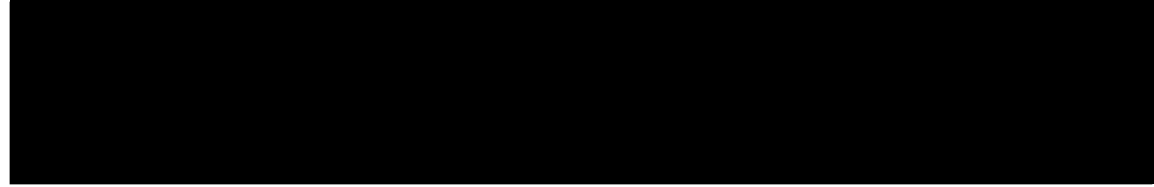


Recommendation 65.1

GM

Gabriel Martinez [REDACTED]

Wed 5/19/2021 7:46 AM



To:

- Tanya Koshy [REDACTED]
- McGuire, Catherine (POL);
- Scott, William (POL)

+8 others

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Dear Acting Captain Altorfer,

Our office has completed its review of the materials related to Recommendation 65.1 that were submitted to us as part of the collaborative reform process. This package focused on SFPD reviewing Department of Police Accountability (DPA) complaint reporting to make improvements across SFPD. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

Recommendation 65.1: The SFPD should develop a department-internal priority to regularly review and analyze OCC (DPA) complaint reporting to identify priorities for intervention in terms of workforce culture, training, policy clarification, or leadership development.

Response to 65.1: In February 2019, DPA began a weekly process of emailing complaints and information to SFPD known as the Henderson Report. Captains receive the complaints about officers under their command, and command staff receives the full report of all officers. Beginning on April 28, 2020, DPA also began providing SFPD with a quarterly report of complaints as well as complaint data. SFPD's Business Analysis Unit uses the data to create a quarterly trend analysis report. The report includes complaint breakdowns by watch, district, and allegation type. The processing of the trends report is codified in Unit Order 20-06, "Quarterly Department of Police Accountability Henderson and Complaint Trends Report" (December 17, 2020).

On December 8, 2020, SFPD issued Unit Order 20-05, "District Station Captains Quarterly Meeting Identifying DPA Complaint Allegation Trends and Remedying Steps." The Order requires captains to review the quarterly trend analysis from the Henderson Report and compare the statistics with the previous quarter's report. The report is presented quarterly during the monthly captains' meeting to discuss any problematic issues identified. Captains are required to document their actions in quarterly captains' memoranda, including exploring underlying causes of complaint trends, identifying possible solutions, documenting the implementation of solutions, and evaluating the success of measures taken. The Field Operations Bureau Lieutenant will audit the quarterly memoranda each year to ensure captains' compliance and will take corrective action if necessary. As a result of the captains' reviews of the Fourth Quarter 2020 trends report, captains identified complaint trends and proposed remedies, including roll-call trainings regarding discourtesy and debriefs, body-worn camera inspections, and having training supervisors review certain Department General Orders.

On May 15, 2019, SFPD published Department General Order (DGO) 2.04, Complaints Against Officers, outlining SFPD's procedures for investigating and processing complaints against officers and describing the Department of Police Accountability (DPA) procedures. The Order establishes a Disciplinary Review Board that meets quarterly to examine inefficiencies, policy gaps, and protocols for the complaint system and discipline process. The board consists of senior staff from SFPD, DPA and the Police Commission, including the Assistant Chief of Staff or designee from the Risk Management Office, the Deputy Chief of the Administration Bureau, and the Deputy Chief of the Field Operations Bureau.

The first disciplinary review board meetings were intended to set up the parameters and processes of the board. After an initial meeting on February 11, 2020, meetings were paused because of the Covid pandemic until September 30, 2020. A third meeting to finalize the setup of the board was held on November 12, 2020, and the first official board meeting occurred on December 18, 2020. Several issues from individual officer actions were raised by both IAD and DPA, including how firearms are handled at the range, how SFPD conducts searches at residences when only a juvenile is present, and how officers communicate with bystanders that are recording officers. DPA recommended policy changes to address these issues. IAD and DPA also identified complaint trends, including recurring issues with officers turning on body-worn cameras, search warrant issues, discourtesy, and interactions with limited English proficient individuals. SFPD and DPA agreed to nine recommendations stemming from these trends, including SFPD exploring modifying the body-worn-camera policy to allow Sergeants to regularly audit body-worn-camera footage in incidents that do not involve the use of force, SFPD requiring officers who receive sustained discourtesy complaints to go to specific training to address discourtesy, and ensuring SFPD training teaches that officers should not question claims from individuals that they are limited English proficient.

Based upon all the above, the California Department of Justice finds that SFPD is in substantial compliance with this recommendation. Please let us know if you have any questions or would like to discuss further. Thank you.

Finding # 65	The SFPD does not sufficiently analyze Department of Public Accountability (DPA) reports and analyses of its complaints, investigations, and case dispositions.
Recommendation # 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.

Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

The SFPD does not directly access any of the DPA data – it is a client as far as information being shared. The department and DPA have engaged in significant work since the original assessment to better inform each other and the community and to align their approach to what is essentially a shared process – the investigation and recommendation of discipline for officers who engage in misconduct.

As for compliance measure one – the SFPD does not have a collection plan rather than a receipt and delivery plan. This is compliant with way the data is shared, as one of the early recommendations was to share a database and this did not occur. The department established a review plan under policy and this is now in place.

As for compliance measure two – the department lays out an evaluation of review and receipt of data that culminates with the Henderson Report and its review by the department’s Business Intelligence Unit to evaluate for trends and graphical presentation in April 2020. From there they developed a Trend Analysis report that will be shared, and with action tasking as a result of discussions at the Captain’s Meetings, held quarterly.

Compliance measure three is supported by evidence of sharing at the executive and at the Captain’s level. The report has had a few iterations and was more closely held in its early versions, but the department provides evidence of sufficient sharing of not only the report, but also visual depiction of trends. These trends are to be discussed and analyzed at the Captain’s meeting.

Compliance measure four is supported by the order and the program construct. The process of engaging and reviewing in complaint trends has spread beyond that of the Captain’s quarterly meeting to include a discipline review board (DRB), jointly staffed by the DPA and the SFPD. Both processes are directed toward identifying trends with appropriate resolution. The Captain’s approach is more operations focused – actions taken to reduce complaints while the DRB is focused on larger organizational issues, in addition to specific matters. The DRB actions are also shared at the captains meeting. It is early to identify specific improvements, but a run of recommendations is identified coming from the initial DRB and issue identification is part of the notes from the March quarterly Captain’s meeting.

As for compliance measure five – the Captains are tasked under the Field Operations Bureau Order 20-05 with authoring a Quarterly Memorandum explaining their analysis, accounting for any changes in complaint trends, and detailing their plans to mitigate any problematic trends. The memorandum is then submitted through the chain of command up to the Deputy Chief of the Field Operations Bureau. Annually, the Lieutenant of FOB will audit the memorandums to ensure they confirm with the order and to assess whether there are any deficiencies in the memorandums. If identified, the Deputy Chief of the Field Operations Bureau will be noticed to take corrective action. In that this is new and has not flowed through an annual process as of yet – the outcomes cannot be measured. However, there has been evidence of near term focus and conversation in assessing and addressing trends. The DRB has already made recommendations with some identified responses that have not yet been accomplished.

Compliance Measures		Status/Measure Met
1	Establish a data collection and review plan for DPA complaints.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2	Task personnel with review and analysis.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3	Share internally the trends and issues identified.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4	Continuous improvement loop as to the issues identified.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5	Evidence of identification of and response to issues and trends.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Administrative Issues

Compliance Issues



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Finding # 65: The SFPD does not sufficiently analyze Office of Citizen Complaints (Now Department of Police Accountability) reports and analyses of its complaints, investigations, and case dispositions.

Recommendation # 65.1 - The SFPD should develop a department-internal priority to regularly review and analyze OCC (DPA) complaint reporting to identify priorities for intervention in terms of workforce culture, training, policy clarification, or leadership development.

Response Date: 03/19/2021

Executive Summary:

On Thursday March 4, 2021, SFPD Professional Standards members participated in a conference call with members of Hillard Heintze and the Department of Justice. During the prescreening, suggestions and guidelines were discussed for this recommendation as described below.

Hillard Heintze discussed the recommendations jointly and had three main questions for SFPD about these recommendations: (1) how the department came to its plan regarding Henderson data; (2) how SFPD acted upon the data since 2017; and (3) whether the captains' quarterly meeting scheduled for today is occurring. SFPD responded by explaining the evolution from the Morning Report to the Henderson Report and how SFPD continually reviewed and improved the process. Hillard Heintze thought the explanation was helpful and also asked that SFPD include in the Form 2001 limitations SFPD has recognized and is working on. SFPD also verified that the captains' quarterly meeting is occurring today. For continuously improving the data that is reviewed, SFPD would like to add more context (for example, how protests in a district might effect the data). SFPD plans to gather the supporting documents for inclusion in the packages over the next week.

Prior to February 2019, the DPA had been providing the department with scanned copies of recent complaints on CD-ROMs (The Morning Report). The information on the CD-ROMs was not searchable and there was no data to extract for analysis.

In February 2019, the DPA revised their format, which became the "Henderson Report". The Henderson Report was emailed weekly to SFPD Command Staff and Captains of the named members. The information within the Henderson Report was not formally acted upon by the department and there did not seem to be a clear explanation of what the Henderson Report was regarding and how it could be utilized. Also, at the time, DPA appeared to have used an outdated email distribution list that did not have current members of the Command Staff nor the appropriate Station/Unit Captains, this has been corrected.

In March 2020, SFPD reached out to DPA and asked if they would be able to provide a Quarterly version of the Henderson Report as well as the underlying data (contained in an



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Excel spreadsheet). Although the data was limited in scope, SFPD believed it would be of use for rudimentary examination/analysis of complaint trends. DPA's categories of misconduct allegations were too broad and non-specific: e.g. Neglect of Duty could be used for numerous types of allegations.

On April 28, 2020, DPA was able to provide the SFPD with the underlying data from the new quarterly version. That data was then provided to SFPD's Business Intelligence Unit (BI) to evaluate for possible trends and graphical presentation ("Trend Analysis-Henderson Report")

The first presentation of the Q3 2020, Quarterly Trend Analysis Henderson Report occurred on November 5th, 2020 at the Field Operations Bureau (FOB) Quarterly Captains Meeting. Going forward, the Quarterly Trend Analysis Henderson Report shall be presented and discussed at all Quarterly Captains Meetings, facilitated by the Deputy Chief of FOB.

After the first presentation, the report was reviewed and reassessed for clarity and ease of understanding. On March 4, 2021, the revised report was provided to the Q1 2021 Captains Meeting. **(Attachment #1)** *Captain Quarterly Meeting Minutes*

Per FOB Bureau Order 20-05, after the presentation of the Quarterly Trend Analysis Henderson Report Captains will be tasked with using the new report to compare statistics from the previous quarter. **(Attachment #2)** *Henderson Report Q3 2020*

In addition to the quarterly review of the Trends Analysis Henderson Report by district station Captains, in May 2019, the Department updated DGO 2.04 Complaints Against Officers to include a requirement that DPA and SFPD meet quarterly to discuss trends in complaints. The DGO outlines the creation of a collaborative Discipline Review Board (DRB) that meets quarterly to discuss trends in DPA and IAD complaints as well as ways to remedy any problematic trends. The quarterly DRB meetings are attended by representatives of the DPA, SFPD, and the Police Commission. The first three DRB meetings, which occurred in February, September, and November of 2020, were dedicated to creating an agreed upon format and schedule for future meetings. The first substantive DRB meeting occurred on December 12th, 2020 and a follow-up memorandum was submitted to the Chief of Police with a summary of the trends/cases discussed and nine recommendations to remedy them.

The summary of the DRB trends/cases discussed and nine recommendations to remedy them were also discussed at the March 4, 2021 Captains Meeting. **(Attachment #3)** *San Francisco Police Disciplinary Review Board Presentation*

Compliance Measures:

1) Establish a data collection and review plan for DPA complaints.

On December 21, 2020 SFPD Professional Standards Members participated in a conference call with members of Hillard Heintze and the California Department of



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Justice. During the prescreening, suggestions and guidelines were discussed for this recommendation as described below.

Cal DOJ gave comments that applied to recommendations 65.1, 65.2, and 67.1. Cal DOJ asked about its analysis of complaints, and SFPD explained that the Henderson Reports are the only information DPA gives to SFPD regarding in progress complaint investigations and that SFPD does not have access to any additional information. Cal DOJ requested that SFPD include that limitation, so the public is aware.

The DPA compiles a list of the complaints it receives and creates a document called the Henderson Report in order to have a complete list of complaints and enable the identification of trends. The Henderson Report information is the only data the DPA provides to the Department regarding complaint trends. However, the DPA and SFPD both attend quarterly DRB meetings during which the DPA makes a presentation on complaint trends for the past quarter. Please see compliance measure 4 for further discussion of these meetings.

Since February 2019, the DPA has disseminated the Henderson Report to the Command Staff and Captains of subject officers via email on a weekly basis. The Captains only receive the portion of the report that is specific to accused members under their command. The Command Staff receives the full report of all accused SFPD members. **(Attachment #4)** *Example of Weekly DPA Henderson Report (redacted)*

A quarterly version of the Henderson Report is emailed to SFPD in two versions: one formatted identically to the weekly version and a data only version to allow for graphing and analysis of the data. Risk Management personnel are tasked with providing the data to the Business Intelligence Unit (BI) for trend analysis. **(Attachment #5)** *IAD Unit Order 20-06*

2) Task Personnel with review and analysis.

The Business Intelligence Unit (BI) is tasked with creating a Quarterly Trend Analysis Henderson Report from the Quarterly Henderson report. The report includes categorizing and visualizing the complaint data to assist in identifying trends and potential issues. This report is divided by watch, district, and citywide categories and is distributed on a quarterly basis to the Command Staff and District Station Captains. The ability of the Department to generate the Trend Analysis report is new, as prior to upgrading the Department's data analysis system in September of 2020, the data provided by DPA could not be integrated into or analyzed by the Department's system.

Once potential issues are identified in the Trend Analysis Report, they can be proactively addressed by Command Staff and District Station Captains. For example, in the latest analysis, Central Station had a higher number of complaints than other stations, while complaints had decreased for the Department as a whole. **(Attachment #6)** *Trend Analysis Henderson Report*



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3) Share internally the trends and issues identified.

On December 21, 2020 SFPD Professional Standards Members participated in a conference call with members of Hillard Heintze and the California Department of Justice. During the prescreening, suggestions and guidelines were discussed for this recommendation as described below.

Hillard Heintze and Cal DOJ requested more information regarding what SFPD does with the information it receives in terms of concrete actions it has taken. SFPD explained that the process is new and that responsibilities are identified in the Bureau Order. SFPD will circle back with whether any actions were taken as a result of the last quarterly review.

Following the call, Cal DOJ realized that it had additional feedback to provide related to Bureau Order 20-05. Specifically, Cal DOJ notes that the Order states the Lieutenant "shall be responsible for accounting for and maintaining a log of Captains Quarterly Report." SFPD should spell out in this Bureau Order – or in whatever supplementary documentation makes sense to the Department – that the Captains are required to prepare a quarterly report that specifically addresses the quarterly discussions referenced in that Bureau Order. Further, the Bureau Order states that the Lieutenant "shall conduct an audit and review of the Captain's quarterly report in December of each year and furnish a report to the Deputy Chief of Field Operations Bureau on the outcome of the audit." SFPD should also make the scope of the audit clear (that is, what sort of deficiencies/issues is the Lieutenant looking for in their audit?).

Per FOB Bureau Order 20-05, the presentation of the quarterly Henderson Report shall be done at the Field Operations Bureau's (FOB) quarterly Captains meeting. On November 5, 2020, the DPA Complaint "Trend Analysis Henderson Report" was presented to the 3rd Quarter FOB Captains meeting for the first time. In the report, Central Station was shown to have higher volume of complaints compared to other stations, however complaints had decreased for the Department as a whole. In subsequent meetings, these figures and others will be compared to the next report by quarter and the success of steps taken to address them can be evaluated. (See **(Attachment #7)** FOB Unit Order 20-05 "District Station Captains Quarterly Meeting Identifying DPA Complaint Allegation Trends and Remediating Steps. **(Attachment #8)** Third Quarter Captains Meeting Agenda

The goal of identifying DPA complaint trends and presenting them at the FOB quarterly Captains meeting is to proactively remedy problem behavior and seek methods to eliminate such behavior in the future on an organizational level as well as by district.

Due to the fact that the first presentation of the Trends Analysis Henderson Report occurred on 11/05/2020, there has not yet been an opportunity for quarterly comparisons to be made. After the next FOB Quarterly Captains Meeting, District Station Captains will begin quarterly comparisons based on trend analysis and author Memorandums documenting their corrective actions and findings. The next Quarterly



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Captains Meeting is scheduled for March 4th, 2021 ([Attachment #9](#)) *Calendar Screenshot of Scheduled March 2021 FOB Captain's Meeting*

FOB Unit Order 20-05 tasks Captains with addressing issues affecting their commands and documenting their actions in their Quarterly Captain's Memorandums. FOB Unit Order 20-05 was updated to conform to suggestions from the Cal DOJ and Hillard Heintze made during prescreen on 12/20/2020. ([Attachment #7](#))

Moving forward, per FOB Unit Order 20-05, after they are furnished with the Trend Analysis Henderson Report at the Quarterly Captains meeting, Captains are to:

- a) Identify DPA complaint and allegation trends.
- b) Compare trends on a quarterly basis for a global perspective and any re-occurring themes.
- c) Explore the potential underlying causes behind the undesired behavior (ex: training issues and opportunities, supervisory or leadership deficiencies, etc.).
- d) Identify remedies and solutions to behavior.
- e) Implement solutions and document their effectiveness, or lack thereof, with new, goal-oriented outcomes in mind.
- f) Evaluate the success of measures taken at Quarterly Captains Meetings and compare Trend-Analysis Henderson Reports on a quarterly basis.
- g) Ensure tracking mechanisms are enacted at the station level for follow-up audits and quarterly comparison review.
- h) Prepare a quarterly Memorandum to the Deputy Chief of Field Operations regarding the action plans that were put into place and account for any decreases or increases in DPA complaints for the prior quarter. The memorandum shall include the above listed topics (a-g).

Per FOB Unit Order 20-05, the Lieutenant of FOB shall be responsible for maintaining a log of the Captains' Quarterly Memorandums on the above issues and conducting an audit of the memorandums once a year in December. The audit will ensure:

- a) Quarterly memorandums depict specific strategies used and measure the effectiveness of those strategies
- b) Quarterly increases and decreases in complaints within the Captain's district are documented in the memorandum
- c) The items in Section II of the unit order (see above listed tasks) are considered and discussed in the memorandum

If any issues are identified in the audit of the memorandums, the Deputy Chief of FOB will take appropriate corrective actions to rectify them.

Via the quarterly Captains meeting, the Training Division will also be provided copies of the quarterly Henderson Report to assist in identifying potential training opportunities.



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4) Continuous improvement loop as to the issues identified.

On December 21, 2020 SFPD Professional Standards Members participated in a conference call with members of Hillard Heintze and the California Department of Justice. During the prescreening, suggestions and guidelines were discussed for this recommendation as described below.

SFPD also suggested that the Disciplinary Review Board may have relevant processes about SFPD taking action based on reviews of complaints. Cal DOJ and Hillard Heintze thought that adding this information would be helpful.

Per the new FOB Bureau Oder 20-05, Captains are tasked with addressing issues affecting their commands and are to document their actions in their Quarterly Captain's Memorandum. As detailed above, the Lieutenant of Field Operations shall conduct an audit and review of the Captain's Quarterly Memorandums at the end of December of each year and furnish a report to the Deputy Chief of Field Operations Bureau on the outcome of the audit. If there are deficiencies identified in the audit, the Deputy Chief of FOB will take the necessary corrective actions. (Attachment #7) See FOB Bureau Order 20-05

On May 21, 2019, the Police Commission adopted Resolution 19-40, which is an MOU of understanding between the DPA and the SFPD regarding the updated Department General Order 2.04. (Attachment #10) MOU between DPA and SFPD

The updated DGO 2.04 established a plan for ongoing collaboration between SFPD and DPA called the "Discipline Review Board" (DRB). The board consists of members from SFPD, DPA and the Police Commission. The protocol for the members is to have quarterly meetings to examine:

- Aggregate trends related to DPA and IAD complaints, both alleged and sustained.
- Policy failure or training failure cases closed in the prior quarter
- The Department in consultation with DPA will select sustained cases from the previous quarter for review to determine the need for training or policy changes
- SFPD and DPA recommendations

The DRB shall consider whether any policy, procedures, or training needs to be revised or added as a consequence of the subject matter reviewed during the meetings. The DRB shall report quarterly to the public and Police Commission whatever policy and training changes it recommends, and the measurement of the success or failure of each change. (Attachment #11) DGO 2.04 Complaints Against Officers

The first DRB meeting was held on February 11, 2020 to discuss the parameters set forth in DGO 2.04 Section 2.04.08. The following meeting was scheduled to occur on March 17, 2020. Due to the Covid-19 pandemic, the March meeting was put on hold



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until September 30, 2020. The third meeting was held on November 12, 2020. These first three DRB meetings were held to develop the protocols for the collaboration detailed in DGO 2.04 and did not involve substantive discussion of trends or presentations of specific cases by SFPD or DPA. (Attachment #12) *DRB Meeting Minutes for 02/11/20, 09/30/20, and 11/12/20*

The first substantive DRB meeting occurred on December 18, 2020. The meeting was attended by the Assistant Chief, Commander of Risk Management Office, The Deputy Chief of the Administration Bureau, The Deputy Chief of the Field Operations Bureau, A member of the Police Commission, and the Director of the DPA. During the meeting, the topics set forth in updated DGO 2.04 were discussed. Presentations were made by both DPA and SFPD regarding trends in complaints, complaints that were related to policy/training failures, and specific cases were reviewed in relation to policy changes that might need to be made in order to prevent similar cases in the future. SFPD and DPA both made recommendations about best practices and policy/training changes that could be made going forward. (Attachment #13) *DRB Meeting Minutes for 12/18/20*

The items discussed during the December 18, 2020 DRB meeting resulted in policy and training recommendations that were submitted for approval following the meeting. A follow-up memorandum was written on December 28, 2020 and was sent up the chain of command to the Chief of Police. The memorandum outlined the cases and trends discussed during the DRB meeting and submitted nine recommendations from the DRB for the Chief to review and possibly implement. Through the discussion during the DRB meetings and recommendations sent to the Chief in a follow-up memorandum, the Department will have a continual opportunity to engage in an improvement loop of review and address new complaint trends in a timely fashion. (Attachment #14) *4th Quarter 2020 DRB Meeting Memorandum*

5) Evidence of identification and response to issues and trends.

On November 5, 2020, the DPA Complaint "Trend Analysis-Henderson Report" was presented to the 3rd Quarter FOB Captains meeting for the first time. Central Station was shown to have higher volume of complaints compared to other stations, while complaints had decreased for the Department as a whole. In subsequent meetings, these figures and others can be compared to the next report by quarter and the success of steps taken to address them can be evaluated. The response of the Captains at a district level will be documented in the Quarterly Captain's Memorandums and audited by the Lieutenant of FOB. This type of consistent review and analysis will allow the Department to respond quickly and proactively to any undesirable trends as well as allowing it to track its progress in adopting successful measures in a continuous improvement loop at the district level.

On December 18, 2020, the first substantive DRB meeting took place. During the meeting, the topics set forth in updated DGO 2.04 were discussed. Presentations were made by both DPA and SFPD regarding trends in complaints, complaints that were related to policy/training failures, and specific cases were reviewed in relation to policy



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changes that might need to be made in order to prevent similar cases in the future. SFPD and DPA both made recommendations about best practices and policy/training changes that could be made going forward. A follow-up memorandum summarizing the content and recommendations discussed at the DRB meeting was written and sent through the *chain of command* to the Chief of Police. He will be able to review the memorandum and decide what recommendations to implement. By having quarterly DRB meetings and ensuring that the Chief is notified about their findings, the SFPD is able to engage in a continuous improvement loop on a macro level that incorporates findings from across the Department as well as from the DPA.

After completing their comparison, Captains must author a Quarterly Memorandum explaining their analysis, accounting for any changes in complaint trends, and detailing their plans to mitigate any problematic trends. The memorandum is then submitted to the Deputy Chief of the Field Operations Bureau. The Lieutenant of FOB is responsible for maintaining a log of the memorandums to ensure their timely completion, and in December of each year, the Lieutenant of FOB will perform an audit to ensure that the memorandums include the necessary information detailed in FOB Bureau Order 20-05. Should the Lieutenant of FOB discover any deficiencies in the memorandums, they will alert the Deputy Chief of the Field Operations Bureau, who will take corrective action, as necessary.

As a result of the March 4, 2021, Captains Meeting, District Station Captains completed and submitted their memos to the Deputy Chief of FOB, as outlined in FOB Bureau Order 20-05. **(Attachment #15)** *Captains Quarterly Meeting Memorandums*