

Report to the City of Santa Maria
SANTA MARIA POLICE DEPARTMENT
USE OF FORCE, INVESTIGATIONS, and
INTERNAL REVIEW SYSTEMS

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Table of Contents

Introduction	1
SECTION ONE Use of Force Review Systems	4
Officer-Involved Shootings & Critical Incident Review	5
Other Uses of Force	12
SECTION TWO Addressing Misconduct Allegations	18
Administrative Investigations	19
Public Complaints	20
SECTION THREE Other Operational Issues	23
Operational Initiatives	23
Hiring & Promotional Issues	24
Evaluations	25
Transparency	26
Community Engagement	28
Conclusion	29
Recommendations	31

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Introduction

Today's Santa Maria Police Department (SMPD) is vastly different from the Department OIR Group¹ first encountered when we began our initial review in 2012². The agency endured a tragic shooting incident that year and – through leadership changes, diligence, openness to outside ideas, and a commitment to reform – has transformed itself into a department that in some ways serves as a model of the type of progressive policing we frequently advocate. In part as a response to our 2014 report and 2015 follow-up, and well before the larger national conversation around policing erupted into protests and demands for reform following the murder of George Floyd in Minneapolis in May of this year, the SMPD was promoting transparency and efforts to assess and improve policies and practices to align agency culture with the expectations of the City's various communities.

Nonetheless, law enforcement's role in Mr. Floyd's death, along with the response to subsequent protest activity in cities around the country, brought increased scrutiny of police operations and accountability measures, and has prompted challenges as to whether the work that police traditionally have been asked to do should be reimagined. The SMPD met that challenge with an acknowledgement that there is always room for improvement, and it is in that atmosphere that the current Chief requested OIR Group to return to Santa Maria and give the police department an external "score card" of sorts, to mark the progress made since the time of our initial reports and to identify areas of potential for further development.

¹ OIR Group is a team that specializes in police practices and the civilian oversight of law enforcement. Its work with police agencies, throughout California and in several other states, has ranged from investigation to monitoring to systems evaluation. OIR Group began working with Santa Maria in 2012.

² This report can be found on our website – OIRGroup.com – https://a45ae0bd-a86b-4264-bab6-651d19eb0842.filesusr.com/ugd/d85a96_68d5ba8904e940818bce4a116cc33220.pdf

In our first report reviewing the SMPD, we commented on an agency going through a series of leadership changes in the wake of a tragic officer-involved shooting. Major reforms were underway as we conducted our audit and prepared our final report, published in 2014, which made 57 recommendations. We revisited those recommendations and made several additional suggestions in a shorter 2015 report³ designed to address the degree to which the Department had incorporated our recommendations into policy and culture. The 2015 report noted that, on the whole, SMPD was a healthy organization on the path to continued progress.

In the five years that followed our last report, leadership has worked to cement the agency's progress, and is understandably proud of the work that has been done. Moreover, to its credit, SMPD has continued to use our reports as primers for newly promoted executives regarding the issues that had been historically identified as in need of reform.

For this report, we reviewed use of force incidents (including one officer-involved shooting that resulted in a fatality), assessments of vehicle pursuits, internal administrative investigations, the Department's responses to public complaints, and materials related to hiring and personnel evaluations, training, and community outreach efforts. With the sole exception of the Department's efforts to review the relatively infrequent deadly force incidents – which we found could and should be more broad and holistic – we were largely impressed by SMPD systems and operations. In particular with respect to so-called “lower level” force incidents, we found the Department to be out in front of an increasing demand for law enforcement to view every incident as an opportunity for learning and growth. We also were impressed with the City's support of public safety over the past five years; perhaps best evidenced by the new police station that replaced the cramped facility we first visited in 2012.

The Department's receptivity to independent audits – beginning with our 2014 review and continuing through this latest engagement – differentiates it from the large majority of police agencies in the state. It is a mentality that will serve the Department well as it adapts to today's realities and expectations for collaboration and constructive problem-solving. We saw a good example of this in the development of the Department's recent partnership with Behavioral Wellness to develop a co-response team to find ways to better address mental health concerns in the Santa Maria community. This proactive,

³ https://a45ae0bd-a86b-4264-bab6-651d19eb0842.filesusr.com/ugd/d85a96_a1f0e5169c1c4e95927947337752ab6a.pdf

collaborative approach is consistent with the mindset we saw in other areas of our review.

The fact that our engagement for this review was initiated by the Chief is noteworthy in itself, and indicative of the level of cooperation and support we received. In addition to providing assistance as we gathered all relevant documents and other materials, Department representatives have been uniformly generous with their time, candid and helpful in answering our questions and responding to our concerns, particularly during our day long site visit where we met with Department executives. We were also impressed with both of SMPD's police associations⁴ willingness to meet with us and share their perspectives – views that are not antagonistic toward constructive reform. That degree of receptivity to our work is not universal among the agencies with whom we have worked, and we thank SMPD and its personnel for its commitment to engage.

We hope this report will serve as a reinforcement for the positive steps the Department has taken over the past five years, and that the recommendations we make throughout will be received with the same level of openness and consideration that has met our entire course of engagement with SMPD.

⁴ We met with representatives of both the Police Officers' Association and the Santa Maria Police Association of Middle Management (representing sergeants and lieutenants).

SECTION ONE: Use of Force Review Systems

How officers exercise their authority to use force in the course of their duties – for reasons that have become all the more obvious in the wake of recent tragedies and ensuing protests across the nation – is among the most important functions that agencies must carefully monitor. There is a need, of course, to eliminate incidents of excessive and unjustified force. But the legal responsibility to use force only when reasonably necessary should be buttressed by a broader imperative to diminish those instances in which officers might have been authorized or legally justified in using force, but in which the force was not strictly necessary to accomplish their objectives. To reach the goal of eliminating force that may be legally defensible but avoidable requires a law enforcement agency to closely review its officers' uses of force and to evaluate whether those incidents involved interactions prior to the force that could and should have been handled differently by the officers.

Consistent with this viewpoint, we reviewed one SMPD officer-involved shooting and 15 use of non-lethal force incidents to assess the way in which the Department investigates and evaluates these incidents and offer suggestions for improving those review processes. With respect to most force incidents, we found the Department to be better than most other similarly-sized agencies with which we have worked in the way it reviews and analyzes all the surrounding circumstances. For deadly force incidents, however, we found room for improvement in the Department's administrative response.

Officer-Involved Shootings & Critical Incident Review

When an SMPD officer shoots at and wounds or kills a subject, the first level of review is a criminal investigation conducted by the Santa Barbara County Sheriff's Office. The results of that investigation are submitted to the District Attorney's office, which scrutinizes the actions of each shooting officer and makes a determination of whether there is any basis for criminal prosecution. This process is typical of officer-involved shooting investigations throughout California and the rest of the nation, though the entity conducting the investigation differs from jurisdiction to jurisdiction (and many larger agencies handle the criminal investigations internally).

The assessment of criminal liability is of course an important element of accountability, and the one that tends to draw the most public attention. But for a variety of reasons, including high standards for establishing illegality, the prosecution of officers for their use of deadly force is extremely rare, and often unsuccessful even when cases do go to trial. As a result, a police agency's internal evaluations are generally more influential in terms of accountability, learning opportunities and impacts on future operations. They are also within the agency's span of control, not dependent on the judgment of the District Attorney.

Accordingly, when we evaluated the officer-involved shooting file we received as part of our review, we focused on the administrative processes set in motion by such a critical incident. These should include assessments of issues far beyond whether officer performance was legally justified, but also whether it complied with policy and training, and whether it raised or highlighted other issues, such as tactics, equipment, supervision, communication, and elements of post-incident response including medical aid and community outreach. We found areas for improvement in the SMPD process, beginning with its complete reliance on the criminal investigation for its fact-gathering related to these broader issues.

The criminal investigation conducted by Sheriff's detectives is intended to collect sufficient facts for the District Attorney to only determine whether the use of deadly force constituted a crime. As a result, the investigation is narrow and focuses on the officer's decision to use deadly force. Criminal detectives generally do not interview people or gather evidence with an eye toward determining whether the performance of any officer violated policy, assessing pre-event tactical decision making, reviewing the decisions of supervisors, or considering post-incident conduct such as the timely provision of medical care.

One very positive feature of the investigative process in Santa Maria is the timing of officers' interviews. Following the officer-involved shooting we reviewed, all involved officers provided voluntary interviews to Santa Barbara County Sheriff's investigators within hours of the incident and prior to involved personnel going "off shift." This is consistent with best investigative practice in terms of promoting the purest recollection of events – and minimizing the chances of interference (inadvertent or otherwise) with the purity of that statement. And it is not something that occurs in every agency. Instead, we know of many departments where the officers don't provide an initial statement for days after being involved in a shooting, an approach that creates obvious problems with the public's perception and leads to relevant questions about the integrity of officer-involved shootings investigations.

As we discuss more fully below, we urge the Department to also regularly conduct administrative interviews to address issues that may not have been part of the criminal investigation. We also encourage the Department to ensure that current practice of getting statements from involved officers prior to the end of their shifts is a standard that SMPD adheres to, even if it means compelling an administrative interview in the event an officer declines to provide a voluntary statement.⁵

SMPD's process for considering policy and other issues apart from the question of criminal liability is the Deadly Force Review Board, made up of a Commander, Lieutenant, and the Training Sergeant. Per policy, the Board is to evaluate the incident and make recommendations to the Chief "from the perspectives of tactics, training, policy, and equipment."⁶ This list is missing a couple of important aspects in our view, including the role and performance of supervisors and officers' conduct immediately after the shooting, particularly related to the provision of medical care. More importantly, the Board's ability to fully consider all of the issues surrounding a shooting incident is severely limited by the Department's complete reliance on the Santa Barbara County Sheriff's investigation.

Current SMPD policy allows the Deadly Force Review Board to initiate an administrative investigation when its review of an incident finds "significant violations

⁵ The voluntary statement to criminal investigators is just that – voluntary. Like anyone else, officers have a constitutional right not to make statements when they are the focus of a potential criminal case. If or when an officer declines to participate in an interview with criminal investigators, an agency can compel an officer to submit to an administrative as a condition of employment, though that statement would be excluded as evidence in any potential criminal case.

⁶ SMPD Policy Manual, 301.3.2.

of policy.”⁷ We believe an administrative investigation should be conducted following every officer-involved shooting, as well as other critical incidents, such as the death of an individual in custody. Making a follow up investigation an automatic feature of the Department’s review process would ensure that issues important to SMPD are thoroughly examined and would enable the Department to initiate a more robust executive-level review of these critical incidents.

More specifically, the Department should initiate an administrative investigation or review of the incident at the very outset. Many police agencies routinely assign internal affairs personnel to spearhead this effort as soon as they receive notice of the shooting. Those investigators respond to the scene and immediately begin coordinating with the criminal investigators to learn as much as they can about the incident as early as possible. They get a walk-through of the scene and generally observe interviews of witness and involved officers. This early access to information about the incident gives the agency the ability to immediately address concerns about policy, tactics, supervision, or community response that need not wait until the conclusion of the investigation.

Even with this early observation, because the interviews of involved officers conducted by criminal investigators are narrow and focus on the question of criminal liability, many agencies routinely conduct follow up interviews of involved and witness officers and supervisors as part of a broader administrative investigation. These interviews examine questions regarding planning, tactical decision making, supervisory decisions, communication, equipment, and post-shooting conduct so that the agency has an in-depth and complete fact set upon which to evaluate officer performance and identify other issues relating to the use of deadly force.

The evidence gap between what is obtained during narrow criminal and more broadly scoped administrative investigations extends beyond interviews of Department personnel. For example, in order to assess whether medical care was provided in a timely way after the use of deadly force, investigators often need to interview emergency medical providers and obtain related records, tasks not typically completed by criminal investigators.

⁷ SMPD Policy Manual, 301.3.2.

The one officer-involved shooting we reviewed⁸ provides some useful examples of our concerns about SMPD's current process:

In January 2018, officers responded to a 911 call from a residence in which a man was threatening family members with knives. In the protracted call, the man took the phone and made several comments to the dispatcher about his desire to die as well as statements about the police coming to kill him. During a second, concurrent 911 call from the apartment, the man's brother relayed that he and other family members were being held hostage and were not able to leave.

While the 911 calls were ongoing, numerous SMPD officers and a sergeant converged on the apartment building. They established a perimeter around the complex, assigned officers to various lethal and less-lethal weapons, and began to discuss how best to secure the safety of the apartment's residents, including whether to make entry or to request that the subject come out. Officers could hear the man inside the apartment, talking about being ready to die and how he would run at officers if they challenged him.

The subject eventually exited the apartment on his own, armed with two large kitchen knives. Officers at the front of the building ordered him to drop the knives, but he turned and walked toward the back of the building (still holding the knives), where he confronted additional officers. He walked toward a group of six officers, with a knife in each of his now-raised hands. One officer fired a single less-lethal munition round and struck the subject, who did not react or change course. The other officers fired a total of 21 rounds⁹ at the subject, striking him multiple times and killing him.

The District Attorney concluded this shooting was legally justified, and the Department likewise concluded the officers' actions complied with SMPD policy. The Deadly Force Review Board produced a short memo that concluded the tactics employed were

⁸ We are aware of another, more recent officer-involved shooting that was not part of our review because the investigation had not yet been fully completed. And it should be noted that it was controversial use of deadly force that instigated our first review of SMPD.

⁹ One officer attempted to fire his rifle, but perhaps due to weapon malfunction, no bullet was fired.

consistent with SMPD training and expectations but identified training and equipment issues related to the one officer's difficulty in firing his patrol rifle.¹⁰

The Santa Barbara County Sheriff's Office investigation was thoroughly and professionally done, but was narrowly focused on the question of the shooting officers' criminal liability. There were other issues that a thorough administrative review would have addressed. For example:

- In his interview with detectives, one officer referenced what has come to be known as the "21-foot rule."¹¹ This disregarded tactical principle still lingers as a sort of lore among officers, and there is concern that officers may see it as a legal justification to shoot a person with a knife who is less than 21 feet away, or to justify the use of deadly force in incidents when other tactics might have allowed a different resolution. A holistic review of a shooting should recognize this type of reference as a training opportunity, and to disabuse them of any belief about the scientific validity of the 21-foot mythology or inevitable outcome the rule suggests.
- This situation raised questions about what, if any, efforts were made to get a crisis negotiation team working to address the subject. Given the subject's apparent willingness to engage with the dispatcher on the phone for an extended time, continuing that conversation in coordination with on-scene officers was an option worthy of further discussion in the post-incident analysis. In their interviews, officers discussed some deliberations about whether an attempt to

¹⁰ We are personally familiar with the current Chief's long and heralded experience in quarterbacking tactical incidents as they are emerging as well as conducting robust and critical after action analyses of significant events. We expect that SMPD has benefitted from that experience and perspective in its review of deadly force incidents. Moreover, the Deadly Force Review Board may have reached its conclusions following a comprehensive discussion of other relevant concerns. Our point here, however, is that the Department could benefit from a more formal process to ensure a broader identification of issues worth addressing and more comprehensive documentation of any work and analysis that has been done.

¹¹ This so-called "rule" is based on one trainer's unscientific "experiments" in the 1980's that concluded an armed attacker could clear 21 feet in the time it took most officers to draw, aim, and fire their weapon and came to be seen by officers as legal justification for shooting a person with a knife that is less than 21 feet away. In 2015, the Police Executive Research Forum (PERF) concluded that the 21-foot rule should never be seen as a green light to use deadly force or as creating a "kill zone." Instead, PERF recommended that officers be given broader training in sound decision making, de-escalation strategies, and tactics for creating time and distance so they can better manage the incident without needing to resort to deadly force.

contact the subject might escalate the situation, or whether they should consider entering the apartment to confront him. While this was resolved when the subject decided to come out on his own, and events unfolded quickly after that, the incident warranted further discussion about these tactical decisions. Even in a case such as this one (or perhaps especially so), where a subject seems intent on provoking officers into shooting, the Department has an obligation to pursue all possible alternatives to avoid that outcome.

Our version of an ideal process for holistically considering the implications of a critical incident involves a phased response. Administrative personnel would put together an initial presentation for executives within a week or two of the incident. The goal at this stage would be to focus less on individual accountability (unless the incident quickly exposed clear issues about officer actions as a matter of law, policy, or fitness for duty) than on identification of potential issues in policy, training, supervision, tactics, or community response that are time sensitive and/or broadly relevant to agency operations. These are matters that could and should be addressed quickly – even during the pendency of the criminal review. This meeting likely would generate individual “action items” that are assigned to specific people for completion.

A second phase of more comprehensive administrative investigation could then address individual accountability or shed light on systemic issues not identified in the initial review. Performance issues that implicate policy – even if separate from the legitimacy or justification of the force itself – should be addressed through the discipline process or other tools available to correct individual behavior such as training, debriefing, or counseling. And administrative interviews of involved personnel should be utilized as a supplement to the criminal investigation and to provide a fuller picture of tactics, decision-making, supervision, and other relevant aspects of the case.

The final phase – a Deadly Force Review Board meeting at the completion of the administrative investigation – would be an opportunity to assess the full incident and to craft the different aspects of the Department’s response. Including the additional areas of consideration discussed above (supervision, medical care, and planning, for example) would preserve the flexibility needed to address each incident’s particulars in appropriately tailored ways.

With respect to concerns about officer sensitivity and deleterious “second-guessing,” we believe critical incidents such as shootings are intrinsically worthy of the highest levels of attention from law enforcement – as much for the sake of future operations as past accountability. And we believe that the process can be undertaken in a way that removes stigma and promotes constructive reinforcement and remediation.

The significance of these events – both to the Department and to the public – also warrants additional consideration of the impact on the community and how to best address it. In some jurisdictions, the Chief meets with community members in the days immediately after the shooting, with the clear purpose of listening to their concerns and explaining the investigative process (but not necessarily providing answers about the details of the incident in any significant way). The later release of video and other investigative details could be accompanied by a second meeting with the community to share these details in person. The Department should also consider when and how to meet with family members of a deceased subject. In our view, the Chief should always reach out to family members shortly after an officer-involved shooting with an extension of condolences and an offer to meet and discuss their concerns, with the understanding that some may not be immediately amenable to such a discussion.¹² This proactive approach to transparency and release of information and “open door” policy to family members and the broader community is in the best tradition of progressive policing, and should be a routine practice following an officer-involved shooting or other critical incident.

In sum, we make the following recommendations regarding the SMPD’s response to officer-involved shootings and other critical incidents:

RECOMMENDATION 1: The Department should develop protocols for the administrative investigation of officer-involved shootings and other critical incidents, including assigning personnel to closely monitor the criminal investigation and separate administrative interviews of involved personnel, to help the Department identify and resolve issues related not only to the use of force but also collateral matters that merit formal attention.

RECOMMENDATION 2: When an officer-involved shooting reveals statements by officers referencing a disregarded tactical principle such as the 21-foot rule, the Department should conduct a debriefing, training or bulletin to ensure officers understand the Department’s preferred tactical philosophies and recognize the appropriate considerations in determining whether and when to use deadly force.

¹² We are aware that the Chief met with the mother of the deceased subject in the case we reviewed for this report, and generally makes that outreach effort following a fatal critical incident. That is a commendable practice, and one, as set out above, which should be formalized.

RECOMMENDATION 3: The Department should change its Deadly Force Review Board protocols to ensure a holistic review and evaluation of all critical incidents, including the death of an individual in custody, and not just uses of deadly force.

RECOMMENDATION 4: The Department should change its Deadly Force Review Board protocols to ensure that its review and evaluation of all critical incidents encompasses all relevant issues, including the performance of all involved personnel (including supervisors and other non-force users) as well as issues of policy, training, tactics, supervision, equipment, and/or post-shooting conduct and performance.

RECOMMENDATION 5: The Department should consider ways to conduct its critical incident review in time-appropriate phases, beginning with an early, initial debrief and issue-spotting and continuing to a more thorough examination of administrative issues including officer performance.

RECOMMENDATION 6: The Department should develop a standard practice of offering to meet with family members and convening a community meeting within days of an officer-involved shooting or other critical incident to listen to concerns and explain the investigative processes.

Other Uses of Force

For this report, we reviewed 15 use of non-lethal force incidents representing a range of types of force used – strikes and restraints, chemical agents, electronic control weapons, K9 deployments, and beanbag shotgun rounds. While these incidents have less significant consequences than the shooting we reviewed (a reality inherently recognized in our recommendations for an expanded review process for deadly force incidents), every use of physical force constitutes an exercise of police power that warrants attention and appropriate scrutiny. The way in which an agency handles these incidents communicates to officers and the public much about the agency’s values and priorities and is a key indicator of its expectations for performance and response. Any use of force – no matter how minor or warranted – is something that an officer is expected to report, document, and justify. And we expect any law enforcement agency to review

those incidents for basic notions of policy compliance and whether the force is consistent with agency expectations..

Beyond that basic expectation, though, we would add that all force incidents deserve a level of *holistic* scrutiny that goes beyond legality or technical compliance with policy. We have reviewed many hundreds of force incidents over the years. The overwhelming majority of them have been deemed by their agencies to be “in policy” – and we often have no issue with those findings. At the same time, though, a much larger percentage of those cases raise one or more issues that merit some sort of managerial feedback involving issues related to supervision, officer tactics, planning and coordination, choice of force option, evaluation of de-escalation efforts, when feasible or equipment.

This is the philosophy behind the 15 recommendations relating to improving the reporting and review mechanisms for force that we made in our 2014 report, and our review of SMPD force incidents suggests that these are notions that Department leadership understands and accepts to a degree we do not often see among agencies we review. The extent to which SMPD has embraced this philosophy is both gratifying and praise-worthy.

SMPD’s current process for documenting and reviewing force employs BlueTeam – a software system that is becoming increasingly widespread among law enforcement agencies across the country. The software platform allows supervisors to record and track force incidents, gather all relevant documents and information (video and Taser downloads, for example), and record supervisorial assessments up the chain of command. We have worked with a number of agencies that use BlueTeam, and frequently observe that a department’s management is not recognizing the full potential of that asset. That general assessment makes SMPD’s use of the platform to fully document its review process all the more notable.

The process begins when officers document their uses of force and the precipitating circumstances on a Case Report that also records the facts surrounding a subject’s arrest. These reports are reviewed and approved by the officer’s supervisor, who enters the force incident in BlueTeam, providing a detailed summary of the incident and documenting the reason for the use of force, types of force used, any injuries to subjects or officers, and the race or ethnicity of those involved. Any available video footage (from in-car cameras or surveillance systems, audio files, photographs of the scene and any injuries, Taser downloads, and other reports) are all linked into the platform. The sergeant makes a recommendation about whether the force was in policy, with any other recommended action, then routes the BlueTeam entry up the chain-of-command for

review, approval and any appropriate action. Each level of supervisory review is documented in the program, with notes from the lieutenant and commander.

The technology streamlines evidence-gathering and the possibility of multi-tiered review. Of course, any software platform is only as good as the information going into it – and the extent to which management is committed to assessing and acting upon the data coming out of it. Effective review depends upon a number of factors – the thoroughness and quality of the underlying investigative work, the scope and emphasis of the reviewer, and the care with which each piece of the investigation is examined and conclusions are documented.

Among the cases we reviewed, we found the documentation of the force by officers to be complete and thorough. The supervisors' summaries were detailed and documented their own investigative actions (including witness and subject interviews and review of video and other evidence), as well as their conclusions about the evidence (for example, whether officers' descriptions were consistent with the video evidence). We also are happy to report that supervisors appropriately recognized a number of tactical issues and, with only a couple of exceptions, fully documented the debriefing, counseling, or training that was intended to address those issues. In particular, we were impressed by the level of detail supervisors committed to providing within the BlueTeam framework. For example:

- In one relatively straightforward case in which an officer used pepper spray on a non-compliant subject, the supervisor (an officer serving as an acting sergeant) routed the case in BlueTeam to the lieutenant for his review. The lieutenant routed it back to the acting sergeant and requested a follow-up conversation. The next entry is a detailed report from the supervisor documenting his conversation with the involved officers about some of the tactical and officer safety issues presented by the situation.

What is notable to us about this case is the level of care and detail demonstrated by the lieutenant. The force used was in policy, and the harm to the subject was short-term and minimal, yet the lieutenant recognized that some aspects of the event might have been handled differently. He devoted significant time to this case, and demanded that the supervisor do the same. The recognition that even relatively less significant uses of force are worth this level of scrutiny because of the learning opportunities they provide is commendable.

- In another case, again involving minimal force, a lieutenant concluded the force was in policy. The reviewing commander did not disagree, but noted an officer

safety issue that he questioned the lieutenant about, and the lieutenant then circled back to the reviewing sergeant with instructions to counsel the involved officer. The commander's attention to detail here sets a tone for the lieutenant and sergeant, and sends a message about the Department's expectations for thorough, holistic review.

- In other cases, we found sergeants and acting sergeants to have preemptively identified tactical concerns, signifying to us that Department leadership is effectively conveying to its first-level supervisors the importance of using these events as tools for learning and growth.
- In one case, the reviewing sergeant wrote a commendation for involved officers for exercising restraint in dealing with an agitated subject who was spitting at officers, kicking at the inside of a patrol vehicle, and generally being uncooperative and violent. Officers restrained him without injury, and the sergeant commended their successful de-escalation through planning and calm implementation.

In our view, commendations are a valuable tool for reinforcing an agency's principles and priorities. Acknowledging effective performance, – particularly for things like de-escalating and avoiding the use of physical force – sends a message that can be just as impactful (and perhaps more so) than disciplining or otherwise holding officers accountable for not meeting Department expectations.

The SMPD also effectively uses BlueTeam to evaluate and track vehicle pursuits, with a similar focus on thorough documentation and identification of issues for counseling and remediation.

On notable exception to the Department's otherwise thorough review process is an apparent lack of sufficient attention to concerns surrounding foot pursuits. In apparent recognition of the fact that the dynamic of most foot pursuits is inherently unsafe for the officer, SMPD has adopted a comprehensive foot pursuit policy that sets out responsibilities for officers and supervisors, and generally discourages the most unsafe tactics associated with these pursuits in an attempt to balance officer safety considerations with the goal of apprehending suspects.

We reviewed one use of force incident in which the force was preceded by a foot chase of the subject. The circumstances suggest (though the facts are not entirely clear from the documentation we reviewed) that two officers split up during the pursuit, with one

officer remaining in the patrol car while the other pursued on foot. This should have raised some concerns about officer safety issues to be addressed as part of a holistic review of the force incident. There may be reasons why the pursuit was not more thoroughly discussed and evaluated in this individual case (particularly given what we saw throughout an otherwise detailed review process), but the absence of a specific assessment of the foot pursuit tactics and compliance with policy suggests a gap in what we saw as an otherwise comprehensive force review process.

We commend SMPD for its willingness to push past the simple dichotomy of “in policy or not” when it comes to evaluation of use of force incidents and subsequent managerial intervention. Its commitment to a meaningful force review mechanism signals an intent to learn from these incidents with the goal of providing officers with training, strategies, and tactics to address challenges in the field with minimal use of force. Our recommendations, then, are intended to reinforce and build upon current practice.

RECOMMENDATION 7: The Department should continue to holistically review and evaluate each use of reportable force to address concerns of tactics, supervision, planning and coordination, choice of force option, or equipment. Specifically, we encourage SMPD to continually reinforce with sergeants and supervisors up the chain of command the importance of systematically asking probing questions as they review each force incident, including those most relevant to whether officers did all they could to de-escalate situations and reduce the likelihood of force.

RECOMMENDATION 8: The Department should create formal mechanisms or expectations for reviewing circumstances surrounding foot pursuits for compliance with the Department’s foot pursuit policy as well as sound tactical and officer safety principles.

A final consideration regarding how a department evaluates use of force is the extent to which it uses data to look beyond individual incidents to larger trends. When supervisors enter incidents into the BlueTeam platform, they enter a great deal of specific information, including location, time of day, types of force used, effectiveness of particular techniques, and demographic details about the subject and involved officers. All of that data can be pulled into useful reports that give department managers an overall picture of the use of force within their agencies, to identify potential problem areas and strategize about further force prevention measures. It also

provides the opportunity to routinely publish reports about use of force in the interest of greater transparency and increased organizational accountability (as we discuss more fully below). Performing this sort of trend analysis is a natural next step for SMPD's force review process.

RECOMMENDATION 9: The Department should explore ways to use the data available in its BlueTeam platform to analyze trends with the goal identifying potential problems and developing strategies to address them.

SECTION TWO: Addressing Misconduct Allegations

SMPD learns of allegations of misconduct either through internal means – when a supervisor suspects an officer of wrongdoing, for example – or by means of a complaint made by a member of the public.¹³ The latter do not always or necessarily become formal “Administrative Investigations,” depending on the results of some initial inquiry and attempts at resolution. Regardless of origin, all are investigated internally, by SMPD lieutenants. Critics have questioned law enforcement’s ability to objectively address misconduct within its own ranks for decades, but events of this year have amplified the calls for transparency and accountability in ways that bring these questions into sharper focus. The traditional law enforcement “Internal Affairs” model bumps up against arguments in favor of subjecting police conduct issues to greater public scrutiny (or, in some places, outright control).

We do not get the sense that the Santa Maria public is clamoring for “community control” of the police, but SMPD should nonetheless heed the national narrative as a reminder of the importance of protecting the integrity of its internal investigative and disciplinary systems. To judge the effectiveness of an agency’s processes for handling allegations of officer misconduct, we look to several relevant questions:

- Does the agency facilitate the acceptance of complaints from the public through clear communication and an inclusive intake system?
- Does the agency investigate allegations of misconduct in thorough, fair, and appropriate ways?

¹³ SMPD terminology refers to these as “citizen complaints,” language we suggest changing to reflect the reality that not all members of the public necessarily have status as citizens, but deserve to have their complaints received and handled with equal care and diligence.

- Does the agency uphold its own standards apart from external prompting or allegations?
- Does the agency view its discipline process as a source of potentially useful feedback that extends beyond individual accountability determinations?
- Does the agency promote trust through transparency and notification regarding its processes and the outcome of complaints?

For this report, we reviewed five Administrative Investigations and 15 public complaint responses, all from 2019. While we found some room for improvement among the individual examples we surveyed, our overall assessment of SMPD's internal systems is positive.

Administrative Investigations

Of the five Administrative Investigations we reviewed, four were internally-generated (including two use of force incidents for which the Department decided to open formal investigations), and one originated as a public complaint. In our 2014 report, we made eight recommendations for improving practices around internal affairs investigations. While our sample size here was too small to completely assess whether each of these recommendations has been fully implemented, our view of the entire process (which in 2014 left a favorable impression) demonstrates an embrace of the principles we espoused in our prior report. On the whole, the investigations we reviewed for this report were completed in a thorough, professional way.

There were a couple of cases with questions we would have liked to have seen answers to that went unasked. In one case in particular, we believed the investigator should have asked some follow-up questions to more fully explore the subject's mindset. But these critiques are nibbling around the edges at what were otherwise objectively and competently-handled investigations.

One case presented a supervisory issue that was not fully explored in the documentation we reviewed. This was in contrast to what we otherwise saw as a positive aspect of the Department's review of these administrative investigations – its holistic approach to identifying and addressing concerns.

For example, in one of the use of force cases, the Chief identified a broader systemic concern with how officers were making arrests pursuant to California Penal Code

section 148 (resisting or obstructing a peace officer). The issue was not central to the allegations in the administrative investigation, but how officers choose to pursue these charges following force incidents is central to an agency's mission to fairly and justly enforce laws. The Chief's identification of this issue, and direction to his staff to develop some new approaches, is an excellent example of "thinking outside the box" and viewing every incident as an opportunity to learn and positively impact future operations. While no follow-up was documented in the investigative file, Department leaders acknowledged the need to find new approaches to 148 arrests and are working with lieutenants to develop new review protocols to address the issue.

One aspect of the Department's review and resolution of these cases that gave us some pause was the nature of the consequence imposed in response to misconduct findings. In our conversations with Department leaders, we sometimes questioned whether discipline in a particular case was significant enough to address the underlying misconduct. The responses we got revealed more nuance than could have been conveyed in the investigative packets we read, including an understanding of the life circumstances a subject may have been dealing with at the time. We can appreciate this sensitivity and while we caution against the sort of individual considerations that can devolve into what looks like favoritism, we note that the Department did not allow these factors to *excuse* conduct, but only to mitigate the severity of discipline.

Public Complaints

One of the hallmarks of a police agency's effectiveness and community standing is its responsiveness to allegations of officer misconduct made by members of the public. In our view, this is another strong point for SMPD.

Complainants can register their concerns in different ways and are not obligated to use the standard form, though the public complaint form is clear, concise, and easily accessible in both English and Spanish on the Department's website. Importantly, the form contains thoughtful and respectful assurances about the Department's investigative practices and possible outcomes, as well as this language:

The Santa Maria Police Department takes seriously all complaints regarding the conduct of its members or the service provided by the Department. We will accept and address all complaints of misconduct. It is our policy to ensure that reports of misconduct can be made without concern for reprisal or retaliation.

This stands in contrast to the language we still see on many agency’s complaint forms, warning complainants about the potential liability for making a false complaint against an officer. This has an obvious chilling effect on even the most legitimate complainants, and we have frequently recommended its removal from public complaint forms (including in our 2014 report to Santa Maria).

For this report, we reviewed 10 public complaints from 2019 containing a range of allegations: rudeness or unprofessionalism, improper or unwarranted ticketing, poor driving, failure to properly investigate or handle a call for service. Each was investigated and reviewed with the appropriate amount of detail, and with just one exception,¹⁴ we had no quarrels with the final disposition of each complaint.

There were two complaints involving issues at or around local schools – one a traffic issue during the morning drop-off time and the other a concern about the involvement of a School Resource Officer in a student disciplinary matter. Both were handled properly, but both also raised broader operational concerns apart from the allegations against individual officers. In each case, those broader concerns warranted conversations with school officials – about how best to manage traffic safety at the beginning and end of the school day, and under what circumstances school personnel should be summoning an SRO to address disciplinary matters. To our knowledge, those conversations did not occur, and the Department missed an opportunity to prevent future similar complaints from arising. Just as the Department looks at force incidents as opportunities for internal learning and growth, it should view allegations brought to it by outside individuals or entities as opportunities for collaboration and systemic improvement.

One area in which the Department excels is the quality of the notification letters the Chief sends to complainants at the end of the review process. Too often, agencies default to standard, boilerplate language that provides a minimal amount of information and does little to assure complainants that their concerns were taken seriously. These letters may technically comply with the agency’s legal notification requirements but do not promote trust or confidence in the validity of outcomes.

SMPD is not among those “boilerplate” agencies. The letters to complainants authored by the Chief are personalized and provide specific information about the investigative process as well as a detailed explanation of the basis for the Department’s decision.

¹⁴ We questioned the level of discipline in one case where the complaint was found to be sustained. Following our discussion with the responsible commander, however, we understood the reasoning behind the Department’s disciplinary decision and do not find it to be unprincipled.

Remarkably and refreshingly (because it diverges from the too frequent stance of law enforcement agencies), the resolution letters even offer apologies in appropriate ways. We encourage the Department to maintain this strong record of sincerity and transparency in its notification letters to complainants.

RECOMMENDATION 10: Beyond resolving public complaints and other allegations of misconduct, the Department should look at underlying issues of concern and, where possible, develop broader ways to address those problems through collaboration with outside entities.

PART THREE: Other Operational Issues

Operational Initiatives

In our meetings with Department personnel, we heard about a number of positive initiatives and some concerns about matters that could be handled more effectively. One of these has to do with the way in which the Investigations Bureau is staffed, and how the 14 detectives within that Bureau manage their cases. The Commander whose responsibilities include overseeing detectives reported his frustration with the fact that detectives rarely have time to investigate property crimes, instead mainly leaving those to patrol officers to handle. Often when we hear an agency's leaders talk about things they *can't* do, it is a lead-in to an argument in favor of hiring more personnel. So it was refreshing to hear in Santa Maria that frustration over staffing had led to an examination of the Bureau's efficiency and discussion about different ways to manage the caseload. The outcome of that conversation is a new case management review system, with appropriate database support, and the assignment of a civilian employee to the Investigations Bureau to work property crimes.

A related issue is the Department's new data infrastructure systems – Record Information Management System (RIMS) and Computer Aided Dispatch (CAD). It was reported that these systems had been seriously outdated, and the upgrade was a welcome improvement. Integrated records management and dispatch systems is an integral part of modern police functionality. At the same time, Department leaders feel that the systems have potential that thus far has been untapped. In order to take full advantage of these resources, Department leaders advocate for the addition of a crime or data analyst who can mine the new infrastructure for information that will allow the Department to more effectively address the community's concerns. This would be a beneficial staffing move for the Department, and we believe the City should consider

this request, of course taking into consideration the strain the coronavirus pandemic has put on municipal budgets.

Another positive development, in our view, is the Department's recently-created partnership with the City's Behavioral Wellness program. SMPD will designate a Crisis Intervention/Co-Response Officer who, together with an assigned mobile crisis worker from Behavioral Wellness, will respond to calls for service involving a mental health crisis. The co-response team will also conduct proactive contacts with individuals with mental health issues, relieve patrol officers from routine mental health calls, act as a liaison between the Department and mental health service providers, and consult with officers who are dealing with individuals in crisis. The hope is that the program will divert those with mental health issues away from the criminal justice system when appropriate and instead connect those individuals with needed services.

Similar types of co-response programs have existed in some larger cities for years, and have been largely successful when properly resourced. Many more cities throughout the state and in other parts of the country are modeling plans after these larger programs, in part as a response to the recent push for cities to re-think the way they allocate law enforcement resources and "re-imagine" the way police respond to various calls. We applaud SMPD's initiative in starting this program. We urge the Department to carefully study its initial results and make adjustments as needed as it discovers the best ways to address the mental health concerns of those in the Santa Maria community.

Hiring & Promotional Issues

Any discussion about staffing or promotional issues at SMPD should start with an acknowledgement of the very healthy relationship between management and both the officers' and mid-level managers' associations. Their frequent and open communication increases the likelihood that they can address issues and concerns with some shared goals.

With respect to the Department's hiring initiatives, one notable concern is the relatively small number of female officers. We discussed this issue with Department leadership, who are all mindful of the issue – and have been making concerted efforts to address it. The challenge of achieving greater gender balance in law enforcement is far from unique to Santa Maria, and the Department acknowledges that it would like to do better. Importantly, we do not doubt that Department leaders understand the distinctive contributions female officers might bring, or have any reason to believe that women are not welcome or supported in the SMPD environment. Nonetheless, we took note that

all three of the sample background investigations we requested – for recent applicants who were ultimately hired – were for male applicants.

Moreover, SMPD currently has no female officers of rank – no sergeants, lieutenants, or commanders. This reality is troublesome, both on its own and for its implications as a barrier to the aspirations of younger female officers or potential applicants. Again, the Department acknowledges this is an issue and we understand it is doing all that it can to address it. These efforts have been challenged by the relatively short tenure of most of the women that are currently on staff, making most of them not yet eligible to promote. And we note that the women who are currently with the Department fill special collateral assignments in a much greater proportion than their male counterparts; convincing evidence of leadership’s support of female advancement within the organization. Accordingly, we simply encourage the agency to maintain its concerted efforts to identify and develop qualified female personnel.

We emphasize that this is not an issue of superficial quota fulfillment. Indeed, hiring or promoting an unprepared or ill-suited woman can backfire in ways that are detrimental to future female promotions or hires. Instead, it is a way of recognizing that individuals from different backgrounds bring different sets of skills that can enhance a police agency’s ability to connect with the various groups with a community. It is a means of gaining credibility and trust among people who have lacked representation in law enforcement. And it promotes awareness and insight *within* the ranks in ways that strengthen responsiveness and effectiveness.

RECOMMENDATION 11: The Department should commit to strengthening the range and responsiveness of its workforce by continuing to focus on gender equity in its recruiting efforts.

RECOMMENDATION 12: The Department should continue its efforts to provide promotional opportunities and mentoring for female officers.

Evaluations

One measure of effective management relates to the formal evaluation of employees in an agency. We are accustomed to seeing halfhearted efforts even among agencies that claim this as a priority. The reasons are plain, and even understandable – the process of writing evaluations is labor-intensive when done well, and the constant flow of other

work in conjunction with the various incentives to avoid conflict often result in perfunctory end products that have little real value. But the consequences can be significant – creating a record that glosses over actual performance issues can make it harder for the agency to take disciplinary or other responsive action if and when it needs to in the future.

The sampling of performance evaluations we requested and received from SMPD stood out from efforts we see from other agencies in noteworthy ways. First, the evaluations appear to be completed in a timely way. And the completed forms generally avoided the type of “grade inflation” we commonly observe, where every officer is deemed exceptional. The SMPD uses a rating scale of “Superior – Acceptable Plus – Acceptable – Acceptable Minus – Unacceptable” across several categories of evaluation. Only one evaluation we reviewed was “Superior” across the board, but most importantly, the assessment is not just a simple series of checked boxes, but each category is supported by detailed comments explaining the reason for the particular mark. The comments highlight individual strengths as well as potential areas for improvement. We also were encouraged by the inclusion of “Community Oriented Policing Activities” as a critical area of review. Using the ability to resolve issues through a community lens as a metric during the evaluation process highlights the agency’s priorities and encourages officers to focus on these skills as they go about their daily responsibilities. We urge the Department to maintain its high standards in this important area of personnel management.

Transparency

For several years, law enforcement agencies around the country have faced new levels of scrutiny and public expectation. In California, the push for greater transparency and accountability spurred recent state legislation that directly relates to the public’s access to police records and other information that was previously confidential.

Two relevant laws took effect in 2019 and one in 2020: one relating to the release of investigation files relating to significant force events (such as officer-involved shootings) and certain kinds of serious officer misconduct, one that created a default deadline of 45 days for the release of recorded evidence (such as body-worn camera videos) for specific categories of critical incident, and a third requiring the on-line posting of police policies and training materials. These constitute important changes in the public’s ability to understand and evaluate law enforcement’s substantive

performance – and the willingness of individual agencies to address that performance through its internal review processes.

SMPD has adapted its protocols to these new requirements. Following an officer-involved shooting in June of this year, the Department released a community briefing via video, delivered by the Chief and a sergeant involved in the investigation, that included video from the officer's in-car camera and shared details about the Department's review process.

Beyond that legally required disclosure, however, we were impressed by other efforts to embrace transparency. Days before that June shooting, the Chief released a Bulletin directed to community members in which he discussed SMPD demographics, use of force data, and policy initiatives aligned with the "8CantWait" campaign that took hold over the summer. The bulletin was certainly (and understandably) "pro-police" in its orientation, but respectful of community concerns and closed with the Chief's philosophy that "we derive our authority from the very people we serve, and that part of our core responsibility is the preservation of their rights."

The Department should build on this initiative toward transparency and develop additional ways to share information with the public. For example, in addition to tracking individual use of force incidents, the BlueTeam platform has great potential for providing data on the overall use of force broken down by types of force used, locations, dates and times, and the demographics of both officers and subjects. We discussed above how the Department should use this information to identify trends and potential systemic issues for its own internal purposes. But it also could be used to further promote a culture of transparency. Regularly publishing data on law enforcement activities – not just use of force, but also stops, summonses, arrests, and reported crime – would provide the public a window into Department functions and help to build public trust for the agency. Information about complaints and other misconduct investigations is another opportunity to enhance public understanding about processes that have long been shrouded in secrecy. There are various ways that insight into these accountability systems can be shared without violating privacy rights; we hope the Department – and its partners in the City, who ultimately have control over website content – will consider utilizing them.

RECOMMENDATION 13: The City, with SMPD’s assistance, should regularly publish on its website use of force data, broken down by types of force used, and demographics, and should include data on the extent to which alcohol, drugs, or the subject’s mental health status played a role in the incident.

RECOMMENDATION 14: The Department should consider other types of information it can share more freely with the public to increase both transparency and accountability, including periodic updates about the number, type, and resolution of various complaint and misconduct investigations.

Community Engagement

The growing movement toward sharing more information with the public is important for increasing the community’s understanding of law enforcement operations, but equally important is the Department’s willingness to *engage* with the public it serves. “Community engagement” can take many forms. Some are aimed at educating the public about law enforcement practices and developing positive relationships and impressions of officers in the community. For example, SMPD runs a “Community Academy” that it bills as a way to promote understanding of SMPD culture. Things like the Department’s (pre-pandemic) “trunk-or-treat” Halloween events and participation in “Cop on a Rooftop” fundraisers are also examples of this type of outreach and are important ways to build civic goodwill.

In our view, true “engagement” goes beyond sharing information, or “outreach,” to being willing to truly *listen* and *take in* information from the community. One form of this type of engagement is the Chief’s Advisory Council, a diverse group of community members who meet regularly with the Chief to provide their input on various aspects of Department operations.

There are ways the Department could expand on its engagement efforts. For example, the community could be invited to engage in hiring and promotional decisions at all ranks. Community members outside the SMPD culture could provide insight and a fresh perspective on candidates that the Department already knows. Moreover, during the interviews, community representatives will likely focus on issues such as the candidate’s ability to productively engage with the public and have potentially different perspectives on the traits they would most value in an officer or supervisor.

RECOMMENDATION 15: The Department should engage community members at the interview stage of its hiring and promotional process.

SMPD also should continually look to expand its outreach efforts beyond Department-initiated events to participation in those planned and organized by the community. Such efforts may be limited by COVID-related public health guidelines at the moment, but when we all get back to meeting in person in public spaces, the Department should make efforts to identify ways to connect with members of the public it serves at times and in places not selected by police.

RECOMMENDATION 16: SMPD should continue to constructively engage with its community by increasing its emphasis on participating in community-initiated events.

Conclusion

SMPD is understandably proud of the progress it has made since the first OIR Group report in 2014. Then, the agency had gone through significant turmoil following an officer-involved shooting that ended in the death of one of its members and a subsequent change in leadership. The Department met that moment with transparency and openness, and the difference between our initial assessment of SMPD over five years ago and our current review is commendable.

Now, we are experiencing an intense moment of scrutiny for police agencies around the country following high-profile incidents involving the abuse of police authority, accompanied by an increased demand for greater accountability. And we are in the midst of a pandemic that has taken lives, created significant economic hardship, and upended everyday norms. Through that, SMPD is again going to go through another change in leadership, with Chief Hansen's recent announcement of his upcoming retirement.

It is more important than ever that the police listen, engage, and coordinate with other stakeholders in the community. Following our visit to Santa Maria over the summer, we feel confident that SMPD is prepared for the coming change. We have met many Chiefs over decades of work in this field, a good number of whom approach their jobs as if they are the only one capable of doing it. While it seems apparent that Chief Hansen is indeed quite good at his job, one indication of a true leader is a willingness to

put the agency first and develop the next generation of leaders so that the agency can continue to move forward in his absence. The current Chief has thoughtfully approached the inevitability of his retirement by empowering his subordinates and exposing them to all aspects of the Department while getting them to understand and adopt the reforms of the past five years. As a result, we have confidence those reforms will outlast the Chief, and the SMPD is well-positioned to address the challenges of the current changing landscape.

Despite our many positive observations about the Department, we also found opportunities for change that we hope SMPD will consider and implement in the spirit of making continuous efforts at improvement. We were gratified by the assessment that our past reports had contributed to SMPD's progress over the years, and again extend thanks for the full cooperation we have received. We look forward to watching SMPD's next period of change and growth.

Recommendations

- 1 The Department should develop protocols for the administrative investigation of officer-involved shootings and other critical incidents, including assigning personnel to closely monitor the criminal investigation and separate administrative interviews of involved personnel, to help the Department identify and resolve issues related not only to the use of force but also collateral matters that merit formal attention.
- 2 When an officer-involved shooting reveals statements by officers referencing a disregarded tactical principle such as the 21-foot rule, the Department should conduct a debriefing, training or bulletin to ensure officers understand the Department's preferred tactical philosophies and recognize the appropriate considerations in determining whether and when to use deadly force.
- 3 The Department should change its Deadly Force Review Board protocols to ensure a holistic review and evaluation of all critical incidents, including the death of an individual in custody, and not just uses of deadly force.
- 4 The Department should change its Deadly Force Review Board protocols to ensure that its review and evaluation of all critical incidents encompasses all relevant issues, including the performance of all involved personnel (including supervisors and other non-force users) as well as issues of policy, training, tactics, supervision, equipment, and/or post-shooting conduct and performance.
- 5 The Department should consider ways to conduct its critical incident review in time-appropriate phases, beginning with an early, initial debrief and issue-spotting and continuing to a more thorough examination of administrative issues including officer performance.

- 6 The Department should develop a standard practice of offering to meet with family members and convening a community meeting within days of an officer-involved shooting or other critical incident to listen to concerns and explain the investigative processes.
- 7 The Department should continue to holistically review and evaluate each use of reportable force to address concerns of tactics, supervision, planning and coordination, choice of force option, or equipment. Specifically, we encourage SMPD to continually reinforce with sergeants and supervisors up the chain of command the importance of systematically asking probing questions as they review each force incident, including those most relevant to whether officers did all they could to de-escalate situations and reduce the likelihood of force.
- 8 The Department should create formal mechanisms or expectations for reviewing circumstances surrounding foot pursuits for compliance with the Department's foot pursuit policy as well as sound tactical and officer safety principles.
- 9 The Department should explore ways to use the data available in its BlueTeam platform to analyze trends with the goal identifying potential problems and developing strategies to address them.
- 10 Beyond resolving public complaints and other allegations of misconduct, the Department should look at underlying issues of concern and, where possible, develop broader ways to address those problems through collaboration with outside entities.
- 11 The Department should commit to strengthening the range and responsiveness of its workforce by continuing to focus on gender equity in its recruiting efforts.
- 12 The Department should continue its efforts to provide promotional opportunities and mentoring for female officers.
- 13 The City, with SMPD's assistance, should regularly publish on its website use of force data, broken down by types of force used, and demographics, and should include data on the extent to which alcohol, drugs, or the subject's mental health status played a role in the incident.

- 14 The Department should consider other types of information it can share more freely with the public to increase both transparency and accountability, including periodic updates about the number, type, and resolution of various complaint and misconduct investigations.
- 15 The Department should engage community members at the interview stage of its hiring and promotional process.
- 16 SMPD should continue to constructively engage with its community by increasing its emphasis on participating in community-initiated events.