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# STAFFING STUDY

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**CIVILIAN POLICE OVERSIGHT AGENCY**

March 2025

## **TABLE OF CONTENTS**

1. Report Highlights .....	1
2. Executive Summary .....	1
3. Introduction .....	2
4. Methodology and Data Sources .....	3
5. Quantitative Analysis .....	4
a. Complaints and Staffing Trends .....	4
b. Caseload Analysis and Investigator Time Allocation .....	5
c. On-Body Recording Device (OBRD) Review Workload .....	7
d. Investigator Tenure and Case Completion Rates .....	9
e. Factors Influencing Case Timelines .....	11
f. Comparative Analysis of Oversight Agencies .....	12
g. Projected Caseload for 2025 .....	13
6. Qualitative Analysis .....	15
7. Recommendations .....	17
a. Hire Additional Investigators	
b. Expand Mediation Program	
c. Convert Timelines to Business Days	
d. Additional Considerations	
8. Conclusion .....	20
9. Appendix .....	21
10. References .....	22
11. Glossary and Acronyms .....	23

## **1 – REPORT HIGHLIGHTS**

- Recent hires at the Civilian Police Oversight Agency (“CPOA”) have reduced investigator caseloads by 32 percent, yet workloads remain at least 1.5 times higher than those of other major civilian oversight agencies. (p. 12)
- Investigator workload is especially high for seasoned investigators because investigators are leaving shortly after they are fully trained and assigned a full caseload, forcing remaining investigators to take on additional cases. (p. 2)
- From 2021 to 2024, investigators reviewed and summarized On-Body Recording Device (“OBRD”) footage in 83% of completed investigations, leaving them with only 2–4 days to focus on other aspects of each case. With a new Special Order now requiring non-evidentiary OBRD to be retained for 13 months, the time spent on OBRD-related tasks is expected to increase even further. (p. 7-8)
- With more time spent in on-the-job training, investigators who have been with the Agency longer are more efficient and less likely to miss deadlines. (p. 9-10)
- Compared with other oversight agencies in consent-decree cities, the CPOA has the shortest turnaround time by at least 60 calendar days. (p. 12)
- If trends persist, the CPOA expects to receive at least 387 complaints in 2025 and will need to make significant hiring or process changes to ensure high-quality investigations are completed timely. (p. 13)
- Our recommendations include (p. 17-18):
  - Hiring 6 additional investigators,
  - Expanding the mediation program,
  - Advocating for a longer turnaround time from 120 calendar days to 120 business days.








## **2 – EXECUTIVE SUMMARY**

This report presents an in-depth analysis of the staffing and caseload trends at the CPOA between 2021 and 2024. In their most recent monitoring report, the Independent Monitor wrote that the CPOA faces persistent challenges in completing their investigations on time, which is “most likely a result of the Agency’s understaffing” (p. 44). Despite a growing investigatory staff, the CPOA carries a backlog of active investigations, due in part to a 35 percent spike in received complaints, staff turnover from 2021 to 2024, increased volume of OBRD footage, and restrictive timelines. Our analysis suggests that in order to maintain work quality and meet timelines, the CPOA will need a budget large enough to hire additional investigators, an expanded mediation program, or a longer turnaround time. Since the beginning of 2025, the Agency has taken measurable steps to improve internal processes and reduce case delays. As of May 2025, we are actively evaluating their impact to determine whether earlier findings and recommendations remain fully applicable.

### 3 – INTRODUCTION

**Investigators, on average, are leaving the CPOA shortly after they are fully trained, leading to reductions in overall productivity, efficacy, and efficiency.**

Empirical research suggests that employee burnout leading to employee turnover has financial and social implications: service quality suffers because the organization loses the institutional knowledge needed to train new hires, new hires may not be able to handle the same workload as more seasoned employees and hiring, in itself, can cost between 16 to 200 percent of annual salaries, depending on the position. At the CPOA, investigator interviews revealed that current investigators struggle with periods of exhaustion or “burnout” and relayed that former investigators stated that workload exhaustion led to their departure. This sentiment is reflected in the CPOA’s employee retention records where, when excluding two long-standing outlier investigators from the analysis, the average employee tenure is 1.73 years. Investigators estimated that it takes 1 year of investigatory work before being fully trained and able to move through investigations efficiently, but investigators are leaving shortly after, burdening other investigators with their caseloads and reducing overall productivity by forcing the Agency to hire and train new staff or seek assistance from external investigative agencies.

Investigator Experience with the CPOA		
Less than 1 year		
1 -2 years		
3 - 4 years		
5+ years		

In an effort to improve its public service, the CPOA has undertaken this staffing study to better understand its staffing needs so that it can reduce employee turnover and, consequently, improve timeliness, productivity, and efficiency.

**The workload-based approach leverages evidence and data to aid in the determination of staffing levels.**

There are four commonly used methods to aid in the determination of staffing levels, especially in the police-setting: the per-capita method, the minimum staffing method, the authorized level method, and the workload-based method.

The International Association of Chiefs of Police (IACP) and the International City/County Management Association (ICMA) discourage the per-capita method, the minimum staffing method, and the authorized level method in staffing studies. The per-capita method determines police staffing based on population size but does not account for seasonal population shifts, officer workload, or community needs. The minimum staffing method sets a baseline number of officers using factors like population and crime rate, but it lacks standardized guidelines and can lead to inflexible staffing requirements. The authorized staffing method, a subset of minimum staffing, is determined by budget constraints rather than actual policing needs.

The workload-based approach is the only evidence-based approach that considers supply of personnel and demand for services. The Commission on Accreditation for Law Enforcement Agencies, the US Department of Justice Community Oriented Policing Service, and ICMA support or prefer this method to the other methods. This method involves leveraging service and personnel data to calculate, on average, how many service calls there are, how long it takes personnel to address them, and how many officers are available to respond to service calls when considering benefit leave time and training time.

According to a scoping review conducted by Griffiths et al. on staffing methods in the medical industry, “there is no basis on which to determine that any system gives the ‘correct’ staffing levels” (Griffiths et al.,

p. 7). In a review of eight select police department staffing studies, it is clear that there is no one-size-fits-all method for identifying the correct staffing levels. However, certain factors may help point the analyst towards the correct method or mix of methods, including:

- Budget constraints
- Jurisdictional population size
- Organizational structure
- Organizational needs beyond its core function (i.e., proactive policing)

#### **4 – METHODOLOGY AND DATA SOURCES**

The CPOA staffing study uses the workload-based approach because the CPOA serves a medium-sized city, the organizational structure is fairly flat, the organization is not looking to expand beyond its core function, and there is concerted interest from the Department of Justice (“DOJ”), Independent Monitoring Team (“IMT”), City Council, and the City for the CPOA to achieve their timeliness obligations. As such, we analyze the supply and demand for services using the data available to us. This includes metrics like investigator staff size, available working days, time spent reviewing and summarizing OBRD, average case completion times and deadlines, and the number and type of complaints received.

While the CPOA can closely estimate the amount of time investigators spend reviewing and summarizing OBRD footage, they cannot do the same for other investigative tasks, such as creating a case plan, preparing for and giving interviews, examining non-video evidence, and documenting their findings. In light of this, we use both the quantitative and qualitative data available to us to determine how long an investigator works on a complaint so that we can better understand how much investigatory work the CPOA is able to supply.

For this staffing study, we used both quantitative and qualitative data sources. All sources used in this study are documented to ensure complete transparency. Our quantitative data covers 2021 – 2024 and comes from 1) IA Pro, which is where the CPOA enters all of the complaint information, their investigatory progress, and key dates, and 2) the CPOA’s internal network drive and 3) City of Albuquerque HR records. Our qualitative data is derived from semi-structured interviews with four CPOA investigators and from email and Zoom conversations had with four other civilian agencies overseeing Departments with consent decrees: the Civilian Complaint Review Board in New York, the Civilian Office of Police Accountability in Chicago, the Office of Police Accountability in Seattle, and the Independent Police Review in Portland.

In addition to gathering original data, we undertook an extensive literature review on approaches to staffing studies. We reviewed more than 10 police department staffing studies, including two concerning the Albuquerque Police Department (“APD”), and academic papers on workload-based approaches to staffing.

The results of this study are intended to provide an impartial and fact-based assessment of CPOA staffing needs. Efforts were made to ensure that interpretations remain balanced and reflective of the data.

## 5 – QUANTITATIVE ANALYSIS

### COMPLAINTS AND STAFFING TRENDS

**The CPOA has been granted a portion of requested additional staff to try to keep up with the growing number of complaints received each year.**

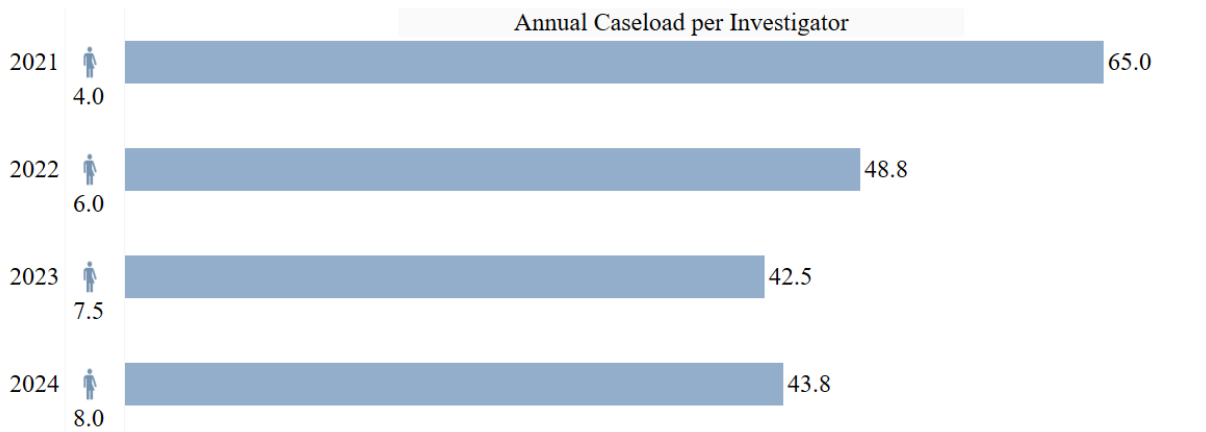
Since 2021, the CPOA received 2,729 complaint notifications and assigned 1,222 complaints to investigators, which, on average, amounts to 305.5 complaint investigations each year. From 2021 to 2024, the number of received complaints steadily increased by 34.62 percent, with the Agency receiving the greatest number of complaints during this study period in 2024. On average, the number of complaints received grew 10.43 percent each year.

1 – Complaints Received and Percent Increase Each Year

Received Year	Complaints Received	% Change
2021	260	-
2022	293	+12.69
2023	319	+8.87
2024	350	+9.72
Total	1222	-

In order to keep up with growing demand for investigative services, the CPOA requested and was granted the budget increases needed to hire some additional investigators, resulting in a 100 percent increase in staff size from 2021 – 2024. Despite a larger investigative staff, the number of complaints received per investigator remains high.

2 – Investigators and Complaints Per Investigator each Year



The number of investigators is an average of the number of investigators that was on staff at the beginning of the year (January 1) and the end of the year (December 31).

## CASELOAD ANALYSIS, INVESTIGATOR STAFFING, AND TIME ALLOCATION

**With a 120-day calendar day turnaround, investigators only have 224 days a year to work on their cases if they take all accrued time including city-granted holidays.**

Unlike annual case assignment trends, caseload paints a clearer picture of workload because it illustrates how many cases an investigator handles at a given time, relative to the number of actual working days available to them. Investigators have a total of 223 to 224 working days available annually, if they take all their accrued vacation and sick leave and observe all City holidays. Investigators gain nearly 20 additional working days each year when they take 25 percent of their accrued vacation and sick days. Across all measures, the number of available working days fluctuates slightly year to year when considering Leap years, newly added federal holidays (e.g., Juneteenth) and holidays that occur over non-working days (e.g., weekends).

3 – Adjusted Working Days by Leave Usage (100%, 50%, 25%)<sup>1</sup>

Year	Adjusted Working Days (100%)	Adjusted Working Days (50%)	Adjusted Working Days (25%)
2021	224.46	236.73	242.87
2022	224.46	236.73	242.87
2023	223.46	235.73	241.87
2024	224.46	236.73	242.87

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<sup>1</sup> 100% denotes the number of working days available to investigators after they have used 100 percent their accrued vacation and sick leave for the year and all City holidays. 50% denotes the number of working days available to investigators after they have used 50 percent their accrued vacation and sick leave for the year and all City holidays. 25% denotes the number of working days available to investigators after they have used 25 percent their accrued vacation and sick leave for the year and all City holidays

**When considering the number of investigators on staff, number of adjusted working days, and the number of complaints received annually, investigators can spend, on average, 4.61 days per complaint.**

Despite additional hires, investigator caseload only allows each investigation less than a week of attention per complaint. According to one investigator, to complete an investigation in a week would mean “there’s a perfect storm of everything to go right at a particular time.”

4 – Caseload when using 100% of Vacation and Sick Leave<sup>2</sup>

Received Year	Complaints per Investigator	Days per Complaint	Caseload (120 days)	Caseload (90 days)
2021	65	3.45	34.75	26.06
2022	48.83	4.60	26.11	19.58
2023	42.53	5.25	22.84	17.13
2024	43.75	5.13	23.39	17.54

To calculate Complaints per Investigator (the average number of complaints completed by an investigator each year), we divide the total number of complaints in a year by the number of investigators that year.

To calculate Days per Complaint (number of days available to spend on a complaint per investigator), we divide the number of available adjusted working days by the number of complaints per investigator in a given year.

To calculate Caseload (the average number of active cases per investigator at a time), multiply the Complaints per Investigator by the number of days each case remains under investigation (assumed 90 or 120), then divide that by the workdays available in a year.

For the purposes of this analysis, we assume 90-day and 120-day investigation periods, with the 90-day allowing sufficient time for case review before the 120-day deadline. While actual case durations vary and average investigation times have exceeded 90 days, this 90-day benchmark allows for direct comparison between years and reflects the optimal timeframe to ensure timely case processing.

<sup>2</sup> Ideally, the Agency should be staffed at a level that investigators are able to use all their vacation and sick time without falling behind, so the analysis assumes investigators will use 100 percent of their vacation and sick time.

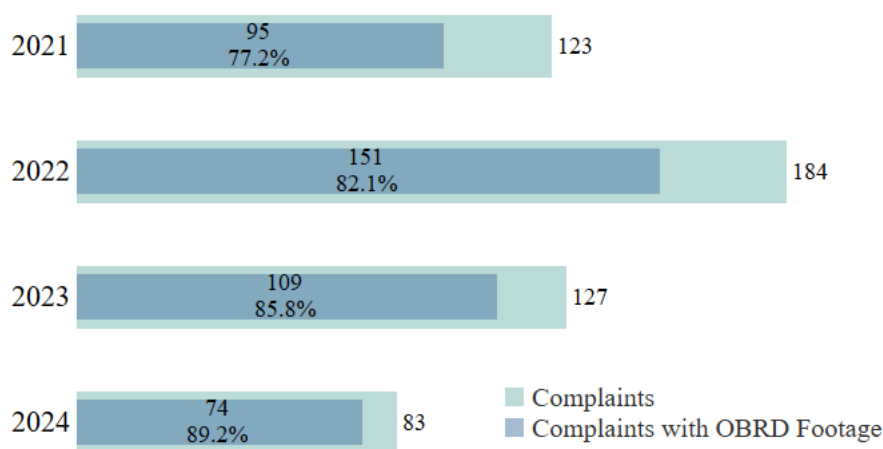


## OBRD VIDEO REVIEW WORKLOAD

**The amount of OBRD for review and summation has grown in volume and duration from 2021 – 2024.**

Nearly 95.55 percent of complaints completed are associated with some video. Generally, most video (in minutes) is OBRD, but there is also other miscellaneous video that investigators may need to review. Nearly 82.98 percent of complaints completed are associated with some OBRD video. We expect that the average amount of OBRD footage for review will stay the same or go up in subsequent years, relative to 2024, because a Special Order was issued in 2024 to extend the retention of non-evidentiary OBRD from 120 days to 13 months.<sup>3</sup>

### 5 – Completed Complaints with OBRD Footage



The amount of OBRD that investigators have to review varies greatly from complaint to complaint. While most complaints are associated with 39 to 44 minutes of video, the average ranges from 94 to 110 minutes. This is because there are extreme outlier complaints that are pulling the average up, like the complaint with 1,311 minutes of OBRD footage in 2024. Given that complaints are assigned to investigators in a rotation, timeliness also depends on the number of time-intensive cases on an investigator's caseload. As is seen in the table below, there are outlier complaints with hundreds of minutes of video that investigators have to review and summarize, so investigators may face challenges with completing their investigations on time if one or more of these types of complaints are assigned to them.

### 6 – OBRD Footage Duration (Minimum, Maximum, Median, Mean) by Year

Received Year	Complaints	Minimum (minutes)	Maximum (minutes)	Median (minutes)	Mean (minutes)
2021	123	0	1106.03	39.24	94.58
2022	184	0	1160.4	41.88	97.16
2023	127	0	960.63	43.9	97.89
2024	83	0	1311.67	41.74	110.31

<sup>3</sup> Previously, the CPOA was unable to access non-evidentiary OBRD for any complaints filed 120 days after an incident.

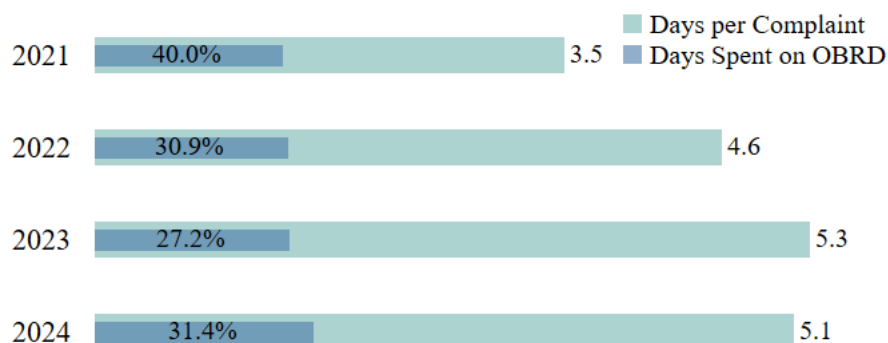
**Reviewing and summarizing OBRD leaves investigators with 2 – 4 days to spend on other aspects of the investigation, like analyzing the allegations, interviewing the complainant and target officers, and writing the report.<sup>4</sup>**

We learned during our interviews with investigators that 10 minutes of OBRD footage amounts to an hour of review and summation. On average during these four years, complaints required *1.38 to 1.61* 8-hour days to review and summarize OBRD. Subtracting the time it takes to review and summarize OBRD from the number of days investigators have to dedicate to a complaint leaves them with 2 – 4 days, depending on the year, to spend on other aspects of the investigation.<sup>5</sup>

Other factors may influence the actual amount of time investigators take to review and summarize OBRD footage, so these estimated figures may be lower than reality. For example, our analysis assumes that all investigators are able to summarize 10 minutes of OBRD footage in an hour, but we learned in our interviews that newer investigators may take longer to complete this workstream and some complaints require additional viewings.

7 – Time Allocation between OBRD and Non-OBRD Activities by Year

Received Year	Complaints	Days per Complaint	Average OBRD per Complaint (minutes)	Days Spent on OBRD (watching and summarizing)	Days Available to Spend on Non-OBRD Tasks
2021	123	3.45	94.58	1.38	2.07
2022	184	4.6	97.16	1.42	3.18
2023	127	5.25	97.89	1.43	3.82
2024	83	5.13	110.31	1.61	3.52



<sup>4</sup> For the OBRD analysis, we only look at completed complaints because in-progress complaints may not have all their supporting evidence stored on our internal server. Additionally, administratively closed or referred to IAPS complaints are removed from the analysis because investigators may not have had the opportunity to conduct a full investigation.

<sup>5</sup> For greater insight into the non-OBRD tasks involved in a complaint investigation and how long they can take investigators, please see Section A of the Appendix “General Process of a Complaint.”

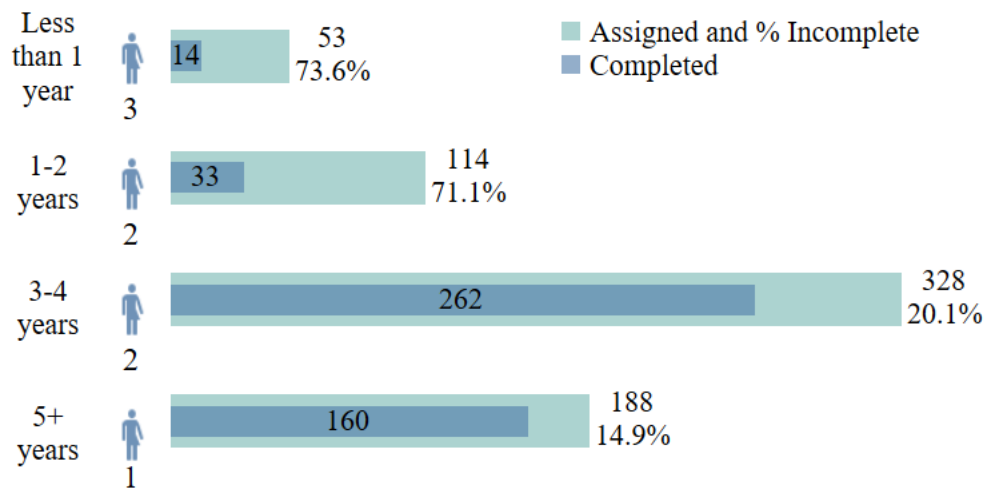
## INVESTIGATOR TENURE AND COMPLAINT COMPLETION RATES

**Newer investigations have a higher rate of incompletion compared to more seasoned investigators.**

Investigators intimated that it takes about a year to be fully onboarded and comfortable with the work. An analysis of investigator tenure and completion rates validates this observation. After removing complaints currently unassigned, of the 8 investigators currently on staff, the rate of incompletion is 3 to 4 times higher for investigators that have worked at the CPOA for less than 2 years when compared with investigators that have been with the CPOA for 3 – 5+ years.

8 – Investigator Tenure and Case Completion<sup>6</sup>

Tenure	Investigators	Completed	Not Completed	Assigned
Less than 1 year	3	14	39	53
1-2 years	2	33	81	114
3-4 years	2	262	66	328
5+ years	1	160	28	188

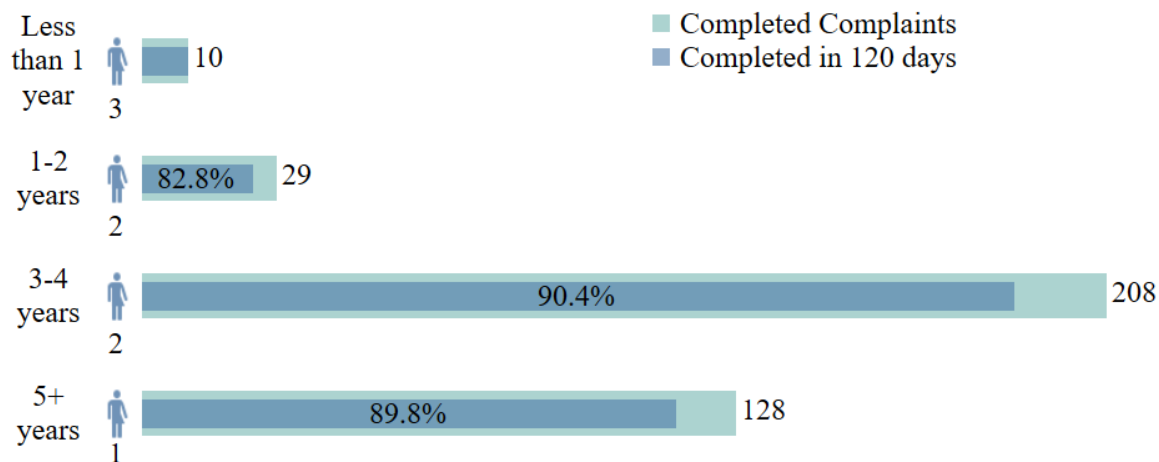


<sup>6</sup> Table only considers data from investigators who were still with the Agency, as of December 2024.

Investigators who have been with the Agency longer (3+ years) and have had more opportunities to miss deadlines are completing their investigations at a higher rate than investigators who have been with the Agency for 1 – 2 years. Investigators who have been with the Agency for less than a year are given less cases which partially explains how they are completing 100 percent of their investigations within 120 days, but the sample size from this group is too small to draw meaningful conclusions from that calculation.

9 – Investigator Tenure and Case Completion within 120 days<sup>7</sup>

Tenure	Investigators	Completed <sup>8</sup>	Completed in 120 days
Less than 1 year	3	10	10
1-2 years	2	29	24
3-4 years	2	208	188
5+ years	1	128	115



<sup>7</sup> Table only considers data from investigators who were still with the Agency, as of December 2024.

<sup>8</sup> The number of complaints completed in this table does not include completed complaints done by investigators that are no longer with the Agency.

## FACTORS INFLUENCING CASE COMPLETION AND TIMELINES

### **The CPOA typically completes their investigations within 120 days.<sup>9</sup>**

From 2021 - 2024, the average number of elapsed days between when a complaint was entered into IA Pro and when the investigator submitted their initial recommended findings was under 120 days. While the average completion timeline for 2022 was greater than 120 days, the median for that year was still under the 120-day deadline, at 119 days. The allotted time for investigatory work remained 120 days (including granted extensions) over the course of this study period, despite changes to the Collective Bargaining agreements and other governing documents.

10 – Case Completion by Year

Received Year	Complaints	Minimum (Days to Complete)	Maximum (Days to Complete)	Median (Days to Complete)	Mean (Days to Complete)
2021	123	34	462	108	108.20
2022	184	29	494	119	127.48
2023	127	6	308	115	115.81
2024	83	14	132	106	97.84
Total	517 <sup>10</sup>	6	494	114	115.27

### **Complaints with more than one implicated employee, more than one allegation, resulting in exonerated dispositions, or alleging force take the longest to complete.**

In interviews with investigators, we learned that the time spent on a single complaint varies depending on the complexity of the complaint, the number of policy violations, and the number of target officers. One investigator stated that a complaint concerning a traffic stop associated with a five-minute long video may only take one week of an investigator's time, if they work exclusively on that investigation. A more complex complaint involving multiple officers and allegations could take between two and three weeks of uninterrupted work. Investigators have to conduct the same tasks (like collect data and interview complainants and targets) regardless of the complexity of the complaint.

We observe in the data the average time to complete a complaint varies depending on how many officers are involved, how many allegations there are, the SOPs involved, and the complaint disposition. For example, 2 – 3+ allegations raise the number of days to complete an investigation from 5 – 8 days. These varied average completion times illustrate how investigators are forced to prioritize certain investigations over others in order to meet their timeliness obligations and how complaint complexity adds to an investigator's caseload.

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<sup>9</sup> Administratively closed and referred to IAPS are removed from the analysis because they do not have allegations for investigators to make initial recommended findings on. Without the initial recommended finding date, the analysis cannot adequately capture the amount of work that goes into these types of investigations. Further, 65.57 percent of complaints not administratively closed or referred to IAPS, so the analysis sample size remains large and representative enough to draw conclusions.

<sup>10</sup> When removing the additional 3 complaints missing the initial recommended finding date, we are left with a sample size of 517 non-administratively closed nor referred to IAPS completed complaints.

## COMPARATIVE ANALYSIS WITH OTHER OVERSIGHT AND OTHER INVESTIGATIVE AGENCIES

Even though Albuquerque has the lowest population of other peer civilian oversight agencies, the CPOA manages the highest caseload and has the shortest turnaround time.

11 – Peer Agency Comparison

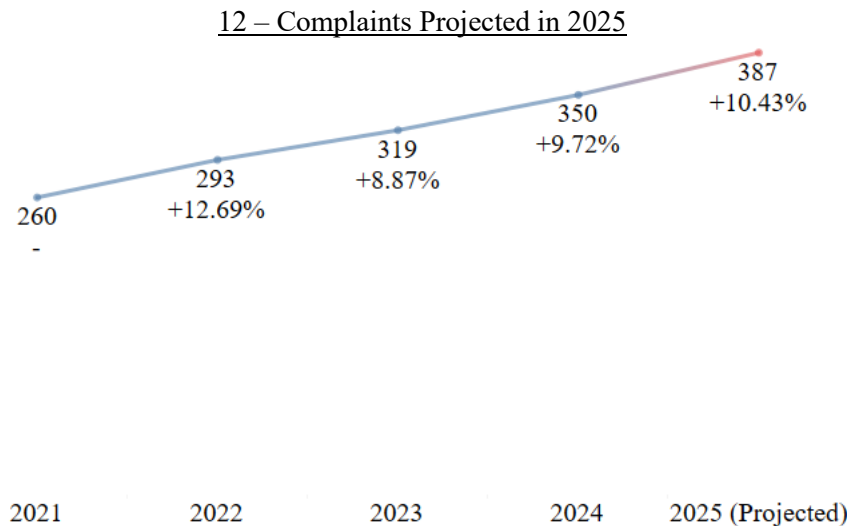
Oversight Agency	Population size (as of 2023)	Investigative staff (as of 2024)	Caseload (rounded, as of 2024)	Case Completion Timelines
<b>Albuquerque</b>	<b>560,274</b>	<b>8</b>	<b>23</b>	<b>120 days</b>
New York	8,258,000	106	15	18 months
Chicago	2,664,000	80	8	18 months
Seattle	755,078	11	6	180 days
Portland	630,498	7	3	180 days

As a local reference, both APD’s Internal Affairs Force Division (“IAFD”) and the Internal Affairs Professional Standards (“IAPS”) have lower caseloads than the CPOA. IAFD reported that, as of December 2024, their caseload was 7 complaints per investigator. IAPS, which reviews all professional misconduct allegations, currently has 13 investigators and maintains a caseload of 10 – 15. However, CPOA workload and IAFD/IAPS workload is not entirely comparable because these other units do not interpret complaints and, in the case of IAPS, receive triage support by assigning investigations to the Area Commands.

## PROJECTED CASELOAD FOR 2025

**In 2025, we expect to assign at least 387 complaints to investigators.**

Since 2021, the number of complaints assigned to investigators has increased linearly. As such, we use a basic linear regression to predict how many complaints we may need to assign in 2025. We reach a similar conclusion when considering that, on average, we receive *10.43* percent complaints more each year. If we received 350 complaints in 2024, then *10.43* percent more complaints amounts to 386.51.



This is a conservative figure, and especially so given that the CPOA will be hiring for a Community Engagement Manager in 2025. The Agency expects that with greater community engagement, more community members will be exposed to the work of the Agency, and, in turn, may lodge additional complaints.

**To maintain timeliness, the CPOA will need to hire 6 additional investigators for investigators to have 10 active complaints and a 90-day turnaround time that accounts for a 30-day review.<sup>11</sup>**

In 2025, we expect, at minimum, 387 complaints for a budgeted 12-person investigative staff. However, two of the budgeted investigative positions are supervisory roles and are not expected to take on full investigative caseloads. As such, the budget currently accounts for 10 investigators.

The calculation used below determines the number of investigators required to handle a specified number of cases in a year based on a desired caseload per investigator, the average time required to complete a case, and the expected total annual workload.

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<sup>11</sup> A 10 active complaint caseload on a 90-day turnaround is the ideal breakdown based on institutional knowledge and investigator experience.

Approximately 16 investigators are needed to manage an annual workload of 387 cases, assuming an average case completion time of 90 days, a desired caseload of 10 cases per investigator, and 224.46 working days in a year.

### 13 – Caseload and Investigators Needed

Desired Caseload	Complaints per year per investigator (rounded up)	Investigators needed (rounded up)
15	38	11
12	30	13
10	25	16
7	18	23

#### Calculation Breakdown

**1. Calculate Cases Completed per Year per Investigator (without Caseload)**

Divide the working days in a year by the average number of days it takes to complete a case. This provides how many cases an investigator can complete in one year if they handle only one case at a time.

$$\text{Cases a Single Investigator can Complete per Year (without caseload)} = \frac{\text{Working Days per year}}{\text{Average Time to Complete a Case}}$$

**2. Adjust for Desired Caseload**

Since each investigator is expected to handle more than one case at a time, multiply the cases a single investigator can complete per year by the desired caseload to determine an investigator's average annual number of completed cases.

$$\text{Cases Completed per Year per Investigator} = \text{Cases a Single Investigator can Complete per Year} \times \text{Desired Caseload}$$

**3. Determine the Total Number of Investigators Needed**

Divide the total number of cases by the average annual number of completed cases of a single investigator to estimate the required number of investigators.

$$\text{Investigators Needed} = \frac{\text{Total Caseload}}{\text{Cases Completed per Year per Investigator}}$$



## 6 – QUALITATIVE ANALYSIS

### **The longer an investigator is at the Agency, the more likely they'll experience burnout.**

At the Agency, complaints are distributed to investigators as they come in on a rotating basis. While fewer complaints are given to newer hires who are on training, generally, investigators are given the same number of complaints while in the rotation. The distribution of cases is at the discretion of the Executive Director. As such, investigator caseloads vary depending on the type of complaints they've been assigned.

Both our quantitative and qualitative analyses suggest that, on average, caseloads aren't manageable and may lead to burnout. Vacation is one way for investigators to avoid burnout, according to an article in the Harvard Business Review, but some CPOA investigators don't feel comfortable taking vacation time. One investigator stated that part of the calculus in deciding to take time off is the time spent thinking about your cases while on vacation and the stress of losing time to work on one's cases.

### **With heavy caseloads, investigators are unable to maximize efficiency when forced to put cases on the back burner.**

Once a complaint is submitted, a strict time table, in accordance with the CBA, begins. In a matter of days, preliminary investigatory work is done on the complaint to decide whether or not the complaint should be assigned to an investigator. If it is, then the investigator has 15 calendar days from the day the complaint was received in the office to identify the target officers and potential SOP violations. As such, as soon as an investigator receives a complaint, they prioritize the initial investigatory work on the new complaint to ensure they meet the timelines set by the CBA. At the CPOA, *"the cases don't stop coming in,"* so older complaints may be put aside to prioritize newer ones. Additionally, in their initial review, investigators evaluate whether or not the complaint may carry sustained violations. If they do, these cases are prioritized and put other complaints, as one investigator said, on the "back burner." Once the investigator revisits a case, they have to refamiliarize themselves, which takes time, in order to accurately complete their report.

### **Collaborating on cases and case specialization may be an inefficient solution.**

When asked about collaboration as a solution to managing heavy caseloads, investigators unanimously agreed that working on investigations in teams or having investigators specialize in certain investigations may be more cumbersome than helpful.

Introducing specialized investigators would, according to investigators, also be inefficient. In this example, investigators pointed out that cases have to be addressed as soon as they come in the door and if a specialized investigator is out of the office or if the position is vacant then those cases won't meet their deadlines.

### **Introducing a lead and senior investigator may cut down on training needs and improve timeliness.**

The CPOA is expected to fill two positions in 2025: a lead investigator and a senior investigator. In addition to supervising investigators, these employees are expected to handle administrative elements of the investigation, like pulling evidence from centralized databases and organizing project folders. The intention is, then, that the investigator can *"just look at the complaint and jump in... They don't have to go look for information."* Some of the systems that investigators pull their data from are difficult to navigate and require additional training so having the supervisory positions assume this responsibility may eliminate training time.

**Advocating for CBA timeline changes may lead to better outcomes for both APD and the CPOA.**

The CBA timelines have not measurably changed in approximately the last two decades, yet the requirements of investigatory documentation and evidence review have changed significantly. As previously stated, investigators need to identify potential SOP violations and send out subject letters to officers within 15 days of receiving the complaint. In order to do this, investigators review the complaint and any APD-related data (e.g., OBRD). Given how time-sensitive this effort is, it is sometimes easier to target all involved individuals, as evidenced from OBRD, and then convert them to a witness later on. This is especially true when the complainant doesn't give the name of an officer but rather details an incident. With more time on the front-end, the CPOA could avoid sending out ultimately superfluous subject letters.

**Some investigators find that training requirements detract from the time needed to spend on their caseload.**

Investigators are required to receive 8 hours of training annually and 40 hours in their first two years of employment. Investigators expressed that when the training is relevant to their work, like a training on a utilized software, they benefit. However, some investigators feel that in order to meet their training requirement that they attend trainings, which then is *"time we can't get back"* to work on cases. As one investigator said, *"a day is crucial for us."*

**Some investigators don't feel like they have time to engage in professional development opportunities.**

According to a Business News Daily article on professional development, employers who offer career-building education opportunities see less employee turnover than employers who don't offer these same opportunities. However, investigators at the CPOA intimated that they often don't feel like they have time to participate in these professional development activities because the *"timelines are everything [at the CPOA]."* Additionally, investigators feel uncomfortable committing to going to a professional development event because they can't control when an officer may be free to schedule an interview and their priority is to conduct the interview and not to attend the engagement.

**A lack of office space has led to an uptick in distractions and a reduction in productivity.**

Presently, 8 investigators share two offices. Every investigator we interviewed expressed that a lack of office space has prevented them from maintaining productivity. Three interviewed investigators said they are able to get more work done than at home because they aren't distracted by their coworkers' conversations or comings-and-goings. On a typical day, one investigator said that you have to check in the morning when others have interviews so that you can flex your work schedule around it.

## 7 – RECOMMENDATIONS

CASA paragraphs concerning CPOA timeliness are still outstanding, so the City of Albuquerque has a vested interest in supporting the CPOA to meet its timeliness obligations in a way that is cost-effective and maintains high CPOA work quality. In 2025, we expect the number of complaints received to be at least equal to that of 2024. This would leave investigators with just 5 days to handle each of the more than 20 complaints on their caseload, approximately 30 percent of which would be spent solely on reviewing and summarizing OBRD footage. Investigators told us that relatively straightforward investigations take nearly a week of attention, so we know that 5 days on a single complaint is not enough. Based on this analysis, the current supply of investigators and demand for services suggests that CPOA investigators are not set up to meet their deadlines.

If they don't satisfy their timeliness obligations, aside from costing the City monitoring fees, the CPOA will have to continue paying external investigators in an attempt to meet as many deadlines as possible. In addition to monetary cost, external contractors don't receive the same training as in-house investigators, so CPOA staff would need to expend extra time managing and reviewing external work product.

These recommendations and considerations are based on data and operational conditions from 2024 and prior. Since then, the CPOA has implemented several internal changes in 2025 aimed at improving investigative efficiency and reducing case delays. As these process improvements continue to take effect, we will revisit and revise our recommendations as appropriate to ensure they reflect the Agency's current capabilities and needs.

### **Expand the CPOA budget to allow for the hiring of 6 investigators.**

The CPOA prioritizes both work quality and timeliness, but work quality supersedes timeliness when heavy caseloads make guaranteeing both untenable. So, as complaints received goes up, the number of investigators needs to go up to maintain work quality and ensure timeliness. Based on institutional knowledge from our own investigators, leaders at peer civilian oversight agencies, and other investigatory entities in Albuquerque, the CPOA expects to meet their deadlines while ensuring a high-quality work product with an investigator caseload of 10 for a 90-day investigatory timeline (accounts for 30 days of Executive Director review). This scenario would require a budget accommodating 16 investigators.<sup>12</sup>

Hiring 6 investigators would be accompanied with salary, operational, and benefit costs. Further, we expect that hiring for existing unfilled positions will cost the City between 16 and 200 percent of annual salaries, according to Government Executive report.

### **Expand the mediation program.**

The CPOA faces a supply and demand challenge that affects its ability to complete investigations on time. Without an increased budget for additional investigators, the Agency will need to reduce the number of complaints it investigates.

One option is to limit investigations to only CASA-related complaints, but this approach would conflict with the CPOA's mandate to "promote accountability of police officers and protect the rights of civilians," as stated in the Ordinance. Public concerns about police accountability extend beyond CASA-related issues. In fact, as noted earlier in this analysis, many of the 10 most frequently reviewed policies are not CASA-

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<sup>12</sup> This budget recommendation does not account for the additional supervisory staff needed for a larger investigatory staff.

related, including those on report writing, emergency warning equipment, bias-based policing, and evidence handling.

A more effective alternative could be to expand the use of mediation. The Ordinance states that “mediation should be the first option for resolution of civilian police complaints.” Currently, mediators—who are not City employees—may conduct 50 sessions per year under the existing \$25,000 budget, with some complaints requiring multiple sessions.

If the Agency expects to receive 387 complaints in 2025, diverting 50 of them to mediation would bring the number of investigations needing attention to 337, which is far from the 250 investigations that current staff size has capacity for. Expanding the mediation program—both to accommodate more cases and to allow for more complex complaints requiring multiple sessions—could help maintain a 10-case workload per investigator while ensuring a 90-day investigation turnaround time. This approach would allow the CPOA to meet investigative demands without compromising its broader commitment to police accountability, but would cost the City increased mediation fees.

**Change the 120-calendar day timeline to a, at minimum, 120-business day timeline.**

The CPOA is held to a 120-calendar day turnaround time, which came into existence decades ago when investigatory burden was far lower. This timeline is the shortest of any oversight agency we consulted, where the next shortest timeline was 180 calendar days, which usually amounts to 120 business days.

In addition to the overall deadline, investigators must also meet shorter interim deadlines, such as issuing subject letters within 15 calendar days. However, as noted earlier in this analysis, a preliminary investigation must first be conducted before subject letters are sent. This process often includes reviewing OBRD footage and speaking with the complainant. While 15 calendar days may seem sufficient, it equates to only 10 working days, assuming no pre-planned leave or unexpected sick days.

The challenge becomes even greater around the winter holidays, when a 120-calendar-day timeline shrinks to approximately 65 business days due to weekends and federal holidays.

Although other investigative bodies within the City, such as IAFD and IAPS, operate under similar deadlines, they face fewer constraints. These agencies have lower caseloads relative to their staff size and, in the case of IAPS, can redistribute investigations to Area Command, providing more flexibility in workload management.

### **Additional Considerations**

In addition to its recommendations, the CPOA has also identified potential considerations that could help improve timeliness and reduce investigative workloads.

**Implement a statute of limitations.**

Investigating complaints filed well after an incident provides a reduced benefit to the community compared to expedient reporting and investigation. The CPOA reflects on sustained allegations when formulating policy recommendations for the APD, and if sustained allegations emerge from complaints filed long after an incident, it is likely that policy changes have already taken effect. Further, sworn personnel targeted in these complaints will have already been on the force and received additional training by the time findings are made and may have already remedied problematic behavior.

Implementing a statute of limitations on how long after a citizen may file a complaint would affect a small number of investigations. Of the completed cases, only 7 percent were filed 250 days after the incident. Even though the effect is small, any reduction in the number of active investigations helps reduce investigator caseload and, in this case, will limit the amount of superfluous work.

Should this consideration be employed, an Ordinance change may be necessary because it implies that the CPOA is expected to investigate all citizen complaints.

### **Permit the CPOA to only investigate select complaint categories**

If the City of Albuquerque cannot increase the number of CPOA investigators to fully meet the rising demand for civilian complaint services, the Agency will need to either reduce the number of cases assigned to investigators or hire additional staff to maintain high-quality work and ensure timely investigations.

To keep caseloads manageable—allowing the 10 budgeted investigators to each handle 10 cases and complete investigations within 90 days—the Agency can assign a maximum of 250 cases in 2025. However, based on complaint data from 2021–2024, the CPOA expects to receive approximately 387 complaints in 2025. This means the Agency would need to reduce assigned cases by 35 percent to align demand with current staffing levels.

One way to achieve this reduction is by limiting the CPOA’s investigative scope. Other civilian oversight agencies, such as Chicago’s Civilian Office of Police Accountability (COPA), have adopted similar approaches, restricting their investigations to specific issues like excessive force, domestic violence, and improper searches and seizures.

However, beyond salary, benefits, and operational expenses, implementing this recommendation would also require outreach, training, and policy adjustments, all of which would incur additional costs. Additionally, limiting complaint categories may reduce community satisfaction with the civilian complaint process.

### **Expand Support Staff and Refine Roles**

As the volume and complexity of investigations increase, the CPOA can improve efficiency by continually refining investigator and staff roles to reduce administrative burden and maximize time spent on substantive investigative tasks. For example, clarifying expectations around evidence collection, routine case documentation, and inter-agency data retrieval could allow lead or senior investigators to absorb time-intensive administrative duties, enabling investigators to focus on core responsibilities such as interviews, analysis, and findings preparation.

Over time, clearly defining and adjusting internal roles can reduce duplication of effort, streamline workflows, and create clearer training paths for new hires. While this approach may not reduce overall caseload, it can reduce the number of days needed to complete each investigation and improve consistency and timeliness in casework. If implemented effectively, role refinement may reduce reliance on external contractors and improve retention by mitigating burnout among investigators and other CPOA staff.

However, while refining roles and responsibilities can improve efficiency and reduce strain on investigators, it is not a comprehensive solution to the growing volume of complaints and may still require a specialized position be added.

## **8 – CONCLUSION**

Charged with investigating all civilian complaints of APD misconduct, the CPOA plays an integral role in holding the police accountable and in enacting police reform. The CPOA is committed to producing high quality work and, despite timeliness issues, the CPOA findings and advisements are 100 percent in compliance with the CASA. However, timeliness issues persist and are highlighted in the latest Independent Monitoring report.

Our analysis suggests that CPOA investigators are held to unrealistic expectations. As of 2024, investigators carry, on average, 23 active investigations at any given time when investigators at other oversight agencies have at most 15 active investigations on their plate at any given time. With under a week to complete an investigation, investigators race against the clock to review and summarize the nearly two days of OBRD footage that is now typical in 2024. It comes as no surprise that investigators are burnt out and likely to leave within less than two years. Vacant positions leave the remaining investigators with additional incoming complaints and complaints left incomplete by their former colleagues.

To reduce employee turnover and ultimately improve timeliness, CPOA investigators need to be set up to succeed. The current caseloads are not tenable, even with investigators expressing they hardly take vacation or sick leave. This analysis provides multiple solutions to lowering investigator caseload, which includes hiring additional investigators, limiting the Agency's investigative scope, expanding the mediation program, or lengthening the turnaround time. All recommendations come with additional costs, but these costs will only bolster further community trust in the CPOA.

## 9 – APPENDIX

### A. General Process of a Complaint

The process for managing complaints varies significantly depending on the complexity of each case. Based on investigator interviews, the general process of a complaint is outlined below.

#### 1. Intake

- **Preliminary Review:** 10 minutes to 1 hour.
    - Initial review of the complaint, assessing case focuses, and reviewing any evidence submitted by complainants.
  - **System Entry:** 15 – 30 minutes.
    - Activities: Input complaint details into the system, ensuring accuracy and identifying involved officers.
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#### 2. Investigation

##### a. Preliminary Detail Gathering

- **Target Letters:** 10–15 minutes, adjusted for multiple subjects.
  - Issued to APD employees within 15 days.
- **Evidence Collection:** 1 hour to 1 hour 30 minutes to gather evidence from various sources (e.g., CADs, Mark43, Evidence.com).
  - Checking for additional video footage, CAD numbers, and related reports,

##### b. Evidence Review: 2 hours or more, depending on the volume of evidence.

- Reviewing and summarizing body-worn camera footage (average of 1 hour per 10 minutes of video), CADs, and incident reports.

##### c. Interviews

- **Complainants:** 15 – 1 hour per interview
- **Officers:** 15 – 45 minutes per interview
- **Witnesses:** 15 minutes per interview
- **Follow-ups:** Each contact attempt takes approximately 5 minutes.

##### d. Summarizing Interviews: 30 minutes to 1 hour 30 minutes per summary.

- Documenting findings from interviews (duplicated for multiple parties).
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#### 3. Documentation of Findings

- **Conclusions and Findings:** 2 hours to several days, depending on the complexity of the case and the number of SOPs involved.
    - Drafting findings, preparing letters, reviewing, and editing.
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#### 4. Review

- **Case Review:** Duration varies, based on case complexity.
    - Activities: Ensuring all documentation and evidence are reviewed thoroughly.
  - **Potential Discipline Recommendations:**
    - Time depends on the nature of the complaint.
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#### 5. Close-Out in IA Pro

- **Final Steps to Close in Internal Affairs Database:** 15 minutes
  - Ensuring the case is complete, sending an email to the supervisor for final review
- **Letters of Findings to Citizen**
- **Potential Non-Concurrence:**
  - Time allocated for responses from involved parties before final closure.

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## 11 – GLOSSARY AND ACRONYMS

<b>Term</b>	<b>Definition</b>
Administrative Closure	The process of closing a complaint without a full investigation due to lack of jurisdiction, evidence, or other administrative reasons.
Backlog	Complaints that remain unresolved beyond the expected investigation timeline.
Collective Bargaining Agreement (CBA)	A contract between the City of Albuquerque and the police officers' union that governs employment conditions, including discipline, investigatory timelines, and officer rights during misconduct investigations.
Completed Investigation	An investigation is considered complete on the date the Findings Letter is sent to the citizen complainant, and the case is closed out in IA Pro.
Consent Decree	A negotiated agreement entered as a court order and enforceable by the court between the City of Albuquerque and the U.S. Department of Justice (DOJ).
Court Approved Settlement Agreement (CASA)	An out-of-court resolution between the City of Albuquerque and the U.S. Department of Justice (DOJ) requiring reforms in police practices, including oversight and accountability measures and resulting in periodic assessment of compliance.
Independent Monitoring Team (IMT)	A federally appointed group responsible for overseeing compliance with the CASA and monitoring CPOA and APD performance.
Initial Recommended Findings	The investigator's preliminary determination regarding a complaint, submitted before final review and approval.
Internal Affairs Force Division (IAFD)	A division within APD that investigates use-of-force incidents involving APD officers.
IA Pro	Internal Affairs record management database.
Internal Affairs Professional Standards (IAPS)	A division within APD responsible for investigating professional misconduct allegations against APD officers and employees.
Mediation Program	A process that allows complainants and officers to resolve complaints through facilitated discussion rather than a formal investigation.
On-Body Recording Device (OBRD)	A body-worn camera used by police officers to record interactions with the public.
Ordinance	A law passed by City government that defines CPOA rules, regulation, purpose, and purview.
Pending Investigation	A complaint that is still under active review by investigators.
Referred to IAPS	When a complaint is forwarded to the Internal Affairs Professional Standards (IAPS) division for internal investigation. These complaints involve non-sworn APD employees, criminal allegations against APD employees, and/or APD employees already involved in a related internal APD investigation.
Sustained Finding	Where the investigation determines, by a preponderance of the evidence, that the alleged misconduct did occur.