

**Police Department Audit – Operational  
Scope of Work**

SALT LAKE CITY, UTAH

June 17, 2021

**matrix**   
consulting group

## Table of Contents

1.	Introduction and Executive Summary	1
2.	Approaches to Mental Health Response	12
3.	Core Police Functions and Call Diversion Opportunities	27
4.	Employee Discipline and Personnel Management	37
	Appendix – Sample Police Employee EIP (Tampa)	74

# 1. Introduction and Executive Summary

The Matrix Consulting Group was retained by Salt Lake City to assist them with an audit of the Police Department focused on key questions related to both financial and operations aspects of the department. It is important to note at the outset that the scope of work for this project was targeted, not a comprehensive audit of the Police Department. The scope items included in the Operational Assessment were determined through a process last year that involved the Council, staff in the City and the Police Department as well as the community.

This report covers the analysis related to the operations questions raised in the scope of work.

## 1. Scope of the Study

The operational scope of this audit included the following areas of inquiry and evaluation:

1. Compare the City's Internal Affairs process and structure to best practices and identify areas for improvement.
2. Compare the existing disciplinary system to best practices and innovations at other law enforcement agencies.
  - Identify areas for improvement to enhance independence, transparency and accountability. avoided / underutilized?
  - Evaluate opportunities for employee coaching and counseling.
3. Evaluate the personnel management system and identify any barriers that exist to correction, training and counseling of personnel by supervisors.
4. Identify whether the memorandum of understanding between the City and Police Association create duplicative or complementary processes and recommend areas for improvement.
5. Evaluate best practices in law enforcement relating to policies, use, archiving, review and public access of body camera data.
6. What are the core policing functions of the Department? What functions does the Department perform that are not traditionally policing activities? What functions can be performed by other agencies or different kinds of staff.

7. Review the Police Department's responses to mental health crises and identify areas for improvement.
8. Review mental health services available to Police Department employees, the ability of employees to participate, existing utilization, and areas to expand support.
9. Recommend operational efficiencies or partnerships that could be achieved with existing resources.

## 2. Key Themes and Findings.

While the detailed analysis and findings are contained in subsequent sections of this report, the following points summarize key themes that have emerged from the conducted related to the Operational items in the scope of work for this project.

### Approaches to Mental Health Response

Co-response of officers and mental health professionals to crisis events is a highly effective approach that should be prioritized, as it likely achieves better outcomes such as diverting individuals from arrest and into services. However, CIT/HOST unit is not on duty during the hours in which these types of calls most likely occur, nor do they work on the weekends.

Hours and workdays should be expanded and staggered for both CIT/HOST and Community Connection Center personnel to meet these unmet needs and provide greater availability to respond to behavioral crisis events.

There are opportunities for alternative forms of response to low priority calls for service involving civilian paraprofessional personnel.

### Core Police Functions and Call Diversion Opportunities

Establish a new civilian field responder classification, Community Service Officer (CSO), that handles lower-priority calls for service that do not require a sworn officer to respond.

Add 20 new full-time positions under the new Community Service Officer (CSO) classification.

## Internal Affairs and Disciplinary Processes

- In many way, current Salt Lake City Internal Affairs processes represents 'best practice', specifically in accepting complaints from a variety of methods.
- The department has strong policies mandating entry and tracking of complaints.
- There are nearly as many internally generated complaints as externally generated complaints which indicates a high level of internal accountability.
- The department could improve transparency by publishing IA complaint statistics online.
- The current discipline process uses a limited tier structure system to access potential discipline, but there is a large variance in potential outcomes from the same policy violation.
- The department is looking to move to a formalized discipline matrix which is an becoming widespread throughout the country.

## Personnel Management Systems

- The current early warning system does not operate effectively and needs significant changes to be more effective.
- Changes may require different software than currently utilized.

## Employee Wellness and Mental Health

- Two recent employee surveys indicated that many officers are struggling with depressed, had difficulty concentration and 12% had suicidal thoughts.
- SLCPD has identified the need for clinician to address some of these issues.
- There is a need to further develop a wellness program that includes additional training and counseling / support available.

## Body Worn Cameras

- The body worn camera policy is clearly written and incorporates state code.
- The department is actively auditing body worn camera video to ensure compliance with police.
- Preliminary audit results indicate officers properly activate their camera 92% of the time, however they only noted activation 47% of the time as required and interrupted video within policy only 43% of the time.
- Compared to other police department audits reviewed, SLCPD had a better activation rate than several of their peers.

Ordinance 54-2020 only requires 5 audits per month which is not adequate to gain meaningful insight into whether body worn cameras are operated within policy consistently.

### **Memorandum of Understanding between the City and the Police Association**

- Revise policy to enable supervisors to investigate and address low level complaints without violating agreed upon contractual rights.
- Negotiate with the Salt Lake Police Association regarding wording and/or what is considered discipline at the lowest level.

A summary of the recommendations to resolve the issues identified is provided next section together with plans for implementing each of them.

### **3. Recommendations and Plan for Implementation**

The project team’s evaluation of the items included in the scope of work for the Operational Assessment resulted in many recommendations to address the issues identified above (Key Themes). These recommendations are summarized in the table beginning in the next page which also includes implementation steps, estimated cost impacts and timeframe for implementation.

\* \* \*

The body of the report should be accessed to review in depth discussions behind these recommendations and the recommendations themselves.

Recommendation	Steps Required	Financial Cost	Timeframe
Prioritize the co-response model to mental health crisis response over other approaches.	Implementation of redeployment changes	None	Immediate
Shift CIT training for those outside of CIT/HOST to a volunteer/self-selection approach, and conduct the training as a secondary priority relative to meeting expanded co-response coverage needs.	Implementation of redeployment changes Command decision	None	Immediate
<i>At current CIT/HOST unit staffing levels, the following deployment changes should be made to provide co-response during virtually all hours and days where mental health crisis calls most frequently occur:</i>			
Two officers should be redeployed to afternoon shift hours (1430-0030, or 2:30 PM to 12:30 AM).	Command decision	None	Immediate
One CIT/HOST officer on each shift should work a staggered schedule that covers Saturday and Sunday.	Command decision	None	Immediate
Two clinicians from the Community Connection Center should be redeployed to afternoon shift hours (1430-0030, or 2:30 PM to 12:30 AM).	Command decision	None	Immediate
One clinician on each shift should work a staggered schedule that covers Saturday and Sunday.	Command decision	None	Immediate
The CIT/HOST sergeant should vary and stagger hours as needed to provide additional coverage to both sets of assignments.	Command decision	None	Immediate

Recommendation	Steps Required	Financial Cost	Timeframe
Salt Lake City should consider offering pay incentives for both officers and clinicians working afternoon shift hours and weekends in order to be able to consistently fill these assignments.	Meet and confer with SLCPA MOU update	Variable, ~\$12k/yr.	Q1 2022
Increase the number of officers on the CIT/HOST team by an additional four authorized positions, resulting in a total of eight officers assigned to the unit.	Budgetary allocation for additional positions	\$358,818	Q4 2021
Increase the number of clinicians by an additional one authorized position, resulting in a total of eight case managers and therapists assigned to the unit.	Budgetary allocation for additional positions	\$74,647	Q4 2021
Adopt a warm handoff approach for individuals being released from treatment, where the crisis response team meets with the individual patient's clinical team and the individual to discuss care plan, set up appointments, and provide transport.	Adapt information systems to support additional case management data.	–	Q2 2021



Recommendation	Steps Required	Financial Cost	Timeframe
<b>Core Police Functions and Call Diversion Opportunities</b>			
Establish a new civilian field responder classification, Community Service Officer (CSO), that handles lower-priority calls for service that do not require a sworn officer to respond.	Meet and confer with SLCPA. Establish policies for civilian call response; develop training program. Train dispatchers on dispatching alternative resources. New classification established by HR. Purchase uniforms, equipment, vehicles.		Q2 2022
Add 20 new full-time positions under the new Community Service Officer (CSO) classification. The additional cost of this would be about \$1,602,720 in salary and benefits at 67% of the compensation of a police officer.	Contingent upon completion of all steps in previous recommendation Budgetary allocation for additional positions Hire and train personnel	\$1,602,720	Q4 2022
<b>Internal Affairs Processes</b>			
Update IA process to new proposed policy which outlines types of corrective action that can be taken that are not considered discipline which allows for better corrective action and less administrative hearings for issues that would not result in actual discipline of days off or termination.	Command Decision Meet and confer with SLCPA. MOU update	None	Immediate

Recommendation	Steps Required	Financial Cost	Timeframe
Adopt the proposed change that allows sergeants to handle limited minor complaints in the field and provides that the complaint “shall” be entered into “Blue team” employee management database.	Command decision Meet and confer with SLCPA. MOU update	None	Immediate
Adopt proposed policy change that would require minor complaints be handled by division commands and more serious complaints to be handled by IA investigators.	Command decision	None	Immediate
Post complete IA complaint statistics on public website.	Command decision	None	Q4 2021
Post more Use of Force information with more breakout categories including demographics.	Command decision	None	Q4 2021
Adopt the proposed discipline matrix to establish consistent discipline for all employees.	Command decision	None	Q3 2021
Adopt policy that would require internal affairs investigations be completed even when an employee resigns or retires.	Command decision	None	Immediate
Adopt proposed policy recommendation that includes a “policy deficiency” finding.	Command decision	None	Immediate
Adopt proposed policy recommendation that includes a “coaching / counseling” finding.	Command decision	None	Immediate
Add “training deficiency” finding which denotes the member did not violate policy, because they were not trained or there is a training gap that should be addressed department wide.	Command decision	None	Immediate

Recommendation	Steps Required	Financial Cost	Timeframe
<b>Personnel Management Systems</b>			
Remove Early Intervention System Administrator duties from the IA lieutenant responsibilities.	Command decision	None	Q3 2021
Designate an Early Intervention and Identification System coordinator and move the administration of EIS from under the Internal Affairs Unit in the Professional Standards Division.	Command decision	\$145,852	Q3 2021
Identify and implement a personal management system that can be tailored to collect pre-programmed criteria specific to SLPD agency needs and community expectations.	Command decision	\$50,000 to \$100,000	Q4 2021
Review categories for inclusion in data collection that could be useful as early indicators of potential problematic behavior (e.g. lawsuits and Traumatic Incidents).	Command decision	None	Q4 2021
Communicate in EIS policy the stated goals for the personal management system.	Command decision	None	Q4 2021
Replace the current method of data collection to a system that can be modified to capture data that supports the agency goals and purpose of a personal management system.	Command decision	None	Q4 2021
Provide agency wide executive led communication to agency personnel regarding personal management system goals, to include training on policy and/or system changes.	Command decision	None	Q4 2021

Recommendation	Steps Required	Financial Cost	Timeframe
<b>Employee Wellness and Mental Health</b>			
Create a steering committee of stake holders, to include clinicians, to make actionable recommendations to address the 2019 and 2020 officer survey.	Command decision	None	Immediate
SLCPD should identify ongoing funding for the Wellness Office training and program implementation.	Command decision	\$25,000 to \$50,000 *(2021 DOJ Cops Grant Available)	Q4 2021
Develop an executive led department wide plan to train all personnel regarding trauma, stress and PTSD for first responders from accredited behavioral science experts.	Command decision	None	Immediate
Use steering committee to research resiliency training for employees in high stress/trauma environments.	Wellness Office	None	Q4 2021
Measure outcomes of implemented education, programs, and strategies.	Wellness Office	None	Q4 2022
<b>Body Worn Cameras</b>			
Maintain current monthly body worn camera auditing procedures by supervisors.	Command decision	None	Immediate
Update body worn camera policy to include mandatory audits by supervisors.	Command decision	None	Immediate

<b>Recommendation</b>	<b>Steps Required</b>	<b>Financial Cost</b>	<b>Timeframe</b>
Conduct annual random small sample body worn camera audits to be conducted by the audits and inspections unit.	Command decision	None	Q1 2022
Post body worn camera compliance on the public website.	Command decision	None	Q1 2022
Add annual body worn camera audit responsibility to the police civilian review board (PCRB) responsibilities.	City decision	None	Q3 2021
The independent body worn camera auditor should review a minimum of 20 videos per month.	City decision	None	Immediate
Added responsibility for auditing use of force reviews should be included in the position.	City decision	None	Q3 2021
The position should be required to publish a bi-annual or annual report.	City decision	None	Q1 2022
Body worn camera review performance metrics should be established by working with the current Audit and Inspection unit within SLCPD.	Command decision and PCRB decision.	None	Q3 2021
<b>Memorandum of Understanding Between the City and the Police Association</b>			
Revise policy to enable supervisors to investigate and address low level complaints without violating agreed upon contractual rights.	Command decision	None	Immediate
Negotiate with the Salt Lake Police Association regarding wording and/or what is considered discipline at the lowest level.	Command decision	None	Immediate

## 2. Approaches to Mental Health Crisis Response

The analysis is tasked with completing a comprehensive review of current approaches to mental health crisis response, including an analysis of current demand for specialized response, and to develop alternative strategies to bridge the gap between specialized resources and unmet needs. Specifically, objectives of this analysis include the following:

- Review of current approaches to mental health crisis calls, homelessness, and other specialized responses.
- Develop a methodology to quantify the incidence and need for responses with a specialized CIT response.
- Based on the results of this analysis, analyze the feasibility of expanding the program to be able to reliably be available to respond to the vast majority of calls involving persons experiencing mental health crisis.

Computer-aided dispatch (CAD) data is central to this analysis, as it allows for the need or ‘demand’ for specialized response to mental health crisis events to be quantified, which is critical in determining what resources are needed to address any unmet needs. However, it is important to note that there are some limitations to this analysis. For instance, while CAD data can be used to document the types of calls that the CIT/HOST unit responded to, it is not possible to accurately identify calls that, regardless of whether CIT/HOST units responded to, involve a person experiencing mental health crisis. To this point, precisely identifying calls involving substance abuse can be even less reliable, particularly given the police department’s relatively limited role compared to Fire/EMS and other entities.

### (1) Overview of Current Approaches

SLCPD’s approach to mental health and homelessness centers around two units, one of which comprised of civilian clinicians and the other of specialized sworn positions:

Unit	# FTEs	Classification	Roles/Responsibilities
<b>Community Connection Center</b>	1	Director	<ul style="list-style-type: none"> <li>Created to connect individuals with services and operate a co-response model.</li> </ul>
	2	Manager	
	5	Case Manager	<ul style="list-style-type: none"> <li>Has evolved into walk-in facility that provides social and mental health services.</li> <li>Co-responds with CIT/HOST officers to calls involving persons experiencing mental health crisis.</li> </ul>
	3	Therapist	
<hr/>			
<b>CIT/HOST</b>	1	Sergeant	<ul style="list-style-type: none"> <li>CIT/HOST is part of the Community Connection Center effort.</li> <li>CIT Officers are classified as detectives, and work 0600 – 1600 Monday through Friday.</li> <li>CIT listens to radio and opts to respond to events involving person(s) experiencing mental health crisis.</li> <li>Provides security to social services workers that respond.</li> <li>HOST is a partnership between SLCPD and various service providers and community organizations to connect those experiencing homelessness to services.</li> </ul>
	4	Officer	

**(2) Identifying the Need for Specialized CIT/HOST Response**

The CIT/HOST team is on duty Monday through Friday from 6:00AM to 4:00PM (0000-1600). These hours are chosen for a few reasons, namely that they match with day shift hours, as well as to match the uptick in homelessness-related calls in the morning as businesses begin to open and residents are in transit.

As outlined earlier, identifying the calls that the CIT/HOST team responds to through computer-aided dispatch (CAD) data is not a straightforward process, particularly with the goal of examining their role in responding to calls involving persons experiencing mental health crisis.

There are not specific incident type codes or flags that correspond to events where mental health crisis is involved or the CIT/HOST team is specialized in responding to. Nonetheless, there are a number of related fields that often involve persons experiencing mental health crisis, such as “SUICIDE THREAT” or “PSYCHIATRIC PROBLEM VIOLENT”

but not all of the events under these type codes necessarily warrant or call for the expertise of CIT/HOST officers.

Examining the number of responses made by CIT/HOST personnel over 2019-2020 shows many call types that are not typically associated with mental health crisis events, as demonstrated by the following table:

**CIT/HOST Responses, Top 15 Incident Types**

	# CIT Responses	Avg. HT <sup>1</sup>
TRAFFIC STOP SLC	439	58.1
MISC BUSY STATUS	186	50.9
UNWANTED PERSON / TRESPASSER	154	66.9
ASSIST OTHER AGENCY	107	107.8
PSYCHIATRIC PROBLEM NON VIOLENT	107	111.7
PATROL CHECK	106	49.0
SUICIDE THREAT	91	149.5
PSYCHIATRIC PROBLEM VIOLENT	62	123.7
URGENT WELFARE CHECK	55	93.3
WELFARE CHECK	54	99.8
UNWANTED PERSON	47	76.9
SUPPLEMENTAL INFORMATION	37	57.0
SUSPICIOUS PERSON	33	68.5
TRANSIENT PROBLEM	30	31.4
LARCENY - SHOPLIFT	29	64.0

In many of these call types, such as “TRAFFIC STOP SLC” or “ASSIST OTHER AGENCY”, CIT/HOST responses represent a very small percentage of all the responses to those call types, with patrol units handling almost all responses. Thus, these call types are not reliable indicators for when CIT/HOST units are needed, nor as a proxy for identifying calls where mental health crisis is involved.

A central goal in this analysis is to model the demand for CIT/HOST crisis response, even in the hours in which they are *not* working. Consequently, isolating the call types that *most likely* correspond to the need for CIT/HOST units is essential. Certainly, not all call types with the “PSYCHIATRIC PROBLEM” prefix require CIT/HOST, but many do, and it can be

<sup>1</sup> Refers to handling time, which is defined as the time a unit is working on a particular call, from the moment they are dispatched to when they clear the call. It is expressed in minutes, and is not cumulative of additional units and the time they spend on the call.



assumed that similar rates of need for CIT/HOST units to respond in the hours for which they are not on duty as in the hours that they are on duty. In other words, if one-sixth of these calls required a CIT/HOST response during their on duty hours, then around one-sixth of those calls outside of those hours probably do as well.

In order to model the demand for mental health crisis response, the project team isolate the seven call types that most likely correspond to these events, based on the percentage of calls during CIT working hours (6a-4p) and workdays (M-F) that CIT responded too. They are as follows:

#### CIT/HOST Call Types Most Often Eliciting CIT Response During Working Hours

	CIT Response	No CIT Response	% w/ CIT Response
<b>Tier 1</b>			
PSYCHIATRIC PROBLEM NON VIOLENT	102	524	16%
SUICIDE THREAT	87	518	14%
PSYCHIATRIC PROBLEM VIOLENT	59	306	16%
SUICIDE ATTEMPT	5	29	15%
PUB PEACE - MENTAL/PSYCHO	3	3	50%
PSYCHIATRIC PROBLEM WITH A WEAPON	2	19	10%
PUB PEACE - TRANSIENT ACTIVITY	1	0	100%
<b>Tier 2</b>			
MISC BUSY STATUS	174	1,860	9%
UNWANTED PERSON / TRESPASSER	145	3,075	5%
PATROL CHECK	90	1,765	5%
URGENT WELFARE CHECK	53	1,090	5%
WELFARE CHECK	49	1,620	3%
TRANSIENT PROBLEM	23	2,423	1%
PERSON WITH A WEAPON	7	295	2%
BUSY STATUS INITIATED CALL	5	51	9%
SUICIDE INVESTIGATION	2	35	5%

Each of the call types within the first group, which will be referred to as 'Tier 1' calls in this analysis for the sake of simplicity, CIT responded to 10-17% of events that occurred within their working hours –higher than other call types, particularly those involving 10 or more calls per year.

Examining these events as a whole – regardless of whether CIT/HOST units responded to them – it is clear that they most often occur from around 11:00AM to about midnight, as shown in the following table:

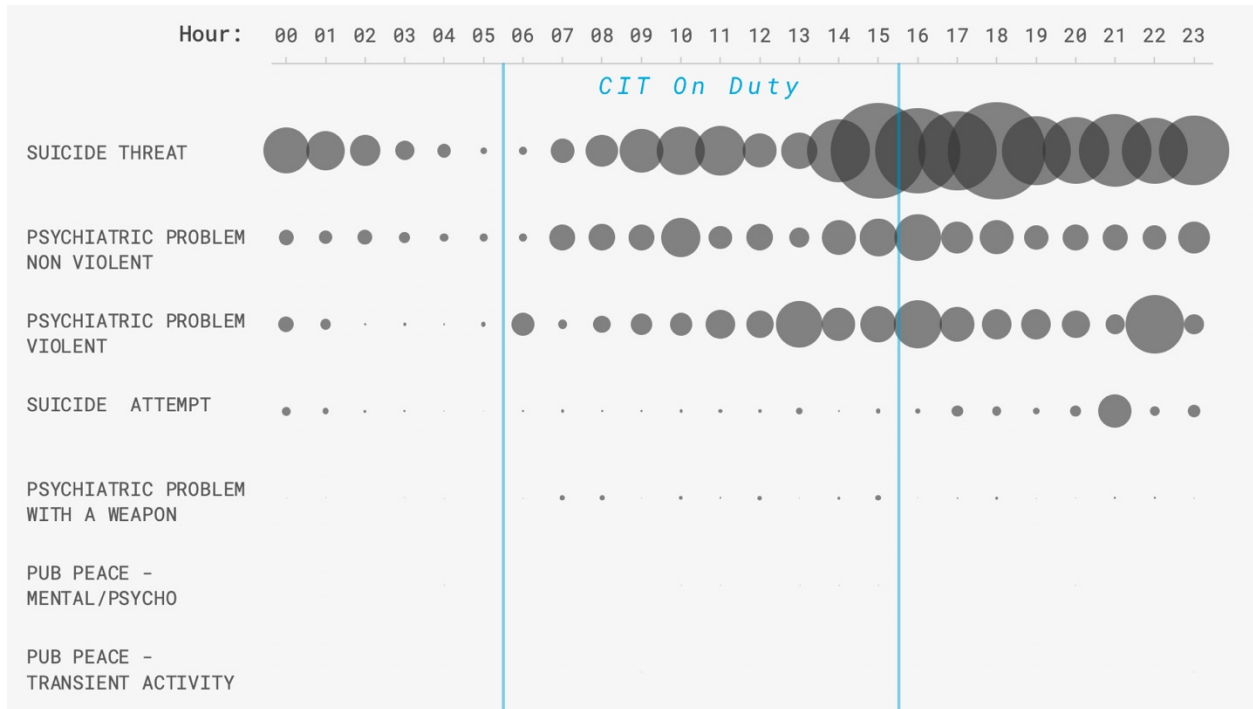
**'Tier 1' CIT/HOST Calls by Hour and Weekday (All Units)**

Hour	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
<b>12am</b>	36	29	36	25	29	28	24	<b>207</b>
1am	33	25	20	24	25	21	33	<b>181</b>
2am	22	19	26	17	22	16	18	<b>140</b>
3am	22	19	16	20	9	17	27	<b>130</b>
<b>4am</b>	13	21	9	15	18	10	10	<b>96</b>
5am	12	8	15	14	13	8	11	<b>81</b>
6am	12	11	13	21	10	14	18	<b>99</b>
7am	18	20	8	18	14	21	13	<b>112</b>
<b>8am</b>	22	27	21	29	24	21	19	<b>163</b>
9am	22	19	26	34	32	29	26	<b>188</b>
10am	34	28	26	35	37	31	36	<b>227</b>
11am	29	43	36	41	43	46	39	<b>277</b>
<b>12pm</b>	34	43	49	44	32	47	30	<b>279</b>
1pm	30	55	39	43	48	43	38	<b>296</b>
2pm	30	41	53	44	50	40	36	<b>294</b>
3pm	44	35	53	34	48	39	32	<b>285</b>
<b>4pm</b>	42	46	49	50	43	37	37	<b>304</b>
5pm	43	54	43	43	61	42	37	<b>323</b>
6pm	54	51	58	40	52	41	41	<b>337</b>
7pm	36	59	52	46	58	35	39	<b>325</b>
<b>8pm</b>	49	47	46	44	55	48	46	<b>335</b>
9pm	47	44	46	48	42	46	37	<b>310</b>
10pm	33	49	41	31	32	39	56	<b>281</b>
11pm	36	44	37	31	42	40	43	<b>273</b>
<b>Total</b>	<b>753</b>	<b>837</b>	<b>818</b>	<b>791</b>	<b>839</b>	<b>759</b>	<b>746</b>	<b>5,543</b>

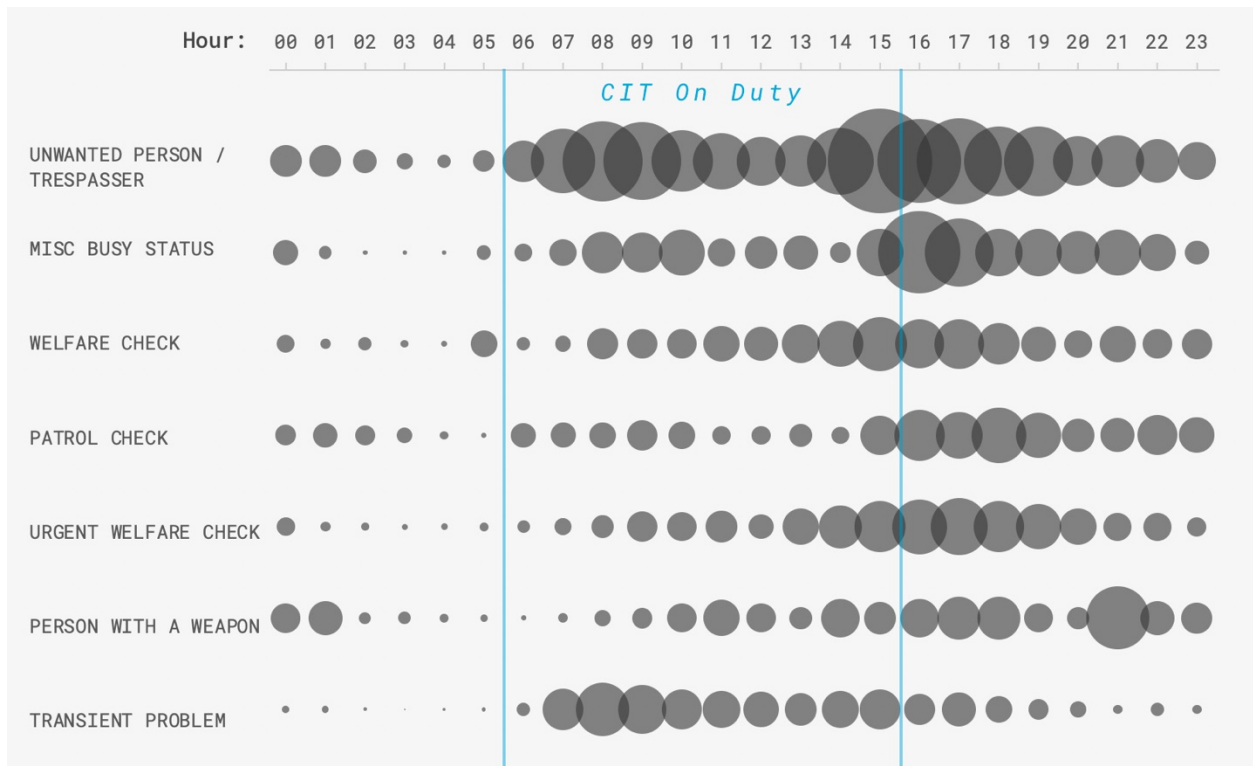
Importantly, the majority of these hours fall outside of the CIT/HOST working hours of 6:00AM to 4:00PM. Furthermore, the unit’s off days (i.e., when they are not working) of Saturday and Sunday are nearly as busy for these types of calls as the weekdays.

This distinction is especially evident when viewed as a chart showing workload by hour (including primary and backup handling time, as well as associated report writing time), with circles proportional to the number of hour:

**Tier 1 Call Types: Workload by Hour (All Units, 2019-2020)**



**Tier 2 Call Types: Workload by Hour (All Units, 2019-2020)**



Clearly, from a standpoint of the role of the CIT/HOST team in responding to events

related to persons experiencing mental health crisis, there is a mismatch between the hours in which CIT/HOST officers are deployed and the likelihood of these events occurring.

Recently, the Racial Equity Commission recommended that CIT expand to at least the afternoon shift hours. The evidence presented by this analysis strongly supports this conclusion. Furthermore, while matching day shift hours helps the unit to provide training to day shift personnel, this could also be done, even with perhaps with less overtime, if the hours were split across day and swing shift hours.

### **(3) Specialized Response Availability and Likelihood of Concurrent Calls**

The effectiveness of the co-response model depends in part on the availability of co-response to actually take place. If responders are not available, patrol will handle the calls without clinicians present and without the same level of training and specialization that CIT/HOST officers have.

In situations where it is not immediately apparent from the perspective of dispatchers that the call involves persons experiencing mental health crisis, it would depend on the sergeant or officers on scene to call for CIT/HOST. The more often that CIT/HOST is called for and they are not available to respond, the more reluctance could develop over time to call for those resources. As a result, it is critical that co-response be available as often as possible during the hours that they are on duty for.

To model this, the project team examined the ‘Tier 1’ subset of calls that may often involve or call for mental health crisis response, calculating the probability of two calls occurring concurrently. This is defined by two calls having handling times that overlap by any amount of time.

It is important to note that not all of these calls involve mental health crisis response, and even for the hours in which CIT/HOST is on duty, only around 15% actually involve a CIT/HOST response. Nonetheless, times where there is a higher prevalence of these types of calls would almost certainly involve a higher prevalence of mental health crisis response being needed. The following table provides the results of this analysis:

### Probability of Two Concurrent 'Tier 1' MH Calls Occurring an Hour

Hour	Sun	Mon	Tue	Wed	Thu	Fri	Sat
<b>12am</b>	16%	11%	16%	8%	10%	11%	10%
1am	13%	11%	8%	5%	10%	5%	10%
2am	8%	7%	8%	8%	6%	6%	8%
3am	3%	3%	3%	4%	1%	6%	8%
<b>4am</b>	8%	10%	3%	3%	5%	3%	5%
5am	2%	1%	8%	4%	1%	%	4%
6am	1%	2%	2%	6%	2%	1%	4%
7am	3%	3%	%	5%	3%	5%	3%
<b>8am</b>	1%	4%	4%	2%	7%	6%	3%
9am	4%	4%	6%	7%	9%	5%	7%
10am	11%	7%	8%	11%	12%	8%	9%
11am	7%	13%	13%	20%	17%	15%	14%
<b>12pm</b>	12%	17%	17%	13%	10%	15%	9%
1pm	11%	24%	14%	10%	18%	22%	19%
2pm	13%	20%	26%	13%	26%	21%	15%
3pm	13%	13%	18%	13%	19%	14%	9%
<b>4pm</b>	13%	20%	20%	15%	17%	13%	12%
5pm	19%	22%	18%	17%	28%	16%	13%
6pm	24%	22%	23%	13%	25%	17%	14%
7pm	18%	30%	28%	22%	29%	13%	18%
<b>8pm</b>	26%	24%	24%	19%	28%	18%	14%
9pm	27%	26%	25%	24%	22%	20%	18%
10pm	18%	23%	23%	20%	16%	20%	29%
11pm	16%	19%	17%	8%	21%	18%	22%

*The blue rectangle indicates the hours in which the CIT/HOST unit is on duty.*

As with previous analyses in this chapter, the chart demonstrates how critical it is that co-response from CIT and the Community Connection Center be available during the evening hours, where the likelihood of concurrent mental health crisis calls is almost always significantly greater than it is for the hours that those units are actually on duty.

Moreover, this also demonstrates that the hours where more than two sets of officers and clinicians be available is generally from around 1:00 PM to midnight or so. Before then, and particularly before 10:00 or 11:00 AM, only one set of responders likely needs to be available – nearly half of the time that those units are currently on duty.

#### (4) Implications of Current Research on Co-Response and CIT Models

Current academic research on the effectiveness of CIT and co-response models does not conclusively show effectiveness in either area:

- An expansive review of research conducted by Puntis et al (2018)<sup>2</sup> focused on the effectiveness of the co-response within the United Kingdom. The study did not find enough evidence to conclusively show whether or not the co-response model is effective, either in whole or certain aspects of the approach. A major limitation is how much variation there is in how co-response models are implemented and operated.
- Watson et al (2010)<sup>3</sup> found that CIT-trained officers responding to calls involving persons experiencing mental health crisis make arrests at about the same rate as non-CIT trained officers. CIT-trained officers do, connect individuals to services at a higher rate.
- Rogers, McNeil, & Binder (2019)<sup>4</sup> found that officers with CIT training improves officer satisfaction with their responses to mental health crisis calls, but there is no evidence to support that metrics such as arrest or use of force are diminished.
- Watson & Compton (2019)<sup>5</sup> also could not demonstrate with evidence CIT lowers outcomes such as arrest.
- Compton et al (2017)<sup>6</sup> found some statistically significant improvements in crisis response outcomes when individuals volunteer or self-select for CIT training, rather than departmentwide mandatory training. While the use of all physical force

---

<sup>2</sup> Puntis, Stephen, et al. "A Systematic Review of Co-Responder Models of Police Mental Health 'Street' Triage." *BMC Psychiatry*, vol. 18, no. 1, 2018, doi:10.1186/s12888-018-1836-2.

<sup>3</sup> Watson, A.C., Ottati, V.C., Morabito, M. et al. Outcomes of Police Contacts with Persons with Mental Illness: The impact of CIT. *Adm Policy Ment Health* 37, 302–317 (2010). <https://doi.org/10.1007/s10488-009-0236-9>

<sup>4</sup> Tully, Tracy, and Melissa Smith. "Officer Perceptions of Crisis Intervention Team Training Effectiveness." *The Police Journal: Theory, Practice and Principles*, vol. 88, no. 1, 2015, pp. 51–64., doi:10.1177/0032258x15570558.

<sup>5</sup> Watson, Amy C, and Michael T Compton. "What Research on Crisis Intervention Teams Tells Us and What We Need to Ask." *The journal of the American Academy of Psychiatry and the Law* vol. 47,4 (2019): 422-426. doi:10.29158/JAAPL.003894-19.

<sup>6</sup> T Compton, Michael et al. "Police officers' volunteering for (rather than being assigned to) Crisis Intervention Team (CIT) training: Evidence for a beneficial self-selection effect." *Behavioral sciences & the law* vol. 35,5-6 (2017): 470-479. doi:10.1002/bsl.2301

was somewhat more likely (including handcuffs and very low level force), individuals were more likely to be connected with services and less likely to be arrested.

It is important to stress that findings stating that there is not enough *evidence* to show that CIT and co-response models lower arrest and use of force do necessarily not mean that the programs don't have an effects on these outcomes – only that it can't be proven with available data collection methods. Likewise, there also is not sufficient evidence to prove that these programs don't work.

Consequently, even without evidence comparing the effectiveness of these approaches, it can be reasonably assumed that they both have some effect on interaction outcomes such as arrest and use of force. In an area of such urgent need, it is critical that the department continue to put significant effort into implementing these approaches.

It can be reasonably assumed that if the same set of officers are responsible for both CIT training and co-response to emergency situations, one could come at the consequence of another. An officer in the middle of an 8-hour training block may not be able to divert to a call in progress with no one else available, or the threshold for making that response could potentially be narrowed somewhat, hypothetically reducing the rate of response.

The co-response model has a significant advantage over the CIT model in that a clinician is also on scene, and provides the primary communication and field identification of underlying issues causing the behavioral incident. In a CIT model, by contrast, officers who are far less trained in these skills in comparison with a clinician are making that determination; while at the same time, they are handling all duties as a police officer responding to the crisis scene.

A key advantage of the CIT model, however, is that it is better able to spread out the training and guarantee an officer with CIT training is on scene, even if they are not fully specialized in that area.

#### **(5) CIT Initial Certification and Refresher Training Blocks**

The CIT/HOST unit plays a lead role in training new and current SLCPD sworn officers in the full crisis intervention training (CIT) course. Best practices for CIT training typically cap class size at around 30 individuals, with 40 hours for initial training and often 8 hours for refresher training. SLCPD currently does less than this, at 4 hours of *optional* refresher (recertification) training every two years.

- At current sworn levels, to retrain all sworn for 4 hours every two years would require 120 hours of class time across in total across 15 classes. This assumes a best practice of 30 per class.
- To address the deficiency versus best practices, 480 hours would be required – a significant investment of time that equates to 12 weeks, or about one-fifth of scheduled time on-duty per year.

Clearly, operating refresher training comes at a significant cost of staff time, to the point it affects the ability of the unit to be effective in the co-response model at current staffing levels, particularly if officers are spread across different shifts and workdays.

Initial 40-hour CIT training for all patrol officers (around 200) at the same 30-person class size requires 7 classes. However, this is not feasible due to the different shifts worked. 30 officers cannot simply be pulled from night shift at a time across the city and still maintain service levels in patrol. At 10-person class sizes, about 800 hours are required.

## **(6) Findings and Conclusions**

Considerations for addressing unit needs should take into account the number of different functions performed by the CIT/HOST unit. Specifically within the greater scope of the department's strategy for responding to mental health crisis events, the unit has several focuses:

- Respond to calls involving mental health crisis as a first responder or as backup, co-responding with an SLCPD mental health professionals out of the Community Connection Center.
- Train new and current SLCPD sworn officers in the full crisis intervention training (CIT) course.
- Provide optional CIT refresher training every two years for SLCPD sworn personnel.
- Proactively focuses on the top 20 most frequent users of 911, including EMS calls.

The totality of the CIT training requirements explored in the previous section show that, unless on-duty CIT/HOST staffing levels are above what is needed to handle all mental health crisis calls on the vast majority of days, these responsibilities come at the cost of the effectiveness of the co-response model. For example, if 2 CIT/HOST officers are on duty and one is busy providing training, and two mental health crisis calls occur



concurrently, it is possible that only one primary co-response is made to the pair of calls. At 4 CIT/HOST officers on duty, all of them being unavailable to respond in such a situation is extremely unlikely.

To this point, keeping CIT/HOST personnel all on day shift makes them more able to provide this training while still being able to perform the co-response model. The more officers that are on duty, the less likely the training responsibilities are to result in a co-response not being able to be made. However, as the analysis in this chapter has shown, the current practice staffing the entire CIT/HOST unit on day shift hours only significantly reduces their effectiveness in providing a viable co-response model.

These considerations all point to a single conclusion – with limited resources, SLCPD cannot pursue both the departmentwide CIT training model and the co-response to mental health crisis model concurrently. Giving both models equal weight and emphasis comes at the cost of both. Instead, SLCPD should prioritize implementing *one* model well.

The previously discussed findings of research conducted by Compton et al (2017) are relevant to this discussion, which found improvements in crisis response outcomes when individuals volunteer to undergo CIT training, rather than have it be compulsory for all patrol officers or departmentwide. This suggests that, in order to focus more on the co-response approach, the number of officers trained in CIT across the department could be reduced to just those in patrol or other relevant units that volunteer for the training, without sacrificing the outcomes ultimately achieved in the field.

The co-response model, given that it depends less on making broader organizational culture shifts to implement, can be reasonably assumed to provide a greater effect on achieving outcomes such as reduction of use of force and arrest in mental health crisis situations. Another primary strength of the model is that it centers clinicians that can focus solely on their behavioral health skillset, while not concurrently focusing on responding in the capacity of an officer to the scene of an emergency situation.

As a result of these factors, **the department should prioritize the co-response model over departmentwide CIT training.** While the initiative to provide CIT training for other sworn personnel – particularly patrol officers – should not be abandoned, it should not be conducted at the expense of the co-response model. Based on the incident occurrence data, during unit hours, two CIT/HOST officers should always be available to respond to mental health crisis calls. Scheduling decisions should be built around this objective, and not sacrificed to provide patrol officers with CIT training.

Given these considerations, the department should alter the deployment schedule for both CIT/HOST and Community Connection Center personnel. Some officers and clinicians should be staggered to cover afternoon shift (evening) hours, resulting in 20.5

hours of co-response availability per day. Additionally, some CIT/HOST and Community Connection Center personnel should work staggered workdays that cover Saturday and Sunday in order to achieve seven days per week of coverage, in comparison with the current five days per week. Shift differential incentives could then also be added as appropriate to ensure that these positions remained filled and to reduce turnover, given the relatively higher degree of specialization.

To make these changes possible while not eliminating the ability to provide CIT training for SLCPD sworn personnel outside of the unit, two additional officers should be added to CIT/HOST. Likewise, in order to make the expansion of coverage hours possible within the Community Connection Center's co-response ability, two additional staff should be added between the case manager and therapist classifications.

### **(7) Additional Considerations for Implementing Warm Handoff Approach**

Working toward the goal of reducing recidivism in criminal justice system and increase the likelihood of achieving better clinical outcomes, including survival and placement into long-term housing, there are a number of challenges that teams encounter. The changes to CIT/HOST and the Community Connection Center to focus on the co-response and case management model present opportunities to provide new types of services for those who are placed on involuntary holds or connected with inpatient treatment, that may address some of these challenges.

When individuals accept treatment or are placed on involuntary holds when needed, they are able to receive acute care and can have improved likelihood of better mental health outcomes. When they are released without a continuation of care, however, the likelihood of recidivism is extremely high, as individuals often return to the same environments that presented factors contributing to prior behavioral health crises. This risk is exacerbated by the sudden disconnect from care and connection to services upon release from treatment.

The warm handoff approach seeks to address these issues by ensuring that the release from a treatment facility does not represent a complete disconnect from the care provided. A mental health worker, or in this case, a Community Connection Center clinician, would meet with and pick the individual up from the treatment location and discuss the treatment plan details with the individual. They can assist the individual with setting up future appointments, locating ID or other documents needed for housing or other services, and even offer to provide transport to future appointments (e.g., treatment at a substance abuse clinic). At the time of release, the team can then offer to transport the individual to their desired location. A time at which the team can follow up with the individual by conducting a site visit can then be planned as well.

Critically, this also brings the crisis response team into the medical/mental health care team, as they would meet with the treatment facility staff and discuss their case and the specific aspects of their care plan. This information can then be logged in the team's records management system, where it can be pulled up later when making contact with the individual in the future. This additional role does add workload to the Community Connection Center staff, but this can be accommodated with existing resources, and particularly with the addition of one clinician position to the unit.

This is a key advantage of this approach, as it further orients the practice away from the criminal justice system by centering the civilian team within any plan for treatment that was discussed with the individual patient.

#### **Recommendation:**

**Adopt a warm handoff approach for individuals being released from treatment, where the crisis response team meets with the individual patient's clinical team and the individual to discuss care plan, set up appointments, and provide transport.**

#### **Recommendations:**

- **Prioritize the co-response model to mental health crisis response over other approaches.**
- **Shift CIT training for those outside of CIT/HOST to a volunteer/self-selection approach, and conduct the training as a secondary priority relative to meeting expanded co-response coverage needs.**
- **At current CIT/HOST unit staffing levels, the following deployment changes should be made to provide co-response during virtually all hours and days where mental health crisis calls most frequently occur:**
  - Two officers should be redeployed to afternoon shift hours (1430-0030, or 2:30 PM to 12:30 AM).
  - One CIT/HOST officer on each shift should work a staggered schedule that covers Saturday and Sunday.
  - Two clinicians from the Community Connection Center should be redeployed to afternoon shift hours (1430-0030, or 2:30 PM to 12:30 AM).
  - One clinician on each shift should work a staggered schedule that covers Saturday and Sunday.
  - The CIT/HOST sergeant should vary and stagger hours as needed to provide additional coverage to both sets of assignments.

- **Salt Lake City should consider offering pay incentives for both officers and clinicians working afternoon shift hours and weekends in order to be able to consistently fill these assignments.**
- **Increase the number of officers on the CIT/HOST team by an additional four authorized positions, resulting in a total of eight officers assigned to the unit.**
- **Increase the number of clinicians by an additional one authorized position, resulting in a total of eight case managers and therapists assigned to the unit.**
- **Adopt a warm handoff approach for individuals being released from treatment, where the crisis response team meets with the individual patient’s clinical team and the individual to discuss care plan, set up appointments, and provide transport.**

### 3. Core Policing Functions and Call Diversion Opportunities

#### (1) Identifying Core and Non-Core Functions of the Police Department

There isn't a single set of values or responsibilities that constitute the 'core' functions of a police department. Those functions that are considered to be core, and thus represent functions intrinsic to the role of law enforcement and what a police department does on a day-to-day basis, vary over time as perception and issues change. Suppression of crime, for instance, may have been seen as more central to police mission in decades prior when crime rates were significantly higher throughout much of the country, where issues of public trust and legitimacy have risen to the forefront in recent years.

Regardless of these issues, the core functions of police department could thought of as to:

- Respond to calls.
- Investigate crimes.
- Suppress and prevent crime.
- Operate support services and administratively operate effectively as an organization.
- Maintain public trust and legitimacy.

Every unit within the department can be categorized under one of the first four values, with the latter one, involving public trust and legitimacy, interfacing with all aspects of policing.

#### (2) Recent Efforts Taken to Re-Examine Police Services in Other Departments

Throughout the United States over the past year, intense focus has been placed on reforming how police department resources are organized, how they operate, and whether some functions should be served through alternative means, such as outside entities. The efforts for reform largely fall into the following categories, with more common or more *notable* changes being made highlighted as examples:

- **Reallocation of resources away from or to certain functions that act proactively.** Over the past year, particular focus has been placed on the units, which some view as 'discretionary'. However, if it is assumed that suppression and prevention of crime is a core policing function, then the question is how much of an allocation

should be made to these types of activities, and what types of activities should they look like? Recent reforms – including those that are proposed, enacted, or are being implemented – largely fall into two categories:

- **Augmenting staffing or creating new community policing and/or outreach units.**
  - **Reducing, eliminating, or shifting focus from specialized enforcement units.**
  - **Reducing police funding or shifting funding to other agencies and programs, such as in Austin (\$31.5m) and Seattle (46m), mostly resulting from the elimination positions that were vacant.**
- **Changes to policies and practices, such as:**
    - Banning or limiting the use of certain uses of force, such as carotid restraints (chokeholds) or tear gas in crowd control situations (SLCPD already does not allow for use of CS gas).
    - Berkeley, CA recently limited traffic stops for offenses deemed to be low level, such as expired registration tags or seatbelt. Legislation similar in scope was recently proposed in Minnesota House of Representatives.
    - Maryland recently passed sweeping legislation to limit certain types of force used, as well as a repeal of the state’s Police Bill of Rights.
    - New York City approved reforms that, among other changes, create a new disciplinary matrix.
  - **Diversion of calls normally handled by patrol units to civilian responders** either in outside agencies or within the police department.
    - Many agencies throughout the country already do this, with civilian responders handling minor, low-priority calls for service.
    - Ithaca, NY recently approved measures to shift responsibility for certain types of call responses to a newly created civilian agency.

Diversion of calls away from sworn law enforcement response in the field, in particular, has been critical avenue in which many cities have been examining and re-imagining the role of police in. In the case of Salt Lake City Police Department, it is an avenue already been explored through alternative call handling means such as online reporting, but not through other methods that are common around the country, such as civilian field responder programs.

This provides an opportunity for this analysis to examine if such a program could provide benefits to the department and the community, if it would be feasible, and how it would be staffed and operates. The following sections examine these issues.

### (3) Background and Objectives of Call Diversion

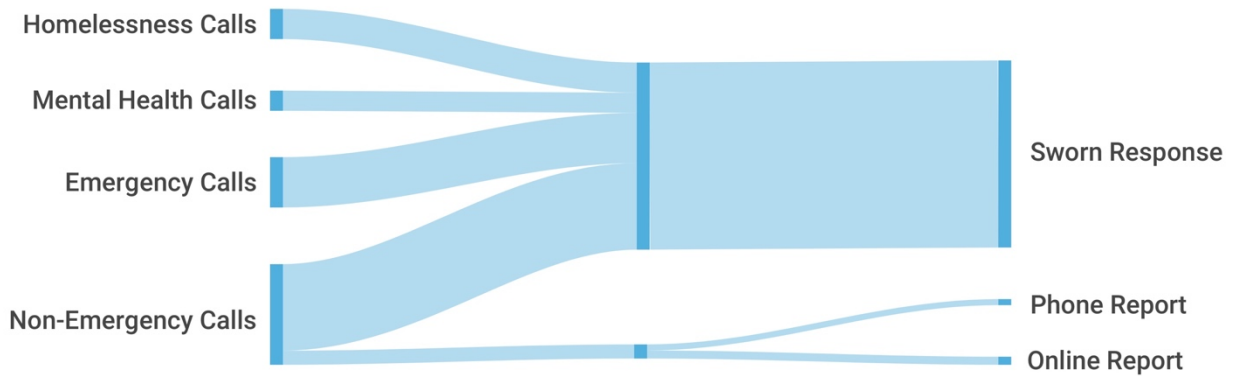
In recent years, more and more has been asked of police officers. Police have been called to function in social work capacities in responding to issues of homelessness, intervene in situations involving persons experiencing mental health crisis, and serve numerous other roles beyond what was expected in the past.

At the same time, service level expectations have not diminished. Perhaps more than ever, police have been asked to respond to minor, non-emergency calls such as non-injury accidents, and calls that simply do not need to be not law enforcement matters.

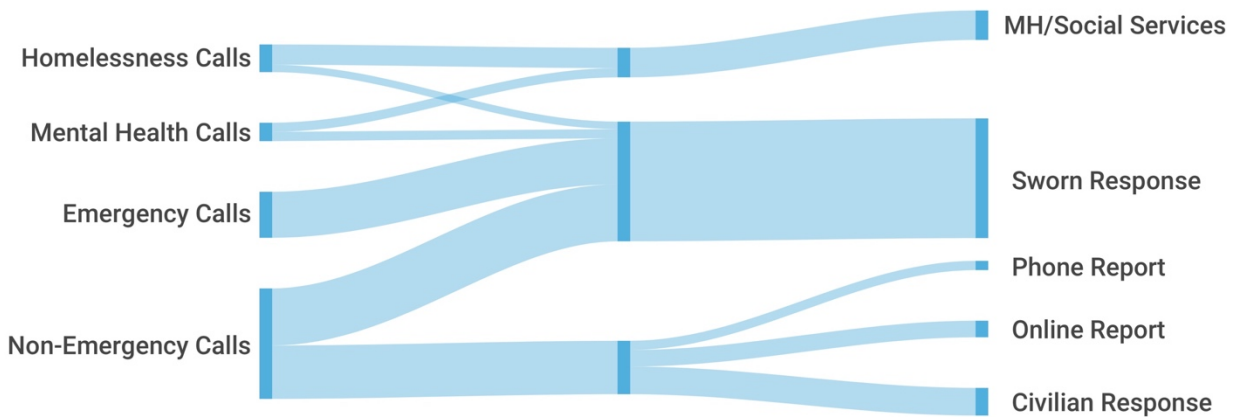
Although this analysis focuses on the establishing a civilian field responder classification to handle low-priority calls for service, it is critical to stress that this is part of a greater picture of call diversion. Reducing police workload involves using not only civilian field responders, but emphasizing and expanding phone and online reporting, as well as using other city agencies and non-profit organizations to handle certain types of calls, particularly those with a social services nexus, such as those relating to mental health or the experience of homelessness.

The following pair of diagrams provide an illustrative model for how call diversion can reduce the involvement of police in handling certain types of workload, handling those calls through other means instead:

**Before Implementing Call Diversion Approaches**



**After Implementing Call Diversion Approaches**



As this illustrative framework shows, an array of different categories of calls for service can be diverted different approaches. When several different approaches are employed in unison, each approach is able to divert its own portion of calls that it is most equipped to handle. Some, such as phone and online reporting mechanisms, involve generally the same types of calls, but provide multiple options for individuals in the community to make the report that they are most comfortable with.

Diversion does not inherently reduce the level of service. In many cases, a sworn response does not necessarily add value over alternative approaches. For instance, in responding to calls centered around homelessness and mental health issues, a specialized social services responder or mental health clinician would have significantly more training and specialization in handling that call appropriately and effectively. In the case of relatively



minor, cold (i.e., past-tense) property crime reports, such as the theft of a bike, many community members would prefer to make an online report over all other methods, given that waiting for a sworn response could take up a significant amount of their time.

#### (4) Best Practices for Operating Call Diversion Approaches

In order to maximize diversion opportunities, a number of principles should be kept in mind:

- For field response (e.g., mental health/social services, civilian responder), **the process of requesting and receiving service should be functionally identical** to that of a sworn response from the point of view of the caller.
  - In other words, there is one point of contact for the caller (911 or non-emergency line), and it is not incumbent upon the caller to be aware of multiple options and how to contact the correct resource. Decisions on which type of resource should respond should be made at dispatch.
- **The types of calls that are eligible for alternative reporting should be intuitive and based on a common set of characteristics**, whether for civilian response or for online and telephone reporting.
  - If the eligibility criteria for diversion are that there are no suspects, that it occurred in the past-tense (i.e., cold report), does not involve a dispute, and is non-violent, for instance, then all common call types that fit that description should be included.
- **The department should evaluate current alternative response and reporting methods on a regular basis and set goals to grow the share of calls that are diverted** through those means, and develop strategies to realize those goals.
- **Efforts must be made to advertise telephone and online reporting services.** Importantly, advertisements on billboards, in local newspapers, and other media outside of local government communication channels, are some of the most effective means of reaching as broad a spectrum of community members as possible.
- **Availability must be maximized for alternative reporting methods.** Online reporting should be available at all times, and telephone reporting should be available seven days per week, for as many hours as possible.
  - It is particularly important that the services be available both before and after the most common working hours, as many of the types of reports that are eligible have significant upticks at these times.

- For instance, auto burglaries can often be discovered when the victims are going to work, and cold burglaries are frequently called in when the victim returns home from work.
- If individuals make attempts to use the telephone reporting system but are not able to, they will be increasingly likely to give up and not try using it again in the future.
- **For online reporting, it is critical that investments are made in enhancing the user experience.** The interface used and process of filing a report online should be intuitive, approachable for a wide array of computer proficiency levels, and take as little time as possible.
  - Additionally, searching for and navigating to the online reporting page should be facilitated.

SLCPD provides an excellent example of an easy-to-understand menu of the different call types that are eligible for online reporting, with toggleable headers and a short list of questions to determine whether the report can be filed online.

**If you can answer YES to all of the below questions, you are ready to file your report online.**

- This is not an Emergency?
- This incident occurred within the Salt Lake City jurisdiction? [View maps](#)
- This did not occur on a state highway?
- You have a current email address, that you check regularly, to find out if additional information is required or your report has been accepted.

If you answered NO to any of the questions please look at our frequently asked questions section.

Start by choosing a category from those listed below.

+	Special Needs Registry
+	Bike Registry
+	Credit or Debit Card
+	Harassing Phone Call
-	<b>Hit and Run</b>
Select this category to report a "Hit and Run" accident if there are no injuries or no witnesses.  <a href="#" style="text-decoration: underline;">Click to Start Report</a>	
+	Identity Fraud

*Screenshots of two elements of the SLCPD online reporting landing page.*

By implanting best practices to increase awareness of the services, make those services easy to use, and ensure that as many types of events that can be safely and effectively handling through alternative means are eligible, the share of calls that are diverted will increase further. *The effects of maximizing call diversion are clear:* Officers have more time to be proactive and engage with the community, and community members receive quicker response times and take less time filing reports for minor, non-emergency issues.

#### (5) Methodology Used to Determine Calls That Can Be Diverted to Civilian Response

To determine the number of calls that could feasibly be handled by a civilian field responder, the project team examined two years of computer-aided dispatch (CAD) data, covering the 2019 and 2020 calendar years. The data shows all responses made to calls, as well as information about those responses, such as when it occurred, how long it took to handle, and the incident type under which the call was categorized as.

Our analysis of the potential for workload to be diverted to alternative call responders begins with the totality of unique community-generated calls for service handled over the year of data used for the study, which is then analyzed by incident code. Incidents are then filtered for eligibility in a call diversion program using the following process:

- 1) Specific call types are selected that are diverted to civilian and alternative response means in other departments around the country, such as minor non-injury accidents, petty theft reports, cold burglary reports, and low-priority calls relating to the experience of homelessness that do not pose a reasonable degree of risk to the responder.
- 2) Based on the call type and the experience of the project team, estimates are developed for the percentage of calls that a civilian would be able to handle safely and effectively without the assistance of a sworn officer. Important to this are inferences made in terms of how SLCPD classifies incidents compared to other jurisdictions, such as whether the CAD system uses categories that are broader and more inclusive of a wider range of events and associated severity.
- 3) Workload hours diverted are then estimated based on average primary unit handling time for the incident, as well as a pro-rated estimate of report writing time associated with the call.

Confidence levels vary somewhat by call classification, and the estimated percentages of calls that could be handled by a civilian vary based on this degree of certainty. This is done in part by examining the context of other call types. For instance, if residential burglaries are divided into the call types “BURGLARY”, “BURGLARY JUST OCURRED”, and

“BURGLARY IN PROGRESS”, it can be assumed that the “BURGLARY” call type without the suffixes refers to cold burglaries, at least for the vast majority of the time.

The same reasoning is used for traffic accident calls, where the existence of specific call types for accidents involving injuries, which could not be handled by civilians, infers that the base call type predominantly includes calls that do not involve any injuries, and thus are more likely to be able to be handled by a civilian field responder.

## (6) Results of the Feasibility Analysis

With the distinctions raised in the previous section in mind, the following table provides the estimated number of calls for service that can be diverted by incident type, which have been labeled with our own categories for the types of workloads being diverted:

### Estimated Potential for Calls for Service to Be Diverted to Civilian Responders (2019 Data)

	# Calls	% Diverted	# Diverted	Hours Diverted
<b>Cold Reports</b>				
THEFT	5,042	60%	3,025	6,465
BURGLARY	949	90%	854	2,113
BURGLARY FROM A VEHICLE	654	100%	654	1,239
VANDALISM	1,127	50%	564	1,077
<b>Homeless</b>				
TRANSIENT PROBLEM	1,232	90%	1,109	960
<b>Traffic</b>				
TRAFFIC ACCIDENT INFORMATION	6,296	100%	6,296	12,954
TRAFFIC HAZARD	1,527	85%	1,298	954
PARKING COMPLAINT	380	100%	380	334
ABANDONED VEHICLE	74	100%	74	82
TRAFFIC ACCIDENT JUST OCCURRED	120	40%	48	119
<b>Total Diverted Calls</b>			<b>14,303</b>	<b>26,297</b>

2019 data is used given the unique service environment changes brought by the COVID-19 pandemic. It is reasonable to assume for the purposes of determining staffing needs that workload in 2022 and beyond will more closely resemble 2019 than 2020.

The potential for over 14,000 calls for service to be diverted per year represents a significant portion of the total calls handled by the department. To estimate how this affects patrol service levels, an assumption can be made that patrol proactive time<sup>7</sup> is around 30-40%, and that out of each officer's 2,080 work hours per year, and after deducting for leave, training, administrative time, and other factors, that officers are on-duty and available for 1,640 hours per year each year (after factoring in leave, training, etc.). Given that the scope of this analytical effort does not include a comprehensive review of patrol workload and staffing, these proactive time and availability assumptions have been used to serve as a proxy for 'typical' values for large police departments. Under these assumptions, the diverted calls represent the equivalent workload of approximately 25-29 officers.

However, this should not be thought of as a means to reduce patrol officer staffing. Instead, the primary advantage of implementing call diversion through civilian response is to free up officers to be more proactive and more engaged with the community, while improving response times to lower-priority calls that do not require sworn response.

#### (7) Analysis of Civilian Responder Staffing Needs

To staff such a program, it is first necessary to develop net availability assumptions for the civilian community service officer (CSO) classification. Out of the 2,080 work hours per year, CSOs would be on duty for slightly more hours in a year than officers, given that civilian leave allowances are generally less than their sworn counterparts. The following table provides these calculations:

##### CSO (Civilian Responder) Estimated Net Availability

Base Annual Work Hours		2,080
.....		
Total Leave Hours	-	270
On-Duty Training Hours	-	20
Administrative Hours	-	113
.....		
<b>Net Available Hours Per CSO</b>	<b>=</b>	<b>1,677</b>

<sup>7</sup> **Proactive time**, also referred to as uncommitted time, is the percentage of on-duty time left after handling community-generated call for service workloads and administrative responsibilities. During this time, officers may self-initiate activity such as traffic stops, engage with the community, break in between handling calls, or anything else that is not responding to a call or handling administrative duties.

Administrative hours are calculated at 45 minutes per shift, and include meal breaks and beginning/end of shift activities and other non-workload duties.

While CSOs do not need to be staffed for a certain proactive or uncommitted time level, it is not realistic to expect them to have call responses lined up back to back throughout the shift, for every shift they work. As a result, it is estimated that CSOs are utilized (responding to calls) 85% of their net available time on duty. This factor is used to calculate staffing needs based on the number of hours that need to be staffed for (hours on duty utilized + hours on duty non-utilized). A turnover factor is also applied in order to account for vacancies as they occur at a typical rate. The result of these calculations is then rounded up to the nearest whole number.

#### Calculation of CSO (Civilian Responder) Staffing Needs (2019 Data)

Net Available Hours Per CSO	1,677
Total Workload Hours	26,297
% Utilization	85%
<i>Total Hours to Staff</i>	15.0%
Net Available Hours Per CSO	30,938
Turnover	5.0%
<b>CSO Positions Needed</b>	<b>20</b>

It is assumed that among the 20 positions are CSOs working in a lead capacity that would function as field supervisors and report to the patrol lieutenant on duty for their assigned district.

#### Recommendations:

**Establish a new civilian field responder classification, Community Service Officer (CSO), that handles lower-priority calls for service that do not require a sworn officer to respond.**

**Add 20 new full-time positions under the new Community Service Officer (CSO) classification. The additional cost of this would be about \$1,602,720 in salary and benefits at 67% of the compensation of a police officer.**

## 4. Employee Discipline and Personnel Management

The Matrix Consulting Group was tasked with analyzing current practices, policies and procedures of the Salt Lake City Police Department in several key areas contained in the Operations scope of work. This **draft** report documents these findings as they relate to internal affairs and disciplinary processes; employee support, intervention and wellness programs; and body worn camera reviews.

Where appropriate the project was tasked with identifying best or prevailing practices. In the past few years, and especially in the past year, targeted practices have been changing greatly in law enforcement. As a result, in conducting this analysis, we used the following definitions:

**Best Practice** – A practice considered by a majority of departments typically also recommended by professional associations like the International Association of Chiefs of Police (IACP), Police Executive Research Forum (PERF), CALEA or similar association.

**Prevailing Practice** – A practice that is commonly used but may not have formal recommendation from a professional association.

**Emerging Practice** – A practice that is not widely adapted but is promising because it addresses an identified issue or is meant to improve operations. An emerging practice is most often associated with new practices or procedures.

It is important to note that all three can be impacted by the size of a department or available resources. To conduct our analysis, when comparisons are needed, we compared practices with similar sized or larger agencies.

### 1. Analysis of Internal Affairs Process and Structure

Internal Affairs is a unit within the Professional Standards Division. Which is led by captain. Internal Affairs (IA) is comprised of one lieutenant and three sergeants. The unit investigates complaints against officers, monitors the complaint process, operates the early intervention system (EIS). The Captain's position is transitioning to a civilian director.

To conduct this review the project team reviewed current SLCPD IA Policy 1000 and the proposed "in progress" recommended policy changes, the CPRB Code, IA policies from

other departments, the IA statistical databases for 2019 and 2020 and conducted staff interviews.

The Salt Lake City Police Department is an accredited agency through the Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA) and all policies are reviewed by Lexipol, a leading police policy vendor.

Though the focus of this review section is of the internal affairs process and structure it is important to understand that even if the internal affairs process is fully functional, policies that underpin police accountability must be up to date and best practice. The most important of these is police use of force and reporting policies. Use of force is covered under SLCPD Policy 300 Use of Force. To perform this analysis the project team reviewed the most common emerging policy practices from law enforcement and those from civilian accountability groups that are pushing for police use of force reform. The policies reviewed included the following:

SLCPD policy 300.10 **Use of Force Review** –requires supervisors to respond to scene and to conduct an administrative review of use of force.

SLCPD policy 300.2.2. **Duty to Intercede** –dictates officers “shall” intercede when they see force that is clearly beyond that which is objectively reasonable.

SLCPD policy 300.5 **Verbal warning before use of deadly force** –policy states “A verbal warning should precede the use of deadly force where feasible.”

SLCPD policy 300.5.1 **Shooting at moving vehicles** –states shooting at moving vehicles is “generally prohibited.”

SLCPD policy 302.12. **Ban on the use Choke holds-** states Carotid Control and Choke Holds are not permitted.

SLCPD policy 300.3.1 **De-escalation** –policy states when circumstances permit, officers “must” use strategies and techniques to decrease the intensity of a situation.

SLCPD has updated use of force policies that meet emerging areas of suggested reform.



## Internal Affairs Policy

Internal affairs operations are covered under SLCPD Policy 1003- Complaints Against Personnel and Disciplinary Action. During this study, the project team was informed that Policy 1003 was under review and that a working group was updating the entire policy. To conduct this review both the current and proposed policy changes were reviewed. The current internal affairs policy and processes are very consistent with other agencies and contain best practices in several areas. SLCPD has the following best practices:

- They accept complaints from a variety of sources including:
  - An individual or group.
  - Third Party
  - Government Agency
  - Anonymous
  - Department Members
  - The Website
- All complaints are accepted.
- All complaints are tracked in a database.
- There is a set timeline of 75 days to conduct the investigation.

These best practices ensure that the department receives all complaints and that all complaints are reviewed. The SLCPD complaint process differs from most agency complaint process in that there are concurrent investigations on use of force complaints from both Internal Affairs and the Police Civilian Review Board (PCRB). Also unique to SLCPD is that use of force complaint findings are conducted independent from each other so that the PCRB and the SLCPD may have different findings on the same case.

There is close coordination with the PCRB Investigator and IA with current investigations and the PCRB Investigator has full access to SLCPD databases and investigative materials. This is an emerging practice that provides an independent “third party” review of important documents, interviews and other evidence.

There is no current policy that mandates investigations continue when an employee leaves service, however SLCPD is in the process of changing this and it is becoming current practice pending the adoption of a new policy. This would be an emerging practice and likely best practice in the near future as more departments adopt this

approach. This change will help keep officers who failure to perform at one agency from moving to other departments before investigations are complete that would likely remove them from consideration at other departments.

Internal Affairs policy allows other agencies to review personnel files including IA investigations (with a signed waiver) for purposes of conducting background investigations. This has been the practice and is consistent with best practice.

### **Internal Affairs Process**

The following description encapsulates the current IA investigative process:



The entire investigation is mandated to be concluded within 75 days by the MOU between the Salt Lake City Corporation and the Salt Lake Police Association unless there are extenuating circumstances.

This process is very similar to other larger west coast and mountain state agencies that we reviewed including Bakersfield, Boise, Denver, Portland, and San Diego. In spite of that, Salt Lake City is the only municipal police agency we found that has a member of their city's human resources department present at employee interviews. One noted benefit

associated with this practice, is that it allows Human Resources to be involved with important details of the investigation so that decisions could be better defended.

As stated previously, the current process is being updated to include more involvement and notifications to division commands on investigations at the division level on minor or less serious complaints.

The updated process will remove the findings task from Professional Standards Captain requiring division captains to write findings. The concept behind this move is to keep division commands more informed about employee misconduct under their command. This is an established practice in many larger police agencies. Though this change will accomplish this, it may come at a cost of consistency in findings and discipline. The current process of having the IA Captain write findings for serious misconduct complaints ensures some consistency in how findings are rendered whereas two captains reviewing the same complaint may result in two different outcomes with the same fact pattern established.

SLCPD uses a 3-category process to determine the seriousness of complaints. Category 1 is the most serious category which includes the following allegations:

### **Category 1 Allegations**

- a. Improper exercise of police authority.
- b. Misconduct pertaining to alcohol, drugs and or/sex.
- c. Harassment or Threats.
- d. Failure to take appropriate police action.
- e. Inappropriate use of force.
- f. Assault by an officer or other Department member.
- g. Improper handling of evidence.
- h. Unlawful or inappropriate search and/or seizure.
- i. Unlawful or inappropriate arrest.
- j. Civil rights violations.
- k. Criminal conduct by an officer or Department member.

### **Category 2 Allegations**

- a. Personal Contacts.
- b. Rudeness.
- c. Profanity.
- d. Improper use of equipment.

- e. Improper vehicle impound.
- f. Police Traffic or parking violations.

### Miscellaneous Files (M-Files)

M-Files are complaints or information received that are not investigated due to the lack of specific information required for investigation, or are so minor in nature that they can be handled by an initial inquiry at the Division level.

### Discipline Process

The Disciplinary Process is covered under SLCPD policy 1003.13 -Disciplinary Action. The current process uses a tier-based system that assigns discipline based on the Tier (Seriousness of the policy violation). The system has three tiers which are listed below:

<b>Tier 1</b>	Counseling and/or Training. Written warning.
<b>Tier 2</b>	Unpaid suspension of 24 hours or less.
<b>Tier 3</b>	Unpaid suspension of greater than 24 hours. Demotion Termination

Additionally, there are several mitigating factors that must be considered before discipline is imposed. While a tier system helps to define the seriousness of complaints it can be subject to variance in outcomes e.g., two officers could be found in violation of policy that falls under tier 2 but could have different captains recommend different hours of suspension. The result is that one captain could recommend 8 hours off while the other could recommend 24 hours off for the same policy violation under the same tier.

To make proposed discipline more consistent many departments are moving to a discipline matrix with prescribed recommended discipline for several policy violation categories. One discipline which the Matrix Consulting Group reviewed was from the Denver Police Department which had several stated goals including defining conduct categories and setting discipline levels to identify a fair and reasonable presumptive penalty for each discipline level. Though the Denver Police discipline matrix is extensive, it does set prescribed discipline levels for policy violations that are consistent. Additionally, it allows for more aggressive discipline to be imposed for subsequent policy violations within certain time limit parameters.

The benefit of a discipline matrix is that it provides a higher degree of consistency for discipline and it provides a consistent mechanism for increased discipline for repeated violations up to and including termination. A sample discipline matrix is presented below:

### Sample Discipline Matrix

Offense Class	First Offense		Second Offense		Third Offense	
	Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
1	N/A	Supervisor Counseling	N/A	Written Reprimand	Supervisor Counseling	1 Day Suspension
2	Supervisor Counseling	Written Reprimand	Supervisor Counseling	1 Day Suspension	Written Reprimand	3 Day Suspension
3	Supervisor Counseling	1 Day Suspension	Written Reprimand	3 Day Suspension	1 Day Suspension	5 Day Suspension
4	Written Reprimand	3 Day Suspension	1 Day Suspension	5 Day Suspension	3 Day Suspension	10 Days or Demotion*
5	1 Day Suspension	10 Days or Demotion	3 Day Suspension	10 Days or Demotion	10 Days or Demotion	Termination
6	10 Day Suspension or Demotion	Termination	10 Day Suspension or Demotion	Termination	Termination	N/A
7	Termination	N/A	N/A	N/A	N/A	N/A

As can be seen by the sample matrix above there are more categories varying degrees of severity of policy violations and there are pre-set elevations for second or third offenses. The use of a discipline matrix can assist in making consistent discipline decisions. The matrix is used before a pre-disciplinary hearing.

During the course of this study, it was learned that an SLCPD working group is considering a discipline matrix to attempt to make the discipline process more consistent along with other changes. Moving to a standardized discipline matrix is an emerging trend in larger law enforcement agencies.

One important departure at SLCPD from standard discipline systems is the lack of documenting verbal counseling, though SLCPD supervisors can conduct coaching and

counseling. SLCPD Policy 1003 outlines the process for a written warning, but there is no verbal counseling component which many departments have. Documented verbal warnings and written warnings are important supervisory step so that employee behavior can be addressed at the lowest level. Through numerous interviews it is apparent that supervisors are addressing low level issues through verbal counseling, but due to constraints of the current process as outlined in Article 15 of the MOU between the Salt Lake City and the Police Association these are not documented it because it falls under discipline which would require a pre-determination hearing and significantly more effort for very low-level issues. The department does have the ability to administer performance improvement plans.

A more effective system would include the ability of supervisors to document written warnings or verbal counseling without invoking a pre-determination hearing. This is important because of the transitory nature of police work where supervisors and officers can move from shift to shift or into other work units. Without proper documentation a new supervisor may be unaware that an issue had already been addressed by another supervisor. This new supervisor may try to address the same issue at the same low level with undocumented verbal counseling when it may be more appropriate to raise the seriousness of the allegation because the problem behavior is continuing. This discipline gap should be addressed by added documented counseling as non-discipline for minor allegations.

### **Conclusion of Administrative Investigations**

SLCPD policy 1003.10 identifies possible outcomes from the conclusion of Administrative Investigation. Those outcomes are:

- a) **Exonerated** – The alleged incident did occur, but the actions of the member were justified, legal and proper.
- b) **Sustained** – The investigation disclosed sufficient evidence to prove the allegation against the member, and the member's action(s) are in violation of policy and/or procedure of the Department and/or City.
- c) **Not Sustained** – The investigation failed to disclose sufficient evidence to clearly prove or disprove the allegation.
- d) **Unfounded** – The alleged incident did not occur.

These four findings are effective for most possible investigative outcomes, however there are other possible outcomes that could also prove useful to improving the department and employee behavior. Two additional findings that should be considered would policy deficiency training deficiency. Policy deficiency would denote the actions were not of

policy because no policy exists to address the specific action. A training deficiency finding would denote the member did not violate policy, because they were not trained or there is a training gap that should be addressed department wide. Adding these two additional categories assist the department in making training or policy improvements when random events or new trends occur that are not addressed in policy or training.

### Internal Affairs Historical Data

Policies and procedures identify processes, but not outcomes of processes. To evaluate IA process outcomes the project team reviewed 2019 and 2020 IA complaint data. In 2020 there were a total of 161 IA investigations completed. The following tables indicate the number of each type of case by seriousness:

#### 2020 Internal Affairs Complaints

Case Type	# of Cases 2020	# of Cases Sustained	%
Category 1	39	14	10%
Category 2	39	8	21%
Complaint	9	0	0%
Intelligence	1	1	0%
M-File (minor)	73	3	4%
<b>Total</b>	<b>161</b>	<b>15</b>	<b>9%</b>

As the table indicates approximately 9% of complaints received are sustained. This is consistent with other studies the project team has conducted. This is no national standard for how many complaints are sustained but it is quite common to have less than 15% sustained.

One indicator of internal police accountability is the number of internal complaints filed. Internal complaints indicate that officers and supervisors are holding each other accountable for violating policy. The table below shows the number of internal complaints versus external complaints from the 161 complaints filed in 2020.



## 2020 Internal Affairs Complaints

Case Type	# of Cases 2020	%
External	90	56%
Internal	71	44%
<b>Total</b>	<b>161</b>	<b>100%</b>

As the table indicates internal complaints are approximately 44% of all complaints investigated in 2020. This is a very high level of internal complaints and indicates employees are held accountable internally as well externally.

### Transparency

Police transparency is an important aspect of police-community relations. SLCPD does publish use of force data on its webpage however there is no data for complaints published. The use of force data lacks some demographic information. Publishing complaint and investigations data on the public website could help inform the public that SLCPD actively investigates complaints. The publishing of this data can help alleviate mistrust between the police department and the community they serve by being transparent, especially important when they have internal data than can indicate how well they are doing.

The Columbus (OH) Division of Police publishes an extensive annual report which is posted on their website that includes:

- The number of complaints received.
- The outcomes.
- Breakouts by gender and race.
- Use of force statistics.
- Internal versus External Complaints.

Updating SLCPD polices to include the publication of these performance metrics can help the community better understand how well the department is performing. This information is readily available through current databases, though it will take time to compile it in useful format.

## Civilian Director of Professional Standards

SLCPD is currently in the process of hiring a civilian director for professional standards to eliminate the current Captain position. Though not typically seen in internal police operations, a civilian director can provide some stability to this critical role. Sworn police managers / leaders are typically in the later years of their career when assigned to professional standards resulting in high turnover rate. For example, SLCPD has had six different Captains leading the Professional Standards Division in the last four years. The turnover occurs more frequently with sworn staff than civilian staff. Additionally, for many departments there is higher frequency of transfer for captains and lieutenants, so their tenure in position often less than 3 years. This lack of tenure requires new personnel to be trained and time to gain experience to be effective in their role.

A civilian director over professional standards would provide stability to the position and provide a consistent approach to internal affairs process. It would still be important to have sworn personnel within professional standards because of the internal experience they bring to the process. Sworn positions should include the Internal Affairs lieutenant and sworn investigators. This is important because they have would have experience within the department which allows for better insight into department operations and procedures that would be hard to learn without the benefit of years of experience working within SLCPD policies and procedures. Additionally, identifying issues with use of force or other areas generally requires training and experience in the actual use of force.

To be successful the civilian director of professional standards would need to have extensive investigative and leadership experience. Additionally, to increase community trust it would be recommended that the director adopt more transparency processes within professional standards and seek community engagement activities with existing community and focus groups.

### Recommendations:

**Update IA process to new proposed policy which outlines types of corrective action that can be taken that are not considered discipline which allows for better corrective action and less administrative hearings for issues that would not result in actual discipline of days off or termination.**

**Adopt the proposed change that allows sergeants to handle limited minor complaints in the field and provides that the complaint “shall” be entered into “Blue team” employee management database.**

**Adopt proposed policy change that would require minor complaints be handled by division commands and more serious complaints to be handled by IA investigators.**

**Post complete IA complaint statistics on public website.**

**Post more Use of Force information with more breakout categories including demographics.**

**Adopt the proposed discipline matrix to establish consistent discipline for all employees.**

**Adopt policy that would require internal affairs investigations be completed even when an employee resigns or retires.**

**Adopt proposed policy recommendation that includes a “policy deficiency” finding.**

**Adopt proposed policy recommendation that includes a “coaching / counseling” finding.**

**Add “training deficiency” finding which denotes the member did not violate policy, because they were not trained or there is a training gap that should be addressed department wide.**

### **3. Analysis of Management Systems**

Matrix Consulting was asked to evaluate the personnel management system within the police department and identify any barriers that exist to correction, training and counseling of personnel by supervisors, and the ability to provide regular feedback from management to staff about technical performance, equitable treatment of subjects, tone and approach.

*For the purpose of clarity – Early Identification System (EIS), Early Intervention System (EIS) and Early Identification and Intervention System (EIS) refer to the same process or system of early identification of problematic employee behavior.*

#### **Early Identification and Intervention System (EIS) Overview**

Salt Lake City Police Department’s Early Identification and Intervention System (EIS) tracks employee data to identify personal and performance related issues. First line supervisors are required to participate in an initial face-to-face discussion with the employee regarding the performance or personal issue after a trigger threshold alert is

sent from the EIS Coordinator. Recommended interventions for performance related threshold alerts range from remedial training, policy review, coaching and counseling and personal improvement plans. SLCPD intends to add written letters of warning to performance intervention options pending SLCPD policy updates. Employees are mandated to follow performance related interventions. Professional interventions, if the suggested intervention is personal in nature, are considered optional for the employees.

SLCPD utilizes Versaterm IPro software for their Early Identification and Intervention Program. The system tracks seven categories with pre-determined thresholds. SLCPD Policy 1026.2.2 outlines these categories and thresholds as follows:

<b>Category 1 Complaints</b>	2 in a rolling 12-month period
<b>Category 2 Complaints</b>	2 in a rolling 12-month period
<b>M-Files</b>	3 in a rolling 12-month period
<b>Use-of-force</b>	18 in a rolling 12-month period that is above the 2 <sup>nd</sup> standard deviation for the previous calendar year (calculated by number of use-of-force incidents involving officers in the Operations Bureau)
<b>Vehicle Collisions</b>	2 in a rolling 12-month period
<b>Vehicle Pursuits</b>	2 in a rolling 12-month period
<b>Firearm Discharge</b>	2 in a rolling 24-month period (Other than an OICI and/or destruction of animals or wildlife)
<b>Overall</b>	4 of any combination of the above (excluding uses-of-force)

The lieutenant in the Internal Affairs Unit is the designated EIS Coordinator. The lieutenant monitors the system and is solely responsible for sending alerts and making adjustments to triggers within the constraints of IPro software.

### EIS Research and Comparison

As part of this analysis, the team interviewed SLCPD staff, reviewed IACP Law Enforcement Policy Center *Considerations Document* on Early Identification Systems

(May 2020), reviewed Building Law Enforcement Early Intervention Systems Technical Assistance Guide for the San Diego Police Department (DOJ Office of Community Oriented Policing Services), Best Practices in Early Intervention System Implementation and Use in Law Enforcement Agencies by the National Police Foundation and the Supervision and Intervention within Early Intervention Systems Guide-Police Executive Research Forum.

The IACP Considerations Document on Early Identification provides an outline for police agencies developing Employee Identification Systems and recommends agencies develop a policy statement that explains to agency personnel and the public, the agency's goals for identifying and responding to employee performance concerns. All of the above research reading offer guidance on what items or information should be tracked to best identify performance trends based on the specific goals of the agency. Those factors may include use of historical averages to identify meaningful deviations, size of the agency, peer/comparison groups, assignments (e.g., patrol vs. narcotics), locations of patrol (e.g., high-crime areas), community demographics, employee's previous performance. Following are additional suggested performance categories for EIS consideration:

- Civil litigation against the officer
- Sick Leave
- Traffic Stops
- Vehicular or foot pursuits
- Use of Force by type
- Resisting arrests indicated in reports
- Service related Injuries to officer
- Internal Complaints by peers
- Assaults on police officers
- Failure to Appear
- Commendations
- Extra Duty Employment

Early intervention systems should be seen as a supportive component to quickly identify issues so that they can be addressed at the lowest level. The system, as used by SLCPD, is not reactive enough to truly be an early intervention (e.g., an officer can use force 17 times before they would trigger an early warning as long as it falls within the rolling 12 month period). The SLCD system also does not reset after an intervention is conducted, creating mandated redundant trigger reviews for supervisors and employees.

The employee / supervisor conversations become a check list instead of fostering supportive relationships for supervisors and employees.

SLCPD assigned the EIS Coordinator responsibilities to the Internal Affairs Unit Lieutenant. This is not consistent with other police agencies, the International Association of Chiefs of Police (IACP) recommendations for Early Identification Systems or SLCPD's EIS Policy that EIS is committed to promoting employee success through non-disciplinary methods. IACP states the key factor that should be considered when developing and implementing an EIS is ensuring that any response to identified behaviors is viewed as supportive, rather than punitive. Assigning the Internal Affairs lieutenant, the EIS coordinator role places a supervisor who oversees investigations (part of the discipline process) in the same role as a person whose main concern should be identifying issues early and coordinating effective intervention strategies to avoid discipline. Additionally, having a supervisor who is involved in the discipline process could cause concern among officers that EIS is part of the discipline process, which it is not.

Best practice for EIS coordinator responsibilities is assignment to an independent position in the Professional Standards Unit. Most agencies assign these responsibilities to a sergeant. Duties for an EIS coordinator can include:

- Identification of employees who have met the criteria for and early intervention assessment.
- Monitors information related to certain unit or precinct-level activities for uses-of-force, numbers of individual employees who have triggered EIS thresholds, and frequency of EIS generated by employees assigned to specific supervisors in order to identify supervisors in need of additional skills and training.
- Verifies that the EIS threshold criteria record for identified employee is accurate to determine whether an EIS intervention should proceed.
- Notification responsibilities of completed intervention strategies.
- Provide assistance to personnel involved in intervention process.
- Reviews completed EIS documentation for completeness and timeliness.
- Compiles and provides statistically analysis for executive review.
- Adjustment of threshold criteria as needed for accurate employee review.

The yearly cost for the addition of a sergeant to the SLCPD Professional Standards Division is approximately \$81,000 for salary with an additional \$28,000 for benefits for a total of approximately \$109,000. This will also require department wide supervisor training.

IACP, Department of Justice COPS and other resource material cited provide guidance for the creation of early identification and intervention systems that achieve the stated goal of early identification of problem employee behavior for the purpose of an intervention that is supportive and pre-disciplinary.

SLCPD should use the IACP and Department of Justice COPS resources to update their EIS system. A working group involving officers, the police association, human resources, and police management should be established to make updates and design strategies that both help officers improve performance and to make sure adequate support systems are in place.

### Early Identification and Intervention System Review at SLCPD

The early warning system as used by SLCPD has only seven (7) categories are tracked in EIS which leaves out important areas of notification that should be included to provide a complete and accurate overview of an employee's work performance and capture other problematic employee behaviors as noted above. SLCPD should expand tracked categories to capture personnel and performance issues more accurately.

The EIIP has not been consistently used by supervisors though the system has been in place for three (3) years. Training for the IAPro system is still continuing. SLCPD administration needs to clearly communicate to all employees the purpose of personal management systems, adequately train supervisors on policy, agency software and how to appropriately analyze data collection thresholds for meaningful employee conversations and intervention.

There are limitations with the use of IAPro for the Early Identification and Intervention System portion of the software. The software does not allow the SLCPD administrator to set data boundaries to accurately reflect the unit, shift and work type for the employees, e.g. a night shift officer in a high crime district will have the same use-of-force threshold as a day shift officer performing investigative work. IAPro software works on a rolling calendar year and does not allow the administrator to set specific timeframes for when a threshold trigger has been met, or reset the threshold time in the category after an officer has received an intervention strategy.

The Department's policy for reportable use-of-force and the inflexibility of the software for EIS create a high number of threshold triggers for officers working on busy shifts, making more arrests and/or in units apprehending more violent combative subjects. For example, the SLCPD use-of-force policy states any use-of-force above compliant handcuffing is a reportable use-of-force. SLCPD also uses a wrap restraint system for

highly combative subjects. The restraint system requires additional officers assist in moving the subject after the restraint system has been applied. Each officer involved must report their involvement as a use-of-force.

IAPro software also does not allow the administrator to set specific data parameters which can create alerts that are inappropriate (e.g., an officer involved as a passenger in a crash will receive the same trigger as an officer involved as the driver in a crash). Officers may meet the trigger threshold for crashes requiring a supervisory review due to being the passenger in the vehicle.

Moreover, as the system is currently configured, once an officer meets a category threshold for the calendar year, every additional trigger alert requires a supervisor meet with the officer, document and recommend an intervention even if the supervisor recently met with the officer regarding the same threshold category. Supervisors of more active shifts with officers meeting the use-of-force thresholds are required by policy to meet for a review even if the supervisor and employee met even on the previous shift. The inefficiency and inflexibility of the system creates additional work for supervisors, unproductive communication with employees and does not accurately reflect employee performance patterns. SLCPD needs to replace the current data collection software to meet the needs of the personal management system.

There is a wide variation in sophistication, performance, and cost between EIS software vendors from as low as approximately \$10,000 to several hundred thousand. To determine the best system a working group should be formed to research various options available that will be serve SLCPD.

### **Recommendations:**

**Remove Early Intervention System Administrator duties from the IA lieutenant responsibilities.**

**Designate an Early Intervention and Identification System coordinator and move the administration of EIS from under the Internal Affairs Unit in the Professional Standards Division. At a Sergeant level the cost would be \$145,852 in salary and benefits.**

**Identify and implement a personal management system that can be tailored to collect pre-programmed criteria specific to SLCPD agency needs and community expectations.**

**Review categories for inclusion in data collection that could be useful as early indicators of potential problematic behavior (e.g. lawsuits and Traumatic Incidents).**



**Communicate in EIS policy the stated goals for the personal management system.**

**Replace the current method of data collection to a system that can be modified to capture data that supports the agency goals and purpose of a personal management system.**

**Provide agency wide executive led communication to agency personnel regarding personal management system goals, to include training on policy and/or system changes.**

### **Examples of Early Coaching and Counseling Systems**

Matrix Consulting was asked to provide examples of early coaching and counseling systems in other law enforcement agencies and parameters and thresholds for identifying situations where a pattern of performance issues exists such as excessive use of force, accidents, complaints.

The Matrix team reviewed other agency's early coaching and counseling systems and resource material from the Department of Justice Office of Community Oriented Policing Services, International Association of Chiefs of Police, the Police Executive Research Forum and Best Practices in Early Intervention System Implementation and Use in Law Enforcement Agencies by the National Police Foundation. Tampa Police Department and Portland Police Bureau were selected as examples of other agency early coaching and counseling systems. Both are similar size agencies. The Tampa Police Department was recognized in a study by the Police Executive Research Forum as an example of successful EIS implementation.

The Portland Police Bureau was selected due to similar reportable use-of-force requirements. Both Salt Lake City Police Department and Portland Police Bureau consider resistance beyond complaint handcuffing to be reportable creating high use-of-force counts for EIS review. Portland Police Bureau uses two use-of-force ratios in a six month time frame and a set number of 3 use-of-force in 30 days to ensure a problematic pattern of use-of-force reviewed by supervisors.

Both agencies have higher use-of-force counts than other agencies due to requirements for reportable use-of-force incidents. Creating a ratio comparison within similar units and shifts alleviates the redundancy of trigger alert reviews created by thresholds met in calendar year cycle.

Below are the threshold pre-programmed criteria for Portland Police Bureau:

- Shift Force Ratio: a sworn member's force ratio is greater than or equal three (3) times their shift's average ration in the preceding six (6) months;
- Force Ratio: a sworn member's force ratio is greater than or equal to 20% of their arrests in the preceding six (6) months;
- Force Count: a sworn member's force three (3) or more times in the preceding (30) days;
- Criminal Complaint: a member receives a complaint with an allegation of misconduct;
- Complaint in the Same Category: a member receives two (2) or more complaints with at least one (1) allegation in each complaint being in the same category such as two (2) complaints that both have conduct allegations for events in the preceding six months;
- Complaint Count: a member receives three (3) or more complaints for events in the preceding six (6) months;
- Traumatic Incidents: a member experiences three (3) or more traumatic incidents in the preceding 30 days;
- Commendations: a member receives two (2) or more commendations for events in the preceding six (6) months.

**Threshold Break:** An automatic notification to the EIS Administrator when a member reaches or exceeds a threshold.

**Type I Alert:** An alert notification that pertains to a complaint – or commendation-related threshold break.

**Type II Alert:** An alert notification that pertains to a force or traumatic incident – related threshold break.

**Type III Alert:** An alert notification that pertains to statistically meaningful deviations from normative behavior, with respect to groups and their respective supervisors, which the should be specific to the agency law enforcement work trends and citizen expectations.

The Tampa Police Department is recognized by PERF for their successful EIS system, and their policy is an example of best practice. The Tampa Police Department clearly outlines the purpose of their personal management program, identifies EIS as part of an overall management system, includes several data points for review, and gives clear direction on how information will be evaluated by supervisors and command. The Tampa Police Department's Policy for EIS to include the parameters for threshold reporting is provided as an appendix to this report.

#### 4. Analysis of the Memorandum of Understanding

The Matrix team reviewed the Memorandum of Understanding between the Salt Lake City Corporation and the Salt Lake Police Association, Salt Lake City Police Department Policy, interviewed Human Resources personnel, the Salt Lake Police Association President and upper command.

Salt Lake City Corporation and Salt Lake City Police Department have made changes to city processes and are currently rewriting police department policy. The city recently dissolved the Civil Service Board which affected many of SLCPD's personnel related services. There were duplicative processes between SLCPD and the Civil Service Board, however that is now remedied. The team did not identify other duplicative processes between the Memorandum of Understanding and the City. However, there are areas of needed improvement.

The MOU and SLCPD policy stipulate that all officers investigated for complaints that could result in discipline be afforded a pre-determination hearing which also includes preventable traffic collisions. The MOU and SLCPD Policy identify three categories of discipline imposed by the city. The lowest level of discipline, Tier One Discipline, identifies written warning letters as a form of discipline. This hinders supervisors from addressing minor complaints against their employees with a discussion and written documentation due to the contractual agreement that the officer be allowed a pre-determination hearing for any allegation that may result in a written warning letter.

Internal Affairs personnel identified this issue as a cause for increased case load for Internal Affairs investigators as well as a barrier to resolving employee behavior at the lowest level. In our review of other departments nationally, SLCPD was the only department that had this barrier to addressing employee issues with a verbal written warning. According to SLCPD Policy 1003.14, officers may waive their contractual rights for the pre-determination hearing and request an outline of the potential discipline for the alleged misconduct. If the member chooses to waive their contractual rights, the member must accept the discipline without the possibility of appeal. This creates a dilemma for employees and supervisors attempting to resolve complaints at the lowest level.

The MOU grants the City extensive management rights and sets few limitations on the city to provide police service to the community. The City can set work policies, work hours and can direct work activities. There are no barriers to effective management of the police department listed in the MOU with the limited exception of Article 15 which is mentioned above and codified in SLCPD policy 1003. This article should be the subject

of future negotiations so that supervisors have the ability to address very low-level policy violations or other work issues at the lowest level.

## **Recommendations**

**Revise policy to enable supervisors to investigate and address low level complaints without violating agreed upon contractual rights.**

**Negotiate with the Salt Lake Police Association regarding wording and/or what is considered discipline at the lowest level.**

## **5. Analysis of Body Worn Camera Program**

The project team was tasked with reviewing SLCPD current body camera program focusing on three main areas: Evaluate body worn camera activation procedures and policies; identify successful body worn camera programs in other municipalities where body worn camera videos are randomly sampled and reviewed for key performance measures of de-escalation, equal treatment of individuals and adherence to policies.

To conduct our analysis the project team examined the SLCPD body worn camera policy (Policy 422), reviewed Utah Code 77-7a (legislates body worn camera programs), reviewed other law enforcement policies and reviewed IACP Body Worn Camera Model Policy and conducted staff interviews. Additionally, the project conducted a search of other municipalities that use civilian staff outside of the police department to conduct video review.

### **Body Worn Camera Program Overview**

Salt Lake City Police Department started deploying body worn cameras in 2013 and currently body worn cameras are issued to every officer that is deployed and has contact with the public. The department has conducted body worn camera compliance audits in the past and currently requires that video from two randomly selected dispatch incidents per month are reviewed by a supervisor. Random auditing on officer body worn cameras is considered a best practice and is included in IACP's model policy.

### **Body Worn Camera Policy Review**

There are a few key areas of body worn camera policy that were the focus of this review: Who is issued or required to have a body worn camera, what are the activation

requirements, what are the exceptions and does the department audit body worn camera use.

In the Salt Lake City Police Department body worn camera use is covered by policy 422 (Portable Audio / Video Recorders) which is largely dictated by Utah Code 77-7a (Law Enforcement Use of Body-worn Cameras) which was adopted in 2016. Utah Code sets minimum standards for activation, storage, notifications, and other body worn camera procedures.

Though SLCPD Policy 422 follows Utah Code 77-7a, it exceeds it by more clearly identifying when cameras must be activated and includes a section (422.3.4) Failure to Activate a Body Worn Camera which states “failure to activate ... may result in corrective action or discipline.” This added language indicates to members the importance of proper activation of the body worn camera.

SLCPD’s body worn camera policy is clearly written and the activation requirements ensure the cameras are activated to capture all public contact with limited exceptions which are noted in Utah Code 77-7a below:

- (9) An officer may deactivate a body-worn camera:
  - (a) to consult with a supervisor or another officer;
  - (b) during a significant period of inactivity;
  - (c) during a conversation with a sensitive victim of crime, a witness of a crime, or an individual who wishes to report or discuss criminal activity if:
    - (i) the individual who is the subject of the recording requests that the officer deactivate the officer's body-worn camera; and
    - (ii) the officer believes that the value of the information outweighs the value of the potential recording and records the request by the individual to deactivate the body-worn camera; or
  - (d) during a conversation with a victim of a sexual offense, as described in Title 76, Chapter 5, Part 4, Sexual Offenses, or domestic violence, as defined in Section 77-36-1, if:
    - (i) the officer is conducting an evidence-based lethality assessment;
    - (ii) the victim or the officer believes that deactivating the body-worn camera recording:
      - (A) will encourage complete and accurate information sharing by the victim; or
      - (B) is necessary to protect the safety or identity of the victim; and
    - (iii) the officer's body-worn camera is reactivated as soon as reasonably possible after the evidence-based lethality assessment is complete.

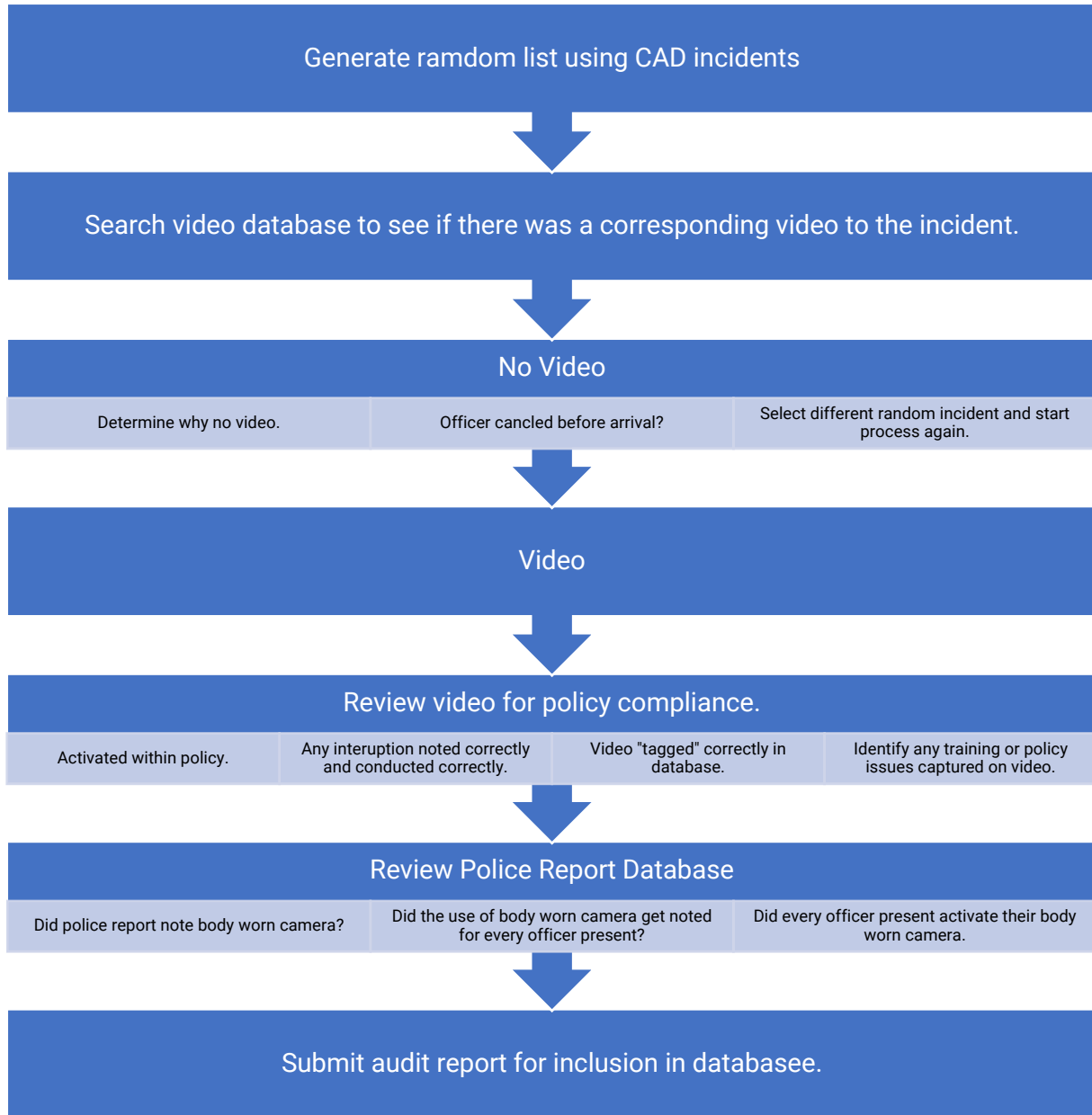
These limited exceptions are mostly for community member privacy.

Policy 422 does not require auditing of body worn camera video by supervisors and only states “supervisors are authorized to review relevant recordings any time they are investigating alleged misconduct.” Though this is important to note in policy, it falls short of the IACP model policy that indicates “supervisors should on at least a monthly basis randomly review body worn camera videos to ensure that the equipment is operating properly and that officers are using the devices appropriately and in accordance with policy and to identify any areas in which additional training or guidance is required and state minimum requirements.”

### Body Worn Camera Auditing

As noted above, Policy 422 does not mandate random supervisory review of body worn camera video, however this is currently being conducted under a recent change in 2020. In the past the audit and inspections unit in Professional Standards has conducted random sampling of body worn camera video using a random number generating software to select incidents from the computer aided dispatch (CAD) system. Random audits were started by the Audit and Inspections unit in the Professional Standards Division in the fall of 2019. Any issues discovered were directed back to the operational division to conduct the appropriate intervention or follow up.

In the current system under the 2021 Audit Plan each supervisor is required to review two random incidents per officer per month. Once complete the supervisor returns and audit form to the audit and inspections unit indicating that the review had been conducted and any deficiencies noted. The change in this procedure was made because the number of hours to conduct the body worn camera reviews limited the ability of the audit and inspections unit from conducting other audits and inspections. Additionally, by conducting audits outside of the divisional chain of command front line supervisors were not involved, which limited their ability to proactively address any issues discovered in the audits. Using front line supervisors to conduct audits allows supervisors to be involved in minor performance corrections and to better know how their direct reports are handling calls for service. One issue with utilizing front line supervisors to conduct audits is it takes them out of field activities to conduct the audits in the office which limits their ability to respond to calls proactively. One random video audit can take up to an hour per officer to perform because of the number of tasks required. The following table outlines a typical process for a random body worn camera audit:



As the table indicates there are several steps involved to randomly sample one dispatch incident. It is important to note that not every dispatch incident will have a corresponding video. The most common reason is that officer is cancelled before arrival or that no public contact was made.

Body worn camera preliminary auditing from October 2019 through December indicates that activation compliance is good, however there are some areas where improvement could be made in other areas as shown in the following table:

### Compliance Rates from Body Worn Camera Audits

<b>Activity</b>	<b>Compliance Rate</b>
Activated in accordance with policy	92%
Noted camera activation in report	47%
Tagged video correctly	68%
Video interrupted within policy	43%

As the table indicates body worn cameras are activated in accordance with policy 92% of the time, but there are other categories tracked that are below the expected rate of compliance. The two areas that were noted were – camera activation not noted in a police report and the video was not interrupted within policy. The 47% compliance rate for noting the activation of body worn camera in report was mostly due to officers who were back up or responded to incidents where they were not required to write a report for the incident and therefore did not write a report at all which included not writing a report only for camera activation. SLCPD has updated training and procedures to increase compliance. The 43% compliance for video interruption within policy was generally for failing to follow procedure correctly, though the interruptions generally fell into allowable interruptions for victim privacy or to consult with a supervisor. To address this, SLCPD has completed additional training at in service and updated procedures.

### SLCPD Comparison to Other Audits

A search of other agency body worn camera audits was conducted to compare SLCPD body worn camera compliance to other departments. Though each audit was conducted with different performance metrics and with different body worn camera policies. Additionally, not each audit covered the same areas or posed audits questions in the same manner. Even with these limitations a reasonable comparison could be completed. The following table indicates how SLCPD body worn compliance performance metrics compared to other departments:



<b>Agency</b>	<b>Audit Date</b>	<b>Activation Compliance Rate</b>	<b>Noted in Report</b>	<b>Video Interrupted Within Policy</b>	<b>Video Tagged Correctly</b>
Atlanta, GA	Dec-18	61%	N/A	47%	85%
Aurora, CO	Sep-20	96%	N/A	33%	88%
Austin, TX	Jun-19	86%	N/A	96%	83%
Minneapolis MN	Sep-17	71%	N/A	50%	95%
<b>Salt Lake City</b>	Dec-20	<b>92%</b>	<b>47%*</b>	<b>43%</b>	<b>68%</b>
<b>AVERAGE</b>	<b>N/A</b>	<b>81%</b>	<b>N/A</b>	<b>54%</b>	<b>84%</b>

\*Most of these were back-up officers who were not required to write a report for the incident.

As the table indicates SLCPD is above average in activation compliance but below average in compliance with procedures on interrupting video and tagging video correctly.

### Body Worn Camera Review by Independent Body outside of the Police Department.

Salt Lake City Ordinance 54 of 2020 which was passed on December 1<sup>st</sup>, 2020 states “a qualified individual outside of the Salt Lake City Police Department designated by the Mayor shall randomly review at least five body-worn camera recordings at least once a month.” The ordinance does establish where this position should be placed in the organizational structure of Salt Lake City.

A search of already established independent review of body worn camera videos by civilians was conducted. The project contacted and researched several progressive cities to find a body worn camera review model that included independent civilian oversight. One example noted was the Fort Worth (TX) Office of the Police Oversight Monitor which has the authority to conduct random sampling of police department body worn camera video. The office was created in February 2020 and has not produced a body worn camera audit.

Several cities use an independent Auditors office to conduct reviews. One example noted was in Chicago (IL) which was conducted by the City of Chicago Inspector General. The audit found the Chicago Police Department was not conducting random audits as required. The audit did not review videos or incidents to determine if there was actual policy compliance by officers. An audit by the Austin (TX) City Auditor did review videos

and found policy compliance issues and made several recommendations. Similarly, the Atlanta Auditor's Office conducted an independent audit in 2017 / 2018 and found that Atlanta Officer were only activating their cameras approximately 33% of the time when they would have been required to under policy.

The Civilian Police Review Board is the most logical placement for this position. Salt Lake City has an existing Civilian Police Review Board which has some auditing authority granted by City Code 2.72.220. Audits are currently conducted for review of Internal Affairs complaints and does not cover auditing of body camera video. Enhancing audit authority to cover body worn camera videos and requiring an annual or bi-annual reporting could establish an independent review of body worn camera videos and compliance. An additional person would be needed to fulfill this role, though they could have additional duties assigned. Ordinance 54 of 2020 only mandates the random review of 5 videos per month. This is an extremely limited review considering there were 148,574 calls for service in 2020. A review of only 5 videos per month would result in only 60 videos reviewed per year out of 148,574 calls for service. This would amount to about 5-10 hours of work per month for a trained investigator. To ensure the highest degree of compliance the independent body worn camera video review should include random sampling of officer videos as well as randomly sampling of completed supervisor reviews so that the Civilian Police Review Board could verify that supervisors are compliant with their review responsibilities.

Body worn camera programs were mostly developed in response to officer use of force. Though random sampling may find some use of force event, historically less than 5% of police calls for service result in any use of force. Each use of force at SLCPD results in an administrative review of the force. However, outside of an internal review there is no independent review of use of force unless a complaint is filed. Since body worn cameras were in response to use of force concerns it would be useful to also audit use of force reviews to determine if the review was conducted appropriately and if review outcomes are within policy.

The established workload of the investigator established under Ordinance 54 of 2020 is very low and would only review a small fraction of body worn camera videos. To increase the workload and accountability the position should be required to review no less than 20 videos per month. Adding an additional task of reviewing random administrative use of force reviews would also increase accountability for force within SLCPD.

Ordinance 54 of 2020 does not indicate that a published audit be presented annually of findings. A published audit would increase transparency for the position and would allow the Mayor, Council and the public to better informed about how well the body worn

camera program is performing. Additionally, Ordinance 54 of 2020 does not specify how audits are to be conducted. This could lead to different performance metrics to be used by SLCPD and the independent body worn camera auditor. This could cause on confusion or lack of a clear understanding of how well the police department is performing with their body worn camera program. This could also result in mixed messages if two different performance metrics are used. To address this, the body worn camera auditor should work with the SLCPD audit and inspections unit to develop consistent performance metrics and language so that any reporting by either unit is consistent in data, metrics and performance language.

## Transparency

Police transparency is an important aspect of police-community relations. SLCPD does publish use of force data on its webpage however there is no data from any body worn camera audits published. Publishing data on body worn camera compliance and corrective actions could help inform the public that SLCPD actively monitors body worn camera video activations and other data. The publishing of this data can help alleviate mistrust between the police department and the community they serve by being transparent, especially important when they have internal data than can indicate how well they are doing.

Salt Lake City Policy 422 on body worn cameras includes several best practices that ensures the maximum number of police – community contacts are recorded. The policy is silent on supervisory random sampling of body worn camera videos. Though the department conducts random sampling of two officer incidents per month through the audit and inspections it is not codified in policy, which is best practice.

There is no current procedure or policy for outside review or auditing body worn camera video. This task could be assigned to the current Civilian Police Review Board as an added responsibility instead of creating a new unit or department. This would require at least an additional staff person who could have added responsibilities. The department could improve transparency by publishing the results of their body worn camera review audits.

### **Recommendations:**

**Maintain current monthly body worn camera auditing procedures by supervisors.**

**Update body worn camera policy to include mandatory audits by supervisors.**

**Conduct annual random small sample body worn camera audits to be conducted by the audits and inspections unit.**

**Post body worn camera compliance on the public website.**

**Add annual body worn camera audit responsibility to the police civilian review board (PCRB) responsibilities.**

**Create a new position which should report to the PCRB Investigator.**

**The independent body worn camera auditor should review a minimum of 20 videos per month.**

**Added responsibility for auditing use of force reviews should be included in the position.**

**The position should be required to publish a bi-annual or annual report.**

**Body worn camera review performance metrics should be established by working with the current Audit and Inspection unit within SLCPD.**

## **8. Officer Mental Health Services**

Matrix Consulting was asked to review mental health services available to SLC police personnel. To conduct this analysis the team reviewed resource material from IACP, DOJ's Office of Community Oriented Policing Services, Ontario Provincial Police Independent Review Panel for Officer Wellness, interviewed SLCPD personnel, reviewed a recent employee survey regarding mental health and compared existing resources to best practices in other departments.

Employee mental health has become an important aspect of officer wellness as evidenced by inclusion as one of six pillars in President Obama's Task Force on 21<sup>st</sup> Century Policing. There is renewed awareness that a mentally and physically healthy police force is of paramount importance. In the last twelve months alone, police agencies nationwide have navigated Covid outbreak conditions, faced violent protests and months of civil unrest and increased distrust of police. In the midst of these challenges Police must maintain their composure and focus to complete their tasks no matter how uncertain the circumstances. The concept behind officer wellness and mental health services is that a healthy officer is likely to better serve the public.

Many agencies have adopted or are in the process of adopting officer wellness programs that provide multiple approaches and options available to officers when it comes to mental health support. Officer wellness programs vary from focus on mental health and resiliency to physical fitness, nutrition and mindfulness. The focus of this review is to evaluate the SLC officer wellness processes in place, identify any gaps in service and to make recommendations.

### Current SLC Officer Wellness Program and Services

SLCPD has had a peer support program since 2003. In March, 2020 due to the Covid pandemic, an officer was assigned a temporary position in charge of Covid safety considerations for the department. Another position was added and both were placed under the Lieutenant Executive Officer in the Chief's Office. One officer is in charge of Health and Safety and the other tasked with developing a Wellness program for the department. SLCPD also obtained funding for a professional mental health clinician who has yet to be hired.

SLCPD has the following services available to members:

- **Peer support** - SLCPD currently has 21 peer support members with a goal of attaining 30 members. Members are selected through a vetting process and provided training by SLCPD. There are several ways to access peer support to include the dispatch center and a 24/7 hotline staffed by the Wellness Officer or designee.
- **EAP** - SLCPD has an EAP program through the city. Therapists are vetted for training unique to police and fire needs. Police and Fire have 15 sessions available to them a year per issue.
- **Chaplain Program.**
- **Crisis Response Team** – Specially trained officers to respond to emergency mental health crisis needs. The team includes a therapist.

SLCPD sent out a mental health survey in 2019 with a 48% response rate and again in 2020 with a 52% response rate at the request of the Wellness Officer. There were several areas of concern in the 2019 survey, with many trends showing a significant increase as reported in the 2020 survey. Officers were asked questions related to emotional mindset, barriers to mental health treatment and which coping skills they utilized. There were significant increases in officers feeling more depressed, having difficulty concentrating,

having sleep issues, experiencing distressing work flashback and experiencing thoughts of suicide. Following are comparison results between the 2019 and 2020 surveys from a sampling of questions.

- **Feeling down, depressed, or helpless** - 96% increase in officers answering “often” and 135% increase in officers answering “very often”
- **Finding it difficult to separate work from my personal life** – 52% increase in officers answering “often” and 252% increase in officer answering “very often”
- **Feeling distant or cut off from people outside law enforcement** – 27% increase in officers answering “often” and 118% increase in officers answering “very often”
- **Experiencing distressing memories of job related experiences** – 154% increase in officers answering “often” and 95% increase of officers answering “very often”

The SLCPD survey also indicated officers felt there were barriers to them accessing mental health treatment. The survey is consistent with how officers feel in many police agencies due to police culture. Lack of leadership around mental health wellness perpetuates a culture of silence around mental health issues. The same culture that ignores mental health issues often condemns officers for maladaptive behaviors arising out of treatable mental health coping mechanisms including alcohol and substance abuse. Officers feel there will be a “stigma” attached to them or that seeking professional help will harm their career. Officers who leave mental health issues untreated are at risk of issues playing out in the public and at home.

The SLCPD Wellness Officer has developed and delivered training on several topics related to fitness and nutrition, importance of sleep, officer resiliency and mindfulness training. The training is targeted to new recruits and their families, regular officer trimester training and officers nearing retirement. The Wellness Officer is in the process of increasing the number of the Peer Support team members, has increased communication to the department regarding how to access services and implemented a 24/7 hotline for officers to call for help or information. SLCPD policy for the wellness program is currently being drafted.

The steps taken by the Wellness Officer with regard to education topics and increased access to mental health services aligns with research recommendations. However, the officer is continually in response mode due to the increased number of officers in crisis. For an agency culture to change with regard to understanding the effects of traumatic incidents, the importance for officers to manage trauma proactively and seek professional mental health treatment when needed, agency executives must be lead the

effort by embracing mental health awareness education, training and wellness initiatives.

As part of Law Enforcement Mental Health and Wellness Act of 2017 the Department of Justice to submitted to Congress a report that identified successful officer mental health and wellness programs using a case study format. Eleven agencies were selected for the team to study. Each case study layered a number of strategies from recruitment to retirement and covered prevention, early intervention, resiliency building, reintegration, crisis response and follow-up care. The consensus of interviewees is that there is no one single solution. A holistic approach using multiple components achieved the best results. The following were identified as important factors for program success.

- A strong commitment from all levels of the agency.
- Top down agency wide support to prioritize and support officer mental health and wellness in a way that overcomes the stigma and builds trust in confidentiality.
- Mental Health and Wellness was paired with fitness, nutrition, medical care, sleep, relationships, financial stability, substance abuse, self-care, early warning systems and character and moral development.
- Clear and transparent communication by agency executives about motives for the wellness program.
- Unions are key stake holders and should be active participants in helping create or support expansion of services.
- Resources for units, programs or services need to be consistent and institutionalized in budgets rather than grants outside funding.
- Collaboration between mental health professionals and officers was key to creating contextually appropriate programs that address needs of officers while remaining consistent with science and research.

The Case Study assembled the below list of Wellness Programs utilized by 11 agencies studied.

- Recruitment, hiring and screening for mental wellness
- Training Academy resiliency and self-care
- In-Service training on mental wellness topics

- Suicide prevention
- Supervisor training as front-line mental health first aid
- Mentorship programs
- Early warning systems
- Critical Incident Response Teams
- Debriefing protocol
- Peer support programs
- Behavioral health and wellness units
- Counseling (finances, family, career)
- Referrals for service
- Substance Abuse
- EAP
- Chaplaincy role
- Treatment (residential /non-residential)
- Recurring mental health checks
- Mandatory counseling following critical incident
- Eye movement desensitization and reprocessing therapy
- Officer Crisis care and support (injury, illness, line-of-duty deaths, etc.)
- Military support – deployment and reintegration
- Retired Officers
- Spousal support, healthy families, or Family Day
- Department wide resiliency training
- Department wide mindfulness training

### Other Department Programs

The team reviewed other wellness programs in addition to the 11 case studies above to include Indianapolis Metropolitan Police Department's Office of Professional Development and Wellness, San Diego Police Department and an Independent Police Review of the Ontario, Canada Provincial Police Department.

Indianapolis Metropolitan Police Department's Office of Development and Wellness is staffed by a lieutenant, two sergeants and an officer. The unit is organized into Developmental Programs, Mentoring/Training and OPDW Case Management/Crisis Intervention.

Developmental Support Includes:

- Peer support and mentoring
- Career pathing, recruitment
- Deployed Member Support Unit



- Wellness Symposium
- Internal/External Training
- CrossFit/Yoga
- Our Health Clinic
- Partnerships with area Universities

Mentor Training Includes:

- Police wellness
- DISC- behavior profile
- Active listening
- Millennials – minorities – women
- Goal setting
- Team Building
- Individual Awareness

OPDW Case Management/Crisis Intervention includes:

- Work with officers struggling through different areas of stress
- Partner and with and are a point of contact for clinicians/supervisors
- Partner with officer for accountability
- Support for officer and family

Types of cases:

- Officer-involved shootings
- Critical Incident response
- POST Team
- Discipline
- Sick or Injured Officers
- Wounded Guardians
- Crisis Intervention
- Family Support

In the first three years the OPDW unit saw contacts increase 81%, voluntary referrals increase 300% and **disciplinary/performance referrals decrease 40%**.

In 2019 the Ontario, Canada Provincial Police Department was reviewed by an Independent Police Review Panel after recent suicide deaths and mental health concerns of OPP members, as well as complaints about work place culture. The issues facing the OPP with respect wellness and culture included:

- Leadership

- Trust and credibility
- Isolation
- The current wellness programs and services
- Identity and stigma
- Family relationships
- Administration and organizational pressures

The Police Review panel made several recommendations. A few are as follows:

- Leadership and organizational responsibility for wellness and positive workplace culture is required
- Cultural change through leadership
- Modeling change from the top
- Holistic approach to wellness
- Wellness as an organizational priority requires dedicated resources
- Mental Health Services should be assessable and credible

### SLCPD Officer Wellness Service Gaps

SLCPD has already identified the need for mental health support services affirmed by the 2019 and 2020 employee surveys. Through interviews with SLCPD staff, Matrix team members learned that some officers felt a lack of widespread support from police executives with regard to officer wellness and the culture within the department did not encourage and support mental health fitness.

Officer Wellness programs in addition to traditional peer support and EAP assistance are an emerging practice for police agencies. SLCPD has identified the need for a Wellness program and staffed the position. SLCPD has revitalized the Peer support program, developed draft policy and started the process of educating SLCPD personnel about taking a holistic approach to health and wellness. Those are all vital elements of officer support in crisis, but not enough for culture change for SLCPD. Reference and research material reviewed agree the most important factor in the success of an agency's mental health wellness program is cultural change through executive leadership and funding for wellness unit initiatives.

Both the DOJ case study of 11 U.S. police agencies and the Ontario Provincial Police Department stressed the importance of a top down agency wide support to make officer mental health and wellness a priority and create a culture accepting of the various means to promote holistic wellness. Both emphasized the need for executives to dedicate resources for programs and education.

Wellness programs have shown positive results for officer health and well-being, better interactions with citizens, and budget and organizational improvements. Officers participating in wellness programs improved in the following areas:

- Lower rates of injury.
- Fewer sick days.
- Reduced fatigue and sleeplessness.
- Greater officer retention.
- Increased sense of being supported.
- Improved sense of wellbeing.
- Decrease in the use-of-force .
- Fewer complaints against officers.
- Helping officers manage stress makes them better able to de-escalate.

The costs associated with the development of an effective Wellness program are scalable to each agency. The wellness program for the above-mentioned Indianapolis Metropolitan Police Department serves 1700 hundred sworn and 250 civilian employees. Statistics for successful wellness programs show reduced agency costs due to fewer injuries, fewer missed days of work for job related injuries, fewer complaints, reduced sick time use, and fewer use-of-force incidents with associated workload requirements for investigation of the use-of-force.

### **Recommendations:**

**Develop an executive led department plan to train all personnel regarding trauma, stress and PTSD for first responders from accredited behavioral science experts.**

**Identify ongoing funding for the Wellness Office training and programs.**

**Measure outcomes of implemented education and training.**

**Create a steering committee of stake holders, to include clinicians, to make actionable recommendations to address the 2019 and 2020 officer survey.**

**Use steering committee to research resiliency training for employees in high stress/trauma environments.**

## Appendix – Tampa Police Department EIP

### 651.1 EARLY INTERVENTION PROGRAM (EIP)

- I. **PURPOSE:** The Tampa Police Department has a responsibility to its employees and the community to maintain a comprehensive early intervention program. The early identification of employees who are engaging in a pattern or practice of problematic behavior or are experiencing underlying issues that are affecting their job performance is imperative. Providing a method for identifying performance deficiencies, taking corrective actions, and making appropriate referrals increases the department's accountability and offers the employee a better opportunity to meet the department's values and missions statements.

Although no specific and universal set of criteria can determine job stress and/or job performance problems, it is important that certain types of performance indicators be reviewed. Nationally, it is recognized that law enforcement early intervention programs should include, but not be limited to, a review of Professional Standards investigations, citizen complaints, and use-of-force incidents among others. Incidents, which are identified, may appear to be acceptable by themselves, however, a pattern of less than optimal job performance may be developing that is more difficult to identify by looking at one incident alone. Several indicators detailed in this program will allow supervisors to examine the totality of each individual's actions, to make a more accurate assessment of each incident and to take corrective actions before the behavior becomes career damaging by moving into the traditional disciplinary system.

The Tampa Police Department Early Intervention Program (EIP) has been established to provide a systematic review of performance indicators. This data will be disseminated to the appropriate supervisor who will review each incident, individually and collectively, meet with the identified employee, and submit a summary of their findings through their chain of command to the Professional Standards Bureau.

The results from this program will better serve the interests of the employee, the department, and the community.

- II. **DISCUSSION:** The EIP will be based on a set of performance indicators within a "real time" 90-day interval. As an employee reaches a certain threshold of any of the performance indicators, an alert is made to the program facilitator on that employee. The program is designed to be used as a resource to assist supervisory personnel in evaluating and guiding employees to perform at their best level.
- III. **CRITERIA:** To identify possible candidates for the EIP, the following criteria have been established:

- A. Performance Indicators: These indicators and the threshold area are described as follows:
1. Formal Professional Standards Cases: Received two or more formal PSB complaints.
  2. Response to Resistance: Involved in four or more use-of-force incidents in which the level of force used to gain compliance was “E” (physical blows struck by hands or feet) or above, as indicated in the Response to Resistance report generated in RMS or on paper.
  3. Service Related Inquiry: Received three or more Service Related Inquiries from PSB or any other division.
  4. Division Discipline: Received three or more documented disciplinary actions initiated at the division level.
  5. Failure to Appear: Received three or more complaints for failing to appear at any court hearing.
  6. Extra Duty Employment: Received three or more complaints concerning any aspect of any Extra Duty Assignment, including, but not limited to, unexcused absences (no-shows), worked excessive hours, or inattentiveness to duty.
  7. Investigative Aggregate: Any combination of three of the following performance indicators:
    - a. Formal Professional Standards Cases;
    - b. Service Related Inquiries;
    - c. Division Discipline;
    - d. Failure to Appear; or
    - e. Extra Duty Employment.
- B. It should be emphasized that the dispositions of the particular incidents are **NOT** the issue in this program. Every indicator follows a unique and often unpredictable timetable. The program, is based on early detection of possible patterns or practices by the employee, it is the preset thresholds that are emphasized.
- IV. **PROCEDURE:** The EIP will be facilitated by the Professional Standards Bureau.
- A. The facilitator will conduct a query utilizing the PSB database.
  - B. A query of the database will occur on a weekly basis. It will be conducted in the Early Intervention component of the PSB database.

1. All enumerated performance indicators will be used in this query to include:
  - a. Formal PSB cases;
  - b. Required by Policy cases;
  - c. Response to Resistance Incidents (at the alpha value of “E” or higher);
  - d. Service Related Inquires;
  - e. Division Discipline;
  - f. Failure to Appear;
  - g. Extra Duty Employment; and
  - h. Previous EIP Packages of affected employee.
2. A notification letter will be routed to the appropriate division commander or distribution to the immediate supervisor.
3. The immediate supervisor shall analyze the incidents that have been identified and shall meet with the employee for the purpose of discussing the reasons for the qualification for the review.
4. A Command Review in the form of a Report Summary shall be initiated and authored by the immediate supervisor.
5. An annual evaluation of the system will be included in the annual report submitted by the Professional Standards Bureau.

V. **COMMAND REVIEW AND ANALYSIS:** The employee’s immediate supervisor and chain of command should be involved in the analysis of any employee identified as qualifying for EIP. This program mandates that the qualifying employee and his immediate supervisor have a personal meeting to discuss their involvement in the program.

- A. Facts and documentation on each identified indicator should be reviewed, such as, but not limited to:
  1. Police reports;
  2. Administrative letters;
  3. Professional Standards cases (if complete);
  4. Division Discipline forms; and
  5. Service Related Inquiries – supervisor copy (yellow form) and accompanying documentation.

- B. The analysis of the facts should include consideration of the totality of the circumstances surrounding each incident, drawing on knowledge of human behavior, department policies and procedures, and wisdom gained from law enforcement experience.
1. Determine what, if anything, could have been done differently to prevent the complaint;
  2. The process of analysis should include a recognition that there are circumstances when response to resistance is necessary and proper, and that there are occasions when false or misleading accusations may be made against officers by citizens;
  3. Decide if there are any similarities between incidents;
  4. Determine if other possible indicators of stress are present such as an unusual amount of sick leave, tardiness, marital problems, etc.;
  5. Determine if a trend or pattern of behavior is indicated; and
  6. Make appropriate and accurate referrals.
- C. Supervisors will initiate a mandatory informal meeting with the employee and discuss the incidents that gave rise to being identified in the EIP. Further, supervisors will make every effort to determine, during this meeting, if there are other factors affecting the employee's job performance.

If the indicators stem from an open and active Professional Standards investigation, the supervisor will not discuss the facts of the case, as that is a violation of policy and is a violation of the employee's rights. In those specific cases, the supervisor will make an effort to determine if the employee is in need of a referral and will make every effort to determine if there are other factors affecting the employee's job performance.

VI. **REPORT COMPOSITION:** The summaries of each supervisor's finding with respect to candidates identified as qualifying for EIP will be uniform. A report summary will be drafted for each employee who qualifies under the EIP.

- A. Report Summary: The report of the analysis will include a brief summary of the facts of each incident and/or complaint, the findings and conclusions based on the supervisor's analysis, and a recommended disposition. The Report Summary will contain the following information:
1. Employee's name and payroll number;

2. The type of indicators that the employee met to qualify for EIP;
  3. A brief summary of each incident;
  4. A brief summation of the meeting between the supervisor and the affected employee, to include, if applicable:
    - a. Any referrals;
    - b. Goals and objectives; or
    - c. Suggestions and comments about the meeting.
- B. Dispositions: After reviewing documentation, taking into account the totality of circumstances and meeting with the employee, the supervisor will recommend a disposition concerning the intervention performed.
1. Dispositions include:
    - a. No further action needed or required;
    - b. Referral, based on the circumstances, to an appropriate entity;
    - c. In cases in which the EIP activation stems from an open/active Internal Affairs case, NO disposition will be rendered as to the facts of the PSB investigation. The disposition will instead make a determination if there is a pattern of behavior, if the employee is in need of some type of services, or if a referral is needed.
- C. Referrals: If it is determined a referral is required, the supervisor has several referral options to consider. The participation of the Training Unit members is a viable and constructive way to ensure the employee is performing their duties within departmental guidelines. Additionally, the use of EAP services should also be considered. Under EIP, referral to training and remediation may be mandatory, whereas recommendations to attend psychological counseling or spiritual services are voluntary.
1. Remediation or training:
    - a. The employee may need refresher training in human relations skills, defensive tactics, cultural diversity, driving, certain department policies and procedures, etc. Training will specifically fit the needs of the employee.
    - b. If formal training is recommended, the supervisor will contact the sergeant in the Training Bureau and will coordinate placement of the employee in an appropriate training class or assist with the development of a custom tailored curriculum. Every effort will be made to specifically fit the training to the



employee's needs. The training will be scheduled and accomplished as soon as possible after the supervisor's meeting with the employee. A brief synopsis of the training will be documented and will be included with the EIP package.

2. Recommendation to attend a psychological service program for counseling or assistance. The officer may need personal or family counseling, financial and money management counseling, and/or drug or alcohol assistance.
  3. Recommendation to attend stress awareness courses. Consideration should be given to physical fitness testing, weight management counseling, and enrollment in a physical exercise program.
  4. Transfer to another assignment.
- D. Final Review: The report, with the recommended disposition will be completed by the affected division within thirty days and forwarded back to PSB. The PSB captain will then review the summaries and provide a copy to the chief of police, and the appropriate assistant chief of police. The original reports will be maintained at PSB, length of retention will be in accordance with current retention schedules.

In the event that the chief of police does not concur as to the dispositions and/or recommendations, the chief of police will notify the affected assistant chief, as well as the captain of PSB, and address the specific concern in the findings. The chief of police will determine the final disposition.

1. The employee should be fully informed of the findings and disposition.
2. A copy of the report may be retained in the employee's pending file at the supervisor's discretion.

## **VII. IMPLEMENTATION OF RECOMMENDATIONS:**

- A. The department management will determine if participation by employees in counseling and/or training is mandatory or voluntary for the employees.
  1. The division commander will make a determination as to whether the referral will be mandatory or suggested.

2. In the event the division commander determines that attendance for the referral is mandatory, attendance shall be considered on-duty time and the officer's schedule will be adjusted accordingly.
- B. Transfers, training, and counseling, as a result of this program are not considered punitive or a disciplinary action.