

Miami Police Department 1st Self-Assessment Compliance Report		
Settlement Agreement Requirement	Compliance Rating	Comments

II. Policy Review and Implementation			
Responsible Party: Major Roman Martinez (PCS), Major Lazaro Ferro (Training). Point of contact: Lt. Chris Griffin (PCS), Sgt. Orlando Villaverde (PCS), George Wysong, (police legal), Ms. Segura Washington (Training).			
#27	MPD will continue to develop and implement policies on constitutional policing principles and best practices. In addition, MPD agrees to maintain (and develop if necessary) comprehensive, agency-wide policies and procedures that reflect full implementation of every requirement of this agreement.	Substantial Compliance	MPD has revised procedures within the three months of the entry into the agreement with DOJ. MPD will continue to implement policies based on constitutional policing principles and best practices. In addition, MPD maintains the policies of the Policy Review Committee (PRC), the Professional Compliance Section (PCS), the High Liability Review Board (HLB), the Major Case Team for shooting investigations, the Tactical Operation Section (TOS), the Community Relations Section, and other initiatives MPD intended to ensure compliance with the DOJ Agreement.
#28	Within one month of the entry of this agreement, MPD will submit an action plan to DOJ for the implementation of this entire Agreement, including designation of staff responsible for implementing the provisions.	Substantial Compliance	MPD submitted its action plan on April 10, 2016 to the DOJ and the Independent Reviewer.
#29	By June 10, 2016, MPD agrees to submit any new and revised policies, procedures and manuals, if any, created or revised to achieve compliance with the Agreement to DOJ for review and comment prior to publication and implementation. DOJ shall	Substantial Compliance	MPD has reviewed its current polices in order to identify areas that need revision or creation. On June 10, 2016, MPD submitted to the Independent Reviewer five procedure revisions from Homicide, Internal Affairs, Training and the Tactical Operations Sections.

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	complete its review within one month. If MPD and DOJ disagree on an aspect of a policy that is relevant to this Agreement, the Independent Reviewer shall resolve the dispute.		
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#30	All staff responsible for implementing the policies shall be trained on the new or revised policies and procedures as soon as practicable, but not later than March 10, 2017. MPD shall maintain documentation sufficient to demonstrate (a) the status and completion of staff training requirements and (b) that staff are aware of the requirements of all policies and procedures. In addition, MPD will continue to disseminate any new or revised policies related to this Agreement through roll call briefings and official bulletins.	Substantial Compliance	From May 11, 2016, through June 8, 2016, Major Martinez conducted mandatory training to the staff on the DOJ Agreement. MPD staff members were provided with a copy of the agreement. A log of the DOJ agreement training was signed by the members that attended the training. In addition, MPD is also in the process of continuing to disseminate further training related to the Agreement through the command staff.
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III. Officer-Involved Shooting Investigations

Responsible Party: Major David Sanchez (IA), Major Lazaro Ferro (Training), Major Roman Martinez (PCS).
Point of contact: Major Lazaro Ferro (Training), Lt. Oriel Tameron (IA), Attorney George Wysong (Police Legal) Sgt. Michael Angelo Rojas (PCS).

#32	MPD will continue to insure that each Critical Firearms Discharge will be review for accountability, legality, training, tactics and equipment issues.	Substantial Compliance	MPD ensures that each critical firearm discharge is reviewed for accountability, legality, training, tactics and equipment.
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#33	Officers required to cooperate with investigations.	Substantial Compliance	MPD continues to require officers to cooperate with all administrative investigations. Additionally, we have fortified this area by requesting the principal officer(s) to provide any and all documents and evidence relating to the investigation. This has been added to the
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			"Notification of Principal Officer" form.
#34	Providing shooting officers opportunity for voluntary statements.	Substantial Compliance	MPD continues to provide shooting officers the opportunity to give voluntary statements as soon as practicable after each shooting. This has being fortified in the revised Internal Affairs SOP 21, VII, Subsection F, which will be provided to officers involved in a discharge of firearm.
#35	Potential criminal investigation or prosecution, MPD to continue its efforts to complete administrative investigation.	Substantial Compliance	MPD will continue its efforts to complete the administrative investigation. Additionally, MPD will consult with FDLE and SAO on appropriate interviews of principal officer during the administrative investigation. MPD efforts will facilitate prompt determination of the case. Revisions to the Homicide and Internal Affairs SOP's have been made to fortify this effort.
#36	Complete administrative investigation within 180 days	Substantial Compliance	MPD will not permit full resolution of an administrative investigation to extend beyond 180 days after the conclusion of the criminal case, absent exigent circumstances. MPD has fortified this resolution in the Internal Affairs SOP's.
#37	MPD ensuring that MPD officer involved in a shooting not be returned to active duty until requirements is accomplished: a. Return to duty: psychologist clearance b. Return to duty: post shooting briefing by FDLE c. Return to duty: C.O.P approval	Substantial Compliance	MPD will continue to ensure that an officer involved in a shooting will not be returned to active duty until a clearance is conducted by a psychologist, post shooting briefing by FDLE, C.O.P. approval, evidence review and refresher training is provided, if needed or requested by the COP. A "Return to Duty"

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	<p>d. Return to duty: evidence review</p> <p>e. Return to duty: refresher training</p>		<p>memorandum has been created, and a revision to the Internal Affairs's SOPs has been implemented to fortify this requirement.</p> <p>In addition, A "Post Traumatic Incident Memorandum" has been created to administratively reassign officers involved in a category 3, 4 or 5 Firearm Discharge. The intent is continue to provide temporary administrative reassignment and counseling session, as well as, emotional well-being for the affected officer.</p>
#38	Maintain Incident Tracking System (ITS)	Substantial Compliance	<p>MPD will continue to maintain its Incident Tracking System (ITS) for officer involved shootings and monitor opportunities for officers to engage in misconduct and bring corrective actions. In addition, an incident tracking memorandum has been created in order to fortify that each section commander receiving an ITS report adheres to the procedures of complying with the review process.</p>
#39	<p>MPD will maintain the Professional Compliance Section (PCS), which reports directly to the Chief of Police (COP). Maintain the High Liability Incident Review Board (HLB), and continue reviewing serious uses of force and pursuits</p>	Substantial Compliance	<p>MPD will maintain the High Liability Incident Review Board (HLB), and will continue reviewing high liability incidents including serious uses of force and pursuits. In addition, PCS has tentatively scheduled HLB's for the calendar year of 2016.</p>
#40	Firearm Review Board	Substantial Compliance	<p>MPD continues to have the Training Section Commander participate in the Firearms Review Board (FRB) as a sitting staff member who is overseeing whether training deficiencies are</p>

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		<p>observed. MPD has developed an effective mechanism to ensure that lessons learned from officer-involved shootings are incorporated and verified into policy and officer training. Additionally, MPD ensures that in the post shooting meeting any training or policy deficiency is addressed.</p>
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IV. Supervision

**Responsible Party: Assistant Chief Jorge Colina (FOD), Major Alberto Alberto (TOS)
 Point of contact: Captain Alberto Borges (FOD), Lt. Gilberto Gomez (TOS), Sgt. Alejandro Mendez (FOD).**

#41	<p>MPD first line supervisors shall provide, and shall be held accountable for providing, the close and effective supervision necessary to direct and guide officer, as described in Departmental Orders 11 (Patrol), Departmental Order 6 (Use of Force) and other relevant Departmental Orders, standard operating procedures and established guidelines.</p>	Substantial Compliance	<p>MPD ensures first line supervisors provide, and are held accountable for providing, the close and effective supervision necessary to direct and guide officers, as described in Departmental Orders, 11 (Patrol), Departmental Order 6, (Use of Force) and other relevant Departmental Orders, Standard Operating Procedures and established guidelines. Additionally, MPD DO 11, Chapter 1.5.8 provides supervisory responsibilities to include; directing, coordinating and monitoring subordinate activities.</p>
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#42	<p>MPD will continue the practice of assigning all patrol officers and officers in the Tactical Operations Section units to a single, consistent, clearly identified first-line supervisor. First line supervisors will continue to be assigned to and actually work the same days and hours as the officers they are assigned to supervise, absent extenuating circumstances.</p>	Substantial Compliance	<p>MPD will continue assigning all patrol officers and officers in the units of the Tactical Operations Section to a single, consistent, clearly identified first-line supervisor with the same days and hours as the officers they are assigned to supervise. The assignment of supervisors assigned to patrol remains at 72. These first line supervisory slots are assigned to supervise a maximum of seven officers with</p>
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			<p>the same days and duty hours. In TOS, the Tactical Robbery Unit has one sergeant to supervise six officers. The Felony Apprehension Team has one sergeant to supervise three officers. Both sergeants have the same days and duty hours as the officers they supervise. SWAT has one sergeant to supervise eight officers with the same days and duty hours.</p>
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#43	<p>First-line supervisors of patrol officers and officers assigned to Tactical Operations Section units shall be assigned to supervise no more than five to eight officers (“span of control”). The span of control will be based on the nature of the duties that any officer or group of officers performs. On-duty first-line supervisors will be available throughout their shift to respond to the field to provide supervision to officers under their direct command and, as needed, to provide supervisory assistance to other units.</p>	Substantial Compliance	<p>MPD ensures compliance by providing a span of control with no more than eight officers to one sergeant in patrol and the Tactical Operations Section as reflected in the DOJ Agreement.</p>
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#44	<p>The City and MPD shall continue to assess the current span of control within three months of the effective date and re-assess every four months after implementation, and shall retain the number of supervisors necessary to achieve the required span of control subject to the limitations set forth in the collective bargaining Agreements and civil service rules.</p>	Substantial Compliance	<p>MPD assessed the current span of control prior to June 10, 2016, and has determined that the span of control is in compliance with the DOJ Agreement. MPD will continue re-assessing every four months in accordance with the DOJ Agreement. MPD will ensure to retain the number of supervisors necessary to achieve the required span of control subject to the limitations set forth in the Collective Bargaining Agreements and Civil Service Rules. In addition, staffing charts</p>
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			are reviewed and compared against current vacancies to ensure that no vacancies remain unfilled for first line supervisors for longer than six weeks.
#45	MPD shall continue to ensure consistent supervision by first-line supervisors who are on extended leave, and shall reassign officers to a first-line supervisor when the currently assigned first-line supervisor has been or is expected to be absent for longer than six weeks.	Substantial Compliance	MPD has ensured consistent supervision by first-line supervisors for supervisors who are on extended leave, and shall reassign a first-line supervisor when the currently assigned first-line supervisor has been or is expected to be absent for longer than six weeks. In addition, staffing assignment charts are monitored and compared against current vacancies to ensure that no supervisory vacancies remain unfilled for longer than six weeks.
#46	Captains and Lieutenants will continue to closely and effectively supervise the first line supervisors and officers under their command. MPD captains and lieutenants will continue to ensure that all first line supervisors and officers under their command comply with MPD policy, state and federal law, and the requirements of this Agreement.	Substantial Compliance	MPD ensures that Captains and Lieutenants supervise the first-line supervisors and officers under their command and ensure that all first-line supervisors and officers under their command comply with MPD policy, state and federal laws and the DOJ Agreement. In addition, the Training Section has developed a training curriculum referred to as Miami Agreement Training (MAT) and Miami Agreement Supervisory Training (MAST) courses that will fortify this section of the Agreement.
#47	MPD will continue to ensure that captains and lieutenants at	Substantial Compliance	MPD ensures that Captains and Lieutenants at any level are held

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	<p>any level are held accountable for the quality and effectiveness of their supervision, including whether captains and lieutenants identify and effectively respond to uses of force or misconduct, as part of their performance evaluations and through non-disciplinary corrective action, or through the initiation of formal investigation and the disciplinary process. Supervisors shall be subject to discipline for failure to report and remedy misconduct they knew or reasonably should have known occurred. MPD shall continue to develop and implement metrics to assess supervisors' performance.</p>		<p>accountable for the quality and effectiveness of their supervision, including the identification to effectively respond to uses of force or misconduct, as part of their performance evaluations and through non-disciplinary corrective action, or through the initiation of formal investigation and the disciplinary process. MPD also ensures supervisors shall be subject to discipline for failure to report and remedy misconduct they knew or reasonably should have known occurred. In addition, the Training Section has developed a training curriculum referred to as "MAT" and "MAST" courses that will fortify this section.</p>
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V. Specialized Units

**Responsible Party: Major Alberto Alberto (TOS).
Point of contact: Lt. Gilberto Gomez (TOS) Lt. Eric Gonzalez (SWAT).**

#48	<p>Provide Criteria for Specialized Unit A. Recruitment/selection B. Eligibility C. No Eligibility D. Monitoring</p>	Substantial Compliance	<p>On May 10, 2016, MPD provided DOJ with the criteria for recruitment and admission to MPD's specialized TOS units. The report included an interoffice memorandum from unit commanders of TOS, to the Assistant Chief of the Administration Division, detailing the criteria for recruitment and admission to the SWAT school and the Tactical Robbery Unit. MPD Official Bulletins, dated February 2, and 9, 2016, were published with the eligibility criteria of personnel assigned to the SWAT and Tactical Robbery Unit of TOS. Additionally, the criteria relating to recruitment/selection, eligibility</p>
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			and monitoring were also included in the TOS revised SOPs in order to fortify this section.
#49	Ensure TOS Protocols are consistent with agency use of force	Substantial Compliance	MPD will continue enforcing the operating protocols consistent with the use of force policy. The criteria relating to the agency's use of force were included in the TOS revised SOPs in order to fortify this section.
#50	Prohibit SWAT from conducting General Patrol	Substantial Compliance	MPD will continue to prohibit SWAT units from conducting general patrol and policing functions while they are on a specialized assignment. Both officer and supervisory decisions will adhere strictly to SWAT operational protocols during deployment. In addition, the criteria relating to prohibiting SWAT from conducting general patrol will be included in the SWAT policy revision in order to fortify this section.
#51	TOS document all LEO activities in writing: A. Operational Plan B. After action reports C. Callouts/deployments D. Daily, weekly and monthly reports	Substantial Compliance	MPD will continue to require officers assigned to TOS units while on specialized assignment to document in writing all law enforcement activities, including Operational Plans and After Action Reports in a consistent format for call-outs and deployments. Supervisors shall conduct documented regular reviews of TOS's law enforcement activities to ensure their compliance with applicable laws and MPD policies and procedures. The criteria relating to TOS documentation of all LEO activities were included in the TOS revised SOPs.

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#52	Track, analyze and address violations by TOS members A. Report on success and challenges/recommendations B. Transferring individuals/initiating disciplinary action	Substantial Compliance	MPD will continue to track, analyze and take appropriate action, if necessary, to address tactical deficiencies or policy violations by TOS members, including reports on success and challenges, recommendations, transferring of individuals and or initiating disciplinary action as necessary. The criteria relating to the agency tracking, analyzing and addressing violations by TOS members were included in the TOS revised SOPs.
VI. Training			
Responsible Party: Major Lazaro Ferro (Training), Attorney George Wysong (Police Legal). Point of contact: Ms. Segura Washington (Training), Attorney George Wysong (Police Legal).			
#53	Deliver any new training expressly required by the terms of the DOJ agreement within one year of the effective date of 03/10/2016, and annually thereafter. A. New training delivered by deadline of 03/10/2017. B. Submit comprehensive training delivery schedule by deadline 07/10/2016. Tracking, delivery and completion of all required training by deadline of 03/10/2017	Substantial Compliance	On May 25, 2016, MPD developed new training consisting of a yearly training program in order to comply with this requirement. The training program schedule for the upcoming year referred to as Miami Agreement Training (MAT) will include use of force scenario based training, Meggit System Lesson plan and firearms range lesson plan for officers. Additionally, from the rank of Sergeant up to the rank of Police Captains, the creation of Miami Agreement Supervisory Training (MAST) will have a similar curriculum in order to meet the DOJ requirements for supervisors. In addition, this criteria relating to the delivery of new training was included in the Training Section revised SOPs.
#54	Firearm Training Program provides for the following: A. Requires officers to pass training and qualify on each firearm the officer is	Substantial Compliance	The Training Section developed an annual firearms training program through MAT and MAST for officers and supervisors from the rank of sergeants up to

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<p>required or authorized to carry out on an annual basis.</p> <p>B. Immediately comply with and reinforce judicial developments in use of force.</p> <p>C. Firearm Annual in Service training</p> <p>(1) Training on when to display/or point firearms.</p> <p>(2) Night training.</p> <p>(3) Stress training (undergoing physical exertion).</p> <p>(4) Use of Force decision-making (shoot-don't shoot) training.</p> <p>(5) Continuous threat assessment techniques.</p> <p>(6) Observe students and provide corrective instruction when deficiencies are observed.</p> <p>D. Observe students and provide corrective instruction when deficiencies are observed.</p> <p>E. Comprehensive testing on rules, regulations and skills regarding firearm use.</p> <p>F. Employ reality based incident scenarios</p> <p>1. Live action</p> <p>2. Computer simulated components to improve defensive tactic training, limit incident of deadly force</p> <p>G. Incorporate de-escalation training and techniques</p> <p>H. Evaluation and Survey</p>		<p>captains. The Training Section has established the program using the Meggit system scenario based training system through the use of computer simulated system, as well as firearm proficiency as it pertains to the DOJ Agreement outlined in this provision, to include all full time officers and part time auxiliary officers. Additionally, MPD has contracted with Florida International University to conduct cultural diversity and de-escalation training. In addition, this criteria relating to the delivery of the new firearms annual in-service training was included in the Training Section's revised SOPs.</p>	
#55	MPD will continue providing mandatory training to new first-	Substantial Compliance	MPD provides mandatory supervisory training to officers

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	line supervisors to be completed prior to assuming supervisory responsibilities		prior to assuming first line supervisory responsibilities. In addition, MPD will use another training facility approved by FDLE, in providing first line supervisory training in the event a class is not offered at the MPD facility.
#56	Provide mandatory training for all new second-line supervisors (Lieutenant and Captains) to be completed prior to assuming secondary supervisory responsibilities	Substantial Compliance	MPD provides mandatory second line supervisory training prior to assuming Lieutenant and Captains responsibilities. In addition, MPD will use another training facility approved by FDLE, in providing second line supervisory training in the event a class is not offered at the MPD facility. In addition, the criteria relating to the delivery of new second-line supervisory training was included in the Training Section's revised SOPs.
#57	Provide first line supervisors with 40 hours of annual in service training based on developments in applicable law and MPD policy. This training curriculum shall include the following topics related to Critical Firearm Discharges.	Substantial Compliance	The Training Section developed an annual mandatory training program for all first line supervisors referred to as Miami Agreement Supervisory Training (MAST). All sergeants are mandated to complete the 40 hours of the DOJ Agreement required annual training. In addition, the criteria relating to the delivery of new first-line supervisory training was included in the Training Section's revised SOPs.
#58	Provide all Lieutenants and Captains with in service training on an annual basis based on developments in applicable law and MPD policy.	Substantial Compliance	The Training Section developed an annual mandatory training program for all second line supervisors referred to as Miami Agreement Supervisory Training (MAST). All lieutenants and captains are mandated to

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		complete the 40 hours of the DOJ Agreement required annual training. In addition, the criteria relating to the delivery of new second-line supervisory training was included in the Training Section’s revised SOPs.
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VII. Community Oversight

**Responsible Party: Captain Sean MacDonald (IT); Attorney George Wysong (Police Legal Advisor).
Point of contact: Sgt. Alex Rodriguez (IT).**

#59.	<p>City and MPD will have a community advisory board of civilian City residents to provide oversight and feedback to MPD and the independent reviewer. The board will address concerns to:</p> <ul style="list-style-type: none"> A. Advise the Chief, majors and commanders on strategies and training to improve community relations and MPD responsiveness. B. Work with the Chief, majors and commanders to establish and carry out community public safety priorities; C. Provide the community with information on the agreement and its implementation. <p>Receive and convey to MPD and DOJ public comments and concerns, in addition to MPD’s civilian complaint system.</p>	Partial Compliance	The City and MPD adopted a resolution for a Community Advisory Board (CAB). This issue was finalized by the City Commission on April 28, 2016.
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#60	<p>The community advisory board will be in effect within three months of the effective date. The City will establish the number of members and a mechanism to ensure that membership is representative of a cross section of communities in the City of Miami to including; districts, faith communities,</p>	Partial Compliance	The City and MPD created a Community Advisory Board made up of residents to provide oversight and feedback to MPD and the independent reviewer. The City Commission has finalized this resolution on April 28, 2016, and further discussion on the selection of board members will be on-going until
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	<p>minority, ethnic, and other community organizations, and student or youth organization. The City shall set a date by which board members will be selected.</p> <p>The community advisory board will be in effect within three months of the effective date (March 10, 2016). The City will establish the number of members and a mechanism to ensure that membership is representative of a cross section of communities in the City of Miami to include:</p> <ul style="list-style-type: none"> A. District B. Faith C. Communities D. Minority E. Ethnic F. Community organizations G. Students <p>Youth organizations</p>		<p>all members have been selected. Upon selection of all board members, the Community Advisory Board will be in full operational status.</p>
#61	<p>MPD facilitate regular public meetings of the community advisory board to discuss DOJ's reports, if any and to receive community feedback about MPD's progress or compliance with the agreement.</p>	Partial Compliance	<p>Once the CAB is fully established and operational, MPD will ensure and facilitate public meetings are held to discuss DOJ reports in order to receive community feedbacks.</p>
#62	<p>The community board's reports and recommendations will be posted on MPD website. MPD will consider and respond to the community board's recommendations in a timely manner.</p>	Substantial Compliance	<p>MPD created a CAB web page link that is posted on the MPD website and will be continuously updated as information becomes available.</p>
#63	<p>The City will provide the community board with reasonable administrative</p>	Partial Compliance	<p>The City will provide the Community Advisory Board with reasonable administrative</p>

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	support, including meeting space.		support, including meeting space once the CAB is fully established.
#64	The civilian community board will not review or report on specific cases of alleged misconduct, review or comment on discipline, and will not seek to influence the course or outcome of a specific complaint investigation or the discipline of specific officers. The community board will not have access to any non-public information regarding an individual officer or allegation of misconduct or disciplinary action.	Partial Compliance	The civilian community board will not review or report on specific cases of alleged misconduct, review or comment on discipline, and will not seek to influence the course or outcome of a specific complaint investigation or the discipline of specific officers. The community board will not have access to any non-public information regarding an individual officer or allegation of misconduct or disciplinary action.
#65	The City may use the Community Relations Board to fulfill the requirements of this Section of the Agreement if they are able to meet the requirements herein.	N/A	N/A
VIII. Compliance Assessment			
Responsible Party: Major Roman Martinez (PCS).			
Point of contact: Lt. Chris Griffin (PCS), Sgt. Orlando Villaverde (PCS).			
#66	Within 45 days of the effective date, MPD will identify a compliance coordinator who is a member of MPD to serve as the single point of contact with DOJ and the Independent Reviewer. The compliance coordinator will: coordinate compliance and implementation activities; facilitate access to MPD personnel and provide data, documents, and materials to DOJ as needed; ensure that all data, documents and records are maintained as provided in this Agreement; and assist in assigning implementation and compliance-related tasks to	Substantial Compliance	Major Roman Martinez from the Professional Compliance Section continues to be the single point of contact with the Independent Reviewer. Major Martinez has been in contact via email with the Independent Reviewer and provided the Independent Reviewer with additional documents and information in order to comply with the requirements of this section.

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	MPD personnel, as directed by the Chief of Police or his designee.		
#67	Within four months from the effective date, and every six months thereafter until this Agreement is terminated, the City will provide to DOJ and the monitor a self-assessment Compliance Report indicating whether the City has reached one of three levels of compliance with this Agreement: Substantial Compliance, Partial Compliance, or Non-Compliance.	Substantial Compliance	By July 10, 2016, and every six months thereafter until the termination of the DOJ Agreement, MPD will conduct a self-assessment compliance report. By July 10, 2016, MPD will submit its first self-assessment report to the Independent Reviewer.
#68	The self-assessment compliance report will include sections: A. The steps MPD and the City have taken during the reporting period to implement this Agreement ; B. Plans to correct any problems or lack of compliance; C. A response to any concerns raised by the United States regarding the City's previous Compliance Report; D. A projection of the work to be completed during the upcoming reporting period; E. Any anticipated challenges or concerns related to implementation of the Agreement; and F. A summary of documents relied on for statistical purposes or general data as the basis for self-assessment, if applicable.	Substantial Compliance	MPD's self-assessment compliance report will include steps the City and MPD have taken during the reporting period, plans to correct any problems or lack of compliance, a response to any concerns raised by the United States regarding the City's previous compliance report, projection of work to be completed during the reporting period, any anticipated challenges or concerns and a summary for statistical purposes or general data for self-assessment. As of this writing, MPD has not received any information from the Independent Reviewer regarding addressing or correcting any problems from any previous compliance report.

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#69	The Compliance Report shall exclude assessments of the sections of the Agreement for which the Independent Reviewer has already determined MPD and the City to be in Substantial Compliance.	N/A	MPD Compliance Report shall exclude assessments of the sections of the Agreement for which the Independent Reviewer has already determined MPD and the City to be in Substantial Compliance.
#70	The DOJ will collaborate with MPD in revising any policies, procedures, or practices relating to the use of force that DOJ deems to be deficient.	Substantial Compliance	MPD will collaborate with the DOJ in revising any policies, procedures or practices relating to the use of force that DOJ deems to be deficient.