



**Compliance Report**  
**July 14, 2014**

## Introduction

This report issues pursuant to Sections III(b)(vii); IV (c)(ii); and IX(c)(ii) of the Agreement between the United States Department of Justice (United States) and the Suffolk County Police Department (Department).

The report is arranged in the sequence of the Agreement, and lists each requirement along with its corresponding compliance measure. All references are provided as separate attachments.

# SECTION III

## Bias-free Policing

## **Section III(a)**

### Requirements

This section of the Agreement recognizes the Department's commitment to deliver police services that are equitable, respectful, and free of unlawful bias, in a manner that promotes broad community engagement and confidence in the Department. It also requires the Department to ensure that members of the public receive equal protection of the law, without bias based on race, color, ethnicity, national origin, religion, or sexual orientation, and in accordance with the rights, privileges, and immunities secured or protected by the Constitution and laws of the United States.

### Compliance Measures

Rules and Procedures ("R & P") Chapter 1, Section 1(II)(A)-(D)(1) has been amended to restate the mission of the Department in a manner that incorporates all the principles set out above.

By incorporating the verbiage of the Agreement into the Rules and Procedures, and thereby conforming Departmental policy to the mandates of the Agreement, the Department has achieved Substantial Compliance with this section.

ATTACHMENT 1 – R & P Ch.1, §1

## **Sections III(b)(i) and (ii)**

### Requirements

This portion of the Agreement requires the Department to maintain a comprehensive policy prohibiting discrimination, including the denial of services, on the basis of race, color, ethnicity, national origin, religion, or sexual orientation in police practices. It also mandates that the Department's policy on bias-free policing will prohibit officers from using race, color, ethnicity, national origin, religion, or sexual orientation in conducting stops or detentions, or activities following stops or detentions, except when engaging in appropriate suspect-specific activity to identify a particular person or persons.

### Compliance Measures

Chapter 1, Section 1 of the Rules and Procedures has been amended to define illegal profiling [Ch. 1, §1(III)(A)] and biased policing [Ch. 1, §1(III)(B)] as defined in the Agreement. Both practices are, in turn, prohibited by R&P Ch. 1, §1(V)(A) and (B) respectively.

By incorporating the verbiage of the Agreement into the Rules and Procedures, and thereby conforming Departmental policy to the mandates of the Agreement, the Department has achieved Substantial Compliance.

ATTACHMENT 2 – R & P Ch. 1, §1

## **Section III(b)(iii)**


### Requirements

This section of the Agreement requires that within five days of receipt, the Department will refer any complaint of discriminatory policing to IAB for a full investigation. It also requires the Department to send a copy of any such complaint and material documenting the resulting investigation to the United States within five business days upon completion of the investigation.

### Compliance Measures

Chapter 5, Section 2 of the Rules and Procedures has been amended to require that all complaints of biased-policing be referred to IAB within 48 hours of receipt. (R & P Ch. 5, §2(VI)(C)). Additionally, Department Memorandum 14-76 echoes this requirement and provides further practical guidance for supervisors handling and referring biased-policing complaints.

The referral of complaints to the IAB is automated by the “IPro” software platform. Pursuant to the cited Rules and Procedures, supervisors in the field are mandated to enter all complaints into the IPro database via the “Blue Team” portal which is resident on the Department’s intranet homepage. All Blue Team entries are then reviewed by the IAB command staff within 48 hours, and pursuant to Ch. 5, §2(VI)(I) complaints of profiling, biased policing or discriminatory policing are assigned to an investigator within IAB.



Adoption of this requirement into Departmental policy and command procedure constitutes Substantial Compliance.

ATTACHMENT 3 – R & P Ch. 5, §2

ATTACHMENT 4 – Department Memorandum 14-76

## **Section III(b)(iv)**

### Requirements

This portion of the Agreement requires that officers who are found to have engaged in discriminatory policing will be subjected to disciplinary action and, where appropriate, will be referred for possible criminal prosecution.

### Compliance Measures



## **Section III(b)(v)**

### Requirements

This portion of the Agreement requires the Department to maintain a policy that promotes bias-free policing and equal protection within its hiring, promotion, and performance assessment processes. It also mandates that officers who have a history of engaging in biased policing practices will not be entitled to promotional opportunities, except as required by collective bargaining laws and Civil Service Laws, rules and regulations.

### Compliance Measures

Chapter 17, Section 2 of the Rules and Procedures has been amended to include a pre-promotional review of members' documented histories of biased-free policing.. (Ch. 17, §2(III)(C)).

Prior to the execution of this Agreement, "Biased Policing" was not a recognized category of misconduct within the IAPro system. A category for "Discrimination" existed, but was largely utilized in the context of complaints made by employees. Misconduct that is now defined as Biased or Discriminatory Policing was previously captured as "Civil Rights Violation",

“Negative Personal Contact”, “Bias Incident”, or “Unprofessional Language/Conduct”. The amendment to Rules and Procedures Chapter 1, §1 (V) which prohibits biased and discriminatory policing along with the inclusion of a Biased Policing category in IAPro now makes it possible to identify officer misconduct fitting these definitions and thereby restrict promotional opportunities in accordance with this Agreement.

The adoption of the required policy and the amendment of misconduct allegations to conform therewith constitutes Substantial Compliance with this section.

ATTACHMENT 5 – Rules and Procedures Chapter 17, §2

## **Section III(b)(vi)**

### Requirement

This section requires the Department implement a revised Chapter 16, Section 4, “Arrest of Non-US Citizens and Persons with Dual Citizenship,” as previously approved by the United States.

### Compliance Measures

Rules & Procedures Chapter 16, §4 has been revised as previously approved by the United States and reissued in its entirety and thus, Substantial Compliance with this section has been achieved.

Going forward, any required amendments to this provision will be sent to the United States for approval.

ATTACHMENT 6 – R & P Ch. 16, §4

## **Section III(b)(vii)**

### Requirement

This section of the Agreement requires the Department to provide to the United States a report showing civilian complaints regarding police services related to allegations of discrimination and biased policing, noting the disposition of each complaint, if any, the geographic area in which the alleged discrimination occurred, the demographic category involved, and what measures, if any, the Department will take as a result of the analysis.

### Compliance Measures

Since the inception of the Agreement, the Department has received a total of six complaints which include allegations of biased or discriminatory policing. None of these cases have been completed.

[REDACTED]

[REDACTED]

Conforming the definition of biased policing to the available categories of misconduct allegations within IAPro, and tracking the data points required by the Agreement constitutes Substantial Compliance with this section.

Based upon the data available at this juncture from the above cited cases, no conclusions may be drawn from the location or demographic. Going forward, as cases are completed and facts more fully developed, a more thorough analysis will be possible.

[REDACTED]

## Section III(c)(i)

### Requirement

This section of the Agreement recognized the implementation of a revised Chapter 13, Section 9, “**Traffic Stop Data Collection**,” as previously approved by the United States

### Compliance Measures

Rules & Procedures Chapter 13, §9 has been revised and approved by the United States, and has been reissued by the Department in its entirety. In addition to amending the content of the T-Stop database, oversight responsibilities were further defined in “Patrol Division Memorandum 14-8” to ensure compliance.

The data pool available for analysis in the next compliance report will span from August 1, 2014 to December 31, 2014. The data captured from 2009 through August 1, 2014 will be retained, although it is incompatible for analysis due to the amended definitions and fields contained in the new Ch. 13, §9.

Implementation of Ch. 13, §9 as approved by the United States and alteration of the software platform to capture the new fields delineated therein constitutes Partial Compliance.

Going forward, the Traffic Stop Data Collection software will be fully installed in all precincts by the end of July 2014, and will beginning populating the new database as of August 1, 2014.



The Research and Development Section will forward a proposed analysis matrix to the United States when it is complete and in advance of the next compliance report.

ATTACHMENT 8 – R & P Ch. 13, §9

ATTACHMENT 9 – Patrol Division Memorandum 14-08

## **Sections III(d)(i) and (ii)**

### Requirement

This portion of the Agreement requires the Department to ensure that all sworn officers receive training on bias-free policing at least annually. This training will emphasize that discriminatory policing, in the form of either selective enforcement or non-enforcement of the law, including the selecting or rejecting of particular policing tactics or strategies, is prohibited by policy and will subject officers to disciplinary action. Specifically, the training curriculum will address:

1. Methods and strategies for more effective policing that relies upon non-discriminatory factors;
2. Police and community perspectives related to discriminatory policing;
3. Constitutional and other legal requirements related to equal protection and unlawful discrimination;
4. The protection of civil rights as a central part of the police mission and as essential to effective policing;
5. The existence and impact of arbitrary classifications, stereotyping, and implicit bias;
6. Identification of key decision points where prohibited discrimination can take effect at both the incident and strategic-planning levels; and
7. Methods, strategies, and techniques to reduce misunderstanding, conflict, and complaints due to perceived bias or discrimination, including problem-oriented policing strategies; and
8. Cultural sensitivity.

### Compliance Measures

In order to comply with this requirement and the training requirements of Section V(g) below, the Department has devised an eight (8) hour training session which will be administered annually to all sworn officers. The curriculum for that session is presently under development. A draft is attached and the full curriculum, including all referenced multi-media, will be provided to the United States immediately upon completion. Training will commence during the first week of September 2014 at the Police Academy, and a schedule of all training sessions will also be provided to the United States immediately upon completion.

The terms of this Agreement call for this training on an annual basis. Since this requirement is not yet due, no level of compliance is indicated.

ATTACHMENT 10 – Draft curriculum materials

# SECTION IV

## Hate Crimes and Hate Incidents

## **Section IV(a)**

### Requirement

This section of the Agreement requires the Department to ensure that all officers receive hate crime and hate incident training at least annually. This training will address:

1. The elements of relevant crimes, including hate crimes and bias crimes; and
2. How to properly charge offenses and avoid the downgrading of crimes, including hate crimes and hate incidents.

### Compliance Measures

The Hate Crimes Unit (“HCU”) previously provided training to members of the Department in the Recruit Training, In-Service Training, Basic Criminal Investigations, Advanced Criminal Investigations, and Police Supervision courses. This curriculum has been condensed and incorporated into the course given by the Police Academy pursuant to this Agreement, and is part of the day-long training session described above in Sections III(d)(i) and (ii).

As noted above, the required frequency for this training is annual, and therefore, no level of compliance is presently indicated.

## **Section IV(b)(i)**

### Requirements

This section of the Agreement requires the Department to implement a policy to track, analyze and report patterns and trends regarding hate crimes and hate incidents.

### Compliance Measures

The Department has created a tracking system which overlays hate crimes onto a computerized map of the County. The link to view this map is:

<https://gisportal.suffolkcountyny.gov/gis/home/index.html>

The policy governing the analysis and tracking of hate crimes and incidents is described in R&P Ch. 24, § 6 (VI)(H). The ongoing analysis conducted pursuant to that R&P section presently reveals no discernable pattern of hate crimes or incidents within the police district.

The tracking and analysis measures implemented in order to identify patterns of hate incidents/crimes constitutes Substantial Compliance with this section.

ATTACHMENT 11 – R & P Ch. 24, §6

## **Section IV(b)(ii)**

### Requirements

Pursuant to this portion of the Agreement, the Department must produce an annual report mapping and analyzing for potential patterns and trends all hate crimes and hate incidents which have occurred over the previous six months. This report will detail the Department's planned response to any identified pattern or trend.

### Compliance Measures

According to the language of the Agreement, the first report required by this section will be due on January 14, 2015. That report will include all hate crimes and hate incidents from January 14, 2014 to approximately December 14, 2014. Since this report is not yet due, no level of compliance is indicated.

## **Section IV(c)(i)**

### Requirement

This section of the Agreement requires the Department to implement a policy describing the quality assurance process that ensures that HCU investigations follow proper techniques and procedures.

### Compliance Measures

Rules and Procedure Chapter 24, Section 6 (Attachment 11) outline investigative operations for hate crimes and hate incidents. Section IV (a) of this chapter provides responding officers with detailed instructions on how to conduct preliminary investigations, and Section IV(d) addresses the specific responsibilities of Hate Crimes Unit investigators. Additionally, a Command General Order details the quality assurance processes already in place.

The implementation of R&P Ch. 24, §6 and reduction of quality control measures to a Command General Order constitute Substantial Compliance.

ATTACHMENT 12 – Command General Order 14-1



# SECTION V

## Language Assistance

## **Section V(a)(i)**

### Requirement

This section of the Agreement requires the Department to maintain a policy which provides for a current Language Access Plan that explains how the Department will implement its policies and procedures to provide meaningful access to police services. The Agreement further requires that such plan be updated at least annually.

### Compliance Measures

The Language Access Plan (LAP) has been previously submitted to, and approved by, the United States. It has been formatted for inclusion in the Rules and Procedures Chapter 26, Section 6 to afford it the full weight of institutional policy. The Department has implemented the procedures detailed in the LAP since that document's inception, with the exception of its interpretation protocols. These protocols have not yet been finalized due to ongoing discussion with the United States regarding the certification process of Department Authorized Interpreters (DAI) and use of bilingual officers. Implementation of the majority of the LAP protocols and drafting its inclusion in the Rules and Procedures constitutes Partial Compliance with this section.

Going forward, the draft R&P Ch. 26, §6 will be issued no later than July 21, 2014. That R&P mirrors the LAP already approved by the United States. Upon approval of DAI certification procedures, R&P Ch. 26, §6 will be amended accordingly and submitted to the United States for approval.

ATTACHMENT 14 – SCPD Language Access Plan

ATTACHMENT 15 – Rules and Procedures Chapter 26, Section 6

## **Section V(a)(ii)**

### Requirement

This section of the Agreement requires the Department to translate the Language Access Plan and policy into Spanish and other non-English languages as appropriate and posting in a public area of the police department building, on its website, and in any other locations throughout the County where individuals go to seek police assistance.

### Compliance Measures

The Language Access Plan (LAP) has been distributed to all members of the Department. It is available in both English and Spanish in the public areas of all Department buildings: Precincts 1-7, Headquarters, Property Section, and Impound Unit.

The LAP is available online in English at:

<http://apps.suffolkcountyny.gov/police/documents/lap.pdf>

and in Spanish at:

[http://apps.suffolkcountyny.gov/police/documents/lap\\_SP.pdf](http://apps.suffolkcountyny.gov/police/documents/lap_SP.pdf)

Translation, distribution and posting of the LAP constitutes Substantial Compliance with the requirements of this section.

ATTACHMENT 16 – SCPD Language Access Plan (Spanish)

## **Section V(a)(iii)**

### Requirement

Distribution of the Language Access Plan and Policy to all SCPD staff and to community organizations serving LEP communities encountered by SCPD.

### Compliance Measures

As described above, the LAP has been disseminated Department-wide and will also be issued as a General Order amending the Rules and Procedures by creating Ch. 26, §6. In addition, the Precinct CLO's, COPE officers and the CRB have distributed the LAP to approximately sixty-five (65) community groups as of this writing. Additionally, to ensure maximum exposure, the LAP has been emailed to all sworn members, Lieutenant and above. These measures constitute Substantial Compliance with this section.



ATTACHMENT 18 – CRB LAP Distribution Chart

## **Section V(a)(iv) and (v)**

### Requirements

These sections require the Department to make Citizen Complaint/Compliment forms available in Spanish and other common non-English languages in all precincts and on SCPD's website for both completion and submission. It also requires that the translation of all vital written documents and materials shall be consistent with DOJ Guidance, in order to ensure that LEP individuals in the community have meaningful access to such documents and materials.



## Compliance Measures

Vital documents and forms available in Spanish are located on the Department website here:

[http://apps.suffolkcountyny.gov/police/information\\_sp.htm](http://apps.suffolkcountyny.gov/police/information_sp.htm)

These documents are also available at the Precincts in hardcopy form on request. The requirement to translate documents received in other languages is contained in the LAP (Attachment 14), and will be memorialized in official policy upon the issuance of R&P Ch. 26, §6 (Attachment 15).

These measures constitute Substantial Compliance.

Review of the need to translate additional documents is conducted by the CRB on an ongoing basis through regular meetings with Precinct CLOs and by reviewing community meeting feedback reports. Documents, vital or otherwise, will continue to be added to the Spanish portion of the Department's website, and the CRB is researching translation services for additional languages.

ATTACHMENT 19 – Compliment Complaint Form PDCS – 1300-1a-SP

ATTACHMENT 20 – Screenshot of Spanish forms online

ATTACHMENT 21 – How to Obtain a Police Report PDCS 8100h

## **Section V(a)(vi)**

### Requirement

This section requires the translation of any citizen correspondence received that is in a non-English language. If that correspondence when translated would be considered a citizen complaint, then the information as translated will be processed in the same manner as are citizen complaints originally received in English.

### Compliance Measures

Any written correspondence received by the Department is translated into English according to the provisions of the LAP [§VI(B)(3); (R&P Ch. 26, §6(VI)(B)(3)]. Once translated into English, both the original and the translation are forwarded to the appropriate command for action. These measures constitute Substantial Compliance.

## **Section V(a)(vii)**

### Requirement

This section requires the availability of bilingual operators for complaint phone lines or a dedicated Spanish complaint phone number. SCPD will indicate on its Spanish-language Compliment/Complaint form that the phone operator speaks Spanish.

### Compliance Measures

Telephone complaints are received only by the Internal Affairs Bureau and Precinct Officers-in-Charge (OIC). OICs in need of language assistance contact the appropriate interpreter pursuant to R & P Ch. 26, §5. The Internal Affairs Bureau has two bilingual investigators:

Lieutenant Milagros Soto  
Sergeant Rafael Cano

In the event neither bilingual IAB investigator is working, and the required language is Spanish, a Spanish Speaking 911 operator (ECO-SP) is utilized on site. Presently, at least 3 ECO-SPs are assigned to each squad in the Communications Section. The required notice is present on the Compliment/Complaint Form (PDCS 1300-1a-SP).

These measures constitute Substantial Compliance with this section's requirements.

ATTACHMENT 22 – Screenshot of Personnel Section report – ECOs Spanish Speaking (SS)

## **Section V(a)(viii)**

### Requirement

This section requires the Department to develop objective oral language proficiency standards and annual proficiency testing for all IAB members who are designated as “Spanish-speaking” or as speaking a non-English language.

### Compliance Measures

The Department is currently discussing the proper certification procedure for Department Authorized Interpreters (DAI) and bilingual officers. Once a process is approved, the bilingual IAB officers will be certified using its protocols.

As no process is yet in place, these measures constitute Non-Compliance.

## **Section V(a)(ix)**

### Requirement

This section requires the recording and periodic auditing of phone calls through the multi-language toll-free complaint hotline.

### Compliance Measures

The Department employs the services of a contract vendor to supply 24 hour telephonic interpretation and translation services, Language Line Solutions. This independent vendor maintains its own quality control measures.

## **Section V(a)(x)**

### Requirement

This section requires the Department to document the use of any interpreter used when conducting a field interview or interrogation of an LEP individual, including the following:

1. the date;
2. the location;
3. the full name of the interpreter;
4. the non-English language spoken by the interpreter;
5. the relationship (if any) of the interpreter to the LEP individual;
6. contact information for the interpreter, including telephone numbers, email and postal address;
7. the name of the witness, victim, and subject person requiring an interpreter to the extent not prohibited by privacy laws; and
8. a summary of any action taken.

### Compliance Measures

The Department has issued an official form, “Interpretation Tracking Form” (PDCS 7042a) to record these data fields and also track the provision of services. Additionally, according to R&P Ch. 26, §5 the fields above are also captured on all statements and confessions obtained through the use of interpretation services. Implementation of these procedures constitutes Substantial Compliance.

Going forward, upon approval of interpreter certification protocols, this form will be amended to include the use of bilingual officers who are not DAIs.

ATTACHMENT 23 – Interpretation Tracking Form (PDCS 7042a)

## **Section V(b)**

### Requirement

This section requires the Department to revise “Language Line Translating and Interpreting Service,” Order Number 09-117, as follows: The order will use the term “interpretation” to refer to oral communication, and “translation” to refer to written communication. As written, the order uses both terms interchangeably.

### Compliance Measures

Order 09-117 has been superseded by Order # 10-58b, which is a Department Memorandum (DMEM) explaining the utilization of Language Line Services. Additionally, a Patrol Division General Order (14-01a) was also issued to update and expand on DMEM 10-58b. Issuance of these orders constitutes Substantial Compliance with this section.

ATTACHMENT 25 – Patrol Division General Order 14-01a

## **Section V(c)**

### Requirement

This section requires the Department to modify its practices and implement the revised Chapter 26, Section 5, “Persons with Limited English Proficiency,” as previously approved by the United States.

### Compliance Measures

Rules and Procedures Ch. 26, §5 was submitted to, and approved by, the United States prior to the execution of this Agreement. The Department presently seeks amendment to this chapter in order to better define the role of bilingual officers in providing interpretation services to individuals with LEP.

In sum, the use of bilingual officers as interpreters is sought for situations in the field which do not require the taking of victim, witness or suspect statements. This protocol would allow for the more efficient provision of interpretation services for routine matters. Bilingual officers would be subject to annual, objective proficiency testing, but would not require certification as DAIs.

The present R&P Ch. 26, §5 provisions, including 911 procedures, interpretation tracking, notification to the public of language services, and the use of Language Line services are all in current use and constitute Partial Compliance.

Upon resolution of interpreter certification protocols and the use of bilingual officers, approval of the amended sections of R&P Ch. 26, §5 by the United States the Department will be in full compliance with this section.

## **Section V(d)**

### Requirement

This section requires the Department to ensure that the home page of its website states, in at least Spanish, how to access language assistance services and Spanish translations of SCPD policies and other relevant information.

### Compliance Measures

As noted above in V(a)(iv) (Attachment 20), a Spanish language button is located on the home page of the Department's internet site which brings users to a page dedicated to vital forms and documents that have been translated into Spanish. These measures constitute Substantial Compliance.

Going forward, the Department will add and update all information on this page to coincide with all English language additions and amendments. The Department will also continue to seek IT solutions that provide translation of site navigation information in multiple languages to broaden the accessibility of our online resources.

## **Section V(e)**

### Requirements

This section requires the Department to maintain effective incentives for bilingual employees to become SCPDAIs, including assignments, promotions, and other means available to the County.

### Compliance Measures

The Department is presently awaiting confirmation from the United States of its proposed method of certifying DAIs. Once certification procedures are in place, a comprehensive plan for incentivizing that designation will be developed and provided to the United States for approval. Because DAIs have not yet been fielded it is not possible to incentivize that designation and therefore no compliance level is indicated.

## **Section V(f)**

### Requirements

This section requires the Department to implement a process of consultation with representatives of the Latino community to develop and annually review: implementation of the Language Access Policy, including areas of possible collaboration to ensure its effectiveness; accuracy and quality of SCPD language assistance services; and concerns, ideas, and strategies for ensuring language access. This process will be reviewed and approved by the United States prior to its implementation.

### Compliance Measures

A report detailing the process of consulting with members of the Latino community was forwarded to the United States on or about April 1, 2014, pursuant to this Agreement. It is attached below for ease of reference. Shortly before the compilation of this semi-annual report, the Department was made aware of several questions posed by the United States in response to the April 1, 2014 report. These questions sought additional information regarding specifics of the Engagement Plan and will be promptly answered under separate cover. Pending submission of that information the Department assigns a level of Partial Compliance to this section.

ATTACHMENT 26 – Internal Correspondence from Report submitted on April 1, 2014.

## **Section V(g)**

### Requirement

This section requires the Department to, within 180 days and annually thereafter, provide at least four hours of training to all personnel on providing language assistance services to LEP individuals. This training will include:

- i. SCPD's LEP plan, policies, and procedures and the requirements of Title VI and this Agreement;
- ii. How to identify the non-English language and language assistance needs of an LEP individual during an in-person or telephone interaction;
- iii. How to access SCPD-authorized, telephonic and in-person interpreters;
- iv. How to work with interpreters in the field and assess interpreter quality;
- v. How to account for cultural diversity and language barriers in policing; and
- vi. Basic command terms and phrases in Spanish for officers assigned to patrol in areas with significant Spanish-speaking populations.

### Compliance Measures

The Department is in the process of developing the curriculum for this training as described above in Sections III(d)(i) and (ii).

As this section is termed, the mandated training must take place within 180 days of the execution of this Agreement, and then be repeated on an annual basis. Within the three year term of this Agreement, a total of three four-hour blocks of instruction are required for each employee.

Although the Department has not yet trained any personnel, resources have been developed and put in place to accomplish this training by year's end. Therefore, each employee will still receive three four-hour blocks of instruction as required by this section before the expiration of this Agreement. As described above, a training schedule will commence in the month of September and provide the required training by December of 2014. Partial Compliance with this section has been achieved.

## **Section V(h)**

### Requirement

This section specifies that one year after the effective date of the Agreement, and annually thereafter, the Department will conduct a satisfaction survey of representatives from the Latino community regarding our LEP efforts. The Department will produce a report analyzing the results of each survey and detailing what measures, if any, it will take as a result of the analysis.

### Compliance

The proposed survey instrument has been forwarded to the United States as part of the April 1, 2014 report. The CRB will administer the survey and produce a final report for inclusion in the January 2015 Compliance Report. As this report is not yet due, no indication of compliance level is required.

The Department has considered the United States' feedback to the April 1, 2014 and request for further information. The Department will provide a timely response immediately following submission of this Compliance Report.

# SECTION VI

## Allegations of Police Misconduct



## **Section VI(a)(i)**

### Requirement

This section requires the Department to have a policy requiring all members to report allegations of discriminatory policing to a supervisor or to the IAB. It also requires disciplinary action be instituted for failure to comply with such policy.

### Compliance Measures

Rules and Procedures Chapter 5, §2 (Attachment 3) contains strict reporting requirements for all witnessed acts, or allegations of, any misconduct. As described in this chapter, disciplinary action is taken on those allegations which are substantiated by investigation. The requirements of R&P Ch. 5, §2 constitute Substantial Compliance.

Going forward the Department will report the results of IAB investigations into discriminatory policing as required by this Agreement and also advise the United States of disciplinary action taken as a result as soon as that information becomes available.

## **Section VI(a)(ii)**

### Requirement

This section requires that the Department maintain a policy to ensure that all complaints are investigated even if the complainant does not submit the complaint on an actual SCPD complaint form.

### Compliance Measures

Receipt of all complaints, regardless of source, is mandated by R & P Ch. 5, §2 (VI)(I) (Attachment 3), and constitutes Substantial Compliance.

## **Section VI(a)(iii)**

### Requirement

This section requires a policy that explicitly permits parties other than victims to file complaints with the HCU, with the IAB, with any officer, or at any SCPD precinct, and that complaints regarding hate crimes or hate incidents will be forwarded to an HCU investigator for review and investigation.

### Compliance Measures

The requirements of R & P Chapter 5, §2 (Civilian Complaints) (Attachment 3), and R & P Ch. 24, §6 (VI) (Hate Crimes Investigations) (Attachment 11) constitute Substantial Compliance with these requirements.

## **Section VI(b)(i)**

### Requirement

This section requires that the Department maintain a policy that all allegations of officer misconduct relating to discriminatory policing, regardless of the manner in which reported, will be forwarded to IAB no later than 48 hours from receipt.

### Compliance Measures

Chapter 5, Section 2 of the Rules and Procedures (Attachment 3) has been amended to require all complaints of biased-policing be referred to IAB within 48 hours of receipt. [R& P Ch. 5§2(VI)(C)]. Additionally, Department Memorandum 14-76 (Attachment 4) also echoes this requirement and provides further practical guidance for supervisors handling and referring biased-policing complaints. These Rules and Procedures constitute Substantial Compliance.

## **Section VI(b)(ii)**

### Requirements

This section requires that within 180 days of the effective date of the Agreement, the Department will review the staffing of IAB and ensure that individuals currently serving as or who are selected for IAB possess excellent investigative skills, a reputation for integrity, the ability to write clear reports, and the ability to be fair and objective. Supervisors with a sustained complaint history of, or who have been disciplined for, excessive use of force, sexual harassment, discrimination, or dishonesty will be presumptively ineligible from assignment to IAB.

### Compliance Measures

Inspector Michael Caldarelli, Commanding Officer of the Internal Affairs Bureau conducted a staff review on March 17, 2014 and found that all assigned personnel met the criteria of this section. Inspector Caldarelli's review constitutes Substantial Compliance.

ATTACHMENT 27 – Internal Correspondence

## **Section VI(b)(iii)**

### Requirements

This section requires each IAB investigation of officer misconduct relating to discriminatory policing be reviewed by the Police Commissioner or his designee.

### Compliance Measures

R & P Ch. 5, §1 recognizes the Police Commissioner's authority to discipline members of the Department. As a function of this policy, which is derived directly from Suffolk County Code §A13-7, no IAB investigation is complete until the Police Commissioner indicates his concurrence. In accordance with this policy, all IAB investigations, including those of discriminatory policing, are reviewed by the Police Commissioner. This procedure constitutes Substantial Compliance.

ATTACHMENT 28 - Rules and Procedures Chapter 5, §1

## **Section VI(b)(iv)**

### Requirement

This section requires that the Department maintain a tracking system for all misconduct allegations relating to discriminatory policing that does not rely on personal identifiers. Upon receipt of such an allegation, SCPD will assign a unique numerical identifier to the complaint, which will be provided to the complainant at the time the allegation is made. SCPD will use the centralized numbering and tracking system to track data regarding the number, nature, and status of such misconduct allegations, from initial intake to final disposition, including investigation timeliness and the complainant's notification of the interim status and final disposition of the investigation.

### Compliance Measures

Rules and Procedures Chapter 5, §5 details the tracking software used for IAB complaints and explains the use of initial numerical identifier when a complaint is lodged. The form used to notify the complainant is also attached in both English and Spanish. These measures constitute Substantial Compliance.

ATTACHMENT 29 - Rules and Procedures Chapter 5, §5

## **Section VI(b)(v)**

### Requirement

This section requires the Department to maintain protocols to analyze and address trends in complaints relating to discriminatory policing, including demographic data, lodged against SCPD officers.

### Compliance Measures

The IPro system detailed in Rules and Procedures Chapter 5, §5 (Attachment 29) provides tools to extract and analyze data across a wide spectrum of options. Patterns and trends of misconduct trigger an “alert” in the system which must be addressed according to the protocols set out in the oversight sections of R&P Ch. 5, §5. These measures constitute Substantial Compliance.

## **Section VI(b)(vi)**

### Requirement

This section requires the Department to conduct a six-month review of randomly-chosen, completed misconduct investigations relating to discriminatory policing. It also requires the Department to review at least 20 percent of all completed misconduct investigations since the last review. This section goes on to specify that reviews will be conducted by the Police Commissioner or his/her designee, but not an involved individual, and will require contacting the complainant to ensure the investigation was handled in a professional and thorough manner. Dissatisfaction with the results of the investigation must be documented and the case may be reopened if the complainant discloses credible new facts which would support allegations not addressed in the original complaint. Throughout the pendency of this Agreement, the results of each review will be forwarded to the United States within five business days of its completion.

### Compliance Measures

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. While each complainant offered their own narrative, all were asked the following questions:

How did you lodge your complaint?

Did you have any problem lodging your complaint?

How long did it take to speak with an IAB investigator about your complaint?

Were you asked questions about your complaint?

Were you given the opportunity to give your investigator any evidence?

Was there any evidence or facts you could not, or did not, divulge?

How do you feel your investigation was handled?

Were you advised of the result of your complaint?

Cases Audited:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This random audit of four (4) completed cases constitutes Substantial Compliance.

# SECTION VII

## Community Engagement

## **Section VII(a)**

### Requirement

This section requires that in all of its policing operations, the Department will maintain robust community relationships and engage constructively with the community to ensure collaborative problem-solving, ethical and bias-free policing, and community confidence in the Department. SCPD will maintain community and problem-oriented policing principles in its policing operations. The Department will also engage the public through the dissemination of public information on a regular basis, and will maintain systems to ensure comprehensive, effective, and transparent oversight.

### Compliance Measures

A Department wide mandate to maintain robust community relations through the performance of normal duties is contained in R & P Ch. 26, §1. This mandate mirrors the language of the Agreement and constitutes Substantial Compliance.

ATTACHMENT 30 - R & P Ch. 26, §1.

## **Section VII(b)(i)**

### Requirement

This section requires that a Community Liaison Officer be assigned to each of the Department's seven precincts. A preference for selection and assignment of each Community Liaison Officer shall be given to a sworn officer fluent in both English and a second language commonly spoken in the relevant community, if any. Each Community Liaison Officer will have training in the nature and scope of federal and state civil rights laws as applied to law enforcement activity.

### Compliance Measures

In addition to the seven precinct CLOs, the Department has committed an additional police officer to act as a county-wide CLO to coordinate operations that extend beyond precinct boundaries. A command contact list of all Community Liaison Officers is maintained by the CRB. Officers Delgado and Morales, of the Second and Third Precincts, respectively, are fluent in English and Spanish. Spanish is a relevant language for many communities within both of these precincts.

All CLOs have received an eight (8) hour block of instruction on Police Legitimacy and Procedural Justice, and will also receive the annual eight (8) hour block of instruction detailed above which addresses civil rights laws as a portion of the bias-free policing curriculum.

These measures constitute Substantial Compliance with this section.



ATTACHMENT 31 – Command CLO List

ATTACHMENT 32 – Department Memorandum 14-116

## **Section VII(b)(ii)**

### Requirement

This section requires the Department to ensure the contact information and duty hours of the Community Liaison Officers are publicly available on its website. Community Liaison Officer hours of availability for contact with the public will be during normal business hours.

### Compliance Measures

Community Liaison Officer (CLO) business hours have been fixed district-wide as 9:00 am – 10:00 pm in order to account for both the rotating shifts of the CLOs, and the varying needs of the community. Contact numbers are published under the precinct links on the Department’s web site at

<http://apps.suffolkcountyny.gov/police/precincts.htm>

At the time of this report, the links to the 4<sup>th</sup> and 7<sup>th</sup> Precinct CLOs appear on the “Contacts” page.

Notwithstanding minor technical difficulties, these measures constitute Substantial Compliance.

Going forward, in order to provide ease of navigation the IT Section will reorder the Precinct pages to reflect a link to a Community Liaison Officer page which will contain each officer’s contact information and hours.

ATTACHMENT 33 – Screenshots of Precincts 1-3, 5-6

ATTACHMENT 34 – Screenshot “Contacts” page

## **Section VII(b)(iii)**

### Requirement

This section defines the Community Liaison Officer’s duties to include the following:

1. Arranging monthly meeting of community residents to discuss issues and ask questions regarding the police department. The meeting will be attended by the Community Liaison Officer, at least one senior SCPD command staff member, and at least one officer responsible for patrolling in that particular precinct.

2. Each Community Liaison Officer will review, on a monthly basis, all concerns submitted to SCPD by members of his or her precinct to assess community issues. For those concerns that do not rise to the level of requiring formal action under SCPD policy, the Community Liaison Officer will notify the complainant that the Community Liaison Officer is available to answer the complainant's questions and respond to any further community concerns. The Community Liaison Officer will refer complaints of police misconduct relating to discriminatory policing to IAB.
3. Each Community Liaison Officer will meet at least once every six months with the respective bureau commander. During these meetings, the Community Liaison Officer will communicate any concerns or issues that he or she has received during the previous six months, along with any other relevant information pertaining to SCPD's relationship with Suffolk County residents.

### Compliance Measures

A district-wide community meeting schedule is posted on the precinct pages of the Department's website. Additionally, reminders or changes to the meeting time or location are broadcast over social media via Nixle in English and Spanish.

A Department form has been created, Community Meeting/Presentation Report (PDCS-1310a) to capture the content of each meeting and track follow-up.

The eight CLOs are in place, have been trained in accordance with this Agreement, and are providing the services it requires. These measures constitute Substantial Compliance.

Going forward, an order amending R & P Ch. 1, §5 will issue to correctly identify the duties being performed by the CLOs.

ATTACHMENT 35 – Community Meeting Schedule 2014

ATTACHMENT 36 – Community Meeting/Presentation Report (PDCS – 1310a)

The following three section all address requirements involving COPE operations. Compliance measures for all three follow.

## **Section VII(c)(i)**

### Requirement

This section requires the Department to maintain a policy which defines COPE officers as those who will be assigned to a specific area as a liaison between the community and the police department to assist the community in solving neighborhood problems.

## **Section VII(c)(ii)**

### Requirement

This section requires that the Department maintain a policy to ensure that all COPE officers engage in routine community policing and community outreach, which may include: attending neighborhood association meetings to provide input or answers, attending school functions to educate children about safety and crime prevention, assisting the community in solving non-emergency problems, addressing community decay issues (abandoned and junk vehicles, graffiti, abandoned residences and buildings, code enforcement violations, illegal dumping), meeting with business owners to provide input or answers, and helping the community to become self-reliant. It recognizes that while COPE officers may be called upon to enhance patrol efforts, this duty should be in relation to a particular community-generated request, need or identified problem and not as routine duty.

## **Section VII(c)(iii)**

### Requirement

This section requires the Department to maintain a policy which ensures that all COPE officers engage with individuals in their respective patrol areas; e.g., COPE officers assigned to patrol units in business districts should interact with business owners, and COPE officers assigned to patrol school and residential areas should interact with school personnel and residents, respectively.

### Compliance Measures

Following execution of the Agreement, the Department dedicated two (2) police officers per precinct as full Time C.O.P.E. officers. These officers do not man sector cars or perform routine patrol duties. Rules and Procedures Chapter 1, §5 (VI)(E)(2)(c) specifically defines the role of C.O.P.E. officers in accordance with this Agreement and constitutes Substantial Compliance.

ATTACHMENT 37 - Rules and Procedures Chapter 1, §5

## **Section VII(c)(iv)**

### Requirements

This section requires COPE officers to submit to their supervisors a monthly activity report documenting the amount of time they dedicated to community-oriented policing activities, the type of community-oriented activities in which the officers have engaged, and listing the organizations and individuals the officers have contacted.

### Compliance Measures

The Department is developing a report that will capture this information in a useful manner. While the type of community-oriented activities are known and documented elsewhere within each precinct, they are not quantified by individual officer. Presently, therefore, the level of compliance for this reporting requirement is Non-Compliance.

Within the next reporting period the Department will implement a monthly activity report for all C.O.P.E. officers.

### **Section VII(d)(i)**

Refers to the report submitted to the United States on April 1, 2014.

### **Section VII(d)(ii)**

This section requires that each precinct has an officer representing it in the CRB. As described above, each precinct is detailed a Community Liaison Officer who is assigned to the CRB, and an additional CLO is assigned to the CRB to coordinate operations which transcend precinct boundaries.

### **Section VII(d)(iii)**

#### Requirements

This section requires that within 90 days of the effective date, the Department will develop a survey instrument in order to solicit assessments of the CRB's success in engaging the Latino community. Additionally, each quarter SCPD will ask community and political leaders within the Latino community to critique CRB programs and initiatives. SCPD officers involved in administering CRB programs will also quarterly analyze participation and results.

#### Compliance Measures

A draft survey instrument was submitted to the United States with the April 1, 2014 report, and is attached here for convenience. In response to that report the United States made several observations regarding the survey instrument. The Department will respond and amend the instrument accordingly. The submitted survey, pending revisions, constitutes Partial Compliance.

ATTACHMENT 38 – Community Engagement Survey (draft)

## **Section VII(d)(iv) and (v)**

These sections refer to an annual report which is not yet due.

## **Section VII(e)(i)**

### Requirements

This section requires that the Police Commissioner or designated high ranking officer(s) meet with key leaders in Latino and other minority groups on a regular basis both at SCPD-sponsored meetings and at meetings held by minority groups.

### Compliance Measures

Since execution of the Agreement the Police Commissioner has attended the Martin Luther King Jr., breakfast in Hauppauge (1/20); a meeting with Latino Community leaders and the District Attorney regarding the Scott Greene matter (2/4); Latino advocate meeting at Touro Law Center (2/25); Center for Humanities meeting with District Attorney (3/12)

The Deputy Police Commissioner attends monthly meetings of the South Country Community Leadership Network (group composed of school administrators, various community leaders in the area); the Wyandanch Community Leadership Meeting (school administrators and community leaders); and the Tudor Oaks/Strathmore Ridge Communities Task Force Meeting (community leaders). Additionally, the Deputy attends weekly meetings of the Wyandanch Council of Thought and Action and the Bellport Council of Thought and Action (ex-offenders support groups). The Deputy was also a panel speaker at the Huntington Town Hall Speakout (3/24).

Finally, all Precinct commanders and executive officers attend the monthly community meetings held within their respective precincts. This participation constitutes Substantial Compliance.

## **Section VII(e)(ii) and (iii)**

### Requirements

This section requires the Department to continue its outreach programs to all members of the community (e.g. Police Athletic League, English as Second Language classes, etc.) with the assistance of bilingual SCPD officers, and will engage the Latino community on an informal basis through community events in an effort to maintain a good relationship with the Latino community

### Compliance Measures

In addition to the robust support of PAL, the Department provides community outreach through the CRB and the precinct CLOs as described above. This constitutes Substantial Compliance.


## **Section VII(e)(iv) and (v)**

### Requirements

This section requires the Department to solicit and receive input from the Community Advisory Board regarding the development of Spanish language training, and to provide Spanish language learning opportunities for officers as well as sensitivity and diversity training, including presentations administered by Suffolk-based or local Latino organizations.

### Compliance Measures

The language training curriculum is currently under development as a facet of the eight (8) hour training block described above in the Language Assistance section. Additional avenues are being explored for more extensive training through Suffolk County Community College which is co-located with the Police Academy. As this requirement is being developed, and the annual training mandate is not yet due, no compliance level is indicated.



## **Section VII(e)(vi)**

### Requirements

This section requires the Department to make all non-confidential audits and reports related to the implementation of this Agreement publicly available via the SCPD website and at the Police Department, County headquarters, and other public locations, to the fullest extent permissible under law.

### Compliance Measures

At the end of each calendar year during the life of this Agreement, the Department will publish on its web page all non-confidential audits by topic, and all reports approved by the United States in chronological order. As no time constraints are included in this requirement, and this is the first Compliance Report under the Agreement, no compliance level is indicated.

## **Section VII(e)(vii)**

### Requirement

This section requires the Department to collect and maintain all data and records necessary to facilitate and ensure transparency and public access to information related to SCPD decision making and activities, as permitted by law.

### Compliance Measures

The Department maintains all records created in the course of its business and releases them in accordance with the New York State Public Officers' Law upon request which constitutes Substantial Compliance.

## **Section VII(f)(i) and (ii)**

### Requirement

This section requires the Department to the extent it uses social media and related publishing systems, such as Nixle, to provide community members with information that includes emergency alerts, safety tips, and other public safety information, SCPD will ensure that messages that are broadcast in English are also provided in Spanish or, to the extent practicable, any other non-English language commonly spoken by community members, consistent with the requirements of Title VI. Additionally, the Department will advertise the availability of such publishing systems to the community using local and social media.

### Compliance Measures

The Department's social media updates through Nixle are presently available in English and Spanish which constitutes Substantial Compliance.

The Department will continue to research the availability of multi-language tools that will allow the broadest possible reach of all social media news and updates.

# SECTION VIII

## Policies and Training Generally



## **Section VIII(a)**

### Requirements

This section requires the Department to maintain policies and procedures that are consistent with this Agreement and that provide clear direction to ensure that officers and civilian employees enforce the law effectively, ethically, and constitutionally. SCPD will ensure that all SCPD officers and employees are trained and able to fulfill their duties and responsibilities pursuant to SCPD policies and procedures.

### Compliance Measures

The Department continues to review its policies, procedures and training curriculum to ensure consistence with the requirements of this Agreement. Additions and amendments are made on an ongoing basis as the need is identified. Because of the continued nature of this requirement, the Department's compliance measures constitute Partial Compliance.

## **Section VIII(b)**

### Requirement

This section requires that after undergoing any training required by this Agreement, SCPD will ensure that all officers who take such training will be required to pass a test demonstrating a basic comprehension of the training material after it is presented.

### Compliance Measures

As discussed above, no training has yet been conducted pursuant to the requirements of this Agreement, therefore no testing has yet occurred and no compliance level is indicated.

## **Section VIII(c) and (d)**

These sections require precision in formulating Rules and Procedures and accountability measures for carrying them out. Both requirements are core functions of the Department as described in the Rules and Procedures above. To date, no allegation of misconduct constituting a violation of any Rule and Procedure issued pursuant to this Agreement has been lodged.

## **Section VIII(e)**

### Requirement

This section requires the Department to make available to the United States any policy the United States wishes to review. It mandates that all policies and training curricula required by

this Agreement will be provided to the United States for review within five business days of completion or modification, and that within 60 days of receipt of any policy or training curricula for review, the United States will notify SCPD of any concerns it has regarding compliance with this Agreement, the Constitution, or federal law. SCPD will revise, modify, or delete any policy or training curricula required by this Agreement that the United States finds to be deficient unless SCPD shows, to the satisfaction of the United States, that it need not do so. If the parties disagree, the parties will attempt to resolve their differences in good faith.

#### Compliance Measures

Correspondence between the Department and the United States to date indicates Substantial Compliance with this requirement.

### **Section VIII(f)**

#### Requirement

This section requires the Department to implement a mechanism to ascertain whether Rules and Procedures required by this Agreement are being followed and to measure the success of the revised, modified, or newly created Rules and Procedures. That mechanism will incorporate measuring officer accountability and seeking community input as part of its metrics.

#### Compliance Measures

The Department relies upon the internal controls already in place to detect non-compliance with Rules & Procedures, and will take action within the existing disciplinary framework to remediate deficiencies. In addition to these accountability measures, the Department has also formed an action committee to oversee the successful implementation of this Agreement. This committee is chaired by the Chief of Department and attended by the Police Commissioner, Deputy Police Commission, all Division Chiefs, the Commanding Officers of the Hate Crimes Unit, the Police Academy, the Community Response Bureau, and the Information Technology Section. Feedback from community surveys as described above will also These proactive and accountability measures constitute Substantial Compliance.

### **Section VIII(g) and (h)**

These sections require the department to ensure that all policies and procedures are available to SCPD members in an electronic format and that all revised or modified policies, procedures, directives, or orders are provided to SCPD members in a manner that clearly highlights or distinguishes any modification or change within the text of the policy itself.

The platform employed by the Department accomplished these requirements for all official information disseminated by the Department and constitutes Substantial Compliance.

## **Section VIII(i)**

### Requirement

This section requires the Department to ensure that all SCPD personnel have received, read, and understand their responsibilities pursuant to the revised policy or procedure issued pursuant to this Agreement, including the requirement that each officer or employee report violations of policy. SCPD officers will be required to demonstrate that they understand the revised Rule and Procedure. SCPD will also ensure that all officers know that, if they need clarification of a Rule and Procedure, they should consult with their supervisor.

### Compliance Measures

As each policy and procedure is issued, pursuant to this Agreement or otherwise, it is collected into a monthly training bulletin which is issued and also discussed at monthly squad inspections. Policies and procedures issued pursuant to this Agreement are incorporated into the annual eight (8) hour training block described above. These training and accountability protocols constitute Substantial Compliance.

## **Section VIII(j)**

### Requirement

This section requires the Department to review each Rule and Procedure required by this Agreement within one year after it is implemented, and annually thereafter throughout the pendency of this Agreement to ensure that the policy or procedure provides effective direction to SCPD personnel and remains consistent with the Constitution, current law, and best practices. Each policy will be marked with the next date for review.

### Compliance Measures

Since annual review is not yet achievable, no compliance level is indicated.

## **Section VIII(k)**

### Requirement

This section requires the Department to ensure that Rules and Procedures made pursuant to this Agreement, including policy updates and revisions, are made available on its website in both English and Spanish and any other language commonly spoken within the community within 180 days of the Effective Date. Subsequently, Rules and Procedures made pursuant to this Agreement will be made available on SCPD's website in both English and Spanish within 60 days of each policy's Effective Date. SCPD may seek the United States' permission not to post particular Rules and Procedures on the website if SCPD provides a reasonable basis for its request.

### Compliance Measures

Rules and Procedures issued pursuant to this Agreement are presently being translated into Spanish for posting on the Department's web site. This has only been partially accomplished as of this writing, and, therefore, indicates a level of Partial Compliance.

Over the next two months, all existing Rules and Procedures issues pursuant to this Agreement will be posted on the web page, in English and Spanish.

## **Section VIII(l)**

### Requirement

This section requires the Department to check its website for accuracy, formatting, and ease of comprehension within 90 days of the Effective Date and then annually thereafter throughout the pendency of this Agreement. SCPD will ensure that all applicable Rules and Procedures on the SCPD website are translated by a competent translator.

### Compliance Measures

As detailed in a report submitted on April 1, 2014, all information is formatted accurately and arranged for ease of comprehension. Translations are being performed by a civilian employee of the Department, Miroslava Kroupka, a native Spanish-speaker who holds a Master's degree in Spanish Language. These measures constitute Substantial Compliance.

Once the process for certifying DAIs is approved, all content translations will be performed by certified members of the Department. Format and ease of navigation will continue to be evaluated and improved by the Information Technologies Section

## **Section VIII(m)**

### Requirement

This section requires the Department to ensure that policies are not duplicative or redundant and that when policies are updated, the policies they replace are no longer used and no longer referenced in other policies, practices, training materials and other department documentation.

### Compliance Measures

This function is built into the processes of the Research and Development Section which is tasked to maintain all official Department publications. As this is an ongoing function for the duration of the Agreement a level of Partial Compliance is indicated.

## **Conclusion**

The Department has accomplished Substantial Compliance with a majority of the Agreement's requirements to date. Although areas of Non or Partial Compliance with some sections of the Agreement exist, processes have been implemented to achieve Substantial Compliance by the next reporting period. Overall, the Department believes it has achieved Partial to Substantial Compliance with the requirements of the Agreement.

As this is the first compliance report pursuant to the Agreement, the Department looks forward to the United States response thereto including written confirmation of section for which substantial compliance has been achieved as well as any comments or recommendations for improvement.

Respectfully submitted,

/s/  
Christopher A. Love, Sergeant  
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Suffolk County Police Department