# A Citizen's Guide to the Cleveland Police Consent Decree

*With a Special Focus on Implications for Children & Young People*

*Working Document*
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# Introduction

This Citizen's Guide is intended to provide a general overview of the Consent Decree agreed upon by the City of Cleveland and the Department of Justice. As a summary, it does not provide all of the details of the 105-page Consent Decree, and readers are urged to go to the original document for further detail. The complete Consent Decree, including a fully digitized version that allows searches, can be accessed online at http: / / cleconsentdecree.com / . In addition, there are electronic links to documents and sources throughout this guide to allow the reader to access original materials for more information.

The Guide was prepared especially for young people who are curious about the police reform process in Cleveland and how they may be impacted by these efforts, as well as those who may be interested in becoming involved to ensure a successful reform effort. Section VI of this guide, *"How does the Consent Decree and this reform effort impact the policing of youth?"*, explores why understanding how children and young people are impacted is important and where further opportunities exist for improving interactions between police and youth.

While the Consent Decree makes clear the responsibilities of the Cleveland Division of Police and several other groups, the Cleveland community itself plays a significant stakeholder role in working with the CDP and other partners to improve police-community interactions. The Consent Decree calls on the community to be a part of the reform process through service in various groups and ongoing engagement through public forums. Young people can offer valuable contributions to these community service and engagement roles.

Finally, this guide is a "Working Document" and we invite readers using it to make suggestions for additional information or other improvements. Thank you.

Key to Common Abbreviations:

| | |
|---|---|
| CDP | Cleveland Division of Police |
| CD | Consent Decree |
| CIT | Crisis Intervention Trained |
| CPC | Community Police Commission |
| DOJ | United States Department of Justice |
| DPC | District Policing Committees |
| MHRAC | Mental Health Response Advisory Committee |
| MT | Monitoring Team |
| OPS | Office of Professional Standards |
| PRB | Police Review Board |

# I. Background on the Consent Decree: *How did Cleveland get here?*

## What is the United States Department of Justice?

The U.S. Department of Justice (DOJ) is the government agency responsible for enforcing the Constitution and the laws of the United States federal government.

## Why did the DOJ investigate the City of Cleveland's Division of Police (CDP)?

The DOJ investigated the CDP at the invitation of Mayor Frank Jackson and other concerned citizens due to events involving CDP's use of excessive force in a car chase and shooting incident resulting in the death of the two victims in the car.[1]

After a 21-month long investigation, the DOJ concluded that there was reasonable cause to believe that the CDP **"engages in a pattern or practice of using excessive force in violation of the 4th Amendment of the U.S. Constitution"** (DOJ, 2014). The federal government has the authority to investigate such allegations under the Violent Crime and Law Enforcement Act of 1994, 42 U.S.C. § 14141. Section 14141 makes it illegal for governmental bodies, such as the City of Cleveland and the CDP, to act in a way that violates the constitutional rights of the people that they serve.[2]

## What does the 4th Amendment to the U.S. Constitution say?

*"The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."*

The 4th Amendment includes two important protections which create the rules allowing an officer to search and seize (take) a person, property or place. **These 4th Amendment protections include limits on the use of excessive force**.

**Search** - In order for a police officer to search a person's body, home, personal documents, or belongings they need to either have permission from the person they want to search, or a warrant from a judge. In order to get a warrant from a judge, the officer must have enough evidence to explain why they should be allowed to search without permission. However, there are exceptions to this requirement, for example, when an officer has good reason to believe that a crime is currently taking place.

**Seizure** - A seizure can describe the taking of property by an officer or the taking of a person during an arrest (meaning the person is not free to leave). The 4th Amendment requires that a seizure must be reasonable and cannot involve the use of excessive force.

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[1] http: / / www.ohioattorneygeneral.gov / Files / Briefing-Room / News-Releases / Cleveland-Officer-Involved-Shooting-Investigation / General-Reports / Prosecutor-s-Summary-2-4-2013.aspx

[2] This was not the first time that the DOJ investigated the CDP. In 2002, the DOJ investigated similar allegations of unconstitutional excessive use of force and found that there were serious issues with the CDP's use of force and procedures for investigating officer misconduct. As a result of this earlier investigation, the CDP entered into a 2004 memorandum with the DOJ where they agreed to make changes to their policies and procedures. This memorandum was not court enforceable, had no one monitoring its implementation and did not result in sufficient lasting changes.

## What is the DOJ's role in the CDP investigation?

When an allegation is made that a government institution, in this case the CDP, is violating the constitutional rights of a citizen or group of citizens, the DOJ can take the following steps:

- Investigate the allegation(s);
- Report on the findings;
- If it finds that there has been a violation, develop a legal Consent Decree with the institution to correct the violation (or litigate if no Consent Decree can be reached); and
- Enforce the Consent Decree with court oversight.

## What was the DOJ's process for investigating the CDP?

The DOJ started its investigation of the CDP on March 14, 2013. Its investigation process involved:

- Interviewing citizens, officers, supervisors, City officials, and gathering information through various methods, such as hosting town hall meetings;
- Direct observation through ride-alongs with officers on their patrols; and
- Reviewing CDP's records, training materials, policies and procedures and complaints.

After completing its investigation, DOJ filed its findings report on December 4, 2014.

## What did the DOJ find in its investigation?

The DOJ found that there was reason to believe that the CDP uses a pattern or practice of excessive force in violation of the 4th Amendment of the U.S. Constitution, noting in particular: *"The use of force by police should be guided by a respect for human life and human dignity, the need to protect public safety, and the duty to protect individuals from unreasonable seizures under the Fourth Amendment. A significant amount of the force used by CDP officers falls short of these standards… We have concluded that these incidents of excessive force are rooted in common structural deficiencies" (DOJ, 2014).*

Specifically, the DOJ found:

(1) Use of excessive, unconstitutional force, including:
   a. Unnecessary use of deadly force;
   b. Unnecessary use of less lethal retaliatory (revenge) force;
   c. Excessive force against mentally ill persons; and
   d. The use of dangerous tactics that put officers and civilians at unnecessary risk;

(2) Concerns regarding stops, search and seizure practices;

(3) A lack of:
   a. Officer accountability and training;
   b. Adequate guidance for individuals in crisis;
   c. Effective policies and procedures;
   d. Community engagement; and
   e. Equipment, technology & staff planning.

In its investigation, the DOJ included case examples, noting that these cases comprised only a subset of a broader pattern of excessive use of force. Samples of cases included use of excessive force with children[3] and mentally ill and deaf individuals, among others.

[3] Findings involving children included: **Harold, a 13-year-old boy arrested for shoplifting**. While handcuffed in the back of a squad car, Harold began to kick the door and kicked an officer in the leg. In response, a 300-pound officer entered the car, sat on his legs and punched Harold repeatedly in the face. The DOJ found that the use of force was unreasonable because the youth was handcuffed and did not pose a threat to officers. **Ivan, a 127-pound child,** was chased and tackled by police because they thought he fit the description of a fleeing suspect. Once the two officers had him on the ground, they claimed that Ivan continued to resist arrest, at which time they used

# II. Who are the key players in the Consent Decree?

## United States Department of Justice, Civil Rights Division (DOJ) www.justice.gov / crt

The DOJ is a federal agency that has the authority to investigate and prosecute the City of Cleveland when allegations are made that citizens' constitutional rights are being violated.

The Civil Rights Division of the Department of Justice, created by the Civil Rights Act of 1957, works to uphold the civil and constitutional rights of all Americans, particularly some of the most vulnerable people. The Division enforces federal laws prohibiting discrimination on the basis of race, color, sex, disability, religion, family status and national origin.

The United States Attorney's Office for the Northern District of Ohio is part of the DOJ. The U.S. Attorney for the Northern Division of Ohio, serves as the chief federal law enforcement officer for Ohio's 40 northern counties. www.justice.gov / usao-ndoh

## City of Cleveland and the Cleveland Division of Police (CDP) www.city.cleveland.oh.us / CityofCleveland / Home / Government / CityAgencies / PublicSafety / Police

The Mayor, Frank Jackson, is the top authority for the City of Cleveland for purposes of this Consent Decree, followed by Safety Director Michael McGrath and Chief of Police Calvin Williams. For an updated listing of CDP District Commanders go here.

The mission of the CDP is: *"to enhance the quality of life, strengthen our neighborhoods and deliver superior services with professionalism, respect, integrity, dedication and excellence by working in partnership with our neighborhoods and community"* (CDP, n.d.).

## Federal Judge www.ohnd.uscourts.gov

Chief U.S. District Judge Solomon Oliver Jr. is the federal judge overseeing the case between the DOJ and the City and is responsible for:

- Approving the Consent Decree and ordering the City, CDP and the DOJ to comply with its terms. He approved the Consent Decree on May 26, 2015. This date is referred to as the Consent Decree "effective date";
- Appointing a Monitor to be responsible for the day-to-day oversight of the Consent Decree and reporting to the Court on progress;
- Settling disputes that may come up between the City, CDP and DOJ during the implementation of the Consent Decree; and
- Determining when the City has satisfied the terms of the Consent Decree and when the Consent Decree can be terminated.

their Taser twice in Ivan's back. The DOJ found that the use of the Taser at all under the circumstances was unreasonable considering the size of the child and the fact that he was already under control on the ground.

## Consent Decree Monitor & Monitoring Team www.clevelandpolicemonitor.net /

The Monitor, Mathew Barge, is an expert appointed by the Federal Judge, with authority from the City of Cleveland and the DOJ, to make sure the terms of the Consent Decree are being followed. The Monitor will serve a term of five years, with the possibility of that term being shortened or extended, depending on how long it takes the City to comply with the terms of the Consent Decree. The Monitor also supervises the Monitoring Team.

The Monitoring Team is made up of national and local experts who are to assist the Monitor in fulfilling his responsibilities, which include the following:

- Reviewing the progress of the City and the Cleveland Division of Police (CDP) to determine whether they are meeting the requirements of the Consent Decree which may include providing assistance, advice or other input to help the City and CDP be successful in implementing the Consent Decree;
- Conducting a community survey every two years to get feedback from the community regarding their experiences with the CDP and how they view public safety in the city;
- Making recommendations to the City and the DOJ on changing the Consent Decree to improve its effectiveness;
- Maintaining regular communication with the City, DOJ and the community; and
- Preparing regular reports detailing their findings, recommendations and analysis of the City's and the CDP's progress.

## Other Key Players

## Community Police Commission (CPC) www.clecpc.org /

The CPC is a new entity created by the Consent Decree to better ensure community engagement in police reforms. The CPC is made up of 13 individuals who live and / or work in Cleveland: 10 appointed by the Mayor and three selected by corresponding police associations. The Consent Decree required the following categories be represented by these 13 individuals: faith based organizations, civil rights advocates, the business / philanthropic community, organizations representing communities of color, advocacy organizations, youth or student organizations, academia and individuals with expertise in the challenges facing people with mental illness or the homeless. The goal of the CPC is to act as a link between the City, the CDP and the community. The CPC's role is to, at minimum:

- Hear the concerns of the community and communicate those concerns to the City, CDP and DOJ;
- Make policy recommendations to the City and the CDP that encourage bias-free, honest and community driven policing; and
- Report to the City and the community regarding the status of the reform process.

## District Policing Committees (DPC)

There are five police districts in the City of Cleveland. Each district has its own DPC that is made up of community members from that district and at least one officer who works in that district. The goal of the DPC is to encourage regular communication between the CDP and local community leaders. DPC's role is to, at minimum:

- Develop strategies to address the crime and safety issues in their district; and
- Encourage a stronger relationship between the members of the community and their local CDP officers.

## Police Inspector General

The Police Inspector General is a new position created by the Consent Decree to provide internal oversight of the CDP to make sure that CDP's policies and practices are consistent with state and federal law and the terms of the Consent Decree. The Police Inspector General may not be a current or former employee of the CDP.

## Mental Health Response Advisory Committee (MHRAC) adamhscc.org / en-US / settlementagreement.aspx

The MHRAC is an entity created by the Consent Decree and is made up of mental health and substance abuse treatment / recovery providers and stakeholders, the community and the police, under the Alcohol Drug Addiction and Mental Health Services Board of Cuyahoga County. The goal of the MHRAC is to encourage a better understanding among law enforcement of mental illness and related crisis situations and to develop strategies for officers to use when they encounter a person who is having a mental health crisis. The MHRAC will also make recommendations to the CDP regarding its policies, procedures and training regarding officer contact with people in crisis.

## Cleveland Community

The Cleveland community is the most important stakeholder in the reform process. "Community" appears over 125 times in this Consent Decree. The Consent Decree came about because the people of Cleveland wanted changes in the way that their communities were policed. They wanted more transparency, better officer training, accountability measures for officer misconduct and reform regarding the CDP's use of force policies. The Consent Decree calls for significant changes in how the CDP operates. It also calls on the community to be a part of the reform process through service on the CPC, PRB, DPCs, MHRAC and by attending local community meetings in order to share concerns, experiences and make recommendations for policy change.

# III. How will a Consent Decree lead to reform in Cleveland and within the Cleveland Division of Police?

## What is a "Consent Decree," and why is it also referred to as a "Settlement Agreement"?

A "Consent Decree" is a court-enforceable agreement that ends a dispute or a lawsuit between parties. It details a plan the parties agree to use in order to correct the problem(s) that caused the dispute or made the lawsuit necessary. In Cleveland, this plan is referred to as both the "Settlement Agreement" and "Consent Decree." The important factor is that the plan is enforced by a court of law.

## What is the goal of the Consent Decree between the City of Cleveland and the DOJ?

The goal of the Consent Decree is to repair community trust and protect the constitutional rights of the people of Cleveland by:

1. Identifying problems within the CDP;
2. Creating and implementing policies and practices to correct those problems;
3. Defining consequences for officer and / or CDP failure to follow the rules of the Consent Decree; and
4. Creating a process to monitor the CDP to make sure the terms of the Consent Decree are being enforced.

## When did the Consent Decree become effective?

The Consent Decree went into effect on June 12, 2015, when Chief U.S. District Judge Solomon Oliver, Jr. signed the order approving the Consent Decree.

## When does the CDP have to start implementing the terms of the Consent Decree?

The Consent Decree requires that the CDP begin to correct the problems right away and has a number of deadlines that the City, CDP and the DOJ must meet in order to comply with the terms of the Consent Decree. Up-to-date annual implementation timelines can be found on the Monitoring Team's website under "Monitoring Plan."

## How long does the City/ CDP have to do what the Consent Decree requires?

The Consent Decree has implementation deadlines that start as soon as June 12, 2015 (the Consent Decree effective date) and currently extend as far as 5 years (until 2020), with a number of deadlines built in throughout the five-year timeframe. However, it is possible that the terms of the Consent Decree could be met sooner than 5 years or require more time.

The City can ask that the Consent Decree be terminated once the CDP has been in compliance for one year with search and seizure practices and two consecutive years for all other provisions.

# IV. How does the Consent Decree seek to improve police-community interactions?

The Consent Decree includes a number of major areas of police reform. This summary focuses on the following areas: (1) Use of Force & De-Escalation, (2) Bias in Policing, (3) Handling Individuals in Crisis, (4) Search & Seizures, (5) Transparency & Reporting Systems, (6) Community Building and (7) Community & Problem-Oriented Policing. The following chart highlights the key findings from the DOJ investigation in each of these areas, specific goals for improvement noted in the Consent Decree, strategies required by the Consent Decree to meet the improvement goals and the key players with responsibilities.

| ISSUE AREA | DOJ FINDING | GOAL FOR CDP IMPROVEMENT | CONSENT DECREE STRATEGIES TO MEET IMPROVEMENT GOALS | | KEY PLAYERS |
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| 1. Use of Force & De-Escalation | CDP has a pattern or practice of using excessive force including:<br>• Unnecessary deadly force;<br>• Retaliatory force;<br>• Force against the mentally ill or people in crisis; and<br>• Use of dangerous tactics that put officers in situations where force could have been avoided but becomes inevitable. | To create use of force policies, training, supervision, and disciplinary measures to ensure that force is used in ways consistent with the Constitution and laws. To ensure officers use techniques other than force to effect compliance when possible. To use force only when necessary and in a way that avoids unnecessary injury. To de-escalate the use of force at the earliest possible moment. | Policy Change & Training | 1. De-escalation tactics: Officers will allow persons the time to submit to arrest before using force. Officers will be trained in negotiations, waiting people out, creating distance between the officer and a threatening person, and how to consider other issues that may result in a person 's lack of cooperation (i.e. language barrier, disability, mental health crisis, or a health emergency).<br>2. Appropriate Use of Force: Officers will only use the amount of force needed to reasonably control a person. As the person's resistance decreases, the amount of force will also decrease.<br>3. Inappropriate Use of Force: Officers will not engage in the following use of force tactics:<br>a. Force against persons who only verbally confront them and do not interfere with the officers ability to perform his duty;<br>b. Retaliatory Force- officers cannot punish persons for being "disrespectful," running, or resisting arrest;<br>c. Head strikes with hard objects (unless lethal force is justified); and<br>d. Neck holds.<br>4. Weapons Training: All officers must undergo training on all CDP weapons that they are authorized to use.<br>5. Medical Care: Immediately following a use of force, officer must immediately obtain any necessary medical care and, if needed, perform emergency first aid until medical care providers arrive on scene. | Cleveland Division of Police (CDP), Community Police Commission (CPC), U.S. Department of Justice (DOJ) and Cleveland Police Monitoring Team (MT) |
| | | | Reporting | CDP will develop a reporting system to record each time an officer uses force. There are three use of force levels, each with its own investigative process. Details can be found in the Consent Decree.<br><br>Officers found to have used excessive force, or who did not include important details in their use of force report, will face disciplinary action. Supervisors who do not | CDP, Police Review Board (PRB), MT and Office of Professional Standards (OPS) |

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| | | | | properly or timely investigate claims of excessive use of force also will face disciplinary action. | |
| 2. Bias in Policing | CDP services are not consistently administered in a way that is fair, respectful, and free from unlawful bias towards members of the Cleveland community. | To deliver police services equitably, respectfully and free of unlawful bias, and in a way that promotes broad community engagement and confidence in CDP, and without discrimination based on race, ethnicity, national origin, religion, gender, disability, age, sexual orientation or gender identity. | Policy Change & Training | CDP will develop bias-free policing policy and procedures that incorporate CPC recommendations and provide clear guidance to officers that biased-policing, including detaining people solely on racial stereotypes, is prohibited.<br><br>Officers training to include:<br>1. Negative impact of racial or ethnic profiling;<br>2. How to identify personal bias, and ways to reduce the harmful impact of bias;<br>3. The law under the U.S. Constitution requiring equal protection and prohibiting unlawful discrimination, protection of civil rights as a central part of the police mission, and principles of procedural justice; and<br>4. Ways to interact positively and respectfully with people in the community.<br><br>Supervisors will also be trained on how to identify bias when reviewing officer stops, arrests and use of force data. | CDP, CPC, DOJ, MT |
| 3. Handling Individuals in Crisis | CDP officers and CDP call takers are inadequately trained to assess and handle the needs of persons experiencing a mental health crisis. | To build upon and improve CDP's Crisis Intervention Program in order to assist individuals in crisis; improve safety; promote solutions to assist those with mental illness; and reduce criminal justice system involvement. | Policy Change, Training & Personnel | 1. The CDP will create a Crisis Intervention Coordinator position. This person will have the responsibility of:<br>a. Overseeing the crisis intervention training of officers;<br>b. Making sure officers, call takers and dispatch are properly responding to crisis calls; and<br>c. Maintaining and developing partnerships with mental health partners.<br>2. All officers and recruits will receive at least eight hours of crisis intervention training annually.<br>3. The development of a team of specialized crisis intervention officers with at least 40 hours of training.<br>4. The creation of the Mental Health Response Advisory Committee (MHRAC) to foster relationships and build support between the police, the community and mental health providers, to help identify problems and solutions to improve outcomes for those in crisis and to provide guidance to CDP in its CIT program.<br>5. The CDP will develop new policies and procedures detailing how crisis intervention calls should be handled, documented and reported to the public. | CDP, DOJ, MHRAC and MT |
| 4. Search & Seizures | CDP has a practice of unlawful stops, searches, and seizures that often violate the Fourth Amendment. | To conduct investigatory stops, searches, and arrests in compliance with the law and "fairly and respectfully" | Policy Change & Training | 1. Officers will not:<br>a. Use "gender, race, ethnicity, national origin, or perceived sexual orientation as a sole factor in establishing reasonable suspicion or probable cause;"<br>b. Stop individuals without reasonable suspicion;<br>c. Perform pat down searches without specific facts that would reasonably suggest that the person is armed (unless the officer is conducting the search with intent to arrest); | CDP, CPC, DOJ, PRB, MT, and OPS |

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| | | taking into account "community values." | | d. Use an individual's location in a high crime area as the only reason for a stop.<br>2. Documentation and Review:<br>a. Officers must document all stops, even if they do not result in an arrest;<br>b. Officer reports will be reviewed by their supervisor;<br>c. Any clear violation in an officer's stops, searches, or arrests will result in disciplinary action; and<br>3. Officers will be trained annually on proper search and seizure practices. | |
| 5. Transparency & Systems of Reporting, Documenting, and Investigating Civilian Allegations of Police Misconduct<br><br>(Internal Accountability measures not included here but can be found in the Consent Decree at: pages 43-57) | CDP does not have an effective system for reporting, documenting, and investigating civilian allegations of officer misconduct. | To ensure that all civilian complaints are fully investigated and appropriate disciplinary action is taken. | Training | The Office of Professional Standards (OPS)<br>1. OPS investigators will be trained to:<br>a. Fully investigate all complaints of officer misconduct; and<br>b. Use high level investigation methods to ensure that all investigations are thorough and complete. | CDP, Internal Affairs, PRB, MT and OPS, |
| | | | Policy Change | Filing, Tracking & Managing Complaints<br>1. CDP will:<br>a. Publicize the complaint process to the public;<br>b. Increase the number of ways that complaints can be filed (i.e. by phone, in writing, verbally, online, or with or without a signature);<br>c. Require all officers to carry complaint forms with them in their CDP vehicles, and give the form to a person who wants to file a complaint;<br>d. Require all officers to provide their name and badge number upon request; and<br>e. Make complaint forms available in English and Spanish.<br>2. OPS will:<br>a. Create a numbering and tracking system for all complaints;<br>b. Produce at least one public report each year that gives a summary of the types of complaints received, how the complaints were resolved, the length of the investigation and the number of complaints that were dismissed; and<br>c. Create a system for evaluating the seriousness of the complaints.<br>3. Communication with the Person Filing the Complaint – OPS will:<br>a. Send the person filing the complaint written updates on the status of the investigation and review; and<br>b. Provide the person filing the complaint contact information to OPS. | |

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| 6. Community Engagement / Trust Building | The DOJ, the City and the CDP recognize that community trust and input are essential to ensuring public safety and improved relations between the community and the CDP. | To ensure that the people of Cleveland are able to engage in the reform process, the CDP will create formal and informal ways to ensure ongoing communication. | | 1. Establishment of a Community Police Commission (CPC) that consists of 13 diverse Cleveland residents representing specific backgrounds (3 from law enforcement). The CPC will:<br>a. Hold town hall meetings throughout the City to hear the concerns of Cleveland residents;<br>b. Complete an assessment of the CDP's bias-free policing policies, practices, and training and make recommendations; and assist in bias-free training;<br>c. Review and comment on CDP policies and practices related to use of force, search and seizure, and data collection and retention; and<br>d. Report to the community and the City on the reforms and any recommendations for improvements.<br>2. Revitalizing the CDP District Policing Committees (DPC) to facilitate regular communication and cooperation between the CDP and community. Recruit membership to expand representation from a cross-section of the community. | CDP, CPC, CRB, DPCs and members of the Cleveland community |
| 7. Community & Problem-Oriented Policing | The DOJ, the City and the CDP agree that communities are safer when there is a strong partnership between members of the community and the police. | To strengthen the relationship between CDP and members of the Cleveland community through officer engagement. | Develop Policing Model & Training | 1. Develop and implement a comprehensive community and problem-oriented policing model in order to promote and strengthen partnerships in the community, ensure collaborative problem-solving and increase confidence in CDP.<br>2. Ensure officers are familiar with the geographic areas they serve to engage in problem identification and solving activities with community groups.<br>3. Train officers in:<br>a. Crime prevention through community engagement and problem-solving strategies;<br>b. Establishing partnerships and engaging organizations, including youth, LGBT, homeless and mental health communities;<br>c. Effective communication skills (i.e. conflict resolution and de-escalation strategies); and<br>d. Principles of procedural justice, conflict resolution, verbal de-escalation, cultural competency and sensitivity training. | CDP, CPC, MT |

# V. How does the Consent Decree make sure the police are doing their job well?

The Consent Decree requires the CDP to make changes in the following areas in order to improve the supervision and accountability in how officers do their job:

- Reporting
- Documenting
- Investigating
- Disciplining Officer Misconduct

It also requires that the CDP have sufficient resources available to them, including equipment and technology, to do their job.

## What are CDP officers required to report?

Misconduct - Any CDP employee (officer, staff, or administrator) who witnesses or becomes aware of the misconduct of another employee must report the incident to a supervisor or internal affairs.

- The CDP will create a system that allows employees to secretly report possible employee misconduct.
- CDP will prohibit any form of retaliation, intimidation, or any negative action against any person, civilian, or officer who reports misconduct.
- If a CDP employee fails to report an incident of misconduct, or engages in any form of retaliation, they will be subject to disciplinary action up to and including termination.

Use of Force- All officers who use or witness another officer's use of force are required to complete a written use of force report before the end of their shift. The report must detail:

1. What happened from the reporting officer's point of view;
2. The reason why the police were there;
3. A description of the events that led to the use of force;
4. The type of resistance that the officer received; and
5. A complete description of the type of force used or observed.

Any officer who uses or observes force and does not report it will face disciplinary action, up to and including termination.

## What are officers required to maintain and document?

The Consent Decree requires that the CDP document and maintain either in writing or electronically all of the following:

- Officer Training
- Officer Evaluations
- Officer Corrective Action (disciplinary and non-disciplinary)
- Incidents Involving Use of Force
- Searches, Seizures and Investigative Stops
- Misconduct Investigations
- Civilian Complaints
- Body Cameras (optional but suggested)

## What types of incidents must be investigated?

1. Use of Force- All incidents involving use of force will be investigated according to the level of force that was used. The Consent Decree creates three use of force levels. Each level has its own investigation process.
2. Officer Misconduct- CDP's Internal Affairs will investigate all internal allegations of officer misconduct. CDP 's Office of Professional Standards (OPS) will investigate civilian complaints of officer misconduct.
3. Other Investigations- The CDP Inspector General will conduct investigations at the request of the Chief of CDP, or the Mayor. The CPC can make recommendations to the Chief of CDP, the Director of Public Safety, or the Mayor for the Inspector General to conduct specific investigations.

## What type of discipline can an officer face for misconduct?

Officers can receive two types of corrective action: disciplinary and non-disciplinary.
Disciplinary action includes: verbal warning, written warning, suspension, or termination.
Non-disciplinary action includes: training, or other actions taken to help an officer improve his or her performance.

According to the Consent Decree, officers can face disciplinary action for:

- Use of unreasonable force;
- Leaving out or misrepresenting information that is included in their use of force report;
- Failing to properly investigate officer use of force (as an investigatory supervisor);
- Officer misconduct; and
- The intentional failure to activate body worn cameras.

## Who is responsible for making sure the police do their job well?

The Consent Decree establishes and / or clarifies specific positions or entities responsible for carrying out specific functions in the plan. The following chart summarizes the roles and duties of the following:

- Force Review Board (FRB)
- Force Investigation Team (FIT)
- Police Review Board (PRB)
- Office of Professional Standards (OPS)
- Crisis Intervention Coordinator
- Data Collection and Analysis Coordinator
- Consent Decree Implementation Unit (within the CDP)

Special positions and entities responsible for making sure the police do their job well:

| Position | Role | Duties & Responsibilities and Enforcement Authority under the Consent Decree |
|---|---|---|
| Force Review Board (FRB) | FRB's role is to oversee use of force investigations. FRB will be made up of the Chief of Police (or someone he selects in his place); a police training supervisor; a representative from the Office of Professional Standards; and a representative from Internal Affairs. | The FRB will review all Force Intervention Team and Level 2 use of force investigations.<br><br>FRB has the authority to make non-disciplinary corrective actions; and refer cases that require disciplinary action to the appropriate unit within CDP |
| Force Investigation Team (FIT) | Each FIT will be a team of officers who will be responsible for investigating officer use of force (the FIT will not be a new unit to which officers are permanently assigned but will be made up of officers from various units). | FIT will conduct administrative and criminal investigations of:<br>• All Level 3 uses of force;<br>• Uses of force involving possible criminal behavior by an officer;<br>• All instances where a person died while in, or as a result of being in police custody; and<br>• Any other use of force instances assigned to FIT.<br><br>FIT has the authority to conduct use of force investigations; and recommend to Internal Affairs whether or not there is evidence of officer misconduct. |
| Police Review Board (PRB) | The PRB will work closely with the Office of Professional Standards (OPS) in investigating and reviewing civilian complaints against CDP officers. The PRB will not review civilian complaints that allege criminal wrongdoing (these go to Internal Affairs). The PRB will be made up of Cleveland residents from diverse backgrounds. Members cannot be current or former members of the CDP. PRB meetings are open to the public. | The PRB will:<br>• Hear the OPS investigator's findings, and conclusions regarding their civilian complaint investigation;<br>• Question the OPS investigator and request additional investigation if necessary; and<br>• Make a written determination as to whether or not there was officer wrongdoing.<br><br>The PRB will have the authority to make recommendations to the Chief of Police or the Public Safety Director regarding whether any disciplinary or non-disciplinary action should be taken against the officer(s) involved in the investigation. |
| Office of Professional Standards (OPS) | Civilian complaints of criminal wrongdoing are reviewed by internal affairs. All other complaints are reviewed by OPS. They can be submitted online, at a local police station, district office, over the phone and verbally. Also, officers are required to carry reporting forms with them in their vehicles. | See Section IV. (above) for OPS requirements under the Consent Decree to develop an effective system for reporting, documenting and investigating civilian allegations of officer misconduct, as well as communications with persons filing complaints. |

| | | |
|---|---|---|
| Crisis Intervention Coordinator | The Crisis Intervention Coordinator will be a link between the CDP and members of the mental health community. Their goal is to increase the success of the CDP's Crisis Intervention Program. | The Crisis Intervention Coordinator will:<br>• Build and maintain relationships with members of the mental health community;<br>• Coordinate the implementation of the policy changes made by the MHRAC with the CDP;<br>• Ensure that all CDP officers, call takers and dispatchers are trained on how to properly respond to a crisis; and<br>• Select officers to be specially trained as Crisis Intervention Trained (CIT) officers. |
| Data Collection and Analysis Coordinator | The Data Collection and Analysis Coordinator will collect and maintain all data related to the CDP's use of force practices, and search and seizure practices. The goal of this role is to encourage transparency between the CDP and the Cleveland community. | The Data Collection and Analysis Coordinator will:<br>• Oversee the collection and tracking of all documents related to CDP use of force and alleged officer misconduct;<br>• Create a system for tracking and maintaining:<br>1. Force related documents,<br>2. All vehicle stops,<br>3. Investigative stops, and<br>4. Searches, even when the encounters did not result in arrest; and<br>• Regularly report the data they collect to the Chief of Police, FRB, OPS and the Police Inspector General.<br><br>All CDP audits, reports and outcome analyses related to the implementation of this Consent Decree will be made publicly available, including at the City and CDP websites, to the extent permitted by law. |
| Consent Decree Implementation Unit | The Consent Decree Implementation Unit will coordinate the City's and the CDP's compliance with the Consent Decree. | The Consent Decree Implementation Unit will:<br>• Provide the DOJ and the Monitor with CDP data, documents and any other required materials, as needed; and<br>• Make sure that the above named documents are maintained according to the terms of the Consent Decree.<br><br>The Consent Decree Implementation Unit has the authority to assist in assigning tasks to CDP employees in order to ensure compliance with the Consent Decree. |

## What is the review process for new CDP policies and procedures?

The Community Police Commission has a specific duty to review CDP policies related to use of force, bias-free policing, search and seizure and data collection and make recommendations for the DOJ and Monitor to consider in its review and final recommendations.

The MHRAC is responsible for reviewing and making recommendations concerning the crisis intervention policies, for the CDP, as well as the DOJ and Monitor, to consider.

Broader community feedback on the CDP policies is also required, which can involve public surveys, public meetings or other methods. The court has final authority in approving the CDP policies related to the Consent Decree.

Once approved, the CDP is required to review each of the new policies related to the Consent Decree 6 months after it goes into effect, and once a year after that, to make sure the policy is effective and determine whether any updates or revisions are needed.

## What does the Consent Decree say about improving the quality of policing?

Recruitment, officer and supervisor training, performance evaluations and promotions are all part of improving quality.

### Recruitment and Hiring

The CDP will review and update its recruitment and hiring program in an effort to make sure they are attracting and hiring a diverse group of qualified people. The CDP agrees to take the following steps in order to achieve this goal:

- Develop a strategic plan to recruit more diverse applicants to the police force;
- Require psychological testing and medical examination to determine a person's fitness for employment;
- Conduct background checks, criminal and civil;
- Review the personnel files from previous employers; and
- When a person has previous law enforcement experience, review the person's history of use of force, use of force training and complaint history.

### Officer Training

CDP will provide officers with training in the following areas:

- Strategies on policing effectively and safely according to CDP policy;
- The legal requirements of the Consent Decree, Ohio law, the Constitution and the laws of the United States;
- Use of force procedures and policies, including de-escalation techniques;
- Weapons training, including firearms, pepper spray (OC spray), tasers (electronic control weapons) and any other weapon that an officer is authorized to use;
- Crisis intervention strategies; and
- Bias-free policing and community engagement strategies.

## Documentation of Training

CDP must:

- Document all officer training;
- Develop a system to track and maintain an accurate record of the training that all CDP officers have received; and
- Put in place policies that require all officers to complete the required training in a timely manner.

## Training of Supervisors

CDP will provide supervisors with training to ensure their ability to effectively supervise the officers that report to them. Supervisors will be expected to:

- Respond to, investigate and properly document incidents involving the use of force;
- Make sure that officers are working with the community in an effort to increase community trust;
- Review arrest reports to make sure that proper procedures were followed; and
- Provide leadership, counseling, redirection and support to officers as needed.

CDP will hold supervisors directly responsible for the quality and effectiveness of their supervision.

## Performance Evaluations

The CDP will continue to conduct annual officer performance evaluations. The Consent Decree adds additional areas of assessment to the current evaluation. Officers who perform well will be considered for promotions. Officers who perform poorly will be identified and addressed by CDP.

## Promotions

The CDP will develop a fair promotions practice that promotes officers who are effective and professional. The Consent Decree details the criteria for considering an officer for promotion (see Consent Decree, pg 73, para. 318).

# VI. How does the Consent Decree and the CDP reform effort impact the policing of youth?

## Why is a specialized approach to policing children and youth important?

Youth-Police Relationships Matter

- Police regularly encounter children and youth, whether through informal stops of youth, warn and release, formal arrests, or children witnessing interactions between police and their peers, parents or other family members.
- How children and young people perceive and the degree to which they trust the police and the criminal justice system is largely informed by their personal encounters with law enforcement.
- Police have a uniquely powerful opportunity to positively influence children and young people through their first responder and justice system gatekeeper roles.

Children and Teenagers are Developmentally Different from Adults

- Brain science sheds light on how a youth ' s cognitive differences leads them to prefer and be more likely to engage in risky behaviors:
    - Teens have less capacity for self-regulation in emotionally charged situations.
    - Teens have a heightened sensitivity to external influences, such as peers and perceived immediate rewards.
    - Teens have less ability to anticipate consequences and make decisions that require an appreciation of the future.
- Unresolved trauma, especially in early childhood, can lead to long term impacts that influence how children behave, especially in stressful situations.
- Experimentation and novelty-seeking behavior are developmentally-appropriate behaviors that most youth mature out of beyond adolescence. However, these behaviors, such as alcohol and drug use, can make a situation more reckless.
- The juvenile justice system is based on the recognition that children and adolescents are developmentally less mature than adults and require special legal and procedural protections and opportunities for rehabilitation.

Police-Youth Interactions Can be Challenging

- Unintended Consequences of Unnecessary Stops: Multiple intrusive stop and frisk practices by police are not only traumatic and anxiety inducing for children and youth (Geller et al. 2014), but may have the unintentional effect of increasing delinquency. This is because of what is called a negative labeling effect -- when youth perceive that they are seen as guilty by police no matter what they do or how they respond, they may be more likely to engage in future delinquency (Wiley, 2013).
- Overestimates of Age: Studies show black children, and in particular black boys 10-years old and older, are seen as older (on average 4.5 years older) and less innocent than white children (Goff, 2014), which can negatively impact how police perceive and treat them.
- False Confessions by Youth: One study of juvenile wrongful convictions found youth were almost twice as likely to falsely confess than adults (Tepfer, 2010). Using developmentally appropriate interviewing techniques can ensure fairness with youth and more reliable statements (IACP, 2011).
- Fairness and Caring: Being treated fairly matters a lot to young people. Youth are less likely to reoffend if they feel the system and its authority figures has been fair to them. Ensuring more positive interactions with police can improve youth attitudes about authority, legal

cynicism and legitimacy, can lead to more positive perceptions of police and can assist in gaining long-term trust of young people (Fagan and Tyler, 2005).

## What is a "developmentally-appropriate" approach to policing?

Effectively working with children and youth requires special skills, knowledge and practices. A "developmentally-appropriate" approach demonstrates a general understanding of the unique social, emotional, physical, neurological, behavioral and moral aspects of development in childhood through adolescence, in order to effectively use age-appropriate communication, de-escalation and intervention tactics on minors. This includes an understanding of trauma and how childhood trauma can impact police interactions with youth. A developmentally-appropriate approach should be built into CDP policies and procedures, practices and training.

## How does the Consent Decree address ways that children and youth are policed?

- Youth have a voice in the community engagement process. The Consent Decree recognizes the value of having youth in positions to influence policy, provide oversight and improve relations between young people and the CDP. The CPC and District Policing Committees have designated spots for youth / student community members.

- The CDP is implementing a community policing approach. The Consent Decree requires the CDP to put in place a community and problem-oriented policing model that focuses on building relationships and trust with community members. While not youth-specific, children and youth are certainly included in "community," and can benefit from the CDP's implementation of this policing approach.

- There are restrictions on the types of weapons that can be used on youth. The Consent Decree prohibits the use of an electrical control weapon (taser) on children unless lethal force is appropriate. This requirement recognizes the unique vulnerability of children and requires officers to use less violent measures when attempting to make an arrest on a child.

- Officers will receive special training on de-escalation strategies. The Consent Decree requires that officers be trained in de-escalation techniques to reduce the need for force. These techniques include: giving warnings, using verbal commands and negotiation skills, waiting the person out, creating distance between the officer and the threat and requesting additional services when a person shows signs of being in a mental health crisis. Officers will also be trained to consider other possible reasons for a person's failure to comply with their orders, such as: hearing or language barrier, medical or mental health issue, emotional crisis, or drug interaction. While this provision is not youth-specific, the de-escalation training could incorporate age- and developmentally-appropriate techniques to ensure more effective de-escalation with youth.

- Officers are prohibited from using certain types of force. Officers may not use force:
    - Against a person who is handcuffed or otherwise restrained;
    - Against a person who only verbally confronts them;
    - To restrain a person who is not suspected of criminal conduct; or
    - That is more than what is necessary to control the person they are arresting.

  Officers also cannot use "retaliatory force" – Retaliatory force is force that is used to punish a person for resisting arrest, or "disrespecting" officers.

These provisions are not youth-specific; however, some scenarios may be more common with children and young people, such as youth being verbally aggressive or behaving in ways that may appear disrespectful. Training that encourages CDP officers to use strategies that do not involve force will positively impact the interactions between the CDP and youth in the community. These could be strengthened with youth-specific policy requirements and age- and developmentally-appropriate training techniques.

- New search and seizure policies: The Consent Decree requires that when an officer seeks consent for a search, the officer let the person know that they have the right to refuse consent at any time.

  The Consent Decree prohibits the CDP from:
  - Conducting investigative stops when they lack reasonable suspicion that a person is committing a crime;
  - Using a person's race, gender, ethnicity, national origin, or sexual orientation as a factor to justify an investigative stop (unless this information is part of a credible description with other factors);
  - Using a person's presence in a high crime area as justification for an investigative stop; and
  - Conducting pat down searches without reasonable suspicion that the person is armed and dangerous (unless the search is part of an arrest prior to transport).

  While these provisions are not youth-specific, they can protect youth from illegal searches and restrict CDP's use of stop and frisk techniques, which may involve youth. These could also be strengthened with youth-specific policy requirements, including interview and interrogation of youth, and age- and developmentally-appropriate training techniques.

- Officers are required to have annual Crisis Intervention Training. Improving interactions and safety where a person is in a mental health crisis is another priority. While the Crisis Intervention process is not youth-specific, it does provide an opportunity for the CDP to incorporate policing strategies that are trauma-informed and reflect an understanding of child and adolescent development, especially as it may relate to behavioral health issues impacting police-youth interactions.

- A system of reporting, documenting and investigating police interactions with youth is required. One of the current challenges to understanding the impact policing practices have on youth is the lack of an adequate system for collecting and maintaining data related to youth interactions with the police. The Consent Decree addresses this by requiring detailed reporting of all arrests, use of force incidents and allegations of officer misconduct. This includes demographic data about the person involved. The Consent Decree also creates requirements for officer supervision and internal investigation processes.

  These measures are not youth-specific, however, they increase the amount and improve the quality of data that is collected, maintained and reviewed by the CDP, the Monitor, PRB, CPC and the DOJ. The Consent Decree requires that all officer reports include the actual or perceived age of the individual. As a result, department-wide, age specific reporting will be available for analysis. This data can help to more clearly identify the specific policing issues impacting Cleveland youth.

## What additional changes could further improve interactions and the relationship between CDP and youth?

POLICY: Adopt youth-specific comprehensive policy concerning police-youth interactions to ensure these interactions are informed by principles of child and adolescent development, an understanding of juvenile specific law and a commitment to positive role-modeling and relationship building between law enforcement and youth. Specific guidance to include:

- Developmentally-appropriate de-escalation techniques;
- Age-appropriate language in stops, searches, arrests of youth and Miranda warnings;
- Questioning and interviewing techniques consistent with the International Association of Chiefs of Police (IACP) guidance on interview techniques with minors; and
- Use of force practices that are objectively reasonable as necessary to control a minor.

TRAINING: Provide youth-specific police training that incorporates principles of child and adolescent development and that is designed to ensure safe and effective communications and interactions between police and youth. Topics to include:

- Child and adolescent development, brain development, impact of trauma and behavioral health issues;
- Implicit bias implications with youth;
- Best practices on interacting with youth, including age-appropriate de-escalation and interview and interrogation strategies; and
- Juvenile law, the Juvenile Justice system and Community Resources and Diversion.

PRACTICES: Adopt trauma informed policing practices that include:

- Eliminating the unnecessary use of "stop and frisk" with youth and promoting warn and release, diversion and other non-custodial strategies; and
- Implementing strategies to minimize child trauma during the arrest of a parent / family member and to improve procedural justice with youth.

CULTURE & COMMUNITY-BUILDING: Infuse principles of age- and developmentally-appropriate/youth-specific policing into the culture of the CDP by building it into law enforcement management, policies and procedures, recruitment, training, personnel evaluations, promotions, resource deployment, tactics and accountability systems.

Police can play a strong role in promoting trust and community-building with youth, their families and community partners through on-going dialogue with youth and positive interactions, and they should be encouraged and rewarded for doing so. In addition, community partners, including youth diversion programs, children's behavioral health providers and other positive youth development programs, should be encouraged to support CDP in connecting youth to available community resources.

Finally, while not CDP specific, efforts should be made by community leaders and partners to ensure that the role of police in and near schools promotes positive school connection and success for students and discourages criminal justice system involvement of students, and that schools do not rely on law enforcement for general school-related discipline matters.

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