

Recommendation 36.2

TK

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To:

+7 others

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Dear Acting Captain Altorfer:

Our office has completed its review of the materials related to Recommendation 36.2 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 36.2: The SFPD should incorporate ongoing review and audit of anti-bias programs into a quarterly report that includes promising practices and lessons learned.

Response to Recommendation 36.2:

Earlier this year, SFPD's Training Division issued Unit Order 21-02, which codifies an ongoing process to review the Department's bias-related trainings. Under this Unit Order, the Officer in Charge of the Professional Development Unit (PDU) must assign an officer to attend bias-related classes at least once a quarter to review them for effectiveness, delivery, and quality of course instruction. The officer must also review the student evaluations of these bias-related trainings as part of their quarterly report. These evaluations are required under another recently issued Unit Order (21-01). Under this Unit Order, each student must complete an instructor/course evaluation form immediately after the conclusion of each block of instruction. The respective unit of the Training Division will then follow up with each student four months after the course to send a follow up training impact evaluation form. This form asks students questions about the impact of the course on their work. For example, the form asks the student

what impact the class has had on the student personally or professionally and whether, without having taken the course, the student would have made a different decision in a recent situation.

SFPD provided the California Department of Justice with its first quarterly report, issued in mid-April. This report reflects several meetings among instructors to ensure ongoing, ad-hoc review of trainings. Some of these meetings were with an external partner, the City of San Francisco's Department of Human Resources (DHR), which offers a Managing Implicit Bias for SFPD members. SFPD also provided emails demonstrating regular communication between DHR and SFPD. The summary of these meetings and the emails reflect robust review of SFPD's bias-related trainings as well as strong partnership with an external agency. Further, the observations and recommendations provided by the officer in the report were specific. For example, the officer noted that a recommendation that came out of discussions with DHR include looking at "course materials to find ways to reinforce healthy self-assessments of participants in relation to discovering implicit bias and ways to manage them." As required by Unit Order 21-02, the officer also completed an audit form, describing the officer's observations of a Bias and Racial Profiling (AO/CPT) course conducted on January 27, 2021.

SFPD's ongoing review process is in its preliminary stages and, as with other policies and practices implemented by SFPD in the past several months, this process requires ongoing oversight after Phase III. However, the quarterly report provided is thorough and demonstrates a commitment to ongoing review and improvement of its bias-related trainings.

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 these further.

Tanya

Hillard Heintze File Review Recommendation # 36.2

Finding # 36	The SFPD does not have an organizational performance approach to evaluating the impact of policies, practices, and procedures aimed at reducing bias within the department.
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Recommendation # 36.2	The SFPD should incorporate ongoing review and audit of anti-bias programs into a quarterly report that includes promising practices and lessons learned.
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Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

SFPD partners with the Department of Human Resources (DHR) to offer training on implicit bias. The DHR training supplements SFPD's programs and training established to reduce bias; and are reviewed on a continuing basis. Per Unit Order 21-02, an officer assigned to the Training Division will review evaluations of all bias training classes and submit a quarterly report to the Captain of the Professional Development Unit. The quarterly report will be reviewed for opportunities to improve training and to supplement, when necessary, the 96A report presented to the Police Commission.

Prior to submitting to the California Department of Justice for status review, the Department will need to make the following updates to the supporting documentation:

- 1) Update numbers regarding SFPD members who completed the DHR Implicit Bias Training. At the time this file was submitted, only 76% of department members had completed the training. If a deficiency exists, include written details on the department's plan to ensure completion of the training.
- 2) Attach a draft or completed Q1 2021 report. If none, provide written details explaining steps to ensure completion of Unit Order 21-02 requirements.

Compliance Measures	Status/Measure Met
1 Review/audit anti-bias programs.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2 Review on an ongoing basis.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3 Results incorporated into quarterly report.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4 Report includes promising practices, lessons learned, and plans for change based upon findings.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Administrative Issues

Compliance Issues

Note the updates needed to the supporting documentation on this recommendation's file in order to move forward for determination of substantial compliance by the California Department of Justice.



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Finding # 36: The SFPD does not have an organizational performance approach to evaluating the impact of policies, practices, and procedures aimed at reducing bias within the Department.

Recommendation # 36.2 The SFPD should incorporate ongoing review and audit of anti-bias programs into a quarterly report that includes promising practices and lessons learned.

Response Date: 04/20/2021

Executive Summary:

The department has instituted a review and audit system for anti-bias trainings and programs. A review of bias training programs shows the department is offering significantly more bias training, and achieving significant compliance in attendance, than in years past. The Training Division has instituted a two-phase evaluation system to review and audit all training classes, including bias classes. Evaluations are completed immediately after training is completed and again four months later. Evaluations completed directly after the course measure the quality of the course content and the efficacy of the instructor. The impact evaluations will measure how a student was impacted by the class and what they learned.

As part of an audit and review process, the Training Division's Professional Development Unit (PDU) has an officer assigned to it that will attend bias classes offered by the Training Division and also classes offered in partnership with the Department of Human Resources (DHR). This officer will audit/review a class at least once a quarter and complete an audit/review form. This PDU officer will also review evaluations submitted by SFPD students.

The Training Division, through a Unit Order, has instituted a quarterly review and audit of bias training programs. The above processes encompass the audit and review by PDU. The results of the audit and review are published by a PDU officer into a quarterly report memorandum. This quarterly report outlines the audit and review process utilized and also the promising practices, lessons learned and plans for change based on findings.

Any recommendations deemed necessary by PDU staff shall be also incorporated in the report. The quarterly report will be reviewed by the Officer in Charge (OIC) of the PDU, who will then forward it to the Commanding Officer of the Training Division for review and any necessary action.



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Compliance Measures:

1) Review/audit anti-bias programs.

A review of bias training and programs shows the department is offering more bias training than in years past and achieving significant compliance in attendance. This includes the Managing Implicit Bias class and Principled Policing and Implicit Bias Class. As of October 15, 2020 over 97% of sworn members and civilian members have taken the Principled Policing and Implicit Bias class.

As of October 15, 2020 over 76% of sworn members and civilian members with public contact have taken the Managing Implicit Bias class offered by the Department of Human Resources (DHR). It should be noted that the Managing Implicit Bias class is still actively being offered by DHR and members are constantly being enrolled. (See Attachment #1: Principled Policing and Implicit Bias & Managing Implicit Bias enrollment audit email). Attachment #2: SFPD Bias Training Comparison Grid).

The Training Division's Professional Development Unit (PDU) has an officer assigned to reviewing, coordinating and auditing all bias related training offered by the department and outside entities it partners with. This officer reviews both class evaluations and follow up impact evaluations as part of this audit. This assigned PDU officer also periodically attends classes to audit for effectiveness in delivery and quality of course and instruction.

The Training Division has an evaluation system for students to complete regarding any training class, including bias training. After the conclusion of each block of instruction, each student will complete the instructor/course evaluation form. Classes pertaining to bias are reviewed by PDU Staff. While this was a long-standing practice, a Unit Order issued by the Training Division spelled out the policy and procedures for the evaluations.

DHR works in partnership with the San Francisco Police Department to put on the "Managing Implicit Bias Class" for all sworn and civilian members in public contact positions. The class is instructed by DHR employees and evaluations are submitted directly to them. The PDU partners with DHR and facilitates signing up department members for the class. Because it is a DHR class, the evaluations are solicited and retained by DHR, but DHR forwards the evaluation response data to the PDU for review. (See Attachment #3: DHR evaluation response data)

In 2020, the Training Division developed a new process to review and audit the impact of training programs and further assess and review and audit quality of course and instruction. While the evaluations completed directly after the course measure the



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quality of the course content and the efficacy of the instructor, the impact evaluations will measure how a student was impacted by the class and what they learned.

Included in these evaluations are bias training programs, which are reviewed and audited by PDU. Four months after course completion, the respective unit of the Training Division responsible for the class will email a follow up training impact evaluation to students in order to audit all training classes for effectiveness of instruction and quality. This way the Training Division can determine what material was effective and meaningfully impacted students in the months after the training was completed. (See Attachment #4: Follow Up Training Impact Evaluations Unit Order)

2) Review on an ongoing basis.

Bias training programs are constantly reviewed with new classes and subjects being offered. As such, a Training Division Unit Order was drafted that requires a quarterly review and audit of bias programs.

An officer is assigned to the PDU to review evaluations for bias related training that is directly offered by the SFPD or via an external partner (DHR) on an ongoing basis. Evaluation reviews consist of both evaluations received on the final day of instruction, as well as training impact evaluations received 4 months later.

In addition, the assigned PDU officer shall continue to periodically attend classes at least once a quarter and liaison with internal and external instructors to review training programs. These "improvement loops" are offered whenever needed and is viewed as a partnership between the instructor and PDU to offer the best possible content and instruction.

An example from the above review and audit is where a PDU officer gave input regarding proposed new micro-training sessions put on in partnership with DHR. PDU suggested that these new trainings needed to remain "relevant, factual and brief while provide links/resources to delve deeper" and suggested a new format of training that addressed the gap. (See Attachment #5: Follow up email regarding instructor input improvement loop).

3) Results incorporated into quarterly report.

The PDU Unit has an officer assigned to reviewing and auditing all bias related training and subjects. This officer reviews training programs regarding bias provided to members of the San Francisco Police Department.

The above review and audit results, as instituted above, are to be incorporated into a quarterly report memorandum written by the above officer assigned to PDU. The report



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is reviewed by the Officer in Charge (OIC) of the PDU, who will then forward it to the Commanding Officer of the Training Division for review and any necessary action. (See attachment #6: Audit and Review of Bias Training Programs Unit Order)

4) Report includes promising practices, lessons learned, and plans for change based upon findings.

This report will include promising practices, lessons learned and plans for change based on the findings of the review/audit practice as stated above. "Improvement loops" between the Training Division and instructors will also be detailed in the report to ensure best possible content and instruction is presented.

The quarterly report will be due by the 15th of the month proceeding the close of the quarter (April 15, July 15, October 15, January 15 respectively). In addition, a class audit evaluation form and checklist will be completed and attached. Also, a copy of the department's Audit of Electronic Communication Devices for Bias is to be attached. (See attachment #7: Audit of Electronic Communication Devices for Bias example).

Any recommendations deemed necessary by PDU staff shall be also incorporated in the report. This report will be forwarded to and reviewed by the lieutenant of the PDU and the commanding officer of the Training Division. (See attachment #6: Audit and Review of Bias Training Programs Unit Order)

On April 13th, 2021 the SFPD received an email from Hillard Heintze stating that their review of documentation provided for Recommendation 36.2 is final, however they requested updates on two topics. Hillard Heintze asked that these updates be made prior to submitting to the Cal DOJ for review. Hillard Heintze requested the following:

1. "Update numbers regarding SFPD members who completed the DHR Implicit Bias Training. At the time this file was submitted, only 76% of department members had completed the training. If a deficiency exists, include written details on the department's plan to ensure completion of the training."
2. "Attach a draft or completed Q1 2021 report. If none, provide written details explaining steps to ensure completion of Unit Order 21-02 requirements."

In response to Hillard Heintze, and to address item one, the SFPD requested an updated audit of the DHR Implicit Bias Training. As of April 19, 2021 the percentage of sworn and civilian members with public contact that has taken Managing Implicit Bias class has increased to 83%. The class is offered by DHR to SFPD 4 times a month, with 20 students capable of being enrolled per class and is automatically offered to recruits in the academy prior to becoming sworn officers. It should be noted that as recruits enter the academy, they are counted in the SFPD's membership, but may have not come to that section of their



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academy training. As such, the percentage of members in compliance will continue to increase, and the department expects to achieve over 90% of member attendance by August of 2021. (See Attachment #8: Updated Managing Implicit Bias enrollment audit email – 4/19/21).

In response to Hillard Heintze, and to address item two, the SFPD Training Division completed a memo to address the completed quarter 1 report for 2021. This memo served to ensure completion of Unit Order 21-01 requirements. (See Attachment #9: Quarterly training review memo - 4.16.21).