SAN FRANCISCO POLICE DEPARTMENT

Collaborative Reform Initiative: Final Report

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January 6, 2025

Chief William Scott
San Francisco Police Department
1245 3rd Street, 6th Floor
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Email: SFPDchief@sfgov.org

RE: California Department of Justice, San Francisco Police Department, and City of San
        Francisco Memorandum of Understanding

Dear Chief Scott:

The California Department of Justice (Cal DOJ) issues this letter along with Jensen Hughes'
final report on the memorandum of understanding (MOU) between the City and County of San
Francisco (the City), the San Francisco Police Department (SFPD or Department) and Cal DOJ.
Our office worked closely with Jensen Hughes on its report, and we adopt the report's contents
and concur in its conclusions. This letter provides Cal DOJ's commentary on its independent
work and oversight.

Background

Cal DOJ, the City, and SFPD entered into a MOU on February 8, 2018, and signed an addendum
that extended the MOU through April 1, 2024. Under the MOU, Cal DOJ has served as an
independent monitor of SFPD's implementation of 272 reforms recommended by the United
States Department of Justice (US DOJ) in its 2016 assessment of SFPD[1] and Jensen Hughes was
hired by SFPD to serve as the expert consultant to assist Cal DOJ in its monitoring.[2] The reform
process involved three phrases, and Cal DOJ and Jensen Hughes issued a report assessing
SFPD's progress in implementing US DOJ recommendations during the course of each phase.
As of the date of the Phase III report, Cal DOJ found that SFPD substantially complied with 245
of the 272 recommendations. For further details on the reform process during these three phases,
please see the Phase III report: https://oag.ca.gov/system/files/media/hillard-heintze-phase3-
report-sfpd-cri-021122.pdf.

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[1] U.S. Dept. of Justice, Office of Community Oriented Policing Services, *Collaborative Reform
Initiative: An Assessment of the San Francisco Police Department* (Oct. 2016),
<https://www.sanfranciscopolice.org/sites/default/files/2018-
11/DOJ_COPS%20CRI_SFPD%20OCT%202016%20Assessment.pdf>.
[2] The MOU came at the request of the City and SFPD for Cal DOJ to step in the shoes of the US
DOJ, after the US DOJ declined to continue with collaborative reform efforts in 2017.

Final Phase

Following the primary three phases of the reform process, SFPD entered into what the parties and Jensen Hughes refer to as the Phase III+ stage. The Phase III+ stage focused on implementation of the remaining 27 recommendations and reviewing SFPD's ability to sustain implementation of recommendations with which Cal DOJ previously determined SFPD was in substantial compliance. As described in more detail in Jensen Hughes' report that accompanies this letter, SFPD has substantially complied with 18 of the remaining 27 recommendations and nine remain in progress amounting to 263 individual recommendations that have now achieved substantial compliance.

SFPD succeeded in achieving findings of substantial compliance with 96.7% of the recommendations under the MOU. This was a significant undertaking that took thousands of hours of work by both internal and external stakeholders, including SFPD sworn and non-sworn personnel, community members, the Police Commission, and the Department of Police Accountability, and that fact alone should be praised. Given this accomplishment, Cal DOJ finds that SFPD has obtained overall substantial compliance under the MOU.

Impact of Reform

While Cal DOJ's conclusion about SFPD's overall substantial compliance does give some understanding of SFPD's progress on reform and the agency's future, a number of measures more clearly illustrate the organizational transformation that has taken place in SFPD:

- SFPD's overall use of force and the use of force rate involving every racial group has declined between 2017 and 2023.

- The yearly average of shootings is down nearly 50% when comparing the number of shootings in 2018, the year SFPD signed its MOU with Cal DOJ, through the present, to the number of shootings between 2011 and 2017.[3]

- Analysis of SFPD's use of force statistics continues to show racial disparities, but the rate that force is used against Black individuals has significantly declined more than the rate of force involving all other races.

There are other examples illustrating the positive shift of SFPD's culture and commitment to progressive constitutional policing. First, as Chief, you demonstrated strong adaptive leadership. As one example, after Cal DOJ concluded at the completion of the first two phases of the reform process that progress on reform was "too slow," you assigned five Commanders to work full-time on the reform process for several months.[4] This was a significant restructuring of SFPD's leadership, and Cal DOJ is unaware of any other law enforcement agency that has dedicated such a significant number of its command staff to reform efforts on a full-time basis. Second, SFPD involved a wide range of personnel to work on the reform process, including line officers, non-

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[3] Specifically, the yearly average from 2018 to present is 3.71 shootings, down 46% from the average of 6.85 shootings a year between 2011 and 2017.

[4] Office of the Attorney General, Letter to Chief William Scott (March 4, 2020) at p. 2. <https://oag.ca.gov/system/files/attachments/press-docs/Final%20Hillard%20Heintze%20Phase%20II%20Report%20for%20the%20San%20Francisco%20Police%20Department-1.pdf>.

sworn personnel, and command staff. This investment into reform across ranks, from the Chief to line officers, encourages systemic cultural change because it ensures that involvement, understanding, and buy-in is aligned both top-down and bottom-up.[5] The SFPD personnel who dedicated hours to implementing recommendations also embraced your adaptive leadership. Third, SFPD committed to meet with Cal DOJ on a twice-weekly basis to go over recommendations in progress and for Cal DOJ and Jensen Hughes to provide technical assistance, as discussed in more detail in our February 11, 2022, Phase III letter.[6] SFPD personnel were receptive to feedback, oftentimes critical, during the course of these meetings. SFPD's prioritization of reform and its openness to an iterative implementation process paid off in an increased rate of substantial compliance of recommendations. Fourth, SFPD has implemented many cutting-edge practices not specifically required by recommendations, but within their spirit. Some examples include: (1) responding to nationally reported incidents of White individuals calling the police on Black individuals for innocent behavior by incorporating the concept of "bias by proxy" in its Bias-Free Policing policy, the first policy of its kind of which Cal DOJ is aware; (2) prohibiting the release of mugshots following the arrest of an individual, with limited exceptions; again, SFPD is one of the first, if not the first, law enforcement agencies in the nation to implement such a policy;[7] and (3) working with community members to develop its Interacting with Transgender, Gender-Variant, and Nonbinary Individuals policy, another policy leading the nation in protecting the dignity of transgender individuals.

Continuous improvement and a commitment to meet, or even set, industry best practices are now embedded within the culture of SFPD, due in large part to this reform process. Several recommendations, and the compliance measures Cal DOJ and Jensen Hughes developed to evaluate substantial compliance, directly require SFPD: (1) to develop mechanisms to review practices for needed improvements[8], and (2) to seek out reforms that are informed by contemporary policing best practices.[9] This reform process has strengthened SFPD's muscle memory around regularly reviewing existing practices and striving to meet or exceed best practices. This is reflected in a number of ways. SFPD implemented a Critical Mindset Coordinated Response Course in response to Recommendations 4.7 and 27.7, which focuses on improving officers' decision-making and coordination to de-escalate incidents and reduce the reliance on force. SFPD credits this course with reducing use of force, and it was selected for a presentation by the 2020 annual conference of a leading industry professional organization, the

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[5] Hamedani, et al., *We Built This Culture (so We Can Change It): Seven Principles for Intentional Cultural Change*, 79 American Psychologist 384, 391-92 (2023.)

[6] Office of the Attorney General, Letter to Chief William Scott (February 11, 2022) at p. 3. <https://oag.ca.gov/system/files/media/hillard-heintze-phase3-report-sfpd-cri-021122.pdf>.

[7] Serrano, *San Francisco police to stop releasing suspect mug shots in effort to prevent racial bias* (Jul. 2, 2020) S.F. Chron. <https://www.sfchronicle.com/crime/article/San-Francisco-police-to-stop-releasing-suspect-15379672.php>.

[8] Recommendations 11.3, 15.2, 32.2, 73.2, 77.1, and 80.2 and accompanying compliance measures.

[9] Recommendations 4.1, 4.2, 6.2, 9.1, 10.2, 11.1, 25.1, 35.1, and 85.1 and accompanying compliance measures.

International Association of Chiefs of Police (IACP).[10] SFPD has also trained 100% of its officers in the Department's 10-hour Crisis Intervention Training (CIT) Field Tactics course and 72% of its officers in the Department's 40-hours CIT course, both of which are beneficial in better equipping officers to interact with individuals in a mental health crisis and provide them the care or services they need.

Cal DOJ credits SFPD for being one of the few agencies that has voluntarily undertaken reform and invited government oversight. Doing so has opened up SFPD to scrutiny and has required SFPD to expend significant time and resources. Importantly, SFPD's proactive efforts have resulted in positive policing outcomes that should be recognized.

Ongoing Work Remains

SFPD has made significant strides in the past few years, but reform, at SFPD and other law enforcement agencies, is an ongoing process.

Racial Disparities in Stops, Searches, and Use of Force

As noted above, there remain significant racial disparities in SFPD's use of force and stops. It is an encouraging sign that these disparities are decreasing but they still exist and must be remedied. Additionally, SFPD must address concerns raised by the Department of Police Accountability when it determined that some officers inaccurately reported the race of stopped individuals in their Racial and Identity Profiling Act stop data entries.

To ensure continued improvement in reducing these disparities, SFPD is undergoing an ambitious project to develop a management dashboard that will seek to identify disparate policing practices. The dashboard would compile a wide range of data and media, including stop data, human resources data, crime data, and body-worn camera activation, to help supervisors better understand officers' conduct in the field, including whether their decisions when interacting with members of the public are potentially motivated by bias. This management dashboard is still in progress, and as Jensen Hughes discusses in its report, Jensen Hughes credits SFPD for developing what could be one of the most innovative tools in the industry. We recognize SFPD's efforts in this area and stress that the Department must continue this work to ensure that it does not regress in reducing disparities.

Impact of External Factors on SFPD's Progress with Reform

SFPD does not have to bear the burden of all of this work. External stakeholders also play a pivotal role in shaping policies that drive the disparities in SFPD's enforcement. Of serious concern to Cal DOJ are recent changes to SFPD's use of force reporting requirements and vehicle policy brought on by Proposition E in March 2024. Proposition E revised SFPD's use of

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[10] Internat. Assn. of Chiefs of Police, *Critical Mindset and Coordinated Response (CMCR) Training: A Vital Step to Reduce Police Shootings* (Oct. 2020) <IACPlearn: Critical Mindset and Coordinated Response (CMCR) Training: A Vital Step to Reduce Police Shootings>. IACP is widely regarded as embracing and encouraging practices are premised on constitutional and progressive policing. Indeed, an IACP representative has presented on reforms to law enforcement raining to California's Little Hoover Commission. Little Hoover Com., Advisory Com. Meeting on California Law Enforcement <https://lhc.ca.gov/events/advisory-committee-meeting-california-law-enforcement-training/>.

force policy, which limits the scenarios when officers are required to write reports on their use of force to the following scenarios: (1) when the use of force results in a physical injury, including where an officer believes the force likely resulted in injury or where a person complains of an injury; or (2) when an officer removes a firearm from their holster and points it at a person or uses it to compel a person to comply.[11] SFPD uses a supervisory use of force evaluation to track use of force data but the above changes to its use of force policy still raise concerns about SFPD's ability to track its use of force in the future and to make changes to reduce concerning trends and disparities. Consistent with your leadership style, you, and other members of SFPD, have expressed commitment to Cal DOJ that SFPD will use other mechanisms, such as technology that reviews body-worn camera footage.

However, Cal DOJ is concerned that the enacted use of force policy changes could have negative impacts on the forward progress that SFPD has made thus far. SFPD utilized use of force data to inform decisions involving use of force, including training needs, and this data-informed decision-making has resulted in positive trends described above. The time SFPD officers devoted to reporting use of force is a worthwhile investment and it remains to be seen what the effects of reducing time to reporting use of force will be. Regardless, it is important for all stakeholders to understand that public safety and progressive policing can and should co-exist together and benefit the entire community.

Future of SFPD's Reform Process

With the completion of this reform process and the exit of Cal DOJ and Jensen Hughes from a direct role overseeing SFPD's reform efforts, SFPD will be solely responsible to manage its police department in a procedurally just manner. Cal DOJ is cautiously optimistic that these reform efforts will be sustained, given the dedication shown by personnel across ranks working on implementation of the recommendations. More importantly, Cal DOJ has observed consistent and indispensable advocacy from members of the public, and effective oversight from the Police Commission and the Department of Police Accountability. These stakeholders are critical to ensuring that the organizational transformation of SFPD continues.

Police reform is neither inevitable nor straightforward. It requires intentionality on the part of a law enforcement agency and significant time and effort. SFPD has undertaken a herculean task, and did so willingly, and has demonstrated that this investment into reform can bring significant

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[11] SFPD's prior use of force policy categorized force into four categories (Types I-IV). Officers were required to prepare a written report for all but Type I use of force.
  TYPE I [Non-Reportable]: Type I force occurs when an officer's physical interaction with a subject (1) is reasonably unlikely to cause pain or injury; or (2) does not cause pain or injury; or (3) the subject does not report pain or injury.
  TYPE II: Force that (1) is reasonably likely to cause pain or injury; or (2) causes transitory physical pain or injury; or (3) the subject reports physical pain or injury. OR Pointing a firearm at a person.
  TYPE III: Force that creates a significant risk of physical injury, other than Type IV force. Any force resulting in serious bodily injury or death is classified as Type IV.
  Type IV: Force that creates a substantial risk of serious bodily injury or death, or that results in serious bodily injury or death. OR Unnecessary force.

positive returns. In fact, other agencies interested in progressive constitutional policing have reached out to SFPD for guidance on proactive reforms. Cal DOJ is hopeful that SFPD's progress continues, so long as SFPD and its stakeholders are steadfast in a commitment to public safety and protecting the rights of all City of San Francisco community members.

Sincerely,

Pamela J. Holmes
Digitally signed by Pamela J. Holmes
Date: 2025.01.04 09:19:03 -08'00'

Pamela J. Holmes
Senior Assistant Attorney General
Police Practices Section

For   ROB BONTA
        Attorney General

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Collaborative Reform: Transforming Policing in San Francisco

EXECUTIVE SUMMARY

This report provides the summary of the last phase of the Collaborative Reform Initiative program in San Francisco. No other major city police department has done what the San Francisco Police Department has – embarked upon a self-directed reform program with independent oversight. Significant work has been achieved across the organization and with measurable results. The SFPD today is focused on community, growth and improvement – with its stakeholders and community partners – in a way the department we first encountered in 2016 was not. This outcome is the result of focus and hard work – from the community, the department's members, governmental partners and stakeholders. As this report outlines, work remains, and the department has committed to continue to work toward its goal of being a model law enforcement agency. However, the organizational focus, internal oversight and management structure will help ensure SFPD will continue to grow and improve as a community-focused, data and standards-driven law enforcement agency.

Background

In 2016, the United States Department of Justice (US DOJ) Office of Community Oriented Policing Services (COPS Office) conducted an assessment of the San Francisco Police Department (SFPD) at the request of the City of San Francisco (City) and the SFPD. The COPS Office published its assessment including 272 recommendations to improve SFPD in five areas: use of force, bias, community policing, accountability, and personnel (recruiting and hiring).[1] The COPS Office later withdrew its support of collaborative reform efforts in all cities in September 2017, leaving the SFPD without an independent oversight process for the reform efforts initiated as a result of the assessment report.

Later that year, the City and SFPD committed to the San Francisco community they would continue the reform efforts. In 2018, they entered into a Memorandum of Understanding (MOU) where the California Department of Justice (CADOJ) agreed to provide technical assistance and independently evaluate SFPD's self-directed reform efforts.[2] The work progressed under the MOU, and Jensen Hughes was engaged to provide independent monitoring services in support of the MOU and to provide technical assistance to the stakeholders to the process. The initial program delivered recommendations designed to increase public trust through improvements in policing practices, transparency, professionalism and accountability. They were informed by national standards, best practices, current and emerging research, and community expectations known to the assessment. Three previous reports have been published under this program documenting the department's progress on implementing the original 272 recommendations.[3, 4, 5]

There has been a sea change in law enforcement and community engagement and expectations for police services since 2016 – when the reform recommendations were drafted. The widespread use of body-worn cameras, the application of technology and the increasing oversight of law enforcement have contributed to improved practices across the law enforcement profession. Across the country, criminal and social justice

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1   **https://cops.usdoj.gov/RIC/Publications/cops-w0818-pub.pdf**

2   The agreement was entered into on February 5, 2018.

3   **https://oag.ca.gov/system/files/attachments/press-docs/hillard-heintze-initial-progress-report-sfpd-phase-i.pdf**

4   **https://oag.ca.gov/system/files/attachments/press-docs/Final%20Hillard%20Heintze%20Phase%20II%20Report%20for%20the%20San%20Francisco%20Police%20Department-1.pdf**

5   **https://oag.ca.gov/system/files/media/hillard-heintze-phase3-report-sfpd-cri-021122.pdf**

advocacy has been at the forefront following the murder of George Floyd by a police officer in Minneapolis and the deaths of other community members, mostly persons of color, as the result of police action. Increased data collection, coupled with the exponential spread of cameras and other technology, have led to discussions and decisions about how law enforcement engages with members of the public and how the police are expected to serve their community.

During the Collaborative Reform Initiative (CRI) time frame, SFPD developed an internal reform management structure that allowed it to move forward with multiple goals within a range of strategic policing domains including use of force, bias, community policing, stops and searches, and accountability. The department has moved from being a primarily paper-driven organization that was insular in its decisions to one that relies on data to inform processes and decisions. There has been a significant investment in developing direct and transparent partnerships with oversight partners including the Police Commission and the Department of Police Accountability. Through three presidential elections, multiple local elections, a pandemic and a period of national civil unrest, SFPD has moved forward, not only in providing service to the San Francisco community, but also in delivering on its reform goals.

Phase III+: Reform Completion and Sustainability

In this final phase of the collaborative reform program, the goal of building and ensuring sustainability for the SFPD's policing and community engagement outcomes achieved under the collaborative reform program was a key focus. Coming into the final phase, there were 27 active recommendations. The work in this phase addressed individual recommendations and established project plans that grouped linked recommendations into five project plans. The implementation and use of technology played a key role in many of these remaining recommendations.

Collaborative Reform Organizational Structure

During this phase, SFPD continued to support the reform and sustainability work through an established organizational structure to support its intentional progression and implementation of reform practices and sustainability review. While this structure has changed throughout the CRI period, it has been critical to ensuring appropriate focus and timeline delivery on reform goals. Leading the reform initiative, the Professional Standards and Principled Policing Unit (PSPP) was tasked with coordinating, collecting and reviewing performance under collaborative reform and was key to the success of SFPD in achieving its goal. As a matter of continued excellence, the ability to maintain focus on the monitoring and evaluation of performance in accordance with SFPD's policing goals will be key. The coordination and direct oversight of the program by a leading unit were key to achieving substantial compliance with the Phase III+ recommendations.

Substantial Compliance Review Recommendations

There were seven recommendations submitted for independent substantial compliance review under this phase of the program. The recommendations were spread across the strategic area topic areas for use of force, community policing and accountability. All seven of these remaining recommendations were determined to be in substantial compliance during this phase, as reported in Appendix B.

Project Plans

SFPD developed five project plans to deliver on the remaining recommendations during this final phase of the collaborative reform program. The plans grouped similar recommendations to more effectively task the

performance of SFPD and to ensure consistency in the outcomes. Four of the five plans were completed and determined to be in substantial compliance with the project goals. The substantially compliant project plans included one that addressed the use of force recommendations, one addressing the community policing engagement recommendations and one addressing the accountability recommendations. The remaining plan addressed the development of a management dashboard to better inform supervisors of employee performance.

The remaining project plan, Project Plan 4, is centered on data-driven leadership and management decisions regarding employee performance. SFPD has invested in developing a comprehensive management dashboard to inform the consistent and transparent evaluation of employee performance and the routine management and oversight of officer activity, including stops. In part, this project plan has not been completed due to the challenges in implementing the technology needed to support the project plan goals and the future management vision of the SFPD. While this plan is not in compliance, the project plan tasking and its timeline identify the department is focused and continues to drive the work to substantial compliance, and the work remaining is discrete and measurable. The parties to the reform project have agreed that SFPD is to establish a routine reporting cadence to the Police Commission, ideally quarterly, to update this oversight body of the progress and remaining tasks under the project until completed. Pursuant to the submitted plan, the completion of the project plan should occur by First Quarter 2026.

Future of Policing in San Francisco

The departmental effort and focus directed at collaborative reform cannot be understated. The initial reported assessment of SFPD derived from the review of a department that is far different from today's SFPD. The City and SFPD, under the oversight and engagement of the CADOJ, undertook an ambitious plan and moved forward through substantial compliance with almost all the original recommendations. There was deep collaboration and focus on achieving a successful outcome, which touched much, if not all, of the SFPD units, with particular emphasis on patrol operations.

The continued focus on model policing practices in San Francisco is supported by an unanticipated strength in that few of the original parties to the agreement and work remain associated with collaborative reform. Since the initial assessment report in 2016, there has been a new Chief, Mayor and Attorney General. Government partners have changed leaders and, in the case of the Department of Police Accountability (DPA), names and jurisdiction. Most of the original command staff attached to the project at SFPD have changed. All the executive staff and many of the current command staff had roles in the development and delivery of collaborative reform. They grew up, so to speak, in a system that demanded accountability and community focus, which bodes well for continued focus on the collaborative reform goals of organizational accountability and community-centered police service delivery. It is anticipated through these and other future leaders, SFPD has developed a culture focused on continuous improvement in its policing practices as a matter of operational priority.

In closing out this project, we would be remiss not to recognize the input and efforts of the San Francisco community and stakeholders that helped us better understand and contextualize the policing issues in San Francisco. Their time, efforts and willingness to work with, support and challenge the SFPD during this project were invaluable – to our team and to the department. While the CRI has been completed, work remains if there is to be continued growth in community partnerships and SFPD's reform culture. It is now up to the City, the department and its stakeholders – both governmental and community – to continue to demand excellence in the delivery of policing services in San Francisco. We believe there is a strong foundation from which to continue to move forward.

Overall Reform Progress

COLLABORATIVE REFORM ORGANIZATIONAL STRUCTURE

Under Phase III+, SFPD continued to support the reform and sustainability goals and work through an established organizational structure that drove intentional progression and implementation of the recommendations. Additionally, PSPP ensured the ongoing implementation of recommendations awarded substantial compliance earlier in the program through sustainability reviews. SFPD recognized early on the need for an established organizational owner to manage the support and coordination of tasking and reporting on progress of the reform goals. The unit also provided consistent tracking, reporting and coordination with the operational units, thereby ensuring a focus on continued compliance that helped SFPD successfully close out the remaining Phase III+ work.

Reform is not organic. Law enforcement agencies already under pressure in delivering services to meet the day-to-day demands of policing struggle to fully engage in the administration of oversight activities. However, under a reform agenda, there is always a constant tension between resourcing service demands and resourcing organizational accountability. Key to the success under collaborative reform was establishing the PSPP to oversee the collective framework of reform. Tasking a specific unit with the coordination, collection and review of performance under CRI helped SFPD in achieving its goal. While there have been several iterations of the unit and its overall responsibilities, the primary role of coordination and collaboration has remained and has contributed to the success of the collaborative reform program. As a matter of ongoing sustainability, the ability to maintain focus on the monitoring and evaluation of performance in accordance with SFPD's model policing goals will be key. Units tasked with operational delivery are often not in the best place to perform this sustainability function. However, SFPD tasked executive sponsors with oversight of each of the reform strategic areas. The assigned executives were able to ensure the compliance work was integrated into the operational work, as a matter of direct involvement and role within the department.

Under the current iteration, the PSPP built upon its coordination role and expanded into a maintenance and review role. Each strategic area had a sustainability manager tasked with partnering with PSPP in developing and sharing materials to inform the completion of open recommendations and the ongoing compliance with those recommendations given substantial compliance by CADOJ. The department seeks to continue the involvement of the executive sponsors to ensure a direct line between the improvement goals and implementation. SFPD will need to examine its future goals and assess the appropriate structure, role and tasking for the continued internal oversight of policing practices. Absent consistent focus on the outcomes achieved under CRI, as seen in other law enforcement agencies once oversight concludes, slippage may occur. However, we note that SFPD has identified its focus on maintenance and growth and is planning for the completion of CRI through actions such as defining the role and responsibility of PSPP under unit level directives and engagement with the existing internal CRI stakeholders.

STRATEGIC REFORM AREAS

The reform program was structured to address strategic areas of use of force, bias, community engagement, accountability and personnel practices. During the overall time frame of the project, key accomplishments were achieved in all strategic reform areas.

Use of Force

In 2016, the SFPD acknowledged it needed a stronger framework for guiding the use of force decisions of officers and particularly so regarding the use of deadly force (OIS). The original assessment identified a department that was challenged to publish or timely revise Department General Orders (DGOs) governing the use, reporting and investigation of force in a manner consistent with expected standards in the profession. In Phase III+, the SFPD has continued to build on the earlier success it achieved in modifying its policies and practices that govern the use of force, including the analysis and review of force incidents to inform the supervision and training of all department members. This outcome is attributable, in part, to improved collaboration with the partners identified in prior assessment reports, including the community, the Police Commission and the DPA. The collaboration has resulted in:

+ A significant drop in the number and severity of OIS incidents.

+ Improved transparency and accountability regarding use of force reporting and supervisor review.

+ Improved training with a better understanding of the impact that police use of force has on the community's perspective of the department's legitimacy.

Use of force is an area of policing that requires ongoing review and practice and policy updates. Work remains in this strategic area, as is identified under the project plans outlined in this report regarding data development and the assessment of force practices across demographics and arrest categories. However, during this overall project, the work and focus of the SFPD team have been impressive, particularly regarding training and improved reporting practices.

Bias

Concerns regarding biased policing, especially when linked to OIS incidents involving persons of color, were identified as a significant challenge for SFPD's effective engagement with the community. Although the department had existing anti-bias policies and practices, they needed reviews and updates to advance practices aimed at reducing biased behavior. Its internal controls on officer behavior also required review and improvement. The department significantly improved its policies and training intended to reduce bias behavior and the influence of implicit bias on officer actions and decisions. During the overall collaborative reform project, SFPD:

+ Published bias-free policing policy and procedures that evolved to be among the best in the profession.

+ Audited and reviewed department communication and devices for evidence of bias.

+ Improved internal and external communication regarding the department's anti-bias goals and the negative impact of bias on community perception of the SFPD.

Bias is a continued foundational challenge for the criminal justice system across America. SFPD remains engaged in delivering on the recommendations focused on identifying causes and connections to police practices to reduce this impact in San Francisco. The work on the Management Dashboard will help provide an overall perspective and awareness, informed by data, on the actions of SFPD officers and the opportunities for improvement in policies and practices and behaviors.

Community Policing

San Francisco is a diverse city, and the direct engagement needs for police services vary based on the unique characteristics of its communities and neighborhoods. The original assessment report determined SFPD's community engagement and outreach was not guided by a strategic framework, which contributed to criticism that community outreach was limited to the discrete efforts of the patrol districts with no input from the communities they served. In addition, some communities, particularly communities of color and the unhoused community, found the department to be unsympathetic to their unique needs for police services. During the overall collaborative reform project, SFPD:

+ Developed a Community Policing Strategic Plan.

+ Required each division or work unit to develop a strategic plan guided by the overall department plan.

+ Created the Community Engagement Division and tasked it with measuring and evaluating the department's community policing outcome.

The work in Phase III+ sought to address the ongoing challenges of ensuring consistent strategic focus and engagement with those communities that do not openly embrace a police relationship. The completion of the strategies and the activation of the Chief's community forum provide a good foundation for continued improvement in this area. Efforts should continue to focus on community engagement with those communities that are not openly supportive of SFPD.

Accountability

The original assessment report identified a department that was siloed relative to internal accountability practices and processes, misconduct investigations, and disciplinary actions against SFPD members. As we end Phase III+, we see a department that has progressed significantly regarding how it receives, reports and investigates reports of police officer misconduct. Notably, we also see a department that has made visible progress in how it interacts with its partners, the Police Commission and DPA. During the overall collaborative reform project, SFPD:

+ Increased transparency in reporting outcomes regarding police misconduct.

+ Developed stronger partnerships predicated upon collaboration and information sharing.

+ Improved internal accountability policies, practices and reviews.

Accountability is more than police misconduct – it is how a department approaches its goals for internal excellence. Under the original assessment report, it was identified that the internal stakeholders did not work together effectively. Under the ensuing work, we saw significant improvements in the processes among internal stakeholders. The San Francisco Police Commission (SFPC), DPA and SFPD all worked throughout CRI to improve coordination, policy and practice, and, ultimately, accountability for SFPD. The SFPC became more visible in its role in holding SFPD to account and in promulgating policy. Efforts were directed at timely updates and revisions of policies in a manner that was sustainable and supported by stakeholders. DPA changed not only its name but its approach to investigating police misconduct with expansions into community outreach, audits and annual reports designed to inform the public on key issues and trends. Among all the stakeholders, we saw improved communication, coordination and transparency as to the issues faced in addressing officer conduct and SFPD policies and practices. SFPD has demonstrated the ability to be strategic and consistent in its focus on internal accountability, looking beyond individual conduct. The use of stakeholder meetings to

discuss trends in discipline and concerning practices is but one example of this work. The increased transparency, productive stakeholder engagement and focus on better understanding officer conduct as seen throughout CRI and in Phase III+ are supportive of continued organizational accountability in the future.

Recruitment, Hiring and Personnel Practices

Today, as in 2016, SFPD is a highly diverse law enforcement agency in comparison to many of its peer organizations. The original assessment noted diversity was not as strong in the higher ranks of the department, something that is consistent across law enforcement organizations. Further, employees reported the processes for advancement were not transparent, and as a result, members felt they did not have the same opportunities as those who were favored. During the overall collaborative reform project, SFPD:

+ Improved its recruiting practices to include significant outreach and improved support practices to help candidates transition to employment with SFPD.

+ Ensured supportive training to help recruits become SFPD officers.

+ Provided transparency in the selection of positions and education or training seen as supportive of promotion through defined application processes. This included published opportunities for training and interviews with the Chief for certain opportunities.

+ Embraced City initiatives focused on increased diversity and inclusion, including its Racial Equity Action Plan (REAP) designed to more broadly open access to opportunities for hiring and advancement.

Much of the CRI work in this area was completed early and included significant changes, including outreach to California's Commission on Peace Officer Standards and Training (POST) to address changes in hiring standards and direct engagement with applicants to help ensure they move through the hiring process. Today, as with many law enforcement agencies, SFPD continues to struggle with recruiting in a time when applications for law enforcement positions are down nationally. The collaborative reform recommendations have provided a good foundation for SFPD to build from to ensure ongoing recruiting strength. The work under REAP includes internal surveys to understand officer perceptions of access to opportunity and advancement. The department implemented an oral interview component to the promotion process, thereby allowing the selection reviewers to understand a candidate holistically rather than their test-taking abilities alone. Additionally, the internal leadership training offered by SFPD is seen as a way to better identify potential future leaders in the SFPD. The work on the employee evaluation system has been engaged in under Project Plan 4. While this has not yet been completed, the department has made substantive progress. The overall work done in Phase III+ in the development of the Management Dashboard will help SFPD achieve this final goal.

PHASE III+ OUTCOMES

The work in Phase III+ was predicated upon the completion of the work required to achieve substantial compliance with the remaining recommendations. As identified, there were seven recommendations to be submitted for individual substantial compliance review, and the remaining recommendations, 20 in all, were grouped into project plans to ensure consistency in the work to complete and in the outcome goals.

Substantial Compliance Review – Recommendations 1.1, 39.1, 40.2, 40.6, 41.1, 55.2, 68.1

There were seven recommendations set for independent substantial compliance reviews under Phase III+. The recommendations covered the strategic reform areas of use of force, community policing and accountability. All

seven of these remaining recommendations were determined to be in substantial compliance. The most significant was the initial recommendation from the assessment report, Recommendation 1.1, which required the SFPD to commit to reviewing the reasons for the disparate use of deadly force by police in San Francisco. As identified in the response to the department's submission in Appendix B, meaningful work has occurred in support of the recommendation. It is anticipated that as SFPD moves forward with the development of the Management Dashboard and the ensuing access to good data, the work of the department will continue in identifying and addressing root causes of police use of force and its disparate impact on certain communities in San Francisco.[6]

The recommendations determined to be in substantial compliance included the following and the specific details of the accomplishments are outlined in Appendix B:

+ Recommendation 1.1, which required SFPD to commit to reviewing the reasons for the disparate use of deadly force by police in San Francisco.[7]

+ Recommendation 39.1 which required SFPD to develop a comprehensive organizational strategic plan for areas including community policing, bias and maintaining diversity within the department.[8]

+ Recommendation 40.2 focused on the development of an overall department strategic community policing plan.[9]

+ Recommendation 40.6 was a time-bound goal to implement a community policing practices review and development process within 90 days of the issuance of the original assessment report. While this time-bound goal was not met, the plan is now in place.[10]

+ Recommendation 41.1 required SFPD to draft a community policing manual in collaboration with the community.[11]

+ Recommendation 55.2 relied on the then existing reporting for the Early Intervention System and recommendations that SFPD develop and report, both internally and externally, on the aggregate data regarding complaints, including intake, outcome and trends.[12]

+ Recommendation 68.1 required SFPD to use its technology strategy to provide data in an easily digestible format to provide management with real-time information to make informed decisions for crime and management strategies.[13]

Compliance with several of the above recommendations exceeds what was originally envisioned, as SFPD has grown significantly in its strategic planning capacity and in its development and use of data.

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6 We note that such transitions are not without challenge, particularly when combining databases. As this report was in editing, errors were identified in the reported RIPA data for 2023. The department has stated the data has been updated and is correct. SFPD should continue to prioritize and ensure focus on accuracy of data, in its current form and as transitioned, to assure the public of its commitment to reform.

7 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket1.1.pdf**

8 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket39.1.pdf**

9 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket40.2.pdf**

10 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket40.6.pdf**

11 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket41.1.pdf**

12 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket55.2.pdf**

13 **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket68.1.pdf**

PROJECT PLANS

The remaining recommendations were grouped into five project plans. Of the five plans, four are compliant as of this report. While significant work has been accomplished, the remaining project plan is defined as "In Progress" and is tied to the completion of the Management Dashboard to achieve substantial compliance. The project plans are detailed in Appendix D.

Project Plan 1: Use of Force and Arrest Data – Recommendations 20.1, 20.2, 20.3[14]

The SFPD established a plan to collect and analyze the use of force data associated with arrest and demographic data. The plan is in part a response to the original assessment report's finding that the department did not capture sufficient data on arrest and use of force incidents to support a strong analysis and review of the data to improve the department's effectiveness. Further, the report identified the severity of an officer's use of force appeared to link to the race of the officer and the subject.

The SFPD committed to analyzing use of force data in response to community concerns regarding force usage and to inform department decisions on policy, supervision and training. To do so, the department recognized it needed to advance its technological capacity to review arrest records, use of force records and incident report records. The ability to conduct an analysis of the records in a uniform manner was challenged because while use of force and incident report records are maintained by the SFPD, arrest or booking records are maintained by the San Francisco County Sheriff Department (SFSD). Unfortunately, a review of the SFSD arrest records revealed that individual arrest records did not reflect when an SFPD officer used force to effect the arrest, nor did the arrest record always have the SFPD incident documented. This was a contributing factor in inaccurate or underreporting of use of force incidents by SFPD officers, leading to collaborative reform recommendations to assist the department in addressing the problem. The initial assessment also identified arrest and use of force records were less reliable because they were not digital.

The department now has a reliable electronic reporting platform for collecting and associating arrest and force data in an incident report, which is stored in the Crime Data Warehouse (CDW) database management system. Officers are now required to complete an incident report when they make an arrest involving the use of force, with specific data captures to inform subsequent review and analysis. In creating the electronic reporting platform, the SFPD can now ensure arrest records and use of force records are appropriately linked.

The Early Intervention System (EIS) Unit conducts a standard audit of use of force data and provides quarterly reports to the Police Commission. In addition, the Field Tactics Force Option (FTFO) Unit reviews use of force incidents to inform policy and training development. Protocols now guide reviews of and reports on arrests involving the use of force.

The SFPD has developed a reliable electronic recording platform that links associated arrest and use of force records with the officer's incident report, which is accessible to department members who will be responsible for reviewing or auditing the records to inform decisions regarding policy, supervision and training. As CRI ends, we advise SFPD to continue to refine protocols for reviewing and reporting on arrests involving the use of force, which is now done on a quarterly basis. As the Management Dashboard is implemented, the department should continue to review what units are best placed to assess data, including arrest and use of force data. As the review practices become institutionalized, the level of training that will be needed for supervisors to consistently

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14 SFPD's Project Plan 1 – **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket20.1.pdf**

analyze arrests that involve the use of force via data reporting and evaluations of probable cause and of other factors that may have contributed to the use of force, including the subject's race, should continue to evolve based on the data developed.

Project Plan 2: Use of Force Analysis – Recommendations 20.4, 21.1, 22.1[15]

This plan explains the department's goal to partner with an external researcher to analyze use of force data defined and stored in the Business Intelligence Dashboard (BID) to identify whether there are patterns or trends in the use of force, especially officer-involved shootings. The initial recommendations were in response to community concerns that SFPD officers engaged in bias-based policing, particularly in its use of force practices. Early in CRI, SFPD partnered with an external researcher to analyze stop data and used the results to inform its anti-bias policy and training. The researchers also helped the department create protocols to assist supervisors in their review of an officer's stop data to identify whether there were patterns or trends that required further review or discussion with the officer.

The department has developed a reliable electronic reporting platform for collecting and associating arrest and force data in an incident report, which is stored in the Crime Data Warehouse (CDW) database management system. Officers are now required to complete an incident report when they make an arrest involving the use of force. The goal of the plan represents the department's sustained commitment to continuous organizational improvement.

The SFPD selected an external research partner[16] to help the department identify risks related to disparities in policing, including "burdensome and inequitable policing" pertinent to the use of force and arrests. This partner previously helped the department develop protocols to identify and reduce disparities in stop data. Although the partnership is in its initial stage, the completed work product will include the identification and analysis of force trends over time and provide the department with tools to address the identified deficiencies in a manner consistent with this recommendation. Based on the prior work, we believe this partnership will help fulfill SFPD's long-term goals in this area of policing.

Under current protocols, the Business Analysis Team (BAT) Unit and the Field Tactics Force Option (FTFO) Unit collaborate to analyze force data and to develop training to remediate any use of force determined to be inconsistent with department expectations and/or policy. FTFO analysis has been used to inform modifications to DGO 5.01 and to the Serious Incident Review Board protocols. The FTFO and BAT Units also reviewed an internal research document that discusses the "Effects of Officer Race on Use of Force Severity," published by a member of the SFPD FTFO Unit. The goal is to use the information learned from this report to augment the development of appropriate strategies to remediate deficiencies and disparities related to the use of force. Under this alternative, audit protocols would be developed and tasked to permit the FTFO Unit to analyze causal factors related to use of force. The FTFO unit will work with the Training Unit to develop training to remediate any use of force determined to be inconsistent with department expectations and/or policy. Under this plan, the SFPD's EIS Unit will continue to conduct monthly audits of supervisors' use of force evaluation reports.

As the Management Dashboard is completed, the department will evaluate the next steps in harnessing the data, analysis and transparency envisioned under the reform goals. As SFPD moves forward, the use of internal resources will need to be prioritized. Consistent with current practice, continued collaboration with DPA

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15 SFPD's Project Plan 2 – **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket20.4.pdf**
16 The Center for Policing Equity (CPE)

regarding audits of use of force should be integrated with current practices to provide a more fulsome perspective on the use of force by SFPD. Consideration might also be given to use of the San Francisco Controller's Office to support audit activity. The goal is to better understand disparities related to race and inform strategies to remediate the identified deficiencies. Transparency, through the regular reporting of force analysis to SFPD stakeholders in a meaningful way, is key to the department's ability to inform its stakeholders on the organizational progress in this key strategic area.

Project Plan 3: Community Policing – Recommendations 26.1, 48.1, 48.2[17]

The SFPD project plan had a goal to sustain community input on policing services across all communities. The work was focused on the development of supportive policies and practices. The foundation for enhanced collaboration was the reinvigoration of the Chief's Community Police Advisory Forum (Advisory Forum) and tasking to the Community Engagement Division (CED).

Police Chief William Scott promulgated the Chief's Community Police Advisory Forum Policy, which guides the mission and goals of the Advisory Forum. The policy identifies criteria for member application and selection and explains that members are expected to advise the Chief on outreach and engagement opportunities and strategies. Policy also provides members guidance on how to successfully engage in problem solving, which is essential to perform the Advisory Forum's mission successfully. The Advisory Forum is uniquely suited to advising the Chief of Police on issues or concerns related to their representative affiliations or community groups. The policy provides that the representatives may include groups based on race, heritage, gender, sexual orientation, faith, youth and business affiliation.

The Advisory Forum meets quarterly and held its first meeting in November 2023. Representatives from the CED are responsible for recording the meeting minutes and coordinating follow-up or further review. The CED administers a post-meeting survey to Advisory Forum members to gain their perspectives of the meetings and to confirm issues requiring further action are identified. Information learned from the survey responses is used continuously to improve the department's community engagement strategies. The SFPD has committed to creating and publishing an annual report to identify the issues raised by or addressed by the Advisory Forum, including their specific input into policies or practices governing the use of force and bias. This report will necessarily be published after this final evaluation of CRI. It is recommended SFPD report out on the annual report of the issues identified to the Police Commission in First Quarter 2025. Such action will provide a foundation for shared engagement focused on action in response to the Advisory Forum's issues.

SFPD identified that engagement and outreach is not limited to one vehicle and that each department unit is required to complete a community policing strategic plan that identifies goals and strategies for their assigned district or focus area. The CED Commanding Officer is tasked with annual audit of the strategic plans to ensure that all department units conduct regular meetings and offer the community multiple and varied opportunities to give input on department operations. This role will be critical in helping SFPD maintain the progress achieved in this area and in ensuring continued support for community engagement.

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17 SFPD's Project Plan 3 – **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket26.1.pdf**

Project Plan 4: Management Dashboard – Recommendations 28.1, 28.4, 28.5, 30.3, 30.4, 35.3, 79.1, 79.2, 79.3[18]

SFPD developed a project plan with the goal of harnessing and improving its overall use and management of data related to its operations and personnel. SFPD began to develop a management dashboard to address recommendations related to the themes of supervision, accountability and professional policing. While the recommendations came from a range of the strategic areas originating from the assessment report, each addresses data collection and management. The management dashboard seeks to provide a range of insight for SFPD leaders, including how officers engage with the public through directed and general activities and performance management, to make informed decisions regarding the policies and practices of the department. Tasking under this project went beyond CRI requirements, as SFPD is seeking to harness and improve its overall use and management of data related to its operations and personnel. In this project plan, SFPD undertakes one of the more challenging issues in law enforcement - managing and tracking officer behaviors through visibility at the micro and macro levels. What makes this plan even more relevant is the goal to identify anomalies and allow managers to determine what level of training, supervision and correction may be necessary as a result, the larger goal being to identify what factors specific to SFPD operations may drive the disparity. As of this report, the department has not completed all identified tasks to complete the plan, although as described below, substantive work has occurred during this final phase.

SFPD developed a strategy that was holistic in its approach – linking similar issues within the recommendations to a directed work focus and flow. SFPD selected an ambitious program to address the lack of data and information coordination – a foundation to substantial compliance with the remaining recommendations and a key link across those contained in this project plan. SFPD did not complete this project during the last phase of collaborative reform, although not for a lack of focus. The department has been actively engaged in the introduction of a management dashboard that will be a direct data pull and warehouse for Racial and Identity Profiling Act (RIPA) data, human resource management system (HRMS), body-worn camera (BWC) footage and crime data. SFPD is using an outside vendor to build the management dashboard and has been engaged to do so since September 2022.

Another component of this project plan is the SFPD's employee performance appraisal program. The department identified that the current reporting form is electronic as of March 2024. SFPD was to publish the notice and form for the current round of appraisals. The Department Notice regarding the electronic form has a production date of June 17, 2024, as does the draft Performance Appraisal Guide. Given this is a matter of collective bargaining, SFPD has engaged in the meet and confer process. The department identifies in its project plan that it will begin using the new performance appraisal form in September 2024 with the goal of a departmentwide launch as of February 2025. A full audit of the program is scheduled for December 2025. We note that the work has been consistent and structured to ensure success. Training has been provided across the department. We anticipate a successful transition to a program that not only better captures data but also helps to document and review employee performance more fully. Front-line supervision is tasked with performance evaluation, and the original assessment identified these reviews were not happening consistently. Any new technology rollout will have bumps – both in how the system is used and in how the underlying tasking occurs. We recommend tracking adherence to the program early on, rather than waiting until December 2025 to audit to ensure compliance with program goals and to avoid unintended consequences.

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18 SFPD's Project Plan 4 – As of the publication of this report, the current In Progress status of Project Plan 4, addressing the development and implementation of the Management Dashboard and an electronic performance appraisal system, is available on the SFPD CRI Documentation Accountability materials here: **https://www.sanfranciscopolice.org/sites/default/files/2024-12/CollaborativeReformProjectPlan4.pdf**. For additional details, please see Appendix D.

During the final phase of this engagement, Jensen Hughes met with the project team and provided technical assistance in reviewing the project goals. As a matter of outcome, SFPD has provided a project plan that identifies tasking and delivery timelines that extend beyond the completion date of this project. The work identified appears to be consistent with the program goals, and the delivery timelines are reasonable and achievable based on SFPD's demonstrated performance in meeting the early goals of the project plan.

To complete this project plan, a critical outcome in both the CRI and the continued success of the department, we recommend the department report quarterly to the SFPC on the project plan, its progress and the mitigation for any delays in completion. The SFPC has an external oversight role for the department's operations and by reporting publicly, SFPD will maintain its focus and fidelity to completing this project plan. PSPP staff will continue to coordinate and work to implement the remaining project components and will be able to report on the audit of the remaining outcomes. This will ensure ongoing accountability and transparency to the commitment made by SFPD regarding this key strategic area of the reform work.

Project Plan 5: Accountability – Recommendations 69.2, 69.3[19]

SFPD began to address discipline in a holistic manner, recognizing that procedural justice requires misconduct to be addressed timely, appropriately and fairly. Accountability and transparency in addressing public complaints is a function of building community trust. Transparency and accountability regarding discipline is equally important in building trust internally with the workforce. The department has moved forward in becoming more transparent internally regarding discipline and in assessing whether there are negative impacts for certain groups within the department as it relates to discipline. This work included the City's 2020 Police Reform Roadmap and the department's internal goals, supported in part by the Racial Equity and Inclusion Action Plan.

SFPD has expanded its capacity for data and its understanding of complaint data. This was key to understanding the nature of the complaints received and how the department manages them. SFPD partnered more fully with DPA. This included involving DPA in training, meetings at the executive and working group level, defining their role in policy development, and providing membership on the Disciplinary Review Board (DRB). This work has also centered on growing one of the assessment report's goals – a shared management environment. While the SFPD and DPA have distinct, independent roles, they share responsibility for managing misconduct investigations and ensuring effective discipline.

As a matter of public transparency, the SFPD shares its complaint information and progress on a quarterly basis with the Police Commission. This data is then published on its website. Additionally, the developing analytical approach to complaint information should make this report more informative and, ideally, user-friendly. The glossary SFPD provides at the end of the report that defines the terms used within the report is also helpful.

During this phase, SFPD established the Office of Equity and Inclusion (OEI) and tasked it through department policy to assess and review the impact of discipline decisions on the various demographic groups represented in SFPD officers. It also serves as a resource for the DRB and can make recommendations for corrective action based on the issues identified. The DRB may make recommendations on process improvements and task recommendations with a timeline for execution. It reports quarterly to the Police Commission relative to recommended changes and the status of implementation.

The department assigned an analyst to the Internal Affairs Division to review and assess discipline data for trends during Phase III+. This role includes analyzing compliance with policy and assessing outcomes. This

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19 SFPD's Project Plan 5 – **https://www.sanfranciscopolice.org/sites/default/files/2024-11/CollaborativeReformCompletionPacket69.2.pdf**

analyst is also tasked with quarterly reports for internal and external use, including reviews and assessments by the OEI. The quarterly report was expanded to address issues for review that speak to internal officer demographics and continues to be refined based on the input of the OEI and DRB. Reviewing the types of complaints and their outcomes is informative to the organizational practice regarding the investigation of misconduct, the investigative finding and the way in which discipline is administered.

While the work of the DRB, OEI and data analysis is relatively new, the documents provided are promising. It is anticipated that SFPD will continue to build upon its goals for internal procedural justice and equity in discipline among officers.

SUSTAINABILITY REVIEW

A key part of the monitoring in Phase III+ was a dip sample review of the 245 recommendations determined to be substantially compliant in the earlier phases. The department recognized that for the community to support its work under collaborative reform, it would need to provide an independent review of the work previously designated as substantially compliant and whether the reforms continued after this determination. To evaluate ongoing compliance with the processes implemented under the recommendations, 30 completed recommendations were selected randomly from each phase of the program and across the strategic reform areas. The goal was to determine whether the work already awarded substantial compliance continued.

The sample accounted for slightly more than 12% of the completed recommendations and included 12 recommendations for use of force, four for community policing, four for bias, eight for accountability and two for personnel practices. The reviews identified SFPD is generally compliant with the requirements of the earlier approved recommendations. The specific files reviewed are outlined below, and the reviews are detailed in Appendix C.

+ **Use of Force Recommendations**: 3.1, 3.2, 4.2, 4.6, 4.7, 5.1, 5.2, 6.3, 8.1, 11.4, 12.2 and 18.1

+ **Bias Recommendations**: 24.3, 27.4, 27.7 and 32.2

+ **Community Policing Recommendations**: 39.8, 40.5, 42.1 and 43.3

+ **Accountability Recommendations**: 56.2, 57.1, 61.1, 63.2, 65.1, 70.1, 70.4 and 72.1

+ **Personnel Practices**: 81.3 and 84.1

Where opportunities for improvement in the ongoing work were identified, the department was responsive and ensured corrective action or improved practice. For example, reporting was not specific to the issue being measured. As of this report, all the SFPD recommendations sampled were in compliance.

The department is successful based on the commitments made to deliver on reform. SFPD has invested in programmatic structures that support reform goals under CRI and long term. In Phase III+, a coordinator to track and report on the ongoing continuity and sustainability of the work under the recommendations already awarded substantial compliance proved helpful. The role maintained ongoing coordination with the operational units and ensured not only focus on ongoing compliance but also adjustments as required by the forward progress of the department. This is a sound investment, as it provides for internal controls and review of the progress reporting provided by the units tasked with implementation. We recommend SFPD assess its current sustainability program and ensure it supports future compliance tracking as the CRI closes out under this phase. While resources are always a challenge, placing resources in alignment with organizational strategy is needed for successful outcomes. Our work here has covered an eight-year period and in this time, the consistent

framework provided by PSPP has been the key success factor. As it moves forward, SFPD needs to ensure this framework is maintained to support continued success.

The community demanded reform, and SFPD has delivered. Community trust is the key outcome measurement under CRI. Maintaining fidelity to the agreed upon reforms, undertaken by the City and SFPD as a matter of commitment to their community, is paramount in maintaining this trust. Continuing the good practices achieved under court-ordered oversight has not been maintained in many law enforcement agencies that have successfully completed an oversight program. These failures come with significant risk and expense, as seen by agencies that have had to extend court-mandated oversight or that have been subject to additional oversight measures. In San Francisco, it is the community and the stakeholders to accountability that hold the oversight role. As CRI concludes, the responsibility will now revert to the governmental systems in place and bolstered through CRI. These systems will need to provide voice, input and partnership with community stakeholders for continued success as SFPD continues to build on its organizational commitment to grow and model police services.

Conclusion

The City of San Francisco, the SFPD, and the community and other stakeholders have accomplished something no other major city police department has been able to do – they voluntarily undertook a massive reform program in a transparent manner. SFPD sought and obtained independent external oversight through an independent evaluation and through CADOJ as a final determination to substantial compliance. What ends is the heightened focus on and funding for reform. Continued institutional progress requires intentionality, particularly for internal accountability to maintain the standards achieved under CRI. Oversight structures, partnered focus, and engagement and accountability at every level for providing police services in San Francisco are predicates to continued success and return on investment for the work under CRI.

The path of reform in San Francisco has been one of local commitment – from the SFPD, the City and the San Francisco communities. As the department moves beyond the CRI, the stakeholders necessarily expand to include all of San Francisco government – the existing partners, the City, SFPC and DPA, including the Board of Supervisors and other governmental units that can rightfully support the continued growth of the department and the overall investment in community support for policing and the reform goals. The department will have to expand its engagement beyond the traditional community partners and extend its efforts to engage with communities that have traditionally lacked trust in the SFPD policing priorities. It is this whole of city approach and commitment that will be required to maintain the focus on continued improvement and sustainability of reform within SFPD.

The initial work and focus arising out of CRI has led to best practice outcomes, identifying SFPD as a model agency. The SFPD has excelled in some areas of reform. Its focus on aligning use of force outcomes to training through an analysis of contributing factors is a best practice. The policies on prohibiting pretextual stops and the refusal to publish booking photos were leading policies with many agencies reviewing their application locally. The early work on responding to individuals in crisis led to a whole of person approach becoming ingrained in the culture of the organization, an outcome of policy, training and management prerogative in ensuring improved responses to persons in crisis.

Moving forward, changes in the department's policing goals and the outcomes will continue as the department and its community shift focus and priorities. Throughout CRI, the department often had to address competing demands in delivering the reform goals, including the resources needed to help manage the reform process.

However, the commitment to improve, to be recognized as a model department and to serve San Francisco's communities has been present throughout. Each stakeholder entity, internal to SFPD, the community and governmental stakeholders have worked to advance safety and security for all of San Francisco. This demonstrated collaboration, transparency and focus on internal and external accountability will continue to support the ongoing commitment to model policing in San Francisco.

Appendices

Appendix A: Findings and Recommendations
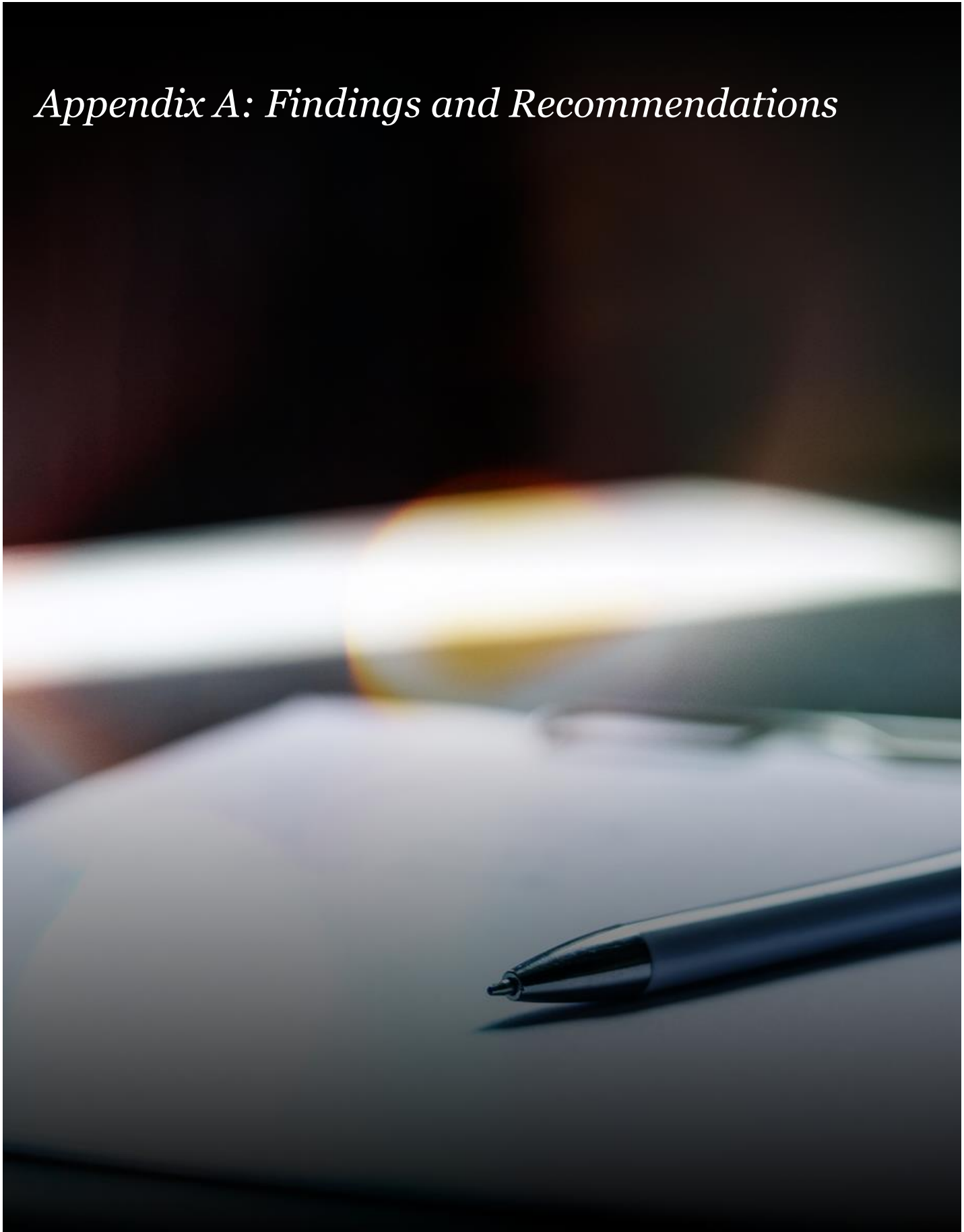
APPENDIX A: FINDINGS AND RECOMMENDATIONS

The U.S. Department of Justice (U.S. DOJ) Office of Community Oriented Policing Services (COPS Office) released *An Assessment of the San Francisco Police Department* in October 2016. The report summarizes the assessment and provides 272 findings and recommendations, which form the basis of this iteration of the SFPD's Collaborative Reform Initiative (CRI).

An Assessment of the San Francisco Police Department is available to **view here**.

The *Phase I Initial Progress Report*, detailing the SFPD's implementation progress for the prioritized recommendations from June through December 2018, was released in May 2019.

The *Phase I Initial Progress Report* is available to **view here**.

The *Phase II – 18 Month Progress Report,* detailing the SFPD's implementation progress for the recommendations from December 2018 through August 2019, was released in March 2020.

The *Phase II – 18 Month Progress Report* is available to **view here**.

The *Phase III – Final Assessment Report,* detailing the SFPD's implementation progress for the recommendations from August 2019 through September 2021, was released in February 2022.

The *Phase III – Final Assessment Report* is available to **view here**.

Appendix B: Phase III+ Recommendation Review

APPENDIX B: PHASE III+ RECOMMENDATION REVIEW

Finding # 1	The majority of deadly use of force incidents by the SFPD involved persons of color.
Recommendation # 1.1	The SFPD must commit to reviewing and understanding the reasons for the disparate use of deadly force. Specifically, SFPD needs to: - Partner with a research institution to evaluate the circumstances that give rise to deadly force, particularly those circumstances involving persons of color; - Develop and enhance relationships in those communities most impacted by deadly officer-involved shootings and monitor trends in calls for service and community complaints to ensure appropriate police interaction occurs as a matter of routine police engagement; - Provide ongoing training for officers throughout the department on how to assess and engage in encounters involving conflict with a potential for use of force with a goal of minimizing the level of force needed to successfully and safely resolve such incidents.

Recommendation Status	<mark>Complete</mark> Partially Complete In Progress Not Started No Assessment
Summary	

This is an original file review, included as part of Project Plan #1. SFPD has committed to ensuring the disparities reflected in police use of force are better understood and addressed within the organizational framework of policy, training and implementation. While not perfect in execution, substantial progress has been made to identify that the department has engaged in addressing the goals of this recommendation and ensuring the forward commitment to continued engagement. The work conducted on the understanding of police use of force is consistent with the overarching goals of Project Plans #1 and #2 – the continued reduction of the need and reliance on the use of force when responding to calls for service and, in particular, with the goal of this recommendation, understanding and reducing the reliance on the use of force when encountering a person of color and engaging more fully with communities of color. With regards to the work on this recommendation, SFPD demonstrates analysis and understanding of the impact of police use of force in communities of color.

With regard to compliance measure # 1, SFPD has identified a series of engagements, internal and with external partners, notably the Center for Policing Equity (CPE), that demonstrates the commitment to understanding disparate police action. This partnership continues, as does ongoing data transparency and internal research and review of use of force factors with the goal of reducing the need to rely upon police use of force. SFPD has committed to educating its command members through training on "race and reconciliation" as a way to improve overall awareness and understanding of the impact of race on police force decisions, as well as general engagement.

As for compliance measure # 2, the CPE partnership is a demonstrated commitment by SFPD. It continues to open its data through its data portal as well. As evidence, a change in SFPD policy regarding when a

weapon was drawn arose in part from a CPE finding. SFPD has invested in internal research and analysis regarding the use of force generally, which supports the larger goal of overall reduced use of force.

As for compliance measure # 3, SFPD committed early on to a best practice of providing information and updates involving a use of force in the area where the incident occurred. These meetings often engage issues beyond the specific incident, and the department has been consistent in its commitment. The department's work in this area has been with traditional community service providers, including those who are seen as challenging the SFPD to include Wealth and Disparities. SFPD was an early law enforcement supporter of Black Lives Matter, with official recognition through the Police Commission. The department has worked to bring the community into its race reconciliation work. Some of this work has emerged into longer-lasting partnerships such as ongoing work in the Tenderloin community. The department has continued to hold districts accountable for partnerships at the community level. As with policing generally, this work continues to have challenges. The long-term success of the reform goals and implementation require SFPD to continue its focus on the community's role in understanding police use of force decisions and the impact of these actions on the community.

As for compliance measure # 4, the department utilizes data other than CAD to determine police interaction, including data provided by the Department of Police Accountability (DPA) regarding complaints, community surveys, and the work ongoing relative to the analysis of use of force and its outcomes. There are future plans to use data in the management dashboard to help assess and identify interactions in communities more broadly. The department has expanded its efforts, and reactivation of the Chief's meetings should also bolster the level of engagement that is the goal of this recommendation. As with all the community engagement called for under the assessment, SFPD's ongoing commitment to broad engagement will help ensure it continues to progress in its goal of being a model police department.

As for compliance measure # 5, this is an area in which the SFPD has exceeded the substantial compliance goals. The Field Tactics and Force Options (FTFO) Unit was an early success in the department's reform path. It continues to grow in its focus and skill. By way of example, the department provides information in the Critical Mindset Coordinated Response training scenarios that incorporate outcomes in prior SFPD and other agency officer-involved shooting incidents (OIS). The team analyzes the factors within an OIS to identify data-based information to incorporate into the overall use of force training. It also uses nationally recognized research and published information to inform the training focus for SFPD officers. The Jensen Hughes team has engaged with the FTFO Unit over the years and has seen the progression of the work on training and how it is responsive to emerging issues and developing training to address it. We recognize the work of SFPD on this issue, and we anticipate its continued investment in training as the leading support for the reduction in the necessity to use force.

As for compliance measure # 6, SFPD data identify while there is a reported reduction in the use of force overall, the force used against African-American/Black people had the most measurable reduction in pointing a firearm. Additionally, the evidence provided by SFPD – and as observed by the monitoring team – was one of continued improvement since 2016. The internal controls and review of use of force have improved to include a training and analysis unit that updates and improves training continuously rather than following a standard use of force training curriculum. Partnership with CPE has improved policies, and the department itself has acted to address issues to understand and reduce both disparity and use of force, for example, the policy that booking photos will no longer be shared. For the three years leading into the

original assessment, SFPD averaged over eight OIS incidents annually; since 2020, that average is closer to three – this equates to less harm for the officers and the public. Trends can alter quickly, so the focus of the department is key in ensuring an ongoing reduction of harm and success in implementing tools that allow for different outcomes than an OIS incident.

It is notable that this is one of the most recent recommendation files to be completed. The compliance with this recommendation has truly been evolutionary since the initial assessment report. This bodes well for future compliance as a matter of organizational investment – this was not a one-and-done approach. Rather, the SFPD continues to review, refine and adapt its approach to addressing disparity in the use of force by SFPD officers.

The Jensen Hughes team recommends a determination of substantial compliance for this recommendation, and it is a pivotal foundational document for the support of the use of force project plans.

	Compliance Measures	Status/Measure Met
1	Commit to reviewing and understanding the reasons for the disparate use of deadly force.	√ Yes ☐ No ☐ N/A
2	Partner with a research institution to evaluate the circumstances that give rise to deadly force, particularly those circumstances involving persons of color.	√ Yes ☐ No ☐ N/A
3	Establish regular and continuous relationships with the goal of enhancing those relationships in communities most impacted by deadly officer-involved shootings.	√ Yes ☐ No ☐ N/A
4	Monitor calls for service and community complaints to ensure appropriate police interaction occurs as a matter of routine police engagement.	√ Yes ☐ No ☐ N/A
5	Provide ongoing evidence-based training for officers throughout the department on how to assess and engage in encounters involving conflict with a potential for use of force with a goal of minimizing the level of force.	√ Yes ☐ No ☐ N/A
6	Continual review/improvement loop to assess goal outcomes.	√ Yes ☐ No ☐ N/A

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 1.1: The SFPD must commit to reviewing and understanding the reasons for the disparate use of deadly force. Specifically, the SFPD needs to:

- Partner with a research institution to evaluate the circumstances that give rise to deadly force, particularly those circumstances involving persons of color;
- Develop and enhance relationships in those communities most impacted by deadly officer-involved shootings and monitor trends in calls for service and community complaints to ensure appropriate police interaction occurs a s a matter of routine police engagement;
- Provide ongoing training for officers throughout the department on how to assess and engage in encounters involving conflict with a potential for use of force with a goal of minimizing the level of force needed to successfully and safely resolve such incidents.

Based on upon all of the above, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.

SFPD has developed an ongoing partnership with the Center for Policing Equity (CPE), a research center based out of Yale University that collects and analyzes data related to law enforcement practices. Among its work with SFPD, CPE has developed a report that examines the factors that trigger or lead to the pointing of a firearm, which escalates the risk of a shooting. CPE recommended that SFPD revise its use of force policy (Department General Order 5.01) to raise the standard for when officers may point a firearm to circumstances where they "reasonably believe that there is a substantial risk that the situation may escalate to the point where deadly force may be justified." SFPD in spirit adopted the recommendation, expanding the circumstances that an officer can point a firearm to include not just when "the situation may escalate to justify the use of deadly force" but also where an officer reasonably believes that "there is a specific and articulable threat of serious bodily injury or death." While the standard CPE recommended is differently worded that SFPD's, in practice, however, they are likely to be the same and should be treated as such as well.

SFPD's 2022 and 2023 shootings have occurred in its busiest stations, Tenderloin, Bayview, Mission, and Southern, as well as Richmond station. SFPD has provided information demonstrating ongoing relationships with community based organizations that work with individuals affected most by fatal shootings by SFPD officers. SFPD has also over time developed the infrastructure to communicate to communities following shootings in a way that is transparent and mindful of the trauma and fear that such shootings sow.

SFPD has also provides training, in the form of its Critical Mindset Coordinated Response training, that incorporate scenarios in prior SFPD and other agency officer involved shooting incidents (OIS). The training emphasizes that each officer has a specific role in a critical incident response, which focuses each officer's decision-making and eliminates what SFPD calls the degradation of an officer's thinking. Cal DOJ recognizes that Jenson Hughes has observed SFPD over

a number of years, since it first assessed SFPD, and defers to its positive assessment of SFPD's training and its determination that SFPD's continued investment in training will lead to the reduction in the use of force.

SFPD has provided data analyses reflecting a steady decline in uses of force, and shootings in particular, in the past several years. As one example, also highlighted by Jenson Hughes, SFPD used to have an average of eight shootings per year and that average has declined to three.

Implementation of this recommendation, and other recommendations related to use of force, is critical for SFPD's legitimacy within its communities. For that reason, Cal DOJ is heartened by SFPD's substantial compliance with this recommendation but recognizes that ensuring SFPD sustains implementation will be the responsibility of SFPD's communities and oversight bodies.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

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██████████

Finding # 39	The SFPD does not have a department-wide strategic plan that articulates a mission and identifies the goals and objectives necessary to deliver overall policing services.
Recommendation # 39.1	The SFPD needs to develop a comprehensive organizational strategic plan with supporting plans for the key reform areas identified within this report specifically directed at community policing, bias, and maintaining diversity within the department.

Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

The SFPD developed three strategic initiatives to demonstrate compliance with the requirements of this recommendation.

Department General Order (DGO) 1.08 Community Policing incorporates the department's Community Policing Strategic Plan and establishes the Community Policing and Problem-Solving Implementation Committee and the Community Policing and Problem-Solving Oversight Committee, both of which meet regularly to ensure the department receives input from the community and external stakeholders, a key component of contemporary community practices.

The department developed DGO 5.17 and the Bias Free Policing Strategic Plan to support its primary goal of eliminating systemic, institutional and individual bias within the department. The strategic plan was developed with input from department members, community members and key stakeholders, including the Police Commission, the Department of Police Accountability, the Public Defender's Office, the San Francisco Bar Association, the San Francisco Youth Commission and the League of Women Voters. This collaborative effort informed practices the department will use to successfully address bias, implicit bias and bias by proxy.

The Office of Equity and Inclusion (OEI) was established (2021) to guide the implementation of the Diversity Strategic Plan, promulgated October 2020. The OEI will assist in educating department members on policy and contemporary practices on racial equity and inclusion, SFPD and City of San Francisco policy, and state and federal Equal Employment Opportunity (EEO) laws. The department's strategic approach to ensuring equity and inclusion for all members is consistent with contemporary practices in the law enforcement profession.

In 2023, Chief William Scott recast Strategy 1.0, the department's strategic vision for ensuring the strategic plans are fully implemented. Thus far, department audits and reviews have focused on ensuring practices, including regular meetings, have resumed after being interrupted by the national public health disruption. Moving forward, Strategy 1.0 and the strategic plans include the audit capability to evaluate the efficacy of the plans in meeting their intended goals, which is integral for ensuring they are institutionalized within the agency.

Compliance Measures		Status/Measure Met
1	Evidence of a comprehensive organizational strategic plan that is informed by contemporary police practices.	√ Yes ☐ No ☐ N/A
2	Includes a plan for addressing community policing that is informed by contemporary policing practices.	√ Yes ☐ No ☐ N/A
3	Includes a plan for addressing bias that is informed by contemporary practices.	√ Yes ☐ No ☐ N/A
4	Includes a plan for addressing department diversity that is informed by contemporary best practices.	√ Yes ☐ No ☐ N/A
5	Review or audit to ensure plans are implemented and evaluate effectiveness.	√ Yes ☐ No ☐ N/A

From:	Tanya Koshy ████████████████████
Sent:	Sunday, July 21, 2024 9:05 PM
To:	Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject:	Recommendation 39.1

[CAUTION - EXTERNAL SENDER] Warning this email comes from an external source.

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 39.1: The SFPD needs to develop a comprehensive organizational strategic plan with supporting plans for the key reform areas identified within this report specifically directed at community policing, bias, and maintaining diversity within the department.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.</u>

The foundational document demonstrating substantial compliance is Strategy 1.0, SFPD's overarching strategic plan, which it developed in 2018 with the help of an external firm. Using this plan as a guidepost, SFPD issued additional strategic plans, including a Community Policing Strategic Plan, a Bias-Free Policing Strategic Plan, and a Diversity Strategic Plan. SFPD has demonstrated that all of these plans were developed with the input and collaboration of a wide range of stakeholders and with best practices gleaned from other agencies in mind.

Since Jenson Hughes issued a Request for Information to SFPD in January, 2024 specifically for Compliance Measure 5, SFPD has demonstrated that it has conducted reviews to ensure the effectiveness of its strategic plans. For example, the Professional Standards and Principled Policing Unit issued Unit Orders 22-01 and 24-01, and under these Unit Orders, documents produced during the Collaborative Reform Initiative—including these strategic plans—will be monitored annually. This, along with other examples provided by SFPD, sufficient for purposes of DOJ's review to demonstrate a review of strategic plans. However, as Chief Scott has aptly observed, while Strategy 1.0 is still relevant, there is a broader need in the future for a review process for all strategic plans. Indeed, Strategy 1.0 is now six years old and, as such, there is a need to consider the development of a new overarching strategic plan in the coming years. But such a need it outside of the DOJ's review and will be the responsibility of internal and external stakeholders to ensure such planning takes place.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

Finding # 40	The SFPD does not formalize community engagement in support of community policing practices.
Recommendation # 40.2	As part of recommendation 39.3, the SFPD should direct the Strategic Planning Steering Committee to develop a strategic plan within six months of the issuance of this report that clearly defines the following:

- The department's vision, mission, and values statements. Once these statements are in place, the committee should establish agency-wide objectives and individual goals as the guiding principles that codify the SFPD's collective beliefs.
- The department's strategic framework for the planning process. This framework will ensure that the process results in a plan that supports the coordination of priorities and objectives across individuals, work groups, and key operating divisions.
- The department's strategy to engage the community, obtain community input, and develop support for the plan and its success.
- The department's strategy to drive the plan down to the officer level by creating objectives that allow for individual goals that contribute to the overall plan.
- The department's measurement processes for individual performance and participation towards accomplishing departmental goals.

Recommendation Status	**Complete**	**Partially Complete**	**In Progress**
	Not Started	**No Assessment**	

Summary

The SFPD introduced Strategy 1.0 to inform internal and external stakeholders of the importance of engaging with the community to reach shared goals. Strategy 1.0 also informed the development of DGO 1.08 Community Policing, which incorporates the department's Community Policing Strategic Plan. The Community Policing and Problem-Solving Implementation Committee, and the Community Policing and Problem-Solving Oversight Committee, are key to the department's strategy to obtain input from the community and external stakeholders to assist in ensuring the goals of the strategic plan are met.

Both DGO 1.08 and the strategic plan explain how district officers are expected to work with community members in their areas to identify and solve issues proactively. Officers and their supervisors will receive training in community policing and problem-solving principles, and the department will develop community engagement evaluation criteria, which will be added to the officer's semiannual performance appraisal.

The strategic plan tasks the Community Engagement Division with conducting monthly reviews and quarterly audits of district stations to ensure the department's community engagement goals are met. Audits completed in the first quarter of 2024 showed all District Stations had developed, with community input, a strategic plan for their area and continued to discuss contemporary law enforcement issues at community meetings and officer lineups. Moving forward, the department intends to use the Community Policing and Problem-Solving Implementation Committee and the Community Policing and Problem-Solving Oversight

Committee to supplement reviews of the department's community policing and engagement initiatives and to extend research to expand existing initiatives or develop new promising initiatives.

	Compliance Measures	Status/Measure Met		
1	Develop a strategic plan that is informed by best practices.	√ Yes	☐ No	☐ N/A
2	Ensure the plan identifies the department's vision, mission and values statements and establish agency-wide objectives and individual goals as the guiding principles that support adherence to the mission, values and guiding principles.	√ Yes	☐ No	☐ N/A
3	The plan identifies the framework for the planning process.	√ Yes	☐ No	☐ N/A
4	The framework results in a plan that supports the coordination of priorities and objectives across individuals, work groups and key operating divisions.	√ Yes	☐ No	☐ N/A
5	The plan identifies the department's strategy to engage the community, obtain community input, and develop support for the plan and its success.	√ Yes	☐ No	☐ N/A
6	The plan identifies the department's strategy to drive the plan down to the officer level by creating objectives that allow for individual goals that contribute to the overall plan.	√ Yes	☐ No	☐ N/A
7	The plan identifies how the department will measure individual performance and participation toward accomplishing department goals.	√ Yes	☐ No	☐ N/A
8	Evidence of review or audit process that evaluates the department's progress in meeting plan goals and objectives.	√ Yes	☐ No	☐ N/A

From:	Tanya Koshy ████████████████████████
Sent:	Sunday, July 21, 2024 9:04 PM
To:	Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject:	Recommendation 40.2

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 40.2: As part of recommendation 39.3, the SFPD should direct the Strategic Planning Steering Committee to develop a Strategic Plan within six months of the issuance of this report that clearly defines the following:

- The department's vision, mission, and values statements. Once these statements are in place, the committee should establish agency wide objectives and individual goals as the guiding principles that codify the SFPD's collective beliefs.
- The department's strategic framework for the planning process. This framework will ensure that the process results in a plan that supports the coordination of priorities and objectives across individuals, work groups, and key operating divisions.
- The department's strategy to engage the community, obtain community input, and develop support for the plan and process.
- The department's strategy to drive the plan down to the officer level by creating objectives that allow for individual goals that contribute to the overall plan.
- The department's measurement processes for individual performance and participation towards accomplishing department goals.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.</u>

Because substantial compliance with this recommendation was contingent on implementing Recommendation 39.3, the DOJ incorporates by reference its email summarizing SFPD's substantial compliance with Recommendation 39.3. That email summary provides detailed information about how SFPD substantially complied with a number of overlapping compliance measures for Recommendation 40.2. Instead, the DOJ focuses here on where this recommendation is distinguishable from Recommendation 39.3. SFPD has demonstrated that its community policing strategic plan as well as Department General Order (DGO) 1.08 has imposed expectations on officers related to community policing, including evaluating officers on community policing in their semi-annual performance appraisal.

DGO 1.08 also requires every Bureau, Station, Unit and Detail to produce annual community policing strategic plans and the Community Engagement Division will meet annual with the Deputy Chief and the Commanders of the Field Operations Bureau (FOB) to review the prior year's community policing strategies, engagements, and outcomes.

This review has been beneficial in identifying and remedying deficiencies, as evidenced by the 2023 review by the Community Engagement Division Commander—Acting Commander Pera. That review revealed that District Stations did not achieve 100% compliance with discussing one of the six pillars of 21st Century Policing at their monthly community meetings. Commander Pera conveyed these results to Deputy Chief Julian Ng and, to remedy the issue, Commander Pera retrained district station captains at the November FOB Captains meeting. This example reflects the importance of continued and regular review of SFPD's community policing strategies and efforts.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

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Finding # 40	The SFPD does not formalize community engagement in support of community policing practices.
Recommendation # 40.6	The SFPD should develop and implement a community policing practices review and development process within 90 days of the issuance of this report so SFPD units can collaborate regarding community policing efforts.

Recommendation Status	**Complete** **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD developed key policies and practices governing community policing and engagement, anchored by DGO 1.08 Community Policing. Section 1.08.04 Community Oriented Policing and Problem Solving describes how internal and external stakeholders contribute to the department's community policing practices. The Community Policing Advisory Board, the Chief's Community Advisory Forums, the Community Policing Problem-Solving and Implementation Committee, and the Community Policing and Problem-Solving Oversight Committee highlight the multiple options the department has created to receive and incorporate the community perspective into department practices. The SFPD seeks to ensure community engagement is institutionalized by requiring all department divisions to develop a community policing strategic plan, which is reviewed and approved by the Community Engagement Division. The Community Engagement Division also works with District Commanders/Captains to ensure ongoing peer-to-peer discussions regarding promising practices that support and promote successful collaborations with internal and external partners.

The department published key policies that support the ongoing review of its community engagement practices, including annual reviews of community policing strategic plans, which are posted on the department's website. The review of district community meetings informed the department's transition to incorporate current content into the discussion of topics important to the community. The department's policies governing community policing affirm the department's commitment to ensuring effective community engagement is institutionalized within the department. Given the evidence submitted and our observations, Jensen Hughes recommends substantial compliance with this recommendation.

Compliance Measures	Status/Measure Met
1 Create a community policing practices review and development process.	√ Yes ☐ No ☐ N/A
2 Process requires department units to collaborate regarding community policing efforts.	√ Yes ☐ No ☐ N/A
3 Implement the process by April 12, 2017.	☐ Yes ☐ No √ N/A
4 Evidence of review process results/actions.	√ Yes ☐ No ☐ N/A
5 Periodic review/improvement loop process.	√ Yes ☐ No ☐ N/A

From:	Tanya Koshy ███████████████████
Sent:	Sunday, July 21, 2024 9:06 PM
To:	Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject:	Recommendation 40.6

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 40.6: The SFPD should develop and implement a community policing practices review and development process within 90 days of the issuance of this report so SFPD units can collaborate regarding community policing efforts.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.</u>

SFPD's substantial compliance with this recommendation largely rests with its issuance of Department General Order (DGO) 1.08. The policy requires two external review committees, the Community Policing and Problem-Solving Implementation Committee and the Community Policing and Problem-Solving Oversight Committee. Both committees are responsible for evaluating the effectiveness of SFPD's community policing efforts and strategies. But the objectives of each are slightly different. The Implementation Committee is responsible for discussing the effectivenss of current community engagement strategies based on community survey feedback while the Oversight Committee is responsible for identifying District Captains engaging in best practices and having them serve as peer-to-peer trainers for other Captains. SFPD also utilizes its monthly Field Operations Bureau Captains meetings to provide internal review of community policing strategies. Finally, the Community Engagement Division Commander biannually reviews the district station captain's community policing efforts. As discussed in more detail in the DOJ's email summarizing substantial compliance with Recommendation 40.2, this process has demonstrably identified and remedied deficiencies.

While DOJ has found SFPD in substantial compliance, these committees described above have only recently begun and thus it is the responsibility of internal and external stakeholders to ensure that SFPD continues these practices.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

Finding # 41	The SFPD's community policing order Department General Order 1.08 – Community Policing (effective 9/28/11) and its Community Policing and Problem Solving manual are out of date and no longer relevant.
Recommendation # 41.1	The SFPD should work with the newly convened Strategic Planning Steering Committee (recommendation 40.2) to draft a new community policing and problem-solving manual for SFPD members within 12 months of the issuance of this report.

Recommendation Status	<mark>Complete</mark> Partially Complete In Progress Not Started No Assessment

Summary

The SFPD completed its work on this recommendation as of February 2024. This recommendation is anchored by DGO 1.08 Community Policing. The work here is also supported by the Community Policing and Problem Solving Manual, which is part of DGO 3.01 and is in the concurrence process, meaning there is an anticipated publication date in 2024. SFPD reports both documents are grounded in its overall strategy – Strategy 1.0 and the Community Policing Strategy. This strategy includes annual reviews of community policing strategic plans, which are posted on the department's website. The department's policies governing community policing affirm the department's commitment to ensuring effective community engagement is institutionalized within the department.

It should be noted there has been a shift since the 2016 findings and recommendations, but this shift supports the long-term goal of a strategic commitment to community policing.

Compliance measure # 1 is fulfilled by Strategy 1.0 with the district community policing strategies. The Community Policing and Problem-Solving Oversight Committee and the respective Implementation Committee are bodies with external stakeholders designed to ensure progress on the strategy and consistency in the department's community policing practices.

Compliance measure # 2 is a relatively recent accomplishment, although work initiated in 2017. A broad review of contemporary practices and leaders was undertaken by SFPD in developing its manual. The evidence presented supports compliance with this compliance measure.

Compliance measure # 3 did not achieve the 12-month implementation time frame. However, the manual is currently going through the concurrence process, with an anticipated publication date of May 28, 2024. While not published, the manual is sufficiently constructed to allow Jensen Hughes to determine compliance will be achieved post-concurrence.

Compliance measure # 4 has been achieved through various DGO publications and work regarding the district community policing process. The department has provided a draft notice, ready for publication once the manual is cleared through the concurrence process.

Compliance measure #5 is reflected not only in the current process of moving the requirements of this recommendation forward but also in the overall SFPD plan and practices for community policing. SFPD has

required training every two years and is tasking the Oversight and Implementation Committees with supporting ongoing reviews of strategy issues.

Given the evidence submitted and our observations, Jensen Hughes believes the department has demonstrated a commitment to compliance with this recommendation. Given the time frame to conclude the formal promulgation of the manual, the concurrence process in particular, will not be concluded by the time the formal agreement terminates. However, we believe the department has achieved substantial compliance with this recommendation. Further, Jensen Hughes will monitor the progression of the manual, which is scheduled ahead of the final report. Upon this achievement, we will confirm the award of substantial compliance with this recommendation.

Compliance Measures	Status/Measure Met
1 Evidence of Strategic Planning Steering Committee work (meeting notes, tasks, timeline, etc.).	√ Yes ☐ No ☐ N/A
2 New community policing and problem-solving manual that is informed by contemporary policies and best practices on community policing.	√ Yes ☐ No ☐ N/A
3 Manual completed by October 12, 2017.	☐ Yes ☐ No √ N/A
4 Evidence of dissemination to members.	√ Yes ☐ No ☐ N/A
5 Periodic review/improvement loop process.	√ Yes ☐ No ☐ N/A

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 41.1: The SFPD should work with the newly convened Strategic Planning Steering Committee (recommendation 40.2) to draft a new community policing and problem solving manual for SFPD members within 12 months of the issuance of this report

For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.

SFPD's substantial compliance with this recommendation rests in part on Strategy 1.0, SFPD's overarching strategic plan, as described in detail in the DOJ's emails summarizing substantial compliance with community-policing recommendations. This year, SFPD completed its Community Policing and Problem-Solving Manual, which uses Strategy 1.0, the Community Policing Strategic Plan and other best practices as framework. As of the date of this email, the Manual is still in concurrence and has not yet been approved by the Police Commission, as is required for all manuals pursuant to Department General Order 3.01. SFPD, however, has provided a roadmap for dissemination of the Manual for members and a review of the Manual through the Professional Standards and Principled Policing Unit Order 22-01. Given that final approval is out of the hands of SFPD but SFPD has completed all steps to develop the Manual, the DOJ agrees with Jensen Hughes that SFPD is in substantial compliance.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

Finding # 55	**The SFPD is not transparent around officer discipline practices. During the community listening sessions and interviews with community members, there was a consistently stated belief, especially in the African-American and Hispanic communities, that officers are not held accountable for misconduct.**
Recommendation # 55.2	Consistent with the current practice on Early Intervention System data, the SFPD should develop and report aggregate data regarding complaints against Department members, their outcome, and trends in complaints and misconduct for both internal and external publication.

Recommendation Status	**Complete** **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD finalized the work on this recommendation as of December 2023. This recommendation addresses the need for transparent, easily understood information relative to personnel complaints. In the last year, SFPD worked diligently to develop report standards. The department hired an analyst to help clean and organize the data to ensure consistency. Internally, working with the Disciplinary Review Board (DRB) and the Internal Affairs (IA) and command staff, SFPD developed a quarterly report that is posted on the website and used internally.

The report consists of a range of data factors that are measured across quarters. The first annual report has not been published as of this review, but it is identified that it will follow a format consistent with the reporting for the prior quarters, including Q2 and Q3 2023. The exhibits supplied by SFPD identify the range of data, including breakdowns by demographics for officers and classifications for complaints.

With regard to compliance measure # 1, SFPD demonstrates compliance through the publication of a unit order that defines the data to be collected.

As for compliance measure # 2, compliance is demonstrated by the examples provided in the attachments, specifically Attachment #5, which depict the published reports.

As for compliance measure # 3, compliance is demonstrated by the submission of the report and its publication internally, as demonstrated through the release to the DRB and on the SFPD website.

Based on our observations and the evidence supported, we determine that SFPD has achieved substantial compliance with this outstanding recommendation.

Compliance Measures		Status/Measure Met
1	Develop report standards.	√ Yes ☐ No ☐ N/A

2	Populate report with aggregate data, including trends and outcomes with respect to complaints and misconduct.	√ Yes □ No □ N/A
3	Publish report for internal and external publication.	√ Yes □ No □ N/A

From: Tanya Koshy ████████████████████████
Sent: Sunday, July 21, 2024 9:05 PM
To: Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc: Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject: Recommendation 55.2

[CAUTION - EXTERNAL SENDER] Warning this email comes from an external source.

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 55.2: Consistent with the current practice on Early Intervention System data, the SFPD should develop and report aggregate data regarding complaints against Department members, their outcome, and trends in complaints and misconduct for both internal and external publication.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.</u>

SFPD's Internal Affairs Division (IAD) issued an Order (23-01) requiring the IAD to prepare a quarterly and annual report that includes aggregate data on complaints against SFPD members, including outcomes of those complaints and trends. SFPD provided an example of the quarterly report developed pursuant to Unit Order 23-01. While SFPD produced just one example, the DOJ reviewed SFPD's website and identified that it has continued to issue these quarterly reports as well as the annual report in 2023. The report for the first quarter of 2024 includes aggregate data and section on trends, comparing data from quarter 1 of 2023 through quarter 1 of 2024. SFPD has thus demonstrated substantial compliance with this recommendation. Although not required by this recommendation, SFPD should also consider providing the public information as to how it would address or has addressed concerning trends in its annual reports.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice
████████████
██████████████████

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or

Finding # 68	The SFPD has poor data collection and analysis, which significantly impacts effective overall organization management and accountability. The technology in the SFPD requires significant updating. However, poor data collection practices, including lack of supervisory review and accountability for improperly completed reports and form sets, contributes to the poor data environment.
Recommendation # 68.1	As part of its technological capacity improvement strategy, the SFPD should develop a plan to advance its capacity to digest information it currently possesses in a consistent, easily accessible format such as a template containing key data points including officer performance indicators and crime indicators that could provide management with real-time information to inform their practice.

Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

The SFPD Technology Division was restructured after the initial assessment to include the goals of this recommendation – evidencing a commitment to improving data collection and analysis through supervisory review and accountability. Since the initial assessment, SFPD has undertaken the job of automating most of its key data, including crime reporting, use of force, management and general statistical reports. Part of its work driving compliance with this recommendation is centered on the SFPD's Business Intelligence (BI) data warehouse, which holds most of the electronic data collected by SFPD, including those reports and forms that were not digital. The BI data warehouse contains key data points for officer performance indicators and crime indicators. This data is accessible to the department members, including supervisors, through a software interface. It is operated and maintained by the division's Business Intelligence and Geospatial Technology Team. The data is loaded daily to facilitate timely analysis, review and ability to engage. The SFPD Officer Dashboard, containing officer performance indicators and crime indicators, was developed and is stored in the warehouse. This system has provided data for 272 U.S. Department of Justice (USDOJ) recommendations (including 68.1), Stop Data Collection System (SDCS), Crisis Intervention Team, Use of Force, Crime Statistics, Investigations, Language Assistance Services, the Academy and many more departments throughout the SFPD.

It should be noted that this recommendation continues to be improved upon by SFPD, and the work is being further expanded as the department works on its efforts in Project Plan #4, which anticipates an evolution in the officer performance dashboard. These actions reflect the commitment to ongoing improvement of the link between information and effective management has been embraced and furthered by SFPD's work to deliver on this recommendation.

With regard to compliance measure # 1, all officers, including supervisors, are thoroughly trained at the academy and through department bulletins on how to enter data and its importance. Early in the original assessment, SFPD did not have strong quality controls on data reporting, and it was reflected in the status of the data. SFPD committed to training and holding supervisors to account for accuracy in data reporting as

demonstrated by the overall quality of the data and the review/control practices now seen. Early on, the Business Intelligence and Geospatial Technology Team engaged directly with SFPD members to gauge and assess their need for and use of data.

As for compliance measure # 2, in 2016, the concept of consistent data, electronically generated and derived, did not exist at SFPD. Today, SFPD members have a range of reports and data they can directly access with minimal time engagement and get detailed information specific to their inquiries and needs. SFPD provides examples of the type of data available to officers. These reports are often calibrated based on rank, unit, overall security, and compliance with policies and laws.

As for compliance measure # 3, the Business Intelligence and Geospatial Technology Team conducts training for all department members, which includes supervisors, relative to the collection and reporting of data and how and where to access it within the department's systems. These trainings are either one-on-one trainings or large classes held at the SFPD Academy. The goal is to ensure all SFPD members have a basic understanding of the BI tools available to them as they move on to supervisory roles throughout their careers. SFPD provides examples of existing tools and tips, in addition to newer requests for support relative to the procedures and data available.

As for compliance measure # 4, the Business Intelligence and Geospatial Technology Team provided evidence of the development and retention of documentation and guides for all dashboards available to department members, in addition to providing group and individual training year-round. Documentation is also embedded in each BI dashboard. This compliance measure has assumed less priority now that information on how to use department systems is provided to all SFPD members upon hire and is reinforced through ongoing in-service training and other training. SFPD is now a department that uses data consistent with standard law enforcement practices. The work to embed this foundational drive is the result of the work conducted under this recommendation. The team provided a reference to a specific training that demonstrates BI and explains its relevance and usage, including how to build reports for specific needs (i.e., creating a UCR crime count, NIBRS crime count, etc.)

As for compliance measure # 5, the Technology Division requests all feedback and questions be emailed to the Business Intelligence and Geospatial Technology Team for continuous improvements. The oversight team has observed engagement with operational units in the development of reports specific to a unit or required for compliance with the assessment. The Technology Division has issued a unit order that establishes a process to provide a quality assurance and continuous improvement loop for BI dashboards and reports using surveys sent out to department members on specific cycles. Finally, new reports and systems continue to be developed. As identified, the work occurring in Project Plan #4 with the expansion of the management dashboard is an extension of the goal and a focus of this recommendation.

It is notable that this is one of the most recent recommendation files to be completed. The work on this recommendation has been embedded in much of the SFPD's work in achieving overall compliance since the initial assessment report. This bodes well for continued improvement and compliance as a matter of organizational investment, as data collection, analysis and informed management action are key to a professional, model police department.

The Jensen Hughes team recommends a determination of substantial compliance for this recommendation.

Compliance Measures		Status/Measure Met
1	Engage supervisors to understand the data needs for operations.	√ Yes ☐ No ☐ N/A
2	Develop report templates with key data collection factors.	√ Yes ☐ No ☐ N/A
3	Train supervisors on the issues around data collection and the importance of good data to organizational performance.	√ Yes ☐ No ☐ N/A
4	Develop an information-sharing plan for supervisors so that the connection to data and operations is reinforced.	√ Yes ☐ No ☐ N/A
5	Continuous improvement loop.	√ Yes ☐ No ☐ N/A

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to demonstrate substantial compliance with Recommendation 68.1: As part of its technological capacity improvement strategy, the SFPD should develop a plan to advance its capacity to digest information it currently possesses in a consistent, easily accessible format such as a template containing key data points including officer performance indicators and crime indicators that could provide management with real-time information to inform their practice

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with this recommendation.</u>

SFPD has meaningfully complied with this recommendation and in doing so, has improved multiple efficiencies in its policing. As a threshold matter, SFPD's Technology Division has implemented an online Business Intelligence (BI) warehouse, which houses all electronic data in SFPD. SFPD has also moved from paper collection of some data to electronic collection of that same data. Together, these two improvements enable SFPD to now provide information to its members in a more efficient, and even real-time manner.

The Technology Division's Business Intelligence and Geospatial Technology Team (BI Team) has developed dashboards using data in the BI warehouse, including Use of Force incidents, Total Incidents, and Human Resource statistics, which is critical for SFPD to continually update their policing practices. The BI Team also holds regular meetings with leadership at multiple levels to discuss improvements to data collection and the dashboards. The BI Team also trains all SFPD members on the importance of data collection. Critically, SFPD went beyond the requirements of this recommendation to train recruits on data collection, reports, and dashboards. Finally, the BI Team issued a Unit Order requiring regular review of its processes to ensure that improvements are made on a regular bases.

Finally, the DOJ agrees with Jensen Hughes that SFPD's investment in this work bodes well for continued compliance with a number of recommendations.
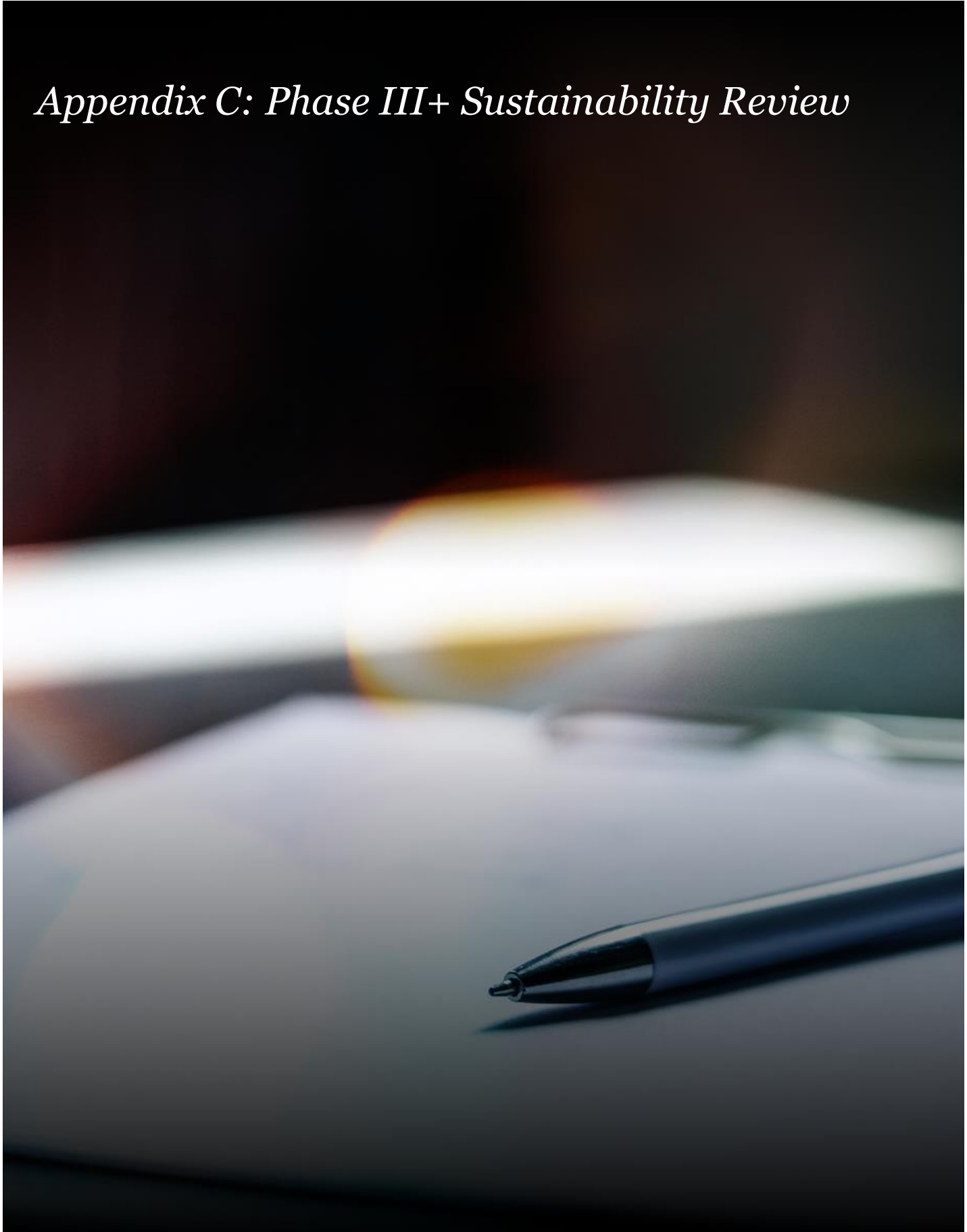If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

Appendix C: Phase III+ Sustainability Review

APPENDIX C: PHASE III+ SUSTAINABILITY REVIEW

SFPD Sustainability Review – Dip Sample of 30 Recommendations

Use of Force: 12 recommendations

1. Recommendation 3.1 – Substantial Compliance Granted in Phase 1 on February 15, 2019.
   The Police Commission, SFPD leadership, and elected officials should work quickly and proactively to ensure that the department is ready to issue these use of force policies and procedures to all department employees immediately following the collective bargaining meet-and-confer process. The process should not be drawn out, because the goal should be immediate implementation once it has been completed.

2. Recommendation 3.2 – Substantial Compliance Granted in Phase 3 on May 28, 2020.
   The SFPD should work with the Police Commission to obtain input from the stakeholder groups and conduct an after-action review of the meet-and-confer process to identify ways to improve input and expedite the process in the future for other policy development.

3. Recommendation 4.2 – Substantial Compliance Granted in Phase 3 on December 2, 2020.
   In developing an electronic reporting system, the SFPD must review current practice regarding reporting use of force, including reporting on level of resistance by the individual, level and escalation of control tactics used by the officer, and sequencing of the individual's resistance and control by the officer.

4. Recommendation 4.6 – Substantial Compliance Granted in Phase 2 on September 12, 2019.
   The SFPD should audit use of force data on a quarterly basis and hold supervisors accountable for ongoing deficiencies.

5. Recommendation 4.7 – Substantial Compliance Granted in Phase 3 on January 7, 2021.
   The SFPD should assign the Training and Education Division to synthesize the issues emerging from the use of force reports and create announcements for roll call on emerging trends. The announcements can include scenarios from incidents that were troubling or complicated in some way and encourage officers to discuss with one another in advance how they would communicate and approach such situations.

6. Recommendation 5.1 – Substantial Compliance Granted in Phase 1 on April 23, 2019.
   The SFPD needs to develop and train to a consistent reporting policy for use of force.

7. Recommendation 5.2 – Substantial Compliance Granted in Phase 3 on May 28, 2020.
   The SFPD needs to hold supervisors and officers accountable for failure to properly document use of force incidents.

8. Recommendation 6.3 – Substantial Compliance Granted in Phase 3 on May 21, 2020.
   SFPD training records should be fully automated and training data easily accessible.

9. Recommendation 8.1 – Substantial Compliance Granted in Phase 1 on April 23, 2019.
    The SFPD should immediately require supervisors to respond to events in which officers use force instruments or cause injury regardless of whether there is a complaint of injury by the individual. This will allow the department greater oversight of its use of force.

10. Recommendation 11.4 – Substantial Compliance Granted in Phase 3 on March 9, 2021.
    Officer-involved shooting events need to be reviewed in a more timely fashion as they relate to policy, training, and procedures. The FDRB should review incidents at the conclusion of the IAD investigation rather than waiting for the district attorney's letter of declination for charging of an officer-involved shooting incident, which can take up to two years.

11. Recommendation 12.2 – Substantial Compliance Granted in Phase 3 on May 28, 2020.
    The SFPD should ensure an appropriate distribution of CIT-trained personnel across all shifts in all districts.

12. Recommendation 18.1 – Substantial Compliance Granted in Phase 1 on April 23, 2019.
    The SFPD needs to develop a policy for investigation standards and response for all officer use of force.

Bias: 4 recommendations

13. Recommendation 24.3 – Substantial Compliance Granted in Phase 2 on September 3, 2019.
    The SFPD should immediately establish a policy and practice for ongoing audit of electronic communication devices to determine whether they are being used to communicate bias.

14. Recommendation 27.4 – Substantial Compliance Granted in Phase 3 on July 26, 2021.
    To ensure first-line supervisors understand the key role they play in addressing bias, supervisor training should include coaching, mentoring, and direct engagement with problem officers.

15. Recommendation 27.7 – Substantial Compliance Granted in Phase 3 on April 2, 2021.
    The SFPD should implement Force Options Training in a manner that reduces the impact of demographics on split-second use of force decisions and should ensure that in-service officers receive this training at least annually.

16. Recommendation 32.2 – Substantial Compliance Granted in Phase 3 on September 13, 2021.
    The SFPD needs better training on the Fourth Amendment and applicable state laws on search and seizure.

Community Oriented Policing: 4 recommendations

17. Recommendation 39.8 – Substantial Compliance Granted in Phase 3 on June 22, 2020.
    The SFPD must create a five-year technology initiative roadmap to facilitate migrating current platforms to the modern state architecture. This should be completed within 12 months of the issuance of this report.

18. Recommendation 40.5 – Substantial Compliance Granted in Phase 3 on February 21, 2020.
    The SFPD should develop specific measurable goals for community policing engagement within six months of the issuance of this report and ensure these measurements are incorporated into the department's CompStat processes.

19. Recommendation 42.1 – Substantial Compliance Granted in Phase 3 on July 21, 2021.
    The SFPD should continue to grant district captains the authority to serve the diverse populations represented in their districts within the tenets of community policing. However, the department needs to provide structure and support to these initiatives in accordance with the proposed strategic community policing plan.

20. Recommendation 43.3 – Substantial Compliance Granted in Phase 3 on December 2, 2020.
    The SFPD should consider reinvigorating its community police academy program to educate the community about the department's policing practices. The training should range from basic police orientation to ride-alongs with district police officers.

Accountability: 8 recommendations

21. Recommendation 56.2 – Substantial Compliance Granted in Phase 3 on October 23, 2020.
    The SFPD should allocate appropriate staff and resources to enhance community outreach initiatives and to incorporate customer service protocols for periodic follow-up and status communications with complainants for the duration of their open cases.

22. Recommendation 57.1 – Substantial Compliance Granted in Phase 3 on November 16, 2020.
    The SFPD needs to update its policies and educate personnel to appropriately recognize the importance of the first interaction between police personnel and members of the public who have complaints against the police.

23. Recommendation 61.1 – Substantial Compliance Granted in Phase 3 on December 17, 2020.
    The SFPD should develop a Standard Operating Procedures Manual detailing the scope of responsibility for all functions within the IAD. Standard operating procedures should provide guidance and advice on conflict reduction, whether internal or external to the SFPD.

24. Recommendation 63.2 – Substantial Compliance Granted in Phase 3 on January 29, 2020.
    The SFPD should continue to implement the tenets of procedural justice and ensure training include instruction on the importance of the IAD's functions to the integrity of the department and connection to the community.

25. Recommendation 65.1 – Substantial Compliance Granted in Phase 3 on May 19, 2021.
    The SFPD should develop a department-internal priority to regularly review and analyze OCC complaint reporting to identify priorities for intervention in terms of workforce culture, training, policy clarification, or leadership development.

26. Recommendation 70.1 – Substantial Compliance Granted in Phase 2 on October 22, 2019.
    The SFPD should work with the Police Commission to develop a nimble process for reviewing and approving existing and new Department General Orders that supports policing operations with codified, transparent policies.

27. Recommendation 70.4 – Substantial Compliance Granted in Phase 3 on April 5, 2021.
    Input and review from external stakeholders must be completed before implementation of the practice, policy, or procedure.

28. Recommendation 72.1 – Substantial Compliance Granted in Phase 2 on October 23, 2019.
    The SFPD should present all Department Bulletins that substantively change or countermand a Department General Order to the Police Commission before implementation and publish them on their website after approval is received.

Personnel: 2 recommendations

29. Recommendation 81.3 – Substantial Compliance Granted in Phase 3 on August 5, 2021.
    The SFPD should develop and implement applicant tracking and hiring data collection and reporting procedures to capture information such as:

    - *Recruitment sources for applicants who are hired and not hired;*
    - *Whether applicants are the result of personal referral, Internet, career center, print media, job fair, community or other outreach event, school career center, radio, television, outplacement service, or social media;*
    - *Passage rate by gender, race, and ethnicity for each major selection hurdle including written test, physical abilities, oral interview, polygraph, psychological assessment, hiring panel, and medical;*
    - *Selection rates by race, gender, and national origin;*
    - *Attrition rates by race, gender, national origin, and phase in training.*

30. Recommendation 84.1 – Substantial Compliance Granted in Phase 3 on December 3, 2020.
    The SFPD should reorganize its recruitment and hiring practices under one bureau to provide cohesion and ensure resources are strategically used toward recruiting and hiring goals.

Finding # 3	The SFPD and the Police Commission collaboratively worked with community stakeholders to update Department General Order 5.01 - Use of Force policy.
Recommendation # 3.1	The Police Commission, SFPD leadership, and elected officials should work quickly and proactively to ensure that the department is ready to issue these use of force policies and procedures to all department employees immediately following the collective bargaining meet-and-confer process. The process should not be drawn out, because the goal should be immediate implementation once it has been completed.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD reached substantial compliance with the recommendation in a prior reporting period. Since that time, the department has worked with its partners to improve its policy development processes in general and use of force policy in particular.

To expedite the process of obtaining input from employees and other stakeholders, the department hired a Director of Labor Relations who, in addition to other duties, was tasked with advising department leaders on the development and advancement of policy from inception through adoption by the Police Commission.

The department established a Joint Labor Relations Committee (LRC), comprised of the Labor Relations Director, department members, employee group representatives and external partners, who meet monthly to discuss department general orders that may require modification or revision and consider issues that may require the department to promulgate new policies. The joint effort of the department and its partners was key to the publication and implementation of Department General Order (DGO) 5.01 Use of Force and Proper Control of Persons (revised November 2022).

The documents produced in support of this and similar recommendations demonstrate the SFPD has sustained its commitment to seeking and incorporating stakeholder input in the development and implementation of policies and practices that impact the community.

Compliance Measures		Status/Measure Met
1	Work quickly and proactively on issuance of use of force policies and procedures.	√ Yes ☐ No ☐ N/A
2	Issue use of force policies and procedures to all department employees immediately after meet-and-confer process.	√ Yes ☐ No ☐ N/A
3	Immediate implementation of use of force policies and procedures following issuance.	√ Yes ☐ No ☐ N/A

Finding # 3	The SFPD and the Police Commission collaboratively worked with community stakeholders to update Department General Order 5.01 - Use of Force policy.
Recommendation # 3.2	The SFPD should work with the Police Commission to obtain input from the stakeholder groups and conduct an after-action review of the meet-and-confer process to identify ways to improve input and expedite the process in the future for other policy.

Recommendation Status	**Complete** **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD has continued to work with the Police Commission and stakeholders to ensure their input in the process of developing or modifying department policy. To expedite the process of obtaining input from employees and other stakeholders, the department hired a Director of Labor Relations who, in addition to other duties, was tasked with advising department leaders on the development and advancement of policy from inception through adoption by the Police Commission.

The department established a Joint Labor Relations Committee (LRC), comprised of the Labor Relations Director, other department members and employee group representatives, who meet monthly to discuss DGOs that may require modification or revision and consider issues that may require the department to promulgate new policies. This collaborative stakeholder effort contributed to the development and implementation of key policies, including the revised DGO 5.01 Use of Force and Proper Control of Persons (revised November 2022).

The documents produced in support of this recommendation demonstrate the SFPD has sustained its commitment to seeking and incorporating stakeholder input in the development and implementation of policies and practices that impact the community.

Compliance Measures		Status/Measure Met
1	Work with the Police Commission.	√ Yes ☐ No ☐ N/A
2	Obtain input from all relevant stakeholder groups.	√ Yes ☐ No ☐ N/A
3	Conduct an after-action review of the meet-and-confer process.	√ Yes ☐ No ☐ N/A
4	Identify ways to improve input and expedite the process in the future for other policy development and implementation.	√ Yes ☐ No ☐ N/A

Finding # 4	The Use of Force Log captures insufficient information about use of force incidents.
Recommendation # 4.2	In developing an electronic reporting system, the SFPD must review current practice regarding reporting use of force, including reporting on level of resistance by the individual, level and escalation of control tactics used by the officer, and sequencing of the individual's resistance and control by the officer.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD revised DGO 5.01 Use of Force and Proper Control of Persons to ensure the policy meets or exceeds California law and contemporary practices. The policy aligns with key concepts regarding the use of force, including reporting by the subject's level of resistance and the officer's response level of resistance; and reporting on the escalation of control tactics used by the officer. The use of force reporting system has transitioned to a digital format linked to the department's Crime Data Warehouse, and auditing protocols established in prior renditions have been strengthened.

The department has continued to adhere to policies and practices that demonstrate its commitment to the requirements of this recommendation.

Compliance Measures		Status/Measure Met
1	Review and align current practice regarding reporting use of force in light of contemporary policing best practices.	√ Yes ☐ No ☐ N/A
2	Review and align current practice on reporting level of resistance by the individual in light of contemporary policing best practices.	√ Yes ☐ No ☐ N/A
3	Review and align current practice on reporting escalation of control tactics used by the officer, including level of force, in light of contemporary policing best practices.	√ Yes ☐ No ☐ N/A
4	Review and align current practice on reporting level of force used in response to resistance, in light of contemporary policing best practices.	√ Yes ☐ No ☐ N/A
5	Review and align current practice of reporting the sequencing of the individual's resistance and control by the officer in light of contemporary policing best practices.	√ Yes ☐ No ☐ N/A
6	Use the review to develop an appropriate use of force reporting system concurrent with Recommendation # 4.1 that is informed by contemporary policing best practices.	√ Yes ☐ No ☐ N/A

Finding # 4	The Use of Force Log captures insufficient information about use of force incidents.
Recommendation # 4.6	The SFPD should audit use of force data on a quarterly basis and hold supervisors accountable for ongoing deficiencies.

Recommendation Status	**Complete** **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD established policy and protocols for auditing use of force and supervisor use of force reports. The department revised Unit Order 21-01 Supervisory Use of Force Form Audit Procedures to align with the requirement of the updated Use of Force and Proper Control of Persons Policy, DGO 5.01.

DGO 5.01 establishes policy regarding the collection and analysis of use of force data; Unit Order 21.01 tasks responsibility for auditing supervisor use of force reports. Division Commanders are tasked with the responsibility of determining corrective and remedial measures holding supervisors accountable for deficiencies with data accuracy and reporting.

The department has continued to adhere to policies and practices that demonstrate its commitment to the requirements of this recommendation.

Compliance Measures		Status/Measure Met
1	Audit use of force data on a quarterly basis.	√ Yes ☐ No ☐ N/A
2	Hold supervisors accountable for ongoing deficiencies with data accuracy and reporting of data.	√ Yes ☐ No ☐ N/A
3	Evidence of remedial action if deficiencies are found.	√ Yes ☐ No ☐ N/A

Finding # 4	The Use of Force Log captures insufficient information about use of force incidents.
Recommendation # 4.7	The SFPD should assign the Training and Education Division to synthesize the issues emerging from the use of force reports and create announcements for roll call on emerging trends. The announcements can include scenarios from incidents that were troubling or complicated in some way and encourage officers to discuss with one another in advance how they would communicate and approach such situations.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD achieved substantial compliance for its work in reviewing use of force reports to inform the department's use of force policy and training. Since achieving substantial compliance, the department has relied on feedback from the Field Tactics Force Option (FTFO) Unit, collaboration with the Department of Police Accountability (DPA) and department notices, including emails, to inform discussions and training on the use of force. Collaboration with the DPA is formalized through the analysis and review of complaint data, particularly complaints related to the use of force. The FTFO analyzes officer-involved force incidents and forwards the results of the analysis to the Risk Management Office (RMO) and the Training Division. The units collaborate to develop training that addresses the issue in a way that informs improvements in use of force policy and training. The remedial or corrective action can be delivered in multiple formats, including in-person, roll call, and interpersonal communication between department members and their supervisors.

While the department has remained committed to the requirements of this recommendation, the department must reinvigorate its review of the use of force quarterly reports as a way of learning information that could inform policy and training. The department's current review and reporting of use of force data to the Police Commission can also be used to inform discussion, education and training on the use of force.

	Compliance Measures	Status/Measure Met
1	SFPD Training and Education Division report and analysis (synthesis) of the issues emerging from the quarterly use of force reports.	☐ Yes ☐ No √ N/A
2	Evidence of roll call/line-up announcements on emerging use of force trends resulting from analysis.	√ Yes ☐ No ☐ N/A
3	Evidence that the announcements are educational and scenario-based in a way that encourages officers to engage in discussion regarding the use of force.	√ Yes ☐ No ☐ N/A
4	Continual review/improvement loop to advance knowledge and information.	√ Yes ☐ No ☐ N/A

Finding # 5	The SFPD does not consistently document the types of force used by officers.
Recommendation # 5.1	The SFPD needs to develop and train to a consistent reporting policy for use of force.

Recommendation Status	<mark>Complete</mark> Partially Complete In Progress Not Started No Assessment

Summary

The SFPD has maintained its commitment to policy and training on use of force reporting. Pursuant to DGO 5.01 Use of Force and Proper Control of Persons (revised November 2022), all uses of force, except the minimal force necessary to give direction or support, remain reportable. The revised policy also includes guidance regarding documentation and notification requirements for the drawing or exhibition of firearms, including the supervisor's review or evaluation of these events (Department Notice 22-026 Updated Data Collection for Use of Force and Firearm Drawn/Exhibited, April 2022). Supervisors received updated training on their reporting requirements, including the revised Supervisory Use of Force Evaluation Report, which is now electronically automated and stored in the department's Crime Data Warehouse.

The department continues to require an audit or review of a supervisor's use of force reports, and the audit reports are forwarded to the supervisor's Division Commander/Captain, who remains responsible for issuing corrective measures to remediate errors in the supervisor's reporting and evaluation of the use of force.

The SFPD has demonstrated the reporting and evaluation of the use of force is a practice that is institutionalized within the organization.

Compliance Measures		Status/Measure Met
1	Develop a policy that provides consistent use of force reporting.	√ Yes ☐ No ☐ N/A
2	Ensure training is consistent with the use of force reporting policy.	√ Yes ☐ No ☐ N/A
3	Audit to ensure consistent reporting of use of force incidents.	√ Yes ☐ No ☐ N/A
4	Evidence of remedial measures (training, discipline, etc.) if deficiencies are found.	√ Yes ☐ No ☐ N/A

Finding # 5	The SFPD does not consistently document the types of force used by officers.
Recommendation # 5.2	The SFPD needs to hold supervisors and officers accountable for failure to properly document use of force incidents.

Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

This recommendation was first awarded substantial compliance in June 2020. The SFPD published DGO 5.01 Use of Force and Proper Control of Persons. The policy establishes that officers will document their use of force in an incident report and promptly notify a supervisor. Supervisors are required to complete a review of the officer's use of force and complete the Supervisor's Use of Force Evaluation Report.

Unit Order 20-01 Supervisor Use of Force Evaluation Audit Procedure describes the protocols for regularly reviewing supervisor reports and tasks Division Commanders with the responsibility of issuing remedial or corrective action to supervisors for errors in data accuracy or reporting.

The department has continued to adhere to policies and practices that demonstrate the commitment to sustaining practices and policy necessary to institutionalize use of force reporting and review and has provided data in support of this determination. The sustainability of this recommendation and the work that contributed to it then and continuing through this review period has been consistent with ongoing compliance.

Compliance Measures		Status/Measure Met
1	Process established for ensuring supervisors and officers properly document use of force incidents.	√ Yes ☐ No ☐ N/A
2	Accountability for not properly documenting use of force incidents.	√ Yes ☐ No ☐ N/A
3	Evidence of remedial action if deficiencies are found.	√ Yes ☐ No ☐ N/A

Finding # 6	The SFPD has not developed comprehensive formal training specifically related to use of force practices.
Recommendation # 6.3	SFPD training records should be fully automated and training data easily accessible.

Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

The SFPD continues to use the Human Resource Management System (HRMS) to archive training records in a digital format, which makes the records accessible easily by Training Division and department members. Any department member can view their training records by accessing the HRMS and selecting the SFPD Self-Service sub-portal.

The department submitted audit records and training rosters for two recent classes related to the use of force – Crowd Control and Critical Mindset. The records demonstrate the department continues to ensure the accuracy of its training records as required by Department Bulletin 20-03 Monthly Roll-Call Training & Periodic Audit of HRMS Training Records for Accuracy.

The department continues to adhere to policies and practices necessary to sustain its commitment to formal training on the use of force, including methods for assessing and evaluating the efficacy of its use of force training.

Compliance Measures		Status/Measure Met
1	Ensure that training records are fully automated.	√ Yes ☐ No ☐ N/A
2	Ensure that training data are easily accessible.	√ Yes ☐ No ☐ N/A
3	Conduct periodic audits of training system for accuracy of records.	√ Yes ☐ No ☐ N/A

Finding # 8	SFPD supervisors are not required to respond to the scene of all use of force incidents and are not required to fully document their actions.
Recommendation # 8.1	The SFPD should immediately require supervisors to respond to events in which officers use force instruments or cause injury regardless of whether there is a complaint of injury by the individual. This will allow the department greater oversight of its use of force.

Recommendation Status	Complete Partially Complete In Progress
	Not Started No Assessment

Summary

The SFPD received substantial compliance for this recommendation in April 2019. Since achieving substantial compliance, the department has maintained protocols for supervisory review of an officer's use of force. Since our last review, the department has revised the use of force policy, incorporating new guidance for supervisors, including the requirement to respond to the scene in which the officer displays their firearm, DGO 5.01 Use of Force and Proper Control of Persons, (revised November 2022).

Section 5.01.09 B2 Supervisor Responsibility requires a supervisor to respond to the scene immediately when notified of the use of force, except when an immediate response is impractical or poses a danger or when an officer's continued presence creates risk. Once there, the supervisor is tasked with investigating the use of force by, among other tasks:

- Ensuring the scene is secure and checking the consumer and officer for injuries;
- Identifying and canvassing for witnesses;
- Interviewing the officer, consumer and witnesses;
- Reviewing body-worn camera (BWC) and other evidence;
- Completing the Use of Force Log; and
- Completing the Supervisor Use of Force Evaluation.

Supervisor use of force evaluations are reviewed pursuant to a random process and to Unit Order 21-01 Supervisory Use of Force Form Audit Procedures. The Early Intervention System (EIS) Unit continues to conduct quarterly audits of supervisor use of force evaluations and report to the Police Commission on use of force trends and analysis.

The scope of the audit appears to be limited to remediating inaccuracies in the completion of the form as opposed to assessing the adequacy of the supervisor's opinion or determinations regarding the use of force.

Moving forward, the SFPD should consider building on the success of the Field Options Force Tactics Unit to ensure supervisors develop the skills that would support their ability to make an assessment of whether an officer's use of force was consistent or inconsistent with the department's use of force policy.

Compliance Measures	Status/Measure Met
1 Immediately require supervisors to respond to events involving officers using instruments of force.	√ Yes　☐ No　☐ N/A
2 Immediately require supervisors to respond to incidents involving injury.	√ Yes　☐ No　☐ N/A
3 Evidence of continual audit/improvement loop.	√ Yes　☐ No　☐ N/A
4 Evidence of supportive and remedial actions if deficiencies are found.	√ Yes　☐ No　☐ N/A

Finding # 11	The Firearm Discharge Review Board is limited in scope and fails to identify policy, training, or other tactical considerations.
Recommendation # 11.4	Officer-involved shooting events need to be reviewed in a more timely fashion as they relate to policy, training, and procedures. The FDRB should review incidents at the conclusion of the IAD investigation rather than waiting for the district attorney's letter of declination for charging of an officer-involved shooting incident, which can take up to two years.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD reached substantial compliance status with this recommendation by promulgating and implementing policy that requires the Firearms Discharge Review Board (FDRB) to review investigations of officer-involved shooting and officer-involved discharged (OIS/OID) incidents without waiting on a charging decision from the district attorney's office. The department modified its policy and practices to require the FDRB to meet upon the conclusion of the administrative investigation to make a recommendation as to whether the discharges were "In Policy" or "Not in Policy." The FDRB is comprised of department members and a representative of the Police Commission and the Department of Police Accountability.

The SFPD continues to see reduced OIS/OID incidents as a result of improved policy, supervision and training. As a result, the FDRB generally meets only when an OIS/OID event occurs. Department records reflect the FDRB met at least three times to review OIS/OID incidents that occurred during this review period: April 28, 2022, November 18, 2022, and June 14, 2023. As a result of these and other discussions, the department recognized the review of OIS/OID incidents was enhanced by the presence of a representative of the Training Division and of the Field Tactics Force Option (FTFO) Unit. The department has since modified the composition of the FDRB to add these subject matter experts as members of the FDRB in an advisory capacity.

Our assessment of the response to this recommendation confirms the SFPD's sustained commitment to the review of OIS/OID incidents to identify policy, training and tactical considerations on a regular basis.

Compliance Measures		Status/Measure Met
1	FDRB schedule review of OIS at conclusion of IA investigation.	√ Yes ☐ No ☐ N/A
2	FDRB schedule review is held via regular occurrences.	√ Yes ☐ No ☐ N/A

Finding # 12	The SFPD has significantly expanded its Crisis Intervention Team (CIT) training program; however, the SFPD does not have a strong operations protocol for CIT response.
Recommendation # 12.2	The SFPD should ensure an appropriate distribution of CIT-trained personnel across all shifts in all districts.

Recommendation Status	**Complete** Partially Complete In Progress Not Started No Assessment

Summary

The department reached substantial compliance with this recommendation in an earlier reporting period. Since then, the department has continued to ensure patrol shifts have appropriate personnel who have received Crisis Intervention Team (CIT) training.

The department has maintained its commitment to CIT training for all persons who respond to calls for service. As of December 2023, 70% of the personnel assigned to district stations have received CIT training. To ensure the personnel are assigned to the districts and shifts where needed, the CIT Unit continues to review CIT or mental health-related calls on a quarterly basis and provide the information to District Commanders and Captains to inform allocation decisions. District Commanders and Captains use this information to make short-term and long-term allocation decisions to the extent permitted by labor agreements or law, as applicable.

The department has sustained training and practices to ensure the appropriate response to and resolution of CIT-related calls for assistance.

Compliance Measures		Status/Measure Met
1	Assess staffing need for CIT by shift.	√ Yes ☐ No ☐ N/A
2	Assign appropriate number of CIT personnel to all shifts.	√ Yes ☐ No ☐ N/A
3	Periodic review/audit of staffing levels and adjust as appropriate.	√ Yes ☐ No ☐ N/A

Finding # 18	The SFPD does not adequately investigate officer use of force.
Recommendation # 18.1	The SFPD needs to develop a policy for investigation standards and response for all officer use of force.

Recommendation Status	Complete Partially Complete In Progress
	Not Started No Assessment

Summary

The SFPD published DGO 5.01 Use of Force, which describes the responsibilities of supervisors for responding to and reporting on an officer's use of force. Since our last review, the department has revised the use of force policy, incorporating new guidance for supervisors, DGO 5.01 Use of Force and Proper Control of Persons, (revised November 2022).

Section 5.01.09 B2 Supervisor Responsibility requires a supervisor to respond to the scene immediately when notified of the use of force, except when an immediate response is impractical or poses a danger or when an officer's continued presence creates risk. Once there, the supervisor is tasked with investigating the use of force by, among other tasks:

- Ensuring the scene is secure and checking the consumer and officer for injuries;
- Identifying and canvassing for witnesses;
- Interviewing the officer, consumer and witnesses;
- Reviewing body-worn camera (BWC) and other evidence;
- Completing the Use of Force Log; and
- Completing the Supervisor Use of Force Evaluation.

The Supervisor Use of Force Evaluation has been modified to ensure it is consistent with the use of force policy. The revised form also incorporates a supervisor's responsibility for reporting on an officer's display of a firearm as required by Department Notice 22-026 Updated Data Collection for Use of Force and Firearm Drawn/Exhibited, published April 12, 2022. DGO 5.01.09 C establishes protocols for the collection and analysis of use of force data. Unit Order 21-01 Supervisory Use of Force Form Audit Procedures tasks responsibility for conducting quarterly audits of supervisor use of force evaluations. The department continues to rely on the Early Intervention System (EIS) Unit, in coordination with the Risk Management Office, to audit or review a supervisor's use of force evaluation and report to the Police Commission on use of force trends and analysis.

Our review finds the department has sustained its policies and practices governing the use of force. For next steps, our team looks forward to the department enhancing its focus on the efficacy and quality of the supervisor's determination as to whether an officer's use of force was "In Policy" or "Not in Policy," similar to the analysis conducted by the Field Tactics Force Option (FTFO) Unit, and other analysis by the Department of Police Accountability.

Compliance Measures		Status/Measure Met
1	Develop investigative standards.	√ Yes ☐ No ☐ N/A
2	Develop response standards.	√ Yes ☐ No ☐ N/A
3	Develop policy.	√ Yes ☐ No ☐ N/A
4	Provide training.	√ Yes ☐ No ☐ N/A
5	Audit of training records and training/continual improvement/feedback loop.	√ Yes ☐ No ☐ N/A
6	Evidence of supportive and remedial action if deficiencies are found.	√ Yes ☐ No ☐ N/A

Finding # 24	The SFPD did not conduct a comprehensive audit of official electronic communications, including department-issued e-mails, communications on mobile data terminals, and text messages on department-issued phones following the texting incidents.
Recommendation # 24.3	The SFPD should immediately establish a policy and practice for ongoing audit of electronic communication devices to determine whether they are being used to communicate bias.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD achieved substantial compliance with this recommendation in 2019. Since that time, the department has continued to adhere to protocols established to audit electronic communications for bias.

The Technology Division and the Internal Affairs Division continue to share responsibility for monitoring electronic communications and devices for evidence of bias or word usage that is potentially biased. When a potentially biased word is identified, the Internal Affairs Division conducts a review of the communication to confirm whether the communication is in fact biased or contains words that are derogatory toward any person or group. If the review confirms biased communication, the Internal Affairs Division will open a misconduct investigation.

The department has maintained the practice of publishing a report to the Mayor and Police Commission of their quarterly audits of electronic communication devices. Additionally, all department mobile devices are enrolled in the AT&T Message Archive System (SMARSH), an auditing platform in which both the Technology Division and the vendor monitor mobile devices for biased-related communication.

The response to this recommendation demonstrates the SFPD has sustained the practice of ongoing audits of electronic communication devices for biased or bias-related communications.

Compliance Measures		Status/Measure Met
1	Immediate establishment of policy for audits of electronic communication devices.	√ Yes ☐ No ☐ N/A
2	Established practice for ongoing audits of electronic communication devices including audit plan and process.	√ Yes ☐ No ☐ N/A
3	Evidence of audit of potential bias.	√ Yes ☐ No ☐ N/A
4	Evidence of supportive and remedial action if deficiencies are found.	√ Yes ☐ No ☐ N/A

Finding # 27	The SFPD is not addressing the anti-bias goals set forth through the Fair and Impartial Policing training-the-trainers session.
Recommendation # 27.4	To ensure first-line supervisors understand the key role they play in addressing bias, supervisor training should include coaching, mentoring, and direct engagement with problem officers.

Recommendation Status	Complete Partially Complete In Progress
	Not Started No Assessment

Summary

The SFPD committed to delivering ongoing training to first-line supervisors regarding their role in addressing biased behavior. The education and training included guidance on how to recognize signs and trends in misconduct, and the laws and procedures governing investigations of misconduct allegations. The department expects first-line supervisors to be proactive in supervising and intervening with officers based on the supervisor's review and observations of stop data. To assist supervisors in meeting this expectation, the department provided training on recognizing disparities in stop data and other enforcement decisions.

Newly promoted sergeants are required to attend training that includes education and training on their new role and responsibilities, including coaching, guiding and supervision of personnel.

To ensure these anti-bias practices remain institutionalized, the department tasked the Training Division's Professional Development Unit to conduct an audit and review of Bias Training Programs. While the department has produced some evidence to support the utility of the audits in improving supervisory practices, the department must remain committed to informing and improving its anti-bias practices through effective supervisory leadership and oversight of key functions and personnel.

Compliance Measures		Status/Measure Met
1	Conduct training for first-line supervisors.	√ Yes ☐ No ☐ N/A
2	Focus on ensuring they understand their role in addressing bias.	√ Yes ☐ No ☐ N/A
3	Training covers: - Coaching - Mentoring - Direct engagement with problem officers	√ Yes ☐ No ☐ N/A
4	Evidence of review loop.	√ Yes ☐ No ☐ N/A

Finding # 27	The SFPD is not addressing the anti-bias goals set forth through the Fair and Impartial Policing training-the-trainers session.
Recommendation # 27.7	The SFPD should implement Force Options Training in a manner that reduces the impact of demographics on split-second use of force decisions and should ensure that in-service officers receive this training at least annually.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD reached substantial compliance status with this recommendation in July 2021. Since then, the department has refined the role of the Field Tactics Force Option (FTFO) Unit to include not only responsibility for training officers on the use of force but also auditing and reviewing use of force incidents to inform training and policy development. The department published a revised FTFO resource guide that describes the force review and training responsibilities of the unit (September 2021).

The FTFO unit is responsible for reviewing officer-involved shooting and officer-involved discharged incidents (OIS/OID) and making a recommendation as to whether the use of force was "In Policy" or "Not in Policy." A member involved in an OIS or serious incident is required to attend "refresher" training developed by the FTFO. The training curriculum includes mandated topics:

- Use of Force Policy/Use of Deadly Force

- Command and Control

- Tactical Communication

- Tactical Planning

- De-escalation Techniques

- Firearms and Other Equipment

- Sanctity of Life

The department continues to provide anti-bias training on an annual basis. Within the last year, all officers have received bias-related training at the training division, including Advanced Officer Training or roll call training. While training may not be directly related to the use of force or deadly force, the anti-bias training does contribute to a culture that values the rights of all persons, which results in improved communication between officers and the public in ordinary and tense circumstances. When officers and consumers communicate in a respectful manner, the likelihood of split-second decisions on whether to use force or deadly force is reduced.

As a result of the protocols established to conduct comprehensive reviews of OIS/OID and critical incidents and anti-bias policies and training, the SFPD continues to maintain practices that reduce the impact of bias on use of force decisions.

Compliance Measures		Status/Measure Met
1	Develop training curriculum designed to reduce the impact of demographics on split-second use of force decisions.	√ Yes ☐ No ☐ N/A
2	Implement force options training.	√ Yes ☐ No ☐ N/A
3	Provide annual training to all officers.	√ Yes ☐ No ☐ N/A
4	Evidence of training review.	√ Yes ☐ No ☐ N/A
5	Ongoing assessment of impact on the relationship between use of force and demographics.	√ Yes ☐ No ☐ N/A
6	Evidence of supportive and remedial action if deficiencies are found, including failure to attend training.	√ Yes ☐ No ☐ N/A

Finding # 32	Not only are African-American and Hispanic drivers disproportionately searched following traffic stops but they are also less likely to be found with contraband than White drivers.
Recommendation # 32.2	The SFPD needs better training on the Fourth Amendment and applicable state laws on search and seizure.

Recommendation Status	**Complete** Partially Complete In Progress Not Started No Assessment

Summary

The SFPD established a Constitutional Policing Unit and tasked the Director of Constitutional Policing with coordinating a strategic approach to training on the Fourth Amendment and laws on search and seizure. The department developed training to support the revised policy on search warrants, Department General Order 5.16 Search Warrants, which included direct engagement between the Director and training class attendees. A three-day course on search and seizure considerations for misdemeanor drug cases, including practical guidance regarding the constitutional limits of "Pat" searches, was also offered to department members.

The department used multiple platforms to deliver Fourth Amendment training, including roll call training in person and video; periodic emails from the Training Division on new developments derived from court decisions; and other messaging discussing emerging Fourth Amendment-related issues occurring in the department and the profession.

The collaboration between the constitutional policing unit and the Training Division supports the department's sustained focus on ensuring its officers engage with all persons in a manner that is consistent with the Fourth Amendment and fair and impartial policing principles.

Compliance Measures		Status/Measure Met
1	Improve curriculum for Fourth Amendment training.	√ Yes ☐ No ☐ N/A
2	Evidence of revised/improved training on state search and seizure laws.	√ Yes ☐ No ☐ N/A
3	Continuous improvement loop regarding efficacy of training.	√ Yes ☐ No ☐ N/A

Finding # 39	The SFPD does not have a department-wide strategic plan that articulates a mission and identifies the goals and objectives necessary to deliver overall policing services.
Recommendation # 39.8	The SFPD must create a five-year technology initiative roadmap to facilitate migrating current platforms to the modern state architecture. This should be completed within 12 months of the issuance of this report.

Recommendation Status	==Complete== Partially Complete In Progress
	Not Started No Assessment

Summary

This recommendation was originally awarded substantial compliance in May 2020. The SFPD established a technology governance process to facilitate the review of the department's technology architecture. IT governance includes the development of a five-year technology plan by the Information Technology Steering Committee, which was established pursuant to Unit Order 23-01.

The roadmap identifies the plan to migrate current IT architecture and platforms to align with modern platforms for key functions, including records management, business intelligence, and crime data collection and analysis. The governance process ensures IT needs are assessed annually and updated to align with the department's needs.

The department has continued to adhere to policies and practices that demonstrate the commitment to sustaining practices and policy necessary to institutionalize use of force reporting and review.

Although this work did not occur within 12 months of the report, the department and City have invested in the IT systems and have moved the work forward.

The sustainability of this recommendation and the work that contributed to IT then and continuing through this review period have been consistent with ongoing compliance.

Compliance Measures		Status/Measure Met
1	Create a five-year technology initiative roadmap.	√ Yes ☐ No ☐ N/A
2	Evidence roadmap addresses the migration of technology platforms to modern architecture.	√ Yes ☐ No ☐ N/A
3	Technology roadmap completed by October 12, 2017.	√ Yes ☐ No ☐ N/A
4	Ongoing review loop to ensure the progression of the roadmap and that it accounts for IT advances that address trends and other issues.	√ Yes ☐ No ☐ N/A

Finding # 40	The SFPD does not formalize community engagement in support of community policing practices.
Recommendation # 40.5	The SFPD should develop specific measurable goals for community policing engagement within six months of the issuance of this report and ensure these measurements are incorporated into the department's CompStat processes.

Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

This recommendation was originally determined to be substantially compliant in January 2020.

The SFPD established measurable goals for community engagement in February 2020. Since that time, the department has maintained its commitment to community engagement by revising DGO 1.08 Community Policing and developing a Community Policing Problem Solving Manual.

Discussion of contemporary policing issues was revised and expanded based on input from community and department members. Input from department members is obtained through audits and from regular discussions at Community Crime Strategy meetings.

The department has continued to adhere to policies and practices that demonstrate the commitment to community engagement has become institutionalized.

The sustainability of this recommendation and the work that contributed to it then and continuing through this review period have been consistent with ongoing compliance.

	Compliance Measures	Status/Measure Met
1	Development with input from the community of measurable goals for community policing engagement.	√ Yes ☐ No ☐ N/A
2	Evidence that the measurable goals are incorporated into the department's CompStat processes.	√ Yes ☐ No ☐ N/A
3	Development completed by April 12, 2017.	☐ Yes ☐ No √ N/A
4	Review or audit to assess effectiveness.	√ Yes ☐ No ☐ N/A

Finding # 42	The SFPD conducts community policing in silos but does not ensure community policing is systematically occurring across the department.
Recommendation # 42.1	The SFPD should continue to grant district captains the authority to serve the diverse populations represented in their districts within the tenets of community policing. However, the department needs to provide structure and support to these initiatives in accordance with the proposed strategic community policing plan.

Recommendation Status	<mark>Complete</mark> **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD developed DGO 1.08 Community Policing to provide structure and guidance to district captains, who are required to develop a community policing strategic plan. Guidance includes developing a template to ensure meetings are meaningful and cover key topic areas, peer-to-peer training to ensure skill development, and guidance on how to develop community policing strategic plans that reflect the unique goals and opportunities associated with their districts.

The department conducts periodic audits of community policing initiatives to ensure they align with the department's overall community policing strategic plan; and the department is developing a Community Policing Problem Solving Manual that will provide additional guidance for structuring community policing initiatives.

The department has continued to adhere to policies and practices that demonstrate the commitment to sustaining practices and policy necessary to institutionalize its community policing practices.

Compliance Measures		Status/Measure Met
1	Evidence that district captains are provided structure and support to guide their community policing initiatives.	√ Yes ☐ No ☐ N/A
2	Evidence that the community policing initiatives are consistent with the strategic community plan required by these recommendations.	√ Yes ☐ No ☐ N/A
3	Evidence of departmental support to captains on community policing.	√ Yes ☐ No ☐ N/A
4	Review or audit to ensure district goals are consistent with the strategic plan.	√ Yes ☐ No ☐ N/A

Finding # 43	The SFPD engages in a range of successful activities, programs, and community partnerships that support community policing tenets, particularly those coordinated through the Youth and Community Engagement Unit.
Recommendation # 43.3	The SFPD should consider reinvigorating its community police academy program to educate the community about the department's policing practices. The training should range from basic police orientation to ride-alongs with district police officers.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD achieved substantial compliance status for this recommendation in December 2020. Since then, the department has continued to use the community police academy to educate the community about the department's policing practices.

The department completed its most current community police academy on April 20, 2023, with a curriculum that provides education on a range of topics, including the use of force and use of deadly force, anti-bias, emergency management and response, and the department's crisis intervention protocols. Academy members also receive hands-on training on the department's force options and driving simulators. Information regarding the academy is posted on the department's webpage, and the community police academy is discussed regularly at district community meetings.

Evaluations completed by attendees at the end of the academy and a roundtable discussion with the Chief of Police inform the Community Engagement Division's (CED's) ongoing review of the program. CED discussions with area youth inform the SF Police Activities League (SFPAL) summer Youth Academy, recently held on May 31, 2023. The SFPD continues to demonstrate community engagement with adult and youth constituencies is an institutionalized practice within the department.

Compliance Measures		Status/Measure Met
1	Evidence of consideration of reinvigorating community police academy program.	√ Yes ☐ No ☐ N/A
2	If decided to act, curriculum that provides education regarding SFPD's policing practices. If decided not to act, provide an explanation and evidence for how the current program is adequate.	√ Yes ☐ No ☒ N/A
3	Evidence of a range of training topics and outreach to engage community participation.	√ Yes ☐ No ☐ N/A
4	Ongoing review and continuous improvement loop for training topics and participation.	√ Yes ☐ No ☐ N/A

Finding # 56	The SFPD does not engage in community outreach and information regarding the discipline process and rights of the community.
Recommendation # 56.2	The SFPD should allocate appropriate staff and resources to enhance community outreach initiatives and to incorporate customer service protocols for periodic follow-up and status communications with complainants for the duration of their open cases.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance in Phase 3 for 56.2 on October 23, 2020. The initial staffing requirements were not reviewed under this sample, and work remains ongoing to ensure the public has access and can engage effectively on complaints. The website, work through the DPA and the district meetings ensure the information is present and available, so there is adherence to the goals for compliance measures # 1 and 2. Specific staff members are tasked with ensuring receipt, tracking progress and delivery of progress letters to complainants. (Compliance measure # 1 ongoing). The senior clerk is tasked with the delivery of the receipt letter and the disposition of the complaint letter. Quarterly audits confirm the work is ongoing with the letters (Compliance measures # 2 and # 3 ongoing).

The audits are intended to ensure the actions are occurring (Compliance measure # 4 ongoing). As part of this review, the department identified that audits for the investigators were not being measured consistent with the focus given the initial contact letters. The department has submitted an updated unit order affixing specific responsibility for the monthly contact and review logs to be reported on by the clerk and responsibility to the unit sergeant for ensuring follow through. The order also reiterates the requirement to ensure all contact is reported on the activity log. This is evidence of compliance measure # 5 as well.

The department has provided evidence that the training on effective communication is ongoing and has instituted a DPA training course for all newly promoted supervisors, evidence supportive of adherence to compliance measure # 4. Also, IA has implemented an internal tracking log in which investigators must account for outreach to the complainant in a timely manner. It is recommended that SFPD continue to focus on and prioritize timely complainant engagement in an effort to demonstrate its commitment to ethical policing in San Francisco. The Standard Operating Procedures (SOP) Manual addresses community contacts, with a requirement of contact within five days. Consideration should be given to ensuring contact as soon as possible – and ongoing given the duration of the complaint system – when SFPD updates its SOP Manual in the future (See Recommendation 61.1).

Maintaining a community-forward focus as a responsibility of investigators will help ensure ongoing improvement and fidelity to the goals of this recommendation. Additionally, the department identifies that a review of the outcomes of the program was established under SFPD Field Operations Bureau Unit Order 19-01, which required district station captains to hold public meetings twice a year on how to make a complaint and how to commend an officer are audited annually to facilitate ongoing improvement in this engagement, consistent with compliance measure # 4.

The SFPD has demonstrated continued compliance with this recommendation.

Compliance Measures		Status/Measure Met
1	Assessment of staffing needs to support community outreach, customer service protocols and communications with complainants.	√ Yes ☐ No ☐ N/A
2	Establish a customer service protocol for complaints that includes status updates to complainants.	√ Yes ☐ No ☐ N/A
3	Evidence that communications with complainants are occurring.	√ Yes ☐ No ☐ N/A
4	Evidence of ongoing review improvement loop.	√ Yes ☐ No ☐ N/A

Finding # 57	The SFPD does not provide leadership in its role with respect to complaints against SFPD personnel.
Recommendation # 57.1	The SFPD needs to update its policies and educate personnel to appropriately recognize the importance of the first interaction between police personnel and members of the public who have complaints against the police.

Recommendation Status	**Complete** Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance in Phase 3 for 57.1 on November 16, 2020. The department relies upon the goal of the DGO in ensuring members of the public are encouraged to bring complaints forward. This policy was last updated on May 19, 2019. (However, we note that the website has the old policy posted and should be updated). The policy requires the senior officer to intake the complaint and specifically prohibits threatening or other coercive behaviors towards complainants.

The SFPD website allows for and informs the public on how to file complaints. Detailed information about the process and the department's commitment to impartial investigations is available at the following website: **https://www.sanfranciscopolice.org/get-service/police-complaint**.

The initial training component was significant, with tracking of roll call training. This training component continues to be supported in the two-hour segment in the basic academy and is part of the continued professional training. Sustainability submissions were focused on tracking the information received. The DPA continues to promote open dialogue and engagement. The department also continues to provide assessments at the district level, with Captains required to host two annual meetings under Field Operations Bureau (FOB) Unit Order 19-01 and then be audited by the FOB Lieutenant. Evidence of the ongoing audit process was shared. Training continues, with a primary reliance on the Principled Policing series, which focuses on community service and engagement.

The SFPD has demonstrated continued compliance with this recommendation, and continued focus on ensuring open conversations on complaints is a key issue for improved police-community relationships.

Compliance Measures	Status/Measure Met
1	Update policies regarding the critical nature of positive interactions with the public, specifically those who complain against a police officer.	√ Yes ☐ No ☐ N/A
2	Provide training reinforcement regarding the need for positive first contacts with the public and complainants.	√ Yes ☐ No ☐ N/A
3	Evidence of continuing review and improvement on this topic.	√ Yes ☐ No ☐ N/A

Finding # 61	The SFPD's Internal Affairs Division does not have standard operating procedures or templates for investigation reporting.
Recommendation # 61.1	The SFPD should develop a Standard Operating Procedures Manual detailing the scope of responsibility for all functions within the IAD. Standard operating procedures should provide guidance and advice on conflict reduction, whether internal or external to the SFPD.

Recommendation Status	Complete　　　Partially Complete　　　In Progress
	Not Started　　　No Assessment

Summary

The SFPD was granted substantial compliance in Phase 3 for 61.1 on December 17, 2020. The department reports the Internal Affairs Division (IAD) continues to follow the guidelines set forth in the Standard Operating Procedures (SOP) Manual, which itemizes all IAD Sergeants and Officer in Charge (OIC) job responsibilities. This manual is detailed and as a matter of ongoing accountability, a three-year review of the manual is recommended to ensure continued success in ensuring the quality of investigations. The current manual is from 2020, and the department identifies that updates are in progress with DPA input. This supports ongoing compliance with measures # 1 and # 4. The manual does not have an issue date, and it is recommended that future revisions reflect a publication date and that specific review periods be established to ensure appropriate updates and revisions. Information was shared relative to the quarterly SOP training and evidence provided. This demonstrates ongoing compliance with measure # 3.

The department has engaged in improved conflict resolution and fewer cases are timed out as a result of procedures implemented by the DPA, the department and the police commission. The improved interaction between DPA and SFPD has been notable during the Collaborative Reform Initiative (CRI) period. These actions, reported and observed, demonstrate compliance with measure # 2. Included are the participation in internal meetings at the executive and working group levels and participation in the SFPD's disciplinary review board, which reviews disciplinary actions and ensures consistency in recommendations and problem-solving on issues raised.

The department has demonstrated sufficient fidelity to the ongoing compliance with this recommendation.

Compliance Measures		Status/Measure Met
1	Task development of an IA SOP.	√ Yes　☐ No　☐ N/A
2	Ensure appropriate procedures for conflict resolution – e.g., when cases are assigned to DPA, IA admin or IA crim.	√ Yes　☐ No　☐ N/A
3	Train all staff on the policy.	√ Yes　☐ No　☐ N/A
4	Audit and/or review loop as to unit compliance.	√ Yes　☐ No　☐ N/A

Finding # 63	The SFPD does not fully support members performing internal affairs functions.
Recommendation # 63.2	The SFPD should continue to implement the tenets of procedural justice and ensure training include instruction on the importance of the IAD's functions to the integrity of the department and connection to the community.

Recommendation Status	<mark>Complete</mark> Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance for 63.2 on January 29, 2020.

In the original submission, the department built a catalog of training that addressed the underlying issues of accountability. The department identifies that the curriculum continues to support the role of IA and its role in community support under the principled policing curriculum. The evidence submitted supports ongoing compliance with measures # 1 and # 2.

The department issued DN-23-021, reissued since the original compliance award, demonstrating SFPD's ongoing focus on maintaining continued improvement. The other work, not submitted directly to this recommendation, demonstrates increased visibility and support.

The department has demonstrated sufficient fidelity to the ongoing compliance with this recommendation. Internally, the identification of the role as a key partner to community trust and organizational growth should continue to be a focus.

Compliance Measures		Status/Measure Met
1	Develop clear messaging on the role of IAD and its ties to the tenets of procedural justice in training.	√ Yes ☐ No ☐ N/A
2	Provide training regarding internal investigations and the role of organizational accountability.	√ Yes ☐ No ☐ N/A

Finding # 65	The SFPD does not sufficiently analyze Department of Police Accountability reports and analyses of its complaints, investigations, and case dispositions.
Recommendation # 65.1	The SFPD should develop a department-internal priority to regularly review and analyze DPA complaint reporting to identify priorities for intervention in terms of workforce culture, training, policy clarification, or leadership development.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance for 65.1 on May 19, 2021. This recommendation addresses an area that has seen significant improvement since the original assessment. The Department of Police Accountability (DPA) has replaced the Office of Citizen Complaints. With this change, a fundamental shift also occurred ensuring that the DPA owns its own data, data management and reporting. The CRI team sees this as improved assurance of independence and transparency. The significance of DPA owning its own data is much of the data review and analysis requires, at its core, coordination between SFPD and DPA.

We note that in December 2023, DPA published an audit that identified a need for better focus on the data, including areas identified in this recommendation. This is an area where SFPD can and should continue to improve. Relative to this specific recommendation, it is how the SFPD uses DPA data to inform its internal actions.

Regarding compliance measure # 1, the department has identified the role and goal of the Disciplinary Review Board (DRB) in providing ongoing analysis and insight into the disciplinary practices, including trends and actions in response. Other recommendations have identified the goal and directive for the DRB. The actions are consistent with this compliance measure and are ongoing. As identified above, additional work is warranted; however, the department has demonstrated focus and continuity to this compliance measure. There is also shared data relative to case tracking. Early on, both the DPA and the SFPD elected to go forward with distinct databases for intake, investigation and tracking officer misconduct. This has had some issues; however, the ongoing focus internally demonstrates adherence to the review and collection of DPA data to inform internal actions.

IA has an appointed analyst, reflecting ongoing compliance with compliance measure # 2, in addition to the supervisory review responsibilities for ongoing audits and reviews of data. This analyst's work is promising in ensuring the ongoing focus on and development of data to inform leadership decisions. Not only are reports now generated, but this information is used to inform reviews of disciplinary actions for potential bias and to inform the disciplinary review board. This addresses compliance measures # 3, 4 and 5.

As part of the DPA data review, the Quarterly Henderson report informs a trend analysis dashboard established by the department's technology unit. This process reflects ongoing compliance with measurements # 2, 3 and 4. SFPD outlines a process for review and distribution across the department. Subsequent supervisory actions are still evolving, but we note increased focus and awareness of officer

misconduct and complaints from the public.

The department puts forth the recurring scheduled meetings of the DRB and the meetings between the DPA and the Assistant Chief. A range of reports and directives requires review and determination of trends and solutions by personnel, including FOB Unit Order 20-03. The DRB is tasked with making recommendations to improve outcomes and is supported by evidence. These actions reflect compliance with measures # 3, 4 and 5.

Specific to compliance measure # 5, the DRB is the primary vehicle for response to trends. The DRBs identify trends with recommendations, a promising practice that continues to evolve.

Work remains, but the foundation is strong and demonstrates continued growth since the 2021 finding of substantial compliance.

The department has demonstrated sufficient fidelity to the ongoing compliance with this recommendation.

Compliance Measures		Status/Measure Met
1	Establish a data collection and review plan for DPA complaints.	√ Yes ☐ No ☐ N/A
2	Task personnel with review and analysis.	√ Yes ☐ No ☐ N/A
3	Share internally the trends and issues identified.	√ Yes ☐ No ☐ N/A
4	Continuous improvement loop as to the issues identified.	√ Yes ☐ No ☐ N/A
5	Evidence of identification of and response to issues and trends.	√ Yes ☐ No ☐ N/A

Finding # 70	The process to update Department General Orders is overly protracted and does not allow the SFPD to respond in a timely manner to emerging policing issues.
Recommendation # 70.1	The SFPD should work with the Police Commission to develop a nimble process for reviewing and approving existing and new Department General Orders that supports policing operations with codified, transparent policies.

Recommendation Status	**Complete** Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance in Phase 3 for Recommendation 70.1 on October 22, 2019. The work conducted by SFPD since that time has shown fidelity to the award of substantial compliance and the ongoing engagement of SFPD regarding continuous improvement. For example, DGO 3.01 was updated and published in 2022, after the initial award. It demonstrates the department's focus on trying to continue to improve the sustainability of the overall progress. Leading to the revision was the significant amount of time the development and review process could take, which was not a nimble process.

The department established the Policy Development Division, solely tasked with supporting policy drafts, reviews and updates through direct work, internal and external support. The SFPD has demonstrated a process that has a planned execution of DGO reviews and updates.

Conscious thought is present in the adaptations to the original policy, including breaking out the specific requirements for subject matter experts (SMEs) and the establishment of the Policy Development Division (PDD). A review of the SFPD website shows a range of ongoing issues with DGOs, including an open comment section for public policy and comments in response, and active community meetings regarding policy working groups. Additionally, there is connectivity to the Police Commission actions.

While not perfect, the SFPD demonstrates commitment to ongoing improvement of policies in a transparent manner and has demonstrated fidelity to the award of substantial compliance.

Compliance Measures		Status/Measure Met
1	Establish a plan that allows for triage regarding DGO modification - critical need; operational need; and update.	√ Yes ☐ No ☐ N/A
2	Establish a plan that allows modifications to existing DGOs that does not require review of the entire order based upon critical and operational need.	√ Yes ☐ No ☐ N/A
3	Develop a task flow that establishes timelines for submission, review and approval of DGOs that is more nimble than previous processes.	√ Yes ☐ No ☐ N/A

4	Continuous review and improvement loop.	√ Yes ☐ No ☐ N/A

Finding # 70	The process to update Department General Orders is overly protracted and does not allow the SFPD to respond in a timely manner to emerging policing issues.
Recommendation # 70.4	Input and review from external stakeholders must be completed before implementation of the practice, policy, or procedure.

Recommendation Status	**Complete** **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD was granted substantial compliance in Phase 3 on April 5, 2021, for Recommendation 70.4.

SFPD uses a website-based process to support policy review, specifically, under Policy Working Groups. Ahead of Simultaneous Concurrence, DGO 3.01 requires a 30-day public posting period to allow the public, stakeholders and department members to provide feedback. The department has demonstrated focus and commitment to ensuring transparency and public comment for SFPD policy initiatives. Additionally, the Department of Police Accountability (DPA) reviews all DGOs in Stage 1 and Stage 2 of policy development.

The SFPD provided a record of the policies that went through the public comment process. The process continues to be supported internally as reported.

Based on the evidence provided, SFPD has maintained substantial compliance with this recommendation.

Compliance Measures		Status/Measure Met
1	Establish a policy and practice on external input solicitation	√ Yes ☐ No ☐ N/A
2	Use a tracking system similar to that identified in Recommendation 70.3 to track and reconcile external comments.	√ Yes ☐ No ☐ N/A
3	Establish a review loop to ensure the concepts of procedural justice apply.	√ Yes ☐ No ☐ N/A

Finding # 72	Department Bulletins are used as a workaround for the Department General Order approval process.
Recommendation # 72.1	The SFPD should present all Department Bulletins that substantively change or countermand a Department General Order to the Police Commission before implementation and publish them on their website after approval is received.

Recommendation Status	<mark>Complete</mark> **Partially Complete** **In Progress** **Not Started** **No Assessment**

Summary

The SFPD was granted substantial compliance in Phase 2 on October 23, 2019, for Recommendation 72.1. There were two associated compliance measures.

Regarding compliance measure # 1, the 2022 revision of DGO 3.01 eliminated Department Bulletins. The Written Directive Unit (WDU) now uses Department Notices (DN) as defined in DGO 3.01.03 as, "Department-wide announcements regarding administrative matters, legal updates, or policy or operational changes that are immediately effective." The new policy limits how and when DNs can be used and specifically aligns their use to a planned process for the implementation of a DGO. The applicable directive has been engaged, and the department demonstrates a focus on the publication of DGOs. This process continues to be complex and challenging; however, as a matter of ongoing compliance, the SFPD has demonstrated fidelity to the process and continues to seek to improve the process to publish in a timely manner.

In regard to compliance measure # 2, the directives are published both pre-confirmation by the Police Commission and post-confirmation on the SFPD's website. This reporting has improved significantly since the original assessment, and the publication of the Police Commission's work continues to support transparency.

Compliance Measures		Status/Measure Met
1	Concurrent with the recommendations in Finding 70, establish a nimble process for the introduction of planned Department Bulletins to the Police Commission.	√ Yes ☐ No ☐ N/A
2	Publish Department Bulletins on the SFPD website to support transparency in practices.	√ Yes ☐ No ☐ N/A

Finding # 81	Despite a relatively good record in hiring diverse candidates, perception remains in the community that the SFPD seeks to eliminate diverse candidates from its hiring pool.
Recommendation # 81.3	The SFPD should develop and implement applicant tracking and hiring data collection and reporting procedures to capture information such as: - Recruitment sources for applicants who are hired and not hired; - Whether applicants are the result of personal referral, Internet, career center, print media, job fair, community or other outreach event, school career center, radio, television, outplacement service, or social media; - Passage rate by gender, race, and ethnicity for each major selection hurdle including written test, physical abilities, oral interview, polygraph, psychological assessment, hiring panel, and medical; - Selection rates by race, gender, and national origin; - Attrition rates by race, gender, national origin, and phase in training.

Recommendation Status	<mark>Complete</mark> Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance in Phase 3 on August 5, 2021, for Recommendation 81.3. There are four compliance measures originally associated with this recommendation. The SFPD uses a range of tracking devices to track the actions and outcomes of the overall recruiting process. The Recruitment Unit tracks its events and measures this on an annual basis. The annual recruitment report provides the overall level of detail and information required under this recommendation. While not specific within the provided evidence package, the improvement in the Physical Ability Test pass rate is indicative of the organization's ongoing improvement in addressing challenges. This too is further supported by the work submitted for the sustainability review for Recommendation 84.1. Based on the review of the evidence submitted, SFPD has maintained appropriate sustainability for the recommendation.

Compliance Measures		Status/Measure Met
1	Develop a data collection plan to collect, track and report applicant data – including how and where applicants engage in the recruiting process.	√ Yes ☐ No ☐ N/A
2	Evidence of robust data tracking and department use of data at each phase of the process.	√ Yes ☐ No ☐ N/A
3	Reports using data for all categories identified in the recommendation.	√ Yes ☐ No ☐ N/A
4	Ongoing review and/or audit for identification of trends, issues, process adjustments, etc.	√ Yes ☐ No ☐ N/A

Finding # 84	SFPD recruitment and hiring practices are disjointed.
Recommendation # 84.1	The SFPD should reorganize its recruitment and hiring practices under one bureau to provide cohesion and ensure resources are strategically used toward recruiting and hiring goals.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

The SFPD was granted substantial compliance in Phase 3 on December 3, 2020, for Recommendation 84.1. There are three compliance measures originally associated with this recommendation.

As for compliance measure # 1, the concept of a single bureau was adjusted early on to develop and focus on a unified team including three units: Staff Services, Recruiting and Backgrounds. These three units work collaboratively to focus on encouraging and supporting recruitment.

As for compliance measure # 2, evidence provided as part of the ongoing strategy and focus on recruitment included agendas from the quarterly recruitment meetings. There is an ongoing focus and discussion regarding the roles, participation and tasking of agencies. The bureau strategy and annual review identify a thoughtful process that is aligned with the goals of this recommendation.

As for compliance measure # 3, the SFPD has seen decreased application since 2016; however, the 2019 and 2023 applications are consistent (pre- and post-COVID-19). Data is now available for the process. Meeting minutes supplied identify ongoing discussions and resources intended to support a strong focus on recruitment. However, as with most law enforcement agencies, numbers are far lower than historical counts.

Compliance Measures		Status/Measure Met
1	Single SFPD bureau established for recruitment and hiring.	√ Yes ☐ No ☐ N/A
2	Evidence of strategy addressing bureau goals, objectives, resource use, etc.	√ Yes ☐ No ☐ N/A
3	Ongoing review of bureau strategy and continuous improvement loop established.	√ Yes ☐ No ☐ N/A

Appendix D: SFPD Project Plans
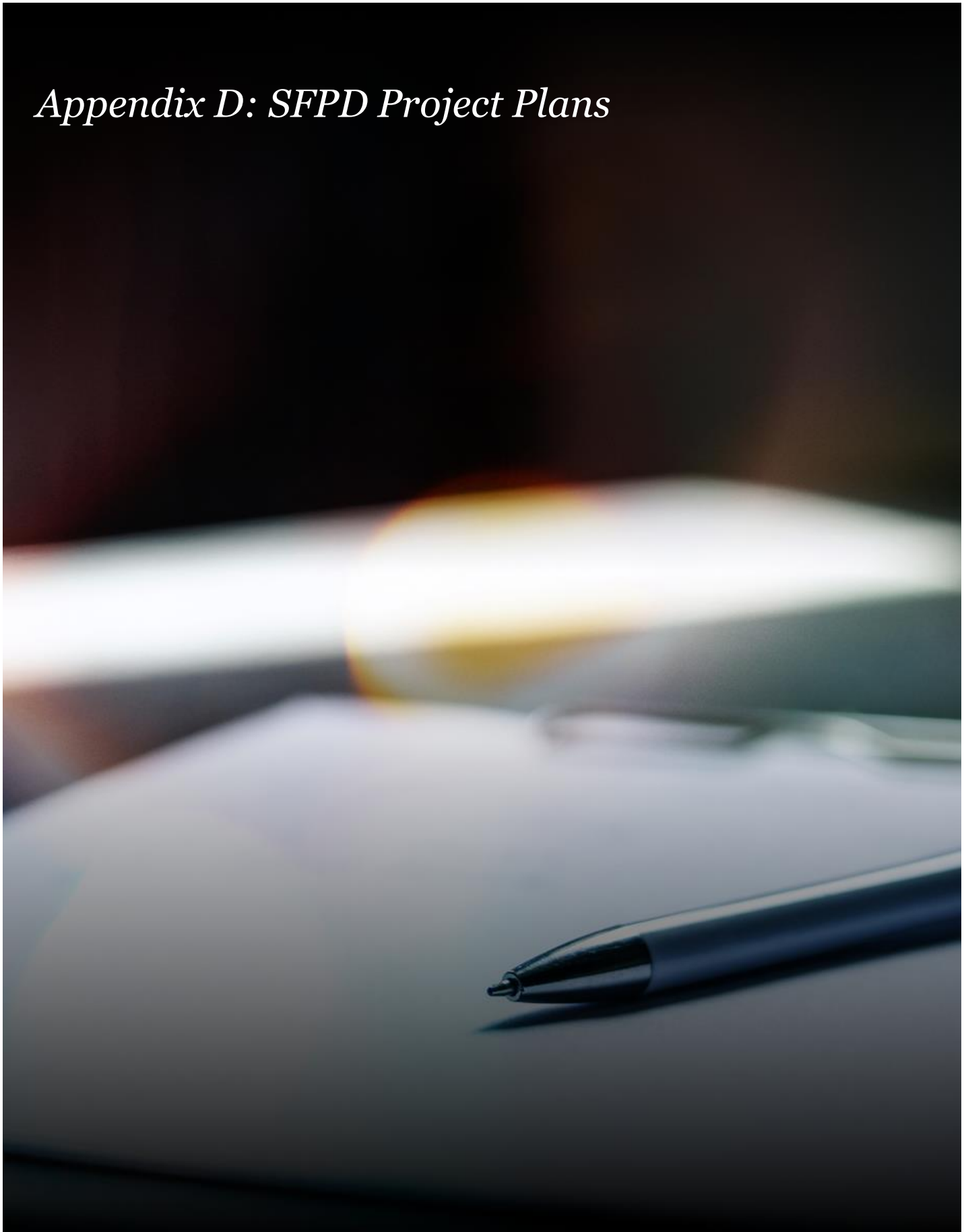
APPENDIX D: SFPD PROJECT PLANS

Project Plan # 1 – Business Intelligence Dashboard to Address Finding 20 Recommendations

Associated Recommendations: 20.1, 20.2, 20.3	Collaborative Reform assessment determined that the SFPD did not capture sufficient data on arrest and use of force incidents to support strong analysis and review of the data to improve the department's effectiveness. The recommendations included developing a reliable electronic arrest report that accurately links the arrest record to any associated use of force record; instituting audits of arrest and use of force data on a monthly basis to ensure arrest records and associated use of force reports are appropriately linked; and better coordinating with the San Francisco County Sheriff's Office to ensure the SFPD's arrest and incident records are appropriately linked where applicable.

Project Plan Status	==**Substantial Compliance**== **In Progress** **Work Required**

Summary

The SFPD committed to analyzing use of force data in response to community concerns regarding force usage and to inform department decisions on policy, supervision, and training. To do so, the department recognized it needed to advance its technological capacity to review arrest records, use of force records and incident report records. The ability to conduct an analysis of the records in a uniform manner was challenged because while use of force and incident report records are maintained by the SFPD, arrest or booking records are maintained by the San Francisco County Sheriff's Department (SFSD). Persons arrested by SFPD officers generally are booked into the County jail. Unfortunately, a review of the SFSD arrest records revealed that individual arrest records did not reflect when an SFPD officer used force to effect the arrest, nor did the arrest record always have the SFPD incident documented. This inconsistent documentation was a contributing factor in inaccurate or underreporting of use of force incidents by SFPD officers, leading to collaborative reform recommendations to assist the department in addressing the problem. The SFPD proposed this plan to address the requirements of Recommendations 20.1, 20.2 and 20.3.

Develop Reliable In-Custody Arrest Data – Recommendation 20.1

The SFPD protocols for reporting the use of force and arrests have changed significantly since the original assessment report. That assessment identified that the accuracy of records regarding arrest and the use of force was less reliable because they were collected and stored manually rather than in an accessible digital form. Since then, the department's practices have evolved to become more consistent with contemporary standards in the profession.

The department has developed a reliable electronic reporting platform for collecting and associating arrest and force data in an incident report, which is stored in the Crime Data Warehouse (CDW) database management system. Officers are now required to complete an incident report when they make an arrest

involving the use of force. The incident report is formatted to require the officer to select from a menu, which includes "Arrest Made" and "Use of Force." Once completed, the officer submits the incident report to a supervisor, who receives the incident report and the Supervisory Use of Force Evaluation Report for their review and approval. These key changes demonstrate successful migration to a platform in which arrests involving the use of force are associated in a single document and stored in a common location. In creating the electronic reporting platform, the SFPD does not have to review booking records of the San Franciso County Sheriff's Office in order to ensure arrests records and use of force records are appropriately linked.

The SFPD has completed substantial work with regard to the reporting and evaluation of the use of force. The Early Intervention System (EIS) Unit conducts a monthly audit of use of force data and provides quarterly reports to the Police Commission. In addition, the Field Tactics Force Options (FTFO) Unit reviews use of force incidents to inform policy and training development. The recommendations require the department to audit arrests that involve the use of force. The plan describes in detail the protocols established to review and report on the use of force in a way that suggests the same protocols will guide the review and reporting on arrests involving the use of force. The department should clarify whether the EIS Unit or another unit will be tasked with the responsibility for the review and reporting on arrests involving the use of force.

To ensure these processes are institutionalized, the department should update the training provided to supervisors with regard to arrests that involve the use of force to ensure appropriate supervisory review of these data. The department revised Unit Order 24-03 Use of Force Data Check (August 2024) that describes the methodology for quarterly validation between use of force and arrest data.

Recommendation

Jensen Hughes has determined the work on these recommendations to be substantially compliant. The SFPD has developed a reliable electronic recording platform that links associated arrest and use of force records to the officer's incident report. The records are stored in the department's database management system, Crime Data Warehouse, where they are accessible to department members who will be responsible for the review or audit of the records to inform decisions regarding policy, supervision, and training. The protocols include supervisory review and auditing of use of force and arrest data that supports strong analysis and reporting of the data in a manner consistent with the collaborative reform recommendations and contemporary practices.

From:	Tanya Koshy ████████████████████████
Sent:	Tuesday, October 1, 2024 1:49 AM
To:	Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject:	Project Plan 1 (Recs 20.1, 20.2, and 20.3)

[CAUTION - EXTERNAL SENDER] Warning this email comes from an external source.

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to support implementation of Project Plan 1, which comprises of Recommendations 20.1, 20.2, and 20.3.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with Project Plan 1.</u>

All three of the recommendations within Project Plan 1 concern and seek to address inadequate data collection on arrest and use of force incidents to support data analyses. As part of implementation, SFPD requires officers to complete an electronic incident report when they make an arrest involving a use of force and submit that to a supervisor. That form, along with the supervisor's use of force evaluation form, are stored in one common location, the Crime Data Warehouse. In doing so, SFPD has addressed the concerns associated with using booking records from the Sheriff's Department, which did not always reflect when an arrest involved a use of force. Moreover, having all information related to use of force incidents stored electronically within one location ensures more efficient review of those incidents.

SFPD has several mechanisms for review to ensure accuracy, consistency, and completeness of use of force data, including layers of supervisory review and a quarterly review by the Business Analysis Team. SFPD also provided evidence of the Department taking remedial action when discrepancies in the use of force data, which reflects that SFPD's processes for data integrity are working.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

Project Plan # 2 – Collaborate With Research Partner to Improve Use of Force Data Analysis

Associated Recommendations: 20.4, 21.1, 22.1	Collaborative Reform assessment determined that the SFPD did not capture sufficient data on arrest and use of force incidents to support strong analysis and review of the data to improve the department's effectiveness. The assessment also determined that the community member's race or ethnicity was not significantly associated with the severity of force or injury arising out of the officer's use of force.

Project Plan Status	Substantial Compliance **In Progress** Work Required

Summary

SFPD Project Plan # 2 describes current and planned initiatives to address the requirements of Recommendations 20.4, 21.1 and 22.1. Department General Order 5.01 Use of Force and Proper Control of Persons provides the foundation for the collection, reporting and review of use of force data. This project plan explains how the department will use external and internal resources to conduct an analysis of use of force data, including an analysis of arrests involving the use of force.

+ Recommendation 20.4: Identify a Research Partner to Refine Collection and Analysis of Force Data

+ Recommendation 21.1: Collect and Analyze Use of Force Data to Identify Patterns and Trends

+ Recommendation 22.1: The SFPD needs to improve data collection on the use of force to understand factors related to the severity of force and injuries.

The SFPD re-engaged the Center for Policing Equity (CPE) to help the department identify risks related to disparities in policing, including "burdensome and inequitable policing" pertinent to the use of force and arrests (February 1, 2024). CPE previously helped the department develop protocols to identify and reduce disparities in stop data. Although the CPE partnership is in its initial stage, the completed work product will include the identification and analysis of force trends over time and provide the department with tools to address the identified deficiencies in a manner consistent with this recommendation.

Internally, the Business Analysis Team (BAT) Unit and the Field Tactics Force Options (FTFO) Unit collaborate to analyze force data and to develop training to remediate any use of force determined to be inconsistent with department expectations and/or policy. FTFO analysis has been used to inform modifications to DGO 5.01 and to the Serious Incident Review Board protocols. The FTFO and BAT Units also reviewed an internal research document that discusses the "Effects of Officer Race on Use of Force Severity," published by a member of the SFPD FTFO Unit. The goal is to use the information learned from this report to augment the development of appropriate strategies to remediate deficiencies and disparities related to the use of force.

This project plan reflects a solid combination of short and long-term strategies, which demonstrate the degree to which the SFPD continues to improve its capacity to collect and analyze force data to respond to community concerns regarding unnecessary, excessive or disparities in the use of force by SFPD members.

Jensen Hughes has determined the work on these recommendations to be substantially compliant. The department entered into a comprehensive agreement with an external research organization to evaluate use of force data for purposes consistent with the applicable Collaborative Reform Initiative (CRI) recommendations. In addition, the department also improved its internal capacity to collect and analyze force data to inform policy, supervision and training.

Moving forward, the department should continue to collaborate with the Department of Police Accountability (DPA) regarding audits of use of force and commit to regular reporting of force analysis to the Police Commission and/or the California Department of Justice generally, and specifically with regard to disparities related to race the planned strategies to remediate the identified deficiencies.

From:	Tanya Koshy ████████████████████
Sent:	Monday, September 30, 2024 6:21 PM
To:	Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject:	Project Plan 2 (Recs 20.4, 21.1, and 22.2)

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to support implementation of Project Plan 2, which comprises of Recommendations 20.4, 21.1, and 22.2.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with Project Plan 2.</u>

All three of the recommendations within Project Plan 2 concern collection and analyses of use of force data to identity patterns and trends. To implement these recommendations, SFPD entered into a MOU with the Center for Policing Equity (CPE) to review and evaluate use of force data and specifically to understand causal factors behind the use of force.

SFPD has also improved its use of force reporting and evaluation forms to collect a wide range of data about each use of force incident. With that data, SFPD's Field Tactics Force Options Unit evaluates use of force for training needs and its Business Intelligence team and Business Analysis Team analyzes data and identify patterns and trends for various local and state reporting requirements. SFPD provided an example of how analyses of trends in use of force have been addressed: SFPD determined that nearly all officers responding to a high-risk incident would draw their firearms and act as lethal cover, at the exclusion of other necessary roles and functions (e.g., less-lethal cover). To address this issue, SFPD's Critical Mindset and Coordinated Response (CMCR) course emphasized reducing the pointing of the firearm and focusing on less-lethal covers, communication, and containment, among other roles and functions that are critical to reduce the likelihood that force will be used. SFPD has since tracked the pointing of firearms and have provided evidence to show that it has been reduced over the years, which shows at least a correlation between the CMCR course and on-the-ground practices. SFPD's package includes additional information demonstrating substantial compliance with this recommendation.

If you have any questions, please do not hesitate to reach out.
Thank you,

Tanya Koshy

Project Plan # 3 – Community Collaboration and Input Regarding Training and Policing Priorities

Associated Recommendations: 26.1, 48.1, 48.2	Collaborative Reform assessment determined a need to create opportunities and embrace community input regarding bias training and policing services across all communities. To accomplish these goals, the department was encouraged to reinvigorate the Community Policing Advisory Forum and develop an annual reporting and measurement process to track the issues raised by the forums and addressed by the department. This project plan explains how the department will address the requirements of these recommendations.

Project Plan Status	==**Substantial Compliance**== **In Progress** **Work Required**

Summary

The SFPD reestablished the Chief's Community Policing Advisory Forum (CCPAF) to seek community input into the policies and practices of the department. Police Chief William Scott promulgated the Chief's Community Policing Advisory Forum Policy, which guides the mission and goals of the forum but also includes the application and selection criteria, the roles and capacities of members, guidance on how to successfully engage in problem solving, and guidance on the members' expected roles in outreach and engagement. The policy – outlined in Department Notice 23-157 Chief's Community Policing Advisory Forum, September 28, 2023 – is comprehensive and addresses all the duties, expectations and obligations of a member to the group and the duties, expectations and obligations of the department to assist the group to perform its mission successfully.

Within the structure of the CCPAF, Department Advisory Forums advise the Chief of Police on issues or concerns related to their representative affiliations or community groups. The policy provides that the representative groups may include groups based on race or heritage, gender, religion, youth, or small business.

The CCPAF meets quarterly and held its first meeting in November 2023, followed by a subsequent meeting in February 2024. Representatives from the SFPD Community Engagement Division (CED) attend the meetings and are responsible for recording the meeting minutes and coordinating any response to action items or discussions that require follow-up or further review. The CED administers a post-meeting survey of CCPAF members seeking member perspectives of the meetings, which can be addressed in a follow-up response to the member individually or to the group, as necessary. Information learned through the survey responses is also used to continuously improve the department's community engagement strategies. The policy tasks the CED with completing the CCPAF annual report, which will describe the CCPAF activity occurring during the year and its planned activity for the next year.

Community engagement and outreach is not limited to engagement with Chief Scott or the CED. Each department unit is required to complete a community policing strategic plan which identifies goals and strategies for their assigned district or focus area. The CED Commander will conduct an annual audit of these strategic plans and will ensure that all department units conduct regular meetings and offer the

community multiple and varied opportunities to give input on department operations.

Recommendation

The SFPD has successfully reengaged community forums and advisors to inform the department's policing initiatives and services. Although insufficient time has elapsed to allow an assessment of their impact, the guiding policy and protocols are properly structured to allow meaningful input to the Chief of Police and SFPD leaders. The SFPD is encouraged to seek the CCPAF's direct input into policies and practices related to bias, use of force and other issues of public concern. The SFPD should also ensure records relating to CCPAF deliberations are transparent and reported on an annual basis to the department website, to the Police Commission and to the California Department of Justice, as appropriate.

This plan ensures the department's compliance with Recommendations 26.1, 48.1 and 48.2.

From: Tanya Koshy ████████████████████████████
Sent: Monday, September 30, 2024 6:20 PM
To: Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc: Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject: CORRECTION: Project Plan 3 (Recs 26.1, 48.1, and 48.2)

Correction to the subject line. The below email summarizes substantial compliance to Project Plan 3.

From: Tanya Koshy
Sent: Monday, September 30, 2024 4:19 PM
To: 'Scott, William (POL)' ████████████████████████; 'McGuire, Catherine (POL)' ██████████████████████████;
'Peregrina, Chandra (POL)' ████████████████████; 'Nevarez, Jesus (POL)' ████████████████; 'Wright,
Deshawn (POL)' ████████████████████; 'Tran, Jimmy (POL)' ████████████████; 'Hilder, Candy (POL)'
████████████████████;
Cc: 'Kirby, Debra' ██████████████████████; 'Dirden, Michael' ██████████████████████; 'Morgan,
Lindsay'
Subject: Project Plan 5 (Recs 26.1, 48.1, and 48.2)

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to support implementation of Project Plan 3, which comprises of Recommendations 26.1, 48.1, and 48.2.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with Project Plan 3.</u>

All three of the recommendations within Project Plan 3 relate providing community input on policing priorities, including anti-bias policies and practices.

To implement these recommendations, SFPD has re-established the Chief's Community Police Advisory Forum (CCPAF), which is comprised of members of the public who are charged with identifing issues affecting communities within San Francisco and advising SFPD on how to address them. SFPD provided documentation of how it reinvigorated the CCPAF and the discussions in the first few meetings. SFPD has not yet completed an annual report on the CCPAF because it has not yet completed a year's worth of meetings. However, Jensen Hughes and Cal DOJ agreed that SFPD can demonstrate compliance by demonstrating a plan for that annual reporting. SFPD has provided a plan to include the CCPAF annual report as part of the Community Engagement Division's Annual Report and will specifically track issues and concerns surfaced by the CCPAF.

SFPD's package includes additional information demonstrating substantial compliance with this recommendation.

If you have any questions, please do not hesitate to reach out.

Thank you,

Tanya Koshy

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Project Plan # 4 – Management Dashboard

| **Associated Recommendations: 28.1, 28.4, 28.5, 30.3, 30.4, 35.3, 79.1, 79.2, 79.3** | The SFPD engaged in the development of a management dashboard to address the related recommendations touching upon ongoing supervision and accountability to professional policing. On its surface, there is some disconnect in the areas of the recommendations; however, they all address data management and its application to issues of police bias – implicit and explicit, stop data and in performance management. As for the latter, the connectivity is to ensure that the department supports internal procedural justice for its personnel in evaluations and promotions, both as a matter of assignment and rank.

It should be noted that not all of the work is an outcome of the compliance review for the collaborative reform recommendations. SFPD is seeking to harness and improve its overall use and management of data related to its operations and personnel. This review addresses the plan as it relates to the collaborative reform recommendations. |

Project Plan Status	Substantial Compliance ==In Progress== Work Required

Summary

This project plan was the evolution of work conducted throughout the Collaborative Reform Initiative. Many of the challenges in completing the referenced recommendations resulted from the limitations of SFPD's data systems and its ability to ensure sufficient information for managers to make decisions relative to employee performance. As part of the final phase of work under collaborative reform, SFPD developed a strategy that was holistic in its approach and sought to link similar issues within the open recommendations to ensure a directed work focus and flow. The project plan submitted and reviewed is detailed regarding the work of SFPD from September 2022 through October 2024, which expanded beyond the period of performance under this phase of the engagement. Additional information was submitted based on Jensen Hughes feedback that helped to ensure the proposed actions did in fact progress and helped to establish the department's capacity to continue to move forward to substantial compliance with this project plan.

SFPD selected an ambitious program to address the lack of data and information coordination regarding personnel performance – the link to the referenced recommendations within the project plan. The department has initiated the development of a management dashboard that will directly pull data from its systems, including its warehouse for Racial and Identity Profiling Act (RIPA) data, human resource data (HRMS), Axon – the body-worn camera (BWC) footage – and crime data. SFPD is using an outside vendor to build the management dashboard (MD), and this vendor has been engaged to do so since September 2022. This project plan is aimed at not only accurately collecting the data but also ensuring that it is provided to managers to help inform their engagement with their subordinates and others, the long-term goal being visibility and accountability relative to officer engagement. The MD further seeks to provide the data and analytical support to assess and review organizational performance and its impact on officer actions. The ease of data access, the tools to help inform overall performance and within the context of peer groups and

similarly situated work groups, is a key initiative under the MD.

In this project plan, SFPD undertakes one of the more challenging issues in law enforcement - managing and tracking officer behaviors through visibility at the micro and macro levels. This activity is traditionally relegated to calls for service data, and reports are submitted as a matter of direct count. What makes this plan even more relevant is the goal to identify anomalies that may indicate disparity and seek to provide data that will support an analysis of the reasons that may contribute.

As of this review, the department has not met its identified goals in advancing this project plan. SFPD has engaged in significant work in addressing this area of strategic reform. However, while goals have been identified, the plan has not been completed.

To support an ongoing implementation plan, the SFPD has established a realistic timeline for implementation and has demonstrated in the last year its focus on delivering to those timelines. While not always achieved, the focus and drafted approach bode well for continued progress on this important initiative. Training, the DGO and the pilot have not initiated as of this review and submission. However, a draft directive and the planned training guidance have been reviewed, and we find it to be consistent with the goals of the project plan.

<u>Stop Data</u>

The project plan also includes certain recommendations addressing the recording and supervision of stops by SFPD officers. The overall environment for this data has changed in California with the implementation of the RIPA guidance and mandatory reporting, making some of the original recommendations obsolete. The data collection and reporting proposed under the MD rollout will provide for timely analysis of the mandatory RIPA data reporting. The MD will provide this data in real time to supervisors – for the officer, the peer group and larger comparison groups (e.g., district, watch, unit or department). SFPD sufficiently describes its rationale and application of the data parameters and measures used in the development plan. SFPD seeks to expand the state reporting of "stop in response to call for service" to include call for service, on-view, self-initiated, command directed (such as a specific police operation), intelligence-based or in relation to special assignment, such as assignment to concerts. The goal is to understand whether disparity in RIPA-reported data is influenced by methods of assignment. Other planned additional data collection within the MD to better inform managers of trends regarding unit activity includes partners present on stops; arrest record information for the person stopped; residency; and the order of the type of search conducted during a stop (e.g., vehicle inventory then search). SFPD believes these additional data captures will add depth to the information and evaluation.

Jensen Hughes notes that the ongoing project management will need to be prepared for and have agility regarding:

- The integration of the data and reporting with the current and future state data systems.
- The agility to update to meet legal requirements or annual updates.
- The oversight of data entry accuracy – compliance trends, anomalies, testing for right selection for reasons for stops and other such measures.

As described to Jensen Hughes, the goal is meaningful data collection and analysis. MD implementation as planned has the potential to have a significant impact on the way officers are managed in San Francisco.

Training

SFPD will train supervisors on the evaluation of the data and the expectations under the proposed departmental program. Education will center on recognition and options for redirecting behaviors. Training will incorporate POST e-learning courses but also seeks to be iterative in response to the planned training and pilot in the Southern District. SFPD has filmed a video with the Chief identifying the importance of the program and the goals of the department in implementing this program.

The department plans to provide training tools, in the form of videos, for key portions of the Stop Data System and Management Dashboard under development by its contracted vendor. These videos were not available to the Jensen Hughes team for review. However, the plan associated with the training and the recognition of the need to update further as the department moves into a formal program following the pilot reflect a thoughtful and measured approach to the implementation and education of supervisors tasked with managing the program.

Jensen Hughes notes that the ongoing project management will need to be prepared for:

- The integration of training and department goals – the data and reporting with the state system.
- Training that addresses both guidance for data entry but also employee management, coaching and intervention.
- Plans for the pilot in the Southern District – specifically on effective supervisory coaching practices.
- User input and the ability to course correct the plan.
- Ongoing training support for supervisors tasked with making key decisions.
- The chain of command's role in ensuring compliance and sufficiency of responses with the overarching program goals.

Policies and Draft Notices

The department has provided a range of supportive policies (see Attachments 5-8), including a draft notice for the Management Dashboard Pilot in the Southern District that is scheduled to go live in the first quarter of 2025. There is also a draft directive on how and when performance reviews will occur, as well as the RIPA regulatory update policy. These seem sufficiently defined and provide guidance to supervisors tasked with implementing the MD goals.

Jensen Hughes notes that the ongoing project management will need to be prepared for and have agility regarding necessary policy changes including:

- The integration of training and policy – the need for specificity and tools for engagement.
- The performance evaluation policy and planned rollout – including oversight of timely completion.
- The chain of command's defined roles and responsibilities in ensuring compliance and sufficiency of tasking with the overarching program goals

- Non-compliance review – training for supervisors, etc.

Recommendation

SFPD is squarely in progress on this project plan and has provided a vision and path forward as outlined in the policy planning, timeline and overall approach to the implementation of the recommendations in this project plan.

SFPD has engaged in an ambitious plan to engage its members and to identify the behaviors and performance of its officers. The outcome of this work has the potential to inform law enforcement practices across California. SFPD demonstrates sufficient focus, understanding and initial analysis of the impact of disparity in policing, and this plan evidences its commitment to better understanding and informed organizational response.

The supporting software for this plan has not been fully tested and continues to be refined. There is a specific project plan for the MD and the data it collects. Jensen Hughes anticipates this will continue to evolve, and we note concerns for scope creep in the pursuit of even more data. SFPD will have to manage the implementation and believe there is sufficient rigor and goal setting to accomplish the implementation consistent with the timeline provided.

Finally, this plan is not complete because, in part, it is testing unchartered waters. SFPD will need to make the commitment to ensuring completion as envisioned under the CRI and its own stated goals in improving policing in San Francisco.

SFPD submits this as the project plan forward. Jensen Hughes recommends that quarterly reports should be provided to the Police Commission that detail compliance with the project plan and timeline, as well as report on specific achievements, delays and project management adaptations pending completion of the plan. These reports should be posted on the department's website pending completion of the project plan.

From:	Tanya Koshy ████████████████████
Sent:	Sunday, November 10, 2024 12:38 PM
To:	Morgan, Lindsay; McGuire, Catherine (POL); Frost, Sean (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael
Subject:	RE: Jensen Hughes Review: SFPD Updated Project Plan 4

Good morning,

After reviewing SFPD's submission for Project Plan 4, Cal DOJ concurs with Jensen Hughes' review and conclusions.

Thank you,

Tanya

Tanya Koshy (she/her)
Deputy Attorney General
Police Practices Section
California Department of Justice

From: Morgan, Lindsay ████████████████████
Sent: Wednesday, October 30, 2024 12:35 PM
To: McGuire, Catherine (POL) ███████████████████; Frost, Sean (POL) ████████████████; Peregrina, Chandra (POL) ██████████████████; Nevarez, Jesus (POL) ███████████████; Wright, Deshawn (POL) ██████████████; Tran, Jimmy (POL) █████████████; Hilder, Candy (POL)

Cc: Tanya Koshy ████████████████; Kirby, Debra ██████████████████; Dirden, Michael ████████████████████
Subject: Jensen Hughes Review: SFPD Updated Project Plan 4

Good afternoon all,

Attached please find the outcomes of Jensen Hughes' review of SFPD's Management Dashboard Project Plan 4 and let us know if you have any questions.

Thank you,
Lindsay

LINDSAY MORGAN, PMP
Senior Director, Project Excellence

jensenhughes.com

Project Plan # 5 – Accountability	
Associated Recommendations: 69.2, 69.3	This project plan was designed to link the shared concept of internal procedural justice and transparency in how and when discipline is applied. Under Phase 3+, SFPD engaged in the work to systematically address discipline practices within the department and to understand whether there were variations based upon officer demographics, including the application of past discipline.

Project Plan Status	<mark>**Substantial Compliance**</mark> **In Progress** **Work Required**

Summary

This project plan was the evolution of work conducted throughout the initial Collaborative Reform Initiative. The department has committed resources and efforts to transforming the way it addresses discipline matters. The accountability and transparency of a police department regarding how it addresses public complaints and officer discipline are foundations for community trust building. Transparency and accountability are just as important internally in developing procedural justice and trust among officers that misconduct will be addressed timely, appropriately and fairly.

As part of a larger overall plan and action, SFPD began to address discipline in a holistic manner. Included were the City's goals, including the 2020 Police Reform Roadmap, and the department's internal goals, including the Racial Equity and Inclusion Action Plan. The department has moved forward in becoming more transparent internally regarding discipline and in assessing whether there are negative impacts for certain groups within the department as it relates to discipline.

In the years following the assessment report, SFPD expanded its capacity for data and understanding of complaint data. This was a pivotal step toward understanding the nature of the complaints received and how the department manages them. SFPD partnered more fully with the Department of Police Accountability (DPA) during this period as well, involving DPA in training, meetings at the executive and working group level, and a defined role in policy development and membership on the disciplinary review board (DRB). This work has centered on growing one of the assessment report's goals – a shared management environment. While the SFPD and DPA have distinct, independent roles, there is shared responsibility for the effectiveness of discipline investigations and the recommendations for discipline.

From a transparency perspective, the SFPD shares its complaint information and progress on a quarterly basis with the Police Commission. This data is then published and has open access. Additionally, SFPD continues to publish its annual report regarding IA data, as called for in the original assessment report. The developing analytical approach to complaint information should make this report more informative and, ideally, user-friendly. Attachment 5 is a quarterly report shared with the Police Commission. Notable is the listing of complaints investigated by SFPD, as some community members still do not know what complaints are addressed by the department and what are addressed by DPA. Additionally, there is a glossary at the end of the report that defines terms used within the report which is a notable advancement for the

transparency of actions and decisions of SFPD.

During this phase, SFPD established the Office of Equity and Inclusion (OEI) internally, and it was tasked under a Department Notice to assess and review the impact of discipline decisions on the various demographic groups represented in SFPD officers. It also serves as a resource for the internal DRB and can make recommendations for corrective action based on the issues identified. The DRB is established by DGO and is mandated to meet quarterly to review and discuss discipline trends, polices, procedures and training. DPA, the Police Commission and executive members of SFPD are Included on the DRB. The DRB may make recommendations on process improvements and task recommendations with a timeline for execution. It reports quarterly to the Police Commission relative to recommended changes and the status of implementation.

Notably, the department has assigned an analyst to the Internal Affairs Division to review and assess discipline data for trends, compliance with policy, as well as to assess outcomes, including based on demographic data for officers. This analyst is tasked with quarterly reports – for both internal and external use, including review and assessment by the OEI. The quarterly report was expanded to address issues for review regarding internal officer demographics and continues to be refined based on the input of the OEI and DRB. The report has a level of detail and breakdown to inform management review and DRB review.

SFPD has identified a focus on closed cases rather than just the individual active case. Review of the types of complaints and their outcomes is informative to the organizational practice regarding the investigation of misconduct, the investigative finding and the way in which discipline is administered.

Areas of Note

- The work of the DRB, OEI and data analysis is relatively new, so the "proofs" of engagement are relatively limited. The initial work and structures are promising, and it will require SFPD to continue to build upon its goals for internal procedural justice and equity in discipline of SFPD officers. Attachment 10 is a good example of the iterative growth of the process, wherein OEI discussed noted variances in discipline and worked with IA to understand the underlying factors. Detailed information would help further inform this process, as the submitted examples are fairly standard. However, Attachment 11 identifies the methodology to be used, providing an informed and defined standard to the analysis, which is helpful and ensures consistency in review.

- Jensen Hughes anticipates ongoing analysis will further refine the data to ensure it is informative and helpful for training, transparency and consistency relative to officer conduct and the investigation of complaints of misconduct. As with any relatively new practice, this report will and should evolve as those who consume and manage the data become more informed. For example, in Attachment 12, one of the recommendations from the DRB was to further refine the definition for "aggregate trend," which indicates the data is informing decisions and personnel are seeking consistent definition.

- The DRB's role in establishing recommendations for improvement and reporting to the Police Commission will help maintain the fidelity to the goal of this project plan.

Recommendation

Jensen Hughes has determined the work in support of this project plan to be substantially compliant. SFPD

has engaged in a significant amount of work in already achieving substantial compliance on a number of recommendations that address transparency, accountability and police misconduct. SFPD has demonstrated a continued focus on reviewing the actions of the department relative to misconduct as a matter of both external and internal procedural justice. The goals of the project plan are consistent with the recommendations.

It is anticipated that the department will continue to work in this area to ensure ongoing transparency and improvement in internal procedural justice.

From:	Tanya Koshy ████████████████
Sent:	Monday, September 30, 2024 6:19 PM
To:	Scott, William (POL); McGuire, Catherine (POL); Peregrina, Chandra (POL); Nevarez, Jesus (POL); Wright, Deshawn (POL); Tran, Jimmy (POL); Hilder, Candy (POL)
Cc:	Kirby, Debra; Dirden, Michael; Morgan, Lindsay
Subject:	Project Plan 5 (Recs 69.2 and 69.3)

Dear Chief Scott,

Our office has completed its review of the materials submitted by SFPD to support implementation of Project Plan 5, which comprises of Recommendations 69.2 and 69.3.

<u>For the following reasons, the Department of Justice finds that SFPD is in substantial compliance with Project Plan 5.</u>

Both of the recommendations within Project Plan 5 relate to improving analyses of officer discipline for purposes of ensuring fairness, impartiality, and transparency. SFPD has tasked the existing Disciplinary Review Board (DRB), comprised of the Assistant Chief of Staff, Deputy Chief of the Administration Bureau, Deputy Chief of Field Operations Bureau, a Police Commissioner, and the Director of the Department of Police Accountability, with reviewing internal discipline on a quarterly basis to ensure fairness and impartiality. SFPD also established an Office of Equity and Inclusion (OEI) to review discipline decisions and any potential disparities, and provides such information to the DRB. To assist this work the Internal Affairs Division has an analyst responsible for conducting analyses of discipline data, and prepares quarterly internal and external reports on such trends.

Cal DOJ agrees with Jensen Hughes that a caveat to substantial compliance is that the work of the DRB and OEI is new; however, there are examples within the materials provided by SFPD to demonstrate that SFPD has developed strong internal practices to ensure that the DRB and the OEI will continue its work effectively and, in doing so, bolster internal procedural justice at SFPD.

Tanya

Appendix E: Project Team
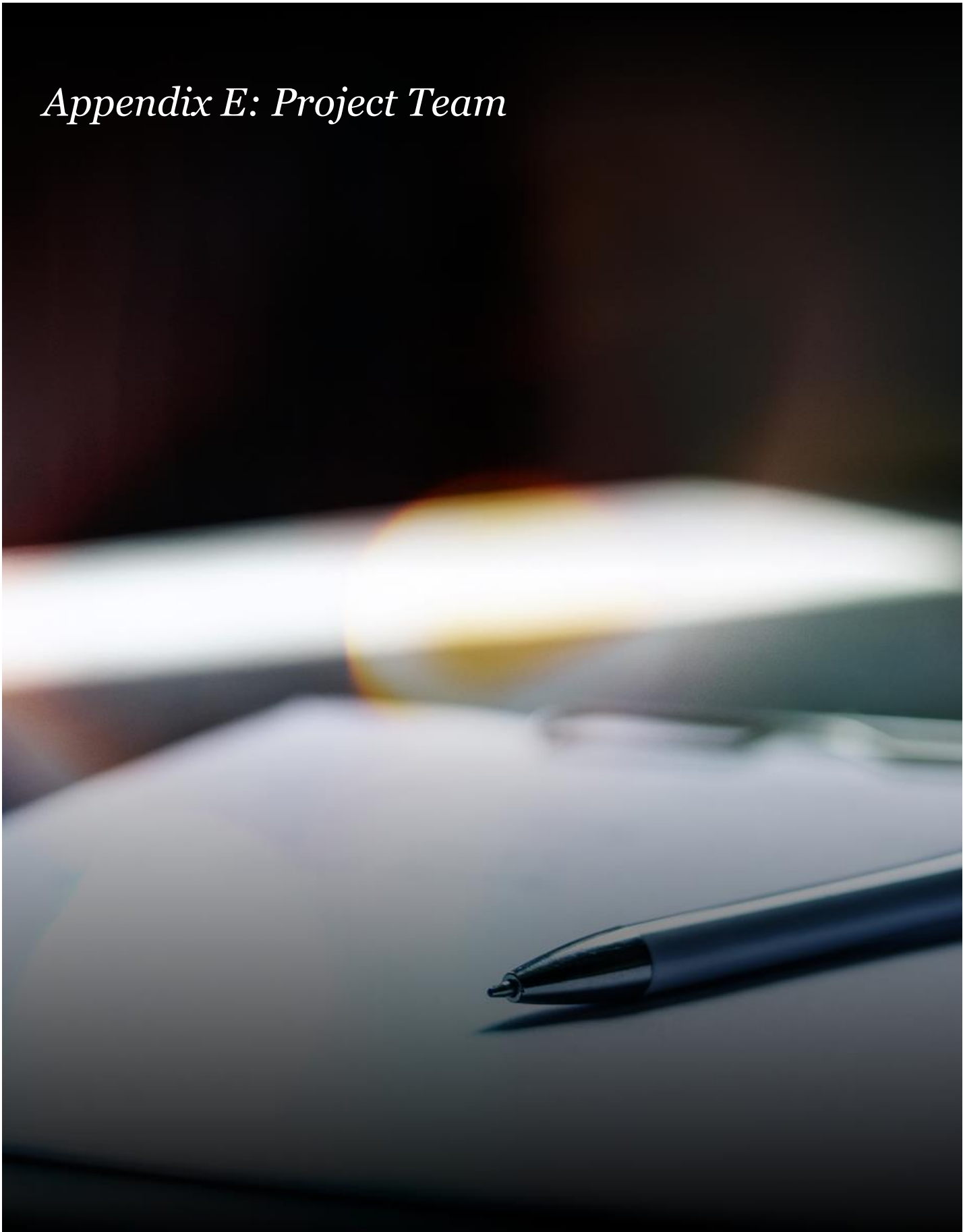
APPENDIX E: PROJECT TEAM

The Collaborative Reform Initiative Team

The Collaborative Reform Initiative (CRI) Team had a collaborative approach to oversight. As CRI progressed, the work of the California Department of Justice (CADOJ) and Jensen Hughes moved to intense technical support to help the San Francisco Police Department (SFPD) achieve its goals. Direct engagement with executive sponsors, recommendation managers and subject matter experts facilitated the strength of the reporting on the work to complete the individual recommendations. As substantive issues arose, the executive team was available to address and resolve them in a timely and appropriate manner. The CRI Team owned and shared the success.

The CADOJ Team and the Role of Oversight

In 2017, after the U.S. Department of Justice (USDOJ) pulled out of the Collaborative Reform Initiative for Technical Assistance (CRITA) agreement, SFPD lacked support to accomplish its collaborative reform goals. Although the department committed to implementing the reform with its existing resources, it knew that the public required assurance that an independent review of its work was being completed. At the City of San Francisco's request, CADOJ served as an independent monitor for what was now called the Collaborative Reform Initiative (CRI). CADOJ's role, pursuant to its agreement with the City, was to serve as the independent third-party reviewer of the SFPD's implementation of the recommendations set forth in the USDOJ report and to issue periodic reports to the public. Under former Attorney General Xavier Becerra and incumbent Attorney General Rob Bonta, the CADOJ Civil Rights Enforcement Section is the monitoring partner for CRI. Supervising Deputy Attorney General Nancy Beninati led the team that includes Deputy Attorneys General Tanya Koshy and Gabriel Martinez. Their work included monitoring and technical assistance. They provided guidance, direction and advisory support to SFPD in achieving its reform goals. It is clear that their work has been instrumental in helping SFPD be successful.

The Jensen Hughes Monitoring Team

Jensen Hughes is one of the nation's foremost strategic advisory firms specializing in independent ethics, integrity and oversight services with a special focus on federal, state and local law enforcement agencies, including police departments, sheriff's departments and internal affairs bureaus. We provide strategic thought leadership, trusted counsel and implementation services that help leading organizations target and achieve strategic and transformational levels of excellence in law enforcement, security and investigations. Many of our team members have been responsible for leading the significant transformation of many major city police departments and law enforcement agencies.

DEBRA KIRBY, JD, MA, GLOBAL SERVICE LINE LEADER, LAW ENFORCEMENT CONSULTING + INVESTIGATIONS

Debra Kirby has been a lifelong champion of accountable policing practices in the U.S. and in Ireland. In her current role, Debra continues to leverage her law enforcement expertise to help police departments achieve reform across the country. Following her work with the U.S. Department of Justice's Office of Community Oriented Policing Services Collaborative Reform Initiative for Technical Assistance (CRITA), she continues to serve clients and communities on a range of law enforcement and security risk engagements that help deliver safety, resilience and improved policing practices. Earlier in her career, she worked as Deputy Chief Inspector of the Garda Siochana Inspectorate, an agency tasked with making policy and practice recommendations for An Garda Siochana, the national police force of Ireland. She retired as Chief of the Chicago Police Department, where she improved the delivery of police services and developed expertise in labor management, officer-involved shooting investigations, criminal investigations, large-scale demonstrations, and internal affairs and accountability. A licensed attorney, Debra also has a master's degree in Homeland Security from the Naval Postgraduate School and a Juris Doctor from the John Marshall Law School in Chicago.

LINDSAY MORGAN, PMP, SENIOR DIRECTOR, PROJECT EXCELLENCE

Lindsay Morgan's background includes experience working with cross-sections of government at the local, state and federal levels, along with diverse community stakeholders, through the management of complex projects for different law enforcement agencies with the Department of Justice and the Department of Homeland Security. With Jensen Hughes, Lindsay was responsible for managing the operation of independent assessments of police departments as Program Manager for the $50 million IDIQ supporting the U.S. Department of Justice's (CRITA) program, which included constitutional policing audits and bias-based assessments; community-oriented policing strategies; the development and application of crime-reduction strategies; and collaboration, community partnerships and information sharing. She holds a Master of Business Administration in project management from the George Mason University School of Business and a PMP certification.

MICHAEL A. DIRDEN, J. D., SUBJECT MATTER EXPERT

Michael Dirden joined Jensen Hughes following a long and successful career with the Houston Police Department in Texas. As the Executive Assistant Chief of Police, Michael provided leadership and oversight for the department's Investigative, Strategic and Field Operations, including accountability for Patrol Operations, Traffic Enforcement, the Mental Health Division, Apartment Enforcement and Differential Police. Since 2015, Michael has worked with Jensen Hughes on numerous law enforcement assessment and reform projects. He was a key subject matter expert in the review and analysis of police department operations in San Francisco under CRITA, as well as CRITA assessments for several other law enforcement agencies. Michael holds a Juris Doctorate from the South Texas College of Law, a Master of Science from Sam Houston State University and a Bachelor of Arts in economics from the University of Texas.

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