



## Recommendation 35.2

Gabriel Martinez [Redacted]

Tue 1/5/2021 10:22 AM

[Redacted]

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Dear Acting Captain Altorfer,

Our office has completed its review of the materials related to Recommendation 35.2 that were submitted to us as part of the collaborative reform process. This package focused on SFPD reviewing its technological gaps and integrating data solutions into management practices. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

Recommendation 35.2: The SFPD should analyze its existing technology capacity and develop a strategic plan for how data are identified, collected, and used to advance sound management practices.

Response to 35.2: SFPD has conducted internal assessments and procured outside consultants to assess its technological gaps. In 2019, SFPD conducted a detailed 2019 Portfolio Assessment, specifying the types of systems currently in use, the desired technological state, a description of the gap, and an analysis of the costs to close the gap. SFPD also analyzed its technological requests as part of a ten-year plan, including budgets for technology projects through 2022.

SFPD also retained LE Innovations Inc. as an outside consultant to analyze SFPD technology. On August 30, 2019, LE published an independent assessment of the IT Division's current state, identified technology gaps, and made recommendations to ensure that the IT Division can support the needs of the department. One of the technological needs identified during the gap analysis was creating a dashboard with officer information provided in part from stop data and use-of-force data that would facilitate a review for biased policing. SFPD has requested funding for the dashboard as part of its annual budget for the past three years.

Regarding SFPD's technology on stop data, in July of 2018 SFPD implemented the Stop Data Collection System (SDCS). SDCS complies with the required collection data under State Assembly Bill AB 953 (RIPA). SFPD supported the rollout of SDCS with training and guidance, such as the SDCS Web Application Manual. Department Bulletin 18-247 (revised 18-05), "SDCS Implementation," required officers to complete the training and review the guidance.

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.



[REDACTED]

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. 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 biased policing. SFPD has resisted this recommendation out of concern for sergeants' time and has created the alternative auditing approach. While this is not Cal DOJ's preferred approach, 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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<b>Finding # 35</b>	<b>The SFPD does not have sufficient systems, tools, or resources needed to integrate and develop the appropriate data required to support a modern, professional police department.</b>
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<b>Recommendation # 35.2</b>	The SFPD should analyze its existing technology capacity and develop a strategic plan for how data are identified, collected, and used to advance sound management practices.
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<b>Recommendation Status</b>	<table style="display: inline-table; vertical-align: middle;"> <tr> <td style="background-color: yellow; padding: 2px;"><b>Complete</b></td> <td style="padding: 2px;"><b>Partially Complete</b></td> <td style="padding: 2px;"><b>In Progress</b></td> </tr> <tr> <td style="padding: 2px;"><b>Not Started</b></td> <td style="padding: 2px;"><b>No Assessment</b></td> <td></td> </tr> </table>	<b>Complete</b>	<b>Partially Complete</b>	<b>In Progress</b>	<b>Not Started</b>	<b>No Assessment</b>	
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**Summary**

The department conducted a technology needs assessment which led to the development of a five-year Information Technology Strategy and Road Map. The strategy focused on the technology needs of the entire department and was informed by recommended practices in the profession with input from internal and external stakeholders. The strategy includes a business intelligence model that includes a process for requesting and evaluating new technology requests, a practice consistent with recommended practices in the profession.

The department’s technology capacity is sufficient to support the identification and collection of stop data pursuant to California Assembly Bill 983 Racial and Identity Profiling Act (RIPA). In addition, the department’s Business Analysis Team evaluates RIPA and other data to inform leadership and management decisions.

The department’s response to this recommendation is designated complete. The team will monitor the department to ensure these practices are institutionalized.

Compliance Measures	Status/Measure Met
1 Evidence of review of technology capacity.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2 Develop strategic plan that details how stop data is <ul style="list-style-type: none"> <li>• Identified</li> <li>• collected</li> </ul>	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3 Establish and implement plan to advance sound management practices.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

**Administrative Issues**

**Compliance Issues**



## Collaborative Reform Completion Memorandum

**Finding # 35:** The SFPD does not have sufficient systems, tools, or resources needed to integrate and develop the appropriate data required to support a modern, professional police department.

**Recommendation # 35.2** The SFPD should analyze its existing technology capacity and develop a strategic plan for how data are identified, collected, and used to advance sound management practices.

**Response Date: September 3, 2020**

### Executive Summary:

Following the October 2016 Department of Justice Collaborative Reform Initiative recommendations, the department conducted an integral gap analysis of its IT environment, see **Attachment #1: IT Systems Need and Gap Analysis**. The department followed this up by contracting with an outside consultancy firm to conduct an independent assessment of its existing IT environment.

In 2018, the department moved from its existing stop data collection, conducted through the E-Stop system, to the DOJ Stop Data Collection System, ensuring compliance with State Assembly Bill AB953. This move ensured compliance with the identification and collection of stop data. In addition, the SFPD Business Analysis Team (BAT) monitors stop data on an on-going basis to ensure the sufficiency and accuracy of the data collected.

In 2018 the department released **Attachment #2: San Francisco Police Department Strategy 1.0**, which committed the department to ensuring accurate collection of stop data to better serve our communities, increase accountability, and uphold our commitment to policing without bias. In 2019 the department created an IT Steering Committee to ensure that the department's IT environment continues to meet these objectives as well as the challenges of 21<sup>st</sup> century policing. The department continues to move towards the development of a personnel dashboard to assist supervisors in identifying bias, and has included the need for funding this initiative in its annual budget requests on a yearly basis since the 2017/2018 fiscal year budget cycle. While that budget need has not yet been met by the city, the department continues to include this dashboard as a part of our strategic planning process.



## Collaborative Reform Completion Memorandum

### Compliance Measures:

#### 1) Evidence of review of technology capacity

In response to the Department of Justice (DOJ) recommendations that the department analyze its existing technology capacity, the department conducted an internal gap analysis of its existing technology environment **Attachment #1: IT Systems Need and Gap Analysis**. The department incorporated data from that gap analysis into its **Attachment #3: Five Year IT Strategy and Road Map**, which has been continually updated, on an annual basis, to align strategic IT goals with changing needs. The department also contracted with an outside consultant, LE Innovations, Inc., to conduct an independent assessment of the state of the departments existing technology, equipment, and related IT resources. The assessment examined the **Attachment #1 IT Systems Need and Gap Analysis**, **Attachment #3 Five Year IT Strategy and Roadmap**, and conducted interviews with IT staff and end users.

The results of the assessment and recommendations resulting from it were compiled in **Attachment #4: San Francisco Police Department IT Assessment and Recommendations**. The recommendations included the following:

- Facilitating continued Business Intelligence efforts to enable data driven policing
- Realign IT objectives with overarching SFPD Strategic Initiatives
- Ensure all IT projects are prioritized by the Executive Steering Committee

Additionally, in 2019 the department conducted an audit of all IT systems and compiled an inventory of all IT systems which were listed in **Attachment #5: All SFPD IT Systems 2019**.

#### 2) Develop strategic plan that details how stop data is

- **identified**
- **collected**

In July of 2018 the department implemented the Stop Data Collection System (SDCS) under State Assembly Bill AB953. The SDCS is a web based application developed by the Office of the Attorney General and California Department of Justice. The use of SDCS complies with AB953 which mandates a certain element of data to be collected as defined in appendix F. In addition, the SFPD Business Analyst Team (BAT) monitors and analyzes the stop data on an on-going basis to ensure sufficiency and accuracy of the in-put data related to stops.

To facilitate the rollout of SDCS the department created training and guidance through the issuance of:

- **Attachment #6: Department Bulletin 18-105; Stop Data Collection System (SDCS) Implementation**
- **Attachment #7: The Stop Data Collection Form**



## Collaborative Reform Completion Memorandum

- Attachment #8: SDCS Web Application Manual
- Attachment #9: SDCS data entry tips
- Attachment #10: AB953, RIPA Stop Data Regulations.

Per Attachment #6: Department Bulletin 18-105; Stop Data Collection System (SDCS) Implementation, members were to become familiar with the training materials no later than June 30<sup>th</sup>, 2018.

An ongoing review by the SFPD BAT Team in the way that SDCS data was entered revealed some consistent issues and created the need for an improvement loop. Therefore, SFPD members received an update on Attachment #6: Department Bulletin 18-105: Stop Data Collection System (SDCS) Implementation, by issuance of Attachment #11: Department Bulletin #18-247 Stop Data Collection System (SDCS) Implementation. This subsequent bulletin clarified the use of the SDSC. The SFPD continues monitor SDCS entry and train new members at the academy on the proper entry of data into the SDCS.

The SFPD Business Analyst Team (BAT) analyzes SDCS entries and completes a data cleaning process prior to summarizing said data in quarterly reports, such as Attachment #12: Chapter 96A Q2 2020 Report. This data cleaning was in response to incorrect entry of Personal Identifiable Information, or PII. The BAT team discovered that exact addresses were being entered vs. the nearest intersection. The updated training in Attachment #11: Department Bulletin #18-247 Stop Data Collection System (SDCS) Implementation, in addition to the data cleaning process (as described in Attachment #13: Data Cleaning Process) created a significant improvement loop in ensuring sufficient and accurate data collection.

Immediately after roll out of the SDCS, some deficiencies in entries to the SDCS were discovered by the SFPD, as described in Attachment #14: Department Wide Emails. As an improvement loop for this, emails were sent to all members describing corrective measures for entering data in the SDCS, and reminding members of available resources and training materials. As shown in the Attachment #14: Department Wide Emails, it is also noted that when the SDCS was first rolled out, it was only available on the department desktop computers. Shortly after rollout, however, a significant improvement loop was accomplished when the SFPD included the SDCS on department issued cell phones. This improvement allowed data entry for the SDCS on the member's work cell phones as an app, while in the field via the MDT or on station computers for ease of access and submission of data prior to the end of a members shift.

To ensure accuracy in data collection, the BAT team has the ability to audit training records to make sure members are up to date on SDCS related policy and training. Attachment #15, Audit Report for DB 18-105: Stop Data Collection System (SDCS) Implementation from 9/6/18 compared to 5/6/20 shows a significant improvement in the percentage of members who were trained on the SDCS. Sign-off for department



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bulletin 18-105 went from 87% in 2018 to 98% in 2020. Through this audit process it was determined the remaining 2% consists largely of members who are on military leave, family medical leave, disability leave, or suspension.

As part of the departments audit/review/improvement loop, the department conducted an audit of SDCS stop data. This audit focused on review of accuracy of the following SDCS fields:

1. Whether officers entered the subject's PII in the narrative portions of SDCS
2. Whether officers entered the identity of any officer, CAD number, citation number, incident number, or confidential investigative technique or source
3. Whether the descriptions entered by the officers in the narrative fields were consistent with the identified reason for the stop and/or search
4. Whether officers entered the correct format for the location of the stop

The following are the findings of that audit:

- Finding #1 – 100% compliance. No PII information was identified from the 94 SDCS samples examined.
- Finding #2 – 100% compliance. No unique identifying information was identified from the 94 SDCS samples examined.
- Finding #3 – 96% compliance. Of the 94 SDCS samples examined, SIU found that 96% or 93/96 were consistent. Consistency occurs when information in the open narrative field are consistent with identifiers chosen for the reason for stop and/or search.
- Finding #4 – 75% compliance. Of the 94 SDCS samples examined, SIU found that 75% or 75/94 followed the proper location format, however, 25% or 19/94 entries failed to apply the same location format  
(See Attachment # 16 Stop Data Collection System Inspection Report).

Remedial action was taken to resolve these issues through the issuance of a Department Notice on 10/07/2020. Attachment #17, Department Notice 20-141 addressed deficiencies uncovered by the aforementioned SDCS audit, and provided remedial training to correct those deficiencies.

### **3) Establish and implement plan to advance sound management practices.**

In February 2018 the department released Attachment #2: San Francisco Police Department Strategy 1.0. In the report Chief Scott identified six strategic areas of focus. One of those areas is "Measure Performance: Focus on Outcomes- collect, store and analyze data to better serve our community and increase accountability and transparency." Furthermore, the departments Strategy 1.0 sets a strategy of measuring, monitoring, and training to uphold our its commitment to policing without bias and addressing any issues in an open and collaborative manner.



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In January of 2019 the department created an IT Steering Committee, which was tasked with ensuring that the department's IT infrastructure supports enterprise, Citywide, and regulatory priorities. The IT Steering Committee is chaired by the Executive Director of the Strategic Management Bureau, who also oversees the Business Analysis Team (BAT). The SFPD Business Analyst Team (BAT) analyzes SDCS entries and completes a data cleaning process prior to summarizing said data in quarterly reports, such as [Attachment #12: Chapter 96A Q2 2020 Report](#). The alignment of IT Strategic Management processes and analysis of SDCS data under the same command structure ensures alignment of priorities and the ability to quickly react to evolving IT needs for the processing and disseminating of SDCS data.

Prior to the adoption of the Collaborative Reform Initiatives, the department used the E-585 entry mask in Cable to document race, gender, and search data on all traffic stops. Based on CRI recommendation 35.1, the department transitioned to the E-Stop system for entering stop related data, and finally to the SDCS system in 2018. With this most recent change, the department now captures not only traffic stop data but also bicycle and pedestrian stops. It has been through ongoing review of systems, their capabilities, and compliance with applicable laws and regulations that the department has evolved and improved its collection of stop related data.

The department continues to engage in a continuous improvement loop as to how it leverages a data driven approach to evaluating officer performance, leveraging not only stop data but also use of force and complaint data. This data driven approach would consolidate the data into a dashboard available to supervisors. The dashboard was identified as a need during the [Attachment #1: IT Systems Need and Gap Analysis](#). The department has been requesting funding for the dashboard as part the annual budget since the 2017/2018 fiscal year budget, see [Attachment #18: Technology Requests FY 19-20](#). In February of 202 the Personnel Management Dashboard was again reiterated as a significant priority for the 20/21 FY budget cycle, and estimated a three-year development and implementation cycle if funding can be obtained, [Attachment #19: Police Technology Modernization Updates](#). In spite of a lack of funding the department has identified the Personnel Management Dashboard as key management tool for identifying bias and giving supervisors and the department real time data to remediate it, and continues to make requesting funding a priority in each year's annual budget request.