

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:15-CV-01046
)	
Plaintiff,)	
)	JUDGE SOLOMON OLIVER, JR.
vs.)	
)	<u>MOTION TO APPROVE SPECIALIZED</u>
CITY OF CLEVELAND)	<u>CRISIS INTERVENTION TEAM</u>
)	<u>OFFICER TRAINING CURRICULUM</u>
Defendant.)	
)	
)	

Pursuant to Paragraphs 145 and 146 of the Consent Decree and the Fourth Year Monitoring Plan in the above-captioned matter, the City of Cleveland (the “City”), on behalf of the Cleveland Division of Police (“CDP” or “Division”), submitted proposed curriculum for its enhanced specialized training in responding to individuals in crisis (“Specialized CIT Training Curriculum” or “Proposed Training Curriculum”) to the Monitoring Team, attached hereto as Exhibits A through Z. Exhibit A contains the overall schedule of the Proposed Specialized Crisis Intervention Training Curriculum as well as the daily list of courses throughout the week. Exhibits B through X contain information on the individual courses organized alphabetically by title. Exhibit Y contains descriptions of applied scenarios which follow course lecture material. Exhibit Z contains descriptions of CDP event-based scenarios that will be simulated on the final day of the training.

The Monitoring Team has carefully reviewed the Proposed Training Curriculum. The Team has determined that it provides instruction on a wide range of knowledge and skills needed by Specialized Crisis Intervention Team Officers to perform their duties under the Consent Decree. The Monitoring Team therefore recommends that the Court approve CDP's Proposed Training Curriculum.

I. SUMMARY OF CONSENT DECREE REQUIREMENTS REGARDING SPECIALIZED CRISIS INTERVENTION TEAM OFFICER TRAINING

Under Paragraph 145 of the Consent Decree, the Division must provide “enhanced specialized training in responding to individuals in crisis to certain officers (‘specialized CIT officers’).” Specialized CIT Officers maintain standard patrol duties, except when called upon to respond to incidents or calls involving individuals in crisis.

Paragraph 146 states that “the enhanced training for specialized CIT officers will be at least 40 hours” and that the training will be “adequate in quality, scope and type[.]” Further, the training must cover a range of topics including “field evaluation, suicide intervention, community mental health resources, common mental health diagnoses, the effects of drug and alcohol abuse, perspectives of individuals with mental health issues, family members, the rights of individuals with mental health issues, civil commitment criteria, crisis de-escalation, and scenario-based exercises.” Dkt. 7-1 at ¶ 146. The training must include “on-site visitation to mental health and substance abuse facilities and interaction with individuals with mental illness and substance abuse disorders.” *Id.*

II. PROCEDURAL HISTORY

The Proposed Training Curriculum was developed by the Mental Health Response Advisory Committee’s (“MHRAC” or “the Committee”) Training Subcommittee

(“Subcommittee”). The Subcommittee includes members of the Division, community advocates, mental health and developmental service providers, as well as ad hoc representation from the Department of Justice, City of Cleveland, and the Monitoring Team. Under the leadership of Shannon Jerse of St. Vincent Hospital, Dr. Richard Cirillo of the Cuyahoga County Board of Developmental Disabilities, and Kyle Miller of the Sisters of Charity Health System, the Subcommittee made use of a number of resources in developing the 40-hour Proposed Training Curriculum. The Alcohol, Drug and Mental Health Services Board of Cuyahoga County (“ADAMHS Board”), which has conducted training for CDP for over ten years, provided an initial curriculum.

As indicated in Paragraph 153 of the Consent Decree, the Subcommittee reviewed feedback provided by the Ohio Criminal Justice Coordinating Center of Excellence (“CJCCOE”) on the ADAMHS Board/CDP curriculum and made modifications based on the recommendations from the CJCCOE study. Two founding members of the CJCCOE, Dr. Mark Munetz and Lt. Michael Woody (ret.), advised the committee in this work. Next, the Subcommittee reviewed a study of over 1,000 CIT sites and over 250 CIT curricula to gain a perspective on national best practices. Finally, a number of Cleveland-area subject matter experts provided technical assistance on specific topics in the final curriculum. This intensive effort was overseen by MHRAC which includes CDP, the City and ADAMHS Board leadership, community members, advocacy groups such as the National Alliance on Mental Illness (“NAMI”), individuals with lived experience, treatment agencies, and mental health and substance abuse professionals. The Department of Justice and the Monitoring Team have been active participants in both MHRAC and the Subcommittee throughout the Proposed Training Curriculum process.

The Subcommittee's initial work was to develop an outline and schedule of courses. This schedule was reviewed and approved by MHRAC. After completing work on the Division's Crisis Intervention Curriculum for in-service training for all officers, the Subcommittee returned to the Specialized CIT Officer curriculum and presented a final draft of completed courses to MHRAC.

MHRAC approved the Proposed Specialized CIT Training Curriculum on February 8, 2019. After some requested edits and corrections, the Curriculum was submitted to the Parties and the Monitoring Team.

III. STANDARD OF REVIEW

The Monitoring Team's role is to "assess and report whether the requirements" of the Consent Decree "have been implemented." Dkt. 7-1 at ¶ 351; *accord id.* ¶ at 352 (requiring the Monitor to "review . . . policies, procedures, practices, training curricula, and programs developed and implemented under" the Decree). The task of the Monitoring Team here is to determine whether the Proposed Training Curriculum complies with the Consent Decree's requirements.

IV. ANALYSIS OF THE PROPOSED TRAINING CURRICULUM

A substantial training block of 40 hours, the Proposed Training Curriculum consists of 16 in-depth lecture and panel presentations, three de-escalation lectures with a review of models of crisis intervention, 16 half-hour realistic scenarios developed from CDP crisis-related events, six officer evaluation and feedback sessions, a review of the role of the Specialized CIT Officer and the Division's Crisis Policy, and site visits at 12 agencies where officers will interact with individuals with lived experience and learn about resources for citizens seeking assistance in the Cleveland area. Each topic is accompanied by real-world examples of crisis events in Cleveland that are directly connected to issues described in the preceding clinical lecture.

The lectures themselves provide a strong foundation for understanding issues related to severe and persistent mental illness, suicide behavior, substance abuse, and developmental disabilities. Through the Proposed Training Curriculum, Specialized CIT Officers will be expected to develop a strong understanding of special populations including veterans at risk for PTSD, adolescents and families experiencing mental health issues, individuals struggling with homelessness, and elderly adults. The Proposed Training Curriculum also contains lectures on mental health law so that officers will understand the appropriate use of civil commitment and emergency services as well as the rights of those in a behavioral crisis. The Proposed Training Curriculum also includes lectures on strategic models of crisis intervention and trauma-informed care. Perhaps most importantly, officers will visit a wide range of agencies and drop-in centers to meet with individuals with lived experience where informal discussions can lead to better understanding and communication.

Overall, the Proposed Training Curriculum provides significant, in-depth guidance on crisis events for the Division's Specialized CIT Officers and provides instruction on a wide range of mental health, addiction, and social service issues. The curriculum includes a review of policy and procedures for Specialized CIT Officers encountering crisis events during patrol duties. The Proposed Training Curriculum also is designed to equip officers with practical de-escalation skills and improve communication and understanding with individuals experiencing behavioral crisis events.

V. CONCLUSION

The task of the Monitoring Team is to duly consider whether the City's submitted Proposed Training Curriculum satisfies the terms of the Consent Decree. The Monitoring Team concludes that the Proposed Training Curriculum meets the terms of the Consent Decree. Accordingly, the

Monitor approves the Specialized Crisis Intervention Team Officer Training Curriculum in its entirety and requests that this Court order it effective immediately.

Respectfully submitted,

/s/ Hassan Aden

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CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2019, I served the foregoing document entitled Motion to Approve Specialized Crisis Intervention Team Officer Training Curriculum via the court's ECF system to all counsel of record.

/s/ Ayesha Bell Hardaway
AYESHA BELL HARDAWAY