

Recommendation 88.2

Tanya Koshy [REDACTED]

Mon 3/15/2021 1:01 PM

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Dear Acting Captain Altorfer:

Our office has completed its review of the materials related to Recommendation 88.2 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 88.2: The SFPD should evaluate why recruits are failing and develop additional training mechanisms to assist recruits in successfully completing California POST requirements.

Response to Recommendation 88.2:

SFPD has developed a quarterly process to review recruit release rates and to identify the reasons behind any trends in recruit failures that led to release from the Basic Recruit Academy. This process is detailed in the California Department of Justice's email summary finding SFPD in substantial compliance with Recommendation 88.1 (The SFPD should conduct ongoing review and analysis of release rates and their impact on diversity and identify mitigation measures to support the success of diverse candidates.).

Through this process, SFPD identified that the two primary reasons why trainees were released from the Basic Recruit Academy were that they failed either the Emergency Vehicle Operations Course (EVOC) or the Scenario Training. SFPD has implemented a series of changes to these trainings to reduce failure rates.

The changes SFPD made to EVOC to reduce release rates are described in more detail in SFPD's package from Recommendation 88.3 (The SFPD should evaluate whether orientation for recruits has positively impacted disproportionate termination rates related to Emergency Vehicle Operations Training failure. If not, the SFPD should identify other strategies to assist recruits.) In short, SFPD implemented several changes, including 1) increasing the number of training hours to 80 hours (double the California Commission on Peace Officer Standards and Training (POST) requirement of 40 hours); 2) assessing the amount of driving experience a recruit has prior to training to determine which recruits would need additional assistance; 3) providing 1-on-1 training to each recruit in any component of the course where they are identified as deficient; and 4) providing optional basic driving skills training. The changes SFPD made to the EVOC has resulted in a 47% drop in the overall number of releases based on EVOC failure.

To support the ongoing analysis of EVOC release rates, the Training Division's EVOC Unit recently issued a Unit Order (21-03). Under this Unit Order, EVOC instructors will convene at the end of each 80-hour Basic Recruit Class EVOC training to debrief and evaluate the training. The group will evaluate several components of the training, including the lecture, the testing, and remediation efforts. Information gathered during this de-brief is compiled in an After Action Report (AAR) specifically for EVOC training. The EVOC training AAR is then forwarded to the Basic Recruit Coordinator and the Academy Director for review and approval. The Academy Director is responsible for implementing any needed improvements identified during the debrief.

With respect to the Scenario Training, SFPD made several changes, including adding a new Scenario Coordinator in late 2018 and additional staff who have completed the POST Scenario Manager Course to assist the Scenario Coordinator with training. SFPD also provides more training hours (roughly 20-24 hours) than POST requires,

which provides recruits more time to practice scenarios. To improve evaluation of recruits on scenarios, the Scenario Training staff will go through each of the scenarios as if they were recruits, with evaluators present, just prior to the start of testing. Going through the scenario testing prior to testing keeps the evaluators up to date on the training provided to recruits. The changes SFPD made to the Scenario Training has resulted in a 56% drop in the overall number of releases based on Scenario Training failure.

Though not related to substantial compliance with this Recommendation, the California Department of Justice shares Hillard Heintze's concerns that SFPD is relying on a nearly four year old Unit Order (17-001) and agrees that more regular evaluation of unit orders for improvements is critical.

Based on the 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 this further. Thank you.

Tanya

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Finding # 88	Gender, racial, and ethnic minority recruits were terminated at a higher rate from recruit training than White male recruits.
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Recommendation # 88.2	The SFPD should evaluate why recruits are failing and develop additional training mechanisms to assist recruits in successfully completing California POST requirements.
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Recommendation Status	Complete	Partially Complete	In Progress
	Not Started	No Assessment	

Summary

The SFPD has done a lot of work on the issue of supporting recruits through the hiring process and in particular those mandatory training standards that have had negative impact on diverse candidates for the department.

Compliance Measure #1 – under Unit Order 17-001 the department analyzes data from recruits and how they make it through the program or are eliminated. There is evidence of recent analysis.

Compliance Measure #2 – the department provides evidence of remedial and supportive training, and better oversight of recruit progression through the program.

Compliance Measure #3 – this aligns with compliance measure #2 and the department identified how it has addressed mitigation with positive results overall. They have also added another Unit Order directly addressing emergency vehicle operations, an issue for recruit retention.

Compliance Measure #4 – the update of the unit orders, the ongoing review and work to address why recruits leave the program and the mitigation measures put into place provide evidence of completion for this measure. There is evidence of decreased failures for those areas identified in the assessment and this is a credit to the work of the department.

The SFPD is relying upon a unit order that is over three years old (2017) to drive compliance with this recommendation. There is concern that these orders become a challenge. Policy requires annual review. This review team suggests the department evaluate and implement a tracking process to ensure this occurs.

Compliance Measures	Status/Measure Met
1 Evaluation of recruit failures.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2 Identification of training support to address identified causes.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3 Implementation of mitigation procedures.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4 Continuous improvement and review loop.	√ Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Administrative Issues

Compliance Issues

The increasing reliance on Unit Orders without tracking controls is a concern. See details in Review Summary.



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Finding # 88: Gender, racial, and ethnic minority recruits were terminated at a higher rate from recruit training than white male recruits.

Recommendation # 88.2 The SFPD should evaluate why recruits are failing and develop additional training mechanisms to assist recruits in successfully completing California POST requirements.

Response Date: 01/14/21

Executive Summary: The Training Division reviews and evaluates the San Francisco Police Department's implemented regulations and POST guidelines regarding training and testing specifications for recruits. During a review of all areas of recruit testing, the Training Division determined that EVOC and Scenario Testing were consistently the two areas with the highest failure rates for recruits.

On 12/28/2020 @1030 hours, 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.

"Hillard Heintze observed that SFPD included both a 2017 unit order and a proposed unit order. Hillard Heintze was curious why this package was not held until that proposed unit order was finalized and advised that the unit order should be finalized prior to package submission."

Compliance Measures:

1. Evaluation of Recruit Failures:

As per Unit Order 17-001 (see attachment #1), the Training Division captures and analyzes identified data sets. The data sets are then reviewed by the Training Division quarterly Review Committee (see attachment #2). This analysis and review is designed to identify trends in which recruits are released from the Basic Recruit Course at the San Francisco Police Academy. A review of release factors by class data in the first quarter of 2019 by the Training Division quarterly Review Committee indicated that EVOC was a primary reason for recruit release (see attachment #3). Following the release of 9 recruits for EVOC in class 264, an initial meeting was held in the Training Division on May 15, 2019. Several memos addressing the issue and recommendations of improvements were completed and forwarded up the chain of command (see attachment #4).

EVOC Training recommendations and testing changes were implemented for academy class 265 in July 2019. A significant improvement was seen in classes 265-270 as the



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failures went from 9 in class 264 to 3 in class 265, 0 in 266L, 2 in 267, 4 in 268, 2 in 269 and 1 in 270. A review of total EVOC failures from classes 259-264 (6 classes – pre recommendations) showed a total failure number of 34 Recruits, versus failures in classes 265-270 (6 classes – post recommendations) of a total failure number of 12.

The Training Division immediately examines the EVOC program upon class completion to ensure issues can be identified and addressed expeditiously. Unit Order 21-03 (see attachment #5) outlines procedures for mandatory EVOC staff de-briefs and After Action Reports (AAR) at the conclusion of each recruit class training. All completed AARs shall be completed within 5 business days and forwarded to the Academy Coordinator and Academy Director for approval (see attachment #6). Due to the comprehensive improvement plan implemented in EVOC since class 265 (July 2019), the unit has not seen any significant issues with the EVOC training program and associated failures. Nonetheless, the data continues to be analyzed in an effort to identify areas of potential improvement.

This data shows a **47% decrease** in recruits being released for EVOC failures after implementing new EVOC recommendations.



The Training Division captures and analyzes identified data sets from Scenario testing. The data sets are reviewed by the Training Division quarterly Review Committee (see attachment #2). A review of release factors by class data in the first quarter of 2019 by



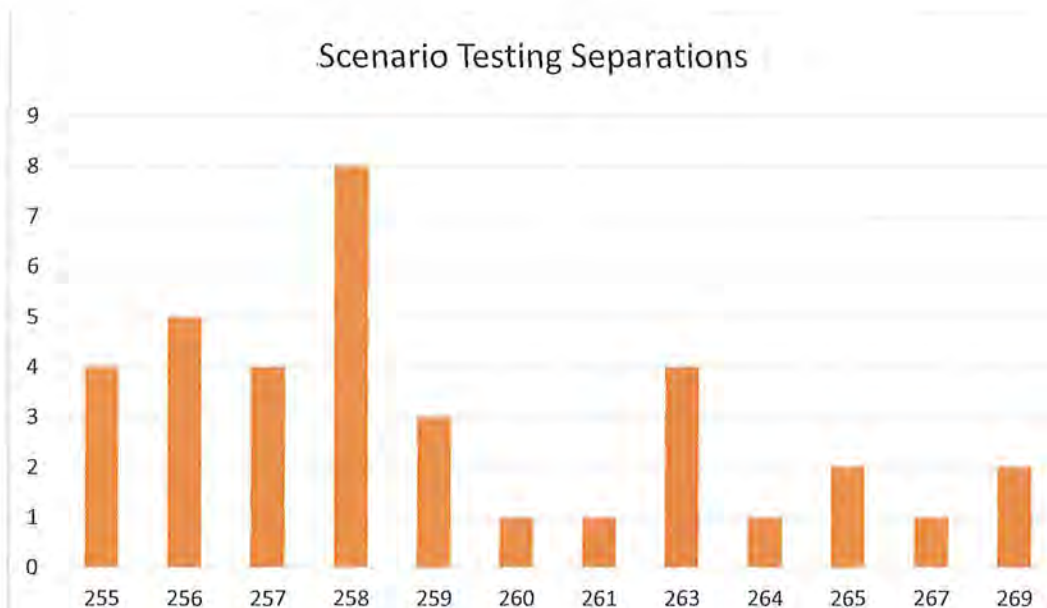
Collaborative Reform Completion Memorandum

the Training Division quarterly Review Committee indicated that Scenario Testing was another reason for recruit release.

In late 2018, a new Scenario Coordinator/Manager joined the Training Unit. The procedures for scenario demonstrations, scenario practice, and the management and training of scenario evaluators was revised with the goal to increase retention. The implementation resulted in a measurable improvement between classes 261 and 269. A review of total Scenario testing failures from classes 255, 256, 257, 258, 259, and 260 (6 classes - pre recommendations) showed a total failure number of 25 recruits, versus failures in classes 261, 263, 264, 265, 267, 268, and 269 (6 classes – post recommendations) of a total failure number of 11 recruits.

*The missing class numbers are lateral recruit classes who do not participate in Scenario testing).

This data shows a **56% decrease** in recruits being released for Scenarios failures after implementing new Scenario recommendations.



2. Identification of Training Support to Address identified Causes:

After evaluating recruit failures in EVOC, the following areas were identified as areas to offer additional training support for each recruit. This additional support aids each recruit in becoming more familiar with fleet vehicles, and the training and testing specifications provided by POST.

- Increased the hours of training



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- During orientation (Intro to EVOC, 4 hours), each recruit is given a survey to determine when they obtained their license, how many years they have been driving and their overall experience in operating a vehicle. The results of the survey help to determine which recruits will need more assistance.
- EVOC offers an optional training in basic driving skills. This is done twice for a total 16 hours (total of 100 hours of EVOC instruction).
- One on one training is given to each recruit who is deficient in an identified area (1 on 1 Remediation).

After evaluating recruit failures in Scenario testing, the following areas were identified as areas to offer additional training support for each recruit. This additional support aids each recruit in becoming more familiar with Scenario Testing. Due to a high number of failures during Scenario Testing, the Scenario Management team implemented additional practice sessions for recruits to give them additional training.

- Additional staff, who have successfully completed the POST Scenario Manager Course, have been added to assist the Training Division's Scenario Coordinator in the training/preparation of the recruits.
- In the recruit daily schedule, the SFPD provides more than the POST required hours for the Scenario demonstration. The Scenario training staff provides additional optional training sessions to the recruits to practice Scenarios after they have been demonstrated.
- To maintain the high standard already in place, training staff now complete each of the Scenarios (acting as a recruit) on the day of the test with the evaluator and role players at each site, prior to the start of the testing.

3. Implementation of Mitigation Procedures:

The following strategies have been implemented to increase recruit success during EVOC testing:

- Increased the hours of training from 64 to 80 hours (POST only requires 40 hours)
- During orientation (Intro to EVOC, 4 hours), each recruit is given a survey to determine when they obtained their license, how many years they have been driving and their overall experience in operating a vehicle. The results of the survey help to determine which recruits will need more assistance.
- In addition, EVOC offers an optional training in basic driving skills. This is done twice for a total 16 hours (total of 100 hours of EVOC instruction).
- A Basic Vehicle Operation Knowledge Test.
- One on one training is given to each recruit who is deficient in an identified area (1 on 1 Remediation).
- More time in the vehicle driving (Practice Laps)
- Tutorial videos on proper driving skills



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- A tracking log which tracks each recruit from the EVOC orientation through their 80 hour EVOC course. The tracking log is located in the recruits' binder which each recruit receives during their "Intro to EVOC".
- EVOC Safety Rules and Regulations.
- EVOC 2 week course outline
- Recruits will also have the following manuals available to them by hardcopy or over the internet
 - California Drivers Handbook
 - POST LD 19
 - POST DAI (Driver Awareness Instructor) Manual
 - POST DTI (Driver Training Instructor) Manual
 - SFPD Pursuit Policy

The following strategies have been implemented to increase recruit success during Scenario testing:

- Additional staff, who have successfully completed the POST Scenario Manager Course, have been added to assist the Training Division's Scenario Coordinator in the training/preparation of the recruits.
- In the recruit daily schedule, the SFPD provides more than the POST required hours for the Scenario demonstration. The Scenario training staff provides additional optional training sessions to the recruits to practice Scenarios after they have been demonstrated. The optional practice sessions are monitored by the Scenario Training staff and Recruit Training Staff to answer questions that recruits may have. Typically, the recruits receive approximately 20-24 hours of supervised optional practice sessions in addition to their required 19 hours mandated by POST.
- To maintain the high standard already in place, training staff now complete each of the Scenarios (acting as a recruit) on the day of the test with the evaluator and role players at each site, prior to the start of the testing. This allows the opportunity to teach or re-train some of our evaluators to keep them up-to-date on training that the recruits received prior to the testing. This process also maintains consistency among evaluators and role players.
- If a Recruit fails a scenario test, the Evaluator who failed the recruit must go over the evaluation sheet with the Recruit and explain what he/she did wrong and what they did right. The Recruit Training Officer (RTO) who will be remediating the recruit is also present. By doing this, there is less confusion for the Recruit and the RTO member, during the remediation. The Academy Coordinator or a Recruit Training Officer with the possible assistance of a Subject Matter Expert will provide remedial training. Students will be provided with the specific area(s) of deficiency on the initial test and comprehensive instruction on correct procedures. The member(s) providing remedial training will be provided the Evaluation Form from the initial failed scenario and ensure



Collaborative Reform Completion Memorandum

the student understands the proper procedures and is prepared for the retest. Students will be allowed adequate time for remedial training and study for the retest to ensure they are sufficiently prepared for the retest.

When a recruit fails a scenario test, the re-test is conducted by a separate Evaluator and Role Player. The re-test for each recruit failure is recorded. Recordings shall be created only by a designee of the Scenario Manager who has completed Attachment A and Exhibit 4 (see attachment #7). Recordings are made on an Aabeloy HDV-201LM or equivalent video camera dedicated for use by the Scenario Manager or their designee, which creates a video file on an SD memory card. The SD memory card is kept in a locked cabinet accessible only to the Scenario Manager. Recordings produced for review by the Commanding Officer of the Training Division, the Academy Director, the Academy Coordinator, or other Academy Staff members shall be transferred from the SD card to electronic media. All files on the SD card and intermediate computer files shall be immediately deleted upon production of the electronic media. The electronic media shall be secured in the locked cabinet described above. Upon completion of the review, the content of the electronic media shall be destroyed by the Scenario Manager (see attachment #8).

- Should the recruit fail the re-test, the video is reviewed in a private office by the Scenario Manager, Assistant Scenario managers, and the Academy Director.

4. Continuous Improvement and review loop

Per Unit Order 17-001, the Training Division Quarterly Review Committee continues to review and analyze release in an effort to identify mitigation measures to support the success of recruits.

It should be noted that EVOC and Scenario Testing were identified during the review of the above release data. Mitigation measures were then immediately utilized to improve the recruit passage rates.

In addition to the Training Division Quarterly Review Committee, the Basic Academy and FTO office are part of the Recruiting and Hiring Committee which meet quarterly to discuss any proposed changes necessary in recruiting, hiring and/or recruit training.

The Training Unit continues to monitor all trends in which recruits are released from the Basic Recruit Course at the San Francisco Police Academy, which include EVOC testing and Scenario Testing for Basic Recruit Classes. The Training Unit also continues to review the pass/failure data to ensure that there is no concerning increase in failures due to EVOC, Scenario testing and other POST requirements. Since the implementation of a comprehensive improvement plan for EVOC in July of 2019, no new strategies have been developed as the failure rate due to EVOC have decreased. Since the implementation of



Collaborative Reform Completion Memorandum

improvements since 2018 for Scenario testing, the failure rate has decreased. The Scenario testing team is awaiting the approval of Unit Order # 21-04 and the Scenario After Action Report form and to continue to improve Scenario practices (see attachments #9 and #10).

In addition to the quarterly meetings by The Training Division Quarterly Review Committee, the Training unit reviews the EVOC and Scenario testing data immediately after each program is complete to address any issues. Part of the data collection includes exit interviews (see attachment #11), formal de-briefs and AARs. Through analysis, the unit has not identified any other training concerns where high failure rates (as seen in past Academy classes) has reoccurred.

Additional Attachments:

Attachment #12: Learning Domain #19 Expanded Course Outline and Student Handouts.