



COPS Evaluation Brief No. 3

CREATING A CULTURE OF INTEGRITY



COMMUNITY ORIENTED POLICING SERVICES
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Jack McDevitt
Amy Farrell
Russell Wolff
Institute on Race and Justice
Northeastern University
Boston, Massachusetts

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The Internet references cited in this publication were valid as of the publication date of this document. Given that URLs and web sites are in constant flux, neither the authors nor the COPS office can vouch for their current validity.

ABOUT THE AUTHORS

Jack McDevitt, Ph.D.

Dr. McDevitt is the Associate Dean for Research and Graduate studies at the College of Criminal Justice at Northeastern University and also directs the Institute on Race and Justice and the Center for Criminal Justice Policy Research. The coauthor of three books—*Hate Crimes: The Rising Tide of Bigotry and Bloodshed*; *Hate Crime Revisited: American War on Those Who Are Different* (both with Jack Levin), and *Victimology* (with Judy Sgarzy)—he has additionally published numerous articles on a wide variety of topics in criminal justice. He is the coauthor of a number of reports on racial profiling including a monograph for the U.S. Department of Justice and statewide reports from Rhode Island and Massachusetts on the levels of disparity in traffic enforcement. Dr. McDevitt has spoken on hate crime, racial profiling, and human trafficking both nationally and internationally and has testified as an expert witness before the Judiciary Committees of both the U.S. Senate and the U.S. House of Representatives and as an invited expert at the White House.

Amy Farrell, Ph.D.

Dr. Farrell is an Assistant Professor in the College of Criminal Justice and the Associate Director of the Institute on Race and Justice at Northeastern University. Her research focuses on disparity in the criminal justice system. Her primary interests include racial and gender differences in traffic enforcement, disparate prosecution and sentencing outcomes in state and federal criminal justice, and bias crime reporting. Recently, she conducted research on local law enforcement responses to human trafficking and is leading the development of a national human trafficking data-collection program for the Bureau of Justice Statistics. Dr. Farrell is a co-recipient of the National Institute of Justice's W.E.B. DuBois Fellowship on crime justice and culture.

Russell Wolff, M.S.

Mr. Wolff is a Senior Research Associate in the Institute on Race and Justice and Center for Criminal Justice Policy Research at Northeastern University. His research interests include police management and accountability, youth and gang violence, and urban public policy. Currently, he is part of the Northeastern University research team working with the city of New Bedford, Massachusetts's multiagency collaboration to prevent and respond effectively to youth gang violence. Mr. Wolff also is pursuing a Ph.D. in criminology and justice policy at Northeastern.

LETTER FROM THE DIRECTOR

Dear Colleagues:

Since 1996, the Office of Community Oriented Policing Services (the COPS Office) has been assisting law enforcement agencies through a variety of initiatives to create or strengthen local programs that improve police/citizen relations and build trust with the communities that they are sworn to serve and protect. Our long-standing commitment to strengthening police-citizen partnerships has resulted in significant changes in policies and procedures among local law enforcement agencies.

As part of the Police Integrity Initiative, the COPS Office seeks to improve the effectiveness of law enforcement agencies by strengthening the climate of trust, cooperation, and partnership between the police and their communities. Past and ongoing strategies to achieve this objective include developing best practices and model problem-solving partnerships, information dissemination, and national training on important issues related to police integrity.

COPS Evaluation Brief No. 3: *Creating a Culture of Integrity* was developed through a collaborative partnership with the Lowell, Massachusetts, Police Department and Northeastern University, Boston, to examine the Police Integrity Initiative and inform the COPS Office of the benefits of a major COPS Office police integrity program and the successes and challenges faced by grantee agencies.

The COPS Office understands the importance of learning from the experience of others. It is in this spirit that we are pleased to share this study of local approaches to addressing concerns about racial bias in policing. We hope that you will find this publication helpful in your local efforts, and we encourage you to share this publication, as well as your successes, with other law enforcement practitioners.

Sincerely,



Carl R. Peed
Director

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SECTION 1

During the last 2 decades, the concept of integrity within policing has been refashioned. Traditionally, law enforcement focused primarily on preventing misconduct by individuals or groups of individuals in the agency, often viewing their problems in isolation. They took steps to root out the proverbial “rotten apple” (Knapp Commission, 1973: 6) through employment screening prior to hiring and aggressive punishment in the event of wrongdoing once inside the organization. With the offender gone, the agency considered the problem solved. Nevertheless, a single officer often reflected an organizational problem that, left unaddressed, would continue to foster misconduct. Rooting out and disciplining officers for misconduct and corruption are necessary tasks. Yet in many cases cultural, structural, or institutional factors may be fostering an environment that encourages these behaviors and simply prohibiting particular behaviors may not be sufficient to promote sound, ethical judgment among all officers. Failing to address such issues is likely to result in more officers acting without integrity. Seeking to create lasting change, police administrators are beginning to expand their focus on integrity by addressing the broader context of the organization. Although many topics are considered debatable within the policing community, few in law enforcement would question that agency integrity should be of the highest priority for everyone.

Police integrity has been described succinctly as “a product of both actual police behavior and public perception of that behavior” (Greene et al., 2004). Organizational integrity emphasizes the reality that the environment in which employees work can contribute tangibly to officer misconduct. The importance of organizational culture in fostering and preventing misconduct and corruption, including police brutality and excessive use of force, is well-documented (e.g., Skolnick and Fyfe, 1993; Kappeler et al., 1998; O’Hara, 2005; Walker, 2005). Moreover, a recent study examining the relationship between aggressive policing and citizen complaints suggests that the ability of a precinct commander to promote respectful policing and alter the organizational culture unconcerned with citizen complaints may help reduce complaints without sacrificing enforcement (Davis et al., 2005).

Klockars et al., (2004) cites organizational rule-making; detecting, investigating, and disciplining rule violations; and circumscribing the “code of silence” as the efforts that appear to be most germane to influencing how fully an organization exhibits integrity. Additionally, under the American system of democratic policing, public perceptions are often vital to our assessments of whether a police department is thought to possess integrity. Organizational integrity in policing also requires striving for an inclusive relationship with the public, a component that is vital to viewing the police as legitimate, fair, and just. This perception is key to law enforcement’s effectiveness (National Research Council, 2004: 6).

In the wake of high-profile incidents of police use of force (e.g., the beating of Rodney King by Los Angeles Police Department officers) and claims of increasing public distrust of law enforcement over perceived biased treatment during traffic stops and other interactions, the Federal Government began to consider ways to support broader institutional change in the field of policing. Congress had already demonstrated a strong recognition of the importance of organizational accountability with the passage in 1987 of the *Federal Sentencing Guidelines for Organizations* that offered organizations the possibility of reduced sentences to the extent that they had taken good-faith steps to implement certain organizational safeguards against illegal and unethical behavior. Seeking to address this broader context within law enforcement, the Federal Government took a

number of steps to focus attention and resources on the issue of integrity in policing. One major step was the congressional authorization for the U.S. Department of Justice (DOJ) to bring civil action against law enforcement agencies found to have engaged in a “pattern or practice” of behavior that deprives individuals of their civil rights as part of the 1994 Violent Crime Control and Law Enforcement Act (42 U.S.C. § 14141). Following this change, attorneys in the Special Litigation Section of the Civil Rights Division of the DOJ began to conduct investigations of law enforcement agencies alleged to have engaged in such a pattern or practice of conduct. If an investigation turned up wrongdoing, the agency could enter into a consent decree (which does not require the agency to accept the investigation’s findings) or refuse to cooperate, in which case the issue would be resolved through litigation. In the case of a consent decree, often a court-appointed monitor is put in place to oversee the agency’s efforts to meet mandated improvements. The DOJ can also settle the matter privately with a Memorandum of Agreement (MOA) that does not carry with it the judicial enforceability of a consent decree and does not require the law enforcement agency to admit culpability.

The DOJ entered into the first of such consent decrees with the Pittsburgh Bureau of Police (PBP) in April 1997. Shootings of minority community members and other incidents of misconduct committed by PBP officers led to a federal investigation. In the consent decree, the PBP agreed to establish a comprehensive early warning system, develop and implement a use-of-force policy, require officers to file appropriate reports, conduct quarterly audits and reviews of potential racial bias, improve investigative practices concerning alleged officer misconduct, apply appropriate disciplinary measures, oversee an expansion of cultural training for all officers, and appoint an independent auditor to ensure compliance with the consent decree (McMickle, 2003). This set of remedies represents an attempt not just to improve disciplinary rules but to rework the organizational environment in which officers exist. As illustrated in the mandates of the PBP consent decree, agency’s policies, procedures, and practices were believed critical to establishing and promoting a culture of integrity among officers.

From the enactment of this legislation in 1994 to 2006, the Justice Department has investigated or is monitoring 21 law enforcement agencies as a result of complaints stemming from a pattern or practice of civil rights violations (USDOJ, 2007). Although this is an important step, it should be noted that pattern or practice legislation and investigations certainly have not ended excessive use of force by the police. Since the assault on Rodney King, New York (City) Police Department officers shot and killed Amadou Diallo in 1997 and assaulted Abner Louima in 1999. In 2001, a Prince George’s County, Maryland, police officer was convicted of violating a homeless man’s civil rights by releasing her police dog on him after he had surrendered. In 2004, an Atlanta police officer, who had been reprimanded or suspended without pay 13 times since 2001, was videotaped assaulting a woman outside the city’s main airport (Associated Press, 2004). More recently, in May 2007, protesters and reporters were attacked by police during an immigration rally. As a result of this incident, one high-ranking officer was demoted and another was reassigned (Geis, 2007) and more than 250 claims were filed against the city (Rubin and Gorman, 2008).

Creating a Culture of Integrity Initiative

Through the enactment of pattern or practice authority, Congress provided the Department of Justice with the means to actively promote significant culture change that would increase integrity

in law enforcement agencies that were found to have abused the public trust. During the mid-1990s, the DOJ also began supporting proactive measures to avoid the kinds of situations that might result in litigation. In 1996, the COPS Office and the National Institute of Justice held a symposium on police integrity in Washington, D.C., during which police executives, researchers, representatives of community organizations, and other police observers discussed ways to promote integrity in policing. The symposium made the issue of organizational integrity a high priority and opened the door for law enforcement agencies to begin experimenting with different models for enhancing integrity.

In 1999, the United States Attorney General held a second conference attended by police executives, union representatives, academic experts, and civil rights and community leaders that “highlighted the need to identify police practices that build trust, enhance police accountability, and reduce police misconduct” (USDOJ, 2001: 1). Participants at the conference and subsequent meetings worked “to identify and develop general principles of police practices that are effective in promoting police integrity” (USDOJ, 2001: 1). Discussions focused on several areas identified in the earlier symposium including use-of-force policies, citizen complaint processes, accountability and effective management, training, nondiscriminatory policing and data collection, and recruitment and hiring practices. An important element of these conferences’ dialogs was the recognition that establishing and maintaining integrity requires cultural changes within the organization.

Following these efforts, the COPS Office funded law enforcement agencies to implement the kinds of strategies identified above. These strategies covered a wide range of activities aimed to create cultural changes that promote integrity inside the agency as well as in the agency’s relationship with the public. Grants were awarded to support projects involving one of the following strategies, although several grantees’ projects involved more than one of these areas (see Figure 1 for the distribution of grantees by primary strategy area):

- **Ensuring Accountability to the Community**

Funding under this strategy area was intended to assist grantees in developing a proactive organizational accountability system to engage the community in defining law enforcement services. The system included performance measures that reflect collaborative decision-making between the agency and the community. Sites received funding for such initiatives as community surveys and focus groups, a racial reconciliation conference, police-community advisory councils, police-community trainings, and publications clarifying various aspects of policing for the public.

- **Development of Early Intervention Systems**

Early Identification and Intervention Systems (EIS) track agency-selected data associated with an officer’s performance (for example, the number of sick days, citizen complaints, and/or use-of-force incidents) and alert an officer’s supervisor when a predetermined threshold (for example, number of events over a certain period) is crossed to determine whether further nondisciplinary action should be taken to prevent escalation to actual misconduct. The goal of funding awarded under this strategy area was to help grantees establish or improve a comprehensive EIS that will help identify precursors of police officer problem behaviors and to intervene before these behaviors become police misconduct. Funding could also be used to show how these systems and related policies and procedures strengthen management, enhance police accountability, and improve community relations.

- **Recruiting Quality Personnel from Local Communities**

Funding was intended to assist the agency in creating a police workforce that reflects the demographics of the community being served using reliable, valid recruitment and hiring methods to bring in quality people.

- **Command Staff Training on Ethics and Integrity Issues**

Funding assisted agencies in providing targeted ethics- and integrity-related command staff training on topics such as racial profiling issues and dilemmas, EIS, managing use-of-force issues, and citizen complaint intake and investigation. Target audiences included commanders or other officers who will be advancing to leadership positions in the near future.

- **Use-of-Force Policy and Training**

The funding assisted agencies in developing new policies or strengthening an existing policy to manage officer use of force and to develop training that will help line officers and command staff understand and implement use-of-force policies.

- **Traffic Stop Data Collection**

Funding helped agencies in developing a process for collecting, interpreting, and analyzing traffic stop data to identify potential disparities in practices that might indicate biased-based policing.

- **Strengthening Internal Affairs Division (IAD) Operations**

The funding assisted agencies in analyzing current IAD processes and in determining the areas that need strengthening such as processes for receiving external and/or internal complaints, the thoroughness of investigations, how the investigations' outcomes are presented to the officers involved, how complications caused by complicated legal and contractual issues are dealt with, and how media publicity is managed.

- **Self-Assessment Techniques for Internal Monitoring**

This funding assisted agencies in proactively monitoring potential police integrity issues by tracking organizational performance and behavior through self-assessment procedures that can take the form of an agency auditing process or the introduction of other internal/external monitoring.

- **Outreach to minority youth**

Funding helped agencies to develop a process for engaging the minority youth in their community with the goals of facilitating mutual education and understanding, building trust, and fostering long-lasting collaborative partnerships.

- **Improving Citizen Complaint Processes**

Funding was intended to help agencies improve their citizen complaint processes by evaluating how complaints are received, how they are responded to internally, and how to make the process transparent to the community (e.g., by posting complaint forms on the Internet and educating citizens about the process). Enhancements also included follow-up interviews with citizens as a quality control mechanism.

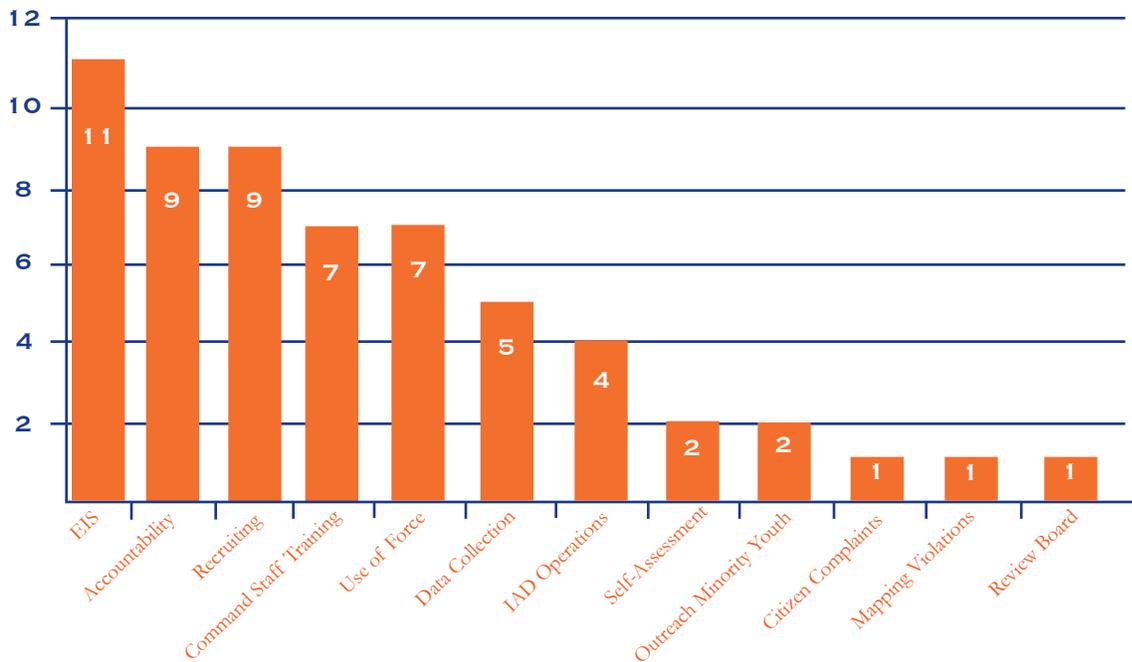
• Mapping Integrity Violations and Related Interventions

The goal of funding was to help agencies use mapping technology to visually map a broad range of integrity-related violations; analyze patterns across districts, precincts, beats, and/or supervisors; and develop relevant recommendations before behavior escalates into police misconduct.

• Utilizing a Civilian Review Board

The funding was intended to assist agencies in assessing the challenges associated with implementing a model civilian review board. These challenges may include the number and composition of people represented on the board, whether citizens conduct their own investigations, how long the process takes to complete, and how much citizens should rely on the police for information. Other considerations include how the board interfaces with the department, how backlogs can be reduced, and the final disposition of decisions.

Figure 1: Number of CCI Projects by Primary Strategy Area (N=59).



The COPS Office funded 59 law enforcement agencies under the Creating a Culture of Integrity (CCI) initiative. Of the grantees, 14 received between approximately \$50,000 and \$75,000; 9 sites received between approximately \$100,000 and \$125,000; 35 agencies received approximately \$125,000; and 1 site received \$250,000.

Creating a Culture of Integrity Evaluation

To help agencies learn from the experiences of CCI recipients, the COPS Office partnered with the Lowell, Massachusetts, Police Department (LPD). The LPD was one of five law enforcement agencies that had been awarded a “Police as Problem Solvers and Peacekeepers” grant to develop best practices in a specific practice area and provide technical assistance to grantees under the COPS Office’s Promoting Cooperative Strategies to Reduce Racial Profiling (PCSRRP) initiative, another grant initiative under the COPS Office police integrity program umbrella. Lowell provided training for police and community members on positive and effective police-community interaction in a diverse city.¹

To better understand the value of the CCI grants to law enforcement agencies in fostering organizational cultures of integrity, the COPS Office supported a research partnership between the LPD and the Institute on Race and Justice (IRJ) at Northeastern University in Boston, to conduct an evaluation of the programs funded through CCI. The role of the IRJ and the LPD in CCI also included providing technical assistance. To help sites with implementation and other related issues, the LPD hosted several technical assistance conferences. Many agencies had questions about how they should go about preparing their final report to the COPS Office. The IRJ provided a final report outline that, in addition to helping grantees write a useful summary of their efforts, would help sites focus on the elements that the COPS Office was interested in assessing. Both the IRJ and the LPD communicated with the grantees to help them produce both their progress and final reports.

Evaluation Methodology

The present evaluation is designed to answer three broad questions:

Question 1: How was COPS Office funding used to meet project goals and objectives?

Question 2: What are the successes and challenges grantees experienced when developing and implementing these projects?

Question 3: What is the impact of CCI funding on advancing police integrity and creating cultures of integrity?

Discussions with the grantees, examination of written progress reports, site visits, and final project documentation informed this evaluation for the first two questions, namely, how funding was used to implement agencies’ initiatives and the successes and challenges experienced by the grantees during implementation. Arriving at an answer to the third question—how these projects

1. The Colorado Springs, Colorado, Police Department implemented the Police Accountability and Service Standards model to measure reactive and proactive policing with the community as partners in establishing and monitoring police performance standards. The Knoxville, Tennessee, Police Department conducted training for police and community members in strategic planning and problem solving to strengthen police-community partnerships, improve quality of life in the city, maximize resources, and enhance coordination of efforts. The Sacramento, California, Police Department implemented the Quality Service Policing model to enhance trust between the police and community through object measures of officer performance, particularly concerning traffic stops. The Tampa, Florida, Police Department worked to identify and assist members of the department showing symptoms of job-related stress or personal problems by providing psychological services.

advanced police integrity and helped create cultures of integrity within these organizations—was less straightforward. For a deeper insight into the nature of the funded strategies and grantees’ experiences implementing them, the IRJ selected six sites representing a range of CCI grantee strategies for in-depth case studies. Researchers from the IRJ selected the sites within each program area that were far along enough in their program implementation and/or had particular innovative program models for more in-depth study. The review took into account the need to include a variety of different types of sites based on the size of an agency and jurisdiction, region of the country, differences between police and sheriff’s departments, and funded strategy area. As a result, the IRJ visited or conducted extended conversations with participants of six projects that are described in detail in Section III.

The first question researchers addressed was the most basic and the most challenging: What is police integrity? The question is addressed in detail in Section II.

SECTION II

“What is police integrity?” This is an essential question for this evaluation and for the future efforts of law enforcement in creating cultures of integrity. At present, there is no commonly accepted definition or method of measuring police integrity. Despite the extremely decentralized nature of policing in the United States, it is important for the broad understanding of integrity to be applicable across agencies and regions. There is a national movement toward the development and dissemination of “best practices” in law enforcement generally and to enhance the integrity of police organizations in particular. Several important developments show the impetus for, and in some cases likely the results of, this growing trend. Our accounting is by no means intended to be exhaustive, merely illustrative.

The 20th century saw numerous efforts to professionalize law enforcement. One of the most significant took place in 1929 when the International Association of Chiefs of Police (IACP) established the *Uniform Crime Reports* to begin the systematic collection of crime data across the U.S. and the FBI agreed to implement the program. With the publication of the Wickersham Commission reports in 1931, which include the *Report on Lawlessness in Law Enforcement*, law enforcement witnessed the first national study of American police practices. The Knapp Commission, operating in the early 1970s to investigate practices in the New York City Police Department, is considered the “turning point in modern consciousness about police misconduct” (Prenzler, 2002: 7), having uncovered an entrenched culture of corruption among law enforcement. These early developments helped move the national dialog within the professional law enforcement community toward identifying practices that agencies could adopt to promote integrity and prevent improper behavior.

Since its establishment in 1994, the COPS Office has developed numerous programs that have facilitated the dissemination of knowledge and funded the adoption of best practices by law enforcement agencies across the United States. They include initiatives to facilitate the adoption of technology (Making Officer Redeployment Effective [MORE] and Information Systems Technology Enhancement Project [ISTEP]), foster innovation in dealing with particular issues of importance to law enforcement (gang crime, methamphetamine distribution and use), and provide training and technical assistance (Regional Community Policing Institutes [RCPI]). In addition, a number of respected research organizations and police advocacy associations such as the Police Executive Research Forum and the Police Foundation are dedicated to conducting research on the police and disseminating the research to law enforcement. The Commission on Accreditation for Law Enforcement Agencies, established in 1979, also promotes the adoption of a set of policing standards through a voluntary accreditation process. Additionally, the IACP promulgates codes of ethics and conduct for law enforcement that represent the consensus of its membership in the U.S. and internationally. The codes concern professional police practitioners’ expectations of how law enforcement officers should behave while on duty and in their private lives to keep the public trust, as well as how agencies should operate concerning the responsibilities and duties of a police officer, discretion, use of force, confidentiality, integrity, and cooperation with other agencies.

In this environment of growing national and international interest in propagating successful strategies across the field, it is important that discussions of police integrity aim toward consensus about what this concept means, how to achieve it, and how to measure it. At the time the Creating a Culture of Integrity (CCI) Initiative was funded, there was little agreement about the exact nature and measurable qualities of police integrity. Consequently, the COPS Office did not instruct grantees on specific steps they needed to accomplish to achieve cultures of integrity; rather, agencies were encouraged to develop cultures of integrity organically, within the history and context of their own organizations.

In this section of our report, we examine the variety of implementation strategies that are within each broad integrity area and compare the relative strengths of each funding area. But to move beyond discussion of implementation issues and address the extent to which these projects helped create cultures of integrity, we need to apply a uniform framework across all grantees to assess this concept of integrity.

Developing a Framework

In our efforts to build a conceptual framework for understanding police integrity, we explored the academic literature as well as the major national policy initiatives in the area of police integrity. Through the grants provided by the COPS Office, sites implemented practices they believed would allow them to achieve one or more important community policing outcomes such as accountability, transparency, community engagement, and/or data-driven decision-making. Although numerous agencies implemented projects that built on existing initiatives or were in conjunction with other integrity-related projects, as noted above, there was no clear, widely accepted road map for achieving an organization having integrity for all its decisions and employees.

Participants in the 1996 National Symposium on Police Integrity provided some guidance, stating that “Integrity—as it applies to police service—is a series of concepts and beliefs that, combined, provide structure to an agency’s operation and officers’ professional and personal ethics” and includes “honesty, honor, morality, allegiance, principled behavior, and dedication to mission” (McDonald, Gaffigan, and Greenberg, 1997: 86).

But what are the qualities of the CCI initiatives that support and foster these concepts and beliefs and ultimately the changes in organizational culture? From what mixture of these ingredients does integrity arise?

Current Ideas on Integrity

In the research literature, we found many studies that address issues of misconduct and various integrity-related components (e.g., citizen oversight models, use-of-force policy and procedure), but few appear to offer models that define and seek to measure police integrity more broadly. The term integrity is used in a number of different ways, but often as though it had a readily and commonly understood meaning in the context of policing. As the participants of the 1996 National Symposium on Police Integrity noted, however, integrity and ethics are often used interchangeably. In one sense, this is positive, because the idea of ethics promotes the practice of positive behavior and the application of a set of principles to future encounters. In much of the literature, integrity has been discussed as the absence of corruption rather than as a concept endowed with its own value. In an address to the United Nations, Hubert Williams (1986), the president of the Police

Foundation and former police director of the Newark, New Jersey, Police Department, referred to police corruption as “the lack of police integrity,” defining integrity only as a negative image of corruption. More recently, in the *FBI Law Enforcement Bulletin*, John H. Conditt, Jr. (2001), former chief of the FBI’s Internal Investigative Unit 1 in the Office of Professional Responsibility, discussed institutional integrity in the context of preventing corruption.

To the extent that attempts have been made to measure integrity, researchers frequently use the term integrity to refer to individual officers and the degree to which they abstain from misconduct or corruption. Even as Klockars, Ivkovic, and Haberfeld (2004) note the shift from viewing misconduct as a reflection of the morals of the individual officer to the recognition that there is “an organizational and administrative responsibility” to enhance police integrity, they focus almost exclusively on individual officers’ interpretation of agency rules. The focus of their research is on organizational prevention of misconduct, rather than on organizational efforts to promote positive individual behavior, as well as culture change that fundamentally changes the organization’s relationship with internal and external stakeholders.

Kaptein and van Reenen (2001) provide perhaps the most useful guidance through a sophisticated framework to assess integrity management in an agency. They describe integrity management in police organizations as an ongoing effort to keep three relationships in balance: 1) between the employees and the organization; 2) between employees within and across their functions; and 3) between the organization and its stakeholders. When the balance of one or more of these relationships is in conflict, it can result in incompetence, misconduct, or corruption. Based on their research, the authors offer seven “organizational virtues or qualities...which collectively constitute the organization’s integrity” (290). These include: clarity, consistency, achievability, supportability, visibility, discussability, and sanctionability. While Kaptein and van Reenen argue that “the integrity of a police organization is found in the organization itself (culture and structure),” they expressly address the importance of an agency’s relationship with its external stakeholders, a collaboration of great importance within community policing (Kaptein and van Reenen, 2001: 282). Similarly, participants in the 1996 Department of Justice Symposium also noted that broadening the discussion from the individual officer and internal corruption investigations to the organization shifted focus to other important areas: “leadership, command behavior, supervision, organizational structure, selection, hiring, training, the disciplinary system, the police subculture, community values, and political and economic conditions” (USDOJ, 1997: iii). The strategy areas that the COPS Office funded under the CCI initiative flow from these priorities.

Although addressing ethics rather than integrity specifically, researchers Johnson and Cox (2005) identify organizational culture as the most significant obstacle to the reform of police organizations. They argue that not only is it vital for agency leadership to buy into the need for culture change for agencies to improve but the professional policing organizations such as the International Association of Chiefs of Police must also make the pursuit of such change a priority. This would include promoting such initiatives as the true integration of ethical decision making into academy training rather than providing a minimal, stand-alone unit near the conclusion of training. The authors recognize that the institution and diffusion of organizational change requires the embrace of the broader field, not simply individual organizations motivated to institute reforms. Professional organizations are important to this endeavor, but so too are the formal and informal channels of communication between agencies in encouraging shifts in organizational priorities.

Measuring Integrity: Important Relationships

Based on the existing academic research on organizational integrity broadly, the experience of police practitioners, and the priorities embodied in the current policing environment, there appear to be three broad types of relationship that are important when approaching the issue of police integrity: 1) the relationship between employees and the organization; 2) the relationship between the organization and community stakeholders; and 3) the relationship between the organization and the broader field of law enforcement. These relationships are briefly summarized below:

Internal Integrity—Within the Agency

Several factors influence the extent to which the agency itself promotes an environment of accountability, fairness, and openness—for example, whether policies and procedures adequately provide for monitoring of officers and supervisory accountability, whether these policies and procedures are followed in practice, whether discipline is applied fairly and consistently, and whether positive behavior is rewarded and modeled in the higher ranks. The extent to which an integrity-related initiative is part of a comprehensive effort or a one-time project with no plans for sustaining it demonstrates to officers its relative importance to the leadership of the organization.

External Integrity—Between Agency and Community

The community consists of many different constituencies including neighborhood groups, advocacy organizations, media outlets, other government agencies, and individual residents. Here, we speak of community primarily in terms of members of the public and the organizations and leaders who speak for them, a group commonly referred to as stakeholders. The nature of the relationships between the agency and various community constituencies is particularly important in discussing whether an agency can be considered to possess integrity.

External Integrity—Between Agency and Profession

The profession of policing has developed an agreed-on set of policies and procedures that represent a minimum set of expectations of a professional policing organization. What a police agency considers to be professional behavior, what is thought to be beyond the pale of legitimate law enforcement, and what initiatives are actually implemented are powerful influences on other agencies. By providing materials or sharing resources, such as training, with other agencies, “best practices” can be diffused throughout the field to become standard operating procedures.

Methodology

To examine the CCI projects across sites in a systematic manner that addresses the degree to which the grantees pursued cultures of integrity, we developed a list of factors, based on the research and discussion above, that take into account implementation issues as well as internal and external culture change.

Integrity Components

We identified six categories:

1. Completing the project.
2. Integrating the project.
3. Decreasing officer misconduct.
4. Increasing community trust.
5. Advancing the profession.
6. Sustaining the project.

We also established a template and process for “scoring” each site. Figure 2 breaks down these categories to show their associated variables and further clarification of how the measures are operationalized.

Figure 2: Integrity Components and Associated Variables.

Category	Variable
1. Completing the Project.	<ul style="list-style-type: none"> • Was the project completed? <ul style="list-style-type: none"> - To what extent was the end goal of the project achieved? • Was the project implemented as proposed? <ul style="list-style-type: none"> - To what extent did the agency implement the project activities as proposed (addresses planning issues)? • Did the agency submit a final report? <ul style="list-style-type: none"> - Did the grantee agency submit a report specifically to the COPS Office detailing the activities and results achieved through CCI funding and a discussion of the challenges encountered and other important issues?
2. Integrating the Project.	<ul style="list-style-type: none"> • Did the project build on another initiative to enhance integrity? <ul style="list-style-type: none"> - To what extent was the agency already engaged in the development or enhancement of an integrated comprehensive system of organizational integrity prior to CCI funding? • Was the project implemented in concert or at the same time as another initiative to enhance integrity? <ul style="list-style-type: none"> - To what extent did the agency implement other integrity-related initiatives at the same time as the primary CCI-funded strategy (includes both additional CCI-funded and other efforts)?

<p>3. Decreasing Officer Misconduct.</p>	<ul style="list-style-type: none"> • Did the project increase monitoring of officer behavior? <ul style="list-style-type: none"> - To what extent did the project create or enhance mechanisms for tracking what officers do? • Did the project create cultural change? <ul style="list-style-type: none"> - To what extent did project activities shift the organizational culture toward one of integrity? • Did the project increase managerial/supervisory accountability? <ul style="list-style-type: none"> - To what extent did the project create or enhance mechanisms that explicitly increase the level of managerial or supervisory accountability for subordinate officers' actions?
<p>4. Increasing Community Trust.</p>	<ul style="list-style-type: none"> • Did the project make positive connections with individuals or groups in the community—instilling trust and confidence through relationships? <ul style="list-style-type: none"> - To what extent did the project create or enhance existing positive relationships with community constituencies? • Did the project increase communication or transparency about agency efforts to enhance integrity—instilling trust and confidence through information? <ul style="list-style-type: none"> - To what extent did the project create or enhance organizational transparency through the outward flow of information about integrity-related efforts?
<p>5. Advancing the Profession.</p>	<ul style="list-style-type: none"> • Did the agency look to other agencies with experience implementing a similar initiative? <ul style="list-style-type: none"> - To what extent did the agency build the CCI initiative on the experience of others in the field to promote a national repertoire of best practice? • Did the agency offer anything to other law enforcement agencies (training, information via professional conference; materials describing best practices, for example)? <ul style="list-style-type: none"> - To what extent did the agency share information or services related to integrity with others in the field?
<p>6. Sustaining the Project.</p>	<ul style="list-style-type: none"> • Did the project continue after funding was terminated? <ul style="list-style-type: none"> - To what extent were mechanisms put in place to institutionalize or otherwise sustain the project?

Scoring

To indicate the extent to which the grantee had addressed the factors identified for each component, we gave scores to the variables within each category. Although grantees could reasonably be expected to accomplish most of these factors in the course of implementing their projects, in cases where the type of project would not be expected to address a particular element, a score of “not applicable” or “N/A” was given.² The scoring options could vary depending on the variable. Appendix A provides a full description of the scores for each variable. Generally, however, scores referred to whether the grantee had fully achieved a result or had gone beyond expectations (“+”), had achieved most goals, was likely to achieve a result in the future, or had attempted to achieve a result (“=”), had proposed an activity to address the issues but had not followed through (“—”), or had not planned to address the project plans at all (“—” or “not applicable,” depending on the specific variable). In cases where insufficient information was available to make a determination on a particular factor, a score of (“?”) was used to reflect this situation.

Scoring Process

We established a process to enhance the consistency of scoring and trained two project staff members on the scoring process, after which they reviewed each site’s project materials and scored them on the variables associated with the six integrity categories. When these scores differed between the two trained researchers, the project manager reviewed the materials to reconcile the difference and determine what score to assign.

There is an important caveat to the scoring process used in the present study. With some exceptions, such as sites that were the subject of case studies, the scoring process relied on the materials provided by the grantees to the Institute on Race and Justice and the Lowell Police Department. This has had two significant implications: 1) although numerous efforts were made to obtain missing information (e.g., final reports) over the course of the evaluation, several sites could not provide the requested information, and 2) the information provided by sites varied widely in quality. As a result, the scoring process is intended to identify broad trends within and across strategy areas rather than to assess specific project characteristics or evaluate the success of any particular program.

Figure 3 provides an example of the scoring matrix to illustrate the scoring structure. The full matrix can be found in Appendix B.

2. The response set for certain variables did not include a score of “N/A.” Variables in the increasing community trust section and one variable in the decreasing officer misconduct section (concerning the extent to which the grantee attempted to institute culture change) did not have this option, based on the notion that a COPS Office-funded program explicitly labeled a culture change initiative could reasonably be expected to address such fundamental issues as community involvement and culture change.

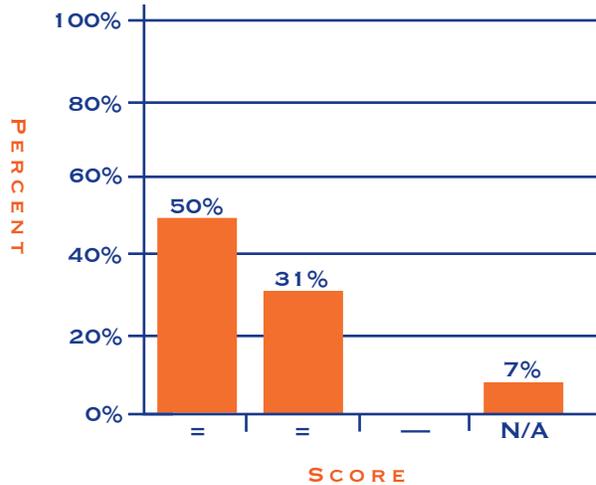
Figure 3: Example of Accountability Grantee Section of Integrity Scoring Matrix.

Strategy	Agency	1. Implementing the Project				2. Integrating the Project				3. Taking Steps to Decrease Officer Misconduct				4. Increasing Community Trust				5. Advancing the Profession				6. Project Sustainability			
		Project Completed	Implemented as Proposed	Final Report Submitted	Built on Previous Initiative	Implemented at Same Time	Increased Officer Monitoring	Increased Supervisory Accountability	Made Positive Connection with Community	Increased Communication with Transparency	Looked to other Agencies	Provided Services to Profession	Continued after Funding	Project Completed	Implemented as Proposed	Final Report Submitted	Built on Previous Initiative	Implemented at Same Time	Increased Officer Monitoring	Increased Supervisory Accountability	Made Positive Connection with Community	Increased Communication with Transparency	Looked to other Agencies	Provided Services to Profession	Continued after Funding
Accountability	Department A	+	=	=	+	-	N/A	N/A	+	+	N/A	+	+	+	+	+	+	N/A	+	+	+	+	+	+	+
	Department B	+	=	-	=	N/A	N/A	+	+	+	N/A	+	+	+	+	+	+	+	+	+	+	+	+	+	=
	Department C	+	=	=	+	-	+	N/A	+	+	N/A	+	+	+	+	+	+	+	+	+	+	+	+	+	+

Project Completion

The basis of any evaluation is an examination of the extent to which participants were able to complete the proposed work. Overall, the grantees were able to implement most elements of their initiatives, with 58 percent appearing to fully complete all aspects and 31 percent completing some or most of their projects. Seven percent of grantee projects are ongoing and the agencies have received extensions. Several sites received one or more extensions during the course of their project. Many of the strategies funded under CCI are difficult to implement fully, particularly within the amount of time allotted, but it seemed that the vast majority of the grantees were able to complete most of the components of their projects. The distribution of scores across all 59 projects is provided in Figure 4.

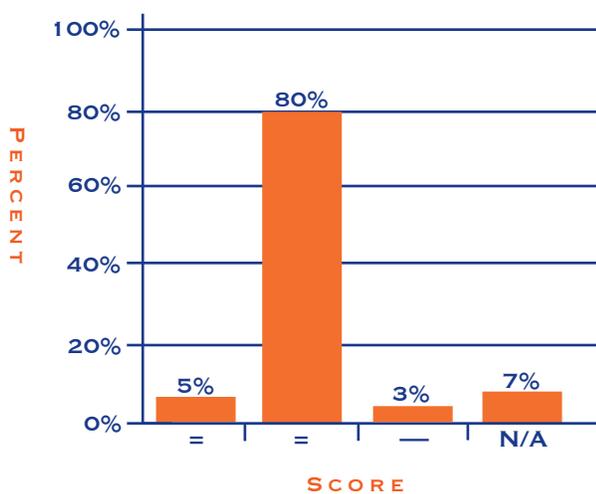
Figure 4: Percent* of Grantees by Score: Was the Project Completed? (N=59)



* 3 sites (5 percent) had scores of “?”

Very few sites implemented a project radically different from the plans they originally submitted. Eighty percent implemented many or all of the elements originally proposed, and 5 percent implemented another integrity-related component in addition to the project originally proposed. A handful of sites (3 percent) implemented few or none of the elements initially proposed. As noted above, 7 percent of sites experienced significant delays and were granted no-cost extensions to finish their projects. Figure 5 shows the distribution of scores.

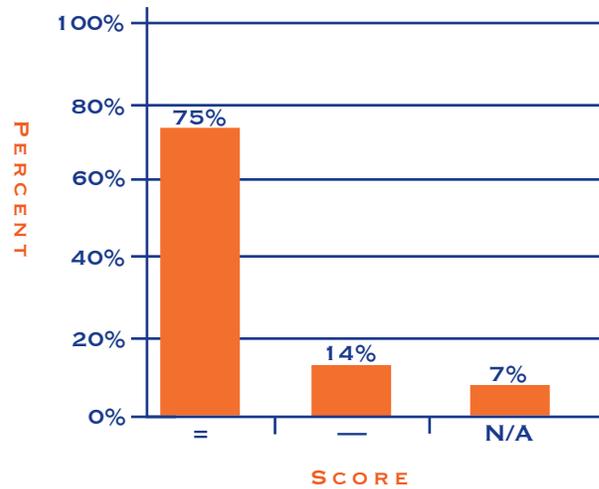
Figure 5: Percent* of Grantees by Score: Was the Project Implemented as Proposed? (N=59)



* 3 sites (5%) had scores of “?”

Although 75 percent of grantees submitted a final report to the COPS Office, 14 percent of the grantees did not. A few of the sites included in the 14 percent were simply unresponsive to requests for information, but a number of them are agencies who successfully completed their projects and submitted publications or other documentation but did not prepare a final report detailing the challenges, successes, and other requested information. Even among the sites that submitted a final report, several of the reports were rather sparse, some literally providing one-word answers in response to questions on the COPS Office report boilerplate. Again, 7 percent are not yet able to provide a final report because their projects are still ongoing. The distribution of scores is provided in Figure 6.

Figure 6: Percent* of Grantees by Score: Did the Agency Submit a Final Report? (N=59)



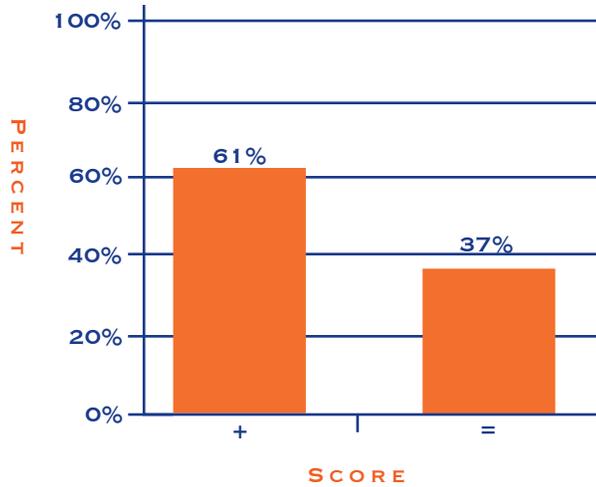
* 3 sites (5 percent) had scores of “?”

Project Integration

Just as a police department’s shift to community policing represents a fundamental change in the organization, cultural change cannot be accomplished through a one-time effort that is not integrated into the larger structure of the organization. Integration can refer to strategic planning to ensure that different information systems share the same platform and can be linked so that they can “talk” to one another and make data more readily accessible for analysis; implementing several initiatives with complementary goals; or enacting policy to weave the initiative into the institutional fabric. On this variable, we identified whether sites’ initiatives appeared to be built on existing integrity-related efforts and whether another integrity-related initiative was being implemented at the same time as the CCI project.

More than one-third (37 percent) of grantees implemented projects that were extensions of their agencies’ pursuit of effective community policing generally and more than half (61 percent) of the agencies built their CCI projects on existing integrity initiatives or strategies that they were in the process of developing. This was particularly the case with those that were implementing projects related to early intervention systems or use of force. See Figure 7.

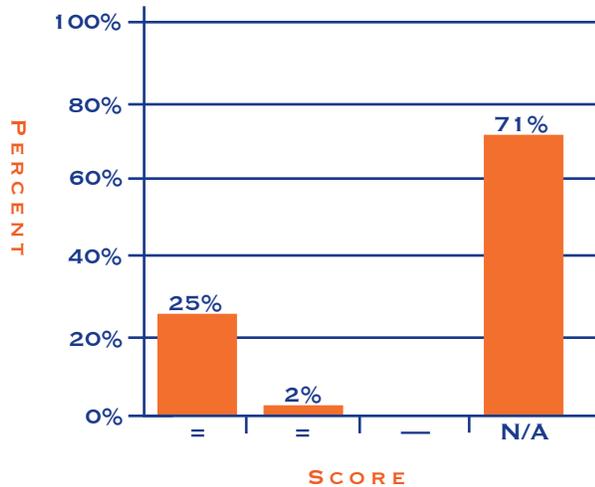
Figure 7: Percent* of Grantees by Score: Did the Project Build on Another CCI-Related Initiative to Enhance Integrity? (N=59)



* 1 site (2 percent) had a score of “?”

Twenty-five percent of sites “simultaneously” implemented at least one additional integrity-related project on top of the primary strategy for which they received CCI funding. Of these sites, almost all had directly built on existing efforts in their CCI project. Two percent tried to implement another initiative but were unsuccessful. Seventy-one percent of the grantees did not intend to engage in an additional project following the CCI project. The distribution of scores is provided in Figure 8.

Figure 8: Percent* of Grantees by Score: Was the Project Implemented in Concert or at the Same Time as Another Initiative to Enhance Integrity? (N=59)



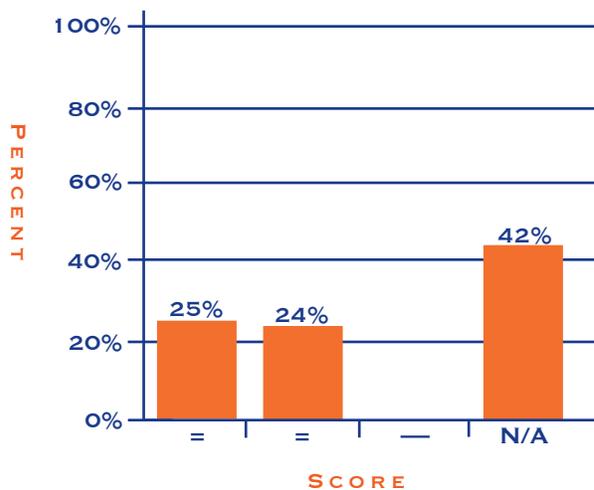
* 1 site (2 percent) had a score of “?”

In addition to measuring the proportion of agencies that implemented CCI in concert with or at the same time as another integrity initiative, the case studies in Section III provide more detailed descriptions of how a number of grantees conducted multiple integrity projects at the same time. For example, the Virginia Beach Police Department received funding under the early intervention system strategy area but also proposed and implemented leadership training that provided skills that will be useful to supervisors and managers responsible for working with officers who have crossed early identification and intervention system thresholds. Integrating these projects into existing administrative structures strongly suggests that the agency is more likely to be successful in making culture change toward integrity.

Decreasing Officer Misconduct

One of the most important goals of any initiative that addresses the integrity of the organization is to reduce the likelihood that individual officers will engage in misconduct or unethical behavior. Some types of initiatives—for example, data collection, early intervention system development, internal affairs division operations strengthening, and revision of use-of-force policy and procedure—are intended primarily to monitor or track officers' behavior. In contrast, recruiting for a diverse workforce may also help to decrease officer misconduct by demonstrating the importance of reflecting and representing the local community, but any effects would take place during a longer, more indirect process. Such efforts are as much attempts to build a positive officer culture as are monitoring or tracking initiatives. Twenty-five percent of agencies overall indicated that increased monitoring had been established, while twenty-four percent created projects that looked likely to increase monitoring. Forty-two percent of agencies did not intend to increase monitoring through their projects. The distribution of scores is provided in Figure 9.

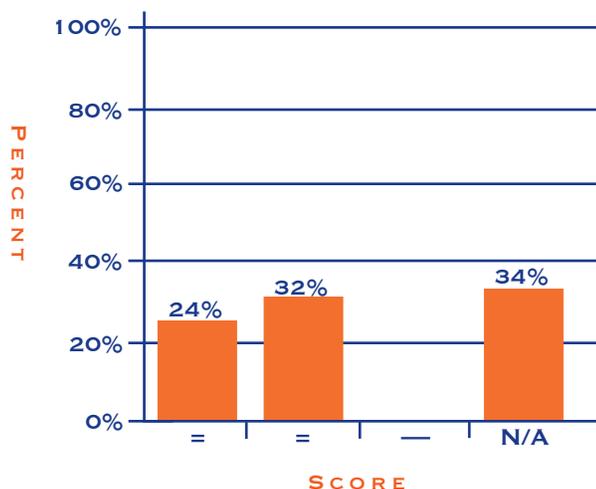
Figure 9: Percent* of Grantees by Score: Did the Project Increase Monitoring of Officer Behavior? (N=59)



* 4 sites (7 percent) had scores of “?”

Similar to officer monitoring, supervisory accountability can be expected at different times, depending on the strategy. Data collection, Early Identification and Intervention Systems (EIS), Internal Affairs Division (IAD) operations, and use of force are more likely to increase accountability more quickly. Command staff integrity training may increase accountability somewhat later because it appears to alert supervisors that they are expected to put that knowledge into practice, but does not necessarily institute policies or other measures to hold them accountable. Twenty-four percent of sites overall indicated that their project measurably increased accountability, 32 percent implemented projects that appeared likely to increase accountability, and 34 percent did not intend to increase accountability through their initiative. The distribution of scores is provided in Figure 10.

Figure 10: Percent* of Grantees by Score: Did the Project Increase Managerial/Supervisory Accountability? (N=59)



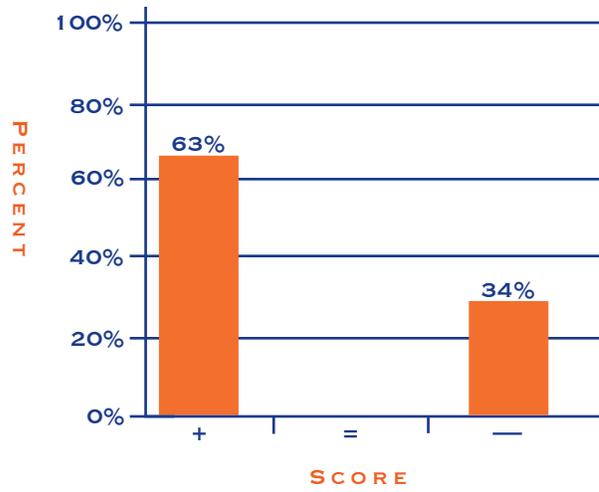
** 6 sites (10 percent) had scores of “?”*

Increasing Community Trust

Community involvement in law enforcement is a cornerstone of community policing and a necessary component of public trust. The recognition that police power is dependent on the extent to which the police can establish and maintain the respect and approval of the public dates back as far as the creation of the Metropolitan Police of London, the model for American policing, in 1829 (Champion, 2001). Significant differences in the degree of community involvement and information provided to the community can be seen across the strategies. Variation is to be expected, depending on the nature of a strategy. This variation should not generally include a

failure to include the community. Sixty-three percent of sites involved the community in their projects; 34 percent did not intend to involve the community or proposed to but did not follow through. The distribution of scores is provided in Figure 11.

Figure 11: Percent* of Grantees by Score: Did the Project Make Positive Connections with Individuals or Groups in the Community? (N=59)



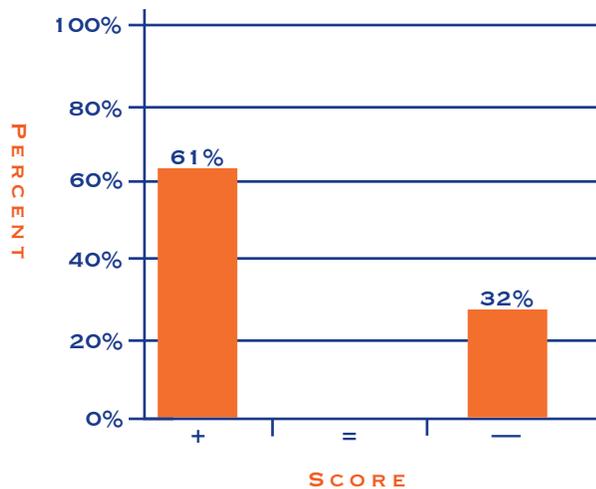
** 2 sites (3 percent) had scores of “?”*

The accountability, outreach to minority youth, and recruiting projects were by far the most likely to involve community members in fundamental ways and to provide ongoing updates or other information to the public. Many of the use-of-force sites accomplished this goal, as well. Given the intent of these strategies, it is not surprising that they focused so much on community engagement. On the other hand, almost all of the early intervention system sites, many of the command staff training sites, several of the data-collection sites, and both of the self-assessment sites made no attempt to involve the community or report on their progress to their community. The agencies implementing these types of projects with little or no community input may well have missed an important opportunity to enhance integrity. While it appears that certain strategies lend themselves more readily to community involvement, it is possible—and encouraged—in the undertaking of any strategy that has a goal of increasing organizational integrity. The projects with little community involvement may appear to be exclusively internal matters, but they address issues that are important to the public.

The accountability projects typically focused primarily on obtaining input from the public through community surveys or other methods. In one notable project described in Section III, the Jacksonville, Florida, Sheriff’s Office worked to further develop institutionalized community-law enforcement partnerships at the sector level. The Sheriff’s Advisory Councils provide opportunities for community members to meet regularly with Jacksonville Sheriff’s Office representatives and provide input into the workings of the organization.

It is perhaps understandable that those grantees collecting information on their operations or officers (e.g., EIS, data-collection projects) would be reluctant to publicize these efforts over concern that the media or contentious community leaders would request and use the results for other means. Nevertheless, agencies can find opportunities here that may not appear immediately obvious. As described in a case study in Section III, when the local media requested use-of-force data from the San Antonio Police Department (SAPD), the SAPD refused and took the matter all the way to the U.S. Supreme Court, where it ultimately lost and was mandated to make the data public. To ensure that the department would not encounter any surprises going forward, the SAPD hired a consultant to conduct an independent review of officers’ use of force and the policies and procedures in place. As a result, the police obtained a systematic examination of its department on a vital component of its operations and were able to demonstrate to the public that it takes the issues seriously, not only by conducting the study in the first place but by subsequently posting the study on its public web site. Sixty-one percent of grantees took steps to share information about their project efforts with the public, while 32 percent did not intend to do so. The distribution of scores is provided in Figure 12.

Figure 12: Percent* of Grantees by Score: Did the Project Increase Communication or Transparency about Agency Efforts to Enhance Integrity? (N=59)



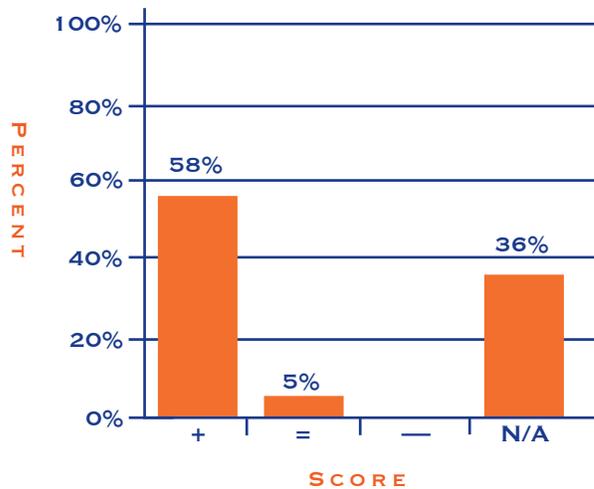
* 4 sites (7 percent) had scores of “?”

Advancement of the Profession

As discussed early in this section, American law enforcement does not operate in a professional vacuum. Agencies influence each other based on their proximity, reputation, and myriad other factors. Much of the information sharing between agencies can be an informal process through word of mouth and conversation with other police leaders. Expanding the frequency, number, and type of methods of information sharing has the potential to move the profession forward by presenting agencies with more and better choices when implementing projects in their own agencies. The caveat here is that deciding on one strategy among many potential “promising practices” requires a certain degree of sophistication in that area. Care should also be taken to obtain enough information to increase the likelihood that the chosen solution will be effective in the individual context of the agency.

Fifty-eight percent conducted site visits, communicated with members of other agencies, or looked to an association or expert in the field. Five percent conducted a literature or online search for information but did not actively engage other departments or experts. Thirty-six percent had not intended to do any research into what other agencies had done when implementing a similar strategy. The distribution of scores is provided in Figure 13.

Figure 13: Percent* of Grantees by Score: Did the Agency Look to Other Agencies with Experience Implementing a Similar Initiative? (N=59)

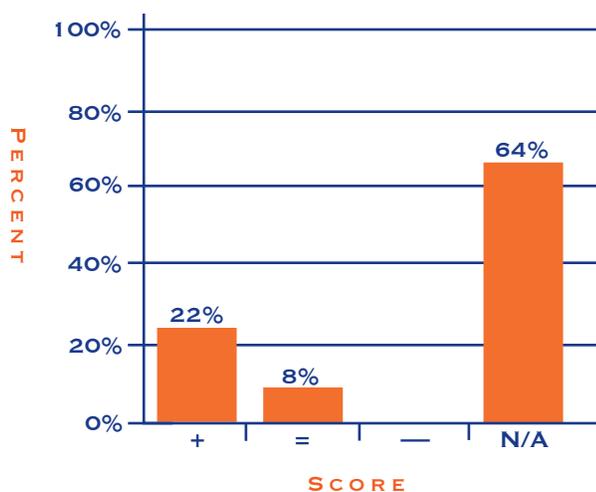


* 1 site (2 percent) had a score of “?”

Several early intervention sites visited agencies that were known for having a particularly sophisticated or successful system. Some command-staff training grantees partnered with the RCPIs, which have extensive curricula and experience in law enforcement training. Data-collection sites often contracted firms with the methodological knowledge and experience in conducting traffic-stop data collection and analysis. This is not to imply that agencies should not experiment. Possessing knowledge of others' practices can help the process to be as efficient and useful as possible. Taking advantage of expertise that would be hard to replicate internally can also establish a common standard.

In most cases, the grantees did not engage the broader field to offer information about their experiences in implementing their projects, at least during the course of their projects. Those implementing or enhancing their early intervention systems often conducted site visits to other agencies known nationally for having sophisticated systems. A few of these agencies offered others the opportunity to visit their system or presented their experience at professional conferences or meetings. Twenty-two percent of grantee agencies provided a service to other law enforcement agencies through their projects, such as free training. An additional 8 percent made presentations at professional conferences or meetings or posted information on the agency web site. Sixty-four percent did not intend to provide any information or service to the field. The distribution of scores is provided in Figure 14.

Figure 14: Percent* of Grantees by Score: Did the Agency Offer Anything to Other Law Enforcement Agencies? (N=59)



** 3 sites (5 percent) had scores of “?”*

Agencies implementing command staff integrity training or accountability initiatives were the most likely to offer information to others in the field about their initiative. The command staff training grantees typically made the training available to other agencies in the county or state by partnering with their local RCPI. Services provided by the accountability sites varied but often included training. Some notable examples of information dissemination include the King County,

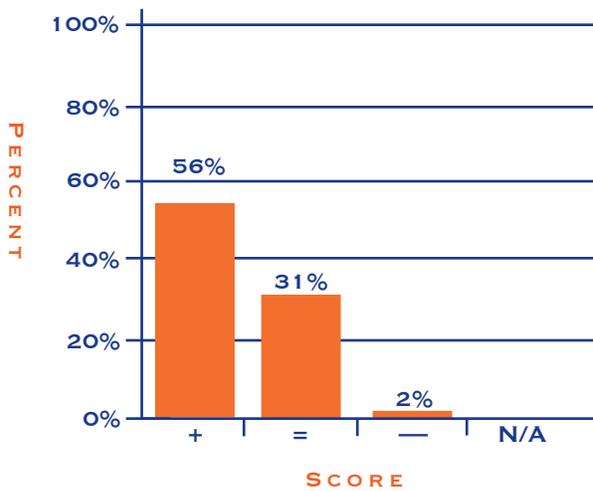
Washington, Sheriff's Office, which held a summit for community members and law enforcement on racial reconciliation and invited law enforcement agencies from across the state. In Jefferson County, Colorado, the sheriff's office worked to combine efforts for standardization of services among the 13 municipal law enforcement agencies in the county and provide ethics training for these agencies. The Austin Police Department planned to offer the Tools for Tolerance® training designed by the Simon Wiesenthal Center in Los Angeles to other departments in the region.

Project Sustainability

Sustaining an initiative is important on several levels. It is obviously necessary that it continue in order to exert an effect, but it also symbolizes the priority it represents by those in positions of power in the organization. Integrity initiatives, by their nature, take time because they are seeking to change or enhance the culture of an organization. Sustaining a project is often one important sign of commitment to an integrity principle.

Almost all of the grantees across strategy areas created policy, integrated technology and procedure, implemented ongoing training, or planned to take steps toward sustaining programming. Fifty-six percent indicated that their project has been institutionalized or is continuing, while 31 percent of the agencies implemented projects that appear likely to be sustained. Only 2 percent of agencies' projects did not appear likely to continue. This appears to be an area of greatest success of the COPS Office integrity initiative. The projects that were implemented, while sometimes taking longer than anticipated and not always providing the most detailed documentation, resulted in new agency initiatives that have been sustained after federal funds have been spent. The fact that 87 percent of the agencies appear to have sustained their integrity projects with agency resources or took steps or planned to do so is a remarkable legacy of this initiative. The distribution of scores is provided in Figure 15.

Figure 15: Percent* of Grantees by Score: Did the Project Continue after Termination of Funding? (N=59)



* 7 sites (12 percent) had scores of “?”

Each major evaluation category described helped illustrate the successes and limitations of various types of integrity projects. Much can be learned from the distributions of outcomes evident across these different types of initiatives. Despite the success of this evaluation model, it was challenging to develop workable scores to indicate whether the projects created culture change. We began the process of analysis by looking through project materials for each agency in an attempt to identify indications of whether the site planned to attempt culture change and, if so, did it create culture change or did it at least seem likely that the initiative would foster culture change in the future. After reviewing the sites' materials, it became clear that every site had in some way indicated that culture change was a goal of the initiative and, with the limited information available, almost every project seems reasonably likely to produce some culture change (if we gave the site the benefit of the doubt) or, alternatively, that almost none create culture change (if we viewed agencies' attempts more harshly). These observations led us to realize that the more important issue was that a final report cannot inform us whether culture change occurred or did not because such change takes time. Although a number of sites reported anecdotal information suggesting that change had occurred, we hesitate to confirm these accounts simply because too little time has passed since project completion, and deeper knowledge of the organization would be necessary to tackle the question of whether the agency culture had shifted for the better or did not. As a result, we do not present any scores for this question. A deeper discussion of agency attempts to create cultural change and related points are addressed in more detail in Section IV.

Cross-Strategy Analysis

The scoring process provides an opportunity to measure the success of grantees across a number of different measures critical to creating a culture of integrity. The variation across agencies illustrated in Appendix B illustrates the need to examine specific agency experiences in more depth. Despite the unique experiences of each project, a number of important conclusions can be drawn as we look across the experiences of all CCI sites.

- Integrity initiatives appear to work best when they are part of a more comprehensive approach to enhancing integrity in an organization. About two-thirds of the CCI agencies built their new program on existing initiatives already in place in the agency. Additionally, a number of other CCI agencies added additional initiatives to develop a more comprehensive approach.
- About half of the CCI agencies increased monitoring of officers as part of the initiative. These programs seem to have faced the strongest resistance from rank-and-file officers. In many of these agencies, the command staff also increased managerial and supervisory accountability as part of this additional monitoring.
- About two-thirds of the CCI agencies included the community in their integrity initiatives and about two-thirds, typically the same agencies, publicized their initiative to their local community. Community involvement was seen as a positive influence on the overall success of the initiative by the majority of agencies that included the community in their projects.
- About two-thirds of the CCI agencies asked other agencies that had implemented similar strategies for information or assistance in implementing their initiatives confirming the role of peer experience in law enforcement reform.
- Fully 87 percent of the CCI agencies sustained or planned to sustain their initiatives after the federal funding is exhausted. This may be one of the most important legacies of the COPS Office CCI initiative.

SECTION III

This section examines the grantees' experiences implementing their integrity projects. Each strategy area briefly discusses examples of activities that have created or have the potential to create cultures of integrity. In addition, six case studies offer in-depth descriptions of several creating a culture of integrity (CCI) strategy areas. The case study sites involved projects that we observed as having the following characteristics:

- The project was complete or near enough to completion that we could obtain sufficient information about project implementation.
- The project offered an innovative program model.
- The project appeared likely to result in internal and/or external culture change.

The case studies provide information that may be useful to law enforcement agencies thinking about implementing one or more of these strategies. The studies will address the following:

- Program implementation
- Agencies' accomplishments
- Challenges encountered and lessons learned
- How the initiatives resulted, or appeared likely to result, in internal and external culture change.

Case studies were selected, in part, on the strategy area. Of the 12 types of strategies funded, six—ensuring accountability to the community, early identification and intervention system (EIS) development, recruitment, use-of-force policy and training, command staff integrity training, and traffic-stop data collection—were selected by 48 of the 59 agencies. While this should not be taken to mean that the other six strategies are less important, we believe it is useful to examine the strategies that most agencies sought to implement. These sites and their strategy areas consist of the following:

1. **Ensuring Accountability to the Community.** Prior to being awarded CCI funding, the Jacksonville, Florida, Sheriff's Office already had 7 years of experience working in partnership with the community through the Sheriff's Advisory Councils (ShAdCo). CCI helped the Jacksonville Sheriff's Office enhance the ShAdCos, establish ShAdCos in neighborhoods without them, and improve the citizen complaint process.
2. **Development of Early Intervention Systems.** In Virginia Beach, the police department had implemented a number of integrity projects but was concerned that there was nothing connecting the various components within a coherent system. To improve their integrity efforts, the Virginia Beach Police Department developed an early intervention system and provided rigorous leadership training that, among other things, would provide supervisors with the skills needed to help their officers before, during, and/or after an EIS alert.

3. **Recruiting Quality Candidates from Local Communities.** The Metropolitan Nashville, Tennessee, Police Department implemented a recruitment initiative to increase the diversity and quality of its local recruitment pool. The department worked closely with targeted communities, in part by partnering with 10 area churches, to identify individuals who embody the qualities sought by the department and who might be interested in a career in law enforcement.
4. **Use-of-Force Policy and Training.** The Indianapolis, Indiana, Police Department revised its use-of-force policies, enhanced firearms training, provided leadership and integrity training, and emphasized good decision making in all areas of police work.
5. **Command Staff Integrity Training.** In partnership with the Florida Regional Community Policing Institute, the Pinellas County, Florida, Sheriff’s Office provided training on important integrity-related subjects to law enforcement agencies across the state. Training curricula were adapted to the Florida context and additional training curricula were developed by project staff.
6. **Traffic-Stop Data Collection.** The San Antonio, Texas, Police Department funded independent and comprehensive studies of two of the most serious community concerns— traffic stops and use of force. In addition to obtaining the information needed to make important changes, the police department established ongoing productive relationships with numerous leaders of various community constituencies.

Section IV provides a synthesis of Sections II and III and suggests ways to advance law enforcement’s ongoing efforts to establish and maintain cultures of integrity. We will also discuss the projects implemented under the areas of citizen complaint, Internal Affairs Division operations, mapping violations, outreach youth, civilian review board, and self-assessment strategy.

ENSURING ACCOUNTABILITY TO THE COMMUNITY

The COPS Office awarded funding to nine agencies under the accountability strategy area:

1. Austin (Texas) Police Department.
2. Cincinnati (Ohio) Police Department.
3. El Paso County (Texas) Sheriff’s Office.
4. Erie County (New York) Sheriff’s Office.
5. Jacksonville County (Florida) Sheriff’s Office.
6. Jefferson County (Colorado) Sheriff’s Department.
7. King County (Washington) Sheriff’s Office.
8. Nassau County (New York) Police Department.
9. Prince George’s County (Maryland) Police Department.

These agencies implemented projects intended to improve their relationship with the community. Many conducted surveys or focus groups to obtain feedback from the public on the public perceptions of the agency (Austin, El Paso County, Erie County, and Jefferson County). Several sites also involved community members in advisory councils or other roles that offered them a voice in helping to shape agency policy (Cincinnati, Erie County, and Nassau County). King County hosted a conference on law enforcement and racial reconciliation with community leaders from around the state. Interaction with the community occurred more within this group of grantees than in every other group except recruiting. Many projects built on existing initiatives.

For the most part, accountability projects did not attempt to increase officer monitoring or the level of supervisory accountability. The potential for achieving culture change, however, seemed high in several agencies whose projects involved numerous types of activities, instituted sustainable mechanisms, or both. At least four grantees indicated that they looked to other law enforcement agencies or experts in the field in some way to inform the development of their project, and more than half provided some service to the law enforcement community outside of their own agency. All sites for which we had information had taken steps to sustain their initiatives or provided some evidence that the projects would be continued.

Internal Integrity

As noted above, a number of community accountability projects appeared to establish conditions for internal culture change. On top of conducting focus groups to gauge community perceptions on crime and safety issues and compiling a document to educate residents on numerous aspects of policing, the Austin, Texas, Police Department sent 42 participants, including 24 community representatives in addition to department officers, to the Tools for Tolerance® training at the Simon Wiesenthal Center at the Los Angeles Museum of Tolerance. Participants were responsible for implementing customized Tools for Tolerance training in Austin with the purpose of increasing officers' awareness of racial profiling and the way their actions are often perceived by the community. The department viewed the inclusion of community members in this interactive training as a powerful way to validate the program within the Austin community and as an opportunity for a close partnership between the Austin Police Department and community. The department also intended to offer the training program to other law enforcement agencies in the region.

External Integrity—Community

The Nassau County, New York, Police Department established a Community Affairs Unit within the agency and created formal Community Councils in each of the jurisdiction's eight precincts. During the project, the department also conducted a community survey to gauge perceptions of its law enforcement services and developed a web site through which it provided information to residents about local crime, quality-of-life issues, and department activities.

External Integrity—Profession

One accountability initiative that specifically offered benefits to other area law enforcement agencies was developed in partnership with the King County, Washington, Sheriff's Office. The agency worked with the National Crime Prevention Council to hold a 2-day workshop for law enforcement and community members to discuss issues around biased policing and develop action steps to improve relations between these groups. Law enforcement agencies from across Washington State were invited. The discussions resulted in the creation of the Washington State Working Group, a multidisciplinary, multiple county coalition dedicated to eradicating the injustice, bias, and distrust that historically have undermined partnership between law enforcement and the community. To achieve the goal, the group created committees to document current law enforcement policies, practices, and cultural norms in the state and develop action plans to further the group's efforts.

CASE STUDY NO. 1: JACKSONVILLE SHERIFF’S OFFICE

Background of the Jurisdiction and Agency

Jurisdiction: City of Jacksonville/Duval County. The city and county merged in 1968.

Location: Northeastern Florida

Population:

Duval County: 861,150 (Florida Department of Law Enforcement, 2005)

Jacksonville Sheriff’s Office: 816,648 (Florida Department of Law Enforcement, 2005)

Race/Ethnicity: White: 62.5%; Black/African-American: 29.6%; Asian: 3.5%; American Indian/Native Alaskan: 0.3%; Native Hawaiian/Pacific Islander: 0.1%; some other race: 2.4%. Latino: 5.4% (U.S. Census, 2005 estimate)

Area/Density: 774 square miles/1,006 persons per square mile (U.S. Census, 2000)

Agency personnel: 1,566 sworn; 1,180 civilian (FBI, 2005)

Reported crime:

Total Duval County: 6,954 violent offenses; 46,416 property offenses (Florida Department of Law Enforcement, 2005)

Jacksonville Sheriff’s Office: 6,600 violent offenses; 43,517 property offenses (Florida Department of Law Enforcement, 2005)

Crime rates³:

Total Duval County: 8.1 violent offenses and 53.9 property offenses per 1,000 population

Jacksonville Sheriff’s Office: 8.1 violent offenses and 53.3 property offenses per 1,000 population

For 7 years prior to the Creating a Culture of Integrity program, the Jacksonville Sheriff’s Office worked in partnership with the public through Sheriff’s Advisory Councils (ShAdCo) to promote accessibility and accountability of the department to the broader community. ShAdCos are meant to be community driven and to increase communication and collaboration between the police and the citizens of a community. Currently there are 17 ShAdCos, one for each policing sector in Jacksonville.

The Grant

Although the Jacksonville Sheriff’s Office had already established a ShAdCo in each policing sector, it saw various areas where the program could be refined and enhanced. With the CCI grant, the sheriff’s office had three objectives. The first was to gather law enforcement officers and current ShAdCo members in a workshop environment to discuss improvements that could be made to their collaborative effort. Second, the sheriff’s office wanted to extend its program to include neighborhoods in the community that had yet to link with a ShAdCo group. It set out to do this by creating a marketing plan that would focus on explaining the purpose of the ShAdCo program and ensuring that the times and locations of the meetings were announced to the public. Third, to further increase the agency’s accountability to the public, the sheriff’s office established a standard requiring a written response to at least 85 percent of the complaints and concerns received. Throughout each initiative the Jacksonville Sheriff’s Office documented its steps so that it could create an organizational planner, a member handbook, and a CD with video footage to better enable other communities and agencies create their own ShAdCo groups.

3. Rates are based on Florida Department of Law Enforcement’s Statistical Analysis Center’s Uniform Crime Report population for the jurisdiction. Unless otherwise indicated, rates for the remaining case study sites are based on the 2005 UCR population figures.

Sheriff's Advisory Councils

The Jacksonville Sheriff's Office originally created the ShAdCos to increase police officer contact with the community and ensure accountability of law enforcement within the Duval County community. ShAdCos aid in creating a mutual understanding between the police and the public that serves to better the flow of information both to and from the police. Although the councils have allowed for open communication between community members and police officers, the sheriff's office sought to broaden the collaborative effort and implement a process of outreach to the communities that remained uninvolved. This was done through public service announcements broadcast on both television and the radio.

A ShAdCo's community contingent is composed of those recruited by the Jacksonville Sheriff's Office and volunteers and is meant to reflect the community that it represents. A ShAdCo coordinator functions as the direct liaison between the sheriff and each group; however, each group's zone commander runs the meetings, which are open to the public. The agency noted that it has found that groups comprising 30 to 50 members offer a sufficiently diverse outlook on a community's issues necessary to make changes and at the same time prevent the meetings from becoming arduous and counterproductive. The agency conducts a background check and review of prior records to determine an applicant's eligibility because members may become knowledgeable about privileged information in the course of their involvement in a ShAdCo.

Organizational Planner/Member Handbook

To refine and enhance the collaborative effort of the police and the community, the Jacksonville Sheriff's Office held two workshops. The ShAdCo leaders and law enforcement officers designed and developed content for both the planner and handbook concurrently. Various approaches to ShAdCos were weighed and considered in the workshops. For the organizational planner, workshop participants decided that there should be models for both residential and commercial communities. They also decided to make the organizational planner a PDF file and put it on the CD along with the video. Footage for the CD and planner were shot during these meetings. At the same time, the work group developed the text that would be incorporated into the handbook which would serve as a tool for the ShAdCo coordinator to bring uniformity to the 17 ShAdCo groups in Jacksonville. Included in the handbook are the items on which the coordinator should focus when creating and running a ShAdCo:

- Describing the benefits of participation
- Listing community resources available to help establish and/or maintain a safe environment
- Determining the structure and organization of the ShAdCo
- Marketing the ShAdCo
- Recruiting and selecting
- Establishing organizational guidelines
- Sustaining the ShAdCo
- Facilitating a ShAdCo meeting
- Taking the ShAdCo to the next level.

Marketing

The majority of the Jacksonville Sheriff's Office's time and resources were focused on implementing a two-pronged marketing plan. At the core of the plan was Space Imaging, a production company from Orlando, Florida, that won the contract. It produced a 5-minute video, two 30-second radio and television public service announcements (PSA), and a trifold brochure. The video was put on a CD along with a PDF version of the ShAdCo leader's organizational planner to ease its replication and distribution. The PSAs were distributed to local media stations, and project staff have since heard them on the radio and have seen them played on television during the afternoon and evening. At the conclusion of the grant, the release of the brochure was still pending because of the late appointment of the ShAdCo coordinator.

The second prong involved filming another video on CD documenting the roles and responsibilities of a ShAdCo. The video was intended as another way of explaining, to both the police and the community, how a ShAdCo can foster a collaborative relationship between law enforcement and the local community. It was also meant to give outside agencies an idea of what to expect when creating their own version of a ShAdCo. Half of the DVDs ordered by the sheriff's office were sent to other law enforcement agencies.

Challenges

The Jacksonville Sheriff's Office's grant project was subject to a number of delays. In addition to funding being delayed until December 2002, the department faced a complete turnover and rotation of the executive staff, with the new sheriff assuming command in July 2003. A few months into the initiative, the project director attended the FBI National Academy and was reassigned upon his return. As a result, a new project director was needed about 8 months into the grant. The turnover also limited the extent to which the collaborative decision-making process with the community partners could be documented. Encouragingly, however, the new sheriff was committed to the ShAdCo process as well as to the CCI grant and hired a full-time coordinator to oversee the ShAdCo program and facilitate the successful completion of the grant project.

Creating a Culture of Integrity

The ShAdCo program appears to be a productive way to engage the community. Although developed by the Jacksonville Sheriff's Office, the ShAdCos remain community-driven collaborations. These open forums enable the citizens to voice their concerns regarding their community and offer their ideas about how these issues can be resolved. The sheriff's office has also made it a priority to offer feedback regarding the progress of any issues that are brought up. Sustaining and enhancing the operation of these community/law enforcement partnerships, particularly the hiring of a full-time coordinator, sends a message to line officers that community input is important to the functioning of the agency.

The fact that the original ShAdCos have sustained their efforts for 7 years at this time is a strong indication that they can offer a model of involving the community to create a culture of integrity in an agency. Given the proven track record during the 7 years before CCI, the agency hopes that this model can be used as a foundation for others seeking to increase the community's confidence in the responsiveness of a department.

DEVELOPMENT OF EARLY INTERVENTION SYSTEMS

Eleven sites were awarded funding to develop an early intervention system (EIS) or to enhance the agency's existing EIS:

1. Chicago (Illinois) Police Department.
2. Fulton County (Georgia) Sheriff's Office.
3. Las Vegas (Nevada) Metropolitan Police Department.
4. Minneapolis (Minnesota) Police Department.
5. Oakland (California) Police Department.
6. Phoenix (Arizona) Police Department.
7. Salt Lake City (Utah) Police Department.
8. San Diego (California) Police Department.
9. Santa Clara County (California) Sheriff's Office.
10. Seattle (Washington) Police Department.
11. Virginia Beach (Virginia) Police Department.

The primary goal of early intervention is to improve the monitoring of, and support provided to, officers as well as to increase the level of supervisory accountability. Many of the agencies experienced delays in launching their systems and, as a result, it is difficult to determine whether the extent to which culture change actually occurred. This may depend, in part, on the degree to which line officers trust and buy into the idea of the EIS.

Ninety-one percent of the grantees did not involve the community in the development of their system, while eighty-two percent did not provide information to the public about their efforts. Often, agencies feared that the information may be misused, eroding line officers' morale. In one exception, Fulton County publicized the agency's progress on its project's development during the regular monthly community meetings. Phoenix included a community member on its EIS board. Many of the agencies included site visits to one or more agencies that had already had an EIS, especially agencies known to have a particularly sophisticated and successful system in their planning for the new system. Several grantees voiced a willingness to serve as a demonstration site once they were up and running.

Internal Integrity

As will be discussed in more detail in the accountability case study, the Virginia Beach Police Department supplemented the implementation of its early intervention system with leadership training. When a supervisor is alerted by the EIS that an officer may need intervention, that supervisor has to be capable of carrying out the next steps in the process effectively, which can include listening, mentoring, and developing intervention strategies, if warranted. Using the West Point third-year cadet curriculum, the police department is providing its supervisors with a vocabulary and framework for leadership. Effective leadership by line officers' supervisors has always been important. With the increased need to address officers' behavior at earlier stages, ensuring that supervisors have the necessary skills is even more critical.

External Integrity—Community

As a way to guide the development of the agency's EIS, the Oakland, California, Police Department conducted a customer service survey of the community to gauge public perceptions of the department's community policing efforts. The Phoenix Police Department's early EIS oversight board, which meets quarterly, includes a community representative as one of its nine members. The department's web site, however, appears to convey the sentiments of other agencies in saying "General public awareness of this program is not a priority to the goals of EIS. This process is a supervisory tool for employee success."

External Integrity—Profession

The Seattle Police Department stated that it would like to be considered as a possible demonstration site by the COPS Office and had begun developing demonstration plans on an informal basis. The Phoenix Police Department has hosted hundreds of police officials to view its system, which is regarded as one of the most advanced in the United States.

CASE STUDY NO. 2: VIRGINIA BEACH POLICE DEPARTMENT

Background of the Jurisdiction and Agency

Jurisdiction: City of Virginia Beach

Location: Southeastern Virginia

Population: 446,448 (FBI, 2005)

Race/Ethnicity: White: 70.2%; Black/African-American: 19.0%; Asian: 5.3%; American Indian/Native Alaskan: 0.3%; Native Hawaiian/Pacific Islander: 0.2%; some other race: 1.4%. Latino: 4.8% (U.S. Census, 2005 estimate)

Area/Density: 248 square miles/1,713 persons per square mile (U.S. Census, 2000)

Agency personnel: 786 sworn; 165 civilian (FBI, 2005)

Reported crime: 1,140 violent offenses; 13,342 property offenses (FBI, 2005)

Crime rates: 2.6 violent offenses and 29.9 property offenses per 1,000 population

Prior to being awarded CCI grant funding, the Virginia Beach Police Department made it a priority to develop ongoing training to provide a foundation of ethics for all members of the department and to promote a high ethical standard within the organizational culture. To these ends, the department developed a basic ethics training course in 1999. The 8-hour class, provided to all members of the department, both sworn and civilian, emphasized the importance of ethics in all aspects of the organization. In 2001, the department developed a second course that focused on five sets of values used to make decisions, namely, personal, professional, organizational, legal, and public interest. The class, given to sworn personnel, emphasized the idea that officers' behavior affects the entire organization and the law enforcement profession, not just themselves.

The Grant

When agency leadership changed during 2001 and 2002, the new administration was concerned that it had many integrity training components in the curriculum but no clear system integrating integrity and leadership into the training. The administration decided to combine additional training with an early warning system to help identify and work with personnel who behave in ways that could have a negative impact on both the organization and the community. The department saw the CCI grant “as an opportunity to get ahead of any potential problems and emphasize to our members and to the community that integrity is more than a high priority; it is an essential part of the structure of the organization” (final report).

Early Intervention System

As an agency accredited by the Commission on Accreditation for Law Enforcement Agencies, the Virginia Beach Police Department had an early intervention system (EIS) prior to the grant, but it was a manual system in which internal affairs investigators would look at an officer’s previous history of complaints and send the information to the precinct commander. This did not allow comparisons of officers across various indicators, limiting its effectiveness in proactively addressing officers’ behavior. Another challenge to the manual system was that the Virginia Beach officers can bid on a new shift every 6 months, making it difficult for supervisors to get to know their officers. The department recognized the need for a system that makes an officer’s information easily accessible to supervisors. The system would also provide the data needed to give feedback to their officers regarding issues on which they are being trained.

When it was decided to implement a new EIS, a lieutenant in the Professional Standards Office and a systems support employee visited the Phoenix Police Department to see that agency’s EIS. Following the visit, the Virginia Beach Police Department established an EIS committee composed of two or three representatives from each precinct and investigative division, several supervisors at the rank of sergeant, a member of the union (which does not have collective bargaining power in Virginia, a right-to-work state), several civilian employees of the department, and two members of the Information Technology unit. The group brainstormed the types of behaviors that should be tracked and what systems currently contained such information. Privacy and the ability to see one’s own profile were identified as concerns early on. The committee did not establish formulas for thresholds but did attribute different points to various types of behavior.

The grant allowed Virginia Beach to purchase the off-the-shelf IAPro system. After the system was installed, though, the department realized that IAPro could count only thresholds on use-of-force incidents, police vehicle pursuits, citizen and internal complaints, and police shootings. Moreover, it could not interface with other sources of information such as the department’s records management system or computer-aided dispatch (CAD) system. The process of migrating data into the IAPro system also proved more difficult than anticipated because the data required considerable cleaning in the new system. Initially, the vendor did not recognize that IAPro used slightly different fields and values than the department’s systems. Ensuring that the data were correct was a time-consuming, but necessary, process because the department knew that incorrect alerts would quickly turn officers against the system.

Many officers were initially wary of the system, thinking that “Big Brother” was watching them. To sell the system to their fellow officers, members of the EIS committee were instrumental in the decision to include positive as well as negative behavioral indicators. In this regard, the department had an early success. When an officer was identified as having exceeded the system’s threshold for use-of-force reports, further inquiry by his supervisor revealed that the officer worked in a high-activity area and had applied force appropriately. Instead of being recommended for an intervention, the officer was recognized by the department for his good work, and his supervisor recognized that an outstanding officer was working in the squad.

Data entry of use-of-force incidents was being done by a clerk in the Professional Standards Office. The department used to have a 3-to-4-month backlog, but after putting a priority on entering these forms, much of these data have been entered, resulting in more alerts being generated by late 2005. Almost all alerts appear to be the result of this delayed data entry. Of 41 alerts generated for 31 officers, one resulted in an intervention, another in a commendation. Others involved something more informal, such as counseling, coaching, and the development of work performance plans. Presently, the EIS does not allow for differential access to the system; the Professional Standards Office has access to the EIS, but individual officers do not.

Although moving to the IAPro system was a step in the right direction, the department realized that the system did not offer the comprehensive tool the department needed. A subcommittee was formed to put together a request for proposal for a new EIS to complement IAPro. This project is being conducted with subsequent funding under the COPS Office Enhancing a Culture of Integrity initiative.

The department wants an EIS that will interface with seven agency information systems, including the employee training module (AceTrack), CAD system, IAPro, Police Automated Management System (PAMS), Police Records Management System (PISTOL), Police Officer Assigned Dates (POAD), and liability and risk-management system. Virginia Beach wants the new system to manage the EIS assessment and intervention process, work flow, points of accountability within the process, reports, and queries to examine patterns in officer behavior and comparisons of units, data presentation, and access administration (e.g., system security and auditing).

The department related the need for a more sophisticated system to its belief that determining when to intervene after an alert is generated is similar to a doctor making a diagnosis for a patient. Having a system that provides better information on more indicators of importance offers a more complete picture from which to make decisions. The best a computer can do, however, is provide information on various factors; it is the role of a professional to determine what the totality of the evidence signifies and whether and what intervention is appropriate. The most important component is supervisors’ knowledge of, and attention to, their personnel. As Walker, Milligan, and Berke (2006) note in their EIS guide for front-line supervisors, experienced commanders at many agencies said that good supervisors will use EIS as an even more proactive tool; that is, the supervisors should become “early early intervention systems,” catching problems before they even reach the EIS.⁴

4. For more detailed information on supervisory issues concerning EIS, we recommend this guide by Walker and his colleagues: *Strategies for Intervening with Officers through Early Intervention Systems: A Guide for Front-Line Supervisors* can be accessed through the COPS Office web site at <http://www.cops.usdoj.gov/RIC/ResourceDetail.aspx?RID=197>.

Advanced Leadership Training

To provide a system of leadership training, the department began using the curriculum used at West Point for third-year cadets. The program possesses a unique vocabulary and uses a leadership/followership model that is now used in the Virginia Beach Police Department academy and during in-service training at the department.

The West Point curriculum is provided to officers at the level of sergeant, lieutenant, or captain during a 16-week period for 8 hours a day. West Point program participants must prepare presentations, take exams, and work in small groups. The course involves lessons on management and organizational theory, and participants learn to develop work and action plans. Officers must achieve an 80 percent score to pass. Recruits get a small portion of the training during the academy but do not receive the full course until they advance to managerial positions. The West Point program has also been offered to other agencies in the city.

To promote self-reflection during and after the training, students complete the Leadership Practices Inventory (LPI), which asks respondents to indicate the extent to which they exemplify five practices in a leadership model, just before beginning the curriculum. The responses are discussed the first day of class, and the LPI is subsequently administered on a yearly basis to offer continued feedback.

In addition to the West Point curriculum, the Virginia Beach Police Department used several other activities to address leadership issues within the department. The department created a speakers series, bringing in individuals to deal with issues affecting law enforcement in several areas of concern, including emotional survival, how to promote a positive and healthy environment, and organizational cultures. The series emphasized looking at the department as a community member might. In addition to being offered to field training officers, first-line supervisors, and command officers, the department made the events available to personnel from local, state, and federal agencies in the area, as well as line officers and community members. The following courses were offered to the personnel:

- Building a Belief System Built on Values
- Bullet-Proof Mind
- Leadership Development Foundations
- Challenging the Organizational Culture
- Emotional Survival for Law Enforcement
- Developing Productive Relationships
- Managing Employee Discipline
- Managing Bias and Harassment in the Workplace.

Organizational Assessments

The department also conducted several organizational assessments, including the Campbell Organizational Survey (COS) to find out what employees think are major problems in the department. According to the Center for Creative Leadership, the organization that created the survey, the COS “Assesses an organization’s climate, offering insights into areas that need improvement and those that should be celebrated. It can be used with all employees or members of a targeted work group and allows the organization to survey employees on their satisfaction in such areas as feedback, top leadership, and organizational planning.”⁵

5. www.ccl.org/leadership/assessments/COSOverview.aspx?pageID=42

The results did not always reflect what supervisors expected and prompted some important self-reflection. Responses led to the establishment of four Department Action Teams to address the issues identified: Leadership, Quality, Planning, and Employee Development and Support.

A majority of sworn and civilian women, who comprise 11 percent of the Virginia Beach Police Department (the national average), provided input to the *2004 Survey of Women Officers*. Their responses highlighted three major issues: child care, mentoring, and the need for a departmental liaison with officers or an ombudsperson. It was quickly recognized that these issues are not solely women's issues; they affect many individuals in the department, irrespective of gender.

Although no formal evaluation was conducted, the Virginia Beach Police Department notes that it has recognized positive change occurring in the department. Through its annual analysis of complaints, listening to officers discussing work plans and using language from the trainings, observing officers making different kinds of inquiries into problems based on their training, and receiving feedback from officers on the training, it is clear that the initiatives have made an impact on the department's culture.

Creating a Culture of Integrity

The Virginia Beach police recognize that effecting culture change is a long-term, multifaceted process that takes a substantial investment of time and energy. One of the most notable features of the Virginia Beach Police Department initiative is how the leadership training may contribute to the success of its EIS. Not only will the EIS help identify problem behavior before it escalates, but the training on leadership and critical thinking will help supervisors make good diagnoses and implement productive remedies.

The departmental surveys provided benefits on several levels. First, conducting surveys of members of the department offered a way to make respondents see that their opinions are important to the agency's operation. It also allowed the department to collect baseline data to which they can compare future data when implementing change strategies. Finally, the information provided in these surveys identified some department-wide issues that the department should address. For example, feedback provided on the *Survey of Women Officers* identified concerns that spanned the entire department, not just those of female officers. These responses resulted in the development of proposals for a departmental mentoring program and an ombudsperson program. The Leadership Speaker Series offered a valuable educational event not only to those in leadership positions in the department but to supervisors in other area government agencies, line officers in the department, and community members.

By addressing many different but complementary areas, the Virginia Beach Police Department is addressing issues of integrity throughout the department as a part of its overall mission, not as a stand-alone initiative. And by offering educational resources like the Leadership Speaker Series not only to those individuals in departmental leadership positions but to supervisors in other government agencies, line officers, and community members, the department is helping to expand the reach of its organization integrity efforts.

RECRUITING QUALITY PERSONNEL FROM LOCAL COMMUNITIES

Nine sites implemented recruiting strategies:

1. Bergen County (New Jersey) Sheriff's Office.
2. Franklin County (Ohio) Sheriff's Office.
3. Harris County (Texas) Sheriff's Office.
4. Hillsborough County (Florida) Sheriff's Office.
5. Jefferson County (Alabama) Sheriff's Department.
6. Metropolitan Nashville (Tennessee) Police Department.
7. Norfolk County (Massachusetts) Sheriff's Office.
8. Palm Beach (Florida) Sheriff's Office.
9. Riverside County (California) Sheriff's Department.

The agencies engaged the community on multiple levels with the purpose of identifying a diverse and highly qualified applicant pool and workforce. Grantees created or enhanced their web presence to attract the younger demographic, streamlined the application process, targeted efforts toward specific segments of the population underrepresented in the agency, engaged the community in new and creative ways, and conducted other outreach strategies.

All grantees under this strategy area made significant efforts to connect with the public and to provide information to the community. Recruitment grantees' strategies tended not to focus on officer monitoring or the degree of supervisory accountability, and grantee materials did not mention any initiatives to publicize their efforts among other law enforcement agencies. All projects have improved the agency's recruitment efforts, with several appearing to have at least the potential for creating internal culture change. Although recruitment initiatives take time to demonstrate their effect on the agency, it is often difficult to determine their success, and several agencies' strategies offer reasons to be optimistic.

Internal Integrity

One outcome of Hillsborough's recruitment initiative strongly suggests the potential for internal culture change. Field training officers reported that graduates of the first class of scholarship recipients showed a greater commitment to community service and exceeded the minimum employment requirements for education level and other background factors.

External Integrity—Community

Not only did the Hillsborough County, Florida, Sheriff's Office strive to diversify its applicant pool, it involved community stakeholders in the process in a fundamental way, building positive relationships. The agency asked community organizations to identify quality individuals who might be interested in a career in law enforcement. The agency awarded scholarships to 20 individuals to cover the cost of academy tuition and exams and provided them with a \$5,000 stipend to support them during the 5 months of academy training.

The Bergen County, New Jersey, Sheriff's Office created a Youth Awareness Program geared primarily to high school students for the purpose of explaining the specific functions of the agency and law enforcement more generally. In addition to classroom lecture components, participants toured the agency, courthouse, and jail where staff discussed the Bergen County Sheriff's Office as a career option. Ten summer interns were hired to assist agency staff while learning about various police functions, such as fingerprinting and report writing. Through this program, the sheriff's office increased its contact with the schools and the next generation of potential applicants.

External Integrity—Profession

Few grantees reported looking to other agencies for ideas. The Norfolk County, Massachusetts, Sheriff's Office hired a consultant with expertise in personnel and recruiting, and the Internal Affairs unit of the Jefferson County, Alabama, Sheriff's Office interviewed personnel in agencies advertising for recruits in popular law enforcement journals. Few recruitment grantees appear to have shared information or strategies with other agencies in the field.

CASE STUDY NO. 3: METROPOLITAN NASHVILLE POLICE DEPARTMENT

Background of the Jurisdiction and Agency

Jurisdiction: City of Nashville/Davidson County

Location: North central Tennessee

Population: 557,034 (FBI, 2005)

Race/Ethnicity: White: 64.1%; Black/African-American: 28.6%; Asian: 3.2%; American Indian/Native Alaskan: 0.3%; Native Hawaiian/Pacific Islander: 0.0%; some other race: 12.5%. Latino: 7.2% (U.S. Census, 2005 estimate)

Area/Density: 473 square miles/1,153 persons per square mile (U.S. Census, 2000)

Agency personnel: 1,244 sworn; 302 civilian (FBI, 2005)

Reported crime: 8,974 violent offenses; 35,796 property offenses (FBI, 2005)

Crime rates: 16.1 violent offenses and 64.3 property offenses per 1,000 population

In 2001, the Metropolitan Nashville Police Department had to contend with processing more than 900 employment applications with a recruitment staff of two sworn officers and one civilian employee. Having recently increased the base salary for officers to a level higher than many neighboring jurisdictions, the department was receiving a high number of applications. Most of the applicants were from other agencies that paid lower salaries instead of from within the jurisdiction and did not always reflect the diversity of metro residents. Although the police department was striving to recruit local applicants and maintain a workforce reflective of the community, little funding remained for the department to seek out local applicants specifically. Given the resources necessary to conduct background investigations and other screening processes, the department wanted to maximize its efforts aimed at attaining a diverse local workforce.

The Grant

With Creating a Culture of Integrity grant funding, the department hoped to increase the number of qualified local applicants by 10 percent over previous academy applications. The desired increase applied to applicants overall, but primary efforts targeted members of the African-American and Latino communities. The department’s strategy consisted of five main elements:

1. Have the Recruitment Unit identify 10 area churches, especially those with large minority congregations, with whom to partner to identify possible candidates. These partnerships would also create and enhance bonds between the department and the community.
2. Translate the recruitment brochure into Spanish and make it available in the rapidly increasing Latino/Hispanic communities.
3. Give School Resource Officers (SRO) updated and newly designed recruitment brochures and signs for metro area high schools. Officers would provide information and guidance on various programs and educational opportunities that will help prepare students for a career in law enforcement after graduating from high school.
4. Partner with local public access television to develop a 10-minute recruitment video of professional quality that will focus on the application and testing processes and academy training. This video (and 30-second “grabber ad”) would be aired on these local stations and used by the SROs in the high schools.
5. Display recruitment advertising banners on buses, which reach surrounding counties as well as heavily traveled areas of the city. A committee would be established to develop a campaign message and accompanying graphics and text.

To implement these objectives, the Metropolitan Nashville Police Department established a steering committee composed of constituencies including the city’s Human Relations Commission, Human Resources Department, Metro Refugee Services, Interdenominational Minister’s Fellowship, and Hispanic Chamber of Commerce. The department’s Behavioral Health Services Division, Office of Professional Accountability, Fraternal Order of Police, and the Black Police Officers Association also participated, as did several sworn officers.

Subcommittees on research and advertising were also created. The research subcommittee was composed of the project coordinator, the police department’s Planning Division, Recruitment Section, Training Academy, Office of Professional Accountability, and Metro Refugee Services. It was headed by the manager of the Behavioral Services Division. Members were also recruited from local community constituencies, including the Latino/Hispanic and Kurdish communities, Black churches, Greater Nashville Black Chamber of Commerce, Nashville Area Hispanic Chamber of Commerce, NAACP, Nashville Urban League, and Tennessee State University.

Developing the Advertising Campaign

The steering committee conducted focus groups with the research subcommittee, whose members included a diverse group of area residents, to look at community perceptions of the police department, its officers, knowledge of an officer's job, and the process of becoming a trainee and completing the training. Following the discussions, the steering committee developed a community survey based on these themes. The head of the Behavioral Health Services Division, a Ph.D. from Tennessee State University, and a staff member of the Hispanic newspaper *La Noticia* prepared a short questionnaire, paying particular attention to its readability for Latino/Hispanic residents; it was also translated into Spanish.

The survey asked for demographic data, along with information on the number and types of respondents' contacts with Metropolitan Nashville Police Department officers during the previous year, how they felt they were treated by the officer, and through what media they had seen or heard the police department's recruitment advertisements. Respondents were also encouraged to provide comments on how the department could improve recruitment from their community. Surveys were distributed at the department's training academy, a recruitment open house, community fairs and seminars, and Tennessee State University.

Of the 242 respondents, 15 percent were recent police trainees or attendees of the open house and 85 percent were other Nashville community residents. Seventy-six percent of respondents identified themselves as Black, 15 percent indicated they were White, and less than 2 percent were Asian, American Indian/Alaskan, or Hawaiian Pacific Islanders. Two percent identified themselves as being Hispanic and less than one percent were of Kurdish heritage. Forty-two percent were male and 55 percent were female. The major observations gleaned from the survey responses included the following:

- Slightly more than half (55 percent) believed both that their family would support them in becoming a Metropolitan Nashville Police Department officer and that being an officer was an enjoyable and well-respected profession. Only 38 percent indicated they would encourage their family and friends to become an officer, and forty-six percent perceived that financial rewards existed in working for the police department.
- Forty percent perceived a career as a police officer as too dangerous for themselves or their family.
- Large majorities of respondents voiced support for increasing the diversity of the department, for officers learning more about various cultural groups represented in the community, and that officers should enjoy meeting with residents. Sixty-six percent agreed that women should consider becoming police officers.

Responses to the survey provided information on which to base the advertising campaign. The survey researchers made several recommendations emphasizing inclusion. Advertisements should also focus on community engagement as a problem-solving activity as much as an enforcement activity; emphasize mentoring and field training in addition to academy training; and offer testimonials from officers, particularly those from racial or ethnic minority communities, about the rewards of being a police officer. The researchers also suggested increasing advertising on the radio and Internet, targeting students and others in these communities.

Implementing the Advertising Campaign

The advertising subcommittee contracted several vendors to develop the marketing campaign. An advertising consultant provided the steering committee with prototypes, and a local sign production company was hired to display the ads on billboards in the county. These ads change every 12 months and are designed with corresponding “wraps ads” that are displayed on city buses. The advertising agency that produced the billboards covered much of the cost, charging only for the production of the signs, not for displaying them. In creating the billboard images that would follow the survey recommendations, the steering committee decided on images of regular community members dressed in Nashville police uniforms so that metro residents could see themselves in the role of the police.

To make it easier for applicants to use the department’s recruitment web site, ease of navigation and content were improved. The department’s research found that people want to be part of an organization that employs people like them and, consequently, it made an effort to include biographies and photos of women and minority officers in the department. The photos and biographies are rotated every few months. The web site, as well as other recruiting materials, was also translated into Spanish by the Tennessee Foreign Language Institute to make the recruitment campaign more visible to the Spanish-speaking community and to increase the recruitment of bilingual individuals. The department has an agreement with a local university to include the department’s web page on the school’s career development site.

The recruitment video was produced by the metro government’s public services project television production unit at no cost to the project. In it, a diverse group of Metropolitan Nashville officers give testimonials about their reasons for joining the department and their experiences. Made with attention to survey recommendations, information on mentoring balanced that pertaining to academy training. The department also purchased “customer incentives” with the department logo, such as pens, key chains, stadium cups, stress balls, travel mugs, and embossed portfolios, to give to people who attended recruitment and community events where the video was shown.

The department achieved its goal of identifying 10 local churches with whom to partner to identify individuals who would be good candidates for employment. Leadership of these churches worked with the police to distribute recruiting materials, which were also translated into Spanish. Ads placed in *The Christian Classifieds* of Middle Tennessee generated numerous calls of interest to the Recruitment Unit.

School resource officers received the new recruitment materials to distribute among the students. In addition, the Recruitment Unit continues to attend career days at elementary and middle schools to familiarize students with police officers from an early age. The department recognized that, although these activities are long-term strategies that won’t show immediate benefits, they are worthwhile efforts.

Challenges

Several occurrences presented challenges for the department. Delays in receiving grant funding required the Metropolitan Nashville Police Department to request an extension until June 2004. Additionally, changes in personnel slowed implementation of the project.

The goal of achieving a 10 percent increase in qualified local applicants was not achieved because of a number of events that occurred after the department was awarded the grant. One challenge was the change in the frequency of academy classes being offered. Between 1992 and 2002, the department held an academy class every 6 months; but no recruit classes were held from March 2003 through September 2004, making comparisons to earlier periods more difficult.

More daunting was the budget shortfall that occurred after the grant had been awarded. In 2004, the department was required to submit budgets with 10 percent and 15 percent reductions in spending. Since almost 90 percent of the department's budget is allocated to salary and benefits, 238 positions were eventually eliminated. Not surprisingly, the news media, as well as career fairs participants, questioned how the department could be conducting a recruitment campaign in the face of this shortfall. Although the department explained that the shortfall had not been anticipated and that maintaining a current applicant pool was necessary, this likely contributed to a decline in applications.

Creating a Culture of Integrity

The Metropolitan Nashville Police Department conducted a multifaceted recruitment campaign that engaged numerous community groups. In addition to discussions among the members of the diverse steering and subcommittees, the recruitment campaign messages were based on survey responses from the community itself.

Although the department experienced significant challenges that limited the extent to which it could achieve its proposed goal, many benefits resulted. In particular, through steering committee development the department fostered new partnerships with leaders in the Hispanic community that did not exist beforehand. The department is continuing to develop these ongoing relationships. Dialog was also established with the Kurdish community and numerous other community groups who now have personal contacts within the department. Outreach efforts to the faith community and the updating of recruitment materials also send the message that the department is actively courting a diverse applicant pool. These efforts should lead to improved standing among residents of the metro region and build the agency's external integrity.

It should also be remembered that any changes in agency demographics and culture stemming from recruitment campaigns typically are achieved through sustained efforts over the longer term. It may be necessary to wait to see if the recruitment of diverse candidate pools increases as the financial challenges facing the city are overcome.

USE-OF-FORCE POLICY AND TRAINING

The COPS Office awarded funding to seven agencies to address use-of-force policy and training:

1. Baltimore (Maryland) Police Department.
2. Boston (Massachusetts) Police Department.
3. Broward County (Florida) Sheriff's Office.
4. Denver (Colorado) Police Department.
5. Indianapolis (Indiana) Police Department.
6. Los Angeles County (California) Sheriff's Department.
7. New Orleans (Louisiana) Police Department.

Typically, all use-of-force policy and training initiatives were built on earlier efforts. The grantees addressed much of their effort toward raising the level of training and monitoring of officer behavior and of supervisory accountability for subordinate personnel. Grantees in this group, more than most agencies implementing other strategies, explicitly targeted their efforts toward changing the organizational culture. The norms and expectations around officers' application of physical coercion constitute a powerful cultural force in law enforcement agencies. In almost all of the jurisdictions for which information was available, the community was invited to provide input through focus groups, town hall meetings, or surveys.

Internal Integrity

As will be discussed in more detail in this section's case study, perhaps the most promising method for using a use-of-force initiative to further culture change in the area of integrity was employed by the Indianapolis Police Department. The idea of good decision-making pervaded the agency. The Indianapolis Police Department provided many complementary skills to train their officers to use force appropriately and created policies that steered officer behavior in the right direction. Interactive firearms training systems, which the Indianapolis and Denver police use, appear to help promote this mode of thinking.

External Integrity—Community

The Los Angeles County Sheriff's Department hosted community town hall meetings to discuss use-of-force issues with the public. Department representatives demonstrated the numerous legal and procedural options that law enforcement officers have when applying force. Through these meetings, the department hoped to educate the community about how use of force is governed and how officer discretion is constrained.

External Integrity—Profession

The Broward County, Florida, Sheriff’s Office contracted with the Police Executive Research Forum (PERF), one of the most respected policing research organizations, to review the agency’s policies and procedures on use of force. PERF produced a comprehensive report that included a set of recommendations on the use-of-force issues related to components of policy development, hiring, training, field supervision, review and accountability, and internal affairs. Working with an organization like PERF promotes the growing trend of law enforcement agencies embracing nationally recognized best practices. Within the broad range of police agencies in the U.S., the community of law enforcement is increasingly recognizing and using the successes of other agencies as models.

CASE STUDY NO. 4: INDIANAPOLIS POLICE DEPARTMENT

Background of the Jurisdiction and Agency

Jurisdiction: City of Indianapolis

Location: Central Indiana

Population: 800,304 (FBI, 2005)

Race/Ethnicity: White: 66.3%; Black/African-American: 25.5%; Asian: 1.6%; American Indian/Native Alaskan: 0.3%; Native Hawaiian/Pacific Islander: 0.0%; some other race: 3.8%. Latino: 6.2% (U.S. Census, 2005 estimate)

Area/Density: 361 square miles/2,163 persons per square mile (U.S. Census, 2000)

Agency personnel: 1,603 sworn; 1,210 civilian (FBI, 2005)

Reported crime: 7,948 violent offenses; 50,081 property offenses (FBI, 2005)

Crime rates: 9.9 violent offenses and 62.6 property offenses per 1,000 population

Over the years, the Indianapolis Police Department has obtained Department of Justice funding for numerous initiatives, including Weed and Seed funding for six neighborhoods and COPS Office funding for additional officers and programs. The police department has been incorporating community policing into the agency, engaging the community at District Task Force meetings and through a policy requiring all sworn and civilian members of the department to attend at least one neighborhood meeting per year. Prior to the grant, the department also made efforts toward building integrity, including the creation of a citizen complaint board and review process, improvement of recruiting and hiring practices to increase the diversity of the department and reduce racial profiling, and collaboration with community-based youth programs to integrate Police Athletic League programming.

The Grant

The Indianapolis Police Department has a history of working toward greater accountability, including an increasingly productive relationship between the department and the Citizen Police Complaint Board. Despite many positive efforts made around the time the department applied for Creating a Culture of Integrity (CCI) funding, by the time the department received funding,

it was the subject of several investigations related to use of force and pursuit. One event that occurred a few months before submitting the funding application was a crash that killed a 9-year-old boy and his mother by a suspect fleeing a traffic ticket. The department reviewed its policies and procedures governing use of force and high-speed pursuits. The CCI grant offered an opportunity to revise its general orders and implement further change.

Initially, the goals of the grant project focused on creating a system of consequences and retraining for officers who behaved inappropriately. A team of senior Indianapolis Police Department officers, including commanders of training, personnel, and operations, and the Citizen Police Complaint Board, developed a strategy to enhance training on use of force. The proposal focused primarily on remedial and punitive measures (e.g., a peer mediation team and impact panel) to address negative officer behavior. With the hiring of a new chief, the focus changed substantially. The incoming chief had a substantially different vision of how to use CCI funding and he refocused the project to promote positive behavior rather than prevent problems. Project staff explained that the chief believed that if officers can be reached on the front end, there will be fewer problems later. As a result, the department focused its efforts on three main areas:

1. Revising departmental use-of-force and pursuit policies.
2. Providing training on decision-making about firearms and use of force.
3. Providing training on leadership and integrity.

Updating Policies on Use of Force and Pursuit

With the grant opportunity and previous federal investigations, the department had a dual impetus to review its policies and institute new ones. Two major endeavors were the revision of the department's use-of-force continuum and establishment of a stricter pursuit policy. In revising the Resistance Control Continuum, one important step was the inclusion of tasers, which were being carried by an increasing number of officers in the department. From a management perspective, tasers are a useful tool not only in their capacity as less-than-lethal options but in the ability to track when and how often they are discharged. Operationally, officers have found that even the threat of using a taser is often sufficient motivation for offenders to change their behavior. According to the Indianapolis Police Department, officers know and apply the continuum, which is indicated by officers' use of the terminology in conversations with supervisors.

Changes in the pursuit policy incorporated an enhanced role for supervisors, providing concrete ways to encourage good decision-making by officers in the field. These new policies are part of the overall comprehensive approach to address use-of-force issues by trying to reduce unnecessary and potentially dangerous pursuits. In general, the department encourages officers to call for assistance rather than try to handle a situation on their own. Assigning supervisors the responsibility for monitoring vehicle pursuits provides an incentive to officers to stop a pursuit safely rather than allowing the pursuit to escalate. In addition, officers and supervisors must complete a comprehensive report following a pursuit. Each report is reviewed by the chain of command, eventually reaching the deputy chief, to determine whether a review board hearing is warranted. The review board, composed of the training commander, a representative from Internal Affairs, a peer officer, and a lieutenant from the field, can recommend discipline for pursuits deemed inappropriate.

Firearms and Use-of-Force Training

The Indianapolis Police Department focuses its use-of-force training on good decision-making. Trainings on use of firearms and force are geared toward de-escalating situations and learning the continuum of force so that the minimum amount is needed when physical interaction is required. Toward this end, the department acquired an upgrade of its firearms training simulator. The Firearms Automated Training System (FATS) is an interactive computerized tool that offers a relatively realistic experience. Officers engage live-action scenarios projected on a large screen that registers shots or taser strikes fired by the realistic-feeling handgun and taser that work with the system. Officers are required to perform 16 hours of FATS and other range training each year. Officers say that the system is very lifelike, and those with longer experience have noted that they wished they had had the opportunity for such training earlier in their careers.

Indianapolis police had been using an older FATS model in the academy for recruit training, but it was a technologically limited system with only a few scenarios that could not be changed. Officers quickly learned when to shoot and were not confronted with any surprises. The “branching” technology of the newer model allows the operator to select different elements of the scenario, such as what weapon a suspect uses, whether the suspect resists, and which of several outcomes occurs. Rather than a more simplistic shoot/don’t shoot training, the newer model offers enhanced training on decision-making. Additionally, the older model was also physically removed from the firearms range, making it difficult to use for in-service training. The upgraded FATS is a component of the range compound.

In addition to having to follow how the scenario is unfolding and whether and what type of force is warranted, officers must verbally engage the virtual participants as if they were real. This includes working their radio traffic and talking to suspects to manage the situation. Observations of several officers training on the system showed a variety of verbal styles, but instructors were satisfied as long as officers handled the situations appropriately by identifying themselves as officers, explaining commands clearly, and working to diffuse situations.

Officers are taught de-escalation techniques during training. As the firearms staff noted, it is not enough to discipline officers for improperly using force; it is necessary to provide the skills for de-escalating conflict that may not come naturally. Instructors emphasize that use-of-force training is part of the overall goal of learning good decision-making—the shots not fired are as important as those that are. During the training, instructors try to bring officers to the level of stress they may face in the field and then train their positive responses to correspond to that level. The range staff specifically mentioned a recent case in which an officer who was involved in a shooting later said that he heard his instructor’s voice in his head during the incident telling him what to do.

The Indianapolis Police Department noted that the current generation of officers is different from previous generations in that now most officers do not have a military background. Unlike previous generations who had much more experience with physical force, officers from more recent generations actually need to be trained to fight and to be comfortable in using force. Although it may sound counterintuitive to many, part of training involves getting officers to allow themselves to use force when the situation warrants it. Instructors noted that it is an unnatural act to shoot someone and is not one that most people are able to consider doing when initially confronted with the need to do so.

In addition to engaging officers in realistic situations, the Indianapolis Police Department incorporated training components that will help officers through both the shooting incident and its aftermath. Recruits must write a report on each scenario they encounter, providing as many details as possible (such as color of clothing, number of people in the room, and so forth) to help prepare for the time they will need to be transparent and clear in their reporting, such as when they are testifying in court. It also reinforces their need to be aware of what is going on around them during stressful situations.

Another layer of accountability lies with the firearms review board that reviews statements from officers when firearms are used. These reviews focus on the appropriate steps in the continuum of force, such as whether less-than-lethal options were available, whether the officer identified him or herself, and whether the officer was clear in telling people what he or she wanted someone to do.

The department also invited members of the Citizen's Academy and the City/County Council to experience FATS themselves. Not only does this offer the community an opportunity to observe a key training component on use of force, participating in a FATS scenario can be an effective way to show a community member the difficulty of making quick decisions in the field.

Leadership and Integrity Training

The Illinois Police Department contracted a national consultant to provide training on ethics, character, and integrity for command officers and those potentially advancing to leadership. Five training courses were provided, each taking 2 to 2 1/2 days. Classes had 15 to 33 officers in attendance and included the ranks of deputy chief, captain, lieutenant, sergeant, and patrol officer. Approximately 200 officers participated.

In keeping with the goal of promoting good behavior on the front end rather than having to deal with negative behavior later, the department offered five basic training sessions on integrity:

1. Leadership for Changing Times.
2. Mastering Law Enforcement Leadership Principles and Officer Misconduct.
3. Kinesic Roadside and Field Interview Techniques.
4. Talk Tactics.
5. Use of Force.

The department did not restrict what ranks could attend the various sessions, which were offered on a voluntary basis. This gave officers the opportunity to understand the responsibilities of sworn personnel in different positions. Without the grant, only detectives or managers would have been able to attend. By opening the training to all officers, those who were motivated could learn more about issues important to effective management.

The interrogation and interview sessions were particularly important. Having street managers attend the management training enabled them to learn strategies they may not have been trained on in the past. It also helped street officers become better interrogators and to put together better interviews. With an emphasis on ethics, the training noted that interviews can be misinterpreted and can actually do harm.

The department emphasizes knowledge and skills in good decision-making during training and through policy. Several factors served as incentives, including investigations against the department and a change in the administration. Indianapolis' initiative fit into ongoing efforts to nurture an organizational climate of integrity within the department.

Creating a Culture of Integrity

In many ways, Indianapolis exemplifies how law enforcement agencies can change their organizational culture over time, infusing accountability and integrity. Whereas some grant-funded projects are implemented to stand alone or fade after funding ends, Indianapolis's initiative served to fit into ongoing efforts to nurture an organizational climate of integrity within the department.

Within the agency, the Indianapolis Police Department has continued to emphasize the theme of good decision-making throughout policy and training and has given officers the tools to help them do the right thing. This can be seen in the extent to which supervisors were given responsibility for monitoring pursuits, providing training that helps officers navigate not only dangerous incidents but the administrative elements that can affect their careers, and offering patrol officers the opportunity to attend training on management and leadership. These efforts are concrete ways by which the department can demonstrate its respect and sense of responsibility for its officers. Additionally, continuity of training is facilitated through academy instructors auditing FATS training sessions to see and hear what officers are experiencing and help them incorporate these messages into their own training classes.

The Indianapolis Police Department also adapted the use-of-force training for the Citizen's Academy to educate members of the group on the new policy. Members of the Citizen's Academy and the City/County Council were invited to use the upgraded FATS to experience part of what it is like in such situations. The department also periodically invites new City/County Council members and Citizen's Academy trainees to use FATS. According to the Citizen Police Complaint Board, the use-of-force situation has improved dramatically. The number of sustained complaints has decreased and most allegations typically involve a relatively minor action, such as handcuffs being too tight.

To enhance external integrity as it relates to the larger community of law enforcement, the Indianapolis Police Department has stated that it would welcome the opportunity to share its experiences with other agencies.

COMMAND STAFF INTEGRITY TRAINING

Seven grantees received funding through CCI to implement command staff training on integrity-related topics:

1. Detroit (Michigan) Police Department.
2. Middlesex County (Massachusetts) Sheriff's Office.
3. Pinellas County (Florida) Sheriff's Office.
4. Portland (Oregon) Police Bureau.
5. Salt Lake County (Utah) Sheriff's Office.
6. Suffolk County (New York) Sheriff's Office.
7. Worcester County (Massachusetts) Sheriff's Office.

These projects included training on some of the most challenging issues in law enforcement today, such as racial profiling, early identification and intervention systems, managing use-of-force issues, citizen complaint intake and investigation, and ethics and integrity. Different mechanisms were used to deliver the training at the different sites. Middlesex County and Pinellas County contracted with their Regional Community Policing Institutes (RCPI) to provide training to their agencies and others in the county and state, respectively. In Worcester County, the sheriff's office had planned to use a consultant but instead had the expertise internally to refine the training and prepare staff to be instructors. The sheriff's office used RCPI training curricula as a basis for its training. Portland planned to contract two police psychologists to lead four 1-day retreats for those of lieutenant rank and higher and candidates for promotion.⁶ An independent consultant conducted training in Detroit, and in Suffolk County, training was conducted by the Center for American and International Law.

Officer monitoring was the implied focus of these projects, but most did not include any explicit monitoring effort. Although perhaps the same argument could be made concerning supervisory accountability, it seems likely that by providing training, the agency is sending a message that supervisors and managers will be held accountable if the information is not assimilated into their daily operations. In many cases, grantees provided training to other area law enforcement agencies in addition to their own.

Internal Integrity

Training on integrity and accountability measures for command staff can be vital to obtaining buy-in at the higher agency echelon. Approval at this level is important to the positive communication of these measures to line officers and their supervisors. In several cases, agencies—such as the Middlesex County Sheriff's Office, Portland (Oregon) Police Bureau, and Pinellas County Sheriff's Office—offered training to a broad range of ranks. This may be helpful in promoting culture change by educating rank-and-file officers on monitoring and accountability tools that may otherwise be perceived negatively. In Detroit, the department also performed a training needs assessment to identify what each rank considers important training topics for the future.

6. Portland had been granted an extension until August 31, 2007.

External Integrity—Community

Approximately half of the agencies in this area engaged the community when implementing their programs. The Salt Lake County Sheriff's Office planned to involve the existing Citizens' Advisory Board through its participation in periodic evaluations of complaint levels and categories and make recommendations to the sheriff based on community perceptions of the handling of complaints and other integrity-related issues. A workshop with community leaders was held in Detroit to provide the department with information on public perceptions of police while on duty and off duty.

External Integrity—Profession

The Middlesex County and Pinellas County Sheriff's Offices leveraged their grants by working with their RCPIs to offer training to all law enforcement agencies in the county and/or in the state. This dispersion of integrity training to area agencies is one of the significant benefits coming out of this strategy. Evaluating the extent to which there is any subsequent change in behavior is an important step that sites implementing such programs should strive to take.

CASE STUDY NO. 5: PINELLAS COUNTY SHERIFF'S OFFICE

Background of the Jurisdiction and Agency

Jurisdiction: Pinellas County

Location: West Central Florida

Population:

Pinellas County: 947,744 (Florida Department of Law Enforcement, 2005)

PCSO: 283,131 (Florida Department of Law Enforcement, 2005)

Race/Ethnicity: White: 84.1%; Black/African-American: 9.9%; Asian: 2.8%; American Indian/Native Alaskan: 0.3%; Native Hawaiian/Pacific Islander: 0.0%; some other race: 1.4%. Latino: 6.3% (U.S. Census, 2005 estimate)

Area/Density: 280 square miles/3,291 persons per square mile (U.S. Census, 2000)

Agency personnel: 833 sworn; 1,773 civilian (FBI, 2005)

Reported crime:

Total Pinellas County: 7,503 violent offenses; 40,408 property offenses (Florida Department of Law Enforcement, 2005)

PSCO: 1,130 violent offenses; 7,603 property offenses (Florida Department of Law Enforcement, 2005)

Crime rates:

Total Pinellas County: 7.9 violent offenses and 42.6 property offenses per 1,000 population

PCSO: 4.0 violent offenses and 26.9 property offenses per 1,000 population

The Grant

Partnership

The Pinellas County Sheriff’s Office partnered with the Florida Regional Community Policing Institute (RCPI), with whom the Pinellas County sheriff has had a relationship since the RCPI’s inception. The RCPI had already been doing some ethics training, and major city and county chiefs and sheriffs were starting to focus on these issues around the time the grant was being offered. Recognizing that the RCPI represents an excellent vehicle for delivering training statewide, the sheriff’s office subcontracted with the institute to provide ethics and integrity training to command and supervisory staff. The partnership was a natural fit because the Pinellas County Sheriff’s Office is a member of the RCPI’s advisory board.

The Training

The training curricula developed by the New England RCPI and Boston Management Consortium were used with some minor modifications to make them more applicable to the law enforcement agencies in Florida. Courses included the following:

- Use-of-Force Issues in a Community Policing Environment
- Early Identification and Intervention Strategies (EIIIS)
- Racial Profiling: Issues and Dilemmas
- Citizen Complaint Intake and Investigative Issues.

In addition to using these modified New England RCPI curricula, the Florida RCPI developed ethics courses geared toward law enforcement, elected officials, and public servants. Since sheriffs are elected officials, these trainings represent helpful tools for an important part of the law enforcement community. The director of the Applied Ethics Institute at St. Petersburg College, where the Florida RCPI is based, developed the new curricula entitled “Ethical Issues and Decisions in Law Enforcement” and “Ethical Issues for Elected Officials and Public Servants.” His courses, less focused on philosophy and theory, incorporated universal principles. The director emphasized that ethical and legal are not synonymous, which can be a challenging concept, and focused on the gray areas, particularly those involving tension between integrity and loyalty—what happens when you can’t adhere to both?

During the training, the director had participants come up with ethical dilemmas that would be incorporated into the training, and he gave the officer attribution or authorship for the scenario. As a civilian, he felt that he couldn’t write scenarios that would be as applicable or acceptable to sworn officers. He tried to avoid lecturing participants. Break-out sessions and adult learning model strategies made the training interactive.

The RCPI has provided most of the courses throughout the state, those addressing early intervention systems and citizen complaint processes being the most popular. Use-of-force training was also very well received, particularly because tasers came into more widespread use in the department around the same time that the course was offered. Training on racial profiling has been less commonly requested. The course evaluation for each training has been very positive. One of the initiatives undertaken by the RCPI was the Puerto Rico Training Institute. The training

institute’s mission is to provide the same types of services as the RCPIs: community policing and ethics and integrity training as well as technical assistance for law enforcement and community and government constituencies in Puerto Rico. Trainings such as the ones funded under the Creating a Culture of Integrity grant are translated into Spanish and adapted to fit the culture. The grant helped fund the translation of training curricula on ethical decision-making in law enforcement.

Maximizing Program Effectiveness

One of the bigger issues has been determining who should be involved in the trainings, which generally are geared toward supervisors and command staff as well as elected officials in the case of the stand-alone ethics training. Instructors observed that when patrol officers or proxies attended, the trainings’ effectiveness seemed to be limited. “My supervisor should be in here,” was a common refrain, according to project staff. This was addressed by registering applicants through the RCPI rather than through the participants’ individual agencies. That way, the RCPI staff can attempt to push the training to the higher ranks.

Involving the right mix of participants can be an important factor in the success of a training session. When a session has a wide variation in ranks present, it helps when agencies of mixed sizes are represented. For example, the lower ranks of a bigger agency typically won’t feel intimidated to speak if a chief is present from a smaller agency. Geographical representation is positive, as well. When too many neighboring agencies are represented, conversation can be stifled and the situation can be similar to mixing sworn and civilian personnel.

Increasing training on such leadership issues as ethics and integrity may be particularly useful in Florida since the establishment of DROP (Deferred Retirement Option Program). The program was intended to bring new blood to agencies in the state while retiring higher paid workers. According to Creating a Culture of Integrity project staff, the effect has been to decimate law enforcement agencies’ command staffs across the state. Since DROP was instituted around the time of the grant award, the Pinellas County Sheriff’s Office has lost 100 to 150 personnel and the institutional memory and expertise that they possessed.

Project staff recommended having national-level organizations, such as the National Sheriffs’ Association and the International Association of Chiefs of Police, call for certain types of training or initiatives to facilitate getting officer buy-in. This tactic allows agencies to appear to be filling demand rather than creating it. Trainings should be user-friendly but rigorous. Another useful approach may be to give “teaser” classes to agencies’ higher-ups to introduce them to the trainings. If a short introduction can pique their interest, they may provide more support and promote buy-in from those under them.

Project personnel in Florida also noted a growing trend of agencies establishing their own training facilities. These agencies often want the RCPI to bring the trainings to them, but the RCPI is unable to do so unless the agency extends the invitation to other agencies, as well.

Creating a Culture of Integrity

Through its ongoing partnership with the Florida RCPI, the Pinellas County Sheriff's Office made effective use of an existing mechanism to deliver free ethics and integrity training across the state. By adapting the training programs to reflect the local culture and developing a training curriculum addressing issues encountered by elected officials, this initiative provided a useful resource well beyond the borders of Pinellas County.

While training is a critical component in achieving the agency's mission, it should be remembered that training alone will not produce positive organizational change if other factors, such as the demonstrated support of the chief executive officer and others in the upper echelons of the agency, are absent. Additionally, evaluations will help agencies determine the effects of the training. Agencies may want to conduct both short-term evaluations examining what officers feel they get out of the training and long-term assessments that look at whether and how the trainings affected officers' behavior.

TRAFFIC-STOP DATA COLLECTION

Five agencies implemented initiatives aimed at collecting and analyzing data on traffic stops:

1. Cleveland (Ohio) Division of Police.
2. Washington (D.C.) Metropolitan Police Department.
3. Montgomery County (Maryland) Police Department.
4. San Antonio (Texas) Police Department.
5. Summit County (Ohio) Sheriff's Office.

Traffic (and pedestrian) stops have become a focal point for many communities in their perceptions of police behavior. A large number of states have legislatively mandated the collection of stop data on at least the state level in recent years. More than 20 other states are collecting data voluntarily, and many have legislation pending. Only four states have no provisions concerning whether law enforcement agencies collect traffic stop data.

Grantees funded in this strategy area hired independent consultants from outside the department. Of the four sites for which we have information, two sites—San Antonio and Washington, D.C.—contracted with Lamberth Consulting to lead data-collection and analysis efforts. Cleveland and Summit County hired academics from nearby universities—The University of Akron and the University of Cincinnati, respectively—to conduct the studies. The nature of these projects increases the level of officer monitoring as well as supervisory accountability, although it was sometimes difficult to ascertain the specific practices that were in place to hold supervisors accountable.

Several sites used their initiative as an opportunity to engage the community, and all sites conducted research into the data-collection efforts of other agencies or, as stated above, hired a consultant with significant experience implementing this process at other agencies. Few sites appear to have shared their experiences with the field, and only one site, Summit County, submitted a final report to the COPS Office in addition to a traffic-stop data analysis report.

Internal Integrity

With racial profiling a contentious subject among many officers, getting line officers on board can be difficult, but it is important to the success of data-collection initiatives and the subsequent effectiveness of the initiative. This can be facilitated by command staff and supervisors communicating the importance of working toward the elimination of biased policing. Some little things can make a difference, as well. San Antonio realized that adding more paperwork to an officer's shift would likely cause frustration. Rather than developing a new form, new fields were added to existing forms, making the officer's job a little easier. One of the most valuable aspects of having traffic-stop data is agencies' increased ability to monitor officers' behavior during stops. It is only with these data that agencies can understand where they should be focusing their training and other efforts in promoting integrity.

External Integrity—Community

The police departments in San Antonio and Washington, D.C., convened task forces with police and community members to provide input to the decisions about the data-collection processes. As the case study of San Antonio describes more fully, the inclusion of community groups from the beginning helped the department weather criticism when its report was released and led to the development of relationships that did not exist previously.

External Integrity—Profession

The issue of racial profiling has received a lot of attention during the last decade and remains a heated topic in many jurisdictions, with both the public and the police. More and more states are mandating data collection and analysis. Because some officers and departments are reluctant to approach the topic, it is important that those agencies that embrace the usefulness of this information and broadcast it to others in the profession. The San Antonio police posted its consultant's analysis report and the department's response on its web site to give transparency to the department's activities, but it also shows other agencies how the department fared in the analysis and that the subject of bias policing was worthy of serious consideration.

CASE STUDY NO. 6: SAN ANTONIO POLICE DEPARTMENT

Background of the Jurisdiction and Agency

Jurisdiction: City of San Antonio

Location: South Central Texas

Population: 1,256,584 (FBI, 2005)

Race/Ethnicity: White: 64.0%; Black/African-American: 6.1%; Asian: 1.8%; American Indian/Native Alaskan: 0.7%; Native Hawaiian/Pacific Islander: 0.1%; some other race: 24.1%. Latino: 61.2% (U.S. Census, 2005 estimate)

Area/Density: 408 square miles/2,809 persons per square mile (U.S. Census, 2000)

Agency personnel: 1,975 sworn; 507 civilian (FBI, 2005)

Reported crime: 8,007 violent offenses; 80,987 property offenses (FBI, 2005)

Crime rates: 6.4 violent offenses and 64.5 property offenses per 1,000 population

The Grant

Although the San Antonio Police Department is officially listed under the data-collection program area, the department actually addressed two areas, departmental use of force being the other. This section describes how the San Antonio Police Department came to focus on these issues, the implementation of its grant efforts, and the results.

Data Collection

The Creating a Culture of Integrity (CCI) grant opportunity came about around the time the Texas legislature was enacting a statute prohibiting racial profiling by law enforcement (Senate Bill 1074). It was an unfunded mandate requiring each locality in the state to collect information on the number of traffic stops that its officers made. The bill did not provide much additional direction and no consensus existed concerning the standard against which the traffic stop data should be compared. When considering the department's response to the legislation, the chief of police saw an opportunity to address more than racial profiling. He envisioned a strategy to target racial bias more generally and established a broad-based working group composed of community groups and criminal justice agency personnel to develop a racial profiling policy for the department in tandem with the statewide legislation being drafted.

The working group consisted of community groups and advocacy groups,⁷ the Bexar County Criminal District Attorney's Office, patrol and traffic officers, members of the San Antonio Police Department administration and officers' unions, the research and planning unit, and psychological services unit. This working group was consensus-based—no official vote or tally was ever taken. Although the group served more as a brainstorming forum and did not have a direct role in selecting the contractor to analyze stop data, the members understood that it afforded them the opportunity to provide input to the department. This forum also offered the community organizations a deeper understanding of a patrol officer's experience on the street.

This interaction paid off in several ways. As a result of the working group's efforts, the police department's data-collection policy was ready before the law was enacted. After the group's official mission was complete, the department started holding regular meetings with the individual constituencies to keep these channels open, rather than waiting for a negative situation to occur. One positive result of cultivating these relationships is that when the racial profiling study was released the National Association for the Advancement of Colored People (NAACP) publicly supported the San Antonio Police Department.

The new law mandated the collection of two tiers of traffic-stop data:

- Tier 1, which was to be implemented on January 1, 2002, requires collection of information when a citation is issued because of a traffic stop and includes data on race, ethnicity, whether a search is conducted, and whether the search is consented to.
- Tier 2, which was to be implemented on January 1, 2003, requires the additional collection of data on gender, race, ethnicity, reason for the stop, whether contraband is found, whether probable cause exists, whether an arrest is made, whether a warning or citation is issued, the address of the stop, and the result of the stop.

7. These included the American Civil Liberties Union, National Association for the Advancement of Colored People, Mexican American Legal Defense and Educational Fund, League of United Latin American Citizens, Gay/Lesbian Alliance, National Council of La Raza, Anti-Defamation League, Gay & Lesbian Community Center of San Antonio, National Organization of Women, and Baptist Ministers Union.

The working group recommended that the San Antonio Police Department implement both tiers on January 1, 2002, rather than waiting until 2003 to start collecting Tier 2 data. Additionally, the department required officers to collect information on the duration of the stop and race/ethnicity perceived by the officer. The department realized that most of the information was already being collected on existing forms and elected to add fields to these forms rather than create new ones, which would likely be perceived as burdensome. This was an important decision for obtaining buy-in from patrol officers.

The department wanted an analysis of traffic stop data compared against a benchmark rather than against population estimates. Through a competitive selection process, the department engaged a consultant to conduct an independent analysis and provide recommendations. The consultant conducted observational road surveys to determine who is actually driving on the roads in various areas of the city at particular times.

The consultant's research team met with police department representatives for 3 to 4 days on two occasions each (April and June 2003) to review benchmark locations. Issues discussed included traffic patterns, traffic density, sight lines for surveyors, lighting, surveyor safety, police activity, and type of vehicles stopped by police. A request-for-qualifications selection committee that included individuals from the police department, the Department of Public Safety, and Bexar County Sheriff reviewed the study's approach.

Surveyors hired and trained in the systematic surveying process conducted surveys at 39 locations between June 22 and August 8, 2003. The locations were determined by the high number of stops, traffic patterns, and surveyor accessibility, and surveys were conducted on randomly selected days and times at each location. To observe and record the driving population, surveyors stood at the selected intersections (stationary surveys) and also drove along particular stretches of highways (rolling surveys). They also conducted pedestrian surveys at four high-stop locations. Several methods of quality assurance were used: inter-reliability tests, presurvey reviews for each location, ongoing status meetings, post-survey reviews, periodic data reviews, and data entry reviews.

More than 95 percent of the 44,507 drivers and 7,044 pedestrians coded in the surveys were identified by race or ethnicity. On its side, the San Antonio Police Department captured 288,490 stops during 2002, with all but fewer than 100 having race and ethnicity information. The consultant's report asked the following questions:

- Is there evidence of racial profiling in San Antonio?
- Which minority groups, if any, are targeted?
- In which locations is profiling likely to occur?
- Does post-stop activity indicate profiling?
- Are there special circumstances that might be interpreted as biased policing?

An important part of the process was the ongoing communication between the police department and the consultant. During the analysis, the department provided information on the contemporary efforts (e.g., directed patrol) that could account for unusual disparities found in the data. This process helped answer questions rather than raise them.

In the final report, released in December 2003, the consultant used an “odds-ratio” methodology. This refers to the likelihood of a member of a particular minority group being stopped compared to nonminorities being stopped. A score of 1.0 would indicate that minority and nonminority groups are stopped at the same rate. The consultant’s framework recommended a review of stops if the odds-ratio was between 1.6 and 2.0, arguing that a review is required if the ratio exceeds 2.0. Because the consultant’s previous work had found a lower inter-rater reliability for observations of Hispanics than Blacks, slightly higher and therefore more conservative thresholds were used (1.7–2.2 and greater than 2.2, respectively). Four locations had odds-ratios of greater than 2.0 for Black motorists and two locations exceeded 2.2 for Hispanic motorists.

The following are the observed findings for Black and Hispanic motorists:

Black

- 3 sites below 1.0
- 5 sites equal 1.0
- 13 sites between 1.0 and 1.5
- 14 sites between 1.5 and 2.0
- 4 sites above 2.0
- 1.3 overall odds ratio for Black motorists.

Hispanic

- 12 sites below 1.0
- 1 site at 1.0 exactly
- 18 sites 1.1 to 1.7
- 6 sites 1.8 to 2.2
- 2 sites above 2.2
- 1.2 overall odds ratio for Hispanic motorists.

Searches also showed higher rates for Black motorists, but the report notes that benchmarking of searches is more complicated. In this case, it may be that directed patrols and greater deployment of officers in certain locations are more likely to encounter Black individuals, a greater proportion of individuals on probation, and parole in these areas may have been Black. Hit rates (the rate in which contraband is actually found) were similar for all Black, Hispanic, and White consensual searches. A slightly higher hit rate was found for Whites in probable-cause searches.

The consultant made several recommendations to the San Antonio Police Department:

- Add data fields in the collection system to indicate an extensive criminal background and whether the driver has been asked to consent to a search; there should also be space to allow officers to indicate that a stop is being made based on third-party information.
- Monitor high odds-ratio locations.
- Provide officer training specific to racial profiling and when using race is appropriate in policing.
- Agency and the community should continue the excellent cooperation developed on the project.
- The San Antonio Police Department should audit stop data by encouraging more officers to call in all traffic stops to the dispatcher.

In response to these recommendations, the San Antonio Police Department has added the suggested fields to its system, noted that its officers already receive an annual 4-hour training on racial profiling, has maintained relationships with the community, and is reminding officers to call in traffic stops in compliance with departmental policy. The department also responded to the finding that there were six high-odds locations. According to the department, all the locations were located in high-crime areas that were being targeted with more directed patrols.

The police department continues to collect stop data and, in compliance with the racial profiling law, reports the results annually to the city. In contrast to the original project report that provided great specificity concerning who was being stopped, the time and location of the stop, and the nature of the interaction, these reports offer only totals for African-Americans and Hispanics. The department also does not compare stop data to selected benchmarks as was done for the CCI grant program. Because only aggregate data of minorities are compiled and reviewed—rather than comparing the stops at particular locations against an externally derived standard—the utility of these data for agency decision-making is limited.

The working group helped strengthen relationships between the San Antonio Police Department and community groups. Although the group did not continue to operate after issuing its recommendations, several groups began meeting with the department's command staff on a regular—typically monthly—basis. Other important conversations are taking place, as well. In relation to the issue of racial profiling in particular, a community seminar revealed that many people did not understand what constitutes racial profiling. To remedy this, public service announcements (PSA) were aired in August 2005. According to the head of the NAACP in San Antonio in November 2005, she had not received any complaints about racial profiling since the PSAs were run.

Use of Force

The San Antonio Police Department also addressed the department's use-of-force policies with CCI grant funding. Although the department had employed a use-of-force form since 1997 or 1998, it was intended for internal use to fulfill accreditation standards set forth by the Commission on Accreditation for Law Enforcement Agencies only. When the department refused to turn over these data to a local newspaper, the paper filed suit. Eventually, the U.S. Supreme Court determined that the data are public information, and police department released the information. When the CCI grant opportunity became available, the department decided to conduct an independent study to proactively identify use-of-force issues.

The San Antonio Police Department solicited proposals from outside the city specifically so that the effort would be perceived as independent of the department. The consultant contracted by the department reviewed the 1,066 use-of-force reports filed by San Antonio police officers from July 1, 2001 through December 31, 2002, as well as citizen complaints generally and force specifically from January 1, 1998 through December 31, 2002. The level of force that triggers a report involves an action more severe than open/empty hand-control techniques and does not include handcuffing.

The findings were generally positive, with use of force typically used “sparingly,” according to the consultant’s report. Neither officer nor citizen characteristics (race, sex, and education) appeared to be related to differences in the use of force, but there did appear to be a small group of officers who accounted for a relatively large share of use-of-force reports and complaints, and Blacks appeared to be overrepresented in being subjected to use of force compared to their population figures. Hispanics were overrepresented in one area but were underrepresented otherwise. Also important, the consultant noted that the study did not make judgments about whether the uses of force were appropriate because important contextual information, such as the level of resistance offered by citizens or other contextual factors, is not collected making it difficult to infer reasons for the application of force.

Based on the analysis, the consultant suggested that the San Antonio Police Department change the use-of-force forms to capture such information as the following:

- Level of citizen resistance
- Whether citizens on the scene represent a threat to each other and require police restraint
- Whether the citizen has a weapon, regardless of whether it is being used
- Citizen impairment
- Whether the incident is initiated by the officer or citizen
- Number of citizen and officer bystanders present.

The consultant also recommended that officers and supervisors complete detailed, chronological reports on incidents of force and that the officers’ supervisors travel to the scene of a force incident to obtain additional detailed information from the victim and witnesses. To improve the level of information about the context of officers’ use of force, incidents in which citizen resist should be reported, regardless of whether the officer applies force in return. The department should also implement a use-of-force continuum. Additionally, the consultant suggested not using use-of-force reports alone to analyze a department’s application of force in the field. Citizen complaints, arrests, reported crime, and calls for service should also be recorded to obtain a more complete picture.

Using the consultant’s report, the department modified the use-of-force form to capture the information recommended, implemented a use-of-force continuum, and began looking at ways to incorporate use-of-force reports into the department’s early intervention system. The department also implemented a policy requiring supervisors to interview all participants at the scene of officer use of force or document why he or she could not go to the scene.

The department responded to the finding that Blacks are more often subject to force by noting that Blacks “are arrested for crimes where resistance to arrest (and thereby resulting in [use of force]) is more frequent.” Department data show that, for the 18 months of the study, Blacks represented 6.6 percent of the city’s population but accounted for 13 percent or more of the arrests for assaults, narcotics, escape/evade, and warrants. The department argues that local, state, and national arrests data reflect the findings in San Antonio, where the proportion of arrests based on citizen-initiated calls is essentially the same as those originating from police-initiated calls.

Creating a Culture of Integrity

The San Antonio Police Department systematically addressed two issues of major importance to law enforcement and the local community, namely, racial profiling and use of force. Although the establishment of state legislation and a lawsuit served largely as the impetus for focusing on these issues, the department did not simply fulfill its legal obligations and move on. The department commissioned independent, rigorous studies to determine the current state of affairs and to identify ways to move forward productively. In addition to recognizing that doing the minimum is not the way toward being perceived as having integrity, it is clear that the department understands that pursuing organizational integrity requires action on numerous fronts.

Within the organization, taking these issues beyond the minimum obligation sends a message to officers that these issues are real and important to confront and solve. Other actions, such as modifying existing data-collection forms rather than making officers complete another new form, showed patrol that their concerns were being taken into consideration. Establishing policies on the different elements such as data-collection procedures and requiring supervisors to be on the scene of incidents of police use of force are also necessary steps to making them feel meaningful. Even better is the creation of policy that includes accountability measures, such as the requirement that supervisors document why they cannot go to the scene of a use-of-force incident.

Externally, the department took several steps to include the community directly in the project. Many important community groups were invited to play a significant role in determining how the department would respond to the state’s racial profiling legislation. The value of this step was proved when the NAACP backed the department when the racial profiling study was released. It also had the added benefit of establishing ongoing relationships between community constituencies and high levels of the department.

Posting the racial profiling and use-of-force reports as well as the department’s response to those studies on the department’s web site offers something valuable to both the local community and the larger law enforcement community. Taking the initiative to prepare responses to the studies and to detail the steps already taken or plans to address the findings demonstrates that the department did not just put the consultants’ reports on the shelf. Making such information available for review additionally helps the agency walk the walk of accountability and integrity.

OTHER STRATEGY AREAS

Eleven agencies were funded under the other six strategy areas. The following discussion of nine of these projects briefly examines their implementation and the extent to which they promoted cultures of integrity.⁸

1. Buffalo (New York) Police Department.
2. New York (City) Police Department.
3. Charlotte-Mecklenburg (North Carolina) Police Department.
4. Pittsburgh (Pennsylvania) Bureau of Police.
5. Contra Costa County (California) Sheriff’s Office.

8. Two areas are not discussed in this section. The Fairfax County (Virginia) Police Department successfully implemented an early intervention system but did not include the proposed mapping component. The St. Louis (Missouri) Metropolitan Police Department originally proposed implementing an EIS but switched to developing a civilian review board. The project is ongoing and has been granted an extension.

6. San Mateo County (California) Sheriff's Office.
7. El Paso (Texas) Police Department.
8. Orange County (Florida) Sheriff's Department.
9. Houston (Texas) Police Department.

Strengthening IAD Operations

The Buffalo (New York) Police Department implemented a comprehensive initiative to improve a broad range of organizational policies and practices because of a federal investigation in the mid-1990s showing a pattern or practice of abuses. Addressing Internal Affairs Division (IAD) operations was one initiative among many undertaken at the time to alter the organizational culture. With CCI funding, Buffalo implemented a comprehensive upgrade to its professional standards function, strengthening its use-of-force policy, enhancing computer systems, designating an officer to input and track use-of-force data and determine whether further investigation is warranted, producing a procedures manual, hiring a civilian to transcribe sworn recorded statements taken by investigators, and training officers and community members on issues of use of force, hate crime, and professional traffic stops, among others.

The New York (City) Police Department produced two professional quality DVD programs addressing corruption prevention. The programs included information on ethical decision-making, the impact of corrupt or unethical behavior on the community and police culture, internal affairs investigative processes, and ways to identify police misconduct. The department made 500 copies of the DVDs to distribute free of charge to other law enforcement agencies.

Charlotte-Mecklenburg (North Carolina) Police Department grant funds went into documenting the agency's internal affairs policies and procedures in a standard operating procedures manual, implementing an early intervention system (EIS), and producing a manual on the use of EIS made available to other agencies. These initiatives were implemented successfully, and the manuals were posted on the department's web site.

To enhance the agency's ability to combat corruption, the Pittsburgh (Pennsylvania) Bureau of Police modernized the Integrity Unit and strengthened the training of unit personnel. The Integrity Unit's capacity for collecting and maintaining investigative information was previously entirely paper-based. CCI funding allowed the unit to purchase intelligence software and database products, computers, and surveillance equipment. To improve the quality of investigations, unit members received training on interviewing and interrogation techniques, statement analysis, internal investigation procedures, case and link analysis, and geographic information systems. The agency's two main challenges were resistance from the Fraternal Order of Police (FOP), which argued that the Integrity Unit was institutionally redundant, and reluctance of the District Attorney to prosecute cases against officers without overwhelming amounts of evidence. An arbitrator proved that the FOP's allegation was false, and project staff note that the proportion of information coming from within the Pittsburgh Bureau of Police itself (70 percent) was indicative of the weakening of the "blue code of silence." Concerns with the District Attorney's Office appear likely to continue to be challenges.

Self-Assessment Techniques for Internal Monitoring

Two grantees conducted internal audits to improve policy and training. While evaluation of subsequent organizational behavior would be needed to determine their effectiveness, these reviews and the subsequent changes made are important

The Contra Costa County (California) Sheriff's Office hired a law firm to evaluate four important organizational functions: training and training needs identification, background investigation and hiring processes, internal investigations, and internal inspection and audit processes. The firm reviewed the functions to determine if they were in compliance with the law, if the functions worked together to help the agency hire and train the best employees, to identify and correct deficient behavior, and to identify areas for improvement. The only major challenge was the need to overcome territorial attitudes within the department, which was accomplished through continual explanation by the undersheriff of the purpose and necessity of the project to improve the organization. The results of the review and recommendations were incorporated into each Division Operations Manual; the agency plans to evaluate the issues raised in the firm's report on a regular basis.

In San Mateo County, California, the sheriff's office conducted a thorough audit of its Internal Affairs Unit's functions around improving techniques for internal monitoring, strengthening operations, and improving the citizen complaint process. The agency reviewed and revised internal affairs policy and produced a revised internal affairs manual; developed a computerized case management system through an outside vendor; adopted criteria for an early intervention system; and trained supervisory personnel on the new policies and procedures. A consultant with a law degree was contracted to oversee the project, conduct training on the new policies and procedures, help compile the internal affairs manual, and participate in the research and selection of the case management system vendor.

Outreach to Minority Youth

The El Paso (Texas) Police Department implemented a comprehensive enhancement to its Multi-Agency Referral System (MARS), which had already been operating in the city's schools to identify and work with minority at-risk youth. Grant funding allowed MARS to hire two program coordinators and continue to expand the referral network of community social service agencies and businesses. MARS held numerous outreach events on a wide array of issues such as drugs, health, literacy, medical screenings, sexually transmitted diseases, and parent/student involvement. Crime-prevention trainings were offered on topics of importance to youth and a youth empowerment conference was held. In addition, MARS achieved the goal of gaining the participation of all city schools and involved more than 160 other public and private agencies and businesses. Teams of police officers, educators, and social service providers identified children and families in need of services. This initiative appears to have enhanced a model that had already shown success in improving trust among youth, police, and social support agencies.

In an effort to address the public safety issues created by high truancy and drop-out rates in the Orange County, Florida, public school system, the local government had forged a partnership with a faith-based community in the private sector and established a private school for troubled teens. As part of the project, and in addition to functioning as school resource officers, two sheriff's deputies in the school were paired with a social worker to provide an ongoing, full-year system for monitoring and assessing students' needs and the needs of their families.

Financial and transportation challenges led to moving the program from the private school to two public elementary schools. A variety of services was provided, including academic and attendance monitoring, mentoring, home visits, parenting workshops, and counseling for students and their families. More than 100 students received services, but finances continued to be problematic and the program was put on hold. Moreover, there were challenges associated with the deputies' involvement. In addition to being reassigned frequently, the deputies resisted the idea of working with the civilian social workers.

Improving Citizen Complaint Processes

The Houston Police Department proposed a comprehensive redesign of the agency's complaint processing system that would shift responsibility for citizen complaints from Internal Affairs to an alternative dispute resolution (ADR) process. The newly created Central Intake Office would determine whether a dispute between employees or between employees and residents should be handled by Internal Affairs or could be resolved through mediation. Agency employees who staff the ADR process implemented the grant initiative. This effort built on an existing process for screening and tracking employee complaints and addressed redesigning the intake process, the department's response, the resolution process, and the follow-up process.

With the knowledge that changes in this area could be controversial at all agency levels, ADR staff educated the chief of police, command staff, and union leadership on the benefits of mediation. Through this effort, the project was accepted throughout the agency as a positive change. Project staff also worked to educate the community about the new system through presentations to community groups, public service announcements, and promotional materials.

SECTION IV

Many useful lessons emerged from the Creating a Culture of Integrity initiative. This section will address the main benefits and challenges the sites encountered when implementing the initiative. This section also provides a number of suggestions for strengthening the integrity of their agencies, including a discussion about where researchers might be useful for focusing future efforts to increase and enhance the police integrity concept.

Range of Efforts

Grantees launched projects in a dozen different areas and used a variety of strategies to implement them. Figure 16 lists many of the activities conducted by grantees under each strategy area.

Strategy ⁹	Activities Implemented
Ensuring Accountability to the Community	<ul style="list-style-type: none"> • Conducted community surveys and focus groups • Provided integrity training in partnership with the community • Developed publications to educate the community on policing • Created youth programming • Launched publicity campaigns and public service announcements • Involved the community through participation on steering committees, advisory councils, and other decision-making bodies • Reviewed policies and practices • Purchased or developed software to improve case management, handling of complaints, or address other needs • Hosted conferences with the community to overcome historical tensions • Created information-sharing partnership with the private sector
Development of Early Intervention System (EIS)	<ul style="list-style-type: none"> • Conducted best practices research on other agencies' experiences with early intervention systems • Identified behavioral indicators and thresholds for at-risk behaviors • Designed EIS software • Developed policy concerning minor infractions and intervention processes • Integrated stand-alone personnel and operations databases into one system • Provided training to agency personnel on EIS and leadership issues • Involved line officers in the development of EIS • Created a standing body to review EIS reports and determine whether intervention was warranted • Established dedicated position to handle daily operations of EIS

9. Information on Mapping Integrity Violations and Utilizing a Civilian Review Board was unavailable

<p>Recruiting Quality Candidates from Local Communities</p>	<ul style="list-style-type: none"> • Advertised in media targeted toward specific community constituencies • Partnered with churches and other community groups to identify qualified and interested candidates • Upgraded the agency's web site to make it more user-friendly and streamlined the application process • Hired a professional recruiter with experience working with law enforcement agencies • Worked with the state Commission on Peace Officer Standards and Training to identify culturally specific training for recruiting teams • Covered the costs of academy tuition and exams for targeted applicants • Provided stipends to targeted candidates to cover expenses during academy training • Translated recruitment materials into languages spoken in targeted communities • Developed recruitment materials that show representation of targeted communities • Produced DVDs to distribute and show at various venues and events • Established an internship program to help prepare interested candidates for the application process • Created youth curricula and programming on the criminal justice system and the agency's role, including tours of criminal justice facilities
<p>Command Staff Training on Ethics and Integrity Issues</p>	<ul style="list-style-type: none"> • Conducted training needs assessment • Held training programs with command staff and other ranks on integrity-related subjects including EIS, traffic stops, use-of-force policy and training, and the citizen complaint process • Provided training to agencies from other jurisdictions through partnerships with Regional Community Policing Institutes • Offered training and education programs to the community on integrity-related topics • Involved the community in making recommendations for training • Invited the community to participate in training • Developed new integrity-related training curricula • Adapted training curricula to the local or regional context
<p>Use-of-Force Policy and Training</p>	<ul style="list-style-type: none"> • Reviewed and revised policies and procedures on use of force and pursuit • Improved technological capabilities of internal affairs divisions • Hired a law enforcement research firm to publish a review of the agency's policies and procedures on use of force • Invited the community to provide its perceptions of the agency and officers' use of force • Provided enhanced firearms and related training that emphasizes good decision-making rather than simply when to shoot
<p>Traffic Stop Data Collection</p>	<ul style="list-style-type: none"> • Involved representatives from community organizations in determining the agency response to legislation • Worked with national experts to implement systematic collection methodologies and to obtain an independent analysis of traffic stops • Used the start of data-collection efforts as an opportunity to establish ongoing dialog with various community constituencies

Strengthening Internal Affairs Division (IAD) Operations	<ul style="list-style-type: none"> • Reviewed and revised use-of-force policies and procedures • Upgraded division technology to enable better tracking and analysis of data • Assigned a designated officer to input and track data • Compiled a procedures manual • Prepared a guidebook for the public and agency personnel on how the agency handles misconduct allegations • Produced DVD programs to educate officers on preventing corruption and the effects of corruption and misconduct on the agency and on officers' lives • Developed informational brochures to educate the public on the agency's complaint process • Conducted training for officers and community members on various topics related to diversity and policing operations • Strengthened investigative training for IAD personnel • Purchased surveillance technology to enhance investigative capabilities
Self-Assessment Techniques for Internal Monitoring	<ul style="list-style-type: none"> • Hired a law firm to conduct an independent audit and evaluation of agency policies and procedures • Researched best practices used by other law enforcement agencies • Upgraded the agency's internal affairs unit's policies, procedures, and technology • Trained supervisory staff responsible for handling citizen complaints, internal investigations, and disciplinary decisions
Outreach to Minority Youth	<ul style="list-style-type: none"> • Expanded agency referral networks with community social services and businesses • Held outreach events on various issues such as drugs, sexually transmitted diseases, literacy, and parent/student involvement • Conducted crime-prevention training on youth topics • Held a conference on youth empowerment • Expanded outreach within the public school system • Partnered officers with social workers in the schools • Provided ongoing case management for students • Engaged high school student and other youth to serve as volunteers with younger children
Improving Citizen Complaint Processes	<ul style="list-style-type: none"> • Redesigned the agency's grievance process • Established alternative dispute-resolution process for appropriate cases

Even though agencies engaged in an impressive range of activities, it was possible to identify numerous themes within and across strategy areas that pertain to creating culture change toward integrity and addressing the goals of community policing including decreasing officer misconduct, increasing community trust, and advancing the profession of law enforcement. In this section, our discussion of benefits and challenges takes an even broader view to address the future of law enforcement agencies' efforts in creating cultures of integrity.

Benefits

The Creating a Culture of Integrity (CCI) grant program succeeded in identifying a series of innovative police initiatives that could be linked to important concepts of police integrity. CCI built on the work done at the 1996 *National Symposium on Police Integrity* and the 1999 *Strengthening Police-Community Relationships* conference by identifying each individual strategy as part of larger efforts to address integrity in law enforcement and further emphasizing integrity as a federal priority. Fifty-nine agencies at different stages in their pursuit of organizational integrity received funding to implement one or more of these initiatives. Although some agencies were able to allocate grant funding toward enhancing an already robust set of practices, most others used the funding to put in place a new process or policy that broadened their integrity efforts. Funding additionally helped several sites that were federally mandated under pattern or practice authority to rework policies such as use of force or data collection.

When considered broadly, the initiatives funded under the CCI program assisted approximately 59 law enforcement agencies in improving their organizational integrity through the strengthening of relationships in three fundamental areas: 1) inside agency; 2) between the agency and the community; and 3) helping to develop linkages with the larger profession of law enforcement. As described in detail in Section II, these three areas of integrity emerged from our review of the extant research on organizational integrity combined with the broad goals of community policing and the growing trend toward the establishment of nationally recognized best practices within law enforcement. As the examples highlighted below illustrate, agencies made significant advances in each area of integrity.

Increased Internal Integrity: Increased Levels of Officer Monitoring

Officer monitoring and supervisory accountability are complementary strategies for regulating officer discretion and promoting ethical behavior. Monitoring refers to the extent to which officers' actions can be documented. This is a means of equipping the agency with information that can be used to improve training, respond to inquiries from the community, change resource allocations, and provide consistent discipline. Data collection, EIS, IAD operations, self-assessment, and use-of-force projects were more likely to include a monitoring component. Monitoring can take a direct form in which information about particular actions is tracked (e.g., requiring an officer to collect certain information when making a traffic stop) or a less-direct form that does not necessarily collect new information on officers' behavior (e.g., having different databases feeding into the EIS provide a more efficient way for supervisors to account for their officers' behavior).

Increased Accountability of Supervisors for the Behavior of their Officers

Supervisory accountability refers to the steps taken to ensure that supervisors and managers are responsible for overseeing the use of discretion by, and behavior of, their officers. This typically requires the adoption of policies that note specific obligations; for example, agency policy might require a supervisor to respond to an incident of an officer's use of force by going to the scene personally to take statements. Additionally, an EIS protocol might specify when a supervisor is required to speak with an officer whose profile generated an alert. EIS and use-of-force grantees

were particularly inclined to provide increased officer monitoring and supervisor accountability for officers under their command. Command staff integrity training, data collection, EIS, IAD operations, and use-of-force programs typically promoted increased accountability.

Increased External Integrity: Community Established Meaningful Relationships with Community Constituencies

Meaningful relationships are those in which the community is given an opportunity to provide real input into agency decision-making and the agency offers transparency and good-faith efforts at improvement. Accountability, recruitment, and use-of-force grantees were most likely to establish such relationships. Jacksonville (accountability) and San Antonio (data collection) offer two excellent illustrations of this achievement. In Jacksonville, the agency not only continued to engage the community through the Sheriff's Advisory Council initiative but understood that these positive relationships are maintained and enhanced by meaningful action, such as the improvement of the complaint process. San Antonio included representatives of major advocacy organizations in a work group to decide how the agency should respond to new legislative mandates around racial profiling. The San Antonio Police Department command staff continued to meet regularly with these groups after the work group finished its work, with the topics covered extending well beyond traffic stops. As noted in the data-collection case study, the strength of these relationships can be seen when the NAACP stood by the department when it released its traffic-stop analysis report to the public.

Increased External Integrity: Profession Leveraged Resources to Provide Services to Additional Law Enforcement Agencies

Sites conducting command staff integrity training through Regional Community Policing Institutes were able to offer training programs for many agencies in addition to their own. By making use of other agencies' experiences, agencies can incorporate lessons learned from previous efforts. This process tends to occur when agencies are attempting to implement complex and controversial projects such as early intervention system or traffic-stop data collection initiatives.

The creation of sustainable programming was another benefit of CCI funding that was important across all integrity strategies. Nearly all sites included plans in their grant applications for sustaining their programs. That being said, certain strategy areas lend themselves more readily to institutionalization. Use-of-force policy revisions are inherently more likely to be sustained by virtue of being officially adopted as agency-wide practice. Early intervention systems are similarly well-positioned to be sustained because much of the cost is up-front technology expenditures. Other projects can be more susceptible to budget shortfalls and shifting priorities; for example, community surveys may be conducted during a single year with the intention of conducting subsequent surveys annually, but without a specific funding source or policy mandate, the vicissitudes of local and state budgets can derail these efforts.

Challenges

CCI grantees experienced several challenges that are frequently encountered during implementation processes. We discuss the more common challenges here.

Changes in Leadership and Project Staff

Leadership and personnel changes can create problems ranging from short project delays to a complete change in direction. A broad variety of changes can affect program success, including changes in the original point person or “champion” of the program, or changes in departmental leadership that alters organizational priorities away from the program being developed. Changes in leadership and staff affected numerous projects. In Fulton County, Georgia (EIS), for example, when the chairman of the county’s governing commission resigned, processing the sheriff’s purchase orders for the EIS experienced lengthy delays. Similarly, the Oakland Police Department (EIS) also dealt with delays when the vendor’s ownership changed. Police leaders in Oakland also noted that staffing such a project had proved difficult because it required expertise in numerous areas, including contract law, technology, policy development, management information systems, databases, and personnel management.

Officer and Community Buy-In

Obtaining buy-in from line officers is a challenge when departments attempt to implement programs intended to enhance or monitor integrity. Often officers view these new programs as a reaction to a perceived problem with their individual integrity by the leadership of their agency, a view rejected by most line officers. Moreover, efforts to increase diversity may be viewed by some officers as prioritizing demographics over quality, causing them concern about the operations of the agency. Obtaining officer buy-in was a priority for several agencies. Leadership from the Seattle Police Department (EIS), for example, attempted to increase officer buy-in by including in the process from the very beginning those who were going to be most closely monitored by the system during its operation. In Jefferson County, Colorado (Accountability), those involved in implementing the initiative noted that the title of the grant “Creating a Culture of Integrity” produced strong opinions, both positive and negative, even before the project began. Marketing the grant project positively to the entire range of departmental personnel on the front end may have prevented the agency from exerting a significant amount of effort during the project to get employees on board. Pittsburgh’s (IAD operations) efforts to improve internal investigations through a new Integrity Unit were met with more formal resistance from the Fraternal Order of Police (FOP). The FOP tried to block the unit’s establishment, arguing that two other existing offices, the Office of Municipal Investigations and the Police Civilian Review Board, already addressed criminal conduct by police officers. These offices deal primarily with citizen complaints, and an arbitrator disagreed with the FOP that the new Integrity Unit was redundant.

The Houston Police Department (Citizen Complaints) offers an example of a thorough, carefully considered strategy for rolling out a potentially contentious initiative. Realizing that the creation of an alternative dispute resolution process, including a mediation component, was a significant change that would likely be met with suspicion from all segments of the agency, Houston staff took deliberate steps to prevent this outcome. Project staff first educated the chief of police and command staff about the benefits of mediation, and once the upper ranks had bought in,

project staff successfully lobbied for changes in policy to include the mediation process. Project staff then met with the union and were able to have the new mediation procedure included as part of the Houston Police Officers' Union contract with the city. With the command staff and union on board and a policy created, the department's employees were in a good position to begin being educated about the new process. The department also made a significant effort to publicize the mediation option during planned events as well as when coming into contact with specific individuals who could benefit from the process. One lesson from this example involves the considerable time commitment that is necessary to obtain true officer buy-in. In most cases, officers are reluctant to commit to a new program after the agency describes the program in a single meeting. A process of real dialog involving many questions and honest responses will result in a more broad-based commitment to give the program a chance to succeed.

In addition to the problem of officer buy-in, some agencies experienced challenges in convincing community partners to participate in their initiatives. For example, the Orange County (California) Sheriff's Office (Minority Outreach) proposed an ambitious program aimed at reducing truancy, drop-out rates, and juvenile crime. The program would provide a full-time senior social worker and a full-time social worker to partner with the school resource officer (SRO) at two local elementary schools to provide counseling and other services to students and their parents. The endeavor experienced an initial significant delay in implementation because of changes in grant leadership. Once new staff were assigned to the program the project encountered a new series of additional challenges specific to community buy-in. Parents were wary of their children participating in the program because of the involvement of members of law enforcement and fears that the police would arrest their children because of information provided to the social workers. Additionally, the SROs were resistant to working with the civilian social workers. Obtaining buy-in from both community and law enforcement stakeholders during the planning stage of the project could have helped reduce delays in implementation significantly.

Technological Problems

Technological problems often delayed projects where computers and information technology were an integral component, particularly EIS systems. The challenges of implementing new technology occurred in a number of areas. First, it was quite common for new technology to take much longer to be purchased and delivered than anticipated. Municipal purchasing regulations, including the requirement of a public bidding process, slowed the acquisition of new equipment in a number of communities. Once acquired, the new software or hardware frequently did not deliver what was promised by the sales representatives or was not as functional in the field as was anticipated. Newly purchased software, for example, often did not work seamlessly with existing departmental software programs. From existing records management systems to personnel management systems to budgetary systems, many agencies faced problems attempting to merge information from these separate legacy systems. Ironically, once these challenges were overcome, agencies were often faced with vendors returning to their agencies offering an improved update to the system they originally purchased, sometimes before they had even implemented the original system. These concerns highlight the critical need for agencies undertaking such projects to learn from others' experiences. In some cases, agencies have specifically hired project managers with experience working with the intended technology or software to lead their efforts, but agencies should at least communicate with other agencies that have purchased the same technology in the recent past.

Municipal Budget Shortfalls

Municipal budget shortfalls can challenge any project's success. Recruitment initiatives can be especially susceptible because personnel represent the line item most often affected by budget restrictions. Additionally, it can be difficult to pursue a diverse and well-qualified applicant pool when the public is aware that the agency has recently laid off personnel, as Nashville's experience described in Section III illustrates. In Riverside County, California, the Sheriff's Department narrowly avoided the most deleterious effects of a state budget crisis which threatened to undermine its recruiting program. When the Riverside County government froze hiring and asked county departments to reduce their budgets by 8 percent, the sheriff negotiated a flat, rather than decreased, budget and managed to keep personnel. Although positions vacated through retirement could not be filled, the sheriff convinced the Board of Supervisors that positions created through CCI funding should be retained. Other areas of integrity programming such as training and technology also can be compromised if the greater municipality endures a significant budget shortfall.

Recommendations for Law Enforcement Agencies

Overcoming implementation challenges was necessary for CCI projects to achieve their specific program goals. Beyond implementation challenges, it is useful to explore the ways in which law enforcement agencies can best use the strategies developed through CCI programs to facilitate the development of cultures of integrity. Here we provide several recommendations that law enforcement may find constructive when planning for and conducting initiatives to increase organizational integrity in the future.

Think About Integrity, Plan for Culture Change

In the end, the CCI program was about supporting and enhancing a culture of organizational integrity, with each funded strategy a means of achieving this goal. As was discussed in previous sections, providing more information at the beginning of projects concerning the meaning of integrity and factors essential to institutionalizing integrity programs may have assisted grantees in thinking comprehensively about these issues within their organizations. Sites differed in their ability to integrate the programs implemented as part of CCI into the mission and goals of their organization. Several sites implemented more than one initiative and promoted cultures of integrity through multifaceted strategies, with these efforts frequently resulting from agency personnel becoming aware of a promising program rather than as the result of a broader strategic plan for enhancing integrity in an organization. Agencies participating in the CCI program generally were not required to think about the meaning of integrity in the context of their organization and the field of law enforcement. This may not have prevented some initiatives from being implemented successfully, but it may have limited more broadly the outcomes produced by the projects. Working with agencies in the future to think strategically about integrating initiatives within the organization and striving for organizational culture change in specific, measurable ways may increase the overall success and sustainability of various integrity initiatives. To support these efforts, the COPS Office may want to consider developing a description of an integrated integrity initiative that demonstrates how various integrity initiatives fit together for agencies seeking to create a comprehensive and ongoing culture of integrity.

Establish Clear and Measurable Objectives for Integrity

Regardless of which strategy or combination of strategies is put in place, an agency should be able to clearly articulate the objectives of the project and measures that will be used to determine whether these objectives have been met. Typically, the specific measures will vary in the short term, as will the length of time during which agencies can expect to see results (e.g., recruitment strategies will likely take longer than training to demonstrate effects). But by taking the longer view toward organizational integrity, an agency may observe that the desired outcome measures related to culture change look largely the same: decreased excessive use-of-force incidents, fewer complaints of misconduct (especially regarding biased policing), increased transparency of operations and information, more satisfied and representative workforce, and—most important—improved trust and confidence in the police by the local community.

Identify Ways to Involve the Community

In the future, agencies should be encouraged to find ways to involve their local community, regardless of the type of project. Ultimately, the community is the key player in measuring the integrity of an agency, so it seems logical that all efforts to improve the integrity of an agency have some community input. On the surface, some strategies appear to lend themselves more readily to community engagement, but even initiatives that initially seem to affect only the internal organization of the police department (e.g., EIS, training) can provide opportunities to demonstrate positive change to the community. This is not to say that preparatory steps may not be needed, and bringing known contentious personalities into a situation where they have influence on organizational priorities or operations often is not advisable. On the other hand, finding leaders who are willing to do the hard work in spite of legitimate differences with the agency can represent a positive step toward a new productive relationship. It has been the experience of many CCI grantees that allowing the community to see how seriously they take the issue of integrity and the kind of initiatives they are undertaking to enhance their organizations integrity has paid substantial dividends such as increased community trust and confidence.

Maximize Resources Across Agencies

Agencies should also consider ways to maximize the utility of their experiences in the CCI initiative as well as those of other law enforcement agencies. All too often law enforcement agencies think that their local challenges are unique and need to be solved internally. In the trying fiscal environment endured by many agencies, it is not useful to allocate resources to developing a program from scratch when there are many readily available guides or models from which to learn. Likewise, agencies should seek out forums in which to share their experiences implementing various types of integrity initiatives. Using agencies such as the COPS Office and other Department of Justice agencies that provide training and technical assistance, and disseminate current research on police practices can dramatically improve agencies' likelihood of success. As one example, many of the original RCPIs offer training on best practices in the profession that could provide guidance on implementing and sustaining programs to enhance integrity.

As helpful as it is to provide services like program demonstrations for representatives of other agencies, it is important to also acknowledge that this can be a potential burden on agency resources. As the Boston Police Department found during the 1990s with Operation Ceasefire and its related strategies and the Phoenix Police Department experienced more recently in response to its model Early Intervention System, a program perceived as successful can result in an enormous influx of visitors and requests for information. Although it may be difficult to avoid increased costs in personnel and other resources to provide such information to the field, there may be ways to minimize the impact. Both Boston and Phoenix scheduled set specific dates during which their program would be visited and created a unit specifically geared toward this task. These strategies minimized the resources devoted to external visits and made more efficient use of visitors' time.

Publicize Integrity Initiatives

Finally, agencies may want to develop strategies for how to best publicize their efforts. While privacy and other legal constraints affect the agencies' ability to share certain data, keeping the public informed about initiatives to enhance the integrity of an organization will pay large dividends in increased trust and confidence. Many law enforcement organizations fear that by publicizing efforts to enhance integrity they will be admitting to previous deficiencies in integrity in the organization, and ultimately reducing public confidence. This has not been the experience of most CCI grantees. In those jurisdictions where the public was involved in implementing these initiatives or even notified that the agency was implementing these promising practices, the general public reaction has been one of support and appreciation. Decisions about what information will be shared and in what forum are important and should be carefully considered, but this should not dissuade agencies from marketing themselves and their initiatives.

Recommendations for Future Research

Researchers can play an important role in assisting law enforcement to achieve cultures of integrity. Integrity is an important but often elusive concept. Numerous strategies may be adopted to increase specific components of organizational integrity or enhance integrity broadly, but there is little systematic research to evaluate which strategies provide the greatest long-term benefit under different local and organizational conditions. Below, we offer a number of suggestions for how to advance the study of police integrity and maximize law enforcement's success in achieving cultures of integrity.

Operationalize Police Integrity

The concept of police integrity needs to be more clearly defined and operationalized. As indicated in Section II, there is some research from which to draw, but to date few concrete definitions with measurable indicators have been developed. Researchers and police practitioners can combine their efforts to identify a coherent set of indicators that reflect organizational integrity for that individual agency. Partnerships between police agencies and researchers can identify the factors that are indicative of integrity for that organization and put in place a method of measuring those factors regularly. At the beginning of this report, we noted that while many topics in policing are considered controversial, no one in law enforcement questions that integrity should be of

paramount value in his or her agency. Operationalizing this concept at the local departmental level can help remove some of the emotional valence associated with it. Once it is clearly defined and corresponds to specific measurable indicators, it is hoped that the degree to which it is present in an agency will cease to be perceived as an accusation. This process will also emphasize that integrity is not an all-or-nothing characteristic but a dynamic attribute composed of many parts that must be monitored and supported continually.

Researching how other government agencies and organizations in the private sector define and address integrity can inform the operationalization of integrity in policing. The COPS Office can support this important effort by facilitating discussion of the factors that would be indicative of integrity in model police agencies. This process would reflect the wide variety of law enforcement organizations across the country and also could approach integrity as an ongoing goal to be addressed regularly.

Study Agencies' Integrity Needs within their Individual Contexts

Although integrity should be a goal of all law enforcement agencies, researchers and law enforcement will need to critically examine the individual agency's context to determine how this goal should be pursued. It is not a paradox to suggest that integrity is a universal goal within policing but will look different in every agency. As in the implementation of any program, different agencies will by necessity pursue integrity differently because of a huge array of factors including agency size, level of technological sophistication, whether the jurisdiction is urban or rural, the structure of city government, union support, historical interactions with various community constituencies, agency leadership, shifting municipal priorities, and state budget fluctuations. This does not change the goal, rather it simply changes the means of achieving it. Research within individual agencies can contribute to the field's knowledge of how these factors and their interactions mediate agencies' success in achieving integrity-related goals. This will lead to a clearer understanding of what strategies may work best for an agency as well as the most effective combination of strategies and order of implementation.

Enhance Our Understanding of the Role of Midlevel Managers

Previous research has shown the importance of midlevel managers in the development, maintenance, and change of organizational culture (Engel, 2002). Managers' model behavior for the officers reporting to them emphasizes certain policies, dictates how or whether certain procedures are carried out, and generally sets the tone for these officers. Research on the role of midlevel managers can offer important insights into the following questions.

- How do midlevel managers behave when integrity-related initiatives are being developed?
- What effects do their behavior have on the implementation, acceptance, integration, maintenance, and overall success of these initiatives?
- What steps can agencies take to maximize the midlevel managers' support for integrity initiatives and to most effectively persuade subordinate officers to do so, as well?

Since the operation and implementation of cultures of integrity may hinge on the actions and perceptions of midlevel managers, more research is needed to fully understand how managers affect the actions of line officers and the culture of agencies to enhance integrity.

Identify Ways to Use Data for Officers' Professional Development

Officers, particularly line officers, often fear that efforts by agencies to begin collecting information on their activities will be used exclusively for disciplinary purposes. The fact that many police organizations changed terminology from Early Warning Systems to Early Intervention Systems was a result, in part, of this concern. As some of the Early Intervention System grantees found, monitoring an officer's profile for positive behavior can help officers accept the system. Increasing officer buy-in through identifying and officially praising positive action is a useful strategy in and of itself. These practices also illustrate the power that data can offer on a deeper institutional level, both for individual officers and for the organization as a whole. As the early intervention model demonstrates, up-to-date information on an officer's activity can provide a supervisor with insight into whether that officer needs some assistance or additional training. This kind of information could also be used to help supervisors identify officers with leadership potential.

On an organizational level, collectively this information can inform the type and content of future training, identify specific issues for supervisors to emphasize during roll calls, increase officer safety by enabling the agency to assess how successful training programs are in preparing officers for their actual experiences on duty, and highlight where policy changes may be needed. Transparency appears to be the key to addressing the concerns of many officers about such data-collection and management systems. Officers fear policies and practices that are secret. Agencies that have identified the goals of these systems publicly and then regularly, within the constraints of confidentiality, provided updates on how the system is indeed meeting those goals are much more likely to derive officer support.

Conclusion

This report has attempted to assess the performance of 59 agencies that received grants as part of the Creating a Culture of Integrity Initiative from the COPS Office. Throughout the review we found that law enforcement agencies embraced a wide variety of approaches to creating cultures of integrity in their agency. In addition to describing the various types of integrity initiatives and their related strengths and challenges, we have tried to offer some overall framework for assessing the ability of individual agencies to meet their original objectives. We have also offered a number of detailed case studies that we hope will offer promising practices and common challenges for agencies across the country that are considering similar programs. Finally, we have attempted to draw from this wealth of individual information in this initiative some shared benefits and lessons for police, researchers, and ultimately members of the community seeking to create lasting culture of integrity in law enforcement organizations.

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APPENDIX A

CATEGORY	SCORED ITEM	SCORE	EXPLANATION
1. Project Completion.	Was the project completed?	+	The project was fully completed; main implementation goals achieved.
		=	Some or most elements of the project were completed.
		-	Very few or none of the project elements were completed.
		N/A	Project has been granted extension or is ongoing.
	Was the project implemented as proposed?	+	The agency followed the proposal and implemented additional elements not originally proposed.
		=	The agency implemented many or all of the proposed elements.
		-	None or very few of the elements originally proposed were implemented.
	Did the agency submit a final report?	N/A	Project has been granted extension or is ongoing.
		=	A final report to the COPS Office was submitted.
		-	A final report to the COPS Office was not submitted. "Final report" refers to a document describing the agency's implementation, results, and challenges on each major project component. Publications or other documentation that do not include these elements are not considered a final report.
2. Project Integration.	Did the project build on another CCI-related initiative to enhance integrity?	N/A	Project has been granted extension or is ongoing.
		+	The project was built directly on existing integrity initiatives or those currently in development.
	=	The project continues the agency's pursuit of community policing more generally or represents a new effort for the agency.	
	+	The agency implemented a CCI strategy in addition to the one addressed by the grantee's primary strategy area.	
	=	The agency planned to implement a CCI strategy in addition to the one conducted under the grantee's primary strategy area but although efforts were made, it was not implemented successfully.	
	-	Although proposed, no efforts were made to implement this additional strategy.	
		N/A	The agency did not intend to implement an additional CCI strategy.

CATEGORY	SCORED ITEM	SCORE	EXPLANATION
3. Decreasing Officer Misconduct.	Did the project increase monitoring of officer behavior?	+	The project has shown that it has increased monitoring of officers.
		=	Although not shown yet, the nature of the project should produce increased monitoring.
		-	The project was meant to increase monitoring but did not.
	Did the project increase managerial/supervisory accountability?	N/A	The project was not intended to increase monitoring.
		+	The project has shown increased managerial accountability.
		=	Although not shown yet, there is a reasonable expectation due to the nature of the project.
Did the project make positive connections with individuals or groups in the community—instilling trust and confidence through relationships?	-	The project was meant to increase managerial accountability but did not.	
	N/A	The project was not intended to increase managerial accountability.	
	+	The agency involved the community in the project (e.g, involvement on steering committee) or otherwise sought their input (e.g, community surveys, focus groups).	
4. Increasing Community Trust.	Did the project increase communication or transparency about agency efforts to enhance integrity—instilling trust and confidence through information?	=	The agency attempted to involve the community but was unable to.
		-	The agency proposed but did not make any attempt to involve the community; the agency did not plan to involve the community.
		+	The agency took steps to share information about its project efforts with the public (e.g, through reports to, presentations for, meetings with community members, press releases, or other method).
	Did the project increase communication or transparency about agency efforts to enhance integrity—instilling trust and confidence through information?	=	The agency made efforts but was unable to share information about project efforts with the public.
		-	The agency proposed but did not make any attempt to share information about its effort with the public; agency did not intend to share information about its effort with the public.
		+	The agency proposed but did not make any attempt to share information about its effort with the public; agency did not intend to share information about its effort with the public.

CATEGORY	SCORED ITEM	SCORE	EXPLANATION
	Did the agency look to other agencies with experience implementing a similar initiative?	+	The agency conducted site visits, corresponded with agency personnel, or looked to an association or expert in the field.
		=	The agency conducted a literature or online search for information but did not perform the other kinds of activities listed above.
		-	Although originally planned, the agency did not research other agencies' efforts.
		N/A	The agency did not intend to do research on other agencies' efforts.
5. Advancement of Profession.	Did the agency offer anything to other law enforcement agencies (e.g., training, informational via professional conference; materials describing best practices, etc.)?	+	The agency provided a service to other law enforcement agencies (e.g., free trainings, tours of the project for other agencies, free training CD/DVD provided to other agencies).
		=	The agency presented information at professional conferences and/or meetings or made other efforts (e.g., posting information on its web site) but did not perform the kinds of activities listed above.
		-	Although originally intended, the agency did not provide information about this initiative to the larger profession of law enforcement.
		N/A	The agency did not intend to provide information about this initiative to the larger profession of law enforcement.
6. Project Sustainability.	Did the project continue after termination of funding?	+	The agency has continued its efforts.
		=	The agency made explicit plans to continue the project, developed an initiative based on this project, or otherwise provided some indication that the project is likely to continue.
		-	Although originally planned to be sustained, the project will not continue.
		N/A	The agency did not plan to continue the project.

APPENDIX B

Strategy	Agency	1. Implementing the Project			2. Integrating the Project		3. Taking Steps to Decrease Officer Misconduct		4. Increasing Community Trust		5. Advancing the Profession		6. Project Sustainability
		Project Completed	Implemented as Proposed	Final Report Submitted	Built on Previous Initiative	Implemented at Same Time	Increased Officer Monitoring	Made Positive Connection with Community	Increased Communication with Transparency	Looked to other Agencies	Provided Services to Profession	Continued after Funding	
	Austin Police Department	=	+	=	+	+	N/A	+	+	+	+	=	
	Cincinnati Police Department	+	=	=	+	+	N/A	+	+	+	N/A	=	
	El Paso County Sheriff's Office	=	=	=	=	=	=	+	+	N/A	N/A	=	
	Erie County Sheriff's Office	+	=	=	=	N/A	N/A	+	+	+	=	=	
	Jacksonville County Sheriff's Office	+	=	=	+	N/A	N/A	+	+	N/A	=	+	
	Jefferson County Sheriff's Department (CO)	=	=	=	+	+	=	+	+	N/A	+	+	
	King County Sheriff's Office	+	=	=	+	N/A	N/A	+	+	+	+	+	
	Nassau County Police Department	+	=	—	=	N/A	N/A	+	+	N/A	N/A	+	
	Prince George's County Police Department	?	?	?	=	N/A	N/A	?	?	N/A	N/A	?	
	Houston Police Department	+	=	=	+	N/A	N/A	+	+	+	N/A	+	
	Citizen Complaints												

Strategy	Agency	1. Implementing the Project			2. Integrating the Project		3. Taking Steps to Decrease Officer Misconduct		4. Increasing Community Trust		5. Advancing the Profession		6. Project Sustainability
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Strategy	Detroit Police Department	+	=	=	+	+	N/A	=	+	N/A	+	=	Continued after Funding
	Middlesex Co. Sheriff's Office	+	=	=	=	N/A	N/A	=	-	+	+	+	+
	Pinellas County Sheriff's Office	+	=	=	=	N/A	N/A	=	-	+	+	+	+
	Portland Police Bureau	N/A	N/A	N/A	+	N/A	?	?	?	+	N/A	?	?
	Salt Lake City Sheriff's Office	+	=	=	+	+	=	=	+	+	N/A	+	+
	Suffolk County Sheriff's Office	=	-	=	+	N/A	N/A	=	-	-	=	+	-
	Worcester County Sheriff's Office	+	=	=	=	N/A	N/A	=	-	-	+	+	+
	Cleveland Div. of Police	+	=	=	=	N/A	+	+	+	+	+	N/A	=
	Washington, D.C., Metro Police Department	+	=	-	+	N/A	+	+	+	+	+	N/A	=
	Montgomery County Police Department	?	?	?	+	N/A	?	?	-	-	+	N/A	?
	San Antonio Police Department	+	+	-	+	+	+	+	+	+	+	=	+
	Summit County Sheriff's Office	+	=	=	=	N/A	+	+	-	+	=	N/A	+
Data Collection													

Strategy	Agency	1. Implementing the Project			2. Integrating the Project		3. Taking Steps to Decrease Officer Misconduct		4. Increasing Community Trust		5. Advancing the Profession		6. Project Sustainability
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EIS	Chicago Police Department	N/A	N/A	N/A	+	N/A	=	=	-	+	?	?	
	Fulton County Sheriff's Office	=	=	=	+	+	=	=	+	N/A	N/A	=	
	Las Vegas Metropolitan Police Department	=	=	=	+	N/A	=	=	-	N/A	N/A	=	
	Minneapolis Police Department	=	=	-	+	N/A	+	+	-	+	N/A	=	
	Oakland Police Department	=	=	=	+	+	=	=	-	+	N/A	+	
	Phoenix Police Department	+	=	=	+	N/A	+	+	-	+	+	+	
	Salt Lake City Police Department	+	=	=	+	N/A	+	+	-	N/A	N/A	+	
	San Diego Police Department	=	=	=	=	N/A	=	=	-	+	N/A	+	
	Santa Clara County Sheriff's Office	=	=	=	+	N/A	+	+	-	+	N/A	=	
	Seattle Police Department	=	=	=	+	N/A	=	=	-	+	+	=	
	Virginia Beach Police Department	+	=	=	+	+	+	+	-	+	N/A	+	

	Agency	1. Implementing the Project	2. Integrating the Project	3. Taking Steps to Decrease Officer Misconduct	4. Increasing Community Trust	5. Advancing the Profession	6. Project Sustainability
Strategy		Project Completed					
		Implemented as Proposed					
		Final Report Submitted					
IAD Operations	Buffalo Police Department	+	+	+	+	N/A	+
	Charlotte-Mecklenburg Police Department	+	+	+	+	=	+
	New York City Police Department	+	=	N/A	-	+	+
	Pittsburgh Bureau of Police	+	+	+	-	N/A	+
	Fairfax County Police Department	=	+	+	-	N/A	+
Mapping Violations	El Paso Police Department	+	+	N/A	+	N/A	+
	Orange County Sheriff's Office	=	+	N/A	+	N/A	=

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Recruiting	Bergen County Sheriff's Office	+	=	=	=	+	N/A	N/A	+	N/A	N/A	=	
	Franklin County Sheriff's Office	=	=	=	=	N/A	N/A	N/A	+	N/A	N/A	+	
	Harris County Sheriff's Office	+	=	=	=	N/A	N/A	N/A	+	+	N/A	+	
	Hillsborough County Sheriff's Office	+	=	=	=	N/A	N/A	N/A	+	N/A	N/A	+	
	Jefferson County Sheriff's Department (AL)	=	=	=	=	N/A	N/A	N/A	+	N/A	N/A	+	
	Metro Nashville Police Department	+	=	=	=	N/A	N/A	N/A	+	N/A	N/A	+	
	Norfolk County Sheriff's Office	+	=	=	=	N/A	N/A	N/A	+	+	N/A	=	
	Palm Beach County Sheriff's Office	+	=	=	=	N/A	N/A	N/A	+	+	N/A	+	
	Riverside County Sheriff's Department	=	=	=	=	N/A	N/A	N/A	+	+	N/A	+	

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Review Board	Buffalo Police Department	N/A	N/A	N/A	?	?	?	?	?	?	?	?	
	El Paso Police Department	+	=	=	=	N/A	=	=	-	+	N/A	=	
Self-Assessment	Orange County Sheriff's Office	+	=	=	+	+	+	=	-	N/A	N/A	=	
	Baltimore Police Department	=	=	-	+	N/A	=	N/A	+	=	N/A	=	
Use of Force	Boston Police Department	?	?	?	+	N/A	?	?	+	+	?	?	
	Broward County Sheriff's Office	+	=	-	+	N/A	=	+	+	+	=	+	
	Denver Police Department	+	-	=	+	+	=	=	+	+	N/A	+	
	Indianapolis Police Department	+	=	=	+	+	+	+	+	+	+	+	
	Los Angeles County Sheriff's Department	=	=	-	+	N/A	=	+	+	N/A	+	+	
	New Orleans Police Department	N/A	N/A	N/A	+	N/A	?	?	+	N/A	N/A	?	



FOR MORE INFORMATION:

U.S. Department of Justice
Office of Community Oriented Policing Services
1100 Vermont Avenue, N.W.
Washington, DC 20530

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