

Monthly Progress Report

Of the Office of Inspector General



Office of the Inspector General
Oakland Police Department

455 7th Street, 9th Floor | Oakland, CA 94607 | Phone: (510) 238-3868

CONTENTS

Table of Contents

CONTENTS.....	2
INTRODUCTION	3
AUDITS, REVIEWS, and/or INSPECTIONS	4
Stop Data Analysis of Search Rates and Search Recovery Rates.....	4
Audit of Field Complaint Acceptance Process	9
Audit of Preliminary Inquiry Process	12
ADDITIONAL AUDITS, REVIEWS, AND/OR INSPECTIONS	16
Audit of Personnel Arrested, Sued and/or Served with Administrative Process.....	16
Review of Promotional Consideration Procedure.....	19
NEXT MONTH’S PLANNED REVIEWS	24

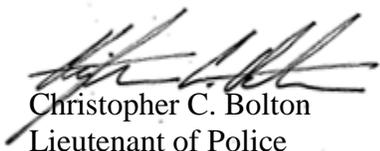
INTRODUCTION

This is the Office of Inspector General's (OIG) *Second Monthly Progress Report*, and it includes five audits or Reviews: (1) *Stop Data Analysis of Search Rates and Search Recovery Rates*; (2) an *Audit of the Field Complaint Acceptance Process*; (3) an *Audit of the Preliminary Inquiry Process*; (4) an *Audit of Personnel Arrested, Sued and/or Served with Administrative Process*; and (5) a *Review of the Promotional Consideration Procedure*.

This Monthly Progress Report contains the first Office of Inspector General (OIG) analysis of Stop Data. Following technical assistance received from the Negotiated Settlement Agreement Independent Monitoring Team, the analysis focuses on discretionary searches and search results.

As stated in the Department's Stop Data Annual Reports, the Department recognizes the complexities, challenges and responsibilities associated with the presentation of Stop Data statistics. Stop activity can be influenced by variables such as geographic area, crime trends, deployment patterns and staffing. Post-stop activity – such as reasons to cite, warn, search or arrest – may be similarly influenced. Factors such as crime trends, crime reduction strategies, problem solving approaches, deployment direction and commander expectations may cause measurable shifts in stop and post-stop activity data alike. These deviations may be observed across patrol beat boundaries or they may differentiate between various combinations of temporal and functional deployments of squads and officers.

The correct way to analyze Stop Data has been the subject of great debate throughout the United States. Bias-based policing continues to be an important concern and deserves careful analysis and scrutiny for shared and serious reasons. The issue – along with the Department's inherent willingness to address the accompanying affects upon Departmental trust and legitimacy - was an essential catalyst for Stop Data collection in the first place. The OIG has been closely monitoring the academic partnership between OPD and Stanford University to provide a comprehensive, in-depth and independent analysis of Stop Data. A report using a variety of different benchmarks and variables is imminent. Additional direction on this topic is expected from the State Attorney General's office as well. Assembly Bill 953 mandating Stop Data collection and reporting by all California law enforcement agencies became law on October 3rd, 2015.¹ The OIG will monitor the requirements of this new law closely as they become known; current OPD policy and practice will require amendment or expansion. We look forward to the progress this work will bring on a local, state and national level and hope our own effort will provide meaningful contribution to the goal.



Christopher C. Bolton
Lieutenant of Police
Office of Inspector General

¹ *Racial and Identity Profiling Act of 2015*, Government Code Section 12525.5. Available at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB953

AUDITS, REVIEWS, and/or INSPECTIONS

Stop Data Analysis of Search Rates and Search Recovery Rates

Lead Auditor: Lieutenant Chris Bolton, Office of Inspector General

Contributor(s): Kristin Burgess-Medeiros

Objective(s):

1. Evaluate and assess search and search recovery incidents for legality and consistency.
2. Evaluate whether there are identifiable causes contributing to the high search rates and high or low recovery rates exhibited by outlying officers.
3. Determine if there are any trends and patterns amongst officers with low and high search recovery rates.

Policy Referenced: Department General Order (DGO) M-19, *Prohibition against Racial Profiling*, Special Orders 9101 and 9043, and Report Writing Manuals (RWM) N-1, N-2, R-1 and R-2

Significant Finding(s): All stops and searches reviewed were lawful; recovery rates correlate strongly with an officer's Section or Area of assignment; higher recovery percentages were more likely to be articulated as being tied to intelligence led policing strategies or operations; probation and parole searches resulting in low search recoveries did not list an investigative nexus or additional reason for search other than the existence of the lawful search condition; and Stop Data related policies need to be updated and consistent.

Recommendation(s):

1. The intelligence led policing strategies employed by the "top five" officers should be used in coaching, mentoring and instructing lower recovery squads or officers in an effort to improve the value of their stops and searches.
2. It is apparent that numerous past changes to practice and procedure have not kept pace with controlling policy. No current policy or manual provides definition or instruction regarding recoveries or how to document recoveries given varying circumstances. The OIG recommends that the Department define recoveries and provide instruction on how to document defined recoveries across different searches and circumstances. The OIG has provided specific language and recommendations to the Department for consideration.
3. In addition to defining recoveries in policy and providing guidance on how to list recoveries, the below policies and manuals require evaluation against current or future definitions, procedures and practices:
 - a. Department General Order (DGO) M-19: Outdated
 - b. Special Orders 9101 and 9043: Require review and update to DGO M-19
 - c. Report Writing Manuals (RWM) N-1, N-2, R-1 and R-2: Require review, deletion or amendment.
 - d. Training Bulletins III-B.01 and I.A: Outdated and contain conflicting definitions pertaining to investigative contacts and detentions.
 - e. Search and seizure training should be refreshed for officers in conjunction with the above recommended policy revisions or development.
4. Stop Data analysis suggested best practices include developing the ability to conduct internal peer benchmarking. Officers working similar shifts, assignments, and geographical areas or beats can or should be compared to determine stop or search activity that is

different from his or her colleagues.”² Current OPD querying ability does not easily include such options and requires relying on a third party to provide data followed by a time intensive process of structuring and organizing data. The OIG encourages the City of Oakland Department of Information Technology to link the OPD Personnel Database with future Stop Data analysis tools, software or platforms.

5. The OIG should conduct future reviews on the “bottom five” officers evaluated in this review. Three of these officers have been loaned to highly specialized and intelligence led squads and two officers have newly assigned Area and Section commanders since the identified Stop Data review period ended. Changes to assignment, command and direction should positively influence future stop and search activity and results should be assessed.

Overview

“Stop Data” is information documented by officers following specified discretionary police-citizen contacts and searches as required by OPD policy. The information includes details pertaining to the locations, times and dates of citizen contacts, the reasons for these contacts, the apparent race/ethnicity of individuals contacted, and outcomes in terms of searches, search recoveries and incident dispositions. This data is collected, queried and reviewed by the Department to further research and understand how Stop Data may be used to gauge Constitutional policing practices and evaluate the measurable impacts these policing practices may have on our community.

Data often discussed and viewed as having strong correlation with effective and legitimate policing practices are *search rates* (how many times, during self-initiated stops, persons are searched) and *search recovery rates* (how many times a recovery of evidence, contraband or a weapon is made from a self-initiated search). Understanding that searches of persons are intrusive and a search’s legitimacy may be subjectively measured by the presence or absence of a productive outcome, the intent of this review was to evaluate officers’ disparate rates of recovery among statistical outliers, and examine searches by type of stop, search and outcome. The review included an evaluation of whether there are identifiable reasons or causes contributing to the high search rates and high or low recovery rates exhibited by outlying officers.

Methodology

Oakland Police Department discretionary stop and search incidents were queried for officers who had conducted a minimum of ten self-initiated contacts and at least three discretionary searches between January 17 and July 15, 2015.³ These criteria were used to ensure that officers included in the review had enough search data to meaningfully assess. The start date of the review, January 17, 2015, was the date OPD officer assignments began for a one-year period. In order to

² Lorie A. Fridell. 2004. *By the Numbers, A Guide For Analyzing Race Data from Vehicle Stops*. Report for and by the Police Executive Research Forum and U.S. Department of Justice, Office of Community Oriented Policing Services. http://www.cops.usdoj.gov/html/cd_rom/mayors72nd/pubs/ExecutiveSummaryBytheNumber.pdf

³ Searches mandated by policy were excluded from review: searches incident to a custodial arrest and inventory searches of towed vehicles

view stop and search activity in a manner most consistent with Areas and functions of assignment, this 2015 time frame was selected

The average discretionary search rate among all officers is 24%. However, for this review, the 2015 data was limited to all officers with a discretionary search rate of greater than 60%. In an attempt to focus on officers who conduct searches at a higher rate, a 60% search rate threshold was chosen. This provided a starting point for evaluation for this review, but may change in future reviews. Of the officers who met the criteria and search rate threshold, the five officers with the highest recovery rates and the five officers with the lowest recovery rates were selected for review. Time in service was calculated to generally gauge levels of experience, and Area and function of assignment was identified for each officer who met the established discretionary search and recovery rate criteria.⁴ The table below shows the officers' statistics used for this review:

Officer	Search	Not Searched	Total Stops	Search %	Recovery	No Recovery	Total Search	Recovery %	Assign.	Appx. Years
Officer A	19	10	29	66%	1	18	19	5%	CRT-4	9
Officer B	31	19	50	62%	2	29	31	6%	CRT-6	7
Officer C	20	5	25	80%	2	18	20	10%	CRT-4	8
Officer D	40	19	59	68%	7	33	40	18%	2-4B-1400	3
Officer E	22	11	33	67%	4	18	22	18%	CRT 5	13
Officer F	50	17	67	75%	39	11	50	78%	CRT-3	3
Officer G	52	22	74	70%	41	11	52	79%	PSO-3	7
Officer H	10	3	13	77%	8	2	10	80%	CID Gang	20
Officer I	20	7	27	74%	17	3	20	85%	PSO-3	7
Officer J	48	9	57	84%	43	5	48	90%	CRT-3	3
Total	312	122	434	72%	164	148	312	47%		

For the ten selected officers, the OIG obtained corresponding Field Investigation and/or Offense Reports that provided narrative and detail pertaining to each incident within the stop and search data. Where a pattern or trend was evident, individual incidents were evaluated to more closely assess any known or identifiable overall cause for the stop (i.e., directed patrol in area of high gang violence, sideshow enforcement, etc.), additional specificity regarding the cause for the search, and whether or not the combined stop and search was adequately represented by the collected and reported Stop Data. Relevant or controlling OPD General Orders, Special Orders and Report Writing Manuals were identified and reviewed in order to compare practices with current policy.

⁴ One officer changed assignment within the reviewed time period and the secondary assignment was identified and reviewed as an additional variable; however, all searches occurred within the officer's initial Area of assignment

The auditor met Area and Section commanders regarding the Stop Data incidents and corresponding officer search rates and search recovery rates.

Observations

As a group, the ten officers comprising the top and bottom tiers of recovery rates searched persons at a rate three times higher than the average officer did within the same time period. The average Department recovery rate among all officers for discretionary searches was 42% for the identified time period; the “top five” officers’ recovery rates averaged 82% while the “bottom five” officers’ average was 11%. Trends and patterns within stops and searches were compared and contrasted between the two groups of officers.

- The average number of searches conducted by each “bottom five” officer was 26 compared to an average of 36 searches per “top five” officer.
- Stops and searches of vehicles pursuant to an observed traffic violation represented the largest, shared trend within both groups of officers’ data.
 - 74% of the total stops conducted by “bottom five” officers were vehicle stops while 81% of the “top five” officers’ total stops were vehicle stops.
 - 83% of the “bottom five” officers’ total vehicle stops were for traffic violations compared to 82% by “top five” officers.
 - 72% of the “bottom five” officers’ total searches resulted from a vehicle stop compared to 79% of “top five” officer searches.
- The “top five” high recovery officers conducted more probable cause searches (+14%), but less searches overall for reasons related to probation and parole (-5%), weapons (-5%) and consent (-4%) than did “bottom five” officers.
- In terms of which types of searches were most productive (percentage of total recoveries by type of search), “top five” officer recoveries pursuant to probable cause searches were significantly higher (+11%) than “bottom five” searches of the same type while all other search types were relatively similar.

“Top Five” Officer Search Chart

Type	Searches	Recoveries	Recovery %	Search Type %	Search Type recovery %
Consent	3	1	33%	2%	1%
P.C.	87	81	93%	48%	55%
Prob/Parole	53	42	79%	29%	28%
Cursory	37	24	65%	21%	16%
Total	180	148	N/A	100%	100%

“Bottom Five” Officer Search Chart: Totals

Type	Searches	Recoveries	Recovery %	Search Type %	Search Type recovery %
Consent	8	1	13%	6%	6%
P.C.	45	7	16%	34%	44%
Prob/Parole	45	5	11%	34%	31%
Cursory	34	3	9%	26%	19%
Total	132	16	N/A	100%	100%

FINDING #1 - Inconsistency of Data Affecting Comparisons to Unknown Degrees

Of the ten officers reviewed, there appears to be a correlation between the recovery rates and the officer’s work assignment. All officers in the “bottom five” were assigned to Bureau of Field Operations Two. Four of the five officers in the “top five” were assigned to special resource teams in Bureau of Field Operations One, specifically Area Three. While this potential correlation between recovery rates and assignment may be explained by the scope of direction provided by different Area commanders and separate crime reduction strategies (see Finding #2), OIG and Area commanders identified additional independent variables which are believed to affect search recovery comparisons across different areas of assignment. For example, “top five” officer vehicle searches involving multiple person stops were more likely to list multiple persons associated with a single recovery from the vehicle (i.e., one evidentiary item recovered from a vehicle containing multiple occupants is attributed to all occupants). The result is a higher recovery rate.

“Top five” officer recoveries were also more likely to include a wide degree of articles considered and documented as recoveries while such definitions are not evidently applied by the lower recovery group of officers. These articles included items such as lawful or unconventional weapons which were temporarily seized during the course of a detention and returned at its conclusion; gang indicia observed during the course of a search but not seized as evidence; items not inherently illegally possessed but possibly possessed by a probationer for a nefarious purpose; and evidence of narcotic use or possession discovered and articulated by officers but not seized and recovered as evidence.

FINDING #2 - Higher Recoveries Consistent with More Focused Stops and Searches

Higher recovery percentages were more likely to be articulated as being tied to intelligence led policing strategies or operations. This was especially true among high recovering officers and their frequent articulation of undercover surveillances, information from confidential informants, or focused crime reduction strategy deployments. Highly productive stops and searches were evident among incidents: firearms, evidence, and suspects known or believed to be tied to crimes of violence frequently populated results.

FINDING #3 - Adequacies of Policy

OPD policy was reviewed to seek guidance on the definition of a Stop Data “recovery,” and how or when to attribute recoveries to multiple persons during a multiple person stop and search. The OIG located numerous policies and manuals within the OPD training library – nine total policy

directives or references in all. Some policies and manuals were outdated while others contained conflicting or incomplete direction. None of the policies specifically defined what a recovery is nor explained how to count recoveries for a multiple person stop. In the absence of policy, officers are left with providing their own valid reasons for and against considering certain results as recoveries.

Through review and conversation with Area and Section commanders, it is apparent to OIG that these recoveries were documented out of due diligence by officers. One commander noted that his officers delineate such items and circumstances as recoveries due to their knowledge that search recovery rates have become an increasingly important topic. Articulated recoveries (documenting in reports the details of the evidence recovered) further explain the context, reason and value for searches above and beyond the simple articulation of lawfulness or need.

FINDING #4 - Review Determined Stops and Searches were Lawful

All reviewed searches from both groups of officers were found to be lawful and properly articulated as based on objective causes, search conditions or circumstances.

FINDING #5 - Probation and Parole Searches

After review of “bottom five” searches and recoveries, probation and parole searches were one of the highest percentages of conducted searches with one of the lowest recovery rates. Only five recoveries were made as a result of 45 discretionary probation and parole searches – an 11% recovery rate for this type of search. Although stated with the knowledge that recovery rates do not capture the measure of probation or parole searches in terms of intelligence or deterrence gained, most searches conducted by “bottom five” officers did not list an investigative nexus or additional reason for search other than the existence of the lawful search condition.

CONCLUSION

Department wide recovery rates have continually improved over the past 12 to 18 months. Although this review resulted in concerns and recommendations geared toward consistency, nothing in this review eclipses achieved increases overall.

The quality of stop data improves with equivalent direction and subsequent, commensurate officer activity. The OIG is intimately involved in the creation of a Risk Management Meeting process designed to better address the degrees by which these efforts are met with success. The above recommendations for improved policy and direction will help ensure that future data analysis is meaningful and consistent.

Audit of Field Complaint Acceptance Process

Lead Auditor: Kristin Burgess-Medeiros, Office of Inspector General

Contributor(s): Officer Ann Pierce

Objective(s):

1. Determine whether Internal Affairs Division (IAD) logs are capturing all required information for complaints accepted in the field.

2. Determine whether the IAD receives an IAD Daily Incident Log from Communications no later than the next business day.
3. Determine if subjects receiving IBC cards are following up with IAD to initiate a formal complaint.
4. Determine whether a subject who received an IBC card indicated he/she wanted to make a formal complaint at the time he/she received the IBC.

Policy Referenced: Department General Order (DGO) M-03, *Complaints Against Department Personnel* and Communications Division Policy and Procedure C-2, *Receiving and Logging Complaints Against Personnel*.

Significant Finding(s): While the IAD logs are being completed properly overall for field complaints, using solely “Performance of Duty” as the nature of complaint description on two entries was insufficient.

Recommendation(s):

1. The Communications Division must document enough detail in the nature of complaint field for IAD intake staff to determine the type (i.e. rudeness, care of property, Miranda violation, etc.) of complaint and the seriousness of the complaint.

METHODOLOGY

IAD Daily Incident Logs

To determine whether IAD Daily Incident Logs are capturing all required information for complaints accepted in the field, the auditor reviewed all log entries for August 2015.

To determine whether the IAD receives an IAD Daily Incident Log from Communications no later than the next business day, the auditor reviewed the daily emails sent to IAD with the attached logs sent from Communications. The auditor reviewed the logs for the month of August 2015 to ensure IAD was receiving them by the next business day.

IBC Cards

To determine if subjects receiving IBC cards are following up with IAD to initiate a formal complaint, the auditor reviewed all IBC log entries for the month of August 2015. In addition, the auditor reviewed the IAD database to determine which of the subjects from the IBC logs filed a formal complaint subsequent to receiving the IBC.

To determine whether a subject who received an IBC card indicated he/she wanted to make a formal complaint at the time he/she received the IBC, the intake interview for each respective case was reviewed.

FINDING #1

Communications Division P&P C-2 states that when a citizen wishes to make a complaint in the field or calls the Communications Division to file a complaint, a supervisor responds to the scene to accept the complaint. The supervisor accepting the complaint must capture the following information, which is entered into the IAD Log.

- Date, time and location of incident
- Name and contact information of complainant
- Identity of subject personnel

- Nature of complaint
- Disposition code
- Notification of watch commander
- Documented reason for any delays in response greater than three hours

There were a total of 36 entries on the IAD log during August 2015. Four of the entries were for Department generated complaints and were eliminated from the population. The remaining 32 entries were for complaints made by citizens. Overall, the IAD logs were completed correctly. In two entries, the nature of the complaint stated “performance of duty.” Performance of duty is overly broad and can include any number of policy violations. If this is the only information provided to IAD, they have no way of knowing the actual allegations or the seriousness of the complaint (Class I vs. Class II), which can be problematic when assigning cases and prioritizing them.

There was one entry in which Communications took a complaint about delay in service and documented UTC in the “Time Complainant Contacted by Supervisor Taking Complaint.” There was no documentation of when or how the supervisor tried to make contact. There was also one entry in which the disposition code was missing.

The policy also states the 2nd Watch Shift Supervisor shall prepare and send a copy of the log via email to the IAD (opdiad@oaklandnet.com). The auditor reviewed the daily emails received by IAD with the attached logs sent from Communications for the month of August 2015 to ensure IAD was receiving them by the next business day. The audit indicated that IAD does receive each respective log by the next business day.

FINDING #2

DGO M-3 states that when personnel are unsure if a citizen wishes to make a complaint or if a citizen refuses to wait for a supervisor, the member/employee shall provide the citizen with an OPD Informational Business Card (IBC) and call the Communications Section with the details of the incident for entry onto the IBC Log. There were a total of 111 IBC log entries during the month of August, 2015. Four entries did not include the name of the subject receiving the IBC, so the auditor was unable to check the IAD database for the complainant’s name. For six (5%) of the 107 entries checked, the auditor was able to locate a formal complaint filed subsequent to the IBC being issued. The entry on the IBC logs for these six incidents stated that the subject either did not want to make a complaint at the time or stated they would file a complaint on his/her own.

To determine whether a subject who received an IBC card indicated he/she wanted to make a formal complaint at the time he/she received the IBC, the intake interviews for the respective cases were reviewed. The intake interviews were reviewed for five of the six IBC entries that were followed by a formal complaint. None of the complainants indicated in their interviews that they had wanted to make a formal complaint at the time they received the IBC card. One interview was not reviewed because the recorded statement was still with the Division Level investigator.

Please note that it is possible that some subjects receiving IBC cards did file formal complaints, but the auditor was unable to locate them. If the spelling of the subject's name on the IBC log did not match that of the IAD database, the case may not have been located.

CONCLUSION

The Department's field complaint acceptance process is effective and efficient. IAD is receiving the complaint data by the next business day and the IAD logs are overall completed properly. Lastly, there was no indication that officers are handing out IBC cards in lieu of taking a formal complaint.

Audit of Preliminary Inquiry Process

Lead Auditor: Sergeant John Haney, Office of Inspector General

Contributor(s): Rebecca Johnson

Objective(s):

1. Determine whether the assigned investigator conducted a preliminary investigation within 14 calendar days of receiving the complaint.
2. Determine whether the assigned investigator followed protocol by taking the minimum number of investigative steps to conduct the preliminary investigation.
3. Determine whether the assigned investigator made a recommendation at the conclusion of the preliminary investigation.
4. Determine whether the assigned investigator's first level commander/manager reviewed the *Complaint Memorandum*.
5. Determine whether an IAD Commander made the final decision on the assigned investigator's recommendation.

Policy Referenced: Department General Order (DGO) M-03, *Complaints against Department Personnel*

Significant Finding(s): The Preliminary Inquiry process is being used appropriately and effectively by OPD personnel.

Recommendation(s): Chronological Activity Logs are required by Training Bulletin V-T.1. The auditor noted that assigned investigators are frequently not using Chronological Logs to document their work progress during Preliminary Inquiries. This causes a potential risk to the Department as it sometimes forces an evaluator to construct an investigation's timeline using only associated correspondence and ancillary documents. The use of Chronological Logs provides for the most accurate documentation of the investigation's timeline, sequence of investigative steps, and movement through the chain of review. It is recommended that OPD supervisors receive refresher training in the use of these logs during future Departmental training.

Overview

The Office of Inspector General (OIG) initiated an audit of the Department's adherence to policies and procedures set forth in Department General Order (DGO) M-3, *Complaints against Departmental Personnel or Procedures*. The audit specifically evaluated OPD's personnel practices and procedures as they are applied to conducting preliminary inquiries on all complaints received in the field or otherwise not directly submitted to the Internal Affairs

Division (IAD). DGO M-3 states that a Preliminary Inquiry (PI) shall be completed for all complaints upon receipt by a supervisor. The purpose of the PI is for the assigned investigator to do a preliminary investigation concurrent with complaint acceptance rather than relying on IAD evaluation and assignment. The preliminary inquiry process and procedure was incorporated into DGO M-3 in August of 2013 and has not been formally evaluated since its inception.

Methodology

The audit covered complaints closed in August 2015. Specifically, those complaints which originated as preliminary inquiries outside of IAD were examined. The audit compared the Department's policies and procedures against its practices to determine compliance. With the assistance of IAD staff, the auditor obtained copies of all complaints closed in August 2015. After reviewing these, the auditor determined that nine of these closed complaints had originated as preliminary inquiries outside of IAD. These were selected for review in the audit.

FINDING #1

In eight of the nine (88.9%) cases the assigned investigator completed their preliminary investigation within the required time frame. However, five of these were completed in excess of 14 days due to requested (and subsequently approved) due date extensions. The extensions ranged in duration, but averaged just below five weeks. The reasons for the extensions also varied considerably. Investigators were on approved leave in two cases. In three other cases, investigators cited a need for additional time to conduct their investigation (inordinate amount of PDRD to review, working on other concurrent investigations, etc.) as the reason for the extension. The absence of a Chronological Log, in some cases, made it more difficult to determine when the extensions were actually requested.

Case documentation indicates that assigned investigators are actively examining the complaints. In several cases, the investigator was able to make an assessment of the complaint within 14 days but requested an extension so that they could complete a full investigation prior to submission for evaluation at IAD. There was no indication that the extensions were requested due to unnecessary procrastination and it appears that each of these was warranted.

In one of the nine cases, the assigned investigator failed to submit their preliminary investigation within the required 14 days without receiving an extension. In this case the investigator submitted the investigation to their commander/manager one day late.

FINDING #2

DGO M-3 states that the minimum steps to be taken in a PI include, but are not limited to:

- A briefing by directly involved members and employees;
- An interview with the complainant to determine the nature of the complaint;
- A recorded statement from the complainant;
- A visit to the scene of the incident, if feasible, to look for evidence and canvass for potential witnesses;
- An interview with any witnesses and recorded statements, if appropriate;
- An explanation of relevant policy, procedure, and governing laws to the complainant if appropriate;

- A review of PDRD recordings; and
- Conference with first-level commander/manager regarding recommendations and best course of action.

The auditor reviewed nine cases to determine whether the minimum number of steps was taken by the investigator. The audit indicated that none of the cases included all steps required because in each case one or more of the mandated steps was unnecessary. For example, a briefing by directly involved members and employees did not always occur. Instead, supervisors reviewed PDRD video footage and listened to Dispatch recordings as a way of determining the actions of the directly involved members and employees.

Upon reviewing the types of alleged complaints, the audit indicated that in eight of the nine cases reviewed, the respective investigators conducted effective and efficient preliminary investigations. One case involving racial profiling was the exception; the IAD commander stated that the investigator should have asked more clarifying questions from the complainant. Upon reviewing case file documentation, the audit indicated that the commander's critique was correct. Although the investigator conducted the interview, as policy dictates, it was not done properly. Although ultimately corrected through follow-up, the Preliminary Inquiry was found to be not fully effective as a result.

FINDING #3

DGO M-3 states that at the conclusion of the PI, the supervisor shall complete a *Complaint Memorandum* which minimally includes (1) summary of complaint; (2) investigative steps taken; and (3) case file recommendation. The policy also states that the investigator's case file recommendation is one of the following:

- Further Investigate;
- Handle at Supervisor Level;
- Administrative Closure; or
- Summary Finding.

In all nine (100%) cases, the assigned investigator completed a *Complaint Memorandum*. These all included a summary of complaint, description of investigative steps taken, and a case recommendation. In five cases, the recommendation was *Summary Finding*. In three cases, the recommendation was *Further Investigation* and one recommendation was for *Administrative Closure*. Although in some instances Internal Affairs subsequently disagreed, each Preliminary Inquiry adequately explained how the investigator arrived at their recommendation.

FINDING #4

DGO M-3 states that the investigator's first level commander/manager shall review the *Complaint Memorandum* form and other pertinent documents for accuracy, completeness, quality, and the appropriateness of the recommendation and/or resolution. Upon reviewing the documentation, the first level commander/manager shall either concur with the recommendation by endorsing the memorandum or disagree with the recommendations by preparing and attaching his/her own memo, detailing the reasons for an alternate recommendation. In addition, the

policy states that the first level commander/manager shall ensure the completed and reviewed *Complaint Memorandum* is hand-delivered to the IAD within seven calendar days.

In eight of the nine (88.9%) cases, the assigned investigator's first level commander/manager reviewed the submitted *Complaint Memorandum* and concurred with the stated recommendation. In one case, the documentation indicated that the assigned investigator had conferred with Internal Affairs personnel during the investigation. In this report, the approval on the document is from IAD command staff. This is technically not within policy, but the audit found no fault in the investigator conferring with Internal Affairs in lieu of his first level commander in this situation. Moreover, the audit indicated that there were no instances in which the first level commander/manager disagreed with the investigator's recommendation.

In seven of the nine (77.8%) cases, the auditor was able to determine that the reviewing commander/manager ensured that the completed *Complaint Memorandum* was delivered to IAD within seven days of receipt. In one of the two other cases, the commander asked for an extension (which was granted) one day after the due date. That case was subsequently delivered to IAD within the timeframe granted in the extension. The final case was submitted within the required time frame but was not accepted by IAD because it was missing required elements. It was returned for corrections and was not received (in full) by IAD until five days after the 21 day due date. Again, the absence of a Chronological Log, in some cases, made it more difficult to determine when timelines were met.

FINDING #5

DGO M-3 states that the IAD Commander or designee shall make the final decision regarding any dispute, discrepancy, or the appropriateness of the recommendation and/or resolution. In all nine (100%) cases, an IAD commander is documented as having made the final decision/approval on the case recommendation.

Additional Observations

The audit indicates that when OPD personnel conduct a preliminary inquiry, they constructively adhere to relevant policy as set forth in DGO M-3. When used, the preliminary inquiry process appears to be a streamlined way to intake, evaluate, and investigate citizen complaints. Allowing the "point of contact" supervisor to immediately undertake the evaluation and analysis portions of the complaint allows for a more informed and timely investigation. The cases reviewed were finalized and closed by IAD within 143 days on average and within the 180 day timeliness standard required by DGO M-3. Recommendations to improve the overall timelines of investigations were issued in the OIG September 2015 Monthly Progress Report.

CONCLUSION

It is important to note that the preliminary inquiry process and associated policy is still relatively new to OPD. The process now places more investigative and evaluative responsibility on personnel outside of Internal Affairs while handling citizens' complaints. Some additional mistakes may be made by personnel previously unaccustomed to investigating complaints. However, the Department, as a whole, will surely benefit from increased awareness and permeation of the citizen complaint investigation procedure throughout its ranks.

ADDITIONAL AUDITS, REVIEWS, AND/OR INSPECTIONS

Audit of Personnel Arrested, Sued and/or Served with Administrative Process

Lead Auditor: Sergeant John Haney, Office of Inspector General

Objective(s):

1. Determine whether OPD personnel notify the IAD within 72 hours of being arrested, sued, and/or served with an administrative process.
2. Determine whether personnel who fail to do so are held accountable.
3. Determine whether all personnel assigned to specialized units complete an annual *Statement of Compliance File* and whether the IAD reviews and analyzes the files.

Policy Referenced: Department General Order (DGO) E-3.1, *Department Notification Compliance Verification* and DGO F-7, *Drivers' Licenses*.

Significant Finding(s): The Department is actively employing numerous overlaying safeguards and personnel checks to ensure that members/employees are following the rules set forth in DGO E-3.1. The use of the *Statement of Compliance Files* for specialized units greatly aids in this process and is being used accordingly by Departmental staff. No instances were identified where it was clear that a member or employee was aware that they were a party to a specified event (arrest, lawsuit, etc.) and failed to properly report it. The one objective that was found to not be effectively compliant relates to DGO F-7, Drivers' Licenses. The failure to act upon the identification of a member's suspended license was a serious error but the auditor found no evidence that this occurrence was part of a pattern or trend.

Recommendation(s):

1. DGO E-3.1 was last updated in October 2009. The structuring of the Department has changed since that time. IADITU staff recommended that the list of specialized units be updated to remain consistent with the intent and spirit of the policy. The auditor concurs with this recommendation.
2. The IADITU also recommends that DGO E-3.1 is amended to say anyone "loaned or transferred" to a specialized unit shall complete a statement of compliance. Currently, DGO E-3.1 only states individuals being "transferred" to a specialized unit shall complete a statement of compliance. If this DGO was to be amended, potential at risk individuals could be identified more efficiently. The auditor concurs with this recommendation.
3. Section, DGO F-7 places the responsibilities of handling notifications of member/employees' Driver License suspension/revocations upon *both* the IADITU and the effected member/employee's unit commander. The auditor recommends that Command staff immediately take action when being alerted to a license suspension/revocation by preparing and serving an advisement memorandum to the affected member/employee. By not relying on the IADITU staff to start the process, the likelihood of a notification being missed (due to personnel movement, human error, etc.) will be greatly reduced.
4. Additionally, the auditor recommends that the affected member's supervisor shall document the serving of the advising memorandum in an iPas Supervisory Note File.

Overview

This audit was conducted to ensure the Oakland Police Department's members/employees are following protocol if they are a party to specific infractions outlined in DGO's E-3.1 and DGO F-7. DGO E-3.1, *Department Notification Compliance Verification*, states that any member/employee shall prepare and forward a memorandum, via email or hand-delivery, directly to the IAD Commander within 72 hours if they are party to a lawsuit; an arrest; a CDL suspension or revocation; or a citation. The policy further states that a member/employee has to forward the aforementioned memorandum if he/she is served with civil or an administrative process (as described above) or becomes aware that he/she is under investigation for any misdemeanor or felony in this or another jurisdiction. In addition, the general order requires members/employees working in specialized units to annually submit a *Statement of Compliance* form. In addition DGO F-7, *Drivers' Licenses*, reiterates a member/employee's responsibility to notify the IAD commander, via memorandum, of his/her suspended or revoked. Moreover, DGO E-3.1 requires members/employees, who work in specialized units, to annually forward a Statement of Compliance File to the IAD Integrity Unit. The *Statement of Compliance File* is another method of checking whether a member/employee is part of any of the aforementioned infractions.

METHODOLOGY

To determine whether OPD personnel, in both specialized and non-specialized units, are adhering to the protocol outlined in DGO E-3.1, the auditor coordinated efforts with the Department's Internal Affairs Division (IAD) staff members. The auditor met with IAD personnel to gain access to the division's relevant records and databases. The auditor also interviewed members assigned to the Internal Affairs Division to determine current practices and procedures. This audit covered an approximate one year time span of March 1, 2014 to February 28, 2015.

To determine whether OPD personnel are adhering to the protocol outlined in DGO F-7, the auditor coordinated efforts with the Department's Communications Division personnel to gain access to the copies of the monthly personnel driver license/warrant checks completed by the division during the time period of March 1, 2014 to February 28, 2015.

FINDING #1

The auditor focused on the requirements set forth in DGO E-3.1, regarding reporting requirements and accountability for non-reporting by reviewing a list of all IAD cases involving Manual of Rules violations 314.28 (Notification to Department following Arrest, Lawsuit, etc.) and 314.42 (Obedience to Laws) during the time period of 1Mar14 to 28Feb15. Upon review of the summaries of 31 cases, only two cases (described below) were found applicable to the audit. Based on two identified incidents during the reviewed time period, the audit indicates that members/employees are adhering to policy and reporting their arrests within 72 hours. The first case involved a Driving Under the Influence (DUI) arrest of a person employed by the OPD. Supporting documentation indicates that the employee notified her supervisor the following day and that the supervisor sent a corresponding memorandum to IAD the same day. The second case also involved a DUI arrest of a person employed by the OPD. The individual reported this to IAD via written memorandum.

In addition to a member/employee's self-reporting requirement if party to one of the aforementioned infractions, the Department's IAD Integrity Unit also conducts integrity tests on members/employees. From the Internal Affairs Division Integrity Testing Unit (IADITU), the auditor received a list of all Notification Compliance Checks for selected Department personnel during the past six months. Ten OPD employees were selected for the checks during this time period. All members/employees passed these tests with one exception. An officer currently on loan to a specialized unit failed the test with an alleged violation of MOR 314.84, Debts—Incurring and Payment. The IADITU recommended that an Internal Affairs investigation be initiated as a Risk Management measure to fully evaluate whether the officer was in violation of the above stated policy.

FINDING #2

The auditor reviewed the *Statement of Compliance Files* for 134 OPD members/employees assigned to specialized units during the compliance check period. However, only 133 files are applicable to the audit. There was one employee/member who did not complete the form due to being on injury leave. Of the 133 applicable files reviewed, all (100%) employees/members completed the *Statement of Compliance File* as required.

FINDING #3

The auditor focused on the requirements set forth in DGO F-7, regarding reporting requirements and accountability for suspended or revoked drivers licenses by copies of the monthly personnel driver license/warrant checks completed by the Communications Division during the time period of 1Mar14 to 28Feb15. Two members/employees were discovered to have suspended drivers' licenses during the reviewed time period. One employee has had a suspended license for several years and notification was not made at the time the license was originally suspended. After a monthly 2014 DMV check, the Internal Affairs Division Integrity Testing Unit (IADITU) became aware of the suspension and admonished the employee not to drive. It should be noted that this employee's job description did not require or involve driving a motor vehicle. An administrative investigation was initiated by the IADITU and it was determined that no formal Internal Affairs case would be opened.

The other member/employee with a suspended license was identified during one of the Communications Division's monthly DMV checks. However, the ITU did not have a copy of the monthly memo during which the suspended license was identified. This is likely due to a transition in ITU staffing during the same period. There were no records found that any action had been taken regarding the suspended license. At the auditor's request, the IADITU initiated their process of notifying the employee and employee's chain of command.

The auditor noted during the audit that the memo identifying members/employees with suspended licenses gets emailed to both the IADITU and the involved member's unit commander, but only the IADITU appears to take action. Because the ITU missed the memo from Communications during the month that the suspension was identified, a member went seven months without any admonishment or corrective action. The policy places the responsibilities of handling these issues upon both the IADITU and the effected member/employee's unit commander. The audit revealed that, in practice, the IADITU almost exclusively initiates any follow-up measures taken by the Department.

CONCLUSION

Overall, the Department's members/employees are following policy. However, the Department should implement the recommendations above to ensure it identifies member/employees who are party to the aforementioned infractions in a timely manner.

Review of Promotional Consideration Procedure

Lead Auditor: Rebecca Johnson, Office of Inspector General

Contributors: Kristin Burgess-Medeiros
Vera Edwards

Objective: Determine whether the Oakland Police Department's Personnel Section complies with its policy regarding considering members for promotion to vacant sergeant, lieutenant, and captain positions.

Policy Referenced: Personnel Division (sic) Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure* and the Negotiated Settlement Agreement's Task 46, *Promotional Consideration*

Significant Finding(s): The information in the promotional packages is not compiled as specified by the procedures outlined in policy. In addition, there is no assessment of the candidate's uses of force, the quality of citizen contacts or his/her support for the Department's integrity measures articulated in policy or documented in the promotional packages.

Recommendation(s):

Much of the information the Personnel Section gathers for the promotional packages can be obtained by conducting an assessment of a candidate's PAS file. Departmental General Order, D-17, *Personnel Assessment System*, the Department's early warning policy, requires "supervisors, commanders, managers, and other authorized personnel to take into account relevant and appropriate PAS information when reviewing and considering personnel actions such as...promotions."⁵ The PAS file includes 20 performance dimensions used as an early warning system to detect positive and negative conduct. In addition, the 20 performance dimensions are a reflection of the Department's commitment to integrity and accountability.⁶ Therefore, the Department should revise Personnel Division Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*, to include an assessment of the candidate's PAS file. The assessment of the candidate's PAS file automatically includes a review of the candidate's uses of force and his/her integrity measures. Once the policy is revised, the Department should follow it to ensure its practices correspond to its policy.

Overview

On May 5, 2015, the Audit and Inspections Unit of the Office of Inspector General initiated a review to determine whether the Oakland Police Department's (OPD) Personnel Section's business practices for considering members for promotion to vacant sergeant, lieutenant, and captain positions comply with the procedures outlined in its Personnel Division (sic) Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*. To conduct this

⁵ DGO D-17, Section III.C

⁶ Ibid. Section I

review, the audit team met with Personnel Section's Personnel Manager and Support Services Supervisor, advising them of the review in order to gain access to members' promotional packages and other documents (i.e., list promoted members, promotional materials, job interview questions, etc.). During the same meeting, the audit team interviewed the same Personnel Section employees to gain knowledge related to the Department's promotional consideration procedure. Moreover, the audit team conferred with other supervisors/commanders, when necessary, to aid in clarifying information documented in the promotional packages and any other questions regarding the Department's practice or procedure.

The Oakland Police Department's Personnel Division Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*, provides authority and guidance over its business practices for considering members for promotion to vacant sergeant, lieutenant, and captain positions. The policy's main purpose is "to set forth Personnel Division policy and procedures for aggregating, preparing, and maintaining promotional consideration criteria to assist the Chief of Police and City Administrator in the promotional selection process of sworn personnel." A review of the policy's purpose indicates that the Personnel Section has four main duties that will assist the Chief of Police and the City Administrator in the promotional selection process for sworn personnel: (1) collect, (2) prepare, and (3) maintain the standards for promotional consideration and (4) coordinate the development of interview questions. Subsequently, the Personnel Section creates for each candidate a promotional package that includes documentation of criterions established in the policy and his/her interview questions rating sheets. The promotional package is given to the Chief of Police and City Administrator to assist in the promotional selection process of sworn personnel.

The review indicated that the OPD Personnel Section's business practices for considering members for promotion to vacant sergeant, lieutenant, and captain positions need improvement. The information in the promotional packages is not compiled as specified by the procedures outlined in its Personnel Division (sic) Policy and Procedure Manual, Policy 08-01, *Promotional Consideration*. In addition, there is no assessment of the candidate's uses of force, the quality of citizen contacts or his/her support for the Department's integrity measures articulated in policy or documented in the promotional packages.

METHODOLOGY

Audit Scope

The review focused on whether the Oakland Police Department's (OPD) Personnel Section's business practices for considering members for promotion to vacant sergeant, lieutenant, and captain positions comply with the procedures outlined in its Personnel Division (sic) Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*. To conduct the review, the auditor examined a sample of promotional packages of members who were promoted October 13, 2012 to March 28, 2015.

Population

The population was comprised of the promotional packages of the members who were promoted October 13, 2012 to March 28, 2015, a total of 79 promotional packages. A breakdown of the

promotional packages by rank is as follows: 4 captain packages, 17 lieutenant packages, and 58 sergeant packages.

Identification of the Random Sample

Using a one-tailed test, a random sample of 50 promotional packages was reviewed to achieve a 95 percent confidence level (with a +/-4 percent error rate) that the Personnel Section's business practices for considering members for promotion to vacant sergeant, lieutenant, and captain positions comply with the procedures outlined in its Personnel Division (sic) Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*. The sample was composed of the promotional packages of 4 captains, 10 lieutenants, and 36 sergeants.

FINDING #1

The Department is not preparing the promotional packages according to policy. The Department's Personnel Division Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*, states that the Personnel Section shall prepare a promotional package for each candidate to include the following:

- A Police Database (PDB) printout of the candidate's personnel record;
- Historical Summary;
- Supporting documents [Promotional Consideration Report from the Internal Affairs Division (IAD) and litigation information from the Office of the City Attorney (OCA)]; and
- Supervisor/Commander Input Form.

The auditor reviewed 50 promotional packages to determine whether the information was included. The results are as follows:

PDB Printout of the Candidate's Personnel Record

The policy requires the Personnel Section to "Print a personnel record for each candidate from the Police Database (PDB)."⁷ The review indicated that the Department complied with this requirement. There were 50 promotional packages reviewed, and all 50 (100%) packages included a PDB printout of the candidate's personnel record.

Historical Summary

The Historical Summary, according to policy, shall include the following information for the prior five (5) years:⁸

1. Name of candidate;
2. Rank for consideration;
3. Month/year of consideration;
4. Complaint history summary (sustained and not sustained complaints completed within the time limits imposed by Government Code Section 3304);

⁷ Personnel Division Policy and Procedure, Policy 08-01, Section II.B3.

⁸ Ibid. Section II.C.

5. Discipline history;
6. Sick leave record;
7. Award/commendations;
8. Performance appraisal(s) overall rating;
9. Appointment history;
10. Assignment history; and
11. Litigation payouts.

The review indicated that the Department complied with this requirement by including a *Historical Summary* for each candidate, but the information in the prepared *Historical Summary* was not always complete. There were 50 promotional packages reviewed, and all 50 (100%) packages included a *Historical Summary* for each candidate. Although there was a *Historical Summary* created for each candidate, the information gathered and included was not always as stated in policy. Below are some of the issues:

Background Information Reviewed for Each Candidate

The policy states that the *Historical Summary* information gathered was to be “for the prior five (5) years.” The review indicated that in practice more than five years of data is gathered for each candidate. The PDB printout, although not stated as supporting documentation in the policy, was, in fact, used as supporting documentation to show each candidate’s injury, awards and/or commendations, appointments, and assignment history information. The printout included information dating back to the hiring of the candidates and all subsequent appointments, injuries, awards/commendations, and assignments the candidates had since that time, which in all but one instance was more than five years. The median number of years of information covered on the PDB printout was 13.

Complaint History Summary

The policy states that the *Historical Summary* shall include the candidate’s prior five years complaint history of sustained and not sustained complaints completed within the time limits imposed by Government Code Section 3304. The review indicated that the complaint information is not part of the Historical History document. It is actually found in supporting documentation, which is a printout from the Internal Affairs Division (IAD) entitled *Promotional Consideration Report*. A *Promotional Consideration Report* was created for each (100%) of the 50 candidates, whether or not he/she had any discipline. However there were 12 (24%) instances in which the report not only included a candidate’s complaints with a finding of sustained and not sustained but also the candidate’s complaints with a finding of unfounded, exonerated, administrative closure, and/or informal resolution. In addition, there were seven (14%) instances in which the submitted complaint information exceeded the prior five years.

Sick Leave Record

Although the policy does not articulate whether merely injury leave is to be considered as the “sick leave record” for a candidate, the review indicated that the *Historical Summary* did include

injury leave information via the PDB printout. The review also indicated that there was no documented assessment of the candidate's *sick leave taken*⁹ in any of the promotional packages.

Litigation Payouts

The policy states the Personnel Section shall "Forward a request for litigation information to the Office of the City Attorney (OCA) for each candidate. Include the response in the promotional package. Include any litigation information from the OCA in the promotional package."¹⁰ The review indicated that there is no documented assessment of litigation information and/or payouts in any of the promotional packages. Current practice revealed that the OCA forwards litigation to the Internal Affairs Division and that the Division **enters a complaint record to a named member or employee** in cases where litigation, a lawsuit or a legal claim alleges a manual of rules violation(s). This practice is insufficient given the requirements and intent of policy.

Supervisor/Commander Input Form

The review indicated that the promotional package does not always include a completed *Supervisor/Commander Input Form*. The policy states that the Personnel Section shall forward a *Supervisor/Commander Input Form* to each candidate's Bureau Chief/Director requesting input from the candidate's immediate supervisor and advising him/her that the input shall include [1] the candidate's commitment to community policing and [2] the quality of citizen contacts.¹¹ Of the 50 files reviewed, there were only six (12%) instances in which there was documented evidence that the candidate's supervisor/commander completed the form. In addition, of the six forms completed, there were no questions that addressed the quality of citizen contacts.

FINDING #2

Although the overall concept and quality of community policing may inherently include an assessment of a candidate's citizen contacts, policy appears to make distinction. The Department is not developing interview questions to address the quality of the candidate's citizen contacts. The policy states that one of the duties of the Personnel Section is to "Coordinate the development of interview questions [and] ensure the interview questions address [1] the candidate's commitment to community policing and [2] the quality of citizen contacts. Provide a set of interview questions for each rank of promotion and forward to designated interviewers."¹² There were 50 promotional packages reviewed, and 49 (98%) packages included a set of interview questions documenting the respective candidate's answers to the questions. There was one (2%) promotional package that did not include a set of interview questions. Of the 49 packages that included a set of interview questions, all 49 (100%) sets of questions included a question regarding community policing, but none (0%) of the questions specifically addressed the quality of the candidate's citizen contacts.

Other Concerns

The Oakland Police Department's Personnel Division Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*, provides authority and guidance over its business

⁹ Sick leave taken is leave used by a member whose illness is not an on-the-job injury.

¹⁰ Ibid. Section II.B2a-b.

¹¹ Personnel Division Policy and Procedure, Policy 08-01, Section II.D.

¹² Ibid. Section IV.B

practices for considering members for promotion to vacant sergeant, lieutenant, and captain positions. These are very important positions since they are responsible for supervising law enforcement activities. Their responsibilities include monitoring members' uses of force, ensuring members develop working relationships with the community, and ensuring members adhere to the Department's integrity measures. Upon review of the Department's policy and the 50 promotional packages, neither the policy nor the documentation in the promotional packages included an assessment of the candidates' uses of force, the quality of his/her citizen contacts, and his/her support for *Departmental* integrity measures to ensure he/she is able to execute his duties in an effective and efficient manner if selected.

CONCLUSION

In closing, all positive and negative conduct issues to be considered when promoting sworn personnel to the positions of sergeant, lieutenant, and captain are captured in the Department's Personnel Assessment System. By revising Personnel Division Policy and Procedure Manual, Policy 08-01, *Promotional Consideration Procedure*, to include a PAS file assessment for each candidate will diminish the risk to the City of Oakland, the Oakland Police Department, and, most of all, the public.

NEXT MONTH'S PLANNED REVIEWS

To assist the Department in managing risk in conjunction with our policy and best available practices, there are two reviews scheduled for November 2015. These reviews will be centered on high risk performance areas and include snapshots of recent data, incidents and trends. The two reviews are:

November 2015

1. Quality of Internal Affairs Division Investigations
2. Investigator Bias in IAD Investigations