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Issues and Findings

Discussed in this Brief: A systematic study of early warning systems designed to identify officers who may be having problems on the job and to provide those officers with the appropriate counseling or training. The findings are based on a survey of 832 local law enforcement agencies and site visits to three departments with established early warning systems.

Key issues: A growing body of evidence indicates that in any police department a small percentage of officers are responsible for a disproportionate share of citizen complaints. Early warning systems help supervisors identify these officers, intervene with them, and monitor their subsequent performance.

Even though early warning systems are becoming more popular among law enforcement agencies, little research has addressed the effectiveness of such programs. This Brief reports on a study that establishes a baseline description of early warning system programs and asks some fundamental questions:

● Are early warning systems effective in reducing police officer misconduct?

● Are some types of early warning systems more effective than others?

● What impact do early warning systems have on the departments in which they operate?

● Do early warning systems have unintended and undesirable effects?

Key findings: Twenty-seven percent of local law enforcement agencies serving populations of at least 50,000 had an early warning

Early Warning Systems: Responding to the Problem Police Officer

by Samuel Walker, Geoffrey P. Alpert, and Dennis J. Kenney

It has become a truism among police chiefs that 10 percent of their officers cause 90 percent of the problems. Investigative journalists have documented departments in which as few as 2 percent of all officers are responsible for 50 percent of all citizen complaints.[1] The phenomenon of the "problem officer" was identified in the 1970s: Herman Goldstein noted that problem officers "are well known to their supervisors, to the top administrators, to their peers, and to the residents of the areas in which they work," but that "little is done to alter their conduct."[2] In 1981, the U.S. Commission on Civil Rights recommended that all police departments create an early warning system to identify problem officers, those "who are frequently the subject of complaints or who demonstrate identifiable patterns of inappropriate behavior."[3]

An early warning system is a data-based police management tool designed to identify officers whose behavior is problematic and provide a form of intervention to correct that performance. As an early response, a department intervenes before such an officer is in a situation that warrants formal disciplinary action. The system alerts the department to these individuals and warns the officers while providing counseling or training to help them change their problematic behavior.

By 1999, 39 percent of all municipal and county law enforcement agencies that serve populations greater than 50,000 people either had an early warning system in place or were planning to implement one. The growing popularity of these systems as a remedy for police misconduct raises questions about their effectiveness and about the various program elements that are associated with effectiveness. To date, however, little has been written on the subject.[4] This Brief reports on the first indepth investigation of early warning systems. The investigation combined the results of a national survey of law enforcement agencies with the findings of case studies of three agencies with established systems.

How prevalent are early warning systems?

As part of the national evaluation of early warning systems, the Police Executive Research Forum—funded by the National Institute of Justice and the Office of Community Oriented Policing Services—surveyed 832 sheriffs' offices and municipal and county police departments serving populations of 50,000 or

Issues and Findings

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system in 1999; another 12 percent were planning to establish such a program.

Larger agencies were more likely than smaller agencies to use an early warning system. Among agencies with 1,000 or more sworn officers, 79 percent had or planned to have an early warning system; only 56 percent of agencies with between 500 and 999 sworn officers had or planned to have such a program.

No standards have been established for identifying which officers should participate in early warning programs, but there is general agreement that a number of factors can help identify problem officers: citizen complaints, firearm-discharge reports, use-of-force reports, civil litigation, resisting-arrest incidents, and pursuits and vehicular accidents.

Data from the three case-study agencies (in Miami, Minneapolis, and New Orleans) indicate the following:

● In spite of considerable differences among the programs, each program appeared to reduce problem behaviors significantly.

● Early warning systems encourage changes in the behavior of supervisors, as well as of the identified officers.

● Early warning systems are high-maintenance programs that require ongoing administrative attention.

A caveat is in order about the findings reported here. The research design was limited in a number of ways, and each of the early warning systems studied operates in the context of a department's larger commitment to increased accountability. It is impossible to disentangle the effect of the department's culture of accountability from that of the early warning program.

Target audience: State and local law enforcement administrators, planners, and policymakers; researchers; and educators.

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more.[5] Usable responses were received from 571 agencies, a response rate of 69 percent. The response rate was significantly higher for municipal agencies than for sheriff's departments.

Approximately one-fourth (27 percent) of the surveyed agencies had an early warning system in 1999. One-half of these systems had been created since 1994, and slightly more than one-third had been created since 1996. These data, combined with the number of agencies indicating that a system was being planned (another 12 percent), suggest that such systems will spread rapidly in the next few years.

Early warning systems are more prevalent among municipal law enforcement agencies than among county sheriffs' departments.

How does an early warning system work?

Early warning systems have three basic phases: selection, intervention, and postintervention monitoring.

Selecting officers for the program. No standards have been established for identifying officers for early warning programs, but there is general agreement about the criteria that should influence their selection. Performance indicators that can help identify officers with problematic behavior include citizen complaints, firearm-discharge and use-of-force reports, civil litigation, resisting-arrest incidents, and high-speed pursuits and vehicular damage.[6]

Although a few departments rely only on citizen complaints to select officers for intervention, most use a combination of performance indicators. Among systems that factor in citizen complaints, most (67 percent) require three complaints in a given timeframe (76 percent specify a 12-month period) to identify an officer.

Intervening with the officer. The primary goal of early warning systems is to change the behavior of individual officers who have been identified as having problematic performance records. The basic intervention strategy involves a combination of deterrence and education. The theory of simple deterrence assumes that officers who are subject to intervention will change their behavior in response to a perceived threat of punishment.[7] General deterrence assumes that officers not subject to the system will also change their behavior to avoid potential punishment. Early warning systems also operate on the assumption that training, as part of the intervention, can help officers improve their performance.

In most systems (62 percent), the initial intervention generally consists of a review by the officer's immediate supervisor. Almost half of the responding agencies (45 percent) involve other command officers in counseling the officer. Also, these systems frequently include a training class for groups of officers identified by the system (45 percent of survey respondents).

Monitoring the officer's subsequent performance. Nearly all (90 percent) the agencies that have an early warning system in place report that they monitor an officer's performance after the initial intervention. Such monitoring is generally informal and conducted by the officer's immediate supervisor, but some departments have developed a formal process of observation, evaluation, and reporting. Almost half of the agencies (47 percent) monitor the officer's performance for 36 months after the initial intervention. Half of the agencies indicate that the followup period is not specified and that officers are monitored either continuously or on a case-by-case basis.

Limitations of the survey findings

The responses from the national survey should be viewed with some caution. Some law enforcement agencies may have claimed to have an early warning system when such a system is not actually functioning. Several police departments created systems in the 1970s, but none of those appears to have survived as a permanent program.[8]

Findings from three case studies

The research strategy for the case studies was modeled after the birth cohort study of juvenile delinquency conducted by Wolfgang and colleagues.[9] They found that a small group within the entire cohort (6.3 percent of the total) were "chronic delinquents" and were responsible for half of all the serious crime committed by the entire cohort. The early warning concept rests on the assumption that within any cohort of police officers, a small percentage will have substantially worse performance records than their peers and, consequently, will merit departmental intervention. The research was designed to confirm or refute the assumption.

Three police departments were chosen for the case study investigation: Miami–Dade County, Minneapolis, and New Orleans. The three sites represent large urban areas, but the size of each police force varies considerably: At the time of the study, Miami–Dade had 2,920 sworn officers, New Orleans had 1,576 sworn officers, and Minneapolis had 890 sworn officers.

The three sites were chosen for several reasons. Each has an early warning system that had been operating for at least 4 years at the time of the study.

Also, the three systems differ from one another in terms of structure and administrative history, and the three departments differ in their history of police officer use of force and accountability (see "Three cities, three stories").

One goal of the case studies was to evaluate the impact of early warning systems on the officers involved. In New Orleans, citizen complaints about officers in the early warning program were analyzed for 2-year periods before and after the initial intervention. Officers subject to early warning intervention participate in a Professional Performance Enhancement Program (PPEP) class; their critiques of the class were analyzed and a 2-day class was observed to determine both the content of the intervention and officer responses to various components.

Demographic and performance data were collected in Miami–Dade and Minneapolis on a cohort of all officers hired in certain years—whether or not they were identified by the early warning systems. The performance data included citizen complaints, use-of-force reports, reprimands, suspensions, terminations, commendations, and promotions. Other data were collected as available in each site.

These records were sorted into two groups: officers identified by the early warning system and officers not identified, with the latter serving as a control group. The performance records of the early warning group were analyzed for the 2-year periods before and after the intervention to determine the impact of the intervention on the officers' behavior. The analysis controlled for assignment to patrol duty on the assumption that citizen complaints and use-of-force incidents are infrequently generated in other assignments.

Characteristics of officers identified by early warning systems. Demographically, officers identified by the systems do not differ significantly from the control group in terms of race or ethnicity. Males, are somewhat overrepresented and females are underrepresented. One disturbing finding was a slight tendency of early warning officers to be promoted at higher rates than control officers. This issue should be the subject of future research, which should attempt to identify more precisely whether some departments tend to reward through promotion the kind of active (and possibly aggressive) behavior that is likely to cause officers to be identified by an early warning system.

The impact of early warning systems on officers' performance. Early warning systems appear to have a dramatic effect on reducing citizen complaints and other indicators of problematic police performance among those officers subject to intervention. In Minneapolis, the average number of citizen complaints received by officers subject to early intervention dropped by 67 percent 1 year after the intervention. In New Orleans, that number dropped by 62 percent 1 year after intervention (exhibit 1). In Miami–Dade, only 4 percent of the early warning cohort had zero use-of-force reports prior to intervention; following intervention, 50 percent had zero use-of-force reports.

Data from New Orleans indicate that officers respond positively to early warning intervention. In anonymous evaluations of the PPEP classes, officers gave it an average rating of 7 on a scale of 1 to 10. All of the officers made at least one positive comment about the class, and some made specific comments about how it had helped them. Officers in the PPEP class that was directly observed were actively

engaged in those components they perceived to be related to the practical problems of police work, particularly incidents that often generate complaints or other problems. Officers were disengaged, however, in components that they perceived to be abstract, moralistic, or otherwise unrelated to practical aspects of police work.

This study could not determine the most effective aspects of intervention (e.g., counseling regarding personal issues, training in specific law enforcement techniques, stern warning about possible discipline in the future) or whether certain aspects are more effective for certain types of officers.

The impact of early warning systems on supervisors. The original design of this study did not include evaluating the impact of these systems on supervisors. Nonetheless, the qualitative component of the research found that these systems have potentially significant effects on supervisors. The existence of an intervention system communicates to supervisors their responsibility to monitor officers who have been identified by the program. The New Orleans program requires supervisors to monitor identified officers under their command for 6 months and to complete signed evaluations of the officers' performance every 2 weeks. Officials in Miami–Dade think that their system helps ensure

T Three cities, three stories

The three early warning systems in the sites selected for the case studies have different administrative histories and program structures, and the three police departments have different histories with regard to police officer use of force and accountability.

Miami–Dade County. The Miami–Dade Police Department (MDPD) currently enjoys a reputation for high standards of professionalism and accountability to reforms instituted following controversial racial incidents in the late 1970s and early 1980s.

As a result of the real and perceived problems between police and citizens, the Dade County Commission enacted legislation that opened to the public the internal investigations conducted by MDPD. In addition, an employee profile system (EPS) was created to track all complaints, use-of-force incidents, commendations, disciplinary actions, and dispositions of all internal investigations. As an offshoot of the EPS, MDPD created the Early Identification System (EIS) under the supervision of the Internal Review Bureau.

MDPD's EIS began operating in 1981. Quarterly reports list all officers who receive two or more citizen complaints that were investigated and closed or who were involved in three or more use-of-force incidents during the previous 3 months. Annual reports list officers who were identified in two or more quarterly reports. Monthly reports list employees who received two or more complaints during the previous 60 days, regardless of disposition.

The reports are disseminated through the chain of command to the supervisors of each officer identified. As one official described the system, supervisors use the reports "as a resource to determine if job stress or performance problems exist."[a] The information is intended to help supervisors evaluate and guide an employee's job performance and conduct in conjunction with other information.

The intervention phase of EIS consists primarily of an informal counseling session between the supervisor and the officer. The supervisor is expected to discuss the report with the officer and determine whether further action is needed. Such actions may include making referrals to employee assistance programs inside or outside the department, such as psychological services, stress abatement programs, or specialized training programs.

Postintervention monitoring of officers in the early warning system is informal and conducted by supervisors. Review of officers' performance records is designed to identify officers who continue to exhibit patterns of misconduct and to make the officers aware that their performance is being closely scrutinized. Additionally, the program puts supervisors on notice that their responsibilities include the close monitoring of those whose performance is problematic.

Minneapolis. When the study began, the Minneapolis Police Department (MPD) had a mixed reputation and was in transition under the leadership of a relatively new chief. MPD has long had a national reputation as a police department receptive to research. At the same time, however, MPD had a troubled local reputation with respect to the use of force by its officers. This reputation eventually brought a number of important political and administrative changes in the 1990s. The mayor declined to reappoint the incumbent police chief, who had failed to discipline the police officers. The new police chief began raising standards of accountability; among other reforms, he instituted a version of the COMPSTAT process. These changes have had direct implications for the system of accountability within the MPD and complicate any attempt to evaluate the impact of MPD's early warning system.

The program was established in the early 1990s and has undergone a number of significant administrative changes, including a period of slightly more than 1 year in the mid-1990s when the system ceased functioning altogether. After the data collection period for this study, a new procedure was instituted that calls for reviewing all reports of potentially problematic officer performance every

that supervisors will attend to potential problem officers under their command. In this respect, the systems mandate or encourage changes in supervisor behavior that could potentially affect the standards of supervision of all officers, not just those subject to early intervention. Furthermore, the system's database can give supervisors relevant information about officers newly assigned to them and about whom they know very little.

The impact of early warning systems on the rest of the department. The original design of this study did not include evaluating the impact of these systems on the departments in which they operate. Nonetheless, the qualitative component identified a number of important issues for future research. The extent to which a system changes the climate of accountability within a law enforcement agency is not known, and identifying it would require

a sophisticated research design. The qualitative findings suggest that an effective early intervention program depends on a general commitment to accountability within an organization. Such a program is unlikely to create or foster a climate of accountability where that commitment does not already exist.

The data developed as a part of an early warning system can be used to effect changes in policies, procedures, or training. Presumably, such changes

Three cities, three stories (continued)

2 weeks. This procedure substantially heightens the intensity of the level of supervision. Thus, the findings reported here do not reflect current practices in the department.

The only selection criterion for the system is citizen complaints. The formal selection criteria have changed over the years, however. Currently, a quarterly report lists all officers with two or more citizen complaints, whether sustained or unsustained.

The intervention phase in Minneapolis consists of only an informal counseling session between the officer and his or her immediate supervisor. In the early years, supervisors were required to document their counseling session in the form of a memorandum to the commander. There is currently no documentation requirement, and MPD's program does not include any formal postintervention monitoring. Apart from the routine supervision applied to all officers, officers who are subject to intervention are not subject to formal monitoring and no special data are collected on their performance.

New Orleans. In the mid-1990s, the New Orleans Police Department (NOPD) had a national reputation for both corruption and use of force by its officers. Between 1995 and 1998, NOPD terminated an average of slightly more than 18 officers per year and imposed an average of more than 100 suspensions per year. At the same time, 97 officers resigned or retired

while under investigation by the department and 105 officers were either arrested or issued a citation for a criminal law violation. These are extremely high figures compared with police departments of similar size.[b]

The officials associated with NOPD's Professional Performance Enhancement Program (PPEP) have a strong sense of identification with the program and are committed to maintaining and improving it. The department also conducts random integrity "stings" to identify possible corrupt activities by officers. Furthermore, PPEP does not limit its focus to individual officers, but also examines training, procedures, and supervision."[c]

As in Minneapolis, changes in the program occurred after the data collection period. It is likely that the administration of the program has weakened somewhat, due largely to the retirement or departure of key individuals. Thus, the findings reported here do not reflect current practices in the department.

Officers are selected for the program on the basis of three categories of performance indicators: incidents involving conflict in arrest and nonarrest situations and referrals from supervisors. However, intervention is not automatic; commanders review performance records and exercise discretion in selecting officers.

The PPEP class consists of an overview and explanation of the program and units on human behavior, stress management, conflict management, complaint avoidance, sensitivity training, "extraneous contributors to conflict" (such as substance abuse), and techniques and assessment (which includes training related to such police activities as tactical stops, situation assessment, handcuffing, and custodial security). Each class includes a private counseling session with the instructor, during which the officer's record is reviewed and the reasons for being selected for the program are explained.

Immediate supervisors are required to monitor each officer for a period of 6 months after the intervention. During that period, the supervisor is required to observe the officer interacting with citizens while on duty and to complete a bi-weekly evaluation of the officer's performance.

a. Charette, Bernard, "Early Identification of Police Brutality and Misconduct," Miami: Metro-Dade Police Department, n.d., p. 5.

b. "Disciplinary Action Breakdown," New Orleans Police Department, February 9, 1999.

c. New Orleans Police Department, Public Integrity Division, "To Whom It May Concern," May 5, 1998.

help reduce existing problems and help the department maintain and raise its standards of accountability. Thus, these systems can be an important tool for organizational development and human resource management.[10]

The nature of early warning systems. A second goal of the case studies was to describe the systems themselves. In all three sites, qualitative data gathered from official documents and interviews with key stakeholders yielded a description and assessment of the formal structure and administrative history of each program, along with an assessment of its place in the larger processes of accountability in the department.

In addition to finding that the early warning systems in the three sites vary considerably in terms of their formal program elements, the study documented that an effective system requires considerable investment of resources and administrative attention. Miami–Dade's program, for example, is part of a sophisticated data system on officers and their performance. The New Orleans program involves several staff members, including one full-time data analyst and two other full-time employees who spend part of their time entering data.

Early warning systems should not be considered alarm clocks—they are not mechanical devices that can be programmed to automatically sound an alarm. Rather, they are extremely complex, high-maintenance administrative operations that require close and ongoing human attention. Without this attention, the systems are likely to falter or fail.

Limitations of the case study findings. The findings regarding the impact of early warning intervention

Exhibit 1. **Annual average number of complaints against officers, before and after intervention**
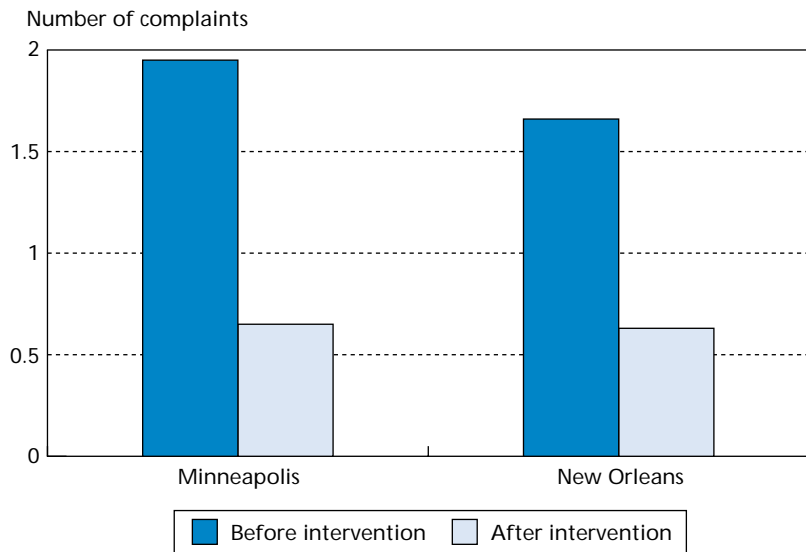
should be viewed with caution. As the first-ever study of such systems, this project encountered a number of unanticipated problems with the data. First, it was not possible to collect retrospectively systematic data on positive police officer performance (e.g., incidents when an officer avoided using force or citizens felt they had been treated fairly and respectfully). Thus, it is not known whether early intervention had a deterrent effect on desirable officer behavior.

Second, the early warning systems in each site studied operate in the context of a larger commitment to increased accountability on the part of the police department. Given the original research design, it is impossible to disentangle the effect of this general climate of rising standards of accountability on officer performance from the effect of the intervention program itself.

Finally, the early warning systems in two of the three sites experienced significant changes during the years for which data were collected. Thus,

the intervention delivered was not consistent for the period studied. Significant changes also occurred in two sites immediately following the data collection period. In one instance, the system was substantially strengthened. In the other, it is likely that the administration of the system has deteriorated significantly; this deterioration may have begun during the study, affecting the data that were collected.

Policing strategies and legal considerations

Early warning systems and policing strategies. These intervention strategies are compatible with both community-oriented and problem-oriented policing. Community-oriented policing seeks to establish closer relations between the police and the communities they serve. Insofar as the systems seek to reduce citizen complaints and other forms of problematic behavior, they are fully consistent with these goals.[11]

Problem-oriented policing focuses on identifying specific police problems

and developing carefully tailored responses.[12] Early warning systems approach the problem officer as the concern to be addressed, and the intervention is the response tailored to change the behavior that leads to indicators of unsatisfactory performance.

Early warning systems and traffic-stop data. The issue of racial profiling by police has recently emerged as a national controversy. In response to this controversy, a number of law enforcement agencies have begun to collect data on the race and ethnicity of drivers stopped by their officers.

An officer who makes a disproportionate number of traffic stops of racial or ethnic minorities (relative to other officers with the same assignment) may be a problem officer who warrants the attention of the department. Traffic-stop information can be readily incorporated into the database and used to identify possible racial disparities (as well as other potential problems, such as disproportionate stops of female drivers or unacceptably low levels of activity).

Legal considerations of these systems. Some law enforcement agencies may resist creating an early warning system for fear that a plaintiff's attorney may subpoena the database's information on officer misconduct and use that information against the agency in lawsuits alleging excessive use of force.[13] Several experts argue, however, that in the current legal environment, an early warning system is more likely to shield an agency against liability for deliberate indifference regarding police use of force. Such a system demonstrates that the agency has a clear policy regarding misconduct, has made a good faith effort to identify employees whose performance is unsatisfactory, and has a program in place to correct that behavior.[14]

Policy concerns and areas for further research

Each of an early warning system's three phases involves a number of complex policy issues.

Selection. Although the selection criteria for most early warning systems consider a range of performance indicators, some rely solely on citizen complaints. A number of problems related to official data on citizen complaints, including underreporting, have been documented.[15] Using a broader range of indicators is more likely to identify officers whose behavior requires departmental intervention.

Intervention. In most early warning systems, intervention consists of an informal counseling session between the officer and his or her immediate supervisor. Some systems require no documentation of the content of that session, which raises concerns about whether supervisors deliver the intended content of the intervention. It is possible that a supervisor may minimize the importance of the intervention by telling an officer "not to worry about it," thus reinforcing the officer's behavior. Involving higher ranking command officers is likely to ensure that the intervention serves the intended goals. Further research is needed on the most effective forms of intervention and whether it is possible to tailor certain forms of intervention to particular categories of officers.

Postintervention monitoring. The nature of postintervention monitoring varies among systems. Some systems rely on informal monitoring of the subject officers; others employ a formal mechanism of observation and documentation by supervisors. The relative impact of different postintervention monitoring systems on individual officers, supervisors, and departments requires further research.

One tool among many

Early warning systems have emerged as a popular remedy for police misconduct. This study suggests that these systems can reduce citizen complaints and other problematic police behavior. Officers in the three departments investigated as case studies were involved in substantially fewer citizen complaints and use-of-force incidents after the intervention than before. In these three departments, however, the systems were part of larger efforts to raise standards of accountability. The effectiveness of such a system is reinforced by (and probably dependent on) other policies and procedures that enforce standards of discipline and create a climate of accountability.

An effective early warning system is a complex, high-maintenance operation that requires a significant investment of administrative resources. Some systems appear to be essentially symbolic gestures with little substantive content, and it is unlikely that an intervention program can be effective in a law enforcement agency that has no serious commitment to accountability. It can be an effective management tool, but it should be seen as only one of many tools needed to raise standards of performance and improve the quality of police services.

Notes

1. "Kansas City Police Go After Their 'Bad Boys,'" *New York Time,* September 10, 1991; and "Waves of Abuse Laid to a Few Officers," *Boston Globe,* October 4, 1992.

2. Herman Goldstein, *Policing a Free Society,* Cambridge, MA: Ballinger, 1977: 171.

3. *Who is Guarding the Guardians?* Washington, DC: U.S. Commission on Civil Rights, 1981: 81.

4. Kappeler, Victor, Richard Sluder, and Geoffrey Alpert, *Forces of Deviance: Understanding the Dark Side of Policing,* Prospect Heights, IL: Waveland Press, 1998.

5. The first wave of the survey occurred in August 1998, with a second wave in October 1998 and followup in February 1999.

6. For discussions of recommended perform-ance categories, see International Association of Chiefs of Police, *Building Integrity and Reducing Drug Corruption in Police Departments,* Washington, DC: U.S. Department of Justice, Bureau of Justice Assistance, 1989: 80; and Reiter, Lou, *Law Enforcement Administrative Investigations: A Manual Guide,* 2nd ed., Tallahassee, FL: Lou Reiter and Associates, 1998: 18.2.

7. Zimring, Franklin, and Gordon Hawkins, *Deterrence,* Chicago: University of Chicago Press, 1973.

8. Milton, Catherine H., Jeanne Wahl Halleck, James Lardner, and Gary L. Albrecht, *Police Use of Deadly Force,* Washington: The Police Foundation, 1977: 94–110.

9. Wolfgang, Marvin E., Robert M. Figlio, and Thorsten Sellin, *Delinquency in a Birth Cohort*, Chicago: University of Chicago Press, 1972.

10. Mathis, Robert L., and John H. Jackson, eds., *Human Resource Management: Essential Perspectives,* Cincinnati: Southwestern College Publishing, 1999: 98–102; and Poole, Michael, and Malcolm Warner, *The IEBM Handbook of Human Resource Management,* London: Inter-national Thomson Business Press, 1998: 93.

11. Alpert, Geoffrey, and Mark H. Moore, "Measuring Performance in the New Paradigm of Policing," in *Performance Measures for the Criminal Justice System,* Washington, DC: U.S. Department of Justice, Bureau of Justice Statistics, 1993: 109–142.

12. Eck, John E., and William Spelman, Problem-Solving: *Problem-Oriented Policing in Newport News,* Washington, DC: U.S. Department of Justice, National Institute of Justice, 1987.

13. Reiter, Lou, *Law Enforcement Administrative Investigations,* chapter 18.

14. Gallagher, G. Patrick, "The Liability Shield: From Policy to Internal Affairs," in Reiter, Lou, *Law Enforcement Administrative Investigations,* chapter 20; and Beh, Hazel Glenn, "Municipal Liability for Failure To Investigate Citizen Complaints Against Police," *Fordham Urban Law Journal* XXV (2) 1998: 209–254.

15. Walker, Samuel, *Police Accountability: The Role of Citizen Oversight,* Belmont, CA: Wadsworth Thompson, 2001.

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