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GENERAL

*REVIEW OF THE CHICAGO. POLICE
DEPARTMENT'S MANAGEMENT OF SCHOOL.;; '
RESOURCE OFFICERS " .:*

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TO THE MAYOR, THE CHAIR OF THE COMMITTEE ON PUBLIC SAFETY, THE CITY COUNCIL, THE CITY CLERK, THE CITY TREASURER, AND THE RESIDENTS OF THE CITY OF CHICAGO:

The Public Safety Section (PS) of the City of Chicago Office of Inspector General (OIG) has concluded a review of the Chicago Police Department's (CPD or the Department) management of School Resource Officers (SRO) assigned to Chicago Public Schools (CPS). OIG has concluded that CPD's recruitment, selection, placement, training, specification of roles and responsibilities, and evaluations of its SROs are not sufficient to ensure officers working in schools can successfully execute their specialized duties.

OIG reviewed CPD's recruitment, selection, placement, training, specification of roles and responsibilities, and evaluation of its SROs assigned to CPS. OIG determined that, since December 31, 2016, CPD has assigned officers to CPS without a current legal agreement between the two agencies. Neither CPD nor CPS is able to provide an up-to-date list of SROs and the school locations to which these officers are assigned. Rather, CPD provided a list last updated in March 2017, while CPS provided a list current through 2014.

CPD currently lacks Department directives to address SRO-specific recruitment, selection, placement, training, or evaluation. Moreover, CPD's current processes for recruiting, selecting, placing, training, specifying roles and responsibilities, and evaluating SROs do not reflect best practices-as none have been adopted by CPD. Yet best practice standards exist. For example, in 2017, the U.S. Department of Justice (DOJ) and U.S. Department of Education (ED) released a set of resources entitled the SECURE Local Implementation Rubric and SECURE State and Local Policy Rubrics- to help both local education agencies and law enforcement agencies develop SRO programs that foster school safety without violating students' civil rights or unnecessarily involving students in the criminal justice system. CPD's current lack of guidance and structure for SROs amplifies community concerns and underscores the high probability that students are unnecessarily becoming involved in the criminal justice system, despite the availability of alternate solutions.

For the benefit of CPS students, their families, and the Chicago community at large, within this report, OIG provides

CPD with recommendations for the Department to

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establish an SRO program aligned with national best practices. To that end, OIG recommends that CPD,

- draft and implement a Memorandum of Understanding (MOU) in collaboration with CPS and community stakeholders that, amongst other areas, states:
 - o the purpose of the SRO partnership;
 - o outlines the roles and responsibilities of CPD, CPS, and principals in schools; and
 - o emphasizes that SROs should not be involved in routine student disciplinary matters;
- collaborate with CPS, students, families and the community to establish hiring guidelines for SROs;
- establish and require initial and ongoing training for officers assigned as SROs;
- establish performance evaluations aligned with established SRO roles and training that measures the ability of SROs to de-escalate situations and use alternatives to student arrest;
- designate a program coordinator to enhance coordination and accountability; and
- maintain and regularly update rosters of officers assigned to CPS.

Due to the high level of significance this issue holds within the community and in order to bring much sought-after clarity and resolution to this topic, OIG requested a prompt response from CPD detailing: (1) the Department's response to the findings; and (2) its intended actions to remedy this current state of affairs. OIG encouraged CPD and CPS to resolve these issues prior to the start of the 2018-2019 school year, so that CPS students could benefit from a functional SRO program rooted in national best practices as soon as possible. CPD, in turn, requested a 30-day extension for its response to this report. As a result, OIG received CPD's response on September 4, 2018 -the first day of school for the current school year.¹

In their response, CPD concurred with many of the findings and recommendations detailed in the report. CPD's response indicated that the Department will:

- Undertake best efforts to enter into an MOU with CPS that clearly delineates authority and specifies procedures for CPD officer interaction with students while on school grounds;

¹ See Appendix F

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- Develop a policy that defines roles, responsibilities, and appropriate actions of SROs, which will include an express prohibition on the administration of school discipline by CPD officers and provisions for the collection, analysis, and use of data regarding CPD activities in schools;
- Develop and implement screening criteria to ensure SROs have the qualifications, skills, and abilities necessary

to work safely and effectively with students, parents/guardians, and school personnel; and

- Ensure that all SROs receive initial specialized training and annual refresher trainings, and encourage SROs to exercise discretion to use alternatives to arrest and referral to juvenile court.

OIG acknowledges CPD's expressed commitment to making these necessary reforms. However, the reforms proposed by CPD in their response did not address other crucial areas of concern outlined in the report. Specifically, CPD did not acknowledge or respond to the following recommendations outlined in the report:

- To include a broad range of community stakeholders in the creation of the MOU;
- To create hiring guidelines and include a broad range of community stakeholders in the process;
- To state the purpose of the SRO partnership with CPS in the MOU;
- To define the data and information that will be shared between CPD and CPS;
- To establish performance evaluations for SROs; and
- To maintain and regularly update rosters of SROs.

Last, CPD indicated that their proposed changes will be implemented as part of the consent decree before the start of the 2019-2020 school year. CPD's failure to act more expeditiously to implement the reforms prior to the next school year leaves students, teachers, parents, and community stakeholders in the current school year without the protections and assurances of a school safety program that is aligned with national best practices.

We thank CPD management and staff, especially the Bureau of Patrol, along with CPS personnel for their cooperation with this review

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Respectfully,

Joseph Lipari
Deputy Inspector General, Public Safety City of Chicago

cc Charise Valente, General Counsel, CPD
Dana M. O'Malley Assistant General Counsel, CPD Robert Boik, Chief of Staff,
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CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

I. INTRODUCTION

The Public Safety Section (PS) of the City of Chicago Office of Inspector General (OIG) has concluded a review of the Chicago Police Department's (CPD) management of School Resource Officers (SRO). OIG found that CPD currently assigns SROs to CPS schools absent any identifiable program or programmatic support at the Department level. Since December 31, 2016, CPD has assigned SROs to Chicago Public Schools (CPS) without a current legal agreement between the two agencies. Moreover, CPD currently has no General or Special Orders, or policies or procedures that guide recruitment, selection, placement, training, roles and responsibilities, or performance evaluation for CPD officers that are assigned as SROs.² CPD's current processes for recruiting, selecting, placing, training, determining roles and responsibilities, and evaluating the performance of SROs do not reflect national best practices. OIG's examination also revealed that the level of collaboration necessary to achieve national best practices and goals does not currently exist between CPD and CPS. As a result, CPD cannot presently ensure that the officers working in CPS have either the programmatic support and/or the skills necessary to successfully execute their specialized duties. OIG therefore recommends that CPD, in collaboration with CPS, develop and implement a Memorandum of Understanding (MOU) that establishes a comprehensive SRO program that includes guidelines for SROs' recruitment, selection, placement, training, roles and responsibilities, and evaluation.

II. BACKGROUND

Across the country, sworn local law enforcement personnel are assigned to public school districts as SROs to help ensure school safety and security. Nationally, SRO programs generally are established as "collaborative efforts by police agencies, law enforcement officers, educators, students, parents, and communities" with the ultimate goal of "providing] safe learning environments ... foster[ing] positive relationship with our nation's youth, and develop[ing] strategies to resolve problems affecting our youth with the objective of protecting every child so they can reach their fullest potential."³ As a result, law enforcement officers assigned to work in public

¹ See Appendices A and C. The Department does have a General Order regarding investigations in schools that provides guidance for Department members interviewing, interrogating, or taking students into custody. However, it does not address SRO recruitment, selection, placement, training, roles and responsibilities, or evaluation. City of Chicago, "General Order G04-01-02 Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/clata/a7a57b9b-15f92c9d-af615-f92c-d8eabG458bcad279.pdf?hl=true>

³ *To Protect and Educate The School Resource Officer and the Prevention of Violence in Schools* (National Association of School Resource Officers, 2012), 3, accessed July 13, 2018, <https://nasro.org/cms/wp-content/uploads/2013/11/NASRO-To-Protect-and-Educate-nosecurity.pdf>

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schools may be expected to fill a number of roles." According to the National Association of School Resource Officers (NASRO), an SRO serves as an "educator, informal counselor, and law enforcer."⁵ The Department of Justice (DOJ) and the Department of Education (ED) suggest that school districts, local law enforcement agencies, students, families, and community advocates work collaboratively to determine the specific role and responsibilities of SROs in their schools.⁶

A. NATIONAL BEST PRACTICES FOR SCHOOL RESOURCE OFFICER PROGRAMS

To assist schools interested in developing and maintaining "appropriate" and "effective" SRO programs, DOJ and ED released the 2017 SECURE Local Implementation Rubric and SECURE State and Local Policy Rubric (The National Rubrics).⁷ According to ED, when school districts and police departments work in partnership to develop programs using these guidelines, SROs are better prepared to foster school safety without violating students' civil rights or unnecessarily involving students in the criminal justice system.⁸ The National Rubrics counsel that such school district/police department partnerships,

- be grounded in an intergovernmental MOU that, among other things, outlines SROs' roles and responsibilities, while explicitly stating that SROs should never intervene in routine student disciplinary matters⁹;

⁴ *To Protect and Educate The School Resource Officer and the Prevention of Violence in Schools* (National Association of School Resource Officers, 2012), 3, accessed July 13, 2018, <https://nasro.org/cms/wp-content/uploads/2013/11/NASRO-To-Protect-and-Educate-nosecurity.pdf>

⁵ *To Protect and Educate The School Resource Officer and the Prevention of Violence in Schools* (National Association of School Resource

Officers, 2012), 3, accessed July 13, 2018, <http://nasroorq/cms/wp-content/uploads/2013/11/NASRO-To-Protect-and-Educate-nosecurity.pdf>

⁶ Secretary John B. King, Dear Colleague (U S Department of Education, September 8, 2016), 2, accessed July 13, 2018, <https://www2.ed.gov/policy/qen/qauid/school-discipline/files/ed-letter-on-sros-in-schools-sept-8-2016.pdf>

⁷ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U.S Department of Education and U S Department of Justice, September 8, 2016), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric (U S Department of Education and U S Department of Justice, September 8, 2016), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>

⁸ Secretary John B King, Dear Colleague (U S Department, of Education, September 8. 2016) 2, accessed July 13, 2018, <https://www2.ed.gov/policy/qen/guid/school-discipline/files/ed-letter-on-sros-in-schools-sept-8-2016.pdf>

⁹ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

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- involve collaboration with community stakeholders on hiring guidelines that focus on officers' qualifications for working with young people in a school environment¹⁰;
- establish policies for school-specific training for officers before they begin working as SROs and that they have regular refresher trainings¹¹;
- continually evaluate SROs in a manner that incorporates feedback from school staff, school administrators, students, and families¹²; and
- develop performance measures to track SROs' effective use of alternatives to citations, tickets, and arrests.¹³

B. CPD OFFICERS IN CHICAGO PUBLIC SCHOOLS

CPD has been assigning sworn officers as SROs in select CPS schools for decades. Until 2006, CPD's SRO program was managed through a dedicated, Department-level School Patrol Unit. In 2006, CPD disbanded the School Patrol Unit, delegating responsibility for SROs to each district from which SROs are assigned to individual schools.¹⁴ According to CPD, this allows school sergeants and district commanders to more effectively supervise the SROs in their districts and to better address each school's unique needs. According to CPS, 74 schools¹⁵ had officers assigned as SROs during the 2017-2018 school year. Those 74 schools with assigned SROs are encompassed within 21 of the 22 police districts (all but Police District 14).

¹⁰ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U.S Department of Justice), 2, accessed July 13, 2018, <https://www7.ed.gov/documents/press-releases/secure-implementation.pdf>. " Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018. <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>.

¹² Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

¹³ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

■• Yana Kunichoff, "Police in Chicago Public Schools Operate with No Special Training and Little Oversight," Chicago Reader. February 1, 2017. accessed July 13, 2018, <https://www.chicagoreader.com/chicacio/police-public-schools-cpd-cps-misconduct-training/Content?oid=25347810>

""5 See Appendix D for the complete list of 7 A schools provided by CPS

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FIGURE 1: SCHOOL RESOURCE OFFICER PLACEMENT BY POLICE DISTRICT

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CPD identified SROs' primary responsibilities as: ensuring the safety of students in • schools; preventing interruptions to the school day; maintaining order; and preventing trespassing on school property. Over time, CPS has narrowed the number of situations in which school staff should involve SROs or other CPD officers. According to the CPS Student Code of Conduct, school administrators should contact CPD only in the event of criminal activity or an emergency.¹⁶ The Student Code of Conduct outlines what definitely constitutes criminal conduct and what may constitute criminal conduct.¹⁷ It also includes a list of factors school staff and administrators should consider before involving CPD in any student matter.¹⁸ Those factors include the student's age, whether the student's actions resulted in physical injury or endangered others, the seriousness of the criminal violation, and the harm

Student Code of Conduct (Chicago Public Schools, September 5, 2017), 11-13, accessed July 13, 2018, [http://cps.edu/SiteCollectionDocuments/SCC...StudentCodeConduct English pdf](http://cps.edu/SiteCollectionDocuments/SCC...StudentCodeConduct%20English.pdf) " Student Code of Conduct (Chicago Public Schools, September 5, 2017), 11-13. accessed July 13, 2018, http://cpsedu/SiteCollectionDocuments/SCC_StudentCodeConduct_Enqlish.pdf ¹³ Student Code of Conduct (Chicago Public Schools, September 5, 2017), 11 13, accessed July 13, 2018, [hi.tp//cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduc.LEnglish.pdf](http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_Enqlish.pdf)

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caused by the student's actions.¹⁹ School officials must notify CPD whenever students are found with illegal drugs, narcotics, controlled substances, "look-alikes" of controlled substances, or firearms.²⁰

According to CPS, teachers should never directly contact the school's SRO to intervene in a non-criminal matter. Instead, teachers should refer issues with students to school principals or administrators. Even in emergencies, teachers should call 911 rather than the school's SRO. In interviews with OIG, CPD stated that they try to respect CPS' request to use methods other than arresting students. However, according to CPD, once SROs become involved, they may have no choice but to arrest students depending on the circumstances of the incident.

¹⁰ Student Code of Conduct (Chicago Public Schools, September 5, 2017), 12, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf; ¹¹ Student Code of Conduct (Chicago Public Schools, September 5, 2017), 11, accessed July 13, 2018, http://cpsedu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf

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III. CPD DOES NOT HAVE A CURRENT INTERGOVERNMENTAL AGREEMENT WITH CPS THAT GOVERNS THE RECRUITMENT, SELECTION, PLACEMENT, TRAINING, ROLES AND RESPONSIBILITIES, AND EVALUATION OF SROs

A. THE SRO PROGRAM HAS OPERATED WITHOUT A CPD-CPS INTERGOVERNMENTAL AGREEMENT SINCE JANUARY 1, 2017

According to DOJ and ED, a detailed MOU is essential to building and maintaining "appropriate" and "responsible" partnerships between schools and law enforcement agencies.²¹ At a minimum, the terms of the MOU should:

*"... Meet constitutional and statutory and civil rights requirements including Federal, State, and local prohibitions on discrimination on the basis of race, color, national origin, language status, religion, sex, sexual orientation, and disability; on the use of excessive force; and on improper searches, seizures, or interrogations. "*²²

However, CPD and CPS have no current MOU or legal agreement that would meet this national best practice and

standard. CPS and CPD's most recent agreement, which was a renewal of their initial Intergovernmental Agreement (IGA) from 2013, expired on December 31, 2016.²³ OIG spoke with both CPD and CPS on separate occasions, at which time representatives from both agencies confirmed that the only document that exists is the expired legal agreement from 2016. For more than an entire school year, CPS and CPD have operated without a current formal agreement that defines the roles and expectations of SROs functioning in schools.

Even while in effect, the since-expired IGA provided limited guidance relating to SRO recruitment, selection, placement, training, roles and responsibilities, and

²¹ According to the SECURE State and Local Policy Rubric, appropriate and responsible partnerships have "the goal of preventing unnecessary or inappropriate arrests, referrals to law enforcement, contact with the juvenile justice system, and violations of civil rights laws" Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>

■ ²² Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

City of Chicago, "Authorize the First. Renewal of Intergovernmental Agreement with Chicago Police Department for School Patrol Services," December 16, 2015, accessed July 13, 2018, https://www.cpsboe.org/content/actions/2015_12/15-1216-PR8.pdf

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performance evaluations. For example, the only qualifications for becoming an SRO under the expired IGA included a working knowledge of CPS's Student Code of Conduct and completing standard police officer training.²⁴ The IGA did not address how a prospective SRO's working knowledge of the CPS Student Code of Conduct would be confirmed or when and how SROs should respond to violations of the Student Code of Conduct. The IGA also did not require any specialized training on working with youth in an educational setting.²⁵

In interviews with OIG, CPS stated that it is currently working with CPD, student groups, and advocacy groups to draft an MOU. According to CPS, the MOU will provide a detailed description of SRO roles and responsibilities, include guidelines for referring students to counselors, and outline protocols for taking students out of schools. CPS needs the Chicago Teachers Union and Fraternal Order of Police to approve the MOU before it can be implemented. CPS could not provide OIG with specific dates as to when a new MOU would be completed, considered effective, or implemented, but stated that it aims to put one into operation by the start of the new school year. CPD made no mention of this MOU or of working with CPS on its production.

B. CPD LACKS FORMAL SRO RECRUITMENT, SELECTION, AND PLACEMENT PROCESSES AND STANDARDS

In order to select officers for SRO positions, school districts and law enforcement agencies should collaborate on quality recruiting and hiring processes. The SECURE Local Implementation Rubric recommends that school districts and law enforcement agencies work together to create hiring guidelines that focus on officers' qualifications for working with young people in a school environment.²⁶ A wide range of stakeholders including school staff, students, parents, families, community members, and youth development experts should then interview qualified candidates.²⁷

• "City of Chicago, "Intergovernmental Agreement Between the City of Chicago and the Board of Education of the City of Chicago," accessed

July 13, 2018,

<http://www.cpsc.k12.il.us/purchasing/pdfs/contracts/2013...01/13-0123-PR12-I oclf>

³⁵ City of Chicago, "Intergovernmental Agreement Between the City of Chicago and the Board of Education of the City of Chicago." accessed July 13, 2018,

<http://www.cpsc.k12.il.us/purchasing/pdfs/contracts/2013...01/13-0123-PR12-I pdf>

²⁰ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> ²⁷ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

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CPD does not currently have any formal recruitment, selection, or placement processes for SRO positions. Instead, school sergeants and district commanders individually assign officers to SRO positions based on their assessments of each officer's temperament and skill set. Individual district commanders may decide to interview officers for SRO positions, but the Department does not require that candidates participate in an interview process for the positions.

C. TRAINING

In order to prepare officers to work with students in schools, the National Rubrics recommend that law enforcement agencies and school districts establish policies requiring school-specific training for officers before they begin working as SROs, as well as regular refresher trainings.²⁸

These trainings should emphasize alternatives to arresting students, as well as cover relevant topics such as:

Constitutional and civil rights; Childhood and adolescent development; Age-

appropriate response to student conduct; Disability and special education

issues; Conflict resolution and de-escalation techniques; Bias-free policing;

Responses to trauma; Restorative justice techniques; and

Interacting with specific student groups such as those with limited English proficiency, or who are lesbian, gay, bisexual, or transgender (LGBT).²⁹

²⁸ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>
²⁹ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>

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CPD stated that most SROs receive active shooter training and crisis intervention training. In the past, CPD's Juvenile

Intervention and Support Center has provided sexual assault training for SROs. CPD stated that it would be open to providing more training for SROs in alignment with best practices.

CPS last conducted training for all SROs on its revised Student Code of Conduct in 2013 (Appendix B). The Student Code of Conduct outlines inappropriate student behavior, disciplinary responses, and CPS' anti-bullying policy^{3,0} While it defines the rights and responsibilities of students, parents or guardians, school staff, and the chief executive officer, it does not provide any specific guidance for SROs or address their roles and responsibilities.³¹

D. NO FORMAL WRITTEN GUIDANCE EXISTS SPECIFYING THE ROLES AND RESPONSIBILITIES OF SROs

Neither CPD nor CPS has written roles or responsibilities for SROs. According to DOJ recommendations, MOUs should outline SROs' roles and responsibilities, while explicitly stating that SROs should never intervene in routine student disciplinary matters.³² SROs' responsibilities might include,

- handling calls for service in and around schools;
- conducting comprehensive safety and security assessments;
- developing emergency management and incident response systems based on the national Incident Management System and the four phases of emergency management: mitigation/prevention, preparedness, response, and recovery;
- developing and implementing safety plans or strategies;
- integrating appropriate security equipment/technology solutions;
- responding to unauthorized persons on school property;
- serving as liaisons between the school and other police agencies, investigative units, or juvenile justice authorities when necessary and consistent with applicable civil rights laws and privacy laws;

³⁰ Student Code of Conduct (Chicago Public Schools, September 5, 2017), 2-5, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC/StudentCodeConduct_Financial.pdf; Student Code of Conduct (Chicago Public Schools, September 5, 2017), 2-5, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC/StudentCodeConduct_English.pdf
³¹ Memorandum of Understanding Fact Sheet (U S Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, https://cops.usdoj.gov/pcj/f/2017AwardDocs/chp/MQU_Fact_Sheet.pdf

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- serving as a member of a multidisciplinary school team to refer students to professional services within both the school (guidance counselors or social workers) and the community (youth and family service organizations);
- developing and expanding crime prevention efforts for students; and
- developing and expanding community justice initiatives for students.^{7,3}

When asked for Department policies or procedures specific to SROs, CPD directed OIG to a General Order, last updated

in 1988, governing officers' investigations and investigative work products in CPS schools (Appendix A).³⁴ This General Order only outlines the protocol for any Department member interviewing, interrogating, or taking students into custody on or around school property.³⁵ It provides no guidance specific to SROs or their responsibilities.³⁶ Other than this directive, the Department stated that it only has informal policies and procedures that district commanders communicate to school sergeants through individual conversations and/or email communications.

E. THERE ARE PRESENTLY INSUFFICIENT CONTROLS, GUIDANCE, AND STANDARDS NECESSARY FOR EFFECTIVE PERFORMANCE EVALUATIONS OF SROs

DOJ and ED recommend that schools, school districts, and law enforcement agencies "... continually evaluate SROs and school personnel, and recognize good performance."³⁷ These evaluations should incorporate feedback from school staff, school administrators, students, and families.³⁰ DOJ and ED also recommend

³³ Memorandum of Understanding Fact Sheet (U S Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, https://cops.usdoj.gov/pdf/2017AwardDocs/chp/MOU_Fact_Sheet.pdf

City of Chicago, Chicago Police Department, "General Order G04-01-02¹ Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d6eab6458bcad279.pdf?hl=true>

³⁵ City of Chicago, Chicago Police Department, "General Order G04-01-02 Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d8eab6458bcad279.pdf?hl=true>

³⁶ City of Chicago, Chicago Police Department, "General Order G04-01-02 Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d8eab6458bcad279.pdf?hl=true>

³⁷ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/pieess-releases/secure-implementation.pdf>

Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/pieess-releases/secure-implementation.pdf>

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developing performance measures to track SROs' effective use of alternatives to citations, tickets, and arrests.³⁹

According to CPD, an SRO's job performance is evaluated in the same way as all other Department members, leaving the possibility that the evaluation may not necessarily capture their unique roles and functions as SROs. CPD provided OIG with a directive governing Department members' performance evaluations (Appendix C).⁴⁰ This directive lists five "performance dimensions" used to evaluate all Department members' performance:

- Accountability/Dependability⁴¹
- Problem Solving/Decision Making⁴²
- Adaptability/Responsiveness⁴³
- Communication⁴⁴
- Job Knowledge/Professional Development⁴⁵

None of these dimensions establish Department-wide performance measures specific to SROs' roles, such as the use of alternatives to arresting students.

³⁵ Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURe Local Implementation Rubric (U.S. Department of Education and U S Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

¹⁰ City of Chicago, Chicago Police Department, "Employee Resource E05-01 Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-C3dce7cd73e28d57.pdf?pdPhl=true>

¹¹ City of Chicago, Chicago Police Department, "Employee Resource E05-01 Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-C3dce7cd73e28d57.pdf?pdPhl=true>

City of Chicago, Chicago Police Department, "Employee Resource E05-01 Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-C3dce7cd73e28d57.pdf?pdPhl=true>

¹² City of Chicago, Chicago Police Department, "Employee Resource E05-01 Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-C3dce7cd73e28d57.pdf?pdPhl=true>

City of Chicago, Chicago Police Department, "Employee Resource E05-01 Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-C3dce7cd73e28d57.pdf?pdPhl=true>

¹⁵ City of Chicago, Chicago Police Department, "Employee Resource E05-01 Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-C3dce7cd73e28d57.pdf?pdPhl=true>

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Furthermore, SROs cannot be adequately evaluated on their Job Knowledge and Professional Development without policies, procedures, and training specific to their roles.

CPS stated that it does not conduct evaluations of SROs' job performance, but that principals may provide feedback about their school SRO to school sergeants and district commanders. Neither CPS nor the Board of Education evaluates SROs or their performance.

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IV. CPD DOES NOT MAINTAIN CURRENT ROSTERS OF OFFICERS WORKING AS SROs AND THE SCHOOLS TO WHICH THEY ARE ASSIGNED

In order to establish the number of officers currently assigned as SROs, OIG requested a roster of officers serving as SROs as of May 1, 2018 from CPD. According to CPD, the Bureau of Patrol maintains and updates this roster. In response, CPD provided OIG with a roster dated March 21, 2017, that included officers' names, whether they were assigned to cars or schools, which schools they were assigned to, whether the officers had received crisis intervention training, and the name of their supervising school sergeant.

In an effort to cross reference the list acquired from CPD, OIG also requested a roster of CPD officers currently serving as SROs from CPS. CPS stated that CPD officers currently serve as SROs at 75 schools, and directed OIG to CPD for the list of those officers.

OIG's Center for Technological Analysis (CITA) also attempted to verify the accuracy and completeness of the roster provided by CPD by comparing it to CPD's administrative data housed within OIG and discovered a number of inconsistencies between the two sources which could not be reconciled. For example, according to CPD's administrative records of officer assignments, not all of the officers listed on the roster had a school-related posting as of March 21, 2017^{41S}. Of the 164 officers on the roster, 15 did not have a school-related posting; these included 3 officers listed as beat relief officers, 1 listed as a desk officer, and 1 listed as a tactical team officer. Of the 21 sergeants on the roster, 9 did not have a school-related posting as of March 21, 2017, and 1 had not held a school-related posting since June 10, 2015. Due to these inaccuracies, OIG determined that the roster could not be used for a point-of-time count of SROs or school sergeants.

In order to provide students, families, and community members with basic information about the number of CPD officers currently serving as SROs, CITA used CPD and City of Chicago administrative data to try and determine the number of CPD officers assigned to CPS schools as of May 16, 2018.

OIG found that as of May 16, 2018, 220 sworn CPD officers held school-related postings. More specifically, 132 officers were posted at schools, 75 officers were posted to school cars or mobile school cars, and 13 sergeants were posted as school

⁶An officer's posting specifically indicates an individual officer's duties

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sergeants/⁷ However, CPD's administrative data also includes a number of internal inconsistencies between officers' postings compared to their assignments and details. While SROs and school sergeants are assigned to schools in their districts, only 197 of these 220 officers with school-related postings were assigned to a CPD district. For example, 10 officers were assigned or detailed to the Education and Training Division and 5 were assigned or detailed to the Human Resource Division. One SRO was assigned or detailed to the Marine Operations Unit. OIG could not resolve these inconsistencies.

The following figures contain officer demographics of age, race, and gender. The administrative data was extracted from the CPD database and the Chicago Integrated Personnel and Payroll Systems (CHIPPS). The CPD database provided current SRO officer assignments, and CHIPPS provided officer information including race, age, and gender. Due to the inconsistencies between CPD's records of officers' postings and assignments or details, OIG cannot confirm the accuracy of these summary statistics.

FIGURE 2: CPD OFFICER DEMOGRAPHICS BY AGE

Overall Average

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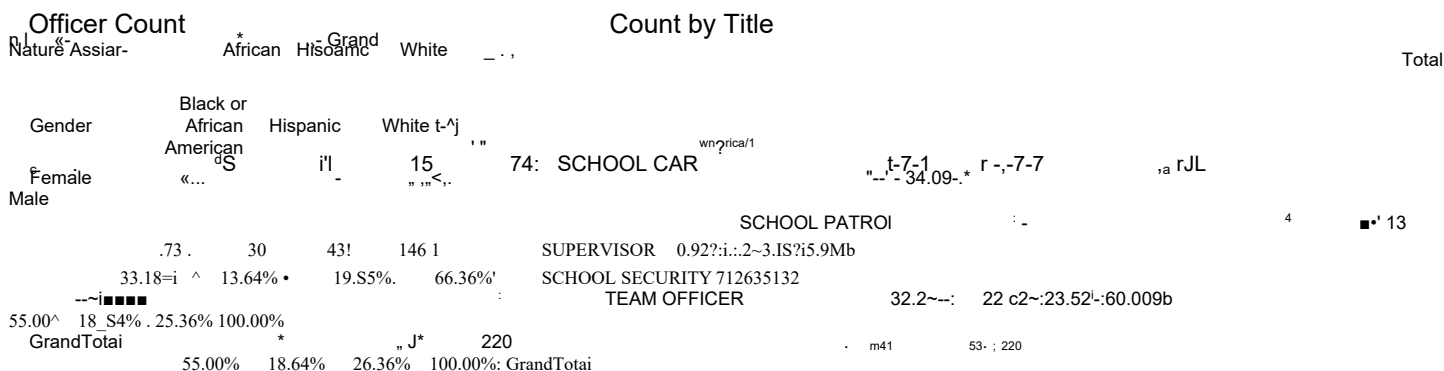
Current Age (bin)

"" SROs assigned to school cars are dedicated to a particular school, while SROs assigned to mobile schools cars patrol multiple schools According to CPD, school sergeants supervise the SROs assigned to schools in their districts

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FIGURE 3: CPD OFFICER COUNT AND TITLE DEMOGRAPHICS BY GENDER' AND RACE



As the data shows:

- Women made up 34% of officers assigned to schools, compared to 22% of the force as a whole.
- Men accounted for 66% of officers assigned to schools, compared to 77% of the force as a whole.
- The average age for officers currently assigned to schools was 46.8 years old, compared to the average age of 42.4 years for the force as a whole.
- Black officers accounted for 55% of SROs, compared to 21% of the force as a whole.
- Hispanic officers accounted for 18.6% of SROs, compared to 25% of the force as a whole.
- White officers accounted for 26% of SROs, compared to 50% of the force as a whole.

According to the terms of the expired IGA, CPD should twice annually provide CPS with documentation indicating which schools are assigned SROs, how many SROs are assigned to each school, and the names of the officers/⁸ However, according to CPS, CPD last provided a roster of officers in October of 2014. CPD should keep and maintain accurate records of SRO placements.

City of Chicago, "Intergovernmental Agreement Between the City of Chicago and the Board of Education of the City of Chicago," accessed July 13, 2018,

http://www.csr.cps.k12.il.us/purchasing/pdfs/contracts/2013_01/13-0123-PR12_1.pdf

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V. RECOMMENDATIONS

Partnerships between law enforcement agencies and school districts should be designed to ensure school safety and security, protect students' civil rights, and minimize any unnecessary student involvement in the criminal justice system.⁴⁹ In order to establish an effective and responsible SRO partnership with CPS that aligns with established best practices, CPD should do the following:

- Work with CPS, "juvenile justice entities, civil rights and community stakeholders" to draft and implement an MOU that "meets constitutional and statutory civil rights requirements."⁵⁰ The MOU should:
 - o State the purpose of the SRO partnership;
 - o Outline the roles and responsibilities of CPD, CPS, and schools;
 - o Emphasize that SROs should not be involved in routine student disciplinary matters;
 - o Define what information CPS and CPD will share;
 - o Establish required initial and ongoing training for officers assigned as SROs; and
 - o Establish performance evaluations aligned with SROs' established roles and training that measure SROs' ability to de-escalate situations and use alternatives to arresting students;⁵¹
- Collaborate with CPS, students, families, and community stakeholders to create hiring guidelines for SROs;⁵
- Create Department policies and procedures, aligned with best practices and the MOU, that address SRO recruitment, selection, placement, training, roles and responsibilities, and evaluation;
- Maintain and regularly update rosters of officers assigned to CPS; and
- Designate a program coordinator to enhance coordination and accountability

Secretary John B King, Dear Colleague (U S Department of Education, September 8, 2016), 1, accessed July 13, 2018, <https://www2.ed.gov/policy/cien/aiud/school-discipline/files/ed-letter-on-sros-in-schools-sept-8-2016.pdf>

~° Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation-pelf-1>
Memorandum of Understanding Fact Sheet (U S Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, <https://cops.usdoj.gov/pdf/2017AwardDocs/chp/MOU..FactSheet.pdf>

Safe School based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric (U S Department of Education and U S Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-1-implementation-1-ai.pdf>

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VI. CONCLUSION

To protect and serve students, it is vital that CPD make immediate changes to ensure the safe and productive engagement of SROs with students and their families. The Department must, in collaboration with CPS, develop a comprehensive SRO program that includes guidelines for SROs' recruitment, selection, placement, training, roles and responsibilities, and evaluation. OIG recognizes CPD has stated that it is committed to reviewing and revising directives and policies to align with best practices and to address concerns noted by the community. These policy updates, along with future mandates within the upcoming consent decree, will support the Department's efforts to build relationships with

the communities it serves based on mutual trust and respect. PS invited CPD to respond in writing to this review.

VII. AGENCY RESPONSE

In response to OIG's findings and recommendations, CPD identified the following steps they intend to take over the course of the next year:

- Undertake best efforts to enter into an MOU with CPS that clearly delineates authority and specifies procedures for CPD officer interaction with students while on school grounds;
- Develop a policy that defines SRO roles, responsibilities, and appropriate activities of SROs, which will include an express prohibition on the administration of school discipline by CPD officers and provisions for the collection, analysis, and use of data regarding CPD activities in schools;
- Develop and implement screening criteria to ensure SROs have the qualifications, skills, and abilities necessary to work safely and effectively with students, parents/guardians, and school personnel; and
- Ensure that all SROs receive initial specialized training and annual refresher trainings, and encourage SROs to exercise discretion to use alternatives to arrest and referral to juvenile court.

CPD did not address the following recommendations noted in the OIG report:

- Include a broad range of community stakeholders and CPS in the creation of the MOU;
- Create hiring guidelines and include a broad range of community stakeholders in the process;
- State the purpose of the SRO partnership with CPS in the MOU;
- Define information to be shared between CPD and CPS;

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- Establish performance evaluations for SROs that align with developed roles and training that measure SROs ability to de-escalate and use alternatives to arresting students; and
- Maintain and regularly update rosters of SROs.

The Department's letter responding to the findings in this report is included in Appendix F.

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VIII. APPENDIX A: CPD GENERAL ORDER G04-01-02: INVESTIGATIONS-CHICAGO PUBLIC SCHOOLS

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I. PURPOSE

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cf EducaScn property, eg., scfioal grounds, playgrounds, etc, dur*g the time periods when the scfvol Is Ji session.

II. GENERAL INFORMATION

- A. The Board or Education has a policy of Tu3y cooperating with Is* enforcement personnel conducting investigations within schools or adjacent Board of Education properties during tours »'«le classes are in session.
- B. School officials including a: principal or his designee are responsible for
1. verify/g Uie official SeJiCScallon -of a Department -member assigned to cSSzen's dress duty who enters a school for the purpose of T:er;ewr>g, .ratrogatog or arresting a student.
 2. providing the parents or guardian with a prompt notification whenever a Department member requests to interview, interrogate or take custody of a student or a student's behavior.
 3. submit/jtting To the parents or guardian during the TYlervle-a. or Informational of a SuJde.nl <http://SuJde.nl> by a Department member whenever the parents or guardian of the student cannot or are unavailable to respond to the school.
 4. notifying the parents or guardian of the s&jderrt concerning the results of the interview or interrogation of the student.
 5. releasing a student from the custody of a department member in all instances unless the responsible officer has reasonable grounds to believe the student is a danger to the community or when there is an outstanding arrest warrant for a student

III. MEMBER'S- RESPONSIBILITIES

- A. Department member conducting a preliminary investigation in a Chicago Public School during a tour when school is in session
- A. In other than cases of emergency, proceed directly to the principal's office upon entry to a school.
- B. Identify the responsible officer of the school who is assigned to the officer's duty.
- C. Identify the members purpose for entering the school and request to interview and/or interrogate a named student.
- D. Advise the school principal or his/her designee a reasonable time; or if not possible, notify the parents or guardian of the student prior to beginning the interview or interrogation.
- E. Postpone the interview and/or interrogation of the student until the response by the parents or guardian to the school.
- F. Advise the school principal or his/her designee to be present in the school during the interview or interrogation of the student whenever the officer or his/her designee cannot be reached or they are unavailable to respond to the school.

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CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

3. Ensure that:

1. the responsible officer's supervisor has been notified, when practicable, whenever a student is being taken into custody. B-iers are reasonable grounds/practicable cause present for the officer to be placed into custody for a violation of the law or there is an outstanding arrest warrant for a student.
 3. a student who is taken into custody is provided with the Miranda Warnings prior to any questioning.
- H. Advise the school principal or his/her designee relative to the location to which the student is taken for processing to facilitate a subsequent notification by the school principal or his/her designee to the parents or guardian of the student.
- I. be responsible for notifying the parents or guardian of the arrested student of the location of the student and the location to which the student has been transported for processing.
- J. be aware of the professional responsibilities of school officers to provide the safety and well-being of all students and to therefore conduct their duties in such a manner as to ensure the safety of the students and the community.

LeSoy JAarUn Superintendent of Police

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IX. APPENDIX B: CPS STUDENT CODE OF CONDUCT

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Criminal Acts.

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X. APPENDIX C: CPD EMPLOYEE RESOURCE E05-01: PERFORMANCE EVALUATIONS FOR ALL SWORN DEPARTMENT MEMBERS BELOW THE RANK OF SUPERINTENEDNET

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- A. The Depiteent Is carrsrrtited 3d ensuring thi Evadors ot aE tui-erre employees are ccrellicfrd ana
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- D. Performance evafciatora wa -as conducted annuity and -«ia be completed upan an Afminlsradve Message Center (A9AC) Announcement toy (fre Dirictar, Bxrrsn Resources Division, 'jnse-ss Dtfcer*Ise estabSshed by this oErecjve.
- E. Tfte JTJA^ecrgf.. hViTra/i flgsourcca aVAstcm, w.g. ensun ffiui ing seffonn-aacc graVjf.toi- AVrcflatons are o'memftiaretf fo a,V
swsr.n Decurrmgnf cf-Btti >.n me f,rg OL'jfrer o/i»:g .near.
- F. Com-and personnel are jespons&Je Per the ad^nlstradan of peift-rmance evafuasens tor al sworn m-rrtcn under their supervision and will ensure that performance evaluations are administered fatrty and mat ail members are evaluated Impartially and under tne same standards settoy «sdrectt*e.
- G. TraKnff wis I be provided So aM supervisory members Sal *I8 te responsfcie rcr svalua£ng Department b;*-bera.

III. SWORN SUPERVISOR EVALUATIONS

- A. Performance evafeisfcccs for all sworn supervisors wR be documented cn Br* Performance EvaiuaSon -Sworn Supervisors term. Coirirand KalPunti commanding: officers -*IS erasure that
 - 1. Bre tap secSon cf the form ls completed. tar eacti sworn supervisor assigned la the una and fee Jarm ls dfctr&jted ta evaluating supervisors.
 - 2. all supervisors are evaluated ay S-* neat ttfgher-farAlng supervisor in their Immediate titan oi comn-and.
 - 3. a performance evaDjaticci form tar each sworn supervisor srye ran*, c£ semeanl or above Mill be corrected and:
 - a. the original tarm wil be sent to the Human Resources Cession and retained ■far tthe years.
 - b. a cop)' wil be placed l-> the rated supervisors Unit Watch Personnel =le.
 - c. a copy wil be given ta the rated supervisor.
 - dL the annual evaluation wil be entered Into the CLEAR Watch AppflicaScn by trw date i-jdicated by 1ft* Director, Human Resources Division..
 - i. arty swam supervisors wt» have been under a supervisor's oa-mantf tor a* less* thity days prior ta the announce mens of a» evaluation period are evaluated. Those who have AGrted for a commanding o3cer tor less fian thirty days wBI be evaluated by their prsvicusly assigned supervisor.
- H. When appScatoie, B-* CGiTISTiand stafPuntl commanding officers »I2 appoint tea sis of supervisor': to evaluate their subordinates. Eadt learn wEl operate under the direction a rVgher-ran>.&ig supeiviser.
- C. When applicable, lieutenants wn confer wKn other supervisor/ i-embers wta'n evetr unit -when evaluating* sergeants. The sarr* principle applies ta higher ranks.
- C-. .A supervisor above die wA ot the evakiited supervisor must sign the performance ev&ua&cn linn. The command staauns rommandtng officers wil ensure ShS the signaSJ-es cf sKpeivisDry members are agfcie and; h ink and that each supervisor has indicated his cr her rank and starteT;p:o-ee number, stgrsalure stamps wil cat ds used.
- E. Supervisors m1H be evaluated In S->elr ass%r.*d or deta:ea un& i? they were assigned lc that urJt Tar al least Wrly dar/3 or - are prtor b> die announcement c5 a?* evuaion period. IT not, they wil be eI*aiufted ay superviscn in the iasl unit af assignartentor detaS.
- F. A -sijpeivSsw *IS net be evaluated if he or she ha-: beer.;
 - 1. cn the medical rclifer an line::; ar r.;ur/, cn -ar pff duey, -far sir ccvsecubve mcn-tvs -ar more Immedatety preceding the *arr.ouncErrtERto-i-e eva-ua^cn perlsd.
 or a leave af atosence ^or slit or ran consecutt-ve months Immedately preceding the aor.ounsement cf £■» evuat-cn period.

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NOTE: "C-e top portcn cf Ferfor!7<ariCe Evaluation-Sworn Supervisors *11 te complsted, the appropriate bait rr.arked, and the fem forwarded la the Hyman Resource: DMskas along with 1fie offif evaluations.

IV. RESPONSIBILITIES IN EVALUATING SUPERVISORS

- A. The evatuaiair will checs the boi indicatng. the evafcjatos category for each e' the Ttve per*onr-anre dirrensJcns cn £-e evaiuaScn form.
- B. Each evaiuator must make comments (tn the comment secdan cf the Sorm) *or each category. Remarks will be percneri and as spectflic as possible.
- C. The evairator wil sign his or r»r rase and ^jdtate rank, star.employee number, ar.d the date In the space designated on the perfornance evaluation form.
- D- The evafcjafiens wil be reviewed; approved, and signed by Sis supervtsonexempt member In the evaluating supervisors Im- ediatecnaln oi corvTiand. The ssgr^jreofiaJ supervisors must be legible and Include rank and startempkyvee number.
- E. Easa evaiuator must evaluate his or her ssJMrtlnates under ine sara set c' 'air and hiparUal standards as set by this directive.
- F. In evaiuatSig stpervlsury personnel, the evafciator must not. onnr/ consider the supervisors performance, but aiso, when applicable, how wet the supervisor moSvates subcrddates to perform. Wflingness to bike Initiative, accep* icsponsibltty, and eicerbce disciplinc evul al be considered when assessing perfanriance.
- G. A supervisors evafejaScn shorid not flrctuate gneatiy from period to period without sufficient cause.
- H. The evaluate! rsusS consider recognSon received iby Sse nr,ember such as Honorable Mentions, Department Commendations, or other awards. Ukenlss, a suspension or any type of dlsciplnary accon or misconduct cfartna the evaluation period trust te addressed In the evaluation.
- I. WES) reference to "Dependab3£y, Attendance, and Promptness,' absences far medical reasons ii>u:£ be carefully evafcated before assignfcg an evaluattan. The reasons, duration, and number of meotal incidents are factors to be considered. A long-term absence due to fejury or lifcess shsuki .not be viewed Hie same as muifple absences of short duration. Members absent becapse or injury an dutj' ■«l3 not be penatzed.
- J. In units where several supervisors have supervised the same member, they may confer wsi each •other in evaluaBng the isefrVoer-
- K. The evaiutar wil deterr-Jne ire overal performsnce evaluation categor/ based on the evaluations receded for each of the live performance d£T*.nsSefls and n accordance w£-i the chart in Secton v> C of S-sa directive.

V. PERFORMANCE nJHEHSICHS. FOR SUPERVISORS

- A. In assigning ratfegs based upon tre ftve pomfrtance drr.ensiGns, evaluates wil consider various components under eacft dimension, depending upon the leb description of sse supervisor beita evaluated.
 1. Enfortmait of Work -Standards and itaft Development: Hold: r.emoers respcnst-lefcr Job performrvince, cc*-p> ranee with Department aaScy, and addressing problems apnmprater/.
 - a. Uses positive feedback and aosal setting io Improve meBit&er perferrianci.
 - b. Regular^ observes and reviews r.eiribcr performance.
 - c. Uses appropriate occurrences as Talnrg to Improve the- future Denatlc of s>±»ord:nates.
 - o. Administers prooesilve discipline -a her. necessary.
 - e. Rates supervisors on their abltty to train, evaluate, and i-onitcr re r suscrdrates, ? applicable.

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- f. Discusses new policies and procedures with members, including co-facilitator and facilitator, to ensure that members understand when, how, and why a policy or procedure should be implemented.
 - g. Provides positive feedback and; positive recognition gives credit where credit is due.
 - h. Demonstrates sufficient knowledge of subordinates' personal situations and potential problems that will affect work performance <<http://performance.com>>.
2. Analytical and Problem Solving: Is able to gather and analyze information from various sources related to a specific problem and is able to develop a plan to solve the problem based upon an objective analysis.
- a. Monitors conditions to identify and respond to emerging trends.
 - b. Allocates resources to an area before a problem escalates.
 - c. Develops contingency and fail-back plans.
 - d. Considers possible unintended consequences of a given course of action and thinks ahead to prevent long-term negative consequences.
 - e. Considers the impact of problems on other watches if often applicable and provides support to those other watches in addressing those problems.
 - f. When applicable, creates training processes for members on different watches to share information about crime patterns, emerging problems, and any other issues related to the beat.
 - g. Recognizes when decisions will set precedent or cause liability and takes these factors into consideration.
 - h. Can justify decisions.
3. Public Contact: Motivates members and acts as a role model in demonstrating a positive attitude in service to the public.
- a. Creates a vision or goal for moving the Department forward and successfully communicates it to members.
 - b. Listens well and considers other viewpoints before making a decision.
 - c. Knows well the supervisors, subordinates, and the public.
 - d. Negotiates conflicts fairly and effectively.
 - e. Leads by example and gets involved to help resolve problems and meet deadlines.
 - f. When applicable, reaches out and establishes relationships with community leaders to engage them in solving crime problems.
 - g. Adapts verbal and written language to the specific audience, whether Department members or the general public.
4. Delegation and Responsibility: Prioritizes and assigns tasks according to member's strengths and abilities.
- a. Identifies and builds on an individual's strengths.
 - b. Delegates tasks to develop member strengths, when appropriate.
 - c. Explains the bigger picture when delegating tasks.
 - d. Structures teams and delegates work to ensure the best use of time and resources -os-t effective outcomes <<http://outcomes.com>>.
 - e. Keeps up-to-date on changing circumstances and prepares members for new demand.

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- S. D*fp;ndaJ>lirt}\ AttaradanoB, and Promptne^G
- Demonstrates erceifcnce n perianal appearance, attendance,-and pro-p-toes:. b,, IVarSs •»e)l wish ilde ar no pjcvrtslon.
 - Can be reffed cn to cot-spie-e assigned cas£s; ftl'ows-up and ffcds sciubcms -when tasks become complicated.
 - Completes work Yi a tfceiy manrer.
 - Responds promptly to requests Tor review of Department pa^cy and proceti'jres.

VI EVALUATION CATB3QRIE4 FOR SUPERVISORS

- A. The TbYWtq flour performance eva'uaton categories are used to svaitiaa a supervisor's job performance for each of the five performance dimensions:
- Exoeedo Ezpoatabonc: Tfve member consistently displays performance of the duties and rcsponcibillbes of the Jab at a level that exceeds performance expectations for this dhiensjan.
 - Meets Expaptailone: The rrember rreets job performance expectations for mis dimension.
 - Requires improvement The member rust Improve JOO performance to meet expeetattons rcrhlis drnnasslon.
 - 4. UnaooeptaSila: The mere-i>e.rfaQs to neel job petfcrmance eapectoBans Tar &Ss dimension.
- B. A mombar's tsvwBi) portoimanco ovatv&tian category wtil be dOrivad tan tha evaluations raGg/vacf foraoctf of tfto tto*
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C. Performance evaluations for supervisors shall be determined as follows:

Caiaary Performance evaluation Categories

Exceed: Majority of individual dimension evaluations are "Exceed: Exceeded." No individual evaluations or "Unacceptable." - Eligible to be considered for specialized training. - Individual dimension evaluations are at least "Meets Expectations." No major individual dimension evaluations at "Unacceptable." - Eligible to be considered for special assignment. Majority of individual dimension evaluations are "Requires Improvement." No more than two of the five dimensions of the Captain EES review process. - Not eligible for specialized training. - Not eligible for promotion. Individual dimension evaluations of "Unacceptable." NOTE: For Captains: An OIA district law enforcement

VU. REVIEW OF SUPERVISOR EVALUATIONS

- A. The evaluator will provide performance feedback to supervisors receiving a performance evaluation at the conclusion of the rating period and will cover the following areas:
1. the results of the performance evaluation; and
 2. the level of performance expected;
 3. evaluation criteria or goals for the new reporting period; and
- career suggestions relative to such topics as advancement, special assignment, or training appropriate for the supervisor's position. The evaluating supervisor will facilitate a supervisor's career choices, career development, and achievement of career goals.

EG5-31, "Performance Evaluations of All Sworn Department Members as of September 23, 2017: H3 Review Rank of Supervisor."
C Chicago = Chicago Department, September 2017

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B. The PIP evaluator will prepare a To/From Supervisor Report to the supervisor's supervisor.

regarding the supervisor's rating for any of the five dimensions in the "Performance Evaluation" or "Unacceptable" category. If a supervisor is placed on a PIP, the supervisor at approved, the supervisor will prepare the PIP and submit it to his or her immediate supervisor who will ensure that the PIP is reviewed during the next performance evaluation and that a copy is placed in the supervisor's personnel file.

- C. Commanding officers will ensure that after the evaluator and approving supervisor have signed the performance evaluation form, the PIP is applicable to the supervisor's supervisor who will ensure that the supervisor and supervisor are notified of the PIP and request a review of the supervisor's supervisor.

NOTE: Commanding officers will ensure that any completed Performance Improvement Plan (PIP) - Supervisor are reviewed: quarterly and that the supervisor's supervisor are implemented.

- D. The evaluated supervisor will sign and date the performance evaluation form provided to the supervisor or she has reviewed the evaluation. A comment space is provided on the evaluation form for any comments the evaluated supervisor elects to include.

- E. If a supervisor refuses to sign and date the performance evaluation form, the evaluator will indicate this reason in the comments section by printing the words "Refused to Sign," followed by the supervisor's name and the date. All unsigned performance evaluation forms will be reviewed by the unit commanding officer, the district commander, or, when applicable, the next-level exempt supervisor's chain of command, who will:

1. interview the supervisor regarding the refusal and inform the supervisor of the appeal process, consistent with the relevant directive.
2. obtain the supervisor's signature and the date of the interview on the back of the performance evaluation form, should the

supervisor continue to jeSase to sign the perton-arce evaluation form.

- F. Once the evaluation has been approved and signed by the supervisor, the exempt member in the evaluated chain of command, the evaluator will sign and date the performance evaluation form attesting that he or she has reviewed the evaluation with the evaluated member.

YDI. APPEAL PROCESS FOR SUPERVISORS

- A. A supervisor may request a review of the performance evaluation within seven calendar days of the date the supervisor signed, or refused to sign, the performance evaluation form by submitting a Ta-Fram Subject report to the commanding officer or the unit assigned. If the commanding officer is the evaluator, the request will go to the next-level supervisor member in the chain of command.
1. The exempt (Temporary) officer will review all unsigned performance evaluation forms to determine if there is a need for review of member's report on his or her.
 2. If a performance evaluation form is unsigned and the supervisor has failed to request a review of the performance evaluation, the exempt member and the commanding officer will interview the member to ensure that the member has had every opportunity to avail him or herself of the appeal process.
- B. In response to a request for a review of an evaluation, the Department member hearing the review may interview or receive written reports from any individual deemed appropriate. The decision of the reviewing member will be final and will be documented in writing. A copy of the review report will be given to the member and another will be placed in the 'JNS' Watch Personnel File. The original will be sent to the Human Resources Division and retained for five years.
- C. If a performance evaluation is changed for any reason, regardless of the reason, it is ensured that a new performance evaluation form is prepared, signed, and dated by all parties. The new form is completed and submitted to the supervisor's chain of command. The original form will be retained.

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numbered "3 of 2," i.e. "VOID," and attached by post to the new form. Both forms will be sent to the Human Resources Division and will be retained for five years. One copy will be kept in the Unit Watch Personnel File and one given to the evaluated supervisor whose assignment was changed. The evaluated supervisor has the right to request a review of his or her changed evaluation.

PERFORMANCE EVALUATION SYSTEM (PE3) FOR MEMBERS BELOW THE RANK OF SERGEANT

- A. Members will be evaluated annually in the quarter prior to the quarter of the anniversary of their date of hire. The evaluations will be completed within 30 days of the conclusion of the evaluation period. The annual calendar quarters are as follows:

1st Quarter 2nd Quarter 3rd Quarter 4th Quarter

January, February, March-April, May, June July, August, September October, November, December

The following table clarifies when performance evaluations will be completed:

Quarter	Anniversary Date Month of the Member	Quarter in which Evaluated	Due Date of the Evaluation
1 st	January, February, March		30 January
2 nd	April, May, June	1 st	30 April
3 rd	July, August, September	2 nd	30 July
	October, November, December	3 rd	30 October

If the member's date of hire is:

1. 31 March, the member's performance evaluation will be completed in the 4th Quarter. The due date for the performance evaluation will be 20 January.
 2. 11 September, the member's performance evaluation will be completed in the 2nd Quarter. The due date for the performance evaluation will be 10 July.
- C. Supervisors will participate in training and receive a Performance Evaluation System Procedure Manual regarding the purpose, implementation, and use of the Performance Evaluation System.
- D. To effectively evaluate and document job performance of members under their command, supervisors will use the Performance Recognition System to record Early Intervention Activity Events, as defined in the Department directive entitled "Performance Recognition System."
- E. The Director, Human Resources Division, has overall authority over the PEG and will coordinate the training, management, and monitoring of the evaluation process Department-wide.

PERFORMANCE EVALUATION CRITERIA FOR MEMBERS BELOW THE RANK OF SERGEANT A. Members below the rank of sergeant will:

1. be evaluated by the supervisors of the unit the member was assigned to for at least the 30 calendar days immediately preceding the evaluation period.
2. not be evaluated if he or she has been:
 - a. on the medical roster for an illness or injury, on or off duty, for six consecutive months or more immediately preceding the evaluation period.
 - b. on a leave of absence for six consecutive months or more immediately preceding the evaluation period.

ECR-D I Performance Evaluation of A3 Sworn Department . . . the Current as of 11 September 2017: 1113 Its Rank of -S . . .
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3. be evaluated by supervisors who may consult with other supervisors if the member has worked with them. If the member has worked with more than one supervisor during the evaluation period.
- S. Performance Dimensions

There are five performance dimensions used in the evaluation of a member's job performance:

1. Accountability Dependability:
 - a. Takes responsibility for job performance in the assigned area and for decisions.
 - b. Works effectively with, minimal supervision and shows initiative by following through on assignments without prompting.
 - c. Adheres to work schedules and completes work assignments in a timely manner.
 2. Problem Solving / Decision Making:
 - a. Recognizes and diagnoses problems accurately, efficiently, and in a timely manner.
 - b. Identifies the need for a solution and adheres to it, using an open mind to evaluate the relevance and accuracy of the information.
 - c. Collects and organizes information and makes timely decisions using sound judgment to provide solutions to problems.
 3. Adaptability / Resilience:
 - a. Adapts rapidly and easily to changing demands and circumstances.
 - b. Maintains calm and displays restraint and perseverance when faced with unexpected obstacles, opposition, or hostility.
- Communication;
- a. Presents information in a well-organized manner, speaks and writes clearly, and understands the meaning of spoken and written information.
 - b. Makes a conscious effort to listen, analyze, and effectively respond to what others say and relates to others by demonstrating diplomacy and tact.
5. Job Knowledge / Professional Development:
 - a. Has knowledge of relevant laws, Department policies and procedures, and techniques related to job assignment and applies this knowledge when performing job assignments.
 - b. Seeks out learning opportunities and continually develops professional skills and knowledge.
 - c. Uses feedback from others to further develop knowledge and skills.
- C Evaluation Categories

There are four categories used to evaluate a member's job performance for each of the performance dimensions:

1. Exceeds Expectations: The member consistently displays performance of the duties and responsibilities of the job at a level that exceeds performance expectations for this dimension.
2. Meets Expectations: The member meets the performance expectations for this dimension.

3. Requires Improvement: The member will improve job performance to meet expectations for this dimension.
- i. Unacceptable: The member fails to meet job performance expectations for this dimension.

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D. Overall Performance evaluation Category

1. A member's overall performance evaluation category will be based on his evaluations received for each of the five performance dimensions.
2. Described below is a summary of criteria associated with a member's overall performance evaluation category.

p^SSiCategory;::	■ f\$ PeiflanceEya^ Cabegofes for members below rankfc£Jj ■V;:-"i--;sfis^&"-iC--sergeant ' . . .
Exceeds Expectations	Majority of Individual dimension evaluations are "Exceeds Expectations." No individual dimension evaluation is "Unacceptable" or "Requires Improvement" - Eligible for merit consideration and special assignments.
Meets Expectations	Majority of Individual dimension evaluations are at least "Meets Expectations." No more than one Individual dimension evaluation of "Unacceptable" or "Requires Improvement." A second year with an "Unacceptable" evaluation on the same dimension will place the member in the "Requires Improvement" evaluation category. - Eligible for merit consideration and special assignments.
Requires Improvement	Majority of Individual dimension evaluations are "Requires Improvement." No more than one individual dimension evaluation of "Unacceptable." - Three consecutive years of "Requires Improvement" Overall Performance Evaluations will place the member in the "Unacceptable" category and no salary increase will be given. - Not eligible for merit consideration, special assignments, or special employment.
Unacceptable	Three or more Individual dimension evaluations of "Unacceptable." - No salary increase, special employment, or writing secondary employment. - Two consecutive years of "Unacceptable" result in charges being filed to terminate employment.

XI. RESPONSIBILITIES UNDER THE PES SYSTEM

A. District Commanding Officers will

1. monitor the PES process to ensure that it is administered fairly and is conducted equitably by superiors under their command.

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2. review evaluations submitted by designated supervisors under their command and indicate concurrence or non-concurrence with the evaluation results. If the district unit commander disagrees with the evaluation:
 - a. concurs with a performance evaluation, the evaluation will be approved-
 - b. does not concur with a performance evaluation, the evaluation will be returned to the designated supervisor for segments

- supporting the evaluation and/or revisions necessary.
3. designate the appropriate unit supervisor to oversee the PE3 process for the following:
- B. Designated unit supervisors will:
1. advise the PES process for their watch.
 2. ensure that
 - a. ratings are entered into the PES and are forwarded to the designated unit commander for review.
 - b. any member transferred into the unit during the quarter of that rating; tier's performance evaluation period receives an evaluation that reflects the member's performance for the entire evaluation period and not only for the time spent in the new unit
 3. Identify which supervisors will provide each Department member's performance evaluation and the performance feedback during any quarter.
 - i. print the preliminary ratings to be reviewed and lead the performance evaluation review session.
- C. Reviewing supervisors will:
1. be notified of which members are to receive their yearly performance evaluation one month prior to the time the evaluations are due.
 2. independently consider the rating and performance of each designated sworn member under their command.
 3. review performance information contained in the member's personnel worksheet, the Performance Recognition System and contact the member's supervisors in previous units of assignments, if the member was assigned to another unit for a period of twenty-eight days or more during the evaluation period, to provide an accurate assessment of job performance.
 4. independently provide preliminary evaluations for members designated for their review and enter a preliminary rating for each dimension.
 5. participate in a performance evaluation review session, under the direction of the designated unit supervisor (unit commanding officer, i.e.):
 - a. review and discuss the:
 - i. the job performance of any member for whom there is a divergent rating on one or more dimensions.
 - ii. specific events that support the preliminary performance rating given for the dimension(s) in question.
 - b. Report their ratings with specific examples as to why they gave a particular rating for any member under discussion.
 - c. evaluate each affected member with the supervisor's goal of reaching a consensus on the appropriate rating for each divergent performance evaluation dimension.

EB5-31 Performance Evaluators of All Sworn Department Members; the Rank of Lieutenant
 * Chicago Police Department, September 22, 2017

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- D. Supervisors designated to provide members with their overall performance evaluation will:
1. provide the performance feedback to members regarding a performance evaluation.
 2. provide the performance feedback to members regarding a performance evaluation in the 'Performance Improvement' section of the 'Performance Evaluation' report.
- XM. REVIEW OF EVALUATIONS FOR MEMBERS BELOW THE RANK OF SERGEANT
- A. 2-star members:
1. Will have access to review their evaluations for each dimension and their overall performance evaluation.
 2. Will have job performance has been evaluated with a pass or reject the performance evaluation in the FES.
- B. The evaluator will provide the performance feedback to members receiving a performance evaluation at the conclusion of the rating period and will

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XI. APPENDIX D: LIST OF SCHOOLS SROs WERE ASSIGNED TO DURING THE 2017-2018 SCHOOL YEAR (OBTAINED FROM CPS)

SY 17 School List

ii: Police District	School Name	Address
001	Jones College Prep	700 S State St Chicago IL 606
; 001	Dunbar H.S.	3000 S King Dr Chicago IL 606
\ 002	Phillips	244 E Pershing Rd Chicago IL
[002	Martin Luther King	4445 S Drexel Brvd Chicago IL
002	Chicago Milit Acad	3519 S Giles Ave Chicago IL 6
r 002	DuSable Leadership Academy	4934 S Wabash Ave Chicago I
i 002 ,	Kenwood Academy	5015 S Blackstone Ave Chicag
002	Dyett H.S.	555 E. 51st Street Chicago IL 6

003	Hyde Park	6220 S Stony Island Ave Chicago IL 60619
004	Chicago Vocational	2100 E 87th St Chicago IL 60617
' 004	Bowen	2710 E 89th St Chicago IL 60617
: 004	Washington	3535 E 114th St Chicago IL 60617
005	Harlan	9652 S Michigan Ave Chicago IL 60619
005	Corliss	821 E 103rd St Chicago IL 60617
005	Carver Milit Acad	13100 S Doty Ave Chicago IL 60617
006	Hirsch Metro	7740 S Ingleside Ave Chicago IL 60619
006	Simeon	8147 S Vincennes Ave Chicago IL 60619
007	South Side Occup	7342 S Hoyne Ave Chicago IL 60619
007	Hope College Prep	5515 S Lowe Ave Chicago IL 60619
007	Robeson	6835 S Normal Blvd Chicago IL 60619
007	Englewood	845 W 69th St Chicago IL 60619
007	Harper	6520 S Wood St Chicago IL 60619
007	Lindblom	6130 S Wolcott Ave Chicago IL 60619
008	Curie	4959 S Archer Ave Chicago IL 60619
008	Goode	7651 S Homan Ave Chicago IL 60619
008	Gage Park	5630 S Rockwell St Chicago IL 60619
008	Hubbard	6200 S Hamlin Ave Chicago IL 60619
008	Bogan	3939 W 79th St Chicago IL 60619

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Police District	School Name	Address
r 008	Kennedy	6325 W 56th St Chicago IL 60638
008	Hancock	4034 W 56th St Chicago IL 60629
008	Solorio	5400 S St Louis Ave Chicago IL 60632
" 009	Kelly	4136 S California Ave Chicago IL 60632
" 009	Richards	5009 S Laflin St Chicago IL 60609
009	Tilden	4747 S Union Ave Chicago IL 60609
" 009	Air Force Academy	3630 S Wells St Chicago IL 60609
009	Back of the Yards	2111 W 47th St Chicago IL 60609
010	Farragut	2345 S Christiana Ave Chicago IL 60623
010	Collins	1313 S Sacramento Dr Chicago IL 60623
010	Little Village	2620 S Lawndale Ave Chicago IL 60623
11	Westinghouse	3223 W Franklin Blvd Chicago IL 60624
" 011	Manley	2935 W Polk St Chicago IL 60612
r 011	Marshall	3250 W Adams St Chicago IL 60624
' 011	Al Raby	3545 W Fulton Blvd Chicago IL 60624
" 011	Orr	730 N Pulaski Rd Chicago IL 60624
012	Clemente	1147 N Western Ave Chicago IL 60622
012	Whitney Young	211 S Laflin St Chicago IL 60607
012	Crane Tech	2245 W Jackson Blvd Chicago IL 60612

012	Juarez	2150 S Laflin St Chicago IL 60608
012	Wells	936 N Ashland Ave Chicago IL 60622
015	Douglass	543 N Waller Ave Chicago IL 60644
015	Austin H.S.	231 N Pine Ave Chicago IL 60644
015	Michelle Clark	5101 W Harrison St Chicago IL 60644
016	Taft	6530 W Bryn Mawr Ave Chicago IL 60631
016	Foreman	3235 N LeClaire Ave Chicago IL 60641
017	Von Steuben	5039 N Kimball Ave Chicago IL 60625
017	Roosevelt	3436 W Wilson Ave Chicago IL 60625
017	Carl Schurz	3601 M Milwaukee Ave Chicago IL 60641

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Police District	School Name	Address
017	North Side Prep	5501 N Kedzie Ave Chicago IL 60625
018	Lincoln Park	2001 N Orchard St Chicago IL 60614
018	Ogden	1250 W Erie St Chicago IL 60642
019	Lake View	4015 N Ashland Ave Chicago IL 60613
019	Lane Tech	2501 W Addison St Chicago IL 60618
U 019	Uplift	900 W Wilson Ave Chicago IL 60640
020	Amundsen	5110 N Damen Ave Chicago IL 60625
020	Mather	5835 N Lincoln Ave Chicago IL 60659
020	Senn	5900 N Glenwood Ave Chicago IL 60660
022	Morgan Park	1744 W Pryor Ave Chicago IL 60643
022	Percy Julian	10330 S Elizabeth St Chicago IL 60643
022	Christian Fenger	11220 S Wallace St Chicago IL 60628
% 024	Sullivan H.S.	6631 N Bosworth Ave Chicago IL 60626
025	Kelvyn Park	4343 W Wrightwood Ave Chicago IL 60639
025	Prosser	2148 N Long Ave Chicago IL 60639
025	Steinmetz	3030 N Mobile Ave Chicago IL 60634
025	North-Grand H.S.	4338 W Wabansia Ave Chicago IL 60639

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

XII. APPENDIX E: EXTENSION LETTER

Rahm Emanuel
Mayor

Department of Police • City of Chicago 312 S. Michigan Avenue • Chicago, Illinois 60653
Eddie T. Johnson Superintendent of Police

Joseph M. Ferguson Inspector
General Office of the Inspector
General 740 North Sedgwick, Suite
200 Chicago, IL 60654

July 27, 2018

Reference; Review of the Chicago Police Department's Management of School
Resource Officers Dear Inspector General Joseph M. Ferguson:

This correspondence serves as the Chicago Police Department (CPD)'s request for an extension of thirty (30) days in order to respond to the above-referenced report. Additional time is needed to confer with representatives of the Chicago Public Schools concerning the recommendations delineated in the report issued 18 July 2018. Should the CPD's extension request be granted, its response would be due 4 September 2018. (September 1st falls on the weekend and Labor Day is 3 September)

If you have any questions or concerns, please feel free to contact Deputy Director Tina Skahill of the Office of the General Counsel at (312) 745-6115.

Sincerely,

Eddie T. Johnson Superintendent
of Police

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

XIII. APPENDIX F: DEPARTMENT RESPONSE TO OIG

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Iosi'ph M. Ferguson
Inspector General
City of Chicago
Office of the Inspector General
740 North Sedgwick Street, Suite 200
Chicago, Illinois 60661

Dear Inspector General Ferguson:

This letter is in response to the City of Chicago Office of Inspector General's (OIG) report entitled, "Review of the City of Chicago's Management of School Resource Officers" (July 2018).

Maintaining the safety and security of our students, teachers, and other staff of Chicago Public Schools (CPS) is of the utmost importance to the Chicago Police Department ("CPD" or "Department"). CPD has demonstrated an ongoing commitment to those efforts by deploying various measures, including the deployment of police officers to schools to enhance safety and deter crime. It is in this regard that CPD expresses its appreciation to the OIG for providing their evaluation of the Department's School Resource Officer ("SRO") program. We thank you for your patience while we reviewed the report. We have taken your concerns seriously, and deeply value your recommendations.

As you know, CPD is presently engaged in the latter stage of the ongoing process that will lead to a consent decree with the Illinois Attorney General's Office, a serious undertaking that will align our operational practices with best practices and constitutional policing. To achieve this goal, the Department's consent decree will require CPD to reform its SRO program by formally adopting a comprehensive set of policies that reflect universal best practices for school resource officer programs. After reviewing the OIG's report, CPD is pleased to find that the review in our current policies by the draft consent decree relates to the SRO program will mirror the OIG's recommendations. We provide our new practices and specific responses to your recommendations in greater detail below.

Recommendation 1: CPD draft a policy and implement a Memorandum of Understanding, (MOU) with CPS and community stakeholders that establishes a comprehensive program, and that outlines the roles and responsibilities of CPD.

Department Response: The Department agrees with this recommendation. Pursuant to the draft consent decree, the Department will, before the 2019-2020 school year begins, undertake best efforts to enter into a MOU with CPS that clearly delineates the roles and responsibilities of CPD.

1. The draft MOU will include the following provisions: (a) CPD will provide training to CPS officers on the use of force and de-escalation techniques; (b) CPD will provide training to CPS officers on the use of firearms; (c) CPD will provide training to CPS officers on the use of chemical agents; (d) CPD will provide training to CPS officers on the use of less-lethal weapons; (e) CPD will provide training to CPS officers on the use of tactical equipment; (f) CPD will provide training to CPS officers on the use of communication equipment; (g) CPD will provide training to CPS officers on the use of emergency equipment; (h) CPD will provide training to CPS officers on the use of medical equipment; (i) CPD will provide training to CPS officers on the use of legal equipment; (j) CPD will provide training to CPS officers on the use of other equipment.

procedures lb? CPD alTivei itieraciipit with stadems while 0:1 school grounds, consistent with the law. bes* pfaciices, and 'hi.* Airrciincitl.

Rewnrtuieitidiiiiini M2: C'D should formally otUiiK she SRO's roles awl responsibilities, which shall eoiiCJiit an explicit pr^xihiiion of SRO* from inimeiring In rtHituw student disciplinary macteis.

Department Response: The DepunrncDt agree* vviiti this recommendation. Before ihe 2019-2021) •«hw.>l yenr begins-, in consultation vrth CPS, CPD will develops policy flat clearly defines lhe roles, responsibilities aind appropriate actions of SROs, and which will include an express prrohilirion on the adisiioUifalkin ofschool.il <http://ofschool.il> discipline by CPD otltcers. The policy will tc-flea be*' practices and will c-on-iain inc coliecti«iv, analysis, mi use ofdaia recording, CPD activities; in CPS schools.

Recpmnteodalion #3; CPD have formal SRO reeruiltrtent, election, and placement process and si4iniinn, is. Crease hiring guidelines tlat hem on nffiQcrs' qualifications fear working wliSi young people irs a school environment

Department Respond: Tin: Departniiejit concurs with this reeonitfiscndaion, lks consent dctfce will require lhai before ihe 201%2<20school year bcgiisa, in ctMUTittait'in with CPS. CPD will develop and implement screening criteria to ensure Dial ail offices assigned lo work in CPS schools lave the qitalications, skills, and abilities necessary tuwk safely and effectively wtihsutkntsi, parents, pii!rJi*rvs, and school perionnel. Only CPD officer* who satisfy lhe- sceocning criteria will & nssnjraed (o \\\>rk i.n CPS schools.

Rffxi>iiiiaieitdatitm H4: CMH should ctfuWiish policies requiring school.specific training for officers befoe they l>igir> wjrttng as -SRQS, as well as iegoist refresher tr;nnb.gs< 'Hicse trainings aliotild emphasis ahcmittives to arresting snidntftt as well as topics such as. constitutletal and civil rijjliis, childhood and adolescent dfivrfopmcni, ago-ajipropiale response lo i-ludeni conduct, diwbility and special education Blue.s conlliei resolution ond de-escalatosi techniques, restorative; justice, techniques, and inlciaitiiig with .specific sludent groups such as jhosc with iimiiai! English proficiency or who art lesbian., gay, hiscMial or (nftigesider.

Department Response; The DepartmejM concur* wiili this wtfommendation. As such, under the dr.sft consent dscree-. CPD has already CDitimiued to ensuring that ali officers assisted t« w«rk in CPS schools will receive speeiali/d initial iind annual refresher training iliat is \i<kqw[<:- in quality, quantity, scope asd type, and that atldresses sabjccls trccteduig, hut out limited u>; {3)school-based legal iopicji.(2>culiuTii| competency .{3} proMeni-solvingypl) de-est;ibiion,(5) use of restorative approaches, (fahsahility issues. fTichildhood and adolescent development, {&) crisis isiiie?i,eiiinn4, and {>>j methods i'nd tievttegics that create positive itrtenjetien* with specific student groups »«di as fee who aic IXiiJ'LQIA individuals^ a person ofcolor. have limited Kaglish fsKificiovey, or who are. experiencing hoiiclc^-.ies.'i.

AildijLoiKilly, xvYicn interne liny: with youih, CPD will uncoupijifi nijiecrs 10-exercise diicietiinn to use nlierntnives to arresi and ahefisatiu-5 io referral tojtiv«nite court sncliMling, but nolltoiiifed lo; issuing wvimings. arid providing u.cidimce; sefijeral lo community services and re^cmrccs <uch <ts menial lwahh.

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drug training, mentoring, and continuing education services and other activities; station assignment; and civil affairs.

Recruitment & CPD should implement a program to enhance racial and ethnic diversity.

Department Response: At the present time, the SRO performs functions under the Bureau of Patrol. The Department will give careful consideration to this recommendation for a program coordinator for the SRO program moving forward.

The new practices CPD will implement in place to meet the terms of the forthcoming consent decree track very close with the OICs recommendations. In fact, nearly all of the OJO's recommendations are incorporated into the terms of the draft consent decree.

The Chicago Police Department is certain that it will deliver on creating a strong SRO program rooted in partnership between CPD and CPS, that meets national best practice standards, and protects civil rights. Nonetheless, the Department welcomes the opportunity to discuss with you any of the recommendations that you do believe we have addressed by the draft consent decree.

Superintendent of Police

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MISSION

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City

government. OIG achieves this mission through,

- administrative and criminal investigations by its Investigations Section;
- performance audits of City programs and operations by its Audit and Program Review Section;
- inspections, evaluations and reviews of City police and police accountability programs, operations, and policies by its Public Safety Section; and
- compliance audit and monitoring of City hiring and employment activities by its Hiring Oversight Unit.

From these activities, OIG issues reports of findings and disciplinary and other recommendations to assure that City officials, employees, and vendors are held accountable for violations of laws and policies; to improve the efficiency, cost-effectiveness government operations and further to prevent, detect, identify, expose and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, -240, and -250.

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