

Village of Oak Park, IL

Emergent Issues Memo



Submitted by:

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Table i: Emergent Issues Memo Updates

Version	Date	Update Reason
1	03/28/2022	Initial Version
2	06/03/2022	Police Department Action Steps appended to document
3	06/11/2022	Additional Data Added to Table 2.1
4	06/13/2022	Finalized Police Action Steps formatting
5	06/15/2022	Language correction
6	06/18/2022	Language correction

1.0 Introduction

BerryDunn recognizes that its clients often have a sense of urgency around the receipt of certain assessment results, as this information can affect budget planning and other operational considerations. Moreover, in some cases, BerryDunn observes operational conditions at early stages of a project that would benefit from prompt attention, as opposed to waiting until the project report is finalized. For these reasons, our methodology includes presentation of critical initial findings and/or observations early in the project. This process, which is outlined immediately below, is also described in the Project Work Plan and Schedule.

Phase 3: Stakeholder Engagement

Task 3.3: Develop Emergent Issues Memo. Our initial analysis of data collected in Phase 2 [Data Collection and Preliminary Interviews], and the information collected during interviews in Phase 2 and Tasks 3.1 [Conduct Individual Interviews and Internal Group Discussions] and 3.2 [Conduct External Group Discussions], will focus on identifying of any major procedural gaps or inefficiencies, or other issues creating a substantial risk to the department. Based on this initial analysis, we will prepare an Emergent Issues Memo that will detail any significant operational challenges or emergent issues that require immediate attention. We will provide this document for the Village to review, and schedule a videoconference with project staff to discuss the details.

This document outlines the emergent issues identified by BerryDunn, as described in Task 3.3 above. Although this report intends to identify emergent issues that are time-sensitive, because of the preliminary nature of the information within this document, BerryDunn emphasizes that the information in this report is subject to change and/or revision, as additional information, data, or analysis conducted throughout the remainder of the project indicates.

BerryDunn will review this document with the Oak Park Police Department (OPPD) and other Village officials, and if appropriate, will revise it into a final version if necessary following that review.

2.0 Immediate Actions

During initial work on this operations assessment for the Village of Oak Park (Village), and the OPPD, BerryDunn identified five key areas that would benefit from prompt action. Those areas relate to the following:

- Operational Policies
- Data Collection
- Police Department Facility
- Data Use and Analysis
- Complaint Intake and Documentation

Table 2.1 (below) provides a list of BerryDunn’s immediate findings and recommendations, and each finding and recommendation is detailed further in this Section. Additionally, following delivery of this draft to the Village, the OPPD prepared a brief narrative response for each finding/recommendation. These have been added to Table 2.1 (unedited) and labeled, OPPD Response.

Table 2.1: Immediate Action Items

Chapter: Operational Policies			
No.	Finding	Recommendation	OPPD Response
1	Because the OPPD is using a mix of policies from its current manual and a new source (Lexipol), staff lacks clarity on prevailing policy, and in some cases, lack policy understanding.	The OPPD should implement practices to ensure that staff are clear on which policies are in force, and provide training so that staff understand the contents of all policies they are responsible for following.	In 2019, the Village contracted with Lexipol to assist the Police Department with reviewing, updating, and disseminating new policies. The Police Department has over 200 policies that need to be reviewed. Lexipol provides a comprehensive database of organizational tailored policies and procedures vetted by police professionals and public safety attorneys grounded in Illinois legislation and industry best practices. Lexipol also provides the department with a technology-based platform to facilitate daily training and comprehensive assessment tracking. Due to the quantity and mass overhaul of our current policies, the review and update process is still ongoing.

Chapter: Community Engagement			
No.	Finding	Recommendation	OPPD Response
2	The OPPD is not consistently collecting impartial-policing data on traffic stops and other non-consensual police contacts. Staff lacks clarity on this policy and how it should be applied. In addition, the OPPD does not collect or record subject data in its records management system (RMS) on all police-related contacts (including calls for service).	The OPPD should clarify its impartial-policing data collection policies, provide training to officers on applying these policies, and monitor compliance. In addition, the OPPD should develop and implement a policy for collecting subject data on all police-related contacts for entry into RMS.	In September 2018, a Training Bulletin was issued regarding Field Contacts which required a transition to an electronic form. This process mistakenly replaced the required Illinois Department of Transportation (IDOT) Pedestrian Stop Data Sheets. After the Training Bulletin was issued, officers no longer completed the proper IDOT form.
Chapter: Data, Technology, and Equipment			
No.	Finding	Recommendation	OPPD Response
3	There are numerous challenges with the current police facility, and it does not contribute to efficient and effective operations. More importantly, several security risks in the facility are likely uncorrectable, which create various liability and safety concerns for the Village and staff.	The Village should take steps to pursue a new police facility to improve operational efficiencies, to help ensure compliance with industry best practices and standards, and to reduce security and risk issues that exist within the current facility.	The Village hired FGM Architects to complete a Space Needs Assessment of the Oak Park Police Department. A report of the assessment was completed and presented to the Village Board in November 2019. In February 2020 the Village entered into a contract with FGM Architects to begin the Schematic Design phase of the project after selection of one of the options for a replacement Police Station. As a result of the COVID-19 Pandemic the project was put on hold. Funds have been budgeted in Fiscal Year 2022 to restart this project.

Chapter: Data, Technology, and Equipment			
No.	Finding	Recommendation	OPPD Response
4	The RMS in use by the OPPD is not supporting operational needs. The RMS has multiple limitations, including data entry and data mining, both of which are critical to leveraging data in support of operations and impartial policing.	The OPPD should pursue acquisition of a more modern and robust RMS that is capable of supporting its data needs.	The Village's Information Technology (IT) Department fully supports the RMS recommendation. A major step the IT Department took was to encourage the West Suburban Consolidated Dispatch Center (WSCDC) to use the Village's GIS address system which led to contract with the MGP. The GIS address system is equally important data to both the CAD and RMS systems. A more modern and robust CAD system is also being recommended. The CAD data is truly a different use from RMS, yet very important for data mining to support operations, analysis and innovation. Not all CAD data is necessarily transferred to RMS. The data quality and the data itself are important from both systems.

Chapter: Internal Affairs/Professional Standards			
No.	Finding	Recommendation	OPPD Response
5	The OPPD has policies that outline the Internal Affairs/Professional Standards complaint process and the associated investigations. These policies do not provide guidance on resolution of complaints occurring at the supervisor level that are not routed for informal or formal investigation, nor do they specify appropriate documentation practices for these instances.	The OPPD should provide clear policy on how minor complaints resolved by supervisors are documented. Policy should direct that all complaints received related to employee misconduct, whether resolved at the supervisor level or investigated as informal or formal complaints, should be consistently documented and stored in a central repository. All complaints, regardless of their categorization, should contain basic complaint and complainant information, and a summary of the supervisor's actions relative to the complaint.	In 2010, due to staffing issues, the Department's Professional Standards Unit was decentralized and patrol commanders were assigned to oversee officers' misconduct and citizen complaints for each of their respective platoons. In 2019, the Professional Standards Unit was transitioned from being decentralized to centralized with a sergeant assigned to Internal Affairs. Currently, the Administrative Commander is managing the Professional Standards process.

In some cases, the OPPD has already been working on aspects of the recommendations outlined in Table 2.1. BerryDunn encourages the OPPD to continue that work and to consider how the information provided in this report might inform those efforts. BerryDunn is also available as a resource to assist the OPPD with any of these processes.

A. Operational Policies

Although BerryDunn has not yet conducted a critical review of the OPPD policy manual, that review is one important aspect of the operational study BerryDunn is conducting on behalf of the Village and the OPPD. Sound, up-to-date, and well-understood policy represents the foundation of consistent, defensible policing, and it is imperative in today's policing environment that a department have clear written guidance regarding a wide range of topical issues.

BerryDunn is aware the OPPD has an extensive policy manual to provide guidance to personnel on operational rules and practices; however, BerryDunn has learned through formal and informal interactions with OPPD staff that the current policies for the OPPD include a mix of those from its original manual, and policies in a new platform, Lexipol. Staff expressed to BerryDunn that although they have been asked to sign off and acknowledge receipt of all new/revised Lexipol policies as they have been introduced, there has been little to no formal training as a part of this process. Moreover, staff indicate a lack of clarity over prevailing policy, and in some cases, a lack of policy understanding.

For policies to be effective, it is important for staff to know which policies are in effect and govern their actions. From an accountability and best-practices perspective:

- All policies, directives, or other governing orders, should be located in a single repository, to help ensure it is clear to staff which policies are active and in force
- Dissemination and receipt of all policy additions or revisions should be documented for each affected staff member
- Staff should be provided with sufficient time to review and ask questions about any new or revised policy, and an appropriate level of training, consistent with the content of the new or revised policy and its scope

The OPPD should take steps to ensure that staff are clear on which policies are in force. In addition, the OPPD should implement a policy dissemination and documentation plan for any new or revised policies that includes a review and question period, and appropriate training. The review, question, and training processes could occur through various mechanisms, such as online review and testing, roll-call training, or supervisor/officer-led training, for example.

BerryDunn will provide additional recommendations as appropriate, as part of the critical policy review process for this project. This recommendation, however, is the baseline for the overall policy review process, and it is also critical from a risk management, accountability, and transparency perspective.

B. Data Collection

Given the societal concerns over biased policing, it is important for the OPPD to consistently collect observed race and gender data (as part of its impartial-policing strategy) regarding all community member contacts that result in any type of documentation of police efforts. In addition to collecting this data, the OPPD should also help ensure the collection of data that

documents what occurred within the contact or as a result of the contact. This includes, for example, documenting whether the contact resulted in a warning, citation, arrest, pat-down or other personal search, a search of the person's vehicle or other property, or whether the person was detained and/or handcuffed.

The OPPD has established policies and practices for collecting impartial-policing racial profiling data on traffic stops and other non-consensual police contacts. Based on BerryDunn's review of the OPPD's current data in these areas, and conversations with OPPD staff, BerryDunn has determined that this data is not being collected consistently and there is a lack of clarity among staff on this policy and how it is applied.

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

In addition, BerryDunn has learned the OPPD does not collect and record subject and incident data in its RMS on all police-related contacts (including calls for service), which is an industry best-practice. Although some of this data is reported through notes added to the computer aided dispatch (CAD) record, this data is not searchable, it cannot support monitoring of police-subject contacts in furtherance of impartial-policing practices, it does not support intelligence-led-policing (ILP) or criminal investigation efforts, and it makes compliance with freedom of information act (FOIA) requests more difficult.

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

C. Police Department Facility

The operational assessment BerryDunn is conducting for the Village includes a review of the Police Department facility. The team from BerryDunn had an opportunity to tour the police facility on Thursday, February 17, 2022, during a planned on-site visit. Although this information will also be included in the full report, this recommendation is being provided in advance of that document to aid the Village in any planning and budgeting efforts.

During the tour, BerryDunn noted numerous challenges with the current police facility that adversely affect efficient and effective operations. BerryDunn observed issues in the following areas:

- Site Security
- Operational Flow
- Interview Rooms
- Training and Meeting Rooms

- Storage
- Evidence Preparation, Intake, and Management
- Holding Cells
- Transport Access
- Locker Rooms and Facilities

The observed deficiencies in these areas work against operational effectiveness and create various liability and safety risks for Police Department and Village staff. Additionally, it is likely that many of these issues are not correctable, given the limitations of the current space. BerryDunn has provided additional details for each of these areas in Appendix A of this document.

BerryDunn's observations in this memo represent an overview of readily observable facility conditions. However, this memo is not intended to outline the entirety of the shortcomings of the current facility, nor is it intended to fully express the operational needs of the Police Department, including space requirements. Despite these limited parameters, BerryDunn recommends that the Village pursue plans for a new police facility to aid the efficient and effective delivery of public safety services to the Village, and its residents and visitors.

D. Data Use and Analysis

The work BerryDunn is conducting for this project relies heavily on data. This is particularly true for examining workloads in patrol, investigations, and other specialty assignments, and in evaluating various data related to impartial policing. During initial data-gathering efforts and staff interviews, BerryDunn learned that the OPPD is operating under numerous operational constraints due to the poor functionality of the current RMS. In short, the RMS in use by the OPPD is not supporting operational needs and it has multiple limitations, particularly in the areas of data entry and data mining, both of which are critical to leveraging data in support of operations, transparency, and impartial policing.

At several points during the data gathering process, BerryDunn learned that the OPPD did not have the ability to extract important data from its own systems. These limitations exist for a combination of reasons, which include the system design, system knowledge and training, and overall system functionality. These factors limit the ability of the OPPD to enter, extract, and analyze numerous data, many of which are vital to police operations, and for transparency and monitoring of impartial-policing practices.

Most modern RMS software products have significant capabilities and BerryDunn has provided a sample list of these in Appendix B of this memo. Although the current RMS in use by the OPPD does satisfy some of these elements, the system is outdated, and support from the vendor has been focused on newer products in its suite (and end-of-life support for this product could occur at any time). BerryDunn is aware that the OPPD has sought external support to maximize the use of its current RMS system. This is no-doubt providing the department with

some much needed expertise. Despite this, BerryDunn cautions the Village about making a substantial investment in the current system, as it is likely that regardless of that effort, the system will not perform at a level that is commensurate with the future needs of the OPPD.

Based on BerryDunn's observations, the OPPD should pursue acquisition of a more modern and robust RMS that is capable of supporting its data needs. BerryDunn also notes here that acquiring a new RMS is not a small task. Doing so requires substantial time and planning and it involves multiple significant steps. BerryDunn recognizes these challenges and acknowledges that the OPPD cannot remain in a state of stasis as efforts to acquire a new system proceed. Accordingly, BerryDunn recommends that the OPPD cautiously make necessary adjustments to its current RMS to support immediate operational needs, while simultaneously pursuing a replacement system.

Additionally, because of the critical integration between RMS and CAD, the Village should also examine the CAD (and mobile) system to determine whether it is capable of meeting the current and emerging needs of the OPPD. Given the noted constraints with the RMS, it is likely that CAD has similar functional challenges, which may also suggest the need for replacement.

E. Complaint Intake and Documentation

The need for police departments to engage objective and transparent accountability practices is at an all-time high, and, for good reasons, communities around the country have called for significant improvements in these areas. For the Village of Oak Park, as a part of this project, BerryDunn has been asked to examine the effectiveness of the civilian police oversight committee (CPOC), with respect to its role within the police accountability process. That work is ongoing and will be outlined in the final report; however, BerryDunn has identified specific aspects of the accountability practices of the OPPD that are in need of more immediate attention.

As expected, the OPPD has policies that outline the Internal Affairs/Professional Standards complaint process and the associated investigations. Although these policies are extensive, they do not provide guidance on resolution of complaints occurring at the supervisor level that are not routed for informal or formal investigation, nor do they specify appropriate documentation practices for these instances.

During interviews with staff, BerryDunn learned that minor complaints (e.g., rudeness, driving behavior) are sometimes managed at the supervisor level, without the generation of a formal complaint document, or other informal documentation. This is not uncommon in police agencies, and in many cases a citizen may prefer an informal resolution (having someone talk to the officer), as opposed to filing a complaint, which might result in the officer getting in trouble. Again, not uncommonly, within the OPPD, some of these incidents have been documented in various informal manners, while others have not been documented at all.

BerryDunn has observed that these types of inconsistencies are often the result of informal or unwritten practices, unclear policies, or a lack of understanding of what constitutes a complaint; these same factors appear to apply to the OPPD. Supervisory staff BerryDunn spoke with

related various understandings of what to do with minor complaints, and each with their own interpretations of what is appropriate and acceptable.

To resolve this gap, the OPPD should provide clear policy on how minor complaints resolved by supervisors are documented. Policy should direct that all complaints received related to employee misconduct, whether resolved at the supervisor level or investigated as informal or formal complaints, should be consistently documented and stored in a central repository. All complaints, regardless of their categorization, should contain basic complaint and complainant information, and a summary of the supervisor's actions relative to the complaint.

Due to the importance of this subject area, BerryDunn also wishes to provide some additional context. BerryDunn found no evidence or indication that those wishing to file a complaint have been dissuaded from doing so, nor were there any indications that supervisors, either individually or collectively, were failing to document informal performance matters for improper purposes. Instead, all of the supervisors that BerryDunn met with appeared to take their role in the accountability process seriously, and all seemed willing to follow any expectations for them in that regard.

Summary:

As noted in the beginning of this document, the recommendations in this memo represent pressing items that BerryDunn believes the Village and the OPPD should begin to pursue immediately. In some instances (e.g., facility, RMS), the urgency relates to lengthy timelines, which will only be extended by waiting until the final report is completed. Other recommendations point to more significant operational needs, and for the reasons noted, these demand more immediate attention.

Several of the recommendations in this memo are also a subset of a larger part of the overall study, and additional recommendations may be offered in those areas as part of the final report.

The OPPD has produced a series of action steps based on the initial draft of this document. That information has been appended to this memo; see Appendix C.

APPENDIX A: Police Facility

The following outlines BerryDunn's observations of the OPPD facility, which is located in the basement of Village Hall.

- **Site Security**
Entry into the Police Department is controlled; however, most of the operational areas of the facility do not have controlled access points. Once inside the facility, individuals have nearly complete access to all work units, personnel, equipment areas, locker rooms, and confidential information. Although some areas within the facility are locked, in many cases, these involve key entry without the ability to track who has accessed a restricted area.
- **Operational Flow**
The layout and structure of the facility is counterproductive to efficient operational interactions. The facility has many small unconnected rooms positioned throughout a series of hallways. In many cases, supervisors are not positioned proximally to their followers, which interferes with operational communication and oversight. The facility structure also interferes with natural and intentional cross-unit interactions between personnel.
- **Interview Rooms**
The rooms used for suspect interviews are in the middle of the investigations work area. Those to be interviewed must walk through the work area, which creates numerous confidentiality and security issues. In addition, the interview rooms are in a poor state of repair, and they do not present a professional image. Lastly, due to space issues, the office for the investigations commander is in a room previously set aside to allow victims or witnesses to identify possible suspects through one-way glass. This means that victims and/or witnesses must enter the commander's office for this purpose. Again, this is not practical, and it raises operational challenges and confidentiality concerns.

There is also another room available to meet with crime victims that is outside of the investigations area. This room is stark and not visually appealing, which does not contribute to a positive setting for crime victims.

- **Training and Meeting Rooms**
The facility includes a firearms range, which is helpful for maintaining training and qualification standards for the officers. However, because the range is contained within Village Hall, using it during daytime hours is prohibited due to the sound issues this creates for the Village offices. There is one small conference room available; however, the room is not big enough to accommodate the full command staff.

Although the facility does have a room set aside for shift briefing, and this room has sufficient space, there is no room available to conduct larger training classes for staff, and there is no training room available for physical training, such as handcuffing and other required tactics training.

Lastly, the facility lacks a professional space, separated from the secure area of the police operations areas, to hold important meetings with the community and/or key stakeholders.

- Storage

There is a lack of storage for critical files, records, and equipment. Numerous small rooms and offices are packed with file cabinets and/or boxes, stacked and stored in an inefficient and inaccessible manner.

- Evidence Preparation, Intake, and Management

Properly securing evidence is a critical element of successful criminal prosecution. Ensuring it is secure, and that a proper chain of custody can be verified—throughout the life cycle of a piece of evidence—is a critical requirement. At present, officers must bag and label evidence in one area, and the items must then be brought to another area, which is not adjacent to the preparation area, to be secured. The lockers used for property storage, while functional, are not ideal. Officers must tag and hold a locker in the midst of processing evidence and writing their report, so that the proper evidence locker can be named in their paperwork (and not used by other staff during this process). Once secured in these lockers, the evidence custodian must retrieve each item and deliver it to another non-adjacent area for secure storage.

The evidence storage area, which is secured, is too small and not well laid out. The shelves are full, and numerous items are on the floor and not stored in a designated area. In addition, best-practices security protocols for access are lacking for drugs, firearms, cash, and other negotiables. These limitations create unnecessary risks for possible property loss, and for determining access and accountability, if necessary.

- Holding Cells

The Police Department has a need for temporary housing of detainees (generally under 48 hours), both male and female, pending their court appearance. The holding cells are old and susceptible to locking mechanism failures, which can and has resulted in detainees escaping into the common holding cell area. This creates a significant risk to other inmates, as well as to any staff who many need to enter the area to re-secure the individual or individuals. Also, in the male holding cell area, there is no water shutoff for the toilet, nor is there a suitable floor drain. This can and has resulted in detainees clogging the toilet, subsequently flooding the police facility.

In addition, the camera monitoring area for detainees is not immediately adjacent to the holding cells, which is not ideal. Again, due to the lack of other controlled access points, if an inmate escaped from the holding cell area, they would have nearly complete access to the entire police facility.

- Transport Access

Extreme care is required whenever a detainee is moved in or out of a police facility. Failure to do this can result in an escape attempt, and/or injury to the detainee or department staff. These transfer points, commonly referred to as a sally-port, should be fully secure, clear of unnecessary equipment, immediately connected to the holding cell area, and be independent of other operations. The current sally-port does not meet these criteria.

Emergency Medical Services (EMS/Ambulance) access is another configuration issue for the current sally-port. Due to its size and location, it is not possible for EMS to access the

sally-port. Any detainees requiring medical attention and/or transport, would need to be moved from the sally-port to an awaiting ambulance in an open-air environment. Again, this creates possible risk to the detainee and police staff.

- Locker Rooms and Facilities

Although there are separate locker rooms for male and female personnel, they are not modern and they lack functionality. The lockers are too small for the typical gear police officers must maintain, and they do not include electrical outlets for items such as flashlight and radio chargers. In addition, either the showers do not work, or they do not work consistently.

There is also a separate locker room for the sergeants. This room, which is shared by male and female sergeants, does not include restroom or shower facilities.

APPENDIX B: Technology Considerations

Table Appendix B-1: Field Technology Considerations

Function	Description
Driver's License Swipe or Bar Code Readers	These devices provide for easy data capture in the field, and they help ensure the integrity of the data that migrates into RMS.
Printers	Patrol vehicles should be equipped with printers, which are capable of producing e-citations, and printing of other custom forms (see below).
e-Citation	<p>An e-Citation system should be instilled in the squad cars. Here are some key elements of that system:</p> <ul style="list-style-type: none"> • Auto-importing of data from driver's license (D/L) readers, and from state department of motor vehicle (DMV) and (D/L) files • Ability to select from citation, written warning, verbal warning, or fix-it ticket, as appropriate, and the ability to print associated fine or other warning information, unique and specific to the type of action the officer chooses (e.g. citation or warning) • Embedded location addresses from CAD or other data repository • Embedded statutes and ordinance numbers • Ability to export the citation and all associated data directly into RMS when printed, to include DMV and D/L files • Auto-generation of case/citation file upon creation of the citation • Ability to integrate officer notes into the e-Citation at the time of issuance
Custom Forms	<p>Patrol vehicles should have the ability to use of custom forms, as developed for the department. These should include, at a minimum:</p> <ul style="list-style-type: none"> • Crash Information Exchange: The ability to use imported data from DMV and D/L files to create, print, and export driver and vehicle owner data, for motor vehicle crashes • Towing Form: The ability to use imported data from DMV and D/L files, to create and print a vehicle impound form • In all custom forms cases, the system should push these forms to the associated case file, to include creating or appending the Master Name Index (MNI) file. A copy of the file should also push to the RMS for storage. <p>Note: There are likely many other forms that would be helpful for this type of process, which could be identified through different sections of the department. In short, a system should be used that can generate and map these custom forms to the RMS.</p>
State Crash Report Integration	The system should integrate the Crash Information Exchange custom form, with the State Crash Reporting System. This system should auto-populate appropriate fields, and have the capability of pushing to the state system, as well as saving a copy of the state crash report to the local RMS.

Table Appendix B-2: RMS Functional Considerations

Function	Description
e-Citation Push	The RMS should have the capacity to push citation data directly to the State/Municipal court system. This should include a review queue for the department prior to submission.
Criminal Complaint Push	The RMS should have the capacity to interface with local or state prosecutors, so that data can be pushed directly into their systems for review and/or the development of a criminal complaint.
Case Generation	Officers (sworn or non-sworn) should be able to generate a new record within RMS, either through populating/generating one of the custom forms, through e-Citation, or through just starting a record on their own. They should have the ability to fully populate the record from data collected in the mobile environment.
Field Reporting	Officers in the field should have full access to the RMS from the field. This includes query capability, the ability to create, review, and print any police report, and the capacity to review any aspect of any case file, or documents or media stored within that file.
Media Storage	The RMS should have the capacity to store and hold any media files within the case record, to include: PDF or other office documents (Word, Excel), digital photographs, and digital recordings. (This is not intended for body camera or surveillance footage).
Solvability Factors	The RMS should have the capability of using Solvability Factors (and/or weighted Solvability Factors) for each case, and these should be a user-accessible function.
Case Management	<p>The RMS should have a robust case management system, which includes, at a minimum:</p> <ul style="list-style-type: none"> • A customizable routing system • Case management queues for each user • Case management views for appropriate supervisors • Tracking capabilities for time/effort on each case • Routing triggers associated with varied stages of the case review process

APPENDIX C: Police Department Action Steps



Memorandum

TO: Kevin J. Jackson, Village Manager
FROM: Shatonya Johnson, Interim Chief of Police
DATE: May 25, 2022
FOR: Village President Vicki Scaman and the Board of Trustees
SUBJECT: BerryDunn Emergent Issues Response

The purpose of this memorandum is to provide an Action Plan in response to the five emergent issues BerryDunn has identified during their assessment of police services.

BerryDunn identified five key areas that would benefit from prompt actions related to the following areas:

1. Operational Polices
2. Data Collection
3. Police Department Facility
4. Data Use and Analysis
5. Complaint Intake and Documentation

1. Operational Polices

Finding:

Because the OPPD is using a mix of policies from its current manual and a new source (Lexipol), staff lacks clarity on prevailing policy, and in some cases, lack policy understanding.

Recommendation:

The OPPD should implement practices to ensure that staff are clear on which policies are in force, and provide training so that staff understand the contents of all policies they are responsible for following.

Response:

In 2019, the Village contracted with Lexipol to assist the Police Department with reviewing, updating, and disseminating new policies. The Police Department has over 200 policies that need to be reviewed. Lexipol provides a comprehensive database of organizational

tailored policies and procedures vetted by police professionals and public safety attorneys grounded in Illinois legislation and industry best practices. Lexipol also provides the department with a technology-based platform to facilitate daily training and comprehensive assessment tracking. Due to the quantity and mass overhaul of our current policies, the review and update process is still ongoing.

Action Steps:

- Discontinue issuing Lexipol policies. **(implemented)**
- Format essential Lexipol policies to the General Order template. **(in progress)**
- A memorandum directing all personnel to utilize the General Orders, as the only department operational policies. **(forthcoming)**
- Include personnel at every rank in the implementation. **(in progress)**
- Continue converting General Orders to Lexipol policies. **(in progress)**
- Issue new policies when the conversion is over 60%. **(forthcoming)**
- Utilize the daily training bulletins from Lexipol to reinforce department policies. **(forthcoming)**

Barriers and Solutions:

- Some personnel may object due to the mix of policies.
- The solutions are to explain to personnel the implementation process, hold roll call training on the new policies; to retract and delete all replaced General Orders, solicit feedback and make necessary adjustments.
- A committee of volunteers from all ranks within the department was created to perform a comprehensive review of all policies.

2. Data Collection

Finding:

The OPPD is not consistently collecting impartial-policing data on traffic stops and other non-consensual police contacts. Staff lacks clarity on this policy and how it should be applied. In addition, the OPPD does not collect or record subject data in its records management system (RMS) on all police-related contacts (including calls for service).

Recommendation:

The OPPD should clarify its impartial-policing data collection policies, provide training to officers on applying these policies, and monitor compliance.

In addition, the OPPD should develop and implement a policy for collecting subject data on all police-related contacts for entry into RMS.

Response:

In September 2018, a Training Bulletin was issued regarding Field Contacts which required a transition to an electronic form. This process mistakenly replaced the required Illinois Department of Transportation (IDOT) Pedestrian Stop Data Sheets. After the Training Bulletin was issued, officers no longer completed the proper IDOT form.

Action Step:

- Generate a Training Bulletin on completing the Pedestrian Stop Data Sheet and require supervisors to review. **(in progress)**
- Issue a memorandum to inform personnel of the mandatory collection of data, along with the purpose and importance of said data. **(forthcoming)**
- Direct officers that the Pedestrian Stop Data Sheet is to be completed in addition to the Traffic Stop Data Sheet. **(forthcoming)**
- Instruct officers to generate the appropriate RMS ticket/event for any stop. **(in progress)**
- Work with the consultant to verify modules with RMS. **(completed)**
- Revert back to utilizing the state issued Pedestrian Stop Data Sheet. **(forthcoming)**
- Records personnel will enter the data collected from Pedestrian and Traffic Stops and report this to the State. **(forthcoming)**

Barriers and Solutions:

- Personnel may be confused about completing a Pedestrian Stop Sheet on every contact with a citizen, with the assumption the Field Contact Card was sufficient.
- The solution is to educate personnel through training bulletins and roll call trainings.

3. Police Department Facility

Finding:

There are numerous challenges with the current police facility, and it does not contribute to efficient and effective operations. More importantly, several security risks in the facility are likely uncorrectable, which create various liability and safety concerns for the Village and staff.

Recommendation:

The Village should take steps to pursue a new police facility to improve operational efficiencies, to help ensure compliance with industry best practices and standards, and to reduce security and risk issues that exist within the current facility.

Response:

The Village hired FGM Architects to complete a Space Needs Assessment of the Oak Park Police Department. A report of the assessment was completed and presented to the Village Board in November 2019. In February 2020, the Village entered into a contract with FGM Architects to begin the Schematic Design phase of the project after selection of one of the options for a replacement Police Station. As a result of the COVID-19 Pandemic the project was put on hold. Funds have been budgeted in Fiscal Year 2022 to restart this project.

Action Steps:

- The Department, in collaboration with the Public Works Department will continue to make the necessary modifications to address safety concerns, while FGM Architects advance through the project process.

Barriers and Solutions:

- The cost and location selection are two barriers.
- The Department will defer to the Village Manager's Office.

4. Data Use and Analysis

Finding:

The RMS in use by the OPPD is not supporting operational needs. The RMS has multiple limitations, including data entry and data mining, both of which are critical to leveraging data in support of operations and impartial policing.

Recommendation:

The OPPD should pursue acquisition of a more modern and robust RMS that is capable of supporting its data needs.

Response:

The Village's Information Technology (IT) Department fully supports the RMS recommendation. A major step the IT Department took was to encourage the West Suburban Consolidated Dispatch Center (WSCDC) to use the Village's GIS address system which led to contract with the MGP. The GIS address system is equally important data to both the CAD and RMS systems. A more modern and robust CAD system is also being recommended. The CAD data is truly a different use from RMS, yet very important for data mining to support operations, analysis and innovation. Not all CAD data is necessarily transferred to RMS. The data quality and the data itself are important from both systems

Action Steps:

- The Police Department will seek subject matter experts to determine detail requirements for a modern RMS and recommended solutions. A holistic approach of including ancillary systems will be required. **(forthcoming)**
- The Department can add subject matter experts in the budget. **(forthcoming)**
- The Department will continue conversations with WSCDC to review current status of various systems and long-term system plans. **(in progress)**

Barriers and Solutions:

- The cost and time are two barriers.
- The Department will defer to the Village Manager's Office.

5. Complaint Intake and Documentation

Finding:

The OPPD has policies that outline the Internal Affairs/Professional Standards complaint process and associated investigations. These policies do not provide guidance on resolution of complaints occurring at the supervisor level that are not routed for informal or formal investigation, nor do they specify appropriate documentation practices for these instances.

Recommendation:

The OPPD should provide clear policy on how minor complaints resolved by supervisors are documented. Policy should direct that all complaints received related to employee misconduct, whether resolved at the supervisor level or investigated as informal or formal complaints, should be consistently documented and stored in a central repository. All complaints, regardless of their categorization, should contain basic complaint and complainant information, and a summary of the supervisor's actions relative to the complaint.

Response:

In 2010, due to staffing issues, the Department's Professional Standards Unit was decentralized and patrol commanders were assigned to oversee officers' misconduct and citizen complaints for each of their respective platoons. In 2019, the Professional Standards Unit was transitioned from being decentralized to centralized with a sergeant assigned to Internal Affairs. Currently, the Administrative Commander is managing the Professional Standards process.

Action Steps:

- Review language of current General Orders and the Citizen Police Oversight Committee's (CPOC) complaint procedures. **(completed)**
- Update the General Orders and CPOC's procedures to reflect all complaints and operational inquiries. **(forthcoming)**
- Create a Laserfiche form to properly document all citizen's inquiries. **(in progress)**

Barriers and Solutions:

- CPOC's procedures are outdated and a revision of those procedures would be a lengthy process.
- The solution is to begin the conversation and develop a plan to address the outdated CPOC's procedures.