

**Performance Audit of the
San Francisco Police Department**

Prepared for the

**Board of Supervisors
of the City and County of San Francisco**

by the

San Francisco Budget and Legislative Analyst

June 12, 2018

BOARD OF SUPERVISORS

BUDGET AND LEGISLATIVE ANALYST

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June 12, 2018

Supervisor Norman Yee and Members of the San Francisco Board of Supervisors
Room 244, City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

Dear Supervisor Yee and Members of the Board of Supervisors:

The Budget and Legislative Analyst is pleased to submit this *Performance Audit of the San Francisco Police Department*. In response to a motion adopted by the Board of Supervisors on March 14, 2017 (Motion 17-037), the Budget and Legislative Analyst conducted this performance audit, pursuant to the Board of Supervisors powers of inquiry as defined in Charter Section 16.114 and in accordance with U.S. Government Accountability Office (GAO) standards, as detailed in the Introduction to the report.

The performance audit contains five findings and nine recommendations, of which eight are directed to the Chief of Police. The Executive Summary, which follows this transmittal letter, summarizes the Budget and Legislative Analyst's findings and recommendations. Our recommendations are intended to improve the effectiveness of the allocation and deployment of police officers and to enhance overtime controls to prevent unnecessary overtime.

The Chief of Police has provided a written response to our performance audit, which is attached to this report on page 79. The Department agrees or partially agrees with six of our recommendations and disagrees with two of our recommendations.

- The Police Chief disagrees with Recommendation 2.2, which recommends that the Department adopt an 8 hour or 10 hour patrol shift with a weekly rotation, rather than the current 10 hour shift with a 49 day rotation. According to the Police Chief's written response, "SFPD cannot accomplish this recommendation in the immediate term due to collective bargaining rights afforded to employees."

Although it would likely require a meet and confer process with the Police Officers Association, we continue to recommend that the Department modify its patrol shift and rotation schedule in order to reduce the variation in officer availability within a given shift. As noted on page 30 of our report, the Department successfully modified its shift schedule for certain sworn staff in 2012, moving 503 sworn staff from a ten hour shift to an eight or nine hour shift, resulting in 16,000 additional officer days each year. The Department calculated that the effect of the transition away from a ten hour shift was the equivalent of hiring 66 full time equivalent (FTE) positions at no additional cost.

- The Police Chief also disagrees with Recommendation 3.1, which recommends a modified supervision schedule for sergeants in order to normalize the Department's span of control within its patrol operation. According to the Police Chief's written response, "Realigning the span of control by placing supervisors on a staggered fourteen day schedule would not provide adequate supervision for officers. The Department

believes it to be necessary to have supervisors interacting with the same officers on a regular basis, providing consistency in performance evaluation.”

However, as noted on page 31 of our report, there is a significant variance in the span of control (number of sergeants supervising patrol officers) across districts. We continue to propose the modified supervision schedule that would reduce the variance across districts and shifts in the patrol span of control, and realize greater efficiencies in the allocation of the working hours of sergeants.

We would like to thank the Chief of Police, the Chief Financial Officer, and Police Department staff for the assistance they provided during the audit.

Respectfully submitted,



Severin Campbell, Director
Budget and Legislative Analyst's Office

cc: President Breed
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Executive Summary

The Board of Supervisors directed the Budget and Legislative Analyst's Office to conduct a performance audit of the San Francisco Police Department through a motion (M17-037) passed on March 14, 2017.

The scope of this performance audit includes: (1) an assessment of the Police Department's deployment of Police staff funded by the General Fund, (2) an assessment of the allocation of uniform staff to administrative and patrol duties, and (3) an assessment of the uniform staff overtime.

Patrol Staffing Allocations to Police Districts

The San Francisco Police Department's (SFPD) current practice to allocate Police officers to the City's ten Police districts does not fully reflect actual district workload. Districts show wide disparities in the number of officers assigned relative to the core indicator of demand for Police services – calls for service. Call for service time – the time a Police unit is engaged in responding to a call for service, and hence is unavailable to respond a different call or engage in self-initiated activities – varied in 2017 from an average of 30 percent or more for the Central, Mission, and North districts, to an average of 17 percent for the Park District.

As the number of full-duty officers has increased, the Department's total time spent responding to calls for service has declined. The Department's average citywide time spent responding to calls for service fell from 35.7 percent to 27.5 percent between September 2016 - March 2017 and September 2017 - March 2018. For car sector patrol only, the average time spent responding to calls for service fell from 37.4 percent in September 2016-March 2017 to 29.8 percent in September 2017-March 2018, below the recommended range of 30 percent to 50 percent in the 2008 Police Executive Research Forum assessment of the Department. Although the Department reviews the level of calls for service for each Police district when making staffing allocations, calls involve different amounts of time to resolve. Simply tracking call volumes, without any analysis of the time spent by units in responding to these calls, does not provide a comprehensive picture of each district's workload.

The Police Department does not have a performance target for the percentage of time that patrol officers in each district spend responding to calls for service. As a result, the Department has no basis for evaluating whether additional staff is necessary to meet performance targets or whether the correct numbers of staff are allocated to the ten Police districts.

Recommendation 1.1: The Chief of Police should establish a call for service time target as the Department's baseline performance objective, and allocate patrol officers to the ten districts based on this call for service time performance objective.

Patrol Staffing Schedules

The Police Department uses a 10 hour shift and a 49 day rotation schedule for patrol officers assigned to the Police districts. This shift schedule results in wide discrepancies in the number of officers that are actually available for a shift on any given day within a Police district. This is particularly true for the car sectors, which handle the majority of service calls. Within each district, the daily car patrols are understaffed or overstaffed based on the point of time in the 49 day rotation cycle. The Department could achieve more efficient staffing allocations at the Police districts by adopting either an 8 hour, 5 day on 2 day off or a 10 hour, 4 day on, 3 day off work schedule.

Recommendation 2.1: The Chief of Police should evaluate existing watch off group and shift assignments by Police district and develop protocols for the Police district captains to more efficiently assign patrol staff to W/O groups and shifts.

Recommendation 2.2: The Chief of Police should adopt either an 8 hour, 5/2 or a 10 hour, 4/3 weekly work schedule to improve the consistency of daily staffing in the Police Districts.

Span of Control

The span of control between sergeants and patrol officers is highly variable across the Police districts. The spans of control are typically below the 8:1 threshold level recommended by the Commission for Accreditation of Law Enforcement for most districts. These disparities indicate inconsistent and less than optimal use of staff time devoted to supervision of patrol personnel. The Department could improve the span of control ratios in its patrol operation by modifying its deployment schedule.

Recommendation 3.1: Subsequent to elimination of the 49 day rotation period, The Chief of Police should re-align the span of control by placing supervisors on a staggered fourteen day schedule.

Overtime Controls

The Police Department does not sufficiently control the use of overtime, especially overtime for arrests and investigations that extend shift hours. Total overtime hours increased by 57 percent between FY 2010-11 and FY 2016-17. General Fund overtime expenditures increased from \$14.2 million in FY 2014-15 to \$20.6 million in FY 2016-17. The increase in overtime hours for arrests and investigations has not coincided with an increase in the number of arrests. Overtime hours for arrest and investigation nearly tripled between 2010 and 2016 even though the arrests for violence offenses decreased by 14 percent and arrests for property crimes decreased by 31 percent over the same period. Overall, the number of arrests the Department made for felony offenses in 2016 was 30 percent lower than in 2010.

Both the Department and the City have policies to limit individual overtime use. The Department requires pre-approval to work overtime hours and signed

approval of the overtime timecard before payment is processed. However, these policies are not consistently enforced. Other policies limiting the number of hours an individual can work are also not consistently enforced; for example, the number of occurrences of sworn staff working more than 14 hours in a day increased from approximately 3,700 in FY 2010-11 to more than 9,800 in FY 2016-17.

The Police Department needs to improve its oversight and management of overtime through setting formal expectations for supervisors approving overtime; monitoring the use of overtime by Police district and type, responding to high overtime use; and better incorporating overtime controls into Police district and budget performance.

Recommendation 4.1: The Chief of Police should develop and implement overtime policies, including (1) written guidelines for Police district captains, lieutenants, and sergeants on approving shift extension overtime, including specific criteria for when approval of shift extension overtime is appropriate; (2) incorporation of compliance with overtime approval guidelines (including enforcement of existing policies on pre-approval and sign-off of overtime on timecards) into captain, lieutenant, and sergeant annual performance evaluations; and (3) required training for captains, lieutenants, and sergeants on implementation of overtime policies and procedures.

Recommendation 4.2: The Chief of Police should increase oversight of overtime Department-wide and by Police district and revise biweekly reporting requirements to better identify and correct unusual, unexplained, or disproportionate use of overtime (including high users); and identify and reduce occurrences of overtime that exceed Department and City overtime limits.

Recommendation 4.3: The Chief of Police should incorporate analysis of cost-effectiveness of overtime and alternatives to overtime use to accomplish tasks or program objectives into the annual budget.

Civilianization

As the rate of property crime in the City increases and the public demands the presence of more Police officers on the street, the San Francisco Police Department must maximize the use of sworn employees in providing critical public safety services. Since at least 1998, audits and studies of SFPD staffing have resulted in recommendations to civilianize administrative positions currently filled by sworn staff—a best practice recognized by major law enforcement associations, including the International Association of Chiefs of Police, and adopted by most major law enforcement departments in the country. Yet, San Francisco's ratio of sworn to civilian staff remains higher than both its peers and the national average. Because the City makes a significant investment in training Police officers with skills to keep the public safe, assigning those highly trained (and highly compensated) officers to administrative functions is an inefficient use of resources. Police officers are among the highest paid employees in the City. Using civilian employees rather than sworn officers to staff administrative

positions within the Department would cost less per position. While there is a need for sworn officers in certain administrative and non-patrol positions, particularly in supervisory roles, there are opportunities to civilianize many positions, which would produce cost and operational efficiencies for the Department. As it seeks to increase the number of Police officers serving the City, the Department should adopt a civilianization plan as a key component of that effort to maximize the number of full-duty officers providing direct public safety services.

Recommendation 5.1: The Board of Supervisors should request the Controller to conduct civilianization reviews, in conjunction with the Police Chief, the Department of Human Resources and our office, as required by the City Charter.

Recommendation 5.2: The Police Chief should work with the Mayor's Office to expedite the immediate civilianization of at least 30 positions in the Administration Bureau currently filled by officers, in order to redeploy those officers in to the field.

Introduction

The Board of Supervisors directed the Budget and Legislative Analyst's Office to conduct a performance audit of the San Francisco Police Department through a motion (M17-037) passed on March 14, 2017.

Scope

The scope of this performance audit includes: (1) an assessment of the Police Department's deployment of Police staff funded by the General Fund, (2) an assessment of the allocation of sworn staff to administrative and patrol duties, and (3) an assessment of the sworn staff overtime.

Methodology

The performance audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS), 2011 Revision, issued by the Comptroller General of the United States, U.S. Government Accountability Office. In accordance with these requirements and standard performance audit practices, we performed the following performance audit procedures:

- Conducted interviews with Police Department command staff as well as civilian division managers and staff.
- Reviewed prior assessments of the Police Department, including the Police Executive Research Forum's 2008 Organizational Assessment of the Department and other reports prepared by our office and the Office of the Controller.
- Reviewed the Department's General Orders, policies, procedures, memoranda, and City policy governing staffing and overtime use.
- Reviewed and analyzed data on staffing and budget provided by the Police Department.
- Conducted an extensive literature review to identify best practices related to Police staffing and overtime controls.
- Conducted a benchmarking survey of staffing and overtime practices of other Police departments. The responding agencies were Philadelphia, Oakland, Denver, Portland, San Jose, Miami, San Diego, and Seattle. These cities were identified as peer Police departments in the Controller's 2015 Benchmarking report of Police Staffing.

- Submitted a draft report, with findings and recommendations, to the Police Department on May 16, 2018; and conducted an exit conference with the department on June 1, 2018.
- Submitted the final draft report, incorporating comments and information provided in the exit conference, to Police Department on June 5, 2018.

Acknowledgements

We would like to thank the Police Department and the Controller's Office for their assistance during this audit process.

Overview of the Police Department

The Police Department's budget is currently organized into five major program areas: (1) Airport,¹ (2) Investigations, (3) Operations and Administration, (4) Patrol, and (5) Services of provided to other City Departments.² The Office of Citizen Complaints was transferred out of the Department in FY 2017-18 when the Department of Police Accountability was created. Exhibit 1 below presents the department's total budget over the six past fiscal years.

Exhibit 1: Six Year Summary of the Police Department Budget (All Funds)

Program	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	% change
Airport Police	47,645,035	49,622,941	49,894,105	53,344,782	56,635,610	58,264,799	22.3%
Investigations	78,528,877	81,811,136	79,962,610	78,397,469	82,979,272	82,922,008	5.6%
Office of Citizen Complaints	4,610,850	4,829,125	5,135,411	5,570,081	6,870,659	0	-100.0%
Operations & Administration	69,261,206	89,793,489	81,755,904	86,201,113	93,544,703	102,467,415	47.9%
Patrol	275,603,051	290,243,911	304,986,576	316,406,873	332,824,586	339,246,196	23.1%
Services of Other City Dept.	14,297,189	10,636,265	7,108,567	4,801,231	4,890,673	4,846,066	-66.1%
Total	489,946,208	526,936,867	528,843,173	544,721,549	577,745,503	587,746,484	20.0%

Source: San Francisco Police Department and Annual Appropriation Ordinance FYs 2017-18 & 2018-19

As shown above in Exhibit 1, the Police Department's total budget has increased by 20.0 percent between FY 2012-13 and FY 2017-18. Of the five program areas, Operations and Administration experienced the largest increase over this time—from \$69.2 million in FY 2012-13 to \$102.5 million in FY 2017-18, or by 47.9 percent.

With the exception of the Airport Bureau, the Police Department is largely funded by the General Fund. Exhibit 2 below shows the Police Department's General Fund budget and actual expenditures over the past five fiscal years.

Exhibit 2: Five Year Summary of the Police Department General Fund Budget and Actual Expenditures

	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	% Change
Budget	\$430,432,000	\$445,443,000	\$463,002,000	\$480,431,000	\$503,375,000	16.9%
Actual	\$430,426,000	\$445,443,000	\$455,758,000	\$479,929,000	\$501,540,000	16.5%
Surplus	\$6,000	0	\$7,244,000	\$502,000	\$1,835,000	

Source: San Francisco Police Department

¹ The San Francisco Police Department provides Police services to the Airport, which are funded in the Airport's budget. In addition to providing basic Police services to the Airport, the SFPD Airport Bureau enforces the Airport's Transportation Security Administration's security plan and supports individual security plans of the airlines.

² These services include monies provided by the Municipal Transportation Agency, the Port, and the Library to pay for Police services.

As shown above, from FY 2012-13 to FY 2016-17, the Police Department's General Fund budget increased from \$430,432,000 to \$503,375,000, or approximately 16.9 percent. In the past three fiscal years, the Police Department has spent less than its General Fund budget.

Overtime

As shown below in Exhibit 3, the Police Department's actual General Fund overtime expenditures for sworn staff have exceeded the Department's original budget allocation every year since FY 2012-13. The Department is projected to overspend its General Fund overtime budget for sworn staff again during the current fiscal year, FY 2017-18. The Department has typically paid for excessive overtime spending through supplemental appropriation of salary savings from vacant positions.

Exhibit 3: Six Year General Fund Overtime Budget and Actual Expenditures for Sworn Staff

	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18
Budget	12,397,883	12,638,891	12,638,891	13,638,891	14,638,217	18,027,240
Actual	14,028,678	13,335,647	14,174,399	19,504,900	20,644,548	19,204,008
Overspending	1,630,795	696,756	1,535,508	5,866,009	6,006,331	1,176,768
% Budget Increase		1.9%	31.1%	7.9%	7.3%	23.2%
% Overspent	13.2%	5.5%	12.1%	43.0%	41.0%	6.5%

Source: San Francisco Police Department

Notes: The overtime budgets for FY 2014-15 and FY 2015-16 include the original budgets for uniform overtime as well as the estimated budgets for court pay, estimated by the Department to be \$3.0 million annually. Court pay was budgeted and expensed as premium pay until April 2014, after which actual court pay expenditures were reflected in the overtime budget line. The Department's budget for overtime included court pay beginning in FY 2016-17.

Total actual overtime expenditures in FY 2017-18 are projections provided by the San Francisco Police Department as part of their March 8, 2018 request to the Board of Supervisors for supplemental appropriations.

Although the amount of overspending is projected to decrease from 13.2 percent in FY 2012-13 to 6.5 percent in FY 2017-18, the General Fund budget for the department's overtime has increased during the same period, from \$12.4 million in FY 2012-13 to \$18 million in FY 2017-18.

Exhibit 4 below summarizes the Police Department's overtime hours by category. The Department's General Fund overtime pays for three major categories of Police overtime: (1) court appearances that occur outside of an officer's regular shift, (2) arrests and investigations, (3) events (such as Gay Pride and Chinese New Year). Event overtime is also paid for by grants. Overtime for officer training of new recruits is typically reimbursed by state education funds. The largest overtime category, 10B, is reimbursed by non-City organizations requesting Police services.

Exhibit 4: Five Year Summary of Sworn Overtime Hours (All Funds)

	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	% Change
10B ^a	113,842	113,119	117,710	143,473	142,476	25.2%
Events ^b	103,505	101,507	136,027	189,564	154,192	49.0%
Arrest/ Investigation	64,279	74,973	75,755	91,795	113,223	76.1%
Court	45,614	38,019	39,433	40,623	41,510	-9.0%
Training	9,785	10,151	10,721	18,215	21,866	123.5%
Total Hours	337,025	337,769	379,646	483,670	473,267	40.4%

Source: San Francisco Police Department HRMS data

^a 10B overtime is defined in Administrative Code Section 10-B, and is paid by non-City organizations requesting Police services of the Department.

^b This scheduling category is used for parades, 1st Amendment Gatherings, Dignitary Visits, Critical Incidents, Mutual Aid, and other public events. The high amount of Special Event overtime in FY 2015-16 is due partly due Super Bowl 50 related public events. A portion of Special Event overtime is grant funded.

As shown above in Exhibit 4, overtime hours have increased by 40.4 percent between FY 2012-13 and FY 2016-17. With the exception of Court related overtime, overtime hours worked for 10B activities, arrests/investigations, events, and training have all increased since FY 2012-13. Overtime related to pursuing arrests and completing investigations increased by 76.1 percent between FYs 2012-13 and 2016-17 and Special Event overtime increased by 49 percent over the same period. Training related overtime increased by 123.5 percent between FY 2012-13 and FY 2016-17, which has corresponded to the increased number of Police Academies that have taken place during that time. 10B overtime increased by 25.2 percent between FY 2012-13 and FY 2016-17.

Staffing and Organizational Structure

The Police Department employs both sworn and civilian employees and is organized into five Bureaus, each overseen by a Deputy Chief: (1) Administration, (2) Professional Standards & Principal Policing, (3) Field Operations, (4) Special Operations, and (5) the Airport. In addition, the Department has Fiscal and Technology Divisions, overseen by civilian staff.

Since FY 2012-13, the number of budgeted sworn and civilian employees, excluding Airport employees, has increased by 11.7 percent—from 2,350 in FY 2012-13 to 2,626 in FY 2016-17. As shown in Exhibit 5 below, the number of budgeted sworn staff increased from 2,040 to 2,241 during that time, and the number of civilian employees increased from 310 to 385.

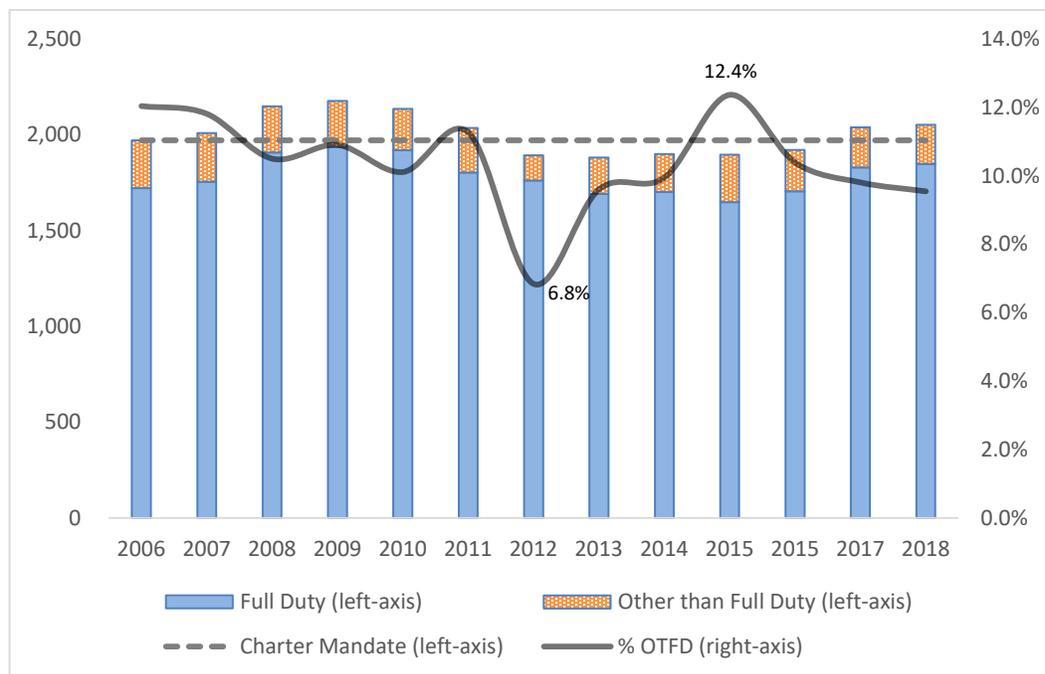
Exhibit 5: Total Budgeted Sworn and Civilian Full Time Employees, FY 2012-13 to FY 2016-17 (excluding Airport)

	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	% change
Sworn	2,040	2,023	2,083	2,138	2,241	9.9%
Civilian	310	357	355	362	385	24.2%
Total	2,350	2,380	2,438	2,500	2,626	11.7%

Source: SFPD Reports to the Budget & Finance Committee, 2013-2017.

Per Section 4.127 of the San Francisco Charter, the Police Department must maintain a minimum of 1,971 full duty sworn officers in the City. The Charter does not have requirements about whether those full duty officers are deployed to patrol, investigations, or administrative duties. Although the Department has increased the number of sworn positions in its budget, the number of officers available for full duty has not yet reached the 1,971 Charter mandate. Based on projections of hiring and separation trends, the Police Department expects to reach its Charter mandated staffing level of 1,971 full duty officers by December 2018. Exhibit 6 below shows the historical full duty trends for the Department’s General Fund sworn positions.

Exhibit 6: Full Duty and Other than Full Duty Officers, 2006 to present (excluding Airport)



Source: San Francisco Police Department

As shown in Exhibit 6 above, the percentage of sworn staff not on full duty has fluctuated between 6.8 percent and 12.4 percent of total sworn staff. Sworn staff not considered full-duty are those on military leave, disability, family leave, temporary modified duty, administrative leave, or disciplinary leave.

New hires and Retirements

The Department has had substantial turn over in its sworn staff between FY 2012-13 and FY 2016-17. As shown below in Exhibit 7, the department has hired 1,098 sworn officers by increasing the number of its annual academies between FY 2012-13 and FY 2016-17. Over the same period, the department had 511 retirements and 362 other separations (such as deaths and terminations) for a cumulative net increase of 175 sworn staff between FY 2012-13 and FY 2016-17.

Exhibit 7: Five Year Summary of Separations and Police Academy Hires

	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	Total
Academy Recruits	183	157	223	333	152	1,048
Retirements	(163)	(124)	(78)	(74)	(72)	(511)
Other Separations	(25)	(50)	(80)	(84)	(123)	(362)
Net change	(5)	(17)	65	175	(43)	175

Source: San Francisco Police Department

Note: As the Department has increased its City staffing with Police Academy graduates, it has re-assigned a portion of its sworn staff to the Airport Bureau to offset turnover there.

The larger amount of retirements in FY 2012-13 and FY 2013-14 relative to the succeeding fiscal years is likely due to the Deferred Retirement Option Program (DROP), approved by the Board of Supervisors on May 20, 2008. The DROP allowed certain pension-eligible full duty officers to continue to work while collecting their pension in order to avoid the cost and delays of hiring new Police officers. The program was in effect between FY 2007-08 and FY 2010-11, after which the Department experienced an increased amount of retirements relative to the period during which the program was in effect.

Recent Organizational Changes

During FY 2016-17, prior to receiving approval by the Board of Supervisors, the Police Department created five additional executive management positions, augmenting its command structure with three additional Commanders and two Assistant Chiefs of Police. The Board then approved the creation of these positions in the FY 2017-18 – FY 2018-19 annual appropriation and salary ordinances. The Department's General Fund command staffing is summarized below in Exhibit 8.

Exhibit 8: General Fund Command Staff

	2014-15	2015-16	2016-17	2017-18	Change FY 2016-17 to 2017-18
Captain	25	25	26	26	0
Commander	3	3	3	6	3
Deputy Chief	4	4	4	4	0
Assistant Chief	0	0	0	2	2
Chief	1	1	1	1	0
Total Command	33	33	34	39	5

Source: FAMIS budget data

The two new Assistant Chiefs of Police were created to provide an additional layer of oversight to the Department's five Bureaus: Administrative, Professional Standards, Field Operations, Special Operations, and the Airport. The three additional Commander positions were created to oversee three new Divisions: Administration (within the Administration Bureau), Chief of Staff, and Community Engagement.

Investigations and Foot Beats

In September 2017, the Department reorganized the Investigations Division. The Patrol Bureau Task Force, created in 2015 to investigate car breaks-ins, was disbanded and a smaller investigative unit dedicated to burglaries and auto break-ins was created. The rest of the officers in the Patrol Bureau Task Force as well as some in the Narcotics Unit (together totaling 29 officers) were reassigned to foot beats. The purpose of the reorganization was to increase the number of visible officers on the street across the ten Police districts. Exhibit 9 below shows the increase in the number of foot beats after the reorganization.

Exhibit 9: Number of Foot Beats, 2016 and 2017

	March 2016	September 2017
Bayview	9	6
Central	12	14
Ingleside	0	4
Mission	0	7
Northern	8	12
Park	10	16
Richmond	4	10
Southern	0	13
Taraval	2	5
Tenderloin	4	36
Total	49	123

Source: San Francisco Police Department staffing memoranda

As shown above, the number of foot beats more than doubled from 49 in March 2016 to 123 in September 2017.

Major sources of demand for Police services

During the audit, the Police Department provided information on calls for Police service and recent policy changes that impacted the Department's General Fund sworn workload. Exhibit 10 below summarizes the increase in calls for service by priority as well as officer-initiated Police activities.

Exhibit 10: Police Calls For Service and Self-Initiated Patrol Activity

	2012	2013	2014	2015	2016	% Change
Priority A	68,738	72,260	73,912	86,322	85,820	24.9%
Priority B	109,958	118,041	179,917	218,826	168,250	53.0%
Priority C	122,223	127,010	259,824	308,238	195,111	59.6%
Subtotal, Calls for service	300,919	317,311	513,653	613,386	449,181	49.3%
Information (“I”) calls	16,818	17,672	25,650	110,311	294,410	1,650.6%
Self-initiated calls	397,462	370,820	299,224	415,079	395,495	-0.5%

Source: San Francisco Police Department

Note: The Department of Emergency Management (DEM) manages the City’s 911 call center, which prioritizes incoming calls and dispatches Police patrol units to respond. Priority A calls are for crimes that are in progress. Priority B calls are for crimes that just occurred, calls that indicate the potential for physical harm or property damage, and calls that indicate the suspect is in the area. Priority C calls are for crimes that did not recently occur. 911 calls that are for information purposes only but not dispatched are coded as Priority “I.” In order to dispatch the closest available unit, officers on patrol inform DEM dispatchers when they self-initiate activities and are therefore unavailable to respond to a call for service, noted as “Self-initiated calls” in the table above.

As shown in Exhibit 10 above, the number of calls for service has increased by 49.3 percent between calendar years 2012 and 2016. Priority A calls (when a crime is actively taking place) increased by 24.9 percent in that time. Priority B calls (when a crime has recently occurred) increased by 53 percent. Our analysis of the dispatch data between March 2016 and March 2018 found that call duration did not materially change over that period. As a result, the increased number of calls for service between 2012 and 2016 reflects additional workload for the Department. However, as shown in Exhibit 10 above, the increase in the number of calls for service between 2012 and 2016 has corresponded to only a marginal decrease (0.5 percent) in the number of self-initiated patrol activities.

Recent Policy Changes

In addition to calls for service, the Police Department provided information on new mandated activities and training requirements that have contributed to the Department’s workload for sworn staff.

The U.S. Department of Justice Assessment

In April 2016, the City partnered with the Department of Justice’s Office of Community Oriented Policing to identify improvements in the Police Department’s policies and practices related to use of force, biased policing, and community policing. The final report, issued October 2016, contained 272 recommendations which the Department is in the process of implementing. According to an analysis by the Police Department, 149 of the 272 recommendations create additional work for existing sworn and civilian staff. In our review of the Police Department’s analysis of the report’s staffing impact, we identified 10 recommendations that will add to the Department’s training requirements for all sworn staff once fully implemented.

Body Worn Cameras

The Department has deployed 1,985 body cameras to all Lieutenants, Sergeants, and Officers. In June 2016, the Department issued General Order 10.11 requiring officers equipped with body worn cameras to activate them when performing the following activities:

1. Detentions and arrests
2. Consensual encounters where the member suspects that the citizen may have knowledge of criminal activity as a suspect, witness, or victim
3. 5150 evaluations [psychiatric-related arrests]
4. Traffic and pedestrian stops
5. Vehicle pursuits
6. Foot pursuits
7. Uses of force
8. When serving a search or arrest warrant
9. Conducting any of the following searches on one's person and/or property:
 - a. Incident to an arrest
 - b. Cursory
 - c. Probable cause
 - d. Probation/parole
 - e. Consent
 - f. Vehicles
10. Transportation of arrestees and detainees
11. During any citizen encounter that becomes hostile
12. In any situation when the recording would be valuable for evidentiary purposes
13. Only in situations that serve a law enforcement purpose

Officers must note in their reports when body worn cameras have been used and upload the footage to the cameras vendor's online database.

Homeless Related Calls for Service

According to Police Department data, the Department responded to 54,434 calls related to homeless individuals in the six month period between January 2017 and June 2017. The Department included calls for encampments, sitting/lying in public spaces, psychiatric holds (5150 requests), and aggressive panhandling in its six month analysis. The Department also reported that it believes the number of homelessness related calls for service has been increasing over the past several calendar years.

In our June 2016 report to the Board of Supervisors, "Homelessness and the Cost of Quality of Life Laws," we identified 60,491 homelessness related calls in the first nine months of calendar year 2015.³ Our report also found that the City spent \$20.6 million in calendar year 2015 for sanctioning homeless individuals for violating quality of life laws. The Police Department accounted for 90 percent (or \$18.5 million) of those enforcement costs but enforcement had no impact on the

³ Budget and Legislative Analyst, "Homeless and the Cost of Quality of Life Laws," June 2016 <https://bit.ly/2wClco7>

incidence of homelessness. Our report recommended the Board of Supervisors identify less expensive and more effective response strategies to homeless related calls for service besides dispatching Police officers.

Overview of San Francisco Crime Trends

Between 2012 and 2016, the number of reported violent and property crimes increased in San Francisco. Violent crimes include homicide, rape, robbery and aggravated assault as reported to the US Department of Justice. Property crimes include burglary, larceny and motor vehicle theft. Exhibit 11 below shows how reports of these types of crimes increased over the past five years for which data is available.

Exhibit 11: SF Property and Violent Crimes, Calendar Years 2012 to 2016

Type of Crime	2012	2013	2014	2015	2016	% Change
Property	38,898	48,324	45,093	53,019	47,402	21.9%
Violent	5,777	7,064	6,761	6,710	6,190	7.1%

Source: U.S. Department of Justice Uniform Crime Reporting data

Although violent crimes have increased, the major increase in crime has been property-related. However, as shown below in Exhibit 12, arrests and clearance rates for both violent and property crimes have both decreased over time.

Exhibit 12: Arrests and Clearance Rates

Calendar Year	2010	2011	2012	2013	2014	2015	2016	% Change
Felony Arrests	10,802	8,911	8,244	9,220	7,953	7,430	7,614	-30%
Violent Offenses	2,386	2,385	1,883	2,052	1,900	1,955	2,043	-14%
Property Offenses	1,636	1,425	1,320	1,574	1,270	1,119	1,132	-31%
Drug Offenses	2,936	1,756	1,461	1,398	1,114	858	860	-71%
Sex Offenses	65	83	60	61	69	55	53	-18%
Other Felony Offenses	3,779	3,262	3,520	4,135	3,600	3,443	3,526	-7%
Misdemeanor Arrests	11,305	13,917	12,144	11,786	10,352	12,484	9,943	-12%
Status Offenses	5	9	20	3	4	9	0	-100%
Violence Crimes Clearance Rates								
San Francisco	33.4	34.4	28.6	33.1	30.6	30.5	35.9	7%
National Average	47.2	47.7	46.8	48.1	47.4	46	45.6	-3%
Property Crime Clearance Rates								
San Francisco	9.9	9.4	7.2	7.8	9.6	6.7	7.0	-29%
National Average	18.3	18.6	19.0	19.7	20.2	19.4	18.3	0%

Source: California and U.S. Departments of Justice

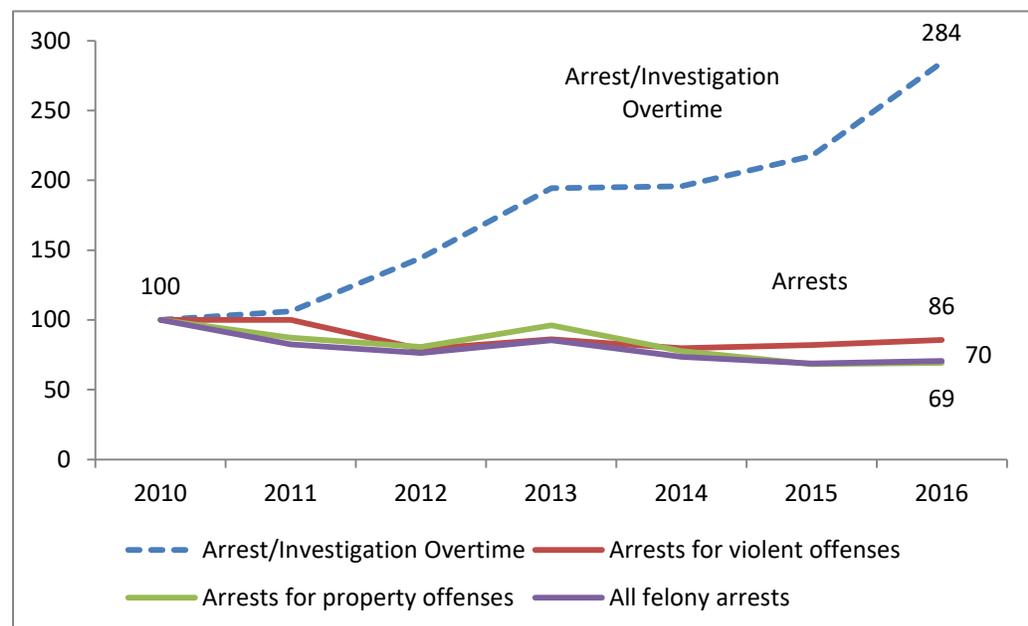
As shown above in Exhibit 12, arrests for all categories of crime have declined since calendar year 2010. The number of felony arrests has decreased by 30 percent and the number of misdemeanor arrests has declined by 12 percent.

In addition, as shown above in Exhibit 12, the San Francisco clearance rates for both violent crime and property crime are below the national average. Clearance rates generally refer to the rate at which a department makes an arrest for a reported crime.

Overtime, Arrests, and Clearance rates

The largest contributor of General Fund overtime is overtime related to arrests and investigations. Exhibit 13 below summarizes the change in arrest/investigation overtime hours against the change in the number of arrests that the Department reports to the California Department of Justice indexed to calendar year 2010.

Exhibit 13: Arrest/Investigation Overtime Compared to Felony Arrests (2010 = 100)



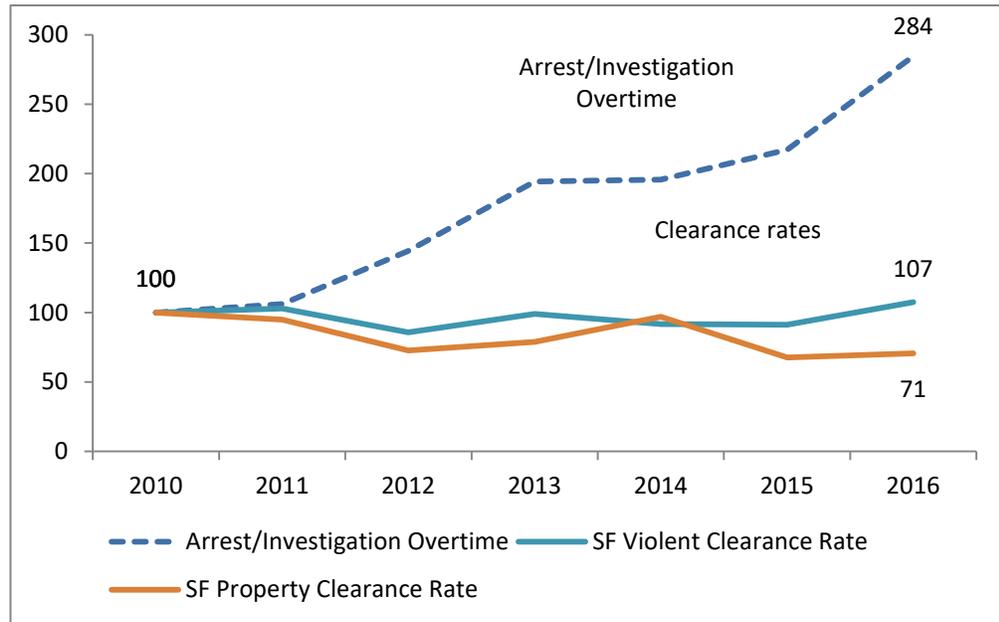
Source: San Francisco Police Department HRMS Data; California Department of Justice

Note: Values normalized to 2010.

As shown above in Exhibit 13, the increase in overtime hours for arrests and investigations has not coincided with an increase in the number of arrests. Overtime hours for arrest and investigation nearly tripled between 2010 and 2016 even though the arrests for violent offenses decreased by 14 percent and arrests for property crimes decreased by 31 percent over the same period. Overall, the number of arrests the Department made for felony offenses in 2016 was 30 percent lower than in 2010.

Arrest and investigation overtime similarly has a loose connection with clearance rates for property and violent crimes. As noted above, clearance rates generally refer to the rate at which a department makes an arrest for a reported crime. Exhibit 14 below shows the change in such overtime hours relative to the change in the clearance rates for each category of crime indexed to calendar year 2010.

Exhibit 14: Arrest/Investigation Overtime Compared to Clearance Rates (2010 = 100)



Source: San Francisco Police Department HRMS Data; California Department of Justice

As shown above in Exhibit 14 above, the nearly threefold increase in overtime has only corresponded to a 7 percent increase in the clearance rate for violent crimes. Over the same that arrest and investigation overtime was increasing, the clearance rate for property crimes, already below the national average, decreased by 29 percent.

1 Patrol Staffing Allocations to Police Districts

The San Francisco Police Department's (SFPD) current practice to allocate Police officers to the City's ten Police districts does not fully reflect actual district workload. Districts show wide disparities in the number of officers assigned relative to the core indicator of demand for Police services – calls for service. Call for service time – the time a Police unit is engaged in responding to a call for service, and hence is unavailable to respond a different call or engage in self-initiated activities – varied in 2017 from an average of 30 percent or more for the Central, Mission, and North districts, to an average of 17 percent for the Park District.

As the number of full-duty officers has increased, the Department's total time spent responding to calls for service has declined. The Department's average citywide time spent responding to calls for service fell from 35.7 percent to 27.5 percent between September 2016-March 2017 and September 2017-March 2018. For car sector patrol only, the average time spent responding to calls for service fell from 37.5 percent in September 2016 - March 2017 to 29.8 percent in September 2017 - March 2018, below the recommended range of 30 percent to 50 percent in the 2008 Police Executive Research Forum assessment of the Department. Although the Department reviews the level of calls for service for each Police district when making staffing allocations, calls involve different amounts of time to resolve. Simply tracking call volumes, without any analysis of the time spent by units in responding to these calls, does not provide a comprehensive picture of each district's workload.

The Police Department does not have a performance target for the percentage of time that patrol officers in each district spend responding to calls for service. As a result, the Department has no basis for evaluating whether additional staff is necessary to meet performance targets or whether the correct numbers of staff are allocated to the ten Police districts.

The Department's Current Staffing Practices

Our office conducted a variety of workload based staffing analyses to assess the following areas of concern:

- The degree to which SFPD staffing allocations *across* the ten Police districts are responsive to variances in the demands for Police services actually observed in the ten districts.
- Whether current shift schedules are achieving a cost-efficient distribution of available patrol staff *within* each of the ten districts over the course of the 24-hour daily working period.
- Whether the Field Operations Bureau adjusts district-level staffing assignments over each subsequent six-month staffing period to reflect shifting crime patterns and calls for service.

- Whether the Department has implemented any of the options presented in the 2008 Police Executive Research Forum (PERF) report pertaining to staffing practices and determination of performance objectives.

Field Operations Bureau Staffing Allocations

The Field Operations Bureau determines the allocation of Police officers to the ten Police Districts. Police officers are redistributed within the ten Police districts coinciding with the seniority sign-up six month period and finalized on the first day of the first pay period in the months of March and September. The Department considers the following information when evaluating six-month staff allocations:

- (a) changes in the total number of sworn patrol officers due to retirements, promotions and new hires;
- (b) overall crime trends, both city-wide and by Police districts;
- (c) number of total calls for service, both overall trends and broken out at the district level;
- (d) number and percentage of priority A level calls for service;
- (e) response time to priority A, B, and C level calls;
- (f) historical staffing levels; and (g) desired staffing levels by district Captains.

The Field Operations Bureau makes assignments based on these factors, adjusted for the number officers available for deployment in the current six-month staffing period. District captains are responsible for determining the actual staffing of the various shifts and patrol units within their district, using instructions and directives provided by the Field Operations Bureau. The relative allocations of officers between the shifts and various types of units – car patrol, foot beat, housing patrol, school resource officers, and homeless outreach - vary to reflect the specific public safety needs of the district.

Although the Department reviews the level of calls for service for each Police district when making staffing allocations, calls involve different amounts of time to resolve. Simply tracking call volumes, without any analysis of the time spent by units in responding to these calls, does not provide a comprehensive picture of each district's workload.

SFPD staffing practices result in persistent mismatches of officers to workload across the ten districts

For our workload analysis, we have constructed two measures to examine how the Department currently allocates available staff across the ten districts in response to variance in workload demands related to responding to calls for service. Our first measure is the ratio of the total time patrol officers are responding to calls to the total available patrol time for all units assigned to patrol functions. This includes car sector, foot beat, housing, homeless response, and

school resource officers. The second measure is the ratio of time spent responding to calls for service divided by total available patrol time for car sector only.

To calculate the various ratios across the ten districts, we reviewed dispatch data from the Department of Emergency Management to calculate the amount of time patrol officers were occupied with responding to calls for service. We then calculated the ratio of call for service time as a percentage of the total shift hours of officers available to respond to calls for service. . The 2008 PERF report included a similar analysis. The results of our workload analysis are presented in Exhibits 1.1 – 1.4, which display the percentage of on-duty time patrol officers are, on average, responding to calls for service.

Our core workload measure for all patrol officers - e.g. the time a Police unit is engaged in responding to a call for service, and hence is unavailable to respond a different call or engage in self-initiated activities – for all officers on patrol fell from 34.4 percent in the prior six-month sign-up period (March 2017 – September 2017) to 27.5 percent¹ in the most recent sign-up period we examined (September 2017-Ferurary 2018). The pattern over the last four sign-up periods is shown in Exhibit 1.1. In prior periods, call for service time varied from 34.4 percent to 35.7 percent. This is well within the levels recommended by Police staffing experts (discussed below). Taken at the level of the patrol staff as a whole, there is no evidence over the last several years that the Department’s patrol operation has insufficient resources to accomplish its stated public safety objectives. Moreover, recent increases in staffing levels have contributed to a decline in the amount of total patrol time consumed by responding to calls for service.

Exhibit 1.1: Total Citywide Call for Service Time in the Four Most Recent Sign Up Periods

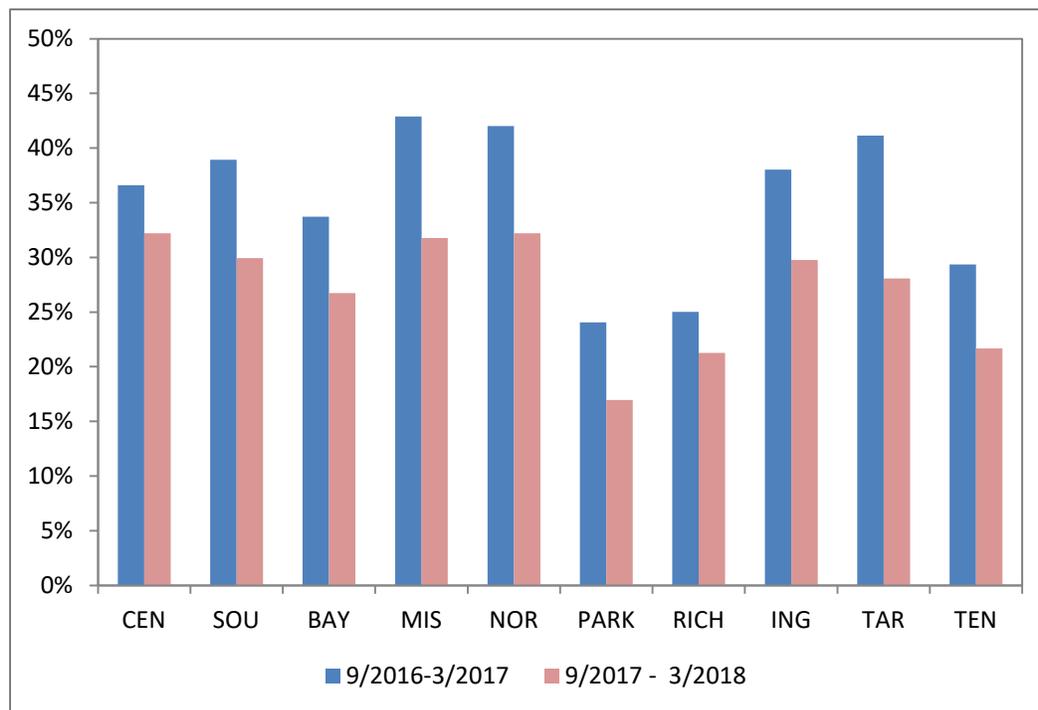
	March 2016- Sept 2016	Sept 2016- March 2017	March 2017 - Sept 2017	Sept 2017 - March 2018
Call for Service Time	34.4%	35.7%	34.4%	27.5%

Source: BLA analysis of dispatch data and Police staffing data

As shown in Exhibit 1.2 below, significant variance exists between Police districts in the average amount of total available patrol time during which officers are responding to calls for service. On average, call for service time in the most recent six-month assignment period in the Mission, Central and Northern districts is more than 30 percent compared to 22 percent in the Richmond and 17 percent in the Park districts.

¹ This represents a 20 percent reduction in the amount of time that Police officers spent responding to calls for service between the two six-month periods.

Exhibit 1.2: Comparison of Call for Service Time by District in 2016 and 2017



Source: BLA analysis of dispatch data and Police staffing data

Exhibit 1.3 show the call for service time as a percentage of total planned staffing allocations as stated at the beginning of the each of the last four sign-up periods on the staffing memorandum. We see that prior to the most recent period, the average call for service time, here measured as the ratio of total time spent responding to calls for service relative to the planned allocation of staff to car sectors proposed by the district captains at the beginning of the six month sign-up period, were quite stable, varying between 37.3 and 37.5 percent. The ratio falls to 29.8 percent for September 2017 to March 2018 staffing period as indicated on the district level staffing memos. As we will show below, this level is below the ratio recommended by Police Executive Research Foundation in their 2008 review of staffing practices of the SFPD.

Exhibit 1.3: Total Citywide Call for Service Time, Car Sector Only, Last Four Sign-up Periods

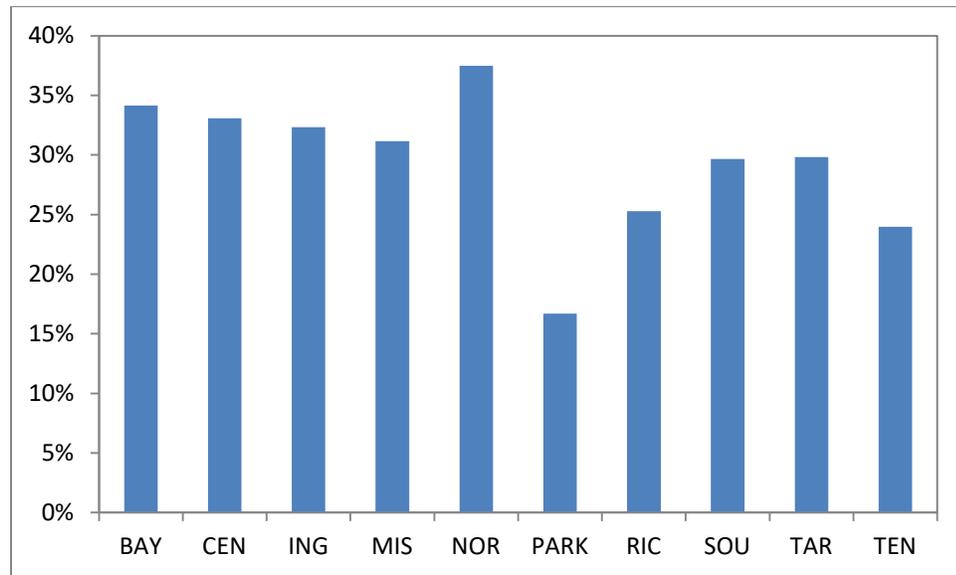
	March 2016- Sept 2016	Sept 2016- March 2017	March 2017 - Sept 2017	Sept 2017 - March 2018
Call for Service Time	37.4%	37.4%	37.5%	29.8%

Source: BLA analysis of dispatch data and Police staffing data

Exhibit 1.4 call for service time for car sector only at each Police district in the Sept 2017 to March 2018 sign-up period. Similar to the ratios for all patrol staff, there is significant variance across the districts. Average call for service time ranges from

a low of 17 percent for Park to a high of 37.5 percent for Northern district. While the variances for car sector only observed across the districts is less than for all patrol units, the size of the discrepancies indicate the Department could improve its planned district level staffing allocations to better match actual workload demands.

Exhibit 1.4: Call for Service Time, Car Sector Only, by District, Sept 2017 to March 2018 Sign-up Period



Source: BLA analysis of dispatch data and Police staffing data

Exhibit 1.5 compares the total time spent responding to calls for service for car sector patrol only to staffing ratios that were recommended in the 2008 Police Executive Research Foundation report. The second and third columns show the citywide call for service time over each of the last four periods, and the percentage of calls for service handled by car sector officers over the last four sign-up periods. Column four is the average call for service time that was recommended by PERF in the 2008 report under the assumption that car sector patrol handle 90 percent of all calls. In all four sign-up periods, the Department has overstaffed the car sectors relative to the recommended levels. In addition, as expected, the recent addition of new sworn personnel led to a significant reduction in average time spent responding to calls for service. The conclusion is that SFPD car sectors are currently significantly overstaffed relative to previously recommended levels.

**Exhibit 1.5: Recent Car Sector Call for Service Time and PERF
Recommended Call for Service Time Targets**

Sign-up Period	Actual Call for Service Time	% Calls for Service handled by Car Sector	PERF Recommended Call for Service Time	Difference
Sept 2017 - March 2018	29.8%	88.0%	40.0%	10.2%
March 2017 - Sept 2017	37.5%	90.1%	40.0%	2.5%
Sept 2016 - March 2017	37.4%	89.9%	40.0%	2.6%
March 2016 - Sep 2016	37.4%	89.6%	40.0%	2.6%

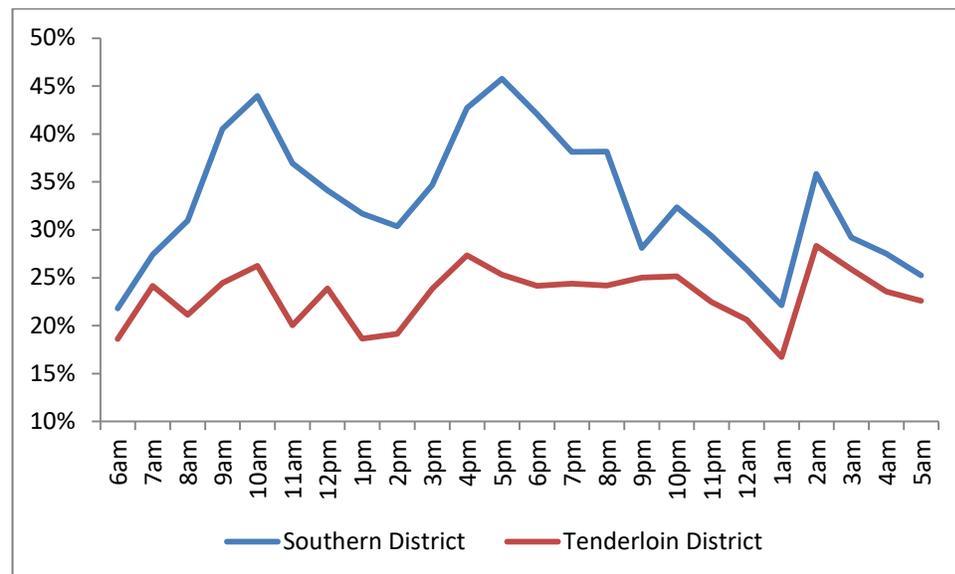
Note: In column labeled Difference, positive value indicates car sectors are overstaffed relative to PERF recommended call for service target. PERF recommended call for service time is based on car sector patrol handling 90% of the call for services (measured in minutes).

Source: BLA analysis of DEM dispatch data and SFPD staffing data; 2008 PERF assessment of SFPD

The mismatch between district staffing allocations and time responding to calls for service has persisted for at least a decade, as a similar pattern of call for service time disparity among the districts was identified in the 2008 PERF report. Despite a similar pattern being identified in 2008, the Police Department has not taken corrective action regarding staffing allocations; Police districts continue to have disparate percentages of call for service time.

Police districts also have differences in call for service time by time of day. Exhibit 1.6 below displays the average call for service time per hour for two of the ten districts over the course of the 24-hour working period. On average, between September 2017 and March 2018, call for service time over the course of 24 hours varied in the Tenderloin District varied by approximately 10 percentage points and in the Southern District varies by approximately 23 percentage points.

Exhibit 1.6: Comparison of the Variance in Call for Service Time by Hour in the Tenderloin and Southern Districts, September 2017 – March 2018



Source: BLA analysis of dispatch data and Police staffing data

Our analysis of call for service time shows that some Police districts are overstaffed, and others understaffed when measured in terms of the percentage of on-duty patrol time during which officers are responding to calls for service. In addition, current SFPD shift scheduling results in a mismatch in scheduled patrol time relative to actual workload demands over the course of the 24-hour period.

The Police Department needs to establish performance objectives for its staffing allocations

In our January 2016 report, “Best Practices Related to Police Staffing and Funding Levels,” we reported that workload based staffing decisions were considered best practice by experts in criminology and professional organizations.² Workload analysis allows law enforcement agencies to develop baseline measures of the actual level of demands being placed on existing Police resources.

Specifying performance objectives for patrol workload would involve setting targets for the allocation of patrol time between responding to calls for service, and more proactive forms of officer engagement such as self-initiated activities, targeted “hot spot” patrols, and time allocated to administrative duties. Performance objectives for officer time would allow the Department to align district staffing levels with those performance objectives.

² For discussion of the limits and problem of per capita, minimum staffing, and authorized level approaches, “Best Practices Related to Police Staffing and Funding Levels,” Budget and Legislative Analyst, January 2016. <https://bit.ly/2GdaXHE>

Without call for service time performance objectives, Police officers are distributed sub-optimally among the districts, as reflected in the variance of call for service time among the districts. The district staffing misallocation problem is a result of legacy staffing processes that do not account for variance in call for service time. Misallocation of Police staff is costly and leaves less money available to fund other vital public services.

No consensus on call for service time performance objectives

There is no current standard as to what defines a “best practice” performance objective. The 2008 Police Executive Research Foundation report on the Police Department’s staffing practices outlined a set of recommended performance objectives that ranged from 30 percent to 50 percent of total car sector patrol time dedicated to responding to calls. Authors of a widely cited Michigan State University report, conducted under the auspices of the US Justice Department COPS Program, constructed estimates of the number of officers required by two Departments to meet a variety of different performance objectives that are applied to evaluate data on calls for service and total time during which officers are out-of-service. For Delaware, Ohio, the Michigan researchers estimated the number of required officers using a standard of 25 percent of time responding to calls for service. For Rockford Ohio, the authors estimate the number of required officers using performance objectives set at 33 percent and 50 percent targets for time spent responding to calls for service.

As shown above in Exhibit 1.1 above, in two six-month assignment periods in 2016 and 2017, the San Francisco Police Department’s average call for service time for all patrol ranged between 27.5 percent and 35.7 percent. For car sector only, call for service time range from 29.8 percent to 37.5 percent over the same period. This is well within the call for service ranges set by the 2008 Police Executive Research Foundation Report, and the target ranges in the Michigan State University report for the COPS Program. . As seen in Exhibit 1.2 above, only three San Francisco Police districts had average all patrol call for service time in a 12-month period of more than 40 percent, and two districts had average call for service time in a 12-month period of less than 25 percent.

Conclusion

The percent of time that Police officers spend responding to calls for service is a primary indicator of the required number of patrol officers. While no universal standard exists, the 2008 PERF report recommended a range of 30 percent to 50 percent for car sector patrol.

In the most recent six-month assignment period from September 2017 to March 2018, the San Francisco Police Department’s average call for service time was 27.5 percent for all patrol officers. This is well below a 35 percentage call for service time objective, and indicates the Department could be staffing all sectors and units to achieve 35 percent performance objectives with fewer total personnel.

For car sector only, current call for service time is well below the PERF recommended level. For all patrol we see a decrease of 8 percentage points from the September 2016 to March 2017 call for service time of 35.7 percent. This is due to the combined effects of a decline in total call for service time and an increase in the number of officers assigned to patrol from 920 in September 2016 to 961 in September 2017.

The San Francisco Police Department could meet either a 30 percent or 35 percent call for service time performance with existing staff levels, which is within the range recommended by the 2008 PERF report of 30 percent to 50 percent. The Department would need to allocate 757 to 883 patrol officers to the 10 districts to meet the 35 percent to 30 percent call for service time target, subject to the requirement that staff is assigned in a manner that achieves a more effective equalization of call for service time across the various patrol units. In either case, the Department can achieve these objectives with significantly fewer staff than the 963 patrol officers assigned to the 10 districts as of March 2018, as shown in Exhibit 1.7 below.

Exhibit 1.7: Number of Patrol Officers Required to Meet 30 Percent and 35 Percent Call for Service Performance Target

Call for Service Time	Average Percent Call for Time	Number of Patrol Staff
Sept 2017- March 2018 Actual	27.5%	963
Target	30.0%	883
Actual > Target		80
Sept 2017- March 2018 Actual	27.5%	963
Target	35.0%	757
Actual > Target		206

Source: BLA analysis of dispatch data and Police staffing data

By setting call for service performance targets, the Department could better identify the optimal number of patrol staff that are needed, and more efficiently allocate the correct number of staff to meet the call for service performance targets in each district. More efficient staff allocations would free up Police resources for other public safety services.

Recommendation

The Chief of Police should:

Recommendation 1.1: Establish a call for service time target as the Department's baseline performance objective, and allocate patrol officers to the ten districts based on this call for service time performance objective.

2 Patrol Staffing Schedules

The Police Department uses a 10 hour shift and a 49 day rotation schedule for patrol officers assigned to the Police districts. This shift schedule results in wide discrepancies in the number of officers that are actually available for a shift on any given day within a Police district. This is particularly true for the car sectors, which handle the majority of service calls. Within each district, the daily car patrols are understaffed or overstaffed based on the point of time in the 49-day rotation cycle. The Department could achieve more efficient staffing allocations at the Police districts by adopting either an 8 hour, 5 day on 2 day off or a 10 hour, 4 day on, 3 day off work schedule.

The Police Department’s 49-day rotation results in uneven distribution of Police staff over the rotation

San Francisco Police Department patrol officers currently work ten-hour shifts. In addition, all officers are assigned to one of seven “Watch/Off groups” (W/O groups) that begin their shift assignments on consecutive days. Each W/O groups has four 10-hour shifts, beginning at 6 am, 11 am, 4 pm, and 9 pm. Each W/O group works on a shift rotation that follows the following sequence of days off, days on that repeats every 49 days: 4 days off, 4 days on; 4 days off, 4 days on; 4 days off, 5 days on; 3 days off, 5 days on; 3 days off, 5 days on; 3 days off, 5 days on. Under this schedule, patrol officers always have at least 3 consecutive days off and never work more than 5 consecutive days. Exhibit 2.1 below illustrates the first week of the watch-off schedule for one shift with Watch/Off group 1 starting the above 49 day rotation with the first four days off.

Exhibit 2.1 Patrol Shift Watch-Off Rotation: Week 1 of 49 Day Rotation (shaded days indicate W/O groups on duty)

	Sun	Mon	Tues	Wed	Thurs	Fri	Sat
Watch 1	Off	Off	Off	Off	On	On	On
Watch 2	On	Off	Off	Off	Off	On	On
Watch 3	On	On	Off	Off	Off	Off	On
Watch 4	On	On	On	Off	Off	Off	Off
Watch 5	On	On	On	On	Off	Off	Off
Watch 6	On	On	On	On	On	Off	Off
Watch 7	Off	On	On	On	On	On	Off

Source: BLA analysis

Officers in car patrols are generally assigned to W/O groups 1, 3, 4, 5, & 7. Foot patrol officers are assigned to W/O groups 2 and 6. To compensate for the gap in staffing caused by car patrol officers not being assigned to W/O groups 2 and 6, the district captain and staff try to distribute additional officers to W/O groups 1

and 7 - “tail days” – and fewer officers to W/O group 3, 4, and 5 – the so-called “fat days” of the 49 rotation.

However, the current 49 day W/O rotation cycles results in discrepancies in the number of patrol officers who are available on any given day. Exhibit 2.3 shows the number of car patrol officers assigned to the 6 am shift that are actually available on the district roster each day in the Richmond, Mission, and Bayview districts. Data is taken from the staffing roster grids provided by the Police districts. Several factors stand out. One, we see uneven levels of shift coverage within each of the three selected districts.¹ As shown in Exhibit 2.2 below, for the Bayview, the number of officers available to cover the sector varied by 90%; in the Mission, the number of available officers varies by 129 percent; and in the Richmond, the number of available officers varies by 56 percent.

Exhibit 2.2: Range of car patrol officer coverage for the 6am Shift in three Police Districts

	Bayview	Mission	Richmond
Percent Variance	90%	129%	56%

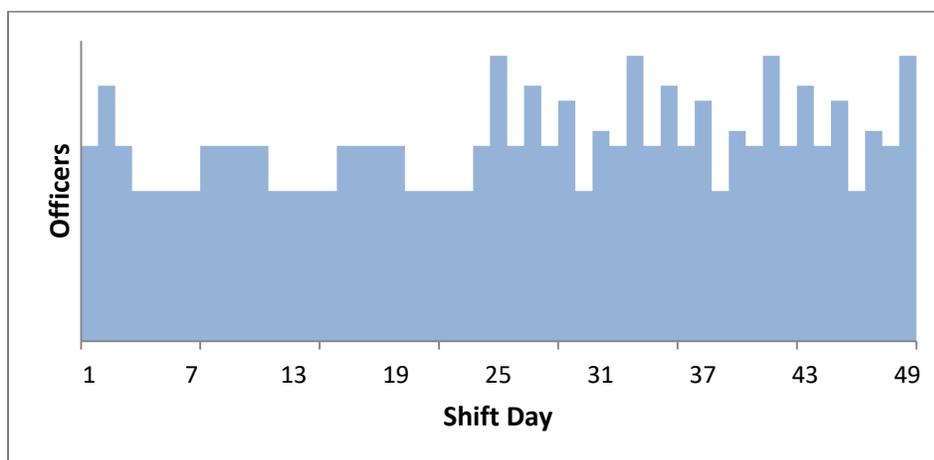
Source: BLA analysis of Police district staffing memoranda

Note: percentages refer to difference between maximum and minimum of scheduled officers.

The variance in the number of car sector patrol officers assigned to the 6 am shift and available each day of the 49 day rotation in the Bayview, Mission, and Richmond Police districts is further illustrated below:

Exhibit 2.3: Number of car patrol officers on schedule per day under current 49 day rotation: 6am shifts for Bayview, Richmond, and Mission

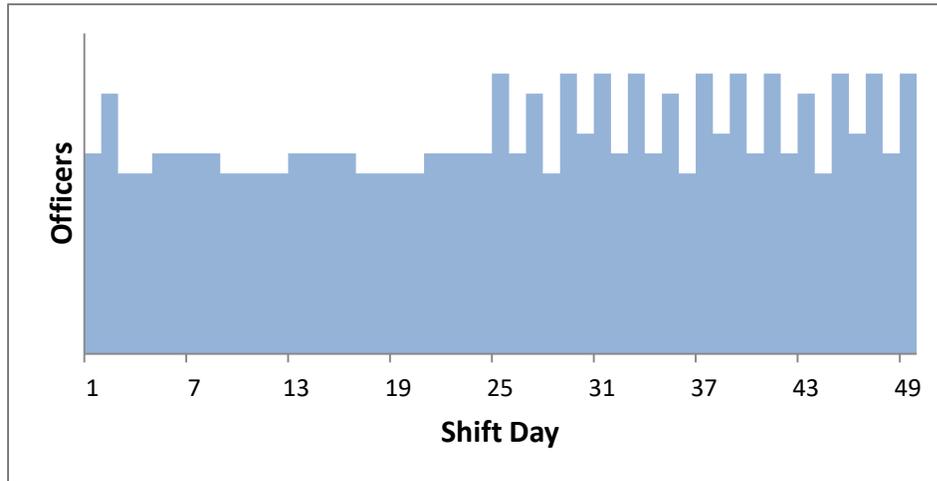
Bayview, 6 am Shift



Source: Police Department staffing grids, September 2017

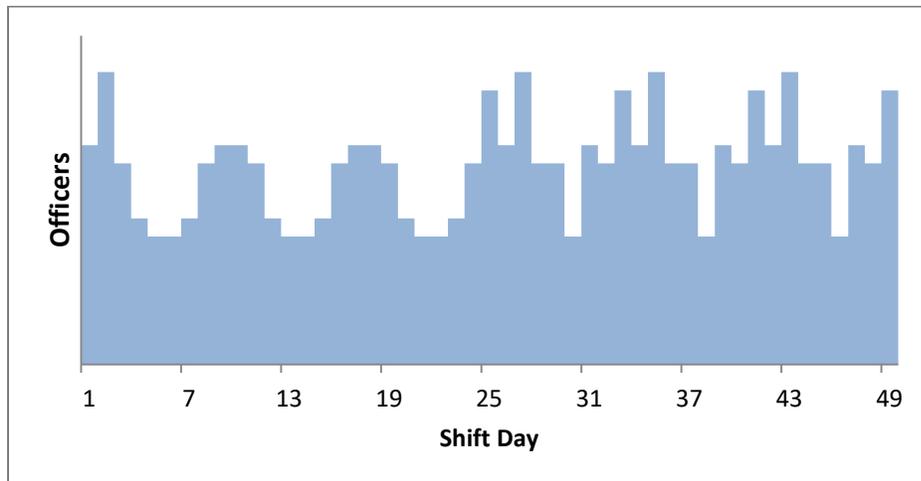
¹ Our analysis found that all districts show significant staffing discrepancies. We have selected three districts based on differences in overall level of demand for core Police services, demographic composition, the presence of tourists, and density of district retail and commercial corridors.

Richmond, 6 am Shift



Source: Police Department staffing grids, March 2017

Mission, 6 am Shift

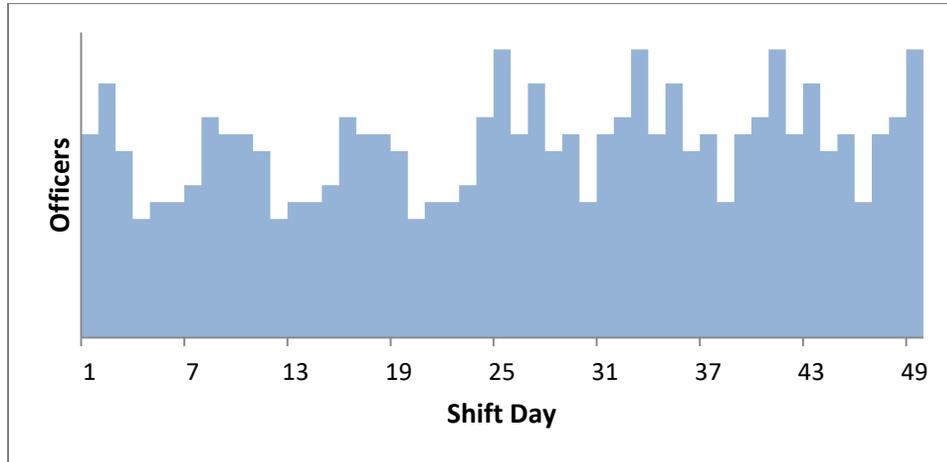


Source: Police Department staffing grids, January 2018

The other three patrol shifts in the Mission Police district have similar variances in the availability of car sector patrol officers over the 49-day rotation, as shown in Exhibit 2.4 below.

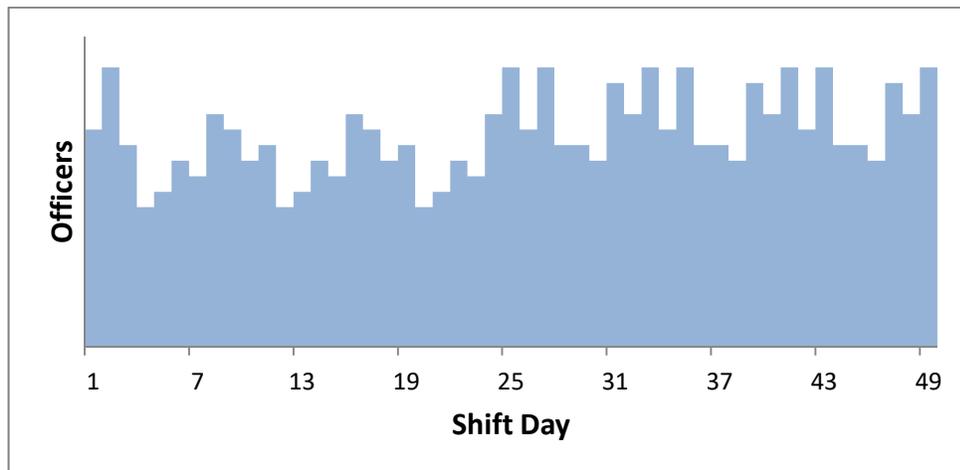
Exhibit 2.4: Number of Car Patrol Officers on Schedule per Day under Current 49 day Rotation Cycle: Mission, 11 am, 4 pm, and 9 pm shifts

Mission 11 am Shift

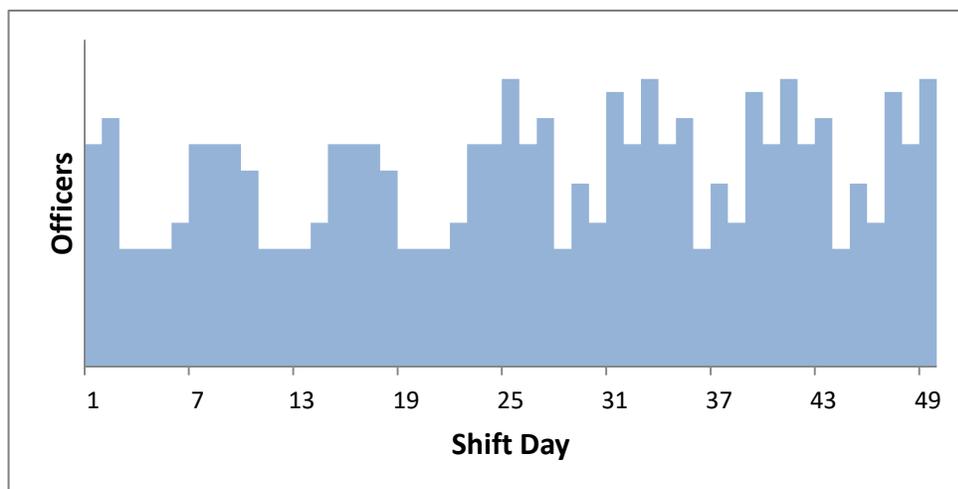


Source: Police Department staffing grids, January 2018

Mission 4 pm Shift



Source: Police Department staffing grids, January 2018

Mission 9 pm Shift

Source: Police Department staffing grids, January 2018

When viewed over the entire 49 days, staffing levels for shifts in each district show a distinctive oscillation pattern in the level of shift coverage. All districts have a higher percentage of “fat” days occurring in the second half of the 49 day period. In addition, in the second half of the rotation period, the variance between the lowest number and highest number of available patrol officers tends to increase. The reason for this peculiar pattern is complex, as it derives from the interactions between the 49 day rotation schedule, the fact that the sectors are primarily covered by W/O groups 1, 3, 4, 5 and 7, and the difference number of officers assigned to each of the W/O groups. However, all districts show a pattern of fluctuations in the number of officers that are available over the course of the 49 day rotation.

In addition, the current staffing schedule makes it impossible to schedule officers in a manner that would allow districts to ensure that certain days of the week are consistently staffed at higher levels. For instance, if a district wants to ensure that a higher percentage of officers are available for work on Friday and Saturday nights, there is no way to achieve this adjustment in any consistent way using the current 49 day rotation period.

Increasing the efficiency of the 49 day rotation

Not all Police districts have the same variance in the number of patrol officers available on any given day within the 49 day rotation. As noted above, the Richmond Police district’s staffing on the 6 am shift varied by 56 percent over the 49 day rotation and the Mission Police district’s staffing on the 6 am shift varied by 129 percent. The Chief of Police should evaluate the different staffing patterns and develop protocols for the Police district captains to more efficiently assign patrol staff to W/O groups and shifts.

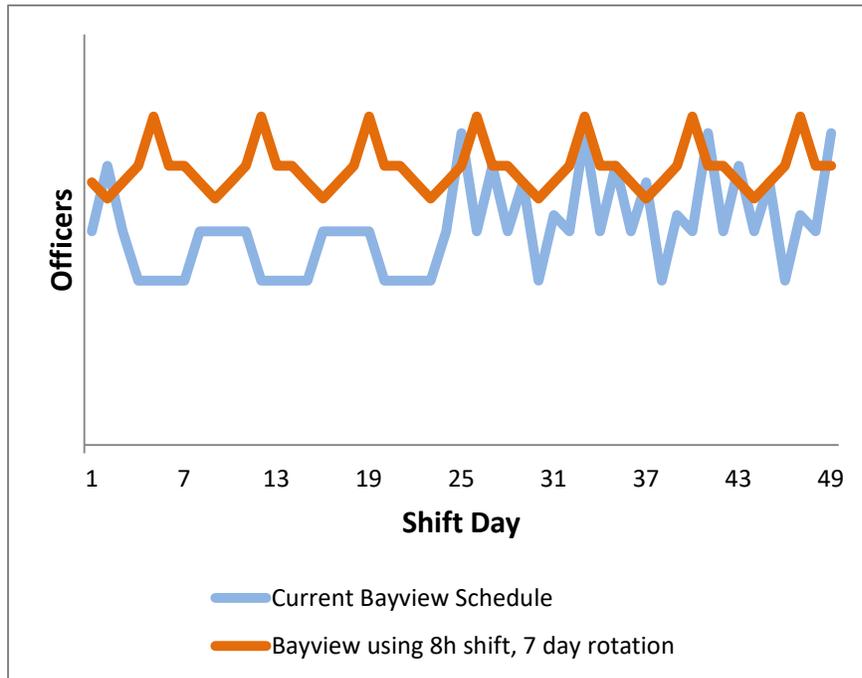
The Police Department could also increase the efficiency of the 49 day rotation by increasing the number of W/O groups. Currently, five W/O groups are assigned to

car sector patrol. Increasing the number of W/O groups would potentially reduce the variance in available staffing over the 49 days.

Implementing Fixed Schedules and/or 8 Hour Days

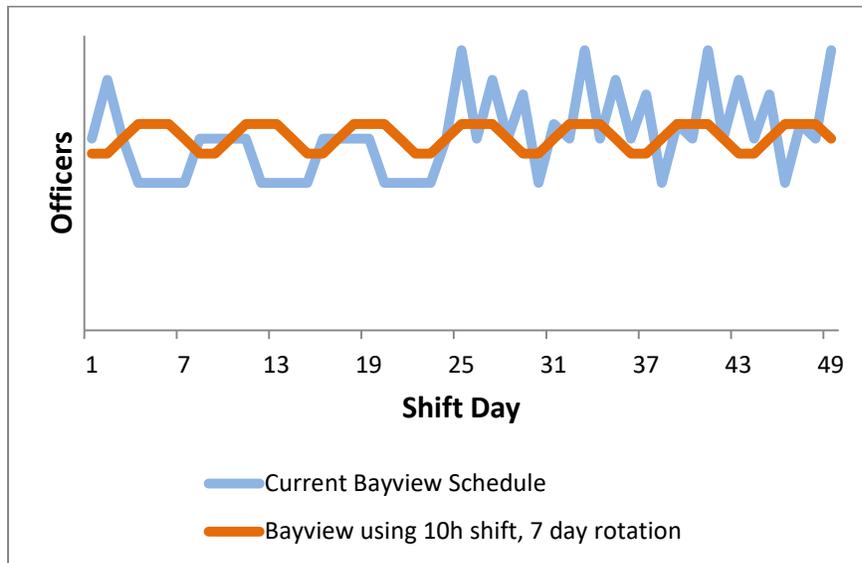
Many of these problems could be corrected by shifting to either an 8 hour, 5 day on, 2 day off (5/2) or a 10 hour, four day one three day off (4/3) shift schedule. To illustrate the significant efficiency gains available from the use of these schedules, we have constructed a comparison of the shift coverage in the Bayview achieved using the ten hour, 49 day rotation schedule with what could be accomplished by simply distributing an *identical number of total officers* in more or less even proportions to the seven W/O groups, with some adjustments to ensure the peak days always occur on Friday. The results are shown in Exhibit 2.5. The 8-hour, 5/2 and 10 hour, 4/3 schedule eliminate the extreme peaks and valleys that occur in the 10 hour, 49 day rotation schedule. They also eliminate the long-period oscillations inherent in the 49 day cycle. For example, if the Department were to adopt an 8 hour, 5/2 schedule, at least 15 officers would be on 6 am staffing schedule in the Bayview district on every day of the week (rather than the minimum of ten officers observed in Exhibit 2.2 above). In addition, the 8 hour, 5/2 and 10 hour, 4/3 schedules allow for a far more precise ability to adjust the number of officers that are available on days when the Department wants to maintain higher staffing levels (for instance, on Friday), should this option be deemed desirable.

**Exhibit 2.5: Bayview 6 am daily shift coverage using seven day work cycle
8 Hour day, 5 day on 2 day off schedule**



Source: BLA staffing analysis

10 Hour day, 4 day on, 3 day off schedule



Source: BLA staffing analysis

The Police Department modified its shift schedule in 2012

Changing shift schedules would not be unprecedented for the Police Department. According to a Police Department presentation to the Board of Supervisors' Budget and Finance Committee in April 2016, the 10 hour shift / 49 day rotation

has been in effect since 1986. In 2012, the Department moved sworn staff in the Administration Bureau to an 8 hour shift and sworn staff assigned to Special Operations to a 9 hour shift. According to the Police Department, 503 officers went from a 10 hour shift to an eight or nine hour shift, resulting in 16,000 additional officer days each year. The Department calculated that the effect of the transition away from a 10 hour shift was the equivalent of hiring 66 FTEs at no additional cost.

Other law enforcement agencies have modern shift and rotation schedules

Our benchmarking survey of selected comparison municipalities found that the 49 day rotation utilized by the Police Department to schedule personnel is not common practice. The Denver Police Department currently deploys officers using an 8 hour, five days on, two days off schedule. Denver adopted this schedule in 2016, shifting from a 10 hour schedule. The Denver Police Chief stated the change was being made in order to make more efficient use of existing staff resources. The Seattle Police Department currently uses a 9 hour shift, with officers working a rotation of four days on, two days off. Portland utilizes a 10 hour work day, four days on, three days off schedule rotation.

Adopting either a 4/3 or a 5/2 schedule would require the Department to institute certain adjustments to ensure officers do not end up with no regular weekends (Saturday and Sunday) off over an extended period. This would involve either shortening the sign-up period, or some other adjustment within the sign-up period. Given that other Police departments utilize eight hour, 5/2 and ten hour 4/3 schedules, we do not believe this is a substantive barrier to adopting a more efficient staffing schedule. In addition, if the Department and Police Officers Association (POA) were to agree to adopt a 5/2 schedule, this could involve modifications to the current Memorandum of Understanding between the City and the POA.

Recommendations

The Chief of Police should:

Recommendation 2.1: Evaluate existing W/O group and shift assignments by Police district and develop protocols for the Police district captains to more efficiently assign patrol staff to W/O groups and shifts.

Recommendation 2.2: Adopt either an 8 hour, 5/2 or a 10 hour, 4/3 weekly work schedule to improve the consistency of daily staffing in the Police Districts.

3 The Police Department's Span of Control

The span of control between sergeants and patrol officers is highly variable across the Police districts. The spans of control are typically below the 8:1 threshold level recommended by the Commission for Accreditation of Law Enforcement for most districts. These disparities indicate inconsistent and less than optimal use of staff time devoted to supervision of patrol personnel. The Department could improve the span of control ratios in its patrol operation by modifying its deployment schedule.

The Police Department has a low span of control in its Patrol Operation

Span of control refers to the number of field staff per supervisor. A reduction in the span of control at the district level means that more sergeants are supervising fewer officers assigned to patrol. A rise in the span of control indicates that there are more field personnel for each supervisor. If the span of control is too high, this can result in lack of adequate supervision, reduced accountability, and inability to ensure consistent implementation of Departmental policy. Insufficient supervision can also result in officer demoralization, due to insufficient feedback and guidance on departmental expectations, and lack of timely, constructive feedback on ways to more effectively carry out employee's assigned duties. If the span of control is too low, this can result in superfluous managerial and administrative functions that do not contribute to the actual improvement of officer oversight and supervision.

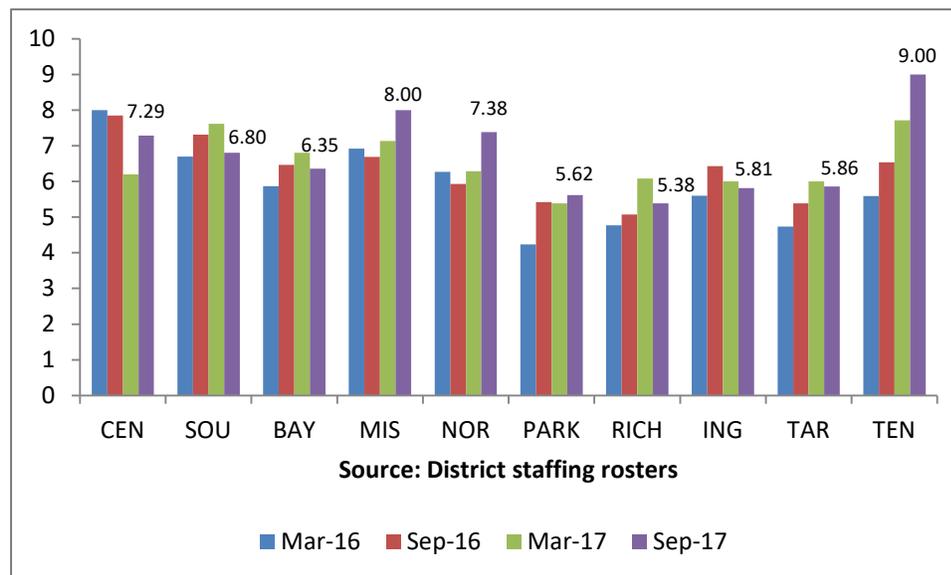
Spans of control differ among law enforcement agencies. The Commission on Accreditation of Law Enforcement Agencies (CALEA) recommends that the span of control does not exceed an 8:1 ratio (that is, eight officers to one sergeant).¹ The Kansas State University Police Department conducted a survey of law enforcement agencies in 2006.² The results were published in *The Police Chief* in October of that year. Police agencies were asked about span of control standards in their departments. The average span of control for the 140 responding agencies in the Kansas State University survey was 7:1 (that is, seven officers to one sergeant).

As seen in Exhibit 3.1, the span of control, measured as the ratio of sergeants to patrol officers assigned to each Police district is lower than the than the CALEA recommended 8:1 span of control in every Police district in September 2017 except for the Mission or the Tenderloin. In addition, the spans of control for every Police district except Central increased between the March 2016 sign-up period and the September 2017 sign-up period. The increase in the span of control is due almost entirely to new hiring of sworn staff.

¹ Standards for Law Enforcement for Law Enforcement Agencies, National Institute for Criminal Justice, August 1983.

² Lane, Troy, "Span of Control for Law Enforcement Agencies", *Police Chief*, Volume 73 (10), 2006,

Exhibit 3.1: Span of control, Sergeants to all patrol officers, past four sign-up periods (September 2017 values labeled)



Source: San Francisco Police Department staffing rosters

As shown above in Exhibit 3.1, there is significant variance in the span of control among the ten Police districts. For instance, in the September 2017 sign-up period, the span of control ranged from a low of 5.38 officers per sergeant in the Richmond Police district to a high of 9.0 officers to sergeants in the Tenderloin Police district. Relative to the best and common practices discussed above, some districts, such as Richmond and Taraval, have a span of control far below levels required to provide proper oversight and guidance to field personnel. By contrast, the span of control for Central and Tenderloin are at, or exceed, the maximum recommended levels.

The variance in the span of control by district is due to the Department's current staffing practices

The discrepancies we observe in the span of control across districts are due to the interaction of set of multiple and complex factors. One, the lack of a workload based staffing analysis, Discussed in Section 1, leads to high variance staffing levels relative to calls for service. Some districts are chronically under- or overstaffed relative to level that would even out the time spend responding to service calls across the districts.

Second, the Department has established the expectation that supervising Sergeants are assigned to a single shift based watch-off group (W/O group), and follow this W/O group over the entire course of the 49-day rotation cycle. Given the Department's current W/O staffing schedules,³ the effect is to create rigidities

³ The Department's current schedule is arranged so that patrol shifts are covered by officers in the 1, 3, 4, 5, and 7 W/O groups.

in the span of control because sergeants are assigned to a shift and W/O schedule, as opposed to actual officer staffing levels. Districts and shifts that have lower number of officers in each of the W/O groups will tend to have a higher ratio of supervisory personnel, due to the expectations set out by the Field Operations Bureau that supervisors are assigned to the W/O groups. The result is uneven supervision spans of control seen in the significant variances at the district level. However, as discussed below, significant improvements could be achieved through adoption of either a five or four day workweek for nonsupervisory patrol personnel and by placing supervising sergeants on a staggered fourteen day schedule, shown below, to maximize the coverage of supervised officer personnel.

Improving the Police Department's Span of Control

The span of control for the Department's patrol operation could be improved by the following reforms to patrol scheduling:

1. Rescheduling patrol officers to use either an eight hour, five work days per week rotation or a ten hour four work days per week work schedule, with the five W/O groups assigned a roughly even number of personnel.
2. Placing supervising sergeants on an overlapping schedule with one sergeant working a five day on, two day off, three day on, four day off, and the other sergeant working a five day on, four day off, three day on, two day off schedule (see below), so that sergeants supervise specific shifts rather than watch-off groups.

The effects of implementing these changes are shown in Exhibit 3.2. Officers would work an 8 hour, 5/2 schedule. To rebalance the span of control, sergeants would no longer be assigned to W/O groups, but would instead work a staggered fourteen day schedule.

The schedule shown in Exhibit 3.2 is a rotation that allows two supervising sergeants, to sequence their on/off schedules to achieve full coverage of all 14 days of a shift during a two week rotation schedule. The shifts are then combined so that only one sergeant is on the schedule each day on six of the seven days, and both sergeants are on duty on one day of the week. This allows two sergeants to achieve full coverage of all days over the 14 day period.

Exhibit 3.2: Supervising Sergeant Schedule modification to increase span of control

Shift Schedule Using 5 day on 2 days off, 8 hour shift														
W/O group	Su	M	T	W	Th	F	Sa	Su	M	Tu	W	Th	F	Sa
1	Off	On	On	On	On	On	Off	Off	On	On	On	On	On	Off
2	Off	Off	On	On	On	On	On	Off	Off	On	On	On	On	On
3	On	Off	Off	On	On	On	On	On	Off	Off	On	On	On	On
4	On	On	Off	Off	On	On	On	On	On	Off	Off	On	On	On
5	On	On	On	Off	Off	On	On	On	On	On	Off	Off	On	On
6	On	On	On	On	Off	Off	On	On	On	On	On	Off	Off	On
7	On	On	On	On	On	Off	Off	On	On	On	On	On	Off	Off
# of W/O groups on schedule	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Modified Sergeant Schedule														
	Su	M	T	W	Th	F	Sa	Su	M	Tu	W	Th	F	Sa
Sgt. 1	Off	Off	Off	On	On	On	On	On	Off	Off	On	On	On	Off
Sgt. 2	On	On	On	On	Off	Off	Off	Off	On	On	On	Off	Off	On
# Sgt.'s on duty	1	1	1	2	1	1	1	1	1	1	2	1	1	1
Supervision Assignments														
Sgt. 1 will work with W/O groups 2, 3, & 4 on 6 to 8 of these officers' scheduled days														
Sgt. 2 will work with W/O groups 5, 6, and 7 on 6 to 8 of these officers' scheduled days														
Both Sgt.'s will supervise W/O group 1 on 6 (non-overlapping) days														

Source: BLA analysis

The proposed supervision structure shown in Exhibit 3.2 would allow two sergeants to supervise one patrol shift rather than the five (one sergeant per each patrol watch-off group: 1, 3, 4, 5, & 7) currently scheduled under the Department’s current staffing procedures. This would reduce the variance across districts and shifts in the patrol span of control, and realize greater efficiencies in the allocation of the working hours of sergeants.

Recommendation

The Chief of Police should:

Recommendation 3.1: Subsequent to elimination of the 49 day rotation period, re-align the span of control by placing supervisors on a staggered fourteen day schedule.

4 Overtime Internal Controls

The Police Department does not sufficiently control the use of overtime, especially overtime for arrests and investigations that extend shift hours. Total overtime hours increased by 57 percent between FY 2010-11 and FY 2016-17. General Fund overtime expenditures increased from \$14.2 million in FY 2014-15 to \$20.6 million in FY 2016-17.

Both the Department and the City have policies to limit individual overtime use. The Department requires pre-approval to work overtime hours and signed approval of the overtime timecard before payment is processed. However, these policies are not consistently enforced. Other policies limiting the number of hours an individual can work are also not consistently enforced; for example, the number of occurrences of sworn staff working more than 14 hours in a day increased from approximately 3,700 in FY 2010-11 to more than 9,800 in FY 2016-17.

The Police Department needs to improve its oversight and management of overtime through setting formal expectations for supervisors approving overtime; monitoring the use of overtime by Police district and type, responding to high overtime use; and better incorporating overtime controls into Police district and budget performance.

The Police Department does not sufficiently control overtime

The Police Department's General Orders and the Memorandum of Understanding (MOU) between the City and the Police Officers' Association define overtime eligibility for sworn staff. The City Administrative Code and Police Department Bulletins set limits on overtime use. The Police Department Bulletins also detail the Department's policies on approving and documenting overtime use. Appendix B summarizes these documents.

Increase in overtime hours

The Police Department's total overtime hours¹ increased by 57 percent between FY 2010-11 and FY 2016-17, as shown in Exhibit 4.1 below.

Exhibit 4.1: Percent changes in total sworn staff overtime hours

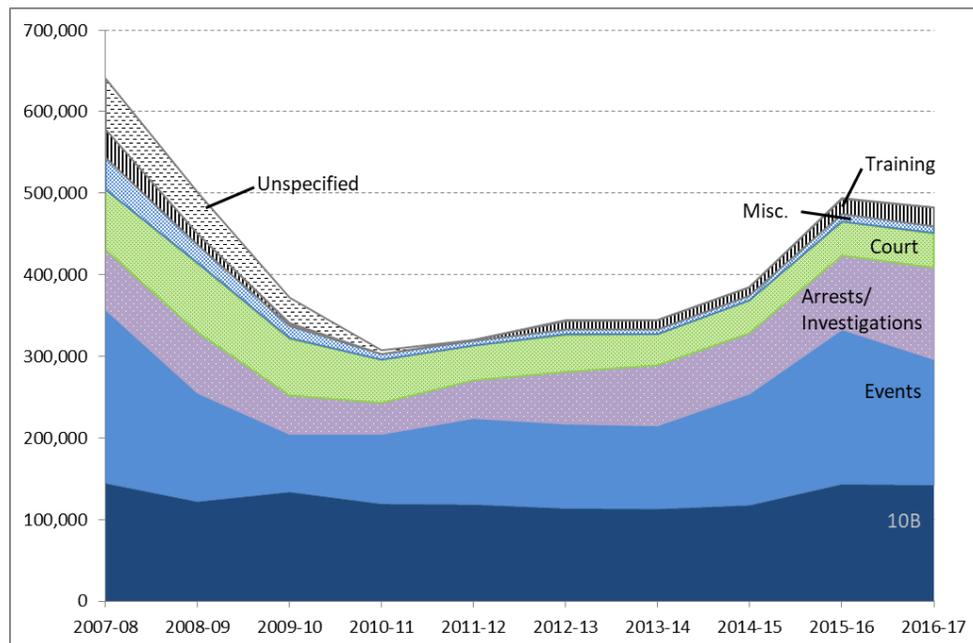
	Percent change
FY 2007-08 to FY 2010-11	-52%
FY 2010-11 to FY 2016-17	57%

Source: HRMS dataset from SFPD; BLA analysis

In the ten-year period between FY 2007-08 and FY 2016-17, overtime hours reached a minimum in FY 2010-11. Overtime in FY 2016-17 of approximately 480,000 hours was significantly less than overtime hours of approximately 640,000 in FY 2007-08.

¹ Throughout this section, our analyses of Department overtime usage exclude overtime hours worked by sworn personnel detailed to Airport bureaus, except where noted.

Exhibit 4.2: Total overtime hours worked by type, FY 2007-08 through FY 2016-17



Source: HRMS dataset from SFPD; BLA analysis

Note: “Unspecified” overtime includes (1) unspecified compensatory time and (2) unspecified overtime for pay. By FY 2011-12 no overtime was recorded as unspecified.

Events, arrests/investigations, and 10B² overtime are the three largest categories of overtime, making up 85 percent of overtime hours worked by sworn personnel in FY 2016-17, as shown in Exhibit 4.3 below. While the percentage of overtime due to events was generally the same in FY 2016-17 as in FY 2007-08, overtime due to arrests/investigations increased from 12 percent of all overtime in FY 2007-08 to 23 percent of all overtime in FY 2016-17, an 11 point increase. 10B overtime increased from 23 percent of all overtime in FY 2007-08 to 30 percent of all overtime in FY 2016-17.

² 10B overtime refers to Chapter 10B of the City’s Administrative Code, which states that any person, corporation, firm, or organization that is hosting a cultural, recreational, entertainment, or other event may request law enforcement services from the Department, subject to approval from the Chief of Police. The requesting organization or entity pays for the Police Department services requested under Chapter 10B, including overtime worked by sworn staff. Additional information about types of Police Department overtime is provided in Appendix B.

Exhibit 4.3: Events, arrests/investigations, and 10B overtime hours as a percentage of total overtime hours, FY 2007-08 and FY 2016-17

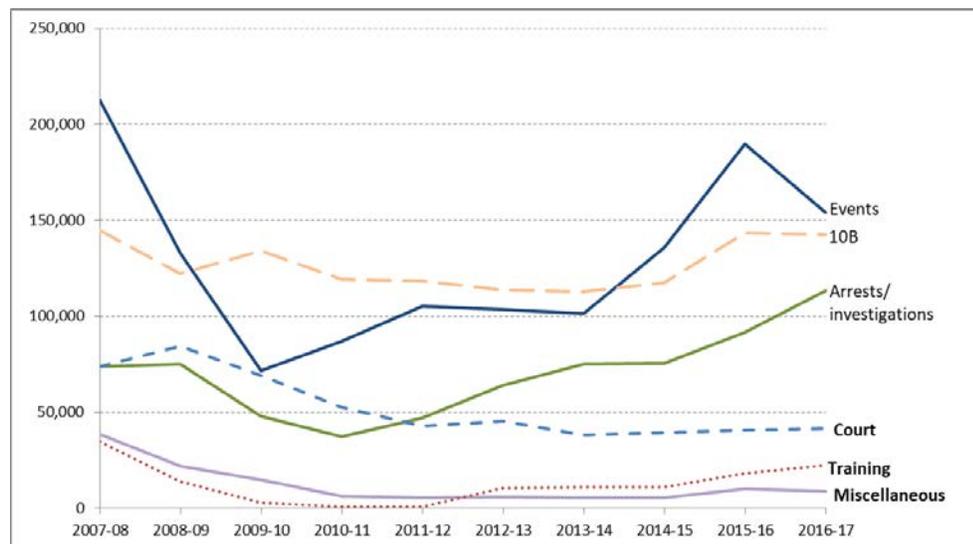
	Percent of total overtime	
	FY 2007-08	FY 2016-17
Events	33%	32%
Arrests/investigations	12%	23%
10B	23%	30%

Source: HRMS dataset from SFPD; BLA analysis

Increase in overtime hours due to arrests/investigations and events

As shown in Exhibit 4.4 below, events and arrests/investigations overtime hours are the two significant drivers in the increase in overtime hours between FY 2010-11, when total overtime was at a low, and FY 2016-17.

Exhibit 4.4: Sworn staff overtime hours worked by type, FY 2007-08 through FY 2016-17



Source: HRMS dataset from SFPD; BLA analysis

Events overtime hours reached a minimum in FY 2009-10 and subsequently increased by 115 percent between FY 2009-10 and FY 2016-17. (The spike in events hours in FY 2015-16 coincided with Super Bowl 50 in February 2016; however, this event was not the cause of the 115 percent increase, which was calculated as the percent increase between FY 2010-11 and FY 2016-17 hours.) Arrests/investigations overtime hours reached a low in FY 2010-11 and increased by 203 percent between FY 2010-11 and FY 2016-17.

Use of Reserve Officers for events

California law³ allows law enforcement agencies to deputize civilians as peace officers if they meet certain training requirements. Such reserve officers may be used to meet short-term staffing needs of the Department. The Department

³ Sections 830 and 836 of the California Penal Code.

utilizes reserve officers (all retirees from the Department) to supplement staffing at events, including Chinese New Year, Bay to Breakers, the Cherry Blossom Festival, and other neighborhood events.

The 2008 PERF Organizational Assessment of the Police Department recommended the expansion of the Reserve Officer program to complement the existing full-time force. However, the Department does not pay Reserve Officers for their time; all reserve officer time is “donated” voluntarily. As a result, reserve officers have only logged 6,167 hours since March 2016 with the Department. Increasing the amount of reserve officers available to staff events could reduce the amount of event-related overtime the Department incurs.

Impact of overtime for arrests and investigations

The average annual hours of overtime worked per sworn employee who worked overtime in a specific year decreased between FY 2007-08 and FY 2010-11 before increasing between FY 2010-11 and FY 2016-17, as shown in Exhibit 4.5 below. The average overtime hours, per staff member who worked overtime, increased by 45 percent for all types of overtime and by 165 percent for arrests/investigations overtime between FY 2010-11 and FY 2016-17.

Exhibit 4.5: Percent changes in the average annual overtime hours worked per sworn staff member, all overtime and arrests/investigations overtime

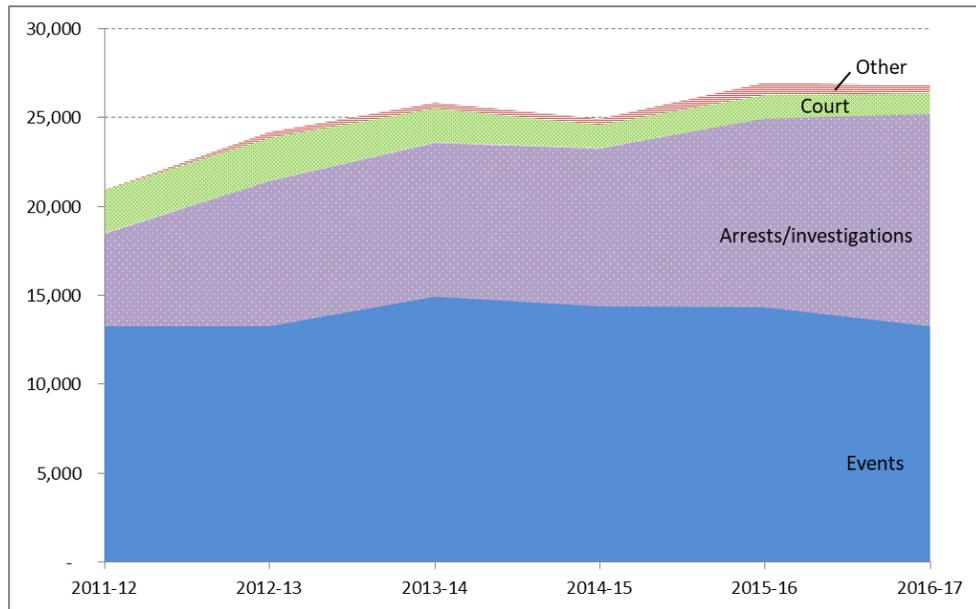
	Percent change, hours per sworn member, all overtime	Percent change, hours per sworn member, arrests/investigations
FY 2007-08 to FY 2010-11	-47%	-46%
FY 2010-11 to FY 2016-17	45%	165%

Source: HRMS dataset from SFPD; BLA analysis

Increase in overtime due to arrests/investigation by high users of overtime

Fifty-nine sworn individuals make up the top 10 percent of overtime users in the Department for five or six of the six years between FY 2011-12 and FY 2016-17, excluding 10B overtime hours and hours worked by individuals detailed to Airport bureaus. As shown in Exhibit 4.6 below, this group’s overtime usage grew by 27 percent between FY 2011-12 and FY 2016-17.

Exhibit 4.6: Total overtime use by the frequent top 10 percent of users, FY 2011-12 through FY 2016-17

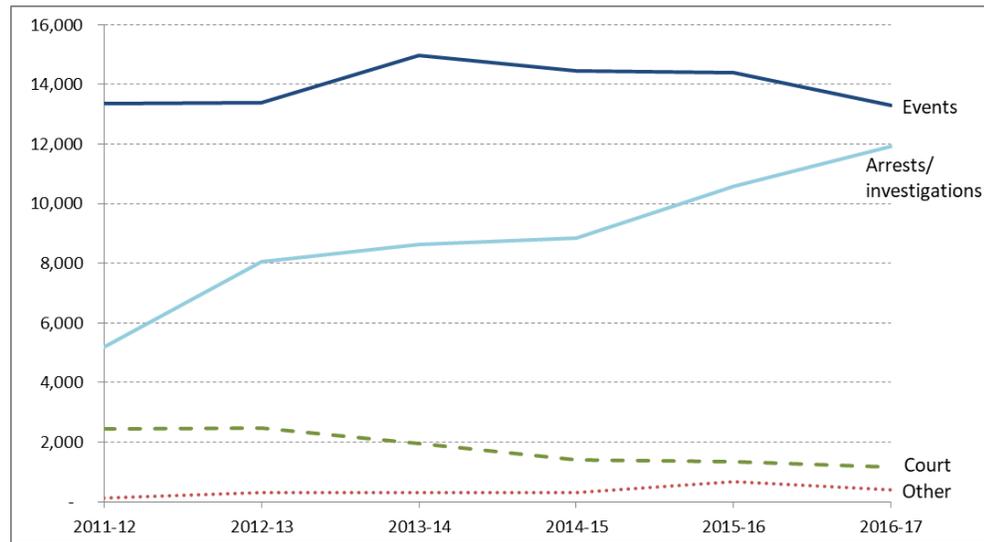


Source: HRMS dataset from SFPD; BLA analysis

Note: "Other" includes miscellaneous, training, and any unspecified overtime hours. 10B hours are not included.

The increase in total hours used by this group of frequent high users is due to a 131 percent increase in arrests/investigations overtime hours over the six-year period. As shown in Exhibit 4.7 below, the usage of overtime in other categories has been either stable or decreasing.

Exhibit 4.7: Overtime usage among the frequent top 10 percent of users, FY 2011-12 through FY 2016-17



Source: HRMS dataset from SFPD; BLA analysis

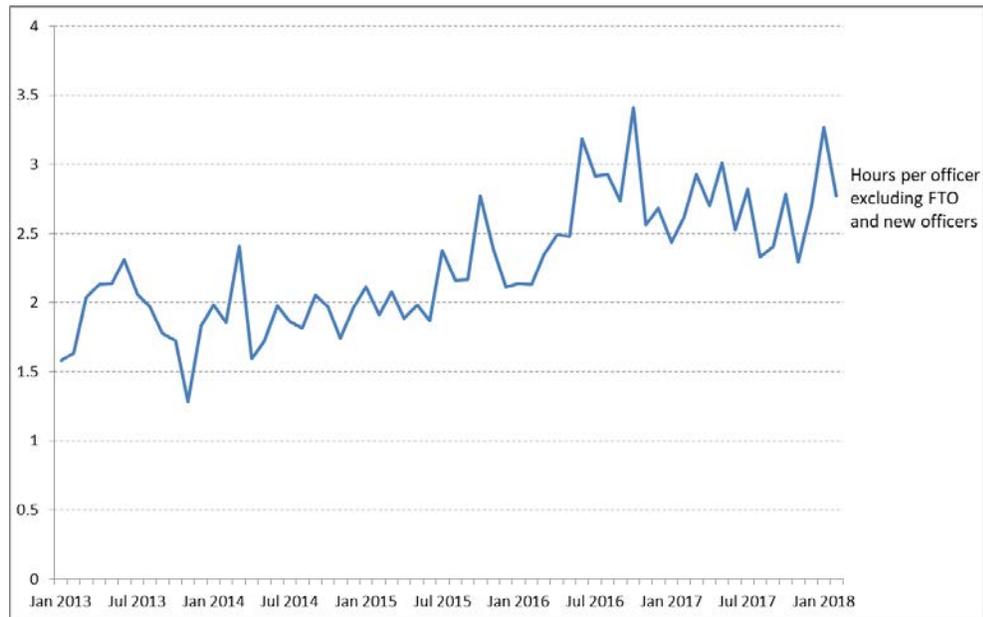
Note: "Other" includes miscellaneous, training, and any unspecified overtime hours. 10B hours are not included.

Increase in overtime hours due to arrests/investigations at district stations

The Department has attributed a portion of the increase in overtime hours to the high number of new recruits in the Department since the implementation of the Multi-Year Hiring Plan in fall 2012. According to the Department, new recruits contribute to overtime for several reasons, including the fact that new recruits take longer than experienced officers to complete routine tasks like writing reports and booking evidence, and the fact that the Field Training Officer (FTO) working with each new recruit spends extra time during his or her regular shift on revising reports and training.

However, even among officers who were not involved in recruit training as FTO officers and who were not new recruits in field training, the average hours of arrests and investigations overtime worked each month by officers at district stations has increased since January 2013, as shown in Exhibit 4.8 below. In other words, the increase in arrest and investigation overtime hours cannot be attributed solely to the presence of new recruits and higher demands on their training officers.

Exhibit 4.8: Average arrests/investigations overtime hours per officer at district stations excluding Field Training Officers and new recruits



Source: HRMS dataset from SFPD; BLA analysis

Need for more consistent policies and practices

As shown in the matrix below, the Department's policies do not consistently conform to recommended policies and practices recommended by the International Association of Chiefs of Police (IACP)⁴ and the National Institute of Justice (NIJ),⁵ and the Department's practices are not consistently in line with Department policies.

⁴ International Association of Chiefs of Police, National Law Enforcement Policy Center, "Overtime Model Policy," effective August 1999.

⁵ National Institute of Justice, Research in Brief, "Police Overtime: An Examination of Key Issues," May 1998.

Model policy or recommendation	SFPD or City policy	Sampling, data analysis, or policy analysis results
All overtime must receive advance authorization unless unreasonable due to emergency circumstances. (IACP)	All overtime shall be pre-approved by a supervisor or manager.	Pre-approval is given verbally and not recorded. The Department cannot enforce its policy that all overtime be pre-approved.
No task or function shall be performed on overtime that could otherwise be performed during regular work hours. (IACP)	Commanding Officers and Officers-in-Charge shall investigate the necessity of overtime by their members.	No documentation of the “necessity” of overtime on paper records.
Only overtime required to meet vital service demands of the department shall be authorized. (IACP)		
Managers should assist the immediate supervisors who approve shift extension overtime by providing them with updated and revised guidelines for approval and by reviewing their performance regularly. (NIJ)	None.	No training or criteria provided to first-line supervisors to determine whether the overtime is necessary.
All tasks and functions that require overtime shall be routinely evaluated in terms of their cost-effectiveness. Alternatives to accomplish these tasks or objectives shall be evaluated and implemented where appropriate. (IACP)	None.	The Department does not evaluate the cost-effectiveness of overtime usage.
Individual and summary overtime data shall be compiled and provided to supervisors and command personnel at least monthly. Commanders and supervisors shall monitor reports to identify unusual, unexplained, or disproportionate overtime expenditures. (IACP)	None.	Regular reports prepared for Command staff include summary overtime data but not individual-level data or data that would identify unusual or unexplained uses of overtime.
Police departments should analyze patterns of overtime expenditure by individuals, by units, and by the nature of the worked performed, and identify unusual payouts to individuals or units. (NIJ)		
None.	Staff may not work overtime hours in excess of Department or City maximums without prior approval.	SFPD hour and overtime maximums were exceeded at least 13,385 times in FY 2016-17, and occurrences have been increasing significantly since FY 2010-11.
All overtime worked shall be approved for payment by the designated supervisor. (IACP)	For an overtime card to be authorized, it must be certified by a supervisor and approved by the commanding officer.	In a sample of 219 overtime cards, there were at least nine occurrences of overtime cards that were missing required signatures, dates, times, or stamps.

Sources: (a) International Association of Chiefs of Police, Overtime Model Policy; (b) National Institute of Justice, Research Brief: Police Overtime; (c) San Francisco Department Bulletins 17-045, “Monitoring Overtime” issued 2/3/2017 and 17-112, “Overtime Rules and Reporting” issued 5/9/2017; (d) City Administrative Code Section 18.13-1; (e) BLA HRMS analysis, timecard sampling, policy review, and conversations with the Department.

The absence of recorded overtime pre-approval and formal overtime approval criteria limits the Department's ability to control unnecessary uses of overtime, particularly overtime incurred as a shift extension.

Need for improvement in approval and monitoring overtime use

Tracking overtime pre-approval

The Department's policy, consistent with best practices, requires prior authorization of overtime. However, according to the Department, the pre-approval of overtime is only given verbally and is not documented. The Department's overtime card does not contain a field for a supervisor to indicate whether or not the overtime worked was pre-approved. As a result, the Department is unable to assess whether employees claiming overtime compensation are obtaining pre-approval in accordance with Departmental policy or best practice, which limits the Department's ability to enforce its pre-approval policy and to monitor uses of overtime that were not pre-approved. According to Department staff, a supervisor will question an officer prior to signing overtime cards if the supervisor suspects abuse; however, that inquiry would only happen after the overtime has been worked.

Enforcing the requirement that overtime be pre-approved is essential to controlling unnecessary uses of overtime, particularly overtime that occurs as a shift extension. When employees request pre-approval of overtime, supervisors have the opportunity to assess whether the task could be done during regular work hours and whether the overtime is necessary to meet vital service demands. If the supervisor determines that the task does not meet the criteria for overtime usage, the supervisor can dis-allow the use of overtime before the overtime has been worked, which controls unnecessary use of overtime. The overtime card contains fields for employees to describe the nature of the work and provide comments; however, in the sample of overtime cards reviewed by the audit team, these fields were often left blank, which leaves no record by which to assess whether the overtime was necessary.

Formal criteria and supervisors' training

According to the IACP, first-line supervisors "are the first line of defense for ensuring that agency policy is followed and that reporting and related requirements are fulfilled."⁶ Similarly, the NIJ advises that immediate supervisors have responsibility to approve shift extensions, and that managers can assist these immediate supervisors by providing updated and revised guidelines for approving shift extensions and by reviewing their performance periodically.⁷

Sworn staff responsible for approving overtime (primarily sergeants but also lieutenants and captains) do not receive formal training or written guidance on how to determine whether or not overtime should be approved. The Department does not provide criteria for supervisors to use when determining whether a

⁶ International Association of Chiefs of Police, National Law Enforcement Policy Center, "Overtime Model Policy," effective August 1999.

⁷ National Institute of Justice, Research in Brief, "Police Overtime: An Examination of Key Issues," May 1998.

particular task qualifies as an appropriate use of overtime or could not be performed during regular work hours, as recommended by the NIJ. Supervisors are not evaluated or otherwise held responsible for overtime usage that they approve and are not assessed on their effectiveness at controlling overtime, which is another control recommended by the NIJ.

Monitoring and controlling overtime due to shift extensions

As discussed earlier in this section, overtime related to arrests and investigations, which frequently occurs as a shift extension, is the second-largest contributor of overtime hours overall and has significantly increased between FY 2010-11 and FY 2016-17, both in total hours and in its share of total hours. Furthermore, the frequent high users of overtime—the group of 59 individuals in the top 10 percent of overtime users for five or six of the last six years—have increased their arrests and investigations overtime hours by 131 percent between FY 2010-11 and FY 2016-17.

A lack of criteria for approving shift extension overtime hours and adequate enforcement of the Department's pre-approval policy for shift extension overtime likely results in unnecessary overtime expenditures and may have allowed for the increase in arrests and investigations overtime hours.

Need for improvement in management oversight

Command-level staff do not receive and review overtime reports that include information that would allow for the identification of unnecessary, unexplained, or disproportionate overtime use or overtime abuse, as recommended by the IACP and NIJ. The Department does not assess the cost-effectiveness of overtime, as recommended by the IACP.

Insufficiency of overtime report to identify high use by individuals or stations

The IACP model overtime policy recommends that both individual and summary overtime data be provided to agency supervisors and command personnel on at least a monthly basis, and that commanders and supervisors monitor reports to identify unusual, unexplained, or disproportionate overtime expenditures. Similarly, the NIJ states that because overtime abuses typically occur in the form of large and undetected overtime earnings by individuals or units, the Department should analyze patterns of overtime use by individuals, by units, and by the nature of the work performed, with the goal of identifying unusual payouts to individuals or units.

Using data from HRMS, the Department prepares bi-weekly overtime reports that present summary pay period and year-to-date information on the Department's overtime usage. The reports are distributed to captains and higher ranks. Prior to FY 2017-18, the reports presented information that included General Fund overtime hours allotted and used by bureaus, and all funds overtime hours used by bureaus for the pay period. Starting in FY 2017-18 the bi-weekly overtime reports have been more detailed and also include overtime allocation and usage by station and by overtime category.

The bi-weekly reports do not include any information on individual overtime usage or present data or statistics that would allow for the identification of unusual, unexplained, or disproportionate overtime usage, as recommended by the IACP and the NIJ. As a result, the reports, although useful for other purposes, are not an effective control to identify and prevent overtime abuse by individuals or units.

The analysis of the frequent high users of overtime presented earlier in this section demonstrates the importance of such monitoring. Overall overtime usage by this group has increased by 27 percent over six years, due almost entirely to a 131 percent increase in arrests and investigations overtime (shown in Exhibit 4.7 above). Additional detailed analyses focusing on high users of arrests/investigations overtime by station would also assist the Department in identifying patterns of potentially unnecessary overtime usage by individuals and units. In addition, the analysis would allow Department leadership to evaluate the performance of district station captains in controlling overtime.

Monitoring trends in the overtime usage of high users would allow the Department to identify and investigate cases of potential overtime abuse. Additional analyses that would aid in the identification of overtime abuse, as recommended by the IACP, include reporting and assessments of:

- Disproportionate overtime by individual officer(s) engaged in or assigned to the same task/function;
- Significant and unexplained changes in overtime expenditures when compared to similar periods of time;
- Significantly higher overtime costs for completion of the same or similar activities or tasks previously performed; and
- Expenditure of overtime at a rate that could exceed or negatively affect the agency's budget or that of individual units, programs or functions.

No assessment of the cost-effectiveness of overtime

The IACP recommends that all tasks and functions that require overtime be routinely evaluated in terms of their cost-effectiveness, and that alternatives to accomplish these tasks or objectives be evaluated and implemented where appropriate.

According to the Department, no assessment of the cost-effectiveness of overtime usage or the tasks or functions that require overtime is prepared for Department leadership, either routinely or in response to specific situations requiring the use of overtime. However, according to the Department's fiscal division, the Department's fiscal division conducts informal cost-benefit analyses and assesses the cost-effectiveness of overtime on an ad-hoc basis when requested.

Need to enforce overtime controls

The Department inadequately enforces its policies and controls designed to manage overtime hours and limit overtime abuse.

Incidence of exceeding overtime limits

According to Department policy, sworn personnel cannot work more than 14 hours per day (for example, 4 hours of overtime in addition to a 10 hour shift) or more than 20 hours of overtime per week without prior written approval. In FY 2016-17, sworn employees worked more than 14 hours per day 9,807 times, a nearly 165 percent increase since FY 2010-11, as shown in Exhibit 4.9 below.

Exhibit 4.9: Occurrences of sworn personnel working more than 14 hours per day, FY 2007-08 through FY 2016-17

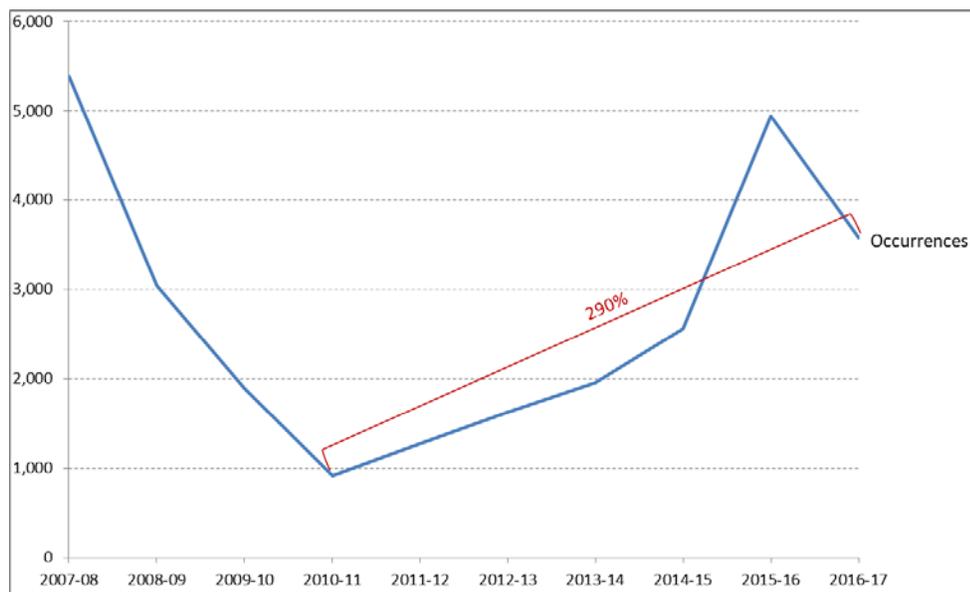


Source: HRMS dataset from SFPD; BLA analysis

Note: Hours include 10B overtime hours, which are included in the stated limit. Hours do not include secondary employment, which is not tracked by the Department.

In FY 2016-17, sworn personnel worked more than 20 hours of overtime in a week 3,578 times, an increase of nearly 300 percent since FY 2010-11, as shown in Exhibit 4.10 below. The 3,578 occurrences of overtime exceeding 20 hours per week in FY 2016-17 was a reduction from the nearly 5,000 occurrences in FY 2015-16.

Exhibit 4.10: Occurrences of sworn personnel working more than 20 hours of overtime per week, FY 2007-08 through FY 2016-17



Source: HRMS dataset from SFPD; BLA analysis

Note: Hours include 10B overtime hours, which are included in the stated limit.

Whether the occurrences in the exhibits above received prior written approval is not indicated in HRMS. Regardless of whether required prior approvals were obtained, Exhibits 4.9 and 4.10 above demonstrate that the controls on overtime hours and hours worked are not functioning as designed to minimize excessive overtime accumulation by individuals.

Insufficient enforcement of timecard approvals and time stamps

In the audit team's review of 219 paper overtime cards for one randomly-selected district station during one recent pay period, we found the following:

- Four non-court overtime cards, documenting a total of ten hours of overtime, were missing the required certification by a supervisor or manager.
- Five court timecards, documenting a total of nine hours of overtime, were missing the required attorney indication of starting or ending date or time, or a timestamp from the Court Liaison Unit.

These timecards were entered into HRMS and paid to staff despite the omission.

The Government Accountability Office's Green Book (GAO-14-704G) recommends that in monitoring internal control systems, management should undertake periodic evaluations, such as assessing internal control design and testing internal controls (16.06-07). Outcomes of ongoing and period evaluations should be measured against the established baseline, and corrective actions should be taken, as necessary (16.09). The examples from the above sample indicate that the Department does not adequately evaluate or enforce overtime

documentation on time cards to ensure appropriate approval and payment of overtime.

Prior Police Department efforts to reduce overtime

Between FY 2008-09 and FY 2010-11, the Police Department reduced the use of overtime by 50 percent, as shown in Exhibit 4.11 below. All categories of overtime decreased; the decline was not attributable to a decrease in one particular type of overtime but to a decrease in overtime overall. The reduction in overtime was independent of the number of full duty sworn staff; the average number of overtime hours per sworn staff member decreased by 46 percent during the same time period, as shown in Exhibit 4.11 below.

Exhibit 4.11: Total and average overtime hours and percent decreases

	FY 2008-09	FY 2010-11	Percent Decrease
Total overtime hours	379,302	188,142	-50%
Average overtime hours per sworn staff	127	69	-46%

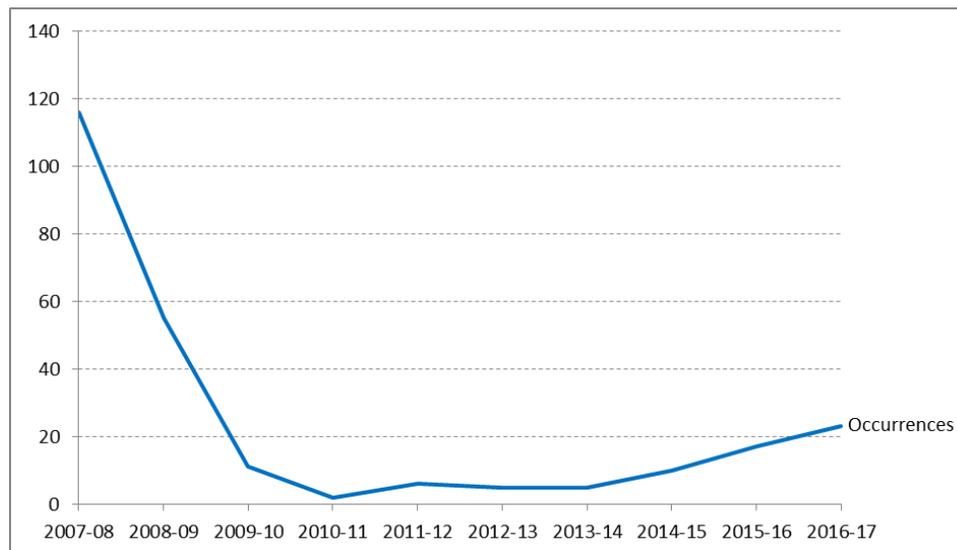
Source: HRMS dataset from SFPD; BLA analysis

Effective overtime controls

The Administrative Code limits overtime hours per employee to 520 hours per year for a full-time 2,080 hour per year employee unless approved by the Director of Human Resources.⁸ The 520 hour limit went into effect in October 2011 when the Administrative Code was amended to reduce the maximum permissible overtime hours from 624 to 520, and is reflected in Department Bulletin 17-112 "Overtime Rules and Reporting." Implementation of this policy successfully reduced the number of sworn staff working more than 520 overtime hours per year, from 116 in FY 2007-08 to 23 in FY 2016-17, as shown in Exhibit 4.12 below.

⁸ The 520 hour limit excludes 10B overtime.

Exhibit 4.12: Occurrences of sworn staff working more than 520 hours of overtime per year



Source: HRMS dataset from SFPD; BLA analysis

Note: Because the 520 hour limit was not in force before FY 2010-11, the excesses indicated in prior years do not necessarily represent violations of the City Administrative Code. Because annual overtime limits may be higher or lower than 520 hours if an employee works more or less than 2,080 hours per year, and because some of the occurrences may have received the necessary approval from the Director of Human Resources, the occurrences since FY 2010-11 also do not necessarily represent violations of the City Administrative Code.

Conclusion

The San Francisco Police Department’s policies and controls do not sufficiently manage overtime use by sworn staff, which increased by 57 percent between FY 2010-11 and FY 2016-17.

Between FY 2012-13 and FY 2016-17, the General Fund overtime budget for the Police Department increased from \$12.4 million to \$14.6 million; actual overtime increased from \$14 million to \$20.6 million and was funded through re-appropriation of surplus salaries.

Exhibit 4.13: General Fund Overtime Budget and Actual Spending

	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17
Budget	12,397,883	12,638,891	12,638,891	13,638,891	14,638,217
Actual	14,028,678	13,335,647	14,174,399	19,504,900	20,644,548
Overspending	1,630,795	696,756	1,535,508	5,866,009	6,006,331
% Budget Increase		1.9%	31.1%	7.9%	7.3%
% Overspent	13.2%	5.5%	12.1%	43.0%	41.0%

Source: San Francisco Police Department

The cost of excessive overtime has a General Fund impact, either through increasing overall General Fund costs or reducing the availability of General Fund monies to pay for permanent positions.

Use of overtime, especially an increase in average overtime use for all sworn staff, could impact Department performance. Little formal research exists on the impact of Police performance due to high overtime, although one study by the Police Foundation reported a decrease in alertness for Police officers working long shifts.⁹

Recommendations

The Chief of Police should:

Recommendation 4.1: Develop and implement overtime policies, including (1) written guidelines for Police district captains, lieutenants, and sergeants on approving shift extension overtime, including specific criteria for when approval of shift extension overtime is appropriate; (2) incorporation of compliance with overtime approval guidelines (including enforcement of existing policies on pre-approval and sign-off of overtime on timecards) into captain, lieutenant, and sergeant annual performance evaluations; and (3) required training for captains, lieutenants, and sergeants on implementation of overtime policies and procedures.

Recommendation 4.2: Increase oversight of overtime Department-wide and by Police district and revise biweekly reporting requirements to better identify and correct unusual, unexplained, or disproportionate use of overtime (including high users); and identify and reduce occurrences of overtime that exceed Department and City overtime limits.

Recommendation 4.3: Incorporate analysis of cost-effectiveness of overtime and alternatives to overtime use to accomplish tasks or program objectives into the annual budget.

⁹ *The Impact of Shift Length in Policing on Performance, Health, Quality of Life, Sleep, Fatigue, and Extra-Duty Employment*, K Amendola, D Weisburd, E Hamilton, G Jones, M Slipka, for the Police Foundation, funded by the National Institute of Justice, US Department of Justice, March 2011.

5 Civilianization

As the rate of property crime in the City increases and the public demands the presence of more Police officers on the street, the San Francisco Police Department must maximize the use of sworn employees in providing critical public safety services. Since at least 1998, audits and studies of SFPD staffing have resulted in recommendations to civilianize administrative positions currently filled by sworn staff—a best practice recognized by major law enforcement associations, including the International Association of Chiefs of Police, and adopted by most major law enforcement departments in the country. Yet, San Francisco’s ratio of sworn to civilian staff remains higher than both its peers and the national average. Because the City makes a significant investment in training Police officers with skills to keep the public safe, assigning those highly trained (and highly compensated) officers to administrative functions is an inefficient use of resources. Police officers are among the highest paid employees in the City. Using civilian employees rather than sworn officers to staff administrative positions within the Department would cost less per position. While there is a need for sworn officers in certain administrative and non-patrol positions, particularly in supervisory roles, there are opportunities to civilianize many positions, which would produce cost and operational efficiencies for the Department. As it seeks to increase the number of Police officers serving the City, the Department should adopt a civilianization plan as a key component of that effort to maximize the number of full-duty officers providing direct public safety services.

Civilianization is a Best Practice and Recognized by the City in the Charter

Since the 1990s, law enforcement agencies across the country have adopted civilianization as a best practice. It has been widely recognized as a cost-effective way to focus the skills of sworn officers on providing direct public safety.

Civilianization refers to the practice of hiring civilian personnel, at a lower cost, to fill positions in law enforcement agencies that do not require the unique skills and experience of sworn officers, in order to maximize the number of sworn officers deployed for critical public safety duties, including patrol activity. While civilianization has become a widespread practice in Police departments throughout the country, there is no generally accepted guideline regarding the mix of sworn to civilian positions for maximizing operational effectiveness. Law enforcement agencies and the jurisdictions they serve face unique considerations of budget constraints, operational needs and community priorities. In addition, the services provided by departments can

vary; for example, some may include 9-1-1 call centers, parking enforcement, or transit Police.

In order to determine whether a position can be civilianized, law enforcement agencies commonly consider the following questions:

- Does the position require law enforcement powers (i.e. powers of arrest, use of force, statutory requirement, apprehending/detaining/ questioning persons, or carrying a firearm)?
- Are the skills, training, experience, or credibility of a sworn Police officer required to fulfill the duties of the position?

For example, does the position require the employee to: analyze physical evidence; take statements and conduct interviews; conduct surveillance; contact informants; be in situations that may become enforcement situations?

- Can the requirements of the position be fulfilled by a specially-trained civilian?

The City of San Francisco has formally adopted civilianization as a practice. Following the passage Proposition D by voters in 1994, the San Francisco Charter was amended (Section 16.123) to require the Controller and the Chief of Police to identify positions that could be filled by civilians, and to conduct this review in consultation with our office.

Separately, the Charter mandates that the Police Commission initiate an annual review to “to civilianize as many positions as possible to maximize Police presence in the communities and submit that report to the Board of Supervisors annually for review and approval.”

The Police Department’s Recent Civilianization Efforts

Since at least 1998, audits and studies of Police staffing have cited opportunities for civilianizing positions in the Department. Prior civilianization recommendations include:

- In 1998, the Budget Analyst’s Office recommended 157 civilian positions as part of a two-phase management audit of the Department. (SFPD agreed with 130 of the 157 positions identified for civilianization)
- In 2008, the Controller’s office hired the Police Executive Research Firm (PERF) to conduct a comprehensive analysis of the Department’s staffing. PERF recommended 161.5 new civilian positions.
- In 2010, the Controller’s office submitted a memo to the Mayor recommending 251 civilian positions.

- In 2012, the Controller’s office submitted a memo to the Mayor identifying 65 positions for civilianization.

In FY 2012-13 and FY 2013-14, the Department civilianized a total of 51 positions (primarily in IT and Compstat) that had been identified either in the PERF report or in the 2010 Controller’s memo. The Department also completed the civilianization of the finance department (which began years earlier) in 2013, and in FY 2016-17, the Department added a Fleet Manager¹. However, in total these positions still reflect a fraction of the recommendations from previous staffing audits.

The Department notes that additional civilianization requests were submitted to the Mayor in FY 2014-15 and FY 2017-18 (for Facilities, Records, Property positions), but these requests, as shown below, were not approved.

Exhibit 5.1: Unfunded Requests for Civilian Positions

Fiscal Year	Classification	Number
2013-14	9209 - Property Officer	6
2014-15	1406 - Record Clerks	4
2015-16	Facilities Manager	1
	7313 - Machinist	1
2016-17	Facilities Manager	1
	7313 - Machinist	1
	9209 - Traffic Desk Clerks	2
2017-18	Facilities Manager	1
Total Unfunded Civilian Positions		17

Source: San Francisco Police Department

Instead, the Mayor has added civilian positions in recent fiscal years to support new initiatives, including the Body Worn Camera Program. While these positions increased the number of civilian staff, they did not increase the number of sworn officers in the field.

Since FY 2012-13, the number of budgeted sworn and civilian employees, excluding Airport employees,² has increased by 11.7 percent—from 2,350 in FY 2012-13 to 2,626 in FY 2016-17. As shown in Exhibit 5.2 below, the number of budgeted sworn officers increased from 2,040 to 2,241 during that time, and the number of civilian employees increased from 310 to 385.

¹ As of April 2018, this position was in the process of being filled. A sworn officer continues to fill this role, but will be reassigned to field when the civilian starts.

² The San Francisco Police Department (SFPD) provides Police services to the Airport, which are funded in the Airport’s budget. In addition to providing basic Police services to the Airport, the SFPD Airport Bureau enforces the Airport’s Transportation Security Administration’s security plan, and supports individual security plans of the airlines.

Exhibit 5.2: Total Budgeted Sworn and Civilian Full Time Employees, FY 2012-13 to FY 2016-17

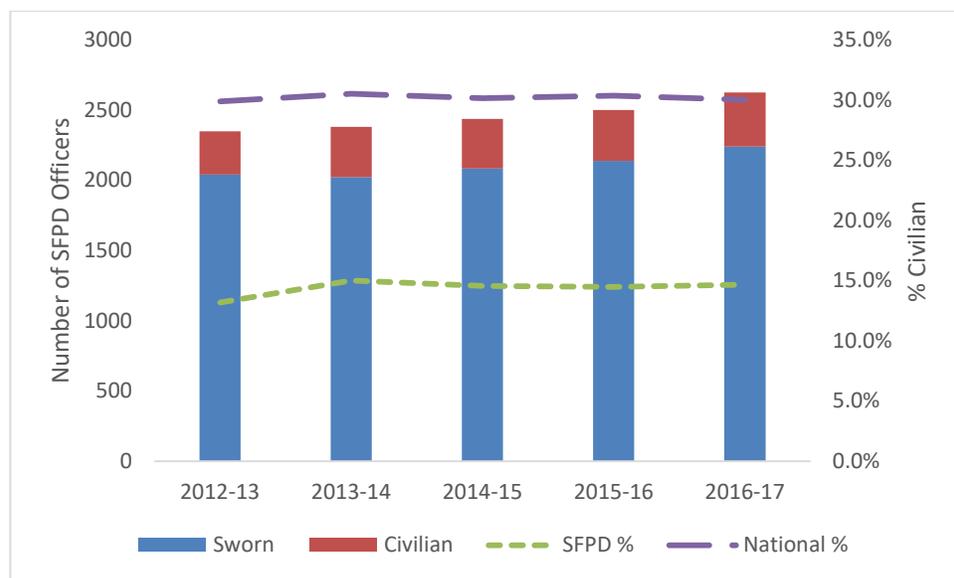
	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	% change
Sworn	2,040	2,023	2,083	2,138	2,241	9.9%
Civilian	310	357	355	362	385	24.2%
Total	2,350	2,380	2,438	2,500	2,626	11.7%

Source: SFPD Reports to the Budget & Finance Committee on Budget Priorities, 2013-2017.

SFPD Ranks Below Peers and National Average on Civilianization

Although the number of civilian employees increased by nearly 25 percent since FY 2012-13, the number of civilian employees as a percentage of the department’s workforce has been relatively constant, ranging between 15 percent and 18 percent of the total workforce, which is below the national average of approximately 30 percent, as shown in Exhibit 5.3 below.

Exhibit 5.3: Sworn and Civilian Employees, FY 2012-13 to FY 2016-17



Sources: Police Department Reports to the Budget and Finance Committee on Budget Priorities, 2013-2017, and UCR data

For consistency, we used the same peer cities identified by the Controller’s Office in the 2018 Police staffing benchmarking section of the Performance Scorecards.

As shown in Exhibit 5.4 below, as of 2016 (the latest data available for peer agencies), SFPD’s civilian staff equaled 14.7 percent of the total workforce, compared to the 18.7 percent average of the peer cities and the 30 percent national average.

Exhibit 5.4: Comparison of Sworn to Civilian Staffing at Selected Peer Agencies

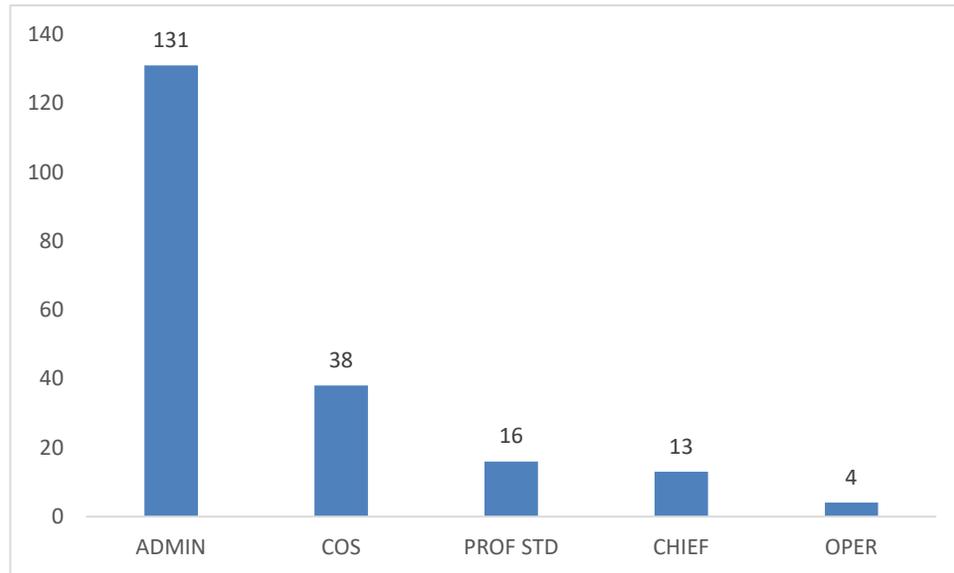
Police Department	Sworn	% Sworn	Civilian	% Civilian	Total Force
Sacramento	652	68.3%	302	31.7%	954
Long Beach	806	68.7%	367	31.3%	1,173
Seattle	1,384	71.1%	562	28.9%	1,946
Oakland	750	71.7%	296	28.3%	1,046
San Diego	1,815	72.0%	707	28.0%	2,522
San Jose	1,352	76.6%	413	23.4%	1,765
Miami	1,201	77.0%	358	23.0%	1,559
Los Angeles	9,850	77.6%	2,842	22.4%	12,692
Philadelphia	6,313	79.0%	1,682	21.0%	7,995
Portland	908	79.0%	242	21.0%	1,150
Boston	2,125	79.4%	553	20.6%	2,678
Denver	1,483	82.4%	316	17.6%	1,799
Minneapolis	847	83.2%	171	16.8%	1,018
San Francisco	2,241	85.3%	385	14.7%	2,626
Washington, DC	3,753	86.2%	599	13.8%	4,352
Baltimore	2,512	86.4%	396	13.6%	2,908
Chicago	11,954	91.0%	1,181	9.0%	13,135
Average of Peer Cities	2,982	81.3%	687	18.7%	3,668
National Average	652,936	70.0%	280,206	30.0%	933,142

Source: UCR data

Officers Not Working in Patrol Assignments

According to SFPD staffing data and as shown in Exhibit 5.5 below, as of January 2018, 202 sworn officers were assigned to non-patrol/special operations functions at the Department in five divisions/bureaus: Administration, Chief of Staff's Office, Professional Standards, the Chief's Office and Operations.

Exhibit 5.5: Sworn Employees in Non-Patrol Positions, by Division/Bureau, as of January 2018



Source: SFPD data

Note: COS refers to the Chief of Staff. "Prof Std" refers to Professional Standards and Principled Policing Bureau." "OPER" refers to the Field Operations Bureau.

As shown in the exhibit above, the majority of these officers work in the Administration bureau. This includes 28 sworn employees who were on temporary modified duty. Because the data provided by the Department does not identify the modified duty assignments, we cannot exclude them from the analysis.

While we did not include the Investigations Bureau in this analysis, recognizing that much of the work performed requires law enforcement training, we note that the 2008 PERF report identified tasks performed by sworn officers in Investigations that could more effectively and efficiently be performed by civilians. PERF recommended the addition of 23 civilian employees to allow sworn officers in Investigations to focus on tasks requiring their expertise. The Department did not implement this recommendation to hire 23 civilians in the Investigations Bureau. We strongly recommend that any future civilianization study include this bureau in the analysis.

Exhibit 5.6 below shows that 119 of the 202 sworn officers in non-patrol/special operations assignments are Police Officers, the lowest rank of sworn employees in the Department. Notably, all of these officers (except for those on temporary modified duty) count towards the Department's 1,971 full-duty staffing goal, despite the fact that some are not providing direct public safety services in the field.

Exhibit 5.6: Sworn Employees in Non-Patrol/Special Assignments by Rank

Rank	# of Sworn
Police Officers	119
Sergeant	55
Lieutenant	13
Inspector	6
Captain	2
Commander	2
Deputy Chief	2
Crime Scene Investigation Manager 3	1
Chief of Police	1
Assistant Chief of Police	1
Total Sworn Officers in Non-Patrol/Special Ops	202

Source: SFPD data

Many of these Police Officers have been assigned to tasks that were previously identified for civilianization,³ notably in the Fleet, Facilities, Records and Property units.

We recognize the importance of sworn supervision across many of the Department's functions, including those in the Administration Bureau, in order to provide essential subject matter expertise and leadership. We also recognize the need for sworn officers in certain non-supervisory roles in these non-patrol functions, and do not contend that all non-patrol positions should be civilianized. However, to ensure that it provides the most cost-effective public safety services, the Department should re-evaluate the assignment of lower-ranking officers to non-patrol duties.

While a full civilianization study should be part of a longer-term organizational strategy, the Department could select certain positions in the Administration Bureau immediately for civilianization—particularly as it balances urgent needs for additional⁴ sworn service in investigations and patrol. The Administration Bureau has five divisions: Forensic Services, Staff Services, Crime Information Services, Police Academy/Training, and Administration. With the exception of the Police Academy/Training division, all other divisions offer opportunities for civilianization, which have been noted in prior audits and in the Department's own requests during the annual budget process.

If SFPD were to civilianize the positions held by 30 Police Officers currently assigned to Forensic Services, Staff Services, Crime Information Services,

³ In 2008, the Controller's Office hired the Police Executive Research Firm (PERF) to conduct a staffing analysis of the Police Department. This report includes dozens of recommendations for civilianization, as did 2010 and 2012 reports from the Controller's Office.

⁴ As per the Department's presentation to the Budget and Finance Committee on April 26, 2018.

Police Academy/Training, and Administration, and redeployed those officers to patrol functions, the estimated annual savings to the City for performing those administrative duties would be over \$2.2 million. The table below details these estimated costs, using the highest step for both classifications and assuming that the replacement civilian classification would be a 1406 Senior Clerk.

Exhibit 5.7: Estimated Avoided Costs for Replacing 30 Officers Assigned to the Administration Bureau with Civilians

Classification	Annual Salary	Annual Benefits	Total Annual Compensation
Police Officer (Q4)	\$124,935	\$40,972	\$165,908
Senior Clerk (1406)	\$61,246	\$30,713	\$91,959
Estimated Annual Cost Savings Per 1 Civilianized Employee			\$73,949
Estimated Annual Cost Savings Per 30 Civilianized Employees			\$2,218,474

Source: BLA analysis

In addition to the annual avoided costs shown above, there would be additional savings for at least the following:

- Recruitment
- Academy
 - Materials and Supplies
 - Pre-employment Costs
 - Overtime for Trainers
- Sworn Pension Benefits

Civilian candidates for administrative positions may offer greater technical skills and capacity than their sworn counterparts. With this opportunity to provide better performance within administrative functions, and by freeing up more officers to do those jobs that require law enforcement training, the Department could ensure a higher level of operational efficiency.

We defer to the Department to identify the most appropriate positions for immediate civilianization, but suggest that at least 30 could be selected from the following divisions/units in the Administration Bureau:

Exhibit 5.8: Suggested Positions for Civilianization

Division/Unit	# of Officers
Administration	2
Crime Scene Investigations	6
Property	10
Professional Standards	5
Staff Services	11
Total Officers Available for Redeployment	34

We note that because the Department cannot provide detail regarding employees who on temporary or permanent modified duty or who have been reassigned for disciplinary reasons, we cannot specifically identify them, and so they cannot be eliminated from our analysis. We understand that some of those officers may be reflected in the numbers above.

Officers on Temporary Modified Duty

In accordance with the Department's General Order 11.12, sworn personnel who are on limited-duty status may continue to fill some positions/functions throughout the Department, per the Department's "temporary modified duty and reasonable accommodation" policy.

The Deputy Chief of Administration is responsible for finding appropriate assignments for sworn officers who have been placed on temporary modified duty, following a review by the Department's medical liaison of the restrictions placed on the officer per physician orders. In order to make these accommodations, which are common in public safety, the Department must have appropriate and sufficient placement opportunities available.

In 2001, the Department adopted a policy not to accommodate officers needing modified duty assignments in a permanent capacity. Limited duty assignments are now limited to 365 days, with review by the Staff Services unit every 30 days. The officers on permanent modified duty at the time that the Department adopted this new policy were allowed to maintain those assignments. As of March 2018, there were 13 of those officers still at SFPD, and they are assigned accordingly: Investigations (5), Forensic Services Division (1), Technology (1), Staff Services (1), Chief of Staff/Legal (1), CIS (2), and Special Operations (2).

As of March 2018, the number of officers on temporary modified duty was 41, which Department officials note to be consistent with the average. Those assignments include: Field Operations (10) Special Operations (3), Department Operations Center (6), Forensic Services (3), Chief of Staff/Legal (5), Crime Information Services (4), Training Division (2), Staff

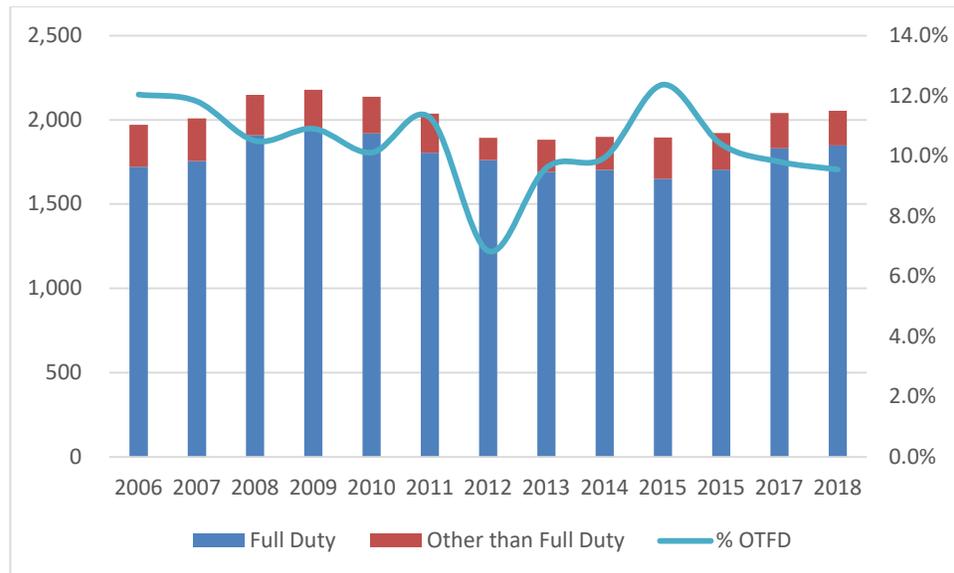
Services (1), Investigations (2), Technology (1), Community Engagement (1), and Professional Standards (3).

With only 54 sworn officers assigned to non-Patrol functions for permanent or temporary modified duty, and a total of 202 sworn officers currently assigned to non-Patrol assignments in the Department, modified duty assignment needs do not present a significant factor in the Department’s relatively low rate of civilianization.

Full Duty Officers Assigned to Administrative Tasks

As of January 2018, the Department has 2,147 sworn officers on payroll.⁵ However, only 1,848 qualify as full duty. Over 200 officers are considered “other than full duty”, indicating that they are either on leave (i.e. military, family, disability) or on temporary modified duty.

Exhibit 5.9: Full Duty and Other than Full Duty Officers, 2006 to present



Source: SFPD report

As shown in the exhibit above, the percentage of Other than Full Duty officers has been declining since a peak in 2015, although, at 9.5 percent in January 2018, it is still a significant portion of the Department’s workforce.

In addition, as previously noted, 202 (or over 10 percent) of the 1,848 full duty officers are assigned to non-patrol, administrative functions. This means that only 1,646 officers provide direct public safety services in the field.

⁵ Note that the 2,241 sworn officers shown in Table 3 reflect the Department’s workforce in 2016, the most recent year for comparative data available from the Department of Justice.

Exhibit 5.10: Summary of Sworn Staffing, as of January 2018

Total Sworn on Payroll	2,147
Charter Staffing Mandate	1,971
Current "Full Duty" Sworn	1,848
Sworn in Administrative Roles	202
Total Full Duty Sworn in field	1,646

According to the Chief of Police, the Department expects to reach the Charter-mandated full-duty sworn staffing level of 1,971 officers by December 2018. However, in the absence of civilianization, that number will not reflect the number of officers actually serving in the field.

Conclusion

Previous recommendations to civilianize positions at SFPD currently filled by sworn officers have not been implemented. In its efforts to restore sworn officer strength to the Charter-mandated 1,971 officers, the Department has prioritized expanding the sworn workforce, and adding civilian positions to support new initiatives. As a result, over 200 sworn officers continue to fill administrative functions.

Assigning these sworn officers to duties that could be fulfilled by civilians presents a cost to the City both in terms of increased wages and benefits, as well as reduced public safety, with fewer officers on the streets. It is an inefficient and ineffective use of these highly trained employees. With the noted exception of sworn leadership roles, many of the officers assigned to non-patrol duties are performing tasks that do not effectively utilize their skills, training and experience.

In the long term, civilianizing non-Police functions and positions is a cost-effective strategy to move full-duty officers back out into the field. In addition, placing civilians in administrative roles creates greater stability and allows for the development of historical knowledge in those functions.

To further enhance the number of Police officers on the street, the Department could shift the number of Police officers performing administrative tasks to Police duties, replacing these Police officers with civilian staff.

Recommendations:

The Board of Supervisors should request:

Recommendation 5.1: The Controller to conduct civilianization reviews, in conjunction with the Police Chief, the Department of Human Resources and our office, as required by the City Charter.

The Police Chief should:

Recommendation 5.2: Work with the Mayor's Office to expedite the immediate civilianization of at least 30 positions in the Administration Bureau currently filled by officers, in order to redeploy those officers in to the field.

Conclusion, Costs, and Benefits

The Police Department's current deployment and scheduling practices need to be improved. The allocation of police officers to the City's ten police districts does not fully reflect actual district workload and results in wide disparities in the utilization of sworn staff across the ten Police districts. In addition, the Department lacks a performance target for the percentage of time that patrol officers should spend responding to calls for service.

The Police Department should also modify its patrol schedule for officers and sergeants. Currently, the Department assigns officers and sergeants to one of seven "watch-off" groups, which cover a specific ten hour shift over a 49 day rotation. This shift schedule results in wide discrepancies in the number of officers that are available for a shift on any given day within a Police district. It also enforces a low and highly variable span of control of sergeants supervising officers. Although changes to the existing patrol schedules would likely require a meet and confer process with the Police Officers Association, they would allow for the more efficient deployment of patrol staff.

The Police Department's policies and controls do not sufficiently manage overtime use by sworn staff, which increased by 57 percent between FY 2010-11 and FY 2016-17. Over the same period, the number of arrests made by the Department for violent crimes and property crimes decreased by 14 percent and 31 percent, respectively, suggesting that the increase in overtime is unrelated to workload. The cost of excessive overtime has a General Fund impact, either through increasing overall General Fund costs or reducing the availability of General Fund monies to pay for permanent positions.

Finally, our audit identified at least 202 positions filled by sworn staff that could be filled by civilians. In the long term, civilianizing non-police functions and positions is a cost-effective strategy to move full-duty officers back out into the field. In addition, placing civilians in administrative roles creates greater stability and allows for the development of historical knowledge in those functions.

Implementation of our recommendations would require Police Department resources to develop performance targets for patrol; revise patrol and sergeant work schedules and staff allocations, and meet and confer with the Police Officers Association on these revised schedules and allocations; develop and implement enhanced internal controls over overtime; and evaluate existing sworn positions that could be civilianized. The Police Department and Controller's Office could potentially incur new, short-term costs to implement these recommendations. Improving controls over overtime would reduce the cost of overtime. Improved staffing allocations and civilianization of sworn positions would enhance police staffing and avoid the costs of new sworn positions, although some new costs could occur for new civilian positions. The City would realize significant benefits in better utilizing sworn staff.

Appendix A Cover

Staff Analysis Methodology

The objective of this section of the audit was to determine the method used by the SFPD to make staffing assignments. In particular, we wanted to determine whether Field Operation Bureau was making adjustments in the distribution of staffing allocations across the ten districts at the beginning of the six-month sign-up periods. We were also interested in evaluating the degree to which district captains proposed staffing assignments to the sector and non-sector patrol units showed evidence of attempts to adjust staffing allocations to accommodate workload demands.

To evaluate the efficacy of the Department's current staffing practice, and the degree to which staffing allocations reflect actual district-level workload variance, we calculated the time that officers are responding to call for service by reviewing dispatch data from the Department of Emergency Management (DEM). The estimates were then compared to the district-level patrol staffing allocations that coincide with the six month sign-up periods. All numbers pertaining to staffing allocations are taken from the staffing memorandums that represent the number of officers assigned to the districts by Field Operations Bureau, and that are expected to go into effect in the first full pay period after the first Monday of the March and September signup periods. Due to reassignments during the six-month sign up period, the actual numbers of officers assigned to the police districts may vary from the number reported on the staffing memos.

We have developed two measures of the ratio of time spent responding to calls for service relative to the number of officers assigned by Field Operations to the ten districts. The first is based on the total allocated staff time for all officers assigned to patrol. The second is this ratio estimated for car sector only.

Our core workload measure is the amount of time patrol officers are responding to calls for service (CFS) on average over the course of their active patrol time during the six-month sign up period. To estimate this measure, we used DEM data to determine the time each patrol unit that was dispatched on a call and hence was not available to engage in self-initiated patrol. The time during which the officer or unit was disposed responding to a CFS is the difference between the earlier of OFFICER_DISPATCHED_DATETIME, OFFICER_ENROUTE_DATETIME, or OFFICER_ONSCENE_DATETIME, and the later of OFFICER_CLEARED_DATETIME, OFFICER_PREEMPTED_DATETIME.

To calculate the time officers are disposed responding to calls for all patrol we induced the following units:

1-19 sectors

27-29 School resource officers

30-32 Patrol Wagon

40-59 foot beat/bike

66-67 Park patrol

70-75 Housing/homelessness

The numbers for Patrol Wagon and Park Patrol were very small, and had negligible impact on the results.

To calculate sector only, we selected only the primary unit codes with the values 1-19 in third and fourth digits of the unit ID.

We excluded all primary unit codes that have only two number entries (3A, 3B). In addition, we excluded the following types of calls under Call Type: 585, 587, 588, 903, 421, 423, 407, 409, and 903, and all self-initiated calls in (coded as "On View").

We used minutes as our unit of time for all estimates of average time spent responding to calls. To construct our estimates of total hours available for patrol service based on the initial district level staffing allocations, and for car sector only, the proposed staffing assignments made by the district captains, we used the following formula:

Total minutes of active service = (Number of Officers)(4/7)*(show up rate)*(minutes in shift)*(days in signup period)*

The show up used was 81%, as calculated by the Controller's Office in their 2018 report on SFPD staffing. The number of officers is the number assigned to the districts. The estimate of the average amount of total patrol time spent responding to calls for service is the ratio:

Average percent of patrol responding to CFS = (CFS Time/Available Patrol Time)

for the relevant time periods, district, and patrol units.

Appendix B Cover

Rules and regulations governing San Francisco Police Department overtime usage

Overtime eligibility

State law requires overtime pay at 150 percent of regular pay to eligible employees after 8 hours in the day or 40 hours in the week.

Section 11.01 of the San Francisco Police Department's General Orders defines overtime as any work performed in excess of the normally scheduled watch or work week. Eligible sworn staff are compensated for overtime at the rate of time and one-half for either time off or pay. Department Bulletin 17-112, "Overtime Rules and Reporting," states that in order to be eligible to receive overtime compensation, members must work in excess of their regularly scheduled 8, 9, or 10 hour work day or 35, 40, or 45 hour work week during that period.¹

Article III Section 2.A of the Memorandum of Understanding between San Francisco and the San Francisco Police Officers' Association, Units P-1 and P-2A, states that any overtime worked by an employee who holds a permanent rank below the rank of captain is eligible for overtime compensation or compensatory time off. Captains and higher-level command staff, including commanders, deputy chiefs, and chiefs, are not eligible for overtime compensation or compensatory time off and instead receive a percentage-based wage increase specified in the governing Memorandum of Understanding for that employee's position.

Exhibit B.1 below displays the total number of sworn staff eligible to earn overtime by fiscal year.

Exhibit B.1 Total sworn staff eligible for overtime, excluding the Airport

	Total sworn staff eligible for overtime
FY 2008-09	2,303
FY 2009-10	2,346
FY 2010-11	2,277
FY 2011-12	2,183
FY 2012-13	2,091
FY 2013-14	2,140
FY 2014-15	2,073
FY 2015-16	2,099
FY 2016-17	2,274

Source: BLA analysis of SFPD Human Resource Management System (HRMS) data

Note: Totals do not represent total active full-duty officers, and were calculated as a count of unique identification numbers that appeared in the timekeeping system each year in ranks eligible for overtime, not by FTEs or positions.

¹ An 8, 9, or 10 hour work day and a 35, 40, or 45 hour work week include the use of vacation time and legal holidays when calculating voluntary overtime. However, if staff use any other form of discretionary time off or sick pay, that time off does not count toward an 8, 9, or 10 hour work day or a 35, 40, or 45 hour work week, and therefore they are not eligible for overtime compensation for voluntary overtime and will instead be compensated at straight pay for those hours worked.

Department and City overtime limits

City Administrative Code Section 18.13-1 states that without prior approval, employees shall not be permitted to work more than 520 hours of overtime in a fiscal year for a full-time 2,080-hour per year employee, or 25 percent of the number of hours the employee is regularly scheduled to work on a straight-time basis.

Department Bulletin 17-112 states that without advance written approval of their captain or division director, members shall not work more than:

- 14 hours total in any 24-hour period, including all on-duty hours, overtime assignments, and secondary employment;
- 20 hours of overtime in one week,² either voluntary or mandatory and for either time or pay;
- 40 hours of overtime in a single pay period, either voluntary or mandatory and for either time or pay.

Department control and documentation of overtime usage

Department Bulletin 17-045, "Monitoring Overtime," states that it is Departmental policy that all overtime be:

- Pre-approved by a supervisor or a manger;
- Verified by a supervisor or manager;
- Approved by the Commanding Officer or Division Director; and
- Entered into the Human Resources Management System (HRMS), the Department's electronic timekeeping and payroll system, and submitted to the Payroll Unit within the pay period.

This series of approvals functions as the Department's internal control system to ensure that only appropriate and legitimate uses of overtime are approved and paid.

The primary documentation of overtime use and approval is a paper timecard, SFPD Form 289, that staff use to record overtime details and supervisor approval. The form contain fields for employee name, assignment, watch worked, beginning and ending day and date of overtime, total overtime worked, nature of the work, overtime category, and employee signature. (Compensation for court-related overtime is recorded on a different form and is discussed separately.) The timecard also contains a field for the name of the individual who certified the overtime hours and fields for the approval of the commanding officer and the date of his or her approval.

Overtime data on the paper timecards is manually entered into HRMS, the Department's electronic timekeeping and payroll system. The station timekeepers at district stations (officers, sergeants, lieutenants, or civilian clerks) are typically

² Department Bulletin 17-112 states that the work week for the purpose of calculating overtime is from Saturday at 12:01am (00:01 hours) to Friday at 12:59pm (23:59 hours).

the individuals who enter the data into HRMS. Timekeepers then send the paper timecards and the electronic overtime reports to either the Field Operations Bureau or the Payroll Unit; Field Operations Bureau receives station overtime cards, and Payroll receives Administration, Investigations, and Special Operations Bureau overtime cards. According to the Department, the paper overtime cards as the original records of overtime usage and approval are retained by the Payroll Unit or the Field Operations Bureau for at least seven years.

Court-related compensation

Staff who are required to appear in court outside their regular shift schedule are eligible to receive court premium pay, or court-related overtime. Prior to FY 2014-15, court-related pay was budgeted as premium pay rather than overtime in the Department's budget. Beginning in FY 2014-15, court-related pay has been budgeted as overtime pay.

Similar to general overtime, each instance of court-related overtime is first recorded by Department employees on a paper court timecard, SFPD Form 175. The timecards contain fields for employee name, assignment, watch worked, beginning and ending day and date of court time, total court time worked, the type of court appearance and relevant case information, and employee signature. The timecard also contains a field for the signature of the District Attorney or defense attorney who requested that the individual appear in court, the name of the individual in the Court Liaison Unit who certified the hours, and fields for the approval of the commanding officer and the date of his or her approval.

Court time is governed by Section 3.08 of the Department's General Orders and by Department Bulletin 18-035 "Court Appearances and Court Compensation Pay." The Department Bulletin outlines the required signatures, dates, and times on the paper court timecard.

Department overtime budget and allocations

Prior to FY 2017-18, the Department allocated and tracked overtime hours allotted and used by bureau, but not by district station. In FY 2017-18 the Department developed a more detailed overtime distribution and allocated hours by district station and by overtime category.

Best practices in overtime control: recommendations from the International Association of Chiefs of Police and the National Institute of Justice

The International Association of Chiefs of Police (IACP)'s National Law Enforcement Policy Center developed a model policy related to overtime management and control intended to assist law enforcement leadership develop an effective structure for monitoring, managing, and controlling the use of personnel overtime.^{3,4} The IACP's model includes the following policies:

³ International Association of Chiefs of Police, National Law Enforcement Policy Center, "Overtime Model Policy," effective August 1999.

⁴ International Association of Chiefs of Police, National Law Enforcement Policy Center, "Overtime Concepts and Issues Paper," May 1, 2000.

- All overtime worked shall be approved for payment by the designated supervisor.
- Individual and summary overtime data shall be compiled and provided to agency supervisors and command personnel on at least a monthly basis. Commanders and supervisors shall monitor reports to identify unusual, unexplained, or disproportionate overtime expenditures.
- No task or function shall be performed on overtime that could otherwise be performed during regular work hours.
- Only overtime required to meet vital service demands shall be authorized.
- Tasks and functions that require the use of overtime shall be routinely evaluated for cost-effectiveness.
- All overtime must receive advance authorization unless unreasonable due to emergency circumstances.
- Supervisors and command staff shall take measures to reduce or limit overtime demand, including:
 - Assign non-emergency service requests received near shift changes to on-coming personnel
 - Ensure that individuals who make arrests late in their shift receive available assistance to process prisoners as quickly as possible.

A report on national police overtime sponsored by the National Institute of Justice⁵ (NIJ) also provides overtime best practices and recommendations, including the following:

- Police departments should analyze patterns of overtime expenditure by individuals, by units, and by the nature of the worked performed, and identify unusual payouts to individuals or units.
- Managers should assist the immediate supervisors who approve shift extension overtime by providing them with updated and revised guidelines for approval and by reviewing their performance regularly.

The importance of leadership and continuous monitoring

It is ultimately the responsibility of Department leadership to emphasize the importance of responsible overtime management and to hold employees accountable for their overtime usage. Both the IACP and the NIJ emphasize the important role that high-level leadership plays in controlling overtime. The NIJ brief notes:

“Responsible overtime management requires leadership from the top. If the chief is indifferent about overtime, the support systems—both human and technical—necessary to manage overtime will be neglected. A chief’s indifference will also leave middle managers

⁵ National Institute of Justice, Research in Brief, “Police Overtime: An Examination of Key Issues,” May 1998.

exposed—reluctant to go where the chief prefers not to tread, but at risk if overtime problems occur.”

The “tone at the top” regarding overtime determines how able captains and first-line supervisors are to manage the overtime usage of their units and direct reports.

The Government Accountability Office’s Green Book (Standards for Internal Control in the Federal Government, GAO-14-704G) recommends that management identify, analyze, and respond to risks by designing internal controls and monitoring their effectiveness (7.01), evaluate whether internal controls exist and have been properly designed to address identified risks (OV3.05), and evaluate whether internal controls were consistently applied during a given period (OV3.06). In monitoring internal control systems, management should establish the current state of the organization’s internal control environment and outcomes as a baseline to measure future performance (16.02) and undertake periodic evaluations, such as assessing internal control design and testing internal controls (16.06-07). Outcomes of ongoing and period evaluations should be measured against the established baseline, and corrective actions should be taken, as necessary (16.09).

Some overtime is unavoidable

Some level of overtime is necessary and unavoidable in police departments, regardless of staffing levels, and in some cases the use of overtime is the most cost-effective way to address policing needs.⁶ The points and recommendations made in this report regarding the Department’s overtime usage and policies are not presented to suggest that the Department is able to or should eliminate all overtime. Our recommendations are made to improve the Department’s control over overtime usage, to eliminate unnecessary overtime use, and to identify and prevent overtime abuse.

Types of Police Department Overtime

The Department tracks overtime hours by type of overtime using the following categories:

- **10B overtime** refers to Chapter 10B of the City’s Administrative Code, which states that any person, corporation, firm, or organization that is hosting a cultural, recreational, entertainment, or other event may request law enforcement services from the Department, subject to approval from the Chief of Police. The requesting organization or entity pays for the Police Department services requested under Chapter 10B, including overtime worked by sworn staff. Because 10B overtime is paid by the third-party event host and not the City, 10B overtime is excluded from this analysis, except for when Chapter 10B counts toward established overtime limits.

⁶ National Institute of Justice, Research in Brief, “Police Overtime: An Examination of Key Issues,” May 1998.

- **Arrest overtime** is related to an arrest and typically occurs as a shift extension, when sworn staff must work additional hours after the end of a shift due to an arrest.
- **Investigation overtime** is related to an investigation, and typically occurs as a shift extension when sworn staff must work additional hours after the end of a shift due to an investigation.
- **Events overtime** is related to a special event, grant, special fund, or work order.
- **Court-related overtime** is incurred when sworn staff are required to appear in court outside their regular shift schedule.
- **Training overtime** is paid to sworn staff who teach Police Academy classes on top of their regularly-scheduled work week.
- **Miscellaneous overtime** does not fall into one of the categories above, and must be authorized by a Commander or Deputy Chief.

Methodology to Evaluate Trends in Police Department Overtime

To identify trends in overtime usage by sworn staff at the Department, we analyzed historical HRMS timekeeping records provided by the Department for ten fiscal years, FY 2007-08 through FY 2016-17. The records provided by the Department include the shift start and end date/times for each sworn staff on each day, with fields indicating job class, the division where the work was performed (e.g., "CENT" for Central Station), and the time reporting code for the type of work performed.

The table below provides a breakdown of the time reporting codes by time category used in our analysis.

Time Reporting Code	Description	BLA Category Description
10B	Police Law Enforcement Services	10B
LWOE3	Like Work Arrest OT Comp Time at 1.5	Arrest/Investigation
LWOT2	Like Work Investigation OT Pay at 1.5	
LWOT3	Like Work Arrest OT Pay at 1.5	
OE2	Investigation OT Comp Time at 1.5	
OE3	Arrest OT Comp Time at 1.5	
OT2	Investigation OT at 1.5	
OT3	Arrest OT at 1.5	
CRP	Court OT/Pay Requested	Court
CRPS	Court OT/Pay - Superior Court	
CRPT	Court OT/Pay - Traffic Court	
CRT	Court OT/Comp Time Requested	
CRTS	Court OT/Comp Time - Superior Court	
CRTT	Court OT/Comp Time - Traffic Court	
03K	Field Training Officer	FTO

Time Reporting Code	Description	BLA Category Description
03A	Field Training	Leave
03O	Field Training Supervisor	
AD	Administrative Leave (Paid)	
AI	Administrative Investigation Leave (Paid)	
AL	Administrative Leave (Unpaid)	
AV	Voluntary Work Furlough	
AW	Unpaid AWOL	
CFFH	California Family Rights Act (CFRA) Floating Holidays	
CFOU	Comp Time - CFRA	
CFSL	CFRA Unpaid	
CFSP	CFRA Sick	
CFVA	CFRA Vacation	
DP	Disability Pay	
EH	Equivalent Holiday (Out-Bank) Sworn	
EL	Education Leave Unpaid	
FCFH	Family Care Leave (FCL) Floating Holidays	
FCOU	Comp Time - Family Care Leave	
FCSL	FCL Unpaid	
FCSP	FCL Sick	
FCVA	FCL Vacation	
FD	Family Death	
FH	Floating Holiday Pay	
FMEH	Family Medical Leave Act (FMLA) - Equivalent Holiday (Out)	
FMHI	FMLA - Holiday	
FMIL	Holiday Bank - FMLA - 1021MS	
FMLA	FMLA	
FMOU	FMLA - Compensatory Time Off	
FMPE	FMLA - Fitness Time (Used)	
FMSL	FMLA - Sick Leave	
FMSP	FMLA - Sick Pay	
FMVA	FMLA - Vacation	
JD	Jury Duty Leave Pay	
LH	Legal Holiday Leave Pay	
LWHP	Like Work Like Pay Holiday Pay	
ML	Unpaid Military Leave	
MP	Military Leave Pay	
MPD	Military Pay - Deployed	
OU	Comp Time Pay (Out-Bank)	
PB	Parental Leave	
PBSL	Paid Parental Leave Unpaid	
PE	Fitness Time	

Time Reporting Code	Description	BLA Category Description
PL	Unpaid Personal Leave	
SD	Unpaid Disability Leave	
SL	Unpaid Sick Leave	
SN	Unpaid Suspension (Discipline)	
SP	Sick Pay Leave	
VA	Vacation Leave Pay	
LWTA	Like Work Traffic Admin	Like Work/Like Pay
LWTM	Like Work Traffic Motor	
LW	Like Work Like Pay	
7M	Meal Time (Unpaid)	Meal Time/Community Meeting
CM	Community Meeting (Unpaid)	
LWOE4	Like Work Miscellaneous OT Comp Time at 1.5	Miscellaneous
LWOT4	Like Work Miscellaneous OT Pay at 1.5	
OE4	Miscellaneous OT Comp Time at 1.5	
OT4	Miscellaneous OT Pay at 1.5	
ONP	On Call/Pay Request	On-Call
ONT	On Call/Time Request	
EX	Executive Pay	Other Premium Pay
EXP	Experienced Officer Incentive	
HC	Holiday Worked/Comp Time Requested	
HP	Holiday Worked/Pay Requested	
LWOT	Like Work OT	Overtime - Unspecified
OT	OT Unspecified	
OE	Comp Time Unspecified	
AE	Administrative Leave (Earn) Straight Time	
CW	Change of Watch	Regular Shift
IL	Holiday Earned (In Lieu)-Sworn	
OES	OT/Comp Time at Straight Time	
OS	Overtime at Straight Time	
PEE	Fitness Time Earned	
REG	Normal Shift or day of work	
LWOE5	Like Work Extended Work Week OT Comp Time at 1.5	
LWOT5	Like Work Extended Work Week OT Pay at 1.5	
OE5	Extended Work Week OT Comp Time at 1.5	
OT5	Extended Work Week OT Pay at 1.5	
TC	Training OT/Comp Time Requested	Training
TCS	Training OT/Comp Time at Straight Time	
TP	Training OT/Pay Requested	
TPS	Training OT at Straight Time	
H	Watch Off	Watch Off

Except where noted, the analysis of this data excludes hours worked by sworn staff detailed to Airport bureaus (SFP_DETAIL_ID = "AIRP", "AFOB", "ADMN", or "AINV"). The analysis combines arrest and investigation overtime into a single category (arrests/investigations overtime) because a review of overtime cards found that the two categories are sometimes used interchangeably for the same activities.

Calculating trends in overtime hours worked by sworn staff

Hours worked were totaled by time category listed in the table above (BLA Category Description) by fiscal year. Airport bureaus were excluded.

Calculating average annual overtime hours worked per sworn staff member

Overtime hours (including Chapter 10B, Arrests/Investigations, Events, Court, Training, and Miscellaneous) were totaled by sworn personnel by fiscal year. The annual average of overtime hours is the average by fiscal year among sworn staff who worked overtime in a given year. Overtime worked at the Airport bureaus is excluded.

Calculating trends in overtime hours worked by the frequent top 10 percent of users

To identify the frequent top 10 percent of overtime users, we identified the 90th percentile level of overtime worked (excluding Chapter 10B, Court, and Training) each fiscal year over a six-year period, from FY 2011-12 through FY 2016-17. For each fiscal year, individuals who worked more than the 90th percentile amount (e.g., 311 hours of overtime worked in FY 2015-16) were tagged as being in the top 10 percent group. We counted how many times each unique person ID was tagged in the top 10 percent group by fiscal year, and those individuals who were tagged for five or six of the six years analyzed were identified as the "frequent top 10 percent of users." Fifty-nine sworn staff fell within the top 10 percent group for five or six of the six years. We then totaled the hours worked by time category and by fiscal year for the 59 sworn staff in the frequent 10 percent of users group.

Calculating arrests/investigations overtime hours worked at district stations by officer experience and Field Training Officer status

To isolate the effect of new recruits on overtime and to capture the effect of the Multi-Year Hiring Plan, we evaluated the hours of arrests and investigations overtime worked at district stations beginning in January 2013. New recruits complete a 34-week training at the Academy prior to beginning practical training at district stations, and therefore new recruits hired under the Multi-Year Hiring Plan were not detailed to district stations until calendar year 2013.

To evaluate the trends in arrests and investigations overtime used by officers at district stations who are not involved in training, either as Field Training Officers (FTOs) or new recruits, we separated out the hours worked each month by new officers in field training and FTO officers.

Officers were tagged as “new” for the time period from the first day they recorded time at a district station to the end of their 16-week field training period, extended to the end of the month after the 16-week period (meaning that if a recruit’s 16-week field training period ended on June 6, 2017, that recruit’s time entries were tagged as a new officer for all June 2017 time entries).

Lateral recruits, who are Certified Peace Officers transferring to the Department from other law enforcement agencies, complete a shorter 8-week training period. Lateral recruits could not be distinguished from other new recruits if they started at the entry-level Q 2 officer job class. Therefore, in this analysis, lateral recruits were also tagged as “new” officers for approximately 16 weeks after starting work at a district station. Of the 833 recruits and laterals who completed academy classes between June 2012 and June 2017, 70 were laterals.

Officers were tagged as FTO officers in a month if they logged at least one instance of FTO time in that month.

Calculating occurrences of sworn staff exceeding overtime limits

To calculate instances where sworn staff exceed 14 hours in a 24-hour period, we totaled the hours worked by person by day, excluding on-call time and FTO hours because FTO time overlaps with regular shifts. During FY 2013-14, Department policy for recording Like Work/Like Pay time changed from in lieu of regular shift entries to in addition to regular shift entries, so Like Work/Like Pay time was excluded in FY 2013-14 and onward to avoid double counting. We then tagged each instance of working more than 14 hours in a day and tabulated the results by fiscal year.

To calculate instances where sworn staff worked more than 20 hours of overtime in a week, we totaled the hours of overtime (Chapter 10B, Arrest, Investigation, Miscellaneous, and Events) worked by person in a given week, tagged each instance of working more than 20 hours in a week, and tabulated the results by fiscal year.

To calculate instances of sworn staff working more than 520 hours of overtime in a year, we totaled the hours of overtime (Arrest, Investigation, Miscellaneous, and Events) by person by fiscal year and tagged instances of working more than 520 hours in each fiscal year.

Practices of Other Police Departments

Overtime Pre-Approval

Benchmarking results: In our survey of overtime usage at police departments in comparable cities, seven out of eight surveyed police departments indicated that pre-approval is required for most or all types of overtime. Police departments employ different strategies to record the overtime pre-approval, including:

- In Seattle, the overtime request and supervisor approval is recorded in the City’s electronic timekeeping system.

- In Oakland, overtime pre-approval is recorded on an overtime slip that is signed by the supervisor and commander.
- In San Diego, all overtime is recorded on an authorization form that requires a signature from the supervisor authorizing the overtime.
- Denver noted that enforcing its pre-approval requirement was key in reducing overtime in recent years. In Denver, overtime pre-approval must

Monitoring High Use

Benchmarking results: Several police departments indicated that they report individual overtime usage and usage by high-user groups.

- In Denver, overtime reports specifically detail the usage of specific high users and the usage of shift-extension overtime.
- Oakland reports include detailed information on dollar amount spent on overtime by month per employee.



EDWIN M. LEE
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WILLIAM SCOTT
CHIEF OF POLICE

June 8, 2018

Severin Campbell
San Francisco Board of Supervisors
Budget and Legislative Analyst's Office
City Hall, Room 244

RE: Performance Audit – Staffing and Deployment of the San Francisco Police Department

Dear Ms. Campbell,

Thank you for the opportunity to review the draft performance audit report and your incorporation of feedback we provided. We appreciate your willingness to include the San Francisco Police Department's formal response to the audit findings and recommendations in your final report.

There were eight recommendations ultimately made. The Department agrees with four of those recommendations (Recommendations 1.1, 2.1, 4.2, and 4.3, respectively) and compliance efforts are currently in progress.

The Department partially agrees with Recommendation 4.1. We recognize the need for the establishment of additional, expanded written overtime policies and associated training on those policies. However, the monitoring of supervisory compliance with overtime approval guidelines need not be bound solely to performance evaluations. We believe there are other mechanisms through which compliance can be monitored.

The Department partially agrees with Recommendation 5.2. We have already identified 25 positions for immediate civilianization as reflected in the FY 18-19 Mayor's budget proposal. The remaining positions identified in this report as ones that should be civilianized are, in fact, positions that should be held by sworn personnel due to the law enforcement expertise they require.

The Department disagrees with Recommendation 2.2 which calls for the shift to an 8 hour, 5 days on / 2 days off schedule or a 10 hour, 4 days on / 3 days off schedule. We cannot accomplish this in the immediate term due to the collective bargaining rights afforded to employees under the Meyers-Milias Brown Act. Additionally, the report suggests that the sign-up period be adjusted to mitigate fairness issues that may arise with the adoption of the schedule proposed by this report. The sign-up period is bound by the Department's MOU agreement with the POA. However, the Department will continue to analyze and assess weekly work schedules and shifts to optimize deployment.

The Department also disagrees with Recommendation 3.1. Placing supervisors on the proposed staggered fourteen day schedule would not provide adequate supervision of and for officers. The staggered fourteen day schedule would actually reduce the amount of time a supervisor sees officers and broaden the pool of officers to be supervised. This prevents supervisors from being able to closely monitor officers sufficiently. The staggered fourteen day schedule would also leave the Department short-handed for longer periods of time when a supervisor is off work. The Department believes that supervisors' schedules should coincide as much as possible with the schedules of their subordinates they are directly responsible for supervising.

In addition to the remarks above, detailed comments related to each of the recommendations are documented in the attached Response Matrix.

The San Francisco Police Department genuinely appreciates all of your agency's efforts in completing the performance audit of our staffing and deployment procedures. Your agency has expended great amounts of effort collecting and analyzing the information we provided. We appreciate the opportunity you provided us to make this a collaborative process. We will be moving forward with implementing the recommendations with which we concur. We hope to make positive, meaningful changes that will improve the efficiency of our Department and help us maintain the safety of the public.

Sincerely,


WILLIAM SCOTT
Chief of Police

Enclosure

cc: Assistant Chief Hector Sainez, Chief of Staff, SFPD
Deputy Chief Robert Moser, SFPD
M. Catherine McGuire, Chief Financial Officer, SFPD
Lieutenant Nicole Jones, SFPD

Budget and Legislative Analyst's Recommendations

Recommendation	Priority	Department Response	Department Comments
1.1 Establish a call for service time target as the Department's baseline performance objective, and allocate patrol officers to the ten districts based on this call for service objective.	1	Agree	The Office of the Controller recently completed a comprehensive patrol workload analysis on behalf of the Department. As part of this process, the Department preliminarily identified a 30% baseline performance objective with flexibility up to 35% as necessary in regards to the amount of time patrol officers should be spending handling calls for service. The Department recognizes the need to formalize this performance objective.
2.1 Evaluate existing W/O group and shift assignments by police district and develop protocols for the police district captains to more efficiently assign patrol staff to W/O groups and shifts.	2	Agree	The Department acknowledges the need to shift to a more data-driven approach as it relates to staffing and deployment decisions. The Department recently created a Staffing and Deployment Unit to assist and maintain this effort.
2.2 Adopt either an 8 hour, 5/2 or a 10 hour, 4/3 weekly work schedule to improve the consistency of daily staffing in the Police Districts.	2	Disagree	SFPD cannot accomplish this recommendation in the immediate term due to collective bargaining rights afforded to employees under the Meyers-Milias Brown Act. However, we will continue to analyze and assess weekly work schedules and shifts to optimize deployment. The Staffing and Deployment Unit has been established to achieve this. The report also suggests that the Department shorten the sign-up period or make some other adjustment within the sign-up period to counteract fairness issues that may arise with the proposed schedule change. However, the sign-up period is bound by the current, newly negotiated MOU agreement with the POA.
3.1 Subsequent to elimination of the 49 day rotation period, re-align the span of control by placing supervisors on a staggered fourteen day schedule.	3	Disagree	Realigning the span of control by placing supervisors on a staggered fourteen day schedule would not provide adequate supervision for officers. The Department believes it to be necessary to have supervisors interacting with the same officers on a regular basis, providing consistency in performance evaluation. A staggered schedule both broadens the pool of officers to be supervised and shortens the time spent with each officer. This prevents the supervisor from having adequate time for attention to detail and observing and regulating patterns of behavior and performance. Additionally, such a schedule leaves the Department short-handed for longer periods when a supervisor is on vacation or off work for other reasons.

Priority 1 recommendations should be completed by December 31, 2018

Priority 2 recommendations should be completed by June 30, 2019

Priority 3 recommendations should be completed by December 31, 2019

Budget and Legislative Analyst's Recommendations

Recommendation	Priority	Department Response	Department Comments
4.1 Develop and implement overtime policies, including (1) written guidelines for police district captains, lieutenants, and sergeants on approving shift extension overtime, including specific criteria for when approval of shift extension overtime is appropriate; (2) incorporation of compliance with overtime approval guidelines (including enforcement of existing policies on pre-approval and sign-off of overtime on timecards) into captain, lieutenant, and sergeant annual performance evaluations; and (3) required training for captains, lieutenants, and sergeants on implementation of overtime policies and procedures.	1	Partially Agree	The Department acknowledges the need for the development and implementation of additional, expanded written overtime policies and guidelines as well as any corresponding training that would be necessary. However, monitoring compliance can be achieved through mechanisms other than performance evaluations.
4.2 Increase oversight of overtime Department-wide and by police district and revise biweekly reporting requirements to better identify and correct unusual, unexplained, or disproportionate use of overtime (including high users); and identify and reduce occurrences of overtime that exceed Department and City overtime limits.	1	Agree	The Department has already increased reporting efforts related to individual overtime use. In FY 17-18, the Department will have stayed within budgeted overtime expenditures, with the exception of mutual aid to the Sonoma fires. The Department is committed to redoubling these efforts to continue this trend.
4.3 Incorporate analysis of cost-effectiveness of overtime and alternatives to overtime use to accomplish tasks or program objectives into the annual budget.	1	Agree	The Department makes decisions about the use of overtime on a day-in day-out basis. The Department staffs special events with on duty officers at a higher rate than it utilizes officers being paid overtime. The Department will continue to increase that rate as staffing increases in the Department. In addition, in collaboration with other agencies, the Department reviews their requests for police services to determine whether on duty officers or overtime officers are the most efficient uses of resources. The Department is committed to continuing and improving such efforts.
5.2 Work with the Mayor's Office to expedite the immediate civilianization of at least 30 positions in the Administration Bureau currently filled by officers, in order to redeploy those officers in to the field.	1	Partially Agree	SFPD has identified 25 positions for immediate civilianization as reflected in the FY 18-19 Mayor's budget proposal. The remaining positions are ones which the Department believes must be filled by officers, rather than non-sworn personnel, as their law enforcement expertise is vital to the functions they are performing.

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