

## Recommendation 28.3

Tanya Koshy [REDACTED]

Mon 3/15/2021 1:01 PM

[REDACTED]

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Dear Acting Captain Altorfer:

Our office has completed its review of the materials related to Recommendation 28.3 that have been submitted to us as part of the collaborative reform process. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

Recommendation 28.3: The SFPD should establish routine, ongoing roll-call training requirements for supervisors on key leadership issues, including their role in promoting fair and impartial policing.

Response to Recommendation 28.3:

SFPD issued a Professional Development Unit (PDU) Order (20-01) that requires roll call training once a monthly, or as necessary. The Training Division determines the content of the roll call training, which is informed by consultations with internal and external stakeholders, changes in caselaw, emerging trends, lawsuits, and complaints, among other sources. The PDU provides the training coordinator for each unit with the roll call training materials and the training coordinators must ensure that the training is administered during line-ups or staff meetings. Training coordinators are also responsible for ensuring that members within their unit have participated in training, by directing them to sign off on completion in SFPD's cloud-based policy storage system and by making sure that members who were on leave complete the training when they return to duty. The Staff Inspections Unit supports compliance by conducting periodic reviews to determine any noncompliance. If any member has not complied with the roll call training, the Staff Inspections Unit will notify the member's Commanding Officer to determine corrective action.

In 2020, SFPD issued six roll call trainings that address various themes related to fair and impartial policing and other leadership issues. While these roll call trainings target all SFPD members, these trainings include a component directed towards Supervisors. For example, SFPD issued a roll call training on its new strategic statement on providing safety with respect for all community members. In addition to generally describing the strategic statement, and how it is a distilled version of the Department's Strategic Plan, the roll call training also included a specific component for supervisors: It advised supervisors to keep a copy of SFPD's strategic plan on their desks and use language within the strategic plan in the preparation of Captain's commendations for officers. Another example is a roll call training on receiving complaints. The training provided information on how to accept complaints and the purpose of respectfully taking down complaints from a member of the public. Like the strategic statement roll call training, this training also included a component specifically for supervisors: It advised supervisors on the process for receiving a complaint against an officer.

SFPD has also developed a new training module that will be a part of the two-week Sergeant's Promotional Course that newly promoted sergeants must take. The training module is entitled "Role of the Sergeant: Leading, Mentoring, and Engaging in the Pursuit of Bias-Free Policing & Harassment and Discrimination-Free Workplaces." The module will discuss, among other issues, the key takeaways of the newly revised Department General Orders 5.17 (Bias-Free Policing Policy) and 11.07 (Prohibiting Discrimination, Harassment, and Retaliation Policy) and the role supervisors play in upholding these policies.

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

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<b>Finding # 28</b>	<b>The SFPD’s failure to fully and adequately address incidents of biased misconduct contributed to a perception of institutional bias in the department.</b>
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<b>Recommendation # 28.3</b>	The SFPD should establish routine, ongoing roll-call training requirements for supervisors on key leadership issues, including their role in promoting fair and impartial policing.
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<b>Recommendation Status</b>	<b>Complete</b> Not Started	Partially Complete No Assessment	In Progress
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**Summary**

The San Francisco Police Department, via Professional Development Unit Order 19-152, established on-going roll-call training for all personnel, including supervisors. The training focuses on fair and impartial policing; roll-call training regarding DGO 11.07 Discrimination informs supervisors of expected duties when addressing or conducting an inquiry regarding fair and impartial policing.

The Professional Development Unit seeks input from various department sources, including training participants, to ensure education and training is relevant and will make modifications as needed.

Compliance Measures	Status/Measure Met
1 Develop scheduled, on-going roll-call training requirements for supervisors.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2 Ensure the training addresses key leadership issues and the role of supervisors in promoting fair and impartial policing.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3 Evidence of scheduled, ongoing roll call training on fair and impartial policing.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4 Evidence of supportive and remedial action if deficiencies are found.	✓ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

**Administrative Issues**

**Compliance Issues**



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**Finding #28:** The SFPD's failure to fully and adequately address incidents of biased misconduct contributed to a perception of institutional bias in the department.

**Recommendation #28.3:** The SFPD should establish routine, ongoing roll-call training requirements for supervisors on key leadership issues, including their role in promoting fair and impartial policing.

**Response Date: 01/06/2021**

### Executive Summary:

The SFPD has addressed this recommendation with a comprehensive Academy Unit Order entitled "Roll Call Training Development, Issuance, Procedures, and Compliance" (see Attachment 1). Roll Call training expectations were communicated to the entire Department through Department Bulletin 19-152, which is a reissuance of 17-216 indicating over 3 years' worth of the Department's prioritization of roll call training (see Attachment 2). To assist Training Unit Coordinators, "Roll Call" distribution, access, and compliance were transformed from hard-copy documents and hand-gathered signatures to digital delivery and digital sign-off in HRMS. This was memorialized and mandated in Department Notice 20-081 dated 05/05/20 (see Attachment 3). Over the past 2 years, there are several examples of ongoing roll call training specific to key leadership issues (see Attachment 4) and in promoting fair and impartial policing (which includes specific leadership-focused sub-lessons entitled "Supervisory Responsibility") (see Attachment 5). Since the start of 2020, there have been 6 Roll-Call trainings that have been distributed in this manner, are digitally posted & appear in the "SFPD Self Service" queue of documents to be signed, and compliance was audited (see Attachment 6). In addition to the Academy's roll-call training offerings in a variety of topics, roll-call trainings were additionally enhanced and transformed with a monthly publication entitled "Educational Pathways and Training Links." These pathways address key leadership dimensions, including a specific column heading entitled: "Leadership Track/Essential," which is directed to enhance supervisors' knowledge, skills, abilities, aptitudes, and traits in key areas, including areas covered under this recommendation (see Attachment 7).

Ongoing training on these topics is done in other formats that enhance and reinforce roll-call training lessons on key leadership issues for supervisors:

- Entry-level supervisors have an internal mandatory "Sergeant's Promotional Course" that includes "EEO Training for Supervisors" (see Attachment 8),
- An external mandatory "Supervisory Course" from California POST that includes modules on "Communications in a Diverse Workforce," "Ethical Decision Making," and "Values." (see Attachment 9), and



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-A yearly, mandatory, implicit bias training for all sworn and civilian supervisors (see Attachment 10).

Looking into the near future, all supervisors, beginning in 2021, will participate in a 4-hour "Bias and Racial Profiling" facilitated group course in the new biannual in-service training cycle (called Continuing Professional Training) (see Attachment 11). Newly revised Department General Order 11.07 (Rev. 5/20/20), includes administrative remedies for and toward supervisors "if deficiencies are found" (see CM4, below), as well as ongoing training requirements on fair and impartial policing tenets (see Attachment 12). Training Unit Coordinator Sergeants met virtually with the Academy's Professional Development Unit Staff to discuss their role, duties, responsibilities, and auditing procedures in a webinar on 10/01/20 (see Attachment 13).

The two most recent roll-call trainings, where supervisors are trained in the step-by-step process of detection, intervention, and reporting requirements related to policies that directly prohibit Bias-Based Policing (DGO 5.17) and Prohibiting Discrimination, Harassment, and Retaliation (DGO 11.07) were issued in December of 2020 (see Attachment 14).

Reinforcing expectations and guiding newly promoted sergeants with strategies that model, coach, train, and emphasize key leadership issues, especially their role in promoting principled and fair and impartial policing, will occur during the Sergeant's Promotional Course. This module (and accompanying expanded course outline) is entitled: "Role of the Sergeant: Leading, Mentoring, and Engaging in the Pursuit of Bias-Free Policing & Harassment and Discrimination-Free Workplaces" (see Attachment 15).

### **Compliance Measures:**

#### **Compliance Measure 1: Develop scheduled, on-going roll-call training requirements for supervisors.**

On Thursday 10/29/20, members of the SFPD Profession Standards Unit completed a technical guidance meeting with Cal DOJ and Hillard Heintze to discuss Recommendation 28.3. The following feedback was presented during this meeting:

"This is a recommendation for which we provided just technical assistance. The draft form 2001 generally looks good. For Compliance Measure 1 (Develop scheduled, on-going roll-call training requirements for supervisors.) Cal DOJ asked whether there is any roll call training specifically designed for supervisors, SFPD noted that the trainings were for all personnel with specific components of those trainings targeted to supervisors. Hillard Heintze asked SFPD to include trainings that related to what a supervisor should do when they get a complaint of bias. Captain Hart noted that a roll call training on DGO 11.07 is coming up and touches on that issue. SFPD will include information and documents related to that upcoming training—as well as other trainings that are coming up—in the final package. "



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On Monday 1/11/21, members of the SFPD Profession Standards Unit participated in a prescreen meeting with Cal DOJ and Hillard Heintze to discuss Recommendation 28.3. Cal DOJ and Hillard Heintze both agreed that this recommendation is complete.

### Steps Taken to Address CM1:

- 1) A comprehensive Academy Unit Order entitled "Roll Call Training Development, Issuance, Procedures, and Compliance" (see Attachment 1). This ensures that Academy staff assigned to the Professional Development Unit (PDU) will continue to develop specific, ongoing, and timely roll-call trainings on key leadership principles as directed by Department Bulletin 19-152 (see Attachment 2). PDU recognized the inefficiency of hard-copy distribution, manual signature collection for compliance, and manual auditing procedures, so procedures were digitized and incorporated into Department Notice 20-081 (see Attachment 3). Now, Roll Call training can be easily distributed to all members (including supervisors), compliance easily accomplished, instant verification of course completion in SFPD's HRMS (or PowerDMS) system, and easily audited. There have been 6 of these Roll Call Training documents pushed out to all sworn, non-sworn, and reserve officers on a variety of key leadership topics of relevance to supervisors and compliance was audited (see Attachments 4 through 6)
- 2) On September 5<sup>th</sup>, 2020, the Department's Field Operations Bureau went to a modified "platooning" schedule which created bi-weekly, "training day" opportunities. To support this initiative, monthly Roll Call training was transformed into a monthly training suite entitled "Educational Pathways and Training Links," whose purpose is to identify and enhance key leadership principles that not only apply to supervisors, but formal, informal, and future leaders in the organization. In each of the documents, distributed on September 8<sup>th</sup> and October 8<sup>th</sup> respectively, there is a chart that identifies *High Priority*, *Recommended*, and *Leadership Track/Essential* courses, articles, and links. The overarching theme for the September publication was incident command; October's publication included crowd control, advanced investigative techniques, and key leadership issues on police culture, life-long learning, emotional intelligence, and risk management (see Attachment 7).
- 3) Supervisors are required to participate in "Roll Call Training" lessons that are pushed-out digitally for electronic completion and compliance, even if they are not in assignments that have "roll calls." In order to enhance, reaffirm, and acculturate these key leadership issues beyond roll call, there are many different training avenues that are utilized to train and reinforce these important concepts for all members--especially supervisors--including: SFDHR's "Managing Implicit Bias" course, Principled Policing, in mandatory promotional courses (see Attachments 8 & 9), a yearly mandatory on-line "Implicit Bias" course (see



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Attachment 10), in biannual mandatory CPT training (see Attachment 11), and in training requirements outlined in DGO 11.07.07. (see Attachment 12).

- 4) Newly-promoted supervisors, during their two-week "Sergeant's Promotional Course," will participate in a module entitled: "Role of the Sergeant: Leading, Mentoring, and Engaging in the Pursuit of Bias-Free Policing & Harassment and Discrimination-Free Workplaces." This module will review key policies, procedures, and practices in the organization and then will empower newly-promoted Sergeants with insights on supervision, coaching, mentoring, engagement, demonstrating respect and dignity, and mandated reporting requirements that will empower and intentionally ensure a culture and a climate, both within and outside of the organization, that is free from bias, discrimination, and harassment (see Attachment 15).

### **Compliance Measure 2: Ensure the training addresses key leadership issues and the role of supervisors in promoting fair and impartial policing.**

- 1) A key leadership issue for the role of supervisors is to promote fair and impartial policing through the strict, proper, and effective application of all policies, especially those that prohibit discrimination, harassment, and retaliation internally and those that prohibit bias-based policing of those we serve. To ensure that supervisors clearly understand their role, responsibility, and the critical nature of the actions they take in response to violations of DGO 5.17 (Policy Prohibiting Biased Policing) and DGO 11.07 (Prohibiting Discrimination, Harassment, and Retaliation), two comprehensive roll-calls were authored and are set for imminent distribution to all sworn and non-sworn members and supervisors (see Attachment 14)
- 2) The content of this important Roll-Call Training is of existing policies, including DGO 5.17 and DGO 11.07 (see Attachments 1 through 3). This has been demonstrated over time through existing roll-call trainings developed over the past 2 years (see Attachments 4 & 5), has continued through 2020 (see Attachment 6), was incorporated in 9/2020 and 10/2020 publications with leadership-focused training courses, links, and seminars (see Attachment 7) and was reinforced through additional avenues of training (see Attachments 8 through 12).
- 3) PDU Unit Order and Department Bulletin 19-152 requires the development of specific roll-call training on "fair and impartial policing" (see Attachments 1 and 2). Following this direction, roll call training was developed on a variety of topics that have specific language directed toward providing clarity and empowerment for supervisors.



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- a. In the roll call entitled "21<sup>st</sup> Century Policing" distributed on 03/25/20, supervisors are directed to "encourage continued dialogue" on 21<sup>st</sup> Century policing concepts and practices (see Attachment 4).
- b. Another roll call, entitled "Strategy 1.0" discusses fair and impartial policing concepts related to anti-bias principles such as safety, respect, justice, transparency, dignity, collaboration, guardianship, and human rights. To reinforce these concepts through the lens of a supervisor's responsibility to recognize these virtues and to act swiftly to correct improper behavior, the Roll Call asks: "Supervisory question: What can supervisors do to shine a spotlight on their officer's knowledge of the strategic plan?" The training goes on to discuss the supervisor's role in recognizing individual performance and reinforcing these concepts throughout the people in their charge. (see Attachment 4).
- c. In another Roll Call, entitled "Procedural Justice-Principle #4: Trust," supervisors are directly engaged to think deeply about their role in bringing this principle to life. It says, "Supervisory Responsibility: What leadership role does the supervisor have in ensuring that officers actions support procedural justice?" This same roll-call continues on with a key training component brought out by this recommendation--supervisors needing to "fully and adequately addressing bias incidents" (see CRI-TA Finding 28). It challenges supervisors by asking, "What type of intervention can be made to avoid potential citizen complaints of biased policing?" It then provides formal and informal methods of documentation and discipline as intervention tools (see Attachment 5).
- d. The Academy's latest roll-call trainings entitled "Educational Pathways and Training Links" includes "Leadership Track/Essential" courses, trainings, links, and articles that promote fair and impartial policing concepts that are achieved both through internal work (nobility, flow, emotional intelligence, lifelong learning) and external work (skill and tool enhancement through nest practices within and outside of policing) (see Attachment 7).

### **Compliance Measure 3: Evidence of scheduled, ongoing roll call training on fair and impartial policing.**

#### Steps Taken to Address CM3:

Examples of existing roll-call trainings from the past 2 years that have occurred on this subject matter that trains supervisors on roles and responsibilities, include (see Attachments 4 through 6):

- DGO 11.07 and DGO 5.17 (12/2020),
- 21<sup>st</sup> Century Policing (03/2020),
- Procedural Justice - Principle #4: Trust (09/2019)





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- *The Importance of Respectfully and Promptly Receiving Complaints Against Officers* (08/2019),
- *SFPD Strategic Plan 1.0* (10/2018), and
- *The Correct Use of Names & Pronouns with Transgender, Gender Variant and/or Nonbinary Officers...* (06/2019).

Specific and upcoming coursework that will support existing and planned roll-call trainings (see Attachments 7 through 10), including department-wide *Bias and Racial Profiling* training beginning in 2021 (see attachment 11) meet the intention and goals of this Compliance Measure.

### **Compliance Measure 4: Evidence of supportive and remedial action if deficiencies are found.**

#### Steps Taken to Address CM4:

- 1) Pursuant to the Unit Order (See Attachment 1), there is a collaboration between the Academy's Professional Development Unit and Staff Inspection Unit. Compliance deficiencies related to the ongoing roll-call training for department supervisors is communicated to the Internal Affairs Division for administrative investigation. Feedback from the Department's internal auditors at the Staff Inspection Unit and minutes/trends from the Department's Disciplinary Review Board will be incorporated into future roll-call trainings and infused into supervisor classes to consistently reinforce the principles.
- 2) Feedback on deficiencies as well as recommendations for roll-call training improvements is consistently and regularly shared between the Professional Development Unit and Station Training Coordinator Sergeants, who are the on-site liaisons to front-line patrol, administrative, investigative, and support staff that are all required to take roll-call trainings. The Academy did a 100-minute webinar on 10/01/2020 with the Station Training Coordinator Sergeants to enhance the channels of feedback and communication between them and the PDU's sworn and professional staff and to reaffirm their roles as training developers, teachers, auditors, and as mentors. They were invited by Department mail, a detailed agenda and notes were provided, and the webinar was recorded and distributed for future reference (See Attachment 13).
- 3) If deficiencies are found in specific officer performance as a result of internal complaints, external complaints, supervisory reviews and Staff Inspection Unit (auditing) reviews despite comprehensive policy and training work, remedies for offending members and supervisors who fail to



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intervene are clearly and unequivocally mandated in the newest revision of Department General Order 11.07 (see Attachment 12).