



Path To Reform

Report to Judge Morgan
On NOPD Progress Under
The Consent Decree

January 2019

Loyola University New Orleans School of Law

Full & Effective Compliance

- **486.** To ensure that the requirements of this Agreement are properly and timely implemented, the Court shall retain jurisdiction of this action for all purposes until such time as the City has achieved ***full and effective compliance*** with this Agreement and maintained such compliance for no less than two years. At all times, the City and NOPD shall bear the burden of demonstrating full and effective compliance with this Agreement. . . .

Path To Full
& Sustained
Compliance

NOPD implements reforms required by Consent Decree

OCDM conducts section-by-section assessments and identifies areas in Full & Effective Compliance

Once *the Court* finds *all sections* in Full & Effective Compliance, NOPD enters into a "Sustainment Period"

NOPD must maintain Full and Effective compliance with ALL sections of the Consent Decree *for two years*

Paragraph 456: Comprehensive Assessment

- “Two years after the effective date, **the Monitor shall conduct a comprehensive assessment** to determine whether and to what extent the outcomes intended by this Agreement have been achieved, and any modifications to the Agreement that are necessary for continued achievement in light of changed circumstances or unanticipated impact (or lack of impact) of the requirement. This assessment also shall address areas of greatest achievement and the requirements that appear to have contributed to this success, as well as areas of greatest concern, including strategies for accelerating full and effective compliance. . . .”



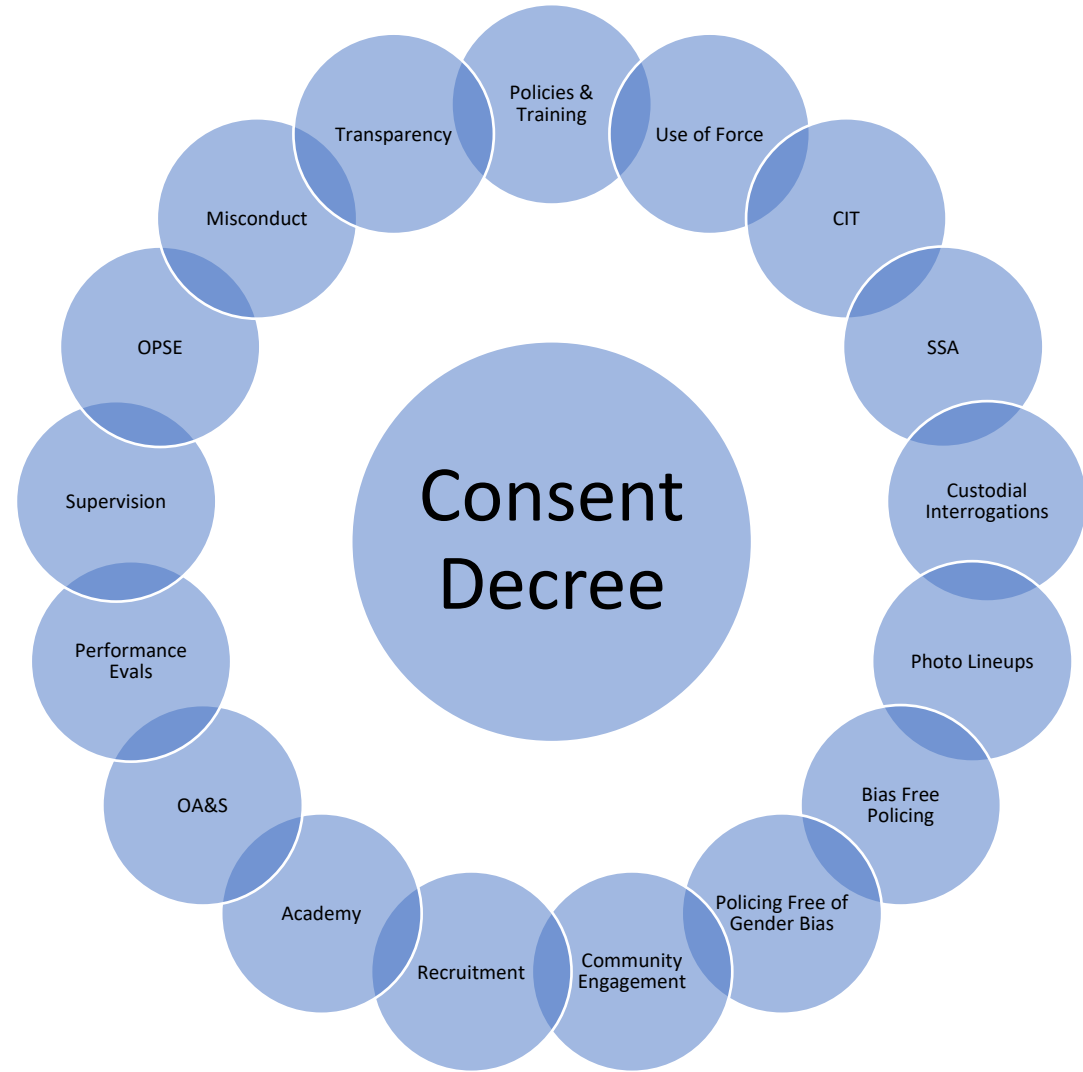
Executive Summary

- NOPD continues to make significant progress in every area of the Consent Decree
- Multiple areas have achieved Full & Effective Compliance
- NOPD leadership deserves significant credit for bringing the Department this far
 - Their continued commitment will be critical to getting the Department to the finish line
- Some CD areas still require additional work
 - Some of these areas are significant
 - But progress continues to be made even in these areas

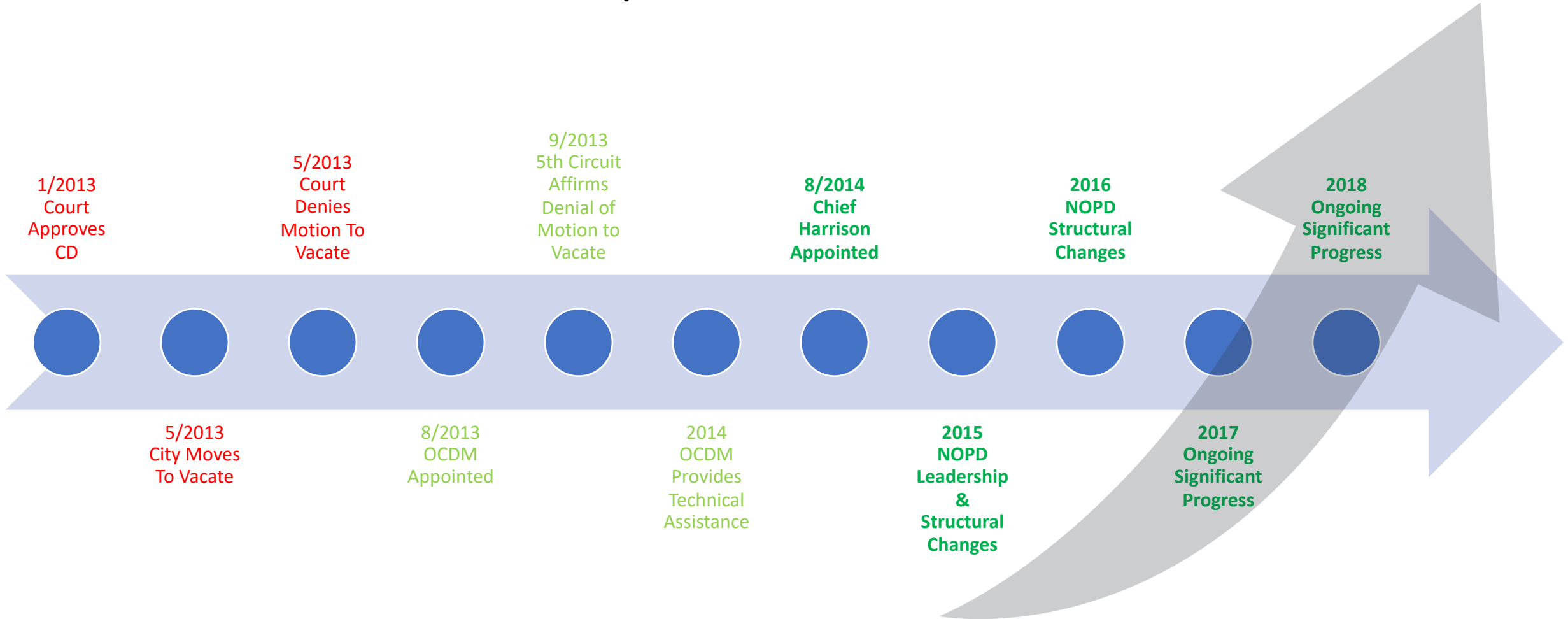
Agenda

- Introduction
- Consent Decree Overview
- Abbreviated Compliance Timeline
- Current Status Overview
- Summary Of Sections In Or Nearing Full And Effective Compliance
- Summary Of Sections Requiring Additional Attention
- Factors Contributing To Success
- Path Forward
- Conclusion

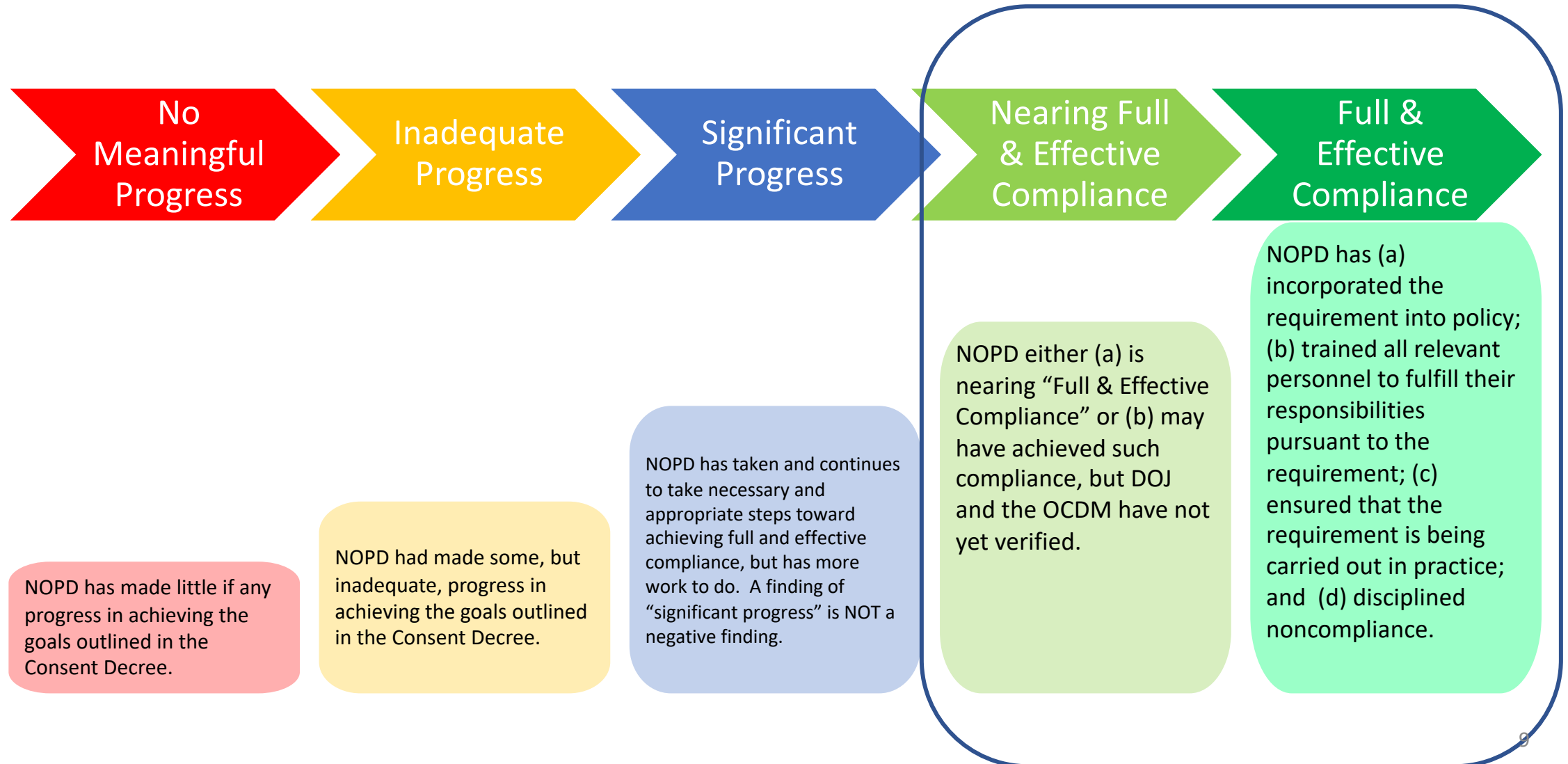
NOPD Consent Decree



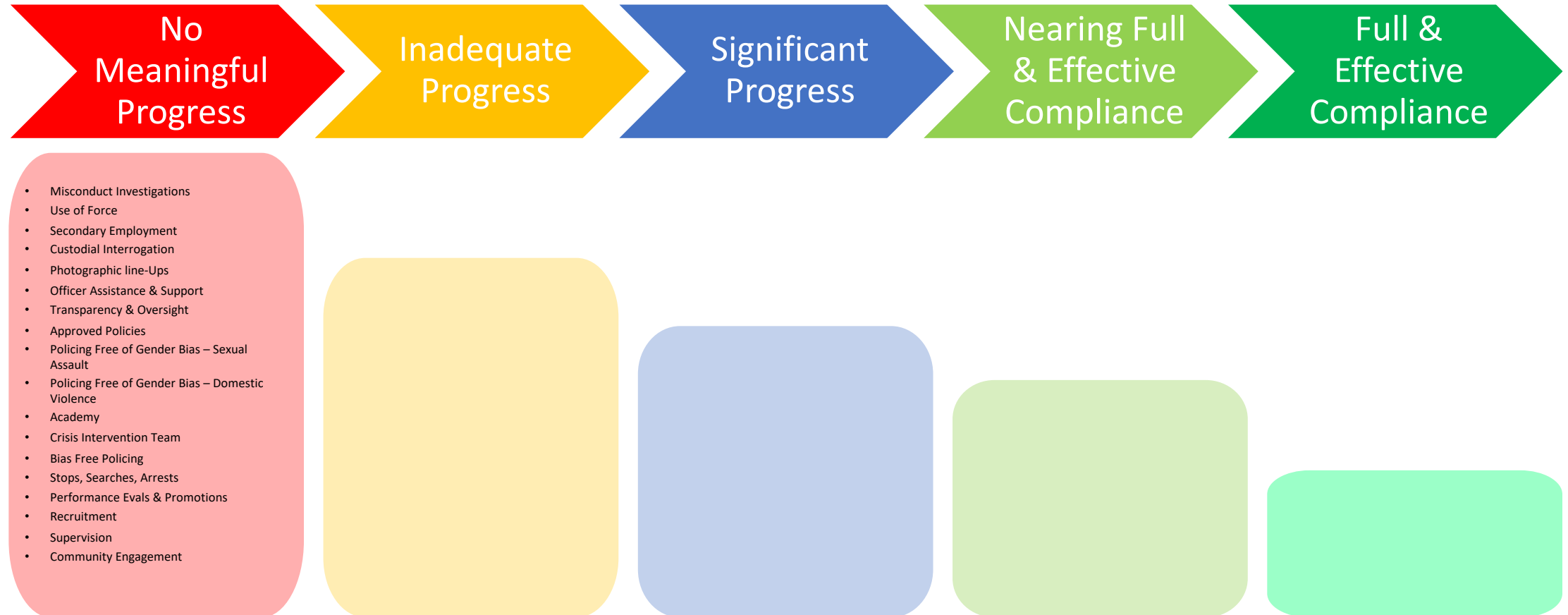
Abbreviated Compliance Timeline



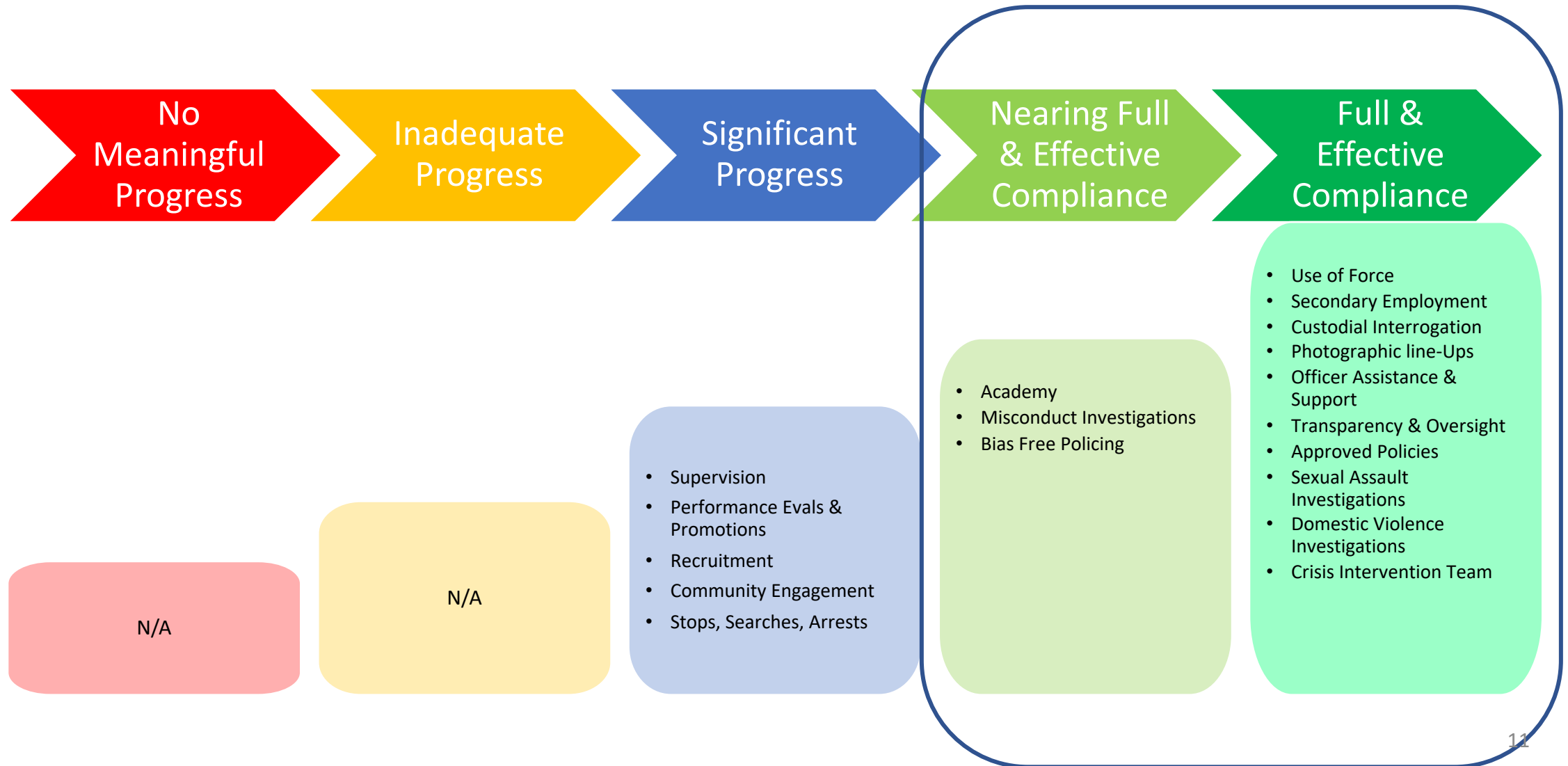
Path To Reform



Path To Reform -- 2011



Path To Reform -- 2019





Section By Section Highlights

Use Of Force

- “NOPD agrees to develop and implement force policies, training, and review mechanisms that ensure that force by NOPD officers is used in accordance with the rights secured or protected by the Constitution and laws of the United States, and that any unreasonable uses of force are identified and responded to appropriately. NOPD agrees to ensure that officers use non-force techniques to affect compliance with police orders whenever feasible; use force only when necessary, and in a manner that avoids unnecessary injury to officers and civilians; and de-escalate the use of force at the earliest possible moment. To achieve these outcomes, NOPD agrees to implement the requirements set out below.”

Use of Force

NOPD Reform Highlights

- New policies / training
- Effective Use of Force Review Board (UFRB)
- Effective Force Investigation Team (FIT)

OCDM Findings

- Increase in appropriate usage of Body-worn cameras during use of force incidents
- All use of force incidents reviewed by FIT
- Use of force violations handled appropriately

Illustrative Data

- No 2017/2018 canine bites or off-lead deployments
- No unjustified 2017/2018 shootings of individuals
- UOF complaints significantly down

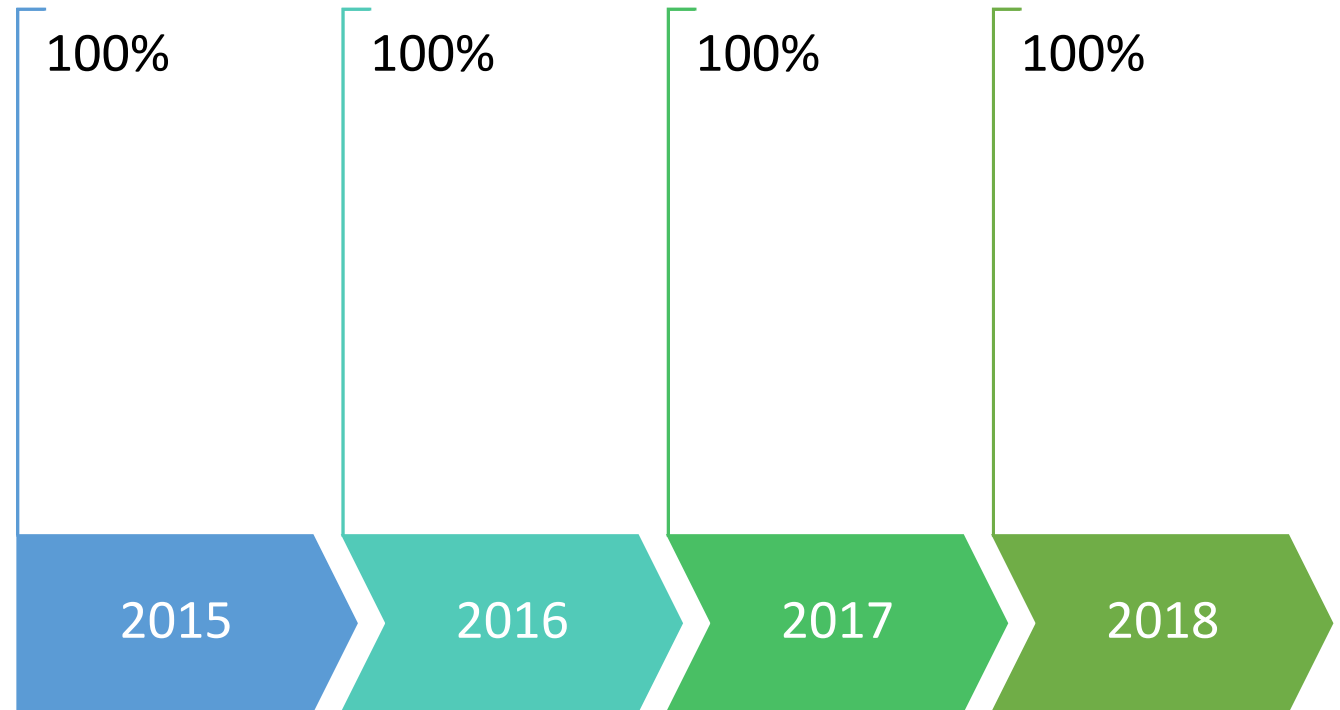
Ongoing NOPD Commitments

- Continue robust UFRB
- Routine policy review/updates
- Continued coordination with Independent Police Monitor (IPM)

NOPD Officer-Involved Shootings

Year	Persons	Animals	Accidental	Total
2012	9	9	2	20
2013	9	3	1	13
2014	8	2	1	11
2015	8	3	1	12
2016	3	2	2	7
2017	3	0	2	5
2018	0	1	3	4

Percentage of
NOPD's Use of
Force
administrative
investigations in
which each NOPD
finding is
supported by the
evidence



Use of Force Review Board Highlights

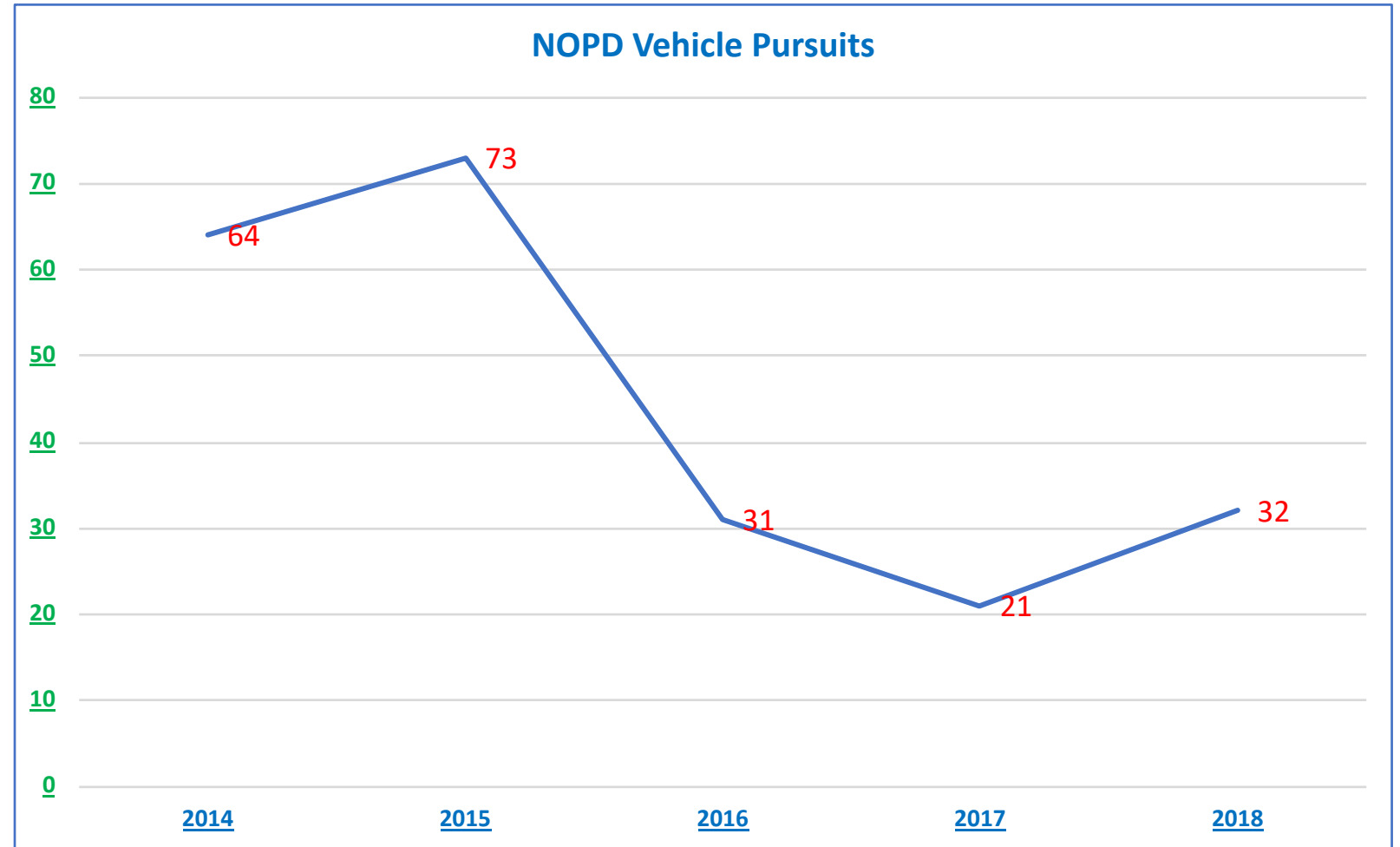
- Board reviews all serious uses of force and other FIT investigations
- Serves as quality control mechanism to determine the appropriateness of the investigative findings and to evaluate incident from a tactical, training, policy, and agency-improvement perspective
- The UFRB process is in addition to any other review or investigation
- The Monitoring Team has observed most UFRB proceedings and has been impressed by the Board's candor, thoroughness, and effectiveness
- The Monitoring Team continues to audit to ensure NOPD follow-through on UFRB recommendations



Canine Bite
Metrics

Year	Deployments	Bites
2012	105	6
2013	124	7
2014	111	12
2015	129	10
2016	77	4
2017	60	0
2018	56	0

Vehicle Pursuit Statistics





Property Damage Resulting from Vehicle Pursuits

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Light	11	5	1	2	0
Moderate	2	5	4	1	1
Heavy	1	2	1	0	1
Total	14	12	6	3	2

Crisis Intervention Team (CIT)

- “NOPD agrees to minimize the necessity for the use of force against individuals in crisis due to mental illness or a diagnosed behavioral disorder. To achieve this outcome, NOPD agrees to implement the requirements set out below.”

Crisis Intervention Team (CIT)

NOPD Reform Highlights

- Implemented Memphis CIT model
- Established effective CIT Committee
- Implemented effective training

OCDM Findings

- CIT training is effective
- Officers are proud to wear CIT pin
- CIT officers are effective on scene

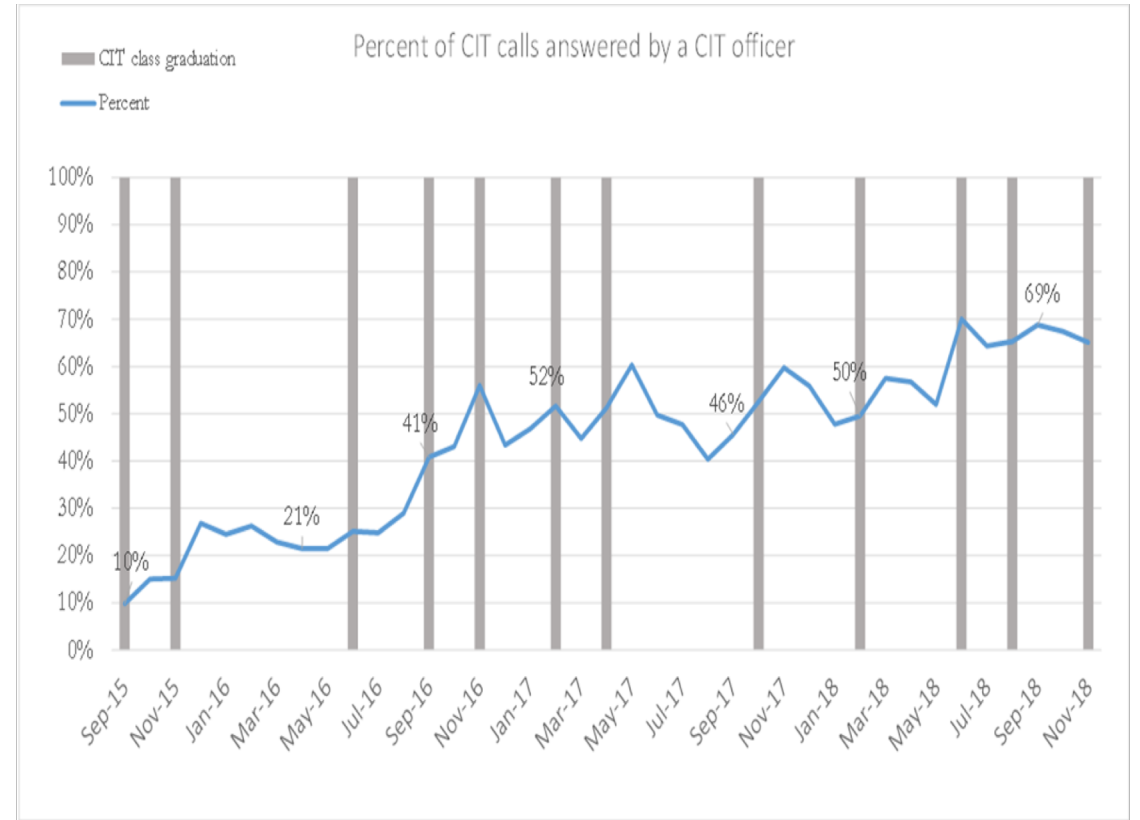
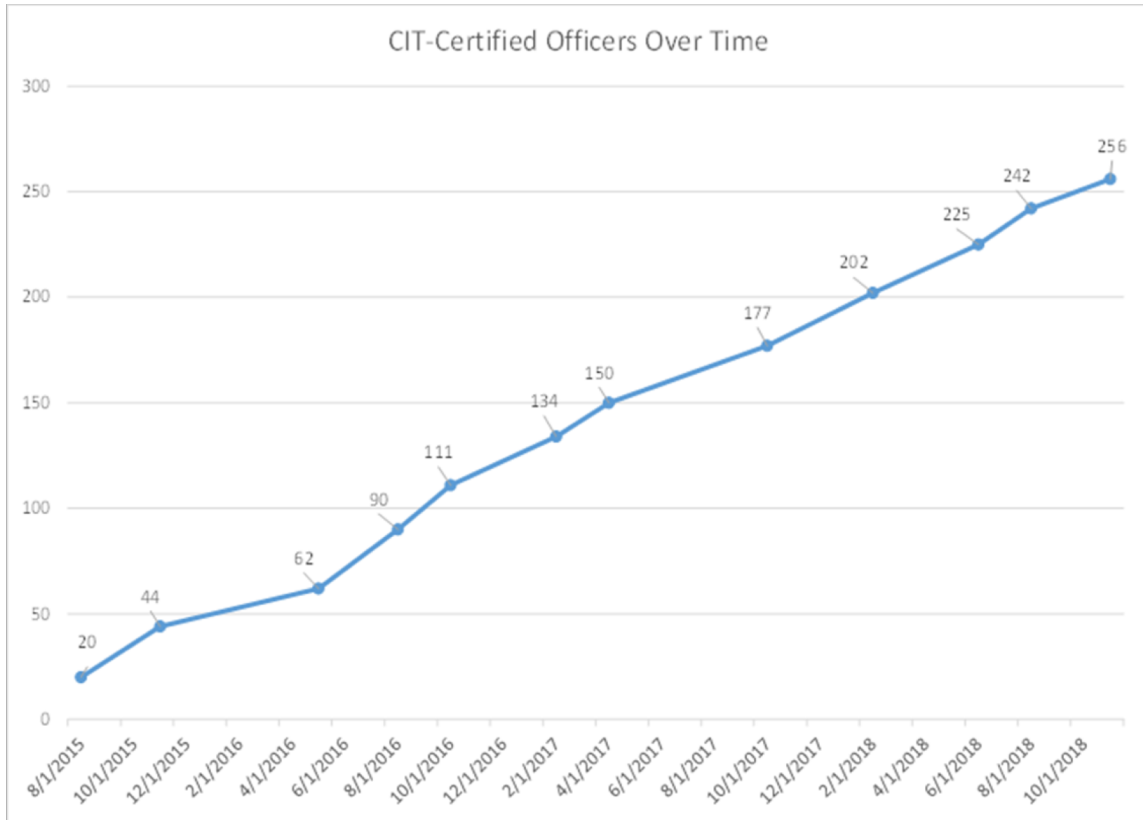
Illustrative Data

- Patrol officers trained: 256
- CIT certified officers: 37%
- Most recent OCDM audit: 100%

Ongoing NOPD Commitments

- Continue conducting internal audits
- Continue to update training with new best practices
- Strive to exceed 40% CIT trained

Illustrative CIT Statistics



Custodial Interrogations

- “NOPD agrees to ensure that officers conduct custodial interrogations in accordance with the subjects’ rights secured or protected by the Constitution and laws of the United States, including the rights to counsel and against self-incrimination. NOPD agrees to ensure that custodial interrogations are conducted professionally and effectively, so as to elicit accurate and reliable information. To achieve these outcomes, NOPD agrees to implement the requirements set out below.”

Custodial Interrogations

NOPD Reform Highlights

- Designated room with functioning audio/video
- Enhanced training
- Compliant facilities

OCDM Findings

- Compliant policies
- Compliant training
- Compliant practices

Illustrative Data

- Complaints since 2015: 2
- OCDM audit results: 100%
- Interrogations recorded & logged: ALL

Ongoing NOPD Commitments

- Maintain recording equipment
- Maintain log
- Conduct internal inspections

2014 NOPD Compliance Score for Custodial Interrogations Paragraphs

Districts	163	164	165	166	167	168
District 1	N	N	N	N	N	N
District 2	N	N	N	N	N	N
District 3	N	N	N	N	N	N
District 4	N	N	N	N	N	N
District 5	P	P	N	N	N	N
District 6	N	N	N	N	N	N
District 7	N	N	N	N	N	N
District 8	P	P	P	N	P	N
Homicide	C	C	C	N	C	N
SVS	N	N	N	N	N	N
SOD	*	*	*	*	*	N

Key:

C = Compliant

P = Partial
Compliance

N = Not
Compliant

2017/2018 NOPD Compliance Score for Custodial Interrogations Paragraphs

Key:
 C = Compliant

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 Compliant

Districts	163	164	165	166	167	168
District 1	C	C	C	C	C	C
District 2	C	C	C	C	C	C
District 3	C	C	C	C	C	C
District 4	C	C	C	C	C	C
District 5	C	C	C	C	C	C
District 6	C	C	C	C	C	C
District 7	C	C	C	C	C	C
District 8	C	C	C	C	C	C
Homicide	C	C	C	C	C	C
SVS	C	C	C	C	C	C
SOD	C	C	C	C	C	C

Photographic Line-Ups

- “NOPD agrees to ensure that photographic line-ups are conducted effectively and in accordance with the rights secured or protected by the Constitution and laws of the United States, so as to elicit accurate and reliable information. To achieve this outcome, NOPD agrees to implement the requirements set out below.”

Photographic Lineups

NOPD Reform Highlights

- Double-blind lineups
- New process for filler photos
- Witness statements recorded

OCDM Findings

- Compliant policies
- Compliant training
- Compliant practices

Illustrative Data

- Tracking logs: 100%
- Lineups recorded: 100%
- Records maintained: 100%

Ongoing NOPD Commitments

- Explore new documentation technologies
- Maintain all recording equipment
- Conduct regular internal inspections

2014 NOPD Compliance Score for Photographic Line-Ups Paragraphs

Key:
C = Compliant

P = Partial
Compliance

N = Not
Compliant

Districts	171	172	173	174	175	176
District 1	N	N	N	N	N	N
District 2	N	P	N	N	N	N
District 3	N	N	N	N	N	N
District 4	N	N	N	N	N	N
District 5	N	N	N	N	N	N
District 6	N	N	N	N	N	N
District 7	N	N	N	N	N	N
District 8	P	C	C	N	P	N
Homicide	C	C	P	C	N	N
SVS	N	C	C	P	P	C
SOD	*	*	*	*	*	*

2017/2018 NOPD Compliance Score for Photographic Line-Ups Paragraphs

Districts	171	172	173	174	175	176
District 1	C	C	C	C	C	C
District 2	C	C	C	C	C	C
District 3	C	C	C	C	C	C
District 4	C	C	C	C	C	C
District 5	C	C	C	C	C	C
District 6	C	C	C	C	C	C
District 7	C	C	C	C	C	C
District 8	C	C	C	C	C	C
Homicide	C	C	C	C	C	C
SVS	C	C	C	C	C	C
SOD	C	C	C	C	C	C

Key:

C = Compliant

P = Partial
Compliance

N = Not
Compliant

Policing Free of Gender Bias

- “NOPD agrees to respond to and investigate reports of sexual assault and domestic violence professionally, effectively, and in a manner free of gender-based bias, in accordance with the rights secured or protected by the Constitution and laws of the United States. NOPD agrees to appropriately classify and investigate reports of sexual assault and domestic violence, collaborate closely with the DA and community partners, including the NOFJC, and apply a victim-centered approach at every stage of its response. To achieve these outcomes, NOPD agrees to implement the requirements set out below.”

Sexual Assault Response and Investigations

NOPD Reform Highlights

- SVS housed in NOFJC
- Sexual Assault Response Team (SART) – successful multidisciplinary taskforce
- Dedicated NOPD leadership having a positive impact

OCDM Findings

- Policies implement best practices
- Training is effective
- Remarkable post-2014 turnaround
- Case files in excellent order
- Few complaints

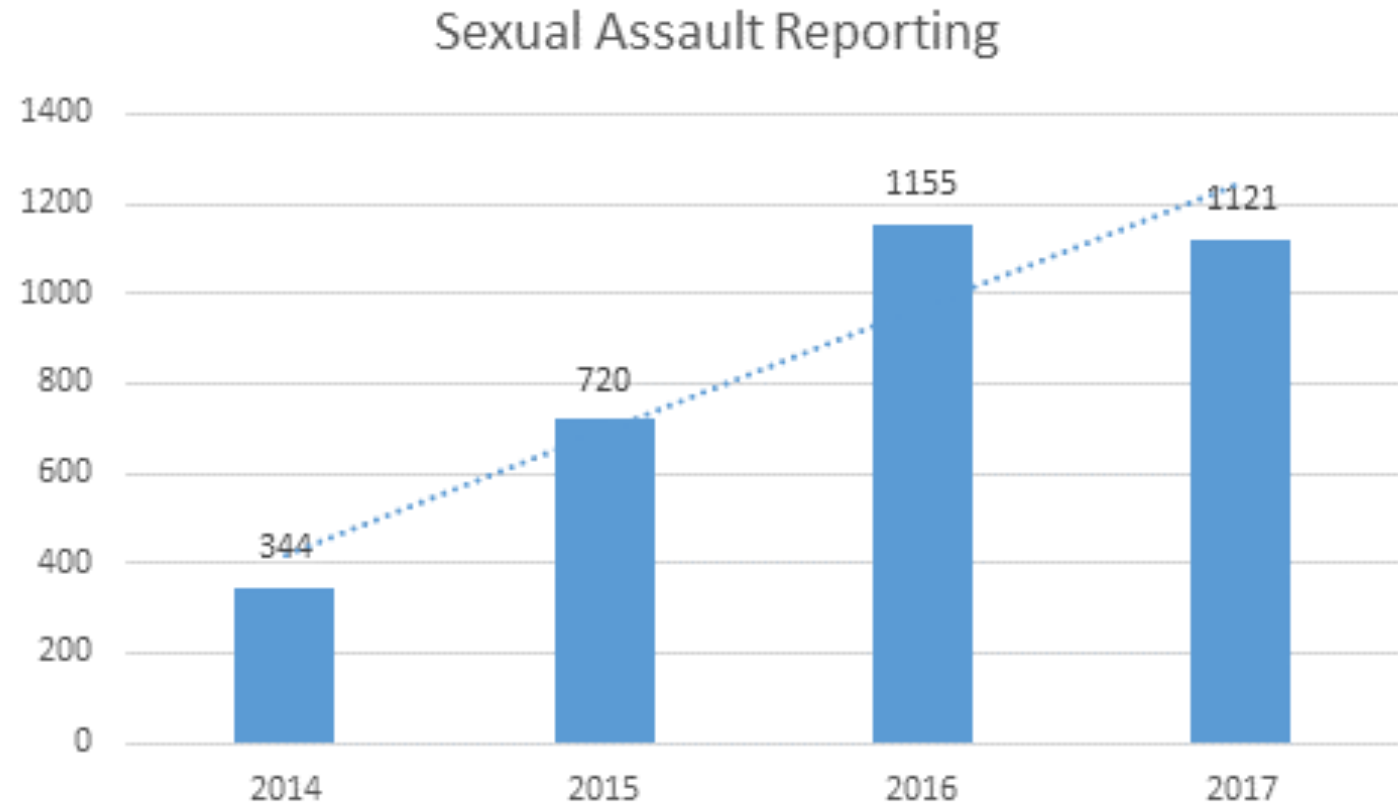
Illustrative Data

- SVS Practices Audits: Near 100%
- Case File Audits: Near 100%
- NOFJC Case worker Feedback: Extremely Positive
- Increased reporting indicates public trust, proper reporting, and more accurate clearances by officers

Ongoing NOPD Commitments

- Regular internal audits
- Continued engagement with stakeholders
- Maintain sufficient number of investigators

Sexual
Assault
Reporting



Domestic Violence Response and Investigations

NOPD Reform Highlights

- Effective supervision
- Qualified / committed staff
- DV detectives co-located with NOFIC
- Work closely with D.A. office prosecutor

OCDM Findings

- Policies incorporate national best practices
- Patrol response dramatically improved
- Training is effective
- Signal change and response times audits positive
- Dual arrest figures substantially lower

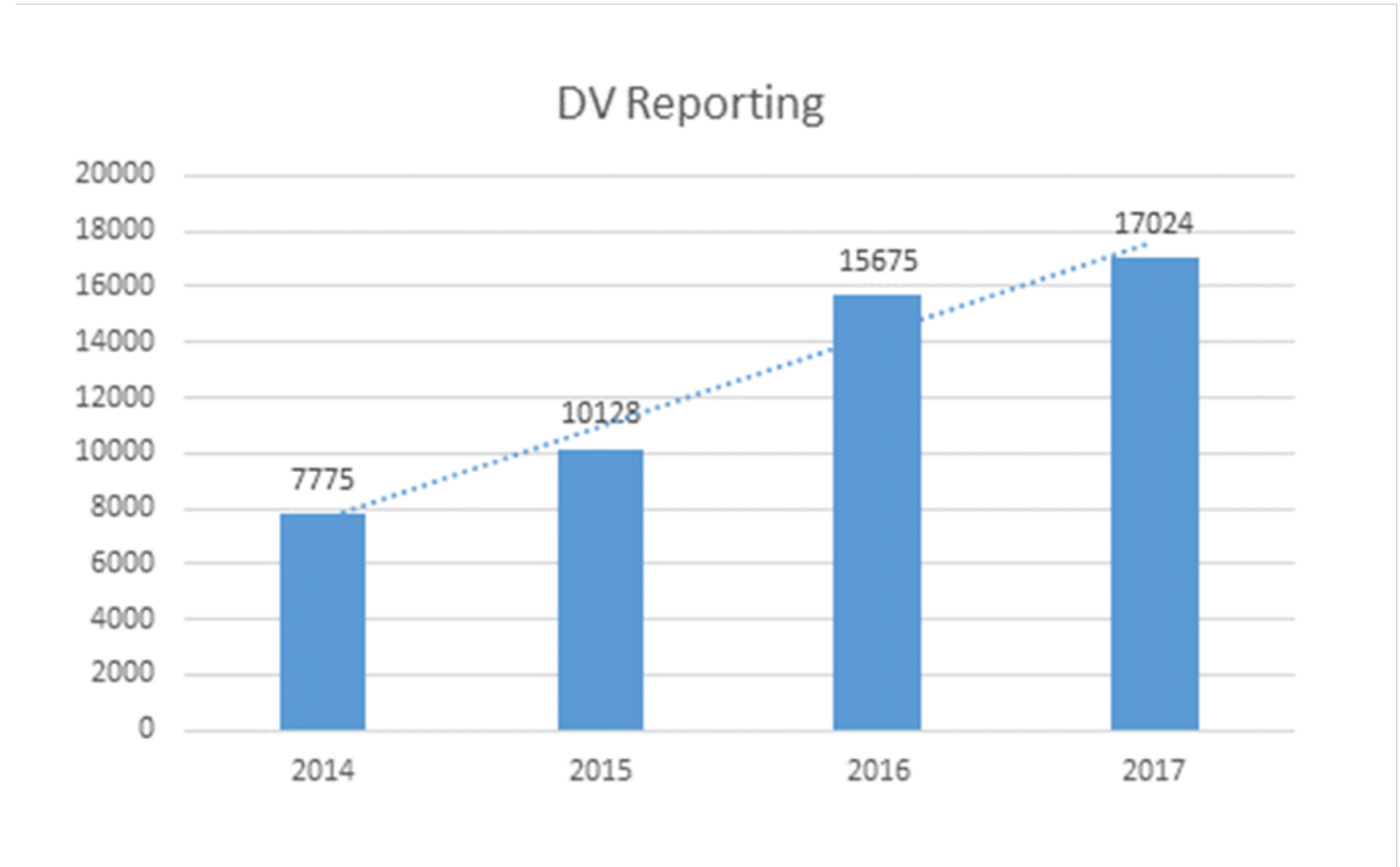
Illustrative Data

- OCDM Detective Audits: 100%
- OCDM Patrol Audits: 95%-100%
- Reported DV calls up to expected levels – indicates trust, proper reporting, and clearances by officers

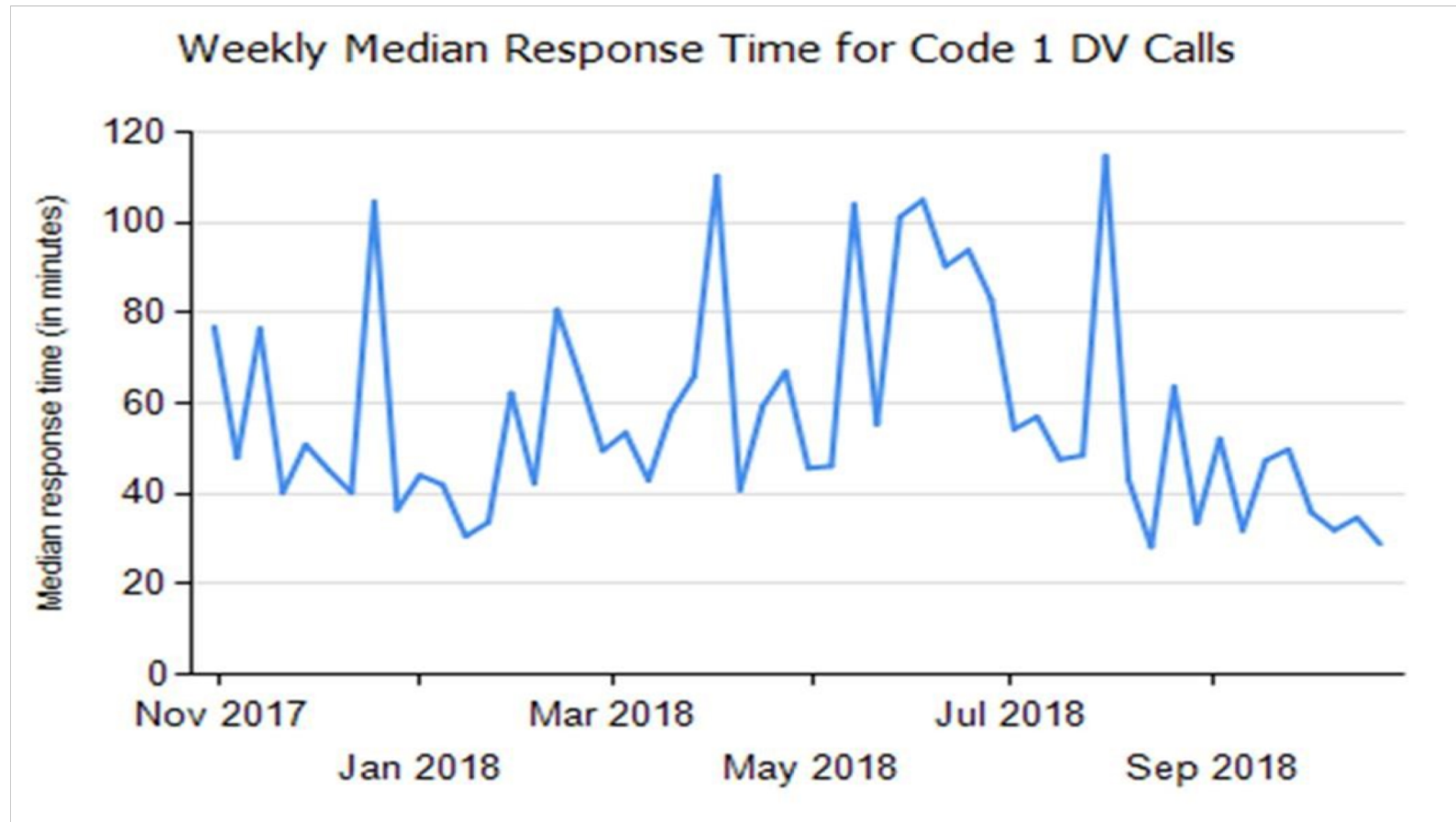
Ongoing NOPD Commitments

- Continue updating policies
- Continue updating training
- Conduct regular internal audits

Domestic
Violence
Reporting



Domestic Violence Code 1 Response Times



Officer Assistance and Support

- “NOPD agrees to provide officers and employees ready access to the mental health and support resources necessary to facilitate effective and constitutional policing. To achieve this outcome, NOPD agrees to implement the requirements below.”

Officer Assistance & Support

NOPD Reform Highlights

- Established Officer Assistance Program (OAP)
- Office staffed with licensed professionals
- Regular Academy training

OCDM Findings

- User feedback highly positive
- Training effective
- Services need further expansion

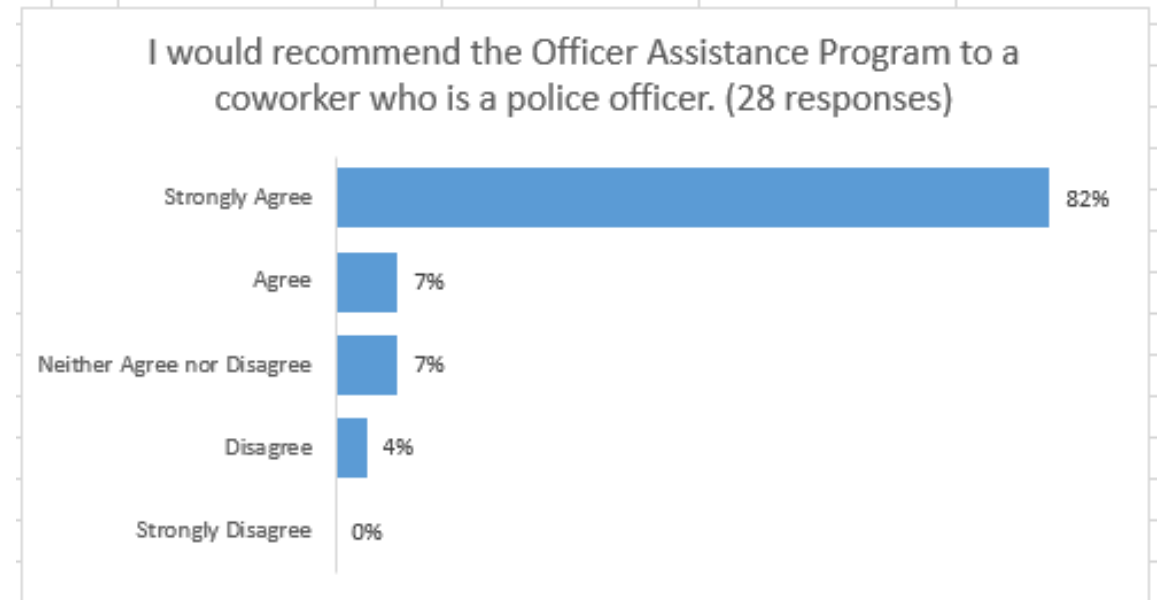
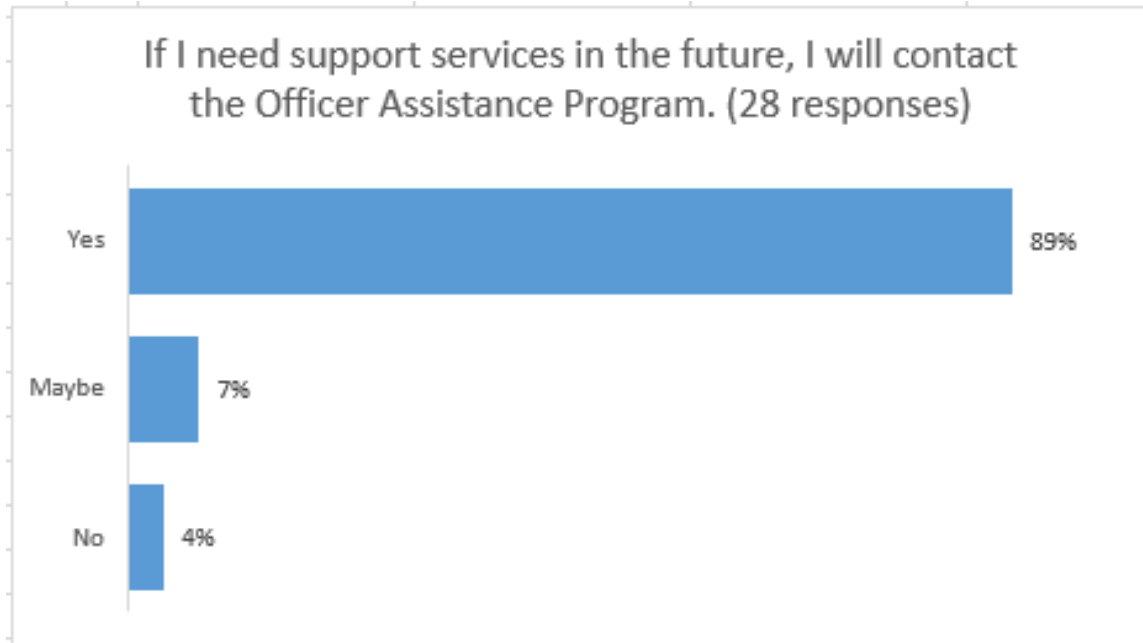
Illustrative Data

- Rewrote Standard Operating Procedures (SOP)
- OAP resources easily located on NOPD website
- OAP practices based on national best practice standards

Ongoing NOPD Commitments

- Maintain positive relations with officers and their families
- Identify additional resources needed
- Analyze data to determine sufficiency of personnel

Illustrative OAP Survey Results



Secondary Employment System

- “The City shall completely restructure what is currently known as its Paid Detail system to ensure that officers’ and other NOPD employees’ off-duty secondary employment does not compromise or interfere with the integrity and effectiveness of NOPD employees’ primary work as sworn police officers serving the entire New Orleans community. To achieve this outcome, the City shall develop and implement an off-duty secondary employment system that comports with applicable law and current professional standards, and which shall include the requirements set out below.”

Secondary Employment System

NOPD Reform Highlights

- New policies / training
- Effective Office of Police Secondary Employment (OPSE)
- Successful transition to new leader, Fabian Barbarin

OCDM Findings

- 100% compliant in almost all Secondary Employment CD paragraphs
- Accurate & complete data
- Violations handled appropriately
- Secondary employment system comports with applicable law and current professional standards

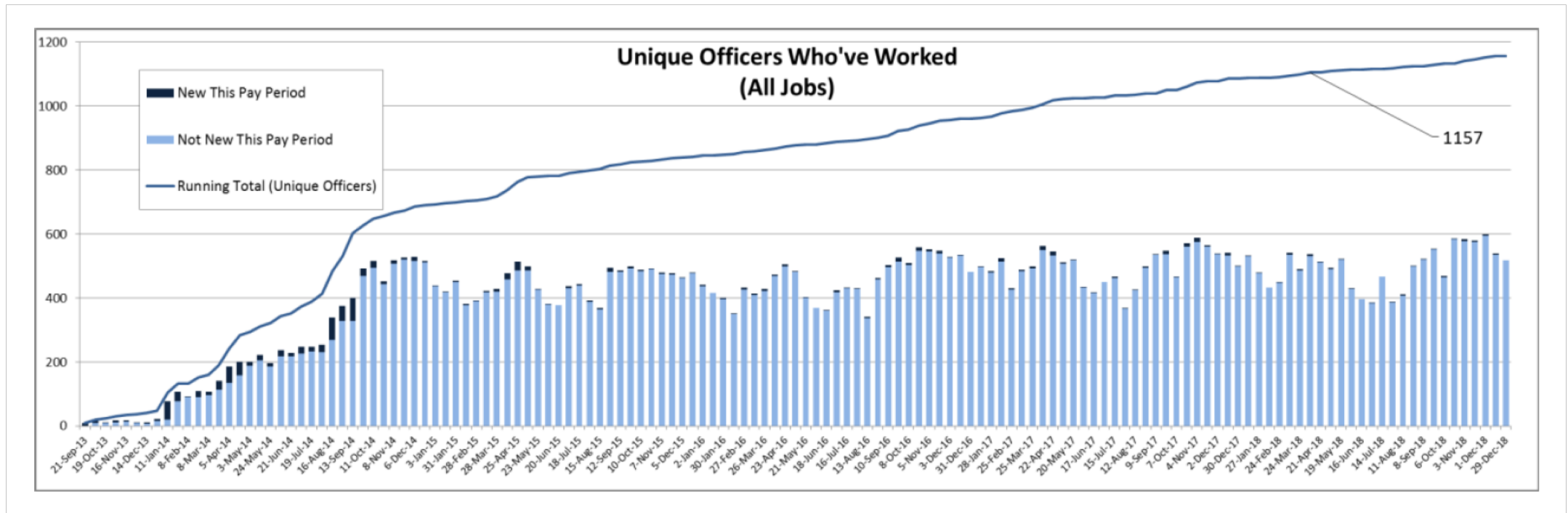
Illustrative Data

- Yearly increases in officer participation, hours worked, customers served, and gross revenues
- OPSE now manages all secondary employment by NOPD officers

Ongoing NOPD Commitments

- Continue robust OPSE
- Routine policy review/updates
- Maintain clear communication with NOPD officers

OPSE Has Expanded Opportunities For Officers



Secondary Employment Violations

2014	2015	2016	2017	2018
11	1	3	1	0

Misconduct Complaint Intake, Investigation, and Adjudication

- “NOPD and the City agree to ensure that all allegations of officer misconduct are received and are fully and fairly investigated; that all investigative findings are supported using the preponderance of the evidence standard and documented in writing; and that all officers who commit misconduct are held accountable pursuant to a disciplinary system that is fair and consistent. To achieve these outcomes, NOPD and the City agree to implement the requirements set out below.”

Misconduct Complaint Intake, Investigation, and Adjudication

NOPD Reform Highlights

- Misconduct routinely reported and discipline process is transparent
- Administrative Investigation timeframes comport with requirements
- Evidence is properly identified, collected, analyzed, and securely stored
- Investigative reports and documentation is securely stored

OCDM Findings

- Auditable data are readily available
- Complaint intake, classification, assignment and tracking complies with requirements
- Reports of misconduct are handled appropriately
- Misconduct investigations are thorough and objective

Illustrative Data

- Nearly 100% compliance demonstrated in multiple recent OCDM random sample audits
- Misconduct and UOF complaints are significantly down
- Placards describing the external complaint process are posted in every police district

Ongoing NOPD Commitments

- Maintain thoroughness of investigations
- Training requirements identified and being addressed but not yet completed
- Complaint information needs broad distribution and continuous availability
- Continue publishing detailed Annual Reports

Total NOPD Complaints

Complaint Type	2013	2014	2015	2016	2017
Public Initiated	669 (71%)	654 (75%)	549 (65%)	591 (69.5%)	470 (64%)
Rank Initiated	279 (29%)	215 (25%)	301 (35%)	259 (30.5%)	264 (36%)
TOTAL	948	869	850	850	734

Academy and In-Service Training

- “NOPD is committed to ensuring that all officers and employees receive adequate training to understand the law and NOPD policy and how to police effectively. NOPD training shall reflect and instill agency expectations that officers police diligently, have an understanding of and commitment to the constitutional rights of the individuals they encounter, and employ strategies to build community partnerships to more effectively increase public trust and safety. To achieve these outcomes, NOPD agrees to implement the requirements set out below.”

Academy and In-Service Training

NOPD Reform Highlights

- Updated all lesson plans
- Re-sequenced curriculum
- Created standards & policies
- Improved instructor training

OCDM Findings

- Engagement of Academy Administrator (PhD)
- Effective FTO program
- Quality Master Training Plan

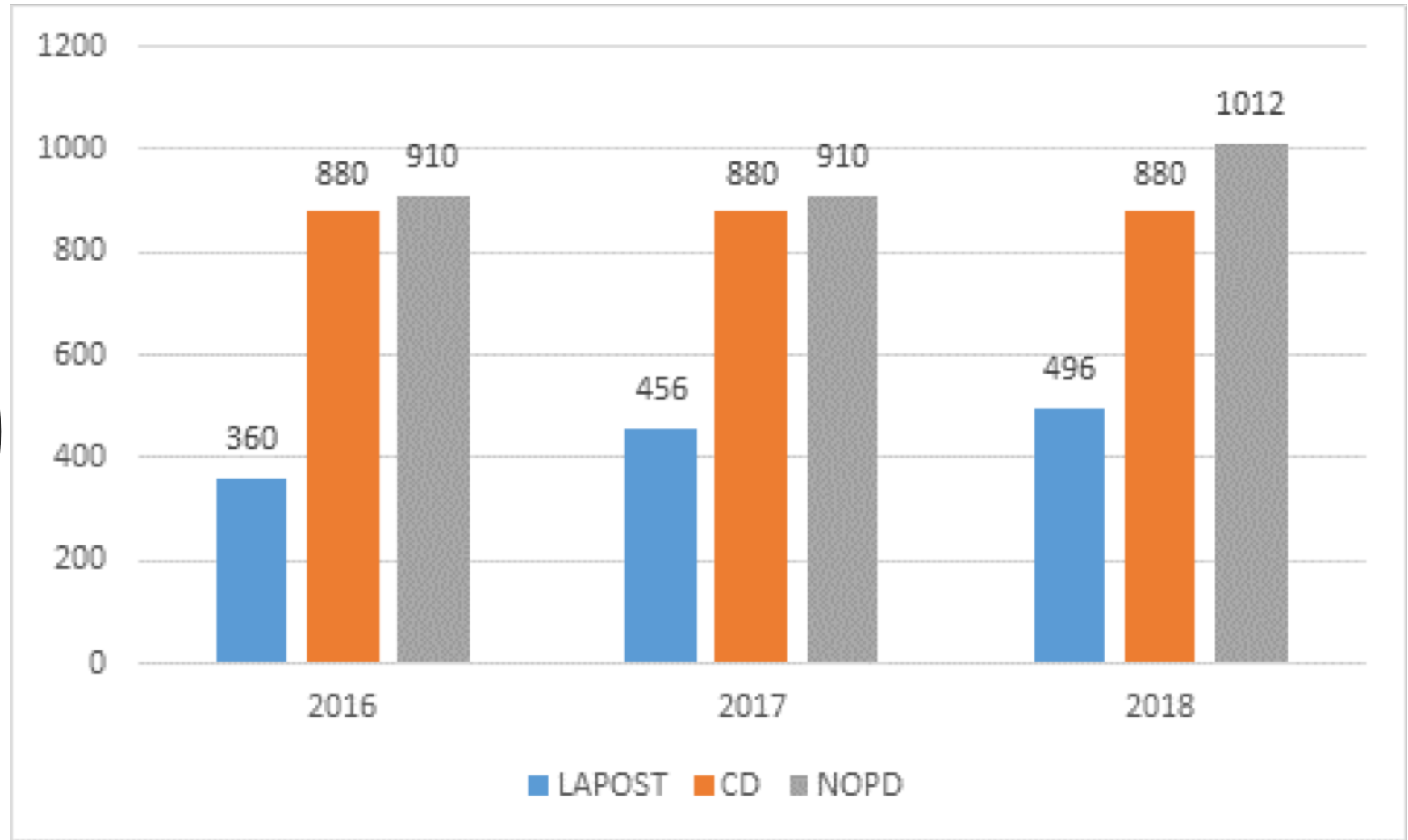
Illustrative Data

- 51% increase in training hours
- Nearly 100% of officers have received required training
- 98.7% of courses have acceptable content

Ongoing NOPD Commitments

- Continuous improvement of curriculum
- Continuous improvement of professional development program
- Implementation of new technology

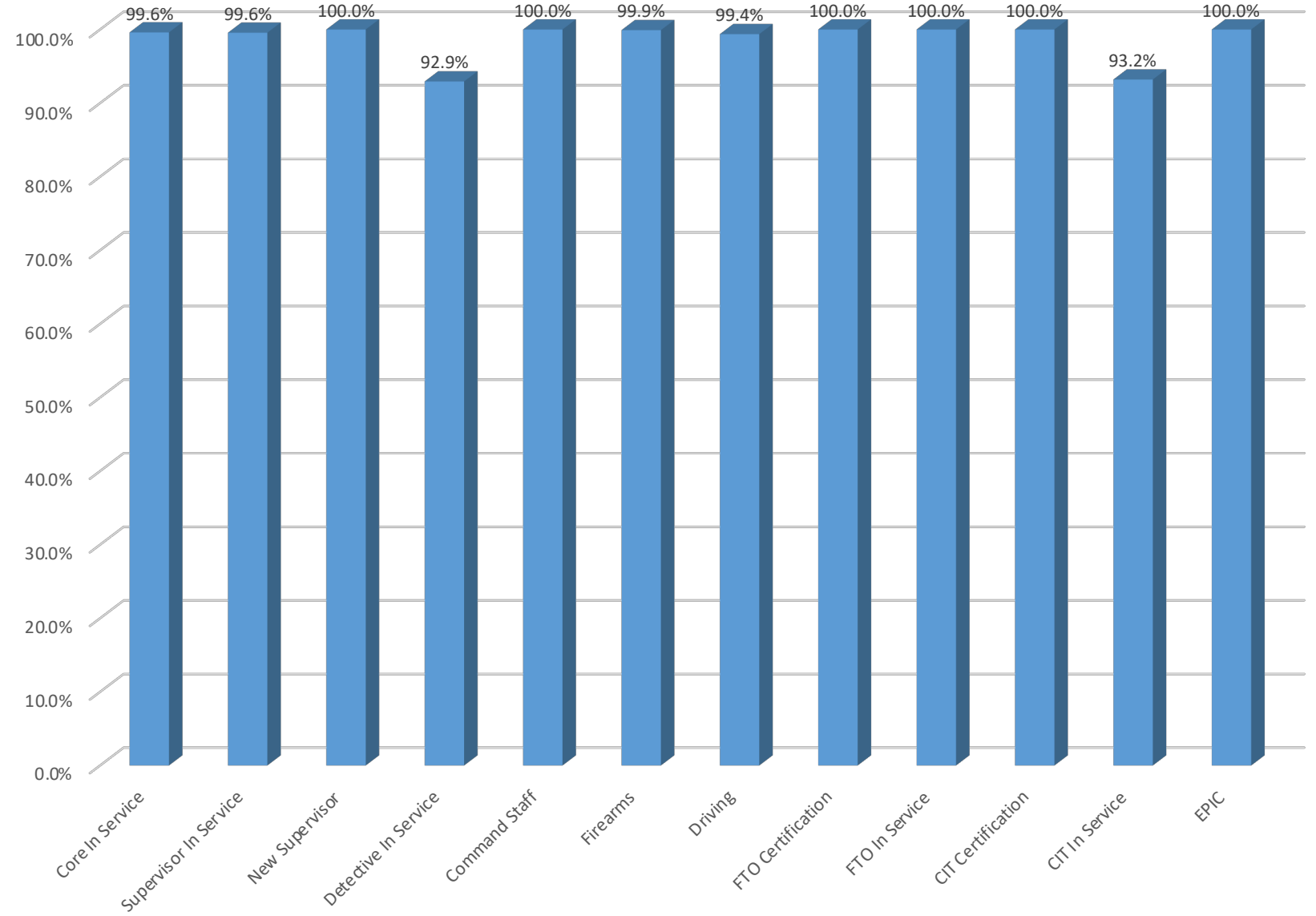
NOPD
Provides 104%
more training
hours than
required by LA
POST



Calendar of Academy Re-Sequenced Curriculum

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
7:45AM - 8:00AM ROLL CALL	7:45AM - 8:00AM ROLL CALL	7:45AM - 8:00AM ROLL CALL	7:45AM - 8:00AM ROLL CALL	7:45AM - 8:00AM ROLL CALL
8:00AM - 9:00AM INV-29 POST #06-106-R Burglary Investigation Instructor:	8:00AM - 9:00AM SP-4 POST #09-106-R Crisis Intervention-Behavioral Instructor:	8:00AM - 9:00AM SP-12 POST #09-106-R Crisis Intervention-Techniques Instructor:	8:00AM - 9:00AM UF-30 #14-103-R Verbal Communication-Tools Instructor:	8:00AM - 9:00AM INV-23:33; DV-2:5; LA-51:57; SP-4:17 Test T-8
9:00AM - 10:00AM INV-30 POST #06-106-R Burglary Investigation Instructor:	9:00AM - 10:00AM SP-5 POST #09-106-R Crisis Intervention-Behavioral Instructor:	9:00AM - 10:00AM SP-13 POST #09-106-R Crisis Intervention-Techniques Instructor:	9:00AM - 10:00AM UF-31 #14-103-R Verbal Communication-Tools Instructor:	9:00AM - 10:00AM INV-23:33; DV-2:5; LA-55:61 Test T-8
10:00AM - 11:00AM RW-45 03-118-R Burglary Report Exercise Instructor:	10:00AM - 11:00AM SP-6 POST #09-106-R Crisis Intervention-Behavioral Instructor:	10:00AM - 11:00AM SP-14 POST #09-106-R Crisis Intervention-Techniques Instructor:	10:00AM - 11:00AM UF-32 #14-103-R Verbal Communication-Tactical Instructor:	10:00AM - 11:00AM PA-50 POST #08-120-R Issuing Traffic Citations Instructor:
11:00AM - 12:00PM INV-31 POST #06-109-R Identity Theft Investigation Instructor:	11:00AM - 12:00PM SP-7 POST #09-106-R Crisis Intervention-Behavioral Instructor:	11:00AM - 12:00PM SP-15 POST #09-106-R Crisis Intervention-Procedures Instructor:	11:00AM - 12:00PM UF-33 #14-103-R Verbal Communication-Tactical Instructor:	11:00AM - 12:00PM PA-51 POST #08-120-R Issuing Traffic Citations Instructor:
12:00PM - 12:30PM LUNCH	12:00PM - 12:30PM LUNCH	12:00PM - 12:30PM LUNCH	12:00PM - 12:30PM LUNCH	12:00PM - 12:30PM LUNCH
12:30PM - 1:30PM INV-32 POST #06-109-R Identity Theft Investigation Instructor:	12:30PM - 1:30PM SP-8 POST #09-106-R Crisis Intervention-Procedures Instructor:	12:30PM - 1:30PM SP-16 POST #09-106-R Crisis Intervention-Procedures Instructor:	12:30PM - 1:30PM TS-1 POST #07-104-R Motor Vehicle Laws Instructor:	12:30PM - 1:30PM PA-52 POST #08-120-R Issuing Traffic Citations Instructor:
1:30PM - 2:30PM INV-33 POST #06-109-R Identity Theft Investigation Instructor:	1:30PM - 2:30PM SP-9 POST #09-106-R Crisis Intervention-Disorders Instructor:	1:30PM - 2:30PM SP-17 POST #09-106-R Crisis Intervention-Legal Instructor:	1:30PM - 2:30PM TS-2 POST #07-104-R Motor Vehicle Laws Instructor:	1:30PM - 2:30PM LA-58 POST #09-106-R Elements-Weapons Violations Instructor:
2:30PM - 3:15PM PT-56 POST #12-101-R Physical Fitness Training Instructor:	2:30PM - 3:15PM SP-10 POST #09-106-R Crisis Intervention-Disorders Instructor:	2:30PM - 3:15PM PT-58 POST #12-101-R Physical Fitness Training Instructor:	2:30PM - 3:15PM TS-3 POST #07-104-R Motor Vehicle Laws Instructor:	2:30PM - 3:15PM PT-60 POST #12-101-R Physical Fitness Training Instructor:
3:15PM - 3:45PM PT-57 POST #12-101-R Physical Fitness Training Instructor:	3:15PM - 3:45PM SP-11 POST #09-106-R Crisis Intervention-Techniques Instructor:	3:15PM - 3:45PM PT-59 POST #12-101-R Physical Fitness Training Instructor:	3:15PM - 3:45PM TS-4 POST #07-104-R Motor Vehicle Laws Instructor:	3:15PM - 3:45PM PT-61 POST #12-101-R Physical Fitness Training Instructor:
HOMEWORK: BURGLARY REPORT	3:45PM - 4:45PM STUDY HALL		3:45PM - 4:45PM STUDY HALL	

Nearly all officers have received the requisite training



OCDM Academy Course Evaluations

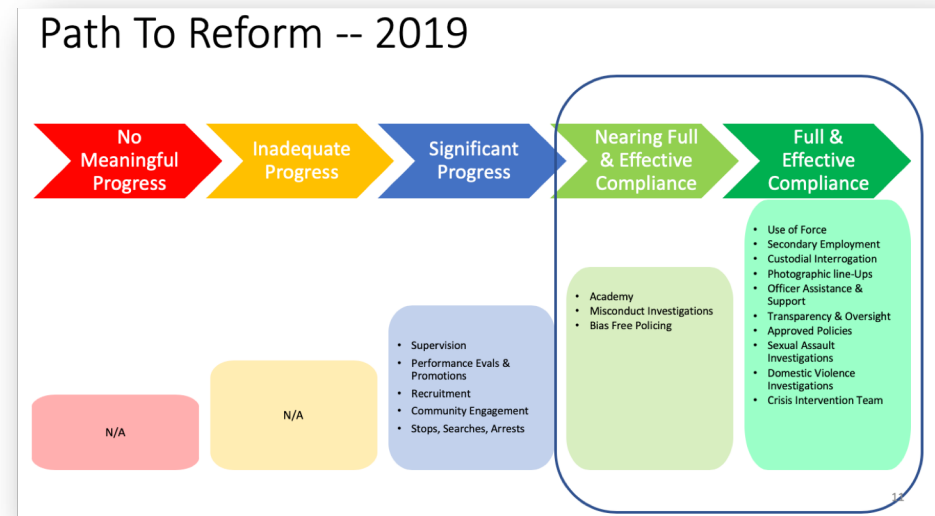
- The Monitoring Team has observed most instructors and most courses
- Content now meets Consent Decree and legal requirements
 - OCDM found 98% of the courses reviewed had acceptable content
- Courses and lesson plans are well developed
- Instructors now teach courses competently
- Academy now has a more robust professional development program
- Still room for improvement in terms of
 - Incorporating “core concepts” into every class
 - Employing adult learning techniques in every class

Areas of Significant Progress But Requiring Additional Effort

- Supervision
- Stops, Searches, Arrests
- Recruitment
- Performance Evaluations
- Community Engagement

Observations About The “Blue Box” Items

- “Significant progress” is not a negative finding, but it is an important finding
- Several of these items go to the very heart of the Consent Decree
- Achieving “Full and Effective Compliance” in these areas will take continued commitment on the part of the NOPD and the Monitoring Team



Areas Needing Additional Effort



Supervision

- Inconsistent review of force statements by supervisors
- Supervisors not consistently working same shifts as those they supervise
- Districts not consistently meeting patrol/supervisor ratio
- EWS still not used to full capacity
- Supervisors performing inadequate evaluations
- Rollcall training inconsistent
 - Inconsistent quality of supervision



Stop, Searches, Arrests

- Inconsistent documentation of searches (boilerplate language and inaccuracies)
 - Inconsistent supervisor reviews of search documentation
 - Consent searches not consistently approved by supervisors
- Training in need of further improvement



Recruitment

- Still not attracting adequate quantity and quality of recruits
- Quality of vetting process inconsistent
- Insufficient communication with recruitment partners
 - Insufficient internal communications
- Insufficient communications with applicants / recruits
 - Insufficient analysis of trends/best practices
- Processes often inefficient



Performance Evaluations / Promotions

- Supervisors not consistently preparing meaningful evaluations
 - Commanders not adequately supervising evaluation process
- Inconsistent attention to correcting deficiencies in evaluation process



Community Engagement

- Geographic Deployment Plan not implemented
- Community problem solving approach not fully implemented
- Community Policing Form and Scorecard not fully implemented
- Uneven quality of District meetings
- Room for improvement in using MAX meetings to implement community policing

From
Compliant
To
Professional

EPIC Peer Intervention Program

MAX Management Tool

Open Government Data Transparency

Critical Incident Video Release Policy

NOPD/Loyola Fellowship

NOPD/Innocence Project Partnership

“Academy 21~” Continuing Policing Education Program

Burden Reduction Working Group

Active Contributors To National Police Reform Conversation

A Recipe For Success



Contributors to Past Progress

Highly credible and proven NOPD leadership team

Dedicated and energetic Compliance Bureau

Professionalization of Academy

Effective partnership among NOPD, DOJ, and OCDM

Vigilant Monitoring Team

Significant OCDM technical assistance

Close judicial oversight



Keys To Continued Progress

Empower NOPD leadership to continue reform path

Implement additional tools to *sustain* reforms

Continue to devote sufficient resources

Continue building community trust

Expand Compliance Bureau self-audit capacity

Continue effective partnership among NOPD, DOJ, and OCDM

Close judicial oversight

Path Forward



Rely more heavily on internal NOPD audits in areas already in full and effective compliance



Finalize reviews/audits of areas nearing full and effective compliance



Continue robust audits and assessments of areas not yet in full and effective compliance



Continue reviewing ALL serious uses of force



Continue providing technical assistance where needed



Work with DOJ and NOPD to measure “outcome assessments”

Conclusion

