

City of Milwaukee



Audit of the Fire and Police Commission Internal Controls and Processes

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City of Milwaukee, Wisconsin

March 2020

Office of the City Clerk

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March 30, 2020

Honorable Tom Barrett, Mayor
The Members of the Common Council
City of Milwaukee
Milwaukee, WI 53202

Dear Mayor and Council Members:

The attached report summarizes the results of the audit of the Fire and Police Commission internal controls and processes. The scope of the audit included examining internal controls over investigating and monitoring citizen complaints and recruiting, testing and hiring processes from September 2019 through current date.

The audit objectives were to:

1. Evaluate the adequacy of internal controls, policies and procedures over the Fire and Police Commission's processes.
2. Determine whether the FPC investigates complaints:
 - Properly, by investigating complaints within its jurisdiction and closing proper conduct cases immediately when appropriately based on information contain in the complaint.
 - Thoroughly as stipulated in the FPC guidelines for investigation of citizen complaints.
 - Within the timeframe required by guidelines, policy and procedure, Wis. Stat. and City Charter.
3. Evaluate whether the FPC is effectively managed to achieve its mission.

The audit concluded that the controls in place over the FPC processes are adequately designed and are operating effectively. However, some identified controls have a significant or operational deficiency and require improvements to ensure operational efficiency and effectiveness to eliminate the related exposure to risk. This report identifies thirteen recommendations and one observation to address these issues.

Audit findings are discussed in the Audit Conclusions and Recommendations section of this report, and are followed by management's response.

Appreciation is expressed for the cooperation extended to the me by the personnel of the Fire and Police Commission.

Ronda M. Kohlheim

Sincerely,
Ronda M Kohlheim, MBA
Inspector General

I. Audit Scope, Objectives and Methodology

The audit examined the Fire and Police Commission's (FPC) administration of citizen complaint investigations, recruiting, testing and hiring processes; as well as whether the FPC is managed efficiently to meet its mission. The scope of the audit included examining internal controls over processes administered by the FPC. The audit focused on the adequacy of internal controls, policies and procedures, guidelines, Wis. Stat. and Milwaukee Code of Ordinances. The audit period was September 2019 through current date.

The objectives of the audit were to:

1. Evaluate the adequacy of internal controls, policies and procedures over the Fire and Police Commission's processes.
2. Determine whether the FPC investigates citizen complaints:
 - Properly, investigating complaints within its jurisdiction and closing proper conduct cases immediately when appropriately based on information contained in the complaint.
 - Thoroughly as stipulated in the FPC guidelines for investigation of citizen complaints.
 - Within the timeframe required by guidelines, policy and procedure, Wis. Stat. and Milwaukee Code of Ordinances.
3. Evaluate whether the FPC is effectively managed to achieve its mission.

The audit excluded:

1. The FPC's oversight of the Fire and Police department internal policies and procedures.
2. Disciplinary appeals from members of the Fire and Police departments.
3. Disciplinary actions for members of the Fire and Police Departments for misconduct, or rule violation.
4. The FPC's community outreach and education activities.
5. The Office of Emergency Management and Communications.
6. Monitoring and research of the Fire and Police Departments operational initiatives.

The audit was conducted in accordance with generally-accepted government auditing standards. Those standards require that the audit be planned and performed so as to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. I believe that the evidence obtained provides a reasonable basis for the audit's findings and conclusions based on the audit objectives.

Methodology

The audit methodology included developing an understanding of the processes and controls over the FPC. To establish appropriate evaluation criteria for this audit, controls and procedures specific to the investigation and monitoring of citizen complaints and recruiting, testing and hiring for vacancies in the Milwaukee Fire (MFD) and Police Departments (MPD). The procedures also included elements from best-practice criteria. These standards were relevant during audit testing, finding identification, and recommendation development.

The audit procedures developed to evaluate the processes and controls to meet the audit objectives included: process walk-throughs; inspection of relevant control documentation; and the testing of controls as follows:

- Reviewed internal policies, procedures, and guidelines.
- Assessed compliance with s. 62.50, Wis. Stats., and Chapter 314 of the Milwaukee Code of Ordinances.
- Determined whether the FPC investigated citizen complaints within its jurisdiction properly, and appropriately based on information contained in the complaint, as stipulated in the guidelines, and within the required timeframe.
- Reviewed internal controls and processes for recruiting, testing and hiring MFD and MPD vacancies.
- Assessed compliance with the American Civil Liberties Union (ACLU) Settlement Agreement (as it related to citizen complaint investigations)
- Evaluated the organizational structure and development of the FPC.

II. Organization and Fiscal Impact

The Milwaukee Board of Fire and Police Commission, established by Wisconsin state law in 1885, is one of the oldest police oversight agencies in the nation. Originally, the Fire and Police Commission (“the Commission” or FPC) was established to remove fire and police services from the influences of politics. Until that time, in Milwaukee, chiefs of both departments were appointed by the mayor, who used these appointments, and the appointment of police officers, as a form of political patronage. Under the new law, the FPC is now responsible for setting employment standards, testing candidates for positions in the Fire and Police Departments, and appointment of both chiefs. In 1911 and under s. 62.50, Wis. Stats., and Chapter 314 of the Milwaukee Code of Ordinances, the Commission’s authority was expanded to include all aspects of operational oversight of the Fire and Police Departments.



The Commission is comprised of a board of seven part-time citizen commissioners and a full time professional staff led by an executive director. The commissioners and executive director are appointed by the mayor and approved by the Common Council. The Commission’s authority and responsibility, including policy oversight, citizen complaints, disciplinary appeals, Office of the Emergency Management and Communication, and recruiting, testing and hiring are specified in s. 62.50, Wis. Stats., and Chapter 314 the Milwaukee Code of Ordinances. The FPC sets overall policy, while the chiefs of their respective departments manage daily operations and implement commission’s policy direction and goals. The FPC conducts policy reviews of MFD

and MPD operations, appoints and promotes department personnel, and prescribes general policies and standards. The Commission's judicial functions include hearing appeals from departmental disciplinary actions, investigation of citizen complaints filed against department members, and conducting citizen complaint hearings.¹

Recruitment, Testing & Hiring

The Commission has a long standing commitment to ensure the public safety workforce is representative of the Milwaukee community.² The commission approves all appointments made to any position on the police force and in the Fire Department. FPC staff develops and administers a series of assessments including written exams, physical ability and oral board tests, background investigations, and medical, drug, and psychological screenings. Applicants who successfully pass all phases of the hiring process are hired according to their overall score; those applicants are hired in intervals for training classes, while candidates for entry level positions are filled as vacancies occur.



When the Chief of the MFD or MPD position becomes vacant, the Commission determines qualifications, solicits applications, and appoints new chiefs. Chiefs of both departments are hired for four-year terms, and renewable at the Board's discretion³.

¹ 2020 Plan and Budget Summary, City of Milwaukee. Fire and Police Commission pg. 81.

² Fire and Police Commission website, About the Fire and Police Commission, Recruitment and Testing, https://city.milwaukee.gov/fpc/About#.Xl_ozUnsaUk.

³ 2020 Plan and Budget Summary: City of Milwaukee. Fire and Police Communication, pp.85

Citizen Complaints

Citizens can file a complaint directly with the MFD or MPD. However, the FPC has full sovereignty to receive complaints and independently investigate and discipline department employees up to and including termination from employment for acts of misconduct. A person may file a complaint against an employee of either department for specific acts of inappropriate conduct. A complaint can be initiated in writing and in person; by telephone, fax, or e-mail; through the Commission's website; and recognized community referral organizations.



The FPC also monitors complaints filed directly with both departments and reviews their completed investigations. Citizen complaints are assigned to one of two FPC investigators; however, there is currently one investigator/auditor vacancy. The majority of complaints investigated by the FPC are completed within two months from the date of receipt. However, each complaint is unique, so a particular complaint could take significantly more or less time to resolve.

III. Audit Conclusions and Recommendations

The audit evaluated the FPC's administration of internal controls over processes surrounding recruiting, hiring, and testing and citizen complaint investigation activities. These controls, developed and implemented by the Commission provide management with assurance that

processes are performed consistently and comply with statute, policies, procedures and best practice.

The audit concluded that controls in place over the Commission's citizen complaint investigations and recruiting, hiring and testing are adequately designed. However, some identified controls have a significant or operational deficiency and require improvements to ensure operational efficiency and effectiveness to eliminate the related exposure to risk.

This audit report identifies thirteen recommendations and one observation to address these issues.

1. Collaborate with vendors to ensure scoring methodology and testing examination components comply with hiring prerequisites for fire and police positions.
2. Develop and document a detailed, well-defined pre-employment process to ensure medical examinations, psychological evaluations and drug tests comply with applicable federal and state rules and regulations.
3. Revise, implement and document well-defined, comprehensive policies and procedures for recruiting, testing and hiring processes.
4. Streamline recruiting, testing and hiring activities to ensure a stronger, effective and efficient process.
5. Develop, implement and document comprehensive, well-defined policies and procedures governing the investigation of citizen complaints.
6. Identify and establish an MOU, LOU or other agreement with community organizations to disseminate information, and/or provide guidance regarding filing a citizen complaint.
7. The Commission, executive director and staff should work together to revise the rules, guidelines and other applicable material to be consistent with the provisions set forth in the settlement agreement between the City and the American Civil Liberties Union in the case *Collins, et al. v. the City of Milwaukee, et al.*
8. Develop and implement an internal control system to help staff adapt to a shifting environment, evolving demands, changing risks and new priorities.

9. Require the attainment of professional development, training and related continuing education for critical functions.
10. Develop and implement access controls over physical files, systems, applications, and databases.
11. Develop and implement a policy and procedure regarding City-issued cell phone and mobile device management and utilization.
12. Develop and implement a standardized “Business Needs Evaluation, Approval and Deactivation” form.
13. Develop, implement and document comprehensive internal controls and processes to comply with city-wide purchasing policies, procedures, and applicable rules and regulations.

Observation

1. The Council and Mayor should collaborate to address structural issues regarding the Fire and Police Commission’s lack of authority and oversight over the executive director and staff.

A. Recruitment, Hiring and Testing Controls

According to best practice, recruiting a sufficient number of qualified applicants to meet the staffing needs of an agency is the most fundamental human resource process in a fire and police department. The success of recruitment efforts impacts every other function in the agency. The process of attracting potential employees is more complex than merely convincing a large number of individuals to submit an application for employment. To be more effective, agencies must view recruitment in a comprehensive manner; and each agency has its specific system for hiring new employees. The City of Milwaukee’s hiring process includes a written test, a state-mandated physical readiness test, psychological evaluation, an oral interview, a writing sample exercise, and background investigation for MFD and MPD positions. All components of the hiring process must be successfully completed to continue in the selection process and to be placed on the eligibility list; and appointment for those positions are based on the rank order. Each position in the respective departments has its own unique application process. As a condition of employment, the pre-employment components of the hiring process (i.e. medical, drug and psychological screenings) are required for those individuals placed on the eligibility.

Audit testing procedures concluded that the vendor scoring methodology for testing and examination components may not comply with City rules and regulations for fire and police position.

Specifically,

- There is no documented, written internal procedure to ascertain whether test for fire and police positions have been developed and scored, by the vendor, to meet the specific requirements and for the best interest of the City when hiring for fire and police positions.
 - The FPC has not identified whether vendor's scoring of testing components align with specific requirements of the City to continue in the hiring process for fire and police positions.
 - The FPC does not perform monitoring or a periodic review of the vendor's scoring methodology to ensure tests and exams comply with requirements, as applicable and specific to the City of Milwaukee (as applicable).
-

Recommendation 1: Collaborate with vendors to ensure the scoring methodology for testing examination components comply with specific requirements for City of Milwaukee fire and police positions

Although the Executive Director has been in the FPC for less than one year, Management should collaborate with the vendor consultant from Industrial/Organizational (IO) Solutions and Public Safety Solutions (PSI) to ensure that scoring methodologies have been developed to meet specific needs, requirements (as applicable) and best interest for the hiring of firefighters and police officer positions in the City of Milwaukee.

Specifically,

- Document a well-defined, detailed policy and procedure to verify candidate testing scores were calculated according to the City's best interest and criteria.
- Define the job specific score requirements and a detailed example of how the vendor score results are calculated.

- Document the testing components specific to each fire and police department position; and include:
 - The order in which the testing components should occur in the selection process.
 - The purpose of each testing component and what the component is measuring; how it is scored; who calculates the scores; standards and guidelines as applicable per testing component and position.
 - Document and describe in detail the eligibility list process.
Specifically,
 - Creation of the master list; where the list is maintained; the length of time the list can be used and the expiration of the list, etc.
 - The information to be included on the list;
 - The eligibility list approval process;
 - The process for ranking and placing candidates on the list based upon test scores and applicable preference points.
 - Perform periodic reviews of testing and examination scoring to ensure vendor results were scored to meet the needs in the best interest of the City.
-

Pre-Employment

According to the U.S. Equal Employment Opportunity Commission (EEOC), as a general rule, information obtained and requested through the pre-employment process should be limited to those essential for determining whether a person is qualified for a job. In addition, the American Disability Act (ADA) places restrictions on employers when it comes to asking applicants to answer medical questions; take a medical exam; or identify a disability. An employer may not ask an applicant, for example, if he or she has a disability (or about the nature of an obvious disability). An employer also may not ask a job applicant to answer medical questions or take a medical exam before making a job offer. An employer may ask a job applicant whether they can perform the job and how they would perform the job. The law allows an employer to condition a job offer on the applicant answering certain medical questions or successfully passing a medical exam, but only if all new employees in the same job have to answer the same questions or take the same exam. Once a person is hired and has started work, an employer generally can only ask

medical questions or require a medical exam if the employer needs medical documentation to support an employee's request for an accommodation or if the employer has reason to believe an employee would not be able to perform a job successfully or safely because of a medical condition. The law also requires that an employer keeps all medical records and information confidential and in separate medical files.⁴

Audit testing concluded that candidates applying for sworn positions in the MFD and MPD must pass a pre-employment medical examination, psychological evaluation, and drug test as a condition of employment; however, phases in the hiring process are sometimes performed out of sequence to keep the prospective candidate moving through the process. Hence, medical exams, psychological evaluations and drug test are conducted prior to an employment offer. The audit further notes that this process has occurred for an extended amount of time, and prior to the appointment of the current executive director.

Specifically,

- There is no documented, written process disseminating the pre-employment process for medical examinations, psychological evaluations and drug testing and at what point in the process they should be performed.
- Medical examinations, psychological evaluations and drug testing are conducted as a condition of employment; however, they are performed before an employment offer letter is sent, which does not comply with EEOC and ADA pre-employment rules regulations.

Recommendation 2: Develop and document a detailed, well-defined pre-employment process to ensure medical examinations, psychological evaluations and drug tests comply with applicable federal and state rules and regulations.

Management should develop and document a detailed, well-defined formal policy and procedure for the pre-employment process for medical examinations, psychological evaluations and drug

⁴ U.S. Equal Employment Opportunity Commission. Pre-Employment Inquiries and Medical Questions & Examinations; https://www.eeoc.gov/laws/practices/inquiries_medical.cfm.

testing. The process should outline the pre-employment medical examination, psychological evaluation and drug testing for fire and police department positions and ensure they comply with all applicable federal and state rules and regulations. The policies and procedures should:

- State that the pre-employment medical exam, psychological evaluation and drug test are to be administered after a formal offer of employment.
- Document which health care professional(s) to use pre-employment medical exams, drug testing and psychological evaluations; how to establish an appointment as well as which provider to use for each component.
- Communicate medical examinations used to determine employment, shall be specifically related to the essential task for which the candidate is considered.
- Include that the only medical question shall be whether the candidate can presently perform the essential functions of the position safely.
- Document that candidates disqualified is not due to a medical condition that would create a future risk of injury.
- Include detailed information regarding vendors approved to perform per-employment test and evaluations and the process for setting up an appointment specific to each test, exam, or evaluation.
- Define and document the appeal process for a candidate disqualified from appointment to a position for failure to meet the conditions of employment as required for the specific position.
- Document the process for ensuring reasonable accommodations and ensure they are in accordance with federal and state law.
- Define and document the process for determining decision for pre-employment (e.g. medically qualified, conditionally qualified, conditionally disqualified, medically disqualified, disqualified due to drug use, etc.). The procedure should include the process for notifying the applicant.

In addition, policies and procedures should be stored in a centralized location that is easily accessible and should be updated as changes occur to the process

Policies and Procedures

Best practice recommends that a comprehensive recruiting strategy begins with workforce planning or strategic staffing, multi-channel sourcing strategies, developing a recruiting model, processes, structure and methodology on how a company assesses and interviews candidates; especially for key positions driving the hiring process, negotiating and making competitive but equitable compensation packages, on-boarding, new hire assimilation, overall candidate experience and much more. Recruiting is a key element in fostering diversity in any organization. Efforts to reach out to the community and generate interest in working for the MFD or MPD, in addition to mentoring future candidates, are among the most effective means of improving the diversity of the candidate pool entering into the selection process



Comprehensive well-defined, documented policies and procedures should be developed to maintain appropriate controls in accordance with the requirements for hiring candidates to fill vacant positions; they should be made accessible, communicated to all personnel, reviewed and updated as necessary. Thorough policies, procedures and processes establish management's criteria for executing City operations, outline current requirements, interdependencies, risks and controls; and they can help to identify improvement opportunities, as well as serve as an effective training tool for staff. Documented policies and procedures provide oversight into standardized functions, key risks and controls that need to be monitored, simplify risk assessments, risk mitigation and audit efforts. Policies and procedures governing recruiting, testing and hiring for MFD and MPD vacancies are inadequate and lack the specific processes, steps, and actions to ensure consistency in the process to eliminate the risk of disqualifying eligible candidates and to mitigate the City's risk to legal liability and criticism.

Testing concluded that policies and procedures governing recruiting, testing and hiring internal controls and processes should be enhanced to include specific processes, steps and actions to eliminate the risk of excluding or disqualifying qualified candidates.

Particularly,

- Policy and procedures including timelines for vetting processes for fire and police department candidates are not formal, comprehensive, documented or easily accessible.
- There is no formal process in place to identify hiring needs, pools of candidates, locations where recruiting events will take place; the types of events to conduct; or the process to conduct a hiring event; or assessment of the advantages and disadvantages of previous recruitment efforts.
- There is only one individual responsible for identifying and recruiting candidates and overseeing the vetting process; and there is no back-up person to ensure recruiting activities continue in the absence of this person.
- There is no established timeline regarding the length of time it takes MPD to complete background checks for fire and police positions.
- The FPC has limited staff to perform recruitment, testing and hiring job responsibilities; and staff lack formal training in legal framework for Human Resource professionals and testing analysts.
- The time necessary to move through the hiring process is lengthy and sometimes candidates drop out of the hiring process.
- Established class dates have been missed due to lengthy process, lack of recruitment and hiring staff in the FPC, and lack of training and professional development necessary to navigate effectively and efficiently through the process.

Recommendation 3: Revise, implement and document well-defined, comprehensive policies and procedures for recruiting, testing and hiring processes.

Management should revise, implement and document the vetting processes to formalize roles and responsibilities and establish timelines in order to allow the recruiting, testing and hiring process to proceed more precipitously. Management should:

- Revise, document and implement procedures to include all key aspects of the recruiting, testing and hiring processes related to specific MFD and MPD positions; where in the process they should occur; and the process to execute each step specific to positions in the individual departments.
- Develop, document and implement a comprehensive, well-defined process for a promotional exam that requires the expertise of an external rater.
- Collaborate with the MPD to establish a timeframe in which background investigations should be completed; the process should be documented in the policies and procedures.
- Identify a back-up person who has been formally trained to perform recruiting activities in the absence of the recruiter, or to provide assistance when there is a need to ensure there is no interruption in recruitment efforts.

In addition, policies and procedures should be stored in a centralized location that is easily accessible and should be updated as changes occur to the process.

Recommendation 4: Streamline recruiting, testing, and hiring activities to ensure a strong, effective and efficient process.

Recruitment strategies should be tailored to meet the needs of the MFD and MPD, as well as the applicants. Management should streamline and improve recruiting, testing and hiring processes for MFD and MPD to ensure a strong, effective and efficient process.

Management should:

- Consider implementing an on-going application process by accepting applications throughout the year rather than an established open and close application period.

- Consider speeding up the process to ensure that complete and up-to-date information is available to hiring staff at each step in the process, by implementing an automated system for managing the hiring process.
 - Establish an ongoing college/university presence by sponsoring events on campus that allows the recruiter to develop a relationship with students.
 - Sponsor a testing orientation program, for example, to help potential applicants fully understand the testing process, create a junior police academy or a pre-academy, streamline the testing process with more frequent test administrations and faster turnaround times for results, and create a fully interactive website.
 - Reestablish relationships with eligible and qualified candidates who previously fell out of the hiring process.
 - Consider partnerships with military officials, college and high school counselors, community-based organizations, student associations, and other departments internal to the FPC's jurisdiction.
 - Conduct research to better understand the agency, the community, and the results of current and past recruitment efforts. (For example, research should provide the FPC with information to answer the following questions: Who is the ideal candidate? Are the job qualifications really what the department wants? What advertising and other efforts are yielding the best results? What are the department demographics and how do those compare with the community served? What has attracted and kept existing staff? Why do officers leave the agency?).
 - Share resources with nearby agencies to maximize the impact of those assets.
Accomplish through partnerships the improvements that the department cannot achieve in isolation.
-

B. Citizen Complaint Investigation Controls

Policies and Procedures

In accordance with best-practice requirements, management should implement control activities through policies that establish what is expected and in procedures that put policies into action.⁵ Internal controls support a wide variety of goals that are essential to a healthy organization. Comprehensive well-defined, documented policies and procedures should be developed to maintain appropriate controls, in accordance with the requirements of citizen complaint investigations, made accessible, communicated to all personnel, and reviewed and updated as needed. Thorough policies, procedures and processes establish management's criteria for executing City operations, outline current requirements, interdependencies, risks and controls, and they can help to identify improvement opportunities as well as serve as an effective training tool for staff.



Documented policies and procedures provide oversight into standardized functions, key risks and controls that need to be monitored as well as simplifying risk assessments, risk mitigation and audit efforts.

Audit testing procedures concluded that policies, procedures, internal controls and processes governing investigation of citizen complaints should be developed, implemented and documented to include specific steps, actions and processes to mitigate the City's risk to legal liability and criticism and in order to comply with applicable rules and regulation.

⁵ 2013 COSO Framework – Principle 11.

Specifically,

- There are no comprehensive, well-defined documented policies and procedures governing processes for the investigation of citizen complaints.
- There is no formal, documented procedure for acknowledging receipt of a citizen's complaint.
- Complaints are categorized as an informal or formal complaint; however, there is neither a definition nor documented procedure for what constitutes a complaint as informal or formal.
- There is no secondary review of citizen complaints investigated by the FPC investigator prior to the complaint file being submitted to the Executive Director to be referred for resolution.
- There is no procedure to document when a complainant agrees to accept an identified resolution type.
- There is no documented procedure to confirm the complainant understands that they must respond within 30 days if they are not satisfied with the determination, or with any questions or concerns.
- There is no formal, documented procedure to communicate when a personnel interview of an MPD employee should be conducted as well as the completion of Form FPC 58, Compelled Statement. In addition, Form FPC 58, Compelled Statement has not been updated since April 2012.
- There is no documented procedure for when an MPD employee, who is not the target of an investigation, refuses to make a statement, as well as the completion of Form FPC 21, Informing the Member Report. In addition, Form 21, Informing the Member Report has not been updated since July 2009.
- Citizen complaints against an MFD employee are only investigated by the department whether they are received by the MFD or the FPC and are only investigated by the FPC when the complainant is unsatisfied with the outcome.

While the FPC has guidelines for investigation of citizen complaint, they are inadequate and lack the specific steps, actions, procedures and processes to ensure consistency in the process to

mitigate the City's risk of legal liability and criticism as well as to comply with applicable rules and regulations.

Recommendation 5: Develop, implement and document comprehensive, well-defined policies and procedures governing citizen complaint investigations.

To improve the levels of controls over the FPC's investigation of citizen complaints, Management should develop, implement, and document comprehensive, well-defined policies and procedures detailing the specific steps, actions and processes in order to comply with applicable rules and regulation.

Specifically,

- Develop, document and implement well-defined, comprehensive policies and procedures governing the investigation of citizen complaints.
- Document the process by which a complaint is categorized as an informal or formal complaint (e.g. examples of an informal and formal complaint, definition of informal and formal complaint, etc.).
- Document the process for how complaints are assigned to a specific investigators/auditors and how they are tracked.
- Provide a detailed description of the process to complete the citizen complaint checklist, where the checklist is maintained, and the purpose for the checklist.

Intake Investigation Process

- Detail the process for receiving, recording, evaluating and categorizing a complaint regarding a department employee's misconduct.
- Define the process for determining whether an initial complaint meets jurisdictional and other criteria for filing a complaint.
- Detail the process for conducting a preliminary investigation.
- Outline the steps to evaluate evidence, identify and categorize the specific allegations, review and document the complaint to determine whether the minimum filing criteria has been met.

- Document the reason and steps taken to determine the course of action (e.g. referred for citizen board trial; mediation; rapid resolution response complaint inquiry; dual complaint inquiry; review of completed investigations; policy training; dismissal; other actions consistent with law and policy, etc.).
- Document the management review process (in the form of a procedure), the date the file was sent to management, and the date it was referred for resolution to ensure it falls within the 10-day deadline, set forth by the Rules of the Board of FPC, Rule XV, Section 4.
- Document the process (in the form of a procedure) for reviewing citizen complaints investigated by the MPD, include how often they are reviewed.
- Document the step-by-step instructions for gathering data to analyze, monitor and audit citizen complaints to ensure a fair and consistent process.
- Implement a process for providing a status update for complaints that takes an extended period of time to investigate.
- Implement a process to ensure secondary review of citizen complaints before the complaint file is submitted to the Executive director for the recommended resolution type.
- Develop, document and implement the process when the complainant agrees to accept a recommended resolution type.
- Develop, document and implement a process to confirm the complainant has been informed they must respond within 30 if they are not satisfied with the determination, or with any questions or concerns
- Develop and implement a confirmation/acknowledgement letter confirming receipt of a citizen complaint within five to seven business days from the receipt date.
- Document and implement the steps for creating an initial file in the Administrative Investigation Management system (AIM), which includes checking the AIM to determine whether the complaint was also filed with the respective department.
- Document the process (in the form of a procedure) for determining whether the complaint falls within the established filing guidelines.

- Review and revise forms FPC 21 Informing the Member Report and FPC 58 Compelled Statement to ensure each form is comprehensive and in compliance with applicable policies, procedures, rules and regulations.
- Document a detailed procedure for tracking citizen complaint investigations from inception to completion.
- Document the process (in the form of procedures) for determining whether a complaint is classified as a minor misconduct or major rule violation complaint (e.g. minor misconduct and major rule violation, definition of minor misconduct and major rule violation, etc.).
- Create a standardized denial or rejection letter, include the reasons why the letter should be sent, the timeframe in which it should be sent to the complainant, retention of copies, where copies are maintained, etc.
- Develop, document and implement procedures to define the process for FPC investigators/auditors to perform the investigation of citizen complaints received by the FPC.

In addition, policies and procedures should be stored in a centralized location that is easily accessible and should be updated as changes to the process occurs.

Memorandum of Understanding (MOU) or Letter of Understanding (LOU)

A memorandum of understanding (MOU) or letter of understanding (LOU) is a written agreement between two organizations to establish the ground rules for any partnership activities. A well-executed MOU or LOU includes details, guidelines, length of time, point of contact, required training, the announcement of the partnership, etc. It should outline what each organization agrees to contribute to the partnership, a timeframe for delivering the desired outcomes and details of how each party will collaborate (e.g., regular in-person meetings, conference calls, written approval of all activities by both parties). An MOU or LOU is like a contract that defines the way two organizations will work together. While they are technically legally binding, consider these documents a tool to facilitate the partnership, and ensure a smooth working relationship.



Testing results suggested that the FPC does not have an established MOU, LOU or formal working relationship with organizations in the community; previously established relationships are outdated; there has been no recent communication; and a designated point of contact for previously established relationships have not been identified. Such organizations, if they exist, could be disseminating outdated or inaccurate information about the FPC, MFD and MPD investigation of citizen complaints processes.

Particularly,

- The FPC does not have an established, formal MOU, LOU, partnership or agreement with any organization in the community to disseminate information regarding the citizen complaint process.
- There are no documented policies and procedures for establishing a formal MOU, LOU, partnership or agreement with organizations in the community that will assist with communicating information about the citizen complaint investigation process.
- The FPC has no knowledge of which community organizations were previously established to provide information to citizens regarding the process for filing a complaint against a member of the MFD or MPD.
- There is no documented process in place detailing the steps for establishing a working relationship with a community referring organization.
- Community organizations providing information regarding filing a citizen complaint are not formally trained on the process.

- An accurate list of community referring organizations is not indicated on the FPC's website or printed materials.
 - The FPC has not had any recent contact with community organizations and does not have a designated point of contact for each organization.
-

Recommendation 6: Identify and establish an MOU, LOU or other agreement with community organizations to disseminate information, and/or provide guidance regarding filing a citizen complaint.

Management should identify and establish a formal, documented MOU, LOU, or partnership agreement with community organizations that will disseminate information or provide citizens with guidance regarding filing citizen complaint against a member of the MFD or MPD.

Specifically,

- Develop a policy and procedure detailing the process for establishing a partnership agreement, memorandum or letter of understanding.
- Identify organizations in the community which will disseminate information regarding filing a citizen complaint against a member of the MFD or MPD; designated a point of contact for each community referring organization.
- Provide initial and ongoing training to members of the community organization(s) who will distribute information and provide guidance to citizens inquiring about the process. Training should occur at least annually or the process changes.
- Ensure community referring organizations have current, comprehensive knowledge and an understanding of the citizen complaint process.
- Ensure community referring organizations are kept abreast of any changes and revisions to the process and documentation relating to complaint (e.g. brochures, complaint, forms, etc.).
- Develop a procedure for community referring organizations to keep a log of citizens who complete, inquire, request guidance or assistance regarding filing a citizen complaint against a member of the MFD or MPD.

- Establish a procedure for FPC investigators and community referring organization staff involved in the complaints process to have regularly-scheduled meetings; meetings should be documented as verification that a meeting took place.
 - Develop a sign-off process for the community referring organization staff as confirmation of training and agreement to abide by the guidelines as stipulated in the MOU, LOU, partnership agreement and as defined by the rules, state statutes and code of ordinances.
-

Rules of the Board of FPC / Investigation Intake Guidelines

The American Civil Liberties Union (ACLU), the ACLU of Wisconsin, and the law firm of Covington & Burling LLP filed a class-action lawsuit against the City of Milwaukee over the MPD's vast and unconstitutional stop-and-frisk program and in July 2018, a Settlement Agreement was approved. The U.S. District Court for the Eastern District of Wisconsin entered an order adopting the Settlement Agreement. The agreement requires the MPD and the FPC to:

- Change policies regarding stops and frisks;
- Document every stop and frisk conducted by officers, the reason for the encounter, and related demographic information, regardless of the outcome of the stop;
- Improve training, supervision, and auditing of officers on stop and frisk and racial profiling issues, and provide for discipline of officers who conduct improper stops or fail to document those stops;
- Release stop-and-frisk data regularly to the public;
- Expand and improve the process for the public to file complaints against police officers;
- Maintain the Milwaukee Community Collaborative Committee, which will seek community input policing strategies and their impact on the public to improve trust between law enforcement and city residents, and seek diverse representation on the committee; and
- Use an independent consultant to evaluate whether the city, the police department, and the Fire and Police Commission are making sufficient progress in implementing the reforms and identifying and correcting unlawful stops and frisks.

The Settlement Agreement is to remain in force for at least the next five years and is being monitored by Plaintiffs' counsel.⁶



Testing of audit procedures concluded that the Rules of the Board of FPC and the Citizen Complaint Intake Investigations Guidelines are inconsistent with certain requirements stipulated in the ACLU Settlement Agreement.

Particularly,

- The ACLU instructs the FPC to no longer require a citizen complaint to be notarized prior to submission of an investigation; however, the Rules of the Board of FPC and the Citizens Complaint Intake Investigation Guidelines indicate the Citizen Complaint form must be notarized before the FPC can accept jurisdiction.
- The FPC does not keep a list of all complaints against individual officers or provide the chief of police with information relating to officers who receive three or more complaints within 90-days or a rolling one-year period; however, per the Settlement Agreement, the FPC should retain such a list and provide the chief of police with the information.
- Internal complaints investigated by MPD are not reviewed by the FPC unless the complainant is unsatisfied with the results of the investigation. Under the agreement, the FPC is to review all internal complaints relating to MPD, and conduct and maintain a separate database to track such complaints.
- The MPD does not have an established email address included on its website or printed materials. The ACLU agreement, instructed the FPC to direct the MPD to

⁶ Collins ET AL. V. The City of Milwaukee ET AL. <https://www.aclu.org/cases/collins-et-al-v-city-milwaukee-et-al>.

establish and include an email address on its website and all its printed material for citizen complaints.

- The FPC does not audit all complaints submitted by members of the public to the MPD to ensure that those responsible properly investigate complaints.

Recommendation 7: The Commission, executive director and investigation staff should work together to revise the rules, guidelines and other applicable material to be consistent with the provisions set forth in the settlement between the City and the American Civil Liberties Union in the case *Collins, et al. v. the City of Milwaukee, et al.*

To ensure compliance with the requirements set forth in the ACLU Settlement Agreement, Management and FPC investigators/auditors should collaborate with the Commission to revise, document and implement the rules, guidelines and other applicable materials related to citizen complaint investigations.

Specifically,

- Revise the rules and the guidelines to remove any verbiage requiring a citizen complaint investigation form to be notarized prior to the start of an investigation. In addition, the revisions should include a statement that verification of identification may be requested at a later time.
- Create a database to track complaints of misconduct against individual police officers who receive three or more complaints within a 90-day period or within a rolling one-year period.
- Implement a process and document it in the form of a procedure to review all complaints relating to MPD conduct and track the complaints in a database other than the Administrative Investigation Management (AIM) system administered by the MPD.
- Instruct the MPD to establish an email address for citizens to submit complaints. (Ah-ha! This must be added to the above.) In addition, the email address should be posted on the MPDs website and printed materials related to citizen complaints.

- Develop, implement, and document a procedure to audit data, dashboard camera footage, and body camera footage on all traffic stops, field interviews, no-action encounters, frisks, and searches every six months.
 - Develop, implement and document a procedure to conduct an audit of complaints submitted by the members of the public to both FPC and MPD to ensure that the those responsible properly investigated the complaint.
-

C. Organizational Structure and Professional Development

In accordance with best practice requirements, changes in management and personnel; new product or service initiatives; technological advances; regulatory adjustments; and increasing competition in the marketplace: each factor, or a combination of factors, can mean the difference between a vibrant, competitive organization and a dysfunctional one. Authority for decision making must be clearly delineated in the organizational structure; work flows must be constructed based on employee skill sets and job duties; communication channels must allow for quick decisions and collaboration; and reward structures must encourage high performance at every level of the organization. Achieving the proper balance is context specific: what works for one company might be wholly inadequate for another. Management consultancy Oliver Wyman observes that while discussions of organizational design tend towards the theoretical/academic, there are a few concrete questions that management must ask throughout the organizational design process:⁷

1. What changes will the new strategy require in the organization's core work? How will tasks be modified? Will there be new constraints, resources, processes or technologies involved?
2. Do the organization's people have the skills, interest, characteristics, and capacity to perform the required work in a manner consistent with the strategy?

⁷ Taken verbatim from the original. See: "Strategic Organization Design: An Integrated Approach." Oliver Wyman, 1998, p. 6-7. http://www.oliverwyman.com/ow/pdf_files/Strategic_Org_Design_INS.pdf

3. Are values, beliefs, behavior patterns, and leadership styles associated with the culture - or informal organization - likely to aid or hinder the performance of the new work?
4. How will the explicit structures and processes that make up the formal organizational arrangements affect the new work requirements?

Answering those questions requires a multi-step process to account for current competencies, work flows, and reporting structures (among others); identify areas in need of reorganization to achieve strategic objectives; identify how those areas should be reorganized; and implement the new organizational design. In its simplest form, the process involves the following four steps: Preliminary Analysis, Strategic Design, Operational Design, and Implementation.⁸

Phase I: Preliminary Analysis

Conduct structured interviews to:

- Identify strengths and weaknesses of the existing organization.
- Clarify issues related to business strategy and organizational design.

Phase II: Strategic Organization Design

- *Design Criteria:* Review information from the preliminary analysis and generate criteria for a new design
- *Grouping:* Generate several design options and evaluate against criteria
 - Grouping by Output - Product, Service, or Project
 - Grouping by Activity - Function, Work Process, Knowledge or Skill
 - Grouping by Customer - Market Segment, Customer Need, or Geography
- *Linking:* Identify information flow requirements, select ways to facilitate the flow of information to meet the requirements, and evaluate against the criteria.
- *Impact Analysis:* Analyze each option to determine feasibility given the existing leadership skills, power relationships, and work environment.

Phase III: Operational Design

- Carry out the operational homework necessary to put the organizational design decision in place.

⁸ Ibid, p. 11.

- Design work charters, reporting relationships, information flows, etc.

Phase IV: Implementation

- Develop a strategy for implementing new design
- Assess the potential resistance to the new organization
- Determine the best way to manage the transition from the old organization to the new.

The functional structure organizes employees by major job function/activity, with functional units typically falling under defined categories. While there are many critical business decisions to make with changes to the organizational structure, it can be easy to overlook one of the most important aspect of the organization – the people performing the task. Best practice suggests, while making changes to an organization, reflect on the resources necessary to provide staff with the required training and development in order for them to succeed in their roles and responsibilities. In addition, best practice indicates that the only asset an organization has that appreciates over time is its employees. Businesses that understand this fact are the most successful because they know the advantages of having knowledgeable, experienced, and highly-skilled staff and are willing to invest in their growth. In addition, organizations with an aligned and focused approach to training, that offer employee development tied to corporate strategic goals and measureable results, are not only more successful, they have a lower turnover rate. No matter the type of business, there's no disputing the value of providing employees with continuing training and growth opportunities.



According to HR manager Harry Conley, the organizational structure is how employees are grouped together. It is designed by the department head, a direct manager, or any other person in charge of a business and is specifically created to improve the productivity of the business. Ideally, this means that employees can work together, share resources and communicate without being unproductive; however, this is often not the case. It is important that management has an understanding that all of this comes with some trade-offs. The decision on the organizational structure is an important one and it shouldn't be taken lightly; it will determine how people interact and how they work together.⁹

Audit testing concluded that the organizational structure governing continuity of operations, attainment of training, professional certification, and related continuing education should be enhanced in order to meet the vision, needs and strategic goals of the FPC to mitigate the City's risk of legal liability and criticism, and in order to comply with applicable rules and regulations.

Specifically,

- The current FPC Executive Director (ED) has been operating in the position for less than one year and has not had an opportunity to develop an overall understanding of the role and responsibility of the position, as well as restructure the department to operate in a more efficient and effective capacity that is aligned with the FPC's mission and goals.
- Various job titles have been informally reclassified; undocumented job descriptions; and are not found within the Salary and Positions Ordinances.
- There is no formal, documented succession plan for critical processes within the FPC.
- The FPC has experienced a delay or suspension in critical operations due to both voluntary and involuntary separations from employment and temporary medical leaves.
- The risk manager and risk auditor roles and responsibilities are inconsistent with those approved by the Finance and Personnel Committee on July 19, 2018.
- Communication and direction from management varies among staff performing the same or similar job functions.

⁹ Conley, Harry: How Organizational Structure Affects Business Productivity (05.30.19), <https://www.cxservice360.com>.

- There is a lack of consensus and understanding regarding some management and staff positions as to their respective roles and responsibilities.
 - The department has struggled to retain staff to perform the day-to-day operations for critical operations. Since September 2019, the FPC has incurred a loss of staff due to temporary leave, involuntary and voluntary departures totaling ten full-time employees: Specifically,
 - Four staff members resigned from their position;
 - Three FPC employees were terminated;
 - Three employees elected to take a temporary medical leave; and
 - Additionally, since the audit, another staff has resigned, one has transferred to another City department, and another is scheduled to transfer.
 - FPC management and staff are overwhelmed with expectations of conducting business operations as normal with limited or no staff in critical positions to perform the job specific roles and responsibilities.
-

Recommendation 8: Develop and implement an internal control system to help staff adapt to a shifting environment, evolving demands, changing risks, and new priorities.

Management should improve its overall governance in order to meet the vision, needs, and strategic goals of the FPC to mitigate the City’s risk of legal liability as well as public criticism, and in order to comply with applicable rules and regulation.

- Develop and implement formal, comprehensive, well-defined succession plans, using established best practices, submit them to approving authorities for consideration and approval; review and update them consistently; and keep them on record as necessary.
- Strengthen the FPC’s oversight by clearly defining its role and responsibilities regarding decisions and continuing to evaluate the organizational structure as well as improving how decisions are made and communicated to staff to ensure consistent direction and communication.
- Coordinate with the Department of Employee Relations to properly reclassify positions for compliance with the Salary and Positions Ordinances.

- Continue to develop the risk management program by ensuring the Risk Manager and Risk Auditor roles and responsibilities are consistent with those approved by the Finance and Personnel Committee on July 19, 2018 (see Appendix 1).
 - Develop, document, and implement a staff retention policy. The Commission should conduct timely exit interviews and perform periodic analysis of staff turnover.
 - Approach workforce planning strategically, basing decisions on mission needs, citizen expectations, workload, and skills and competencies of staff. Strategies should avoid excess organizational layers and redundant operations, and maintain a balance between supervisory and non-supervisory positions.
 - Establish a climate of openness that encourages the free flow of communication in all directions that:
 - Informs employees of their duties and responsibilities;
 - Reports sensitive matters, such as changes in leadership, the organizational structure, etc.
 - Enables employees to offer suggestions for improvement;
 - Provides the information necessary for all employees to carry out their responsibilities effectively; and
 - Conveys top management's message that internal control responsibilities are important and should be taken seriously.
 - Identify and resolve specific communication issues between management and staff.
 - Develop, document, and implement a strategy promoting ongoing feedback to employees and identify steps to improve employee performance and the value of feedback employees receive.
-

Professional Development and training

Professional development and training are ways of improving the effectiveness of the current workforce, but they are also attractive benefits for ambitious people. Training isn't just important to any company, it is vital. Although there are many categories of professional development and training such as management training, there are general benefits to be realized from virtually any type of education program or policy a company undertakes.

It is beneficial to both the company and employees will realize include:

- Improved productivity and adherence to quality standards.
- Employees develop skill sets that allow them undertake a greater variety of work.
- Improved ability to implement and realize specific goals outlined in a company's business plan.
- Increased ability to respond effectively to change.

Productivity usually increases when a company implements training courses. Training across the workforce, from the shop floor to executive level and in any discipline, improves:

- Competitiveness
- Morale
- Profitability
- Customer satisfaction
- Market share
- Company reputation and profile

It can also lead to reductions in:

- Inefficient use of time and materials
- Workplace accidents
- Maintenance costs of equipment
- Staff turnover and absenteeism
- Recruitment expenses

They also make a company more attractive to potential new recruits who seek to improve their skills and the opportunities associated with those new skills. The lack of a training strategy to a potential top candidate suggests that the company will fail to meet his or her own aspirations, leading to a lack of ambitious candidates.

A professional development and training strategy involves the systematic training and improvement of people within the organization so that employees and the company, can achieve their objectives and both personal and corporate goals.

Testing of audit procedures concluded that the organizational structure governing completion of training, professional certification, and related continuing education is lacking and should be enhanced in order to meet the vision, needs and strategic goals of the FPC to mitigate the City's risk of legal liability and criticism and in order to comply with applicable rules and regulations.

Specifically,

- Staff performing job specific tasks lack the required skills, knowledge and training to effectively and efficiently perform the job task.
- The FPC has limited staff to perform recruiting, testing, and hiring job responsibilities; and staff lacks the required, formal training in the legal framework for human resource professionals and testing analysts.
- The current FPC investigator/auditor has not been trained on the various steps for some of the complaint category types; and staff well-versed on the complete process have since separated employment with the City.

Recommendation 9: Require the attainment of professional development, training and related continuing education for critical functions.

Management should require the completion of training, professional certifications, and related continuous professional education for positions within the FPC that require them.

Specifically,

- Develop functional and technical documentation that will aid the FPC in cross-training staff to perform key processes and eliminate single points of failure by ensuring staff members are fully trained and assigned as backups to key processes within the FPC.
- Require and provide initial and ongoing training and development for the risk manager, risk auditor, and investigators/auditors involved with citizen complaints and risk management processes.

By joining associations such as:

- Public Risk Management Association (PRIMA)
- Center for Public Safety Management (CPSM)

- The Risk Management Society (RIMS)
 - National Internal Affairs Investigators Association
 - Legal and Liability Risk Management Institute
 - Require and provide necessary resources to the recruiter, human resource analyst senior, human resource representative and all other staff involved with recruitment, testing and hiring for positions in the fire and police department with formal training on the legal framework for human resources development
 - Require and provide training for all staff involved in testing roles and responsibilities to attend training in the following:
 - Job Analysis
 - Talent Acquisition
 - Validation Principles
 - Test Development
 - Assessment Tools and Approaches
 - Require and provide training so that staff involved in human resources roles become thoroughly familiar with the EEOC's Uniform Guidelines on Employee Selection Procedures.
 - Require and provide the recruiter, human resource analyst senior and human resource representative to attending ongoing training by joining human resources associations or organizations, such as:
 - International Public Management Association for Human Resources (IPMA-HR)
 - International Personnel Assessment Council (IPAC)
 - Great Lakes Employment Assessment Network (GLEAN, a Chapter of IPAC)
 - Society of Human Resource Management (SHRM)
 - Society for Industrial and Organizational Psychology (SIOP)
-

Access Controls

In accordance with best practice and the Privacy Act of 1974, an agency that maintains a system of records shall establish appropriate administrative, technical and physical safeguards to ensure the security and confidentiality of records; and to protect against any anticipated threats or

hazards to their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained. Physical controls and accountability reduce the risk of potentially undetected theft and loss. Access controls improve visibility and accountability over physical files containing confidential information. Key card system controls limit accessibility to the Fire and Police Commission's area; however, testing of audit procedure concluded that:

- Keys for locked cabinets containing completed citizen complaint files are maintained by an individual who does not have a direct business need for access to the files.
 - Physical folders containing citizen complaints pending investigation are maintained on the investigator's desk and accessible to staff who do not have an authorized business use.
 - The FPC does not have a formal, documented process for requesting or terminating access to systems and applications authorized to staff with a specific business need.
-

Recommendation 10: Develop and implement access controls over physical files, systems, applications and databases.

Although a key card is required for access to the Fire and Police Commission and visitors have to be escorted while in the area; risk mitigating processes and controls of inventory management and safeguarding should be developed, documented and implemented. To strengthen physical controls and segregation of duties over FPC assets, Management should:

- Develop and implement access controls to ensure that access to physical files, systems, applications and databases is restricted to authorized personnel.
- Keep both pending and completed physical, confidential files in locked file cabinets; and access to these file should be accessible only to staff with a legitimate business need.
- Restrict access to records, assets, physical files, systems and applications to authorized personnel with a legitimate business need and to allow for appropriate segregation of duties.

- Develop and implement a process or checklist to grants access for new or existing staff and terminate access upon separation of employment or transfer to another City department.
-

Cell Phone and Mobile Device Management and Utilization

In accordance with best practice, a mobile device is defined as any electronic device with the ability to transmit or receive data, text, and/or voice, via a cellular network. This includes but is not limited to smartphones, cellular equipped tablets, laptops, and mobile hot-spots. Using a mobile device in business can boost productivity, mobility, safety and morale of employees.

These devices can help employees to:

- Improve customer service
- Remain in contact with the office, customers and suppliers
- Increase mobility
- Increase productivity
- Work remotely

Mobile devices are a vital piece of business equipment for many businesses and their staff. They are commonly used in almost every City of Milwaukee department to increase performance in the field and extend communication beyond the office. The City is committed to providing and promoting this technology as appropriate to add value to the community by delivering high quality services at the lowest possible cost. Connecting a mobile phone or a laptop to the internet can give employees an even greater degree of flexibility.

However, significant business challenges can emerge from using mobile devices at work. For example:

- **Workflow disruption** - always-on communication in the form of personal and work-related calls can disturb employee workflow and decrease their productivity.

- **Compromised work-life balance** - 'all hours' availability can interrupt your employees' personal life if they receive calls outside their working hours.
- **Costs** - providing mobile phones to your workforce can be expensive. However, you can enable features on your handsets and SIM cards to restrict the use of phones to business purpose only. You can also choose a tariff that suits company usage. Speak to your service provider about what is possible.
- **Legal issues** - the law prohibits using handheld phones while driving. If you require or permit your staff to use a handheld mobile device while driving on duty, you could be committing an offence.
- **Territories** - if you expect mobile users to travel overseas, you should check costs. Keep in mind that you may need 'tri-band' handsets if travelling to North America.

When employees use company owned mobile devices for reasons unrelated to work, the devices can become an unwelcome distraction at the very least and a legal and operational risk at worst. To avoid potential problems, companies should have a clear policy on the use of company issued mobile devices.

Testing of audit procedures concluded that policies, procedures, internal controls and processes governing the use and monitoring of City-issued mobile devices should be developed and implemented to include specific steps, actions and processes to mitigate the City's risk to legal liability and in order to comply with applicable City-wide policies and procedures, rules and regulation.

Specifically,

- There is no internal formal, documented policy and procedure governing the use, monitoring and return of City-issued mobile devices.
- City-owned mobile devices are issued to staff in a manner inconsistent with the roles, responsibilities and requirements of their job functions, or not distributed to all staff members performing the same or similar job.

- City-owned mobile devices previously issued to former FPC staff have not been returned to the ITMD, have not been deactivated, and the FPC is still being billed for services even though the phones are not currently being used.
-

Recommendation 11: Develop and implement a policy and procedure regarding City-issued cell phone and mobile device management and utilization.

Management should develop and implement a documented, formal, well-defined policy and procedure for cellphone and mobile device management and utilization processes and controls.

The documented policy and procedure should include:

- Oversight and usage monitoring (accountability and responsibility).
- Device issuance, activations, returns and deactivation.
- Approval authority.
- Usage monitoring (excessive, personal, reimbursement requirements, and exceptions).
- Storage and safeguarding.
- Monthly oversight and usage monitoring.
- Standard business needs evaluation form.
- Device issuance, return and deactivation of mobile device form.
- Any non-City e-mail, instant messaging, social media, or other accounts must not be used to conduct City-related business, or downloaded on the mobile device.

In addition, policies and procedures should be stored in a centralized location that is easily accessible and should be updated as changes occur to the process.

Recommendation 12: Develop and implement a standard “Business Needs Evaluation Approval” and “Deactivation” form.

In addition to the Information Technology Management Division's Request IT Support (RITS) ticket, Management should develop and implement a standard form to evaluate the business need, approval and deactivation for a City-issued mobile device. Management should:

- Develop and implement a standard form that will document the business need and restrictions used to solidify approval for the issuance of a cell phone or mobile device to staff. The form should be signed by the employee and the supervisor that authorized approval. In addition, the form should be maintained in the employee departmental employee personnel file.
- Develop and implement a standard form that will document the return of a City-owned mobile device. The form should be signed by the employee and the supervisor retrieving the return of the mobile device.
- Develop and implement a documented process for returning the mobile to the ITMD.
- Return the City-issued mobile devices, not currently being used for City business, to the ITMD and request that services be deactivated, as per the City-wide Mobile Device Management Policy.
- Contact the mobile service carrier to determine whether the City can be reimbursed for the months in which the City was billed for services after the employee separated employment with the FPC.
- Assign a point of contact person responsible for requesting, granting, administering or terminating access to city-owned mobile devices and databases.

Professional Service Contract

The City of Milwaukee, Department of Administration, Purchasing Division's mission is to acquire commodities and services for City Departments in the most cost effective, efficient, and impartial manner within the appropriate guidelines. Effective October 15, 2015, all professional contracts, including but not limited to those with former City employees, regardless of the dollar amount, must be executed through the Purchasing Division.

As defined in s, 310-13-2-an of the Milwaukee Code of Ordinances, a professional service contract is any contract in which the majority of workers engaged in the performance of the contract perform work which:

- a-1: Is predominantly intellectual and varied in nature, as opposed to work which involves routine mental, manual, mechanical or physical labor.
- a-2: Requires advanced knowledge in a field of science or learning customarily acquired by a prolonged course of specialized intellectual instruction and study in an institution of higher education or a hospital.

Prior to contracting professional services for any dollar amount, whether or not it is with a former City employee, departments are required to submit and prior to allowing the contractor to begin work, the following to the Purchasing Division:

- A PeopleSoft Requisition.
- A Request for Exception to Bid Form.
- A Request for Pricing Form (must include the contractor's signature).
- A Summary of Experience Form.
- A Professional Service Contract Questionnaire.
- A Slavery Disclosure Affidavit.
- A W-9 Form (if the vendor does not have a Vendor ID in the FMIS).

Testing of audit procedures suggested that the FPC does not have a documented, process in place to ensure that internal processes are in compliance with City-wide policies and applicable rules and regulations to mitigate the City's risk to legal liability.

Specifically,

- The Executive Director executed a professional service contract, beginning October 1, 2019, with a Public Relations Consultant; however, the Purchasing Division had no prior knowledge regarding the execution of the contract and was not involved in the execution of the contract.

- Professional service contracts to secure the services of an external rater to perform testing for promotional exams are established without the involvement of the Purchasing Department. **Note:** This finding was included at the request of the Executive Director’s during the audit’s Exit Conference.
-

Recommendation 13: Develop and implement documented, comprehensive internal controls and processes to comply with city-wide purchasing policies, procedures, and applicable rules and regulations.

To ensure consistency and compliance with city-wide City of Milwaukee purchasing policies, applicable rules and regulations, Management should:

- Develop and implement documented, comprehensive internal controls and processes to uphold prerequisites as stipulated in the City-wide Purchasing Liaison Manual and applicable rules and regulations to safeguard the City from legal liability; assure compliance with the Internal Revenue Service guidelines (applicable to payroll taxes); and eliminates the possibility of penalty by IRS for non-compliance with payroll tax guidelines.
 - Develop, implement and document, well-defined policies and procedures to assure that all contracts established by the FPC comply with the requires as published in the City-wide Purchasing Liaison Manual.
-

The Fire and Police Commission’s Lack of Authority and Oversight

Historically, the Board of Fire and Police Commissioners was formerly created to remove the fire and police services from the influences of politics. However, in 1988, when the s. 62.51, Wis. Stats., transferred appointment of the executive director of the Fire and Police Commission from the Board of Commissioners to the mayor, a petition was circulated requesting clarification that the executive director would continue to serve “under the direction of the FPC Board of Commission” as prescribed in the Milwaukee Code of Ordinances (MCO), Chapter 314 and

authorized by the language in the Wis. Stat. 62.50. As a result, there have been reports that an informal agreement between the Mayor, the Common Council, and Fire and Police Commissions was reached establishing that although the executive director would now be appointed by the mayor, he or she would continue to independently serve under the oversight and direction of the Board of FPC Commissioners for transparency and the best interest of the citizens of the City of Milwaukee.

Testing of audit procedures concluded that a structural issues regarding the Commissioner's lack of authority, oversight and direction over the FPC Executive Director and staff should be addressed to protect the City's image, reputation and to establish public trust.

Specifically,

- The Board of Fire and Police Commissioners lacks authority, direction and oversight over the executive director and staff.
- The FPC is not established as a department under the Milwaukee Code of Ordinances.
- The Fire and Police Commissioners the Fire and Police Commission appear to function as two individual departments instead of one.

Observation 1: The Council and the Mayor should collaborate to address structural issues regarding the Fire and Police Commissioner's lack of authority and oversight over the executive director and staff.

To eliminate the lack of authority, protect the City's image, reputation and to reestablish public trust of citizens as well as to remediate the structural issues related to the Fire and Police Commission's absence of authority, direction and oversight the Common Council should collaborate with the Mayor and together work to:

Specifically

- Develop, implement and document a well-defined comprehensive agreement to ensure the FPC operates with unquestionable transparency, honesty and integrity and with regard for the best interest for citizens of the City of Milwaukee residents by:
 - Providing clear lines of authority over the activities of the executive director and staff to the Board of Fire and Police Commissioners as prescribed by s.314-5 of the Milwaukee Code of Ordinances which states “there is a created position of an executive director to comprise the role of executive secretary of the board. Under the direction of the board, the executive director shall act as the principal staff of the board in exercising the board’s functions and powers...”
 - Collaborate to propose a change in the relevant portion of s. 62.50, Wis. Stats. making it clear that the Fire and Police Commission is the “administrator” over the executive director, staff, and department as a whole, and provides direction to and holds jurisdiction over the department.
-

Appendix 1

JOB EVALUATION REPORT

City Service Commission Meeting: July 17, 2018

Fire & Police Commission

Current	Recommendation
New Position	Fire and Police Commission Risk Manager PR 2MX (\$75,478 - \$105,669) One Position FN: Recruitment Flexibility anywhere in the Range with Approval by DER and Chair of Finance and Personnel
New Position	Fire and Police Commission Risk Auditor PR 2FX (\$48,670 - \$67,616) One Position
Fire and Police Commission Investigator/Auditor PR 2HX (\$54,865 - \$76,806) One Position	Fire and Police Commission Investigator/Auditor PR 2HX (\$54,865 - \$76,806) One Position Designated as Bilingual

Background

The Fire and Police Commission requested a classification study of two new positions included in the 2018 budget. In addition, one new position of Fire and Police Commission Investigator/Auditor was created in the budget and requested to be bilingual. Job descriptions were provided and discussions were held with La Keisha Butler, Fire and Police Commission Executive Director.

Current	New Position		
Recommended	Fire and Police Commission Risk Manager	PR 2MX (\$75,478 - \$105,669)	1 Position

This new position in the Fire and Police Commission (FPC) will develop an external risk management plan for the Fire and Police Departments, and incorporate that plan into a greater city-wide risk management plan; detect, analyze and deter risk by identifying unusual trends and risk indicators in the departments' processes and operations; create policies, procedures and control assessments in response to identified risks; evaluate the effectiveness of risk control measures; and provide training regarding risk management strategies and programs. Duties and responsibilities include the following.

- 20% **Develop External Risk Management Plan** - develop, implement and coordinate a risk management plan for the Fire and Police Departments that will be incorporated into a city-wide risk management program; develop and implement systems to provide better reporting and management of information; and review and study industry best practices regarding risk management.

- 20% **Detect, Analyze and Deter Risk** - work with the City Attorney's Office to analyze and review claims and suits filed with the Equal Employment Opportunity Commission, the Equal Rights Division, and state and federal courts against Fire and Police Department employees to evaluate legal issues, assess risk, and prepare plans of action; analyze disciplinary actions (both appealed and not appealed), citizen complaints, personnel investigations conducted by the Fire and Police Departments, and claims filed with the City Attorney's Office for trends; compile, analyze and report on statistical data queried from Fire and Police Department data storage mechanisms; detect and analyze department operational activities and processes to identify unusual trends and risk indicators; make recommendations to deter risk and improve desired goals; continuously review Fire and Police Department rules and standard operating procedures, internal audit practices, legal trends in Wisconsin and other states, and keep informed of other relevant trends that

will allow for proactive, rather than reactive, responses to risk; conduct research and analysis on issues that affect loss prevention and avoidance, risk assessment, and how to minimize the departments' handling of and susceptibility to risk; and work with the Fire and Police Departments to identify opportunities to share data, resources, or educational materials to address risk concerns.

- 20% **Draft and Propose Policies, Procedures and Control Assessments** - develop comprehensive policies, procedures and training programs to address department-specific operational risk concerns; work with a city-wide risk management program to develop a process for centralizing claims against the Police and Fire Departments; audit, monitor, and manage the Police Department Early Intervention Program and identify areas for improvement; develop recommendations for department heads and other managers and directors as needed; and develop long-term goals and strategies regarding risk management.

- 10% **Evaluate the Effectiveness of Risk Control Measures** - work with the Fire and Police Commission Executive Director and the Fire and Police Commission Risk Auditor to continuously review and analyze the progress of long and short-term goals and strategies, policies and procedures.

- 20% **Provide Training regarding Risk Management Strategies and Programs** - develop good working relationships with department officials to ensure successful program outcomes; serve as the primary contact with departments and Common Council committees regarding data analysis and reporting; provide guidance and direction to the Fire and Police Commission Executive Director and Fire and Police Departments, other department heads and City officials regarding areas of risk concern and recommend measures to reduce or eliminate risk; review, identify and coordinate training interventions to ensure compliance with program regulations and to address and respond to concerns; participate in public panel discussions, testify to the FPC Board, assist with general FPC business when needed and travel to conferences and events related to upholding the public's health, safety, welfare, and 21st Century policing.

- 10% **Direction and Oversight** - direct and supervise activities of Fire and Police Commission Risk Auditor.

Minimum requirements include a bachelor's degree in risk management, finance, economics, business management, statistics, computer science or related field and four years of related experience including experience in data research, collection and analysis. Equivalent combinations of education and experience may be considered. These requirements have not been assessed by the Staffing Division.

To study this position, comparisons were made to other positions in the City with risk management responsibilities and/or high-level policy development responsibilities including the following.

Assistant Chief of Police-Risk Mgmt. Bureau	Police	4RX	\$103,841-\$145,381
Employee Benefits Director	Employee Relations	1KX	\$85,757-\$120,064
Emergency Communications and Policy Director	Fire and Police Commission	2NX	\$80,442-\$112,627
Worker's Compensation & Safety Manager	Employee Relations	1IX	\$75,478-\$105,669
Homeland Security Director	Fire and Police Commission	1IX	\$75,478-\$105,669
Assistant City Attorney III	City Attorney's Office	2MX	\$75,478-\$105,669
Risk Management and Safety Officer	Employee Relations	2JX	\$62,338-\$87,270

This position will supervise one position of Fire and Police Commission Risk Auditor and will have a more limited scope compared to the Assistant Chief of Police assigned to the Risk Management Bureau and the Employee Benefits Director. More comparable positions are the Assistant City Attorney III in Pay Range 2MX (\$75,478-\$105,669) and the Worker's Compensation & Safety Manager in Pay Range 1IX (\$75,478 - \$105,669). Both of these

positions work to reduce risk for the City and the Assistant City Attorney III also conducts research and utilizes analytical skills and risk management strategies, principles, and tools at a high level. An Assistant City Attorney III is considered an intermediate level Attorney position with at least five years of experience, a specialized scope of work requiring in-depth knowledge of a subject area, and works independently and receives limited guidance. We further recommend adding a footnote to allow recruitment anywhere in the pay range subject to approval by the Department of Employee Relations (DER) and the Chair of the Committee on Finance and Personnel due to difficulty in recruiting individuals for unique higher level positions including risk management. The requested title of “Fire and Police Commission Risk Manager” is descriptive of the work and reflects the level of the position.

We therefore recommend this new position be classified as “Fire and Police Commission Risk Manager” in Pay Range 2MX (\$75,478-\$105,669) with recruitment flexibility for anywhere in the pay range with approval by DER and the Chair of the Committee on Finance and Personnel.

Current	New Position		
Recommended	Fire and Police Commission Risk Auditor	PR 2FX (\$48,670 - \$67,616)	1 Position

This new position will assist the Fire and Police Commission Risk Manager in detecting, analyzing and deterring risk by identifying unusual trends and risk indicators in the Police and Fire Departments’ processes and operations; conduct extensive and in-depth research and analysis of various public safety risk management issues; draft policies, procedures and control assessments in response to identified risks; assist in evaluating the effectiveness of risk control measures; and assist with risk management strategies and training programs.

- 40% **Assist in Detecting, Analyzing and Deterring Risk** - work with the City Attorney’s Office to analyze and review claims and suits filed with the Equal Employment Opportunity Commission, the Equal Rights Division, and state and federal courts against Fire and Police Department employees to evaluate legal issues, and assess risk; analyze disciplinary actions (both appealed and not appealed), citizen complaints, personnel investigations conducted by the Fire and Police Departments, and claims filed with the City Attorney for trends; compile, analyze and report on statistical data queried from Fire and Police Department data storage mechanisms; detect and analyze department operational activities and processes to identify unusual trends and risk indicators; make recommendations to FPC Risk Manager on how to deter risk and improve desired goals; continuously review Fire and Police Department rules and standard operating procedures, legal trends in Wisconsin and other states, and keep informed of other relevant trends that will allow for proactive, rather than reactive, responses to risk; conduct research and analysis on issues that affect loss prevention and avoidance, risk assessment, and how to minimize the departments’ handling of and susceptibility to risk; and alert the Fire and Police Commission Risk Manager to opportunities to share data, resources, or educational materials to address risk concerns.
- 20% **Assist in Drafting Policies, Procedures and Control Assessments** - work with the Fire and Police Commission Risk Manager and a city-wide risk management program to develop a process for centralizing claims against the Police and Fire Departments; audit, monitor, and manage the Police Department Early Intervention Program and identify areas for improvement; draft recommendations for department heads and other managers and directors as needed; prepare analyses, summaries, and reports on short notice in response to critical events and issues and provide information for periodic reports.
- 20% **Assist in Evaluating the Effectiveness of Risk Control Measures** - continuously review and analyze the progress of long and short-term goals and strategies, policies and procedures.
- 15% **Assist in Providing Training regarding Risk Management Strategies and Programs** - develop good working relationships with department officials to ensure successful program outcomes; serve as the back-up contact with departments and Common Council committees regarding data analysis and reporting;

provide guidance and direction to the Fire and Police Commission Executive Director and the Fire and Police Commission Risk Manager regarding areas of risk concern and recommend measures to reduce or eliminate risk; review, identify and coordinate training interventions to ensure compliance with program regulations; participate in public panel discussions, testify to the FPC Board, and travel to conferences and events related to upholding the public's health, safety, welfare, and 21st Century policing.

5% **Assist with Website** - assist in maintaining and providing data for the FPC website in coordination with the City web master; and assist with general FPC business when needed.

Minimum requirements include a bachelor's degree in risk management, finance, economics, business management, statistics, computer science or related field and two years of related experience including experience in data research, collection and analysis; insurance claims adjusting; or related investigations. Equivalent combinations of education and experience may be considered. These requirements have not been assessed by the Staffing Division.

To study this position, comparisons were made to several positions including the following:

Contract Compliance Officer	DOA-Office of Small Business Dev and DPW-Administrative Services	2GX	\$51,469-\$72,063
Environmental Policy Analyst	DPW-Operations-Forestry	2GX	\$51,469-\$72,063
Claims Adjuster Specialist	Employee Relations	2FX	\$48,670-\$67,616
Research and Policy Analyst	Fire and Police Commission	2FX	\$48,670-\$67,616
Equal Rights Specialist	Common Council/City Clerk's Office	2EX	\$48,670-\$63,426

The most comparable position is the Research and Policy Analyst in Pay Range 2FX (\$48,670-\$67,616) located in the Fire and Police Commission. This position conducts extensive and in-depth research and analysis of various public safety issues and provides guidance and advice to the Fire and Police Commission Executive Director, the Board of Fire and Police Commissioners, and the Fire and Police Chiefs regarding findings and recommendations. The requested title of "Fire and Police Commission Risk Auditor" provides a good description of the work.

We therefore recommend this new position be classified as "Fire and Police Commission Risk Auditor" in Pay Range 2FX (\$48,670-\$67,616).

Current	Fire and Police Commission Investigator/Auditor	PR 2HX (\$54,865 - \$76,806)	1 Position
Recommended	Fire and Police Commission Investigator/Auditor (Bilingual Designation in Positions Ordinance)	PR 2HX (\$54,865 - \$76,806)	1 Position

One new position of Fire and Police Commission Investigator/Auditor was approved in the 2018 budget with the directive that it be bilingual. With this new position there will be a total of three Fire and Police Commission Investigator/Auditor positions. These positions investigate complaints filed against members of the Police and Fire Departments arising from misconduct, including violation of department rules, policies and procedures. They obtain and review documents; interview witnesses; collect, evaluate and analyze information from various sources; prepare investigative reports; and make recommendations to the Fire and Police Commission Executive Director.

To designate one of the three positions of Fire and Police Commission Investigator/Auditor positions to be bilingual we recommend adding the bilingual designation to one of the positions in the Positions Ordinance. To make the titles in the Positions Ordinance consistent with those in the Salary Ordinance we recommend that they be changed from "Investigator/Auditor" to "Fire and Police Commission Investigator/Auditor".

Action Required – Effective Pay Period 1, 2018 (December 31, 2017)

In the Salary Ordinance

Under Pay Range 2FX:

Add the title of “Fire and Police Commission Risk Auditor”.

Under Pay Range 2MX:

Add the title of “Fire and Police Commission Risk Manager (4)”.

Add footnote “(4) Recruitment may be at any rate in the pay range with approval of DER and the Chair of the Committee on Finance and Personnel.”

In the Positions Ordinance

Under Fire and Police Commission:

Delete three positions of “Investigator/Auditor”

Add two positions of “Fire and Police Commission Investigator/Auditor”

Add one position of “Fire and Police Commission Investigator/Auditor – Bilingual”

Delete two positions of “Risk Management Specialist”.

Add one position of “Fire and Police Commission Risk Management Manager”

Add one position of “Fire and Police Commission Risk Management Auditor”

Prepared by: _____
Sarah Trotter, Human Resources Representative

Reviewed by: _____
Andrea Knickerbocker, Human Resources Manager

Reviewed by: _____
Maria Monteagudo, Employee Relations Director



Fire and Police Commission

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April 1, 2020

Ronda M. Kohlheim
Inspector General
Office of the City Clerk

Re: Response to Milwaukee Fire and Police Commission Audit Findings and Recommendations

Dear Inspector General Kohlheim:

In this document, you will find the Milwaukee Fire and Police Commission (FPC) responses to the Audit Recommendations for the FPC Department. FPC would like to take this opportunity to thank the Employee Relations Director for the City of Milwaukee's Department of Employee Relations and the City Attorney's Office for their assistance throughout this entire process. FPC would also like to thank the Inspector General, for the time and feedback provided regarding the departments' operations. The FPC has reviewed the report presented on **March 6, 2020** and would like to offer the following responses to the recommendations, while also making some observations regarding the process of this audit.

The intent of this response letter is to formally acknowledge the recommendations the audit report presented; learn where there are areas for growth and consistency; and relay rationale on why certain processes and procedures are in place. Below is a timeline of events in occurrence:

- **December 3, 2019**, the Inspector General made an open records request (ORR) to the Executive Director asking for all emailed communications between the current Executive Director, the then Operations Manager, the then Staffing Services Manager and the Risk Management Manager.¹
- **December 9, 2019**, the Inspector General made another ORR requesting copies of FPC's internal documented policies and procedures as it relates to the following areas: Recruiting and Testing Standards, Investigating and Monitoring of Citizen Complaints, Disciplining Police and Fire employees for misconduct, Community Relations, Risk Management, Compliance with the ACLU Settlement & Agreement and Emergency Management.²
- **December 12, 2019**, the first meeting with FPC Executive Director, Inspector General, City Clerk, Employee Relations Director, and Assistant City Attorney occurred. The ORRs, audit scope parameters, and the reason behind the audit were discussed. Topics to be covered in the audit, and which topics would not, along with the timeline were also discussed.

¹ Please note the FPC had not yet been notified of a plan by the Common Council to conduct an audit or review of the FPC department. The first time the request for an audit was made at the **December 5, 2019** Steering and Rules Committee meeting in closed session where the Inspector General was present. File # 191309

<https://milwaukee.legistar.com/LegislationDetail.aspx?ID=4267955&GUID=CCE21E54-989B-46A5-8D09-EB4E94DDA504&Options=&Search=>

² Given this request contained confidential personnel requests and the scope of the audit had not yet been formalized, the Executive Director requested a meeting with the Employee Relations Director and Assistant City Attorney specializing in ORRs. This meeting occurred via phone conference on **December 10, 2019**.



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- **December 16, 2019**³, the audit announcement letter was emailed to the Executive Director, Common Council President, Employee Relations Director, City Clerk and Assistant City Attorney by the Inspector General.
- **December 18, 2019**, the Inspector General sent an email to the Executive Director requesting all policies and procedures related to this audit prior to the Audit Entrance Conference meeting scheduled for **December 23, 2019**. The Inspector General noted that this was not an ORR, rather a request related to the audit. Enclosed within this email was the agenda for the Audit Conference meeting.
- **December 19, 2019**, the Employee Relations Director replied to the Inspector General's agenda with comments, questions and concerns.⁴
- **December 20, 2019**, the Inspector General sent an email to the Executive Director stating that *in light of concerns relating to the FPC audit, the scope of the audit was subject to change based on the review of the Inspector General*. Enclosed within this email, additional requests were made for FPC internal operating policies and procedures for the following: Monitoring and Investigating Citizen Complaints, Recruiting, Hiring and Testing Procedures & Processes, Training, Cross-training of FPC employees Procedures & Processes, Policies, Procedures and Processes for placing qualified candidates on the eligibility list and selecting an individual on the eligibility list.
- **December 23, 2019**, the Audit Entrance Conference occurred. In attendance were FPC Executive Director, Inspector General, Employee Relations Director and Assistant City Attorney. The agenda and the previously emailed comments by the Employee Relations Director were used as a guide to drive the conversation. All parties reviewed the audit announcement letter, discussed the timeline and noted the areas the audit scope would not include. Since the audit scope was to be focused on the FPC Testing and Recruiting and the Citizen Complaints investigations, the Executive Director would facilitate meetings with staff directly related to these areas, which included the Human Resources Representative, Human Resource Analyst-Senior, Recruiter, Community Education Assistant, Risk Management Manager⁵ and the Investigator/Auditor handling citizen complaints. After all of the staff members interviews were complete, the last interview would be with the Executive Director.
- **December 30, 2019**, the Inspector General sent emails to the following FPC staff members requesting a walk-through to test departmental Policies, Procedures and gain an understanding of staff day-to-day operations: the Investigator/Auditor, Risk Management Manager, Human Resources Representative, Human Resources Analyst-Senior, Recruiter and Community Education Assistant.⁶

³ Appendix A: Audit Announcement Letter dated **December 16, 2019**.

⁴ Appendix B: Audit Entrance Conference Agenda with comments from the Employee Relations Director.

⁵ The Risk Management Manager managed the investigations unit from **September 26, 2019** until **January 3, 2020**.

⁶ Appendix C: Schedule of meetings (dates) with the Inspector General with referenced staff.



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- **January 15, 2020**, the Inspector General emailed the Executive Director that to ensure the audit provided a clear understanding to all interested parties; the Inspector General would be expanding the audit slightly. To make this determination, the Inspector General asked to meet with **all staff**, a deviation from the original audit scope letter and previous meetings.⁷
- **January 21, 2020**, an invitation was sent to the Inspector General (accepted invite on **January 24, 2020**), by the Executive Director, to attend the all staff meeting on **January 27, 2020** to help ease concerns or questions by all staff. The Inspector General emailed on the day of the staff meeting (**January 27, 2020**) that it was no longer feasible to attend the all staff meeting.
- **February 24, 2020**, the Executive Director was unable to meet with the Inspector General as previously scheduled. The meeting was re-scheduled for **February 28, 2020**. The purpose of this first and final meeting was to gain an understanding of the Executive Director's role and responsibilities, along with the roles and responsibilities of staff, job titles and descriptions.⁸ Additionally, the Inspector General would share what this role meant for the City, the assessment of the FPC department and any changes or decisions of the FPC structure.
- **February 28, 2020**, at the conclusion of this meeting, there was a follow up with an Exit Conference meeting, to discuss audit findings and recommendations. Post meeting, the Executive Director delivered on the request of the Inspector General outlining FPC staff roles and responsibilities, along with current FPC projects.⁹
- **March 5, 2020**, the Investigator/Auditor dedicated to Citizen Complaint Investigations emailed the Inspector General with concerns with the audit process of the Citizen Complaints handled by the FPC.
- **March 9, 2020**, the audit Exit Conference was held. In attendance was Common Council President, the City Clerk, Employee Relations Director and FPC Executive Director. The draft audit report was discussed, questions were asked, and comments and concerns were addressed. Some of the same concerns that are still discussed in this audit report regarding testing and recruitment processes, testing schedules and a lack of understanding of these processes as recommendations were covered in that meeting. To address these concerns, the Inspector General agreed to make edits to the first draft audit report and the audit summary report would be re-submitted. The audit summary was re-submitted on **March 10, 2020**.

⁷ Email from Inspector General wanting the total number of approved FPC positions; for each position title, how many were currently staffed, vacant, or staffed, but the employee was on a leave; and names (first and last), and titles for current staff.

⁸ Note: the Inspector General has completed one-on-one interviews/walk-throughs with ALL staff prior to this meeting to gain an understanding of each FPC staff member roles and responsibilities.

⁹ Appendix D: The Executive Director followed up with an email to the Inspector General on **March 4, 2020** with an FPC summary, which included; FPC staff roles and responsibilities, listing of FPC commissioners and FPC summary of Commission meetings and active committees for 2019 year up to the date of submission.



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- **March 30, 2020**, the Management Response letter was due to the Inspector General. Due to COVID-19 emergency activities and having staff work remotely, the FPC Executive Director requested an extension to submit the response letter on **April 1, 2020**. The Steering and Rules committee scheduled for **April 2, 2020** where this audit would be discussed was cancelled on **March 27, 2020**. The extension to submit the response by **April 1, 2020** was granted.

It is the opinion of the FPC that this timeline is of core importance in order to demonstrate the cooperation, transparency, and diligence the FPC staff exhibited during the entirety of the audit process. Questions remain present, as evidenced in this Management Response letter, that there seemed to be a lack of uniform and consistent communications between the Inspector General, FPC staff and other City personnel. In addition, there was no clear understanding by the FPC of the scope of the audit—leading to structural inconsistencies as well as no documented questions or recordings of the walk-throughs and staff interviews—to ensure fairness and quality assurance by the Inspector General. The FPC Executive Director also has knowledge that FPC documents designated **CONFIDENTIAL** were forwarded to the Inspector General by several FPC employees during the course of this audit, without the authorization and knowledge of the management personnel at the time these documents were sent.¹⁰

The FPC does not in any way discredit the value and work done in this audit report. However, in order to properly respond to this audit report, the FPC wants to address why the recommendations in this audit report raise questions/concerns and in some instances, note the recommendation as completed, given that proper documentation and information was provided to the Inspector General and the recommendation has been resolved.

Sincerely,

Griselda Aldrete
Executive Director

¹⁰ Email communications between FPC staff and the Inspector General were discovered after two staff resignations in late February occurred as it related to **CONFIDENTIAL** testing information and candidate information; along with confidential memorandums and staff and departmental information.



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A. Recruiting, Testing and Hiring Controls

Over the last two years, the FPC has endured leadership changes at the Executive Director level. In addition, staff vacancies have gone unfilled for long periods, prior to the current Executive Director beginning in this role in **September 2019**. At the start of the tenure as Executive Director, an assessment of departmental operations began which included one-on-one meetings with all FPC staff to gain an understanding of all roles, responsibilities and gain departmental history. The Executive Director also began meeting with the FPC Operations Manager¹¹ and FPC Commission Chair to begin to understand commission-meeting operations.

Shortly after starting full-time, the Executive Director realized that many of the processes for current employee operations, job duties and responsibilities, and commission operations were not formally documented. While limited documentation existed in some areas including testing, recruiting and investigations, many employees operated via institutional knowledge, and if they were new to the department, they began documenting their current processes and procedures. The Executive Director began asking the Testing and Recruiting staff to document their work and create procedures and timelines for the various Fire and Police Department exam processes. Cross-training among Testing staff was also necessary, since staff were previously assigned to either Police or Fire testing; not both. Staff absences affected cross-training, which in turn, affected overall FPC operations as it related to Testing and Recruiting.

The recruiting aspect of the FPC is very important for the two departments the FPC serves. Both the Police and Fire Departments rely on the FPC to find quality recruits who can successfully pass all parts of the hiring process, which include a written, oral and physical examination, a background investigation, psychological test, medical examination and drug screening. Currently, the FPC has one full-time recruiter and two additional staff members who are assigned 25% recruiting responsibilities.¹² The Executive Director tasked the Recruiting unit to come up with a recruitment plan for the 2019-2020 testing cycle in the fall of 2019. This plan would serve as a guide for the Recruiting unit as the testing needs increased and would assist the Fire and Police Departments' recruitment units in their recruitment efforts.

¹¹ Please note that the FPC Operations Manager resigned on **September 2, 2019** before the Executive Director joined the department full-time on **September 10, 2019**; the Executive Director began in a part-time capacity upon being sworn into the position on **August 8, 2019**. A Chief of Staff was hired to replace the Operations Manager position and assist with staff and departmental operations in **November 2019**.

¹² The Executive Director hired a Community Outreach Coordinator to help with community outreach and recruiting in **November 2019**—duties previously held by the Operations Manager. The temporary Community Education Assistant who had been with the FPC for almost four years was hired full-time as an under fill to help with testing and recruiting in **March 2020**.



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The new as of **March 9, 2020** Staffing Services Manager submitted a draft report to the Executive Director on **March 24, 2020**. A joint recruitment meeting with the Fire and Police Departments' recruitment units is forthcoming¹³ with a presentation of the joint plan at an upcoming Public Safety and Health Committee.¹⁴

In addition to recruiting, the plan allows the FPC to be in-sync with the City's proactive approach to workforce planning. In essence, the goal is to recruit candidates who see positions in both the Fire and Police Departments as life-long careers. Thus, the Recruiting unit plan has retention strategies for those that the FPC recruits and those who work in either one of the two departments. FPC currently utilizes a texting application, Text Carrier, to communicate with recruits and interested candidates about upcoming recruitment events, testing dates for both the Fire and Police Departments and any updates the FPC wants to provide to keep candidates informed and engaged. In addition to the texting application, FPC also uses JobAps for email communication with potential candidates. FPC has found communicating via text and email are effective ways to retain candidates interested in working in public safety and emergency services.

In addition to looking at the Testing and Recruiting processes, the Executive Director also began assessing staff vacancies to understand where the staffing priorities would be.¹⁵ Staffing up the Testing and Recruiting unit seemed to be a priority given the heavy testing schedule in the fall of 2019. Also of equal priority, was the hiring of an Investigator/Auditor to specifically monitor the American Civil Liberties Union (ACLU) settlement agreement. This hiring decision was validated by the fact that the first one-year progress report of the settlement agreement from the Crime and Justice Institute (CJI) had been released the week of the Executive Director's full-time arrival to the FPC office. The report made reference to the fact that a lack of leadership and direction had hindered the FPC from making meaningful progress towards compliance in its' first year. Also of equal importance, was the appointment of the Director of Emergency Management/Homeland Security & Communications to help with the joint citywide emergency plans and assist in the merging of the City of Milwaukee's Computer-aided Dispatch (CAD) systems between the Police and Fire departments, which the FPC is tasked with overhauling.

¹³ Recruitment plans, meetings and activities were suspended by both departments due to the COVID-19 pandemic.

¹⁴ At the **January 9, 2020** Public Safety & Health Committee, a resolution passed (File No. 191455) requesting the FPC to ensure that recruiting activities for the Fire Department cadet program take place solely within the city of Milwaukee to increase the hiring of Milwaukee residents. The committee asked FPC for a full recruitment plan to be presented to this committee within two months. The file has yet to be scheduled back at the Public Safety & Health Committee:

<https://milwaukee.e-gistar.com/LegislationDetail.aspx?ID=4288545&GUID=FA822CF5-543E-42CA-8EE9-984C793D66DE>

¹⁵ The Executive Director hired a Human Resources Representative in **October 2019** to aid in the testing unit; an Investigator/Auditor in **November 2019** specifically to focus on the compliance efforts for the ACLU Settlement Agreement with a re-classification of the job description and the title of Legal Compliance Coordinator is undergoing evaluation by the Civil Service Commission (CSC) as of the date of submission of this report. The Director of Emergency Management/Homeland Security & Communications is a cabinet level position nominated by the Mayor; a candidate was successfully nominated and confirmed in **November 5, 2019**.



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Operationally, staff meetings were something that had been lacking in the department for months and many employees expressed a desire to have a time each week to see one another given that the FPC offices are not cohesive; the FPC offices are divided into three separate offices, on two floors of City Hall. The Executive Director instituted mandatory weekly staff meetings and presented work rules to the department outlining employee expectations beginning on **September 26, 2019**.

Recommendation #1 – Collaborate with vendors to ensure scoring methodology and testing examination components comply with hiring prerequisites for Fire and Police positions.

It is unclear what this recommendation is trying to address.

The audit report infers that the vendor scoring methodology for testing and examination may not comply with City rules. Which City rules is the Inspector General referring to? If there are in fact City rules or regulations that FPC should be adhering to scoring testing and examinations, FPC would welcome the information because the FPC is unable to locate a City standard referred to in the audit report.

FPC does not know which scoring criteria the audit report is referencing. What are the City's prerequisites to continue in the process referenced in this audit report? The FPC staff does not do periodic reviews of scoring methodology, that is done by the vendor. Depending on the examination being administered, whether for the Police or Fire department, the vendor is responsible for scoring the examination. There are various scoring solutions that may be presented based on item analysis, reliability and validity factors. And jointly with the vendor, the FPC to determines the best scoring solution for the test being administered. Ultimately, the vendor(s) owns the examination materials and scoring due to proprietary reasons.



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NOTE: the audit process did not include interviews by the Inspector General with the vendors¹⁶ the FPC uses to develop and administer examinations¹⁷ for each department. A more accurate understanding of the steps involved in developing, administering and scoring a test may result in a different recommendation or no recommendation at all. For example, EBJacobs, renamed as PSI, has been a vendor for the City of Milwaukee since 1997. They design the examination processes and administer Police related examinations since the United States Department of Justice (DOJ) performed an assessment of the Milwaukee Police Department (MPD) and the FPC¹⁸ in 2015.

The audit report suggests that the examination processes are not documented. A conversation with the vendors would have helped clarify this. Many of the examination components are in fact proprietary and confidential information. However, information about the exam process, components, weights, and preparation guide is available for every exam administered.

For every example job posting, which the FPC Commission approves every time there is an exam, contains the information that is required by the rules of the FPC.¹⁹ This includes a description of the job, the minimum requirements, other knowledge, skills and abilities (KSA's), the components and weights of each, reading materials and candidate prep guides.

The City of Milwaukee entered into a contract with Industrial/Organizational Solutions (IOS) in 2008 to administer and revamp the Fire Department examinations and renewed in 2017.²⁰ As evidenced by the IOS contract, they use the National Firefighter Selection Inventory (NFSI) when developing and administering the exams. The NFSI is a standard used around the country and the exam was customized based on the results of a Job Analysis conducted by the City. FPC staff and the vendor work closely to ensure all applicable standards and regulations are adhered to in preparing the eligible lists. The contract is up for renewal and review in June 2020.²¹

The EBJacobs, now PSI, uses the Law Enforcement Aptitude Battery (LEAB) for the written test and that other test components are designed and administered based on the results of the Job Analysis and in

¹⁶ FPC uses EBJacobs, now PSI, to conduct Police examinations (since 1997) and Industrial /Organizational Solutions (IOS) for the Fire examinations (since 2008).

¹⁷ At the Exit Conference on **March 9, 2020**, this was discussed. Present were the Inspector General, City Clerk, Common Council President, Director of Employee Relations and the FPC Executive Director. The Inspector General stated "the audit was of the FPC, not the vendor(s) the FPC works with".

¹⁸ "This was in response to a request by then MPD Chief Flynn for the department to participate in the US DOJ Collaborative Reform Initiative in order to provide an avenue to strengthen and build the mutual trust between the MPD and the communities they serve. While due to decisions made in the US DOJ no final assessment report is likely to ever be produced from this process, a draft version of the report was made public":

https://graphics.jsonline.com/jsi_news/documents/doj_draftmpdreport.pdf. Taken from the Milwaukee Collaborative Reform Initiative Community Feedback Portal: <https://city.milwaukee.gov/mkecr>.

¹⁹ FPC Rules: <https://city.milwaukee.gov/ImageLibrary/Groups/cityFPC/Rules/FPCRules.pdf>.

²⁰ Appendix E: IOS Contract. The Department of Employee Relations (DER) entered into this contract when FPC was housed inside DER; FPC separated into its own separate City department in 2012.

²¹ See Appendix E.



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accordance with all applicable regulations, including the uniform Equal Employment Opportunity Commission (EEOC) guidelines on Employee Selection Procedures.²² This contract is up for renewal in 2020, upon completion of the Police promotional examinations for Detective, Lieutenant and Sergeant roles. Both PSI and IOS are considered subject matter expert companies in these fields. EBJacobs, now PSI, contract²³ was renewed in January 2020. IOS Contract is up for review in June, 2020.²⁴ FPC will engage the Legislative Research Bureau (LRB) to help with research on national testing vendors to ensure best practices and qualified vendors are considered for future FPC testing.

There is also a recommendation that makes reference to how documentation for pre-employment medical determinations should be completed. The protocols in place have been used by the City vendor, Concentra, for years. FPC does not believe there are deficiencies that have been identified suggesting that the documentation of the pre-employment medical determinations have to be expanded or modified. The FPC staff should not be put in a position to second guess or question a medical finding as to whether a candidate is medically cleared or not for duty.

FPC believes this overall recommendation requires some explanation and background. The change in the timing of when the testing process performs the medical, psychological and drug exams are performed were changes made under a previous FPC Executive Director. The audit fails to identify when this change was made and more importantly why.²⁵ That is a critical piece of this important finding that should be addressed.

Implementation Timeline: More clarity and information is necessary to understand what this recommendation is trying to accomplish and recommend to the FPC Department. However, both of the vendor contracts will be reviewed in 2020 and a discussion about testing processes and timing, along with scoring metrics can be included. Expected implementation date is December 31, 2020

Recommendation #2 – Develop and document a detailed, well-defined pre-employment process to ensure medical examinations, psychological evaluations and drug tests comply with applicable federal and state rules and regulations.

It is not clear what the audit report is suggesting with this recommendation. An appeal of a medical disqualification for failing to meet a medical standard is not appropriate, as stated in FPC Rule VIII Section 7(c).²⁶ If what the audit report is referring to is a peer-to-peer review of the psychological component, then it should be noted as that.

²² Appendix F: City of Milwaukee's Testing and Selection Process Guide, August 11, 2010.

²³ Appendix G: EB Jacobs, now PSI, Contract Extension.

²⁴ See Appendix E.

²⁵ Current FPC staff found this process dates back to 2017.

²⁶ FPC Rules: <https://city.milwaukee.gov/ImageLibrary/Groups/cityFPC/Rules/FPCRules.pdf>



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The medical and background examinations were administered in an inconsistent order in the FPC testing processes dating as far back as 2017. There were no specific timelines in place, but since this discovery, earlier this year (2020), the FPC has ensured that the correct timeline of testing processes along with testing timelines organized by the Testing and Recruiting unit were created in January, 2020. These testing timelines were provided to the Inspector General on **January 3, 2020**.²⁷

Within this recommendation, there is a suggestion to utilize a healthcare professional for pre-employment screenings. This seems to imply that the FPC is not doing so currently. That is not accurate.²⁸ This recommendation also indicates that the medical examination has to be job related and again seems to imply that the FPC is not doing that currently. That is not accurate.²⁹ The medical inquiries used by the current provider in administering pre-employment medical examination are consistent with American Disabilities Act (ADA) requirements. Findings that imply the FPC is not following the required standards under the ADA are not accurate.³⁰

This aspect of the testing process will be given a higher priority by the Staffing Services Manager.³¹ The Staffing Services Manager has an extensive record working with human resources for the City of Milwaukee since 2010. The Staffing Services Manager leads the overall strategy and direction of the Testing and Recruiting units, identifies and sets goals, and ensures the FPC has continued success in its testing and recruitment efforts for both the Police and Fire Departments.

Implementation Timeline: Appendix I of this report which includes the 2020 testing timelines should satisfy this recommendation. The FPC considers this recommendation closed.

Recommendation #3 - Revise, implement and document well-defined, comprehensive policies and procedures for Recruiting, Testing and hiring processes.

In an effort to make these processes standardized and uniform, the FPC developed timelines in January, 2020 and is actively working to complete the recruitment plan.

Part of this recommendation discusses the background check process. The MPD completes all of the background checks for both the Police and Fire candidates. The background check completion process is very fluid and is defined by testing priorities. Consequently, setting a firm completion timeline and deadline for each individual background check is not feasible.

²⁷ Appendix H: FPC Internal Testing Timelines.

²⁸ Appendix I: Contract with Concentra regarding health and drug screenings.

²⁹ See Appendix I.

³⁰ See Appendix I.

³¹ Previous Staffing Services Manager was terminated from the FPC in November 2019. The new FPC Staffing Services Manager began on **March 9, 2020**.



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Background checks can and do vary from person-to-person based on the discoveries found by the MPD. FPC does however work closely with the MPD to monitor and ensure the background checks are completed by the deadlines indicated by the testing timelines and schedules so that the hiring process moves forward. FPC has tweaked the process to accommodate the testing and hiring needs of the City's public safety and emergency services.

Since the Milwaukee Fire Department (MFD) background checks are not as extensive as those for law enforcement officers, the FPC does communicate to MPD the date by which the applicant backgrounds need to be completed. This keeps the exam process on schedule.

As of January, 2020, FPC has developed testing timelines for Police Officer, Fire Fighter, Fire Cadet and for promotional exams for Police Detective, Lieutenant and Sergeant. The timelines allow the FPC staff to work backwards so that the timing of each step in the hiring process is followed from start to finish. The goal is for the FPC to develop testing timelines two to three years ahead to ensure the FPC meets the staffing needs of both departments and the City of Milwaukee's public safety needs.

Promotional examinations for Police Detective, Lieutenant and Sergeant are being handled by outside vendor EBJacobs, now PSI.³² The Fire promotional examinations were handled by outside vendor IOS in August of 2019. Promotional examinations for both departments require the use of outside assessors, also known as subject matter experts, and not internal assessors, to avoid any impropriety or favoritism and to maintain the integrity of the examination process. This is a common practice in public safety testing across the country.

On page 14 of this audit report, a recommendation is made as to the need to use external raters for promotional examinations. The FPC is unclear why this is a finding. This recommendation implies that external raters (assessors) are not used when conducting promotional examinations, when they in fact are.³³

Implementation Timeline: More clarity and information is necessary to understand what this recommendation is trying to accomplish. However, the FPC Testing and Recruiting units will create comprehensive policies for all testing examinations by September 30, 2020.

³² Due to COVID-19 and the global health pandemic, the FPC made the decision to postpone the promotional examination for Detective on **March 27, 2020** for exams that were to begin March 30, 2020. PSI and external assessors would not be able to fly into Milwaukee to administer the exams due to the travel ban. FPC continues to monitor the developments due to COVID-19 and will re-schedule exams as readily possible.

³³ Appendix J: EBJacobs, now PSI, reviewed and approved internal Testing Timelines.



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Recommendation #4- Streamline recruiting, testing and hiring activities to ensure a strong, effective and efficient process.

The FPC Executive Director meets weekly with all the FPC units, including the Testing and Recruiting units. In addition, the Executive Director meets bi-weekly with both the Fire and Police Departments to discuss their staffing and recruitment needs on an on-going basis. The Recruiting unit meets regularly with both Fire and Police Department Recruiters to ensure strategies are coordinated and cohesive to the needs of the departments. While these processes can be fluid, the FPC remains dedicated to delivering the essential testing needed for public safety and emergency service providers, on time and/or before required.

The FPC Recruiting unit is working with the MPD and MFD recruitment staff to come up with a formalized and consistent recruitment plan. FPC regularly attends high schools, colleges and career fairs within the City of Milwaukee. FPC also provides candidates numerous ways to communicate with the department (email, phone, text, and fax). The FPC Recruiting unit regularly sends out emails and text messages to maintain engagement with all potential candidates.³⁴ FPC works with the Fire Department Recruiting team to attend candidate preparation sessions for various positions within the Fire Department and regularly attend events together in order to deliver a unified message and engage potential employees. FPC also works with the Police Department's new Recruiter by regularly attending events. Attending community events as a team, with both departments, allows the FPC to touch more candidates and have the various agencies on site to answer any questions for potential new candidates who are looking to make these professions a career.

Implementation Timeline: Efficiencies will be gained as part of the comprehensive procedures that will be completed in Recommendation #3 by September 30, 2020. Once the Testing and Recruiting procedures are completed this should satisfy this recommendation.

B. Citizen Complaint Investigations Controls

FPC staff is currently working to formalize Investigation procedures as the department prepares to bring on new Investigator/Auditors.³⁵ Currently, with one active Investigator/Auditor on staff solely focused on citizen complaint investigations, the process and procedures for complaint investigations are well-understood and those investigations are executed in a timely, thorough, and professional manner.

³⁴ FPC currently utilizes a texting application, Text Carrier, used to communicate with potential recruits and interested candidates about upcoming recruitment events, testing dates for both the Fire and Police Departments and any updates the FPC wants to provide to keep candidates informed. In addition to the texting application, FPC also uses JobAps for email communication with candidates. Both methods of communication seems to be effective in retaining candidates interested in working in public safety and emergency services.

³⁵ The FPC currently has two Investigator/Auditor vacancies.



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Looking forward, the FPC will build off the current Investigator/Auditor's expertise, experience, and realized best practices to develop internal policies that can be taught to and replicated by new investigative hires. Additionally, as part of the FPC's continued effort to bring transparency to the department, existing successful processes and complaint tracking procedures are being standardized and centralized to the benefit of complaint process consistency and integrity. Beyond bringing much needed formalization to the investigations process, these steps also make complaint compliance efforts more accessible to CJI as they monitor the FPC's progress towards meeting the obligations of the ACLU Settlement Agreement.

When the FPC Investigator/Auditor receives a complaint, the complaint is acknowledged either via phone or email by the Investigator/Auditor and documented in a Master Tracking document. Resolutions are memorialized in a formal disposition letter from the Executive Director after a thorough review of the findings are discussed with the Investigator/Auditor.³⁶ Master Case logs and notes are also kept for each complaint, documenting the steps taken in the investigation, including when and how department members make statements in relation to the complaint investigation.³⁷

Currently, the FPC mostly handles citizen complaints about the MPD.

It should be noted that the audit report and this recommendation makes reference to the fact that citizen complaints against an MFD employee are only investigated by the Fire Department, whether they are received by the MFD directly or the FPC, and are only investigated by the FPC when the complainant is unsatisfied with the outcome. The FPC began meetings with the MFD on November 19, 2019 to discuss having all citizen complaints and personnel investigations received internally or externally by MFD be forwarded and investigated by the FPC. Immediately following this meeting, MFD provided FPC with its investigation algorithm documenting the process they follow when investigating complaints.³⁸

On **December 11, 2019**, a confidential internal memo was created and presented by one of the Investigator/Auditors to the FPC Risk Management Manager outlining the MFD complaint process. MFD and FPC plan to resume this conversation to begin funneling all investigations to the FPC after the COVID-19 pandemic.

³⁶ Prior to September 2019, disposition letters were never sent out to those submitting a complaint to let them know the results of their investigation and the closing of the investigation by the FPC Investigator/Auditor. This is a new practice.

³⁷ Prior to September 2019, a master case log was never kept by FPC Investigator/Auditors that documented detailed notes of each complaint process. This is a new practice.

³⁸ The MFD investigation algorithm was created by the MFD to ensure proper process as outlined in FPC and MFD Rules, the MFD's Code of Conduct, in accordance with the CBA between the City and L215, and per advice from the City Attorney's office. This CONFIDENTIAL document was shared with the FPC by the MFD.



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Recommendation #5 – Develop, implement and document comprehensive, well-defined policies and procedures governing citizen complaint investigations.

The Inspector General's review raised a lengthy list of concerns in relation to Recommendation #5. In an attempt to foster greater understanding of existing procedures and plans to address these recommendations, the following section is bulleted in the same order as the report so each concern could be addressed directly.

- Complaint processes and policies are memorialized in FPC Rule XV and FPC Citizen Complaint Intake Investigation Guidelines (Intake Guidelines) referenced therein.³⁹ On **February 6, 2020**, the FPC Board created a Rules Subcommittee to address changes and/or amendments to the FPC rules.⁴⁰ Since all changes need to come from and be approved, by the FPC Board, the Rules Subcommittee is a newly designed forum to address these specific concerns. The intention is to recommend to the Subcommittee, because of an ongoing FPC Rules audit by the Investigator/Auditor and the FPC Risk Auditor, a review of the Intake Guidelines.⁴¹ In addition, the FPC will recommend changes required to formalize ongoing best practices and align the rules and guidelines more closely with the mandates of the ACLU Settlement Agreement. While the FPC staff welcomes the opportunity to participate in this process, the FPC department cannot unilaterally change FPC Rules or guidelines without the consent and/or knowledge of the FPC Board. Hence, the creation of the Rules Subcommittee was a crucial step to foster the oversight and operations of the FPC Department.
- The formal and informal designation of complaints is a persistent source of confusion in this audit report. The distinction, additionally, is less informative or meaningful than it first appears. The FPC Investigations unit investigates all plausible complaints thoroughly and professionally. The distinction between formal and informal is largely based on the speed that a complaint can be resolved and the number of people that need to be involved to complete the investigation.⁴² For instance, if a complainant is having a hard time obtaining an accident report, the Investigator/Auditor could call the related Police district and request the report. In the event that the complainant then receives the report, this complaint could be closed and it would be

³⁹ FPC Rules: <https://city.milwaukee.gov/ImageLibrary/Groups/cityFPC/Rules/FPCRules.pdf>

⁴⁰ At the **February 6, 2020** regular FPC meeting, a resolution passed (File No. FPC20044) to create the FPC Ethical Rules and Code of Conduct for Commissioners to be sent to the newly created FPC Rules Subcommittee which operates under the Research Committee for review, discussion and community input:
<https://milwaukee.legistar.com/MeetingDetail.aspx?ID=747318&GUID=9B0D5C42-0E2E-4392-ABE1-D462CB179DFC&Options=info&Search=>

⁴¹ The FPC has met with the City Attorney's office to review the Intake Guidelines. An email dated **January 8, 2020** to the Executive Director from the Risk Management Manager, summarizes the meeting the FPC Risk Management Manager along with the two Investigator/Auditors had with the City Attorney's office regarding this issue. A follow-up meeting will be scheduled when the COVID-19 stay at home order is lifted for the State of Wisconsin.

⁴² A detailed email was sent from the FPC Investigator/Auditor to the Inspector General dated **January 16, 2020** outlining the difference between a formal versus informal complaints.



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considered informal. Even so, the Investigator/Auditor thoroughly addressed the issue and the complainant gained the outcome they were seeking. Applying the informal label to the investigation seems to create a false narrative that that investigation was somehow “less than” or the outcome was more baseline than would have occurred if a formal label was applied. This simply is not true. As training materials are compiled for the Investigator/Auditor positions, a clear, objective list of criteria for complaint designations will be included, if possible. Alternatively, because the Intake Guidelines (from which this distinction is drawn) are under the purview of the FPC Board, recommending an elimination of this largely arbitrary distinction is also an option.

- As the internal process of formalization goes on, the Investigator/Auditor’s training binder is being examined and standardized to bring uniformity to future trainings. This binder exists because, at the time of the current Investigator/Auditor’s hiring in March 2019, no formal onboarding or training was received from the FPC department’s most seasoned Investigator/Auditor. The Investigator/Auditor’s self-training process, informed by the FPC Rules, observation, and realized best practices, is contained in a lengthy reference binder that is supplemented or updated as new tactics or methods of investigation produce results. The goal is to standardize this binder so that new Investigator/Auditors hires will have the support of written training as well as person-to-person training.⁴³
- There are currently two Investigator/Auditors working at the FPC; one dedicated to citizen complaints and the other to the monitoring of the ACLU Settlement Agreement and FPC Rules. Thus, the process of assigning complaints to a specific Investigator/Auditor is obvious. Moving forward, as the FPC hires more Investigator/Auditors this assignment of complaints process will be based on existing caseload and experience. There is no responsible way for a “one size fits all” approach at present, but this recommendation will be taken into account as additional Investigator/Auditors are hired, get up to speed with departmental processes, and begin individualized work.⁴⁴

⁴³ A detailed hard-copy binder with the Master Case log, forms, Citizen Complaint Checklist, samples of redacted complaints both formal and informal, was prepared and submitted to the Inspector General by the Investigator/Auditor on **January 21, 2020**.

⁴⁴ Ibid.



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- The Citizen Complaint Checklist asks objective, fact based questions related to complaint tracking, the report, CAD, and complaint numbers, dates of opening, completion, and management review, names of members subject to the complaint and any witnesses, and the disposition. The checklist is maintained in the Investigator/Auditor's individual network folder created for each investigation. They are accessible to the Executive Director and FPC Investigations unit at any time. The purpose of the checklist is to track the progress of complaint investigations, as indicated by the character of the questions it contains. Again, one Investigator/Auditor is filling these out at the moment and is well aware of the use of checklists because they are simple and helpful to the investigations process. The proper use of these checklists and an example is included in the previously referenced training binder for new Investigator/Auditors.
- While the Intake Investigations Process is documented by the Intake Guidelines, these guidelines require an update and a review to ensure best practices are followed. This is the responsible way to ensure the public continues to be served professionally and promptly by the FPC's Investigations unit. Alteration of these guidelines, and related clauses of FPC Rule XV, is under the purview of the FPC Board and the newly constituted FPC Rules Subcommittee. The Executive Director has tasked key FPC staff with preparing recommendations specifically in this area.⁴⁵ These recommendations will, hopefully, be well received and acted upon by the FPC Rules Subcommittee.
- The Citizen Complaint Checklist, referenced previously, includes entry areas for the date the file was delivered to the Executive Director, the date it was reviewed by the Executive Director, and the date the disposition letter was mailed.
- The Intake Guidelines, specifically page 9 and 10, explain the situations when, and the process by which, the FPC Investigator/Auditor reviews complaint investigations completed by MPD or MFD.⁴⁶ These occur when the complainant is unsatisfied with the initial result and requests FPC review. Reviewing all MPD citizen complaint investigations is part of the ACLU Settlement Agreement. Plans have been crafted to carry out this review, and access to the source material, mainly Internal Affairs Division (IAD) complaint files, has been arranged with MPD and the specific personnel at the IAD facility.

⁴⁵ Staff tasked with providing on-going recommendations for the FPC Board to review within the FPC Rules Subcommittee are those who deal the closest with FPC Rules. Staff include but are not limited to: Staffing Services Manager, Human Resources Representative, Investigator/Auditors, Risk Management Manager, Risk Auditor, Paralegal and the Chief of Staff.

⁴⁶ FPC Rules: <https://city.milwaukee.gov/ImageLibrary/Groups/cityFPC/Rules/FPCRules.pdf>



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- Prior to the resignation of the Research and Policy Analyst,⁴⁷ the Executive Director tasked the Research and Policy Analyst with compiling and reviewing complaint data, which was then grouped and examined on the basis of geography, race, gender, and other factors that described both the complainant and the member subject to the complaint. This process involved running reports from the Administrative Investigations Management (AIM) system and analyzing FPC complaint files to provide additional clarity when needed. This task will be maintained within the FPC when a replacement is hired for that position. In the meantime, the same source material is documented and tracked. Providing additional guidance, the previous Research and Policy Analyst created skeleton structures or templates for many of the reports the FPC is responsible for producing, including the annual FPC Citizen Complaint Report.
- FPC's Investigator/Auditor is in constant contact with complainants, by phone or email, throughout the complaint process. This is a matter of providing quality service to the community and is especially important when investigations take an extended period of time to complete; which can occur from time to time for a variety of reasons. While formalizing this is also part of the ongoing effort to train incoming Investigator/Auditors, the hope is to impart to new hires what the current Investigator/Auditor has realized through practice – that regular contact with complainants is not only expected, but makes the overall process better for complainants and more complete from an Investigator/Auditory standpoint.
- As staffing needs are met, more layers of complaint investigation review are a priority. This recommendation is very much in line with the direction that the department is hoping to move as more Investigator/Auditors are hired to the FPC and there are, literally, more “eyes” available.
- While disposition letters are sent to complainants after the completion of the investigation and an explanatory conference is held with the Investigator/Auditor, more could be done to document the process. Again, the Investigator/Auditor is currently in constant contact with complainants during the course of the investigation, but this recommendation will help to inform the training manual currently being created.
- While the Investigator/Auditor prioritizes transparency and complainant knowledge of the process during investigations, the disposition letter for investigations only directs concerns or questions to the FPC office and the Investigator/Auditor. The 30-day explanation for reconsideration will be included moving forward.

Many of the citizen complaints submitted to the FPC are received in-person, by phone, or by email. As a result, the Investigator/Auditor is able to acknowledge receipt contemporaneous to it. Moving forward, a standardized communication could be created to memorialize this event and could be stored in the network folders created for each individual complainant.

⁴⁷ The Research and Policy Analyst resigned on **February 24, 2020**.



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- The previous Research and Policy Analyst created steps for AIM access, entry, and usage in August 2019. This document will be included in the Investigator/Auditor Training Manual.⁴⁸
- Filing guidelines are dictated by the FPC Rules and related Intake Guidelines, which are altered or expanded by FPC Board action. The intention is to recommend greater detail throughout the FPC Rules and point to specific areas in need of improvement based on day-to-day operations. This recommendation is well taken and will be an area of recommendation focus.
- FPC forms are subject to FPC Board approval. Forms labeled FPC 21 and FPC 58 will be included in the FPC Rules Subcommittee recommendations.
- The Citizen Complaint Checklist, coupled with Investigator/Auditor notes, summaries, and disposition letters, provide a detailed documentation of complaint progression.
- Minor Misconduct is defined on page 2 of the Intake Guidelines.⁴⁹ Severity of misconduct allegations is determined on a case-by-case basis and in acknowledgment of the totality of the circumstances in which the alleged conduct occurred. Greater guidance can be reduced to writing in the upcoming training manual for Investigator/Auditors, but it should be acknowledged that there is no easy, universal definition. To provide the level of thorough investigation that the community deserves, this inquiry cannot and should not be hemmed in or reduced to rigid, formulaic determination. The entire process would suffer from placing restrictions on how the severity of an incident is determined.
- Form letters and templates exist for complaints rejected on an objective basis, such as those involving allegations against other agencies (i.e. not MPD or MFD) or filed too remotely in time. The current disposition letter explains the reason(s) why a conclusion was reached about a specific complaint, even when the decision is not to pursue the complaint based on a substantive evaluation of the accusations. These letters are written by the Investigator/Auditor and reviewed with the Executive Director, along with a review of the investigatory file. While the disposition letter comes from a template that is then filled in with case-specific details, a true form letter or template falls well below the standard expected of FPC investigations disposed of on their merits. Each complainant experience is different and each circumstance is unique. Simply mailing out generic form letters, absent specificity about the individual circumstances of closed complaints, would be wholly disrespectful of the complainant's concerns.

⁴⁸ In an email dated **January 9, 2020**, the Executive Director emailed the Chief of Police and command staff a summary of MPD database access needs for the FPC. The permissions were outdated. The Executive Director asked that permissions be removed for employees no longer with the FPC to protect sensitive and confidential information contained in these databases.

⁴⁹ FPC Rules: <https://city.milwaukee.gov/ImageLibrary/Groups/cityFPC/Rules/FPCRules.pdf>.



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- Formal documentation of this process is forthcoming in the Investigator/Auditor Training Manual. FPC staff must start from the beginning on such a document because previous Investigations unit members did not document their processes fully. The FPC is evaluating needed suggestions to the FPC Rules Subcommittee related to complaint procedures and discussing realized best practices of the current Investigator/Auditor. Additionally, while existing guidance may be outdated, it is worth noting that it does exist and is being built upon to ensure better service provision.

Implementation Timeline: An Investigator/Auditor Training Manual has been started and should be completed by November 30, 2020. The goal is to have a comprehensive training manual that is enforced by the FPC investigations procedures. The FPC will also review and if necessary revise the currently established Investigator/Auditor procedures by December 31, 2020

Recommendation #6 – Identify and establish an MOU, LOU or other agreement with community organizations to disseminate information, and/or provide guidance regarding filing a citizen complaint.

To date, community hours and other community events have been held at City owned and operated locations or locations that have a pre-existing and ongoing relationship with the City of Milwaukee. Because FPC and these organizations exist under the same umbrella, a Memorandum of Understanding (MOU) has not been required to gain eager cooperation or participation in FPC events. However, in the event that we expand FPC's community reach to locations or organizations outside of the City umbrella, the FPC has MOU templates ready to be evaluated by the City Attorney's office and disseminated to the concerned parties.

As the FPC has embraced its community engagement responsibilities, the department has significantly increased outreach to existing and potential community partners based on the type of organization they are, their typical audience, and the reasons why the FPC should engage them.⁵⁰

⁵⁰ Appendix K: FPC Community Partners List.



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Please note, MOU's and Letter of Understanding (LOU) are not universally legally binding documents. That contractual status is determined in the absence of other documentation and in the event that a legally binding relationship was the intent of the parties. MOU's, in most cases, are specifically intended to memorialize an agreement and understanding about the interaction and roles of the two signing parties without creating a legally enforceable obligation. In the event that they were legally binding documents, as the Inspector General's opening paragraph to this section suggests the City Attorney would be the appropriate party to honor this contract drafting recommendation as the City of Milwaukee's legal representation.

- Please see above status of MOU's status and approach.
- This recommendation suggests that Milwaukee Public Library(ies) (MPL) and district stations should be trained or instructed on the complaints process and should be prepared to essentially accept complaints as Investigator/Auditors. This would be a severe dereliction of the duty of FPC and an unacceptable delegation of responsibility. MPL and district stations are:
 1. Supplied with complaint forms and explanatory forms in three languages (English, Spanish, and Hmong).
 2. Provided with an overview of the ACLU Settlement Agreement and the role they play in it.
 3. Supplied with the contact card of the Investigator/Auditors and encouraged to call with any questions, concerns, or requests for more supplies.
 - a. A more detailed description of the ACLU Settlement Agreement and the role the libraries play in reaching compliance was pushed out by the Communications Director of the MPL system as the materials were being delivered to branches.

These same steps are scheduled to occur on a quarterly basis and can occur more often if needed. The role these community partners play is in providing access to the complaint process, not carrying out the intake interview. The Investigator/Auditor is responsible for the intake interview because it forms the basis of the investigation. It would be irresponsible to deputize what would amount to hundreds of people as pseudo-Investigator/Auditors when they are not and cannot be expected to carry out the investigatory processes.

Complainant privacy is a major concern for the FPC given the sensitivity of some complaints and in accordance with the complainant's wishes. The FPC will not encourage non-FPC employees to start logging and tracking sensitive, identifying information about complainants. Community organizations that distribute complaint forms and brochures are supplied with contact information for the Investigator/Auditors and instructed to call with any concerns. A direct Citizen to Investigator/Auditor relationship is far preferable to adding yet another set of hands for complainant concerns to pass through. Creating more layers through which a complainant has to navigate to file and resolve a complaint would discourage community engagement with the complaint process and degrade the quality and completeness



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of investigations by increasing the likelihood that important details, communicated secondhand, would be inaccurate.

FPC has regular and ongoing contact with MPL and district stations to ensure that the complaint materials are available to citizens. Points of contact at each location are logged in a tracking sheet, those points of contact are supplied with information necessary to contact the FPC if questions or concerns arise, and each is scheduled to be revisited, in person, on a quarterly basis.

Implementation Timeline: The FPC will consult with the City Attorney's office on the creation of an MOU or LOU template. To be completed by November 30, 2020.

C. Rules of the Board of FPC/Investigations Intake Guidelines

The ACLU Settlement Agreement is an aspect of FPC operations and responsibilities where progress towards compliance was delayed due to leadership and staffing changes over the last two years. Despite this slow start, the FPC has increased access to complaint procedures, published three quarters of mandated stop data for the first time, worked with MPD to update policies to align with the ACLU Settlement Agreement, worked with CJI to update police promotional testing to include knowledge of Community Oriented Policing, and crafted extensive audit planning documents and other materials to properly track and memorialize audit progress and results. The FPC ACLU Subcommittee was created on **February 6, 2020** and it is housed under FPC Complaints and Discipline Committee.⁵¹

Recommendation #7 – The Commission, Executive Director and investigation staff should work together to revise the rules, guidelines and other applicable material to be consistent with the provisions set forth in the settlement between the City and the American Civil Liberties Union in the case *Collins, et al. v. the City of Milwaukee, et al.*

- As previously referenced, the FPC Board recently created a FPC Rules Subcommittee under the FPC Research Committee to address updating the FPC Rules of the Board. A priority of that process is to bring the rules into greater alignment with the ACLU Settlement Agreement.

⁵¹ At the **January 9, 2020** regular FPC meeting, a communication file (File No. FPC20006) was discussed to create the FPC ACLU Subcommittee at the next FPC meeting, for the duration of the ACLU Settlement Agreement, to address deadlines, public concerns and status updates. <https://milwaukee.legistar.com/MeetingDetail.aspx?ID=747318&GUID=9B0D5C42-0E2E-4392-ABE1-D462CB179DFC&Options=info&Search=>



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- For example, the FPC Board Rules **do not** reference the need to have complaints notarized while the Intake Guidelines do make this statement. This type of discrepancy creates confusion and can lead to complainant misunderstanding. In an effort to continue providing quality service to the community, this update is one of the initial recommendations for clarification by the committee.
- The FPC Investigator/Auditor does track the number of complaints filed against individual members and is aware of the need to monitor threshold levels for reporting to the Chief of Police. The Investigator/Auditor, being the sole Investigator/Auditor working on complaints now, has a personalized system that works and accomplishes this goal. A more standardized and central document is being made now to ensure that a replicable system is in place if the Investigator/Auditor were to be out of the office for an extended period. This information is also tracked in the AIM system and, previously, was tracked by running periodic reports. FPC is now concerned with creating a second, in-house tracking procedure as another safeguard.
- Police District Stations distribute FPC-created materials with complaint filing methods clearly explained and the MPD website does have a list of dedicated complaint intake contacts, including an email address. This can be viewed on the MPD website by clicking on the “Citizen Complaint” link.⁵²
- On **March 25, 2020**, CJI, alongside FPC, presented at the Judicial and Legislative Committee their six-month progress report related to compliance of the ACLU Settlement Agreement.⁵³ The FPC Risk Auditor has created extensive, detailed audit related documents to carry out the review of MPD and FPC complaints, as well as the dash cam and body cam audits of traffic stops, field interviews, no-action encounters, frisks, and searches, so that, when it is reasonably safe in relation to the ongoing public health crisis, this review can begin.

Implementation Timeline: The FPC staff will work with the FPC Rules Subcommittee to audit and make recommended changes as needed to the FPC Rules. All 16 FPC rules should be audited and reviewed by December 31, 2021 as the FPC hires additional Auditors.

⁵² Appendix L: Citizen Complaint link on MPD Website: <https://citv.milwaukee.gov/Directory/police/Information--Services/Citizen-Complaints.htm#.Xn4p6YhKgdU>.

⁵³ The agenda, minutes, and video of this meeting are available on Legistar, the City of Milwaukee’s access point for legislative information: <https://milwaukee.legistar.com/DepartmentDetail.aspx?ID=2003&GUID=4141A680-BE2E-4C90-A89B-FABE165F2813>.



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D. Organizational Structure and Professional Development

Recommendation #8 – Develop and implement an internal control system to help staff adapt to a shifting environment, evolving demands, changing risks and new priorities.

As previously noted, the FPC has had significant leadership changes over the last two years, as well as staff departures. Since September 2019, the current Executive Director has assessed the FPC operations and staff, re-evaluated the organizational structure of the department and made key hires necessary for the overall operations of the department.

While the fast-paced environment of the FPC is constantly evolving, the Executive Director has put in place various systems to aid in the support of all staff. With weekly staff meetings occurring since September 2019, staff are kept up-to-date on all operations of the overall FPC department, included but not limited to: Testing, Recruiting, Investigations, Community Engagement, the ACLU Settlement Agreement, Emergency Management and Communications, Research and Audits; as well as general operational updates by management staff. In addition, each staff meeting provides a health and wellness component and/or professional development session led by two FPC staff members: the Paralegal and/or Program Assistant I; this in turn gives leadership opportunities to these two employees. To foster a healthy working environment, the Executive Director has enlisted the support and leadership of the Employee Assistance and Resource Coordinator on various presentations at multiple staff meetings.

Currently the FPC has several vacancies that the Executive Director is working on filling with the support of DER. In addition to bringing in new staff, the retention of existing staff is equally as important. Any separations, whether voluntary or involuntary, the FPC has endured over the last seven months, followed compliance with any and all laws, City rules and the guidance of DER.

The management team works closely and regularly with DER to post job vacancies. The Executive Director works closely with DER on any staff classifications. Unfortunately, due to the pandemic of COVID-19, several meetings have been postponed; once re-scheduled, classifications of several FPC positions will be continued. DER is a great partner organization in helping guide FPC on city processes for hiring and provides assistance the FPC needs to move forward in filling existing vacancies.

As previously referenced, since **September 26, 2019**, the FPC has had weekly staff meetings. All employees have signed work rules to clear up confusion as to the daily work expectations and functions of the FPC office. Performance metrics that were lacking in the FPC department have been implemented to aid the department towards continued success. Some of the staffing issues that are now being addressed have been long-standing in the FPC department. A clear focus and priority is being made to aid employees understand the value they bring to the department, the role they play and how their success is invaluable for the success of the entire department.



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The Executive Director, at the suggestion of CJI, enlisted the consulting services of Mr. Brian Maxey, J.D., Principal of Modern Policing,⁵⁴ to do an organizational assessment of the FPC department, with a specific focus on the Risk Management and Audit units for the planning and development of an Audit unit for aiding in the compliance of the ACLU Settlement Agreement. Mr. Maxey visited the FPC in January 2020 and has presented a draft to the Executive Director for review. In the draft report, it is noted that staffing additions are necessary as well as organizational restructuring, trainings for Investigator/Auditors and increasing the number of Auditors within FPC, while offering professional development opportunities as well as regular staff retreats.

With new leadership, change is necessary. Sometimes changes are necessary to ensure that departments are operating at their full capacity and deficiencies are addresses early on. With changes come growing pains and reassessment; leading at times to shifting of priorities which in turn can delay deliverables. Managing expectations of key stakeholders and organizations the FPC works with is key. Constant communication in necessary with all interested parties to ensure proper expectations are managed and questions/concerns can be addressed in a timely fashion and transparency can be achieved.

Implementation Timeline: In the short term, the staff meetings that were implemented on September 26, 2019, and have consistently occurred, should satisfy this recommendation. However, Mr. Maxey's report will add further value to the FPC and most of Mr. Maxey's recommendations will be implemented by March 31, 2021.

⁵⁴ Appendix M: Modern Policing, The Maxey Group: <https://modernpolicing.com/>.



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E. Professional Development and Training

Recommendation #9 – Require the attainment of professional development, training and related continuing education for critical functions.

The FPC staff participates in trainings provided by the City of Milwaukee as well as outside events and seminars. The Investigation and Audit units participated in a law enforcement audit training provided by the Los Angeles Police Department (LAPD) in relation to the ACLU settlement on September 9-11, 2019. The units did receive Continuing Professional Education credits (CPE's) as a result of this training. On November 15, 2019, the FPC Recruiter attended the National Association of African Americans in Human Resources (NAAHR) Diversity, Inclusion and Equity Conference. On March 6, 2020, five FPC team members attended the University of Wisconsin-Milwaukee Women Leaders Conference. On March 17, 2020, two FPC team members attended a training with the City Clerk on Legistar in an effort to act as backups to the Program Assistant I and the Office Assistant II, as well as cross-train and gain a better understanding on how FPC regular and committee meeting agendas come together. There are also several team members who are taking advantage of the City's tuition reimbursement program to further their own education in relation to their careers while working for the FPC and the City of Milwaukee.

As members of the State Bar of Wisconsin, both the Investigator/Auditor assigned to the ACLU Settlement Agreement and the Executive Director are required to participate in Continuing Legal Education (CLE) programs to maintain their law licenses. The FPC Risk Auditor is a member of the Association of Certified Fraud Examiners (ACFE) and the Institute of Internal Auditors (IIA). As membership opportunities arise, the FPC will continue to evaluate them to ensure they are in line with FPC's departmental operations.

The FPC has been a member of the National Association of Civilian Oversight of Law Enforcement (NACOLE) since 2007; yearly attendance to the conference are budgeted for either an FPC Commissioner or an FPC staff member to attend. In the past, the FPC has also held memberships with the Wisconsin Emergency Management Association (2018) and Association of Public Safety Communications Officials International (2019).

The FPC has begun creating several manuals for each departmental unit. For example, a Testing Manual and a Legistar Manual were created in 2019. The FPC work rules memorandum was created in September 2019, to assist seasoned and new employees understand departmental roles, responsibilities and expectations. All training suggestions that the Inspector General has recommended will be taken into consideration.



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Implementation Timeline 1: After additional staff are hired, FPC will plan and hold a facilitated all-staff day retreat to stress organizational goals and priorities, introduce common training topics, and build a sense of common purpose. To be completed by November 30, 2020.

Implementation Timeline 2: FPC will also review with DER formal trainings that would benefit FPC staff as it relates to Testing, Recruiting, and other pertinent FPC functions. To be completed by November 30, 2020.

F. Access Controls

Recommendation #10 – Develop and implement access controls over physical files, systems, applications and databases.

The FPC office utilizes a separation checklist that is provided to City Departments by DER⁵⁵ to ensure that Departments remove access to all departmental files including but not limited to, confidential candidate files, upon departure from departmental employment. FPC follows Citywide implemented policies. DER issued a memo on December 27, 2019 about a policy Protecting Personal and Private Information.⁵⁶ FPC follows this protocol as it relates to access to physical testing files, systems, forms, applications and databases.

FPC did meet with the City's records retention team on November 11, 2019 to begin creating records retention processes along with the organization of sensitive testing materials to be organized in the assigned FPC vault. This project is on-going and managed by the Chief of Staff and executed by the Program Assistant III, Program Assistant I and the Office Assistant II.

Implementation Timeline: On-going evaluations and assessments are made regarding staff access to internal FPC databases, as well as external FPC databases. Records retention project is on-going with a scheduled completion date of December 31, 2021.

⁵⁵ Appendix N: DER Separation Checklist.

⁵⁶ Appendix O: Memo from DER regarding Protecting Personal and Private Information Policy.



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Recommendation #11 – Develop and implement a policy and procedure regarding City-issued cell phone and mobile device management and utilization.

Departmental issued cell phones that have been distributed, recently or in previous years, were done so in accordance with the City's established and well-documented cell phone policy⁵⁷ that governs FPC cell phone usage. Department or division telecommunications coordinators recommend who qualifies for a City issued cellular device based on department needs (Pg. 2, Sec. 7).⁵⁸ Upon issuance of a cellular device, this policy demands that City devices be secured with a pin (pg. 1, Sec. 3)⁵⁹ to safeguard data. Additionally, this same policy:

1. Prohibits the use of City devices for personal use (pg. 2, Sec. 5).⁶⁰
2. Explains the storage by and property interest of the City in any usage of a city issued device (pg. 2, Sec. 8).⁶¹
3. Affirms the use by the Information Technology Management Department (ITMD) of mobile device management software to enforce usage guidelines and prevent tampering with programs on City issued devices (pg. 2, Sec. 10).⁶²
4. Makes it clear that City employees are responsible for securing their device from loss or damage and the City can take disciplinary action for a failure to take this responsibility seriously (pg. 2, Sec. 11).⁶³
5. Designates ITMD as the sole source for mobile device purchase, billing coordination, and activation (pg. 3, Sec. 12).⁶⁴

Additionally, it is the responsibility of ITMD to monitor usage and report issues to the user immediately so that they can be rectified (pg. 3).⁶⁵ When an employee separates from employment, they are required to return their city-owned device to the department and, in the event that the device is not likely to be used for further city business, it should be returned to ITMD (pg. 3).⁶⁶

In short, City-issued devices issued to FPC employees were distributed and are monitored according to established policies that are largely the domain and responsibility of ITMD and, thus, ITMD is the primary point of contact for any user issues, management questions regarding technology, or requests related to City issued technology.

⁵⁷ Appendix P, Mobile Device Management Policy, June 6, 2018.

⁵⁸ Ibid.

⁵⁹ Ibid.

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² Ibid.

⁶³ Ibid.

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Ibid.



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As an additional layer of oversight, the FPC Chief of Staff and Program Assistant III review cell phone and data usage monthly for all of the 14 (five are newly added for FPC Commissioners) active cell phone devices. Please note that on February 6, 2020, the FPC issued Commissioners cell phones. Out of the seven Commissioners, only five opted-in to have cell phones. This data usage will also be reviewed monthly.

Implementation Timeline: The additional layer of oversight by the FPC Chief of Staff and Program Assistant III reviewing all department issued cell phones usage on a monthly basis and all of the ITMD policies enforced, the FPC believes that this recommendation should be closed.

Recommendation #12 – Develop and implement a standard “Business Needs Evaluation Approval” and “Deactivation” form.

This recommendation ties directly to Recommendation #11. FPC uses the separation check-list that is provided by DER⁶⁷ and included on that form is the collection of any City-issued cellular device.

Implementation Timeline: Please refer to Recommendation #11's response. The FPC believes that this recommendation should be closed.

Recommendation #13 – Develop and implement documented, comprehensive internal controls and processes to comply with city-wide purchasing policies, procedures, and applicable rules and regulations.

The FPC has had long-standing relationships with many vendors dating back to 2013.⁶⁸ Most of these contracts have been vetted through the purchasing department's policies and procedures,⁶⁹ and others have not. This precedes the current Executive Director. This recommendation refers to two specific contractual agreements:

- A. The Executive Director executed a professional service contract, beginning October 1, 2019⁷⁰, with a Public Relations Consultant; however, the Purchasing Division had no prior knowledge regarding the execution of the contract and was not involved in the execution of the contract.⁷¹

⁶⁷ Ibid.

⁶⁸ Appendix Q: FPC Vendor Listing from 2013-Present.

⁶⁹ Appendix R: Purchasing at a Glance document.

⁷⁰ Date is incorrect. The FPC executed contract on **October 3, 2019**; not **October 1, 2019** as cited in the audit report.

⁷¹ Inspector General cites a violation of Milwaukee Code of Ordinances 310-13-2 as the definition of a professional contract. <https://city.milwaukee.gov/ImageLibrary/Groups/ccClerk/Ordinances/Volume-3/CH310.pdf>



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- **B.** Professional service contracts to secure the services of an external rater to perform testing for promotional exams are established without the involvement of the Purchasing Department.⁷²

Regarding bullet point **A**; with not even 30 days in the role full-time, it was immediately apparent to the Executive Director that there was no dedicated communications support. A Public Relations Consultant was contacted. When the FPC entered into a contractual agreement with said vendor, the vendor was found in the system, but was inactive. The Program Assistant III reactivated the vendor.

Regarding bullet point **B**; all vendors, including external assessors are outlined in the attached spread sheet.⁷³ The statement that the FPC secures contracts for external assessors without involvement of the Purchasing Department is inaccurate. Many of these vendors who the FPC agrees to work with are related to the testing and recruiting activities. An audit and summary of the recruiting and marketing expenditures was requested by the Executive Director and provided by the Program Assistant III on January 10, 2020 dating back to 2017.⁷⁴

Implementation Timeline: On-going evaluations and assessments of all FPC contracts and vendor agreements are and will be evaluated on an on-going basis to comply with administrative requirements from the Purchasing Department. Review of contracts and agreements are on-going with a scheduled completion date of December 31, 2021.

⁷² Appendix S: Contracts the FPC engaged with the involvement of the Purchasing Department, which includes outside examination assessors.

⁷³ See Appendix S.

⁷⁴ Appendix T: Summary of Recruitment and Marketing costs from 2017 to 2019.

Appendix

A



Office of the City Clerk

Jim Owczarski
City Clerk
jowcza@milwaukee.gov

Ronda M. Kohlheim, MBA
Inspector General
State of Wisconsin, Notary Public
ronda.kohlheim2@milwaukee.gov

December 16, 2019

Griselda Aldrete, Executive Director
Office of the Fire and Police Commission
200 E. Wells Street, Room 706
Milwaukee, WI 53202

Dear Ms. Aldrete:

The City of Milwaukee's Inspector General intends to perform an audit of internal controls over monitoring and investigations of citizen complaints and recruitment, testing and hiring processes administered by the Fire and Police Commission. The preliminary objectives of this audit are as follows:

1. Evaluate the adequacy of internal controls, policies and procedures over the Fire and Police Commission's processes.
2. Determine whether the FPC investigates citizen complaints:
 - Properly, by investigating complaints within its jurisdiction and closing proper conduct cases immediately when appropriately based on information contain in the complaint.
 - Thoroughly as stipulated in the FPC guidelines for investigation of citizen complaints.
 - Within the timeframe required by guidelines, policy and procedure, Wis. Stat. and City Charter.
3. Evaluate whether the FPC is effectively managed to achieve its mission.

The scope of this audit includes examining internal controls over investigating and monitoring citizen complaints and recruiting, testing and hiring processes administered by the FPC. Where applicable, the audit will cover the most recent 12 months.

Specifically, I will review:

1. Processes and internal controls over monitoring and investigation of citizen complaints;
2. Policies and procedures; and
3. Recruitment, testing and hiring for positions within the Fire and Police departments.



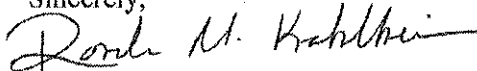
The audit scope excludes:

1. The FPC oversight of the Fire and Police department internal policies and procedures.
2. Disciplinary appeals from members of the Fire and Police departments.
3. Disciplinary actions for members of the Fire and Police departments for misconduct, or rule violation.
4. The FPC community outreach and education activities.
5. The Office of Emergency Management and Communications.
6. Monitoring and research of Fire and Police departments operational initiatives.

Audit activities will consist of process walkthroughs and observations to understand key processes, risk and controls; review of internal policies and procedures; and testing of controls.

I will be in contact with you to set up an entrance conference and begin the initial procedures of the audit. I am looking forward to working with you. If you have any questions about this matter, please contact me at 286-2146.

Sincerely,



Ronda M. Kohlheim, MBA
Inspector General

cc: Ashanti Hamilton, President of Common Council
Jim Owczarski, City Clerk

RMK

Appendix

B

City of Milwaukee
City Clerk – Inspector General
Audit of Fire and Police Commission
Entrance Conference Agenda

Date: December 23, 2019

Time: 1:00 PM

Location: City Hall, Room 303

I. Attendee(s):

Fire and Police Commission:

- Griselda Aldrete, Executive Director

Department of Employee Relations

- Maria Monteagudo, Director

Office of the City Clerk

- Ronda M. Kohlheim, Inspector General

Optional Attendee(s):

- Peter Block, Assistant City Attorney

II. Agenda Topics:

- a. Audit objectives and scope¹

Objectives:

1. Evaluate the adequacy of internal controls, policies and procedures over the Fire and Police Commission's processes which ones?.
2. Determine whether the FPC investigates citizen complaints:
 - Properly, by investigating complaints within its jurisdiction and closing proper conduct cases immediately when appropriately based on information contain in the complaint.
 - Thoroughly as stipulated in the FPC guidelines for investigation of citizen complaints.
 - Within the timeframe required by guidelines, policy and procedures, Wis. Stat. and City Charter.
 - I was unaware that citizen complaints is an issue- The current issues seemed to be related to vacancies, turnover, ACLU settlement compliance, using MPD as a resource in conducting investigations and investigation training, promotional tests and the availability of eligible lists.

¹ The Inspector General reserves the right to modify the proposed scope, if warranted, and to evaluate other areas that may come to my attention during the course of the audit.

- * I also think that an important element of the audit should be the internal controls in place to ensure that assistance in testing function does not equate to the MFD or MPD controlling or dominating processes.
- * I also believe that as new Commissioners who are former members of MFD and MPD are asked to serve as members of the Board, there should be rules of conduct that require them to recuse themselves from any process (disciplinary appeal, background appeal, discussion about disqualifiers, and other employments aspects) with any potential of current member of the force.
- * Given the litigious nature of hiring and promotion practices in public safety and the limited knowledge and experience of the current staff in this field, controls in the form of legal representation or testing and measurement experts (contractors of DER staff) should be consulted when the Board is discussing and deliberating changes to min reqs, testing processes and components, rating dimensions, Etc etc

3. Evaluate whether the FPC is effectively managed to achieve its mission.
Can we please discuss this? What standards do you intend to use in defining "effective". To what extent will this include a review of the Board's involvement or interest in managing staff or staff activities that re not related to policy or operational oversight?

Scope: The scope of the audit will include internal controls over investigating and monitoring citizen complaints and recruiting, testing and hiring processes administered by the FPC. Where applicable, the audit will cover the most recent 12 months.

Specifically,

1. Processes and internal controls over monitoring and investigation of citizen complaints;
2. Policies and procedures; and
3. Recruitment, testing and hiring for positions within the Fire and Police departments. This is too general. What about the testing? The roles and responsibilities of the staff, the vendors, the hiring depts.????

The adequacy of review and vetting processes of changes suggested by Commissioners who are not trained on the UGESP? The impact of changes to the matrix developed as a result of the DOJ settlement, the ARC process and decisions, the Board overruling candidates who are clearly rejected based on demerit points from the matrix, the use of one vendor for psychological exams,.....I can go on forever....

3.

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b. Other areas for audit scope consideration

c.
b.

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d. Management of findings and recommendations identified during the audit

e. Information gathering

- Internal Policies and Procedures
- Monitoring and Investigation Guidelines
- Wis. Stat. 62.50
- Milwaukee City Charter Ch. 314
- Industry Best Practice
 - National Association for Civilian Oversight of Law Enforcement (NACOLE)
 - OIR Group
 - U.S. Department of Justice; Office of Justice Programs
 - National Institute of Justice (NIJ)

f. Primary audit contacts

g. Tentative audit timeline

- Scoping: currently in process
- Process Walkthroughs: December 2019
- Risks and controls (identification and analysis): concurrent with walkthroughs
- Fieldwork²: December 2019 / January 2020
- Wrap up and reporting: February 2020

g. Distribution – Internal Audit Fundamentals and Standards document

² Fieldwork will require the Inspector General access to all information, data, records and reports relevant to the scope and objectives of the audit.

Appendix

C

Investigator/Auditor - met with Inspector General January 10, 2020

Risk Management Manager - met with Inspector General January 14, 2020

Human Resources Representative - met with Inspector General January 8, 2020 and January 16, 2020

Human Resources Analyst – Senior - met with Inspector General January 3, 2020 and January 17, 2020

Recruiter- met with Inspector General February 4, 2020

Community Education Assistant- met with Inspector General January 2, 2020

Appendix

D

Majewski, Tammy

From: Aldrete, Griselda
Sent: Tuesday, March 31, 2020 3:42 PM
To: Majewski, Tammy
Subject: FW: FPC Summary
Attachments: FPC Audit Summary Final.pdf

Importance: High

Print and attachment as well.

Griselda Aldrete
Executive Director
Milwaukee Fire and Police Commission



Be COUNTED in the 2020 Census!
milwaukee.gov/2020Census

From: Aldrete, Griselda
Sent: Wednesday, March 4, 2020 6:34 PM
To: Kohlheim, Ronda <Ronda.Kohlheim2@milwaukee.gov>
Cc: Montegudo, Maria <MMONTE@milwaukee.gov>; Owczarski, Jim <jowcza@milwaukee.gov>
Subject: FPC Summary
Importance: High

Ronda,

Per our first meeting this past Friday, February 28th at 2:30 p.m., you requested I send you a summary of FPC's current activities. I also included a summary review of 2019 which includes Police Officer and Fire Fighter classes and how many commission and committee meetings we had.

I look forward to our exit interview this upcoming Monday, March 9th at 1 p.m. with Maria and Jim.

Thank you,
Griselda

Griselda Aldrete
Executive Director
Milwaukee Fire and Police Commission



Fire and Police Commission

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MEMORANDUM

To: Ronda M. Kohlheim, Inspector General
From: Griselda Aldrete, Executive Director
Date: 3/4/2020
RE: FPC Summary as requested by the Inspector General on first meeting, Friday, 2/28/2020

ORGANIZATIONAL OPERATIONS & ADMINISTRATIVE SUPPORT

At the direction of the Executive Director, the Chief of Staff Tammy Majewski helps lead this section. This team focuses on the day-to-day administration of the office as well as the Fire and Police Commission Meetings. She helps to manage three staff members: Renee Keinert, Elizabeth Moore and Jasmine Agraite.

- This team is responsible for compiling documents for the Commission and both the Fire and Police Departments.
 - This team also attends all full Board sessions of the Fire and Police Commission as well as Committee meetings (4 committees total) and take notes, handle public questions and commentary. After meetings, this team also types up the verbatim meeting minutes as well as creates the meeting minutes for approval by the Commission and posted on Legistar.
- Members of this team also track absences in City Time to ensure correct time entry records.
- This team also processes invoices for payments from vendors.
- Team members are the public facing team as they answer incoming calls from the public.
- This team is also responsible for the onboarding of new staff and handling staff resignation and exit interviews.



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EMERGENCY MANAGEMENT AND COMMUNICATIONS

Kyle Mirehouse, Director of Emergency Management/Homeland Security & Communications who is a Mayor Barrett appointee and cabinet member leads this section.

- Kyle is responsible for developing an emergency management for the City of Milwaukee in the case of a natural disaster or human caused disaster (i.e., gas leak/explosion, terrorist attack, bombing).
- Kyle is also the key cabinet member coordinating the DNC security.
- Kyle is working with consultants and other city leaders to plan and execute the CAD (911) system conversion from a dual system to a singular system. This means that calls will no longer go to police or fire – a 911 operator who are trained in both fields will now receive them. This will create better efficiencies as well as reduce 911 call times for the community.
- **Comprehensive Emergency Management Program (CEMP):** The CEMP establishes a unified command and control structure for mitigation, preparedness, response, and recovery operations for all City departments and its stakeholders. The CEMP is the central document that guides the COOP and department-specific EQ/APs. The latest Council approved/Mayor-signed version of the CEMP was in 2016. This plan should be annually reviewed.
 - Over the next 6-8 months we will be working with every City department, Common Council, and over 40 other entities who have responsibilities listed within the CEMP to review their obligations within the plan to ensure they are still capable of accomplishing their tasks. This is largely completed by reviewing the intention and composition of the CEMP to each stakeholder and then working with them to confirm current capabilities and limitations.
- **Continuity of Operations Plan (COOP):** An annex of the CEMP the COOP is the plan that outlines how each City department will perform essential functions under a broad range of circumstances. Essentially, how will each department function outside of City Hall at an alternate site and/or virtually, if at all.
 - To accomplish this, we have to first educate each department on what the COOP is and its value and then Kyle needs to guide them through "auditing" their own department's processes. We must understand each function of each department and their priority order, software/hardware needed, staffing requirements, and infrastructure needs. While we wait for the data from each department Kyle will be working to identify alternate sites to locate 1 or all departments should we need to activate the COOP. Note: The COOP can be activated by individual departments or even sub-departments, it doesn't have to a City-wide event.



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- **Continuity of Government Plan (COG):** The COG is a component of the COOP, but focuses specifically on Milwaukee City Government functions. While the COOP will address nearly all of the logistical needs for each stakeholder, the COG will address the obligations of the administration to include the Common Council. Think, essential City services and how we keep services and order in the City should we need to relocate (emergency situation or not)
 - This process is more delicate than the COOP because it takes high level and legal guidance on the City services that we intend to keep operating and at what level of priority. Kyle will be working with the Mayor's office and Common Council to round out the additional needs to complete the COG aspect of the COOP.
- **Emergency Operation/Action Plans (EO/AP)**
 - The CEMP has several annexes that outline scenario-specific plans that detail that actual operational instructions. Examples include: evacuation, severe weather, unknown substance etc. All of these plans need to be updated/created. This process involves taking the lead emergency service entity's (MPD, MPD, FBI etc.) SOPs for each given scenario and adding how each City department should respond. For example, what should DER do when there is a tornado warning? What does grants administration do when there is a suspicious package in the lobby? How will they be notified? Etc. etc. Not only is there a more robustly detailed element in the CEMP...we will also have a 1-page document with basic instructions for most (if not all) expected scenarios.
- **Hazard Mitigation Plan:** The hazard mitigation plan was approved this year by the Common Council. It is "good" for 5 years with roughly a 1-5-2 year review & approval process to begin again in 2023. It is required to obtain federal funding in disaster recovery, but more importantly it provides an outline how we are mitigating known and expected hazards to reduce impact on residents and cost of recovery efforts. The core focus of the next 4 months of work with this plan is to ensure that its contents are correlated to the CEMP as it is updated.
- **Democratic National Convention (DNC):** Kyle personally attends and/or receive briefs on nearly a dozen sub-committees as they continue to plan and exercise. The central function of Kyle's role is to ensure that the public safety preparedness elements to each subcommittee are connected in focus and to the best of his ability...ensure they are not being redundant in their work. The DNC is probably 50% of Kyle's work at this time, which isn't a negative fact because many of the conversations and planning sessions we are having for the DNC directly correlate to most other emergency situations.



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- **Emergency Operations Center (EOC):** The primary EOC is located at MPD District 3. The EOC concept is comprised of two sub-genres: infrastructure & people. Kyle has been and will be working with MPD/MFD (primarily) to refit the EOC with new tables, chairs, TVs, IT, etc. This will continue for the next couple of months. A component of the CEMP is the training of all personnel listed in the plan on general emergency management practices, which include how the EOC operates when it's activated. The education and training of stakeholders on EOC operations is its own entity. Likely, we will not have the time to exercise in full in the next 4 months, but without question the planning for EOC operations with each department will be coupled with the same conversations revolving around the CEMP updates. This ongoing training topic will never end.
- **Communications:** The third component to Kyle's role is communications.
 - **911 System:** Will be working with the ESC and others on how best to leverage this new system. Specifically, training on new software and maximizing the GIS capabilities.
 - **Computer-Aided Dispatch (CAD):** This will be one of the heaviest lifts from a time perspective. In the next 4 months, the focus will be to developing an end state organizational structure and working towards getting a vendor decided upon so once the DNC is over we can get right into the work for consolidation.
 - **Mass Communication:** Working with ITMD and purchasing on the acquisition of a new mass communication software. Mass communication is a critical tool in emergency management and is relevant in all phases of the industry. Kyle will be working to establish City internal policies and procedures for alerting all stakeholders as emergency events occur. This will require all stakeholders to be involved in the planning and implementation portions of the project.
- **Cross-Training:** Kyle has started to integrate a small cross-training regime with some departments he regularly interacts with. The goal is to best understand how OEM/HS can support their operations and how they plug into the big picture for preparedness and response. The next 4 months and beyond Kyle will be speaking in as much cross-training time as possible.
 - **MPD:** Kyle is working with MPD with the aspects of fusion center, Southeastern Wisconsin Threat Analysis Center (STAC), and dispatch.
 - **MFD:** Kyle is working with MFD dispatch, tech services, special operations, and ride-alongs.
 - **DPW/MWW:** Kyle has and will continue to tour and learn the critical infrastructure that DPW oversees. Waterways, filtration, bridges, transportation, etc.



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- **Media & Community:** A core component to community preparedness is education. As much as Kyle can connect with the City residents and ensure they have the proper expectations for emergencies the better off we are, obviously, but it makes dramatic difference.
 - **Website:** Over the next 4-months, Kyle will be working with the FPC Executive Director and Public Relations team to develop an online presence so the City has a voice for emergency management, homeland security, and communication.
 - **Outreach:** Kyle will be starting to attend MPD community evening events to talk to and answer questions from the public. Kyle plans to begin these in March and April as they told him they get more citizens to attend as it gets warmer outside.
- **Emergency Management Accreditation Program (EMAP):** Essentially, the EMAP certification is the gold-standard for emergency management programs. The program as a whole encompasses all of the tasks listed above and others. Kyle will be having in depth discussions regarding this as we will need commitment from MPD/MED (plus more) Chiefs, but the best in the EM profession will compare our EM operations against 64 industry standards and give us a grade, hopefully earning a certification. Only 7-8 other cities have this designation. The next 4-months Kyle will be working to garner the buy-in and use the tasks above to start checking the necessary boxes for the evaluation.
- **Public Health:** Assisting the Public Health Department in preparations for potential COVID-19 impact. Contingency city-services planning & COOP/COG operations are the primary focus.
- **Shelters:** Kyle has also begun to correlate stakeholders to revamp operations aimed at adding additional shelters for emergency use in the City/County. Kyle is working with City, County, State, and private partners to develop as many accessible shelter locations as possible. This is an ongoing effort.
- **Recent Response:**
 - Federally declared disaster to flooding: Assisted with the response and damage assessment program that led to the State of Wisconsin in declaring a state of emergency to facilitate the U.S. Government's financial support.



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RISK MANAGEMENT & RESEARCH

- Kari Gipson who is the Risk Management Manager manages this team. She manages the risk auditor and research/policy analyst.
- This section is tasked with developing and executing audits to achieve ACLU agreement compliance – this is an ongoing process. Also, work with the legal compliance coordinator to help achieve overall compliance.
- The team is also responsible for researching and writing the “Use of Force Report,” “Vehicle Pursuit Report” and “Citizen Satisfaction Report.”
- This team also provides research support for the Fire and Police Commission as needed.
- MFD/MPD Health and Wellness Report
 - Meeting with Asst. Chief Lipski occurred on 02/21/2020. He provided handouts of current policies, procedures and best practices; and information of the peer advisor network, chaplain services and the health and safety manager.

LEGAL

- Niko Triggs, our Paralegal, is an integral member of this team. She receives and responds to all open records requests. Niko also administers the disciplinary appeal hearings for both the Fire and Police Departments with the assistance of an outside hearing examiner.
- Since January 1, 2019, there have been a total of 12 Appellants with Disciplinary Appeal Matters
 - 11 cases gained compliance within 6-months of the reported violation of the requirement.
 - January 1, 2019 through December 31, 2019, there have been a total of 13 Residency Cases requiring FPC Board intervention of which 6 currently remain open.
 - January 1, 2019 through December 31, 2019 there were a total of 137 open records requests all of which were disposed of on or before December 31, 2019.
 - We have 6 Disciplinary Appeals already scheduled for this year. Three in April, two in June and one in July



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Jack McNally also works on this team and his primary focus is the ACLU Settlement Agreement and moving not only the FPC toward compliance but also the City as a whole.

- o Jack has weekly calls with the CII consultant who is helping us with the settlement agreement.
- o Jack works closely with the Auditor on the Risk Management Team to make sure that the required audits are being completed.
- Specifically:
 - o Tracking and organizing compliance efforts through constant contact with the CII (the monitoring agent), MPD, and the City Attorney's Office.
 - This is largely done through a tracking table document that is updated and revised as goals are accomplished and shared with CII for feedback, approval, or guidance.
 - It should be noted that this type of document did not exist before Jack worked with CII to create one in November of 2019, the first month he was here. I have not seen anything to indicate that previous FPC management had thought to make such a tracking sheet or map progress towards compliance in any concerted way.
 - o Beyond organization, Jack is also often doing the actual tasks that he is organizing as a component of overall FPC compliance. For example:
 - He worked with the investigator to deliver complaint materials to Milwaukee Public Libraries;
 - He took a day to visit each district station, meet each captain, and supply them with complaint materials;
 - He works with the other units to compile materials to provide to CII as proof of compliance;
 - He redacts sensitive information from materials that are sent to CII;
 - And he works with administrative assistants to post quarterly stop data on the open portal
 - o The audits are becoming Jack's primary focus now and he is working with the Risk Auditor and Risk Manager to plan, structure, and prepare documents for the audits of stop data and footage, and citizen complaints.
 - Jack has taken the lead in discussing access issues with MPD and trying to streamline the process by which the audits are accomplished in practical terms



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- Jack and the Risk/Audit team are essentially starting this process from nothing, as little to no progress was made during the first year of the Settlement Agreement

Investigations

Diana Perez, is our bilingual investigator/auditor. She is bilingual in both Spanish and English. She is responsible for receiving and processing all incoming complaints against both the Police and Fire Departments (this includes telecommunications operations and school crossing guards).

- She also holds community hours several times a month at various locations in the community including community partners and Milwaukee Public Libraries.
 - During these hours she meets with citizens to take incoming complaints and also answers any questions in regard to the work of the FPC.
- She is currently handling all citizen complaints, inquiries and general requests for information that are received at the FPC. The number of complaints (including inquiries but excluding general requests) for 2020 are 43. Currently she has a total of 9 complaints open.
- She is also currently finding locations, scheduling and attending all community office hours (COH) for FPC.
 - January and February we held 6 different COH events at the following locations:
 - January 14 Mitchell Street Library (2-4)
 - January 24 Mitchell Street Library (2-4)
 - January 30 Atkinson Library (11-1)
 - February 3 Zablocki Library (2-4)
 - February 20 Villard Square Library (11-1)
 - February 27 Atkinson Library (1:30-3:30)
 - For the months of March and April we have 5 COH events at the following:
 - March 10 Tippecanoe Library (1:30-3:30)
 - March 24 East Library (1:30-3:30)
 - April 1 Capitol Library (1:30-3:30)



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April 14 Mitchell Street Library (1:30-3:30)

April 29 Villard Square Library (1:30-3:30)

- In the month of January, Diana assisted in dispersing brochures and complaint forms in English, Spanish and Hmong to all Milwaukee Public Library locations.
- Prior to September, 2019, FPC investigators did not have a community presence with set monthly community hours.

COMMUNITY ENGAGEMENT

Ana Diaz is our NEW full-time Community Outreach Coordinator. She is also bi-lingual in both English and Spanish.

- Ana was responsible for setting up the Chief Listening Sessions with Chief Morales.
- Ana has also planned the upcoming community listening session concerning Recruiting.
- Ana is also working with Alderman Murphy and his office as well as the Office of Violence Prevention to create a Reckless Driving Summit.
- She is working on community sessions relating to Domestic Violence, Gun Control, among other FPC and community related topics.

TESTING & RECRUITING

This office will have a staffing services manager starting on March 9th. This section is responsible for recruiting and testing to establish the eligibility lists for Police Officer, Police Aide, Fire Cadet, Firefighter, Fire and Police Promotional examinations, HEO and 911 Operators.

- These tests include a written portion, medical and psychological testing, physical readiness test, background interview, oral board and a written sample.
- Recruiting – handled by Kisha Buford, Jordan Dickerson and Ana Diaz and in partnership with the Fire and Police Department recruiters, they attend various events within the City of Milwaukee to recruit for the above named positions. These events include but are not limited to: college campuses; career fairs; high schools; and events that are directed toward our target demographic.



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- Responsible for candidate retention by reaching out and updating the candidates on the process and the status of the upcoming class. This is done via text, phone calls and emails.
- The recruiting team also works with the Fire Department, Police Department and the Girl Scouts to recruit campers to CampHERO.
 - This is a summer camp for girls to expose them to the protective services. The girls are able to train in various aspects of these careers.
- 2019 Police Classes:

PO Class	Actual # of PO
6/17/19	47

Police Aide Class	Actual # of PA
8/12/19	26

FF Class	Actual # of FF
07/29/2019	43

FC Class	Actual # of FC
08/26/2019	27

- 2019 Firefighter Class:
- 2019 Fire Cadet:

The following pages contain our current testing timelines that allow us to track our testing processes. There working documents and monitored on a daily basis.



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FIRE CADET:

ACTIVITY	DATE	Comments	Goal
(569 qualified candidates) Schedule date and obtain venues for writing exam	—	Casimir Pulaski HS (South): Cafeteria, March 18 th Safety Academy (North): Sgt. Quinlan reserved Room 182 & 182A, March 21st	Written Exam March 18 th (South Side), March 21 st (North Side)
Written exam invite via JobAps	February 28, 2020	Sent to 569 qualified candidates (self-schedule) 51 scheduled for South side location 111 scheduled for North side location	

FIRE CAPTAIN:

ACTIVITY	DATE	Comments	Goal
Eligible list approved Feb. 6 th	—	50 candidates for eligible list	MFD has list



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FIRE FIGHTER:

ACTIVITY	DATE	Comments	Goal
Career Review Board	February 26, 2020	35 Backgrounds for review	Career Review Board Pane 2/26/20: - Gerard Washington (retiree) - Jeff Gauthier - Kendria Donaldson
Background Appeal Requests	February 27, 2020	3 candidates have requested an appeal	Appeal Hearings
	TBD	Request sent for commissioners to hear appeals week of March 9	

FIRE LIEUTENANT:

ACTIVITY	DATE	Comments	Goal
Eligible list approved Feb. 6 th	-	48 candidates for eligible list	MFD has list



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DETECTIVE:

ACTIVITY	DATE	Comments	Goal
Oral Board Preparation	--	Written exam on Jan 22 nd . * 247 invited to take exam * 203 took exam; 43 no shows; 1 will take makeup exam due to mandated court	Oral Boards March 23-27
	February 28, 2020	PSI will be sending a final version of the Oral Board Instructions to send to the candidates by March 2 nd .	



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POLICE SERGEANT:

ACTIVITY	DATE	Comments	Goal
Written Exam	February 27, 2020	(327 qualified candidates – 1 on Military leave) (Timeline from PSI currently pending) Staff: -April -Jasmine -5 PSI staff -10 MPD staff	Written Exam at the American Serb Hall.



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POLICE LIEUTENANT:

ACTIVITY	DATE	Comments	Goal
Written Exam	February 28, 2020	(110 qualified candidates) -Timeline from PSI currently pending Staff : -April -Tammy -2 PSI staff -4 MPD staff (Police Aides)	Written Exam at the Safety Academy, Room 182/182A

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POLICE OFFICER:

ACTIVITY	DATE	Comments	Goal
<u>On-going:</u>	January 27, 2020	Initial email invite sent to Commissioners	Get availability of Commissioners during weeks of Feb. 3 rd -Feb. 10 th and/or Feb. 17 th
	January 29, 2020	No responses; follow-up email sent	
	February 4, 2020	Follow-up emails sent	
Background Appeals	February 10, 2020	Scheduling of commissioners confirmed (DeVougas, Wilson (afternoon), Robakowski, Cocroft (Day))	Sixteen (16) appeal hearings scheduled for Feb. 21 st .
	February 17, 2020	Background fail notices were sent	
	February 21, 2020	Appeals heard	
MMPI		Still receiving MMPI and medical results	MMPIs scheduled Jan. 28 th - Feb. 17 th
<u>New Activity:</u> Preference Points	February 28, 2020	Spreadsheet will be started to capture preference points for ALL PO candidates.	Obtain accurate calculated preference points that will be added to the final scores.



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POLICE OFFICER (Additional 50 Candidates):

ACTIVITY	DATE	Comments	Goal
Oral Boards		50 invited, 41 responded, 9 no shows, 32 actual participants 21 passed WSE Scores from Oral Boards should be released to FPG (will follow up Feb. 24 th if results not received yet). PSI will confirm how additional candidates ranked in comparison to the big group. Will follow up on results March 2 nd .	Scoring of Oral Boards from Feb. 10 th .
PRT	February 21, 2020 February 28, 2020	22 candidates Staff Goal (20): -April -Ana -Kischa -Jasmine -Jordan -Mike -Tammy -Jack -10 MPD Instructors/staff	<u>Pettit Center:</u> 12 pass 3 fail 1 medical hold 1 intent to take at WCTC *Candidates have until 3/2/20 to successfully complete the PRT and provide certificates.
Preference Points		Spreadsheet will be started to capture preference points for ALL PO candidates.	Obtain accurate calculated preference points that will be added to the final scores.



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Name: Angela McKenzie
Email: amcken@milwaukee.gov
Phone: [REDACTED]

Name: Anna Wilson
Email: anwils@milwaukee.gov
Phone: opted out

Name: Everett Cocroft
Email: ecocroft@milwaukee.gov
Phone: [REDACTED]

Name: Fred Crouther
Email: fcrouth@milwaukee.gov
Phone: [REDACTED]

Name: Nelson Soler
Email: nsoler@milwaukee.gov
Phone: opted out

Name: Raymond Robakowski
Email: rayrob@milwaukee.gov
Phone: [REDACTED]

Name: Steven DeVougas
Email: sdevou@milwaukee.gov
Phone: [REDACTED]

FPC COMMISSIONERS

*FPC ISSUED CITY EMAILS AND PHONES TO COMMISSIONERS ON FEBRUARY 6, 2020.

200 East Wells Street, Room 706, Milwaukee, Wisconsin 53202 • Phone (414) 286-5000
Fax (414) 286-5050 • Testing Fax (414) 286-5059
E-mail: fpc@milwaukee.gov • www.milwaukee.gov/MILWAUKEE



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STANDING COMMITTEES AND ASSOCIATED SUBCOMMITTEES (C) SIGNIFIES CHAIR (VC) SIGNIFIES VICE CHAIR

1. **Research**—this committee was formed as a follow up to the Police Satisfaction Survey conducted by the University of Wisconsin-Milwaukee in 2014. This committee could recommend follow up surveys on an annual or bi-annual basis. This committee would explore more areas in detail and follow up on some of the issues and problem areas that emerged from the last survey.
(3/27/2015 Meeting Minutes)
 - a. Cocroft (VC), Crouther, DeVougas (C), Wilson
 - i. **FPC Rules Subcommittee (NEWLY CREATED 1/9/2020)**
 1. Committee of the Whole
2. **Testing and Recruiting**-select members of the full board to provide deeper research and analysis of any issue that pertains to Testing and Recruiting. Recommendations of the committee are then brought to the full board.
 - a. Cocroft, DeVougas, McKenzie (VC), Soler (C), Robakowski
3. **Complaints and Disciplines**-select members of the full board to provide deeper research and analysis of any issue that pertains to Complaints and Disciplines. Recommendations of the committee are then brought to the full board.
 - a. Cocroft, Crouther, DeVougas, Wilson
 - i. **ACLU Subcommittee (NEWLY CREATED 1/9/2020)**
 1. Cocroft, Crouther, DeVougas, McKenzie, Wilson
4. **Policies and Standards**-select members of the full board to provide deeper research and analysis of any issue that pertains to Policies and Standards. Recommendations of the committee are then brought to the full board.
 - a. Cocroft (VC), DeVougas, McKenzie, Robakowski, Soler (C)



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In 2019:

44 Regular meetings were noticed, 1 cancelled = 43 meetings

5 Complaints and Discipline meetings were noticed, 5 cancelled = 0 meetings

8 Policies and Standards meeting were noticed, 5 cancelled = 3 meetings

4 Research meetings were noticed, 2 cancelled = 2 meetings

7 Testing and Recruiting meetings were noticed, 3 cancelled = 4 meeting



Appendix

E

VENDOR SERVICE CONTRACT

CITY OF MILWAUKEE
 Department of Administration
 Business Operations Division
 Procurement Services Section



CONTRACT NO.	B0000015001
DATE OF AWARD:	JUNE 29, 2017
PURCHASING AGENT:	KAREN JEFFRIES, CPPB
REQUISITION #	0000015001
ESTIMATED CONTRACT AMOUNT:	██████████
DEPARTMENT:	FIRE AND POLICE COMMISSION

DESCRIPTION:	VENDOR SERVICE CONTRACT FOR FIRE DEPARTMENT ENTRY-LEVEL AND PROMOTIONAL SELECTION PROCESSES		
CONTRACTOR:	INDUSTRIAL/ORGANIZATIONAL SOLUTIONS, INC.		
CONTRACT PERIOD:	JUNE 30, 2017 THROUGH JUNE 29, 2020 WITH TWO (2) ONE (1)-YEAR OPTIONS TO EXTEND UPON MUTUAL CONSENT		
RFP NO.	15001		
INSURANCE REQUIREMENTS?	<input checked="" type="checkbox"/>	YES	<input type="checkbox"/>
	<input type="checkbox"/>		<input type="checkbox"/>

CITY APPROVING OFFICER: RHONDA U. KELSEY, CITY PURCHASING DIRECTOR

TOTAL ESTIMATED AMOUNT OF CONTRACT: MAXIMUM AMOUNT OF CONTRACT NOT TO EXCEED AMOUNT: ██████████

THIS AGREEMENT, ENTERED INTO BY AND BETWEEN INDUSTRIAL/ORGANIZATIONAL SOLUTIONS, INC. HEREINAFTER REFERRED TO AS THE "CONTRACTOR"), AND THE CITY OF MILWAUKEE, A MUNICIPAL CORPORATION OF THE STATE OF WISCONSIN (HEREINAFTER REFERRED TO AS THE "CITY").

DURING THE TERM OF THIS CONTRACT, SCOPE CHANGES, MODIFICATIONS OR ADDITIONAL SERVICES MAY BE IDENTIFIED. ANY SUCH CHANGES IN THE SERVICES AND THE PRICES THEREFORE WILL BE AGREED TO IN WRITING BY THE PARTIES VIA AN AMENDMENT PRIOR TO PERFORMANCE.

Original: DOA-BOD-Procurement Services

Copies: Contractor, Comptroller, User Department

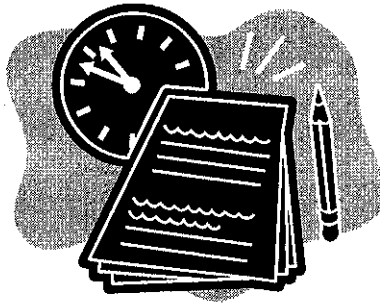
Ref: FORMS\Bid Cover Page, 20121219.docx



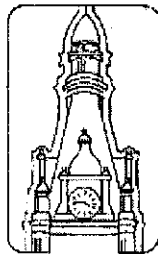
Appendix

F

Guide to the City of Milwaukee's Testing and Selection Process



City of Milwaukee



**Department of Employee Relations
200 E. Wells Street, Room 706
Milwaukee, WI 53202-3554**

General Office: 414-286-3751

TDD: 414-286-2960

Job Information Hotline: 414-286-5555

E-Mail: staffinginfo@milwaukee.gov

Web site: www.milwaukee.gov/jobs

R. 08/11/2010

INTRODUCTION

The purpose of this Guide is to orient you to the City's employee selection procedures and to improve your test-taking skills. The Department of Employee Relations uses job-related tests to measure an individual's ability to perform the job. Tests are competitive: higher scoring applicants have a greater chance of being selected because the knowledge, skills and abilities required to do well on the test are the same as those needed to perform successfully on the job.

The kinds of tests used to select City employees depend on the nature of a given job. For example, applicants for an accountant job may be rated on their training and experience and then take the written test. Applicants for an office assistant job take a written test and then a "performance" test in typing. Other applicants may be given oral tests by a panel of experts, while others must weld steel--it just depends on the job for which the opening exists. So there are four kinds of tests:

- **Training and Experience**
- **Written**
- **Performance**
- **Oral**

Both test questions and answers reflect the input of job incumbents, supervisors, managers, testing specialists and other people knowledgeable about the job and test construction (sometimes called "subject matter experts"). The kind of information these experts provide include the right and wrong ways of doing a task, the procedures and methods used, the technologies involved, critical aspects of the work, and the identification of tasks for which training is provided after a person is hired.

Written tests generally take from two to four hours to complete--this is to allow ample time to complete the entire test. If there is an additional test component such as a performance test, it is usually necessary to come back on another day to complete that part.

The Department of Employee Relations tries to provide test results within about 3-4 weeks--for some tests with large numbers of applicants, the time may be a little longer. If you pass the test(s), your name will be placed on an eligible list: you are eligible to be hired, but not guaranteed a position. Eligible lists are valid for at least 1 year and list candidates in order from highest to lowest passing score. Because of scheduling interviews and physical examinations, processing paperwork etc., the earliest a person may be hired after taking a test is about 3 weeks. If you change your address or phone number, please call our office at 414-286-3751 and let us know your new information; or send an email with the details to staffinginfo@milwaukee.gov.

FILLING OUT THE APPLICATION

Once you find a job that interests you and seems to fit your background, the next step is to fill out the application. *You must apply for a specific job title that is open at the time when you complete the application.* Since an application is the first part of the hiring process, it is important that you take the time to fill it out accurately and completely.

1. **Follow directions carefully** on the application so that your answers are correct and in the proper places. *Writing "See Resume" is **NOT** acceptable.*
2. **Take the application home if necessary**, as some questions on the application may take more time for you to answer or require information that you have at home.
3. **Print or type** the information NEATLY.
4. **Answer all questions**, even if it means using, "Does not apply," or "N/A." Attach all required information, such as college transcripts. For example, if you are a veteran, make sure your Form DD214 is attached and the "Military Service" section of the application is completed.
5. **Check all questions and answers** for correctness and completeness, then **sign the application**.
6. **Return the application before the filing deadline listed on the announcement sheet to guarantee consideration.**

RATINGS OF TRAINING AND EXPERIENCE

In ratings of training and experience, the background of the applicant is reviewed. Training and experience are evaluated in terms of their relationship to the job. This review provides a score that is used to determine a final ranking.

The information needed for the review is taken from the application and the training and experience questionnaire. It is important to fill out all of your application materials accurately and completely, but it is especially important when the test is a rating of training and experience. Remember that **THE APPLICATION MATERIALS ARE PART OF THE ENTIRE TEST**. Also, keep a copy of the application materials as a reference.

BEFORE TAKING A TEST

You will be notified of:

- The time, date and place of the test
- The required materials to bring to the test (*picture identification, calculator, etc.*)
- How long you will be given to complete the test

Although our tests are job-related, the Department of Employee Relations has no study materials.

Ensure that you know how to get to the test site, have adequate transportation (correct fare for the bus or money for parking if you're driving), and arrive early at the test site. Check to see what you must bring/may bring to the testing session. Please bring a form of picture identification in order to be admitted to the test.

As long as it will not be a distraction, bring a watch to keep track of the time. Also, if you have a question before or during a test, ask the monitor (the person in charge of the test). Asking another examinee might be interpreted as cheating. Persons who receive unauthorized help will be disqualified. Monitors are not allowed to give the meaning of test questions or words.

TAKING A WRITTEN TEST

WRITTEN TEST READING REQUIREMENTS

The written tests administered by the City of Milwaukee are from a type known as "job knowledge tests." For example, you might be required to read and answer questions about written passages that are taken from materials that you would come across on the job. By basing the test on job knowledge and job materials, the reading level of the test matches that required on the job.

There are typically three different types of questions used on City tests:

Multiple Choice

Multiple choice test items are usually comprised of a short phrase or question, called a stem, followed by 3-5 choices (words, phrases, numbers, etc.) which might complete the stem. Only one of the choices is correct for a particular question: the "best" answer. We stress "particular question" because a given choice may be incorrect for one question, yet the best answer for another. The other choices, which are incorrect for a particular question, are called distracters.

Related test question types are matching (a list of stems is matched with a list of choices) and true/false. Since these types of questions are similar to multiple choice, they will not be treated separately.

Good strategies include READING ALL THE CHOICES, even if you think you know the correct answer – sometimes the question is looking for the "most correct" answer. Similarly, do not eliminate a choice because you are unfamiliar with the wording. One of the best tips we can give you is that...

If you do not know the answer to a question on a multiple choice test, try to eliminate as many of the distracters as you can, as this will increase your chances of getting the correct answer.

Some examinees benefit by looking over the entire test and completing the easiest questions first. In this way, they may be able to avoid wasting time on a more difficult question that has the same point value as an easier one. However, skipping around may encourage clerical errors, frustration if several questions remain after an initial run-through, etc. Regardless, it is important to manage your time, to keep progressing and to maintain a positive attitude.

Do not "read into" the questions. Each question and choice for answer must be evaluated on its own

merit: the correct choice is the one that is most workable for the situation described. Analyze questions as if you were the employee. Even if two answers seem the same to you, **MARK ONLY ONE CHOICE ON YOUR ANSWER SHEET**; otherwise, you will not receive any credit for the question. **Erase completely if you change an answer**: do not cross out answers.

Finally, **DO NOT LEAVE ANY QUESTIONS BLANK--GUESS IF YOU MUST**, but only after making an honest attempt to answer the question. The vast majority of our tests is not speeded, and thereby has no penalty for guessing.

Completion/Short Answer Questions and Essay Questions

When you are required to provide short answers or write an essay on your test, read each question carefully to make sure you are interpreting it correctly. If you were required to read a longer section, it sometimes helps to refer back to the section for specific information relating to the question.

Be sure to take special notice of questions that have negatives or qualifiers in them such as "One step not found in this procedure is to..." or, "The statistics used most often for this purpose are..." When a question has more than one part, be sure to answer ALL of the parts. For example, you might be asked to "identify the problem..." and then to "suggest two ways to solve it." Present solid information and supporting facts for any of your conclusions.

You are not expected to write answers worthy of a Pulitzer Prize, but answers full of incomplete ideas, spelling errors, etc., will not be scored as highly. Some people find it helpful to think about longer answers before beginning to write. Also, it may be helpful to outline or jot down notes about your response before beginning to write the essay/answer itself. Experts maintain that the best way to prepare for an essay test is to write essays. Also remember that longer answers are not necessarily better answers--there will often be a limit on how much you can write (e.g., one side of a page). Do not write up until the time limit: **SET ASIDE TIME TO PROOFREAD YOUR ANSWER.**

TEST WISENESS

"Test Wiseness" refers to the idea that by taking many types of tests over time and/or receiving training on how to take tests, some people can answer questions correctly on a test (typically, multiple choice tests), by using information other than knowing the correct answer. Being test-wise may improve your chances of identifying a correct choice and aid in guessing. Note that **the Department of Employee Relations designs tests to measure job ability, not test-taking ability**. However, we have provided you with hints that will help for answering questions you may be struggling with to find answers.

The Department of Employee Relations makes no guarantees about the following clues/hints. These clues/hints come from several sources, and probably work best with classroom tests developed by less-than-careful teachers. Test-wise clues/hints, in no particular order, include:

- Look at the relationship between the stem and choices--sometimes, distracters don't "match" the stem grammatically, or have no relationship to the stem.
- There may be words that mean the same in the stem and a choice--this may be the correct answer.

- Choices which have these words in them are often wrong (i.e., are distracters): always, never, no, none, all, every, merely, solely, impossible, necessarily, only and must.
- Choices that have these words in them are often correct answers: generally, may, often, perhaps, seldom, usually, most likely, probably.
- If two answer choices are the same, you might assume that they are both wrong and eliminate them.
- If two choices are opposites, one of them is probably the correct answer.
- Look for choices that are longer/more precise in meaning.
- Sometimes one item "gives away" the answer to another that comes later in the test.
- If the answer choices include a series of numbers, dates, lengths, sizes, etc., choose the middle value.
- If you have no idea about the correct answer for a number of questions, or are about to run out of time and have a number of blanks, consider picking one choice (A or B or C, etc.) and marking all of the remainder of the test using this one choice.

It is important that you understand that we provided the test-wiseness hints/clues above because several people already know them. WE MAKE NO GUARANTEES THAT THEY WILL WORK, especially on City tests. We DO recommend that you:

1. Listen to/read directions and follow them carefully.
2. Read ALL of the questions and answer each question on its own merit.
3. Budget your time.
4. Guess if you must: answer all questions unless wrong answers are penalized.
5. Check your answer sheet often to avoid clerical errors.
6. Do not write in the test booklet unless told to do so.
7. Allow time to check your answers for correctness and completeness one last time at the end of the session.

Few people correctly answer all of the questions in our tests, so do not get upset if you do not know some of the answers or if others finish before you. Budgeting your time well will allow you to work at your best pace.

A NOTE ON MATHEMATICS QUESTIONS

The math problems that appear on City tests reflect the mathematics required to perform the job. In the vast majority of cases, the applicant should have the ability to add, subtract, multiply and divide whole numbers, fractions and decimals. Most often the mathematics questions are written to reflect job situations, such as having carpenters determine the correct length of a board that must be cut.

There are certain jobs where higher-level mathematics such as calculus or statistics may be tested, but these additional requirements will be listed on the job announcement. Often, more advanced mathematics knowledge is tested in the Training and Experience Ratings mentioned earlier. The Exam Date Letter will indicate if you may use/must bring a calculator.

The best way to prepare for mathematics questions is to practice doing mathematics problems, much like the drills in elementary education. Converting fractions to decimals and vice versa seems to be a problem area for several examinees, so take care to learn these skills. Additionally, it helps to:

- Learn how to interpret tables, graphs, charts, maps, etc. if they are used on the job for which you are applying.
- Draw diagrams, graphs, etc. on scratch paper to help yourself determine the answer to questions.
- Keep track of the position of numbers--many mistakes occur by marking the correct number in the wrong place.
- Use the units of measurement consistently--you can derive the correct numbers, but still make errors by not paying attention to whether you are dealing with inches, ounces, minutes, etc.
- CHECK YOUR WORK!

If you are pressed for time, you may consider estimating an answer. For example, $209 \times 392 = ?$ may take too long to multiply, but 209×392 is:

- ROUGHLY the same as 200×400 which equals 80,000, AND
- You know that $2 \times 9 = 18$, (The last two digits, multiplied), SO
- The correct answer is around 80,018+

So, check to see if there is an answer close to that (the actual answer is 81,928). Finally, even if you are permitted to use a calculator on your particular test, it is good practice to check your work because it is easy to press the wrong button on the calculator's keypad.

TAKING PERFORMANCE TESTS

While written tests measure your knowledge of a job, performance tests are used to measure a person's ability or skill to perform a job. Examples of performance tests are typing/word processing tests for clerical jobs and building/woodworking tests for carpenters. You should carefully consider your physical condition before you participate in a performance test. Remember that reasonable accommodations requested by qualified individuals with disabilities will be made in accordance with the Americans with Disabilities Act (ADA) of 1990.

In performance tests, the required skill or ability demonstrated in a realistic setting, using the actual techniques, materials, equipment and personnel involved in the job. A performance test closely resembles parts of the job itself.

Job incumbents, supervisors and other subject-matter experts develop tests. Performance tests are no exception. Subject matter experts help decide the content, administration guidelines, time limits and so on. They often observe and "grade" the performance of the applicant. In a performance test, you may be judged not only by the end product of your work, but also by the way in which you go about doing your work. You will be informed of the test location, time, required materials, etc. Most often, the performance test is administered a few weeks after the written test.

Be sure to dress appropriately for the performance test. In the exam date letter, you will be told if you are required to wear a certain type of clothing, shoes, gloves, etc. to the performance test.

The best way to prepare for a performance test is to prepare for the job. Some skills, such as typing, may be improved with daily practice on a typewriter or computer. Others, such as turning stock on a lathe may need more time to improve, as well as some rather expensive equipment. As with written tests, some performance tests take a number of hours to complete, so allow enough time in your daily schedule to finish the entire test.

TAKING ORAL TESTS

Oral tests are administered when the job requirements indicate that certain communications and interpersonal skills are particularly important for successful performance. These skills are often as important as specific technical knowledge and are commonly evaluated by measures other than written tests. The kind of oral test used most often is the "oral board." In this test, a person is "interviewed" before a panel of special examiners who are authorities in their field, and often not employed by the department in which the job opening occurs.

However, an oral test is more than a job interview. There is more structure in that all candidates are asked the same questions in the same order, answers/rating scales are provided in advance and ratings are made independently by a panel of raters and combined later. You will receive a grade in the oral test just as you would in a written test. Oral tests are usually recorded simply to keep a record of the examination.

Preparing for an Oral Test

Following are a few tips on preparing for and completing oral tests. Your goal is to be **prepared** for the test and to present yourself in a **positive manner**.

- ***Find out about the job.*** Read the job announcement carefully. You might also consider going to the public library to use references such as The Dictionary of Occupational Titles or The Occupational Outlook Handbook.
- ***Know your qualifications.*** The oral board members will be asking you some questions about former jobs and experiences. What skills, experience, training or talents help qualify you for this job? Which of the job duties listed on the announcement have you performed on previous jobs? Which personal attributes make you interested in or qualified to do this job? It's a good idea to write these types of things down as you think of them so that you can review this information.
- ***Anticipate questions related to the job that might be asked.*** Types of questions include knowledge of the job, solving problems, organizational (How would you do this?), pressure-handling (If this accident/error occurred, what you would do?), and situational (You are the supervisor and an employee refuses to complete an assignment...).
- ***Dress neatly and appropriately.*** You do not get a second chance to make a good first impression--you do not want to distract the board with your appearance.
- ***Arrive for the test early/on time.***

While you are waiting to be called to the oral exam room, try to relax. If you have extra time, take a few deep breaths, review your "short list" of notes, etc.

During the Oral Test

The examiners want to know your good points and how you are qualified for the job. The chances are that they probably don't know much about you and have only briefly seen your application. Therefore, it is imperative that you answer all of their questions completely.

- **Sell yourself.** Concentrate on the positive things you have to offer, not the negative. Avoid the common mistake of saying negative things about former jobs, co-workers, supervisors, etc.
- **Listen carefully to the questions and think before answering.** Do not feel that you must start talking immediately after the question to fill the silence. Among other things, the interviewers are judging if you can present a point of view and defend it, so they appreciate a well-conceived answer.
- **Answer each question completely and clearly.** The board is limited to asking a certain set of questions, so it is up to you to give them all the information they need to see if you are qualified for the job. Your ability to communicate is a major factor in oral tests--if the board cannot hear or understand you, your co-workers probably will not either.
- **Be complete and clear, BUT NOT LONG-WINDED.** A long, wordy answer is not better than a short, complete and concise answer. Explain any technical jargon you might use. Let the board lead the discussion.
- **Ask questions when appropriate.** Such as when you do not understand a question or need clarification of a statement. The interviewers usually take turns asking questions, so be prepared for different voices, inflections, etc.
- **Be alert, cheerful and interested in the interview and job.** Avoid questions on benefits, vacations, etc. which will be explained to you at a later time.
- **Maintain good eye contact.** If you are uncomfortable about looking people in the eye, try focusing on the interviewer's nose or forehead.

After the Oral Test

The board will let you know when the test is over. You may still have the chance to aid your cause, especially if they ask if you have any final questions or comments.

- Indicate your interest in the position again. This is your golden opportunity to recap your qualifications, indicate your interest in the job, and add important information that may have been missed earlier.
- Thank the board when finished. They have volunteered their time to help with the evaluation of candidates. Let them know that you appreciate their efforts.

AFTER ALL OF THE TESTS

After you have completed all of the tests, you will be notified by mail as to how you did on the examination. You will receive your test score at this time: a passing score on most civil service examinations is a grade of 70 or higher. The names of applicants who pass are placed on an eligible list, which lists the applicants based on the order of their scores, from highest to lowest. If the job for which you are applying required more than one test component (e.g., written and performance), you must pass all components separately and receive an overall combined grade of 70 or more.

NOTE: If an applicant successfully completes the process just described, the applicant's name will be placed on an eligible list. Unfortunately, there is no guarantee that you will be selected because there will be a number of people eligible to be hired for any given vacancy.

GOOD LUCK IN YOUR JOB SEARCH!

**Department of Employee Relations
200 E. Wells Street, Room 706
Milwaukee, WI 53202-3554**

General Office: 414-286-3751

TDD: 414-286-2960

Job Information Hotline: 414-286-5555

E-Mail: staffinginfo@milwaukee.gov

Web site: www.milwaukee.gov/jobs

Appendix

G

AMENDMENT NO. 3 to Contract No. E0000012849 dated 10/30/2013 between the CITY OF MILWAUKEE

and EB JACOBS LLC, a PSI BUSINESS
(CONTRACTOR)

THE AGREEMENT, identified in the above caption by number is hereby amended, modified, altered and changed in the following respects only:

1. INCREASE THE ESTIMATED CONTRACT TOTAL BY [REDACTED] FROM [REDACTED] TO [REDACTED]
2. EXTEND THE CONTRACT TERM BY THREE (3) YEARS FROM 12/20/2019 THROUGH 12/19/2022, EXERCISING THE OPTION TO EXTEND UPON MUTUAL CONSENT.
3. INCORPORATE NAME CHANGE FROM EB JACOBS LLC, a PSI BUSINESS TO PSI SERVICES LLC.
4. IMPLEMENT A CONTRACT NUMBER CHANGE FROM E0000012849 TO E0000012849-A.
5. ALL OTHER TERMS AND CONDITONS OF THE ORIGINAL CONTRACT AND AMENDMENTS ONE (1) AND TWO (2) REMAIN UNCHANGED.

This Amendment is made in consideration of the payments, performances, promises, and covenants and obligations which are set forth in the original Agreement and as set forth herein.

This Amendment shall in no way act as a waiver of the price, terms, and conditions, not herein amended, imposed on the parties by the original Agreement heretofore executed by them and identified in the above caption. Any rights or obligations which either of the parties has by virtue of the original Agreement shall remain in full force and effect except as is expressly and specifically amended, modified, altered or changed herein.

This agreement constitutes the entire agreement between the parties relating to the subject matter of this Amendment. All prior understandings, agreements, correspondence and discussions of the parties are merged into and made a part of this agreement.

IN WITNESS WHEREOF, this Agreement was executed by the undersigned officers as of the dates hereinafter specified for and on behalf of the parties hereto.

THE PROVISIONS OF THIS AMENDMENT HAVE BEEN REVIEWED AND APPROVED BY THE OFFICE OF THE CITY ATTORNEY.

City of Milwaukee

Contractor

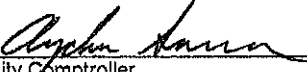
(Must be signed by persons authorized to legally bind your firm to this contract)



City Purchasing Director

2/25/2020
Date

Rhonda U. Kelsey
Printed Name



City Comptroller

2/27/2020
Date

Martin Matson
Printed Name

Firm: _____
 Address: _____
 City, State, Zip: _____
 E-mail: _____
 Signature: _____
 Title: _____
 Date: _____
 Printed Name: _____
 Signature: _____
 Title: _____
 Date: _____
 Printed Name: _____
 Witness Signature: _____
 Witness Signature: _____



Appendix

H

2019-2020 Milwaukee Police - DETECTIVE Timeline

ACTIVITY	DATE	Comments
Job Analysis	Early June 2018	All three positions completed in June 2018
Reading List DRAFT to FPC for Review	July 3, 2019	
Announcement/Reading List	Post September 20, 2019	Candidates must have the reading list 60 days prior to the test.
Candidate Preparation Guide for Written	Post November 21, 2019	Candidates must have the guide 60 days prior to the test.
Written Test	January 22, 2020	-PSI will be on-site
Candidate Preparation Guide for Oral Board Exam and CRB	By January 31, 2020	
Data and Appeals Received from FPC	10 days after Written Test (Feb. 1)	
Appeal Packet sent to FPC for Review	14 days after Appeals received (Feb. 17)	(FPC will review PSI's recommendations)
Determine number of assessors/panels needed to begin assessor recruiting. If there are NO cuts, use the total # of candidates who took the Written Test.	ASAP after Written Test Administration	All candidates who took Written Test in 2015 were invited to the OB/CRB Exam, but the numbers are much higher this time (150 vs. 250)
Appeals Resolved	5 days after Appeal Packet sent to FPC (Feb. 24)	(FPC makes final disposition)
Send Oral Board/Career Review Board Detailed Logistics Information to FPC	February 25	
SME Review of Oral Board/CRB	February 26	FPC reviews exercises
Candidates provide 3 copies of FACT SHEET to FPC	Three weeks prior to assessment center - February 28	
Assessor Training	March 22	FPC will secure testing facilities/hotel, PSI will recruit assessors and remain on-site
Oral Board Exam and Career Review Board Administration	March 23-27	
Final Eligibility List	2 weeks after data received (April 14)	FPC to receive list on or before April 14, 2020
Candidate Feedback and Score Reports	April 28, 2020	

2019-2020 Milwaukee Fire - FIRE CADET Timeline

ACTIVITY	DATE	Comments
Job Announcement	Post September 20, 2019	Post end date December 2, 2019
Written Prep Sessions	Jan. 18, Jan. 22, Jan. 25, Jan. 29, Feb. 1, Feb. 5, Feb. 8, Feb. 12, Feb. 22	Hosted by Fire: Community Outreach Firehouse
Milwaukee National Firefighter Selection Inventory (NFSI) standard study guide	Posted February 13, 2020	Guide provided 34 days prior to written exam.
Written Exam	March 18, 2020 (South Side- Casimir Pulaski HS) March 21, 2020 (North Side – Safety Academy)	IO Solutions provided materials – will not be on site (delivered Jan. 23)
PHQ Distribution	March 18 th and March 21 st	Given after the Written Exam. Due Date: April 21, 2020 (30 days)
Oral Interview Prep Sessions		Hosted by Fire
Oral Board Interview		
Physical Abilities Test (PAT) Practice Sessions		Hosted by Fire
Physical Abilities Test (PAT)		
MMPI-2 (Written)		
Pre-employment (psych & medical evaluations)		
Background appeal hearings		
Assess all preference points		
Presentation of eligible list to the Board of Commissioners	July 9, 2020	
Drug Test		
Fire Cadet Fit Camps		Hosted by Fire
Orientation		Hosted by Fire at Safety Academy
Fire Cadet Class Starts	August 10, 2020	Class No. ~35

2019-2020 Milwaukee Fire - FIRE FIGHTER Timeline

ACTIVITY	DATE	Comments
Eligible List Adopted	June 21, 2018	Expires May 3, 2020
MFD has to request an extension of the list	Notified January 14, 2020	Request has to be heard and approved prior to May 3, 2020
Review candidate status	Completed 1/30 April & Tammy	MMPI / Medical / CPAT
Send survey to candidates	Completed 2019	
Background completion	Week of February 17 – Absolutely have to have by February 19, 2020	Received Feb. 19th
Background Review Committee (BRC)	February 24 - 25, 2020	
Drug Test	February 24 - 25, 2020	
Send out appeal notices (5 days to appeal)	Send February 26, 2020	Returned by March 3, 2020
Appeal Hearings	Week of March 6, 2020	
MFD Letters to Commissioners	March 5, 2020	
Firefighter Class	March 16, 2020	PP 6, 2020

2019-2020 Milwaukee POLICE OFFICER Timeline

ACTIVITY	DATE	Comments
PHQ (30-day window to complete)		
Written Exam (2-3 weeks for results)	Completed	
Notify Pass or Fail written exam		
Oral Boards (1-day testing; 1-day scoring)		
PRT (can take own have 7 days to do so)	Dec. 5 – Dec. 6, 2019	
Pre-Employment Screening		
MMPI written	January 24, 2020	
@ checkout receive psych & medical appointments		Appointments scheduled 1/28 – 2/17
Backgrounds Meet with investigators (can happen anytime during process)	Final ARC February 4, 2020	Rest complete
5-day appeal window from when they are notified of background fail	February 9, 2020	
Background Appeal	February 21, 2020	16 Appeals
Review and add preference points		To be completed as soon as possible
FPC Board reviews eligibility list for approval	March 5, 2020	
Class Starts	March 9, 2020	

2019-2020 Milwaukee 50 POLICE OFFICER Catch-Up Timeline

ACTIVITY	DATE	Comments
PHQ (30-day window to complete)	January 23, 2020	Review and change dates
Written Exam (2-3 weeks for results)	Completed	
Notify Pass or Fail written exam		2 path
Oral Boards (1-day testing; 1-day scoring)	February 10 & 11 50 invited, 41 responded, 9 no shows, 32 actual participants, 11 WSE Fails	Prep room where they all gather Divide into 2 groups Send Group one on path 1 Send Group two on path 2
PRT (can take own have 7 days to do so)	February 21 21 remaining, 1 additional from leave	Pettit Ice Center
PHQ Due	February 24	MPD will be receiving PHQs to complete backgrounds as they are received.
Oral results back	February 21	
Add preference points	February 24	
MMPI written	March 6	Only for those who have successfully completed backgrounds
@ checkout receive psych & medical appointments	March 9 and 10	
5-day appeal window from when they are notified of background fail		
FPC Board reviews eligibility list for approval	March 5	
Class starts	March 9	

Appendix

I

AMENDMENT NO. 15 to Contract No. B0000009127-1 dated 10/29/2010 between the CITY OF MILWAUKEE
and OCCUPATIONAL HEALTH CENTERS OF THE SW PA
(CONTRACTOR)

THE AGREEMENT, identified in the above caption by number is hereby amended, modified, altered and changed in the following respects only:

8

1. EXTEND THE CONTRACT TERM FOR EIGHT (8) MONTHS FROM 07/01/2019 THROUGH 03/31/2020, TO BE USED ON AN AS NEEDED BASIS FOR PERSONNEL THAT ARE GOVERNED BY THE POLICIES AND RULES OF THE BOARD OF FIRE & POLICE COMMISSIONERS THROUGH MARCH 31, 2020, AND PERSONNEL GOVERNED BY THE RULES OF THE BOARD OF CIVIL SERVICE COMMISSIONERS UNTIL AUGUST 31, 2019.
2. ALL OTHER TERMS AND CONDITIONS OF THE ORIGINAL CONTRACT AND AMENDMENTS ONE (1) THROUGH FOURTEEN (14) REMAIN UNCHANGED.

This Amendment is made in consideration of the payments, performances, promises, and covenants and obligations which are set forth in the original Agreement and as set forth herein.

This Amendment shall in no way act as a waiver of the price, terms, and conditions, not herein amended, imposed on the parties by the original Agreement heretofore executed by them and identified in the above caption. Any rights or obligations which either of the parties has by virtue of the original Agreement shall remain in full force and effect except as is expressly and specifically amended, modified, altered or changed herein.


This agreement constitutes the entire agreement between the parties relating to the subject matter of this Amendment. All prior understandings, agreements, correspondence and discussions of the parties are merged into and made a part of this agreement.

IN WITNESS WHEREOF, this Agreement was executed by the undersigned officers as of the dates hereinafter specified for and on behalf of the parties hereto.

THE PROVISIONS OF THIS AMENDMENT HAVE BEEN REVIEWED AND APPROVED BY THE OFFICE OF THE CITY ATTORNEY.

City of Milwaukee

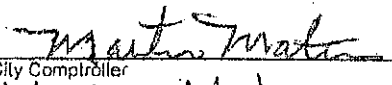
Contractor
(Must be signed by persons authorized to legally bind your firm to this contract)



City Purchasing Director


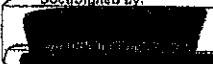


9-20-2019
Date

Rhonda U. Kelsey
Printed Name



City Comptroller
Martin Matson
Printed Name

9/23/19
Date

Firm: OCCUPATIONAL HEALTH CENTERS OF THE SW PA
 Address: 5080 SPECTRUM DRIVE, SUITE 1200 WEST
 City, State, Zip: ADDISON, TX 75001
 E-mail: _____
 Signature: 
 Title: _____
 Date: _____
 Printed Name: _____
 Signature: _____
 Title: _____
 Date: _____
 Printed Name: _____
 DocuSigned by: 
 Witness Signature: 
 Witness Signature: 

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Appendix

J

2019-2020 Milwaukee Police DETECTIVE Timeline

ACTIVITY	DATE	Comments
Job Analysis	Early June 2018	All three positions completed in June 2018
Reading List DRAFT to FPC for Review	July 3, 2019	
Announcement/Reading List	Post September 20, 2019	Candidates must have the reading list 60 days prior to the test.
Candidate Preparation Guide for Written	Post November 21, 2019	Candidates must have the guide 60 days prior to the test.
Written Test	January 22, 2020	PSI will be on-site
Candidate Preparation Guide for Oral Board Exam and CRB	By January 31, 2020	
Data and Appeals Received from FPC	10 days after Written Test (Feb. 1)	
Appeal Packet sent to FPC for Review	14 days after Appeals received (Feb. 17)	(FPC will review PSI's recommendations)
Determine number of assessors/panels needed to begin assessor recruiting. If there are NO cuts, use the total # of candidates who took the Written Test.	ASAP after Written Test Administration	All candidates who took Written Test in 2015 were invited to the OB/CRB Exam, but the numbers are much higher this time (150 vs. 250)
Appeals Resolved	5 days after Appeal Packet sent to FPC (Feb. 24)	(FPC makes final disposition)
Send Oral Board/Career Review Board Detailed Logistics Information to FPC	February 25	
SME Review of Oral Board/CRB	February 26	FPC reviews exercises
Candidates provide 3 copies of FACT SHEET to FPC	Three weeks prior to assessment center - February 28	
Assessor Training	March 22	MPD will secure testing facilities/hotel, PSI will recruit assessors and remain on-site
Oral Board Exam and Career Review Board Administration	March 23-27	
Final Eligibility List	2 weeks after data received (April 14)	FPC to receive list on or before April 14, 2020
Candidate Feedback and Score Reports	April 28, 2020	

Appendix

K

FPC Community Partners List

Below is an updated list (as of March 30th, 2020) of community partners the FPC is currently engaged with and has engaged with in the past.

Organization	Type of Org	Focus	Partnership History
All 4 Kids	Non-profit	Youth Programming	Partner in Reckless Driving Summit Planning Committee
Bader Philanthropies	Private	Philanthropy	Space to hold community sessions, share marketing materials
Boys & Girls Club of Milwaukee	Non-profit	Youth Programming	Previously partnered with FPC, discussed holding community sessions there in the future
Gerard L. Ignace Indian Health Center	Non-profit	Healthcare	Hosted FPC Recruiting Roundtable
Greater Milwaukee Foundation	Private	Philanthropy	Space to hold community sessions, share marketing materials
Journey House	Non-profit	Community Center	Space to hold community sessions, share marketing materials
MA'RUF Center	Non-profit	Youth Programming	Partner in Reckless Driving Summit Planning Committee, space to hold community session
Milwaukee Police Department	Government	Protective Services	Partner in Reckless Driving Summit Planning Committee
Milwaukee Public Libraries	Government	Education/Learning	Space to hold community hours for complaints, house complaint brochures
Office of Violence Prevention	Government	Violence Prevention	Co-Chair in planning of Reckless Driving Summit
Running Rebels	Non-profit	Youth Programming	Partner in Reckless Driving Summit Planning Committee
S.M.I.L.E., Inc.	Non-profit	Social Services	Partner in Reckless Driving Summit Planning Committee
Safe & Sound	Non-profit	Youth Programming	Partner in Reckless Driving Summit Planning Committee
Silver Spring Neighborhood Center	Non-profit	Community Center	Space to hold community sessions, share marketing materials
UMOS, Inc.	Non-profit	Community Center	Hosted FPC community listening session
United Community Center	Non-profit	Community Center	Space to hold community sessions, share marketing materials
Unity Gospel House of Prayer	Faith	Ministry	Hosted FPC community listening session
YMCA	Non-profit	Community Center	Previously partnered with FPC
YWCA	Non-profit	Eliminating racism and empowering women	Discussed holding community sessions at location, having YMCA staff moderate sessions focused on race & policing
Zeidler Group	Non-profit	Public Discussion	Previously partnered on the Reckless Driving Summit, possible partner for next summit

Appendix

L



Official Website of the City of Milwaukee

CALL for Action (414) 286-CITY | Click for Action

Directory

Residents

Business

Visitors

Milwaukee Police Department

About MPD

District Web Pages

Information & Services

Police Districts

Police Units & Partners

Contact MPD

Citizen Complaints

The following information is provided to you by the Milwaukee Police Department to inform you of the citizen complaint process.

Citizens, who wish to express dissatisfaction with members or policies of this department, should adhere to the following guidelines to ensure that a complete and proper investigation is conducted. As a citizen, if you believe you have been mistreated or have not received adequate service, you have a moral and legal right to express dissatisfaction with your police department. This will not only make you a responsible citizen, but your input will help to improve the department. If you believe a member of this Department has acted improperly or has violated a Department Code of Conduct, a federal or state law, or an ordinance of the City of Milwaukee, you may file a written complaint. However, false complaints will be reviewed by the District Attorney's Office. No member of the Milwaukee Police Department will attempt to interfere or influence your right to complain about the service this department provides to you. Your complaint will be thoroughly and impartially investigated.

Because of the responsibilities imposed on all parties involved in the Citizen Complaint Process, the Milwaukee Police Department must inform you that Wisconsin State Statute, §46.66(2), False Complaints of Police Misconduct, states in part: "Whoever, knowingly makes a false complaint regarding the conduct of a law enforcement officer is subject to a Class A forfeiture."

INSTRUCTIONS FOR FILING YOUR COMPLAINT

What is a complaint?

A complaint is a belief that a member of the Milwaukee Police Department has violated a Department Code of Conduct, a federal or state law, an ordinance of the City of Milwaukee, or dissatisfaction with a policy or procedure of the Milwaukee Police Department.

Who can file a complaint?

In most cases, a complaint can be filed by any citizen or agent representing an aggrieved or injured party. However, the agent shall be limited to an attorney representing the aggrieved citizen; the parent or guardian of a minor child; or a translator representing a non-English speaking complainant. Agents can obtain a Citizen Complaint Form for the aggrieved or injured party and assist with its completion. A citizen complaint can be filed at any police district, bureau, or division. All complaint reports are confidential.

You may file your complaint:

Using our online complaint submission form

By email at MPDIAD@milwaukee.gov

By going to a district station;

By calling the department and asking for a supervisor to meet with you;

By calling the Internal Affairs Division at 414-935-7942;

With the Milwaukee Fire and Police Commission; or

By downloading the Citizen Complaint Form, which is available in English, Hmong, and Spanish. You may return the completed Citizen Complaint Form to any Milwaukee Police Department district station or mail it to the following address:

Milwaukee Police Department
Internal Affairs Division
6680 North Teutonia Avenue Room 325
Milwaukee, Wisconsin 53209

When you file your complaint, please provide the following information to the supervisory officer (or investigator) writing your complaint or on the complaint form you are filing yourself:

Your personal information (full name, date of birth, address, phone number)

The date and time of the incident

The nature of the incident

All parties involved, witnesses, records, photographs and other evidence

What must be filed?

In most cases, when a complaint is filed, a narrative of the complaint will be written by a supervisory officer on the Citizen Complaint Form. The citizen or agent will sign the Citizen Complaint Form and a copy will be provided. However, if more convenient for the citizen, the Citizen Complaint Form can be completed at a later time, and returned to the Milwaukee Police Department. If the Citizen Complaint Form is returned by mail, it should be sent to the following address:

Milwaukee Police Department
Internal Affairs Division
6680 North Teutonia Avenue Room 325
Milwaukee, Wisconsin 53209

WHAT HAPPENS WITH YOUR COMPLAINT

The Investigation

The Department will conduct a thorough investigation to include interviews of all available witnesses.

Who Will Investigate

Supervisors and/or detectives, under the direction of the Internal Affairs Division, will conduct all complaint investigations. Their duty is to gather all the facts and present these facts for review.

Length of Investigation

Most investigations will be completed within a timely manner. Complex investigations may take several months to complete.

THE FINAL DISPOSITION OF COMPLAINT

The Completed Investigation

Once the initial complaint has been thoroughly investigated and all of the facts have been gathered, the completed investigation will be reviewed. This review will determine if there was compliance with the department Code of Conduct, federal or state laws, ordinances of the city of Milwaukee, or the policies and procedures of the Milwaukee Police Department.

Decision of the Chief of Police

If the Chief of Police determines there is a violation of department Code of Conduct, federal or state laws, ordinances of the city of Milwaukee, or policies and procedures of the Milwaukee Police Department, criminal charges will be sought, disciplinary action, and/or a change of policy may result.

Notification

When the final disposition has been made, a notification letter will be sent informing the complaining party of the outcome of the investigation.

Complaint Review

Citizens have the option of having their complaints reviewed by the Fire and Police Commission. For further information regarding this procedure, contact the Milwaukee Fire and Police Commission.

Fire and Police Commission
200 East Wells Street, Room 706,
Milwaukee, Wisconsin 53202
Phone Number 414-286-5000

The Milwaukee Police Department cannot make monetary awards or provide legal assistance. Information obtained during these investigations is considered confidential and will not be divulged except in accordance with State Statute (103.13) governing the release or inspection of personnel records.

For further information on the Citizen Complaint Process, please contact the Milwaukee Police Department Internal Affairs Division at 414-935-7942.



Milwaukee Police Department
Internal Affairs Division
6680 N. Teutonia Av. Room 325
(414) 935-7942

Mayor Tom Barrett
Common Council

Departments
Directions, Hours & Directory
Calendar

Residents
Business
Visitors

Web & Email Policies
Web Accessibility Policy & Information
Web Contact Us

Design by City of Milwaukee

Appendix

M



MODERN POLICING

The Maxey Group, LLC

- Critical incident after-action reviews
- Policy drafting and review
- Use of Force, Search and Seizure, and Internal Affairs review
- Training development and review
- Technology implementation and business processes
- Civilian oversight and engagement
- Privacy & transparency review

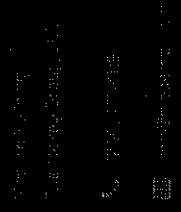
HOME ABOUT NEWS APPEARANCES CONTACT



The Maxey Group, LLC

Modern Policing draws upon industry experience in innovative policing and police reform, civil rights enforcement, social science, and organizational change to drive best practices. We have access to a cadre of national experts across all areas of policing and government practice and can assemble an effective, streamlined team to meet your needs. We pride ourselves on being direct and problem solvers, creating practical, real-world solutions, within budget and scope.

Contact



Appendix

N

DEPARTMENT OF EMPLOYEE RELATIONS

January 13, 2020

Separation Checklist

Employee Name:

Department/Division:

Separation Date:

Employee Job Title:

Immediate Supervisor Name:

VOLUNTARY SEPARATIONS - Resigning from Title only or from City Employment:

1. Ask employee to complete Resignation Form, obtain all signatures, distribute copies accordingly
2. Determine what property needs to be returned
3. Make contact with ITMD and the appropriate Department building security and prepare to remove access to system(s) and building(s)
4. Schedule meeting and conduct exit interview
5. Provide "Benefit Information for Employees Separating from City Service For Reasons OTHER than Retirement" to employee
6. After the separation, remove email access and building access, coordinate forwarding of calls and emails
7. Notify payroll and ensure payroll records are completed.

INVOLUNTARY SEPARATIONS

1. If the separation is a termination during probation, complete Termination notice and the Report of Probationary Service and notify the employee.
2. If the separation is a discharge, conduct pre-disciplinary meeting, analyze evidence, prepare discharge documentation and notify the employee.
3. Notification in person is preferred but mailing of the paperwork may be necessary in some cases. When mailing the paperwork, please send both certified mail and regular mail to the employee's home address.
4. Distribute copies accordingly.
5. Provide "Benefit Information for Employees Separating from City Service For Reasons OTHER than Retirement" to employee
6. Receive property, remove access, and set up forwarding as needed
7. Notify payroll and ensure payroll records are completed.

PROPERTY

Note: Property varies by department, division, and position. Not all positions have all property listed below. DER suggests that departments create specific checklist of property, including electronic access.

- ID Badge – should be deactivated and forwarded to employee’s Supervisor
- Contact Building Security immediately for deactivation of badge
- All security and IT access (all electronic logins specific to the position) should be immediately deactivated
- Pro Card should be taken
- Car Keys, Parking Card Access Badge, Gas Card
- Cell phone and/or pager
- Desk Keys/Office keys/File Cabinet Keys
- All Equipment & Tools/Protective Gear/Clothing
- Laptops/Cameras
- Notify ITMD to set up e-mail forwarding or permanent out of office message
- Set up phone forwarding and/or appropriate voicemail; change password on phone

Appendix

O

DEPARTMENT OF EMPLOYEE RELATIONS



December 26, 2019

Protecting Personal and Private Information Policy Department of Employee Relations

This policy defines and describes the expectations associated with the handling of personal and private information by all DER employees. It is the responsibility of every DER employee to respect and protect the confidentiality of information used in the performance of assigned responsibilities in accordance with applicable federal and state employment laws, including but not limited to Genetic Information Nondiscrimination Act (GINA), Americans with Disabilities Act (ADA), Health Insurance Portability and Accountability Act (HIPAA), Family and Medical Leave Act (FMLA), Workers Compensation, Wisconsin Privacy Laws and Wisconsin Public Records laws.

DER plays a key role in several city-wide functions that create the need access to personal and private information of all employees, applicants, and employee spouses and dependents. DER employees will unavoidably receive and handle personal and private information about employees and their immediate family. This policy establishes the requirements and expectations to be followed to ensure that all personal and private information is well protected.

Personal and Private Information includes the following categories of information as related to current and former employees, employee spouses and dependents, and applicants

1. Personal (social security number, address, date of birth, personal e-mail, personal home or cell phone number)
2. Hiring (employment application, interview notes and results, background checks, I-9 forms)
3. Performance (performance reviews, performance improvement plans, warnings and disciplinary notices, grievance and appeals, employee assessments, reports on probationary services)
4. Personnel files of DER employees
5. Employment files of all City employees
6. Compensation and benefits (salary or rate of pay information, benefit selection and status, unemployment insurance claims, long term disability claims, tuition reimbursement usage)
7. Payroll (pay stubs, direct deposit forms, tax forms)
8. Workers' compensation records
9. Medical, dental and drug utilization information, including drug test results/pre-placement medical evaluation results, FMLA medical certifications, and ADA requests for accommodations and related medical certifications or information
10. Information in computer systems, including all third party websites with personal and private

information, records, or data (i.e. third party administrators, claims management systems, regulatory administrative sites, human resource management system, financial management system)

11. Any other information that a reasonable person would consider private

All employees must adhere to the following standards:

I. Protecting Personal and Private Information

- A. Personal and private information must be stored in an appropriate secured format when not in use.
- B. Personal and private information must not be displayed or left unattended in a place where it can be easily viewed by others (e.g., printer, copier, desktop, or computer screens). Fax machines in common areas should be checked on a regular basis by a designated group of people for incoming faxes containing personal and private information. If a DER employee sees an incoming fax or other documents on the printer, that employee should hand deliver it to the person it was addressed to or leave it in the person's mailbox.
- C. Personal and private information should not be discussed in open areas where the confidentiality of the information cannot be assured. This includes using speaker phone in an open area.
- D. Upon separation from employment in DER, all departmental information must be returned securely to the custody of DER administration and copies must be deleted from any personal devices.
- E. Personal and private information should not be sought, accessed, reviewed, duplicated or distributed for purposes that are not related to a specific assignment. Employees must have a legitimate reason as it relates to associated job responsibilities to seek, access, duplicate and/or review personal and private information.
- F. Personal and private information should not be accessed for personal use no matter how well intentioned the use of information (i.e., looking up home addresses for sending a greeting card).
- G. When disposing of personal and private information in compliance with DER's record retention schedules, it must be destroyed under supervision. Personal and private information is not to be deposited into the trash or recycling bins.
- H. Personal and private information should only be viewed on secure devices that are in compliance with the technology security policies set forth by DOA-ITMD.
- I. When traveling with personal and private information outside of DER, employees must take all appropriate precautions to safeguard the information.

II. Sharing Personal and Private Information

- A. Personal and private information should be discussed with others in DER only on a need to know basis. Employees of DER may only share personal and private information with other DER employees as it relates to the assignment and associated job responsibilities. For example, labor relations does not need to know the details of a health insurance claim from

medical benefits.

- B. All requests for personal and private records of the employee from third parties or other departments shall be referred to the Human Resources Compliance Officer. The employee shall not make any personal and private records available to third parties or other departments without the express, written consent of the Human Resources Compliance Officer. This section does not apply to section II (C) – (F) of this policy, which govern the permissible sharing of personal and private information by the Employee Benefits Division.
- C. Worker's Compensation may share information with the Department in which the employee works on a need to know basis, such as 1) return to work information, including restrictions; 2) the notice of loss and accompanying documents; and/or 3) information related to a fact-finding investigation. If there is a legitimate business purpose related to an incident, claim, or potential litigation, and it is allowed by regulations, Worker's Compensation may also share personal and private information with EAP, DER Benefits, City Attorney's Office, ERS, and other outside entities.
- D. The Employee Assistance Program may share information with the Department in which the employee works on a need to know basis, as long as it is limited to the information allowed by a signed authorization consenting to the disclosure of certain information.
- E. The Employee Benefits Division (including Employee Assistance, Worker's Compensation, and Benefits) may share personal and private information with third-party vendors, the employee, and the employee representative with written permission as it pertains to specific benefits and claims administration and resolution. The Employee Benefits Division is responsible for administering the secured transmission of such personal and private information to third-party vendors.
- F. When personal and private information is provided to or received from third-party vendors, it must be transmitted in a secured manner, such as encryption, secure e-mail, password protected, or via a secured FTP site.

III. Public Records Requests

- A. Personal and private information may be disclosed as a result of a public records request and/or a personnel records request made by the employee or the employee's representative as long as an appropriate release has been received.
- B. Any public records or personnel record request must be forwarded to the Human Resources Compliance Officer for review and to ensure that documents are redacted to be in compliance with this Policy and to ensure that only records that are subject to disclosure under the public records law are provided to the request.
- C. Nothing in this policy shall prevent the disclosure of information that a requestor is entitled to by law.

IV. Reporting Disclosures of Personal and Private Information

- A. Employees are required to report violations of this Policy without regard to the relationship between the individual who initiates the prohibited behavior and the individual reporting it. An employee who believes that another employee may be in violation of this policy should report the alleged violation to the Human Resources Compliance Officer and/or the reporting employee's immediate supervisor or manager.

- B. Employees are required to self-disclose violations of this Policy. An employee who believes he/she may have disclosed personal and private information should report the incident to the Human Resources Compliance Officer and/or the reporting employee's immediate supervisor or manager.

V. Enforcement

- A. Deliberate efforts to disclose personal and private information or to access information not required by an employee's assignment and associated job responsibilities will be considered a violation of this Policy.
- B. Violation of this Policy is considered a serious offense. Any abuse, misuse, or dissemination of personal and private information will result in disciplinary action up to and including discharge from employment.
- C. No employee may retaliate against an employee who has reported a possible violation of this policy.
- D. All employees must sign the Pledge of Confidentiality. The signed Pledge is to be kept in the employees personnel file.
- E. Any questions on the confidentiality of a record or information should be directed to the Human Resources Compliance Officer.

**STATEMENT OF ACKNOWLEDGEMENT
PROTECTING PERSONAL AND PRIVATE INFORMATION POLICY**

I have read and understand the department's requirements and expectations as established in the DER Protecting Personal and Private Information Policy.

Dated: _____

Signed: _____

Name: _____

Employee ID Number: _____

Appendix

P

Mobile Device Management Policy

Purpose

Mobile devices are commonly being used in almost all departments to increase performance in the field and extend communications beyond the office. The City is committed to provide and promote this technology as appropriate to add value to the community by delivering high quality services at the lowest possible cost.

Scope

This Policy establishes the rules and conditions for City-supplied cell phones and privately-owned mobile devices being used to conduct City business. Mobile devices are defined as any electronic device with the ability to transmit or receive data, text, and/or voice, via a cellular network. This includes but is not limited to smartphones, cellular equipped tablets, laptops, and mobile hot-spots.

All City employees and contractors issued and accepting City mobile devices and services from the Information and Technology Management Division will be expected to maintain compliance with this policy. Public Safety (MPD & MFD) and the following elected officials' departments (City Clerk/Common Council, City Treasurer, City Comptroller and City Attorney) maintain their own vendor contracts and are therefore excluded from this policy. However, these department should review and consider including in their departmental work rules items #1-6 below or other pertinent items under 'General Policy'.

General Policy

1. Employees may use a City device for incidental personal use, however a City mobile device is intended for business use. Employees should be cautious about the merging of personal and work activities on their devices. See other policies that may apply such as Email Use Policy and the City of Milwaukee Internet Use guidelines.
2. If an employee elects to use his or her personal device for City business they should be aware that they could be required to share their usage in an open records request or in the event of litigation. The City does not offer per-call reimbursement or provide stipends for personal monthly cellular service or data usage.
3. Mobile devices that access email and other City services must be secured using a passwords or pin. Devices may not be "rooted" or "jailbroken" or have any software/firmware installed which is designed to gain access to functionality not intended to be exposed to the user.
4. Employees must not load pirated software or illegal content onto their devices. If you are unsure about any specific application, contact ITMD.

5. Any non-City of Milwaukee e-mail, instant messaging, social media, or other accounts must not be used to conduct City-related business. If an official record is received or generated using text-messaging or any other third-party service, the employee must save the record to City systems that are routinely backed up and archived to comply with open records laws.
6. In situations where job responsibilities include regular driving and acceptance of business calls, hands-free equipment may be provided to facilitate the provisions of this policy. Under no circumstances are employees required to place themselves at risk or break the law to fulfill business needs. Employees who are charged with traffic violations resulting from the use of their phone while driving will be responsible for all financial liabilities and associated penalties that result from such actions.
7. Department or division telecommunications coordinators will recommend who qualifies for a City issued cellular device based on department needs.
8. With proper authorization, a City employee may be issued multiple mobile devices with enabled cellular service. Employees needing to connect multiple devices to either the Internet or a cellular service provider should work with ITMD for alternative solutions and technologies. Such technologies may include smart phone tethering or a temporarily assigned Mi-Fi access point.
9. All City device service usage records produced by assigned mobile devices are property of the City and managed by the City. Usage summary reports (i.e. number of minutes or GB of data used) are distributed to department telecommunications coordinators regularly and are periodically reviewed by ITMD. Detailed usage reports, including call history, are available to any supervisor upon request by contacting ITMD.
10. Mobile device management software is used to enforce mobile device security requirements for ITMD-issued mobile devices and personal devices that access City resources. This software may include the ability to require passwords, limit installation of software, push security updates, locate the device, and remotely wipe (erase all data and reset to factory defaults) mobile devices. A wipe removes everything on the device. The City of Milwaukee is not responsible for any personal data on the device lost in this process.
11. Employees in possession of ITMD-issued mobile devices are expected to secure the equipment from loss or damage. If the cellular device is lost or damaged, the employee should report this to ITMD. ITMD will remotely reset the cell phone to factory defaults (remote wipe the device) and the device will be replaced with a device that is capable of performing similar City business as the original device. There is no guarantee that such a replacement device will be the same make or model device that was lost or damaged. Under circumstances where it is determined that the employee is responsible for damage to, or misuse of, their issued mobile device, disciplinary action may be taken.

12. Purchase of and billing for mobile devices and services will be coordinated by ITMD with the department or division telecommunications manager. Purchases without the knowledge and involvement of ITMD is not allowed for ITMD-supported departments.

Compliance

ITMD or the Department Telecommunications Coordinator will notify the Employee if there is a compliance concern, so the Employee may rectify any inadvertent breaches of policy expeditiously. Any continued or serious compliance concerns will be immediately referred to the Employee supervisor for potential disciplinary action.

City records are prohibited from being permanently stored on a mobile device. Only copies of documents may be stored on a mobile device for extended periods. City records (including documents, photos, videos, or any other City record) created on a mobile device are to be transferred by the user as soon as practical to City systems that are routinely backed up and archived.

City-issued mobile devices are City owned property. If the device is no longer needed for City business, it is to be returned to ITMD. Mobile devices deemed excess property are re-sold through the City's established excess property disposal procedures and methods. Departments or Divisions may not sell, trade-in, or give-away new or used City cellular or communication devices.

Upon resignation or termination of employment, employees are expected to promptly return the mobile device. Employees who separate from employment without returning City equipment or who incur charges after separation may be subject to legal action for recovery of the loss.

Individual departments may have additional restrictions, based on specific needs or policies of the department.

Enforcement

Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Appendix

Q

PURCHASES MADE WITHOUT A CONTRACT 2013 TO 3/31/2020

<u>Service</u>	<u>Vendor</u>	<u>Date Range</u>	<u>Year</u>
Batteries for FPC meeting timer	Batteries Plus		2016
Flash drives	B&H Photo Video		2016
Business cards	BCT	2013-2020	
Printed recruitment posters, flyers, brochures	Milwaukee Co. House of Correction		2017
Printed answer sheets from Scantron	Harland Technology Services		2014
Printed envelopes	BCT/Primus	2013, 2019	
Printed envelopes	Milwaukee House of Correction		2015
Printed PO PHQ Booklets	Digital Edge		2014
Printed annual & mid-year reports	Digital Edge		2013
Printed courtroom hearing signs	Digital Edge		2015
Printed job announcement bulletin paper	Digital Edge		2015
Online subscription	Jsonline	2013-2020	
Online subscription--Testing/Recruiting	TextCarrier.com	2017-2020	
Online subscription	Business Journal		2019
Postage	Dept. of Administration	2013-2019	
WI Statutes book	State Bar of Wisconsin		2013
Public Records/Open Meetings book suppl.	State Bar of Wisconsin	2015-2019	
Law book	Public Agency Training Council		2013
Weighted vests for FC PAT	Sports Authority & unknown vendor	2013, 17, 19	
Headsets for dispatcher exam	Amazon		2018
Padlocks for off-site testing cabinets	Unknown vendor, Lowes	2015-2018	
Photo lamination for recruitment stall display	Digital Edge		2013
Fines WI evidence book	Juris Publishing Inc	2013-2014	
Employment discrimination law book	State Bar of Wisconsin	2013, 2016-19	
Fan for vault ventilation	Home Depot?		2014
Heater for Clifton's office	Home Depot?		2018
Key duplicates for academy office, etc.	Whitlow Security	2014, 2019	
Document stands for ECO test	Unknown vendor		2016
Projector bulb replacement	B&H Photo Video		2018
DVD/CD duplicator	B&H Photo Video		2018
Digital recorder/batteries/charger	B&H Photo Video	2014, 2018	
Digital recorder transcription kit	B&H Photo Video		2014
Fax machine replacement	Unknown vendor		2016
Carry cases for laptops	Best Buy	2016-17, 2019	
Hand cart, hand trucks for recruiter, testing	Lowes		2016
Rolling file cart for FPC meetings	Hobby Lobby?		2017
Measuring wheel for PAT exam	Unknown vendor		2016
Tandem sport vertical challenger jump tester	Amazon		2016
Stopwatches	Accusplit		2017
Timer clocks	Amazon		2019
Tote bags for recruiter	Hobby Lobby/Joann Fabrics/Lands End	2014, 2018	
Chairs & foldable table for recruiter	Sam's Club		2016
Table skirt with FPC logo	Tentcraft		2020
Cooler box for FPC meeting beverages	Unknown vendor		2015
Television replacement & cable	Best Buy		2019
File cabinets for managers	Amazon		2019
Shredders for managers	Unknown vendor		2019
Refrigerator replacement (Room 605)	Best Buy		2019
FPC logo cups	Lands End		2015
FPC logo lapel pins	Hog Eye Inc.		2017
FPC logo shirts	Lands End	2018-2020	
Laminated signs	Digital Edge		2014
Archival boxes for old minutes books	Unknown vendor		2014
Picture frames	Unknown vendor		2016
Pocket badges for commissioners	Walter Curtis Co.	2016, 2018	
Wireless phone headsets for staff	T&R Personnel, Metroline	2015, 2017-18	
Scantron scanner annual maintenance fee	Harland Technology Services/Scantron Corp.	2016-2019	
Recruitment canopies (tent) & wheeled bags	Tentcraft	2015, 2017	
Color mobile duplex scanner	B&H Photo Video		2018
Job fair fee	Dane County	2013-2014	

Job fair fee	Fresh Coast Classic	2013-2017	
Job fair fee	Marquette University		2013
Job fair fee	MATC		2013
Job fair fee	South Sub. Chamber of Comm-MATC		2015
Job fair fee	UW-Milwaukee	2013, 15, 17	
Job fair fee	UW-Waukesha		2013
Job fair fee	Concordia University		2014
Job fair fee	Social Development Foundation		2014
Job fair fee	Lakefront Communications/WJMR	2014-17, 19-20	
Job fair fee	LULAC National Women's Conf.		2014
Job fair fee	Milwaukee Career Expo (DER paid half)		2017
Job fair fee	Mitchell Street Bid #4 Sun Fair		2017
Job fair fee	Garfield Avenue Blues Festival		2017
Job fair fee	Alverno College		2017
Job fair fee	United Negro College Fund	2018-2019	
Job fair fee	Latino Family Expo	2018-2019	
Job fair fee	WI Private Colleges Career Consortium		2018
Job fair fee	Puerto Rican Festival		2019
Job fair fee	Black Arts Fest MKE		2019
Recruitment event (practice written & info session)	Milwaukee Public Schools		2018
Exam venue rental fee	Wisconsin Center District	2014, 2017-19	
Exam venue rental fee	Milwaukee Public Schools	2013, 2015-19	
Exam venue rental fee	Serb Hall	2016, 2020	
Exam venue rental fee	Intercontinental Milwaukee Hotel		2017
Safety costs for exam rentals	Milwaukee Public Schools	2014-16, 19	
Police/youth listening circles & dialogue report	Ziedler Center for Public Discussion		2017
Sponsorship of LEN Entrepreneurial Boot Camp	Latino Entrepreneurial Network SE WI Inc.		2017
Sponsorship of table at Exito Awards	Latino Entrepreneurial Network SE WI Inc.		2018
Auto allowance for approved positions	City positions ordinance	2013-2019	
Parking costs for management employees	Imperial Parking (1000 N. Water St.)	2017-2020	
Audio/visual rental for appeal hearing	Studio Gear		2015
Chair rental for exams	Area Rental & Sales Co. & unknown	2015-16, 2018	
EMT exam vouchers for Firefighters	National Registry of EMTs	2013-2014	
Notary Public filing fee	WI Dept. of Financial Institutions	2014-15, 2018	
Notary Public bond renewal fee	Milwaukee Court Bond Agency	2014-15, 2018	
Ethics Instructor Certification course	Neal Trautman PhD Inc.		2015
Travel advance for ethics course	La'Neka Horton		2015
Deliveries to testing consultants	FedEx	2013-2020	
Delivery of mis-directed package to rightful owner	FedEx		2017
Delivery of meeting materials to Commissioners	Quicksilver Express Courier of WI		2019
Witness fee	Kerry Flowers		2016
Witness fees	State Process		2016
Witness fees	Von Briesen & Roper SC		2015
Process server delivery	SACCO Process & Inspections LLC		2014
Process server delivery	State Process Service	2016-17, 2019	
Fax machine maintenance	Blue & Koepsell		2016
Annual dues & conference registration	NACOLE	2013-2019	
APCO membership dues for DeHaan	APCO International	2017-2018	
Reimburse expenses for NACOLE attendee	Executive Director	2013, 2015	
Webinar registration	NACOLE		2019
WEMA annual membership	WI Emergency Management Association		2018
State Bar dues	State Bar of Wisconsin	2013-2019	
Police Citizen Academy shirts for Commissioners	Lark Uniform Company	2017, 2019	
CPAT preparation classes	Milwaukee Brotherhood of Firefighters		2018
Court reporter appearance fees & transcripts	Susan Taylor	2013-2020	
Mediation services	WI Community Services Inc	2013, 2017	
Communications consulting	Regalis Management	2019-2020	
Payment to contractor in lieu of grant money	Diamond Hanson		2109
Refund to State for grant funds which closed early	State of WI Dept. of Military Affairs		2019
FC/FF/PED background caregiver check	WI Dept. of Justice	2013-16, 2018	
Outreach/surveying--Lindsay Heights	Community Development Mgt. Partnerships	2017-2018	
Outreach/surveying--Sherman Park	Peppnation Sports Leadership Camps Inc.		2017

Outreach--Milwaukee County Parks	Peppnaton Sports Leadership Camps Inc.	2018-2019	
Outreach--Midnight League coaches pay	MPS Recreation Dept.		2018
Mental health support--reckless driving summit	Alfonzo Watkins MSE LPC		2019
Outreach--My Brother's Keeper Youth Summit	Ziedler Center for Public Discussion		2019
DOJ interview recording, marketing, promotion	Pwr Fwd Media		2018
Photographs of Commissioners and staff	Lila Aryan Photography		2019
Replace artwork damaged at Manney hearing	Unknown vendor		2015
Critical licensing, software, maintenance	Biddle Consulting Group	2014-17, 2019	
JobAps annual fee	Dept. of Employee Relations	2014-2019	
SPSS annual fee	IBM Corporation	2103, 2015-19	
AIM annual tech support fee	On Target Performance Systems Inc.	2015-2019	
Cell phone for Homeland Security	Verizon		2013
Maintenance on testing laserjet printer	Sentinel Technologies Inc		2015
Reimbursement to exam raters	various vendors	2013, 2015-19	
Food for outside exam raters	various vendors	2013-14, 2017	
Food for consultants	various vendors		2013
Food for test development meeting	various vendors		2013
Food for exam raters and monitors	various vendors	2013-2015-20	
Food for background/oral/WSE raters	various vendors	2018-2020	
Food for interview panel	Waterfront Deli		2018
Food for recruiting/open house event	various vendors	2013, 2015-18	
Food for discip. appeal panel (incl. parking)	various vendors	2015-2020	
Food for CampHero	Unknown vendor		2019
Food for Chief reappointment ceremonies	Unknown caterer	2014, 2016	
Food for community mtg. re Director appt.	Unknown vendor		2015
Food for community breakfast mtgs (Oper.Mgr)	Coffee Makes You Black		2017
Food for community events	Aramark, WI Voices Afr/Amer roundtable		2017
Food for WI Voices/Pwr Fwr Media DOJ mtg	Unknown vendor		2018
Food/water for FPC meetings	various vendors	2016-2020	
Train for exam rater with travel agent fee	Unknown vendor		2016
Airfare for exam raters with travel agent fee	Keystone Travel & airlines	2013, 15-17, 19	
Lodging for consultants	Aloft/Pfister/Hilton/Intercontinental	2013, 2015-16	
Lodging for raters	Aloft, Hyatt Place, Intercontinental	2013-14, 16-19	
Lodging for EMCD interviewee	Hyatt Hotels		2019
Reimburse travel expense for EMCD interviewee	Delta Airlines		2019
Reimburse relocation expenses	FPC Risk Auditor		2019
Parking validations for raters	Interpark	2013-2018	
Shuttles to exam venue	Go Riteway Transportation Group	2015-16, 2019	
Transportation of candidates to exam venue	Above & Beyond Services		2017
Transportation for field trip for Earn & Learn empl.	First Student Charter Buses		2019
Job analysis training for testing analyst	IPAC Conference		2016
Class--conducting effective internal investigations	Waukesha County Technical College		2019
Diversity conference registration for Buford	NAAHR Milwaukee Inc.		2019
Conference registration fee for Horton	IPMA		2017
Conference airfare	IPMA		2017
Conference lodging	IPMA		2017
Conference registration fee for staff	Women Leaders Conference		2020
Conference registration fee for Mirehouse	Governor's Conf. on Emerg. Mgt. & Home Sec.		2020
Reimburse expenses for travel to seminar	Executive Director	2013, 2018	
Reimburse expenses for travel to various seminars	Emergency Communcations Dir (DeHaan)	2017-2018	
Reimburse expenses for meals at seminar	IPMA (Horton)		2017
Reimburse for exam supplies purchased	FPC testing analyst	2013-2014	
Reimburse for appeal hearing expenses	various vendors		2015
Translation--live language interpretation	Jennifer Flamboe	2016-2017	
Translation--brochure, draft DOJ report & findings	Jennifer Flamboe	2016-2018	
Advertisements--billboards/videos/copywriting/ posters/bus wraps & shelters/translation	CI Design	2017-2019	
Advertisements--billboards/bus shelters	Clear Channel Outdoor		2017
Advertisements--billboard	National Muffler & Food Mart Inc		2017
Advertisements--bus posters	Vector Media Holding Corp		2019
Advertisements--bus wraps	Direct Media USA		2017
Advertisements--email blast	Sinclair Broadcast Group		2019


Advertisements--Executive Director vacancy	NACOLE & WI City/County Mgt Assn	2014
Advertisements--Executive Director vacancy	NACOLE	2014
Advertisements--FPC Staffing Services Mgr.	NACOLE	2016
Advertisements--Police Planning & Pol. Dir.	Dept. of Employee Relations	2016
Advertisements--EMCD	Dept. of Employee Relations	2019
Advertisements--Facebook	Facebook	2018-2019
Advertisements--television	Geofencing Campaign (WDJT TV)	2018
Advertisements--television	WVTV	2019
Advertisements--mobile site	WDJT TV	2018
Advertisements--MKECR Portal	Facebook	2018
Advertisements--newspaper	El Conquistador	2014-17, 2019
Advertisements--newspaper	Milwaukee Community Journal	2014-2017
Advertisements--newspaper	Milwaukee Courier	2014-2015
Advertisements--newspaper	Milwaukee Times	2014-2017
Advertisements--newspaper	Spanish Journal	2015, 2017
Advertisements--newspaper	Wisconsin Gazette	2017
Advertisement--4th annual dinner gala & awards	Pastors United Community Advocacy Inc	2017
Advertisements--radio	Unrecorded (Procard purchase)	2013
Advertisements--radio	Milwaukee Radio Group/Lakefront Communications--WJMR	2014-2019
Advertisements--radio	Capstar Radio Operating Group (Iheart Radio)	2017, 2019
Advertisements--radio	El Sol Broadcasting	2019
Advertisements--recruitment flyers	Minuteman Press	2017
Advertisements--posters	Milwaukee Public Schools	2018
Advertisements--video	Media Circus International	2017-2018
Recruitment materials--health guides	Johnson Media Consulting LLC	2014
Recruitment materials for CampHero	Sirchie	2017
Recruitment materials--swag	Will Enterprises	2014-2015
Recruitment materials--swag	Crestline Specialties Inc	2017-2019
Audio installation at courtroom	Select Sound Service	2015
Mail services	Dept. of Administration/Central Records	2013-2018
Paper (card stock, colored)	Dept. of Administration	2014
Remodeling	Dept. of Public works	2014-15, 2020
Telephone services	Dept. of Administration	2013-2019
Auxiliary program cost for employee	Dept. of Employee Relations	2013, 2017-18
Temp PSSI salary & fringe costs (FF/FC backgrounds)	Milwaukee Police Department	2018
Pool vehicle/rental car	Dept. of Public works	2013-14, 17-20
Chair replacements	National Business Furniture, Relax the Back	2013, 2016-17
Sit-to-stand desks	National Business Furniture / Amazon	2017, 2019
Ipads and Otterboxes for FPC meetings	Amazon	2019
Ipad power adapters & USB cables	Apple	2020
Computer cable for foot switch	Best Buy	2020
Surface pens	Best Buy	2020
Power cord for laptop	Amazon	2020

Appendix

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City of Milwaukee - Purchasing at a Glance

"It's in Your Hands"

Purchasing Method	Dollar Amount	Purchasing Requirements
Petty Cash	Up to \$100	Solicitation of quotes is at the discretion of the user dept. Receipt is required for reimbursement.
Procard	Up to \$5,000, <u>excluding</u> inventory items, items on a vendor contract, and professional services contracts (see Professional Services Contract section below) Unacceptable Procard purchases list available on MINT.	Procard purchases must be made with an emphasis on using Office of Small Business Development (OSBD)-certified SBE firms. The list of firms is posted on the OSBD website: https://milwaukee.diversitycompliance.com/ "Green Purchasing": In addition, we encourage the purchase of sustainably-sourced, recycled, and recyclable materials, as outlined on Mint.Milwaukee.gov/Be-Green-at-Work . In partnership with the efforts of the DOA-Environmental Collaboration Office, we encourage you to look for commonly known certificates that indicate that the product is "green"/sustainable as identified below in support of the environment. 
Voucher in FMIS	Up to \$5,000, <u>excluding</u> inventory items, items on a vendor contract, and professional services contracts (see Professional Services Contract section below)	One or more written quotes at the discretion of the user department with an emphasis on using certified SBE firms through the OSBD. Consider submitting a requisition for a vendor contract for repetitive purchases in excess of \$15,000 annually.

"Were in it together"

Purchasing Method	Dollar Amount	Purchasing Requirements
Jumpstart	Between \$5,000 and \$10,000	Dept. must submit a requisition and submit the following documents to Purchasing: <ul style="list-style-type: none"> • Quotes from at least three vendors • A signed Request for Pricing form Forms should have valid pricing, delivery dates, and a binding signature from the selected vendor. Purchasing will create a P.O. or Vendor Contract.
Informal Bid, Request for Proposal (RFP), or Exception to Bid	Between \$10,001 and \$50,000	Dept. must enter a requisition. Purchasing will conduct an informal bid, RFP, or exception to bid. If the purchase being requested is a sole source or single source, the Dept. must complete an Exception to Bid form.
Formal Bid, Request for Proposal (RFP), or Exception to Bid	Over \$50,000	Dept. must enter a requisition. Purchasing will conduct a formal bid, RFP, or exception to bid. If the purchase being requested is a sole source, single source, or request for an RFP, the Dept. must complete an Exception to Bid form.
Professional Services Contract	Any Dollar Amount	All professional services contracts, regardless of dollar amount, must be processed by Purchasing. Dept. must submit the following forms with the requisition: <ul style="list-style-type: none"> • Exception to Bid • Summary of Experience • Professional Services Contract Questionnaire • IT Requisition Questionnaire (for IT requisitions) Purchasing will create a P.O. or service contract.
IT and/or IT Related Procurement	Any Dollar Amount	Requires the submission of a requisition

Emergency Purchases

An Emergency Purchase is defined as a situation that threatens life, health, safety or the continuation of work. Failure to plan for timely requisition submittal does not constitute a "rush" for the Purchasing Division. Upon recognition of an emergency, immediately email (when possible) the City Purchasing Director for handling instructions. After obtaining approval, department must enter a confirming requisition. Include a note in the Line Comments with the name of the approver from Purchasing, the date of approval from Purchasing, and that it is a "confirming requisition".

Appendix

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Request: Anything where we pay to receive a service or benefit **without** having it go through Purchasing regardless of the dollar amount. From 2020 – 2013. Names, services, date or date range since we worked with them and amount of money.

Record search result: The services/benefits procured without a contract are listed on the accompanying spreadsheet. Listed below are the services/benefits that were procured with a contract through Purchasing for context purposes and are not included in the spreadsheet.

Contracts set up by Purchasing for use by all departments:

Office supplies

Dell computers

Vanguard Storage & Recovery, LLC (Lenovo computers)

Adobe software

CDW-G software

SHI International Corp. (software)

Paper

Quick Acquisition (backgrounds)

ADECCO (personnel)

Manpower (personnel)

Personnel Specialists Ltd (personnel)

Time Warner Cable – contract set up by City Clerk (?) but we paid for cable for 3 months due to contract issues.


Occupational Health Centers of the SW PA (aka Concentra) (drug tests and physical exams)

Contracts we requested from Purchasing:

Board of Regents, UW system, St. Norbert College (survey)

Copier lease

EB Jacobs (police entry-level and promotional exams)

Edward Claughton III – presentation of audit findings, travel & expenses—can't remember if this was a contract or not. Could also have been paid for with Contingent Funds 

I/O Solutions (fire entry-level and promotional exams)

Rudolph Konrad (later became plain vendor, but am considering him a contract for this audit)

Michael Skwierawski, Inc. (hearing examiner for Manney appeal)

Steven Brandl (use of force report)

West Allis Fire Dept. (CPAT testing)

Humber Mundie & McClary (psychological testing)

Winbourne Consulting (CAD consultant)

Notes:

CritiCall software & maintenance—we originally went through Purchasing to obtain the licenses, etc. but I do not believe it resulted in a contract. These costs are included on the spreadsheet.

IBM Corporation – We had a contract with them for several years, then decided it was more efficient to just pay them the annual fee without a contract. I will carry them on the spreadsheet throughout all of the years as if there was never any contract with them.

JobAps – This is a contract that DER sets up, not us; we just pay them our share every year. I'll include that cost in the spreadsheet since it's not our contract.

AIM – contract for FPC until 2017, then just plain vendor. Including all costs on spreadsheet.

DOJ Collaborative Committee – I did not include any of those costs on the spreadsheet as these expenses were incurred at the request of the committee.

Total number of outside exam raters:

2013 53

2014 0

2015 32

2016 54

2017 16

2018 6

2019 22

2020 0

TOTAL 183

3/31/20

Michael Skwierawski, Inc. (hearing examiner for Manney appeal)

Steven Brandl (use of force report)

West Allis Fire Dept. (CPAT testing)

Humber Mundie & McClary (psychological testing)

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2013 53

2014 0

2015 32

2016 54

2017 16

2018 6

2019 22

2020 0

TOTAL 183

Appendix

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2017 COMMUNITY OUTREACH ACTIVITIES

1/14/2020

ACCOUNT	ACCOUNT DESCRIPTION	EXPENSE DESCRIPTION	AMOUNT	SUB-TOTAL	TOTAL
630106	Food & Forage	Food for 2 FPC community conversation breakfast meetings and 1 Lindsey Heights outreach meeting [REDACTED] Coffee Makes You Black)	\$ [REDACTED]	[REDACTED]	[REDACTED]
632502	Building Rental	Food for Men's Health & Community Fair [REDACTED] and W/ Voices African American round table town hall meeting [REDACTED] Facilitation by Zeidler Center for Public Discussion of Police/Youth listening circles & dialogue report held at First Stage Theatre with Boys and Girls Club participants	\$ [REDACTED]	[REDACTED]	[REDACTED]
634004	Administrative Charges	Sponsorship of Latino Entrepreneurial Network Boot Camp	\$ [REDACTED]	[REDACTED]	[REDACTED]
634005	Other Professional Services	Sign language interpretation for FPC meeting [REDACTED] Smart Interpreting Services Inc.) and Spanish translation for FPC meeting (\$980 Southside Organizing Committee) Spanish translation fee for draft DOJ Findings and Recommendations, and for answers to the draft - Jennifer Flamboe DBA Equa Lingua Outreach and surveying work in Lindsey Heights and other targeted neighborhoods for FPC by CDMP SPA Holdings LLC Outreach to Sherman Park including food, field trips, daily activities, sports - RepNation Sports Leadership Camps	\$ [REDACTED] \$ [REDACTED] \$ [REDACTED] \$ [REDACTED] \$ [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
636501	Travel & Subsistence	Transportation of 3 FC candidates to exam site - Above and Beyond Services	\$ [REDACTED]	[REDACTED]	[REDACTED]
636503	Advertising	Ad for Pastors United Community Advocacy 4th annual dinner gala & awards banquet	\$ [REDACTED]	[REDACTED]	[REDACTED]

This report does not include costs for general office supplies, postage, etc. used

2018 COMMUNITY OUTREACH ACTIVITIES

1/15/2020

ACCOUNT	ACCOUNT DESCRIPTION	EXPENSE DESCRIPTION	AMOUNT	SUB-TOTAL	TOTAL
630106	Food & Forage	Food for MATC law enforcement career workshop (shared cost with MATC)	\$		
634005	Other Professional Services	Outreach and surveying work in Lindsey Heights and other targeted neighborhoods for FPC by CDMP SPA Holdings LLC	\$		
		Outreach to Sherman Park including field trips and sport activities - PeppNation Sports Leadership Camps	\$		
		Midnight League Spring and Summer Coaching Costs - Milwaukee Public Schools Recreation Dept.	\$		
636503	Advertising	Sponsorship of table at Exito Awards (Latino Entrepreneurial Network)	\$		
GRAND TOTAL					

This report does not include costs for general office supplies, postage, etc. used

2019 COMMUNITY OUTREACH ACTIVITIES

1/15/2020

ACCOUNT	ACCOUNT DESCRIPTION	EXPENSE DESCRIPTION	AMOUNT	SUB-TOTAL	TOTAL
632502	Building Rental	Rental of Milwaukee Tech High School for Reckless Driving Summit	\$ [REDACTED]	[REDACTED]	[REDACTED]
634005	Other Professional Services	Mental health support at Reckless Driving Summit Program LLC), My Brother's Keeper Youth Summit Outreach to Sherman Park including field trips and sport activities PeppNation Sports Leadership Camps	[REDACTED]	[REDACTED]	[REDACTED]
		Wake-up	[REDACTED]	[REDACTED]	[REDACTED]
		GRAND TOTAL	\$ [REDACTED]	[REDACTED]	[REDACTED]

This report does not include costs for general office supplies, postage, etc. used