Department of Police Accountability

Executive Director Paul Henderson

Executive Summary

San Francisco Police Department's Department (SFPD) General Order (DGO) 5.23 is focused on interactions with individuals who are deaf or hard of hearing but does not provide comprehensive guidance for officers engaging with a broader range of disabilities. This gap presents operational, legal, and reputational risks to the department. The Department of Police Accountability provides these actionable recommendations to modernize DGO 5.23 and improve officer preparedness while aligning with California Commission on Peace Officer Standards and Training (CA POST) guidance and the Americans with Disabilities Act (ADA).

To better align with ADA requirements and respond to community needs, we recommend expanding DGO 5.23 to include clear guidance for interacting with individuals with a broader spectrum of disabilities. To maintain usability, we also recommend streamlining the DGO and relocating detailed procedures and context to the disability manual (last updated 2008).

Key Gaps in Current Policy

- 1. DGO 5.23 is narrowly scoped to auditory disabilities.
- 2. Guidance for other disabilities (e.g., physical, cognitive, developmental, mental health) is scattered in other documents, outdated, or absent from policy.
- 3. Officers lack a quick-reference, scenario-driven tool for high-pressure encounters.
- 4. Data on disability-related stops is inconsistent and often implausible, undermining decision-making.

Clarifying California POST Standards for Disabilities

According to the **CA POST Learning Domain 37**, effective policing requires recognizing and appropriately responding to a wide range of disabilities including developmental, cognitive, neurological, and mobility impairments. Expanding SFPD DGOs to reflect a broader scope would align department policy with CA POST standards, ensure equitable treatment, and improve officer preparedness during encounters with individuals whose disabilities may not be immediately visible or crisis driven.

The working group should use POST Learning Domain 37 as a foundation to build a comprehensive policy framework that supports effective interactions across all disability groups.

Recommendations

Recommendation 1: Expand DGO 5.23 to Cover All Disabilities

Action: Rename the DGO to "Interacting with Individuals with Disabilities." Include guidance for physical disabilities, mental health conditions, and developmental disabilities.

Purpose: Cover a comprehensive range of disabilities.

Rationale: Expanding the scope aligns with ADA and CA POST guidance, reducing gaps in policy.

Recommendation 2: Streamline DGO Content and Update Companion Disability Manual

Action: Move procedural details into a separate, cross-referenced manual co-developed with the SF Office on Disability and relevant stakeholders.

Purpose: Ensure the DGO becomes usable as a quick-reference tool. Current DGO includes repetitive references (for example, exigency is explained multiple times) and overly procedural "if/than" steps.

Rationale: Officers cannot absorb granular details in procedures and apply them under pressure.

Recommendation 3: Improve Data Collection and Review Around Disability

Action: Assign a review of disability-related stop data to a specific unit or member.

Purpose: Identify patterns, ensure accuracy, and identify training gaps.

Rationale: current data quality is insufficient to inform policy or training effectively. Unreliable data erodes credibility. State law requires all law enforcement members to collect information on perceived disabilities during stops, but reports are occasionally implausible, such as:

- A one-year-old deaf woman stopped for failure to yield.
- A nine-year-old deaf transgender individual who was stopped on probation/parole.

Recommendation 4: Strengthen Officer Training

Action: Mandate COPS DOJ online training on intellectual and developmental disabilities for all officers, with re-training required after any critical incidents involving I/DD.

Purpose: Establish a department-wide baseline of understanding for I/DD.

Rationale: Free, expert-vetted training improves officer decision making.

About the San Francisco Department of Police Accountability's Policy Division

This report was prepared to fulfill DPA's mandate under San Francsico Charter Section 4.136(h) to provide recommendations concerning "policies or practices of the Police Department which could be changed or amended to avoid unnecessary tension with the public or a definable segment of the public while insuring effective police services."

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