



# Office of the City Clerk

City Hall  
121 N. LaSalle St.  
Room 107  
Chicago, IL 60602  
www.chicityclerk.com

## Legislation Text

File #: F2018-46, Version: 1

> ..:■ SEPTEMBER 2018 • ■

! " ~r,-;-;■:.. ..!\*"•'! -

# CITY OF CHICAGO ORilolc^ ^ ^ f

A I

## GENERAL

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

*hmMmm*

-a.

JOSEPH M FERGUSON INSPECTOR GENERAL

CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL 740 NORTH SEDGWICK STREET, SUITE 200 CHICAGO, ILLINOIS 60654 TELEPHONE:  
(773) 478-7799 FAX (773) 478-3949

## **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

WWW.CHICAGOINSPECTORGENERAL.ORG | OIG TIPLINE (866) 448-4754 | TTY (773) 478-2066

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:
  - the purpose of the SRO partnership;
  - outlines the roles and responsibilities of CPD, CPS, and principals in schools; and
  - 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.<sup>1</sup>

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;

<sup>1</sup> See Appendix F

WWWCHICAGOIMSPECIOGENERALORG | OIG TIPLINF {866} '✓i8-<V751 | TTY (773) /.78 ?06G

- 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

WWWCHICACOINSPECTORGENEPAI.ORG | OIG TIPLINE (866) 4 48-V/b-i | TTY (773) 478-2066

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,  
CPD  
Edward Siskel, Corporation Counsel, City of Chicago Law Department

WWW C HICAG OIN S PEC TORG E N IE HAL O PC | OIG TIPLINE (866) 1,1,8 'iVi/i | TTY (77.i) 478 2066

#### 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.<sup>2</sup> 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."<sup>3</sup> As a result, law enforcement officers assigned to work in public

<sup>1</sup> 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>

<sup>3</sup> *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-nosecurityv.pdf>

PAGE 1

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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."<sup>5</sup> 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.<sup>6</sup>

### 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).<sup>7</sup> 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.<sup>8</sup> 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 matters<sup>9</sup>;

<sup>5</sup> *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-nosecurityv.pdf>

<sup>7</sup> *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-nosecurityv.pdf>

<sup>6</sup> 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>

<sup>7</sup> 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>

<sup>8</sup> 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>

<sup>9</sup> 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>

PAGE 2

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

- involve collaboration with community stakeholders on hiring guidelines that focus on officers' qualifications for working with young people in a school environment<sup>10</sup>;
- establish policies for school-specific training for officers before they begin working as SROs and that they have regular refresher trainings<sup>11</sup>;
- continually evaluate SROs in a manner that incorporates feedback from school staff, school administrators, students, and families<sup>12</sup>; and
- develop performance measures to track SROs' effective use of alternatives to citations, tickets, and arrests.<sup>13</sup>

## 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.<sup>14</sup> 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 schools<sup>15</sup> 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).

<sup>10</sup> 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>. " 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>.

<sup>12</sup> 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>

<sup>13</sup> 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/chicago/police-public-schools-cpd-cps-misconduct-training/Content?oid=25347810>

<sup>15</sup> See Appendix D for the complete list of 7 A schools provided by CPS

PAGE 3

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

#### FIGURE 1: SCHOOL RESOURCE OFFICER PLACEMENT BY POLICE DISTRICT

0 000 8.000

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.<sup>16</sup> The Student Code of Conduct outlines what definitely constitutes criminal conduct and what may constitute criminal conduct.<sup>17</sup> It also includes a list of factors school staff and administrators should consider before involving CPD in any student matter.<sup>18</sup> 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://cps.edu/SiteCollectionDocuments/SCC\\_StudentCodeConduct\\_English.pdf](http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf) <sup>13</sup> 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_English.pdf)

PAGE 4

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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

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.



<sup>10</sup> Student Code of Conduct (Chicago Public Schools, September 5, 2017), 12, accessed July 13, 2018, [http://cps.edu/SiteCollectionDocuments/SCC\\_StudentCodeConduct\\_English.pdf](http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf); <sup>11</sup> Student Code of Conduct (Chicago Public Schools, September 5, 2017), 11, accessed July 13, 2018, [http://cps.edu/SiteCollectionDocuments/SCC\\_StudentCodeConduct\\_English.pdf](http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf)

PAGE 5

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

### **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.<sup>21</sup> 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."*<sup>22</sup>

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.<sup>23</sup> 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

<sup>21</sup> 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>

<sup>22</sup> 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](https://www.cpsboe.org/content/actions/2015_12/15-1216-PR8.pdf)

PAGE 6

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

SEPTEMBER 13, 2018

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.<sup>24</sup> 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.<sup>25</sup>

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.<sup>26</sup> A wide range of stakeholders including school staff, students, parents, families, community members, and youth development experts should then interview qualified candidates.<sup>27</sup>

• "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>

<sup>35</sup> 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>

<sup>20</sup> [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> <sup>27</sup> [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>

PAGE 7

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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.<sup>28</sup>

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).<sup>29</sup>

<sup>28</sup> [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>

<sup>29</sup> [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>

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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<sup>3,0</sup> 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.<sup>31</sup>

## **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.<sup>32</sup> 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;

<sup>30</sup> Student Code of Conduct (Chicago Public Schools, September 5, 2017), 2-5, accessed July 13, 2018, [http://cps.edu/SiteCollectionDocuments/SCC/StudentCodeConduct\\_Fi\\_Kilish.pdf](http://cps.edu/SiteCollectionDocuments/SCC/StudentCodeConduct_Fi_Kilish.pdf); Student Code of Conduct (Chicago Public Schools, September 5, 2017), 2-5, accessed July 13, 2018, [http://cps.edu/SiteCollectionDocuments/SCC/StudentCodeConduct\\_\\_Enalish.pdf](http://cps.edu/SiteCollectionDocuments/SCC/StudentCodeConduct__Enalish.pdf)

<sup>31</sup> 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/2017AwardDocs/chp/MQU\\_Faci\\_Sheet.pdf](https://cops.usdoj.gov/pcj/2017AwardDocs/chp/MQU_Faci_Sheet.pdf)

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

- 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.<sup>7,3</sup>

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).<sup>34</sup> This General Order only outlines the protocol for any Department member interviewing, interrogating, or taking students into custody on or around school property.<sup>35</sup> It provides no guidance specific to SROs or their responsibilities.<sup>36</sup> 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."<sup>37</sup> These evaluations should incorporate feedback from school staff, school administrators, students, and families.<sup>30</sup> DOJ and ED also recommend

<sup>33</sup> Memorandum of Understanding Fact Sheet (U S Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, [https://www.usdoj.gov/pdf/2017AwardDocs/chp/MOU\\_Fact\\_Sheet.pdf](https://www.usdoj.gov/pdf/2017AwardDocs/chp/MOU_Fact_Sheet.pdf)

City of Chicago, Chicago Police Department, "General Order G04-01-02<sup>1</sup> Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d6eab6458bcad279.pdf?hl=true>

<sup>35</sup> 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>

<sup>36</sup> 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>

<sup>37</sup> 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>

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>

### **CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW**

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

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).<sup>40</sup> This directive lists five

"performance dimensions" used to evaluate all Department members' performance:

- Accountability/Dependability<sup>41</sup>
- Problem Solving/Decision Making<sup>42</sup>
- Adaptability/Responsiveness<sup>43</sup>
- Communication<sup>44</sup>
- Job Knowledge/Professional Development<sup>45</sup>

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

<sup>35</sup> 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>

<sup>40</sup> 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>

<sup>41</sup> 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>

<sup>42</sup> 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>

<sup>43</sup> 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>

PAGE 11

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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.

PAGE 12

CPD MANAGEMENT Oh SCHOOL RESOUPCE OFFICERS REVIEW

#### **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<sup>41S</sup>. 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

<sup>41S</sup>An officer's posting specifically indicates an individual officer's duties

PAGE 13

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

sergeants/<sup>7</sup> 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

46.139 47.164. 46.836

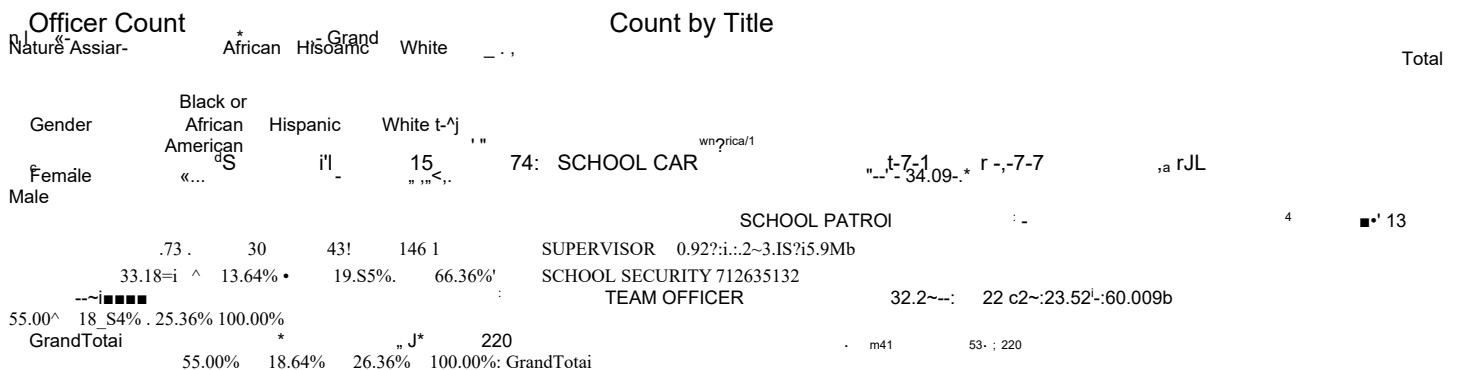
Current Age (bin)

"" 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

PAGE 14

CPD MANAGEMENT Oh" SCHOOL RESOURCE OFFICERS REVIEW

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/<sup>48</sup> 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-PR121.pdf](http://www.csr.cps.k12.il.us/purchasing/pdfs/contracts/2013_01/13-0123-PR121.pdf)

PAGE 15

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

## 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.<sup>49</sup> 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."<sup>50</sup> 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;<sup>51</sup>
- Collaborate with CPS, students, families, and community stakeholders to create hiring guidelines for SROs;<sup>5</sup>
- 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/aid/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/policies/secure-1/secure-1-implementation.pdf>

PAGE 16

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

## 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;

PAGE 17

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

- 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.

PAGE 18

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

\_ JL Chicago Police Department  
Gervel al Order GO4-01-02 pt~  
INVESTIGATIONS - CHICAGO  
PUBLIC SCHOOLS

IIIfI!3I3QD3BE]IIICIQD[GQQQOnOIBBafII  
IBIIISOQDQOOiQDQQQiJLTSliQBEdB

IIII

ISSUE DATE: 2S Septernoer S9=S | EFFECTIVE DATE | 29 S

MDEKATEOORYt FreCrrtnar/ hvesSgaflons

### I. PURPOSE

This d^scttve p-ovldK gu5de£nes lter Department fswrosrs CDntiucthg. a pr esrmnar/ orioi&w-up investigation In a Chicago FilWte School or sd)aceru Board of EducaScn property, eg., scfioal grounds, playgrounds, etc, dur\*g the time periods when the scfvoool ls Ji session.

### II. GENERAL INFORMATION

A. The Board cr Educaiton has a ipclcy of Tu3y cooperating wtfi ls\* enforcement persame! conducting frwesllgationis Wuin ichocls or adjacent Beard of Education properties during tours »'«le classes arc In session.

B. School effciais frdudng a: pmclaal or ris designee are responskle for

1. verlfyi"/g Uie cftclal SeJiCScallon -of a Department i-iemter assigned to cSSzen's dress duty who enters a school lbr Eie purpose of Ti:e.rv;ewr>g, .ratrogattog or arresting a student.
2. providing Cic parents or guardan with a prompt noeflcaSon whenever a Department rr^mbEr requests io interview, Interrogate cr lake Kd ejetody a student Si a Behcet.
3. siibstSjtto Tor the parents or guardian during Se TYlervle-a. or InfccrrcgaScn of a SuJde.nl <http://SuJde.nl> by a Department fsemter whenever the parents or guardtari ol tre studer\* cansot oe nestled or are unavaaisbie So respond to fte school.
- . notifying the parents or guardian of the s&jderrt concerning the res&fts o3 the interview or Interrogation of tne SvJdent.
5. releasing a student lo- lthe custody of a department me/Rper in all instances wSversever the responsible ir\*n-lber has reasenaKe grc'jr.ds ani'cr proba'oiie cause to arrest a student ?or a vbiaien 0 trie Saw or when tf-iere ls an outstanding arrest warrant for a student

### III. MEMBER'S- RESPONSIBILITIES

A. DeparSrrAnt member conducting a presmSnary anior fe-tonira inves-gation In a Chicago PuP3c School durttg a ttr,e iperiDd when scrool is h session

- A. ri other Shan cases cf emergency, proceed: a^rectty to the principal's effice upon entryto a school.
- B. Ideottjrj lumsss »the responsible seltcci ofScSi wtvejiever assigned to ttttseji's dress duty.
- C. desert\*, the members purpose tor entering tve school and request to interview anoVor Interrogate a named: student-si'.
- D. afew S-«e school princpal cr hfoher designee a reasonable hint; oT Ut\* » notify the parents or guardan oi the student prior o> beginning the interview or iriberrcgaicn.
- E. postpone the Interview ardtor In'erroBaHon of the r>i-ed stjden! lerppcararily P4r»lir<g a prcmp: response by ihe parents or guardian to \*\* schcot.
- F. osrrtt S» sehcoi prr^loal or h&lier designee to- 6e present In Svt rcfll»r< ir. Lie sCA3i during fcve r-,5erv^w ari'or Interrogation of Tie :bj.3>Tlt whenever the oarenii cr \*y^aralan car: nol be rotseo or they are 'jraolaoke io pro>~ptry respand to the :chocl.

GiK-'jS-CI Irr/ectgxors - Chicago PJ^c Zcttx& C -ZKcyy: =o3ce rjepartner\*; Sepajrioer 55=3

Curen: as cf C€ rto<erri«r 2317:14C\*5 ffs Page i of 2

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

<3. en sure "at:

1. the responsible supervisor has been notified, when practicable, wherever a student is being taken into custody. B-iers are reasonable grounds present for a student is being taken into custody for a violation of the law or there is an outstanding arrest warrant for a juvenile.
3. a student who is taken into custody is provided with the Miranda Warnings prior to any questioning.
- H. advise the school principal or higher designee in writing to the location to which (if a student arrestee) "arrested" for processing to facilitate a subsequent notification by the school principal or the designee to the parents or guardian or the student.
- I. be responsible for notifying the parents or guardian of the arrested student of the location at the police facility to which the student has been transported for processing.
- J. be aware of the professional responsibilities of school officials to provide the same safety and well-being of all students and to therefore conduct in a responsible manner as to the safety of the students and the school.

LeSoy JAarUn Superintendent of Police

S3-C74 RGE^mmdi

GD4-01-C2 In^e^B^s^s-CHca'goPJt-JcS^hccCs ■S Cttcagc ,=o3ce Oepar5ter>t. Sec'terr.ber

Caztctt. as of OS Ho'.w&er 2D 17:1 -105 rtz Page i- of :

PAGE 20

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

## IX. APPENDIX B: CPS STUDENT CODE OF CONDUCT

If approved by the CEO's designee, a student suspended for no more than three (3) days may be required to attend a District-sponsored re-entry program for a term of suspension.

### ■ POLICIFICATION GUIDANCE

School administrators contact the Chicago Police Department (CPD) in two situations: an emergency situation, or a situation involving law enforcement of a criminal act.

#### Emergency

School administrators have the responsibility to call 9-1-1 in situations that determine to be emergencies.

In an emergency situation, administrators must make reasonable efforts to return the student to the school as soon as possible.

#### Criminal Acts

When an incident occurs in a school activity, it may be necessary for staff to report the act to CPD. In such situations, school officials contact CPD to report the violation of the law. School officials must not call CPD to request removal of a student from the school in a situation;

in an emergency situation, administrators must make reasonable efforts to contact parents or guardians as soon as possible.

It is the policy of the Chicago Police Department to report criminal acts to CPD. The next section discusses the reporting of criminal acts. The next section discusses the reporting of criminal acts. The next section discusses the reporting of criminal acts. The next section discusses the reporting of criminal acts.

School officials must assess the situation and determine if it is necessary to contact CPD to report a criminal act.

- Whether the student distributed or was in possession of illegal drugs, narcotics, or other controlled substances, or if the student was involved in a criminal act. If so, CPD must be notified.
- Whether the student was in possession of a firearm or other dangerous weapon. If so, CPD must be notified.

Page 21 of 44

PAGE 21

- On\* sdiol staff rreTibars contact CPD. the rescinding prilce oficers •ultimately will detejrntne whether ar not ta LTOEstlgate, arrest, and/or taoa any other steps n response. 'School principals and stair" do mat nave ihe au&arry ia decide wheBie' astudentwiil bsarrastsd rVtenscuGr. responding police allccrs rJfo nei have ihe stitbcrlty to decide whether a. student win receive Interccrllonsor coasequauas al school'. Ihe sctex>l plncplal wilt use the SCC lo dalarminc-tha appropriate inUtrventfncf's) and/or consequencefs) to-address a students-behavior.

- ... 'Cortsjiderlafactors ar\*ove prior to riotijyifig CPD ; ■ Gambling (.3-2;
- *Forgery (3-7)*
  - False activation cr 3 lue alarm that dees not .cause a 'school iacility 1o  
ba ev3cu3ted cr do-as noi cause esrie^ency ^rvices 1r be ncstlt 'ad <A l.i ■ ■ b:lomrn (4-?)
- .; •.-A;saxiitv4-3}.
- Vandalism or criminal damage-kv-cfoparty-iihat costs, ieis <sup>TM~</sup>  
th3nSi-00C4,4>
  - Batten? 0: aiding or abatt ing in co-nrmissicn oi abattsry which doe's •  
not ,res\*^.: in 3physical ln|urv (4-5)
  - Ftghilng - more 1h«i two z&zpte ars/O' .rtvc-.vcu injury \*.|- C) ;:, ■•, 'hsft OTcossessjQnal stoten pTcparty tnai costs  
fsss thanii&Q >:.-4 7) '
- Possession. «ise, sale, ^distribution ol tirewo-cMrt-S) -:- t  
"nespassinjF.onCPSprosrly'^ll} . ■\*-. ■■,,;.-.-■-■
  - -.Used'mi imld2tlorvcr.sdbfs threats c: violence, coercion or persistent \*severe buitvirg!/(S, -1? ■■■■■
  - Inapprof^islf sexual conduct (S-?> v '•. \*- Sscarid cr.fiepeat&ividl'alf m ol Behavior 4-l4..u\*s or possession of  
.-alechohn school 'c at aschMi rc-l, 'r>!:;o (unction or bclors schorl ay .  
beterea schoc^related'Juricfisn (5~iS) ■■ •

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

## Violations or Criminal Law

- \*Ca<sup>++</sup>1ai^Ki^b^ prtAr Cd mtlJyfrig GM>
- Knowingly-or intenttenu !ly using lha CPS neiwo^< or inloHnaiirn iechnDfc-gy devices to spread viruses io tha CPS network (4~l2.)
- .Aggravated assaiiit <5 • l;i
- .Burgja"v
- fhfsi oreccssc-sslonc4 stolen property mat ocsts rmore.lhanSii.3 <5-3;
- Gang activity or overt displays of gang a'hliiat'tei (5-6)
- .. E.nqaiBting in anyoother liieial ke^avIprwitlcti.Int'ey^6res--v.'l'th.tha schoc-J's



- educational process, including attempt (s-8)
- Persistent of severe acts of sexual harassment (i '9>
- False activation of a 1 '2 alarm which causes- a school facility to be evacuated or raises emergency services to the school (s-10)
- Battery, or attempt or abetting in the commission of a battery, which, results in a physical injury, (s-12)
- Use of any computer; Inciting or soliciting another person to use any information technology device to threaten, stalk, harass, bully or otherwise intimidate others, or hacking into the CPS network to access student records or other information. To do so in order to otherwise, knowingly, in the future, for security system (s-15-M)
- Vandalism or criminal damage to property that causes or results in damage to personal property of a school employee (s-15)
- Use or possession of illegal drugs, narcotics, controlled substances, or other substances, or possession of such substances, or possession of or use of any controlled substance
- Intentionally or recklessly causing or attempting to cause a school employee to become incapacitated (s-17)
- Participating in a mob activity (s-19)
- Use, possession, or concealment of a dangerous weapon or device or use of any other object to inflict bodily harm (s-20)
- Intentionally causing or attempting to cause a school employee to become incapacitated (s-21)
- Arson
- Bomb threat. (s-22)
- Sale, distribution, or intent to sell or distribute alcohol, illegal drugs, narcotics, controlled substances, or other substances, or any other substance used for the purpose of intoxication, or second or related violation of Behavior (s-23)
- Sax acts which include the use of force (s-24)
- Aggravated battery, or aiding and abetting in the commission of a aggravated battery (C 3)
- Attempted murder (s-25)
- Alleged murder (C 3)
- Kidnapping (s-26)
- Heist or possession of stolen property that costs more than \$1,000 (s-27)

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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

A Chicago Police Department  
Employee Resource E05-01 IEg  
PERFORMANCE EVALUATIONS  
OF ALL SWORN DEPARTMENT  
MEMBERS™ BELOW THE  
RANK OF SUPERINTENDENT  
03 a a i s o s i i a a a  
s b b e s i t s j t

IS WE DATE:

11S£EtaTfc-r2017

| EFFECTIVE DATE: | 11

REICSHDS:

EC5-J1 VeSon 01  
rtrjx/3Q12

2CCS; B3S-01-01 VeSon 21 Febr

INDEX CATEGORY:

Caw Qcv«t:pr-ert

PURPOSE

TrfcsKEcUra:

A. contiiES annual pettarancg evaluations la sworn msrrtes below ife ran of servant using tfe efecScrtc P&formaoe Evaluation System (PESjk & ireroducesthe;

1. arrasl peffanance eratoatlDns for all sivr supervteors Mow the ran\* of SuperirtenirenL
2. PHtarmance tvSuito-@awn Super.lscrs &m fpPD-6^i57L  
I Petfarrance trnprtremefn Plan, (PtP)-@jifDm Supentears rccm (CPI>5Z353;l
- C. dteccnfrsiestrieusecf fte:
  1. r^orr^i(HR2ilng<^(CPO-6Z3E9ji
  2. PerJcm'.anreEvaUj&nS^iEm^
- D. s3i£ne£CAL&i^,vQTarrerTKnts-3«S3.†3rQf crap\*5f35.

#### POUCY

- A. The Depiteent Is carrsrrited 3d ensuring thi Evadors ot aE tui-erre employees are ccrellicfrd ana ctocurnersd amuatly. Ttie purposes of perttfmsroe eraftstlens are Id:
1. siandartfze lre nature of lhe persanre. o^sBrHnafchg process;
  2. assure me puttie 3iat tefalment pesainat are qualified to earn' out their assigned dUies;
  3. prutfde memfcers ^lh -he necessary Womutfcin so asSst fiern in mairtlrSng sp&roplate Cetuvos;
  4. etMnate iraaxopiias fc£h3«c8s; are)
  5. oorpy iKSh Murtc&a Code cf Chteags MCC 2-Si-i3C, wnieii requises the Crt'csgo Polls Deparrriern io rate m sex>m martes†
- B. 7?ie asjesstrem of a ne.Tte"j los o?frtxv)s.-ce k sr, cfigarjg excess an! vie smual ayfoTrense sraieien fo not && ortV arc j&tng tne yes/ mat samftas atarcf fiaags ogt&T^Jice i55i»°s

c. Gnqatq coasift? atf fefii5ac)t iCroi-.ijej s^rvrjars w?i ooacrTliirS£s rreugtotiT Lte ',~a-ro:

1. igftCLS msinaarf eriat; 5 aifana refoTTaree flaneur reattach allows mansea's a ji.IKt n'Air ate/ire; to perttMnanse TOreygrrevi: nesfti sfij is ,w.?rae4 a asasr men .Vi

cgrrwH.-nrfaTe                      signfflca\* creasm; fa? sy^r a\*;!? g avMe aMce aro  
cores rase IVoo.^c.                      aft'a                      ne-TOere                      my                      sua&rce                      a

ECS-CI .sefonrx.es <http://sefonrx.es> £valu»K: 3\* -V Swarr Coxment Mancer: 6e«f 3is      Oxwt a:- cf 11 Sewfrax      M 12 hi  
RarkolSir^r.nawen!                      PACE 24  
« Cv:aso rules Ce»xii»ail, Septsrccr 2) l?                      Psge ' cf 15

#### CPD MANAGEMENT Oh SCHOOL RESOURCE OFFICERS REVIEW

- 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\*lse 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 Decurrmqnf cf-Btti >.n me f,rq 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 peformance evaluations are administered fatrty and mat ail members are evaluated Impartially and under the same standards settoy «sdtrectt\*e.
- G. TraKnff wis l be provided So aM supervisory members Sal \*l8 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 ttfgheer-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 form will be sent to the Human Resources Section and retained for five years.
  - b. a copy will be placed in the rated supervisor's Unit Watch Personnel file.
  - c. a copy will be given to the rated supervisor.
  - d. the annual evaluation will be entered into the CLEAR Watch Application by the date indicated by the Director, Human Resources Division.
- i. If any sworn supervisors who have been under a supervisor's management for a less than thirty days prior to the announcement of an evaluation period are evaluated. Those who have been assigned for a commanding officer for less than thirty days will be evaluated by their previously assigned supervisor.
- H. When appropriate, the commanding officers will appoint a supervisor to evaluate their subordinates. Each will operate under the direction of the supervisor.
- C. When applicable, lieutenants will confer with other supervisor/ members within the unit when evaluating sergeants. The same principle applies to higher ranks.
- C-. A supervisor above the evaluated supervisor must sign the performance evaluation. The commanding officers will ensure that the signatures of the supervisor and the supervisor are given and that each supervisor has indicated his or her rank and state employee number, signatures stamps will be used.
- E. Supervisors must be evaluated in the assessment or detail if they were assigned to that unit for at least thirty days or - are prior to the announcement of an evaluation period. If not, they will be evaluated by the supervisor in the unit assigned to detail.
- F. A supervisor will not be evaluated if he or she has been:
1. on the medical leave line; or
  - on a paid leave, or on a leave of absence or on a consecutive months immediately preceding the announcement of an evaluation period.
  - or a leave of absence or on a consecutive months immediately preceding the announcement of an evaluation period.

EE5-D1, "erTDrnaf":E E Jitons of .Al \$/Kim Department interviewers set the -CuTem as of 1 • Seaenaer 2317:1113 iris Rand  
cfSiissrrjrjencfeE  
4 -Srii/agf; Po3 cs De pan-Ter. % J« ienroer 2D 17

?->3e i -zf' ~i

PAGE 25

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

NOTE: "The top portion of the Evaluation-Sworn Supervisors will be completed, the appropriate bait marked, and the form forwarded to the Human Resource: DMskas along with the off evaluations.

#### IV. RESPONSIBILITIES IN EVALUATING SUPERVISORS

- A. The evaluator will check the box indicating the evaluation category for each of the five performance dimensions on the evaluation form.
- B. Each evaluator must make comments in the comment section of the form for each category. Remarks will be pertinent and as specific as possible.
- C. The evaluator will sign his or her name and indicate rank, state employee number, and the date in the space designated on the performance evaluation form.
- D- The evaluations will be reviewed; approved, and signed by the supervisor or exempt member in the evaluating supervisors immediate chain of command. The signatures of supervisors must be legible and include rank and state employee number.
- E. Each evaluator must evaluate his or her subordinates under the same set of fair and impartial standards as set by this directive.
- F. In evaluating personnel, the evaluator must not only consider the supervisors performance, but also, when applicable, how well the supervisor motivates subordinates to perform. Willingness to take Initiative, accept responsibility, and encourage discipline will also be considered when assessing performance.
- G. A supervisors evaluation should not fluctuate greatly from period to period without sufficient cause.
- H. The evaluator should consider recognition received by the member such as Honorable Mentions, Department Commendations, or other awards. Unless, a suspension or any type of disciplinary action or misconduct during the evaluation period trust

addressed in the evaluation.

- I. WES) reference to "Dependability, Attendance, and Promptness," absences for medical reasons must be carefully evaluated before assigning an evaluation. The reasons, duration, and number of medical incidents are factors to be considered. A long-term absence due to injury or illness should not be viewed the same as multiple absences of short duration. Members absent because of injury or duty must not be penalized.

J. In units where several supervisors have supervised the same member, they may confer with each other in evaluating the member.

K. The evaluator will determine the overall performance evaluation category based on the evaluations received for each of the live performance dimensions and in accordance with the chart in Section V of the S-SS directive.

#### V. PERFORMANCE STANDARDS FOR SUPERVISORS

A. In assigning ratings based upon the five performance dimensions, evaluators will consider various components under each dimension, depending upon the job description of the supervisor being evaluated.

1. Enforcement of Work Standards and Staff Development: Hold: members responsible for job performance, consistent with Department policy, and addressing problems appropriately.
  - a. Uses positive feedback and goal setting to improve member performance.
  - b. Regularly observes and reviews member performance.
  - c. Uses appropriate occurrences as training to improve the future performance of subordinates.
  - d. Administers progressive discipline when necessary.
  - e. Rates supervisors on their ability to train, evaluate, and monitor their subordinates, if applicable.

EE5-31 refers to evaluators of A3 and A4 from Department. Supervisors below the Rank of Superintendent:  
C ChJogoroace Zepamtr-, Sec-temper 2317

Continuation of II SeasmDer 2317:111S nZFaije jof S3

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

- f. Discusses new policies and procedures with members, including co-supervisors and field supervisors, to ensure that members understand when, how, and why a policy or procedure should be implemented.
  - g. Provides prompt feedback and; positive recognition gives credit where credit is due.
  - h. Demonstrates sufficient knowledge of subordinates' personal and professional problems that will affect work performance. <http://perTamar.ee>
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 closely 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 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: Leads 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.
- h. Delegating or reassigning 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 - so that effective outcomes are achieved.
  - e. Keeps up-to-date on changing circumstances and prepares members for new demand.

ECE-D t .-erformaKe ^valuatons of A3 Sworn Department .Verbers peiow the Current -as of 15 Sestemser 2117:11 "3 firs Rank of -  
Superlrrfirident  
£ Chiicsgc Poles :Depan:-erit, Seoamoer 2317

Page \* of 3

PAGE 27

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

- S. Demonstrates professional appearance, attendance, and professionalism.
- a. Demonstrates professional appearance, attendance, and professionalism.
  - b. (Varies with the job)
  - c. Can be relied on to complete assigned tasks; follows-up and follows through when tasks become complicated.
  - d. Completes work in a timely manner.
  - e. Responds promptly to requests for review of Department policy and procedures.

#### VI EVALUATION CATEGORY FOR SUPERVISORS

- A. The following performance evaluation categories are used to evaluate a supervisor's job performance for each of the five 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 job performance expectations for this dimension.
  - 3. Requires improvement: The member must improve job performance to meet expectations for this dimension.
  - 4. Unsatisfactory: The member fails to meet job performance expectations for this dimension.
- B. A member's supervisor's performance category will be determined by the evaluations received for each of the five dimensions.

parfanrrsnco dunwiatona.

EC5-31 Fe-farrnnce svasjatons of .Al S-«om Departmen; Mercers aeizw the Rank of SucefWendent  
4 ChJcagc Polce Oeparc-er,- Seoarroer2D17

Cuienl as cf 15 ScpoemDer 2017:1l "3 rtz Page s -of 33

PAGE 28

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

C Performance evaluations for supervisors <slle determined as follows:

Caiaacary Performance evaluation Categories

Exooadc ExMajority of individual dimension evaluadans are "Exceed: Expsciat'ons." No Indh/idua  
evaluations cr "Unacceptable." - - EEgible to te considered far speciaJzed training. - /i  
Itaete ExpeMajority of individual dimension evaluations are at least'Meets EipecSaScos." No mzt  
Individual dimension evafcuOcna at "Unacceptable." - EBgMe to te considered for spæ  
RequireMajority of individual dlrensScn evaluadans are "Requires teprovementl" No rrjore than tsc  
the hlttaBan cf the Captain EES rcerciovol process. - Not eligible for specialized hairing. - N  
UnaTersest mane ^dividual dimension evaluations of "Unacceptable." NOTE; ?or Captains: An Ov  
district la\* enforcement

#### VU. REVIEW OF SUPERVISOR EVALUATIONS

- A. The evaiuator \*tl provide .tod performance feedback to supervisors receiving a perfar-ance evaluation at the conclusion of the rating period and wit cover Die following areas;
1. tise resus of the performance evaiuaicn Just rcoatete:!;
  2. t-< level of performance expected:
  3. evaluation criteria cr goals for the new reporting period; and

- career suggestions relative to such topics as advancement, special assignments, or training appropriate for the meritorious position. The evaluating supervisor will facilitate a review of career choices, development of career goals, and achievement of career goals and well-formulated entices.

EG5-31 „ertonn»LS Evaluat-ons of .Ai Sworn Department .Vfe-ters aetawtne Current as cf n Sepfterroer 2317:1 H3 rvs Rank of  
Supertttenderr.  
C Chicago =cdce Qepari-ent, Beptemoer 2D17

Page : ? 13

PAGE 29

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

B. TPIB evaluator will prepare- a To/From Stibjaol Report to hit or her frnmedtata cupervlccr  
reguectlnB 4fia1 a Pprft<TTiar>pt imarovertrgriit Plan >IPIFI-awem supgrYlsore iQR&t.2\$£Lat  
nraaoed for any merr4)gr who raqirrie a rating for any raiTonnanga dimensions in the -Pnolrecr lmDrnven>ir.1" or  
"UnaoobncaMe" oateoorv. If a Perpftmanc? HmprovaimBnt Plan |PIP>-3 warn Supervisor at approved, tha av&luator will  
prepare lne PIP and submit ri to his or har lmmadlata supervisor who will ens-ure that the PIP te ravelvad during tha snext  
performanac evaluation and tha i oopy k ptoeed in tea rated tuost-vlc-ofc UnsM Watoh Perennnal Ella.

C. Commanding officers\*15 ensure that after the evaluator and approving supervisor have signed the performance evaluation form, and the PIP is applicable, the evaluator discusses the evaluation with the evaluated; supervisor and informs him or her of the right to request a review of the evaluation.

NOTE; Command slafPunr! commanding oncer wJl ensure Sial any completed Performance Improvement Plan iPIP) - Ssram Supervisor are reviewed: quarerty and that the irecomiTendatons for Imprcieirents are Implemented!

D. The evaluated supervisor will sign and date the performance evaluation form provided to the employee. The supervisor 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 evaluator'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 in the supervisor's chain of command, who will:

1. interview the supervisor regarding the refusal and Inform tiSn or her of tne appeal process, consistent wssi item vill ot ens directive.
2. a»t hfe or her signature and the date of the interview on the bacti of the perronance evaluation rcrm, should the supervisor continue to leSase 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 acknowledging 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-Form Subject report to the Ta-Handling Officer or the unit assigned. If the commanding officer is the evaluator, the request will go to the next-level supervisor in the chain of command.

1. The exempt (Temperas ccrrri-andrig officer will revlsw al unsigned performance evaluation terms 1a determine if ftere ls a recfdesS tor review imember's report^ on Sis.
2. IS a performance eva.Ua'ien form IS unsigned and toe supervisor has faled so request a review of the performance evaluation, She exempt metrJjeirtrJt ccm~andi-g officer iatli interview the meraber to ensure rat tne member fas had ever/ opportunity to avail him or herse!! of the appea' process.

B. In response to a request for a re-evaluation of an evaluation, the Department member hearing the review may interview or re-interview the member and review all 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 member's report will be given to the member and another will be placed in the member's personnel file. The original will be sent to the Human Resources Division and retained for five years.

C. If a performance evaluation is charged for any reason, re .-.emoer }»arming the aapeai \*15 ensure that a new perfor7r>5nce evaluation frm is prepared, signed, and dated by al panes. The ne'A fpr-a!S te completed and nu-cereo '2 cf 2" tn the upoer dght-Transd comer. The cnglnal fonri All te

ErJ:-D1 ;=e^tjrrar>s =s-a#uatorc of Ai 3A\*om Djpartment itertsrs Pei?\* toe ^unem as of 1 \*i Sesterrier 2317:11 \*s3 "vs  
Rand. cf-Supertjeodem  
\* Chicago-i=oJce Ceparttrr', Sep&mter 2D17

i=-ije cr '3

PAGE 30

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

numbered \*3 of 2," i-arkeo 'VOID," and attached by p-aor ci'p te the new form. BoBi forrris will te sec\*; ia toe Human Resources Division and wfi be retained for f,ve years. One copy wSI be kept si the Unit Watch Fersonnel fie and one given ta the evaluated supervisor wnose avateiaSan was changed. The evaiuated supervscr has fee nght to request a review of his cr her changed evaiuatfcn.

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

A. Members wia be evasuated annually tn Bis quarter prior ta the quarter of the anniversary of sver date of hire. The evafciaciens win be completed within Silly days of the conclusion of Die ovaJuaBon pettod. The annual calendar quarters are as foil-jss:

1<sup>st</sup> ffiuarter 2pi Grjarter y\* Quarter Quarter

January, February, Marti-April, May, June July, August, September October, Naveir.ber, December

The following marrbr clarifies when perfanr^nce evaluations \*il be com Dieted-

Quarter	Annfven-iry Date Month of the Member	TJib Quarter ihiB Merrtbor Will Be Evaluated	Due Data olthe Evaluation
1*	January, February, March		30 January
2 <sup>nd</sup>	Apri, May, June	1*	30 .Apr3
3*	July, A'gust, September	2*	3D Jury
	October, November, December	3*	3D October

Ifthe messfcers date cf h&e ls:

1. 31 March, She nrvembers oerformance evafctaSon will be completed! In tre 4th Quarter. Tne due date for the perrormarjce evaiuaBon will te 2 0 January.
2. 11 3ep5e>tV0er, the rreKTiders perfdmancs evaluation will be completed tn the 2<sup>nd</sup> Quarter. The due date -far Bsc performance evaluation wll be 10 Jiry.

- C. Supervisors wil participate n Srahirsg and receive a Ferfornsance Evaluation Syste>-< Procedure Manual regarding the purpose, Implementation, and use of the Performance Evaluation System.
- D. To eiTecbveiy evaluate and document Job performance of merbers under their command, supervisors wSI use toe FerEarr^ance Recognition System Oo record Early Intervention Activity Events, asdefneated it the Department directive entllEed'Perforr^teRetoanSor! System."
- E. The Director, Human Resources Division, has overall authority overtre PEG and wil coordinate trie 5T;plei7ientar>jn, managerent, and rrAniorftg of toe evaiuaBon process Depariment-silde.

### PERFORMANCE EVALUATION CRITERIA FOR MEMBERS BELOW THE RANK OF SERGEANT A. Members below the ran\*, of sergeant wil:

1. te evaiuated by toe supervisors! of toe unit die rrvDer was assigned I detailed to for at least tre to&ry calendar days Immediately preceding ire announce/rent o? the evaluation period.
2. not be evaluated \*bo have been:
  - a. an the medical roil for an Uness or injury, on or off duty, for stir consecutive months or mere ii-redate\*/ preceding tne arincuncerrertofth: evaluation period.
  - t. on a leave o\* aacence far sir consecutive menrts cr mere immediately preceding the anncurcemer t of the evaluation period.

ECr-D I Ferlormancs Eva\*u3tonc of A3 Sworn Department .'.te-ber: ceiw the Current as of 11 Seotemcer 2317:1113 lts Ran\* cf -S jcenrtenden:  
€ ChJcagc-Folce DeparraerK, Seostmoer 2317 .:=age \*: cr" O

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

3. te evaluated by superilsorvs) wha may consult with ctirer supervisors re member has worked «ah If the member has



merited for more than one supervisor in 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 and actions...
    - b. Works effectively with, minimal supervision and shows initiative by following through on assignments without prodding.
    - 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 what is needed 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 valid and timely decisions using sound judgment to provide alternative 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 true meaning or spoken and written instructions.
    - 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 job performance expectations for this dimension.
3. Requires Improvement: The member works to improve job performance to meet expectations for this dimension.
4. Unacceptable: The member fails to meet job performance expectations for this dimension.

EE5-D1, "Enrollment": Eva Suato of AS Sworn Department. Attends below the Council as of the Session 23/7/1113. Its Rank of 3rd tier.  
«Create»; «JceOeparrTent, SepiemE\*2D17

Page-j of "i3

PAGE 32

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

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.

Exceeds Expectations	Majority of Individual dimension evaluations are "Exceeds Expectations." No individual dimension evaluation of "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 increases, special assignments, special employment, or writing secondary employment. - The member's performance evaluation will result in charges being filed for performance of duty.

#### 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.

EE5-31 re-fairness of the Swam Department's review of the 11 September 2017: 1153 in the rank of the Siterrience  
; Chicago = 01: 10: 00; September 2017

Page m a\*-13

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

2. review evaluations submitted by designated supervisors under their command and indicate concurrence or non-concurrence with the evaluation. If the district unit commander concurs:
    - 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 as necessary.
  3. designate the appropriate unit supervisor to oversee the PES process for the unit.
- B. Designated unit supervisors will:
1. oversee the PES process for their unit.
  2. ensure that
    - a. ratings are entered into the PES and are forwarded to the district unit commander for review.
    - b. any member transferred into the unit during the quarter of that member'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 preliminary ratings to be reviewed and lead the performance evaluation review session.
- C. Review supervisors will:
1. be notified of which members are to receive their yearly performance evaluation one month prior to the review.

- evaluations are due.
2. independently consider the performance of each sworn member under their command.
  3. review performance information contained in the member's personnel file with 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, if available):
    - 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 they gave 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 = October 1, September 22, 2017

Revised as of 11 September 2017: 1113 is Page 1 of 13

#### CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

D. Supervisors designated to provide members with their overall performance evaluation will:

1. provide the member with performance feedback to members regarding a performance evaluation.
2. provide the member with performance feedback to members regarding a performance evaluation in the following areas:

#### XM. REVIEW OF EVALUATIONS FOR MEMBERS BELOW THE RANK OF SERGEANT

##### A. New 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 respect to or reject the performance evaluation in the FES.

##### B. The evaluator will provide feedback to members receiving a performance evaluation at the conclusion of the rating period and will cover the following areas:

1. Evaluate the member's performance evaluation on just completed;
2. The level of performance expected;
3. Evaluation criteria or goals for the new reporting period; and

■, career suggestions relate to such topics as advancement, specialization, or training appropriate for the employee's position. The evaluating supervisor will facilitate the member's career choices, career planning of career goals, and achievement of career goals through meaningful and well-formed choices.

##### C. If a member does not accept a rating for an individual dimension or the overall performance evaluation, the supervisor will document the member's reasons for the evaluation in the FES.

##### D. The designated unit supervisor or commanding officer will:

1. review all rejected performance evaluations;
2. Interview the member regarding his or her rejection of the evaluation and verbally inform the member of the appeal process that may be exercised within seven calendar days of the interview and

3. document Bre interview In the FB3 and indicate whether the member continued to reject the evaluation.

XDI. APPEAL PROCESS FOR MEMBER BELOW THE RANK OF SERGEANT A. Primary

1. 3wom CepartT.ent members rriay:
  - a. appeal tf\*ir overai peiforance evaiuaBon and Bieir performance dteensicn assessments.
  - b. .request a revle\* oi tfetr performance evaluation by Bie district < urit command tig officer. The mec^e,wis document the reasons for rejection of ire evaiuaBon within the PES within seven calendar days of Uie date the me- ter reviewed and refused to accept the overall performance evaluation rating.
2. Cisthct'unlt oa- manding officers vsll:
  - a. review resected performance evaluations.
  - b. conduct an appeal meeting wir> tns member to discuss the perfaiT7rSiTvce evaiuafoan.
3. In response te' a request for a review -of a peiforance evaluation, the distfieVun\* ccmmar.diig officer may require written reports tree- any Individual oeerred appropriate. The

EOE-DI rerfanrarxe SvaSjiScns of .Al &Aom Deaparmen! A,fe-cers Eei-ow tne a/reni as cf 1 ^> Eeptemoer 2317:11 "3 irz Rank cf Sucerte^deT  
•S Chicago-.oJ at Depart-twa; Seo&moer 2017 Page o";3

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

decision of Uie dstrict'uni commanding eacer as to the appropriate rarrnfl is final tar any rating other than "Unacceptable" ana wil db documented in re automated system.

B. Final Level Ssiiew

1. l\*a member's overall performance evaluation rating ret7»a'n: "Unacceptable' after Tie Dnmary appeal w£n the dlsaicttj-it commanding officer, the merJcer may request a secondary review with ere appropriate deputy chief, via the PES, within seven calendar days ol the date die meTibtr .reviewed and refuted to accept the overai performance evaluation ratrsg by the district/unf: coitrrn' andSng officer.
2. In response » a request for a review of a performance evaluation, eve deputy chief may require written reports from any Individual deerted appropriate. The decision of the deputy chief as to the appropriate rating ls \*nal and wil be documented in tire automated system.

Authenticated try; KC

Kev\*5 Navarro  
Acting Superintendent of Police

S3 15-D31

EES-31 .-erf-rrra-ii- iEvaCuBions of .K) Swcyn Department Me-cer. beiaw the  
 Par i. of 3 n>erter>aem  
 ■i Cr.cagc role; Cepart-er;; Seoar.cer 2317

Ctmni as of 1H Sepr-moer 2317:1113 rvs

Page : t cr ' 3

PAGE 36

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

## 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 (
003	Hyde Park	6220 S Stony Island Ave Chic
004	Chicago Vocational	2100 E 87th St Chicago IL 606
' 004	Bowen	2710 E 89th St Chicago IL 606
: 004	Washington	3535 E 114th St Chicago IL 60
005	Harlan	9652 S Michigan Ave Chicago
005	Corliss	821 E 103rd St Chicago IL 606
005	Carver Milit Acad	13100 S Doty Ave Chicago IL (
006	Hirsch Metro	7740 S Ingleside Ave Chicago
006	Simeon	8147 S Vincennes Ave Chicag

007	<b>South Side Occup</b>	7342 S Hoyne Ave Chicago IL
007	<b>Hope College Prep</b>	5515 S Lowe Ave Chicago IL 6
007	<b>Robeson</b>	6835 S Normal Blvd Chicago IL
007	<b>Englewood</b>	845 W 69th St Chicago IL 6062
007	<b>Harper</b>	6520 S Wood St Chicago IL 60
007	<b>Lindblom</b>	6130 S Wolcott Ave Chicago IL
008	<b>Curie</b>	4959 S Archer Ave Chicago IL
008	<b>Goode</b>	7651 S Homan Ave Chicago IL
008	<b>Gage Park</b>	5630 S Rockwell St Chicago IL
008	<b>Hubbard</b>	6200 S Hamlin Ave Chicago IL
008	<b>Bogan</b>	3939 W 79th St Chicago IL 606

PAGE 37

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

<b>Police District</b>	<b>School Name</b>	<b>Address</b>
008	<b>Kennedy</b>	6325 W 56th St Chicago IL 60638
008	<b>Hancock</b>	4034 W 56th St Chicago IL 60629
008	<b>Solorio</b>	5400 S St Louis Ave Chicago IL 60632
" 009	<b>Kelly</b>	4136 S California Ave Chicago IL 60632
" 009	<b>Richards</b>	5009 S Laflin St Chicago IL 60609
009	<b>Tilden</b>	4747 S Union Ave Chicago IL 60609
" 009	<b>Air Force Academy</b>	3630 S Wells St Chicago IL 60609
009	<b>Back of the Yards</b>	2111 W 47th St Chicago IL 60609
010	<b>Farragut</b>	2345 S Christiana Ave Chicago IL 60623
010	<b>Collins</b>	1313 S Sacramento Dr Chicago IL 60623
010	<b>Little Village</b>	2620 S Lawndale Ave Chicago IL 60623
11	<b>Westinghouse</b>	3223 W Franklin Blvd Chicago IL 60624
" 011	<b>Manley</b>	2935 W Polk St Chicago IL 60612
" 011	<b>Marshall</b>	3250 W Adams St Chicago IL 60624
" 011	<b>Al Raby</b>	3545 W Fulton Blvd Chicago IL 60624
" 011	<b>Orr</b>	730 N Pulaski Rd Chicago IL 60624
012	<b>Clemente</b>	1147 N Western Ave Chicago IL 60622
012	<b>Whitney Young</b>	211 S Laflin St Chicago IL 60607
012	<b>Crane Tech</b>	2245 W Jackson Blvd Chicago IL 60612
012	<b>Juarez</b>	2150 S Laflin St Chicago IL 60608
012	<b>Wells</b>	936 N Ashland Ave Chicago IL 60622
015	<b>Douglass</b>	543 N Waller Ave Chicago IL 60644
015	<b>Austin H.S.</b>	231 N Pine Ave Chicago IL 60644
015	<b>Michelle Clark</b>	5101 W Harrison St Chicago IL 60644
016	<b>Taft</b>	6530 W Bryn Mawr Ave Chicago IL 60631
016	<b>Foreman</b>	3235 N LeClaire Ave Chicago IL 60641
017	<b>Von Steuben</b>	5039 N Kimball Ave Chicago IL 60625

017	<b>Roosevelt</b>	3436 W Wilson Ave Chicago IL 60625
017	<b>Carl Schurz</b>	3601 M Milwaukee Ave Chicaao IL 60641

PACE 38

## CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

<b>Police District</b>	<b>School Name</b>	<b>Address</b>
017	<b>North Side Prep</b>	5501 N Kedzie Ave Chicago IL 60625
018	<b>Lincoln Park</b>	2001 N Orchard St Chicago IL 60614
\ 018	<b>Ogden</b>	1250 W Erie St Chicago IL 60642
019	<b>Lake View</b>	4015 N Ashland Ave Chicago IL 60613
019	<b>Lane Tech</b>	2501 W Addison St Chicago IL 60618
U 019	<b>Uplift</b>	900 W Wilson Ave Chicago IL 60640
020	<b>Amundsen</b>	5110 N Damen Ave Chicago IL 60625
j 020	<b>Mather</b>	5835 N Lincoln Ave Chicago IL 60659
020	<b>Senn</b>	5900 N Glenwood Ave Chicago IL 60660
s 022	<b>Morgan Park</b>	1744 W Pryor Ave Chicago IL 60643
r 022	<b>Percy Julian</b>	10330 S Elizabeth St Chicago IL 60643
022	<b>Christian Fenger</b>	11220 S Wallace St Chicago IL 60628
% 024	<b>Sullivan H.S.</b>	6631 N Bosworth Ave Chicago IL 60626
025	<b>Kelvyn Park</b>	4343 W Wrightwood Ave Chicago IL 60639
025	<b>Prosser</b>	2148 N Long Ave Chicago IL 60639
025	<b>Steinmetz</b>	3030 N Mobile Ave Chicago IL 60634
«. 025	<b>North-Grand H.S.</b>	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 3510S. 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 1<sup>st</sup> 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



## XIII. APPENDIX F: DEPARTMENT RESPONSE TO OIG

iDi'HJirIriKnl of'nlife ■ i:ityarCh\tr\*)S9

Ssptcaibci 4,2&SS

Iosi'ph M. Ferguson  
Inspector General  
City of Chicago  
Office of the City Clerk  
131 North Dearborn Street, Suite 200  
Chicago, Illinois 60606

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 and ensuring the safety and security of students, teachers, and other staff of Chicago Public Schools (CPS) is of the utmost importance to the City of Chicago. The Department of Public Safety (DPS) has been working to enhance safety and deter crime. It is in this light that the DPS 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, the City is presently engaged in the latter stage of the implementation of the consent decree with the Illinois Attorney General's Office. This serious undertaking will align our operational practices with best practices and constitutional policing. To achieve this goal, the City's consent decree will require the DPS 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, the City is pleased to find that the review identified in our current policies by the draft consent decree related 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: DPS draft a policy and implement a Memorandum of Understanding (MOU) with the City of Chicago in collaboration with CPS and community stakeholders that establishes a comprehensive program, and that outlines the roles and responsibilities of the SRO.

Department Response: The Department agrees with this recommendation. Pursuant to the draft consent decree, the Department will, by July 2019, undertake best efforts to enter into a MOU with the City of Chicago to ensure a clear understanding of the SRO's role, which clearly delineates the SRO's role and responsibilities.

Enclosed for the City Clerk are the draft MOU and the draft policy. The draft MOU is attached as an exhibit to the draft policy. The draft policy is attached as an exhibit to the draft MOU.

PAGE 41

CPD MANAGEMENT OF SCHOOL RESOURCE OFFICERS REVIEW

procedures for CPD activities in the school grounds, consistent with the law. The City will also ensure that the SRO's role is clearly defined and that the SRO's role is consistent with the law.

Rewnruietidiini M2: C/D should formally outline the SRO's roles and responsibilities, which shall include an explicit provision of SRO\* from interfering in student disciplinary matters.

Department Response: The Department agrees with this recommendation. Before the 2019-2021 school year begins, in consultation with CPS, CPD will develop policy that clearly defines the roles, responsibilities and appropriate actions of SROs, and which will include an express prohibition on the admission of students to CPS discipline by CPD officers. The policy will reflect best practices and will be consistent with collection, analysis, and use of data recording, CPD activities; in CPS schools.

Recommendation #3; CPD have formal SRO recruitment, election, and placement process and screening criteria. Create hiring guidelines that focus on officers' qualifications for working with young people in a school environment.

Department Response: The Department concurs with this recommendation. Its consent decree will require that before the 2019-2020 school year begins, in consultation with CPS, CPD will develop and implement screening criteria to ensure that all officers assigned to work in CPS schools have the qualifications, skills, and abilities necessary to work safely and effectively with students, parents, providers, and school personnel. Only CPD officers who satisfy the screening criteria will be assigned to work in CPS schools.

Recommendation H4: CMH should develop policies requiring school-specific training for officers before they begin working as SROs, as well as a required refresher training. These trainings should emphasize activities to arrest and snitch as well as topics such as: constitutional and civil rights, childhood and adolescent development, appropriate response to student conduct, disability and special education issues, conflict resolution and de-escalation techniques, restorative justice, techniques, and interacting with specific student groups such as those with disabilities, English proficiency or who are lesbian, gay, bisexual or transgender.

Department Response: The Department concurs with this recommendation. As such, under the consent decree, CPD has already continued to ensure that all officers assigned to work in CPS schools will receive specialized initial and annual refresher training that is of high quality, quantity, scope and type, and that addresses subjects related to: (1) school-based legal topics; (2) cultural competency; (3) problem-solving; (4) de-escalation; (5) use of restorative approaches, (6) safety issues, (7) childhood and adolescent development, (8) crisis intervention, and (9) methods and techniques that create positive interaction with specific student groups such as those who are LGBTQIA individuals, a person of color, have limited English proficiency, or who are experiencing homelessness.

Additional Policy: with this, CPD will encourage officers to use alternatives to arrest and referral to juvenile court sentencing, but not to the extent of: issuing warnings, and providing counseling; referral to community services and other mental health.

1. ai. -; cici. Mtd H'Y.: ■ S'm Uk i>> ney m4 ft V: i;M<liifi dl; iiMii:-.i.i.-l - Nia Knirjmn m<J TIN; i.cui^iK". Ij iiiiJi'l.)i2i 5<-<i:nr<

PAGE 42

Rectunmtndatioji &Sj CPD should ifeignaia u program co&fdiiauir id enhance oac-idinalioa atid jiccoytwibiliy.

Department R\*>pi>nse; Al Ihe present time, the SRO pt-ognan functions under the Bureau of Patrol, The Department wiji gfvs care fid consideration to this rcromsncndasKra fof a pta-gram coordinate? for the SRO program moving forward.

The new practices CPD will mil in place m meet the terms of the forthcoming consent decree track very close with the OICs reeomtutridaiknKj. In Ditl, nearly all of the OJO's rttfommerdalEoiis are incorporated irtio ihe tenuis of the -diaft eoisstrnt &eice-,

The Chieap Police Department is ecttain ihai it will deliver on wealing a strong SRO program reeled in jSrtmirslji between CPD and CPS, tlat meets national kest practice\*standards, and pnjWcts sSutk-nts' civil rights, Nonetheless, the Department welcomes the opportunity to discuss with ycu any of ihe recommendations thai you do n«i« believe we have addressed by ihU Micror by the draft conscait decwe.

Superimeiidcn? of Police

irriyro mtj TI V: M-i ■ Nm ejki'th v tni TTV; ' ••"l-.fi GiJ iiflllsi 3-1-1 - ?Vuui Kmrrpro. ,m| if I V; (outSntt-cilV liriiniVsi I -I "-IMOif i

PAGE 43

## 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.

*Cover image courtesy of Creative Commons*