

Cleveland Division of Police

Office of the
Inspector General
(OIG)

Manual of Duties and Authorities



(Feb. 2020)

TABLE OF CONTENTS

Section	Title	Page
I.	Police Inspector General	4
II.	Office of the Inspector General	5
III.	Operations of the OIG	8
IV.	Classifications of Work	10
V.	General Procedures	11
VI.	Deconfliction	15
VII.	Confidentiality	16
VIII.	Due Professional Care	16
IX.	Dispositions	17
X.	Follow Up	18
XI.	File Retention	18
XII.	Training	19
Appendix.	OIG Work Log	i

CLEVELAND DIVISION OF POLICE MISSION STATEMENT

The mission of the Cleveland Division of Police (hereinafter “CDP”, or “Division”) is to serve as guardians of the Cleveland community. Guided by the Constitution, we shall enforce the law, maintain order, and protect the lives, property, and rights of all people. We shall carry out our duties with a reverence for human life and in partnership with members of the community through professionalism, respect, integrity, dedication, and excellence in policing.

DIVISIONAL VALUES:

P PROFESSIONALISM

We take pride in ourselves, our profession and our community. Working as a team, we will be role models for our community by enthusiastically excelling in quality performance.

R RESPECT

We consistently treat all people with dignity, compassion, courtesy, and without prejudice. We will protect the constitutional and civil rights of everyone through impartial enforcement of the law.

I INTEGRITY

We uphold the public trust by being honest, competent, and consistent in our beliefs and actions. We hold ourselves accountable to the highest standards of moral and ethical conduct.

D DEDICATION

We dedicate ourselves to improve the quality of life by developing a partnership with the community. We are committed to protecting life and property, reducing fear, and providing a safe environment for all.

E EXCELLENCE

We hold ourselves to the highest standards of law enforcement. We will continuously improve the quality of our services through education, training and development.

I. POLICE INSPECTOR GENERAL.

A. Establishment of the Position.

1. After a full and complete negotiation between the United States Department of Justice and the City of Cleveland encompassing various operational aspects of the Division of Police, a settlement agreement was reached that has been memorialized in a Consent Decree (“Decree”) that went into effect on June 12, 2015¹. Paragraphs 250 through 256 of the Decree establish the position of the Police Inspector General of the Cleveland Division of Police.
2. When appointed, the Police Inspector General (hereinafter “IG”) will not be a current or former employee of the CDP.
3. The IG is appointed by the Mayor into the classified service of the City and reports directly to the Chief of Police.

B. Enumerated Authorities.

1. The Decree specifically enumerates duties of the IG that include the authority to do the following:
 - a. Review CDP policies and practices to determine compliance with state and federal law, effectiveness, consistency with principles of bias-free and community policing and procedural justice; whether they promote public and officer safety, and whether they are achieving the goals of the Decree;
 - b. Audit compliance with policies and procedures;
 - c. Conduct investigations;
 - d. Analyze trends;
 - e. Develop specific recommendations for reform concerning policies, procedures, practices, training, and equipment to improve police services and accountability;
 - f. Analyze investigations conducted by the Office of Professional Standards (hereinafter “OPS”) to determine whether they are timely, complete, thorough, and whether recommended dispositions are supported by the preponderance of the evidence;
 - g. Collect and analyze all sustained findings and the discipline imposed, including the use of mitigating and aggravating factors, to assess disciplinary trends and to determine whether

¹ *United States of America v. City of Cleveland*, United States District Court, Northern District of Ohio, Eastern Division, 1:15 CV 01046.

discipline is consistently applied, fair, and based on the nature of the allegation, and;

h. Make reports and recommendations for reform publicly available.²

2. The IG also has the authority to conduct investigations, analyze trends, and make reports and recommendations, as appropriate, at the request of the Chief of Police or the Mayor.³
3. The IG may also receive recommendations for additional inquiries from stakeholders in the agreement through the Chief of Police, the Mayor, or the Director of Public Safety.⁴

II. OFFICE OF THE INSPECTOR GENERAL (OIG)

A. Introduction.

1. In order to effectively and successfully meet the requirements of the Decree and to ensure that the CDP maintains its course in prioritizing police reform, the City has formed an office of the Police Inspector General (OIG).
2. The budget for the operations of the OIG will be visible as a separate line item in the annual budget proposal process of the City.⁵ The visibility of the office's budget will provide a transparent method to assure that the office has sufficient independence and resources to meet the goals and objectives of the Decree.
3. The OIG will have access to all CDP documents, databases, and information necessary to perform established functions including any raw data from sources such as the CDP's Data Collection and Analysis Coordinator.⁶
4. The purpose of this manual is to establish procedures for the OIG. It is the practice and vision of the OIG to be an internal quality assurance arm of the CDP that objectively and effectively supports informed and compassionate policing. The OIG has as a foundation the fundamental commitment to objectivity and accuracy, paired with empathy for community concerns and perspectives, employing best practices in law enforcement principals,

² Decree at ¶253.

³ *Id* at ¶254.

⁴ *Id*.

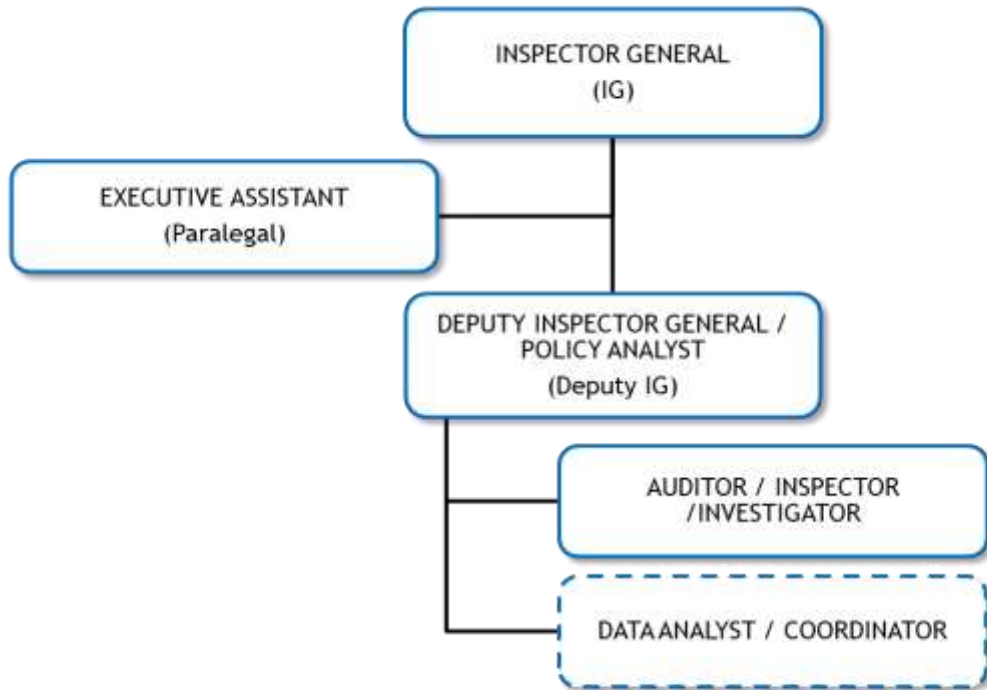
⁵ *Id* at ¶255.

⁶ *Id* at ¶256.

tactics, and constitutional procedures, which will lead to safer and more effective policing.

5. In order to fulfill the duties established in the Decree in conducting audits, reviews, investigations, policy work and analyses, the OIG has the current organizational structure, though not all positions have been authorized or funded at this time:

**Office of the Inspector General (OIG)
Organizational Structure**



6. The provisions of this manual and all associated General Police Orders (hereinafter “GPOs”) of the CDP govern the conduct and practices of the OIG.

B. Goals of the OIG.

1. The OIG will conduct objective, thorough, and timely inquiries in such a manner as to bring all available facts to light, while simultaneously preserving the context and circumstances relevant and required for fair results.

2. By the nature of their work, OIG's are held to the same or higher expectations than other government officials or offices in ethical and prudent usage of public resources. The CDP OIG should be free from personal or external impairments to independence and should constantly maintain an independent attitude and appearance.
3. The OIG exists within the overall framework of the CDP, reporting to the Chief of Police. The integrity of the office, however, relies on the ability to provide independent and objective assessments and recommendations. Staff of the OIG, with respect to duties being performed, will take direction only from the IG and not from CDP command staff or supervisors. That being the case, however, all members of the OIG must coordinate, work, liaise, and collaborate in a positive and professional manner with all members of the Division, no matter their rank or function.
4. In the spirit of the Decree, law enforcement services and policies should be driven by Community and Problem-Oriented Policing principles which in turn are driven by collected data. Therefore, the OIG will utilize that data as foundational in identifying and recommending innovations or best practices in policing and criminal justice in all of its work product and most importantly in supporting the principals of procedural justice.
5. The OIG, as a unit, is a fact-finding body, and as such is interested in establishing the truth through honest, full, fair, efficient, timely and thorough inquiry. It is essential to maintain an administrative process that advocates for the rights of all involved, including the CDP and members of the public.
6. The OIG is fully committed to making appropriate recommendations so that the CDP constantly improves in: the safety of its members and the public, community engagement, operational efficiency, and overall effectiveness in the provision of law enforcement services. As such when information is discovered that indicates areas for change and improvement they will be individually noted and referred not only to the Chief of Police, but to any relevant unit within the Division.

C. Definitions.

1. Authorizing Administrator – refers to either the Chief of the Division, the Director of Public Safety, or the Mayor of the City of Cleveland, all of whom have the authority to assign topics of inquiry to the OIG.

2. Work Plan – refers to a document created annually by the OIG describing completed, pending and planned activities during a calendar year.
3. Work Product – refers to documents, reports or recommendations created and categorized through the work of members of the OIG.

III. OPERATIONS OF THE OIG.

- A. The IG is the appointed, civilian head of the OIG and reports directly to the Chief of Police.
- B. The IG is ultimately responsible for and directs all the activities of the OIG. The IG reserves the right to delegate authority to the Deputy IG or other designee.
- C. The IG is also responsible for:
 1. Ensuring that the goals and aspirations of the Decree are taken into account and implemented in the work assignments and Work Product of the OIG.
 2. Directing that the duties and review required in the applicable sections of the Decree are accomplished in a timely manner.
 3. Maintaining strong liaison with and creating strong communications channels with internal and external organizations similarly involved in compliance with the Decree or those that are required to report to the IG, e.g. the Office of Professional Standards (“OPS”), Internal Affairs (“IA”), the Community Police Commission (“CPC”) and various units within the CDP.
 4. Reviewing for acceptance any requests of the office from external sources and making appropriate prioritizations and recommendations.
 5. Managing the administration, evaluation and supervision of all OIG personnel, its office functions, and its technology.
 6. Making all appropriate reports and recommendations available to the public.
 7. Ensuring proper review of CDP operations, especially determining whether: operations are timely; that they are conducted with integrity using the principles of bias-free policing, are objective and complete; that they are supported by a preponderance of the evidence when applicable and are consistent throughout the Division; and that issues uncovered regarding

policies, tactics, training or equipment are appropriately disseminated throughout the CDP.

8. The IG has the authority to require further inquiry or fact gathering as necessary and is the final and sole decision-making authority relating to recommendations made to the Chief of Police. The final authority for acceptance or rejection of the recommendations will rest with the Chief of Police.
- D. The Deputy IG is the primary assistant of the IG.
- E. The Deputy IG serves in the stead of the IG during any absence from office.
- F. The Deputy IG is also responsible for:
1. Administrative functions of the OIG, including, but not limited to operations, finance, budget, and HR.
 2. Ensuring appropriate and regular training for all members of the OIG.
 3. When staffing allows, public relations, communications and community outreach functions of the OIG. This includes service as the primary liaison with the CPC.
 4. All other duties assigned to them by the IG.
- G. The Executive Assistant to the IG will be responsible to assist in workflow, office operations, document preparation, reporting, calendaring, correspondence, file and records maintenance, and any other duties assigned to them.
- H. Specialized Positions within the OIG (Auditors / Investigators / Analysts) are responsible to conduct Audits, investigations, analyses, reports and Reviews as assigned by the IG in accordance with their specific position specialty or any hybrid position combination thereof. Additionally, they are responsible for any other duties as delegated or assigned to them through the chain of command of the OIG or in the assistance of other members of the OIG.
- I. It is presumed within the boundaries of the IG's authority that workloads may fluctuate greatly depending on need and time, therefore the Division, the Department of Public Safety, and the City may detail or approve temporary help in the form of its members/employees or other contracted persons or services to assist in the general workload, specific projects, or classifications of work.

IV. CLASSIFICATIONS OF WORK.

- A. The Decree specifically identifies several work functions required of the OIG in order to determine whether the CDP is delivering constitutional, professional, safe and effective public law enforcement services consistent with current best practices and meeting its mission in a way that reflects the collaboration with and values of the communities it serves. In order to effectively manage those functions, the OIG will categorize required and requested Work Products as follows:
1. **Audits (A):** Audits are an important tool employed by the OIG. They tend towards being highly resource intensive due to the level of necessary detail to meet recognized standards as well as the size and scope of the organization. Audits will generally be performed by qualified personnel to Generally Accepted Government Auditing Standards (GAGAS).
 2. **Reviews (R):** Reviews are equally as important in determining compliance as audits, however, they are less resource dependent and detailed as not all auditing standards are required for satisfactory completion and reporting. Often this is due to limited time, scope, or resources. The Decree identifies CDP policies and practices as a primary but not sole focus of review⁷.
 3. **Policy Work (P):** The OIG is charged with determining compliance with policy and procedure (*supra*) as well as with making recommendations concerning those policies and procedures along with other aspects of CDP operations⁸. Necessarily, the OIG will work closely with CDP personnel, especially in the Policy and Procedures Unit in making recommendations for new policy or modification and amendments to old policy to ensure compliance with the Decree and meeting its overarching goals and aspirations. The category of Policy Work will encompass all activities around CDP policy and procedure *except* audits or reviews of compliance which will be considered Audits or Reviews as applicable.
 4. **Interagency Requests (I):** It is recognized that there are numerous entities working under the auspices of the Decree to accomplish its lofty goals and mission. These include recommending bodies like the CPC and OPS. Should these agencies make a request through the Chief of Police, the Director of Public Safety, or the Mayor for action by the OIG, the OIG will make every attempt to assess and advise the Authorizing Administrator whether, in the opinion of the OIG, the project should be accepted, declined, or deferred. Deferral is reserved for those requests wherein the topic is

⁷ *Id* at ¶253(a).

⁸ *Id* at ¶253(e).

appropriate for OIG oversight but circumstances prevent immediate action (i.e. lack of collected data, constraints on OIG resources, timeliness, etc.). All such requests will be catalogued and maintained by the OIG regardless of the recommendation made to the Authorizing Administrator.

5. **OPS Review (O):** The Decree provides the OIG authority to analyze investigations conducted by OPS to determine whether they are timely, complete, thorough, and whether recommended dispositions are supported by the preponderance of the evidence⁹. All work done regarding auditing, reviewing, recommendations, or other oversight of OPS will be categorized here.
6. **Special Projects (S):** The Decree provides the OIG authority to conduct investigations, analyze trends, and make reports and recommendations at the request of the Chief of Police or the Mayor¹⁰. The OIG will make every attempt to assess and advise either of these Authorizing Administrators whether, in the opinion of the OIG, the project should be accepted, declined, or deferred as described in paragraph 4, *supra*.
7. **Miscellaneous, Self-Initiated, Investigations and Other (M):** All other work assignments or Work Product of the OIG shall be categorized as Miscellaneous, regardless of the project, product or assignor. This could include advisory memoranda, or memoranda of declination/deferral.

V. GENERAL PROCEDURES

- A. The OIG will create an annual Work Plan which will be submitted to the Chief of the Division by January 15 of each calendar year. The Work Plan will identify topics which the OIG intends to devote staff and resources to during the year. This Work Plan may be modified at various times during each year to accommodate unforeseen circumstances, emergent issues, budget and staffing constraints, and reconfiguring and balancing of priorities over time. The Work Plan will take into account any information provided by stakeholders, especially through Authorizing Administrators. The Work Plan will also present summaries of activities completed or pending from prior years' Work Product.
- B. The OIG will create and maintain a log of scheduled and requested Work Products that will include the type of Work Product, the basis or request, the personnel assigned, status dates and a log entry or reference number which will consist of the last two digits of the assigned/scheduled calendar year, a sequential number starting

⁹ *Id* at ¶253(f).

¹⁰ *Id* at ¶254.

at 1 each calendar year, and a hyphen followed by a letter designation of the Work Product types from Section IV above (e.g. 19001-A). *See Appendices.*

C. The OIG has a limited staff and resources. The OIG will use its limited resources to achieve the greatest return to the City and the Division by utilizing prioritization methods. The OIG will assess scheduled or requested Work Product for prioritization using a risk matrix methodology wherein severity of impact and likelihood of event are the driving factors in determining risk. Prioritization will be assessed and informed by the OIG using the risk assessment matrix below:

		Impact →				
		Negligible	Minor	Moderate	Significant	Severe
Likelihood ↑	Very Likely	Low Med	Medium	Med Hi	High	High
	Likely	Low	Low Med	Medium	Med Hi	High
	Possible	Low	Low Med	Medium	Med Hi	Med Hi
	Unlikely	Low	Low Med	Low Med	Medium	Med Hi
	Very Unlikely	Low	Low	Low Med	Medium	Medium

Additionally, the following considerations will become part of the prioritization process:

1. Organizational vulnerability to fraud, other crimes, waste, abuse or mismanagement.
2. The needs and priorities of the CDP, the Department of Public Safety and the City of Cleveland.
3. The benefits likely to accrue from OIG work, including improvement in internal controls; improvement in economy, efficiency and effectiveness; detection and prevention of fraud, waste, abuse and mismanagement; and cost recovery.
4. Cost effectiveness, or the cost benefit analysis of the anticipated Work Product.
5. Possibility of alternative OIG actions, for example, systemic review vs. individually identified problem review.

D. The OIG is not authorized to process complaints about individual officers or incidents. It is contemplated, however, that persons unfamiliar with the office or the role may choose to contact the OIG directly with specific complaints about misconduct or policy violation. Therefore, all members of the OIG will be familiar with the current GPO’s, policies and procedures, and requirements for the intake of

complaints and appropriate referral. That may be by referral to the OPS or to IA or other agency or unit as dictated by policy. These types of situations will be logged and maintained as Miscellaneous Work Product.

- E. Similarly, it is contemplated that information or complaints may come in to the office of the OIG that are within the purview of other or more appropriate Departments or agencies. The OIG will, by memorandum and with the knowledge of the Chief of Police, refer this information to appropriate law enforcement, prosecutorial, attorneys general or other agency with specific jurisdictional authority, again after being logged and maintained as Miscellaneous Work Product.
- F. The OIG will create objective, comprehensive, and timely Work Product whether initiated by or referred to the office. All Work Product that are not simple memoranda or referral will be prepared utilizing a template as approved by the IG and containing contents not limited to the following:
 - 1. Title Page.
 - 2. Introduction and/or Summary.
 - 3. Abbreviations and Acronyms (Optional).
 - 4. Table of Contents (Optional).
 - 5. Objectives, Scope and Methodology.
 - 6. Background.
 - 7. Findings and/or Recommendations.
 - 8. Other Matters or Issues for Consideration.
 - 9. Summary / Conclusion (Optional).
 - 10. Management Response (Optional or if required by auditing standards).
 - 11. Addenda/Appendices (as applicable).
- G. The preparation of any Audit, Review or other Work Product should generally include formal recommendations for action by the Division or the City. When possible, or as required by auditing standards, responses from the applicable unit or department should be memorialized in the Work Product. Alternatively, a report may be created that summarizes the Work Product and reports on responses received.
- H. Per the Decree the OIG will collect and maintain a file of information regarding all sustained findings and the discipline imposed, including the use of mitigating and aggravating factors with purpose to analyze trends, determine consistency and assess fairness. Any analyses of this data will be assigned as a project requiring formal written Work Product categorized as Miscellaneous (Section IV (A) (7) above).

- I. Per the Decree the OIG will maintain up to date awareness of best practices and model policies for law enforcement operations as well as operational awareness of pending and approved legislative changes affecting the operations of the Division. Through memorandum to the Policy and Procedures Unit, the OIG will make recommendations to update or comply as necessary, such memoranda also to be categorized as Policy Work Product.
- J. Only the following methods may be used in assessments and Work Products:
 1. Obtaining publicly available information.
 2. Accessing and examining CDP records, databases and software and obtaining information from any CDP personnel.
 3. Accessing and examining records maintained by and requested from other governmental entities or agencies.
 4. Using online services and resources.
 5. Interviewing or requesting information from members of the public and private entities.
 6. Accepting and vetting information voluntarily provided by third parties, including information obtained through legal process initiated by other agencies.
- J. Members of the OIG staff should disqualify themselves from work on or completion of Work Product as soon as practicable and notice must be provided directly to the IG in circumstances including, but not limited to:
 1. Official, professional, personal, or financial relationships that might appear to lead the OIG to limit the extent or quality of the work or to alter the outcome of the work.
 2. Preconceived ideas toward activities, individuals, groups, organizations, objectives, or particular programs that could bias the outcome of the work.
 3. Previous involvement, especially close in time, in decision making or management capacity that could affect the work.
 4. Biases that may affect the objectivity in performance of the work.

5. Any situation that may be perceived as an actual conflict of interest for the staff member.
- K. Members of the OIG shall immediately notify the IG of any actions occur which would interfere with the ability of the OIG to form independent and objective opinions and conclusions, including but not limited to the following:
1. Interference with OIG access to documents, data or personnel to perform OIG work.
 2. Improper political pressures that affect selection of work to be done, performance of that work, or objective reporting and conclusions without detrimental response.
 3. Any influence that jeopardizes continued employment with the OIG for reasons other than competency or ability to perform necessary work.
 4. Interference or restrictions on staffing, budgeting or other resources necessary to perform work with the intention of negatively impacting the OIG's independent work product.
- L. The procedures set out in this Manual shall be strictly adhered to by each member assigned to the OIG. This Manual is enforceable as Divisional policy. These procedures are binding on all personnel whether assigned or detailed to the OIG. Any deviation from or in violation of the rules prescribed in this Manual may be deemed a basis for disciplinary action.

VI. DECONFLICTION.

- A. In the operation of the OIG, all activities should be coordinated both internally and externally with other units or sections of the CDP, other Departments in the City, as well as other governmental agencies. This is to ensure effective and efficient usage of limited resources as well as to avoid fragmentation or duplication of efforts. The OIG may maintain a liaison relationship with these external organizations and provide necessary support while keeping apprised of impacts on the Division for any work outside the scope of work currently assigned within the office.
- B. Upon beginning new Work Product and as part of the prioritization or recommendations process, the OIG should review any information regarding prior reviews of that activity or function, whether that Work Product was completed by the OIG or other agency. Information available from prior work should be utilized to the fullest extent possible to reduce additional workloads on the OIG.

- C. The OIG should be as aware as possible of the functions and work of other groups performing independent evaluations, or other work similar in content or scope. The OIG should ensure that appropriate steps are taken to avoid unnecessary duplication of work and should coordinate its own work internally appropriately.
- D. OIG staff should be cognizant of situations where Work Product in progress might affect other governmental organizations. The OIG will coordinate, with the Chief's Office as appropriate, notification to, cooperation with, and possible joint or coordinated reviews or data sharing with those other parties to ensure that each entities needs are fulfilled and the interests of justice are preserved.

VII. CONFIDENTIALITY.

- A. The OIG may have information from confidential sources who will not have their identities disclosed without their consent unless the OIG determines that such disclosure is required by law or necessary to further the purposes of an Audit, investigation, inspection, evaluation, Review or other inquiry.
- B. Additionally, any privileged or confidential information gathered by the OIG will be protected from disclosure unless the OIG determines that such disclosure is required by law or necessary to further the purposes of an Audit, investigation, inspection, evaluation, Review, or other inquiry.
- C. The OIG is required to do intensive fact gathering. Many of those facts are gathered from employees or other individuals who may be subject to harassment or retribution if it was known that they had provided information to the OIG. Other facts are based in information that comes from personal or proprietary sources. Therefore it is necessary that the OIG comply with any legal mandates to safeguard confidential sources and protect sensitive information compiled during preparation of Work Product unless release is otherwise required by law, especially the Ohio Public Records Act as currently legislated.

VIII. DUE PROFESSIONAL CARE.

- A. Members of the OIG will use due professional care in choosing inspection, evaluation and review subjects and methodologies, in creating accurate Work Product and in preparing reports. Due professional care presumes a working knowledge consistent with the objectives of the Decree and in the context of the operations of the CDP. Due professional care requires the following:
 - 1. Standards – OIG should follow and comply with professional standards, especially in the context of the operations of the CDP and the OPS. If issues

of illegal behavior arise, the OIG will promptly present the information to the IG for review and referral. Members of the OIG may rely on the work of others to the extent feasible once satisfied with the quality of the work by appropriate testing or other means.

2. Thoroughness – Work Product should be conducted in a diligent and complete manner, and reasonable steps should be taken to ensure pertinent issues are sufficiently resolved and to ensure that all appropriate criminal, civil, contractual, or administrative remedies are considered.
3. Legal Requirements – Work Product should be initiated, conducted and reported in accordance with all applicable laws, rules, and regulations.
4. Appropriate Techniques – Methods and techniques used in creation of Work Product should be appropriate for the circumstances and objectives in light of available resources.
5. Objectivity – Facts should be gathered and reported in a fair, unbiased, and independent manner to convince the Work Product user of the validity of the conclusions and recommendations made.
6. Ethics – At all times the actions of the OIG staff should conform to the high standards of conduct expected from OIG staff.
7. Timeliness – All work should be conducted and reported with due diligence in a timely manner while recognizing the complexities of each case or project situation.
8. Accurate and Complete Documentation – Work Product findings, conclusions and recommendations should be supported by adequate documentation.
9. Coordination – OIG staff should coordinate the results of Work Product with appropriate officials.

IX. DISPOSITIONS.

- A. Work Product may be completed and removed from active investigation, consideration, audit or review with the following approved dispositions:
 1. Report Completed / Recommendations Made.
 2. Advisory Memorandum Provided.

3. Consolidation with other OIG Work Product.
4. Referral to CDP IA.
5. Referral to OPS.
6. Referral to Other Outside Agency/Authority.
7. Deferred – while appropriate for OIG action, the request/project will not be accepted due to reasons outside the substantive subject of inquiry, including, but not limited to: timeliness, lack of available data, lack of OIG resources including staffing, lack of Subject Matter Expert availability, lack of assessed risk priority, inability to adequately protect confidential information sources.
8. Declined – not appropriate for initiation of OIG action for reasons including, but not limited to: duplication of prior Work Product, conflict with other known investigations or reviews both internal and external, lack of venue/jurisdiction, conflict with authorities of the OIG.

X. FOLLOW UP.

- A. During the final drafting process and prior to publication of final Work Product, the OIG will encourage feedback and response from involved units or parties. Such responses may be appended to or summarized in the final draft with all intention of striving for acceptance of recommendations. In the alternative, a final report may be created which will contain both the formal recommendations and supporting information as well as any formal response if that response was not prepared or available prior to formal presentation of the Work Product.
- B. In order to ensure ultimate success in inspection, evaluation or review, it is necessary to determine whether required corrective actions have been taken. Therefore, the OIG should take steps as resources allow to determine whether recommendations have been instituted in a timely, complete and reasonable manner to correct identified issues. This may include requests for corrective action plans and timelines for completion.

XI. FILE RETENTION.

- A. Records of the OIG, including drafts and final Work Product will be retained by the office for the period currently listed in a state approved RC-2 Record Retention Schedule for the CDP, or as otherwise required by law.

XII. TRAINING.

- A. All new personnel assigned to the OIG will receive training or certifications as available and applicable in six areas of core competency established by the Association of Inspectors General. The training will be adequate in quality, quantity, scope, and type and consistent with national standards and best practice, including instructions in:
1. Context of the inspector general function. (Including the specifics of the position created by the Decree and expectations thereof.)
 2. Ethics.
 3. Public management issues.
 4. Legal issues.
 5. Audits, inspections and reviews.
 6. Investigating fraud, waste and abuse.
- B. Additionally, personnel assigned to the OIG will be provided training in software and databases used and available to the CDP; training as required by the HR Department of the City; and training in various aspects of the operations of a law enforcement agency including some of the specific trainings required by the Decree.
- C. The IG in consultation with the Chief or their designee will select outside vendors that may be considered for this training.
- D. It is recommended that each member of the OIG complete at least 24 hours of annual continuing professional education to directly enhance their proficiencies. This education should be in subjects directly related to the members' position and responsibilities with the OIG or the specific and unique environment in which the OIG operates.

RELATED ORDERS, REFERENCES AND MANUALS:

GPO 1.3.15 Investigations of Police Conduct (9/10/07 or current version).
Office of Professional Standards, Operating Manual and Procedures (2/7/17 or current version).
Ohio Public Records Act, Ohio Revised Code §149.43.