



# COMPLIANCE EVALUATOR REPORT

April 2025

O'Toole Associates, LLC  
[www.spdcomplianceam.com](http://www.spdcomplianceam.com)

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## Lead Compliance Evaluator Message

I am pleased to present the Compliance Evaluator Team's ("CET") fifth report related to the [Settlement Agreement](#) between the United States Department of Justice ("DOJ") and the City of Springfield, MA ("City") filed on April 13, 2022. This document covers developments during the final two quarters of Calendar Year 2024. It also provides general commentary on the process to date and the compliance plan going forward.

The parties continue to work very collaboratively to address outstanding requirements. The City has made significant strides by increasing its capacity to manage the demanding compliance process. The Professional Standards Unit, led by Captain Brian Beliveau, has worked tirelessly to develop and implement new policies and training and to enhance important community relationships. The quality of personnel assigned to that unit is outstanding and they have been very receptive to input and feedback from the CET, DOJ, and community stakeholders. Superintendent Lawrence Akers and City Attorney Buoniconti provide strong leadership and personally participate in regular meetings and discussions.

As noted in previous reports, community members and organizations have engaged enthusiastically in the process. In addition to SPD's ongoing C3 community engagement program, the in-person and remote events co-hosted by Pioneer Valley Project, Mass Senior Action, and the NAACP, have been highly organized and well attended.

Going forward, the CET will continue to assess outcome measurements and audit cases related to use of force and internal investigations to ensure that new policies, enhanced training, improved supervision, and accountability measures have taken root, produced the desired effects, and will be sustained going forward.

Once again, sincere thanks to the members of the Springfield Police Department, sworn and non-sworn, who have engaged with our team and have demonstrated a commitment to professionalism and continuous improvement. The many positive results outlined in this report reflect their efforts.

If readers have any questions, comments, or concerns about the content in this report or the ongoing compliance process, please [contact our team](#). Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Kathleen O'Toole". The signature is fluid and cursive, with the first name and last name clearly legible.

Kathleen O'Toole

## Requirements Completed To Date

First, it is important to acknowledge progress to date. In this section, the CET will provide an overview of several requirements in the Settlement Agreement that have been completed since the Settlement Agreement was executed in April 2022. The parties have devoted considerable effort to these areas, and the City and SPD have made significant progress in each. The CET is now monitoring these categories and conducting audits to ensure the City sustains these reforms.

- **USE OF FORCE POLICIES** – As indicated in previous reports, new use of force policies were developed during the early stages of this project. These modern, comprehensive policies provide clear guidance to officers operating in the field to ensure they are doing so professionally and according to federal and state law. As policies are updated, the SPD should promptly post the latest updates on its website.
- **USE OF FORCE TRAINING** – Policies are likely to be ineffective unless reinforced by robust training. The CET has encouraged the SPD to develop modern training curricula that align with adult learning principles. The SPD Professional Standards Unit and the Training Unit have worked closely with DOJ and the CET to evolve their training. The CET has been particularly pleased with the incorporation of scenarios into the training modules. Training bulletins, literature, lectures, and slide presentations certainly contribute to learning, but live and video scenarios also afford officers the opportunity to test their knowledge in a practical context. The CET will continue to observe and monitor relevant training throughout the duration of this project.
- **USE OF FORCE SUPERVISORY TRAINING** – CET audits along with reviews by Professional Standards Unit personnel have identified areas for improvement in force investigation, review and reporting. SPD incorporated these learning points into the 2024 General Supervisory Training delivered to all supervisors and has incorporated more recently identified points into the soon to be delivered 2025 General Supervisory Training. This training has been developed incorporating adult learning principles. The CET will continue to observe and monitor relevant training throughout the duration of this project.
- **USE OF FORCE AND INTERNAL INVESTIGATIONS UNIT (IIU) AUDITS** – The CET developed two audit tools to capture qualitative and quantitative data to inform its review of individual cases involving use of force and/or police misconduct. In previous reports, the CET noted concerns relative to training and supervision that were identified when conducting the reviews. Working with the parties, we established a baseline for formal compliance reviews starting in 2023. The results of the 2024 reviews to date will be presented later in this report. These audits will assist the CET in determining if the City has achieved and maintained compliance.
- **USE OF FORCE COMMITTEE CREATION AND TRAINING** – Under the Agreement, SPD was required to create a Use of Force Committee to critically review cases, not only to determine if policy violations have occurred, but also to inform changes in policy and training that may be required. The CET and DOJ worked closely with SPD as this committee was being designed and trained.

- **FORCE INVESTIGATION POLICY** – A policy outlining requirements for the investigation of all use of force cases, including those to be investigated by a Force Investigation Trained (FIT) Supervisor, has been developed and approved. The CET and DOJ provided technical assistance to SPD during the drafting process and ultimately granted approval, as required in the Settlement Agreement. The SPD should now post this policy on its website.
- **FORCE INVESTIGATION SUPERVISORS' MANUAL** – A manual providing clear guidance to supervisors and commanders who are required to conduct investigations of the most serious force incidents under the new Force Investigation policy was also developed and approved.
- **ELECTRONIC RECORDS MANAGEMENT SYSTEM FOR USE OF FORCE REPORTS** – The City adopted an electronic system for the collection and processing of UOF reports and investigations.
- **DATA COLLECTION ANALYSIS COORDINATOR FOR USE OF FORCE** – The Professional Standards Unit has enthusiastically assumed this responsibility. The CET has been pleased with their commitment and performance to date.
- **DATA COLLECTION AND ANALYSIS PROTOCOL** – *SPD* has developed systems to track and analyze use of force and IIU complaints. (Note: While the protocol and coordinator are now in place, some data analysis must be completed.)
- **FORCE ANALYSIS / TREND ASSESSMENT BY DATA ANALYSIS COODRINATOR** – Data regarding the use of force by SPD personnel has been publicly reported on SPD's website. (Note: As above, appropriate data analysis must be completed.)
- **INTERNAL INVESTIGATIONS UNIT (IIU) POLICY** – As noted in previous reports, a new policy related to Internal Investigations has been completed. Some training has taken place, but ongoing training will be essential.
- **INTERNAL INVESTIGATIONS UNIT (IIU) MANUAL** – A manual was developed to provide guidance to those responsible for conducting IIU investigations.
- **INTERNAL INVESTIGATIONS UNIT (IIU) MANUAL TRAINING** – IIU personnel have attended some training offered by a reputable external instructor. Ongoing training will be required for current and new investigators assigned to the unit.
- **GENERAL SUPERVISORY TRAINING** - The CET and DOJ have supported the Professional Standards Unit as it created the curricula for training modules delivered annually to all police supervisors. The CET and DOJ also attended training and have been impressed by improving quality and level of participation.
- **PROMOTIONS POLICY** – A promotions policy that essentially mirrors Massachusetts State Law and Civil Service guidelines was published. A training session on the guidelines must now be developed.

- **PEER-TO-PEER POLICY** – A policy on peer-to-peer engagement to promote officer wellness was developed and approved. Such programs are designed to provide support to officers who experience job-related trauma and stress.
- **FIELD TRAINING POLICY** – A policy outlining the requirements of the Field Training program for new officers was developed and approved. A robust field training program is essential to bridge the theoretical knowledge recruits acquire during the academy and practical application of their skills in the field. The CET will monitor progress to ensure SPD is recruiting and training senior officers who are capable of guiding and mentoring new members of SPD.
- **EARLY INTERVENTION SYSTEM (EIS) PROTOCOL** – A policy documenting the requirements and protocols of SPD's early intervention system was developed and approved. The EIS is designed to identify officers who may need counseling, training, mentoring, or other appropriate intervention. Prompt action can prevent future incidents that might require discipline. The next step for SPD will be the implementation of the EIS.
- **BOARD OF POLICE COMMISSIONERS (BPC) MANUAL** – A manual to provide guidance to the Board of Police Commissioners was developed by the parties, posted for public comments and feedback, and approved by the CET.
- **BOARD OF POLICE COMMISSIONERS (BPC) ANNUAL REPORT** – An annual report was issued by the Board of Police Commissioners. It provides an overview of BPC operations, cases, and dispositions. These reports will be published annually.
- **BOARD OF POLICE COMMISSIONERS (BPC) ANNUAL PUBLIC MEETING** – BPC Annual Public Meetings are now being held. These meetings provide community members opportunities to engage with Board members and provide feedback.
- **BOARD OF POLICE COMMISSIONERS (BPC) QUARTERLY SUMMARIES** – Quarterly summaries of BPC activity, cases, and dispositions were published for each quarter in 2024. This is a timely process for keeping the community informed of BPC actions.
- **POSTING BOARD OF POLICE COMMISSIONERS (BPC) TERMS, VACANCIES, PROCESS FOR SERVING** – These requirements were met when BPC vacancies last occurred. The City has committed to continuing this process.
- **ELECTRONIC TRACKING SYSTEM FOR TRAINING** – The City now has the capability to track electronically all training officers receive, both Massachusetts state requirements and Springfield specific training.
- **SPD QUARTERLY COMMUNITY ENGAGEMENT MEETINGS** – In addition to neighborhood C3 meetings that take place regularly throughout the year, the SPD has worked closely with the Pioneer Valley Project, MA Senior Action, and the NAACP to host well-attended quarterly

meetings, both remote and in-person. Recognizing there is always room to enhance relationships and trust between the police and the community, police commanders and community leaders have committed to evolving their strategy to reach a wider range of community members and to ensure this commitment is instilled in the culture and operations of the SPD going forward.

- **SPD COMMUNITY ENGAGEMENT REPORT** – As required, the SPD now publishes an annual community engagement report that provides an overview of its activity. Because the community engagement strategy was evolving, the first report covering 2023 was not published until early 2025. SPD has committed to timely reporting for 2024 and subsequent years.
- **WRITTEN TRAINING PLAN** – The Professional Standards Unit worked collaboratively with the Academy and Training Division to prepare a comprehensive training plan that outlines all content provided to recruits and SPD officers of all ranks.
- **TRAIN SELECTED FIELD TRAINING OFFICERS** - This requirement had been delayed in collective bargaining but has now been resolved. Selections have taken place and training has been offered. The program will launch on May 5<sup>th</sup> following the graduation of the recruit class.

## Use of Force, and Force Reporting, Investigation and Review

The CET has completed its audit of 2024 Use of Force cases and has attended two meetings of the Use of Force Committee responsible for critically evaluating force application incidents and force investigations. We find that SPD has made tremendous progress in 2024 by addressing approximately two thirds of the Settlement Agreement provisions directly related to Use of Force (these requirements are contained in paragraphs 19 through 76 of the SA.) This progress is a testament to the leadership provided by Superintendent Akers and the members of the Professional Standards Unit, and the adoption of these new standards by members and supervisors throughout SPD.

### History

As noted in previous reports, SPD's updated Use of Force policies went into effect in February of 2023. Minor updates and clarifications in some of those policies were completed in 2024. These force policies cover many areas including:

- Requiring de-escalation when feasible before using force,
- Clarifying when officers are permitted to use force,
- Requiring more thorough and detailed reporting of use of force by officers,
- Requiring thorough investigations of force by uninvolved supervisors, and
- Ensuring critical reviews of force applications are conducted by the uninvolved supervisor, a commander and in some cases by the Use of Force Committee (UFC).

In addition to publishing the force policies, SPD conducted training to familiarize officers and supervisors with their provisions. This training initially involved roll call, video and classroom training. Additional scenario-based training was delivered to all SPD members in their annual 2023-2024 training cycle.



Supervisors and commanders were given specific guidance regarding their roles in force investigation and review during their General Supervisors Training in the 1<sup>st</sup> quarter of 2024.

Our baseline audit of 2023 Use of Force revealed numerous areas requiring SPD's focused attention (refer to our [February 2024 report](#) for details regarding our baseline audit.) Even though the majority of incidents involved tactics, professionalism, or policy issues which supervisors were required to identify and address, supervisors did not routinely identify and document these in our baseline audit. Officer reports often lacked required detail about their observations, actions and decision making, and supervisors did not consistently take investigative steps required by policy. Lastly, supervisors are required to analyze each force application to determine whether it was reasonable, necessary, proportional, and consistent with policy, but this analysis was rarely done, and none of the incidents the CET found inconsistent with policy were identified by supervisors.

After supervisors review each use of force, serious force incidents as well as a sampling of lower-level force cases are sent to the Use of Force Committee (UFC) to conduct a thorough review, looking for incident specific issues as well as department-wide learning points and improvement opportunities. The CET attended an early attempt to convene the Use of Force Committee in 2023, but required training had not been completed for the members and they were not yet equipped to fulfill their duties. The UFC was not convened again until the 4<sup>th</sup> quarter of 2024 after specific training, policy, and procedures had been developed and delivered.

## Progress

In the CET's 2024 use of force audit, the CET reviewed thirty-two incidents in which reportable force was used. While we review individual incidents to gauge compliance and progress, our focus is on processes, systems and patterns. Significant improvements were found throughout our audit, including the following:

- SPD developed templates for officer reporting including prompts reminding officers to include required details in their use of force reports. These templates are living documents and SPD is continuing to modify and update these as potential improvements are identified.
- Supervisory investigations are more thorough. Supervisors almost always (85%) responded to the scene of force applications when required. They looked for private video, interviewed witnesses, and ensured photographs were taken of the subject and scene more frequently than in the baseline audit.
- Supervisors are more frequently evaluating force applications critically. In many of the 2024 cases reviewed, supervisors identified coaching opportunities regarding tactics, de-escalation, and/or professionalism. Additionally, there were four cases in which the supervisor identified that the use of force was not consistent with policy.
- Supervisors within the Professional Standards Unit (PSU) are critically evaluating force applications and investigations. Once the investigating supervisor and commander review a force incident, they forward all documentation to the Professional Standards Unit. Supervisors within PSU review the file and, when investigations are not complete or sufficient, return the case file to the involved officer and/or supervisors for additional information and correction. There were many investigative files returned for additional work due to this process, and this helped improve the quality of the final investigation.



- SPD is working to proactively share learning points with all personnel. The PSU has issued several training updates to all personnel through its online training portal, PowerDMS, and is continuing to use this mechanism to provide timely training related to force application and investigation.
- The Use of Force Committee (UFC) is running well. SPD conducted training for UFC members in the 4<sup>th</sup> quarter of 2024. After the training was completed, two UFC meetings were held reviewing 2024 force incidents. In each case reviewed, the UFC identified key tactical, policy, and training issues and directed follow-up actions as appropriate. Representatives of the Board of Police Commissioners also attended these meetings.
- SPD is using the force investigation and review process to help make improvements in the organization and to improve professionalism.
- The SA prohibits officers from using force on handcuffed subjects except in limited circumstances. This created a challenge identified in our baseline audit in which officers were not universally clear about how to move physically uncooperative and unwilling subjects into a police vehicle for transport without using force. SPD developed and is in the process of delivering training to address this topic.

### **Use of Force Areas for Improvement**

The 2024 audit identified the following key areas for improvement:

- More thorough evaluation by reviewing supervisors is necessary (SA ¶ 45, 47, 54, 58, 67(l).) Although significant progress has been made in this area, supervisors are required to identify tactical and policy issues, and the department would also benefit if they identified and recognized commendable behavior. When issues of concern are observed, supervisors are required to address those concerns and document how they handled them, whether through coaching, counseling, training, or screening the incident with the superintendent, and referring serious cases to IIU.
- FIT training needs to be identified and delivered. The SA requires FIT-trained supervisors investigate the most serious (level 5) force incidents (SA ¶ 63-67). In 2024, SPD finalized the FIT manual but has not yet selected FIT supervisors or finalized the training plan for them. This training is intended to equip these supervisors with a higher level of preparedness and skill to investigate and evaluate serious force incidents.
- Officers must clearly articulate the reason for each use of force and document their efforts to de-escalate the situation (SA ¶ 35.) The audit found these requirements met in most cases but force articulation was not complete in 25% of the incidents and de-escalation documentation did not satisfy requirements in 22% of the incidents.
- Officers have been equipped with body worn cameras. They are required to notify subjects they are being recorded, but this was rarely observed in the audit (SA ¶ 171). Additionally, if officers activate their cameras late or fail to activate them, they are required to report this to their supervisors and document it in their reporting, and supervisors are required to address these BWC policy violations (SA ¶ 45, 171-172.) There was no documentation of supervisory actions or counseling related to BWC violations noted in the audit and limited documentation by officers.
- Officers are required by policy to attempt to de-escalate potential force situations with non-force alternatives when feasible and practical (SA ¶ 20.) There were seven cases identified in

the audit where this did not happen. Additionally, the SA requires that officers give subjects an opportunity to comply with verbal commands before using force, but cases were identified where clear commands were not given prior to force being applied.

- Officers are prohibited from using force against handcuffed subjects except in limited circumstances (SA ¶ 23.) The audit identified a small number of cases where this requirement was not followed.
- Officers are required by SPD's Foot Pursuit policy to make certain notifications by radio when initiating foot pursuits. Although initiation of the pursuit was justified in all cases reviewed in this audit, notifications required in policy were made in only two of the seven incidents.
- Supervisors are required to complete thorough on scene investigations of level 3-5 use of force, and to take steps to identify and resolve inconsistencies in the evidence. Steps that were not consistently followed in the audited incidents included taking recorded interviews of the subject and witnesses, separating involved officers or admonishing them not to discuss the incident, obtaining third party video, photographing the scene and subject, and identifying and resolving inconsistencies (SA ¶ 41, 57, 59(d), 67.)

### **Next Steps**

The CET has reviewed the results of the audit, as well as specific areas for improvement, with SPD. We believe that the following steps will help move SPD closer to full compliance with the use of force related provisions of the Settlement Agreement:

- Deliver training to supervisors and commanders. SPD used the areas for improvement identified in this audit, and in their own reviews, to help develop the 2025 General Supervisors Training (GST) which is planned for the spring of 2025. Training was reviewed and approved by both the CET and DOJ, but the City has now indicated it is purchasing new less lethal devices which will require updated training. The CET and DOJ will review required edits to the curriculum.
- Development and implementation of FIT training protocol. To achieve full compliance with SA ¶ 62-67, SPD will need to formalize and deliver specialized training to those personnel who will be responsible for investigating the most serious force incidents classified as level 5. Once selected and trained, those personnel will need to respond to these serious incidents and conduct thorough investigations as required by the SA.
- Internal feedback and coaching of supervisors and commanders. In several cases, the UFC has directed feedback and coaching to the uninvolved supervisor and commander who reviewed an incident. The intent of this process is to help move SPD toward compliance by coaching leaders on ways to improve their force investigations and reviews. The Professional Standards Unit (PSU) is also working to implement a similar system to coach reviewing supervisors when the PSU identifies force incidents where significant issues were not adequately addressed or investigations/reviews were insufficient.
- Implement department wide training to address key issues. SPD has done well at addressing issues identified in this audit with supervisors and commanders. Department wide training for officers regarding issues identified above will also be necessary to achieve compliance.

## Audit Methodology and Summary

The CET conducted a thorough review of thirty-two 2024 incidents involving reportable force for this year's audit. Supervisory training based in part on our baseline audit was delivered in the 1<sup>st</sup> quarter of 2024, so force incidents for the 2024 audit were intentionally selected from incidents taking place on or after April 1, 2024, after the 2024 supervisors training was completed. The cases audited included all level 4 and 5 uses of force and a sampling of level 2 and 3 uses of force occurring on or after April 1, 2024, in which the investigation was completed by June 17, 2024. Cases scheduled for review in the two UFC meetings attended by the CET were added to the sample.

SPD classifies reportable force as level 2 through level 5. Level 2 force includes lower-level force such as that which would cause temporary pain or discomfort but not injury, the pointing of a firearm or Taser, or the cycling of a Taser as a warning. Level 3 force is an intermediate level which is likely to cause an injury but does not rise to a higher level. Level 4 includes more serious uses of force such as a Taser, strikes or kicks, and less lethal munitions. Level 5 includes the most serious force such as deadly force, more than two Taser cycles, and strikes to particularly vulnerable parts of the body.

The CET created a survey tool and commenced review of SPD use of force cases to determine if officers and supervisors were complying with SPD policies and the SA. The CET captured both quantitative and qualitative data during the reviews.

In the thirty-two incidents reviewed, there were six cases in which some or all the force used was not consistent with policy. There was one additional case where a determination of whether the force was consistent with policy could not be made. Of great significance in SPD's progress toward internal accountability is the fact that SPD supervisors identified and documented force inconsistent with policy in four of the reviewed cases.

The SPD has consistently noted that force is used very infrequently when measured against the number of calls officers respond to. According to SPD data, officers responded to 141,598 calls for service in 2024. A total of 329 use of force events took place during 321 different calls for service. 234 of these cases involved level 2 force, 69 were level 3 cases, and 21 were level 4. There were five level 5 cases.

While it is important for the community to have this context, it is also important for officers to understand that one improper use of force can be devastating for them personally, the SPD, and the community. It is imperative, particularly for supervisors, to consider potential consequences when reviewing each use of force. Effective supervision, counselling, remedial action, and discipline when appropriate will enhance performance and reduce the likelihood of more serious consequences.

As noted above, we find that SPD has made tremendous progress in 2024 by addressing approximately two thirds of the Settlement Agreement provisions directly related to Use of Force (these requirements are contained in paragraphs 19 through 76 of the SA.) This progress is a testament to the leadership provided by Superintendent Akers and the members of the Professional Standards Unit, and the adoption of these new standards by members and supervisors throughout SPD. We are hopeful that SPD will complete the next steps listed above, address the Use of Force areas for improvement, and continue their progress toward full compliance. We appreciate the close working relationship SPD has established with the CET, DOJ, and community stakeholders, and believe the progress found in this audit is a direct result of collaboration and the SPD's commitment to continual improvement.

## Requirements in Progress

The parties are committed to achieving the remaining requirements of the Settlement Agreement during Calendar Year 2025. At the same time, the parties and the CET have consistently emphasized that this is not a “box ticking exercise.” There is collective commitment to getting it right and realizing the true spirit of the Agreement between the City and DOJ. The CET will continue to assess compliance and report findings to the Court.

There will be particular focus on the following categories during the next reporting period:

- **BOARD OF POLICE COMMISSIONERS TRAINING** - As noted above, several requirements related to the BOPC have been met, including some recurring training sessions. However, ongoing training will be essential to further educate existing and new board members. For instance, DOJ and CET recently approved a training session that addressed preventing bias in decision making.
- **BOARD OF POLICE COMMISSIONERS OVERSIGHT AND IMPROVEMENT REPORT** - This report will be completed within six months after all other BOPC requirements have been met and evaluated.
- **UOF AND IIU AUDITS** – The 2023 and 2024 UOF audits have been completed, as well as the 2023 IIU Audit. The 2024 IIU audit is still underway. these audits will continue for the duration of this process. They produce quantitative and qualitative data to inform compliance determinations.
- **IIU TRAINING** - IIU has received some training provided by an external instructor, but ongoing training will be essential for existing and future IIU investigators. In addition to sound policy and legal knowledge, IIU personnel must be highly trained and skilled investigators.
- **USE OF FORCE SUPERVISORY TRAINING** - This has been delayed due to the acquisition of new less lethal equipment and related software. Training will commence following delivery of new product to familiarize supervisors with these changes.
- **FORCE REVIEW TRAINING COMMITTEE** - This committee will conduct force training needs assessments. SPD has selected candidates and forwarded details to DOJ for consideration. This requirement has been moved to Q2 of 2025.
- **DISCIPLINARY MATRICES** - This requirement requires discussion with the two police unions. Language has been agreed with the supervisors’ union. Agreement must also be reached with the patrol officers’ union.
- **BODY WORN CAMERA POLICY** - An existing policy remains in place, but an updated policy to align with the Settlement Agreement has been drafted and will be presented to the two unions.
- **EARLY INTERVENTION TRAINING** - This requirement will be incorporated into the broader supervisory training to wrap up in Q2 2025.

- **FORCE INVESTIGATION TRAINED (“FIT”) SUPERVISORS** – SPD must identify and deliver training to supervisors who will be assigned to investigate Level 5 uses of force.

## Conclusion

Next month will mark the third anniversary of the Settlement Agreement between DOJ and the City of Springfield. The Compliance Evaluator Team commenced its work in August of 2022. As indicated above, significant progress has been made and collaborative efforts are underway to address outstanding issues. The CET will continue to assess use of force and IIU cases to measure ongoing progress and compliance with the Settlement Agreement.

The CET has consistently underscored the importance of effective supervision and robust training. Both are essential elements to professional and constitutional policing and are also required to attain full effective compliance with this Settlement Agreement. As noted previously, the CET has observed significant improvement in these categories but will continue to monitor both closely.

When conducting compliance assessments during this next reporting period, the following will be areas of particular interest to the CET:

1. Legal and tactical training for the FIU,
2. Additional training for IIU investigators,
3. Ongoing training for the Board of Police Commissioners, and
4. Supervision and management of the FIU.

## Current Work Plan

The table below provides the status of implementation requirements as of publication of this report.

SA Para	Area/Sub	Milestone	RS	Deliverable	Status
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – General Policy	CET	Preliminary Approval or Disapproval of Use of Force – General Policy	
175, 176	<b>Force Policy</b>	SPD will post the Use of Force – General policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Force Policies for Public Comment	
175, 176	<b>Force Policy</b>	SPD will consider whether any further revisions to the Use of Force - General policy are appropriate in light of public feedback received and revise the policy accordingly.	SPD	Consideration of Public Comments Regarding Force Policies	
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Foot Pursuit Policy.	CET	Preliminary Approval or Disapproval of Use of Force – Foot Pursuits Policy.	
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Vehicle Pursuits Policy.	CET	Preliminary Approval or Disapproval of Use of Force – Vehicle Pursuits Policy.	
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Investigation and Review Policy.	CET	Preliminary Approval or Disapproval of Use of Force - Investigation and Review Policy.	
19-61	<b>Force Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD Use of Force – Reporting Policy.	CET	Preliminary Approval or Disapproval of Use of Force – Reporting Policy.	
175, 176	<b>Force Policy</b>	SPD will post the Use of Force – Foot Pursuit, Vehicle Pursuits, Investigation and Review, and Reporting policies on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Force Policies for Public Comment	

175, 176	<b>Force Policy</b>	SPD will consider whether any further revisions to the force policies are appropriate in light of public feedback received and revise its policies accordingly.	SPD	Consideration of Public Comments Regarding Force Policies	
	<b>Force Policy</b>	The Compliance Evaluator will provide final approval of the Use of Force policies.	CET	Final Approval or Disapproval of Force Policies	
170	<b>Body Worn Cameras Protocol</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Body Worn Camera protocol.	CET	Preliminary Approval or Disapproval of Body Worn Camera Protocol	
175, 176	<b>Body Worn Cameras Protocol</b>	SPD will post the Body Worn Camera protocol on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Body Worn Camera Protocol for Public Comment – Pending collective bargaining	
175, 176	<b>Body Worn Cameras Protocol</b>	SPD will consider whether any further revisions to the Body Worn Camera protocol are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding Body Worn Camera Protocol – Pending collective bargaining	
	<b>Body Worn Cameras Protocol</b>	The Compliance Evaluator will provide final approval of the Body Worn Camera protocol.	CET	Final Approval or Disapproval of Body Worn Camera Protocol – Pending collective bargaining	
136	<b>Force Analysis</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the Use of Force (UOF) Data Collection and Analysis protocol.	CET	Final Approval or Disapproval of the UOF Data Analysis Protocol	
141	<b>Training (Field) Policy</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Field Training and Evaluation Program (FTEP) policy.	CET	Preliminary Approval or Disapproval of FTEP Policy	
175, 176	<b>Training (Field) Policy</b>	SPD will post the FTEP policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of FTEP Policy for Public Comment	
175, 176	<b>Training (Field) Policy</b>	SPD will consider whether any further revisions to the FTEP policy are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding FTEP	
175, 176	<b>Training (Field) Policy</b>	The Compliance Evaluator will provide final approval of the FTEP policy.	CET	Final Approval or Disapproval of FTEP Policy	
86	<b>Accountability (IIU)</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator	CET	Preliminary Approval or Disapproval of IIU Policies	



		will review and preliminarily approve SPD's Internal Investigations (IIU) policies.			
175, 176	<b>Accountability (IIU)</b>	SPD will post the IIU policies on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of IIU Policies for Public Comment  Extended review period through 3/31/2024	
175, 176	<b>Accountability (IIU)</b>	SPD will consider whether any further revisions to the IIU policies are appropriate in light of public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding IIU Policies	
175, 176	<b>Accountability (IIU)</b>	The Compliance Evaluator will provide final approval of the IIU policies.	CET	Final Approval or Disapproval of IIU Policies	
86	<b>Accountability (IIU)</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the IIU policies.	CET	Final Approval or Disapproval of IIU Policies Curricula. Note: Ongoing training will be required and will be reviewed by DOJ and CET.	
86	<b>Accountability (IIU)</b>	Using the approved training curricula, SPD will deliver training on the IIU policies.	SPD	Delivery of IIU Policies Training. Note: Ongoing training will be required and will be reviewed by DOJ and CET.	
19	<b>Force Training Approval</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the force policies.	CE	Final Approval or Disapproval of Force Training Curricula	
19	<b>Force Training Delivery</b>	Using the approved training curricula, SPD will deliver Use of Force training to relevant personnel.	SPD	Delivery of Use of Force Training	
196	<b>Force Assessment</b>	The Compliance Evaluator will provide SPD and DOJ with a report detailing its method for conducting the Force Assessment.	CE	Survey tool agreed with DOJ.	
170	<b>Body Worn Cameras Protocol Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the Body Worn Camera protocol.	CE	Final Approval or Disapproval of Body Worn Camera Curricula	
170	<b>Body Worn Cameras Protocol Training</b>	Using the approved training curricula, SPD will deliver training on the Body Worn Camera protocol to relevant personnel.	SPD	Delivery of Body Worn Camera Training – Pending collective bargaining	
141, 142	<b>Field Training Approval</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final	CE	FTEP MPTC Training Curricula approved	

		approval of the training curricula for the FTEP policy.			
142	<b>Field Training Delivery</b>	Using the approved training curricula, SPD will deliver training on the FTEP policy to relevant personnel.	SPD	Thirty-two hour training program was completed by all selected officers and supervisors	
116	<b>Accountability BPC</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of the process for serving on the Board of Police Commissioners (BPC) and the posting of BPC terms and open vacancies on the City's website.	CE	Final Approval or Disapproval of BPC Application Process	
207	<b>Public Engagement</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's community engagement plan.	CE	Plan completed by parties and approved by CET	
209	<b>Public Engagement</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's community outreach and public information program.	CE	Final Approval or Disapproval of SPD Community Outreach and Public Information Program	
129	<b>Accountability Disciplinary Matrix</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Disciplinary Matrix.	CE	Preliminary Approval or Disapproval of Disciplinary Matrix – Delayed due to collective bargaining	
175, 176	<b>Accountability Disciplinary Matrix</b>	SPD will post the Disciplinary Matrix on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Disciplinary Matrix for Public Comment – Delayed due to collective bargaining	
175, 176	<b>Accountability Disciplinary Matrix</b>	SPD will consider whether any further revisions to the Disciplinary Matrix are appropriate considering public feedback received and revise its policy accordingly.	SPD	Consideration of Public Comments Regarding Disciplinary Matrix – Delayed due to collective bargaining	
	<b>Accountability Disciplinary Matrix</b>	The Compliance Evaluator will provide final approval of the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix – Delayed due to collective bargaining	
129	<b>Accountability Disciplinary Matrix</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the Disciplinary Matrix.	CE	Final Approval or Disapproval of Disciplinary Matrix Curricula – Delayed due to collective bargaining	
129	<b>Accountability Disciplinary Matrix</b>	Using the approved training curricula, SPD will deliver training on the Disciplinary Matrix to relevant personnel.	SPD	Delivery of Disciplinary Matrix Training – Pending collective bargaining	

118	<b>Accountability BPC</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will provide final approval of the BPC Manual.	CE	Final Approval or Disapproval of BPC Manual	
87	<b>Accountability IIU</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve SPD's Internal Investigations (IIU) Manual.	CE	Preliminary Approval or Disapproval of IIU Manual	
175, 176	<b>Accountability IIU</b>	SPD will post the IIU Manual on its website for a two-week public comment period and provide opportunities for the public to comment on the manual.	SPD	Posting of IIU Manual for Public Comment	
175, 176	<b>Accountability IIU</b>	SPD will consider whether any further revisions to the IIU Manual are appropriate considering public feedback received and revise its manual accordingly.	SPD	Consideration of Public Comments Regarding IIU Manual	
175, 176	<b>Accountability IIU</b>	The Compliance Evaluator will provide final approval of the IIU Manual.	CE	Final Approval or Disapproval of IIU Manual	
119	<b>Accountability BPC</b>	Upon receiving the agreed-upon drafts from the City and DOJ, the Compliance Evaluator will review and preliminarily approve the training curricula for BPC.	CE	Preliminary Approval or Disapproval of BPC Training  This is a continuous process.	
175, 176	<b>Accountability BPC</b>	The City will post the BPC training on its website for a two-week public comment period and provide opportunities for the public to comment on the training.	City	Posting of BPC Training for Public Comment. Note: BPC training will be ongoing	
69	<b>Force Committee</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Use of Force Committee (UFC) policy.	CE	Completed Q4 2024	
175, 176	<b>Force Committee</b>	SPD will post the UFC policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Completed Q4 2024	
175, 176	<b>Force Committee</b>	SPD will consider whether any further revisions to the UFC policy are appropriate considering public feedback received and revise its policy accordingly.	SPD	Completed Q4 2024	
	<b>Force Committee</b>	The Compliance Evaluator will provide final approval of the UFC policy.	CE	Completed Q4 2024	
64	<b>Force FIT Manual</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's Force Investigations Team (FIT) Manual.	CE	Completed Q4 2024	
175, 176	<b>Force FIT Manual</b>	SPD will post the FIT Manual on its website for a two-week public comment period and	SPD	Completed Q4 2024	

		provide opportunities for the public to comment on the manual.			
175, 176	<b>Force FIT Manual</b>	SPD will consider whether any further revisions to the FIT Manual are appropriate considering public feedback received and revise the manual accordingly.	SPD	Completed Q4 2024	
	<b>Force FIT Manual</b>	The Compliance Evaluator will provide final approval of the FIT Manual.	CE	Completed Q4 2024.	
122	<b>Accountability BPC</b>	SPD will post a quarterly summary of BPC meetings and hearings on the City's website.	SPD	Posting of BPC quarterly summary	
175, 176	<b>Accountability BPC</b>	The City will consider whether any further revisions to the BPC training are appropriate considering public feedback received and revise its training accordingly.	City	Consideration of Public Comments Regarding BPC Training  Note: City Solicitor's Office continues to respond to feedback by developing internal and external training opportunities.	
	<b>Accountability BPC</b>	The City will provide details of all proposed BPC Training in advance.	CE	Note: City Solicitor's Office has been providing advance details.	
119	<b>Accountability BPC</b>	The City will deliver BPC training to relevant personnel.	City	Training is being delivered by City Solicitor's Office and external parties.	
71	<b>Force Committee</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the UFC policy.	CE	Training approved - Q4 2024	
71	<b>Force Committee</b>	Using the approved training curricula, SPD will deliver training on the UFC policy to relevant personnel.	SPD	Training delivered – Q4 2024	
64	<b>Force FIT Manual</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the FIT Manual.	CE	Pending final approval of FIT training	
64	<b>Force FIT Manual</b>	Using the approved training curricula, SPD will deliver training on the FIT Manual to relevant personnel.	SPD	Pending delivery and approval of FIT training	
148	<b>Training Electronic Tracking System</b>	Upon receiving notice that SPD and DOJ have collaborated on the system and agree, the Compliance Evaluator will provide final approval of SPD's electronic tracking system for training.	CE	Final Approval or Disapproval of Electronic Tracking System	
167	<b>Supervision Promotions</b>	Upon receiving the agreed-upon drafts from SPD and DOJ, the Compliance Evaluator will review and preliminarily approve the SPD's promotions policy.	CE	Preliminary Approval or Disapproval of Promotions Policy	

175, 176	<b>Supervision Promotions</b>	SPD will post the promotion policy on its website for a two-week public comment period and provide opportunities for the public to comment on the policies.	SPD	Posting of Promotions Policy for Public Comment  Note: As this policy directly reflects MA law, public comment was not elicited.	
175, 176	<b>Supervision Promotions</b>	SPD will consider whether any further revisions to the promotions policies are appropriate considering public feedback received and revise its policies accordingly.	SPD	As this policy directly reflects MA law, public comment was not elicited.	
	<b>Supervision Promotions</b>	The Compliance Evaluator will provide final approval of the promotions and assignments policies.	CE	Final Approval or Disapproval of Promotions Policy	
167	<b>Supervision Promotions</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the training curricula for the promotions policy.	CE	Final Approval or Disapproval of Promotions Curricula	
169	<b>Supervision Officer Assistance</b>	Upon receiving the agreed-upon draft from SPD and DOJ, the Compliance Evaluator will provide final approval of SPD's officer wellness program.	CE	Final Approval or Disapproval of Officer Wellness Program	
169	<b>Supervision Officer Assistance</b>	SPD will implement the approved officer wellness program.	SPD	Implementation of Approved Officer Wellness Program	
152	<b>Supervisor General Training</b>	Upon receiving the agreed-upon draft training curricula from SPD and DOJ, the Compliance Evaluator will provide final approval of the general supervisor training curricula.	CE	Final Approval or Disapproval of General Supervisor Training Curricula – Note: 2025 training understandably delayed while SPD transitions to new Axon equipment.	
152	<b>Supervisor General Training</b>	Using the approved training curricula, SPD will deliver training on the general supervisor training to relevant personnel.	SPD	Delivery of General Supervisor Training	
124	<b>Accountability Annual Report – Complaints and Discipline</b>	SPD will publish an annual report that summarizes, at minimum, complaint trends, disposition of complaints, the Board of Police Commissioners' discipline decisions, and its public outreach functions.	SPD	Final Approval or Disapproval of Annual Report	
196	<b>UOF and IIU audit</b>	CET conducts ongoing audits of 1) UOF cases, and 2) IIU investigations.	CE	To be completed every six months by CET. First round completed. Current audits ongoing.	
122	<b>BPC Quarterly Summaries</b>	Summaries posted to City website.	City	Posted quarterly	
123	<b>BPC Annual Meetings</b>	Public meeting to provide overview of BPC work.	City	To occur annually	

209	<b>SPD - Hosted Quarterly Meeting</b>	SPD collaborates with community organizations on these meetings.	SPD	To occur quarterly	
212	<b>Public Engagement</b>	SPD to design community survey.	SPD	Parties currently working on design. Pending delivery of new community feedback tool	
146, 147	<b>Force Training Review</b>	Create Force Review Training Committee that will conduct Force Training needs assessment.	SPD	Selections have been forwarded to DOJ. Review criteria must be agreed	
125	<b>Accountability BPC</b>	BPC Oversight and Improvement Report	SPD	Anticipated completion by end 2025	
164	<b>EIS Training</b>	To be covered in Use of Force Supervisory Training	SPD	Training currently underway. Will be completed Q2 2025	

## APPENDIX A

### Compliance Evaluator Team

Members of the CET welcome opportunities to engage with representatives of the parties and the Springfield community. For those we have not met in person or during virtual community meetings, the biographies below should provide an overview of our diverse experience in modern policing.



#### Kathleen M. O'Toole | Lead Compliance Evaluator

O'Toole is a lawyer and career police officer who has earned an international reputation for her principled leadership and reform efforts. She currently serves as president of O'Toole Associates, LLC and as a partner at 21st Century Policing Solutions.

In 2018, O'Toole completed her service as Chief of Police in Seattle, Washington where she led the Seattle Police Department through a major transformation project. In addition to addressing the requirements of a settlement agreement between the US Department of Justice and the City, she introduced leading-edge business practices and operational strategies that reduced crime and enhanced community trust.

O'Toole also chaired the Commission on the Future of Policing in Ireland. In September 2018, the Commission presented its findings and recommendations for sweeping reforms to An Garda Síochána, the Irish national police service. She had previously served a six-year term as Chief Inspector of the Garda Síochána Inspectorate, an oversight body responsible for advising the Irish Minister of Justice and recommending best practices for policing and security.

Earlier in her career, O'Toole rose through the ranks of local and state policing in Massachusetts. She began her career as a beat cop in the Boston Police Department and was assigned to numerous patrol, investigative, undercover, supervisory and management positions. She served as Superintendent (Chief) of the Metropolitan District Commission Police and Lieutenant Colonel overseeing Special Operations in the Massachusetts State Police. She was later appointed Massachusetts Secretary of Public Safety and Boston Police Commissioner.

O'Toole has worked on other high-profile reform projects. In 1998-1999, she was a member of the Independent Commission on Policing in Northern Ireland (The Patten Commission). The Commission published recommendations that transformed policing there as part of the Peace Process. In 2009, she served on a four-person panel that created the blueprint for reforming the Northern Ireland Prison Service. She was a member of the Independent Commission on Policing in England and Wales that published findings in late 2013. She also served as Joint Compliance Expert overseeing an agreement between the US Department of Justice and the Town of East Haven, CT to ensure constitutional policing. She continues to serve as a consultant to several federal, state and local government agencies.

O'Toole earned a BA from Boston College, JD from New England School of Law, and PhD from the Business School of Trinity College Dublin. She is a life member and served on the board of directors of the International Association of Chiefs of Police. She also served as a board member and treasurer of the Police Executive Research Forum.





### Rodney D. Monroe | Compliance Evaluator

Retired Chief Rodney Monroe is an accomplished and highly respected subject matter expert in community policing and police reform. With over 40 years of experience in law enforcement, retiring as Assistant Chief of Police in Washington, D.C., and continuing to serve as Chief of Police for 15 years in three cities, he is now sharing valuable knowledge and expertise with various law enforcement entities.

Under his leadership as Chief of Police in Charlotte, NC, Richmond, VA, and Macon, GA, historical reductions in violent crime were reached. These departments also experienced a significant increase in police and community relationships through the development and implementation of innovative programs and engagements.

Chief Monroe continues his police reform efforts by partnering with noted professional organizations providing consulting services and subject matter expertise in collaborative reform projects, critical incident reviews, violence reduction projects, body worn camera programs, and the handling of mass demonstrations and special events.

He served as Monitor for Department of Justice Federal Consent Decree in Meridian, MS. He currently serves as the Deputy Monitor for the Chicago Police Department's Consent Decree. His focus areas include, Use of Force, Accountability/Transparency, Supervision, Training, Officer Wellness and Safety, and Hiring, Recruitment, and Promotion.

Chief Monroe has served as an Expert for the USDOJ Civil Rights Division in conducting Pattern and Practices investigations in the Louisville Metro Police Department, the Memphis Police Department, the Louisiana State Police, and the Mt. Vernon Police Department.

Additionally, Chief Monroe has provided subject matter expertise on several other projects, including conducting a Racial Bias Audit for the City of Charleston, SC; North Charleston Collaborative Reform; and Minneapolis Critical Incident Review. Chief Monroe served as a Strategic Site Liaison for the Department of Justice, Bureau of Justice Assistance National Public Safety Partnership (PSP), National Body Worn Camera Program, and Safer Neighborhoods through Precision Policing Initiative (SNPPI) TTA programs.



### Natalia M. Delgado | Compliance Evaluator

Attorney Natalia Delgado left private practice in 2009 to begin her career in government, serving as Associate General Counsel with the Office of Illinois Governor Pat Quinn. Delgado had principal responsibility for addressing the legal issues of several State boards and agencies, including the Illinois State Police, Prisoner Review Board, and the Department of Corrections. In addition, Delgado managed Executive Clemency, leading a team reviewing petitions and making recommendations to the Governor, ultimately acting on nearly 5,000

petitions.

Delgado went on to serve as Deputy General Counsel and Chief of Litigation for the Illinois State Police. Her responsibilities included managing the litigation pending against the Department and its officers,

prosecuting officers administratively for alleged policy violations, making policy recommendations, drafting proposed legislation, and testifying before the legislature. Delgado also created curriculum and provided training to sworn officers and forensic scientists on various topics including Civil Rights & Civil Liabilities, Responsibilities of Field Training Officers, Search & Seizure, Bias Based Policing and Civil Deposition Preparation. While there, Delgado received a Meritorious Service Medal, awarded for outstanding achievements contributing to the efficiency and effectiveness of the Department.

Delgado next served as Deputy Director of Policy at the Cook County State's Attorney's Office, where she coordinated the planning, development and execution of several new policy and research efforts. Delgado leveraged relationships with law enforcement partners and advocates to educate and train on new initiatives and developed multidisciplinary teams to coordinate investigations and support services.

Delgado went on to serve as City Prosecutor in the City of Chicago, managing the attorneys and department responsible for prosecuting criminal and administrative violations of the Chicago Municipal Code. Delgado's practice also included civil defense of Freedom of Information Act litigation pending against City Departments in circuit court.

Delgado currently serves as General Counsel for the Illinois Commerce Commission, the state agency responsible for overseeing electric, natural gas, telecommunications, water and sewer public utility companies in the state. The Commission employs close to 300 people and operates with an annual budget of approximately 65 million dollars.

Delgado received a Bachelor of Arts Degree from Colgate University and a Juris Doctor from DePaul University School of Law. She is bilingual in Spanish and English.



#### Michael Teeter | Compliance Evaluator

Mike Teeter is an educator and career police officer who serves as a police practices expert providing training, consulting, and expert witness services related to leadership, use of force, policy, significant incidents, accountability, human resources, and training. He uses the extensive experience garnered leading force investigations, training, policy development, human resources, and force review boards for the Seattle Police Department during Seattle's reform journey to help other organizations improve and reform their processes, practices, training, and leadership development. The overall goal of Teeter's work is to improve public trust and confidence in law enforcement through meaningful reform, timely and relevant training, solid supervision and effective accountability systems and measures including thorough, objective, and transparent investigations of police actions. In addition to building community trust and confidence, this work is intended to improve professionalism, wellness, and officer safety and ultimately, to reduce force related injuries and deaths recognizing the sanctity of human life.

Teeter rose through the ranks of the Seattle Police Department where he served for nearly 30 years before retiring in 2022 as a Captain. He has a broad range of experience which has prepared him to serve others as a consultant and expert, and to teach current and aspiring criminal justice professionals. In addition to the assignments noted above, Teeter commanded the Seattle Police West Precinct, leading a team of 200 sworn officers providing front line police services to a daytime population exceeding 260,000 in the heart of Seattle's downtown and tourist core. Other roles he's held in his career include impaired driving

enforcement, drug recognition expert (DRE), field training officer (FTO), internal investigations sergeant and lieutenant, patrol sergeant and shift commander, and recruiting/background investigation lieutenant.

Teeter is now serving as the Graduate Program Director for Salve Regina University's online criminal justice and cybersecurity program. He teaches graduate level criminal justice courses, advises students and is responsible for the overall content and quality of this very popular degree program.

In addition to his work at Salve Regina, Teeter's current consulting work includes serving as an expert regarding police use of force incidents and internal investigations, serving on the Springfield, MA Compliance Evaluator Team, and conducting leadership training for Washington State police leaders.

Teeter earned two Bachelor of Science Degrees from the University of Washington and a Master of Science Degree from the University of Southern California.

## APPENDIX B

### The Settlement Agreement

The following is a synopsis of the process that led to the Settlement Agreement and this ongoing process:

On Wednesday, April 13, 2022, the United States Department of Justice Civil Rights Division (“DOJ”) and the United States Attorney’s Office for the District of Massachusetts (“USAO”) filed in U.S. District Court a complaint and proposed consent decree (“Settlement Agreement” or “Agreement”) with the City of Springfield, MA (City). This action was the culmination of an investigation, originally launched in April 2018, that concluded the Springfield Police Department’s (“SPD”) Narcotics Bureau engaged in a pattern or practice of excessive force that deprived individuals of their rights under the Fourth Amendment to the U.S. Constitution.

The DOJ investigation and subsequent Settlement Agreement focus primarily on the use of excessive force. The comprehensive, sixty-nine-page agreement outlines desired reforms that will improve policies, training and accountability related to SPD officers’ use of force. As stated in the press release issued by the Department of Justice on the day of the filing:

“The improvements will ensure that officers avoid force whenever possible through the use of de-escalation tactics; that officers know when force can and cannot be used; and that officers report all instances where force is used. In addition, the Springfield Police Department will provide better supervision of officers and improve internal investigations of complaints of officer misconduct. When officers violate use-of-force policies, the agreement will ensure that the Springfield Police Department holds officers accountable.”

The Agreement required the parties to recommend a monitor, known as “Compliance Evaluator,” to be appointed by the federal judge overseeing the Agreement, Magistrate Judge Katherine A. Robertson, U.S. District Court, District of Massachusetts. Following a rigorous and competitive process, O’Toole Associates, LLC was ultimately selected for the role and appointed by Judge Robertson on August 1, 2022. Kathleen O’Toole, the company’s founder and president, serves as lead compliance evaluator, assisted by Rodney Monroe, Natalia Delgado, and Michael Teeter who serve as deputy compliance evaluators. Collectively, this group is now referred to as the Compliance Evaluator Team (“CET”).

As the objective representative of the Court, the CET is required to assess and report whether the requirements of the Agreement have been met and if implementation is producing the desired result - constitutional and effective policing. The CET also works with the parties to identify any barriers to compliance and provides technical assistance to SPD to overcome such barriers.

As required in Paragraph 194 of the Agreement, prior to the appointment of the CET, DOJ and the City agreed on a detailed outline of key benchmarks for implementation of the Agreement.

Under Paragraph 196 of the Agreement, the CET is also required to conduct a review every six months to determine if the city and the SPD have met the requirements of the Agreement. In doing so, the CET considers policies that have been developed and implemented, training in

support of those policies, and measures to ensure the SPD is consistently following and holding its personnel to the requirements of the Settlement Agreement. The review processes include both quantitative and qualitative assessments.