

From: [Tanya Koshy](#)
To: [REDACTED]
Subject: Recommendation 89.1
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Dear Acting Captain Altorfer:

Our office has completed its review of the materials related to Recommendation 89.1 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 89.1: As part of the Strategic Plan (recommendation 39.1), the SFPD should develop a comprehensive diversity strategic plan that articulates the department's vision and commitment to organization wide diversity initiatives including recruiting, hiring, and retaining a diverse and high-performing workforce. For this recommendation, the diversity strategic plan should:

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

Response to 89.1:

SFPD established a working group that developed a strategic plan which addressed each of the goals listed in Recommendation 89.1. The strategic plan was finalized in October 2020. The strategic plan's goals, objectives, and metrics to recruit, hire, and retain a diverse workforce are informed by the working group's survey of SFPD's existing practices and procedures, peer agencies' best practices, and existing data collection practices.

The strategic plan has assigned responsibility for each goal and priority. For example, the strategic plan identified that SFPD has a goal of ensuring that all applicants "experience an equitable and timely [background check investigation] process, and are treated in a fair, unbiased, and professional manner." (Diversity Strategic Plan at p. 22). From there, the plan describes that an objective under that goal is to develop a standardized process for tracking, monitoring, and reviewing the demographics of applicants as they go through the hiring process. The strategic plan then identifies the Background Investigations Unit as responsible for implementation of this goal and objective.

SFPD has also established performance metrics to track progress on each of the strategic plan's identified goals. The California Department of Justice agrees with Hillard Heintze that the strategic plan is relatively new and SFPD may find that it needs to identify additional performance metrics to ensure a diverse workforce. However, the existing metrics suffice for purposes of substantial compliance.

Finally, SFPD has identified processes to ensure continuous review and improvement for each identified goal. For example, to support its goal of diversity in hiring, the strategic plan describes the Background Investigation Unit's master spreadsheet which tracks information related to each job applicant, including whether they were disqualified for any reason during the background check process. This spreadsheet is linked to a dashboard and the data is reviewed at quarterly recruitment and hiring meetings. As another example, the strategic plan notes that the Recruitment Unit publishes a Year End Review. The Year End Review is codified in Unit Order 20-02 ("Recruitment

Unit - Year End Review Report," issued August 1, 2020) and includes an assessment of recruitment events and activities, applicant contacts, media advertising, and recruitment strategies.

Based on 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.

Tanya

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Hillard Heintze File Review Recommendation # 89.1

Finding # 89 The SFPD lacks a strategic plan for diversity including recruitment, retention, and advancement.

Recommendation # 89.1 As part of the Strategic Plan (recommendation 39.1), the SFPD should develop a comprehensive diversity strategic plan that articulates the department's vision and commitment to organization-wide diversity initiatives including recruiting, hiring, and retaining a diverse and high-performing workforce. For this recommendation, the diversity strategic plan should

- identify specific diversity recruiting priorities that are informed by empirical data that identify areas of underrepresentation;
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Recommendation Status Complete Partially Complete In Progress
Not Started No Assessment

Summary

The predicate action here is the development of the Diversity Strategic Plan which the department completed in October 2020, and it is well rounded and guided by planning and deliverables. The Diversity Plan includes recruiting, hiring and retention goals for the SFPD.

SFPD continues to be one of the more diverse major city police departments; however, the department has identified concerns around establishing either limitations or parameters for unit diversity. Therefore, the goals for inclusion and diversity are not number driven in units across the department. As the department develops the Strategic Diversity Plan and the measures for its overall plan, consistent and measured review of success in expanding diversity and inclusion should be measured as a whole. The SFPD has demonstrated commitment and ongoing focus in addressing diversity. The plan establishes goals that are relatively new. However, based upon the work to date and discussions around implementation of the plan, the department is compliant. Additionally, under the strategic plan, each task and goal is specifically assigned and tasked.

Under compliance measure five, the SFPD submits the diversity plan metrics on P41-43 of the strategic plan as evidence of completion of this compliance measure. The information provided is a start - the SFPD needs to develop clear data for analysis, discussion and planning. The file submitted reflects this work and the data collected - and current metrics - supports future growth. However, specific metrics remain to be developed. In part, due to the relative newness of the strategic plan and in part due to the work done in developing the data and framework to support the plan.

The SFPD identifies that the continued improvement goal is incorporated within the current strategic plan. In part, this is correct. However, the SFPD needs to assess and update the future goals for each area of metric and establish its strategies for the ongoing development of staff to reflect its specific inclusion and diversity goals. For example, the data between 2018 and 2019 have wide variances, but for 2019-2021 there is more consistency, which is evidence of improved focus on data integrity. Ensuring better data and a specific strategic goals for the continued growth of inclusion and diversity through all of the ranks of the department should be the ongoing improvement focus. However, for the work to date, the department has accomplished a significant amount of work and the appropriate framework has been established through the strategic diversity plan.

Hillard Heintze File Review Recommendation # 89.1

Compliance Measures		Status/Measure Met
1	Develop and identify a strategic diversity plan for the department.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2	Include recruiting, hiring and retention goals and priorities for the department.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3	Identify diversity goals for current employees and units within the department.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4	Affix specific responsibility for each of the diversity tasks and goals.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5	Establish performance measurements linked to the strategic diversity plan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6	Continuous review and improvement loop.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Administrative Issues

Compliance Issues



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Finding # 89: The SFPD lacks a strategic plan for diversity including recruitment, retention, and advancement.

Recommendation # 89.1: As part of the Strategic Plan (recommendation 39.1), the SFPD should develop a comprehensive diversity strategic plan that articulates the department's vision and commitment to organization-wide diversity initiatives including recruiting, hiring, and retaining a diverse and high-performing workforce. For this recommendation, the diversity strategic plan should:

- Identify specific diversity recruiting priorities that are informed by empirical data that identify areas of underrepresentation;
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Response Date: 03/01/2021

Executive Summary:

The Diversity Strategic Plan was developed in response to the 2016 United States Department of Justice (DOJ) Collaborative Reform Initiative (CRI) which provided an assessment of San Francisco Police Department (SFPD) policies and practices. The review found that while "the SFPD is to be commended for its diversity in overall staffing," the organization "lacks a strategic plan for diversity including recruitment, retention, and advancement" (Finding, Recommendation 89.1).

In response to this Finding, the SFPD Staff Services Division convened a Diversity Strategic Plan Working Group that developed the goals, objectives and metrics to implement, track and institutionalize initiatives that aim to recruit, hire and retain a diverse and high-performing workforce. The Working Group surveyed current practices and procedures in recruiting, hiring, training and retention; identified current and future initiatives to promote diversity in these areas, based on best practice and peer jurisdiction research; and assessed current data collection methodologies to determine data currently available and data needed in order to track and measure performance toward diversity goals on a standardized and recurring basis.

The Plan divides the department's vision and commitment to organization-wide diversity into five Strategic Goals, each with both department-wide and unit-level objectives for identifying and implementing diversity initiatives, and plans for collecting, monitoring and analyzing empirical data to monitor performance. Each Strategic Goal section assigns responsibility for



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implementing initiatives, and tracking and reporting data. Priorities listed in these Strategic Goal sections are both near- and long-term.

The Strategic Goal areas are:

- Strategic Goal 1: Diversity in Recruitment
- Strategic Goal 2: Diversity in Hiring
- Strategic Goal 3: Diversity in Academy and Field Training
- Strategic Goal 4: Retention, Support and Professional Development
- Strategic Goal 5: Organizational Accountability

Compliance Measures:

1) Develop and identify a strategic diversity plan for the department.

The comprehensive Diversity Strategic Plan submitted represents SFPD's effort to develop and identify a strategic diversity plan for the department.

2) Include recruiting, hiring and retention goals and priorities for the department.

The Diversity Strategic Plan includes a section on Strategic Goal 1: Diversity in Recruiting (pages 15-20), Strategic Goal 2: Diversity in Hiring (pages 22-25) and Strategic Goal 4: Retention, Support and Professional Development (pages 36-39). The associated goals and priorities are laid out in each section.

3) Identify diversity goals for current employees and units within the department.

On Monday, October 26, 2020, SFPD Professional Standards members participated in a conference call with members of Hillard Heintze and the California Department of Justice. During the technical guidance call, suggestions and guidelines were discussed for this recommendation as described below.

"SFPD presented its Diversity Strategic Plan, how it was created, and its goals. Hillard Heintze requested that SFPD elaborate on Compliance Measure 3 about how it will consider metrics for each unit. SFPD and Cal DOJ also suggested possible improvements, including showing demographic information by rank and identifying whether positions are based on seniority or are open for applications."

Chief Scott indicated in a Working Group meeting that he did not want to set specific, numeric diversity goals for any employees or units in the recruitment and hiring space, or any units in department. Under that direction, we have not included specific (numeric) diversity goals for any units. However, SFPD closely tracks and monitors the demographics of every unit in the department using a comprehensive dashboard that is updated bi-weekly and distributed to Command Staff. This dashboard is shown and



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discussed on page 43 of the plan. Moreover, SFPD now publicly publishes demographic statistics by rank, including comparisons of supervisory ranks to the whole sworn workforce. This information is written up, and the link provided, on page 43 of the plan.

4) Affix specific responsibility for each of the diversity tasks and goals.

This compliance measure has been met. Each Strategic Goal section includes the goals, objectives, and plans for continuous improvement, and affixes responsibility for diversity-related tasks. The sample section is on page 14. Moreover, the Organizational Accountability section (pages 41-43) specifically designate responsibility for all diversity tasks and goals.

5) Establish performance measurements linked to the strategic diversity plan.

This compliance measure has been met. Each Strategic Goal section has a "Key Indicators" section that details the quantitative metrics tracked and monitored for each respective section. It should be noted that per policy, SFPD does not, for example, set specific diversity hiring targets; however, this information is continuously analyzed and monitored.

6) Ongoing and continuous review and improvement loop.

This compliance measure has been met. Each Strategic Goal section includes a plan for continuous improvement. Moreover, the Organizational Accountability section (pages 41-43) specifically outlines the ongoing plan for data updating, analysis and review in order to drive decision-making.

On Thursday, February 25, 2021, SFPD Professional Standards members received an email correspondence for Hillard Heintze requesting additional clarifying information for the recommendation package.

I suggest review of the below as a matter of appropriate view and file submission.

Are ALL assignments to unit by seniority and survey protocols? I would argue that when it comes to unit assignment, there are management selections. Further, newly promoted personnel are assigned as needed. These are two specific areas in which leadership vision can help expand diversity based upon assignment of qualified, diverse personnel.

In response, SFPD recently issued Department Notice 21-033 addressing assignments of newly promoted personnel (attachment #2). As mentioned in the notice,



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These assignments are a result of a collaborative process in which all Deputy Chiefs ("DCs") and the Executive Director of the Strategic Management Bureau ("ED") met to discuss and prepare a proposal to the Assistant Chiefs and Chief recommending new promotees' assignments and any subsequent assignment changes necessary. The Deputy Chiefs and Executive Director (DCs/ED) used the following general guidelines for making their recommendations:

- Ensuring a balance of experience - in order to ensure future growth of our personnel, the DCs/ED sought to ensure that assignments give Members new opportunities, experiences, and skills in new assignments or in a particular bureau. The DCs/ED also seek to reintroduce members to the Operations Bureau when away from that assignment for a long period of time.
- Familiarity with the assignment - even where an assignment to a Bureau was new or renewed, the DCs/ED factor in past work experience. For example, a Member assigned to an investigative role outside of the Investigations Bureau might get assigned to the Investigations Bureau or a Member assigned previously as an Officer or Sergeant to a particular District might get assigned as a Lieutenant or Captain to that District.
- Readiness for the assignment - the DCs/ED evaluate Members' special attributes, such as organization skills, training, and education applicable to the new assignment. While assignments are made considering the needs of the Department, ultimately Members' personal and professional growth are prioritized. The recommendations by the DCs/ED are presented to the Assistant Chiefs and Chief of Police for consideration. Ultimately, the assignments are approved by the Chief of Police.

[REDACTED]