COLLABORATIVE REFORM INITIATIVE

An Assessment of the San Francisco Police Department

Executive Summary

Findings & Recommendations

OCTOBER 2016

COPS
Community Oriented Policing Services
U.S. Department of Justice

The Internet references cited in this publication were valid as of the date of publication. Given that URLs and websites are in constant flux, the COPS Office cannot vouch for their current validity.

Recommended citation:
COPS Office. 2016. *An Assessment of the San Francisco Police Department: Executive Summary, Findings, and Recommendations*. Collaborative Reform Initiative. Washington, DC: Office of Community Oriented Policing Services.

Published 2016

Contents

Executive Summary **1**

Background 1

Outreach 2

About Collaborative Reform 2

Goal and objectives of Collaborative Reform 2

Key findings 3

Conclusions 5

Findings and recommendations **6**

Finding 1 6

Finding 2 6

Finding 3 7

Finding 4 7

Finding 5 8

Finding 6 9

Finding 7 9

Finding 8 10

Finding 9 11

Finding 10 11

Finding 11 12

Finding 12 13

Finding 13 14

Finding 14 14

Finding 15 15

Finding 16 15

Finding 17 16

Finding 18 16

Finding 19 16

Finding 20 17

Finding 21 18

Finding 22 18

Finding 23 18
Finding 24 19
Finding 25 20
Finding 26 21
Finding 27 21
Finding 28 22
Finding 29 23
Finding 30 24
Finding 31 25
Finding 32 25
Finding 33 26
Finding 34 26
Finding 35 26
Finding 36 27
Finding 37 27
Finding 38 28
Finding 39 28
Finding 40 30
Finding 41 31
Finding 42 32
Finding 43 33
Finding 44 34
Finding 45 34
Finding 46 35
Finding 47 36
Finding 48 36
Finding 49 36
Finding 50 37
Finding 51 37
Finding 52 38
Finding 53 38
Finding 54 39

Finding 55 39
Finding 56 39
Finding 57 40
Finding 58 41
Finding 59 41
Finding 60 42
Finding 61 42
Finding 62 43
Finding 63 43
Finding 64 44
Finding 65 45
Finding 66 45
Finding 67 46
Finding 68 46
Finding 69 47
Finding 70 47
Finding 71 48
Finding 72 48
Finding 73 49
Finding 74 49
Finding 75 49
Finding 76 50
Finding 77 50
Finding 78 51
Finding 79 51
Finding 80 51
Finding 81 52
Finding 82 53
Finding 83 53
Finding 84 54
Finding 85 55
Finding 86 55

Finding 87 56
Finding 88 56
Finding 89 57
Finding 90 57
Finding 91 57
Finding 92 58
Finding 93 58
Finding 94 59
About the COPS Office 60

Executive Summary

As a result of an extensive independent assessment of the San Francisco Police Department's (SFPD) activities and operations, the U.S. Department of Justice (DOJ) Office of Community Oriented Policing Services (COPS Office) presents findings and recommendations on how to address the agency's needs proactively in a long-term manner to improve trust between the SFPD and the communities it serves.

Background

San Francisco, California, is one of the country's most iconic cities, known as much for its hills and vistas as for its progressive political climate. Indeed, identification of counterculture movements can be invoked merely by naming some of the city's neighborhoods, including Haight-Ashbury and the Castro. Today, San Francisco and other Bay Area communities like Berkeley and Oakland are leading the nation's conversations around questions of police accountability, civic engagement, constitutional policing, police use of force, and individual rights.

These are timely conversations because police-community relations in the United States have reached a pivotal moment. Recent highly publicized events involving law enforcement officials, particularly officer-involved shooting incidents, have communities questioning the integrity of police, the rights of individuals, and the role of the community in ensuring that police practices align with community expectations.

The people of San Francisco are among the voices calling for urgency in police reform and building trust between law enforcement agencies and communities. A series of incidents involving the SFPD has raised questions about the department's use of force practices, accountability, and oversight of its practices. These incidents include the following:

- In 2015, the SFPD was involved in six fatal officer-involved shootings.[1]
- In a 2010 criminal investigation, a series of racist, sexist, and homophobic text messages was found to have been shared among a group of SFPD officers.[2] The public was not informed about this issue until February 2014.[3]
- In a similar incident made public in early 2016, prosecutors investigating an alleged sexual assault involving an SFPD officer discovered a series of racist and homophobic texts shared among the accused officer, his supervisor, and several additional SFPD officers in 2015.[4]

---

1. City and County of San Francisco Civil Grand Jury, *Into the Open: Opportunities for More Timely and Transparent Investigations of Fatal San Francisco Police Department Officer Involved Shootings* (San Francisco: City and County of San Francisco, 2016), http://civilgrandjury.sfgov.org/2015_2016/2015-16_CGJ_Final_Report_Transparent_Investigations_Fatal_SFPD_Shootings_7_6_2016.pdf.
2. "Government's Opposition to Defendant Furminger's Motion for Bail Pending Appeal," *United States of America* **v.** *Ian Furminger*, No. 3:14-CR-00102-CRB-1 N.D. Calif., filed March 13, 2015, https://assets.documentcloud.org/documents/1688121/sample-of-racist-homophobic-text-messages-from.pdf.
3. Vivian Ho, "Officers in Texting Case Win Key Ruling," San Francisco Chronicle, December 22, 2015, http://www.pressreader.com/usa/san-francisco-chronicle/20151222/281977491581708.
4. Tamara Aparton, "Bigoted Text Messages to Affect 200+ Cases," San Francisco Public Defender, last modified April 26, 2016, http://sfpublicdefender.org/news/2016/04/bigoted-text-messages-to-affect-200-cases.

These events have placed the city in the national spotlight regarding policing practices and opened a public and passionate conversation around the SFPD's community engagement, transparency, and accountability. As the *Final Report of the President's Task Force on 21st Century Policing* notes, trust is the key to the stability of our communities, the integrity of our criminal justice system, and the safe and effective delivery of policing services.

Outreach

In response to community outcry after several officer-involved shootings and other high-profile incidents, San Francisco Mayor Edwin M. Lee and former SFPD Chief of Police Greg Suhr requested assistance from the DOJ to help address the significant community concerns regarding the status of policing in San Francisco. Specifically, they sought an independent assessment of SFPD through the DOJ's COPS Office Collaborative Reform Initiative for Technical Assistance (CRI-TA).

About Collaborative Reform

The DOJ COPS Office established the CRI-TA program in 2011 in response to requests from the law enforcement community for a proactive, nonadversarial, and cost-effective form of technical assistance for agencies with significant law enforcement–related issues. The COPS Office partners with law enforcement executives to assess agency needs and tailor an effective technical assistance approach. In San Francisco, the COPS Office offered CRI-TA, a long-term, holistic strategy to improve trust between police agencies and the communities they serve by providing a means to organizational transformation.[5]

As part of CRI-TA, the SFPD committed to providing the resources and access necessary to facilitate an in-depth look into its policies and practices to help identify areas for improvement and reform particularly as they relate to use of force. The SFPD and the city are to be commended for taking this important step.

Goal and objectives of Collaborative Reform

On April 29, 2016, the COPS Office and the City and County of San Francisco entered into a Memorandum of Agreement for CRI-TA (see appendix G for a copy). The goal of CRI-TA with SFPD is to assess, monitor, and assist the department, in collaboration with the community, in the implementation and sustainment of reforms that increase public trust through improvements in community policing practices, transparency, professionalism, and accountability while taking into account national standards, promising practices, current and emerging research, and community expectations (see appendix H for the full statement).

5. *Collaborative Reform Initiative for Technical Assistance* (Washington, DC: Office of Community Oriented Policing Services, 2016), http://www.cops.usdoj.gov/pdf/technical_assistance.pdf.

The CRI-TA program in San Francisco began with an assessment phase that addressed the following areas:

- Use of force policies and practices
- Policies, practices, and training to address issues of bias in policing
- Community policing strategies and protocols
- Policies and practices regarding complaint and disciplinary processes
- Recruitment, hiring, and personnel practices

Key findings

The COPS Office found a department that is committed to making changes and working with the community. On the other hand, the department has significant deficiencies in the operational systems assessed. Deficiencies were found ranging from outdated use of force policies to inadequate data collection and lack of accountability measures. We also found disparities in traffic stops, post-stop searches, and use of deadly force against African Americans. In addition, there are numerous indicators of implicit and institutionalized bias against minority groups. Focusing on the five objectives, we identified 94 findings and developed 272 associated recommendations. Following are key findings from each chapter.

Use of force

See chapter 2 for the full narrative.

- The majority of deadly use of force incidents by the SFPD involved persons of color (finding 1).
- The SFPD does not adequately investigate officer use of force (finding 18).
- The SFPD does not maintain complete and consistent officer-involved shooting files (finding 19).
- The SFPD has not developed comprehensive formal training specifically related to use of force practices (finding 6).
- Community members' race or ethnicity was not significantly associated with the severity of force used or injury arising from an officer's use of force (finding 21).
- The SFPD does not capture sufficient data on arrest and use of force incidents to support strong scientific analysis (finding 20)

Bias

See chapter 3 for the full narrative.

- The weight of the evidence indicates that African-American drivers were disproportionately stopped compared to their representation in the driving population (finding 30).
- African-American and Hispanic drivers were disproportionately searched and arrested compared to White drivers. In addition, African-American drivers were more likely to be warned and less likely to be ticketed than White drivers (finding 31).
- 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 (finding 32).

- 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 (finding 24).
- The SFPD's failure to fully and adequately address incidents of biased misconduct contributed to a perception of institutional bias in the department (finding 28).
- Allegations of biased policing by community members have not been sustained against an officer in more than three years (finding 29).

Community policing practices

See chapter 4 for the full narrative.

- The SFPD does not collect data around community policing nor measure success within community policing functions and programs (finding 46).
- 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 (finding 43).
- There is a strong perception among community members that the SFPD is not committed to the principles of procedural justice finding 38).

Accountability

See chapter 5 for the full narrative.

- The SFPD is not transparent around officer discipline practices (finding 55).
- Evaluation of employee performance is not an institutionalized practice in the SFPD (finding 79).
- The SFPD's Internal Affairs Division does not have standard operating procedures or templates for investigation reporting (finding 61).
- The SFPD does not analyze trends in complaints, situations that give rise to complaints, or variations between units or peer groups in relation to complaints and misconduct (finding 67).
- The process to update Department General Orders is overly protracted and does not allow the department to respond in a timely manner to emerging policing issues (finding 70).

Recruitment, hiring, and personnel practices

See chapter 6 for the full narrative.

- 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 (finding 81).
- Gender, racial, and ethnic minority recruits were terminated at a higher rate from recruit training as compared to White male recruits (finding 88).
- The SFPD does not have representative diversity within all its ranks in the organization, especially in the supervisory and leadership ranks (finding 90).

The complete list of findings and recommendations is contained in appendix A, starting on page 6.

Conclusions

The COPS Office found a department that is committed to making changes and working with the community. Although there are deficiencies, this report summarizes the full assessment including findings and recommendations that will help the department modernize its policing practices and enhance community trust. As the SFPD continues to address the challenges outlined in the CRI-TA assessment, it will need to take into account issues related to its leadership and vision, communication and accountability efforts, and technological infrastructure. Trust and collaboration between the SFPD and the community are needed to develop co-produced policing, an environment in which police practices and decisions are transparent, appropriate, understood, and supported. In turn, the SFPD must be willing to share decision-making authority over policing priorities and respond to community expectations and needs. This alignment of police and community interests can be served through effective, collaborative application of the principles of community policing.

This report and its recommendations need to be required reading for officers and supervisors of the SFPD. Further, the Police Commission and the Board of Supervisors should require the SFPD to adopt the recommendations contained in this report and to provide quarterly reporting from the chief on progress in meeting the reform goals contained in this assessment.

Findings and recommendations

Finding 1

The majority of deadly use of force incidents by the SFPD involved persons of color.

Nine out of the 11 deadly use of force incidents from May 1, 2013, to May 31, 2016, 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.*

Finding 2

The SFPD has closed only one deadly use of force incident investigation for the time frame 2013 to 2015.

The SFPD has been involved in nine deadly use of force incidents during the time frame of review for this assessment, 2013–2015. All but one remains open, pending a decision by the district attorney on whether the officers' actions were lawful. It is unacceptable for officer-involved shooting investigations to remain open for years.

Recommendation 2.1

The SFPD must work with the City and County of San Francisco to develop a process that provides for timely, transparent, and factual outcomes for officer-involved shooting incidents.

Finding 3

The SFPD and the Police Commission collaboratively worked with community stakeholders to update Department General Order 5.01 – Use of Force policy.

Department General Order 5.01 was last revised in 1995. The draft revision, dated June 22, 2016, reflects policy enhancements that progressive police departments across the country have implemented, including incorporating recommendations from the Final Report of the President's Task Force on 21st Century Policing. However, because of collective bargaining practices, the policy has not yet been implemented by the Police Commission as of the date of this report.

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 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 development.

Finding 4

The Use of Force Log captures insufficient information about use of force incidents.

The SFPD does not have a separate use of force report for personnel to complete after a use of force incident. Rather, the specific articulable facts leading to the force incident are documented in the narrative of a regular incident report form and a paper use of force log, making it difficult to collect accurate and complete data or analyze aggregate use of force data. In addition, it requires staff to manually log the information into the Early Intervention System.

Recommendation 4.1

The SFPD needs to create an electronic use of force reporting system so that data can be captured in real time.

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 4.3

In the interim, the SFPD should implement the use of force report that is under development within the Early Intervention System Unit and require that it be completed for every use of force incident. The assessment team identified this report to be a good start to a robust reporting system for use of force incidents in the SFPD. The SFPD should eliminate the Use of Force Log (SFPD 128 (Rev. 03/16)).

Recommendation 4.4

To facilitate the implementation of recommendation 4.3, a training bulletin describing the form, its purpose, and how to accurately complete it should accompany the form introduction. The bulletin should be implemented within 90 days of the issuance of this report.

Recommendation 4.5

The SFPD should continue the manual entry of use of force data until the electronic use of force report is operational. To ensure consistency and accuracy in the data, this entry should be conducted in a single unit rather than in multiple units.

Recommendation 4.6

The SFPD should audit use of force data on a quarterly basis and hold supervisors accountable for ongoing deficiencies.

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.

Finding 5

The SFPD does not consistently document the types of force used by officers.

Out of a sample of more than 500 reported incidents of use of force, only five had documented the type of use of force on the Use of Force Log. Department Bulletin 14-111 – Documenting Use of Force, drafted April 4, 2014, requires officers to document the type and amount of force used, including the use of impact weapons, with supervisors responsible for ensuring compliance with the policy. However, through 2015, the team found that force data remained incomplete. The overall lack of consistent data collection is indicative of limited oversight of force reporting.

Recommendation 5.1

The SFPD needs to develop and train to a consistent reporting policy for use of force.

Recommendation 5.2

The SFPD needs to hold supervisors and officers accountable for failure to properly document use of force incidents.

Finding 6

The SFPD has not developed comprehensive formal training specifically related to use of force practices.

A number of training issues on emerging operational practices in the SFPD and those highlighted in the Final Report of the President's Task Force of 21st Century Policing, such as de-escalation, have not been adequately addressed.

Recommendation 6.1

The Training and Education Division should adopt and implement a formal Learning Needs Assessment model that identifies and prioritizes training needs and should subsequently design and present them in the most effective and efficient ways possible.

Recommendation 6.2

To support policies mandated through recent Department Bulletins, as well as to ensure implementation of best practices and policies outlined in the Final Report of the President's Task Force of 21st Century Policing, the SFPD's Training and Education Division should prepare training on the following topics at minimum:

- *Enhanced de-escalation*
- *Sanctity of life*
- *Enhanced service-oriented interactions with homeless individuals*
- *Improved dispatch protocols for cases requiring Crisis Intervention Team response*

Recommendation 6.3

SFPD training records should be fully automated and training data easily accessible.

Finding 7

SFPD officers have not been trained on operational field use of the mandated 36-inch baton.

Department Bulletin 16-071, which was published on April 30, 2016, requires all officers to carry a 36-inch baton as part of their daily uniform requirements. The assessment team was concerned that the Training Academy staff did not have advance knowledge of the baton policy change. During the team's visit, Training Academy staff members were drafting training guidelines for use of the 36-inch baton after the policy had already been issued. There must be good communication before and following the publication of orders that affect daily activities or provide for a change in organizational focus. This would allow for smoother implementation and ensure that appropriate training is available, particularly for key orders.

Recommendation 7.1

The SFPD must develop a policy on the use of the 36-inch baton for the use of interacting with individuals with edged weapons. The policy should also dictate the proper handling of the baton, and the policy should dictate when it is appropriate to use a two-hand stance and when a one-hand approach is needed.

Recommendation 7.2

The SFPD must develop training on the use of the 36-inch baton for the use of interacting with individuals with edged weapons. Once developed, the training should be deployed to all officers.

Recommendation 7.3

The SFPD should prohibit the use of the 36-inch baton until all officers are properly trained in its intended field use.

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.

Supervisors are not appropriately tasked in relation to use of force incidents. Supervisors are required to respond to the scene for use of force incidents only when injuries are reported injuries and are not required to document their actions in the incident report. Furthermore, during the review period officers and supervisors continued to inconsistently complete use of force reporting forms.

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 8.2

Supervisors should be held accountable for ensuring accurate and complete entry for all use of force data reporting.

Recommendation 8.3

Supervisors should be required to document their actions regarding the investigation of the use of force incident within the incident report. As recommended in this section (recommendation 3.2), a stand-alone use of force report should be developed and, when completed, should contain a section for supervisory actions relative to the incident and signature.

Finding 9

The SFPD is inconsistent in providing timely notifications to all external oversight partners following an officer-involved shooting.

Members of the SFPD acknowledged that there are occasionally notification delays because of administrative issues and the time it takes to notify required parties of an incident. Regardless of the reason, delayed notification to key partners means that those partners are not present at the earliest stages of an officer-involved shooting investigation. Notifying external oversight partners (including the district attorney and Office of Citizen Complaints [OCC]) promptly allows for timely arrival on the scene and facilitates effective and transparent external oversight of officer-involved shooting investigations.

Recommendation 9.1

The SFPD should work with the Department of Emergency Management to provide it with primary responsibility for timely notification to all stakeholders on the call-out list used immediately after an officer-involved shooting incident.

Recommendation 9.2

Until the Department of Emergency Management protocol is established, when activating the protocols for notification following an officer-involved shooting incident the Operations Center should notify representatives of IAD, the District Attorney's Office, and OCC with no lag time occurring in any of the notifications. The Operations Center log for notifications should be included as part of the investigation report case file to accurately and fully depict notifications.

Recommendation 9.3

All notified responders should be required to notify the Department of Emergency Management of the time of their arrival. This will create a comprehensive permanent record of the time of notifications and responses of the units to the scene.

Recommendation 9.4

The SFPD should explore the option for timely electronic notification to all oversight partners.

Finding 10

There is a lack of coordination and collaboration for responding to and investigating an officer-involved shooting.

The SFPD's investigative protocols are comparable to those followed by other professional major city police departments. However, IAD staff members, along with some of SFPD's partners such as members of the District Attorney's Office and the OCC assigned to respond to such incidents, are not as integrated.

Lack of collaboration and cooperation in investigating officer-involved shooting incidents can undermine procedural justice and transparency for the department. The SFPD needs to develop protocols and memoranda of agreement to ensure the highest level of cooperation and oversight into the investigation of officer-involved shooting incidents. Joint training protocols ensuring all parties are appropriately trained and working to the highest professional standards should become a matter of routine practice. These protocol agreements and practices will become more important as OCC assumes its responsibility to independently investigate SFPD officer-involved shooting incidents. The team will monitor the implementation of the new law during the CRI-TA implementation phase.

Recommendation 10.1

The SFPD should establish a formal protocol to ensure that a representative of the Homicide Detail provides OCC and District Attorney's Office investigators a timely briefing about the facts of the case and to make arrangements for a formal walk-through or gain investigative access to the incident scene as soon as possible. The highest-ranking officer on the scene should be responsible for ensuring compliance with this recommendation.

Recommendation 10.2

The SFPD should work with its accountability partners the OCC and the District Attorney's Office in officer-involved shootings to develop a formal training program in which representatives of the District Attorney's Office, SFPD Homicide Detail, and the OCC engage in regular training regarding best practices for investigating such cases. This training should be developed and implemented within 120 days of the issuance of this report.

Finding 11

The Firearm Discharge Review Board is limited in scope and fails to identify policy, training, or other tactical considerations.

The FDRB is a good practice but has devolved to essentially determining whether the shooting officer's actions were consistent with policy. However, several other layers of authority also conduct this determination. The FDRB is better served following its policy mandate to ensure that the department is continually reviewing its training, policy, and procedures as they relate to officer-involved shooting incidents.

Recommendation 11.1

The SFPD should update the Department General Order 3.10 – Firearm Discharge Review Board to require written evaluation of policy, training, and tactical considerations of discharge incidents, specifically identifying whether the incident was influenced by a failure of policy, training, or tactics and should include recommendations for addressing any issues identified.

Recommendation 11.2

The SFPD should update existing programs and develop training to address policy gaps and lessons learned. The Training and Education Division should work with the FDRB and Homicide Detail to create a presentation to inform department personnel about key issues that contribute for officer discharge incidents and to help mitigate the need for firearm discharge incidents.

Recommendation 11.3

The SFPD should update the DGO to ensure that the FDRB is staffed with a Training and Education Division representative as an advisory member to ensure an appropriate focus on development of responsive training protocols.

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.

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.

Crisis Intervention Team training instructs officers how to effectively manage behavioral crisis situations in the field. Since February 2015, all recruits complete the 40-hour Crisis Intervention Team training before they leave the Academy. As of March 2016, 593 members—27 percent of the department—have received crisis intervention training.

Although there is a policy that supervisors are to be requested at the scene of an incident wherein a member of the public in mental health crisis is armed, more must be in place to address such situations. The team learned that CIT-trained officers are not pre-identified to facilitate their assignment to calls related to persons in mental health crisis. However, given the data issues facing the SFPD, the ability to clearly track and confirm policy adherence for identifying CIT-trained officers remains an issue.

Recommendation 12.1

The SFPD should work with the Department of Emergency Management to ensure sound CIT protocols, namely the following:

- *Ensure that dispatchers are notified at the beginning of each shift which units have CIT-trained officers assigned so they are appropriately dispatched to calls for persons with mental health disabilities.*
- *Develop protocols to ensure that mental health crisis calls for service are answered by intake personnel at the Department of Emergency Management and the information is appropriately relayed to field personnel.*

Recommendation 12.2

The SFPD should ensure an appropriate distribution of CIT-trained personnel across all shifts in all districts.

Recommendation 12.3

Newly promoted supervisors should also receive CIT training as part of their training for their new assignments.

Finding 13

The SFPD engages with the community following an officer-involved shooting incident through a town hall meeting in the community where the event occurred.

The town hall meetings following an officer-involved shooting in the relevant neighborhood is a promising practice.

Recommendation 13.1

The practice of hosting a town hall meeting in the community shortly after the incident should continue with a focus on releasing only known facts.

Finding 14

The SFPD does not have a strategy to engage with the broader community following a fatal officer-involved shooting until its conclusion.

The SFPD does not keep as active an engagement during the investigative process, and consideration should be given to publishing findings once an investigation is completed to ensure community closure.

Recommendation 14.1

The SFPD should develop an ongoing communication strategy for officer-involved shootings.

Recommendation 14.2

The SFPD should ensure that media outreach is immediate and that information conveyed is succinct and accurate.

Recommendation 14.3

The SFPD should use social media as a tool to relay critical and relevant information during the progression of the investigation.

Finding 15

The SFPD does not adequately educate the public and the media on issues related to use of force and officer-involved shootings.

Recommendation 15.1

The SFPD needs to create outreach materials related to educating the public and the media on use of force and officer-involved shooting investigations and protocols. These materials should be disseminated widely through the various community engagement events and district station meetings.

Recommendation 15.2

The SFPD should host town hall presentations to educate the public and the media on use of force and officer-involved shooting investigations and protocols.

Finding 16

Currently, SFPD officers are not authorized to carry electronic control weapons (ECW, i.e., Tasers).

These tools are less-lethal weapons that are meant to help control persons who are acting aggressively. Many police agencies use these tools and report that they have helped reduce injury to officers and community members and lead to fewer officer-involved shootings. Promising practices suggest that the use of ECWs can result in less use of force.

Recommendation 16.1

Working with all key stakeholders and community members, the SFPD and the Police Commission should make an informed decision based on expectations, sentiment, and information from top experts in the country.

Recommendation 16.2

The City and County of San Francisco should strongly consider deploying ECWs.

Finding 17

Currently, the SFPD authorizes personnel to use the carotid restraint technique.

This technique poses a significant risk in the community and is not a routinely adopted force option in many law enforcement agencies. Contemporary policing discussions regarding use of force suggest that police agencies should carefully weigh any perceived benefit of the use of carotid restraint against potential harm. It is challenging to maintain the appropriate leverage and placement in close-encounter struggles, thereby increasing the risk on an unintended, harmful outcome. The department's pending draft order on use of force would eliminate the use of the carotid restraint.

Recommendation 17.1

The SFPD should immediately prohibit the carotid restraint technique as a use of force option.

Finding 18

The SFPD does not adequately investigate officer use of force.

At present, the level of investigations in the SFPD is not sufficient as it relates to officer use of force. There is minimal documentation of witnesses, no separate or summarized interview of witnesses, no routine collection of photographic evidence, and minimal analysis of the event from an evidentiary standpoint. If a supervisor does not respond, then it falls to the officer who used force to complete the investigation, which is unacceptable.

Recommendation 18.1

The SFPD needs to develop a policy for investigation standards and response for all officer use of force.

Recommendation 18.2

The SFPD should create an on-scene checklist for use of force incidents.

Recommendation 18.3

The SFPD needs to develop a protocol for proper development and handling of officer statements.

Finding 19

The SFPD does not maintain complete and consistent officer-involved shooting files.

The SFPD maintains two separate officer-involved shooting files, one with the Homicide Detail and one with IAD. The files are incomplete with no consistent report structure. The team encountered a lack of consistency as to the investigations as well. The fact that some investigative evidence is digital while other evidence is still in paper format may contribute to this inconsistency.

Because Homicide Detail and IAD do not share protocols or standards for investigations of officer-involved shooting incidents, there is likelihood that evidence will not be properly identified or assessed, particularly with dual investigative approaches. Photos, crime scene logs, and video collection were referenced in many reports. However, these items were inventoried elsewhere without copies in the investigative files.

Investigative files did not contain preliminary finding reports or draft reports—even files that were years old. Within Homicide Detail, many files contained an initial summary report but did not document basic records of who was called to attend the scene or who was on the scene.

Recommendation 19.1

The SFPD needs to develop a standard officer-involved shooting protocol within 90 days of the release of this report.

Recommendation 19.2

The SFPD needs to create a template for all officer-involved shooting files. This template should detail report structure and handling of evidence. SFPD should refer to Officer-Involved Shootings: A Guide for Law Enforcement Leaders.

Recommendation 19.3

The SFPD should ensure that all officer-involved shooting investigations are appropriately reviewed by all levels of supervision.

Finding 20

The SFPD does not capture sufficient data on arrest and use of force incidents to support strong scientific analysis.

Because of limitations in the manner in which use of force and arrest data were collected by the SFPD, assessment team members were unable to perform a multivariate frequency analysis, which would have shed light on whether individuals who are members of racial minorities were subjected to force more often than White individuals during arrests.

Recommendation 20.1

The SFPD needs to develop reliable electronic in-custody arrest data. It needs to ensure that these arrest data accurately reflect the incident number from the event, and the number should be cross-referenced on both the booking card and the use of force reporting form.

Recommendation 20.2

The SFPD needs to audit arrest data and use of force data monthly to ensure proper recording of use of force incidents related to arrest incidents. An audit of these data should occur immediately upon publication of this report and monthly thereafter.

Recommendation 20.3

The SFPD needs to advocate for better coordination with the San Francisco Sheriff's Department to ensure that the recording of SFPD arrest data is accurate and corresponds with SFPD incident report and arrest data.

Recommendation 20.4

The SFPD should identify a research partner to further refine its use of force data collection and to explore the data findings of this report to identify appropriate data for measurement and to determine causal factors.

Finding 21

Community members' race or ethnicity was not significantly associated with the severity of force used or injury arising from an officer's use of force.

Recommendation 21.1

The SFPD should continue to collect and analyze use of force data to identify patterns and trends over time consistent with recommendations in finding 20.

Finding 22

When only minority officers were involved in a use of force incident, the severity of force used and the injuries sustained by community members increased.

Recommendation 22.1

The SFPD needs to improve data collection on use of force so that further analysis can be conducted to better understand this finding.

Finding 23

The SFPD allows members to shoot at moving vehicles under certain circumstances pursuant to Department General Order 5.02 – Use of Firearms.

SFPD policy provides for a variety of exceptions that allow officers to shoot at a moving vehicle, which effectively nullifies the general statement that officers are prohibited from discharging their firearm at the operator or occupant of a moving vehicle. The department's pending draft order on use of force allows shooting at vehicles when there is an immediate threat of death or injury by means other than the vehicle.

Recommendation 23.1

The SFPD should immediately implement this provision of the draft policy.

Recommendation 23.2

The FDRB should be tasked with review of all prior officer-involved shooting and discharge incidents in which firearms are discharged at a moving vehicle to

- *evaluate and identify commonalities with recommendations for policy and training as a result of the review;*
- *oversee training and policy development aimed at eliminating the need for such actions;*
- *report to the Police Commission about the outcomes of the review and the actions taken to overcome those situations that contribute to such incidents.*

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.

The advice in the memo (found in appendix K) sent on May 5, 2016, has not been completed by the SFPD. The recommended audit is to ensure organizational integrity regarding the potential for bias in departmental electronic communications.

Recommendation 24.1

The SFPD should immediately implement the bias audit as recommended by the U.S. Department of Justice COPS Office on May 5, 2016 (see appendix K).

Recommendation 24.2

Upon completion of recommendation 24.1, the outcome should be presented to the Police Commission.

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 24.4

The SFPD should implement a policy and a Department General Order stipulating that there is no right to privacy in any use of department-owned equipment or facilities.

Recommendation 24.5

The SFPD should require all members to acknowledge appropriate use standards for electronic communications. This should be a signed acknowledgement, retained in the personnel file of the member, and department personnel should receive an alert reminding them of appropriate use whenever they sign onto SFPD systems.

Recommendation 24.6

The SFPD should report twice a year to the Police Commission on the outcome of these audits, including the number completed, the number and types of devices audited, the findings of the audit, and the personnel outcomes where biased language or other conduct violations are discovered.

Finding 25

The SFPD's General Orders prohibiting biased policing, discrimination, harassment, and retaliation are outdated and do not reflect current practices surrounding these key areas.

Recommendation 25.1

The SFPD should immediately update Department General Order 5.17 – Policy Prohibiting Biased Policing (effective May 4, 2011) and Department General Order 11.07 – Discrimination and Harassment (effective May 6, 2009) to reflect its current initiatives and align with best practices.

Recommendation 25.2

Upon meeting recommendation 25.1, SFPD leadership should release a roll-call video explaining the Department General Orders and reinforcing that a bias-free department is a priority.

Recommendation 25.3

The SFPD should develop and publish a comprehensive strategy to address bias. The strategy should create a framework for the SFPD to

- *be informed by the preliminary action planning that was initiated during the command-level training in Fair and Impartial Policing, which addressed policy, recruitment, and hiring; training; leadership, supervision, and accountability; operations; measurement; and outreach to diverse communities;*
- *update policies prohibiting biased policing to include specific discipline outcomes for failure to follow policy;*
- *continue to expand recruitment and hiring from diverse communities (see recommendation 84.2);*
- *partner with the communities and stakeholders in San Francisco on anti-bias outreach (see recommendation 26.1);*
- *improve data collection and analysis to facilitate greater knowledge and transparency around policing practices in the SFPD;*
- *expand its focus on initiatives relating to anti-bias and fully implement existing programs as part of the overall bias strategy, including the existing Not on My Watch program aimed at engaging officers and the community on addressing issues of bias.*

Recommendation 25.4

As part of its overall strategy, the SFPD should assess its needs for anti-bias programs across the organization, such as gender bias in sexual assault investigations.

Finding 26

There is limited community input on the SFPD's actions regarding its anti-bias policies and practices.

Recommendation 26.1

The Chief's Advisory Forum should be re-invigorated and allow for diverse communities to have meaningful input into bias training, policies, and the SFPD's other anti-bias programming. The chief should ensure that marginalized communities are given a meaningful opportunity to be a part of the Advisory Forum.

Recommendation 26.2

The SFPD should more clearly describe its anti-bias policies and practices for reporting police misconduct and its commitment to ensuring that policing in San Francisco will be bias-free.

Recommendation 26.3

The SFPD should implement an immediate public education campaign on the policies and procedures for reporting misconduct as centered on anti-bias and the initiatives underway.

Recommendation 26.4

The SFPD should work with the Police Commission to convene a community focus group to obtain input on the policies and practices as they are being developed.

Finding 27

The SFPD is not addressing the anti-bias goals set forth through the Fair and Impartial Policing training-the-trainers session.

The SFPD is to be commended for participating in the development of "train the trainers" for Fair and Impartial Policing. However, this training opportunity now needs to be integrated into an organizational approach to developing training delivery across the SFPD. Robust and ongoing training that addresses explicit and implicit biases must be a top priority, not only for the chief of police, the command staff, and the Training and Education Division, but for every member of the department.

Recommendation 27.1

The SFPD should develop a training plan based on a training needs assessment specific to the delivery of anti-bias training as part of an ongoing strategic approach to addressing bias in the SFPD.

Recommendation 27.2

The SFPD should begin anti-bias and cultural competency training of department members immediately and should not await the outcome of the training needs assessment. All officers should complete implicit bias training and cultural competency training, which should include the following topics:

- *Implicit bias awareness and skills for promoting bias-free policing*
- *The definition of cultural competence*
- *Disparate treatment, prejudice, and related terms and their application in law enforcement*
- *The history of various cultures and underrepresented groups in society*
- *Self-assessment of cultural competency and strategies for enhancing one's proficiency in this area*
- *Culturally proficient leadership and law enforcement in communities*

Recommendation 27.3

Training addressing explicit and implicit biases should employ teaching methodologies that implement interactive adult learning concepts rather than straight lecture-based training delivery.

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 27.5

All officers and supervisors should be fully trained on bias and cultural competency within 18 months of the release of this report.

Recommendation 27.6

The SFPD should measure the efficacy of such training through careful data collection and analysis practices, ideally in partnership with an academic researcher.

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.

Finding 28

The SFPD's failure to fully and adequately address incidents of biased misconduct contributed to a perception of institutional bias in the department.

The SFPD responded to the racist, sexist, homophobic, and transphobic texts by a large group of officers by investigating the incident and disciplining the officers directly involved. However, given the nature of the officers' open and flagrant behavior, the SFPD should have taken action to ensure that this was not an

institutionalized problem, including steps to address the behavior at the organizational level. Community perceptions that biased behaviors exist in the SFPD were exacerbated by the explicit bias demonstrated by SFPD officers in the texting scandals and the subsequent failure to take appropriate action.

Recommendation 28.1

The SFPD should investigate complaints of bias transparently and openly and recognize its potential impact upon the larger group of officers who do not hold such views and upon the affected communities of San Francisco. To address these concerns, the department should

- *identify specific roles and responsibilities for supervision of officers regarding biased behavior;*
- *analyze E-585 traffic stop incident report data and enforcement actions with a lens for possible bias or disparate treatment and require supervisors to review these analyses;*
- *identify intervention mechanisms beyond discipline to deal with potentially biased behaviors.*

Recommendation 28.2

The SFPD should provide for open, ongoing command engagement around the issue of bias, both internal and external to the department.

Recommendation 28.3

The SFPD should establish routine, ongoing roll-call training requirements for supervisors on key leadership issues, including their role in promoting fair and impartial policing.

Recommendation 28.4

The SFPD needs to engage in early identification of and intervention in behaviors that are indicative of bias through direct supervision, data review, and observation of officer activity.

Recommendation 28.5

The SFPD needs to train supervisors to recognize behaviors that are indicative of bias and intervene effectively.

Recommendation 28.6

The SFPD must address practices within the organization that reflect explicit biases and intervene with firm, timely disciplinary responses.

Recommendation 28.7

The SFPD needs to encourage all personnel to report biased behavior to the appropriate officials.

Finding 29

Allegations of biased policing by community members have not been sustained against an officer in more than three years.

Recommendation 29.1

The SFPD and OCC should establish shared protocols for investigating bias that do not relying solely on witness statements, given that bias incidents are often reported as one-on-one occurrences.

Recommendation 29.2

The SFPD should ensure that supervisors are trained on bias investigations, including all of the following:

- *How to identify biased police practices when reviewing investigatory stop, arrest, and use of force data*
- *How to respond to a complaint of biased police practices, including conducting a preliminary investigation of the complaint in order to preserve key evidence and potential witnesses*
- *How to evaluate complaints of improper pedestrian stops for potential biased police practices*

Recommendation 29.3

The SFPD should work with the City and County of San Francisco to ensure quality bias investigation training to all oversight investigators.

Recommendation 29.4

SFPD leadership should explore the options for alternate dispute resolutions regarding bias complaints, including mediation.

This is an opportunity to bring police and community members together to foster an improved understanding of police practices and community perceptions. Because bias complaints are rooted in perception and often difficult to sustain, mediation provides for a timelier, more transparent, and potentially more procedurally just resolution for the community member who lodged the complaint.

Finding 30

The weight of the evidence indicates that African-American drivers were disproportionately stopped compared to their representation in the driving population.

Citywide, African-American drivers were 24 percent more likely to be stopped by the police than their estimated representation in the driving population, and they were 9 percent more likely to be stopped given their estimated representation among potential traffic violators.

Recommendation 30.1

The SFPD should develop a plan to conduct further review and analysis of traffic stop data to identify the reasons and potential solutions for the traffic stop data disparities. The plan should be developed within 180 days of the issuance of this report.

Recommendation 30.2

Upon completion of recommendation 30.1, the SFPD should implement the plan to review and analyze traffic stop data to identify the reasons and potential solutions for the traffic stop data disparities.

Recommendation 30.3

The SFPD should provide supervisors with the results of timely data analyses regarding the E-585 traffic stop incident report activity of their officers that allow them to identify and proactively intervene when outlier officers are identified.

Recommendation 30.4

Until the data are electronic, supervisors should be provided with monthly paper reports regarding the E-585 traffic stop incident report activity of officers under their command.

Recommendation 30.5

SFPD supervisors must be trained (pursuant to recommendation 27.1) to review and assess E-585 traffic stop incident report data for disparate outcomes, particularly in relation to peer groups within the unit.

Recommendation 30.6

The SFPD should implement the data collection recommendations regarding improving traffic stop data provided in appendix F. The timing of the implementation needs to be identified in the technology plan.

Finding 31

African-American and Hispanic drivers were disproportionately searched and arrested compared to White drivers. In addition, African-American drivers were more likely to be warned and less likely to be ticketed than White drivers.

The racial disparity in traffic stops and post-stop outcomes appears to be large and statistically significant.

Recommendation 31.1

The SFPD needs to analyze the data and look for trends and patterns over time to reduce the racial and ethnic disparities in post-stop outcomes.

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 32.1

As stated in finding 31, the SFPD should complete recommendations 31.1.

Recommendation 32.2

The SFPD needs better training on the Fourth Amendment and applicable state laws on search and seizure.

Finding 33

The current E-585 traffic stop incident report does not collect sufficient or appropriate information to allow for a robust analysis of possible bias by SFPD officers.

Recommendation 33.1

The SFPD should implement the data collection recommendations in appendix F to allow for better information and analysis of stop data.

Finding 34

The SFPD does not routinely collect or analyze data on stops involving pedestrian and nonmotorized conveyances.

Recommendation 34.1

The SFPD should prioritize the collection, analysis, and reporting of all nonconsensual stop data, including pedestrian and nonmotorized conveyances.

Recommendation 34.2

The SFPD should mandate the collection of stop report data on any stop or detention of a pedestrian or person riding a nonmotorized conveyance, such as a bicycle, skateboard, or scooter. This should begin immediately and not wait until AB 953 requires such action in April 2019.

Recommendation 34.3

The SFPD should consider expanding the functionality of the E-585 traffic stop incident report data collection system to include data collection for all pedestrian and nonmotorized conveyances.

Finding 35

The SFPD does not have sufficient systems, tools, or resources needed to integrate and develop the appropriate data required to support a modern, professional police department.

Many of the department's technology and information sharing systems are outdated and not integrated and do not support ready access for analysis to inform management decisions. Progressive police supervision requires timely access to accurate information regarding officer activity, traffic and pedestrian stops, use of force, and resident complaints to help analyze officers' actions and trends. The SFPD must conduct an assessment across the whole organization and determine how to prioritize the implementation of IT solutions for key management and operational practices.

Recommendation 35.1

The SFPD should adopt new policies and procedures for collecting traffic and pedestrian stop data, public complaints, and enforcement actions. Information for these events should be recorded accurately.

Recommendation 35.2

The SFPD should analyze its existing technology capacity and develop a strategic plan for how data are identified, collected, and used to advance sound management practices.

Recommendation 35.3

SFPD leadership should make a concerted effort to focus on data collection and to create systems and analysis protocols that will inform supervisors where incidents of potential bias or disparate treatment occur or where patterns in officer behavior exist that warrant further examination or monitoring.

Recommendation 35.4

The SFPD should continue participating in the White House Police Data Initiative and seek to expand its data collection and reporting consistent with those recommendations and the goals of the initiative.

Finding 36

The SFPD does not have an organizational performance approach to evaluating the impact of policies, practices, and procedures aimed at reducing bias within the department.

Recommendation 36.1

The SFPD should develop an audit practice to evaluate the impact on the department of the implementation of new training programs.

Recommendation 36.2

The SFPD should incorporate ongoing review and audit of anti-bias programs into a quarterly report that includes promising practices and lessons learned.

Recommendation 36.3

The SFPD should review all of its policies, procedures, manuals, training curricula, forms, and other materials to eliminate the use of archaic or biased language. For example, the SFPD should review the use of the word "citizen" in policies and forms, such as the Citizen Complaint Form (SFPD/OCC 293). This assessment should be completed within 120 days of the issuance of this report.

Finding 37

The policy for the use of Field Interview cards fails to outline sufficient guidance on when they should be completed.

Recommendation 37.1

The SFPD should establish policy that specifically governs when and how Field Interview cards are completed. This should be accomplished within 180 days of the issuance of this report.

Recommendation 37.2

The SFPD needs to reassess its use, storage, and collection of Field Interview cards to ensure data retention and collection are in accord with legal requirements. Annual audit of Field Interview cards should be part of the data retention practices.

Finding 38

There is a strong perception among community members that the SFPD is not committed to the principles of procedural justice.

The assessment team heard from community members who expressed concerns over being treated unfairly, not being given a voice, or not being able to participate in policing decisions that affect the community.

Recommendation 38.1

The SFPD needs to expand its outreach to its communities in a manner designed to demonstrate its commitment to procedural justice.

Recommendation 38.2

SFPD leadership should take an active and direct role in community engagement at the neighborhood level.

Recommendation 38.3

The SFPD should engage community members in the implementation of the recommendations in this report.

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 39.2

SFPD leadership should lead, mentor, and champion a community-based strategic planning initiative.

Recommendation 39.3

The SFPD should establish a Strategic Planning Steering Committee composed of representatives from the community and various sections of the department within 90 days of the issuance of this report. This committee should collaborate to develop policies and strategies for policing communities and neighborhoods disproportionately affected by crime and for deploying resources that aim to reduce crime by improving relationships and increasing community engagement.

Recommendation 39.4

A training needs analysis must be conducted to support the training requirements recommended in this assessment. The SFPD must conduct an analysis of the needs across the organization, identify the benchmark for training, and develop a prioritized training plan based on the needs analysis. This will require solid support from the Office of the Chief of Police and the command staff if it is to succeed in strengthening the content, quality, and timeliness of the department's training. This should be completed within nine months of the issuance of this report.

Recommendation 39.5

A technology needs analysis must be conducted on how to address the technology gaps identified in this assessment. Organizational needs should be identified, and a structured plan supported by budget forecasting should be in place to address the development of the IT enterprise for the SFPD. Existing systems should be integrated to ensure full value of the data already in place in the SFPD and that IT systems and practices remain up to date.

The SFPD must analyze and expound its information technology capabilities that provide the right management information to drive key decisions on officer misconduct and overall employee performance.

Recommendation 39.6

The SFPD must conduct a gap analysis comparing the current state of the department's information gathering, analyzing, and sharing assets and capabilities with the established modern best practices. This should be completed within six months of the issuance of this report.

Recommendation 39.7

The SFPD must conduct a portfolio management assessment to identify opportunities for consolidating platform and product offerings, providing enterprise solutions across the organization instead of silos or one-off product sets. This should be completed within six months of the issuance of this report.

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 39.9

The SFPD must establish clear life-cycle management policies and procedures for enterprise application maintenance, support, and replacement strategies for sustaining improved data collection, analysis, and dissemination technologies. This should be completed within 12 months of the issuance of this report.

Finding 40

The SFPD does not formalize community engagement in support of community policing practices.

The SFPD does not have a comprehensive, strategic community policing plan that focuses priorities, resources, programs, and activities for the department. Community policing involves partnerships, problem solving, and organizational transformation. In order to be a true community policing department, the SFPD needs to ensure the entire department is following the tenets of community policing systematically and strategically.

The SFPD needs to bring the community to the table in order to establish comprehensive community policing resources, programs, and activities.

Recommendation 40.1

As part of the Strategic Plan (recommendation 39.1), the SFPD should develop a strategic community policing plan that identifies goals, objectives, and measurable outcomes for all units.

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 40.3

As part of its plan, the SFPD should consider the role of the beat and its place within its priorities. Prioritizing beat-aligned policing would require some realignment of dispatch priorities and directed patrol.

Recommendation 40.4

The SFPD should evaluate whether implementation of foot patrol and bicycle patrol would bridge the trust gap and effectively solve crime problems in San Francisco's communities.

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 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 40.7

The SFPD should develop strategic partnerships on key community issues such as homelessness and organizational transparency to work in a collaborative environment to problem solve and develop co-produced plans to address the issues.

Recommendation 40.8

The SFPD should publish and post its annual review of progress toward the community policing goals and objectives.

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.

These overarching directives do not sufficiently reflect the vision, plan, or goals of the SFPD with regard to community policing. They need to be updated and maintained as living documents that guide the community policing activities of the organization.

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 41.2

The SFPD should work with the Police Commission to draft a new community policing order that reflects the priorities, goals, and actions of the department.

Finding 42

The SFPD conducts community policing in silos but does not ensure community policing is systematically occurring across the department.

Without an overall strategy, the SFPD's community policing activities represent only a collection of programs aimed at engaging with the community. Some SFPD district captains are creatively engaging the community and identifying promising practices; however, by not systematically identifying these practices they are working in silos. Every unit in the SFPD must have a community policing plan that is measurable and also coordinates with, supports, and is accountable to the organizational strategic plan. Ensuring that the whole of the organization is actively engaged with the community supports community policing goals, develops a culture that is consistent with true police-community partnerships, and allows the department to more effectively respond to community needs.

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 42.2

The SFPD should create an overall structure to manage the department's approach to community policing driven by a committee of senior leaders and district captains.

Recommendation 42.3

The SFPD should recognize those district captains engaged in best practices and use them as peer trainers for other captains.

Recommendation 42.4

The SFPD should provide information technology support to districts to help develop newsletters that are easily populated and more professional in appearance. Creating a uniform newsletter architecture and consistent format that allows for easy data and content uploading would create efficiencies and help develop a greater sense of community.

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.

The SFPD partners on a variety of projects and is to be commended. As the department expands its work with the local communities, it must continue to ensure cultural sensitivity to projects it is implementing and when seeking to partner with additional members of the community. Public perception and community customs need to be at the forefront of the decision process.

Recommendation 43.1

The SFPD should continue to actively support the programs aimed at community engagement, including Coffee with a Cop, the San Francisco Police Activities League, San Francisco Safety Awareness for Everyone, and The Garden Project.

Recommendation 43.2

The SFPD should expand its partnership with and further support neighborhood organizations that work to provide art, sports, educational, and leadership development opportunities for young people in the community.

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 43.4

The SFPD needs to reach out to members of activist groups and those groups who are not fully supportive of the department to seek to develop areas of mutual concern and work towards trust building and resolution of shared issues.

Finding 44

The Professional Standards and Principled Policing Bureau's mission, role, and responsibilities as they relate to community policing are not clearly defined or implemented.

In the absence of structured goals and objectives, the Professional Standards and Principled Policing Bureau has little influence in guiding the community policing-related activities.

Recommendation 44.1

The chief of police should give the deputy chief of Professional Standards and Principled Policing Bureau the responsibility of advancing community policing throughout the entire department and the communities of San Francisco.

Recommendation 44.2

The chief of police should empower the deputy chief of the Professional Standards and Principled Policing Bureau to create a strategy and plan to implement, with urgency, the Final Report of the President's Task Force on 21st Century Task Force recommendations contained in Pillar Four and the recommendations in the CRI-TA assessment.

Recommendation 44.3

The SFPD should adequately resource the Professional Standards and Principled Policing Bureau to reflect the diversity of the community it serves and the officers of the SFPD in order to effectively coordinate community policing efforts throughout the city.

Recommendation 44.4

The SFPD, through the Principle Policing and Professional Standards Bureau, should engage and support all units by facilitating quarterly meetings among supervisors and managers to discuss cross-organizational goals and community policing plans and outcomes. These meetings should be supported by routine electronic engagement through a shared platform for sharing information.

Finding 45

The SFPD is not focused on community policing efforts across the entire department.

Recommendation 45.1

The SFPD should expand community policing programs throughout the entire agency and ensure each unit has a written strategic plan embracing community policing and measurable goals and progress, regardless of the unit's specialty.

Recommendation 45.2

SFPD leadership should provide short video messages on the importance of the entire agency understanding and embracing community policing.

Recommendation 45.3

The SFPD should consider mandating annual community policing training to the entire agency.

Finding 46

The SFPD does not collect data around community policing nor measure success within community policing functions and programs.

Recommendation 46.1

The SFPD needs to prioritize data collection practices measuring community policing and should consider reinstituting Form 509 or other such instruments to allow for consistency in data collection and reporting.

Recommendation 46.2

The SFPD should regularly assess existing community engagement programs to ensure effectiveness in a framework predicated upon sound measurement practices. Assessments should include input from participants and trusted community partners.

Recommendation 46.3

The SFPD should establish formal mechanisms to measure and support information sharing and the development of shared good practice among SFPD members, particularly district captains.

Recommendation 46.4

The SFPD should create a feedback mechanism for community engagement events to determine efficacy, replicability, and depth of relationship with community partners. A community survey could be one feedback mechanism.

Recommendation 46.5

The SFPD should publish and post any community survey results.

Finding 47

The SFPD does not consistently seek out feedback or engage in ongoing communication with the community relative to its policing practices and how the community perceives its services.

The Bay Area is home to several academic institutions, and a partnership arrangement should be considered not only for the community survey but also as a means to measure overall progress of the department's reform efforts. Such an arrangement would allow for ongoing transparent evaluation of the reforms that have been publicly promised to the residents of San Francisco.

Recommendation 47.1

The department should conduct periodic surveys to measure whether the SFPD is providing fair and impartial treatment to all residents and to identify gaps in service (see recommendation 46.5).

Recommendation 47.2

The department should create easy points of access for community feedback and input, such as providing "community feedback" or "talk to your captain" links on its website and social media pages.

Recommendation 47.3

The role of the Director of Community Engagement should be aligned with organizational communication and outreach to enhance overall messaging and community awareness of the SFPD's community policing initiatives and ongoing programs.

Finding 48

The SFPD needs to develop a robust, broad-based community forum for input on policing priorities across all communities.

Recommendation 48.1

The chief's community forum groups—African American, Arab American, Asian Pacific Islander, Business, Hispanic, Interfaith, LGBT, Young Adults, Youth, and Youth Providers—need to be re-established and structured to engage in problem solving and action regarding issues affecting the groups they represent.

Recommendation 48.2

The department needs to develop an annual reporting and measurement process of the issues raised at the forum and the progress made by the group in resolving them.

Finding 49

Many in the SFPD lack an understanding of current and emerging community policing practices such as procedural justice.

Recommendation 49.1

The SFPD should ensure that all department personnel, including civilians, undergo training in community policing as well as customer service and engagement.

Recommendation 49.2

Consideration should be given to using Field Training Officers to help develop and deliver training in the field regarding key community policing concepts as a way to augment and expand the training currently provided at the Training Academy.

Recommendation 49.3

The SFPD's training needs to expand beyond traditional community policing and include the foundation and concepts of procedural justice as related concepts.

Finding 50

The SFPD does not require agency personnel to read the Final Report of the President's Task Force on 21st Century Policing.

Recommendation 50.1

The SFPD should require all agency personnel to read the Final Report of the President's Task Force on 21st Century Policing.

Recommendation 50.2

The SFPD should encourage supervisors and captains to continue conversations on the Final Report of the President's Task Force on 21st Century Policing through roll calls, in-service training, and community meetings.

Finding 51

Training curricula do not address the complex emerging community issues in the current law enforcement environment.

Recommendation 51.1

The SFPD should provide procedural justice and explicit and implicit bias training to all department personnel including civilian staff. This training should become a permanent part of the Academy's curriculum and should be reviewed with each officer during the department's annual officer training sessions.

Recommendation 51.2

The SFPD should engage in peer-to-peer training exchanges for exposure to other departments' training curricula to identify areas for potential improvement. Areas of focus should include de-escalation training, use of force training with a focus on the sanctity of life, impartial policing, and procedural justice.

Finding 52

The SFPD has not fully engaged with all institutional and community partners to coordinate service provision to the homeless community.

Significant amounts of SFPD resources are directed at responding to issues involving the homeless community. The SFPD needs to assess and ensure that these resources are being used to their greatest value.

Recommendation 52.1

The SFPD should review and strategically align resources to support the Homeless Outreach Teams, which are currently providing service to the homeless community.

Recommendation 52.2

The SFPD should engage with the City and County of San Francisco to conduct joint strategic planning with all of its appropriate federal, state, and local partners to clearly define roles, responsibilities, and goals in continuing to address the issue of homelessness and ensure a more consistent and coordinated response to the needs of this growing segment of the city's population.

Recommendation 52.3

The SFPD should engage in data collection and analysis to measure the effectiveness of strategies aimed at all community policing issues, particularly its response to the homeless community. The analysis should be part of an ongoing review and publication and reflect the commitment to greater transparency and community engagement.

Finding 53

The SFPD does not incorporate the tenets of community policing in its evaluation of employee performance.

The President's Task Force on 21st Century Policing has recommended that law enforcement culture adopt a "guardian" mindset, which means strengthening the department's resolve to engage proper exercise of discretion and authority.

Recommendation 53.1

Performance evaluations should include officers' behaviors and efforts to meet the SFPD's community policing goals of community engagement, positive police-community interaction, and problem resolution. Establishing consistent performance evaluations is covered under recommendation 79.1.

Finding 54

The SFPD does not have multi-levels of awards and recognition that reward organizational values and goals, such as community engagement and recognition, discretion under duress, and strategic problem solving.

Rewarding behaviors and actions that reflect the values of a guardian mindset is one way to institutionalize the department's community policing goals.

Recommendation 54.1

The SFPD should support and recognize proper exercise of power and authority with good community outcomes in addition to traditionally recognized acts of bravery.

Recommendation 54.2

The SFPD should implement department-wide recognition for an officer of the month as one way to begin to advance a culture of guardianship and reward good community policing practices.

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 55.1

The SFPD should expand its current reporting process on complaints, discipline, and officer-involved shootings to identify ways to create better transparency for the community regarding officer 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.

Finding 56

The SFPD does not engage in community outreach and information regarding the discipline process and rights of the community.

The absence of information and education about the complaint system and its outcome contributes to the negative perceptions of the SFPD by residents.

Recommendation 56.1

The SFPD should work with the OCC and Police Commission to minimize obstacles to transparency as allowed by law to improve communications to complainants and the public regarding investigation status, timeliness, disposition, and outcome.

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 56.3

The SFPD should work with the OCC to facilitate the same actions and outreach to the community as best suits the independence of the OCC.

Recommendation 56.4

The SFPD should ensure that the OCC public complaint informational materials are readily available in the community and in particular prominently displayed in district stations for access by the public. These materials should be designed to educate the public about confidentiality limitations on sharing investigative information to inform residents of the type of feedback they may reasonably expect, and they should be provided in multiple languages.

Recommendation 56.5

The SFPD should work with the OCC and the Police Commission to conduct community workshops on the complaint process and the roles and responsibilities of each agency relative to the overall process within nine months of the issuance of this report.

Recommendation 56.6

The SFPD should encourage the OCC and IAD to identify obstacles that interfere with optimal complaints investigations and accountability, with a goal of implementing changes to better support their intended missions.

Finding 57

The SFPD does not provide leadership in its role with respect to complaints against SFPD personnel.

Promising practices emphasize the role of effective investigation of complaints in building community trust. Procedural justice informs us that members of the public are more likely to trust law enforcement agencies when they believe their issues are handled with dignity and respect.

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 57.2

The SFPD should institutionalize the process of explaining and assisting community members who file complaints against officers.

Recommendation 57.3

The SFPD should ensure that all personnel are trained and educated on the public complaint process and the location for the appropriate forms.

Recommendation 57.4

The SFPD should develop "next steps" and "know your rights" handouts for complainants who file complaints at department facilities.

Finding 58

The SFPD does not have a tracking system for complaints received at a district station.

Recommendation 58.1

The SFPD should establish a record system for ensuring that complaints received at a district station are forwarded properly and in a timely matter to the OCC. E-mail and fax should be considered for ensuring delivery and creating a record.

Finding 59

SFPD Internal Affairs Administrative Investigations and Internal Affairs Criminal Investigations are not effectively collaborating.

In meeting with members of IAD, the team learned that there was a lack of clarity as to roles within IA Criminal and IA Administrative, and unit members often felt that they did not have sufficient direction. Members of IAD acknowledged that they seldom meet to discuss investigations or common issues such as how to develop an effective database for case management and archival purposes. They also referenced a lack of administrative and technical resources, especially data systems, as impediments to the effective and efficient performance of their duties. However, absent protocols field assignments are subject to variance, and therefore so is the overall focus and quality of the investigative process.

Recommendation 59.1

Members, including investigators, of the IA Administrative Unit and IA Criminal Investigations Unit should meet regularly to discuss processes, practices, and the flow of assigned cases to ensure that administrative violations are timely and properly addressed.

Finding 60

Internal Affairs case tracking is insufficient to ensure the timely progression of investigations and achieving key deadlines.

Recommendation 60.1

The SFPD and OCC should jointly develop a case tracking system with sufficient security protections to assure independence that would identify each open investigation, where it is assigned, and the date the case expires for the purposes of compliance with California Government Code Section 3304(d)1, which requires the completion of an administrative investigation into misconduct within one year of the agency discovery.

Recommendation 60.2

The SFPD and OCC should establish an investigative protocol within 120 days of the issuance of this report that allocates specific time parameters for accomplishing investigative responsibilities and transfer of cases if criminal allegations are made against SFPD officers.

Recommendation 60.3

Supervisors should be held accountable for ensuring timely transfer of cases to SFPD Internal Affairs Administrative Investigations from SFPD Internal Affairs Criminal investigations when appropriate.

Finding 61

The SFPD's Internal Affairs Division does not have standard operating procedures or templates for investigation reporting.

By not having specific protocols and templates, miscommunication is occurring with the investigations.

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 61.2

The SFPD must establish clear responsibilities and timelines for the progression of administrative investigations, and supervisors should be held to account for ensuring compliance.

Finding 62

Files stored with the SFPD's Internal Affairs Division are secured, but compelled statements are not isolated.

During the file reviews, the assessment team did not find any compelled statements isolated.

Recommendation 62.1

The SFPD needs to establish standard operating procedures for maintaining file separation and containment of criminal investigations. This is critical to ensuring that officers' rights are protected and that criminal investigations can be fully investigated.

Finding 63

The SFPD does not fully support members performing internal affairs functions.

SFPD officers identified a department culture that is hostile and in some cases detrimental to the accountability role of the IAD, thereby limiting the effectiveness of the process.

At present, the culture of the SFPD is not directed toward building an environment of accountability. Policies are disregarded, and investigations are not robust. The lack of coordination between institutional partners for investigations is a real challenge to building trust within the community. Even IAD members perceive a lack of support from the department as a whole. According to these members, not all SFPD line officers and supervisors support the need for internal investigations in ensuring transparency and building effective community relationships. IAD personnel reported arriving at a district to interview an officer and encountering district personnel, including supervisors, who would protect or conceal the officer from the investigators. From the perspective of leadership and management communications, all SFPD members need to feel valued and supported by the organization. Internal Affairs should be seen as a rewarding assignment, one that is valued by the organization.

Recommendation 63.1

The SFPD should clearly define the authority of IAD and reinforce that cooperation and collaboration with IAD is mandatory.

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 63.3

SFPD leadership should demonstrate its support of the IAD's role and responsibility within the department and provide recognition and support for good investigative practices.

Finding 64

The SFPD does not routinely collaborate with the Office of Citizen Complaints.

The transparency of the complaint and disciplinary process is negatively affected by the working relationship between SFPD IAD and OCC. The lack of engagement undermines the effectiveness of both in fulfilling their respective roles and responsibilities. Issues with respect to information sharing between the two entities, timeliness of complaint investigations, and bases for recommending progressive discipline potentially impede the investigative and adjudication processes, potentially eroding the overall integrity of the public complaint resource.

Recommendation 64.1

The SFPD should convene a joint review process within 90 days of the issuance of this report, co-chaired by OCC and SFPD senior staff, to evaluate existing complaint and disciplinary processes, policies, and liaison relationships to enhance trust and legitimacy around these issues.

Recommendation 64.2

The SFPD should immediately accept OCC's recommendation, as reported in the First Quarter 2016 Sparks' Report, to convene quarterly meetings between OCC staff and SFPD staff.

Recommendation 64.3

The SFPD should seek to improve interagency communications and identify ways of improving collaboration on investigative practices to ensure timely conclusion of investigations, shared information on prior complaints and finding of misconduct, and appropriate entry of discipline, designed to improve the overall discipline system that holds officers to account.

Recommendation 64.4

The SFPD should work with OCC to develop standards within 120 days of the issuance of this report regarding timeliness of complaint investigations, and consistency of investigative findings and practices to ensure progressive discipline is appropriately recommended.

Recommendation 64.5

The SFPD should engage with OCC to ensure that the classification for complaints and their findings are reported consistently between the two agencies to ensure better transparency.

Finding 65

The SFPD does not sufficiently analyze Office of Citizen Complaints reports and analyses of its complaints, investigations, and case dispositions.

This information is shared with the SFPD and largely available publicly on the OCC website. However, the SFPD rarely uses complaint information or aggregated data to inform change management priorities in areas such as professional conduct, community and police relations, training, and policy.

Recommendation 65.1

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.

Recommendation 65.2

The SFPD should raise district captains' awareness of this information by requiring IAD to present a trends analysis report of OCC case activity, emerging issues, and concerns at CompStat meetings every quarter.

Finding 66

The SFPD is not required to take action on the recommendations put forth in the Office of Citizen Complaints Sparks Report.

OCC provides the Sparks Report quarterly to the Police Commission. The Sparks Report provides recommendations on policy and revisions.

Recommendation 66.1

The SFPD should meet with OCC on a quarterly basis following the release of the Sparks Report to discuss the recommendations.

Recommendation 66.2

The SFPD should make it mandatory for the Professional Standards and Principled Policing Bureau to review the Sparks Report and direct action where appropriate.

Recommendation 66.3

The SFPD should provide twice-yearly reports to the Police Commission regarding actions resulting from the Sparks Report, including whether the OCC recommendation is supported and a timeline for implementation or correction to existing practice and policy.

Finding 67

The SFPD does not analyze trends in complaints, situations that give rise to complaints, or variations between units or peer groups in relation to complaints and misconduct.

In part, this is because the SFPD does not have appropriate data systems to allow for data-led management and policing decisions.

Recommendation 67.1

The SFPD must work to develop practices that measure, analyze, and assess trends in public complaints and employee misconduct.

Recommendation 67.2

Supervisors should be provided with quarterly reports that integrate individual actions, as is currently reported by the Early Intervention Systems Unit, with aggregated information that provides complaint and misconduct data trends for the watch, district, and city.

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 68.2

Supervisors and officers who fail to properly collect and enter information must be held accountable through discipline. Absent proper collection of data, little to no analysis can occur.

Recommendation 68.3

The SFPD should increase transparency by collecting and providing data, policies, and procedures to the public in multiple languages relevant to the local community through official SFPD website and municipal open data portals.

Finding 69

The SFPD does not consistently apply the principles of procedural justice.

Recommendation 69.1

SFPD leadership should examine opportunities to incorporate procedural justice into the internal discipline process, placing additional importance on values adherence rather than adherence to rules. The Police Commission, OCC, IAD, and POA leadership should be partners in this process.

Albeit conclusions are drawn from a small sample, the assessment team is concerned that in review of some investigations, the officers who received discipline were primarily ethnic or racial minorities or women. In an organization where very few officers received suspensions for misconduct, this discrepancy stood out.

Recommendation 69.2

The SFPD should task a committee to review internal discipline on a quarterly basis to assure the fairness and impartiality of the process overall and particularly to ensure that there is not bias in determination and application of discipline. This analysis should be multi-levelled to include aggregate data, trend analysis, and outcome impact on officer demographics including prior discipline and adherence to the discipline matrix.

Recommendation 69.3

The SFPD should report annually to the Police Commission the analysis of discipline including officer demographics and prior discipline histories.

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.

As a result, many of the Department General Orders are from the mid-1990s and do not fully reflect current policing practices.

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 70.2

The SFPD should commit to updating all Department General Orders in alignment with current laws and statutes, community expectations, and national best practices every three years.

Recommendation 70.3

Prior to promulgation of policies and procedures, the SFPD should ensure that comments are sought from members and units most affected by any practice, policy, or procedure during the initial stages of development.

Recommendation 70.4

Input and review from external stakeholders must be completed before implementation of the practice, policy, or procedure.

Finding 71

The SFPD does not have an effective process for the development and distribution of Department General Orders and Bulletins.

Clearly articulated policies are needed to help SFPD personnel make the right decisions.

Recommendation 71.1

The SFPD needs to work with the Police Commission to create a process to make timely and necessary updates to key policies.

Recommendation 71.2

The SFPD should develop a general order review matrix predicated upon area of risk, operational need, and public concern to allow for timely update and review of prioritized orders.

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 72.2

All Department Class A Bulletins and any Department Bulletin that modifies an existing Department General Order should be posted on the SFPD's website.

Recommendation 72.3

The SFPD should limit the use of Department Bulletins to short-term direction and eliminate the authority to continue a Department Bulletin after two years.

Finding 73

The SFPD does not have an effective mechanism for determining whether an officer has accepted a policy and therefore could be held to account for its provisions.

Recommendation 73.1

The SFPD should develop a mechanism by which to track when a Department General Order or Department Bulletin has been accessed and acknowledged by a SFPD member.

Recommendation 73.2

Once a mechanism is established, the SFPD should create a protocol for notification, noncompliance, and accountability.

Finding 74

The SFPD does not provide sufficient training, supervision support, and guidance when releasing new Department Bulletins.

Training is critical, particularly when associated with risk issues such as use of force, bias, stop and seizure. It was rare that any training accompanied new policies outlined in Department Bulletins, as evidenced in the lack of training development before the introduction of the mandatory requirement to carry the 36-inch baton.

Recommendation 74.1

The SFPD should conduct a thorough and structured approach when creating new policies and procedures via Department Bulletins.

Recommendation 74.2

The SFPD should ensure that Bulletins are accompanied by appropriate training, supervision, and consistent reinforcement of the intended purpose of the policies.

Finding 75

The SFPD does not devote sufficient administrative or command-level resources to the process of creating, implementing, maintaining, and updating Department General Orders and Bulletins.

The team found that Department Bulletins updating provisions within Department General Orders were repeatedly renewed to meet the two year sunset, often without receiving any substantive updates and in place of addressing the issue within the appropriate Department General Order.

Recommendation 75.1

The SFPD should task the Principled Policing and Professional Standards Bureau with overall responsibility for development, maintenance, training, and implementation planning for Department General Orders.

Recommendation 75.2

The Written Directives Unit should be tasked to work with subject matter experts from OCC and the Police Commission to ensure policies are adopted in a timely manner and appropriately updated.

Recommendation 75.3

The Written Directives Unit should be sufficiently staffed with personnel and resources to enable the unit to function as the project managers for Department General Orders at the direction of the Police Commission.

Finding 76

Although the SFPD internally provides Department General Orders and Department Bulletins that are electronically available, the documents are not easily accessible.

Absent an easily cross-referenced system, particularly one where Department Bulletins can supersede a Department General Order, policy failure or incorrect action can occur.

Recommendation 76.1

Department General Orders and Department Bulletins should be stored in a searchable digital central repository for ease of access by officers and for administrative purposes.

Recommendation 76.2

The SFPD should provide department members access to an online electronic system for Department General Orders and Department Bulletins to provide timely updates, cross-referencing, and reporting and monitoring capabilities for managers.

Finding 77

The SFPD does not conduct routine, ongoing organizational audits, even where such practices are established in policy.

Recommendation 77.1

The SFPD should prioritize auditing as a means to ensure organizational accountability and risk management and develop mechanisms to support such practices.

Recommendation 77.2

The SFPD should develop an auditing plan and schedule for both routine and risk audits within 90 days of issuance of this report. Staffing, resources, and training need to be allocated to the process to ensure an active and robust auditing schedule.

Finding 78

The SFPD does not engage in any outside evaluations of its practices, data, or reporting.

Recommendation 78.1

The SFPD should consider partnering with local academic institutions to evaluate its reform program, particularly as it seeks to implement the recommendations in this report.

Finding 79

Evaluation of employee performance is not an institutionalized practice in the SFPD.

SFPD personnel interviewed did not recall having or conducting a performance evaluation within the department.

Recommendation 79.1

The SFPD should adopt a policy and implement the practice of completing regular performance evaluations of all department employees tailored to goals and objectives, job functions, and desired behavior and performance indicators.

Recommendation 79.2

SFPD leadership needs to create a system to ensure that all personnel are being evaluated at least twice a year.

Recommendation 79.3

The SFPD should use performance evaluations as an evaluation factor in promotions.

Finding 80

The SFPD does not have internal protocols for collaboration with regard to criminal investigations conducted by the district attorney or the United States Attorney's Office for the Northern District of California.

Police misconduct uncovered during any type of covert investigation should be reported pursuant to established protocols and protect the integrity of the investigating officers. In situations with shared areas of jurisdiction or responsibility for officer conduct, there should be protocols for roles and responsibilities for all partners.

Recommendation 80.1

The SFPD should create a policy governing the reporting of criminal activity and administrative misconduct uncovered during any type of covert investigation. Such policies will prepare the department for complex legal situations with multijurisdictional responsibilities for either criminal or administrative investigations into officer conduct.

Recommendation 80.2

Clear communication protocols, responsibilities, and roles need to be established among the key partners responsible for investigations into criminal conduct and address administrative misconduct by officers.

Recommendation 80.3

The SFPD should develop clear and defined policies and protocols to address reporting and confidentiality requirements for officers investigating criminal activity and administrative misconduct of other police officers uncovered during any type of investigation.

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.

A lack of community engagement perpetuates this perception over hiring requirements.

Recommendation 81.1

The SFPD should clearly articulate its hiring and background standards as a matter of building community trust and ensuring applicants are prepared.

Recommendation 81.2

The SFPD should publish annual statistics on the demographics of applicants for each stage of the hiring process.

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.*

Finding 82

The SFPD does not fully engage its applicants throughout the hiring process.

Given the lengthy and intensive process for hiring, the SFPD needs to develop a program for engaging quality candidates early on and keeping them interested in and involved with the department.

Recommendation 82.1

The SFPD should develop an active social media and website presence to entice qualified candidates and keep them engaged throughout the application process.

Recommendation 82.2

The SFPD should consider creating information boards and "applicant only" websites and providing ongoing updates and department information to applicants during the hiring process.

Finding 83

The SFPD is not administering a physical ability test (PAT)

The SFPD sought to update or eliminate the PAT requirement to repeatedly pull a firearm trigger. As a result, the entire PAT must be redesigned and validated. As of the date of this report, the PAT is not part of the selection process and was therefore not a part of the assessment. However, a selection process that does not include a physical abilities test is not optimal because physical skills are important for police officers. PATs are supposed to ensure a police officer's ability to perform effectively and simulate police officer work. However, some elements of the test for SFPD applicants may be outdated and inconsistent with emerging practices.

Recommendation 83.1

The SFPD should work with City HR to reinstitute a valid PAT that is aligned with current policing and state POST requirements within 180 days of this report.

Recommendation 83.2

The SFPD should continuously evaluate the PAT process to ensure no unintended impact for any of the diverse candidates it seeks to hire.

Finding 84

SFPD recruitment and hiring practices are disjointed.

The SFPD currently has three separate units within two bureaus that handle recruitment and hiring practices, each reporting to different organizational chains of command. The SFPD's recruitment and hiring functions are spread across two different bureaus and several chains of command. The Professional Standards and Principled Policing Bureau oversees the Recruitment Unit, which has the responsibility to market the department to attract qualified, diverse candidates.

Thereafter, SFPD's Administration Bureau, under the command of a deputy chief, has primary responsibility for the majority of the functions related to the hiring process and training recruits. The Background Investigation Unit, a component of the Staff Services Division of the Administration Bureau, is responsible for investigating and adjudicating the backgrounds of employment applicants.

The Personnel Unit of the Staff Services Division of the Administration Bureau is responsible for human resources functions including the appointment and processing of new hires, promotions, and separations. Finally, the Training and Education Division of the Administration Bureau is responsible for all formalized training functions for the Department and includes the Academy, the Field Training Office, the Office of Education and Training, and the Firearms Range.

Each of these units, divisions, and bureaus plays a critical role in advancing diversity in the SFPD. However, by splitting up the chains of command, recruitment and hiring practices become 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 84.2

The SFPD should establish a recruiting and hiring committee to continuously improve and streamline processes for applicants. The process should be as user-friendly as possible.

Finding 85

The SFPD's Recruitment Unit has implemented an active recruitment program focused on diversity and targeted recruiting throughout San Francisco but does not measure or validate the effectiveness of their outreach and events.

Recommendation 85.1

The SFPD should continue supporting and overseeing this initiative and ensure the Recruitment Unit continues to implement best practices for recruitment, training, and outreach to improve diversity and cultural and linguistic responsiveness of the SFPD.

Recommendation 85.2

The SFPD should consider assigning more resources, by way of community outreach and recruiting officers, to further engage underrepresented communities.

Recommendation 85.3

The SFPD should expand its community partnerships and outreach to create a community ambassador program to identify and train community leaders to aid in the SFPD's recruitment process.

Recommendation 85.4

The SFPD should explore approaches to measure or validate the effectiveness of their recruitment outreach and events. The SFPD could do a community satisfaction survey or conduct GIS analysis to see whether all communities have access to these events.

Finding 86

The Background Investigation Unit is staffed by part-time investigators and is comprised of a mix of modified duty officers and retired officers.

Recommendation 86.1

The SFPD should staff the Background Investigation Unit with full-time investigative personnel who have the required training and requisite experience and who are invested in the area of investigations.

Recommendation 86.2

The SFPD should ensure that there is diversity within the investigators that comprise the Background Investigation Unit.

Finding 87

The Background Investigation Unit lacks valid performance measures to evaluate background investigators.

Recommendation 87.1

The Background Investigation Unit should continue the process of developing and implementing performance measures to evaluate the unit's investigators in terms of outcomes such as length of investigations, timeliness of investigations, numbers of contacts with the applicant, consistency of investigative approach, and hiring recommendations.

Recommendation 87.2

The SFPD should evaluate the overall background investigation process including the demographics of candidates interviewed and progressed for hiring decisions.

Finding 88

Gender, racial, and ethnic minority recruits were terminated at a higher rate from recruit training than White male recruits.

Gender, racial, and minority candidates accounted for 68.1 percent of all recruit terminations.

Recommendation 88.1

The SFPD should conduct ongoing review and analysis of release rates and their impact on diversity and identify mitigation measures to support the success of diverse candidates.

Recommendation 88.2

The SFPD should evaluate why recruits are failing and develop additional training mechanisms to assist recruits in successfully completing California POST requirements.

Recommendation 88.3

The SFPD should evaluate whether orientation for recruits has positively impacted disproportionate termination rates related to Emergency Vehicle Operations Training failure. If not, the SFPD should identify other strategies to assist recruits.

Recommendation 88.4

The SFPD should continually audit and review each phase of the hiring process to ensure there are no unintended consequences that limit the advancement of its diversity goals.

Finding 89

The SFPD lacks a strategic plan for diversity including recruitment, retention, and advancement.

The SFPD is to be commended for its diversity in overall staffing.

Recommendation 89.1

As part of the Strategic Plan (recommendation 39.1), the SFPD should develop a comprehensive diversity strategic plan that articulates the department's vision and commitment to organization-wide diversity initiatives including recruiting, hiring, and retaining a diverse and high-performing workforce. For this recommendation, the diversity strategic plan should

- *identify specific diversity recruiting priorities that are informed by empirical data that identify areas of underrepresentation;*
- *identify specific recruiting activities and targets for diversity recruiting emphasis;*
- *establish specific responsibilities for implementing and supporting action items for diversity program staff;*
- *establish performance measures to track progress, solidify commitment, and ensure accountability across the organization for diversity in all ranks and units.*

Finding 90

The SFPD does not have representative diversity within all its ranks in the organization, especially in the supervisory and leadership ranks.

Through visible commitment to diversity at all ranks of the department, the SFPD can establish itself as a welcoming organization for all communities.

Recommendation 90.1

The SFPD should regularly and systematically capture and report the demographic composition of its supervisory, management, and senior leadership ranks to establish an ongoing mechanism to conduct comparative analyses against the overall workforce composition.

Recommendation 90.2

The SFPD should commit to ensuring transparency and diversity in key assignments predicated on advancing and developing a talented and diverse pool of leaders.

Finding 91

The promotion process is not transparent.

The lack of transparency has created a level of distrust of the process in segments of the department.

Recommendation 91.1

The SFPD should increase the level of transparency of the promotion process and should clearly outline the qualifications required to advance for promotion.

Recommendation 91.2

The SFPD should consider providing feedback to unsuccessful candidates for promotion as a means of advancing institutional knowledge and performance improvement.

Recommendation 91.3

The SFPD should ensure that there is diversity on the panel that oversees promotions and should consider adding community members or outside observers (or both) to the panel.

Finding 92

The SFPD does not require the *Final Report of the President's Task Force on 21st Century Policing* as required reading for the promotional exam.

Recommendation 92.1

The SFPD should require the Final Report of the President's Task Force on 21st Century Policing as reading for all promotions.

Recommendation 92.2

The SFPD needs to require this assessment report as reading for all promotions.

Finding 93

The SFPD's Police Employee Groups (PEG) have a perception that their input and contributions to the department are not seriously considered.

Recommendation 93.1

The SFPD and the Police Employee Groups should look for ways to better institutionalize and incorporate their input into department operations where appropriate. Opportunities may include using members of the PEGs to

- *serve on department panels and committees;*
- *help address issues of bias as part of the department's ongoing training by bringing forth their experience and perspective;*
- *work as community ambassadors for community members or as recruiters for hiring;*
- *address areas of institutional practices that could be considered biased.*

Finding 94

The SFPD does not maintain, analyze, or use data to support and forecast human resource needs, including diversity staffing, succession, or basic demographics.

The SFPD cannot readily identify basic demographic data on its employees or readily access training records, separation records, and other human resource data for analysis and development in the department.

Recommendation 94.1

The SFPD should identify its data needs for personnel and human resource analysis, including organizational diversity, succession and forecasting, training records, and separation data. The collection of data should allow the agency to conduct a barrier analysis.

Recommendation 94.2

The SFPD should prioritize the personnel and human resource data to better inform and support management decisions and practices.

About the COPS Office

The **Office of Community Oriented Policing Services (COPS Office)** is the component of the U.S. Department of Justice responsible for advancing the practice of community policing by the nation's state, local, territorial, and tribal law enforcement agencies through information and grant resources.

Community policing begins with a commitment to building trust and mutual respect between police and communities. It supports public safety by encouraging all stakeholders to work together to address our nation's crime challenges. When police and communities collaborate, they more effectively address underlying issues, change negative behavioral patterns, and allocate resources.

Rather than simply responding to crime, community policing focuses on preventing it through strategic problem solving approaches based on collaboration. The COPS Office awards grants to hire community police and support the development and testing of innovative policing strategies. COPS Office funding also provides training and technical assistance to community members and local government leaders, as well as all levels of law enforcement.

Another source of COPS Office assistance is the Collaborative Reform Initiative for Technical Assistance (CRI-TA). Developed to advance community policing and ensure constitutional practices, CRI-TA is an independent, objective process for organizational transformation. It provides recommendations based on expert analysis of policies, practices, training, tactics, and accountability methods related to issues of concern.

Since 1994, the COPS Office has invested more than $14 billion to add community policing officers to the nation's streets, enhance crime fighting technology, support crime prevention initiatives, and provide training and technical assistance to help advance community policing.

- To date, the COPS Office has funded the hiring of approximately 129,000 additional officers by more than 13,000 of the nation's 18,000 law enforcement agencies in both small and large jurisdictions.
- Nearly 700,000 law enforcement personnel, community members, and government leaders have been trained through COPS Office-funded training organizations.
- To date, the COPS Office has distributed more than eight million topic-specific publications, training curricula, white papers, and resource CDs.
- The COPS Office also sponsors conferences, roundtables, and other forums focused on issues critical to law enforcement.

The COPS Office information resources, covering a wide range of community policing topics—from school and campus safety to gang violence—can be downloaded at www.cops.usdoj.gov. This website is also the grant application portal, providing access to online application forms.

In response to requests from city officials who asked the U.S. Department of Justice to conduct an in-depth review of the policies and practices of the San Francisco Police Department (SFPD), the COPS Office launched the Collaborative Reform Initiative for Technical Assistance (CRI-TA) with the SFPD.

The COPS Office supports law enforcement agencies by implementing and sustaining reforms that increase public trust through improvements in community policing practices, transparency, professionalism, and accountability while taking into account national standards, promising practices, current and emerging research, and community expectations.

Although the COPS Office found a department that is committed to making changes and working with the community, it also found a department with outdated use of force policies that fail the officers and the community and inadequate data collection that prevents leadership from understanding officer activities and ensure organizational accountability. The department lacked accountability measures to ensure that the department is being open and transparent while holding officers accountable. Disparities were found in traffic stops, post-stop searches, and use of deadly force against minorities. Altogether, the COPS Office identified 94 findings and developed 272 associated recommendations.

This report is a road map to reform policing in San Francisco to conform to community expectations and improve public safety. This report summarizes the full assessment including findings and recommendations that will help the department modernize its policing practices and enhance community trust.

COPS
Community Oriented Policing Services
U.S. Department of Justice

U.S. Department of Justice
Office of Community Oriented Policing Services
145 N Street NE
Washington, DC 20530

To obtain details about COPS Office programs, call
the COPS Office Response Center at 800-421-6770.

Visit the COPS Office online
at **www.cops.usdoj.gov.**

e061628768
Published 2016