

Recommendation 34.1

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[REDACTED]

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Dear Acting Captain Altorfer,

Our office has completed its review of the materials related to Recommendation 34.1 that were submitted to us as part of the collaborative reform process. This package focused on SFPD collecting stop data demographics. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

Recommendation 34.1: The SFPD should prioritize the collection, analysis, and reporting of all nonconsensual stop data, including pedestrian and non-motorized conveyances.

Response to 34.1: In July of 2018 SFPD implemented the Stop Data Collection System (SDCS), a web-based application to collect stop data. SDCS complies with the required collection data under the Racial and Identity Profiling Act (RIPA). SFPD supported the rollout of SDCS with training and guidance, such as the SDCS Web Application Manual. On May 31, 2018, SFPD issued Department Bulletin 18-105, "Stop Data Collection System Implementation," requiring officers to complete the training and review the guidance. In response errors discovered during audits on December 4, 2018, SFPD issued Department Bulletin 18-247, "SDCS Implementation," reminding officers of various data collection requirements. On October 7, 2020, SFPD re-issued Department Bulletin 18-247 as Department Notice 20-141.

The collection and review of stop data has been integrated as part of SFPD's strategic planning. On February 8, 2018, SFPD released its "Department Strategy 1.0." The report identified data collection as a strategic areas ("Measure Performance: Focus on Outcomes - collect, store and a analyze data to better serve our community and increase accountability and transparency"). Additionally, the SFPD Business Analyst Team (BAT) analyzes the stop data and provides thorough quarterly reports known as "96A" reports. And while not a part of this recommendation package, SFPD has formed a partnership with the Center for Policing Equity to analyze stop data and provide recommended reforms.

The BAT also conducts a review of the individual SDCS entries to ensure personal identifying information is not entered, and SFPD has begun an annual audit on other data entry fields. The BAT review was codified in Bureau Order 21-01, "Stop Data Collection System – PII Removal & Geocoding Procedures (January 5, 2021). The Order requires the BAT to review SDCS entries on a quarterly basis to remove personal identifying information, geocode, and geo-anonymize geographic locations. The annual audit reviews SDCS data for (1) personal identifying information, (2) failure to enter information in the narrative field, (3) the consistency of narrative fields with reason for the stop and search, and (4) errors in geocoding.

Cal DOJ had recommended that SFPD institute supervisory review of stop entries—such as having sergeants review a randomized sample of completed stop forms of their officers—as this would provide for timely corrections for errors and aid in sergeants’ discussions with their officers regarding the elimination of biased policing and correcting other actions warranting corrective action. This recommendation would also ensure consistent data is produced within all precincts within San Francisco. SFPD has resisted this recommendation out of concern for sergeants’ time and has created the above noted alternative auditing approach. While this is not Cal DOJ’s preferred approach—it does not provide direct supervisors with additional insights into their officer’s day-to-day policing and does not ensure timely corrections or feedback for individual officers that would provide consistent generation of data within SFPD—it is substantially compliant with the recommendation.

Based upon all of the above, the Department of Justice finds that SFPD is in substantial compliance with this recommendation. Please let us know if you have any questions or would like to discuss further. Thank you.

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Finding # 34: The SFPD does not routinely collect or analyze data on stops involving pedestrian and non-motorized conveyances.

Recommendation # 34.1 The SFPD should prioritize the collection, analysis, and reporting of all nonconsensual stop data, including pedestrian and non-motorized conveyances.

Response Date: 10/20/2020

Executive Summary:

The San Francisco Police Department (SFPD) has implemented the use of the California Department of Justice's (DOJ) Stop Data Collection System (SDCS) to collect stop data in compliance with this recommendation. All SFPD members have been trained and re-trained to use the SDCS system and on the data entry requirements outlined by the DOJ. Additionally, the SFPD has instituted internal processes to ensure that the SFPD data entered and reported to the DOJ remain consistent and follow the guidelines set forth by the SDCS Program. The specific responses to each of the compliance measures below highlight the actions SFPD has taken to prioritize the collection, analysis and reporting of all nonconsensual stop data.

Members of the San Francisco Police Department (SFPD); Professional Standards Unit participate in conference calls with Hillard Heintze and the California Department of Justice (Cal DOJ) for the purpose of recommendation prescreening. The SFPD prescreened Bias Recommendation 34.1 on 7/09/20. For completion of this recommendation, the following suggestions were made by Cal DOJ and Hillard Heintze. These suggestions were communicated in writing on 07/09/20 by Cal DOJ as a result of this prescreen meeting:

"For both 34.1 and 34.2, our concerns were with SFPD's ongoing review/continual improvement loop. The existing package references a data cleaning and quality assurance process (Attachments 3 and 11). Cal DOJ recommended SFPD provide more detail about the scope of this process and specifically wanted assurance that SFPD is checking for discrepancies and deficiencies in the various stop data entry fields. We all agreed that SFPD has the capability to review stop data entries before they are submitted to Cal DOJ and that, as part of any review and in addition to the existing process of scrubbing the data of identifying information, SFPD could compare the open narrative fields to the responses in other fields to make sure they are consistent. However, an open question is the scope of SFPD's review of stop data entries, who would conduct that review, and the frequency of that review. Some ideas that were brought up would be for sergeants to periodically review a day's worth of stop data entries prior to submission to Cal DOJ (by turning on the supervisory-review function on the Stop Data Collection System for a day), having sergeants review a small sample of entries (i.e. 10) at some regular frequency (i.e. quarterly) prior to submission (if that is possible), or having sergeants or PSPP review a sample of already submitted stop data entries. The purpose of any form of review would be to check for deficiencies and discrepancies, and to the extent needed, provide for remedial action or retraining



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for specific officers, or policy or training changes for the entire Department. also noted that SFPD should have some policy or statement requiring some form of remedial or supportive action if there are deficiencies and discrepancies in an officer's stop data entries, which would support compliance measure 4 of 34.1.

In response to the requests made by Hillard Heintze and Cal DOJ at the prescreen meeting, the SFPD conducted an audit of SDCS stop data. After completing this SDCS audit, the SFPD updated training on the SDCS by releasing a Department Notice. This audit and update in training are described below under Compliance Measures 3 and 4.

Compliance Measures:

1. Establish a data collection plan to prioritize data collection for all reportable stops in keeping with AB 953 requirements.

In July 2018, the SFPD instituted the use of the DOJ's SDCS System (See Attachments 1: Department Bulletin 18-105 SDCS Implementation and 2: Department Bulletin 18-247 SDCS Implementation Supplement). The SDCS is a web-based application developed by the DOJ to carry out the requirements set forth by California State Assembly Bill (AB) 953 (2015). As part of the department's quality assurance process, the SFPD Business Analysis Team (BAT) in the Professional Standards and Principled Policing (PSPP) Unit monitors and analyzes the stop data on a continuous basis to ensure the sufficiency and accuracy of the data submitted to the DOJ (See Attachments 3: PSPP Data Cleaning Process and 4: 2019 4th Quarter Stop Data Report to DOJ).

2. Train officers and supervisors on data collection responsibilities.

As part of the police academy training, police recruits receive hands-on training by academy trainers on proper data entry requirements as outlined by the DOJ (See Attachments 5: Academy Training Schedule-SDCS and 5: SDCS Web Application Manual). In May 2018, the department provided the District Station Training Coordinators—in a "train-the-trainer" model—the training information needed via email to act as subject matter experts on how to properly enter information into SDCS (See Attachments 7: SDCS Training Rollout Email 2018 and 8: SDCS Training Rollout Email 2019). In addition to the Department Bulletins that outline the data entry requirements of the SDCS program (See Attachments 1: Department Bulletin 18-105 SDCS Implementation and 2: Department Bulletin 18-247 SDCS Implementation Supplement), members in the field can seek guidance from their assigned training coordinators or supervisors to assist with any further questions.

3. Evidence of ongoing review/continual improvement loop.

After SFPD's initial implementation of the SDCS program (See Attachments 1: Department Bulletin 18-105 SDCS Implementation and 7: SDCS Training Rollout Email 2018), the department identified data entry issues that were incompatible with the SDCS Program requirements (i.e. entering Personal Identifiable Information (PII), entering exact addresses



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instead of nearest intersection, etc.). As a result of this discovery, SFPD implemented an ongoing review and data cleaning process to ensure that the information SFPD officers enter is correct in the SDCS system (See Attachment 3: PSPP Data Cleaning Process).

As part of the SFPD's continual improvement process, SFPD issued additional guidance to members on the proper data entry requirements to improve the accuracy of the department's data collection and reporting efforts (See Attachments 2: Department Bulletin 18-247 SDCS Implementation Supplement and 8: SDCS Training Rollout Email 2019). Sergeants and officers were required to sign-off on Department Bulletin 18-105: SDCS Implementation and Department Bulletin 18-247 SDCS Implementation Supplement to acknowledge that they understood the SDCS requirements (See Attachments 9: DB 18-105 Audit Report as of 5.6.20 and 10: DB 18-247 Audit Report as of 5.6.20).

In July 2020, SFPD consulted DOJ and Hillard Heinze seeking additional guidance on how the department can comply with this recommendation. In response, the department has instituted an annual audit program of the SDCS entries to determine compliance with the SDCS Program requirements (See Attachments 11: SDCS Memo and 12: SDCS Audit of September 2020).

4. Evidence of supportive and remedial action if deficiencies are found.

After SFPD's initial implementation of the SDCS program (See Attachment 1: Department Bulletin 18-105 SDCS Implementation and 7: SDCS Training Rollout Email 2018), the department identified data entry issues that were incompatible with the SDCS Program requirements (i.e. entering Personal Identifiable Information (PII), entering exact addresses instead of nearest intersection, etc.). As a result of this discovery, SFPD implemented an ongoing review and data cleaning process to ensure that the information SFPD officers enter is correct in the SDCS (See Attachment 4: PSPP SDCS Data Cleaning Process).

As part of the SFPD's continual improvement process, SFPD issued additional guidance to members on the proper data entry requirements to improve the accuracy of the department's data collection and reporting efforts (See Attachments 2: Department Bulletin 18-247 SDCS Implementation Supplement and 8: SDCS Training Rollout Email 2019). After the issuance of this additional guidance, the rate at which PSPP needs to clean the data entry errors has reduced from 6.1% in the 3rd Quarter 2018 to 0.6% in the 1st Quarter 2020 (See Attachment 13: PSPP SDCS Program Data Quality Assurance Results).

Additionally, the annual SDCS Audit performed in September 2020 shows some regression in SFPD's compliance with the SDCS Program data entry requirements (See Attachments 11: SDCS Memo and 12: SDCS Audit of September 2020). In response, SFPD issued Department Bulletin 20-141 Stop Data Collection System as a corrective action to retrain and instruct members of the SDCS Program data entry requirements (See Attachment 14: DN 20-141 Stop Data Collection System).



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UPDATE 1.5.2020:

After completion of this recommendation, the SFPD Business Analysis Team (BAT) formalized the process of data cleaning for SDCS stop data with the issuance of a Bureau Order. This Bureau Order described how the BAT team is able to correct PII data entry errors through a process of data cleaning involving geographic re-coding to the nearest intersection when address information is entered incorrectly. (See Attachment 15: Strategic Management Bureau Order # 21-01; PII Removal & Geocoding Procedures).