

**To: Commission for Florida Law Enforcement Accreditation, Inc.**  
**From: Gloria Sepanik, Team Leader**  
**Date: May 23, 2016**  
**Re: Full Compliance Onsite Assessment Report**  
**North Miami Police Department**  
**Standards Manual 4.0.33**

**A. Dates of On-site Assessment: April 19-21, 2016**

**Key Agency Personnel:**

Chief Executive Officer: Chief Leonard Burgess  
 Accreditation: Accreditation Manager Ms. Dale Briganti  
 Sergeant Diana Roman

**B. Assessment Team:**

Team Leader: Gloria Sepanik  
 Accreditation Manager  
 Punta Gorda Police Department  
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 Clermont Police Department  
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**C. Standards Summary Tally:**

**CFA Compliance Tally**

	Total Number of Standards	Number of Standards Applied (By Function)	Number of Standards Ignored	Number of Standards Met	Number of Standards Not Met	Percent of Standards Applied	Percent of Standards Met	Number of Standards Met	Percent of Standards Met
<b>M</b>	162	16	0	146	0	0.00%	100.00%	140	95.89%
<b>N</b>	98	12	0	86	12	13.95%	86.05%	74	100.00%

## **D. Agency Profile**

On July 11, 1926, the town of North Miami was initially formed with the approval of the majority of the city's 49 registered voters. Incorporated as the town of Miami Shores, it wasn't until 1932 that the community changed the name to "North Miami". The city has approximately 63,000 residents evenly divided between male and female. The majority of the residents are African American, Caucasian and Hispanic, in that order. The city covers approximately ten square miles which includes residential, commercial and industrial properties. A portion of the area is adjacent to canals and waterways.

Chief Leonard Burgess has dedicated 30 years of service in law enforcement, and was appointed Chief of Police on June 8, 2014. He joined the North Miami Police Department (NMPD) in September 1984 and left for the Miami-Dade Police Department in October 1988. He was rehired in October 2010 as a Police Major, and was subsequently appointed to Assistant Chief of the Field Operations Division in December 2011, and then appointed as the Interim Chief of Police in February 2014. On June 21, 2014, he was promoted to Chief of Police.

The North Miami Police Department has 125 sworn officers and 36 full-time civilian employees and is comprised of the following:

### Chief of Police

Chief of Police, to include Chief's Office, Office of Professional Compliance (Internal Affairs and Accreditation), Human Resources and Career Development Unit, Public Information, Budget and Grants, and Building Operations and Maintenance.

### Investigative/Administrative Division

Investigative Section to include: General Investigations Unit; Crime Suppression Unit, Crime Analysis, SWAT, City's Emergency Manager, Crime Scene Unit, and Crisis Intervention Services.

Administrative Section, to include Records/Lobby Receptionists, Communications, Quartermaster, Network Specialist, and Off-Duty Coordinator.

### Field Operations Division

Uniform Patrol Section, to include Uniform Patrol, Canine, Honor Guard, Reserve Officers Program, and FTO Program.

Uniform Support Section, to include Traffic Safety Unit, Marine Patrol, Public Service Aides, and School Crossing Guards Program.

Community Policing/Code Compliance

Community Services Section, to include Community Services Unit, School Resource Officers, Animal Control, Police Athletic League, Citizens Mobile Patrol, Police Cadets, Citizens Police Academy, and Chaplaincy Program. Code Compliance to include Code Compliance Unit, Minimum Housing, False Alarms, Abandoned Property and Sanitation.

## **E. Assessment Summary**

On April 18, 2016, the assessment team arrived at the hotel in Aventura, Florida. Team Leader Sepanik, and Team Members Sergeant Grassi and Lieutenant Kutner met to discuss chapter assignments which had been provided prior to their arrival.

The morning of April 19, 2016, the assessment team was picked up by Sergeant Diana Roman and driven to headquarters where they were escorted to the conference room to prepare for file review. The conference room was located for easy access to the Chief and the Command Staff. It was adequately set up to conduct the assessment and interviews.

The entrance interview began at 9:30 a.m. and was attended by Chief Burgess, Assistant Chief Juriga, Assistant Chief Eugene, Accreditation Manager Dale Briganti, Sergeant Diana Roman and many other members of the executive staff. The Chief welcomed the team and introduced his staff. The assessment team then introduced themselves. Team Leader Sepanik shared the philosophy of the Commission for Florida Law Enforcement Accreditation (CFA) during assessments and outlined the process. The Team Leader explained the intentions of the team were to conduct the assessment with as little disruption to the department's daily routine as possible.

The team worked diligently on the file review process. They found the files contained multiple file maintenance issues which slowed the team's progress throughout the assessment. The file maintenance issues required proofs to be uploaded, and reclassification of standards from not applicable, elected 20% or in compliance. The assessment team worked with the agency to bring as many of their files into compliance in order to meet accreditation requirements. However, due to the length of time this took, it inhibited the assessment team from spending adequate time with personnel and reviewing agency facilities.

On April 20, 2016, the assessment team met with members of the command staff in front of headquarters. The agency provided a static display where Team Members conducted many interviews and identified a variety of observable accreditation standards. The following members/components represented the organization and answered questions:

Motors	Officer Ramon DeJesus Unmarked vehicle Motorcycle
Patrol	Commander Tim Belcher Patrol Supervisor Commander vehicle

Investigations – Detective Rocio Torres  
Unmarked vehicle  
Crime Scene – Technician Ineirys Zapata  
Crime scene van  
Patrol Officer Emmanuel Ocean  
Sergeant Andrew Rossi – Patrol Supervisor  
K-9 Officer Yosbel Llerena  
K-9 Lex (Bomb dog)  
Officer Otoniel Fernandez  
K-9 (Drug dog)  
SWAT – Commander Angel Rivera – SWAT Commander  
Marine – Officer Dagoberto Andollo

Officer Ramon DeJesus – Motors: Team Member Grassi discussed DUI procedure with Officer DeJesus. The team also inspected the motorcycle and car displayed. Both vehicles had all required equipment, were clean, and appeared to be in good working order. Officer DeJesus was very professional and competent and his answers all showed a good working knowledge of department written directives.

Commander Tim Belcher – Patrol: Team Member Grassi discussed complaints against officers with Commander Belcher. He indicated a detailed knowledge of department directives, particularly the requirement to forward complaints to the IA function expeditiously. Commander Belcher's vehicle was also equipped with all of the necessary items.

Detective Rocio Torres – Investigations: The team discussed procedures for interrogation of juvenile suspects. Detective Torres was well-versed in department directives governing those functions.

Crime Scene Technician Ineirys Zapata: Team Member Grassi discussed exposure control procedures with CST Zapata. CST Zapata was familiar with proper procedures and had equipment onboard her agency vehicle for both PPE and disposal of contaminated items.

Officer Emmanuel Ocean – Patrol: Officer Ocean was competent and professional in answering all questions presented by team members.

Marine: Officer Andollo – Team Leader Sepanik asked questions regarding policy and officer safety as it pertained to boat handling, boating while intoxicated stops, and pursuits on the water. He demonstrated to the assessment team he is very competent and an experienced boatman.

Following the static display, the team was given a tour of the department. At the conclusion of the tour, the team was escorted back to the conference room to continue file review and agency interviews to verify compliance with accreditation standards.

Throughout the three day assessment, the team interviewed various agency members to include:

Officer Carter	Crime Scene Technician Santana
Field Training Officer Dolly	Communications Supervisor Johnson
Officer Marti	Detective Raines
Sergeant Rossi	Detective Blemur
Commander Fishel	Field Training Officer Dennis
Commander Croye	Assistant Director Paola Pierre
Records Supervisor Salaverria	Personnel Administrator Takisha Williams
Property/Evidence Manager Gomer	Public Information Officer Buissereth
Confidential Administrative Coordinator Brenda Lee	

#### **F. Standards Noncompliance Discussion:**

##### **4.07M (Assessor: BK)**

A directive addresses the use of agency approved less-lethal weapons, and must include:

- A. On-duty use;
- B. Off-duty use;
- C. Proven proficiency prior to carrying;
- D. A review process for selecting all types of less-lethal weapons authorized for use;
- E. Maintaining a current list of each type of approved less-lethal weapon; and
- F. A requirement for a documented annual inspection of less-lethal weapons to ensure expiration dates are not exceeded.

The agency directive addressing agency approved less-lethal weapons did not include a review process for selecting all types of less-lethal weapons authorized for use, either for initial selection or subsequent changes of equipment. The agency added language reading "Only firearms and less lethal weapons authorized by the Chief of Police will be carried or utilized by Department personnel."

There is no requirement in agency directive for a documented annual inspection of less-lethal weapons to ensure expiration dates are not exceeded. Furthermore, the "inspection form" submitted to assessors is a checklist and only indicates if an officer possesses the equipment. It does not indicate any expiration dates on the form. Interviews with members of command staff, training personnel and line officers all substantiate it is the practice of the agency that individual officers are responsible for ensuring their less-lethal equipment is not expired, and there is not supervisory oversight of this requirement. During the static display Team Member Kutner inspected the Taser cartridge of a Field Training Officer and found that the cartridge had expired in November of 2014. This did not appear to be a systemic problem, and the member's cartridge was immediately replaced. The agency modified their City Issued Equipment Checklist/Inspection form to include expiration dates.

**14.11M** (Assessor: AG)

A directive requires that members authorized to carry weapons receive *in-service training* which includes:

- A. Annual demonstration of proficiency with firearms authorized to carry;
- B. Annual use of force training;
- C. Annual Dart-Firing Stun Gun training in accordance with Florida Statute;
- D. *Biennial* less-lethal weapon training (for weapons other than the Dart-Firing Stun Gun);
- E. Applicable legal updates.

The agency self-reported non-compliance issue in which Taser training was not conducted during year 2 of this reaccreditation cycle. As the Taser instructor's certificate had expired. Once he completed his training in May 2015, training resumed.

The agency was unable to provide documentation (3YD) documenting yearly Taser or OC Spray training.

**28.05M** (Assessor: BK)

A directive describes procedures for registering *sexual predators* and community notification in accordance with Florida statute.

The written directive did not address the requirement in the standard to refer sexual predators wishing to move into the municipality to the appropriate registering agency (in this case MDPD). The agency directive also referred to a procedure for secondary registration in accordance with a North Miami City Ordinance which no longer exists.

The directive was over 10 years old and, in speaking with the detective in charge of this area of investigations, it did not appear he was familiar with the directive. In addition, it did not appear there had been any review of this directive or submissions for changes in over a decade.

Community notification for sexual predators conducted were not in compliance with the statutory requirements of F.S. 775.21 as they did not include any demographic information, a description of the crime for which the individual was convicted and classified as a sexual predator, nor any indication if the victim of that crime was an adult or a minor.

**28.06M** (Assessor: BK)

A directive describes procedures for registering *sexual offenders* in accordance with Florida statute.

The written directive did not address the requirement in the standard to refer sexual offenders wishing to move into the municipality to the appropriate registering agency (in

this case MDPD). The agency directive also referred to a procedure for secondary registration in accordance with a North Miami City Ordinance which no longer exists.

The directive was over 10 years old and, in speaking with the detective in charge of this area of investigations, it did not appear he was familiar with the directive. In addition, it did not appear there had been any review of this directive or submissions for changes in over a decade.

**37.03M** (Assessor: BK)

The agency shall ensure that all members participate in an infectious disease training program prior to assignment where risk of occupational exposure may occur.

The agency self-reported that a Crime Scene Technician hired in June 2015 did not receive required blood borne pathogen training until January 2016.

**37.05M** (Assessor: BK)

The agency has a Hepatitis B vaccination program that is voluntary for all members who have *occupational exposure*. The program includes:

- A. Vaccinations made available after receipt of infectious diseases training within ten working days of initial assignment;
- B. A requirement that members who decline to participate sign an acknowledgement of declination;
- C. A provision that members who initially decline vaccinations are provided the vaccination if the decision is made to accept;
- D. Vaccinations must be provided at no cost to the member at a reasonable time and place; and
- E. Vaccinations are provided by, or under the supervision of, a licensed physician or a Licensed Healthcare Professional.

The Crime Scene Technician referenced above received vaccinations in August 2015. Due to the above circumstances, the Crime Scene Technician could not have received vaccinations after receiving training.

**G. Corrective Action Discussion:**

**3.01M** (Assessor: GS)

The agency has a written directive system which includes:

- A. A description of the format for each type of directive;
- B. Procedures for numbering and revising directives, as appropriate;
- C. A system for keeping the directives current;
- D. Procedures for staff review and/or approval of proposed policies, procedures, and rules and regulations prior to their promulgation;

- E. Identification of individuals or positions within the agency having authority to issue written directives;
- F. Procedures for dissemination and receipt of new or revised directives within a specified timeframe; and
- G. Procedures for storing and archiving agency directives.

During the review process it was noted the agency had a written directive (Directive 100.05) which stated:

“VII. A. In order to meet changing needs, it is essential to periodically review the Department’s written directives.”

Periodic as defined by CFA means once per cycle. The agency policy did not identify what periodic meant; therefore the word periodic was deleted from the written directive.

The accreditation manager conducts a perpetual review of policies in conjunction with subject matter experts and command staff on an as needed basis.

**4.05M** (Assessor: BK)

A directive addresses the use of agency approved firearms to include:

- A. On duty;
- B. Off duty use;
- C. Proven proficiency prior to carrying;
- D. A requirement for only agency approved ammunition to be used while on duty;
- E. Inspection, and approval of agency approved firearms by a qualified firearms instructor or armorer, prior to carrying;
- F. A process to remove unsafe firearms; and
- G. Maintaining a record on each firearm approved by the agency for official use.

The agency modified their policy to document the process for an officer to request and have approved, the ability to carry a personally owned firearm. The agency modified their Firearms Inspection Form for the request, approval, inspection of the firearm and demonstrated proficiency with the weapon following the mock assessors’ recommendation.

**18.15M** (Assessor: BK)

A written directive establishes procedures for conducting photographic identification arrays and live lineups presented to eyewitnesses to include the following:

- A. The creation, composition, and utilization of the photo array or lineup;
- B. Standard instructions to be used by the investigator conducting the photo array or lineup to instruct the witness prior to the photo array or lineup;
- C. A direction to the investigator conducting the array or lineup to avoid any conduct that might directly or indirectly influence the witness’ decision, and to avoid

comments or actions that suggest the witness did or did not identify the suspect when the array or lineup is completed;

- D. Method(s) of presenting the array or lineup;
- E. Discerning the level of confidence in an identification as expressed by the witness; and
- F. Documenting the procedure and outcome of the array or lineup, including noting the witness' response and exact words.
- G. Initial and periodic refresher training on the policy, of members involved in eyewitness identification efforts; and
- H. Filing of the agency's current eyewitness identification policy with the appropriate State Attorney's Office.

The written directive for conducting photographic identification arrays did not include any language addressing the officer's requirement to discern the level of confidence in an identification expressed by the witness. The agency did have this language in its directive for "show-ups," and mirrored that language in their photo line-up directive.

**25.02M** (Assessor: BK)

A directive requires that the towing of all vehicles be documented and includes the following information, at a minimum:

- A. Time;
- B. Date;
- C. Location;
- D. Requesting member;
- E. Reason for removal or tow;
- F. Towing service name;
- G. Location of the vehicle;
- H. Notification (or attempts) to the registered owner;
- I. Inventory of contents;
- J. Placing and removal of holds; and
- K. Procedures to initiate entry and removal of FCIC entries, when appropriate.

A directive regarding the towing of vehicles does not exist as a standalone directive. The towing of vehicles is covered in another directive addressing traffic related issues. That directive did not address nor require all towed vehicles be documented to include the specified elements required in the standard (i.e. time, date, location, requesting member, reason for tow, towing service name, location of the vehicle, notification to the registered owner, inventory of contents, placing of removal or holds, and procedures to initiate entry and removal of FCIC entries when appropriate). The policy was amended to include the compliant practices of the agency.

**36.01M** (Assessor: GS)

A directive outlines procedures for property held by the agency to include:

- A. Logging all property into agency records within a specified timeframe;
- B. Placing property under the property and evidence function before the officer ends his/her tour of duty or under exceptional circumstances, securing the property with documented supervisory approval;
- C. A description of each item of property and the circumstances by which the property came into the agency's possession;
- D. Guidelines for packaging and labeling property prior to submission;
- E. Extra security measures for handling exceptional, valuable, or sensitive items of property; i.e., money/negotiable instruments, precious metals, jewelry, weapons, and drugs;
- F. Efforts to identify and notify the owner or custodian of property in the agency's custody; and
- G. Procedures for the temporary and final release of property items from the property and evidence function.

Jewelry, money under \$1000.00 and drugs not of trafficking weight are comingled with other evidence associated with specific cases. The agency has a locked door in order to enter the property and evidence administrative area, and a second locked door prior to entering the area where property and evidence is actually stored. Although separation is not required by standard, the agency implemented an action plan to separate all items considered sensitive, regardless of value. All other sensitive items above the identified threshold are separated in a vault inside the property and evidence area.

**36.02M** (Assessor: GS)

A directive states property/evidence custodians are accountable for all property and evidence within their control, and addresses the following, at a minimum:

- A. An annual audit, which consists of an examination of conformance with agency controls, policies and procedures, of the property and evidence function is conducted by a member not routinely or directly connected with control of property;
- B. An unannounced annual inspection, which consists of a review of property and evidence storage areas for organization and orderliness, is conducted as directed by the agency's CEO;
- C. An annual inventory, which consists of a full or partial accounting, as defined by the agency, of property is conducted by the property/evidence custodian or designee and a designee of the CEO; and
- D. Follow-up investigative procedures for lost, missing, or stolen property or evidence.

The annual report shows four items pulled for the inventory, meeting the minimum requirements of the standard as they have in excess of 70,000 pieces of evidence. The policy does not specify the amount of items reviewed. For year one, 46 items in four case files were audited, for year two, 32 items in four sealed case files were audited, and for year three, 46 items were audited in six case files. During the assessment Chief

Juriga advised that a full audit will be scheduled to include all evidence and property. The date was to be determined at the time of the assessment.

**36.06M (Assessor: GS)**

Perishable items of evidence are stored in secure refrigerated storage.

Three conflicting policies which pertained to refrigeration after hours. One of the policies referred to a refrigerator that was no longer in service.

- SOP 300.07 – Investigations
- SOP 300.09 – Uniform Patrol
- SOP 100.10 – Property and Evidence

Interviews with several members of the staff indicated that they followed different procedures. One refrigerator was removed from the holding area, and the policy was updated to incorporate current practices.

**36.07M (Assessor: GS)**

A directive outlines procedures for the secure storage of evidence, found, and recovered property when the property room is closed or not accessible by end of tour of duty, to include refrigerated storage.

Three conflicting policies which pertained to refrigeration after hours. One of the policies referred to a refrigerator that was no longer in service.

- SOP 300.07 – Investigations
- SOP 300.09 – Uniform Patrol
- SOP 100.10 – Property and Evidence

Interviews with several members of the staff indicated that they followed different procedures. One refrigerator was removed from the holding area, and the policy was updated to incorporate current practices.

**H. Waiver Concurrence/Nonconcurrence Discussion and Recommendation:**

No waivers requested.

**I. 20 Percent Standards Election (See Section C. for “Tally”)  
Standards Elected for Exemption:**

2.10 (GS)	13.02 (BK)	17.02 (BK)	33.02 (GS)
8.02 (GS)	13.03 (BK)	18.09 (GS)	33.09 (GS)
12.02 (GS)	14.02 (AG)	20.05 (GS)	34.11 (BK)

**J. Standards Verified by the Team as “Not Applicable” to the Agency:**

1.04 (GS)	31.02 (GS)	32.03 (GS)	33.17M (GS)
5.03 (GS)	31.03 (GS)	32.04M (GS)	33.18M (GS)
5.05M (AG)	31.04 (GS)	32.05 (AG)	34.07M (GS)
8.01 (GS)	31.05M (GS)	32.06 (AG)	34.09M (GS)
12.01M (AG)	31.06M (GS)	33.06 (GS)	36.09M (GS)
17.13M (AG)	31.08 (GS)	33.14M (GS)	39.01M (BK)
31.01M (GS)	31.09 (GS)	33.16M (GS)	39.02M (BK)

**K. Standards, the Status of Which, Were Changed by Assessors:**

<u>Standard</u>	<u>Changed From</u>	<u>Changed to</u>	<u>Assessor</u>
<b>5.05</b> The agency does not have auxiliary members.	In Compliance	Not Applicable	GS
<b>12.01</b> The agency does no recruitment activities, therefore, no EEO training is necessary.	In Compliance	Not Applicable	GS
<b>34.11</b>	In Compliance	Elected 20%	GS

**L. Public Information Activities:**

**L-1. Public Information Session:** None.

**L-2. Telephone Contacts Session:** None.

**L-3. Correspondence and Media Interest:**

Letters of Support:

- Chief Brooklen, Miami Gardens Police Department
- Chief Overton, Bal Harbour Village Police Department
- Director Juan J. Perez, Miami-Dade Police Department

**L-4. Follow-up by Assessment Team:** None.

**M. Exemplary Policies/Projects/Procedures:**

The North Miami Police Departments Community Services Section (CSS) has taken an active participant role to improve the quality of life for all the residents, businesses and visitors to North Miami. This role has required the CSS to fully embrace the spirit of community policing. Two strategies that embody this successful endeavor are the Department's devotion to enhance community involvement and the Department's commitment to eliminating blighted property through proactive code compliance initiatives.

One of the major concerns the community presented at various meetings was the blight and urban decay of the neighborhoods. The Police Department merged the City's Code Compliance Unit, Sanitation Unit and Housing Inspection Unit into the CSS of the Police Department in 2013. Since then there has been a 26% increase in the number of annual inspections for code violations, an 840% increase in

multi-family residential buildings inspections, a 701% increase in sanitation inspections and a 52% increase in animal control inspections. Not only did the management of these units by the Police Department lead to significant statistical increases but they also led to a reduction in blighted properties and the fear of crime.

The Code Compliance Unit assisted the Building Department in obtaining several orders from Miami-Dade County Unsafe Structure Board which allowed the City to demolish blighted properties and demonstrated to other owners the City was serious and caused them to voluntarily demolish their blighted properties. In addition, Code Compliance has worked with the City Attorney's Office to have two problematic properties signed over to the City due to extensive code fines and identified several other problematic properties for foreclosure. This provided the results the community desired to see for several years and relieved much of the frustration previously felt about the code compliance process.

In addition, the Code Unit was able to coordinate a public/private partnership to have landscaping placed along the swales in an area that had a history of illegal dumping. The landscaping improvements have eliminated the illegal dumping and continued to improve the relationship between the community and the Department. Capitalizing on these successes, the Department continued to work towards the community's goal of removing blight and improving the welfare of the community. The Department was also instrumental in getting a new web and mobile application that made reporting issues to the City easier and allowed for quicker communication.

The Department also recognized the need to enhance positive working relationships with all members of the community in order to build bridges. The Department engaged the community at all levels. During the summer, the Department established a COPS and Camp program. Officers provided formal crime prevention and safety information, in addition to participating in sporting events with the campers. During the sporting events, the campers were able to interact with the officers on a more personal level and perceived barriers were torn down. The dedication to youth interaction was continued throughout the year with the Department investing in the Police Athletic League (PAL) and Junior Cadet Program. The PAL's peer tutoring program identified students that were successful in school and paired them with other students striving to become successful. The students increased their grade point average by 1 point (a letter grade). The Department also has a strong Citizen's Mobile Patrol Volunteer Program and Chaplain Program. Both programs have built inroads into the community and have established a positive relationship between the police department and the community.

The active community involvement and commitment has led to a reduction of Part I crimes by over 5% from 2013 to 2015 and to the lowest level since 1979, but the even bigger success is the positive relation that has been established in

the community. The police department and the community are both working together to accomplish their common goals of a safer community.

**N. Quality of Law Enforcement Service:** No Chapter Summaries.

**O. Summary and Recommendation:**

**SUMMARY AND OVERALL CONCLUSIONS:** The North Miami Police Department relayed their commitment to accreditation process; this is their fifth reaccreditation. It was evident each member is driven to provide excellent, professional, friendly service to the community.

The agency made great efforts both during and subsequent to the assessment process to make changes to bring the organization up to standards. As soon as areas of deficiencies were discovered, a team with a positive attitude worked diligently to make corrections and adjustments to achieve agency compliance.

The exit interview was attended by Chief Burgess, Assistant Chief Juriga, Assistant Chief Eugene, Sergeant Roman, Accreditation Manager Briganti and the Assessment Team. The team's findings were discussed at length. Due to the fact that many standards were uncompleted and inconclusive, the numbers of non-compliance or corrective actions were unknown.

At that time, the team had made a recommendation to the Executive Staff to consider withdrawing from the process until all standards could be brought into compliance. The Chief asked if the Agency could have time to determine the prospect of bringing the non-time sensitive standards into compliance prior to making the decision to withdraw. The request was granted. Directly after the departure of the Assessment Team an immediate preliminary action plan was made and correspondence with the Team Leader was daily. Pending standards the assessors were unable to confirm prior to their departure were addressed by May 6, 2016. The agency advised that a final action plan addressing the non-compliant standards will be presented to the Commission.

Respectfully Submitted by: Team Leader Gloria Sepanik