

Protecting What Matters

Forest Preserves District of Cook County

An Independent Analysis of the Forest Preserves Police Department
and the Implementation of Best Practices

FINAL REPORT

April 19, 2021

Confidential and Proprietary



 HILLARD HEINTZE

A Jensen Hughes Company

April 19, 2020

Mr. Arnold Randall
General Superintendent
Forest Preserves District of Cook County
69 West Washington Street
Chicago, Illinois 60602

Dear Superintendent Randall:

We are pleased to present our final report detailing the results of our independent analysis of the Forest Preserves Law Enforcement Department and the implementation of best practices for policing. This report includes our key findings, recommendations and proposed strategies and tactics, which we designed to serve as the basis for a Department Strategic Plan.

Forest Preserve users generally view the Forest Preserves Law Enforcement Department favorably. This assessment identifies opportunities for the Department to improve its internal culture and transform its policies and practices to become a model police department. While we have identified challenges that the Forest Preserves Law Enforcement Department must overcome, the Department's workforce is ready, willing and able to take on these challenges and support efforts to improve.

This report is a confidential and proprietary work document between Hillard Heintze and the Forest Preserves of Cook County. We are happy to discuss our findings and recommendations in further detail. Thank you for entrusting us with this critical engagement.

Sincerely,
Hillard Heintze, A Jensen Hughes Company



Robert L. Davis
Practice Lead and Senior Vice President
Law Enforcement Consulting



Table of Contents

EXECUTIVE SUMMARY	4
KEY FINDINGS.....	7
OVERVIEW OF STAKEHOLDER OUTREACH.....	11
INTERNAL CULTURE AND ORGANIZATIONAL CLIMATE	14
Perceptions of the FPPD’s Internal Culture.....	14
Practices to Improve Internal Culture	23
ORGANIZATIONAL ASSESSMENT.....	25
Police Community Relations.....	25
Current Practices.....	25
Improving Community Trust and Engagement.....	26
Recruitment, Retention and Promotion	30
Current Practices.....	30
Accountability and Complaint Investigations	38
Current Practices.....	38
Body-Worn Cameras.....	43
Force Review Board.....	44
RECOMMENDATIONS.....	46
APPENDICES.....	49
Appendix A: Recommendation Tracker.....	49
Appendix B: The Hillard Heintze Team	53



Executive Summary

Strategic Context: Why We Are Conducting This Assessment Now

In 2014, the Forest Preserves District of Cook County (FPDCC) adopted its Next Century Conservation Plan and recommitted to its goal of making all visitors feel welcome while at the Preserves. It believed it had made significant progress toward that goal until June 2018, when a man berated a woman wearing a shirt displaying the Puerto Rican flag while in Caldwell Woods. A video of the incident showed a nearby Forest Preserves Police Department (FPPD) officer seemingly ignore the woman's calls for help.¹ The man was convicted of a hate crime in 2019, and the officer resigned.

After the Caldwell Woods incident, the FPPD renewed its effort to review its equity. It launched an internal Racial Equity Diversion and Inclusion Committee to address these issues district-wide. To begin its Model Policing Initiative (MPI), the FPPD issued a request for proposals to provide an assessment. The MPI assessment seeks to find answers to the following questions regarding the FPPD:

- + What is the current state of community and police relations?
- + What is the current state of the internal culture?
- + What are the best practices to build our strengths and address challenges?

Since initiating this assessment, the FPPD has enhanced police and community relations by adopting the Ten Shared Principles.² These principles are the result of an initiative of the Illinois Association of Chiefs of Police and the Illinois NAACP to guide the relationship between law enforcement and the community. Adopting these principles is an admirable step in increasing community trust. In addition, the FPPD trained its staff on implicit bias and purchased body-worn cameras (BWCs). It is working on implementing a BWC program for officers.

Assignment: What You Asked Us to Do

We were asked to conduct an independent assessment of the FPPD and recommend best practices to:

- + Maintain and strengthen police and community relations.
- + Create a work culture that is inclusive and equitable to all people.
- + Support a diverse police force through recruitment, retention and promotion.

¹ <https://www.chicagotribune.com/news/breaking/ct-met-cook-county-forest-preserves-investigation-20180710-story.html>

² <https://fpdcc.com/forest-preserves-police-commitment-to-our-community/>



Our report recommends best practices and includes a work plan, timetable and cost estimates for implementing the best practices, as well as tools to measure progress toward those goals.

Methodology: How We Conducted This Assessment

Six Key Principles

Emerging from our experiences as leaders in a variety of public safety-related fields, the Hillard Heintze methodology is based on the following six strategic principles:

- + Independent and objective analysis
- + Solicitation of multiple perspectives and viewpoints
- + An acute focus on collaboration and partnership
- + An information-driven, decision-making mindset
- + A structured and highly disciplined engagement approach
- + Clear and open lines of communication

An Intensive Approach

During this engagement, Hillard Heintze conducted the following tasks and activities:

- + Reviewed FPPD policies, orders, directives, staffing, deployment and training information.
- + Assessed the FPPD's organizational chart, command structure, mission, values and cultural environment.
- + Conducted two stakeholder focus groups.
- + Reviewed external reports and internal surveys including the Racial Equity Diversity and Inclusion (REDI) report, 2014 Cook County Forest Preserves law enforcement survey and customer satisfactions surveys.
- + Reviewed a summary of internal affairs, inspector general and FPPD cases and complaints.
- + Conducted interviews of numerous stakeholders, including:
 - FPDCC leadership
 - FPPD Chief Sylvester Bush and other command staff
 - FPPD sergeants
 - A random sample of FPPD officers
 - Two board members
 - REDI committee internal participants



Assessors: The Hillard Heintze Team

Hillard Heintze, a Jensen Hughes company, is one of the leading law enforcement and public safety consulting firms in the United States and the world. Since 2004, we have helped drive critical advancements in public safety at the international, federal, state and local levels that are changing how police departments view and execute their missions and collaborate with communities to keep residents safe and officers fulfilled and secure in their careers. In addition to guiding dozens of agencies, our team has helped foster the critical advancements in policing called for in the Final Report of the President’s Task Force on 21st Century Policing. We also served as the U.S. Department of Justice’s sole service provider for the Community Oriented Policing Services (COPS) Office Collaborative Reform Initiative for Technical Assistance. As subject matter experts, we developed the seminal U.S. Department of Justice COPS Office’s publication, “Law Enforcement Best Practices – Lessons Learned from the Field,” a guide for modern police reforms throughout the U.S. The biographies of the team members who contributed to this engagement are in **Appendix B**.



Key Findings

1. The Forest Preserves Police Department has a ready, willing and able workforce capable of helping transform the Department into a model police force.

Our interviews revealed the Forest Preserves Police Department (FPPD) officers understand, appreciate and take pride in the Department's mission to make the Forest Preserves a safe place. Although the officers enjoy many aspects of their jobs, such as working outdoors, all interviewees provided suggestions to improve the FPPD. The interviewees indicated they support efforts to improve the Department. District leadership has also demonstrated willingness to support efforts to improve the FPPD.

Although the FPPD faces some organizational challenges, through the officers' unique dual roles as ambassadors for the Forest Preserves District and public safety officers, they can improve upon and strengthen community relations, while also keeping the Forest Preserves safe.

2. Forest Preserves visitors generally have positive impressions of FPPD officers.

Surveys conducted by the District and our interviews and focus groups indicate that Forest Preserves permit holders and other stakeholders view the FPPD positively. Stakeholders offered some opportunities for the FPPD to improve its relationship with the community, but overall, they indicated that the officers are knowledgeable, professional and helpful.

3. The Racial Equity Diversity and Inclusion Committee's processes can serve as a starting point for organizational change within the FPPD.

The Forest Preserves District of Cook County's (FPDCC) Racial Equity Diversity and Inclusion (REDI) Committee promotes inclusiveness in the provision of services and employment to all Cook County residents. The Committee educates employees to practice racial equity in the workplace and trains employees on the importance of using an REDI lens when working so they can strengthen the organization from the inside out.³ FPPD representatives have participated in REDI in the past, and most recently three Department members volunteered to participate.

³ Forest Preserves of Cook County, *Promoting Racial Equity in the Forest Preserves of Cook County 2020 Annual Report*.



4. The FPPD needs to take action to effectuate change.

Although FPPD members enjoy many aspects of their jobs, they believe the Department has started but never fully implemented many initiatives. Several interviewees noted that the FPPD has surveyed and interviewed members many times over the last several years; however, the Department has not made any changes. Some interviewees shared that after the FPPD informs them of new or imminent projects or programs, they seldom received updates or any information about outcomes.

Our interviews revealed that leadership appears slow to change and unwilling to take risks or delegate tasks to other employees. In addition, members perceive leadership as demonstrating a lack of stewardship in seeing important projects through to completion.

5. The FPPD should provide input on the employment plan.

The FPDCC has a comprehensive employment plan. However, since its development and modification, the FPPD has traditionally not played a role in shaping those sections of the plan that specifically address the hiring and promotion of FPPD personnel.

6. The FPPD's recruitment efforts are limited.

The FPPD's recruitment efforts generally do not leverage existing relationships or create a broader, targeted candidate pool to attract candidates interested in the Forest Preserves' mission. Although the FPPD understands its mission to protect the Forest Preserves and make it a safe place for people to enjoy, this description does not clearly manifest itself in how the Department markets itself or describes its job positions.

7. The retention of officers, especially those newly hired, is a concern.

The FPPD has continually faced the challenge of retaining its officers, probably more so than other policing agencies in its region. The FPPD's salaries and benefits, in particular its retirement benefits, are lower than in area police departments.

An even more compelling challenge, however, is that officers often use the FPPD as a steppingstone to move on to other area police departments. Newly hired officers take advantage of achieving the FPPD's law enforcement certifications, principally academy training and experience, and leverage that to get a job with another police department. Although salaries and benefits are important considerations, improved opportunities and work conditions can significantly contribute to increased retention.



8. The FPPD must provide clear, consistent and documented communication.

The FPPD suffers from ineffective communication between command staff and those assigned to the field, as well as between command staff members. This lack of communication and inconsistent messaging creates a strong feeling of a “disconnect” between Department leadership and sergeants and patrol officers.

9. The FPPD’s policy manual is out of date and unorganized.

The FPPD acknowledges that its policy manual is out of date, and it is working with an outside consultant to update its policies. This appears to be a positive development; however, interviewees shared that FPPD leadership has indicated it is working on policy revision for a long time. A strong policy environment is essential to the proper functioning of a police department. The absence of policies and outdated policies create an environment in which employees are unsure of the agency’s direction and indicate management’s failure to provide proper guidance. This uncertainty contributes to low employee morale and retention problems and can impact court testimony in criminal and civil cases wherein the District is being sued.

10. Officers have limited opportunities for promotion to command ranks.

The promotion processes for deputy commander and commander positions have resulted in the FPPD hiring a disproportionate number of outsiders, which has impacted employee morale. These hires communicate to employees that they are not good enough to fill command positions. Hiring individuals for leadership positions who do not have the institutional knowledge or established long-term relationships with other Forest Preserves departments results in a lack of consistency in policies and programs and hinders the Department’s ability to implement long-term fundamental changes.

While most interviewees did not question the command staff’s experience and abilities, they indicated that the FPPD should make more efforts to promote from within. In addition, officers and sergeants perceive a lack of economic incentive to pursue a promotion as they would earn only minor increases in pay, could lose money due to fewer opportunities to work overtime and have less control over their geographic assignments. These concerns about promotions directly impact the FPPD’s ability to retain officers.

11. The FPPD’s internal affairs process is not timely or transparent.

A police department’s internal affairs function is a key mechanism for preventing and addressing misconduct, thereby helping maintain the agency’s legitimacy. Our assessment revealed that the FPPD routinely fails to adjudicate internal investigations in a timely manner. At least one case remained unresolved for 24 months from the initiation of the complaint.



Many employees do not understand the process for investigating internal complaints. While the FPPD has improved its internal affairs process recently, it is still not transparent or timely, which impacts officers' morale and their perceptions about the fairness of the process. Employees expressed a "lack of fairness" because the Department holds them accountable for three separate sets of rules: Cook County, Forest Preserves District and FPPD. They believe leadership "piles on" charges during the complaint process. Additionally, the FPPD page of the District's website does not describe the process for making a complaint against or commending a Department member.

12. The FPPD's training opportunities are limited.

Although the COVID-19 pandemic and understaffing issues limited training opportunities in 2020, FPPD members believe they have few opportunities to participate in training, such as the training offered by the Northeast Multiple Regional Training (NEMERT). The FPPD does not have a written training strategy that links training priorities to its strategic plan and performance management process. The Department also does not have a regular schedule of training opportunities to officers.

13. Sergeants do not feel valued.

First-line supervisors play an integral role within a police department as they communicate job expectations to the personnel who report to them. In addition, they translate leadership's vision, direction, message and intent into operational practice.⁴ FPPD sergeants does not believe that the FPPD solicits or appreciates their views and input on policy and operational matters. Soliciting input from sergeants and sharing command staff's rationale behind important policy decisions would help the FPPD create support for its philosophy and priorities and help members understand them.

14. The FPPD's equipment is often in poor condition and slow to roll out.

A common complaint from FPPD members was that the patrol vehicles are old and in poor condition. Additionally, they noted that some vehicles assigned to patrol do not have mobile data terminals that allow officers to download dispatched messages; search local, state and federal databases; or complete electronic reports. Although the officers appreciate that the District plans to implement a body-worn camera program and issue taser devices, they believe the time between the purchase of that equipment and its deployment in the field has been unnecessarily delayed.

⁴ Law Enforcement Best Practices Guide



Overview of Stakeholder Outreach

As part of our assessment, we conducted two small focus groups with stakeholders, mostly those who represent groups that frequent the Forest Preserves.

First Stakeholder Focus Group

Although many stakeholders shared positive statements regarding the Forest Preserve Police Department (FPPD) and that they have had good interactions with its officers, some group members shared negative interactions and instances in which officers were overbearing. However, these latter group members indicated that when they reported negative interactions to Department leadership, leadership handled it appropriately.

The focus groups discussed the FPPD officers' challenge to enforce the law while remaining friendly, as the Department's goal is to protect the safety of Forest Preserve visitors and the environment. For example, FPPD officers show up to events and write parking tickets for minor violations, rather than consider the bigger picture of safety and environment. Focus group participants suggested that officers spend more time in the groves to protect the environment, rather than remaining parked in their cars.

Stakeholders commented on the perceived lack of communication between District planning staff and officers assigned to an event. They believe if planning staff better informed officers of events, they would focus their attitudes and efforts to help make the events successful, rather than focus on writing tickets. Stakeholders believe that the officers should ensure a safe event by supporting organizers and making them feel welcome. This begins by providing officers with information about the event, to make them more enthusiastic about supporting it. This would include taking the time to meet with organizers. Although the focus group participants acknowledged that many officers already do this, they suggest that it be routine for all events. Stakeholders shared that, when acting as event organizers, their conversations with FPPD leadership are not always communicated to the officers who cover said events. Some shared that having a primary point of contact assigned to the same event each year would foster a more collaborative relationship between event organizers and FPPD officers.

We asked the focus group participants to identify ideal attributes of FPPD officers. Their answers included:

- + Adaptable to unique situations.
- + Acts as an ambassador of the Forest Preserves.
- + Willing to participate in event activities and spend time talking with event participants.



- + Adaptable, empathetic, respectful, and able to relate to others.
- + Understand the Forest Preserves' mission.
- + Clearly demonstrate their commitment to conservation.

The focus group participants said they would prefer if FPPD officers act as ambassadors of the Forest Preserve first and police officers last. They said officers should politely enforce the rules, rather than rely on their official authority. They believe officers should take a lighter hand in their interactions with visitors. The participants also suggested that Forest Preserve visitors, such as Friends of the Parks, can play a role in recruiting.

Although all members had an overall positive impression of the FPPD, they understood its need to improve and expressed a willingness to assist in that effort. For example, Forest Preserve visitors may be able to play a role in recruiting.

Second Stakeholder Focus Group

Near the end of our assessment process, we convened a second focus group that included some of the same participants as the first focus group, as well as some additional participants. We shared some of our initial findings and recommendations with these focus group members, who provided us with additional insight on other topics, such as transparency, policy review and stakeholder input. Like the first group, the participants were supportive of the FPPD. They shared that the FPPD should be more transparent about its activities. The participants made the following recommendations.

- + Publish and provide context for crime data from the Forest Preserves.
- + Publish data on how FPPD personnel spend their time (e.g., patrol, on trails, along waterways)
- + Create a transparent method to submit complaints and comments regarding the FPPD or individual officers.
- + Use the FPDCC website or other social media platforms to share the FPPD's history, what they do and why they do it.
- + Create an easy method to contact officers assigned to areas such as the Nature Center.
- + Be open and transparent by sharing information when critical or high-profile incidents occur in the Forest Preserves.



Focus group members also expressed an interest in stakeholder involvement in policy review efforts. They shared that, to provide real input in policy development, stakeholder involvement should start before the FPPD completes a policy. However, they acknowledge that identifying appropriate community members to be involved in policy review can be challenging because the Forest Preserves are spread across the county and not used by everyone. Despite that, focus groups members said involving stakeholders in policy review would increase the community's trust in the FPPD.

Stakeholders believe the FPPD can use the Racial Equity Diversity and Inclusion (REDI) model to assist the Department improve itself and its response to recommendations contained in the final report. Some participants stated that the FPPD should prioritize its internal issues before moving forward with an external initiative, such as the creation of a Citizen Advisory Board.

Stakeholders shared that external groups should have a role in the recruitment of FPPD officers and suggest this would broaden the Department's ability to recruit from communities of color. They stated that they would better support the FPPD's recruitment efforts if it described its efforts more thoroughly and differentiated itself from other municipal police departments, such as the Chicago Police Department. They believe that although the FPPD is proud of its distinct mission, that message is not getting out to the public.



Internal Culture and Organizational Climate

The internal culture of a police department can significantly impact how its officers deal with those they encounter. Internal procedural justice includes employee perceptions of the fairness of outcomes in their organization, the processes that leads to these outcomes and how the organization explains these processes and outcomes. Research show that, although correlated, these specific justice judgments are each predictive of work- and worker-related outcomes.”⁵

Procedural justice has been a topic of discussion in policing over the decade, with much focus placed on police interactions with the public. This view of procedural justice focuses on reinforcing police legitimacy, that is, the public’s perception that the actions of the police are legitimate and in the best interest of the community. Members of the public are more likely to willingly cooperate and work with police when they perceive treatment that is procedurally just.⁶

Internal procedural justice is a key factor. As the *President’s Task Force on 21st Century Policing* states, officers who feel respected by their organizations and believe that department processes are fair, are more likely to carry the same respect into their interactions with the community.⁷ We conducted our review of the FPPD’s internal culture through a lens of organizational justice, specifically focused on internal procedural justice.

+ KEY CONCEPT

Procedural Justice

Procedural justice as a theory is not new. It has evolved into four principles specifically geared toward law enforcement and the community:

1. Being fair in processes
2. Being transparent in actions
3. Providing opportunity for voice
4. Being impartial in decision making

Perceptions of the FPPD’s Internal Culture

Although we commend certain aspects of the FPPD’s internal culture, some concerns raised during our review process could impact employee morale. These, in turn, could negatively impact officer retention and the desire among officers to seek promotions or participate in work groups to address Department priorities. Most of the topics described below are consistent with the results of a survey conducted by the District in 2014 and the breakout session conducted with FPPD officers in 2018 as a part of the District’s cultural awareness program.

5 <https://www.oxfordbibliographies.com/view/document/obo-9780199828340/obo-9780199828340-0044.xml>

6 Law Enforcement Best Practices Guide, <https://www.hillardheintze.com/law-enforcement-consulting/cops-law-enforcement-best-practices-guide/>

7 President’s Task Force on 21st Century Policing. (2015). *Final report of the president’s task force on 21st century policing*. Washington, DC: Office of Community Oriented Policing Services.



Belief in the Mission

We asked interviewees of all levels of the FPPD what drew them to work for the Department. Most cited its mission statement to make the Forest Preserves a safe place for everyone to enjoy. They clearly understood and took pride in the mission. We also learned that the Department's mix of conservation and municipal police work attracted applicants. This is consistent with the results of its 2014 internal employee survey, in which 94 percent of the District's law enforcement officers indicated their awareness and understanding of the mission and purpose of the Forest Preserves. Its belief and commitment to its mission was further reinforced in a 2018 breakout session during the district's cultural awareness forum. We recommend that as the FPPD moves to implement our recommendations, especially those related to hiring, its leadership leverage those positive feelings about its mission.

Friendship and Camaraderie

Many interviewees expressed that sergeants and patrol officers get along well and support each other. They expressed that sergeants and patrol officers have a bond and "have each other's backs" when needed. This is supported by the 2014 survey results, in which over 93 percent of officers indicated that they had developed one or more quality friendships in the workplace.

Diversity

Our interviews revealed that FPPD officers are proud of the Department's diversity, noting that employees have varied experience and backgrounds and speak multiple languages. Interviewees indicated that the Department's diversity helps foster better community relations and positive interactions with the public. According to the Promoting Racial Equity in the Forest Preserves of Cook County 2020 Annual Report,⁸ prepared by the REDI Committee, the FPPD is more diverse than the overall diversity of the Forest Preserve District, as seen below.

⁸ The FPPD's makeup has changed slightly since the REDI report was completed.



2020 FPCC EMPLOYEES BY RACE OR ETHNICITY AND GENDER		
Race or Ethnicity	FPCC Workforce	FPPD
Asian	1%	2%
Black or African American	26%	32%
Hispanic or Latino	12%	19%
Hawaiian or Other Pacific Islander	<1%	1%
Two or more races	1%	0%
White, Not Hispanic or Latino	59%	44%
Other or Unknown	1%	2%

Gender	FPCC Workforce	FPPD
Female	34%	21%
Male	66%	79%

Despite its overall diversity when compared to District demographics, the FPPD sergeant rank is less diverse. Of the FPPD's 13 sergeants, 11 are white, one is Hispanic and one is Asian. The following table represents the FPPD's staffing as of March 1, 2021 and focuses on race and gender by rank.



FPDCC POLICE DEPARTMENT BY RACE AND GENDER AS OF MARCH 1, 2021							
Rank	White	Black	Hispanic	Asian	Total	Male	Female
Command Staff	3	3	1	-	7	5	2
Sergeants	11	-	1	1	13	10	3
Security Specialist	-	3	-	-	3	2	1
Patrol	31	20	18	2	71	60	11
Civilian	3	5	-	-	8	3	5
Sworn and Civilian Staff	49	31	19	3	102	80	22
	48%	30%	19%	3%	100%	78%	22%
Sworn Staff Only	46	26	19	3	94	77	17
	49%	28%	20%	3%	100%	82%	18%

This analysis indicates that the FPPD needs to address diversity among its sergeant rank to increase the rank's racial and gender diversity. We provide recommendations to improve the FPPD's promotions process later in this report.

Staffing

During our interviews, we learned that the FPPD is experiencing staffing shortages. For example, the Department is authorized to have 16 sergeants, but it has only filled 13 of those positions. Similarly, the FPPD is authorized to have 94 patrol officers, but it has only filled 71 of those positions. This understaffing results in supervisors often having to cover multiple areas and travel to opposite ends of the district to cover roll calls. Additionally, the First Deputy Chief position and a Deputy Chief position remain unfilled as of the date of our assessment. With these positions unfilled, Department leadership must prioritize the day-to-day operations, thereby missing the opportunity to develop and administer training and engage in strategic planning.

Officers shared that because of staffing shortages, they must cover larger areas and are concerned that backup may be too far away to respond to calls for assistance. Additionally, because they must cover larger areas and be ready to backup other officers, they are reluctant to leave their vehicles to conduct proactive activities, such as making positive public contacts, walking the trails or taking out a patrol boat. This is important as Action Item 4.2 from the Final Report of the *President's Task Force*



on *21st Century Policing* encourages police departments to evaluate patrol deployments to allow sufficient time for problem-solving and community engagement activities. The FPPD's staff shortage provides insufficient flexibility for its officers to engage in these activities.⁹ Additionally, the staffing shortage contributes to reduced morale and the feeling that the District does not about care the FPPD or its operational issues.

Desire for Change and Willingness to Assist

Almost all interviewees agreed that the FPPD needs to address some significant issues regarding communication, morale and retention. Many interviewees suggested improvements, including increasing the FPPD's social media presence and officer contact with the public. Although the interviewees are willing to help improve the Department internally, as well as its external relationships, many are concerned that change will not happen once our assessment concludes. They indicated that they have seen previous efforts to assess the Department or effectuate change, that were curtailed or failed to result in meaningful changes.

Inclusion and Equity

As indicated, inclusion and equity are key initiatives for the FPPD. The District's REDI committee initially included a member of the FPPD command staff; however, the command staff member left the committee and their seat remained open until recently, when three FPPD members volunteered to participate. The REDI committee works on the District's pilot projects, especially those focused on racial equity. To date, none of the REDI committee's initiatives have focused on the FPPD.

Considering the FPPD's size and the nature of its work, the District should consider creating a REDI committee project that focuses on the unique issues of the FPPD. Although interviewees did not share complaints about race-based inclusion and equity issues within the FPPD, many believe its organizational issues stem from its lack of inclusion and equity.

FPPD members at the rank of sergeant and below stated they believe the Department does not value their input and leadership neither solicits nor respects their views. They referred to inequities in how the FPPD distributes new equipment, such as vehicles. Additionally, they described inconsistencies in how the Department investigates allegations of misconduct, and the amount of discipline imposed. However, none of our interviewees indicated racial bias as the reason behind the inconsistencies. Rather, they attribute these differences to whether command staff looks upon an officer favorably.

⁹ *Final Report of the President's Task Force on 21st Century Policing.*
https://cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf



Regardless of whether these perceived inequities are factual or the actions are justifiable, the perception of unfairness has a significant impact on Department morale. As discussed below, FPPD officers complain that they receive inconsistent messages from command staff and often do not understand why the command staff makes some decisions. This lack of communication and understanding contributes to the perception of unfairness. Improving communications, and including sergeants and officers in decision-making when appropriate, could begin to address these issues.

Communication

Although communication issues are intertwined with inclusivity and equity, interviewees most frequently discussed issues concerning communication within the FPPD. When effective, communications by leadership motivates, inspires, trains and develops personnel while creating an organizational culture that promotes the department's goals and mission. The International Association of Chiefs of Police (IACP) recommends internal communication strategies including identifying goals and shared vision, being honest and transparent, actively listening, giving credit, mentoring personnel, and communicating in a variety of manners.¹⁰ Although emails and calls are efficient, communicating information during attendance at roll calls, informal hallway chats or while joining officers on patrol can better relay to personnel of all rank that the FPPD is all part of the same team.

During our interviews, we learned that communication between sergeants and patrol officers and among sergeants is generally good. However, there was a clear theme from all interviewees that the communication between sergeants and command staff, and between command staff members, is poor. Although the interviewees pointed to examples in which command staff members communicated well with sergeants and patrol officers, the general belief is that communication of command priorities is rare and inconsistent. Additionally, patrol officers rarely see command staff members. We learned that patrol officers learn of many decisions verbally, rather than through written directives. Interviewees reported that this results in inconsistent instructions, depending on the supervisor or command staff member who communicates them.

The FPPD formally communicates its expectations to officers through policy. During our interviews, we noted a common theme regarding the FPPD's policies, and how difficult and time consuming it is for officers to locate relevant policy for guidance. Some interviewees admitted that they turn to long-term employees to obtain institutional knowledge, rather than attempt to find the relevant directive or policy. Further, they shared that communication from the District itself is also poor. Although the interviewees understand the need to follow the directions of their direct supervisors and command staff, they indicated that it would be helpful if the supervisors and command staff better explained the reasoning for some decisions.

¹⁰ *Supporting Culture Change through Internal Communication with Officers and Civilian Staff*. International Association of Chiefs of Police. https://www.theiacp.org/sites/default/files/243806_IACP_CPE_Supporting_Culture_Change.pdf



Retention

One of the biggest issues expressed by FPPD members of every rank is the Department's inability to retain officers. Interviewees cited several contributing factors to its poor retention, such as policies in disarray, unreliable vehicles, limited promotional opportunities, poor communication, and poor pay and benefits. They specifically pointed to retirement benefits, which are often not competitive with nearby police departments. They also cited the general feeling that command staff do not appreciate the patrol officers and supervisors. Best practices to improve retention include increasing training opportunities, developing a recognition and award program, examining how assignments are distributed, assessing promotion opportunities, implementing mentoring programs, creating career development strategies, and seeking officer feedback.¹¹ We discuss retention further later in this report.

Leadership

Interviewees cited a "revolving door of leadership" as a significant concern. In recent years, the FPPD has had several chief and command staff turnovers. Constant change at the command-level makes it difficult to enact fundamental organizational change, and to address some of the issues we identify in this assessment. Additionally, leadership turnover impedes the important momentum needed to build larger and more meaningful changes. Some interviewees indicated that the lack of institutional knowledge regarding how the Department and the District operate stifles the FPPD's ability to grow and improve. They also referenced the FPPD's lack of relationships with other FPDCC departments.

Our interviews revealed another common theme – the FPPD must fundamentally change how it operates. However, while many interviewees acknowledged the need for change and seemed to understand what some of those changes could entail, we did not identify a sense of ownership of those who should enact the changes. Many interviewees seemed to suggest that it is someone else's responsibility to initiate and manage change.

Although change includes all levels of the organization, it needs to start at its top. Change can be difficult, and FPPD leadership needs to develop a thoughtful strategy to effect change and overcome some of its barriers to change including:¹²

- + **Loss of Control or Autonomy:** The interviewees revealed that decision-making in the FPPD is top-down, and sergeants and officers cannot make decisions or proactively develop projects to improve the Department or its relationship with the public.
- + **Loss of Face:** Individuals who have been in command staff for a long time may be defensive about a departure from the previous way of doing things.
- + **More Work:** Effecting fundamental change can take time. This concern is particularly acute given the FPPD's understaffing.

¹¹ Law Enforcement Best Practices Guide

¹² *Ten Reasons People Resist Change*. Harvard Business Review. <https://hbr.org/2012/09/ten-reasons-people-resist-change>



These barriers to change are predictable. FPPD leaders should understand them and implement strategies to overcome them such as giving ownership to those impacted by the change, acknowledging and celebrating what the Department has done well in the past and incorporating those things into a future vision, and recognizing those who make extra efforts to plan and effectuate change.

Training and Experience

A lack of training opportunities and inexperience in dealing with major issues can sometimes limit the opportunities to promote staff. Training programs develop individuals' interpersonal skills and improve their competence, communication techniques and confidence. The availability of training programs projects to personnel that the department cares about their future and wants to mitigate risk and improve their skills. External or joint training opportunities with nearby or regional law enforcement partners could build relationships between officers and colleagues in neighboring jurisdictions, which could in turn aid each agency achieve their objectives.

Large cases such as homicide could be challenging for the FPPD, as most officers have little training or experience in handling them. The Department has appropriately addressed this concern by contacting outside entities, such as the Cook County Sheriff's Office, to assist in its most serious cases. Officers expressed concern that they are provided the excuse of not being promoted due to lack of experience, when in fact they are not trained and thus cannot become experienced. The FPPD should ensure that a lack of experience in handling issues, especially ones that the Department outsources to other agencies, should not act as a barrier to promotion to command positions.

In the past, the FPPD scheduled officers for training conducted by Northeast Multiple Regional Training (NEMERT). NEMERT provides professional development to officers beyond annual in-service requirements. Officers shared that not all classes were directly relevant to FPPD's responsibilities or to a larger strategy. Participation in NEMERT has subsided in the past year, in part due to the pandemic. Command staff shared that they notify staff about class availability when NEMERT training becomes available. However, interviewees indicate that command staff has not regularly made them aware of these offerings. Officers shared that some of the trainings they must attend seem to be knee-jerk reactions to current news, rather than a part of a larger strategy.

Once the FPPD develops an overall strategic plan, we recommend it assign a training officer to address concerns about the availability of training and to ensure that training aligns with Department priorities. The training officer should be responsible for developing a training strategy consistent with the overall plan and for scheduling officers for training opportunities. The FPPD's overall strategic plan should include goals and measurable objectives to create training expertise for some of its highest priority training needs.



When developing its training plan, the FPPD should consider tapping into the expertise of Department members who are well equipped to provide training to fellow officers. In addition, the FPPD should consider enrolling officers in other train-the-trainer programs to allow officers to develop their expertise and provide additional in-house training. By creating a larger training corps within the Department, the FPPD can be more flexible and cost effective in delivering training to staff.

Policies

Policies set the foundation for all law enforcement agency's operations, establish uniform standards, set expectations, provide guidance, and protect officers and agencies. Best practices instruct that policies be comprehensive, clearly written and reflect the agency's philosophy.¹³ Law enforcement agencies should always involve their personnel in policy development and inform them of any changes to policy. The agencies should provide personnel training on policies and explain why policies exist. Policies should be 'living documents' and law enforcement agencies should conduct routine inspections and reviews to ensure they comply with all policies and that they are up to date. Finally, policy should incorporate best practices such as those developed by the IACP and CALEA.

The FPPD's policy manual is outdated and unorganized. Over six year ago, command staff members recognized the need to improve the FPPD environment and contracted with an outside police consultant to revise its entire policy manual. However, efforts to review and implement the recommended policies stalled. More recently, the Department assigned a deputy commander to review policies and revise the policy manual. This effort also involves a review by the deputy commander and Forest Preserves Leadership staff.

Outdated policies can have many consequences for a law enforcement agency. Because the policies do not reflect the latest laws and best practices, members cannot rely on them for guidance. Instead, they consult with other members or people from other law enforcement agencies. The FPPD's outdated policies also contribute to the inconsistent guidance officers reportedly receive from different command staff members. Additionally, the policies are not easily available to staff. The FPPD's outdated policies and lack of transparency creates risk management issues, in that policies may be inconsistent with current law. We suggest the FPPD prioritize creating a clear, up-to-date policy handbook to address most of these issues.

The FPPD should expand its processes for reviewing and recommending changes to policy beyond a deputy commander and District leadership to include one or more sergeants and patrol officers. These sergeants and officers are likely the most impacted by policy changes and can provide significant input on how recommended policy changes impact line staff and first-line supervisors. Because the improvement of its policies should be a high priority for the FPPD, the Department should consider assigning a deputy commander or other command-level position to have the sole responsibility for reviewing and finalizing the new policy manual.

¹³ *Developing a Police Department Policy-Procedure Manual*. International Association of Chief of Police.
<https://www.theiacp.org/sites/default/files/2018-08/BP-PolicyProcedures.pdf>



Equipment

Most interviewees noted that FPPD equipment is often outdated or in disrepair. The condition of assigned vehicles is of particular concern. Interviewees shared that vehicles are sometimes as much as 12 years old and often require repairs. Several also commented on what they perceive to be the inequitable distribution of vehicles. For example, the Department recently received new vehicles, but the North Region did not receive any new vehicles. Interviewees reported that nobody explained why that region did not receive a new vehicle. They also indicated that the FPPD should prioritize providing new vehicles to patrol officers rather than command staff.

Finally, officers noted that the Department purchased new equipment such as body-worn cameras and conducted energy devices (i.e., Tasers). However, they believe that the time between the purchase of that equipment and its deployment in the field was unnecessarily delayed.

Summary

The topics and issues noted above indicate that the FPPD needs to focus on improving its internal culture and morale. The Police Executive Research Forum recommends several methods to improve internal legitimacy including “creating meaningful and transparent paths for career advancement, ensuring that disciplinary systems are fair, and soliciting officers’ views about major issues of policy and practice.”¹⁴ The Department can increase morale by addressing internal issues that cause officers to perceive that they are not valued or respected. In turn, as officers feel they are respected and treated fairly, they can take more pride in their work, understand and comply with priorities and policies, and become more likely to practice external procedural justice.

Practices to Improve Internal Culture

Addressing concerns about the FPPD’s culture requires a multi-faceted approach. Our interviews of FPPD personnel indicate most of its members are willing to contribute to its improvement and its culture. However, the Department must solicit and respect their views, and members must have the confidence that the FPPD will follow through on identified initiatives. The REDI initiative provides a good foundation and processes for including personnel in the FPPD’s improvement. Three FPPD employees recently volunteered to participate in REDI. The Department should take advantage of their participation by including an FPPD-specific project as part of the REDI initiative.

¹⁴ *Legitimacy and Procedural Justice: A New Element of Police Leadership*. Police Executive Research Forum (2014). https://www.policeforum.org/assets/docs/Free_Online_Documents/Leadership/legitimacy%20and%20procedural%20justice%20-%20a%20new%20element%20of%20police%20leadership.pdf



The FPPD should renew and improve its efforts to recruit patrol officers, as understaffing is a significant issue that impacts morale. Although the FPPD's demographics indicate that it is more diverse than the District overall, it should still focus its efforts on diversifying its workforce even more, particularly within the sergeant rank. As the FPPD becomes more fully staffed and diverse, more opportunities for diversifying the first-line supervision staff will arise.

The culture of the FPPD is influenced in part by the direction provided by its command staff, or in this instance, the lack of clear and consistent direction regarding the Department's priorities. To address this, the FPPD should revisit its strategic plan, develop a written policing strategy and timetable, and assign personnel to implement the recommendations made in this report. The development of the policing strategy should involve all ranks of the FPPD and include community input. Involving all ranks adds value to the planning process as patrol officers have a perspective from their day-to-day work that may be different from the command staff's perspectives. Additionally, when officers are involved in the process, they are more likely to embrace and support the eventual strategy.

In addition to developing a strategic plan, the FPPD should accelerate the adoption of its new policy manual. As indicated, the lack of an up-to-date policy manual creates uncertainty among sergeants and patrol officers about processes and creates legal risk for the District. Just as with its strategic plan, the FPPD should involve all ranks in its policy review process. This will relieve the burden on the sole command staff member currently responsible for the policy review and create the opportunity for officers to participate and feel valued.

Finally, the FPPD should increase face-to-face interaction between the chief and command staff members and the sergeants and patrol officers. This requires an intentional strategy for all command staff to regularly attend roll calls during different shifts, including on weekends. Scheduling this regular interaction allows officers and sergeants the opportunity to speak directly with command staff, even those who are not in their direct line of supervision.



Organizational Assessment

Police Community Relations

Current Practices

Leadership at the Forest Preserves surveyed people who booked permits for outdoor events between 2016 and 2019. The surveys asked respondents to rate the FPPD on the following attributes:

- + Knowledge
- + Professionalism
- + Approachability
- + Helpfulness
- + Friendliness

The FPPD officers received positive ratings each year, ranging from 4.1 to 4.5 on a five-point scale. A score of four was considered “very good,” and five was “excellent.” Ratings from younger respondents (ages 21 to 34) were slightly lower than those from older respondents. Officers who needed to enforce FPPD rules received lower ratings.

These survey results are consistent with the information the stakeholder group and other interviewees told us. Interviewees stated that the FPPD officers do a good job overall. However, at times, they overemphasize minor enforcement issues, such as parking violations. In some instances, officers did not explain why they were issuing violations. Interviewees suggested that officers focus on larger issues concerning the Forest Preserves.

Several interviewees expressed concern about the Caldwell Woods incident, in which an FPPD officer allegedly did not act while an individual harassed a woman for wearing a shirt displaying the Puerto Rican flag. Although this incident contributes to criticisms of the FPPD, interviewees noted few negative interactions between the FPPD officers and the public. They mostly had positive impressions of the Department overall.

As indicated, stakeholders suggested the FPPD officers communicate with the permit office to improve their relationship, allow officers to gain a better understanding of event goals and enable them to reach out to organizers on event days. With increased event knowledge, officers can better assist event organizers and participants and ensure event safety.

The Forest Preserves has many volunteer programs. The FPPD operates the Trail Watch program, which enhances community involvement. The program recruits and trains volunteers to serve as the eyes and ears of the FPPD.



The Forest Preserves Board of Commissioners adopted the Ten Shared Principles, which is another positive community relations development.¹⁵ These principles are the result of a joint initiative between the Illinois Association of Chiefs of Police and the Illinois NAACP to guide the relationship between law enforcement and the community. Adopting these principles, initiating the REDI committee, providing implicit bias training and instituting body-worn cameras, are positive steps toward improving accountability and community trust.

Improving Community Trust and Engagement

Developing a Strategic Plan and Leveraging Current Initiatives

Adopting the REDI initiative and Ten Shared Principles is a positive step for the District and the FPPD. However, these steps alone are not enough to develop positive relationships with the community. The FPPD must institutionalize these principles. Although the FPPD maintains a good relationship with the community, it has not developed a more comprehensive and purposeful approach toward community engagement. The Department should adopt a written community policing strategic plan that implements the concepts in the Ten Shared Principles, including:

- + Dignity and respect
- + Rejecting discrimination
- + Building and rebuilding trust
- + Procedural justice
- + Community policing
- + Ongoing relationships with the community

The written strategy should include steps to ensure the FPPD implements the Ten Shared Principles in a way that enables its officers to feel they are treated justly and fairly, as well as ensure they treat members of the public with the same courtesy. The plan should include specific, measurable, achievable, realistic and timely objectives to achieve the Department's goals.

Organizational Transformation

To truly improve its trust and engagement with the community, the FPPD should adopt community policing and procedural justice as guiding principles. Every time an officer of any rank interacts with a member of the public, they have an opportunity to create a positive experience. In addition to a community policing strategy, the FPPD should record positive contacts and incorporate them into performance reviews to further encourage officers to make positive contact with the community.

¹⁵ <https://fpdcc.com/forest-preserves-police-commitment-to-our-community/>

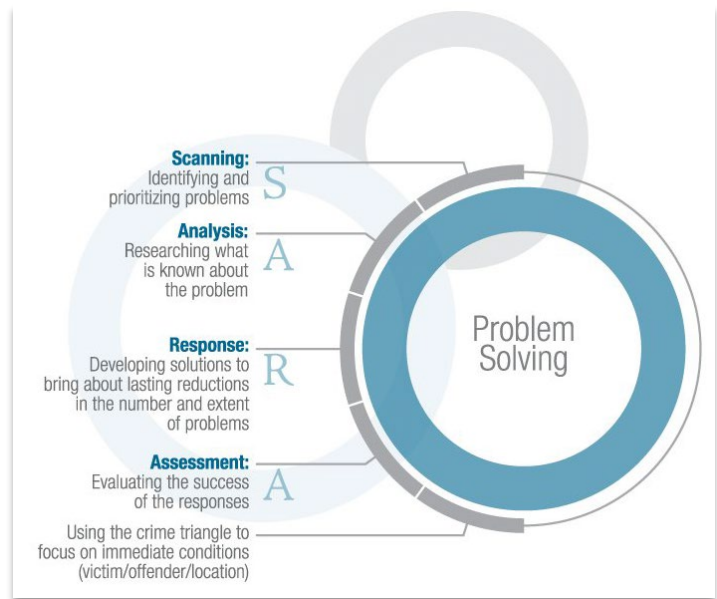


Performance reviews should focus, in part, on how individual officers engage with the community and incorporate community policing into their daily work. As indicated earlier, current understaffing cuts the amount of time officers have to spend on engaging the community and impedes positive community interactions. The FPPD should prioritize filling vacant patrol officer positions to combat this. The FPPD should conduct more focus groups and formal and informal surveys to solicit continual feedback from the public regarding its performance and to further measure community engagement.

Problem Solving

Using problem-solving techniques is one of the key elements of community policing.¹⁶ All officers should complete training in and be encouraged to problem-solve with community members. For community policing, we define problem solving as proactively and systematically examining problems to develop and evaluate effective responses.

The SARA model is a common problem-solving technique in policing.^{17 18} The FPPD leadership should consider encouraging officers or sergeants to apply problem solving to persistent issues in the Preserves.



The SARA Model

Developing and Enhancing Partnerships and Programs

Developing community partnerships is another key element of community policing. Many of the problems police officers encounter require more complicated or multidisciplinary approaches than simply making an arrest. For example, the FPPD cannot singlehandedly solve the issue of homelessness in the Forest Preserves. However, officers can partner with service providers in the community that can provide shelter or other services, such as mental health assistance.

¹⁶ *Community Policing Defined*. Office of Community Oriented Policing Services. U.S. Department of Justice. <https://cops.usdoj.gov/RIC/Publications/cops-p157-pub.pdf>

¹⁷ <https://popcenter.asu.edu/content/sara-model-0>

¹⁸ Graphic sourced from the DOJ COPS Office



As noted earlier, the Trail Watch program is a partnership that enhances community involvement and broadens the FPPD's efforts to improve public safety. The program helps strengthen relationships between the officers and regular Forest Preserves visitors and provides a friendly presence in the woods.

Several stakeholder groups said they will partner with the FPPD to address issues in the Forest Preserves and to increase community engagement. The FPPD should take advantage of these opportunities and increase its partnerships with the community. For example, leadership might consider developing a stronger partnership with the Conservation Corps, which provides hands-on experience to "school youth and adults each year to restore natural areas for the benefit of Cook County's plants, animals and people."¹⁹ The Conservation Corps participants are from diverse communities, including those with barriers to employment. Partnering with the Conservation Corps provides an opportunity for the FPPD to develop trust and relationships with community members who are interested in conservation and related fields. Additionally, the Conservation Corps volunteers can serve as a recruiting pool of diverse police officer applicants.

The District conducts multiple programs for community members. The FPPD should work with other Forest Preserves departments to identify programs in which officers can participate.

Interviewees cited examples of how FPPD officers could make additional positive contacts with the community if the officers had enough discretionary time. These examples included increasing officer involvement at the nature centers, and participation in programs such as hiking with youth, fishing with a cop, and pizza with the police.

Finally, the FPPD should regularly hold in-person or virtual community forums to gain key stakeholders' input. These forums would allow stakeholders to comment on FPPD activity and priorities and identify potential problems. For example, at the start of picnic season, the FPPD could have a meeting with permit holders to discuss the Forest Preserves rules and keys to hosting a safe and successful event. This would also be an opportunity for the permit holders to discuss their concerns. The FPPD could also hold a meeting with permit holders after the season to debrief on what went well and what could be improved.

Increasing Transparency

Creating a culture of transparency is one of the Pillars of the "President's 21st Century Policing Report." Action Item 1.3.1 of the report states: "To embrace a culture of transparency, law enforcement agencies should make all department policies available for public review and regularly post on the department's website information about stops, summonses, arrests, reported crime and other law enforcement data aggregated by demographics."

¹⁹ <https://fpdcc.com/nature/conservation-corps-programs/>



Although the FPPD leadership continues to update policies, the current policies are not posted online, data is not readily available, and the website includes minimal information on the Department. Additionally, the FPPD does not have a dedicated social media presence. The FPPD should post its new policies on the FPPD section of the Forest Preserves website as they are adopted. Although this alone would hugely increase transparency and community trust, the FPPD may want to consider inviting public input on its policies. The Department should also consider posting aggregate data on stops and other police activity, and leadership should regularly publish aggregated information about complaints against employees.

Finally, progressive police departments have become adept at using social media to share information with the public, develop dialogues with community members and brand the department. Not only would this help develop positive relationships with the community, but it could also draw potential applicants to a career with the FPPD. In the past year, the FPDCC has been posting positive stories about the FPPD on its social media pages and sharing these stories in its newsletter.

Aligning Training with Community Engagement

Adopting an overall philosophy of community policing, community engagement and procedural justice requires training to ensure that officers have the necessary skills. Although many officers may naturally take to community policing or might have participated in previous community policing training, the FPPD should provide training consistent with the Department's strategic plan.

As noted earlier, the FPPD has recently provided limited training and the training is not necessarily associated with an articulated strategy or with Department policies. We commend the FPPD for recently providing implicit bias training, as this is a key training topic that provides the awareness and skills officers need to identify and overcome their own implicit biases. Other training topics that can be important to community policing and building trust include:

- + Community-oriented policing
- + Problem- solving
- + Leadership
- + Addiction
- + Cultural diversity

These are just a few examples of training topics to enhance officers' skills. The FPPD leadership should use the Department's formal community policing strategic plan to identify and drive training priorities.



Recruitment, Retention and Promotion

Recruitment, retention and promotion are key to effective policing, organizational efficiency and positive police-community relations. Challenges typically arise when these human resources objectives do not align with a department's strategic plan.²⁰ Employees are more likely to perform their jobs well and remain with an agency when its culture allows them to pursue their interests, capitalize on their strengths and have input in the Department's decision making.²¹

We reviewed the FPPD's hiring and promotion process and its efforts to retain employees, and we compared them to best practices in policing. As noted earlier, the FPPD only has 74 of the 94 authorized patrol positions filled. Additionally, only 13 of the 16 authorized sergeant positions are filled. The FPPD must explore the process for hiring and promoting and ensure it is efficient and effectively assists in hires and promoting the most qualified and diverse candidates.

Current Practices

An employment plan primarily guides the Forest Preserves employee recruitment and promotion. This plan applies to all District employees, applicants and candidates, except those in exempt positions. Exempt positions for the FPPD include Chief of Police, the First Deputy Chief and Deputy Chief of the Department. Section 3A of the plan declares the District's commitment "to implement pro-active and transparent employment-related policies, practices and procedures that will prevent and remedy the negative effects of Unlawful Political Contacts and Unlawful Political Discrimination as required by the SRO (while in effect)²², Executive Order²³, Consent Decree²⁴ and Ordinances."

The plan includes the following sections: General Principles and Commitments Applicable to District Hiring, General Hiring Process, Exceptions to the Hiring Process and the Hiring Process for Sworn positions. According to Section VI of the plan, with limited exceptions, the District follows the hiring process described in Section VIII when filling a sworn position. For the purposes of Section VIII, the FPPD's non-exempt sworn positions are patrol officer, sergeant, deputy commander and commander. The process for hiring patrol officers and sergeants differ. The process for hiring deputy commanders and commanders is the same.

20 Law Enforcement Best Practices Guide

21 Wilson, et al., *Police Recruitment and Retention for the New Millennium*

22 The Supplemental Relief Order for the District agreed to by the Board on January 13, 2009, and approved on March 5, 2009, in the Shakman Case.

23 Executive Order 200901 signed by the President on April 1, 2009

24 Consent Decree Between the plaintiffs and the District in the Shakman Case entered into in 1994 and incorporating the 1978 Consent Decree between the parties.



Recruitment

The general hiring process section of the employment plan describes recruitment. The plan's recruitment processes are in place to ensure that the Human Resources Division takes "steps to assure that all recruitment efforts are conducted in a manner that maximizes the pool of applicants and avoids Unlawful Political Contacts or Unlawful Political Discrimination." The Plan includes a process for posting job openings and a provision for training employees who engage in recruitment activities. The provision notes that although employees may participate in a variety of events, they must provide written notice that the District does not hire or accept recommendations for non-exempt positions based on political reasons or factors.

Research indicates that interest in pursuing policing careers has decreased. Reasons for this include strained relations with and distrust of law enforcement, which high-profile incidents and recent protests can exacerbate. This creates challenges for police agencies interested in recruiting a diverse workforce. Successful agencies develop comprehensive recruitment programs based on a written recruitment strategy that includes leveraging partnerships and relationships to broaden the applicant pool.

After identifying potential candidates for employment, progressive departments assign someone to assist candidates as they move through the application process. This helps candidates understand how to be successful in the testing process and demonstrates that the agency that cares about them. This could lead the candidate to a more long-term commitment to the department, if hired and may be an effective practice for the FPPD. Leadership should consult the employment plan to ensure this process would not violate restrictions.

In 2018, a District employee developed a thoughtful memorandum on retaining FPPD officers. The recommended approach focused, in part, on ensuring that the Department's recruiting efforts led to hiring officers who would be likely to see the FPPD as a career choice rather than a mere steppingstone to other law enforcement jobs. The memorandum suggested that FPPD recruitment efforts focus on the unique aspects of the Department and reach out to individuals in environmental and conservation fields. However, our understanding is that the Department did not commit the time and resources needed to implement these recommendations. The following are candidate pools from which leadership should consider hiring.

The Conservation Corps

According to the Forest Preserves District's website, the "Conservation Corps programs provide paid, hands-on experiences to participants from across Cook County's diverse communities – including those with barriers to employment."²⁵ The FPPD should tap into the Conservation Corps as a potential recruitment pathway.

²⁵ <https://fpdcc.com/nature/conservation-corps-programs/>



Leadership can also develop a concurrent Police Explorer program to promote conservation protection and enforcement. This program could acquaint youth (ages 14 to 18) with the FPPD's specialty policing and foster their interest in working in an environment that offers a different policing experience. The program should take the Forest Preserves' inclusion and diversity values into account, reach out into diverse communities and promote a pathway for diverse candidates to get into conservation protection and enforcement academic arenas.

By working with the Preserves' Resource Management Department, which operates the Conservation Corps Program, this partnership would give FPPD recruiters access to a broader community with specific interest and investment in the Forest Preserves. Interviewees informed us that although they have hired officers through the Conservation Corps, the FPPD has not taken this on regularly.

Conservation Higher Education Programs

The FPPD should collaborate with the Preserves' human resources department to reach out to and build relationships with academic institutions that offer specialty degrees in conservation preservation and protection and that offer conservation law enforcement certification. Examples of these institutions include Southern Illinois University; University of Wisconsin - Stevens Point; Central Lakes College in Brainerd, Minnesota; and Vermilion Community College in Ely, Minnesota.

Other Recruiting Opportunities

Other Forest Preserves stakeholders, such as the Friends of the Parks, have expressed an interest and willingness to assist the FPPD with recruiting. The FPPD should also consider identifying where other conservation law enforcement agencies, such as the U.S. Park Service and the Illinois Department of Natural Resources (IDNR), find and recruit candidates.

The FPPD should emphasize the unique aspects of serving as an FPPD officer, rather than relying on a conventional police job description. Although emphasizing the different characteristics and job skills needed to serve as an FPPD officer might narrow the candidate pool, it would also help the Department focus on individuals who would find the work interesting and rewarding. The FPPD should consider developing job descriptions with the input of some of the Forest Preserves' key stakeholders. The following are some of the attributes external stakeholders identified as important traits of a successful FPPD officer:

- + Adaptable in unique situations.
- + Love of nature and desire to interact with people.
- + Willingness to serve as ambassadors for the Forest Preserves.
- + Be understanding first, and be police when necessary.
- + Empathetic, respectful and relate to others.
- + Understand and embrace the mission of the Forest Preserves.



- + Willing to participate in Forest Preserves activities.
- + Clear and demonstrable commitment to conservation

Rebranding the Department

Until recently, the FPPD had billed itself as a police department. The Department has not emphasized the specialties that differentiate it from typical police departments. In its last job posting, the FPPD identified its role in conservation preservation and enforcement as one of its key responsibilities. There has been a push to position the Department as a specialty niche in policing, which would redefine the Department's role and mission.

Like the Illinois Department of Natural Resources' Conservation Police, a title which emphasizes their unique role in policing, the FPPD should specify its identity and market itself with a clearer understanding of the desired attributes of its officers. The FPPD has many responsibilities in addition to basic policing functions, including a critical role in supporting the public's use of the Forest Preserves, preserving and protecting environmentally sensitive wildlife and lands, conservation enforcement, and supporting other Forest Preserves operations. Social media posts and other recruitment efforts can help promote this new initiative to focus on recruiting appropriate candidates.

Hiring

The FPPD must follow the general hiring process when filling positions in the District. The District has additional requirements for hiring sworn personnel. For patrol officers, the process is as follows:

- + Human resources posts the vacancy. Vacancies must be posted for a minimum of 30 days and include the timeframe from the date of application to when the applicant must complete the written examination, the study materials the test provider recommends, administrative fees and the passing score.
- + Human resources creates lists of individuals who meet the criteria specified for the positions and are eligible to be hired.
- + The FPPD holds an information session for select applicants.
- + Eligible applicants take a written examination.
- + Eligible applicants complete the interview process and then polygraph testing.
- + Candidates are selected and given contingent offers.
- + Once a contingent offer of employment is made, candidates take the following tests and exams and pass a background check.
 - Psychological exam
 - Drug and medical testing



- Peace Officer Wellness Evaluation Report (POWER) Test, which measures whether a police recruit meets the physical fitness standards required to undergo the physical and academic demands of the police academy.

The candidates selected for the open positions must attend a police academy if they are not already certified as a law enforcement officer by the Illinois Law Enforcement Training and Standards Board (ILETSB). The FPPD process for hiring officers is consistent with hiring processes in other police departments. The FPPD uses a third-party testing service to administer portions of the test. We recommend continuing this practice because it saves the costs of updating and administering tests. Additionally, it allows the FPPD to use already validated tests and it frees up internal resources to spend more time on recruiting.

Although the third-party testing service provides an exam that is validated for police officer positions, the Department should continue to ensure the exam is linked to the FPPD's special circumstances. For the written exam and the interview phases, entry-level testing should only identify the knowledge, skills and abilities that will enable the applicant to become a successful FPPD officer.²⁶ The tests need to be validated for specific FPPD requirements, as the duties of the FPPD are distinctly different from those of a municipal police department.

As mentioned, the Forest Preserves has a comprehensive employment plan. However, the FPPD has not participated in the subsequent edits the plan has undergone, in particular those sections that address hiring and promoting policing personnel. The plan can be modified to meet current circumstances, adjust to changes to FPPD officer job requirements or improve recruiting. The FPPD's command personnel should be involved in this process to offer their unique perspective and in-house expertise.

The FPPD administration and the Forest Preserves' human resources department should examine the employment plan to identify unintentional or unanticipated obstacles and barriers that may otherwise eliminate qualified candidates. The employment plan should place greater emphasis on the skills, knowledge and abilities of potential candidates who possess the characteristics and abilities that lend themselves to serving as a conservation protection and enforcement officer. The FPPD and human resources should also consider plan modifications to address the order of the hiring process steps. For example, some departments schedule the POWER test much earlier in the hiring process to ensure that candidates meet certain physical requirements before they make an offer. This also reduces time spent on other phases of the hiring process if the applicant cannot pass the fitness requirements of the POWER test.

²⁶ *Recruiting & Retaining Women: A Self-Assessment Guide for Law Enforcement*. National Center for Woman and Policing. <https://www.ojp.gov/pdffiles1/bja/185235.pdf>



Promotions

The FPPD has 13 sergeants, but it has three vacant sergeant positions. The process for hiring sergeants is shorter than the patrol hiring process:

- + Human resources posts the vacancies.
- + Applicants take the written exam.
- + A third-party professional assessment center recognized in the law enforcement industry assesses the candidates.
- + A three-member panel of District Management employees interviews and scores the candidates.
- + The candidates are placed on the eligibility list in ranked in order from highest to lowest score.
- + Vacant positions are filled from the eligibility list.

The FPPD posts job vacancies for external applicants to apply for sergeant positions. For the most recent sergeant's exam, only six of the eligible FPPD members applied for the promotion, and none passed.

Like the patrol officer hiring process, the FPPD works with a third-party testing service for the sergeants hiring process. We recommend continuing this practice, as the third-party provider validates the written exam and identifies candidate assessment tools and interview questions to ensure candidates have the desired skills and qualities.

The employment plan does not provide much guidance on the hiring process for commanders and deputy commanders. It states that before creating an interview list, a third-party assessment center that specializes in assessing candidates for promotion or high-level public safety positions must assess the candidates on the Validated Eligibility List for a Sworn Commander Position. The District places only the top three candidates, as ranked by the assessor, on the interview list.

The plan provides general guidance on the interview process, but it does not provide specific guidance regarding the questions that interviewers should pose to candidates. As noted, a large percentage of FPPD commander and deputy commander hires are external hires. It is unclear if this is due to a limited number of internal candidates or to internal candidates not performing well during the assessment conducted by the third-part assessment center.

Although improving the internal culture may increase the number of command position candidates, the FPPD should review the assessment center criteria to determine if it sufficiently evaluates the skills and traits of a successful FPPD officer.



Although the content of the written examination and exercises for the position of sergeant are not specified in the employment plan, each phase of the promotion process should evaluate and assess the specific skills; knowledge; and, in the case of the assessment center, abilities to determine if the candidate possesses the necessary skills. The same holds true for the assessment evaluation to identify eligible candidates for deputy commander and commander.

The FPPD does not provide specific feedback to employees regarding how they fared during the promotion process. The hiring officers should provide transparent feedback for the candidates on where they excelled and what they can work on. Additionally, candidates and hiring officers should think of the promotion process as a learning experience, not a method for ranking candidates. When a Department member understands their strengths and weakness, they can work to improve the weakness for the next promotion exam. Additionally, providing this feedback also offers a mentoring opportunity for aspiring sergeants and deputy commanders to assist officers in improving their chances for promotion.

We heard from many interviewees that there is little interest in promotions to sergeant and command ranks. Interviewees indicated that, in some instances, openings are announced shortly before the exam date, which makes it difficult to prepare. In addition, sergeants and other ranks told us that employees can make more money as a sergeant who earns overtime than as a deputy commander and that the pay difference is not significant enough to take on the increased responsibilities. Finally, many officers feel somewhat disenfranchised from the Department because of the way they are treated and question why they should take on any promotional opportunities.

For the past several years, the promotion process for deputy commander and commander positions has resulted in mostly external hires. In fact, only one person in the command ranks has served as an FPPD officer or sergeant. Many sergeants believe that it does not make sense to apply to those positions because only external candidates are selected. Primarily selecting external candidates signals to employees that their day-to-day work does not prepare them to serve as leaders in the organization. This results in the lack of interest in the positions and the disconnect between sergeants and command staff.

Retention

The FPPD invests substantial amounts of time and money in hiring and training officers. It is important that they also work to retain officers and show them why they should buy in to the agency's mission. Internal procedural justice fosters a positive work environment and improves job satisfaction and retention.

As discussed earlier, identifying and recruiting individuals who best fit the FPPD's desired culture is the first step to officer retention. After offering a position to a candidate, the FPPD leadership should assign a Department member to mentor the recruit during the academy training program. This effort will foster the candidate's success in the academy and in transitioning to the Department. Candidates will be more willing to join the FPPD and more motivated to stay if the Department demonstrates its



interest in their success. The FPPD leadership can also provide quality training throughout an officer's tenure and encourage officers to participate in training opportunities to demonstrate their interest in the officers' success. This, in turn, can help with retention.

One factor impacting retention is the FPPD's inability to offer competitive salary and benefits. The FPPD leadership told us about instances when they hired officers and trained them, but officer then joined another local police department. We did not conduct a salary analysis, but we do recommend that the FPPD leadership conducts regular reviews of salary, retirement and other benefits to ensure they are as competitive as possible within their budget restraints.

When conducting this analysis, leadership should consider the FPPD mission differs from that of a traditional law enforcement agency. For example, the conservation mandate and geographically dispersed preserves pose challenges unique to the FPPD officers. As such, leadership should consider developing a graduated pay scale that incorporates certain certifications unique to conservation protection and law enforcement. This would achieve two objectives: it would enhance the specialized skill set of the workforce, and it would bring officers who wish to pursue those certifications into a higher pay level, thereby establishing a career path within the Department.

Although salaries and benefits are important, employees are more likely to perform their jobs well and remain with an agency if the agency culture allows them to pursue their interests, capitalize on their strengths and offer input in decision making. Research shows that organization health, policy and culture are powerful predictors of employee turnover.²⁷

As noted, interviewees across ranks in the FPPD indicated strong concerns about its health and morale. These concerns include issues with communication, lack of clear written policies, and the employees feeling that command staff does not respected them or value their input. Understaffing contributes to these concerns. Interviewees indicated that they feel overstretched and not fully integrated into the organization.

Addressing these factors is a key strategy to improve officer retention and increase overall organizational effectiveness.

Integration into the Forest Preserves Culture

Some within the Forest Preserves organization feel that the FPPD is not as fully integrated into the organization as it could be in comparison to other Forest Preserves District departments. The District should consider developing a process to further integrate the FPPD into the larger organization. Creating stronger collaborative relationships with other Forest Preserves operations will:

- + Help the FPPD officers create a stronger identity and sense of indispensability in the organization.
- + More closely align the FPPD's mission with that of the Forest Preserves.

²⁷ *Police Recruitment and Retention for the New Millennium*



- + Incorporate and enhance the officers' role as Forest Preserves ambassadors.
- + Enable officers to feel like an invaluable component of the Forest Preserves organization.

Special Assignments

Employees want to enhance their skills to prepare them more effectively for promotion. To do so, the FPPD may consider creating a special enforcement or investigation unit to liaise with the Resource Management Department and carry out higher-level investigations related to conservation protection and enforcement. This would provide officers with additional experience that can be helpful in improving their chances for scoring well on promotional exams. Members could liaise with the Illinois Department of Natural Resources on matters within their jurisdiction. Aside from enhancing liaison capability and building stronger collaborative relationships, this unit would provide another career pathway for the FPPD officers. This unit should offer rotational assignments, which would allow officers to build stronger competencies and provide broader perspective on this aspect of conservation protection and enforcement.

Accountability and Complaint Investigations

Current Practices

Internal Affairs

When an officer or member of the public accuses a police officer of misconduct, the Internal affairs (IA) unit performs a thorough, fair and objective investigation. If IA sustains an allegation, the case moves on to a separate adjudication process to determine discipline. These outcomes can range from documented oral counseling to termination of employment. There are several ways police departments handle complaints; best practices include establishing formal policies and procedures for intake of complaints, investigation, adjudication and disposition.

In reviewing the FPPD IA, we considered these best practices, reviewed the FPPD policies and interviewed stakeholders. We learned the IA process is a source of frustration among the FPPD officers. The time between the complaint intake and clearance or disciplinary ruling is a major source of conflict that is disruptive to internal procedural justice.

Procedural justice is arguably one of the most talked about concepts in police reform and has been the subject of progressive reform efforts, trainings and best practices. Four principles of procedural justice have recently emerged that are geared toward law enforcement and communities. They include fair processes, transparent actions, providing opportunities for community input and impartial decision making.



As procedural justice is important to police officers' interactions with the community, internal procedural justice is important to how police employees feel they leadership treats them. Internal procedural justice refers to whether officers believe leadership treats them with dignity, fairness and respect and if they are transparent.

Understanding the impact of the IA process on internal procedural justice is key to police-community relations. When officers operate in a procedurally just environment, they are more likely to practice its key tenets with community members. A fair IA process ensures that investigations are completed in a timely manner and that officers receive administrative due process during the investigation, adjudication and disposition. When complaints remain unresolved for longer than necessary, personnel might believe they are not a priority. Often, their work status is unfairly impacted.

Intake

Best practice dictates that police departments should accept all complaints from any source. When the community and the department employees view the department as having integrity, IA investigations are of paramount importance. When a member of the community makes a complaint, it demonstrates that they trust the department to listen and fairly investigate. Although the FPPD website includes a phone number for citizens to report their Americans with Disabilities Act requests or complaints, it does not have a phone number to report other positive comments or complaints directly to the Department. However, the Forest Preserves website includes an online form and a phone number through which individuals can submit a comment to and direct the comment toward a Forest Preserve department, including the FPPD.

Between 2014 and 2020, the Forest Preserves recorded almost 700 comments that were directed to the FPPD through the website. The majority of the comments related to the 2018 Caldwell Woods incident, nearly 50 were complaints about officer behavior, 23 were positive comments about officer behavior and the remainder were general questions or neutral comments. The Forest Preserves forwards those comments and complaints to the FPPD for review and follow up. The FPPD should consider adding a link to its portion of the webpage to accept complaints and comments about the Department.

The FPPD has promulgated policies and instituted practices regarding intake of misconduct complaints. When citizens make complaints concerning the FPPD to the Forest Preserves complaint phone number, the complaint is forwarded to the FPPD and entered into the Department's tracking system, and a commander reviews it and assigns appropriate follow-up. If a citizen makes a complaint to FPPD personnel, the employee reports it to their supervisors and enters it into the Department's tracking system, and a commander reviews it and assigns appropriate follow-up. Officers make internal complaints to supervisors and enter them into the Department's tracking system, and a commander reviews it and assigns appropriate follow-up.



The FPPD General Order 04-006, Internal Affairs Section, governs the administrative investigation of misconduct complaints. It specifies, “It is the policy of the Forest Preserves District of Cook County’s Police Department to investigate all complaints of alleged employee misconduct in a timely manner. Investigations will establish factual details and determine the validity of complaints.”

Citizen can make complaints in person, over the phone or in writing. The Department accepts anonymous complaints. The FPPD’s complaint policy specifies that the IA supervisor reviews and investigates complaints the public’s complaints against employees, as well as internal complaints. In accordance with this policy, the FPPD maintains a complaint log to document and track incoming complaints and their ultimate disposition.

During our interviews, internal and external stakeholders did not voice concerns about the FPPD complaint intake process. We reviewed a report from an FPPD member that shows approximately 70 percent of complaints come from within the Department. One could surmise that because commanders, supervisors and employees initiate investigations of potential misconduct by fellow employees, the Department must have strong internal accountability.

The low percentage of public-generated complaints could reflect public satisfaction with the FPPD. However, the low percentage of public-generated complaints could instead reflect their mistrust in the FPPD’s ability to investigate misconduct legitimately or a lack of understanding about how to make a complaint. A review of data, such as the FPDCC permit user surveys, which generally show positive feedback on FPPD personnel, may support that the low percentage of public-generated complaints truly reflects public satisfaction with police performance.

Nevertheless, the FPPD should consider community engagement and transparency to emphasize the ease of access to and legitimacy of its complaints process. It is common for police departments to have a standalone website with specific information regarding their formal complaint process, explaining how to file a complaint or compliment. The FPPD posts limited information on the Law Enforcement page of the FPDCC website. This page, last updated in August 2020, lists the phone number to report public safety issues, as well as an overview, mission statement and vision statement for the FPPD; however, the webpage is difficult to find.

Investigations

Law enforcement agencies must govern their processes for investigating complaints of misconduct through the implementation of sound investigation practices, labor agreements and applicable law. The agencies must determine which employees should investigate complaints of misconduct. Law enforcement agencies commonly include first-line supervisors in the process by tasking them to resolve minor policy or conduct violations, such as tardiness and uniform violations, that do not merit an internal affairs investigation. First-line supervisors exert tremendous influence over officers and serve an important leadership role. Evidence has shown that in organizations without first-line supervisors, a culture develops in which supervisors view correcting employee behavior as an internal affairs function rather than a supervisory or leadership function. FPPD first-line supervisors



have an appropriate role in responding to minor complaints of misconduct against the officers they supervise.

The FPDCC General Order 04-006 describes the operational authority of the IA section as investigating allegations of violations of Department rules; conduct unbecoming an employee; and violations of federal, state or local laws. We determined that the FPDCC's misconduct investigations files typically contain all the documentation for a standard IA investigation, including:

- + A statement or affidavit from the complainant
- + A notice to the officer and a reasonable opportunity to respond
- + Written interrogatories and responses to the involved member and witnesses
- + Transcribed statements, if recorded
- + Other evidence relevant to the allegations

The FPPD generally conducts investigations in a manner consistent with recommended practices; however, as noted below, the Department often does not complete investigations in a timely manner.

Several interviewees shared that during investigations of complaint against FPPD officers, the Department often adds charges to the investigation related to each of the three sets of rules – those of the FPPD, the Forest Preserves and Cook County. They expressed that they believe the FPPD's practice is unfair, and they should instead be subject to only one set of rules. To combat these perceptions, FPPD leadership should carefully communicate their expectations and be transparent about which policies and standards it applies to each complaint and why. Officers are less likely to believe their agency has internal procedural justice if they perceive that they treated unfairly or being targeted.

FPDCC policy requires the Department complete investigations of citizen complaints within 30 days of their initial receipt unless the chief grants an extension. Investigators file monthly status reports the chief. We did not identify time requirements for non-citizen generated complaints. The Department would benefit from routinely rotating first-line supervisors into the investigations division to better prepare them for their complaint investigatory responsibilities as supervisors. In addition, the FPPD should provide in-service training for first-line supervisors on conducting complaint investigations to gain greater efficiencies.

Adjudication and Disposition

Our review revealed the FPPD consistently struggles with the timely disposition of IA complaints. Generally, these delays occur after the investigation of a complaint is completed, but the chief or command staff has not yet determined a final disposition. The process for investigating IA administrative complaints is as follows.

- + A first-line supervisor determines whether the actions related to a complaint were preventable. These complaints often involve minor motor vehicle incidents.



- + The first-line supervisor documents their finding and recommends discipline, if needed, in a memorandum.
- + A deputy commander reviews the recommendation and concurs or documents why they do not agree with the recommendation.
- + A commander reviews the recommendation and concurs or documents why they do not agree with the recommendation.
- + The chief determines the outcome for each administrative complaint.

Interviewees stated that a previous FPPD chief held some complaints open and unresolved for up to 24 months from the initiation of the complaint. Others reported another previous chief who inadvertently misplaced complaint files. The high turnover of chiefs and command staff members, and the frequent transition of management of IA duties may contribute to the lack of timely disposition of IA complaints. As of mid-December 2020, the FPPD logged 35 complaints. Of those, only 10 had reached disposition. Delays in completing internal investigations contribute to officers' distrust of the investigative process and can leave inappropriate behavior unaddressed. Interviewees informed us that the timeliness of investigations has notably improved since the current deputy commander was assigned to oversee these investigations.

Police departments have benefitted from having written policies that establish time limits for disposition and automatic IA complaints tracking systems that send daily electronic alerts to the department's chain of command notifying them that a step in the disposition process is overdue. These systems foster accountability by generating weekly, monthly and annual audits and can demonstrate to employees that leadership prioritize the timely administrative due process. As previously noted, processes that build on internal procedural justice can affect how officers engage in external procedural justice.

Cook County Office of Inspector General

The Cook County Office of the Independent Inspector General (OIIG) also investigates complaints involving FPPD officers. The OIIG's jurisdiction includes all employees and appointed officials of Cook County government, including FPPD personnel. The OIIG conducts investigations and issues findings and recommendations to Cook County government officials but does not dictate a legal outcome. The OIIG also investigates potential criminal violations involving Cook County employees' conduct while acting in their official capacities and refers such matters for prosecution, if necessary.²⁸ Individuals may make complaints concerning the FPPD directly to OIIG in person, over the phone or in writing. The OIIG website provides a phone number, fax number and a link to submit complaints. Between 2017 and 2020, the OIIG received 30 complaints regarding FPPD personnel. Of those, nine resulted in OIIG investigations, all of which the OIIG completed. Although we did not review the substance of internal investigation case files, we found that compared to similarly sized police departments, the number of complaints appears to be relatively small.

²⁸ <https://www.cookcountyil.gov/agency/office-independent-inspector-general-0>



Cook County Forest Preserves Legal Department

The Cook County Forest Preserves Legal Department can also investigate complaints regarding FPPD officer. The jurisdiction of the Legal Department and the Commission on Human Rights includes complaints of workplace misconduct. Individuals can make complaints in person, over the phone or in writing. Between 2018 and 2020, the Legal Department conducted eight investigations of FPPD personnel, seven of which were adjudicated and one that is ongoing. During our interviews, some employees expressed frustration that these investigations sometimes lasted for a year or more.

Body-Worn Cameras

Before the State of Illinois required that all law enforcement agencies deploy body cameras,²⁹ the FPPD purchased body-worn cameras (BWCs) with the intent of implementing a program that required all officers wear and deploy them. However, the FPPD has not yet fully deployed these cameras. BWCs provide an additional layer of transparency to police officers' actions, and communities have been receptive to their implementation by police departments. Proponents of BWCs cite benefits such as transparency, increased compliance during encounters with the officers, reduced complaints, faster resolution of citizen complaints and lawsuits, the capture of corroborating evidence and the identification of training opportunities.³⁰ As the FPPD deploys BWCs, it should review the Department of Justice's *Implementing a Body-Worn Camera Program: Recommendations and Lessons Learned*.³¹ This report discusses privacy concerns, the impact of BWCs on community relationships, officer concerns, the management of expectations and financial considerations.

The FPPD has been developing its BWC policy and considering options regarding the public release of body-camera footage. Police departments throughout the country have addressed the public release of footage differently ranging from releasing all BWC video footage to limiting the amount of video that is shared with the public. The Department of Justice recommends that "agencies should have clear and consistent protocols for releasing recorded data externally to the public and the news media (a.k.a. Public Disclosure Policies). Each agency's policy must be in compliance with the state's public disclosure laws."³² The Law Enforcement Officer-Worn Body Camera Act (50 ILCS 706/10) guides the disclosure of BWC recordings, which are generally exempt from the Freedom of Information Act (5 ILCS 140). The FPDCC should consult with its legal advisors regarding the applicability of these laws.

The Police Executive Research Forum recommends broad public disclosure of BWC video footage, but outlines two situations where the agency may determine that releasing footage is not appropriate:

- + Videos that contain evidentiary footage in an ongoing investigation or criminal trial
- + Videos that raise privacy concerns of crime victims or witnesses

29 Public Act 101-0652

30 *Body-Worn Cameras: What Evidence Tells Us*. National Institute of Justice. <https://nij.ojp.gov/topics/articles/body-worn-cameras-what-evidence-tells-us>

31 *Implementing a Body-Worn Camera Program: Recommendations and Lessons Learned*. Police Executive Research Forum. <https://www.justice.gov/iso/opa/resources/472014912134715246869.pdf>

32 *Body-Worn Cameras: What Evidence Tells Us*



The emerging trend is for police departments to release BWC video footage with limited exceptions. Although the FPDCC should consult with its legal advisors about the applicability of Illinois law and existing collective bargaining agreements, the FPDCC should consider the following examples as it develops its own policy on the release of BWC video. For example, California law requires police departments, with certain exceptions, to release recordings from BWCs within 45 days of an incident.³³ The FPPD's website should clearly describe its process for responding to requests for video footage, the review and redaction process, and who is authorized to release the footage. The FPPD should consider implementing promising practices, such as contacting a victim's family before the Department releases video footage of their family member to inform them of the video's content and what portion of the video will be released. Another promising practice is to release video footage from critical incidents and provide context.

For another example, the New York City Police Department (NYPD) releases BWC video footage within 30 days of a critical incident and allows victims or victim's family members to view the footage in advance. Upon release, the NYPD may release other evidence or information that provides context for the incident to assist the viewer in understanding what led to the event and what transpired during the event.³⁴

Force Review Board

The FPPD is considering the creation of a use-of-force panel to review when an officer discharges a firearm or uses of force that results in death or serious injury. The creation of such a board is consistent with recommendations of the *President's Task Force on 21st Century Policing*. Action Item 2.2.6 states:

“Law enforcement agencies should establish a Serious Incident Review Board comprising sworn staff and community members to review cases involving officer involved shootings and other serious incidents that have the potential to damage community trust or confidence in the agency. The purpose of this board should be to identify any administrative, supervisory, training, tactical, or policy issues that need to be addressed.”

Although the proposed board will be primarily comprised of sworn police FPPD personnel, the District proposes that one or two non-sworn Forest Preserves employees also participate. Adding non-sworn employees to the board is a good practice. The addition of community members to Serious Incident Review Boards is an emerging practice; however, the FPPD should first establish its proposed board, including non-sworn employees, before deciding whether to add community members. Before including non-sworn individuals on the board, the governing agency should ensure those non-sworn individuals complete an orientation and training on relevant laws and Department policies, as well as officer training, so they can better serve in their unique role.

³³ <https://krctv.com/news/local/new-california-law-requiring-release-of-police-body-camera-footage-goes-into-effect-monday>

³⁴ <https://www1.nyc.gov/site/nypd/about/about-nypd/equipment-tech/body-worn-cameras.page>



Use-of-force review boards provide an extra layer of review after any investigations are completed by a police department. They are not part of the disciplinary process. Rather, they “bring together all elements of the investigation in a risk management context to determine whether they have potential implications for the department’s training, policies and procedures.”³⁵ The use-of-force review board’s ultimate goal is to improve the agency’s response to critical incidents. The FPPD’s proposed board is consistent with this guidance. The board would evaluate whether each incident was tactically sound and identify specific modifications to existing policies, procedures, training tactics or equipment that could minimize deadly force incidents, their inherent risks and the improper deployment or use of a conducted energy device.

³⁵ *Officer-Involved Shootings; A Guide for Law Enforcement Leaders*. International Association of Chiefs of Police.
https://www.theiacp.org/sites/default/files/2018-08/e051602754_Officer_Involved_v8.pdf



Recommendations

Rec. #	Recommendation
1.1	<p>Develop an overall strategic plan for the FPPD that identifies its vision, mission, goals, strategic priorities and measurable objectives. The overall strategic plan should:</p> <ul style="list-style-type: none">+ Assign an organizational champion.+ Be short.+ Include all ranks of personnel.+ Identify specific, measurable, achievable, realistic and time-based objectives that clearly identify what will be done, who is responsible for doing it and when it will be done.+ Include the philosophies of community policing, diversity and inclusion.+ Incorporate the recommendations in this report and the REDI's recommendations as a starting point.+ Be guided by a group of internal and external stakeholders
1.2	<p>Prioritize the review and adoption of a new policy manual. This process should:</p> <ul style="list-style-type: none">+ Identify a clear owner.+ Include an accountable timeline for the creation of the manual.+ Include one or more sergeants or patrol officers who can be a part of the policy manual creation team. <p>Consider assigning a deputy commander or other command level position with the sole responsibility of reviewing and finalizing the new policy manual.</p>
1.3	<p>Develop a comprehensive written recruitment strategy that leverages partnerships and relationships to broaden the FPPD applicant pool. The strategy should:</p> <ul style="list-style-type: none">+ Create an identity and marketing image for the FPPD, like that for the Illinois Department of Natural Resources Conservation Officers, that emphasizes the FPPD's unique role in policing.+ Identify how the FPPD can use the Conservation Corps as a potential recruitment pathway.+ Guide the development of relationships with academic institutions that offer specialty degrees in conservation and protection and specialize in conservation law enforcement.



	<ul style="list-style-type: none">+ Determine where the IDNR and U.S. Park Service find and recruit candidates and consider incorporating those areas into the strategy.+ Explore developing a relationship with the Chicago High School for Agricultural Sciences as a potential recruitment pathway.+ Develop a recruitment campaign the focuses on the unique aspects of an FPPD officer's responsibilities, rather than conventional job descriptions.
1.4	<p>Adopt and embrace, internally and externally, the principles of procedural justice:</p> <ul style="list-style-type: none">+ Treat people with dignity and respect.+ Give the public a voice during encounters.+ Be neutral in decision-making.+ Convey trustworthy motives.
1.5	<p>Make all Department policies available for public review to improve transparency, and regularly post on the Department's website information about stops, summonses, arrests, reported crime and other law enforcement data aggregated by demographics.</p>
1.6	<p>Schedule meetings with permit holders before the picnic season to discuss the Forest Preserves' rules and keys to hosting a safe and successful event. Hold meetings after the season to debrief on what went well and what could be improved.</p>
1.7	<p>Assign a deputy commander or other commander to review the employment plan with human resources to ensure that its provisions related to the recruitment, hiring and promotion of personnel meet the FPPD's needs.</p>
1.8	<p>Review the criteria and assessment process for promoting deputy commanders and commanders to determine why the FPPD has hired few internal candidates for these positions.</p>
1.9	<p>Institute a career development and mentoring program to provide all Department employees with improved skillsets so they can be more successful in their careers and on promotional assessments.</p>
1.10	<p>Provide transparent feedback for the candidates after an FPPD promotional process has been completed. Explain in what areas they excelled and how they can improve their performance during future promotional processes.</p>
1.11	<p>Provide opportunities for first-line supervisors and officers to take on greater leadership responsibilities, such as creating and managing FPPD programs.</p> <p>For example, formally and informally encourage officers and first-line supervisors to problem-solve long-standing and persistent issues in the Forest Preserve, such as homelessness, and support them in their activities.</p>



1.12	Conduct a training needs assessment to identify and prioritize the FPPD's training needs and inform a training strategy.
1.13	Develop a training strategy informed by the training needs assessment that clearly links training priorities to the FPPD's strategic plan and performance management process. The strategy should include in-service, external and supervisory training, as well as enrolling officers in train-the-trainer programs. Consider scheduling additional training during the slower times for the Forest Preserve.
1.14	Create and maintain cross-department partnerships within the District to ensure FPPD members feel they are part of a larger team.
1.15	Increase the FPPD's social media presence to enhance its image, create greater connection with Forest Preserves visitors and provide the public and potential recruits with a greater understanding of FPPD officer's roles.
1.16	Improve the FPPD's use of technology to enhance case reporting, citation issuance, case tracking, and record keeping to analyze trends and assist with accountability and the complaint investigations process.
1.17	Provide training or rotating assignments to the Investigations Division for all first-line supervisors to enhance their complaint investigation abilities and skills.
1.18	Review and commit to establishing and maintaining timelines for completion of each stage of the internal investigations process to ensure the Department completes investigations in a timely fashion.
1.19	<p>Review current policies and procedures and commit to strengthening Internal Affairs processes so investigations demonstrate the FPPD's commitment to improving internal procedural justice, thereby benefiting community engagement and trust.</p> <p>The FPPD must model internal procedural justice. One step to accomplish this would be to address the delays in the disposition of complaints that impact officers' and command staff members' trust and morale.</p>
1.20	Prioritize addressing the delays in providing internal affairs complaint dispositions.
1.21	Transparently post Internal Affairs' policies and methods regarding how a individuals can make a complaint or compliment a Department employee.



(Forest Preserves District of Cook County)

An Independent Assessment of the Forest Preserves Police Department

Appendices

Appendix A: Recommendation Tracker

Cook County Forest Preserves Police Department

Rec #	Recommendation	Priority	Estimated Completion Date	Lead Contact	Team Members	Status
1.1	Develop an overall strategic plan for the FPPD that identifies its vision, mission, goals, strategic priorities and measurable					
1.2	Prioritize the review and adoption of a new policy manual.					
1.3	Develop a comprehensive written recruitment strategy that leverages partnerships and relationships to braden the FPPD applicant pool.					
1.4	Adopt and embrace, internally and externally, the principles of procedural					
1.5	Make all department policies available for public review and regularly post on the department's website information about stops, summonses, arrests, reported crime and other law enforcement data aggregated by demographics.					
1.6	Schedule meetings with permit holders before the picnic season to discuss the Forest Preserves' rules and keys to hosting a safe and successful event. Hold meetings after the season to debrief on what went well and what could be improved.					
1.7	Assign a deputy commander or other commander to review the employment plan with human resources to ensure that its provisions related to the recruitment, hiring and promotion of personnel meet the FPPD's needs.					

1.8	Review the criteria and assessment process for promoting deputy commanders and commanders to determine why the FPPD has hired few internal candidates for these positions.					
1.9	Institute a career development and mentoring program to provide all Department employees with improved skillsets so they can be more successful in their careers and on promotional					
1.10	Provide transparent feedback for the candidates after an FPPD promotional process has been completed. Explain in what areas they excelled and how they can improve their performance during future promotional processes.					
1.11	Provide opportunities for first-line supervisors and officers to take on greater leadership responsibilities, such as creating and managing FPPD programs.					
1.12	Conduct a training needs assessment to identify and prioritize the FPPD's training needs and inform a training strategy.					
1.13	Develop a training strategy informed by the training needs assessment that clearly links training priorities to the FPPD's strategic plan and performance management process. The strategy should include in-service, external and supervisory training, as well as enrolling officers in train-the-trainer programs. Consider scheduling additional training during the slower times					
1.14	Create and maintain cross-department partnerships within the District to ensure FPPD members feel they are part of a larger team.					

1.15	Increase the FPPD's social media presence to enhance its image, create greater connection with Forest Preserves visitors and provide the public and potential recruits with a greater understanding of					
1.16	Improve the FPPD's use of technology to enhance case reporting, citation issuance, case tracking, and record keeping to analyze trends and assist with accountability and the complaint					
1.17	Provide training or rotating assignments to the Investigations Division for all first-line supervisors to enhance their complaint investigation abilities and skills.					
1.18	Review and commit to establishing and maintaining timelines for completion of each stage of the internal investigations process to ensure the Department completes investigations in a timely					
1.19	Review current policies and procedures and commit to strengthening Internal Affairs processes so investigations demonstrate the FPPD's commitment to improving internal procedural justice, thereby benefiting community engagement and					
1.20	Prioritize addressing the delays in providing internal affairs complaint dispositions.					
1.21	Transparently post Internal Affairs' policies and methods regarding how a individuals can make a complaint or compliment a Department employee.					



Appendix B: The Hillard Heintze Team

Rob Davis, Senior Vice President, Law Enforcement Consulting



Rob Davis is a highly regarded and innovative national leader in policing and public safety with extensive experience assessing federal, state and local law enforcement agencies across the U.S. Davis served in a variety of capacities during his 30 years' career with the San Jose Police Department, including as the Chief of Police for seven years. During his time as chief, Davis also served as the President of the Major Cities Chiefs Association.

Robert Boehmer, Esq., Vice President, Law Enforcement Consulting



Robert Boehmer is an experienced facilitator, trainer and public speaker with expertise in collaborative problem solving, community policing, partnership development and information sharing. For the past several years, he has facilitated sessions for the Department of Homeland Security's Building Communities of Trust Initiative, focusing on developing trust among law enforcement, fusion centers and the communities they serve. As a Vice President in the Law Enforcement Consulting practice at Hillard Heintze, Robert manages complex law enforcement assessments and helps police agencies transform their organizations and adopt national best practices and industry standards central to improving accountability, transparency and community trust.

Marcia Thompson, Vice President, Law Enforcement Consulting



Marcia K. Thompson is an attorney and law enforcement practitioner with over 20 years working in the criminal justice field. As a Vice President within our Law Enforcement Consulting practice, she provides oversight, management and technical assistance on various law enforcement assessments, trainings and reviews. Marcia has served as a law enforcement administrator within the Department of Safety at the University of Chicago Police Department, where she oversaw professional standards, accreditation, compliance, training, records management, recruitment, field training, in-service training, leadership development, succession planning, community engagement, youth outreach and the community advisory committee in support of the universities transparency and inclusion initiative. Marcia is a Virginia Supreme Court certified mediator as well as a collaborative problem-solver, change management facilitator, and equal employment opportunity (EEO) and civil rights professional. For many years, Marcia has served as a federal fact finder, EEO counselor, trained EEO investigator and hearing officer, providing neutral hearings and drafting administrative appellate determinations.



Robert C. Haas, Vice President, Law Enforcement Consulting



Robert Haas is a retired Police Commissioner with extensive experience in law enforcement reform, operational assessments and community engagement. In addition to recently assisting Hillard Heintze with several high-stakes projects, such as the U.S. Department of Justice COPS Office CRI-TA Program, he has served as an expert in numerous agencies. Before joining Hillard Heintze, Robert served as a member of a consent decree monitoring team, performing operational assessments with Strategic Policy Partnership, LLC. His role with Strategic Policy Partnership also included a collaboration with the New York University School of Law Policing Project, where he served as the policing expert on two different teams working to foster greater engagement between the police departments and the communities and to initiate alternative policing approaches.

Mark Giuffre, CFE, CAMS, CPP, Senior Director, Law Enforcement Consulting



With 30 years of experience serving in the U.S. Drug Enforcement Administration (DEA), Mark Giuffre is a globally recognized expert in narcotics investigations, interdiction, border security, transnational crime groups and synthetic opioids. He has developed and provided training programs and instruction to federal, state, local, tribal and foreign law enforcement officials. In addition, he is trained, experienced and certified in financial, fraud and asset forfeiture investigations. Mark retired as an Assistant Special Agent in Charge of the DEA Chicago Office where he was responsible for narcotics investigations, money laundering investigations, intelligence and enforcement in five Midwestern states. Earlier in his career, Mark was stationed at the American Embassy in Bangkok, Thailand for seven years, with travel and assignments to 37 other nations.