



Webster Groves (MO) Police Department
Assessment Report



2016

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Assessment Report
August 2016**

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A. Agency name, CEO and AM

Webster Groves (MO) Police Department
4 South Elm Avenue
Webster Groves, MO 63119

Dale E. Curtis, Chief of Police
Andrew Miller, Lieutenant and Accreditation Manager

B. Dates of the On-Site Assessment:

August 7-10, 2016

C. Assessment Team:

1. Team Leader: Stephen M. Seefchak
Major (Ret)
Aventura Police Department
6655 Palmerston Drive
Fort Myers, FL 33966
(239) 849-2221

2. Team Member: Reynolds Densmore
Chief of Police
Johns Creek Police Department
11445 Johns Creek Parkway
Johns Creek, Georgia 30087-1519
(678) 474-1550

D. CALEA Program Manager and Type of On-site:

Timothy Baysinger

Fourth reaccreditation, B size (48 personnel; authorized 46 sworn and 2 non-sworn)
5th edition Law Enforcement Advanced Accreditation

The agency uses the CACE-L Fifth Edition software program.

E. Community and Agency Profile:

1. Community profile

The City of Webster Groves is located southwest of St. Louis, Missouri and was established in 1896. The city has approximately 160 full time and 75 part time employees in several departments including Fire and Police. Webster Groves is a Charter City. In a Missouri Charter City, the City Manager is wholly responsible for the daily operation of City Departments. The Mayor and City Council are prohibited by Charter from interfering in any way with operations or issuing directives or instructions to any city employee. The responsibility of the Council is limited to constructing policy, approving the annual budget and, as a body directing the work of the City Manager. No single person on the council, including the mayor, has any decision making authority. The mayor has no veto authority on bills. According to the 2010 census, the population is approximately 23,000 and is just less than six square miles in land size. The City is the home to Webster University.

2. Agency Profile

The Webster Groves Police Department (WGPD) is a full service law enforcement agency with 46 authorized sworn positions. The agency also has two full-time civilian employees and one part-time. The Office of the Chief includes the Administrative Secretary and the Office of Professional Standards. The Division of Field Operations contains the patrol and traffic functions. The Division of Investigation and Support includes the Criminal Investigations Unit (CIU), the Community Oriented Policing Unit (COP), the Records and the Prisoner Transport Units. The city is divided into five districts for patrol response. At full staffing, all districts are manned. The minimum staffing is a supervisor and three patrol officers. Patrol officers work 12 hours shifts, with roll calls at 6:30 a.m. and 6:30 p.m. There are overlap officers to provide continuous coverage during shift changes.

The agency handles in excess of 27,000 calls for service per year on average.

3. Demographics

The demographic composition of the service area and agency are represented in the following table:

Demographics Report

	Service Population		Available Workforce		Current Sworn Officers		Current Female Sworn Officers		Prior Assessment Sworn Officers		Prior Assessment Female Sworn Officers	
	#	%	#	%	#	%	#	%	#	%	#	%
Caucasian	20,672	90	842,364	64	41	89.1	4	9.8	42	93	5	11
African-American	1,518	7	389,826	30	3	6.5	0	0	1	2	0	0
Hispanic	368	2	36,146	3	1	2.1	0	0	1	2	0	0
Other	437	2	49,811	4	1	2.1	0	0	1	2	0	0
Total	22,995	100	1,318,147	100	46	100	4	9.8	45	100	5	11

The agency has identified the Greater St. Louis area to include St. Louis and neighboring counties as the basis to define its available workforce population. Although the composition of the agency is in line with its service population, it lags behind the larger, more diverse regional population. Increasing the number of minorities and females in the sworn ranks is a priority of the agency. There has been an increase in the number of minority officers on the force since the last onsite. The agency did hire one female during this cycle, however she elected not to remain in police work as did another female officer, accounting for the slight reduction in that category.

4. Future issues

A much more critical environment for police operation has evolved since the events in nearby Ferguson in 2014. The agency recognizes the need to continue outreach and cooperation with the minority community, especially groups like the Northwest Neighborhood Coalition and North Webster Rock Hill Ministries. The civil unrest has increased pressure on funding required for training, equipment, and staffing to appropriately police demonstrations and events. Additionally, the agency is also facing a decision on purchase and the logics on the implementation of body cam wear. The agency is currently in the final stages of a study on selecting a new in-car camera vendor as well.

5. CEO biography

Chief Dale E. Curtis began his law enforcement career in September 1974. Following his graduation from the Greater St. Louis Police Academy, he served twenty-three years with the Clayton, Missouri Police Department. During that time, he worked in a number of assignments, rising through the ranks before retiring as a Captain and Commander of the Bureau of Investigation. Chief Curtis retired from the Clayton Police Department in June 1997 to accept the position of Police Chief with the City of Webster Groves, Missouri.

Chief Curtis has directed the Webster Groves Police Department the past nineteen years. During that time, he has guided the agency through major positive changes, including a reorganization that significantly increased police patrols and numerous technology advancements such as the implementation of Mobile Data Terminals (MDT's), electronic booking procedures, an automated report writing and crime analysis system, an AVL (Automated Vehicle Location) system, and others as well as overseeing a complete remodeling and construction of the police facility. He was also instrumental in the implementation of a Prisoner Transport Unit in cooperation with four other municipalities and the consolidation of public safety communications with seven other municipalities. He was the Chief of Police when the agency was first accredited with CALEA in 2004 and during each subsequent reaccreditation.

Chief Curtis has a Bachelor of Science degree in Criminal Justice from Truman State University and a Master's Degree with a double major in Management and Human Relations from Webster University. He is a graduate of Session 198 of the FBI National Academy and of the FBI LEEDS (Law Enforcement Executive Development) Program.

He is past Chairperson of the St. Louis Area Police Chiefs Association and currently serves on the Executive Board as Chairman of the Mutual Concerns Committee. He serves as Chairman on the St. Louis Regional Computer Education and Enforcement Group (RCCEEG), is a member on the Executive Board of the St. Louis County and Municipal Drug Task Force, and a member of the St. Louis County and Municipal Police Academy Disciplinary Committee. He is also a member of the International Chiefs of Police, Missouri Police Chiefs Association, and FBI National Academy Associates.

F. Public Information Activities:

Public notice and input are corner stones of democracy and CALEA accreditation. This section reports on the community's opportunity to comment on their law enforcement agency and to bring matters to the attention of the Commission that otherwise may be overlooked.

a. Public Information Session

The Public Information was held on Monday, August 8th, 2016 beginning at 5:00 p.m. Eight people were present, including two members of the agency. Three of the attendees addressed the Assessment Team, and all three supported reaccreditation. All of the speakers are local leaders involved in education or the ministry, and two are members of Webster Groves Alliance for Racial Equity. They also recommended additional programs that were shared with Chief Curtis. Three City Commissioners were present but did not speak, and the Mayor arrived just as the hearing ended.

b. Telephone Contacts

Six people took advantage of the opportunity to phone in during the telephone session that took place on Monday, August 8th, 2016, between the hours of 2:00 and 4:00 p.m. Five of the callers were from nearby agencies and expressed their support and spoke of the leadership and cooperation that is provided by the Webster Groves Police Department. One caller, Joan McGinnis, a local resident, was concerned that people may call in to complain, and she voiced her support for reaccreditation.

c. Correspondence

One letter was received at the agency from Timothy J. Lowery, the Chief of Police of the Florissant Police Department, an accredited agency in Missouri. Chief Lowery wrote to offer his support and recommendation that the Webster Groves Police Department receive reaccreditation status. A letter was also received via CALEA following the onsite from Jon Belmar, the Chief of Police of the St. Louis County Police Department. Chief Belmar also supports reaccreditation for the agency and spoke of the agency's professional and participation in mutual aid.

d. Media Interest

There was not any media interest or inquiries during the onsite.

e. Public Information Material

The agency posted notices in key locations around the city regarding the onsite and the opportunities for the public to provide input. Notices were sent to area agencies and members of local community groups and was posted on the city website.

f. Community Outreach Contacts

The Assessors had the opportunity to interact with several members of the City Council along with the Mayor, Gerri Welch, following the Public Hearing. They also met with City Manager, Steven Wylie. The Assessment team conducted three ride-alongs with agency personnel and had the opportunity to meet with Kurt Ploch, the Operations Manager of the East Central Dispatch Consortium.

G. Essential Services

Law Enforcement Role, Responsibilities, and Relationships and Organization, Management, and Administration. (Chapters 1-17)

The legally mandated authority and responsibilities for law enforcement officers is found in the Missouri State Constitution and the Revised Statutes of Missouri (RSMo). The Constitution grants the power to the state legislature to confer any powers to a city that are consistent with the Constitution and the statutes indicate that “all cities in this state shall have the power to appoint men and women as members of the police force and to prescribe their duties and provide for compensation”. The Webster Groves City Code states that there will be a police department and that the department will consist of a chief and such subordinate officers and detectives as deemed necessary.

Agency policy provides guidelines for interviews, interrogation, and access to counsel as well as conducting search and seizures without a warrant. Separate guidelines are in place for the interviewing and interrogation of juveniles. The agency makes extensive use of witness statement forms where witnesses may write out what they observed or have knowledge in their own words. The policy guidelines provide parameters for officers to follow in order to protect the constitutional rights of persons during interviews or in search and seizure situations.

Policy indicates that officers may exercise discretion based upon the premise of successfully resolving the problems at hand with a minimum of intrusion and coercion by the officer. Officers are expected to use discretion with their authority in compliance with law, public safety goals and objectives, and the law enforcement Code of Ethics.

Strip and body cavity searches may be conducted in accordance with policy that mirrors state law. Persons arrested for traffic or non-felony offenses shall not be subjected to a strip/body cavity search, unless probable cause exists to believe that the person is concealing contraband, a weapon, or evidence of the commission of crime. The person in command of the law enforcement agency where the search is to occur is to give written permission for a strip/body cavity search. Guidelines are in place to protect the privacy and dignity of a person during a strip search. Body cavity searches will only be conducted by medical personnel under sanitary conditions pursuant to a lawfully executed search warrant. Pertinent information relevant to the search shall be documented in a police report.

The agency is a party to the "Code 1000 Plan" that is both an administrative and operational law enforcement contingency plan which coordinates the commitment and deployment of police resources within the geographic jurisdiction of St. Louis County. The purpose of the plan is to provide a preplanned contingency coordination for the mobilization and management of law enforcement personnel, equipment, and expertise during a local or county wide emergency. Missouri State law allows municipalities to enter into mutual aid agreements for the effective use of all resources in the county during an emergency situation. Unless local governments pass a resolution not to participate, all political subdivisions and public safety agencies within the state are, upon enactment of an agreement, part of the Missouri Statewide Mutual Aid system. This serves as a force multiplier for agencies within the state and has been implemented several times in the last couple of years.

The agency has Memorandums of Understanding (MOU) with the Webster Groves School District to provide two officers to serve as School Resource Officers. One is assigned to the high school and another to the middle school. The agreements are in effect for 12 months and renewed each year with a fresh MOU. The agreements outline the responsibilities and obligations of both parties.

The distribution and management of written directives is done through the Police Acknowledgement SyStem (PASS). Personnel are notified of new or revised policies by email, and it is the obligation of the employee to log into the system and review and acknowledge the policy. In the event that the employee fails to do so with 14 days, an email is sent to the employee's supervisor. An electronic signature is generated when the employee acknowledges receipt and responsibility for the policy.

The Professional Standards Lieutenant is designated as the position with primary responsibility for the Planning and Research function. Other components in the agency may be assigned to assist. The responsibilities include the preparation of budgetary proposals, accreditation, and assisting in the preparation of the annual report. The position reports directly to the Chief of Police.

Division Commanders along with patrol and unit supervisors will meet annually with the Chief to review goals and objectives, functions, and specialized assignments. The progress made toward the achievement of the previous year's goals and objectives are

also reviewed and used to assist in the updating of goals and objectives for the upcoming year as well as helping with the long term planning for the next three years.

The agency has a number of special assignments, and the purpose and function of each are reviewed annually. Personnel assigned to task forces apply for a position as a detective and are then assigned to the task force. Openings for special assignments are advertised and a review is conducted by the command staff. The final selection is made by the Chief of Police.

The Chief of Police is designated by the City Charter as having budgetary authority and fiscal responsibility for the agency. The fiscal year begins July 1st. Division Commanders are tasked with doing studies within their respective divisions to develop budget requests for the upcoming fiscal year. Division Commanders will submit finalized requests taking workload assessments, goals and objectives, and reviews of special assignments into consideration.

Purchasing procedures are developed by the city's Finance Department, and the agency is required to follow established protocols. Extensive policies and guidelines are provided that are in compliance with Missouri State Law. The agency has two cash funds used by Records and for investigations. The investigative funds have not been used during the last three years. The Records fund is not to exceed \$50.00 and is used for the purpose of the sale of reports to the public. Ledgers and receipts are used for both accounts to document expenditures and revenue.

Bias Based Profiling

Agency policy clearly indicates that the uses of any bias based profiling enforcement tactics are not condoned. The practice of routinely stopping members of minority groups for violations of motor vehicle laws as a pretext for investigating other violations of law is prohibited. The policy further states that the use of bias based profiling in conducting all operations within the constitutional spectrum of the department is strictly prohibited. This includes, but is not limited to, field contacts and the seizure or forfeiture of assets.

Missouri law requires that each time a peace officer stops the driver of a motor vehicle, the officer shall report the age, gender, and race or minority group of the individual being stopped. The officer must document the reason for the stop and whether a search was conducted as a result of the stop. If a search was conducted, it must be indicated if the person gave consent or was there probable cause, if contraband was found, and was the search conducted on the person, the vehicle, or other property and was any contraband located during the search.

The Police Officers Standards and Training Commission (POST) is required by Missouri law to establish requirements for the continuing education of police officers. Officers who make traffic stops are required to receive annual training concerning the prohibition against racial profiling and such training shall promote understanding and respect for

racial and cultural differences and the use of non-combative methods for carrying out law enforcement duties in a racially and culturally diverse environment. The agency policy also indicates that if an officer has engaged in race based traffic stops, those officers shall participate in a POST approved bias profiling course that supplements the annual training requirements. The training will be provided through the agency or an outside approved training course. The agency has an in-house certified Racial Profiling Instructor who conducts the annual training.

In addition to the supplemental training, if an officer does engage in bias based profiling to include traffic stops, then additional disciplinary action may be imposed, up to and including termination. Failure to report any observed or known violations of policy are subject to the same consequences. State law provides that any additional training or counseling must take place within 90 days of the review of the action.

The Chief of Police or a member of the command staff will conduct a documented annual review of agency practices to determine adherence to policy. The review will include an annual report that is required to be submitted to the Missouri Attorney General's Office by March 1st of each year. This includes an audit of asset seizure or forfeitures, and concerns or complaints submitted by citizens. The report to the Attorney General becomes part of a larger, statewide report. The agency also includes its own review of citizen complaints or concerns.

Traffic Warnings and Citations 2014

Race/Sex	Warnings**	Citations	Total
Caucasian/Male	1251	3,622	4873
Caucasian/Female		2,659	2659
African-American/Male	294	727	1021
African-American/Female		618	618
Hispanic/Male	10	3	13
Hispanic/Female		0	0
Asian/Male	25	75	100
Asian/Female		42	42
OTHER	7	78	85
TOTAL	1,567	7,824	9,411

** Warning figures were obtained from the State's Racial Profiling Database that does not provide a breakdown by gender.

Traffic Warnings and Citations 2015

Race/Sex	Warnings**	Citations	Total
Caucasian/Male	1250	3,070	4320
Caucasian/Female		2,103	2103
African-American/Male	380	873	1253

African-American/Female		678	678
Hispanic/Male	24	12	36
Hispanic/Female		4	4
Asian/Male	18	51	69
Asian/Female		30	30
OTHER	11	84	95
TOTAL	1,683	6,905	8,588

** Warning figures were obtained from the State's Racial Profiling Database that does not provide a breakdown by gender.

Traffic Warnings and Citations 2016*

Race/Sex	Warnings**	Citations	Total
Caucasian/Male		2,339	2339
Caucasian/Female		1,658	1658
African-American/Male		713	713
African-American/Female		541	541
Hispanic/Male		9	9
Hispanic/Female		6	6
Asian/Male		26	26
Asian/Female		23	23
OTHER		119	119
TOTAL	1,001	5,434	6,435

*Through June 30th, 2016

**Traffic warning data is not available from the State until the end of the calendar year.

The number of traffic stops of African-Americans is elevated slightly when compared to the City's population, but is reduced and found to be more in line with the demographic composition of the St. Louis Count region. The State's Racial Profiling Database provides significant data for the agency to use when doing the annual review of bias based policing.

Biased Based Profiling Complaints

Complaints from:	2014	2015	2016
Traffic contacts	1	0	1
Field contacts	0	0	3
Asset Forfeiture	0	0	0

The agency received five complaints over the last three years relating to bias based profiling related issues. One complaint in 2014 was investigated when a driver indicated that a traffic stop was motivated by racial bias and the officer used racial slurs and conducted an improper search. As part of the internal investigation, the in-car video was reviewed and indicated that the officer used considerable constraint and that reason for the stop was valid. The complaint was unfounded. There were four complaints

received during the first half of 2016. One was resulting from a traffic stop and the other three were from field contacts. The complaints were investigated and determined to be unfounded or not sustained. It was believed that the complaints were filed to see how the agency would respond as there is still a heightened state of concern and tension resulting from the Ferguson situation.

Use of Force (1.3)

It is the policy of the WGPD to accomplish its police mission as efficiently as possible with the highest regard for human dignity of all persons and a minimum reliance on the use of physical force. In vesting officers with the lawful authority to use force to protect the public welfare, a careful balancing of all human interests is required. The use of physical or deadly force shall be restricted to circumstances authorized by law and only to the degree minimally necessary to accomplish a lawful task. Webster Groves Police Officers are authorized to use to protect the officer or other from what is reasonably believed to be an imminent threat of death or serious bodily harm or to prevent the escape of a fleeing felon whom the officer has probable cause to believe will pose an imminent threat to human life should the person escape. Warning shots are prohibited.

The agency's less lethal weapons include Oleoresin Capsicum (OC) Pepper Spray, the TASER M26 or X26 Energy Conducted Weapon (ECW), and the ASP collapsible baton. Policy provides clear guidelines on the use of each type of lethal and less lethal weapon. Officers are required to receive training in each type of weapon before they are authorized to carry it.

After a use of force incident, the officer will address the medical needs of the suspect as well as anyone else involved. If it is the officer's opinion that the suspect needs medical attention, or if it is requested by the suspect, then the suspect will be transported to a medical facility after the supervisor is notified. If the officer has any doubt about the need for medical attention, then the suspect should be transported to a medical facility for evaluation.

A Use of Force report is required when an officer directly presents or utilizes a firearm or when any intermediate weapon is presented or utilizes an intermediate weapon in order to gain control and compliance of a suspect. The supervisor is to be notified and they will be responsible for conducting an investigation into the use of force. The officer is to complete Part I of the Use of Force report based upon the circumstances surrounding the use of force, and the supervisor will complete Parts II and III pertaining to the suspect's information and the witness information respectively. A copy of the report is sent to the Shift or Divisional Commander, the Division of Field Operations Commander, and the Chief of Police. The report is reviewed by the Divisional Commanders who forward recommendations to the Chief of Police for the final review and approval. The City Manager and the City Attorney are kept fully informed and consulted throughout the process.

The firearms instructor maintains records on each approved weapon. The ECW Instructor is responsible for maintaining records associated with the ECW's. A matrix

depicts each type of approved weapon and ammunition that is authorized for carry by the agency. Trigger locks are issued to each member of the agency authorized to carry a firearm. The use of the trigger lock is mandatory when the weapon is not under the officer's immediate control.

The agency has in-house instructors for each type of weapon used by the agency. Training consists of classroom time on the Use of Force policy, the use of force continuum, medical care for suspects, and the use of the weapon. A written exam and a demonstration of proficiency or qualification is required before the officer may carry or continue to carry a weapon. The agency has its own indoor range located in a city facility. The range has four lanes that can be used for handguns and shotguns. It is equipped with software that can be programmed for multiple courses of fire as well as situations with low light, no light, and when lighting is provided by strobes or emergency lights such as a police vehicle might use.

The annual Use of Force Analysis is prepared by the Division of Field Operations Commander. The analysis reviews several factors including temporal suspect factors as well as the types of force used, citizen complaints, and the number of custodial arrest. The analysis is detailed and prepared on a timely basis.

Use of Force

	2014	2015	2016*
Firearm	1 (displayed)	3 (displayed)	2 (displayed)
ECW	1 (displayed)	0	2 (1 display)
Baton	0	0	0
OC	1	0	2
Weaponless	7	4	6
Total Uses of Force	10	7	12
Total Use of Force Arrests*	10	7	12
Complaints	0	0	0
Total Agency Custodial Arrests	514	559	328

*Through June 30th, 2016

The agency has a low incidence of using force and has not any actual discharges of firearms or ECW's since the last onsite. Weaponless tactics is the use of force type that is used more often. In 2015, there were less uses of force reported even though the number of custodial arrests increased. The first half of 2016, however, has already generated more uses of force than the two previous annual cycles. The agency attributes this to more subjects challenging officers as a result of recent events. A more detailed explanation would be expected as part of the next annual analysis that is due in January 2017.

Personnel Structure and Personnel Process (Chapters 21-35)

The compensation package provided for agency members is comprehensive. Salary compensation, including differentials and augmentation are contained within the

ordinance. A broad leave program includes bereavement, sick, vacation, compensatory time, and vacation. Procedures for taking the leave are established in policy. Members who have at least one year of service and have worked at least 1250 hour are eligible for a Family Medical Leave of Absence of up to 12 weeks. The pension plan is part of the Missouri Local Government Employee Retirement System (LAGERS). There is a mandatory four percent employee contribution and employee becomes vested after five years of service. The city and the employee equally share the expense of dependent coverage and domestic partners are eligible for current medical and dental plans. An education reimbursement program exists where members must receive a C or higher to be eligible. Webster University also has a program for employees with at least 60 credit hours to get a Bachelor's Degree with a certain number of credits being available for no charge.

The assistance that is to be provided to an employee and family members in the event of a line of duty death or serious injury is set forth in policy. One officer who was shot during the response to the unrest in Ferguson was tended to medically but the agency provided a number of services for the officer's wife including transportation, providing someone to be with her at the hospital, providing after care and counseling, including a fully funded trip to Huntsville, Texas for the officer and his wife to attend a Post Critical Incident seminar.

An Employee Assistance Program (EAP) is available to all employees through Magellan Health. Services are confidential. As part of the St. Louis County Police Academy's Supervisory curriculum, all supervisors receive training in the identification of adverse behavioral patterns in their subordinates. Supervisors who feel a referral may be in order for a subordinate will submit a memo to the Division of Field Operations Commander describing the behavior. The memo is then forwarded to the Chief of Police for final approval. Participation in the EAP is mandatory at the direction of the Chief.

Policy is in place in the event a member of the agency is deployed for military leave. The Chief of Police is the designated point of contact.

The agency has a performance evaluation system using the City of Webster Groves Employee Based Performance Appraisal System. The system exceeds the CALEA standard by conducting the appraisals twice a year. The City publishes a manual that serves as a guide for completing the evaluation and meeting with the employee. The manual lists the procedures for conducting the evaluation and completing the appraisal form. Any items relating to CALEA standards not contained in the manual are addressed in agency policy. Both address the responsibilities of the rater. Supervisors receive training on performance planning, coaching, and the preparation of the performance appraisal along with ongoing supervisory training.

Behavioral patterns that could trigger an alert from the Early Warning System (EWS) include, but are not limited to absenteeism, work and ethical issues, workplace safety injury and insurance claims, and grievances. These are indicated as being possible

precursors to serious misconduct and the key to the proper identification that a problem exists is supervisory recognition of a pattern of negative or improper behavior. Supervisors are to document observations during the semi-annual performance appraisal. Specific occurrences will be documented. Upon completing the review, the supervisor is to submit a memorandum detailing the extent of the problem along with any supporting facts, conclusions, and recommendations for remedial actions. The Division Commander's recommendation options are that no additional action is necessary, provide informal counseling and continued monitoring, provide remedial or additional training, or that a referral to the EAP is in order.

Grievances

Issues that may be grievable are identified in policy that also identifies issues to be addressed by the chain of command including working conditions, relationships with supervisor and fellow employees, and policies to include the City's Personnel Rules and Regulations as they are applied to the employee. Grievances are covered under Webster Groves Personnel Article 10. Issues related to the classification of positions, overtime provisions, personnel rules, compensation, discharges, layoffs, demotions, and suspensions of more than three days are appealed to the Personnel Board. Time limits for each side to respond are provided for each step of the process. The process may eventually progress to the Assistant City Manager before going to the Personnel Board. The Personnel Board will issue its findings to the City Manager in writing. The City Manager will then issue the final decision on the matter.

There have not been any grievances filed in the last three years. An annual Grievance Analysis is prepared by the Chief of Police. The analysis for each year is similar and attributes the lack of grievances over each of the last few years to the CALEA process which helped create policies and procedures based upon national standards and models.

Disciplinary

The Code of Conduct and appearance guidelines are contained in the section of policy on Duties and Obligations and are available to all employees via the PASS system and by hard copy at several locations throughout the station. The guidelines for drug testing are also contained here. Drug testing is required for all employees based upon reasonable suspicion or when they are involved in certain specified types of incidents such as an accident with a fatality or serious injuries while operating an agency vehicle or after the discharge of a firearm.

The agency's harassment policy is contained under the heading of "prohibited conduct". It indicates that any employee that feels that they have been subjected to inappropriate conduct or harassment may register a complaint by contacting one of several specified positions including the immediate supervisor, any Commander, Chief of Police, Director of Human Resources or the City Manager. If the subject employee is in the chain of command, the grieved employee may go to the next higher person in the hierarchy. The employee has the right to contact the Director of Human Resources or the City Manager at any point during an investigation to receive an update. Retaliation is

prohibited. If it occurs, the employee must contact the Director of Human Resources or the City Manager.

An Awards Committee has been established to review, process, or make recommendations concerning awards to nominees in consideration of acts of valor or any other outstanding performance of duty or service. The committee consists of the Chief or his nominee, designated Commanders, the Professional Services Lieutenant, and a sergeant not directly involved with the submission. When possible, awards are presented at the next City Council meeting. Policy indicates how medals and ribbons are to be worn and the criteria for what they are awarded for.

Supervisors may recommend training or counseling in order to correct shortcomings or areas of performance where improvement is needed for minor infractions. More serious infractions are handled by the use of reprimands, suspensions, reduction in pay or grade or dismissal. An employee found to be guilty of gross negligence, failure to maintain minimum standards and qualifications, insubordination, or conduct detrimental to the good name and reputation of the agency are grounds for dismissal.

The role and responsibility of each level of supervision in the disciplinary process is described in policy. Recommendations may be made up the chain of command. The Chief of Police will review recommendations as to whether the improper conduct has been sustained as well as the type of discipline that is appropriate. Employees may grieve disciplinary actions including reprimands through the normal grievance process. There have not been any disciplinary appeals during this reaccreditation cycle.

Personnel Actions

	2014	2015	2016*
Suspension	0	1	1
Demotion	0	0	0
Resign In Lieu of Termination	0	0	0
Termination	0	0	0
Other	0	0	0
Total	0	1	1
Commendations	3	8	4

*Through June 30th, 2016

The agency has only had to resort to the use of formal discipline twice in the last three years. In both cases, suspensions were issued to the officers involved. Fifteen commendations for outstanding performance were also issued during the same time period.

Recruitment and Selection (Chapter 31 and 32)

The agency does not participate in a continuous recruitment effort as it only recruits to fill actual or forecasted vacancies. It will continuously communicate with potential applicants and promote affirmative hiring when vacancies occur. The agency does

involve itself directly or indirectly in activities critical to the recruitment effort. Activities include the recruitment of pre-service academy applicants at the St. Louis County and Municipal Police Academy and the Eastern Missouri Law Enforcement Academy who are not yet committed to another agency. Notices will also be sent to other nearby certified training centers as well as local colleges and universities that have existing Criminal Justice programs or a student body with a substantial number of minorities or females. The agency also participates in job fairs and maintains an activities log of events and colleges that they have attended in support of recruitment activities. Letter have also been sent to ministers associated with local churches that work with the Webster Groves Clergy Alliance for Racial Equity asking for their assistance in finding suitable police officer candidates.

The agency does have a recruitment plan that lists the above activities as part of the plan of action. The Professional Standards function assists the City's Human Resources Director with recruitment activities. An annual analysis of the plan and activities is conducted and the agency indicates that it has done a good job of reaching the targeted demographic audience but there is a lot of competition with 71 state and local law enforcement agencies in the St. Louis County area. The analysis reports indicate that there were only 29 minority recruits in the local police academies in 2015 and only 34 in the two previous years combined.

Sworn Officer Selection Activity in the Past Three Years

Race/Sex	Applications Received	Applicants Hired	Percent Hired	Percent of workforce population
Caucasian/Male		8	4.2	37.2
Caucasian/Female		1	0.5	40.4
African-American/Male		2	1.0	8.7
African-American/Female		0	0	9.4
Hispanic/Male		0	0	1.2
Hispanic/Female		0	0	1.3
Other		0	0	1.8
Total	191	11	5.7	100

Years reported 2014, 2015, 2016

Population percentage based on 2010 Census

The agency received 191 applications during the last three years. The Human Resources Department does not maintain a breakdown of the racial and gender demographics of the applicants. Eleven applicants were hired during this cycle including two African-American males. One female was also hired upon graduating from an academy but did not stay in police work. Another female member of the agency also left for another position outside of law enforcement. The agency faced stiff competition for applicants at one academy as St. Louis was also heavily active in recruiting due to suffering from an exodus of police officers among the ranks.

Training

The Training Committee is comprised of members of the Command Staff who meet on a semi-annual schedule to evaluate the current training efforts, identify developing needs, and eliminating or modifying less effective training efforts. The committee is composed of the Commanders of each division and the Training Coordinator. The Training Coordinator will advise the Commanders on training issues and will prepare a report based upon the results and recommendations from the meeting and submit the report to the Chief of Police. A matrix shows each employee in the agency and the number of hours of training they have received over the course of the year. Sub-groups that are listed on the matrix include legal, inter-skills, technical, skills, and profiling.

Personnel regularly attend POST approved courses at two nearby training academies. The agency also has several in-house instructors who can provide additional training on an ongoing basis. Lesson plans are prepared and submitted for each course and include the objectives for the training session. Lesson plans are discussed and approved during regularly scheduled staff meetings. Tests are identified and the scores for passing a course are listed.

Remedial training is provided when an instructor, commander, or shift supervisor determines that an employee is in need of additional training based upon the employee's lack of knowledge, skills, or abilities to do a task or function related to the assignment if it is recommended that the additional training will improve future performance. Should affected employee fail to participate or satisfactorily complete the training, he or she may be subject to disciplinary action, including dismissal, as approved by the Chief of Police. The only remedial training that was conducted during this cycle was for traffic issues in 2014.

The agency has an agreement with the St. Louis County and Municipal Police Academy to provide continuing education programs. The agency is invoiced each year by the academy. The cost is based upon the number of full time and reserve officers (\$150 each) and the number of dispatch personnel (\$50 each). The agency does not have any reserve officers or dispatchers. It should be noted that the St. Louis County and Municipal Police Academy is a CALEA Accredited Training Facility. New recruits attending the academy receive training based upon job tasks of the most frequent duties associated with police officers. Missouri POST mandates that recruits receive a minimum of 600 hours of training. The St. Louis County and Municipal Police Academy provides 360 hours of supplemental training. Another nearby academy provides an additional 400 hours.

The agency assigns a Field Training Officer (FTO) to each newly hired probationary police officer to oversee the training of the new officer and to ensure that the new officer receives training on agency policies, procedures, and rules and regulations. The FTO is governed by the Webster Groves Police Field Training Guide. The guide also establishes guidelines for the supervision of FTOs. Probationary officers with at least one year of experience will participate in a FTO program of at least four weeks in

duration. Probationary officers with less than a year will receive between eight and twelve weeks of FTO training. Officers wishing to be a FTO undergo a selection process. Each must have at least one year with the WGPD and receive a recommendation from a supervisor and platoon commander, and successfully complete a Missouri POST approved Field Training Officer program.

Newly hired civilian personnel will receive an orientation and training in the agency's role, purpose, goals and objectives, policies, and procedures as well as working conditions and rights of employees. There were not any new civilians hired during this reaccreditation cycle.

Ethics (1.1.2)

The agency has adopted the IACP Code of Ethics and all members are required to abide by the Code. Ethics training is provided annually to all personnel as part of the monthly training schedule. The Ethics policy and the Code of Ethics is addressed during each session.

Promotions

The Chief of Police will assist the City's Human Resources Director when a promotional process occurs. This ensures that the agency will take an active role in the development of the criteria used in determining the skills, knowledge, and abilities used to determine promotional suitability. The Chief will have primary responsibility for providing candidates with a list of reference materials relevant to the promotional examination and for scheduling oral interviews. Following the exam, the Chief makes recommendations to the City Manager for which candidates to select from the eligibility list for promotion. The Chief may select from the top three candidates.

Current supervisors complete a Supervisory Potential Evaluation on each candidate. The process consists of a written examination and oral board for sergeant candidates. Lieutenant candidate also take a written examination and have an oral interview with the Chief. A candidate has ten days from the date the results are mailed to appeal the process. Appeals are reviewed by the Chief and the Human Resources Director. Lateral entries are not permitted.

Written tests are based upon criteria found in reports to the International Public Management Association. Questions for the oral board are job related and nondiscriminatory based upon a review of the questions maintained by the agency from past tests. Candidates are judged and rated based upon skills associated with supervisors and managers. Lieutenant candidates also have a written assessment where they are provided with three questions and given an hour and a half to answer them. There are no right or wrong answers, but honest responses are desired. The answer may be discussed during the interview with the Chief.

Sergeants and Lieutenants must each have a Bachelor's Degree from an accredited college or university. The eligibility list is normally for one year at the discretion of the

Chief. The successful candidate must serve in a probationary status for one year from the date of promotion.

Sworn Officer Promotions

PROMOTIONS – 2014-2016			
	2014	2015	2016
GENDER / RACE TESTED			
Caucasian/Male	8	0	10
Caucasian/Female	1	0	0
African-American/Male	0	0	0
African-American/Female	0	0	0
Hispanic/Male	1	0	1
Hispanic/Female	0	0	0
GENDER/ RACE ELIGIBLE AFTER TESTING			
Caucasian/Male	7	0	10
Caucasian/Female	1	0	0
African-American/Male	0	0	0
African-American/Female	0	0	0
Hispanic/Male	1	0	1
Hispanic/Female	0	0	0
GENDER/ RACE PROMOTED			
Caucasian/Male	2	0	2
Caucasian/Female	0	0	0
African-American/Male	0	0	0
African-American/Female	0	0	0
Hispanic/Male	0	0	0
Hispanic/Female	0	0	0

Promotional processes were held in 2014 and 2016. Two people were promoted in each process. Nine candidates were assessed in 2014 and eleven in 2016. There was one female candidate in 2014 and one Hispanic male who went through the process in both cycles, however neither was successful in being promoted.

Law Enforcement Operations and Operations Support (Chapters 41-61)

The agency provides patrol services on a continuous around the clock basis. Patrol personnel are assigned to platoons that work 12 hour shifts. The platoons are split into two squads. Each platoon is staffed with a sergeant and five officers. Personnel are currently rotated from the day shift to the evening shift every 28 days but plans are being discussed to move to a more permanent shift assignment schedule. Roll calls are

conducted at the beginning of each shift and pertinent information is shared. Officers receive roll call training frequently.

Officers operating police vehicles in emergency mode are required to exercise reasonable care under the circumstances of the emergency to prevent injury to themselves or others. The agency has guidelines in place as to the circumstances in which police vehicles may respond to emergency calls. Code Three responses are not authorized to responding to peace disturbance calls unless there is the element of serious peril to human life.

The agency has a comprehensive policy regarding the response to missing person calls. Officers obtain the information and description and disseminate the information through the Regional Justice Information System (REJIS). AMBER alerts are issued through the St. Louis Regional AMBER Alert Committee (SARRA) in order to better coordinate and communicate information regarding missing children who are believed to have been abducted.

The Criminal Investigation Unit (CIU) is staffed by a sergeant and five detectives. Detectives are available after hours on an on call basis. The CIU sergeant is also responsible for the evidence function and maintains the intelligence files. Cases are assigned and tracked through an investigative report management software system. Two detectives are assigned to regional task forces. One is the St. Louis County Drug Task Force and the other is a regional computer crimes investigative unit. Informants are referred to the drug task force that maintains the files, however they are available to member agencies when needed. Vice, drugs, and organized cases are normally referred to the task force.

The agency School Resource Officers (SROs) are active in the local schools and conduct the Drug Resistance Education (DARE) program in the middle school. A member of the CIU is assigned to function as a juvenile detective. Juvenile suspects are only permitted to be interviewed by a Deputy Juvenile Officer from Family Court. The Deputy Juvenile Officer is responsible for reading the constitutional rights to the juvenile and must be present for all interrogations.

The WGPD has implemented a social media program in order to further enhance communications with the community and crime prevention efforts. The agency currently operates accounts using Facebook and Twitter. The Captain of the Investigations and Support Division is responsible for oversight and managing the accounts. The agency currently has 1,661 followers on Facebook and 289 on Twitter. The agency is active and participates in community events in order to educate residents on crime prevention trends and methods to avoid becoming a victim. The agency's Citizens Police Academy has been successful and is quite popular.

The Traffic Unit is staffed with a sergeant, two officers, and a parking control officer. Selective enforcement is conducted based data from crash reports, citizen complaints, and traffic studies. Motorcycles are utilized and are equipped with speed detective

devices as are patrol vehicles. The unit is also using social media as a tool to educate the public on traffic safety and activities. Members of the unit have also received advanced training to conduct traffic homicide investigations. The City has a Traffic Advisory Committee to review changes in signage and ordinances and make recommendations on traffic issues to the City Council.

Crime Statistics and Calls for Service

Year End Crime Stats

	2014	2015	2016*
Murder	0	0	0
Forcible Rape	4	3	3
Robbery	7	5	3
Aggravated Assault	17	12	3
Burglary	47	50	32
Larceny-Theft	103	90	103
Motor Vehicle Theft	12	16	9
Arson	0	2	0

*Through June 30th, 2016

The agency is fortunate in that there has been a low incidence of Part 1 crimes over the last three years. Generally, there have not been any significant increases or decreases in any category except for Aggravated Assaults. There was a reduction in 2015 of almost a third, and thus far in 2016, there is similar trend with only three being reported so far which is only a quarter of the previous year.

Calls for Service

2014	2015	2016*
27,854	27,750	13,744

*Through June 30th, 2016

Calls for service have remained consistent over the three year period. There was a slight decline in 2015 and through the first six months of 2016, the agency is on track again for a slight decline or similar results for the previous years.

Vehicle Pursuits

Officers are authorized to engage in vehicle pursuits under a limited number of situations. They include when a suspect has committed or attempted to commit a felony that would result in a full custody arrest, when a subject has used or threatened to use deadly force, or when there is a substantial risk that the suspect will cause death or serious physical injury if an apprehension is delayed. Officers must consider the seriousness of the offense and if the perpetrator presents a continuing threat to public safety. Vehicle pursuits for minor traffic violations are prohibited.

The responsibilities of the major role players in a pursuit are clearly established in agency policy. Pursuits are limited to just two vehicles, the primary and the secondary. Additional units may participate at the direction of the supervisor who must justify the

use of additional units. The agency does not permit the use of road blocks. Personnel may engage in intra-jurisdictional pursuits provided the reason for the pursuit meets the criteria to engage in a pursuit, if the pursuing agency request assistance and the overall conditions are favorable for a pursuit. Webster Groves personnel may only be involved while the pursuit is within the city limits unless there is only one other police vehicle involved.

The primary officer in the pursuit will prepare a detailed and concise memorandum as well as a report of the incident. The supervisor will submit a separate memorandum as to the actions of subordinates during the pursuit and a recommendation for discipline or remedial training if warranted. The documentation will be submitted to the Chief of Police who will decide the appropriate action to take, if any.

The Division of Field Operations Commander will prepare an annual analysis of all pursuits for the previous year and submit all findings to the Chief of Police.

Vehicle Pursuits

PURSUIITS	2014	2015	2016*
Total Pursuits	1	0	1
Terminated by agency	1	0	0
Policy Compliant	1	0	0
Policy Non-compliant	0	0	1
Accidents	1	0	0
Injuries: Officer	0	0	0
: Suspects	0	0	0
: Third Party	0	0	0
Reason Initiated:			
Traffic offense	0	0	0
Felony	1	0	1
Misdemeanor	0	0	0

*Through June 30th, 2016

Only two vehicle pursuits have occurred in the last three years. The agency does have a restrictive pursuit policy in order to minimize the threat to public safety. Both pursuits were for felony subjects. One was found to be not in compliance with agency policy, and corrective action was taken and training was provided. One accident occurred during the pursuit in 2014, but fortunately, no injuries were reported.

Critical Incidents, Special Operations and Homeland Security

The City of Webster Groves has one big event each year, and that is Community Days around the 4th of July holiday. The event lasts several days and several components are involved. The event includes a carnival and a parade.

Due to the agency's proximity to Ferguson, Missouri, the agency has received considerable experience in the last few years in dealing with civil unrest, disturbances, and protests. The agency responded to the civil unrest in Ferguson in 2014 and again on subsequent occasions when the need arises. During the onsite, the agency was

assigning officers to assist anticipated and planned activities due to it being the second anniversary of the event that triggered the unrest in Ferguson.

The agency has had to prepare for planned protests within its own jurisdiction as well. The agency implements a plan for each event that is reviewed by the Command Staff as part of the pre-planning process. After action reports and reviews are conducted in order to better prepare for future events. The agency has had considerable experience in using the Incident Command System (ICS).

Internal Affairs and Complaints against employees

The Captain of Field Services and Operations Division functions as the position responsible for the administration of the Administrative Review component. The agency defines an administrative review as the formal investigative process by which internal or external complaints, reviews of incidents or situations, allegations or accusations of misconduct or wrongdoing against a member, or members, of the department by citizens, supervisors, fellow officers or other persons are investigated and reviewed. An administrative review is an internal affairs function that the agency considers important of the maintenance of professional police conduct and the overall integrity of the agency. It is the policy of the agency to accept, investigate and review all complaints.

The type and nature of the complaint will determine whether it can be handled and resolved at the line supervisory level or investigated by the Division of Field Operations Division Commander. Formal complaints are the more serious allegations that include brutality, misconduct, violation of civil rights, and misuse of force among others. Informal complaints include complaints about rudeness or improper reporting.

The Field Services Commander reports directly to the Chief of Police and is responsible for notifying the Chief immediately about matters that fall under the scope of a formal investigation. Complaints may be made by mail, telephone or other correspondence, orally or in writing. Anonymous complaints are accepted and investigated based upon the information provided. Investigations are to be completed within 30 days unless extensions are requested and granted by the Chief due to extraordinary circumstances.

Upon receiving a complaint, the Field Operations Commander or a supervisor will contact the complainant and let them know that the complaint has been received and is being investigated. The complainant will be informed of the investigative process and will be provided with periodic status reports. At the conclusion of the case, the complainant will be informed of the disposition of the investigation in writing. Employees will be notified of the allegations and their rights when a complaint is filed. The agency policy establishes guidelines as to when an officer may be relieved of duty or suspended. When the investigation is complete, a conclusion of fact will be stated for each allegation and provided to the employee as to whether the allegation was sustained or not sustained, if the employee was exonerated, or if the complaint was unfounded.

Complaints and Internal Affairs Investigations

External	2014	2015	2016*
Citizen Complaint	3	3	7
Sustained	0	2	0
Not Sustained	1	0	5
Unfounded	2	1	2
Exonerated	0	0	0
Internal			
Directed complaint	0	0	0
Sustained	0	0	0
Not Sustained	0	0	0
Unfounded	0	0	0
Exonerated	0	0	0

*Through June 30th, 2016

There has been a low incidence of complaints filed against the agency over the last three years, although the number through the first half of 2016 has exceeded that over the two previous years combined. Discussions with members of the staff indicate a feeling that some members of the public are testing or probing the agency to see how it responds to complaints. A full review will not be completed until after the end of the year. There have not been any internal investigations generated during this reaccreditation cycle.

Detainee and Court Related Activities; Auxiliary and Technical Services (Chapters 70-84)

Officers are required to search assigned vehicles at the beginning of their shifts and again after each transport of a detainee. Restraints are placed on all adult detainees unless they are sick or injured. It is up to the officer as to whether to restrain a non-violent juvenile officer or not.

One officer is designated as the Prisoner Transport Unit (PTU) and is responsible for the transportation of detainees from the regional jail for city court days. The PTU is also assigned to any planned event where the arrest of multiple subjects is anticipated.

The agency does not operate a detention facility; however, detainees are brought into the station to complete the booking process in a Temporary Holding Area. Policy requires two officers to be present while a detainee is being processed. The area is also monitored via video by personnel at the East Central Dispatch Consortium that provides the communications for the agency. Separate and secure areas are available for multiple prisoners or to provide sight and sound separation for detainees of the opposite sex. State law requires juveniles to be transported to the designated juvenile facility.

Officers are assigned the detail to provide security for City Court. Officers who work the detail are full-time officers with the agency and are trained in the court security operations. Security measures are in place and have been tested according to standards.

The East Central Dispatch Center handles the communications function for the WGPD and five other municipalities. It is housed at the neighboring Richmond Police Department and is governed by a Board of Directors. The cost-sharing made possible by the consolidate effort enables the Center to provide efficient services and the highest level of technology. The Assessment Team visited the Center and found it to be in compliance with all CALEA standards. The video monitors for the agency booking area were also observed and found to be operational and working properly. All member agencies are CALEA accredited or in self-assessment

The Records Unit is staffed by a single Records Clerk. The area is secured, and limited access is permitted. The unit appears to be operated in an efficient and orderly manner. Reports are taken in person only and not by mail, telephone, or over the internet. The Records Unit maintains a cash account for the purpose of collecting fees for providing copies of reports to the public.

The WGPD utilizes Uniform Patrol officers to perform basic crime scene processing. Officers are properly trained and certified prior to performing these duties. Officers have all of the basic equipment necessary to process most scenes. Any major crime scene will require the notification and presence of the on-call detective, who will then assume command of the crime scene. If necessary, assistance may be summoned from other neighboring agencies to assist.

Property and Evidence

The Evidence room is located on the lower floor of the police facility next to the Criminal Investigations Unit. The primary custodian is the Criminal Investigations Supervisor. The room is not alarmed but is secured within the facility by a quality lock and the key is controlled by the CIU supervisor. High risk items such as firearms, narcotics, and cash are secured in separate safes within the evidence area.

All inspections and audits were conducted on time and in accordance with policy. The Property Custodian has not changed during this cycle. A member of the Assessment Team checked several items randomly and they were promptly located and matched the corresponding paperwork.

It was noted that DNA samples and blood kits were contained within a locked refrigerator apart from the evidence room. Although it was secure, the Assessment Team was of the opinion that it would be more secure if it was located within the evidence room. While this was not deemed to be a compliance issue, the agency followed up on the Assessor's recommendation and purchased a new refrigerator and had it placed in the evidence room within 24 hours.

H. Standards Issues Discussion:

This section provides specific information on standards found to be in compliance after on-site “adjustments” were made. Adjustments may include modifying agency policies and directives, creating documentation, and an alteration of the physical plant.

The agency did not have any Standard issues.

I. 20 Percent Standards:

CALEA agencies must be in compliance with at least 80% of applicable other than mandatory (O) standards. The agency is free to choose which standards it will meet based on their unique situation.

The agency was in compliance with 89% of applicable other-than mandatory (O) standards.

J. Future Performance / Review Issues

The agency did not have any future performance issues or standards that needed additional review.

K. Table: Standards Summary:

	<u>TOTAL</u>
Mandatory (M) Compliance	<u>291</u>
Other-Than-Mandatory Compliance	<u>76</u>
Standards Issues	<u>0</u>
Waiver	<u>0</u>
(O) Elect 20%	<u>9</u>
Not Applicable	<u>108</u>
TOTAL	<u>484</u>


L. Summary:

Agency files were found to be in excellent order with satisfactory proofs and directives. It will begin the transition to the PowerDMS system after the current process has been completed. No Standard Issues were found by the Assessors and this was consistent with the previous onsite review. The agency was receptive to recommendations and suggestions made by the Assessors as indicated by the purchase of a new refrigerator for the evidence function as a means to improve the security and integrity of the unit even though it was not required to demonstrate compliance. Time sensitive reports were completed on schedule in a timely manner.

The Assessors found the agency to be in compliance with all applicable standards. It was evident that the proofs went well beyond the files and that the accreditation process was imbedded in the agency's culture.

The Webster Groves community has an interest in working the agency in maintaining positive relations with the police department. The agency has several programs designed to solicit cooperation an input and is making active efforts to provide community policing programs in specific areas in order to maintain positive relations while maintaining order. The Citizens Police Academy is very popular and well received. The agency's proximity and continued involvement with activities in Ferguson and the injuries sustained by one of its members serves as a catalyst to continue to build relationships within the community.

An exit interview was held with Chief Curtis and key members of his staff at the conclusion of the onsite. The Assessment Team discussed its findings and indicated that a positive recommendation would be provided to the Commission with the caveat that the final decision on the agency's reaccreditation would be determined at the next meeting of the Commission.


Stephen M. Seefchak
Team Leader
September 30th, 2016

Revised:
02/13/08
02/19/09
03/26/10
10/01/15