I. INTRODUCTION

The Internal Affairs Bureau ("IAB") Command Center (formerly known as the IAB "Action Desk")[1] serves as the central clearinghouse for allegations of corruption against police officers from the public and other members of the New York City Police Department ("Department"). The Command Center is open 24 hours a day and receives approximately 28,000 calls and 1,200 letters per year, not all of them corruption related.[2] With the exception of two non-recorded telephone lines reserved for members of the Department reporting wrongdoing, known as the "PRIDE" and "CORRUPT" lines,[3] the Command Center's telephone lines for call-in complaints are recorded automatically by a continuously operating, voice-activated recording machine.[4]

Because all allegations of police corruption flow through the Command Center, the Command Center officers' role is fundamental to the Department's effective investigation of corruption. By effectively receiving, recording, and processing corruption allegations, Command Center officers can enhance the Department's ability to fight corruption. If Command Center officers are ineffective and fail to elicit or record important information from callers, the Department may lose valuable information concerning possible police corruption, and corruption

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1. In May 1996, the Action Desk was converted to the Command Center. While the two are functional equivalents, the transition was occasioned, in part, by relocating the unit to a modernized facility located at IAB headquarters. Subsequent references to the Action Desk are for the purposes of accuracy and are made in the context of documents generated or studies performed before the development of the Command Center.

2. Among a variety of other functions, the Command Center also processes reports of IAB vehicle accidents, lost Department equipment and other administrative events. The Command Center also provides Department telephone numbers, addresses and other information to Department personnel. See infra at p. 52.

3. The "PRIDE" and "CORRUPT" complaint intake lines receive calls from members of the Department who, in most cases, wish to remain anonymous. Consistent with the heightened confidentiality of this reporting mechanism, calls to these lines are not recorded.

4. The Command Center's public telephone number for lodging complaints against members of the

investigations can be impeded. Moreover, because Command Center officers interact directly with the public, they have a critical opportunity to convey to the public the Department's commitment to fighting corruption. Command Center officers who are polite and professional, who create a comfortable atmosphere for callers, and who take callers' allegations seriously send a message that the Department is truly interested in combating corruption. Indeed, because members of the public call the Command Center when they, or a friend or family member, have had a negative experience with police officers, the officers assigned to the Command Center are in a unique position to provide callers with a positive experience and demonstrate that the Department treats corruption seriously.

Upon receiving an allegation concerning police corruption, misconduct, or other criminal activity, the Command Center officer generates a record of the call known as a "log." This log, which is automatically assigned a chronological number, referred to as a "log number," is supposed to contain all the pertinent information concerning the allegation provided by the caller. For example, the log should contain information concerning the identity of the subject officer, details of the nature of the conduct alleged, and identifying information about the caller. At the conclusion of a call in which a complaint is made, the Command Center officer should provide the caller with the log number and instruct her that this number should be used for further inquiries with respect to the status of the Department's investigation of the caller's allegation.

After generating the log, the Command Center officer performs a preliminary investigation concerning the allegation and the subject officer. For example, by means of the computer systems accessible in the Command Center, the officers can verify the names, phone

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Department is (212) 741-8401.

numbers and addresses of members of the Department, obtain information from the Department of Motor Vehicles, identify the command to which a police vehicle is assigned, and obtain all records of previous allegations against the subject officers and any relevant logs regarding them. Following this preliminary investigation, the Command Center officer enters the log into the IXLO system.[5] Subsequently the log is reviewed by IAB, classified, and assigned to the appropriate investigative group.[6] Additionally, copies of all logs involving criminal allegations, allegations of police impersonation, and log updates ("Add-Ons") are provided on a daily basis to local prosecutors with jurisdiction over the alleged conduct. The Commission receives these logs on a daily basis as well as all other logs involving less serious allegations of misconduct. IAB conducts quarterly audits to ensure that prosecutors are receiving these logs in a timely and complete fashion.

Given the important role that the logs play, the logs must be accurate and must contain as many details as possible about the caller's allegation. Also, because of the possibility that a caller may have second thoughts, lose interest, become discouraged, wish to remain anonymous, or simply vanish, Command Center officers must treat every telephone call as if it presents their sole opportunity to gather information from the caller. When a Command Center officer fails to

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5. The IXLO system is a database maintained by IAB which, among other information, contains records of past and pending internal investigations of members of the Department. There is also a PRIDE database, which is currently being field tested, designed to maintain the same information as well as personnel and background information about members of the Department presently stored in a variety of separate databases. Thus, the PRIDE system is intended to provide a single means of accessing many different types of departmental records and will replace other redundant databases. See infra at p. 51.

6. IAB categorizes each allegation of corruption or misconduct as either a "C" case or an "M" case. A "C" case involves corruption or serious misconduct, and an "M" case involves less serious allegations of misconduct. In addition, minor infractions or violations of Department regulations are classified as "OG" and which are referred to the subject officer's command for determination and punishment if appropriate. Also, other logs will receive different designations for record keeping purposes either because they are unrelated to the Department, in which case they are referred to the appropriate agency, or because they involve administrative events, such as the loss of Department property. See infra at p. 10.

elicit the necessary information through appropriate questions, fails to generate a log, or fails to include in the log all pertinent details concerning the allegation, the caller's corruption allegation may be lost forever, or the information passed on to IAB field investigators and prosecutors may be inaccurate or incomplete.

II. BACKGROUND

The Commission to Investigate Allegations of Police Corruption and the Anti-Corruption Procedures of the Police Department ("Mollen Commission") noted in its July 1994 Report ("Mollen Report") that the Internal Affairs Division's ("IAD"[7]) top commanders had testified that the Command Center (then known as the "Action Desk") constituted a ". . . vital component of an effective corruption control system . . ." and agreed that ". . . a poorly operating Action Desk, especially one that did not effectively solicit information from complainants, would be tantamount to 'hindering' and even 'killing' police corruption cases before they began." (Mollen Report at 103.) The Mollen Commission found that, despite the recognized importance of the Action Desk, it ". . . routinely operated in a manner that minimized the receipt of corruption information -- and actually discouraged complainants from providing information." Id.

Specifically, the Mollen Commission found that, despite testimony stating that a critical responsibility of Action Desk officers was to solicit as much information as possible from complainants, especially information on the complainant's name, subject officer's name and nature of the allegation, ". . . in the majority of cases, the Action Desk officer made no effort to

7. In 1993, the Internal Affairs Division was dramatically re-formulated into the Internal Affairs Bureau. This reformulation, among other things, consolidated into one Bureau exclusive responsibility for the investigation of corruption complaints, resulted in the development of personnel regulations to ensure that IAB would receive the most capable investigative staff, and caused a dramatic infusion of resources to obtain state of the art technical equipment to conduct covert investigations.

encourage [Mollen] Commission investigators, who made undercover calls to the Action Desk, to provide even basic information like the complainant's name, the officer's name and precinct, or the type of corruption involved." Id. Moreover, the Mollen Commission found, "[t]he Action Desk officer often spoke in harsh tones that would encourage a caller to hang up," and, "[o]n some occasions, . . . [callers] were put on hold for long periods of time." Id. Ultimately, the Mollen Commission concluded that the Action Desk's poor performance resulted in the routine loss of potentially crucial information on police corruption. Id. at 106.

In March 1996, the Commission to Combat Police Corruption ("Commission") issued its First Annual Report of the Commission ("Annual Report"). Like the Mollen Report, the Commission's Annual Report recognized the critical role that the Command Center serves. The Annual Report underscored that, because the Command Center receives virtually all allegations of police corruption, its effectiveness in receiving and processing corruption allegations requires consideration in assessing the viability of the Department's anti-corruption apparatus. (Annual Report at 54). The Annual Report summarized the Mollen Commission's findings with respect to the poor performance of the Action Desk.

The Annual Report also described an audit undertaken by Commission staff to evaluate the effectiveness of the Action Desk in light of the Mollen Commission's findings. The report concluded that while some improvement had occurred following the Mollen Report, a number of weaknesses persisted. Id.

Specifically, this Commission's Annual Report identified the uneven handling of calls by Action Desk officers, stating that, while some Action Desk officers appeared diligent and courteous, others were abrupt and hostile. The Annual Report also found that, in certain instances, Action Desk officers failed to elicit the identity of callers, expressed skepticism

concerning the merits of callers' complaints, and without explanation put callers on hold for long periods of time. Action Desk officers sometimes also failed to generate logs when it appeared that logs should have been generated and dismissed callers seeking to lodge a complaint by telling them, without explanation, that their allegation was not "an IAB matter."

In response to the Commission's earlier findings, and its own ongoing self-analyses, the Department has taken a number of steps to improve the operations of the Command Center. These have included: enhanced self-monitoring; improved training; the articulation of a policy requiring all complaints within the jurisdiction of the Civilian Complaint Review Board ("CCRB") to be logged; replacing and, in appropriate circumstances, disciplining Command Center personnel; using new recruitment approaches to attract qualified personnel; and relocating the facility to a physical space with a more positive environment.

To assess the current effectiveness of the Command Center and the extent to which the weaknesses identified in the Mollen Report and the Annual Report have been remedied, this Commission has conducted a two-part study of the Command Center, which included analysis of IAB's performance standards, review of tape recorded calls handled by Command Center officers, observation of Command Center officers on duty, review of the Department's own Command Center monitoring program, and analysis of the Command Center's training program. This Report summarizes the Commission's study and its findings, and offers an overall assessment of the effectiveness of the Command Center's receipt of corruption allegations.

The first part of this study involved the analysis of calls made to the Command Center during the late spring and early summer of 1996. As discussed below, this analysis revealed that in too many calls to the Command Center several of the previously identified problems persisted.

When the draft of the results of this study was presented to the Department in July and

August 1997, the Department stated that during the periods shortly before and after the time of the calls analyzed it had taken a number of the steps described above to improve the operations of the Command Center. In light of these comments, and because in connection with the August 9, 1997, incident involving the alleged assault of Abner Louima in the 70th precinct there was a failure to log the initial complaint to the Command Center, the Commission determined to update its study. It did so by reviewing a selection of calls to the Command Center in July 1997.

Based on this analysis the Commission finds that the Command Center operates better than it did in the past, that its internal guidelines and policies for logging complaints and interacting with the public are appropriate, and that its management is committed to achieving a high standard of performance. Nonetheless, despite all these efforts, several of the problems identified in earlier reports and in the 1996 sample continue to persist, although some to a lesser degree. The quality of individual Command Center officers' performance remains uneven. While many calls appear to be handled competently and professionally, other calls are handled in a less effective manner. Command Center officers too often fail to either include critical information in logs, elicit important information, or create an environment conducive for eliciting a complaint of corruption by appearing either argumentative or apathetic.

Following the Louima incident, and after the time period for the Commission's latest sample, the Department introduced a daily review of calls in order to identify problems on an expedited basis. (For additional steps the Department has taken during this time period to improve the performance of the Command Center, see infra at pp. 59-60.) At the conclusion of each shift, a sergeant is responsible for listening to the calls received from the prior shift to ensure all allegations were properly logged. This is a positive step that the Commission endorses. While this step should help alleviate the concerns associated with logging and enable

IAB to identify problems more rapidly, given the persistent nature of problems in the important intake function of the Command Center, the Commission believes that additional actions are appropriate. Among the additional steps which should be undertaken by the Department are: evaluation of how the Command Center is staffed and whether fundamental change of its present staffing through the addition of civilians to the unit is warranted; continue to make intake worksheets, which record all relevant information from the caller, routinely available to the investigating officers[8]; continuation of efforts to train Command Center staff and supervisors; and continuation and expansion of IAB's efforts to recruit highly qualified personnel for assignment to the Command Center.

III. THE COMMAND CENTER'S PERFORMANCE STANDARDS AND POLICIES

In preparing this Report, the Commission requested that IAB provide all manuals, guidelines, memoranda and other written materials, which pertain to the Command Center. In particular, the Commission sought to obtain all documents which set forth procedures and policies to guide Command Center personnel and the internal standards against which the performance of these personnel are measured. While there appears to be no single, concise statement of Command Center standards, IAB provided several memoranda to the Commission, including a seven page Action Desk training guide" See N.Y.C.P.D. - Internal Affairs Bureau Action Desk Training Guide, Appendix A ("Training Guide"); and a "Communications Model

8. The sample Action Desk worksheet provided to the Commission by IAB to assist officers in collecting this information was recently improved after discussion between the Chief of Internal Affairs and Commission staff. While there were spaces on the original form for entering such necessary information as the complainant's name, address and phone numbers; the name, rank, shield/tax numbers, and command of the subject officers; and a "narrative" of the allegations; the form had no place for entering the names of witnesses or other potential complainants; identifying information for vehicles; or the physical descriptions of subject officers. After the Commission advised the Chief of Internal Affairs of our findings, IAB developed a new intake sheet to include these recommendations. See Appendix B. This worksheet is now routinely being provided to case investigators to

for Responding to Action Desk Complaints" ("Communications Model") See infra at p.12. As discussed below, although useful standards can be gleaned from these materials, these standards have not been uniformly absorbed by all the Command Center officers.

Among the standards which are set forth in IAB's various Command Center/Action Desk materials, the Training Guide provides basic information about the "duties and responsibilities" of Action Desk officers. See Appendix A at 1. In this regard, Command Center officers are instructed to answer all calls by stating their name and rank and informing the caller that he or she has reached the Internal Affairs Bureau. Officers are also instructed to "prioritize calls," to handle serious allegations first, and to enter all pertinent information from a caller on an "intake form." Id. In entering this information, officers must "keep in mind the 5 'W's'" (who, what, where, when, why) and obtain, if possible, the subject officer's name, shield and tax numbers, vehicle number, and physical description. Id. The Training Guide also states that logs must be generated for the following types of allegations:

- "C" cases: Corruption, serious misconduct, criminal activity.
- "M" cases: Misconduct, no criminal violations.
- "OG" cases: Minor patrol guide violations or deficiencies with no apparent criminality.
- "D" cases: Corruption involving armed law enforcement, corrections -- Not NYPD.
- "CX" cases: Allegations of an administrative nature involving other agencies, *e.g.* NYC Board of Education employee.
- "File": For statistical purposes only, no corruption.
- "CCRB": FADE allegations (force, abuse of authority, discourtesy, ethnic slur).[9]

See Appendix A, at 3.[10]

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assist them in commencing their investigations.

9. "CCRB" refers to the Civilian Complaint Review Board, which investigates complaints against police officers involving force, abuse of authority, discourtesy or ethnic slurs.

10. Pursuant to IAB Procedure No. 620-01, dated January, 4, 1995, the list of log categories was

The remainder of the Training Guide essentially addresses the processing of allegations received by the Command Center. For example, the Training Guide includes descriptions of the various information "checks" Command Center officers must conduct, if appropriate, before generating a log, such as "ARCS system" checks to identify the command to which a Department vehicle is assigned. See Appendix A, at 1. In addition, the Training Guide provides information concerning the types of incidents which require a "call out" of investigators to the scene of an

incident and also provides guidance on how logs are classified. Id at 2-3 .

A June 11, 1996, memorandum from the Executive Officer of the Investigative Support Division to Command Center Commanding Officers, announcing a quality control monitoring program,[11] sets forth the following policy with respect to interaction with the public:

> It is critical that the public be treated in a courteous and empathetic manner. We must strive to avoid even the appearance that our personnel discourage complaints. We must also assure, by asking the proper follow up questions, the greatest amount of information is gathered.

See Appendix D, ¶ 1.

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supplemented by providing that logs should also be generated to record the following occurrences:

a. Allegation of corruption or serious misconduct against personnel from other city, state and federal agencies.
b. Lost, found or recovered department property.
c. Member of the Service arrested, suspended, or placed on modified assignment.
d. Bribery and Controlled Pad situations.
e. Solicitations.
f. Police Impersonations.
g. Members of the Service involved in Family Offenses as described in P.G. 118-19. See Appendix C.

11. The Quality Control Unit's monitoring program is discussed infra at pp. 54-55.

The Communications Model provides a concise one-page outline of the essential steps in receiving and processing Command Center complaints. Because there are several references to the Communications Model throughout the report, it is reproduced here in its entirety:

NYPD INTERNAL AFFAIRS COMMAND CENTER TRAINING COMMUNICATIONS MODEL FOR RESPONDING TO ACTION DESK COMPLAINTS

MAKING CONTACT	Greeting the person, creating that "first impression" and establishing the proper tone.	"Internal Affairs Bureau, Investigations, [Rank and name], Can I help you?"
ESTABLISHING RAPPORT	Creating a comfortable and safe environment where that person feels they can talk openly.	"Tell me why you called" or "Tell me what happened and I'll file your complaint."
LISTENING TO THE STORY	Letting the complainant tell his/her story, what happened, how they feel about it, etc., without interruption or stopping to clarify.	Free narrative. Emphasis on listening and deciding which questions to ask after they are through.
FOCUSING ON "NOW"	Finding out why the caller is filing this complaint at this time.	"Could you tell me why you called this in today?"
GATHERING IMPORTANT INFORMATION	Using their narrative as a point of departure, gathering as much pertinent information as possible.	Ask questions about: the 5 W's, other witnesses, the chronology, evidence, etc.
CLARIFYING & CORRECTING	Making sure you understand the story, the facts, chronology, etc. and clarify anything in question.	Ask questions about: seeming contradictions and unclear information.
VERIFYING & RECAPPING	Restating what you have heard and give the complainant the opportunity to make changes.	"Sir/Ma'am, so you are telling me that ..... [repeat story and information in caller's words]
CREATING CLOSURE	Attempting to bring the call to a logical and comfortable conclusion.	"Before I go, is there anything else you want to tell me...."
MAKING AN	Analyzing the information	Using your team, available resources, and your

INVESTIGATIVE DECISION	you have gathered and deciding what kind of case/ investigation it is.	best judgment as an investigator.
WRITING THE LOG	Recording the complainant's statement in his/her own words.	Filling out the log with all relevant and specific information.

Certain additional policies regarding the performance of Command Center officers may be found in memoranda issued by IAB supervisors. In regard to the preparation of logs, an October 11, 1994, memorandum states that logs should be generated whenever a caller reports: acts of misconduct, acts of corruption, criminal acts, and "[i]nformation 'that may contain' an element of malfeasance or non-feasance, administrative or criminal against any member of the Criminal Justice system -- even if only inferred." See Appendix E. The memorandum goes on to state that, "[i]n the final analysis[,] especially when in doubt[,] you should prepare a IAB log and leave the main assessments to higher/authorized personnel of this Bureau." Id.

In sum, IAB's Command Center materials contain substantial information about the Center's procedures, such as when to generate a log and how to search for relevant departmental records on computer databases. These materials sufficiently serve to familiarize officers new to the Command Center with the mechanics of processing calls. In addition, basic guidelines for interviewing complainants and collecting essential information from these callers can be gleaned from various IAB materials. However, as the Commission's study has revealed, at least some of this information is apparently not reaching all officers assigned to the Command Center or somehow not being sufficiently impressed upon them.

IV. METHODOLOGY OF THE COMMISSION'S STUDY

This study is based on the Commission's detailed review of a sampling of calls received by the Command Center. The Commission received the 24-hour, four-track tape recordings of

the Command Center public telephone lines for nine randomly selected days between May 1996 and July 1996.[12] After obtaining the tapes, the Commission searched each track of each tape at approximately five to 15 minute intervals in an effort to locate calls from civilian callers on each of the selected days. The Commission listened to approximately 170 civilian calls which were received during the nine days.[13]

Following the Commission's preliminary review of the approximately 170 civilian calls, the Commission selected a sample group of 55 calls for further review and analysis and created a questionnaire for use in assessing each call. A copy of the questionnaire is attached. See Appendix F. Drawing, in part, on the Department's own Communications Model (See supra at p. 12) the questionnaire identified certain Command Center officer conduct which should, and should not, occur in effectively handled calls. For example, tracking the stages identified in the Communications Model, the questionnaire considered, *inter alia*, whether the Command Center officer: (a) identified herself upon answering the phone; (b) permitted the caller to tell her story in the first instance without unnecessary interruption; (c) obtained identifying information concerning the subject officer(s); (d) gathered all other reasonably pertinent information; (e) asked questions about apparent contradictions and/or unclear information; (f) restated and confirmed critical information; and (g) determined why the caller was lodging the complaint at that time, if not otherwise apparent.

In addition, the questionnaire asked specific questions concerning certain previously identified weaknesses in the Department's handling of complaints. For example, in regard to

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12. The days selected were: Thursday, May 16, 1996; Tuesday, May 21, 1996; Thursday, May 30, 1996; Saturday, June 8, 1996; Tuesday, June 11, 1996; Friday, June 21, 1996; Monday, June 24, 1996; Saturday, July 6, 1996; and Tuesday, July 9, 1996.

13. This is not to say, however, that there were not additional calls made by civilians on these days. These 170 calls are merely those that were identified by the Commission's random selection process.

generating logs, the questionnaire asked whether: (a) the Command Center officer failed to generate a log when a log was required; (b) the information in a log corresponded to information elicited in the corresponding call; and, (c) if a log was generated, whether the officer provided the log number to the caller and told the caller to reference the log number in future communication with IAB.

The questionnaire further addressed such issues as whether an interpreter was expeditiously located for callers who needed an interpreter; whether in a call in which corruption or serious misconduct was alleged the Command Center officer inappropriately transferred the call to another agency; whether the officer transferred a call without explaining the reason for the transfer or providing the name and direct telephone number of the organization to which the call was transferred; whether a caller was put on hold and, if so, whether the hold exceeded a period of two minutes; and whether the Command Center officer asked inappropriate questions of the caller, such as questions about the caller's employment status, race, sex, and/or social security number.

Additionally, the questionnaire included inquiries concerning the Commission's subjective impression of the Command Center officer's manner. For example, the questionnaire asked if the Command Center officer: (a) appeared argumentative regarding the legitimacy of the caller's allegation; (b) tried to discourage the caller from making an allegation; and/or (c) appeared uninterested or unconcerned about the allegation. Finally, for each call, the questionnaire asked whether the Command Center officer's overall conduct was (a) professional or unprofessional; (b) courteous or discourteous; (c) patient or abrupt; and (d) whether the officer created an environment where a civilian complainant would feel comfortable lodging an

allegation of police corruption. The process of reviewing the sample group of 55 calls against the questionnaire began in October 1996.

Of the 55 civilian calls selected for further analysis and review, 20 calls were ill suited for inclusion in the Commission's study. Fifteen of these 20 calls involved "chronic" callers (*i.e.* individuals who appear to be emotionally unstable who call the Command Center with no understandable or rational allegation) and five calls involved short "inquiry" calls in which callers either sought to continue a prior discussion with a particular officer or leave a message. These chronic calls and short inquiry calls were not evaluated because they provided an insufficient basis for assessing the answering officer's performance.[14]

As discussed above, both because of a desire to determine whether post summer of 1996 steps by the Department would materially affect the Commission's findings and because it was learned that the initial report to the Command Center of the Louima incident was not logged, the Commission also reviewed a sample of recorded Command Center civilian calls made in July 1997. The sample consisted of 30 randomly selected calls from July 1997. The sample was designed to include a call from nearly each day of the month as well as a broad range of tours and Command Center personnel. Thus, while neither the 1996 nor the 1997 samples were "scientific" samples, given the fact that the Command Center receives approximately 19,000 calls a year, the Commission believes that they were sufficiently broad to be able to evaluate the Center's overall performance, particularly since, as discussed below, the Department's own quality reviews have identified similar problems.

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14. The Commission's general observations concerning the Command Center's treatment of "chronic" callers is discussed infra at p. 50.

V. ANALYSIS

As discussed above, improvements have been made in the operations of the Command Center since the release of earlier studies and the Commission's 1996 sample. Despite these improvements, problems of apathetic or argumentative behavior, inadequate questioning, and incomplete logging still appear too often. This section analyzes these ongoing problems.

A. Illustrative Calls

From its sample of 55 calls from 1996, the Commission identified two calls which provide illustrations of these basic problems. From its sample of 30 calls from 1997, the Commission identified a third illustrative call. In addition, for purposes of illustration, the following call from 1996 provides an example of effective interaction with a caller.[15]

1. Call Number 1 (May 30, 1996; 1:17 a.m.) - - The Command Center Working Effectively

Summary of Call:

The caller told Command Center Officer A[16] that she took a cab from the Lower East Side to Harlem after she and the driver had agreed upon a fare of $12.50.[17] The caller gave the driver some of the amount due, but had to stop at a store to obtain change so that she could pay the balance. When she came out of the store, two police officers approached her, handcuffed her, twisted her arm, and "badgered" her.

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15. Each of these illustrative calls are also included in the "General Analysis" discussion below. See infra at p. 30, *et seq*.

16. Command Center Officer A retains his current assignment.

17. In the interest of preserving confidentiality, throughout this report the Commission has withheld the names of officers and callers and mixed its use of masculine and feminine pronouns so that they do not necessarily correspond to the sex of the actual individuals referred to.

Following the caller's disclosure of these events, Command Center Officer A asked the caller several questions. Among other clarifications, Officer A asked what the caller meant by "badgering." The caller explained that the police officers told her that she was under arrest and pushed her around, twisting her arm. Officer A then asked whether the subject officers took her to the precinct and the caller responded that they did not.

The caller told Command Center Officer A that she did not get the subject officers' badge numbers. Officer A then attempted to ascertain what precinct the officers were assigned to by finding out the exact location of the incident. Officer A also requested a detailed physical description from the caller of each of the two officers. The caller provided several facts concerning the two officers (*i.e.* race, approximate height and age, description of hair), but Officer A asked follow-up questions to obtain even more detailed information. For example, when the caller said that one of the subject officers was 30 or 40 years old, the Command Center officer asked, "Do you think it was 30 or 40?" At that point, the caller said that the age was probably 40. Officer A restated all of the information the caller had provided and asked additional questions designed to elicit further descriptions of the two subject officers. For example, he asked about facial hair and whether the subject officers were "slim."

Officer A then requested the caller's name and complete address, repeating the information as she provided it. After asking the caller to hold for a minute so that he could obtain a log number, the Command Center officer returned to the line in less than a minute. The caller reiterated her anger and frustration with respect to the incident, and stated that the subject officers could have broken her arm. Officer A did not interrupt her, but simply waited for her to finish. Then, the Command Center officer provided the caller with a log number, which he repeated to insure that the caller had heard the number correctly. The caller asked what was

going to happen, given that she did not know the name or badge number of the subject officers. Officer A explained that the complaint would be investigated and that the investigators would try to identify the officers involved based on the information that was provided.

Finally, Command Center Officer A again provided the caller with his name and spelled it for her, told her again that someone would be contacting her and, when the caller asked if she could call back if she was rearrested, told her that she could call the Command Center anytime.

Analysis:

· Atmosphere Conducive To Reporting

Here, the Command Center officer was respectful and professional at all times. The officer was patient, allowed the caller to tell her story at the outset without interruption, and did not cut her off when she repeated herself or expressed anger. Moreover, at no time did Command Center Officer A express doubt about the caller's allegations and his questions did not convey the sense that he was challenging her story in a hostile manner.

· Efforts To Obtain Critical Details

Officer A clearly recognized the importance of ascertaining the identity of the subject officers. Accordingly, Officer A probed the caller's descriptions of the two officers and, in doing so, insured that he had obtained all possible information about the subject officers. The Command Center officer also asked for clarification of other information which was not clear initially.

· Concerned Reaction To Conduct Alleged

At no time did Officer A suggest that the conduct of the subject officers was not objectionable or that it did not merit a formal complaint. Rather, Officer A conveyed the impression that he took the caller's allegation seriously and that he needed to obtain as many

details as possible. Further, Officer A displayed no reluctance to generate a log and made sure that the caller received the log number accurately.

· Use of Basic Interviewing Techniques

Perhaps most basic to Officer A's successful handling of the call was the Command Center officer's effective interview of the caller and ability to elicit pertinent information. In this regard, Officer A first listened to the caller without interrupting and then asked appropriate follow-up questions to clarify the caller's information. Later in the call, Officer A confirmed critical information by repeating it to the caller and afforded her an opportunity to clarify or correct details. By structuring the conversation in this way, Officer A ensured that the information provided by the caller was as complete as possible and that the log for the call accurately memorialized the caller's allegations.

The importance of the techniques employed by Officer A are underscored by consideration of the remaining three illustrative calls. In two of these calls, Command Center officers failed to employ similar skill or patience. As a result, the calls exemplify various things that officers should avoid doing when receiving complaints or, conversely, things that should have been done but were missed.

2. Call Number 2 (June 24, 1996; 1:36 p.m.) - - A Problematic Call

Summary of Call:

Command Center Officer B answered the phone. A male caller stated that a police officer was "putting drugs on other people." The caller stated that the officer had threatened to lock him up even though he had done nothing wrong. Officer B told the caller to "hold on," after stating, "I'm going to take a complaint." Officer B put the caller on hold.

Command Center Officer C[18] then picked up the line and stated "Internal Affairs, Detective [C]." The caller restated his allegations, and in response to questions by Officer C stated that while he had not personally observed the officer putting drugs on people, he had been told by others that this happened. Officer C told the caller that nothing could be done because the officer he was complaining about had not done anything improper yet and the Command Center did not take preemptive complaints. Officer C then advised the caller that harassment claims should be made to CCRB. Officer C's tone of voice indicated that she was not interested in hearing the caller's complaint and that, in any event, she did not believe the caller. In this regard, Officer C argued with the caller, making statements like, "Have you witnessed this?", "You actually wouldn't know that for a fact," and "That's an assumption you're making." She also told the caller, "Someone telling you they can lock you up, that's not a threat. He can't lock you up for no reason." From such language, Officer C's lack of interest was clearly conveyed to the caller who, when asked for proof of his allegation, replied, "I couldn't prove it to you for a fact because you wouldn't want to believe that."

Indeed, at one point Officer C even laughed at the caller, despite his insistence that the police officer was "running around threatening people" and "putting drugs on people." Officer C eventually asked the caller for the police officer's name, which the caller provided, adding, "He's really a gangster with a badge." The Command Center officer, however, responded with an apathetic "Mmm, hmmm." Eventually, the Command Center officer told the caller to hold on and put him on hold. Soon afterward, the call abruptly ended. It is unclear how or why the call ended.

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18. IAB informed the Commission that Command Center Officer C has received training subsequent to her receipt of this call, that her performance has been monitored, and that her current overall performance is good. Thus, she retains her current assignment.

Analysis:

This call illustrates the following serious problems which undermine the effectiveness of the Command Center:

· Failure To Obtain Critical Information From Callers

Officer C never obtained any information concerning the caller's name, identity, or phone number. Indeed, despite the caller's clear allegation that the subject officer was planting drugs on innocent individuals and his description of the subject officer as a "gangster with a badge," Officer C was plainly reluctant to accept a complaint at all.[19] Although at one point Officer C asked for the subject officer's name, she failed to ask any questions designed to elicit information concerning the circumstances of the conduct alleged or possible witnesses. See Communications Model supra at p. 12 (instructing that the Command Center officer should use the caller's "narrative as a point of departure, gathering as much pertinent information as possible" and should ask questions about other witnesses, the location and chronology of events, evidence, etc.).

· Hostility and Skepticism Expressed By Officer

From the outset of the call, Officer C's harsh, abrupt tone expressed her skepticism about the caller's allegations, a message underscored when Officer C laughed at one of the caller's statements. This attitude was not lost on the caller, who eventually remarked that Officer C simply did not want to believe him. Officer C's skepticism and refusal to credit any of the caller's allegations does not comport with IAB's standards for handling complaints. See

19. While a log was not generated here, as one should have been, the Command Center officer, based on a name check of the subject officer, did update an IAB log received approximately three weeks earlier involving the same named officer. Consequently, the substance of the allegation was preserved. However, the update characterizes the caller as anonymous when in fact the operator never attempted to obtain the caller's name, address or telephone number thus limiting the investigating officer's ability to pursue these allegations.

Communications Model supra at p. 12 (providing that a Command Center officer should "establish [a] rapport" in which the officer focuses on "[c]reating a comfortable and safe environment where that caller feels they can talk openly").

· Apathy Concerning Alleged Misconduct

Officer's C's tone indicated a lack of interest in the caller's allegations. Also, like a number of other Command Center officers in the calls reviewed, Officer C's handling of the call indicates that the Command Center officer believed that the decision to generate a log was discretionary. Here, Officer C was reluctant to take the caller's complaint because he could not "prove" his allegation that the subject officer was planting evidence and because the subject officer had not carried out his threats to the caller. In fact, according to IAB's guidelines, Officer C was required to generate a log because the caller's allegations involved potential corruption or misconduct. See Training Guide supra at p. 10.

· Failure to Create An Environment Conducive To Reporting

Officer B answered the call, heard the caller's general complaint, and then passed the call to Officer C after telling the caller that a complaint would be taken. Neither Command Center officer provided an explanation to the caller for the transfer. Although in this instance the "pass off" of the call from one Command Center officer to another occurred before the caller provided a complete account of his allegation, in other calls reviewed by the Commission the "pass off" required a caller to repeat a detailed account, causing obvious frustration and annoyance for the caller, and potential loss of valuable information.

· Failure to Use Basic Interviewing Techniques

At no time did Officer C simply permit the caller to tell his story. Rather, each time the caller spoke, Officer C interrupted him with a question or comment that appeared intended to

challenge the caller's rendition of events and convince the caller that his allegation was unfounded or premature. The Department's standards recognize the importance of permitting callers to set forth, in the first instance, their allegations. See Communications Model supra at p. 12 (advising that after greeting a caller and inviting the caller to explain his or her reason for calling, the officer should let "the complainant tell his/her story, what happened, how they feel about it, etc., without interruption or stopping to clarify"). According to the Communications Model, this phase of the call is a time for "free narrative" during which the officer should focus on "listening and deciding which questions to ask after [the callers] are through." Id.

Despite the Command Center officer's interruptions, the caller persisted in making his complaint. Unfortunately, Officer C did not attempt to confirm her understanding of the information provided by the caller even after it became obvious that he was alleging corruption or serious misconduct by a member of the Department. See Communications Model supra at p. 13 (advising a Command Center officer to restate "what you have heard and give the complainant the opportunity to make changes"). Restatement of the caller's allegations by the Command Center officer might have helped overcome some of the communication problems that characterized the rest of Officer C's interaction with the caller.

3. Call Number 3 (July 9, 1996; 2:44 p.m.) - - A Hostile Response

Summary of Call:

A male caller told Officer D[20] that, upon the caller's arrest, police officers took $780, his beeper, and a phone card and did not voucher this property. The caller also stated that after his arrest the officers "ripped apart" his van looking for drugs and beat up a friend who went to look at the van.

20. Subsequent to the 1996 sample period, and prior to this report, IAB identified this Command Center

Officer D challenged the caller's accounts concerning both the property and the van. For example, Officer D told the caller, "You've got to be honest with me, though. There was no reason for them to do what they did?" Despite the caller's statements that a member of the service took $780 and did not provide a voucher, Officer D also stated, "They stole your money? They took your money? What are you saying to me?" The Command Center officer then opined, "I find it hard to believe that they count the money in front of the desk sergeant and then they steal it on you. It's not rational."

The Command Center officer asked if the caller checked for the money at the precinct, and the caller advised Officer D that he is scared to go there. Officer D responded, "What are you scared of?" The caller claimed that several police officers in the precinct beat up his friend when the friend went to look at the van. Officer D stated, "You're giving me sketchy information." The caller, incredulous, repeated that his friend was beaten up. Officer D asked, "Why did they beat him up? For no reason?" He then remarked, "We got a bad police department if that's what really happened." At no point did Officer D seek any information concerning the identity of the friend or the circumstances surrounding the alleged beating.

Eventually, Officer D told the caller, "I'm going to take a complaint that the police didn't give you a receipt for your stuff." At that point, Officer D obtained the caller's phone number and address and asked for the names and shield numbers of the subject officers. Officer D did not give a log number to the caller. Rather, he told the caller that he would call the precinct to find out whether a voucher was made for the caller's property and that he would call the complainant back with the log number.[21]

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officer as being ill suited for this assignment and transferred him in November 1996.

21. Officer D then used one of the Command Center's tape-recorded lines to make the call to the precinct's property clerk. However, the property clerk was not available and when the Command Center officer called the

The log generated by Officer D for this call omitted any mention of the allegations concerning the destruction of the van and the beating of the caller's friend.

Analysis:

This call highlights certain problems also evident in Call Number 2.

· Failure to Obtain Critical Information from Callers

As in a number of the calls reviewed in which the Command Center officer appeared to doubt the caller's allegations, the Command Center officer failed to obtain critical information. Here, for example, Officer D failed to obtain any identifying information concerning the caller's friend and failed to ask pertinent questions about the alleged destruction of the van. Further, Officer D's questions discouraged the caller from lodging a complaint rather than serving as a means to obtain details to clarify the complaint or generate a log.

· Hostility and Skepticism Expressed By Command Center Officers

Again, like Officer C in Call Number 2, from the outset of this call, Officer D expressed doubt about the caller's rendition of events. Indeed, Officer D expressly advised the caller that he found it "hard to believe" that the conduct the caller alleged had actually occurred. Obviously, these types of comments are hardly conducive to eliciting information.

· Failure to Include All Pertinent Information in Log

Despite Officer D's attitude, he agreed to "take a report" of the caller's property allegations but ignored the other allegations. Thus, despite the caller's clear statements concerning the destruction of the van and the beating of his friend, Officer D failed to include these allegations in the log. Officer D's dismissal of these allegations apparently reflected his view that the caller could not be believed because the purported conduct was not "rational" and

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complainant back he reached an answering machine and hung up without leaving a message.

"we got a bad police department" if the allegations were true.

In addition, Officer D ended the call without providing the caller with the log number. Although Officer D's efforts to reach the property clerk were reasonable, the Command Center officer should have, before terminating the call, provided the caller with the log number and instructed the caller to reference the number in future communication with the Command Center about his complaint.

· Failure to Use Basic Interviewing Techniques

The most basic problem with this call is that few, if any, of Officer D's questions and statements were phrased to elicit information from the caller. Instead, the questions were designed to pointedly challenge the veracity of the caller and to convey the officer's disbelief and impatience. The Command Center officer also failed to verify his understanding of the caller's allegations. If the officer had summarized his understanding of the allegations at the end of the call, the caller would have had an opportunity to point out that he was ignoring the allegations of the beating and the damage to the van. This may have resulted in the allegations being included in the log.

4. Call Number 4 (July 24, 1997; 8:09 p.m.) - - A Problematic Call

Summary of Call:

A caller alleged that a Detective had been rude to her and her father and had lied to both of them in gaining entrance to their home and in attempting to bring her brother in for questioning related to a robbery complaint against him and a second brother. Command Center Officer E[22] interrupted her frequently as she related her complaint, saying at one point, ". . . I don't need to hear a whole entire thing . . ."

22. This call was recently brought to the attention of IAB. IAB informed the Commission that Command

The Command Center Officer repeatedly told the caller that Detectives are allowed to lie in pursuing an investigation and seeking suspects. At one point the Command Center officer said, ". . . He can lie to get his way into your house. . . Detectives can lie when they're investigating a case . . ."[23] Although the Command Center Officer admonished the caller by stating, ". . . You're trying to get involved in Police Department procedure, which you know nothing about. . . ," he also stated, ". . . I'm not going to tell you what we do and what we're not supposed to do. . ."

The caller began to expand on her complaint and suggested that the individual who made out the original complaint against her brother - - a former police officer who was terminated from the Department for narcotics abuse and may have had a prior relationship with the subject officer - - had waited two weeks to make his complaint specifically so that the subject Detective could return from vacation to investigate it himself. In response, the Command Center Officer cut her off, telling her, "I can't put this in the log." He even asked incredulously, "What is it you're talking about?"

Analysis:

This call highlights the following problems:

· <u>Apathy Concerning Conduct Alleged</u>

The Command Center Officer clearly conveyed a message that he did not believe that the Detective had engaged in any type of misconduct. Rather than impartially taking down the complaint, he attempted to justify the Detective's actions. Furthermore, he demeaned the caller

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Center Officer E will receive additional training to address the concerns raised herein.

23. While under limited circumstances investigating officers may use deceit in furtherance of an investigation, the Command Centers officer's repeated statements about the propriety of Detectives lying were inappropriate for the reasons discussed below.

for what he perceived as her ignorance of NYPD procedures, then refused to engage in a discussion as to the nature of those procedures.

· Failure to Obtain Critical Information

When the caller moved away from her account of the Detective's visit to her home, and began to suggest that the [robbery] complainant might be receiving favorable treatment from the Detective because of their prior relationship, the Command Center Officer protested that this information was unworthy of his attention and declined to explore it with her at all. Thus a potentially valuable insight into the allegation may have been lost.

· Failure to Create an Environment Conducive to Reporting

The Command Center Officer was argumentative and interrupted the caller frequently. His repeated statements that Detectives can justifiably lie in furtherance of an investigation, while true in some circumstances, were plainly overstated here. Rather than respectfully explaining that Detectives may have to utilize deceit in certain circumstances, the Command Center officer's abrupt and argumentative approach appeared to be a reflexive justification of the police action complained of, an image IAB takes strides not to portray. Rather than creating an environment where the caller would feel comfortable to make an allegation of police misconduct, the Command Center officer's tone effectively dismissed the genuine concerns of a caller who believed that she and her family members had been subjected to an abuse of police authority. Indeed, the change in the caller's tone of voice -- from angry and upset initially to docile and accepting -- indicated that she was cowed by the Command Center Officer's statements.

5. Conclusions:

As the illustrative calls demonstrate, the differences between a call which is handled professionally and effectively and calls which do little to advance the Department's anti-corruption efforts or foster goodwill with the public are striking. Yet, at the same time, the qualities which made the first illustrative call effective are fundamental. To accomplish most of the Command Center's goals most simply, Command Center officers need to listen to the caller, exercise some patience, demonstrate interest in the caller's allegations, ask appropriate questions, and collect basic information.

B. General Analysis

As previously noted, from the initial pool of approximately 170 identified calls from civilian callers in 1996, the Commission identified 35 for further review. Thirty additional calls were selected from July 1997 to determine whether the problems observed in the 1996 sample were remedied. Each of these 65 calls were reviewed in detail and evaluated according to criteria set forth in a questionnaire (See Appendix F). In the preceding section, three of the calls were discussed in detail because they illustrate fundamental recurring problems identified by the Commission. Further consideration of the 65 calls based on the criteria set forth in the Commission's questionnaire provides additional insight into the overall effectiveness of the Command Center. Discussed in further detail below, these criteria include:

- Efforts to obtain information to identify the subject officer.
- Efforts to obtain identifying information about the caller.
- Preparation of logs.
- Appropriate attitude and manner toward callers.
- Efforts to gather all reasonably pertinent information.
- Handling language barriers.

- Restating critical information.
- Allowing callers an opportunity at the outset to tell their stories without interruption.
- Clarifying apparent contradictions or unclear information.
- Handling call transfers properly.
- Avoiding inappropriate questions.
- Placing callers on hold with an appropriate introduction and for a reasonable length of time.
- Proper self-identification by Command Center officers.
- Efforts to determine callers' reasons for calling at the present time.

1. Efforts to Obtain Information to Identify the Subject Officer

The importance of obtaining information to identify the subject officer is obvious. The more information a Command Center officer elicits from a caller concerning the identity of the subject officer, the more likely it is that a meaningful investigation will follow. Accordingly, one of the most important and basic tasks of a Command Center officer is to obtain as much information as possible concerning the subject officer.

Summer of 1996 Sample

Of the 35 calls in the 1996 sample, 20 calls involved allegations about specific police officers in which the caller did not volunteer the officer's name. In six of these 20 calls, Command Center officers failed to request the names of the subject officers. In the same six calls, Command Center officers also failed to ask if the callers could provide the subject officers'

shield numbers or a description of their physical appearance.[24] As a result, no identifying information about the subject officers in these six calls was obtained from the callers.

In an additional four calls, the callers provided the names of the subject officers but were not questioned as to whether they had knowledge of the officers' shield numbers.

Finally, in three of these same four calls in which a name was provided but a shield number was not obtained, the Command Center officers also did not obtain a physical description of the subject officers.[25] Command Center officers did not obtain physical descriptions of the subject officers from the caller in two other calls as well, although other identifying information was obtained in these last two calls.

Thus, out of the 35 calls reviewed by the Commission from the 1996 sample, there were a total of twelve calls in which the Command Center officers did not attempt to obtain sufficient information regarding the subject officers. Many of these calls shared multiple deficiencies. The prevalence of instances in which Command Center officers did not seek identifying information about subject officers if it was not volunteered by the callers is particularly troubling because this information is the most basic component of a complaint.

In response to the Commission's findings, IAB maintained that once a subject officer's name and precinct are ascertained, it becomes less important to continue questioning a caller for additional identifying information such as shield numbers or physical descriptions. IAB

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24. In evaluating the calls, the Commission questionnaire provided the option of "not applicable" in appropriate instances. For example, if a caller volunteered the name of a subject officer, there plainly was no reason for the Command Center officer who handled the call to request the name. Accordingly, in such a situation the officer would not be evaluated on the question of whether she requested the subject officer's name and "not applicable" would be noted instead. In this way, officers were only faulted for failing to collect information or other errors where they clearly did not do something that should have been done, or vice versa.

25. Although, as noted, in these three calls the Command Center officers did obtain the subject officers' names, a physical description should also be obtained to ensure that the caller is identifying the correct officer and because several officers can have the same name.

asserted, however, that when the name of the subject officers is not known, these avenues of inquiry are necessary.

Summer of 1997 Sample

This problem continued to persist in the 1997 sample, but not quite to the same extent as the sample from 1996. Of the 30 calls in the 1997 sample, there were 24 calls in which allegations were made against police officers who were not all identified by name. Eight of these 24 callers were not asked for key identifying information on the subject officers who were not named. In five of these calls the name was not requested. Typical among these was a call in which a complainant offered a badge number he claimed to have obtained from one of the officers who had mistreated him. Because the number consisted of six digits -- whereas NYPD badge numbers typically contain only four or five -- the Command Center officer apparently did not believe this number was correct. However, rather than inquiring further about the subject officer's description, the operator simply dropped this line of questioning.

2. Efforts to Obtain Identifying Information About the Caller

Equally basic to complaint intake is the need to obtain callers' names, addresses, and phone numbers. Without this information, field investigators may be unable to locate and interview a complainant and the caller's allegation may never be adequately investigated.

Summer of 1996 Sample

Of the 35 calls, 13 calls involved callers who identified themselves by name. Of the remaining 22 calls, Command Center officers in 17 instances asked the caller his or her name and officers in five instances failed to obtain this information at all. The 1996 sample did not include any calls in which callers indicated a preference to remain anonymous. The 1997 sample, however, did include one call in which a caller requested anonymity. Here, the

Command Center operator failed to give the caller adequate assurances that his request for confidentiality would be preserved.

In the same five calls, Command Center officers also failed to obtain the callers' addresses. Command Center officers failed to request address information in three other calls as well. In the remaining 27 calls, callers either volunteered their addresses or Command Center officers affirmatively sought this information.

Finally, in seven of the eight calls in which Command Center officers failed to obtain callers' names and/or addresses, the officers also failed to obtain the callers' phone numbers. Of the remaining 28 calls, callers either volunteered their phone numbers or, if a number was not volunteered, Command Center officers asked callers to provide a number.

Summer of 1997 Sample

The 1997 sample showed meaningful improvement in this area. In the recent sample there were 26 calls in which the caller did not initially provide full identifying information (including their: name, address, and phone number). The operator asked for this information in all but one call.

3. Logs

a. Failure to Log

For the purposes of this study, the Commission noted in its survey that a Command Center officer failed to generate a log when one was required if the officer did not make a log when an allegation plainly involved potential police misconduct or corruption, consistent with the standards set forth in IAB's written materials. These standards provide that logs must be generated whenever possible "acts of misconduct," "acts of corruption," or "criminal acts" are reported, including occasions when information may contain "an element of malfeasance or non-

feasance, administrative or Criminal against any member of the Criminal Justice system -- even if only inferred." See October 11, 1994, IAB Memorandum, Appendix E. Nothing in IAB's standards suggests that Command Center officers have discretion to forego generating a log if they do not believe a caller's allegations. Rather, the apparent and proper policy is that all complaints which on their face fit one or another of the various categories for generating a log should result in a log. Given the primary intake function of the Command Center and the very limited inquiries that officers can make over the phone, evaluation of the merits of an allegation should be left until later.

Summer of 1996 Sample

In 16 of the 35 calls from the 1996 sample, Command Center officers generated logs. In 13 additional calls, a log was required but not generated.[26] Of these 13 calls, four related to calls transferred to the CCRB and, as discussed below, in these circumstances there was some confusion about the necessity of logging CCRB referrals until IAB issued a clear rule in February 1997. (See infra at pp. 36-37.) An example of a non-CCRB call where there erroneously was no log generated involved a caller who alleged that his girlfriend had a "police boyfriend" who put an illegal tap on his phone. The Command Center officer interrupted the caller to remark that "it can't be done. You need a judge for that." Without generating a log or requesting any further information, the Command Center officer told the caller to go to the

26. Twelve of these 13 calls involved allegations against members of the Department. The remaining call involved an allegation against a law enforcement officer not employed by the Department. The Commission determined that logs were not generated for these calls not only from the fact that no log numbers were provided to the callers but also by reviewing all of the logs generated for the days on which the calls were made. These checks revealed no logs containing information consistent with the information provided in the calls.

It should be noted that the Commission concluded that the six remaining calls did not require logs because they did not involve allegations of corruption or misconduct by members of the Department or were attempts to update previously logged complaints.

precinct and fill out a complaint. This call should have resulted in a log because the caller clearly alleged potential misconduct by a police officer.

The other non-CCRB instances found in the Commission's survey involving members of the Department which should have resulted in a log, but did not, involved Illustrative Call #2 (where the caller claimed an officer is planting drugs on other people and acting as a "gangster with a badge"); Illustrative Call #3 (where the log omitted allegations of assault and destruction of property); an allegation that a police officer drinks for several hours at a bar immediately before going on duty (the Command Center officer astoundingly responded, "I don't understand what's wrong with that. . . . We have nothing against that."[27]); allegations of an unauthorized search of the vacant apartment of the caller's missing brother[28]; and allegations of unlawful detainment of the caller's daughter by an officer who may reside in New Jersey.[29]

Although a complaint which is properly referred to CCRB would be investigated by CCRB, an IAB log for the referral is necessary to document the complaint and referral.[30] The Commission believes that the failure to generate logs during the 1996 sample period was, despite reasonably clear IAB standards on this point, largely attributable to confusion among Command

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27. This Command Center Officer, who also handled Illustrative Call Number 3, was transferred from the Command Center. See note 20, supra at p. 24. Additionally, after the Commission brought this unlogged call to the attention of IAB, the call was reviewed, cross referenced with a prior log with a similar allegation involving the same officer, and a new log was generated.

28. As later events revealed, this call was related to a high-profile murder involving allegations which IAB had received and logged three days earlier and which formed the basis for an extensive IAB investigation. While the call described above, in and of itself, probably would not have resulted in an IAB investigation or had any direct relevance to the murder investigation, it does demonstrate that the full implications of a call may not be apparent at the time it is received and officers should err on the side of generating a record for all calls they receive.

29. These unlogged calls have previously been brought to the attention of IAB. Follow-up measures were taken to preserve the allegations and commence investigations where appropriate.

30. Moreover, IAB policy provides that allegations of excessive force resulting in serious injury should be independently investigated by IAB, regardless of CCRB's involvement. With this policy, it becomes all the more important that CCRB referrals are memorialized to ensure that IAB identifies those force cases in which it should conduct its own inquiries.

Center personnel about when a log was required and a previously superseded policy which permitted the transfer of CCRB complaints.

Indeed, subsequent to the 1996 sample period, the IAB Quality Control Unit, which has performed self-inspections of the Command Center, identified that some Command Center officers were not complying with IAB standards which require that a log be generated for all complaints which fall within the jurisdiction of the CCRB. See Quality Control Unit, infra at p. 54. As a result, on February 11, 1997, a directive was issued by the Commanding Officer of the Action Desk. It states in pertinent part, "Under no circumstances will a caller be transferred to CCRB to file a complaint! All CCRB complaints will be taken and assigned a log number by Action Desk personnel." (emphasis in original.)

Summer of 1997 Sample

The 1997 sample showed meaningful improvement with regard to the failure to log complaints. In only one call was a required log not created. That case involved a complaint of harassment and improper police action when an officer stopped his [the officer's] car while transporting prisoners in order to question his wife and the male complainant who were riding together in another car. The Command Center officer who took the call questioned the legitimacy of the complaint and directed the caller to file it instead with the CCRB. No log was taken.

b. **Incomplete Logs**

Summer of 1996 Sample

The Commission's review of the 1996 sample also revealed that in three of the 16 calls in which Command Center officers generated logs, the logs omitted allegations of corruption or

misconduct made by the caller.[31]

Summer of 1997 Sample

The problem of incomplete logs continued in the 1997 sample. In 5 cases, a core allegation was not included in the log, an omission which could affect the classification of the complaint, the manner in which it is investigated, and whether the local prosecutor or the Commission choose to monitor the matter. Thus, for example, the log of a complaint about how a woman had been treated when she inquired at a police station about her arrested son left out the assertion that her son's teeth had been "knocked out" by the police. And in another case, the allegation that the police were working with drug dealers was omitted from the log.[32]

In 7 additional cases, crucial information given by the caller pertaining to the complaint was omitted from the log. This information included names of witnesses to the events in question, descriptions of subject officers and, in one case, the existence of a videotape in the caller's possession that purported to show officers engaged in the conduct being complained about.

Obviously the failure to include core allegations in a log is troublesome. The failure to include an allegation may result in the case being misclassified by IAB and improperly referred to an investigative unit outside of IAB. When and if the misclassification is discovered, evidence may have disappeared and other investigative leads gone cold. Moreover, the contents of the log needs to be complete because this information is provided to prosecutors and the Commission who monitor these allegations.

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31. See Illustrative Call Number 3, supra at p. 24.

32. This omission likely resulted from the fact that the person preparing the log had not received the call. This was the only instance in either sample when this occurred.

In discussions with IAB concerning defects in logs (other than where the central allegation was omitted), they expressed the view that every details of a complaint was not intended to be included in the log and pointed out that the log was supposed to be only a brief summary of the call and that investigators had access to the original tapes. While the Commission has not undertaken a formal review to determine in what percentage of the cases investigators actually listened to the tapes, anecdotal information available to the Commission indicates that historically the tapes were not systematically and promptly made available to investigators. IAB, in response to the Commission's concerns, is taking steps routinely to provide case investigators with a copy of the Command Center tape and IAB's Quality Control Unit will be verifying that copies of such tapes exist in the investigative folders and that investigators reviewed the tapes.

4. Attitude and Manner of Command Center Officers

Summer of 1996 Sample

In six calls in the 1996 sample involving four different Command Center officers, the officers appeared openly argumentative concerning the legitimacy of the complaint. For example, one caller alleged that officers had taken jewelry from the trunk of his car. The Command Center officer who handled the call disputed the claim by telling the caller, "I don't know many people who leave jewelry in the car and allege the cops stole it." In another call, the Command Center officer repeatedly interrupted the caller saying, "You're assuming" and asking, "What's your complaint?" when the complaint was quite obvious.

In four of these six calls (two of which were handled by the same Command Center officer), the officers were not only argumentative but expressly discouraged the callers from lodging complaints. For example, in one call, in which a caller alleged that police officers

searched his brother's apartment for no apparent reason and may have been involved in his brother's earlier disappearance, the Command Center officer told the caller that his allegations were too vague and advised the caller, "I don't feel it's misconduct." The Command Center officer told the caller to call back if he had more to report. In two additional calls, the officers were not openly argumentative but nonetheless discouraged the callers from reporting their allegations.

In 14 of the 35 calls, handled by eight different Command Center officers, the officers appeared uninterested about the conduct alleged.[33] While this category depends to some extent on the subjective impressions of the Commission staff, the staff found that an officer appeared uninterested only when such an attitude was plainly obvious. See Illustrative Call Number 2, supra at p. 20.

Summer of 1997 Sample

Problems identified in this area were still present in the 1997 sample. Operators in six of the 30 calls were openly argumentative. In one case, a caller hung up out of frustration, before being able to give the necessary data for a log, after the operator had told him, in response to his complaint, "There's something wrong with this picture,"[34] and insisted the caller was not telling him the full story. In another case, the caller was discouraged from filing a complaint by an operator who told her, "We investigate high, intense investigations," and suggested that she take her complaint to the CCRB instead. In another call, the Command Center officer's response appeared to be justifying the alleged misconduct of the police. See Illustrative Call Number 4,

33. In six of these 14 calls from the 1996 sample in which Command Center officers were uninterested, the officers were also openly argumentative or discouraging. In terms of the attitude conveyed to callers, some officers managed to shift between being argumentative, discouraging and uninterested in the course of a single conversation.

34. While IAB has contended that such a statement can be an appropriate investigative inquiry, the tone of such a comment can convey an unwillingness to accept a complaint.

supra at p. 27. In one example involving a caller who claimed he was falsely arrested for child abuse by an officer who was retaliating against him, the Command Center officer inquired as to the status of the abuse allegation. The caller stated that the matter was pending in court. The Command Center officer, without determining any of the facts of the case, responded, "Well then there had to be probable cause or else it would have been thrown out." When the complainant maintained that the arrest was baseless and there were no signs of injury to his daughter, the Command Center officer continued to argue with him by stating, "That's what you say...[signs of abuse] might not show up two weeks later."

In four additional calls, the operators, while not openly argumentative, were at best apathetic and uninterested. One operator, for example, failed to respond in any way when a caller became highly emotional and began crying while discussing a traumatic experience. Another operator made almost no effort to reassure a caller who repeatedly expressed concerns for his safety should his anonymity not be maintained.

The Commission also identified instances where callers were interrupted by Command Center officers who seemed more interested in filling out a form than in hearing the caller's complaint. The same operator who is described above as appearing to justify the conduct of the police, cut off a caller, saying, "I don't need to hear a whole entire thing." See Illustrative Call Number 4, supra at p. 27.

One technique which may be useful in overcoming these problems is found in the Communications Model. At the outset of a call, Command Center officers should permit callers to tell their stories without interruption. This is a basic interview technique that insures that the caller will set forth her allegation without being sidetracked or confused by the questioner. In addition, by allowing callers an opportunity to tell their story without interruption, Command

Center officers help create an atmosphere that is conducive to reporting corruption. Recognizing these purposes for affording callers a time for "free narrative," IAB's Communication's Model provides that Command Center personnel should allow callers a reasonable, uninterrupted opportunity to set forth their complaints. See Communications Model, "Listening to the Story," supra at p. 12.

5. Efforts to Gather All Reasonably Pertinent Information

The crux of a Command Center officer's job is obtaining information concerning police corruption and misconduct. By eliciting all pertinent information from a caller, a Command Center officer insures that, even if the caller cannot be located during the investigation of the allegation, the Department possesses sufficient information to pursue the complaint.

Summer of 1996 Sample

In 16 of the 35 calls in the 1996 sample, Command Center officers failed to gather all reasonably pertinent information. The missing information included witness names, full descriptions of the alleged events, and details as to when the events occurred. One technique which may assist in gathering all pertinent information, and which Command Center officers should utilize more often, is found in the Communications Model. Before ending a call, a Command Center officer should set forth her understanding of the caller's allegation and the underlying details, such as the time and location of important events, the identity of the subject officer or officers involved, and, of course, information about the caller that will ensure that she can be contacted in the future. This restatement provides the caller with an opportunity to add or correct details and insures that she has provided a complete and accurate complaint. In addition, restating the caller's information insures that a Command Center officer will not dismiss a call prematurely simply because she has failed fully to understand the caller.

Summer of 1997 Sample

While there has been some improvement since the 1996 sample, in 10 calls from the 1997 sample, operators did not make satisfactory efforts to probe for all information pertinent to the case. The most common lapse related to the failure of an operator to obtain identifying information for individuals mentioned by the caller -- witnesses, subjects, etc. In one instance, the Command Center officer interviewed a friend of the caller who was present during the call. The friend had witnessed the underlying events and largely corroborated the caller's allegations. Neither the friend's address nor telephone number were ever ascertained by the Command Center officer. In another example, the complainant stated that she had knowledge of additional allegations concerning the subject officer. The Command Center officer made no effort to probe the caller, who wished to remain anonymous, as to the nature of these other allegations. Here was perhaps the only opportunity IAB had to interview the complainant, and that opportunity was simply not seized. In yet another example, the complainant alleged that his arrest was retaliatory because the complainant had lodged a complaint against the arresting officer's friend. The Command Center officer never inquired as to the identity of the officer's friend or the nature of the officer's relationship with this individual. The core of the complainant's allegation hinged on this alleged relationship. Any information regarding this relationship, particularly information as fundamental as the friend's name, should have been gathered.

6. Language Barriers

Summer of 1996 Sample

Only one call in the 1996 sample evaluated by the Commission involved a non-English speaker. In this instance, an interpreter or a Command Center officer who spoke the caller's language was not expeditiously found.[35]

To ensure that Command Center officers respond appropriately when engaging a foreign language speaker, subsequent to the 1996 sample, Command Center officers were subjected to ongoing undercover calls placed by investigators assigned to the Quality Control Unit who pose as non-English speakers lodging a complaint. Officers who fail these tests are provided additional training and may be subject to disciplinary action.

Summer of 1997 Sample

In the 1997 sample, three calls included foreign-language content. Twice the caller asked for a Spanish-speaking operator, and both times the caller was accommodated, although in one case the operator who initially answered was able to speak Spanish as well. In the other instance, the call began -- and was conducted mostly -- in English, but the caller switched to Spanish toward the end, and the operator was able to continue conversing with her. No problems of any kind were noted in the 1997 sample with regard to the handling of language barriers.

35. The Command Center has access to a "language line" which is a subscription service provide by AT&T through a special "800" number. The service provides translators in approximately 140 languages who are available to speak with non-English speaking callers 24 hours a day, 365 days a year. In the event that the Command Center receives a call from someone who speaks a language which cannot be translated over the language line, Command Center officers can contact the Department's Operations Section to try to locate a member of the Department who can translate for the caller or an outside agency that may be able to provide translation services.

7. Transfers

Summer of 1996 Sample

In five of the 35 calls from the 1996 sample, Command Center officers transferred callers to another agency. In two of these five calls, Command Center officers provided no explanation for the transfer and also failed to provide the direct number of the organization to which the caller was transferred.

In a third call the Command Center officer transferred a caller who made an allegation of serious misconduct or corruption. In that instance, the caller alleged that he had filed a complaint with CCRB, that the precinct "did him dirty," and that his complaint was not being investigated. The caller made it clear that he wanted to lodge a complaint with IAB about the precinct. However, instead of taking the caller's complaint and generating a log, the officer transferred the caller to the Chief of the Department so that the caller could attempt to obtain information concerning the status of his case.[36]

Summer of 1997 Sample

The 1997 sample showed marked improvement in this area. In fact, no callers were transferred to an outside agency.

8. Asking Inappropriate Questions

Command Center officers must be sensitive to the effect of inappropriate questions on callers.

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36. In another of the five calls, the officer transferred a call without first ascertaining the nature of the allegation. There, the caller's initial statements suggested that he may have wanted to report an allegation of misconduct, but the call was not counted by the Commission as an instance in which an operator made an improper transfer. This is because, for purposes of this study, improper transfers were limited to instances where a caller had made an allegation of corruption or misconduct about a member of the Department and was nonetheless transferred to another agency. An officer's failure to even ascertain the nature of an allegation, while clearly improper, did not fit the Commission's working definition of an improper transfer.

Summer of 1996 Sample

Although the Commission's 1996 sample did not include any calls in which a Command Center officer asked about a caller's race or social security number or made inappropriate comments about the caller's sex, in one call an officer asked whether the caller was employed. Although the officer apparently asked the question to obtain a business address, the caller was put off by the officer's question, apparently because it suggested that the caller might not have a job. The Command Center officer could have obtained the same information without potentially offending the caller simply by asking for a work telephone number and allowing the caller to volunteer employment information.

Summer of 1997 Sample

The 1997 sample again demonstrated generally good performances in this area: Only once was an inappropriate question asked. In that instance a caller was asked, "What's your pedigree?" When the caller hesitated over the word "pedigree," the operator clarified, "You Spanish, white, black?" The Department has made clear to the Commission, that such questions, even though extremely rare, are unacceptable.

9. Placing Callers on Hold

Summer of 1996 Sample

Of the 35 calls in the 1996 sample, 22 calls involved callers who were put on hold for some period of time. In 11 of the calls, the caller was placed on hold for over two minutes. In one of these eleven calls, the caller was placed on an "unannounced" hold (*i.e.* the Command Center officer did not advise the caller that she was being placed on hold). Moreover, in two instances callers were interrupted in the course of stating their allegations by a Command Center officer's abrupt direction to "hold on." Worse yet, in several calls involving a hold, a different

Command Center officer returned to the line and the callers had to repeat what they told the first officer, with no explanation offered by either the first or second Command Center officer for the hand-off. As demonstrated by some callers' comments to themselves, there is no question that callers can find these types of interruptions very unsettling.

Although many instances of hold appeared occasioned by a Command Center officer's efforts to obtain information for the caller or ask questions of a supervisor, callers often expressed frustration with the length of time for which they were placed on hold. In no instances did an officer return during long holds to assure the caller that she was not forgotten.

While Command Center officers may possess valid reasons for putting callers on hold, they should be sensitive to the effect of this action on callers. Callers who are placed on hold for long periods of time or who find themselves on hold without any warning are likely to feel that the Command Center is not receptive to their allegations. Indeed, some callers when placed on hold believe they have been disconnected. Indeed, one 1997 call was prematurely ended in this way, when a caller hung up while on hold even though the hold was not excessive.

Summer of 1997 Sample

While from the perspective of the caller, being placed on any hold remains a source of frustration, the Commission observed that in the 1997 sample, this is an area where the Command Center has shown marked improvement. Only once in the new sample of 30 calls was a caller placed on hold for more than two minutes -- and even then, it was for only a few seconds more.

IAB recognizes that avoiding problems from placing callers on hold requires constant attention. In the first issue of a newsletter recently begun by the Commanding Officer of the

Command Center, item #1 ("Putting Callers on Hold") addresses precisely this issue, advising operators on exactly how to advise callers they are being placed on hold.[37]

10. Identification by Command Center Officers

Command Center procedures require that an officer identify herself at the outset of a call. Typically, Command Center officers state "Command Center" or "Internal Affairs" and then their rank and last name. This identification establishes a relationship between the Command Center officer and the caller and assures the caller that she is speaking to someone who is prepared to receive a complaint. In addition, if the caller is disconnected for some reason or if the caller wants to complain about (or praise) the Command Center officer, the caller can name the officer with whom she initially spoke.

Summer of 1996 Sample

In two instances from the 1996 sample, Command Center officers failed to identify themselves to callers. Moreover, in numerous calls, the officers said their names so quickly that only the most discerning caller would have been able to understand and retain this information.[38] Whether intended or not, this rapid identification conveys a sense of impatience that callers may find non-conducive to reporting a corruption allegation. Further, in only a few calls did officers repeat their names for the caller's benefit at the conclusion of the call.[39]

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37. "Step #1: 'I'm sorry, but I must put you on hold due (name the reason -- research information, consult with supervisor, etc.) It will take approximately __ minutes to get this information. If you would like me to call you back, I will, when I get the information I need; if not please hold the line.'" (Command Center Memo, September 10, 1997.)

38. It bears noting that in the course of preparing this study the Commission staff often had to resort to Command Center duty rosters to ascertain the names of officers answering calls.

39. While repetition of the officer's name at the end of the call is apparently not required under IAB procedures, it is a good practice given that callers may not focus on the officer's name at the outset of a call. See Illustrative Call Number 1, supra at p. 17 (illustrating effective use of such practice).

Summer of 1997 Sample

These problems persisted in the 1997 sample. All of the operators in the 30 calls from the 1997 sample identified themselves by name at the outset of the call. Only twice did an operator fail to include her rank. In general, however, operators often stated their names so quickly that it would have been very difficult for a caller to understand them. Indeed, many callers asked the operator to restate her name. In one call an operator passed the call to another operator who never identified herself.

11. Efforts to Determine Caller's Reason for Calling at the Present Time

In most instances, callers' complaints involve conduct which has recently occurred and it is apparent why the callers decided to lodge their complaints at the time the calls are made. In other instances, such as when the alleged conduct occurred long ago or has purportedly been occurring for an extended period of time, a caller's reason for waiting to make a complaint must be elicited because it may prove significant in investigating the allegation.

Summer of 1996 Sample

Of the 35 calls, two calls involved situations in which the timing of the call, given the timing of the alleged conduct, appeared unusual. The first call involved alleged conduct that occurred several weeks before the caller's complaint and the Command Center officer properly requested information concerning the basis for the caller's decision to lodge the complaint at that time. The second call involved an allegation that a police officer had been abusing drugs for approximately one year. Although the officer did a good job in obtaining other relevant information, she did not elicit any information concerning the caller's failure to lodge the complaint earlier.

Summer of 1997 Sample

Three of the 30 calls in the 1997 sample involved specific incidents that occurred more than a month earlier, but in none of these cases did the operator attempt to determine what had caused the delay. In one additional call, the caller related an event that happened some time in the past, but the operator did not even inquire when it had taken place, much less why the caller was calling only now. And in one more case, the allegation involved ongoing conduct that had been occurring for about a year, but the operator again failed to ask the caller's reason for calling at that time.

12. Observations Concerning "Chronic" Callers

Summer of 1996 Sample

As noted above, 15 of the 55 selected calls from the 1996 sample involved individuals who appeared to be "chronic" callers (*i.e.* individuals who appear to be emotionally unstable, who do not make rational allegations, and who call the Command Center multiple times). In most instances, the Command Center officers recognized the callers' voices, responded to them courteously, and allowed the callers to tell their often rambling stories without challenging or interrupting them. The Commission's review of these calls revealed no major weaknesses in the handling of chronic callers. The Commission notes, however, that Command Center officers spend a significant portion of their time responding to these callers.

Summer of 1997 Sample

The Commission's 1997 sample did not include calls from individuals who appeared to be chronic callers.

VI. MISCELLANEOUS OBSERVATIONS

In 1994, the IAB Training Unit concluded that Action Desk officers "view themselves as the lowest echelon of the Internal Affairs Bureau and view the Action Desk as a dumping ground for people who have performed unsatisfactorily in other assignments." (October 31, 1994, Memorandum from Commanding Officer, IAB Training Unit) In May 1996, IAB took a major step to boost morale among Command Center personnel by moving the Center from a cramped, windowless room to much more comfortable and functional quarters.

In preparing this report, the Commission visited the Command Center on several occasions and observed the officers assigned there while they answered phone calls and processed complaints. During these visits, the Commission had the opportunity to ask the officers about their work and the Command Center's functions. As a general matter, officers on Command Center duty are selected at the time they are assigned to IAB, while others transfer there from other assignments within IAB. On average, prior to September 1997, there were four officers assigned to the Command Center for each tour, including a supervisor. See discussion regarding enhanced supervision, infra at pp. 59-60.

In the Command Center, officers have access to a variety of computer terminals and databases providing background information on members of the Department (such as disciplinary records, assignments, and prior allegations of misconduct or corruption). Command Center officers are also required to enter information about allegations against members of the Department into IAB's database, known as "IXLO," and the Department's new "PRIDE" computer system.[40] The PRIDE system is designed to merge and replace several existing databases, including IXLO, and is currently being field tested. For the time being, Command

40. See note 5 supra at p. 3 for a description of the IXLO and PRIDE computer systems.

Center officers are required to enter information in both systems. The PRIDE system requires Command Center officers to complete various data screens which capture the critical details to identify the caller, subject(s), witnesses, and other important information regarding the allegation. Once inputted, case investigators have instant access to this data. Apart from telephones, telephone call recording equipment, and computer terminals, there was also a television in the Command Center, which officers told Commission staff remained tuned to news programming to monitor reports related to the Department and police misconduct.[41]

Assigned to the only office in the building open 24 hours a day, Command Center officers, in addition to performing complaint intake duties, serve as receptionists, security guards, and food delivery coordinators. Further distracting them from their intake duties, Command Center officers receive numerous requests from precincts and IAB investigation groups to look up phone numbers and run license plates -- duties which can be performed by the officers requesting the information. All calls received by the Command Center (except for calls on the "PRIDE" and "CORRUPT" lines, as discussed supra at p. 1) are recorded on a single tape with four separate tracks. Thus, up to four calls can be recorded simultaneously. When reviewing the tapes, however, Commission staff noted that it was unusual that more than one or two tracks were in use at any time. This was consistent with the 1997 sample.

41. However, in the course of reviewing Command Center calls, the Commission noted several instances in the 1996 sample in which background noise indicated that talk shows or situation comedies were playing on the Command Center television. It was clear that the television overheard in these calls was playing at the Command Center and not at the caller's end because the sound of the television discontinued when the caller was placed on hold or the same program could be heard when the Command Center responded to succeeding calls. This background noise was distracting and not conducive to creating an environment where callers believe that their allegations are taken seriously. IAB acted to correct this problem and has removed the television set from the Command Center.

VII. THE LOUIMA CALL

In the early morning hours of August 9, 1997, Abner Louima was allegedly brutally sodomized in the station house of the 70th precinct. Initially it was reported that the IAB Command Center received these allegations on the afternoon of August 10, 1997. In response, IAB acted swiftly and aggressively and within five days four arrests were made, numerous officers were suspended, and ranking supervisors of the precinct were transferred. Approximately a week following the incident, it was learned that the call which spurred the IAB investigation was not the first call the Command Center had received alleging the attack on Louima. IAB then reviewed the relevant tapes and determined that the Command Center had received a call nearly 17 hours before the call which spurred the IAB inquiry. This call, which IAB has reported was received by an officer during his first tour on the Command Center, was never logged, although it provided specific information as to the allegations and was plainly sufficient to have generated a log and an immediate response by IAB. While the Commission has been briefed on the substance of the call, the United States Attorney's Office for the Eastern District has asked that, because of its pending criminal investigation, we not review the recording of the call or otherwise investigate the failure to log this allegation. The Commission has complied with this request.[42]

VIII. THE DEPARTMENT'S EFFORTS TO IMPROVE THE EFFICACY OF THE COMMAND CENTER

Since the Mollen Report and the Commission's 1996 report on the Action Desk, the Department has taken a number of steps to improve the performance of the Command Center.

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42. Upon learning of this failure, IAB promptly disclosed these facts publicly and took disciplinary measures against the Detective.

A. IAB's Earlier Self-Monitoring Program

In a memorandum dated June 11, 1996, addressed to Command Center Commanding Officers, the Executive Officer of IAB's Investigative Support Division announced a quality control monitoring program. See Appendix D, ¶ 1.

As the memorandum further explained, the monitoring program was designed to ensure that these goals are met by requiring each sergeant assigned to the Command Center to review five calls per week and the Center's commanding officer to review an additional five calls per week. According to the memorandum, the monitoring is primarily intended as a "training tool," although "serious discrepancies should be immediately corrected by the reviewing supervisors." Id at p. 1. For example, if review of a call reveals information that should have been included in a log but is missing from it, the reviewing officer should correct the log.

B. The IAB Quality Control Unit

The Quality Control Unit ("QCU") is the branch of IAB which conducts self-inspections and internal audits. The QCU performs the critical and valuable function of identifying weaknesses in IAB's performance so that IAB's management may take corrective action.[43] The QCU has done several Command Center call reviews independently to assess the quality of the Command Center officers' response to callers. As part of this study, the Commission requested all materials in connection with QCU's reviews. In response, the Commission received various reports discussing the results of QCU's call reviews.[44] The reports typically state at the outset

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43. In connection with the QCU's ongoing monitoring of the performance of the Command Center, the Commission was informed that the QCU determined that many Command Center officers were improperly not generating logs for CCRB complaints and instead were transferring the complainants to that office. See discussion supra at p. 36.

44. The reviews are dated May 20, 1996; June 28, 1996; August 12, 1996; August 15, 1996; August 26, 1996; October 7, 1996; November 18, 1996; January 15, 1997; February 4, 1997; and March 14, 1997.

that the calls have been reviewed for "professionalism, efficiency and the manner in which they were handled from the time the call was received until the time the call ended." The reports then contain summaries of each call reviewed, with a statement at the end of each summary about whether the officer handled the call in an effective, professional manner and, if not, what the officer did incorrectly. Each report also includes a general summary section providing an overview of all the calls contained in the report.

Although the majority of call reviews conclude that Command Center officers acted in an efficient and professional manner, elicited the necessary information, and assigned logs where appropriate, the reports also reveal that, in at least several instances, deficiencies similar to those identified by the Commission in this report were identified by QCU.

According to IAB, deficiencies noted by QCU are brought to the attention of the Commanding Officer of the IAB Investigative Support Division, who responds to these types of deficiencies by contacting the complainant to obtain a full recitation of the allegations, providing the Command Center officer with individual training, and, if appropriate, disciplining or transferring the officer who failed to perform adequately.

C. Personnel Changes and Discipline

Between February 1996 and September 1997 IAB transferred six Detectives and one Sergeant from the Command Center for poor performance including the failure to log allegations of corruption, arguing with callers, and challenging their truthfulness. The transferred Sergeant and one of the Detectives also received Command Discipline. Between July 1997 and August 1997, two additional Detectives received Command Discipline for misconduct including: failing to log a complaint or discourtesy. Indeed, one of these latter two Detectives appeared in both of the Commission's samples and was observed to be discourteous and argumentative. IAB has

continued to monitor this Detective's performance and has noted positive results since the discipline was administered in July 1997.

D. IAB's Training of Command Center Officers

1. The 1994 IAB Training Needs Analysis

In October 1994, IAB's Training Unit (the "Unit") conducted an "extensive needs analysis" of the Command Center and identified a need for enhanced training for Command Center personnel. In particular, the Unit found that Command Center officers were not versed in appropriate procedures and policies to guide them in performing their duties.

In addition, the Unit concluded that Command Center officers suffered from a lack of training in interview skills. The Unit reported that, prior to several one-day training sessions which it provided in 1994, Command Center officers received no formal instruction in pertinent communication or interviewing skills. Instead, new officers would simply observe a more experienced officer handle calls for a "short period of time" and then begin answering calls on their own. The Unit went on to recommend that all officers newly assigned to the Command Center should receive expanded and formal training focusing on interviewing and preliminary investigations and that training should include "interactive role plays and case studies" (October 31, 1994, Memorandum from Commanding Officer, IAB Training Unit). Despite the Unit's 1994 recommendations, until December 1996, Command Center training consisted of on the job training and the 2 week general training course, discussed in the following section, which all IAB investigators attend.

2. Current Command Center Training

IAB informed the Commission that its personnel attend a two-week general Internal Investigation course upon their assignment to the Bureau. In December 1996, IAB began

providing on a regular basis an additional two-hour training session on interviewing and interrogation for officers assigned to the Command Center.

Commission staff attended a simulated session of the recently implemented interview and interrogation training session to evaluate its efficacy.[45] During the training, the instructor covered a range of topics, many of which are essential to the effective operation of the Command Center. For example, the training included the proper way for a Command Center officer to identify herself when answering a call; how to handle "worried," "uncooperative," and "hostile" callers; procedures for placing callers on hold; and the need to restate the facts of an allegation to a complainant before ending a call. The training also emphasized that the single overriding principle Command Center officers should bear in mind is that "the presumption is always in favor of the caller," and that callers should generally receive the same consideration afforded crime victims.

The training also covered basic interview techniques. For example, the instructor discussed the details to be elicited from callers (e.g., descriptions should include clothing) and the need to demonstrate interest in the caller's information. While these instructions may be covered in IAB's general two-week course on internal investigations provided to all IAB personnel, they nonetheless bear repeating no matter how experienced an investigator may be .

The Command Center training, however, also devoted a substantial amount of time to interview techniques which are more sophisticated than officers assigned to the Command Center will ever need to employ, rather than focusing on fundamental skills required for Command Center officers. These aspects of the training included FBI videotapes on

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45. That session was provided for the Commission staff alone and was not attended by any officers. Consequently, the Commission was unable to assess how the course is received by officers assigned to the Command Center. Nevertheless, IAB has assured the Commission that the presentation and substance of the training session provided to Commission staff was identical to that provided to officers.

sophisticated interviewing techniques and questioning victims of violent crime, topics that have little relevance to the Command Center's functions, given the types of allegations received by the Center. Moreover, since the amount of time afforded Command Center training is brief, instruction in sophisticated interview methods can be no more than introductory and is best addressed in separate training.

This is particularly true since some instruction that may be necessary to improve the Command Center's operations has until recently not been provided during Command Center training. Officers assigned to the Center should receive comprehensive, step-by-step instruction on how to handle a call from start to finish. This should include, among other things, review of sample logs and detailed explanation of the type of information that must be included in the logs; additional emphasis on the significance, both to the Department's public image and to its anti-corruption efforts, of adopting an appropriate "attitude" when dealing with callers; and addressing the recurring problems which the Commission has identified above.[46] A useful tool for accomplishing this training might be to have officers listen to recordings of actual calls which were handled both especially well and poorly.

Thus, while IAB should be commended for implementing a separate training session for Command Center officers, some improvements to the training are needed.[47]

E. A Recruitment Initiative

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46. The Training Guide referenced among the Command Center materials provided to the Commission by IAB (See supra at pp. 10-13) is not distributed as part of the training implemented in December 1996, but is separately distributed to officers assigned to the Command Center. During the current training, the instructor distributes copies of an FBI manual on interviewing and interrogation. The manual includes, among a variety of materials, sections on basic questioning methods.

47. IAB informed the Commission that it has already begun to address these training concerns. See infra at p. 61.

In April 1996, shortly before the time frame reflected in the Commission's 1996 sample, the CHIA of Internal Affairs engaged in a recruitment effort to try to ensure that the Command Center is staffed with dedicated officers capable of meeting the unique demands placed on Command Center employees. By communicating with various precinct commanders, the CHIA identified several police officers whose past performance was deserving of reward. These officers were recruited by the CHIA for assignment to the Command Center under the explicit understanding that if they performed well, within 18 months they would be promoted to Detective.[48] It is IAB's belief that, by providing such a meaningful incentive, it will be able to secure Command Center staff of the highest caliber.

F. New IAB Initiatives

Commission staff met with the Chief of Internal Affairs ("CHIA") to discuss its findings contained herein. The CHIA recognized the critical function performed by the Command Center and committed to continuing to improve its effectiveness. To do so he has initiated several new programs.

1. The Development of a New Curriculum for Training

IAB believes that many of the deficiencies noted by the Commission may be attributed to inadequate training. Recognizing this, IAB several months ago recruited an experienced trainer from the Department's Training Academy. With the assistance of a Sergeant, this officer's responsibilities are exclusively devoted to reviewing the performance of the Command Center

48. The ability to limit promotions to those who perform well may be affected by rules requiring that all police officers who serve in an investigative assignment for a minimum of 18 months be automatically appointed to the rank of Detective. To deal with this potential problem the CHIA of Internal Affairs has advised the Commission that a decision as to whether these officers are performing sufficiently well to justify their promotion will be made within this 18-month period.

and developing a new curriculum for training to address the weaknesses IAB has detected on its own initiative, through its QCU, as well as those noted in this report.

2. Self-Monitoring and Enhanced Staffing After the Louima Incident

The CHIA of Internal Affairs emphasized IAB's efforts in engaging in a continuous program of self-monitoring of the Command Center. In response to the Commission's findings and the failure of a Command Center officer to log the initial allegations involving Mr. Louima, the CHIA has commenced an intensive review of calls received by the Command Center. To do this, staff of the QCU and the Command Center have been enhanced. Commencing in September 1997, an additional Sergeant was assigned to the QCU with the exclusive responsibility of reviewing calls lodged with the Command Center to determine that all allegations of corruption and misconduct were properly logged and that Command Center staff interact with the public professionally and courteously. The Sergeant's responsibilities are threefold: 1) to review randomly calls in various blocks of time designed to review the performance of all Command Center personnel, 2) the review of targeted calls of specific Command Center officers, and 3) special assignments, such as focusing on calls received during the midnight tour, the time period when corrupt activity is believed to be the most prevalent.

Additionally, the CHIA has instituted a daily systematic review of all calls received by the Command Center. At the conclusion of each tour, a Sergeant assigned to the Command Center is instructed to review all of the calls recorded by the Command Center from the previous tour to ensure that calls which were logged were logged properly, that logs were generated for all calls containing allegations of corruption or misconduct, and that staff is performing professionally and respectfully. Additionally, Command Center supervisors are reviewing Daily Index Sheets which track all calls received by the Command Center which are not logged to

ensure that all allegations were properly recorded. To accomplish this, the staff of the Command Center is being expanded to include two additional Lieutenants and three additional Sergeants. Moreover, a Captain has replaced a Lieutenant as the Commanding Officer of the Command Center.

IX. CONCLUSIONS AND RECOMMENDATIONS

IAB has taken positive steps to ensure that the Command Center performs effectively and these steps have improved its performance. As discussed above, however, various of the previously identified problems - - particularly relating to argumentative behavior, incomplete logging, and not obtaining critical information - - continue to exist in a number of calls. Given that these problems persist additional steps need to be considered. The Commission therefore makes the following recommendations:

- **Evaluate a Potential Re-engineering of Command Center Including Use of Civilians:** While the Commission has not concluded whether civilianization of these functions should be implemented, the Department should evaluate how the Command Center is staffed and consider whether fundamental change of its present staffing model is warranted. Specifically, the Commission recommends that the Department consider replacing a substantial number of Command Center officers with civilians who could be trained to take key information and then to refer callers in particularly serious matters to duty Detectives who also would be present in the Command Center. These civilians would be carefully selected and would be under the constant supervision of ranking non-civilian IAB staff. The civilian force also would take responsibility for all routine phone calls that come into the Command Center from non-civilians. While there may be legitimate issues in connection with adopting this approach, we believe that

the Department should evaluate it and provide a report to the Commission and the Mayor. The Commission is prepared to cooperate in connection with this evaluation.

- **Training:**

An effective Command Center training program must include training in communication skills as well as the basics of generating a concise and accurate complaint with as much information regarding the allegations, the officers allegedly involved, and any witnesses to the alleged events. The Commission's latest review of calls indicates that training with respect to sensitivity and professionalism is also needed.

Training classes should include, among other things: sample log reviews and detailed explanation of the type of information that must be included in the logs; additional emphasis on the significance, both to the Department's public image and to its anti-corruption efforts, of adopting an appropriate "attitude" when dealing with callers; and addressing the recurring problems identified above. For guidance, Command Center officers should listen to recordings of actual calls which were handled in an exemplary as well as an unsatisfactory manner.

IAB informed the Commission that it has already begun to implement these recommendations. Commission staff have had an opportunity to review drafts of the new training curriculum and have noted that it addresses many of the Commission's concerns, including the need for Command Center officers to be respectful and courteous to Command Center callers.

- **Distribution of Intake Worksheet to Case Investigators:**

IAB's PRIDE database is currently undergoing field testing. Command Center officers input all relevant information provided by callers directly into the PRIDE system.[49] The PRIDE

49. See supra at p. 51.

system requires Command Center officers to complete various screens which contain fields to identify the complainant, subject(s), witnesses, physical descriptions, shield number, etc. These fields prompt Command Center officers to question callers as to all aspects of their complaint. Once inputted into the PRIDE database, this information is readily available to case investigators. Additionally, Command Center officers are recording this information manually on Intake Worksheets. Based on the Commission's recommendations to more effectively utilize these worksheets, as of July 1997, IAB began to provide these worksheets (in addition to tape recordings of the relevant call to the Command Center) to the case investigators to assist them in commencing their inquiry.

- **Supervisory Review of Intake Worksheets:**

Supervisors should review all Intake Worksheets to determine whether Command Center Officers are obtaining all required information. Officers should be instructed to complete each section of the form or make a notation indicating why the information was unavailable. Similarly, this kind of review should take place of the data inputted on PRIDE.

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Appendix A

Training Guide

N.Y.C.P.D. - INTERNAL AFFAIRS BUREAU
ACTION DESK TRAINING GUIDE

I-N-D-E-X

DUTIES AND RESPONSIBILTIES - ACTION DESK INVESTIGATING OFFICER	P.1
INCIDENTS REQUIRING "CALLOUT NOTIFICATIONS"	P.2
DUTIES AND RESPONSIBILTIES - ACTION DESK SUPERVISOR	P.3
	P.4
	P.5
MISCELLANOUS INFORMATION	P.6
HOW TO ACCESS INFORMATION FROM SPRINT SYSTEM	P.7

(NAME REDACTED) COMMANDING OFFICER, I.A.D. ACTION DESK.

DUTIES AND RESPONSIBILTIES - ACTION DESK INV. OFFICER

1. ANSWER PHONE: INTERNAL AFFAIRS BUREAU, P.O. OR DETECTIVE, THEN GIVE NAME.
2. PRIORITIZE CALLS, MOS OR RANKING MOS (SUPV.) CAN CALL BACK OR BE CALLED BACK. IF A CIVILIAN TERMINATES CALL, INFORMATION OR ALLEGATION BEING REPORTED CAN BE LOST FOREVER. ALWAYS FIND OUT WHAT THE CIVILIAN'S COMPLAINT IS AND HANDLE IT FIRST IF IT IS A SERIOUS ALLEGATION.
3. USE ACTION DESK INTAKE FORM AND FILL IN ALL CAPTIONS WHEN TAKING A COMPLAINT. KEEP IN MIND THE 5 "W'S", WHO, WHAT, WHERE, WHEN, WHY AND HOW? OBTAIN SHIELD NUMBER, TAX NUMBER AND NAME IF POSSIBLE. DEPARTMENT VEHICLE PLATE NUMBER AND A DETAILED PHYSICAL DESCRIPTION OF ALL POSSIBLE SUBJCETS.
4. BEFORE ENTERING LOG INTO IXLO OR PRIDE SYSTEM, INVESTIGATING OFFICER MUST CONDUCT ALL APPROPRIATE CHECKS.
   A) SPRINT SYSTEM - VERIFY ADDRESS GIVEN AND ATTACH COPY OF A CORRESPONDING SPRINT JOB TO ORIGINAL COPY OF LOG.

   B) CSSN/MOS DATE FILE - VERIFY NAME, PHONE NUMBER AND ADDRESS GIVEN TO CONFIRM IF IT COMES BACK TO A M.O.S..
   C) BADS SYSTEM - COMPLAINANT/PRISONER ALLEGED PROPERTY TAKEN BY M.O.S., ATTACH COPY OF ARREST REPORT WHEN AVAILABLE ANYTIME A PRISONER MAKES ALLEGATION.
   D) FINEST SYSTEM - USED TO ASCERTAIN DMV INFORMATION. RUN PLATE OR NAME GIVEN TO SEE IF VEHICLE IS REGISTERED TO A M.O.S.. ATTACH COPY OF PRINTOUT TO LOG.
   E) ARCS SYSTEM - USED TO FIND OUT WHAT COMMAND A DEPARTMENT VEHICLE IS ASSIGNED TO AND A M.O.S' WORK SCHEDULE. E.G. WAS MOS WORKING AND ASSIGNED TO A SECTOR THAT WAS AT SCENE WHEN ALLEGED INCIDENT OCCURRED.
   F) ROUND ROBIN/HISTORY CHECK OF MOS - ATTACH ALL C AND M CASES ON SUBJECTS OR POSSIBLE SUBJECTS TO LOG. ALSO, ANY RELATIVE LOGS. E.G. FAMILY DISPUTE ALLEGATION, PRIOR LOG INVOLVING COMPL AND M.O.S. MAY HAVE BEEN CLASSIFIED AS AN O.G. BACK TO HIS/HER C.O. FOR FURTHER INVESTIGATION. DUTY CAPTAIN INVESTIGATING INCIDENT SHOULD BE APPRISED OF ALL PRIOR ALLEGATIONS RELATIVE TO ALLEGATION THEY ARE INVESTIGATING. THIS WILL ASSIST DUTY CAPTAIN IN MAKING A DETERMINATION REGARDING SUBJECT OFFICER'S DUTY STATUS AND POSSIBLE COUSNELING REFERRALS. ****NOTE**** NO INFORMATION IS TO BE RELEASED ON OPEN C CASES WITHOUT APPROVAL OF IAB DUTY CAPTAIN OR IAB GROUP COMMANDING OFFICER.
   5. RECORD ALL NOTIFICATIONS IN LOG. E.G. SHOOTING LOG "M.O.S. SHOT PERP.", ENTER TIME AND NAME OF IAB DUTY CAPTAIN, GROUP PERSONNEL NOTIFIED. ALSO, TIME ALPHA PAGER MESSAGE WAS SENT TO IAB HIGH ECHELON, AND TIME AND NAMES OF ALL OTHER PERSON(S) NOTIFIED.
   6. MAKE CASSETTE TAPE OF ALL LOGS CALLED IN BY A CIVILIAN THAT WILL BECOME AN M OR C CASE.
   7. MAKE ENTRIES IN IAB MOVEMENT LOG, LEAVING THE CITY LOG AND IAB RENTAL VEHICLE ACCIDENT/INCIDENT LOG.
   8. MAKE COPIES OF ALL 49'S, 61'S AND RELATED PAPERWORK AND ATTACH TO ALL FIVE COPIES OF IXLO LOGS AT ACTION DESK.
   9. BRING ALL LOGS TO THE ATTENTION OF ACTION DESK SUPERVISOR THAT REQUIRE A CALL OUT FOR A RESPONSE BY AN IAB GROUP, INSPECTIONS UNIT OR PATROL DUTY CAPTAIN.

INCIDENTS REQUIRING "CALLOUT NOTIFICATIONS"

1. SHOTS FIRED BY M.O.S., PERPETRATOR HIT, NOTIFY IAB DUTY CAPTAIN AND IAB GROUP CONCERNED.
2. PERPETRATOR INJURED WHILE IN POLICE CUSTODY, NOTIFY IAB DUTY CAPTAIN AND IAB GROUP CONCERNED.
3. M.O.S. COMMITS SUICIDE, NOTIFY IAB DUTY CAPTAIN.
4. FAMILY DISPUTE M.O.S. INVOLVED, NOTIFY IAB DUTY CAPTAIN.
5. PRISONER ALLEGES PROPERTY TAKEN, CALL OUT IAB GROUP CONCERNED.
6. BRIBERY OF M.O.S., NOTIFY INSPECTIONS UNIT CONCERNED.
7. CONTROLLED PAD - NOTIFY IAB DUTY CAPTAIN, IAB GROUP C.O. IF AVAILABLE AND SEND IAB GROUP CONCERNED.
8. GENERAL CRITERIA TO ASCERTAIN IF ALLEGATION SHOULD BE CALLED OUT: IF COMPLAINANT IS AVAILABLE FOR INTERVIEW, SERIOUSNESS OF ALLEGATION AND WHEN IT OCCURRED ARE ALL FACTORS IN DETERMINING IF A LOG SHOULD BE CALLED OUT. WHEN IN DOUBT, CONFER WITH IAB DUTY CAPTAIN OR IAB GROUP C.O. IF HE/SHE IS AVAILABLE, AS TO IF LOG SHOULD BE CALLED OUT TO AN IAB GROUP, INSPECTIONS UNIT OR PATROL DUTY CAPTAIN.

DUTIES AND RESPONSIBILTIES OF ACTION DESK - SUPERVISOR

1. CHECK ALL PROPERTY AT ACTION DESK, SAFE, RADIOS, VEHICLES ASSIGNED TO TO ACTION DESK, ENSURE ALL COMPUTERS ARE OPERATIONAL AND THAT PREMISES AT 315 HUDSON STREET IS SECURE.
2. REVIEW ALL LOGS FOR ACCURACY AND COMPLETENESS AND SIGN OFF ON THEM.
3. ENSURE THAT DICTAPHONE TAPES ARE OPERATIONAL AND CHANGE TAPES WHEN NECESSARY.
4. KEEP IAB DUTY CAPTAIN AND IAB HIGH ECHELON APPRISED OF ALL LOGS OF A NEWSWORTHY URGENT NATURE. E.G. M.O.S. SHOOTS AND KILLS PERPETRATOR, M.O.S. ARRESTED FOR SERIOUS CRIME (RAPE, CHILD ABUSE, ETC.,). M.O.S. INVOLVED IN OFF DUTY ROWDY CONDUCT, E.G. WASHINGTON D.C. INCIDENT.
5. ENSURE ALL LOGS REQUIRING A RESPONSE BY AN IAB GROUP, INSPECTIONS UNIT OR PATROL DUTY CAPTAIN ARE CALLED OUT.
6. ENSURE THAT UPDATES ARE OBTAINED BY ACTION DESK PERSONNEL ON ALL LOGS THAT ARE CALLED OUT FOR A RESPONSE.
7. ****LATE TOUR SUPV.**** ENSURE ALL POLICE RELATED ARTICLES ARE CUT FROM NEWSPAPERS AND DISTRIBUTED TO IAB HIGH ECHELON.
8. ****LATE TOUR SUPV.**** PREPARE INCIDENT SUMMARY (24 HOUR RECAP OF LOGS TAKEN) AND DISTRIBUTE TO IAB HIGH ECHELON.
9. ****LATE TOUR SUPV.**** ENSURE THAT ALL LETTERS, COMMUNICATIONS FOWARDED BY THE POLICE COMMISSIONER'S OFFICE, OFFICE CHIEF OF INTERNAL AFFAIRS, DEPARTMENT OF INVESTIGATION AND GENERAL PUBLIC ARE REVIEWED AND THAT A LOG IS PREPARED IF NECESSARY.
10. ****WEEKEND SUPV.**** PREPARE LIST OF ALL IAB GROUP PERSONNEL THAT ARE WORKING ON YOUR TOUR AND ADVISE IAB DUTY CAPTAIN OF IAB GROUP PERSONNEL WHO HAVE CALLED IN TO THE ACTION DESK ON DUTY.
11. MAKE PRELIMINARY ASSESSMENT OF LOGS TAKEN ON YOUR TOUR AT ACTION DESK, USING THE FOLLOWING CRITERIA:
    A) "C" CORRUPTION, SERIOUS MISCONDUCT, CRIMINAL ACTIVITY.
    B) "M" MISCONDUCT, NO CRIMINAL VIOLATIONS.
    C) "OG" MINOR PATROL GUDIE VIOLATIONS OR DEFICIENCIES WITH NO APPARENT CRIMINALITY.
    D) "D" CORRUPTION INVOLVING ARMED LAW ENFORCEMENT, CODRECTIONS - NOT NYPD.
    E) "CX" ALLEGATION OF ADMINSTRATIVE NATURE INVOLVING OTHER AGENCIES. E.G. NYC BOARD OF EDUCATION EMPLOYEE.
    F) "FILE" FOR STATISTICAL PURPOSES ONLY, NO CORRUPTION.
    G) "CCRB" FADE ALLEGATIONS (ABUSE OF AUTHORITY, ETHNIC SLUR, DISCOURTESY, FORCE).

LOGS ASSIGNED AS FOLLOWS

C CASE ASSIGNMENT - ASSIGNED BY GEOGRAPHICAL AREA, E.G. PO JONES ASSIGNED TO THE 025 PCT., WILL GO TO GRP. #11. IF PO JONES IS ASSIGNED TO MED/DIV., WILL GO TO GRP#26 WHICH IS RESPONSIBLE FOR THAT COMMAND LOCATION.
IF YOU HAVE SUBJECTS COMMAND, THE GROUP COVERING THAT COMMAND WILL BE ASSIGNED THE CASE.
IF NO SUBJECT IS I.D. AND THERE IS A LOCATION, THE GROUP COVERING THAT LOCATION WILL BE ASSIGNED THE CASE.
IF NO SUBJECT OR LOCATION AND THERE IS A COMPLAINANT, THE GROUP COVERING THE COMPLAINANT'S RESIDENCE COMMAND WILL BE ASSIGNED THE CASE.

IF NO SUBJECT, LOCATION OR COMPLAINANT GIVEN, SEEK ADVICE FROM INSPECTOR MAJOR, C.O., ISD, OR SGT. CONTIND, ASSESSMENT UNIT SUPV..
WHEN DETREMING A C CASE OR OTHER ASSESSMENT, CHECK TO SEE IF SUBJECT HAS A SIMILAR OPEN CASE, THEN INSTEAD OF A NEW C, YOU WILL ADD THIS LOG TO AN EXSISTING C CASE.
WHEN IN DOUBT CONFER WITH GROUP COMMANDING OFFICER OR SEEK ADVICE FROM INSPECTOR MAJOR, C.O., ISD, OR DESIGNEE.
C CASES ARE USUALLY A RESULT OF A DRUG, PAYOFF, FLAKING, CRIMINAL ACTIVITY (THEFT OF MONEY) TYPE ALLEGATION. ACTION DESK SUPV. MUST USE HIS/HER DISCRETION.
M CASE ASSIGNMENT - ARE FOWARDED TO INSPECTIONS UNIT AND ARE ASSIGNED ACCORDING TO THE SUBJECT'S COMMAND AS ARE C CASES. E.G. PO SMITH, 040 PCT., IS LEAVING WORK EARLY WITHOUT SUBMITTING A UF28, LOG WOULD BE ASSESSED AS AN M TO PBBX-INSPECTIONS.
M CASES ARE USUALLY SERIOUS FAMILY DISPUTES WHERE WEAPONS ARE USED TO MENACE OR THREATEN A COMPLAINANT, BOGUS SUMMONSES BEING ISSUED, FREE MEALS, DISCREPENCIES IN VOUCHERS. ****NOTE**** MISSING NOT VOUCHERED PROPERTY WILL BE ASSESSED AS A C CASE. DRINKING ON DUTY WOULD BE ANOTHER EXAMPLE OF A M CASE.
CASES ARE DESIGNATED M'S WHEN THEY FALL BETWEEN A C ALLEGATION AND WHAT WOULD BE CONSIDERED PATROL IMPROPRIETIES. ONCE AGAIN THE ACTION DESK SUPERVISOR WILL USE HIS/HER DISCRETION BASED UPON THE SERIOUSNESS OF THE ALLEGATION.
OG CASES - ARE BASICALLY PATROL VIOLATIONS OR MINOR IMPROPRIETIES. E.G. PO LYNCH, 032 PCT., REFUSED TO TAKE A COMPLAINT REPORT, OR FAILED TO TAKE PROPER POLICE ACTION, MAKE AN ARREST. OTHER EXAMPLES WOULD BE FOUND NARCOTICS IN AN RMP, FIREARM DISCHARGE - NO MISCONDUCT NOTED, SHOOTINGS - NO MISCONDUCT NOTED, LOST/STOLEN FIREARM, SHIELD AND ID CARD. ****OR ANY COMPLAINT WHICH DOES NOT FALL INTO CORRUPTION/SERIOUS MISCONDUCT ALLEGATION AND APPEARS TO BE A MINOR INDISCRETION WARRANTING THE ATTENTION OF THE SUBJECT'S COMMANDING OFFICER FOR FURTHER INVESTIGATION.
D CASE - CORRUPTION INVOLVING ARMED LAW ENFORCEMENT OTHER THAN THE NYPD. E.G. NYC CORRECTIONS OFFICER.
CX CASE - ALLEGATIONS OF AN ADMINSTRATIVE NATURE INVOLVING OTHER CITY AGENCIES. E.G. NYC BORAD OF EDUCATION EMPLOYEE, SANITATION EMPLOYEE OR OTHER CITY EMPLOYEE.
FILE - FOR NON-CORRUPTION OR MISCONDUCT COMPLAINT, WHICH WILL BE TAKEN FOR STATISTICAL PURPOSES. E.G. LOST OTHER, LOST VITAL, BRIBERY LOG. ****EXCEPTION**** LOST OTHER OR LOST VITAL LOGS WITH NO 61 NUMBER WILL BE ASSESSED AS AN OG, STOLEN/LOST GUNS WILL BE ASSESSED AS AN OG.
CCRB - THOSE LOGS THAT FALL INTO F-A-D-E CATEGORY, FORCE, ABUSE OF AUTHORITY DISCOURTESY, ETHNIC SLUR. THESE LOGS WILL BE ASSESSED CCRB BUT WILL BE FOWARDED TO GRP#54 FOR REVIEW. GRP#54 WILL RECOMMEND IF LOG SHOULD BE ASSIGNED TO INSPECTIONS UNIT ACCORDING TO THE SEVERITY/SERIOUSNESS OF THE ALLEGATION.

IMPERSONATION LOGS - ONLY IMPERSONATIONS CLASSIFIED AS ROBBERIES WILL BE ASSIGNED TO GRP#51 (IMPERSONATIONS UNIT). ALL OTHERS WILL BE CLASSIFIED AS A FILE AND A COPY GOES TO GRP#51 AND THE IAB GROUP COVERING THE EVENT LOCATION.
****IMPERSONATION LOGS WITH NO 61 WILL BE SENT BACK TO THE ACTION DESK AND UPDATED WITH THE 61 NUMBER WHEN IT IS OBTAINED.****

ADDITIONAL INFO:

MAKE SURE BEFORE ASSIGNING A NEW C THAT THERE IS NOT AN EXSISTING SIMILAR CASE TO ADD THE NEW LOG TO. THIS ALSO APPLYS TO M CASES. MAKE SURE IMPERSONATION LOGS HAVE 61#S, AS WELL AS LOST OTHER, LOST VITAL AND BRIBERY LOGS. ALL LOGS WHICH REQUIRED A CHECK BE CONDUCTED VIA THE SPRINT SYSTEM, CSSN/MOS DATE FILE, BADS SYSTEM, FINEST SYSTEM, ARCS SYSTEM OR THAT REQUIRED A ROUND ROBIN/HISTORY CHECK OF A MOS WERE PERFORMED AND THAT PRINTOUTS OF THESE CHECKS WERE ATTACHED TO THE IXLO COPIES OF THE LOG.

MISCELLANOUS INFORMATION

ACTION DESK PERSONNEL ARE REMINDED THAT CERTAIN LOGS REQUIRE SPECIFIC INFORMATION AT THE INTAKE LEVEL IN ORDER TO PROPERLY ASSESS THE LOGS. FOR EXAMPLE:

VOUCHER NUMBERS - ANY LOG APPLYING TO VOUCHERS SUCH AS LOST OTHERS OR WHERE PROPERTY WAS ALLEGED TO HAVE BEEN VOUCHERED WILL INDICATE THE VOUCHER NUMBER ON THE LOG. ALSO, IF NO VOUCHER WAS PREPARED IT WILL BE NOTED IN LOG.

ARREST SITUATIONS - ALL LOGS IN WHICH REFERENCE IS MADE TO AN ARREST WILL HAVE AN O.L.B.S. PRINTOUT ATTACHED TO THE LOG.

COMMAND LOCATION - CORRECT COMMAND LOCATION WILL BE ENTERED IN THE PRECINCT AREA REGARDING LOCATION.

UPDATES - WILL NOT BE TAKEN ON CLOSED CASES. A NEW LOG WILL BE GENERATED AND A REFERENCE WILL BE MADE TO THAT CLOSED CASE. FURTHERMORE, THAT CASE (AS ANY OTHER CASE REFERRED TO) WILL BE ATTACHED TO THE LOG.

ADDITIONALLY, ANY COMPL/GROUP I/O CALLING WITH UNRELATED INFORMATION WILL NOT BE ADDED TO A PRIOR LOG/CASE SIMPLY BECAUSE THEY HAVE AN EXISTING LOG. THE ACTION DESK PERSONNEL RECEIVING INFORMATION WILL USE THEIR DISCRETION AS TO ADDING INFORMATION TO AN OPEN LOG/CASE OR GENERATING A NEW LOG.

MOS AS SUBJECTS - MOS ID'D AS SUBJECTS WILL BE ENTERED IN THE SUBJECT BOX OR NARRATIVE WHEN NECESSARY, AND A ROUND ROBIN/HISTORY CHECK OF MOS WILL BE PERFORMED, ALL C AND M CASE INVOLVING THE SUBJECT OFFICER(S) WILL BE ATTACHED TO IXLO COPIES OF THIS LOG.

CROSS REFERENCING LOGS - WHEN TAKING A LOG AND REFERENCE IS MADE TO A PRIOR LOG OR CASE, THAT LOG OR CASE WILL BE ATTACHED TO THE LOG. E.G. S.A.M. LOG, SUSPENSION WAS RESULT OF AN ONGOING INVESTIGATION INTO A C OR M CASE, COPY OF THAT LOG/CASE MUST BE ATTACHED TO IXLO COPIES OF THE S.A.M. LOG. NOTE: S.A.M. LOG REFERS TO SUSPENDED, MODIFIED, ARRESTED.

HOW TO ACCESS INFORMATION FROM SPRINT SYSTEM

BOROUGH CODES
"3" - BRONX
"4" - STATEN ISLAND
"5" - QUEENS
"6" - BROOKLYN
"7" - MANHATTAN

OBTAIN ADDRESS AS FOLLOWS:
24 HOUR RECAP OF SPRINT JOBS AT A SPECIFIC LOCATION

EXAMPLE: IS/7/315 HUDSON STREET, DEPRESS F14 KEY ON KEYBOARD
CURRENT STATUS AT LOCATION
EXAMPLE: IQ/7/315 HUDSON STREET, DEPRESS F14 KEY ON KEYBOARD

IF JOB NEEDED APPEARS ON 3RD LINE ON SCREEN, YOU BRING JOB UP BY ENTERING L;3 AND DEPRESS F14 KEY ON KEYBOARD. YOU CAN BRING UP ANY UNIT BY ENTERING PCT AND SECTOR ASSIGNED. FOR EXAMPLE: 14ST1 OR 14A AND DEPRESS F15 KEY ON KEYBOARD.

****ADDITIONAL INFORMATION REGARDING COMPUTER RELATED INQUIRIES****
FOR INFORMATION ON THE OPERATIONAL USE OF THE IAB IXLO AND PRIDE SYSTEMS, ACTION DESK INVESTIGATING OFFICER OR SUPERVISOR CAN REFER TO THE IAB PRIDE MANUAL OR THE IAD COMPUTER OPERATIONAL MANUAL.

Appendix B

Command Center Worksheet

INTAKE WORKSHEET

L. O. ____
L V. ____
IMP. ____
SAM ____
FND ____

DATE: _____

TIME: _____

LOG#: _____

Referral: _____
Rank Name Tax# Command

Compl. # _____ Command: _____ Voucher # _____ Permit # _____

Complainant: _____

Address: _____
Boro. CMD.

Hm. Tel. # ( ) _____ Bus. Tel. # ( ) _____

Witness(es): _____
Name Address Tel. #

_____
Name Address Tel. #

Place of Occurrence: Boro: _____ Pct. _____

Date From: _____ Time: _____

Date To: _____ Time: _____

Address: _____ Spec. Loc. (Apt. # Etc.): _____

Cross Street(s): _____

Subject Officer(s): _____
On Duty (Y/N): Rank Last First Command Sh.# Tax #
In Uniform (Y/N):

_____
Rank Last First Command Sh. # Tax #

COMPLETE ONLY IF M.O.S. IS UNIDENTIFIED

DESCRIPTION

Gender: (M/F): _____ Approx. Age _____

Race: _____ Color: _____

Approx. Height: _____ Build: _____

Facial Hair: _____ Length: _____
(Mustache, Sideburns, Goatee) (Bald,Short,Crew,Med., Long, Curly, Receding)

Veh. Used: (Y/N): _____ Unusual: _____
Description other

FOR NARRATIVE TURN PAGE OVER

REV. 9/25/97

INTERNAL AFFAIRS BUREAU
COMMAND CENTER

INTAKE WORKSHEET
(SIDE 2)

S.A.M. Log:

Time: _____ Location: _____ Auth.: _____ Tax #: _____

Dept. Adv. Notified: _____ Dept. Adv. # _____
Name

Narrative: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____ Received by: _____

(212) 741-8401 1(800) PRIDE-PD/774-3373 (212) CORRUPT/267-7878

(rev. 9/25/97)

Appendix C

IAB Procedure No. 620-01

INTERNAL AFFAIRS BUREAU GUIDE

INTAKE OF CORRUPTION ALLEGATIONS			
PROCEDURE NO.	DATE EFFECTIVE	REVISION NO.	PAGE NO.
620-01	01-04-95	95-1	1 OF 3

PURPOSE

To properly record allegations of corruption and/or serious misconduct.

SCOPE

Allegations of corruption may be received through the following source:

1. Telephone
2. In person
3. Mail
4. Chief of Internal Affairs
5. Other department commands
6. Civilian Complaint Review Board
7. Outside agencies

NOTE

In addition to recording allegations against members of this Department, logs will also be prepared for the following occurrences:

a. Allegation of corruption or serious misconduct against personnel from other city, state and federal agencies.
b. Lost, found, or recovered department property.
c. Member of the Service arrested, suspended, or placed on modified assignment.
d. Bribery and Controlled Pad situations.
e. Solicitations.
f. Police Impersonations.
g. Members of the Service involved in Family Offenses as described in P.G. 118-19.

PROCEDURE

Upon receiving a report of corruption or serious misconduct.

ACTION
DESK
INVESTIGATOR

1. Interview complainant/reporter.
2. Record call, on a cassette tape, which may be classified as a "C" (Corruption) or "M" (Misconduct) case received from a <u>civilian</u> complainant or MOS who is a complainant, or anonymous complaints.

NOTE

This recording is in addition to the Dictaphone tape which records all calls to the Action Desk.

3. Attempt to identify anonymous complainants, primary sources of information, witnesses, etc. However, if the complainant request to remain anonymous try to develop a rapport with the complainant. Request the complainant to contact the investigating officer and/or Action Desk with any additional information by utilizing the log number, rather than a name, as a means of identification.

NOTE

If name of subject officer is unknown, attempt to identify through Personnel File, SPRINT, DMV, Coles telephone directory, etc. If still unidentified, obtain detailed information regarding the subject's physical description, work hours, assignment, associates, auto, off-duty habits, and any other information that will assist follow-up investigators.

4. Use Member of the Service or Language Line, when necessary, to interpret calls from non-English speaking complainants.

5. Enter all relevant data into the computerized intake screens.

6. Include results of call outs, response of patrol units, update information in appropriate computerized intake screen.

7. Conduct computerized search on identified subjects which will include:
   a. active and closed cases in I.A.B. HISTORICAL data base.

8. Update existing logs when follow-up information is received.

9. Confer with Action Desk Supervisor regarding the need for an immediate response to the allegation received.

10. Forward all supporting documents (i.e. Complaint reports, letters, UF49's, etc.) for comprehensive assessment.

11. Rewind cassette tape, if used, remove from the tape recorder, label with the log number and tax registry number of the member accepting the call at intake, and forward for assessment.

NOTE

Only calls likely to generate a "C" or "M" case emanating from an anonymous, civilian or MOS complainant (not including an identified MOS calling in a routine notification) will be cassette taped, labeled, and forwarded to the Records Section of I.A.B. for confirmation and deposited in the I.A.B. mail box. The Action Desk Supervisor will ensure that all unlabeled tapes are erased prior to the completion of tour. Furthermore, CORRUPT and PRIDE PD telephone exchanges are not tape recorded. Therefore, whenever a complaint is received on the PRIDE PD or CORRUPT line, it should be indicated in the narrative portion of the log that the conversation was not recorded.

A NEW CASSETTE WILL BE USED FOR EACH CALL. UNLABELED CASSETTES MAY BE REUSED AFTER PREVIOUS RECORDINGS ARE ERASED.

ACTION DESK SUPERVISOR

12. Supervise and ensure that allegations of corruption and/or serious misconduct, are properly recorded.

13. Authorize the response of a Patrol Supervisor, Duty Captain, or Inspections Units, when circumstances warrant.

    a. If response by Patrol Supervisor or Duty Captain is required, the request may be made through the Communications Division Platoon Commander or Patrol Borough Command.

14. Confer with Group C.O.'s, I.A.B. Duty Captain or Nightwatch Supervisor when a call out of I.A.B. investigators is indicated, or when such call may be beneficial to this bureau, whether a specific request for a response had been made, or not.

Appendix D

6/11/96 Memo

File Under
ISD 029/96

Police Department
City of New York

June 11, 1996

From: Executive Officer, Investigative Support Division

To: Commanding Officer, Action Desk

Subject: ACTION DESK TELEPHONE MONITORING PROGRAM

1. In order to assure that the gathering of allegation information is done in the most professional manner, a monitoring program of the taped "Action Desk" calls is being established. The goal of this program is to have the Action Desk Commanding Officer and his subordinate supervisors monitor, through the review of taped conversations, the interaction of their personnel and the public. It is critical that the public be treated in a courteous and empathetic manner. We must strive to avoid even the appearance that our personnel discourage complaints. We also must assure, by asking the proper follow up questions, the greatest amount of information is gathered.

2. Utilizing the Log Summary generated by the Action Desk as a reference, supervisors will target in on calls which are indicative of interaction with the public. Action Desk Sgt's. will review at least five calls per week taken by various members of their platoon. The Commanding Officer of the Action Desk will likewise review a minimum of five calls per week from various platoons. It should be noted that while this is a training tool to improve performance, any serious discrepancies should be immediately corrected by the reviewing supervisors (e.g., update a log, make a missed notification etc.). Less serious discrepancies should be discussed with the member concerned, in private, to improve that person's performance. The fact that this consultation was made should be included on the "Comments " section of the Review Form.

2. In order to facilitate the organized monitoring of this telephone calls two new written forms have been instituted. The first form is an Action Desk Monitoring Report that will be filled out by the supervisor who is reviewing the tape. It lists such categories as Courtesy, Attentiveness, Length of Call, Accuracy of Allegations taken and Overall impression. They are to be rated on a scale from Well Below (being lowest) to Well Above Average(being highest).

Various other identifying data are included on the form. When the telephone call is reviewed information from the form should be entering into a hard covered log book. This book will be maintained by the C.O. of the Action Desk and will be the subject of periodic review by the undersigned. The review forms will also be filed at the action desk

3. For your information and compliance.

AP:ap

(NAME REDACTED)

Appendix E

10/11/94 Memo Re: Logs

Op. Memo
20 s. 94

POLICE DEPARTMENT
CITY OF NEW YORK

October 11,1994

From: Commanding Officer Operations Section

To: Operations Personnel

Subject: LOG PREPARATION IN AMBIGUOUS CIRCUMSTANCES AND ADMINISTRATIVE IMPROPIETIES-NON NYPD PERSONNEL

1. It has come to the attention of the undersigned that some calls that are received at the A/D fail to spell out specific acts of corruption/misconduct or intially sound ambiguous and consequently no IAB logs are prepared at the Action Desk.

2. On subsequent scrutiny however these ambiguous logs become allegations of corruption and matter for critique by higher echelons of this Department.

3. Therefore, the following guidelines will assist Action Desk personnel in determing if information reported to the IAB action desk warrants log preparation:

Prepare log:	Not Requiring Logs
1. Acts of misconduct	1. Strict CIVIL liabilities-no element of misconduct
2. Acts of corruption	
3. Criminal acts	
4. Information "that may contain" an element of malfeasance or non-feasance, administrative or Criminal against any member of the Criminal Justice system-even if only inferred.	

4. In the final analysis especially when in doubt you should prepare a IAB log and leave the main assessments to higher/authorized personel of this Bureau.

5. Inter-office calls received as overloads from the tapped lines to the PD Pride/Corrupt lines will be redirected to a tapped line after conferring with the tour supervisor.

6. For your information.

(NAME REDACTED)

Appendix F

CCPC Questionnaire

IAB ACTION DESK QUESTIONNAIRE

CALL IDENTIFICATION:

DATE: _____

TIME:

Begin _____

End _____

TRACK #: _____

OPERATOR: _____

LOG #: _____

Reviewer: _____
Date Reviewed: _____

NARRATIVE:

COMMENTS:

IAB ACTION DESK QUESTIONNAIRE

Background Information

1. Did the Action Desk officer identify self (name & rank)? Y N

2. Did the Action Desk officer attempt to ascertain identifying information about the caller if it was not provided:

Name?	Y	N	N/A
Address?	Y	N	N/A
Phone number?	Y	N	N/A

3. If the caller wanted to remain anonymous, did the Action Desk officer:

Explain the purpose of the caller identifying self?	Y	N	N/A
Attempt to trick the caller into providing identifying information?	Y	N	N/A
Discourage the caller from making the allegation if he/she continued to remain anonymous?	Y	N	N/A

Fact Gathering

4. Did the Action Desk officer let the complainant, in the first instance, tell his/her story without interruption (except for clarification)? Y N

5. Did the Action Desk officer ask questions about apparent contradictions and/or unclear information? Y N N/A

6. Did the Action Desk officer attempt to ascertain identifying information about the subject officer(s)?

Name(s)?	Y	N	N/A
Shield Number(s)?	Y	N	N/A
Physical Description(s)?	Y	N	N/A

7. When the complained conduct was not contemporaneous with the call, did the Action Desk officer find out why the caller was filing the complaint at that time? Y N N/A

8. Did the Action Desk officer restate or confirm the critical information provided? Y N N/A

9. Given the substance of the allegation, did the Action Desk officer attempt to gather all reasonably pertinent information? Y N

Inappropriate Questions Asked

10. Did the Action Desk officer ask any of the following about the caller:

Employment status?	Y	N
Race?	Y	N
Sex?	Y	N
Social security number?	Y	N

Administrative Actions

11. Did the Action Desk officer put the caller on hold without saying so? Y N

12. Was the caller on hold for more than 2 minutes at a single time? Y N N/A

13. Did the Action Desk officer transfer the call without explaining the reason for the transfer? Y N N/A

14. Did the Action Desk officer provide the name of the organization caller was transferred to? Y N N/A

15. Did the Action Desk officer provide the direct number of the organization caller was transferred to? Y N N/A

16. ▸Did the Action Desk officer transfer a call in which corruption or serious misconduct was alleged? Y N N/A

Log Information

17. ▸Did the Action Desk officer fail to assign the call a log number when one was required? Y N

18. Did the Action Desk officer give the assigned log number to the caller? Y N N/A

19. Did the Action Desk officer tell the caller to use the log number for future communication with the department? Y N N/A

20. ▸Does the identifying information in the log substantially correspond to the information elicited in the call? Y N N/A

21. Regarding the summary of the allegations in the log:

Did the Action Desk officer omit any allegations? Y N N/A

▸If yes, did these allegations involve corruption or serious misconduct? Y N N/A

Does the summary accurately reflect the substance of the allegation? Y N N/A

Non-English Speaking

22. If the officer was not able to communicate with the caller, did the Action Desk officer expeditiously find an interpreter for the caller? Y N N/A

Manner of Action Desk Officer

23. Did the Action Desk officer prematurely hang up on the caller? Y N DK

24. Was the officer argumentative regarding the legitimacy of the caller's allegation? Y N

25. Did the Action Desk officer try to discourage the caller from making an allegation? Y N

26. Did the Action Desk officer laugh at the caller? Y N

27. Did the Action Desk officer appear disinterested and/or unconcerned about the allegation? Y N

28. Was the conduct of the Action Desk officer at any time (pick all that apply):

Professional	Y
Unprofessional	Y
Courteous	Y
Discourteous	Y
Patient	Y
Abrupt	Y

29. Did the Action Desk officer blatantly misrepresent the Action Desk's function? Y N

Overall Impressions

30. Did the Action Desk officer create a comfortable and safe environment where the caller felt they could talk openly? Y N

31. Was the overall conduct of the Action Desk officer unprofessional, rude, and discourteous to the caller? Y N

32. Was the overall conduct of the Action Desk officer professional, polite, and understanding toward the caller? Y N

33. Was the overall interaction with the caller beyond any acceptable standard of decency? Y N