allow the department to create a strategic plan to better address recruiting and hiring to reflect the St. Louis County community.
2. Engage the FOP and ESOP as partners in a full re-envisioning of the promotion process for sergeant and lieutenant. Hire a professional testing company skilled in test design and in ensuring objectivity in scoring the performance of candidates, including using unbiased outside assessors. Create ranked scoring for written and oral portions of exams.

Note: The chief advised Teneo Risk that the department has used outside test designers in the past – and even panels of outsiders to evaluate candidate performance - but that the process was not satisfactory in her opinion. Despite this view, a radical change is needed in how the department conducts tests for promotion. Validated, objective tests designed and conducted by outside professionals is a commonly accepted best practice in police promotional processes. Teneo Risk strongly recommends that this approach be given a second look by the department and that the FOP, ESOP and other stakeholders are invited to provide input in how these tests are designed.

3. Require the chief to relinquish his/her total discretion to choose who gets promoted from an eligibility list and instead afford some reasonable advantage to a candidate's rank on the test (i.e., by adding a "one in three" or "one in five" rule that requires the chief to select from among the top persons on a ranked list of candidates who have passed the test).
4. Require a college degree as a condition for advancement to the rank of captain or above. Consider requiring certain levels of college credits for appointment to sergeant and lieutenant. Adopt an aggressive program to encourage continuing education for those members who have not yet achieved a degree. Efforts should include finding colleges and universities willing to provide online and live classes (including in SLCPD facilities) that are scheduled in a manner sensitive to the special demands and shift work of police officers.
5. Remove height and weight requirements in *General Order 16-45, "Selection Process."* This could be a barrier for entry and hinders being able to diversify the applicant pool.
6. In lieu of height, weight and other purported fitness requirements for hire, create a validated "job functions test." Such a test, used by other agencies, measures a candidate's ability to perform what are deemed to be typical and "essential" job physical tasks which a typical police officer may have to perform, such as dragging a human dummy a certain distance, climbing a fence, crawling through a confined space, etc. Hire a professional consulting firm familiar with such testing to help design a fully validated and defensible test of this nature.

7. Modify the financial/debt requirement in General Order 16-45, "Selection Process." to make clear that the debt of a spouse, significant school debt and other considerations of this nature are not a barrier to being hired as a police officer.
8. Modify *General Order 16-45* to require that any NBQ designation be approved by a senior commander at the bureau level.
9. Modify *General Order 16-45* by deleting Question G on the Personal History Questionnaire (PHQ), which asks applicants who they know at SLCPD and to list their names.
10. Modify *General Order 16-45* in Section "VII. Military Status" by revising questions pertaining to military commitment.
11. Modify *General Order 16-45* in Section "VIII. Financial Status" by deleting the question regarding spouse's salary.
12. Modify *General Order 16-45* in Section "I. Personal Data" by removing the request for a physical description of the applicant, as it is not best practices.
13. The St. Louis County and Municipal Police Academy should capture demographic information on applicants who fail in the academy and the areas where they are falling out. Further, the SCLPD should undertake a comprehensive effort to analyze why these failures are occurring and take appropriate steps to address potential disparate impacts and make appropriate adjustments to its training and evaluation processes.
14. The Academy should adjust its schedule so that SLCPD recruits are afforded an opportunity to do a modest number of ride-alongs with patrol officers during their academy training so that they can begin to get exposure to the vast diversity of St. Louis County and the nature of basic patrol work. This early introduction will give valuable context to the recruit trainees' classroom training.
15. Modify *General Order 16-45* to add sexual orientation to the equal employment statement of prohibited considerations.
16. Institute the appropriate safeguards to ensure that Final Review Boards guard against bias in hiring. Consider instituting a scoring and ranking system to evaluate relative worthiness of candidates in a bias-free manner.
17. Seek legal counsel to review the legality and appropriateness of *General Order 54, "Weight Standard."*
18. Create an Equal Employment Opportunity investigative process that is separate and apart from traditional internal affairs investigation procedures. This new investigative entity, which could be modest in size (e.g., perhaps one or two investigators), should report directly to the chief and have access to County's legal and human resources experts. The investigators should be extensively trained and be continually updated on how best to conduct these special kinds of investigations. These investigators should be highly accessible within the agency and should, as a matter of their regular duties, conduct department-wide training on EEO issues.
19. Undertake a complete review and rewriting of the Use of Force policy, taking into consideration the many positive developments and progress in the profession in last 10 years. Among the issues that should be addressed are:
 - a. The fleeing felon language should be narrowed.
 - b. The language on banning chokeholds must be rewritten to be more specific.
 - c. SLCPD should reach agreement with another qualified agency to investigate its officer-involved shootings, in-custody deaths, and other critical incidents, consistent with the enlightened national trend toward police transparency and accountability.
 - d. The language prohibiting shooting at moving vehicles should be revised to make explicitly clear that the only justification permissible is when a person in the offending vehicle is using deadly force against the officer or another by means other than the vehicle (e.g., offender is shooting from the vehicle).
 - e. The confusing examples in the policy that direct when use of force is justified and not justified should be removed
 - f. A new section should be added that explicitly discusses the limitations on use of electronic conductivity weapons (e.g., Tasers) to only those circumstances that are consistent with current best practices.
20. Undertake a complete review and rewriting of *General Order 04-5, "Process for Investigating Complaints Against Members,"* as it is outdated. Codify an obligation to refer all allegations of misconduct of department employees to the Bureau of Professional Responsibility (BPR). Ensure that a supervisor, either at the command level or within the BPR, investigates and creates a record of how every citizen complaint is handled. If the evidence shows the complaint is without merit, this can be documented quickly and with minimal effort, but there must be a record preserved of such.

-
21. Conduct a complete review of *General Order 16-81, "Bias-Free Policing and Traffic Stop Information,"* and rewrite this policy to correct its current limited focus on traffic stop activity. The policy should be modified to include and emphasize broader policy direction to officers about the need and commitment of the department to bias-free policing in all its operations and to countering inherent bias. Engage and take input from the public in the process of rewriting this policy.
 22. Eliminate language that allows for removal of a record of a disciplinary event after three years in *General Order 4-19, "Centralized Personnel Record File."*

NEAR- TERM:

1. Develop a one- to three-year strategic plan for recruiting for diversity.
2. Establish a wider and more intentional digital footprint when it comes to recruiting. To attract a more diverse pool of officers, the department should expand its reach to target specific audiences with their recruiting message. A nominal investment could go a long way in targeting a new generation of officers.
3. The department should set recruiting goals that reflect the community. This is an industry standard to ensure the department is as diverse as the community it serves. The strategic plan should include an emphasis on engaging the of leadership in communities of color to assist in achieving full diversity.
4. Provide more transparency both internally and externally regarding hiring demographics. The department should convene a committee of senior ranking members to conduct a critical analysis of what has happened to protected class individuals at each stage of the hiring process in the past several years and then make recommendations accordingly to improve the process. The panel should consider taking input from outside experts in human resources, professional testing and diversity recruiting during the process.
5. Create a yearly disparate impact report to be placed on the agency's website for better transparency, accountability, and actionable information for internal use about the process.
6. In *General Order 16-45, "Selection Process,"* interview questions should be added to include behavioral-based questions to ensure the right fit for the department. The County's best human resources experts should be consulted – and a professional outside consultant as well if needed –to design this element of screening to be as fair, reasonable and perceptive as possible.
7. Per *General Order 19-070, "Assignments and Succession Planning,"* create an objective selection process for all specialized units, inclusive of posting the announcement of vacancies to the entire department, to include the qualifications sought and the process to apply. Additionally, conduct interview panels consisting of a supervisor from the specialized unit and other mid-level supervisors from other units in the police department. Ensure the selection panel is diverse and develop objective criteria for evaluating candidates for the positions. While the chief and senior command must retain discretion to make these selections, there should be a strong presumption by leadership that the candidates who fare best in the overall selection process are regularly chosen for special assignment.
8. Consider an annual "career development" assessment process for every employee in a specialized assignment and add such a process to *General Order 19-70, "Assignments and Succession Planning."* This process should work as follows: The chief and senior leadership should conduct an annual review of the performance of every member in the ranks of officer, detective, sergeant and lieutenant in every assignment other than regular road patrol. A panel of senior commanders, perhaps including even the chief and/or deputy chief, should be convened once a year to hear presentations by supervisors of every special assignment unit in which each employee's past year's performance and career arc are fully discussed. This should be done to: 1) ensure regular movement into and out of these special assignments 2) create ample opportunity for patrol personnel to diversify their careers by moving into open slots in special assignments 3) require supervisors to justify to senior command how their units are performing and how well each individual subordinate is performing in the unit and 4) have the chief and senior commanders evaluate whether each individual in a special assignment is worthy of another year in the position. Given that assignment to a special unit is a privilege and not a right, employees who are deemed by the panel to have failed to perform at an acceptable level should be rotated out of the assignment and others given the chance to fill the newly created vacancy.

9. Re-evaluate the *Field Training and Evaluation Program Manual - M004* and the selection process to become a Field Training Instructor (FTI). Create a selection process to include interview panels.
10. Re-establish the role of senior command in setting the in-service training curriculum each year. The Executive Command Training Committee should fulfill its role of setting the in-service training curriculum each year based on management's most important priorities and mandates for the organization.
11. Expand the umbrella in *General Order 18-86, "Crisis Intervention"* to include people with developmental disabilities as part of the policy. Developmental disabilities such as Autism, ADHD, ID (Intellectual Disabilities) can mimic the characteristics of mental illness when the person is in crisis.
12. Update *General Order 040, "Awards Program,"* to reflect current best practices in bestowing awards.
13. Clarify when urinalysis versus blood testing is used in *General Order 13-55, "Drug and Alcohol Testing Program."* Consider adding specificity to testing, for example for which substances and by what processes.
14. Rewrite *General Order 17-15, "Secondary Employment,"* to create true administrative oversight and to protect the agency from potential embarrassment and malfeasance. Obtain software (now free from some vendors, with cost pushed to the secondary employer) to track the entire program activity.

LONG -TERM:

1. The St. Louis County and Municipal Police Academy should implement a Phase II training segment, taught at the Academy for SLCPD recruit officers, that focuses on covering all of the essential "need to know" department policies for new recruits.
2. Field Training should be managed by the Training Division and not made the responsibility of the Precinct Commanders. Precinct commanders, supervisors and assigned Field Training Instructors must still perform their training, mentoring and supervisory roles but will need to carefully coordinate their evaluation processes with the Training Division to ensure continuity of the FTI program across the entire department.
3. Create a multi-year strategic plan for in-service training.
4. Add cost-free, in-patient alcohol/drug/gambling addiction treatment for cooperating and committed employees and employment protection guarantees for those who stick to all elements of the program in *General Order 06-91, "Employee Assistance Program."* The policy dates from 2006 and should be revisited and updated to reflect current best practices.
5. Revise *General Order 17-112, "Employee Wellness and Peer Support Program,"* and revise the peer support program by fully supporting a broader role for peer support counselors to be sounding boards and trained in referrals to help relieve stress of the everyday elements of policing. Support a new vision of peer support by employing a police psychologist to serve as the trainer and on-call advisor to peer support volunteers when they have a need to consult a clinical professional.
6. Update the *Strategic Plan 2018-2022* with tangible tactics, timelines, and budget line-items included, along with measurable output performance metrics, and put in place a method to conduct a true internal and external satisfaction survey and index to measure outcomes.

6 CRIME CONTROL STRATEGIES

The County has unique challenges in the management of its crime control strategies. County police are balancing relationships, politics, and myriad boundary issues with the various municipal law enforcement agencies that make up the County. At the same time, it is providing full-service public safety in 17 municipalities and the unincorporated portions of the County, as well as various other public safety services, from School Resource Officers to Communications and Computer Aided Dispatch (CAD) services to more than 35 others.

The policing model in the County is complex. The SLCPD serves large swaths of unincorporated areas of the County. As for these municipalities policed by the SLCPD, they are technically always “fully staffed” at the level of officers required by each contract, but Teneo Risk found that there is typically a greater need for police services. Our initial finding is that the contracts are very lean on basic patrol services and that SLCPD must surge extra resources to those areas with some frequency.

There are also a number of municipalities with their own police departments, some of which are large, sophisticated, and capable of handling nearly all police functions independent of SLCPD. The smaller agencies rely on the County for nearly all services beyond routine patrol work. A universal theme expressed by leadership of these agencies is that SLCPD is a strong partner delivering quality service in support of these agencies when asked to do so. Teneo Risk found that the SLCPD is well respected by its partner law enforcement agencies throughout the County.

6.1 Findings

1. The department does not have a coordinated agency-wide methodology to reduce crime. While precinct commanders are properly empowered to lead the crime fight, there is no overall planning, coordination, or strategic deployment of resources to assist them.
2. There is no CompStat-like process or structured dialogue about strategically addressing crime. The department is not combating crime by taking full advantage of the four principles of CompStat: accurate and timely intelligence, effective tactics, rapid deployment, and relentless follow-up.
3. The SLCPD does not study specific crime-trend information in useful, immediate blocks of time (e.g., 7-day, 28-day and Year -To -Date (YTD) trends); and comparing them to the same time periods from the previous year in an effort to gauge the effectiveness of crime reduction strategies. By not tracking specific crimes (e.g., robberies, burglaries, shootings, etc.) in these short and intermediate time frames, commanders are left without sufficient information to assess whether a particular strategy or initiative is actually effective to reduce crime.
4. There is no existing structure for the SLCPD and the SLMPD to formally and regularly collaborate in reducing crime. While individual relationships between command and rank-and-file members in the County and City are positive, there is no concerted formal effort to strategically combat spill-over crime.
5. The sharing of information and intelligence between SLCPD and SLMPD is nearly always carried out informally and is based on strong relationships that individual officers, detectives, supervisors and commanders have with their counterparts in the other agency.
6. SLMPD's Real Time Crime Center (RTCC) is admired for its capabilities. Most believe the RTCC should be a better-shared resource between the two agencies but that political and community influences have prevented such collaboration in the past.
7. Weekly crime analysis reports can be improved to provide more actionable intelligence to precinct commanders.
8. There is no proactive strategy to remove from the streets firearms that are illegally possessed.
9. There is no coordinated holistic gang strategy, combining enforcement, investigations, intelligence gathering, and intervention. There is no collaborative effort with broader law enforcement, including the Division of Probation and Parole, to gather and maintain intelligence on known gang members.
10. There is no commander or unit in the department who is specifically charged with arresting the most prolific and predatory criminals, including those wanted on warrants. Efforts in this regard are diffused among several units, leading to a fragmented approach and to some immediately arrestable criminals remaining on the street and capable of reoffending.

11. Self-initiated anti-crime efforts by the Special Response Unit are not always communicated to precinct commanders in a timely manner.
12. The County's RMS system is an in-house developed system shared by many agencies in Missouri, but not by the City of St. Louis. As a proprietary system, it is reliant on people, not process. "Off-the-shelf" systems have no such parameters, and although the SLCPD's system is well-loved by the user agencies, the Teneo Risk team believes it important to 'red flag' this issue.
13. There is no central repository for crime intelligence. Siloed information inevitably leads to information "falling between the cracks," an overall lack of coordination for what could be case-solving leads, and duplication of effort.
14. If the nationally mandated change in crime reporting from UCR to NIBRS is not well communicated before it occurs at the end of 2020, it will result in significant confusion for elected officials, the media, and the community. This also may result in accusations of statistics tampering, since the NIBRS method counts victims of crime as opposed to the UCR method, which tallies incidents.
15. The overall staffing model for cities that contract for policing from SLCPD requires further study.

6.2 Recommendations

IMMEDIATE:

1. Implement regular crime meetings using a CompStat or similar methodology, chaired by the chief, that include crime-reduction accountability goals and measures for commanders.
2. While the St. Louis region continues to struggle with high rates of violent crime, data analysis indicates that there are particularly high concentrations of crime in certain areas in both the City and the County, and most specifically along a corridor defined by a 3-mile border between the 8th Precinct in St. Louis County mostly within the City of Jennings and the 6th District in the City of St. Louis, which includes the Walnut Park West and North Pointe neighborhoods. This border area of the City and County suffers from some of the most significant violent crime in the St. Louis region. It therefore offers an ideal opportunity for a new collaborative crime-fighting effort for SLCPD and SLMPD, local prosecutors and their federal law enforcement partners. This border crime is shared by both SLMPD and SLCPD, and so, too, must be their response. A smart, targeted policing initiative, developed and implemented jointly by SLMPD and SLCPD, will drive down crime and demonstrate to the region's stakeholders that good policing matters. It is our recommendation to pilot a 120-day crime reduction and community engagement initiative along the 3-mile border area noted above. The purpose for a 120-day initiative would be to launch, assess outcomes and successes during the period, and build a model of partnership that can be used in other neighborhoods in the region for the benefit of the community.
3. To better aid commanders in their deployment decisions to address immediate and emerging crime trends, redesign crime reports to provide up-to-date information on all Part 1 crimes in 7-day, 28-day, and Year-to-Date formats. Include similar trend analysis of additional specific measures of extreme violence (e.g., non-fatal shooting incidents, shooting victims, car-jackings, etc.) Develop pin-mapping and heat-map visual analyses to further aid decision makers, as well as any other actionable intelligence useful to precinct commanders and senior command staff.
4. Fully share intelligence and crime analysis with the SLMPD and collaborate with, and fully leverage, the combined resources of the SLMPD's Real Time Crime Center (RTCC) and the SLCPD's new Regional Information and Intelligence Center (RIIC), including co-locating personnel in the other's center and arranging for full intelligence, data and video image sharing between these two centers.
5. Create a Fugitive Apprehension Unit charged with locating and arresting the most prolific and predatory criminals, including those wanted on active warrants and those immediate arrestable for violent crimes based on investigative findings and probable cause.
6. Precincts with higher violence should constantly be focusing efforts on the top 10 most violent offenders known to frequent the area, including those who are currently not incarcerated and those "soon to get out" of jail or prison. This precision policing tactic can be aligned to the most serious issues within a precinct, be it known robbers, car thieves, burglars, organized retail theft crews, etc.

-
7. Assign crime analysts directly to the two Homicide/Robbery/Sexual Assault squads as part of a pilot program. Determine whether these added resources have an outsized, positive impact on these squads' efficiency.

NEAR-TERM:

1. Officially assign all shootings (fatal and non-fatal) to the Crimes Against Persons Unit. A detective should be assigned to each shooting. Precinct personnel who handle shooting incidents involving identified suspects who are still at large should not be tasked with finding and apprehending them.
2. Patrol and investigative units should share intelligence regarding fraud indicators such as fake credit cards, bank account numbers, debit cards, ATM receipts, equipment for credit card production or check production obtained from arrestees or search warrants. They should request fraud detectives' assistance whenever possible when encountering this kind of evidence.
3. Detectives involved in gang and drug cases should formally coordinate with the financial crimes detectives to investigate suspects for potential financial crimes. These investigators can leverage the full resources of the Financial Crimes Enforcement Network (FINCEN) and the financial fraud expertise and resources of partner federal agencies.
4. Redefine the mission of the Special Response Unit (SRU), which is the department's most flexible and immediately responsive unit for fighting violent crime. SRU should be tasked solely with assisting precincts with crime spikes and addressing crime patterns and trends.
5. Significantly increase staffing for SRU and create a fourth SRU team to ensure seven-day-a-week coverage.
6. In cooperation with the SLMPD, track recovered stolen autos. Identify locations where the most cars are being dumped. Use technology (LPR's, PTZ cameras, etc.) in this effort. Make arrests of thieves as they dump stolen autos. Dust all recovered autos that were stolen forcibly for prints.
7. Develop a proactive comprehensive strategy with state and federal partners to remove illegally possessed firearms from the streets.
8. Ensure that the transition to NIBRS is well-communicated across all stakeholders to prevent invalid accusations of statistics manipulation.

LONG-TERM:

1. Create a long-term crime-fighting plan with measurable objectives and strategies to set the mission and vision for the agency, as well as to hold members accountable for the safety and security of the County.
2. Establish a formal arrestee debriefing program. All arrested persons willing to talk should be interviewed regarding current crime conditions in the area with a special emphasis on the identification and whereabouts of violent crime suspects. There should be an emphasis on gathering criminal intelligence to solve crimes, dismantle violent gangs, and better identify motives behind shootings and homicides.
3. Document and ensure appropriate personnel and units receive pertinent inmate and arrestee debriefing details.
4. Formalize operations with the Division of Probation and Parole in violent crime hot spots. If approved, accompany them at meetings and home visits.
5. Develop a comprehensive gang strategy that combines enforcement, investigations, intelligence-gathering, and intervention in a newly formed Gang Unit, whose mission is to disrupt and dismantle street gangs and dissuade young people from gang life.
6. Work with car dealerships and corporate head offices to employ strategies to help prevent autos being stolen off lots by securing key fobs when the dealership is closed.
7. Precinct commanders must create and manage meaningful community policing strategies that meet their constituents' needs and promote the overall mission and vision of the SLCPD.
8. All confidential informants registered by the SLCPD should be regularly interviewed by their handlers specifically regarding violent crime hot spots.

9. In the long-term, the agency may want to reconsider implementing proven diversion programs such as Operation Ceasefire, which offers alternatives to jail for those convicted of gun crimes including education, job training, placement, and drug and alcohol rehabilitation.
9. Incorporate existing and emerging technologies into crime reduction plans.
10. Consider tapping into resources such as the Loss Prevention Research Council (LPRC) and the National Retail Federation (NRF) for information on emerging trends in retail theft including tactics being used by Organized Retail Theft (OTR) groups. The LPRC is a highly regarded retail theft “think tank” based at the University of Florida. Most large retail outlets are members of the NRF.

7 COMMUNICATION & PUBLIC INFORMATION

With the chief being new to her heightened profile, additional communications support may be helpful.

The Teneo Risk team believes additional two-way engagement between the chief with her command staff would be helpful in better conveying her mission, vision, and direction for the department. During our interviews, Teneo heard staff say that they would like to see better communication both internally and externally from top to bottom. Some expressed that they felt left out of important decisions. The chief noted that she is a strong proponent of public communication and engagement and acknowledges the agency must dedicate more resources to public information efforts. We see an opportunity for the chief to take a stronger role as the face of the agency both internally and externally, which is a critical function for a chief, and paramount for a chief executive in policing today.

In general, the department appears to be looked upon favorably by the community. Coordination of community engagement and public information could be improved from an overall strategic perspective. Chief Barton noted she intended to combine community engagement efforts under one bureau to coordinate outreach programs, alleviate duplication across the agency, and bring continuity to the department's brand. She acknowledges the agency must dedicate more resources to public information efforts.

Teneo Risk also reviewed documentation relating to how the SLCPD communicates internally and externally, including its complaint review process, and policies and approach on dealing with social media, public information and the news media. Overall, Teneo Risk found that some of these policies are outdated or lack information and clarity.

The main finding is that the SLCPD Bureau Guidelines have not been updated to reflect current Sunshine Law provisions. Additionally, several policies should be reviewed by the County's legal team.

Teneo Risk recommends updating outdated policies as well as filling in information gaps to ensure that policies are up to date with current best practices.

By implementing the recommendations provided by Teneo Risk, the SLCPD will be in a better position to communicate efficiently internally and externally.

7.1 Findings

1. There is a need for an overall executive, internal, and external communication strategy, including direct messaging from the chief regarding her re-envisioning of the department.
2. There is a lack of executive communication flowing through all levels of the organization.
3. The chief has an opportunity to work even more closely with the Public Information Officer (PIO) in development of an executive messaging strategy.
4. The PIO is well positioned to provide communications counsel to the chief.
5. The department does not have a detailed communication strategy or crisis manual.
6. The Public Information Unit is somewhat well-resourced, but with additional personnel and equipment could create additional outreach products and services.
7. Support for officers of the SLCPD could be enhanced through additional internal communications tactics and the chief attending more incident scenes, roll calls, and internal town hall meetings with staff.
8. There is no coordinated engagement strategy or toolkit for precinct commanders to enhance their community engagement efforts.
9. There is well-founded confusion about the myriad agencies serving people of the County, and the action of one officer can affect the reputation of the SLCPD, even when the officer involved is not a member of the SLCPD.
10. Self-initiated surveys do not provide the quality statistical analysis required to establish a quantifiable baseline for measuring police satisfaction.
11. Teneo Risk did not discover instances of the department proactively releasing negative information about an officer or the department. Best practices in modern policing dictate that bad news should be released immediately, because to

do otherwise will diminish a police department's credibility and will be counter to the public's demand for transparency and accountability, which are essential to building and maintaining community trust.

12. *General Order 68, entitled "Public Info & News Media,"* was issued in 2016 and does not include sections referring to citizen journalists and who can release statistical information. Some parts of this policy are lagging.
13. *General Order 111, entitled "Recording Police Activity,"* was issued in 2018 and covers all aspects of media/public recording police activity, including the limited circumstances when they can seize a recording device. This policy is a best practice.
14. There are a number of provisions in the current Sunshine Laws that are not in the SLCPD policies. Section 610.010 has added sections dealing with mobile recording devices. Section 610.205 details the law regarding crime-scene photos and video. Section 610.150 details the law regarding 911 reports. Section 610.120 details the law regarding the keeping of criminal records, including those that have been expunged. Section 610.021(18), which lists all of the exceptions to open records, now has a section specific to terrorism stating that operational guidelines, policies and specific response plans developed, adopted, or maintained by any public agency responsible for law enforcement, public safety, first response, or public health for use in responding to or preventing any critical incident which is or appears to be terrorist in nature and which has the potential to endanger individual or public safety or health.
15. The PIO is not informed of Sunshine Law requests made by members of the media and the general public, which does not allow the unit to proactively prepare to respond to potential issues arising from the release of information.
16. The PIO is employing best-practice communication methods during critical incidents.
17. The PIO manages the department's website and uses good social media monitoring tools. The SLCPD website is a source of up-to-date information including crime mapping capabilities, department procedural documents, and annual reports.
18. The department is currently using the following digital mediums: Twitter, Facebook, YouTube, Instagram, NextDoor, and Ring Neighbors. Each precinct has an independent Facebook page in addition to the official departmental page. The PIO has a rough social media calendar with important holidays but has been planning to further flesh out a calendar to help with content creation.
19. The agency's social media sites are up-to-date, and staff engage with its more than 69,500 followers on Twitter and more than 100,000 Facebook followers and comments are overwhelmingly positive. There is an excellent balance of stories online, and information is posted to Twitter in a timely manner. The agency makes good use of short story-telling videos. Engagement is overall positive. The department's YouTube page is new, and the agency has not populated it with many videos. Their recruitment video is four years old, but is still relevant, albeit long.

7.2 Recommendations

IMMEDIATE:

1. Assist Chief Barton to create an executive messaging strategy, including messaging her vision for the department and the importance of community engagement across the County.
2. Provide the chief with executive media training and messaging strategy.
3. Sunshine Law requests from the media should be flagged to the PIO or should initially route through the PIO to the Custodian of Records to allow the department to proactively prepare to respond.
4. Implement a new policy to address when and under what circumstances body worn camera footage will be released to the public. Failure to have a strong, clear policy in place, and one that leans toward transparency and release reasonably quickly after a controversial incident occurs, could have grave consequences for the department's credibility and perception of transparency with the community.
5. Conduct both an internal employee satisfaction survey and an external police satisfaction survey to set benchmarks to measure not just outputs, but outcomes of improved communication and community engagement strategies.
6. Update *General Order 68 Public Info & News Media* to include citizen journalists and update definitions. Update who can release statistical information. An explanation of the legality of releasing mugshot photos and information regarding

media use of drones at incidents should also be included. The policy should include direction for the Custodian of Record to advise the Public Information officer (PIO) when media requests are received.

7. In *General Order 98, "Social Media & Networking,"* sections, F and G should be revised to include policies on endorsing (i.e., "liking/thumbs up") in addition to transmitting (re-posting/re-tweeting).

NEAR-TERM:

1. Create an internal communications plan to include various technological methods of communication (vlogs, SharePoint site, emails, etc.).
2. Develop an external communications plan to include actionable tactics with meaningful outcome-based metrics.
3. Support and enhance the critical work of the precinct-based Neighborhood Policing Officers (NPOs) by creating a community affairs aide in the rank of lieutenant or captain, reporting directly to the chief and charged with assisting the chief on all community-policing initiatives, This aide should be tasked with ensuring consistent messaging, policy, training, implementation and follow up of the chief's community-outreach, problem-solving, and partnership-building initiatives throughout the department in full coordination with the precinct commanders and their NPOs.
4. Each precinct should have Neighborhood or Community Engagement Officers whose sole responsibility is to build partnerships and relationships with the myriad unique neighborhoods in each precinct area.
5. Consider the addition of an FTE to the PIO to allow the lead PIO additional time to strategize, plan, and serve as communications counsel to the chief.
6. Provide space for a media room for news conferences, interviews, and video generation.
7. An update and review by legal are needed for *Bureau Procedure 11-15, "Open Records."*

LONG-TERM:

1. Implement a shadowing program where lieutenants can shadow the chief for a week to both learn more about management and better understand her vision for the agency. Consider offering this same opportunity to sergeants in the organization once the cycle of lieutenants is completed.
2. Develop a true brand image for the agency that can be carried through all programs, including recruiting, community engagement, departmental graphics, and social media.
3. Consider training one or two people at each precinct to serve as their precinct's contact with the PIO and task these individuals to provide the PIO with social media content, help with precinct Facebook content, and be available to assist the PIO at incident scenes within their jurisdictional area.
4. Create a style guide to ensure consistent and cohesive brand identification across all communication platforms.
5. Constantly review new updates to the Sunshine Law and incorporate into the Bureau Guidelines.

8 TOOLS AND TECHNOLOGY INFRASTRUCTURE & POLICY REVIEW

Tools and technology are the backbone which supports the operations of any police department. The functionality and alignment with best practices regarding this infrastructure is essential to ensuring that an agency is running efficiently. Department technologies change rapidly based on the demands of the communities they serve. The advent of social media, cloud-based software, and the explosion of digital content have left many departments racing to modernize. Decades-old technological practices in departments across the country, including dispatch systems and evidence storage practices, have been quickly surpassed by methods better-suited to the digital age.

A robust, modern tools and technology infrastructure will improve dispatch efficiency, save department funds, safeguard evidence, increase department transparency, and mitigate risk both internally and externally. Teneo Risk's analysis of the SLCPD's tools and technology systems found a series of opportunities for the department to modernize to keep up with fast-paced advancements.

Teneo Risk conducted the tools and technology review in two parts. The first part consisted of interviewing internal stakeholders to understand the different tools and technology implemented and used by the department. The second part involved reviewing policies relating to tools and technology to understand how the department regulates the use of its technology infrastructure.

In conducting interviews to better understand the technology landscape, Teneo Risk found that while certain technology is state-of-the-art and adequately funded (such as the use of force data tracking in Blue Team), several areas are lacking in funding and do not serve the needs of the department. In contemporary American policing, this is not unusual. Most larger departments at any given time are strong in certain areas, with current systems in place or in the pipeline to be upgraded and integrated into everyday operations, and some weaknesses in need of timely, even urgent attention and improvement.

Teneo Risk found that SLCPD's use of advanced facial recognition technology for mug shot analysis, which has been approved by the American Civil Liberties Union (ACLU) and Intelligence Procedures *General Order 18-117, entitled "Unmanned Aircraft Systems" (UAS)* are two examples of policies aligned with best practices.

However, the Computer-Aided Dispatch (CAD) system is 20 years old, property and evidence handling is inadequate, and the handling of detectives' interview room camera footage is not aligned to current best practices.

To remedy these issues, Teneo Risk has provided findings and recommendations below that include specific actions to solve or mitigate emerging problems within the department's technology infrastructure.

8.1 Findings

1. The Computer Aided Dispatch (CAD) system, partnered with the Regional Justice Information System (REJIS), is 20 years old and according to department stakeholders is beginning to fail. The department is looking into purchasing Motorola Solutions' CAD. Currently, the CAD does not meet the needs of the department. The initial cost to implement a new CAD is estimated at \$1.5 million. There are several other agencies in the County who rely on SLCPD's CAD system. CAD is the lifeline that operates a police department's most critical function, which is responding to calls for service. It is vitally important that this CAD upgrade occur as reasonably soon as possible and that the police department, the County and the participating colleague agencies invest the resources and commitment collaboratively to make the new CAD a success.
2. SLCPD apparently has no publicly available department-wide policy on intelligence gathering, with appropriate civil rights safeguards on data collection, when and under what circumstances to investigate individuals or groups that may be engaged in Constitutionally protected activity, setting rules on what constitutes a proper criminal predicate, etc. The best practice in policing is to have a publicly available policy and to typically provide the ACLU and other privacy groups an opportunity to weigh in and comment.
3. The Records Management System (RMS) – the basic data system that records and correlates all written reports of the agency -- has been in place since 1984 and is maintained and supported by the County Police Information Technology Department. This is a system, known as "Computer Assisted Report Entry" (CARE), was built in-house by the County, and the County continues to provide internal personnel and resources to properly maintain and upgrade it. This system

currently meets the needs of the department. Nearly every agency in the County relies on it, as well as several out-of-state users. Around 20 to 30 more locations will use it starting next month.

Note: This is a highly unusual arrangement in modern policing, having a government agency (St. Louis County) that has built and continues to maintain and update an RMS for so many regional law enforcement agencies. Teneo Risk questions whether this is sustainable long term, when so many state-of-the-art and ever-improving RMS systems with vast analytical capacity are available in the marketplace.

4. A Georgia company called Utility is the provider of body-worn camera (BWC) technology, including capture, storage, retrieval, and analysis. The BWC program was introduced into the department in 2020. Every patrol officer, SRU and tactical officer has been issued and expected to use a camera to record interactions with the public, but supervisors and detectives have not. The department uses cloud storage for BWC footage, and internal stakeholders noted that this is a current and up-to-date system. There is an audit trail that shows when another officer looks at camera footage. There is also an audit trail for looking at all data. In the RMS system, officers can pinpoint which day's footage was viewed. While BWC footage is stored in the cloud, detectives' interview room footage is not, but there is a plan underway to resolve this problem.

Note: The department's new BWC program includes a policy that is generally consistent with best practices in the industry, with two important exceptions: 1) Not enough officers who might be involved in a critical incident have been issued body cameras; and 2) There is a lack of policy guidance on when footage will be released to the public in a critical incident.

5. The SLCPD's detective interview room video technology is antiquated. Investigators use hard drive server storage, "burning" copy disks for hand delivery to prosecutors and physically store copies in detective files. Modern investigative standards and best practices involve the storing of interviews from the outset of the case to its conclusion in a cloud-based system. The current process involving the copying and transport of discs can lead to critical errors and failed prosecutions.
6. In handling property and evidence, the SLCPD is underserved in both technology and storage capacity, leaving it vulnerable to failed prosecutions, misplaced or misfiled evidence, and internal theft. A modern inventory system is needed with tools to record, store, track and retrieve property placed in its custody, with full audit trail capability and the most modern security and accountability measures, including capital investment in modern storage facility upgrades.
7. The department uses Genetec for its Automated License Plate Reader (ALPR) technology. Data is collected in Crime Matrix and stored for 30 days, a relatively short period by law enforcement standards. Such brief storage can hinder an investigation if a detective develops a lead regarding a vehicle's presence at a crime scene. If more than 30 days have elapsed, the detective would not be able to confirm the lead through ALPR.
8. The SLCPD does not track secondary employment, a significant potential liability. Without a sound policy and specific rules and prohibitions and tracking procedures, the department is left vulnerable and potentially liable, given that this type of work typically involves uniformed assignments and use of marked department vehicles. Although free products exist on the market – with costs shifted to the secondary employer - the department has no software that manages off-duty work. Each supervisor is expected to verify how many hours an officer under his/her command worked in secondary employment during the pay period. Officers are required to turn in a time slip every two weeks. Each off-duty job is an independently brokered arrangement between the officer and the employer, with the officer paid directly by the secondary employer. The net effect is that SLCPD's secondary employment system is largely run on an "honor system", which lacks real accountability. Similar programs, when run without appropriate safeguards and accountability, have resulted in malfeasance and corruption issues at departments across the country.
9. The department uses Power DMS, which is a leading software designed to maintain policies and procedures, track their amendments over time, and track each officer's participation in training to maintain his/her access to and proficiency and understanding of current policy. While Power DMS is an excellent tool, the SLCPD's policies are poorly structured, divided between General Orders, Special Orders, Bulletins and Manuals, with the bulk of guidance coming from General Orders but no sense of cohesion. This format makes it difficult for members in the field to find necessary information when needed while on duty or to study for promotional exams.

10. *General Order 11-02, entitled "Gang Investigations,"* is almost 10 years old. This policy relies on a point system to identify gang members. This process could lead to some gang members going unidentified with others being wrongfully included as gang members.
11. During several interviews with SLCPD enforcement personnel, it was evident that vehicles driven by violent offenders are routinely stopped by using so-called "Spike Strips." These devices are basically metal pointed spikes attached to a long strip and strewn across the road as the offender vehicle approaches in an effort to flatten the tires and apprehend the occupants. In addition, it is unclear if the SLCPD requires use of these tools to be documented in any way. Routine use of these tools is not in keeping with best practices regarding felony car stops because of the physical danger to officers who deploy them and the potential unforeseen consequences of a moving vehicle with flattened tires.
12. *General Order 15-43, entitled "Police Canine,"* when compared to the IACP Model Policy, is lacking in several key areas. It does not set the proper tone for this critical use of force policy. While the SLCPD covers the procurement and training of a canine, there is little mention of the selection and training of the handler. The SLCPD policy makes no mention of team qualifications and training, ensuring that the handler and the dog work efficiently as a cohesive unit. The SLCPD policy is also lacking specific guidelines for the care, treatment, and safety of the canine. The supervision and post deployment segments of the SLCPD policy are somewhat general.
13. *General Order 18-028, entitled "Evaluation - Priority Assignment of Call,"* covers the basics of 911 call prioritization. The more serious calls (homicides, robberies, rapes, bombings, serious assaults, etc.) are Priority One. Priority Two calls include non-serious crimes, nuisance offenses, etc. Priority Three are calls are those in which a delayed response does not have a negative impact. The CAD Alert Files allow for information on specific addresses to be entered into the system in order to help officers in their response; it also includes information on officer safety (e.g., violent mental health patient at location), and persons with physical disabilities/communicable disease, etc. There is no mention of 311 calls or 311-type calls (noise complaints, disorderly persons, etc.) in this policy.
14. *General Order 20-037, entitled "Case Management and Warrant Application,"* covers the basics of how cases are assigned to various investigative units. This order also provides guidance on accurate completion of Arrest Reports (F-287). In addition, the policy includes rules to be followed during custodial interrogations. Page 3/17 - III D 4 lists one of several types of incidents that are handled by the Homicide, Robbery, Sexual Assault Unit. In this case, it states that this unit will handle First Degree assaults (most likely shootings) where the participants are unknown to each other and where one of the participants is admitted. The investigations of non-fatal shootings with identified suspects are routinely assigned to Precinct personnel. This is not in keeping with best investigative practices.
15. In *General Order 17-53, entitled "Search and Seizure,"* pages 4-5 in *Section VII Warrantless Searches* lists several instances where the police do not need a search warrant e.g., inventory search, valid arrest, exigent circumstances, etc. However, point 11, "Aerial surveillance" is likely too broad. The Fourth Amendment allows police to conduct aerial surveillance without a search warrant, but "persistent" aerial surveillance is unlawful without a search warrant. Pages 6-7 in *Section IX Strip and Body Cavity Searches*, Section B, subdivision 2 states that a body cavity search may be performed without a search warrant on any person arrested for a felony charge. While there are provisions and controls later in the policy, such as requests for approval through the chain of command and the requirement that the body cavity search be conducted by health care personnel in a medical facility, this policy is too broad. As per this policy, a body cavity search can be done on any person charged with any felony.
16. The department has eight (8) square miles of valuable coverage with ShotSpotter technology and uses it well, with effective and timely patrol response occurring and the system aiding in subsequent criminal investigations. *General Order 18-072, entitled Gunshot Detection System,"* is two years old and aligned to best practices.
17. SLCPD is ahead of most agencies in terms of its use of available cameras and ALPRs to assist crime prevention and in criminal investigations. It continues to grow its capacity to place these devices in higher-crime areas where they will be most effective. The department also has some access to cameras placed by other government entities (e.g., schools, traffic agencies, etc.).
18. The department has adopted a personal computer program so that each patrol officer, sergeant and lieutenant receive a laptop. Detectives get their own laptops as well. This is a best practice that allows officers to be anywhere when writing a report or accessing critical information systems. The department uses Panasonic 54 and 55 laptops and replaces them every five years. Currently they are at the end of the first five-year period. Next year the department will

start with the First Precinct and replace the laptops. Officers dock laptops in their patrol cars. A five-year replacement policy is adequate, according to internal stakeholders.

Note: The failings of the CAD system translate into laptop failures to access CAD, another reason the CAD upgrade must be addressed.

19. In-car Mobile Data Computers (MDCs) and mobile data is web-based and internal stakeholders noted that there are no notable issues. The department uses AT&T and its bandwidth and connectivity meet the needs of the department.
20. The Motorola Solutions radio system is relatively new and includes encryption capability. Coverage across the County is good, and the expected life of this new system is 15 years.
21. The Department utilizes a data collection tool known as the "Crime Matrix," which is a program written 20 years ago. It receives arrest data dumps from across the region. It is a one-stop location for getting information about an individual contacted by the various departments using the RMS system known as CARE. Recently, the department launched an updated version of the Crime Matrix.
22. *General Order 20-097, General Order 20-057, General Order 20-94 and Special Order 18-310* are all related to arrests and prisoner processing and are aligned to best practices.
23. *General Order 18-117, entitled Unmanned Aircraft Systems (UAS)*, is aligned to best practices. FAA section 107 provides the rules and regulations for the use of UAS for the public and the private sector. The department has an acceptable UAS fleet and good safeguards on proper use.
24. FirstNet is used for department android cell phones. Detectives along with a select few others are issued department-owned cell phones. Everyone in computer services receives a phone as well. Patrol officers do not receive cell phones.
25. iPads have been issued to a select group of senior ranking officers, but the use of this technology is not widespread.
26. The department is currently utilizing Microsoft Office 365.
27. Officers' locations are tracked through the BWC software. The department tracks the GPS location of officers, provided the camera is on or the car is running. This is an important and innovative safety feature.
28. The department's IT processes and systems are CJIS compliant and contain appropriate security and audit trail accountability.
29. The department uses Power DMS software to track policy changes, sequence dating, and to track when officers read and receive new policies or policy changes. This is a best practice.
30. The department uses IA Pro software to document and track internal affairs cases, and it is adequately funded and state of the art. The department's Early Warning System is tracked through IA Pro as well. These are best practices.
31. Use of Force data tracking is done via a software called Blue Team and is adequately funded and is state of the art. This is a best practice.
32. The department has Rapid ID fingerprint scanners. All individuals charged with felonies are processed through the County jail, which also uses Rapid scanners. At precinct booking stations there are cameras and rapid laser fingerprint scanners. Some precincts do not have booking stations because they do not have holding cells. When required by law, the department collects DNA swabs through ID- Evidence/ Crime Scene. These are all standard processes.
33. An electronic system provided by MO DOT called LETS is used for tracking and filing traffic incidents and wrecks.
34. Electronic ticketing is done through the Regional Justice Information System (REJIS). All tickets are e-tickets, but officers have one book in case the ticketing system goes down. If officers do issue a paper ticket, they must enter it online when the system is restored.
35. Training records are maintained by the police academy staff. The department implemented a new software system a few years ago.
36. The department uses facial recognition technology provided by Amazon Web Services. The department uses the technology for the limited purpose of comparing unidentified images obtained during an investigation only to its mug-shot profiles, with no editing of images. The department engaged with the ACLU in adopting its policy and received approval - a commendable action.

8.2 Recommendations

IMMEDIATE:

1. Replace the out-of-date CAD system.
2. Modernize property and evidence storage, retrieval and destruction systems. (This is a big task that will likely require the formation of a strategic working group and the full effort and assistance of multiple divisions within the department and multiple County government offices, as well as a significant capital expenditure.)
3. A similar cloud-based system for body camera footage storage should be adopted for camera footage taken from detectives' interview rooms.
4. Every sworn officer should be issued a body camera.
5. The body camera policy should be amended to make clear that any officer, of any rank, involved in any potential enforcement action must turn on his/her body camera. This includes officers working under federal law enforcement authority (e.g., cross designated as U.S. Marshals).
6. Reach an agreement with federal partners to allow SLCPD members to utilize BWCs on joint operations. In the absence of such an agreement, remove certain units from the ambit of federal marshal status, such as the Street Enforcement Unit (SEU), because of their extraordinarily high exposure to potential officer-involved shootings.
7. Revise the format of the department's Standard Operating Procedures manual and divide it into related topics such as Duties and Responsibilities, General Regulations, Personnel, Arrests, Complaints, Discipline, etc. and make it searchable. Each policy should be cross-referenced to related policies by title and policy number.
8. Adopt a new best-practices model policy on intelligence gathering and all its elements, including when persons or groups are investigated, how files are maintained and shared, etc. Seek public approval from privacy groups. Train every member of the department periodically to avoid inadvertent violations.
9. *General Order 18-028, entitled Evaluation - Priority Assignment of Call Point #7* should be changed from "Shots fired, unless they are alleged hunters" to "Shots fired." Responding officers can then determine if the shots are fired by hunters or not.
10. Separate *General Order 20-037 Case Management and Warrant Application* into two separate policies. In addition, custodial interrogations should also be covered in a separate policy.
11. Trained detectives should be assigned to handle the investigation of all shooting victims. Parental kidnappings should initially be investigated by the Homicide, Robbery, Sexual Assault Unit.
12. Policy on Strip and Body Cavity Searches should be revised to match the standards set forth in the IACP Considerations Document published in September 2019.
13. Consider conducting modest, random audits of BWC use to ensure policy compliance.
14. Create a policy on when and under what circumstances BWC footage will be released to the public. Add a policy on redaction before release in certain instances. (e.g., to avoid disclosure of juveniles' identity, to protect privacy interests in the home, etc.).

NEAR-TERM:

1. Change the ALPR storage capacity and policy so footage is stored for at least a year, in order to aid detectives in their investigations.
2. Following best practices, create a new policy setting reasonable rules for secondary employment, acquire the appropriate software, and implement a comprehensive tracking and accountability system for all off-duty police work. Assign a member in the rank of Lieutenant or above to supervise all elements of secondary employment to ensure organization-wide accountability.
3. Update *General Order 11-2, "Gang Investigations,"* to reflect best practices.
4. Replace *General Order 15-43, "Police Canine,"* with one that follows the best practices laid out in the IACP policy.
5. Sensitive Locations (e.g., scene of a past police involved shooting, residence of a controversial local figure, etc.) should be added to the CAD Alert File as well as the homes of prominent elected officials and judges and houses of worship. Section VII is entitled Confidential Codes and does not mention how or if these files are ever reviewed or purged. While this segment may enhance officer safety, it also creates a potential liability situation for the department. The County Attorney should review this segment of the policy, and a review and possible purging of the files should be done annually.

-
6. A policy outlining the proper use of Spike Strips should be created or updated. Strict guidelines for use of these tools should be included with appropriate mandatory supervisory involvement. In addition, the policy should include the requirement of a formal after action report each time Spike Strips are deployed in vehicle stop situations.

LONG-TERM:

1. Form a multi-agency working group to make a critical assessment of continued viability of the self-maintained RMS system, especially considering the outstanding, competitive commercial systems being used by most large police agencies. The study should include a long-term cost-benefit analysis.
2. Evaluate the policy that stipulates that some individuals in the organization receive a department-issued phone while others do not.
3. The applicable rules for law enforcement operational UAS limitations in FAA Part 107 should be listed in *General Order 18-117 Unmanned Aircraft Systems (UAS)*. An After-Action Report by the UAS pilot should be submitted immediately after each drone deployment. The policy should be reviewed annually with input from the UAS pilots and revised as needed.
4. Change Files Systems – “Intelligence Unit Procedure” 16-5 to include an annual review verses a periodic review.
5. In *General Order 17-53 “Search and Seizure,”* point #11, "Aerial surveillance" is too broad and should be amended accordingly.

9 RESOURCE ALLOCATION

Resource allocation in policing reflects the needs of the community, which is a cornerstone of SLCPD operations. Adequate allocation allows departments to turn their attention to deployment to meet the character and demands of its residents, which are often as diverse as the community itself. Departments can clarify community needs for additional officers and resources through objective standards.

Effective study of resource allocation requires intimate community expertise, data fluency, and community-specific solutions. This review may prove intensive, but efficient resource allocation improves the SLCPD's ability to maximize both fiscal and human resources.

Teneo Risk analyzed materials relevant to SLCPD staffing levels, Calls for Service (CFS), and overall resource allocation to provide some overarching findings and recommendations. The need to more deeply assess patrol operations is critical, as patrol officers are the most visible representatives of the department, must handle initial calls for service, act as a crime-fighters, and handle most social issues. Teneo Risk found existing studies and department plans have determined that current staffing levels are adequate and recommends further action to build on these improvements.

Teneo Risk recommends the completion of a rigorous staffing allocation review as a next phase activity, that considers CFS, call volume, response times, community engagement time, patrol time, administrative time, and other key staffing variables. A new and improved CAD system will be crucial to the successful completion of this analysis.

Teneo Risk has also made a number of personnel recommendations in this report. These recommendations are summarized below. We recognize that these new positions would need to be staffed either through reallocation of personnel from other areas or through adding of new positions.

9.1 Findings

1. The average emergency response time for the eight precincts in 2019 was 5.35 minutes. The 1st and 8th precincts rank as the busiest precincts but had response times of 4.93 minutes and 4.43 minutes, respectively. Calls with response times more than 15 minutes were not included.
2. Non-emergency response time on average was 8.45 minutes in 2019. Calls that took longer than 20 minutes were not included.
3. A CAD emergency call processing time report found the SLCPD average stands at 81 seconds from the time a call was received by the 9-1-1 call-taker to being dispatched.
4. The Division of Criminal Investigation (DCI) 2019 Review in the SLCPD Strategic Plan recommended one detective be added to each DCI unit.
5. The Division of Patrol 2019 Review in the SLCPD Strategic Plan found precincts are adequately staffed at present, but the study indicated that leadership should consider the deployment of two-officer units and the possibility of additional contracts for new locations. The report further urged consideration of additional staffing for northern precincts to improve officer availability for follow-up investigations and to provide the opportunity for collaboration between officers.

9.2 Recommendations

IMMEDIATE:

1. Conduct a more thorough and comprehensive workload and staffing analysis. Variables to consider for a future review include crime rates, minimum staffing levels, per capita officer-to-population ratios, budget constraints, and an actual workload analysis. Analysis of an officer's actual workload is the most critical variable when it comes to staffing decisions. Three benchmarks could be identified easily and then be used to evaluate staffing allocation and deployment. How many officers are assigned to patrol? What is the workload level of those officers on patrol? How much time is expended handling a Call for Service (CFS)? Looking at these three measures will shed important light on how many officers a community needs and whether they are being deployed efficiently.

-
2. General staffing guidelines should be based on the “Rule of 60,” which features three variables: 60% of the total number of sworn officers in a police department should be assigned to uniformed patrol duty; the average workload for patrol personnel should not exceed 60%, meaning officers on patrol should be “free” 40% of the time to conduct proactive community engagement and follow-up; and the Total Service Time (officer-minutes) should not exceed a factor of 60, i.e., the mean service times for police-initiated CFS and for CFS received from the public via 911 should not exceed 60 minutes.
 3. Conduct an extensive analysis of the 10-hour shift model with special attention paid to the overlap periods between shifts. This model has numerous disadvantages, and if not developed and implemented properly and with careful management, the 10-hour shift plan can result in an inefficient and costly work schedule.
 4. Priorities for additional staffing should center on providing officers with more time for activities such as community engagement, precision policing activities, and routine patrol. The need for more time for “follow up investigations” by precinct personnel is not sufficient justification to increase patrol staffing. This justification would present difficulties in both internal logistics and external public relations.

Summary of Recommended Staff Positions Identified Throughout the Report

For ease of consolidation and identification, all recommended roles or units noted in this report are summarized below.

1. Identify and select a chief of staff, who will serve as a senior aide to coordinate, prioritize, and communicate the chief’s mission, vision, objectives, and strategic plan going forward; and ensure prompt, effective follow-up where needed.
2. Commit more recruiters to recruiting full time and conduct more aggressive and creative targeting of minority paths, (e.g., historically African American colleges and universities) and create a “Recruiting for Diversity” plan to target minorities and women.
3. Create an Equal Employment Opportunity investigative process that is separate and apart from traditional internal affairs investigation procedures. This new investigative entity, which could be modest in size (e.g., perhaps one or two investigators), should report directly to the chief and have access to County’s legal and human resources experts.
4. Create a Fugitive Apprehension Unit charged with locating and arresting the most prolific and predatory criminals, including those wanted on active warrants and those immediate arrestable for violent crimes based on investigative findings and probable cause.
5. Assign crime analysts directly to the two Homicide/Robbery/Sexual Assault squads as part of a pilot program. Determine whether these added resources have an outsized positive impact on these squads’ efficiency, as Teneo Risk expects.
6. Officially assign all shootings (fatal and non-fatal) to the Crimes Against Persons Unit. A detective should be assigned to each shooting. Precinct personnel who handle shooting incidents involving identified suspects who are still at large should not be tasked with finding and apprehending them.
7. Significantly increase staffing for SRU and create a fourth SRU team to ensure seven-day-a-week coverage.
8. Develop a comprehensive gang strategy that combines enforcement, investigations, intelligence-gathering, and intervention in a newly formed Gang Unit, whose mission is to disrupt and dismantle street gangs and dissuade young people from gang life.
9. Support and enhance the critical work of the precinct-based Neighborhood Policing Officers (NPOs) by creating a community affairs aide in the rank of lieutenant or captain, reporting directly to the Chief and charged with assisting the Chief on all community-policing initiatives, This aide should be tasked with ensuring consistent messaging, policy, training, implementation and follow up of the Chief’s community-outreach, problem-solving and partnership-building initiatives throughout the department in full coordination with the precinct commanders and their NPOs.
10. Consider the addition of an FTE to the PIO to allow the lead PIO additional time to strategize, plan and serve as communications counsel to the chief.
11. Following best practices, create a new policy setting reasonable rules for secondary employment, acquire the appropriate software, and implement a comprehensive tracking and accountability system for all off-duty police work. Assign a member in the rank of Lieutenant or above to supervise all elements of secondary employment to ensure organization-wide accountability.

10 CONCLUSION

Throughout 2020, the SLCPD and wider St. Louis County community have battled the twin crises of COVID-19 and a continued rise in violent crime. The nationwide spike in cases due in part to holiday travel, colder weather, flu season, and the return of children to classrooms has acutely hit St. Louis County, including police officers. Meanwhile, violent crime has continued to rise in St. Louis County despite well-intentioned anti-crime initiatives. Children remain notably and disturbingly vulnerable to shootings, car jackings, and other violent crime in the County.

During the month of November, the St. Louis County health system neared a breaking point, while department-wide outbreaks hindered policing. County Executive Sam Page in late November sounded the alarm that sky-high positivity and hospitalization rates were pushing the community into “crisis mode,” which might soon require National Guard intervention to boost ICU capacity. Police officers have endured unique risks, weathering repeated outbreaks culminating in roughly 100 officer infections since the pandemic began, according to data from early December. The department has been forced to adapt as certain divisions have been hobbled by outbreaks. The Central Patrol Division, for instance, reportedly saw 10% of its manpower depleted during a period in November due to positive tests. The sudden and unpredictable nature of outbreaks in the SLCPD has been a microcosm of the wider community, which has similarly faced swings in cases and virus spread. Officials have expressed optimism at recent vaccine development, but widespread vaccinations will likely not occur until well into 2021.

While police officers and other first responders are designated as priority groups in the state’s vaccine distribution plan, they are still behind healthcare workers in the state’s plan. Experts forecast that the pandemic will worsen through the New Year, presenting obstacles to officers as they battle the persistent crisis of violent crime.

In addition, internal controversies and lawsuits have complicated crime prevention and building community. African American officers have filed suits claiming retaliation for voicing racial discrimination concerns, while others have alleged the use of racial slurs in officer training. Lawsuits and internal racial controversies are not new challenges. However, the County has reached a critical moment in its hiring and promotion policy reviews which have been inhibited by lawsuits and race-related controversies. Addressing these disputes from the top down will not only improve hiring and promotion of officers, but bolster community relations in the context of the pandemic and a violent crime surge.

The current law enforcement landscape in St. Louis County is being negatively affected by internal and external crises, particularly the continued racial divide, the COVID-19 pandemic and violent crime. Improvements to procedures, tactics, and technologies will help the department build on its progress in an exceedingly difficult operating environment.

11 NEXT STEPS

Teneo Risk is pleased to provide these preliminary findings and recommendations which outline a prioritized list of immediate tactics the department could begin to put in place to enhance SLCPDs crime fighting abilities and to prioritize equity and inclusion in the department.

The chief's window of opportunity to make these meaningful changes is still open, and by implementing the recommendations outlined in this report, the department can make some visible and important strides in both the crime fight and equity and inclusion.

During our assessment, the team has been impressed by the dedication, professionalism, and pride which many members of the department have exhibited. While Teneo Risk has not had the opportunity to conduct community surveys or spend time with community influencers, people within the organization concede that there is currently no comprehensive plan and long-term strategy for community engagement and community policing. Teneo Risk would suggest a professional police satisfaction survey be considered for the community, and an internal employee satisfaction survey be conducted internally. Both will serve as baselines as the department moves forward.

When Teneo Risk began this engagement with the SLCPD, the chief expressed her support and cooperation in our efforts to foster greater collaboration, morale and cohesion within the department. Our team has been impressed by the dedication, professionalism, and pride that members of the department have exhibited, particularly in the face of the current climate's physical and psychological burdens, as well as the resourcing and crime challenges unique to the department and the County.

