

**508.00 – PERSONNEL ASSESSMENT SYSTEM (PAS)****508.01 Personnel Assessment System (PAS) Policy**

- (1) The Personnel Assessment System (PAS) is a Denver Police Department program created to increase police accountability and reduce department liability through a system of recognition and intervention. The goal of PAS is to enhance the success of Denver Police officers by identifying individual performance problems followed by the application of intervention techniques designed to improve performance as well as by providing positive reinforcement through recognition of exceptional effort.
- a. Definitions:
1. **PAS** — PAS is a non-disciplinary process used to identify and address performance issues early in their development and exemplary performance that may not normally be identified. PAS relies primarily on supervisor observation and input, and is complemented by a computer program that draws information from existing databases of incidents such as commendatory actions, uses of force, and citizen complaints.
  2. **PAS Board** — The PAS Board is an advisory committee to the Chief of Police created to discuss reviews, referrals, intervention plans and the on-going direction of the overall PAS program. The Board shall be comprised of various stake-holders such as managers, supervisors, officers, labor representatives, a citizen representative, and peer support members.
    - a. Each board member selected for the PAS Board shall be a member for two (2) years from the date of his or her selection. One-half (1/2) of the members of the board shall be replaced on an annual basis.
    - b. Reviews generated by a Review Limit may be referred to a committee staffed by members of PAS Board, selected by the Chief of Police, to assist in determining the assignment of an appropriate Response Level as describe in this policy.
    - c. All PAS Board members will make every effort to identify and recognize high performing officers throughout the Department. For example, recognition may include a nomination for recognition by the Chief of Police or other Department or community awards or commendations. The Professional Standards Unit will assist the PAS Board in facilitating officer recognition.
    - d. The PAS policy, PAS Board membership, program administration, and final decisions concerning intervention will be at the discretion of the Chief of Police.
  3. **Referral** — A referral is a direct recommendation made into the PAS program. Recognizing the need for the human element in employee success, referrals may be made by managers, supervisors, peers, family, or friends. In addition, concerned officers may self-refer. Referrals may be based on information discovered in PAS data sources, personal observations, or knowledge of other circumstances that could have an adverse effect on officer performance. Referrals may be made directly to the Professional Standards Unit (PSU) or to any other supervisor or command officers who will bring the referral to the attention of PSU.
  4. **Review** — A Review of an officer's performance and conduct may occur as a result of several circumstances and will be based on the totality of the circumstances. For example, a Review may be initiated as a result of a single IAB investigation, a single complaint coupled with other performance issues, a possible pattern of complaints or misconduct, or by reaching established Review Limits. A Review may involve a management or supervisory examination of all available information pertaining to officer(s) that may or may not indicate a need for intervention. The goal of the Review is to determine whether any level of intervention is needed to assist the officer.
  5. **Review Limits** — Review Limits determine the number or frequency of incidents tracked in the PAS computer program that may warrant a review. Review Limits may be adjusted periodically by the Chief of Police in consideration of PAS Board recommendations. Review Limits will be made public to all officers, however, officers must realize that reaching a Review Limit may not result in any subsequent in-depth Review nor an intervention due to safeguards built into the review and this policy. Review Limits may indicate performance problems or exemplify high performance.

- a. Review Limits are meant to prompt an examination of an officer's performance that may indicate a disparity compared to similarly situated officers. Review Limits are meant to be practical and reasonable. (For example, while all complaints will be available for management review, due consideration will be given to complaints that were declined by IAB, resolved through mediation and those that are exonerated, unfounded and not sustained.) Due consideration will also be given to the particular assignment and working environment of the concerned officer. While all Use-of-Force incidents will be available for management review, consideration will be given to the particular circumstances of each incident such as type of force used and suspect behavior.
  - b. Not all performance data available in the PAS system will have a related Review Limit. Conversely, meeting or exceeding Review Limits is not a requirement for the generation of a PAS response or a Review. The identification of effective Review Limits is an on-going process impacted by the availability of performance-related information, technology, and the proper identification of indicators of officers with both performance problems and exemplary performance.
6. **Response Level** — The Response Level will be based on each particular PAS Review or Referral. Response Levels are intended to improve officer performance and are not a disciplinary action.
- b. There are four possible levels of response that may be applied to a review:
    - 1. Level Zero-No Response
    - 2. Level One-Notification
    - 3. Level Two-Response
    - 4. Level Three-Intervention

#### 508.02 Procedures for PAS Review or Referral

- (1) PAS information is confidential and will not be disseminated to unauthorized persons, either internally or outside the Department. Individual users are responsible to maintain the security of the PAS computer program. PAS may not be used for personal use or gain, and misuse of PAS may result in discipline.
- (2) PAS printouts may be referred to as needed; however, they shall not be attached to evaluations or any other reports including IAB investigations.
- (3) Individual officers are encouraged to review their own PAS computer system information on a frequent basis. Reviewing PAS information allows the officer the opportunity to ensure the accuracy of PAS data and to monitor multiple performance indicators. An officer who finds data that they believe is inaccurate should inform their immediate supervisor of the records in question. The supervisor will then contact the PSU with a description of the possibly inaccurate data. The PSU will cause the record in question to be corrected when appropriate and inform the officer and the supervisor of the outcome.
- (4) Regardless of the origin of a Review of an officer's performance under this policy, one of the Response Levels detailed below will be used:
  - a. **Level Zero – No Action:** The totality of the information does not support the notion that the officer's performance is outside a desired range.
  - b. **Level One – Notification:** Based on the totality of the information available, the issue is of such a nature as to necessitate notification of the officer's commander. The commander will be provided any information prepared by PSU, and will decide whether any action should be taken or if the officer's input should be sought in order to identify ways to improve performance. Documentation of this Level One response will be at the discretion of the officer's chain-of-command.
  - c. **Level Two – Response:** Based on the totality of the information available, the issue is of such a nature as to necessitate the notification of the officer and their commander. The officer's commander will perform the notification of the officer.
    - 1. The commander will coordinate with PSU to identify any appropriate resources to which the officer may be referred.
    - 2. The officer's input will be sought in order to identify an informal response plan that will help correct any possible deficiencies.

3. The commander will provide a brief written explanation to the Division Chief, within fourteen (14) days of receipt of the notice, detailing their actions. A copy of all documentation generated as a result of a Level Two response will be sent to PSU for monitoring and inclusion in their records.
- d. **Level Three – Intervention:** Based on the totality of the information available, the issue is of such a nature as to necessitate a formal intervention, which includes a written plan. The officer's commander will perform the notification of the officer.
  1. The commander will coordinate with PSU to identify any appropriate resources to which the officer may be referred.
  2. The commander will coordinate with their Division Chief and PSU to determine the appropriate form of intervention.
  3. The officer's input will be sought in order to help determine a course of action that will help to correct any possible deficiency.
  4. The commander will provide a written response to the Chief of Police through the chain of command within fourteen (14) days of receipt of the notice. The response will include a written remedial plan detailing the efforts being made to correct any performance and conduct issues of concern. The remedial plan will be signed by the officer indicating that the response has been reviewed. The officer's progress must be monitored and formally reported to the Chief of Police or his designee at intervals prescribed by the Department.
  5. A copy of all documentation generated as a result of a Level Three response will be sent to PSU for monitoring and inclusion in their records.

#### **508.03 Intervention Strategies**

- (1) Appropriate intervention strategies may include:
  - a. Referral to Peer Support, Psychological Services, Police Chaplain, Employee Assistance Program, or other appropriate employee support system.
  - b. Non-disciplinary coaching or direction by the officer's supervisor, developing a monitoring program or a follow-up plan, or encouraging the officer to help the supervisor determine the best intervention option for the situation.
  - c. Mandatory Department authorized training, targeting personal or professional problems that the officer may be facing (e.g., communications, cultural awareness, coping with stress, anger management, or skills training such as remedial driving, arrest control techniques, etc.).
  - d. Reassignment or transfer.
  - e. Recommending policy revisions or additions, or Departmental training needs.
- (2) Participation in a PAS response is mandatory.
- (3) The Department's provision of training, counseling, support, and other services under this policy does not in any way diminish the officers ultimate responsibility for their performance, including the correction of any identified performance deficiencies.
- (4) Nothing in this policy should be construed to suggest that a PAS intervention is a replacement for the Department's disciplinary procedures.

#### **508.04 Roles and Responsibilities**

- (1) Professional Standards Unit Responsibilities
  - a. PSU is responsible for establishing and administering PAS and generating reports specified in this policy, as requested by a commanding officer for personnel under their command, or as otherwise directed by the Chief of Police.
  - b. PSU coordinates with Psychological Services, Peer Support, the Training Bureau, the City Employee Assistance Program, and other available services to develop effective intervention strategies. The purpose of the intervention is to enhance employee success by addressing behavior before the conduct becomes more serious or becomes a disciplinary issue.

- c. Whenever a Referral or Review is initiated PSU will prepare documentation for review by the Chief of Police or his designee in order to determine the appropriate level of response. Reviews generated by a Review Limit may be referred to a committee staffed by members of the PAS Board, selected by the Chief of Police, to assist in determining the assignment of an appropriate Response Level as describe in this policy.
- d. At a minimum, PSU will produce a monthly, quarterly, semi annual and annual report detailing officers who have reached a Review Limit. The PSU will recommend to the Chief of Police which officers may be taken forward for review by the PAS Board subcommittee so a Review Level can be determined.
- e. PSU will monitor the officer's progress on all Level Two Responses and Level Three Interventions.
- f. PSU draws no conclusions concerning the generated reports. Officer review reports are intended to assist command and supervisory personnel in the evaluation and guidance of their subordinates. PSU may provide comparison information and other data to help commanding officers develop a reasonably consistent cross-departmental implementation of the Personnel Assessment System.
- g. PAS reports alone shall not form the basis for disciplinary action.
- h. All personnel assigned to PSU will make every effort to identify and recognize high performing officers throughout the Department. For example, recognition may include a nomination for recognition by the Chief of Police or other Department or community awards or commendations.

(2) Command Officer Responsibilities

- a. Command officers will continually examine areas of the police operation under their purview and must assume the duties and obligations of their ranks in the assessment and correction of performance deficiencies of their subordinate officers. A command officer must not look to higher authority to take corrective action when performance deficiencies are detected.
- b. Command officers shall take proactive measures to identify performance deficiencies of personnel under their supervision and develop and implement effective interventions to correct any performance or behavioral issues.
- c. Command officers must monitor PAS and identify subordinate personnel within their command who exhibit problematic performance or conduct.
- d. Command officers are required to review the PAS information for the supervisors under their command at least once a month. The command officer must ensure that such supervisors are reviewing the PAS information of the officers under their span of control once per month to make certain that no issues have gone unrecognized.
- e. When a command officer has identified a subordinate who may need a review, the command officer will gather the necessary documentation. PSU may be called upon for assistance.
- f. For Level Two and Level Three responses, PSU shall be notified.
- g. At a minimum, during the monthly review of PAS data, command officers and supervisors will make every effort to identify and recognize high performing officers under their command. For example, forms of recognition may include Supervisor Situation Report (SSR) entries for exceptional or commendatory performance, public recognition within individual commands for high performance or other Department or community awards or commendations.

(3) Supervisory Officer Responsibilities

- a. Supervisory officers will continually examine areas of the police operation under their purview, and must assume the duties and obligations of their ranks in the assessment and correction of performance deficiencies of their subordinate officers. Supervisory officers must not look to higher authority to take corrective action when performance deficiencies are detected.
- b. Supervisors shall take proactive measures to identify performance deficiencies of personnel under their supervision and develop and implement effective interventions to correct any performance or behavioral issues.
- c. All supervisory officers are required to review the PAS information for the officers under their span of control a minimum of once a month. Supervisory review of PAS is also required during preparation of officer performance evaluations.
- d. When a supervisory officer has identified a subordinate who may need a review, the supervisor will gather the necessary documentation. The supervisor will then make a determination of the level of response required or will refer the review to the appropriate chain of command.

- e In the event a Referral or Review is not completed prior to the transfer of an affected officer to a new assignment, the transferring supervisor must make sure that sufficient information, including written documentation, is furnished to the new supervisor so that the process is successfully completed.
- f Nothing in this policy precludes a supervisor from intervening with an officer before a referral is made or a review is initiated. Through personal observation and available performance data the PAS program can best be utilized by supervisors to identify opportunities to improve officer performance.
- g At a minimum, during the monthly review of PAS data, command officers and supervisors will make every effort to identify and recognize high performing officers under their command. For example, forms of recognition may include Supervisor Situation Report (SSR) entries for exceptional or commendatory performance, public recognition within individual commands for high performance or other Department or community awards or commendations.

