



## Civil Rights

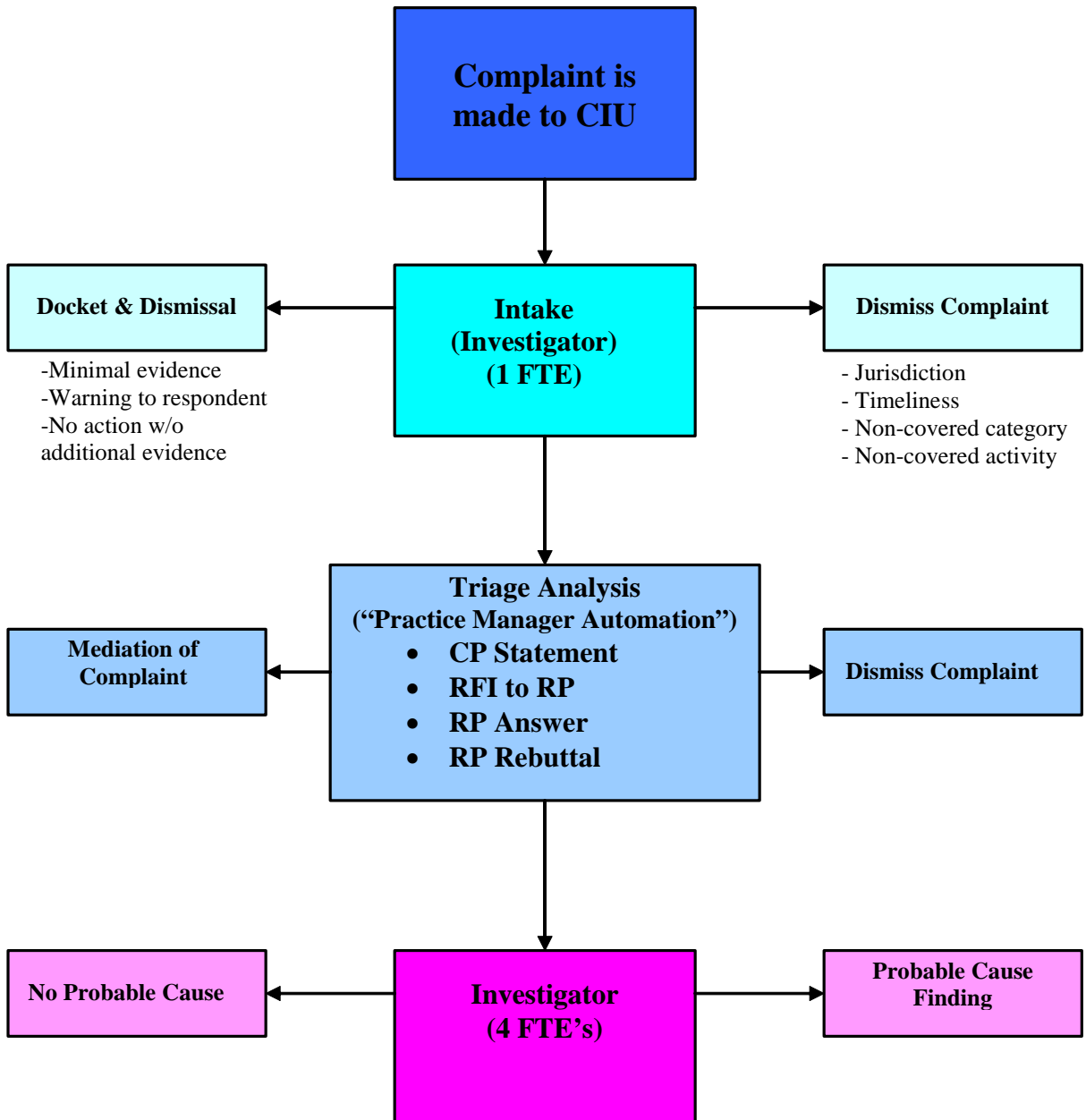
September 22, 2009

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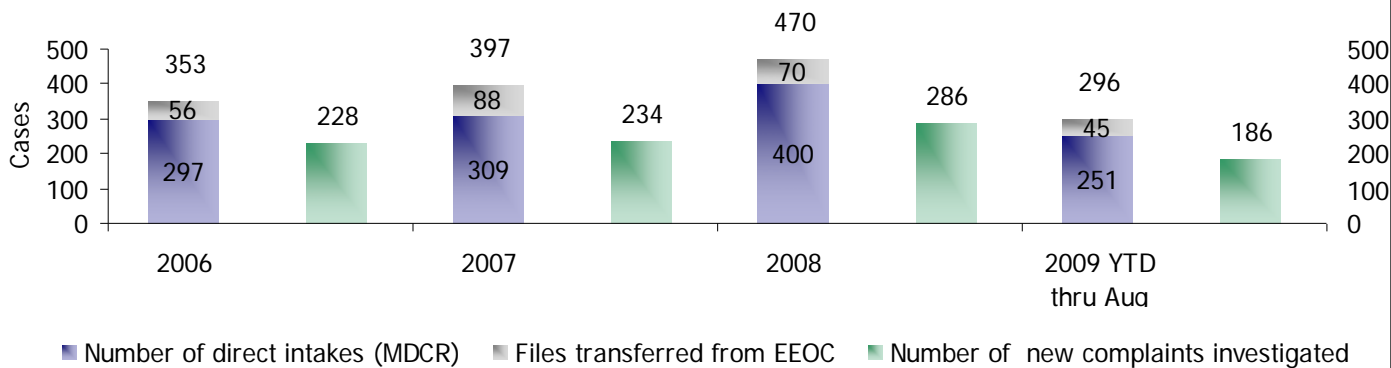
## Civil Rights

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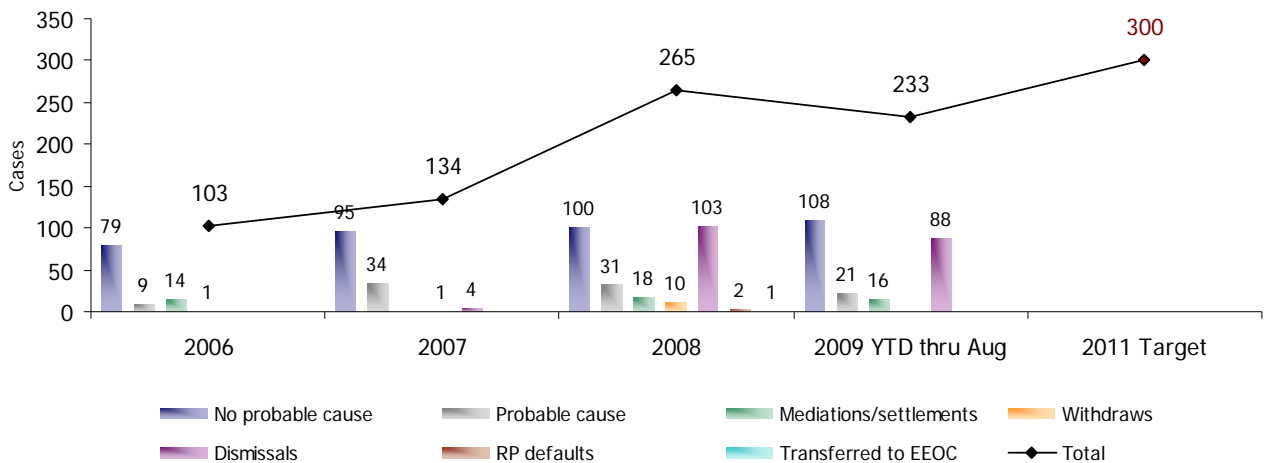
# Business Process Improvement project: CIU process



## Total cases considered by the Complaints Investigation Unit and complaints investigated



## Composition of Complaint Investigation Unit cases closed



### Why is this measure important?

New complaints in and of themselves are not necessarily an accurate indicator of the level of discrimination or our effectiveness in outreach and education. However, the rate at which new complaints are filed has an obvious impact on the resources that are necessary to investigate complaints in a timely manner and eliminate the existing backlog of past complaints.

On a related issue, several policy makers have asked for information relative to incorporating a measure relating to monitoring the incidence of repeat and/or multiple complaints. Such a measure, and the identification of those entities who were the subject of repeat and/or multiple complaints, could assist in the development of targeted intervention strategies (i.e., education, council, sanctions) that would optimize our limited resources.

The new triage process adopted from the Business Process Improvement (BPI) project allows for the evaluation of incoming complaints to the Complaint Investigation Unit and reduced the number of charges that are fully investigated. Therefore, the new process allows us to focus investigative resources on the most viable complaints and quickly dismiss charges that are frivolous or lack merit. Charges that are transferred to the CIU from the EEOC and charges that are cross-filed with the EEOC are fully investigated in accordance with federal rules and regulations and are not subject to the dismissal process.

To that point, we have identified respondents and complainants who have been parties to repeat and/or multiple complaints.

- There are 5 individuals who have filed 5 or more allegations of discrimination.
- There are 6 companies with 7 or more allegations of discrimination filed against them by employees.

We have not published them in this document for several reasons, including:

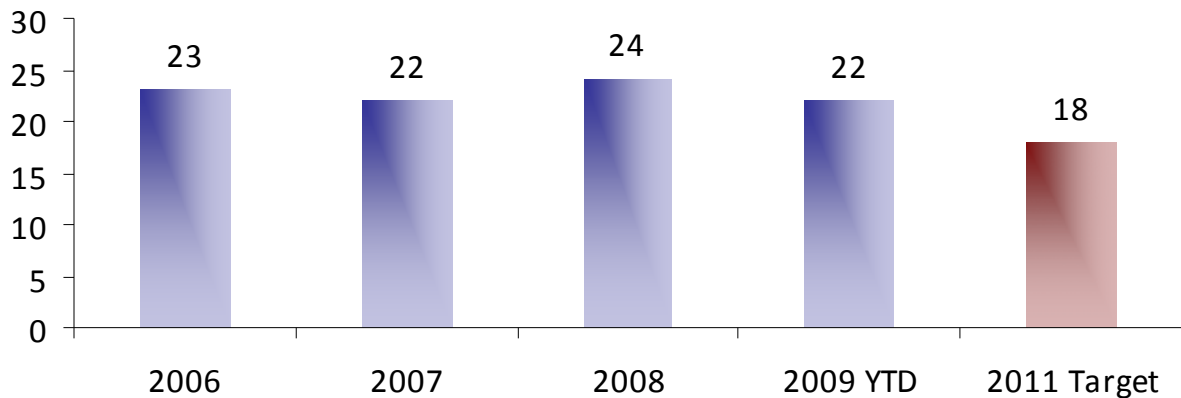
- Multiple complaints do not necessarily equate to factual multiple transgressions
- There are complainants who file multiple complaints that are consistently not well founded
- We do not want to publicly “slander” or “label” employers, or other respondents, with incomplete or inaccurate information

With the new Practice Manager database we can now monitor respondents who have received repeat and/or multiple complaints and we do structure intervention strategies on a case by case basis.

### **What will it take to make progress?**

There is no action required, in this case. The target is an estimate based on past results. However, we assume that there will an increase in the number of future complaints based on the current economic environment.

## Average time elapsed from filing to determination of complaints investigated (in months)



### Why is this measure important?

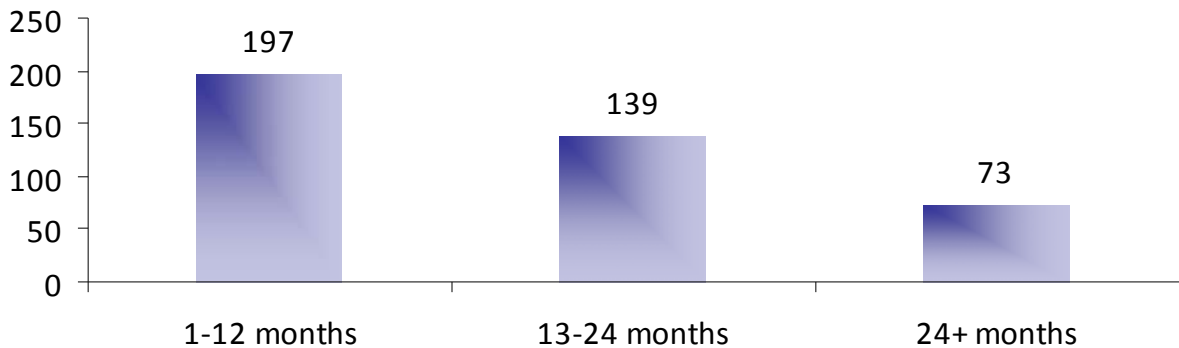
This measure is a significant indication of the efficiency of our Complaint Investigation Process. It is important that we process filed complaints in a timely manner, so that we provide a proper response and service to the complainant and the respondent and to eliminate the backlog of charges to be investigated. There is also legal jeopardy that can affect our determination if the completion time is excessive.

### What will it take to achieve the targets?

Completion of the Business Process Improvement Initiative has provided the methodology and a work plan to achieve the target related to reduction of the average elapsed time from filing a complaint to determination (cycle time reduction). We firmly embrace the mantra of "Better. Faster. Cheaper." We expect to begin to see cycle time reductions within the first year of implementation. The diagram on page 3, is an illustration of the new CIU process that resulted from the Business Process Improvement Initiative. We began implementation of the revised CIU process in January 2009. Additionally we completed the transition to the CAO Practice Manager in March 2009. The CIU will maintain a copy of the old Sherlock database for any future litigation and in accordance with data retention rules and regulations.

We are beginning to see positive improvements from these systems enhancements relative to the time required to complete an investigation. Long term, we would expect to develop the ability to complete investigations of complaints within 12 months. This is the statutory requirement for the Minnesota Department of Human Rights.

## 2009 YTD aging CIU caseload (sum of 409 cases)



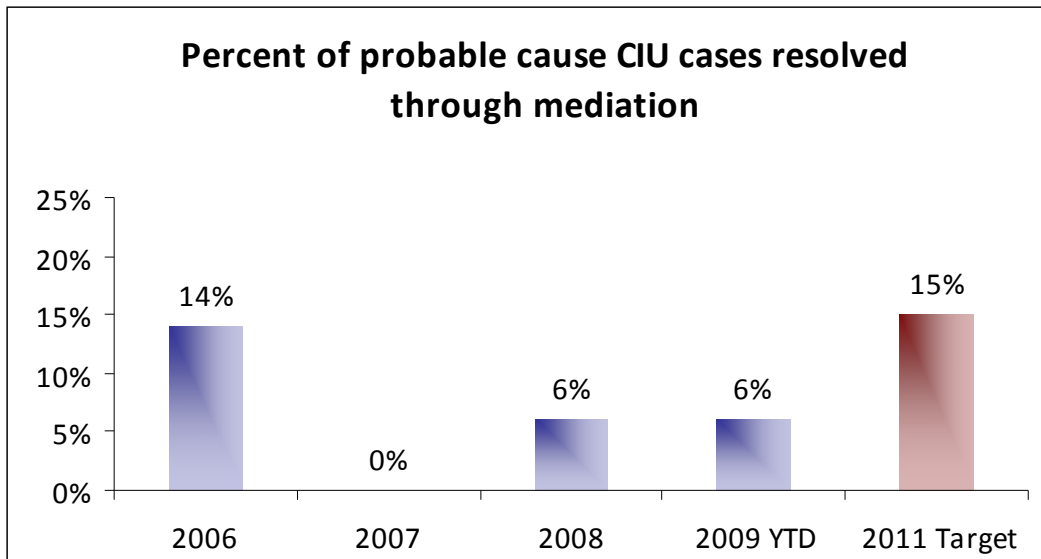
### Why is this measure important?

This measure complements the previous measures, the number of new complaints and an average time to complete a filed complaint. If the speed of investigation does not keep pace with the incoming flow of new complaints, the number of open cases (backlog) will increase. As the backlog increases, complainants and respondents will wait for an inordinate time period to learn of the resolution of the issue at hand. This is not a proper situation for either party to endure. Additionally, large backlogs and the resulting extended period of time to publish a final determination may pose legal jeopardy for MDCR, as well as either and/or both parties to the dispute.

### What will it take to achieve the targets?

Our goal is to eliminate the backlog of cases older than 24 months by mid-year 2010. We had hoped to eliminate the back-log by year-end 2009. Due to various obstacles, we were not successful in this objective. Those obstacles included; 1) slower than expected implementation of Practice Manager; 2) longer than expected learning curve for investigators; and 3) loss of two out three contract investigators.

By reducing the complaint investigation cycle time, the level of the backlog (average age of open cases) will also decrease average charge resolution time and the average age of the pending charge backlog. We must ensure that we manage cycle time reductions to keep pace with any increase in new incoming complaints.



### **Why is this measure important?**

This measure is important because mediation is the most efficient means to bring a complaint to closure. Mediation is an attempt to settle a charge of discrimination prior to the Director issuing a final determination. Mediation is an efficient process that saves time and money. Successful mediation avoids a time consuming investigation and achieves a prompt resolution of the charge. It may also reduce the level of animosity and acrimony between the parties; this may reduce future conflict between them. Additionally, by increasing the numbers of cases resolved through mediation as a voluntary alternative to a full investigation, the Department can focus more resources into reducing the backlog of cases. If mediation is unsuccessful, the charge undergoes formal investigation.

Conciliation is similar to mediation; however, it occurs *after* a formal investigation is completed, and the Director has issued a probable cause determination. Conciliation efforts are mandated by the Minneapolis Civil Rights Ordinance, section 141.50 (f).

### **What will it take to achieve the targets?**

It will take continued improvement of mediation and conciliation skill sets (e.g. persuasion, conflict resolution) for the investigative staff, including training in drafting settlement agreements. These skills are necessary to: persuade the parties to engage in the mediation process, and actually assist them in identifying and agreeing to a mutually beneficial result.

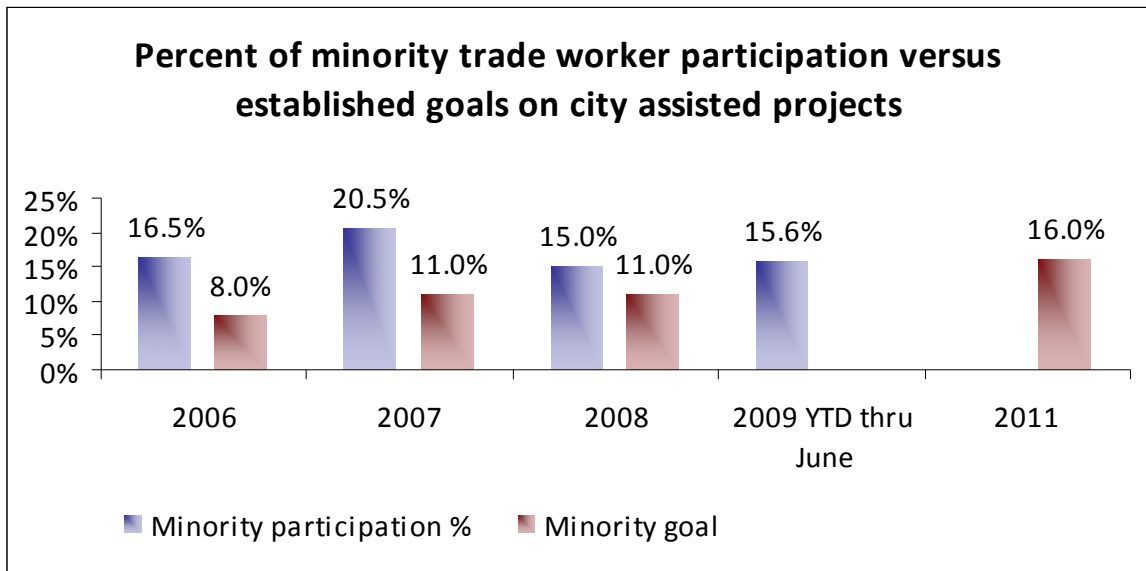
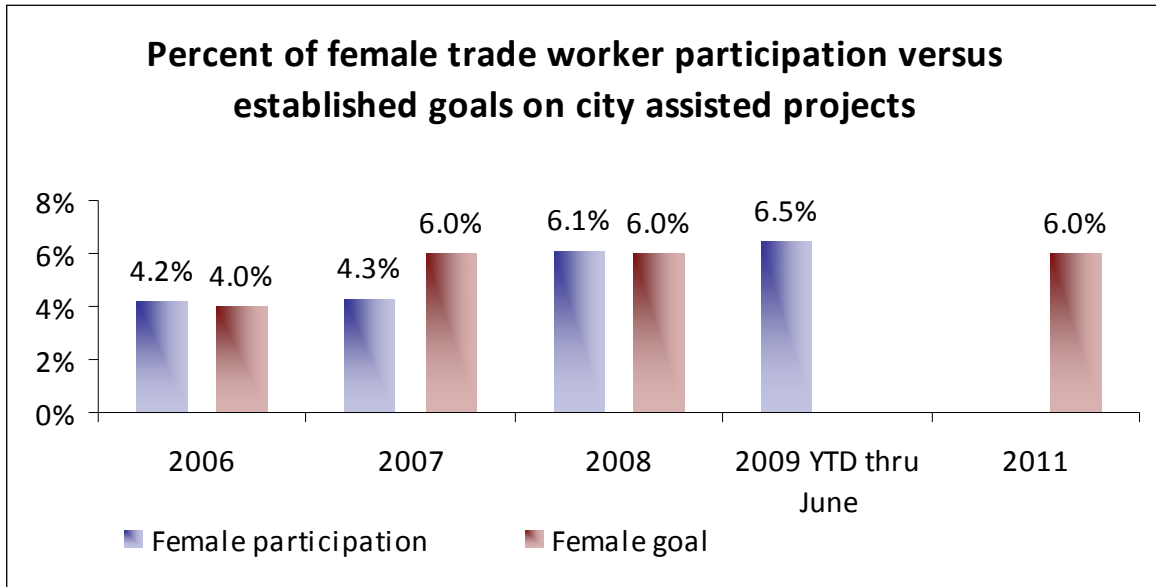
To increase the capacity to conduct mediation/conciliation and to improve the likelihood of successful mediations/conciliations. We have developed a pool of lawyers/mediators who will provide mediation/conciliation services, Pro Bono. This effort has increased the capacity to provide timely and effective services, and should result in an increased settlement rate (and reduction in the number of total complaints that are investigated).

## **Contract Compliance Process**

### Prior to Bidding

1. Originating department requests review of compliance requirements prior to drafting bid specifications and call for bids.
  - a) Provide Civil Rights with a project descriptions and all funding projects
2. Civil Rights coordinates languages to be placed in bid specifications with City Attorney Office and Purchasing Department.
  - a) Civil Rights determines compliance requirements relative to employment, DBE, SUBP and Davis Bacon and responds with language for bid specifications and sub recipient agreements as necessary.
  - b) Civil Rights coordinates agreement with other compliance jurisdictions, detailing responsibilities and reporting goals.
3. Civil Rights attends pre-bid meeting (s) to express contract compliance requirements (in partnership with other jurisdictions as appropriate).
4. Project Bid Out
5. Desired contractor identified by originating department
6. Civil Rights notified (Request for approval/Notification form)
7. Civil Rights conducts pre-award review
  - a) SUBP participation/Good Faith (as applicable)
  - b) Affirmative Action Plan (Prime/Developer)
  - c) Pre-construction book (employment participation plan)
8. Civil Rights approves contract/contractor
9. City Council approval
10. Civil Rights or other jurisdiction monitors results
  1. Sub contractor affirmative actions plans
  2. SUBP verifications (if applicable)
  3. Workforce participation of minority and woman trade workers
  4. Davis Bacon (if applicable)
11. Civil Rights reports results to City Council and Mayor

## Contract Compliance Unit (CCU)



### Contract Compliance Trends

On the positive side, during these tough economic times, our minority skilled and unskilled employment goals have been met and/or exceeded. We continue to work with contractors and the unions to meet the female employment goal.

A wide variety of projects produce the overall participation results. Projects like Wellstone Franklin Gateway, Coloplast, and Steward Co-Op & Deli provide for increased participation.

During 2nd quarter, 2009, there were 15 projects that were deemed as not meeting the employment goals by 2% or more and staff is working diligently to hold contractors in compliance when they fail to meet these employment goals.

However, on the negative side, the CCU has seen an increasing trend in wage underpayments on several projects. Wage underpayment investigations are very time consuming and require detailed analysis and communication with various parties. We are currently investigating approximately \$90,000 in wage underpayments. Many of the individuals who may be underpaid are minorities.

### **Why is this measure important?**

The City has adopted a standard of “*One Minneapolis*.” As we move toward closing economic gaps and focus on a high quality of life for all citizens, we must focus on economic opportunities. Our contract compliance activities are geared to ensure that people of color and women receive fair and equal opportunities to pursue and participate in employment activity generated or assisted by city resources. Participation should reasonably mirror availability. By monitoring these participation trends decisions can be made relative to whether more outreach, training or enforcement are required by the City. We will consider the modification of all the measurements goals for 2010, after completion of our diversity study.

### **What will it take to achieve the targets?**

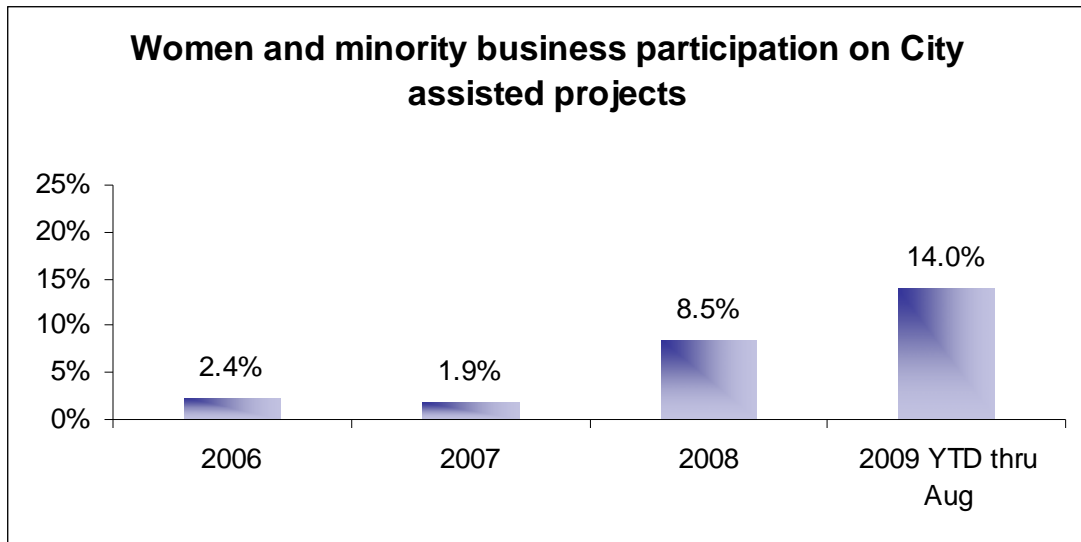
**1. Improved Effectiveness:** The successful implementation of the LCPtracker online reporting system (on all projects that started after April 1, 2009) has enabled the Department to utilize its resources more productively, accurately, and efficiently, and to hold contractors more accountable for the multiple requirements that the Department enforces. All contractors with employment hours are required to submit certified payroll into the system on a monthly basis. Rather than staff manually poring over hard copy payroll records, the system automatically checks the payroll for prevailing wage, overtime, and apprenticeship compliance, and it alerts CCU staff to potential problems as they arise. The electronic conversion has also taken the place of the hard copy monthly employment reports (CC-57s) formerly submitted to track compliance with the employment goals; rather than manually entering data from the forms into the old internal database, department staff are able to track and run reports on contractors and employees by ethnicity, trade, ward and zip code, allowing for real time review of targeted activity.

## What will it take.. – continued

B2Gnow, the counterpart to LCPtracker, is in the early stages of application. Once fully operational, the system will enable the Department to efficiently monitor SUBP participation and payments made by the city and general contractors. Another improvement relates to the storage of affirmative action plans, which are required from all contractors and suppliers with contracts of over \$50,000. Since mid-2008 all approved plans and related documentation are scanned and stored on the hard drive, enabling staff to quickly review stored plans from their own desks rather than manually accessing them from remote file cabinets. In addition to saving substantial staff time and improving the quality and thoroughness of the compliance duties, these improvements have substantially increased contractor accountability.

- 2. *Develop partnerships*** that contribute to the successful completion of our task and missions. Relationships with prime contractors and sources which provide women and minority labor help all meet the objectives. We continue to work with Urban League LEAP program, National Association of Minority contractors (NAMC) and labor unions to insure that there are minority and female employees are available. We recently have established partnerships with Urban Homeworks, Habitat for Humanity, and GMHC regarding SUBP, Section 3 and employment on Neighborhood Stabilization Projects (NSP). The Department continues to enhance relationships with CPED, Purchasing, regulatory services and various City Departments.
- 3. *Develop programming*** and support activities that increase the availability and capacity of minority and women labor sources, particularly in the “skilled” categories. One major adjustment that has been made that has contributed to the city maintaining high employment participation on projects is the pre-award review. The CCU does not recommend for award any projects until the SUBP and employment information have been submitted and verified by the general contractor.

# Small and Underutilized Business Participation



The participation of businesses owned by women and minority citizens on city assisted construction projects has increased. To date, results for 2009 are at 14%. We will not have a complete measure of where participation should be until our disparity study is completed. Contractors have shown an improved commitment to meeting the goals. It is important to note that unlike the workforce participation goals, the SUBP goals are established on a project by project basis. The number of certified small and underutilized businesses has also increased from 625 in 2007 to a current total of 929. Thirty-eight (38%) of those businesses are in construction while forty-five (45%) provide services.

## **Why is this measure important?**

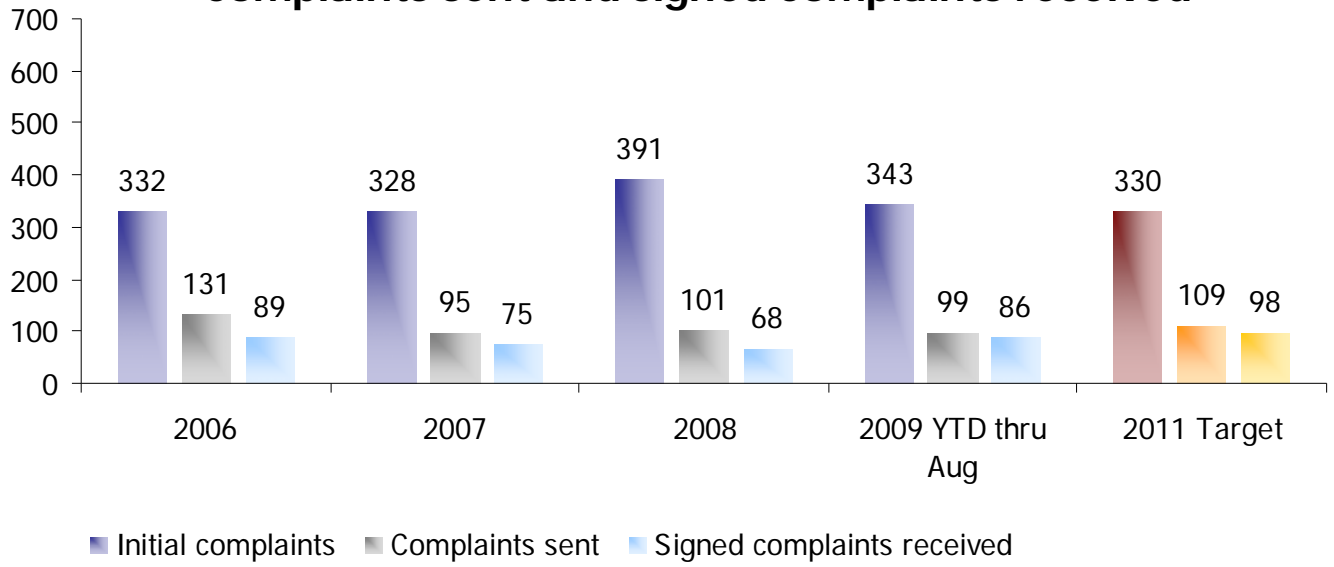
It is extremely important to the economic strength and stability of Minneapolis that small and underutilized businesses have fair and equal opportunities to pursue and participate in business activity generated or supported by city financial resources. By measuring the yearly participation of those protected classes, we can make determinations on the directions we need to take to meet objectives. After completion of our disparity study, we will have a more definitive account of availability and program effectiveness.

## CRA INVESTIGATIVE PROCESS

The CRA investigative process involves eight steps.

1. Initial Complaint By Civilian  
Contact by phone, mail, walk-in, or online complaint
2. Interview  
Preliminary investigation – gathering of initial evidence and statements
3. Complaint sent for signature  
Initial evidence supports drafting of a complaint for the civilians signature
4. Complaint returned signed  
If signed complaint not returned, no further CRA action
5. Investigation  
Additional information gathering, complainant, officer, and witness statements taken. Summary and recommendation. Review and set for Panel Hearing.
6. Hearing held  
Three member panel. Officer and Complainant requested to attend.
7. Hearing Decision  
Findings of Fact and Conclusions – sustain, not sustain, or dismiss. Sustained complaints sent to the Chief for a disciplinary decision.
8. Chief's Discipline Decision
  1. Discipline
  2. No Discipline
  3. Reconsideration

## Civilian Review Authority (CRA) initial complaints, complaints sent and signed complaints received



The 2011 target for Initial Complaints is based on the mean of the 2006 and 2007 numbers; Complaints Sent is based on 33% of the projected 2011 initial complaint total; Signed Complaints Received is based on 90% of the projected 2011 Complaints Sent total.

### Why is this measure important?

Initial Complaints indicate that citizens are seeking a government entity external of the MPD with the authority to address allegations of police misconduct.

Complaints Sent indicates that the citizen's reported police misconduct allegation raised concerns that warranted the drafting of a complaint. Complaints Sent may include Initial Complaints from previous months. Complaints Received indicates that the citizen is willing to continue through the CRA process. Complaints Received may include complaints sent in prior months. The variety of the complaint, itself, may possibly be measured by the ratio of the number of Initial Complaints to the number of signed complaints received.

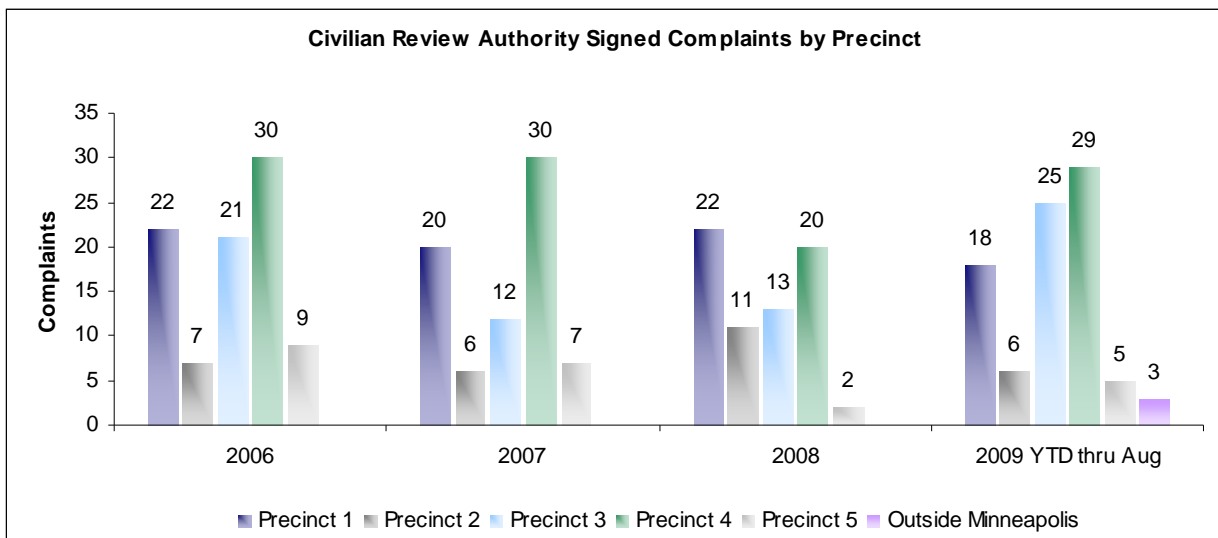
A projected target is difficult to calculate for this measure because the measure depends on the civilians' confidence in the investigative agency, the corrective influence of the Chief's decisions, and officers' beliefs that they will be held accountable for their actions. The above projection assumes that citizens will have confidence in the agency, the corrective nature of CRA complaints would be realized, actions will be taken to correct misconduct issues, and problem officers will realize that they are being held accountable for their actions.

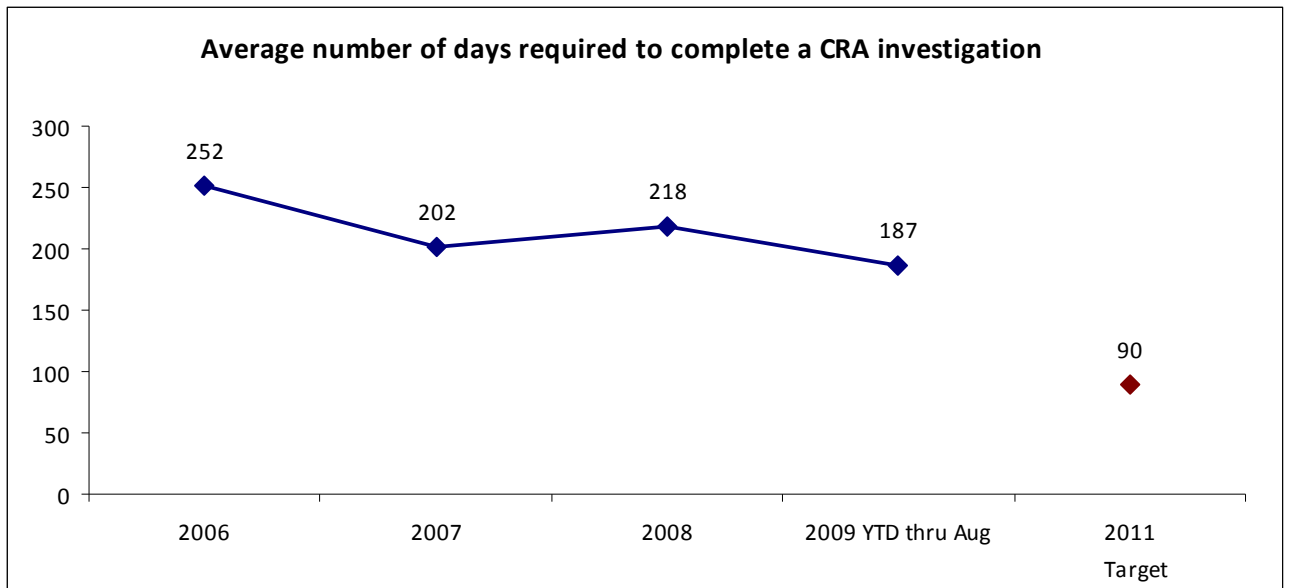
## What will it take to achieve the targets?

In addition to the above assumptions that would affect the amount of civilian contact with the agency, Initial Complaints and Complaints Sent are also dependent on additional variables beyond CRA control, such as, the number of police interactions, policing techniques and practices, rendering of police discipline, and actual levels of crime.

In order for the CRA to achieve its targets, the CRA will work to increase citizen awareness of the CRA and citizens' confidence that the CRA process will deliver meaningful results. In addition, the CRA will develop ways to reduce the length of the CRA process so that complaints needing quick attention will be sent the MPD faster. The CRA will focus on the following over the next six months:

- The CRA will use intake information to focus its community education efforts to inform the public of their rights.
- The CRA will use Complaints Sent information to notify the MPD of recent trends that are being reported to the CRA.
- Continue to explain to citizens that CRA action does not begin until the CRA has received a signed complaint.
- The CRA will focus on achieving a 100% Complaints Sent return rate by placing follow-up calls to citizens who have not returned their complaints after 14 days.
- Develop a method and implement a move from first in/first out processing to priority-based processing
- Report repeat officers to the MPD
  - send reports of officers who have received three or more complaints involving the same allegation within a twelve month period. This report will be in addition to the Notice of complaints that the MPD currently receives.
- Continue to advocate for discipline on CRA complaints
  - For those complaints that the MPD believes discipline is not warranted, the CRA will continue to advocate for the use of the Chief's reconsideration option.





The increase in the number of Initial Complaints may require the Department to adjust the measure for average number of days required to complete a CRA investigation as a productivity measure. The CRA has always operated outside the ordinance timeframes. The length of time for the completion of the CRA process has always been a civilian and officer criticism. In light of these concerns and the MPD's recent declination to discipline on aging complaints, the CRA will need to explore ways to reduce the investigative timeline within its current investigative capacity.

### **Why is this measure important?**

Tracking this measure forces the CRA to continue to evaluate the CRA process to decrease the investigative timelines to provide citizens and officers with faster resolutions to their complaints, support ordinance changes if warranted and requests for additional resources.

The CRA ordinance requires that complaint investigations be completed within 60 days, unless a 30-day extension is granted. Citizens and police officers often express concerns that their cases take too long to process. Additionally, long CRA investigative timelines shorten the duration of the reckoning periods attached to the policy violation contained in the CRA sustained complaints. The shortening of the reckoning period limits the ability of the CRA sustained complaints to be used as enhancement tools on future discipline.

Because the MPD assigns the discipline category to the policy violation contained in the CRA sustained complaint, it is extremely important that the CRA complete investigations as quickly and thoroughly as possible to increase the sustained complaints' ability to serve as corrective tools. And, in light of the MPD's recent use of the reckoning period to bar initial discipline on a CRA complaint, it is even more critical that investigations are completed as quickly and thoroughly as possible to receive initial discipline.

Under the MPD's disciplinary decision model, categories range from one year, three years, five years, and course of employment. The reckoning period runs from the day of the incident. The reckoning period defines the time in which a previous infraction may be considered in a present disciplinary action, thus enhancing a present infraction. When a sustained CRA allegation is sent to the Chief and falls within a reckoning period the complaint may be used for initial discipline and as an enhancement on discipline on a future misconduct complaint. If the complaint falls outside of the reckoning period its affect as an enhancement or a potential progressive discipline tool is minimal, if at all. However, under the reckoning period definition, the complaint is still good for discipline on the merits of the complaint, even though, the reckoning period has past.

Since the last Results meeting in September 2008, the average number of investigative days have decreased by 18 days. This increase was due to the CRA's focused efforts to complete all of the 2006 and the majority of the 2007 complaints. With the completion of those aging cases, the CRA anticipates that the average number of days in investigation will decrease by the end of the year.

### **What will it take to achieve the targets?**

In order for the CRA to achieve the ordinance requirement, the CRA will continue to streamline its processes to eliminate inefficiencies by pursuing the following activities:

- Advocate for an additional experienced full-time investigator.
  - Continue to limit the number of days that a complaint investigation is delayed to 45 days for those complaints where the complainant has demonstrated a lack of cooperation.
  - Continue to assertively enforce the officer's duty to comply with CRA investigations
  - Continue to streamline the entire CRA process by establishing stricter controls on mediation scheduling, hearing scheduling, and board determinations.
  - Develop and implement a priority-based processing plan for a six-month trial basis. The CRA hopes that the priority-based process will allow the CRA to provide the greatest amount of CRA services to the public by focusing investigative resources on those complaints that are higher on the priority list. For those complaints lower on the priority list, the CRA will need to develop a method to handle those complaints responsibly. If the CRA moves to a priority-based process, the CRA will need to track productivity based on the priority level, where the higher level complaints have faster investigative timeframes. Factors to be considered for priority-based processing are the severity of the alleged misconduct, repeat officer, impact of the misconduct, potential for corrective action, etc.
- While the above process will provide faster service to some officers and civilians, the CRA may continue to experience challenges in processing complaints in general due to the number of initial complaints received and the capacity of the CRA's investigative resources.

## Percent of signed CRA complaints successfully mediated



### Why is this measure important?

This measure is important because as the number of mediations increase, the City has additional opportunities to promote police and community understanding, goodwill and quicker resolutions of complaints. More importantly, this measure reflects a more efficient use of City resources.

Fourteen mediations have been held so far this year, eight were successful, representing fifty-seven percent (57%). The eight (8) successful mediations represents nine percent (9%) of 2009 complaints (86).

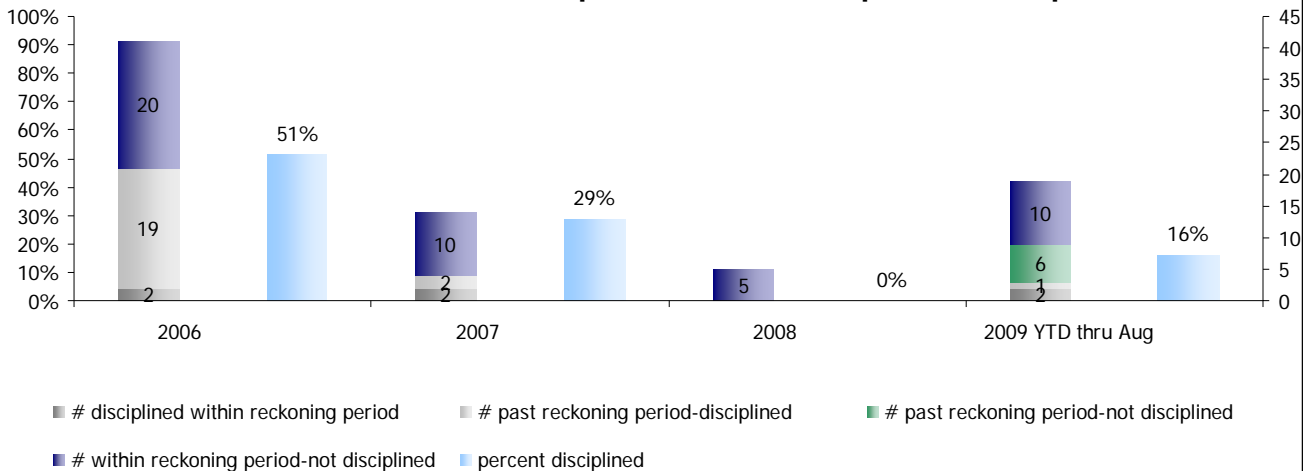
Although, mediation numbers are not near the target, mediation is still a valuable tool for resolving complaints.

### What will it take to achieve the targets?

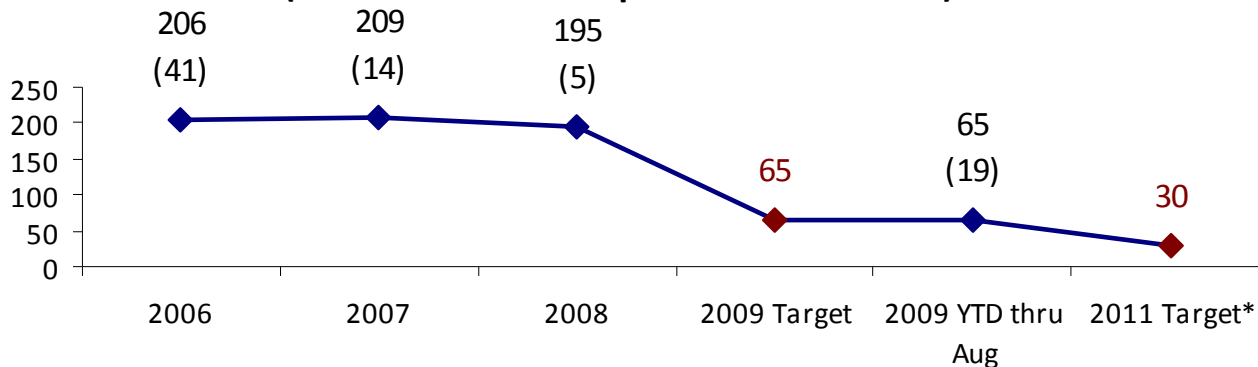
To accomplish the targets for CRA mediation, the CRA will need to:

- Continue to utilize and maintain a pool of experienced mediators
- Continue to prepare citizens for mediation during the initial intake conversation and through the use of its mediation brochures.
- Conduct a self-evaluation of the mediation program – The CRA will begin evaluating the officer, citizen, and mediator's satisfaction with the mediation program. The CRA will use the feedback to determine additional ways to improve the success of the program
- Explore the costs and benefits of contracting mediation services.

### Status of disciplinary action for sustained complaints and Percent of sustained complaints where discipline was imposed

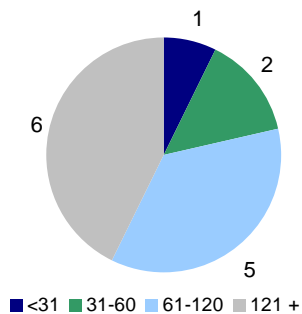


### Average number of days to issue disciplinary action (total sustained complaints sent to chief)

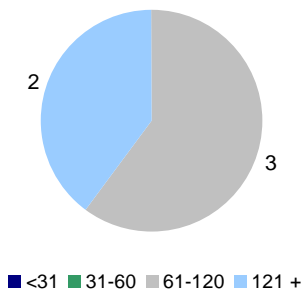


\*The CRA ordinance requires the MPD administration to make a disciplinary decision within 30 days, unless they request a 30-day extension or a reconsideration of the hearing panel's sustained finding. M.C.O § 172.130 (b).

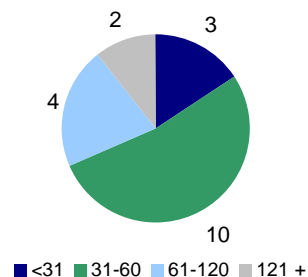
Number of days to issue disciplinary action 2007



Number of days to issue disciplinary action 2008



Number of days to issue disciplinary action 2009 YTD thru Aug



## Why are these measures important?

These measures monitor key issues (timeliness and actions taken) that influence the collective confidence among Police leadership, CRA hearing panels and the public in the process of investigating complaints against Minneapolis Police Department officers. Lastly, the measures address the ability to publicly communicate CRA determinations (only in cases where discipline is issued) in a timely manner.

### Discipline

Since the last Results Minneapolis, the Chief's discipline rate has improved. Last year, the chief's discipline rate was zero.

From Jan-Aug '09, the CRA received 19 disciplinary decisions from the Chief. Three of those decisions contained disciplinary actions (letter of reprimand, oral reprimand, A level), representing 16 percent of the disciplinary letters. Of the 19 complaints, the Chief indicated that six of the complaints warranted discipline, but through the application of the reckoning period discipline was declined.

The CRA does not understand this rationale because, as discussed earlier, the MPD Complaint Process Manual defines the reckoning period as the period of time in which a *previous* infraction may be considered in a present disciplinary action. Additionally, this is a departure from the MPD's past discipline practice. In 2006, approximately 19 of the 21 complaints disciplined on were beyond the reckoning period.

All CRA sustained complaints sent to the Chief for a disciplinary decision are present actions. The CRA complaints may be disciplined for the present violations contained in the complaints; however, the complaints could not be used to enhance a future disciplinary action.

Lastly, the Chief has not used the reconsideration option for those complaints that the Chief believed did not warrant discipline because of insufficient evidence or a disagreement with the findings of fact and conclusion. The Reconsideration option would have allowed the Chief to provide the legal or factual basis for the no discipline decision, especially in those cases where the Chief does not believe the evidence supports discipline. The reconsideration option would have provided an opportunity for the CRA and MPD to achieve closer alignment between the CRA findings and the Chief's disciplinary actions.

### Timeliness

▪ Since the last Results Minneapolis, the Chief has significantly reduced the number of days to make a disciplinary decision. At the end of August, the number of days to make a disciplinary decision was 65 days.

## What will it take to achieve the targets?

The target for the discipline on CRA complaints is 75%, allowing for those complaints that the CRA and the MPD will not agree on, even after a reconsideration. To move in that direction the CRA will:

- continue to train its investigators and board members on MPD policy and procedures, and relevant case law;
- encourage the MPD to use the reconsideration option;
- continue to attend MPD training and request MPD training materials;
- address the status of disciplinary cases during PACC (Police Accountability Coordinating Committee) meeting;
- encourage Police leadership to deliver disciplinary decisions within the thirty-day requirement, especially for those complaints;
- Seek an ordinance change that would require the Chief to meet with the board before notification is sent to the officers for those complaints the Chief believes does not warrant discipline; and,
- maintain a full and operable board.

In addition to the above actions, there are six ways that the CRA and MPD could resolve the concerns related to the reckoning period, discipline, and the length of the CRA process

1. Change the ordinance timeframes to reduce the officers and civilians expectations; however, the change would not resolve the officers and civilians desires for quicker resolutions. More importantly, it would not resolve the MPD use of the reckoning period to bar discipline.
2. Modify the reckoning periods to fit the CRA and MPD IAU real-time process times. The reckoning period for the lowest level of the corrective action runs with the one-year filing timeline and the IAU does not have a bar to when a complaint can be filed, this sets up an immediate conflict.
3. Change the reckoning periods used in 1995 under the past MPD discipline matrix, particularly the reckoning period “figured from the date the offense was first brought to the attention of the supervisor/administration.” (1995 Draft MPD P/PI and Disciplinary Range System).
4. Add a CRA investigator to reduce the investigative timelines and maintain the current process. This will allow complaints to be processed faster.
5. Limit the use of the reckoning period to the previous complaints as done in the past.
6. Develop and implement an priority-based investigation process that eliminates weak complaints even earlier in the process, while maintaining the integrity and the ideals of civilian oversight, and focus mainly on those complaints that have potential for corrective action. The development of a process is currently being discussed by staff.