

Assessment of the Springfield, Massachusetts Police Department for MPAC Certification



POLICE EXECUTIVE
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Introduction

In August 2018, the city of Springfield, Massachusetts contracted with the Police Executive Research Forum (PERF) to conduct an evaluation of the Springfield Police Department's (SPD's) policies, procedures, rules, and regulations as compared to the Massachusetts Police Accreditation Commission (MPAC) certification standards. The purpose of this review was to assist SPD as it seeks Certification from the MPAC.

About the City of Springfield and the Springfield Police Department

Springfield is the third-largest city in Massachusetts. The city is 33.1 square miles in size, and in 2018 its estimated population was 155,032.¹ As of 2018, 63% of the city's residents were white, 21% were Black or African American, 0.4% were American Indian and Alaska Natives, 2.2% were Asian, and 4.6% were two or more races. In terms of ethnicity, 44.7% identified as Hispanic or Latino.² The Springfield Police Department has more than 500 sworn and non-sworn personnel.

About MPAC Certification and Accreditation

MPAC,³ which was established in 1996, is a private, nonprofit organization⁴ whose stated mission is "to ensure that the delivery of police services within the Commonwealth is at the highest level of professionalism and integrity." To that end, MPAC offers two voluntary, professional credentialing programs to police departments in Massachusetts: Certification and Accreditation.

To be awarded Certification or Accreditation, participating agencies must undergo regular assessments, conducted by MPAC assessors, during which agencies demonstrate compliance with a set of professional standards set forth by MPAC. Accreditation requires participating agencies to comply with 257 mandatory professional standards and additional optional standards. Certification requires participating agencies to comply with 162 mandatory standards.⁵ **SPD is working towards achieving Certification.**

¹ U.S. Census Bureau, <https://www.census.gov/quickfacts/springfieldcitymassachusetts>.

² Ibid.

³ Background information regarding MPAC and the Certification and Accreditation Programs was obtained on MPAC's website at <https://masspoliceaccred.net/>.

⁴ MPAC has a Board of Directors with 11 members. Six members are appointed by the Massachusetts Chiefs of Police Association, one is appointed by the Massachusetts Municipal Organization, one is appointed by the Massachusetts Police Association, and three members are elected by the Board. All members of the Board must have "demonstrated expertise in law enforcement and public safety initiatives," and one member must be affiliated with an academic institution.

⁵ The Fifth Edition of the MPAC Standards, which was still in effect as of the time of this report, contains 159 standards for Certification. The Sixth Edition of the MPAC Standards, which MPAC is working to finalize, will have 162 Certification standards. PERF was able to review the proposed Sixth Edition changes and analyzed SPD's compliance with the 162 standards contained therein.

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MPAC's Accreditation and Certification standards are based on national standards established by the Commission on Accreditation for Law Enforcement Agencies (CALEA).⁶ MPAC standards "prescribe 'what' agencies should be doing but not 'how' they should be doing it. That decision is up to each agency to make."⁷ Participation in the Certification or Accreditation Program is voluntary.

As of March 2019, 84 police departments in Massachusetts have been awarded Accreditation, 18 have been awarded Certification, and 111 are in the process of being certified or accredited. Once an agency has been awarded Accreditation or Certification, ongoing assessments take place every three years.

Additional details about the MPAC Certification process can be found in Chapter 1 of this report.

The Benefits of Obtaining MPAC Certification

According to MPAC, credentialing programs such as Certification or Accreditation are "effective risk management tools for preventing and reducing loss in professional liability claims."⁸ Although the Certification process can be a rigorous and challenging undertaking, MPAC cites several benefits that being certified can bring to police agencies. These include:

- Providing a norm for an agency to judge its performance.
- Providing a basis for agencies to "correct deficiencies before they become a public problem."
- Requiring agencies to commit their policies and procedures to writing.
- Promoting accountability among agency personnel.
- Providing a means of independent evaluation of agency operations for quality assurance.
- Enhancing the reputation of the agency and promoting public confidence in the agency.⁹

Project Scope of Services and Tasks

PERF's agreement to help SPD being the process of MPAC Certification includes the following primary tasks:

1. **Compare SPD's current practices with MPAC certification standards** and report on the findings.
2. **Assist SPD with setting up an accreditation filing system** that gives SPD the ability to document all policy changes, archive past policies, and demonstrate the distribution and receipt of written directives and other materials to agency personnel. This documentation is required as part of MPAC certification.
3. **Assist SPD in applying for waivers** of MPAC standards that are not applicable to the department.
4. **Prepare a comprehensive report** that details PERF's findings regarding SPD compliance with MPAC certification standards, including recommendations for changes that SPD must make to

⁶ CALEA is an international law enforcement credentialing authority created in 1979 by several law enforcement leadership agencies, including PERF. <https://www.calea.org/>.

⁷ MPAC, <https://masspoliceaccred.net/standards/>.

⁸ MPAC, <https://masspoliceaccred.net/about-the-program/benefits/>.

⁹ MPAC, <https://masspoliceaccred.net/about-the-program/benefits/>.

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achieve certification. The report should incorporate current department policies and whether they comply with industry-recognized best practices and MPAC certification standards.

PERF completed the following tasks during the course of this project:

Obtained information about the MPAC Certification Process: The PERF team worked closely with senior MPAC personnel to learn about the MPAC Certification process. In order to develop a deeper understanding of the process, PERF reviewed the MPAC training materials, analyzed the 162 Certification standards (including the proposed Sixth Edition changes), and familiarized itself with MPAC's private online community resource. PERF also passed along to SPD all MPAC materials it obtained, and connected SPD staff members with senior MPAC personnel to facilitate a direct line of communication between the two organizations. The PERF team remained in close contact with senior MPAC officials through the duration of this project.

Researched Accreditation Filing Systems: PM AM is an information technology company that offers the Human Capital Management system (PM AM HCM),¹⁰ a software program that law enforcement agencies can use to manage and disseminate written policies, manage training materials, and organize agency documents. SPD, which had an existing contract with PM AM for various services, asked PERF to assess whether it should also utilize PM AM HCM as an accreditation filing system. PERF learned that many Massachusetts police agencies use PM AM HCM for accreditation/certification purposes. In February 2019, the PERF team participated in a product demonstration led by PM AM HCM staff. PERF helped facilitate similar demonstrations for SPD staff members.

Assisted SPD with Accreditation Manager Hiring Process: At the outset of this project, PERF, with encouragement from MPAC officials, recommended to SPD that the agency hire a full-time staff member to spearhead the Certification process. On November 8, 2018, SPD asked PERF for a sample job description for accreditation managers, which PERF provided to the agency on November 9. SPD hired a full-time accreditation manager, who started in this position in July 2019.

Assisted with the Waiver Process: PERF was tasked with helping SPD identify and apply for possible waivers of the MPAC Certification standards. The PERF team conducted a conference call with SPD personnel to walk through each of the 162 Certification standards and identify any that did not apply. Based on these discussions, PERF found that each of the standards applied and thus no waivers were needed.

Conducted interviews and on-site observations: The PERF team, along with the MPAC Executive Director, conducted a site visit to SPD on April 9, 2019. The purpose of the visit was to meet with SPD officials, facilitate a brief training session on the MPAC Certification process, review a sampling of SPD's written directives, and conduct a walk-through of SPD facilities.

¹⁰ See "PM AM HCM for Law Enforcement Agencies." https://www.pmamhcm.com/law_enforcement.html.

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Reviewed SPD's Written Directives: SPD provided PERF with the following written directives for review: the SPD Rules & Regulations (adopted 1981, amended 1983), which consists of 40 rules and regulations covering a variety of topics; and thousands of general orders (GOs) dating back to the late 1980s that supplement, clarify, replace, and update the Rules & Regulations. The GOs issued prior to 2006 were contained in a Microsoft Access database, and those issued after 2006 were forwarded as Microsoft Word or PDF files. For each of the 162 MPAC Certification standards, PERF staff searched these rules, regulations, and GOs to determine whether a relevant written directive existed that would demonstrate compliance with the standard. PERF then documented whether SPD was in compliance with the standard and outlined any steps that must be taken in order to achieve compliance.

PERF also provided additional recommendations for strengthening SPD's written directives to ensure that they are aligned with current policing research and best practices.

Overview of Report

This report presents PERF's findings regarding SPD's current compliance with the MPAC Certification standards and provides recommendations for bringing SPD's policies and practices in line with the standards. The report, which is intended to provide guidance to SPD as it goes through the Certification process, includes the following chapters:

- **Chapter 1 – Overview of the MPAC Certification Program:** This chapter summarizes the MPAC Certification process and outlines the steps SPD will take as it moves forward with Certification.
- **Chapter 2 – Revising SPD's Overall Written Directive System:** This chapter discusses the process for revising a written directive system and creating a policy-procedure manual. The recommendations in this chapter relate to how SPD can create a more effective *overall* system. The topics discussed Chapter 2 include:
 - how to develop an effective policy-procedure manual;
 - how to organize and format written directives;
 - how written directives should be stored and disseminated; and
 - the importance of ongoing evaluation of written directives.
- **Chapter 3 – SPD's Compliance with MPAC Certification Standards:** This chapter documents SPD's levels of compliance with MPAC's 162 Certification standards as of the time of this report. When it was determined that SPD was not in compliance with a given standard, PERF provided guidance for the steps that SPD must take in order to achieve compliance. **As recommended by MPAC, this analysis is presented in a detailed, user-friendly Compliance Log that SPD can use to track its progress towards Certification going forward.** The Compliance Log is attached to this report as Appendix A.

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SPD's decision to seek voluntary MPAC Certification demonstrates the department's commitment towards improving its policies, practices, operations, and administration. SPD has already taken many steps towards achieving its goal of Certification, including officially applying for the Certification Program, commissioning this study, hiring a full-time accreditation manager to manage the Certification process, and undergoing initial training with MPAC. Moving forward with the Certification process will help SPD continue to strengthen its service to the people of Springfield.

Chapter 1. Overview of the MPAC Certification Program

In April 2019, Donna Taylor Mooers, the Executive Director of the Massachusetts Police Accreditation Commission (MPAC) conducted an in-person briefing with SPD personnel and PERF staff. This briefing, which was attended by members of SPD's command staff, key non-sworn personnel, and a labor union representative, included an overview of the MPAC Certification Program, a walk-through of SPD facilities, and a discussion about the steps that SPD should take as it works through the Certification process.

The materials provided to SPD during this briefing, all of which are available directly from MPAC or on MPAC's website, provide a detailed, comprehensive roadmap for the Certification process. This section summarizes the process and outlines the steps that SPD will be taking as it moves forward with Certification.

MPAC Certification Standards

In order to be awarded Certification, police departments must demonstrate compliance with a set of mandatory professional standards issued by MPAC. These standards are based on the national standards established by the Commission on Accreditation for Law Enforcement Agencies (CALEA).

In Chapter 3 of this report, PERF analyzes SPD's current levels of compliance with each of the 162 Certification standards set forth by the Sixth Edition of MPAC's Standards for Accreditation and Certification.¹¹ These 162 mandatory standards for Certification cover the following subject areas:¹²

- ***Chapter 1: Law enforcement role and authority***, including search/seizure/arrest, use of force, and weapons use and training.
- ***Chapter 11: Organization and administration*** of the police department, including accreditation maintenance issues.
- ***Chapter 12: Direction*** of the police department, including the written directive system.
- ***Chapter 16: Allocation and distribution of personnel***, including training and the use of police reserves.
- ***Chapter 17: Fiscal management and agency property***, including the maintenance of cash funds.
- ***Chapter 22: Compensation, benefits, and working conditions.***
- ***Chapter 26: Disciplinary procedures***, including the code of conduct, officer appearance, and harassment.

¹¹ At the time of this report, MPAC was in the process of finalizing the Sixth Edition of the standards and the Fifth Edition was still in effect. However, MPAC has issued a list of the changes that will take place in the Sixth Edition, so PERF was able to analyze SPD's compliance with the newest version of the standards.

¹² Some chapters appear to be "missing" from this list because those chapters contain standards for the higher level of MPAC "Accreditation," not for "Certification."

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- ***Chapter 32: Selection of personnel***, including background investigations, training, medical examinations, and fitness tests.
- ***Chapter 33: Training and career development***, including training record maintenance, and required training programs.
- ***Chapter 41: Patrol***, including specific duties of patrol officers.
- ***Chapter 42: Criminal investigation***, including the use of informants, line-ups, and interview rooms.
- ***Chapter 44: Juvenile operations***, including the procedures for custody and interrogations.
- ***Chapter 46: Critical incidents, special operations, and homeland security***, including a breakdown of various functions within the department.
- ***Chapter 52: Internal affairs***, including complaint investigations, record maintenance, and procedural issues.
- ***Chapter 55: Victim/witness assistance***, including assisting victims and witnesses who have been threatened.
- ***Chapter 61: Traffic enforcement***, including stops and DUI procedures.
- ***Chapter 70: Detainee transportation***, including procedures for transport, restraint, and escape.
- ***Chapter 71: Processing and temporary detention***, including procedures and physical facilities.
- ***Chapter 72: Holding facilities***, including access, physical conditions, and policies.
- ***Chapter 81: Communications***, including two-way capabilities and alternate power sources.
- ***Chapter 82: Central records***, including security and protocols for juvenile records.
- ***Chapter 83: Evidence collection and preservation***, including procedures and guidelines.
- ***Chapter 84: Property and evidence control***, including security, inspections, and storage of weapons and controlled substances.

Six Phases of the Certification Process

The Certification¹³ process consists of six phases: Information, Application, Self-Assessment, Pre-Assessment, On-Site Assessment, and Commission Review.¹⁴ MPAC's "Getting Started" program manual, which was provided to SPD personnel during the April 2019 briefing, provides more details about these phases and a sample timetable for completion. MPAC does not impose any time limits with respect to achieving initial Certification, and most agencies complete the process within two to five years.

Phase I: Information (Completed by SPD)

During the Information phase, MPAC provides interested agencies with information about the Certification process, including costs, which standards must be met, procedural requirements, program benefits, and support services such as training and access to MPAC resources.

¹³ These phases also apply to the Accreditation process.

¹⁴ MPAC Process. <https://masspoliceaccred.net/about-the-program/process/>.

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SPD has completed the Information phase. Department personnel have attended MPAC's two training workshops: "Getting Started: Lessons Learned" and "Program Orientation: Police Certification and Accreditation," which are designed to help police departments as they begin the Certification or Accreditation process. The brief training provided to SPD by MPAC's Executive Director in April 2019 also covered the topics discussed in these workshops.

SPD has also obtained access to the *Massachusetts Police Accreditation Network*, MPAC's private website. This website, which is intended for leaders and accreditation managers from police departments participating in MPAC programs, provides users with links to MPAC resources (including the full set of MPAC standards). The website also serves as a forum for users to connect with one another to ask questions, share information, and provide support to their counterparts in other police departments across the state.

Phase II: Application (Completed by SPD)

In order to participate in the Certification Program, police agencies must complete an application and pay an annual fee. The amount of the fee is based on the number of full-time police officers in the agency. As part of the Application phase, MPAC also requires that police agencies appoint an accreditation manager to manage the process and serve as the agency's primary liaison to MPAC.

SPD has completed the Application phase. Additionally, in June 2019 SPD hired a full-time accreditation manager.

- ***Recommendation:*** MPAC offers introductory training workshops for accreditation managers. These workshops, which are offered 3-4 times per year, provide substantive and procedural guidance on completing the Certification process. PERF recommends that SPD's accreditation manager attend MPAC's training workshops. The accreditation manager should also become familiar with SPD's accreditation filing software and MPAC's resources.

Phase III: Self-Assessment (In progress at SPD)

According to MPAC, the Self-Assessment phase involves a "thorough examination of the agency, by the agency" and is the most "labor intensive and time-consuming" phase of the Certification process.¹⁵ This is because the Self-Assessment phase includes a comprehensive review of agency written directives, policies, practices, and procedures to assess compliance with the Certification standards, as well as all other activities associated with preparing for the MPAC's on-site assessment.

- ***Recommendation:*** SPD's accreditation manager should develop a basic strategic plan for completing the Self-Assessment phase. This is a recommendation provided by MPAC in its

¹⁵ MPAC, <https://masspoliceaccred.net/about-the-program/process/>.

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“Getting Started” program manual, which was provided to SPD at the April 2019 briefing. According to MPAC, the strategic plan should be in writing, should establish a short-term to-do list in manageable stages, and should incorporate MPAC’s “Getting Started” checklist (which is also provided in the program manual).

SPD is currently in the process of completing the Self-Assessment phase, which consists of the following major activities:

- **Apply for waivers:** At the outset, a police agency must apply for waivers of any Certification standards that do not apply to the agency. **PERF reviewed the 162 Certification standards with SPD officials, and together determined that SPD could not seek waiver of any of the standards.**
- **Analyze agency compliance with MPAC standards:** Next, the agency must review its current written directives, policies, practices, procedures, and operations to determine whether it is in compliance with each of the 162 standards for MPAC Certification. **PERF has completed this review of the 162 standards for SPD, the findings of which are detailed in Chapter 3 of this report.**
- **Achieve compliance where noncompliance is determined:** Once an agency has identified any standards with which it is not in compliance, it must take corrective action to ensure that compliance is met. “Corrective action” generally entails drafting or revising written directives, making adjustments to agency facilities and procedures, and sometimes purchasing new equipment. These changes must be made and implemented prior to MPAC’s assessment. **As part of its review, PERF provided recommendations for how SPD can achieve compliance for any standards where noncompliance was found. These recommendations are also detailed in Chapter 3 of this report.**
- **Document agency compliance for assessor review:** In order to achieve Certification, it is not enough that the police agency comply with each of the 162 MPAC standards; the agency must also be able to provide evidence of its compliance. Each MPAC standard includes a checklist of items, usually a written directive or other documentation, that agencies must provide in order to demonstrate compliance with that standard. MPAC has also set forth specific requirements regarding how to organize and present this compliance documentation. These requirements are very detailed and mandate how compliance documentation is stored, labeled, highlighted, etc. **Recommendations regarding SPD’s accreditation filing system are discussed in Chapter 2 of this report.**

In addition to these tasks, MPAC also advises police agencies to notify personnel about the agency’s efforts to achieve Certification. MPAC recommends that initial notification should be made via an agency-wide memorandum from the Police Commissioner to all agency personnel that is read at roll

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calls and posted throughout agency facilities. MPAC also recommends that this memorandum be sent to bargaining units representing agency employees, with an invitation to meet to discuss Certification issues.

- **Recommendation:** SPD's Police Commissioner should issue an agency-wide memorandum to all personnel and all bargaining units that explains the Certification Program. MPAC's "Getting Started" program manual, which was provided to SPD personnel during the April 2019 briefing, includes a detailed list of items that should be included in both the initial notification and in any follow-up reports. The "Getting Started" manual also includes sample memoranda that can be used as a template. The memorandum, which should solicit input from personnel, should be read at roll calls and posted throughout SPD facilities.
- **Recommendation:** SPD should download the MPAC Certification standards from Community Zero and make them available to all agency personnel. This will demonstrate transparency and help personnel better understand the Certification process.

Phase IV: Pre-Assessment (Forthcoming in SPD)

Once police agencies have completed a self-assessment, their next step is to undergo the Pre-Assessment phase.¹⁶ This phase, which MPAC states is "designed to give agencies an indication as to their readiness to be assessed by [MPAC]-appointed assessors," involves two preliminary reviews:

- **Mock assessment:** This external peer review is arranged by the police agency and is typically conducted by several specially-trained accreditation managers from other Massachusetts police agencies that participate in MPAC programs. According to MPAC, the mock assessment serves as a "dry run" that gives agencies the chance to identify and address any problem areas before the official MPAC assessment.
- **Administrative review:** This review, which is arranged by MPAC's Executive Director, is aimed at ensuring that the police agency has met MPAC's requirements for preparing and presenting compliance documentation.

After the police agency's readiness has been determined, the agency works with MPAC to begin planning and scheduling the official assessment.

Phase V: On-Site Assessment (Forthcoming in SPD)

For the Certification Program, the On-Site Assessment typically takes place over two days and is conducted by a two-member assessment team from MPAC. Following an introductory meeting between the assessment team and agency personnel, the MPAC team spends two days reviewing the

¹⁶ MPAC, <https://masspoliceaccred.net/about-the-program/process/>.

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agency's written directives and other documents, interviewing agency personnel, and observing aspects of the agency's facilities in order to gauge whether the agency is in compliance with the 162 Certification standards.

Once the Assessment is complete, the MPAC team briefs agency personnel on its findings and recommendations, then provides a preliminary draft "Activity Report" that details any additional steps the agency must take in order to achieve compliance. The agency will use this report to begin addressing any areas of noncompliance, and then MPAC will review the agency's actions and complete a supplemental report.

In the "Getting Started" materials provided to SPD during the April 2019 briefing, MPAC states that the On-Site Assessment is an "audit in nature and limited in scope by design." MPAC also describes the assessment as "not much different than *line and staff inspections* in that they both serve to acknowledge what's right and identify and correct deficiencies."

Phase VI: Commission Review (Forthcoming at SPD)

MPAC convenes three times per year (January/February, May/June, and September/October) in order to consider agencies for an award of Certification or Accreditation. After a police agency has finished its On-Site Assessment and completed all follow-up work to address compliance deficiencies, it is invited to attend MPAC's next regularly-scheduled meeting. At the meeting, a summary of the agency's assessment is provided to MPAC. This summary is based on the findings and recommendations of both the MPAC assessment team and MPAC's Executive Director.

Awards for Certification or Accreditation are granted for a three-year period. The agency must be reevaluated every three years in order to ensure continued compliance and be recertified.

Chapter 2. Revising SPD's Overall Written Directive System

The Massachusetts Police Accreditation Commission (MPAC) strongly recommends that, at the outset of the Certification process, police agencies should “evaluate the effectiveness of their written directive system first and decide whether or not it is effective, user-friendly or in need of any change(s).”¹⁷ **This means that agencies must go beyond just revising and updating individual policies; instead, they must also look at how their written directives fit together, how they are organized and formatted, and how they are stored, disseminated, and updated.**

As part of its review, the Police Executive Research Forum (PERF) evaluated the Springfield Police Department's (SPD's) overall written directive system. PERF found that SPD's current written directive system lacks organization, includes many outdated and redundant directives, and will require a significant overhaul in order to meet MPAC's standards.

This chapter provides recommendations for how SPD can make its overall written directive system more effective and user-friendly. This chapter does *not* address the content of SPD's individual policies and procedures, which are discussed in Chapter 3.

Chapter 2 is divided into the following topics:

1. **Overview of SPD's current written directive system.**
2. **Developing a strategic plan for revising the written directive system**, including establishing the purpose of the written directive system, the personnel who should be involved in the process, and the steps that SPD should take.
3. **Organizing the written directive system**, including recommendations for how SPD can organize its written directives into a comprehensive, user-friendly, and up-to-date policy-procedure manual.
4. **Formatting the written directives**, including recommendations for formatting the directives in a user-friendly way.
5. **Storing and disseminating written directives**, including recommendations for using electronic

What is a Written Directive System?

For the purpose of MPAC review, a “written directive system” describes a police agency's formal network of written directives, including (but not limited to):

- Policies
- Procedures
- Rules
- Regulations
- Orders
- Memoranda

MPAC Standard 12.2.1 (“The Written Directive System”) states that the purpose of a formal written directive system is to “provide employees with a clear understanding of the constraints and expectations relating to the performance of their duties.”

¹⁷ MPAC “Getting Started: Evaluating Your Written Directive System,” from the “Getting Started” program manual provided to SPD personnel during the MPAC training session on April 9, 2019. (Emphasis in original.)

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filing systems to store, organize, and distribute written directives.

6. **Evaluating and updating written directives**, including guidance on how to conduct ongoing reviews and updates of written directives.

SPD's Current Written Directive System

At the time of this report, SPD did not have a comprehensive policy manual, clear standard operating procedures (SOPs) to govern various units and activities, or any other centralized, organized system for its written directives. Instead, SPD's written directive system consists of the following:

- **SPD Rules & Regulations (adopted 1981, amended 1983)**: SPD's only cohesive set of written directives consists of 40 rules and regulations that cover topics including: personnel/unit roles and responsibilities; chain of command; police records and property; handling of prisoners; the use of firearms; conduct of officers (including uniforms and appearance); leave policies; and the operation of police vehicles. SPD's Rules & Regulations primarily cover administrative and personnel matters rather than police operations, tactics, and strategies.
- **General Orders (GOs)**: SPD's written directive system also includes thousands of GOs, dating back to the late 1980s or earlier, that have been issued over the years to supplement, clarify, replace, and update the Rules & Regulations. These GOs cover a variety of topics and range from two-line directives to detailed, multi-page policies and SOPs on topics such as body-worn cameras and the use of Narcan to reverse opioid overdoses.

In April 2019, representatives from PERF and MPAC met with SPD officials to discuss this assessment. During this meeting, **the PERF team and SPD personnel agreed that SPD's written directive system is confusing, poorly organized, and includes numerous individual directives that are outdated and no longer in effect. As a result, the consensus was that SPD's overall written directive system needs to be completely revised and streamlined into a comprehensive, user-friendly policy-procedure manual.**

- **Recommendation**: SPD should overhaul its written directive system as a whole to ensure that it is effective, user-friendly, and up to date. This includes **creating a single policy-procedure manual** that merges and updates SPD's existing Rules & Regulations and GOs. This chapter of PERF's report contains specific recommendations about how the policy-procedure manual should be organized, what it should contain, and how SPD can improve the way in which its written directives are formatted, stored, and disseminated.

PERF learned that at one point an SPD official (who has since retired) began the process of revising SPD's written directive system with an eye towards achieving MPAC Certification. He drafted a Table of Contents for a proposed policy-procedure manual, along with several written directives that comply with MPAC standards. **PERF strongly recommends that SPD use this draft policy-procedure manual as**

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a guide when overhauling its written directive system. In many cases, SPD will be able to adopt these drafts directly with minimal edits.

One of the proposed directives that the former SPD official drafted is ADM-100 (“Written Directive System”), which sets forth draft policies and procedures for developing, issuing, and reviewing written directives. PERF recommends that SPD adopt the draft ADM-100 as the first section of its new policy-procedure manual.

Specific recommendations for how to incorporate other draft written directives are included throughout this report, including in the detailed analysis of the 162 MPAC standards presented in the Compliance Log attached as Appendix A.

Developing a Strategic Plan for Revising the Written Directive System

The first step in revising a written directive system is to *develop a strategic plan*. The strategic plan should lay out a detailed, systematic process for developing, reviewing, and updating written directives and should address “big picture” questions, such as: What are the agency’s goals for its written directives? Who will be involved with reviewing, revising, and developing written directives? What will the revision process look like?

This section examines these “big picture” questions and provides recommendations for how SPD should approach the process of revising its written directive system.

- ***Recommendation:*** As it begins revising its written directive system, SPD should develop a strategic plan that reflects the agency’s goals for the written directive system and outlines the revision process. More detailed recommendations regarding the items that should be included in the strategic plan are found throughout this section.

Establishing the Purpose and Goals of the Written Directive System

SPD should first determine the purpose and goals for its written directive system and ensure they are reflected in the agency’s strategic plan. Although the goals for a written directive system will vary from one agency to the next, MPAC Standard 12.2.1 (“The Written Directive System”) states that the purpose of a formal written directive system is to “provide employees with a clear understanding of the constraints and expectations relating to the performance of their duties.”

In other words, a good written directive system will let personnel know what conduct is required of them, will provide them with guidance on how to perform their duties, and will provide a basis for discipline, training, and accountability. For example, the Rules and Regulations for the Chelsea (Massachusetts) Police Department (CPD), an agency that has achieved MPAC Certification, states: “This Manual will generally serve as the basis for departmental discipline. It attempts to outline the minimal

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level of conduct expected of each officer. Familiarity with its contents is required. On a more positive note, however, officers are encouraged to use this Manual as part of their overall training experience. They should endorse the ethical standards and commit themselves to a code of conduct befitting members of our noble profession.”

The purpose and goals of the written directive system should provide the foundation for SPD as it develops the framework for its new system.

Assembling the Policy Development Team

When revising or developing its written directives, another key step that a police agency must take is to determine which personnel will be involved in the process. One common approach is to **assemble a policy development team** that is led by a project coordinator and comprised of personnel from various units across the agency.

The project coordinator/manager: This person is responsible for coordinating the development, implementation, and review of the agency's written directive system. SPD has hired an accreditation manager to oversee the MPAC Certification process, and this person can also naturally serve as a lead coordinator in the overall process of revising and developing SPD's written directives.

The policy development team: Revising and developing written directives should be a collaborative process that involves personnel from across the police agency. The policy team should be comprised of personnel from various units (both line and supervisory staff); employees with special knowledge or who are critical to agency operations; legal staff members; and any others as determined by the Police Commissioner. Including personnel from across the agency is important for two key reasons. First, personnel from various units and offices bring diverse perspectives and areas of expertise, which will result in stronger and better-informed written directives. Second, cross-agency collaboration can ensure that personnel outside of the executive staff have a chance to provide input and share their views on important policy decisions that affect them.

Creating a Process Map

After assembling its policy development team, SPD should turn its focus to establishing a systematic process for revising its written directives and creating the policy-procedure manual. One way to do this is by **creating a process map**, which consists of a step-by-step plan to determine which components of the written directive system to address during the revision process, action items and their timelines for completion, and who will be responsible for completing various tasks. This process map should be included as part of the strategic plan discussed earlier in this section.

When determining what to address during the revision process, SPD can look to the following list of factors set forth by MPAC:

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- The nomenclature used for written directives (e.g., policies, GOs, regulations)
- The system used for storing and disseminating written directives, including whether to use an electronic or manual system
- The overall organization of written directives
- The format of written directives (e.g., titles, headings, letterhead, page setup)
- Indexing systems and tables of contents.

The specific action items, timelines, and persons responsible for various tasks will depend on various factors, including the number of personnel assigned to the revision process; whether the top SPD leaders make the project a priority; and the extent to which SPD decides to overhaul its written directive system. One goal of this report is to provide guidance that helps SPD streamline the revision process so that it can complete revisions to its written directive system in a more efficient, timely manner.

- ***Recommendation:*** SPD should develop a process map that outlines a process for overhauling the agency's written directive system and creating the policy-procedure manual. The process map should include a step-by-step plan for deciding which components of the written directive system will be addressed in revisions, action items and their timelines for completion, and who will be responsible for completing various tasks. The process map should be created by the policy development team and included as part of SPD's strategic plan.

Organizing the Written Directive System – The Policy-Procedure Manual

Once a police agency has established its process for revising its written directive system, it must then decide how it wants the written directive system to be organized. The organizational questions that an agency must consider include:

- Should there be one large policy-procedure manual that includes all written directives? Separate manuals for each unit? Some combination of the two?
- What kinds of directives should be included in the manual (e.g., policies, procedures, orders, memoranda, regulations, etc.)?
- Can the agency's existing written directives be merged and streamlined as part of this process?
- How should the agency index and organize the various topics covered by the written directives?

As discussed earlier in this chapter, SPD's current written directive system consists of a set of 40 Rules & Regulations that were last amended in 1983, along with thousands of orders that have been issued over the past several decades to supplement, replace, and clarify the Rules & Regulations. This piecemeal, poorly organized system creates confusion about which directives are in effect versus which ones have been superseded, and makes it difficult for personnel to easily access and review written directives.

This section provides recommendations for how SPD can address these challenges by organizing its written directives into a comprehensive, user-friendly, and up-to-date policy-procedure manual.

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Appendix B of this report includes a list of useful resources that SPD can consult as it develops the manual.

Developing a Policy-Procedure Manual

Some agencies use one single policy-procedure manual that covers all of the agency's administrations and operations, while other agencies – particularly larger ones – have multiple manuals for various units or functional areas. Either way, a policy-procedure manual can be an effective way to ensure that all of the agency's written directives are streamlined, up to date, and easily accessible to agency personnel.

- **Recommendation:** SPD should create a centralized, comprehensive policy-procedure manual that contains all of the written directives regarding administrations and operations that apply agency-wide (e.g., code of conduct, use of force, forms and reporting, uniforms and equipment, chain of command, training, etc.). SPD should also create separate operational manuals that apply to specific units or functional areas (e.g., criminal investigations, internal investigations) that are assigned to unit members. SPD should merge its current written directives (the Rules & Regulations manual and the thousands of GOs) so that all outdated and superseded directives are removed.

Components of a Policy-Procedure Manual

A policy-procedure manual should include the following components:

- **Purpose of the manual:** This section should include a statement regarding the manual's purpose and goals, an overview of the policy development process, and definitions of terms commonly used in the manual.
- **Overview of manual organization:** This section should describe the primary components of the manual and explain how the individual written directives are numbered and organized.
- **Table of contents:** The Table of Contents lists the topics in the manual and page numbers where every item can be found.
- **Department's source of legal authority:** This section contains the statutory authority granting police powers to the department from the municipal, county, and/or state government.
- **Agency mission and values statement:** This section states the agency's mission and values statements, which should be reflected throughout the written directives contained in the manual.
- **Policy and procedures statements:** The individual written directives should be organized by topic and should be found in the appropriate section of the manual.
- **Topical index:** Index of topics listed in alphabetical order by key word and linked to the manual by page/policy number.
- **Authorized forms:** Samples of all essential forms currently approved by the agency.

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Topics to Include in the Policy-Procedure Manual

A policy-procedure manual should be organized into sections based on subject matter. For example, all written directives regarding Patrol should be in one section, those related to investigations should be in one section, etc. SPD will thus need to determine which topics to include in the manual, and how to organize those topics in a way that is coherent and user-friendly.

As discussed earlier in this chapter, several years ago a now-retired SPD official began the process of revising SPD's written directive system with an eye towards achieving MPAC Certification. This official developed a draft Table of Contents for an agency-wide policy-procedure manual, which is attached to this report as Appendix C. The official based much of the substance and format of the draft manual on written directives from other Massachusetts agencies that had achieved MPAC Accreditation or Certification.

The draft manual was called an "Administrations and Operations Manual" and included the following sections:

- **General Management**: Includes the Codes of Ethics, Department Role and Authority, Organizational Chart, Direction and Supervision, etc.
- **General Procedures**: Includes guidance and rules on police use of force, police use of firearms and other weapons policies, use of naloxone, arrest and detainment procedures, etc.
- **Patrol**: Includes search and seizure procedures, pursuits, officers' use of seatbelts, responses to domestic violence calls, juvenile operations, etc.
- **Traffic**: Includes motor vehicle searches, traffic law enforcement, motor vehicle collision responses and investigations, etc.
- **Investigations**: Includes protocols and procedures for criminal investigations, directives for investigating specific types of crimes, evidence and property handling procedures, crime scene procedures, victim/witness assistance, eyewitness ID procedures, informants, surveillance, etc.
- **Community Services**: Includes the ride-along program, adopt-a-school program, etc.
- **Tactical Situations and Special Responses**: Includes disasters and emergencies, crowds and demonstrations, bomb threats, civil disturbances, after-event action reports, hostage situations, death scene checklists, etc.
- **General Personnel Practices**: Includes uniforms, body armor, collective bargaining, sick and emergency leave, grievance procedures, work-related injuries, medical marijuana use, etc.
- **Personnel & Training**: Includes classifications/duties and responsibilities for various ranks, positions, and assignments (both civilian and sworn). Also includes policies and procedures regarding recruitment, hiring (e.g., background checks), training, promotions, evaluations, complaints, and discipline.
- **Communications**: Includes radio and telephone procedures, policies regarding employees' use of the internet and social media, etc.

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- **Records and Property:** Includes records maintenance, evidence and property control, equipment inspections, etc.

This draft Table of Contents appears to contemplate SPD adopting one overall policy-procedure manual, rather than separate manuals for each unit or functional area. However, the draft manual is organized in a way that would allow the directives for specific units or functional areas to be lifted out as smaller operational manuals. PERF found that this is a well-organized draft manual and that it would work well for SPD's needs.

- ***Recommendation:*** PERF **strongly recommends that SPD use this existing draft Table of Contents as a template as it develops its policy-procedure manual.** A manual that includes these topics and follows this general organization would be comprehensive, streamlined, and user-friendly for SPD personnel. Additionally, the official who drafted this Table of Contents took into considerations the policies and procedures that MPAC requires for Certification and included them in the draft. The official who drafted the Table of Contents also drafted several of the individual policies and SOPs, **and SPD will be able to adopt many of these directives as is or with minimal edits.** PERF's recommendations regarding the adoption of individual draft written directives are discussed in Chapter 3 of this report.

The Policy-Procedure Manual Indexing System

One key to a well-organized policy-procedure manual is having a consistent, user-friendly indexing and pagination system. This will help personnel access information quickly and easily. MPAC's "Getting Started" program manual, which was provided to SPD personnel during the April 9, 2019 briefing, notes the importance of using a letter prefix for each function or topic (e.g., "ADMIN" for "Administration") and includes examples of indexing and pagination systems.¹⁸

- ***Recommendation:*** SPD should ensure that its policy-procedure manual includes a consistent, user-friendly indexing and pagination system. This includes organizing the written directives into categories by topic and subtopic, using a letter prefix for each broad function/topic, and numbering directives in the sequential order in which they are to appear in the manual. The section below includes more detailed information about titling and labeling written directives.
 - The draft Table of Contents for the "Administration and Operations Manual" developed by the now-retired SPD official (discussed above) uses the following broad categories and prefixes: Administration (ADM); Operations (OP); Personnel Administration (PA); and Support Functions and Activities (SUP).

¹⁸ MPAC, "Getting Started" program manual, Tab 6 (provided by MPAC during April 2019 meeting).

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Formatting the Written Directives

One of SPD's goals in revising its written directive system is to make it more user-friendly and easily accessible to personnel. A key aspect of this is ensuring that the formatting of individual policies and procedures – the page layout, topic organization, headings, letterhead, etc. – is as clear and consistent as possible. This section provides recommendations for how SPD should format its written directives. The next chapter will discuss recommendations for substantive revisions that SPD should make to the content of its written directives to ensure that they comply with MPAC standards.

MPAC officials recommended that SPD consider using the services of **Information Mapping**,¹⁹ a company that helps design and format written policies. Information Mapping takes the text of an agency's written directives and converts it into a format that it has developed based on research regarding effective policy design and presentation. MPAC officials noted that alternatively, SPD could simply look at the written directives in agencies that have used Information Mapping, including the Massachusetts State Police, as examples for how to format its directives.

- **Recommendation:** SPD should consider using Information Mapping to help format and design its written directives. If SPD does not want to pay for the Information Mapping service, it should at least use the Massachusetts State Police written directives as a template for formatting and design. An example of a Massachusetts State Police written directive is attached to this report in Appendix D.

The format of written directives should be standardized across the entire policy-procedure manual. Each directive should include the following items:

- **Name of the department:** The department's name and jurisdiction should be included on every page of the directive.
- **Type of directive:** The document should state what type of directive it is (policy, procedure, rule, order, etc.).
- **Subject of the directive:** Each directive should contain a brief title that clearly identifies the primary activity, job, issue, or other matter addressed therein.
- **Number:** The directive should be numbered as part of a sequential numbering system that is consistent throughout the policy-procedure manual.
- **History and dates:** The directives should include the date that the directive first became effective, as well as the review dates, if any, of when the directive was later revised or expanded upon. Each directive should indicate whether it is an update to or replacement of another written policy. This creates a record and helps personnel ensure that they have the most recent version of the directive.
- **References:** Each directive should include a note that identifies any other directives within the manual to which it is closely linked. For the purpose of SPD's written directives, the directive

¹⁹ Information Mapping, <https://www.informationmapping.com/en/>

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should also include a cross-reference to the number of any MPAC Certification standards that apply to that directive. (For examples of including cross-references to MPAC standards, see the draft directives created by the former SPD official, as well as the written directives from the Chelsea, MA Police Department.)

- **Page number:** The directive should indicate the page number and the total number of pages in the directive (e.g., Page 1 of 5, Page 2 of 5, etc.).
- **Recommendation:** SPD should strive to make the format of its individual written directives as clear and user-friendly as possible. It is particularly important that the format of each directive be consistent with others throughout the written directive system. One way to ensure consistency is to require each directive to include a prescribed list of components. **Written directives should include a cross-reference to the number of any MPAC Certification standards that apply to that directive.**

Storing and Disseminating Written Directives

There are three key questions regarding the storage and dissemination of written directives that SPD will have to consider as it works towards MPAC Certification:

- What is the best method for storing the agency's written directives?
- What is the best way to compile and present the documentation that will be required during the MPAC Certification assessment?
- What is the most effective method for disseminating new and revised written directives to SPD personnel, and for demonstrating that the directives have been received and reviewed?

This section examines each of these questions and discusses how the PM AM HCM electronic filing system can help SPD effectively address its storage and dissemination needs.

Storing Written Directives

PERF learned that SPD's written directives are currently not stored in any sort of centralized location. Instead, the various directives are scattered among various electronic files, hard-copy manuals, and electronic databases. SPD does currently use PM AM HCM, an electronic document filing system that will be discussed in more detail later in this section. However, PERF learned that historically, SPD's use of PM AM HCM has been minimal, and that the agency has not used the system effectively.

Factors that SPD should consider as it considers methods and procedures for storing its written directives include:

- ensuring the security of electronic data;
- making the directives as accessible as possible to SPD personnel;
- budget and resource limitations; and
- compliance with applicable MPAC standards.

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Procedures for storing written directives should be set forth in a written directive in accordance with MPAC 12.2.2 (which will be discussed in more detail in Chapter 3).

Recommendations for how SPD can utilize PM AM HCM to store its written directives are provided later in this section.

Developing an Accreditation Filing System

Each of the 162 MPAC Certification standards states the type of evidence that police agencies must provide in order to demonstrate compliance. In most cases, this evidence involves a written directive or other documentation, such as reports or forms, which are reviewed by the MPAC team during the assessment process. **Thus, in addition to deciding the best way to store all of its written directives, SPD must also determine the most effective way to compile and present this compliance documentation.**

MPAC requires that compliance documentation be prepared and presented in a “particular, uniform way” as part of an **accreditation filing system**, and has set forth specific, detailed instructions for how documents should be compiled and organized.²⁰ For example, MPAC requires that agencies create a separate file folder of documentation for each standard, that the folders be labeled in a certain way, that certain portions of the documentation must be highlighted, etc.

These requirements are discussed in detail in MPAC's “Getting Started” program manual, which was provided to SPD personnel during the April 2019 training. The manual provides step-by-step instructions for establishing an accreditation system and addresses topics that include:

- Hard copy vs. electronic filing systems
- When to set up an electronic filing system
- How to prepare the file folder for each standard
- How to access the template for printing file folder labels
- How to handle compliance documentation that is confidential or sensitive
- Approved methods for highlighting key language within the documentary evidence.

As SPD develops its accreditation filing system, it is imperative that the agency's Accreditation Manager (and anyone else involved in preparing documents for MPAC assessment) review this portion of the “Getting Started” manual in order to understand the full scope of the instructions that MPAC provides.

Recommendations for how SPD can use PM AM HCM to establish its accreditation filing system are provided later in this section.

²⁰ MPAC, “Getting Started” program manual, Tab 3 (provided by MPAC during April 2019 meeting).

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Disseminating Written Directives

Written directives will only be effective if they are reviewed and understood by agency personnel, so it is critical that police agencies develop a strong process for disseminating all new and revised directives. This process should include educating employees about the purpose and substance of the directives through briefings and trainings.

As discussed later in this section, SPD can use its electronic filing system, PM AM HCM, to disseminate directives, track their receipt, and record trainings that employees attend. Specific recommendations regarding the use of PM AM HCM are included in that discussion.

- ***Recommendation:*** When SPD issues a new or revised written directive, it should ensure that the directive is promptly disseminated to all affected personnel. Distribution of the directive should be accompanied by an explanation of the rationale behind its development. Supervisory and command-level personnel should be given advance notice and detailed information regarding the directive.
- ***Recommendation:*** SPD should provide training in connection with any new or revised written directives. These trainings can be done during roll call briefings, through informal briefings by supervisors, during regularly scheduled in-service trainings, as part of Field Training Officer (FTO) programs, and using online training.²¹ The form and extent of training will depend on the directive being issued; for example, some directives may require more hands-on training (e.g., the introduction of new types of equipment), and others may involve complex legal or reporting procedures that require lengthier classroom training sessions.

Leveraging the PM AM HCM Electronic Filing System

PM AM is a company that provides Information Technology (IT) services to clients from a variety of industries, including law enforcement agencies.²² PM AM developed PM AM HCM, which is a cloud-based electronic system that agencies can use to edit, store, and disseminate written directives and deploy and track training programs. Agencies can also use PM AM HCM to assist with accreditation and certification management, including preparation for audits and assessments.

PERF staff participated in an online demonstration of PM AM HCM and spoke with SPD and MPAC officials about the system. PERF learned that, although SPD already uses PM AM HCM to some extent, the agency could do more to take advantage of the many potential benefits that the system provides. These benefits include:

²¹ MPAC, "Getting Started" program manual, Tab 7 (provided by MPAC during April 2019 meeting).

²² PM AM HCM, <https://www.pmamhcm.com>.

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- Storing all written directives in a central location that is easily accessed by authorized personnel. This allows agencies to streamline the written directive system and organize it more efficiently and effectively.
- Allowing written directives to be edited and updated directly in the system. Appropriate personnel can be invited to collaborate in the editing process, and the previous versions of the document can be tracked and stored.
- Storing historical records of written directives, so that personnel can go back and look at all past versions of any given policy, form, GO, SOP, etc. that has been changed within the system.
- Enabling electronic acknowledgement of receipt and review of written directives by personnel.
- Linking SPD's written directives to MPAC's Certification standards for easy review and assessment.
- Deploying training programs and tracking personnel training records.
- Enabling agencies to solicit feedback from personnel regarding written directives and training.

One of the biggest advantages that PM AM HCM offers is its use for MPAC Accreditation and Certification management. According to PM AM HCM and MPAC officials, numerous Massachusetts law enforcement agencies use the system for this purpose,²³ and thus PM AM is well-versed in issues such as the MPAC standards, the Certification assessment and audit process, and the documentation needed to prove compliance.

Following is an overview of the steps for using PM AM HCM for MPAC Accreditation and Certification management:

1. **The agency uploads its written directives into PM HCM:** First, an agency uploads all of its current written directives into the PM AM HCM system. This puts everything in a central location that can be easily accessed by authorized people, and is a necessary first step for the Certification process.
2. **The agency links the MPAC Certification standards to the written directives:** PM AM HCM will automatically upload the current MPAC standards into the system and update them whenever a new version comes out. Agency personnel can click on a standard to pull up its requirements, and then can add a link to any written directives or training documents that are relevant to that particular standard. When preparing for an MPAC audit, the agency can go through each standard and upload the required proof of compliance directly into the link to the standard.
3. **MPAC auditors review the agency's proof of compliance:** Finally, MPAC assessors review the agency's proof of compliance for each standard, and either approve it or provide notes for what the agency needs to do to comply. Currently, agencies that use PM AM HCM for accreditation filing can either provide MPAC authority to access the system and review documentation electronically, or print out all of the documentation and provide MPAC with hard copies. PERF

²³ PM AM officials said that 116 agencies in Massachusetts use PM AM HCM.

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learned that PM AM is currently working with MPAC to update PM AM HCM so that agencies can prepare the documentation in the system and then click “submit audit” to send it directly to MPAC for review.

- ***Recommendation:*** SPD should continue using PM AM HCM to manage its written directive system, including storing and disseminating written directives. The agency should also utilize PM AM HCM as its accreditation filing system, as it provides an efficient and effective way to organize and present documentation for MPAC Certification assessment. Moving forward, SPD should take steps to use the many potential benefits that PM AM HCM has to offer. One way to do this is to take advantage of any trainings offered by PM AM, as well as trainings offered by MPAC regarding establishing and maintaining an accreditation filing system. PERF can help connect SPD personnel with officials from both organizations to facilitate training opportunities. SPD should also assign a dedicated staff member to take the lead on PM AM HCM management. This role, which could potentially be filled by SPD's Accreditation Manager, will be responsible for ensuring that the system is kept up to date and is utilized effectively by SPD personnel.

Evaluating and Updating Written Directives

After a police agency develops its written directive system, it must take steps to ensure that the written directives remain current, effective, and relevant. This section discusses the process of evaluating and updating written directives, including who should conduct the reviews, and what the reviews should entail.

Who should evaluate the written directives?

Much like the initial task of developing written directives, the ongoing process of evaluating and updating the directives must be an agency-wide effort.²⁴ Generally, the Accreditation Manager or an official from the agency's policy team should oversee the process, and the job of reviewing and updating specific written directives should be delegated to the division commanders responsible for the areas covered in each directive. When a division commander identifies written directives that need to be updated or revised, the commander should notify the person overseeing the evaluation process (e.g., the Accreditation Manager or policy manager) about those needs and suggested revisions.

MPAC's “Getting Started” program manual provides a sample policy from the Danvers (MA) Police Department that addresses who is responsible for reviewing, revising, and, when necessary, deleting specific written directives.²⁵ The policy includes a detailed matrix that lists each division commander (or other position) and which written directives that person is responsible for reviewing. For example, according to this policy, the Administrative Services Division Commander is charged with reviewing and

²⁴ MPAC, “Getting Started” program manual, Tab 7 (provided by MPAC during April 2019 meeting).

²⁵ MPAC, “Getting Started” program manual, Tab 7 (provided by MPAC during April 2019 meeting).

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providing feedback on 13 separate written directives, including those addressing Records, Planning & Research, Uniforms & Equipment, and Training.

What should evaluations of written directives include?

The scope and nature of a written directive will determine how frequently it should be evaluated and the issues that personnel should consider during the review. For example, directives that are highly significant to an agency's operations or that are affected by frequent changes to the law may need to be reviewed more regularly. Although MPAC does not set forth specific requirements for how frequently written directives should be evaluated, it does recommend that generally this review take place on an annual basis.

MPAC recommends that any agency personnel who are asked to review and comment on written directives be given direction on what is expected of them.²⁶ To that end, MPAC has prepared a checklist of questions to help guide reviewers as they evaluate the directives.²⁷ This checklist, which is included in MPAC's "Getting Started" program manual, includes the following questions:

- Does the new/revised policy conflict with an existing policy or law?
 - Should any "should" be changed to "shall" or any "shall" be changed to "should"? ("Shall" is a stronger word than "should" in terms of requiring employees to take a certain action, as opposed to merely recommending it.)
 - Does the policy accurately reflect what the agency does in practice? Is it agency-specific?
 - Are there any typos or incomplete sentences?
 - Is terminology correct? For example, if a form is cited in the directive, does it exist? Is it in use? Is the title on the form consistent with the title in the written directive?
 - Does the written directive *apply* to those *targeted (identified)* in the MPAC standard? For example, if the MPAC standard applies to "all employees," does the written directive also apply to "all employees" or is it limited to "all officers" only?
 - If the standard calls for a procedure, is there sufficient detail in the written directive for the task to be accomplished successfully?
 - Is the directive clear to the reader?
- ***Recommendation:*** SPD should create a written schedule and establish procedures for evaluating and updating its written directives. This is required for MPAC Certification and is important for ensuring that SPD's written directives remain current, effective, and relevant to SPD's operations. The schedule, which should be incorporated into a written directive, should specify the following:
- ***Frequency of review:*** Although MPAC does not mandate a specific timeline for how frequently directives should be reviewed, it does recommend that the review occur on

²⁶ MPAC, "Getting Started" program manual, Tab 7 (provided by MPAC during April 2019 meeting).

²⁷ MPAC, "Getting Started" program manual (provided by MPAC during April 2019 meeting).

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an annual basis. PERF agrees that an annual review will ensure that the directives are up to date.

- ***Who is responsible for the review:*** PERF recommends that SPD designate one person to oversee and manage the ongoing review process. This should be the Accreditation Manager or an official from the agency's policy development office. The responsibility for reviewing and updating specific directives should then be delegated to the division commanders responsible for the issues covered in the directive.
 - ***Procedures for documenting the review:*** MPAC standard 12.2.1 requires that agencies document the review of written directives. If no changes are required, this should be documented as well.
- ***Recommendation:*** SPD should create a checklist of items for reviewers to consider when they evaluate written directives. The checklist should be provided to all reviewers and should be updated as needed prior to each evaluation. This checklist should include, at a minimum, the questions outlined in the sample checklist provided by MPAC (discussed above). In some cases, the checklist should also include specific criteria that are tailored to the written directive. For example, written directives concerning the use of new equipment should be evaluated using specific criteria for assessing whether the equipment is being used properly and whether its use is having positive or negative results.²⁸

²⁸ Id.

Chapter 3. SPD's Compliance with MPAC Certification Standards

In order to achieve Certification through the Massachusetts Police Accreditation Commission (MPAC), the Springfield Police Department (SPD) will need to demonstrate compliance with each of the MPAC Certification standards. At the time of this report, there were 159 standards for Certification; however, the Sixth Edition of the standards, which was in the process of being finalized, will have 162 Certification standards. MPAC has provided preliminary information about the changes in the Sixth Edition, and PERF took these changes into account when conducting its analysis.

PERF analyzed the status of SPD's compliance with each of the current MPAC Certification standards and the new standards proposed in the Sixth Edition. For the cases in which SPD is not in compliance with a standard, PERF developed recommendations for what the agency can do to achieve compliance. When applicable, PERF also provided additional recommendations for strengthening SPD's written directive above and beyond what is required by MPAC.

PERF's analysis of SPD's compliance was based on:

- PERF's review of the written directives that SPD provided, which included the SPD Rules & Regulations (adopted 1981, amended 1983), which consist of 40 rules and regulations covering a variety of topics; and thousands of general orders (GOs) dating back to the late 1980s that supplement, clarify, replace, and update the Rules & Regulations. For each of the 162 MPAC Certification standards, PERF staff members searched these rules, regulations, and GOs to determine whether a relevant written directive existed that would demonstrate compliance with the standard. PERF then documented whether SPD was in compliance with the standard and outlined any steps that must be taken in order to achieve compliance.
- Ongoing discussions with SPD personnel.
- Information obtained during PERF's site visit to SPD on April 9, 2019.

To make this analysis more streamlined and user-friendly, PERF has presented its findings and recommendations in a detailed, user-friendly Compliance Log that is attached to this report as Appendix A.

This chapter describes how to use the Compliance Log. It also provides general guidance on drafting the content of written directives, and highlights some of the key recommendations from PERF's analysis.

The Compliance Log

The attached Compliance Log (Appendix A) contains PERF's detailed recommendations for how SPD can achieve compliance with the MPAC Certification standards. The Compliance Log also includes recommendations for how SPD can strengthen its written directives beyond MPAC's minimum requirements.

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During the April 9, 2019 briefing at SPD with PERF and MPAC officials, MPAC provided a template for a log that agencies can use to track compliance performance. The Compliance Log that PERF created, which is attached to this report as Appendix A, is based on the MPAC template. **Like MPAC's template, the attached Compliance Log is intended to be a "living document" that SPD can continuously update to reflect its progress towards MPAC Certification compliance.**

The Compliance Log is divided into separate rows for each of the MPAC Certification standards, and includes the following columns for each standard:

- **MPAC Standard** – the standard number and "C" to indicate it is required for Certification
- **MPAC Standard Subject Matter** – the title of the MPAC standard
- **Summary of Standard Requirements** – brief description of what the standard requires
- **Sixth Edition Changes** – summary of any known proposed changes in the Sixth Edition of the MPAC standards
- **Existing SPD Written Directive(s)** – a list of any existing SPD rules, regulations, policies, GOs, etc. that apply to the MPAC standard
- **Draft SPD Policy (if exists)** – a list of any existing draft written directives created by the former SPD official that apply to the MPAC standard
- **Required Proof of Compliance** – a list of the evidence that SPD will need to provide to demonstrate compliance with the standard (e.g., written directives, documentary evidence, observational items)
- **Is SPD in Compliance?** -- PERF's analysis of whether SPD currently complies with the MPAC standard (Yes/No/Partially)
- **What Must SPD do to bring Policy/Practices into Compliance?** -- PERF's recommendations for the steps that SPD should take to achieve compliance with the MPAC standard
- **Additional PERF Recommendations** – any additional recommendations for strengthening SPD's policies and practices regarding the topic, even if it is not needed to achieve compliance with the MPAC standard
- **Completion Status** – space for SPD to track its progress towards compliance with the standard
- **Assigned SPD Personnel** – space for SPD to designate a staff member who is responsible for overseeing efforts to achieve compliance with the standard
- **Notes** – any additional thoughts or information

Again, PERF recommends that SPD treat the Compliance Log as a "living document" that it can use to track its progress towards compliance with the MPAC Certification standards.

Recommendations for Drafting the Content of Written Directives

This section presents recommendations regarding broad perspectives that SPD should consider as it starts to draft or revise the language in individual written directives. **This guidance is intended to provide a larger view and major principles, while the Compliance Log will provide recommendations regarding specific content and language.**

- ***Recommendation:*** When drafting and revising its written directives, SPD should consult model policies and guidelines that are based on current research and progressive policing practices. For example, PERF has developed guidance on issues such as police use of force, the use of technologies such as body-worn cameras, and conducting effective investigations.
 - SPD should also consult sample written directives from other police agencies, especially agencies in Massachusetts that have already achieved MPAC Accreditation or Certification.
 - SPD should also look to local, state, and federal laws and regulations to ensure that SPD's written directives are legally valid, and should determine whether any new written directives conflict with existing collective bargaining agreements, intergovernmental agreements and contracts, or mutual aid agreements. In the event of a conflict, SPD should determine the best way to resolve the issue, whether that requires changes in its directives, or changes in existing agreements.

- ***Recommendation:*** As mentioned throughout this report, PERF strongly recommends that when SPD drafts its written directives, it should consult the language and format of the proposed directives already drafted by the former SPD official. In many cases, these draft directives can be adopted with no or minimal changes.

- ***Recommendation:*** Another useful resource for drafting written directives is the *Massachusetts Police Accreditation Network*, MPAC's private website.²⁹ This website, which is intended for leaders and accreditation managers from police departments participating in MPAC programs, provides users with links to MPAC resources and serves as a forum for users to connect with one another to share policies and other information. SPD personnel can search the site to find examples of written directives from other Massachusetts law enforcement agencies that have achieved (or are in the process of achieving) MPAC Accreditation or Certification.

- ***Recommendation:*** Each MPAC standard includes checklists of the evaluation measures that MPAC will use when assessing compliance with the standard. PERF utilized these checklists when conducting its analysis, and **SPD should also use these checklists as it drafts and revises**

²⁹ *Massachusetts Police Accreditation Network*, http://mpac.communityzero.com/mpac?invitation_key=232-165C4BF90C7.

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written directives. In many cases, the checklists will give MPAC an exact list of items that it will need to include in its directives in order to comply with the standards. MPAC's "Getting Started" program manual, which was provided to SPD during the April 9, 2019 site visit, includes more information on how to read and understand the standards.

- ***Recommendation:*** When making changes to its policies and practices in order to achieve compliance, MPAC recommends that agencies first address the standards that pertain to written directives (Standards 12.2.1 and 12.2.2) before moving on to any others. MPAC recommends prioritizing addressing any standards that pertain to high-liability areas, such as Use of Force (Chapter 1), Vehicular Pursuits (Chapter 41), Holding Facility (Chapter 72), and Property and Evidence Control (Chapter 84).
- ***Recommendation:*** SPD should ensure that any new or revised written directives are: consistent, both internally and throughout the entire written directive system; clear and concise; framed in a positive way to focus on what personnel *should* do, not just what they should *not* do; focused on preventing problems and using positive reinforcement/training to solve problems; and consistent with professional policing practices, relevant local, state, and federal laws, and SPD's own training materials.

Overview of PERF's Use-of-Force Recommendations

Some of the most critical and complex recommendations in the Compliance Log involve the MPAC standards regarding the police use of force (Standards 1.3.1 through 1.3.13). While many of MPAC's other standards are related to operational processes and procedures, the ones involving use of force are more substantive and have the potential to have far-reaching impacts for SPD.

PERF therefore believes that it is useful to highlight its use-of-force recommendations here, even though they are also presented in the Compliance Log. **These recommendations go beyond the MPAC requirements and are intended to help SPD draft use-of-force policies and procedures that are in line with current research and progressive policing practices.** The recommendations are based on PERF's extensive work on use-of-force issues, including the *Guiding Principles on Use of Force*³⁰ that PERF published in 2016 to give police agencies specific guidance on use-of-force policy, training, tactics, equipment, and information needs.

Rethinking Use-of-Force Policies, Practices, and Tactics

Leading police departments work to strengthen their relationships with the community and to ensure that the sanctity of human life is at the heart of everything they do. This means examining use-of-force

³⁰ Police Executive Research Forum. 2016. *Guiding Principles on Use of Force*. <http://www.policeforum.org/assets/guidingprinciples1.pdf>

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policies, practices, and training to make sure that they reflect the core ideal of preserving the lives of everyone – including officers and the people they are charged with serving and protecting.

The U.S. Supreme Court's ruling in *Graham v. Connor*³¹ establishes a general standard of "objective reasonableness" regarding police use of force. Objective reasonableness represents the legal standard by which police use of force is judged by the courts. However, *Graham* provides only a few sentences to guide police departments about how to put that standard into effect.

Many police departments have chosen to go beyond the bare requirements of *Graham*. For example, many police agencies have detailed policies and training on issues such as prohibitions against shooting at moving vehicles, rules on pursuits, guidelines on the use of Electronic Control Weapons, and other use-of-force issues that are not required by *Graham*. Many of PERF's *Guiding Principles on Use of Force* consist of policies and practices that build upon the bedrock of *Graham* in order to achieve better outcomes, including the following:

- Establishing the concept of the sanctity of human life as the basis of what police agencies do;
- Requiring that police uses of force meet a test of proportionality;
- Adopting de-escalation as formal agency policy;
- Teaching officers how to use a Critical Decision-Making Model to assess critical incidents;
- Establishing a "duty to intervene" to prevent officers from using excessive force;
- Rendering first aid following a use of force;
- Prohibiting use of lethal force against persons who pose a danger only to themselves;
- Using "distance, cover, and time" to slow down critical incidents in order to give officers time to work toward resolving them peacefully, rather than using outdated concepts such as the "21-foot rule" and "drawing a line in the sand";
- Using effective communications to de-escalate incidents;
- Implementing comprehensive training of officers to deal with persons with mental health issues;
- Requiring sergeants or other supervisors to respond to critical incidents, whenever possible, to reduce the likelihood of unnecessary force;
- Using scenario-based training to help officers improve their response to challenging situations;
- Documenting use-of-force incidents and reviewing data and enforcement practices to ensure they are fair and non-discriminatory.³²

Recommendations for Strengthening SPD's Use-of-Force Written Directive

The attached Compliance Log contains an extensive, step-by-step analysis of SPD's use-of-force directives and whether they comply with the MPAC Certification standards. SPD's directives are mostly in compliance with the standards. However, the MPAC standards generally require only a basic policy and then give agencies the discretion to fill in the details. Or as MPAC points out on its website, its

³¹ *Graham v. Connor*, 490 U.S. 386 (1989). <http://caselaw.findlaw.com/us-supreme-court/490/386.html>.

³² Police Executive Research Forum (2016). *Guiding Principles on Use of Force*. <http://www.policeforum.org/assets/guidingprinciples1.pdf>.

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standards “prescribe ‘what’ agencies should be doing but not ‘how’ they should be doing it. That decision is up to each agency to make.”³³

In light of this, PERF identified several ways in which SPD's use-of-force written directive could be improved so that it is more comprehensive, user-friendly, and aligned with progressive policing practices and current research regarding the police use of force. **These recommended changes, though not necessary to comply with MPAC's Certification Standards, will strengthen SPD's overall use-of-force policies and practices.** The concepts described in the recommendations below, which are also discussed in detail in the Compliance Log, should also be incorporated into all of SPD's policies, practices, and training on use of force.

- **Recommendation:** SPD should **create a single comprehensive written directive** that includes all of the agency's policies and procedures related to the use of force. This would result in a clearer, more streamlined document. This directive should be included in the new policy-procedure manual that PERF recommends SPD create, as discussed throughout this report.
 - Ideally, the comprehensive use-of-force written directive should be organized in a manner such as the following:
 - Philosophy and Introductory Discussion
 - Definitions
 - Policies and Procedures Regarding Lethal Force
 - Policies and Procedures Regarding Less-Lethal Force
 - Less-Lethal Tools
 - Reporting and Investigation Procedures
 - Supervisor Responsibilities
 - Injury/Medical Considerations
 - Training and Certification
 - SPD's current general orders that should be merged into this new comprehensive directive include G.O. 100.20 (Use of Force) and G.O. 500.75 (Reporting the Use of Deadly Force and Less Lethal Force Tools).
 - When determining what to include in a comprehensive use-of-force written directive, SPD should consult OP-101 (Police Use of Force), the proposed directive that was drafted by the former SPD official. OP-101 provides a good example of the type of topics that SPD should include in its new comprehensive use-of-force directive, as well as how such a directive should be organized. (PERF addresses the substantive aspects of OP-101 in various sections throughout this report.)

- **Recommendation:** At the beginning of its new comprehensive use-of-force written directive, SPD should add language emphasizing **the sanctity of all human life**, including the lives of the general public, police officers, and criminal suspects.³⁴ This concept, which stresses the

³³ MPAC, <https://masspoliceaccred.net/standards/>.

³⁴ PERF, *Guiding Principles*, p. 34.

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importance of treating all persons with dignity and respect, should be incorporated throughout all of SPD's mission statements, policies, and training.

- For example, the Las Vegas Metropolitan Police Department's policy states: "It is the policy of this department that officers hold the highest regard for the dignity and liberty of all persons, and place minimal reliance on the use of force. The department respects the value of every human life and that the application of deadly force is a measure to be employed in the most extreme circumstances."³⁵
- **Recommendation:** SPD should adopt **de-escalation** as formal agency policy, and language should be added to its use-of-force written directive to reflect this approach.³⁶ The directive should state that de-escalation is the preferred, tactically sound approach in many critical incidents.
 - The directive should also require officers to receive training on key de-escalation principles. Many agencies already provide crisis intervention training as a key element of de-escalation, but crisis intervention policies and training must be merged with a new focus on tactics that officers can use to de-escalate situations.
 - De-escalation policy should also include discussion of proportionality, using distance and cover, tactical repositioning, "slowing down" situations that do not pose an immediate threat, calling for supervisory and other resources, and related concepts.
 - For example, the Seattle Police Department's policy states that "When safe under the totality of the circumstances and time and circumstances permit, officers shall use de-escalation tactics in order to reduce the need for force."³⁷
- **Recommendation:** SPD should add a statement regarding **the duty to intervene** to this section of the use-of-force policy.³⁸ This statement should include the following language: "Officers have a duty to intervene if they anticipate or observe the unreasonable, unnecessary, or disproportionate use of force."
- **Recommendation:** SPD should add a definition of "**Proportionality**" to its new "definitions" section in the comprehensive use-of-force written directive. The definition of "proportionality" should state that proportionality involves officers: (1) using only the level of force necessary to mitigate the threat and safely achieve lawful objectives; (2) considering, if appropriate, alternate force options that are less likely to result in injury but will allow officers to achieve lawful objectives; and (3) considering the appropriateness of officers' actions.
 - The concept of proportionality does not mean that officers, at the moment they have determined that a particular use of force is necessary and appropriate to mitigate a threat, should delay their response in order to consider how their actions will be viewed

³⁵ PERF, *Guiding Principles*, p. 34.

³⁶ PERF, *Guiding Principles*.

³⁷ Seattle Police Department (2015). "Title 8 – Use of Force ('Use of Force Core Principles')." .

<http://www.seattle.gov/police-manual/title-8---use-of-force/8000---use-of-force-core-principles>

³⁸ PERF *Guiding Principles*, p. 41-42

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by others. Rather, officers should begin considering what might be appropriate and proportional as they approach an incident, and they should keep this consideration in their minds as they are assessing the situation and deciding how to respond.

Proportionality also considers the nature and severity of the underlying events.³⁹

- **Recommendation:** SPD should add a definition of “**De-escalation**” to its new “definitions” section in the comprehensive use-of-force written directive. The definition of “de-escalation” should emphasize proportionality, the use of distance and cover, tactical repositioning, “slowing down” situations that do not pose an immediate threat, calling for supervisors and other resources, and similar actions and tactics.⁴⁰
- **Recommendation:** SPD should add language to its comprehensive use-of-force written directive section stating that force used by officers should be **proportional to the threat**. In assessing whether a response is proportional to the threat being faced, officers should consider the following factors:
 - Whether the level of force is necessary to mitigate the threat and safely achieve a lawful objective;
 - Whether there is another, less injurious option available that will allow the officer to achieve the same objective as effectively and safely; and
 - Whether the officer’s actions will be viewed as appropriate given the severity of the threat and the totality of the circumstances.
- **Recommendation:** SPD should also consider revising its current policy regarding **shooting at or from a moving vehicle**. SPD’s current firearms policy (G.O. 500.10) states: “Firing at or from moving vehicles is prohibited except as the ultimate measure of self defense of himself/herself or another; or to defend himself/herself or another from death or serious physical harm when the suspect is using deadly force. Experience shows firing at or from moving vehicles is rarely effective and is extremely hazardous to innocent persons.” SPD should change this policy to: *“Shooting at or from a moving vehicle is prohibited unless someone inside the vehicle is using or threatening lethal force by means other than the vehicle itself. The only exception is an apparent act of terrorism when the vehicle is being used as a weapon of mass destruction.”*
 - Many police agencies have adopted strict prohibitions on shooting at or from a moving vehicle when the vehicle itself is the only “weapon” being used against officers.⁴¹ Agencies have found that the number of police shootings was significantly reduced by enacting this type of absolute prohibition.

³⁹ PERF, *Guiding Principles*, pp. 38-40..

⁴⁰ PERF, *Guiding Principles*, pp. 54-65.

⁴¹ For example, agencies with this policy include the following: the New York City Police Department (which adopted it in 1972); the Boston Police Department; the Cincinnati Police Department; the Denver Police Department; the Philadelphia Police Department; and the Washington, DC Metropolitan Police Department. Discussion and citations available in *Guiding Principles on Use of Force*, p. 44-47.

<http://www.policeforum.org/assets/guidingprinciples1.pdf>

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- However, PERF recognizes the recent trend of using motor vehicles as a weapon of mass destruction. This has been observed both internationally and within the United States. PERF understands that this type of threat may require an extraordinary response to stop the threat and protect life. If this event were to occur within the City of Springfield, any use of force, particularly lethal force, must be evaluated based on the totality of the circumstances and the necessary, reasonable, and proportional use of force.

Conclusion

Conclusion

The Springfield Police Department (SPD) has already taken several important steps towards achieving Certification by the Massachusetts Police Accreditation Commission. For example, SPD personnel have attended MPAC orientation training sessions, obtained access to MPAC's private community website, completed the application for Certification, and reviewed whether the agency is eligible to seek waivers for any of the Certification standards. Additionally, SPD has hired a full-time accreditation manager to coordinate the Certification process, which is a move that both PERF and MPAC strongly commend.

SPD's next step will be to bring its written directives, procedures, and practices into compliance with the 162 MPAC Certification standards. The findings and recommendations provided in this report will help SPD as it completes this complex task.

Some of the key points that SPD should consider as it moves forward with this process include:

- SPD should create a **centralized, comprehensive policy-procedure manual** that contains all of the written directives regarding administrations and operations that apply agency-wide (e.g., code of conduct, use of force, forms and reporting, uniforms and equipment, chain of command, training, etc.). SPD should also create operational manuals that apply to specific units or functional areas (e.g., criminal investigations, internal investigations) that can be included in the overall policy-procedure manual or lifted out as needed. SPD should merge its current written directives (the Rules & Regulations manual and the thousands of GOs) so that all outdated and superseded directives are removed.
- SPD should **use the draft policy-procedure manual created by the former SPD official as a guide** when overhauling its written directive system. The draft Table of Contents provides a strong template for how the new manual should be organized and what topics it should include, and in many cases, the draft written directives – which were written with an eye towards MPAC compliance – can be adopted with minimal or no changes. When revising and drafting its written directives, SPD should also consult the resources provided within this report, the Chelsea (MA) Police Department's written directives, and the sample policies posted on MPAC's community website.
- SPD should **consider using the services provided by Information Mapping** to help format and design its written directives. If SPD does not want to pay for the Information Mapping service, it should use the Massachusetts State Police written directives as a template for formatting and design. An example of a Massachusetts State Police written directive is attached to this report in Appendix D.
- SPD should **continue using PM AM HCM to manage its written directive system**, including storing and disseminating written directives. The agency should also utilize PM AM HCM as its accreditation filing system, because it provides an efficient and effective way to organize and present documentation for MPAC Certification assessment.

Conclusion

- PERF has analyzed SPD's compliance with the 162 MPAC Certification standards and has presented its findings in a detailed Compliance Log (attached to this report as Appendix A). **SPD should use this Compliance Log to track its progress towards compliance.** This will make the process easier as SPD moves through the remaining phases of the Certification process.
- SPD should be sure to **consult the checklists contained in each MPAC standard** to understand exactly what is required to achieve compliance with the standard. For example, the checklists include details regarding each element that will need to be included in a written directive, each type of documentation that will need to be presented to prove compliance, etc. SPD should also be sure to refer to MPAC's "Getting Started" program manual for additional instructions.

By seeking MPAC Certification, SPD is demonstrating that it is willing to be held to a set of rigorous professional standards. This commitment to accountability and transparency is critical for strengthening SPD's service to the community.

Appendix A: The Compliance Log

This Compliance Log presents PERF's findings and recommendations regarding SPD's compliance with the 162 MPAC standards for Certification. SPD can use this Compliance Log to track its ongoing efforts towards achieving compliance with the standards. A description of the Compliance Log, along with guidance on how to use it, can be found in Chapter 3 of the report.

Appendix B: Resources

Appendix B: Resources

IACP National Law Enforcement Policy Center, Written Directive System Model Policy (April 2002, October 2004), www.iacepnet.com

Information Mapping website, <https://www.informationmapping.com/en/>.

Massachusetts Chiefs of Police Association website, <https://www.masschiefs.org/>.

Massachusetts Police Accreditation Commission website, <https://masspoliceaccred.net/>.

Massachusetts Police Accreditation Network,
http://mpac.communityzero.com/mpac?invitation_key=232-165C4BF90C7.

Orrick, W. Dwayne, *Best Practices Guide for Developing a Police Department Policy-Procedure Manual*. International Association of Chiefs of Police, <https://www.theiacp.org/sites/default/files/2018-08/BP-PolicyProcedures.pdf>.

PM AM HCM Website, https://www.pmamhcm.com/law_enforcement.html.

Police Executive Research Forum (2016). *Guiding Principles on Use of Force*.
<http://www.policeforum.org/assets/guidingprinciples1.pdf>.

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http://www.policeforum.org/assets/docs/Free_Online_Documents/Leadership/legitimacy%20and%20procedural%20justice%20-%20a%20new%20element%20of%20police%20leadership.pdf.

Police Executive Research Forum and COPS Office (2011). *2011 Electronic Control Weapons Guidelines*.
http://www.policeforum.org/assets/docs/Free_Online_Documents/Use_of_Force/electronic%20control%20weapon%20guidelines%202011.pdf.

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.
http://www.cops.usdoj.gov/pdf/taskforce/taskforce_finalreport.pdf.

Appendix C: Draft Table of Contents for SPD Policy-Procedure Manual

An SPD official (who has since retired) began the process of revising SPD's written directive system with an eye towards achieving MPAC Certification. He drafted a Table of Contents for a proposed policy-procedure manual, along with several written directives that comply with MPAC standards. SPD can use this draft Table of Contents as a template for how its new policy-procedure manual should be organized and what topics it should include.

Appendix D: Massachusetts State Police – Sample General Order

MPAC provided PERF with a General Order (GO) from the Massachusetts State Police to serve as an example of an effectively designed and formatted written directive.