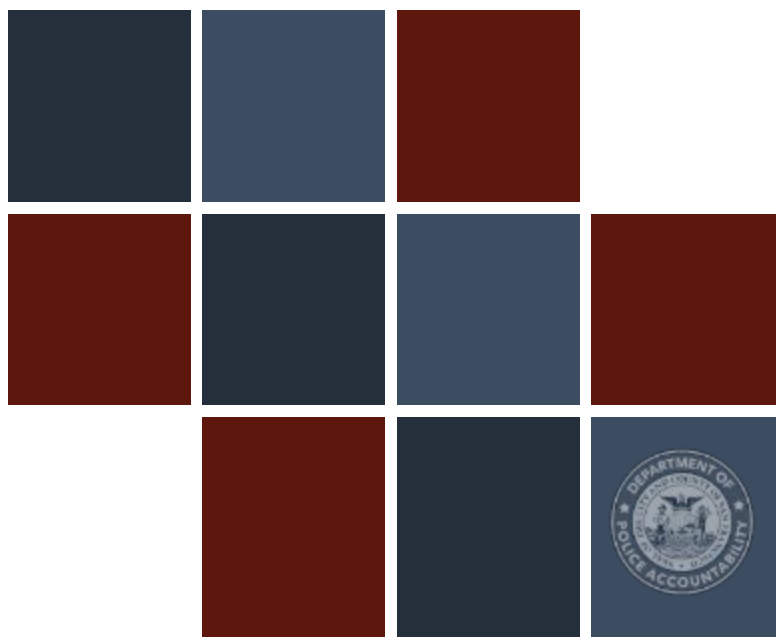


San Francisco Police Department: Action Is Needed to Ensure the Completeness and Accuracy of Stop Data

California's Racial and Identity Profiling Act of 2015 requires law enforcement agencies to report stop data annually to the Attorney General. SFPD's audits focus on resolving unfinished stop reports. However, its audits do not address risks to data integrity, such as unreported stops and inaccurate reports. Unlike other law enforcement agencies, SFPD does not require supervisors to verify the completeness and accuracy of stop data. Further, SFPD does not test stop data to identify potential data reliability issues, increasing the risk of reporting inaccurate information to the Attorney General and local policymakers. In addition, system transition issues in 2023 resulted in data validation errors and incomplete records that compromise data integrity and can make the data unreliable for analysis.



December 20, 2024

**SAN FRANCISCO
DEPARTMENT OF
POLICE ACCOUNTABILITY
Audit Division**

Executive Summary

The Issues

California’s Racial and Identity Profiling Act of 2015 requires law enforcement agencies to report stop data annually to the Attorney General.

In 2023, a DPA investigation found that an officer repeatedly misreported the race of individuals stopped. The San Francisco Board of Supervisors and Police Commission questioned whether this was an isolated incident or indicative of a broader issue.

Reliable Stop Data Can Build Public Trust

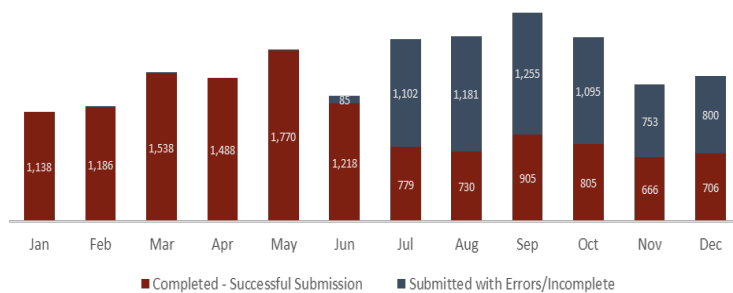
Racial and identity profiling erodes trust in law enforcement. Data collection is critical for developing solutions to end profiling.

Complete and Accurate Data Supports SFPD’s Strategic Initiatives

SFPD aims to use data to measure performance and increase accountability. Lower staffing levels necessitate increased efficiency for law enforcement agencies, requiring the allocation of limited resources to strategies proven to increase safety and reduce crime. A high degree of data integrity is essential for SFPD to use stop data to evaluate operational effectiveness, efficiency, and equity.

Key Findings

- **SFPD’s audits do not address risks to data integrity, including unreported stops and inaccurate reports** (see Finding 1.1). Audits focus on resolving unfinished reports. Expanding audit scope could provide SFPD with assurance that officers report stops consistently, accurately, and in compliance with data collection requirements. Ensuring consistent and accurate reporting could help maintain the integrity of data SFPD needs to better serve the community and increase accountability.
- **Unlike other California law enforcement agencies, SFPD does not require supervisors to verify the completeness and accuracy of stop data** (see Finding 1.3). Without supervisor reviews, inconsistent data collection and/or inaccurate entries could go undetected, undermining the reliability of data SFPD could use to develop leadership, training, and policy interventions aimed at strengthening community relationships.
- **SFPD does not test stop data to identify potential data reliability issues** (see Finding 1.4). As a result, SFPD risks reporting inaccurate and incomplete data to the Attorney General and local policymakers. Unreliable data can result in inaccurate assessments of SFPD’s reforms intended to increase public trust through improvements in community policing practices, transparency, and accountability.
- **SFPD’s transition to a new collection system at the end of June 2023 resulted in increased data validation errors and incomplete reports** (see Finding 3.1). Of the 19,280 records SFPD reported in 2023, 6,274 (33%) contained issues that compromise data integrity and can make the data unreliable for analysis.



Contents

Executive Summary	2
Background	6
<i>Exhibit 1: Stops reported by SFPD to the California Attorney General.</i>	<i>6</i>
<i>Exhibit 2: SFPD's stop data audits do not align with COPS Office guidance or the department's own policy.</i>	<i>7</i>
Finding 1: SFPD resolves unfinished reports but must expand audits to ensure that stop data are complete and accurate.	9
Finding 1.1: SFPD's audits do not address risks to data integrity, including unreported stops and inaccurate reports.	9
<i>Exhibit 3: SFPD's audits do not ensure key components of data integrity.</i>	<i>10</i>
Finding 1.2: SFPD lacks a mechanism to ensure the timely completion of reports, increasing the risk of delayed submissions that can compromise data accuracy.	11
Finding 1.3: Unlike other law enforcement agencies, SFPD does not require supervisors to verify the completeness and accuracy of stop data.	12
<i>Exhibit 4: Unlike SFPD, other law enforcement agencies require supervisors to help ensure data integrity.</i>	<i>13</i>
Finding 1.4: SFPD does not test stop data to identify potential data reliability issues, increasing the risk of reporting inaccurate information to the Attorney General and local policymakers.	16
<i>Exhibit 5 – SFPD can perform tests to identify potential issues that could undermine the reliability of stop data.</i>	<i>17</i>
Finding 1.5: SFPD does not require officers to link stop data to other records, hindering the efficient identification of unreported stops.	18
Finding 2: SFPD provides training and guidance, but strengthening these efforts can further support data reliability.	20
Finding 2.1: SFPD's training video focuses on data entry, but additional context on the department's data usage could help incentivize complete and accurate reporting.	20
Finding 2.2: SFPD cannot verify if officers viewed the training video, limiting its ability to ensure that all officers understand how to report data.	22
Finding 2.3: Clearer guidance on RIPA's identity perception requirements could help ensure consistent and reliable reporting.	22

Finding 2.4: SFPD’s ability to address officer knowledge gaps that could affect data reliability is limited because it does not require analysis of available training data. 24

Exhibit 6: Analysis of RIPA quiz results can identify knowledge gaps that can impact data reliability.
..... 25

Finding 2.5: SFPD’s quiz did not include questions on reporting perceptions, missing an opportunity to reinforce officers’ understanding of RIPA requirements. 26

Finding 3: SFPD’s new data collection system offers potential to streamline reporting and improve analysis, but the department must take steps to ensure data integrity and process efficiency. 27

Finding 3.1: System transition issues resulted in validation errors and incomplete records that can impact the reliability of 2023 stop data. 27

Exhibit 7: The number of SFPD’s stop data records with errors and omissions increased after its transition to a new system. 28

Exhibit 8: Errors and omissions can undermine the reliability of SFPD’s 2023 stop data. 29

Finding 3.2: SFPD could use data generated by the Benchmark Stop Data System to help evaluate process efficiency and understand how it impacts data reliability. 31

Finding 3.3: Integrating the Benchmark Stop Data System with dispatch and records management systems could help SFPD streamline reporting and improve data accuracy. 32

Key Terms 34

Appendix A: Examples of Tests That SFPD Can Perform to Identify Potential Issues with Data Accuracy and Completeness 37

Test 1: SFPD can test data to detect “zero-stop” days, which may identify potential errors or inconsistencies in data collection. 37

Exhibit 9: In 2022, “zero-stop” days ranged from 11 in the Southern District to 139 in the Park District. 37

Exhibit 10: There was a significant increase in days without reported stops across SFPD districts from 2018 to 2022. 38

Test 2: SFPD can cross-check stop data with other data sources to help check for the submission of all stops. 38

Exhibit 11: Comparing the number of traffic stops in dispatch records and stop data reveals differences across SFPD districts. 39

Exhibit 12: Multi-year analysis shows consistent discrepancies between dispatch records and stop data. 39

Test 3: SFPD can test stop data to identify potential misrepresentations in officers’ reporting of race. 40

Exhibit 13: The number of individuals reported with all seven racial categories is a small percentage of the SFPD's total stops, but significantly increased in 2022..... 40

Appendix B: Examples of DPA Investigations Involving Non-Compliance with Data Collection Requirements.....41

Appendix C: Sworn Member Survey on Stop Data Collection Practices.....43

Appendix D: Outstanding Prior Recommendations52

Appendix E: Cal DOJ's Response to DPA Regarding Logic Checks and Error Validations Performed by the Stop Data Collection System.....53

Appendix F: Audit Objective, Scope, and Methodology.....54

Appendix G: SFPD's Response.....56

Appendix H: DPA Recommendations and SFPD Responses.....59

Background

In 2023, a Department of Police Accountability (DPA) investigation found that an officer repeatedly misreported the race of individuals stopped. Members of the San Francisco Board of Supervisors and Police Commission questioned whether this was an isolated incident or indicative of a broader issue. The Police Commission specifically asked whether DPA planned to audit the integrity of the San Francisco Police Department's (SFPD) stop data.

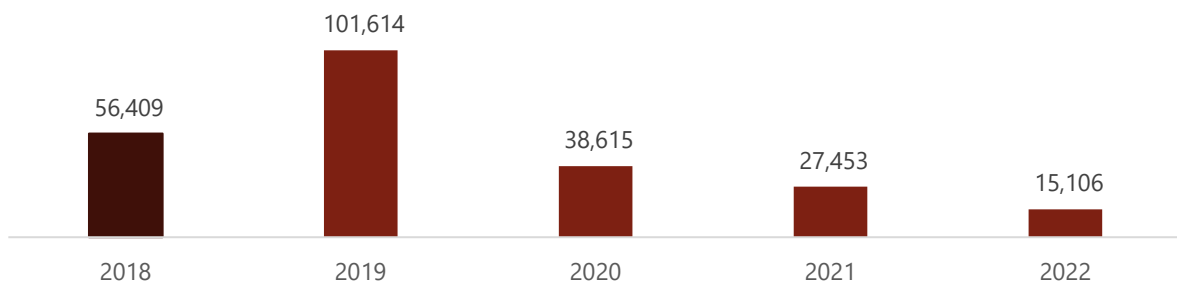
California Assembly Bill 953, the [Racial and Identity Profiling Act of 2015 \(RIPA\)](#), requires state and local law enforcement agencies to annually report stop data to the Attorney General.

- ♦ A "stop" is any detention by a peace officer of a person, or any peace officer interaction with a person in which the officer conducts a search.
- ♦ "Stop data" refers collectively to the data elements and data values that must be reported, including the time, date, and location of the stop, the reason for and result of the stop, and the perceived race or ethnicity of the person stopped.

Exhibit 1 shows SFPD's stops reported to the Attorney General from 2018 to 2022.¹

Exhibit 1: Stops reported by SFPD to the California Attorney General.

SFPD began reporting stop data to the Attorney General on July 1, 2018.



Note: As of August 2024, the California Department of Justice (Cal DOJ) has not yet made available the number of stops for 2023.

Source: RIPA Board annual reports and report appendices.

San Francisco Administrative Code also requires SFPD to report stop data quarterly to the Mayor, the Board of Supervisors, the Police Commission, and the Human Rights Commission.

¹ California Code of Regulations, Title 11, Section 999.224 refers to the California Department of Justice and the California Attorney General interchangeably.

In 2016, the U.S. Department of Justice recommended improvements to both SFPD’s stop data collection and its auditing processes.

The U.S. Department of Justice’s Office of Community Oriented Policing Services (COPS Office) issued *Collaborative Reform Initiative: An Assessment of the San Francisco Police Department*. This report contained findings related to racial disparities in SFPD’s stops and made recommendations for improving SFPD’s stop data collection.

The COPS Office also found that internal audits and inspections were “essentially non-existent” and recommended that SFPD prioritize auditing to ensure organizational accountability and risk management.

Functions within SFPD’s Strategic Management Bureau are responsible for auditing stop data.

SFPD’s Strategic Management Bureau is led by a civilian executive director who reports to the Chief of Police. This bureau includes the Professional Standards and Principled Policing Unit (PSPP), which contains the Business Analysis Team and Staff Inspection Unit. A civilian PSPP program manager also manages the Business Analysis Team.²

The Business Analysis Team geocodes, geo-anonymizes, and removes personally identifiable information from stop data. It also gathers data for the Staff Inspection Unit’s audits. Despite SFPD’s policy and its statements to Cal DOJ about auditing stop data fields for consistency, the Staff Inspection Unit focuses on resolving unfinished stop data reports.³ Exhibit 2 shows how the Staff Inspection Unit’s audits differ from both the COPS Office’s guidance to SFPD and department policy.

Exhibit 2: SFPD’s stop data audits do not align with COPS Office guidance or the department’s own policy.

COPS Office Guidance to SFPD	The COPS Office stated that the purpose of auditing is to determine whether officers submit data for all targeted stops and whether forms are completed fully and accurately.
SFPD Policy	SFPD policy requires annual audits to identify “inconsistent” stop data entries. While not defined in the policy, SFPD told Cal DOJ that “consistency” occurs when stop data narrative fields align with the reasons the officer selected for the stop and search.
SFPD’s Actual Practice	In practice, SFPD does not check for consistency. Instead, the Staff Inspection Unit follows up with officers to resolve existing, unfinished stop data reports.

Source: Auditor generated based on review of the COPS Office’s *An Assessment of the San Francisco Police Department*, SFPD’s Collaborative Reform Initiative packet for COPS Office recommendation 33.1, SFPD Staff Inspection Unit Order 21-01, *Recurring Data Audit*, and interviews with SFPD personnel.

² SFPD, *Staffing Analysis of the San Francisco Police Department*, 2023.

³ In 2018, SFPD and Cal DOJ signed a memorandum of understanding for Cal DOJ to serve as the independent third-party reviewer of SFPD’s implementation of the COPS Office’s recommendations.

In June 2023, SFPD transitioned to the Benchmark Stop Data System for collecting stop data.

Previously, SFPD used Cal DOJ's Stop Data Collection System web-based application. SFPD policy stated that the transition to the Benchmark Stop Data System aimed to streamline data collection and analysis. SFPD is responsible for addressing COPS Office recommendations on analyzing stop data to identify and address officer biases. SFPD stated that the Cal DOJ application did not capture the level of detail necessary to address these recommendations. It stated that Benchmark Analytics agreed to build the Benchmark Stop Data System for the department.^{4,5}

Reliable stop data builds public trust and increases public safety.

This audit evaluates the effectiveness of SFPD's processes for ensuring the completeness and accuracy of stop data. Racial and identity profiling erodes trust in law enforcement. Data collection is critical for developing solutions to end profiling. The Racial and Identity Profiling Advisory Board (RIPA Board), established by the Attorney General, relies on uniform, accurate data to recommend policies and develop training to eliminate this practice.

SFPD aims to use data to measure performance and increase accountability.⁶ With lower staffing levels, law enforcement agencies must increase efficiency, directing limited resources to strategies proven to increase safety and reduce crime. A high degree of data integrity is essential for SFPD to use stop data to evaluate operational effectiveness, efficiency, and equity.

COPS Office-supported guidance provides law enforcement agencies, government officials, and communities with practices for ensuring the integrity of stop data.

In 2020, the Policing Project at New York University School of Law and the Center for Policing Equity released *Collecting, Analyzing, and Responding to Stop Data: A Guidebook for Law Enforcement Agencies, Government, and Communities* (Stop Data Guidebook). The guidebook, developed in collaboration with Cal DOJ, provides practices for ensuring data integrity.⁷ The Center for Policing Equity specifically recommended that SFPD implement the recommendations for RIPA compliance outlined in the guidebook.⁸

⁴ The Benchmark Stop Data System is a software-as-a-service application developed by Benchmark Analytics. SFPD's contract with Benchmark Analytics states that the company's platform provides "a single source to track and manage all data associated with a police department's human capital."

⁵ SFPD stated that Benchmark Analytics is not contracted with the department to build a stop data collection form. It stated that other contracted deliverables will use stop data, and that Benchmark Analytics offered to build a stop data collection system for SFPD for free.

⁶ SFPD, *Strategy 1.0*, 2018.

⁷ The Center for Policing Equity is an organization that produces analyses identifying and reducing the causes of racial disparities in law enforcement. The Policing Project at New York University School of Law partners with communities and police to promote public safety through transparency, equity, and democratic engagement.

⁸ Center for Policing Equity, *The Science of Justice: San Francisco Police Department National Justice Database City Report*, August 2020.

Finding 1: SFPD resolves unfinished reports but must expand audits to ensure that stop data are complete and accurate.

Key Points:

- ♦ SFPD’s audits focus on resolving unfinished stop reports, an approach that does not ensure data integrity. The audits do not consider the risk of unreported stops, or the possibility of errors or intentional misstatements in reports. As a result, SFPD cannot rely on its audits to ensure officers report stops consistently, accurately, and in compliance with data collection requirements.
- ♦ SFPD’s decision not to require supervisor review of stop data does not align with best practice and the approaches of other law enforcement agencies. Supervisor reviews could provide SFPD with a systematic and proactive way to ensure data integrity. Without supervisor reviews, inconsistent or inaccurate data collection may go undetected.
- ♦ SFPD does not test stop data to identify potential data integrity issues. An important step in assessing data reliability is testing for accuracy and completeness. Unreliable data can lead to inaccurate assessments of SFPD’s effectiveness in implementing and sustaining reforms intended to increase public trust through improvements in community policing practices, transparency, and accountability.

Finding 1.1: SFPD’s audits do not address risks to data integrity, including unreported stops and inaccurate reports.

SFPD’s audits focus on resolving unfinished stop data reports.⁹ While this practice helps ensure data completeness, it does not address other key components of data integrity.¹⁰ This approach limits SFPD’s ability to identify data collection issues like unreported stops, errors, and intentional misstatements.

The Stop Data Guidebook states that data integrity for stop reports has three components:

- ♦ Data are collected for each encounter subject to reporting.
- ♦ The data collected for each encounter are complete.
- ♦ The data collected for each encounter are accurate.

⁹ That is, those with a status of “Ready for Submission” or “In Progress.” “Ready for Submission” means that all data are entered, but the report was not submitted to Cal DOJ. “In Progress” means an officer partially completed a report. See Key Terms for additional definitions relevant to this audit.

¹⁰ SFPD reported auditing 242 records from 2020 to 2022. These audited records account for less than one percent of the total stops SFPD reported to the Attorney General during that period.

Exhibit 3 summarizes the effectiveness of SFPD’s audits in ensuring these components.

Exhibit 3: SFPD’s audits do not ensure key components of data integrity.

Data Integrity Component	SFPD’s Audits	Impact on Data Integrity
Data are collected for each encounter subject to reporting.	⚠	SFPD’s audits address unfinished reports. This approach overlooks the risk of unreported stops. If officers do not initiate reports, those stops remain outside the dataset. As a result, SFPD’s stop data can still be incomplete, even if officers finish existing reports.
The data collected for each encounter are complete.	✘	SFPD’s audits do not check that each field in the system is completed. The Cal DOJ Stop Data Collection System web application previously used by SFPD includes built-in error validation, preventing users from accessing the next screen until the current screen is completed accurately. However, in 2023, SFPD transitioned to the Benchmark Stop Data System, which resulted in an increase in errors or omissions (see Finding 3.1).
The data collected for each encounter are accurate.	✘	SFPD’s audits do not verify accuracy, which can allow errors or intentional misstatements to go undetected.

⚠ = Partially ensure, ✘ = Do not ensure

Source: Auditor generated.

An Officer’s Perspective

One officer’s statement underscores the need for SFPD’s audits to consider the risk of unreported stops:

“Nobody does it. The complexity and hoops you run thru to complete one entry simply has the result that most people don’t do it unless there is a in custody arrest [sic].”

Fifty-three percent of survey respondents (49 of 92) believe the requirement to enter stop data is “somewhat” or “very” consistently followed across all SFPD bureaus, divisions, or units.

Source: To understand officer perspectives on SFPD’s processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

Cal DOJ states that it is the responsibility of reporting agencies to include audit and improvement loops to ensure data integrity and accountability. SFPD cited capacity constraints within the Staff Inspection Unit as a reason why audits focus solely on record submission status. It stated that the department’s staffing shortage required the reassignment of Staff Inspection Unit officers to field duties. It also noted that one of the two officers assigned to the unit retired and was not replaced. The Staff Inspection Unit sergeant stated that, in addition to stop data, he is responsible for other audits and has only one analyst assisting him.

SFPD's strategic plan calls for using data to measure performance. Expanding audit scope could provide SFPD with assurance officers report stops consistently, accurately, and in compliance with data collection requirements. Ensuring consistent and accurate reporting could help maintain the integrity of data SFPD needs to better serve the community and increase accountability.

RECOMMENDATION

1. The San Francisco Police Department should expand the scope of stop data audits to include accuracy and completeness checks. If Staff Inspection Unit resources are limited, the department should consider using non-sworn personnel or external auditors to increase capacity.

Finding 1.2: SFPD lacks a mechanism to ensure the timely completion of reports, increasing the risk of delayed submissions that can compromise data accuracy.

SFPD lacks a mechanism to ensure the timely submission of stop data reports. As noted in [Finding 1.1](#), SFPD's audits focus on unfinished reports. However, these audits do not ensure the timely completion of reports. For example, at the start of the audit for 2022, the 93 unfinished reports were, on average, over five months old. Delays in completing reports can affect data integrity, as officers might struggle to recall information accurately over time and as the number of their interactions increases.

RIPA regulations require officers to complete stop reports by the end of their shift, except in exigent circumstances. This requirement is also in SFPD's stop data collection policies.

The Stop Data Guidebook recommends implementing an automated notification system when an officer does not submit a stop report within the required time. However, SFPD does not have such a system. SFPD stated that it did not consider changes to the audit process, such as automating follow-up on unfinished reports, during the transition to the Benchmark Stop Data System. SFPD stated that it focused on system implementation and data transition to meet the department's reporting requirements.¹¹

The lack of a mechanism to ensure timely report completion can hinder SFPD's ability to ensure data integrity. Implementing automated notifications to remind officers and their supervisors about unfinished reports could help SFPD ensure timely reporting and the reliability of data the department needs to measure performance.¹² Automating reminders could also create efficiencies that enable SFPD to reallocate Staff Inspection Unit and Business Analysis time to other tasks that improve data integrity, such as audits that check the accuracy and completeness of stop data or testing stop data for potential reliability issues.

¹¹ See [Finding 3.1](#) for more information on SFPD's transition to the Benchmark Stop Data System.

¹² In June 2024 (outside of the audit period) the Strategic Management Bureau emailed sworn members stating that SFPD plans to automate closeout reminders for members who initiate but do not complete a stop entry.

RECOMMENDATION

2. The San Francisco Police Department should establish a mechanism, such as automated notifications, to ensure timely report completion.

Finding 1.3: Unlike other law enforcement agencies, SFPD does not require supervisors to verify the completeness and accuracy of stop data.

SFPD does not require supervisors to verify the completeness and accuracy of stop data. Without supervisor review, SFPD misses an opportunity to ensure data integrity and support the department's commitment to accountability. Inconsistent data collection and/or inaccurate entries could go undetected, undermining the reliability of data that SFPD could use to develop leadership, training, and policy interventions.

The Stop Data Guidebook states that achieving data integrity requires a concerted effort from the entire law enforcement agency. It states that supervisors must take steps to ensure that officers consistently and accurately collect stop data.

Other law enforcement agencies with similar or higher stop numbers require supervisors to help ensure data integrity.¹³ Exhibit 4 compares the requirements of the Los Angeles, Sacramento, San Diego, and San Mateo police departments with those of SFPD.

¹³ Adopted in February 2024, DGO 9.07, *Restricting the Use of Pretext Stops*, requires supervisory review of stop data. However, it does not require supervisors to verify the completeness and accuracy of the data.

Exhibit 4: Unlike SFPD, other law enforcement agencies require supervisors to help ensure data integrity.

Police Department	2022			Supervisor Review Required?
	Sworn Members	Calls for Service	Reported Stops	
San Francisco	2,023	428,066	15,106	✗
Los Angeles	9,215	828,411	331,148	✓
Sacramento	700	363,322	40,614	✓
San Diego	1,896	499,256	96,119	✓
San Mateo	116	65,527	15,685	✓

✗ = Not required, ✓ = Required

Notes: As of September 2024, Cal DOJ has not published 2023 stop data. Sworn Members and Calls for Service provides context on the size and workload of these law enforcement agencies.

Source: Auditor generated. Stop data for 2022 is from the RIPA Board 2024 Annual Report Appendix Tables. The Sacramento Police Department’s calls for service are from its Crime Analysis Unit. The San Diego Police Department’s calls for service are from DataSD. The San Mateo Police Department’s calls for service are from its records supervisor. SFPD’s calls for service are from its January 13, 2023, budget presentation to the Police Commission. SFPD sworn members are from its June 13, 2022, *Department Statistics Report*. LAPD’s sworn members and calls for service are from its 2022 Use of Force Year-End Review. DPA made public records requests to obtain the number of sworn members for the other agencies.

The supervisor involvement required by the Los Angeles, Sacramento, San Diego, and San Mateo police departments aligns with the Stop Data Guidebook guidance. For example:

- ◆ The Los Angeles Police Department requires supervisors to review forms to ensure proper completion. Supervisors must also review the “Reason for Stop” and the “Basis for Search” fields to ensure a legal basis is adequately articulated and that no identifying information, like the person’s name, are included.¹⁴
- ◆ The Sacramento Police Department requires supervisors to review stop data reports generated by the department’s RIPA coordinator and address any incomplete or missing entries. Supervisors must ensure that officers complete missing RIPA entries during their next shift.¹⁵

¹⁴ Los Angeles Police Department, Department Manual, Volume 4, Line Procedures, 2023.

¹⁵ Sacramento Police Department, General Order 210.09, RIPA Compliance, October 2023.

- ♦ The **San Diego Police Department** requires supervisors and command staff to audit collected data to ensure RIPA compliance. For example, sergeants must **audit RIPA entries** for two squad members on a rotating basis monthly. As part of these inspections, **sergeants review officers' arrest or detention reports, noting and addressing any discrepancies**. Sergeants must also provide a verbal briefing to the next-level supervisor to determine if there are ongoing issues that need additional corrective action.¹⁶
- ♦ The **San Mateo Police Department** requires supervisors to **review each stop data field for completeness and accuracy**. Sergeants are expected to **perform weekly audits** of entries for their regularly assigned officers to ensure compliance with policy requirements. Lieutenants are expected to check with their sergeants monthly to confirm that audits are being conducted, to identify any necessary corrective actions, and to **identify and address pervasive issues or trends**.¹⁷

Cal DOJ believed that supervisor reviews would help SFPD ensure timely error correction and eliminate biased policing. However, in February 2021, Cal DOJ reported that SFPD “resisted” its recommendation to institute supervisor reviews of stop data out of concerns about the impact on sergeants’ time.¹⁸ SFPD stated that, in 2018, command staff determined that sergeants were administratively overburdened, making stop data review untenable. SFPD also cited operational challenges at the time of Cal DOJ’s recommendation, such as inconsistent supervisory assignments, which made this type of review impractical. It also expressed concerns about how supervisors would document and resolve any stop data findings.

SFPD relies on audits and officer compliance instead of supervisor reviews.

In 2018, SFPD informed officers that their compliance with stop data collection requirements could help the department avoid mandatory supervisor reviews of entries.¹⁹

Cal DOJ noted that SFPD’s auditing approach, created as an alternative to supervisor review, does not ensure timely corrections or provide feedback to the officers that generate stop data.²⁰

¹⁶ San Diego Police Department, Training Bulletin 19-03, *Auditing RIPA Data Collected by Department Members*, January 2019.

¹⁷ San Mateo Police Department, Policy 388, *Racial and Identity Profiling Act of 2015 (AB 953) RIPA*, 2023.

¹⁸ Cal DOJ response to SFPD’s completion memorandum for COPS Office recommendation 33.1, February 2021. In this response, Cal DOJ cited SFPD’s “consistency” audits as an alternative approach. Although Cal DOJ stated this was not their preferred approach, it found SFPD to be substantially compliant with this recommendation. See Background and Finding 1.1 for more information on SFPD’s audits.

¹⁹ *Department Bulletin 18-247, Stop Data Collection System Implementation*, December 2018.

²⁰ Cal DOJ response to SFPD’s completion memorandum for COPS Office recommendation 34.1, January 2021.

DPA investigations have identified multiple instances of non-compliance with stop data collection requirements, including failures to report stops and the intentional misreporting of race.²¹

SFPD personnel emphasized that reporting stops is required by department policy and state law, and that officers are expected to comply. One representative stated that DPA investigations could help mitigate risks of non-compliance.²² However, without wider efforts to support officer understanding and acceptance of data collection, using disciplinary procedures to motivate officers' compliance may increase resistance.²³ Supervisor reviews could provide a systematic and proactive approach for ensuring data integrity before issues escalate to a misconduct investigation.

Cal DOJ's Stop Data Collection System web application allows agencies to review records prior to submission. SFPD stated that it chose not to include a review workflow in the Benchmark Stop Data System due to supervisors' other responsibilities, such as reviewing use of force incidents and incident reports. SFPD stated that it will implement dashboards to enable supervisors to monitor stop data in aggregate. The department believes this approach eliminates the need for supervisor review of individual entries. However, SFPD's contract with Benchmark Analytics states that these dashboards will alert supervisors to indicators of officer bias, not issues related to officer compliance with data collection requirements.

The Stop Data Guidebook acknowledges that reviewing data will always impose some additional administrative burden; however, it states that it is essential and should be viewed as a core law enforcement activity, not an optional component of data collection.²⁴ To mitigate this burden, the guidebook suggests that agencies ask sergeants to conduct spot-checks of stop data against various records—such as arrest reports, field interview cards, and dispatch or body-worn camera logs—depending on the systems that are in place. Such reviews may also help SFPD identify and correct errors in reports, ensuring that the data in the dashboards is reliable.

²¹ See Appendix B for more information.

²² SFPD's Internal Affairs Division stated that there have been no department investigations involving stop data, only those sustained by DPA.

²³ Open Society Justice Initiative, *The Recording of Police Stops: Methods and Issues*, 2020. As noted in Finding 2.1, SFPD's training video does not explain SFPD's use of the data.

²⁴ The Stop Data Guidebook acknowledges that auditing will create an administrative burden, particularly on first-level supervisors who will likely bear the brunt of this responsibility. It states that agencies can automate pieces of the review process, such as notifying supervisors when officers do not submit stop data forms within the required timeframe. As noted in Finding 1.2, SFPD's does not have automated notifications to help ensure the timely completion of reports.

RECOMMENDATION:

3. The San Francisco Police Department should formally reassess the feasibility of supervisor reviews to help verify the integrity of stop data. This assessment could explore:
 - a. Automating the supervisor review process within the Benchmark Stop Data System.
 - b. Integrating stop data reviews into other, already existing supervisor review workflows.
 - c. The potential for department dashboards to alert supervisors of data integrity issues like unreported stops.
 - d. Lessons learned from other law enforcement agencies that require supervisory reviews.
 - e. The potential for a pilot program to gather data on the feasibility of supervisor reviews and their impact on data integrity.

Finding 1.4: SFPD does not test stop data to identify potential data reliability issues, increasing the risk of reporting inaccurate information to the Attorney General and local policymakers.

In 2016, the COPS Office provided SFPD with guidance on how to check for missing data and errors. However, despite this guidance, SFPD stated that it does not test stop data to assess reliability. As a result, SFPD risks reporting inaccurate and incomplete stop data to the Attorney General, and in quarterly reports to the Mayor, Board of Supervisors, Police Commission, and Human Rights Commission. Unreliable data can result in inaccurate assessments of SFPD's effectiveness in implementing and sustaining reforms intended to increase public trust through improvements in community policing practices, transparency, and accountability.

Testing data for accuracy and completeness is an important step in assessing data reliability.²⁵ The Stop Data Guidebook states that audits should detect larger patterns indicative of potential data collection issues. It also states that law enforcement agencies should have explanations or resolutions for any unusual patterns in the data before conducting analysis.

An Officer's Perspective

One officer noted that unreported stops can result in incomplete data and invalid analysis:

"Your data and any analysis is invalid based on the fact that no one does the stops. So your data to analyze isn't representative of the stops being done."

Source: To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

²⁵ GAO, *Assessing Data Reliability*, 2019.

Exhibit 5 provides examples of tests that SFPD could perform to identify potential issues that could undermine the reliability of its stop data.

Exhibit 5 – SFPD can perform tests to identify potential issues that could undermine the reliability of stop data.

These tests indicate potential data reliability issues but do not definitively show underreporting or misrepresentation.

Testing Method	2022 Results	Data Reliability Implications
Zero-Stop Days Examining days with no recorded stops across police districts.	Zero-stop days ranged from 11 in the Southern District to 139 in the Park District.	“Zero-stop” days may reflect legitimate decreases in activity due to shifts in enforcement priorities or changes in department staffing. Patterns of missingness can also indicate reporting issues. SFPD’s audits do not address risks to data integrity caused by unreported stops (see Finding 1.1).
Comparison with Dispatch Records Cross-checking stop data with dispatch records to verify all stops are submitted.	Dispatch data shows 10,483 traffic stops, whereas SFPD’s stop data shows 6,662—a difference of 3,821 records.	A discrepancy indicates the potential for underreported data. In addition to not addressing the risk of unreported stops through its audits, SFPD does not require officers to link stop data to dispatch records, limiting the department’s ability to identify the sources of this difference (see Finding 1.5).
Misrepresentation of Race Analyzing entries where officers select all seven racial categories for an individual.	Twelve officers reported all seven racial categories for a single individual in 111 stops. This represents less than 1% of SFPD’s total stops and 28% of all individuals reported as having two or more races.	Cal DOJ noted that entries where an officer selects all seven racial categories can be called into question because it is not likely an honest recording of the officer’s actual perception of the person stopped. Some officers might need additional guidance on recording perception data, since SFPD does not address the nuances of reporting perceptions within its policies (see Finding 2.3) or training (see Finding 2.1 and Finding 2.5).

Note: See Appendix A for the results of these tests for the years of 2018 through 2022.

Source: Auditor analysis of 2022 stop data published on DataSF. DPA did not independently verify SFPD’s geocoding of stop location.

SFPD stated that the Business Analysis Team lacks the capacity to perform analysis that could identify issues with data reliability in SFPD's quarterly reports. The U.S. Government Accountability Office (GAO) states that management should externally communicate the necessary quality information to achieve its objectives.²⁶ As noted in Finding 1.1 and Finding 1.3, SFPD does not ensure the integrity of stop data through audits or supervisor reviews. Routine testing to identify and address potential data reliability issues could help SFPD ensure the accuracy and completeness of information in its quarterly reports.

RECOMMENDATION

4. The San Francisco Police Department should regularly test stop data to identify and resolve potential data reliability issues. If this is not possible due to department capacity constraints, consider partnering with external organizations to perform data reliability testing.

Finding 1.5: SFPD does not require officers to link stop data to other records, hindering the efficient identification of unreported stops.

SFPD does not require officers to link stop data to other department records.²⁷ This limits the department's ability to efficiently identify the sources of discrepancies detected through dataset comparisons. For example, Finding 1.4 noted a difference of approximately 3,800 records between dispatch and stop data records. While this comparison reveals a difference, it cannot tell if officers did not submit data for each encounter subject to reporting.

An Officer's Perspective

Drawing on their experience at another agency, one officer noted that, without data linkage, there is potential for underreporting in SFPD's stop data:

"At my other agency, any [Computer Aided Dispatch] involving a detained person would show whether stop data was collected...I would not be shocked if there was a significant amount of [stop data] entries that are missing because there is no oversight. If you want accurate reporting for the department, there needs to be something in place to assure every detention has a [Benchmark Stop Data System] report."

Source: To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

²⁶ GAO, *Standards for Internal Control in the Federal Government*, 2014. Quality information is from relevant and reliable data that is appropriate, current, complete, accurate, accessible, and provided on a timely basis, and meets identified information requirements.

²⁷ In June 2024 (outside of the audit period) the Strategic Management Bureau emailed sworn members stating that SFPD will add a required field to the Benchmark Stop Data System for a dispatch number.

U.S. Department of Justice guidance suggests linking collected data to dispatch records to help ensure accuracy. Since officers typically notify dispatch about stops, these records can serve as a reliable source for verifying stop data.²⁸

Unlike SFPD, other law enforcement agencies require officers to link stop data to other records.

- ◆ The **San Diego Police Department links stop data to arrest and detention records.** It requires officers to document within each arrest or detention report that they submitted a RIPA entry.²⁹ This practice supports supervisor review requirements (see [Finding 1.3](#)).
- ◆ The **Sacramento Police Department links stop data to dispatch records.** It requires officers to inform dispatch whether a RIPA entry will be made, and the inclusion of these remarks on the dispatch record.

The Stop Data Guidebook recommends that agencies assign a unique identifier to link officers to specific stops. However, SFPD stated that the officer identifiers in stop data do not match those in other department records, and that linking stop data to other records is possible but requires manually cross-checking multiple data points, such as the officer's name, incident location, and approximate time of an encounter.

SFPD noted that the Benchmark Stop Data System enables it to add fields beyond what RIPA requires. However, SFPD stated that it decided not to add a dispatch number field to the Benchmark system during the initial rollout because it prioritized reducing system performance issues and getting data to help analyze disparities in enforcement patterns at both the aggregate and individual officer levels. It also noted that the additional field would increase the time required to enter stop data. Automating the linkage between stop data and other activity records, such as dispatch, could reduce data entry burden, minimize data entry errors, and provide SFPD with efficient way to verify data integrity.³⁰

RECOMMENDATIONS

5. The San Francisco Police Department should link stop data to other department records to facilitate checks on stop data completeness and accuracy. Consider automating the linkage to minimize the data entry burden on officers.

²⁸ U.S. Department of Justice, *A Resource Guide on Racial Profiling Data Collection Systems: Promising Practices and Lessons Learned*, 2000.

²⁹ San Diego Police Department, *Procedure 4.01: Legal - Stop/Detention and Pat Down Procedures*, 2021.

³⁰ See [Finding 3.3](#) for additional information on how SFPD could streamline data collection and ensure data accuracy through system integration.

Finding 2: SFPD provides training and guidance, but strengthening these efforts can further support data reliability.

Key Points:

- ♦ SFPD's data collection training video focuses on the technical steps required to complete a report in the Benchmark Stop Data System. However, it does not connect the data's use to the department's safety goals. If officers do not understand the data's value and relevance for safety efforts, they may have little incentive to ensure its integrity.
- ♦ SFPD's policies lack explicit guidance on when officers should form their perceptions of individuals stopped. This can result in inconsistent demographic data that could undermine the reliability of analyses on racial and identity-based disparities.
- ♦ SFPD's policies do not directly address the distinction between misperception and knowingly providing false information, missing an opportunity to clarify reporting expectations and ensure data integrity.

Finding 2.1: SFPD's training video focuses on data entry, but additional context on the department's data usage could help incentivize complete and accurate reporting.

In June 2023, SFPD issued a training video providing officers with instructions for completing a report in the Benchmark Stop Data System. The video also provides information on department-mandated data collection requirements and modifications from the state's web application.³¹ However, the video does not directly connect the use of the data to the department's safety goals.³² For example, the video explains SFPD's requirement to collect residency information, noting that this is necessary because comparing stop data to census data can be misleading, as not all individuals stopped reside in the city. It does not explain how SFPD will use residency information to develop or refine safety strategies. Communicating how stop data supports public safety strategies could help SFPD incentivize officers to enter data correctly and honestly.

³¹ Department Notice 23-108, *Transition to the Benchmark Stop Data System*, June 2023.

³² Most respondents (66 of 91, or 73%) indicated that they are "extremely" or "somewhat" confident using the Benchmark Stop Data System. However, 44% (40 of 91) indicated that they are "very" or "somewhat" satisfied with SFPD's training videos. See Appendix C.

The Stop Data Guidebook notes the importance of officers at every level understanding why data collection is useful. To help ensure data quality, the COPS Office states that law enforcement leadership should focus on the value and relevance of the data for safety purposes and for accomplishing the agency's mission.³³

An Officer's Perspective

SFPD's strategic plan emphasizes using data to better serve the community and increase transparency and accountability. However, one officer's response indicates a disconnect between the department's goals and those tasked with data collection:

"Not important to officers. This data collection is for state and local mandatory reporting purposes. Allows for [non-law enforcement] personnel to knit pick [sic] everything police do, to justify their opinion on policing. That's really all this is for."

Source: Anonymous survey respondent. To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

One SFPD representative stated that the training video focused on the technical steps of data collection to prevent reigniting internal debates about RIPA's requirements. He noted that discussing the data's benefits with officers is challenging, as the results in the RIPA Board's reports are often perceived negatively by the public. Another representative noted that the video attempts to provide context, but some officers push back because they do not understand why SFPD collects this data.³⁴

The COPS Office notes that officers may resent data collection for various reasons, including when they believe it is just a set-up to show they engaged in racial profiling.³⁵ If officers do not buy into data-driven strategies, they may have little incentive to ensure the data's accuracy and completeness. However, stop data can enable agencies to make deliberate decisions about deploying resources, such as assessing whether enforcement at specific locations improved traffic safety or whether stops impacted short- or long-term crime levels. Training that connects RIPA and SFPD reporting requirements to departmental goals could improve data quality and help officers understand how it supports community safety through effective resource allocation.

RECOMMENDATION

6. The San Francisco Police Department should update the training video to connect RIPA's requirements to departmental goals and demonstrate how stop data helps improve public safety. If updating the video is not feasible, SFPD should develop alternative methods to communicate the value and relevance of data collection in achieving the department's mission.

³³ COPS Office, *Law Enforcement Best Practices: Lessons Learned from the Field*, 2019.

³⁴ SFPD policy states that the Cal DOJ course *Reporting Stop Data for RIPA (AB 953)* is available for members seeking further context or information. However, SFPD's Training Division stated that, as of May 2024, no officers have attended this course.

³⁵ COPS Office, *How to Correctly Collect and Analyze Racial Profiling Data*, 2006.

Finding 2.2: SFPD cannot verify if officers viewed the training video, limiting its ability to ensure that all officers understand how to report data.

SFPD cannot verify if officers viewed the mandatory training video referenced in Finding 2.1. As a result, it cannot ensure that all officers received the necessary instruction on using the Benchmark Stop Data System.

SFPD policy required officers to view the training video by their first day of work on or after June 28, 2023.

An Officer's Perspective

Despite required training, one officer's statement indicated confusion about what data needs to be entered into the Benchmark Stop Data System:

"Mandatory fields only accept certain information/characters, and it is not clear what I am required to enter."

Source: To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

A videographer from SFPD's Media Relations Unit indicated that the video hosting platform used by the department tracks overall views but does not identify which specific officers watched the video. SFPD stated that its electronic document management system can track individual officer engagement with the video. However, the department did not upload the video to this platform. This missed opportunity hinders SFPD's ability to monitor compliance with this training requirement.

RECOMMENDATION

7. The San Francisco Police Department should implement a mechanism to verify that officers view mandatory stop data training videos.

Finding 2.3: Clearer guidance on RIPA's identity perception requirements could help ensure consistent and reliable reporting.

SFPD's policies lack specific guidance on when officers should form perceptions of individuals' identities during stops, as well as how to handle potential misperceptions. Using stop data to identify disparate treatment among individuals relies on honest reporting by officers, with records reflecting their initial perceptions. The absence of direct guidance on perception timing increases the risk that officers across the department may record perception data inconsistently.

In addition, without direct guidance on misperception, SFPD misses opportunities to emphasize Cal DOJ's position that knowingly reporting false information is unlawful, and to clarify whether officers will face discipline for a mistake of fact regarding a person's perceived demographic information. Inconsistent or dishonest reporting could impact data integrity and SFPD's ability to draw reliable conclusions from data analysis.

An Officer's Perspective

One officer described challenges with perception-based reporting:

"The perceived category also isn't clear when my 'perception' should be. Is it when I initiate the stop, when I make contact, or following my stop? If I pull you over for tinted windows at nighttime depending on when that 'perception' occurs my answer changes."

Source: To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

The RIPA Board states that profiling occurs because of how people perceive others and act based on that perception. RIPA regulations require officers to record their perceptions based on observation and prohibit verification through other means like asking the person or checking identification. **In December 2018, Cal DOJ issued guidance stating that an officer's perception must be based upon whatever point in the encounter the officer is able to make such an observation. The guidance also explains that misperception is a mistake of fact regarding a person's perceived demographic information, and that a perception is only "wrong" if it does not reflect the officer's actual perception.**³⁶

SFPD provided a link to Cal DOJ's guidance in one of its stop data-related policies, referring to it as "additional information" without further instruction. SFPD chose not to integrate Cal DOJ's guidance directly within its policies, citing concerns about interpreting RIPA's regulations. In contrast, the San Mateo Police Department incorporates Cal DOJ's guidance on the timing of perception-based data within its policies, demonstrating that it is possible to assist officers on this issue without superseding the law.

The RIPA Board notes that it is a routine part of an officer's job to make perceptions, like when an officer makes a stop based on a suspect description. Without clear guidance, officers may feel uncertain about when to record their perceptions or worry about potential repercussions if there is a mistake in perception information. Incorporating Cal DOJ's guidance on perception into SFPD policy could promote consistent, honest data collection and support data integrity.

³⁶ Cal DOJ, *Racial and Identity Profiling Act Questions and Answers*, December 2018.

RECOMMENDATION

8. The San Francisco Police Department should consider integrating the California Department of Justice's guidance on perception within its policies.

Finding 2.4: SFPD's ability to address officer knowledge gaps that could affect data reliability is limited because it does not require analysis of available training data.

In December 2023, SFPD required officers to pass a quiz on RIPA data collection requirements.³⁷ However, despite having officer performance data from these quizzes, SFPD stated that it does not analyze the results to identify areas where officers need further training. These unaddressed knowledge gaps may hinder officers' compliance with stop data collection and reporting requirements, potentially making the data unreliable for analysis.

The Stop Data Guidebook recommends that training focus on problem areas identified through data.

Exhibit 6 provides examples of questions officers answered incorrectly and the potential implications of these knowledge gaps.

³⁷ Department Notice 23-198, *Stop Data Regulatory Update*, December 2023.

Exhibit 6: Analysis of RIPA quiz results can identify knowledge gaps that can impact data reliability.

Question	Possible Answers	Incorrect Response Rate	Potential Impact of Knowledge Gap on Data Reliability
<p>Scenario: Officer Hughes stops a speeding car and learns the vehicle is stolen. Hughes asks the passenger in the backseat to exit the car so it can be impounded.</p> <p>Would this scenario be reportable with respect to the passenger?</p>	<p>a) Yes,</p> <p>b) No</p>	42%	<p>Inaccurate reporting of the number of individuals stopped in multi-person encounters.</p> <p>This can impact reporting and analysis of the number of individuals stopped and any actions taken.</p>
<p>Scenario: Officer Lambert sees a car with a broken taillight and attempts to pull the car over at 21st and P Street. The car pulls to the side of the road, but after a few seconds the driver takes off and Officer Lambert pursues. The chase ends at the intersection of Garden Highway and Levee Road when the car runs out of gas. Officer Lambert removes the driver from the vehicle, searches him, and places him under arrest.</p> <p>Which location should the officer report as the location of the stop?</p>	<p>a) 21st & P Street,</p> <p>b) Garden Highway and Levee Road</p>	38%	<p>Location data may not accurately reflect where stops occur.</p> <p>This can hinder SFPD's ability to assess the effectiveness of enforcement in particular locations.</p>
<p>Which data element is NOT collected by DOJ as part of the RIPA mandate?</p>	<p>a) Date of stop,</p> <p>b) Perceived age,</p> <p>c) Reporting officer's name and badge number,</p> <p>d) Reason for stop</p>	34%	<p>Indicates a lack of understanding of RIPA's key provisions.</p> <p>As noted in Finding 2.1, SFPD's training video focuses on data entry procedures. This could indicate a need for training that goes beyond data entry.</p>

Note: The next frequently missed question (10% incorrect) asked whether an encounter with a passenger is reportable when the vehicle is not impounded.

Source: DPA analysis of 1,279 RIPA quizzes completed in 2023.

SFPD policy did not assign responsibility to any person or unit for analyzing the quiz results. SFPD stated that it does not require additional training for officers who miss questions. Although individual follow-up is not required, department-wide performance analysis would enable SFPD to identify topics or scenarios where officers demonstrate knowledge gaps. SFPD could use this information to develop training materials or guidance to address these gaps and improve data integrity.

RECOMMENDATIONS

9. The San Francisco Police Department should assign responsibility for analyzing RIPA quiz results and use the analysis to address common knowledge gaps among officers.

Finding 2.5: SFPD's quiz did not include questions on reporting perceptions, missing an opportunity to reinforce officers' understanding of RIPA requirements.

SFPD's RIPA quiz did not include questions related to reporting perceptions of individuals' identities. This omission is a missed opportunity to assess officers' understanding of this key aspect of data collection and to reinforce the importance of reporting perceptions, even if those perceptions are a mistake of fact.

The Stop Data Guidebook recommends that agencies address the nuances of policies in training, including the factor of perception.

SFPD's 10-question quiz addresses aspects of RIPA's regulations other than officer perception. SFPD stated that it developed the quiz using questions from the Cal DOJ's POST training course. **However, SFPD did not include Cal DOJ's scenario-based question on perception.**

Cal DOJ provides a scenario-based question to guide officers on reporting perception.

The scenario is presented as follows:

Scenario: Officer Davis radios in "eyes on a Hispanic male, 20's, appears to be acting as a lookout..." Officer Davis then stops the person and runs their name for any warrants. The officer then learns the person is a White female, age 30.

Question: What perception information should the officer report?

Source: Cal DOJ, *Reporting Stop Data for RIPA – Amended Regulations*.

The Stop Data Guidebook also includes a scenario-based question on what race to report when an officer's perception changes during an interaction. Incorporating such examples into training could help SFPD ensure that officers consistently report data that reflects their actual perception of a person stopped.

RECOMMENDATION

10. The San Francisco Police Department should include scenario-based questions addressing identity perception in future RIPA quizzes. If SFPD does not intend to develop future RIPA quizzes, it should consider alternative ways to reinforce officers' understanding of RIPA requirements.

Finding 3: SFPD’s new data collection system offers potential to streamline reporting and improve analysis, but the department must take steps to ensure data integrity and process efficiency.

Key Points:

- ♦ The number of errors in SFPD’s stop data increased after transitioning to the Benchmark Stop Data System. In 2023, 33% of the 19,280 records submitted by SFPD contained errors or omissions. Nearly all (99%) of these issues occurred after the system transition. Such issues can make SFPD’s data unreliable for analysis and decision-making.
- ♦ System integration could help SFPD streamline reporting and improve data accuracy. SFPD personnel noted that much of the data required for stop reports is already captured in dispatch records and incident reports. Integrating the Benchmark Stop Data System with other systems of record could reduce redundant reporting, allowing officers to focus more on law enforcement and crime prevention activities.

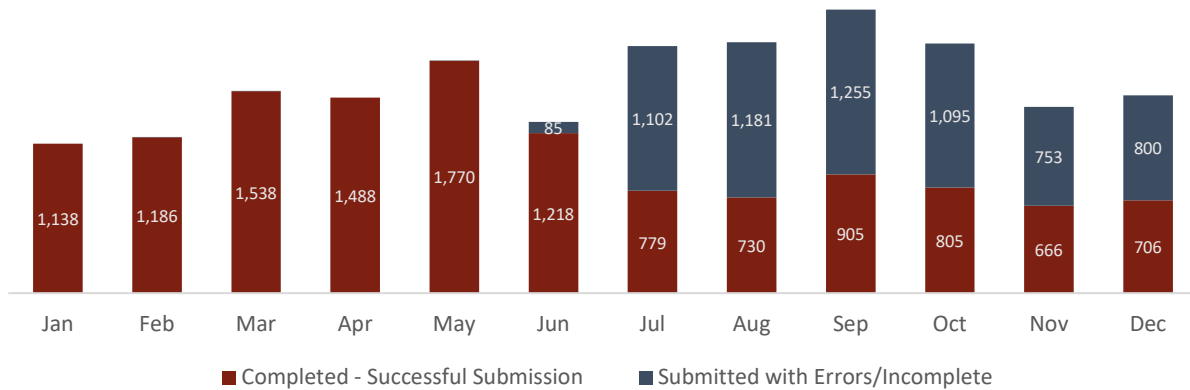
Finding 3.1: System transition issues resulted in validation errors and incomplete records that can impact the reliability of 2023 stop data.

The number of errors in SFPD’s stop data increased significantly following the transition to a new data collection system. In 2023, 6,274 of the 19,280 records (33%) SFPD submitted contained data validation errors or omissions. Almost all (99%) of these issues occurred after the transition to the Benchmark Stop Data System in June 2023.³⁸ Exhibit 7 provides a monthly breakdown of successfully completed stop data records, and those with issues, in 2023.

³⁸ This analysis excludes 327 stop records with “fatal” errors. Because they compromise data integrity, Cal DOJ does not save records with fatal errors to its database.

Exhibit 7: The number of SFPD’s stop data records with errors and omissions increased after its transition to a new system.

The transition to the Benchmark Stop Data System occurred on June 28, 2023. Prior to this, SFPD used Cal DOJ’s Stop Data Collection System web application, which includes built-in error validation. The Cal DOJ application required accurate form completion before submission.



Notes: Cal DOJ states that the “Submitted with Errors/Incomplete” status indicates a validation error in a stop record. For context, there were two records Submitted with Errors/Incomplete in 2022, and none with this status in 2021. This chart excludes stops with a status of “No Further Information Available” (24 stops) and “Deleted” (53 stops). Before June, there were three records with errors—one each in February, March, and May. See Appendix E for Cal DOJ’s response to DPA regarding logic checks and error validations performed by the Stop Data Collection System.

Source: Auditor analysis of stop data records provided by Cal DOJ to SFPD on April 30, 2024.

These records can contain one or more errors. Such errors can threaten data integrity and make the data unreliable for analysis. In 2023, SFPD’s records contained approximately 11,000 errors.

An Officer’s Perspective

One officer provided an example of how system issues can contribute to data entry errors, particularly with offense codes:

“Selecting the offense code can be extremely difficult...If I attempt to type in offense multiple answers auto populate and sometimes they are the incorrect codes and then I cannot locate the correct code.”

Supporting this perspective, most respondents (56 of 90, or 63%) indicated that “daily” or “weekly” technical issues with the Benchmark Stop Data System affect their ability to enter data. Nearly half (43 of 90, or 48%) indicated that SFPD’s technology is the aspect of data collection needing the most improvement.

Source: To understand officer perspectives on SFPD’s processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

Exhibit 8 provides a breakdown of SFPD’s error types and the impact of these errors on the analysis of stop data.

Exhibit 8: Errors and omissions can undermine the reliability of SFPD’s 2023 stop data.

Error Type	Prevalence	Potential Impact
<p>Incorrect or Missing Offense Codes</p> <p>Offense codes, maintained by Cal DOJ, standardize data entry across multiple criminal justice applications.</p> <p>RIPA regulations require officers to report offense codes that indicate the basis and results of the stop (e.g., a code identifying the type of traffic violation).</p>	4,870 records, or 64% of all errors	<p>May impact the assessment of SFPD General Order 9.07, Restricting the Use of Pretext Stops.</p> <p>The Police Commission used offense code data to develop DGO 9.07, which will take effect in July 2024. If 2023 stop data are used as a baseline, errors and omissions may complicate assessments of the policy’s effectiveness in reducing stops that it characterizes as low-level offenses that disproportionately affect people of color and return negligible public safety benefits.</p>
<p>Missing Narratives</p> <p>RIPA regulations require officers to provide a brief explanation about the reason for the stop and, if applicable, the basis for the search.</p>	1,885 records, or 21% of all errors	<p>Limits insights into officer decision-making in high discretion stops and searches.</p> <p>Missing narratives can reduce the usefulness of the data for research and policy development.</p>
<p>Invalid Data Combinations</p> <p>Conflicting information within records. For example, selecting “None” for “Contraband/Evidence Discovered” while also reporting the basis for the property seizure as contraband.</p>	499 records, or 5% of all errors	<p>Unreliable contraband yield rate.</p> <p>Conflicting information within records can complicate analysis, undermining the reliability of the search and seizure rates SFPD provides in its quarterly reports.</p>

Note: This table does not include all the errors in SFPD’s 2023 records. Other errors include officer years of service (7%), missing or invalid perceived age of the person stopped (2%), and those in the reported duration and location of the stop (both 1%).

Source: Auditor analysis of data by Cal DOJ to SFPD on March 31, 2024.

SFPD stated that addressing these errors delayed quarterly reports and diverted staff resources from a use-of-force data project. One representative added that SFPD submits data annually, and did not make corrections to the submitted data before the state’s deadline.³⁹ RIPA regulations state that reporting agencies must ensure that all data elements, values, and narrative explanatory fields conform to the regulations. The regulations also require agencies to correct any errors in the data submission process. Cal DOJ encourages agencies to submit data as frequently as daily, as it allows for the early detection and correction of errors while the memory of the stop is fresh in the officer’s mind.

³⁹ Agencies must submit data to the state annually. The reporting period ends on December 31st of each year. Agencies have until March 31st of the following year to submit data.

SFPD attributed the errors to the system's development. In February 2023, Cal DOJ stated that they provided Benchmark Analytics with the technical data dictionary for the stop data collection system.⁴⁰ SFPD stated that it expected Benchmark Analytics to build the data collection correctly based on this dictionary. However, the SFPD Technology Division project facilitator assigned to Benchmark Stop Data System stated that fields required by RIPA were not marked as required in the system. Additionally, SFPD noted that the system went live with incorrect offense codes.

One SFPD official stated that the department did not allow enough time for system testing before implementation. Approximately one month before the system transition, SFPD emailed 13 individuals asking them to ensure the system could handle entries with multiple subjects. However, instructions did not include specific test scenarios or data, and SFPD stated that it did not verify the data entries submitted by these individuals.⁴¹

SFPD stated that it needed the system to go live to begin collecting data for compliance with COPS Office recommendations, with a deadline set for April 2024. It stated that delaying the transition would leave insufficient time to collect data by this deadline. Although this explanation contextualizes the decision to proceed with the system transition in late June 2023, SFPD's approach did not align with guidance offered through the U.S. General Service Administration's *Modernization and Migration Management Playbook* (M3 Playbook).⁴² The M3 Playbook advises agencies to develop a system test plan to validate the application's accuracy and completeness in meeting established requirements. It also calls for developing high-level test scenarios, using test data, and defining the roles and responsibilities for those involved in the testing.

RECOMMENDATIONS

The San Francisco Police Department should:

11. Implement controls within the Benchmark Stop Data System to prevent invalid data combinations and ensure complete stop data.
12. To help ensure the early detection and correction of errors, adjust its data submission schedule to align with the California Department of Justice's recommendation for more frequent reporting.
13. Develop a structured testing protocol for all future system updates. The protocol should outline test execution activities, utilize scenarios that reflect real-world use cases, and define the roles and responsibilities all individuals involved in testing.

⁴⁰ RIPA regulations require Cal DOJ to publish a data dictionary and interface specifications to ensure uniform and complete reporting of stop data.

⁴¹ The instructions asked, but did not require, users to test the system on department cell phones. SFPD's Chief Information Officer stated that the system was not built for mobile device use.

⁴² U.S. General Services Administration, *Modernization and Migration Management Playbook*, 2016. The playbook provides guidance, tools, and templates to help agencies in planning for and navigating transitions.

Finding 3.2: SFPD could use data generated by the Benchmark Stop Data System to help evaluate process efficiency and understand how it impacts data reliability.

The Benchmark Stop Data System generates data that can provide insights into the time officers spend completing stop reports. This gives SFPD the opportunity to evaluate the efficiency of its data collection process and quantify the time burden on officers.^{43,44}

DPA's analysis of Benchmark system data found that, in 2023, SFPD officers needed a median of five minutes to complete a report, with times decreasing from seven minutes in June to four minutes in December.⁴⁵ The COPS Office states that officers may resent data collection if they feel it detracts from their ability to perform their duties properly.⁴⁶ Respondent burden—which includes the time required to generate information—can impact both the quality and quantity of data collected. If officers perceive data collection as burdensome, they may report stops inconsistently or inaccurately, which would compromise the reliability and usefulness of the data for analysis.

An Officer's Perspective

One officer noted the time burden that data collection imposes:

"It is such a laborious process! At an average of about 4 minutes per entry, an active officer will spend 60-90 minutes per shift complying with this policy."

The majority of survey respondents (71 of 91, or 78%) indicated that collecting stop data "moderately" or "significantly" hinders their ability to perform other duties.

Source: To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

The Stop Data Guidebook states that agencies should feel empowered to collect additional data that they consider relevant. However, it cautions that doing so comes with a tradeoff: the more comprehensive the data, the more time officers spend collecting it. The GAO recommends that management establish baselines and monitor the internal control system to address risks, achieve objectives, and improve operating effectiveness.

Prior to the audit, SFPD did not have access to data related to report completion. Analyzing this data can help SFPD quantify the time burden on officers and take steps to minimize it, aligning with

⁴³ At the September 20, 2023, Police Commission meeting, SFPD cited stop data collection as administrative work contributing to a decrease in citation issuance.

⁴⁴ Benchmark Analytics does not track "active time" in its system. Consequently, if a user starts a report but completes it later, the recorded time may reflect delays rather than actual completion time. As noted in Finding 1.2, SFPD does not have a mechanism to ensure that officers submit reports timely.

⁴⁵ DPA analyzed 11,108 stop data reports completed in 2023, including the records with errors described in Finding 3.1.

⁴⁶ COPS Office, *How to Correctly Collect and Analyze Racial Profiling Data*, 2006.

Administrative Code requirements to maximize officers' time on law enforcement and crime prevention.⁴⁷ In Finding 1.5, SFPD stated that it chose not to add a dispatch number field to the Benchmark form during rollout, citing concerns about data entry time. Completion time data could provide an informed basis for such decisions. In addition, tracking completion time may help SFPD support a claim for cost recovery. The San Diego Police Department reported 2.5-minute median completion time, which the City of San Diego used in its reimbursement claim for RIPA implementation costs to the California Commission on State Mandates.⁴⁸

RECOMMENDATIONS

14. The San Francisco Police Department should use Benchmark Stop Data System's capability to track the start and submission times of reports to establish baselines for report completion and use the analysis to identify trends and opportunities for process improvement.

Finding 3.3: Integrating the Benchmark Stop Data System with dispatch and records management systems could help SFPD streamline reporting and improve data accuracy.

Although SFPD's contract with Benchmark Analytics states that the platform can integrate with dispatch and records management systems, the department stated it has not implemented these integrations for stop data collection. The lack of system integration may create inefficiencies and increase the risk of errors in the collection process because officers must manually enter data into the Benchmark system.

An Officer's Perspective

One officer noted the potential benefits of system integration:

"If stop data could be pulled directly from [Computer Aided Dispatch] or [Crime Data Warehouse] instead of requiring a separate application, it would be much easier, and you would achieve much higher compliance."

Source: To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. See Appendix C for more information.

⁴⁷ San Francisco Administrative Code Section 96I.2, *Improving the Efficiency and Effectiveness of the Department*, effective April 2024. Although the Code exempts tasks required by law, SFPD added fields to the Benchmark Stop Data System—beyond RIPA's requirements—aimed at facilitating more comprehensive analysis and better understand the factors driving disparities.

⁴⁸ State of California Commission on State Mandates, Case Number 18-TC-02, filed by the City of San Diego on June 14, 2019.

The U.S. Department of Justice recommends leveraging existing systems, like dispatch or citation systems, to minimize data collection burdens.⁴⁹ Similarly, the Stop Data Guidebook calls for integrating stop data collection with existing systems to facilitate auto-population and minimize copying errors. In addition, San Francisco's Administrative Code requires the Police Commission and SFPD to minimize redundancy and administrative tasks in record keeping and reporting.⁵⁰

An SFPD manager stated that, ideally, the Benchmark Stop Data System could auto-populate all fields except officer perception data, including stop locations from dispatch records and actions taken from incident reports. Another representative recognized the benefits of integration for streamlining data entry but noted that SFPD already requested proposals for a new report-writing system prior to the implementation of the Benchmark Stop Data System. SFPD's Technology Division acknowledged officers' requests for dispatch system integration but explained that there are no plans to integrate it with Benchmark Stop Data System because the dispatch system is scheduled for replacement by 2026.

Integrating the Benchmark Stop Data System with other SFPD systems, such as dispatch, could facilitate supervisor review processes (see Finding 1.3). For example, an integrated system could potentially generate reports when there are discrepancies between stop data and dispatch records, prompting supervisor follow-up and reducing the risk of unreported stops. Guidance from the M3 Playbook recommends conducting integration testing to ensure that system components interact and pass data as expected. This testing can help SFPD ensure that future Benchmark system integrations function as intended, supporting data accuracy so that SFPD can effectively use its data for strategic planning, problem-solving, and performance measurement.⁵¹

RECOMMENDATION

15. The San Francisco Police Department should, in conjunction with the implementation of the new dispatch and records management systems, formally plan and assess the feasibility of integrating them with the Benchmark Stop Data System. Planning should focus on opportunities to improve reporting efficiency while ensuring data accuracy.

⁴⁹ U.S. Department of Justice, *A Resource Guide on Racial Profiling Data Collection Systems: Promising Practices and Lessons Learned*, 2000.

⁵⁰ San Francisco Administrative Code Section 96I.2, *Improving the Efficiency and Effectiveness of the Department*, effective April 2024. Officers may already rely on dispatch records to complete their stop data reports. For example, during a ride-along with SFPD's Southern District station, an officer stated that it is common practice to enter information from the dispatch history into the Benchmark Stop Data System at the end of a shift. This officer stated that completing stop data reports on department-issued cell phones or on the patrol vehicle computer is impractical.

⁵¹ U.S. Department of Justice, COPS Office, *Community Policing Defined*, 2014.

Key Terms

These terms are defined to help in understanding this audit and are not intended to be comprehensive definitions or applied outside the scope of this audit report.

Benchmark Stop Data System – As of June 28, 2023, the system SFPD uses to collect stop data.

Business Analysis Team – Located within SFPD’s Professional Standards and Principled Policing Unit, the Business Analysis Team’s responsibilities include providing data analysis and generating various mandated reports to federal, state, and local officials.

California Department of Justice (Cal DOJ) – The California Constitution establishes the Attorney General as the state's chief law officer, responsible for ensuring that the laws of the state are uniformly and adequately enforced. The Attorney General fulfills these responsibilities through the California Department of Justice.

Center for Policing Equity – A research organization that partners with law enforcement agencies and communities to conduct analysis and make recommendations to promote better practices. It partnered with SFPD to analyze the department’s policing practices. This partnership resulted in the 2020 report *The Science of Justice - San Francisco Police Department National Justice Database City Report*.

Computer Aided Dispatch (CAD) – The San Francisco Department of Emergency Management operates the 9-1-1 Call Center and CAD System. CAD records are created as a result of calls from the public or from public safety personnel in the field (known as “On-View” calls). Each call, whether from the public or On-View, is assigned a unique CAD number.

Data – Information that is entered, processed, or maintained in a data system, generally organized in, or derived from, structured computer files (i.e., datasets).

Data Element – A category of information that peace officers must report regarding a stop. For example, “perceived gender of person stopped” is a data element that must be collected under California Government Code Section 12525.5.

Data Integrity – In the stop data context, data integrity has three components:

- ♦ Data are collected for each encounter subject to reporting.
- ♦ For each encounter, the data collected are complete.
- ♦ For each encounter, the data collected are accurate.

Data Reliability – Data that are reasonably free from error and bias and faithfully represent what they purport to represent.

Data Validity – Recorded transactions that represent events that actually occurred and were executed according to prescribed procedures. Cal DOJ provides a central data validation service to ensure that all stop data are validated using a single consistent methodology.

Data Value – A component or characteristic of a data element. For example, "Cisgender man/boy," "Cisgender woman/girl," "Transgender man/boy," "Transgender woman/girl," and "Nonbinary person" are each data values to use in reporting the data element "perceived gender of person stopped."

Fatal Error – An error that occurs when the stop data record cannot be saved without compromising the integrity of the Cal DOJ's database.

Office of Community Oriented Policing Services (COPS Office) – A component of the U.S. Department of Justice responsible for advancing the practice of community policing by the nation's state, local, territorial, and tribal law enforcement agencies. In 2016, the COPS Office issued *Collaborative Reform Initiative: An Assessment of the San Francisco Police Department*. This report resulted in 94 findings and 272 recommendations to SFPD.

Professional Standards and Principled Policing Unit (PSPP) – Members of PSPP work with internal and external stakeholders to update policies, implement policy changes and initiatives, and work with leadership to determine strategic goals and annual initiatives.

Racial and Identity Profiling Act of 2015 (RIPA) – RIPA requires law enforcement agencies to report data to the California Attorney General's Office on all vehicle and pedestrian stops and citizen complaints alleging racial and identity profiling. It also required the Attorney General to establish the Racial and Identity Profiling Advisory Board.

Racial and Identity Profiling Act Board (RIPA Board) – A 19-member board consisting of law enforcement, attorneys, community and spiritual leaders, and a university professor. The board reviews and analyzes stop data and issues an annual report with policy recommendations for eliminating racial and identity profiling in law enforcement.

San Francisco Police Commission (Police Commission) – The body empowered to prescribe and enforce the rules and regulations that it deems necessary to ensure the efficiency of the San Francisco Police Department.

San Francisco Police Department (SFPD) – The department responsible for preserving the public peace, preventing and detecting crime, and protecting the rights of persons and property by enforcing the laws of the United States, the State of California, and the City and County of San Francisco.

Staff Inspection Unit – Located within the Professional Standards and Principled Policing Unit, the Staff Inspection Unit monitors compliance with the department's policies and procedures.

Strategic Management Bureau – The SFPD bureau responsible for implementing tools and organizational change while integrating change initiatives into the SFPD's strategic frameworks.

Stop – Any detention of a person by a peace officer, or any peace officer interaction with a person in which the officer conducts a search.

Stop Data – Collectively refers to the data elements and data values that law enforcement agencies must reported to the California Attorney General.

Stop Data Collection System – A system that includes the web-based application hosted by Cal DOJ and provided to law enforcement agencies to facilitate the collection of the stop data.

Stop Data Record Status – The statuses for stop records. These include:

- ◆ **Completed – Successful Submission** – This status means the stop data record was successfully submitted to Cal DOJ.
- ◆ **In Progress** – This status indicates the record is partially recorded but not completed.
- ◆ **No Further Information Available** – This status indicates the record is incomplete because the officer cannot recall the details of the stop.
- ◆ **Ready for Submission** – This status indicates that all of the data elements were entered but the stop record was not submitted to Cal DOJ.
- ◆ **Submitted with Errors /Incomplete** – This status indicates the record has a validation error.

U.S. Government Accountability Office (GAO) – The audit, evaluation, and investigative arm of Congress. The GAO publishes *Standards for Internal Control in the Federal Government*, which local governmental entities can adopt as a framework for an internal control system.

Yield Rate – The percentage of searches that result in the discovery of contraband.

Appendix A: Examples of Tests That SFPD Can Perform to Identify Potential Issues with Data Accuracy and Completeness

An important step in assessing data reliability is testing for accuracy and completeness. However, as noted in Finding 1.4, SFPD does not test stop data to identify potential data reliability issues. As a result, SFPD risks reporting inaccurate and incomplete stop data to Attorney General, as well as in quarterly reports to the Mayor, Board of Supervisors, Police Commission, and Human Rights Commission.

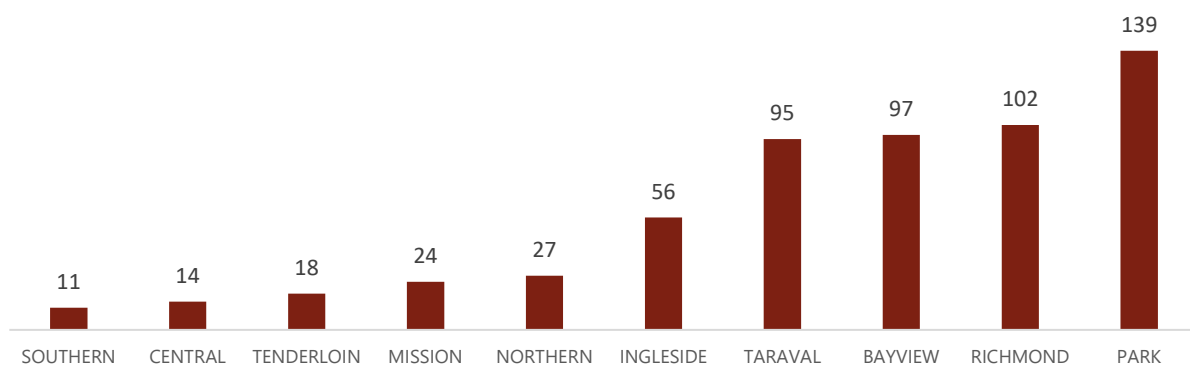
Unreliable data can result in inaccurate assessments of SFPD’s reform efforts, ineffective policies, and weaken accountability and transparency. The following are examples of tests that SFPD can perform to identify potential issues with data reliability.

Test 1: SFPD can test data to detect “zero-stop” days, which may identify potential errors or inconsistencies in data collection.

Analysis to detect “zero-stop” days—days with no recorded stops—can identify potential data reliability issues.

In 2022, every SFPD district had days without reported stops. As shown in Exhibit 9, the number of days without reported stops ranged from 11 in the Southern District to 139 in the Park District.

Exhibit 9: In 2022, “zero-stop” days ranged from 11 in the Southern District to 139 in the Park District.



Notes: This analysis excludes stops characterized as “Airport” and “Out of Town/Unknown.” The analysis includes only stops with a status of “Completed – Successful Submission.” SFPD geocodes and adds the district field to stop data on DataSF to indicate the police district of the stop location. The DataSF explainer states that geographic information is provided to help users understand the distribution of stops across districts. DPA did not independently verify SFPD’s geocoding of stop location.

Source: Auditor analysis of stop data published by SFPD on DataSF.

Exhibit 10 shows the number of days with no reported stops across SFPD districts increased from 2018 to 2022. This trend may reflect legitimate decreases in stops due to shifting enforcement priorities, changes in department staffing, or external factors like COVID-19. However, the data can also suggest the possibility of reporting issues. As noted in Finding 1.1, SFPD’s audits focus on resolving unfinished reports, which does not ensure that officers report all required encounters.

Exhibit 10: There was a significant increase in days without reported stops across SFPD districts from 2018 to 2022.

This chart provides the number of days with no reported stops in each SFPD district from 2018 to 2022. Colors range from green to red, with green representing a low number of “zero-stop” days and red indicating a relatively high number.

District	2018	2019	2020	2021	2022
Bayview	-	-	22	29	97
Central	-	-	-	1	14
Ingleside	-	-	16	32	56
Mission	-	-	2	-	24
Northern	-	-	2	15	27
Park	-	1	48	52	139
Richmond	-	-	34	38	102
Southern	-	-	-	5	11
Taraval	-	-	41	44	95
Tenderloin	-	-	4	8	18

Notes: This analysis excludes stops characterized as “Airport” and “Out of Town/Unknown.” The analysis includes only stops with a status of “Completed – Successful Submission.” SFPD geocodes and adds the district field to indicate the police district of the stop location. DPA did not independently verify SFPD’s geocoding of stop location. Cells marked “-” indicate no “zero-stop” days recorded for that year and district.

Source: Auditor analysis of stop data published by SFPD on DataSF.

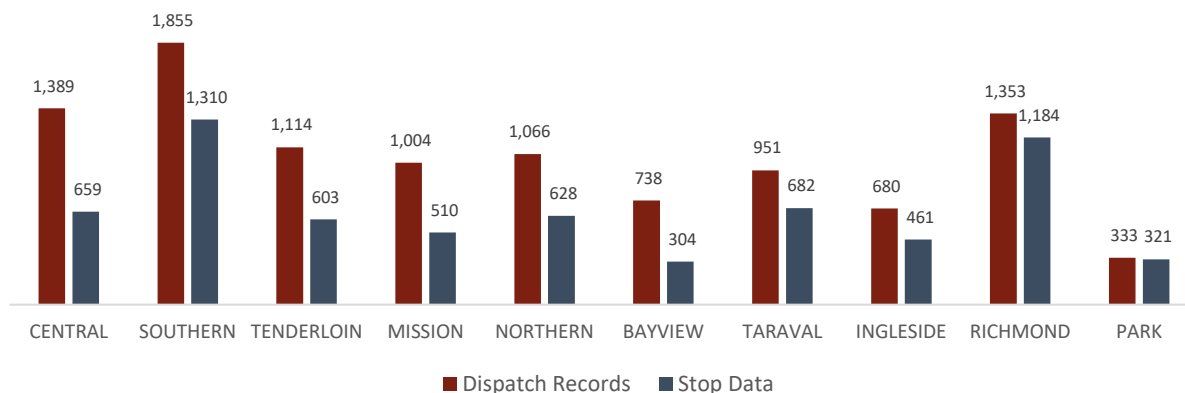
Test 2: SFPD can cross-check stop data with other data sources to help check for the submission of all stops.

In 2016, the COPS Office told SFPD that comparing stop data with secondary data sources, like citations or dispatch records, could help SFPD verify the submission of all stops.

Exhibit 11 compares the number of traffic stops in dispatch records with the number in SFPD’s stop data, for the year 2022.

Exhibit 11: Comparing the number of traffic stops in dispatch records and stop data reveals differences across SFPD districts.

In 2022, SFPD’s dispatch data contains 10,483 traffic stops, while the stop data contains 6,662—a discrepancy of 3,821 records. Discrepancies between the two data sources vary by district, ranging from 12 records in the Park District to 730 in the Central District.



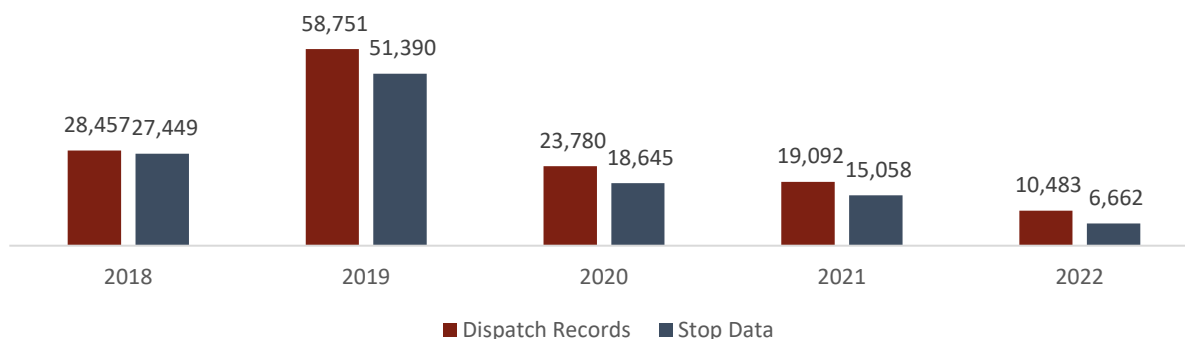
Notes: Traffic violations in stop data include equipment, moving, and non-moving violations (including registration-related stops). Nearly all records in both datasets resulted from “On-View” incidents. This analysis excludes stops characterized as “Airport” and “Out of Town/Unknown.” The analysis includes only stops with a status of “Completed – Successful Submission.” SFPD geocodes and adds the district field to indicate the police district of the stop location. DPA did not independently verify SFPD’s geocoding of stop location.

Source: Auditor analysis of dispatch records and stop data available from DataSF.

Exhibit 12 shows that there are consistent discrepancies between the number of traffic stops in dispatch records and traffic violations reported in stop data.

Exhibit 12: Multi-year analysis shows consistent discrepancies between dispatch records and stop data.

This multi-year analysis reveals a consistent gap between traffic stops recorded in dispatch data and those reported in stop data. Each year, the number of stops in dispatch records exceeds those in stop data.



Notes: Traffic violations in stop data include equipment, moving, and non-moving violations (including registration-related stops). Nearly all records in both datasets originate from “On-View” incidents. This analysis excludes stops characterized as “Airport” and “Out of Town/Unknown.” The analysis includes only stops with a status of “Completed – Successful Submission.” SFPD geocodes and adds the district field to indicate the police district of the stop location. DPA did not independently verify SFPD’s geocoding of stop location.

Source: Auditor analysis of dispatch records and stop data available from DataSF.

While these comparisons might indicate potential issues, there may also be reasonable explanations. While comparisons reveal differences, they do not indicate whether specific officers, units, or shifts did not submit required stop data. However, as noted in Finding 1.5, SFPD does not require officers to link stop data to other department records, limiting the department’s ability to identify the sources of the discrepancies.

Test 3: SFPD can test stop data to identify potential misrepresentations in officers’ reporting of race.

In 2016, the COPS Office told SFPD that it should examine data elements that officers might intentionally misrepresent, such as race. Cal DOJ noted that entries where an officer selects all seven racial categories can be called into question because it is not likely an honest recording of the officer’s actual perception of the person stopped.

Exhibit 13 shows the number of individuals reported with all seven racial categories from 2018 to 2022. To provide context on the prevalence and potential implications of this reporting practice, the exhibit also presents this data as a percentage of total individuals stopped, as well as a percentage of individuals reported with two or more races.

Exhibit 13: The number of individuals reported with all seven racial categories is a small percentage of the SFPD’s total stops, but significantly increased in 2022.

The number of individuals reported with all seven racial categories is a small percentage of SFPD’s total stops but saw a notable increase in 2022.

Year	Number of Individuals Reported with All Seven Racial Categories	As a Percentage of Total Individuals Stopped	As a Percentage of Individuals Reported with Two or More Races
2018	357	.63%	24.32%
2019	243	.24%	9.79%
2020	60	.16%	7.15%
2021	43	.16%	7.12%
2022	111	.74%	28.17%

Source: Auditor analysis of stop data published by SFPD on DataSF. DPA analyzed stops with a status of “Completed – Successful Submission.”

Cal DOJ acknowledges that a person may have lineage from all seven racial categories but stated that it is unlikely an officer would honestly perceive this during a stop. In 2022, one officer accounted for 65 of the 111 (59%) instances.⁵² Reporting all seven races for an individual can impact analysis, making it difficult to determine whether race factored into stops or actions taken.

⁵² In one stop data report, the officer stated that the victim provided a suspect description as White.

Appendix B: Examples of DPA Investigations Involving Non-Compliance with Data Collection Requirements

DPA investigations have identified multiple instances of non-compliance with data collection and reporting requirements, including failures to report stops and intentional misreporting of race. The following are two separate examples in which DPA found officers that intentionally misrepresented the race of the individuals stopped.

- ♦ **An officer admitted to consistently recording the same race for nearly all individuals in their stop data.** The officer stated they would not determine someone's race, even if ordered, without more information. Over a multi-year period, the officer reported 1,198 stops, recording 1,193 of these individuals as White. When asked if they considered how reporting White would affect the data, the officer responded that they did not care.

The officer also told DPA that they did not contact dispatch when stopping vehicles, resulting in no CAD records of their stops. DPA attempted to validate the officer's stop data against secondary sources, consistent with COPS Office guidance provided to SFPD in its 2016 assessment. However, DPA found that SFPD lacks comprehensive data on officer-issued citations. Specifically, the investigation found that handwritten tickets are sent to the Traffic Division of the Superior Court of San Francisco without being archived by SFPD.

- ♦ **In another investigation, an officer acknowledged a practice of reporting White as the default race of individuals.** This practice was evident in a specific instance where the officer used a crime bulletin as the basis for a stop; the bulletin identified the individual as Black and included their photograph.

In another case, DPA found that an officer did not submit stop data for two separate encounters with the same complainant, stating that they did not believe either encounter was a detention. However, dashcam footage provided by the complainant showed the officer taking actions associated with a stop.

- ♦ **In the first encounter, the footage captured the officer knocking on the complainant's vehicle window, attempting to open the vehicle door, and taking her driver's license.** The officer admitted to DPA that he activated his patrol vehicle lights during this interaction.
- ♦ **In the second encounter, dashcam footage showed the officer stopping and parking beside the complainant's vehicle while she was stopped in traffic. The officer exited their vehicle, knocked on the complainant's window and gestured for her to roll it down.** The officer briefly spoke with the complainant, cursed, and then returned to his vehicle and drove away.

These cases demonstrate the real-world implications of the issues identified in this report.

For example:

- ◆ As noted in [Finding 1.1](#), SFPD's audits focus on resolving unfinished reports, an approach that overlooks the risks of intentional misreporting and unreported stops. The investigations presented above show that these issues can occur within SFPD.
- ◆ [Finding 1.3](#) notes that SFPD does not require supervisors to verify stop data completeness and accuracy. As a result, SFPD risks allowing inaccurate or inconsistent data collection—as seen in these examples—to go undetected.
- ◆ [Finding 1.5](#) notes that SFPD does not require officers to link stop data to other records, like dispatch. This is relevant to the investigation where the officer did not notify dispatch during stops, resulting in no dispatch record of the encounters. Requiring linkage of stop data and dispatch records could have enabled SFPD to detect this practice.
- ◆ [Finding 2.1](#) notes that officers who do not buy into data-driven strategies may have little incentive to ensure the data's accuracy and completeness. This is relevant to the investigation where the officer noted that they did not care about the impact of their reporting on the data.

Appendix C: Sworn Member Survey on Stop Data Collection Practices

To understand officer perspectives on SFPD's processes for stop data collection, DPA distributed an online survey to sworn members. The survey was open from May 9 to May 17, 2024. Participation in the survey was voluntary, responses were anonymous, and DPA allowed respondents to skip questions. DPA received a total of 92 responses, representing approximately 5% of SFPD's 1,845 sworn members in May 2024. While the survey results are not generalizable to all sworn members, the responses provide perspectives on the efficacy of SFPD's stop data collection practices.

C.1: SFPD Stop Data Collection Practices

C.1.1: How clear do you find SFPD's policies on when to collect stop data?

This question focused on Department Notices 23-108 *Transition to Benchmark Stop Data System*, 23-159 *Benchmark Stop Data System*, and 23-198 *Stop Data Regulatory Update*.

Response	Count of Respondents	Percent of Respondents
Very clear	9	10
Clear	45	49
Unclear	21	23
Very unclear	17	18
Total	92	100%

C.1.2: How well-prepared do you feel to implement SFPD's stop data collection policies?

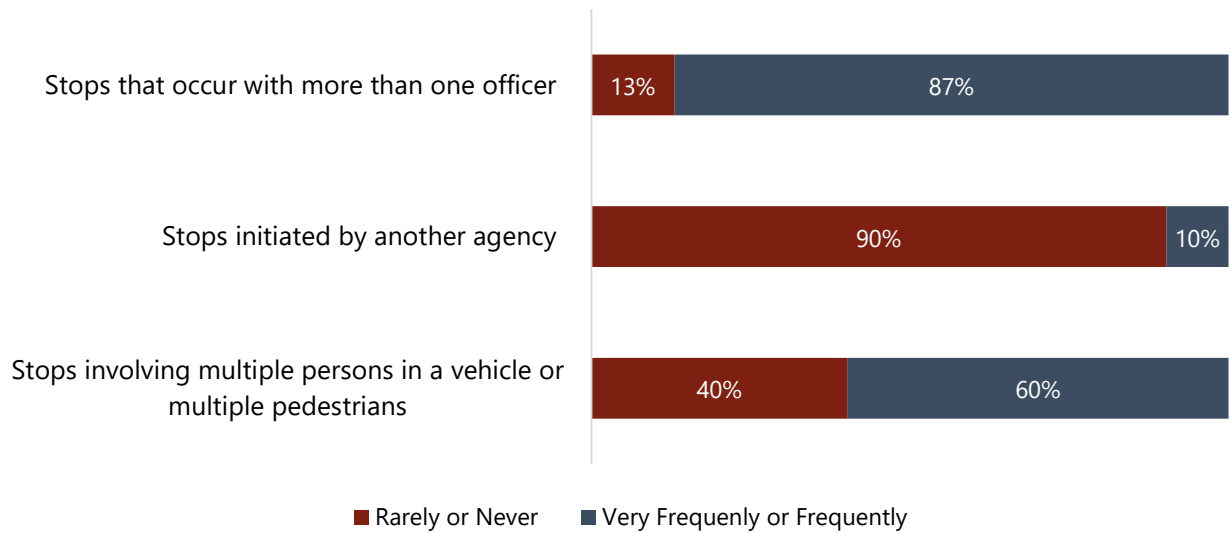
Response	Count of Respondents	Percent of Respondents
Very well-prepared	16	18
Somewhat prepared	38	42
Somewhat unprepared	25	27
Very unprepared	12	13
Total	91	100%

Note: DPA received 91 responses to this question. DPA allowed respondents to skip questions.

C.1.3: How often do you make stops that require you to collect and enter stop data?

Response	Count of Respondents	Percent of Respondents
Daily	42	46
Weekly	28	30
Monthly	5	5
Rarely	15	16
Never	2	2
Total	92	100%

C.1.4: How frequently do you encounter the following scenarios during stop data collection?



Note: DPA received 92 responses for all three scenarios.

C.1.5: How consistently do you believe the requirement to enter stop data into the Benchmark Stop Data System is followed across all SFPD bureaus, divisions, or units?

Response	Count of Respondents	Percent of Respondents
Very consistently	23	25
Somewhat consistently	26	28
Inconsistently	12	13
Very inconsistently	14	15
Unsure	17	18
Total	92	100%

C.1.6: DPA asked officers what specific data points they find particularly challenging to collect.

A total of 66 respondents provided comments. Approximately 30 (45%) of these respondents cited the collection of demographic information. For example:

- ♦ One respondent expressed concern about the requirement to report on the sexual orientation of individuals during routine vehicle stops, stating that it has no relevance to the traffic violation and does not influence decision-making.
- ♦ Another respondent stated it is “difficult or impossible to honestly answer” questions about perceived race, gender, sexual orientation, or disability. The respondent noted the problem with assuming officers can always perceive such characteristics, especially in mixed-race individuals or those whose disabilities and gender identities are not visually apparent.
- ♦ A respondent expressed discomfort with the obligation to guess a person's sexual orientation during brief interactions.

C.2: Benchmark Stop Data System Usability and Training

Questions in this section focused on respondent experiences with SFPD’s stop data collection tool.

C.2.1: How confident are you in your ability to use the Benchmark Stop Data System?

Response	Count of Respondents	Percent of Respondents
Extremely confident	19	21
Somewhat confident	47	52
Not very confident	15	16
Not confident at all	10	11
Total	91	100%

Note: DPA received 91 responses to this question. DPA allowed respondents to skip questions.

C.2.2: How satisfied are you with SFPD's training videos for the Benchmark Stop Data System?

Response	Count of Respondents	Percent of Respondents
Very satisfied	5	5
Somewhat satisfied	35	38
Somewhat dissatisfied	30	33
Very dissatisfied	21	23
Total	91	100%

Note: DPA received 91 responses to this question. DPA allowed respondents to skip questions.

C.2.3: How often do technical issues with the Benchmark Stop Data System affect your ability to enter data?

Response	Count of Respondents	Percent of Respondents
Daily	33	37
Weekly	23	26
Monthly	16	18
Never	18	20
Total	90	100%

Note: DPA received 90 responses to this question. DPA allowed respondents to skip questions.

C.2.4: DPA asked officers to describe technical issues they experienced.

A total of 62 respondents provided comments. Respondents noted concerns about the performance and functionality of the system. For example:

- One respondent stated that the system is slow, with each check box creating a time delay. They stated that the average ten-minute time required for each data entry, coupled with other duties like report writing and booking evidence, contributes to a decrease in arrests and citations.
- Another respondent described the data entry process as "extremely" long and repetitive, with some questions being asked multiple times without clear reason. They characterized the system as inefficient compared to systems used by other departments, which they feel are more efficient and user-friendly.
- A respondent noted the system's slow response times and its lack of integration with other systems like report writing, body-worn camera, or computer-aided dispatch systems.

C.3: Stop Data Collection Impact on Duties

Questions in this section focused on how collecting stop data impacts respondents' day-to-day duties.

C.3.1: How prioritized do you feel stop data collection is within SFPD, relative to your other duties?

Response	Count of Respondents	Percent of Respondents
Highly prioritized	35	38
Somewhat prioritized	28	31
Somewhat deprioritized	13	14
Highly deprioritized	15	16
Total	91	100%

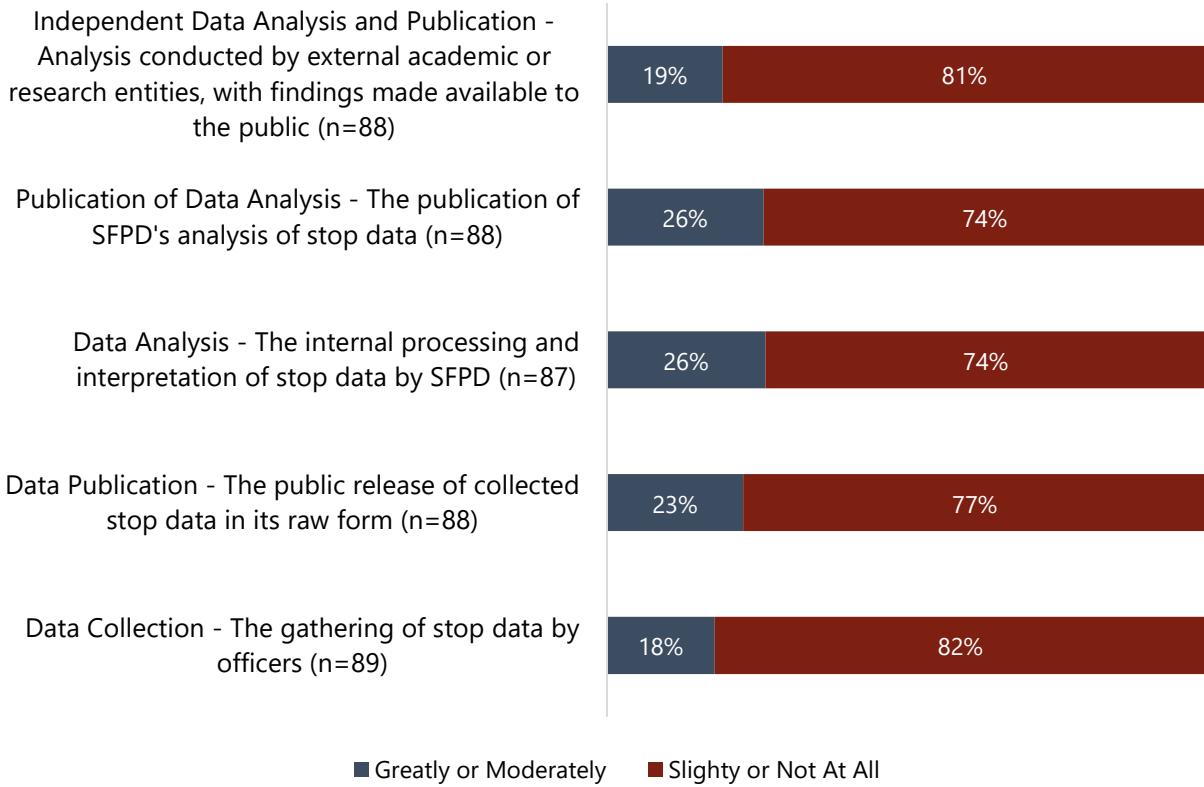
Note: DPA received 91 responses to this question. DPA allowed respondents to skip questions.

C.3.2: To what extent does collecting stop data affect your ability to perform your other duties?

Response	Count of Respondents	Percent of Respondents
No impact	4	4
Slightly hinders	16	18
Moderately hinders	28	31
Significantly hinders	43	47
Total	91	100%

Note: DPA received 91 responses to this question. DPA allowed respondents to skip questions.

C.3.3: In building community trust, to what extent do the following activities contribute:



Note: DPA allowed respondents to skip questions. "n=" is the total number of respondents.

C.3.4: Which aspect of the stop data collection process do you think needs the most improvement?

Response	Count of Respondents	Percent of Respondents
Data collection technology	43	48
Policy guidance	8	9
Training on policies	3	3
No improvements needed	-	-
Other	36	40
Total	90	100%

Note: DPA received 90 responses to this question. DPA allowed respondents to skip questions.

C.3.5: DPA asked officers how SFPD can improve the analysis and reporting of stop data to better support officers.

A total of 63 respondents provided comments. Respondents noted issues with the relevance and impact of the data. For example:

- ♦ One respondent stated that, while the data collected is important, it does not accurately reflect daily street activities and is primarily used by politicians to critique or highlight crime trends, rather than to effectively reduce crime.
- ♦ A respondent expressed skepticism about the utility of the data for front-line officers, suggesting that it is mostly used by higher-ups for presentations and does not influence routine decisions to detain or arrest individuals.
- ♦ A respondent suggested that data should be shared with officers in a format more relevant and accessible than the department's quarterly reports.
- ♦ The respondent feels that the current approach to data analysis is designed to undermine trust and damage the reputation of police officers, rather than support them.

C.4: Open-Ended Questions for Additional Thoughts on SFPD's Stop Data Collection Practices

DPA provided officers with open-ended questions for additional thoughts on SFPD's stop data collection practices.

C.4.1: DPA asked if respondents would like to provide more details about any of their responses to the multiple-choice questions.

The survey gave an opportunity for respondents to provide more details about any of their responses to the multiple-choice questions. A total of 33 respondents provided comments, including those offering insights into the time needed for data collection. For example:

- ♦ A respondent described the data entry process as "laborious." This respondent estimated that, at an active officer might spend up to 90 minutes per shift complying with this policy. This officer stated that this time burden is compounded by body-worn camera metadata tagging and briefings, reducing a 10-hour shift to 6 hours of "active working time."
- ♦ Another respondent acknowledged that data collection is a legal requirement but called the data entry process "too much of a burden." This respondent suggested automation as a solution to achieve full compliance.

C.4.2: DPA asked officers if there was anything we did not ask about SFPD’s stop data collection practices that they thought we should know.

A total of 35 respondents provided comments. Responses reflected a range of officer perspectives on data collection. For example:

- One respondent stated that “no police officer feels like collecting data is, or should be, part of our job, especially when it feels like this data is often twisted and weaponized against us.” This respondent compared requiring an officer to collect data to “asking a jazz musician to write the sheet music for his improvised set.”
- Another respondent appreciated the transition to the Benchmark Stop Data System, highlighting its ability to capture nuanced information about stops compared to the previous system.
- A respondent had concerns that the data is misinterpreted or taken out of context, stating that “often times reports publish only rudimentary data.”

C.5: Reported Bureau Assignments for Survey Respondents

Response	Count of Respondents	Percent of Respondents
Administration	6	7
Airport	2	2
Field Operations	61	69
Investigations	8	9
Other	5	6
Special Operations	7	8
Total	89	100%

Note: DPA received 89 responses to this question. DPA allowed respondents to skip questions.

Appendix D: Outstanding Prior Recommendations

As part of the audit, DPA assessed SFPD's progress in addressing prior recommendations relevant to the audit objective. In August 2020, the Center for Policing Equity recommended that SFPD adopt a single, comprehensive general order to address stop data collection and RIPA compliance.⁵³

SFPD did not implement the Center for Policy Equity's 2020 recommendation to adopt a general order for RIPA data collection requirements.

The Center for Policing Equity noted that SFPD relied on multiple, similarly named department bulletins to communicate data collection requirements. It stated that a general order could enhance SFPD's commitment to fair and equitable policing.

SFPD informed Cal DOJ that it would complete the data collection general order in 2021.⁵⁴ However, this did not occur. SFPD stated that the department is not actively developing the recommended general order.

The Stop Data Guidebook recommends that law enforcement agencies formalize data collection protocols in general orders or a policy manual. The PSPP program manager stated that frequent updates to RIPA's data collection requirements and the lengthy process of creating a general order make department notices a more practical choice. **However, SFPD's approach differs from that of the Sacramento and San Mateo police departments, which have formalized requirements in more permanent formats**—Sacramento through a general order and the San Mateo through its policy manual.

Between 2018 and 2023, SFPD issued four department bulletins and four department notices related to RIPA data collection.⁵⁵

In 2016, the COPS Office found that SFPD used department bulletins as a workaround for the general order approval process. The COPS Office recommended that SFPD limit bulletins to providing short-term direction.⁵⁶

SFPD's **general orders** are authoritative and permanent directives that align the department with legal requirements.⁵⁷ In contrast, **department notices** communicate administrative, legal, policy, or operational changes that take effect immediately but expire every three years.

⁵³ Center for Policing Equity, *The Science of Justice: San Francisco Police Department National Justice Database City Report*, 2020.

⁵⁴ SFPD's response to COPS Office recommendation 31.1, dated January 2021.

⁵⁵ For context, SFPD issued over 200 department notices in 2023 alone, including those on promotional announcements, the use of rental vehicles, and various position openings.

⁵⁶ COPS Office, *Collaborative Reform Initiative: An Assessment of the San Francisco Police Department*, October 2016.

⁵⁷ The August 2019 revision of *DGO 3.01, Written Communication System*, listed department bulletins as a form of written directive. The July 2022 revision to DGO 3.01 no longer includes department bulletins.

Appendix E: Cal DOJ's Response to DPA Regarding Logic Checks and Error Validations Performed by the Stop Data Collection System

Cal DOJ responded to DPA's May 2024 request for information regarding logic checks performed by the state's Stop Data Collection System (SDCS), descriptions of those logic checks, and details about the SDCS error validation process. Cal DOJ provided the following information:

- ◆ **Initial logic checks are performed as part of an automatic process of the SDCS to identify processing errors in the system.** Proprietary application code performs logic and referential checks on the submitted data against each of the validation requirements.
- ◆ Any errors encountered are saved to the database for later processing and reporting, and a **response detailing the encountered errors is returned to the submitting agency** using the same transfer method as the received file/payload.
- ◆ **After the annual April 1st reporting deadline, a secondary set of logic checks reviews are performed.** Department staff review the final submitted data collection for that year and take the results of this second logic check to confer internally with multiple teams and troubleshoot any discrepancies between error counts. These errors are then summarized publicly in the Read Me document that accompanies the final dataset on the Attorney General's OpenJustice public website. **Agencies do not receive direct notification of these errors.**

DPA also asked for data on the errors identified in SFPD's stop data for the years 2021, 2022, and 2023. Cal DOJ provided the following errors from the second logic check process, which occurs after the April reporting deadline:

- ◆ 30 logic check errors for 13,751 stops in 2023.⁵⁸
- ◆ 36 logic check errors for 15,106 stops in 2022.
- ◆ 10 logic check errors for 27,453 stops in 2021.

⁵⁸ The analysis in Finding 3.1 is on record-level data, not the number of stops.

Appendix F: Audit Objective, Scope, and Methodology

Objective & Scope

This audit evaluated the effectiveness of SFPD's processes for ensuring the completeness and accuracy of stop data, from 2018 through 2023.

Methodology

To accomplish our audit objective, we reviewed:

- ◆ Provisions of laws and regulations relevant to stop data collection and reporting, including California Government Code 12525.5 and San Francisco Administrative Code Chapter 96.
- ◆ SFPD's quarterly analysis and data reports.
- ◆ SFPD's contract with Benchmark Analytics, including subsequent contract amendments.
- ◆ SFPD's written directives related to stop data collection and stop data audits.
- ◆ DPA investigations of officer non-compliance with stop data collection requirements.
- ◆ The results of prior engagements relevant to the audit's objective, including recommendations made in the COPS Office's *Collaborative Reform Initiative: An Assessment of the San Francisco Police Department*, and in the Center for Policing Equity's 2020 report, *The Science of Justice: San Francisco Police Department National Justice Database City Report*.

Additionally, we:

- ◆ Issued a survey to sworn members to obtain their perspectives on SFPD's processes related to stop data collection (see [Appendix C](#) for more information).
- ◆ Interviewed staff from SFPD's Strategic Management Bureau, including personnel from the Professional Standards and Principled Policing Unit, Technology Division, Business Analysis Team, and Staff Inspection Unit.
- ◆ Attended the *Reporting Stop Data for RIPA (AB 953)* training course, offered by California POST and presented by Cal DOJ.
- ◆ Watched SFPD's stop data collection training video in Department Notice 23-108 *Transition to Benchmark Stop Data System*.
- ◆ Went on a ride along with an officer from SFPD's Southern Station.

As part of the audit, we assessed internal controls relevant to the audit objective. In performing our work, we identified concerns related to SFPD's control activities, control environment, monitoring, and information and communication.

In performing this audit, we relied on data that we obtained from SFPD, DataSF, and Cal DOJ. To assess the reliability of this data, we conducted interviews with knowledgeable SFPD personnel and assessed relevant documentation to identify potential limitations. Based on our assessment, we determined that the data presented in this report are sufficiently reliable for the purposes of our objective.


Statement of Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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

The San Francisco Charter mandates DPA to regularly audit or review SFPD's use of force and handling of police misconduct. The Charter also gives DPA the authority to conduct performance audits and reviews to check whether SFPD followed all laws, ordinances, and policies. The Charter grants DPA's executive director the discretion to decide the frequency, topics, and scope of the audits and reviews.

Steve Flaherty, Director of Audits

Contact: (415) 241-7711 | sfdpa@sfgov.org
[sf.gov/dpa](https://www.sf.gov/dpa) |  @SF_DPA |  @sf_dpa

Department of Police Accountability
Paul Henderson, Executive Director
1 South Van Ness Avenue, 8th Floor
San Francisco, CA 94103

Appendix G: SFPD's Response



LONDON N. BREED
MAYOR

CITY AND COUNTY OF SAN FRANCISCO
POLICE DEPARTMENT
HEADQUARTERS
1245 3RD Street
San Francisco, California 94158



WILLIAM SCOTT
CHIEF OF POLICE

December 17, 2024

Executive Director Henderson
Department of Police Accountability
1 South Van Ness Ave, 8th Floor
San Francisco, CA 94103

Dear Director Henderson:

RE: SFPD Stop Response

Thank you for assisting the San Francisco Police Department (SFPD) in improving our systems related to Stops data. The auditor of the Department of Police Accountability has been professional and open to understanding the realities of stops data collection, as well as the need and circumstances of the Department.

Of the 15 recommendations made to the SFPD, the Department concurs with 11 and partially concurs with 3. The department concurs with recommendations 2, 4, 5, 7-9, and 10-15, and partially concurs with 1, 3 and 6.

Below, you will find a request for closure of recommendations 2, 5, and 13 and a synopsis of the reasons for partial concurrence with recommendations 1, 3, and 6.

Requested for Closure:

Recommendation 2 notes the department should have a mechanism, like automated reminders, to ensure timely stop entry completion. After the completion of DPA's fieldwork, automated notifications to SFPD members reminding them to complete unfinished stops entries started in October, 2024.

Recommendation 5 states the department should link stop data to other department records. Partial data linkage between CAD and BSDS is complete, with the addition of a CAD number field to the BSDS form as of 6/18/24. In past systems integrations, SFPD has found that *automated* linkages to CAD are unreliable and often requires officers to enter the CAD information anyway. However, the Department of Emergency Management is replacing their CAD system which may change the ability of this information to be added automatically.

SFPD Stop Response
Page 2
17 December 2024

Recommendation 13 notes the department should develop a structured testing protocol for any future system updates. The Department agrees. A project management approach, including structured testing, to major system changes is a necessity. SFPD is unlikely to embark ever again on the breadth and depth of systems' implementations, improvements, and upgrades, as it has in the last two years and into the next five. When another systems launch is impending, a testing phase will be included. Further, a PMP certified project-manager has been assigned to oversee the work being performed with Benchmark.

Recommendations with which SFPD partially concurs:

Recommendation 1 states the department should increase audit scope of stop data to include accuracy and completeness checks, and further notes that if sworn member capacity is not available, the department should utilize non-sworn or external auditors. SFPD generally concurs with the expansion of audit scope, however, the department will continue to be constrained by budget limitations, hiring/contracting process challenges, and constraints surrounding police data. However, as SFPD transitions to a new Records Management System, the Department will be establishing a Data Governance and Integrity Unit to check accuracy and completeness within each of the Incident/Arrest, Stops, and Use of Force data sets. They will also ensure that processes and controls for entry and new data collection efforts are in place. SFPD anticipates that some of these personnel will be in place by the end of 2025.

Recommendation 3 notes the department should conduct a formal reassessment of the feasibility of Sergeants reviewing stop information. Since this recommendation speaks to data accuracy, SFPD has confidence that, given the proper data entry restrictions and logic checks that have been or will be built into the Benchmark stops data collection system, data integrity issues will be nearly nonexistent. Further, with the aforementioned Data Governance and Integrity Unit conducting data validation and other types of accuracy checks, any potential remaining integrity issues will be addressed. Given these two types of internal controls, should the reassessment of supervisory review of stop entries suggest that the administrative burden makes it infeasible given the requirements of Prop E, the Department is confident that the accuracy of these data will be addressed.

Recommendation 6 states the department should connect RIPA data collection requirements to departmental goals to demonstrate how stop data improves public safety. The SFPD concurs that data collection is important for transparency and use in crime fighting and measurement of various interventions, and that this should be communicated to SFPD personnel. However, stops data alone is not as useful for crime fighting and therefore such statements will be included when referencing data collection in general and stops data included among other communications

SFPD Stop Response
Page 3
17 December 2024

regarding data collection important. However, when a training update regarding RIPA or stops data collection is next necessary, the Department will determine if the context of the training lends itself to adding these bigger-picture aspects to the video.

I appreciate the time and effort of you and your staff in completing this audit and I look forward to further discussions at your earliest convenience.

Sincerely,



WILLIAM SCOTT
Chief of Police

Appendix H: DPA Recommendations and SFPD Responses

For each recommendation, DPA asked SFPD to indicate whether it concurs, does not concur, or partially concurs. If SFPD concurs with the recommendation, it should indicate the expected corrective action plan, the person or group responsible for the implementation, and the expected date for completing the plan. If SFPD does not concur or partially concurs, it should provide an explanation and an alternate plan of action to address the identified issue.

The San Francisco Police Department Should:	SFPD Response
<p>1. Expand the scope of stop data audits to include accuracy and completeness checks. If Staff Inspection Unit resources are limited, the department should consider using non-sworn personnel or external auditors to increase capacity.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>SFPD generally concurs with the expansion of audit scope, however, the department will continue to be constrained by budget limitations and hiring/contracting process challenges. SFPD transitions to a new Records Management System, the Department will establish a Data Governance and Integrity Unit to check accuracy and completeness within each of the Incident/Arrest, Stops, and Use of Force data sets. They will also ensure that processes and controls for entry and new data collection efforts are in place. SFPD anticipates that some of these personnel will be in place by the end of 2025.</p>
<p>2. Establish a mechanism, such as automated notifications, to ensure timely report completion.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>After the completion of DPA's fieldwork, automated notifications to SFPD members reminding them to complete unfinished stops entries started in October 2024.</p>

<p>3. Formally reassess the feasibility of supervisor reviews to help verify the integrity of stop data. This assessment could explore:</p> <ul style="list-style-type: none"> a. Automating the supervisor review process within the Benchmark Stop Data System. b. Integrating stop data reviews into other, already existing supervisor review workflows. c. The potential for department dashboards to alert supervisors of data integrity issues like unreported stops. d. Lessons learned from other law enforcement agencies that require supervisory reviews. e. The potential for a pilot program to gather data on the feasibility of supervisor reviews and their impact on data integrity. 	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>Concur, however, the conduct and timing of a formal reassessment is dependent on department internal capacity. SFPD has confidence that with the proper data entry restrictions and logic checks built into the Benchmark stops data collection system, data integrity issues will be nearly nonexistent. Upon reassessing the feasibility of supervisory review of stop entries, should the Department determine the administrative burden makes it infeasible, the systems controls and aforementioned Data Governance and Integrity Unit will provide the verification of data integrity.</p>
<p>4. Regularly test stop data to identify and resolve potential data reliability issues. If this is not possible due to department capacity constraints, consider partnering with external organizations to perform data reliability testing.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>Concur. Development of automated testing of the data is ongoing with the recent hire of additional analytical and programming capacity.</p>

<p>5. Link stop data to other department records to facilitate checks on stop data completeness and accuracy. Consider automating the linkage to minimize the data entry burden on officers.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>Partial data linkage between CAD and BSDS is complete, with the addition of the CAD number for collection to the BSDS form as of 6/18/24. In past systems integrations, SFPD has found that automated linkages to CAD is unreliable and often requires officers to enter the CAD information anyway. However, the Department of Emergency Management is replacing their CAD system which may change the ability of this information to port over.</p>
<p>6. Update the training video to connect RIPA's requirements to departmental goals and demonstrate how stop data helps improve public safety. If updating the video is not feasible, SFPD should develop alternative methods to communicate the value and relevance of data collection in achieving the department's mission.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>The SFPD concurs that data collection in general is important for transparency and use in crime fighting and measurement of various interventions. When a training update regarding RIPA or stops data collection is next necessary, the Department will determine if the context of the training lends itself to adding these bigger-picture aspects to the video.</p>
<p>7. Implement a mechanism to verify that officers view mandatory stop data training videos.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>Future training videos will be loaded to the PowerDMS system, which has a by person tracking capability our previously used video hosting service did not.</p>
<p>8. Consider integrating the California Department of Justice's guidance on perception within its policies.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The RIPA/Stop DN will quote CalDOJ Guidance released in Dec 2018 upon next revision.</p>

<p>9. Assign responsibility for analyzing RIPA quiz results and use the analysis to address common knowledge gaps among officers.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>When SFPD promulgates a quiz, analysis of the results will be the responsibility of the proponent office or member.</p>
<p>10. Include scenario-based questions addressing identity perception in future RIPA quizzes. If SFPD does not intend to develop future RIPA quizzes, it should consider alternative ways to reinforce officers' understanding of RIPA requirements.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The department will integrate language into revised department notices, quizzes or other communications upon next issuance/revision.</p>
<p>11. Implement controls within the Benchmark Stop Data System to prevent invalid data combinations and ensure complete stop data.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The SFPD continues to work with its contractor to remedy failures in data collection system design and implementation.</p>
<p>12. To help ensure the early detection and correction of errors, adjust its data submission schedule to align with the California Department of Justice's recommendation for more frequent reporting.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The SFPD is developing internal processes to ensure a higher frequency of reporting to the CalDOJ, with a quarterly cadence intended.</p>
<p>13. Develop a structured testing protocol for all future system updates. The protocol should outline test execution activities, utilize scenarios that reflect real-world use cases, and define the roles and responsibilities all individuals involved in testing.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The Department agrees. A project management approach, including structured testing, to major system changes is a necessity. SFPD is unlikely to embark ever again on the breadth and depth of systems' implementations, improvements, and upgrades, as it has in the last two years and into the next five. When another systems launch is impending, a testing phase will be included.</p>

<p>14. Use Benchmark Stop Data System's capability to track the start and submission times of reports to establish baselines for report completion and use the analysis to identify trends and opportunities for process improvement.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The capture of start and end time, and analysis to determine data entry duration, is useful to evaluate system efficiency, user experience, and support SB 80 claims for reimbursement to the State. The department will pull this data into future reporting for analysis.</p>
<p>15. In conjunction with the implementation of the new dispatch and records management systems, formally plan and assess the feasibility of integrating them with the Benchmark Stop Data System. Planning should focus on opportunities to improve reporting efficiency while ensuring data accuracy.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>SFPD is committed to reducing the administrative burden of officers. Further, Prop E mandates it. As such, as has been the case during the last few years of effort in planning these systems replacements, efficiency gains, systems performance, user-centered design, and lack of multi-point entries of the same information have been key themes in systems' selection and implementation.</p>