St. Louis Metropolitan Police Department Administrative Review

Findings & Recommendations

Contents

1   INTRODUCTION

Policing in the City of St. Louis, the state of Missouri—and in fact, the entire nation—is at a crossroads. Law enforcement can continue down the same path or recalibrate efforts to ensure more equitable, professional and just community safety services that give hope to those most in need and afford peace-of-mind and security to residents, businesses and visitors to St. Louis.

In the past, police faced social challenges using the few tools available to them. Arrest seemed the most obvious and easiest way to clear a call for service. Departments measured success by reciting traffic stops, drug seizures and murder rates. Police leadership, communities, elected officials and the media clamored for faster response times and more bodies on the street, rather than acknowledging the true concept of police accountability for community outcomes, which requires a unified strategic vision, time and resources. Today, a half-century of social change has culminated in the current moment of unrest and political, social and economic reckoning. This has taught us that a reactive police response rarely addresses the root cause of criminal behavior. Policing for our current times will instead require prioritization of community outcomes, rather than police department outputs, as well as strategies and tactics that focus not only on enforcement but prevention, intervention and proactive engagement with members of the communities which officers serve.

In light of the ever-increasing pressures that St. Louis faces as a result of the City's and metropolitan region's persistent levels of crime and disorder, members of the private sector approached Teneo Risk to develop an innovative, impactful and systematic public safety initiative. This initiative aims to restore community trust in the public sector; realize a sustainable reduction in crime, disorder, and fear of victimization; and revitalize the City and County's neighborhoods, business districts and reputation. In June of 2020, after agreement on scope, assessment approach and timeline, the Civic Progress companies and the St. Louis Regional Business Council hired Teneo Risk, at no taxpayer's expense, to deliver on the initiative beginning with an assessment of both the St. Louis City and St. Louis County Police Departments. The Teneo Risk team is comprised of leading and nationally recognized public safety experts with decades of experience running complex agencies, turning around crime and disorder, and improving communities across the country.

Based on the information Teneo Risk has collected from discussions with major St. Louis businesses, government, law enforcement and community leaders, as well as the perspective and experience of the law enforcement experts in our team, Teneo Risk developed recommendations tailored to address St. Louis' high crime rates, critical recruitment problems and complex public safety governance and oversight structure. Our assessment program focuses on understanding the priorities and concerns of key public and private sector stakeholders and identifies areas where re-engineering and improved cooperation between the St. Louis Metropolitan Police Department and St. Louis County Police Department will help with delivery of public safety services. The contents of this report highlight key findings and observations based on six months of interviews with various stakeholders within the City Police Department and municipal government, review of policy and procedure documents provided by the department, analysis of department output metrics and local crime data; and recommendations for areas of improvement in the immediate-, medium- and long-term.

This document contains findings and recommendations which can serve as a blueprint for 1) developing and executing on a more strategic, community-focused and data-driven approach to policing and 2) developing and implementing policies and processes that drive greater collaboration across department bureaus; transparent and equitable evaluation of officers' performance and administration of discipline; and greater accountability for serving the community and lowering crime rates. While the SLMPD has been the subject of a number of independent assessments over the past seven years, staffing shortages, persistently high crime rate, changes in leadership, and other internal and external dynamics have hindered the department from implementing the recommendations identified in those reports. With this report, we seek to provide recommendations, along with an actionable pathway forward.

Right here, right now, marks a great opportunity. The City can be a vanguard of national change. By seizing this moment, the City of St. Louis, in cooperation with St. Louis County, and all of the region's stakeholders, can empower communities to work with public safety servants to create a safer, more equitable St. Louis. While no one can change the past, the lessons learned—and actionable strategies gleaned from those measures—can prompt positive change.

However, such a change must be rooted in transparency, accountability and strategic, decisive leadership. Police are part of a wider solution, which includes collaboration across a wide spectrum of private and public entities to create healthy neighborhoods by addressing education, unemployment, social inequity, food insecurity and access to transportation and health services. Because law enforcement represents a cornerstone of any public safety, achieving these objectives will

depend on police departments fostering an internal culture of accountability, integrity, equality and humanity in upholding the law fairly and justly for all.

The findings and analysis included would not be possible without SLMPD personnel and leadership's coordination, candor and generosity of time and insight. Their continued cooperation and assistance in facilitating and participating in interviews, as well as providing policy documents and materials, enabled Teneo Risk to develop an understanding of the each department's areas of success, challenges and future opportunities; identify key findings and recommendations; and work collaboratively with the respective departments to spearhead operational re-engineering and implementation of recommendations going forward. Further, SLMPD employees' awareness around the current social and political climate, as well as their leadership instincts and commitment to the regions and communities they serve attests to both departments' capacity to cultivate and sustain a proactive, strategic approach to policing and crime control.

1.1   Executive Summary

Through the course of our assessment and interviews, we identified district commanders and bureau heads who inherently embraced fundamentals of modern policing and took initiative to implement a more data-driven and collaborative approach. However, staffing levels, resource allocation and distribution, and organizational and governance structures continuously challenge the St. Louis Metropolitan Police Department as it faces persistent violent crime in the City, as well as poverty rates well above that of the rest of Missouri and the US. Senior members of the department have described the agency as being poorly resourced as a result of its 2013 transition from state to City supervision while facing the persistence of violent crime and extreme poverty in pockets of the City.

These internal and external factors, combined with the recent COVID-19 pandemic; resulting quarantine-related staffing shortages; an uptick in protest activity; and ongoing public scrutiny of law enforcement, have only further stretched department personnel, demanding long hours in tumultuous conditions and drawing officers away from their usual beats to address local protests. The deaths of two officers and injuries of ten others in the line of fire this year have added to these burdens, dropping morale to what many interviewees characterized as an unprecedented low and instilling in officers a fear of the scrutiny they may face for performing routine responsibilities.

Given the complexity of these challenges, the Teneo Risk team has identified three overarching areas of opportunity which can set the tone for department-wide programs across five domains we examine below: 1) department culture, 2) resource allocation, 3) crime fighting strategies, 4) tools and technologies, and 5) communication.

St. Louis Crime Landscape and Challenges

St. Louis has consistently been ranked among the most dangerous cities in the United States. In 2018, the City of St. Louis had the highest murder rate per 100,000 people for a large city, and rates of aggravated assaults have been far higher in St. Louis than other US cities. Based on the City population from the 2010 Census, the 2018 homicide rate for the City of St. Louis was 58.3 per 100,000 residents, and in 2019, the rate was 60.8 per 100,000 residents—an increase of 4.3%. Similarly, St. Louis also witnessed an increase in aggravated assaults with a gun. In 2019, there were 2,537 aggravated assaults with a gun, an 8.8% increase over 2018's figure of 2,332 such incidents.[1] As of December 6, 2020, St. Louis witnessed 247 murders, giving it a homicide rate of 84.3—17% higher than its most violent year in 1993.[2] Further complicating the City's unprecedented number of homicides is the department's solve rate, which is less than 25% compared to the national average of 60%.[3]

Like many other cities, a small percentage of people commit a disproportionate amount of crime and do so in a concentrated area. To address this, Chief Hayden implemented a Violence Reduction Zone in the northern corner of the City in 2017, known as "Hayden's Rectangle" or "Hayden's Triangle." The area, comprised of the neighborhoods most seriously affected by high crime in the City's Sixth District, is bounded by Dr. Martin Luther King Jr. Drive on the south, West Florissant Avenue on the north, Vandeventer Avenue on the east and a line just west of Goodfellow Boulevard on the west. From 2017 to 2018, the area encompassing Hayden's Rectangle showed an 18% reduction in violent crime. However, when the department attempted to expand this crime-fighting tactic beyond the Sixth District, a lack of resources and communication limited its success as a department-wide strategy. In the absence of broader consideration around how best to extend the same crime-fighting tactics

[1] https://metrostl.com/2020/02/12/in-homicides-there-are-two-cities-of-st-louis/

[2] https://www.ksdk.com/article/news/investigations/st-louis-homicide-rate-breaks-record-amid-covid19/63-60aa0060-e4bf-42a3-a0b0-4c46043b1d78

[3] https://www.stltoday.com/news/local/crime-and-courts/amid-indescribable-times-st-louis-homicide-rate-reaches-historic-levels/article_97b57246-ae07-5f93-b42a-b5f57fc15c8e.html

to a larger area, Hayden's Rectangle no longer afforded the appropriate flexibility to account for crime displacement to other areas, as well as changing crime drivers over time.

Discussions with multiple members of the department revealed gaps in the department's execution of this crime plan: specifically, lack of regular evaluation of its progress; the absence of a strategic approach toward staffing and resource allocation; and lack of systematic information and intelligence-sharing. According to interviewees, emphasis on Hayden's Rectangle has either decreased over time or has resulted in a disproportionate targeting of resources towards this area and, in turn, overlooked other areas where crime has since surfaced. COVID-19 has further challenged the effectiveness of the expanded crime-fighting tactics. While overall crime in the City was down about 1% during the period from January to September 2020, violent crimes against people, to include homicide, rape, robbery and assault, were up 90% downtown, compared with the same period last year.[4] Aggravated assaults were up more than 9%, and auto theft rose more than 7%.[5] St. Louis state and local agencies received support through Operation LeGend, a program deploying 1,000 federal agents and tens of millions in funding to US cities—resulting in 828 arrests, 359 gun seizures and 357 federal charges in the area.[6] However, Operation LeGend is a temporary crime-fighting measure rather than a sustainable model.

Compounding the disparities in resources and demographics across different areas of the City, its most impoverished neighborhoods tend to experience the most crime, making how law enforcement engages with those neighborhoods critical in preventing crime.

Much of St. Louis' poverty is concentrated in the area north of Delmar Boulevard, the thoroughfare that runs east to west from the municipality of Olivette, Missouri, into the City, and that represents a socioeconomic and racial dividing line. Known colloquially as the "Delmar Divide," the Boulevard became a boundary due to Jim Crow-era housing covenants; according to 2014 Census Bureau estimates, the City neighborhoods directly north of Delmar Boulevard are 99% African-American, while the City neighborhoods south of it are 73% white. North of Delmar Boulevard in the City, the median annual household income is $18,000, while the median income south of the Divide is $50,000. Owing much to the conditions of neighborhoods plagued by vacancy, historically systematic disinvestment and disorder, the City's Health and Safety Equity Survey indicated African-American residents are 2.5 times more likely as white residents to be a victim of violent crime.[7]

The worsening impact of the COVID-19 pandemic during the latter half of 2020 has also posed an obstacle to the department. In late November, officers and union representatives reported that nearly 10% of officers in the Central Patrol Division were out with positive tests. However, in the North Patrol Division, more widespread adoption of health security measures, such as outdoor roll calls, temperature checks, and cleaning of cars before and after each shift, has been credited with leaving the workforce largely spared.

Effects on Law Enforcement

As a result of persistently high crime rates, generally concentrated in the northwest part of the City, the department finds itself chronically reactive to incoming calls for service, struggling to maintain sufficient numbers of officers on patrol, and lacking the resources to implement more community-based policing.

Members of the department interviewed unanimously attribute the issues in recruitment, retention and resourcing to the transfer of department control from the state of Missouri to the City and resulting misalignment between department needs and operations and City processes. The SLMPD has been under City supervision since 2012, when Proposition A, a City referendum to transition the department from state to City oversight, received overwhelming voter support in the hopes of increasing transparency and efficiencies between City and department logistics and communications. Chief John Hayden Jr. is the second police chief of the SLMPD since the City government gained police oversight and absorbed the duties of some of the department's divisions, including human resources, purchasing and other administrative functions. However, these critical areas are unique from other municipal services, resulting in a disconnect between the department and City officials. As a result, department employees feel they lack the staffing and resources to address, investigate and prosecute violent crime and to engage in more proactive crime-fighting. City officials, on the other hand, express that they have made recommendations

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[4] https://www.stltoday.com/news/local/crime-and-courts/as-crime-surges-st-louis-downtown-seen-as-increasingly-lawless/article_99e44fae-004c-5fff-9e42-c70d34f8f23b.html

[5] https://www.kmov.com/news/overall-crime-in-st-louis-city-is-declining-violent-crime-is-on-the-rise/article_dc83626e-ef1b-11ea-be03-9ff540e609e4.html

[6] https://www.kmov.com/news/357-arrests-made-as-part-of-operation-legend-in-st-louis/article_d7b28d60-fd8e-11ea-a48b-c7fa7a2fcebb.html

[7] https://www.stlouis-mo.gov/government/departments/mayor/initiatives/resilience/equity/documents/upload/Equity-Indicators-Baseline-2018-Report-Document.pdf

and improvements intended to streamline the department's recruitment, hiring and promotions process and lower barriers to entry. While a state law signed in September 2020 lifted the residency requirements for police officers (and firefighters) hired before September 1, 2023, City voters in November rejected a change to the City Charter that would have made the residency requirements permanent. The November election result renewed concerns cited by many within the department that St. Louis lacks quality public schools, housing and other infrastructure for potential job candidates and their families that hampers recruitment efforts. Interviewees also cited the City's inability to compete with salaries for comparable jobs offered by surrounding jurisdictions, and the ongoing freeze on the promotion process as additional challenges surrounding recruitment and retention. On the other hand, City representatives highlight changes they have implemented in the hiring process designed to increase the volume and diversity of the candidate pool and shorten the timeline from recruitment to onboarding. Budget constraints represent another challenge for the department in acquiring the tools and resources necessary to streamline policing operations.

Perceived staffing shortages and a reactive approach to crime-fighting mean that enforcement comes at the expense of community policing—a critical component and best practice in fostering partnership between communities and public safety—as well as a more strategic and data-driven approach to crime reduction and departmental operations. Some interviewees cited a reduction in or lack of uniform implementation of community outreach programming across districts, as well as a lack of time on patrol for interacting with the community and initiating self-directed activity outside of responding to calls for service. Others cited potential generational differences in officers' tendency to build rapport within their districts. While staffing is such that the same officers handle beats consistently within a given district, some noted that younger officers may be less likely to engage with community members on a regular basis, and collectively, the department's focus on responding to calls may create a perception among St. Louis residents that the police are heavy-handed in crime enforcement without contributing to any improvements in overall quality-of-life issues, or that officers are not trustworthy or invested in serving the public.

Findings from our policy and procedure review further substantiated a lack of strategic focus, accountability and transparency, particularly as related to use-of-force—primarily specific to Taser usage. Given the current climate, the repercussions of excessive use-of-force are likely to be the most impactful. We have noted recommendations for policy and procedure development in the relevant domain sections, with an appendix dedicated to specific comments to the use-of-force policies, given heightened public scrutiny in the current climate.

Despite the complexity of the challenges facing the department, the Teneo Risk team heard from across the ranks the deep desire to improve the department's crime-fighting abilities through improved intelligence, strategic planning, targeted policing and community collaboration. As such, we provide three main areas of opportunity. The rest of the report provides additional contextual detail and observations relating to each area of improvement across the domains and more specific recommendations to implement systematic change.

▌Teneo has identified three major thematic areas, targeting immediate opportunities for improvement:

1. **The department should consider reorganization of personnel, bureaus and specialized units to maximize efficiencies leveraging existing resources.**

2. **The department should create and implement a more data-driven, community-focused, long-term crime-fighting strategy.**

3. **The department should empower the chief to select senior personnel, predicated upon the needs of the department, and to develop a forward-looking strategic plan for the organization. To the degree there are institutional or organizational impediments to doing so, those should be evaluated and rectified.**

In addition to describing the findings and observations that led us to identify these high-level thematic areas, this report also outlines key strategic and tactical recommendations to address them. We separate our findings, observations and recommendations into five domains: cultural diagnostics, resource allocation, crime control strategies, tools and technologies and communications.

2   PURPOSE

The purpose of this report is to present and prioritize a holistic range of actionable opportunities for the St. Louis Metropolitan Police department and provide a guide for implementation of those recommendations. These recommendations and guidelines aim to help the SLMPD reduce crime, improve internal and external relationships, increase community trust in the City police department and achieve long-term crime reduction.

The structure of this report starts with the methodology Teneo Risk has employed over the course of this assessment, followed by our findings and recommendations based on what we perceive to be areas to realize greater efficiencies near-term, as well as more fundamental issues necessary to affect long-term change.

Following the section on actionable opportunities, we provide a deeper analysis of our findings against five domain areas as part of our overall assessment program:

- Cultural Diagnostic
- Resource Allocation
- Crime Control Strategies
- Tools & Technologies
- Communications & Public Information

While we designated these domains as separate sections of our assessment, we note that they are highly interdependent, and implementation of the recommendations in one domain is integral to the implementation and success of those in others. Specifically, the issues identified in the Cultural Diagnostic section reflect a number of the organizational dynamics that contribute to the perception of a lack of accountability and transparency by both officers and community members, as well as the view that the department responds reactively to all calls for service, at the expense of affecting more systematic reductions in crime throughout the City. The recommendations in each of the following sections are designed to help affect organization-wide changes that increase transparency, accountability and fairness both in internal processes and community service, and also help the department to transition from "fire-fighting" mode to proactive, strategic and community-based policing.

For instance, the recommendations around organizational structure in the Resource Allocation section are designed to ensure the department has the personnel and oversight necessary for development and implementation of crime control strategies. The recommendations in the Tools & Technologies section aim to ensure that personnel have the technological capabilities and infrastructure, as well as access to relevant output metrics, to execute and evaluate crime control and community policing initiatives. Finally, the recommendations in the Communications & Public Information section provide the basis for communicating strategic changes, new technology programs and other departmental initiatives.

3   METHODOLOGY

The St. Louis City Teneo Risk team utilized qualitative and quantitative methods to review and evaluate policies, processes, practices, and perceptions within the SLMPD. These methods included a document review and analysis of SLMPD policies, procedures and operations; as well as in-depth interviews with members of the SLMPD leadership team, command staff, bureau heads and patrol staff, members of the St. Louis City municipal government Personnel Division, Mayor Lyda Krewson and members of the local business community. Teneo Risk also undertook an analysis of crime data in the St. Louis metropolitan area, utilizing SLMPD crime reports, overlaid with Census data, neighborhood and block group attributes, to understand the geospatial distribution of crime throughout the region.

In addition to the interviews and document reviews, the Teneo Risk team conducted a more in-depth document review, as well as in-person observations during a visit to St. Louis in September 2020 to augment and further elaborate on the information for this report and to build out the same level of detail for counterparts in the domains of Resource Allocation and Tools & Technologies.

SUBJECT MATTER EXPERT TEAM

The assessment team is made up of a small group of highly experienced police leaders who have led or been part of comparable-sized jurisdictions. These experts used their experience, knowledge, and skill to make the observations and recommendations contained in this report. The SLMPD assessment team is comprised of:

- Courtney Adante, Program / Client Lead, *President, Teneo Risk*

- Charles H. Ramsey, SLMPD Assessment Oversight; *Former Commissioner, Philadelphia, DC Metro, Deputy Superintendent, Chicago Police Dept.*

- Paul Evans, SLMPD Assessment Oversight; *Former Commissioner, Boston Police Department*

- Jonathan Wackrow, SLMPD Assessment Lead; *Chief Operating Officer & Global Head of Security for Teneo Risk, Former Senior Special Agent, US Secret Service*

- Lauretta Hill, SLMPD Assessment Team Member; *Chief of Dallas College Police Department, former Deputy Chief, Miami Beach, Assistant Chief, Arlington (TX)*

- Judy Pal, SLMPD Assessment Team Member; *Former Asst. Commissioner, NYPD; former Chief of Staff, Baltimore & Milwaukee PD, Communications Lead, Atlanta, Savannah, and Halifax (Canada) Police*

- David Cagno, Collaboration Lead; *Senior Vice President, Teneo Risk, Former Lt. Commander, NYPD*

- Kathryn Llewellyn, SLMPD Assessment Project Manager; *Vice President, Teneo Risk*

City Team Lead: Charles H. Ramsey

Charles H. Ramsey served as the Police Commissioner of the Philadelphia Police Department from his appointment in January 2008 through retirement in January 2016. During his eight-year tenure, he led the fourth largest police department in the nation, with over 6,600 sworn members and 800 civilian members. As Police Commissioner in Philadelphia, Chief Ramsey developed and implemented an aggressive reduction in violent crime through targeted policing initiatives, as well as worked to improve organizational and policy infrastructures to support such initiatives. At the end of 2008, homicides had dropped 15% in 2008, shooting victims have decreased by 10%, and the homicide clearance rate is the highest in over a decade at 75%.

Commissioner Ramsey brings the knowledge and experience of over forty years in the law enforcement profession and service in Chicago, Washington DC, and Philadelphia police departments. A native of Chicago, Illinois, Commissioner Ramsey served in the Chicago Police Department for nearly three decades in a variety of assignments, beginning his career in 1968 as a Chicago Police cadet. He became a police officer in February 1971, and was promoted through the ranks, eventually serving as commander of patrol, detectives, and narcotics units. In 1994, he was named Deputy Superintendent of the Bureau of Staff Services, where he managed the department's education and training, research and development, labor affairs, crime prevention and professional counseling functions. Prior to his appointment in Philadelphia, he served as the Chief of Police of

the Washington, DC Metropolitan Police Department from 1998 to 2006. Ramsey was the longest serving chief of the Metropolitan Police Department since DC Home Rule and the second longest serving in the Department's history. Under then Chief Ramsey's leadership, the Department regained its reputation as a national leader in urban policing. Crime rates declined by approximately 40 percent during his tenure, community policing and traffic safety programs were expanded, and MPDC recruiting and hiring standards, training, equipment, facilities, and fleet were all dramatic upgraded. He also oversaw and participated in numerous high profile investigations and events in Washington DC, such as: The 1998 murders of two United States Capitol Police officers inside the U.S. Capitol Building; The Y2K National Celebration in Washington, DC; The International Monetary Fund/World Bank Protests in April, 2000; The Chandra Levy Murder Investigation, The 9/11Terrorist Attacks, The 2001 Anthrax Attacks; The 2002 DC Sniper Investigation; The funeral of President Ronald W. Reagan and the 2001 and 2005 Presidential Inaugurations.

In December 2014, President Barrack Obama appointed Commissioner Ramsey to serve as co-chair of the President's Task Force on 21st Century Policing. He currently serves as an advisor to the United States Conference of Mayors as a Distinguished Visiting Fellow of the Lindy Institute at Drexel University and serves on the National Infrastructure Advisory Council. In December 2015, the City of Philadelphia named the Philadelphia Police Department Training Academy Auditorium the Charles H. Ramsey Training and Education Auditorium in his honor. Commissioner Ramsey has lectured nationally on community policing and is viewed as an expert in policing and homeland security. He currently serves as President of the Police Executive Research Forum, First Vice President of the Major Cities Chiefs, and is a member of the Executive Committee for the International Association of Chiefs of Police. He now serves on the National Advisory Council for the Federal Emergency Management Agency (FEMA), comprising experts in the field of emergency preparedness, management, and response.

Commissioner Ramsey holds both Bachelor's and Master's degrees in criminal justice from Lewis University in Romeoville, Illinois. He is a graduate of the FBI National Academy and the National Executive Institute. After his retirement from the Washington DC Police Department, he served as a member of the Independent Commission on Security Forces of Iraq, led by now National Security Advisor General James L. Jones, and led the group of law enforcement professionals that reviewed the Iraqi police forces which garnered international attention for their work. He completed the Executive Leadership Program at the Naval Postgraduate School, Center for Homeland Defense and Security in February 2008.

The team is also drawing on the vast experience of Commissioner William J. Bratton, Executive Chair of Teneo Risk, and Chief Scott Thomson, former Camden, NJ Chief, for guidance and input to the overall observations and recommendations.

INTERVIEWS

The team has conducted more than 50 individual virtual and in-person interviews, including discussions with Chief Hayden, members of the SLMPD command staff team, district commanders, bureau heads and members of the St. Louis City municipal government, including Personnel and Legal staff and other key stakeholders. To supplement the virtual interviews conducted from June through November, Jonathan Wackrow held in-person meetings and ride-alongs with members of the district command staff and patrol office. Some interviewees were contacted more than once for clarification and further information. The team also spoke with various heads of federal law enforcement agencies, and local community leaders.

DOCUMENT REVIEW

This report includes observations drawn from the Teneo Risk team's review of documents covering the areas of organizational structure and staffing; general department policies and processes; resource allocation and budget; crime data; officer roles, responsibilities and performance; training and continuing education; and communications and public information. The Teneo Risk team also undertook a comprehensive review and analysis of departmental outputs, to include call for service volumes by district; response times; clearance rates; and patrol staffing by district. The team then evaluated departmental policies and procedures, organization and staffing, resource allocation, training and communications and public information policies based on their alignment to industry standards and best practices, as well as their effectiveness relative to departmental output metrics.

4   FINDINGS & RECOMMENDATIONS

As noted above, the COVID-19 pandemic's economic, social and political fallout, associated protest activity and upticks in violent crime have exacerbated St. Louis' historically high crime rates. St. Louis' 2017 permitless carry law has also contributed to rising rates of gun-related crimes. In January 2017, Missouri became the 13th state to allow individuals 19 years of age and older and legally allowed to own a gun to carry a concealed weapon without a permit. Missouri is now among 15 states nationwide to enact permitless carry, which has further strained St. Louis City law enforcement's ability to respond to a heightened volume of shots-fired and gun-related crimes. Facing rising crime, combined with heightening pressures of public and media scrutiny in the wake of instances of police violence and protest movements, officers at all levels of the department have noted feeling inhibited in their ability to undertake proactive police work. COVID-19 also significantly impacted proactive policing efforts; as a result of a high number of officers contracting COVID-19, department leadership advised officers to limit engagement with citizens to the extent possible. These challenges, in combination with staffing shortages due to a volume and pace of recruitment that has not kept up with already-low retention rates, has resulted in what multiple officers characterized in interviews as an unprecedented low in overall morale.

A number of pre-existing internal challenges around leadership, organizational structure and resource allocation have compounded the external challenges facing the department. Since the mid-point of our assessment work in September 2020, the department has undertaken a number of initiatives aimed to achieve greater automation and efficiency and raise the SLMPD to the level of other large, urban police departments. Most notably, the implementation of a body-worn camera (BWC) program in November 2020, as well as the implementation of the SwiftProtect records management system (RMS) targeting 2021 completion, represent two of the most significant advancements underway. However, in the absence of an organization-wide crime strategy, the organization risks that it may not utilize these new and more advanced capabilities to their maximum potential.

Consequently, our findings and recommendations emphasize development of a strategic vision and plan, to inform deployment of the department's existing resources and new tools and technologies. Doing so will, in turn, enable more proactive, impactful and data-driven community patrol and promote greater accountability across all levels of the organization. Interviews, as well as our review of departmental outputs, attested to the operational impact that a lack of overarching strategic plan or crime strategy has. Overall, this has resulted in an organization-wide mentality of "no call too small," in which officers view their primary role as responding to all incoming calls for service and recording each incident, rather than utilizing patrol time to respond to calls where police intervention would have the greatest impact.

For instance, multiple interviewees noted the existence of an informal plan to focus resources and attention on an area of high-crime the northern part of the City known as "Hayden's Rectangle" or "Hayden's Triangle." However, when asked directly if they were aware of a formalized crime plan, none of the interviewees expressed definitive awareness. In fact, the difference in terminology used within the department itself to refer to the crime reduction zone reflects the broader lack of department-wide coordination. Interviewees noted that emphasis placed on policing Hayden's Rectangle has decreased over the years. Additionally, many reported the unintended consequences of focusing resources of an already-short-staffed department so heavily on Hayden's Rectangle. Others cited additional gaps resulting from the relatively informal implementation of the crime-fighting plan—to include information and resource-sharing; a CompStat program focused more on recitation of events rather than solutions-based dialogue; and, consequently, an emphasis on responding to calls for service, rather than more proactive patrol and unified community policing in support of the community.

Without a clearly communicated crime plan, the agency is constantly in "fire-fighting" mode, leading to officer burn-out and persistent rates of crime and disorder. In addition to, and partially because of, this reactive approach, SLMPD leadership is caught up in the present and has not been able to take the time necessary to plan for the future. Some officers also expressed a perceived lack of cohesion at the executive level.

According to interviewees, this has manifested in lack of regular top-down and bottom-up communication. Other interviewees also cited a lack of clarity in chain-of-command, revealing a level of ambiguity or uncertainty around who is serving as incident commanders during demonstrations and whose responsibility it is to make the call to deploy munitions, as well as uncertainty about who is charged with conveying information from the chief's office to other members of the senior command staff and rank-and-file. This lack of clarity in lines of communication and chain of command hampers an agency's ability to progress and to oversee systematic change. In the context of implementing, evaluating and socializing a strategic crime plan, for instance, two-way communication between leadership and personnel, as well as unity and cohesion among the leadership staff in their

vision and messaging, are critical. As the example of Hayden's Rectangle attests, successfully extending a tactic that has proven effective into a City-wide strategy may fall short in the absence of a clear and unified vision.

The department also faces external budgetary and workforce constraints as a result of civil service rules and the current political, social and public health challenges. These constraints make optimization of the department's existing resources even more critical to increasing individual accountability across the organization; to freeing up more time for proactive patrol; and to ensuring that the department undertakes new requests for headcount based on identified community needs. Thus, the "Resource Allocation" section of this report serves as the foundation for the recommendations in the "Crime Control Strategies," "Tools & Technologies" and "Communications & Public Information" sections. The observations and recommendations set forth are designed to enable development and implementation of strategic plans for the department and City crime reduction that emphasize a long-term focus on community-based policing, more strategic deployment of technology, and more widespread usage of data to inform policing.

We also recognize that managing the daily operations of personnel who are reacting to constant and compounding external stressors leaves little bandwidth for more long-term strategic planning and implementation of those plans. Thus, we have designed our recommendations to be as tactical and operational as possible and to more narrowly focus the chief's purview to ensure that he can provide strategic leadership and oversight of key strategic initiatives at all levels of the department. To support the chief in doing so, we have also recommended the appointment of a chief strategy and implementation officer, charged with working closely with the chief and other department leadership to develop and implement both a crime plan and strategic plan, and a chief equity officer, charged with ensuring that new initiatives and personnel-related processes are carried out fairly.

Underlying all these recommendations are three key, thematic areas of opportunity, which we have further developed in the second half of our assessment. Given the persistently high crime within the City, 2020's record-breaking number of homicides, heightened demand for protest coverage, recruitment, and retention challenges, we identified these areas for the foundation of developing and executing on strategic crime reduction and organizational plans. They represent pathways for strengthening the agency's community policing and crime-fighting abilities.

1. **The department should consider reorganization of personnel, bureaus and specialized units to maximize efficiencies leveraging existing resources.**

   The department's current organizational structure is highly specialized, and supervisor roles could be re-allocated to provide greater support for patrol. Currently, decisions around staff allocation focus on not removing patrol from the streets and often appear to be based on the respective district commanders' personal relationships and individual strategies for addressing incidents in their districts. As a result, multiple interviewees perceived a lack of support; a need to independently form relationships with individuals within particular specialized units in order to get access to information and resources; and a tendency to carry out all strategic and tactical aspects of crime-fighting independently. Interviewees also alluded to a high degree of redundancy between specialized unit functionality and work undertaken by district staff; for instance, the Intelligence Unit appears to focus a significant amount time on warrant enforcement, which the Anti-Crime or Special Operations teams might be able to support, in turn, enabling Intelligence to focus on its core functionality.

   Streamlining resource allocation will ensure the department is utilizing the staffing resources it currently has before it looks to undertake additional hiring or seek to change current hiring processes with the City Director of Personnel.

   To that end, we have provided an illustrative, preliminary organizational chart, designed to consolidate the specialized units. The proposed structure also aims to bring greater focus to the areas with direct oversight by the chief, elevate the role of the Real Time Crime Center (RTCC) and Crime Analysis Unit (CAU) and position community patrol as the department's central mission. The chart also reflects the creation of two new roles for a chief strategy and implementation officer, as noted above, and a chief equity officer. The former role is designed to support the chief in the development, implementation and execution of strategic initiatives and daily departmental operations aligned to those initiatives. The latter will oversee accountability, objectivity and fairness in the outcomes of all department recruitment and hiring, promotions, discipline and evaluation processes. We have also recommended the designation of a department liaison to the City Director of Personnel to facilitate greater alignment between the department and municipal government.

2. **The department should create and implement a more data-driven, community-focused, long-term crime-fighting strategy.**

   As multiple interviewees attest, when a department's strategy depends overly on personnel to respond to every call for service, a shortage of officers quickly equates to an increase in crime. Putting in place a strategic crime plan, focused on crime intelligence and proven practices for investigative and enforcement tactics, can be a force multiplier and help change this paradigm. Conversely, while the SLMPD is dependent on personnel to fight crime, it is overly reliant on geography to address it. Focusing efforts in hotspot areas is most successful when paired with a strategy to arrest the core group of criminals responsible for a disproportionate amount of crime. Based on the information shared in interviews, we understand that the Intelligence Unit, Crime Analysis Unit (CAU) and Real Time Crime Center (RTCC) compile and disseminate a range of information, including profiles and link analyses of the City's most violent individuals, trends and suspects in gang and youth crime, reports on aggravated assaults, as well as notifications from ShotSpotter, license plate readers (LPRs) and surveillance cameras deployed throughout the City. Districts also disseminate reports at the conclusion of daily and nightly shifts. However, utilization of this information varies between officers and districts. Additionally, the emphasis on targeting resources to Hayden's Rectangle or other crime hotspots has created the need to focus more attention on the City's top violent criminals. For instance, one interviewee noted that by focusing on the most violent offenders, he felt that the department could not only lower the homicide rate but also the rate of more minor offenses committed throughout the City.

   Implementing a more systematic and strategic crime plan would create the infrastructure for standardizing intelligence-sharing and more solutions-based policing. Aggregating information on the City's top "most wanted" suspects on a regular basis and distributing it across the entire staff can enable the department to target both people and locations. A strategic crime plan could also drive crime prevention and intervention, realizing improvements in quality-of-life and disorder in the neighborhoods most affected by crime.

   For instance, coordinated City improvement of neighborhood infrastructure could help to improve relations with community members and set the stage for more widespread collaboration and community engagement by countering the perception of heavy enforcement with actual improvements in quality-of-life issues.

   Additionally, the SLMPD may look to explore more diverse means of prevention and intervention in crime, in collaboration with local non-profits and community organizations. For instance, each district station house may consider having licensed clinical social workers, funded by non-profits, if possible. Station commanders could, in turn, work with social workers to identify families that are generationally involved in crime and provide comprehensive plans, as well as other social services, to address the families' needs. By bringing these agencies together, rather than having them continue to operate in siloes, both the SLPMD and City can provide more effective public service.

   As noted previously, streamlining the allocation of the department's existing personnel and technology resources will be critical to implementation of an impactful crime-fighting strategy. Thus, adoption of an organizational chart that prioritizes community patrol functions and equipping of command staff with the intelligence they need to identify repeat, violent offenders will be critical to lowering crime rates. Technology can also support the implementation of a more data-driven, community-centered crime-fighting strategy by automating the collection, distribution and audit of departmental output metrics and community crime information, thereby increasing accountability, reducing administrative activities that consume officers' time, and potentially freeing up time for more proactive community engagement.

3. **The department should empower the chief to select senior personnel, predicated upon the needs of the department, and to develop a strategic plan for the organization.**

   Multiple interviewees cited lack of cohesion at the department's top level as affecting its operations, underscoring the need for greater empowerment of the chief to serve as the single visionary and voice of the department, as well as an overarching forward-looking strategic plan. Generally, commanders perceived a relative lack of communication from the chief and executive leadership. Multiple interviewees also cited discord amongst senior leadership as driving an overall unwillingness to collaborate. These personal and professional conflicts distract from the mission of public safety.

This lack of unity and communication may transcend the department's daily operations and response. For instance, one interviewee noted a lack of clarity around chain of command and accountability in the deployment of munitions, calling into question accountability and differentiation of roles and responsibilities when responding to critical incidents.

One supervisor stated that everything seemed to be reactionary to either politics or the media, which has affected morale and motivation to engage in proactive work. Some feel that if they try to make a difference, they may end up being "criticized, indicted, or fired." By enabling the chief to select senior personnel based on organizational needs, the chief benefits from having an organizational structure that affirms his role as the department's leader. Structural or other institutional restrictions—whether due to the hiring authority or the hiring process under local and state law—should be evaluated and remedied to allow the chief to make his own senior personnel selections. The proposed changes in the department's organizational structure, detailed in the "Resource Allocation" section, serve as a starting point for providing the chief these resources. Specifically, the designation of a chief equity officer and a chief strategy and implementation officer will allow the chief to appoint individuals best positioned to help him advance a culture of greater accountability and administer key strategic initiatives. Additionally, shifting a number of bureaus from the chief's purview into the assistant chief's remit will enable the former to shift from more reactive, day-to-day operational oversight to focus on strategic planning.

4.1   Key Findings & Recommendations

To further operationalize each of the five thematic areas, we provide below a prioritized list of our top 10 more tactical recommendations. Then, in the following sections, "Cultural Diagnostic," "Resource Allocation," "Crime Control Strategies," "Tools & Technologies" and "Communication & Public Information," we provide a more detailed breakdown of findings, specific to each of these domains. We have also provided a full roadmap for implementation and evaluation of these recommendations.

FINDINGS

1. The City government's Department of Personnel and SLPMD have disparate viewpoints on the effectiveness of the recruiting and hiring processes. While the City Personnel representatives cite changes they made in the recruitment process as helping to streamline the hiring process, interviews with members of the department cited ongoing challenges—namely, numerous open positions, hurdles recruiting African Americans, and attrition among the staff they do have. More broadly, organizational structure and staffing does not appear to be based on current department needs but more upon legacy reporting structures and reliance upon individuals' capabilities.

2. The department currently lacks a widely recognized and utilized platform for proactively disseminating intelligence and relies on informal information-sharing between district command staff and between district command and specialized units. While each district currently distributes morning, afternoon and evening reports; the Crime Analysis Unit (CAU) distributes a weekly report on shootings, homicides and possible connections between them; and the Intelligence bureau puts out a weekly aggravated assault and homicide update, interviewees lack consensus on who receives such briefings and how widely they are utilized. Additionally, in early 2020, the CAU unrolled a dynamic crime dashboard, where statistics by district are available to all department personnel in real-time. However, usage of that tool appears to be similarly uneven across districts and units, in part due to COVID-19's interference in training.

3. The SLMPD also lacks a formal platform or process for exchanging intelligence within the department. While officers had organized and attended weekly meetings, they have ceased due to COVID-19 health precautions. Furthermore, these meetings did not appear to reflect a mandate from department leadership but instead arose from more informal interaction through the Homicide and Intelligence teams to address a known gap in information-sharing and problem-solving. Though interviewees characterized these meetings as useful and productive, the level of formalization or regularity in information-sharing appeared to be the exception rather than the norm; resourceful officers glean information through their personal networks rather than a systematic information exchange.

4. The department's current crime strategy is relatively informal, lacking a coordinated, department-wide methodology to reduce crime but instead relying upon individual commanders and their staff. While the Hayden's Rectangle area has historically contained a high volume of violent crime, the current strategy does not present a means for holding accountable the most violent individuals responsible for a disproportionate amount of crime.

5. The department's current use-of-force policies, frequency of Taser usage, as well as the quality of use-of-force investigations call into question supervisors' level of accountability, as well as the quality and transparency of investigative practices. Given the current climate, industry standards and the instances of Taser, stun gun and nightstick / extendable baton usage are of concern. In each category, the frequencies per year have decreased since 2019. However, the numbers remain high, especially for Tasers. In combination with the policies' lack of explicit prohibition around use-of-force and prioritization of de-escalation tactics, these numbers merit further review into the officers who are utilizing force, particularly Tasers.

6. Consistent with potential gaps in supervisor accountability and oversight around use-of-force, the department's personnel policies as well as the current lack of an early warning system (EWS) pose a challenge to greater accountability for both officers and supervisors. Officers at all levels of the department perceive that the discipline system lacks transparency and allows for uneven application of discipline based on existing personal relationships. While Chief Hayden's recent reliance on the civil service system has promoted a greater sense of fairness, the terms of the Collective Bargaining Agreement (CBA) have led to disparities in the disciplinary process, leaving loopholes for officers to circumvent standard civil service disciplinary appeals policies and suspension times. Additionally, the lack of an EWS—which, we note, is within the scope of a department-wide technology upgrade to a more automated and fully-integrated records management system (RMS)—could contribute to the perception of lack of transparency and accountability.

7. While the department's current wellness programs are aligned to industry best practices, the chronic stresses of the political and social climate, as well as the recent spate of officer fatalities and injuries, may merit greater structure for formalizing officer wellness programs. The lack of a more institutionalized, departmental wellness unit could limit the current programming's accessibility and administration, particularly given the impact of 2020's unrest on all members of the department. Furthermore, a meaningful EWS can better inform the need for officer wellness interventions serving to address root cause issues before they manifest themselves into acts that warrant disciplinary action.

8. The department's current initiative to implement a department-wide RMS represents an initial step towards greater automation, lowering the administrative burden on officers. SwiftProtect, the platform being used for the new RMS, appears to have the functionality to facilitate daily operations, as well as more thorough integration across case management, EWS, booking and warrant applications. However, the department's current staffing shortage and prioritization of more reactive responses may compromise its ability to deploy and utilize this new technology to its fullest potential and in a manner that is aligned to overall department and crime-fighting strategy. Further, the new RMS system will not integrate with BlueTeam, the program the department currently uses to document use-of-force incidents and investigations.

9. Interviews with members of SLMPD leadership and command staff alluded to a lack of cohesion at the top levels of the SLMPD. Various members of the department cited reliance upon personal relationships to do their jobs, which at times precludes a more universal perception of Chief Hayden as the leader both within the agency and the wider community.

10. There is no formal internal communications program, nor a strategic communications or crisis communications plan in place. The department relies on its public-facing Facebook site and departmental e-mails to disseminate information. However, officers at all levels of the organization voiced a lack of regular, clear internal communications as well as lack of a broader strategy for external communications. Further, the department lacks an internal employee satisfaction survey or means of gathering and auditing feedback from employees. The Police Foundation funded an internal survey, which was conducted in 2020—the results of which are not public. However, recent trends may require the implementation of an annual or more periodic survey, administered on a cost-effective platform.

11. The department lacks a strategic external communication plan, as well as a standardized means of gathering feedback from community members via surveys. The department utilizes external communication tools, including social media and the website. However, the department does not have an ability to track or monitor social media or the ability to archive their posts, and the PIO has difficulty obtaining information from district commanders or incident commanders. Further, community outreach is often left to district commanders, resulting in programs with varying levels of engagement. While officers from each district participate in recurring community outreach meetings, their level of involvement and follow-up on citizen inquiries vary by district; there is no department-wide standard for how feedback from community members is documented and actioned and communicated back to residents. Further,

interviewees noted that the absence of an external communications strategy has resulted in a reactionary approach. One supervisor stated that response often seemed to be reactionary to either politics or the media, which has affected morale. Another interviewee noted the union often speaks out on issues and may be construed by community members as speaking for the department.

RECOMMENDATIONS

Immediate (Next 3 months)

- Reassess organizational structure, staffing, and resources throughout the entire department to maximize resources. Analyze the effectiveness of each unit to ensure they are appropriately staffed and managed consistent with their clearly established objectives. Examine opportunities for merging units or disbanding units to reassign additional personnel to patrol functions where data and intelligence indicates they are most needed. To this end, Teneo Risk has provided an illustrative organization structure, based upon our analysis of patrol staffing, calls for service, response times, crime patterns and industry best practices. This illustrative structure, outlined in Appendix B of this report, reflects the prioritization and resourcing of community patrol; the consolidation of a number of groups and re-alignment based on similar functionality; greater focus in the chief's purview; the elevation of the RTCC and CAU to support more data-driven policing; and the addition of a chief strategy and implementation officer to support the chief. While the proposed structure will require further refinement and input from the chief and department leadership, it is intended to serve as a basis for further review. As a part of that review, and to inform further refinement of the organization structure and patrol staffing, we recommend that the department undertake an in-depth workload analysis in a next steps re-engineering phase.

- Increase collaboration with the City government to develop greater understanding on how to operationalize municipal policies and procedures within a law enforcement agency context. Interviews with both department leadership and City personnel representatives reveal a misalignment of priorities around hiring, recruitment and discipline. While Executive Order 48 assigned responsibility to the City for human resource functions, purchasing and other administrative functions in August 2013, these areas form the backbone of crime fighting. Therefore, oversight by the City Director of Personnel department may require greater input from the department to effectively operationalize civil service practices. To facilitate more open dialogue, we recommend the appointment of a department liaison to the City personnel director. This individual should be charged with engaging in regular meetings with the personnel director and staff. This executive-level police commander will also communicate and coordinate assistance by other City agencies for their services as needed.

- To inform crime strategy development, conduct an overall patrol staffing analysis, geographic crime hotspot analysis, and in-depth intelligence to determine who is responsible for a disproportionate level of crime in the City. Ensure the plan utilizes "SMART" objectives (specific, measurable, achievable, realistic, and time-bound) strategies and tactics. Our recommendation to elevate the RTCC and CAU from groups within the Technological Solutions and Investigations bureau to their own free-standing units under the assistant chief's purview is designed to support greater emphasis on data-driven crime strategy. Further, the appointment of an assistant chief and chief officer of strategy and implementation will catalyze the development of a more unified crime strategy.

- Augment existing CompStat program with a more solutions-based crime-fighting process via regular meetings chaired by the chief and supported by robust, modern crime-analysis techniques which amplify and elevate the Department's Crime Analysis Unit, resources, capabilities and approach. Focus on 7-day and 28-day trends of Part 1 crimes and share detailed analysis with all officers, and reward leaders who make smart deployment decisions.

Near-Term (3 to 6 months)

- Appoint a strong, trusted executive officer who will serve as the most senior aide to the chief who has the rank and authority to coordinate the chief's mission and strategic plan going forward. Additionally, the chief must convey to all ranks of the department his dedication to ensuring that equity and inclusion efforts of the department will focus on issues or perceptions of disparate impact in the areas of recruiting, hiring, promotions, transfers, assignments to specialty units. The illustrative organization chart provided herein envisions this individual in the role of chief strategy and implementation officer.

- Improve intelligence-sharing within the department to ensure information about crime patterns is distributed internally to the patrol level, and across other law enforcement agencies. Such a process may expand upon or formalize the model of the weekly shooting and auto-theft intelligence-sharing and problem-solving meetings.

- In concert with developing processes to augment the existing CompStat program, develop strategy for new technology implementation and full set of policies and procedures for the new SwiftProtect system. This initiative should fall under the purview of the newly appointed chief strategy and implementation officer, in close coordination with a stakeholder committee. These policies and procedures should account for leveraging the new technology to facilitate greater accountability and transparency. They should also address governance for new technology systems, appointing individuals responsible for periodic maintenance, policy and procedure review, training and collection of feedback from staff around adoption and utilization. By ensuring that the selection, installation and deployment of any technology is accompanied by policy development, the department can more effectively utilize the new capabilities to advance its strategic goals.

- In addition to more formalized, periodic surveys, we recommend that the department adopt more formalized standards for documenting feedback directed to district command staff during community outreach meetings to ensure that officers fully understand the concerns of the citizens they serve.

Long-Term (6 to 12 months)

- In conjunction with the creation of a strategic plan for the department, create a long-term executive strategic communication plan that conveys the chief's direction for the agency to four foundational stakeholders: employees, elected officials, the community and the media. As a part of this plan, develop a process for collecting feedback from both internal employees and community members on an annual or biannual basis. Feedback from employees should serve as the basis for formulating the departmental strategic plan over time and assessing the success of programs. Similarly, feedback from community members should be taken into consideration when refining crime-fighting strategies and daily operations. Outside of a more formalized survey, we recommend the department adopts more formalized standards for documenting feedback directed to district command staff during community outreach meetings to ensure officers fully understand the concerns of the citizens they serve.

- Work with the City on the creation of the Office of Equity and Inclusion to address the areas from the Equity Indicators baseline report published in 2018.[8] As a part of this initiative, appoint a chief equity officer, who will serve as a direct report to the chief, to oversee that all department policies and processes around recruitment, hiring, discipline, promotions, as well as ongoing training and evaluation, are carried out fairly, with equal outcomes across all genders, races and ethnicities. This position should be a civilian role, and the individual should be selected through a transparent process and must have credibility with the rank-and-file staff.

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[8] Equity-Indicators-Baseline-2018-Report-Document.pdf (stlouis-mo.gov)

5 CULTURAL DIAGNOSTIC

The sentiment across multiple interviewees at various levels of the St. Louis Metropolitan Police Department is that the department is comprised of good people but struggles to answer to stakeholders and faces chronic understaffing. As a result of these internal challenges, combined with the demands of policing a City with a history of worsening violent crime rates, the department and its officers have adopted what they referred to as a "fire-fighting" mentality, in which they respond reactively to all calls for service in the absence of a clearly-articulated organizational plan. This section of the report aims to identify the sentiments of both personnel and community members, which have come to define the SLMPD's organizational culture.

With regard to internal culture and operations, interviewees shared the perception that the leadership team lacks cohesion and unity. Some alluded to interpersonal differences between executive staff affecting day-to-day operations. For instance, many interviewees noted the lack of direct communication between executive command staff and district commanders, as well as lack of clarity in decision-making and chain-of-command. According to interviewees, this manifested in tactical operations, in which ambiguity arose around incident command structure. In addition, many interviewees felt the command structure has not changed in recent years despite increasing need for patrol officers, sergeant-level staff and detective resources.

Perhaps the farthest-reaching consequence of a perceived lack of communication and ambiguity around the leadership team is widespread confusion around who is leading the agency's crime reduction strategy. Interviewees nearly universally cited the department's lack of a clearly communicated, widely disseminated, written crime strategy. While they expressed widespread consensus that focus on Hayden's Rectangle had been the department's overarching tactic in the past, interviewees noted that current operational discussions and planning do not center on this tactic as consistently as in previous years.

Additionally, findings revealed challenges around accountability, transparency and equity, specific to use-of-force, discipline, promotion and performance evaluation. Multiple interviewees cited the department's historical difficulties around cultivating a culture of accountability and stated that the criteria for promotions remains unclear and subjective. According to one interviewee, the department chooses the rules that it would like to enforce and administers penalties based on interpersonal relationships. Interviewees noted that the processes for discipline and promotions were similarly opaque—an observation substantiated by the team's review of promotional and disciplinary procedures.

Scrutiny of the discipline system has arisen as a result of a conflict between collective bargaining agreement (CBA) rules and civil service rules. This conflict has led to the CBA effectively superseding civil service rules for disciplinary review. Specifically, the CBA states that disciplinary citations for suspensions of 15 days or fewer undergo review by a summary hearing board (SHB), comprised of a captain, an officer of the same rank of the accused officer, and an officer of one rank above the accused officer. Under civil service rules, suspensions for more than 15 days pass through the civil service review process, which includes review by the civil service commission hearing board. As a result of differences in process and outcomes, the department tends to issue more suspensions of fewer than 15 days, sending more cases through the CBA review process, rather than civil service rules. This culminates in shorter suspensions, less accountability for officers and greater potential inequality in how disciplinary issues are handled.

The CBA's current terms have also given rise to potential for inequity in the promotions process. As a result, individuals who may be more qualified for a position based on cultural or personal fit may be eliminated from consideration, and minority officers, whose tenures are typically shorter than their white counterparts', may have fewer chances for promotion. Further, consolidation of oversight responsibilities with the chief may also introduce inefficiencies in promotions; for instance, the chief must sign off on all officer performance evaluations, while sign-off by individuals two to three ranks above the reviewee could be more expeditious.

Challenges around accountability may result in the most significant repercussions to the department related to use-of-force and the current utilization of the BlueTeam platform for an early warning system (EWS). The implementation of a department-wide RMS—which has greater capabilities for integration with the call dispatch and case management systems, report-writing, arrest, booking and warrant applications—intends to address the current lack of a fuller EWS to record and track disciplinary and performance-related information. However, BlueTeam will not integrate with the new RMS, which may perpetuate issues around accountability and visibility into uses of force by district and individual. The department's current statistics around use-of-force indicate potential issues around supervisory intervention and investigation, which siloed technologies may cause or exacerbate.

From a policy standpoint, we noted the need for more explicit prohibitions around use-of-force, clearly characterizing it as a last resort and banning its use in a discriminatory manner, as well as adding provisions on de-escalation tactics. Further, the addition of policy directives banning chokeholds, as well as including greater emphasis on officers' duties to report any instances of force to supervisors; to intervene in any observed instances of excessive force and report them to his/her supervisor; and to be held accountable for justification of any uses of force would align the SLMPD's policies to industry standards. These provisions would also reinforce the department's commitment to a reverence for life, as well as a culture of accountability, truthfulness and ban on a "code of silence."

The department must utilize its technology platforms to advance and reinforce these policy changes. Teneo Risk's understanding is that the current system functions more as a data entry system than an investigations tool.

Further, procedures, which dictate that the officer utilizing force and his/her supervisor report to the scene to collect any evidence around justification of use-of-force or additional commentary from the suspect or witnesses, appear to be carried out with limited sense of standardization. This may contribute to an undercount of use-of-force instances.

Additionally, the department's statistics around use-of-force are not publicly available, and a June 2020 St. Louis Public Radio story called the process of requesting a release of the data "like pulling teeth."[9] The story also cited a 2019 report by a St. Louis researcher showing that police used force nearly three times as often in majority-African American neighborhoods compared to majority-white neighborhoods and claiming that uses of force likely are undercounted as a result of pre-2018 incidents only being recorded in the event of an officer injury.

While the current system and escalation rules provide the functionality and basic processes for collecting information, they do not provide the level of oversight for the level of transparency necessary to bolster community trust. Teneo Risk believes that more stringent policy and audit controls are needed to ensure independent investigation of each usage of force, as well as more explicit policy provisions and oversight around reverence for life. The department should also utilize the new technology platform to enhance its transparency by making use-of-force statistics publicly available. To that end, we set forth the following findings and recommendations, which aim to build an internal culture of greater accountability, transparency and equitability.

5.1   Findings

1. Discord at the top levels of the organization has led to lack of communication between senior and operational staff and the perception that political influence and personal loyalties supersede collaboration in daily operations.
2. The department lacks a well-defined chain of command that clearly establishes who is in charge and responsible for crime strategy implementation and oversight.
3. Strained relationships between unions and department leadership exacerbate the perception of lack of unity. Specifically, SLMPD officers hold memberships among two unions, the St. Louis Police Officer's Association (SLPOA) and Ethical Society of Police (ESOP). Though SLPOA and ESOP encourage membership from all officers, many officers view the St. Louis Police Officer's Association (SLPOA) and Ethical Society of Police (ESOP) as the unions for white officers and African-American officers, respectively. Further, tension in the relationship between SLMPD leadership and the SLPOA has contributed to delays in finalizing a collective bargaining agreement (CBA). This has resulted in a lack of clarity around the disciplinary process, as well as low morale among officers, who may perceive that the department doesn't prioritize their best interests. The City's Director of Personnel, who is also the head of the Civil Service Commission and currently oversees CBA negotiations has stated that the biggest challenge in the department's transition to City oversight has been ridding the system of binding arbitration on non-economic issues.
4. The department has been the subject of outside advocacy groups' demands for more diversity, as well as those of entities within its ranks, namely the two unions, SLPOA and ESOP. Independent reports by ESOP have cited disparities in recruitment outcomes for African-American candidates, and lack of transparency and equality in the discipline process. For instance, the ESOP has accused the SLPOA of "protecting corrupt, violent, bigoted, and sometimes racist police officers."[10]
5. Terms of the CBA have limited the objectivity and fairness in promotions, hiring and disciplinary processes. Under the CBA, a suspension of 15 days or less undergoes review by a summary hearing board (SHB), comprised of a captain, an officer of the same rank of the accused officer, and an officer of one rank above the accused officer. Cases heard

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[9] https://news.stlpublicradio.org/law-order/2020-07-30/st-louis-police-use-of-force-data

[10] *Report on the St. Louis Metropolitan Police Department by the Ethical Society of Police (2020), p 7*

through the SHB are often reduced from original level of suspension, resulting in officers routing a higher number of incidents through this process. The CBA's current terms have also given rise to potential for inequality in the promotions process. As a result, individuals who may be more qualified for a position based on cultural or personal fit may be eliminated from consideration, and minority officers, whose tenures are typically shorter than their white counterparts', may have fewer chances for promotion. Lastly, the CBA mandates that all openings for specialized units must be approved by the chain of command to Chief, and the police officers' association has to be notified of any vacancies being filed to discuss job qualifications—a process that could introduce subjectivity as a result of the number of stakeholders involved.

6. The Research and Planning Unit, which oversees the department policy and procedure documents, has witnessed a staffing reduction to half its original size since 2014, leaving the Unit's three staff members with limited capacity to oversee documentation audits and updates.

7. Department policy is contained in a main document, which Special Orders can supersede; individual divisions may also house their own operational manuals, separate of those Planning and Research oversees. As a result of this potential for decentralization, the department may have instances of contradictory or outdated documentation. One individual outside the unit noted, for instance, that operating manuals had not been updated in ten years, and the Teneo Risk team identified several SLMPD policies and procedures that should be reviewed and updated to be aligned with standard national practices.

8. Another systematic obstacle facing the department is the disconnect between the written, CALEA-certified policies and procedures and the daily operations and practices. Our preliminary document review indicates that the agency does have policy in place regarding chokeholds, reverence for life, etc., aligned with those of departments currently under consent decree. However, multiple interviewees cited a lack of adoption of policies and procedures in daily operations; for instance, although the department has a Rule 1200 that covers critical incidents, it was not utilized during the heightened protest activity in early June 2020.

9. The Research and Planning Unit's short-staffing has also posed a challenge around maintaining CALEA certification. While the certification remains a point of pride for the department and represents adherence to best-in-class written policies and procedures, the department was downgraded from "Advanced" to "Level 1" accreditation in 2013 as a result of a delay in their re-accreditation assessment. While the department has the opportunity to re-certify, the Research and Planning Unit's current staffing limitations preclude doing so.

10. The department's use-of-force policies, frequency of Taser usage, as well as the quality of use-of-force investigations require greater alignment with the current climate and industry standards. As written, the department's use-of-force policies do not sufficiently convey department expectations that force serve as an absolute last resort in interactions with the community, as well as prioritization of de-escalation techniques. For instance, Special Order 1-01 Philosophy for Use-of-Force and Periodic Review of Policy does not reflect an explicit commitment to the reverence for life; a prohibition on use-of-force; a ban on chokeholds; or a requirement for officers to disclose and justify use of both deadly and non-deadly force to their supervisors.

11. The department's track-record related to use-of-force—particularly specific to the frequency of Taser usage—reflects its policies' and training's disconnect with industry best practices, community sentiments and the current social climate. Use-of-force statistics from 2018 through 2020 indicate a relatively concerning frequency of uses of night sticks, riot batons and expandable batons, and an even higher frequency of Taser and stun gun usages and officer-involved-shootings given the overall population of St. Louis. For instance, one interviewee noted an officer used force on over 30 occasions and subsequently decreased the number of uses of force to under 20. This further attests to the disproportionate use-of-force, as well as the potential that a small subset of officers is responsible for a significant number of incidents.

12. The department's process for investigating and reviewing instances of use-of-force creates a lack of oversight and accountability, which may contribute to the disproportionate frequency of deployments, a general culture that accepts the invocation of force as course-of-business rather than an extreme last resort, as well as community dissatisfaction. Currently, department policy stipulates that officers create a report in the ILEADS system upon any deployment of force and notify their supervisors; the supervisors create a report in the BlueTeam system, the department's current system for documenting use-of-force instances. The BlueTeam report triggers a notification to the supervisor. Following approval by a lieutenant, the BlueTeam report then progresses to the level of the district captain, who enters the data into the IAPro system, where it is locked for review by the Bureau of Professional Standards. Based on this information, the department compiles a quarterly report addressing whether BlueTeam entries reflect sufficient

specificity to document probable cause and level of force used, the number of times and type of force used during the period, and identification of patterns and trends around use-of-force that require referral to the training academy. ILEADS and BlueTeam reports also undergo compliance checks by the IT team, which cross-checks each system to ensure no reports are missing from either system. However, it is our understanding that the entries are more of a formality and may only be investigated or reviewed if an allegation or complaint is made. Quarterly reports and related meetings do not necessarily address issues around use-of-force by individual or district. Instances of officers with disproportionately high use-of-force indicate that thresholds for notification to supervisors, as well as the current quarterly review, may not be sufficient or frequent enough to identify and intervene in instances where officers' deployment of force may jeopardize the rights or safety of the people they serve. Further, use-of-force statistics are not publicly available, which may be contributing to community distrust and lack of accountability for officers.

13. BlueTeam does not integrate with the broader RMS platform the department is implementing to bring together now-disparate CAD, case management and warrant, arrest and booking platforms. Without heightened vigilance and oversight, this could pose ongoing challenges around utilization and audit, as officers and supervisors spend more time in the SwiftProtect RMS program.

14. Training and continuing education curricula are generally aligned to industry standards, and the department meets or exceeds state minimum requirements for basic peace officer training and in-service training. The department also meets current national expectations in the areas of implicit bias, fair and impartial policing and de-escalation. However, the department's in-service training curriculum currently lacks instruction on ethics and professionalism and could benefit from greater emphasis on in-service leadership training, particularly for individuals being promoted from officer to sergeant or lieutenant roles. In-service training focused on ethics and professionalism, as well as role-specific training or opportunities for job-shadowing could further operationalize and reinforce the broader goal of building a culture of accountability and also provide officers mentorship opportunities and preparation for the transition from the daily activities and perspective of a rank-and-file staff member to a greater leadership role.

15. While development of a full early warning system (EWS) falls within the scope of a department-wide technology upgrade, the department's current lack of EWS and reliance on BlueTeam for early warnings specific to use-of-force only, currently lag behind industry standards. This has the result of a lack of oversight around officers who are subjects of repeated complaints from community members, as well as those who may be in or approaching violation of time-off policies or other department rules. It may also contribute to a lack of accountability at the individual and organization level.

5.2   Recommendations

Immediate (Next 3 months)

- Make all use-of-force statistics, including those that arise as a result of internal affairs investigations and citizen complaints, publicly available. They should be released in the department's annual report and broken down by nature of complaint.
- Focus quarterly, internal reviews of use-of-force metrics and investigation on which officers are using force and the types of force they are using. A more focused review will ensure that a small subset of officers are not using force disproportionately.
- Update use-of-force policies to ensure that they: clearly articulate departmental expectations and commitment to reverence for life; and align with industry best practices. (See specific recommendations in Appendix A: Use-of-Force Policy Recommendations)
- Mandate that all uses-of-force undergo investigations and consider augmenting the current use-of-force investigation process to be more transparent. For instance, require officers to notify operations of the use of non-deadly force and operations to notify the street supervisor to respond and conduct a thorough investigation. The investigation should include gathering evidence, identifying and seeking witnesses, ensuring proper medical care, and reviewing body worn camera and any other video evidence within 24 hours of the incident. The supervisory investigation of force will identify training deficiencies or policy violations.

Near-Term (3 to 6 months)

- Maintain a list of terms and conditions of the CBA requiring re-negotiation in the upcoming year; this list should include the current stipulations that may give rise to lack of objectivity and fairness in promotions and discipline.
- As part of the department's reorganization and strategic planning, facilitate executive command team-building and communications structure.
- Institute pre-service training for newly promoted employees to promote effective succession planning.
- Conduct exit interviews at the departmental level to determine why officers choose to leave and host focus groups to identify retention opportunities that could be implemented at both the City and police department level.

Long-Term (6 to 12 months)

- Develop a formal mentoring/professional development process for officers along with a transparent process for attending outside training.
- Develop a plan to bring together all departmental policies, order, manuals, and directives in one single repository and provide resources to review, revise, and harmonize all directives.
- Conduct quarterly executive leadership training and planning, perhaps in conjunction with the St. Louis County Police Department, for team building, education and long-term strategic discussions around improved collaboration.
- Create a departmental wellness unit to support and augment existing post critical incident support programs, peer support, post trauma support team, employee assistance program, and critical incident stress debriefings to ensure that the current programming is made widely accessible and continually updated to address evolving department needs.
- Ensure that a broader EWS platform is installed and readily utilized as a part of the departmental technology upgrade, and that officers and supervisors continue to utilize BlueTeam in the absence of integration into the broader RMS. BlueTeam, as well as the EWS, should be automated to send alerts whenever criteria are met and to generate reports that can be distributed to the City Director of Personnel, supervisors and departmental leadership. It should also have the ability to maintain records for a minimum of one year to align with the annual performance evaluation process. Additionally, its usage should be governed by policies enumerating criteria for alerting, parties responsible for notification, escalation of and investigation into potential behavioral or disciplinary red flags.

6   RESOURCE ALLOCATION

In light of the department's chronic short-staffing, as well as the failure in the November 2020 referendum to permanently repeal residency requirements for police personnel, resource allocation is likely to remain the main challenge to developing and implementing a more proactive, strategic and community-based approach to policing and affecting meaningful changes in organizational culture and operations. Efficient and effective allocation of the resources and personnel that the department currently possesses will serve as the foundation for developing and executing on a community-centric crime-fighting strategy, as well as the basis for any subsequent requests from the City government. The findings and recommendations in this section form the foundation for the implementation of the recommendations in the sections that follow.

The scope of our analysis of the department's resource allocation focused on a high-level review of the 2020 budget; an in-depth analysis of the current organizational structure and staffing, analysis of calls for service by district and type, response times and review of the department's current patrol staffing plans, review of the current functionality, differentiation and integration of the Intelligence Unit, CAU, RTCC, other investigative services and community patrol. Based on the information gathered, Teneo Risk has developed a revised organizational structure found in Appendix B for review and input from department leadership, which our team can help refine in collaboration with SLMPD to best meet the department's needs.

The Table of Organization for the SLMPD has an authorized staff of 1,340 sworn members. Multiple members of the department leadership and staff have noted that it is short by anywhere from 120 to 140 sworn members. However, the department considers the roles of employees that are out sick, on family leave, military leave, or suspended as "open positions" and also does not count Police Officer Trainees until their probation period ends, which may inflate the number of vacancies.

Compounding the challenges around recruitment and retention is the inherent discrepancy between the City's existing processes and procedures for civil service recruitment, hiring and onboarding and the needs of a 24/7 law enforcement agency. The City of St. Louis maintains oversight of the Police Department through the Mayor and Director of Public Safety, with hiring and recruitment processes overseen in part by the City's Director of Personnel. While Executive Order 48 outlines the City's responsibilities to manage human resources, purchasing and other administrative functions, interviewees revealed the widespread perception that Civil Service Commission regulations and practices do not meet the department's needs for recruitment and on-boarding, or the incentives for retention. According to department members, the resulting personnel and skills shortage has left the command staff stretched for patrol duties and in a constant reactive mode. Specifically, interviewees indicated that the overall perception within the SLMPD is that the City government's bureaucracy and lack of urgency in recruiting new hires contributes to the department's staffing shortages, and that gaps in the department's promotion process drive attrition.

For instance, commanders cited a lack of experienced officers and technically skilled civilians to fill key positions. Additionally, interviewees cited the City's budget constraints as the reason the department has not administered a sergeant's promotional exam in approximately five years, which some cited as a source of demotivation among younger officers and a staffing shortage at the sergeant level. The resulting lack of front-line supervisors may, in turn, contribute to issues around officer performance and policy compliance.

However, interviews with members of the City Department of Personnel highlighted efforts to increase the volume and diversity of recruits, lower the barriers of entry for promotion and increase overall transparency in hiring and promotion processes. Specifically, the City Director of Personnel noted efforts to staff for budgeted positions only, rather than positions the department claims to need immediately. The City has also sought to streamline the hiring process by shortening application forms and recommending the completion of background checks on candidates as a first screening step. Further, the Director of Personnel recently ended the requirement of an associate degree for promotion to sergeant, as well as an internal review board for promotion approvals. Finally, the Director of Personnel also expressed concerns around lack of objectivity in department hiring decisions, addressed in the "Cultural Diagnostic" section, as well as the current organizational chart, which he believes could more effectively re-allocate and deploy supervisors based on departmental needs. These are two areas of focus that we believe the department may address through reorganization and development of a strategic plan.

The revised organization structure aims to: 1) consolidate the overall number of units and bureaus; 2) align them based on shared or complementary functionality to eliminate redundancies between specialized bureaus' activities and district command operations; 3) advance crime-fighting strategy and improve crime-fighting techniques; 4) prioritize community patrol and maximize the number of officers on the street; 5) elevate the role of the CAU and RTCC and narrow the chief's purview to focus on strategy development and implementation; and 6) formalize new roles for an equity officer and chief strategy and

implementation officer to support the chief in developing and executing on a crime strategy, department strategic plan and associated communications programs.

We also recommend that the department undertake an in-depth workforce analysis as a next step, to take an exact inventory of the current number of full-time employees, how those employees are spending their time, and roles that could potentially be filled by civilians rather than sworn officers. Additionally, officers claimed little to no self-initiated time to engage with residents and businesses or help problem-solve ongoing issues. However, data from the CAU indicates that on average, officers allocate up to 25% of their time to self-directed patrol, showing that officers may have time available outside responding to calls.

The current organizational structure, staffing plans and departmental operations may exacerbate understaffing in districts that are hardest hit by crime and create redundancies or silos between specialized units and patrol operations. Specifically, district commanders and officers who utilize outputs from the Intelligence Unit, Crime Analysis Unit (CAU) and Real Time Crime Center (RTCC) praised those units' capabilities. However, these groups face staffing shortages that impair their functionality, and in the absence of a platform to distribute information across the department, district command staff utilize the information and intelligence on a relatively ad-hoc basis, relying more heavily on personal relationships rather than more formalized processes.

The Intelligence Unit, for instance, currently reports directly to the chief and works with federal officers. However, the unit's work currently consists of a significant amount of warrant enforcement and engagement with often-violent individuals, rather than information gathering and dissemination. As a result, the department lacks regular reporting and robust databases aggregating the City's most violent offenders, gang members and trends and patterns by district. While the CAU currently has some of this information and in late 2020 unrolled a department-wide dashboard, housing both intelligence and district-specific crime data, adoption and training on the dashboard has depended on individual district commanders as a result of short-staffing and COVID-19-related disruptions in operations and regular meetings.

While department leadership acknowledges the lack of resources, the current need for personnel on the street makes an influx of assistance unlikely. Similarly, the RTCC serves as a real-time intelligence disseminator, monitoring the CAD system, LPRs and more than 1,500 cameras installed at locations throughout the City, and then distributing this information to responding units. However, short-staffing within the RTCC has limited its social media monitoring, which could help inform efforts by the CAU and intelligence team in identifying suspects, given the dynamic nature of gang activity within the City. As a result, monitoring currently takes place only when officers are available.

Short-staffing and lack of clarity in the roles of the CAU, RTCC and other specialized units has also contributed to challenges around the collection, review and evaluation of departmental outcome metrics. In addition to crime data, regular analysis of patrol staffing, calls for service, response times and clearance rates is critical to continuously updating staffing plans and departmental procedures to meet current external needs and internal resources. Teneo Risk's attempts to obtain this information were met with lack of clarity around the individuals or units responsible for compiling the information, which indicates that the department does not have a process in place for regular review, distribution and incorporation of output metrics into crime fighting and community patrol strategies and tactics.

Our proposed revisions to the organization chart aim to facilitate greater collaboration between the RTCC, CAU and Investigative Services and district command staff. Currently, the RTCC and CAU fall under the Intelligence Bureau, housed within Technological Solutions and Investigations. In the new, proposed structure, however, we sought to elevate the RTCC and CAU to the same level as community patrol and Investigative Services. By aligning the RTCC and CAU with community patrol, we aimed to generate greater information flow to both command staff and the Intelligence Unit. We also moved each of these bureaus under the purview of the assistant chief, rather than the chief himself, with a goal of identifying potential synergies and opportunities for information sharing, as well as overseeing department-wide use of their outputs.

6.1 Findings

1. While a state law has eliminated residency requirements for officers hired before September 1, 2023, a recent referendum rejected the permanent repeal of residency requirements, and so the limit on hiring of non-St. Louis residents will continue to impede recruitment, underscoring the importance of prioritizing how officers are utilized and how street assignments are made.

2. The department may have fewer true FTE positions open than perceived because of classification issues; interviews with department staff and leadership have cited a range from 120 to 140, illustrating discrepancies and lack of accurate, in-depth inventory of the number of open positions, breakdown of sworn versus civilian members and assignments.

3. The City manages the police hiring process much like it processes other City employees, which has highlighted the need for greater collaboration and sharing of feedback between the City government and the police department, as well as potential adaptation from both City and the police department to better align the existing processes for civil service roles to a law enforcement agency's needs for recruitment, hiring and retention.

4. Interviewees consistently cited pay and residency requirements as the two most pressing impediments to recruiting and retaining staff. Multiple interviewees noted the department regularly loses 10 to 12 officers per month. A November 2020 referendum vote rejected the permanent repeal of residency requirements for first responders. In addition to the residency requirement, competitive pay and benefits and lack of opportunities for promotion also remain challenges to recruitment and retention.

5. Salary limitations inhibit the department's ability to hire for jobs that could be held by qualified civilians, such as dispatcher, requiring police personnel to dedicate time away from patrol and key law enforcement functions.

6. Districts are staffed evenly across the City, rather than proportional with district size, population, number and severity of calls for service or crime levels. This staffing has resulted in shortages in areas experiencing heightened levels of crime. Further, a high number of officers serving on specialty teams may contribute to understaffing patrol districts.

7. Reporting lines between the respective bureaus and units and the chief's office reflect an ad-hoc, legacy organizational structure. For instance, the chief has purview of a wide number of units, to include Information Technology, Supply, Purchasing, and the currently defunct Cyber Crime Units. Additionally, other reporting structures—such as Community Engagement & Recruitment's placement within the Technological Solutions & Investigations Bureau and the Fugitive Unit's placement within the same bureau as Communication and Records— do not reflect functional alignment. As a result, bureaus and districts rely on the strengths and judgment of their respective commanders and personnel in developing crime-fighting strategies and carrying out daily operations, rather than a unified crime strategy and division of labor.

8. Staffing shortages currently hinder the Intelligence Unit, RTCC and CAU from engaging in core functionalities, including information gathering and dissemination, social media monitoring and compilation of City-wide lists of repeat, violent offenders, gang members and other individuals who may be responsible for a high volume of crime. As a result of this lack of centralized information-sharing and processes for distributing information across the department, utilization of RTCC, CAU and Intelligence outputs varies by district and commander.

9. Although the department currently has the ability to collect, review and analyze output metrics necessary for a comprehensive workload analysis and data-driven staffing decisions, it maintains the same number of units for each district. Our understanding is that staffing formally falls under the purview of Planning and Resources, but the CAU houses metrics from the CAD system around calls for service by district and type, response times, time spent responding to calls for service versus proactive patrol, as well as clearance rates. The department had provided staffing information to the Board of Aldermen in early 2020 but does not have policies and procedures in place to ensure regular review and analysis of output metrics at the district or department level to inform strategy development and ensure that resources are allocated to the right locations and activities.

10. Officers claim little to no opportunity for self-initiated time to engage with residents and businesses or help problem-solve ongoing issues. They cite that time spent on calls for service detracts from the time they have available to engage in community policing or more proactive service. Our analysis of calls for service indicates that a significant number are minor and can be handled by an alternative resource, freeing up officers to engage in more crime prevention and intervention.

11. The SLMPD does not administer surcharges from police officers working secondary employment. Currently, secondary employment is managed through outside firms, and officers are contracted separate of the department. While the department requires them to record hours of secondary employment within the department system, it does not have adequate controls and procedures in place to ensure employers submit required documentation. The SLMPD also does not appear to have procedures to periodically review secondary employment hours reported or ensure employees are approved for secondary employment on an annual basis. As a result, the department did not detect

some employees claiming to be working at the SLMPD at the same time as they were working at their secondary employer or incorrectly recorded secondary employment hours.[11]

6.2   Recommendations

Immediate (Next 3 months)

- Implement an organizational restructuring, which consolidates and aligns bureaus based on potential synergies or areas for greater collaboration; facilitates a more strategic and data-driven approach to community policing and crime-fighting; and maximizes the number of officers available for community patrol. (See proposed organization structure, included as Appendix B to this report)

- Identify alternatives to officer response for non-violent, low-level disturbances, such as greater use of telephone reporting for low-level larcenies, vandalism and non-injurious fender-benders; or fines for too many false alarms. As a starting point, the department may consider re-visiting alternatives proposed in the 2017 Strategic Plan, Objective 6-1. Re-routing low-priority calls for service will result in more free time for officers to engage in focused crime prevention.

Near-Term (3 to 6 months)

- Determine how many officers are on administrative leave, how long the investigations take, and if the officers could be utilized in other ways to support the crime fight while on administrative leave.

- Conduct a full assessment of the current whereabouts of every sworn officer in the department, as well as whether the positions that they occupy require fully-trained, professional officers, if not involving street duty.

- Designate a department liaison to the City Personnel Department and Director of Personnel. Similarly, incorporate opportunities for greater department input and feedback in human resources functions the City oversees, with aim to more effectively adapt civil service procedures for law enforcement needs.

- Develop a program to collect surcharges from officers' secondary employment as a potential source of funding for the department. By charging secondary employment agencies a 10% administrative surcharge on top of the hourly wage paid to officers, for instance, the department could open an additional revenue stream.

- Implement controls around secondary employment, noted in state auditor's report on the Department of Public Safety. These include annual approvals by the department for secondary employment and review of secondary employment hours.

- Schedule promotional examinations on a more regular basis to increase opportunities for promotions and, in turn, department morale and retention.

- Formalize and expand the department's current awards and recognition programs to reward exceptional community policing and tactical de-escalation. While the department policy notes monthly recognition for both sworn and non-sworn personnel for non-supervisory levels in the organization, as well as an officer of the year award and district-level recognitions that vary by commander, creating awards for community policing and service and exemplary instances of utilizing de-escalation tactics as alternatives to force, will further underscore the department's commitment to a more community-focused approach and increase officer morale.

Long-Term (6 to 12 months)

- Appoint an individual charged with undertaking an in-depth assessment and review of the department's existing structure and staffing allocations to develop an exact break-down of sworn versus civilian roles, as well as distribution of calls for service, to inform more specific recommendations for reorganization and more efficient resource allocation. As a part of this assessment, conduct a full accounting for every member of the SLMPD to establish a correct count of sworn and civilian staff members and where they are currently assigned.

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[11] https://app.auditor.mo.gov/Repository/Press/2020079603096.pdf

7   CRIME CONTROL STRATEGIES

Like departments across the country, the SLMPD faces a community that is angered by highly publicized instances of excessive use-of-force throughout the country and that is also fatigued from the region's history of fractured trust in law enforcement. Increasingly, people are shot over "beefs," and Missouri open carry laws create a proliferation of legal and illegal guns on the street. The recent uptick in violent crime, which mirrors that of other US cities struggling with the economic and social fallout of COVID-19 and quarantine restrictions, has only compounded these challenges and will likely continue to drain both community trust and department resources and morale into 2021. As noted above, the department's lack of personnel, as well as the lack of strategic focus and ability to collect departmental output and community feedback, only exacerbates these external circumstances. Thus, implementation of more effective crime control strategies will hinge upon organizational and procedural changes to most effectively use existing current tools, staff and budget.

While the commanders and unit heads interviewed universally alluded to Chief Hayden's crime plan as either "The Hayden Triangle" or the "Hayden Rectangle" and described the Department's overarching tactic of placing more officers in high-crime areas, most felt that it has not been implemented or administered on a more wide-scale or formal basis over time and also falls short in addressing the persistent rates of violent crime throughout the City. For instance, increases in crime in neighborhoods outside the Sixth and Fourth districts are an unintended consequence of the current crime reduction tactics. The plan also concentrates on geography, rather than targeting both crime hotspots and the people and groups committing violent crime in the City. One interviewee specifically characterized the need to focus more attention on the City 's top violent criminals as "a plea." According to this officer, focusing on the most violent offenders could not only lower the homicide rate but also the rate of property crimes and other more minor offenses committed throughout the City. Other interviewees also noted a general lack of awareness among both district and specialized unit officers around key offenders—particularly those in gangs—which are significant blind spots given St. Louis' highly dynamic crime landscape.

In addition to the disproportionate emphasis on hotspots, the absence of a more formalized crime strategy and platform and process for intelligence-sharing also hampers long-term planning, solutions-based and community-focused policing by commanders. For instance, captains reported using anti-crime teams to address problem areas but at the expense of anti-crime teams' ability to support 911 response units. Other interviewees made comments regarding lack of a plan and that the department was in "crisis management" going from one crisis to another, driven by calls for service. The lack of departmental crime strategy to inform operational planning and daily activity has also contributed to a decline in officer morale. Almost every individual the Teneo Risk team interviewed expressed frustration with the lack of planning and patrol resources. Specifically, department members stated the agency needed assistance with an actionable crime strategy.

This call-to-action was addressed through the submission of a Public Safety Plan for Violent Crime Reduction to the Mayor, Board of Aldermen and Public Safety Committee by the Director of Public Safety in January 2020. The document highlighted three areas of concern: difficulties in hiring qualified officers to create a department that reflects the diversity of the City; the abundance of gun crime and guns on the street; and the lack of holistic solutions to heal the City. However, the plan was not shared throughout the department, nor did it outline specific objectives, strategies and tactics with timelines or metrics associated with each area of concern. Such a lack of specificity and metrics is likely to hinder the plan's implementation and evaluation, regardless of how readily it is communicated. As noted previously, while the RTCC, CAU and Intelligence Unit compile and distribute periodic reporting and real-time information on the City's top violent offenders, district crime statistics, as well as alerts from ShotSpotter, cameras and LPRs, each district commander and officer consumes and utilizes this information differently. As a result, information-sharing and collaboration between specialized units and district command, as well as within each district, is based more upon personal relationships and ad-hoc needs, rather than a formalized, systematic process and methodology.

Based on these observations, detailed further below, we set forth the following recommendations, which aim to improve the SLMPD's ability to prevent and fight crime through greater, institutionalized reliance on data, as well as more formalized collaboration among district command, specialized units and local, state and federal partners. These recommendations provide the tenets of a strategic crime plan and set the stage for its implementation and continued evaluation.

7.1   Findings

1. The department does not have a coordinated agency-wide methodology to reduce crime. While district commanders are expected to lead the crime fight in their areas, there is no long-term planning, coordination, or strategic deployment

of resources to assist them. Similarly, roles and responsibilities around strategic crime reduction are spread across several units, and there is no commander or unit that is charged with capturing the most prolific and predatory criminals, including those wanted on warrants.

2. Use of crime data from the Crime Analysis Unit (CAU), Intelligence Unit and RTCC is uneven and creates knowledge gaps among specialized units and district command staff. For instance, CAU released a dynamically updated dashboard of crime statistics in January 2020; however, interviewees noted that usage varies by district and individual officer. Many interviewees described intelligence-sharing resulting from ongoing or self-initiated dialogue with the RTCC officers. While they praised the information compiled by the CAU and RTCC, including weekly reports on top suspects and aggravated assaults, others were unaware of its distribution, suggesting the lack of process for ensuring the information is distributed widely and following up on how the intelligence is actioned.

3. Specialized units and districts do not have a centralized, formalized platform or process for sharing intelligence and coordinating efforts. Additionally, district commanders may undertake activity that is redundant with specialized units. In recent protests, for instance, both district staff and the Mobile Reserve Unit undertook high-visibility patrol. Further, a recent initiative to identify the most violent offenders for Operation LeGend and the cross-border project, piloted through our assessment efforts, did not have a ready database but instead relied on lists from districts. The lack of a centralized list of the most dangerous and most prolific offenders from each district limits the effectiveness of patrol and investigations, as well as any broader initiatives or collaborations with other agencies.

4. The Department's current CompStat program focuses on recitation of statistics from the previous weeks, rather than more tactical, solutions-based crime fighting or focus on trend information in blocks of time (e.g. 7-day or 28-day trends). Broadly, the City does not adhere to the four principles of CompStat: accurate and timely intelligence, effective tactics, rapid deployment, and relentless follow-up. For instance, the meeting that the Teneo Risk team members observed during the initial review period featured discussion regarding gang activity but little intelligence on who the violent players are in the gangs. This lack of more tactical or solutions-based discussion may be occurring because the public and media can attend, and one interviewee also noted a potential hesitancy on the part of officers to discuss issues in the presence of such a broad audience. As a result, the department hosted closed crime strategy meetings, which multiple interviewees characterized as productive and an incremental step towards more operational discussion. However, public health concerns arising from COVID-19 temporarily curtailed these meetings.

5. There is no centralized focus on gang, guns, and drug activity, which likely drive a significant amount of crime in the City. Different district commanders and specialized units perceive the ties between drugs, gangs and guns differently. As a result, there is no coordinated gang strategy, combining enforcement, investigations, intelligence gathering, and intervention. One specific blind-spot currently facing the department is a potential under-emphasis on the breadth of gang involvement in violent crime. For instance, 13 homicides occurred the week of July 27—11 of which took place in District Six, and the majority of those are believed to be gang-related. Other violent crime throughout the City, particularly carjacking, is also likely attributable to gang activity. Multiple interviewees described gang activity as relatively decentralized and unpredictable, stemming from an estimated 30 to 40 groups and often flaring as a result of "beefs" on social media. This results in constantly changing alliances and rivalries among loosely organized and evolving contingents and requires ongoing monitoring. However, the Gang Intervention Unit has been significantly reduced. Currently, it consists of two individuals and no longer includes a formal intelligence function, leaving district commanders and patrol staff with varying degrees of knowledge or unaware of repeat offenders, suspects and dynamics driving violent crime on their beats. The department also currently lacks criteria for removing individuals from its gang database, though developing a more standardized process is currently underway.

6. ShotSpotter alerts are dispatched as Priority 2 calls, which generally results in a response time of approximately 12 to 14 minutes and may compromise the ability to obtain witnesses and evidence.

7. There are some modest collaborations between SLMPD and its counterpart in the County, such as some joint task forces and special events work, occasional ad hoc operations, and informal avenues of intelligence sharing that occur between detectives and supervisors from both agencies. While County and City officers work together on a more regular, coordinated basis to respond to incidents occurring on the MetroLink, and the two agencies have formalized contractual relationships with their respective Aviation and Bomb and Arson units, the City and County do not analyze and share criminal intelligence in any regular or strategic manner tied to specific crime-reduction efforts. Prior to

COVID-19, informal and tactical information-sharing occurred through weekly meetings on violent crime, which County officers sometimes attended; however, the pandemic stopped these early efforts.

8. Clearly, police departments need strong relationships with local prosecuting attorneys, and we advocate for a strong relationship between the Circuit Attorney and the SLMPD. Intelligence-sharing and collaboration among the SLMPD, state and federal agencies appear to be limited. For instance, while the Anti-Crime Unit currently houses four US marshals and an additional eight federal agents. However, other members of the department are unaware that these resources are available to and integrated with the department. Additionally, the SLMPD does not take full advantage of its membership in the Midwest High Intensity Drug Trafficking Area (HIDTA), which is the federal government's long-standing program to funnel grant money to cities to counter illegal narcotics and related crime. Unlike other major police departments in the six-state HIDTA region, SLMPD does not directly sponsor a HIDTA initiative, thereby missing a valuable funding source that could be used to counter drug-related violence.

9. Another acknowledged deficiency is the department's lack of effective information sharing, particularly with their neighbors across the river in East St Louis, Illinois. This has been a source of a recent spate of violence particularly in the downtown District 4 with seemingly no effort to exchange information.

7.2   Recommendations

Immediate (Next 3 months)

- Augment and supplement existing CompStat program. The new program should reflect a solutions-based crime-fighting process that demands accountability via regular meetings for sharing detailed analysis and empowering leaders who deploy resources to address emerging trends.

- As a part of this initiative, implement regular crime meetings, chaired by the chief, that using a CompStat or similar methodology, include crime-reduction goals, performance metrics for commanders and information-sharing between patrol staff, as well as County, state and federal partners. To that end, we recommend implementing more tactical, weekly meetings in addition to the existing, public CompStat meetings. These tactical meetings may be attended by a smaller audience than the current CompStat meeting and should facilitate greater collaboration between district commanders and heads of investigative units to identify and address crime conditions in their areas of responsibility, formulate plans to reduce crime spikes, and relentlessly follow up and assess which strategies are working and which are not. These meetings should also address crime statistics for the 7-day, 28-day, and Year-to Date (YTD) and compare them across the immediate prior blocks of time and the same periods for the prior year.

- Enhance proactive and widespread information-sharing across the agency, as well as greater connectivity to state and federal task forces. Subject to further review and input from department leadership, the proposed organizational structure in Appendix B elevates the CAU within the broader organization—a move designed to position it, along with the RTCC, to systematically distribute information to the patrol divisions.

    While the St. Louis region continues to struggle with high rates of violent crime, data analysis indicates that there are particularly high concentrations of crime in certain areas in both the City and the County, and most specifically along a corridor defined by a 3-mile border between the 8th Precinct in St. Louis County mostly within the City of Jennings and the 6th District in the City of St. Louis, which includes the Walnut Park West and North Pointe neighborhoods. This border area of the City and County suffers from some of the most significant violent crime in the St. Louis region. It therefore offers an ideal opportunity for a new collaborative crime-fighting effort for SLMPD and SLCPD, local prosecutors and their federal law enforcement partners. This border crime is shared by both SLMPD and SLCPD, and so, too, must be their response. A smart, targeted policing initiative, developed and implemented jointly by SLMPD and SLCPD, will drive down crime and demonstrate to the region's stakeholders that good policing matters. It is our recommendation to pilot a 120-day crime reduction and community engagement initiative along the 3-mile border area noted above. The purpose for a 120-day initiative would be to launch, assess outcomes and successes during the period, and build a model of partnership that can be used in other neighborhoods in the region for the benefit of the community.

Near-Term (3 to 6 months)

- Task district commanders with creating and managing community policing strategies that meet their constituents' needs and promote the department's overall mission and vision.

- Formalize operating procedures of specialized units to include collaboration and dialogue with district commanders regarding enforcement actions.

- Create an infrastructure and platform for timely distribution of intelligence across all levels of the department. Intelligence should include a City-wide "most wanted" list, intelligence on violent crime suspects, data from RTCC tools, as well as a listing of resources from FINCEN and other local, state and federal partners.

- Re-assess use of ShotSpotter technology as part of a new department-wide crime strategy; consider classifying all incoming ShotSpotter notifications as "Priority 1". Although this classification will increase the volume of calls for service, the number of new Priority 1 calls would be a projected increase of approximately 2,700 to 3,000—a fraction of the current number of Priority 1 calls. Given the SLMPD's track record of a five- to six-minute average response time, as well as the proposed organizational changes to increase patrol staffing and also reduce the number of calls for service around quality-of-life issues, as recommended in the "Resource Allocation" section above, we believe that responding to ShotSpotter notifications as Priority 1 calls would not significantly hamstring the department's staffing or response times. It would also better enable intelligence and evidence gathering to identify and apprehend some of the City's most violent criminals and reduce the number of guns on the streets. Additionally, the department's new in-vehicle technology, which enables immediate ShotSpotter notification, as opposed to notification via the RTCC, will further reduce response times to shots-fired incidents. For a city, in which 90% of homicides are gun-related, this prioritization of ShotSpotter notifications will also make that even prosecution for discharging a weapon within the City limits needs to be vigorously pursued.

- Assess the existence and extent of violent street gangs, crews and drug organizations. Based on those findings, designate groups for priority prosecution with state and federal partners.

- Ensure that each of the six district commanders identify an officer/detective responsible for gathering local intelligence, conducting regular coordination meetings and conveying information to the Intelligence Unit on a regular basis. Local officers are best positioned to know what's happening in their communities. Naming the Intelligence Unit as the central collection and distribution center will ensure a process is created to exchange information   systematically.

- Establish a training session for centralized and district personnel on the types of intelligence and the format for sending and receiving to assist the flow of intelligence in both directions.

- Create a committee or working group, comprised of department leadership, representatives from City and County social services, City prosecutor and other relevant community stakeholders and experts to explore and develop a plan for potential co-responder or police-mental health collaboration (PMHC) model. Effective co-responder and PMHC programs reflect collaborative partnerships with law enforcement agencies, mental health providers, and other community-based organizations that could enable officers to respond more safely and effectively to calls for service involving individuals with mental illness, reduce repeat calls for service, minimize the strain on agency resources, and connect community members to services they need. A co-responder or PMHC model would also contribute to an approach that reduces over-reliance on police for enforcement, rather than prevention and intervention.

8   TOOLS & TECHNOLOGIES

Effective deployment and use of tools and technologies will help to advance and automate community policing and crime fighting. Together, greater automation of data entry and collection, greater integration between RMS, CAD, case management and EWS platforms, and more systematic distribution of intelligence and departmental output metrics will reduce the administrative burden on officers and facilitate greater transparency and collaboration across the department. This will, in turn, enable officers to spend more time engaging with community members and fighting crime, and equipping supervisors and departmental leadership with the ability to evaluate both officer performance and impact of strategic initiatives. However, tools and technology alone only provide the functionality necessary for automation and integration. Their adoption, effectiveness and utilization depend upon the policies, procedures and oversight governing implementation and maintenance, as well as training for staff.

In 2020, the SLMPD undertook two key initiatives towards aligning the department's capabilities to the standards of other large, urban police departments—namely, the adoption of a body-worn camera (BWC) program, as well as a technology upgrade. The BWC program, which began at the end of November 2020, was a $5.8 million investment and equips 800 officers with BWCs in 2020. From September through October 2020, the department trained 654 officers and issued a directive addressing preliminary policies and procedures covering BWC usage. The department plans to train commanders and detectives in the future, and to replace the directive with a special order once leadership has gained greater feedback on the implementation and issues that have arisen.

Industry-leading features of the BWCs include the ability to send photographic evidence between devices, as well as the BWCs' automatic activation capabilities. Through integration with the CAD system, for instance, the BWCs automatically activate once an officer gets within 500 feet of the destination the radio call sends him/her. The BWCs of any other officers in the vicinity are also activated. The BWC system also includes sensors in officers' holsters, which activate the cameras any time an officer draws a weapon.

The technology upgrade encompasses transitioning the department from separate RMS, CAD, case management and use-of-force investigations platforms and previously manual processes for arrest, warrant and booking data entry, to the SwiftProtect RMS system. SwiftProtect integrates with CAD, case management, arrest, warrant and booking platforms. As a part of this upgrade, the department is also building out a full EWS, which expands upon the current procedures for recording use-of-force incidents into BlueTeam and ILEADS, to include recording and notification and escalation for officer complaints and discipline, as well as auto accidents, sick and injured time. However, it is worth noting that BlueTeam will not integrate into the broader SwiftProtect platform.

Integration through SwiftProtect will also create tactical efficiencies. SwiftProtect will be accessible to officers in their cars and to sergeants and above via desktop. The technology upgrade will also facilitate the integration of ShotSpotter and LPRs, allowing officers to receive license plate information of cars in the vicinity of ShotSpotter notifications and thereby potentially reducing the amount of time on each response to ShotSpotter calls.

While both technology upgrades provide the SLMPD with hardware that meets or exceeds industry standards, the department's lack of strategic crime plan, implementation plan, comprehensive governance structure, policies or procedures, may limit the technology's adoption and effectiveness. In the absence of a clear organizational plan and crime-fighting strategy, the department may lack the direction to best prioritize how and where the technology is utilized. To understand the role of technology in crime-fighting, and to draft implementation plans and policies with the specificity and scope necessary for strong governance, department leadership must also understand the potential impacts that new technologies have on all elements of daily operations. For instance, the BWC program will change the investigations process for complaints and use-of-force incidents and will necessitate policy and procedural changes beyond what is currently included in the draft special order.

The absence of implementation plans or more detailed policies and procedures around new technologies' deployment may result in levels of adoption that vary by officer and by district, as well the development of "shadow" IT, which means informal processes or work-arounds by individual officers in the absence of departmental guidance and training. While issuance of draft directives or policies is sufficient to cover the stages of implementation before the department can develop a full understanding of potential issues and applications of the technology, any interim documents should build procedures and standards based on department strategic objectives—thus reflecting a level of specificity necessary to facilitate and evaluate early deployment and ensuring that best practices drive adoption and usage, rather than technological or logistical limitations. Implementation

plans and policies should also set forth departmental output metrics against which the department is benchmarking the technologies' overall adoption and effectiveness.

Our findings and recommendations note specific gaps, noted in our review of the draft BWC directives, as well as potential areas of opportunity for developing more comprehensive policies and procedures necessary for widespread adoption of the SwiftProtect system and for articulating these initiatives to the St. Louis community. They aim to ensure that the implementation and evaluation of both the BWCs and RMS system are as actionable and as strategic as possible.

8.1   Findings

1. In anticipation of the deployment of the BWCs, the SLMPD is currently working on a draft special order, which identifies the ways in which devices are automatically activated, circumstances in which officers will activate the devices manually, and conditions during which officers cease or refrain from recording. While these provisions are aligned to industry standards for the deployment of BWCs, the draft directive and special orders lack provisions for late activation, premature deactivation and failure to activate.

2. BWCs have the potential to be a supervisory tool when used to investigate complaints or by watch commanders to review random incidents of their officers daily for training purposes and compliance with department policy. However, the draft directive and special orders do not address conditions under which both the public and officers can access tapes. The SLMPD is currently reviewing International Association of Chiefs of Police (IACP) policy and others to determine the best course of action. However, special orders should also be customized to local community needs, state regulations, and any concerns that may arise from the collective bargaining units.

3. Similarly, each component of the technology upgrade lacks associated written policies and procedures governing its usage, ownership and training curricula. Specifically, reservations have been raised about technology and its impact on privacy in the use and distribution of information. One interview noted that the Board of Aldermen was handling privacy related to BWC footage and other digital information, but the department should be involved in finalizing those policies as soon as possible.

4. The department has not yet designated output metrics by which to evaluate the adoption and effectiveness of the new RMS, case management, arrest, warrant and booking capabilities, as well as the expanded EWS.

5. One known gap in the SwiftProtect infrastructure is the lack of integration with BlueTeam, the system the department currently uses to record and track use-of-force incidents. This lack of integration will require officers to continue to make entries and cross-reference the BlueTeam application, which may contribute to decline in BlueTeam usage and, in turn, less compliance with departmental standards for use-of-force documentation, as SwiftProtect becomes more ubiquitous.

8.2   Recommendations

Immediate (Next 3 months)

- Form a committee, headed by the new chief of strategy and implementation, whose purpose will be integrating all the new technologies into the department's crime strategy. This initiative should include integration of SwiftProtect with the infrastructure or platform that the department adopts for distribution of intelligence and CompStat tracking, noted in the "Resource Allocation" and "Crime-Fighting Strategies" sections. Doing so will ensure that leadership has greater visibility on department output metrics, in addition to crime data and intelligence.

- Determine how the BWC program will be communicated to both officers and the public. Given ongoing lack of trust and frustration within the community, BWCs could be an opportunity to foster greater transparency and means for recourse in the event community members feel that they have been mistreated or unfairly targeted. Similarly, many officers may view BWCs as a source of protection if they are accused of wrongdoing. However, some may view BWCs as a source of heightened scrutiny.

Near-Term (3 to 6 months)

- Determine departmental outcome metrics that will be used to evaluate the BWC program's effectiveness and serve as the basis for developing new training curricula or updating policy and procedure documents. Illustrative metrics

include comparison of the number of complaints against officers and use-of-force investigations before and after the deployment of BWCs.

- For each system included within the SwiftProtect platform (e.g. CAD, RMS, case management, EWS, booking, warrant, arrest), determine metrics to evaluate and assess overall adoption and usage by relevant department members, as well as standards for frequency of data reporting and review.

Long-Term (6 to 12 months)

- Ensure that special orders or directives related to BWCs, the new RMS program, LPRs and all other devices housing department data specify clear privacy provisions, consistent with Sunshine Laws and other stakeholder interests. Specifically, policies should articulate who can have access to footage, the time period for which footage and information is stored, redaction of footage that doesn't include criminal activity, as well as the platform by which the footage is made available. These provisions should be developed in close collaboration with the City legal team, mayor and other local and state legislators.

9   COMMUNICATION & PUBLIC INFORMATION

Internally, commanders felt there was limited communication from the chief and executive leadership both up and down the chain of command. Many pointed out what they perceived to be discord at the executive leadership level, and that it was felt across the agency. There was also a concern that the chain of command wasn't followed in critical incidents, and some felt that the chief selected people to speak with instead of following the chain up and down.

Some interviewees felt executive management hasn't been looking out for them in a way they would expect of leadership, which is affecting officers' efforts in attempting to be more proactive given the current climate with policing across the country. One supervisor stated that everything seemed to be reactionary to either politics or the media, which has affected morale and proactive work. Some feel that if they try to make a difference, they may end up being, in their words, criticized or fired.

From an external vantage point, the City and department must concur on who speaks for the department and when. In reviewing media over the past six months, both the Public Safety Director and chief speak about similar incidents and topics leading to internal and perhaps external confusion as to who is responsible for crime reduction strategies in St. Louis. At times, and as a result, the information the chief and public safety director release can be perceived as inadvertently contradictory.

The Public Information Officer (PIO) also noted the union often speaks out on issues—which may be construed by community members as though the union is speaking for the department. The PIO at times has had to clarify who bears the role of spokesperson for the department. There is a strong belief the union is framing the department in a negative light and attempts to reframe narratives.

9.1   Findings

1. There is a perceived lack of executive communication flowing through the organization. While commanders praised the chief, they noted the need for more direct communication from the chief. While the chief has a lieutenant colonel to help coordinate messaging for his office, some interviewees noted a perceived lack of communication from the chief's office. For instance, one commander said senior command staff meetings lacked clear agendas or discussions about important internal or crime issues, and commanders were left seeking guidance on a long-term crime strategy. Further, the lack of top-down and bottom-up communication has led some to question whether the chief or the public safety director were running the department.

2. Some have noted it is important for the chief to enhance his external image and that assistance with media training could be beneficial toward bolstering his public image.

3. Generally, the unit has a good relationship with the City 's PIO, and members confirm the Office is not required to obtain permission or approval to issue news releases or speak with the media. The SLMPD's PIO, often in association with the Director of Planning and Research, will work with the chief's office in creating presentations, and a member of the PIO will always accompany the chief to incident scenes and events where media may be present. The PIO also works well with other PIOs in the area (including participating in group training), although there are times the Circuit Attorney's Office releases information and does not advise the SLMPD of the release in advance.

4. Since the PIO is not part of executive meetings, he cannot provide input on community and media perceptions of decisions and help prevent potential communication issues.

5. Although the unit is well-resourced, the team admits they are reactive and lack time for strategic planning, to include development of a strategic communications plan and crisis communications plan. The team shared that while they have adequate equipment, a PIO-dedicated space for interviews, news conferences, and video production would be helpful.

6. PIO members are on-call but attend incident scenes infrequently, unless there is an Officer Involved Shooting (OIS) or other critical incident. Incident commanders are empowered to speak with the media at incident scenes and the department has strong guidance in place for the media through their media handbook (detailed in the Media Relations section below) and solid media policies.

7. The department has good relationships with local news media and keeps them abreast of information in a timely fashion during business hours. Media can reach members of the PIO Monday to Friday during business hours via email or phone. The department also has a secure media log-in page on their website that has a listing of current

incident report summaries, which is updated daily during the week. It also has a 9-1-1 Calls for Service page media can access which is updated every 10 minutes.

8. However, gleaning information can be more difficult outside of business hours. After business hours and on weekends, the media contacts the Real Time Crime Center (RTCC) for information. While this has worked for the Department, there is always the concern that media calls will go unanswered, or information will be released (or not released) by staff who are not trained public information officers. Any email requests from the media after regular business hours or on weekends are typically responded to the next business day. PIOs are on-call for the department and will respond to critical incident scenes if requested. However, lieutenants and above, if they are the scene commander, are empowered to offer basic information to the media at an incident scene and provide the PIO with the information they provided.

9. The department hosts social media platforms, to include Facebook (47,500+ followers), Twitter (almost 77,000 followers), Instagram, and YouTube. The department maintains its social media with multiple posts a day, to include video footage. They have also used their digital platforms to correct misinformation or errors the media has made. There is a good balance of information and positive stories and information is posted in a timely manner. The agency is also using Twitter during critical incidents very well, but could make better use of its YouTube channel with more video uploads.

10. Given its social media presence, the department stopped issuing news releases, but rather posts incident summaries to Facebook. Although this is not a best practice, it fulfils the need for speed in today's news cycle, and the Associated Press (AP) style news releases can be easily cut and paste to media outlets' social media pages. The unit also uses social media to share information and video footage during critical incidents. However, the department does not have an ability to track or monitor social media or the ability to archive their posts, and the PIO experiences difficulty obtaining information from district commanders or on-scene commanders at incidents.

11. The public has access to a well-organized and informative website that includes being able to access a Calls for Service page that is populated with calls 30 minutes after they have been closed. However, in conversations with command staff, many believed residents simply don't understand some of the issues and challenges facing their police and believe additional outreach and public information may be useful.

12. There are strong community programs in place across the City, but community outreach is often left to district commanders, resulting in programs with varying levels of engagement, success, and continuity. Programs include a mobile office on wheels, which the chief takes into communities and allows him to meet with neighbors in their own backyards, as well as a Community Advisory Board that meets monthly. Additionally, the department spearheads numerous engagement strategies for youth, including a Gang Resistance Education and Training (GREAT) program, the Police Athletic League (PAL), the St. Louis Metropolitan Clergy Coalition, Homicide Ministerial Alliance (victim services), the Better Family Life Clean Sweep projects, and the Urban League's Save Our Sons program. The PIO works with the Community Engagement Unit and Recruitment Unit on positive engagement activities such as "Operation Polar Cops," a program that has officers distributing ice cream to local youth. The department has a Citizens' Academy, which hosts 22 to 24 people per class and may serve as a talent pipeline and community liaison. However, these programs may be administered differently and with varying degrees of success across districts, and once people graduate from the Citizens' Academy, the department does not maintain contact with alumni.

13. The department does not have a formal internal communications platform or program in place. They rely on their public-facing Facebook site and departmental e-mails to send information. Members of the PIO stated that gleaning positive stories from district commanders to send internally and externally can be difficult, and they are proactive in contacting commanders seeking stories to post to social media. Additionally, the department has not conducted an internal survey to assess employee satisfaction, nor if employees understand the agency's mission, vision, and goals.

14. The PIO is responsible for managing the department's awards and recognitions. Typically, letters of commendation are awarded after CompStat, and local businesses host officer appreciation event in each district. However, interviewees revealed that officers feel they do not receive enough recognition for a job well done, and the regular issuance of recognition and awards has largely been overshadowed by more pressing operational needs, with the exception of individual district commanders who recognize officers.

15. Although district command staff attend monthly community meetings, the department lacks a formalized process by which staff follow up with district commanders around community members' feedback and concerns. As a result, the level of documentation and tactical follow-up varies by district.

9.2   Recommendations

Immediate (Next 3 months)

- Create a crisis manual to guide crisis management and ensure communications are managed appropriately in times of crisis to minimize confusion or misinformation.

- Provide funding for the PIO to purchase social media monitoring and archiving software.

- Add an FTE to the PIO (sworn or civilian) to help manage social media content and extend the hours the PIO is available.

Near-Term (3 to 6 months)

- In coordination with the development of a department strategic plan, develop and implement 18-24-month internal and external communications strategies and plans, to include conducting internal employee surveys to assess morale and gather feedback, as well as external police satisfaction surveys to measure the outcomes of community engagement

- Use internal communications plan to identify and address the various technological platforms for communication (Vlogs, SharePoint Site, Email, etc.) and associated audience groups and types of messaging.

- Reimagine the Community Outreach Section to create a plan and strategy for community engagement and provide various tools for each district commander that fit their communities' needs.

- Elevate Chief Hayden as the face of the SLMPD and its crime fighting and community safety efforts; receive additional media training and executive communications support if needed.

- Develop and formalize a department-wide process for documenting, escalating and following up on community feedback discussed in district meetings.

Long-Term (6 to 12 months)

- Create a forum for senior command to identify and address community and employee concerns and share an overall mission and vision for the department.

- Develop a true brand image for the agency that can be carried through all programs, including recruiting, community outreach, departmental graphics, and social media.

- Work with local businesses and marketing agencies to help create recruiting and marketing campaigns for the department on a pro-bono basis, including a style guide.

10   NEXT STEPS

Teneo Risk is pleased to provide these findings and recommendations as a prioritized list of immediate, near and long-term tactics which the department could begin to put in place to enhance the SLMPD's crime fighting abilities and to facilitate more strategic and collaborative deployment of existing resources— underpinned by leading technologies, enhanced communications and leading practices in department policies.

While Teneo Risk has not had the opportunity to conduct community surveys or spend time with community influencers, people within the organization concede that there is no comprehensive plan for community engagement nor community policing. Teneo Risk would suggest a professional police satisfaction survey be considered for the community, and an internal employee satisfaction survey be conducted internally. Both will serve as baselines as the department moves forward.

When Teneo Risk began this engagement with the SLMPD, the chief expressed his support and cooperation in our efforts to foster greater collaboration, morale and cohesion within the department. Our team has been impressed by the dedication, professionalism, and pride that members of the department have exhibited, particularly in the face of the current climate's physical and psychological burdens, as well as the resourcing and crime challenges unique to the department and City. With a strategic organizational plan, an overarching crime fighting strategy and further streamlining of the resources that the department does have available, the SLMPD can transition from reactive and decentralized crime-fighting to a proactive and holistic approach that can scale and flex to the City, community and department's needs.

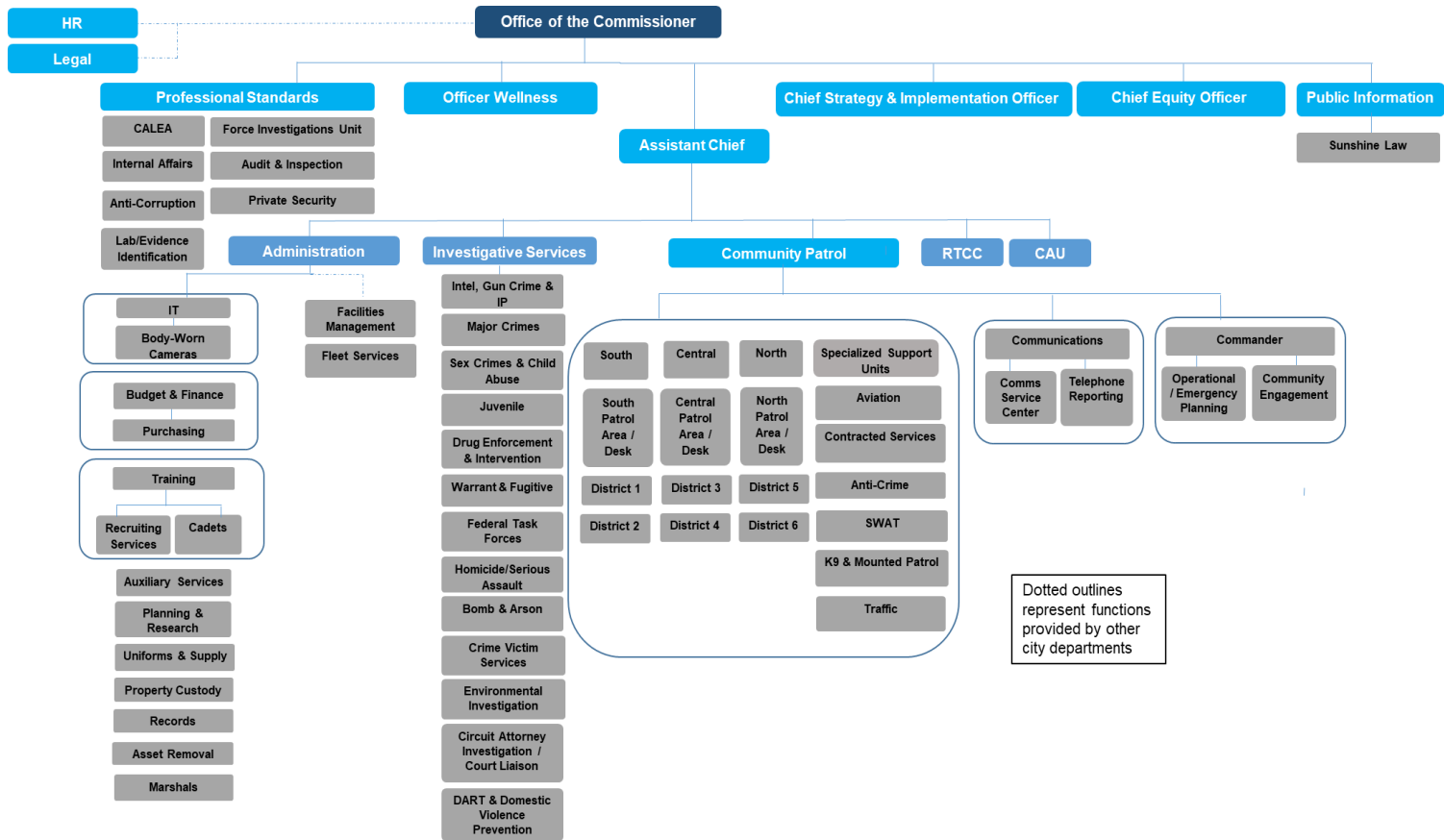# 11   APPENDIX A: USE-OF-FORCE POLICY RECOMMENDATIONS

Relevant Section	Recommendation
Section I of SO 1-01, "Philosophy for Use-of-force and Periodic Review of Policy"; Section B, "Philosophy"	Add as a last sentence to Section B1, "The use of excessive force, unwarranted force or unlawful force is prohibited and will not be tolerated."
Section I of SO 1-01, "Philosophy for Use-of-Force and Periodic Review of Policy"; Section B, "Philosophy"	Add a "Guiding Principle" to Section 4, noting "The St Louis Metropolitan Police Department seeks to gain the voluntary compliance of subjects, when consistent with safety, to eliminate the need to use force or reduce the force required."
Section I of SO 1-01, "Philosophy for Use-of-Force and Periodic Review of Policy"; Section B, "Philosophy"	Add an entire section on de-escalation, all officers if safe and feasible, will be required to use de-escalation techniques to reduce or prevent the need for force. This includes continually assessing the situation and provide examples of de-escalation, such as: a. Exercising persuasion, provide warning b. Time, distance or positioning c. Requesting specialized personnel
Section I of SO 1-01, "Philosophy for Use-of-Force and Periodic Review of Policy"; Section B, "Philosophy"	Add a section entitled, "Prohibitions," which would prevent officers from using force in a discriminatory fashion based on race, sexual preference etc. and protected activities (e.g. First Amendment Rights)
Section I of SO 1-01, "Philosophy for Use-of-Force and Periodic Review of Policy"; Section B, "Philosophy"	Add a section noting that all officers have a duty to report any incidents of unreported force and a further duty to intervene in instances of excessive force and report same to his supervisor
Section I of SO 1-01, "Philosophy for Use-of-Force and Periodic Review of Policy"; Section B., "Philosophy"	Add a section holding officers accountable for: a. Truthfully and completely describing facts and circumstances any incident of force b. Articulating facts that justify officer's decision to use force
Section II of SO 1-01: A. "Definitions"	Define and ban chokeholds
B. "Deadly Force Policy"	Remove provision around destroying seriously injured animals
C. "Restrictions" 7. Drawing or Displaying a Weapon	Create another section, entitled "pointing firearms." This section should cover protocols for pointing firearms and create a reporting mechanism to enforce this provision, notifying operations of pointing and requiring body worn cameras to be examined and documentation of the "seizure" to be required for field interrogation reports or an arrest reports.
Section III of SO 1-01, "Use of Non-Deadly Force" C. "Reporting Use of Non-Deadly Force"	Include a section that requires the officer to notify operations of the use of non-deadly force; and operations to notify the street supervisor to respond and conduct an immediate thorough investigation (to include gathering evidence, identifying and seeking witnesses, ensuring proper medical care, reviewing body worn camera and any other video evidence).
Section IV of SO 1-01 "Use of Non-Deadly Force-Pepper Mace"	At the introduction of each type of non-deadly force, repeat, reinforce and reiterate the need for the least amount of force to overcome the resistance and the need to use de-escalation tactics if feasible.
Section IV of SO 1-01 "Use of Non-Deadly Force-Pepper Mace"	Add a section that would require the officer to justify each deployment of mace.
Section IV of SO 1-01 "Use of Non-Deadly Force-Pepper Mace"	Add a section stipulating that the deployment of mace or any other chemical device during protests, demonstration or any other instance of unrest should include; 1. Warning; 2. Only done with the authorization of Chief of Police or his designee.

	We note that this provision is present in SO 4-02 but should be reiterated.
E-Reporting Use of Pepper Mace	Notify Operations and have supervisor assigned to immediately investigate
Section V of SO 1-01, "Use of Non-Deadly Force - Impact Weapons"	Reiterate the need to use the least amount of force and invoke utmost reverence for life.
Section V of SO 1-01, "Use of Non-Deadly Force - Impact Weapons"	Ensure reporting procedures apply for each use-of-force and specify that efforts at de-escalation need to be documented.
Section V of SO 1-01, "Use of Non-Deadly Force - Impact Weapons"	Add a requirement that officers justify each additional strike with an impact weapon.
Section VI of SO 1-01, "Use of Non-Deadly Force – Conducted Energy Device (CED)"	Reiterate the need to use the least amount of force and invoke utmost reverence for life. Reexamine the conditions CED use is authorized; Section B2b appears to authorize CED use to effect a lawful arrest; however, resistance should be a condition for using CED. Eliminate Section D; force should not be used on fleeing subject who poses no threat and if crime may be minor drug dealing or misdemeanor.
Section VI of SO 1-01, "Use of Non-Deadly Force – Conducted Energy Device (CED)"	Update Reporting Procedures (G9,10) identified in past sections to include taking possession of the Taser, downloading the data and printing the downloaded Taser data as part of the investigative process.
Section VI of SO 1-01, "Use of Non-Deadly Force – Conducted Energy Device (CED)"	Require justification for each Taser deployment.
Section G, "Deployment of Tasers"	Stipulate that officers make no more than three deployments, and utilize other manners of force if three deployments don't work.
Section H, "Post Use Procedures"	Designate medical staff, not officers, as individuals who should remove barbs
Section J, "After Use Reporting"	Consider immediate notification of Operations team and assignment of supervisor to respond, conduct investigation, collect Taser, identify witnesses and submit a report as to whether use was consistent with department policy. Stipulate that all uses of force, to include baton, OC spray and CED, should result in a complete thorough supervisory investigation within 24 hours of the incident. The investigation should mandate that both the sergeant and watch commander review all body-worn camera video captured from all officers present before supervisors declare the investigation to be in compliance with department policy. Stipulate that if investigation not in compliance, supervisor notify IAD.
Section VII of SO 1-01, "Administrative Procedures-Use-of-Force"	Section A General – Firearm Discharged/Other Deadly Force Stipulate a 24-hour report submittal time from the time of the incident, pursuant to the CBA. If not able to adhere to 24-hour window, request all reports be submitted prior to the end of the tour of duty with the possible exception of the officer who did actual discharge.
Section VII of SO 1-01, "Administrative Procedures-Use-of-Force"	Section B – Deadly Force Reporting Require identification of the person responsible for the report submission for accountability purposes. (e.g. "street supervisor")
Section VII of SO 1-01, "Administrative Procedures-Use-of-Force"	2b. Specify details of any and all efforts to identify witnesses; disclose any physical evidence discovered or any witness statements in report. Currently, the report is police-centric and needs more focus on and objectivity around events that precipitated use-of-force. Same can be said of Section C; the only required

	attachments are police-related, while the report's purpose should be accurately portraying events that occurred, rather than serving as an administrative document.
c. Recommendations	Consider in this section clearly stating that all recommendations are subject to the approval of the chief.
C. Non-Deadly Force Reporting	Designate individual who is responsible for submitting report (e.g.officer) and who is responsible for conducting the investigation into the Use of Non-Deadly Force (e.g. supervisor)
E. Department of Personnel, Police Division	Designate all roles and responsibilities around use-of-force practices to chief and command staff; consider eliminating non-policy units from involvement in investigative process outside collecting and analyzing information.
Section VIII of SO 1-01, "Post Shooting Trauma / Serious Physical Harm / Critical Incident Stress Team and Programs"	Consider allocation of coordination with PTST counselors to Operations, rather than the Force Investigations Unit investigators. Ensure Force Investigation Unit (FIU) is focused on investigation rather than other procedural matters. Mandate Force Investigations Unit presence but allow officers to designate time and location.
Section IX of SO 1-01, "Officer Response at Officer Involved Shootings"	Section B – Establishment of Protocols Designate Operations as responsible for the notification of police and non-police and make notification process part of protocols. The list, currently in Section G does not reflect the potential impact officer-involved shooting (OIS) could have on City and department.
Section IX of SO 1-01, "Officer Response at Officer Involved Shootings"	Section D2 – Mandatory Drug and Alcohol Testing Articulate a mandated time when the test should be administered.
Section IX of SO 1-01, "Officer Response at Officer Involved Shootings"	Section D Guidelines – Activation of Video Cameras Determine whether officers should have the right to review their own body-worn camera footage prior to making any statements; if so, any viewing of video should be done only in the presence of the FIU investigator and apply to all cameras responding that may have footage.
Section IX of SO 1-01, "Officer Response at Officer Involved Shootings"	Section F – OIS Investigations Given the impact of an OIS and potential for unrest, consider adding a provision that a command staff member must respond and may take command of the scene (not investigation) and be responsible for scene and decisions, such as removing a deceased subject's body, in exigent circumstances.
Section IX of SO 1-01, "Officer Response at Officer Involved Shootings"	Section G - Notifications Assign responsibility to a sworn member to make notifications to family of subject as soon as possible.
Section IX of SO 1-01, "Officer Response at Officer Involved Shootings"	Section F2 – Responsibilities of Supervisors/Detectives Require all uninvolved officers to submit their reports prior to the completion of their tour of duty and mandate the FIU to assign district supervisors to collect them.
Section X of SO 1-01, "Force Investigation Unit"	Update policy to reflect the makeup of the FIU, qualifications, training and members' direct reports.
Section X of SO 1-01, "Force Investigation Unit"	Section B2 – FIU Responsibilities Consider designating district supervisor to submit the incident report, allowing the FIU to focus on conducting the investigation.
Section X of SO 1-01, "Force Investigation Unit"	Section B3 – Criminal Liability

	Consider inclusion of provision around administrative duty to report to head of Bureau of Investigative Services whether officers complied with department policy.
Section VII Use of Non-Deadly Force - Canine	Consider addition of section to cover conditions under which canines are authorized and, as importantly, when they are not authorized (e.g. at demonstrations)

Proposed Organizational Structure

Office of the Commissioner

HR
Legal

Professional Standards
- CALEA
- Force Investigations Unit
- Internal Affairs
- Audit & Inspection
- Anti-Corruption
- Private Security
- Lab/Evidence Identification

Officer Wellness

Assistant Chief

Chief Strategy & Implementation Officer

Chief Equity Officer

Public Information
- Sunshine Law

Administration
- IT
- Body-Worn Cameras
- Budget & Finance
- Purchasing
- Training
- Recruiting Services
- Cadets
- Auxiliary Services
- Planning & Research
- Uniforms & Supply
- Property Custody
- Records
- Asset Removal
- Marshals
- Facilities Management
- Fleet Services

Investigative Services
- Intel, Gun Crime & IP
- Major Crimes
- Sex Crimes & Child Abuse
- Juvenile
- Drug Enforcement & Intervention
- Warrant & Fugitive
- Federal Task Forces
- Homicide/Serious Assault
- Bomb & Arson
- Crime Victim Services
- Environmental Investigation
- Circuit Attorney Investigation / Court Liaison
- DART & Domestic Violence Prevention

Community Patrol
- South
  - South Patrol Area / Desk
  - District 1
  - District 2
- Central
  - Central Patrol Area / Desk
  - District 3
  - District 4
- North
  - North Patrol Area / Desk
  - District 5
  - District 6
- Specialized Support Units
  - Aviation
  - Contracted Services
  - Anti-Crime
  - SWAT
  - K9 & Mounted Patrol
  - Traffic

RTCC

CAU
- Communications
  - Comms Service Center
  - Telephone Reporting
- Commander
  - Operational / Emergency Planning
  - Community Engagement

Dotted outlines represent functions provided by other city departments

Proposed Modification	Rationale
Reallocation of Auxiliary Services and Technological Solutions & Investigations; Formation of Specialized Support Units and Investigative Services	Consolidate functional groups with similar or complementary workflows to support Community Patrol. Narrow focus of Chief's direct purview to enable him to focus on strategic development and implementation.
Elevation of RTCC and CAU	Drive a more data-based community policing and crime-fighting strategy by empowering divisions that collect and distribute information and ensure more formalized and uniform distribution and utilization of data across district staff, specialized support units and investigative services. Provide more direct oversight through assistant chief to ensure RTCC and CAU staffing, as well as provision of departmental output measures and crime data on emerging trends.
Creation of new role for Chief Strategy & Implementation Officer	Support department in developing and executing on crime-fighting strategy and department strategy, as well as current and future initiatives, such as the technology upgrade. This individual should be charged with working closely with the chief and assistant chief to develop department strategies and then working with key stakeholders across bureaus to oversee their implementation and to provide feedback and updates to the chief. The addition of this role is designed to address the department's current challenges around widespread, timely and systematic implementation of strategic initiatives, as well as modification of department processes based on current community and staffing needs.

Creation of new bureau for Officer Wellness	Maximize impact and reach of current programming and ensure department has resources and oversight to continue developing programming that responds to new challenges in morale and policing. Send message to personnel that the department prioritizes their safety and wellbeing.
Creation of new group for Body-Worn Cameras	Ensure oversight and accountability around new body-worn camera initiative, to include more robust policy and procedure development, as well as collection of feedback and metrics to continually refine policies and procedures, deployment, and utilization.
Creation of new group for Communications; Alignment with Districts and Specialized Support Units	Facilitate greater coordination between command staff, specialized units and communications teams to ensure that department mission, vision, values and community policing strategy are articulated both internally and externally. Provide more strategic and regular two-way communication between department and community.
Consolidation of Intelligence Unit, Gun Crime Intelligence and Intellectual Property	Provide greater flexibility and collaboration in using personnel and resources with overlapping functions.
Consolidation of Homicide and Serious Assault	Provide greater flexibility and collaboration in using personnel and resources with overlapping functions.
Consolidation of DART and Domestic Violence Prevention	Provide greater flexibility and collaboration in using personnel and resources with overlapping functions.
Consolidation of Housing and Public Transportation	Provide greater flexibility and collaboration in using personnel and resources with overlapping functions.
Consolidation of K9 and Mounted Patrol	Provide greater flexibility and collaboration in using personnel and resources with overlapping functions.
Consolidation of Operational Planning and Emergency Management	Provide greater flexibility and collaboration in using personnel and resources with overlapping functions.
Removal of Prisoner Processing; Allocation as Function of Each District	Limit redundancy around procedure development and administration that occurs on a district-level already.