

Draft Strategic Plan 2019-2020

Saint Paul Police Civilian Internal Affairs Review Commission

Recommendations Submitted for Consideration by the HREEO Department and Mayor Melvin Carter:

This document summarizes the discussions, considerations and decisions of the Saint Paul Police Civilian Internal Affairs Review Commission from their strategic planning meeting on September 15, 2018. It contains the PCIARC's plans and action steps for fiscal years 2019-2020.

Executive Summary of The PCIARC Draft Strategic Plan 2019-2020

Introduction

The following is an Executive Summary of the 2019 -2020 draft strategic plan for the Saint Paul Police Civilian Internal Affairs Review Commission (hereinafter "the PCIARC" or "the Commission"). This draft plan was developed as a road map for the omission in carrying out its mandate over the next two fiscal years. It captures the discussions, conclusions and decisions reached by the Commission during a strategic planning session held on September 15, 2018. This Plan will be revised by the PCIARC as circumstances and the passage of time dictate.

Purpose and Mandate

The PCIARC's role is to provide a community voice in decisions about complaints against Saint Paul Police officers. The PCIARC's goal is to instill faith in the community that "police services are delivered in a lawful and nondiscriminatory manner." In doing so, the PCIARC also hopes to make Saint Paul a model of police civilian oversight and collaboration between civilian oversight agencies and police departments. Each of the six areas identified in this draft strategic plan contain ambitious action steps designed to help the Commission meet those goals. Many of these steps require support from the Mayor's Office, City Council, the City Attorney's Office, and the Saint Paul Police Department (hereinafter "the Police Department").

Background

The PCIARC met on September 15, 2018 for a Strategic Planning session to discuss its progress over the past 11 months and to lay out its priorities for the coming year(s).

In developing the PCIARC Draft strategic plan, Commission members: discussed their functioning and progress since their first case review meeting (October 2017), reviewed requirements under the 2001 NAACP Agreement with the Saint Paul Police Department

(hereinafter “NAACP Agreement”) , reviewed the recommendations of the 2015 Audit of the PCIARC by the University of Minnesota (hereinafter “2015 Audit of the PCIARC”), discussed the current functioning of case intake and review and the concern about having complete data sets, and considered comments from the Saint Paul community, including members of the Saint Paul Police Department.

Executive Summary of the PCIARC Draft strategic plan

Introduction

The following is an Executive Summary of the Draft strategic plan for the Saint Paul Police Civilian Internal Affairs Review Commission (hereinafter “the PCIARC” or “the Commission”). This Plan was developed as a road map for the Commission in carrying out its mandate over the next several years. It captures the discussions, conclusions and decisions reached by the Commission during a strategic planning session held on September 15, 2018. This Plan will be revised by the PCIARC as circumstances and the passage of time dictate.

Purpose and Mandate

The PCIARC’s role is to provide a community voice in decisions about complaints against Saint Paul Police officers. The PCIARC’s goal is to instill faith in the community that “police services are delivered in a lawful and nondiscriminatory manner.”¹ In doing so, the PCIARC also hopes to make Saint Paul a model of police civilian oversight and collaboration between civilian oversight agencies and police departments. Each of the six areas identified in this draft strategic plan contain ambitious action steps designed to help the Commission meet those goals. Many of these steps require support from the Mayor’s Office, City Council, the City Attorney’s Office, and the Saint Paul Police Department (hereinafter “the Police Department”).

Background

The PCIARC met on September 15, 2018 for a Strategic Planning session to discuss its progress over the past 11 months and to lay out its priorities for the coming year(s).

In developing the PCIARC draft strategic plan, Commission members: discussed their functioning and progress since their first case review meeting (October 2017), reviewed requirements under the 2001 NAACP Agreement with the Saint Paul Police Department (hereinafter “NAACP Agreement”)², reviewed the recommendations of the 2015 Audit of the

¹ City of Saint Paul Code of Ordinances Part III, Title V, Chapter 102, Sec. 102.1(a).

² Agreement Between St. Paul Police Department and St. Paul Chapter of the NAACP, <http://mn-stpaul.civicplus.com/DocumentCenter/Home/View/3584>

PCIARC by the University of Minnesota (hereinafter “2015 Audit of the PCIARC”),³ discussed the current functioning of case intake and review and the concern about having complete data sets, and considered comments from the Saint Paul community, including members of the Saint Paul Police Department.

Executive Summary of the PCIARC Draft Strategic Plan

As a result of input from the community—including police, the NAACP Agreement, the 2015 Audit of the PCIARC, as well as its own observations, experience, discussions and conclusions, the Commission made decisions to take action in six areas of their work: Case Intake and Review, Community Outreach Efforts (including educational presentations, attendance at community events, and marketing of PCIARC), Policy Review and Recommendations, Community Meetings and Input, On-going Training for Commissioners (both mandatory and development opportunities), and Outreach to Other Organizations.

Case Intake and Review:

The PCIARC is concerned that it is not receiving a full accounting of all civilian-initiated complaints. Part of this concern can be attributed to differing interpretations by the Police Department and PCIARC/Human Rights of the somewhat ambiguous wording of the PCIARC’s enabling ordinance (hereinafter “PCIARC Ordinance”).

The PCIARC needs support from the Mayor’s Office and the City Attorney’s Office, and collaboration from the Police Department, in order to be certain that it is reviewing all complaints within its purview, and receiving a full accounting of complaints filed with the Police Department.

The PCIARC needs support from the Mayor’s Office, the City Attorney’s Office, and City Council, and collaboration from the Police Department, in order to have input on all use-of-force incidents resulting in serious bodily injury or property damage.

The current process for civilians to file a complaint makes it difficult to ensure that all complaints are being properly accounted for; this may require involvement by the Mayor’s Office, and possibly by the City Attorney’s Office, City Council, and the NAACP of Saint Paul, as well as collaboration from the Police Department.

³ Report of the Audit of the St. Paul Police Civilian Internal Affairs Review Commission
<https://www.stpaul.gov/DocumentCenter/View/81444.pdf>

Proposed Actions for Case Intake and Review:

1. Clarify the correct interpretation of the PCIARC Ordinance with the Mayor's Office, City Attorney's Office, and Police Department so that the PCIARC is assured of being informed of all civilian initiated complaints (not just those investigated) regarding allegations of excessive use of force, inappropriate use of firearms, discrimination (as defined by City Code of Ordinance, Chapter 183), racial profiling, and poor public relations. As noted earlier in this document, there is concern that the PCIARC is not being apprised of all such complaints as a result of the Police Department's interpretation of the PCIARC ordinance.⁴
2. Amend the PCIARC Ordinance so that the PCIARC is assured of being referred all use of force incidents resulting in personal injury or property damage (not solely those incidents initiated by civilian complaints). This practice is in keeping with the spirit of the NAACP Agreement and the PCIARC Ordinance.
3. Clarify with the Mayor's Office and Police Department how complaints are to be filed and tracked.
 - a. If they continue to be filed with the Police Department, the PCIARC will work with the Police Department to develop a clear procedure so that the PCIARC is always apprised of the complaint, regardless of whether an investigation is subsequently initiated
 - b. If necessary, make changes to the PCIARC-related information on the current business cards that officers are given to hand out⁵
 - c. Train officers to understand the PCIARC's role in the complaint, disciplinary and policy recommendation process.
4. Create a complete taxonomy of complaint data sets, including all complaints initiated by Police Department's Internal Affairs unit, complaints handled by Human Rights that were never brought to the PCIARC, Complaints gathered from the Police Department's Community Feedback online form, and other sources in which civilian feedback may be collected.

⁴ See *PCIARC Mandate*, subdivision b., page 10 of this document.

⁵ A subsequent check of the PCIARC-related information on the business cards given out by Saint Paul Police Officers showed that the information on some of those cards is very much out of date.

Community Outreach Efforts (including educational presentations, attendance at community events, and marketing of the PCIARC)

The Commission received feedback from the community that many people do not know of the PCIARC's existence or purpose. Moreover, those who do know of the PCIARC often do not understand how it functions, and have misconceptions about its scope and authority. This lack of knowledge about the Commission is particularly troubling because it comes from the very communities that historically complain of negative encounters with the police. Similar comments about the Commission were also reported from police officers themselves; many of whom are unaware of the PCIARC or have misconceptions about its powers and functioning. Both of these realities suggest that the PCIARC must expand the community's knowledge of its existence, purpose and functioning in order to live up to its mandate.

The PCIARC needs budgetary support from the Mayor's Office in order to make the PCIARC more visible in the community.

The PCIARC needs to increase awareness of its presence and mandate within the community—including within the Police Department

The Commission needs to make inroads in a variety of communities, including those not represented on the Commission

The Commission needs to provide guidelines for Commissioners' presentations so they can address community expectations when providing information.

Proposed Actions for Community Outreach Efforts:

1. Obtain an expanded budget to support PCIARC operations
2. Update the PCIARC website
3. Develop understandable ("plain language") talking points for Commissioners who do public presentations about the PCIARC
4. Clarify what is appropriate for Commissioners to publicly discuss when they are presenting about the PCIARC, including how to avoid being seen as an advocate for either the complainant or police rather than a neutral party providing information

5. Finalize a short, concise PCIARC purpose statement⁶
6. Expand event participation by visiting high schools, colleges, and other unreached communities
7. Expand outreach to marginalized communities, such as youth, communities for whom English is not their first language, and the LGBTQ communities
8. Develop PCIARC branding and swag to go with it
9. Offer outreach to the Police Department to ensure that officers understand the PCIARC and its operations.

Policy Review and Recommendations

The PCIARC has a mandate to make recommendations for change to certain Police Department policies.⁷ The 2001 NAACP Agreement also necessitates that the Commission review policies that may have a disparate impact on certain communities. Without complete and accurate complaint data, it is challenging to determine how often the public may be negatively impacted by certain policies and practices of the Police Department.

The Commission needs the support of the Mayor's Office, the City Attorney's Office, and perhaps City Hall, as well as collaboration from the Police Department in order to receive a full accounting of complaints and meet its reporting mandate under law and the NAACP agreement.

The Commission needs a methodology for reviewing and making recommendations about Police Department policies.

Proposed Actions for Policy Review and Recommendations:

1. The PCIARC adopted a Policy Recommendation Protocol⁸ (hereinafter "Policy Protocol") to be used when addressing concerns about Police Department Policies. The Policy Protocol provides a methodology for identifying, analyzing, and making

⁶ This statement was presented at the Strategic Planning Meeting and has since been used at other venues such as the PCIARC Annual Summit. See Appendix C.

⁷ Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.01(a), stating that the Commission was designed to, "assure the public that police services are delivered in a lawful and nondiscriminatory manner, and build upon the 2001 agreement entered into between the City and NAACP", Code of Ordinances, Chapter 102, Sec. 102.03(g); NAACP Agreement, page 4.

⁸ Appendix D.

recommendations for change to Police Department policies that seem to cause confusion or raise concern within the community or the police department.

- a. The Policy Protocol provides for appointment of subcommittees of Commission members, aided by the PCIARC Coordinator, who will assist in research as directed,
- b. provides guidelines and methodology for arriving at recommended changes to the policy, and
- c. provides for follow-up to determine if those changes were accepted and implemented by the Police Department.

Community Meetings and Input

The Commission noted that it is required to hold an Annual Summit to apprise the community of its work and progress, and to answer questions and receive community input.⁹ In 2017 the Summit was held in the fall, and was scheduled to be held again in the fall of 2018¹⁰

The Commission needs to synchronize data collection and reporting periods in order to give the community a timely report of its progress

The PCIARC realized that holding the Summit in the fall does not permit it to report on the most current data. Therefore, holding the Annual Summit again in the fall would unnecessarily delay the community in receiving data about the most recent year. Therefore, the PCIARC decided, as a one-time practice, to hold two Annual Summits over the course of less than a year in order to synchronize data collection and reporting periods.

The Commission needs to provide more opportunities for community input, in keeping with the NAACP Agreement.

⁹ Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.03(k); Appendix A, pages 3-4.

¹⁰ The 2018 Annual Summit was held on November 13, 2018.

Proposed Actions for Community Meetings and Input:

1. Hold the 2018 PCIARC Annual Summit in November of this year in order to comply with the NAACP Agreement, but make it less ambitious ¹¹
2. Move the 2019 Annual Summit to the spring in order to ensure that a full year's worth of data will be promptly available for analysis and reporting
3. Consider ways in which the three additional community meetings –required by the NAACP Agreement -- might be used to capture community input, and/or comments on changes to Police Department policies ¹²
4. Reach out to Communities of Faith in seeking venues for community meetings.

Ongoing Training for Commissioners (both mandatory and development opportunities)

The PCIARC needs an expanded budget in order to participate in national training that will increase its knowledge and credibility.

The PCIARC needs support from the Mayor's Office and the Police Department in order to increase its knowledge of Saint Paul Police Department policies, practices and training.

The Commission would like to gain a better understanding and get the perspectives of a variety of other communities and their interactions with police.

Proposed Actions for On-going Training for Commissioners (both mandatory and development opportunities):

1. All Commissioners should have the opportunity to attend the annual conference of the National Association for Civilian Oversight of Law Enforcement (hereinafter "NACOLE"). Additionally, those who choose to should be able to seek certification through that

¹¹ Although the Commission agreed to a less ambitious Annual Summit, in practice it was not possible to accomplish this due to the nature of the information that had to be presented and the desire to fulfill the spirit of the NAACP Agreement. The full Summit was held on November 13, 2018 at Mitchell Hamline College of Law.

¹² The NAACP Agreement is primarily focused on required changes within the operation of the Saint Paul Police Department, and was developed while the PCIARC was still housed within and operated by the Police Department. While these meeting responsibilities arguably do not fall upon the PCIARC, the Commission discussed ways in which it could support the Agreement by increasing community involvement. See Appendix A, pages 3-4.

organization.¹³ Alternatively, if budgetary constraints prevent voluntary attendance by all those seeking it, Commissioners might rotate their yearly NACOLE attendance in order to provide more Commissioners with the opportunity to attend ¹⁴

2. Increase the cultural intelligence of Commission members by seeking input from a wide variety of communities, including those whose membership is not represented on the Commission, and asking for their input about their interactions with the Police Department. As examples, these groups could include young men of color under the age of 25, certain ethnic minority communities, communities for whom English is not their first language, and members of the LGBTQ community
3. Commissioners are encouraged to participate in more than one yearly ride-along with the Police Department
4. Commissioners should have the opportunity to participate in more in-depth training in Saint Paul police work.

Outreach to Other Organizations

The Commission recognized that it could benefit greatly from the support and knowledge of other organizations in implementing the proposed actions under this plan. In particular, Commissioners identified organizations with parallel or overlapping goals that could be contacted for support and insight.

Proposed Actions for Outreach to Other Organizations:

1. Meet with other cities' police civilian oversight committees to share knowledge and best practices.
2. Expand outreach to other organizations that have parallel goals; for example: faith-based organizations, the International Association of Chiefs of Police, Saint Paul Public Schools, local colleges, the Immigrant Law Center, the Center for Victims of Torture, Job Corps, and many others
3. Connect with the City's Director of Community-First Public Safety.

¹³ One has to obtain 45 hours of NACOLE-approved training and attend two annual NACOLE conferences over a three-year period in order to become a certified police oversight professional. Most of the 45 hours can be obtained by attending the annual NACOLE conference. https://www.nacole.org/cpo_credential_program

¹⁴ The 2015 Audit of the PCIARC recommended that at least 1/3 of the Commissioners be sent to the NACOLE conference each year. Ibid., page 42.

Other Concerns Tabled for Later

In addition to taking specific actions in those six areas listed above, the PCIARC acknowledged that there were some actions that needed work but would have to be addressed later:

Case Intake and Review:

- i. Consideration of including mediation as an option in the complaint process
- ii. Reaching an agreement with the Police Department to get demographic information about police officers involved in complaints so that it can be included in the PCIARC's reports
- iii. Reaching an agreement with the Police Department to present its investigative reports in a consistent format.

Community Outreach Efforts:

- i. Obtaining marketing and other professional help with outreach.

The PCIARC Draft Strategic Plan

Introduction:

The following document represents the draft strategic plan for the Saint Paul Police Civilian Internal Affairs Review Commission (hereinafter “the PCIARC” or “the Commission”). The PCIARC’s role is to provide a community voice in decisions about complaints against Saint Paul Police officers. This plan was developed as a road map for the Commission in carrying out its mandate over the next several years. It captures the discussions, conclusions and decisions reached by the Commission during a strategic planning meeting held on September 15, 2018. This Plan will be revised by the PCIARC as circumstances and the passage of time dictate.

History of the PCIARC

Saint Paul first established a police civilian oversight board in 1994; however, the PCIARC, which was granted more oversight authority, was established in 2001. The PCIARC resulted from an agreement mediated by the U.S. Department of Justice between the Saint Paul Chapter of the NAACP and the Saint Paul Police Department (“NAACP Agreement”).¹⁵ The NAACP and other community organizations had voiced concerns to the Department of Justice about racial profiling by Saint Paul police. Specifically, the NAACP alleged that African Americans, in particular, were being treated inequitably by members of the Saint Paul Police Department. As a result of this Agreement, the Saint Paul Police Department agreed to change some of its practices and policies, including collecting more demographic information about its encounters with community members and complaints about police behavior.

When it was first established, the PCIARC was operated through and met exclusively at Saint Paul Police Department offices. Of the seven Commission members, two were representatives of the Saint Paul Police department. There was very limited demographic diversity in the Commission membership.

In 2016, the Saint Paul City Council voted to increase the number of Commissioners to nine, eliminate the two police representatives from the Commission, and to place the PCIARC under the City’s Department of Human Rights and Equal Economic Opportunity (hereinafter, “Human Rights” or “HREEO”). In doing so, the Council cited two recent independent audits questioning the Commission’s transparency and independence in its decision-making, its limited

¹⁵ Agreement Between St. Paul Police Department and St. Paul Chapter of the NAACP, June 20, 2001 <http://mn-stpaul.civicplus.com/DocumentCenter/Home/View/3584>

accessibility to the public, lack of diversity in Commission membership, and limited data collection and reporting related to race-based policing and racial profiling.¹⁶

In August 2017, eight new commissioners were selected to begin operations under the PCIARC's new mandate. In September 2017, they were sworn in and received data privacy and other required training, and held their first official meeting in October 2017. One of the newly-selected eight began service in January 2018, after the term of one of the previously seated, long-serving commissioners expired. Another of the commissioners, who had been seated in mid-2016, remained on the newly mandated Commission.¹⁷

As of the Strategic Planning meeting in September 2018, the PCIARC had seven members. Two members had resigned earlier in the year due to employment obligations.¹⁸

While the PCIARC arose from allegations of inequitable policing of African Americans, it has since served as a resource for all persons who wish to complain about their interactions with the City's police department.

The PCIARC Mandate and Operations

The authorizing legislation for the PCIARC can be found in City of Saint Paul, Code of Ordinances Part III, Title V, Chapter 102.

The PCIARC's mandate and operations are summarized as follows:

PCIARC Mandate

- a) The PCIARC gives people a voice in how complaints about Saint Paul police officers are handled. It is specifically charged with, "assuring the public that police services are delivered in a lawful and nondiscriminatory manner."¹⁹

¹⁶ Report of the Best Practices Assessment of the St. Paul Police Department, Berkshire Advisors, Inc., January 14, 2009 [http://extras.twincities.com/pdf/SPPD - Volume 1 1.6.pdf](http://extras.twincities.com/pdf/SPPD_-_Volume_1_1.6.pdf) ; Report of the Audit of the St. Paul Police Civilian Internal Affairs Review Commission <https://www.stpaul.gov/DocumentCenter/View/81444.pdf>

¹⁷ Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.05 (any Commission member holding office on September 1, 2016 may serve out his/her term).

¹⁸ As of January 2019, the PCIARC has eight commissioners. Two new commissioners were appointed in October 2018, and one commissioner resigned effective January 2019. The two newly-appointed commissioners have been unable to participate in deliberations or vote, as they are awaiting scheduling of the police/civilian training, which is a prerequisite for participation. City of Saint Paul Code of Ordinances Part III, Title V, Chapter 102, Sec. 102.02(f), 102.03(b), "Any person who has been appointed to the commission but has not yet met the criteria to become a voting member may attend commission meetings but may not vote or participate in the discussion...Each member of the commission shall, prior to voting on any matter before the commission, participate in a training program which shall include topics related to police work, investigation..."

¹⁹ City of Saint Paul, Code of Ordinances Part III, Title V, Chapter 102, Sec. 102.1(a)

- b) The Commission is specifically mandated to review complaints relating to alleged acts of excessive force, inappropriate use of firearms, discrimination (as defined by City Code), racial profiling, poor public relations, and any other complaints referred to it by the Mayor, the Director of Human Rights, and the Saint Paul Chief of Police.²⁰

Currently there is a difference in interpretation of this mandate between the Police Department and Human Rights/PCIARC, which is impacting the PCIARC's ability to review all of the appropriate complaints and to collect complete data on complaints. The Police Department does not currently report all civilian complaints relating to the above-listed areas to the PCIARC; it reports only those civilian complaints that its internal affairs unit investigates. The Commission contends that it should receive notice of all civilian complaints related to the five categories of complaints outlined in the PCIARC Ordinance, regardless of whether they are investigated. A more in-depth discussion of these differing interpretations of the Ordinance can be found later in this document under *Case Intake and Review*.

- c) The PCIARC will review all complaints fairly for both civilians and police.²¹ Both parties to a complaint are given the opportunity to present their documentation and offer witnesses as part of an investigation, and may choose to appear before the Commission to give testimony. Additionally, although they cannot participate in deliberations, representatives from the Police Department are available at all Commission meetings to answer questions from Commissioners about Saint Paul Police policies and procedures.
- d) The PCIARC makes recommendations to the Saint Paul Chief of Police about any action to take regarding a complaint.²² Additionally, if the complaint is sustained (i.e., the Commission concludes that there was misconduct by an officer) the Commission makes recommendations as to what, if any discipline, should be imposed.

²⁰ Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.1(b)

²¹ Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.1(a)

²² Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.03(g)

- e) By law, the Police Chief makes the final decision about action on any complaint.²³ This means that the Chief may choose not to accept the Commission's conclusions or recommendations as to whether the complaint is or is not sustained, as well as whether there should be discipline and the form or severity of the discipline. If the Chief disagrees with a Commission recommendation, s/he must notify the PCIARC and provide five days for a response. Ultimately, however, the Chief has the final word on what action will be taken.²⁴
- f) In addition to reviewing and making recommendations about the handling of complaints, the PCIARC is also charged with making recommendations about police policies that may warrant change.²⁵ Policies relating to use of force, firearm discharge, and traffic stops and accidents are examples of policies that are likely to significantly impact the community.

PCIARC Operations

- a) The nine PCIARC members are chosen by the Mayor from all over Saint Paul. They represent diversity of age, gender, geography, race/ethnicity and life and professional experiences. All PCIARC members are volunteers, who spend an average of 30-40 hours per month reviewing complaints and conducting other Commission business; the Chair and Vice Chair may spend upwards of 50 hours. They receive a stipend of \$50.00 per Commission meeting; other activities are not reimbursed.
- b) All Commission members are required to complete a ten-week, comprehensive Police Civilian Training course of 30 hours, in which they learn about use-of-force practices and policies, traffic stops, firearms, and other work of the Saint Paul Police department. Their training is parallel to that of Saint Paul Police officers. They also participate in ride-alongs with Saint Paul Police officers. Additionally, because of the sensitive nature of the documents they review, all Commission members receive training on state and

²³ Minnesota Statutes, section 626.89, subdivision 17 (2018). "A civilian review board, commission, or other oversight body shall not have the authority to make a finding of fact or determination regarding a complaint against an officer or impose discipline on an officer. A civilian review board, commission, or other oversight body may make a recommendation regarding the merits of a complaint; however, the recommendation shall be advisory only and shall not be binding on nor limit the authority of the chief law enforcement officer of any unit of government."

²⁴ Minn. Stat. sec. 626.89, subd. 17(j); Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.03(j).

²⁵ Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.03(g)

federal data privacy laws, learn about collective bargaining requirements and protections, and receive trainings on implicit bias and other employment expectations, the same as City employees. Some PCIARC members have also participated in national police civilian oversight training events, and many participate in continuing education coursework related to policing and civilian oversight.

- c) The PCIARC meets at different places in the community each month. In keeping with its desire to be transparent and connect with the community, the Commission meets at various community centers across Saint Paul. Its meeting places and times are posted on the City of Saint Paul website.
- d) The PCIARC welcomes feedback and questions from the community. In accordance with the 2001 NAACP Agreement, the Commission holds an annual community summit to discuss its work with residents of Saint Paul and other interested parties. Additionally, the PCIARC members attend community events, such as Rondo Days and Hmong New Year celebrations, and present at city District Council meetings and other community venues. The PCIARC Coordinator is also available to receive feedback and answer questions from the Community, and can be reached at 651-266-8970, or civilianreview@ci.stpaul.mn.us.

Information about the PCIARC or how to file a complaint about police misconduct can be found at <https://www.stpaul.gov/departments/human-rights-equal-economic-opportunity/police-civilian-internal-affairs-review> or by calling 651-266-8970.

Background of Draft Strategic Plan Development

In discussing and developing the PCIARC draft strategic plan, the Commission engaged in self-evaluation, as well as considering input from the community and other sources.

The PCIARC Year in Review (October 2017 – July 2018)

In July 2018, in anticipation of the Strategic Planning Meeting, Commission members were asked their impression of the PCIARC's functioning – what they saw as strengths, impediments, how those should be addressed, and where they thought the Commission needed assistance and should focus its efforts.

The Commission members were in agreement that since their appointment they had functioned well as a team and were respectful of each other's opinions, even when they

disagreed. They were all satisfied that they had been conscientious in preparing for, discussing and deciding cases, and had excellent attendance at meetings. They also applauded their diversity of background, age, race, gender, geography, personal and professional experiences. They believed that their diversity as well as their preparedness in discussing cases worked well together and contributed to their ability to make well-reasoned and appropriate decisions.

As to impediments, commissioners cited: continuing problems with City technology, lack of visible support from the Mayor's office, concern about whether they were being given all of the appropriate cases as required by City ordinance²⁶, concern about demographic gaps in Commission membership (the PCIARC had lost some of its diversity with the resignation of two commissioners earlier in the year, and did not have representation from one of the city Wards), and some felt that the PCIARC needed to spend more time discussing its mission.

As to priorities for the coming year, Commissioners had stated – in order of preference - that they wanted: more visibility of the PCIARC within the community, more support for the PCIARC from the City, more and better data collection, and more frequent release of summary data concerning complaints. These earlier responses of Commissioners were later reflected in discussions and decisions made concerning the PCIARC draft strategic plan.

Review of Requirements of 2001 NAACP Agreement and Recommendations from the 2015 Audit of the PCIARC

In addition to a review of their performance in the previous months, Commissioners undertook a review of the 2001 NAACP Agreement with the Saint Paul Police Department (NAACP Agreement)²⁷, and of the 2015 Audit of the PCIARC.²⁸ Specifically, the Commission compared what was required by the NAACP Agreement to the work of the PCIARC over the past 11 months. They discussed the Agreement requirements along with ways in which they could better incorporate those requirements into the Commission's work moving forward. Secondly, they also considered how the recommendations from the 2015 Audit of the PCIARC might be used to augment or improve the PCIARC's functioning.

Discussion of Community Comments and Knowledge Concerning PCIARC

In its deliberations about the draft strategic plan, the Commission also considered comments from the PCIARC's Annual Summit, held in November 2017, as well as comments presented to the PCIARC members and the PCIARC Coordinator at various community functions. These

²⁶ See discussion under *PCIARC Mandate*, subdivision b., page 10 of this document

²⁷ Appendix A, Agreement Between St. Paul Police Department and St. Paul Chapter of the NAACP, <http://mn-stpaul.civicplus.com/DocumentCenter/Home/View/3584>

²⁸ Appendix B, Report of the Audit of the St. Paul Police Civilian Internal Affairs Review Commission <https://www.stpaul.gov/DocumentCenter/View/81444.pdf>

comments supported the concerns of Commission members that many in the community did not know of the PCIARC's existence, and were not clear about its functioning even if they did know of its existence. There was also concern that many in the Saint Paul Police Department were unfamiliar with the PCIARC and had misconceptions about its functioning, as well.

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Overview of Draft Strategic Plan

The PCIARC draft strategic plan reflects the goal of the Commission to fulfill its mandate under the NAACP Agreement and City Ordinance. The PCIARC wants to instill faith in the community that “police services are delivered in a lawful and nondiscriminatory manner.”²⁹ In doing so, the PCIARC hopes to make Saint Paul a model of police civilian oversight and collaboration between civilian oversight agencies and police departments. Each of the six areas identified in the Plan contain ambitious action steps designed to help the Commission meet those goals. Many of these steps require support from the Mayor’s Office, City Council, City Attorney’s Office, and the Police Department.

Background

The PCIARC met on September 15, 2018 for an all-day Strategic Planning session to discuss its progress over the past 11 months and to lay out its priorities for the coming year(s). Six of the seven Commission members were present: Chair Constance Tuck, Vice Chair Rachel Sullivan-Nightengale, Commissioner Daria Caldwell, Commissioner Sasha Cotton, Commissioner Eric Forstrom, and Commissioner Rick Heydinger.³⁰ Commissioner Kristen Clark was unable to be present due to a previously arranged out-of-town meeting.

In developing the PCIARC draft strategic plan, Commission members: discussed their functioning and progress since their first official meeting (October 2017), reviewed requirements under the 2001 NAACP Agreement with the Saint Paul Police Department³¹ (NAACP Agreement), reviewed the recommendations of the 2015 Audit of the PCIARC,³² discussed the current functioning of case intake and review and the concern about having complete data sets, and considered comments from the Saint Paul community, including members of the Saint Paul Police Department.

Areas Targeted for Action

As a result of the aforementioned discussions and considerations, the Commission made decisions to take action in six areas of their work: Case Intake and Review, Community Outreach, Policy Review and Recommendations, Community Meetings and Input, On-going Training for Commissioners, and Outreach to other Organizations.

²⁹ City of Saint Paul, Code of Ordinances Part III, Title V, Chapter 102, Sec. 102.1(a).

³⁰ At that time there were only seven commissioners; two had resigned earlier due to employment obligations.

³¹ Agreement Between St. Paul Police Department and St. Paul Chapter of the NAACP, <http://mn-stpaul.civicplus.com/DocumentCenter/Home/View/3584>

³² Report of the Audit of the St. Paul Police Civilian Internal Affairs Review Commission
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Case Intake and Review:

As noted earlier in this document, the PCIARC is concerned that they are not receiving a full accounting of all civilian-initiated complaints. Part of this concern can be attributed to differing interpretations by the Police Department and PCIARC/Human Rights of the somewhat ambiguous wording of the PCIARC's enabling ordinance ("PCIARC Ordinance").³³

The PCIARC needs support from the Mayor's Office and the City Attorney's Office, and collaboration from the Police Department, in order to be certain that it is reviewing all complaints within its purview, and receiving a full accounting of complaints filed with the Police Department.

Section 102.01(a) of the PCIARC Ordinance states, "Citizen review, in conjunction with police, of *complaints* against officers will assure that *complaints* are dealt with fairly and with due regard for officers and citizens equally (emphasis added)." The following subsection of the PCIARC Ordinance states,

"The commission shall review all *complaint investigations* concerning members of the police department who are certified by the Minnesota Board of Peace Officer Standards and Training, completed by the internal affairs unit of the police department and subsequent *investigations* thereof related to alleged acts of excessive force, inappropriate use of firearms, discrimination, as defined in Chapter 183.12 of this Code, racial profiling, poor public relations and such other complaints as may be referred to it by the mayor, the chief of police, or the director of the Department of Human Rights and Equal Economic Opportunity. The Commission shall also collect and review summary data on *complaints received* and report to the mayor and council any patterns which may merit further examination." City of Saint Paul, Code of Ordinances Part III, Title V, Chapter 102, Sec. 102.1(b) (emphasis added).

The interpretation of Section 102.1 by the Police Department is that the PCIARC Ordinance requires the Police Department to refer to PCIARC only those civilian-initiated complaints that are *investigated* by the Police Department's Internal Affairs Unit. Such an interpretation of the PCIARC Ordinance leaves out any and all civilian complaints *received* by the Police Department but not investigated by them. The Commission notes that such an interpretation of the Ordinance prevents the PCIARC from reviewing all applicable civilian complaints, and also hampers its ability to comply with its statutory mandate to collect complaint data and report

³³ The concerns shared by the PCIARC are also shared by the City's HREEO Department, which provides administrative and budgetary support to PCIARC.

on, “any patterns [among complaints] which may merit further examination.”³⁴ Further, the PCIARC contends that the Police Department’s interpretation of the Ordinance runs counter to the 2001 NAACP agreement, which requires, “All civilian initiated complaints and investigations will be reviewed by the Police Internal Affairs Review Commission (emphasis added).”³⁵ These competing interpretations of the PCIARC Ordinance and mandate can only be resolved through intervention by the Mayor’s Office and the City Attorney’s Office, and collaboration from the Police Department.

The PCIARC needs support from the Mayor’s Office, the City Attorney’s Office, and City Council, and collaboration from the Police Department, in order to have input on all use-of-force incidents resulting in serious bodily injury or property damage.

Another concern of the PCIARC is that the Ordinance as currently written has been applied in a manner that has prevented the PCIARC from having a say in the disposition of several high-profile use-of-force incidents in which civilians were severely injured.³⁶ Because the Police Department acted swiftly and unilaterally to discipline the officers involved, no formal complaint was filed. As a result, the Commission neither had the opportunity to review the facts in these incidents --which contained the earmarks of potential excessive-use-of-force-- nor to make recommendations as to appropriate actions in these incidents. The Commission only heard about these incidents when they were publicized in the news, and after final decisions had been made about the appropriateness of police responses.

The PCIARC appreciates the political and legal implications of these unfortunate events; however believes that the Police Department’s failure to engage with or notify the Commission in these circumstances has worked to undercut its mandate under the PCIARC Ordinance, and undermines the spirit of the NAACP agreement. It may be possible to resolve this concern through support from the Mayor’s Office and the City Attorney’s Office, along with collaboration from the Police Department; an amendment to the PCIARC Ordinance would also require support of the City Council.

³⁴ Saint Paul Code of Ordinance, Chapter 102, Sec. 102.01(b)

³⁵ Appendix A, page 3.

³⁶ The following are links to newspaper articles concerning these two cases; one case occurred in fall of 2017, one in summer of 2018. Additionally, a third case from May 2017, involving K9 Jaeger --mentioned in passing in the Star Tribune article --also does not appear to have been brought to the attention of the PCIARC.

<https://www.twincities.com/2018/07/09/after-st-paul-police-dog-bites-bystander-department-announcing-significant-changes-to-k-9-unit/> ; <http://www.startribune.com/st-paul-to-pay-520-000-to-bystander-attacked-by-police-k-9/494625261/>

The current process for civilians to file a complaint makes it difficult to ensure that all complaints are being properly accounted for; this may require involvement by the Mayor's Office, and possibly by the City Attorney's Office, City Council, and the NAACP of Saint Paul, as well as collaboration from the Police Department.

Currently civilians can file a complaint through the PCIARC/Human Rights, through one of the PCIARC community intake centers, or through the Police Department. While the PCIARC and the PCIARC intake centers use the same intake form and methodology, it is not clear if there is consistency in the intake process at the Police Department; nor is it clear how complaints received by the Police Department that are not investigated are tallied or reported.

For example, the Police Community Feedback website offers the public the opportunity to provide comments about their interactions with police officers. Some of those comments may indeed meet the definition of a complaint as noted in state law and the PCIARC Ordinance.³⁷ It is unclear if the Police Department makes any accounting of complaints of police misconduct made via this website; however, it is clear that if such an accounting is being made, it is not being provided to the PCIARC for inclusion in its annual reporting of complaints.

The PCIARC Ordinance does not specify whether the PCIARC or the Police Department has controlling responsibility for where complaints are filed; however, both the Ordinance and the NAACP Agreement are clear that the PCIARC has the responsibility for making a full accounting of complaints. Currently, it appears that the PCIARC cannot do so. These potential inconsistencies in the intake and recording of complaints clearly impact the Commission's ability to make a full accounting of complaints, as required by its mandate and the NAACP Agreement.³⁸ Resolution of these concerns about intake and recording of complaints may require involvement from the Mayor's Office, the City Attorney's Office, and City Council, as well as consultation with the NAACP of Saint Paul, and collaboration from the Police Department.

Proposed Actions for Case Intake and Review:

1. Clarify how and with whom complaints are to be filed, i.e., should they all come to the PCIARC or its community intake points, or should complainants also have the option to file with the Police Department?

³⁷ Minn. Stat. Sec. 626.89, subd. 5 (explaining the elements necessary for filing a complaint against a police officer); City of Saint Paul Ordinance, Sec. 102.04(a) (explaining the elements necessary for filing a complaint with the PCIARC); <https://www.stpaul.gov/police-community-feedback-form>; <https://www.stpaul.gov/report-incident>

³⁸ The NAACP Agreement requires several specific points of intake for civilian complaints. Appendix A, pages 3,4 and 7 in this document.

- a. If they continue to be filed with the Police Department, the PCIARC will work with the Police Department to develop a clear procedure so that the PCIARC is always apprised of the complaint, regardless of whether an investigation is subsequently initiated.
 - b. If necessary, make changes to the PCIARC-related information on the current business cards that officers are given to hand out³⁹
 - c. Train officers to understand the PCIARC's role in the complaint, disciplinary and policy recommendation processes.
4. Create a complete taxonomy of complaint data sets, including all complaints initiated by Police Department's Internal Affairs unit, complaints handled by Human Rights that were never brought to the PCIARC, and complaints gathered from the Police Department's Community Feedback website.

Responsible parties: Commissioner Kristin Clark (pending her agreement to serve), Vice Chair Rachel Sullivan-Nightengale, Chair Constance Tuck, PCIARC Coordinator Julian Roby

Community Outreach Efforts (including educational presentations, attendance at community events, and marketing of the PCIARC)

The PCIARC needs budgetary support from the Mayor's Office in order to make the PCIARC more visible in the community.

The PCIARC has only one full-time staff member – the PCIARC Coordinator. Other than money for the Coordinator's salary, the Commission does not have an administrative budget. This means that the PCIARC is limited in its ability to make presentations, and to purchase marketing materials, such as posters and inexpensive swag to advertise itself within the community. These staff support and fiscal challenges, along with the fact that all Commission members are volunteers who already devote about 20 hours a month to their duties, hamper the PCIARC's ability to engage fully in community outreach.

The PCIARC needs to increase awareness of its presence and mandate within the community—including within the Police Department

³⁹ A subsequent check of the PCIARC-related information on the business cards given out by Saint Paul Police Officers showed that the information on some of those cards is very much out of date.

As noted earlier in this document, the Commission received feedback from the community that many people do not know of the PCIARC's existence or purpose. Moreover, those who do know of the PCIARC often do not understand how it functions, and have misconceptions about its scope and authority. This lack of knowledge about the Commission is particularly troubling because it comes from the very communities that historically complain of negative encounters with the police. Similar comments about the Commission were also reported from police officers themselves; many of whom are unaware of the PCIARC or have misconceptions about its powers and functioning. Both of these realities suggest that the PCIARC must expand the community's knowledge of its existence, purpose and functioning in order to live up to its mandate.

The PCIARC needs to develop talking points and other marketing tools.

As part of its outreach efforts, the Commission needs written marketing tools, including a short, concise purpose and process statement for use in explaining the PCIARC to the community – including police officers.

The Commission needs to provide guidelines for Commissioners' presentations so they can address community expectations when providing information.

One concern expressed about making presentations within the community was that some members of the public assume that Commissioners will act solely as their advocates and always take their side in complaints. Such a belief is neither in keeping with the Commission's practices, nor its mandate to, "assure that complaints are dealt with fairly and with due regard for officers and citizens equally."⁴⁰ Commissioners requested development of talking points and guidelines to assist them in properly representing the PCIARC to the community.

The Commission needs to make inroads in a variety of communities, including those not represented on the Commission

Historically, the PCIARC has not consistently done outreach to groups containing young men of color, communities for whom English is not their first language, the LGBTQ community, and certain other non-majority communities, with whom police are more statistically likely to have encounters. These communities could benefit from increased understanding of their rights under the PCIARC Ordinance.

⁴⁰ City of Saint Paul Ordinance, Chapter 102, Sec. 102.01(a)

Proposed Actions for Community Outreach Efforts:

1. Obtain an expanded budget to support PCIARC operations
2. Update the PCIARC website
3. Develop understandable (“plain language”) talking points for Commissioners who do public presentations about the PCIARC
4. Clarify what is appropriate for Commissioners to publicly discuss when they are presenting about the PCIARC, including how to avoid being seen as an advocate for the complainant rather than a neutral party providing information
5. Finalize a short, concise PCIARC purpose statement⁴¹
6. Expand event participation by visiting high schools, colleges, and other unreached communities
7. Expand outreach to marginalized communities, such as youth, communities for whom English is not their first language, and the LGBTQ communities
8. Develop PCIARC branding and swag to go with it, as permitted by the budget
9. Offer outreach to the Police Department to ensure that officers understand the PCIARC and its operations.

Responsible parties: Commissioner Daria Caldwell, Vice Chair Rachel Sullivan-Nightengale, Chair Constance Tuck

Policy Review and Recommendations

The PCIARC has a mandate to make recommendations for change to certain Police Department policies.⁴² The 2001 NAACP Agreement also necessitates that the Commission review policies that may have a disparate impact on certain communities.

⁴¹ This purpose and process statement was presented at the meeting and has since been used at the PCIARC Annual Summit this past November, and at other venues. See Appendix C.

⁴² Saint Paul Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.01(a), stating that the Commission was designed to, “assure the public that police services are delivered in a lawful and nondiscriminatory manner, and

The Commission needs the support of the Mayor’s Office, the City Attorney’s Office, perhaps City Hall, as well as collaboration from the Police Department in order to receive a full accounting of complaints so it can meet its reporting mandate under law and the NAACP agreement.

As noted earlier, without complete and accurate complaint data, it is challenging to determine how often the public may be negatively impacted by certain policies and practices of the Police Department.⁴³ In some cases, however, the Commission may appropriately offer recommendations about a policy in considered anticipation of its effect on the community members. Policies relating to use of force, firearm discharge, traffic stops and accidents, and those previously noted as having a disparate impact on certain communities are examples of such policies.

The Commission needs a methodology for reviewing and making recommendations about Police Department policies.

The PCIARC realized that it needed to develop a systematic method for determining what policies to examine, how to analyze their impact, how to develop appropriate recommendations, and how to follow up to see if or how those recommendations were implemented.

Proposed Actions for Policy Review and Recommendations

1. The PCIARC adopted a Policy Recommendation Protocol⁴⁴ (hereinafter “Policy Protocol”) to be used when addressing concerns about Police Department Policies. The Policy Protocol provides a methodology for identifying, analyzing, and making recommendations for change to Police Department policies that seem to cause confusion or raise concern within the community or the police department.
 - a. The Policy Protocol provides for appointment of subcommittees of Commission members, aided by the PCIARC Coordinator, who will assist in research as directed,

build upon the 2001 agreement entered into between the City and NAACP”, Code of Ordinances, Chapter 102, Sec. 102.03(g); NAACP Agreement, page 4.

⁴³ See *Case Intake and Review*, pages 11-14.

⁴⁴ Appendix D.

- b. provides guidelines and methodology for arriving at recommended changes to the policy, and
- c. provides for follow-up to determine if those changes were accepted and implemented by the Police Department.

Responsible parties: Commissioner Sasha Cotton, Commissioner Eric Forstrom, Commissioner Rick Heydinger,⁴⁵ Vice Chair Rachel Sullivan-Nightengale

Community Meetings and Input

The Commission noted that it is required to hold an Annual Summit to apprise the community of its work and progress, and to answer questions and receive community input.⁴⁶ In 2017 the Summit was held in the fall, and was scheduled to be held again in the fall of 2018⁴⁷

The Commission needs to synchronize data collection and reporting periods in order to give the community a timely report of its progress

The PCIARC realized that holding the Summit in the fall does not permit it to report on the most current data. Therefore, holding the Annual Summit again in the fall would unnecessarily delay the community in receiving data about the most recent year. Therefore, the PCIARC decided, as a one-time practice, to hold two Annual Summits over the course of less than a year in order to synchronize data collection and reporting periods. The Commissioners decided that beginning in April 2019, the PCIARC Annual Summit would be held in the spring. Doing so would provide the public with the most timely and complete information about the PCIARC's yearly operations.

The Commission needs to provide more opportunities for community input, in keeping with the NAACP Agreement.

In addition to the Annual Summit, The NAACP Agreement requires three other meetings per year in which compliance with the Agreement is discussed. Commissioners discussed ways in which they might assist the Police Department to comply with this requirement by offering the community the ability to provide input, being mindful of venues that might be easily accessible for the community and that might also help with publicity about community events.⁴⁸

⁴⁵ Commissioner Heydinger resigned effective January 2019.

⁴⁶ Code of Ordinances, Part III, Title V, Chapter 102, Sec. 102.03(k); Appendix A, pages 3-4.

⁴⁷ The 2018 Annual Summit was held on November 13, 2018.

⁴⁸ See Appendix A, pages 3-4; As noted earlier, the NAACP Agreement is primarily focused on required changes within the operation of the Saint Paul Police Department; it was developed while the PCIARC was operated by and

Proposed Actions for Community Meetings and Input

1. Hold the 2018 PCIARC Annual Summit in November of this year in order to comply with the NAACP Agreement, but make it less ambitious.⁴⁹
2. Move the 2019 Annual Summit to the spring in order to ensure that a full year's worth of data will be promptly available for analysis and reporting.⁵⁰
3. Consider ways in which the three additional community meetings -- required by the NAACP Agreement-- might be used to capture community input, and/or comments on changes to Police Department policies.
4. Reach out to Communities of Faith in seeking venues for community meetings.

Responsible parties: Commissioner Sasha Cotton, PCIARC Coordinator Julian Roby

Ongoing Training for Commissioners (both mandatory and development opportunities)

The PCIARC needs an expanded budget in order to participate in national training that will increase its knowledge and credibility

The PCIARC agreed that it could benefit both from on-going training provided by national civilian oversight organizations, and from learning more about Police Department policies and practices. Commissioners noted that budgetary constraints have prevented some interested Commissioners from attending the annual conference of the National Association for Civilian Oversight of Law Enforcement (hereinafter "NACOLE"), the most widely known and respected national organization supporting police civilian oversight.

The PCIARC needs support from the Mayor's Office and the Police Department in order to increase its knowledge of Saint Paul Police Department policies, practices and training.

Commissioners agreed that they could benefit from gaining additional insight into the actual training received by Saint Paul police officers. This insight could help them to understand expectations of officers and therefore render more informed decisions about their actions, and also provide opportunities for gaining insight and making informed recommendations about

housed within the Police Department. While arguably these meeting responsibilities do not currently fall upon the PCIARC, the Commission discussed ways in which it could support the Agreement and increase community input and involvement.

⁴⁹ Although the Commission agreed to a less ambitious Annual Summit, in practice it was not possible to accomplish this due to the nature of the information that had to be presented and the desire to fulfill the spirit of the NAACP Agreement. The full Summit was held on November 13, 2018 at Mitchell Hamline College of Law.

⁵⁰ The PCIARC Annual Summit for 2019 is scheduled for April 9, 2019; location and time to be determined.

Police Department policies and practices that impact large numbers of community members. The PCIARC's participation in this training will not be possible without support from the Mayor's Office and the Police Department.

The Commission would like to gain a better understanding and get the perspectives of a variety of other communities and their interactions with police.

Further, the Commission agreed that it could also benefit from meeting with non-majority communities not represented on the Commission, in order to gain more insight into how Police Department policies and interactions impact their communities.

Proposed Actions for Ongoing Training for Commissioners

1. All Commissioners should have the opportunity to attend the annual NACOLE conference. Additionally, those who choose to should be able to seek certification through that organization.⁵¹ Alternatively, if budgetary constraints prevent voluntary attendance by all those seeking it, Commissioners might rotate their yearly NACOLE attendance in order to provide more Commissioners with the opportunity to attend⁵²
2. Increase the cultural intelligence of Commission members by seeking input from a wide variety of communities, including those whose membership is not represented on the Commission, and asking for their input about their interactions with the Police Department. As examples, these groups could include young men of color under the age of 25, certain ethnic minority communities, communities for whom English is not their first language, and members of the LGBTQ community
3. Commissioners are encouraged to participate in more than one yearly ride-along with the Police Department
4. Commissioners should have the opportunity to participate in more in-depth training in Saint Paul police work
5. Request an increase in the PCIARC budget to accommodate more training opportunities.

⁵¹ One has to obtain 45 hours of NACOLE-approved training and attend two annual NACOLE conferences over a three-year period in order to become a certified police oversight professional. Most of the 45 hours can be obtained by attending the annual NACOLE conference. https://www.nacole.org/cpo_credential_program

⁵² The 2015 Audit of the PCIARC recommended that at least 1/3 of the Commissioners be sent to the NACOLE conference each year. Appendix B, page 42.

Responsible parties: Commissioner Kristen Clark (pending her agreement to serve), Vice Chair Rachel Sullivan-Nightengale, Chair Constance Tuck, HREEO Acting Director Jeffry Martin, PCIARC Coordinator Julian Roby

Outreach to Other Organizations

The Commission recognized that it could benefit greatly from the support and knowledge of other organizations in implementing the proposed actions under this plan. In particular, Commissioners identified organizations with parallel or overlapping goals that could be contacted for support and insight.

Proposed Actions for Outreach to Other Organizations:

1. Meet with other cities' police civilian oversight committees to share knowledge and best practices
2. Expand outreach to other organizations that have parallel or overlapping goals; for example: faith-based organizations, the International Association of Chiefs of Police, Saint Paul Public Schools, local colleges, the Immigrant Law Center, the Center for Victims of Torture, Job Corps, and many others
3. Connect with the City's Director of Community-First Public Safety.

Responsible parties: Commissioner Kristen Clark (pending her agreement to serve), Vice Chair Rachel Sullivan-Nightengale, Chair Constance Tuck, Acting Director of HREEO Jeffry Martin

Other Concerns Tabled for Later

In addition to taking specific actions in those six areas listed above, the PCIARC acknowledged that there were some actions that needed work but would have to be addressed later:

Case Intake and Review:

- i. Consideration of including mediation as an option in the complaint process
- ii. Reaching an agreement with the Police Department to get demographic information about police officers involved in complaints so that it can be included in the PCIARC's reports

- iii. Reaching an agreement with the Police Department to present its investigative reports in a consistent format.

Community Outreach Efforts:

- i. Obtaining marketing and other professional help with outreach.

Summary and Conclusion:

The PCIARC draft strategic plan reflects the goal of the Commission to fulfill its mandate under the NAACP Agreement and City Ordinance. Each of the six areas identified in this draft strategic plan contain ambitious action steps designed to help the Commission meet its mandate under both City ordinance and the NAACP Agreement. The PCIARC needs support from the Mayor's Office, the City Attorney's Office, the City Council, and the Police Department to do so.