



Recommendation 88.3

Tanya Koshy [Redacted]

Mon 1/11/2021 5:34 PM

[Redacted]

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Acting Captain Altorfer,

Our office has completed its review of the materials related to Recommendation 88.3 that have been submitted to us as part of the collaborative reform process. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

Recommendation 88.3:

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

Response to 88.3:

SFPD reviewed release data (that is, data of people who failed any portion of recruit training) in 2019 and determined that one of the primary reasons for release was failing the Emergency Vehicle Operations Course (EVOC). Since then, SFPD evaluated California Commission on Peace Officer Standards and Training (POST) standards, its existing training and testing modules, common reasons for failure, among other issues, and identified and implemented several changes to the EVOC in an effort to reduce the failure rate.

Among those changes were: 1) increasing the number of training hours to 80 hours (double the POST requirement of 40 hours); 2) assessing the amount of driving experience a recruit has prior to training to determine which recruits would need additional assistance; 3) providing 1-on-1 training to each recruit in any component of the course where they are identified as deficient; and 4) providing optional basic driving skills training. Since these changes were implemented in 2019, SFPD has seen a significant drop in the EVOC failure rate. Specifically, SFPD observed a 64.7% decrease in EVOC failures in the six Academy classes after the implementation of changes in comparison to the number of failures in the six Academy classes just prior to the implementation of changes. In other words, the average number of recruits who failed the EVOC went down from a little over five per class in the six classes prior to the 2019 implementation to two per class in the six classes post-implementation.

SFPD has developed two continuous improvement loops to ensure a low rate of releases on the basis of EVOC failure. First, the Training Division issued Unit Order 17-001, which mandates quarterly review meetings of release and attrition data. The Training Division formed a Review Committee, consisting of the Commanding Officer of the Training Division, the Basic Academy Director, the Basic Academy Coordinator, the Officer in Charge of the Training Division, and the Field Training Office Sergeant. The Review Committee Meeting meets quarterly, consistent with Unit Order 17-001, and they review various data sets on release and attrition of recruits. The data sets are prepared from a computer tracking system that tracks each recruit's progress through basic training and field training. SFPD uses this tracking tool to determine when a recruit is released (that is, fails a portion of the training program) or voluntarily resigns from training, and for what reason, and the race and gender of that recruit. The

[REDACTED]

Review Committee uses the data sets compiled from the tracking system to (1) identify any release or attrition trends and (2) conduct a barrier analysis, to determine if there are any systemic barriers that are driving those trends.

The Review Committee also reviews Exit Interview forms completed by the Basic Recruit Course Academy and Field Training Program Lieutenant. The Lieutenant completes the forms following an exit interview of any person released or resigned from the Academy. As part of the exit interview, the Lieutenant asks various questions designed to identify additional barriers contributing to release or attrition trends —such as whether there was anything that impacted the interviewee’s ability to successfully complete the Academy.

Unit Order 17-001 requires the Commanding Officer of the Training Division to prepare a report after each quarterly meeting for the Deputy Chief of the Administration Bureau, explaining, among other issues, any identified trends found in the Academy and Field Training, and any identified solutions to address those trends. SFPD provided examples of these reports in this package, which provided detail information consistent with the requirements of Unit order 17-001.

SFPD also recently issued Unit Order 21-03, which directs EVOC instructors to debrief following the completion of the 80-hour EVOC conducted for each Basic Academy class. During the debrief, the EVOC instructors evaluate all aspects of the training, including the testing, any failures, and any retesting. Following the debrief, a EVOC instructor at the debrief must complete an After Action Report on the information gathered during the meeting. The completed After Action Report is forwarded for review and approval to the Basic Course Coordinator and the Academy Director. Once approved, the Report is logged and filed for three years.

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

Please let us know if you have any questions or would like to discuss this further. Thank you.

Tanya

Tanya S. Koshy
Deputy Attorney General
Civil Rights Enforcement Section
California Department of Justice
1515 Clay Street, Suite 2100
Oakland, CA 94612

[REDACTED]
[REDACTED]

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

[REDACTED]

| | |
|---------------------|--|
| Finding # 88 | Gender, racial, and ethnic minority recruits were terminated at a higher rate from recruit training than White male recruits. |
|---------------------|--|

| | |
|------------------------------|--|
| Recommendation # 88.3 | The SFPD should evaluate whether orientation for recruits has positively impacted disproportionate termination rates related to Emergency Vehicle Operations Training failure. If not, the SFPD should identify other strategies to assist recruits. |
|------------------------------|--|

| | | | | | | | |
|------------------------------|--|-------------|--------------------|-------------|-------------|---------------|--|
| Recommendation Status | <table border="0"> <tr> <td style="background-color: yellow;">Complete</td> <td>Partially Complete</td> <td>In Progress</td> </tr> <tr> <td>Not Started</td> <td>No Assessment</td> <td></td> </tr> </table> | Complete | Partially Complete | In Progress | Not Started | No Assessment | |
| Complete | Partially Complete | In Progress | | | | | |
| Not Started | No Assessment | | | | | | |

Summary

The CRI Team is aware of ongoing review and focus on limiting the negative impact of EVOC on candidates. This file confirms the effort given that the early assessment identified that Emergency Vehicle Operations Course (EVOC) did negatively impact diverse candidates. Compliance Measure #1 is established under the existing data analysis (Recommendation 88.1) and as identified here. The department provides a draft unit order to continue the review. This is fully within the control of the SFPD and should be approved. The Training Division does demonstrate ongoing review and evaluation of the data and whether recruits continue to fail. Compliance Measure #2 continues to review the mitigation efforts and evaluates through measurement of recruit performance. The SFPD has provided evidence of ongoing review of impact of EVOC on candidates. It also uses exit surveys in an attempt to further identify issues. Compliance Measure #3 is part of the ongoing review, but the negative impact for candidates is such that does not require new mitigation at this time. However, as part of the initial mitigation, the SFPD substantially increased the focus and support to recruits have problems with the EVOC. For Compliance Measure #4, the strategies developed and implemented occurred primarily in 2018 and 2019 and continue to be used and evaluated. For compliance measure #5, the SFPD provides evidence of ongoing monitoring by SFPD. The actions described evidence a strong approach to ensure issue identification and correction, including after-action and review. This has resulted in a decreased fail rate overall and for EVOC in particular.

| Compliance Measures | | Status/Measure Met |
|---------------------|--|--|
| 1 | Evaluation of whether recruits continue to fail as a result of the EVO. | √ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| 2 | Evaluation of the mitigation in place for the EVO and whether it is working. | √ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| 3 | Identification of new strategies, as appropriate. | √ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| 4 | Implementation of new strategies, as appropriate. | √ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |
| 5 | Continuous review and improvement loop. | √ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |

Administrative Issues

This was a well-constructed file that was built to develop the evidence for the compliance measures and is one of the better structures presented.

Compliance Issues



Collaborative Reform Completion Memorandum

Finding # 88: Gender, racial, and ethnic minority recruits were terminated at a higher rate from recruit training than white male recruits. Gender, racial, and minority candidates accounted for 68.1 percent of all recruit terminations.

Recommendation # 88.3 The SFPD should evaluate whether orientation for recruits has positively impacted disproportionate termination rates related to Emergency Vehicle Operations Training failure. If not, the SFPD should identify other strategies to assist recruits.

Response Date: 10/17/2020

Executive Summary: The EVOC and RTO staff collaborated and evaluated the content and length of the EVOC orientation to see if it addressed the needs of the recruits as suggested in Recommendation 88.3, in an attempt to reduce the failure rates.

The Training Division and EVOC staff has identified and implemented the following strategies to assist recruits improve their driving skills and to reduce the termination/release rates:

- Increased the hours of training from 64 to 80 hours (POST only requires 40 hours)
- During orientation (Intro to EVOC, 4 hours), each recruit is given a survey to determine when they obtained their license, how many years they have been driving and their overall experience in operating a vehicle. The results of the survey help to determine which recruits will need more assistance.
- In addition, EVOC offers an optional training in basic driving skills. This is done twice for a total 16 hours (total of 100 hours of EVOC instruction).
- A Basic Vehicle Operation Knowledge Test.
- One on one training is given to each recruit who is deficient in an identified area (1 on 1 Remediation).
- More time in the vehicle driving (Practice Laps)
- Tutorial videos on proper driving skills
- A tracking log which tracks each recruit from the EVOC orientation through their 80 hour EVOC course. The tracking log is located in the recruits' binder which each recruit receives during their "Intro to EVOC".
- EVOC Safety Rules and Regulations.
- EVOC 2 week course outline
- Recruits will also have the following manuals available to them by hardcopy or over the internet
 - California Drivers Handbook
 - POST LD 19
 - POST DAI Manual
 - POST DTI Manual
 - SFPD Pursuit Policy



Collaborative Reform Completion Memorandum

Compliance Measures:

1. Evaluation of whether recruits continue to fail as a result of the EVOC.

As per Unit Order 17-001 (see attachment#1), the Training Division captures and analyzes identified data sets. The data sets are then reviewed by the Training Division quarterly Review Committee. This analysis and review is designed to identify trends in which recruits and trainees are released from the Basic Recruit Course Academy or from the FTO program. A review of the resignation and release factors by class data in the first quarter of 2019 by the Training Division quarterly Review Committee indicated that EVOC was a primary reason for recruit release (see attachment #2). Following the release of 9 recruits for EVOC in class 264, an initial meeting was held in Training Division on May 15, 2019. Several memos addressing the issue and recommendations of improvements were completed and forwarded up the chain of command. (See attachment #3)

The Training Division immediately examines the EVOC program upon class completion to ensure issues can be identified and addressed expeditiously. Unit Order 20-XX (pending approval from AC Moser and DC Yee) outlines procedures for mandatory EVOC staff de-briefs and After Action Reports (AAR) at the conclusion of each recruit class training. All completed AARs shall be completed within 5 business days and forwarded to the Academy Coordinator and Academy Director for approval. (See attachment #8). Due to the comprehensive improvement plan implemented in EVOC since class 265 (July 2019), the unit has not seen any significant issues with the EVOC training program and associated failures. Nonetheless, the data continues to be analyzed in an effort to identify areas of potential improvement.

2. Evaluation of the mitigation in place for the EVOC and whether it is working.

After implementing the strategies as stated in Executive summary for class 265, there was a noticeable decrease in the number of releases from EVOC Training. In class 264 there were 9 releases from EVOC and in class 265-270 the range of failures were from 0 to 4. Recruits were all given as many practice runs as they wanted before re-testing and they knew what to expect when they were being re-tested. Continuous analysis of classes since 265 show a continuous decline in EVOC as a factor for release or resignation (see attachment #4).

Training recommendations and testing changes were implemented for academy class 265 in July 2019. A significant improvement was seen in classes 265-270 as the failures went from 9 in class 264 to 3 in class 265, 0 in 266L, 2 in 267, 4 in 268, 2 in 269 and 1 in 270. A review of total EVOC failures in classes 259-264 (6 classes - pre recommendations) showed a total failure number of 34 Recruits, versus failures



Collaborative Reform Completion Memorandum

in classes 265-270 (6 classes – post recommendations) of a total failure number of 12. This comparison shows a 64.7% drop in total EVOC failures after implementation of EVOC recommendations in July 2019. (See attachments #4).

We continue to see improvement in this area as outlined in these attachments. This data shows the continuous improvement and the continuous analysis of detailed release and resignation factors.

The exit interviews are also reviewed to identify any areas of improvement. In the exit interviews conducted for EVOC releases for class 265, each recruit gave positive reviews of their Academy experiences (see attachment #7). In fact, 2 of the 3 recruits have since returned to the Academy. These exit interviews are reviewed at the quarterly review meetings (see attachment #5 - minutes of Training Division Quarterly Review Committee, 09/19 to present).

3. Identification of new strategies, as appropriate.

The following strategies have been identified with a goal of providing the recruits an environment to succeed:

- Increased the hours of training from 64 to 80 hours (POST only requires 40 hours)
- During orientation (Intro to EVOC, 4 hours), each recruit is given a survey to determine when they obtained their license, how many years they have been driving and their overall experience in operating a vehicle. The results of the survey help to determine which recruits will need more assistance.
- In addition, EOVC offers an optional training in basic driving skills. This is done twice for a total 16 hours (total of 100 hours of EVOC instruction).
- A Basic Vehicle Operation Knowledge Test.
- One on one training is given to each recruit who is deficient in an identified area (1 on 1 Remediation).
- More time in the vehicle driving (Practice Laps)
- Tutorial videos on proper driving skills
- A tracking log which tracks each recruit from the EVOC orientation through their 80 hour EVOC course. The tracking log is located in the recruits' binder which each recruit receives during their "Intro to EVOC".
- EVOC Safety Rules and Regulations.
- EVOC 2 week course outline
- Recruits will also have the following manuals available to them by hardcopy or over the internet
 - California Drivers Handbook
 - POST LD 19
 - POST DAI Manual
 - POST DTI Manual
 - SFPD Pursuit Policy



Collaborative Reform Completion Memorandum

4. Implementation of new strategies, as appropriate.

Class 264 had 9 EVOC failures. The Department quickly determined this number to be an above average failure rate. Meetings to discuss EVOC testing began May 15, 2019 and changes were implemented prior to class 265 beginning EVOC in July 2019. Testing changes occurred and were outlined in several Memorandums (see attachments).

5. Continuous review and improvement loop.

The Training Unit continues to monitor all EVOC Academy classes and continues to review the data to ensure that there is no increase in failures due to EVOC. Since the implementation of a comprehensive improvement plan in 07/2019, no new strategies have been developed as the failure rate due to EVOC has decreased. The unit continues to monitor the program looking for ways to improve.

In addition to the quarterly meetings by The Training Division Quarterly Review Committee, the Training unit reviews the EVOC data immediately after each program is complete to address any issues. Part of the data collection includes exit interviews, formal de-briefs and AARs. Through analysis, the unit has not identified any EVOC training concerns where high failure rates (as seen in past Academy classes) has reoccurred.

Additional Attachments:

Attachments #6

- 1) Learning Domain #19
- 2) San Francisco Police Academy Emergency vehicle operations course links
- 3) San Francisco Police Academy Emergency vehicle operations course knowledge test
- 4) San Francisco Police Academy Emergency vehicle operations course