

Compliance Measures for Bias 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 3 - Bias					
Finding #	24	The SFPD did not conduct a comprehensive audit of official electronic communications, including department-issued e-mails, communications on mobile data terminals, and text messages on department-issued phones following the texting incidents.	Compliance Measures		Status
Rec #	24.1	The SFPD should immediately implement the bias audit as recommended by the U.S. Department of Justice COPS Office on May 5, 2016 (see appendix K).	1	Immediate implementation of bias audit of department-issued emails.	
			2	Immediate implementation of bias audit of department communications on mobile data terminals.	
			3	Immediate implementation of bias audit of text messages on department-issued phones.	
			4	Audit occurred.	
Rec #	24.2	Upon completion of recommendation 24.1, the outcome should be presented to the Police Commission.	1	Complete bias audit.	
			2	Present findings to Police Commission.	

Rec #	24.3	The SFPD should immediately establish a policy and practice for ongoing audit of electronic communication devices to determine whether they are being used to communicate bias.	1	Immediate establishment of policy for audits of electronic communication devices.	
			2	Established practice for ongoing audits of electronic communication devices including audit plan and process.	
			3	Evidence of audit of potential bias.	
			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	24.4	The SFPD should implement a policy and a Department General Order stipulating that there is no right to privacy in any use of department-owned equipment or facilities.	1	Issue or revise and Department General Order regarding privacy rights that states there is no privacy in use of department owned equipment, systems, or facilities.	
Rec #	24.5	The SFPD should require all members to acknowledge appropriate use standards for electronic communications. This should be a signed acknowledgement, retained in the personnel file of the member, and department personnel should receive an alert reminding them of appropriate use whenever they sign onto SFPD systems.	1	Establish policy regarding appropriate use standards for electronic communications.	
			2	Require signature of all employees and retained in personnel file.	
			3	Evidence of ongoing review and audit.	
			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	24.6	The SFPD should report twice a year to the Police Commission on the outcome of these audits, including the number completed, the number and types of devices audited, the findings of the audit, and the personnel outcomes where biased language or other conduct violations are discovered.	1	Policy to report bias outcomes twice yearly to PC.	
			2	Audit report to include <ul style="list-style-type: none"> • Number of audits • Number and types of devices audited • Findings of audit • Personnel outcomes if/when violations are discovered. 	
			3	Evidence of ongoing review and audit	
			4	Evidence of supportive and remedial action if deficiencies are found	

Finding #	25	The SFPD's General Orders prohibiting biased policing, discrimination, harassment, and retaliation are outdated and do not reflect current practices surrounding these key areas.	Compliance Measures		Status
Rec #	25.1	The SFPD should immediately update Department General Order 5.17 – Policy Prohibiting Biased Policing (effective May 4, 2011) and Department General Order 11.07 – Discrimination and Harassment (effective May 6, 2009) to reflect its current initiatives and align with best practices .	1	Immediately update of DGO 5.17 - Prohibiting Biased Policing.	
			2	Immediately update of DGO 11.07 – Discrimination and Harassment.	
			3	Aligned with best practices.	
			4	Update reflected in current department initiatives.	
			5	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	25.2	Upon meeting recommendation 25.1, SFPD leadership should release a roll-call video explaining the Department General Orders and reinforcing that a bias-free department is a priority.	1	Upon completion of Recommendation 25.1, create and release a roll-call video that clearly explains the updated DGO 5.17 - Prohibiting Biased Policing. Video must include messaging that having a bias-free department is a priority.	
			2	Create and release roll-call video that clearly explains the updated DGO 11.07 - Discrimination and Harassment. Video must include messaging that having a bias-free department is a priority.	
Rec #	25.3	The SFPD should develop and publish a comprehensive strategy to address bias. The strategy should create a framework for the SFPD to <ul style="list-style-type: none"> • be informed by the preliminary action planning that was initiated during the command-level training in Fair and Impartial Policing, which addressed policy, recruitment, and hiring; training; leadership, supervision, and accountability; operations; measurement; and outreach to diverse communities; • update policies prohibiting biased policing to include specific discipline outcomes for failure to follow policy; • continue to expand recruitment and hiring from diverse communities 	1	Develop, in consultation with the relevant stakeholders, a comprehensive strategy to address bias.	
			2	Evidence that strategy created framework for SFPD to <ul style="list-style-type: none"> • be informed by the preliminary action planning which addressed policy, recruitment, and hiring; training; leadership, supervision, and accountability; operations; measurement; and outreach to diverse 	

		(see recommendation 84.2); <ul style="list-style-type: none"> • partner with the communities and stakeholders in San Francisco on anti-bias outreach (see recommendation 26.1); • improve data collection and analysis to facilitate greater knowledge and transparency around policing practices in the SFPD; • expand its focus on initiatives relating to anti-bias and fully implement existing programs as part of the overall bias strategy, including the existing Not on My Watch program aimed at engaging officers and the community on addressing issues of bias. 		communities; <ul style="list-style-type: none"> • update policies prohibiting biased policing to include specific discipline outcomes for failure to follow policy; • continue to expand recruitment and hiring from diverse communities (see recommendation 84.2); • partner with the communities and stakeholders in San Francisco on anti-bias outreach (see recommendation 26.1); • improve data collection and analysis to facilitate greater knowledge and transparency around policing practices in the SFPD; • expand its focus on initiatives relating to anti-bias and fully implement existing programs as part of the overall bias strategy, including the existing Not on My Watch program aimed at engaging officers and the community on addressing issues of bias. 	
			3	Strategy was published internally and externally.	
Rec #	25.4	As part of its overall strategy, the SFPD should assess its needs for anti-bias programs across the organization, such as gender bias in sexual assault investigations.	1	Completed assessment of needs for anti-bias programs.	
			2	Identified strategy to address the need.	
			3	Training and policy implementation, as required through identified needs of the assessment.	
			4	Evidence of supportive and remedial action if deficiencies are found.	

Finding #	26	There is limited community input on the SFPD's actions regarding its anti-bias policies and practices.	Compliance Measures		Status
Rec #	26.1	The Chief's Advisory Forum should be re-invigorated and allow for diverse communities to have meaningful input into bias training, policies, and the SFPD's other anti-bias programming. The chief should ensure that marginalized communities are given a meaningful opportunity to be a part of the Advisory Forum.	1	Reinvigorate Chief's Advisory Forum.	
			2	Provide diverse communities with meaningful input on <ul style="list-style-type: none"> • bias training • policy • other anti-bias programs 	
			3	Ensure that a broad coalition of community members are identified so that marginalized communities have an opportunity for meaningful involvement.	
			4	Evidence of supportive and remedial action if participation goals not met.	
Rec #	26.2	The SFPD should more clearly describe its anti-bias policies and practices for reporting police misconduct and its commitment to ensuring that policing in San Francisco will be bias-free.	1	Clear communication of anti-bias policies and practices for reporting police misconduct.	
			2	Clear communication of commitment to anti-bias policing in San Francisco.	
			3	Evidence of sufficient dissemination of policies and practices directed at ensuring a bias-free policing commitment.	
Rec #	26.3	The SFPD should implement an immediate public education campaign on the policies and procedures for reporting misconduct as centered on anti-bias <u>and the initiatives underway.</u>	1	Immediate implementation of a public education campaign.	
			2	Publicize via multiple media the procedures for reporting bias misconduct.	
			3	Publicize via multiple media the SFPD's initiatives for bias-free policing.	
			4	Ongoing evaluation loop and audit.	

Rec #	26.4	The SFPD should work with the Police Commission to convene a community focus group to obtain input on the policies and practices as they are being developed.	1	Partner with Police Commission to convene community focus group(s).	
			2	Obtain input on policies and practices during policy development.	
			3	Establish ongoing evaluation and audit loop that input from community is considered.	
Finding #	27	The SFPD is not addressing the anti-bias goals set forth through the Fair and Impartial Policing training-the-trainers session.	Compliance Measures		Status
Rec #	27.1	The SFPD should develop a training plan based on a training needs assessment specific to the delivery of anti-bias training as part of an ongoing strategic approach to addressing bias in the SFPD.	1	Conduct needs assessment for delivery of anti-bias training.	
			2	Plan ongoing strategic approach to addressing bias.	
			3	Develop and implement a bias training plan based on the needs assessment.	
			4	Establish process for evaluation or audit.	
Rec #	27.2	<p>The SFPD should begin anti-bias and cultural competency training of department members immediately and should not await the outcome of the training needs assessment. All officers should complete implicit bias training and cultural competency training, which should include the following topics:</p> <ul style="list-style-type: none"> • Implicit bias awareness and skills for promoting bias-free policing • The definition of cultural competence • Disparate treatment, prejudice, and related terms and their application in law enforcement • The history of various cultures and underrepresented groups in society • Self-assessment of cultural competency and strategies for enhancing one's proficiency in this area • Culturally proficient leadership and law enforcement in communities. 	1	<p>Immediately began anti-bias and cultural competency training that includes Implicit bias awareness and skills for promoting bias-free policing including the following topics:</p> <ul style="list-style-type: none"> • The definition of cultural competence • Disparate treatment, prejudice, and related terms and their application in law enforcement • The history of various cultures and underrepresented groups in society • Self-assessment of cultural competency and strategies for enhancing one's proficiency in this area • Culturally proficient leadership and law enforcement in communities. 	

			2	Policy that requires all officers to complete implicit bias and cultural competency training.	
			3	Evidence of training review and effectiveness.	
			4	Evidence of supportive and remedial action if deficiencies are found – including failure to attend training.	
Rec #	27.3	Training addressing explicit and implicit biases should employ teaching methodologies that implement interactive adult learning concepts rather than straight lecture-based training delivery.	1	Develop training with expert input on addressing explicit and implicit biases that uses adult teaching methodologies.	
			2	Training uses interactive adult learning concepts.	
			3	Training delivery not solely lecture based.	
			4	Continuous improvement loop.	
Rec #	27.4	To ensure first-line supervisors understand the key role they play in addressing bias, supervisor training should include coaching, mentoring, and direct engagement with problem officers.	1	Conduct training for first-line supervisors.	
			2	Focus on ensuring they understand their role in addressing bias.	
			3	Training covers: <ul style="list-style-type: none"> • coaching • mentoring • direct engagement with problem officers 	
			4	Evidence of review loop.	
Rec #	27.5	All officers and supervisors should be fully trained on bias and cultural competency within 18 months of the release of this report.	1	Training compliance for all officers within 18 months.	
			2	Training compliance for all supervisors within 18 months.	

			3	Audit to ensure that training was completed within 18 months – by 4/12/18.	
			4	Evidence of supportive and remedial action if deficiencies are found – including failure to attend training.	
Rec #	27.6	The SFPD should measure the efficacy of such training through careful data collection and analysis practices, ideally in partnership with an academic researcher.	1	Partner with an academic researcher	
			2	Evidence of continued good data collection and analysis practices.	
			3	Evaluate success of bias training.	
Rec #	27.7	The SFPD should implement Force Options Training in a manner that reduces the impact of demographics on split-second use of force decisions and should ensure that in-service officers receive this training at least annually.	1	Develop training curriculum designed to reduce the impact of demographics on split-second use of force decisions.	
			2	Implement force options training.	
			3	Provide annual training to all officers.	
			4	Evidence of training review.	
			5	Ongoing assessment of impact on the relationship between use of force and demographics.	
			6	Evidence of supportive and remedial action if deficiencies are found – including failure to attend training.	
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.	Compliance Measure		Status
Rec #	28.1	The SFPD should investigate complaints of bias transparently and openly and recognize its potential impact upon the larger group of officers who do not hold such views and upon the affected communities of San Francisco. To address these concerns, the department should	1	Establish and publicize transparent process for investigation of bias complaints.	
			2	Train and institutionalize policies and practices that recognize impact of bias on other officers.	

		<ul style="list-style-type: none"> • identify specific roles and responsibilities for supervision of officers regarding biased behavior; • analyze E-585 traffic stop incident report data and enforcement actions with a lens for possible bias or disparate treatment and require supervisors to review these analyses; • identify intervention mechanisms beyond discipline to deal with potentially biased behaviors. 	3	Train and institutionalize policies and practices that recognize impact of bias on the affected communities.	
			4	Identify specific roles and responsibilities for supervision of officers regarding biased behavior.	
			5	Require supervisors to analyze stop data and enforcement actions for possible bias behavior or disparate treatment.	
			6	Identify corrective intervention beyond discipline to address possible bias behaviors.	
			7	Evidence of continual review/improvement loop.	
Rec #	28.2	The SFPD should provide for open, ongoing command engagement around the issue of bias, both internal and external to the department.	1	Provide command awareness and sufficient knowledge regarding bias in policing and the community perspective.	
			2	Task command staff with engaging internally on the issue of bias.	
			3	Task command staff with engaging externally on the issue of bias.	
			4	Evidence of supportive and remedial action if deficiencies are found based upon the communications.	
Rec #	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.	1	Develop scheduled, on-going roll-call training requirements for supervisors.	
			2	Ensure the training addresses key leadership issues and the role of supervisors in promoting fair and impartial policing.	
			3	Evidence of scheduled, ongoing roll call training on fair and impartial policing.	

			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	28.4	The SFPD needs to engage in early identification of and intervention in behaviors that are indicative of bias through direct supervision, data review, and observation of officer activity.	1	Policy and process to enable early identification of and intervention in bias-based behaviors.	
			2	Identify indicators of bias to allow intervention.	
			3	Routine review of data to measure potential bias-based-behavior.	
			4	Evidence of interventions when bias-based behavior is identified.	
			5	Ongoing evaluation loop and audit.	
Rec #	28.5	The SFPD needs to train supervisors to recognize behaviors that are indicative of bias and intervene effectively.	1	Train supervisors on recognizing bias behaviors.	
			2	Establish intervention protocols for indicating bias-based behaviors to support supervisory intervention.	
			3	Evidence of supportive and remedial action if deficiencies are found.	
			4	Ongoing evaluation loop and audit.	
Rec #	28.6	The SFPD must address practices within the organization that reflect explicit biases and intervene with firm, timely disciplinary responses.	1	Policy that identifies prohibited bias-based behaviors and how they will be addressed.	
			2	Evidence of timely supportive and remedial action if deficiencies are found.	
			3	Evidence of disciplinary outcomes for violation of anti-bias policies.	

			4	Ongoing evaluation loop and audit.	
Rec #	28.7	The SFPD needs to encourage all personnel to report biased behavior to the appropriate officials.	1	Policy that requires officers to report bias-based behavior.	
			2	Ongoing education as to the requirement to report and why it is valuable to the SFPD as a whole.	
			3	Ongoing evaluation loop and audit.	
Finding #	29	Allegations of biased policing by community members have not been sustained against an officer in more than three years.	Compliance Measures		Status
Rec #	29.1	The SFPD and OCC should establish shared protocols for investigating bias that do not rely solely on witness statements, given that bias incidents are often reported as one-on-one occurrences.	1	SFPD and DPA establish shared protocols for investigating bias.	
			2	Protocols avoid sole reliance on witness statements.	
			3	Evidence of investigation of one-on-one complaints.	
Rec #	29.2	The SFPD should ensure that supervisors are trained on bias investigations, including all of the following: <ul style="list-style-type: none"> • How to identify biased police practices when reviewing investigatory stop, arrest, and use of force data • How to respond to a complaint of biased police practices, including conducting a preliminary investigation of the complaint in order to preserve key evidence and potential witnesses • How to evaluate complaints of improper pedestrian stops for potential biased police practices. 	1	Develop training that is informed by best practices and includes: <ul style="list-style-type: none"> • How to identify bias when reviewing investigatory stop, arrest, and use of force data. • How to respond to a complaint of bias practices. • How to conduct a preliminary investigation to preserve key evidence and witnesses. • How to evaluate complaints of improper pedestrian stops for bias practices. 	
			2	Train all supervisors on bias investigations.	

			3	Establish evaluation or audit loop to assess efficacy of training.	
Rec #	29.3	The SFPD should work with the City and County of San Francisco to ensure quality bias investigation training to all oversight investigators.	1	SFPD should collaborate with City and County of San Francisco.	
			2	Develop and/or ensure delivery of quality bias investigation training.	
			3	Engage in training with all oversight investigators.	
Rec #	29.4	SFPD leadership should explore the options for alternate dispute resolutions regarding bias complaints, including mediation.	1	Evidence of review of alternate dispute resolutions for bias complaints.	
			2	Evidence of the decision and any actions that resulted.	
Finding #	30	The weight of the evidence indicates that African-American drivers were disproportionately stopped compared to their representation in the driving population.	Compliance Measures		Status
Rec #	30.1	The SFPD should develop a plan to conduct further review and analysis of traffic stop data to identify the reasons and potential solutions for the traffic stop data disparities. The plan should be developed within 180 days of the issuance of this report.	1	Evidence of a plan to review and analyze traffic stop data.	
			2	Review and analyses seek to identify reasons for disparities.	
			3	Review and analysis seek to identify solutions for stop disparities.	
			4	Plan developed by April 12, 2017.	
Rec #	30.2	Upon completion of recommendation 30.1, the SFPD should implement the plan to review and analyze traffic stop data to identify the reasons and potential solutions for the traffic stop data disparities.	1	Implement the plan from Recommendation 30.1.	
			2	Implement plan to review and analyze data.	
			3	Identify reasons for disparities.	
			4	Identify and implement potential solutions.	
			5	Establish evaluation or audit loop to evaluate efficacy of plan.	
Rec #	30.3	The SFPD should provide supervisors with the results of timely data analyses regarding the E-585 traffic stop incident report activity of their	1	Provide timely traffic stop data analysis to supervisors.	

		officers that allow them to identify and proactively intervene when outlier officers are identified.	2	Data analysis includes all officers under their supervision.	
			3	Data identifies outlier officers.	
			4	Evidence of proactive supervisory intervention with outlier officers.	
			5	Evidence of supportive and remedial actions if deficiencies are found.	
			6	Evidence of ongoing review of stop data at supervisory level.	
Rec #	30.4	Until the data are electronic, supervisors should be provided with monthly paper reports regarding the E-585 traffic stop incident report activity of officers under their command.	1	Provide monthly paper traffic stop reports to supervisors.	
			2	Report includes data for officers under their supervision.	
			3	Evidence paper reports are provided until data reports are available electronically.	
			4	Evidence of audit or review loop.	
Rec #	30.5	SFPD supervisors must be trained (pursuant to recommendation 27.1) to review and assess E-585 traffic stop incident report data for disparate outcomes, particularly in relation to peer groups within the unit.	1	Develop training and train supervisors to review stop data for potential bias and disparate outcomes	
			2	Train supervisors how to recognize disparate outcomes in relation to unit peers.	
			3	Review/improvement loop of training.	
			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec#	30.6	The SFPD should implement the data collection recommendations regarding improving traffic stop data provided in Appendix F. The timing of the implementation needs to be identified in the technology plan.	1	Establish a data collection plan consistent with Appendix F of original report and timeline for implementation.	
			2	Create or update relevant policies regarding the collection of data by officers based on best practices.	

			3	Evidence of review of the requirements to support this recommendation.	
			4	Evidence of supportive and remedial action if deficiencies are found.	
Finding #	31	African-American and Hispanic drivers were disproportionately searched and arrested compared to White drivers. In addition, African-American drivers were more likely to be warned and less likely to be ticketed than White drivers.	Compliance Measures		Status
Rec #	31.1	The SFPD needs to analyze the data and look for trends and patterns over time to reduce the racial and ethnic disparities in post-stop outcomes.	1	Evidence of analysis of traffic stop data for trends/patterns over time.	
			2	Identification of racial and ethnic disparities in post-stop outcomes.	
			3	Plan to reduce disparities in post-stop outcomes.	
			4	Establish evaluation or audit loop.	
Finding #	32	Not only are African-American and Hispanic drivers disproportionately searched following traffic stops but they are also less likely to be found with contraband than White drivers.	Compliance Measures		Status
Rec #	32.1	As stated in finding 31, the SFPD should complete recommendation 31.1.	1	Complete recommendation 31.1.	
Rec #	32.2	The SFPD needs better training on the Fourth Amendment and applicable state laws on search and seizure.	1	Improve curriculum for 4 th Amendment training.	
			2	Evidence of revised/improved training on state search and seizure laws.	
			3	Continuous improvement loop regarding efficacy of training.	
Finding #	33	The current E-585 traffic stop incident report does not collect sufficient or appropriate information to allow for a robust analysis of possible bias by SFPD officers.	Compliance Measures		Status

Rec #	33.1	The SFPD should implement the data collection recommendations in appendix F to allow for better information and analysis of stop data.	1	Develop a data collection plan consistent with recommendations in Appendix F.	
			2	Ensure ongoing review and analysis of data to ensure sufficiency and accuracy of data collected.	
			3	Train officers and supervisors on data collection responsibilities, including how to collect and accurately report data.	
			4	Evidence of ongoing review/continual improvement loop.	
			5	Evidence of supportive and remedial action if deficiencies are found.	
Finding #	34	The SFPD does not routinely collect or analyze data on stops involving pedestrian and non-motorized conveyances.	Compliance Measures		Status
Rec #	34.1	The SFPD should prioritize the collection, analysis, and reporting of all nonconsensual stop data, including pedestrian and non-motorized conveyances.	1	Establish a data collection plan to prioritize data collection for all reportable stops in keeping with AB 953 requirements.	
			2	Train officers and supervisors on data collection responsibilities.	
			3	Evidence of ongoing review/continual improvement loop.	
			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	34.2	The SFPD should mandate the collection of stop report data on any stop or detention of a pedestrian or person riding a non-motorized conveyance, such as a bicycle, skateboard, or scooter. This should begin immediately and not wait until AB 953 requires such action in April 2019.	1	Establish or update policy to mandate the collection of stop data for non-motorized conveyances.	
			2	Evidence of ongoing review and analysis of data to ensure sufficiency and accuracy of data collected.	
			3	Evidence of ongoing review/continual improvement loop.	

			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	34.3	The SFPD should consider expanding the functionality of the E-585 traffic stop incident report data collection system to include data collection for all pedestrian and non-motorized conveyances.	1	Complete the data collection plans for pedestrian and non-motorized conveyances.	
			2	Review use of E-585 to facilitate the collection and document the decisions.	
			3	If used, ensure ongoing review and analysis of data to ensure sufficiency and accuracy of data collected.	
Finding #	35	The SFPD does not have sufficient systems, tools, or resources needed to integrate and develop the appropriate data required to support a modern, professional police department.	Compliance Measures		Status
Rec #	35.1	The SFPD should adopt new policies and procedures for collecting traffic and pedestrian stop data, public complaints, and enforcement actions. Information for these events should be recorded accurately.	1	Establish policy for collecting accurate traffic and pedestrian stop data.	
			2	Establish policy and procedure that is informed by best practices for collecting public complaints data.	
			3	Establish policy and procedure that is informed by best practices for collecting data on enforcement actions.	
			4	Evidence of continual audit/review/improvement loop.	
			5	Evidence of remedial action if deficiencies are found.	
Rec #	35.2	The SFPD should analyze its existing technology capacity and develop a strategic plan for how data are identified, collected, and used to	1	Evidence of review of technology capacity.	

		advance sound management practices.	2	Develop strategic plan that details how stop data is <ul style="list-style-type: none"> • identified • collected 	
			3	Establish and implement plan to advance sound management practices.	
Rec #	35.3	SFPD leadership should make a concerted effort to focus on data collection and to create systems and analysis protocols that will inform supervisors where incidents of potential bias or disparate treatment occur or where patterns in officer behavior exist that warrant further examination or monitoring.	1	Evidence supporting leadership focus on data collection.	
			2	Creation of systems and analysis protocols that inform supervisors where potential bias or disparate treatment occur.	
			3	Systems and analysis protocols that identify officer behavior patterns that require review.	
			4	Establish audit/review/improvement loop.	
			5	Evidence of supportive and remedial actions if deficiencies are found.	
Rec #	35.4	The SFPD should continue participating in the White House Data Initiative and seek to expand its data collection and reporting consistent with those recommendations and the goals of the initiative.	1	Confirm continued participation in the White House Data Initiative (now known as the Police Data Initiative).	
			2	Identify a data reporting strategy and timeline, including expanded data collection and reporting.	
			3	Ensure ongoing review and analysis of data to ensure sufficiency and accuracy of data collected.	
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.	Compliance Measures		Status

Rec #	36.1	The SFPD should develop an audit practice to evaluate the impact on the department of the implementation of new training programs.	1	Develop audit practice to evaluate impact of new training initiatives.	
			2	Conduct audit of new training programs.	
			3	Identify training gaps or strengths.	
			4	Remedial action if deficiencies are found.	
Rec #	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.	1	Review/audit anti-bias programs.	
			2	Review on an ongoing basis.	
			3	Results incorporated into quarterly report.	
			4	Report includes promising practices, lessons learned, and plans for change based upon findings.	
Rec #	36.3	The SFPD should review all of its policies, procedures, manuals, training curricula, forms, and other materials to eliminate the use of archaic or biased language. For example, the SFPD should review the use of the word "citizen" in policies and forms, such as the Citizen Complaint Form (SFPD/OCC 293). This assessment should be completed within 120 days of the issuance of this report.	1	Develop a plan for review of all SFPD documents to identify and remove archaic and biased language. This should include the specific terms to be removed.	
			2	Develop the timeline and action plan.	
			3	Conduct assessment/review all policies and supporting documents for the use of biased language.	
			4	Confirm removal of language has occurred.	
Finding #	37	The policy for the use of Field Interview cards fails to outline sufficient guidance on when they should be completed.	Compliance Measures		Status

Rec #	37.1	The SFPD should establish policy that specifically governs when and how Field Interview cards are completed. This should be accomplished within 180 days of the issuance of this report.	1	Develop and establish a Field Interview Card policy that provides sufficient guidance on when and how SFPD members should complete them.	
			2	Develop and provide training on new policy.	
			3	Evidence of ongoing review/continual improvement loop.	
			4	Evidence of supportive and remedial action if deficiencies are found.	
Rec #	37.2	The SFPD needs to reassess its use, storage, and collection of Field Interview cards to ensure data retention and collection are in accord with legal requirements. Annual audit of Field Interview cards should be part of the data retention practices.	1	Conduct an assessment of use, storage and collection practices regarding Field Interview Cards.	
			2	Develop a policy addressing use, collection, and storage that addresses any key issues identified in the assessment and that comports with legal requirements.	
			3	Implement compliant use, collection and storage practices.	
			4	Evidence of ongoing review/continual improvement loop.	
			5	Evidence of supportive and remedial action if deficiencies are found.	