Finding # 30	The weight of the evidence indicates that African-American drivers were disproportionately stopped compared to their representation in the driving population.
Recommendation # 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.

Recommendation Status	Complete Partially Complete In Progress Not Started No Assessment

Summary

All compliance measures have been met.

The SFPD complies with California Assembly Bill 953 Racial and Identity Profiling Act (RIPA) and Admin. Code 96A Law Enforcement Reporting Requirements. Department policies were drafted to support compliance, and the Business Analysis Team tasked with clearing data to ensure its accuracy. Remedial and/or corrective measures include education and training.

Compliance Measures		Status/Measure Met
1	Establish a data collection plan consistent with Appendix F of original report and timeline for implementation.	√ Yes ☐ No ☐ N/A
2	Create or update relevant policies regarding the collection of data by officers based on best practices.	√ Yes ☐ No ☐ N/A
3	Evidence of review of the requirements to support this recommendation.	√ Yes ☐ No ☐ N/A
4	Evidence of supportive and remedial action if deficiencies are found.	√ Yes ☐ No ☐ N/A

Administrative Issues

This review team notes that the issue discussed regarding scrubbing data prior to submission has not been addressed as of this submission.

Compliance Issues

Collaborative Reform Completion Memorandum

Finding # 30: The weight of the evidence indicates that African-American drivers were disproportionately stopped compared to their representation in the driving population.

Recommendation # 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.

Response Date: 10/22/2020

Executive Summary: At the time of the original submission of the Collaborative Reform Initiatives(CRI) the San Francisco Police Department was in the process of rolling out the E-Stop system, which increased the collection of stop data collection to include vehicle, bicycle, and pedestrian stops. The move from E585 to E-Stop also expanded the amount of information collected on each stop. The department had an established, and in process, implementation timeline, and had made the expansion of stop data collection and implementation of e-Stop a priority in its Attachment #1: SFPD Technology 5 Year Roadmap. Data collection under e-stop was increased in response to the passage of Attachment #2: San Francisco Administrative Code Chapter 96A and Attachment #3: AB 935 RIPA STOP data regulations.

In July of 2018, the department transitioned to the Stop Data Collection System (SDCS), which further expanded the collection of data, meeting the recommendations of Appendix F, AB953, and CA DOJ requirements for the collection of stop data.

Under the initial roll out of e-stop, the department updated policy through the issuance of Attachment #4: Department Bulletin 16-208: eStop - Contact Data Collection Program. With the move to SDCS in 2018, the department updated policies on the collection of stop date with the issuance of Attachment #5: Department Bulletin 18-105; Stop Data Collection System (SDCS) Implementation

In the months following the roll-out of the SDCS, the Business Analysis Team noticed minor deficiencies in stop data entry in the SDCS. The Department took remedial action by creating formal instruction and updated training in subsequent policy bulletins which were issued to clarify issues with the proper documentation of data in the SDCS, see Attachment #6: Department Bulletin #18-247 Stop Data Collection System (SDCS) Implementation and Attachment #7: Department Bulletin 20-141: Stop Data Collection System. The department continues to conduct annual audits to ensure compliance with SDCS requirements. The issuance of the above listed bulletins serve as on-going evidence of remedial actions being taken based on deficiencies discovered through the on-going audit process, which is designed to ensure compliance with CRI recommendations, AB953 and administrative code 96A.

Collaborative Reform Completion Memorandum

Compliance Measures:

1) Establish a data collection plan consistent with Appendix F of original report and timeline for implementation.

At the time of the original submission for CRI Recommendation 35.1, dated November of 2016, the department had transitioned from the E585 data collection system to the E-Stop system. The E-Stop system expanded collection of data related to all stops by SFPD members involving not only motorists, but also bicycles and pedestrians. With the implementation of E-Stop, the E585 system was no longer used as a means for collection. This transition occurred when the City and County of San Francisco passed an ordinance establishing Attachment #2: Administrative Code Sec. 96A, Law Enforcement Reporting Requirements. The introduction of this legislation in January 2017 by, then Supervisor, Malia Cohen, involved a collaboration with the Supervisor and the SFPD which resulted in the implementation of the E-STOP system. The State of California then introduced AB953, Racial Identity Profiling Act, for stop data concurrent to SFPD's E-Stop data collection. For the full text document on this law, see Attachment #3: AB953, Racial Identity Profiling Act (RIPA) Stop Data Regulations.

With the implementation of Administrative Code Section 96A, the department began development and implementation of the E-Stop system, which was also compliant with recommendations listed in Appendix F of the original report. The development times line was laid out in Attachment #8: July 27th, 2016 e-Citation/e-stop meeting PowerPoint. The timeline took into account not only Administrative Code 96A requirements, but also the implementation of AB-953 guidelines. The initial development timeline was later updated to include an implementation timeline in the Attachment #9: August 31, 2016 eCitations/eStops meeting PowerPoint. The timeline for eStop development and deployments was established as follows:

- May-July 2016- Design
- June-August 2016- Code
- August-October 2016- Test
- August-December 2016- Infrastructure upgrades
- August-December 2016- Develop Training, Department Bulletin
- October-December 2016- Pilot at one station for non-traffic encounters
- November-December 2016- Pilot all station non-traffic encounters
- December 2016- March 2017- Pilot Board of Supervisors Reporting
- January-March 2017- Deploy to all stations
- May 20017- Deploy Quarterly Board of Supervisors Reporting

Full implementation of eStop became effective in November 2016 with the issuance of Attachment #4: Department Bulletin 16-208: eStop - Contact Data Collection Program,

which complied with 96A requirements, as well as AB953 and appendix F guidelines. Implementation and roll out was further reinforced in the Attachment #1: SFPD Technology 5 Year Roadmap.

2) **Create or update relevant policies regarding the collection of data by officers based on best practices.**

With the move to the e-stop system, the department issued Attachment #4: Department Bulletin 16-208: eStop - Contact Data Collection Program. This bulletin updated stop data collection policies, and superseded prior bulletins and policies related to the collection of stop data under the old E585 system. On July 1st, 2018, the SFPD implemented a new system, the Stop Data Collection System (SDCS) which complies with AB953. The SDCS entry is completed for all stops, including but not limited to pedestrian, bicycle and vehicle stops. Furthermore, members are required to enter all stop data into the SDCS prior to the end of their shift. Department-wide training for the SDCS was distributed in Attachment #5: Department Bulletin 18-105; Stop Data Collection System (SDCS) Implementation on May 31, 2018.

Attachment #5: Department Bulletin 18-105; Stop Data Collection System (SDCS) Implementation included an additional training packet with Attachment #12: The Stop Data Collection Form, Attachment #10: SDCS Web Application Manual, Attachment #11: SDCS data entry tips, and the aforementioned Attachment #3: AB953, RIPA Stop Data Regulations. Per Attachment #5: Department Bulletin 18-105; Stop Data Collection System (SDCS) Implementation, members were to become familiar with the training materials in Attachment #12: The Stop Data Collection Form #2000, Attachment #10: SDCS Web Application Manual, Attachment #11: SDCS data entry tips and Attachment #3: AB953, RIPA Stop Data Regulations no later than June 30th, 2018.

With the evolution of stop data collection from E585 to SDCS, the department moved to collection of data for all stops: motor vehicle, pedestrian, and bicycle. This change expanded the amount of enforcement data we were collecting, ensuring not only compliance with this CRI, but also with the following additional CRI's:
- 34.1
- 34.2
- 34.3
- 35.1

As part of the department's compliance with San Francisco Administrative Code 96A, the department includes enforcement data in its Attachment #13: Chapter 96A Q2 2020 Executive Summary. Attachment #13: Chapter 96A Q2 2020 Executive Summary includes data on the dispositions of all vehicle, bicycle and pedestrian stops entered in the SDCS. Arrest data for the report is obtained from Crime Data Warehouse, and includes data on all arrests including citation and booking.

Collaborative Reform Completion Memorandum

Current department policies and procedures have been informed by best practices communicated by the Racial and Identity Profiling Advisory (RIPA) Board in its Attachment #15: RIPA Board 2018 Annual Report.

In October of 2020, deficiencies in entries were identified through an internal audit of SDCS data, Attachment #16: Stop Data Collection System Inspection Report. Remedial action was taken to resolve these issues through the issuance of Attachment #7: Department Bulletin 20-141 on 10/07/2020, which addressed deficiencies identified by the audit, and provided remedial training to correct those deficiencies.

3) **Evidence of review of the requirements to support this recommendation.**

An ongoing review by the SFPD BAT Team in the way that SDCS data was entered revealed some consistent issues and created the need for an improvement loop. Therefore, SFPD members received an update on Attachment 5: Department Bulletin # 18-105: Stop Data Collection System (SDCS) Implementation, by issuance of Attachment #6: Department Bulletin #18-247 Stop Data Collection System (SDCS) Implementation. This subsequent bulletin clarified the use of the SDCS. The SFPD continues monitor SDCS entry and train new members at the academy on the proper entry of data into the SDCS.

The SFPD Business Analyst Team (BAT) reviews SDCS entries and completes a data cleaning process prior to summarizing said data in quarterly reports, such as Attachment #13: Chapter 96A Q2 2020 Executive Summary. Data cleaning refers to identifying incomplete, incorrect, inaccurate or irrelevant parts of the data and then replacing, modifying, or deleting the dirty or coarse data. For our purposes, this process ensures that data does not reveal Personally Identifiable Information(PII) or exact address data, and is explained in Attachment #17: data cleaning process. The BAT team discovered that exact addresses were being entered vs. the nearest intersection. The updated training in Attachment #6: Department Bulletin #18-247 Stop Data Collection System (SDCS) Implementation, in addition to the data cleaning process (as described in Attachment #17: Data Cleaning Process) created a significant improvement loop in ensuring sufficient and accurate data collection.

Immediately after roll out of the SDCS, some deficiencies in entries to the SDCS were discovered by the SFPD, as described in Attachment #18: Department Wide Emails. As an improvement loop for this, emails were sent to all members describing corrective measures for entering data in the SDCS, and reminding members of available resources and training materials available on the department intranet. Those resources have since been migrated to PowerDMS, which was rolled out as part of CRI recommendations 76.1 and 76.2. When the SDCS was first rolled out, it was only available on the department desktop computers. Shortly after rollout, however, a significant improvement loop was accomplished when the SFPD included the SDCS on

PSPPB Form 2001 v2

Collaborative Reform Completion Memorandum

department issued cell phones. This additional access point for SDCS was communicated to members through <mark>Attachment #18: Department Wide Emails</mark>. This improvement allowed data entry for the SDCS on the member's work cell phones as an app, while in the field via the MDT or on station computers for ease of access and submission of data prior to the end of a members shift.

To ensure accuracy in data collection, the BAT team has the ability to audit training records to make sure members are up to date on SDCS related policy and training. <mark>Attachment #19: Audit Report for Department Bulletin 18-105: Stop Data Collection System (SDCS) Implementation from 9/6/18 compared to 5/6/20</mark> shows a significant improvement in the percentage of members who were trained on the SDCS. Sign-off for department bulletin 18-105 went from 87% in 2018 to 98% in 2020.

As part of the departments audit/review/improvement loop, the department conducted an audit of SDCS data, <mark>Attachment #16: Stop Data Collection System Inspection Report</mark>. This audit will be conducted on an annual basis as part of a continual audit/review/improvement loop.

This audit focused on review of the following SDCS fields:

1)   Whether officers entered the subject's PII in the narrative portions of SDCS
2)   Whether officers entered the identity of any officer, CAD number, citation number, incident number, or confidential investigative technique or source
3)   Whether the descriptions entered by the officers in the narrative fields were consistent with the identified reason for the stop and/or search
4)   Whether officers entered the correct format for the location of the stop

The following are the findings of that audit:

Finding #1 – 100% compliance. No PII information was identified from the 94 SDCS samples examined.

Finding #2 – 100% compliance. No unique identifying information was identified from the 94 SDCS samples examined.

Finding #3 – 96% compliance. Of the 94 SDCS samples examined, SIU found that 96% or 93/96 were consistent. Consistency occurs when information in the open narrative field is consistent with identifiers chosen for the reason for stop and/or search.

Finding #4 – 75% compliance. Of the 94 SDCS samples examined, SIU found that 75% or 75/94 followed the proper location format, however, 25% or 19/94 entries failed to apply the same location format

The SMB leadership has also ordered the SIU to identify the above topic and its detailed objectives as a subject of an annually recurring audit. The SIU Monitoring

Collaborative Reform Completion Memorandum

Team - that is tasked to determine whether an inspection topic should be revisited at the conclusion of the improvement loop process, has been notified of the order from the leadership as detailed in Attachment #14: SDCS Audit Memo.

Remedial action was taken to resolve these issues through the issuance of Attachment #7: Department Bulletin 20-141: Stop Data Collection System on 10/07/2020, which addressed deficiencies uncovered by the audit, and provided remedial training to correct those deficiencies.

4) Evidence of supportive and remedial action if deficiencies are found.

The most significant remedial action by the SFPD regarding this recommendation was the transition from the E585 data collection system to the E-Stop system and finally to the Stop Data Collection System (SDCS) which complies with AB953: Racial Identity Profiling Act. For the full text document on this law, see Attachment #3: AB953, Racial Identity Profiling Act (RIPA) Stop Data Regulations. The SDCS entry is completed for all stops, including but not limited to pedestrian, bicycle and vehicle stops. Prior to the move to SDCS, stop data was only collected for vehicle stops, and the move to SDCS corrected that deficiency. Furthermore, members are required to enter all stop data into the SDCS prior to the end of their shift.

When the SFPD was informed by the SFPD Business Analyst Team (BAT) and the California Department of Justice (DOJ) of deficiencies and errors found in the SDCS entries by members, additional supportive and remedial actions were taken. Training occurred via the issuance of Attachment #6: Department Bulletin # 18-247: Stop Data Collection System (SDCS) Implementation, which served to supplement and clarify proper data in-put protocol, which was initially summarized in Attachment # 5: Department Bulletin #18-105: Stop Data Collection System (SDCS) Implementation.

After members were retrained, as discussed above, the SFPD BAT team was able to correct prior entry errors by cleaning the data, as shown in Attachment #17: SDCS data cleaning process. The BAT Team downloads the SDCS stop data and corrects the PII entry errors by geographic re-coding to the nearest intersection when address information is entered as an exact location.

As shown in the Attachment #18: Department emails, it is also noted that when the SDCS was first rolled out, it was only available on the department desktop computers. Shortly after rollout, however, remedial action was accomplished when the SFPD included the SDCS on department issued cell phones. This action supported members with the ease of access and submission of data prior to the end of a members shift.

In October of 2020, further deficiencies were identified through an internal audit of SDCS data, Attachment #16: Stop Data Collection System Inspection Report. Remedial action was taken to resolve these issues through the issuance of Attachment #7:

Collaborative Reform Completion Memorandum

Department Bulletin 20-141 on 10/07/2020, which addressed deficiencies identified by the audit, and provided remedial training to correct those deficiencies.

UPDATE 1.5.2020:

After completion of this recommendation, the SFPD Business Analysis Team (BAT) formalized the process of data cleaning for SDCS stop data with the issuance of a Bureau Order. This Bureau Order described how the BAT team is able to correct PII data entry errors through a process of data cleaning involving geographic re-coding to the nearest intersection when address information is entered incorrectly. (See Attachment 20: Unit Order for SDCS PII Removal & Geocoding Procedures).