

North Charleston Police Department Racial Bias Audit

Summary of CNA's Approach,
Positioning, and Team

September 4, 2020



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1. Introduction

CNA is pleased to provide more information to the City of North Charleston, South Carolina, about our approach, team, and qualifications to perform a racial bias audit for the City and the North Charleston Police Department (NCPD). As a leader in the field of justice system research, CNA has played an important role in building innovative and effective policing principles and practices through our research, analysis, and support to national training and technical assistance programs.

The deaths of George Floyd and Breonna Taylor, the resulting nationwide protests and unrest, and other localized issues and concerns have highlighted the urgent need for accountability, transparency, and legitimacy in policing. The City of North Charleston has recognized this need and has requested an organizational assessment and racial bias audit of the NCPD, including a thorough review of protocols, practices, and behaviors. This review will culminate in a report with findings, observations, and recommendations for policy, procedure, and structural changes to NCPD to ensure that the department uses best practices and sound policies and procedures in all phases of its work.

On August 27, 2020, at request of the City of North Charleston, CNA met with the City's Racial Bias Committee to share our approach and team for conducting a racial bias audit for the City and NCPD. At the request of the City, CNA shares more information about our approach, team, and qualifications to perform this review. This proposal incorporates a draft scope of work provided by the City. CNA is prepared to engage flexibly with the City and local stakeholders to ensure that the audit meets all local needs.

CNA is a nonprofit research organization with a strong history of delivering high-quality, independent, and objective assessments of law enforcement agencies, particularly on topics such as racial disparity and bias. As a leader in the field of justice system research, CNA has played an important role in building innovative and effective policing principles and practices through our research, analysis, and support to national training and technical assistance programs. We work directly with more than 450 large, mid-sized, and small police agencies to support, assess, implement, monitor, and evaluate the justice system. This includes specialized expertise and experience reviewing and assessing law enforcement agencies for bias and disparities due to race or ethnicity in relation to law enforcement activities, such as use of force, searches, arrests, charges, and citations. We will provide the City of North Charleston with the best opportunity for success in identifying policies and practices that may be contributing to racial disparities in law enforcement activities and translating these findings into actionable and sustainable recommendations to allow NCPD to fairly and effectively serve its community.

2. Approach

In order to examine systemic and individual racial bias, including perceived and implicit bias, CNA will work closely with all segments of the community, city officials, and NCPD

personnel. Our team will assess, analyze, and make recommendations to improve departmental operations and help strengthen and rebuild trust with the community.

Goals of the audit

CNA supports and applauds the City’s noted audit goals, described in the draft scope of work, namely:

- Review and understand general data relating to North Charleston demographics, communities, and community needs & goals.
- Review and understand general data and demographics relating to North Charleston crime statistics (including information relating to crime victims, subjects / suspects, and calls for service) overall, and within various communities within the City.
- Assess and assist the efforts of the North Charleston Police Department (NCPD), in concert with the community, to uncover any aspects of implicit bias, including systemic and individual racial bias.
- Assess the impact of enforcement operations on historically marginalized and discriminated against populations, particularly the African American and Hispanic communities (hereinafter “HMDA population.”)
- Provide recommendations to improve community-oriented policing practices, transparency, professionalism, accountability, community inclusion, fairness, effectiveness, training (including FTO program) and public trust. Such recommendation should take into account national best practices and community expectations.
- Engage the community to understand the experiences and expectations of interactions with NCPD.

Scope of assessment and support

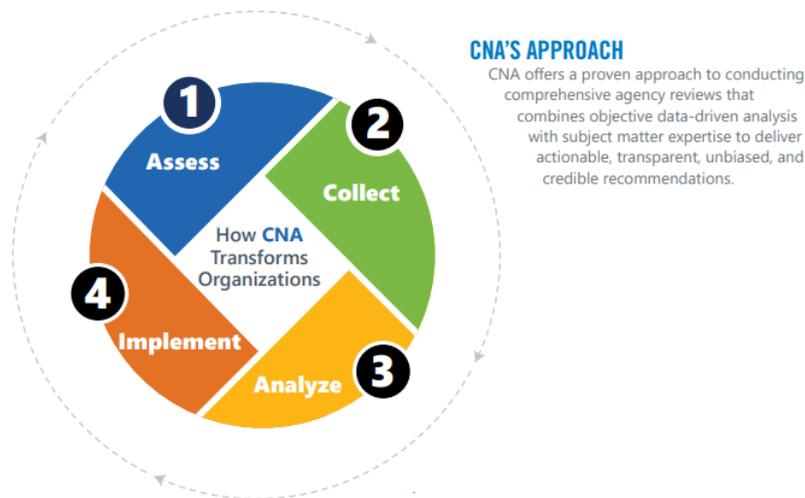
In order to meet these goals of examining systematic and individual racial bias, including perceived and implicit bias, CNA will work closely with all segments of the community, city officials and NCPD personnel. Our team will assess analyze, and make recommendations as it relates to five core areas, as outlined below. Throughout all stages of our assessment we will emphasize community input and expectations, and rely on our extensive knowledge of national best practices towards building stronger relationships.

- (1) Impact of policy and practice on historically marginalized and minority populations, including communities of color, particularly African American and Hispanic communities;
- (2) Community-oriented, problem-solving policing practices;

- (3) Use-of-force practices and outcomes;
- (4) Complaint process, internal and external; and
- (5) Recruitment, hiring, promotions and personnel practices.

Figure 1 illustrates CNA’s approach to projects of this nature; this recognizable method of problem-solving is closely based on the SARA (scanning, analysis, response, and assessment) model.

Figure 1. CNA's assessment and analysis approach



CNA has customized this model approach to the particular topics and focus of the assessment for North Charleston. Our approach comprises of three major tasks:

- Task 1: Data collection and analysis
- Task 2: Development of findings, recommendations, and report
- Task 3: Implementation support

Implementation is a critical aspect of police reform. We also describe our approach to ongoing monitoring and implementation support, if the City determines this to be of interest. To allow the City to make an informed decision in light of local budget and financial constraints, we provide the budget for the audit and the implementation support separately.

Planned deliverables

CNA will provide each of the deliverables highlighted in the draft scope of work, ensuring that the City of North Charleston, NCPD, and the community derive the maximum benefit from our work. In particular, CNA will:

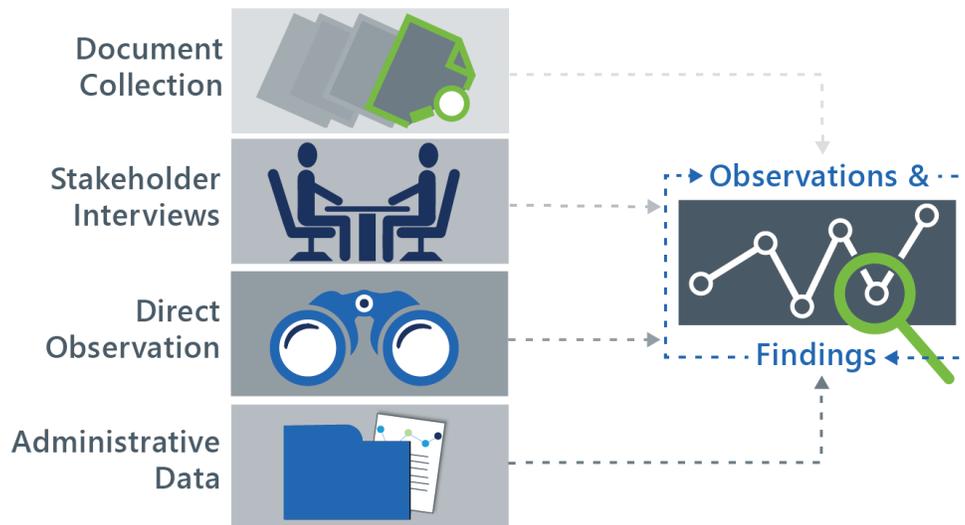
- Provide regular updates to the City Council, other City officials, NCPD, and the community on our progress and assessment findings, to include presentation of draft findings and recommendations prior to finalizing the report.
- Develop a detailed final report that covers all elements of the proposed scope of work. This report will include:
 - Identification of areas of high performance as well as recommendations for improvement;
 - Best practices and innovations that NCPD should implement in response to findings and recommendations;
 - Actionable recommendations, to cover program refinements, new strategies, resource modifications;
 - Ranking of recommendations by priority and estimates of necessary resources required to implement recommendations;
- Deliver the report in a format specified by the City.
- Present the final report to the City, NCPD, and the community.

Task 1: Data collection and analysis

CNA will begin our engagement with the City of North Charleston by holding a virtual kickoff meeting with appropriate stakeholders and gathering feedback and input on our proposed approach and report development. CNA has gained direct local experience holding these preliminary meetings and information-gathering sessions in our assessment work with numerous other agencies, including the Charleston, South Carolina, Police Department; the Fayetteville, North Carolina, Police Department; the Las Vegas, Nevada, Metropolitan Police Department (LVMPD); the Maricopa County, Arizona, Sheriff’s Office (MCSO); and the Philadelphia, Pennsylvania, Police Department. It is our experience that holding kickoff meetings reduces challenges and roadblocks during project execution because such meetings set clear expectations, present opportunities for collaboration, and allow the site to provide information about its community. We will also use the kickoff meeting to establish a schedule for regular check-in calls with key stakeholders and an agreement on timelines and other elements of the project plan.

Following the kickoff meeting, the CNA team will execute four information collection efforts in support of the assessment (illustrated in Figure 2) document collection, interviews, direct observations, and administrative data collection. By conducting a comprehensive data collection effort, we will ensure that we can develop practical, customized, and feasible findings and recommendations.

Figure 2. Information collection approach



To support thorough data collection and analysis, CNA will require, as noted in the draft scope of work, access to NCPD personnel at various levels, including school resource officers (SROs). We will also require access to all the data sources described within this proposal, including documents, administrative data, internal files such as complaints and incident reports, traffic and investigatory stops, and engagement with City personnel, NCPD personnel, and community members through a variety of means. We will also consider the demographic makeup of the department and its specialized units. We will also rely on our knowledge of surrounding jurisdictions’ and national peer agencies’ best practices through all stages of the audit.

In the remainder of this section on data collection and analysis, we outline in detail how our data collection efforts will accomplish the specified assessment topics and scope, followed by our descriptive approach for conducting each data collection activity.

The City of North Charleston developed an impressive and comprehensive list of assessment topics to be covered during this audit, noted in the provided scope of work. CNA has incorporated these topics into our data collection and analysis plan, described in detail below. In Table 1, we summarize through which data sources and analysis segments of the audit we will cover each of the specific items described in the scope of work.

Table 1. Alignment of assessment approach to scope of work

| Assessment topic | Data source | | | |
|---|-------------|-----------------------------------|---------------------|---------------------|
| | Documents | Interviews and listening sessions | Direct observations | Administrative data |
| Assess enforcement operations, including evaluation of written and unwritten policies, procedures, data, and training | ✓ | ✓ | ✓ | ✓ |
| Patterns and trends in interactions with the public, including calls for service, field contacts, pedestrian stops, traffic stops, and investigatory stops | | | | ✓ |
| The outcome of stops (i.e., field interview, warning, frisk, search and seizure, ticketing, arrest, and use of force.) | | | | ✓ |
| The total number of stops, as well as the efficacy of current practices in reducing crime and the public perception/community trust issues flowing from current practices | | ✓ | | ✓ |
| Officer training in racial bias, use of force, firearms, less-lethal weapons, crisis intervention, de-escalation, vehicle pursuits, and defensive tactics | ✓ | ✓ | ✓ | ✓ |
| A select percentage of internal investigations of critical incidents, internal affairs investigations, and uses of force | | | | ✓ |
| Patterns and trends in use of force with focus on city geography, community characteristics, calls for service, departmental units, incident factors, subject demographics, and officer demographics | | | | ✓ |
| Patterns and trends of encounters of SRO with youth in schools with focus on city geography, community characteristics, calls for service, departmental units, incident factors, subject demographics, and officer demographics | | | | ✓ |
| NCPD's incident review practices and its mechanisms for oversight, accountability, and organizational learning to address identified issues, including the issue of bias | ✓ | ✓ | | |
| The relationship between NCPD deployment, calls for service, and crime data to determine whether resources are being assigned in a manner consistent with objective data and not skewed by subjective bias | | ✓ | | ✓ |
| Assess community-oriented policing practices | ✓ | ✓ | ✓ | ✓ |
| Policies, practices, and training intended to institutionalize community policing, procedural justice, and fair and impartial policing as an organizational philosophy | ✓ | ✓ | | |
| An assessment of officer activity throughout the department to identify the degree to which officers are effectively performing community policing, problem-solving, and non-traditional policing strategies | | ✓ | | ✓ |
| Review of the department's organizational strategies and plans for community-oriented policing, including Neighborhood Resource Officer programming and performance. | ✓ | ✓ | | |
| Review of the department's transparency efforts and the effectiveness of its public communication regarding policies, procedures, and agency data | ✓ | ✓ | | |

| Assessment topic | Data source | | | |
|--|-------------|-----------------------------------|---------------------|---------------------|
| | Documents | Interviews and listening sessions | Direct observations | Administrative data |
| Review of the department's policies and procedures on the use of in-car and body-worn cameras | ✓ | ✓ | | |
| Review of the department's tools for public outreach, gathering of public input, and decision-making based upon information received | ✓ | ✓ | | |
| Assess the department's internal and external complaint process | ✓ | ✓ | ✓ | ✓ |
| Review of all allegations/complaints of racial bias received by NCPD over the past five years and the department's investigation of and response to those complaints | | | | ✓ |
| Review of patterns and trends in citizen and officer complaints, case processing, and outcomes | | | | ✓ |
| Citizen trust and use of the complaint process by different demographics | | ✓ | | |
| Roles, authority, and operational responsibilities throughout the process | ✓ | | | ✓ |
| Policies relating to internal and external procedural justice | ✓ | ✓ | | |
| The department's transparency and communication with all involved parties | | ✓ | | |
| The department's remediation and disciplinary mechanisms | ✓ | ✓ | | ✓ |
| Mechanisms for oversight, accountability, and organizational learning based on external citizen complaints as well as internally reported officer misconduct | ✓ | ✓ | | |
| Assess recruitment, hiring, promotions and personnel practices | ✓ | ✓ | ✓ | ✓ |
| Policies, procedures, training, hiring standards, practices, and protocols | ✓ | | | |
| Community engagement in the development of strategies in the recruitment and hiring process that will lead to a diverse workforce, including SROs | ✓ | ✓ | | ✓ |
| Patterns and trends in diversity across units and ranks | | | | ✓ |
| Promotional policies, procedures, and practices | ✓ | ✓ | | ✓ |
| Internal procedural justice (particularly internal officer complaints) | ✓ | ✓ | | |
| Communication protocols and practices | ✓ | ✓ | | |

Document collection and review

CNA will work with North Charleston to identify the official documents relevant to the topic of the evaluation. These documents typically come from various divisions within the agency and in various forms (e.g., policies, general orders and directives, standard operating procedures, specialized section manuals, bulletins, local ordinances, body-worn camera (BWC) video, and training lesson plans). CNA will review and summarize these documents, identifying key elements that relate to the assessment focus. For example, an assessment of current practices in a law enforcement agency would involve a review of all current departmental policy and procedures,

pre-service and in-service lesson plans involving de-escalation, crisis intervention training, training requirements, use of force policies, and (possibly) officer training records.

Policy and procedures: CNA also conducts comprehensive assessment and content analysis to determine whether written policies and procedures are consistent with national standards, such as those established by the International Association of Chiefs of Police or the Commission on Accreditation for Law Enforcement Agencies (CALEA), and with the best practices we have identified in our work with police departments nationwide and with neighboring jurisdictions. We will also consider compliance with local and state legislation, particularly new bills related to police reform. Our comprehensive approach to policy review and gap analysis provides agencies with the support necessary to identify and implement sustainable changes for the police department, as well as to maintain current best practices.

For this aspect of the review, we will focus on identifying policies and procedures that contribute to or increase the likelihood of racial profiling, racial bias, and implicit bias. In our review, the team will examine policies and procedures to determine whether they may inadvertently result in disparate outcomes for minority members of the community. In our experience, agencies may unintentionally implement policies and operational procedures, such as mandatory actions in particular traffic/pedestrian stops or policies for suspect identification that result in disparate outcomes for some community members. An outside review from an organization such as CNA can help agencies take a fresh look at these policies/procedures and their effects in the community.

The review team will also review policies specific to community policing topics and engagement, non-traditional policing strategies, neighborhood officer programs, use of in-car and body-worn cameras, internal affairs complaints/officer discipline (including citizen complaints and the process therein), recruiting, hiring, assignments, and promotions. Again, we will use our policy review as a baseline to understand NCPD's policy approach to these topics and then further understand the practice and community experience compared with policy and other written documentation. We will review policies on racial and implicit bias training. We will compare training policies with actual implementation (i.e., whether officers are generally compliant with policy requirements with respect to retraining and recertification) and with best practices from neighboring jurisdictions and nationally. We will also make note of any gaps in training currently offered to officers compared with best practices and national standards, as well as training implementation in similar agencies.

Training Documentation: CNA will review training documentation during this portion of the analysis, including training records, training curriculum when available, officer interviews, and feedback and other evaluation tools used during training. We will pay special attention to training related to racial bias, use of force, firearms, less-lethal weapons, crisis intervention, de-escalation, vehicle pursuits, community policing, and defensive tactics. Our training review will compare NCPD's training with national best practices, including accreditation standards, as well as relevant

POST standards and other requirements. We will also review, if available, training records to see if any deficiencies remain unaddressed in individual officer training. To the degree it is possible, we will cross-check these findings with discipline and complaint findings.

Related to the policy and training reviews, we will also assess transparency, communication, and engagement, both internally and externally, for all aspects of these topics. We will evaluate the department's current level of transparency with data and information sharing with the community, in part through a review of the NCPD website as well as public notices and information releases from the department. We will review formal policies and protocols for information release and information sharing with the public. We will also, particularly for community-oriented policing policy and practice, assess the department's use of and commitment to participatory processes to engage the community and external procedural justice (e.g., community involvement in recruitment and hiring to lead to a diverse workforce, including SROs). During this we will also assess oversight and accountability methods associated with each aspect of policy and with specific processes such as assessment of use of force incidents, response to complaints, internal affairs, BWC video release, remediation and disciplinary mechanisms, officer misconduct, and others. We will also assess internal transparency and procedural justice, particularly as it relates to investigations and complaints, roles and authorities, and how communication is handled internally. The concepts of internal and external procedural justice and fair and impartial policing will be a major focus of this element of the review.

Investigations documentation: We will request a sample of complete investigation and analysis packages for a select number of critical incident reviews, internal affairs investigations, and use-of-force incidents. We will work with NCPD and the community to identify incidents that especially warrant additional assessment and review, due to complexity, controversy, specific outcomes, or aspects of the internal investigation that were unique or unusual. Our team will do a thorough review of these incidents. Our intention is not to re-investigate the incidents, but rather to review the process of the investigations and to make note of investigatory best practices that NCPD could implement to improve its outcomes and have more credibility with community members. This will allow us to develop recommendations on incident review processes and mechanisms for oversight, accountability, and organizational learning.

Interviews and analysis

CNA will obtain direct input from city officials, NCPD, and community through two interview activities: (1) individual interviews and (2) listening sessions.

Individual interviews: CNA conducts semi-structured interviews to develop an understanding of formal policies and procedures, as well as insights into agency culture and community concerns. Our team has extensive experience conducting interviews regarding public safety, police partnerships with the community, and local government. The interviews provide a source of qualitative data in our assessment of policing practices, culture, leadership, and community policing approaches. Interviews help us get to the ground truth. Simply reading the

department's training requirements does not provide a comprehensive view of the agency's culture and unique dynamics. CNA usually conducts interviews with a diverse set of the department's personnel—from law enforcement executives to line officers and civilian staff. Such interviews will be conducted via phone, virtual platforms, and, where appropriate, in person during site visits. We will specifically include a subsample of SROs in the interview data to provide insight on their interactions with students in schools. As appropriate, we will also interview other community stakeholders—such as governmental staff, local advocacy groups and non-governmental organization members, and community members—to understand their concerns and perspectives. Depending on the number of stakeholders, CNA is also accustomed to conducting focus groups, holding group interviews, and facilitating community meetings to gather this input. All interviews are anonymized and semi-structured, allowing for digressions as appropriate.

Listening sessions: Listening sessions with community members—as well as interviews with external stakeholders, such as local advocacy groups and interest groups—will help us understand policies that contribute to an increase in the likelihood of racial profiling, racial bias, and implicit bias. Community members are often well informed about the policies of their local law enforcement agency. Based on their direct experiences interacting with officers and the agency, they can provide insight into how these policies may inadvertently result in disparate outcomes. Advocacy and interest groups frequently compile community experiences that can provide similar insight. The listening sessions will also provide insight on community policing topics and engagement, and on interactions with youth. Community members are the most direct source of information about impressions of agency community outreach and engagement efforts, and CNA will make it a point to collaborate with local advocacy and special interest groups to recruit youth to participate in listening sessions (potentially dedicating a session to youth input) for their perspectives on the department and its interactions with youth.

Direct observation and analysis

CNA directly observes agency operations related to the identified areas of assessment. Observations may include review boards, training sessions, community meetings, community policing events, ride-alongs, or walk-alongs. CNA will select direct observation activities in collaboration with the City and NCPD leadership and other personnel after determining specific focus activities and availability of events for attendance. Direct observations will offer CNA an up-close understanding of operations and community-oriented policing practices. They also allow us to see where operations may diverge from written policies and what factors contribute to the divergence. For instance, in our review of officer-involved shootings (OISs) in LVMPD, CNA learned, through direct observation of training, that the training staff had been dismissive of certain components of the use-of-force policy. During the same engagement, direct observation of use-of-force review boards led CNA to conclude that presentations and questions posed by commissioned members were not always objective. During the COVID-19 public health crisis, CNA will determine if direct observations are feasible and safe to implement and will discuss alternative approaches if necessary.

Administrative data and analysis

CNA will request administrative data (e.g., crime data, and incident data) from the City and NCPD to support statistical analysis. Following preliminary discussions with the NCPD to learn what data systems are in use, we will request administrative data, such as data from the records management system and other administrative databases. By collecting these data, we will not only develop departmental statistics and time trends but also evaluate the suitability of data collection mechanisms and data collection systems. In similar assessment projects of racial bias, CNA has collated data from departmental databases related to traffic and pedestrian stops, citizens' complaints, recruitment and hiring, use of force, citations, computer-aided dispatch, technological needs, and so on. We have experience working with both vendor-provided data systems and in-house data systems. In past assessments conducted for such agencies as the Philadelphia Police Department, LVMPD, Fayetteville Police Department, and Charleston Police Department, CNA also provided recommendations for improving data systems and processes to ensure that agencies comply with national standards and are able to conduct independent analyses in the future. We use administrative data to conduct quantitative analysis to understand such things as disparities in law enforcement actions experienced by community members by race.

The administrative data component of the assessment will provide critical quantitative insight regarding patterns and practices related to police interactions with the public in all scenarios, including investigative stops, motor vehicle stops, searches, arrests, use of de-escalation tactics, and use-of-force incidents. In the following subsections, we describe the specific statistical techniques we typically use to examine patterns and practices using administrative data on a variety of topics.

Analysis of police-community interactions and NCPD deployments. CNA will analyze data from field contacts, traffic and pedestrian stops, and investigatory stops over a five-year period. This analysis, though fundamentally descriptive, will help North Charleston understand patterns and trends in officer behavior during interactions with community members and uncover evidence of biased actions.

CNA will request five years of administrative data covering each of the data types above. In our team's experience, the variables necessary to conduct analyses of these data, and specifically analyses related to biased activity, are present in administrative data without the need to code any narrative content. While conducting the analyses, CNA notes any recommendations for improving data structure or coding practices to submit to NCPD for consideration.

For each type of interaction cited above, we will analyze the data descriptively in order to establish trends within the interactions, over time and geography, and by community member and officer demographics. These analyses describe the "who, what, when, where, and how" of these interactions and identify trends and notable descriptive differences that warrant further exploration with statistical analysis. CNA will conduct bivariate and multivariate statistical analyses to identify significant differences in the characteristics of these interactions when considering characteristics

of the community member or officer (or both taken together), particularly the race of the involved individuals. For traffic and pedestrian stops, CNA will specifically consider the likelihood of the officer conducting a search, and subsequently, considers the probability of a “hit” during the search, contingent on the race of the community member. Similarly, we analyze citation rates vs. warnings and arrests, contingent on the race of the community member.

For each of the above interactions, we will also create a subset of the data that includes only youth interactions and will conduct similar analyses specifically on those data to understand how trends in interactions with youth may differ from overall trends in departmental practice. Similarly, we will create subsets that include only in-school interactions, specifically focusing on school resource officers and their interactions with youth in schools. We will describe patterns and trends in youth and SRO interactions with students and in schools.

The precise statistical tests to be employed in these analyses will be determined based on the structure of the data and the findings in the descriptive analysis, but they may also include the following:

- Bivariate (t-test) and multivariate (ANOVA) comparisons of conditional means of the dependent variables from specific incident characteristics, such as community member race or officer race
- Multivariate regression modeling of the conditional contributions of numerous incident factors and variables on the dependent variable of interest
- Propensity score matching or other quasi-experimental analyses intended to uncover causal relationships with a plausible comparison group to estimate effects on the group of interest. For example, all incidents involving African American community members would be matched with the most similar incident that involved a White community member, and the difference in use of force would be analyzed.

Analysis of use of force. CNA will analyze data from use-of-force incidents, including encounters or activities involving injuries to officers or citizens over a five-year period. This analytical review of the context of use of force, while fundamentally descriptive, will provide an agency with a current understanding of the common factors and themes present in its use-of-force incidents (e.g., types of force used, tenure of officer, weapons used by the suspect).

CNA will analyze use-of-force data to identify correlations or patterns of any disproportionate use of force against minorities. Specifically, CNA requests copies of use-of-force incident reports over a five-year period. CNA has the necessary data security resources to handle redacted or unredacted incident reports. We will create a coding scheme based on the data available in the incident reports, including such items as the date and time of the incident, the location of the incident, the demographic characteristics of the officers and community members (i.e., race, ethnicity, age, sex), and key characteristics of the use-of-force action itself (type of force used, level of injury to officer or community member, precipitating incident, suspect status (armed

or not armed, intoxicated, mental health crisis), and incident characteristics based on the narrative). Our team will revise this proposed list based on the information available in the agency use-of-force system, but these variables represent those commonly available from departments for which CNA has conducted analyses. We also specifically review use-of-force data and narratives for evidence regarding the implementation of de-escalation tactics by officers on the scene.

We will analyze the data descriptively to establish trends within the incidents over time and geography and by community member demographics. These analyses will describe the “who, what, when, where, and how” of use-of-force incidents in NCPD and identify trends and notable descriptive differences that warrant further exploration with statistical analysis.

Disproportionality is intrinsically difficult to measure and interpret over time and across contexts. It can be computed in a variety of ways—each with advantages and disadvantages. Disproportionality is often expressed in terms of compound ratios: ratio of the percentage of police interactions with African American or Hispanic individuals involving use of force to the corresponding percentage for White individuals. This can be expressed with the following formula:

$$\frac{\textit{Use of force}_{AA\ or\ H} / \textit{Total interactions}_{AA\ or\ H}}{\textit{Use of force}_W / \textit{Total interactions}_W}$$

This compound ratio provides a clear and compelling interpretation: it measures how much more likely police interactions with African American or Hispanic community members are to result in the use of force compared to interactions with Whites.

However, this sort of metric can mask important findings. For example, let us say that 10 percent of incidents involving African Americans in a hypothetical jurisdiction involved use of force in a given year, while 5 percent of incidents for Whites involved use of force. If, after implementing a set of policy interventions, rates fell to 6 percent and 2 percent, respectively, this would represent major reductions in use of force overall and a greater reduction for African Americans. The risk ratio, however, would increase: incidents would now be three times more likely to result in use of force for African Americans than for Whites.

We therefore use a variety of metrics in our assessment of disproportionality. Risk ratios are a necessary component—partly because their ease of computation and interpretation may make them a focus for reform-minded organizations, and partly because raw disparities between groups matter even when other factors contribute to those disparities. However, we will also consider other measures that can provide nuance and context. These include studying how the use of force varies over time, as in the example above. We will also include regression-based analyses to determine how factors other than racial bias may contribute to disparate impacts; if particular circumstances make the use of force more likely, addressing those circumstances directly will both reduce disproportionality and protect the officers involved.

CNA will conduct bivariate and multivariate statistical analyses to identify significant differences in use of force across different characteristics of the incident, particularly the race of the community members involved in the incident. The dependent variable of interest in most analyses will be the type or highest level of force used. In cases of deadly force, another dependent variable of interest will be the presence of a threat perception failure.¹ The precise statistical tests to be employed in these analyses will be determined based on the structure of the data and the findings in the descriptive analysis, but they may include the same techniques noted above.

Analysis of complaints. CNA will analyze five years of citizen and officer allegation/complaint data (i.e., external and internal complaint data), including case processing and outcomes. These analyses will be descriptive in nature and help agencies understand the patterns and trends in citizen and officer complaints over time and by geography, as well as other variables of interest, such as racial bias. During this portion, we will also assess process and intake of complaints, using input from the policy review, as well as our assessment of complaints using the quantitative data.

CNA uses exploratory quantitative analysis approaches for this aspect of the study since little is known before the fact about the expected findings from citizen and officer complaints. Our team will begin by conducting descriptive analyses of the complaint data, including calculating means and other measures of centrality as well as standard deviations and other measures of variability. We will also calculate these measures over time to explore time trends. Of critical importance, we will consider the complaint remediation and the disciplinary outcomes; these are of particular interest in understanding how complaints are adjudicated and identifying potential sources of disparity.

Next, we will conduct cross-tabulations across different variables of interest, including such demographics as race, age, area of residence, and similar demographics for the subject of the complaint. We consider such factors as complaint type and outcome. When appropriate, we conduct bivariate and multivariate comparisons to establish any statistically significant differences in the complaint process (length) or outcome based on underlying characteristics of the complaint itself or of the complainant or target of the complaint.

CNA will analyze the complaint case process, particularly focused on the timeline of complaints. In our experience, the length of time between the incident and the ultimate adjudication of the complaint has a large effect on the complainant's perception of justice. Analyzing case processing timelines can uncover underlying causes for delays during the process.

¹ A *threat perception failure* is defined as being present in “mistake of fact” shootings, which occur when an officer misperceives a subject as being armed. For example, an officer misperceives a nonthreatening object (such as a cell phone) as a weapon, or the subject moves in a way that is commonly associated with drawing a weapon, such as tugging at a waistband.

CNA couples quantitative analysis with qualitative inquiry during this portion of our review to fully understand the complaint case process.

Analysis of recruiting, hiring, promotions, assignments, and discipline. CNA typically analyzes up to five years of recruitment and hiring data, including applications, candidates, and hiring decisions (as agency’s data systems support). This includes an examination of post-hiring events, such as the completion of recruit training and completion of probationary hiring periods, to examine for bias in officer retention. We will also incorporate census data into this analysis in order to use the underlying demographics of the city as a baseline for comparison. We will also consider the patterns and trends in diversity across different ranks and units.

CNA will begin with basic analyses considering the demographics of five groups: (1) applicants, (2) those applicants considered as candidates (i.e., those who made it past the application stage and moved to the screening phase), (3) those applicants who were extended offers, (4) those applicants hired, and (5) the overall department. We map the demographics of each group over time both descriptively and in comparison, with the demographics of the city (we will use statistical tests on the comparison to identify statistically significant differences). CNA will also consider each of these analyses separately for sworn and unsworn personnel.

Next, if the data permit, CNA will use an ordinal logistic regression to understand the factors that are most closely associated with a specific individual reaching the next stage in the hiring process (i.e., from application to candidacy, from candidacy to job offer, from job offer to acceptance). Ordinal logistic modeling is a technique used to understand the factors that contribute to processes that occur moving in a single direction, such as a hiring process; the outcomes can be ranked in order from first to last or from lowest to highest. CNA will be able to uncover statistical associations between applicant characteristics and their likelihood of moving to the next stage of the application process, holding the effects of all other variables equal. This will allow NCPD to understand what factors are contributing to applicant success, including the effect of the applicant’s race.

To analyze disciplinary outcomes, special assignments, and promotions, CNA develops descriptive statistics and cross-tabulations of discipline and promotion and assignment decisions by officer demographics. We further consider the possibility of disparities in both processes, again using a compound ratio approach. For example, the compound ratio for disciplinary outcomes for men vs. women could be expressed as follows:

$$\frac{\textit{Severe disciplinary outcome}_{\textit{Women}} / \textit{Total disciplinary actions}_{\textit{Women}}}{\textit{Severe disciplinary outcome}_{\textit{Men}} / \textit{Total disciplinary actions}_{\textit{Men}}}$$

This compound ratio has a clear and compelling interpretation: disciplinary actions involving women are N times more likely to result in severe discipline outcomes than those involving men. This is a common approach to identifying disproportionality. We will apply a

similar methodology for understanding promotions. For the ratio analysis, if the data and sample size are sufficient, CNA will conduct subanalyses controlling for the circumstances of the incident or the officers involved. For example, we might consider only officers who were investigated for the same infraction, only officers who have similar tenure in the organization, or only officers who serve in the same assignments (e.g., patrol vs. detectives). These subanalyses can reveal which individuals in the organization may be incurring disproportionate processes or outcomes. As before, compound ratio analysis can mask important findings. We therefore plan to use a variety of metrics in our assessment of disproportionality.

CNA will conduct bivariate and multivariate statistical analyses to identify significant differences in discipline practice across different characteristics of the incident, particularly the race and gender of the officer involved. The dependent variable of interest in most analyses will be the disciplinary outcome, which CNA will categorize into distinct analyzable categories. As noted earlier, the precise statistical tests in these analyses will be determined based on the structure of the data and the findings in the descriptive analysis, and include the same options described previously.

Additional specialized analyses

In light of recent national events, our team will also consider NCPD response to local protests (using each of the data sources listed above), though we will not conduct a complete separate review of the protest response, as in an after-action analysis. We will be specifically interested in community perceptions of the department's response and will conduct a more detailed review of the events using internal reviews and incident timelines. CNA is also a premier provider for formal after-action review and assessment, particularly in law enforcement settings in response to critical events, and can provide a separate scope of work detailing our approach if the City of North Charleston is also interested in a full assessment of protest events.

Task 2: Development of findings, recommendations, and final report

CNA has working knowledge of best practices and innovations in a wide variety of agencies nationwide through our work on such programs as the Justice Reinvestment Initiative (JRI), Strategies for Policing Innovation (SPI), National Public Safety Partnership (PSP), Project Safe Neighborhoods (PSN), the Safer Neighborhoods through Precision Policing Initiative (SNPPI), and the Body-Worn Camera (BWC) Training and Technical Assistance (TTA) program. Many of these programs primarily serve medium-sized departments, such as North Charleston. We also work with more than 450 police agencies to assess, implement, monitor, and evaluate justice system innovations and to develop justice system enhancements. These agencies vary in size, location, proximity to large cities, and crime problems. CNA collates best practices and innovative practices based on our working knowledge of the field as well as through additional research on specialized topics, as needed.

Based on the best practices and findings uncovered from the organizational assessment, CNA will tailor recommendations to the City, NCPD, and community. Recommendations will focus on reforming the agency in a way that meets community expectations and reflects evidence-based practices, professional standards, emerging cutting-edge practices, and tailor-made innovative approaches developed by the CNA team, as demonstrated by the extant research literature, subject matter expert opinions, and findings from the organizational assessment. Note that we will also highlight areas of strength within NCPD and make recommendations for practices that should be sustained or expanded.

We will design recommendations that are actionable and which can successfully institutionalize change, such as incorporating new training practices and strategies, refining programs, instituting new technologies, modifying resources, adjusting oversight, and adding disciplinary and rewards systems to increase accountability. For example, in our interviews with officers from the Spokane Police Department, CNA discovered that many newly assigned sergeants and lieutenants were unsure of their new responsibilities as supervisors. This gap created inconsistencies in personnel management and, ultimately, tension among line officers. CNA recommended that the Spokane Police Department institute training programs specifically geared towards newly assigned supervisors and mentorship programs for officers seeking promotion. The Spokane Police Department established a formal training and mentoring program for supervisors.

A core focus during our development of findings and recommendations will be the oversight and accountability mechanisms in place in all of the topic areas described earlier. We will carefully document these mechanisms during our review of policy and practice, and from information gathered during interviews. Oversight and accountability practices are critical to successful implementation of reform efforts, and to building trust with the community. Therefore, this will be a cross-cutting point of analysis and theme in the findings and recommendations.

CNA understands that assessment recommendations cannot be applied universally to agencies across the country. What works well in one agency may not be suitable for another. Variances in agency demographics, community characteristics and expectations, departmental culture, and technological capacity have significant effects on the extent to which an agency is able to influence change. CNA is committed to working closely with NCPD and the community as it develops its recommendations to ensure that the recommendations are actionable and will be sustained beyond CNA's engagement.

At the completion of the assessment and after sharing the draft findings and recommendations with local stakeholders, CNA will submit a detailed final report and Executive Summary to the relevant local stakeholders in the identified areas of assessment, including identified areas of high performance and recommendations for improvement. CNA will also brief the community and members of the government and law enforcement agency on the report's findings. The presentation of findings by an impartial nonprofit organization committed to operations research supports transparency and community engagement principles, as well as the

promotion of both internal and external procedural justice. We typically allow the community to submit comments on the draft report for a period of two to four weeks before beginning revisions in preparation for the final draft.

Before finalizing the report, CNA will submit it through our rigorous internal quality assurance process. As a nonprofit organization, we focus on quality as the ultimate measure of our success. CNA's mature quality management processes are designed to prevent technical errors and have sufficient flexibility to meet the client's specific requirements. We also engage in a collaborative development process in which we provide our clients numerous opportunities to review findings and recommendations before the completion of reports. In addition, CNA has an established internal peer review process in which all deliverables are reviewed by experts who were not involved in the report development process to ensure that they meet the highest quality standards for research methodology and presentation of findings. CNA also has a cadre of expert editors who strive to ensure that all deliverables are error free and adhere to stylistic standards that include clarity and readability.

After delivering the final report to the city of North Charleston, CNA personnel will provide public briefings on the final report in open community forums, facilitated by our staff, to promote dialogue and accountability about the report. We encourage agencies to establish public-facing status boards on the findings and recommendations in the report, which is regularly updated with progress. Agencies may also benefit from monitoring by an organization like CNA to ensure faithful and complete execution of all recommendations and to promote trust in the community.

Task 3: Implementation support

CNA has substantial experience working with local agencies to implement organizational change and reform. During our work on the COPS Office Collaborative Reform Initiative, we engaged in a 12-month assessment period followed by 6 to 18 months of monitoring and support during implementation. For this engagement, we suggest a 12-month follow-up, during which time our team would engage with the City and NCPD at a lower level of effort while maintaining regular contact and monitoring of implementation of our recommendations. We would hold monthly calls, in addition to ad hoc contacts as needed to evaluate NCPD progress. During this time, we will provide two key services: support for implementation and monitoring of implementation.

Sample recommendations from past CNA work

“Charleston Police Department should establish a formal compliance and auditing process to ensure that officers comply with the BWC policy and properly tag BWC videos.”

“Spokane Police Department should develop a data collection and evaluation capacity for training conducted in the department.”

“In addition to community watch meetings, Fayetteville Police Department should engage in regularly scheduled community trust-building activities, such as ‘Coffee with a Cop.’”

We will assist NCPD in the implementation of our recommendations from the audit. CNA supports over half a dozen national programs to assist law enforcement agencies, and we work with over 450 agencies nationally that can serve as peer learning resources for the department. We have broad knowledge of federally available resources to assist agencies, often available at no cost to local jurisdictions. We are also connected with premier training organizations and law enforcement experts covering hundreds of topics and areas of expertise. We can help NCPD connect with needed assistance on topics ranging from de-escalation training to grants development to implicit bias training to expert policy development and more.

We will monitor NCPD’s progress on implementing the recommendations made as part of the audit. To do this, we will develop a tracking system that denotes which recommendations are complete, in progress, or not started, and which may have been deemed impossible or infeasible after further review. We will review evidence of implementation, such as implementation of new training, revisions to policy, and changes to data systems. Our team will provide a final determination for when recommendations have been fully implemented. We will provide regular updates to the City and community on NCPD’s progress. These updates will include highlights of NCPD’s successes. We will conclude the monitoring portion by developing a final summary report that describes NCPD’s progress across all recommendations, as well as next steps and remaining goals.

3. Timeline and pricing information

Proposed timeline

Table 2. Proposed timeline

| Major task | Subtasks | Completion date |
|--|---|-------------------------|
| Data collection and analysis | Conduct initial audit meeting with North Charleston points of contact | Within 1 week of award |
| | Produce initial data request (documents, administrative data, interview scheduling) | Within 2 weeks of award |
| | Conduct policy review | Months 2–3 |
| | Analyze administrative data | Months 2–3 |
| | Hold interviews | Months 2–3 |
| | Develop analysis across all data sources | End of Month 3 |
| Development of findings, recommendations, and report | Draft preliminary findings | Month 4 |
| | Draft preliminary recommendations | Month 4 |
| | Preliminary report internal review and editing | Month 4 |
| | Deliver preliminary written report | End of Month 4 |
| | Compile feedback from preliminary report | Month 5 |
| | Conduct additional data collection and analysis, as needed | Month 5 |
| | Revise findings, analysis, and recommendations | Month 5 |
| | Final report internal review, editing, and formatting | Month 5 |
| Deliver final written report | End of Month 5 | |

| Major task | Subtasks | Completion date |
|------------------------|---|-----------------|
| | Virtual or in-person presentation to City, NCPD, and community | Month 6 |
| Implementation support | Ongoing monitoring of recommendation implementation | Months 7–16 |
| | Technical assistance as requested | Months 7–16 |
| | Final assessment and analysis of recommendation implementation | Month 17 |
| | Develop final implementation status report | Month 18 |
| | Presentation of final implementation status | Month 18 |

Audit budget



Response to North Charleston Racial Bias Audit
 Submission Date: Sept 4, 2020
 Period of Performance: 6 months from award date

| Item No. | Name | Rate | Hours | Cost | | |
|----------|--|-------------|---------------------|----------------------|---------------------|----------------------|
| 1. | Zoë Thorkildsen | \$213.12 | 300.0 | \$ 63,935.36 | | |
| | Bridgette Bryson | \$ 86.84 | 250.0 | \$ 21,710.29 | | |
| | Emma Wohl | \$ 70.23 | 250.0 | \$ 17,556.73 | | |
| | Sarah Lysaker | \$140.30 | 40.0 | \$ 5,612.16 | | |
| | Subtotal Labor | | | \$ 108,814.54 | | |
| 2. | ODC | | | | | |
| | Steve Rickman - SER | \$124.51 | 275 | \$ 34,239.05 | | |
| | Rodney Monroe | \$153.29 | 275 | \$ 42,155.18 | | |
| | Subtotal Consultant/Subk Labor | | | \$ 76,394.23 | | |
| | Travel | Rate | No. of Peopl | No. of Days | No. of Trips | Cost |
| | Airfare from DCA to N. Charleston, SC | \$333.24 | 1 | | 3 | \$ 999.73 |
| | N. Charleston, SC Lodging | \$238.60 | 1 | 2 | 3 | \$ 1,431.61 |
| | N. Charleston, SC M&IE | \$ 94.64 | 1 | 2.5 | 3 | \$ 709.81 |
| | Subtotal Travel | | | | | \$ 3,141.14 |
| | Subtotal ODC (Consultant/Subk/Travel) | | | | | \$ 79,535.37 |
| 3. | Total Cost | | | | | \$ 188,349.91 |

Implementation support budget



Response to North Charleston Racial Bias Audit
 Submission Date: Sept 4, 2020
 Period of Performance: 12 months following conclusion of assessment

| Item No. | Name | Rate | Hours | Cost | | |
|----------|--|-------------|---------------------|---------------------|---------------------|---------------------|
| 1. | Zoë Thorkildsen | \$213.12 | 175.0 | \$ 37,295.63 | | |
| | Bridgette Bryson | \$ 86.84 | 150.0 | \$ 13,026.17 | | |
| | Sarah Lysaker | \$140.30 | 40.0 | \$ 5,612.16 | | |
| | Subtotal Labor | | | \$ 55,933.96 | | |
| 2. | <u>ODC</u> | | | | | |
| | Steve Rickman - SER | \$124.51 | 125 | \$ 15,563.21 | | |
| | Rodney Monroe | \$153.29 | 125 | \$ 19,161.44 | | |
| | Subtotal Consultant/Subk Labor | | | \$ 34,724.65 | | |
| | <u>Travel</u> | <u>Rate</u> | <u>No. of Peopl</u> | <u>No. of Days</u> | <u>No. of Trips</u> | <u>Cost</u> |
| | Airfare from DCA to N. Charleston, SC | \$333.24 | 1 | | 4 | \$ 1,332.97 |
| | N. Charleston, SC Lodging | \$238.60 | 1 | 2 | 4 | \$ 1,908.81 |
| | N. Charleston, SC M&IE | \$ 94.64 | 1 | 2.5 | 4 | \$ 946.41 |
| | Subtotal Travel | | | | | \$ 4,188.19 |
| | Subtotal ODC (Consultant/Subk/Travel) | | | | | \$ 38,912.84 |
| 3. | <u>Total Cost</u> | | | | | \$ 94,846.80 |

4. Proposed team

Ms. Zoë Thorkildsen, project director, is an expert in local assessment and reform, including statistical methods for analyzing racial disparities in law enforcement actions. She is the project director for the Maricopa County, Arizona, Sheriff’s Office (MCSO) traffic stop analysis project. She leads the development of analytical methodology and offers analytical guidance to identify disparities in traffic stop patterns and outcomes. Ms. Thorkildsen also led the quantitative analysis for a racial bias audit performed for the Charleston Police Department racial bias audit, which aimed to uncover disparate behavior related to race. She also supported analysis of policies and data systems during the Charleston racial bias audit. She has conducted extensive analysis of law enforcement data, including analyzing investigative stops, motor vehicle stops, searches, arrests, use of de-escalation tactics, use-of-force incidents, internal and external complaints, discipline findings, and recruitment and hiring. She has considerable experience working with law enforcement agencies



and other criminal justice stakeholders for both research and training and technical assistance purposes through her work on, for example, the Collaborative Reform Initiative (where she supported policy and practice reviews for the Fayetteville, Spokane, Las Vegas, and Philadelphia efforts), the Public Safety Partnership (PSP) (where she leads assessment, accountability, and sustainability planning), and the Strategies for Policing Innovation program. She is pursuing a PhD in public policy and public administration from the George Washington University.

Chief Rodney Monroe has over 38 years of law enforcement experience, 15 of which were as chief of police in several major cities, including Macon, Georgia; Richmond, Virginia; and Charlotte, North Carolina. Chief Monroe was a seasoned manager at the senior executive level in the District of Columbia Metropolitan Police Department, from which he retired as assistant chief after 22 years of service. In addition to his law enforcement experience, he spent time on the North Charleston Collaborative Reform, Minneapolis Critical Incident Review, and Independent Monitor in the Southern District of Mississippi. Chief Monroe currently provides support for the Bureau of Justice Assistance (BJA) National Public Safety Partnership (PSP), for the Safer Neighborhoods through Precision Policing Initiative (SNPPI) Training and Technical Assistance (TTA) program, for the Charleston Racial Bias Analysis Audit, and as deputy monitor for the Chicago Police Department Independent Monitoring Team. He has extensive experience in organizing communities and developing meaningful partnerships with residents, businesses, and faith-based organizations with a goal of increasing trust, respect, and legitimacy among police and citizens while reducing crime and improving the quality of life.



Mr. Steve Rickman is a law enforcement expert who brings extensive experience in police reform, community engagement, crowd control, and security measures, and who has participated in similar reviews. Mr. Rickman served as an expert for the planning and after-action analysis of the 2012 Presidential Nominating conventions. He is co-author of a groundbreaking report on police shootings in Las Vegas, Nevada, that provided a series of recommendations to address issues concerning fair and impartial policing and excessive use of force by police agencies. Mr.



Rickman brings an exceptional record of hands-on experience in the management and direction of programs and projects in support of government operations at all levels. Mr. Rickman currently works as an associate monitor for community policing for the Albuquerque, New Mexico, and Chicago, Illinois, police department consent decrees and as a Department of Justice (DOJ) subject matter expert for the BJA Body-Worn Camera TTA program. His public service portfolio also includes directing the Washington, DC, Criminal Justice Statistics Analysis Center and serving in the following roles: president of the Justice Research Statistics Association; director of the Washington, DC, Homeland Security and Emergency Management Agency; division director for

the DOJ BJA; readiness director for the White House Office of Homeland Security (Detail from DOJ); and technical advisor on the Task Force for 21st Century Policing.

Ms. Bridgette Bryson will serve as a project analyst. Ms. Bryson is experienced in conducting quantitative and qualitative analysis and working alongside law enforcement agencies to support their operations. She serves as deputy project director for the MCSO traffic stop analysis, for which she analyzes traffic stop patterns and outcomes on an annual basis. Ms. Bryson assisted in the development of analytic methodology to identify trends in stop patterns, while recommending variables that the department should capture. In addition, she developed quarterly reports that provide findings and recommendations for MCSO's body-worn camera supervisory review process, as well as the review process for MCSO's traffic stop contact forms. For the Bureau of Justice Assistance (BJA) PSP, Ms. Bryson supports two cities as an analyst, providing targeted support and evaluation of their organizational processes, and she leads the accountability efforts for these sites. She serves both as an analyst for two Strategies for Policing Innovation (SPI) sites and as the Outreach Coordinator for all SPI sites. As an analyst, she supports CNA's work with BJA using analytics to improve officer safety. Ms. Bryson previously supported a Project Safe Neighborhoods district as an analyst in the Mid-Atlantic area, and she served as an analyst researching law enforcement's use of common operational picture technology, conducting site visits and authoring the case study for the client.



Ms. Emma Wohl (CNA) will serve as a project analyst. Ms. Wohl has experience working alongside law enforcement agencies to help coordinate and deliver TTA. She previously served as the project manager and analyst for the Maricopa County Traffic Stop Analysis project analyzing disparities in traffic stop patterns and outcomes. Ms. Wohl has conducted data collection and analysis for two National Institute of Justice projects on safety equipment use by correctional officers and law enforcement use of common operational picture technology. She has also served as an analyst on several projects delivering technical assistance to local law enforcement agencies for the reduction in violent crime, including BJA PSP program and the Strategies for Policing Innovation program. For these projects, she provides analytical and technical support to project sites and assists with the development and distribution of public-facing resources.



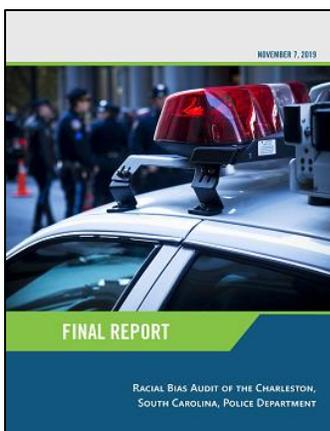
5. Qualifications

Charleston, South Carolina, racial bias audit

In 2019, CNA conducted a racial bias audit of the Charleston, South Carolina, Police Department. Our team worked closely with the department and community to assess, monitor, and assist the Charleston Police Department in uncovering any aspects of implicit bias or systemic and individual racial bias through review and analysis of traffic stops (including searches, arrests, and citations), use of force, complaints, community-oriented policing, and recruitment and hiring. The team implemented document reviews, interviews, community meetings, and data analysis and developed a report that includes 48 findings and associated recommendations. The team provided recommendations for reforms aimed at improving community-oriented policing practices, transparency, professionalism, accountability, community inclusion, fairness, effectiveness, and public trust. In support of this work, the team reviewed all departmental policies and general orders, conducted 87 interviews with departmental personnel and community stakeholders, held six community meetings involving over 290 community members, and analyzed five administrative datasets. The purpose of the interviews with the community was to gain a better understanding of Charleston Police Department’s policies, training, and operations in relation to racial disparity in use of force,

Regarding CNA's work in Charleston, Judge Arthur C. McFarland noted:

“The bottom line is that in this instance I believe that **we had the right firm for this job**. The diversity of the staff, the expertise and the experience that they brought to the table, I think really made the difference in the outcome of this audit.”

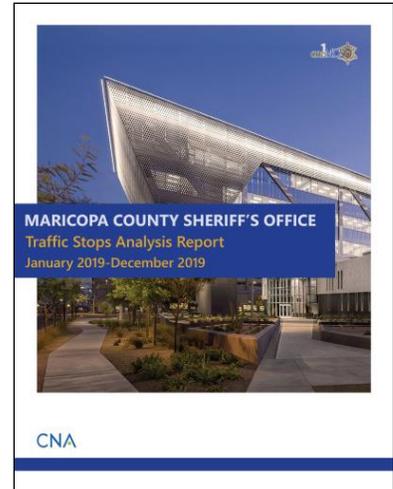


traffic stops, complaints, recruitment and hiring, and interactions with community members. As part of this project, the CNA team built consensus among law enforcement, city, and community stakeholders for a series of recommended improvements in policing operations. CNA personnel presented findings from the audit to the Charleston City Council and to the community in a series of three community meetings. The Charleston Police Department established a tracking system to respond to the recommendations in the report. As of December 2019, all recommendations had been assigned to specific personnel and characterized by the anticipated timeline for implementation.

Maricopa County Sheriff’s Office traffic stop analysis

Since 2018, CNA has supported the Maricopa County, Arizona, Sheriff’s Office (MCSO) in analyzing its traffic stop activity. CNA assists MCSO by conducting an annual analysis of its traffic stop activity with the goal of uncovering evidence of potential bias. The first annual report developed and written by CNA was released in September 2019, and MCSO released the second

CNA report in May 2020. CNA’s project director, Zoë Thorkildsen, presented findings from the 2019 annual report to office personnel and the community; the community presentation can be found on MCSO’s Facebook page. CNA conducted statistical analysis of traffic stop activity within MCSO using the quasi-experimental statistical technique of propensity score matching, an emerging best practice approach to understanding racial disparity in law enforcement activity. CNA analyzed stop outcomes, including stop length, citations, arrests, searches, and seizure rates during searches across race of the driver. CNA recently produced a quarterly report including findings and recommendations to improve the consistency of supervisory review of traffic stop body-worn camera



footage. To develop this report, CNA personnel observed supervisors conducting reviews and interviewed them about their review processes. CNA will also support additional quarterly reports and monthly analyses related to traffic stops in MCSO, including reviews of policies and procedures related to traffic stop data collection and auditing and reviews. In this project, CNA supports MCSO under the auspices of a court-ordered monitoring arrangement, managing demands from multiple stakeholders simultaneously. **As a result of CNA’s support to MCSO on the development and publication of the annual report, MCSO has achieved compliance with the relevant paragraph for the first time since the court order was enacted.**

Consent decree monitoring support

CNA, in partnership with Schiff Hardin LLP, serves on the Independent Monitoring Team for the City of Chicago’s consent decree. Team members collect and analyze data to determine the Chicago Police Department’s compliance with consent decree requirements in 10 topic areas: community policing; impartial policing; crisis intervention; use of force; recruitment, hiring, and promotion; training; supervision; officer wellness and support; accountability and transparency; and data collection, analysis, and management. Our team bases its evaluations of compliance on multiple data sources, triangulating them when possible. Sources include documents, datasets, interviews, curricula, and roundtables with community members.

CNA participates on the Independent Monitoring Team for the City of Albuquerque, in partnership with Public Management Resources. CNA’s work focuses on assessing the Albuquerque Police Department’s (APD’s) requirements regarding crisis intervention. Our team reviews documents and data, reviews and approves policies and curricula, observes training, participates in ride-alongs, and listens to community members who share their experiences with APD. CNA personnel focus extensively on community engagement, including the facilitation of listening sessions with the community, and on crisis intervention training and policies.

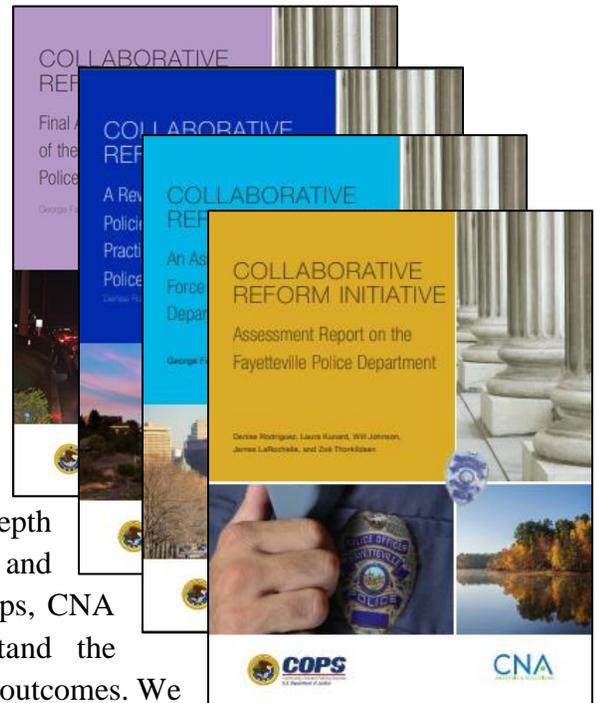
Collaborative Reform Initiative

CNA was the inaugural training and technical assistance provider for the Office of Community Oriented Policing Services Collaborative Reform Initiative. We worked intensively with the following four communities and law enforcement agencies on understanding racial disparities in law enforcement activities and implementing and sustaining reform: Fayetteville, North Carolina; Las Vegas, Nevada; Philadelphia, Pennsylvania; and Spokane, Washington. As an example, CNA's assessment of the Las Vegas Metropolitan Police Department (LVMPD) produced 75 findings and recommendations, many of which focused on the department's training on use of force, oversight mechanisms, use-of-force policy, and community outreach. For one year after the completion of this assessment, we monitored the department's implementation of the recommendations and provided technical assistance as needed. The outcomes achieved from the department's implementation of our recommendations are impressive. We also find the following features noteworthy:

Police accountability expert and University of Nebraska professor emeritus Samuel Walker stated that the work in Las Vegas is a "good measuring rod for...use of force policies," adding that "**people ought to look at this report and learn from it.**" (*Las Vegas Review Journal*. November 18, 2012)

- The reforms recommended and implemented in Las Vegas have demonstrated incredible staying power—sustainability—because of CNA's focus on policies, procedures, practices, and training, particularly LVMPD's implementation of reality-based training (RBT) for police-citizen encounters, use-of-force scenarios, and high-stress situations. The RBT in Las Vegas is being replicated by other agencies seeking to benefit from the lessons learned from LVMPD and the independent analysis by CNA.
- LVMPD's implementation of the recommended reforms has given priority attention to community policing and to community involvement in LVMPD, amounting to a total revamping of the department's internal accountability reviews of use-of-force incidents. LVMPD gives community representatives shared responsibility and power in the review of use-of-force incidents. This is a forward-thinking and open approach to community policing.

In Spokane, we assessed the department’s policies and procedures related to use of force—including training, investigations, and internal and external oversight processes—and community outreach, producing 42 findings and recommendations. In Philadelphia, CNA conducted a comprehensive examination of over 390 officer-involved shooting incidents, specifically analyzing the time and location of OISS, the individuals involved (officers and suspects), and the dynamics of the encounters. CNA also examined the issues of racial bias and threat perception, examining these factors independently and together. After a 12-month assessment, CNA delivered 48 findings and 91 recommendations. In Fayetteville, CNA conducted an in-depth analysis of the Fayetteville Police Department’s traffic stops and field-initiated contacts. In analyzing over 68,000 traffic stops, CNA conducted a series of descriptive analyses to understand the relationship between citizen race and traffic stop reasons and outcomes. We compared the races of drivers across different reasons for traffic stops. We also compared the likelihood, based on the driver’s race, of a stop resulting in a search and the relative likelihood, again based on the driver’s race, of the driver receiving a citation rather than a warning.



In addition to our specific experience assisting law enforcement agencies with reform, CNA leads, partners, and guides numerous agencies nationwide in implementing 21st century policing principles and best practices daily. We achieve this through our expert consulting services to agencies through Department of Justice (DOJ) initiatives, such as the Safer Neighborhoods through Precision Policing Initiative (SNPPI), Justice Reinvestment Initiative (JRI), Strategies for Policing Innovation (SPI), National Public Safety Partnership (PSP), Project Safe Neighborhoods (PSN), and the Body-Worn Camera (BWC) Training and Technical Assistance (TTA) program. Our broad, nationwide reach to hundreds of agencies ensures that we are aware of the best emerging practices in law enforcement and in a position to recommend tested, practical changes to support community and law enforcement collaboration and success.