

Compliance Measures for Accountability Recommendations

Table Key

Highlighted rows are the recommendations identified as Priority One in Phase 1, and the compliance measures have been approved.

Highlighted rows are the recommendations identified for use in Phase 2, and the compliance measures have been approved.

Recommendation contains a reference to a best practice.

Chapter 5 - Accountability					
Finding #	55	The SFPD is not transparent around officer discipline practices. During the community listening sessions and interviews with community members, there was a consistently stated belief, especially in the African-American and Hispanic communities, that officers are not held accountable for misconduct.	Compliance Measures		Status
Rec #	55.1	The SFPD should expand its current reporting process on complaints, discipline, and officer-involved shootings to identify ways to create better transparency for the community regarding officer misconduct.	1	Develop a plan for expanded reporting process for actions regarding officer misconduct, discipline, and OIS.	
			2	Identify ways to increase transparency in reporting complaints and providing the public with information about officer-involved shootings and disciplinary actions.	
			3	Expand communication about complaint and discipline reviews to include the community.	
			4	Expand OIS reporting to the community.	
			5	Frame public reporting in a manner that reflects the future provisions of SB 1421.	

			6	Update all relevant DGOs, trainings, and procedures as guided by best practices, as necessary.	
			7	Establish an audit and review loop to assure goals are being met by including community feedback.	
Rec #	55.2	Consistent with the current practice on Early Intervention System data, the SFPD should develop and report aggregate data regarding complaints against Department members, their outcome, and trends in complaints and misconduct for both internal and external publication.	1	Develop report standards.	
			2	Populate report with aggregate data, including trends and outcomes with respect to complaints and misconduct.	
			3	Publish report for internal and external publication.	
Finding #	56	The SFPD does not engage in community outreach and information regarding the discipline process and rights of the community.	Compliance Measures		Status
Rec #	56.1	The SFPD should work with the DPA and Police Commission to minimize obstacles to transparency as allowed by law to improve communications to complainants and the public regarding investigation status, timeliness, disposition, and outcome.	1	Establish a routine meeting cadence with DPA and Police Commission.	
			2	Identify strategies for improved communication to complainants and the public regarding the progress and conclusion of investigations, including outcomes.	
			3	Publish information in accordance with developed strategy.	
Rec #	56.2	The SFPD should allocate appropriate staff and resources to enhance community outreach initiatives and to incorporate customer service protocols for periodic follow-up and status communications with complainants for the duration of their open cases.	1	Assessment of staffing needs to support community outreach, customer service protocols, and communications with complainants.	
			2	Establish a customer service protocol for complaints that includes status updates to complainants.	
			3	Evidence that communications with complainants are occurring.	
			4	Evidence of ongoing review improvement loop.	
Rec #	56.3	The SFPD should work with the DPA to facilitate the same actions and outreach to the community as best suits the independence of the DPA.	1	Evidence of the support for the actions in Rec 56.1 and ongoing meetings to discuss	

				the best way in which to facilitate communications regarding officer discipline matters.	
			2	Encourage DPA to establish a protocol for outreach to communities to provide transparency around officer discipline.	
Rec #	56.4	The SFPD should ensure that the DPA public complaint informational materials are readily available in the community and in particular prominently displayed in district stations for access by the public. These materials should be designed to educate the public about confidentiality limitations on sharing investigative information to inform residents of the type of feedback they may reasonably expect, and they should be provided in multiple languages.	1	Collaborate with DPA to provide input in developing materials that inform the diverse communities of San Francisco.	
			2	Establish policy/protocol for DPA information and materials to be displayed in district stations and other area accessible to the public including but not limited to the SFPD website.	
			3	Make certain that materials are available to the public.	
Rec #	56.5	The SFPD should work with the DPA and the Police Commission to conduct community workshops on the complaint process and the roles and responsibilities of each agency relative to the overall process within nine months of the issuance of this report.	1	Concurrent with actions recommended in 56.1, draft a plan for workshop presentations.	
			2	Deliver workshop presentation.	
			3	Refresh outreach as needed.	
Rec #	56.6	The SFPD should encourage the DPA and IAD to identify obstacles that interfere with optimal complaints investigations and accountability, with a goal of implementing changes to better support their intended missions.	1	Concurrent with actions recommended in 56.1, discuss challenges faced in investigations against police officers.	
			2	Identify obstacles.	
			3	Develop a plan and process to minimize and/or overcome the identified obstacles.	
			4	Periodic review and assessment of the plan to determine its effectiveness in overcoming the identified obstacles.	
Finding #	57	The SFPD does not provide leadership in its role with respect to complaints against SFPD personnel.	Compliance Measures		Status
Rec #	57.1	The SFPD needs to update its policies and educate personnel to	1	Update policies regarding the critical nature	

		appropriately recognize the importance of the first interaction between police personnel and members of the public who have complaints against the police.		of positive interactions with the public, specifically those who are complaining against a police officer.	
			2	Provide training reinforcement regarding the need for positive first contacts with the public and complainants.	
			3	Evidence of continuing review and improvement on this topic.	
Rec #	57.2	The SFPD should institutionalize the process of explaining and assisting community members who file complaints against officers.	1	Develop materials about how to register complaints against officers.	
			2	Provide tools and information about filing complaints across all districts.	
Rec #	57.3	The SFPD should ensure that all personnel are trained and educated on the public complaint process and the location for the appropriate forms.	1	Provide recruit training on complaint processes including how to inform the community about filing complaints.	
			2	Provide roll call training on complaint processes and location of complaint forms.	
			3	Ensure supervisors are trained and knowledgeable about complaint processes and location of complaint forms.	
			4	Evidence that the training has been completed.	
Rec #	57.4	The SFPD should develop “next steps” and “know your rights” handouts for complainants who file complaints at department facilities.	1	Concurrent with Rec. 56.1, 56.4, 56.5 & 57.2, develop standard information forms that address the realm of the complaint process, from initiation to closure.	
			2	Ensure forms remain available to the public, both paper and electronically in multiple languages per SF policy.	
Finding #	58	The SFPD does not have a tracking system for complaints received at a district station.	Compliance Measures		Status

Rec #	58.1	The SFPD should establish a record system for ensuring that complaints received at a district station are forwarded properly and in a timely matter to the DPA. E-mail and fax should be considered for ensuring delivery and creating a record.	1	Concurrent with Rec. 56.1, establish a trackable system for the registration of complaints at the district level.	
			2	Audit process that tracks the proper and timely delivery of complaints to DPA.	
Finding #	59	SFPD Internal Affairs Administrative Investigations and Internal Affairs Criminal Investigations are not effectively collaborating.	Compliance Measures		Status
Rec #	59.1	Members, including investigators, of the IA Administrative Unit and IA Criminal Investigations Unit should meet regularly to discuss processes, practices, and the flow of assigned cases to ensure that administrative violations are timely and properly addressed.	1	Establish a routine meeting schedule in IA for all units.	
			2	Keep agenda and track tasks assigned and their resolution specific to this recommendation.	
			3	Review and monitor case completion for timely resolution of all investigations.	
			4	Evaluate any cases that are not resolved in a timely manner or properly addressed for purposes of improving process.	
Finding #	60	Internal Affairs case tracking is insufficient to ensure the timely progression of investigations and achieving key deadlines.	Compliance Measures		Status
Rec #	60.1	The SFPD and DPA should jointly develop a case tracking system with sufficient security protections to assure independence that would identify each open investigation, where it is assigned, and the date the case expires for the purposes of compliance with California Government Code Section 3304(d)1, which requires the completion of an administrative investigation into misconduct within one year of the agency discovery.	1	Concurrent with Rec. 56.1, explore the options for a shared case tracking system.	
			2	Ensure internal SFPD controls over accurate case tracking consistent with California law.	
			3	Establish a plan and protocol for shared tracking of complaints against officers as they move through the internal discipline system.	
Rec #	60.2	The SFPD and DPA should establish an investigative protocol within 120 days of the issuance of this report that allocates specific time parameters for accomplishing investigative responsibilities and transfer of cases if criminal allegations are made against SFPD officers.	1	Established investigative protocol between SFPD and DPA.	
			2	Protocol addresses time parameters and transfer requirements for criminal cases.	

			3	Update relevant DGOs and procedures, as needed.	
			4	Evidence of ongoing audit and/or review.	
Rec #	60.3	Supervisors should be held accountable for ensuring timely transfer of cases to SFPD Internal Affairs Administrative Investigations from SFPD Internal Affairs Criminal investigations when appropriate.	1	Establish a protocol and policy regarding the transfer of cases including time constraints that allow investigation within the parameters of the requirement of California Government Code Section 3304(d)1.	
			2	Ensure training on policy in a manner that will quickly and thoroughly inform members	
			3	Task supervisors with responsibility for ensuring timely transfer of cases.	
			4	Conduct internal review and reporting around compliance with policy.	
			5	Evidence of supportive and remedial action if deficiencies are found.	
Finding #	61	The SFPD's Internal Affairs Division does not have standard operating procedures or templates for investigation reporting.	Compliance Measures		Status
Rec #	61.1	The SFPD should develop a Standard Operating Procedures Manual detailing the scope of responsibility for all functions within the IAD. Standard operating procedures should provide guidance and advice on conflict reduction, whether internal or external to the SFPD.	1	Task development of an IA SOP.	
			2	Ensure appropriate procedures for conflict resolution – e.g., when cases are assigned to DPA, IA admin or IA crim.	
			3	Train all staff on the policy.	
			4	Audit and/or review loop as to unit compliance.	
Rec #	61.2	The SFPD must establish clear responsibilities and timelines for the progression of administrative investigations, and supervisors should be held to account for ensuring compliance.	1	Concurrent with Rec 61.1, establish responsibilities and timelines for investigations and supervisors.	
			2	Audit and/or review loop as to unit compliance.	

			3	Evidence of supportive and remedial action if deficiencies are found.	
Finding #	62	Files stored with the SFPD's Internal Affairs Division are secured, but compelled statements are not isolated.	Compliance Measures		Status
Rec #	62.1	The SFPD needs to establish standard operating procedures for maintaining file separation and containment of criminal investigations. This is critical to ensuring that officers' rights are protected and that criminal investigations can be fully investigated.	1	Concurrent with Rec 61.1, establish a protocol and SOP to ensure file separation for criminal and administrative investigations.	
			2	Task supervisor with review and oversight of this aspect of investigation.	
			3	Review loop and evidence of supportive and remedial action if deficiencies are found.	
Finding #	63	The SFPD does not fully support members performing internal affairs functions.	Compliance Measures		Status
Rec #	63.1	The SFPD should clearly define the authority of IAD and reinforce that cooperation and collaboration with IAD is mandatory.	1	Policy and protocols emphasize the role of IAD and its importance to the organization.	
			2	Establish policy and protocols that require cooperation by members of the department.	
			3	Review/improvement loop to ensure IAD investigators are receiving cooperation.	
Rec #	63.2	The SFPD should continue to implement the tenets of procedural justice and ensure training include instruction on the importance of the IAD's functions to the integrity of the department and connection to the community.	1	Develop clear messaging on the role of IAD and its ties to the tenants of procedural justice in training.	
			2	Provide training regarding internal investigations and the role of organizational accountability.	

Rec #	63.3	SFPD leadership should demonstrate its support of the IAD's role and responsibility within the department and provide recognition and support for good investigative practices.	1	Establish consistent leadership messaging as part of Rec 63.2 to help develop a culture of accountability.	
			2	Establish formal recognition practices for the work of the IAD and good investigations.	
Finding #	64	The SFPD does not routinely collaborate with the Office of Citizen Complaints.	Compliance Measures		Status
Rec #	64.1	The SFPD should convene a joint review process within 90 days of the issuance of this report, co-chaired by DPA and SFPD senior staff, to evaluate existing complaint and disciplinary processes, policies, and liaison relationships to enhance trust and legitimacy around these issues.	1	Establish a plan and protocol for ongoing, task-driven collaboration between the SFPD and the DPA.	
			2	Establish a joint review process to examine inefficiencies, policy gaps and protocols for the complaint system	
			3	Continuous improvement loop documenting progress and tasking of the joint review process.	
Rec #	64.2	The SFPD should immediately accept DPA's recommendation, as reported in the First Quarter 2016 Sparks' Report, to convene quarterly meetings between DPA staff and SFPD staff.	1	Immediately establish quarterly meetings with DPA to address the Sparks' Report.	
			2	Audit loop or management review regarding the convening of the quarterly meetings.	
Rec #	64.3	The SFPD should seek to improve interagency communications and identify ways of improving collaboration on investigative practices to ensure timely conclusion of investigations, shared information on prior complaints and finding of misconduct, and appropriate entry of discipline, designed to improve the overall discipline system that holds officers to account.	1	Concurrent with Rec 64.2, as part of the joint review process, establish shared protocols for investigations.	
			2	Concurrent with Rec 64.2, explore ways to better collaborate on investigative practices and administration of investigations.	
			3	Evidence of evaluation process and improvement loop	
Rec #	64.4	The SFPD should work with DPA to develop standards within 120 days of the issuance of this report regarding timeliness of complaint investigations, and consistency of investigative findings and practices to ensure progressive discipline is appropriately recommended.	1	Identify gaps and challenges to a) timely investigations and b) practices to ensure progressive discipline is appropriately recommended.	

			2	Establish timelines for investigative stages and provide shared information regarding the meeting of those timelines.	
			3	Continuous improvement loop regarding timely investigations, progressive discipline, and shared information as appropriate.	
Rec #	64.5	The SFPD should engage with DPA to ensure that the classification for complaints and their findings are reported consistently between the two agencies to ensure better transparency.	1	Collaborate with DPA on a shared, standard joint protocol for the classification of complaints.	
			2	Train SFPD personnel on classification.	
			3	Offer a shared training session with DPA to better facilitate proper classification.	
			4	Ensure that SFPD follows the classification through audit and/or review process.	
			5	Audit and/or review to inform the Police Commission and DPA when DPA does not adhere to the classification standards.	
Finding #	65	The SFPD does not sufficiently analyze Office of Citizen Complaints reports and analyses of its complaints, investigations, and case dispositions.	Compliance Measures		Status
Rec #	65.1	The SFPD should develop a department-internal priority to regularly review and analyze DPA complaint reporting to identify priorities for intervention in terms of workforce culture, training, policy clarification, or leadership development.	1	Establish a data collection and review plan for DPA complaints.	
			2	Task personnel with review and analysis.	
			3	Share internally the trends and issues identified.	
			4	Continuous improvement loop as to the issues identified.	
			5	Evidence of identification of and response to issues and trends.	
Rec #	65.2	The SFPD should raise district captains' awareness of this information by requiring IAD to present a trends analysis report of DPA case activity, emerging issues, and concerns at CompStat meetings every quarter.	1	Concurrent with Rec 65.1, share the analysis and trend information with District Captains.	

			2	Task captains with addressing the trends and issues.	
			3	Evaluate success of the measures to address complaint trends at CompStat meetings every quarter.	
			4	Evidence of tasking and response at the district level to the trends and issues.	
			5	Continuous improvement loop.	
Finding #	66	The SFPD is not required to take action on the recommendations put forth in the Office of Citizen Complaints Sparks Report.	Compliance Measures		Status
Rec #	66.1	The SFPD should meet with DPA on a quarterly basis following the release of the Sparks Report to discuss the recommendations.	1	Establish quarterly meetings with DPA.	
			2	Provide record of discussion of the Sparks Report recommendations.	
			3	Audit loop regarding progress of the quarterly meetings.	
Rec #	66.2	The SFPD should make it mandatory for the Professional Standards and Principled Policing Bureau to review the Sparks Report and direct action where appropriate.	1	Establish PSPPB policy and procedure requiring review of Sparks Report.	
			2	Identify follow through requirements for SFPD, where appropriate.	
			3	Evidence of PSPPB direction to address Sparks Report actions.	
			4	Audit and/or review loop as to unit actions in response.	
Rec #	66.3	The SFPD should provide twice-yearly reports to the Police Commission regarding actions resulting from the Sparks Report, including whether the DPA recommendation is supported and a timeline for implementation or correction to existing practice and policy.	1	Establish policy and procedure for reporting of Sparks Report actions by SFPD.	

			2	Evidence of actions regarding Sparks Report recommendations to include timeline for implementation or action that occurred, where appropriate.	
			3	Evidence of reporting to the Police Commission regarding Sparks Report actions by the SFPD.	
			4	Audit and review loop as to the process and progress.	
Finding #	67	The SFPD does not analyze trends in complaints, situations that give rise to complaints, or variations between units or peer groups in relation to complaints and misconduct.	Compliance Measures		Status
Rec #	67.1	The SFPD must work to develop practices that measure, analyze, and assess trends in public complaints and employee misconduct.	1	Concurrent with the actions under Finding 65, the SFPD should establish a data collection and analysis plan for complaints. The analysis should meet the same analytical threshold as other department analyses.	
			2	Trend analysis information should be measured and shared at quarterly CompStat meetings.	
			3	Evidence of data analysis and sharing.	
Rec #	67.2	Supervisors should be provided with quarterly reports that integrate individual actions, as is currently reported by the Early Intervention Systems Unit, with aggregated information that provides complaint and misconduct data trends for the watch, district, and city.	1	Provide reports to supervisors with both EIS and active complaint and misconduct information for subordinates.	
			2	Provide information to supervisors on a quarterly basis.	
			3	Discuss trends and actions at quarterly CompStat meetings, concurrent with Rec 67.1.	

Finding #	68	<p>The SFPD has poor data collection and analysis, which significantly impacts effective overall organization management and accountability.</p> <p>The technology in the SFPD requires significant updating. However, poor data collection practices, including lack of supervisory review and accountability for improperly completed reports and form sets, contributes to the poor data environment.</p>	Compliance Measures		
Rec #	68.1	As part of its technological capacity improvement strategy, the SFPD should develop a plan to advance its capacity to digest information it currently possesses in a consistent, easily accessible format such as a template containing key data points including officer performance indicators and crime indicators that could provide management with real-time information to inform their practice.	1	Engage supervisors to understand the data needs for operations.	
			2	Develop report templates with key data collection factors.	
			3	Train supervisors to the issues around data collection and importance of the good data to organizational performance.	
			4	Develop information sharing plan for supervisors so that the connection to data and operations is reinforced.	
			5	Continuous improvement loop.	
Rec #	68.2	Supervisors and officers who fail to properly collect and enter information must be held accountable through discipline. Absent proper collection of data, little to no analysis can occur.	1	Establish policy and procedure regarding proper collection and entry of data – including non-compliance.	
			2	Establish and deliver training or training tools to support proper data collection and entry.	
			3	Establish a policy and procedure regarding supervisory review of data collected and reported.	
			4	Review/audit process established to review information collected at the officer and supervisor levels.	
			5	Evidence of supportive and remedial action if deficiencies are found.	
			6	Ongoing audit and/or review loop to address trends and other issues.	

Rec #	68.3	The SFPD should increase transparency by collecting and providing data, policies, and procedures to the public in multiple languages relevant to the local community through official SFPD website and municipal open data portals.	1	Establish a formal policy to transparency in data.	
			2	Support the policy through procedures and protocols.	
			3	Develop a communication strategy that allows the public informed easy access, including website and municipal open data portals.	
			4	Ensure the communication strategy incorporates a variety of languages in use in San Francisco.	
Finding #	69	The SFPD does not consistently apply the principles of procedural justice.	Compliance Measures		Status
Rec #	69.1	SFPD leadership should examine opportunities to incorporate procedural justice into the internal discipline process, placing additional importance on values adherence rather than adherence to rules. The Police Commission, DPA, IAD, and POA leadership should be partners in this process.	1	Convene an internal discipline stakeholder group to address the specific administrative practices that attach to internal investigations.	
			2	Examination of how to incorporate procedural justice – being fair in processes, being transparent in actions, providing voice, and impartial decision making – across the internal investigation and discipline process.	
			3	Strategy to incorporate procedural justice into the internal investigation process.	
			4	Continuous improvement loop.	
Rec #	69.2	The SFPD should task a committee to review internal discipline on a quarterly basis to assure the fairness and impartiality of the process overall and particularly to ensure that there is not bias in determination and application of discipline. This analysis should be multi-levelled to include aggregate data, trend analysis, and outcome impact on officer demographics including prior discipline and adherence to the discipline matrix.	1	Establish a committee to identify key data variables to examine in support of fair and impartial discipline.	
			2	Provide quarterly analysis of the data variables to identify trends, including potential bias, in discipline outcomes.	
			3	Identify potential negative trends including bias and apply corrective action.	
			4	Review and evidence of corrective action.	

Rec #	69.3	The SFPD should report annually to the Police Commission the analysis of discipline including officer demographics and prior discipline histories.	1	Develop an annual report from the data developed in Rec 69.2.	
			2	Share this data with the Police Commission.	
Finding #	70	The process to update Department General Orders is overly protracted and does not allow the SFPD to respond in a timely manner to emerging policing issues.	Compliance Measures		Status
Rec #	70.1	The SFPD should work with the Police Commission to develop a nimble process for reviewing and approving existing and new Department General Orders that supports policing operations with codified, transparent policies.	1	Establish a plan that allows for triage regarding DGO modification - critical need; operational need; and update.	
			2	Establish a plan that allows modifications to existing DGOs that does not require review of the entire order based upon critical and operational need.	
			3	Develop a task flow that establishes timelines for submission, review and approval of DGOs that is more nimble than previous processes.	
			4	Continuous review and improvement loop.	
Rec #	70.2	The SFPD should commit to updating all Department General Orders in alignment with current laws and statutes, community expectations, and national best practices every three years.	1	Develop a plan and process to update the DGOs based upon priorities every three years.	
			2	Task specific units and individuals with assisting in the identification of and review of key issues, national best practices, and community expectations attached to DGOs to ensure an appropriate update of every three years.	
			3	Monitor and track progress regarding DGO updates.	
			4	Continuous improvement loop that is informed by contemporary policing best practices.	

Rec #	70.3	Prior to promulgation of policies and procedures, the SFPD should ensure that comments are sought from members and units most affected by any practice, policy, or procedure during the initial stages of development.	1	Identify unit level experts for opinion and input in the development of DGOs.	
			2	Develop a tracking system to log and reconcile expert input.	
Rec #	70.4	Input and review from external stakeholders must be completed before implementation of the practice, policy, or procedure.	1	Establish a policy and practice on external input solicitation.	
			2	Use a tracking system similar to that identified in Rec 70.3 to track and reconcile external comments.	
			3	Establish review loop to ensure the concepts of procedural justice apply.	
Finding #	71	The SFPD does not have an effective process for the development and distribution of Department General Orders and Bulletins.	Compliance Measures		Status
Rec #	71.1	The SFPD needs to work with the Police Commission to create a process to make timely and necessary updates to key policies.	1	Develop a strategy and plan to more rapidly update policies, consistent with the recommendations in Finding 70.	
			2	Evidence of a plan.	
			3	Continuous improvement loop.	
Rec #	71.2	The SFPD should develop a general order review matrix predicated upon area of risk, operational need, and public concern to allow for timely update and review of prioritized orders.	1	Establish the matrix for review.	
			2	Publish a general order codifying the practices established under the recommendations for Finding 70.	
			3	Continuous improvement loop.	
Finding #	72	Department Bulletins are used as a workaround for the Department General Order approval process.	Compliance Measures		Status

Rec #	72.1	The SFPD should present all Department Bulletins that substantively change or countermand a Department General Order to the Police Commission before implementation and publish them on their website after approval is received.	1	Concurrent with the recommendations in Finding 70, establish a nimble process for the introduction of planned Department Bulletins to the Police Commission.	
			2	Publish Department Bulletins on the SFPD website to support transparency in practices.	
Rec #	72.2	All Department Class A Bulletins and any Department Bulletin that modifies an existing Department General Order should be posted on the SFPD's website.	1	Identify all Class A bulletins and bulletins that modify an existing DGO.	
			2	Publish all identified DBs on the SFPD website so that the information is easily accessed by the public.	
Rec #	72.3	The SFPD should limit the use of Department Bulletins to short-term direction and eliminate the authority to continue a Department Bulletin after two years.	1	Develop a policy that sunsets any DB after two years.	
			2	Track and ensure DBs identified in Rec 72.2 as modifying an existing DB to be incorporated into the DGO within the two year time frame.	
			3	Continuous review and audit loop.	
Finding #	73	The SFPD does not have an effective mechanism for determining whether an officer has accepted a policy and therefore could be held to account for its provisions.	Compliance Measures		Status
Rec #	73.1	The SFPD should develop a mechanism by which to track when a Department General Order or Department Bulletin has been accessed and acknowledged by a SFPD member.	1	Identified process to track receipt and acknowledgement of DGOs and bulletins.	
			2	Issue policy and procedure for members to access and acknowledge the receipt of DGOs and bulletins and provide a way to ask questions or receive additional guidance about the new policy.	

			3	Evidence of supportive and remedial action if deficiencies are found.	
			4	Ongoing review and/or audit loop regarding access and acknowledgement.	
Rec #	73.2	Once a mechanism is established, the SFPD should create a protocol for notification, noncompliance, and accountability.	1	Establish policy regarding discipline outcome for non-compliance in acknowledging department policy notifications.	
			2	Evidence of action taken to hold personnel accountable and remedial measures for non-compliance, when identified.	
			3	Continuous review and/or audit loop.	
Finding #	74	The SFPD does not provide sufficient training, supervision support, and guidance when releasing new Department Bulletins.	Compliance Measures		Status
Rec #	74.1	The SFPD should conduct a thorough and structured approach when creating new policies and procedures via Department Bulletins.	1	Establish a strategy and plan that reviews DBs for training and implementation needs.	
			2	Assess publication of new DBs to ensure adherence to policy.	
			3	Continuous review and implementation loop.	
Rec #	74.2	The SFPD should ensure that Bulletins are accompanied by appropriate training, supervision, and consistent reinforcement of the intended purpose of the policies.	1	Provide necessary training collateral for the appropriate level of training, e.g., roll call, individual awareness, and other needs.	
			2	Ensure supervisors acknowledge and consistently reinforce new policies.	
			3	Continuous review and implementation loop.	

Finding #	75	The SFPD does not devote sufficient administrative or command-level resources to the process of creating, implementing, maintaining, and updating Department General Orders and Bulletins.	Compliance Measures		Status
Rec #	75.1	The SFPD should task the Principled Policing and Professional Standards Bureau with overall responsibility for development, maintenance, training, and implementation planning for Department General Orders.	1	Task the PPPSB with overall responsibility for DGOs.	
			2	Establish policy and procedures for advancing DGOs.	
Rec #	75.2	The Written Directives Unit should be tasked to work with subject matter experts from DPA and the Police Commission to ensure policies are adopted in a timely manner and appropriately updated.	1	Task the WDU to support the recommendations in Finding 70 and 71 to facilitate timely update of DGOs.	
Rec #	75.3	The Written Directives Unit should be sufficiently staffed with personnel and resources to enable the unit to function as the project managers for Department General Orders at the direction of the Police Commission.	1	Establish a strategy to staff the Written Directives Unit with sufficient staff.	
			2	Develop and implement policy and procedures to support a Project Manager approach to the development of DGOs.	
			3	Ongoing and continuous improvement loop for process.	
Finding #	76	Although the SFPD internally provides Department General Orders and Department Bulletins that are electronically available, the documents are not easily accessible.	Compliance Measures		Status
Rec #	76.1	Department General Orders and Department Bulletins should be stored in a searchable digital central repository for ease of access by officers and for administrative purposes.	1	Establish a plan and timeline for the development of an electronic library for DGOs and DBs.	
			2	Task WDU with updates and maintenance of electronic library.	
			3	Establish continuous review and update of library.	

Rec #	76.2	The SFPD should provide department members access to an online electronic system for Department General Orders and Department Bulletins to provide timely updates, cross-referencing, and reporting and monitoring capabilities for managers.	1	Publish an electronic library of DGOs and DBs, concurrent with Rec 76.1.	
			2	Provide training on how to use and access library.	
Finding #	77	The SFPD does not conduct routine, ongoing organizational audits, even where such practices are established in policy.	Compliance Measures		Status
Rec #	77.1	The SFPD should prioritize auditing as a means to ensure organizational accountability and risk management and develop mechanisms to support such practices.	1	Identify key risks and operational issues within the SFPD and the individual units.	
			2	Develop a plan and strategy for audit and management review within the SFPD.	
			3	Implement the plan.	
			4	Continuous review and improvement loop.	
Rec #	77.2	The SFPD should develop an auditing plan and schedule for both routine and risk audits within 90 days of issuance of this report. Staffing, resources, and training need to be allocated to the process to ensure an active and robust auditing schedule.	1	Implement the plan identified in Rec 77.1.	
			2	Identify staffing and resource needs to ensure appropriate implementation.	
			3	Establish an audit schedule for routine and risk audits.	
			4	Continuous review and improvement loop, including evidence that the schedule is being met.	
Finding #	78	The SFPD does not engage in any outside evaluations of its practices, data, or reporting.	Compliance Measures		Status
Rec #	78.1	The SFPD should consider partnering with local academic institutions to evaluate its reform program, particularly as it seeks to implement the recommendations in this report.	1	Partner with academic institutions	
			2	Evidence of the partnerships going forward.	
			3	Tracking of evaluations of practices, data, reporting and reform progress.	
			4	Continuous review and improvement loop.	

Finding #	79	Evaluation of employee performance is not an institutionalized practice in the SFPD.	Compliance Measures		Status
Rec #	79.1	The SFPD should adopt a policy and implement the practice of completing regular performance evaluations of all department employees tailored to goals and objectives, job functions, and desired behavior and performance indicators.	1	Establish/re-establish a policy or procedure to conduct regular performance evaluations.	
			2	Ensure that policy or procedure allows for variation based upon role tasking and unit tasking.	
			3	Tailor performance evaluations to goals, objectives, functions and organizational strategy.	
			4	Establish policy and practice for performance evaluations.	
			5	Conduct regular performance evaluations.	
			6	Ongoing review and audit that evaluations are conducted.	
			7	Overall review of the evaluation process and improvement loop.	
Rec #	79.2	SFPD leadership needs to create a system to ensure that all personnel are being evaluated at least twice a year.	1	Establish/re-establish a policy of twice yearly performance evaluations.	
			2	Audit for adherence.	
			3	Hold personnel to account for compliance with evidence of remedial measures as necessary.	
			4	Continuous improvement loop.	
Rec #	79.3	The SFPD should use performance evaluations as an evaluation factor in promotions.	1	Work with the City HR to factor in performance evaluations for promotions.	
Finding #	80	The SFPD does not have internal protocols for collaboration with regard to criminal investigations conducted by the district attorney or the United States Attorney's Office for the Northern District of California.	Compliance Measures		Status

Rec #	80.1	The SFPD should create a policy governing the reporting of criminal activity and administrative misconduct uncovered during any type of covert investigation. Such policies will prepare the department for complex legal situations with multijurisdictional responsibilities for either criminal or administrative investigations into officer conduct.	1	Establish an internal policy and protocol for ongoing criminal investigations into SFPD officers.	
			2	Work with both the DA and the AUSA for the Northern District California to establish policies and protocols for criminal investigations into SFPD officers.	
Rec #	80.2	Clear communication protocols, responsibilities, and roles need to be established among the key partners responsible for investigations into criminal conduct and address administrative misconduct by officers.	1	Establish internal communications and investigations protocols and procedures regarding investigations into officers.	
			2	Train detectives, IA and DPA personnel on the internal and external policies and procedures regarding investigations into police officers.	
			3	Continuous review and improvement loop.	
Rec #	80.3	The SFPD should develop clear and defined policies and protocols to address reporting and confidentiality requirements for officers investigating criminal activity and administrative misconduct of other police officers uncovered during any type of investigation.	1	Establish policy regarding how and when officer criminal conduct is to be disclosed when uncovered as part of any SFPD investigation.	
			2	Ensure appropriate training to all investigative officers within the SFPD.	
			3	Identify specific consequences for failure to adhere to disclosure policies.	
			4	Ongoing review and audit.	
			5	Evidence of remedial actions if warranted.	