

[REDACTED]

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**From:** Tanya Koshy [REDACTED]  
**Sent:** Friday, September 10, 2021 1:22 PM  
**To:** [REDACTED]  
**Subject:** CORRECTED email re: Recommendation 67.2

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Dear Acting Captain Altorfer,

Below please find a corrected email finding SFPD in substantial compliance with Recommendation 67.2. The additional language is in bold font.

Thank you,

Tanya

Tanya S. Koshy (she/her)  
Deputy Attorney General  
Civil Rights Enforcement Section  
California Department of Justice  
1515 Clay Street, Suite 2100  
Oakland, CA 94612

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**From:** Tanya Koshy  
**Sent:** Thursday, August 5, 2021 4:22 PM  
**To:** [REDACTED]  
**Subject:** Recommendation 67.2

Dear Acting Captain Altorfer:

Our office has completed its review of the materials related to Recommendation 67.2 that have been submitted to us as part of the collaborative reform process. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

Recommendation 67.2: Supervisors should be provided with quarterly reports that integrate individual actions, as is currently reported by the Early Intervention Systems (EIS) Unit, with aggregated information that provides complaint and misconduct data trends for the watch, district, and city.

Response to Recommendation 67.2:

SFPD supervisors receive quarterly EIS and complaint data reports. With respect to EIS reports, the Department notifies supervisors, on a real time basis, if a member exceeds threshold factors and generates an EIS alert. On a quarterly basis, the Department also aggregates EIS alerts into a quarterly report and makes this report available to supervisors, as well as the Police Commission and the public.

The Department of Police Accountability (DPA) provides a weekly and a quarterly report of civilian complaints received by DPA, which includes the District/Unit of the underlying allegation of misconduct, a summary of the complaint including the allegations of misconduct, and the officer(s) involved (if identified). SFPD Captains receive the portion of the weekly and quarterly reports concerning members under their command and Command staff receive the full reports.

The DPA also provides the underlying data on civilian complaints in an Excel spreadsheet. The SFPD's Business Intelligence Unit (BIU) uses the data in the Excel spreadsheet to create a quarterly trend analysis report. This trends analysis report breaks down the DPA civilian complaint data by watch, district, quarter, and underlying allegation. The BIU then forwards the report to the Officer in Charge (OIC) of the Internal Affairs Division (IAD) who is tasked with forwarding it to the Deputy Chief of the Field Operations Bureau (FOB). SFPD codified the quarterly trends analysis reporting process in Internal Affairs Division Unit Order 20-06.

The FOB Deputy Chief facilitates a quarterly Captains meeting, which is attended by the Commanders of Metro and Golden Gate Divisions along with the District Station Captains. The meeting attendees must discuss, among other topics, the trends analysis report. Meeting attendees use the report to identify trends, reoccurring themes, potential underlying causes, remedies, and to evaluate successes of any of those remedies. This process is codified in FOB Bureau Order 20-05. Captains are then tasked with addressing issues emerging from the civilian complaints within their commands and must document the actions they take to address those issues in a quarterly Captain's Memorandum. The FOB OIC must maintain a log of quarterly reports Captain's Memorandum and conduct an audit and review of the quarterly reports in December of each year.

**Based on all of the above, the California Department of Justice finds SFPD in substantial compliance with this recommendation.**

Please let us know if you have any questions or would like to discuss these further.

Tanya

Tanya S. Koshy (she/her)

Deputy Attorney General

Civil Rights Enforcement Section

California Department of Justice

1515 Clay Street, Suite 2100

Oakland, CA 94612

[REDACTED]

[REDACTED]

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<b>Finding # 67</b>	<b>The SFPD does not analyze trends in complaints, situations that give rise to complaints, or variations between units or peer groups in relation to complaints and misconduct.</b>
<b>Recommendation # 67.2</b>	Supervisors should be provided with quarterly reports that integrate individual actions, as is currently reported by the Early Intervention Systems Unit, with aggregated information that provides complaint and misconduct data trends for the watch, district, and city.

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

**Summary**

Compliance Measure # 1 - SFPD has developed a robust system for tracking and reporting EIS as documented in this file. It also shares DPA information with supervisors through the Henderson Report and the Business Intelligence Unit.

Compliance Measure # 2 - Both the DPA data and EIS is shared quarterly.

Compliance Measure # 3 - the department shares this information via the quarterly captain's meetings, an acceptable substitution for the CompStat meeting.

Based upon the data shared the department meets the compliance measures; however, additional work is needed to ensure that the internal IA complaint data is shared in a similar process as well as slicing all of the data down to work units and shifts to allow for visibility for supervisors as to what complaints are originating from their unit.

Compliance Measures		Status/Measure Met
<b>1</b>	Provide reports to supervisors with both EIS and active complaint and misconduct information for subordinates.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>2</b>	Provide information to supervisors on a quarterly basis.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>3</b>	Discuss trends and actions at quarterly CompStat meetings, concurrent with Rec 67.1.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

**Administrative Issues**

**Compliance Issues**



## Collaborative Reform Completion Memorandum

**Finding # 67:** The SFPD does not analyze trends in complaints, situations that give rise to complaints, or variations between units or peer groups in relation to complaints and misconduct.

**Recommendation # 67.2** Supervisors should be provided with quarterly reports that integrate individual actions, as is currently reported by the Early Intervention Systems Unit, with aggregated information that provides complaint and misconduct data trends for the watch, district, and city.

**Response Date: 03/22/2021**

### Executive Summary:

Since February 2019, the DPA has disseminated the Henderson Report to the Command Staff, Risk Management Office, and the Captains of subject officers via email. The Captains only receive the portion of the report that is specific to accused members under their command.

The SFPD Technology Division now receives DPA's Henderson Report and incorporates that source data into Oracle Analytic Server (OAS), which is an upgraded version of Oracle Business Intelligence Enterprise Edition (OBIEE). OAS is used to produce a trend analysis version of the Henderson report. Prior to upgrading to OAS in September of 2020, outside data could not be integrated with SFPD's governed data models in OBIEE, and thus it was not possible to generate the trend analysis report required by this recommendation. This report is divided by watch, district, and citywide categories and will be distributed on a quarterly basis to the Command Staff and District Station Captains.

The first presentation of the Quarterly Trend Analysis Henderson Report was occurred on November 5<sup>th</sup>, 2020 at the Field Operations Bureau (FOB) Quarterly Captains Meeting. Going forward, the Quarterly Trend Analysis Henderson Report shall be presented and discussed at all Quarterly Captains Meetings.

Per FOB Bureau Order 20-05, after the presentation of the Quarterly Trend Analysis Henderson Report Captains will be tasked with using the new report to compare statistics from the previous quarter. After completing their comparison, Captains must author a Quarterly Memorandum explaining their analysis, accounting for any changes in complaint trends, and detailing their plans to mitigate any problematic trends. This Memorandum is then submitted to the Deputy Chief of the Field Operations Bureau. The Lieutenant of FOB is responsible for maintaining a log of the Memorandums to ensure their timely completion, and in December of each year, the Lieutenant will perform an audit to ensure that the Memorandums include the necessary information detailed in FOB Bureau Order 20-05. Should the Lieutenant of FOB discover any deficiencies in the Memorandums, he will alert the Deputy Chief of the Field Operations Bureau, who will take corrective action, as necessary.



## Collaborative Reform Completion Memorandum

### Compliance Measures:

- 1. Provide reports to supervisors with both EIS and active complaint and misconduct information for subordinates.**

Per DGO 3.19 Early Intervention System, supervisors are provided with Early Intervention System (EIS) alerts as members exceed threshold factors and generate an alert. The EIS system is a structured system that identifies and manages behaviors that result in performance-related problems by individual members. EIS indicators against a member are compiled in a tiered threshold system that creates an alert on the member's EIS file, which is later reviewed by the EIS Unit and forwarded to the member's direct supervisor. (Attachment #1) *DGO 3.19 Early Intervention System*

The Department also compiles quarterly EIS reports that are presented to the Police Commission and are available for supervisors and the public to access on the Commission and SFPD websites. This quarterly EIS report provides data for the current quarter, compares the current quarter to previous quarters, and provides a clear explanation of how the EIS alert system works. (Attachment #2) *Screenshots of EIS Reports on SFPD Website*

The DPA compiles a list of the complaints it receives and creates a document called the Henderson Report in order to have a complete list of complaints and enable the identification of trends.

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

*Hillard Heintze discussed the recommendations jointly and had three main questions for SFPD about these recommendations:*

- (1) how the department came to its plan regarding Henderson data;*
- (2) how SFPD acted upon the data since 2017*
- (3) Located on pg. 6 in CM #3*

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

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



## Collaborative Reform Completion Memorandum

The Captains only receive the portion of the report that is specific to accused members under their commands. The Command Staff receives the full report of all accused SFPD members. Other than the Henderson Report, the DPA does not provide the SFPD with any information regarding in-progress complaints. (Attachment #3) *Example of Weekly DPA Henderson Report (redacted)*)

In March 2020, SFPD reached out to DPA and asked if they would be able to provide a Quarterly version of the Henderson Report as well as the underlying data (contained in an Excel spreadsheet). Although the data was limited in scope, SFPD believed it would be of use for rudimentary examination/analysis of complaint trends. DPA's categories of misconduct allegations were too broad and non-specific: e.g. Neglect of Duty could be used for numerous types of allegations. A quarterly version of the Henderson Report is also emailed to SFPD Command Staff, Risk Management Office, and Captains of subject officers on a quarterly basis. The quarterly version is emailed to the SFPD in two formats: one formatted identically to the weekly version, and a data only version to allow for graphing and analysis of the data. Risk Management provides the data-only version to the SFPD Technology Business Intelligence Unit (BI) for trend analysis. (Attachment #4) *3<sup>rd</sup> Quarter 2020 Quarterly Henderson Report*, (Attachment #5) *Data-Only 3<sup>rd</sup> Quarter 2020 Quarterly Henderson Report (redacted)*, and (Attachment #6) *IAD Unit Order 20-06*)

On April 28, 2020, DPA was able to provide the SFPD with the underlying data from the new quarterly version. That data was then provided to SFPD's Business Intelligence Unit (BI) to evaluate for possible trends and graphical presentation ("Trend Analysis-Henderson Report") The Trend Analysis Henderson Report includes categorizing and visualizing the complaint data to assist in identifying trends and potential issues. Once potential issues are identified, they can be proactively addressed by Command Staff and District Station Captains. (Attachment #7) *Trend Analysis Henderson Report*.

Per FOB Bureau Order 20-05, the presentation of the quarterly Trend-Analysis Henderson Report shall be done at the Field Operations Bureau's (FOB) quarterly Captains meeting. On November 5, 2020, the DPA Complaint Trend Analysis Henderson Report was presented to the 3<sup>rd</sup> Quarter FOB Captains Meeting for the first time. (Attachment #8) *FOB Unit Order 20-05 "District Station Captains Quarterly Meeting Identifying DPA Complaint Allegation Trends and Remedy Steps* and (Attachment #9) *Third Quarter Captains Meeting Agenda*

### **2. Provide information to supervisors on a quarterly basis.**

The DPA completes a quarterly version of the Henderson Report. The quarterly Henderson report is emailed to SFPD Command Staff, Risk Management Office, and Captains of subject officers in the two versions discussed above. BI has recently begun compiling the data only version into the quarterly Trends Analysis Henderson Report. (Attachment #4, Attachment #5, and Attachment #6)

The quarterly Trends Analysis Henderson Report was presented to the 3<sup>rd</sup> Quarter FOB Captains Meeting for the first time on November 5, 2020. Going forward, the Trends Analysis



## Collaborative Reform Completion Memorandum

Henderson report will be presented at all quarterly Captains Meetings. (Attachment #7 and Attachment #8)

The Department compiles quarterly EIS reports which are presented to the Police Commission and displayed on the SFPD and Police Commission websites. Supervisors of officers who generate an EIS alert are notified of the alert regarding their officers as the individual alerts are generated. (Attachment #1 and Attachment #2)

### **3. Discuss trends and actions at quarterly CompStat meetings, concurrent with Rec 67.1.**

On January 14, 2021 SFPD Professional Standards Members participated in a conference call with members of Hillard Heintze and the California Department of Justice. During the prescreening, suggestions and guidelines were discussed for this recommendation as described below.

*SFPD will need to provide more detail on the actions Captains will take following this first quarterly meeting, including calendaring the next quarterly meeting. This additional detail will provide some assurance.*

After updating its server, SFPD Technology Business Intelligence Unit created a trend analysis report in Oracle Analytic Server (OAS). The trend analysis report could not be produced prior to the OAS upgrade in September of 2020 since Oracle Business Intelligence Enterprise Edition (OBIEE) did not have the ability to incorporate external data sources. DPA's Henderson Report is an external data source that SFPD Technology brings into OAS to create the Trend Analysis – Henderson Report. These reports are divided by watch, district, and citywide and will be distributed on a quarterly basis to the appropriate Captains.

Due to the discontinuance of CompStat, the presentation of the quarterly Henderson Report will be done at the Field Operations Bureau's (FOB) Quarterly Captains Meeting. These meetings are governed and run by SFPD Command Staff, Executive Directors, and Commanding Officers of all divisions. Each Captain will be tasked with addressing issues affecting their command and will document their actions on a memorandum to the Deputy Chief of FOB.

On November 5, 2020, the DPA Complaint "Trend Analysis Henderson Report" was presented to the 3rd Quarter FOB Captains meeting for the first time. In the report, Central Station was shown to have higher volume of complaints compared to other stations, however complaints had decreased for the Department as a whole. In subsequent meetings, these figures and others will be compared to the next report by quarter and the success of steps taken to address them can be evaluated. (Attachment #9)

Due to the fact that the first presentation of the Trends Analysis Henderson Report occurred on 11/05/2020, there has not yet been an opportunity for quarterly comparisons to be made. After





## Collaborative Reform Completion Memorandum

the next Quarterly Captains Meeting, District Station Captains will begin quarterly comparisons based on trend analysis, and author reports documenting their corrective actions and findings. The next Quarterly Captains Meeting is scheduled for March 4<sup>th</sup>, 2021. (Attachment #10)  
*Calendar Screenshot of Scheduled March 2021 FOB Captains Meeting*

FOB Unit Order 20-05 tasks Captains with addressing issues affecting their commands and documenting their actions in their Quarterly Captain's Memorandums. (Attachment #8)

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

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

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

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

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

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



## Collaborative Reform Completion Memorandum

*(3) whether the captains' quarterly meeting scheduled for today is occurring. SFPD responded by explaining the evolution from the Morning Report to the Henderson Report and how SFPD continually reviewed and improved the process. Hillard Heintze thought the explanation was helpful and also asked that SFPD include in the Form 2001 limitations SFPD has recognized and is working on. SFPD also verified that the captains' quarterly meeting is occurring today. For continuously improving the data that is reviewed, SFPD would like to add more context (for example, how protests in a district might effect the data). SFPD plans to gather the supporting documents for inclusion in the packages over the next week.*

After the first presentation, which had occurred on November 5, 2020 the report was reviewed and reassessed for clarity and ease of understanding on March 4, 2021. The revised report was provided to the Q1 2021 Captains Meeting. **(Attachment #11)** *Captain Quarterly Meeting Minutes*

Per FOB Bureau Order 20-05, after the presentation of the Quarterly Trend Analysis Henderson Report Captains will be tasked with using the new report to compare statistics from the previous quarter. **(Attachment #12)** *Henderson Report Q3 2020*

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

As a result of the March 4, 2021, Captains Meeting, District Station Captains completed and submitted their memos to the Deputy Chief of FOB, as outlined in FOB Bureau Order 20-05. **(Attachment #13)** *Captains Quarterly Meeting Memorandums*