

The Sheriff's Department's Underreporting of Civilian Stop Data to the California Attorney General

June 10, 2022

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SUMMARY

Pursuant to the Racial and Identity Profiling Act (RIPA) of 2015,¹ the Los Angeles County Sheriff's Department (Sheriff's Department) is required to report annually to the California Attorney General the perceived race/ethnicity, gender, and approximate age of the people Sheriff's Department deputies detain, search, or arrest.

Sheriff's Department compliance with RIPA has been hampered by its outdated computer system. The Computer Aided Dispatch System (CAD) is the Sheriff's Department's primary data system for tracking patrol-related contacts with the public. The CAD system was developed in the 1980s and runs on technology which is nearly four decades old and cannot be updated to track the additional data points mandated by RIPA. As a result, the Sheriff's Department created the Sheriff's Automated Contact Reporting System (SACR), which is a completely separate data tracking system, to track RIPA data. Unfortunately, the two data systems are unable to interface with each other, forcing Sheriff's Department deputies to enter data into the CAD system and then separately enter duplicative data into the SACR system.

The Office of Inspector General monitored the implementation of the SACR system. The Office of Inspector General was concerned that requiring deputies to enter information into two separate data systems could result in a lack of compliance with RIPA mandates. To investigate this concern, the Office of Inspector General requested CAD system data for **all civilian contacts** that would have required a subsequent entry into the SACR system for the period of July 1, 2018, through June 30, 2019. In response to our request, the Sheriff's Department provided a **limited set of CAD data**, consisting of 281,345 civilian stops resulting from deputy observations and 5,667 stops resulting from calls for service.

The Office of Inspector General then downloaded publicly available civilian stop data from the SACR system for the time-period of July 1, 2018, through June 30, 2019. In addition, the Office of Inspector General reviewed Risk Management Forum² statistics regarding arrests over that time-period. The Office of Inspector General then compared

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¹ See, Assembly Bill 953: The Racial and Identity Profiling Act of 2015 (2015) at https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB953 (Accessed December 28, 2021). RIPA added sections relating to data collection and racial profiling training to Government Code section 12525.5 and Penal Code sections 13012 and 13519.4. RIPA required the Los Angeles County Sheriff's Department to begin reporting data by April 1, 2019. California Government Code section 12525.5(a)(2).

² The Risk Management Forum is an internal risk management process where the Sheriff's Department executives and captains from each station/division meet twice a year to review incident statistics, including but not limited to: calls for service; observations; uses of force; arrests; administrative investigations; complaints; pursuits and other statistics.

the CAD system data and the Risk Management Forum statistics to the SACR system data.

Compared to the CAD system data, the Office of Inspector General found the SACR system underreported **observation-based stops by** at least **50,731**. The variances in observation stop totals occurred mainly in the Sheriff's Department's patrol divisions. However, these variances were not concentrated in any one particular patrol division, which indicates the practice of not entering data into the SACR system may be pervasive and widespread throughout all of the Sheriff's Department's patrol divisions. In addition, the Office of Inspector General found significant differences between CAD system and SACR system totals relating to backseat detentions, consent searches, and reasonable suspicion stops. Moreover, the Office of Inspector General identified issues regarding CAD system clearance codes and the CAD system's inability to record stops involving multiple detainees that might result in further underreporting of RIPA data. In comparison to Risk Management Forum statistics, the Office of Inspector General found the SACR system underreported arrests by at least **71,462**.

This is not the first time the Office of Inspector General has reported on Sheriff's Department data recording and reporting issues.⁵ What makes the data issues discussed in this report of critical concern are that: (1) state law mandates the Sheriff's Department report this RIPA data accurately to the California Attorney General and (2) the Sheriff's Department has been aware of inaccuracies in the SACR system and has not implemented sustainable changes to rectify these inaccuracies or placed any

³ As defined by the Sheriff's Department's <u>Manual of Policy and Procedures section 5-09/520.25</u>, observation stops are any "significant public contacts and activities" which a patrol deputy self-initiated and were not from a call for service. These types of significant public contacts and activities are entered into the CAD system as an "OBS" or observation. For this review, the Sheriff's Department provided data for pedestrian, bicycle and vehicle stops.

⁴ The Office of Inspector General found there were more calls for service entered into the SACR system than into the CAD system. The Sheriff's Department provided CAD data on 5,667 stops resulting from calls for service. However, the SACR system recorded a far greater number of stops resulting from calls for service -- 20,989 stops. This variance suggests the Sheriff's Department may not have provided the Office of Inspector General with a complete CAD data set for calls for service. Due to this variance and to avoid making conclusions using incomplete data, the Office of Inspector General refrained from comparing CAD system and SACR system totals for stops resulting from calls for service. We confined our analysis of the Sheriff's Department-provided CAD system data to stops resulting from deputy observations. However, we also identified Risk Management Forum statistics as another source of CAD system-based data for general totals of arrests, observations, and calls for service handled by the Sheriff's Department.

⁵ See Max Huntsman Memorandum to the Board of Supervisors, July 24, 2018, "Report Back on the Sheriff's Department's Plan to Upgrade the Data Systems Used to Track Jail Violence," and Office of Inspector General's July 2017 report, "A Review of the Jail Violence Tracking and Reporting Procedures of the Los Angeles County Sheriff's Department."

cautionary wording and/or caveats on the data to inform the reader that such inaccuracies exist.

In December 2020, the Office of Inspector General contacted Sheriff's Department representatives and expressed concerns over the accuracy of SACR system data. Sheriff's Department representatives acknowledged there were issues in the SACR system data and assured the Office of Inspector General steps would be taken to prevent future misreporting of stop data to the State of California.

Approximately a year later, in December 2021, the Office of Inspector General staff again met with Sheriff's Department representatives to reiterate concerns about the accuracy of the SACR data reported to the California Attorney General pursuant to RIPA. Sheriff's Department representatives again conceded the Sheriff's Department was not in compliance with RIPA requirements. Moreover, the Sheriff's Department reported it had been unable to implement its plan to create a system to reconcile CAD and SACR system totals due in large part to their outdated CAD system. As a result, the Sheriff's Department still has not implemented a process to audit SACR system data and verify its accuracy.

Even without a full audit of the two data systems, the Office of Inspector General's review of CAD system and SACR system data found that the Sheriff's Department significantly underreported the number of its civilian stops and arrests in the SACR system by comparing the number of the arrests in the SACR system to the number of arrests in the CAD system. What is most alarming is the size of the discrepancies between the two systems, with observed differences in the thousands. The Office of Inspector General infers the primary drivers fueling these discrepancies between the two data sets are that deputies are failing to enter civilian stop data into the SACR system after entering it into the CAD system and supervisors are not identifying the discrepancies when they occur. At the end of this report, the Office of Inspector General provides several recommendations aimed at improving the accuracy of the SACR system data.

THE RACIAL AND IDENTITY PROFILING ACT (RIPA) OF 2015

On October 3, 2015, the Racial and Identity Profiling Act (RIPA)⁶ was signed into law in an effort to eliminate "racial or identity profiling" by peace officers. RIPA defines "racial or identity profiling" as:

⁶ Assembly Bill 953: The Racial and Identity Profiling Act of 2015 (2015) at https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB953 (Accessed December 28,

[T]he consideration of, or reliance on, to any degree, actual or perceived race, color, ethnicity, national origin, age, religion, gender identity or expression, sexual orientation, or mental or physical disability in deciding which persons to subject to a stop or in deciding upon the scope or substance of law enforcement activities following a stop, except that an officer may consider or rely on characteristics listed in a specific suspect description. The activities include, but are not limited to, traffic or pedestrian stops, or actions during a stop, such as asking questions, frisks, consensual and nonconsensual searches of a person or any property, seizing any property, removing vehicle occupants during a traffic stop, issuing a citation, and making an arrest.⁷

California Assembly member Shirley Weber introduced RIPA as Assembly Bill 953 (AB 953). Assembly member Weber stated this legislation was intended to:

[C]onfront some ugly truths about the persistence of racial bias in law enforcement. One of our best defenses is information. Currently, this information on these incidents isn't provided publicly in a comprehensive way. The goal of AB 953 is to rectify that.⁸

Prior to the passage of RIPA, the State of California did not collect, analyze, or make available state-wide information about police stops, searches or arrests. With the passage of RIPA, law enforcement agencies are now required to report the perceived race or ethnicity, gender, and approximate age of the people they stopped, searched, or arrested. RIPA further mandated the California Attorney General to establish a Racial and Identity Profiling Advisory Board (RIPA Board), whose mission would be to eliminate racial and identity profiling in law enforcement.

The RIPA Board is tasked "to investigate and analyze state and local law enforcement agencies' racial and identity profiling policies and practices across geographic areas in California, receive data and policies regarding law enforcement stops from all law

^{2021).} This legislation added sections relating to data collection and racial profiling training to Government Code section 12525.5 and Penal Code sections 13012 and 13519.4.

⁷ See RIPA as codified at Penal Code section 13519.4(e).

⁸ American Civil Liberties Union, "Breaking: Racial Profiling Bill Heads to California Senate," ACLU, June 3, 2015. https://www.aclusocal.org/en/press-releases/breaking-racial-profiling-bill-heads-california-senate (Accessed December 28, 2021).

enforcement entities within California, and provide annual reports regarding the stops."⁹ Law enforcement agencies are required to provide the RIPA Board with an annual report detailing the following information for each civilian stop¹⁰ conducted:

- (1) The time, date, and location of the stop.
- (2) The reason for the stop.
- (3) The result of the stop, such as, no action, warning, citation, property seizure, or arrest.
- (4) If a warning or citation was issued, the warning provided, or violation cited.
- (5) If an arrest was made, the offense charged.
- (6) The perceived race or ethnicity, gender, and approximate age of the person stopped, provided that the identification of these characteristics shall be based on the observation and perception of the peace officer making the stop, and the information shall not be requested from the person stopped. For motor vehicle stops, this paragraph only applies to the driver, unless any actions specified under paragraph (7) apply in relation to a passenger, in which case the characteristics specified in this paragraph shall also be reported for him or her.
- (7) Actions taken by the peace officer during the stop, including, but not limited to the following:
 - (A) Whether the peace officer asked for consent to search the person, and, if so, whether consent was provided.
 - (B) Whether the peace officer searched the person or any property, and, if so, the basis for the search and the type of contraband or evidence discovered, if any.
 - (C) Whether the peace officer seized any property and, if so, the type of property that was seized and the basis for seizing the property.¹¹

In order to "address the pernicious practice of racial or identity profiling," ¹² RIPA further mandated the Commission on Peace Officer Standards and Training to develop and disseminate guidelines and training for all peace officers in California on the racial and cultural differences among the residents of this state. RIPA states this training should emphasize "understanding and respect for racial, identity, and cultural differences, and development of effective, noncombative methods of carrying out law enforcement duties in a diverse racial, identity, and cultural environment." ¹³

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⁹ Ibid.

¹⁰ A stop is defined in California Code of Regulations 999.224 (a)(14) as "any detention by a peace officer or a person or any peace officer interaction with a person in which the officer conducts a search, as defined in these regulations."

¹¹ See Government Code section 12525.5(2)(b).

¹² See California Penal Code section 13519.4(d)(5).

¹³ See California Penal Code section 13519.4(a).

In September 2017, the California Department of Justice implemented regulations governing RIPA compliance.¹⁴ These regulations required the Sheriff's Department to begin collecting data as of July 2018 and report that data to the RIPA Board by April 1, 2019. In 2019, the Sheriff's Department sent its first collection of RIPA data to the Attorney General, covering the time-period of January 1, 2018 through December 31, 2018. The RIPA Board took and incorporated the Sheriff's Department's data into its 2020 Annual Report.¹⁵ As of the writing of this report, there is no mention of any SACR accuracy issues on the Sheriff's Department's website, which publishes this data.¹⁶

THE COMPUTER AIDED DISPATCH SYSTEM (CAD)

The Sheriff's Department's primary data system for tracking patrol-related contacts with the public is the Computer Aided Dispatch System (CAD).¹⁷ The CAD system was developed and implemented in the late 1980's. The CAD system is linked to Sheriff's Department dispatch centers, which assign deputies to respond to calls for service. Deputies also use the CAD system to log their actions or observations such as traffic, pedestrian, and bicycle stops.

Although the Sheriff's Department is aware of the deficiencies in the CAD system, it has not upgraded the CAD system current with new technologies. Due to the age of the system, it is unable to be upgraded to implement new functions or to facilitate information transfer/connectivity with newer data systems. According to Sheriff's Department representatives, replacing the CAD system would require several million dollars and a substantial staffing commitment.

¹⁴ See "Stop Data Regulations, California Racial and Identity Profiling Act of 2015 (AB953)," California Attorney General's Office, accessed January 29, 2021. https://oag.ca.gov/ab953/regulations.

¹⁵ Racial and Identity Profiling Board, "2020 Annual Report," California Attorney General's Office, https://oag.ca.gov/sites/all/files/agweb/pdfs/ripa/ripa-board-report-2020.pdf; and Racial and Identity Profiling Board, "2021 Annual Report," California Attorney General's Office, https://oag.ca.gov/sites/all/files/agweb/pdfs/ripa/ripa-board-report-2021.pdf.

¹⁶ See Assembly Bill 953 – The Racial and Identity Profiling Act of 2015, Sheriff's Automated Contact Reporting (SACR) System at https://lasd.org/SACR opendata.html (Accessed January 18, 2022).

¹⁷ The Sheriff's Department's Manual of Policy and Procedure 5-09/520.25 requires deputies enter into the CAD system: "all significant public contacts and activity shall be appropriately logged...and shall contain only accurate information including, but not limited to, the race of each individual detained or searched, the result of the stop, and the date, time, and location of the stop." The Manual of Policy and Procedure 5-09/520.25 defines significant contacts and activity as: calls for service; self-initiated activity which results in arrest or citation; self-initiated activity which is enforcement/investigative in nature but does not result in arrest or citation; and/or self-initiated activity which is not enforcement/investigation in nature but results in Sheriff's Department personnel taking constructive action, i.e., requesting a tow truck for a stranded motorist.

Although the Sheriff's Department has periodically explored replacing the CAD system, it has not taken significant steps to implement a replacement. The Sheriff's Department continues to use a system that is outdated and maintained by a part-time consultant. This part-time consultant is a retired Sheriff's Department employee who may soon end his contract, leaving the Sheriff's Department and its primary computer system with no lifeline for when the CAD system inevitably fails given that it has far outlived its product life cycle. A large-scale failure of the CAD system would not only affect recordkeeping functions, it would also affect the ability of deputies to communicate in the field, the dispatchers' ability to relay information to deputies, and many other essential functions that deputies rely on to perform their jobs.

THE SHERIFF'S AUTOMATED CONTACT REPORTING SYSTEM (SACR)

In response to the passage of RIPA, the Sheriff's Department's reviewed the CAD system and determined that it was not capable to be used to collect and report RIPA mandated data. As a result, the Sheriff's Department created the Sheriff's Automated Contact Reporting System (SACR). However, the two data systems are unable to interface with each other, again largely due to the obsolescence of the CAD system. Information entered into the CAD system cannot be exported to the SACR system. As a result, deputies must separately enter the details of a civilian stop into the CAD system and then enter many of the same details into the SACR system to comply with RIPA.

The Sheriff's Department's Field Operations Directive (FOD) 18-004 states deputies **shall make** a "stop data" entry into the SACR system after conducting a qualifying civilian contact to comply with the requirements of RIPA.¹⁹ This directive makes it clear that a SACR system entry is "separate and additional from the required entries into the Computer Aided System (CAD), per Sheriff's Department Manual of Policy and Procedures section 5-09/520.25."²⁰ As a result, deputies must make a SACR entry for a qualifying civilian contact **in addition** to entering that contact into the CAD system.

Per FOD 18-004, deputies must enter all civilian contacts into the SACR system which involve the following situations:

¹⁸ Barriers to integration between CAD and SACR are primarily software-based. However, there are also multiple differences in coding and input requirements between CAD and SACR which makes the cross population of data problematic. For example, the CAD system has 13 reason codes for a civilian stop, which are identified by different letters of the alphabet. The SACR system has only eight reason codes, but they are identified and inputted numerically.

¹⁹ See Sheriff's Department's Field Operations Directive (FOD) 18-004 and Manual of Policy and Procedures section 5-09/520.25.

²⁰ Ibid.

- Detentions,
- Searches of people or property under a person's control (including consensual search), or
- Arrests.

Certain civilian contacts are exempted from RIPA reporting requirements. The exempted contacts are listed as follows:

- Custodial settings.
- Mass evacuations.
- Active shooter incidents.
- Routine security screenings.
- Checkpoints or roadblocks (unless additional action is taken).
- Interaction with a person who is the subject of a warrant or search at their residence.
- Traffic control of vehicles due to traffic accident or emergency.
- Crowd control.
- Person detained at residence only to verify proof of age regarding underage drinking.

With respect to stops of civilians, so long as the stop is not on the exempted list, deputies must enter RIPA data, including race, gender, reason for stop, result of stop, and other stop-related data into the SACR system. FOD 18-004 requires deputies to complete their SACR system entries by the end of their shifts unless there are exigent circumstances. Moreover, Sheriff's Department supervisors are then **required** to review SACR entries to ensure they are complete.

CAD DATA COMPARED TO SACR DATA

In 2019, the Sheriff's Department sent the Attorney General its first collection of RIPA data, which covered the time-period of January 1, 2018 through December 31, 2018. The Office of Inspector General monitored the implementation of the RIPA reporting process and became concerned with potential discrepancies between the SACR system and the CAD system. In particular, the Office of Inspector General was concerned that requiring Sheriff's Department deputies to enter information into both the CAD and SACR data systems might result in a lack of compliance with entering RIPA data into the SACR system. Office of Inspector General staff compared data entered into the CAD and SACR systems for the period of July 1, 2018 to June 30, 2019 to determine if there were any discrepancies between the two systems.

To do this comparison, the Office of Inspector General first requested CAD system data for all civilian contacts that would have required a subsequent entry into the SACR

system for the period of July 1, 2018 through June 30, 2019. This request encompassed all civilian stops resulting from deputy "observations" as well as from "calls for service," the same data required by RIPA per Field Operations Directive (FOD) 18-004. In response, the Sheriff's Department provided the Office of Inspector General a limited set of CAD system data of 281,345 observation stops and only 5,667 calls for service stops. Since the SACR system data was readily available to the public on the Sheriff's Department's website,²¹ Office of Inspector General staff downloaded²² SACR system data for the same time-period of July 1, 2018 through June 30, 2019.

Office of Inspector General staff noted there were a greater number of calls for service entered in the SACR system than in the CAD system. The Sheriff's Department provided CAD data on 5,667 stops resulting from calls for service. However, the SACR system recorded a far greater number of stops resulting from calls for service -- 20,989 stops. This variance suggests the Sheriff's Department may not have provided the Office of Inspector General with a complete CAD data set for calls for service²³. Due to this variance, the Office of Inspector General refrained from comparing CAD system and SACR system totals for stops resulting from calls for service. We confined our analysis of the Sheriff's Department-provided CAD system data to stops resulting from deputy observations.

To ensure this analysis compared similar data, Office of Inspector General staff filtered out all data entries resulting from "calls for service" from both the CAD systems data²⁴ and the SACR system data,²⁵ leaving only observation stops. Office of Inspector

²³ An attempt was made via email to the Sheriff's Department to confirm the total number of observations versus calls for service in the data set provided. The Sheriff's Department did not respond to this email. It is not uncommon for Office of Inspector General requests for information to go unanswered. Given the Sheriff's Department failure to confirm the data or explain the discrepancy, the Office of Inspector General conducted its own analysis to determine the number of calls for service contained in the data set. *See footnote 24 below*.

²⁴ The CAD system was queried to extract all those incidents containing clearance codes 840, 841 and 842. These clearance codes pertain to traffic, pedestrian and bicycle stops respectively. Calls for service stops that were provided totaled 5.667 stops, which consisted of 4.890 stops logged as "BSD-Call for Service" in the "Contact Type"

²¹ http://lasd.org/SACR opendata.html. (Accessed October 15, 2020, and October 20, 2020).

²² Ibid

clearance codes pertain to traffic, pedestrian and bicycle stops respectively. Calls for service stops that were provided totaled 5,667 stops, which consisted of 4,890 stops logged as "BSD-Call for Service" in the "Contact Type" field, 706 stops logged as a "Call for Service" in the "Reason for Contact" field, and 71 stops containing both indicators.

²⁵ In the SACR system there is a column labeled "Calls for Service" with an input option of "True" or "False." Entries are categorized as either a "Call for Service," which would be marked as "True," or not a "Call for Service," which would be marked as "False." Entries designated with "False" are classified as observation-based stops/searches/arrests. There were no blank entries in this column or entries marked with any other designation other than "True" or "False."

General staff then compared the CAD system data and the SACR system data to determine the following:

- 1. Number of total monthly stops;
- 2. Stops by race of the person contacted;
- 3. Stops by station or unit of assignment; and
- 4. Discrepancies in recorded number of backseat detentions, consent searches, and reasonable suspicion stops.

Number of Monthly Stops: the SACR System Reported 50,731 Fewer Observation-Based Stops than the CAD System

The Office of Inspector General found deputies logged **50,731 fewer** observation stops into the SACR system than into the CAD system, an **18.03%** underreporting of stops resulting from deputy observations in the SACR system.

			Difference =
Month	CAD System Totals	SACR System Totals	CAD -SACR
July 2018	24,413	25,788	-1,375
August 2018	24,084	23,813	271
September 2018	22,580	21,231	1,349
October 2018	23,671	21,113	2,558
November 2018	17,867	15,432	2,435
December 2018	19,018	15,262	3,756
January 2019	22,401	17,706	4,695
February 2019	21,932	16,363	5,569
March 2019	23,824	17,465	6,359
April 2019	26,949	19,924	7,025
May 2019	29,855	20,368	9,487
June 2019	24,751	16,149	8,602
Totals	281,345	230,614	50,731

The monthly totals show a divergence in observation stop totals between the two systems steadily increased until reaching a high of 9,487 in May 2019. The only instance where SACR system entries exceeded CAD system entries was in July 2018 -- when the Sheriff's Department trained all deputies on the SACR system during the system's initial implementation. After the initial rollout and training on the SACR system, the SACR system consistently had fewer stop entries than the CAD system.

This increasing divergence over time may be linked to a change in SACR system training. In 2018, when the Sheriff's Department first implemented the SACR system, it conducted a centralized training program, holding 2-hour training classes for all

deputies in the field. Thereafter, the Sheriff's Department shifted SACR training duties to unit-level staff, relying on those initially trained deputies to train newer deputies. The time-period of this centralized training, where each deputy was given a 2-hour training class, generally corresponded with the smallest observed divergences between CAD and SACR system stop totals. When the training responsibility shifted to internal trainers and/or fellow deputies, there were fewer entries into the SACR system. The shift to unit-level SACR training may have played a part in the increasing disparity between CAD and SACR totals and reimplementing centralized training should be considered by the Sheriff's Department.

A lack of monitoring and oversight by Sheriff's Department supervisors to verify compliance with SACR system data entry rules also likely played a part in the variance between the two systems. The data suggests that as time went on, Sheriff's Department supervisors may have grown less diligent about ensuring deputies entered SACR data as required by FOD 18-004. If supervisors were monitoring the SACR system compliance as thoroughly as the directive requires, a variance in stop totals this large should not exist.

Stops by Race: The SACR System Underreported Stops of Hispanic People by 33,531 in Comparison to the CAD System

The CAD and SACR systems use the same common designations for classifying the race of the person(s) stopped: Hispanic, White, Black, Asian, Native American and Pacific Islander. However, the SACR system has two additional race designations which the CAD system does not use, one for "Middle Eastern or South Asian" and another for multi-racial people. The CAD system uses a category titled "other" to track people of races other than the six pre-designated race classifications stated above. For equivalence of comparison, the Office of Inspector General mirrored the CAD system conventions and grouped persons identified as "Middle Eastern or South Asian," and/or multiple races in the SACR system into a category entitled "other" in the chart below.

<u>Race</u>	CAD System	SACR System	Difference= CAD-SACR
Hispanic	147,014	113,483	33,531
White	63,471	53,180	10,291
Black	45,522	38,708	6,814
Asian	16,379	14,591	1,788
Native American	83	191	-108

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²⁶ In addition to unit-level SACR training, the Sheriff's Department also publishes briefs and refresher bulletins to remind deputies of how to enter data into the SACR system to help provide guidance.

Grand Total	281,345	230,614	50,731
Pacific Islander	358	1,220	-862
Other	8,518	9,241 ²⁷	-723

This chart compares the number of the stops between the CAD system and the SACR system as classified by the race of the person stopped and listed in the order of the largest to smallest differences between the two systems.

Stops involving Hispanic people made up the largest divergence between race groups with a difference of 33,531 stops between the CAD and SACR system totals. Hispanic people constituted 52.2% and 49.2% of all the observation stops in the CAD and SACR systems respectively. Hispanic people constituted **66.0%** of all the underreported observation stops in the SACR system. ²⁸ This data suggests that there is a higher probability that stops of Hispanic people are underreported in the SACR system when compared to all other race groups.

Stops by Unit: Patrol Stations Accounted for Most of the Differences Between the CAD and SACR System Stop Totals

Deputies from all Sheriff's Department patrol stations, bureaus and specialized units are required to log their stops in the CAD and SACR systems. As patrol station deputies conduct the vast majority of civilian stops, patrol stations account for most of the differences in stop totals between the two data systems. The following is a list of observation stop totals by station/bureau/unit in order of largest to smallest differences between the two systems (patrol stations are depicted with a "P"):

Station Unit	CAD System Totals	SACR System Totals	Difference= CAD-SACR
Lakewood (P)	27,458	20,267	7,191
East Los Angeles (P)	14,486	8,246	6,240
Temple(P)	12,299	6,402	5,897
Santa Clarita Valley(P)	24,604	20,187	4,417
Century(P)	13,036	9,007	4,029
Lomita(P)	11,689	7,662	4,027
Malibu Lost Hills(P)	17,863	14,303	3,560
Industry(P)	21,118	18,149	2,969
Palmdale(P)	20,596	18,029	2,567
San Dimas(P)	7,863	5,312	2,551
Crescenta Valley(P)	9,339	7,368	1,971
Carson(P)	9,885	7,958	1,927

 $^{^{27}}$ Includes persons of mixed race and persons of Middle Eastern/ South Asian descent.

²⁸ The difference between the CAD and SACR systems of 33,531 stops of Hispanic people divided by the total divergence in stop totals, 50,731 stops equal 66.0%.

West Hollywood(P)	9,579	8,225	1,354
Walnut(P)	8,809	7,685	1,124
Other	2,242	1,376	866
Pico Rivera(P)	5,851	5,147	704
Parks Bureau	2,356	1,898	458
Cerritos(P)	7,764	7,564	200
Marina Del Rey(P)	2,408	2,259	149
Emergency Operations Bureau	130	13	117
Lancaster(P)	19,455	19,357	98
County Services Bureau	361	273	88
Special Enforcement Bureau	48	0	48
Avalon(P)	290	251	39
Community College Bureau	61	43	18
MET Team	1	0	1
Lennox	0	2	-2
Air Bureau	0	5	-5
Detective Bureau	0	23	-23
Court Services Bureau	2	54	-52
Transit Services Bureau	5,048	5,265	-217
Compton(P)	9,923	10,284	-361
Norwalk(P)	11,674	12,226	-552
South Los Angeles(P)	5,107	5,774	-667
Totals	281,345	230,614	50,731

As set forth above, patrol station deputies entered **49,892**²⁹ **fewer** observation-based stops in the SACR system than the CAD system.

The ten units exhibiting the highest divergence in stop totals were all patrol stations and accounted for 85.6% (43,448³⁰ of 50,731) of the total observed variance between the two data systems. These stations are located within all four Sheriff's Department patrol divisions.³¹ The observed discrepancies in observation stop totals between the two systems was not concentrated in any one particular patrol division which indicates the practice of not entering data into the SACR system is pervasive and widespread throughout all Sheriff's Department's patrol divisions.

²⁹ 49,892 is the sum of all the patrol stations indicated with "P" next to each station.

³⁰ 43,448 is the sum of the top 10 patrol stations listed in the table above.

³¹ The ten patrol stations exhibiting the greatest divergence between CAD and SACR totals were: two stations from Central Division (East Los Angeles, Century), two stations from South Division (Lomita, Lakewood), three stations from North Division (Santa Clarita, Malibu-Lost Hills, Palmdale), and three stations from East Division (Temple, Industry, San Dimas).

Other Differences in Data Totals between the CAD and SACR Systems

Lastly, the Office of Inspector General staff observed significant differences between the CAD and SACR systems in the totals of: (1) stops where civilians were placed inside a patrol car (backseat detentions), (2) stops where consent searches were conducted, and (3) stops where a search was conducted based on reasonable suspicion the person being stopped was engaged in criminal activity.

Type of Stop	CAD System	SACR System	Difference= CAD-SACR
Backseat Detentions	68,377	42,982	25,395
Consent Searches	40,074	21,805	18,269
Reasonable Suspicion	7,507	26,132	-18,625

Backseat Detentions

According to Sheriff's Department policy, deputies should only detain civilians in the backseat of patrol vehicles (backseat detention) when the deputies believe the person detained may pose a threat or is an escape risk.³² The CAD system logged a total of 68,377 backseat detentions. The SACR system reflected only 42,982 backseat detentions – which is **37.1% fewer** backseat detentions than logged into the CAD system.

Consent Searches

"Consent searches" are searches where a deputy requests permission and receives authorization from a person stopped to search her/his person or property. Consent searches are the most common type of warrantless searches conducted by deputies. The Sheriff's Department policy on consent searches dictates these searches must be reasonable and the deputies must be able to articulate a valid reason for the stop and the search.³³ The CAD system logged a total of 40,074 consent searches. The SACR system only reflected 21,805 consent searches – which is **45.5% fewer** consent searches than logged into the CAD system.³⁴

Reasonable Suspicion Stops

A reasonable suspicion stop refers to a stop made by deputies where they suspect the person stopped has been engaging in or is about to engage in criminal activity. Sheriff's Department policy dictates reasonable suspicion stops should not be based on race, color, ethnicity, national origin, gender, gender identity, disability, or sexual orientation.³⁵

³² See Manual of Policy and Procedures 5-09/520.10 "Backseat Detentions."

³³ See Manual of Policy and Procedures 5-09/520.05 "Stops, Seizures and Searches."

³⁴ This review only examines consent searches of persons and not property such as vehicle, buildings, or other property.

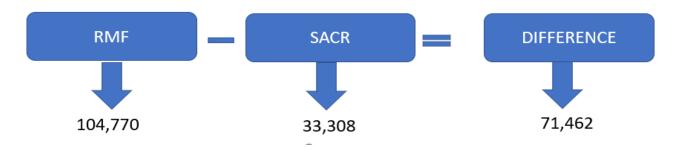
³⁵ See Manual of Policy and Procedures 5-09/520.05 "Stops, Seizures and Searches."

During the time-period under review, deputies logged more stops into the SACR system than into the CAD system. Reasonable suspicion stops logged into the CAD system totaled 7,507 compared to 26,132 in the SACR System – **248%** more reasonable suspicion stops logged in the SACR system than in the CAD system.

This level of variance is significant because both the CAD and SACR systems require reasonable suspicion stops be entered and the definition of a reasonable suspicion stop is the same for both systems.³⁶ As such, the total number of reasonable suspicion stops should generally be the same in both systems.

RISK MANAGEMENT FORUM DATA COMPARED TO SACR DATA: THE SACR SYSTEM UNDERREPORTED ARRESTS BY 71,462

The Risk Management Forum is an internal risk management process where Sheriff Department executives and command staff from certain divisions meet twice a year to review incident statistics, including calls for service, observations, uses of force, arrests, and other statistics. The Office of Inspector General reviewed Risk Management Forum statistics and found that Risk Management Forum statistics reflected 71,462 more arrests than are logged in the SACR system³⁷ as calculated in the following graphic:



In other words, it appears that the **SACR system underreported arrests by a minimum of 71,462**.³⁸ Moreover, Risk Management Forum totals do not reflect all

³⁶ The CAD system requires a "Reasonable Suspicion" stop be entered into the CAD system and requires deputies to identify the "reason for contact" in the "Probable Cause Stop." See the Sheriff's Department's *Statistical Code Guide/Radio Code Book* (SH-R-316). The SACR system has a similar requirement. In the SACR system, deputies must complete the "Reason for Stop" field, which states the reason why the deputy conducted the stop according to the Sheriff's Department's *Automated Contact Reporting System User Guide For Deputy*.

³⁷ The Office of Inspector General staff obtained SACR system arrests totals from extracting all instances in the SACR data that were labeled as arrests containing a "TRUE" in the "arrest with a warrant" or "arrest without a warrant" columns and those containing "TRUE" in both columns of the dataset.

³⁸ The Sheriff's Department provided CAD system data reflected 39,874 arrests. From this total, Office of Inspector General staff subtracted the 33,308 arrests which were logged into the SACR system, leaving a difference of 6,566

arrests made by all Sheriff's Department units. Risk Management Forum arrest totals come from all patrol Divisions, the "Special Operations Division," "Court Services Division" and the "Countywide Services Division." Arrests made by other "miscellaneous units" of the Sheriff's Department are not reflected in these totals because they are not required to present statistics to the Risk Management Forum.

For 2018 and 2019, these miscellaneous units of the Sheriff's Department reported an average of 3,222 arrests per year.⁴⁰ If this average arrest total were added to the Risk Management Forum totals stated above, the total number of arrests underreported in the SACR system would increase to approximately **74,684 arrests**.

ADDITIONAL ISSUES AFFECTING SACR ACCURACY

In addition to the underreporting of stops and arrests in the SACR system, there are other data points not analyzed in this report that could significantly increase the number of underreported civilian contacts in the SACR system. The following are examples of some additional data points that may exhibit significant variance between the CAD system and SACR systems:

Additional Statistical Codes Which Require a SACR Entry

For this review, the Sheriff's Department only provided CAD system information for observation stops which were cleared using statistical codes 840, 841 and 842.⁴¹ These three codes are used by deputies in the CAD system to denote a traffic, pedestrian, and/or bicycle stop respectively. However, Sheriff's Department policy requires incidents involving several additional clearance codes be entered into the SACR

unaccounted for arrests. These 6,566 unaccounted for arrests may be included in the arrests that were underreported by 74,684 as cited above.

³⁹ Patrol stations include all 23 stations within the four divisions: South, North, Central and East. Special Operations Division include: Metrolink Bureau and Transit Services Bureau. Countywide Services Division include: Community Colleges, Community Partnerships, County Services, and Parks Bureaus.

⁴⁰ https://lasd.org/pdf/Transparency 2019 CAAS FINAL.pdf (Accessed December 29, 2021).

⁴¹ See Sheriff's Department Manual of Policy and Procedures 4-02/070.00 – "Statistical Codes." Statistical codes are used in each crime report's uniform report number (or URN). These statistical codes are published in Sheriff Department's Statistical Code Guide and Radio Code Book (SH-R-316). The Sheriff's Department's statistical coding system uses a three-digit number incorporated into its crime report numbers to classify the type of crime or incident that is being reported. The same three-digit statistical coding convention is used in the CAD system as "clearance codes." Once deputies finish a call, they input statistical codes to "clear" calls for service or observations by entering one or more of the codes into the CAD system. The choice of which code to use, is left to the deputies' discretion, but it should be the one which best describes the crime or incident which they responded to. The CAD system allows up to five statistical codes to be entered for each incident.

system. These additional clearance codes are outlined in <u>FOSS Newsletter 18-07-Sheriff's Automated Contact Reporting (SACR) System</u> which states:

"Certain call types should always be accompanied by a SACR. The following is not an all-encompassing list of statistical clearance codes which should (for the most part) always have a SACR attached:

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181-186, 188, 189, 191-199, 201-203, 221, 222, 231, 233, 234, 240-246, 252, 256, 280, 283, 285, 286, 290, 338, 395, 396, 397, 420, 422, 423, 431, 432, 436, 461, 463, 465, 601-609, 614-616, 716, 718, 720, 721, 723, 724-729, 840-843."
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These additional clearance codes correspond to various incidents which **require** an entry into SACR such as stops or arrests involving the following: narcotics, alcohol, loitering, gambling, drunk driving, vehicle and boating laws, warrants, receiving stolen property, certain misdemeanors, immigration laws, contacts with the mentally ill, reasonable cause arrests, transit infractions, detentions of suspicious persons, and citations.

The Office of Inspector General aggregated Risk Management Forum statistics and, in addition to the 5667 calls for service reported in CAD, identified 879,081⁴² calls for service and an additional 660,387⁴³ observations that were handled by the Sheriff's Department during the period of our analysis, but not reviewed by our staff. While not every unreviewed observation or call for service would have required a SACR system entry, the sheer volume of the approximately 1,529,813 unreviewed calls for service and observations logged into the CAD system warrant further audit and analysis to identify if there are additional incidents that utilized the above clearance codes but were not entered into the SACR system.

Tracking Multiple People Detained During the Same Incident

In the CAD system, a "TAG" number is a specific number assigned to a field incident (call for service or observation). However, the CAD system only allows deputies to enter information on two people per incident TAG. For example, if a vehicle has four occupants in which all occupants were either detained, searched or arrested, the CAD system would

⁴² According to Risk Management Forum statistics, there was a total of approximately 890,415 calls for service during the time-period of our review; however, the CAD system data the Sheriff's Department provided to the Office of Inspector General only reflected 5,667 calls for service, a difference of 879,081 unreviewed calls for

⁴³ According to Risk Management Forum statistics, there were a total of 941,732 deputy observations logged into the CAD system. The Sheriff's Department provided the Office of Inspector General CAD system data totaling only 281,345 observations, leaving a difference of 660,387 unreviewed observations.

only allow deputies to enter descriptions of two of the occupants. To accommodate for this limitation, the Sheriff's Department created CAD clearance code 843 (Code 843). Code 843 is used when logging information regarding an additional detained person(s) during a pedestrian, vehicle or bicycle stop.

As discussed above, the Office of Inspector General found the SACR system already underreported observation stops by 50,731 when compared to CAD system totals. The Sheriff's Department did not provide the Office of Inspector General with Code 843 data from the CAD system. A review of Code 843 stops from the CAD system would likely identify additional people stopped by Sheriff's Department deputies thus requiring additional SACR system entries. These additional Code 843 CAD entries would increase the observed underreporting of SACR system stop totals discussed above.

SHERIFF'S DEPARTMENTAL ACKNOWLEDGEMENT OF RIPA NON-COMPLIANCE

On December 4, 2020, the Office of Inspector General contacted the Sheriff's Department's Professional Standards Division with our preliminary findings of the discrepancies in stop entries between the CAD and SACR data systems. The Professional Standards Division acknowledged there were issues in the SACR system data. The Professional Standards Division also acknowledged the SACR system had not been audited to verify its accuracy in reporting. The Professional Standards Division representatives later stated they forwarded the Office of Inspector General's findings to executives within the Sheriff's Department, which included the Office of the Sheriff.

Shortly after this December 2020 meeting with the Office of Inspector General, the Sheriff's Department issued Field Operations Support Services Newsletter 21-03 "SACR MDC/CAD Clearance. 44" Per this newsletter, deputies were required to enter new CAD clearance codes based on the number of people contacted during the stop and denote how many people, if any, are subject to SACR reporting. 45 By using these new clearance codes to track the number of civilian contacts required to be reported under RIPA, the Sheriff's Department hopes to reconcile any differences between the CAD and SACR systems. The Sheriff's Department stated implementation of the new clearance codes would enable it to conduct audits on both the CAD and SACR systems.

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⁴⁴ Issued February 23, 2021

⁴⁵ These new clearance codes contain three numbers beginning with "94X;" the "X", changes based on the number of people contacted during the stop. For example, if four people were contacted, and if all four must be documented per RIPA as part of the stop, the deputies would clear the stop with the clearance code "944." While this may not be the optimal method to alert a supervisor when an individual deputy fails to enter data into both systems, this quick tally can help alert stations, bureaus, and/or units when they are failing to enter data into both systems as required by Sheriff's Department policy.

Approximately a year later on December 6, 2021, Office of Inspector General staff again contacted the Sheriff's Department Professional Standards Division and presented additional findings, mainly pertaining to the Risk Management Forum data, and presented persisting concerns regarding the continuing inaccuracies in the SACR data. The Sheriff's Department representatives again acknowledged that it was not in full compliance with RIPA requirements. Moreover, the Sheriff's Department plan to implement additional clearance codes in Field Operations Support Services Newsletter 21-03 was not implemented because the CAD system was unable to handle an expansion of that nature. The Office of Inspector General could not verify the CAD system's inability to accommodate the implementation of additional clearance codes. The Sheriff's Department stressed that any solution to the issues outlined in this report would require substantial funding to update and/or replace the CAD system.

As of December 2021, the Professional Standards Division acknowledged the Sheriff's Department is unable to do a meaningful audit of the SACR system. This is especially concerning since the Sheriff's Department reported to the RIPA Board that it had audited and analyzed stop data.⁴⁶ The Sheriff's Department told the RIPA Board:

"The LASD regularly audits stops and back seat detentions within the Antelope Valley stations' response area. The entire contact is analyzed along with how the call was cleared...The LASD internal audits for all stations within the Department are posted for the public on-line and shared with the Office of Inspector General for Los Angeles County and the Civilian Oversight Commission for Los Angeles County." (Emphasis added).

This appears to contradict the statements of Sheriff's Department representatives to the Office of Inspector General in December 2021. The Sheriff's Department told Office of Inspector General staff that it was unable to conduct a meaningful audit because of the limitations of the CAD system described above. Based on the discrepancies seen and described at length in this report, coupled with the statements made by Sheriff's Department representatives to the Office of Inspector General, it is unclear how the Sheriff's Department was able to conduct "internal audit for all stations within the

⁴⁶ Racial and Identity Profiling Board, "2021 Annual Report," California Attorney General's Office, https://oag.ca.gov/sites/all/files/agweb/pdfs/ripa/ripa-board-report-2021.pdf at pages 79 and 82.

⁴⁷ *Ibid,* at p. 82, "[w]hile LA County Sheriff reported that it has the ability to analyze data collected on detentions and community contacts, and has conducted those audits in the past, it does not have a policy directing regular audits on the data."

Department" as it stated to the RIPA Board. 48 Also, the Office of Inspector General has not been given access to Sheriff's Department reports of any such audits of the SACR system.

Following our meeting of December 6, 2021, the Sheriff's Department revised its Field Operations Support Services Newsletter 21-03 on December 29, 2021 to include procedures that enable corrections, within 24 hours, to any cleared calls for service where a 94X Stat code was not used or improperly used. Additionally, it added four reports to monitor compliance and to notify executives of deputies' non-compliance. The Sheriff's Department provided samples of these reports. The Office of Inspector General is unaware of the methodology or system used to compile or generate these reports and therefore cannot opine on the accuracy of these reports.

Although the updated procedures in Field Operations Support Services Newsletter 21-03 are a step towards reconciling the CAD system data with SACR system data, the procedures do not provide sufficient assurance that all CAD system entries requiring SACR system entries are being made for the following reasons:

- Although Field Operations Support Services Newsletter 21-03 requires that a 94X stat code be entered to clear all observations and calls for service, the new procedures and reports measure compliance only for calls for service which make up a small percentage of all reported civilian contacts⁴⁹and do not measure any compliance for observationbased stops.
- 2. Exception reports mentioned in the revised Newsletter **only target calls for service that were cleared with stat codes 840, 841, 842 and any call for service involving arrests**. They exclude stat code 843⁵⁰ and all other codes that require an automatic SACR entry per Field Operations Support Services Newsletter 18-07 (see above).
- 3. These procedures do not reconcile the 94X stat code entered in the CAD system with the number of people entered in the SACR system. For example, if stat code 944 was entered into the CAD system, the

⁴⁸ *Ibid.* at pp. 82-83, "Six agencies (Bakersfield PD, Fresno PD, Long Beach PD, Los Angeles County SD, Riverside County SD, San Francisco PD) indicated that there were some barriers to analyzing the data or exporting it to analyze it, including difficulty in creating reports, auditing the data, or integrating the data collection systems with other departments systems."

⁴⁹ Civilian contacts resulting from a call service reported by the SACR system during July 1, 2018 through June 30, 2019 totaled 20,989 or 8.3% of all civilian contacts reported.

⁵⁰ Stat code 843 is used when logging information regarding an additional detained person(s) during a pedestrian, vehicle or bicycle stop.

- procedures in the updated newsletter do not verify that four civilian contacts were entered into the SACR system. Effectively, leaving the systems unreconciled.
- 4. Although Field Operations Support Services Newsletter 21-03 provides that an executive notification be made if the newly established procedures are not complied with, it does not outline potential discipline for those deputies who repeatedly are found in non-compliance with the newsletter giving deputies the impression that there will be no consequence. Furthermore, the fact that these new procedures were released in a "newsletter" rather than in an update the Manual of Policy and Procedures adds to an impression that compliance is not of the utmost importance to the Sheriff's.

CONCLUSION

The Office of Inspector General's review found significant underreporting of civilian stops and arrests in the SACR system. In comparison to the CAD system data, we found the SACR system underreported observation-based stops by at least 50,731. We also found indications that the underreporting of stops is widespread throughout the Sheriff's Department's patrol divisions. In comparison to Risk Management Forum statistics, the Office of Inspector General found the SACR system underreported arrests by at least 71,462. In addition, the Office of Inspector General also found significant differences between CAD system and SACR system totals relating to backseat detentions, consent searches, and reasonable suspicion stops. Moreover, the Office of Inspector General identified issues regarding CAD system clearance codes and the CAD system's inability to record stops involving multiple detainees that might result in additional underreporting of RIPA data.

The logical conclusion is that the primary causes of the observed discrepancies between the CAD and SACR systems are that deputies are failing to enter civilian stop data into the SACR system after entering it into the CAD system and supervisors are not identifying and remedying the discrepancies when they occur. The failure to enter stop information into the SACR system violates state-law RIPA mandates as well that the Sheriff's Department's own Field Operations Directive 18-004, which specifically states deputies shall make a "stop data" entry into the SACR application after conducting a civilian contact. While the exact extent of underreporting is difficult to estimate with precision, the problem of underreported RIPA data is undeniable.

The effects of underreporting SACR system data extend further than Los Angeles County. RIPA was enacted to ensure that the public, law makers, and law enforcement

officials are aware of the racial inequities in civilian stops. As one of the largest law enforcement agencies in the state, the Los Angeles Sheriff's Department conducts a large percentage of state-wide civilian stops. The RIPA Board analyzes the Sheriff's Department's stop data to help identify issues of racial profiling and promulgate recommendations to remedy these issues. The submission of inaccurate data to the Attorney General's Office undermines the purpose of RIPA because inaccurate data may compromise the effectiveness of the research and analysis efforts by the RIPA Board.

Although the Sheriff's Department has acknowledged the accuracy issues in the SACR system, it has been unable to implement a plan to audit and reconcile CAD and SACR system totals to ensure the accuracy of its published RIPA data. As a result, it appears that the Sheriff's Department has been significantly underreporting state-law required RIPA data to the California Attorney General. The Office of Inspector General urges the Sheriff's Department to adopt the following recommendations to improve the accuracy and oversight of its RIPA data.

RECOMMENDATIONS

- A comprehensive audit of the CAD and the SACR systems from July 2018 to the
 present identifying all errors within the prior reports should be conducted by a
 qualified third-party entity. That entity should prepare a report to be submitted to
 the California Department of Justice noting the errors and documenting the
 accurate data.
- 2. To promote transparency and oversight, the Sheriff's Department should make **ALL** CAD system data available upon request to the Office of Inspector General.
- The Sheriff's Department should develop internal controls that ensure deputies are entering appropriate stop data in both the CAD and SACR systems, including but not limited to:
 - a. Revising Field Operations Support Services Newsletter 21-03 "SACR MDC/CAD Clearance" so the procedures and exception reports outlined in this Newsletter apply to <u>all calls for service</u> and <u>all observations</u> entered in the CAD system. These revisions should also include exception reports that identify missing CAD entries which contain all the stat codes as listed in Field Operations Support Services Newsletter 18-07. These procedures should continue to be conducted on a daily basis by a Sheriff's

- Department supervisor or her/his designee and any discrepancies corrected within 24 hours.
- b. Sheriff's Department should implement unit-level real-time audit procedures that reconcile the number of people entered into the SACR system with the number of people identified in the CAD system based on the "94x" clearance codes and any discrepancies corrected within 24 hours.
 - i. The Sheriff's Department asserted that the implementation of additional clearance codes pursuant to Field Operations Support Services Newsletter 21-03 failed because the CAD system was unable to handle an expansion of that nature.
 - ii. Therefore, the Sheriff's Department should conduct in conjunction with other County partners a comprehensive assessment of CAD system capabilities and determine whether there is a feasible way forward to implement Field Operations Support Services Newsletter 21-03.
- c. Develop a SACR system report listing the number of people stopped per CAD TAG number⁵¹ and reconcile this report to the number of people listed in each deputy's daily work sheet. This reconciliation should be conducted on a daily basis by a unit supervisor or his/her designee and any discrepancies corrected within 24 hours.
- d. Results of unit level audits on SACR and CAD systems should be included in the Risk Management Forums for presentation and discussion by Sheriff Department executives and unit commanders.
- e. Results of unit level audits of SACR and CAD systems should be published on the Sheriff's Department website on a monthly basis.
- 4. For future reports, the Sheriff's Department Audits and Accountability Bureau should conduct regular audits to reconcile any data discrepancies between the

that can be used to cross reference incidents logged into both systems.

⁵¹ A "TAG" number is a specific number assigned to each field incident (call for service or observation) within the CAD system for a specific day and specific unit/station and recorded in each Deputy's Daily Work Sheet (DDWS) per Field Operations Directive 00-004 Deputy's Daily Work Sheet and Logging Public Contacts. See, Sheriff's Automated Contact Reporting (SACR) System User Guide for Deputy version 1.5, page 5. The Sheriff's Department uses this unique TAG number in both the CAD system and the SACR system to create a common identifier in both databases

CAD system and the SACR system and take immediate action to correct any observed discrepancies **BEFORE** submitting the information to the State of California.

- 5. The Sheriff's Department should conduct annual trainings at each station on the requirements of RIPA.
 - a. Training curriculum should include training on the requirements of Field Operations Directive 18-004 and Manual of Policy and Procedures 5-09/520.25, which set forth guidance on what data to enter into SACR system.
 - b. Trainings should stress the importance of entering the required stop data entries in both the CAD and SACR systems and potential disciplinary ramifications for not entering proper data in either system.
- 6. The Sheriff's Department should establish a RIPA Compliance Help Desk where deputies in the field can call in to ask questions on what to enter into the databases. Similar help desks are already in place supporting other computer programs within the Sheriff's Department.
- 7. The Sheriff's Department should develop a concrete fiscal plan to replace the CAD system with a single system for logging civilian contacts to avoid redundant data entry and underreporting of data.

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COUNTY OF LOS ANGELES HATELOF JUSTICE



ALEX VILLANUEVA, SHERIFF

June 2, 2022

Dara Williams Chief Deputy Los Angeles County Office of Inspector General 312 South Hill Street, Third Floor Los Angeles, California 90013

Dear Chief Deputy Williams:

RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF INSPECTOR GENERAL REPORT REGARDING "THE SHERIFF'S DEPARTMENT'S UNDERREPORTING OF CIVILAN STOP DATA TO THE CALIFORNIA ATTORNEY GENERAL"

The Department has reviewed your report, recommendations, and the requested response regarding "The Sheriff's Department's Underreporting of Civilian Stop Data to the California Attorney General." The Department has already implemented many of the recommendations; the Audit and Accountability Bureau (AAB) will draft a follow-up report highlighting these implementations and, upon completion, will forward it to the State of California Department of Justice - Office of the Attorney General, and a copy to the Los Angeles County Office of Inspector General.

Sincerely,

ALEX VILLANUEVA, SHERIFF

TIMOTHY K. MURAKAMI

UNDERSHERIFF

211 West Temple Street, Los Angeles, California 90012

A Tradition of Service