
Oakland Police Department Office of the Inspector General



Quarterly Progress Report October - December, 2017

Oakland Police Department
Office of Inspector General

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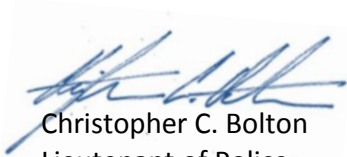
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Introduction

The Oakland Police Department Office of Inspector General serves as an internal function of risk management and evaluation of police performance, outcomes, and related policy. OIG promotes quality policing, police management, and accountability to effect, promote and sustain positive change for the organization and community we serve.

This report covers formal audits and reviews completed during the fourth quarter of 2017. In addition to these audits and reviews, OIG served as the liaison between the OPD and the Independent Monitoring Team, provided technical support and assistance pertaining to stop data collection and risk management practices, and assisted with the completion and reporting of six additional inspections covering a range of important topics: Supervision consistency and control, arrest review and approval protocols, use of force investigations, and Internal Affairs procedures and compliance were routinely inspected during the quarter.

As we enter a new year, our focus will remain on identifying areas of audit or review to help ensure sustainable progress is achieved. Our goal is to demonstrate that combinations of rigorous self-assessment, objectivity, and transparency are not only beneficial, but are recognized as essential to the sustainment of public safety best practices.



Christopher C. Bolton
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Summary: Officer Integrity Trends and Other Critical Observations Regarding Hiring and Training Practices Follow-Up

By Rose Sutton, MPP, CGAP, Police Performance Auditor

Objective

Determine whether the eleven recommendations from the [Officer Integrity Trends and Other Critical Observations Regarding Hiring and Training Practices](#) report have been considered or implemented.

Background

In December 2016, the Oakland Police Department's (Department) Office of Inspector General published a performance report on officer integrity trends and other critical observations regarding hiring and training practices.

Observations and recommendations focused on the Department's ability to effectively identify, assess and manage personnel related risks involving misconduct or unethical behavior. Ultimately, eleven recommendations for improved internal controls over policies and practices were offered and wholly accepted by the Department.

Summary of Follow-Up Review

Six recommendations have been addressed while five remain partially addressed or unaddressed. Some partially addressed recommendations are a result of a recent reorganization of functional units and newly assigned personnel. New management personnel reserve the right to reassess performance outcomes and make mid-course corrections as necessary.

OIG encourages timely reassessments of policies, procedures and systems that lead to improved efficiencies over the handling of personnel related risk.

Numerous unaddressed or partially addressed recommendations regard planned or in-progress improvements to the Department's personnel assessment system and related databases. Ensuring the capability of electronically tracking, storing and analyzing police academy and field training personnel data within the Department's central risk

management database remains a critical step. The OIG is aware that these related projects are underway and that the recommendations and commitments are well understood.

Key Strengths

- ✓ Substantive changes to the way hiring and training information is collected and communicated should help management be more aware of personnel related risks as police trainees matriculate into sworn officers.
- ✓ Greater involvement by the City's Department of Human Resources and Office of the City Attorney during the hiring process now provides a wider range of perspectives and input.

Key Weaknesses

- ✗ Not all background investigators receive POST certified training, due to competing priorities, directives and sometimes unpredictable work schedules according to the Department.
- ✗ Changes to recruiting, hiring and training practices do not appear to be *finalized* into written policy.
- ✗ Although underway, the consolidation of academy and field training performance data with PRIME and/or PAS personnel data has not yet occurred.

Key Recommendations

- Designate and train Department POST certified instructors, thereby qualifying them to provide future on-site background investigation and update trainings to background investigators.
- Codify recruiting and hiring practices into a *finalized* written policy.
- Continue projects which will eventually provide training data to all supervisors and commanders within the central performance metrics environment.

Officer Integrity Trends and Other Critical Observations Regarding Hiring and Training Practices Follow-Up

Background

In December 2016, the Oakland Police Department's Office of Inspector General (OIG) published a performance report on officer integrity trends and other critical observations regarding hiring and training practices. Observations and recommendations focused on the Department's ability to effectively identify, assess, mitigate and manage personnel related risks involving potential misconduct or unethical behavior. Ultimately, eleven recommendations for improved internal controls over policies and practices were offered and wholly accepted by the Department.

Also in December 2016, the Department provided a written response to each recommendation that included immediate and planned actions to address observed deficiencies, as well as additional areas for further improvement. Responses included the assignment of the responsible manager or commander and proposed due dates for addressing the recommendations or correcting conditions.

On February 27th, 2017, Chief Anne Kirkpatrick assumed the role of Oakland's Chief of Police, and since her arrival numerous changes have been made to organizational structure and command. On October 25th, 2017, the Department restructured critical functions related to the administration of personnel and personnel performance monitoring to report directly to the newly created position of Deputy Director overseeing Bureau of Services. Similarly, functions of recruiting, background investigations, academy training and officer field training are now consolidated and commanded through the Training Division and report to the Assistant Chief of Police.

Considering these major changes, command staff are reexamining OIG's 2016 recommendations and the subsequent changes made to management practices. The examination of these management practices will be based on their practical value given staff feedback, available resources and actual performance outcomes. Command staff retain the choice to make mid-course corrections and other changes as they deem appropriate and previous plans or commitments cited in the Department's 2016 response may change under a new Chief of Police, organizational restructure, and newly appointed or transferred chains-of-command. OIG encourages any timely reassessment of policies and procedures that lead to improved efficiencies over the handling of personnel related risk.

Objective and Scope

The objective of this follow-up review is to determine whether the recommendations from the *Officer Integrity Trends and Other Critical Observations Regarding Hiring and Training Practices* report have been considered or implemented. And while the Department subsequently made several additional

commitments in its written response, OIG's scope of review places emphasis on its own eleven recommendations. As such, OIG did not verify the entirety of the commitments made by the Department; however, where relevant, any other circumstantial deficiencies or improvements may be mentioned and used in determining a recommendation's status. OIG reviewed supporting documentation and conducted interviews to substantiate changes made to operational procedures.

2016 Recommendations and 2017 Follow-up Status

The following categories are used to describe the status of the recommendations:

- **Addressed** – the Department has implemented changes and OIG reasonably assumes that operational risk(s) has been lessened to a satisfactory degree.
- **Partially Addressed** – the recommendation has been partially addressed and implemented; however, part of the recommendation remains open. Further work is needed to close the recommendation. Or, given the recent change in command staff responsible for many of the functional areas of focus in this report, the completion of OIG's assessment of the status of the recommendation is on hold or pending due to ongoing reviews or other factors.
- **Unaddressed** – the Department has not implemented the recommendation or alternative actions that would equally address the recommendation. OIG has determined that the Department has not made sufficient progress towards implementing internal control measures to lessen operational risk(s) to a satisfactory degree.

2016 Recommendation 1

The Department should evaluate the value and feasibility of including the number of sustained complaints and allegations as a risk factor that is tracked and reviewed through the risk management process (IPAS), when in the event these risk factors exceed the Department's average or peer group average.

2016 Department Response 1

The Department concurs with this recommendation and will incorporate sustained complaints into its Performance Assessment System (PAS), which is currently being upgraded. As part of this upgrade, risk factors, thresholds, and reporting are being evaluated.

In the meantime, the Internal Affairs Division will create a quarterly report that will include a comparison of sustained complaints for all personnel. The first report will be published in January 2017 and will include a review of the most recent five years of data. Executive Command will review the list with the PAS Unit on a quarterly basis to assess whether any personnel with high numbers of sustained complaints relative to the population should be referred to the PAS process. This will allow for greater risk management coverage and provide further assurance that relevant information is being assessed.

2017 Follow-Up Status 1

OIG considers this recommendation addressed, but the manual process of review now in place should be formally considered as an additional measurement, metric or report to be made available in future versions of the Department's personnel and performance risk evaluation system.

On January 30th, 2017, the Department held its first quarterly meeting to review the last five years of sustained misconduct cases held against Department personnel. Attendees included the Assistant Chief of Police, the Chief of Staff to the Chief of Police, command staff representing the Criminal Investigations Division, Bureau of Services, and staff from the PAS Administration Unit (who serve to track, assess and monitor personnel-related risk). OIG staff also attended this meeting to assess the evaluation and consideration given for patterns and rates of sustained misconduct by Department command staff. Since her appointment, Chief Kirkpatrick has also been in attendance.

The January meeting was thoughtfully led by the PAS Administration Unit with quarterly meetings continuing as planned and often ending with specific deliverables (e.g., management referrals usually resulting in monitoring). Per PAS Administration Unit staff, these meetings have proven valuable in identifying personnel not previously considered for supervision, but based on their above average rates of sustained complaints and/or allegations are now being assessed.

The PAS Administration Unit - in conjunction with the Internal Affairs Division - has begun using the Department's recently launched electronic Performance, Reporting, Information and Metrics Environment (PRIME) system¹ to retrieve sustained complaint and allegation data in preparation for the quarterly meetings. However, per the PRIME Development Team, "sustained complaints are not part of the current threshold calculations," and PRIME does not automatically track or generate reports. Thus, tracking comparisons of sustained complaints remains a more manual than automatic process performed by the Internal Affairs Division. The PRIME Development Team maintains that the rate of sustained complaints is too few to yield statistical meaning and that simply reviewing *all* sustained complaints and allegations (as is the current practice) represents the most inclusive approach to addressing this kind of personnel related risk. The PRIME Development Team may revisit the idea of measuring against peer groups if the volume of sustained complaints rises in the future.

The City of Oakland and Oakland Police Department are currently evaluating required and needed improvements to the performance and function of PRIME as it now exists. OIG reasonably expects that this request for report and analysis of sustained findings will be contained in a future scope of work.

2016 Recommendation 2

The Department should evaluate its use of other police academies as training grounds and/or ensure all academy graduates entering the Field Training Program are equally and effectively evaluated and indoctrinated into the Department's culture of accountability and integrity.

¹ As reported in the Officer Integrity Trends and Other Critical Observations Regarding Hiring and Training Practices report, the Internal Personnel Assessment System (IPAS) centralizes employee performance information that is collected from various sources. Since the report was released, IPAS was replaced by PRIME.

2016 Department Response 2

The Department concurs with this recommendation and has discontinued its practice of using non-OPD basic academies to train new police officer hires. Additionally, the Department will no longer hire academy graduates who have attended non-OPD academies of their own accord. This allows for greater alignment with OPD mission, values, and culture.

The Department recognizes the challenges new officers may have when they do not have the opportunity to attend an OPD academy, where bonds are created between trainees and other Department personnel. Therefore, for existing non-OPD academy graduates and future experienced police officer hires, the Department has revised its transitional course to ensure a better integration into the Department's culture of professionalism. The transitional course was six weeks, but has recently been expanded to eight weeks of training that includes a thorough review of OPD policies and procedures, procedural justice training, and the Department's values.

In addition, the new officers are rotated through several specialized units to provide them more depth and breadth of experience before they begin field training. The rotations include placement in the Criminal Investigation Division, Internal Affairs, Special Victims Unit, School Resource Unit, Police Activities League, and Background and Recruiting. This rotation also allows the new police officers an opportunity to become familiar with the inner workings of the Department's various sections and units that play an overall part in the Department's daily operations, and to provide them with opportunities to engage with the community prior to transitioning to the Field Training Program. Additionally, this allows an opportunity for the new police officers to meet employees, both sworn and professional staff, and learn more about their roles in operations.

Moreover, the Training Section now hosts a social mixer during the transitional course to allow all employees of the Department to meet the new police officers. This mixer is meant to encourage socialization between the junior officers and veteran officers, thus facilitating creation of new relationships and opportunities for mentoring. Feedback received from new police officers indicated this mixer has made them feel more welcome within the Department and that they feel more like they are a part of the Department's family.

2017 Follow-Up Status 2

OIG considers this recommendation addressed.

The Department has discontinued the practice of hiring officers who received a POST certificate for training outside the Department's own academy training environment, which includes individuals who sponsored their own enrollment. The last use of an external academy occurred in December 2016. Since then, the Department has hosted three of its own academy classes (i.e., the 175th, 176th and 177th Academies).

While the Department has retained the option to hire *seasoned* police officers who have previous law enforcement experience, it has not hired any seasoned officers in 2017 and per Training Section staff, the Department does not plan to hire external officers in the near future. If, however, seasoned officers were hired, these officers would be required to attend the 8-week transitional course to familiarize

themselves with the Department as described by the Department in their initial response to this recommendation.

On November, 3rd, 2017, the Department held a social mixer for four recent lateral graduates from the 251st SFPD academy.

Recommendation 3

OIG strongly recommends that the Department should codify the current practice of using the academy peer evaluations into written policy with a provision that it be viewed as both a risk management tool and as a hiring and training performance metric that will be routinely assessed. Lastly, the Department should ensure trainees are made aware of and have access to an anonymous reporting resource (i.e., the City's pre-existing Fraud, Waste and Abuse hotline).

2016 Department Response 3

The Department concurs and has revised the Academy Coordinator's Manual to reflect this recommendation. The Department codified the practice of using the academy peer evaluations into written policy with a provision that it be viewed as both a risk management tool to mitigate risk and as a hiring and training performance metric. When a Police Officer Trainee receives a significant amount of negative peer evaluations, it triggers an automatic review of the trainee's file by the Academy Coordinator. If there are any at risk issues discovered in conjunction with the negative peer evaluations, the police officer trainee is given a performance deficiency notice (PDN) which includes a development plan to correct the behavior. In addition to the PDN, the Academy Coordinator forwards any risk issues identified through the chain of command, which could result in termination. These concerns and the development plan are discussed with the trainee. Moreover, new hires are provided training on confidential reporting of complaints by the Personnel Section and the Training Section. The first incidence of this training takes place during the orientation week – prior to the beginning of the academy. The City's Department of Human Resources Management also provides an on-boarding orientation during the last week of the academy that includes information about the City's process for reporting misconduct.

2017 Follow-Up Status 3

OIG considers this recommendation partially addressed.

OIG verified comments from peer evaluations were used to support separation recommendations, indicating their use as a risk management tool. Specific Police Officer Trainee (POT) comments were included verbatim to illustrate the type of concerns identified by a trainee's peers in memos to the Office of the Chief of Police.

At the time of this review, six recommendations for Police Officer Trainee separations were forwarded by the Academy Coordinator through the chain of command to the Office of Chief of Police for review and determination (in 2017). Additionally, as evidenced by the written responses reviewed by OIG, command staff appeared diligent in their decision-making process, adding additional comments when necessary.

Moreover, it appears that the Academy culture reflects a responsive environment where POTs feel secure in reporting ethical concerns and integrity issues to their Recruit Training Instructors without fear of negative consequence. For example, recent academy feedback that highlighted concerns regarding one POT's potentially unsuitable demeanor and conduct served as a factor for the trainee to be dismissed from the academy. The sources of the peer feedback were recognized by Training Section staff for their commitment towards maintaining the highest levels of professionalism.²

OIG spoke to the City's Department of Human Resources Management staff, who shared that since March 2016 the Oakland City Auditor's Office has presented information about the City's anonymous Fraud, Waste and Abuse Hotline during new employee orientation sessions, which all new City employees are required to attend, including new police personnel.

OIG was unable to verify whether the Academy Coordinator's Manual was updated as originally mentioned by the Department. OIG reaffirms its recommendation that the Department should codify the current practice of using the academy peer evaluations into written policy with a provision that it be viewed as both a risk management tool and as a hiring and training performance metric that will be routinely assessed. OIG reaffirms that this recommendation be further implemented within future improvements to PRIME.

2016 Recommendation 4

The Department should track separation based on employment phase as a possible risk management performance metric to ensure that the Department is removing those engaged in misconduct and/or unethical behavior as early as possible during probation.

2016 Department Response 4

The Department concurs with the recommendation and has requested funding to upgrade its current Personnel Database to capture this information. Until this upgrade takes place, the Department will create a system to track this information manually.

2017 Follow-Up Status 4

OIG considers this recommendation partially addressed.

While the Department did secure funding for an updated personnel database - which it is currently in the process of implementing - the database currently lacks the functionality to track separation based on employment. And while the database does capture the reason for employment separation and the date of separation, this information does not assist the Department in tracking rates which would serve as a risk management performance indicator reflecting the Department's diligence in addressing personnel-related risk - depending on where in the employment stage individuals are being removed (ideally, most occurring during the academy). Such tracking would allow for a clear measure of

² While the Training Section was aware of the performance deficiencies of this POT and were closely monitoring the POT's ability to meet the training standards set forth by the Academy, the lack of peer endorsement capped a series of difficulties resulting in the trainee's separation from the Department.

separation as police trainees matriculate into sworn officer with eventual full civil service privileges (at which point terminating sworn personnel for misconduct offenses becomes exceedingly challenging).

OIG reaffirms that this recommendation be further implemented within future improvements to PRIME as a possible risk management performance metric to ensure that the Department is removing those engaged in misconduct and/or unethical behavior as early as possible during probation.

Recommendation 5

The Department should develop a policy detailing the requirements for applicant/trainee tracking and records maintenance, including consideration of consolidating siloed systems or ensuring that information is consistent among all units. Additionally, OIG recommends the Department direct the Training Section to prioritize an organized system of record keeping (preferably electronic) that would allow for a quick and comprehensive review of all trainees and overall academy performance. This includes making every effort to obtain academy performance information for lateral and POST Academy Graduate hires. Resources should be provided to the Training Section to accomplish this task in an expedited manner.

2016 Department Response 5

The Department concurs with this recommendation and is currently working on implementing a more robust database to capture trainee data electronically and more consistently. Recently, the Field Training Unit implemented the use of an electronic database, which has eliminated the need for paper files. The Training Section is working with the Information Technology Department to secure a database for tracking new hires and Academy trainees that is compatible with the Field Training Unit's new system. The database will ensure that all new hires have an easily accessible electronic record that tracks performance, conduct, and employment status.

In the meantime, the Personnel and Training Division is strengthening its current manual tracking system to include separation dates, the stage of separation, and the reason for separation, if known, to ensure the accuracy and completeness of data.

Furthermore, the Department requested Academy performance information (training files) for police officers hired as laterals and post academy graduates (PAGs) from non-OPD training academies. The Department has received several files and several others have been promised from other agencies, but have not yet been received.

2017 Follow-Up Status 5

OIG considers this recommendation partially addressed.

The Department currently uses software from LEFTA Systems to track field training for new officers. It also uses products from other vendors for tracking other types of training (products called TMS and PowerDMS. To address the issues inherent in this multi-siloed approach, the Department is working with the City's IT Department (ITD) to combine the functions currently provided by these three systems onto one platform – a product called METR, also from LEFTA Systems. In addition, ITD and the

Department are working with LEFTA Systems to develop functionality to track Academy training – something currently done by hand and with spreadsheets. Once finished, this module will also store its data in the integrated METR platform.

Once the transition from TMS and Power DMS to METR is complete and the Academy training module is also finished and launched, the Department can develop training-related reporting and dashboards for both the day-to-day management of various training functions and, through “PRIME 2.0” or its future derivative, to meet the risk management needs of the Department from one integrated training database.

Per Personnel Section staff, the manual tracking method is more detailed now in its data collection, but lacks the inclusion of specific reasons for separation beyond general categories. OIG reaffirms that this recommendation be further implemented within future improvements to PRIME.

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The Department did request Academy training files from previously hired laterals who attended a non-Department academy. Only one law enforcement agency responded with documents. Any further action related to the training file request is beyond the administrative control of the Department.

Recommendation 6

The Department should consolidate all known sources of documented misconduct and behavioral issues and incorporate it into the Department’s overall pre-existing risk management strategy. Additionally, the Department should develop an assessment tool and response procedure that reflects the cause of misconduct based on an individual’s demonstrated behavioral risk pattern.

2016 Department Response 6

Department agrees with the recommendation and has implemented transition meetings to share risk data between phases of hiring and training. However, government code limits the sharing of information learned in the background investigation. California Code of Regulations says that applicant information provided in their background investigation is private and confidential. The Department now convenes transition meetings to formalize communication and documentation of newly hired police officers to ensure better matriculation through the Academy and transition into new assignments. At each appropriate phase, transition meetings will occur between:

- Human Resource Management staff and Recruiting and Background Unit staff
- Recruiting and Background Unit staff and Training Section staff
- Training Section staff and Field Training Program staff
- Field Training Program staff and Bureau of Field Operations (Patrol) staff

These meetings are meant to ensure proper communication of potential risk management issues, documentation of risk, and strategies for improvement. The Bureau of Services held its first transition meeting between the Recruiting and Background Unit and Training Section on October 26, 2016.

In addition to transition meetings, the Department will convene quarterly meetings with the Background and Recruiting Unit, Training Section and Field Training Program to discuss trends and patterns observed in applicants and trainees.

Going forward, the Department will arrange a final interview with all probationary officers to administer their final rating, and to determine whether the probationary officer has met all requirements to continue working as a permanent police officer.

2017 Follow-Up Status 6

OIG considers this recommendation addressed.

OIG acknowledges the limitation the law imposes on sharing personnel information, rendering OIG's recommendation challenging to implement. However, the recent organization and transition meetings will allow for greater information transference of personnel related risk within legally allowable parameters.

Recommendation 7

OIG strongly recommends that, if during the background investigation it becomes apparent that a pattern of past misbehavior or a specific combination of concerning facts and circumstances emerges, the Department should direct the background investigators to, using their best professional and impartial judgment, clearly document in the narrative summary:

- The possible consequences to the Department if past undesirable behavior were to reoccur
- The likelihood of reoccurrence of the undesirable behavior
- The relevance of the past behavior in effectively performing the duties required
- The length of time between the undesirable behavior and the time of application for employment.

2016 Department Response 7

The Department concurs and has implemented a more comprehensive review of applicants. The Department conducts a review of the background investigation, including a pre-review by the Background and Recruiting staff and a full review by the entire chain of command up to the Chief of Police.

The Recruiting and Background Supervisor now confirms that investigative reports are more complete in their evaluation of areas of risk. The supervisor ensures that an applicant's summary narrative captures all risk management issues related to drugs, alcohol, criminal activity, negative references and any other factors that could be considered misconduct or at risk behavior. Additionally, the Department has implemented the analysis of any relevant past behavior into the overall background investigation evaluation, as well as evaluating the length of time between the identified undesirable behavior and the time of applying to the Department. For example, if the applicant was arrested for a DUI ten years prior to applying to the Department, the background investigator has been directed to document and evaluate this information for further review by the Department's chain of command.

Finally, the OPD Personnel Manager is in conversation with the clinical psychologist employed by the City to conduct psychological assessments to determine suitability for hire, to explore the feasibility of including an evaluation of the following factors in each psychological assessment:

- The possible consequences to the Department if past undesirable behavior were to reoccur
- The likelihood of reoccurrence of the undesirable behavior

The relevance of the past behavior in effectively performing the duties required

2017 Follow-Up Status 7

OIG considers this recommendation addressed.

The Department has implemented alternative actions that equally address this recommendation. The Department has changed its Background Narrative report to reflect a summary of POST's investigative dimensions, including factors like the applicant's integrity and decision making and judgement. Revisions also include an overall final risk assessment ranging from 'low risk' to 'high risk' and 'Further evaluation is needed to determine level of risk.' This assessment is documented and captures the background investigator's consideration of misconduct.

Recommendation 8

The Department should consider whether all integrity issues identified in the Academy should be handled through the Internal Affairs process.

2016 Department Response 8

The Department concurs and, as of October 31, 2016, the Training Section has ensured that all integrity issues are handled per Department General Order M-3, Complaints Against Department Personnel.

2017 Follow-Up Status 8

OIG considers this recommendation partially addressed.

The Department has continued handling Academy POT rule violations through the Training Section's discipline process, which includes minor performance and integrity issues, while referring the most serious incidents of misconduct to the Department's Internal Affairs Division for investigation. The Training Section has charted its POT discipline process to include clear decision pathways for discipline. These pathways are determined by the seriousness of the violation committed and surrounding circumstances. Corrective action ranges from the use of simple interoffice letters, training, counseling, and mentoring within the training environment up to recommendation for termination. In 2017, the Training Section referred one incident of serious misconduct to the Department's Internal Affairs Division for investigation while concurrently recommending immediate termination.

The Department's policy on complaint initiation – especially where it applies to patterns of performance issues – may not coincide with best practices of training. If the Department decides that the Training Section should retain its discretion over which incidents of misconduct occurring in the Academy environment are forwarded to IAD and which are not, as appears to be the case, then the Department

should make clear its criteria for serious misconduct and/or unethical behavior in written policy. This should allow for a more uniform understanding among Department personnel of the equitable process used for disciplining POTs. OIG was unable to verify whether the Academy Coordinator's Manual has been updated (See Recommendation #3). How and when to handle discipline within the training environment should be a topic to include in such a manual.

Recommendation 9

The Department should consult with its legal advisors regarding any possible implications related to this observation (possible violation of the timing of psychological evaluations).

2016 Department Response 9

Although no such violations were found in OIG's review since 2012, in order to ensure that this practice is no longer in place, the Department will conduct an audit of files for the most recent Academy class. Furthermore, the Bureau of Services Deputy Chief has consulted with legal advisors regarding any possible implications relating to the timing of the psychological evaluation for those applicants who may have been impacted. There were no legal implications identified.

2017 Follow-Up Status 9

OIG considers this recommendation addressed.

OIG verified the Department sought communication with the Office of the City Attorney in December 2016 relating to this recommendation.

Recommendation 10

The Department should evaluate opportunities for key City stakeholders (like Department of Human Resources Management) to participate in the final determination of POT applicants, if they so choose. When designing an efficient method to meet this recommendation, the Department should take care to (1) not prolong the hiring process; (2) consider the applicant's confidentiality and; (3) not violate Oakland City Charter, Section 218: Non-Interference in Administrative Affairs.

2016 Department Response 10

The Department concurs and will explore opportunities for key stakeholders to participate in the final hiring decision of Police Officer Trainee applicants. The OPD Personnel Manager will extend an invite to DHRM staff and the Office of the City Attorney to participate in the OPD character review process.

2017 Follow-Up Status 10

OIG considers this recommendation addressed.

OIG verified that opportunities for the Office of the City Attorney and the Department of Human Resources to participate in the Department's character review process have been offered and accepted. The Department has included a signature line for City staff (external to the Police Department) on the sign-off sheet for each candidate reviewed, signifying attendance in the process. However, to be clear,

participation is at the discretion of the Office of the City Attorney and the Department of Human Resources. OIG encourages the continuation of this positive risk management practice.

Recommendation 11

The Department should revise its current policy (which was last updated in 1999) within 6 months so that POST certified training is a requirement for those performing background investigations that are not assigned to the R&B Unit. Additionally, background investigators should be required to have investigative experience, if they have never previously worked within the R&B Unit. Also, in keeping with ensuring quality investigations are being performed, greater managerial oversight – beyond just requiring POST training – should also be considered. For example, R&B Unit management staff should monitor caseload and staffing resources, perform quality checks for policy and regulatory compliance, and conduct routine reviews of background investigator performance, specifically IPAS data.

2016 Department Response 11

The Department agrees with the recommendation and will revise policy regarding the selection and oversight of background investigators. The Background and Recruiting Unit has already changed its practice and now requires all background investigators to meet specific minimum qualifications to conduct background investigations on applicants, including a minimum number of years of experience, prior investigative experience, prior background investigative experience, and completion of a POST (Peace Officers Standards and Training) certified background investigation course. Also added to the policy is the requirement of additional training and education in the areas of implicit bias and Procedural Justice, along with the required annual POST mandated background investigation update training.

The Recruiting and Backgrounds Unit now requires a confidentiality form, chronological log of events that highlights a timeline of all work completed by the background investigator, and an investigator checklist that certifies that all required work has been completed prior to the completion of the background investigation. Also, additional levels of managerial review have been added to not only identify potential risk presented by an applicant, but to also confirm that a thorough investigation has been completed by the background investigator. The Department is currently assessing the viability of outsourcing background investigations to increase consistency and allow officers to be reassigned to more critical needs. The Department is also seeking to add a Program Analyst/Recruit Coordinator to the Recruiting and Background Unit to allow the supervisor additional time to focus on background investigators and investigations.

2017 Follow-Up Status 11

OIG considers this recommendation partially addressed.

As of October 11, 2017, and based on a list provided by the Recruiting and Backgrounds Unit, only 57% of investigators (23 of 40) who completed background investigations in 2017 have received POST certified training. While this represents an improvement from the 38% of background investigators with POST certified training reported in 2016, the current amount of untrained background investigators remains concerning. The Department's 2016 response stated that its practice had changed and now

background investigators must meet specific minimum qualifications to conduct background investigations on applicants, including completion of a POST certified background investigation course. This has not been the case.

Moreover, regarding background investigators receiving update courses; a closer review of training dates indicates one background investigator last received POST certified training in 1997, approximately twenty years ago. Three others last received POST certified training in 2001 and one in 2002. Per Recruiting and Background staff, an in-house update training was offered in October. Such update training is not POST certified and OIG was unable to verify whether the in-house training occurred.

Per Department staff, background investigators do register for training, yet given competing priorities and sometimes unpredictable work schedules, attending a course becomes exceedingly challenging. Additionally, courses are not always readily accessible in terms of time and distance. To resolve this, the Department suggests training a Department employee to become a POST certified instructor on the topic of background investigations. This would allow for more accessible on-site training with greater schedule flexibility. OIG supports the consideration of this suggestion and/or its original recommendation.

A draft policy regarding background investigator qualifications and selection was shared with OIG, however it does not explicitly list attending implicit bias or procedural justice training as requirements for background investigator selection. Although all sworn officers are now mandatorily trained on implicit bias and procedural justice, the requirement is not in policy as assured by the Department in its 2016 response. However, it does state that investigators must perform inquiries and evaluations “with consistency and without bias.” The policy also lacks mention of needing a minimum number of years of experience, prior investigative experience and prior background investigative experience as qualifiers to serve as a background investigator. Per the Department, bolstering background investigator requirements are in the process of being incorporated into a finalized version.

The draft policy does include a stipulation regarding a confidentiality form.

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In March 2017, the Department assembled a funding request to hire one Administrative Analyst II and one Police Records Specialist for the Recruiting and Backgrounds Unit, as part of a larger request to facilitate the goal of staffing 800 sworn officers by June 2018. The Department further commented in its funding request that, “The revised review process for background investigations requires additional levels of review and additional steps in the process itself to ensure the selection of the most qualified candidates. An increased workload, to include background investigation review, requires the technical expertise and oversight of a Lieutenant of Police dedicated to this task.” However, in response to a City directive to reduce the Department budget by five percent, these positions were not officially submitted for funding.

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The Department has revised its Background Narrative Report (i.e., used to summarize background investigation results and should include sufficient information for the reviewing authority) to better reflect POST’s ten dimensions for candidate

assessment. The revised report now also includes a new 'Final Assessment – Known Risk Factors' check list for clear indication. All Background Narrative Report are addressed and sent to the Office of Chief Police.

Table 1 Percentage change of POST trained background investigators from Dec. 2016 to Oct. 2017.

Background Investigator POST Training								
December 2016					October 2017			
	Sworn Personnel assigned to R&B Unit	Sworn Personnel not assigned to R&B Unit	Annuitants assigned to R&B Unit	2016 Total	Sworn Personnel assigned to R&B Unit	Sworn Personnel not assigned to R&B Unit	Annuitants assigned to R&B Unit	2017 Total
POST Training	5 (100%)	4 (25%)	5 (31%)	14 (38%)	7 (100%)	12 (44%)	4 (66%)	23 (57%)
No POST Training	0 (0%)	12 (75%)	11 (69%)	23 (62%)	0 (0%)	15 (55%)	2 (33%)	17 (42%)
Total	5 (14%)	16 (44%)	16 (42%)	37 (100%)	7 (18%)	27 (68%)	6 (15%)	40 (100%)

Conclusion

Currently, six recommendations have been addressed, while five remain partially addressed largely because of new or incomplete administrative initiatives. OIG will work to periodically monitor the partially addressed recommendations and report any developments.

Summary: Accuracy of Handcuff and Search Data

By Charlotte Hines, Police Performance Auditor, Office of Inspector General

Objective

Evaluate whether documented handcuff and search data is consistent with associated report narratives and or the circumstances observed in body-worn camera footage for the corresponding incident. OIG also sought to determine the rate of compliance with requirements to document stop data related incident and report numbers on uploaded body-worn camera video files.

Background

This follow-up audit is a result of one of the recommendations in the September 2016 “Review of Department Handcuffing Data which stated *“OIG will conduct a supplementary review of handcuff incidents in which searches occurred to ascertain the extent or potential for errors in additional situations.”* This review also addresses and evaluates a [Stanford University SPARQ \(Social Psychological Answers to Real-world Questions\) recommendation](#) to “tag” video files with incident numbers to allow the Department and researchers to more easily correlate stop data with body-worn camera footage of stops and stop circumstances.

As a result of sustainable compliance progress, OPD requires officers to complete a detailed *Field Interview and Stop Data Report* articulating the reasons for actions taken during a discretionary detention, contact or arrest. The *Field Interview and Stop Data Report* tracks numerous data points regarding each discretionary detention, contact or arrest. Whether handcuffing occurs during a police-community member contact is one such measure which is tracked and analyzed. Additionally, officers are required to record stop data interactions with body-worn cameras and note stop data incident numbers onto the relevant video files.

Review and Findings

OIG reviewed scenarios which appear in stop data infrequently and, due to this level of infrequency, OIG believed that error rates may exist. Findings demonstrated that officers are reporting incorrect handcuffing data when documenting these rare occurrences and that the clear majority of errors represent an over-reporting of handcuff use.

This review also demonstrated strong compliance with policy requiring the notation of stop incident numbers onto corresponding videos of the encounters. OIG detected no inconsistencies when randomly verifying documented stops against video footage of the incident.

Accuracy of Handcuff and Search Data

Objective(s):

- 1) To evaluate whether documented handcuff and search data is consistent with associated report narratives and or the circumstances observed in body-worn camera footage for the corresponding incident.
- 2) Determine the rate of compliance with requirements to document stop data related incident and report numbers on uploaded body-worn camera video files.

Policies Referenced:

Policy 302 "*Handcuffing and Restraints*" (June 13, 2017)

Report Writing Manual R-1 "*Field Interview and Stop Data Report*" (May 22, 2013)

Special Order No. 9101 "*Revised Stop Data Collection Procedures*" (March 1, 2013)

Department General Order I-15.1 "*Portable Video Management System*" (July 15, 2016)

Review of Department Handcuffing Data, September 2016

Overview

This follow-up audit is a result of one of the recommendations in the September 2016 "Review of Department Handcuffing Data which stated "*OIG will conduct a supplementary review of handcuff incidents in which searches occurred in order to ascertain the extent or potential for errors in additional situations.*" This review also addresses and evaluates a [Stanford University SPARQ \(Social Psychological Answers to Real-world Questions\) recommendation](#) to "tag" video files with incident numbers to allow the Department and researchers to more easily correlate stop data with body-worn camera footage of stops and stop circumstances.

Background

The Oakland Police Department is committed to providing fair and equitable public safety services in ways that increase the quality of transparency, community relationships and trust. The Department is also committed to ensuring all stops, searches and seizures are constitutional and performed within Departmental policy. Ensuring the consistency of reported stop, search and handcuffing data is therefore an essential obligation to serve both needs.

OPD requires officers to complete a detailed *Field Interview and Stop Data Report* articulating the reasons for actions taken during a discretionary detention, contact or arrest. The *Field Interview and Stop Data Report* tracks different measures regarding each discretionary detention, contact or arrest between the officers and the community and/or the public. Whether handcuffing occurs during a police-community member contact is one such measure which is tracked and analyzed.

The use of handcuffs and other restraints is recognized as intrusive and as a factor that may influence the community's trust in the police. As stated by courts, the use of handcuffs "substantially aggravates the intrusiveness of an otherwise routine investigatory detention and is not a part of a typical investigative stop."³ Therefore, officers are required to complete a *Field Interview and Stop Data Report*

³Policy 302 "*Handcuffing and Restraints*" (June 13, 2017)

for all discretionary detentions, searches and arrests and include justification for the use of handcuffs in addition to correctly coding the use of handcuffs within the stop data.

Additionally, officers are required to activate their body-worn camera during incidents involving a discretionary detention, contact or arrest.⁴ At the end of, or during their shift if needed to ensure capacity is not exceeded, the body-worn camera footage is uploaded on the Department's server as a file.⁵ To ensure accountability for the proper identification, tracking and chain of custody, each file stored on the server should be labeled with the corresponding report and/or incident number⁶.

Methodology

Consistency of handcuff and search activity documentation

To conduct the audit, the auditor took the following steps. First, the auditor obtained the Department's Field Interview and Stop Data incidents for the period of November 1, 2016 through August 31, 2017. The auditor reviewed the report and found that there was a population of 25,860 stop data records completed for the period.

The auditor used the following fields in the *Stop Data Report* to conduct the audit:

- CAD Incident Number;
- Case Number (if applicable);
- Narrative;
- Subject search conducted (Yes/No);
- Subject Handcuffed (Yes/No);
- Officer(s) involved; and
- Person(s) involved

Secondly, the auditor sorted stop data, isolating only those incidents that met the following three criteria:

- "No Search/Handcuffing:" Incidents in which the stop data record indicated a search was not conducted but that the person detained was handcuffed; The auditor reviewed 146 *No Search/Handcuffing* incidents.
- "Search/No Handcuffing:" Incidents in which the stop data indicated that a search of a non-handcuffed detainee was conducted. 92 *Search/No Handcuffing* incidents were reviewed; and
- "No Search/No Handcuffing:" 95 incidents in which the stop data indicated that neither a search nor handcuffing occurred were reviewed.

⁴ DGO I-15.1, pg. 2

⁵ Ibid., Pg. 6

⁶ Ibid, Pg. 11

The auditor reviewed the corresponding Crime/Supplemental or Field Investigation Report narrative to determine whether the narrative matched the Stop Data Report. The auditor reviewed body-worn camera video footage if a review of narratives determined two conditions:

No Search/Handcuffing

If the officer's narrative did not document a person was handcuffed and/or did not document whether a person was searched.

Search/No Handcuffing

If the officer's narrative did not document that a person was searched and/or document whether handcuffing occurred.

In the *No Search /No Handcuffing* category, the auditor randomly selected 10 incidents and reviewed the body-worn camera footage to ensure footage did not depict searching or handcuffing occurred.

The consistency of incident/report numbers documented on body-worn camera video footage files

To determine the rate of compliance with policy and procedural requirements to document incident and report numbers on uploaded body-worn camera video files of detentions, searches and arrests, the auditor randomly selected 96 incidents. Using the date identified in the incident number, the auditor sought to find the corresponding body-worn camera footage files on the Department's PDRD (Personal Digital Recording Device) server. The auditor determined an incident as in compliance with policy if the associated incident number could be located on the PDRD server and the video footage corresponded with the details within the Field Investigation, Offense, or Supplemental Reports.

Population / Sample

Consistency of handcuff and search activity

The population consisted of 25,860 incidents in the *Field Interview and Stop Data Report*. After sorting the data into the three aforementioned categories, there were 146 *No Search/Handcuffing* incidents; 2,201 *Search/No Handcuffing* incidents; and 16,726 *No Search/No Handcuffing* incidents.

The auditor reviewed the entire population for the *No Search/Handcuffing* incidents. However, because the populations were in the thousands for two of the categories, the auditor conducted a one-tail test with 95% confidence +/- 4%, resulting in sample sizes of 92 *Search/No Handcuffing* incidents and 95 *No Search/No Handcuffing* incidents. Subsequently, the auditor used the "Research Randomizer (<https://www.randomizer.org>), to select incidents in each of the two categories.

The consistency of incident/report numbers recorded on body-worn camera video file footage

The population consisted of 25,860 incidents in the *Field Interview and Stop Data Report*. Using the entire population the auditor conducted a one-tail test with 95% confidence +/- 4%, resulting in a sample size of 96 incidents. Subsequently, the auditor used the "Research Randomizer (<https://www.randomizer.org>), in order to select the 96 incidents for the audit.

FINDINGS

FINDING 1

No Search/Handcuffing: Incidents in which the stop data indicated that a search was not conducted, but the detained person was handcuffed.

Seventy-six percent of the 146 stop data forms accurately reflected search and handcuffing circumstances when compared to report form narratives and/or as reflected in body-worn camera footage. Ninety-four percent (33 of 35 identified incidents) of the stop data errors were attributed to officers mistakenly over-reporting their use of handcuffs during the incident.

The auditor reviewed 146 incidents and found 104 (71%) of them were consistently documented. However, 42 of them were inconsistent. There were 21 (50% of the error rate) incidents in which the officer's report narrative documented that the person was not handcuffed, contrary to the stop data report in which "Handcuffed: Yes" was selected. In these cases where narratives conflicted with the stop data selections, the auditor reviewed the corresponding body-worn camera footage and found that a search and handcuffing occurred in two (10%) incidents. In the remaining 19 (90%) incidents, the video footage showed there was no search and no handcuffing.

In addition, there were 21 (50%) incidents in which the officer's report narrative did not document the handcuffing of the person(s). The auditor reviewed the corresponding body-worn camera footage and found that there was no handcuffing in 14 (67%) incidents and in the remaining 7 (33%) incidents, there was handcuffing that the respective officers failed to document.

FINDING 2

Search/No Handcuffing: Incidents in which the stop data indicated a search of a detainee, who was not handcuffed, was conducted

Ninety-nine percent of the incidents reviewed indicated that the officers Crime / Supplemental Report narratives matched the documentation in the Field Interview and Stop Data Report.

The auditor reviewed 92 incidents and found 91 (99%) of them were consistently documented. Only one incident was inconsistent. The officer's Crime /Supplemental Report narrative indicated that a person was searched and handcuffed. Upon viewing the body-worn camera video footage the auditor found the person was searched and not handcuffed, rendering the officer's narrative incorrect. The officer over-reported their use of handcuffs within stop data.

FINDING 3

No Search/No Handcuffing: Incidents in which the Field Interview and Stop Data Report indicated that neither a search nor handcuffing occurred.

All (100%) of the incidents reviewed indicated that the officers' Crime / Supplemental Report narratives matched what was documented in the Field Interview and Stop Data Report.

The auditor reviewed 95 incidents and found all (100%) of them were consistent. However, just to ensure consistency, the auditor randomly selected 10 incidents and reviewed the corresponding body-worn camera footage. There was no handcuffing or searching found in any of the video footage.

FINDING 4

The consistency of incident/report numbers documented on body-worn camera video file footage

Ninety-five percent of the body-worn camera video files were properly labeled

There were 176 video files associated with the 96 randomly selected incidents. The auditor found 167 (95%) video files were properly labeled and nine (5%) video files were not. For all cases, body-worn camera footage was found and available to review. There were two video files labeled incorrectly; however, the auditor successfully located the files by reviewing all the video file footage for the two officers on the date the incident occurred. Upon finding the videos the auditor noted that the labels were incorrect because one of the digits in the incident number was incorrect. In addition, there were seven video files associated with four incidents that were not labeled (i.e. blank); however, the auditor successfully located the files by reviewing all the video file footage for the seven officers on the respective dates the incidents occurred.

Although not identified as an objective of this audit, the above findings determined that officers within this sample filmed discretionary encounters with body-worn cameras 100% of the time as required.

Conclusion

OIG hypothesized that stop data errors would be more likely found within the categories of data we identified for review. For instance, the 24% error rate discussed within the first finding of this report should not be interpreted as if the entirety of the Department's handcuffing rates may similarly be afflicted with error. Instances of handcuffing a person without searching them are extremely rare as many of the circumstances allowing or necessitating the use of handcuffs also support and justify a search. Within the aggregate of OPD stop data, this scenario occurs in about 0.006% of all documented incidents. In other words, error rates are believed to be high within this set of circumstances, but these circumstances rarely occur.

Conversely, the typical OPD stop is one in which a person is neither searched nor handcuffed (approximately 63% of all stop data scenarios). The random small sample review of PDRD footage associated with this more common scenario did not reveal any compliance issues. OIG is now more closely examining incidents in which officers mistakenly over-reported the use of handcuffs within stop data. Any identifiable trends, patterns, or causes will be shared with the Office of Chief of Police and executive commanders. Our current review will also include recommendations for appropriate follow-up in cases where errors were attributed to repeat officers, reviewing supervisors, squads, or command.

Review of Stop Data Intelligence-Led Stops Audit

By Aaron Bowie, Police Officer

Objective

The purpose of this analysis was to verify the accuracy of officers using the intelligence-led factors category appropriately. Also, to determine if the intelligence-led factor that was selected was properly articulated in the report.

Background

On October 11th, 2016, OIG conducted an audit to focus on the intelligence-led factors within the stop data form.

After the Stanford Stop Data Analysis Report, was released on June 15, 2016, a focus group made up of officers from a wide cross section of assignments was created. The focus group was formed to help the Department and the Stanford gain critical insight, feedback and direction from officers on the implementation of recommendations contained in the Report.

The focus group came up with the fields “intelligence-led stop” to capture when these types of stops are made and “intelligence-led factors” to capture the sources of the intelligence. The intelligence-led factor included, Daily Bulletin, Communications Order, Civilian Notification, Law Enforcement Notification, Recent Crime Trends and Patterns, Weekly Priorities, Investigative Follow-Up, Other-Describe in Narrative, and Undercover and or Surveillance Directed.

Abilities to assess stop decisions and outcomes in comparison to the catalysts of suspect descriptions, crime rates, criminal intelligence and crime trends require important data sets. Past reviews of stop data

categorized as “intelligence-led” revealed significant inconsistencies. Past assessments have described the error rate as generally exceeding 20 percent.

Key Findings

- ✓ This sample review discovered 3 of 39 intel-led stop narratives where there was insufficient articulation of Intelligence factors (7.7% error rate).

Review and Findings

OIG reviewed Intelligence-Led stop factors for two separate periods. First, OIG collected a random sample of 239 total stops occurring within the time frame of October 11, 2016 to January 19, 2017 of which 39 Intelligence-Led stops existed. The 39 intelligence-led stops were reviewed and found to be sufficiently articulated and properly categorized as being intelligence-led (100% compliance).

OIG additionally conducted a sample collection for stops occurring during the timeframe of November 20th, 2017 to December 12th, 2017. There were 601 total stops of which 240 Intelligence-Led Stops were documented. OIG reviewed 82 of the 240 intel-led stops and found 79 (96.3%) to be sufficiently articulated.

Although these were relatively small samples which may not equate to statistical significance, multiple stops were randomly pulled from different periods. The consistent and improved results may reflect positively on recent retraining efforts and supervisory reviews of stop data. OIG and Department staff continue to evaluate stop data monthly to monitor standards of accuracy and consistency.

Summary: Audit of Community Policing Problem-Solving Project Database

By Rebecca Johnson, Police Performance Auditor

Objective

Evaluate the Oakland Police Department's use of the, the data collection and reporting tool used for community policing problem-solving projects (SARAnet™ Database Management System).

Key Weaknesses

- ✖ SARA (Scanning, Analysis, Response, and Assessment) problem solving projects are documented within the SARAnet Database but many projects remain dormant while other projects are opened or closed without documentation of all steps of the problem-solving process being completed.
- ✖ Training and instructional material should be improved and provided: OPD's policies and procedures, the SARAnet™ Manual and database functionality are not comprehensive and therefore silent in informing users of mandatory information to be completed in each data field, the relationships between data fields, and how often entries should be made.

Key Recommendations

- OPD should revise existing policies and procedures to ensure users of SARAnet™ are advised of the mandatory information to be completed in each data field, the relationships

between data fields, and how often entries should be made in each section.

- OPD should ensure the SARAnet™ Manual and database reflect the revisions, distributing the manual to all users.
- Training should be provided to all users of SARAnet™.

References

1. Bureau of Field Operations Policy and Procedure Manual Policy 11-01, *[Community Resource Officer] Deployment and Responsibilities*, dated May 27, 2011
2. Training Bulletin III-A.5, *Community-Oriented Policing*, effective August 20, 2008
3. OPD SARAnet™ Manual, created by RDA, updated March 21, 2017

Update

Since originally communicating the results of this review to Department staff, work has begun to arrange training for all Community Resource Officers, the SARAnet™ manual has been provided to training coordinators, and the task of updating the governing Department Policy and Procedure regarding Community Resource Officer projects has been tasked to the Bureau of Field Operations by the Office of Chief of Police.

Audit of Community Policing Problem-Solving Project Database

Overview

The Oakland Police Department (OPD) Office of Inspector General initiated an audit to evaluate the efficiency of the OPD's SARA Database Management System. The auditor reviewed community policing projects opened or closed between January 1, 2016 and September 30, 2017 to inspect the data fields completed by officers when working on community policing problem solving projects. The purpose of the audit was to assess quantitative and qualitative data regarding how the system is used and to propose solutions, where appropriate, that may aid in the Department's ability to enhance its use of the system.

Background

The Oakland Police Department utilizes problem solving as its main method of implementing its community policing vision, which is to identify recurring incidents and neighborhood concerns that generate calls for service to reduce crime and to improve the quality of life. To accomplish the vision, police officers are required to analyze recurring problems and neighborhood concerns, implement solutions to the problems/concerns, and evaluate the effectiveness of the implemented solutions over time. This is achieved by using the problem-solving process of Scanning, Analysis, Response, and Assessment (SARA). Table 1 provides a brief synopsis of each stage of the process:⁷

Table 1

Scanning	Personnel identify the location and condition(s), problem, parties involved, and crimes involved, if any.
Analysis	Personnel gather detailed information about the problem and work to understand the problem's scope, nature, and cause.
Response	Personnel implement a solution. Implementation may involve separating a large problem into smaller, more manageable parts.
Assessment	Personnel evaluate the solution to determine overall effectiveness and sustainability and assess what can be done differently in the future.

The OPD utilizes an electronic data collection and reporting tool called SARAnet™ to document problem-solving projects. Using the software, each identified recurring problem and/or neighborhood concern is opened as a project and given a unique project number. The software is designed to allow police officers to record their use of the SARA problem solving process by entering the analysis of the problem/concern; the implementation of solution(s) to the problem/concern; and the evaluation of the effectiveness of the implemented solution(s) over time. In addition, supervisors have authorization to formally close a project. The software includes a recordkeeping system for all open and closed projects.

Methodology

To accomplish the audit objective, the auditor took the following steps:

⁷ Training Bulletin III-A.5, pg. 3

1. Evaluated the quantitative data for the following data fields for open and closed SARA projects:
 - a) The use of the SARA process. The auditor considered any information typed in the Scanning, Analysis, Response, and Assessment sections in compliance as long as it related to the documented problem/concern.
 - b) If the project is/was open for more than 90 days, documented entries show that the problem is/was actively monitored and/or assessed each quarter;
 - c) The beat (location of project);
 - d) Problem identification source (how did the officer become aware of the issue, i.e. calls for service, Neighborhood Crime Prevention Council, crime hot spot, etc.);
 - e) The types of community problems identified; and
 - f) For each *closed* project, the auditor sought the information (a-e), including a documented *assessment* (was solution to the problem effective and sustainable?) and a reason for the closure.
2. Assessed the data fields in the SARA Database Management System.
3. Assessed the direction given via policies and/or procedures to users of the SARA Database Management System.

Population/Sample

The population consisted of 146 projects open and/or closed January 1, 2016 to September 30, 2017. Open and closed projects were reviewed separately; therefore, if a project closed while reviewing the open projects, the auditor removed it from the population. In addition, if a project was opened/closed and all SARA data fields were empty, it was also removed from the population. At the time of the audit, the population reviewed for open and closed projects were as follows:

Category	Population	Not Applicable	Applicable	Comments
Open	76	5	71	One project closed while reviewing open projects and therefore removed from population Four projects in which there were no entries in the SARA data fields
Closed	70	4	66	Four projects in which there were no entries in the SARA data fields

FINDINGS

FINDING #1: SARA Process Used; However, Many Projects Appear to Lie Dormant (Considerable Time Lapses between Entries)

The auditor reviewed open and closed projects, and the results were as follows:

Open Projects

Data Field	Scanning	Analysis	Response	Assessment
No. of Projects	71	71	71	71

Data Entered	68	70	56	18
No Data Entered	3	1	15	53

Percentages

Data Field	Scanning	Analysis	Response	Assessment
No. of Projects	71	71	71	71
Entries	96%	99%	79%	25%
No Entries	4%	1%	21%	75%

The auditor reviewed 71 projects to determine if documented entries show that the problem is actively monitored and/or assessed each quarter. The auditor found four projects that were in open status but were waiting for a supervisor to close. These projects were left in an open/un-reviewed state for an average of 182 days.

In the remaining 67 projects, the audit indicated that, as of December 21, 2017, there were 11 (16%) projects that included documented entries made every 90 days or less. However, there were 56 projects (84%) in which there was a time lapse of 91 days or more between entries. The lowest time lapse was 107 days and the highest was 712, resulting in the following statistics:

Closed Projects

Data Field	Scanning	Analysis	Response	Assessment*
No. of Projects	66	66	66	66
Data Entered	66	66	56	19
No Data Entered	0	0	10	47

*At minimum, the assessment for closed projects had to include whether solution to problem was effective and sustainable.

Percentages

Data Field	Scanning	Analysis	Response	Assessment
No. of Projects	66	66	66	66
Data Entered	100%	100%	85%	29%
No Data Entered	0%	0%	15%	71%

The auditor reviewed 66 closed projects to determine if documented entries show that the problem was actively monitored and/or assessed each quarter, and the audit indicated that there were 32 (48%) projects that included documented entries made every 90 days or less. However, there were 34 projects (52%) that included entries with a time lapse of 91 days or more. The lowest time lapse was 103 days and the highest was 537, resulting in the following statistics:

Additional Observations

Appendices A and B provide statistics related to how long projects remain open; projects per beat; the nature of problems as documented in SARANet™; and the problem identification sources as documented in SARANet™.

FINDING #2: The Control Environment Is Insufficient and Requires Improvement

The auditor reviewed the OPD's policies and the SARAnet™ Manual and database, and noted that the available instructions in the documents and software are not comprehensive and therefore silent in informing users of mandatory information to be completed in each data field, the relationships between data fields, and how often entries should be made.

The Software

The *Scanning Section* includes the following data fields: (1) the specific problem; (2) where the problem occurs; (3) when the problem occurs; (4) reasons the problem continues to be a problem; (5) the stakeholders; (6) causes of the problem; and (7) **the tentative goal**. The tentative goal data field is not always complete and there is no policy or procedure that mandates completion.

The *Analysis Section* includes the following data fields: (1) the scope of the problem; (2) the sources/nature of the problem; (3) the consequences of the problem; (4) the root causes of the problem; (5) how has this problem been addressed in the past; (6) **analysis goals, which includes data field(s) for the measurements for the goal's achievement**; and (7) the **analysis log**. The analysis goals data field relates to the tentative goal data field in the Scanning Section. Most times this section is not complete and there is no policy or procedure that mandates completion. In addition, the auditor was unable to determine what information should be included in the analysis log data field and there is no policy or procedure that explains the data field or mandates its completion.

The *Response Section* includes the following data fields: (1) **Response Plan, which includes data field for the task, task measurement, lead agency, responsible person, due data, status, and notes**; and (2) **response log**, which includes data field for the date, notes, related tasks, and attachments. The response plan data field relates to the analysis goals and tentative goal data fields; however, in most cases, this section is not completed and there is no policy or procedure that mandates its completion. In addition, the auditor was unable to determine what information should be included in the response log and there is no policy or procedure explains the data field or mandates it completed. The auditor did note that the response log data field is primarily completed. It is the data field in which the police officer documents the work (i.e. Patrol security checks; whether complaints have increased or decreased; contacting property owner; etc.) conducted to resolve the issue/concern.

The *Assessment Section* includes the following data fields: (1) **assessment plan**, which includes a data field to note frequency of assessment, location, required attendees, and data required to conduct process and impact measurements; and (2) **assessment log**, which includes data fields for data, time, location, attendees, process evaluation, impact evaluation, next steps, and attachments. The assessment plan and assessment log data fields relate to the Response Section, but most times these sections are not completed. The auditor was unable to determine the data field should be used since there is no policy or procedure to explain the data fields and their use. Should the police officer complete this section after each response to resolve the issue/concern or should he/she wait until the end of the project?

Additional Observations

The auditor noted the following issues with the available policies, procedures, and SARAnet™ Manual and software:

Training Bulletin III-A.5, *Community-Oriented Policing*, effective August 20, 2008

- States “officers assigned to the patrol function are available for problem-solving assignments and are minimally required to initiate their own projects one to three times per year.” However, the number of open (71) and closed (66) projects in this audit is not reflective of each Patrol officer initiating one to three projects per year.

Bureau of Field Operations Policy and Procedure Manual Policy 11-01, [*Community Resource Officer*] *Deployment and Responsibilities*, dated May 27, 2011

- States [CROs] shall...research and identify the three locations generating the highest calls for service on their community policing beat; as appropriate, open projects aimed at reducing these calls for service. In addition, states identify the most critical problem property on their community policing beat; open project aimed at abating problems associated with the property. However, based on the “Problem Identification Source(s) as documented in SARAnet™ (see Appendices A and B), *Citizen Complaints* appear to be the main source of problem identification.

Neither the Training Bulletin nor Policy 11-01 has been updated since Community Resource Officer roles and responsibilities may have adjusted from the former position of Problem Solving Officer. Similarly, specific training pertaining to community policing and problem solving processes and best practice has not been provided by the Department since 2014.

OPD SARAnet™ Manual, created by RDA, updated March 21, 2017

- User manual not distributed to all employees and therefore not uploaded in OPD’s policy management system.
- Does not incorporate OPD’s policies and procedures informing users of mandatory documentation, best practices, or requirements as mandated by policy and procedure.
- Difficult to determine how OPD initially becomes aware of a problem because the “Problem Identification Source(s)” allows the user to add multiple sources and not necessarily in the order received. Also, “Blight” should not be a source of problem identification since it is a condition rather than a source of information.
- A review of the 66 closed projects indicated that the documented “Reasons for Closure” selected by supervisors needs to be improved. The auditor was unable to determine the significance of Reason 2 and Reason 3. The reasons for closure were as follows:

Reason for Closure	No.	Percentage
Abated	34	52%
Reason 1 Loitering in the evening and burglaries have decreased, recommend closure.	5	8%
Reason 2	20	30%
Reason 3	7	11%
Total	66	100%

SARAnet™ Software

- The system includes the names of employees no longer employed with OPD.
- There is no response when employees click on “Help.”
- There is no response when employees click on “About S.A.R.A.”
- “Information to Help You” section offers no instruction or guidance material.
- Using the “More” dropdown arrow, when employees click on “Import helpful hints, a box is displayed. Clicking on “Import” gives employees a message that states “no JSON file selected.”
- There were 66 closed projects, and the system indicated that 30 (45%) of them included assessments. The auditor’s review of the projects’ assessments found that only 18 (27%) of them included sufficient wording indicating the officer was closing out the project. The disparity in the system’s output and the auditor’s review is due to the system not having a feature that is reserved for closing out a project. It simply acknowledges any words written in the Assessment Log section.
- No data field exists for a supervisor to write a comment on a project.

Findings and Recommendations

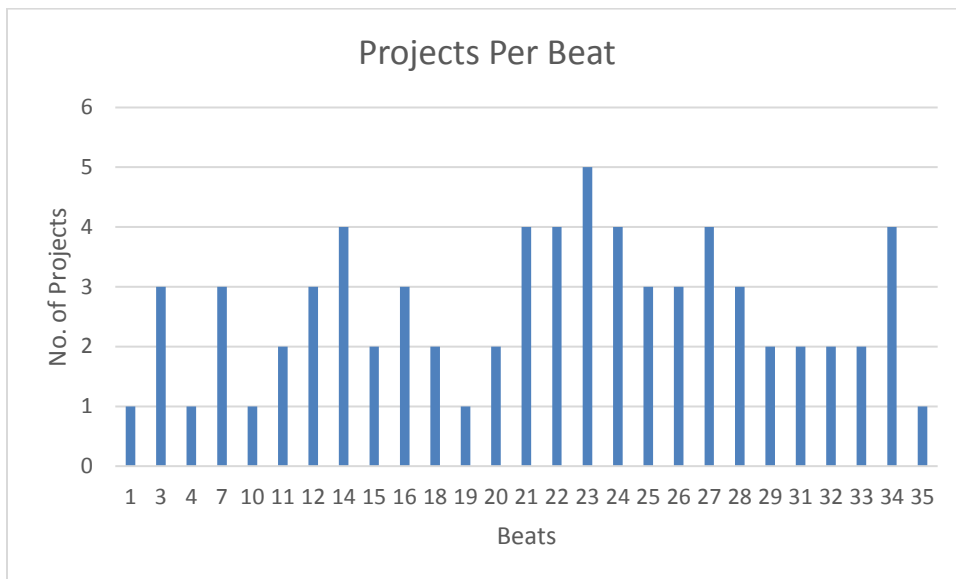
	OIG Findings	OIG Recommendations
1	<p>The SARA process is used, but many projects appear to lie dormant as evidenced by considerable time lapses between entries.</p> <p>The control environment is insufficient and requires improvement: OPD’s policies and procedures, the SARAnet™ Manual and the database are not comprehensive and therefore silent in informing users of mandatory information to be completed in each data field, the relationships between data fields, and how often entries should be made. The SARAnet database itself appears to offer the ability to provide guidance on the use of certain fields but the guidance functionality appears incomplete.</p>	<p>OPD should revise existing policies and procedures to ensure users of SARAnet™ are advised of the mandatory information to be completed in each data field, the relationships between data fields, and how often entries should be made in each section.</p> <p>OPD should ensure the SARAnet™ Manual and database reflect the revisions, distributing the manual to all users. Subsequently, training should be provided to all users of SARAnet™.</p> <p>Note: <i>Community policing obviously and essentially requires community collaboration. OIG recommends to include a best practice within training and/or procedure to advise and inform community members (NCPC or other groups/associations) of SARAnet project results and the value their Community Resource Officers and patrol teams bring to their communities.</i></p>

APPENDIX A

(OPEN PROJECTS)

At the time of review on December 15, 2017, the number of days the projects remained open was as few as 84 days to as many as 708 days, resulting in the following statistics:

Category	Number
Mean	409
Median	562
Mode	317
Range	624



Nature of Problem as Documented in SARAnet™	No.	Percentage
ABANDONED AUTO	3	4%
ABANDONED HOUSE	3	4%
AGGRESIVE PANHANDLING	1	1%
BLIGHT	7	10%
BURGLARY	1	1%
BURGLARY - Locked Auto	1	1%
BURGLARY - Residential	1	1%
CALLS FOR SERVICE	1	1%
CRIME PREVENTION	1	1%
DISTURBING THE PEACE	3	4%
GANG	3	4%

HOMELESS ENCAMPMENT	6	8%
NARCOTICS	12	17%
OTHER	4	6%
ROBBERY	1	1%
SHOOTINGS	1	1%
SQUATTERS	4	6%
SUSPICIOUS PERSON	1	1%
TRAFFIC	8	11%
No Entry in Data Field	9	13%
Total	71	100%

No.	Problem Identification Source(s) As Documented in SARAnet™	No.	Percentage
1	Blight	1	1%
2	Citizen Complaints; Blight	15	21%
3	Citizen Complaints; Crime Analysis	1	1%
4	Citizen Complaints; NCPC Priority	2	3%
5	Citizen complaints; NCPC Priority PSO Observation	1	1%
6	Citizen complaints; NCPC Priority; OPD General Calls for Services	1	1%
7	Citizen Complaints; NCPC Priority; OPD General Calls for Services; OPD direction-Patrol Officer; PSO Observation; Blight	1	1%
8	Citizen Complaints; NCPC Priority; OPD General Calls for Services; OPD Drug Arrest; Blight	1	1%
9	Citizen Complaints; NCPC Priority; OPD General Calls for Services; PSO Observation	1	1%
10	Citizen Complaints; NCPC Priority; PSO Observation; Blight	3	4%

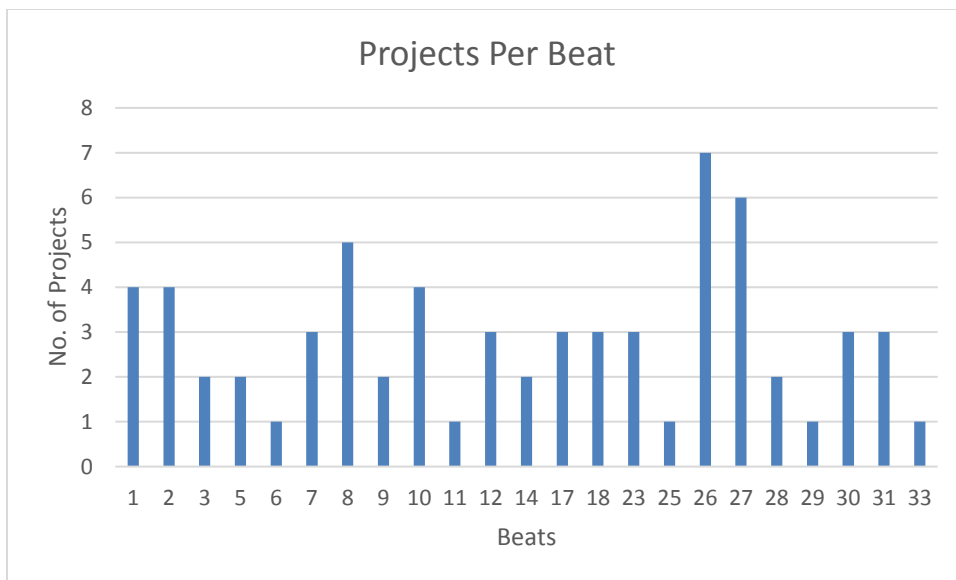
11	Citizen Complaints; OPD direction-Area Commander	1	1%
12	Citizen complaints; OPD Direction-Special Resource Lieutenant; PSO Observation	1	1%
13	Citizen Complaints; OPD Drug Hotline Calls; Search Warrant; Blight	1	1%
14	Citizen Complaints; OPD General Calls for Services	2	3%
15	Citizen Complaints; OPD General Calls for Services; OPD Drug Hotline Calls	1	1%
16	Citizen Complaints; OPD General Calls for Services; PSO Observation	2	3%
17	Citizen Complaints; PSO Observation; Blight	15	21%
18	Crime Analysis	1	1%
19	Crime Analysis; OPD General Calls for Services	1	1%
20	NCPC Priority	2	3%
21	No entry in data field.	11	15%
22	OPD General Calls for Services; PSO Observation; Blight	3	4%
23	PSO Observation	3	4%
	Total	71	100%

APPENDIX B

(CLOSED PROJECTS)

The audit indicated that the closed projects had been opened as few as 13 days to as many as 657 days, resulting in the following statistics:

Category	Number
Mean	216
Median	173
Mode	47
Range	644



Nature of Problem as Documented in SARAnet™	No.	Percentage
Abandoned Auto	4	6%
Abandoned House	2	3%
Alcohol	2	3%
Blight	6	9%
Burglary	1	2%
Calls for Service	1	2%
Disturbing the Peace	8	12%
Homeless Encampment	13	20%
Narcotics	9	14%
Other	3	5%
Prostitution	4	6%
Robbery	1	2%

Squatters	2	3%
Traffic	7	11%
Vandalism	1	2%
Weapons	1	2%
No Entry in Data Field	1	2%
Total	66	100%

No.	Problem Identification Source(s) As Documented in SARAnet™	No.	Percentage
1	Citizen Complaints	16	24%
2	Citizen Complaints; PSO Observation	12	18%
3	PSO Observation; Blight	6	9%
4	Citizen Complaints; OPD-General Calls for Services PSO Observation; Blight	5	8%
5	Citizen Complaints; NCPC Priority	4	6%
6	Citizen Complaints; NCPC Priority; PSO Observation	4	6%
7	UTD--no entry in data field	2	3%
8	Citizen Complaints; OPD General Calls for Services; Blight/Drug Arrest	2	3%
9	OPD Direction-Special Resource Lieutenant	2	3%
10	Citizen Complaints; Crime Analysis; NCPC Priority; PSO Observation	1	2%
11	Citizen Complaints; Crime Analysis; OPD Drug Arrest PSO Observation	1	2%
12	Citizen Complaints; NCPC Priority; OPD General Calls for Services; OPD direction-Area Commander; OPD direction-Special Resource Lieutenant	1	2%
13	Citizen Complaints; NCPC Priority; OPD General Calls for Services; OPD Drug Arrest	1	2%

14	Citizen Complaints; NCPC Priority; OPD General Calls for Services; PSO Observation	1	2%
15	Citizen Complaints; OPD direction--Special Resource Lieutenant	1	2%
16	Crime Analysis; OPD Direction-Special Resource Lieutenant	1	2%
17	Crime Analysis; OPD PSA Lieutenant	1	2%
18	NCPC Priority; OPD-General Calls for Service; PSO Observation	1	2%
19	NCPC Priority; PSO Observation; Blight	1	2%
20	OPD Direction-Area Commander	1	2%
21	OPD Drug Arrest	1	2%
22	Search Warrant	1	2%
Total		66	100%