Milwaukee Fire and Police Commission

Independent Audit of Milwaukee Police Crime Statistics and Reporting Procedure

December 2012

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I. BACKGROUND

Beginning in May the accuracy of the Milwaukee Police Department's crime statistics was called into question in a very high profile manner by local media. Between May and September, over 20 articles were published as part of a watchdog series by the Journal Sentinel accusing the agency of producing statistics which were intentionally manipulated for the purposes of creating a crime rate that was lower than it really was. The newspaper had conducted an investigation which revealed since 2009 over 500 aggravated assault reports were misclassified as simple assaults. This resulted in a lower crime rate being reported rather than a greater crime rate had the reports been properly classified. The articles also repeatedly stated there were over "800 cases since 2009 that followed the same pattern but couldn't be verified with available public records".

After these allegations were leveled the Milwaukee Police Department conducted its own internal audit of assault reports and revealed that over 5300 cases had been misclassified since 2006. The review also revealed that almost 1200 minor assaults were over-reported as aggravated assaults during that time. It should be noted that well before the news articles were published and before its audit, the Department had identified problems with its crime statistics and had been working to correct them. There is ample evidence documenting this due diligence including in particular a request for an FBI audit from Chief Edward A. Flynn himself in 2010.

As a result of its internal review the Department asserted the problematic crime stats were due to 1) technical and functional problems with the Tiburon records management system 2) incorrect report writing and processing by police and records personnel and 3) a lack of training in the National Incident Based Reporting System (NIBRS). NIBRS is the standard by which law enforcement agencies report their crime statistics to the FBI. While the police department acknowledged the crime statistics contained inaccuracies, it denied that intentional efforts had been undertaken to alter them.

The Journal Sentinel articles continued to allege nefarious activities had caused the erroneous statistics despite the findings of the Department's internal review which was presented publicly to the Public Safety Committee on June 21, 2012. The Department wrote a report detailing its finding, published a video on its website depicting screen shots where the errors had occurred with RMS and clearly acknowledged mistakes had occurred (see video at http://www.milwaukeepolicenews.com/chief-flynn-message-to-community-officers-on-crime-stats/?ajax=1).

The Fire and Police Commission, Milwaukee Public Safety Committee and the Common Council subsequently evaluated and discussed the allegations as well as the police department's efforts that had been undertaken in response. These discussions included considering whether an external independent audit was called for. In light of the fact an internal audit had already been conducted, the Fire and Police Commission determined in the best interest of fiscal responsibility it would be prudent to utilize an outside independent expert to conduct an initial review as opposed to a full scope audit. The results of such a review, described herein, would be assessed as part of the decision making process regarding whether a full audit would be needed.

An initial review as such is best conducted by completing a type of audit known as an attestation engagement. As defined by Generally Acceptable Government Auditing Standards (GAGAS), the official standards by which government audits are conducted, attestation engagements of the examination type "consist of obtaining sufficient, appropriate evidence to express an opinion on whether the subject matter is based on (or in conformity with) the criteria in all material respects or the assertion is presented (or fairly stated), in all material respects, based on the criteria."

II. STATEMENT OF OBJECTIVITY & COMPLIANCE WITH GAGAS

This audit was conducted by PRI Management Group, an independent public safety consulting and auditing firm that works free of any and all personal, external and organizational impairments to independence, third-party personal, business or financial affiliations that would prevent or impair objectivity in our work, and works in accordance with Generally Accepted Government Auditing Standards (GAGAS).

Ed Claughton, President of PRI, served as the auditor in this project and is a Certified Law Enforcement Auditor through the International Law Enforcement Auditors Association. He holds a Master of Criminal Justice degree from Boston University and specializes in audits, training and consulting services in the field of law enforcement information management. He has provided these services to police agencies around the United States and has 17 years of law enforcement experience with a concentration in police records management, technology and criminal investigations.

III. INTRODUCTION

As stated by the Bureau of Justice Statistics there are nearly 18,000 state and local law enforcement agencies in the United States. The Milwaukee Police Department is the 28th largest of these with 2599 employees. It responds to over 200,000 calls for service each year. In 2011 Milwaukee Police wrote 65,595 incident reports, 37,311 arrests, 141,489 citations and 12,525 accidents. All of this activity produces a massive amount of information that must be processed according to the information lifecycle- the core component of records management. In law enforcement, this lifecycle dictates that information must be created, collected, processed, maintained, disseminated and disposed of according to industry best practices, public records law, state records retention schedules, criminal law and FBI reporting standards.

For an agency the size of the Milwaukee Police Department with workload measures this large, compliance with these requirements is a daunting task. Despite these figures the Department only has 20 personnel working in Records Management- a fact important enough to mention this early on in the report. More personnel are needed to efficiently carry out the records management lifecycle.

In 2005 the Department implemented a new enterprise-wide records management system and simultaneously began reporting its crime statistics according to the National Incident Based Reporting System (NIBRS) instead of the traditional Uniform Crime Reporting (UCR) system. The Department was ill prepared for the formidable task of managing the substantial change that came with these simultaneously occurring projects and as such, problems occurred from day one. Having said this, due to a misleading message that was sent to the Department in a 2007 audit which stated its crime stats were accurate, it comes as no surprise that the current inaccuracies went undiscovered until several years later.

The overall manner in which police reports are written, reviewed, processed and stored is a relatively standard process in law enforcement. Upon a police report being written by an officer, the report is submitted to a police supervisor for review and correction if necessary. If errors are found, the supervisor sends the report back to the officer to correct the errors (which were found) and the officer resubmits the report for approval. Once approved by the supervisor the report is then submitted to the police records unit for a second level of review where it can potentially be sent back again for other corrections. At this stage, the depth of the review can vary depending on the agency's protocol. Some agency's police records personnel are required to only check reports to ensure the classification (type of crime) is correct while others will check for spelling, grammar, missing information *and* for the proper classification and coding. The Milwaukee Police Department's Records Management unit has a robust quality control process in place which encompasses checking reports for all of these issues. It has not always been this way.

It should be noted the depth of the review conducted at both of these levels can be a subjective process affected by various factors including how busy police supervisors are according to present call volume, the diligence of the individual reviewing the report when it comes to ensuring the absence of mistakes and how well they have been trained in what to look for, particularly in NIBRS standards.

While it is commonly thought these 2 levels of review are the only stages a police report goes through, they are actually part of a much larger process involving a number of different parties both within and outside the agency. This makes any intentional effort to systematically manipulate crime statistics (which are based on individual police reports) very unlikely. The process inherently involves checks and balances which by their design would make inconsistencies in the classification of police reports quite obvious if one knows what to look for.

For example, when a police report is written it is unknown, unless an offender is immediately caught by responding officers, whether or not an arrest will occur in the future based upon subsequent follow-up investigation. This is an important distinction considering arrests are often made weeks and sometimes months after a crime is reported. When a subsequent arrest is made the original incident report (which has been reviewed and approved by the Department) along with the arrest report is submitted to a prosecutor for review. Given this fact, a police report which has been intentionally reclassified to a lesser crime at some point during or after it has been reviewed and approved would equate to assuming that the reviewing prosecutor wouldn't notice a discrepancy between what the police report says, what the correct crime classification (title) is, what the victim states and what the offender was charged with by police. Furthermore, there is no way of knowing which cases are going to lead to an arrest and subsequent furtherance of the police report into the judicial system which makes the deliberate misclassification of reports an extremely risky and highly unlikely undertaking.

In addition, prior to arriving at the judicial phase a police report undergoes review by other entities including a supervisor, a records specialist and of most importance, the victim who may or may not request a copy of the report. Knowing these factors exist raises serious doubt about the feasibility of intentionally reclassifying a report to a lesser crime. There are many working parts involved in the production of a crime stat.

Falsifying reports would be akin to a physician who after assessing a patient writes in the charts that the patient had complained of chest pains and displayed symptoms indicative of heart disease, had test results that confirmed the patient suffered a heart attack and then intentionally misdiagnoses the patient with gastritis to make him think everything is going to be fine and expect the nurses, insurance company, lab technicians and doctor's office staff to not notice something wrong.

While it is understood that misreporting crime stats may be beneficial by creating the allusion of less crime in a particular jurisdiction, one must consider the substantial risk of doing so. Such an effort would put the agency and the employees at significant risk including criminal charges. The intentional manipulation of crime stats would require changing a police report to include information which is contrary to the truth or what was written by the reporting officer. Doing so is a crime if done for this purpose. Such risk comes with knowing that if caught the repercussions would be catastrophic to the individual personally, to their careers, to their livelihood and to the department. Furthermore, to intentionally change a field on a report for the purposes of lowering a crime rate in a major metropolitan city would require doing so by the hundreds and expect such activity to not be discovered or, have approval to do so. Approval however would require aligning the multiple people involved in the crime reporting process including civilian records personnel, supervisors and command staff to oblige to committing such an illegal act by the hundreds and expect to get away with it knowing that at any given moment a crime victim or a member of the media could obtain copies of the reports and expose the conspiracy.

Nonetheless, this possibility exists and it was considered throughout this audit as efforts were conducted to identify whether such activity had been occurring at the Milwaukee Police Department. Our assessment involved conducting interviews of personnel and reviewing police reports, data, workflows and the entire business process relative to the production of crime statistics.

Having said this, the question remains are there other methods by which crime statistics can be intentionally skewed using a different and not so obvious approach and the answer is yes. One way is for officers to classify reports incorrectly at the moment they are written, possibly at the direction of a supervisor or on one's own volition by selecting a lesser crime classification and writing a corresponding report narrative which skews the facts of the incident.

Such an effort would again have to be done on a wide scale to bear out any statistical difference in the crime rate of a major metropolitan city. This approach is also an extremely risky undertaking considering again the fact that police reports are generally public record and are often read by victims themselves who most likely would make it known that their report is wrong. Furthermore, as previously described officers don't know which cases may result in a subsequent arrest and therefore a review of the report by a prosecutor who would notice discrepancies between what the report narrative states and what the victim says happened.

Another method, a possibility which exists due to the substandard structure of the Tiburon RMS is to change the NIBRS crime code within police reports such that the system produces skewed NIBRS statistics. It was this type of activity the newspaper alleged was occurring, primarily in the assault category. The articles inferred the police department had intentionally changed hundreds of aggravated assaults to simple assaults in order to artificially lower the violent crime rate in Milwaukee. While the codes had been changed in many cases, they were not changed for the purposes of impacting Milwaukee crime statistics but rather to overcome an error message generated by RMS.

These manual changes combined with errors in the system's code table and incorrect classifications made by reporting officers are the reasons for the inaccuracies. A detailed description of how NIBRS crime coding works is included herein.

The National Incident Based Reporting System (NIBRS)

The National Incident Based Reporting System is at its core designed to measure crime rates on a national level. The FBI strongly discourages utilizing the data for the purposes of comparing one jurisdiction to the next due to the many variables affecting crime rates. Furthermore, the crime definitions in NIBRS were developed to standardize the elements of a crime from one state to the next to allow for valid statistical evaluation and they therefore differ from many state statute definitions.
For example, NIBRS utilizes the term "assault" for incidents which include both the threat of harm to another person or the physical attack of another person. Most states including Wisconsin call a physical attack on another person a "battery". Please note the following NIBRS definitions:

Aggravated Assault

"An unlawful attack by one person upon another wherein the offender uses a weapon or displays it in a threatening manner, or the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness."

This usually includes offenses such as pointing and presenting a firearm, brandishing a firearm, etc. A severe laceration is one that should receive medical attention. A loss of consciousness must be the direct result of force inflicted on the victim by the offender.

For the purposes of the above definition, a weapon is a commonly known weapon (a gun, knife, club, etc.) or any other item which, although not usually thought of as a weapon, becomes one when used in a manner that could cause the types of severe bodily injury described in the above definition (note: for NIBRS purposes, mace and pepper spray are considered to be weapons).

Simple Assault

An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

What follows is a report that summarizes the actions taken in, and findings of, this audit which was undertaken to provide the City of Milwaukee and its citizens an unbiased review of the Milwaukee Police Department's crime reporting processes and a determination of what caused its inaccurate crime statistics. It has been the foremost interest of the Milwaukee Fire and Police Commission and the auditor to report the facts, whatever they may be. The evidence obtained in this audit substantiates its findings.

It is important that those who review this report do so thoroughly. While the "Findings and Conclusions" section of an audit report are always of most interest, significant information is provided throughout to address the valid concerns that have been raised in this matter. The community's trust in its police department is a crucial element in the collaborative efforts that are required to combat crime. This report presents the audit's findings as is without political, fiscal or personal influence from anyone.

IV. AUDIT OBJECTIVES

A. The first objective of this audit was to obtain sufficient and appropriate evidence to provide an expert opinion regarding the validity of the police department's internal audit and its findings which focused on the assault category. It is *not* an objective of this audit to determine Milwaukee crime rates and increases or decreases thereof.

B. The second objective is to assess the police department's police reporting and records management processes, protocols and records management system (RMS), and provide an expert opinion regarding whether these elements have affected the Department's compliance with NIBRS assault reporting standards and if so, how.

C. The third objective is to provide an expert opinion regarding whether any intentional efforts were undertaken by the police department and its personnel to manipulate or misrepresent crime statistical information.

V. SCOPE AND METHODOLOGIES

The scope of this audit encompassed a thorough review of Milwaukee Police policy, protocol, data, and procedure including a review of a sampling of police incident reports from 2006-2012. In order to meet the objectives stated above a comprehensive review was conducted not only of police reports and statistics themselves, but also of the processes and systems used to produce them. This 360 degree approach, which enabled the audit to both reveal *and* rule out what has caused the inaccuracies, included analyzing the entire reporting process, employee's knowledge of NIBRS standards, training levels, and the RMS system and its code tables. It is widely known there are errors in the statistics and the focus as such is to determine what caused them.

The auditor was provided unfettered access to the police department's RMS and CAD systems, audit database, policies, personnel, and departmental computer networks. The following activities were conducted in this audit:

- On-site formal standardized interviews of 58 employees representing a cross-section of sworn and civilian personnel from every rank in the Department including officers, detectives, lieutenants, captains, command staff, executive staff and Records Management personnel.
- Review of 3748 incident reports.
- Review of RMS data validated against ARS data.
- Review of Tiburon RMS code tables.
- Interview of Milwaukee County District Attorney.
- Interview of Wisconsin Office of Justice Assistance.
- Review of newspaper articles.
- Review of Milwaukee police policies.
- Review of Milwaukee police internal audit report.
- Review of a 2007 Comptroller audit of the Tiburon RMS project.
- Review of the Milwaukee police data integrity database.
- On-site desk audits with Records Management personnel.
- Review of information workflows and police reporting procedure.
- Review of Wisconsin criminal statutes.
- Review of a 2006 West Virginia Criminal Justice Statistical Analysis Center crime statistic study, "Establishing the Statistical Accuracy of UCR Reports in West Virginia."

The criteria against which the evidence was compared includes the standard NIBRS crime definitions and Wisconsin criminal statutes.

VI. CONCLUSIONS

It has been determined as a result of this audit that while it is correct there were inaccuracies in the crime statistics, the allegations inferring the Milwaukee Police Department had intentionally altered them are baseless.

The Milwaukee Police Department is not hiding crimes, erasing statistics or undertaking other efforts to present a false picture of crime in the city. When someone reports a crime in Milwaukee the fact of the matter is, it gets recorded. While the crime category that the incident gets listed in has clearly been problematic, the record of the crime doesn't disappear.

In simplest terms, even when reports are misclassified they are still on the books. Police departments maintain and report statistics in 2 ways. One set of statistics gets reported to the FBI according to their reporting rules which include standardized definitions and methodologies specific to NIBRS. What the public needs to understand is that *all* of the police reports and their corresponding statistics are still present in the records management system and can be researched at any given time. With the exception of those records which are confidential according to public records law, anyone can request to see this information. This data remains independent of the FBI standards and definitions; definitions which do not coincide with state statutes in many cases. To truly lower crime artificially and successfully conceal the effort, reports of crimes to the police would have to be erased from the multiple places the information simultaneously resides including departmental databases, computer-aided dispatch systems, records management systems, back-up media, phone recordings and mobile computers.

Milwaukee Police Department Assertions

The Milwaukee Police Department has publicly made the following assertions:

- Problems with the Tiburon police records management system (RMS) including incorrect coding and problematic system design were contributing factors to the inaccurate statistics.

- A lack of training in the Tiburon system and in NIBRS standards were contributing factors to the inaccurate crime statistics.

- Incorrect crime coding both on the front-end (when reports are written by officers and reviewed by supervisors) and on the back-end (during the quality control process in the Records Management division) were contributing factors to the inaccurate crime statistics. The errors went "both ways" meaning some crimes were incorrectly upgraded to more serious crimes while others were downgraded.

- No intentional efforts were undertaken by the police department to intentionally alter crime statistics.

Audit Conclusions

With regard to the Department's assertions previously stated, sufficient and appropriate evidence has been obtained and examined in detail to provide a reasonable basis to affirm these factors are in fact the causes of the inaccurate crime statistics.

With regard to the objectives of this audit, sufficient and appropriate evidence has been obtained and examined in detail to provide a reasonable basis to believe the following:

I. The internal audit conducted by the police department is reliable and valid and has identified in sufficient detail the errors in crime coding in the assault category for each year since 2006. The Milwaukee Police Department audit included identifying over 34,000 reports as potentially containing coding errors out of which 11,698 reports were identified as having incongruent data fields, confirming errors may be present. These reports were entered into a database listing the coding errors as well as the updated and corrected code changes made in RMS (see *Milwaukee Police Department Crime Data Accuracy Assessment* dated September 6, 2012 detailing the findings of the internal audit). A statistically valid random sampling of these reports were reviewed and were found to be entered in the database with a degree of acceptable reliability and were verified as having been corrected in RMS. Further discussion follows herein.

II. Errors in the Tiburon system and a then lack of internal controls coupled with deficient NIBRS training and individual performance are what led to the errors. Further discussion follows herein.

Audit Conclusions Continued

III. No efforts were undertaken to intentionally alter or manipulate crime statistics by the Milwaukee Police Department. To the contrary, all of the evidence examined confirms that the errors were caused by what the Department has asserted. Furthermore, the Department has a culture that embraces and promotes professionalism, integrity and accountability through management processes designed to measure performance of individual employees and the organization as a whole.

VII. CONCEPTUAL RECOMMENDATIONS

The success of any records management program is founded upon the agency's ability and willingness to follow certain fundamental concepts in the field of police records. "Records" plays a vital role in law enforcement particularly in the current era of information led policing which focuses on crime statistics and the corresponding efficient deployment of resources. These fundamental concepts are often a point of contention for agencies which are not currently in alignment with them and are not comfortable with change and/or empowerment of civilian employees. Nonetheless, our hands on experience in the successful turnaround of a dysfunctional records unit has proven that forward thinking systematic change utilizing these concepts results in increased performance, efficiency, and information accuracy. These concepts are as follows:

- Problems in "Records" stem from deficiencies in 1) "systems" (processes), and 2) performance (personnel). Ongoing administrative and operational analyses in these two areas always reveal where improvements can and should occur.

- The organizational culture of the agency should be one in which the Records unit is embraced as an equal authority with sworn personnel when it comes to approving reports and the final authority when it comes to identifying what corrections need to be made. It is this entity that is responsible for ensuring the police department is producing accurate, timely and complete information in a manner that represents it professionally.

- Records personnel need to be trained not only in traditional records management protocol but also in UCR as well as the basic areas of criminal law common to policing, i.e. understanding what constitutes a burglary versus a trespassing, a theft versus a robbery, and other common distinctions.

- Once trained, Records personnel should be empowered to act. They should be given the appropriate authority and leeway to take action in correcting reports as well as to determine which officers and supervisors continually produce and approve reports that contain errors.

- The Records unit is the entity charged with ensuring the agency remains in compliance with reporting mandates. Personnel should be expected to thoroughly review all police reports and other documents managed by Records and eliminate and correct errors therein.

- Officers and supervisors should receive annual training in report writing and approval procedure which covers both traditional report writing topics as well as basic NIBRS standards. Accountability for producing reports which are accurate, free of errors and compliant with reporting mandates can then occur.

VIII. AUDIT FINDINGS AND RECOMMENDATIONS

A. Review of Police Incident Reports

1. A total of 3748 reports were reviewed in this audit of which 858 were examined in detail. An initial 400 randomly selected reports in their original form (as written by the officer and approved by the police supervisor) from the police department's targeted audit dataset were reviewed and the correct NIBRS crime code was determined. Because these reports were part of the targeted dataset, most were expected to contain an incorrect crime code.

2. Once the correct NIBRS code was determined, these codes were compared to what was listed in the audit database. The database listed the report number, what the original incorrect NIBRS code was and what it was changed to in RMS after auditing.

3. These initial 400 reports were then researched and reviewed directly in RMS. This validation process was designed to verify that the corrections listed in the database were made correctly in RMS. Of these 400 reports, 269 were correctly identified by departmental auditors as having errors (67.25%) and were corrected accordingly. 26 additional errors were found in which either the departmental auditor noted a correction in the database but did not correct the report in RMS, did not find the error, or made the wrong correction (15 reports were incorrectly changed to a higher classification). This echoes the Department's assertion that the errors go in both directions in the original reports identified in their audit. In other words, the auditors themselves made the same types of mistakes as the reporting officers.

4. A second set of 400 reports were then reviewed which were outside of the Department's audit dataset. This review involved conducting a query in RMS of all simple assaults in each year analyzed in the Department's audit (2006-2012). A random sample from each year was selected, read and the correct NIBRS code was determined. Of these 400 reports, 27 contained an incorrect NIBRS crime code (6.75%).

This means the Department's internal efforts to identify and correct assault reports were successful and the audit was conducted with a reasonable degree of reliability. However, the Wisconsin OJA requires less than a 3 percent error rate. Further efforts to identify misclassifications should occur.

5. There is a clear progression of improvement in the reporting each year. The mistakes decreased substantially over time with a peak improvement in 2009 at which time corrections were made to the statute code table.

6. To determine whether crimes involving aggravated assaults were being hidden altogether as opposed to just being downgraded, a query was conducted of 3 years of data in the "sick/injured person" classification returning 2948 reports. This is the category in which incidents requiring a police report involving people who have been injured in non-criminal incidents would be classified. These types of reports do not get reported to NIBRS. Of these results, further research was conducted utilizing keywords which would describe the actions or injuries involved in shootings and stabbings. 58 reports (1.96%) were identified as being misclassified in this category. Of these, there was no identifiable pattern in terms of district, officer or supervisor. It was determined these reports were classified in this category because either the victim did not cooperate with the police during the investigation and refused to describe what had occurred, stated they did not want a report, or were highly intoxicated and could not describe what happened. Training is needed in this area to ensure officers understand that such incidents must be reported according to NIBRS standards despite the fact they would not rise to the level of prosecution.

   It should be emphasized the narratives in these reports still included a description of what the officer observed and/or could surmise, and some indicated the victim was instructed to file a supplemental report if they changed their mind about describing what happened.

7. While the overall quality of the report narratives reviewed were good, there is room for improvement. The narrative is used to describe the events that occurred for the purposes of 1) documenting the incident 2) providing probable cause and evidentiary information for prosecution and 3) to assist with determining the correct NIBRS classification. It is very important to note that, in any job in any industry, the ability to write is a very subjective skill set, the proficiency of which will vary from person to person. Police officers are charged with a multitude of wide ranging responsibilities that are critical to the safety of citizens. Although writing may not be the most important trait for a police officer, it is a very important task. Experience and training are what improve report quality.

B. Review of News Articles

1. As has occurred in other cities, this case received significant media attention. The news articles were closely reviewed to assist with obtaining further insight and possible evidentiary information. The current inaccuracies in Milwaukee Police crime statistics actually began the day the new system was implemented. In 2005, Nannette Hegerty was the Chief of Police. Note the following quotes from a Journal Sentinel article, "Crime was down before summer" by John Diedrich on October 18, 2005 which mentioned problems with Milwaukee crime statistics as well as the new Tiburon records management system developed by CompuDyne:

- "The crime numbers were delayed because of problems the department has had with its new $7 million computer system, Hegerty said."
- "While many agencies have problems when converting to new computers, Hegerty said the problems were severe enough in Milwaukee that she has ordered $1 million of the bill withheld from CompuDyne Corp. of Fremont, Calif."
- "With the old system shuttered and the new one not working, the department went more than a month without computers, forcing commanders to use paper maps and creating a backlog of reports that continued to build all year."
- "While Hegerty and her command staff didn't know if crime was up or down across the city, she said street-level policing was not affected because districts tracked their own crimes."
- "The numbers released to the media Monday also include an inaccuracy. Initially, the department said there were 23 homicides in the first three months of this year compared with 19 over that period last year. The correct figure for the first quarter of this year is also 19. The other four were homicides later ruled "justified" and aren't counted in the total, Hegerty said."
- "Hegerty blamed that latest inaccuracy on a **"coding error"** between the department and the state." (emphasis added)

Despite the newspaper's historical perspective, it appears that today for unknown reasons a story about inaccurate Milwaukee crime statistics morphed into a series of accusatory and speculative articles suggesting the Department and Chief Edward Flynn had falsified crime statistics. The recent series neglected to mention any of the historical perspective and included, in part, the following articles and statements of particular interest:

"State, local officials seek audit of MPD crime numbers" May 23, 2012, Journal Sentinel; Ben Poston

- "Flynn said he is confident that the department's error rate for crime coding is no different from before he took over in 2008, although there *is no data available to support that yet*." (emphasis added)

"Hundreds of assault cases misreported by Milwaukee Police Department. City's violent crime rate lowered based on faulty data" May 22, 2012, Journal Sentinel; Ben Poston

- "When Milwaukee Police Chief Edward Flynn touted the city's fourth-straight year of falling crime in February, hundreds of beatings, stabbings and child abuse cases were missing from the count, a Journal Sentinel investigation has found."

- "Yet the misreported cases found in 2011 alone are enough that Flynn would have been announcing a 1.1% increase in violent crime in February, instead of a 2.3% decline from the reported 2010 numbers, which also include errors."

- "Instead of accurately reporting the weapons used as firearms, knives or blunt objects, the department reported them to the state and FBI in a way that avoided triggering scrutiny by those who review the numbers."

- "Criminologists reviewed the Journal Sentinel's findings and said they showed a pattern of misreporting that has helped drive down the city's crime rate."

- "'Misreporting is cheating the public,' said Michael Maltz, criminology professor at Ohio State University. He called the Journal Sentinel findings just 'the tip of the iceberg.'"

- "'If they are playing fast and loose, they will do it with the cases they don't send to the prosecutor,' said Maltz, senior researcher at the university's Criminal Justice Research Center. 'If it's this bad at this level, how bad can it be on the cases that don't reach eye level?'"

- "Buoyed by a falling crime rate, Flynn became the first Milwaukee police chief in 27 years to have his contract renewed in October, receiving a second four-year term."

- "In Milwaukee, aggravated assaults have made up about half of all violent crime since Flynn took charge in 2008."

- "'It indicates that these are not accidents,' Walker said. 'Somebody knows what's going on. Somebody understands the implications of reporting it this way, instead of that way. The question is: Who is making those decisions?'"

- "Neither Flynn nor several high-ranking police officials could provide an explanation for the discrepancy in weapon codes."

"MPD Staff routinely changed crime codes. Inquiry finds the practice helps create faulty violent crime rate" June 12, Journal Sentinel; Ben Poston

- "Milwaukee police record clerks have routinely changed computer codes by hand in a way that removes serious assaults from the city's violent crime rate, a Journal Sentinel investigation has found."

- "'It defies belief that this problem could be the result of 'computer error' or random mistakes by clerks,' said Samuel Walker, criminology professor at the University of Nebraska-Omaha. 'Why are the errors so concentrated in one crime category and the mistakes all in the same direction?'"

- "The Journal Sentinel's review of the system shows it allows errors to be entered at the onset and crimes downgraded easily by a small group of clerks or supervisors with the ability to later override what is entered. That provides a distorted view of crime trends."

2. The articles did not include any description of the checks and balances inherent in the police reporting process, the number of entities which review police reports as part of that process, the transparency of police reports which are widely open to inspection per Wisconsin public records law, or the fact that the Department had identified problems with its crime statistics and initiated efforts to correct them well before these articles were published. More importantly, no description of the breadth and type of conspiracy that would be required for the 28th largest U.S. police department to intentionally manipulate crime statistics and expect to get away with it was ever mentioned.

3. After more than 20 Journal Sentinel articles were published throughout mid-2012 suggesting that nefarious activity was occurring, it wasn't until November 15 that an editorial by the newspaper stated "there is no evidence now that anyone is cooking the books to make the Department look better". There wasn't any evidence to begin with and furthermore, conclusions should never be inferred or determined until all of the evidence is considered. Waiting until "now" to clear the Department of intentional wrong doing is not appropriate, professional or fair.

4. On November 24th yet another article was published, again written in a suggestive manner, stating the pressure on officers to lower crime has led to downgraded reports (no evidence of this was observed in the audit). Titled "Flawed Milwaukee crime numbers festered for years", the article contains contradictions and suggests the newspaper is responsible for uncovering the inaccuracies through "open records requests" when in fact the Department already knew about the problem. The Chief of Police has stated since his first day on the job there are concerns with the Department's systems and their accuracy and furthermore, he has communicated time and again that he wants "accurate data".

While it is correct that failures have occurred, there is ample evidence indicating the Department has been working to correct them for several years- an effort hampered by technological roadblocks and failures in effective accountability in the area of records management operations as described herein.

5. The Journal Sentinel stated its review involved comparing assault data with cases prosecuted at the District Attorney's office. The newspaper obtained NIBRS data from the Wisconsin Office of Justice Assistance and cross-referenced it with the Milwaukee County district attorney's case management database and the Wisconsin circuit court criminal database. This is a fundamentally flawed comparison. What someone is prosecuted for often changes from what the incident report indicates based on prosecutorial guidelines, discretion and further legal analysis.

6. In the article titled "Hundreds of assault cases misreported by Milwaukee Police Department", the Journal Sentinel itself revealed the flaw in their investigation when it wrote, "The only way to do a full audit of the Milwaukee police crime reporting numbers would be to review all the paper incident reports to determine whether those crimes were properly classified". Despite this realization, the newspaper continued to write accusatory articles without doing just that.

C. Discretion, Judgment Calls and Interpretation

1. When a report is required police officers have discretion in many cases regarding what the appropriate offense or charge is. Each incident has its own set of unique circumstances but one type in particular was repeatedly mentioned throughout the interviews- currently a common topic of discussion among officers.

   When someone happens to be walking by a residence where the garage door is open, a bicycle is inside and said person steals it, officers have the discretion to classify the offense as a theft or a burglary. From a law enforcement and state statute perspective, either choice would be appropriate. Some officers may opt to go with theft while others would write it as a burglary (a more serious charge). To evidence the point of this example, assume the suspect was caught. The officer has the option to arrest and charge the individual with either just the theft of the bicycle or the burglary (the act of entering the garage unlawfully). The decision of which way to go is typically made on a case by case basis. In their investigation officers will conduct a criminal history check of the individual in order to determine is this a first time offense or are they dealing with a serious criminal. Has there been a rash of these types of incidents or does it appear to be a crime of opportunity? What is the age of the offender? The answer to these questions will typically lead officers to apply the appropriate level of discretion, the application of which is a good quality to have and an important element of the criminal justice system. However, NIBRS standards require this type of incident be reported to the NIBRS program as a burglary in every case. This is why reports must go through an effective quality control process. In those cases where an officer writes the report as a theft, supervisors need to ensure it is returned for correction however this doesn't always happen due to a lack of expertise in NIBRS.

2. Another common example involves situations in which two people are fighting and one of them utilizes some type of object not ordinarily considered a weapon to strike the other. Case in point: during a fight one person grabs a shoe and begins to attack the other about the head with it. According to NIBRS, when the suspect uses such an object that is not typically thought of as a weapon during the attack, the object (shoe in this case) becomes a weapon when used in a manner that could cause severe bodily injury, thereby making it an aggravated assault, not a simple assault. But can a shoe cause severe bodily injury? It depends. Is the shoe a flip flop or does it have a stiletto heel which could poke an eye out. Are they sneakers or steel toed boots? Police officers don't typically receive training in UCR/NIBRS standards to the degree that allows them to remember these nuances of the program. This results in misclassifications being made.

3. Time and again personnel stated they have not received enough training in NIBRS and that they do not yet fully understand how it works. They also universally stated the initial training in the use of RMS was very limited and that a significant amount of time went by until the system was in place. While a group of employees were sent to a recent 2 day FBI training class, more is needed. The Kansas City Police Department trained 1500 personnel in this area and succeeded in reducing misclassifications and increasing the accountability of officers to ensure proper coding.

4. This inconsistent level of knowledge in NIBRS and report writing standards is what leads to the inconsistent interpretation in the reporting of criminal incidents and in the supervisory approval of incident reports. Training and accountability needs to increase in this area. In light of the attention this matter has received, there is no reason supervisors should be approving reports which contain classification and coding errors.

Recommendation #C.1: Increase the knowledge base agency-wide in NIBRS and report writing standards through the development of a comprehensive MPD report writing training program. Training in these areas should be incorporated into the Field Training Program, academy classes, and in-service classes. The training hours should be recorded, tracked and made a permanent part of each employees personnel file. This will solidify the use of the report error rate in COMPSTAT as a performance measure and accountability tool, particularly when the rate is determined for individual personnel as described in recommendation G.5.

Recommendation #C.2: Develop a Milwaukee Police Report Writing Manual. If no standards are in place, consistency in reporting cannot occur. The manual should be designed to teach 1) how to write a good police report for both investigative and NIBRS purposes and 2) how to use the report writing system to do so. Input should be obtained from Records Management and subject matter experts in NIBRS and criminal investigations to create a comprehensive but simple document designed to get everyone on the same page. The manual should be issued to all officers, supervisors, and records personnel, and incorporated into the Field Training Program.

Recommendation #C.3: The ARS displays in minutes the amount of time a supervisor opened a report for review. Records management is able to see this information and should document and report up the chain incidents of reports not being opened or only opened for a minimal amount of time which would indicate the supervisor did not check the report properly.

D. Review of Tiburon Records Management System and Code Tables

1. The records management system needs to be replaced. Besides not working properly, the system lacks the ability to easily provide cumulative data in an efficient and effective manner and does not have an audit trail feature allowing for documentation and transparency to occur as it should. This system needs replacing with a modern day, fully functional RMS that can provide the Department the ability to properly organize, manage and efficiently query both criminal data and administrative records. Officers have to fill out over 100 fields to complete a report.

   Today's RMS have basic features which are well beyond the abilities of the Tiburon system. Current systems can manage information produced by nearly every component imaginable in a police department including patrol, investigations, support services, human resources, quartermaster, property/evidence, traffic, K9, etc. RMS software now includes single entry capability meaning data is entered once and then reused by other modules as necessary allowing for very user-friendly features and the ability to electronically transmit or share data with other agencies in non-proprietary formats as needed for public safety. The relational database nature of the Tiburon system isn't truly relational as linkages between the different reporting modules are overly cumbersome; users must enter basic information multiple times.

   Today's systems enable queries to be conducted in numerous different ways utilizing search criteria limited only by the creativity of the user. Information can be produced in countless customizable reports and formats allowing for true crime analysis and employee productivity analytics without the need for 3rd party software. The limits of the Tiburon system are truly hampering the ability of the Department to efficiently manage records, analyze data, monitor productivity and operate transparently.

There is no audit trail feature in the system meaning edits or corrections made to reports are not recorded. There is no way to determine what was changed or who changed it. This kind of information security and transparency is critical in law enforcement.

2. Records management systems utilize a "code table" which contains, in part, state criminal statutes and a corresponding NIBRS crime code. Each crime code is supposed to correctly align with the appropriate corresponding state statute. For example the crime of simple battery and its corresponding state statute number should be listed in the code table as a "13B" in NIBRS language. Aggravated batteries are coded as "13A". When officers write simple battery reports they are supposed to select the appropriate state statute from the system to classify the report. The system then automatically associates the corresponding NIBRS crime code such that the crime statistic is reported accordingly to the NIBRS reporting program.

3. Wisconsin criminal statutes are somewhat confusing with numerous types and degrees of crimes in many of the respective categories. This leaves plenty of room for errors in RMS code tables which in the past the auditor has been employed to correct for other agencies; it is a fairly common occurrence. RMS code tables contain errors primarily for 2 reasons. First, since each state has its own unique criminal statutes these tables must be customized state to state. RMS vendors typically do not invest enough time into this task as it is labor intensive and not necessarily an area of profit. Furthermore, vendors do not update code tables as the laws change year to year; another time consuming and costly effort. Secondly, it is not uncommon for police agencies to share their own code tables with other agencies who buy the same RMS system. As the tables (which inevitably contain errors) get passed around as a matter of convenience and good natured cooperation, so too do the errors.

In Wisconsin, RMS code (statute) tables are available from the Wisconsin Office of Justice Assistance (available online). When installed in the Tiburon RMS, there were errors in the table. In 2009 the Department identified those errors and corrections were made in the assault category. There is a very clear progression of improvement in the coding (and decrease in reporting errors) beginning at that time. For example, the statute listed as "1st-DegReckEndSafety" (often selected for shootings) throughout the reports sampled prior to 2009 were coded in ARS as 90z, a code representing "all other offenses" which would not get counted in NIBRS/WIBRS totals. 2009 reports containing this statute were properly coded as 13A, an aggravated assault, indicating the coding error had been corrected (also confirmed in departmental emails). The number of errors in the sampling of reports decreased substantially after 2009.

4. The Tiburon records management system has been plagued with problems. As the Department's internal audit report states, "many service requests have never been resolved by the vendor. Since 2005 Tiburon has failed to address software problems, integration requests, system table updates and software updates that were identified and requested by the Department". The report included the below sampling of unresolved support cases submitted to Tiburon. The auditor also reviewed a long list of other additional errors reported by IT to Tiburon. The system is troublesome. Sample cases include:

Timeframe	Issue	Support number
2005-2008	Test extract not testing all records that are submitted.	74307
2005-2008	Software failing to capture all NIBRS validation edits.	8801, 84935
April 2009	UCR property category file not updating UCR code field.	10064
Sep 2009	Requested an IBR field update to allow for multiple NIBRS codes.	Unk.
2010	Requested RMS citation data capture for WIBRS/NIBRS reporting.	Ongoing
July 2011	Certain incident data not being sent to OJA/FBI due to error in transfer from ARS to RMS.	Multiple

The Department discovered in 2008 that Tiburon's validation process had missed many NIBRS validation errors which can potentially cause inaccurate data to be sent to the Wisconsin Office of Justice Assistance and ultimately the FBI. It also discovered this year that hundreds of previously submitted records were being incorrectly resubmitted by the system. These discoveries are indicative of the police department's diligence in monitoring the system's performance and desire to produce accurate crime data.

5. An on-site desk audit was conducted with Records personnel during which reports were reviewed and processed using the system. The following issues were identified:

   a. The majority of reports reviewed included mandatory fields which had not been completed by the reporting officer. These fields included missing M.O. information and missing weapon information. The Office Assistant estimated 75% of the reports she reviews have these deficiencies. Reports should never make it past the reviewing supervisor with these kinds of mistakes. However the system shouldn't allow them to occur in the first place.

   b. The design of the software prevents an efficient and effective report correction process which has led to the Department creating its own custom-built data integrity database with automatic email notifications.

   c. The system does not enable the attachment of documents including for example supporting documentation, photographs or in this case emails documenting corrections which have involved discussions between the reporting officer, supervisor and Records.

   d. Fields which appear to be greyed out and not editable are in fact editable, misleading personnel to not enter information which should be entered.

e. The "Confidential" field which is utilized to mark certain cases confidential for investigatory purposes doesn't function as it should. Oftentimes, records personnel will enter the appropriate "H" indicator only to have it disappear for no reason.

f. Data entered by Records personnel in various fields during the quality control process often disappears after navigating through the report.

g. When officers begin the process of writing a supplemental report, the system automatically populates the original reporting officer's name instead of the person writing the supplement, sometimes a different officer. This requires records personnel to go back to the original report to verify who the original reporting officer is and to determine who wrote the supplement. If this step is missed by Records, reports could potentially reflect the wrong officer's name- an oversight which could have catastrophic results in a criminal investigation.

h. An error message stating "Record has been updated by another user" randomly appears.

i. The name verification/validation process is cumbersome. When names not already in the database are entered into the system from a report, the fields required to enter the individual's personally identifiable information do not function properly.

j. The victim to offender relationship field does not always populate (this is a NIBRS mandatory field).

Recommendation D.1: It is highly suggested this system is replaced. Not doing so will prevent the Milwaukee Police Department from achieving a level of accuracy in reporting that is accomplished efficiently, consistently and transparently. The process currently in place to conduct crime analysis, data mining and statistical reporting is tremendously time consuming due only to the inadequacies of the system and the need to use 3rd party applications such as Crystal Reports. Such a system should be an integrated solution including a full suite of applications in the CAD and RMS systems allowing for centralized reporting, information sharing, and robust crime analysis features. The following are the basic components of a good police records management system:

System Modules
• Incident/arrest/accident reporting • E-citations • Field interrogations • Booking and mug shots • K9 reporting • Case management • Crime analysis • Internal affairs reporting • Property and evidence
Vendor Qualifications
• A well-established company whose growth has not outpaced their support capabilities. • A track record of success with positive recommendations from like sized agencies. • Strong business outlook with certified financial statements
Technological Features
• Global reference architecture • Browser based/thin client interface that is easy to navigate with minimal fields • Robust audit trails • Two-way report correction functionality • Code tables and report classifications should be NIBRS based, not statute-based • Forward looking software platform • Customizable to agency business rules

Recommendation D.2: The 2007 Tiburon audit recommended hiring an "owner's representative" to assist with the project. This is still recommended. A public safety records management and technology consulting firm is highly recommended to manage the selection, purchase and implementation of a new RMS in light of the problems which the Department experienced the first time around. While a previous consultant was utilized, it appears there was a lack of skill sets required for such a project.

The consultant should have law enforcement experience coupled with technological, business process and project management expertise in today's information sharing and data driven era. Once the project begins, a full needs assessment must occur with input from all levels to identify functional and technical requirements and to assist with the review and selection of a new system. A cross-section of rank and file users, records personnel, specialized units, communications, command staff and IT should all be a part of a well-orchestrated comprehensive process including research not only of available products, but of best practices to use in the selection and acquisition of such a system. As most aptly stated by the Bureau of Justice Assistance this is critical to the success of such a project:

> "Before you can effectively manage a project, there needs to be a shared understanding of that project: its purpose, objectives, scope, sponsorship, funding, and mandate. Projects often bring together a variety of internal and external stakeholders to address these areas, identify solutions, and work collectively to meet project goals. Stakeholders include project sponsors (people who see a need for change and have the authority to make something happen), project managers (those responsible for carrying out the work detailed in the project plan), and a project team (a group of individuals with appropriate and complementary professional, technical, or specialist skills, usually belonging to different groups and functions, and assigned to activities for the same project)."
>
> **A Project Manager's Guide to RMS/CAD Software Acquisition**
> **BJA, Law Enforcement Information Technology Standards Council**

Recommendation D.3: Switch to a NIBRS based reporting system such that report titles in ARS/RMS mimic NIBRS classifications. This is a substantial project that would require replacing the existing offense/statute code table and either converting all of the existing data or maintaining the current data as a legacy database.

As an alternative, this approach is best achieved with the new system as recommended in C.1. Note that while this is a significant change which should only be undertaken upon training all personnel in the new reporting style, the pay-off is well worth it. This would eliminate the coding errors altogether as well as the work required by officers, supervisors and Records Management personnel to ensure the correct NIBRS code in each and every report. The auditor has worked with RMS configured in this fashion and can attest to the elimination of coding errors and significant improvement in the efficiency of the entire reporting process.

Recommendation D.4: A request was submitted to Tiburon in 2009 to customize the NIBRS coding field so that while writing a report, officers can press F1 and have a menu of the correct limited number of NIBRS codes to pick from relative to the incident. The request was for a quote to make this customized change and it was not until 2012, subsequent to the media attention in this case, that Tiburon responded (it should never take 3 years for such a request). This change needs to be implemented immediately as a stopgap measure which will in fact reduce the room for error. However, recommendation C.3 should ultimately be implemented, eliminating the need for this measure altogether.

E. The transition to Tiburon and NIBRS Reporting

1. The transition to and implementation of a new agency-wide records management system is a formidable project in itself. Technological infrastructure must be in place, business process re-engineering has to occur and sufficient training must be provided which for an organization with over 2000 employees and limited resources is a project bound to encounter problems. How the problems are managed is the key to success. Couple such a project with a contemporaneous switchover to NIBRS reporting standards and the margin for error increases tenfold.

   While police officers are well versed in criminal statutes, NIBRS coding is a whole new world to the average police officer. Milwaukee police were no exception. NIBRS reporting is unfortunately not taught in most police academies; a failure of law enforcement. NIBRS is quite complicated and its diversion from criminal statute confuses police officers. The training that is required does not need to be of the level necessary for those who work in police records management positions. Rather, police officers universally should receive a basic overview of how the system works, why it is done and how to apply it at the reporting level [note: the auditor has provided training in this area to agencies around the country for well over 1000 personnel and routinely receives resistance to this belief by sworn personnel. The prevailing mindset is that only records personnel need to know NIBRS. This case and others are a testament to the need for a change in this mindset].

2. When the Tiburon system was implemented, all personnel were given basic user training. During this training however they were told not to change the NIBRS code since the system handles the coding automatically. The problem was, there were errors in the code table. Furthermore, the training was described over and over again by those interviewed as insufficient and too far in advance of when the system was implemented.

The knowledge was lost and users of the system were mostly flying blind and frequently selecting the wrong statute and code altogether. These factors led to significant deficiencies in the data quality and therefore in the accuracy of the crime statistics.

3. The UCR/NIBRS systems are highly misunderstood. The Florida Department of Law Enforcement UCR website page describes very well why the statistics are so misunderstood:

> "UCR numbers reflect the crimes reported by the local agencies (primarily Sheriff Offices and Police Departments) to FDLE. The UCR does not include all offenses reported to the police, but is limited to a well-defined list of reportable offenses. These offenses provide an indicator over time of variations in crime trends. In addition, a number of factors influence the reporting of offense incidents to local agencies. For example, some communities are more likely to report a crime to the police than others are. Other factors may include local report-writing policy, manpower allocations, training received by officers on report writing, training received by police records personnel on UCR standards and the decisions and discretion exercised by individuals at every step of the process. As you can see, there are many reasons for variability in reporting between jurisdictions, counties and even states.
>
> Again, UCR is not reporting total crime, but, rather, a select list of crimes reported to the police. This makes the trend data possibly more useful than the actual numbers themselves. It is generally thought that the UCR does a good job of reflecting whether crime is increasing or decreasing. Using the trend, one assumes that any problems in the reporting are consistent over the years even as the problems vary. Nationally, the victimization data (based on interviews of individuals) has mirrored the UCR data trend, which gives us some confidence in its reliability. Simply put, UCR should be used as an indicator of criminal activity but not the ultimate measure." [emphasis added]

4. To this day the lack of NIBRS understanding is still prevalent among sworn personnel. The audit revealed several emails between Records Management and sworn supervisors describing disagreements over NIBRS classifications. Additional and ongoing training cannot be emphasized enough (see appendix 6).

5. Assaults are the most problematic classification in NIBRS, having the highest error rate in all of the classifications in the reporting system. Due to the wide variety of ways an assault can be committed and the interpretive nature of the NIBRS definition, it is often difficult to determine if the crime should be classified as a simple or aggravated assault. In 2006 the West Virginia Department of Military Affairs & Public Safety, Criminal Justice Statistical Analysis Center conducted a comprehensive crime statistic study titled **"Establishing the Statistical Accuracy of Uniform Crime Reports in West Virginia"** which described how errors can occur and where they occur most often:

> "A classification error occurs when the police officers record the facts of an incident correctly, but *misclassify* the crime type. For example, an "aggravated assault" that involves a weapon is sometimes recorded by the police as a "simple assault" when the victim is not seriously injured. Such a crime classification may be correct for criminal prosecution, but not for "statistical" purposes. Given that this incident involved a weapon, it should be recorded as an aggravated assault."
>
> "The differentiation between aggravated and simple assault crimes accounted for a disproportionate amount of classification error in reported UCR statistics in WV."

> "The misclassification of crimes was more pronounced for some offenses, compared to others. The crime categories that had the highest error estimates include: simple assault/ intimidation (501), larceny (443), aggravated assault (319), other Group A (313), burglary (279), Group B (200), and general incident (128). (The numbers in parentheses represent the combined total of over- and undercounts.) On the other hand, far less or no classification error was found in other crime types. For instance, the crime of murder contained no misclassified records. Of the records sampled, all were assessed as murders by the reviewers."

> "Errors can occur at the point of automation or when automated systems are upgraded or revised. Automated systems are often programmed to allow for the automatic translation of reported crimes to UCR definitions. In these instances, reported crimes are automatically translated from state code to the UCR. These computerized systems can contain programming or algorithm problems that may result in the routine misclassification of reported offenses into erroneous UCR definitions or crime categories."

Recommendation #E.1: Supervisors responsible for reviewing reports should be held accountable vis-à-vis recommendation #G.5 and #B.3

Recommendation #E.2: Develop a separate report review and approval training class for supervisors with the objective of ensuring sufficient education in this area is provided and that supervisors universally review reports in a thorough fashion.

F. Review of 2007 Audit of Tiburon Project

1. In 2007 the Comptroller's Office conducted an audit of the Tiburon RMS project. Several critical issues were raised which corroborated the Department's current assertions regarding what caused the erroneous statistics. The audit report indicated there were significant problems with the Tiburon RMS project, a fact confirmed during this audit's findings. Many of the employees interviewed validated what was described in the 2007 report including mismanagement of the project itself and a lack of training in the system. Of particular importance however is the fact that the Comptroller's audit specifically mentioned the issue of NIBRS coding in police reports:

> "Approximately 6000 records are validated each month [in Records Management]. Of those, 8 to 12 percent fail some part of the validation [a process whereby reports are checked for NIBRS errors]. Most of these items are insignificant and are readily corrected by Central Records personnel. Typical edit failures are ones such as 'weapon tool used does not match offense class'. This edit will catch an offense where the officer indicated the crime was Simple Assault however the weapon the officer chose was a firearm. In some situations, a victim will say the suspect mentioned a weapon or even threatened to shoot them but only pushed or hit them. The officer may chose a firearm in the weapon/tool used pick list because of what the victim said. The WIBRS edits will flag this case because Simple Assault may not have a firearm as a weapon. Central Records personnel will check the narrative of the original report in ARS and if necessary, ***correct the weapon/tool used in the RMS data.***" [emphasis added]

In the previously described scenario Records personnel should have changed the NIBRS code to indicate an aggravated assault, not change the weapon code, if it was determined the suspect had a weapon on their person and made a threat. Conversely if the officer coded a report as a simple assault but the incident involved a deadly weapon, Records personnel should have changed the weapon code accordingly upon confirming this information. However, this was not occurring in many cases as Records personnel were simply changing the weapon code to "other", "unknown" or "none" in order for the report to pass through the electronic validation process. Context is important here.

2. In 2007 the system had just been implemented and mistakes are certain to occur in such a massive project. More importantly however, this incorrect processing by Records personnel was occurring due to the focus on processing reports as quickly as possible. Quantity not quality was the prevailing mantra. The employees in Records who processed reports in this fashion were carrying out the direction provided to them. It was stated time and again throughout the interviews that they were told to do whatever it takes to get the reports through the validation process quickly. As such, these employees felt quite slighted when the articles in the newspaper quoted Departmental representatives who stated the inaccurate crime stats were caused by "mistakes" made by Records personnel. In their eyes, these weren't mistakes; they were simply doing what they were told to do- get the reports submitted on time. It was not known what impact this decision would have on crime stats, a failure in oversight which the Department is now paying for.

3. Another very important factor discovered in the interviews and confirmed in further analysis was the fact when records employees were changing the weapon code in order to pass it through the validation process they were not also changing it in the M.O. section of the reports.

The employees pointed out had they changed the weapons codes for nefarious reasons they would have changed them in all areas of the report to conceal the effort, not just the NIBRS reportable field.

4. These employees made it abundantly clear as they stated, "it's our name that goes on those reports" once they review and approve them. Each employee's identifier is in fact automatically entered in the report as the person who reviewed it; if intentional wrongdoing was occurring it would be rather clear who was undertaking the effort. Furthermore, they were adamantly opposed to any notion they were told to alter reports for nefarious purposes and strongly indicated they would not be willing to do so and jeopardize their job. These employees exhibited a tremendous amount of pride in what they do and work hard to ensure the right thing is done. They support the officers of the Milwaukee Police Department and are proud to be a part of public safety.

5. Many of the employees in Records stated the overwhelming concern at the time was to not get behind and to make sure reports were processed quickly. Shortcuts were taken; when the system flagged reports during validation, the process in place at the time to get reports corrected was time consuming. The reporting officer had to be contacted using the Tiburon follow-up request system to submit corrections. Supervisors were not notified of these requests. This process would take many days considering officers days off, workload and their diligence in "getting around to it". The sheer size of the Milwaukee Police Department with hundreds of officers working in each district combined with the insufficient number of personnel in Records would have led to huge delays and backlogs if every report had been handled in this fashion.

6. The process has now been improved. One of the many subsequent efforts of the Department has been a shift in focus from "quantity to quality". Records Management is now thoroughly reviewing every report without rushing and is sending more and more reports back to the officers for correction or clarification. As a result, while quality control has increased, so has the backlog. Some 7000 reports at the time of this writing are currently pending review in Records as compared to 1500-2000 on average during the 2007 audit. This is a tremendous amount posing a significant hindrance to productivity. The Department has worked to counter this issue by instituting much more efficient methods to improve the corrections process including utilizing an email notification system. However, more Records personnel are needed. This audit did not include a staffing analysis but there is no question more personnel are needed in Records. Temporarily assigning officers who happen to be on light duty for short periods of time is not recommended.

7. It should also be noted the 2007 audit contained information which sent a strong message to the police department that its NIBRS data was accurate. Obviously this was incorrect.

> "Since 2005, MPD has submitted timely and accurate crime data reports to the State, which in turn submits the data to the FBI. The RMS is now producing extensive and accurate crime data. The Wisconsin Office of Justice Assistance administers WIBRS crime reporting statewide and confirmed that MPD's monthly crime data submittals have been timely and are accurate, having an error rate consistently below 1 percent. Both the FBI and Wisconsin require that errors be less than 3 percent [the auditor disputes this claim]. The low error rate in WIBRS crime data for Milwaukee is indicative of the quality of MPDS's data validation process"

This statement carries significant weight and it's no wonder then why the depth of the inaccuracies went undiscovered for so long.

What wasn't explained (or considered for that matter) was that state agencies which receive and process crime data submitted by local police departments check for statistical related errors only. They don't receive or review copies of individual reports and therefore it wasn't known that incorrect manual coding changes had been occurring. All that was known was Milwaukee police crime stats were making it through the validation process and were 99% correct according to the Office of Justice Assistance as relayed in the 2007 audit. We now know just how incorrect they were. It should be noted the 2007 audit was not designed to audit the statistics but rather the project itself.

8. The 2007 audit report also explained how under NIBRS, incidents which occurred in prior months can be reported during the current reporting period. The nature of NIBRS reporting is such that it allows agencies to report crimes at any time going back to January of the previous year. The State WIBRS system will subsequently allocate the offenses to the correct month based on the date of the crime. The problem with this information is found in the sentence that stated "This is normal in the WIBRS environment and should ***not cause the administration to mistrust the data generated by the system***" [Emphasis added].

   Not much else could have been communicated to the Milwaukee Police Department in 2007 to suggest its crime stats were correct. The message received was despite the problems with the project itself, the crime data was accurate when in fact it really wasn't.

Other notable statements made in the 2007 audit include:

- "Strong project management and oversight of the Crime Data System project is lacking. Failure to adequately train MPD personnel, update MPD business processes, and implement the planned conversion of existing legacy databases contributed to the delays".

- "MPD was not properly staffed to effectively direct or oversee the project and deal with deficiencies in Tiburon's performance. The project suffered from insufficient MPD commitment of resources during its nearly five year implementation."

- "MPD should develop a comprehensive training plan to bring all of its personnel to a consistent level of proficiency in the functionality needed for their positions."

- "The audit indicates that neither Tiburon nor MPD adequately controlled the overall project to minimize delays and adverse project impacts."

- "Nearly everyone interviewed in MPD for the audit pointed to insufficient training".

- "Some data appears to have been transferred from the old to new system without adequate prior validation and formatting, resulting in instances of invalid and corrupt data in the new system and diminished confidence in the system by some MPD users."

- "The size and complexity of this IT project required IT skills and training generally unavailable within MPD."

- "Sworn MPD personnel with little information technology training provided contractor oversight and managed MPD project resources".

G. COMPSTAT at the Milwaukee Police Department

1. COMPSTAT is a management system in law enforcement which revolves around the analysis of crime data in real-time, the deployment of police personnel according to that analysis and the application of consistent accountability of personnel by monitoring specific performance measurements. COMPSTAT has proven to be an extremely effective approach to lowering crime since its inception in the early 1990's in New York City. Despite its success, COMPSTAT doesn't come without controversy. At its core, COMPSTAT is used to monitor the performance of individual police officers and their level of police activity. Weekly or monthly meetings are held with Command Staff and peers alike during which this activity is openly evaluated. If an officer's or commander's performance indicators are low, they are questioned about why they are low and what is going to be done to improve them. By design, these meetings and the system overall inherently includes a level of pressure on personnel to perform better. In some police departments this pressure was incorrectly applied to unbearable levels. Threats and actions of discipline against officers whose performance indicators were low or whose crime figures were high, including demotion or termination, have occurred inappropriately in some agencies. This approach undermines the very goal of COMPSTAT as it can lead to officers artificially lowering crime figures on paper by reporting incidents incorrectly. This does not appear to be occurring at the Milwaukee Police Department.

   A standard set of questions was utilized during our formal interview process during which a cross-section of police personnel including each district captain was questioned. The questions were designed to obtain needed information as well as to elicit responses which would have revealed inconsistencies within individual statements and between the different interviews themselves. No inconsistencies indicative of misinformation were observed.

Every person stated through very assertive and candid responses that neither they nor anyone they had heard of had ever been directed to falsify or alter crime reports or statistics for any reason other than when a correction was needed or when the selected classification was open to interpretation or individual discretion. They further stated that the inherent pressure that comes with COMPSTAT incentivizes them to ensure what occurs is just what the system is designed to do: lower crime and increase officer performance. Not one person interviewed stated that COMPSTAT is applied unfairly or includes unattainable goals. Time and again those interviewed stated the Chief has made it clear he wants accurate numbers and that he understands crime happens; his overarching concern is that efforts are made to prevent it. It appears the right balance has been achieved at the Milwaukee Police Department between the inherent pressure of COMPSTAT and the providing of strong support for officers.

2. In agencies that employ the COMPSTAT model rumors abound of officers writing reports incorrectly by selecting lesser serious crime classifications in order to keep the pressure off. The auditor researched reports in the attempt to identify such activity and did not observe any patterns. Reports that are open to interpretation are often the source of such rumors or speculation; the auditor came across several such reports and investigated further by speaking to the individual officer and reviewing supervisors and determined in fact these were matters of interpretation and a lack of knowledge in NIBRS. Example: a police officer is called to the hospital regarding an individual who appears to have checked himself in with a stab or gunshot wound. The officer attempts to question the individual about what happened but the person refuses to cooperate and doesn't want to talk about it. The officer is unable to determine any details of the incident.

While the narrative of the report states that the person had a "stab wound", the officer classifies the report as an "injured/sick person" instead of an "aggravated assault" and instructs the individual to file a supplemental report if he changes his mind about talking. Taking this report at face value without further investigation would lend the appearance it was an attempt to hide a crime when in fact it wasn't.

3. Post audit interviews, the auditor attended a COMPSTAT session and confirmed what was communicated in the interviews. The meetings are professional, thorough and respectful. The auditor has attended COMPSTAT meetings at other agencies and has observed superficial accountability efforts as well as overbearing inquisitions of personnel. Milwaukee has achieved the right balance between accountability and support of personnel. Employees are not being subjected to inappropriate pressure to improve performance and lower crime.

Recommendation G.1: Ensure alignment occurs between CAD nature of call classifications and ARS/RMS classifications. Detractors of COMPSTAT will often cite the variation between call-for-service (CFS) data and NIBRS data as indicators of nefarious activity. However comparing these data sets is not a valid measurement particularly in Milwaukee where no process is in place designed to align the data sets as best as possible. The "nature of call" field is populated by dispatch/communications personnel according to the information provided by the caller and remains as is despite the investigatory findings of the reporting officer. A process should be implemented in which the reporting officer clears the call with a transmission to dispatch directing the appropriate change be made in the nature of call based on the investigation. Once this is in place global comparisons can be made with these data sets such that significant deviations in data trends can be identified allowing for further detailed analysis to determine the cause.

Recommendation G.2: Utilize the data resulting from recommendation #H.5 as a COMPSTAT performance indicator. This will allow for further detailed analysis of the general report error rate that is currently measured.

H. Review of Records Management Operations

1. Despite the overall current success of the Milwaukee Police Department's ability to achieve successful forward change and strong leadership, the fact of the matter is there was still a failure in a very important function of the Department, the result of several converging factors beginning in 2005. The importance of records management and the unit tasked with this responsibility has to a degree been neglected as has now been made evident. The Department may have thought in the past it was taking this function seriously and it may have been to the degree possible. Clearly it wasn't enough. Deficiencies in the Tiburon system and a then lack of internal controls coupled with deficient NIBRS training and individual performance are what led to the errors. Sound oversight in Records Management, better internal controls, more training and strong managerial performance could have prevented many of the errors despite the system's shortcomings. Accountability was not occurring and the errors in reporting should have been identified much earlier.

2. Organizational improvement is founded upon conducting thorough analysis of systems (processes) and performance (people). This is now clearly occurring. The Department has implemented a well-designed system of internal controls in the reporting process. Any additional controls at this point, with the exception of the recommendations herein, could potentially amount to overly redundant bureaucratic efforts which would bog down the system as a whole, negatively impacting efficiency. The focus should now be on constantly monitoring the controls and their effectiveness.

The Department has developed a ground-breaking model in the field of law enforcement records management. The data integrity database with integrated automatic email notifications, the use of the police reporting error rate as a performance measurement in COMPSTAT, the restructuring of Central Records and the use of district level quality control representatives are truly forward thinking measures as described below:

a) A data integrity database in which all reports processed by Records Management are entered and corrections thereto are recorded. Note: this successful stopgap measure is a quality control feature included now in most modern RMS as described in C.5.b. Database entries trigger automatic email notifications regarding report correction notifications or requests to the reporting officer and his/her chain of command.
b) District quality control representatives who liaison with Records Management and are responsible for district level reporting accountability and assistance with training.
c) Reorganization of records management operations as described in Appendix 3: MPD June 4, 2012 memo.
d) The reporting error rate per district is measured and monitored by Records Management and in COMPSTAT. See recommendation #G.5.

However, these truly remarkable efforts will be for naught if the current breakdown in Records Management internal communication isn't addressed. See the following:

a) Records personnel universally stated it has not been made clear to them what types of errors they are allowed to correct themselves and what must be corrected by the reporting officer. They indicated the process has continually changed, almost from one week to the next.

Yet, the Records Manager recently developed an "ARS and Data Integrity Database Guidelines" manual, distributed to her personnel (Appendix 5), which describes in detail the procedures for correcting reports going forward. How this document was created and its contents not be known by the very people who it was created for is troublesome. Thorough and consistent communication is critical- a simple task made difficult either by our own inattentiveness to its importance or by the use of a management style which denies others information. Having said this, Records Management does have daily roll calls so it needs to be determined why the message is not being either communicated or absorbed.

b) Records personnel were asked if a "Top 10" list has ever been developed which lists the 10 most frequently occurring errors found in police reports. Such a list is very useful in educating officers and reducing the error rate. All but 2 of those interviewed in Records had never heard of such a list. Yet in fact, one was developed and this list should be covered in roll calls and regular training sessions.

c) The ever important enterprise-wide understanding that Records Management is the guiding authority regarding the management and oversight of all records as well as the production of accurate crime statistics has not occurred. Thorough and effective training and empowerment of Records Management and its personnel is required for true quality control to occur. While sworn and records personnel need to mutually understand and respect each other's roles in the crime reporting process, it needs to be thoroughly communicated throughout the Department, from the top down, that Records Management does have the right to make corrections to reports.

This entity does have the final say when it comes to determining NIBRS classifications as well as input when questions arise regarding the proper statute in reports. Sworn personnel need to be respectful of Records Management's requests for corrections or further action. The rules of engagement when disputes arise regarding the correct classification of reports have been established in the data integrity database guidelines. These rules need to be consistently and regularly communicated so that the organizational culture of the police department is one which places strong emphasis on report writing. In light of the public attention this matter has received, there is no excuse for resistance to change or requests for corrections. When disagreements arise, resolution should be sought in a cooperative manner.

d) The insertion of OMAP (a unit which works directly for the Office of Chief of Police) into the efforts to resolve the crime reporting issues was the right decision. As is usual with change, unintended consequences have occurred including a measure of conflict between OMAP and Records Management. This should not be allowed to occur. Teamwork is imperative and again, considering the attention this matter has received, everyone involved should be working together toward the common goal. Records Management needs to understand that OMAP not only has the right to assist with correcting the problems that have caused the incorrect crime statistics, it is their responsibility to do so at the direction of the Chief. Conversely, as improvements occur OMAP should turn the reigns back over to Records Management once capabilities are at full capacity including sufficient training and management proficiency.

3. The Milwaukee Police Department has undertaken efforts to guard against the misclassification of crimes and there is clear and convincing evidence that it (and Chief Flynn) seeks to produce accurate information. See the following:

Appendix List	DESCRIPTION
Appendix 1	MPD memo dated February 22, 2012 regarding FBI QAR.
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Appendix 5	ARS & Data Integrity Database guidelines.
Appendix 6	November 13, 2011 email regarding aggravated assault dispute.
Appendix 7	April 13, 2010 email regarding internal crime stat audit.
Appendix 8	MPD memo dated December 13, 2011 regarding aggravated assault audit.
Appendix 9	MPD guide for aggravated assault corrections.
Appendix 10	MPD report error rate bar graph.
Appendix 11	MPD classification guide for aggravated assaults.
Appendix 12	MPD PowerPoint: Aggravated Assault Audit Nov. 29, 2011.
Appendix 13	Report Correction List.

Recommendation #H.1: A designated crime reporting and information management process owner should be established to monitor, evaluate and hold accountable the various entities involved in the production, analysis and submission of Milwaukee Police crime statistics including IT, Records Management, crime analysts, Wisconsin OJA, CIB and the Neighborhood Policing Bureau. This individual should be given the authority commensurate with the position including the ability to cross the various chains of command in order to directly address and correct problems as they occur. Currently, no single individual exists with the authority and knowledge of the process as a whole to control how each piece affects the other parts of the process.

Management of the process could be better performed by someone with sufficient knowledge, skill and authority to effect changes across the entire organization. The "process owner" would be accountable for assessing risks to the process, determining training needs, and ensuring information is accurate, complete, and timely. A process owner who is familiar with all parts of the process would identify trends in data that diverges from the norm and troubleshoot the cause or justification of the divergence. This individual should be guided by:

- COSO Internal Control-Integrated Framework
- MPD Policy
- NIBRS
- Wisconsin Office of Justice Assistance reporting guidelines and suggestions

Recommendation #H.2: Increase human capital in Records Management. There are currently 18 Office Assistants working in Records along with 2 supervisors. While this project did not include a staffing analysis there is no doubt through our expertise that at a minimum there should be 25 such positions to allow for proficient operations with an emphasis on quality, not quantity, without a backlog. The review of 30-35 incident reports per day per employee is the industry standard. See Appendix 2 which describes the staffing analysis conducted by Records Management.

Recommendation #H.3: Enhance internal auditing in Records Management by conducting monthly audits in a controlled and centralized fashion which include detailed analysis of report error rates department-wide, district-wide, per-shift, per-supervisor, per-officer, per-crime classification. It will be difficult to implement such extensive auditing efforts without increasing manpower as recommended in #G.2.

Recommendation #H.4: Enhance internal auditing by conducting monthly call-backs of a valid number of randomly selected crime victims in their respective crime classifications to determine if the submitted report accurately reflects the incident. This would be completed via telephone and reviewing the narrative with the victim.

Recommendation #H.5: Publish a monthly "Report Correction List" which includes a listing of reports reviewed by Records Management containing errors even after supervisory review. Include the reporting officers and reviewing supervisors names for everyone to see. One list would include the officer's names alphabetically and another should list the supervisors alphabetically. Listing this information in a spreadsheet will quickly reveal who is listed the most and each person's individual error rates can be determined. This tool will identify personnel needing additional training and/or effort in their report writing and review/approval activities. This data should be measured in COMPSTAT and the list should be distributed monthly to each district's supervisors and the process owner as recommended in #G.1. This tool has proven to lower report error rates by 10%. No one wants to be on "the list" (see appendix 13).

Recommendation #H.6: Increase problem identification and training related communications from Records Management to all personnel such that trends in reporting errors are swiftly communicated via a 360 degree approach including email, roll call videos and when necessary one-on-one meetings.

Recommendation #H.7: Provide the Quality Control Representatives access to the data integrity database to allow for district level research of error trends and problem performers.

Recommendation #H.8: Conduct an agency-wide information management assessment using an outside public safety records management consultant. The audit revealed disparate management of information which could potentially lead to missing records. The municipal citation project, the existence of numerous paper forms and the inability to attach documents to RMS records are areas of concern.

Recommendation #H.9: CALEA accreditation should be sought. While this requires a very significant effort and long-term investment, it is well worth it. Compliance with CALEA standards ensures effective policies and practices which would improve the management of information throughout the agency.

Recommendation #H.10: While there has been concern in the past with the level of detail written in report correction emails, providing further details regarding the errors and needed corrections would be helpful to officers.

Recommendation #H.11: Create a Data Management Committee comprised of a cross-section of police and IT representatives responsible for convening monthly to monitor the progress of the internal controls, assess needs, solve problems, and to begin formalizing the management of the new RMS project.

Recommendation #H.12: Distribute the "Top 10 Error List" throughout the Department for review in roll calls, the Field Training Program and in the report writing manual described in recommendation #B.2.

Recommendation #H.13: The Records Management SOP which is currently being developed should be finalized quickly.

Recommendation #H.14: Enhance the working environment in Records Management through the utilization of modern and effective leadership principles. Employee centered organizations wherein personnel have a say in the decision making process, are recognized for their work by superiors and are compensated accordingly achieve superior results. Records personnel are currently paid the same rate as they were in 2006. A pay increase should occur commensurate with the increased demands and expectations placed on Records Management.

I. Organizational Culture at the Milwaukee Police Department

1. The formal interviews conducted in this audit are a particularly important element of the audit's findings. Interviewees were informed that their names would not be included in the report and candid responses were encouraged. A standard set of questions were asked that were designed to elicit responses which would have revealed inconsistencies within individual statements and between the different interviews themselves. No indications of misinformation were observed. Every person assertively stated that neither they nor anyone they had heard of had ever been directed to falsify or alter crime reports or statistics. Many of the people interviewed, especially those with prior investigative assignments confirmed they had read reports involving incidents which could be interpreted in different ways and that it is not uncommon for different officers to classify reports in different ways based on the unique circumstances of each incident and the level of experience and knowledge of individual officers. The auditor asserts that this is in fact a common issue in policing.

2. The auditor has worked in law enforcement and on consulting engagements where the environment and culture of the agency was devastatingly toxic. This does not appear to be the case in Milwaukee. To the contrary, it was consistently stated through our formal and informal interviews that while morale can fluctuate between districts, the Department overall is in good shape. Such an environment is necessary in the efforts to ensure *systems* and *performance* are occurring the way they should be.

   The current administration has worked feverishly and successfully to raise the level of professionalism to unprecedented levels through modern and efficient management systems, improved performance and enhanced technology.

There was an overwhelming sense of pride in one's work, accountability and leadership throughout. The majority of the employees interviewed expressed sincere positive feedback of the current Chief of Police, with many saying he has been the best one so far. Many of these employees had over 25 years of experience with the Department. Strong support for personnel, particularly in the Neighborhood Policing Bureau is occurring, the downside of which is described below.

3. The Department's shift in focus to crime prevention on the front end, including placing more investigative responsibilities on patrol officers as opposed to just being report takers, is a model that while some agencies follow now, is taking hold more and more in law enforcement. Simply put it is a model that makes sense and multi-year crime trend figures bear out that success in Milwaukee. The auditor has worked as a police detective, supervisor and commander and can attest to the fact that this approach is not only successful in terms of crime but is also a smarter and more efficient way of doing business. Overtime costs go down and resources are spent more wisely.

   Yet as often happens there are unintended consequences and in this case morale has been negatively impacted in the Criminal Investigations Bureau (CIB). Real or perceived, investigative personnel feel their function and place in the Milwaukee Police Department has been devalued and this must be addressed quickly. Each administration over the years has had different outlooks on the role of CIB so this is no surprise. There is conflict between patrol officers and detectives with some officers indicating when they do still need a detective they don't bother calling one because of the conflict.

   They also feel if they are going to be doing more investigative work, they should be trained accordingly. Conversely, sometimes detectives are not as willing to assist patrol officers as they once were.

While there are valid arguments stating this cultural issue will eventually work itself out, it is not worth the risk that comes with letting that happen on its own. If not addressed, it is an issue that can potentially take root in the very fiber of the Department and take on a life of its own with devastating consequences including declines in performance, quality control and thus the accuracy of police reporting and Milwaukee crime statistics.

Some of those interviewed stated it is fairly common for supervisors to not read a report during the approval process. They just click approve and send it through because of this divide as well as a lack of consistent oversight. Some lieutenants and captains are strict about the review of reports while others are not. Recommendation #H.5 is an excellent tool to correct this issue.

4. An interview was conducted with District Attorney John Chisholm who confirmed his office has not received complaints of altered reports and there has never been an indication of such activity or submission of reports that appeared false. He explained that many of the cases presented by the police for prosecution tend to include higher charges than what are required, not lower. He also stated that errors in case management systems are fairly common, are not unique to police agencies and that efforts to alter crime reports could not successfully occur considering the number of parties involved in the process. He did not think the Milwaukee Police Department was manipulating crime statistics.

Recommendation I.1: Resistance to change is prevalent in law enforcement and it certainly exists now due to the paradigm shift in the investigative roles of officers and detectives. It would behoove the detractors of this shift in operations to respect that change happens and to focus on the mission. If it has not occurred already, it would also behoove the Office of the Chief to increase communicative efforts designed to alleviate the angst caused by this change. This cultural divide should be addressed from multiple angles in a concerted team-building effort. Constant messaging of the mission, the need for teamwork and support for personnel is critical at all levels.

IX. Acknowledgements

Appreciation and many thanks are extended to the dedicated and hard working professionals at the Milwaukee Police Department, especially those who assisted with the audit in the Office of Management, Analysis and Planning and in Records Management.

X. Appendices

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Appendix 1

Form PM-9E
11/09

MILWAUKEE POLICE DEPARTMENT
MEMORANDUM

Date: February 22, 2012

TO: John M. HAGEN
Assistant Chief of Police

CC: Joel B. PLANT- Chief of Staff
Kurt LEIBOLD- Inspector of Police
Peter D. PIERCE- Captain of Police
Nicole DEMOTTO-Crime Intelligence Specialist

FR: Shannon M. SEYMER-TABASKA
Police Sergeant

RE: 2012 Federal Bureau of Investigation Quality Assurance Review (QAR) Audit

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Chief Edward A. FLYNN has requested that the Federal Bureau of Investigation (FBI) conduct a Quality Assurance Review (QAR) of the Milwaukee Police Department's WIBRS/NIBRS data, which includes Year 2011 and 2012. The FBI, in coordination with the DOJ has agreed to conduct the QAR in May 2012.

The MPD has assigned the following member's who will have oversight during this Quality Assurance Review (QAR). Crime Intelligence Specialist Nicole DEMOTTO will have analytical oversight, while I will have statistical oversight.

The Department's mission for WIBRS/NIBRS reporting is to provide accurate crime classifications, clearances, arrest counts, identify patterns, trends and anomalies and correct errors through a validation process. The Department's vision is a multi-layered review process for IBRS/NIBRS reporting, providing a series of checks for data quality and validity.

To ensure accurate NIBRS/WIBRS reporting, Department members shall properly file reports, selecting statutes reflective of the incident being reported and supervisors shall accurately review reports to ensure probable cause elements are met. The Central Records Division-Records Management Section (CRD-RMS) personnel shall review reports to ensure offenses reported, meet WIBRS/NIBRS definition with the proper IBRS coding and that all ARS fields are accurately completed. The last quality control checkpoint is the Central Records Division-Records Management Section, prior to WIBRS/NIBRS submission.

For documentation and record retention of CRD-RMS data reviews, a Data Integrity Database is currently being developed. The Data Integrity Database will provide data to

assist in developing proficiency in incident reporting, by identifying patterns of misclassified reports, under-reporting or over-reporting of crimes, and ARS training needs of Department members.

The CRD-RMS Day and Early Shift are currently staffed by thirty-one (31) clerical civilians, which include three (3) civilian supervisors. Additionally, there are two (2) Police Officers. Responsibilities in the CRD-RMS include the Telephone Report Unit (TRU), Imaging prepping and the review and validation of ARS reports. In 2011, MPD filed 147,214 incident reports, 64,665 originals and 82,552 supplements. In 2011, the CRD-RMS reviewed and transferred 137,170 reports.

Several audits of various Part I crime categories revealed deficiencies in the processing of data. The deficiencies include but are not limited to, unfounded reports, misclassified reports, inadequate clearances, outstanding follow-up requests and missing data. For CRD-RMS personnel to understand the importance of their role in the processing of the data from data entry review to statistical and analytical review, the following resolutions have been identified to correct the deficiencies:

- All CRD-RMS personnel shall be provided with the State WIBRS manual and the Federal NIBRS manual
- All CRD-RMS personnel shall be assigned specific crime category responsibilities to which they shall review and correct IBRS data as needed
- All CRD-RMS personnel are required in their review of ARS reports to read all supplements and enter data for any incomplete or missing data in the modus operandi tab
- All CRD-RMS shall also be required to conduct a quarterly audit on all unfounded and baseless ARS reports and ensure the RMS "Investigation Status" field is completed
- All CRD-RMS personnel shall attend training in their assigned crime category to reach a minimum level of proficiency
- All CRD-RMS personnel shall attend regular continuous training
- All three (3) supervisors assigned to CRD-RMS shall be responsible for conducting quarterly audits on Part I crimes and clearances and correct IBRS data as needed
- The Records Management Head shall coordinate and provide weekly documentation to OMAP from the Data Integrity Database as part of the bureaucratic measures for Compstat
- The Records Management Head shall author a quarterly memorandum (PM-9) on the Department's ARS report writing needs reflective of the Data Integrity reports
- ALL CRD-RMS personnel shall attend Compstat on a regular basis
- CRD-RMS personnel shall be temporarily assigned to IFC on an as needed basis to facilitate analytical support
- The Records Management Head shall alert the District or Sector Commander regarding any identified crime patterns or trends
- The Records Management Head shall be responsible for reviewing UCR Summary data prior to submission to the Office of the Chief

CRD-RMS personnel are the backbone of the reporting, statistical and analytical process. Chief Edward A. FLYNN and the public, who rely on MPD's data, driven policing philosophy, values CRD-RMS personnel's professional WIBRS/NIBRS expertise.

Effective Monday, February 27, 2012, Crime Intelligence Specialist Nicole DEMOTTO and myself will conduct Day and Early Shift meetings at 11:00a.m. and 4:00p.m. to explain the implementation of the proposed resolutions. It is imperative that all CRD-RMS personnel attend one of the meetings.

Appendix 2

Form PM-9E
11/09

MILWAUKEE POLICE DEPARTMENT
MEMORANDUM

COPY

Date: Monday, March 12, 2012

TO: PISD Charles BURKI
Office of Police Information Systems

FR: Administrative Specialist Senior Drita M. SPAHIU
Office Supervisor II Therese CIESLAK
Office Supervisor II Eileen STUTT
Records Management Section

RE: REORGANIZATION OF THE RECORDS MANAGEMENT SECTION

SIR:

This report is being submitted at the request of Assistant Chief John M. HAGEN relative to the needs and requirements of the Records Management Section to move forward with the proposed reorganization of this section.

The success of any endeavor is related to the level of commitment and accountability of the persons involved. It is critical that participants be fully aware of what they will be responsible for and receive the training necessary for them to successfully perform their responsibilities, prior to them being held accountable for those duties. Based upon this premise, the following critical areas have been developed to ensure the successful transition and operation of the Records Management Section.

RESPSONSIBILITIES:

The RMS will be held responsible for:

- The final review, freeze and transfer of ALL ARS reports entered into Tiburon with the exception of those filed by the Professional Performance Division. This review will include verifying:
  - Nature of Call, statute number and IBRS code are correct
  - All names for correct MNI#
  - Proper formats are used for names and locations
  - Proper involvement and property codes are used
  - All persons, property, vehicles have been included on the appropriate tabs
  - Required Modus Operandi information has been recorded properly
  - Arrest information matches original CMS and reflects statute appearing on the original
  - Perform supp matching for required report
  - Validate the record
  - Send appropriate service requests to reporting officer requesting corrections

  This review conducted by RMS personnel in no way absolves the officer of his responsibility to enter the report correctly. In addition, supervisors must continue to exercise due diligence when conducting the supervisory approval of the report.

- Currently RMS personnel ensure that the ARS reports required to provide the supporting documentation needed for Missing Person CIB/NCIC entries have been filed. Even though this is not the responsibility of the Records Management Section, this extra effort was made by personnel due to their past experience with the reports and a desire to provide the accurate documentation needed for CIB/NCIC audits. Going forward, RMS personnel will only be responsible for the review, freeze, and transfer of the report as submitted in ARS. We have

ceased providing this service, and responsibility should be assumed elsewhere. All forms, attachments, and documents related to Missing Person Reports should no longer be routed to RMS. These items should be directed to the Technical Communications Division, NCIC Unit. Upon completing their review, the NCIC Unit will be responsible for routing these documents to the Imaging Unit for scanning.

- WIBRS Validations, audits, error corrections
- Timely submission of statistics
- Routine training of RMS personnel (RMS personnel will no longer conduct ARS training to recruits, police aides, refresher training, etc.)
- The Freeze and Transfer of requests to cancel incident numbers based upon the supervisor's approval.

STAFFING:

The staffing decisions and requests presented within this report are based upon the following facts.

- 140,000 reports were reviewed, and frozen and transferred by RMS personnel in 2011. (This figure varies slightly from the original estimate due to the omission of the reports processed by OAII KOLEAS who had been transferred during the course of the year).
- There are 247 work days/per year for RMS personnel (excludes, weekends, holidays, furlough days.
- Based upon these figures, and assuming there are 17 persons to process reports, each person must process 33 reports per day. (8,151 reports per person/year)
- RMS will lose a total of 400 working days due to the below:
    - Six (6) workdays to officer In-Service training. Two officers / 3 days per year.
    - 17 workdays for civilian in-service. One day per year.
    - 34 workdays due to "Personal" or "09" days. Two per civilian each year.
    - 71 weeks (355 working days) due to vacation time allotted to the designated RMS personnel. (Allotted vacation in weeks: Krauser 6, Chudzicke 6, Hill 6, Ward 5, Shin 2, Bridges 5, Peterson 4, Silvernail 6, Siemik 5, Hogan 2, Adame 2, Genskow 5, Robertson 3, Hall 6, Kroening 3, Mendez 3, Horwarth 2).
    - The time lost exceeds the 1.5 positions over the course of a year and will need to be replaced to maintain 17 persons per day required to process reports on a daily basis. These are the positions equivalent to having OAIV FISHER and OAII SMEJKAL assigned to RMS.

REQUIREMENTS for EFFECTIVE REORGANIZATION/IMPLEMENTATION:

1. Immediately begin seeking a replacement for the Office Supervisor II position to be vacated as of 4/14/2012. This will allow ample time for the OSII to work with the remaining Office Supervisor II, prior to her retirement later in the year and ensure a smooth transition.

2. Relocate the Telephone Reporting Unit (TRU) and all associated duties (obtaining incident numbers, supervisor approvals, teletypes, and citizen copies mailed), and absolve RMS of all responsibility for the TRU. RMS will process TRU reports in the same manner as all other ARS reports.
    a. The TRU telephone extensions and TRU hunt group must be disabled and/or relocated as determined by the DPR Focus Group.
    b. Notification must be made and ample time allowed for the installation of phone equipment and lines for RMS personnel and to have new extensions provided as needed.
    c. CAD computer utilized by all TRU personnel can be removed and relocated to an appropriate work location or Telecommunications Division could resume responsibility for providing incident numbers for TRU calls.

3. Relocate the Imaging Unit to the Open Records Section. The Imaging Unit is to assume responsibility for all incoming daily mail containing report attachments, Arrest and Detention Reports, Forced Entry Reports, Vicious Animal Reports, Subrogation Letters, incoming teletypes to MWCR.
    a. OA TORDENSHIELD to be transferred to Imaging Unit to assist with the prepping of the above named documents.

b. Additional part / full-time position filled. OAII Cynthia WALKER (part-time), currently assigned to the Imaging Unit is unable to work day shift due to holding a full-time day job.
c. TIME terminal MWCR is to be removed. If there currently is not a terminal that can receive all teletype messages sent to MWCR in the Imaging Unit area, this terminal should be relocated to that area.

4. Remove all super user security rights from non-RMS personnel. Instead, all supervisory personnel will be given the rights to re-open any report in Supervisor Approved (SA) status.

5. Intense training in state statutes and elements of the crime is required. This training should be conducted by members of the Training Academy and be based upon the same information provided to recruit officers.

6. Separate the Records Management Section and the Open Records Section and provide each with a unique work location code to allow each location to monitor their payroll, overtime, budget and other administrative functions.

7. Job titles, classifications, and salaries must be changed to adequately reflect the knowledge, skills, and educational requirements needed to successfully perform the duties and responsibilities associated with these positions.

8. Personnel changes:
   Additional personnel required:
   - Require the immediate addition of 2 persons with law enforcement experience (PSS's, permanent limited duty, other law enforcement trained) to assist with RMS personnel training, audits, extracts, and all around support for RMS personnel.
   - Two (2) additional civilian positions (to replace OAIV Fisher – on extended FMLA and not expected to return to duty, and OAII Smejkal – educational conflict with day shift hours) .
   - One (1) Additional position to assist with Crash reports and all traffic related ARS reports.

   Transfer of personnel:
   - OAII TORDENSHIELD to be transferred to the Imaging Unit.
   - OAII KROENING – request for transfer to NCIC Unit should be denied at this time. OA KROENING's departure will result in maintaining less than the minimum staffing required for maintaining sufficient expertise in all crime categories.
   - OAII SMEJKAL, early shift, is attending classes offered only during day shift hours. In addition, once accepted into the Biomedical Sciences/Medical Tech Degree Program her classes, and clinicals commencing January 2013 will also conflict with day shift hours. An assignment that offers reasonable accommodation should be located.
   - OAII WALKER, part-time, early shift is unable to work days and currently holds a full-time, days, position with Milwaukee County.

9. Disable Coplogic. Due to the poor quality of the information submitted by the citizens in their on-line reports, the rejection rate for these reports is one rejection for each two reports filed. In addition, the number of reports returned for corrections is nearly equal to the number of rejections. Also, if the TRU will be operational on all three shifts, the use of TRU to file these reports would be more efficient.

10. Have all personnel work 8am – 4pm. There should be no need to stagger hours. Approximately 90% of all requests for assistance (to include Late and Early Shifts) are requests to open a "supervisor approved" report. Questions should be directed to work location shift supervisors/commanders prior to contacting RMS for assistance. Work locations are asked to make use of all the instruction manuals and materials available to them as a valuable resource. Remaining questions could be handled through email and/or a blog-type format once an RMS share-point site is created.

11. All work locations must be informed, and understand, that the RMS has the final word in respect to IBRS codes and offense report entry.

    AND

    Protocols to be followed if there is disagreement between the RMS expert and work location supervisor must be established.

12. Booking errors need to be eliminated – remedial booker training needs to be provided.

13. Officers are to be provided remedial training on arrests and it must be reiterated that the selection of the statute number for arrests is based on the original offense, not the charge as determined by the reviewing DA.

14. Office Assistant II Joann LYBEK, Integrated Justices Services Division, must assume full responsibility for CMS arrest problems/issues and resolve them on her own versus contacting RMS for assistance.

15. Provide adequate parking for personnel.

16. Allow reasonable time for early shift personnel to make necessary accommodations to change from early to day shift.

17. EXPECT BACKLOGS, and increased overtime as this reorganization is implemented and personnel gain the required knowledge and expertise required for their assignment.

DESIGNATED EXPERTS:

Several unsuccessful attempts were made to assign personnel strictly based on IBRS codes. Due to several crimes sharing the same IBRS code, we have come to the conclusion that the Nature of Call must also be taken into consideration. Therefore, expert groups have been formed. (See attachments.) These experts will be responsible for certain IBRS codes that encompass a wide range of offenses.

These groups have been formed based upon their knowledge and experience, the Nature of Calls and the overall number of incident reports encompassed within the group, and the difficulty and complexity of the reports for which they will be responsible. For members other than Group #1, training will be essential to have members reach expert status for some of their designated offenses. Each group has been assigned, what appears to be, a manageable number of reports; however, these groups will need to be monitored and fine-tuned as this project progresses.

Respectfully submitted,

Drita M. SPAHIU
Administrative Specialist Senior
#005147
Records Management Section

Eileen R. STUTT
Office Supervisor II
#003976
Records Management Section / Days

Therese E. CIESLAK
Office Supervisor II
#004003
Records Management Section / Early

Appendix 3

Form PM-9E
11/09

MILWAUKEE POLICE DEPARTMENT
MEMORANDUM

COPY

Date: Monday, June 4, 2012

TO: John M HAGEN
Assistant Chief of Police

CC: Police Information Systems Director Charles BURKI
Information Technology

Administrative Specialist Senior Drita M. SPAHIU
Records Management

Deputy Inspector William JESSUP
Office of the Chief

FR: Deputy Inspector Mary K. HOERIG MKH
Administration Bureau

RE: RECORDS MANAGEMENT REORGANIZATION

ADMINISTRATION BUREAU
JUN 07 2012
RECEIVED
APPROVED
Original to W. Jessup
cc: C. Burki
D. Spahiu

Ma'am:

This document will serve as a chronological accounting and explanation of the reorganization of Records Management (formerly known as Central Records).

Historically, Records Management personnel were responsible for various duties related to the Department's permanent records. A majority of the focus had been on managing the record for proper entry into the Automated Reporting System (ARS) and Records Management System (RMS) system, validation and retention. Scrutiny of the report was limited to ensuring that the mandatory data fields were properly populated for transfer of the record from ARS to RMS. Most Records Management personnel were not authorized nor trained to review reports authored by officers and detectives for inconsistencies between the elements of the crime and its' relationship to the appropriate state statute and/or incident based reporting (IBR) codes.

As of May 13, 2012, Records Management will focus solely on the final review, freeze and transfer of all ARS reports entered into the Tiburon records management system (RMS) with the exception of those filed by the Professional Performance Division. This review will include verifying and ensuring the accuracy of the reports primarily related to the following:

- Nature of call
- State statutes/Elements of crime
- IBRS codes
- Proper formats are used for names and locations
- Proper involvement and property codes
- All persons, property, vehicles have been included on the appropriate tabs
- Required Modus Operandi information has been recorded properly
- Arrest information matches arrest charge in Corrections Management System (CMS)
- Perform supplementary matching for required report
- Validate the record

A12-0119

- Enter review information into a data integrity database that electronically sends an email notification on errors and/or correction to the member authoring the report, the supervisor approving the report, the work location Quality Control Representative and the Commanding Officer
- Trend analysis, Division level auditing and communication of identified deficiencies

The reorganization of Records Management has evolved over the past two years. The initial changes consisted of elimination or reassignment of tasks that were not related to actual records management such as stolen vehicle desk duties, teletypes, medical alerts, transcription, non-traffic records and open records requests.

The most recent and significant changes began in February 2012. The changes were divided into four phases: strategic planning, reorganization design, implementation and assessment.

Strategic Planning Phase

February 28, 2012 Records Management supervisors, Office of Management, Analysis and Planning (OMAP) representative and Criminal Investigations Bureau (CIB) representative met to discuss the timeliness, accuracy and quality of police generated reports. It was determined that Records Management would be responsible for developing a plan to reorganize Records personnel to focus primarily on quality and accuracy of departmental reports.

March 12, 2012, the reorganization plan was submitted for review and approval.

March 19, 2012, Deputy Inspector Mary HOERIG assigned to assist with Records Management reorganization.

ASSr Spahiu

March 21, 2012, Representatives from OMAP and Intelligence Fusion Center, DI HOERIG and ~~I officially~~ announced the reorganization to Records personnel, including a listening /questions session. The data integrity database (created by OMAP) and its' purpose was introduced to all Records personnel.

May 13, 2012 reorganization implementation date

Design Phase

Focus Records Management personnel on ARS reports exclusively including the review and correction (if necessary) of each police generated ARS report. Records personnel will have final authority on classifying crime codes for each incident report. Subject matter expert groups created based on statutory and IBRS classifications for all reports.

Records personnel will enter information related to each report reviewed into a data integrity database. The information entered would include both corrected and non-corrected reports, explanation of report errors and follow-up required if applicable. The database will serve as a mechanism to identify report deficiencies, including potential trends. Database entries that articulate a correction made during the review will generate an email to the member authoring the report, the supervisor approving the report, the work location Quality Control Representative and the Commanding Officer.

Each District and Division, having staff authorized to file reports that are entered into the RMS, identified one or two members at their work location to serve as a Quality Control Representative (QCR). The QCR will be responsible for ensuring the quality and accuracy of the reports at the work location, serve as a liaison with Records Management personnel and finally assist in training and educating members at their location on identified areas of concern or deficiency.

Records Management reassigned all personnel to dayshift operations only and assigned all personnel to one of five expert groups (see attached descriptions).

Telephone Reporting Unit duties (originally assigned to Records Management) decentralized to District personnel based on incident location via Technical Communications. District Commanders, Communications and Records will develop a transition, logistics and resource allocation plan.

Creation of a Records Management Share Point site for the purpose of posting of information about reporting errors, frequently asked questions and clarification on IBRS definitions. Additionally, the site would serve as a communication tool for Records Management personnel internally and with various department members related to the current status of the RMS, reporting trends, IBRS updates and training opportunities.

Implementation Phase

- **April 2 – April 5, 2012** Records Management personnel attended enhanced training related to state statutes, elements of a crime and IBRS
- **April 20, 2012** Office Supervisor II vacancy published
- **April 25, 2012** Meeting with Commanders, Communications and Records related to TRU
- **May 3, 2012** Office Assistant II position published
- **May 13, 2012** Reorganization implemented and operational
- **May 13, 2012** Mandatory entry in Data Integrity Database
- **May 13, 2012** Telephone Reporting Unit and all associated duties decentralized to the Districts
- **May 14 – May 24, 2012** On-site training of state statutes and elements of crime by the Training Division
- **May 27, 2012** Imaging Unit transferred to Open Records
- **May 29 – June 8, 2012** – Records personnel provided training for all QCR personnel

Assessment Phase

- **May 14-May 24, 2012** Daily reporting on Records Management personnel report reviews and corrections based on state statutes and IBRS coding
- **June 4, 2012** First weekly audit of Records Management personnel report review (100% accurate)
- **June 6, 2012** First Comp Stat measurement introduced related to report quality
- **June 7- 22, 2012** Records personnel job tasks and functions review and documentation
- **June 11-August 30, 2012** Creation of Records Management Share Point
- **August 2012** FBI NIBRS training for all Records Management and QCR personnel
- **September 2012** Records Management personnel job description and function assessment Sept / Sept

The reorganization of Records management has been successfully implemented and is already contributing to the improvement of the quality of reports and the reporting process. Between May 13, 2012 and June 3, 2012, Records Management personnel processed and reviewed 2,451 newly generated reports of which 245 needed IBR code corrections (10%).

Appendix 4

Introduction

2008 marked the beginning of a new era in the Milwaukee Police Department as this agency began a renewed focus on crime reduction through an approach that was community-based, problem-oriented and data-driven. At that time, violent crime was an unrelenting problem and the department's technology was lacking, yet the men and women of MPD pressed on, and together with the community, made significant progress toward stabilizing neighborhoods and reducing violent crime. Our success did not happen by accident. It was the result of a focused strategy that uses technology more effectively and deploys officers more thoughtfully while joining forces with citizens to solve the problems that afflict our community. In some areas success can be easily measured. Milwaukee's homicides dropped from a twenty year average of 127 to a four year average of 85, and auto thefts dropped by 42% since 2008. Many other crime categories also saw significant declines over time.

Other police departments have used similar strategies and have seen similar reductions in crime. Some of those agencies have also relied heavily on technology to advance their policing strategies and they too had to confront data quality issues. One notable example is the Kansas City, Missouri Police Department who purchased the same records management system and has been working to resolve the comparable data quality issues that result from a combination of human error and an inferior data system. These types of data quality issues must be addressed in order to afford the public a certain level of confidence in our policing strategies and we are currently taking several steps to accomplish that goal.

Targeted Audit

In 2011, the Milwaukee Police Department responded to 238,657 calls for service and filed over 63,000 crime reports. We believe that the vast majority of those reports were filed accurately, but also realize that errors will occur in any large volume of data. Consequently, we constantly strive to improve our processes and procedures in order to reduce those errors, and we look at all mistakes with care. The FBI also recognizes the existence of data errors and has established procedures that are designed to improve data quality in all agencies. One important quality control mechanism is the FBI's Quality Assurance Review (QAR) whereby a small number of agencies are audited each year in order to determine the agencies error rates and systems deficiencies. In March 2010, Chief Flynn's Office made inquiries and found that Milwaukee had in fact never been selected for an FBI Quality Assurance Review (QAR). Upon discovering this fact, Chief Flynn requested that our agency be included in the list of cities to be audited and the FBI confirmed that request on January 10, 2012. The CJIS FBI Audit Team performed the QAR in May 2012 and the results have been received.

This voluntary request for an FBI audit is an important point in light of allegations made by the Milwaukee Journal/Sentinel. On May 22nd, 2012, the newspaper released an article insinuating that our agency was purposefully miscoding offenses in order to show a reduction in crime. The writer specifically focused on the assault category and concentrated his efforts on those reports that were filed during the past three years. On May 23rd, 2012, the day after those allegations were made, the Milwaukee Police Department began looking into the matter and started a review of over 34,000 simple assault reports in order to determine the scope and reasons for errors.

The audit team was comprised of approximately twenty-five members from various locations within the department and the team included civilians as well as police officers, sergeants and lieutenants. The Office of Management, Analysis and Planning oversaw the "targeted audit," which focused on misclassifications relating to state statutes, IBR codes, injury codes and weapon codes in simple assaults, child abuse cases and other offenses. From our initial review of the data these categories were identified as the areas of concern with respect to errors. It should be noted that in order to identify the scope of the problem over time, the audit team reviewed offenses from all years in which we have complete electronic data within the Tiburon System (2006-2012).

The method used during this audit to assess classification error involved the identification of assault type reports within the total report categories, which contained potentially incongruent information. The NIBRS crime categories of review included Simple Battery (13B), Disorderly Conduct (90C), Family Offenses, Non-violent Crime (90F), and All Other Offenses (90Z). Weapon codes that were reviewed included many categories as explained in Figure 1.

IBRS Code	Weapon Type
11	Firearm (Type not specified)
12	Handgun
13	Rifle
14	Shotgun
15	Other Firearm
16	Pellet/BB Gun (includes Pistols/Rifles)
20	Knife/Cutting Instrument (Axe, Ice Pick)
30	Blunt Object (e.g. Club, Hammer, etc…)
35	Motor Vehicle (When used as a weapon)
40	Personal Weapons (Hands, Feet, Teeth)
90	Other
95	Unknown
99	None

(Figure 1) Weapons as identified in NIBRS Handbook

In total, over 34,000 simple assault reports between years 2006-2012 were electronically filtered to identify reports in need of further scrutiny based on the likelihood of miscoding errors that were initially recognized by auditors. A systematic procedure for assessing each record was established to ensure consistency among the auditors, who assessed the IBR codes, the weapon force field, and injury fields in the ARS. These fields were compared to the IBR data fields in RMS in order to confirm a classification error or reaffirm the accuracy of the original classification and weapon/injury coding. Additionally, all investigative reports were read thoroughly during the audit process to ensure accuracy in reporting. In those incidents where a classification or weapon code error was confirmed, corrections were made in RMS and documented in a centralized audit database, created and maintained by the Office of Management, Analysis and Planning. The corrections will be submitted to the State OJA.

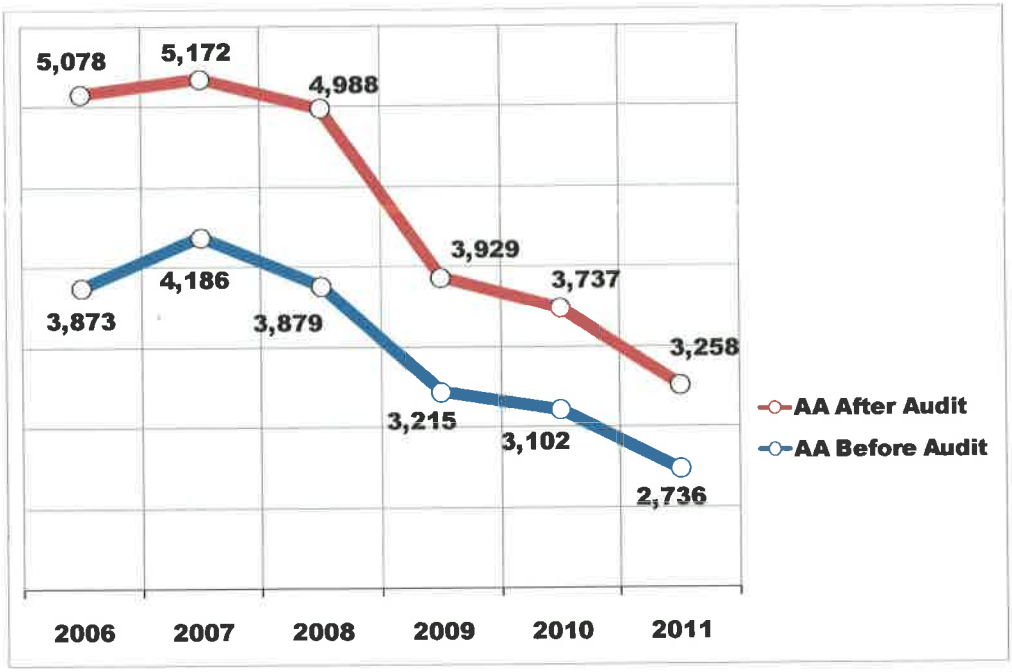
It is important to point out that this targeted audit was conducted in an effort to quickly identify and address problems with these reports. This method allowed us to prevent similar errors in the future, while also correcting the past errors and adjusting the past records with state and federal agencies. Because we targeted reports that had a greater likelihood of being miscoded we found errors at a much higher rate than would be found in the general population of crime reports. The over-sampling of problematic reports introduces sample bias and prevents us from offering a statistical error rate at this time. Nonetheless, the audit provides some very useful information.

Three points can be made with respect to the results of this audit:

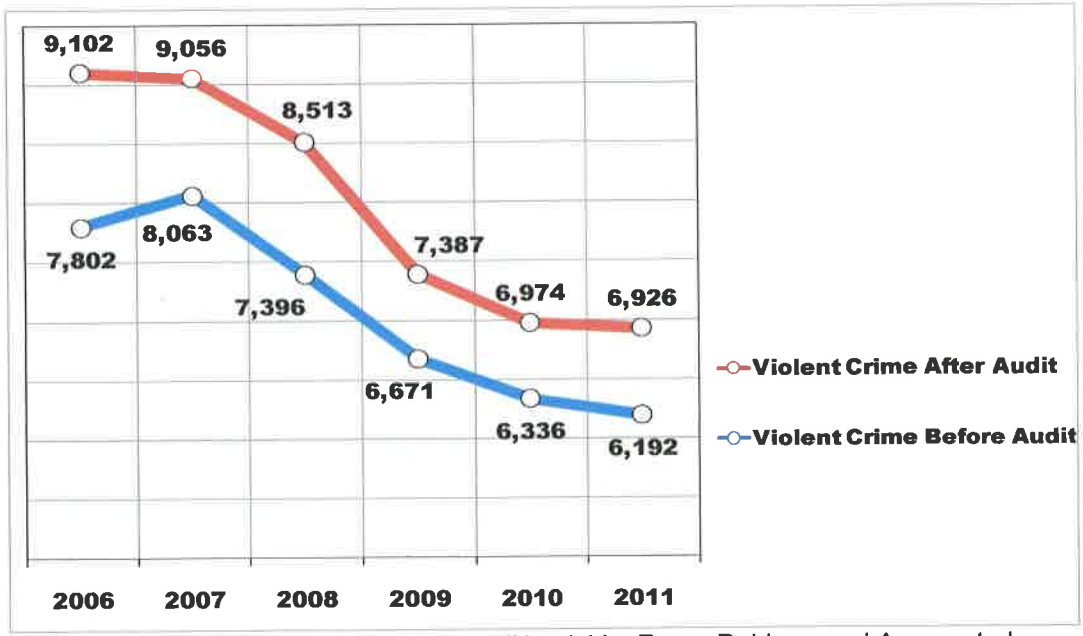
- The crime of Aggravated Assault has decreased significantly over the past six years
- Crime reporting errors resulted in both over-reporting and under-reporting
- Over the past six years, error rates have decreased in the reporting of Aggravated Assaults

To illustrate the results of the audit, the below charts provide 2006-2011 published UCR and targeted audit data for aggravated assaults in Milwaukee. The chart also shows the aggravated assault numbers for each of those years after including the additional offenses identified during the audit. Clearly, even after accounting for the errors recognized during the audit, aggravated assaults dropped significantly in the city of Milwaukee. It is important to note that after accounting for the errors in each of the years of review, according to UCR, aggravated assault did in fact drop from 3,737 incidents in 2010 to 3,258 incidents in 2011, a reduction of 12.8%. Aggravated assault declined 35.8% according to UCR standards from 2006-2011 (See Figure 2). Even after accounting for the under-reporting of aggravated assaults, violent crime, which includes

the aggravated assault crime category, declined 23.9% from 2006-2011 (See Figure 3 and Figure 4).



(Figure 2) Illustrates aggravated assault counts before and after IBR code adjustments made in RMS and reported by UCR standards.



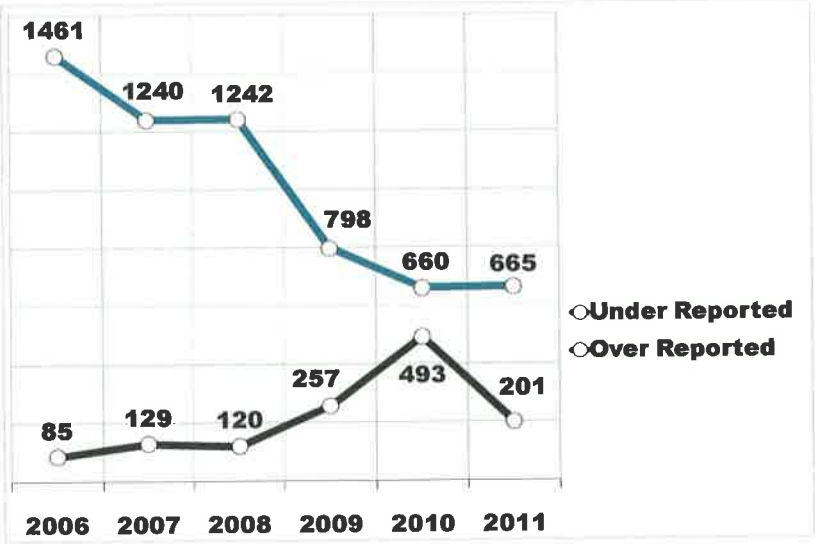
(Figure 3) Illustrates violent crime counts (Homicide, Rape, Robbery and Aggravated Assault) before and after IBR code adjustments made in RMS and reported by UCR standards.

UCR Summary A Report: Run on 8-17-12

	2006	2007	2008	2009	2010	2011	2006-2011 % Change
Homicide	103	105	71	72	95	87	-15.5%
Rape	236	236	205	205	195	205	-13.1%
Robbery	3685	3543	3249	3181	2947	3376	-8.4%
Aggravated Assault	5078	5172	4988	3929	3737	3258	-35.8%
Burglary	5786	6217	6350	6578	6207	6940	19.9%
Theft	24896	24402	23795	23480	21236	19579	-21.4%
Auto Theft	8379	7752	6541	4875	4329	4563	-45.5%
Arson	321	7752	320	359	249	272	-15.3%
Violent Crime	9102	9056	8513	7387	6974	6926	-23.9%
Property Crime	39061	38371	36686	34933	31772	31082	-20.4%

(Figure 4) The FBI Uniform Crime Reporting program is comprised of two different collection systems, Summary Based Reporting (SBR) and Incident Based Reporting (IBR). The Milwaukee Police Department records and reports all data to OJA/FBI in IBR format. OJA converts this IBR data to SBR as seen in this report. IBR and SBR data cannot be directly compared because the counting methods are different. For example, SBR applies the UCR Hierarchy Rule when more than one Part I offense occurs in the same incident. The offense highest in the hierarchical list is counted.

In addition, although the error rate is still significant and does require our immediate attention, the rate of error within the audited category has declined over the past six years. Figure 5 shows the number of under-reported and over-reported incidents for each year and illustrates the reduction in misclassifications. From years 2006-2011, rates of under-reporting declined by 54.4% while rates of over-reporting increased by 136%.

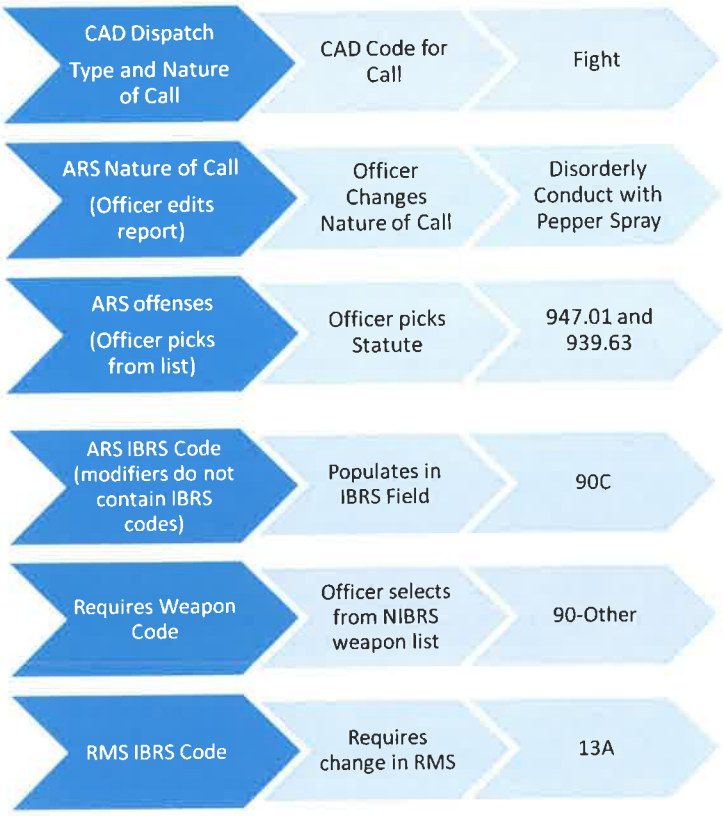


(Figure 5) Under-reporting counts IBR code classifications as being less than the actual crime classification. Over-reporting counts IBR code classifications as being more than the actual crime classification.

Error Identification

In order to address the error rate within our reporting system we reviewed the misclassifications and looked for commonalities. Members of the audit team found an assortment of errors and found that the reasons for those errors were also varied. The auditors also found that a variety of mistakes were made at each level within the reporting process, from the initial filing of the reports by officers and detectives, to the reviewing of those reports by supervisory staff, and finally during processing of reports by clerical staff. The errors fell into two categories, human error and system deficiencies, and many of the mistakes were caused by a combination of these factors.

The following scenario is an example of human error caused by system deficiencies and this case highlights one type of error that was found on multiple occasions during the audit. The state statute for Disorderly Conduct 947.01 has four potential IBRS codes based on the specific details of the incident. Possible IBRS codes for Disorderly Conduct are 90C, 13A, 520, and 13C, which are dependent upon whether the incident involves a public disturbance, person/society as victim, threats, or weapons. Figure 6 illustrates how this error potentially flows through the system when filing a Disorderly Conduct While Armed:



(Figure 6) Disorderly conduct flow chart

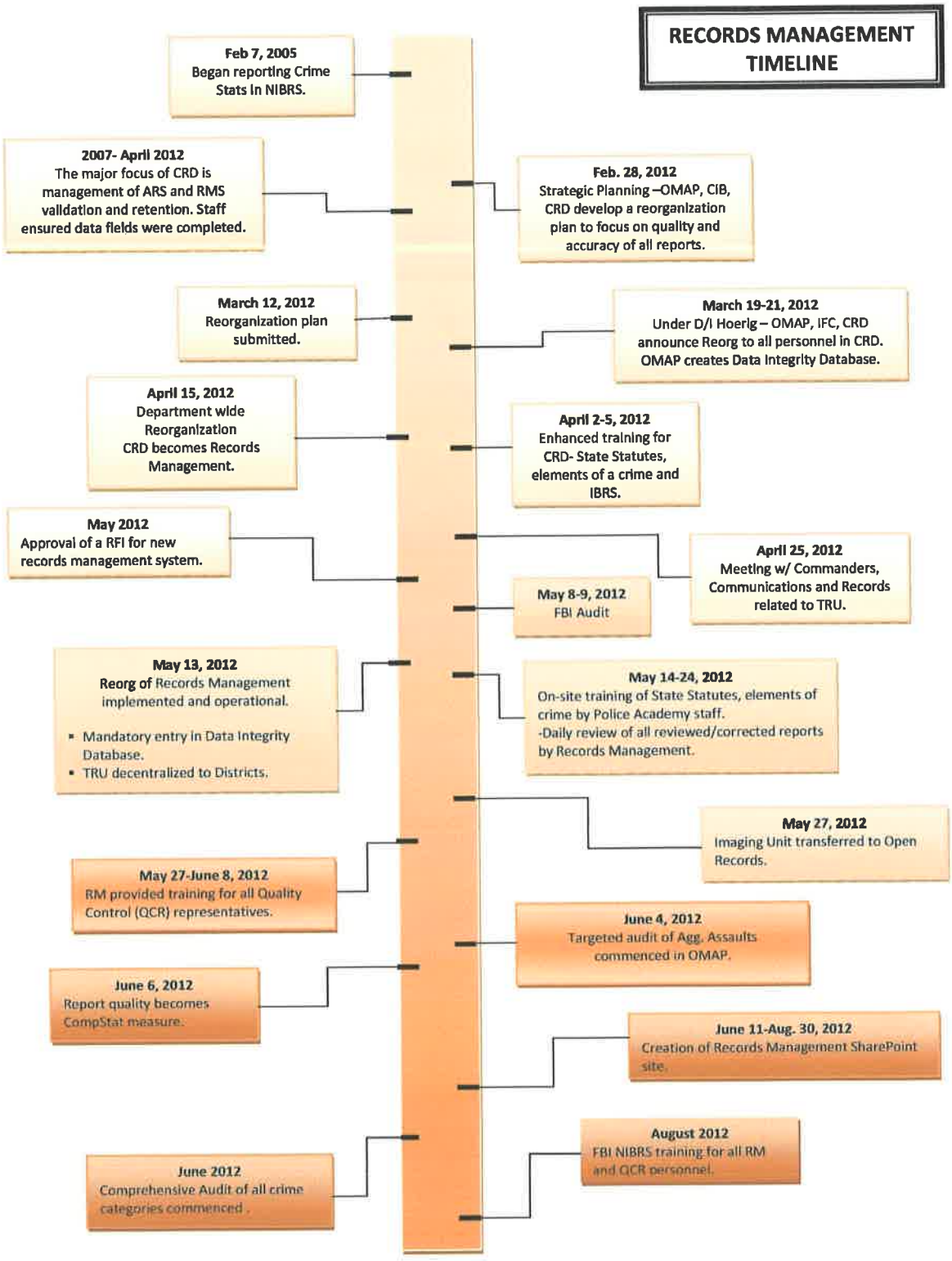
Figure 6 shows the complexity of filing a basic crime such as Disorderly Conduct. The criminal incident report can reflect a properly filed crime according to state statute, but because a weapon was used, IBR requires that the crime be reported as an Aggravated Assault. In IBR, Disorderly Conduct 947.01 is considered a Group B offense and in the Tiburon ARS it is auto-populated with the correct IBR code (90C) for a Group B offense. However, because there was a weapon (pepper spray) used, the reporting officer also attaches the weapon modifier 939.63 during the initial report. IBR does not recognize modifiers and therefore, there is no assigned weapon code for this modifier, however, the existence of a weapon changes the Group B offense to a Group A offense for IBR purposes. Unless a reviewer understands this incongruence and manually makes the IBR change in Tiburon RMS, the incident will be reported inaccurately (under-reported) for IBR purposes even though it was filed correctly according to state statutes.

Process Improvement Plan

The illustration in Figure 6 is just one of many examples where both technology and training deficiencies can impact data quality. The audit team has more precisely identified a few of those areas in need of attention:

- A data system that limits the identification of IBR choices during the report process
- An offense table containing more than 1,800 State Statutes and subsections
- IBR coding errors that have resulted in miscoded crimes
- Use of State Statute modifiers that have no relevance in IBR
- A validation process that allows for improper coding of some weapons
- Insufficient training regarding IBR coding guidelines
- The lack of continuous internal quality control audits

It is important to note that several of these deficiencies were also identified during an administrative review of the Milwaukee Police Department's Records Management Division by the Office of Management, Analysis and Planning (OMAP). This administrative review took place in February 2012 and the review resulted in a number of recommendations including a major reorganization of Records Management. On March 12, 2012, a process improvement plan was submitted and approved, and the reorganization began (See Figure 7 for a detailed timeline of Records Management changes).

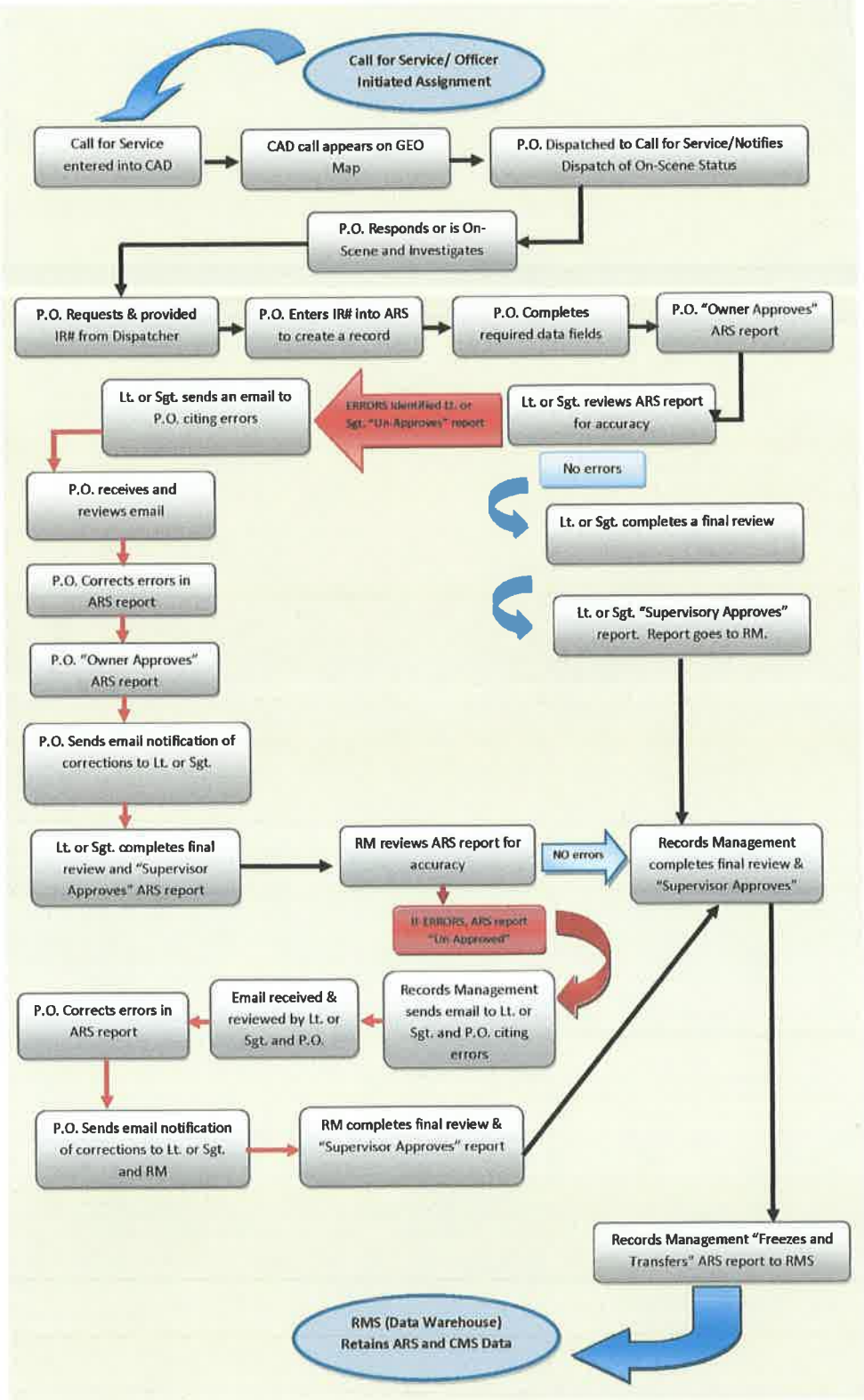


(Figure 7) Timeline of Records Management changes

The reorganization of Records Management has been fully implemented and it consists of the following:

- Decentralization of the Telephone Reporting Unit and Imaging Unit
- Reassignment of RMS personnel to the Day Shift
- The creation of five "Subject Matter Expert" groups to improve data quality
- Enhanced training for Records Management personnel regarding State statutes and IBR
- The establishment of district and division "Quality Control Representatives"
- The creation of a revised Incident Report Flow Chart
- The design of a Data Integrity database to audit errors
- The introduction of a new e-mail notification system for reporting data quality issues
- Fixed responsibility and final authority to make coding corrections

In addition to these major changes within Records Management, the department has introduced a regular review of reports during its weekly CompStat meetings, thereby allowing the agency to gauge its progress toward improved data quality. As part of the reorganization, the Department arranged for additional IBR instruction, which was conducted in August 2012 by UCR experts from the FBI. The reorganization was well received and the changes are believed to be having a positive impact on report quality. The revised Incident Report Flow Chart illustrates some of the changes that have taken place (See Figure 8).



(Figure 8) Incident Flow Chart

Data Management Systems

As stated, improvements were made to our processes and additional training was provided, but another area in need of attention is the Department's current records management system. This system has contributed to the data quality problem, but in order to clarify, a brief history of our current data system is necessary.

In 2002, the Milwaukee Police Department entered into a contract for a new crime data system with Tiburon, a subsidiary of CompuDyne Public Safety & Justice, Inc. at a cost of 7.3 million dollars. The MPD Tiburon Crime Data System is a law enforcement enterprise system that records, processes and reports information on crimes and contains substantial information on operations such as response times and officer activity. The Crime Data System is comprised of four integrated subsystems, the Computer Aided Dispatch (CAD), Automated Reporting System (ARS), Corrections Management System (CMS) and the Records Management System (RMS). All four of these subsystems join together to share and exchange information.

The Computer Aided Dispatch (CAD) is a processing system and data capture system for citizen calls for service and officer initiated activity. The CAD System records details and becomes a part of the record in both ARS and RMS after completion of a crime incident report. The Corrections Management System (CMS) serves as MPD's arrest and booking data capture system and includes information on both the arrest and arrestee (i.e. date, time, type of offense, age, gender…)

The Automated Reporting System (ARS) is the "front end" of the system and is a criminal incident and investigative data repository used by officers to report the details on crimes they are assigned to investigate (i.e. victim, suspect, weapons, injury, property, and narratives). The Records Management System (RMS) is the "back end" of the system and is a permanent data collection warehouse used to generate a vast array of statistical reports on crimes committed in the city of Milwaukee. The RMS also captures certain required data from the ARS and passes that data on to the State as part of Wisconsin Incident Based Reporting System (WIBRS). The State then passes the data to the federal government for purposes of reporting under the Uniform Crime Report (UCR) guidelines.

On February 7, 2005, the Milwaukee Police Department, one of the twenty largest police agencies in the nation, began reporting crime statistics in the National Incident Based Reporting System (NIBRS). Reporting in IBR is voluntary and is far more detailed than reporting in the traditional UCR format. From the reported IBR data, the DOJ extracts summary data and that data becomes the UCR crime numbers for

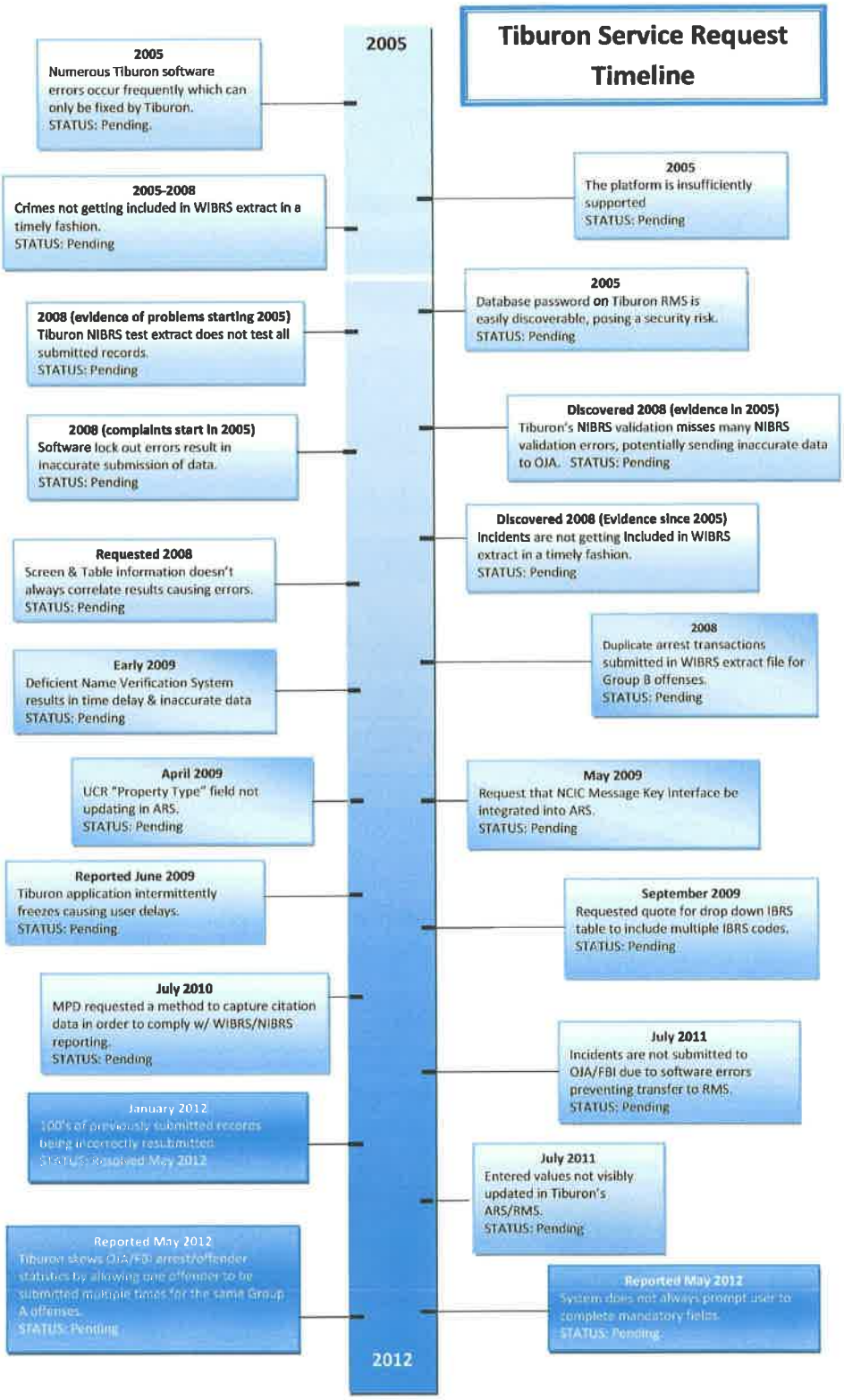
Milwaukee. It is important to note that through the "hierarchy rule" filtering process, IBR crimes are filtered out and therefore, are not included in summary (UCR) reporting.

As the Milwaukee Police Department was transitioning to Incident Based Reporting in early 2005, the agency also went "live" with the original version of Tiburon, 7.4.1. After doing so, MPD did encounter significant problems with its implementation of the Tiburon System, resulting in an initial delay in WIBRS reporting for year 2005 – 2006. On July 19, 2007, 10th District Alderman Michael J. Murphy requested an audit of MPD's Tiburon System to determine whether the new system met the needs of MPD and to establish whether the state crime reporting requirements were being met.

The 2007 audit, conducted by the City Comptroller's Office, concluded that MPD had encountered significant problems during implementation of the system and was having difficulty with some important system functions that were not yet operational. The audit also concluded that while problems were considerable, the core functions of the Tiburon System were implemented and functioning, and the reporting of crime data to the State was occurring within acceptable accuracy limits.

As the Tiburon System was put into operation, many additional concerns were identified and many issues were eventually resolved; however, the Tiburon System has always been difficult for our personnel to navigate and challenging for our IT Division to manage. Over the course of the past several years the city of Milwaukee has paid the vendor an additional $269,619 for modifications intended to address specific issues and those expenditures have resulted in only minimal improvement. In addition, many service requests have never been resolved by the vendor. Since 2005 Tiburon has failed to address software problems, integration requests, system table updates and software updates that were identified and requested by the Department. The following are a few necessary yet unresolved support cases our Department has submitted to Tiburon:

- 2005-2008: Test extract not testing all records that are submitted
- 2005-2008: Software failing to capture all NIBRS validation edits
- April 2009: UCR property category field not updating UCR code field
- May 2009: Requested NCIC Interface message key integration into ARS
- September 2009: Requested an IBR field update to allow for multiple IBRS codes
- 2010: Requested RMS citation data capture for WIBRS/NIBRS reporting
- July 2011: Certain incident data not being sent to OJA/FBI due to error in transfer from ARS to RMS
- 2012: OJA/FBI arrest/transfer statistics skewed due to software allowing multiple submissions for same individual in Group A offenses



(Figure 9) Timeline detailing outstanding Tiburon support requests

Several steps have been taken in recent months to address the inadequacies in our Records Management System, and in August 2011 a decision was made to review the current system before upgrading to the latest Tiburon version 7.8. In September 2011, Chief Flynn directed the formation of a Steering Committee to assess the current system and determine the best course of action. In May 2012, a Request for Information (RFI) was developed and the City is currently reviewing vendor submissions to potentially settle on a new Data Management System. The estimated cost of the proposed new system is $7.5 million.

The Comprehensive Audit

Reliable data is vital to this agency and we take these matters very seriously. In order to better understand the degree of reporting error within our crime numbers, the Department has begun a comprehensive audit of crime across all categories, spanning the past six years. The planning phase of the audit was directed by analysts of the Intelligence Fusion Center (IFC) and the audit is being managed by the Office of Management, Analysis and Planning. The comprehensive audit will provide the Department with a finding of a statistically valid error rate across all crime categories, accounting for over-reporting and under-reporting misclassifications. This detailed analysis will take some time, but it will ultimately provide transparency with our reporting process as well as contextual accuracy regarding our crime numbers.

Conclusion

The subject of accurate crime numbers is important and the desire for answers is understandable. We welcome an external review of our systems and processes as we work to improve accuracy in reporting. The efforts of our police force, by any measure, have had a substantial and positive impact on the levels of crime, fear, and disorder within the city of Milwaukee. Those crime reductions in turn have had a positive impact on our neighborhoods. As we move forward, in the process of identifying and correcting deficiencies in the reporting of data we will continue to provide information on our progress and offer context to our numbers. Meanwhile, the men and women of the Milwaukee Police Department can be counted on to work diligently on our crime problems each and every day, and they deserve the support of this community as they act in partnership with our citizens to tackle those difficult issues and create neighborhoods capable of sustaining civic life.

Appendix 5

Our Mission...

"Provide accuracy in crime reporting. Provide analytical support through crime identification, trends and anomalies and to provide error validation through data quality validity."

"Be A Force"

ARS AND DATA INTEGRITY DATABASE GUIDELINES

Created by – Administrative Specialist Senior Drita M. SPAHIU

2012

ARS REPORT REVIEW GUIDELINES

- Records Management personnel are responsible for the final review and transfer of all ORIG and SUPP - "Supervisor Approved" ARS reports entered into Tiburon, supp match if applicable and the validation.

The exceptions are:

Reports filed by the Professional Performance Division
Homicide ORIGS
Homicide Supps containing an Arrest
Sexual Assault ORIGS
Sexual Assaults containing an Arrest

- Records Management personnel will supp match and validate all Homicides and Sexual Assaults.

NOTE: Records personnel will need to consult with Homicide and Sexual Assault Divisions prior to making changes to their reports.

- Records personnel subject matter experts have final authority on classifying crime codes for each incident report.

The report review process will include, but is not limited to, verifying and ensuring the accuracy of the reports primarily related to the following:

- Nature of Call (If changed, the Crime Code field in the MO Tab must also be corrected).

- State Statutes /Elements of Crime

NOTE: Only change the Statute if it is glaringly obvious that it is incorrect – Example: CDTP that is a Burglary. Otherwise only change the IBRS Code field.

- IBRS codes

√ Incorrect change/correction
Statute changed from 943.20(1) to 943.20(1)(A)[23A].

√ Correct change/correction
IBRS code changed from 23B to 23H.

- Proper name and address format
- Proper involvement and property codes
- All persons, property, vehicles have been included on the appropriate tabs
- Required Modus Operandi tab information has been recorded properly
- MNI verification
- Arrest tab information matches arrest charge in Corrections Management System (CMS) and a note must be entered in the RCS Tab "AT TIME OF REVIEW – ARREST TAB INFO MATCHED BOOKING"
- Perform Supp Match if applicable
- Validate the record
- Entry in the Data Integrity Database

- **No Error Procedure: (NO CORRECTIONS MADE)**

If no error is identified Records personnel "freeze" the record, transfer the record into RMS, validate the record and supplement match the record if applicable.

- **Error Identified Procedure: (CORRECTION NEEDED, FOLLOW-UP NEEDED)**

A correction is required or there is a need for follow-up (aka service request).
Records personnel leave the ARS report in "UA" (unapproved) status.

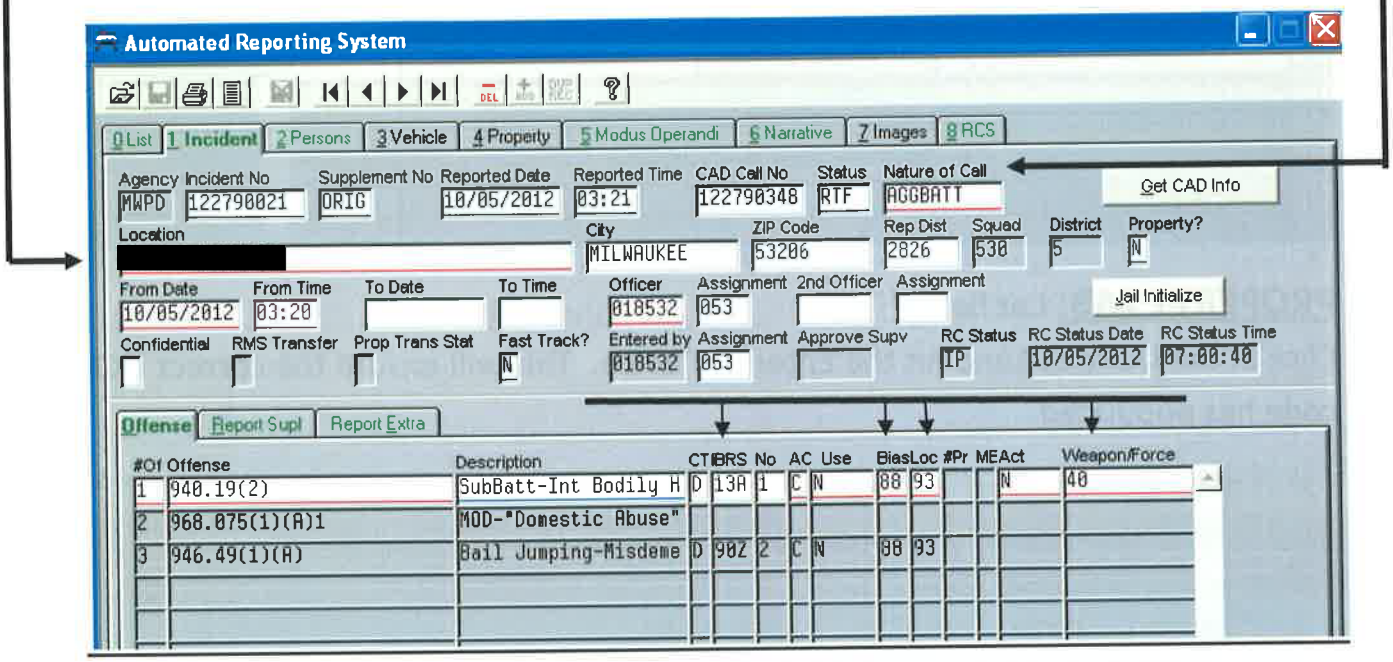
In the RCS Tab, Records personnel shall enter the words "Follow-up sent" and then what the follow-up request is for.

Upon receipt of the appropriate correction/follow-up information, Record's personnel will conduct a final review and if no other follow-up is deemed necessary they will freeze and transfer the report, validate the record and supp match if applicable.

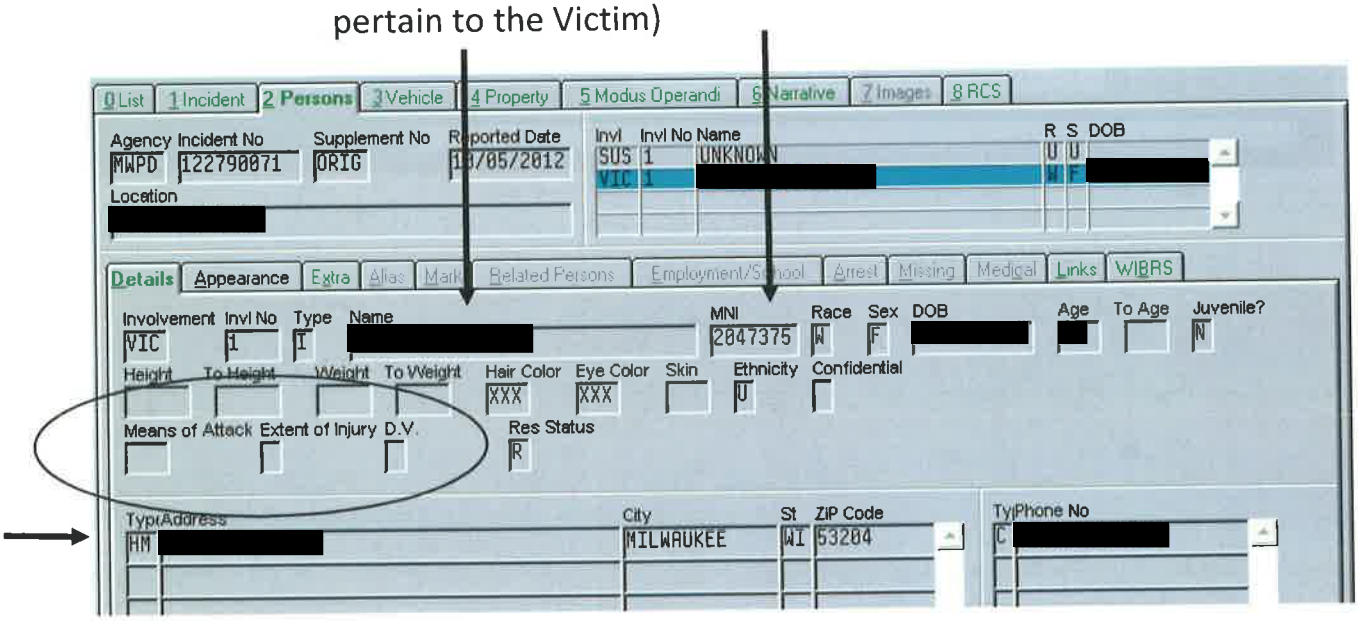
IMPORTANT FIELDS THAT MUST BE CORRECT OR COMPLETED

INCIDENT TAB: Nature of Call
Proper Address Format

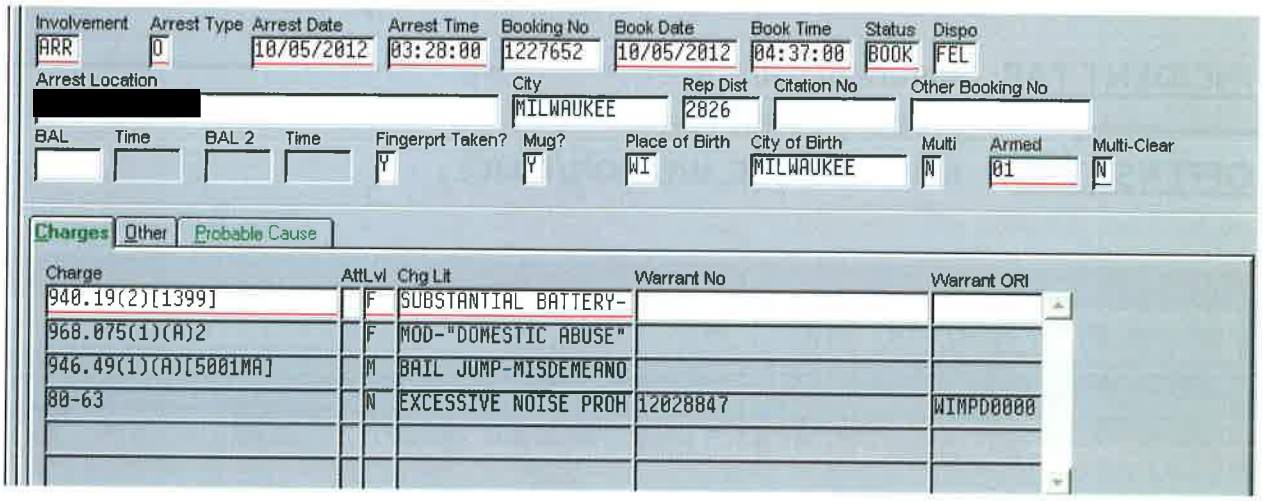
OFFENSE TAB: IBRS, BIAS, LOC, WEAPON/FORCE



Persons Tab: Proper Name Format, Verify MNI, Proper Address Format
Means of Attack, Extent of Injury, D.V. (NOTE: These 3 fields pertain to the Victim)

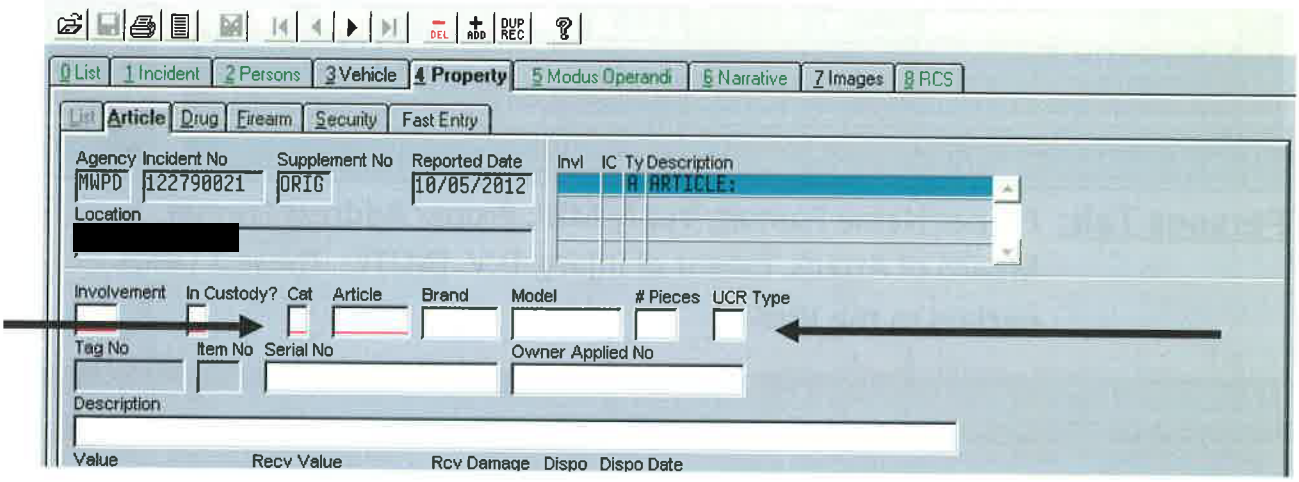


ARREST SUBTAB: Charges match Corrections Management System-Booking

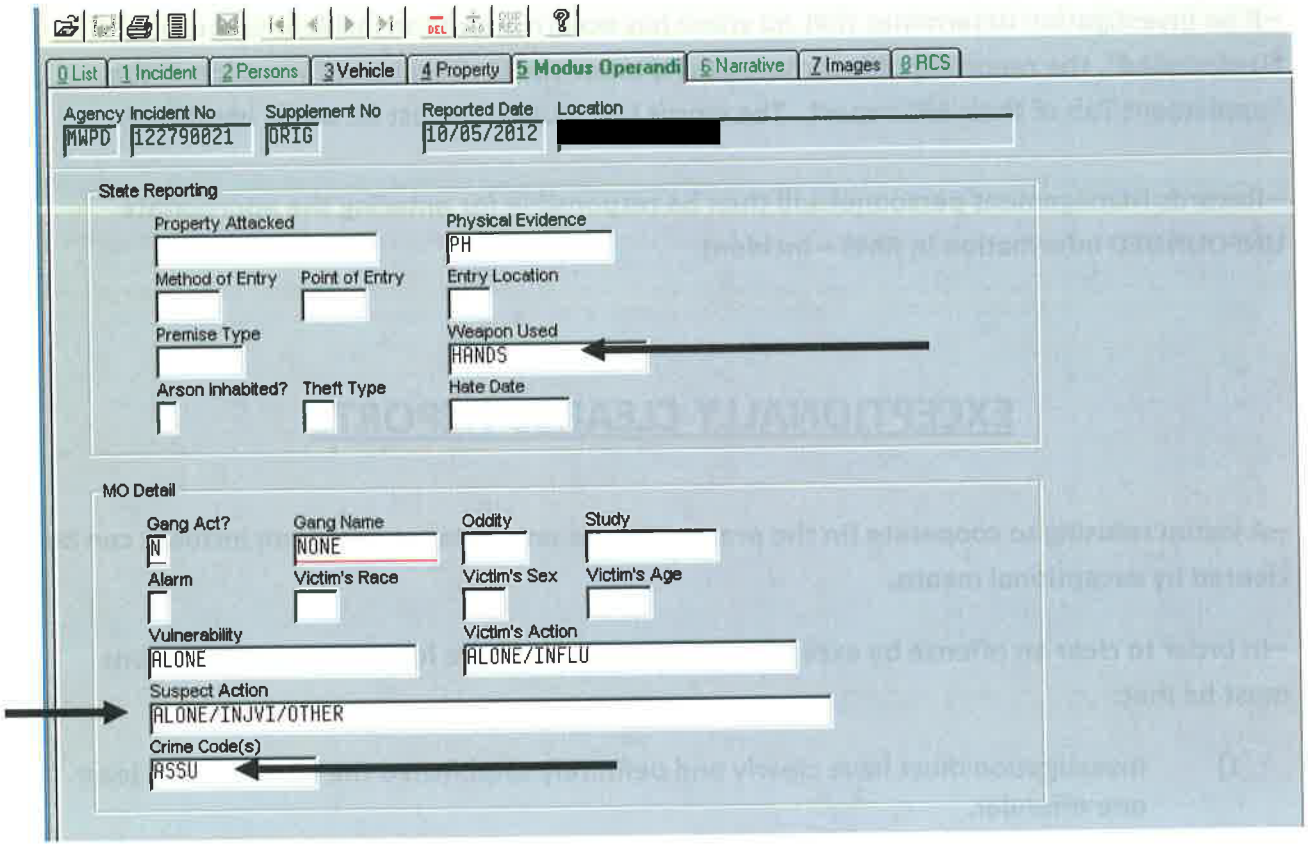


PROPERTY TAB: Cat field

Click in the UCR field and hit the Enter bar twice. This will ensure the correct UCR code has populated.



MODUS OPERANDI TAB: Weapons Used, Suspect Action, Crime Code - These fields are critical.



WEAPONS USED: **This field must contain an entry. If no weapon is used/applicable then "NONE" must be entered.**

SUSPECT ACTION:

Non-Fatal Shootings – Suspect Action must contain SHOOTING (OSHTN) and/or SHOTS FIRED (OSHTS) at a minimum.

CRIME CODE – This field automatically populates from the "initial" Nature of Call. Thereafter, if the Nature of Call is changed, the Crime Code will not repopulate. You must verify that the populated Crime Code is correct.

UNFOUNDED INCIDENTS

–If an investigation determines that no crime has occurred and the incident is considered "Unfounded", the reporting officer must clearly enter the Unfounded Information in the Supplement Tab of their ARS report. The words UNFOUNDED must be easily identified.

–Records Management personnel will then be responsible for entering the appropriate UNFOUNDED information in RMS – Incident.

EXCEPTIONALLY CLEARED REPORTS

–A victim refusing to cooperate (in the prosecution) is one instance where an incident can be cleared by exceptional means.

–In order to clear an offense by exceptional means, each of the following four conditions must be met:

1) Investigation must have clearly and definitely established the identity of at least one offender.
2) Sufficient probable cause must have been developed to support the arrest, charging and prosecution of the offender.
3) The exact location of the offender must be known so that an arrest could be made.
4) There must be a reason outside the control of law enforcement, which prevents the arrest.

If a report requires exceptional clearance the words "VICTIM REFUSED TO COOPERATE" should be entered in the Supplement Tab of the ARS report so that they are easily identified.

Records Management Section personnel will then be responsible for exceptionally clearing the offense in the RMS – Incident module.

LAYERED APPROACH TO PROBLEM SOLVING RECORDS QUESTIONS AND / OR CLARIFICATIONS

Each touch of a report must be done with the utmost care and expertise.

1) **If you are unclear, discuss the report within your group**
2) **Email the CIB QCR or specific subject matter expert for the particular questions:**

NOTE: They are not the "final word" they are there to give guidance on State Statutes – not IBRS

ROBBERY – Lt. Ken GRAMS or Lt. Kirstin WEBB
AGG ASSAULT – Lt. Jeff POINT (District #1 QCR)
SA, DV, CHILD ABUSE – Sgt. Charlene KENNEDY (Sensitive Crimes QCR)
ARSON – Captain Chad WAGNER or Det. Elisabeth WALLICH
AUTO THEFT – Captain Chad Wagner or Sgt. Shannon SEYMER-TABASKA
BURGLARY/THEFT – Det. Anne PORTNOY (Investigative Management QCR)
WHITE COLLAR CRIME (Fraud, etc.) – Det. Cheryl WELCH
NARCOTICS – Lt. Derrick HARRIS

3) **Questions that are not resolved or need further clarification**

Records staff bring the issue to the attention of a Records supervisor.
Records supervisor attempts to resolve and determines if further research/clarification is required.

4) **Records supervisor needing more clarification emails D/I Mary HOERIG and D/I William JESSUP.**

NOTE: Only Records Supervisors should be involved at this step and should ensure that appropriate information is included to allow for thoughtful review.

5) **D/I HOERIG and D/I JESSUP attempt to resolve the question and determine if Greg SWANSON (FBI) should be contacted.**

Only a Records supervisor and OMAP designee is authorized to submit questions to Greg SWANSON for clarification.

INTEGRITY DATABASE GUIDELINES

The database serves as a mechanism to identify report deficiencies, potential trends in reporting and report overall record quality.

- Entries into this database will be for both corrected and non-corrected reports.

- Every entry into the database generates an email to the Officer who authored the report, the Supervisor who approved the report, the work location "primary" QCR and the Commanding Officer.

RECORDS MANAGEMENT REVIEW

√ Records personnel review the report(s) for accuracy and completeness.

√ If the report contains information sufficient that Records personnel can make the appropriate corrections, they will do so.

√ If the information is insufficient the report will be returned to the report author requesting either follow-up information or clarification.

- **No Error Procedure: (NO CORRECTIONS MADE)**

If no error is identified Records personnel "freeze" the record, transfer the record into RMS, validate the record and supplement match the record if applicable.

Records personnel enter information regarding the review into the Data Integrity Database indicating the IR#, report author, approving supervisor, Original IBRS code, Adjusted IBRS code, report type (ORIG or SUPP), and an indication that the report was not in need of correction (No Corrections Made).

NOTE: If the Original IBRS is not changed/corrected, the Original IBRS code and Adjusted IBRS code will be the same.

- **Errors Identified Procedure: (CORRECTIONS NEEDED, CORRECTIONS MADE, FOLLOW-UP NEEDED)**

An error has been identified or there is a need for follow-up (aka service request).

Records personnel leave the ARS report in "UA" (unapproved) status.

In the RCS Tab, Records personnel shall enter the words "Follow-up sent" and then what the follow-up request is for.

Records personnel enter information regarding the review into the Data Integrity Database indicating the IR #, report author, approving supervisor, Original IBRS code, Adjusted IBRS code, report type (ORIG or SUPP), and an indication that the report is either : 1) In need of correction (Corrections Needed); 2) A correction was made by Records personnel (Correction Made) and briefly articulate the correction completed if applicable or 3) There is insufficient information to process the report (Follow-Up needed).

The Data Integrity Database will trigger an email to the author of the report, the supervisor who approved the report, the author's Command Officer and the QCR, indicating the action required or correction made.

Upon receipt of the appropriate correction/follow-up information, Record's personnel will conduct a final review and if no other follow-up is deemed necessary they will freeze and transfer the report, validate the record and supp match if applicable.

QCR'S ROLE

Primary contact between Records Management and their work location.

Responsible for ensuring the quality and accuracy of the reports at their work location.

Serves as a liaison with Records Management personnel.

Assists in training and educating members at their work location on identified areas of concern or deficiency.

APPROPRIATE / INAPPROPRIATE / UNNECESSARY ENTRIES IN DATABASE

When sending follow-up needed or correction needed, please refrain from unnecessary comments, personal opinions or rambling instruction.

+++++ Remember – all database entries are subject to Open Records requests +++++

√ Appropriate entry:

The elements of the crime do not support this offense. Please clarify.

Please add WIF – JONES to Person's Tab.

√ Inappropriate entry:

This is not a theft from person, as the purse was on the ground next to her. It would have had to been on her lap or strapped around her shoulder or in her hands to be a theft from a person.

This should be a burglary, as there was unlawful entry into a building or other structure with the intent to commit a felony or theft. (Other structure by UCR standard definitions include: office, room, railroad car), and since this was large enough of a cargo box to include a desk, computers, etc.... we will think of it as an office or other building or even room.

This would be a burglary, unless he had brought someone up to his room with him after leaving the pub ... which supplement does not state. Do you have any notes regarding this?
If not, please change to burglary from residence. Thank you.

We need to have the supplement have a bit more information... as it stands right now; it appears to be a burglary (the unlawful entry into a building with the intent to commit a felony or a theft). You have it listed as a theft from building (which it cannot be, as this is not a public place or open to many people), but it could be a theft (i.e. by the children's friends). So, could you more or less state which you think it is?

√ Unnecessary entry:

Change in IBRS code from 23B to 23H.

Statute changed from 943.20(1) to 943.20(1)(A)[23A].

You already noted the IBRS code change in the Original and Adjusted IBRS Code drop down menus. It is not necessary to retype the information in the comments.

When changing a "simple" State Statute – it is not necessary to enter this in the comments. Your database entry should simply indicate "Corrections Made". HOWEVER, if the statute change is "GLARINGLY" wrong then it is appropriate to make the entry.

Appendix 6

REDACTED

From: Seymer-Tabaska, Shannon
Sent: Sunday, November 13, 2011 3:59 PM
To: Plant, Joel
Subject: Aggravated Assault audit
Attachments: agg assault2.pptx

Joel,

Historically, there was some discussion regarding how Aggravated Assaults defaulted to a 90Z code in the code table. The code table was corrected in 2009 to have all Aggravated Assaults coded as a 13A as a result of discussion between A/C Hagen, Insp. Hoerig, Captains Pierce/Dubis, Erik R., as well at Drita due to the fact that most RES, ESBUODW...involve weapons.

See attached email that generated disagreement among several individuals. This incident occurred outside of business hours, there were no persons near/around, and the business owner found a few bullet holes in the windows upon his return to resume business in the a.m. I question why this would be a 13A due to the fact that the victim is a business? When I looked at ARS and RMS, in order for MPD to validate the report as a 13A to the state, the owner of the business had to be entered into RMS as a person victim and he wasn't present at the time of the offense.

This happens time and time again with ESBUODW (i.e. shots are fired into unoccupied businesses, vehicles and homes). If there is no person present at the time of the offense, how is it a 13A, crime against person? We have the Crimes Against Society classification which would capture these incidents as 520-Weapon Violations, Group B offenses, rather than Group A offenses.

Lt. Point did contact Derek Veltenheimer from OJA who agreed with the incident being a 520-Weapon Violation.

Due to the internal disagreement, a decision has to be made if we are going to follow the UCR guidelines on the proper reporting of Aggravated Assaults. In Captain Pierce's email response to several individuals, he mentions changing 13A to 520's may artificially reduce the crime numbers, but by going into RMS to force the validation of a crime would indicate we are doing just the opposite.

I have attached the power point for the audit. Hopefully, we can resolve this tomorrow a.m. and if there are changes that will need to be made to the power point, please let me know.

Thank you,
Shannon

From: Spahiu, Drita
Sent: Friday, November 11, 2011 11:34 AM
To: Seymer-Tabaska, Shannon
Subject: FW: In-corrected Agg Assault

fyi

Drita M. Spahiu
Administrative Specialist Senior
Records Management Section
Office: (414) 935-7345
Cell: (414) 235-6426
dspahi@milwaukee.gov

From: Leibold, Kurt
Sent: Thu 11/3/2011 9:33 AM
To: Pierce, Peter
Cc: Spahiu, Drita; Stutt, Eileen; Point, Jeffrey
Subject: Re: In-corrected Agg Assault

This is a 13A.

Sent from my iPad

On Nov 3, 2011, at 9:09 AM, "Pierce, Peter" <PPIERC@milwaukee.gov> wrote:

> I will respectfully disagree. I have found nothing to back Lieutenant Point's assertion and would open us up to being accused of artifically reducing our crime numbers. I would ask that Inspector Leibold provide some guidance on how he feels these types of incidents should be filed.
>
> ---
>
> **From:** Spahiu, Drita
> **Sent:** Thursday, November 03, 2011 8:59 AM
> **To:** Pierce, Peter
> **Cc:** Stutt, Eileen
> **Subject:** FW: In-corrected Agg Assault
>
> Captain Pierce - I did some digging around and determined that this IR is listed in the Excel spreadsheet from the Agg Assault project you had Mary Silvernail work on for you. Please advise if this should be changed back to a 520 or to remain a 13A in RMS.
>
> ---
>
> **From:** Point, Jeffrey
> **Sent:** Saturday, October 29, 2011 12:17 PM
> **To:** Spahiu, Drita
> **Subject:** In-corrected Agg Assault
>
> Drita,
>
> The IR# for the incident that we discussed is 110770044. It was filed as an ESBUODW which properly coded as a 520. It was changed in RMS to a 13A by Mary Silvernail (not Tex as I orginally said- my bad.) It involved shots fired into a closed, unoccupied business with no human victims around (hard to have a crime against a person when there are no persons around!)
>
> Here's what Derek Veitenheimer had to say about this one:
>
> 2. In order for the drive-by shooting to be scored as an Aggravated Assault, people must be in close proximity of the shots fired (not necessarily targeted). My understanding of the rule is that as long as the bullets (stray or targeted) are in close proximity to a person(s), then you have a victim of Aggravated Assault. If shots enter into an unoccupied room and there are no people in close proximity to the shots, then you would have a Weapons Law Violation.
>
> - So for example, if you have a shooting on the street that is directed at one person, but the bullet

strays and hits an unintended house where it passes through a window and hits or nearly hits an individual = Aggravated Assault.

This definitely sounds like a 520=Weapons Law Violation offense, not a 13A=Agg Assault. Shots fired into an unoccupied building should be scored as a Weapons Law Violation.

Jeff Point
Police Lieutenant | Milwaukee Police Department | Neighborhood Policing Bureau- District One
749 W. State St. Milwaukee WI 53233 | 414.935.7212 | jpoint@milwaukee.gov

Appendix 7

Hoerig, Mary

From: Hoerig, Mary
Sent: Tuesday, April 13, 2010 12:02 PM
To: Flynn, Edward; Ray, Monica; Harpole, James; Habeck, Gregory; Liebrecht, Edward
Cc: Hagen, John M (POLICE); Winston, Darryl; Lewis, Deborah; Rasmussen, Erik; Spahiu, Drita; Pal, Judy; Schwartz, Anne
Subject: Revised Violent Crime Audit Report

Chiefs:

The results for the revised violent crime audit as requested by the Chief are listed below. CRD staff pulled a random sampling of 10% of the reports filed in the RMS system by specific crime category.

Each incident report was read to ensure that the narrative (and in some cases the supplementary report) supported the IBRS coding and elements.

Thefts and Auto Thefts are currently being evaluated by Sgt April Hoffman, District Two with CRD and IT assistance

4th Quarter of 2009 Audit Results

Category	Qtr 4 Total	Audited	Correct	In Error	% Accurate
11A - Rape	37	4	4	0	100%
120 - Robbery	933	93	93	0	100%
13A - Agg Assault	716	71	68	3	96%
220 - Burglary	1831	183	183	0	100%
23D - Theft from Bldg	131	13	11	2	85%
200 - Arson	70	7	7	0	100%
Totals	**3718**	**371**	**366**	**5**	99%

Notes:

-The 23D Theft from Buildings in error should have been 220 Burglaries.

-The 13A Agg Assaults in error should have been 520 Weapons Violations. (The wrong State Statute was selected, which lead to the wrong IBR code being entered.)

-Incident reports in error were all corrected during the audit process.

Any questions or additional information needed, please let me know.

Mary Hoerig | Deputy Inspector | Administration Bureau
| Milwaukee Police Department | 749 W. State Street, Milwaukee 53233 | Office 414-935-7369 | Cell 414-339-4961 | mhoer@milwaukee.gov

Effort and courage are not enough without purpose and direction~ John F. Kennedy

Appendix 8

Form PM-9E
11/09

MILWAUKEE POLICE DEPARTMENT
MEMORANDUM

Date: December 3, 2011

TO: Michael BRUNSON
Captain of Police

FR: Iris A. ZIOLKOWSKI
Police Lieutenant

RE: Aggravated Assault in Tiburon per Quarter for 2011

Sir:

District 3 reviewed the Aggravated Assaults in Tiburon for each quarter of 2011. Here are the results of that audit.

1st Quarter of 2011 (1/1 - 3/31) – 107 Aggravated Assaults (18 had to be corrected due to an incorrect WIBRS code).

2nd Quarter of 2011 (4/1 - 6/30) – 169 Aggravated Assaults (12 had to be corrected due to an incorrect WIBRS code).

3rd Quarter of 2011 (7/1 - 9/30) – 194 Aggravated Assaults (30 had to be corrected due to an incorrect WIBRS code).

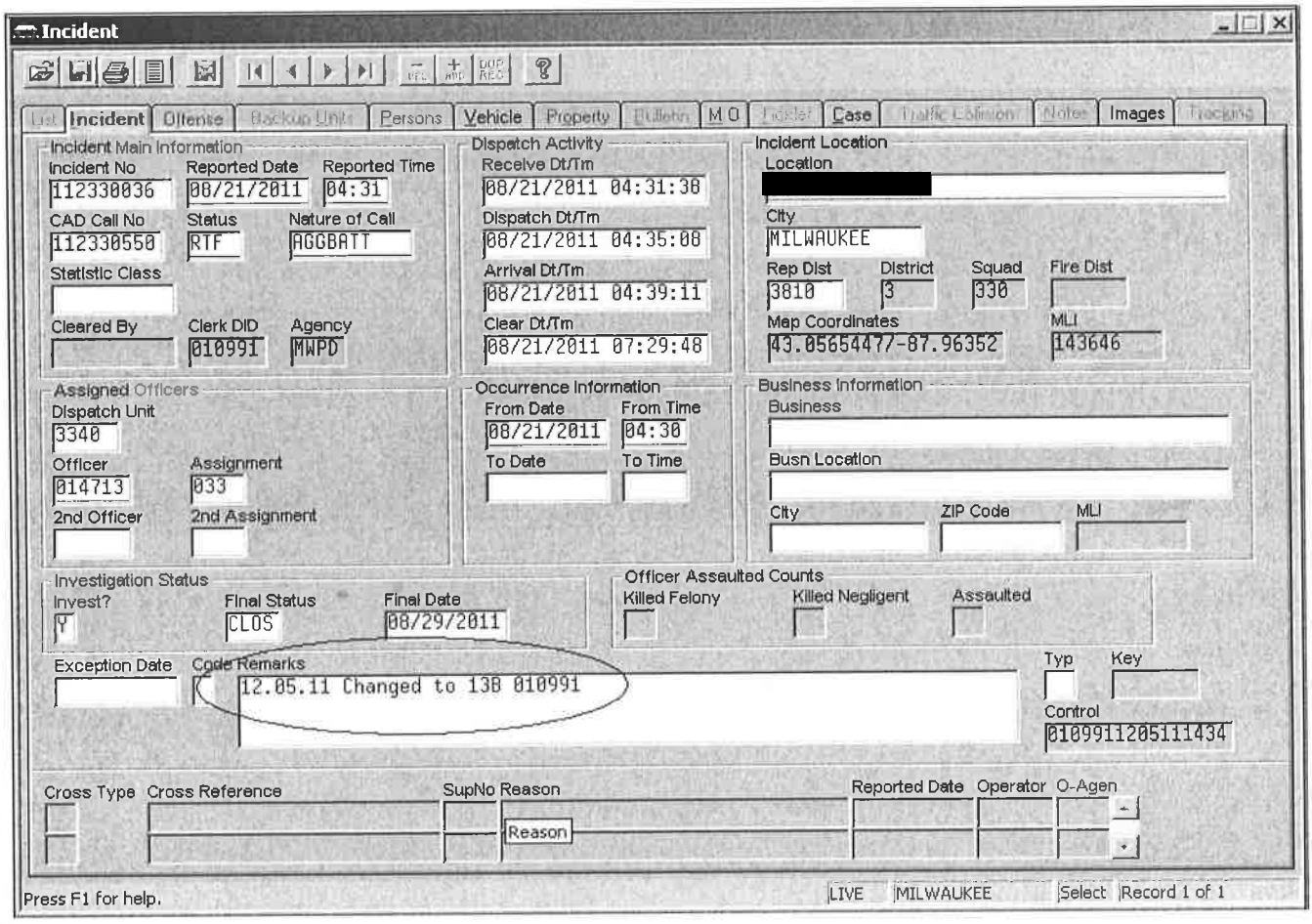
4th Quarter of 2011 (10/1 - 12/31) – 140 Aggravated Assaults (27 had to be corrected due to an incorrect WIBRS code).

Respectfully submitted,

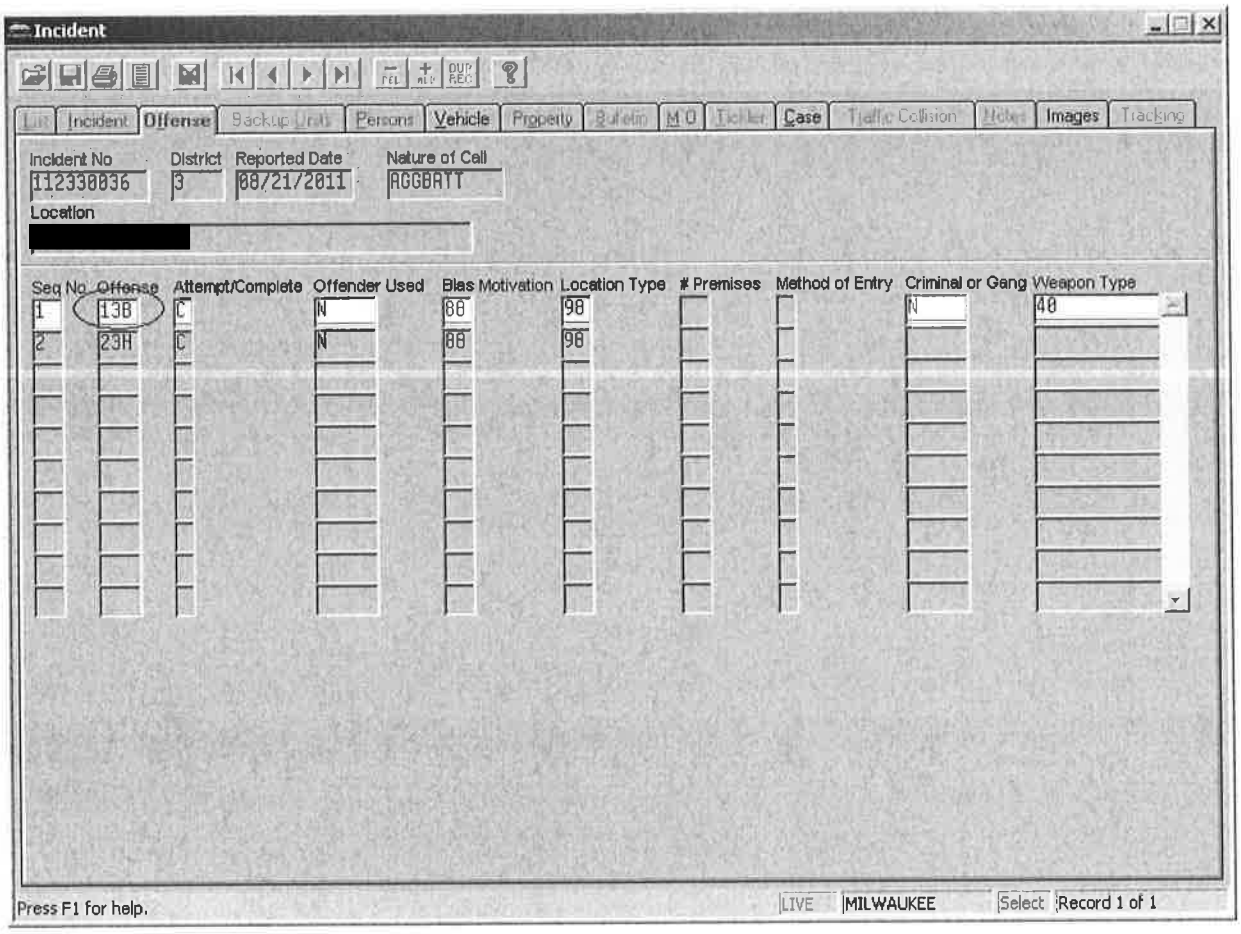
Iris A. ZIOLKOWSKI
Police Lieutenant
District Three - Days

Appendix 9

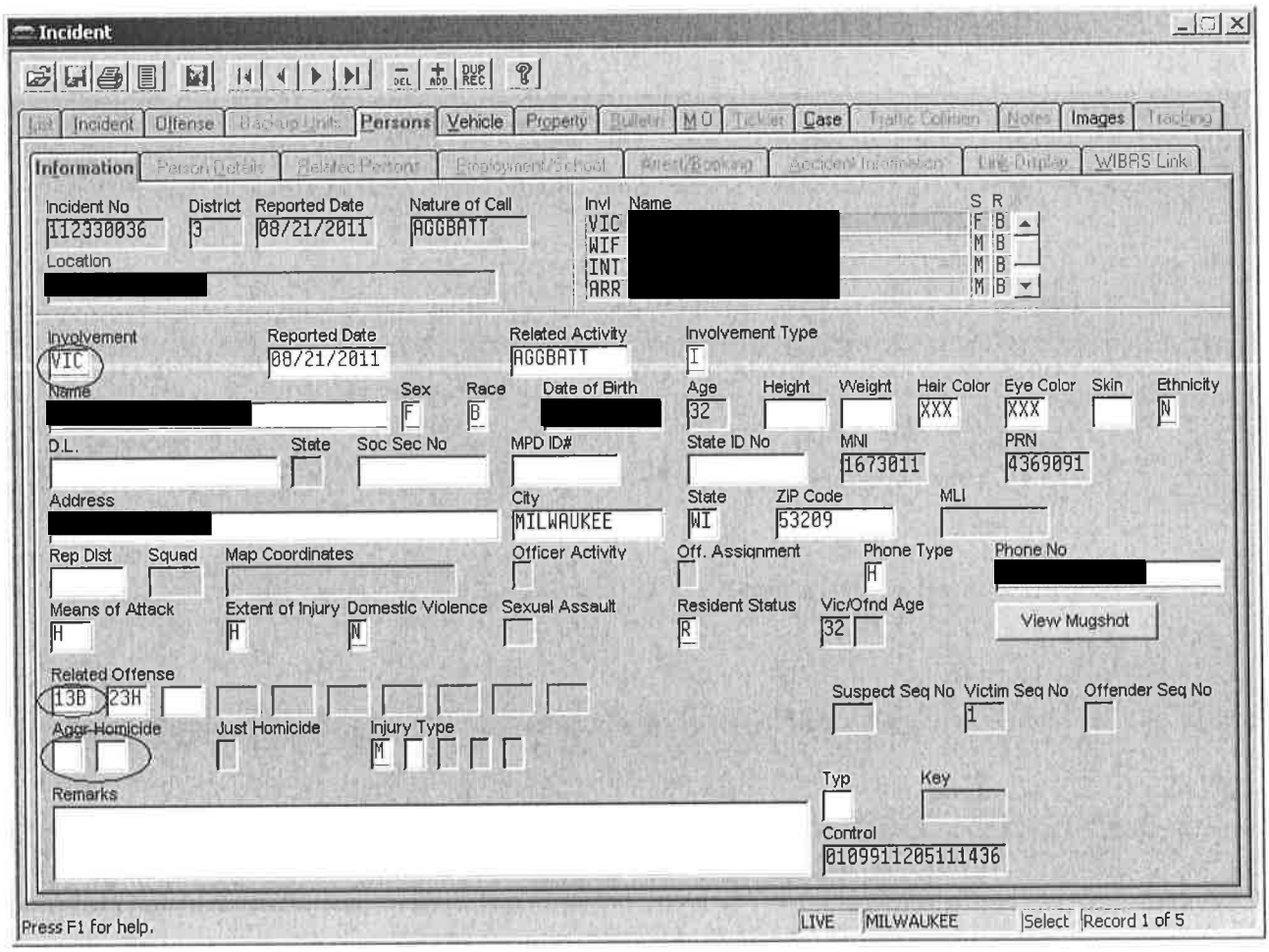
Aggravated assault guide for changes in RMS



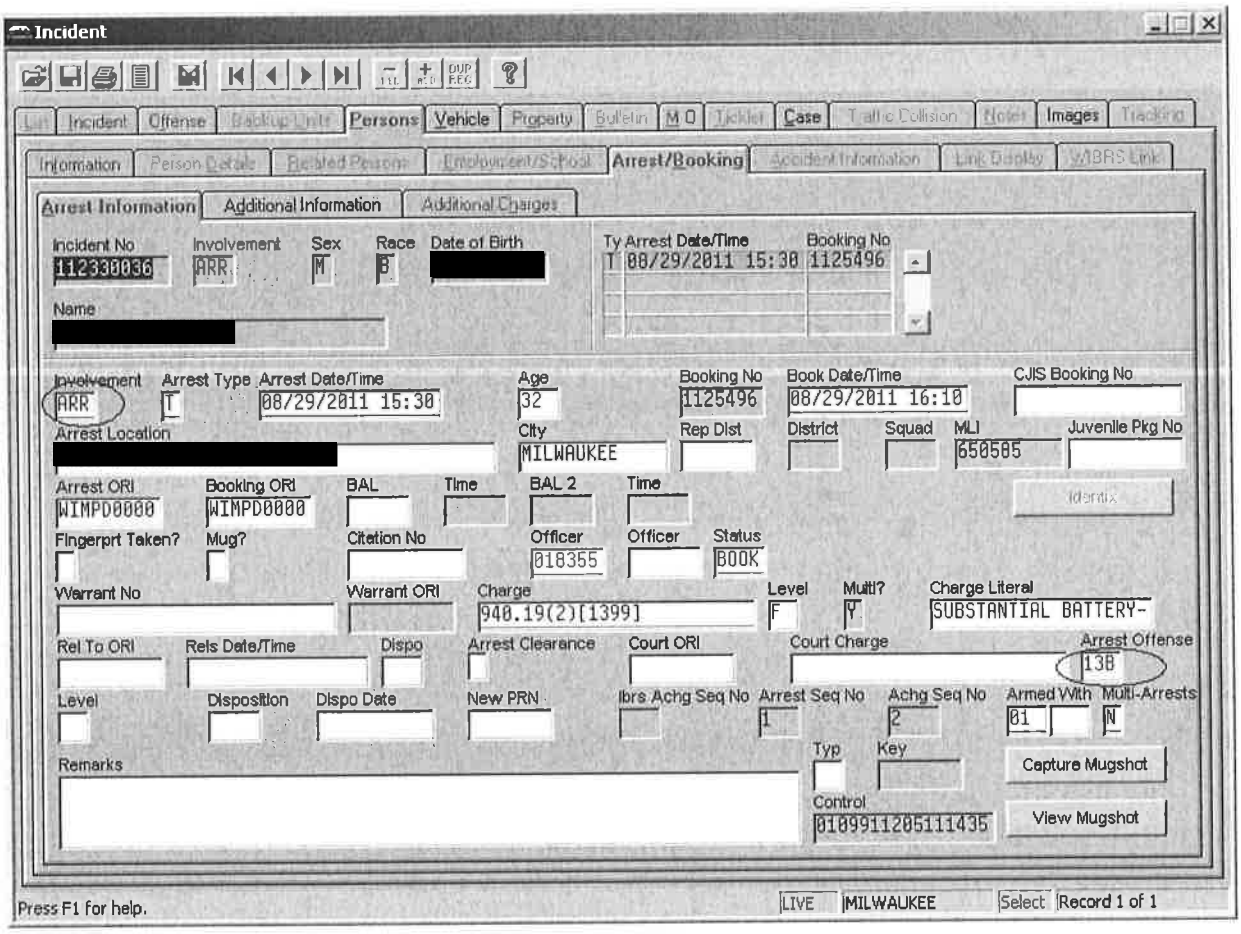
In the remarks box, indicate the date, NIBRS change, and include your PeopleSoft number.



On the offense tab, make your WIBRS change.



On the person's tab under the involvement of victim, make the WIBRS change. If changing from a 13A to a 13B, make sure you remove the codes within the Aggr/Homicide boxes. They must then be blank.



For the arrestee, go to the arrest/booking tab and make the WIBRS change.

Appendix 10

Incident Reports Error Rate

Date Entered From 10/26/2012 To 11/2/2012*

City Wide Error Rate Average:

14.83%

Districts/Divisions	CIB - CID	CIB - Metro	CIB - NID	CIB - SCD	CIB - SID	District 1	District 2	District 3	District 4	District 5	District 6	District 7	NTF
Error Percentage	0.00%	50.00%	0.00%	12.50%	0.00%	22.58%	7.41%	14.56%	16.03%	13.89%	19.19%	16.80%	6.25%
Adjusted Reports	0	1	0	1	0	14	8	15	21	15	19	21	1
Non-Adjusted Reports	12	1	4	7	4	48	100	88	110	93	80	104	15

Souce: Data Integrity Database
This report only displays ORIGINAL reports that were entered into the data integrity database; not all reports written.
*This date is one day added to the end of the date data is extracted from.

29

Appendix 11

1-25-12
200 p-300 p

Close Proximity: Persons in the immediate area of shots fired (i.e. room/vehicle).

Statute#	DESCRIPTION	NIBRS Code
941.20(1)(A)	**ESBUODW**	
	Shots fired from an auto, **NOT** at a person or at an **occupied** vehicle, residence, business or other building where persons are in close proximity of the shots	520
	Shots fired at or into an **unoccupied** vehicle, residence, business or other building	520
	Shots fired by someone on their own property and within 100 yards of a building	520
	Shots fired upon a street, alley, sidewalk, or roadway where the intended target is **NOT** a person, **occupied** residence, vehicle or other building where persons are in close proximity	520
941.20(1)(B)	**Possess Firearm While Intoxicated or Drugged**	520
941.20(1)(C)	**Pointing and/or Aiming a Firearm at another Person**	13A
941.20(1)(D)	**Discharging a firearm within 100 yards of a building, while on another person's property**	520
941.20(1M)(B)	**Pointing and/or Aiming a Firearm absent injury at a LAW ENFORCEMENT OFFICER/ FIRE FIGHTER/ or MEDICAL PERSONNEL**	13A
941.20(2)(A)	**SHOTS FIRED into an occupied vehicle, residence, business or other building where persons are in close proximity of shots fired**	13A
941.20(3)(A)1	**SHOTS FIRED FROM AUTO at a PERSON**	13A
941.20(3)(A)2	**SHOTS FIRED FROM AUTO at an occupied BUILDING (residence/business/other building) or OTHER VEHICLE with persons in close proximity of shots fired**	13A
941.20(3)(D)	**SHOTS FIRED FROM AUTO by DRIVER at another occupied vehicle or building (residence/business/other building) with person's in close proximity**	13A
	OTHER STATUTES	
941.30	**Recklessly Endangering Safety**	
	SHOTS FIRED at a PERSON, NOT at a vehicle	13A
	SHOOTING A PERSON with a firearm; non-life threatening injuries	13A
	Using a **VEHICLE as a WEAPON** to intentionally strike or attempt to strike a person or an **occupied** residence, business or other building where persons are in close proximity	13A
940.19 & 940.20	**Battery**	
940.19(1)	**SHOTS FIRED from a pellet gun or BB gun** (This weapon is identified as a "Dangerous Weapon" by the FBI in NIBRS Reporting)	13A
940.20	(1) Battery to **Prisoner;** (2) Battery to **LEO** or **Firefighter**; (2m) Battery to **Probation/Parole Agents**; (5) Battery to **Technical College District** or **School District Officers and Employees**; (6) Battery to **Public Transit Operator**; (7) Battery to **Emergency Medical Care Providers**	13B

Appendix 12

UNIFORM CRIME REPORTING AUDIT – AGGRAVATED ASSAULTS

MILWAUKEE POLICE DEPARTMENT

NOVEMBER 29, 2011

BE A FORCE.

Uniform Crime Reporting-Data Entry & Reviewers

- ✓CAD Personnel
- ✓ARS (Original) (Reporters)
- ✓CMS Personnel (Bookers)
- ✓RMS Personnel
- ✓District Personnel

Uniform Crime Reporting-Data Flow Process

- ✓ Incident Report Entry
- ✓ Reviewers- Supervisors & CRD Personnel
- ✓ Validation Check
- ✓ WIBRS Test Extract
- ✓ MPD's OJA IBR Software Test Extract
- ✓ Citation Data-Duncan Solutions
- ✓ Import Citation Data into IBR Software
- ✓ Submit Citations/WIBRS Extract to OJA
- ✓ OJA Submits NIBRS file to FBI
- ✓ FBI converts IBR to SBR

Purpose of Audit

- ✓FBI Audit-Spring 2012
- ✓Ensure proper reporting of Group A/Part I offense-Aggravated Assaults
- ✓Identify incorrectly filed Aggravated Assaults (13A)
- ✓Identify process weaknesses of personnel filing/reviewing
- ✓Correct offense codes according to IBRS/NIBRS reporting in RMS

FBI Definition

Aggravated Assault:

✓**Crime Against Persons**

An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

Severe or aggravated bodily injury involve apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Not necessary that injury result, but could result if crime completed.

FBI Definition

Weapon Law Violations: The violation of laws or ordinances prohibiting… the use of firearms…

- ✓**Crime Against Society**
- "A societal prohibition of certain activity"

Not a crime against persons as there is no actual "victim"

Not a crime against property as property is not the real object of the crime

How to File...

YAB Milw. Police Dept.

IBRS-13A
Crimes Against Person

- Substantial Battery
- ESBUODW
  - Point & Aim
  - Occupied residence/auto/business
- 1st & 2nd Degree RES
- Aggravated Battery-Intentional Bodily harm
- Aggravated Battery-Elderly

IBRS-520
Crimes Against Society

- ESBUODW
  - Unoccupied car
  - Unoccupied residence
  - Unoccupied business

  (No persons in close proximity)
- Possession Violations
  - Felon in possession
  - Possession of OC/ other weapons
  - CCW

Examine-Extent of Injury
13A,13B, 90F

- Physical Abuse of a Child
- Strangulation and suffocation
- Battery by Prisoner
- Battery to Law Enforcement Officer
- Battery to Public Transit Operator
- Battery to Injunction Petitioner
- Battery to Emergency Rescue Worker
- Battery to School District Worker

Note: 2010 Audit-Battery to LEO-revealed 87% error rate.
2011-Audit-Battery to LEO- Revealed 85% error rate.

Conduction of Audit

- ✓ Review all 2011 Aggravated Assaults
- ✓ Audit the Four (4) Quarters
  - ✓ Jan 1–March 31st
  - ✓ April 1st–June 30th
  - ✓ July 1st–Sept. 30th
  - ✓ Oct. 1st–Dec. 31st

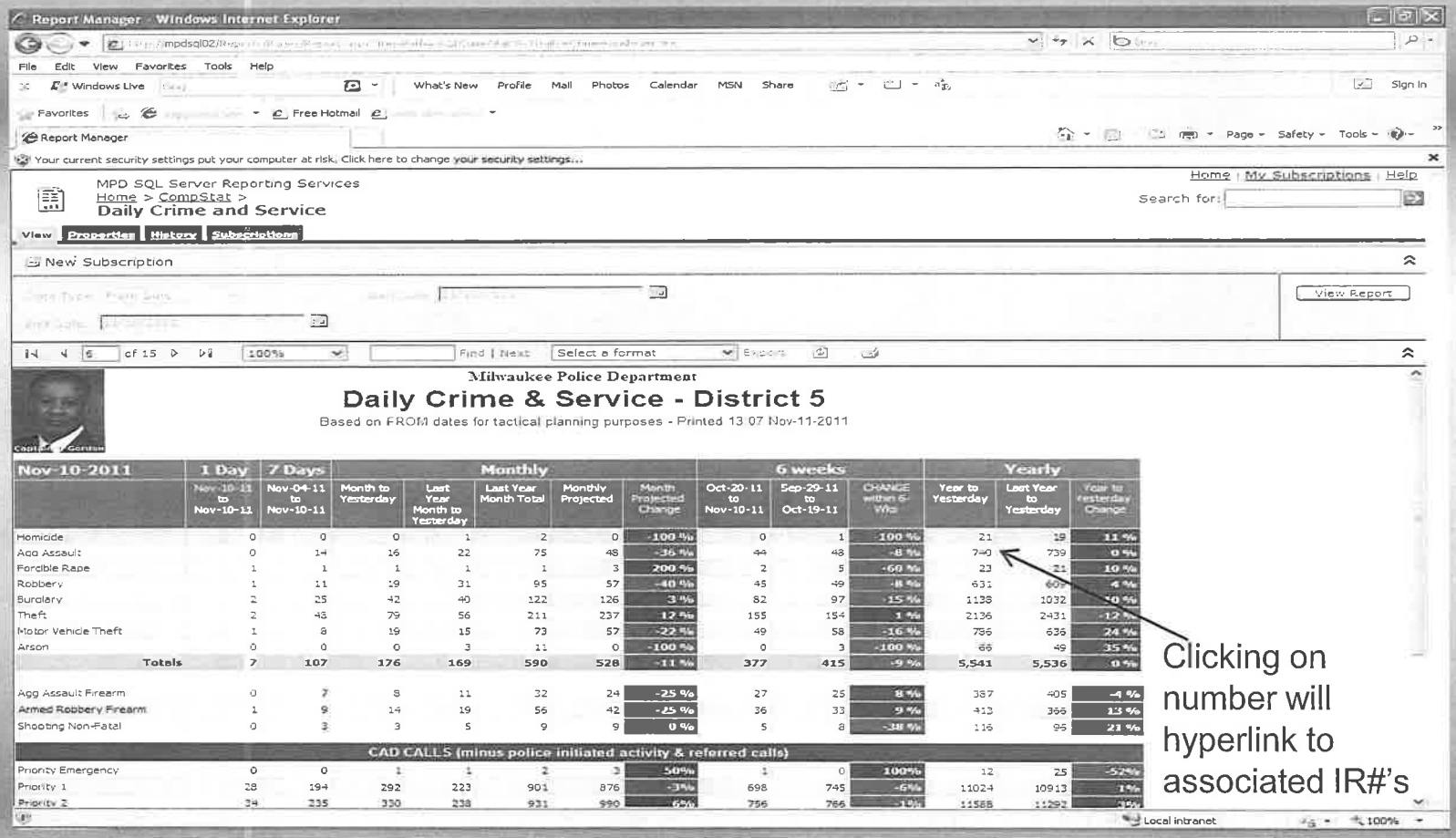
Data Source-DCS Report

SSRS Server-Directives Intranet

- ✓ http://mpdsql02/Reports/Pages/Re...

- ✓ SSRS Server-Directives Intranet-CompStat-Daily Crime & Service

DCS-Daily Crime Statistics Report



Nov-10-2011	1 Day	7 Days	Monthly					6 weeks			Yearly		
	Nov-10-11 to Nov-10-11	Nov-04-11 to Nov-10-11	Month to Yesterday	Last Year Month to Yesterday	Last Year Month Total	Monthly Projected	Month Projected Change	Oct-20-11 to Nov-10-11	Sep-29-11 to Oct-19-11	CHANGE within 6-Wks	Year to Yesterday	Last Year to Yesterday	Year to Yesterday Change
Homicide	0	0	0	1	2	0	-100 %	0	1	-100 %	21	19	11 %
Agg Assault	0	14	16	22	75	48	-36 %	44	48	-8 %	740	739	0 %
Forcible Rape	1	1	1	1	1	3	200 %	2	5	-60 %	23	21	10 %
Robbery	1	11	19	31	95	57	-40 %	45	49	-8 %	631	605	4 %
Burglary	2	25	42	40	122	126	3 %	82	97	-15 %	1138	1032	10 %
Theft	2	48	79	56	211	237	12 %	155	154	1 %	2136	2431	-12 %
Motor Vehicle Theft	1	8	19	15	73	57	-22 %	49	58	-16 %	786	636	24 %
Arson	0	0	0	3	11	0	-100 %	0	3	-100 %	66	49	35 %
Totals	7	107	176	169	590	528	-11 %	377	415	-9 %	5,541	5,536	0 %
Agg Assault Firearm	0	7	8	11	32	24	-25 %	27	25	8 %	387	405	-4 %
Armed Robbery Firearm	1	9	14	19	56	42	-25 %	36	33	9 %	413	366	13 %
Shooting Non-Fatal	0	3	3	5	9	9	0 %	5	8	-38 %	116	95	21 %
CAD CALLS (minus police initiated activity & referred calls)													
Priority Emergency	0	0	1	1	2	3	50%	1	0	100%	12	25	-52%
Priority 1	28	194	292	223	901	876	-3%	698	745	-6%	11024	10913	1%
Priority 2	34	235	330	238	931	990	6%	756	766	-1%	11588	11292	3%

Audit Findings Report- Memorandum

- ✓ Method used
- ✓ Findings of audit-

  By Quarter

  - ✓ N~~umber of CAD Calls~~
  - ✓ Number of reports analyzed
  - ✓ Number (Percentage) Proper filings
  - ✓ Number (Percentage) Improper filings
  - ✓ If errors-note, document and correct

  No Personnel Opinions/ Only Facts

  (**People/Product/Process Errors**)

Audit-Crimes/Clearances

- ✓ Provide audit specifications
- ✓ Audit Completion Date: 02-29-2012
- ✓ Access SSRS resource for data
- ✓ Begin Audit of 2011 Quarters
- ✓ Complete 1 Quarter-Next scheduled meeting December ~~19th~~ 14th.

Appendix 13

Sample Report Correction List Ordered by Reviewing Supervisor's Name

CASE NUMBER	REPORT DATE	OFFICERS NAME	APPROVED BY	DATE CORRECTED	CORRECTIONS TO BE MADE:

Sample Report Correction List Ordered by Officer's Name

CASE NUMBER	REPORT DATE	OFFICERS NAME	APPROVED BY	DATE CORRECTED	CORRECTIONS TO BE MADE:

MONTH/YEAR			
APPROVING SUPERVISORS	# OF ERRORS	# OF REPORTS REVIEWED	RATE
TOTAL OF NUMBER OF REPORTS =			
TOTAL OF NUMBER OF ERRORS =			
ERROR RATE =			