

<b>Finding # 27</b>	<b>The SFPD is not addressing the anti-bias goals set forth through the Fair and Impartial Policing training-the-trainers session.</b>
<b>Recommendation # 27.2</b>	<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"> <li>• Implicit bias awareness and skills for promoting bias-free policing</li> <li>• The definition of cultural competence</li> <li>• Disparate treatment, prejudice, and related terms and their application in law enforcement</li> <li>• The history of various cultures and underrepresented groups in society</li> <li>• Self-assessment of cultural competency and strategies for enhancing one’s proficiency in this area</li> <li>• Culturally proficient leadership and law enforcement in communities.</li> </ul>

<b>Recommendation Status</b>	<b>Complete</b>	<b>Partially Complete</b>	<b>In Progress</b>
	<b>Not Started</b>	<b>No Assessment</b>	

**Summary**

The San Francisco Police Department has instituted anti-bias education and cultural competency training, which are supported by department policy and California POST mandates and delivered across multiple platforms, including roll call, traditional lecture, and scenario based training.

The department’s decision regarding the automatic release of book photos is an example of culturally proficient leadership. Training is reviewed and audited for effectiveness by an evaluations officer assigned to the training division who also acts as a liaison to DHR. Remedial action for failure to attend training is shown through officers subject to discipline under General Order 2.01.

<b>Compliance Measures</b>		<b>Status/Measure Met</b>
<b>1</b>	<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"> <li>• The definition of cultural competence –</li> <li>• Disparate treatment, prejudice, and related terms and their application in law enforcement</li> <li>• The history of various cultures and underrepresented groups in society</li> <li>• Self-assessment of cultural competency and strategies for enhancing one's proficiency in this area</li> <li>• Culturally proficient leadership and law enforcement in communities.</li> </ul>	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>2</b>	Policy that requires all officers to complete implicit bias and cultural competency training.	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>3</b>	Evidence of training review and effectiveness.	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>4</b>	Evidence of supportive and remedial action if deficiencies are found – including failure to attend training.	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>

**Administrative Issues**

**Compliance Issues**



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**Finding # 27:** The SFPD is not addressing the anti-bias goals set forth through the Fair and Impartial Policing training-the-trainers session.

**Recommendation # 27.2** 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 on the following topics:

- 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

**Response Date: January 14, 2020**

### **Executive Summary:**

Since this Department of Justice (DOJ) recommendation was received in 2016, the San Francisco Police Department (SFPD) has continuously evolved to create new course curriculum to strive to eliminate bias within the Department and improve "cultural competency".

Cultural competency has been at the forefront of conversation through the years. Cultural competency allows for the SFPD to focus on policies to adopt inclusion as part of their day-to-day interactions with the community, and internally.

The SFPD focused on working with the original definition of "cultural competency" developed in 1998 by Dr. Tracy L. Cross. Dr. Cross is an education psychologist who collaborated with multiple academics and was sourced by The National Center for Cultural Competence at Georgetown University.

### **National Center for Cultural Competence, 1998, modified from Cross et al:**

*"Cultural competence requires that organizations:*

- *Have a defined set of values and principles, and demonstrate behaviors, attitudes, policies, and structures that enable them to work effectively cross-culturally.*
- *Have the capacity to (1) value diversity, (2) conduct self-assessment, (3) manage the dynamics of difference, (4) acquire and institutionalize cultural knowledge, and (5) adapt to diversity and the cultural contexts of communities they serve.*



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- Incorporate the above in all aspects of policymaking, administration, practice and service delivery, systematically involve consumers, families and communities.
- Cultural competence is a developmental process that evolves over an extended period. Both individuals and organizations are at various levels of awareness, knowledge and skills along the cultural competence continuum."

Upon entering the Academy, recruit officers receives over 73 hours of multicultural training, such as cultural immersion, LGBTQ immersion, racial profiling, interacting with gender diverse people, and ADA education. Bi-annual training occurs for all officers for recertification by POST through the Advanced Officer and Continued Professional Training (AO/CPT), which includes principled policing and procedural justice training. Additional courses include a partnership with the Department of Human Resources (DHR) to provide bias related training.

The SFPD has also consulted academics, including the Stanford Center for Social Psychological Answers to Real-World Questions (SPARQ). Stanford Academics provided us with the most recent ideology of "Cultural Humility":

*"People have largely gone away from cultural "competency" and toward cultural "humility." The problem is that competency training assumes you could know about the tens of relevant cultures and know how to behave if you encountered, say, an El Salvadoran or a Nigerian or an Iraqi and the training involves giving people lists of things - like "don't talk to the woman" or "don't look the man in the eyes." Typically, they provide no awareness of situational context or why you are interacting with the person and don't deal with the larger social dynamics.*

*Of interest to a law enforcement audience, the idea of cultural humility shares some features with procedural justice in that it assumes that the best thing to do is to ask questions and try to figure out what is going on and that you probably don't understand any given situation without a lot more info. So you should maintain a perspective that is other-oriented and questioning when you encounter racial, ethnic, language, religious, gender, sexual orientation difference.*

*The cultural humility training programs that exist have been developed for medical people and some for teachers.*

*In education, that term itself is heavily critiqued – people are more likely to talk about multicultural education or the idea of cultural humility; there is also a related line of work on culturally responsive or sustaining pedagogy and educating for 'global citizens'."*

The SFPD has fully engaged in the reform process and the department is committed to ensuring that principled policing and the reduction of bias are woven into the department's culture.



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### Prescreen Meeting:

On 12/28/2020, the SFPD participated in a prescreen meeting with Cal DOJ and Hillard Heintze for this recommendation. The following feedback was provided after that meeting from Cal DOJ, and has been incorporated into this recommendation under the various listed compliance measures:

“Cal DOJ and Hillard Heintze generally thought that this package looked good. For the Form 2001 narrative for Compliance Measure 1, Cal DOJ thought that SFPD could also include additional positive feedback from Dr. Hetey’s evaluation so it’s more readily accessible to any member of the public that is looking at this recommendation package. Specifically, Dr. Hetey stated:

*“In stark contrast, at SFPD I observed a genuine embrace of the material and saw evidence of the core team’s work to tailor the material to the agency in order to demonstrate why it matters for all members of the SFPD. Of any agency I have observed, SFPD put the most thought and effort into making the material its own. The core instructors added real-life examples and expanded the scope to make the course even more relevant and useful to its members, while staying true to the mission of the course and the science that undergirds it.”*

This language could be included in the Form 2001.

Hillard Heintze also asked whether SFPD has considered making an evaluation by Dr. Hetey part of any ongoing external review of the Department’s bias trainings. SFPD noted that it has considered an ongoing external review, and the Chief has approved some language related to this review. The external review proposal is now with the City Attorney to approve. Hillard Heintze asked SFPD to include that information in the package because it shows the public that SFPD is not only conducting an ongoing internal review, but an external one as well.

For Compliance Measure 3, Cal DOJ had a few points of feedback. First, the language under this Compliance Measure starts with: “For all new training programs, the above evaluation and follow up impact evaluation audit and evaluation system are in place. This consists of reviewing student evaluations completed directly after the course, as well as follow up training impact evaluations received 4 months later.” The Form 2001 does not reference any evaluation and follow up impact evaluation audit earlier in Compliance Measures 1 or 2 so Cal DOJ asked that SFPD revise this language. Second, the narrative under Compliance Measure 3 states: “The Professional Development Unit has an officer assigned who oversees reviewing and implementing all bias related training and subjects. This officer reviews new training programs regarding bias provided to members of the San Francisco Police Department.” Cal DOJ asked that SFPD provide some documentation supporting this statement (such as a policy requiring this assignment). Third, the narrative under Compliance Measure 3 repeats language in Compliance Measure 1 about working with experts in the field of implicit bias and the evaluation by Dr. Hetey. Rather than repeat that information in Compliance Measure 3, SFPD can just reference the language in



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Compliance Measure 1 (that is, state that SFPD also worked with experts in implicit bias, as described in more detail in Compliance Measure 1).

For Compliance Measure 4, SFPD states that bias-related training is mandatory for all members, but Cal DOJ noted that SFPD does not include any information (such as an audit) about actual attendance with this training requirement. SFPD explained that it does conduct training audits that are usually around 98%, but there will never be 100% compliance for a variety of reasons, including that some members might be on leave when the bias training is offered. Cal DOJ asked that SFPD include information and documentation about the training audit, the attendance rates, and explain why there isn't full compliance (such as, members may have been on leave). To the extent someone is simply non-compliant, SFPD can explain the remedial action (e.g., they are signed up for the next available training).

Hillard Heintze also noted that the package included several older department bulletins (that are over 2 years old), which SFPD explained were included to show the progression of their bias training and policies related to bias issues. Hillard Heintze broadly advised that SFPD should look into these older department bulletins and develop a plan to incorporate these into new or existing department general orders, consistent with DGO 3.01."

As requested, the above feedback was addressed in Compliance Measures 1, 3 and 4, and is included throughout this recommendation.

### Compliance Measures:

- 1) **Immediately begin anti-bias and cultural competency training that includes implicit bias awareness and skills for promoting bias-free policing including the following topics:**
  - **The definition of cultural competence**
  - **Disparate treatment, prejudice, and related terms and their application to 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**

Uniform and non-uniform employees are currently within training compliance. All training was completed by December 2018 and is ongoing for all members through AO/CPT and for all incoming academy recruits. Currently the department is at 98% compliance. Further discussion of this is included in Compliance Measure #4 (See Attachment #1: [Bias Training Audit Report](#))

Immediately upon receiving the suggestions for reform from the DOJ, the SFPD began to expand curriculum to combine procedural justice concepts with the work of Dr. Jennifer Eberhardt (Stanford University), Dr. Laura Fridell (University of South Florida),



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Dr. Josh Correll (University of Colorado, Boulder), and Dr. Jack Glaser (UC Berkeley) including the following social science concepts:

- Implicit and Explicit Biases
- Bias by Proxy
- Bias Confirmation
- Threat/No Threat exercises
- Media Response
- Societal Challenges based on Prison population
- Visual Perceptions
- Blink Responses
- Black Crime Association Bias

The San Francisco Police Academy compiled a P.O.S.T. certified training program for Principled Policing and Implicit/Explicit Bias, which is provided to all new members and during AO/CPT. All members of the San Francisco Police Department are in compliance with this training.

Procedural Justice Training consists of five modules

- Module 1: The Interactive Nature between Procedural Justice, Legitimacy and Goals in Policing
- Module 2: Expectations and Legitimacy
- Module 3: Education and Training
- Module 4: Historical and Generational Effects of Policing
- Module 5: Implicit Bias and Stereotypes

The SFPD has partnered with the Department of Human Resources (DHR) to provide the following Bias related training:

- Creating an Inclusive Environment (2-Day Training)
- Managing Implicit Bias: Raising Awareness and Creating Inclusion (1-Day Training)

The SFPD Training Division has created a list of courses that make up the departments Bias training curriculum. (See Attachment #2: SFPD Bias Related Training.)

Recruit Academy Classes (required per 13519.4 PC)

- Principled Policing (ongoing for all new employees)
- Procedural Justice and Implicit Bias (8-hour course, including a 3-hour block of Implicit Bias and Black Crime Association)
- Cultural Diversity Training (part of SFPD Basic Academy Training)
- Biased Based Policing (2-hour course). Museum of Tolerance Certified Instructors



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- Racial Profiling (4-hour course). Museum of Tolerance Certified Instructors

### AO/CPT-Mandatory Classes

- Critical Mindset and Coordinated Response (CMCR) – 8 hours
- Force Options - 4 hours
- Arrest and Control - 4 hours
- Communication: Keeping your Edge (Post Learning Portal) - 2 hours
- BSU/Officer Wellness - 2 hours
- Crisis Intervention Training (CIT) - 40 hours - over 50% Department-wide (60% Patrol). 2-hour component on bias within this course
- CIT Team Concepts (Field Tactics and Use of Force DGO 5.01) - 20 hours. Bias related training is infused throughout the course (meaning that there is no specified block of hours, but it is present within)

Roll Call Trainings (RC) presented by the department to members that touch upon Bias and inclusion: (See Attachment #3: Bias Related Roll-Call Trainings)

- RC 2017-001, Autism Awareness for Law Enforcement
- RC 2017-002, Procedural Justice – Principle #1: Voice
- RC 2017-002, Procedural Justice – Principle #2: Neutrality
- RC 2018-001, Sanctuary City Policy
- RC 2018-003, SFPD Strategic Plan
- RC 2019-003, Lessons 1 & 2; Correct use of names and pronouns & search procedures for Transgender, Gender Variant, and Non-Binary individuals and search procedures.
- RC 2019-004, Procedural Justice — Principle #3: Respect
- RC 2019-006, Procedural Justice – Principle #4: Trust
- RC 2020-004, 21st Century Policing

The bias specific training that members receive from the SFPD and DHR provide a guiding principle for members to carry out all their duties in a manner free from bias. This guiding principle, as discussed in the newly adopted Department General Order (DGO) 5.17; Bias Free Policing Policy, is aligned with SFPD's goal of eliminating implicit bias in all areas (See Attachment #4: DGO 5.17; Bias Free Policing).

The SFPD makes every effort to understand how law enforcement contributes, both negatively and without intention to stereotypes. This led to Chief Scott recently adopting a policy prohibiting the release of booking photos and contributing to idea of "confirmation bias" through the concept of "Illusory Correlation". An illusory correlation occurs when a person perceives a relationship between two variables that are not in fact correlated. The department, therefore, determined that releasing booking photos has the potential to contribute to the negative beliefs (stereotypes) of specific groups (See attachment #5; Department Notice #20-112; Department Media Relations and Social Media; Booking Photos and Arrestee Information).



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The SFPD has gone beyond just presenting material created by experts on the topic of bias, and has made a concerted effort to understand the science behind it. To gain a better understanding, the department has discussed ideas with experts such as Dr. Jennifer Eberhardt (Stanford University), Dr. Rebecca Hetey (Stanford University, Cal POST Instructor, RIPA Contributor) and Dr. Jack Glaser (UC Berkeley) on the science of mitigating negative bias impact.

As requested in the prescreen meeting from 1/28/20 with Cal DOJ and Hillard Heintze, for Compliance Measure 1, Cal DOJ thought that SFPD could also include additional positive feedback from Dr. Hetey's evaluation.

In 2017, Dr. Rebecca Hetey reviewed our training process and provided us with insight and guidance on answering tough questions about bias and cultural awareness. The SFPD continues to consider ongoing external review with academics and trainers in the field of bias, inclusion, diversity, and leadership. The implementation of such review relies on many factors, including budget and other financial constraints.

The following are excerpts from the supportive letter authored by DR. Hetey:

- "Since 2017, I have worked with members of the San Francisco Police Department (SFPD) as the agency adopted and has continuously refined its teaching of Principled Policing. I trained 3 of SFPD's members at various POST-sponsored Train the Trainer events and was invited by the agency to advise and teach a Train the Trainer that was held at SFPD's Academy. At that event, I met the agency's trainers, viewed their materials and observed them teaching, and engaged in various discussions about their pedagogical approaches and, most importantly, the agency's commitment to making the concept of Principled Policing a foundational part of the mission and values of the agency as a whole."
- "In stark contrast, at SFPD I observed a genuine embrace of the material and saw evidence of the core team's work to tailor the material to the agency in order to demonstrate why it matters for all members of the SFPD. Of any agency I have observed, SFPD put the most thought and effort into making the material its own. The core instructors added real-life examples and expanded the scope to make the course even more relevant and useful to its members, while staying true to the mission of the course and the science that undergirds it. This fidelity to the material was made all the more powerful by the fact that the trainers themselves reflected the diversity of the department and the City of San Francisco. Notably too, I observed how the course began with a beautifully filmed message from the Chief of Police describing why the agency is committed to Principled Policing and explaining the reasoning behind why all officers and civilian staff are required to complete the training."



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- “This fidelity to the material was made all the more powerful by the fact that the trainers themselves reflected the diversity of the department and the City of San Francisco. Notably too, I observed how the course began with a beautifully filmed message from the Chief of Police describing why the agency is committed to Principled Policing and explaining the reasoning behind why all officers and civilian staff are required to complete the training.”
- “SFPD Principled Policing teaching staff also expanded the concept of implicit bias to extend beyond race and ethnicity to also incorporate sexual orientation and bias based on other identity categories to better meet the needs of the population of San Francisco. I interpreted this extension of scope as genuine, and not as a way to “water down” the main message of the module as we at SPARQ designed it. This main message based the scientific evidence, is: implicit racial bias is real, acting on that implicit bias can give rise to racial disparities in law enforcement activity, and those disparities must be reduced in the name of equity, as well as to restore trust and strengthen the relationship with the community. In fact, SFPD’s teaching of the material goes more into depth on racial disparities in the criminal justice system than I have seen at any other agency.”

For full details, please review the attached report ([See Attachment #6: Written Evaluation by Dr. Rebecca Hetey](#)).

The DHR Team facilitates the Managing Implicit Bias course by use of pre-lecture engagement and facilitated discussions. During this course, the following topics are covered in a variety of formats:

- Online Training: Students respond to initial questions and prompts that help to center the “problem and needs” to be addressed in the training.
  - The neuroscience of bias is also explored and linked to the mandatory online module assigned as pre-work to the training.
- Training Module #1: participants actively share their own personal stories around bias, and the impacts that those experiences have had on their lives. This story is used as a foundational tool for empathy throughout the training.
- Class Discussion/Video: The Team discuss the value of diversity, equity, and inclusion which includes a video prompting a difficult but necessary discussion revolving around conscious and unconscious discriminatory practices.
- Class Discussion/Video: The team uses multiple videos on historical institutional biased laws, including the impact these laws had in the workplace, on housing (Redlining) and in neighborhoods. This is followed by a facilitated discussion, in small groups, with a focus on relating those issues to their everyday work and serving the community.



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- Training Module #2: Participants learn about and evaluate the impacts of institutional and historically biased laws and policies through an online trivia activity that includes historical content of the laws and policies.
- Video/Debrief: A deeper exploration of institutional housing bias is achieved via a video and group debrief. Students explore generational effects on their work as officers and the impact it may have on specific groups.
- Group Collaboration: Participants engage in a final activity involving group collaboration and decision-making as a means to understanding the concept of privilege and its effect on society and the public they serve.
- Overall: Participants take ownership of the material and unconsciously/consciously apply their own biases in making decisions in the classroom activity, providing opportunities for further self-reflection and discovery.

The core concepts of the above training were delivered through the adult learning model RIDEM (Relevance, Involvement, Discovery, Experience and Modeling). This model ensures participation and understanding from every member of the class.

Blue Courage-Inclusive Leadership (3-day course) Diversity and Inclusion Seminar (Optional, but there is always a waitlist) The philosophy is simple- "You don't have to be one to stand with". Key Lessons Learned are:

1. Defining Diversity, Cultural Inclusion & Humility
2. Identifying barriers to leadership
3. Identifying how barriers affect life, success, and relationships
4. Making commitments to work through those barriers

Leadership Development Institute (See Attachment #7: Department Notice 20-146; Application for SFPD Leadership Development Institute):

The Mission of LDI is to:

- Create thought and action through independence and teamwork.
- Create course and action through interdependence.
- Provide members with knowledge and skills to lead without the "stars and bars".

This course is facilitated through discussion, open respectful dialogue, and dynamic engagement of shared experiences. The focus is to develop each student in a positive learning environment that encourages inclusion and acceptance.



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This course is 12-month long program; it is predicated on available funding. The SFPD started the 3<sup>rd</sup> cohort in January of 2021. The department has partnered with Blue Courage LLC. Blue Courage LLC is endorsed by International Association of Directors of Law Enforcement Standards and Training.

### **2) Policy that requires all officers to complete implicit bias and cultural competency training.**

Department General Order 5.17; Sect C, 2 provides information on the policy that requires all officers to complete implicit bias and cultural competency training. (Revisit Attachment #4: DGO 5.17)

2. The Training Division shall ensure that both sworn and civilian members of SFPD attend training that is consistent with legislative, Peace Officer Standards and Training (P.O.S.T.) and SFPD requirements, including but not limited to:

- a. Equal Employment Opportunity/Harassment
- b. Principled Policing and Procedural Justice
- c. Racial and Cultural Diversity and Racial Profiling
- d. Creating an Inclusive Environment
- e. Managing Implicit Biases
- f. Bias by Proxy

The required training as of 2020 is included in the attached PRE-CRI and POST-CRI training, policy and procedures grid (See Attachment #8; SFPD Bias Training Comparison).

### **3) Evidence of training review and effectiveness.**

Following the prescreen meeting on 12/28/20 with Cal DOJ and Hillard Heintze, the feedback below was provided and has been addressed in Compliance Measure 3:

“First, the language under this Compliance Measure starts with: “For all new training programs, the above evaluation and follow up impact evaluation audit and evaluation system are in place. This consists of reviewing student evaluations completed directly after the course, as well as follow up training impact evaluations received 4 months later.” The Form 2001 does not reference any evaluation and follow up impact evaluation audit earlier in Compliance Measures 1 or 2 so Cal DOJ asked that SFPD revise this language.

Second, the narrative under Compliance Measure 3 states: “The Professional Development Unit has an officer assigned who oversees reviewing and implementing all bias related training and subjects. This officer reviews new training programs regarding bias provided to members of the San Francisco Police Department.” Cal



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DOJ asked that SFPD provide some documentation supporting this statement (such as a policy requiring this assignment).

Third, the narrative under Compliance Measure 3 repeats language in Compliance Measure 1 about working with experts in the field of implicit bias and the evaluation by Dr. Hetey. Rather than repeat that information in Compliance Measure 3, SFPD can just reference the language in Compliance Measure 1 (that is, state that SFPD also worked with experts in implicit bias, as described in more detail in Compliance Measure 1)."

At the direction of the Captain of the Academy, the Professional Development Unit (PDU) has a designated officer who oversees and reviews bias related training and subjects. Training Division Unit Order #21-02 establishes the policy of the PDU to review/audit bias training programs and incorporate results into a quarterly memorandum report. This unit order further explains how the appointed member of the PDU is responsible for auditing bias training for effectiveness, delivery, and quality of course instruction. (See Attachment #9 Training Division Unit Order #21-02; Audit and Review of Bias Training Programs).

In addition, this assigned PDU member remains in contact with DHR, who offers outside training, such as in the Managing Implicit Bias Class. This assigned PDU officer periodically also attends the DHR classes to audit for effectiveness and quality of course and instruction. When the Managing Implicit Bias class was altered to a remote format, due to COVID19, the assigned PDU officer audited the effectiveness of the new virtual class. Instructors will continue to evaluate course content based on input from the PDU, and institute "improvement loops". (See Attachment #10; Training Division Unit Order #21-01; Follow up email regarding instructor input improvement loop)

As discussed at length in Compliance Measure #1, Dr. Rebecca Hetey reviewed our training process in 2017 and provided us with insight and guidance on answering tough questions about bias and cultural awareness. For full details, please review the information provided in Compliance Measure #1 and revisit (Attachment #6: Written Evaluation by Dr. Rebecca Hetey).

Also discussed under Compliance Measure #1 is how the SFPD effort has been in understanding the science, not just learning how to present material. The department has discussed ideas with Dr. Jennifer Eberhardt (Stanford University), Dr. Rebecca Hetey (Stanford University, Cal POST Instructor, RIPA Contributor), and Dr. Jack Glaser (UC Berkeley) on the science of mitigating negative bias impact. The department also seeks to understand how law enforcement contributes, both negatively and without intention to stereotypes.

#### **4) Evidence of supportive and remedial action if deficiencies are found – including failure to attend training.**



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Following the prescreen meeting on 12/28/20 with Cal DOJ and Hillard Heintze, the feedback below was provided and has been addressed in Compliance Measure 4:

"SFPD states that bias-related training is mandatory for all members, but Cal DOJ noted that SFPD does not include any information (such as an audit) about actual attendance with this training requirement. SFPD explained that it does conduct training audits that are usually around 98%, but there will never be 100% compliance for a variety of reasons, including that some members might be on leave when the bias training is offered. Cal DOJ asked that SFPD include information and documentation about the training audit, the attendance rates, and explain why there isn't full compliance (such as, members may have been on leave). To the extent someone is simply non-compliant, SFPD can explain the remedial action (e.g., they are signed up for the next available training).

Hillard Heintze also noted that the package included several older department bulletins (that are over 2 years old), which SFPD explained were included to show the progression of their bias training and policies related to bias issues. Hillard Heintze broadly advised that SFPD should look into these older department bulletins and develop a plan to incorporate these into new or existing department general orders, consistent with DGO 3.01."

Bias related training is mandatory for all members of the San Francisco Police Department. All sworn members are scheduled to complete this training in the aforementioned courses, as well as during their mandatory Advanced Officer and Continued Professional Training (AO/CPT) at the San Francisco Police Academy. Training is ongoing and provided during AO/CPT which is required every two years to maintain state licensing in accordance with the Peace Officer Standards and Training (POST).

The SFPD BAT team conducted an audit of bias related training which shows that the department is at 98% compliance. The dynamic movement of personnel, whether it be through attrition or simply through different kinds of leave, whether through Family Leave Act, disciplinary action, or extended personal leave, the SFPD will always have a minute percentage of members, and/or new hires waiting to be trained. (Revisit Attachment #1: Bias Training Audit)

When a member returns from an extended leave, such as those described above, the member is required to gain compliance immediately upon their return. SFPD Form 502; Return to Patrol Program Completion Report, is completed by the returning member and forwarded to the SFPD Academy. This report mandates that members returning to duty must attend training and acknowledge any written policy they may have missed while away. (See Attachment #11; SFPD Form 502; Return to Patrol Program Completion Report).



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A failure to acknowledge written orders and/or attend training is subject to disciplinary action in violation of DGO 2.01, Section 10, Failure to obey all written orders, policies, and procedures of the department. Any officer or civilian not in compliance with general orders will warrant an administrative investigation, scheduled training, and/or disciplinary action. (See Attachment #12: DGO 2.01, Section 10)

Finally, as a remedial action, in August of 2020, the SFPD implemented the web-based software system PowerDMS as a replacement for HRMS. Power DMS is now used for signing off on all Department Bulletins (DB). Members now have access to Power DMS to search DGOs, DBs/DNs, Manuals, Bureau/Unit Orders, and forms. With Power DMS, members also have easy access to a keyword searchable database. The SFPD distributed training manuals for Power DMS in Department Notice 20-122, including a user guide that provided general instructions for logging in, completing training, signing policies, and navigating through Power DMS. (See Attachment #13: Department Notice 20-122 Power DMS Live Announcement).