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CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL

REVIEW OF THE CHICAGO POLICE DEPARTMENT'S MANAGEMENT OF SCHOOL RESOURCE OFFICERS



REPORT OF THE PUBLIC SAFETY SECTION OF THE OFFICE OF INSPECTOR GENERAL



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TO THE MAYOR, THE CHAIR OF THE COMMITTEE ON PUBLIC SAFETY, THE CITY COUNCIL, THE CITY CLERK, THE CITY TREASURER, AND THE RESIDENTS OF THE CITY OF CHICAGO:

The Public Safety Section (PS) of the City of Chicago Office of Inspector General (OIG) has concluded a review of the Chicago Police Department's (CPD or the Department) management of School Resource Officers (SRO) assigned to Chicago Public Schools (CPS). OIG has concluded that CPD's recruitment, selection, placement, training, specification of roles and responsibilities, and evaluations of its SROs are not sufficient to ensure officers working in schools can successfully execute their specialized duties.

OIG reviewed CPD's recruitment, selection, placement, training, specification of roles and responsibilities, and evaluation of its SROs assigned to CPS. OIG determined that, since December 31, 2016, CPD has assigned officers to CPS without a current legal agreement between the two agencies. Neither CPD nor CPS is able to provide an up-to-date list of SROs and the school locations to which these officers are assigned. Rather, CPD provided a list last updated in March 2017, while CPS provided a list current through 2014.

CPD currently lacks Department directives to address SRO-specific recruitment, selection, placement, training, or evaluation. Moreover, CPD's current processes for recruiting, selecting, placing, training, specifying roles and responsibilities, and evaluating SROs do not reflect best practices—as none have been adopted by CPD. Yet best practice standards exist. For example, in 2017, the U.S. Department of Justice and U.S. Department of Education released a set of resources entitled the [SECURE Local Implementation Rubric and SECURE State and Local Policy Rubrics](#)—to help both local education agencies and law enforcement agencies develop SRO programs that foster school safety without violating students' civil rights or unnecessarily involving students in the criminal justice system. CPD's current lack of guidance and structure for SROs amplifies community concerns and underscores the high probability that students are unnecessarily becoming involved in the criminal justice system, despite the availability of alternate solutions.

For the benefit of CPS students, their families, and the Chicago community at large, within this report, OIG provides CPD with recommendations for the Department to establish an SRO program aligned with national best practices. To that end, OIG recommends that CPD,

- draft and implement a Memorandum of Understanding (MOU) in collaboration with CPS and community stakeholders that, amongst other areas, states:

- the purpose of the SRO partnership;
- outlines the roles and responsibilities of CPD, CPS, and principals in schools; and
- emphasizes that SROs should not be involved in routine student disciplinary matters;
- collaborate with CPS, students, families and the community to establish hiring guidelines for SROs;
- establish and require initial and ongoing training for officers assigned as SROs;
- establish performance evaluations aligned with established SRO roles and training that measures the ability of SROs to de-escalate situations and use alternatives to student arrest;
- designate a program coordinator to enhance coordination and accountability; and
- maintain and regularly update rosters of officers assigned to CPS.

Due to the high level of significance this issue holds within the community and in order to bring much sought-after clarity and resolution to this topic, OIG requested a prompt response from CPD detailing: (1) the Department’s response to the findings; and (2) its intended actions to remedy this current state of affairs. OIG encouraged CPD and CPS to resolve these issues prior to the start of the 2018-2019 school year, so that CPS students could benefit from a functional SRO program rooted in national best practices as soon as possible. CPD, in turn, requested a 30-day extension for its response to this report. As a result, OIG received CPD’s response on September 4, 2018 —the first day of school for the current school year.¹

In their response, CPD concurred with many of the findings and recommendations detailed in the report. CPD’s response indicated that the Department will:

- Undertake best efforts to enter into an MOU with CPS that clearly delineates authority and specifies procedures for CPD officer interaction with students while on school grounds;
- Develop a policy that defines roles, responsibilities, and appropriate actions of SROs, which will include an express prohibition on the administration of school discipline by CPD officers and provisions for the collection, analysis, and use of data regarding CPD activities in schools;
- Develop and implement screening criteria to ensure SROs have the qualifications, skills, and abilities necessary to work safely and effectively with students, parents/guardians, and school personnel; and

¹ See Appendix F.

- Ensure that all SROs receive initial specialized training and annual refresher trainings, and encourage SROs to exercise discretion to use alternatives to arrest and referral to juvenile court.

OIG acknowledges CPD's expressed commitment to making these necessary reforms. However, the reforms proposed by CPD in their response did not address other crucial areas of concern outlined in the report. Specifically, CPD did not acknowledge or respond to the following recommendations outlined in the report:

- To include a broad range of community stakeholders in the creation of the MOU;
- To create hiring guidelines and include a broad range of community stakeholders in the process;
- To state the purpose of the SRO partnership with CPS in the MOU;
- To define the data and information that will be shared between CPD and CPS;
- To establish performance evaluations for SROs; and
- To maintain and regularly update rosters of SROs.

Last, CPD indicated that their proposed changes will be implemented as part of the consent decree before the start of the 2019-2020 school year. CPD's failure to act more expeditiously to implement the reforms prior to the next school year leaves students, teachers, parents, and community stakeholders in the current school year without the protections and assurances of a school safety program that is aligned with national best practices.

We thank CPD management and staff, especially the Bureau of Patrol, along with CPS personnel for their cooperation with this review.

Respectfully,



Joseph Lipari
Deputy Inspector General, Public Safety
City of Chicago

cc: Charise Valente, General Counsel, CPD
Dana M. O'Malley Assistant General Counsel, CPD
Robert Boik, Chief of Staff, CPD
Edward Siskel, Corporation Counsel, City of Chicago Law Department

I. INTRODUCTION

The Public Safety Section (PS) of the City of Chicago Office of Inspector General (OIG) has concluded a review of the Chicago Police Department's (CPD) management of School Resource Officers (SRO). OIG found that CPD currently assigns SROs to Chicago Public Schools (CPS) absent any identifiable program or programmatic support at the Department level. Since December 31, 2016, CPD has assigned SROs to CPS without a current legal agreement between the two agencies. Moreover, CPD currently has no General or Special Orders, or policies or procedures that guide recruitment, selection, placement, training, roles and responsibilities, or performance evaluation for CPD officers that are assigned as SROs.² CPD's current processes for recruiting, selecting, placing, training, determining roles and responsibilities, and evaluating the performance of SROs do not reflect national best practices. OIG's examination also revealed that the level of collaboration necessary to achieve national best practices and goals does not currently exist between CPD and CPS. As a result, CPD cannot presently ensure that the officers working in CPS have either the programmatic support and/or the skills necessary to successfully execute their specialized duties. OIG therefore recommends that CPD, in collaboration with CPS, develop and implement a Memorandum of Understanding (MOU) that establishes a comprehensive SRO program that includes guidelines for SROs' recruitment, selection, placement, training, roles and responsibilities, and evaluation.

II. BACKGROUND

Across the country, sworn local law enforcement personnel are assigned to public school districts as SROs to help ensure school safety and security. Nationally, SRO programs generally are established as "collaborative efforts by police agencies, law enforcement officers, educators, students, parents, and communities" with the ultimate goal of "provid[ing] safe learning environments . . . foster[ing] positive relationship with our nation's youth, and develop[ing] strategies to resolve problems affecting our youth with the objective of protecting every child so they can reach their fullest potential."³ As a result, law enforcement officers assigned to work in public schools may be expected to fill a number of roles.⁴ According to the National Association of School Resource Officers, an SRO serves as an "educator, informal counselor, and law

² See Appendices A and C. The Department does have a General Order regarding investigations in schools that provides guidance for Department members interviewing, interrogating, or taking students into custody. However, it does not address SRO recruitment, selection, placement, training, roles and responsibilities, or evaluation. City of Chicago, "General Order G04-01-02: Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d8eab6458bcad279.pdf?hl=true>.

³ *To Protect and Educate: The School Resource Officer and the Prevention of Violence in Schools* (National Association of School Resource Officers, 2012), 3, accessed July 13, 2018, <https://nasro.org/cms/wp-content/uploads/2013/11/NASRO-To-Protect-and-Educate-nosecurity.pdf>.

⁴ *To Protect and Educate: The School Resource Officer and the Prevention of Violence in Schools* (National Association of School Resource Officers, 2012), 3, accessed July 13, 2018, <https://nasro.org/cms/wp-content/uploads/2013/11/NASRO-To-Protect-and-Educate-nosecurity.pdf>.

enforcer.”⁵ The Department of Justice (DOJ) and the Department of Education (ED) suggest that school districts, local law enforcement agencies, students, families, and community advocates work collaboratively to determine the specific role and responsibilities of SROs in their schools.⁶

A. NATIONAL BEST PRACTICES FOR SCHOOL RESOURCE OFFICER PROGRAMS

To assist schools interested in developing and maintaining “appropriate” and “effective” SRO programs, DOJ and ED released the 2017 *SECURE Local Implementation Rubric and SECURE State and Local Policy Rubric* (The National Rubrics).⁷ According to ED, when school districts and police departments work in partnership to develop programs using these guidelines, SROs are better prepared to foster school safety without violating students’ civil rights or unnecessarily involving students in the criminal justice system.⁸ The National Rubrics counsel that such school district/police department partnerships,

- be grounded in an intergovernmental MOU that, among other things, outlines SROs’ roles and responsibilities, while explicitly stating that SROs should never intervene in routine student disciplinary matters⁹;
- involve collaboration with community stakeholders on hiring guidelines that focus on officers’ qualifications for working with young people in a school environment¹⁰;
- establish policies for school-specific training for officers before they begin working as SROs and that they have regular refresher trainings¹¹;

⁵ *To Protect and Educate: The School Resource Officer and the Prevention of Violence in Schools* (National Association of School Resource Officers, 2012), 3, accessed July 13, 2018, <https://nasro.org/cms/wp-content/uploads/2013/11/NASRO-To-Protect-and-Educate-nosecurity.pdf>.

⁶ Secretary John B. King, *Dear Colleague* (U.S. Department of Education, September 8, 2016), 2, accessed July 13, 2018, <https://www2.ed.gov/policy/gen/guid/school-discipline/files/ed-letter-on-sros-in-schools-sept-8-2016.pdf>.

⁷ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice, September 8, 2016), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>

and *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric* (U.S. Department of Education and U.S. Department of Justice, September 8, 2016), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>.

⁸ Secretary John B. King, *Dear Colleague* (U.S. Department of Education, September 8, 2016) 2, accessed July 13, 2018, <https://www2.ed.gov/policy/gen/guid/school-discipline/files/ed-letter-on-sros-in-schools-sept-8-2016.pdf>.

⁹ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

¹⁰ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

¹¹ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric* (U.S. Department of

- continually evaluate SROs in a manner that incorporates feedback from school staff, school administrators, students, and families¹²; and
- develop performance measures to track SROs' effective use of alternatives to citations, tickets, and arrests.¹³

B. CPD OFFICERS IN CHICAGO PUBLIC SCHOOLS

CPD has been assigning sworn officers as SROs in select CPS schools for decades. Until 2006, CPD's SRO program was managed through a dedicated, Department-level School Patrol Unit. In 2006, CPD disbanded the School Patrol Unit, delegating responsibility for SROs to each district from which SROs are assigned to individual schools.¹⁴ According to CPD, this allows school sergeants and district commanders to more effectively supervise the SROs in their districts and to better address each school's unique needs. According to CPS, 74 schools¹⁵ had officers assigned as SROs during the 2017-2018 school year. Those 74 schools with assigned SROs are encompassed within 21 of the 22 police districts (all but Police District 14).

Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>.

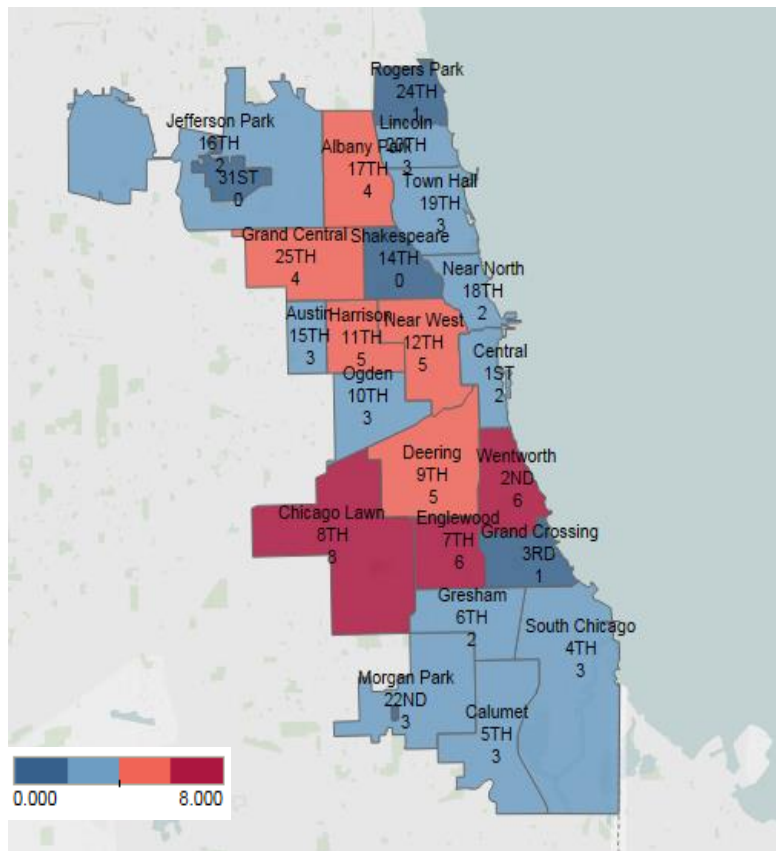
¹² *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

¹³ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

¹⁴ Yana Kunichoff, "Police in Chicago Public Schools Operate with No Special Training and Little Oversight," Chicago Reader, February 1, 2017, accessed July 13, 2018, <https://www.chicagoreader.com/chicago/police-public-schools-cpd-cps-misconduct-training/Content?oid=25347810>.

¹⁵ See Appendix D for the complete list of 74 schools provided by CPS.

FIGURE 1: School resource officer placement by police district



CPD identified SROs' primary responsibilities as: ensuring the safety of students in schools; preventing interruptions to the school day; maintaining order; and preventing trespassing on school property. Over time, CPS has narrowed the number of situations in which school staff should involve SROs or other CPD officers. According to the CPS Student Code of Conduct, school administrators should contact CPD only in the event of criminal activity or an emergency.¹⁶ The Student Code of Conduct outlines what definitely constitutes criminal conduct and what may constitute criminal conduct.¹⁷ It also includes a list of factors school staff and administrators should consider before involving CPD in any student matter.¹⁸ Those factors include the student's age, whether the student's actions resulted in physical injury or endangered others, the seriousness of the criminal violation, and the harm caused by the

¹⁶ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 11-13, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

¹⁷ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 11-13, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

¹⁸ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 11-13, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

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

According to CPS, teachers should never directly contact the school's SRO to intervene in a non-criminal matter. Instead, teachers should refer issues with students to school principals or administrators. Even in emergencies, teachers should call 911 rather than the school's SRO. In interviews with OIG, CPD stated that they try to respect CPS' request to use methods other than arresting students. However, according to CPD, once SROs become involved, they may have no choice but to arrest students depending on the circumstances of the incident.

¹⁹ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 12, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

²⁰ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 11, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

III. CPD DOES NOT HAVE A CURRENT INTERGOVERNMENTAL AGREEMENT WITH CPS THAT GOVERNS THE RECRUITMENT, SELECTION, PLACEMENT, TRAINING, ROLES AND RESPONSIBILITIES, AND EVALUATION OF SROS

A. THE SRO PROGRAM HAS OPERATED WITHOUT A CPD-CPS INTERGOVERNMENTAL AGREEMENT SINCE JANUARY 1, 2017

According to DOJ and ED, a detailed MOU is essential to building and maintaining “appropriate” and “responsible” partnerships between schools and law enforcement agencies.²¹ At a minimum, the terms of the MOU should:

“ . . . Meet constitutional and statutory and civil rights requirements including Federal, State, and local prohibitions on discrimination on the basis of race, color, national origin, language status, religion, sex, sexual orientation, and disability; on the use of excessive force; and on improper searches, seizures, or interrogations.”²²

However, CPD and CPS have no current MOU or legal agreement that would meet this national best practice and standard. CPS and CPD’s most recent agreement, which was a renewal of their initial Intergovernmental Agreement (IGA) from 2013, expired on December 31, 2016.²³ OIG spoke with both CPD and CPS on separate occasions, at which time representatives from both agencies confirmed that the only document that exists is the expired legal agreement from 2016. For more than an entire school year, CPS and CPD have operated without a current formal agreement that defines the roles and expectations of SROs functioning in schools.

Even while in effect, the since-expired IGA provided limited guidance relating to SRO recruitment, selection, placement, training, roles and responsibilities, and performance evaluations. For example, the only qualifications for becoming an SRO under the expired IGA included a working knowledge of CPS’ Student Code of Conduct and completing standard police

²¹ According to the *SECURE State and Local Policy Rubric*, appropriate and responsible partnerships have “the goal of preventing unnecessary or inappropriate arrests, referrals to law enforcement, contact with the juvenile justice system, and violations of civil rights laws.” *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>.

²² *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

²³ City of Chicago, “Authorize the First Renewal of Intergovernmental Agreement with Chicago Police Department for School Patrol Services,” December 16, 2015, accessed July 13, 2018, https://www.cpsboe.org/content/actions/2015_12/15-1216-PR8.pdf.

officer training.²⁴ The IGA did not address how a prospective SRO's working knowledge of the CPS Student Code of Conduct would be confirmed or when and how SROs should respond to violations of the Student Code of Conduct. The IGA also did not require any specialized training on working with youth in an educational setting.²⁵

In interviews with OIG, CPS stated that it is currently working with CPD, student groups, and advocacy groups to draft an MOU. According to CPS, the MOU will provide a detailed description of SRO roles and responsibilities, include guidelines for referring students to counselors, and outline protocols for taking students out of schools. CPS needs the Chicago Teachers Union and Fraternal Order of Police to approve the MOU before it can be implemented. CPS could not provide OIG with specific dates as to when a new MOU would be completed, considered effective, or implemented, but stated that it aims to put one into operation by the start of the new school year. CPD made no mention of this MOU or of working with CPS on its production.

B. CPD LACKS FORMAL SRO RECRUITMENT, SELECTION, AND PLACEMENT PROCESSES AND STANDARDS

In order to select officers for SRO positions, school districts and law enforcement agencies should collaborate on quality recruiting and hiring processes. The *SECURE Local Implementation Rubric* recommends that school districts and law enforcement agencies work together to create hiring guidelines that focus on officers' qualifications for working with young people in a school environment.²⁶ A wide range of stakeholders including school staff, students, parents, families, community members, and youth development experts should then interview qualified candidates.²⁷

CPD does not currently have any formal recruitment, selection, or placement processes for SRO positions. Instead, school sergeants and district commanders individually assign officers to SRO positions based on their assessments of each officer's temperament and skill set. Individual district commanders may decide to interview officers for SRO positions, but the Department does not require that candidates participate in an interview process for the positions.

²⁴ City of Chicago, "Intergovernmental Agreement Between the City of Chicago and the Board of Education of the City of Chicago," accessed July 13, 2018, http://www.csc.cps.k12.il.us/purchasing/pdfs/contracts/2013_01/13-0123-PR12-1.pdf.

²⁵ City of Chicago, "Intergovernmental Agreement Between the City of Chicago and the Board of Education of the City of Chicago," accessed July 13, 2018, http://www.csc.cps.k12.il.us/purchasing/pdfs/contracts/2013_01/13-0123-PR12-1.pdf.

²⁶ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

²⁷ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

C. TRAINING

In order to prepare officers to work with students in schools, the National Rubrics recommend that law enforcement agencies and school districts establish policies requiring school-specific training for officers before they begin working as SROs, as well as regular refresher trainings.²⁸

These trainings should emphasize alternatives to arresting students, as well as cover relevant topics such as:

- Constitutional and civil rights;
- Childhood and adolescent development;
- Age-appropriate response to student conduct;
- Disability and special education issues;
- Conflict resolution and de-escalation techniques;
- Bias-free policing;
- Responses to trauma;
- Restorative justice techniques; and
- Interacting with specific student groups such as those with limited English proficiency, or who are lesbian, gay, bisexual, or transgender (LGBT).²⁹

CPD stated that most SROs receive active shooter training and crisis intervention training. In the past, CPD's Juvenile Intervention and Support Center has provided sexual assault training for SROs. CPD stated that it would be open to providing more training for SROs in alignment with best practices.

CPS last conducted training for all SROs on its revised Student Code of Conduct in 2013 (Appendix B). The Student Code of Conduct outlines inappropriate student behavior, disciplinary responses, and CPS' anti-bullying policy.³⁰ While it defines the rights and responsibilities of

²⁸ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>.

²⁹ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf> and *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE State and Local Policy Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-policy.pdf>.

³⁰ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 2-5, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

students, parents or guardians, school staff, and the chief executive officer, it does not provide any specific guidance for SROs or address their roles and responsibilities.³¹

D. NO FORMAL WRITTEN GUIDANCE EXISTS SPECIFYING THE ROLES AND RESPONSIBILITIES OF SROs

Neither CPD nor CPS has written roles or responsibilities for SROs. According to DOJ recommendations, MOUs should outline SROs' roles and responsibilities, while explicitly stating that SROs should never intervene in routine student disciplinary matters.³² SROs' responsibilities might include,

- handling calls for service in and around schools;
- conducting comprehensive safety and security assessments;
- developing emergency management and incident response systems based on the national Incident Management System and the four phases of emergency management: mitigation/prevention, preparedness, response, and recovery;
- developing and implementing safety plans or strategies;
- integrating appropriate security equipment/technology solutions;
- responding to unauthorized persons on school property;
- serving as liaisons between the school and other police agencies, investigative units, or juvenile justice authorities when necessary and consistent with applicable civil rights laws and privacy laws;
- serving as a member of a multidisciplinary school team to refer students to professional services within both the school (guidance counselors or social workers) and the community (youth and family service organizations);
- developing and expanding crime prevention efforts for students; and
- developing and expanding community justice initiatives for students.³³

When asked for Department policies or procedures specific to SROs, CPD directed OIG to a General Order, last updated in 1988, governing officers' investigations and investigative work products in CPS schools (Appendix A).³⁴ This General Order only outlines the protocol for any

³¹ *Student Code of Conduct* (Chicago Public Schools, September 5, 2017), 2-5, accessed July 13, 2018, http://cps.edu/SiteCollectionDocuments/SCC_StudentCodeConduct_English.pdf.

³² *Memorandum of Understanding Fact Sheet* (U.S. Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, https://cops.usdoj.gov/pdf/2017AwardDocs/chp/MOU_Fact_Sheet.pdf.

³³ *Memorandum of Understanding Fact Sheet* (U.S. Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, https://cops.usdoj.gov/pdf/2017AwardDocs/chp/MOU_Fact_Sheet.pdf.

³⁴ City of Chicago, Chicago Police Department, "General Order G04-01-02: Investigations-Chicago Public Schools," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d8eab6458bcad279.pdf?hl=true>.

Department member interviewing, interrogating, or taking students into custody on or around school property.³⁵ It provides no guidance specific to SROs or their responsibilities.³⁶ Other than this directive, the Department stated that it only has informal policies and procedures that district commanders communicate to school sergeants through individual conversations and/or email communications.

E. THERE ARE PRESENTLY INSUFFICIENT CONTROLS, GUIDANCE, AND STANDARDS NECESSARY FOR EFFECTIVE PERFORMANCE EVALUATIONS OF SROs

DOJ and ED recommend that schools, school districts, and law enforcement agencies “. . . continually evaluate SROs and school personnel, and recognize good performance.”³⁷ These evaluations should incorporate feedback from school staff, school administrators, students, and families.³⁸ DOJ and ED also recommend developing performance measures to track SROs’ effective use of alternatives to citations, tickets, and arrests.³⁹

According to CPD, an SRO’s job performance is evaluated in the same way as all other Department members, leaving the possibility that the evaluation may not necessarily capture their unique roles and functions as SROs. CPD provided OIG with a directive governing Department members’ performance evaluations (Appendix C).⁴⁰ This directive lists five “performance dimensions” used to evaluate all Department members’ performance:

- Accountability/Dependability⁴¹

³⁵ City of Chicago, Chicago Police Department, “General Order G04-01-02: Investigations-Chicago Public Schools,” accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d8eab6458bcad279.pdf?hl=true>.

³⁶ City of Chicago, Chicago Police Department, “General Order G04-01-02: Investigations-Chicago Public Schools,” accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a57b9b-15f92c9d-af615-f92c-d8eab6458bcad279.pdf?hl=true>.

³⁷ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

³⁸ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

³⁹ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

⁴⁰ City of Chicago, Chicago Police Department, “Employee Resource E05-01: Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent,” accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-c3dce7cd73e28d57.pdf?hl=true>.

⁴¹ City of Chicago, Chicago Police Department, “Employee Resource E05-01: Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent,” accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-c3dce7cd73e28d57.pdf?hl=true>.

- Problem Solving/Decision Making⁴²
- Adaptability/Responsiveness⁴³
- Communication⁴⁴
- Job Knowledge/Professional Development⁴⁵

None of these dimensions establish Department-wide performance measures specific to SROs' roles, such as the use of alternatives to arresting students. Furthermore, SROs cannot be adequately evaluated on their Job Knowledge and Professional Development without policies, procedures, and training specific to their roles.

CPS stated that it does not conduct evaluations of SROs' job performance, but that principals may provide feedback about their school SRO to school sergeants and district commanders. Neither CPS nor the Board of Education evaluates SROs or their performance.

⁴² City of Chicago, Chicago Police Department, "Employee Resource E05-01: Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-c3dce7cd73e28d57.pdf?hl=true>.

⁴³ City of Chicago, Chicago Police Department, "Employee Resource E05-01: Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-c3dce7cd73e28d57.pdf?hl=true>.

⁴⁴ City of Chicago, Chicago Police Department, "Employee Resource E05-01: Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-c3dce7cd73e28d57.pdf?hl=true>.

⁴⁵ City of Chicago, Chicago Police Department, "Employee Resource E05-01: Performance Evaluations for all Sworn Department Members Below the Rank of Superintendent," accessed July 13, 2018, <http://directives.chicagopolice.org/directives/data/a7a56e3d-12887ea9-ce512-887e-c3dce7cd73e28d57.pdf?hl=true>.

IV. CPD DOES NOT MAINTAIN CURRENT ROSTERS OF OFFICERS WORKING AS SROs AND THE SCHOOLS TO WHICH THEY ARE ASSIGNED

In order to establish the number of officers currently assigned as SROs, OIG requested a roster of officers serving as SROs as of May 1, 2018 from CPD. According to CPD, the Bureau of Patrol maintains and updates this roster. In response, CPD provided OIG with a roster dated March 21, 2017, that included officers' names, whether they were assigned to cars or schools, which schools they were assigned to, whether the officers had received crisis intervention training, and the name of their supervising school sergeant.

In an effort to cross reference the list acquired from CPD, OIG also requested a roster of CPD officers currently serving as SROs from CPS. CPS stated that CPD officers currently serve as SROs at 75 schools, and directed OIG to CPD for the list of those officers.

OIG's Center for Technological Analysis (CITA) also attempted to verify the accuracy and completeness of the roster provided by CPD by comparing it to CPD's administrative data housed within OIG and discovered a number of inconsistencies between the two sources which could not be reconciled. For example, according to CPD's administrative records of officer assignments, not all of the officers listed on the roster had a school-related posting as of March 21, 2017.⁴⁶ Of the 164 officers on the roster, 15 did not have a school-related posting; these included 3 officers listed as beat relief officers, 1 listed as a desk officer, and 1 listed as a tactical team officer. Of the 21 sergeants on the roster, 9 did not have a school-related posting as of March 21, 2017, and 1 had not held a school-related posting since June 10, 2015. Due to these inaccuracies, OIG determined that the roster could not be used for a point-of-time count of SROs or school sergeants.

In order to provide students, families, and community members with basic information about the number of CPD officers currently serving as SROs, CITA used CPD and City of Chicago administrative data to try and determine the number of CPD officers assigned to CPS schools as of May 16, 2018.

OIG found that as of May 16, 2018, 220 sworn CPD officers held school-related postings. More specifically, 132 officers were posted at schools, 75 officers were posted to school cars or mobile school cars, and 13 sergeants were posted as school sergeants.⁴⁷ However, CPD's administrative data also includes a number of internal inconsistencies between officers' postings compared to their assignments and details. While SROs and school sergeants are assigned to schools in their districts, only 197 of these 220 officers with school-related postings were assigned to a CPD district. For example, 10 officers were assigned or detailed to the Education and Training Division

⁴⁶ An officer's posting specifically indicates an individual officer's duties.

⁴⁷ SROs assigned to school cars are dedicated to a particular school, while SROs assigned to mobile schools cars patrol multiple schools. According to CPD, school sergeants supervise the SROs assigned to schools in their districts.

and 5 were assigned or detailed to the Human Resource Division. One SRO was assigned or detailed to the Marine Operations Unit. OIG could not resolve these inconsistencies. The following figures contain officer demographics of age, race, and gender. The administrative data was extracted from the CPD database and the Chicago Integrated Personnel and Payroll Systems (CHIPPS). The CPD database provided current SRO officer assignments, and CHIPPS provided officer information including race, age, and gender. Due to the inconsistencies between CPD’s records of officers’ postings and assignments or details, OIG cannot confirm the accuracy of these summary statistics.

FIGURE 2: CPD officer demographics by age

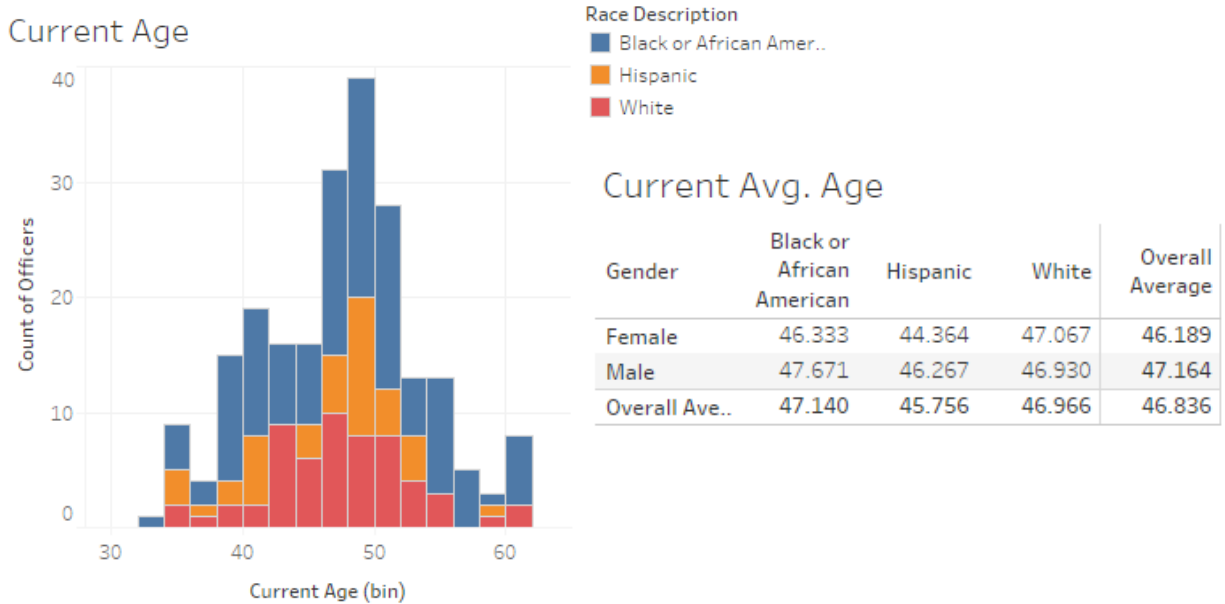


FIGURE 3: CPD officer count and title demographics by gender and race

Gender	Black or African American	Hispanic	White	Grand Total
Female	48 21.82%	11 5.00%	15 6.82%	74 33.64%
Male	73 33.18%	30 13.64%	43 19.55%	146 66.36%
Grand Total	121 55.00%	41 18.64%	58 26.36%	220 100.00%

Nature Assign	Black or African American	Hispanic	White	Grand Total
SCHOOL CAR	48 21.82%	11 5.00%	16 7.27%	75 34.09%
SCHOOL PATROL SUPERVISOR	2 0.91%	4 1.82%	7 3.18%	13 5.91%
SCHOOL SECURITY TEAM OFFICER	71 32.27%	26 11.82%	35 15.91%	132 60.00%
Grand Total	121 55.00%	41 18.64%	58 26.36%	220 100.00%

As the data shows:

- Women made up 34% of officers assigned to schools, compared to 22% of the force as a whole.

- Men accounted for 66% of officers assigned to schools, compared to 77% of the force as a whole.
- The average age for officers currently assigned to schools was 46.8 years old, compared to the average age of 42.4 years for the force as a whole.
- Black officers accounted for 55% of SROs, compared to 21% of the force as a whole.
- Hispanic officers accounted for 18.6% of SROs, compared to 25% of the force as a whole.
- White officers accounted for 26% of SROs, compared to 50% of the force as a whole.

According to the terms of the expired IGA, CPD should twice annually provide CPS with documentation indicating which schools are assigned SROs, how many SROs are assigned to each school, and the names of the officers.⁴⁸ However, according to CPS, CPD last provided a roster of officers in October of 2014. CPD should keep and maintain accurate records of SRO placements.

⁴⁸ City of Chicago, "Intergovernmental Agreement Between the City of Chicago and the Board of Education of the City of Chicago," accessed July 13, 2018, http://www.csc.cps.k12.il.us/purchasing/pdfs/contracts/2013_01/13-0123-PR12-1.pdf.

V. RECOMMENDATIONS

Partnerships between law enforcement agencies and school districts should be designed to ensure school safety and security, protect students' civil rights, and minimize any unnecessary student involvement in the criminal justice system.⁴⁹ In order to establish an effective and responsible SRO partnership with CPS that aligns with established best practices, CPD should do the following:

- Work with CPS, “juvenile justice entities, civil rights and community stakeholders” to draft and implement an MOU that “meets constitutional and statutory civil rights requirements.”⁵⁰ The MOU should:
 - State the purpose of the SRO partnership;
 - Outline the roles and responsibilities of CPD, CPS, and schools;
 - Emphasize that SROs should not be involved in routine student disciplinary matters;
 - Define what information CPS and CPD will share;
 - Establish required initial and ongoing training for officers assigned as SROs; and
 - Establish performance evaluations aligned with SROs' established roles and training that measure SROs' ability to de-escalate situations and use alternatives to arresting students;⁵¹
- Collaborate with CPS, students, families, and community stakeholders to create hiring guidelines for SROs;⁵²
- Create Department policies and procedures, aligned with best practices and the MOU, that address SRO recruitment, selection, placement, training, roles and responsibilities, and evaluation;
- Maintain and regularly update rosters of officers assigned to CPS; and
- Designate a program coordinator to enhance coordination and accountability

⁴⁹ Secretary John B. King, *Dear Colleague* (U.S. Department of Education, September 8, 2016), 1, accessed July 13, 2018, <https://www2.ed.gov/policy/gen/guid/school-discipline/files/ed-letter-on-sros-in-schools-sept-8-2016.pdf>.

⁵⁰ *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

⁵¹ *Memorandum of Understanding Fact Sheet* (U.S. Department of Justice Office of Community Oriented Policing Services), accessed July 13, 2018, https://cops.usdoj.gov/pdf/2017AwardDocs/chp/MOU_Fact_Sheet.pdf.

⁵² *Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURE Local Implementation Rubric* (U.S. Department of Education and U.S. Department of Justice), 2, accessed July 13, 2018, <https://www2.ed.gov/documents/press-releases/secure-implementation.pdf>.

VI. CONCLUSION

To protect and serve students, it is vital that CPD make *immediate* changes to ensure the safe and productive engagement of SROs with students and their families. The Department must, in collaboration with CPS, develop a comprehensive SRO program that includes guidelines for SROs' recruitment, selection, placement, training, roles and responsibilities, and evaluation. OIG recognizes CPD has stated that it is committed to reviewing and revising directives and policies to align with best practices and to address concerns noted by the community. These policy updates, along with future mandates within the upcoming consent decree, will support the Department's efforts to build relationships with the communities it serves based on mutual trust and respect. PS invited CPD to respond in writing to this review.

VII. AGENCY RESPONSE

In response to OIG's findings and recommendations, CPD identified the following steps they intend to take over the course of the next year:



- Undertake best efforts to enter into an MOU with CPS that clearly delineates authority and specifies procedures for CPD officer interaction with students while on school grounds;
- Develop a policy that defines SRO roles, responsibilities, and appropriate activities of SROs, which will include an express prohibition on the administration of school discipline by CPD officers and provisions for the collection, analysis, and use of data regarding CPD activities in schools;
- Develop and implement screening criteria to ensure SROs have the qualifications, skills, and abilities necessary to work safely and effectively with students, parents/guardians, and school personnel; and
- Ensure that all SROs receive initial specialized training and annual refresher trainings, and encourage SROs to exercise discretion to use alternatives to arrest and referral to juvenile court.

CPD did not address the following recommendations noted in the OIG report:

- Include a broad range of community stakeholders and CPS in the creation of the MOU;
- Create hiring guidelines and include a broad range of community stakeholders in the process;
- State the purpose of the SRO partnership with CPS in the MOU;
- Define information to be shared between CPD and CPS;
- Establish performance evaluations for SROs that align with developed roles and training that measure SROs ability to de-escalate and use alternatives to arresting students; and
- Maintain and regularly update rosters of SROs.

The Department's letter responding to the findings in this report is included in Appendix F.

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

Chicago Police Department		General Order G04-01-02	
 INVESTIGATIONS – CHICAGO PUBLIC SCHOOLS			
			
ISSUE DATE:	29 September 1988	EFFECTIVE DATE:	29 September 1988
RESCINDS:	D88-45		
INDEX CATEGORY:	Preliminary Investigations		

I. PURPOSE

This directive provides guidelines for Department members conducting a preliminary or follow-up investigation in a Chicago Public School or adjacent Board of Education property, e.g., school grounds, playgrounds, etc., during the time periods when the school is in session.

II. GENERAL INFORMATION

- A. The Board of Education has a policy of fully cooperating with law enforcement personnel conducting investigations within schools or adjacent Board of Education properties during hours while classes are in session.
- B. School officials including a principal or his designee are responsible for:
1. verifying the official identification of a Department member assigned to citizen's dress duty who enters a school for the purpose of interviewing, interrogating or arresting a student.
 2. providing the parents or guardian with a prompt notification whenever a Department member requests to interview, interrogate or take into custody a student in a school.
 3. substituting for the parents or guardian during the interview or interrogation of a student by a Department member whenever the parents or guardian of the student cannot be notified or are unavailable to respond to the school.
 4. notifying the parents or guardian of the student concerning the results of the interview or interrogation of the student.
 5. releasing a student to the custody of a department member in all instances whenever the responsible member has reasonable grounds and/or probable cause to arrest a student for a violation of the law or when there is an outstanding arrest warrant for a student.

III. MEMBER'S RESPONSIBILITIES

A Department member conducting a preliminary and/or follow-up investigation in a Chicago Public School during a time period when school is in session will:

- A. in other than cases of emergency, proceeds directly to the principal's office upon entry to a school.
- B. identify himself to the responsible school official whenever assigned to citizen's dress duty.
- C. describe the member's purpose for entering the school and request to interview and/or interrogate a named student(s).
- D. allow the school principal or his/her designee a reasonable amount of time to notify the parents or guardian of the student prior to beginning the interview or interrogation.
- E. postpone the interview and/or interrogation of the named student temporarily pending a prompt response by the parents or guardian to the school.
- F. permit the school principal or his/her designee to be present in the room in the school during the interview and/or interrogation of the student whenever the parents or guardian cannot be notified or they are unavailable to promptly respond to the school.

- G. ensure that:
 - 1. the responsible member's supervisor has been notified, when practicable, whenever a student is being taken into custody.
 - 2. there are reasonable grounds/probable cause present whenever a student is being taken into custody for a violation of the law or there is an outstanding arrest warrant for a student.
 - 3. a student who is taken into custody is provided with the Miranda Warnings prior to any questioning.
- H. advise the school principal or his/her designee relative to the location to which the student arrestee will be transported for further processing to facilitate a subsequent notification by the school principal or his/her designee to the parents or guardian of the student.
- I. be responsible for notifying the parents or guardian of the arrested student of the location of the police facility to which the student has been transported for further processing.
- J. be aware of the professional responsibilities of school officials to provide for the safety and well-being of all students in their care and to therefore conduct themselves in such a manner as to minimize any disruption of the school's normal operations.

LeRoy Martin
Superintendent of Police

88-074 RGB(mmd)

APPENDIX B: CPS STUDENT CODE OF CONDUCT

If approved by the CEO's designee, a student suspended for more than three (3) days may be required to attend a District-sponsored program during the term of suspension.

POLICE NOTIFICATION GUIDELINES

School administrators contact the Chicago Police Department (CPD) in two situations: (1) to seek assistance with an emergency situation, or (2) to notify law enforcement of a criminal act.

Emergency

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

In an emergency situation, administrators must make reasonable efforts to notify parents/guardians immediately after contacting CPD.

Criminal Acts

When a student engages in illegal activity, it may be necessary for school staff to report the act to CPD. In this situation, school officials contact CPD to report violations of the law. School officials must not contact CPD merely to request removal of a disruptive student from the school in a non-emergency situation.

In a non-emergency situation, administrators must make reasonable efforts to contact parents/guardians prior to contacting CPD.

The inappropriate behaviors that are clear violations of criminal law are identified in the next section with an asterisk (*) before the specific inappropriate behavior. The inappropriate behaviors that may be violations of criminal law are identified in the next section with a double asterisk (**) before the specific inappropriate behavior.

School officials must assess the situation before determining whether or not to contact CPD to report a criminal act. School officials should consider factors including:

- Whether the student distributed or was in possession of illegal drugs, narcotics, controlled substances, or "look-alikes" of such substances. If so, CPD must be notified.
- Whether the student was in possession of a firearm.² If so, CPD must be notified.

² See Reference Guide for definition.

- The severity of the criminal violation and the degree of harm to the school community,
- Whether a person was physically injured as a result of the student's conduct,
- Whether the student presents an imminent danger to the health, safety, or welfare of others, and
- The student's age. For a student in fifth (5th) grade or below, school staff must consult with the Law Department (773/553-1700) prior to reporting the act to CPD.

Once school staff members contact CPD, the responding police officers ultimately will determine whether or not to investigate, arrest, and/or take any other steps in response. School principals and staff do not have the authority to decide whether a student will be arrested. Moreover, responding police officers do not have the authority to decide whether a student will receive interventions or consequences at school. The school principal will use the SCC to determine the appropriate intervention(s) and/or consequence(s) to address a student's behavior.

Possible Violations of Criminal Law



*Consider factors above prior to notifying CPD

- Gambling (3-2)
- Forgery (3-7)
- False activation of a fire alarm that does not cause a school facility to be evacuated or does not cause emergency services to be notified (4-1)
- Extortion (4-2)
- Assault (4-3)
- Vandalism or criminal damage to property that costs less than \$500 (4-4)
- Battery or aiding or abetting in the commission of a battery which does not result in a physical injury (4-5)
- Fighting - more than two people and/or involves injury (4-6)
- Theft or possession of stolen property that costs less than \$150 (4-7)
- Possession, use, sale, or distribution of fireworks (4-8)
- Trespassing on CPS property (4-11)
- Use of intimidation, credible threats of violence, coercion, or persistent severe bullying (5-4)
- Inappropriate sexual conduct (5-7)
- Second or repeated violation of Behavior 4-14, use or possession of alcohol in school or at a school related function or before school or before a school related function (5-18)

Violations of Criminal Law***Consider factors above prior to notifying CPD**

- Knowingly or intentionally using the CPS network or information technology devices to spread viruses to the CPS network (4-12)
- Aggravated assault (5-1)
- Burglary (5-2)
- Theft or possession of stolen property that costs more than \$150 (5-3)
- Gang activity or overt displays of gang affiliation (5-6)
- Engaging in any other illegal behavior which interferes with the school's educational process, including attempt (5-8)
- Persistent or severe acts of sexual harassment (5-9)
- False activation of a fire alarm which causes a school facility to be evacuated or causes emergency services to be notified (5-10)
- Battery, or aiding or abetting in the commission of a battery, which results in a physical injury (5-12)
- Use of any computer, including social networking websites, or use of any information technology device to threaten, stalk, harass, bully or otherwise intimidate others, or hacking into the CPS network to access student records or other unauthorized information, and/or to otherwise circumvent the information security system (5-14)
- Vandalism or criminal damage to property that costs more than \$500 or that is done to personal property belonging to any school personnel (5-15)
- Use or possession of illegal drugs, narcotics, controlled substances, "look-alikes" of such substances, or contraband, or use of any other substance for the purpose of intoxication in school or at a school related function or before school or before a school related function (5-17)
- Participating in a mob action (5-19)
- Use, possession, and/or concealment of a firearm/destructive device or other weapon or "look-alikes" of weapons, or use or intent to use any other object to inflict bodily harm (6-1)
- Intentionally causing or attempting to cause all or a portion of the CPS network to become inoperable (6-2)
- Arson (6-3)
- Bomb threat (6-4)
- Robbery (6-5)
- Sale, distribution, or intent to sell or distribute alcohol, illegal drugs, narcotics, controlled substances, "look-alikes" or such substances, contraband, or any other substance used for the purpose of intoxication, or second or repeated violation of Behavior 5-17 (6-6)
- Sex acts which include the use of force (6-7)
- Aggravated battery, or aiding and abetting in the commission of an aggravated battery (6-8)
- Murder (6-9)
- Attempted murder (6-10)
- Kidnapping (6-11)
- Theft or possession of stolen property that costs more than \$1,000 (6-12)

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

 Chicago Police Department		Employee Resource E05-01	
PERFORMANCE EVALUATIONS OF ALL SWORN DEPARTMENT MEMBERS BELOW THE RANK OF SUPERINTENDENT			
			
ISSUE DATE:	11 September 2017	EFFECTIVE DATE:	11 September 2017
RESCINDS:	E05-01 Version 01 April 2009; E05-01-01 Version 21 February 2012; E05-01-02 Version 21 February 2012		
INDEX CATEGORY:	Career Development		

I. PURPOSE

This directive:

- A. continues annual performance evaluations for sworn members below the rank of sergeant using the electronic Performance Evaluation System (PES).
- B. Introduces the:
 - 1. annual performance evaluations for all sworn supervisors below the rank of Superintendent.
 - 2. Performance Evaluation—Sworn Supervisors form ([CPD-62.357](#)).
 - 3. Performance Improvement Plan (PIP)—Sworn Supervisors form ([CPD-62.358](#)).
- C. discontinues the use of the:
 - 1. Performance Rating Card (CPD-62.359).
 - 2. Performance Evaluation System (PES) for members the rank of captain.
- D. satisfies CALEA Law Enforcement Standard for Chapter 35.

II. POLICY

- A. The Department Is committed to ensuring that evaluations of all full-time employees are conducted and documented annually. The purposes of performance evaluations are to:
 - 1. standardize the nature of the personnel decision-making process;
 - 2. assure the public that Department personnel are qualified to carry out their assigned duties;
 - 3. provide members with the necessary information to assist them in maintaining appropriate behaviors;
 - 4. eliminate inappropriate behaviors; and
 - 5. comply with Municipal Code of Chicago MCC 2-84-400, which requires the Chicago Police Department to rate all sworn members.
- B. The assessment of a member's job performance is an ongoing process and the annual performance evaluation is not the only time during the year that supervisors should discuss performance issues with Department members.
- C. Ongoing coaching and feedback provides supervisors with opportunities throughout the year to:
 - 1. refocus members' efforts to enhance performance. Frequent feedback allows members to direct their attention to performance improvement needs and is intended to assist them in achieving higher levels of performance.
 - 2. communicate early to members any significant problems that exist and to provide advice and guidance to correct those problems.

- D. Performance evaluations will be conducted annually and will be completed upon an Administrative Message Center (AMC) announcement by the Director, Human Resources Division, unless otherwise established by this directive.
- E. The Director, Human Resources Division, will ensure that the performance evaluation dimensions are disseminated to all sworn Department members in the first quarter of the year.
- F. Command personnel are responsible for the administration of performance evaluations for all sworn members under their supervision and will ensure that performance evaluations are administered fairly and that all members are evaluated impartially and under the same standards set by this directive.
- G. Training will be provided to all supervisory members that will be responsible for evaluating Department members.

III. SWORN SUPERVISOR EVALUATIONS

- A. Performance evaluations for all sworn supervisors will be documented on the Performance Evaluation —Sworn Supervisors form. Command staff/unit commanding officers will ensure that:
 - 1. the top section of the form is completed for each sworn supervisor assigned to the unit and the form is distributed to evaluating supervisors.
 - 2. all supervisors are evaluated by the next higher-ranking supervisor in their immediate chain of command.
 - 3. a performance evaluation form for each sworn supervisor the rank of sergeant or above will be completed and:
 - a. the original form will be sent to the Human Resources Division and retained for five years.
 - b. a copy will be placed in the rated supervisor's Unit Watch Personnel File.
 - c. a copy will be given to the rated supervisor.
 - d. the annual evaluation will be entered into the CLEAR Watch Application by the date indicated by the Director, Human Resources Division.
 - 4. only sworn supervisors who have been under a supervisor's command for at least thirty days prior to the announcement of the evaluation period are evaluated. Those who have worked for a commanding officer for less than thirty days will be evaluated by their previously assigned supervisor.
- B. When applicable, the command staff/unit commanding officers will appoint teams of supervisors to evaluate their subordinates. Each team will operate under the direction of a higher-ranking supervisor.
- C. When applicable, lieutenants will confer with other supervisory members within their unit when evaluating sergeants. The same principle applies to higher ranks.
- D. A supervisor above the rank of the evaluated supervisor must sign the performance evaluation form. The command staff/unit commanding officers will ensure that the signatures of supervisory members are legible and in ink and that each supervisor has indicated his or her rank and star/employee number. Signature stamps will not be used.
- E. Supervisors will be evaluated in their assigned or detailed units if they were assigned to that unit for at least thirty days or more prior to the announcement of the evaluation period. If not, they will be evaluated by supervisors in the last unit of assignment or detail.
- F. A supervisor will not be evaluated if he or she has been:
 - 1. on the medical roll for an illness or injury, on or off duty, for six consecutive months or more immediately preceding the announcement of the evaluation period.
 - 2. on a leave of absence for six or more consecutive months immediately preceding the announcement of the evaluation period.

NOTE: The top portion of Performance Evaluation—Sworn Supervisors will be completed, the appropriate box marked, and the form forwarded to the Human Resources Division along with the other evaluations.

IV. RESPONSIBILITIES IN EVALUATING SUPERVISORS

- A. The evaluator will check the box indicating the evaluation category for each of the five performance dimensions on the evaluation form.
- B. Each evaluator must make comments (in the comment section of the form) for each category. Remarks will be pertinent and as specific as possible.
- C. The evaluator will sign his or her name and indicate rank, star/employee number, and the date in the space designated on the performance evaluation form.
- D. The evaluations will be reviewed, approved, and signed by the supervisor/exempt member in the evaluating supervisor's immediate chain of command. The signature of all supervisors must be legible and include rank and star/employee number.
- E. Each evaluator must evaluate his or her subordinates under the same set of fair and impartial standards as set by this directive.
- F. In evaluating supervisory personnel, the evaluator must not only consider the supervisor's performance, but also, when applicable, how well the supervisor motivates subordinates to perform. Willingness to take initiative, accept responsibility, and exercise discipline must all be considered when assessing performance.
- G. A supervisor's evaluation should not fluctuate greatly from period to period without sufficient cause.
- H. The evaluator must consider recognition received by the member such as Honorable Mentions, Department Commendations, or other awards. Likewise, a suspension or any type of disciplinary action or misconduct during the evaluation period must be addressed in the evaluation.
- I. With reference to "Dependability, Attendance, and Promptness," absences for medical reasons must be carefully evaluated before assigning an evaluation. The reasons, duration, and number of medical incidents are factors to be considered. A long-term absence due to injury or illness should not be viewed the same as multiple absences of short duration. Members absent because of injury on duty will not be penalized.
- J. In units where several supervisors have supervised the same member, they may confer with each other in evaluating the member.
- K. The evaluator will determine the overall performance evaluation category based on the evaluations received for each of the five performance dimensions and in accordance with the chart in Section VI-C of this directive.

V. PERFORMANCE DIMENSIONS FOR SUPERVISORS

- A. In assigning ratings based upon the five performance dimensions, evaluators will consider various components under each dimension, depending upon the job description of the supervisor being evaluated.
 1. **Enforcement of Work Standards and Staff Development:** Holds members responsible for job performance, compliance with Department policy, and addressing problems appropriately.
 - a. Uses positive feedback and goal setting to improve member performance.
 - b. Regularly observes and reviews member performance.
 - c. Uses appropriate occurrences as training to improve the future behavior of subordinates.
 - d. Administers progressive discipline when necessary.
 - e. Rates supervisors on their ability to train, evaluate, and monitor their subordinates, if applicable.

- f. Discusses new policies and procedures with members, both collectively and individually, to ensure that members understand when, how, and why a policy or procedure should be implemented.
 - g. Provides public feedback and public recognition; gives credit where credit is due.
 - h. Demonstrates sufficient knowledge of subordinates to be aware of their personal situations and potential problems that will affect work performance.
2. **Analysis and Problem Solving:** Is able to gather and analyze information from various sources related to a specific problem and is able to develop a plan to solve that problem based upon an objective analysis.
- a. Monitors conditions to identify and respond to emerging crime trends.
 - b. Allocates resources to an area before a problem escalates.
 - c. Develops contingency and fall-back plans.
 - d. Considers possible unintended consequences of a given course of action and thinks ahead to prevent long-term negative consequences.
 - e. Considers the impact of problems on other watches (when applicable) and provides support to those other watches in addressing those problems.
 - f. When applicable, creates formalized processes for members on different watches to share information about crime patterns, emerging problems, and any other issues related to the beat.
 - g. Recognizes when decisions will set precedent or cause liability and takes these factors into consideration.
 - h. Can justify decisions.
3. **Personal Leadership:** Motivates members and acts as a role model in demonstrating a positive attitude in service to the public.
- a. Creates a vision or goal for moving the Department forward and successfully communicates it to members.
 - b. Listens well and considers other viewpoints before making a decision.
 - c. Works well with supervisors, subordinates, and the public.
 - d. Negotiates conflicts fairly and effectively.
 - e. Leads by example and gets involved to help resolve problems and meet deadlines.
 - f. When applicable, reaches out and establishes relationships with community leaders to engage them in solving crime problems.
 - g. Adapts verbal and written language to the specific audience, whether Department members or the general public.
4. **Delegation of responsibilities:** Prioritizes and assigns tasks according to member's strengths and abilities.
- a. Identifies and builds on an individual member's strengths.
 - b. Delegates tasks to develop member strengths, when appropriate.
 - c. Explains the bigger picture when delegating work.
 - d. Structures teams and delegates work to ensure the best use of time and the most effective outcomes.
 - e. Keeps up-to-date on changing circumstances and prepares members for new demands.

5. Dependability, Attendance, and Promptness

- a. Demonstrates excellence in personal appearance, attendance, and promptness.
- b. Works well with little or no supervision.
- c. Can be relied on to complete assigned tasks; follows-up and finds solutions when tasks become complicated.
- d. Completes work in a timely manner.
- e. Responds promptly to requests for review of Department policy and procedures.

VI. EVALUATION CATEGORIES FOR SUPERVISORS

- A. The following four performance evaluation categories are used to evaluate a supervisor's job performance for each of the five performance dimensions:
 1. **Exceeds Expectations:** The member consistently displays performance of the duties and responsibilities of the job at a level that exceeds performance expectations for this dimension.
 2. **Meets Expectations:** The member meets job performance expectations for this dimension.
 3. **Requires Improvement:** The member must improve job performance to meet expectations for this dimension.
 4. **Unacceptable:** The member fails to meet job performance expectations for this dimension.
- B. A member's overall performance evaluation category will be derived from the evaluations received for each of the five performance dimensions.

C. Performance evaluations for supervisors will be determined as follows:

Category	Performance Evaluation Categories
Exceeds Expectations	Majority of individual dimension evaluations are "Exceeds Expectations." No individual dimension evaluations of "Requires Improvement." No individual dimension evaluations of "Unacceptable." - Eligible to be considered for specialized training. - Will have priority consideration for assessor assignments.
Meets Expectations	Majority of individual dimension evaluations are at least "Meets Expectations." No more than two individual dimension evaluations at "Requires Improvement." No individual dimension evaluations at "Unacceptable." - Eligible to be considered for specialized training. - Will be considered for assessor assignments.
Requires Improvement	Majority of individual dimension evaluations are "Requires Improvement." No more than two individual dimension evaluations of "Unacceptable." NOTE: For Captains A second period of Overall Evaluation in "Requires Improvement" will result in the initiation of the Captain SES removal process. - Not eligible for specialized training. - Not eligible for assessor assignments. - Not eligible for assignments outside district law enforcement.
Unacceptable	Three or more individual dimension evaluations of "Unacceptable." NOTE: For Captains: An Overall Evaluation of "Unacceptable" in a rating period will result in the initiation of the Captain SES removal process. - Not eligible for specialized training. - Not eligible for assessor assignments. - Not eligible for assignments outside district law enforcement.

VII. REVIEW OF SUPERVISOR EVALUATIONS

A. The evaluator will provide job performance feedback to supervisors receiving a performance evaluation at the conclusion of the rating period and will cover the following areas:

1. the result of the performance evaluation just completed;
2. the level of performance expected;
3. evaluation criteria or goals for the new reporting period; and
4. career suggestions relative to such topics as advancement, specialization, or training appropriate for the member's position. The evaluating supervisor will facilitate a member's career choices, comprehension of career goals, and achievement of career goals through meaningful and well-informed choices.

B. The evaluator will prepare a To/From Subject Report to his or her immediate supervisor requesting that a Performance Improvement Plan (PIP)—Sworn Supervisors (CPD-62.358) be prepared for any member who receives a rating for any performance dimensions in the "Requires Improvement" or "Unacceptable" category. If a Performance Improvement Plan (PIP)—Sworn Supervisor is approved, the evaluator will prepare the PIP and submit it to his or her immediate supervisor who will ensure that the PIP is reviewed during the next performance evaluation and that a copy is placed in the rated supervisor's Unit Watch Personnel File.

C. Command staff/unit commanding officers will ensure that after the evaluator and approving supervisor have signed the performance evaluation form, (and the PIP if applicable), the evaluator discusses the evaluation with the evaluated supervisor and informs him or her of the right to request a review of the evaluation.

NOTE: Command staff/unit commanding officer will ensure that any completed Performance Improvement Plan (PIP) - Sworn Supervisor are reviewed quarterly and that the recommendations for improvements are implemented.

D. The evaluated supervisor will sign and date the performance evaluation form in the space provided to indicate that he or she has reviewed the evaluation. A comments space is provided on the evaluation form for any comments the evaluated supervisor elects to include.

E. If a supervisor refuses to sign and date the performance evaluation form, the evaluator will indicate this action in the comments section by printing the words "Refused to Sign," followed by the evaluator's name and the date. All unsigned performance evaluation forms will be reviewed by the unit commanding officer, the district commander, or, when applicable, the next-level exempt member in a reviewed supervisor's chain of command, who will:

1. Interview the supervisor regarding the refusal and inform him or her of the appeal process, consistent with Item VIII of this directive.
2. affix his or her signature and the date of the interview on the back of the performance evaluation form, should the supervisor continue to refuse to sign the performance evaluation form.

F. Once the evaluation has been approved and signed by the supervisor/exempt member in the evaluator's chain of command, the evaluator will sign and date the performance evaluation form acknowledging that he or she has reviewed the evaluation with the evaluated member.

VIII. APPEAL PROCESS FOR SUPERVISORS

A. A supervisor may request a review of the performance evaluation within seven calendar days of the date the supervisor signed, or refused to sign, the performance evaluation form by submitting a To-From Subject report to the commanding officer of the unit assigned. If the commanding officer is the evaluator, the request will go to the next-level exempt member in the chain of command.

1. The exempt member/unit commanding officer will review all unsigned performance evaluation forms to determine if there is a request for review (member's report) on file.
2. If a performance evaluation form is unsigned and the supervisor has failed to request a review of the performance evaluation, the exempt member/unit commanding officer will interview the member to ensure that the member has had every opportunity to avail him or herself of the appeal process.

B. In response to a request for a review of an evaluation, the Department member hearing the review may interview or require written reports from any individual deemed appropriate. The decision of the reviewing member will be final and will be documented in writing. A copy of the reviewing member's report will be given to the member and another will be placed in the Unit Watch Personnel File. The original will be sent to the Human Resources Division and retained for five years.

C. If a performance evaluation is changed for any reason, the member hearing the appeal will ensure that a new performance evaluation form is prepared, signed, and dated by all parties. The new form will be completed and numbered "2 of 2" in the upper right-hand corner. The original form will be

numbered "1 of 2," marked "VOID," and attached by paper clip to the new form. Both forms will be sent to the Human Resources Division and will be retained for five years. One copy will be kept in the Unit Watch Personnel file and one given to the evaluated supervisor whose evaluation was changed. The evaluated supervisor has the right to request a review of his or her changed evaluation.

IX. PERFORMANCE EVALUATION SYSTEM (PES) FOR MEMBERS BELOW THE RANK OF SERGEANT

A. Members will be evaluated annually in the quarter prior to the quarter of the anniversary of their date of hire. The evaluations will be completed within thirty days of the conclusion of the evaluation period. The annual calendar quarters are as follows:

- 1st Quarter January, February, March
- 2nd Quarter April, May, June
- 3rd Quarter July, August, September
- 4th Quarter October, November, December

B. The following matrix clarifies when performance evaluations will be completed.

Quarter	Anniversary Date Month of the Member	The Quarter the Member Will Be Evaluated	Due Date of the Evaluation
1 st	January, February, March	4 th	30 January
2 nd	April, May, June	1 st	30 April
3 rd	July, August, September	2 nd	30 July
4 th	October, November, December	3 rd	30 October

If the member's date of hire is:

1. 31 March, the member's performance evaluation will be completed in the 4th Quarter. The due date for the performance evaluation will be 30 January.
2. 11 September, the member's performance evaluation will be completed in the 2nd Quarter. The due date for the performance evaluation will be 30 July.

C. Supervisors will participate in training and receive a Performance Evaluation System Procedure Manual regarding the purpose, implementation, and use of the Performance Evaluation System.

D. To effectively evaluate and document job performance of members under their command, supervisors will use the Performance Recognition System to record Early Intervention Activity Events, as delineated in the Department directive entitled "Performance Recognition System."

E. The Director, Human Resources Division, has overall authority over the PES and will coordinate the implementation, management, and monitoring of the evaluation process Department-wide.

X. PERFORMANCE EVALUATION CRITERIA FOR MEMBERS BELOW THE RANK OF SERGEANT

A. Members below the rank of sergeant will:

1. be evaluated by the supervisor(s) of the unit the member was assigned / detailed to for at least the thirty calendar days immediately preceding the announcement of the evaluation period.
2. not be evaluated who have been:
 - a. on the medical roll for an illness or injury, on or off duty, for six consecutive months or more immediately preceding the announcement of the evaluation period.
 - b. on a leave of absence for six consecutive months or more immediately preceding the announcement of the evaluation period.

3. be evaluated by supervisor(s) who may consult with other supervisors the member has worked with if the member has worked for more than one supervisor during the evaluation period.

B. Performance Dimensions

There are five performance dimensions used in the evaluation of a member's job performance:

1. **Accountability / Dependability:**
 - a. Takes responsibility for job performance in the assignment area and for commitments, actions, and decisions.
 - b. Works effectively with minimal supervision and shows initiative by following through on assignments without prompting.
 - c. Adheres to work schedules and completes work activities in a timely manner.
2. **Problem Solving / Decision Making:**
 - a. Recognizes and diagnoses problems accurately, effectively, and in a timely manner.
 - b. Identifies the need for information and where to find it, using an open mind to evaluate the relevance and accuracy of the information.
 - c. Collects and organizes information and makes valid and timely decisions using sound judgment to provide alternative solutions to problems.
3. **Adaptability / Responsiveness:**
 - a. Adapts rapidly and easily to changing demands and circumstances.
 - b. Maintains calm and displays restraint and perseverance when faced with unexpected obstacles, opposition, or hostility.
4. **Communication:**
 - a. Presents information in a well-organized manner, speaks and writes clearly, and understands the meaning of spoken and written information.
 - b. Makes a conscious effort to listen, analyze, and effectively respond to what others say and relates to others by demonstrating diplomacy and tact.
5. **Job Knowledge / Professional Development:**
 - a. Has knowledge of relevant laws, Department policies and procedures, and techniques related to job assignment and applies this knowledge when performing job activities.
 - b. Seeks out learning opportunities and continually develops professional skills and knowledge.
 - c. Uses feedback from others to further develop knowledge and skills.

C. Evaluation Categories

There are four categories used to evaluate a member's job performance for each of the performance dimensions:

1. **Exceeds Expectations:** The member consistently displays performance of the duties and responsibilities of the job at a level that exceeds performance expectations for this dimension.
2. **Meets Expectations:** The member meets job performance expectations for this dimension.
3. **Requires Improvement:** The member must improve job performance to meet expectations for this dimension.
4. **Unacceptable:** The member fails to meet job performance expectations for this dimension.

D. Overall Performance Evaluation Category

1. A member's overall performance evaluation category will be based on the evaluations received for each of the five performance dimensions.
2. Described below is a summary of criteria associated with a member's overall performance evaluation category.

Category	Performance Evaluation Categories for members below rank of sergeant
Exceeds Expectations	<p>Majority of individual dimension evaluations are "Exceeds Expectations."</p> <p>No individual dimension evaluations of "Unacceptable" or "Requires Improvement."</p> <p>- Eligible for merit consideration and special assignments.</p>
Meets Expectations	<p>Majority of individual dimension evaluations are at least "Meets Expectations."</p> <p>No more than one individual dimension evaluation of "Unacceptable" or "Requires Improvement."</p> <p>A second year with an "Unacceptable" evaluation on the same dimension will place the member in the overall "Requires Improvement" evaluation category.</p> <p>- Eligible for merit consideration and special assignments.</p>
Requires Improvement	<p>Majority of individual dimension evaluations are "Requires Improvement."</p> <p>No more than two individual dimension evaluations of "Unacceptable."</p> <p>- Three consecutive years of "Requires Improvement" Overall Performance Evaluations will place the member in the "Unacceptable" category and no salary step increase will be given.</p> <p>- Not eligible for merit consideration, special assignments, or special employment.</p>
Unacceptable	<p>Three or more individual dimension evaluations of "Unacceptable."</p> <p>- No salary step increase.</p> <p>- Not eligible for merit consideration or special assignments, special employment, or working secondary employment.</p> <p>- Two consecutive years of "Unacceptable" Overall Performance Evaluations will result in charges being filed to terminate employment based on incompetency or inefficiency in performance of duty.</p>

XI. RESPONSIBILITIES UNDER THE PES SYSTEM

A. District/unit commanding officers will:

1. monitor the PES process to ensure that it is administered fairly and is conducted equitably by supervisors under their command.

2. review evaluations submitted by designated supervisors under their command and indicate concurrence or non-concurrence with the evaluation results. If the district / unit commanding officer:
 - a. concurs with a performance evaluation, the evaluation will be approved.
 - b. does not concur with a performance evaluation, the evaluation will be returned to the designated supervisor for comments supporting the evaluation and/or revisions if necessary.
 3. designate the appropriate unit supervisor to oversee the PES process for their watch.
- B. Designated unit supervisors will:
1. oversee the PES process for their watch.
 2. ensure that:
 - a. ratings are entered into the PES and are forwarded to the district / unit commanding officer for review.
 - b. any member transferred into the unit during the quarter of that member's performance evaluation period receives an evaluation that reflects the member's performance for the entire evaluation period and not only for the time spent in the new unit.
 3. identify which supervisors will provide each Department member's performance evaluation and job performance feedback during any quarter.
 4. print the preliminary ratings to be reviewed and lead the performance evaluation review session.
- C. Reviewing supervisors will:
1. be notified of which members are to receive their yearly performance evaluation one month prior to the month the evaluations are due.
 2. independently consider the job performance of each identified sworn member under their command.
 3. review performance information contained in the member's portfolio within the Performance Recognition System and contact the member's supervisors in previous units of assignments / details, if the member was assigned / detailed to another unit for a period of twenty-eight days or more during the evaluation period, to provide an accurate assessment of job performance.
 4. independently provide preliminary evaluations for members designated for their review and enter a preliminary rating for each dimension.
 5. participate in a performance evaluation review session, under the direction of the designated unit supervisor / unit commanding officer, to:
 - a. review and discuss the:
 - (1) the job performance of any member for whom there is a divergent rating on one or more dimensions.
 - (2) specific events that support the preliminary performance rating they gave for the dimension(s) in question.
 - b. support their ratings with specific examples as to why they gave a particular rating for any member under discussion.
 - c. evaluate each affected member with the objective of reaching a consensus on the appropriate rating for each divergent performance evaluation dimension.

- D. Supervisors designated to provide members with their overall performance evaluation will:
1. provide job performance feedback to members receiving a performance evaluation.
 2. prepare a Performance Improvement Plan (PIP) if any member receives a rating for any performance dimension in the "Requires Improvement" or "Unacceptable" category.

XII. REVIEW OF EVALUATIONS FOR MEMBERS BELOW THE RANK OF SERGEANT

- A. Sworn members:
1. will have access to review their evaluations for each dimension and their overall performance evaluation.
 2. whose job performance has been evaluated will accept or reject their performance evaluation in the PES.
- B. The evaluator will provide job performance feedback to members receiving a performance evaluation at the conclusion of the rating period and will cover the following areas:
1. the result of the performance evaluation just completed;
 2. the level of performance expected;
 3. evaluation criteria or goals for the new reporting period; and
 4. career suggestions relative to such topics as advancement, specialization, or training appropriate for the employee's position. The evaluating supervisor will facilitate a member's career choices, comprehension of career goals, and achievement of career goals through meaningful and well-informed choices.
- C. If a member does not accept a rating for an individual dimension or the overall performance evaluation, the supervisor will document that the member has rejected the evaluation in the PES.
- D. The designated unit supervisor/unit commanding officer will:
1. review all rejected performance evaluations;
 2. interview the member regarding his or her rejection of the evaluation and verbally inform the member of the appeal process that may be exercised within seven calendar days of the interview; and
 3. document the interview in the PES and indicate whether the member continued to reject the evaluation.

XIII. APPEAL PROCESS FOR MEMBER BELOW THE RANK OF SERGEANT

- A. Primary
1. Sworn Department members may:
 - a. appeal their overall performance evaluation and their performance dimension assessments.
 - b. request a review of their performance evaluation by the district / unit commanding officer. The member will document the reasons for rejection of the evaluation within the PES within seven calendar days of the date the member reviewed and refused to accept the overall performance evaluation rating.
 2. District/unit commanding officers will:
 - a. review rejected performance evaluations.
 - b. conduct an appeal meeting with the member to discuss the performance evaluation.
 3. In response to a request for a review of a performance evaluation, the district/unit commanding officer may require written reports from any individual deemed appropriate. The

decision of the district/unit commanding officer as to the appropriate rating is final for any rating other than "Unacceptable" and will be documented in the automated system.

B. Final Level Review

1. If a member's overall performance evaluation rating remains "Unacceptable" after the primary appeal with the district/unit commanding officer, the member may request a secondary review with the appropriate deputy chief, via the PES, within seven calendar days of the date the member reviewed and refused to accept the overall performance evaluation rating by the district/unit commanding officer.
2. In response to a request for a review of a performance evaluation, the deputy chief may require written reports from any individual deemed appropriate. The decision of the deputy chief as to the appropriate rating is final and will be documented in the automated system.

Authenticated by: KC

Kevin Navaro
Acting Superintendent of Police

SS 16-091

APPENDIX D: LIST OF SCHOOLS SROS WERE ASSIGNED TO DURING THE 2017-2018 SCHOOL YEAR (OBTAINED FROM CPS)

SY 17 School List		
Police District	School Name	Address
001	Jones College Prep	700 S State St Chicago IL 60605
001	Dunbar H.S.	3000 S King Dr Chicago IL 60616
002	Phillips	244 E Pershing Rd Chicago IL 60653
002	Martin Luther King	4445 S Drexel Blvd Chicago IL 60653
002	Chicago Milit Acad	3519 S Giles Ave Chicago IL 60653
002	DuSable Leadership Academy	4934 S Wabash Ave Chicago IL 60615
002	Kenwood Academy	5015 S Blackstone Ave Chicago IL 60615
002	Dyett H.S.	555 E. 51st Street Chicago IL 60615
003	Hyde Park	6220 S Stony Island Ave Chicago IL 60637
004	Chicago Vocational	2100 E 87th St Chicago IL 60617
004	Bowen	2710 E 89th St Chicago IL 60617
004	Washington	3535 E 114th St Chicago IL 60617
005	Harlan	9652 S Michigan Ave Chicago IL 60628
005	Corliss	821 E 103rd St Chicago IL 60628
005	Carver Milit Acad	13100 S Doty Ave Chicago IL 60627
006	Hirsch Metro	7740 S Ingleside Ave Chicago IL 60619
006	Simeon	8147 S Vincennes Ave Chicago IL 60620
007	South Side Occup	7342 S Hoyne Ave Chicago IL 60636
007	Hope College Prep	5515 S Lowe Ave Chicago IL 60621
007	Robeson	6835 S Normal Blvd Chicago IL 60621
007	Englewood	845 W 69th St Chicago IL 60621
007	Harper	6520 S Wood St Chicago IL 60636
007	Lindblom	6130 S Wolcott Ave Chicago IL 60636
008	Curie	4959 S Archer Ave Chicago IL 60632
008	Goode	7651 S Homan Ave Chicago IL 60652
008	Gage Park	5630 S Rockwell St Chicago IL 60629
008	Hubbard	6200 S Hamlin Ave Chicago IL 60629
008	Bogan	3939 W 79th St Chicago IL 60652

Police District	School Name	Address
008	Kennedy	6325 W 56th St Chicago IL 60638
008	Hancock	4034 W 56th St Chicago IL 60629
008	Solorio	5400 S St Louis Ave Chicago IL 60632
009	Kelly	4136 S California Ave Chicago IL 60632
009	Richards	5009 S Laflin St Chicago IL 60609
009	Tilden	4747 S Union Ave Chicago IL 60609
009	Air Force Academy	3630 S Wells St Chicago IL 60609
009	Back of the Yards	2111 W 47th St Chicago IL 60609
010	Farragut	2345 S Christiana Ave Chicago IL 60623
010	Collins	1313 S Sacramento Dr Chicago IL 60623
010	Little Village	2620 S Lawndale Ave Chicago IL 60623
11	Westinghouse	3223 W Franklin Blvd Chicago IL 60624
011	Manley	2935 W Polk St Chicago IL 60612
011	Marshall	3250 W Adams St Chicago IL 60624
011	Al Raby	3545 W Fulton Blvd Chicago IL 60624
011	Orr	730 N Pulaski Rd Chicago IL 60624
012	Clemente	1147 N Western Ave Chicago IL 60622
012	Whitney Young	211 S Laflin St Chicago IL 60607
012	Crane Tech	2245 W Jackson Blvd Chicago IL 60612
012	Juarez	2150 S Laflin St Chicago IL 60608
012	Wells	936 N Ashland Ave Chicago IL 60622
015	Douglass	543 N Waller Ave Chicago IL 60644
015	Austin H.S.	231 N Pine Ave Chicago IL 60644
015	Michelle Clark	5101 W Harrison St Chicago IL 60644
016	Taft	6530 W Bryn Mawr Ave Chicago IL 60631
016	Foreman	3235 N LeClaire Ave Chicago IL 60641
017	Von Steuben	5039 N Kimball Ave Chicago IL 60625
017	Roosevelt	3436 W Wilson Ave Chicago IL 60625
017	Carl Schurz	3601 N Milwaukee Ave Chicago IL 60641

Police District	School Name	Address
017	North Side Prep	5501 N Kedzie Ave Chicago IL 60625
018	Lincoln Park	2001 N Orchard St Chicago IL 60614
018	Ogden	1250 W Erie St Chicago IL 60642
019	Lake View	4015 N Ashland Ave Chicago IL 60613
019	Lane Tech	2501 W Addison St Chicago IL 60618
019	Uplift	900 W Wilson Ave Chicago IL 60640
020	Amundsen	5110 N Damen Ave Chicago IL 60625
020	Mather	5835 N Lincoln Ave Chicago IL 60659
020	Senn	5900 N Glenwood Ave Chicago IL 60660
022	Morgan Park	1744 W Pryor Ave Chicago IL 60643
022	Percy Julian	10330 S Elizabeth St Chicago IL 60643
022	Christian Fenger	11220 S Wallace St Chicago IL 60628
024	Sullivan H.S.	6631 N Bosworth Ave Chicago IL 60626
025	Kelvyn Park	4343 W Wrightwood Ave Chicago IL 60639
025	Prosser	2148 N Long Ave Chicago IL 60639
025	Steinmetz	3030 N Mobile Ave Chicago IL 60634
025	North-Grand H.S.	4338 W Wabansia Ave Chicago IL 60639

APPENDIX E: EXTENSION LETTER



Rahm Emanuel
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Eddie T. Johnson
Superintendent of Police

Joseph M. Ferguson
Inspector General
Office of the Inspector General
740 North Sedgwick, Suite 200
Chicago, IL 60654

July 27, 2018

Reference: Review of the Chicago Police Department's Management of School Resource Officers

Dear Inspector General Joseph M. Ferguson:

This correspondence serves as the Chicago Police Department (CPD)'s request for an extension of thirty (30) days in order to respond to the above-referenced report. Additional time is needed to confer with representatives of the Chicago Public Schools concerning the recommendations delineated in the report issued 18 July 2018. Should the CPD's extension request be granted, its response would be due 4 September 2018. (September 1st falls on the weekend and Labor Day is 3 September.)

If you have any questions or concerns, please feel free to contact Deputy Director Tina Skahill of the Office of the General Counsel at (312) 745-6115.

Sincerely,

A handwritten signature in black ink that reads "Eddie T. Johnson". The signature is fluid and cursive.

Eddie T. Johnson
Superintendent of Police

APPENDIX F: DEPARTMENT RESPONSE TO OIG



Rahm Emanuel
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Eddie T. Johnson
Superintendent of Police

September 4, 2018

Joseph M. Ferguson
Inspector General
City of Chicago
Office of Inspector General
740 North Sedgwick Street, Suite 200
Chicago, Illinois 60654

Dear Inspector General Ferguson:

This letter is in response to the City of Chicago Office of Inspector General's ("OIG") report entitled, Review of the Chicago Police Department Management of School Resource Officers (July 18, 2018).

Maintaining and promoting the safety and security of children, teachers, and other staff of Chicago Public Schools ("CPS") is of great importance to the Chicago Police Department ("CPD" or "Department"). CPD has demonstrated an on-going commitment to those efforts by deploying copious resources and providing police officers to designated schools to enhance safety and deter crime. It is in this light, that CPD expresses its appreciation to the OIG for providing their evaluation of the Department's School Resource Officer ("SRO") program. We thank you for your patience while we reviewed the report. We have taken your concerns seriously, and deeply value your recommendations.

As you know, CPD is presently engaged in the latter stages of negotiations that will lead to a consent decree with the Illinois Attorney General's Office. This serious undertaking will align our operational functions with best practices and constitutional policing. To achieve those goals, the draft consent decree will require that CPD reform its SRO program by formally adopting a comprehensive doctrine of policies that reflect national best practices for school resource officer programs. After reviewing the OIG's report, CPD is pleased to find that the revisions to our current policies by the draft consent decree relating to the SRO program will mirror the OIG's recommendations. We provide our new practices and specific responses to your recommendations in greater detail below.

Recommendation #1: CPD draft and implement a Memorandum of Understanding (MOU) in collaboration with CPS and community stakeholders that establishes a comprehensive program, and that outlines the roles and responsibilities of CPD.

Department Response: The Department agrees with this recommendation. Pursuant to the draft consent decree, the Department will before the 2019-2020 school year begins, undertake best efforts to enter into a memorandum of understanding with CPS, that clearly delineates authority and specifies

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procedures for CPD officer interaction with students while on school grounds, consistent with the law, best practices, and this Agreement.

Recommendation #2: CPD should formally outline the SRO's roles and responsibilities, which shall contain an explicit prohibition of SROs from intervening in routine student disciplinary matters.

Department Response: The Department agrees with this recommendation. Before the 2019-2020 school year begins, in consultation with CPS, CPD will develop a policy that clearly defines the roles, responsibilities and appropriate actions of SROs, and which will include an express prohibition on the administration of school discipline by CPD officers. The policy will reflect best practices and will contain the collection, analysis, and use of data regarding CPD activities in CPS schools.

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

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

Recommendation #4: CPD should establish policies requiring school-specific training for officers before they begin working as SROs, as well as regular refresher trainings. These trainings should emphasize alternatives to arresting students as well as topics such as, constitutional and civil rights, childhood and adolescent development, age-appropriate response to student conduct, disability and special education issues, conflict resolution and de-escalation techniques, restorative justice techniques, and interacting with specific student groups such as those with limited English proficiency or who are lesbian, gay, bisexual or transgender.

Department Response: The Department concurs with this recommendation. As such, under the draft consent decree, CPD has already committed to ensuring that all officers assigned to work in CPS schools will receive specialized initial and annual refresher training that is adequate in quality, quantity, scope and type, and that addresses subjects including, but not limited to: (1) school-based legal topics, (2) cultural competency, (3) problem-solving, (4) de-escalation, (5) use of restorative approaches, (6) disability issues, (7) childhood and adolescent development, (8) crisis interventions, and (9) methods and strategies that create positive interactions with specific student groups such as those who are LGBTQIA individuals, a person of color, have limited English proficiency, or who are experiencing homelessness.

Additionally, when interacting with youth, CPD will encourage officers to exercise discretion to use alternatives to arrest and alternatives to referral to juvenile court, including, but not limited to: issuing warnings, and providing guidance; referral to community services and resources such as mental health,

drug treatment, mentoring, and counseling organizations, educational services and other agencies; station adjustments; and civil citations.

Recommendation #5: CPD should designate a program coordinator to enhance coordination and accountability.

Department Response: At the present time, the SRO program functions under the Bureau of Patrol. The Department will give careful consideration to this recommendation for a program coordinator for the SRO program moving forward.

The new practices CPD will put in place to meet the terms of the forthcoming consent decree track very closely with the OIG's recommendations. In fact, nearly all of the OIG's recommendations are incorporated into the terms of the draft consent decree.

The Chicago Police Department is certain that it will deliver on creating a strong SRO program rooted in partnership between CPD and CPS, that meets national best practices standards, and protects students' civil rights. Nonetheless, the Department welcomes the opportunity to discuss with you any of the OIG's recommendations that you do not believe we have addressed by this letter or by the draft consent decree.

Sincerely,



Eddie T. Johnson
Superintendent of Police

MISSION

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government. OIG achieves this mission through,

- administrative and criminal investigations by its Investigations Section;
- performance audits of City programs and operations by its Audit and Program Review Section;
- inspections, evaluations and reviews of City police and police accountability programs, operations, and policies by its Public Safety Section; and
- compliance audit and monitoring of City hiring and employment activities by its Hiring Oversight Unit.

From these activities, OIG issues reports of findings and disciplinary and other recommendations to assure that City officials, employees, and vendors are held accountable for violations of laws and policies; to improve the efficiency, cost-effectiveness government operations and further to prevent, detect, identify, expose and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, -240, and -250.

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