### **Recommendation 39.4**

	GM	
Gabriel Martinez		
Fri 7/23/2021 3:14 PM		
To:		

- Tanya Koshy
- McGuire, Catherine (POL);
- Scott, William (POL)

#### +8 others

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Acting Captain Altorfer,

Our office has completed its review of the materials related to Recommendation 39.4 that were submitted to us as part of the collaborative reform process. This package focused on SFPD creating processes to identify and address training needs. After reviewing the package and information provided by the Department, the California Department of Justice finds as follows:

<u>Recommendation 39.4</u>: A training needs analysis must be conducted to support the training requirements recommended in this assessment. The SFPD must conduct an analysis of the needs across the organization, identify the benchmark for training, and develop a prioritized training plan based on the needs analysis. This will require solid support from the Office of the Chief of Police and the command staff if it is to succeed in strengthening the content, quality, and timeliness of the department's training. This should be completed within nine months of the issuance of this report.

<u>Response to 39.4</u>: SFPD has instituted processes to ensure training gaps are identified and addressed. On December 11, 2020, SFPD issued Unit Order 20-05 "The Professional Development Unit's Role as Clearinghouse for Training Needs Analyses." Under the Unit Order, the Professional Development Unit serves as a centralized training clearinghouse for the Police Academy. Professional Development Unit will coordinate both internal Academy training needs and analyses of the basic curriculum (e.g., Force Options Simulator, Range, Emergency Vehicle Operations) as well as the training needs outside the Academy for units and members outside the Training Division. The Professional Development Unit will provide its technical and administrative training expertise to help implement trainings outside the Academy. To ensure follow-up, the Professional Development Unit will log requests for assistance, meet with all SFPD Training Coordinators quarterly for briefing on new training and for feedback on training needs, and issue bi-annual reports on the requests received and how the requests were addressed.

To ensure training needs are identified during policy development, on November 20, 2020, SFPD published Program Standards and Professional Policing Unit Order 20-03, "Consideration of Policy Implementation Support Factors as Part of Policy Development Process." The Unit Order outlines the process regarding policy implementation, including a checklist that includes training, creating or updating forms, software and IT updates, equipment, and personnel redeployment. For example, recent updates to the Use of Force Policy required a Policy Implementation Leader and implementation steps of training support, updated forms, and software.

New policies often require roll-call training to update officers on the new policies. That process is codified in Professional Development Unit Order 20-01, "Roll Call Training Development, Issuance, Procedures, and Compliance," issued July 29, 2020. The Training Division is consulted on all roll-call trainings and creates materials for training coordinators to administer monthly roll-call trainings.

SFPD has instituted different review boards that review incidents to inform training needs and improvements. These include the Discipline Review Board (DRB), the Firearm Discharge Review Board (FDRB), the In Custody Death Review Board (ICDRB), and the Collision Board of Review (CBOR). These various Board roles and responsibilities are codified in General Orders 2.04, 3.10, 8.12, and 3.07. The DRB meets quarterly and consists of SFPD Command Staff, a member of the Police Commission, and the Director of the Department of Police Accountability (DPA). The DRB is tasked with aggregating trends related to DPA and Internal Affairs complaints. The DRB reviews policy failure or training failure cases and selects sustained cases from the previous quarter to determine the need for training or policy changes. The first DRB meeting was held on February 11, 2020, and, after a hiatus due to COVID-19 restrictions, DRB meetings resumed in October 2020. For the Fourth Quarter Disciplinary Review Board Meeting in 2020, the DRB composed a memorandum with nine recommendations, including recommending that SFPD add a requirement that officers who receive a sustained discourtesy complaint go to specific training to address discourtesy.

The FDRB reviews firearm discharge incidents to ensure that the department is continually reviewing its firearms training, policy, and procedures. The FDRB includes the commanding officer of the Training Division and the officer in charge of the Field Tactics Force Options (FTFO) Unit as advisory members. The FTFO conducts its own, non-punitive, inquiry regarding tactics used in an incident and issues reports that include recommendations for new or updated training. The FTFO Unit develops and modifies training based upon their analysis of officer-involved shootings. SFPD is in the process of revising General Order 3.10 which will broaden the scope of review to serious incidents.

The ICDRB reviews in-custody deaths to determine if the SFPD members acted reasonably within policy at the time of the death. The ICDRB evaluates the SFPD's training, policies, and procedures in light of the incident to identify gaps and areas for improvements. The ICDR presents a written summary of findings to the Chief that includes its training analysis. Finally, the Collision Board of Review (CBOR), reviews officer-involved collisions. A member of the Emergency Vehicle Operations (EVOC) Unit is a non-voting member of the CBOR panel, and CBOR communicates their findings to the EVOC Unit to develop training to address any gaps or improvements.

Based upon all of the above, the Department of Justice finds that SFPD is in substantial compliance with this recommendation. Please let us know if you have any questions or would like to discuss these further.

### Hillard Heintze File Review Recommendation # 39.4

Finding # 39	The SFPD does not have a department-wide strategic plan that articulates a mission and identifies the goals and objectives necessary to deliver overall policing services.
Recommendation # 39.4	A training needs analysis must be conducted to support the training requirements recommended in this assessment. The SFPD must conduct an analysis of the needs across the organization, identify the benchmark for training, and develop a prioritized training plan based on the needs analysis. This will require solid support from the Office of the Chief of Police and the command staff if it is to succeed in strengthening the content, quality, and timeliness of the department's training. This should be completed within nine months of the issuance of this report.

Recommendation Status	Complete Not Started	Partially Complete No Assessment	In Progress
National Vision			

#### Summary

This is a broad-based recommendation and goes beyond a single return. Since the initial assessment in 2016, the SFPD has undertaken an organizational approach to reform – engaging at every level of the organization to identify gaps and improve police services. While this recommendation is placed within the community policing section, it really is about whole scale reform and how training can support it. The SFPD continues to drive this goal.

Compliance Measure #1 – the department identifies that it has taken on a holistic approach to training, reviewing the training needs across the five strategic areas of collaborative reform. In support of this, the Training Division authored a Unit Order to designate the Professional Development Unit to deconflict training and act as clearinghouse for future training development. Through this process, the Professional Standards and Principled Policing Unit ("PSPP") and the Training Division have actively reviewed the work product of the Project Managers and Executive Sponsor and/or Working Groups to fill training gaps. The department puts forth a well-supported approach in the training needs analysis, including evidence of a review of the work product including updated DGOs, new DBs, and multiple Unit Orders, where roll call trainings, training videos, current class modifications, and the development of new classes support CRI outcomes. Further, various groups and committees are assessing training – which going forward will be coordinated with the Training Academy.

Compliance Measure #2 – the needs analysis used by the SFPD is ongoing and continuous. In this regard, the SFPD provides ample evidence of a live process that addresses the overarching goal of engaged, continuous training that is developed as a result of a needs/gap analysis. For this reason, this compliance measure is not applicable.

Compliance Measure #3 - the department relies upon specific actions taken in support of the training arising from gap and needs analysis under CRI. Specifically, the department provides training review, planning and delivery for Crisis Intervention Training and Use of Force. These were well planned and delivered. Ongoing training review and gap analysis continues through various entry points, but the order with the Training Academy will ensure better and ongoing coordination.

Compliance Measure #4 – the department offers evidence of focused structural changes to support training needs, including a platoon concept review that increases training availability and is used to plan for mandated training. The department also identifies specific training courses and actions, such as annual review under order for gaps.

Compliance Measure #5 – the department provides specific trainings and presentations that evidence leadership support, including a new leadership institute. The commitment to training, and overall support of reform, is evidenced by

### Hillard Heintze File Review Recommendation # 39.4

the decisions of the Chief and the executive team. Training is not free – and it comes at the expense of street policing, which is the key function of any law enforcement organization. The investment in people, resources, time and actual training is significant for SFPD over the period of reform. This would not have happened without leadership support.

Compliance Measure #6 – the department identifies that as part of its continuing improvement loop there are several boards and working groups that feed into the training process. Additionally, there are surveys post-training, input to the Chief under the Office of Innovation and a more nimble training plan that provides monthly training. The Professional Development Unit also works as a clearing house for training materials and coordination – which has a goal of ensuring consistency in availability and focus. There is also an ongoing review of training needs arising out of this process. However, since the initiation of reform the department has engaged in significantly more focused development of training in response to issues across the organization. Early on, efforts were made to address engagement with bladed weapons – the department modified training and upon subsequent review, further did so to ensure fidelity to the goal of safer outcomes. The iterative process of identifying an issue and developing training that is reviewed and subsequently improved is very much evident with the use of force training.

ompliand	e Measures	Status/	Measure	e Met
1	Evidence that the department has conducted a training needs analysis across the organization that supports the training requirements recommended in this report.	√ Yes	□ No	□ N/A
2	The needs analysis completed by July 12, 2017.	□ Yes	D No	⊠ N/A
3	Evidence the department identified benchmarks for training to support development of the needs analysis.	√ Yes	🗆 No	□ N/A
4	Evidence of a prioritized training plan based on the needs analysis.	√ Yes	□ No	
5	Evidence that the Chief of Police and the command staff support the plan and are committed to strengthening the content, quality, and timeliness of training.	√ Yes	□ No	□ N/A
6	Ongoing review/improvement loop.	√ Yes	D No	

### Administrative Issues

### **Compliance Issues**



# <u>Finding # 39:</u> The SFPD does not have a department-wide strategic plan that articulates a mission and identifies the goals and objectives necessary to deliver overall policing services.

**Recommendation # 39.4** A training needs analysis must be conducted to support the training requirements recommended in this assessment. The SFPD must conduct an analysis of the needs across the organization, identify the benchmark for training, and develop a prioritized training plan based on the needs analysis. This will require solid support from the Office of the Chief of Police and the command staff if it is to succeed in strengthening the content, quality, and timeliness of the department's training. This should be completed within nine months of the issuance of this report.

### Response Date: 12/17/2020

### **Executive Summary:**

The San Francisco Police Department ("SFPD") conducted a training needs analysis across the organization. The Training Division identified where the SFPD is now, where the SFPD needs to go, and where support from the Command Staff is needed to address the training gaps identified, not only in the five areas under review of the SFPD/DOJ Collaborative Reform Initiative Report ("CRI"), but across the organization. As a result of this process, the Training Division authored a Unit Order to designate the Professional Development Unit to deconflict training and act as clearinghouse for future training development. Through this process, the Professional Standards and Principled Policing Bureau ("PSPP") and the Training Division have actively reviewed the work product of the Project Managers and Executive Sponsor and/or Working Groups to fill training gaps based on training needs identified through:

- 1) Recommendations assigned to the SFPD Police Academy
- Recommendations not assigned to the Academy, but which required a training component because of their (Project Manager's, Executive Sponsor's and/or Working Group's) own training needs analysis.
- 3) Training needs analyses occurring outside the review of the CRI.

With respect to #1 and #2 (above), the process through which we closed, and continue to close, the identified training needs analysis gaps, was and will continue to be through a review of the work product including updated DGOs, new DBs, and multiple Unit Orders, where roll call trainings, training videos, current class modifications, and the development of new classes were done across all five areas of this report. The following are representative examples of a few recommendations, where a training needs analysis was conducted as a result of this report, in each of the five areas of review:



Areas of Review	<b>Recommendation Numbers</b>
Use of Force	6.2, 6.3, 9.2, 18.2
Bias	27.5, 27.7, 28.3, 36.3
Community Policing	41.2, 45.3, 49.3, 50.1, 51.2
Accountability	57.1, 70.3, 73.1, 74.1
Recruitment	88.3, 85.1, 92.1, 92.2

These are just a small sampling of the larger effort conducted by PSPP and the Training Division, but they prove the process between the PSPP and the Training Division is sound, effective, and will continue until all training needs analyses are addressed from this report.

In addition to training needs analyses done under this report, the SFPD discovered multiple training needs analyses already conducted across various units, throughout the entire department, outside the review of the DOJ CRI. This is currently done by formal boards and panels (such as the Disciplinary Review Board, the Firearm Discharge Review Board, the Collision Board of Review, etc.), in collaboration with civilian oversight findings and recommendations of the Department of Police Accountability (See CRITA DOJ Recommendation 74.2). The training needs analyses are then extrapolated into individual and/or department training plans that reflect actual incidents, trends, and internal/external stakeholder insights.

The Academy and its various units are responsible for conducting training needs analyses and finding opportunities for training enhancement from such analyses. The Academy collaborates using both inputs and outputs, from internal and external stakeholders, to establish clear and timely training for the members. The Academy's Professional Development Unit now acts as a "clearinghouse" for analyses and training-gap coordination, while simultaneously fostering an open line of communication to all ranks, bureaus, and personnel. This allows for rapid feedback and suggestions on training needs.

One recent, strong training needs analysis was done in conjunction with California state mandated training. Within the past two months, the SFPD's Training Division created an innovative training plan, which continually assess training needs. In the past, the primary method of training SFPD in-service personnel consisted of mandated attendance on a two-year Advanced Officer/Continual Professional Training (AO/CPT) schedule. While this training met the minimum California Peace Officers Standards and Training Commission (P.O.S.T.) state law mandates, it left and still leaves very little flexibility in the training plan. AO/CPT class cycles were set for a two-year period. AO/CPT Instructors must present each class with the same content, every time, for the two-year cycle. Although it ensured compliance with the minimum standards, it did little to inspire officers, or create new meaningful training opportunities. The AO/CPT two-year cycle also left the SFPD unable to pivot and roll out training rapidly in response to changes in the community and police procedure.



The SFPD Chief and Command Staff took a very pioneering and practical approach to fix this problem. After years of discussion, the SFPD changed the patrol deployment from the watch off schedule, to a platooning schedule. This Command Staff level change allowed a full scheduled training day for half the patrol force every two weeks, or 20 hours of training per month. Now, the SFPD is untethered from the traditional two-year AO/CPT cycle, as the primary means of training. This allows the AO/CPT course to fulfill P.O.S.T./State Law mandates, while allowing the SFPD to control its training and rapidly respond to changes in the police procedure and emerging political or community concerns.

The newly implemented training plan is on the forefront of innovation and builds training time into the schedule. The new training plan allows members of the SFPD to choose elective training that interests the member above and beyond mandates. This monumental shift in training philosophy, into a more collegiate atmosphere, will lead to a well-trained police department with the most current training possible.

All the actions resulting from the training needs analyses will ultimately enhance the formal authority and influential legitimacy of the Academy in the following ways:

- 1) The Academy's role recognizes and connects with internal and external stakeholders to transform changes in law and policy into training.
- 2) The Academy then delivers training that reflects the work product created by this report and the work product generated by formal boards and panels.
- 3) The SFPD's relentless empowering of all employees to identify gaps and recommend fixes to the Department's training curricula.

### **Compliance Measures:**

- 1) Evidence that the department has conducted a training needs analysis across the organization that supports the training requirements recommended in this report.
- I. Training Needs Analysis Conducted as a Result of the DOJ Collaborative Reform Initiative Report

The SFPD conducted many training needs analyses as a result of the DOJ Collaborative Reform Initiative. Some of these recommendations were assigned to the SFPD Academy, while others were outside the Academy, but nonetheless had a training component. Three major examples of the implementation are:

A. DOJ Recommendation 74.1 Implementation

DOJ Recommendation 74.1 stated:



"The SFPD should conduct a thorough and structured approach when creating new policies and procedures via Department Bulletins."

This recommendation was the catalyst for Professional Standards and Principled Policing (PSPP) Unit Order 20-03: Consideration of Policy Implementation Support Factors as Part of the Policy Development Process. The Unit Order ensures that policy support options, such as: Training, Creating or Updating Forms, Software/IT Updates, Advisement to the Public, Equipment or Supplies, etc, are all considered during the concurrence process and before policy implementation. (See Attachment #1 – PSPP Unit Order 20-03)

The PSPP created SFPD Form 577: Policy Implementation Checklist, to monitor and track the process. The form identifies the Subject Matter Expert, the Name of the Policy, and what support options are needed. This simplified process requires the potential training needs to be analyzed at the policy creation level, ensuring the policy will not be rolled out without proper support. This new structured approach ensures proper training is conducted and is a direct result of following recommendation 74.1 and ensuring substantial compliance with the Collaborative Reform Initiative. (See Attachment #2 – SFPD Form 577: Policy Implementation Checklist)

B. DOJ Recommendation 51.2 Implementation

DOJ Recommendation 51.2 stated:

"The SFPD should engage in peer-to-peer training exchanges for exposure to other department's training curricula to identify areas for potential improvement. Areas of focus should include de-escalation training, use of force training with a focus on the sanctity of life, impartial policing, and procedural justice."

Since this recommendation was published, the SFPD has multiple peer-to-peer exchanges to find potential improvement. In 2017, the SFPD conducted a peer-to-peer training exchange, which had a significant impact on "Community Immersions" held during the Basic Recruit Course. In order to ensure that police trainees have the right mindset and experience to justly engage with all communities in San Francisco, SFPD Academy Staff and the SFPD's Community Engagement Division developed a series of in-person, in neighborhood, and community immersions. One such immersion was entitled, "LGBQI Immersion Day," which was a collaborative effort by members of the Police Department, Police Commission, Human Rights Commission, businesses, community groups, and residents. The event's itinerary and execution were a success and there was tremendous feedback from participants. (See Attachment #3 – LGBTQI Immersion Day Course Information and Sampling of Evaluations)

In light of this program's success, a member from the Austin Police Training Academy – Continuing Education Team conducted a peer-to-peer training exchange with SFPD Officer Brody Elton on how to build, collaborate on, and deliver a community immersion. As a result of this exchange, the SFPD collaborated and attended Austin Police Department's



*Fair and Impartial Policing* course, to evaluate and find the best practices for training methods and content. (See Attachment #4 – Letter from Austin Police Department Confirming Officer Elton's Attendance in their *Fair and Impartial Policing* course)

### C. DOJ Recommendation 41.2 Implementation

DOJ Recommendation 41.2 stated:

"The SFPD should work with the Police Commission to draft a new community policing order that reflects the priorities, goals, and actions of the department."

Because of Recommendation 41.2, the SFPD and the Police Commission adopted a new Department General Order 1.08: Community Policing. Under the new DGO 1.08 the SFPD is mandated to conduct two hours of training for department members, every two years. (See Attachment #5 – DGO 1.08)

As will be discussed below, this mandated training is now being developed by the SFPD Training Division and will be presented as roll call training for members over the next two years. This is another example of the SFPD conducting training needs analyses across the department and implementing the findings yielded from this report.

The above three are a representative sample of Recommendations yielded from this report, conducting a training needs analysis, and then implementing the new training based on the recommendation. In addition to the above discussed examples, DOJ Recommendations 6.3, 9.1, 9.2, 9.3, and 9.4, among many others in progress, all created training needs analyses that were completed and implemented. Now, that the California Department of Justice found them to be in substantial compliance, ensures that the SFPD is conducting training needs analyses and implementing the findings. (See DOJ Recommendations Listed Above)

II. Training Needs Analysis Conducted Across the Organization Outside of CRI Review

The SFPD Training Plan includes conducting multiple training needs analyses over many different units. The SFPD has many built in formal processes to analyze training needs and determine future training goals. In addition to the formal training needs analyses, supervisors and officers are encouraged to conduct training analyses contemporaneous with an incident. This informal process, built into the unit's operations, allows immediate implementation of training needs to cure minor deficiencies that may not rise to the level of department wide training needs. The SFPD numerous formal training analyses across the department include:

A. San Francisco Police Academy



The SFPD Police Academy is the primary unit responsible for training both new recruits, inservice personnel, and civilian professional staff. The SFPD Academy is composed of the following units that conduct almost all formalized training:

- Regular Basic Course
- Professional Development Unit (PDU)
- SFPD Range
- Emergency Vehicle Operations Course (EVOC)
- Report Writing Unit
- Physical Training/Defense Tactics Unit (PT/DT)
- Field Tactics/Force Options Office (FTFO)
- Field Training Officers Office (FTO Office)

The Regular Basic Course consists of newly hired San Francisco Police Recruit Officers. The class spans 32 weeks and covers P.O.S.T. mandated Learning Domains, SFPD mandates, and community groups to expose recruits to differing perspectives. During training, the recruits will also attend courses at the SFPD Range, EVOC, Report Writing, PT/DT, and after graduation, the FTO Office. The Recruit Training Office (RTO) creates the course curriculum. Prior to the start of a new class, the RTO and a Training Division conduct a training needs analysis. They compile P.O.S.T. mandates, previous class surveys from the above units, and input from Command Staff to create the next class training course schedule. The Captain of the Training Division then signs off the schedule and implements it for the next Academy class.

PDU is located in the Academy facility. The PDU is responsible for the continued education, training, and professional development of Department members. To accomplish these tasks, the PDU conducts specific, verifiable, and on-going peer-to-peer training curricula exchanges. The PDU conducts these exchanges with our peers both inside and outside the policing profession. As will be discussed below, a new unit order was generated to make the PDU a clearinghouse for training. The subsequent Department Notice will make the PDU responsibilities known department wide. (See Attachment #6 – Training Division Unit Order 20-01)

B. Advanced Officer/Continuing Professional Training (AO/CPT)

The AO/CPT course is held weekly at the SFPD Police Academy. California P.O.S.T. mandates AO/CPT and SFPD members are required to attend once every two-year cycle based on their SFPD Star number. Probationary members are required to attend immediately upon completion of their probationary period and then follow the next two-year cycle as required. Each SFPD member is responsible for scheduling the class through their Training Coordinator. Additionally, members are responsible for completing AO/CPT during their assigned training period.



The AO/CPT course consists of 40 hours of training: including classroom instruction and hands-on skills testing. P.O.S.T. mandated classes include Perishable Skills, Force Options Training, EVOC, Interpersonal/Tactical Communications, and Arrest and Control Techniques. The officer must attend these courses during the two-year cycle, and the SFPD cannot change or waive this requirement. (See Attachment #7 – DB 18-260)

Prior to the 2021-2022 AO/CPT Training Cycle, AO/CPT was the primary method of training SFPD in-service personnel. The training met the minimum California Peace Officers Standards and Training Commission (P.O.S.T.) state law mandates; however, it left little flexibility in the training plan. AO/CPT class cycles were set for a two-year period. AO/CPT Instructors must present each class with the same content, every time, for the two-year cycle. While it ensured compliance with the minimum standards mandated by P.O.S.T., it did little to inspire officers, or create new meaningful training opportunities. The AO/CPT two-year cycle also left the SFPD unable to pivot and roll out training rapidly in response to changes in the community and police procedure.

The AO/CPT 40 hours of courses were determined by a training needs analysis conducted by the Training Division in the Professional Development Unit (PDU). The PDU would compile post attendance class surveys from prior AO/CPT classes, new/existing state mandates, department mandates, and input from the Command Staff to create a curriculum for the next AO/CPT cycle. (See Attachment #8 – Training Division Unit Order 20-02)

Starting in the 2021-2022, the SFPD is changing the structure of its AO/CPT course, to fit in with the platoon schedule, and allow for immediate response to emerging training needs. The new structural change is discussed at length below, in Compliance Measure #4 Section II: AO/CPT Structure Change.

C. Discipline Review Board (DRB)

DGO 2.04 created a Discipline Review Board (DRB). The DRB meets quarterly and consists of SFPD Command Staff, a member of the Police Commission, and the Director of the Department of Police Accountability (DPA). The DRB is tasked with aggregating trends related to DPA and Internal Affairs complaints, both sustained and not sustained. The DRB reviews policy failure or training failure cases and selects sustained cases from the previous quarter to determine the need for training or policy changes. The DRB shall:

"Consider whether any policy, procedures or training needs to be revised, added or re-issued if it relates to the subject matter reviewed. The DRB may make written recommendations that include the manner in which the recommendation shall be implemented and a timeline for completion based upon identified priority level and complexity of recommendation.

The DRB shall report quarterly to the public and to the Commission those policy and training changes it recommends, and the measurement of the success or failure of each change, in a manner consistent with individual police officer privacy rights."



The DRB's report is part of a training needs analysis on emerging trends that cause disciplinary issues. The SFPD uses this report as a tool to discover deficiencies in training and develop training to rectify the found concerns. (See Attachment #9 – DGO 2.04)

D. Collision Board of Review (CBOR)

DGO 3.07 governs the Collision Board of Review (CBOR), formerly the Department Accident Board of Review (DABOR). CBOR reviews all member-involved collisions, reportable under DGO 2.06. CBOR also "determines the causative factors, compliance with Department policies and procedures, and recommend disciplinary action." CBOR conducts a hearing with the involved parties and then makes a determination based on their findings.

A member of the Emergency Vehicle Operations (EVOC) Unit is a non-voting member of the CBOR panel. CBOR communicates their findings to the EVOC Unit to conduct or develop training for emerging needs or found training deficiencies. These training changes are then implemented in future recruit training courses, EVOC refresher courses for inservice personnel, or amending policy. (See Attachment #10 – DGO 3.07)

E. Firearm Discharge Review Board (FDRB)

DGO 3.10 outlines the functions and responsibilities of the FDRB. The SFPD reviews every instance where a firearm is discharged, regardless of if it results in an injury or death. The purpose of the FDRB is "to ensure that the department is continually reviewing its training, policy and procedures in light of the circumstances that lead to firearm discharges by members and to determine if the discharge was in policy." (See Attachment #11 – DGO 3.10)

In addition to the FDRB generating a report on the incident, DB 19-100 created the Field Tactics/Force Options office in the Training Division. The purpose of the FTFO is to:

"Provide training oversight, consistency, and guidance with respect to the application of field tactics and force options by sworn members during encounters with suspects. The intent is to review and provide instruction to members to ensure officers are better prepared to face the challenges confronting them. It is also intended to reinforce and enhance officers' basic tactical knowledge, skills and abilities."

The FTFO conducts their own, a non-punitive, inquiry regarding tactics used in the incident. The FTFO independently analyzes the incident and a generates a report to the FDRB that includes recommendations for new or updated training that should be conducted based on their review. (See Attachment #12 – DB 19-100)

An example of this system in action is OIS#18-005. The FTFO was able to analyze the incident and recognize a training need. The FTFO then authored DB#19-224:



Communications Priorities, which addressed a tactical element that they believed patrol officers should recognize in the future. This system of FDRB and FTFO working in conjunction to analyze training needs, allows for continued professional development and improvement in officer safety. (See Attachment #13 – DB 19-224)

F. In Custody Death Review Board (ICDRB)

DGO 8.12 created the ICDRB to review every in-custody death. The purpose of the ICDRB is to "determine if the SFPD members acted reasonably within policy at the time of the incustody death and evaluate the Department's training, policies and procedures in light of circumstances that led to the in-custody death." In addition, 8.12F.7 states that the ICDRB written summary shall include recommendations for:

"b. The need to develop new policy where none existed at the time of the incident.

c. The need to develop new training and techniques to improve department performance."

The ICDRB by policy conducts its own training analysis, in the written summary, and presents its findings to the Chief of Police for implementation if needed. (See Attachment #14 – DGO 8.12)

G. Early Intervention System (EIS)

DGO 3.19 created the EIS program. EIS is a non-disciplinary system designed to improve the performance of the Department and its members through coaching, training and types of professional development. The EIS involves a two-step approach. The EIS Unit, and a member's supervisor during their daily review, conduct an initial review of all members who exceed the stated thresholds. Supervisors may conclude that a pattern of at-risk behavior does not exist and forward their finding to the EIS Unit through their commanding officer. The EIS Unit may concur that a pattern of at-risk behavior does not exist and that corrective action is not necessary.

Conversely, the EIS Unit may not concur with the supervisor's finding that a pattern of atrisk behavior does not exist; the EIS Unit will electronically return the name(s) of the member(s) to the respective commanding officer, who shall ensure that the member's supervisor engages in a performance review and, if appropriate, initiate intervention with the member. Further, the commanding officer shall ensure that the supervisor electronically transmits a report within 21 days to the EIS Unit, indicating what type of intervention has taken place. The supervisor shall continue to monitor the member's performance after the intervention has taken place, and transmit a follow-up report at three months and at one year after the initial intervention.

The EIS Board is an advisory panel that is required to meet quarterly. The EIS Board shall "Review new trends and thresholds as recommended by the EIS administrative staff" and



"Recommend changes of relevant policies to the Police Commission. The EIS Board recommendations constitute a training needs analysis that can be communicated to the appropriate division for future training development. (See Attachment #15 – DGO 3.19)

### H. Department of Police Accountability (DPA)

In addition to the internal mechanisms in place to analyze training needs, the Department of Police Accountability (DPA) can also analyze for training needs. The mission of the DPA is to promptly, fairly, and impartially investigate complaints against San Francisco police officers, make policy recommendations regarding police practices and conduct periodic audits of the San Francisco Police Department. Civilians who have never been police officers in San Francisco staff the Department of Police Accountability.

The DPA Investigator completes an investigation and then, in conjunction with DPA Investigative Staff and DPA Attorneys, submit their preliminary findings on the matter. The potential findings include a "Training Failure" or "Policy Failure." These represent DPA's analysis of a Training or Policy Need. Counsel for the DPA communicates these findings to the Captain of the Police Academy. The Captain takes the findings and can choose how to best implement the finding and cure any deficiency in training, which could include referring the issue to the Professional Development Unit. (Revisit Attachment #9 – DGO 2.04)

In addition to those findings communicated to the Captain of the Police Academy, the DPA issues an Annual Report with summaries of investigated complaints and any subsequent discipline rendered. This is a valuable source to analyze and discover any trends or training needs. These found trends are aggregated and the communicated to the DRB, as discussed above in Section III: Discipline Review Board.

### 2) The needs analysis completed by July 12, 2017.

The SFPD has continued to conduct multiple training needs analyses across various units of the entire department, as evidenced in Compliance Measure 1. However, due to a number of factors, including the change from the United States Department of Justice to the California Department of Justice in 2017, the formal needs analysis was not completed by the July 12, 2017 date.

## 3) Evidence the department identified benchmarks for training to support development of the needs analysis.

I. Crisis Intervention Training (CIT)

In response to multiple incidents across the country and within the department, the SFPD reevaluated training and police response to incidents of people in crisis. In 2016, the SFPD identified Crisis Intervention and De-Escalation Training as a benchmark for training,



culminating in the new DGO 5.21. This new updated policy's purpose is "to develop, implement and incorporate the CIT program within the district stations daily operations." This includes, "preparing members to respond to persons in crisis incidents and, as a team, formulate a plan, establish rapport, and use de-escalation tactics (including tactical repositioning and creating time and distance), whenever possible." All of this to meet the ultimate goal of, "to safely resolve person in crisis incidents without the use of force, whenever possible, and to refer persons in crisis to community mental health service providers or other resources, as appropriate." The DGO provides delineated and defined roles of the officers on scene. It also provides guidance for dealing with persons in mental health crisis, and the responsibilities of the responding officers.

Section VI of DGO 5.21 specifies the necessity for CIT Training as a benchmark. It states:

"The Department will provide ongoing Peace Officer Standards & Training (POST) certified courses on Crisis Intervention or other similar training on crisis deescalation, signs and symptoms of mental illnesses, recognizing persons in crisis, and team response concepts for all officers."

In addition to the mandate of CIT, or similarly developed courses, for all officers, the DGO also describes the method the training will occur:

"The CIT Coordinator will develop and assist the Training Division in facilitating the CIT training curriculum in the following courses: Introductory, Advanced, roll call, Advanced Officer/Continuing Professional Training and Field Training Officer (FTO) programs."

This provided the SFPD with direction on the future of this training benchmark and building on the successes the program has yielded thus far. (See Attachment #16 – DGO 5.21)

In 2020, Chief Scott issued DN 20-157: Crisis Intervention Team (CIT) Response to Person in Crisis Calls *Service Refresher*, to reiterate the importance of the CIT Program and remind officers in the field about their responsibilities under DGO 5.21. This continued reminder to SFPD members further acknowledges the importance of the CIT Program and status as a benchmark of SFPD training. (See Attachment #17 – DN 20-157)

II. Use of Force Training for New DGO 5.01

In December 2016, the Police Commission adopted a new Use of Force Policy in DGO 5.01. The policy significantly changed the old DGO 5.01 and became effective immediately. The SFPD immediately identified this as a new benchmark training need in order to ensure officers complied with the new policy.

Sgt. Steven Pomatto of the PT/DT unit at the SFPD Academy created a class to address this need. In collaboration with the CIT Unit, Sgt. Pomatto created a 2 day, 20 hour course that covered both the new DGO 5.01 and the CIT Teams Response to calls. One day



included an in depth review of the new DGO 5.01. The second day CIT Unit Members presented an overview of the team concept when responding to calls of persons in crisis. The SFPD conducted this training until the whole department had completed the course as mandated by the Police Commission. This course met two newly created SFPD training benchmarks and has now incorporated it into the recruit training curriculum. (See Attachment #18 – DGO 5.01 ECO 20 Hour Course)

### 4) Evidence of a prioritized training plan based on the needs analysis.

I. Moving Away from the Watch Off to Platooning Schedule

For years, the SFPD discussed potentially changing the patrol deployment schedule from the watch off schedule to the platooning model. The onset of the COVID-19 pandemic necessitated a change in schedule to limit the potential spread of the virus to whole police stations. When constructing the new platoon schedule, the SFPD decided the overlap day would be utilized as a training day, ensuring two full training days per month for each officer. The creation of a bi-monthly Training Day, not only allows for opportunities built into officer's schedules, but also shows the SFPD is committed to prioritizing training for its members. (See Attachment #19 – Training Day Platoon Schedule)

II. AO/CPT Structure Change

Starting in the 2021-2022, the SFPD is changing the structure of its AO/CPT course, to fit in with the platoon schedule. This structural change allows for immediate response to emerging training needs. Since AO/CPT will focus solely on state law mandated training, the training Wednesdays can be utilized to offer innovative training as needs emerge.

Members can chose elective courses to fulfill both department and personal goals. The training is responsive to feedback and real time needs. The change offers the opportunity for even the newest officers to control their own training and professional development. (See Attachment #20 – Proposed AO/CPT Schedule for 2021/2022)

III. PDU Course Evaluations

At the conclusion of every course, a short survey is offered to the attendee. The attendee completes the survey and the results are sent to PDU. The PDU office uses the information yielded from these surveys to make changes to future offerings. The PDU office can inform the presenter of feedback, determine the usefulness of the course, redevelop the training, or remove the offering if no longer relevant. The PDU Course Evaluations allow the PDU Office to continually revise training based on the training needs analysis conducted during evaluations review. (Revisit Attachment #8 – PDU Unit Order 20-02)

IV. Expansion and Revision of the Crisis Intervention Team Unit (DGO 5.21)



As discussed in Compliance Measure #3, Crisis Intervention Training was identified as a benchmark of SFPD Training. The CIT Policy and Revision are a great example of the SFPD conducting a training needs analysis and then executing a training plan to fix a deficiency. (Revisit Attachment #16 – DGO 5.21)

### V. Prone Handcuffing Video

In June of 2020, a video was posted on Facebook showing a San Francisco Police Officer appearing to place her knee on the neck of a 19-year-old African American male. The video was from January 2020 incident, but given new attention after the death of George Floyd in Minneapolis. The local news media immediately picked up the story and it spread. The SFPD was immediately the focus of attention and needed to respond.

The SFPD took action and evaluated the incident. The PT/DT Staff at the Academy conducted a training needs analysis based on the tactics used in the video, statements of the involved officers, and their training methods. The PT/DT Staff coordinated with the Video Production Unit to create a Prone Handcuffing Video. The video displays tactics and the best way to deal with a prone subject. The video goes over the best way to handcuff a prone person, taking care to avoid applying pressure to the neck and head area.

This training needs analysis was brought about by an outside force and required immediate response. The SFPD then immediately created new training to address the discovered training need. (See Attachment #21 – DGO 5.01 Working Group Minutes from 10/2/20)

VI. Election Crowd Control Training

In the summer of 2020, civil unrest, protests, and even rioting occurred all over the United States. Demonstrations and rallies, planned or unplanned, occurred daily in San Francisco. These incidents tested the patrol force and specifically the SFPD knowledge of crowd control training and procedures.

In the lead up to the 2020 Presidential Election, many in San Francisco prepared for civil unrest. The SFPD also took the potential unrest seriously. In the weeks of protests over the summer, Assistant Chief Redmond conducted his own training needs analysis. Assistant Chief Redmond observed the need for a Crowd Control Class to prepare officers for potential civil unrest, and then identified the Tactical Division as the unit to conduct the training. The Tactical Division created a refresher course to meet the need. The Tactical Division found the Cow Palace as a training venue, and set up administrative staff to log participants; attendance sheets were forwarded to the Academy's Professional Development Unit for entry into the HRMS training profiles for all members that attended.

All units were scheduled to take the course on their respective training Wednesday. The Tactical Division delivered the course throughout the month of October on every Wednesday, and trained all personnel prior to the November 3<sup>rd</sup> election. This type of immediate and specific, responsive training would not have been possible, without



enormous patrol operation disruption, prior to the newly implemented platoon schedule. (See Attachment #22 – Email from Tactical Unit regarding Crowd Control Training)

### VII. Police Commission Adoption of DGO 1.08 Community Policing

As an example of the new SFPD Training Plan prioritizing based on the needs analysis, which is currently in progress, the San Francisco Police Commission adopted a new Department General Order 1.08: Community Policing. This new policy mandates the SFPD conduct two hours of training for department members every two years. Under the traditional every two year AO/CPT cycle, this training would be placed the class in AO/CPT. However, this would create a new training need to be implemented while already having an in progress AO/CPT cycle. (See Attachment #23 – DGO 1.08 Powerpoint Presentation to the SF Police Commission)

Due to the new Training Plan, untethering most training courses from AO/CPT, and the SFPD's transition to the platoon schedule, this two-hour mandate may now be implemented immediately. The training, to be developed at the Police Academy, will be broken into four, thirty-minute sessions, totaling two hours. The Training Division will determine the most appropriate fashion to deliver the training, and may utilize the scheduled training days built into the platoon schedule, without interrupting operations. The ability for the SFPD to immediately pivot, to develop and deliver new training, as mandated, is completely innovative compared to the former SFPD training plan. (See Attachment #24 – PDU Unit Order – Community Policing Roll-Call Training)

## 5) Evidence that the Chief of Police and the command staff support the plan and are committed to strengthening the content, quality, and the timeliness of training.

The Chief of Police and the Command Staff have supported the plan and helped increase its quality and timeliness of training. The Chief and Command Staff have supported the creation of the Leadership Development Institute, instituted the platoon schedule to prioritize training, and peer reviewed our current programs to ensure excellence amongst the law enforcement community.

### I. Leadership Development Institute

The SFPD collaborated with Blue Courage to create the Leadership Development Institute (LDI) in 2018. The LDI is a series of 4-8 hour sessions that offers essential topics taught one day a month over 12 months. These bite-sized classes are highly effective to ensure that learning is reinforced over time and is not taxing on the time committed to training. The LDI allows organizations to reach a wide range of team members for short amounts of time, making training more feasible, practical and effective. Participants touch on various topics each month (self-development, building high-functioning teams, courage to lead, and practical application of high-trust problem solving), which gives them a chance to put into practice lessons learned from New York Times best-selling authors such as Don Yaeger, Simon Sinek, Steven Kottler, and other experts such as cultural anthropologists, TED Talks



alumni, and meditation gurus, while still allowing them to give attention to their daily responsibilities.

The LDI fulfills the goal of "continuous improvement through life-long learning" by providing access to today's thought leaders to LDI participants who are from all ranks, bureaus, sworn/non-sworn, to these subject matter experts in various areas essential for optimal performance and readiness. Blue Courage and SFPD leadership collaborate to create the courses. Blue Courage provides subject matter experts to facilitate every session. This shorter learning model, coupled with resource material and pre-work, provides participants with the opportunity to learn without impeding their already busy lives. It also encourages a culture of continuous learning and development.

Topic areas included in The Leadership Development Institute:

Leadership vs Management	The Science of Resilience
<ul> <li>Building High Performance Teams</li> </ul>	<ul> <li>Developing Self-Mastery</li> </ul>
<ul> <li>Trust as a Foundation of Leadership</li> </ul>	<ul> <li>Role of Continuous Learning to Leadership</li> </ul>
<ul> <li>Respect and How We View</li> <li>Ourselves and Others</li> </ul>	Understanding Culture
Simon Sinek's Infinite Game	<ul> <li>Practical Application of Learning to the Agency</li> </ul>
David Covey's Leadership Traps	Capstone Project

Mindfulness

The SFPD dedicates a considerable amount of effort and cost to conduct the LDI. The cost of attendance per member is \$5000. However, the SFPD has committed to this endeavor and funded Cohort #3, for which it is now taking applications. The Chief of Police and Command Staff's continued support for the LDI, shows they are committed to strengthening the content, quality, and timeliness of training. (See Attachment #25 – DB 19-191 and 20-146 for LDI Cohort 2 and 3 Information)

II. Instituting the Platoon Schedule to Prioritize Training

As discussed at length above in Compliance Measure #4, beginning in September of 2020, the SFPD Chief and Command Staff chose to change the patrol work schedule. This changed patrol deployment from a watch off schedule, to a platoon format schedule. The new schedule produces an overlap of all personnel on Wednesdays. This overlap day has been designated a "Training Day" for half of the personnel who work based on if they are designated off Monday/Tuesday or Thursday/Friday. Effectively, because of the new



schedule, all department patrol members now have 20 hours of training built into their schedule. The Police Academy created multiple classes for Training Wednesdays and more are in the process of development for both remote/online and in person delivery. This allows officers easy access to training without rearranging officer's schedules.

The SFPD's commitment to training by the Chief and the Command Staff will ensure members are better prepared to deal with challenges in their occupation and will increase everyone's professional development. (Revisit Attachment #19 – Platoon Schedule)

III. Peer Review of New Department Training Offerings

Peer review is the process of evaluating scientific, academic, or professional work by others working in the same field. The only way to ensure the quality of a new policy or procedure is to test it against other available alternatives or having other professionals evaluate it.

The Chief and the Command Staff supported three presentations on SFPD policy, procedure, and training to the International Association of Chiefs of Police (IACP). The submission of presentations to the IACP screening committee is a competitive one, where only the most innovative, timely, and dynamic presentations are accepted. During and after the course presentation, peer-to-peer training exchanged occur as our presentations and courses are stress tested with hundreds of attendees. From there, offline peer-to-peer exchanges occur.

The three SFPD presentations, all related to subject matter covered in this Collaborative Reform Initiative, are:

- Leadership: Readiness Grace Legacy (2019)
- Beyond Crisis Intervention: San Francisco Police Department & St. Paul Police Department (2019)
- Critical Mindset Coordinated Response: A Vital Step to Reduce Police Shootings (2020)

In the "Leadership" Presentation, the SFPD collaborated with leadership education peers in Blue Courage to bring these key leadership principles to life in the hearts and minds of formal and informal leaders who must bring impartial policing, sanctity of life, and procedural justice into practical life. In the "Beyond Crisis Intervention" Presentation, SFPD Commander Daryl Fong, Lieutenant Mario Molina, and Officer Lily Prillinger collaborated with their peers in the St. Paul (Minnesota) Police Department and did a joint presentation on de-escalation best practices. The "Critical Mindset" Presentation featured peer-to-peer training collaboration between patrol and advanced tactics (SWAT) teams, as well as incorporating best practices from external organizations, including Lateral SFPD members. (See Attachment #26 – Leadership: Readiness – Grace – Legacy (2019)) (See Attachment #27 –Beyond Crisis Intervention (2019))



These are three examples of the Chief of Police and the Command Staff supporting peer review of SFPD created initiatives to ensure the quality of training content.

### IV. Chief's Office of Innovation Form

In 2018, the SFPD issued DB #18-208 creating the Chief's Office of Innovation. The Chief's Office of Innovation administers and manages the SFPD Employee Suggestion Program. The purpose of this program is to create a centralized place where employees could provide direct feedback on topics that are "cost saving, practical, constructive, and beneficial to SFPD." The DB created SFPD Form 590 "SFPD Employee Suggestion Program" which includes a "Training/Employee Development" box.

Any employee, sworn or non-sworn, could submit a request for training or suggest any discovered training shortfall to the Chief's Office of Innovation. Once received, the Chief's Office of Innovation would forward the request to the appropriate unit for development. This program allows training to be discovered, or implemented, starting with ideas from anyone in the department. The Chief created this program through the Department Bulletin and staffed a contact person to ensure it is supported. (See Attachment #29 – DB 18-208)

### 6) Ongoing review/improvement loop.

The SFPD's Training Plan is multifaceted and includes multiple, ongoing, scheduled reviews and an improvement loop. As discussed in Compliance Measure #1, the SFPD by policy has multiple boards that conduct formalized training needs analyses incorporated into their responsibilities. These formal reviews are typically conducted as a result of an incident, such as an officer involved shooting or a vehicle collision. Boards like the DRB, FDRB, ICDRB, CBOR, EIS, and DPA are the formal ongoing review mechanisms that are all in place via SFPD Department General Order, or City Charter for the DPA. The above formal processes are built into the department, primarily to deal with incidents in a reactive manner. Once an incident occurs, the panels will assess the incident and analyze for any training needs distilled from the evaluation.

In addition to the built-in processes, that reactively conduct training needs analyses, the SFPD has conducted training needs analyses are a result of the DOJ Collaborative Reform Initiative and implemented changes based on the findings. The SFPD also proactively solicits feedback and conducts training needs analyses. That information can then be developed into new training to improve performance before an incident causes a mandate.

### I. Chief's Office of Innovation (Form 590)

As discussed in Compliance Measure #5 Section IV: Chief's Office of Innovation, in 2018, the SFPD created the Chief's Office of Innovation. This program created a centralized place where employees could provide direct feedback on topics including "Training/Employee Development."



Any employee sworn or non-sworn could submit a request for training or suggest any discovered training shortfall to the Chief's Office of Innovation. Once received, the Chief's Office of Innovation would forward the request to the appropriate unit for development. This important proactive step gives employees ownership to help shape training from the ground up. Employees can conduct their own training needs analysis and notify the SFPD Command Staff of a training need that may have previously gone unnoticed. (Revisit Attachment #29 DB 18-208)

As the SFPD transitions away from the antiquated AO/CPT two-year cycle plan to the more training forward, two training days a month plan, officers will be exposed to much more training built into their schedule. As officers take more training, they may notice gaps or deficiencies in the field. The Chief's Office of Innovation SFPD form 590 allows the officer's to document these findings and submit them to be analyzed by the SFPD for future training.

II. Training Day

As discussed in Compliance Measure #5 Section II: Instituting the Platoon Schedule to Prioritize Training, the SFPD changed the patrol force from the watch off schedule to a platoon schedule. The added benefit of this change is the creation of a training day. Depending on the member's days off, they will have one training day on Wednesday, every other week. This allows every officer 20 hours of training per month built into their regular work schedule.

Currently, the Training Division sends out "Wednesday Training Day Pathways" via email to all SFPD members. These pathways include guidance and links to different training opportunities. Members can choose training that interests them or training that meets their own professional development goals. This change from the old AO/CPT mandated two-year cycle training to the more collegial training format, led by the member is revolutionary. It promotes autonomy and interest from the member and allows them to control their own development. (See Attachment #30 – Capt. Hart's Emails Regarding Training Pathways 9/20-11/20)

As the training day format continues to grow, so will the training opportunities. Many instructors are developing classes include in future training pathways. This level of innovation will ensure quality and timely future training for the SFPD.

III. Renewed Purpose and Expansion of the Professional Development Unit (PDU)

Captain Hart authored a new Unit Order for the Professional Development Unit. Once approved, this order will further expand the PDU's role as a clearinghouse for SFPD Training. The goal of this Unit order is not to centralize all training at the SFPD Academy. The purpose is to set the PDU Office as a hub for training coordination.



While the Academy conducts a bulk of SFPD Training, there are many other training opportunities, better served if conducted by experts. A prime example would be the Crowd Control Training conducted in the lead up to the 2020 Presidential Election. As previously discussed above, the Assistant Chief discovered a training need, crowd control. The Assistant Chief coordinated with the Tactical Division to conduct the training. During the training development, the Tactical Division located a proper venue and support staff to control the venue and login participants. This was a solid example of empowering the experts to construct training and achieving their objective.

The only change that would need to be made in the future is notifying the PDU of the class. Activating the PDU to coordinate the class would have allowed PDU to open a course in HRMS and log in participants. The administrative burden would be lifted from the unit conducting the training and to ensure proper documentation and training credits are provided to attendees.

To accomplish this, the new PDU unit order details the added responsibilities of the unit. The PDU unit order empowers the PDU as a clearinghouse for training. PDU will track and coordinate training requested through SFPD Form 590. The PDU would take on the administrative burden of tracking and managing training rosters for attendees. PDU will host quarterly meetings with SFPD Training Coordinators to discuss training issues and solicit ideas for future training development. PDU will maintain a list of venues that can be used to conduct training and search to find new venues or training opportunities.

A Department Notice is pending to roll out the new PDU notification procedure department wide. The DN will renew PDU's responsibilities and add the other tasks above. The DN will provide department-wide notice of the new PDU duties and set up the PDU as the training clearinghouse. (See Attachment #31 – The Professional Development Unit as a Clearinghouse for Training Needs Analyses)

### Prescreen Call Notes from 12/21/2020:

"Hillard Heintze provided context that when the recommendation was created SFPD lacked a formal structure for its training needs. As a large organization, Hillard Heintze thought that SFPD had done well with its various training needs analyses and Hillard Heintze was not expecting the Department to conduct one overarching analysis. Cal DOJ thought that the Professional Development Unit Order on the PDU acting as a clearinghouse for training needs met the intent of the recommendation. Hillard Heintze thought that SFPD could provide clearer statements that SFPD conducted needs analyses, identified where SFPD is and wants to be, and implemented trainings to get there. SFPD answered that the Crowd Control training is an example of that process and can strengthen that link in the package."

We added responsive language to the opening of the Executive Summary to address the response of Hillard Heintze:



"The San Francisco Police Department ("SFPD") conducted a training needs analysis across the organization. The Training Division identified where the SFPD is now, where the SFPD needs to go, and where support from the Command Staff is needed to address the training gaps identified, not only in the five areas under review of the SFPD/DOJ Collaborative Reform Initiative Report ("CRI"), but across the organization. As a result of this process, the Training Division authored a Unit Order to designate the Professional Development Unit to deconflict training and act as clearinghouse for future training development. Through this process, the Professional Standards and Principled Policing Bureau ("PSPP") and the Training Division have actively reviewed the work product of the Project Managers and Executive Sponsor and/or Working Groups to fill training gaps based on training needs identified through:

- 1) Recommendations assigned to the SFPD Police Academy
- 2) Recommendations not assigned to the Academy, but which required a training component because of their (Project Manager's, Executive Sponsor's and/or Working Group's) own training needs analysis.
- 3) Training needs analyses occurring outside the review of the CRI."

In addition to the above, the prescreen group reviewed and approved of the process to address the intent of this recommendation, including: The Chief provided support (Compliance Measure #5), the change from watch off to the platoon schedule, the process of developing the crowd control training, the Unit Order referenced by the DOJ Representative (Attachment #31), and the existing boards that include training needs analyses.

The PDU Unit Order establishes PDU as the clearinghouse for training that will ensure a structured approach for continued training needs analysis, This Unit Order provides continuous improvement and empowers everyone in the organization to bring forth training needs into the future.