

Columbus (Ohio) Division of Police

Roadmap to Implementation



COPS ★
Community Oriented Policing Services
U.S. Department of Justice

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I. Overview

In April 2021, the City of Columbus and the Columbus Division of Police (CDP) requested assistance from the U.S. Department of Justice (DOJ). The areas identified by the CDP as a focus of the technical assistance included policy reviews and evaluation and associated training; recruitment, with a focus on diversity; technology, including establishing an early intervention system and better integration of systems; staffing, specifically areas where civilianization can be leveraged; and leadership training. The U.S. DOJ Office of Community Oriented Policing Services (COPS Office) agreed to provide technical assistance to include tailored consultation, training, and the development of a roadmap for implementation of reforms. The COPS Office, in conjunction with technical assistance providers 21CP Solutions and the International Association of Chiefs of Police (IACP), assisted the CDP and community stakeholders with developing a reform plan to help meet their public safety goals. The COPS Office strongly encourages CDP to conduct an independent review of their use of force practices and policies as they see fit given that this was outside of the scope of this review. The intent of this roadmap is to build a foundation for reform that will grow stronger as changes are implemented, helping to ensure the approach to public safety in Columbus continues to evolve as the city does.

21CP Solutions conducted a general review of CDP policies, procedures, and written directives, as well as meetings and observations during onsite visits. The team also reviewed previous assessments conducted of the CDP to help build off of previous findings and recommendations. This work informed the development of the framework for this roadmap, intended to assist CDP, city officials, the community, and other stakeholders take the next steps in public safety in Columbus. At the same time, the IACP, through the COPS Office Collaborative Reform Initiative Technical Assistance Center (CRI-TAC), provided direct and customized training opportunities for CDP personnel.

This document highlights completed technical assistance and outlines a roadmap to support the implementation of reforms within Columbus. The team added some additional recommendations to account for gaps in the previous assessment reports. Once the information in this document is shared with the CDP, and they and community stakeholders agree with this plan, the team will work directly with the Division to host implementation working sessions.

A. Technical assistance conducted

Through this technical assistance engagement, the COPS Office teams provided technical assistance in a variety of areas. The CDP identified the following areas as the focus for technical assistance: policy reviews and evaluation and their associated training; recruitment, with a focus on diversity; technology; staffing, specifically areas where civilianization can be leveraged; and leadership training.

The 21CP Solutions team assisted the CDP with the following technical assistance:

- Established ongoing communication among the subject matter experts (SMEs) and Chief Elaine Bryant, including guidance and mentoring
- Assisted with strategic discussions between the IT Director and CDP leadership
- Reviewed the most recent staffing study for thoroughness and accuracy
- Reviewed CDP organizational design and provided recommendations and guidance during the rollout of the three-phase organizational design shift
- Reviewed the recruitment, hiring, and officer safety and wellness practices
- Assisted in the areas of leadership, training, recruitment, technology, staffing, and community engagement, including by highlighting promising and emerging practices
- Facilitated strategic implementation planning sessions

The CRI-TAC team assisted CDP with the following technical assistance:

- *Procedural Justice and Implicit Bias* Train-the-Trainer Training – 8 participants (June 6–10)
- *First-Line Leadership* Training – 28 participants over two sessions (June 27–29, July 25–27)
- *Mid-Level Leadership* Training – 12 participants (August 8–10)
- *Executive Leadership* Training – 15–21 participants based on the day (August 29–September 2)

B. Assessment and implementation of previous reports

In the last three years, the City of Columbus and CDP have had three assessments completed that include recommendations for recruitment, hiring, and retention:

- The Matrix Consulting Group submitted an operational review of the CDP which included a review of the Human Resource Section in August 2019. This report had five recommendations related to recruitment, hiring or retention.¹
- The Columbus Community Safety Advisory Commission submitted a report on their review of the CDP's recruitment, training, policies, and procedures in January 2020 to Mayor Andrew J. Ginther, which had 16 recommendations on recruitment and testing.²
- An Audit of City of Columbus Entry-Level Police Recruitment and Selection was delivered by Winfred Arthur, Jr to the Columbus Civil Service Commission in November 2021. This was a comprehensive review of the recruitment and selection of police officers and listed 38 recommendations.³

¹ Matrix Consulting Group, *Report on the Police Division Operational Review*, Columbus Ohio, August 19, 2019.

² Columbus Community Safety Advisory Committee, *Report*, January 28, 2020, 37–48, 63–65.

³ Reed, Elizabeth, *Audit of City of Columbus Entry-Level Police Recruitment and Selection*, November 17, 2021.

The team's review of these reports found them thorough and complete. Therefore, the team recommends the City of Columbus, the Civil Service Commission, and the CDP work together to prioritize and implement their recommendations as described in Section C. These recommendations are being addressed by different entities in Columbus and tracked on an online portal.⁴ While this work is ongoing, regular and consistent messaging from a variety of city entities, not just the division, should be disseminated in public forums to update the community about progress and which recommendations may not be implemented and why. Many community members told the team that they do not know what is going on with the recommendations from the studies and do not believe the work is effectively reaching the community. Therefore, it is recommended that the CDP bring all parties together to create one, comprehensive approach to addressing these documents. This is the first step towards implementing reform. Other major action steps required for implementation are outlined in the next section.

Many of the recommendations in the reports focus on the area of recruitment, retention, and hiring; this implementation plan reflects that emphasis, while including some other areas for improvement. The recommendations in the aforementioned reports, plus the additional recommendations the COPS/21CP team have included in this implementation roadmap, will serve as a foundation for the future action plan.

C. Major implementation steps

To assist with the implementation of recommendations from previous reports as well as those from this roadmap, the team recommends the following steps:

1. **Establish a Leadership Group.** Establish a leadership group with members from the City of Columbus, Columbus Civil Service Commission (CCSC), the division, and the community. This group should be charged with reviewing the recommendations from each of the three previous reports to determine their feasibility and sort them into priority categories. This group can be expanded to include other key stakeholders as appropriate.
2. **Select Recommendations for Implementation.** There are sixty-two recommendations across the three reports, and not all of them may be feasible. A review of the recommendations may find some recommendations are repeated in all three reports or may find some contradictions between them. This initial sorting should only remove recommendations that are either not doable because of barriers which cannot be overcome, or that have already been implemented. The rationale for rejecting any recommendation should be documented.

⁴ [City of Columbus Division of Police, Community Safety Dashboard, https://cpd-portal-columbus.hub.arcgis.com/](https://cpd-portal-columbus.hub.arcgis.com/).

3. **Prioritize Recommendations.** The prioritization of the remaining recommendations can be sorted into three categories—short-, mid-, and long-term—based on factors like resource demands, interdependencies of recommendations, level of complication, and change management concerns. The strategic importance of a recommendation will also play a role in prioritizing recommendations for implementation.
 - Short-term recommendations are easier to implement and require only immediately available resources.
 - Mid-term recommendations are easy to somewhat difficult to implement and require new or additional resources.
 - Long-term recommendations are difficult to implement or require more time and that must involve resources and people from outside the agencies on the leadership team, like the unions, the legislative branch of local government, or the state of Ohio.
4. **Create an Action Plan.** A detailed action plan should be developed which lists each recommendation, who is responsible for implementing it, a timeframe for its completion, and its status. The agency assigned to implement each recommendation should develop its action plan—for example, the CDP will develop an action plan for every recommendation that falls to them, and the CCSC and the city will do the same for theirs. Action plans for recommendations which require more than one agency to accomplish should be developed jointly. Developing these plans can be assigned to staff outside of the leadership group; however, the leadership group should review and approve the action plans. The list of actions or tasks for each recommendation should include any required training and a means of assessing training compliance. A sample template for an action plan is provided in Table 1. Although the plans' exact format is not important, it is essential that they establish responsibility, time frames, and expectations for status updates. A thoughtful, concise action plan is an essential first step in the implementation process.
5. **Establish an Accountability System.** Once a plan of action is developed, the next step is to establish a system which ensures that the work is done, challenges are addressed, and barriers are removed so that recommendations can be implemented. The sample template in this memo can be used as a reporting mechanism. A monthly meeting on progress with the Leadership Group, which must be adequately staffed and supported by city leadership, will help maintain focus and momentum.
6. **Routinely Report Progress to the Public.** The work plan can be used to generate a report to update the public on the progress made. This report should be updated at least quarterly and should be posted on the appropriate agencies' websites. The current Columbus Public Safety Dashboard can be leveraged for this implementation step.

Table 1. Sample Reporting Mechanism

Area	Recommendations	Action or Task	Lead	Target Date	Actual Progress	Status
Recruitment	<i>List recommendations</i>	<i>List initiatives from Step 1</i>	<i>List initiative owner</i>	<i>Include target goal set during planning progress</i>	<i>Include most recent status</i>	<i>Code in color</i>
	1.1. The CDP Recruitment Unit shall be reassigned to the Human Resources Bureau with no patrol responsibilities.	1.1.1 Determine the impact on patrol 1.1.2 Determine how the impact may be mitigated. 1.1.3 Prepare the transfer order.	CDP – specific person	Transfer will occur by the end of the first quarter.		Complete
	1.2. The CDP should take efforts to fill the vacant HR manager position with someone trained in human resource management and assess where the position should be placed within the Public Safety Framework.					In Progress
Hiring	2.1 The CDP should consider dropping the CSC Physical Test (Phase IV) and use only the OPOTA physical fitness test as candidates have to meet the OPOTA standards to be certified and enter the Academy		CSC – specific person			Overdue
Retention	<u>3.1.</u> The CDP should work with the FOP to implement an enhanced merit-based promotion system where seniority plays a reasonable role.		CDP and FOP			Not Yet Started

II. Team Recommendations

A. Organizational structure

The CDP's organizational structure is the means through which the division accomplishes its mission, goals, and objectives. There are several ways in which the work of an organization can be structured, and decisions about how the structure is developed require an understanding of the distinctions between line, staff, and support functions. The number of levels and the degree of centralization must also be addressed.

The CDP organizational structure is a work in progress. The first organizational chart presented to the team, dated June 30, 2021, depicted a structure that conflicted with several basic organizational principles. Chief Bryant made a number of changes in the structure that were announced on March 7, 2022; these changes significantly improved the structure with the creation of a second assistant chief. Under the new structure, one assistant chief is responsible for the patrol and investigative function subdivisions and the other for support services, special operations, and public accountability subdivisions. The new structure also moved the public information unit to the chief's office.

The chief plans to make further adjustments to the organizational structure in the coming months. The next proposed change increases the number of patrol zones from 5 to 6, moves the community liaison unit to Assistant Chief Pott's command, and establishes a separate homicide bureau. The final planned structural change adds a third assistant chief who will be responsible for the support services subdivision. This proposed final organizational structure substantially addresses the issues and concerns with the June 30, 2021, structure. CDP's three-phased operational structure plan satisfies outstanding concerns from the team. As currently planned, the final structure will increase the division's efficiency.

i. Recommendations: Organizational structure

Community Response Bureau

The Community Response Bureau is in the North Patrol Subdivision and contains the Community Liaison Section and the Community Impact Section. The Community Impact Section includes the Police and Clergy Together unit (PACT). The PACT unit, staffed by 15 sworn officers on temporary rotating six-month assignments, is responsible for handling prostitution, nuisance abatement, and drug houses.

The Community Liaison Section is staffed by full-time officers assigned to each precinct and dedicated to working with the community residents. It will move to the first assistant chief's command in the next iteration of organizational structure change. This is an unusual location for an operational unit of this nature, but the move is necessary at this time to address the required oversight and reforms needed in the unit. The chief believes, based on past experience, that the assistant chief is in the best position to quickly develop the Community Liaison Section into a strong community-engaged problem-solving initiative. After the restoration of the unit, this section should be assigned to the patrol function and report to the zone commanders who are responsible for the precincts.

1. **The PACT Unit assignment should be expanded to 2 to 3 years for full-time officers before they rotate.**
 - a. Six months is not sufficient time to obtain the necessary training and receive a return on the investment in training.

Crime Analysis

The CDP has made a substantial investment in the crime and intelligence analyst positions. The division currently has six crime analysts (one for each patrol zone) and four criminal intelligence analysts assigned to various investigative functions. The analysts report directly to the commander of the area in which they are assigned. The patrol analysts used to be co-located, but some have recently moved with their patrol zone commanders to their zones. Some did not move with their commanders because the stations did not have sufficient space.

Interviews with patrol commanders indicated there are concerns about the analysts. There is no formal onboarding process, so the training new analysts receive is inconsistent and based largely on what the individual commanders think they need. The analysts lack oversight by supervisors familiar with analysis, and coordination between analysts is limited. The analysts spend a considerable amount of their time working with the zone commanders to prepare the crime strategy meetings that at times are more report outs rather than strategy discussion

1. **The division should designate or employ a crime/intelligence analysis supervisor to provide oversight of this function.**
 - a. The supervisor would be responsible for
 - i. developing standardized products;
 - ii. coordinating work among the analysts;
 - iii. ensuring the analysts are properly trained and equipped to do the job.
2. **Leadership should reconsider returning to the original intent of the Crime Strategy meetings and focusing on developing a strategy to address crime, to include reassigning personnel and resources to address the identified problems.**

Human Resources

Recently the CDP Human Resources function and the IT support were moved under the direction of the Public Safety Director's Office.

1. **To allow for the most efficient organizational placement, oversight, and control of these functions they should be returned to the CDP.**

B. Technology

There is a clear gap between the city IT infrastructure and that inside of CDP. After reviewing the CDP IT structure and its placement in previous organizational charts and getting a further understanding of the citywide IT structure, the team remains concerned that the CDP has a deficit in functional systems that can efficiently synchronize to produce valuable data and tracking at CDP. Further, based on the current city structure of IT management, no one from the CDP is directly present when IT requests from the division are presented and approved or disapproved by the citywide IT board. The team agrees there should be a mechanism that addresses the full citywide IT system's needs, priority, and integration to ensure coordination across city bureaus. The team feels, however, that in Columbus the current process excludes SMEs knowledgeable about law enforcement from its IT board and so is making decisions without a full understanding of law enforcement IT issues and national best practices.

i. Recommendations: Technology

1. **The CDP should undergo a technology audit to identify the numerous operating systems inside the division and assess their efficacy.**
 - a. This process should result in an IT plan for the division that can be presented to City IT for implementation
2. **An MOU and/or citywide policy should be created that establishes clearly defined roles and responsibilities for the internal IT department of the CDP, the Public Safety Department of Columbus, and the IT systems administrators for the city.**
3. **The CDP should develop a policy and procedure that shifts all reporting and records management to a digital process.**
 - a. It is the team's understanding that current internal technology allows for all police reports to be written online and submitted online, but that supervisors and commanders still prefer to do everything in paper form through the archaic blue sheet method.
 - i. The problem with paper reporting is the high likelihood for human error, as well as for calculation mistakes that can skew data reporting and decrease the division's ability to track crime trends, officer data collection errors, and disconcerting behaviors.
 - ii. By shifting to a digital system, the division can reduce the burden on personnel, increase accuracy, reduce duplicative processes, and reduce time that personnel are spending submitting and transferring paper reports.
 - iii. This practice should end immediately and the entire division should be made to switch to the electronic system already designed for this task. Doing so will also improve transparency and accountability functions with the public by allowing for better crime reporting and data sharing.

C. Training

Throughout the technical assistance engagement, CRI-TAC has led the effort to bring key trainings to the division. CRI-TAC has offered the CDP a comprehensive package that addresses their current climate and skill set adequately.

In addition to CRI-TAC support (see Section I.A. for the list of CRI-TAC trainings), the team has identified other programs that could benefit CDP in the near future: for example, community policing and problem oriented policing training, procedural justice training, report writing/technology use training to bring CDP reporting systems into an electronic format, and continued education in ethical policing practices.

i. Recommendations: Training

1. **The division should explore adding a City Attorney–based training in the Academy.**
 - a. This training could do a deep dive into policies and practices most commonly seen in legislation by the City Attorney’s office, as well as a best practice dialogue on understanding key points of Ohio law that are specifically important to those in law enforcement.
2. **The division should partner with the City Attorney's office and as necessary use an external entity to develop a plan to allow attorneys to regularly audit training sessions to stay abreast of their delivery and merit, such that they remain consistent to their original intent.**
3. **The CDP needs to enable personnel to participate in external specialized training opportunities such as FBI trainings, PELI, IACP, etc. This plan should have two parts:**
 - a. A general order prescribing the trainings that are available for varying officers and ranks, as well as the defining language and the request process for attending said trainings
 - b. A clear definition of duty for academy leadership regarding consideration of officers’ training requests.

D. Community engagement

An agency that adopts community policing “embraces a broad view of the police function rather than a narrow focus on crime fighting or law enforcement.”⁵ A closer partnership with the community makes community members active collaborators and co-producers of public safety. In communities around the country, law enforcement agencies are recognizing that an agency that is highly attuned to the needs of a community can serve it better than one that sees the community as the “other,” or even as the entity “served”. Therefore, all CDP sworn and nonsworn personnel need to see community problem-solving

⁵ Trojanowicz, R., and B. Bucqueroux, *Community Policing: A Contemporary Perspective*. (Cincinnati, OH: Anderson Press, 1990).

and engagement as their fundamental role and task on a shift-to-shift basis. The platform that the Community Liaison Officers and the Academy have created in the division should be expanded to become a sustained, ongoing philosophy for delivery of public safety services.

To begin this effort the CDP should design and implement an integrated, comprehensive community- and problem-oriented policing model. Such models are the foundation of programs and training offered by the DOJ. In addition, identifying a methodology that can best serve Columbus's unique culture should start with a firm understanding of the SARA Model for problem-oriented policing services.⁶ Also critical is training for officers and leaders alike on the principles of procedural justice which, among other benefits, can help officers identify where there may be teachable moments for students that do not necessarily need to lead to an arrest or charges.⁷ CDP community engagement and partnership efforts need to be grounded in person-to-person listening, candor, humility, and open-mindedness.

The team consistently heard positive sentiments about the new leadership of the CDP. The chief is seen by many as accessible and engaged. Many from the community are hopeful about her plans and efforts to reform the division but remain skeptical that the broader Columbus city government is up to the challenge, citing ongoing concerns about the Department of Public Safety, the hiring practices of the Civil Service Commission, and the challenges the new chief must face in managing the current CDP staffing shortage and the recent buy-out program's effect on the division.

The team shares these concerns especially around the CDP community liaison officers (CLO). As stated in the Organizational Design section of this memo, the Community Liaison Unit and its office has been largely unmanaged and unscrutinized for efficacy for a number of years. The result has been that the division staffs the unit with officers at the end of their careers, more interested in soft engagements and conversation than the rigors of day-to-day police work. Upon meeting a pool of CLOs and their commander, the team was struck that CLOs cannot be forced to go on a call by the patrol commander in their precinct—rather, they are allowed to pick and choose attractive calls via the radio and go “support their fellows officers.” In addition, many defined themselves as “patrol backup,” there to do the work those answering calls do not have time to complete, such as a traffic report after an accident.

Regrettably, the CLOs interviewed by the team also defined their duties at length with little to no understanding of community-based problem solving. CLO is seen as the feel-good job in the division, and CLOs were excited to talk about the wonderful youth engagement activities they do such as reading to elementary school children or passing out frisbees at the dog park. However, the training for the CLO position to date does not appear to offer substantive training in community based problem-solving, despite it being a part of the job description. CLO leadership did not identify addressing public safety issues or following the SARA model to collaborate with community on nuisance calls and other low-level areas of concern as measures of evaluation or expectations of CLO duties. Rather, the CLOs and their

⁶ Trojanowicz and Bucqueroux, *Community Policing: A Contemporary Perspective* (see note 5).

⁷ Quattlebaum, M., T.L. Meares, and T. Tyler, Principles of Procedurally Just Policing, SSRN Electronic Journal, 2018, <https://doi.org/10.2139/ssrn.3179519>.

leadership defined the role more as an ambassador or face of the division, being in public spaces to share good news and heartwarming activities with little focus on engagement as a means to establish legitimacy and trust-building through crime prevention and partnership. Although the team does not discourage positive interactions such as those described, community policing is everyone's responsibility. Where CLOs are used, they should be used to extend the chief's message to the community and get feedback on public safety concerns from the neighborhoods they serve, working towards collaborative solutions with the community and other city partners alike. However, based on the team's review of the CLO Standards and Operating Procedures (SOP), this is not the intent of the officers or the unit.

In addition, as conduits for the division's message to the community, ambassadors for the chief, and as the leads in problem-solving and collaboration with the community, CLOs need to be adequately trained in community policing practices and the SARA model for problem-solving and have access to an active division-wide crime plan that can be combined with community led concerns or initiatives.

i. Recommendations: Community engagement

1. **The CDP needs to develop a Comprehensive Neighborhood Strategy that will engage the community in a broader understanding of a shared public safety vision.**
 - a. This plan should also include a clearly defined organizational structure, new trainings for all officers highlighting their own education on the plan, and a clear definition of the CLOs' role and how they may be accessed by the community.
2. **The CLO job description needs to be redefined to clearly outline engagement through the lens of problem-solving and fair and impartial policing practices with subsequent training for all CLO unit members. In addition, the chief needs unfettered ability to assign officers with specialized and unique qualifications to the unit.**
 - a. The CDP should engage the union on the CLO job description revisions to ensure management and labor share the goal of advancing public safety and officer well-being.
 - b. The CDP should discuss removing the "senior-based only" requirement for the CLO position
 - c. Once the CLOs come back online after these changes they can resume the role but regular meetings, at least once a quarter, should continue between CDP leadership, CLO leadership, and the City Attorney's Office to ensure everyone understands the mission and values reflected in the Public Safety Plan and the status of its implementation.
3. **CLOs should help deliver the CDPs' Comprehensive Neighborhood Strategy message to the community on a regular basis, lead dialogue about where it is working and where it is not, so that problem-solving may occur and the city, CDP, and community can respond.**
 - a. CLOs should be seen as a critical piece of the CDP's external communication plan, regularly briefed on emerging issues; changes in policy, practice or training; and community events and needs.

4. **Accountability measures need to be established to hold CLOs accountable to their new job description and their ability to deliver problem-solving solutions and communication both to the community and to CDP leadership.**
 - a. Based on the requirement for all data and reporting requirements to be entirely electronic, CLOs should be able to track their activities with relative ease, helping the division to do [micro community policing](#) assessments or possible plans in the future.
 - b. CLOs should share problem-solving needs with academy classes looking for community projects and develop a menu of needs in the community that can be engaged in with academy classes.
 - i. CLOs should be mentors to the cadets and a voice for the community, to establish relationships that are then continued by the cadets after training.
5. **All personnel, sworn officers and civilian alike, must operate with the philosophy that community policing and engagement is everyone's duty, rather than that of a single division.**
 - a. Subsequent training to enhance these skills in officers should be offered to all.
 - b. Community engagement should not be limited to one unit within the CDP. The presence of a community engagement unit can convey to members that it is only that unit that has the responsibility for community engagement. While this may not be the intent, the organizational chart suggests that a small number of personnel are responsible for all community engagement.
6. **The CDP should provide regular, unassigned time for patrol officers to engage with community stakeholders, business owners, faith leaders, youth, and the community at large and to address community problems.**
 - a. At the same time, it should establish mechanisms for officers to log their community engagement and problem-solving activities.
 - b. Creating opportunities for increased engagement by all CDP members will increase the public's trust in and the legitimacy of law enforcement in Columbus. Where the CDP's organizational design, staffing, and calls for service can align to provide a structure that allows officers time between calls to engage in walking patrols, bike patrols, and invitational events such as school engagements and youth events, the CDP can increase its presence and be seen as a part of the broader community
7. **The CDP should consider broader use of foot, bike, Segway, and other alternatives to motorized patrols in police vehicles for officers.**

III. Conclusion

The Columbus Division of Police is a promising institution, well positioned to make positive, self-driven reform in the coming years. After two extensive site visits, an in-depth review of policies and practices, discussions with leadership, and the range of technical assistance provided, the CDP has begun the hard work of putting the division on a path to becoming a stronger agency. While public safety is best advanced by collaboration among many agencies, the division plays a critical role in advancing public safety. Twenty-first-century policing also requires agencies to work collaboratively with the communities they serve and city partners both public and private. City leadership and other departments within any city have a duty to participate in the safety and well-being of everyone in their community. The recommendations made to the CDP by the previous reports, as well as those in this report, require a citywide collaborative model. Columbus leadership should give serious consideration to determining which recommendations should be operationalized and should inform the public which of recommendations will be implemented and the rationale for rejecting those that will not.