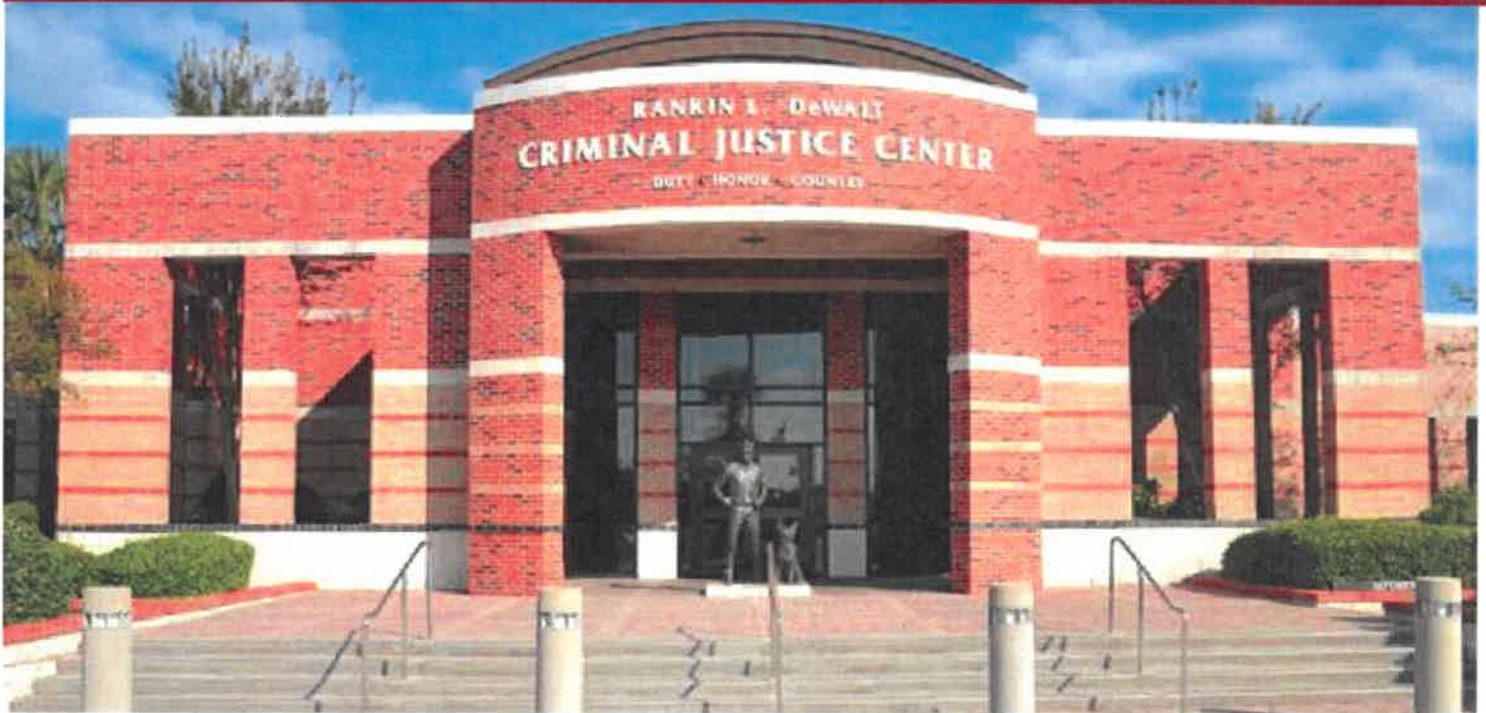


Professional Standards Review

A Strategic Review of Internal Affairs Operations



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Guiding Your Path to Success



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Table of Contents

Executive Summary	3
Purpose of the Review	4
Context and Scope	5
Methodology	6
Initial Evaluation & Review Process	8
Findings & Observations	10
Best Practices Review	13

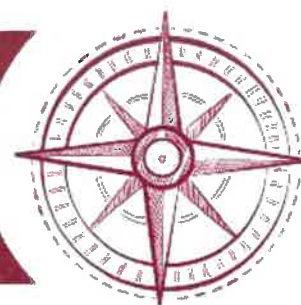


Table of Contents (cont)

Evaluation Summary	15
Strengths of Current Practices	17
Recommendations	19
Impact Analysis	23
Comprehensive Policy Review	26
Limitations of the Review	33
Conclusion	35

Executive Summary

The Texas City Police Department (TCPD) enlisted Paradigm Strategic Partners, LLC to evaluate its Internal Affairs (IA) procedures with the goal of improving operational efficiency, transparency, and internal relationships. This evaluation identifies significant challenges in TCPD's IA processes, including:

- An overloaded IA division.
- Inconsistent record keeping.
- Limited supervisory discretion in addressing minor violations.

To address these issues, the report outlines practical recommendations, including the implementation of a tiered disciplinary process, standardization of recordkeeping, and the allocation of dedicated resources for IA investigations. These changes aim to reduce costs, improve morale, and align TCPD's practices with industry standards.

The findings and recommendations in this report aim to balance TCPD's organizational needs with community expectations while maintaining compliance with state laws and collective bargaining agreements.

The assigned consultant, an active peace officer in Texas, was provided access to pertinent documents, including previous IA files reviewed by Paradigm Strategic Partners, to ensure a thorough analysis.

The findings, observations, and recommendations in this report are designed to improve IA operations while balancing organizational needs with community expectations.

Purpose of the Review

This evaluation aimed to address the following three objectives:

- **Increase Policy Effectiveness:** Ensure that IA processes adhere to state and national standards for transparency, efficiency, and fairness.
- **Enhance Transparency:** Address concerns from both officers and the public regarding the internal investigation process to foster trust and accountability.
- **Strengthen Officer-Administration Relationships:** Identify and mitigate procedural shortcomings that contribute to tension between department leadership and rank-and-file personnel.

This evaluation was conducted over two business days at the TCPD administrative offices and included the following activities:

- **Interviews:** Discussions with IA staff, patrol supervisors at the ranks of Sergeant, Lieutenant, and Captain, as well as Assistant Chief Manuel Johnson and Chief Landis Cravens.
- **Document Analysis:** Review of TCPD general orders, City of Texas City Policy and Procedures, open and closed IA case files, IA intake forms, and logs of allegations against officers.
- **Best Practices Comparison:** Benchmarking TCPD's procedures against standards set by the Texas Police Chiefs Association (TPCA) and the City of Pearland PD, a similarly sized agency.

Context and Scope

Context

The evaluation was prompted by concerns about the efficiency and fairness of TCPD's IA procedures. Recent trends, including a high volume of cases, delays in resolution, and dissatisfaction among officers and the public, underscored the need for a comprehensive review. This evaluation sought to identify structural inefficiencies and align TCPD's practices with TPCA standards.

This report focuses on procedural improvements while ensuring compliance with state laws and collective bargaining agreements.

Scope

The review encompassed the following:

- **IA Case Files:** Analysis of IA case files from January 1 to October 2, 2024.
- **Interviews:** Discussions with IA staff, patrol supervisors, and department leadership to gather insights on existing processes.
- **Document Review:** Examination of TCPD's general orders, policies, and IA intake forms.
- **Best Practices Comparison:** Benchmarking against the procedures of peer agencies, particularly the City of Pearland PD.

To conduct this comprehensive evaluation, Paradigm Strategic Partners implemented a structured methodology combining qualitative and quantitative approaches:

Document Review

- **Scope:** Examined TCPD's internal policies, procedures, and guidelines related to IA operations.
- **Files Analyzed:**
 - IA case logs from January 1, 2024, to October 2, 2024, including allegations and dispositions.
 - Closed IA investigation files for accuracy and procedural adherence.
 - IA intake forms and department procedural manuals.
- **Objective:** Identify procedural bottlenecks, policy inconsistencies, and documentation deficiencies.

Stakeholder Interviews

- **Participants:**
 - IA personnel, including Officer Cunningham (current IA investigator).
 - Patrol supervisors (Sergeants, Lieutenants, and Captains).
 - Assistant Chief Manuel Johnson and Chief Landis Cravens.
- **Format:** Semi-structured interviews and group discussions.
- **Key Topics Discussed:**
 - Processes for complaint intake, investigation assignment, and case resolution.
 - Perceived challenges in handling infractions and complaints.
 - Supervisory roles in managing minor policy violations.

Best Practices Research

- **Reviewed** state and national guidelines for internal investigations, including TPCA recommendations.
- **Consulted** external resources to identify efficient IA practices for improving transparency, accountability, and operational efficiency.

Comparative Analysis

- **Benchmarked** TCPD's IA policies and practices against standards set by the Texas Police Chiefs Association (TPCA).
- **Reviewed** IA practices from the City of Pearland Police Department, a comparable agency in size and proximity.
- **Focused** on tiered case management, supervisor accountability, and recordkeeping practices.

Case Studies

- Two IA case files were selected for detailed evaluation to illustrate procedural issues:



- **Objective:** Identify errors in classification, documentation, and investigation escalation.

Observational Analysis

- **Conducted** an on-site evaluation over two business days at TCPD headquarters.
- **Observed** IA operations and workflows, including complaint intake and investigation processes.
- **Engaged** with on-duty supervisors to understand real-time decision-making and complaint management.

Initial Evaluation and Review Process

October 2nd, 2024

08

- Consultant Holden met with Officer Cunningham, the officer currently assigned to IA and professional standards, to discuss the process of complaints and referrals. The consultant reviewed the list of open IA cases from January 1, 2024, to October 2, 2024, which included 102 logged cases.
- It was discovered that all complaints or alleged policy infractions are documented, assigned a case number, and forwarded to Assistant Chief Manuel Johnson. He then assigns the case files to either a third-party consulting firm or one of his administrative Sergeants. Officer Cunningham, the professional standards investigator, indicated that she is not permitted to conduct investigations within her division.
- Consultant Holden inquired about the types of complaints or infractions that trigger an IA investigation and learned that TCPD's current directive mandates all complaints and infractions be forwarded to IA for formal investigation. It was also noted that officers are often unaware they are being investigated until they are notified of their Garrity rights via the automated system, "Power DMS."
- At the consultant's request, all available on-duty supervisors were asked to participate in discussions regarding the current disciplinary process. The Sergeant, Lieutenant, and Captain on duty confirmed that they are required to forward all issues, including minor infractions such as tardiness or incomplete reports, to the Assistant Chief's office, and no supervisor is allowed to handle these matters independently.
- Copies of departmental policies and procedures, as well as sample reports of recently closed IA investigations, were obtained for further review.

October 3rd, 2024

- Consultant Holden met again with Officer Cunningham to analyze the IA case logs and distinguish between minor policy violations and major infractions that could lead to significant legal actions or potential employee termination. Two case files were randomly selected for further evaluation.
- Holden also discussed the IA case flow with Officer Cunningham to better understand how files are handled throughout the process. Additionally, Holden requested information on the number of IA cases still open and those containing multiple allegations. Officer Cunningham indicated that compiling this data would require significant effort, and the requested information would be provided within one to two days.
- The initial review concluded, and the consultant proceeded with the best practices review and the recommendation portion of the report.

Initial Evaluation and Review Process (cont)

Overburdened Internal Affairs Division

- **Case Load Analysis**

- From January 1 to October 2, 2024, TCPD opened 102 IA cases, a caseload that exceeds what is typical for a department of its size, reflecting a structural inefficiency:
 - 8 cases were classified as citizen complaints.
 - 59 cases involved general policy violations.
 - 35 cases were logged under miscellaneous categories, such as minor infractions like tardiness, GPS idling, and failure to respond to home visits.

- **Root Cause**

- TCPD's policy requires all complaints, regardless of severity, to be escalated to IA. This approach:
 - Overextends IA resources, diverting attention from more serious cases that require in-depth investigation.
 - Reduces efficiency, forcing minor violations into the same formal investigation process as significant allegations.
 - Increases costs due to the necessity of third-party involvement to meet civil service and collective bargaining agreement deadlines.

- **Impact on Operations**

- The excessive number of cases compromises the IA division's ability to function effectively, delays resolution timelines, and contributes to staff frustration. This workload imbalance also projects an image of inefficiency to both officers and the public.

Inconsistent Record Keeping

- **Observations**

- Missing files, incomplete recordings, and improperly documented reports were prevalent across the reviewed IA case files.
- There are no standardized processes for maintaining and reconciling records, leading to discrepancies that undermine the integrity of investigations.

- **Consequences**

- Poor record keeping hinders accountability, transparency, and the department's ability to defend its decisions in the face of public or legal scrutiny.

Lack of Supervisor Empowerment

- Patrol supervisors (Sergeants, Lieutenants, and Captains) reported that they are not permitted to address minor infractions independently. The department's policy mandates that all complaints be forwarded to the Assistant Chief's office, even for minor issues like tardiness or incomplete reports.

- **Impact**

- Supervisors are stripped of their authority, weakening the chain of command.
- Officers perceive this as a lack of trust in their immediate supervisors, which negatively affects morale.
- Minor issues that could be addressed through counseling or corrective training are unnecessarily escalated to IA, further burdening the division.

Findings and Observations (cont)

Case Studies Highlighting Inefficiencies

- Case [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- Case [REDACTED]

- [REDACTED]
- [REDACTED]

A review of current best practices for IA investigations was conducted. As an accredited agency through the Texas Police Chiefs Association (TPCA), TCPD is expected to follow the recommended procedures set by TPCA, which served as the benchmark for this evaluation. Additionally, the IA procedures of the City of Pearland Police Department (PPD), a similarly sized agency in close geographic proximity to TCPD, were also considered for comparison.

TPCA Standard Policy on Internal Investigations:

- **Responsibilities of Supervisors:**
 - First-line supervisors are primarily responsible for enforcing compliance with departmental standards and orders.
 - Supervisors should closely observe the conduct and appearance of officers in their charge.
 - Supervisors must be alert to behavioral changes or problems in subordinates, documenting and escalating these when necessary.
 - Supervisors should recommend and, when appropriate, help conduct additional training for officers who do not meet established standards.
 - Counseling techniques, sanctioned by the department, should be used to correct minor, infrequent errors or poor performance. Counseling should also address any professional or personal issues affecting performance.
 - All counseling sessions must be documented.

TPCA Standard Policy on Internal Investigations (cont):

- **Responsibility for Handling Complaints:**

- All complaints alleging a violation of the law or policy must be investigated.
- Complaints concerning law enforcement operations are usually handled through the chain of command, beginning with the first-line supervisor.
- Complaints about law enforcement services, failure to provide service, or improper attitudes/behavior may be investigated by an assigned supervisor or the Chief of Police.
- Depending on the nature of the complaint, the Chief may request another agency or the Department of Public Safety (DPS) to handle the investigation.

- **Peer Comparison: City of Pearland Police Department:**

- The City of Pearland Police Department's tiered disciplinary policy serves as a model for balancing efficiency and accountability:
 - **Tiered Case Handling:** Minor infractions are handled by supervisors, while IA investigates only major cases or repeated infractions.
 - **Clean Slate Policy:** Officers have the opportunity to clear their records after a defined period of compliance, which encourages personal accountability and provides a structured path to rehabilitation.

- **Summary of Best Practices for TCPD:**

- As an accredited TPCA agency, TCPD is expected to:
 - Have supervisors manage minor policy violations through counseling, training, or corrective action.
 - Reserve IA for serious violations or repeated infractions that carry legal or organizational consequences

TCPD currently adheres to Best Practice Standards (BPS) for handling formal complaints from the public. As recommended by the TPCA and required by the State of Texas, all written complaints must be forwarded to the Chief of Police for assignment to an investigator, who must review and dispose of the complaint within a prescribed timeframe. However, TCPD has adopted a policy of referring all alleged violations to department administration for investigation, regardless of severity. This practice has led to an unusually high number of cases for the Professional Standards Division, which has resulted in the need for third-party assistance to complete investigations within civil service and collective bargaining deadlines. While using external firms for internal investigations helps meet deadlines, it is costly and can damage the department's reputation by raising questions about its internal competence.

Out of the 103 IA cases reviewed:

- 8 cases were classified as "Citizen Complaints."
- 59 cases involved "General Policy Violations."
- The remaining cases included miscellaneous categories such as "late to class," "GPS idling," "failure to answer home visits," and "UNK/does not exist."

Improper record keeping and a lack of standardization in the IA process made it difficult to reconcile IA files. Missing violations, incomplete recordings, and missing reports were common, resulting from the absence of dedicated personnel for uniform record keeping.

According to BPS, complaints are expected to be handled by the administration and investigated through the IA process. Of the 95 IA reports initiated by supervisory staff:

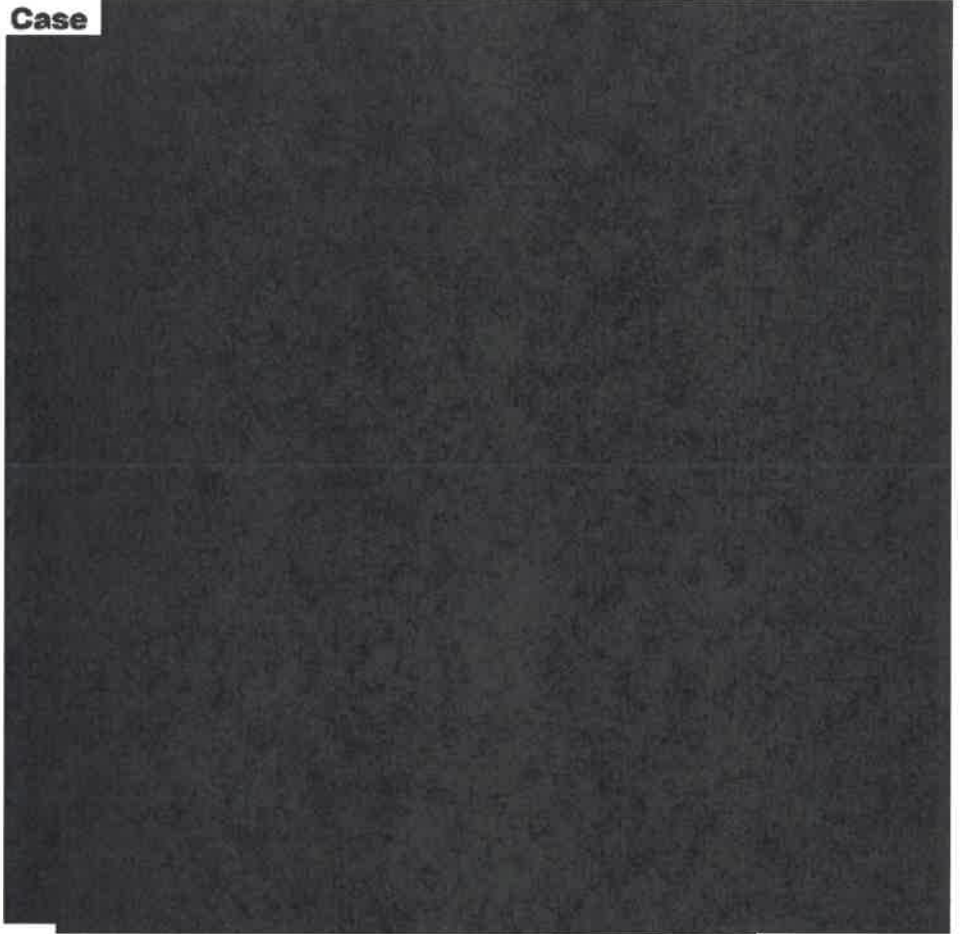
- 16 cases contained two or more violations, varying in severity.
- 27 cases had no violations listed in the file.
- The remaining cases were largely minor policy violations that could reasonably have been addressed by the Sergeant, Lieutenant, or Captain levels.

Evaluation Summary (cont)

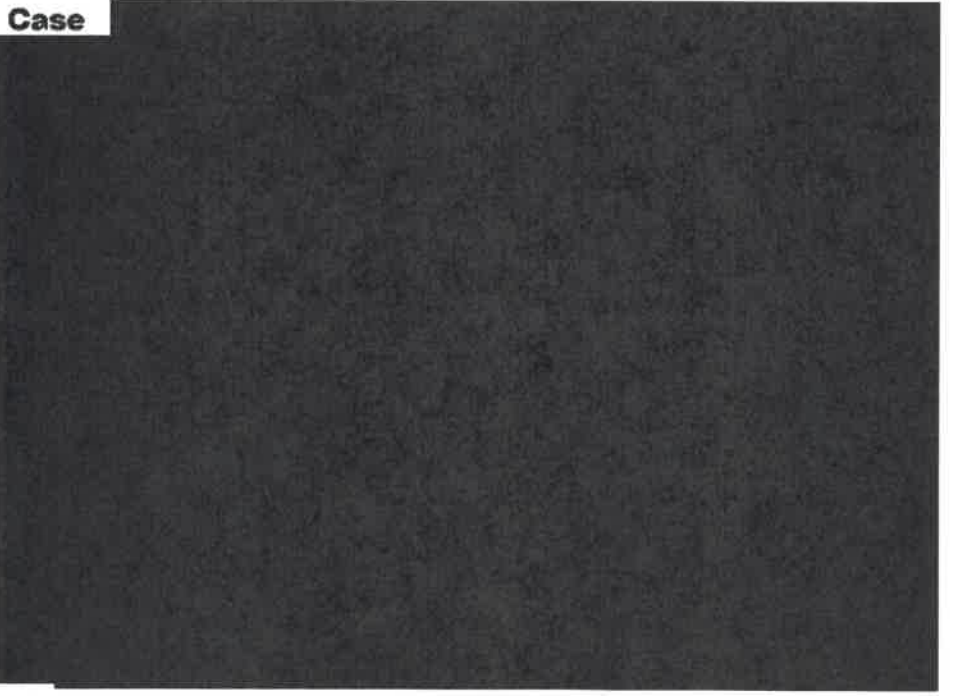
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Supporting Examples:

Case



Case



Despite the identified challenges, TCPD demonstrates several key strengths that form a strong foundation for its Internal Affairs (IA) practices and operations. These strengths provide a basis for addressing the department's challenges and improving overall efficiency:

- **TPCA Accreditation:** As an accredited agency through the Texas Police Chiefs Association (TPCA), TCPD adheres to best practice standards that ensure compliance with state and national law enforcement protocols. This accreditation not only demonstrates the department's commitment to excellence but also serves as an important benchmark for maintaining high standards in all operational areas, including internal investigations, training, and community engagement. The TPCA's guidelines provide a robust framework for effective policy development, officer conduct, and transparency in IA procedures.
- **Commitment to Transparency:** TCPD's willingness to engage third-party consultants in reviewing its IA processes underscores the department's commitment to transparency and continuous improvement. This openness to external review reflects a proactive approach to identifying inefficiencies, fostering accountability, and strengthening public trust. By seeking impartial assessments, TCPD demonstrates its dedication to upholding integrity in its internal investigations and its desire to address any concerns related to fairness, consistency, or objectivity in its disciplinary practices.
- **Technological Integration:** The department's use of advanced tools such as "Power DMS" for case notifications highlights its commitment to leveraging technology for more efficient operations. This system allows for real-time notifications and updates, which enhances the IA process by streamlining communication, reducing delays, and ensuring officers are informed of their rights and the status of their investigations in a timely manner. Furthermore, TCPD's willingness to embrace automated systems not only improves the internal investigation workflow but also positions the department to adopt additional technological innovations that can enhance efficiency, accountability, and reporting in the future.

Strengths of Current Practices

Strengths of Current Practices (cont)

- **Leadership Engagement and Support:** The leadership of TCPD, particularly the involvement of Chief Landis Cravens and Assistant Chief Manuel Johnson in the review process, demonstrates a strong commitment to improving departmental operations. Their active engagement in evaluating IA procedures and willingness to make necessary adjustments underscore their recognition of the importance of maintaining a fair, transparent, and effective internal investigation process. This leadership buy-in is crucial for driving future improvements and ensuring that new strategies are successfully implemented across the department.
- **Continuous Improvement Mindset:** TCPD exhibits a culture of continuous improvement through its ongoing evaluation of IA practices. The department recognizes the evolving nature of law enforcement challenges and is consistently looking for ways to enhance its internal systems, policies, and training programs. This forward-thinking attitude is critical for adapting to new regulations, community expectations, and best practices, ensuring that TCPD remains a progressive and responsive law enforcement agency.

Implement a Tiered Disciplinary Process

- **Minor Infractions:** Empower line supervisors (Sergeants, Lieutenants, and Captains) to address routine issues, such as tardiness, late reports, and improper conduct, through documented counseling, corrective actions, or training.
- **Major Infractions:** Reserve IA investigations for serious or repeat violations, including potential litigation, suspension, termination, or repeated misconduct. This distinction helps focus IA resources on more impactful cases while reducing the workload for minor violations.
- **Clear Definition of Roles:** Define and standardize these roles in departmental policy to ensure that supervisors handle appropriate infractions and that IA is reserved for more serious matters. This should be clearly outlined in the policy manual to prevent favoritism and ensure accountability.

Establish a Dedicated IA Division

- **Professional Standards Investigators:** Assign experienced, professionally trained officers (ranked Sergeant or higher) exclusively to handle all IA investigations. These officers should not be part of the general rank-and-file, ensuring they maintain objectivity and impartiality in their investigations.
- **Dedicated Focus:** Ensure that IA officers are fully dedicated to personnel investigations, including pre-employment backgrounds and IA inquiries. This allows them to maintain focus on their specialized duties without distraction from general operational tasks.

Standardize Record Keeping Practices

- **Clear Protocols:** Develop clear, standardized procedures for documenting IA cases, including categorization, timelines, and storage protocols. This will help streamline the process, ensure consistency, and facilitate tracking and retrieval of records.
 - **Digital Tools:** Implement digital systems to improve record management, reduce errors, and enhance transparency. Digital tools can help automate tracking and filing, making the process more efficient and easier to audit.

Revise Department Policies

- **Tiered Violation Levels:** Incorporate a tiered discipline structure into the policy manual that distinguishes between minor and major infractions. This will clarify the roles and responsibilities of supervisors and IA investigators, preventing the unnecessary escalation of minor issues to IA.
- **Reckoning Period:** Introduce a "reckoning period" for minor infractions, allowing officers to clear their records of minor violations after a certain period of sustained compliance. This encourages personal accountability and provides officers with an opportunity to reset and improve their performance.

Action Steps

- **Policy Revision:**

- Draft and approve a new tiered disciplinary system, incorporating clear definitions for minor and major infractions.
- Ensure that policies are aligned with the TPCA standards and that they are communicated to all department personnel for understanding and adherence.

- **Training:**

- Conduct workshops and training sessions for supervisors and IA personnel to familiarize them with the new policies and processes.
- Focus on empowering supervisors to handle minor infractions independently and ensuring IA investigators understand their revised scope of duties.

- **Resource Allocation:**

- Allocate funding to hire additional personnel specifically for IA investigations. This may include dedicated IA officers and administrative staff to support the workload.
- Invest in digital tools for recordkeeping and case management to increase efficiency and accuracy in documentation.

- **Phased Rollout:**

- Pilot the new policies and systems in one division or unit before implementing them department-wide. This will allow for adjustments and refinements before full deployment.
- Evaluate the pilot phase to measure the effectiveness and make necessary improvements before rolling out the new procedures department-wide.

Recommendations (cont)

Resources Needed

- **Additional Staffing:** Hiring additional personnel, including experienced IA officers and administrative support, to handle the increased workload and ensure investigations are handled efficiently.
- **Budget for Digital Tools:** Allocate funds for digital record keeping systems and automation tools to streamline IA operations and improve documentation accuracy.
- **Training Resources:** Budget for training sessions, including hiring external experts or consultants to deliver workshops and seminars for IA personnel and supervisory staff.

Expected Impact

- **Improved Efficiency:** By empowering supervisors to handle minor infractions and focusing IA efforts on serious cases, the department can reduce case overload and focus resources where they are most needed.
- **Enhanced Accountability:** The introduction of standardized recordkeeping and tiered disciplinary processes will improve consistency and transparency, reducing the potential for errors or favoritism.
- **Increased Morale:** Providing officers with the opportunity to clear minor violations from their records after sustained compliance will enhance trust in the department's disciplinary system and foster a more supportive environment for professional growth.

Short-Term Impacts

- **Reduced Case Backlog:**

- Implementing a tiered disciplinary system and empowering supervisors to handle minor infractions will significantly reduce the number of cases referred to the IA division. By addressing routine policy violations at the supervisor level, the department will be able to focus its resources on more serious cases.
- This shift will alleviate the overwhelming workload currently placed on IA investigators, allowing for quicker case resolution and more manageable caseloads.

- **Improved Morale:**

- Supervisors will regain their authority to handle minor issues, which will foster a sense of empowerment and trust in their leadership abilities. Officers will also experience improved morale as they see that minor violations are handled at the supervisory level, rather than escalating to formal investigations. This decentralized approach will promote a more positive work environment, as officers and supervisors will feel more in control of the disciplinary process. Officers will be more likely to engage with their supervisors to resolve issues in a timely manner without fear of unnecessary formalities.

- **Faster Resolution of Cases:**

- By focusing IA investigations on serious or repeated violations, the time it takes to resolve investigations will be reduced. The use of a more streamlined and targeted approach will lead to quicker conclusions and timely disciplinary actions, reducing delays and frustration within the department. Officers and the public will benefit from seeing that cases are handled more efficiently and consistently

Long-Term Benefits

- **Enhanced Efficiency and Transparency:**
 - The standardization of recordkeeping practices and the establishment of clear protocols for managing cases will create a more transparent and accountable IA process. With the introduction of digital tools and automation, the department can streamline the handling of complaints and improve the accuracy of case tracking.
 - This level of transparency will increase the public's confidence in the integrity of the department's internal investigations and its commitment to accountability.
 - The implementation of a tiered disciplinary structure will also prevent the unnecessary escalation of minor issues, ensuring that the department's resources are used effectively and focused on the most critical matters.
- **Strengthened Trust Between Officers, Administration, and the Community:**
 - By creating a more efficient and fair IA process, trust will be rebuilt between officers and department leadership, as well as with the community. Officers will have greater confidence in the fairness of the disciplinary process, knowing that minor infractions are handled at the appropriate level, and major issues are investigated thoroughly. The public will see that the department is committed to transparency and is addressing complaints in a fair and consistent manner.
 - This increased trust will improve relationships both internally within the department and externally with the community, leading to better cooperation and communication.

- **Cost Savings and Reduced Dependence on Third-Party Consultants:**
 - Reducing the volume of IA cases referred to external consultants will result in significant cost savings for the department. The need for third-party involvement will be minimized as supervisors are empowered to handle routine infractions and IA focuses on more serious cases. This reduction in reliance on external consultants will not only save money but also reduce the perception that the department lacks internal capacity to handle its own investigations. The department will be better equipped to manage its internal affairs more autonomously, with a focus on long-term sustainability and efficiency.
- **Improved Professional Development and Officer Retention:**
 - With the introduction of a clear, structured disciplinary process and a "clean slate" policy, officers will have a clearer path for professional growth. They will understand how minor infractions are handled and see the opportunity for improvement without the threat of permanent records that could affect their career progression. This clarity will contribute to greater job satisfaction and retention, as officers will feel more supported in their professional development. A structured and transparent process will encourage officers to be proactive in addressing their performance issues, knowing that corrective actions will be managed fairly.
- **Stronger Organizational Culture and Accountability:**
 - The implementation of these recommendations will foster a stronger, more positive organizational culture within TCPD. Empowering supervisors to manage minor issues will help develop leadership skills at the line level and encourage proactive problem-solving. The focus on accountability and transparency at all levels will create a culture where officers take ownership of their actions and feel a shared responsibility for the department's success. This strengthened organizational culture will translate into better overall performance, reduced misconduct, and a more cohesive and motivated workforce.

Lack of Guidance for Supervisory Action

An analysis of current policies within the Texas City Police Department (TCPD) has identified critical gaps and ambiguities that lead to inconsistent application, subjective decision-making, and unintended administrative burdens. A central concern is the implicit assumption within current policies that supervisors are expected to respond to situations identically to how the Chief would respond. While this approach is well-intentioned, it has led to inefficiencies by unnecessarily funneling minor administrative matters into formal internal affairs investigations (IA) and other administrative channels.

Example: Tardiness as a Case Study

The current policy states:

"Unexcused tardiness occurs when an employee fails to notify their supervisor of a valid reason for being late and permission is not granted by the supervisor."

However, the policy lacks clear definitions, expectations, or standardized guidelines for how supervisors should act or document these cases. This absence of structured guidance leaves significant discretion to individual supervisors, which can lead to several issues:

1. **Unclear Expectations:** While an officer may notify a supervisor of tardiness, the policy does not specify the supervisor's response or documentation requirements beyond this initial notification.
2. **Unchecked Discretion:** Supervisors may apply personal discretion inconsistently, leading to variations in how different officers are treated based on supervisor judgment.
3. **Administrative Burdens:** Because there is no clear guidance, minor issues are frequently escalated unnecessarily into formal IA investigations or administrative reviews.

The lack of clarity has inadvertently led to administrative centralization—shifting supervisory decisions toward Professional Standards and the Chief's oversight, thereby increasing workloads while reducing supervisors' ability to exercise proactive leadership.

Implications of Current Policy Gaps

The identified gaps have several administrative and operational consequences:

1. **Overburdened Administration:**

- The lack of defined expectations causes supervisors to escalate minor policy violations into formal investigations unnecessarily, diverting resources from higher-priority matters.

2. **Inconsistent Enforcement:**

- Ambiguities in policy allow supervisors to rely solely on personal judgment, leading to unequal responses and inconsistent disciplinary outcomes across units.

3. **Lack of Clear Standards:**

- Supervisors lack guidance on how to evaluate or document policy infractions, which increases personal liability and creates uncertainty in decision-making.

4. **Risk of Favoritism and Morale Issues:**

- LMX theory suggests that unequal supervisor relationships can lead to perceptions of favoritism. This, combined with inconsistent responses by supervisors, can erode trust and morale.

5. **Lack of Documentation:**

- The absence of clear and uniform documentation increases risks associated with legal review, administrative scrutiny, and employee grievances.

Comprehensive Policy Review (cont)

Recommendation: Establish Clear Guidelines for Supervisory Response

To address these gaps, Paradigm Strategic Partners recommends that TCPD adopt a structured policy framework that provides clear expectations, transparent documentation requirements, and actionable response protocols for supervisors. This will enable two key objectives:

- **Supervisor Empowerment:** Supervisors will have the tools, clarity, and confidence to act proactively without overburdening the Professional Standards or higher administration with minor issues.
- **Administrative Oversight:** Clear policies will ensure transparency and accountability while allowing the administration to monitor patterns of behavior and systemic trends without micromanaging day-to-day decisions.

Proposed Policy Adjustments

1. Clear Documentation and Supervisor Expectations

- Policies should explicitly define when documentation is required and how supervisors should act in common situations, such as tardiness.
- Supervisors should have structured, written guidance outlining how to evaluate and address common minor infractions.

Example: Supervisor Response to Tardiness

- Supervisor ensures that the employee has notified their supervisor.
- Supervisor determines if counseling or intervention is warranted.
- Supervisor documents the situation appropriately to provide clarity and transparency.

Proposed Policy Adjustments (cont)

2. Decision-Making Guidelines

- Supervisors should be empowered with written guidelines to determine which Issues can be resolved informally (through counseling or verbal correction) and which warrant escalation.
- Clear decision-making criteria should balance consistency, transparency, and operational flexibility.

3. Supervisor Training on Defined Roles and Boundaries

- Comprehensive training should ensure that all supervisors fully understand the new expectations, boundaries of decision-making, and how to balance operational discretion with administrative oversight.

4. Periodic Audits to Monitor Trends and Ensure Compliance

- Structured audits and reviews should be conducted regularly to identify trends, ensure fairness, and monitor whether administrative overreach or inconsistent responses are occurring.

Comprehensive Policy Review (cont)

How These Changes Empower Supervisors and Allow Oversight

The proposed policy changes provide a dual benefit by simultaneously empowering supervisors and establishing oversight mechanisms:

1. Supervisor Empowerment:

- Supervisors will be allowed to address minor infractions in real-time through proactive leadership such as counseling or verbal reminders.
- Supervisors can resolve behavioral issues without overburdening higher administrative divisions with minor matters.
- Clear documentation requirements build confidence by ensuring transparency and accountability in supervisor decision-making.

2. Department Oversight:

- Standardized documentation and periodic audits enable TCPD leadership to monitor patterns and trends related to policy breaches and performance issues.
- Oversight mechanisms ensure fairness and consistency while identifying systemic patterns that may require broader organizational response.
- Transparency improves as officers become aware that decisions are documented and can be reviewed if necessary.

How These Changes Address the Problem

The proposed adjustments target the root causes of administrative inefficiencies and inequities by:

1. Reducing Administrative Burden:

- Clear expectations will minimize unnecessary escalation of minor infractions into IA investigations or administrative reviews.

2. Promoting Consistency and Fair Treatment:

- Written guidelines will standardize responses, ensuring equity across all shifts, supervisors, and units.

3. Preserving Supervisor Discretion Where Appropriate:

- A clear framework provides guidance while allowing supervisors the flexibility to manage unique circumstances effectively.

4. Enhancing Training and Preparedness:

- Comprehensive supervisor training will ensure leaders are equipped with clarity and skills to make sound, informed decisions.

Expected Benefits of Recommended Changes

By implementing these recommendations, TCPD can anticipate the following benefits:

- **Reduced Administrative Strain:** Minor issues will no longer unnecessarily overburden IA and other administrative units.
- **Greater Clarity and Consistency:** Defined processes will ensure fair treatment and transparency across all levels.
- **Greater Accountability:** Proper documentation will ensure transparency and provide clear evidence in the event of challenges.
- **Trust and Morale:** Clear expectations and fair treatment foster trust and boost morale among officers and supervisors.
- **Legal and Risk Mitigation:** Transparent and well-documented policies will reduce risks related to inconsistent policy application and administrative overreach.

The proposed changes—centered on defining supervisory expectations, establishing clear documentation and response protocols, providing comprehensive training, and implementing periodic audits—will ensure fairness, transparency, and accountability across TCPD operations. These reforms will reduce administrative inefficiencies, minimize unnecessary escalations into IA investigations, and empower supervisors to lead proactively and decisively.

By implementing these policy changes, TCPD can achieve a balance between supervisor autonomy and departmental oversight, fostering trust, improving morale, and ensuring operational efficiency across all divisions.

While this evaluation provided valuable insights into TCPD's Internal Affairs (IA) processes, there were several limitations that impacted the scope and depth of the findings. These constraints should be taken into consideration when interpreting the results, and future evaluations could address these limitations to improve the comprehensiveness of the assessment.

✧ • **Limited Observation Period**

- The evaluation was conducted over the course of just two business days. While this provided an initial overview of IA practices and procedures, the short timeframe limited the ability to observe the full spectrum of departmental operations and ongoing cases. A more extended evaluation period would allow for a deeper understanding of the day-to-day challenges faced by IA personnel and the department's response to complaints. Longer observation would also provide the opportunity to examine how cases evolve over time, enabling a more thorough assessment of the effectiveness and consistency of the IA process.

• **Heavy Reliance on Existing Records**

- The evaluation heavily relied on existing IA case records, which presented challenges in terms of data accuracy and consistency. Many of the records reviewed were incomplete, missing key documentation, or did not follow a standardized format. These discrepancies hindered the ability to fully assess the quality of case handling and the adherence to procedural protocols. In some instances, missing information made it difficult to verify the outcome of investigations or understand the rationale behind decision-making. For future evaluations, a more comprehensive review of case records, possibly with a focus on both current and historical cases, would provide a clearer picture of the department's practices and the potential gaps in documentation and record-keeping.

Limitations of the Review

Limitations of the Review (cont)

- **Subjective Input from Stakeholders**

- While stakeholder interviews provided valuable qualitative data, the input gathered from officers, supervisors, and leadership was subject to personal biases and perspectives. Stakeholders' views may have been influenced by their individual experiences, departmental roles, or professional relationships. As a result, some feedback may have reflected personal perceptions rather than objective assessments of the IA process. In future evaluations, it may be beneficial to supplement stakeholder interviews with anonymous surveys or third-party assessments to gather a more balanced and unbiased perspective on the effectiveness of IA procedures.

- **Potential for Missing or Unreported Data**

- As with any internal review, there is a possibility that some cases or procedural issues were not fully reported or disclosed during the evaluation. Officers or staff may be hesitant to share negative feedback or concerns due to fear of retribution or a lack of trust in the review process. While the department's leadership demonstrated a commitment to transparency, future evaluations could include a broader range of anonymous feedback channels, ensuring that all perspectives—especially those from lower-ranking officers—are adequately represented in the assessment.

The Texas City Police Department (TCPD) has made notable efforts in ensuring transparency and compliance in its Internal Affairs (IA) procedures. However, as this evaluation has highlighted, there are significant challenges in the current IA system that hinder operational efficiency and procedural clarity. The department's current IA process is burdened by inefficiencies stemming from the overclassification of complaints, a lack of standardization in case handling, and an overwhelming caseload for IA investigators. These challenges not only impact the department's ability to manage and resolve cases in a timely manner but also contribute to rising costs and frustration among staff.

At the heart of the department's struggles is the policy of referring all complaints, regardless of severity, to IA. While this ensures a thorough investigation of all issues, it leads to an excessive caseload, diverts critical resources from more serious cases, and delays the resolution of cases. Additionally, the overclassification of minor infractions—such as tardiness or late reports—adds unnecessary strain to the IA division, which could be better managed at the supervisory level. The lack of standardized recordkeeping further complicates the situation, as it results in missing or incomplete documentation, undermining the integrity and efficiency of the IA process.

This report's recommendations—ranging from empowering supervisors to handle minor infractions to the establishment of a dedicated IA division and the implementation of standardized recordkeeping practices—offer practical solutions to address these inefficiencies. By streamlining the IA process, TCPD can ensure that investigations are focused on serious and repeat violations, while minor infractions are managed at the supervisory level, where they can be resolved more quickly and with less resource expenditure.

Conclusion

A Path Toward Transformation

Implementing these recommendations will enable the Texas City Police Department to transform its IA processes into a model of procedural excellence. The shift to a tiered disciplinary system, coupled with the establishment of a dedicated IA division and standardized recordkeeping practices, will address the current challenges of inefficiency, high case volume, and inconsistent case management. More importantly, these changes will foster a culture of transparency, accountability, and trust—both within the department and with the community it serves.

Through these improvements, TCPD will not only enhance its operational effectiveness but also strengthen internal relationships, boost officer morale, and improve public perceptions of the department. By ensuring that the IA process is fair, efficient, and transparent, TCPD will position itself as a leading example of best practices in law enforcement, benefiting its officers, its leadership, and the community as a whole.



Thank You

Paradigm Strategic Partners extends its gratitude to the Texas City Police Department for the opportunity to conduct this evaluation. We appreciate the transparency and cooperation demonstrated by Chief Landis Cravens, Assistant Chief Manuel Johnson, Officer Cunningham, and all supervisors and personnel who participated in this process.

Your commitment to excellence, accountability, and continuous improvement reflects the department's dedication to serving both its officers and the community with integrity and professionalism.

Thank you for trusting us to assist in guiding your path to success.