



Recommendations for the South Bend Police Department: Implementation Guide

21CP Solutions

July 2020

Background

The City of South Bend engaged 21CP Solutions (“21CP”) to conduct an assessment of the South Bend Police Department (“SBPD” or the “Department”) in October 2019, focusing on six primary areas (also referred to as Areas throughout the document):

1. Use of force and de-escalation;
2. Body-worn cameras;
3. Bias-free policing;
4. Accountability;
5. Community engagement and participation; and
6. Officer well-being, recruitment, retention, and developing the narrative.

The City and the Police Department wanted forward-facing, actionable recommendations designed to enhance the performance and service of the SBPD in these six areas. The report, Recommendations for the South Bend Police Department, was provided to the City in April 2020. A total of fifty-six recommendations were discussed in the Report. The work of implementing the recommendations in the Report will enrich the Department’s services, transparency, and community trust.

Before the start of his term, Mayor James Mueller also released his plan, Reforming Public Safety. The Mayor identified four themes he intends to focus on during his administration: Reducing Violence, Recruiting and Retaining a Diverse Workforce Reflective of the Community, Improving Resident Participation, Officer Training, and Policies, and Building Relationships through Community Policing. All four themes align with the six areas covered by 21CP in our Report. SBPD’s efforts to implement 21CP’s recommendations will help accomplish Mayor Mueller’s promise to reform public safety in South Bend.

Implementing 56 recommendations is challenging, especially since some of the recommendations cut across the police department and involve more than just SBPD. At the same time, coordinating actions across the Mayor’s initiatives could be complicated. Consequently, 21CP was asked to provide an implementation guide to help start translating the report’s recommendations into actions and ensuring that, where appropriate, linkages are made with Mayor Mueller’s plan.

Overview of Next Steps

The Mayor may want to consider assigning someone from his office the authority and accountability for ensuring the recommendations are implemented. This is suggested for two reasons. First, some of 21CP’s recommendations implicate authority beyond only the Chief of Police, such as, those directed toward South Bend’s Board of Public Safety. Similarly, implementation of other recommendations will require the involvement of additional stakeholders from the community, city agencies, and non-profit organizations. The Mayor’s office has the convening authority to bring these stakeholders to the table. Second, as previously noted, many of the recommendations align with the Mayor’s plan to reform public safety in South Bend. As such, Mayor Mueller has a strong interest in making advancements in implementing the recommendations.

Whether it is the Chief of Police or someone else appointed by the Mayor to lead the implementation, the City and SBPD should closely review the recommendations in the Recommendations Report to determine whether all the recommendations are accepted.

Generally, the next steps are:

- Further understand the recommendations and the underlying intent behind them.
- Detail actions necessary to implement the recommendations.
- Assign responsibilities and accountabilities for implementing the recommendations.
- Track progress and challenges on a regular basis.
- Measures of success for each of the Areas should be developed and then routinely tracked and reported to the Chief and the Mayor.

The SBPD can accomplish many of the recommendations in the Recommendations Report. However, for a deep and truly transformational change to occur, all the stakeholders who have a vested interest in the success of the SBPD must collaborate. They must embrace the recommendations and make them theirs through the hard work of implementation. The checklist below will help guide the Mayor, Chief and their team in implementing the recommendations.

Next Steps: Checklist

The City and SBPD should continuously assess the recommendations throughout the planning and implementation processes. These reviews should: determine how the recommendations support each other; serve as an assessment of the resources needed to implement the recommendations; assess how the resources can be obtained; and whether expectations or timelines need to be adjusted.

The following checklist outlines these considerations and the Department's next steps as it reviews, plans for, and implements 21CP's various recommendations. It provides an overall summary of the proposed implementation process:

- ☐ Mayor appoints a person charged with ensuring the recommendations are implemented.
- ☐ Review the recommendations to determine clarity, define critical processes, and who should participate in the work groups.
- ☐ Assign a Champion to each Area to monitor the progress on the recommendations, address barriers to progress, and keep the Mayor and Chief informed of progress.
- ☐ Champions may assign a Coordinator to specific recommendations. The Coordinator will determine the actions required to accomplish a recommendation and assign responsibility for each action and a completion time frame. A Coordinator may be responsible for all the actions or, with the champion's approval, delegate to others.
- ☐ Champions review and approve the actions, assignments and timeline and submit them to the Chief. The review should make sure the actions are clear and feasible, and resources exist to accomplish the actions.
- ☐ The Chief reviews and approves the plan making sure that it is logical and feasible. He presents the plan to the Mayor and other key decision-makers.

- ☐ The Chief announces the plan to department members and the public.
- ☐ The Chief and Area Champions determine how progress on the implementation will be monitored—what will be reported, how, when, and by whom.
- ☐ Work on implementing the recommendations begins.

The remainder of this document provides guidelines on how to accomplish the above steps.

Organizing for Implementation

The Chief, Mayor, or his designee should identify a champion for each of the six Areas. The champion is accountable for ensuring each of the recommendations under his or her assigned Area are completed. A Champion may have responsibility for more than one Area. The Champion monitors how the recommendations and actions are being worked, helps to address barriers to progress, and keeps the Chief and others informed of progress. The Champion should receive regular reports from their coordinators.

The Chief or Champion will also name a Coordinator for each recommendation. The coordinator makes sure that the recommendation is completed within the specified time. A Coordinator may have accountability for more than one recommendation. The coordinator may delegate actions to others with the approval of the Champion, but the Coordinator is ultimately accountable for the implementation of the recommendation(s).

It may be beneficial to name some Champions and Coordinators from outside the SBPD. For example, there are number of recommendations which address the South Bend's Board of Public Safety. The Director or member of the Board may be a more appropriate Coordinator for some of the recommendations rather than a SBPD member. The same may be true for some of the recommendations in Area 5: Community Engagement and Participation. It may be very beneficial to have Co-Champions for this Area, one from SBPD and someone from the community. As the recommendations under this Area are assigned to Coordinators, consideration should be given to using community members where appropriate.

Communication Plan

At minimum, the Chief, Mayor, or his designee, and the Area Champions should meet monthly to review the progress on implementing the recommendations. The action plan on Page 8 can guide these discussions. The purpose of this monthly meeting is to acknowledge the actions completed, discuss issues to be addressed, and identify the actions to be taken over the next 30 days.

The key elements of the plan should be shared internally and communicated externally. These communications should emphasize the extent to which each member of the SBPD has a role and responsibility for achieving the recommendations and the intent of the changes.

SBPD and the City should also decide what elements of the plan to make public and how best to do it. Key stakeholders essential to making the plan a reality must also be briefed and offered an opportunity to help define the specifics of their contribution. SBPD may consider whether to post the plan on its website along with quarterly updates concerning progress. This may help keep all participants involved and focused on their areas of responsibilities as well as sharing successes and in a transparent way with the community.

Implementation Planning

Implementation planning uses a process that involves planning the work, identifying tasks and subtasks, determining the time frame, and assigning the people and resources necessary to implement the improvements.¹

¹ J. DeLayne Stroud. "The Implementation Plan – Getting Beyond the Quick Fix." ISIXSIGMA. <https://www.isixsigma.com/implementation/implementation-plan-getting-beyond-quick-fix/>.

A first step is to develop a work plan followed by:

- A resource assessment and budget requirements;
- Methodologies to track progress and determine successful achievement of the recommendations; and
- An accountability system where progress and challenges are reported out to key decision makers.

A brief discussion and examples of each implementation step is provided in the next section. The last part of the Guide offers some guidance for each Area which may help ignite creative thought and meaningful action for translating the recommendations into transformational change.

The Appendix is 21CP's attempt to order the recommendations by short, mid, and long-term efforts. It must be stressed that this ordering is just a first step. The City and SBPD must determine if all the recommendations are acceptable and will be implemented. The City must be aware of the challenges and resource requirements of the recommendations and these factors need to be reflected in the implementation prioritization of the recommendations.

Implementation Steps

Prioritization. The first step is to prioritize the recommendations. No organization can simultaneously work on 56 recommendations. This is true for a variety of reasons – resource demands, interdependencies of recommendations, level of complication, and organizational fatigue. Many of these recommendations address the fundamental way SBPD does business. This effort requires a change management approach and a sensitivity to the amount of change SBPD can adopt over time.

The strategic importance of a recommendation also plays into prioritizing the recommendations for implementation. A recommendation is strategically important if other recommendations are linked or dependent on it. An example of how one recommendation links to another is illustrated by Recommendation 4.11:

Recommendation 4.11. South Bend should explore the many models of civilian oversight functioning across the country and adopt additional approaches that best match the needs of the South Bend community and SBPD. This may include the revamping or restructuring of the Board of Public Safety. A civilian panel should select the model and assist in the implementation of the ultimate oversight approach.

Depending on how South Bend redefines the functions of the Board of Public Safety, it will directly impact some of the other recommendations. We are not suggesting work on other recommendations be delayed. We are suggesting this recommendation is of strategic importance and should be addressed early in the implementation process. There are other recommendations which are strategically important and need to be considered when prioritizing recommendations.

21CP's efforts at prioritizing the recommendations consider three decision criteria – ease of implementation, the degree to which input and resources outside of SBPD are required, and the strategic importance of each recommendation. We used these criteria to sort the recommendations into three categories – short, mid, and long-term.

- **Short-term recommendations** are ones which are easier to implement and require only SBPD available resources.
- **Mid-term recommendations** are recommendations that are easy to somewhat difficult to implement and require SBPD and/or other resources.
- **Long-term recommendations** are difficult and/or require more time and must involve resources and people from outside the Department.

When a recommendation was deemed strategically important to other recommendations, its priority was moved up. For example, a mid-term recommendation was moved up to the short-term category if it was found to be necessary in achieving other recommendations.

SBPD and the City should review our prioritization determinations and consider whether they are feasible. Then, starting with the short-term recommendations, a sequencing for work on the various recommendations classified as short-term should be identified. The Area Champions should be involved in this prioritization discussion.

Developing an Action Plan. A detailed action plan should be developed which lists each recommendation, who is responsible for implementing it, a timeframe for completion and status. The assigned Coordinators should develop the action plan for his or her recommendations. The appropriate Champion then reviews and approves their sections of the action plan. The list of actions or tasks for each recommendation should include required training and an assessment of compliance. A format for an action plan is provided on the page 8. This format is just a sample. The format for the action plan is not important, but establishing responsibility, time frames, and status updates are essential. A thoughtful, concise action plan is an essential first step in the implementation process.

Establishing an Accountability System. Once a plan of action has been developed, the next step is to establish a system which ensures the work is being done, challenges are addressed, and barriers are removed so recommendations can be implemented. A format like the one on the next page can be used as a reporting mechanism. A monthly meeting on progress with the Chief and Mayor or his designee will help maintain focus and momentum.

A second aspect of the accountability system is to ensure behaviors of officers and others actually change. It is not enough to write new policy. SBPD members must be effectively trained and a compliance methodology must be in place to determine if officers are adhering to policy. For example, Recommendation 3.2 states, “SBPD policy should ensure the collection of rigorous information about all interactions with residents or civilians that are not voluntary contacts, including field interviews, Terry stops, and traffic stops.” Determining compliance with this recommendation goes beyond just having a policy. It requires a methodology to determine whether officers are accurately completing the form designed to capture non-voluntary contacts. Audits and other means of determining compliance should be conducted on a routine basis and the results submitted to the Chief for his review and action.

These are the stages of implementation. This is hard work because the practice and culture of SBPD is being changed as the recommendations are put into practice. The structure outlined will help manage the change process.

Sample Action Plan

Report Date: August 2020

The following is a hypothetical example, showing how an action plan can be used to set tasks, assignments, dates and accountability. As such, it is incomplete.

Area/Area	Recommendations	Action or Task	Lead	Target Date	Actual Progress	Status
	<i>List recommendations</i>	<i>List initiatives from Step 1</i>	<i>List initiative owner here</i>	<i>Include target goal set during planning progress</i>	<i>Include most recent status on initiative</i>	<i>Code in color</i>
Area 1: Use of force & de-escalation	Recommendation 1.3. SBPD should adopt a standalone policy on de-escalation that requires officers to deploy de-escalation strategies and tactics whenever it is safe and feasible to do so.	<ul style="list-style-type: none"> Research best practices. Create work team. Draft policy. 	<ul style="list-style-type: none"> George W 	<ul style="list-style-type: none"> White paper developed prior to first work team meeting, 10/2020. 	<ul style="list-style-type: none"> White paper complete 	
Area 2: Body-worn cameras	Recommendation 2.1. SBPD should review and revise Policy 424 to ensure that its 2019 requirements regarding body camera activation are fully incorporated.	<ul style="list-style-type: none"> Compare 424 with 2019 requirements Research model BWC policies. 	<ul style="list-style-type: none"> Mary S. 	<ul style="list-style-type: none"> Prepare a document with findings from the reviews and recommendations on revising Policy 424. 6/2020 	<ul style="list-style-type: none"> Work behind schedule. 	
Area 3: Bias-free policing	Recommendation 3.2. SBPD policy should ensure the collection of rigorous information about all interactions with residents or civilians that are not voluntary contacts, including field interviews, Terry stops, and traffic stops.	<ul style="list-style-type: none"> Obtain and review model policies, forms, and reports from other departments. Compare SBPD policy to model samples. 	<ul style="list-style-type: none"> Jane D. 	<ul style="list-style-type: none"> Submit recommendations based on review 9/2020 	<ul style="list-style-type: none"> Work in progress 	
Area 4: Accountability	Recommendation 4.5. SBPD should ensure that residents can file complaints without intimidation or dissuasion. This may include the filing of anonymous complaints or providing a	<ul style="list-style-type: none"> Review and research the current process. Hold a series of community focus groups to get their 	<ul style="list-style-type: none"> Alfonso S. 	<ul style="list-style-type: none"> Hold the community focus groups by 12/2020 	<ul style="list-style-type: none"> Work not started. 	

	complaint to non-sworn SBPD personnel or other City designees.	<ul style="list-style-type: none"> suggestions on the process. Submit recommendations for approval. 				
Area 5: Community Engagement & Participation	Recommendation 5.1. SBPD should implement a comprehensive community and problem-solving policing model one that is created in true collaboration with the community and that makes community engagement and addressing community problems the shift-to-shift and minute-to-minute way that SBPD does business.	<ul style="list-style-type: none"> Identify departments considered to be best in class for community policing. Establish a working group consisting of SBPD, city employees and residents. Obtain information and possibly visit a best in class department. 	<ul style="list-style-type: none"> Ray M. 	<ul style="list-style-type: none"> Establish the working group by 9/2020 	<ul style="list-style-type: none"> Working on identifying the best-in-class departments. 	
Area 6: Officer well-being, recruitment, retention, and developing the narrative.	Recommendation 6.2. SBPD should implement a more comprehensive, 360-degree officer wellness program.	<ul style="list-style-type: none"> Inventory SBPD's officer wellness services and level of participation. Reach out to unions and associations servicing SBPD members. 	<ul style="list-style-type: none"> Samantha N. 	<ul style="list-style-type: none"> Talks with the unions and association complete by 2/2021 	<ul style="list-style-type: none"> Work not started. 	

Practical Suggestions for Moving into Transformation

The previous section lays out the mechanics of implementing the recommendations. This section identifies some approaches and guidance for each Area which may help ignite creative thought and meaningful action for translating the recommendations into transformational change. The intent of the examples is to illustrate some of the underlying thought for the six Areas. One recommendation under each Area is highlighted and discussed. Once again, the purpose is to show how delving deeply into a recommendation can provide insight and direction.

First, there are some general principles underlying 21CP's approach and are worth sharing here.

General Principles

- I. Police reform is grounded in establishing and maintaining community trust in the police and in empowering the community to participate in key decisions about how they want to be policed.
- II. All members of SBPD from every rank and assignment, including civilians, should be part of this transformational effort.
- III. Truly listening to the members of SBPD and the community it serves will increase the likelihood changes will work and be accepted.
- IV. Creating work groups consisting of partners and stakeholders will promote communications and sharing of ideas.

SBPD will truly transform itself for the future by adopting these principles while doing the work of changing how SBPD provides service and engage with internal and external partners.

Areas

This document is a companion to *Recommendations for the South Bend Police Department*, April 2020. Greater detail under each Area is found in that report. The Area Champions are encouraged to read the report and the sources cited in them to fully understand the recommendation(s) under their Area.

Area 1: Use of Force & De-Escalation

The recommendations in this focus area are aimed at sharpening SBPD's policies, procedures, reporting, and reviewing the use of force employed by officers. Good policies and practices are not enough. Training on the policies and procedures, along with practical scenarios requiring decision-making skills is critical for improving officers' use of force and de-escalation techniques.

Example

Recommendation 1.3. SBPD should adopt a standalone policy on de-escalation that requires officers to deploy de-escalation strategies and tactics whenever it is safe and feasible to do so.

- SBPD should prominently address de-escalation in its core use of force policy.
- SBPD must also emphasize that the duty to de-escalate is applicable across all interactions and encounters, regardless of whether the incident ultimately involves the need to use force.
- Both the Seattle Police Department and the Cleveland Division of Police established a standalone, separate de-escalation policy outlining the general de-escalation imperative and inventories critical de-escalation tactics – such as the use of cover and concealment, tactical repositioning, calling in additional resources, and strategic communication skills.
- De-escalation skills need to be developed and practiced as often as firearm skills.

Area 2: Body-Worn Cameras

The set of recommendations under Area 2 focuses on improving SBPD's use of body-worn cameras (BWC) in order to maximize the benefits. For the benefits of BWCs to be fully realized, agencies need clear policies on when body worn cameras must and may not be used, as well as infrastructure that allows officers to store captured video. For cameras to foster transparency and accountability, there needs to be a department and community-wide understanding of when officers activate and do not activate their cameras as well as an effective, efficient process for officers to flag, tag, and store footage.

Example

Recommendation 2.1. SBPD should review and revise Policy 424 to ensure that its 2019 requirements regarding body camera activation are fully incorporated.

- Knowledge, technology advances, and community expectations change with time. Policies should be routinely reviewed to ensure policy reflects these changes and current practices.
- Discrepancies between policy documents, memorandums, and training bulletins result in confusion and poor performance. There must be total alignment between these types of documents.
- There are model policies on BWC from the Bureau of Justice Assistance, IACP, and specific jurisdictions like Salt Lake City, New Orleans, and Seattle Police Departments. These and other examples should be reviewed and used to help address the issues identified in the Report.

Area 3: Bias-Free Policing

Area 3 concentrates on SBPD's internal policies, practices, and operations with an eye toward ensuring officers do not provide differential treatment to any person or class of people. This requires going beyond a statement but also providing methods to ensure officers are practicing bias-free policing.

Example

Recommendation 3.2. SBPD policy should ensure the collection of rigorous information about all interactions with residents or civilians that are not voluntary contacts, including field interviews, Terry stops, and traffic stops.

- Officers must have some degree of discretion. Management must have a means of knowing how that discretion is used.
- There are significant constitutional concerns that are implicated for any non-voluntary stop which warrant regular, pragmatic documentation of whom an officer stops and why.
- There are basic data requirements essential for assessing the impact and outcomes of non-voluntary stops.
- There are technology systems which can be used to collect, document, and analyze non-voluntary stops.
- There should be appropriate supervisory review and approval of documents prepared and submitted by officers.
- Biased policing can occur at the individual officer level and also at departmental level. Practices may not have the intent to discriminate but may have a discriminatory outcome. For this reason, a regular review and analysis of non-voluntary stops by unit, district and department-wide should be conducted and shared with the public.

Area 4: Accountability

Police accountability references both holding individual police officers, as well as the police department, responsible for providing constitutionally based police services. The recommendations under this area reflect this range of accountability. Some recommendations are focused on ensuring officers are accountable for their behaviors. Other recommendations are offered to make sure the community can hold the SBPD accountable.

Example

Recommendation 4.5. SBPD should ensure that residents can file complaints without intimidation or dissuasion.

- Community trust in a police department is the foundation of its legitimacy.
- Crucial to community trust and legitimacy is the community's belief that they can submit complaints about individual officers which will be accepted and fairly and thoroughly investigated by the department.
- SBPD must ensure that residents can make a complaint through whatever mechanism or mode may be most accessible or comfortable.

Area 5: Community Engagement & Participation

The police cannot fight crime and address public safety issues alone. Instead, they must build partnerships with the residents of their precinct to identify and help solve community problems.

Example

Recommendation 5.1. SBPD should implement a comprehensive community and problem-solving policing model – one that is created in true collaboration with the community and that makes community engagement and addressing community problems the shift-to-shift and minute-to-minute way that SBPD does business.

- Police departments have increasingly embraced community-oriented policing as an organizational philosophy.
- Community policing, at its core, involve collaboration between the community, the police department, and other city-based institutions to create a feedback loop on the outcomes of implementing recommendations to reduce crime.
- Not only should residents work with the police in identifying crime problems they should also have a role in helping to address those crime problems.
- Community policing gives residents ownership and responsibility in the problem-solving work.

Area 6: Officer Well-Being, Recruitment, Retention & Developing the Narrative

This is a broad area covering multiple topics. At first glance, it may appear there is little connection between these four topics. That assumption is a false one. Officer well-being directly relates to being able to recruit and retain officers. Job satisfaction arises not just from pay and benefits. More often than not, satisfaction comes from being valued and treated with fairness and respect. An internal and external communication plan that highlights the good work of SBPD will also contribute to the efforts of recruitment and retention.

Example

Recommendation 6.2. SBPD should implement a more comprehensive, 360-degree officer wellness program.

- Daily, officers face challenges and stresses which others cannot imagine.
- Studies have found more officers died as a result suicide than line-of-duty deaths. They also show symptoms of post-traumatic stress disorder at higher rate than the general population.

- This level of stress bleeds into officers' personal lives and the stressors in their personal life impacts their ability to perform their duties.
- Officer wellness program should address and provide services in the areas of physical health, financial well-being, mental and emotional health.

Conclusion

Moving from recommendations to action to transforming the South Bend Police Department requires commitment and hard work. This document is offered as a guide for starting the change process. SBPD can firmly become a model for best-in-class policing by developing an implementation plan, deeply exploring and understanding the intent of the recommendations, and working to realize the change inherent in the set of recommendations

Appendix: Suggested Priority Determinations

Use of Force & De-Escalation

	Preliminary Priority Determination		
	Short-term	Mid-term	Long-term
<u>Recommendation 1.1.</u> SBPD's use of force policies and review procedures need to be revised to better reflect an appropriate focus on objective reasonableness, necessity, proportionality, and de-escalation where safe and feasible to do so. The revised policies should reflect the particular concerns, realities, and experiences of the South Bend community and officers.			
<u>Recommendation 1.2.</u> SBPD's use of force policies should clarify that all officers have an affirmative duty to intervene if they observe a member performing in a manner inconsistent with SBPD policy or a reasonable officer would believe under the circumstances that an officer may run a substantial risk of violating SBPD policy.			
<u>Recommendation 1.3.</u> SBPD should adopt a standalone policy on de-escalation that requires officers to deploy de-escalation strategies and tactics whenever it is safe and feasible to do so.			
<u>Recommendation 1.4.</u> SBPD should address what could appear as an over-reliance on CEW usage and deployment on subjects who did not appear to be physically aggressive toward officers or others but, instead, were fleeing on foot.			
<u>Recommendation 1.5.</u> SBPD should explore mechanisms for clarifying, streamlining, and introducing efficiencies into post-incident reporting, including in use of force reporting.			
<u>Recommendation 1.6.</u> SBPD should revise its Use of Force Review Form, currently used by its Use of Force Committee, to analyze the incident more comprehensively and in light of a more specific force policy rather than simply law.			
<u>Recommendation 1.7.</u> SBPD's recently-initiated after-action report process, which many officers are finding helpful, should be expanded and institutionalized – enabling the Department to incorporate ongoing lessons learned into their day-to-day practices, to identify future training priorities, and to develop specific, real-world scenarios for such training.			
<u>Recommendation 1.8.</u> SBPD needs to reboot and relaunch a meaningful Crisis Intervention Training (CIT) program to ensure safe, effective response to individuals experiencing behavioral health challenges.			
<u>Recommendation 1.9.</u> The Department should provide all officers with mandatory, on-going in-service training grounded in practical, scenario-based instruction.			

<u>Recommendation 1.10.</u> SBPD needs to ensure that all of its training is consistent with contemporary best practices.			
<u>Recommendation 1.11.</u> The community should participate with SBPD in identifying training priorities, developing curricula, and providing training where the community are the appropriate subject-matter experts.			
<u>Recommendation 1.12.</u> SBPD supervisors should receive in-depth training on the investigation and review of use of force, including but not limited to: <ul style="list-style-type: none"> • The distinctions between policy and practice; • Whether supervisors seek to locate and contact witnesses; • Whether efforts are made to memorialize all officers who are on the scene and obtain statements or narratives from witness officers; • Whether there is a custom or practice to consistently review video footage during a supervisory force review; and • The role of command staff in reviewing force. 			

Body-Worn Cameras

Preliminary Priority Determination

<u>Recommendation 2.1.</u> SBPD should review and revise Policy 424 to ensure that its requirements regarding body camera activation are clear.			
<u>Recommendation 2.2.</u> SBPD should ensure that it adequately addresses outstanding challenges with its body-worn camera system.			

Bias-Free Policing

Preliminary Priority Determination

<u>Recommendation 3.1.</u> SBPD should update its Bias-Free Policing policy (currently Policy 401) to: <ul style="list-style-type: none"> • Expand its statement of guiding principle; and • Clarify that officers have an affirmative responsibility for reporting incidents where they observe or otherwise become aware of officers whose performance or actions could constitute a violation of the policy. 			
---	--	--	--

<u>Recommendation 3.2.</u> SBPD policy should ensure the collection of rigorous information about all interactions with residents or civilians that are not voluntary contacts, including field interviews, Terry stops, and traffic stops.			
---	--	--	--

Accountability

Preliminary Priority Determination

<u>Recommendation 4.1.</u> SBPD must ensure that all instances of possible officer misconduct, whether identified by a member of the public or the Department, are investigated in a full, fair, and timely manner.			
<u>Recommendation 4.1.1.</u> IA should serve as the hub for all investigations of officer misconduct – either conducting investigations themselves or coordinating and overseeing investigations conducted elsewhere in the department or by outside entities.			
<u>Recommendation 4.1.2.</u> SBPD should establish an IA Manual with rigorous protocols, procedures, and processes for conducting investigations.			
<u>Recommendation 4.1.3.</u> SBPD should ensure that IA personnel receive regular, ongoing training on administrative investigations.			
<u>Recommendation 4.2.</u> SBPD should ensure that supervisors review all IA investigations and provide detailed documentation as to the nature of their review, their recommended adjudication, and the grounds or justification for their adjudication determinations.			
<u>Recommendation 4.3.</u> SBPD must ensure, across all supervisory personnel, that the reasonable officer standard forms the foundation of the review of specific officer performance when appropriate and that command staff review directly addresses the preliminary factual findings of prior review by investigators and/or chain of command.			
<u>Recommendation 4.4.</u> To promote community trust and officer confidence in the fairness and integrity of the accountability process, Board of Public Safety should adopt and adhere to a “discipline matrix” that provides expected discipline ranges for various types or classes of policy violations.			
<u>Recommendation 4.5.</u> SBPD should ensure that residents can file complaints without intimidation or dissuasion.			
<u>Recommendation 4.6.</u> SBPD and the City of South Bend should establish, in partnership with the community, protocols and timelines for the release of information and data following critical incidents.			
<u>Recommendation 4.7.</u> SBPD should provide meaningful and substantive opportunities for the community to provide feedback on proposed policy changes, as well as to set an agenda for subsequent policy innovation.			

<u>Recommendation 4.8.</u> SBPD's current Open Data Portal, which is a commendable initiative aimed at information-sharing and public transparency, should be expanded further to include additional real-time information.			
<u>Recommendation 4.9.</u> SBPD should post on its website all policies, manuals, and related written materials (such as forms or electronic data templates) and keep such materials up-to-date.			
<u>Recommendation 4.10.</u> The Board of Public Safety's meeting records should be more readily accessible to the public.			
<u>Recommendation 4.11.</u> South Bend should explore the many models of civilian oversight functioning across the country and adopt additional approaches that best match the needs of the South Bend community and SBPD. This may include the revamping or restructuring of the Board of Public Safety. A civilian panel should select the model and assist in the implementation of the ultimate oversight approach.			

Community Engagement & Participation

Preliminary Priority Determination

<u>Recommendation 5.1.</u> SBPD should implement a comprehensive community and problem-solving policing model – one that is created in true collaboration with the community and that makes community engagement and addressing community problems the shift-to-shift and minute-to-minute way that SBPD does business.			
<u>Recommendation 5.2.</u> Building on promising dialogues in the Community Advisory Groups sponsored by the Board of Public Safety, SBPD should develop a Community and Problem-Solving Policing Plan developed in true partnership with all of South Bend's diverse communities, including SBPD officers at all levels. The focus should be on strategies for ensuring that engagement and problem-solving becoming the core duties of all SBPD officers.			
<u>Recommendation 5.3.</u> SBPD should consider broader use of foot, bike, and other alternatives to motorized patrol.			
<u>Recommendation 5.4.</u> SBPD should provide regular, unassigned time for patrol officers to engage with community members, ensuring that officers do not spend entire shifts simply running from call to call and have meaningful time to proactively solve the types of community problems that cause and promote crime – which appears equally important to South Bend residents and officers.			

<u>Recommendation 5.5.</u> As part of a renewed focus on community problem-solving, SBPD should ensure structures and processes for feedback loops to be closed and for SBPD to help effectively coordinate responses across city agencies.			
<u>Recommendation 5.6.</u> The Community and Problem-Solving Policing Plan should consider a formalized process and system for mental health professionals to provide mental health services for crime victims' families and affected community.			
<u>Recommendation 5.7.</u> The City and SBPD should look for opportunities to strengthen and build on the collaborative problem-solving opportunities of the Group Violence Intervention ("GVI").			
<u>Recommendation 5.8.</u> SBPD's community engagement and partnership efforts need to be grounded in person-to-person listening, candor, humility, and open-mindedness. The goal of such engagement should be authentic collaboration with community on identifying and addressing community problems and public safety issues.			
<u>Recommendation 5.9.</u> After establishing a Community and Problem-Solving Policing Plan, SBPD should develop and implement mandatory training for all officers, and for community members, on community engagement and problem-solving skills.			

Officer Well-Being, Recruitment, Retention & Developing the Narrative

Preliminary Priority Determination

<u>Recommendation 6.1.</u> SBPD should create and implement a strategic plan for recruitment, hiring, and retention to ensure that SBPD attracts well-qualified, diverse recruits familiar with policing in a challenging urban environment and keeps them on the force so that the Department and community benefit from their long-term relationships with residents.			
<u>Recommendation 6.1.1.</u> The Department should formulate a comprehensive professional development program, including opportunities for leadership training, educational opportunities, and cross-training programs with neighboring jurisdictions and other city departments.			
<u>Recommendation 6.1.2.</u> The City and Department should explore changes in officer compensation and/or benefits – which current SBPD officers say has the potential to improve morale and increase officer retention.			
<u>Recommendation 6.1.3.</u> The City, with SBPD, should explore mechanisms for reducing the length of the hiring process.			

<u>Recommendation 6.1.4.</u> The City, with SBPD, should explore whether minimum hiring qualifications and/or disqualifying characteristics should be modified (such as the moratorium on beards and tattoos).			
<u>Recommendation 6.1.5.</u> SBPD should ensure that its recruitment activities are a year-round effort, with sufficient resources allocated for personnel to work on recruiting activities and for marketing initiatives.			
<u>Recommendation 6.2.</u> SBPD should implement a more comprehensive, 360-degree officer wellness program.			
<u>Recommendation 6.2.1.</u> SBPD should establish a program and protocols to assist officers who have responded to high-stress calls, providing both mandatory and voluntary opportunities for officers to be matched with mental health services.			
<u>Recommendation 6.2.2.</u> SBPD should support the implementation of a robust, structured peer support team with clearly defined roles, responsibilities, and goals. Similarly, it should consider implementing a long-term mentoring program, matching officers with senior personnel from the time they are in the Academy.			
<u>Recommendation 6.2.3.</u> Existing support services, like the Employee Assistance Program, should be better utilized within the Department.			
<u>Recommendation 6.2.4.</u> SBPD should explore enhanced mechanisms for officers to provide feedback about their experiences, such as regular employee satisfaction surveys and improved exit interviews.			
<u>Recommendation 6.3.</u> SBPD should implement a meaningful, non-disciplinary Early Intervention System aimed at identifying potentially problematic performance trends before they become problems – allowing the Department to provide opportunities for professional development and skill-building where the Department identifies needs among its personnel.			
<u>Recommendation 6.4.</u> The Department should ensure that line officers have ongoing, meaningful opportunities to interact directly with the Chief and senior command, especially after high-profile incidents and during times of heightened activity.			
<u>Recommendation 6.5.</u> In the same manner that new or updated policies should be the subject of community participation and collaboration, individual officers should be able to meaningfully participate in the policy development process.			
<u>Recommendation 6.6.</u> As part of its Community and Problem-Solving Policing Plan, SBPD should partner with its officers and members of the public to construct a formalized communication plan aimed at ensuring more comprehensive and widespread dissemination of information about what the Department is doing.			



Matthew Barge
Jessica Drake
Walter Katz
Charles H. Ramsey
Sean M. Smoot
Roberto Villaseñor
Project Team

21CP Solutions